

C6 GOA CV Chinook PSC Limit Adjustments Public Comment – APRIL 2018

Clay Bezenek

Commercial salmon fisherman/ Southeast drift
3/12/2018 1:29:43 PM

NPFMC board, Please LOWER the allowable bi-catch for chinook salmon at the soonest available opportunity!!! The truth is, one mans bi-catch is another mans target species. The big boats who are "incidentally" taking these fish have an obligation to the other consumptive harvest groups to fish clean, and it's your job to oversee this. I'm hoping you will more closely manage all of the vessels, from less than 60' up, to blanket the observer coverage so we can all more greatly benefit from the safe return of the migratory species. As a active fisherman myself, I don't want these bigger boat guys Get shut down. I want them to be responsible for each and every take that their nets come across. I don't catch any pollock or perch while I drift here in Ketchikan, and I likewise expect similar courtesy. Thanks, Clay Bezenek F/V Salty

Casey Mapesy

Commercial Fisherman
3/12/2018 9:22:45 PM

I wish to speak out against any increases to GOA bi-catches of any species in the trawl fishery, particularly chinook. I was at the BOF meeting in Sitka, and I saw the devastation on the faces of people from communities that lost nearly everything. 5 rivers were put on the stock of concern list, while still others were deeply considered for it. Though I don't live in one of the communities most affected, trolling which I am heavily dependent upon for a large portion of my income, took heavy cuts. 6 weeks lost from the winter fishery, spring curtailed severely in many areas. This equates to millions lost to the troll fleet I am a part of. In my community of Yakutat, we have stared down the barrel of the stock of concern for years now. Our Chinook runs have been Barely making it. Two years ago, we had 170 returning adult chinook to the Situk River, total. I understand the perspective that they only claim that 15% of their bi-catch is Alaska fish, but that still is 1000's of fish. At a time this critical, everyone should be pain sharing. We are in a desperate fight for the very survival of our communities, and the prolonged existence of our chinook runs in our rivers. In addition to this, I firmly believe you should be considering other species that are in deep trouble they also affect. 80% of the GOA Pacific cod population is gone, other communities are suffering greatly from this, we just don't need any more bi-catch/waste of anything. Thank you for considering my concerns on this matter.

Dan smith

Commercial salmon fisherman
3/13/2018 9:14:50 PM

There is no way that the trawl bycatch of king salmon should not be adjusted to levels that show some at least some responsibility as a harvester. It is disgraceful that our fisheries management is so intertwined with big money that the trawlers have been allowed to do what they do. I absolutely oppose any law that allows the drafters to take anymore of our king salmon. Dan Smith

Colleen Helligso

F/V Pacific Star
3/30/2018 9:38:59 AM

Attaching file.

Attachments: [3.29.18 CHelligso Chinook Comment Letter .docx](#)

Linda Behnken

Alaska Longline Fishermen's Association
3/30/2018 10:10:28 AM

Attachments: [ALFA comment Agenda Item C-6 Chinook PSC 3.30.18.pdf](#)

Mayor Daniel A Rohrer

Kodiak Island Borough Assembly and City of Kodiak Clty Council
3/30/2018 10:21:09 AM

Please review the attached joint letter from the City of Kodiak City Council and the Kodiak Island Borough Assembly.

Attachments: [2018-03-29 NPFMC Chinook Letter Signed Letter.pdf](#)

Bert Ashley

F/V Gold Rush
3/30/2018 11:54:35 AM

Attachments: [Gold Rush C6 letter.pdf](#)

Dupacificbgan Daniels I am very

Se alaska salmon troller
3/27/2018 8:34:19 PM

I am very against any increase in trawl king salmon bycatch in the trawl fishery. I am a salmon troller in Se alaska who has been completely shut down because of stocks of concern which for me is unfortunate but acceptable on the grounds of conservation. To allow an increase in bycatch on king salmon is what I consider stupid when most our Se alaska kings go west to grow up before coming back to spawn. I am also against any kind of Qouta roll over from year to year. Some years there is a high abundance of kings some years there is not and to roll Qouta over to a year of low abundance could have the outcome of extinction for some watersheds. Please vote no on this idea. As responsible stewards of the ocean and our younger generations you have the obligation to protect these fish and not destroy one fishery to help another one which is made of corporate owned factory boats.

Tom Evich

FV Karen Evich
3/30/2018 10:50:28 AM

Attachments: [letter to council April 2018 - Evich.docx](#)

Heather Mann

Midwater Trawlers Cooperative
3/30/2018 10:53:55 AM

Attachments: [MTC C6 Public Comment April 2018.pdf](#)

Bert Ashely

F/V Gold Rush
3/30/2018 11:16:46 AM

Attachments: [Gold Rush C6 letter.pdf](#)

Kent Helligso

F/V Laura and F/V Pacific Star
3/30/2018 12:40:06 PM

My name is Kent Helligso. I have lived and fished out of Kodiak for 44 years. I am involved with two family owned trawl vessels which deliver to Kodiak exclusively, providing jobs for hundreds of shore-based cannery workers. 95% of my crew are local folks, homeowners, some with children attending Kodiak schools as well as contributing to our local economy in many other ways. My grandchildren are also interested in fishing and have first-hand experience by accompanying their parents on the boats when not attending school. The future of our grandchildren and the Kodiak community are in your hands. The decisions you make regarding the GOA Non-Pollock Trawl Chinook PSC Limits impact our island community more than any other port in Alaska. Please consider the scientific facts as well as taking into account the amount the trawl sector has contributed, as well as sacrificed to make this a viable and renewable fishery. Thank you.

Jody R Cook

FV Cape Reliant , self
3/30/2018 12:47:45 PM

Attachments: [2018 letter to council.pdf](#)

Lance Preston

F/V Seaboy, F/V Duna
3/30/2018 12:49:34 PM

As a SE Alaska salmon troller facing unprecedented chinook fishing restrictions, while several SE stocks have been listed as Stocks of Concern, I think it's horrific that an increase in Chinook bycatch in the trawl fisheries is even being considered. I urge the Council to vote "no action".

Matt Lawrie

3/30/2018 12:57:31 PM

I am a second generation Southeast Alaska salmon fisherman who has relied on chinook for a portion of my livelihood my entire life. I do not support the Council's continued consideration of raising the chinook PSC in the GOA non-pollock non-rockfish fishery. As many previous comments have noted, and as I am sure the council is aware, our local Southeast chinook runs are experiencing the worst down cycle in at least the last 40 years, and as a consequence, our fisheries have been severely curtailed. I would like to add my voice to those who are experiencing this drastic reduction in fishing opportunity and who are at turns mystified and furious that the Council could be seriously considering raising the PSC limits at this time. Commercial, sport and subsistence fisherman from the Copper River to Northern British Columbia are tightening their belts in an effort to maximize escapement, giving up what to us is a highly sought after, valuable resource. The idea that we are making these sacrifices while The council considers raising the Prohibited Species Catch cap undermines the ethos of a shared conservation burden that is such an important part of our states' fishing heritage. Thank you for your service and for your consideration on his item.

Julie Bonney

Alaska Groundfish Data Bank
3/30/2018 12:59:38 PM

Attachments: [C6 AGDB Comment Letter Final.pdf](#)

Jeff Farvour

3/30/2018 3:14:02 PM

Dear Chairman Hull and Council members, My livelihood is heavily dependent on trolling for salmon in SE Alaska of which trolling for chinook makes up a bulk of that year around income. Unfortunately, 2017 was the worst escapement of SE chinook on record and 2018 is projected to be even worse which has caused severe and unprecedented chinook closures to conserve and rebuild chinook stocks. This is resulting in devastating financial implications for chinook fisherman, processors and communities. To begin to understand how widespread these impacts reverberate you should understand several things including: troll permits are owned and fished by residents of nearly every single community in SE, trolling has about a 89% residency rate and trolling is SE's only year around fishing economy. From that alone it should be clear that the effects of these conservation measures are wide spread and ripple through every single community and businesses in SE. Because of this I am requesting that the Council not take any action that would increase chinook bycatch and in fact, in light of current SE (and BC & West Coast) chinook stocks status, I believe the Council should be reducing chinook bycatch. If any future analysis is to move forward then I ask that the impacts to SE chinook fisherman to be fully captured and quantified. Two easy examples include : " the unexpected and unprecedented loss of 31,000 chinook troll allocation in August of 2017 at a cost of \$2.8 M in ex vessel alone " the early closure of the 2018 winter troll fishery (which has a nearly 100% residency rate) which will cost the troll fishery another \$2.3M- \$4.2M in ex vessel depending on what ADFG decides in forgoing further troll allocations Sincerely, Jeff Farvour Sitka F/V Apollo

Joe Daniels

Commercail Fisherman
3/26/2018 7:01:21 PM

I am a second generation salmon troller from SE AK and have fished commercially for over 30 years. My livelihood and way of life is dependent greatly on having and maintaining a healthy and sustainable abundance of Chinook salmon in Alaska. I own one of the 1000 some odd boats tied to the dock right now in SE AK unable to access our fish and will remain completely shut down for months. This is a severe closure and represents drastic measures to rebuild our Chinook runs. Allowing increased waste of Chinook anywhere in Alaska at this time must be considered negligent, irresponsible and perhaps in utter disregard for the spirit of our great state of Alaska, where we have always taken pride in recognizing the importance of sustaining and maintaining our fisheries first and foremost. I urge the deciding members to carefully examine the facts and data and make the just decision for all stakeholders. Joe Daniels - FV Amnicon - Sitka, AK

Ryan Kelly

Commercial Fisherman
3/28/2018 8:20:46 AM

The idea that a increase in King Salmon bycatch limits could be contemplated at this time is beyond rational thinking. With all other user groups being reduced so drastically, I can't imagine how the trawl fleet wouldn't be sharing these same Chinook reductions, instead of a possible increase! I completely oppose this action.

Bill Connor

ASWS

3/28/2018 4:56:41 PM

I am Bill Connor partner in the 58 foot F/V Cape Reliant. I have been fishing since 1975 and trawling since 1992 on my own vessels. We are from Petersburg Alaska. We fish year round and have 8 families that are employed throughout the year and depend on us for there income and livlihood. We trawl Western gulf and Central Gulf for P-cod and Pollack. With the huge cut in p-cod we are struggling to stay viable, we depend on these fisheries. This fishery provides 45% of our incomes and with any down turn in pollack we will need to target other flatfish to stay in buisness. The Chinook cap needs to be increased. Hatcheries are producing Chinook that are not of wild origin and increased production increases our catch which then count against our trawl fishery. I believe we need to look at the killer whale population explosion as a more direct impact to Chinook than trawl fishing. It is know scientifically that killer whales target Chinook as a favorite fish. Who is limiting there take? Reducing our take of Chinook will severely impact several families and individuals in Petersburg. We actually need to increase our PSC for non-pollock non-rockfish fisheries,by 2,000 to 3,000 fish to be more intact with past levels. This will allow us to develop more flat fish fisheries in western gulf. Thank you Bill Connor

Samantha Weinstein

Southeast Alaska Guides Organization

3/29/2018 7:44:33 PM

Attachments: [C6 GOA Chinook CV PSC Opposition.docx](#)

Claude young

Haida Nation

3/14/2018 9:46:46 AM

It is of great concern the declined in numbers of returned Chinook salmon in the waterways of Southeast Alaska. As people of the sea, who have inhabited the Southeast area for hundreds of years, we can see a powerful blow to our lifestyle and way of surviving. In this comment box, I speak for all of Southeast Tribes as well as our cousins south of the boarder. For many generations before me, we have thrived as coastal people, in trade, culture, in he way we lived our lives in harmonious balance with nature. It's very disheartening to see a man made machine come into our waters and strip our resources to almost extinct type of numbers. Our fishing industry has seen a collapse following a trend of industries that were suppose to protect us and benefit us in the past. In no way am I imposing that this is in anyway indeed your organizations fault, but as the last thread of our livelihood as indigenous people, we do not survive if our salmon don't survive. And as your organization seems to have to power to impose or hold impact of the amount and type of fishing in our waterways, I hope you look at the bigger picture and not just short term benefits. Commercial trawling has no place in Southeast waterways, it is a unhealthy and insufficient type of fishing that reeks havoc on every species it comes into contact with. As human beings, we have a duty to protect our oceans and our ancestral grounds from such devastating destruction. As the world pushes for more options of cleaner, safer alternatives in seafood consumption, I hope your organization will take a stand and seriously review what is at sake, not just for the indigenous community but for all communities in Southeast Alaska that are directly impacted by the decline in chinook in their area. I appreciate you letting me have the chance to make a public comment on he matter, and I hope the right decisions are made on the subject. Claude Young (907)-617-6306

Joel Kawahara

3/29/2018 10:10:00 PM

Dear members of the North Pacific Fisheries Management Council, I oppose increasing chinook PSC caps in the Gulf of Alaska for trawl fisheries. I support no action on agenda item C6. I am a salmon troller based in Washington state. I have troll permits in Alaska, Washington, and Oregon. I've been a board member of the Alaska Trollers Association from 1994 to present. I am involved in lower 48 fish policy via the Pacific Fisheries Management Council (PFMC) as a member of their Habitat Committee reviewing Essential Fish Habitat issues for Council managed species. I am writing on my own behalf. I have attended recent PFMC briefings on the Biological Opinion re-consultation for salmon bycatch in the groundfish fisheries of the Pacific coast. I'm certain you are aware of this document, but just in case you want to it, it is available at: https://www.pcouncil.org/wp-content/uploads/2018/02/H5_Att1_FullVersionElectricOnly_S7-Groundfish_biop_121117_MAR2018BB.pdf The connection to the North Pacific Management Council document "Chinook Salmon Prohibited Species Catch in the Gulf of Alaska Non-Pollock Trawl Fisheries, Initial Review Draft Environmental Assessment, January 2018" is this documents assumes increasing PSC caps for chinook and not having to re-consult on listed chinook from Washington State. I believe this is unrealistic for two reasons. First, Washington State chinook stocks are in a lot worse shape than they were when the initial ESA consultation occurred. It simply makes sense for NOAA to check their assumptions on jeopardy, as they just did for the Pacific coast groundfish fishery. Secondly, the draft

Environmental Assessment discusses using Adult Equivalent Mortality discounts as an adjustment to the PSC cap (page 66). I specifically asked the NOAA biologist who briefed the Pacific Fisheries Management Council on why they did not have an Adult Equivalent Mortality calculation in the Biological Opinion for the Pacific coast groundfish fishery. The answer is simply that the Biological Opinion is conducted on chinook mortalities regardless of their age. It is my belief that the draft Environmental Assessment conclusion that no re-consultation will be necessary is incorrect if the draft Environmental Assessment uses an Adult Equivalent Mortality calculation for chinook salmon. I conclude the North Pacific Fisheries Management Council should take no action on this agenda item until this assumption is thoroughly assessed. I am also extremely worried about the impact of existing salmon bycatch on chinook originating from Alaskan rivers. In particular Southeast Alaska chinook stocks are at critically low levels. Additional reductions in the numbers of spawners will make recovering these runs all the more difficult. The GOA salmon bycatch is likely not evenly distributed across all Southeast Alaska chinook runs. Southeast Chinook have two distinct marine life histories - near coastal and far migrating. The far migrating stocks include the Situk, Alek, Taku and Stikine rivers. The draft Environmental Assessment simply states that they do not have the data in the form of Coded Wire Tag recoveries or Genetic Stock Identification to estimate the impact on any particular run of chinook (page 67). I recommend the draft Environmental Assessment be revised with an estimation of the impact of bycatch on the Situk, Alek, Taku and Stikine as the most likely stocks in the bycatch. I support no action until this analysis is conducted. Thank you for considering my comments. Joel Kawahara 3652 Lindsay Hill Road Quilcene, WA 98376

James Fischer

F/V Pala II
3/29/2018 10:36:17 PM

Dear North Pacific Fisheries Management Council Members, My name is James Fischer, a Sitka based fisherman, and I'm writing to request that the NPFMC not increase the Prohibited Species catch levels of Chinook salmon in the Gulf of Alaska. I strongly request that no action be taken on agenda item C 6. As a Southeast Alaskan commercial fisherman, my family depends heavily on Chinook salmon. As you well know, these salmon stocks are at risk, and our fleet has been facing debilitating restrictions to conserve Chinook salmon. Increasing allowable catch levels in trawl fisheries would not just hurt us, it would be an affront to the Alaska Department of Fish and Game, which is taking extreme measures to protect small numbers of these fish. I have also worked in the trawl fishery, and I know first hand that much has been done, and much money spent, by responsible trawlers to reduce their catch of non target species. Why take steps backwards, especially when our Chinook stocks are so vulnerable? Please do not move to increase allowable catch of Chinook salmon. Rather, I would urge proactive efforts to further limit trawl catch of Chinook in the Gulf of Alaska. Respectfully, James Fischer

Jared Gross

Se drift gillnet fisherman
3/14/2018 2:02:22 PM

Hi my name is Jared Gross, I live in Wrangell Alaska and have been fishing king salmon my entire life. I currently operate a drift gillnet fishing operation in southeast. I think increasing the chinook bycatch in the GOA is absolutely ludicrous. Southeast is experiencing the lowest king salmon returns ever, fishing districts are being closed to the retention of king salmon throughout all of southeast, there is no sport king salmon derbies happening, commercial fishing for kings is not being allowed so how does it make sense to increase the bycatch of chinook in the GOA. The only action we should be taking is reducing the limit of chinook bycatch. The fish and game is taking action in southeast to protect what few fish might be returning to these king salmon streams. It is hurting a lot of fisherman's pocketbooks but we are dealing with it. I disagree with this increase in chinook bycatch in the GOA and hope this doesn't happen. Thanks

Eric Jordan

I Gotta Seafoods
3/28/2018 1:42:09 PM

Dear Council members, I am writing in regards to C6 GOA CV Chinook By-catch. I understand the Council is considering raising the chinook caps in the Gulf of Alaska Trawl Fisheries. I am adamantly opposed to this action and believe as Paul Olson has stated that you are way out of line here if not behaving illegally. I grew up trolling, am still trolling 68 years later, and my sons troll. I served 8 years on the AP from 78-86 back when the Council actively managed salmon. I can not believe it has come to the point where you are seriously considering raising chinook by-catch caps at a time when chinook populations in many streams in Alaska are reduced, in particular in SE Alaska where we have 3 stocks of concern and other stocks where we are looking at returns below minimum escapement. Trollers have or will have foregone about 65,000 chinook harvest between August 2017 and May 1 2018 to save a few hundred of these extremely valuable, in many ways, salmon. I believe, as Paul Olson has stated in his February comments, that you should be looking at alternatives to reduce the chinook by-catch in Gulf of Alaska Trawl fisheries, not increase it. WTF are you thinking? I worked for 6 years in the winter months for the Alaska Marine Conservation

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Council about 20 years ago. Part of my job was campaigns to reduce trawling in state and federal waters. I viewed hours and hours of videos showing the effects of trawling on benthic habitat. I also carefully studied by-catch reports and talked to fishermen about the accuracy of these reports. It is my opinion that until you have full observer or video coverage of every trawl every day you have little idea of the total by-catch of Chinook or other species. Finally, do not raise the Chinook by-catch Caps in the Gulf Trawl fishery. Immediately prepare an alternative that reduces Chinook by-catch caps. Implement immediately full observer and or verifiable video coverage of every trawl tow in the Gulf of Alaska. Thank you, Eric Jordan 103 Gibson Place, Sitka AK 99835

Tad Fujioka

FV Merlin

3/29/2018 9:46:31 PM

Dear Chairman Hull, I understand the Council is considering allowing increased levels of Chinook bycatch in GOA fisheries. This timing and optics of even contemplating this are terrible. The Southeast Alaska Chinook troll fishery was shutdown in August 2017, forcing the fleet to forgo 31,000 Chinook that had been allocated to us in order to increase the spawning escapement in local systems by a few hundred fish. This premature curtailment of the 2017 troll Chinook fishery meant that the harvest was close to the lowest it has been in around 100 years! The 2018 quota for the troll fishery has just come out and it is substantially lower yet. Don't increase bycatch at a time when stocks are so weak that directed harvest is at a once-a-century low point. Tad Fujioka F/V Merlin

Kent Leslie

FV Excalibur II

3/29/2018 3:14:15 PM

Attachments: [NPFMC 2018 Letter .docx](#)

Bob Krueger

F/V Mar Del Norte

3/29/2018 4:03:13 PM

Attachments: [C6 GOA Non-Pollock Trawl Chinook PSC Limits - Mar Del Norte.docx](#)

Kathy Hansen

Southeast Alaska Fishermen's Alliance

3/30/2018 8:49:40 AM

Attachments: [GOA Chinook PSC Limit Adjustments 3.28.18.pdf](#)

Stoian Iankov

3/30/2018 8:59:05 AM

Attachments: [Iankov Chinook letter \(1\).docx](#)

Molly Zaleski

Oceana

3/30/2018 12:00:32 PM

Oceana's comment letter attached. Thank you

Attachments: [NPFMC GOA Chinook PSC Limit Oceana April 2018.docx](#)

Jason Chandler

3/30/2018 12:12:54 PM

Attachments: [C-6.docx](#)

Robbie Harrington

F/V Dawn

3/30/2018 12:15:24 PM

My name is Robbie Harrington – I and my entire crew on the 92 foot trawler F/V Dawn live in Kodiak and our boat is 100% dependent on the Kodiak trawl fisheries. We don't have anywhere else to go to fish. I started running the Dawn back in 2015 and experienced first-hand the May flatfish closure of that year due to hitting the new Chinook cap of 2,700 salmon. The closure hit our business and our crew hard – it would have been worse without the Emergency Rule which reopened the fisheries later in August. We support increasing this cap by 1,000 fish to give more of a

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buffer given the unpredictability of Chinook bycatch, the way they are estimated by small basket samples and the new observer data from the <60' WGOA fleet which was not available back in 2013 when these caps were chosen by the Council. Observer data from that fleet now show that they catch a lot more Chinook in their A Season cod fishery than the data showed back when the Council was debating this issue in 2012-13. The Kodiak fleet fishes non-pollock all year unlike the Sand Point fleet so this affects us more than the WGOA boats most of which also fish pot cod and salmon. Also, looks like most of Chinook are hatchery fish, not wild Alaska stocks. Please increase the non-pollock, non RP Chinook cap by 1,000 fish. Thanks for your effort in this,

Paul Moore

F/V Laura

3/30/2018 1:43:35 PM

Being a commercial fisherman for several years now I can say that they need to revamp how they take their samples because there is no way the % of chinook they say are being are actually being caught. It is frustrating to see one or two tows effect the whole fleet's numbers for the season. I understand that one bad apple may spoil the bunch, but I also believe in being accountable for your catch and I also believe the catch that we are being given are far too low and some proper form a sampling and putting that sampling to proper use is in order if we ever truly want to get a grasp and have a proper monitoring/sampling system that truly benefits the community, environment, the fish, and the fishermen...maybe it's just wishful thinking if a fisherman. Cheers Kodiak!!!

Attachments: [474D459F-0233-4565-A80E-1B5E9BA8C3D5.jpeg](#)

Devon Miller

wrangell resident

3/14/2018 7:51:58 PM

this is not ok!!!! all of us here in southeast are shut down and tied to the dock and unable to fill out freezers to live a subsistan life style! we in SouthEast need these fish to be able to live here!!!! shut it down it is nolonger about makeing money it's affecting life styles.

Glenn Haight

NPFMC

3/21/2018 1:39:17 PM

Attachments: [March 21 2018 BOF letter to NPFMC on Gulf of Alaska PSC limits.pdf](#)

Dugan Daniels

Se alaska salmon troller

3/26/2018 6:04:48 PM

I am against any increase in King salmon retention by the trawl fleet. I am a salmon fisherman in Se alaska my winter king salmon fishery has been shut down my spring fishery has been shut down last summer I was given four days of king salmon fishing to make a living tosee a suggested increase in trawl king salmon bycatch is one of the stupidest ideas I have read to date. As responsible stewards of the ocean and future generations I find it very unacceptable to even consider the idea of increasing trawl bycatch when we are experiencing stock of concert issues in Se alaska Cook Inlet and several other areas on the west coast. I urge you to be smart and make the right choice

James Carter Hughes

3/27/2018 10:21:46 PM

March 28, 2018 Chairman Hull and members of the North Pacific Fisheries Management Council (NPFMC): My name is Carter Hughes and I wrote to you in February 2018 requesting that the NPFMC not increase the Prohibited Species (PS) catch levels of chinook salmon in the Gulf of Alaska (GOA) non pollock non rockfish trawl fisheries. I am writing to the NPFMC again requesting the same action option be selected. I support no action on agenda item C 6. I am a salmon troller based out of Sitka Alaska. As you should know by now, all South East Alaska (SEAK) fisheries that harvest king salmon are under severe restrictions from the Alaska Department of Fish and Game (ADFG) this year and probably for the next few years. The restrictions are causing economic hardship to this region. For the most part, all of us are supporting the restrictions because we understand the conservation concerns are real. The troll fleet is being shut down for the last 6 weeks of the winter fishery. The spring fisheries will be significantly reduced. All SEAK gear groups, including troll, gillnet, seine, sport and subsistence fishing are being restricted to conserve chinook that return to rivers in the SEAK region. The trawl fisheries requesting the increase of PS chinook catch take an unknown number but 14% is the lowball proportion of their total catch I have read. That still amounts to hundreds of fish and the Troll fleet lost 30,000 kings from their fishery last summer to pass about 160 chinook to the streams in SEAK. Further, the SEAK quota number that is dictated by the Pacific Salmon Treaty (PST) is likely to see even further

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restrictions imposed by ADFG so that chinook may be passed through to British Columbia (BC) to help alleviate poor returns in that region. These pass through restrictions are above and beyond the requirements of the PST. The largest portion of the GOA trawl chinook bycatch comes from BC. If coastal communities in SEAK are being curtailed to protect runs from BC to Yakutat Alaska, then any increase in the GOA trawl bycatch of chinook is inappropriate. This discussion should never have advanced this far. Hopefully the Alaska contingent of the NPFMC will support the conservation actions that have been implemented by ADFG and the Alaska Board of Fish. Thank you Kenny Down for your loan vote in February. James Carter Hughes FV Astrolabe Sitka

Gary Mulligan

Fisherman

3/27/2018 12:47:32 PM

Considering the poor condition of many Alaskan and Canadian King Salmon runs, it is irresponsible and dangerous to the viability of these stocks, for any increased King Salmon trawl bycatch allowance!

Nathan Moulton

Yakutat Tlingit Tribe

3/29/2018 6:26:18 PM

Yakutat Tlingit Tribal Council Resolution #2018-10. Opposition to any alternatives that would increase bycatch limits of Chinook salmon.

Attachments: [2018.10.pdf](#)

Rebecca Skinner

Alaska Whitefish Trawlers Association

3/30/2018 12:24:44 PM

Attachments: [C6 GOA Chinook PSC Alaska Whitefish Trawlers Comments \(03-30-18\).pdf](#)

Patrick O'Donnell

F/V Caravelle

3/30/2018 12:29:45 PM

Attachments: [C6 Chinook Comments ODonnell April 2018.doc](#)

Paul Olson

self

3/30/2018 12:34:17 PM

11:20 a.m., March 30. Dear Chairman Hull: I am a commercial power troller and have fished for Chinook continuously since 1994. Most power trollers are heavily dependent on the Chinook resource - for many of us, the currently closed period of April through June can account for as much as 50 percent of our ex-vessel value in part because of the high value of individual Chinook salmon (roughly \$100 - \$130 per fish depending on size and price fluctuation) and in part because of the extended opportunities to fish. Some of us with office or trade skills may be able to pay our bills with less lucrative work, but the majority of the 600 fishermen who operate during this closed period rely exclusively on trolling with very limited opportunity to mitigate the closure because commercial fishing is the primary employment sector in southeast Alaska coastal communities. So the hardship borne by Chinook fishermen is neither hypothetical nor prospective, but rather real and immediate. This hardship also applies to resident processing workers who would normally be working dockside taking weekly or even more frequent deliveries from hundreds of trollers. I have serious concerns about any further action on this agenda item under the National Environmental Policy Act (NEPA). The analysis states that previous analyses have considered higher levels of Chinook take in the groundfish fisheries. But these analyses predated the recent Chinook salmon crisis in southeast Alaska. Under these circumstances, it would seem incumbent upon NMFS to prepare a supplement information report that evaluates the conclusions in the previous analyses relative to current stock status. In particular, the take of small numbers of fish may prolong or prevent recovery and impose long-term restrictions on directed fisheries and potential harm to the resource itself. This evaluation may require revisiting all PSC limits in the Gulf of Alaska. Whatever the result, the need to undertake ongoing efforts to evaluate the efficacy of previous actions over time is a NEPA obligation. Another NEPA obligation is the requirement to consider a reasonable range of alternatives. One of the driving factors in determining what is reasonable is the agency's substantive statutory mandate. In this case, the Magnuson Stevens Act imposes an obligation to minimize bycatch under National Standard 9. NMFS' proposal to "modify" the PSC limits does not meet this standard. NEPA certainly allows the Council and NMFS to consider a variety of ways to address Chinook PSC in the Gulf of Alaska. But NEPA does not permit moving forward with an analysis that excludes alternatives that would minimize PSC, as required by the Magnuson-Stevens Act. In sum I reiterate from my February letter on this issue a

request to cease planning on any action to increase Gulf of Alaska Chinook PSC limits. If the Council does move forward with further analysis, there must be alternatives that reduce PSC, even if using benchmarks that tier to resource recovery over time. Anything short of that would violate NEPA. As a final note, numerous trollers are aware of and thankful for Council member Kenny Downs comments on this issue at the February meeting, which recognized that the 12 individual letters and 5 organizational letters from southeast Alaska Chinook stakeholders represented hundreds of fishermen. This number probably includes not just the 1,000 active trollers, but also gillnet fishermen, resident sport and guided charter fishermen and related businesses who are all facing greatly reduced access or massive unprecedented closures.