

**On-Time Public Comment List
Chignik Finfish
December 5–6, 2013**

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Mori Jones
100 Shipyard Rd.
Decatur Island
Anacortes, WA 98221-9401



November 18, 2013

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: Chignik Proposal #42 (25 Fathom Seine Length Increase)

Dear Board of Fisheries Members:

I am opposed to Proposal #42.



I have fished the Chignik Area for fifty years; Chignik area is the only area to my knowledge that is unique in that the area supports both a shallow lagoon fishery as well as an outside cape fishery.

Chignik Lagoon provides strictly a shallow draft boat fishery. Most of the larger boats now fishing the Chignik area do not operate in the lagoon because of its shallowness; they strictly fish the cape areas in the outer Chignik districts.

The proposed increase in seine length would be a hardship on the Chignik's small boat fleet because simply their boats could not handle the additional gear and weight. And thus it would give the larger boats an unfair advantage over the smaller boats with the increased efficiency of a longer seine.

Chignik has always been a small boat fishery. In my many years of fishing Chignik, I have fished both the lagoon and the outside capes. Right now every fisherman has the ability to fish either the lagoon or the outside capes, with weather being the only factor that would prevent some smaller boats from fishing outside the lagoon. If you change the seine length this would split the fishery, and possibly change the harvest practices in both the lagoon and the outside waters, thus causing conflicts within the whole fishery.

If a fisherman wants a bigger vessel for weather so be it, but he doesn't need a bigger seine; the larger boats already have the advantage of being able to operate in weather that many of the smaller boats can't fish in.

The gear specifications and limits in Area M and Kodiak have no bearing on us, and we do not need to conform to the gear standards in those areas. The current gear limits in the Chignik salmon fishery are fair and have historic standing.

We are and always have been a shallow lagoon fishery first and outside cape fishery second; please do not penalize our small boat fleet by passing Proposal #42.

Once again, I am opposed to Proposal #42.

Most sincerely,


Mori Jones



Alaska Whitefish Trawlers Association

PO Box 991

Kodiak, AK 99615

Proposal 43 Oppose

Proposal 44 Oppose

Proposal 45 Oppose

The Alaska Whitefish Trawlers Association (AWTA) is located in Kodiak and represents the majority of independently owned trawl vessels that harvest groundfish in the Central Gulf of Alaska (CGOA). Our member vessels also harvest groundfish in the Western Gulf of Alaska (WGOA) and Bering Sea (BS).

Proposals 43 & 44

We oppose these proposals that would create a new state waters non-pelagic (bottom) trawl fishery for all species of groundfish (Proposal 43) or for Pollock (Proposal 44) in the Central and Western Gulf of Alaska.

- There is no mechanism for the management of Prohibited Species Caps (PSC) inside state waters. Halibut, Tanner Crab and Chinook salmon resources would be compromised by this new increased effort inside state waters. A large and complex system for the monitoring, assessing, reporting and management of PSC inside state waters would have to be developed. The development of this program would demand a significant amount of time, work by ADFG personnel and money.
- There is no observer program for fisheries inside state waters. This proposal calls for 100% observer coverage inside state waters with the cost being paid by the vessels. While the cost for the onboard observers could be paid for by the vessels, the entire state-run management structure required to manage a new observer program would have to be funded by the state at significant cost
- The movement of 25% of the massive stocks of Pollock, Rockfish, shallow-water flatfish and deep-water flatfish from Federal to State waters and designating it for harvest only by vessels under 58' in length is a direct re-allocation from one user group to another.
- There are only two (2) under 58' vessels that are home-ported in Kodiak and fish primarily in Central Gulf of Alaska. These proposals would take access to 25% of all groundfish (proposal 43) or Pollock (Proposal 44) in the Central Gulf away from the 35+ trawl vessels and grant access to these two vessels.
- It is impossible for two under 58' vessels to harvest the TAC's of all groundfish in the Central Gulf of Alaska. It is likely that enormous amounts of groundfish would not be harvested every year with the resulting lack of revenues for historic trawl vessels, their processors and the community infrastructure that supports these fisheries.
- There is a large group of less than 58' trawl vessels that fish in the Western Gulf of Alaska and a many of these vessels have Central Gulf of Alaska endorsements. Since it is impossible for 2 vessels to harvest the TAC's in the CGOA, it is likely that these WGOA vessels would move into the CGOA and target groundfish. Again, this is a direct reallocation from one user group to another, this time from the historic Kodiak fleet to the under 58' Sand Point and King Cove fleets
- CGOA trawl vessels and their associated processors have worked together to develop business plans for the harvest and processing of groundfish. Any reallocation to other user groups will disrupt these long-established relationships.
- CGOA trawl vessels have built relationships with support business and vendors and any reallocation will have a significant impact on these other businesses...
- The city and borough of Kodiak have invested heavily in infrastructure (harbors, shipyard, etc.) and they depend on the revenues that flow from the trawl fleet. Any reduction of groundfish to the trawl fleet will have a significant impact on Kodiak.
- All federal participants have made substantial investments in gear and technology to harvest groundfish while minimizing bycatch. Any reallocation that limits access to the resource will lead to excessive stranded capital for these fleets.
- Temporal and Spatial measures have been taken to protect Stellar Sea Lions. All groundfish harvests are split into different seasons with specific PSC caps established for each season within each fishery. Areas around rookeries and haul-outs have been closed. Having more harvest come out of the sensitive near-shore state waters will likely result in a Section 7 consultation of the SSL protection measures.
- The North Pacific Fisheries Management Council is moving forward with the development of a new management structure for trawl fisheries in the Gulf of Alaska. The interaction between federal and state-waters is an important component of the management structure. Any changes in the federal/state-water relationship need to be conducted within that process.
- ***This proposal was submitted by an under 58' vessel that is a new entrant into Gulf of Alaska trawl fisheries with very little history. This proposal is aimed at dis-enfranchising vessels with long-term histories of participation in, and dependence***



Proposal 45

We oppose this propose that would require 100% observer coverage for trawl vessels targeting groundfish inside state waters.

- The North Pacific Groundfish and Halibut Observer program has been in place since the beginning of 2013. It has extended observer coverage to not only the trawl fleet but also to other sectors that impact our important fisheries resources. This is a very complex program developed over a number of years and it is unrealistic to create a new state designed, implemented and managed observer program inside state waters within any reasonable time frame.
- The North Pacific Fisheries Management Council has already begun the process of developing a new trawl management program in the Gulf of Alaska. One of the requirements in this new program will be 100% observer coverage.
- The GOA trawl industry has been the subject of numerous Prohibited Species Cap (PSC) reductions over the past few years. There has been a reduction in the Halibut PSC cap as well as the establishment of reduced caps for Chinook salmon in both our Pollock and non-Pollock fisheries trawl fisheries. There has also been action taken to require new modified trawl sweeps for all vessels targeting flatfish as well as an area closure in the Marmot Bay area.

The established trawl industry in the Gulf of Alaska is comprised of harvesting vessels, processors, vendors and communities that support this industry. Working together, the trawl industry delivers large volumes of groundfish that provide fish for the processors, employment opportunities of processor workers, and economic benefits to local vendors as well as our coastal communities. The trawl industry is a major economic engine which provides tremendous economic and social benefit to the State of Alaska and those who live here.

AWTA asks that the Board reject proposals 43, 44, and 45. We also ask that the Board work alongside the North Pacific Fisheries Management Council and the GOA trawl industry as the new fishery management structure is developed.

Best Regards,

Robert L. Krueger, President

Alaska Whitefish Trawlers Association

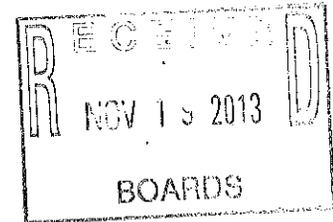
Robert.Krueger@alaskawhitefishtrawlers.org

November



PC 3
1 of 1

**Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526**



Subject: Chignik Salmon Proposal #42

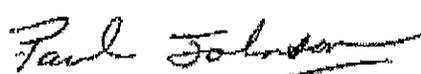
Dear Board of Fisheries:

I am Paul Johnson and have fished salmon in Chignik for 46 years. I have run my own boat for the last 36 years. Chignik has fished the same seine length for as long as I have been there. The fleet in most cases has designed their equipment to fit the need to fish both inside and outside of Chignik Lagoon. The majority of the Chignik fleet is made up of smaller boats. It takes considerably more deck space to add an extra 25 fathoms of seine gear. In most cases this would put the smaller boats at an unfair advantage in competing against the larger boats. Further, most of the large boats are newbies to the Chignik fishery. If proposal #42 were to become law, it would expectedly encourage overcapitalization and an influx of larger out-of-area boats to the Chignik salmon fishery.

There is also the consideration of safety. Larger seines and the requirement for RSW could well be a stability problem for many the smaller boats.

Lastly, allocating fish from one user group to the other would likely occur by permitting longer seines in our fishery, and this especially would be unfair to our local lagoon fleet.

For these reasons, I ask that you reject Proposal #42.

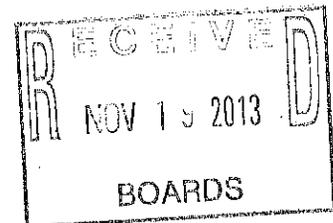
Thank you, 
**Paul R Johnson
102 Shipyard Rd.
Decatur Island, WA 98221**



Paul Olson, Attorney-at-Law
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November 19, 2013

Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526, Juneau, AK 99811-5526
Fax # (907) 465-6094
www.boardoffisheries.adfg.alaska.gov
Attn: BOF COMMENTS



Re: Proposal No. 45

Dear Alaska Board of Fisheries:

Thank you for the opportunity to comment on Proposal No. 45, which would require 100 percent observer coverage on groundfish trawl vessels in state waters of the Cook Inlet, Kodiak and Chignik management areas. I submit the following comments on behalf of The Boat Company (TBC). TBC is a tax exempt, charitable, education foundation with a long history of operating in southeast Alaska. TBC conducts multi-day conservation and wilderness tours in southeast Alaska aboard its two larger vessels, the 145' M/V Liseron and the 157' M/V Mist Cove. TBC's clients participate in a variety of activities that include environmental education, kayaking, hiking and beachcombing as well as sport fishing for halibut and Chinook from smaller vessels. The socio-economic health of Southeast Alaska communities depends on Chinook and halibut fisheries for commercial and guided sport fishing, unguided sport fishing and subsistence.

As a result, long-term conservation of these unique fishery resources is one of TBC's most important programs. Over the past decade, trawl bycatch has become increasingly significant as halibut and Chinook stocks have declined and there is considerable uncertainty about the amount of halibut and chinook actually wasted as bycatch in trawl fisheries. TBC strongly supports Proposal 45 because 100% observer coverage in trawl fisheries is necessary to enable the collection of statistically reliable bycatch data that are essential to addressing uncertainties with regard to the cumulative effects of halibut and Chinook bycatch on long-term conservation of those resources. Proposal 45 mirrors efforts by trawl fishery managers in the Bering Sea, British Columbia and other Pacific Coast states to implement high levels of observer coverage that respond to the scale and variability of trawl bycatch as well as the impacts on other users of these important fishery resources. Finally, Proposal 45 is consistent with the Board of Fisheries' purpose of conserving Alaska's fishery resources.¹

¹ See AS § 16.05.221; see also *Kenai Peninsula Fisherman's Coop. Ass'n v. State*, 628P.2d 897, 902 (Alaska 1981)(explaining that "conserving" implies controlled utilization of a resource to prevent its exploitation, destruction or neglect").



I. ISSUE

The Board of Fisheries can require an on-board observer program upon finding, among other things, that the program is the only practical data-gathering mechanism.² The following comments pertain primarily to the Board's findings regarding the data-gathering mechanism; TBC submits that increased monitoring through on-board observers is the only method available to address the significant uncertainties regarding the amount of halibut and Chinook bycatch in the Gulf of Alaska and the impacts of that bycatch on important state commercial, recreational and subsistence fisheries.

Observer programs are "widely recognized as the best way to obtain reliable information about bycatch" and "in the majority of instances, [are] the most effective way to monitor bycatch."³ High coverage levels are most important when low levels of mortality may jeopardize the recovery of at-risk species, when fisheries management requires statistically reliable and timely bycatch data, and when the bycatch is an important species targeted by other fishermen.⁴ All of these factors are relevant to the bycatch of halibut and Chinook in Gulf of Alaska trawl fisheries.

In general, north Pacific trawl fisheries require 100% observer coverage - International Pacific Halibut Commission (IPHC) regulatory areas 2A (Washington, Oregon and California coasts), 2B (British Columbia) and 4 (Bering Sea/Aleutian Islands) all implement 100 percent observer coverage for trawl fisheries.⁵ The primary exception is the federal groundfish fishery in the Gulf of Alaska, which currently implements between 13 - 15% observer coverage rates for trawl fisheries. The amount of bycatch in state waters is estimated based on data gathered from the federal fishery.⁶ The low level of observer coverage in the Gulf of Alaska reduces the availability of statistically reliable data needed for the sustainable management of important commercial, sport and subsistence fishery resources such as halibut and Chinook salmon. The North Pacific Fishery Management Council seems to recognize that 100% observer coverage for Gulf of Alaska trawl fisheries is a key component of a comprehensive bycatch management program.⁷ But NMFS does not have any regulatory proposals pending to implement this industry standard in the near future, heightening the importance of a state observer program.

² See AS § 16.05.251(13).

³ See, e.g. Magnuson Stevens Act Provisions, Subpart H, General Provisions for Domestic Fishing. 68 Fed. Reg. 11501, 11504 (March 1, 2003); Babcock, E. & E. Pikitch. 2003. How Much Observer Coverage is Enough to Adequately Assess Bycatch? Oceana, Washington D.C. at 18.

⁴ Babcock, E. & E. Pikitch. 2003 at 4-5, 12.

⁵ Raab, J. & S. Stern. 2013. NPFMC/IPHC Workshop on Halibut Bycatch Estimation, Halibut Growth and Migration & Effects on Harvest Strategy: Meeting Summary at 277. In: Int. Pac. Halibut Commission Report of Assessment and Research Activities 2012: pp. 267 - 314. Available at http://www.iphc.int/publications/rara/2012/rara2012267_bycatchworkshop.pdf

⁶ *Id.* at 291.

⁷ See North Pacific Fishery Management Council, 2013. Motion on C-5(a) Gulf of Alaska Trawl Bycatch Management at 1 (October 5, 2013). Available at <http://alaskafisheries.noaa.gov/npfmc/PDFdocuments/bycatch/GOAtrawlDesignMotion1013.pdf>



Historically, the majority of vessels participating in Gulf of Alaska federal groundfish fisheries had either 30 percent observer coverage rates or did not carry observers at all.⁸ Thus, historical bycatch estimates reflect data extrapolated from the 30 percent coverage fleet which altered fishing practices when observers were onboard, causing significant uncertainty about the accuracy of bycatch estimates.⁹ This problem is known as the "observer effect" and reflects studies showing that the presence of onboard observers results in different fishing behaviors on observed vessels in terms of where to fish, what to target, how to deploy gear and how crew members handle bycatch species.¹⁰ Researchers have identified significant differences in particular from groundfish trawl fisheries showing that observed data is not representative of the fleet as a whole.¹¹ This means that bycatch rates estimated from observed trips may not accurately reflect actual bycatch by unobserved vessels, resulting in unreliable estimates.¹²

According to scientists from the International Pacific Halibut Commission (IPHC) other groundfish trawl monitoring programs "have not contemplated the form of incomplete coverage seen historically for the [Gulf of Alaska] groundfish fisheries."¹³ IPHC scientists have explained that "estimates for these fisheries can be considered to be only a minimum estimate of total halibut mortality."¹⁴ Similarly, for Chinook salmon, a 2009 ADF & G study noted that an independent review of reported Chinook bycatch estimates in the pollock trawl fishery were consistently and considerably underestimated.¹⁵ A significant concern regarding declines in these fishery resources is uncertainty about bycatch estimates and a need for better data to inform the development of measures that avoid and minimize bycatch in the trawl fisheries.

II. WHAT WILL HAPPEN IF NOTHING IS DONE?

The proposal explains that if observer coverage is not increased to 100%, fishery managers will lack accurate estimates of bycatch amounts, and management decisions will not be informed by reliable data and will continue to have an incomplete understanding of the levels of mortality and impacts of bycatch on Chinook, halibut and other important state fishery resources. Over the past decade, estimated Gulf of Alaska trawl chinook bycatch has been as high as 54,000 fish and halibut bycatch mortality in the trawl fisheries from 2002 - 2011 exceeded 22 million net pounds.¹⁶

⁸ NMFS, 2011. Secretarial Review Draft; Proposed Amendment 86 to the Fishery Management Plan for the Bering Sea Aleutian Islands and Proposed Amendment 76 to the Fishery Management Plan for the Gulf of Alaska. Alaska Region Office, Juneau, AK at 10.

⁹ Raab, J. & S. Stern. 2013 at 277.

¹⁰ *Id.* at 276-277.

¹¹ Sampson, 2002. Final Report to the Oregon Trawl Commission on Analysis of Data from the At-Sea Data Collection Report. Oregon State University, Newport, Oregon.

¹² Babcock, E. & E. Pikitch. 2003 at 7.

¹³ Raab, J. & S. Stern. 2013 at 277.

¹⁴ Williams, G. 2011. Incidental Catch and Mortality of Pacific Halibut 1962 - 2011. In: Int. Pac. Halibut Commission Report of Assessment and Research Activities 2011: pp. 381 - 389.

¹⁵ Pella, J.J., and H.J. Geiger. 2009. Sampling considerations for estimating geographic origins of Chinook salmon bycatch in the Bering Sea Pollock fishery. Alaska Department of Fish and Game, Special Publication No. 09-08, Anchorage.

¹⁶ See <http://alaskafisheries.noaa.gov/sustainablefisheries/inseason/goasalmonmort.pdf>; Williams, G. 2011 at 384, 388 (adding that limited observer coverage in the Gulf of Alaska renders the estimates unreliable).



The absence of statistically reliable bycatch data will thus further impede efforts to ensure the recovery of Gulf of Alaska halibut and Chinook populations.

The recent decline in Chinook salmon abundance has led to social and economic hardships in Alaska communities as Alaska has had to implement increasingly restrictive management measures to address the downward trend.¹⁷ 2007 – 2011 average subsistence harvests declined 12% relative to 1994 – 2006 average harvest levels and commercial and sport harvests experienced even larger reductions.¹⁸ The majority of salmon taken in Gulf of Alaska groundfish fisheries are primarily taken in the trawl pollock fishery and estimated trawl bycatch of Chinook in the Gulf of Alaska increased by nearly a third even as directed fishery harvests declined.¹⁹

Better data about Chinook stock composition and bycatch levels in the trawl fishery is thus necessary to evaluate whether trawl fishery bycatch may be impacting salmon returns or contributing to local population depletions. Statistically reliable estimates require higher levels of observer coverage for species with highly variable catch rates such as Chinook.²⁰ During the 1990s, Alaska Fishery Science Center and contracted scientists evaluated the precision of bycatch estimates at different levels of observer coverage in numerous Bering Sea and Aleutian Islands groundfish fisheries.²¹ Estimates of salmon bycatch in the Pollock fisheries required 90 – 100% observer coverage to be reasonably precise.²² A subsequent study also concluded salmon bycatch estimates for management purposes can be generated from heavily observed fleets when a high percentage of hauls (60 – 70%) are sampled.²³

Because high coverage levels are needed, a 2009 review of salmon bycatch estimation in the trawl fisheries recommended a census approach to estimating bycatch numbers because it is “simple, easy to explain, and has the advantage that it is free of sampling error.”²⁴ Amendment 91 for the Bering Sea Chinook bycatch program mandated 100 percent observer coverage and required a census of Chinook salmon in every haul or fishing trip so that every salmon caught in the Pollock fishery is counted.²⁵ NMFS recognized that this measure “ensure[s] that the appropriate conservation and management measures are adequately applied to Chinook salmon

¹⁷ Alaska Department of Fish and Game, 2013, Chinook Salmon Stock Assessment and Research Plan, 2013 at 1, 7. Alaska Department of Fish and Game Division of Sport Fish, Chinook Salmon Research Team Special Publication No. 13-01. Anchorage, AK: January 2013.

¹⁸ *Id.* at 7.

¹⁹ *Id.*

²⁰ Babcock, E. & E. Pikitch, 2003 at 5.

²¹ NMFS, 2011 at 173.

²² *Id.* at 173 – 174.

²³ Witherell, D., D. Ackely & C. Coon. 2002. An Overview of Salmon Bycatch in Alaska Groundfish Fisheries. Reprinted from the Alaska Fishery Research Bulletin, Vol. 9, No. 1, Summer 2002 at 55 (citing Karp, W.A. & H. McElderry. 1999 Catch Monitoring by Fisheries Observers in the United States and Canada. Nolan, C.P., ed. Proceedings of the International Conference on Integrated Fisheries Monitoring. Sydney, Aus. February 1999. Pp. 261 – 284.

²⁴ Pella, J.J., and H.J. Geiger, 2009 at 35.

²⁵ Fisheries of the Exclusive Economic Zone Off Alaska; Chinook Salmon Bycatch Management in the Bering Sea Pollock Fishery, Final Rule, 75 Fed. Reg. 53026, 53030 (August 30, 2012).



bycatch.²⁶ Proposal 45 would help to reduce the significant disparity between the low level of chinook bycatch monitoring in the Gulf of Alaska and the Bering Sea trawl fisheries.

There are also significant concerns about the long term health of the halibut resource and how trawl bycatch – particularly of juvenile halibut - affects the ability of the resource to recover from the current and steep decline in the exploitable biomass. 100% observer coverage for trawl fisheries with halibut bycatch issues is consistent with the recommendations of expert scientists from the IPHC and other trawl fishery observer programs. Analyses done by Alaska Fisheries Science Center staff in the early 1990s to assess halibut bycatch showed that "essentially 100% observer coverage is needed" to estimate and manage halibut bycatch.²⁷ The level of precision needed to measure halibut bycatch is quite high because of resource uncertainties, the volume of halibut taken as bycatch and the variability of bycatch rates.²⁸

The IPHC has stated that improved estimation of halibut bycatch mortality is important in the Gulf of Alaska because the ratio of halibut mortality to groundfish catch is more than twice as high as the ratio in the Bering Sea fisheries.²⁹ Two of the critical problems with the existing estimates are the observer effect on bias (changes in fishing behavior) and incomplete observer coverage.³⁰ It is extremely difficult to fully account for the magnitude of statistical bias caused by incomplete coverage and observer effect.³¹ Consequently, IPHC experts question whether statistically reliable estimates can be obtained from partial observer coverage programs and recommend 100% observer coverage to address statistical bias and to improve the accuracy of bycatch estimates.³²

III. WHO IS LIKELY TO BENEFIT: FISHERY AND ECONOMIC BENEFITS

Proposal 45 proponents indicates that a primary benefit of the 100% observer coverage requirement will be that the state will benefit from having better data and chinook, halibut and crab user groups will benefit from better information about bycatch levels. TEC adds that there is another likely and direct benefit to Alaska's fishery resources because 100 percent observer coverage also minimizes both bycatch and bycatch mortality - positive environmental benefits that would result from the effect of observers on fishing practices and more careful handling of bycatch species. Fishery managers who implement 100 percent coverage programs cited the 100% observer coverage level as a specific tool to minimize bycatch in trawl fisheries in British Columbia, the Pacific Northwest and Bering Sea.³³ For example, a group of Bering Sea trawlers reduced their halibut bycatch by 40% during implementation of

²⁶ *Id.*

²⁷ Dorn, M.W. 1992. Analysis of Levels of Observer Coverage. Internal Memorandum, Alaska Fisheries Science Center. Seattle, WA (on file with TEC).

²⁸ Babcock et al, at 12 (citing Karp and McElderry 1999).

²⁹ IPHC, 2011. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration at 2-3.

³⁰ Raab, J. & S. Stern. 2013 at 276-277.

³¹ *Id.* at 278.

³² *Id.*

³³ *Id.* at 283-284.



the 200 percent observer coverage program by changing fishing practices such as using exploratory tows and shorter tow lengths.⁸⁴ Canadian fishery managers also cited more careful handling practices that resulted in a discard mortality rate that is significantly lower than in Alaska.⁸⁵ In sum, 100 percent observer coverage for trawl fisheries will benefit state halibut and chinook fisheries not only by improving fishery management, but also by actually decreasing bycatch and bycatch mortality.

IV. CONCLUSION

Thank you for considering these comments and TBC urges you to move forward with implementing Proposal 45.

Sincerely,

Paul Olson

⁸⁴ *Id.* (200 percent observer coverage means there are two on-board observers so that there is ongoing coverage of vessel activities and more complete haul sampling).

⁸⁵ *Id.*



Groundfish Data Bank

Alaska
BYSAFA

PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

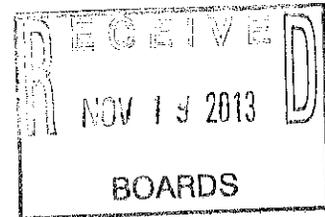
Julie Bonney, Executive Director jbonney@gei.net
Katy McGauley, Fisheries Biologist agdb@gei.net



Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Re: Proposals 43-44-45

November 19, 2013



Dear Chairman Johnstone and Board Members,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and catcher vessels home ported in Kodiak that participate in the Central Gulf of Alaska (CGOA) groundfish trawl fisheries.

This letter expresses our opposition to proposals 43 -45. We ask that the Alaska Board of Fish (BOF) reject these proposals and instead work with the North Pacific Fishery Management Council (Council) and the GOA trawl industry stakeholders to develop a Gulf of Alaska trawl bycatch management program. Any program developed within the Council process will require input from and coordination with the BOF to address the interrelationships between state-waters, parallel and federal fishery zones. We are asking that you join us in developing a vision for a new fishery management structure that will allow our industry to effectively manage and reduce bycatch while meeting optimum yield for groundfish harvests - a management plan that holds each individual vessel accountable for their fishing behavior. We are asking that you allow this process to play out and not disrupt our industry in the short term by adopting any of these proposals.

Attached for your information is the Council purpose and need statement/Goals and Objectives (appendix A) for the new program and the Council initial program design motion (appendix B) which will be used to focus public input for development of program alternatives and options. Both these documents demonstrate the vision under construction for our industry. Also attached for your information is the Council's Bycatch Reduction Flyer underscoring the industry's need for additional tools.

Specific comments for each proposal:

Proposal 43 – this proposal would create state-water management plans for all groundfish species in the Cook Inlet, Kodiak and Chignik management areas for non-pelagic trawl vessels 58 foot and less.



- The Pacific cod resource, both federal and state, are fully allocated and subscribed. A separate state-water Pacific cod non-pelagic trawl fishery would increase the total amount of Pacific cod ABC allocated to state-water fisheries. The BOF at their recent Oct 18 – 22 meeting addressed the allocations for state cod fisheries. Revisiting the cod allocations between state and federal fisheries now is completely out of cycle with the prior decision making process and should be rejected.
- It is impossible to harvest 25% of all groundfish ABC's within three miles. Based on table 43-1 (staff comments) harvest in the CGOA for groundfish taken with non-pelagic gear inside three miles is less than 8 million pounds over the time period 2000-2012 (averaging about 615,000 lbs per year). This compares to a potential annual State waters allocation of 133 million pounds based on 25% of the current, respective groundfish ABCs.
- It is unclear whether the proposal would open additional areas inside three miles to allow for additional harvesting opportunities for groundfish with non-pelagic trawl gear. While the trawl industry in general is supportive of additional access to these fishing grounds, a thoughtful, research driven approach via a commissioner's permit is the appropriate vehicle - not this proposal.
- The Department of Fish and Game is opposed to this proposal.

Proposal 44 – this proposal would create state-waters management plans for Pollock in the Cook Inlet, Kodiak, and Chignik management areas for vessels 58 feet or less.

- Increasing Pollock catch within Stellar Sea Lion critical habitat (zero to three miles) will most likely require a reconsultation under the Endangered Species Act (ESA). If a jeopardy determination is found, additional restrictions for federal fishing activity may result. During the 2010 reconsultation, the CGOA regulatory area barely escaped increased fishing restrictions similar to what occurred in the Aleutian Islands.
- This proposal redistributes access to the Pollock resource across users. The CGOA Pollock fleet consists of approximately 40 vessels, typically 4 of which are <58 feet in length. Note that these four <58' vessels all currently participate fully in the Federal GOA pollock fisheries. Allocating pollock between federal and state participants, large and small vessels, will not only impact individual harvesting vessel businesses but also their business partners -- processing companies, secondary fishery businesses and coastal communities. Reallocations of this type (potentially every 3 years at the BOF finfish meeting) would breed instability and uncertainty in GOA trawl fisheries, reducing investment for efficiency improvements and gear modifications. .
- It is difficult to understand how state quotas would be created. The proposal suggests 25% of the CGOA quota would be set aside for a new state Pollock fishery. Would there be some portion set aside for Cook Inlet, Chignik and Kodiak management areas? If so how would the Board decide? In the federal fishery, pollock is allocated seasonally across four quarters to mitigate impacts to Stellar Sea Lions. Would some type of seasonal structure be needed for the state fishery? Dividing the pollock quota between federal and state fisheries, then again by federal management areas and state management areas and finally into seasonal allocations for both jurisdictional fisheries could result in both federal and state fishery allocations too small to



manage. The potential is to go from the present eight allocation boxes in the CGOA federal fishery system to a possible 20 allocation boxes in a combined CGOA federal and state system.

- If the BOF develops new state water pollock fisheries it will fragment the pollock industry and frustrate our ability to meet bycatch management objectives. Some examples of the challenges include:
 - a. Fish do not understand the 3 mile line. This is exhibited in the tables in the staff document where inside and outside Pollock catch has ranged from a low of 5% to a high of 49% annually. When pollock catch per unit effort (CPUE) is high, bycatch is typically low. The fleet needs the ability to target areas of high pollock abundance with the associated low Chinook salmon bycatch to control and reduce bycatch.
 - b. The Bering Sea Pollock industry uses rolling seasonal hotspot closures to reduce salmon bycatch. The GOA industry hopes to develop a similar plan once a new cooperative fishery management structure is in place as in the Bering Sea fishery. The key for a rolling hotspot program is removing the race for both target and bycatch allocations along with the ability to move the fleet fluidly across the fishing grounds, 0 to 200 miles.
 - c. Cooperative management programs allow industry to develop contractual mechanisms to police the individual cooperative members. These co-op contracts are structured to benefit the entire group of co-op members as a whole versus individual members. State fisheries participants would be outside this self-policing mechanism.
 - d. Co-op contracts could address gear development and excluder use, fleet bycatch performance standards, incentives / penalties that address individual vessel fishing behaviors, and strategic fishing strategies.

- There would be significant costs incurred to the state of Alaska if this proposal is approved. The 100% observer coverage requirement would require the establishment of a state groundfish observer program. This would be duplicative to the federal groundfish observer program for the trans-boundary pollock stock. As the staff comments notes, this would require a substantial investment in time and resources for the state of Alaska. Maintaining a compatible state-water observer program would be necessary to provide the essential information needed for both catch accounting and stock assessments. Additionally, the federal program collects genetic tissue samples from Chinook salmon bycatch taken within the federal trawl Pollock fisheries. A companion genetic collection program would be necessary to understand stock of origin for bycaught Chinook if state pollock fisheries are created. Presently, the NMFS observer program is collecting all samples within the federal Pollock fisheries and NMFS Auke Bay laboratory is doing the genetic workup of these samples. The final cost element is the necessary personnel to manage these new state Pollock fisheries.

Proposal 45—this proposal would require 100% observer coverage for trawl vessels targeting groundfish inside state waters of the Cook Inlet, Kodiak and Chignik management areas.

The partial coverage portion of the newly restructured North Pacific Groundfish and Halibut observer program estimates total removals for the commercial fishing industry where the observed vessel data is extrapolated to the unobserved portion of the fleets. Estimates are stratified by target fishery, gear type and federal regulatory area. This new restructured program replaced the old Observer Program in 2012, improving the catch estimates and reducing the bias by requiring random trip or vessel selection.



Previously, for the partial observed vessels (the majority of the Kodiak trawl fleet), the operator chose when to take an observer on a trip.

It is unclear whether the proposal would create a state water observer program or whether the BOF would require federal observers to be on board vessel while fishing inside three miles. If a state system is created it would be a substantial financial investment by the State. It is unclear whether the State data would be incorporated within federal catch accounting system for bycatch and catch estimation processes or whether a separate state system would be necessary. This new data would over sample catch within three miles affecting the random data collection processes that are in place within the new federal program designed to estimate catch and bycatch for trawl fisheries in general. If the BOF requires vessels to carry federal observers within three miles then additional costs will be incurred not only by those vessels fishing inside three miles but also by NMFS. Cost estimates per fishing day for the vessels are underestimated in the staff analysis. Typical costs are \$500 to \$600 per fishing day and can be as high as \$1,000 per fishing day. Observer daily costs can also include travel costs, excessive baggage costs and cost for observer stand-down days due to weather, price negotiations, etc. The agency incurs costs due to observer training, briefing and debriefing, management of observer data and staff in general to support the overall observer program.

Additional observer coverage inside state waters will only affect the Chinook salmon bycatch data within the federal program since the vast majority of non-pelagic trawl harvests occurs outside three miles. Mid-water pelagic gear catches de minimis amounts of both crab and halibut so requiring 100% observer coverage will not affect the estimates for these PSC species in the overall federal catch accounting system. The vast majority of trawl harvests inside three miles consist of pollock taken with pelagic trawl gear. Thus additional coverage would only affect Chinook salmon PSC estimates. 100% coverage within 3 miles in the pollock target would remove the random nature of the present system, introducing a large bias into the estimates. Also, with the current race structure of the Federal pollock fisheries in the CGOA and large number of participants, the fisheries typically last only 3-10 days per season – with the operators racing for catch before the fishery closes, there is no time or incentive to game the observer system so observed trips are representative of actual catches.

The Council vision for a new GOA Trawl Management Program, includes a mandatory 100% federal observer coverage requirement, as it does in all other North Pacific trawl catch share programs. The 100% observer coverage requirement is necessary because each individual vessel will be held accountable for its bycatch performance versus the present system which holds the entire fleet to a fleet wide bycatch limit and where the behavior of one vessel operator can potentially shut down the entire fishery.

The Council has passed a series of actions to reduce bycatch in the GOA trawl fisheries. (See appendix C). Recent actions include a Tanner crab closure area near Marmot Bay, requiring modified sweeps for flatfish harvests, Halibut Prohibited Species Catch (PSC) reductions, and new Chinook salmon PSC caps for both the pollock and non-pollock fisheries. Industry believes that a new fishery management structure that creates additional tools is necessary to successfully address these bycatch reduction actions.

GOA Trawl Industry is making bycatch improvements:

The trawl industry continues to be proactive to understand the impact of our bycatch, mitigate the impact of our bycatch and develop tools to reduce bycatch.



The fleet is presently modifying their gear to add elevation devices to their sweeps in anticipation of a new regulation that requires the use of sweep modifications for flatfish harvests. These sweep modifications are intended to reduce gear impacts on bottom habitat and reduce crab bycatch mortalities.

All the Gulf of Alaska trawl groundfish processors and fishing vessels joined the Sea Share program in 2011. This year (2013) Sea Share has donated more than 34,000 pounds of finished product, both halibut and salmon bycatch, to food banks across Alaska from GOA trawl bycatch.

The Council and NMFS are collecting genetic information from the Chinook salmon bycatch in the pollock fishery to understand stock of origin and impacts to Alaska salmon runs. Industry has expanded genetic data collection to the CGOA shoreside catcher vessel rockfish fishery. Sample collections from the Rockfish Program landings include:

1. Tissue samples from all landed Chinook salmon for DNA and stock of origin analysis.
2. Biological data (weight, length, sex) from all landed salmon.
3. Scan all landed Chinook salmon for the presence or absence of adipose fin clips and Coded Wire Tags (CWT). This will allow for an estimation of Chinook bycatch that originate from hatcheries.
4. Collect CWT's (snouts) from all salmon with positive CWT signal.

Cooperative research partners for this initiative include NMFS groundfish observer program, NMFS Auke Bay Genetics laboratory, and the inshore CV rockfish cooperatives, all located in Kodiak.

The North Pacific Fisheries Research Foundation was awarded an Exempted Fisheries Permit to test Chinook salmon excluder devices for mid-water Pollock nets on "typical" Central Gulf of Alaska pollock trawlers. Two trials occurred in 2013 with two additional trials scheduled in 2014.

AGDB members respectfully request that the Board reject proposals 43, 44, and 45 and instead join with the NPFMC and the GOA trawl industry in developing a new vision for a new fishery management structure for our industry. We appreciate the opportunity to comment and look forward to engaging with the Board at the upcoming Chignik, Lower Cook Inlet and Kodiak finfish meetings.

Sincerely,

Julie Bonney
Executive Director
Alaska Groundfish Data Bank



Appendix A: North Pacific Fishery Management Council purpose and need statement/Goals and Objectives: GOA Trawl Bycatch Management

Purpose and Need Statement:

Management of Central Gulf of Alaska (GOA) groundfish trawl fisheries has grown increasingly complicated in recent years due to the implementation of measures to protect Steller Sea lions and reduced Pacific halibut and Chinook salmon Prohibited Species Catch (PSC) limits under variable annual total allowable catch (TAC's) limits for target groundfish species. These changes complicate effective management of target and non-target resources, and can have significant adverse social and economic impacts on harvesters, processors, and fishery-dependent GOA coastal communities.

The current management tools in the GOA Groundfish Fishery Management Plan (FMP) do not provide the Central GOA trawl fleet with the ability to effectively address these challenges, especially with regard to the fleet's ability to best reduce and utilize PSC. As such, the Council had determined that consideration of a new management regime for the Central GOA trawl fisheries is warranted.

The purpose of the proposed action is to create a new management structure which allocates allowable harvest to individuals, cooperatives, or other entities, which will eliminate the derby-style race for fish. It is expected to improve stock conservation by creating vessel-level and/or cooperative-level incentives to eliminate wasteful fishing practices, provide mechanisms to control and reduce bycatch, and create accountability measures when utilizing PSC, target, and secondary species. It will also have the added benefit of reducing the incentive to fish during unsafe conditions and improving operational efficiencies.

The Council recognizes that Central GOA harvesters, processors, and communities all have a stake in the groundfish trawl fisheries. The new program shall be designed to provide tools for the effective management and reduction of PSC and bycatch, and promote increased utilization of both target and secondary species harvested in the GOA. The program is also expected to increase the flexibility and economic efficiency of the Central GOA groundfish trawl fisheries and support the continued direct and indirect participation of the coastal communities that are dependent upon those fisheries. These management measures shall apply to those species, or groups of species, harvested by trawl gear in the Central GOA, as well as to PSC. This program will not modify the overall management of other sectors in the GOA, or the Central GOA rockfish program, which already operates under a catch share program.

Goals and Objectives:

1. Balance the requirements of the National Standards in the Magnuson Stevens Act
2. Increase the ability of the groundfish trawl sector to avoid PSC species and utilize available amounts of PSC more efficiently by allowing groundfish trawl vessel to fish more slowly, strategically, and cooperatively, both amongst the vessels themselves and with shore-based processors
3. Reduce bycatch and regulatory discards by groundfish trawl vessels
4. Authorize fair and equitable access privileges that take into consideration the value of assets and investments in the fishery and dependency on the fishery for harvesters, processors, and communities
5. Balance interests of all sectors and provide equitable distributions of benefits and similar opportunities for increased value
6. Promote community stability and minimize adverse economic impacts by limiting consolidation, providing employment and entry opportunities, and increasing the economic viability of the groundfish harvesters, processors, and support industries



7. Improve the ability of the groundfish trawl sector to achieve Optimum Yield, including increased product retention, utilization, landings, and value by allowing vessels to choose the time and location of fishing to optimize returns and generate higher yields
8. Increase stability relative to the volume and timing of groundfish trawl landings, allowing processors to better plan operational needs as well as identify and exploit new projects and markets
9. Increase safety by allowing trawl vessels to prosecute groundfish fisheries at slower speeds and in better conditions
10. Include measures for improved monitoring and reporting
11. Include the trawl sector's ability to adapt to applicable Federal law (i.e., Endangered Species Act)
12. Include methods to measure the success and impacts of all program elements
13. Minimize adverse impacts on sectors and areas not included in the program
14. Promote active participation by owners of harvest vessels and fishing privileges



Appendix B: North Pacific Fishery Management Council GOA Trawl Bycatch Management Program

C-5(a) GOA Trawl Bycatch Management Council Motion 10/5/13

The Council requests that the staff provide a discussion paper reviewing the program structure described below using the decision framework provided in the June 2013 'roadmap' document and the Council's purpose and need statement. The paper should evaluate whether and how the elements of this design address the objectives in the Council's purpose and need statement. The intent is to receive feedback characterizing: 1) how the fishery would operate under the new design; 2) how well it may meet the Council's stated objectives; and 3) which second-tier decisions are necessary to transform the program structure into alternative(s) for analysis. The paper should also include information on bycatch reduction results from other trawl catch share programs in the North Pacific and other regions.

GOA Trawl Bycatch Management Program

1. Bycatch Management

The primary objective of this action is to improve incentives for PSC reduction and PSC management, achieved in several ways through this program design.

- a. **Reduced PSC:** The Council intends to adopt a program to: (1) minimize Chinook salmon bycatch, and (2) achieve more efficient use of halibut PSC, allowing some efficiency gains to provide additional target fishery opportunity while leaving some halibut PSC savings in the water for conservation and contribution to exploitable biomass.
- b. **Duration of shares:** A portion of target species share allocations (maximum 25%) will be evaluated for retention based on achievement of performance targets relative to bycatch and other Council objectives after a set period of time (3-10 years). The time period and the criteria used to evaluate performance will be established in regulation.
- c. **Cooperative management:** A system of cooperative management is best suited to managing and reducing bycatch (such as, hotspot program, gear modifications, excluder use, incentive plan agreements) while maximizing the value of available target species. Cooperatives are intended to facilitate a flexible, responsive, and coordinated effort among vessels and processors to avoid bycatch through information sharing and formal participation in a bycatch avoidance program.
- d. **Gear modification. Option:** gear modifications for crab protection.

2. Observer Coverage

All trawl catcher vessels in the GOA will be in the 100% observer coverage category.

3. Areas

Western Gulf, Central Gulf, West Yakutat

4. Sector allocation of target species and PSC



Allocations for the trawl CP and CV sectors for WG and CG Pacific cod (Am 83), CGOA rockfish program (Am 88), and GOA pollock (Am 23) are maintained. Am 80 target sideboards and GOA flatfish eligibility are maintained. Allocate halibut and Chinook salmon PSC caps between CP and CV sectors.

5. Allocated species.

Target species are pollock and Pacific cod. PSC species include halibut and Chinook salmon.

6. Program structure for trawl catcher vessel fishery

Voluntary cooperative structure

- a. Allocate target species (pollock, Pacific cod) at the cooperative level, based on aggregate catch histories associated with member vessels' LLPs.
- b. Apportion halibut PSC and Chinook salmon PSC limits to each cooperative on a pro rata basis relative to target fisheries of GOA trawl vessels in the cooperative [such as, pollock Chinook salmon PSC cap divided based on pollock landings; non-pollock Chinook salmon cap divided based on non-pollock landings (excluding rockfish); halibut PSC apportioned in proportion to the cooperative's allocation of target species.]
- c. Participants can choose to either join a cooperative or operate in a limited access pool [sector-level, non-transferable target allocations and PSC]. Harvesters would need to be in a cooperative with a processor by a specified date prior to the season to access a transferable allocation of target species and PSC.
- d. Initial (2 years) cooperative formation would be based on the majority of a license holders' historical landings (aggregate trawl groundfish deliveries, excluding Central GOA rockfish harvested under a rockfish cooperative quota allocation) to a processor.
- e. Each cooperative would be required to have a private cooperative contract. The contract would require signatures of all harvesters in the cooperative and the processor (option: and community in which the processor is located). The contract would include clear provisions for how the parties may dissolve their contract after the first two years. If a harvester wants to leave that cooperative and join another cooperative, they could do so if they meet the requirements of the contract.
- f. Additional contract elements (such as bycatch management, active participation, mechanisms to facilitate entry, community provisions) may be required to ensure the program is consistent with Council objectives.

Option: Each processor controls a portion of PSC within the cooperative and negotiates terms of access through private agreement. The processor would activate the incremental PSC through NMFS, making it accessible to the cooperative. PSC made available by these agreements cannot be used by processor-owned vessels.

7. Fishery dependent community stability

- a. Consolidation limits
 - Vessel caps and limits on the percentage of the total allocation that a person can hold (accessible only through a cooperative).
 - Processor caps in each area (WG and CG).



- b. Target species quota would be regionalized (WG or WY/CG designation) based on historical delivery patterns.

Option: Target species CG quota that has historically been landed in Kodiak would have a port of landing requirement to be delivered to Kodiak; CG quota not historically landed in Kodiak would be regionalized (WG or WY/CG).

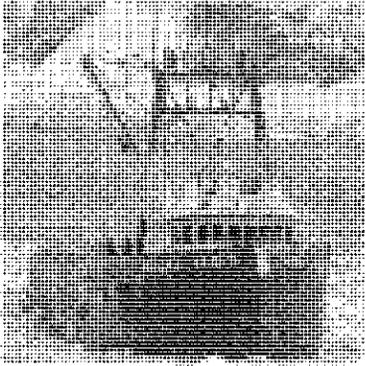
- c. Require individuals or entities to meet fishery participation criteria in order to be eligible to purchase an eligible license with associated history.

8. Transferability

- a. (Annually) Full transferability for annual use within the cooperative. Cooperatives can engage in inter-cooperative agreements on an annual basis.
- b. (Long-term) The LLP is transferable, with the associated history of the target species (which, when entered into a cooperative, brings with it a pro rata share of PSC). Target species history is severable and transferable to another eligible license.

9. Gear conversions

Upon further development, the Council could include gear conversion provisions that allow Pacific cod trawl allocations to be fished with fixed gear, although any harvest would continue to be deducted from the vessels' annual trawl quota account and would not affect the fixed gear Pacific cod sector allocations.



Reducing Bycatch in Alaska



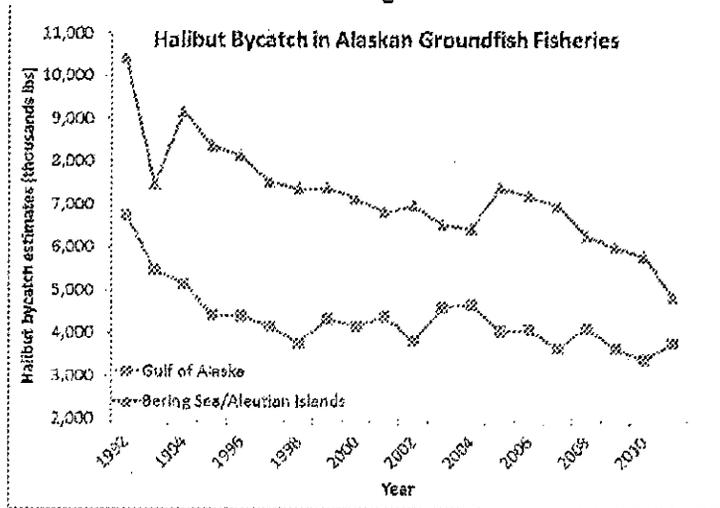
The Magnuson-Stevens Act requires the North Pacific Fishery Management Council to minimize bycatch while also allowing for optimum yield in the fisheries. The Council has implemented new measures or refined existing measures to reduce bycatch of prohibited species, such as Chinook and chum salmon, Pacific halibut, and crab in the Federal fisheries. These species are integral to the health of Alaskan marine ecosystems and to State and Federal economies. This paper shares highlights of recently implemented restrictions.

Pacific halibut bycatch reduction

Numerous subsistence users, charter vessels and commercial halibut fishermen rely on Pacific halibut. Halibut bycatch reduction is a priority for the Council and State of Alaska. Halibut size at age has decreased over the last decade and the entire Pacific halibut biomass is in decline along the Pacific coastal corridor.

Bycatch limits

- In June 2012, the Council took action to reduce halibut bycatch limits by 15% in the Gulf of Alaska (GOA) trawl fisheries and longline catcher vessel fisheries and 7% in the GOA freezer longline fisheries.
- In 2012, the Council established a halibut bycatch limit in the central GOA Rockfish Program that is 12.5% less than the historical average, and required that 45% of any unused bycatch must be left in the water and not used in other trawl fisheries that year.
- In 2008, the Council established cooperative management in the BSAI non-pollock trawl catcher processor sector and reduced halibut bycatch by about 8% over four years.



Source: IPHC 2011 (net weight).

King, tanner and snow crab bycatch reduction

Gear modifications

- In 2011, new regulations required all BS flatfish fisheries to elevate their trawl sweeps off the seafloor to reduce habitat damage and crab mortality. In 2013, this requirement was extended to all central GOA flatfish fisheries.
- Pot fishing gear is required to have biodegradable panels to prevent lost pots from 'ghost fishing' and tunnel openings or escape panels to reduce crab bycatch.



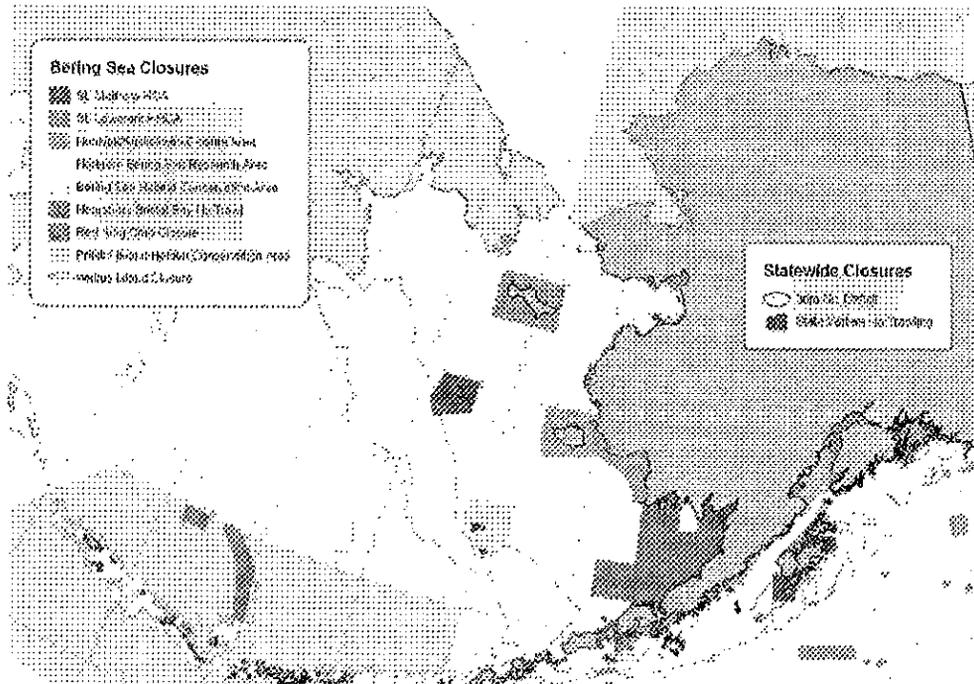
Bycatch limits

Bycatch limits are established for some red king, Tanner, and snow crab stocks by the Council in the BS groundfish fisheries and by the State in the statewide scallop fisheries. Bycatch limits are area specific to reduce impacts on local populations and fluctuate based on annual estimates of crab abundance.



Area closures

Several closures were applied in the Bering Sea in the mid-1990s to conserve red and blue king crab stocks, such as the Red King Crab Savings Area, the Nearshore Bristol Bay Closure, and the Pribilof Islands Habitat Conservation Area. In 2010, the Council adopted a bottom trawl closure in Marmot Bay to reduce bycatch of Tanner crabs, enhancing existing trawl closure areas designed to protect red king crabs.



Chinook salmon bycatch reduction

Chinook salmon are an integral part of subsistence, sport, and commercial harvests in Alaska. The Council has implemented numerous management measures to reduce Chinook salmon bycatch over the years.

Bering Sea

In 2011, the Council implemented a new Chinook salmon bycatch avoidance program for the Bering Sea pollock fishery, which includes:

- A hard cap on the number of Chinook salmon that can be taken in the Bering Sea pollock fishery. This maximum limit requires immediate closure to all further pollock fishing for the remaining season.
- Incentive plan agreements to keep bycatch lower than the cap level. These agreements include explicit incentives and penalties for the pollock fleet to avoid Chinook salmon in all conditions.
- An industry program to close areas of the pollock fishing grounds when Chinook salmon bycatch rates are high in those areas.
- Requirements for every pollock vessel to have at least one observer onboard at all times. It requires a full count of all salmon caught, with genetic sampling to determine stock of origin.

Gulf of Alaska

- In 2012, a bycatch cap of 25,000 Chinook salmon was established for the western and central GOA pollock trawl fisheries.
- In 2013, the Council approved a hard cap (7,500 salmon) on Chinook bycatch in all remaining GOA trawl fisheries.
- Full retention of Chinook salmon is also required in all trawl fisheries. Retention of salmon supports research to identify the stock of origin of Chinook salmon bycatch in the GOA.



For more information: (907)271-2809 or www.alaskafisheries.noaa.gov/npfmc