

# Public Comments

Pacific Cod | Anchorage, October 27-28, 2022

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## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 6, 2022 7:02 AM

### First Name

Alfredo

### Last Name

Abou-Eid

### Community of Residence

Chignik Lagoon, Alaska

### Write your comment here:

I, Alfredo Abou-Eid, strongly oppose proposal #9 which, if enacted, would remove vessel registration exclusivity for state-waters jig gear fisheries.

Super exclusive status is an important and appropriate tool to promote small local fishing fleets. The super exclusive Chignik jig GHL is designed to promote the jig fishery opportunity for local Chignik fishermen - not for a statewide jig fleet. And the reason that there is no active jig fishing in Chignik in recent years is that there is no local processor for the fish for our small boat jig fleet.

A more appropriate adjustment would be to move the Chignik jig quota to the Chignik pot fleet until the local conditions allow for a profitable fishery for the local Chignik jig fleet.

The regulations for Black rockfish should also remain the same.

### Proposal 9 - Oppose

Alaska Board of Fisheries  
Marit Carlson-Van Dort, Chair  
Submitted via online portal & via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Support for Proposal 161**

October 11, 2022

Dear Chair Carlson-Van Dort and Alaska Board of Fisheries Members:

The undersigned fishermen and processors participating in Alaska's Pacific cod fisheries thank you for the opportunity to comment in strong support of [Proposal 161 - Policy on Groundfish Fishery Resources Management](#).

This proposal is necessary to retain sustainability certification for Alaska's state waters Pacific cod fisheries by both the Responsible Fisheries Management (RFM) and Marine Stewardship Council (MSC) programs. **Alaska needs RFM and MSC certification to sell cod into nearly all markets in the U.S. and European Union, among others.** This proposal was put forward in response to the RFM and MSC certifications carrying a condition related to the lack of written fishery-specific management objectives for Pacific cod harvested in Alaska state waters. The Alaska Fisheries Development Foundation (AFDF) is the client for these certifications. A condition means that the certification bodies are granting the client time to address the issue before the next certification cycle. If it is not addressed, these fisheries will lose sustainability certification and access to the most valuable markets for Alaska cod.

As the client responsible for fulfilling any conditions, AFDF facilitated discussions among a steering committee that represented a broad group of Pacific cod stakeholders to draft a BOF proposal to meet the condition for the certification (submitted in April 2022). **This proposal is non-allocative, benefits all gear groups, and is supported by stakeholders as a whole. It outlines a very broad management policy for the BOF, similar to policies for other species such as crab and salmon. Proposal 161 does not change current BOF management. It only serves to document the broad goals and objectives that the BOF already uses to guide groundfish management so that Alaska can "get credit" for the management the BOF already does and satisfy this technical requirement to retain certification.**

Serious impacts would result from the Alaska cod industry losing certification. Loss of certification means lower value received for Alaska's Pacific cod harvests. It would also create confusion in the marketplace for all Alaska cod due to the continued certification of cod harvested in federal waters but not in state waters, as well as damage the overall Alaska seafood brand. There would also be significant increased handling and logistics costs because cod from state waters would need to be accounted for, processed, and marketed separately from cod harvested in federal waters. Many Alaska fishermen and processors participate in both federal and state waters cod fisheries, and our harvests collectively share an important marketplace.

Alaska Department of Fish and Game (ADF&G) supports maximizing the value from Alaska's fisheries, with one of the primary goals of the department being to optimize economic benefits from fish and wildlife resources. Cod is economically important to every gear group (jig, pot, longline, trawl) and all regions (Bering Sea, Aleutian Islands, Western Gulf of Alaska, Central Gulf, and Eastern Gulf), consistently making up 10% or more of the ex-vessel value of all species in Alaska. The state waters cod Guideline Harvest Levels (GHLs) combined exceeded 71 million pounds in 2022. However, as previously stated, with the loss of certification all cod caught off Alaska in state and federal waters would be affected; in 2021, that was more than 156 million pounds, with a first wholesale value of \$283 million.

While the conditions first placed on cod were the impetus for this proposal, it is submitted as a statewide proposal for all Alaska groundfish fisheries, to be considered at the board's March 2023 meeting. Given a similar situation for the certification of the Prince William Sound pollock fishery, the move to include all such fisheries statewide was made to proactively address any other potential certification of a groundfish fishery in state waters. Adopting this proposal will allow Alaska to continue reaping maximum economic benefit from these important fisheries.

Managing fisheries sustainably for generations is the primary responsibility of the BOF and ADF&G. But we must also be able to maintain and expand markets to sell those fish to have a successful fishery. We respectfully request that the BOF adopt Proposal 161 and establish a broad, written policy for groundfish management that aligns with the BOF's current practices. With this action, the Alaska state waters cod fishery and other groundfish fisheries will continue to meet the requirements for RFM and MSC certifications, and Alaska will get marketplace credit for the exemplary fisheries management practices already in place.

Thank you for your consideration and service.

Sincerely,

Jason Anderson, **Alaska Seafood Cooperative**  
Chris Barrows, **Pacific Seafood Processors Association**  
Julie Bonney, **Alaska Groundfish Databank**  
Julie Decker, **Alaska Fisheries Development Foundation**  
Angel Drobica, **Western Alaska Community Development Association**  
Abby Fredrick, **Silver Bay Seafoods**  
Hannah Heimbuch, **Under 60 Cod Harvesters**  
Darius Kasprzak, **Alaska Jig Association**  
Stephanie Madsen, **At-Sea Processors Association**  
Malcolm Milne, **North Pacific Fisheries Association**  
Stefanie Moreland, **Trident Seafoods**  
Chad See, **Freezer Longline Coalition**  
Rebecca Skinner, **Alaska Whitefish Trawlers Association**



October 10, 2022

Marit Carlson-Van Dort  
 Alaska Board of Fisheries Chair  
 Alaska Board of Fisheries/Game  
 P.O. Box 115526  
 Juneau, AK 99811-5526

RE: 5AAC 28.648 Dutch Harbor Subdistrict Pacific Cod Management Plan Proposal 6

Dear Chair Carlson-Van Dort,

The undersigned CDQ groups support the Dutch Harbor Subdistrict (DHS) Pacific Cod Management Plan Proposal 6 on the Alaska Board of Fisheries' (BOF) October 2022 agenda. We believe this proposal addresses and balances the impacts of the 2018 Pacific cod management decision on our groups by modifying the current Dutch Harbor Subdistrict (DHS) Pacific cod guideline harvest level (GHL) fishery schedule to one that is based on abundance.

The CDQ Program was established in 1992 by the State of Alaska to help support fisheries-based economic development in 65 Western Alaska communities. In 2020, our program directly accounted for approximately 20% of our regions' employment and labor income, 2,360 jobs, and scholarship funding for over 1,000 students. Our groups offer broad reaching programs to support small boat fisheries in state and federal waters. Over the years, these have included providing market access in very remote communities by operating shoreside processing facilities, tendering, and buying stations, as well as grants and loan programs to help with vessel, permit, and quota purchases. Each year CDQ groups also fund substantial cooperative research efforts that aid in the management of state water salmon fisheries, in collaboration with ADFG.

As outlined in the proposal, the BOF modified the DHS Pacific cod GHL from 6.4% of the Bering Sea Pacific cod federal allowable biological catch (ABC) to 8% starting in 2019, with an annual increase of one percentage point each year the GHL is achieved up to 15%. Because Pacific cod abundance is low, every pound allocated to the DHS GHL has a direct impact on CDQ federal participation, as almost 40% of every federal point is owned by an Alaska group. Additionally, while the DHS cod fishery reached its 90% harvest performance threshold this year, there is still a considerable amount of cod left in the water, and the fishery may need to be reevaluated to prevent underutilization in the future, particularly as the biomass increases.

We appreciate the importance of state water fishery opportunities to Alaskans. The CDQ program's purpose is to support fisheries' access and participation for our residents, and we have created many programs structured to do just that throughout our regions. As you evaluate this proposal, we respectfully request that the BOF consider both the Alaska state and federal interests in this Pacific cod fishery, as well as how the fishery's current design may lead to unharvested cod under certain abundance levels.

We believe Proposal 6 provides the BOF with a way to better balance fishing opportunity for Alaskans in the DHS cod fishery and Alaskan communities that depend on the offshore cod fisheries. Thank you for your thoughtful consideration of this matter and your service on the Alaska Board of Fisheries.

Sincerely,



Luke Fanning, Chief Executive Officer  
Aleutian Pribilof Island Community  
Development Association



Ragnar Alstrom, Executive Director  
Yukon Delta Fisheries Development  
Association



Eric Deakin, Chief Executive Officer  
Coastal Villages Region Fund



Robin Samuelson, Chairman  
Bristol Bay Economic Development  
Corporation

CC: Alaska Board of Fisheries Members  
Alaska Department of Fish & Game

**Board of Fisheries - Pacific Cod Meeting Comments**

Submitted Time: October 11, 2022 9:19 PM

**First Name**

Keith

**Last Name**

Bell

**Community of Residence**

Homer, Alaska

**Write your comment here:**

My name is Keith Bell, I'm a born and raised Alaskan resident from Homer. I'm writing in opposition to propositions both 5 and 6 being considered for board approval. Having worked on deck and eventually operating a 58' foot vessel in the Area O cod fishery, I saw firsthand a great opportunity not just for me but for many young fisherman to make their way into the industry if they're willing the work for it. Using money made in Area O I was able to afford to buy my own boat to use in other fisheries in Alaska. I oppose the propositions because it's not sensible to change the current regulations due to the fact that the proposed length is an arbitrary number, not correlated to anything but what benefits a select few. Thank you.

-Keith Bell

**Proposal 5** - Oppose

**Proposal 6** - Oppose

Chair Carlson-Van Dort and Members of the Board,

My name is Bernie Burkholder, and I am an Owner and Manager of the F/V Northern Endurance and F/V Aleutian Endurance. The F/V Northern Endurance is 78 ft length overall and the F/V Aleutian Endurance is 58 ft length overall. Both vessels are home ported and based out of Kodiak. These vessels have traditionally supported local Kodiak businesses. The captains and crews largely reside in Alaska. The Northern Endurance began fishing in the Central Gulf of Alaska State Water Pacific Cod pot fishery in 2014 and the State Water Pacific Cod Fisheries in Adak in 2018. We have fished Pacific Cod with pots consecutively since 2014 and prior to that date with longline gear. Pacific Cod pot fishing is a better and cleaner fishery with significantly less wastage and provides the fishermen the ability to deliver a higher quality product.

I oppose Proposal 2, 5 and 6.

### Proposal 2

First, I believe in the Alaska State Water Pacific Cod Fisheries and support the foundation of the social and economic benefits this fishery has brought to Alaska Communities.

Three years ago, the Board of Fish heard discussions to exclude traditional Alaska State Water Pacific Cod pot vessels above 58 ft from the Adak fishery. It was decided by the Board of Fish at that meeting to include all vessels 100 ft and under in this fishery without limitations.

Proposal 2 asks for vessels with lengths of 59 ft to 100 ft be limited to 25 percent of the GHL. This group of vessels have historically caught well over 50 percent of the GHL. The net effect of this proposal would be to limit traditional fishing vessels in Adak that are over 59 ft in length so other vessels under 59 ft who have first completed fishing in another area can then come to Adak for another fishing opportunity. I do not see this as being fair to historic participants.

Proposal 2 would reallocate quota from a historic fishermen and vessels 59 ft and over who have fished consecutive years and supported local processing and the business community to a new user group. The vessels and fishermen who remained after the bankruptcy of the shore-based processor Golden Harvest all sustained large economic losses. The vessels that remained built a new and viable Alaska State Water Pot Cod Fishery by at first chartering and paying for tenders back to Dutch Harbor and Akutan. Over time and with a lot of coordinated effort and gains in efficiency, the tenders are now paid for by the processors. It remains to be seen if a new shore-based processor will emerge in the Adak market, but the Alaska State Water Pacific Cod Fishery is stronger and more viable now than it has been in the last three years.

Proposal 2 would benefit a select group of vessels and fishermen who have had the opportunity to fish Pacific Cod with pots in other Alaska State Water Pacific Cod Fisheries at the expense of traditional fishing vessels and fishermen in the Adak fishery. This proposal would in effect cripple the gains made by vessels 59 ft and over - and under 59 ft - who have worked together and consecutively fished every year from the beginning of the season to the seasons end.

All successful business models need stability, and the Alaska State Water Pacific Cod Fishery in Adak is no exception.

#### Proposal 5

As stated above, I believe in the Alaska State Water Pacific Cod Fisheries and support the foundation of the social and economic benefits this fishery has brought to Alaska Communities.

Proposal 5 would reallocate quota from a historic user group who have supported the foundations of the Alaska State Water Pacific Cod pot fishery to a very small subset of the fishery that would not provide any significant new benefit to the fishery. Since 2015, only 1 vessel participating in the fishery would qualify for this newly defined sector. For this reason, I see Proposal 5 as an unfair reallocation. The historic user group has followed the rules, made significant investments, supported local businesses, financed with Alaskan banks, and fished with a very low incidental bycatch. Establishing a new user group now, without the historic catches to support a reallocation, would not be fair or beneficial.

In addition, the processing sector would not benefit from this change. Consistent steady supply of high-quality product is needed for any processor to be viable. Putting additional focus on smaller vessels in the middle of winter in the Dutch Harbor Subdistrict would not be a step in the right direction for consistent processor supply. I believe Proposal 5 would reduce both processing stability and viability.

I oppose additional vessel length restrictions that would reallocate traditional Pacific Cod catches. Beginning a new category of 55 ft and under vessels, in the Dutch Harbor Subdistrict, would effectually permit a new exclusive fishery with little or no catch history.

In my opinion, there has been a misplaced effort in allocating and then trying to reallocate Alaska State Water Pacific Cod to smaller catcher vessels. Long time Alaska fishermen have made long term investments in Alaska State Water fisheries only to see the rules changed to benefit a new prospective group of vessels without catch history to support their new fishery. The damage to the historic Alaska State Water Pacific Cod vessels and fishermen is not offset with any reasonable gain by the new vessels and fishermen without historic participation support their requests.

#### Proposal 6

I am opposed to Proposal 6 because I feel it seeks to redesign the state water allocation to a tiered system approach. In addition, I believe the state water allocation should not be given a lower priority than the federal allocation neither in times of low or high abundance. Both the federal and state water allocations are important for Alaska and Alaskan Communities.

Bernie Burkholder  
bernie@efishco.com

**Board of Fisheries - Pacific Cod Meeting Comments**

Submitted Time: September 27, 2022 10:12 AM

**First Name**

James

**Last Name**

Burton

**Community of Residence**

Anchorage, AK

**Write your comment here:**

Madam Chair and members of the board,

I oppose proposals 2.

Proposal 2 seeks to limit access to only pot / jig gear when this fishery has historically ALSO been fished by the < 60 Trawl fleet. This would impact me personally as I plan to participate in the AI state waters under 60 trawl fishery starting in 2023.

However, I do support the pot limit component of this proposal to level the playing field for the pot boats engaged in the fishery. It does seem out of line with other State pot cod fisheries to not have a pot limit.

Please reject the proposal and feel free to contact me. I planned to attend the meeting but schedule conflicts prevent it. If telephonic testimony is allowed for this meeting, I plan to participate telephonically.

Thank you

James Burton

**Proposal 2 - Oppose**

Abby Duffy  
October 11, 2022

My name is Abby Duffy, I am an Alaska resident, living in Talkeetna, AK. I am the deckboss on the F/V Miss Leona, a former research biologist and a former Alaskan fisheries observer. I am writing on the behalf of the F/V Miss Leona. I adamantly oppose Proposal 2. Adoption of this proposal would likely cause harm to the community of Adak, by stranding fish.

As of now for the 2022 season, The AI cod fishery is still open, with a likely result of fish being stranded in the water. Proposal 2 seeks to exclude the small number of trawlers that have historically participated in this fishery. Excluding historic participants from the fishery will likely lead to even more stranded fish in the future.

Trawl vessels under 100' have participated in this fishery since it began in 2006 (in 2006 the fishery had 1 pot boat). The fishery was developed at this time to include trawl vessels (even though the Kodiak fishery was developed in 1997 as pot and jig only). Trawl vessels have supported the multiple shoreside plants that have been in Adak. The Miss Leona has delivered shoreside in Adak whenever a cannery has existed (we are the only ice boat and cannot deliver offshore).

Beyond the major problem of harm to the AI communities, Kavanaugh's rationale for implementing Proposal 2 is to streamline management plans of all Statewaters fisheries. This rationale is fundamentally flawed because the AI fishery is different from the other Statewater cod fisheries. The cod are genetically different from those in the Bering Sea and Gulf of Alaska. The currents are different, the weather patterns are different, the passes are different. The needs of the communities are different. The AI is also different in that there are no marine support services, making the risk management of a fishing plan out there different from the other fisheries. When the AI fishery was developed in 2006 differences in its management plan reflected the differences in the fishery.

Given that the AI fishery is different than the other Statewaters fisheries, there is no reason it ought to have its management plan aligned with those other fisheries. Especially when alignment of those plans would lead to suboptimal management by stranding fish in the water with likely detrimental effects on the community of Adak.

Abby Duffy

Proposal 2 - Oppose  
Proposal 3 - Support  
Proposal 4 - Support

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 10:49 PM

### First Name

Robert

### Last Name

Gunderson

### Community of Residence

Kodiak, Alaska

### Write your comment here:

Proposal 5 and 6

Chair Carlson- Van Dort and members of the Board,

I am a 62 year resident of Kodiak. I grew up in a fishing family with my father starting his fishing career in 1938. I graduated from Kodiak High School in 1974 and started running my own boat in 1977. Since then my wife and I have built our fishing business up to the 58 foot seiner that we have now. I also served on the NPFMC Advisory Panel for 3 years, from February 2006 to December 2008.

I am writing to you today as a participant in Alaska's state water pot cod fisheries. I appreciate the opportunity to comment on the proposals for changes to the Area O State Water Pot Cod Season. These proposed changes would negatively affect my business, my community and the community of Dutch Harbor, my crewmembers and their families. The Area O State Water Fishery, that the board set up, is working very well. It employs 25 to 35 of the less than 60 foot boats right now, and their crews, with room for more boats to join if they choose. It also takes pressure off the other State Water Pot Cod fisheries such as the Area M fishery.

My wife and I Oppose Proposal 6. It is proposed as a conservation move, yet there are no other conservation proposals for any other gear types, Factory Longline, CDQ Groups, or anyone, anywhere including anything before the NPFMC. To us, this seems to be a fish grab by big businesses from small guys. What would come from our State Water Quota wouldn't be conserved, but would go into increasing the quotas of the federal water players at the expense of the small family owned boats that you created this fishery for. The way that the fishery is set up, and based off the Federal TAC, if the TAC goes down, then the State Water Quota goes down, just like every other State Water Code Fishery does. If the TAC goes up, the the State Water Quota goes up, but with Proposal 6 they want to cap the quota so that our Area O quota can't increase, only decrease. That doesn't seem right. It seems to be saying that the big businesses that are fishing the Federal Quotas are more important than the Alaskan, family owned small boats that this Area O State Water fishery was created for. The small boats that

are fishing inside of 3 miles for the cod quota are doing this with very low bycatch, and bycatch is on everyone's minds these days.

My wife and I also Oppose Proposal 5. If we start subdividing the State 3 mile area into subcategories, where does that stop. This is a proposal for a 55 foot length, but what would be next, a 40 or 50 foot length in another area or how about an 18 or 22 foot wide area. Once this door is opened it will never stop. Bristol Bay has a 32 foot limit with different types and sizes of 32 foot boats that compete together. There aren't propeller only or jet drive only areas or big 32 foot and small 32 foot areas.

In summary, my wife and I do not think that either of these proposals are necessary, the right direction for the Area O State Water fishery, or the State of Alaska.

Thank you for reading our comments.

Robert and Jennifer Gunderson

F/V Icy Mist

3614 Spruce Cape Road

Kodiak, Alaska 99615

907-539-5698

bjmist@gci.net

**Proposal 5** - Oppose

**Proposal 6** - Oppose

Chair Carlson-Van Dort and Members of the Board,

I am writing to you today as a participant in Alaska's state water cod fisheries. I appreciate changes would affect my business, my family and my community. I think Area O fishery management is working well now, and changes to participant access or the GHM system are not in the best interests of the fishery or Alaska. **I oppose Proposals 5 and 6.**

We own and operate the F/V Cynosure and F/V Cerulean, both 58' and known as Super "8"s. Vessels were built based on the experience and insights of a skipper with 20+ years of experience in the Bering Sea on a variety of platforms. Our ownership group helped pioneer the development of wide 58' vessels focusing on safety and flexibility. Our vessels often work 9-10/months a year. Both vessels are home ported in Dutch Harbor and fish solely in the Bering Sea and Aleutians. Our primary profit center in recent years has been pot fishing Pacific cod and is supplemented with longlining of sablefish and halibut and tendering. Our operation spends hundreds of thousands annually with local Dutch Harbor vendors provisioning and repairing our vessels. We employ a minimum of 5 crew/vessel and frequently have 7 crew per vessel. Preference is given to qualified Alaskans for crew positions. We have studied how cod pots fish and taken steps to minimize bycatch with pot design.

Proposal 6 suggests that you redesign the statewater allocation on a tiered system, a proposal I strongly disagree with. All cod harvesting sectors have an allocation percentage based on abundance. If we reduce the statewater allocation percentage at times of lower abundance, to try to ensure a certain threshold for federal sectors, we are saying the statewater fishery is a lower priority, or somehow more resilient than the federal sectors. That's not right. It also suggests that the state has a responsibility to balance the federal sector first, before dispersing fish to its own statewater participants. That's not right and sets a dangerous precedent for putting statewater harvests second. While there are Alaskans participating in the federal fisheries and those are important businesses to our communities too, this issue has moved beyond allocation discussions. The State of Alaska should manage the fishery resources in statewaters, unconditionally, not just at times when there's lots of fish in the water.

Pacific Cod has been the main profit center for our operation for the last 5 years. The cut of 1% would be dramatic for the under 60 group given there were 29 vessels fishing the state water fishery in 2022. Reducing 1% translates to a decrease of 10% for the average operation while this would have nominal benefit spread over the rest of the sectors. Note that this also changes the cap to 13% instead of the 15% in current structure of step increases. We are supportive of CDQ groups but believe this is an assault on small fishing operations which are based in local Alaskan communities and just as deserving of state resources. We work with the CDQ groups harvesting halibut quota and this measure would reduce our financial viability and ability to support harvest of halibut. The real intent behind this proposal is to stop the 1% step increase to 15% which would largely benefit not CDQ groups but large corporate fishing interests in the Bering Sea and Aleutians. I would urge BOF and NMFS to study the true economic impact of this proposal to small operations as ours.

Proposal 5 would limit a portion of the fishery to boats 55 and less. The boats in this fishery, while all under 60 feet, come in a wide variety of sizes and capacities, and vessel length is only one factor. In a winter fishery in the Bering Sea, a less than 60 foot boat is small boat. While we've seen some participants build or buy larger platforms to be safe and effective fishermen, this statewater fishery has and continues to be a meaningful opportunity for all of the under 60 vessels. We've seen many young fishermen work their way from crew to skipper to investing in a boat, and on all sizes of boats within the fishery. It's a healthy fishery and fishing opportunity, and there is no need to constrain a portion of the fleet into a smaller fishery area.

This proposal is unnecessary and adds one more allocation for those administering the fishery to deal with. Our vessels spend limited time fishing this area and since we are capable of fishing in areas further away, we do. Our companies have not only invested in, but pioneered larger platforms, for efficiency and SAFETY. Such investments should be supported and not penalized as this proposal would do. In the current season, ALL the larger platforms (known as super 8s) stopped fishing at the end of April. Despite good summer weather, no other boats to contend with, the under 55' vessels have not taken advantage of harvesting the remaining state pacific cod quota available. On April 29 2,537,056 lbs remained of GHL. On October 5 a notice was issued by the state cod managers that 1,700,000lbs of GHL remained and encouraged participants to continue fishing and removed pot limits and requirements for pot tags. Note that on this date, boats petitioning for this proposal WERE TIED TO THE DOCK IN GOOD WEATHER. The under 55' vessels have had FIVE months to harvest available quota and have not taken advantage of the opportunity. This proposal adds unnecessary complexity to the under 60' vessels, would benefit only 1-2 vessels and risks stranding pacific cod.

This is an important and impactful fishing opportunity for Alaskan vessels, and the many communities across the state they homeport in. I do not think these proposed changes are necessary, or a positive direction for the fishery or the State of Alaska. Thank you for considering my comments.

Sincerely,  
Jerri Harden, Manager  
Neil Anderson, Owner  
Joshua Trosvig, Owner and Skipper  
HAT LLC – F/V Cynosure  
Far West Fisheries – F/V Cerulean

Chair Carlson-Van Dort and Members of the Board,

I am writing to you today as a participant in Alaska's state water cod fisheries. I appreciate this opportunity to comment on the proposal for changes to the Area O fishery. Those changes would affect my business, and my community. I think Area O fishery management is working well now, and changes to participant access or the GHJ system are not in the best interests of the fishery or Alaska.

I oppose Proposals 5 and 6

I am a long-time resident of Homer and own and operate a 58 ft pot boat and I have fished state water cod in Cook Inlet, Kodiak, Chignik, Area O and the Aleutian Islands and Adak over many years. Our state water fisheries give us many opportunities and doing so we support a wide range of communities and their support businesses. The Area O fishery is a very important fishery for my family and my 4 crew members, and their families, and it is something that we have become very dependent on.

Proposal 6 suggests that you redesign the state water allocation on a tiered system, a proposal I strongly disagree with. All cod harvesting sectors have an allocation percentage at times of lower abundance. To try to ensure a certain threshold for federal sectors, we are saying the state water fishery is a lower priority, or somehow more resilient than the federal sectors. That is not right! It also suggests that the state has a responsibility to balance the federal sector first, before dispersing fish to its own state water participants. That sets a dangerous precedent for putting state water harvest second. While there are Alaskans participating in the federal fisheries and those are important businesses to our communities too, this issue has moved beyond allocation discussions. The State of Alaska should manage the fishery resources in state waters, unconditionally, not just when there's lots of fish in the water. We are harvesting this cod with much lower habitat and bycatch impacts than any federal sector, with the exception of the other pot sectors. I feel this proposal is taking fish away from the state and giving it right to the federal trawl sector.

Proposal 5 would limit a portion of the fishery to boats 55 and less. The boats in this fishery, while all under 60 feet, come in a wide variety of sizes and capacities,

and vessel length is only one factor. In a winter fishery in the Bering Sea, a less than 60-foot boat is a small boat. While we have seen some participants like myself build or buy larger platforms to be safe and effective fishermen, this state water fishery has and continues to be a meaningful opportunity for all the under 60 vessels. We have seen many fishermen work their way from crew to skipper to skipper to investing in a boat, and on all sizes of boats within the fishery. It is a healthy fishery and fishing opportunity, and there is no need to constrain a portion of the fleet into a smaller fishery.

The Board of Fish has grappled with this in the past for example, with proposals in the Chignik state water fishery over length, tonnage, to no avail. It cannot be done this way. In this action before us it would only be a matter of time before a 55 ft by 28 ft wide vessel slid out of a ship yard. Then what? A new proposal would be in front of you at some point to restrict width. I used to own and operate a boat that would be considered small in today's terms, and traveled to many different state water fisheries and fished them successfully. Was I the top boat? No! But I did well and accepted where I stood in that fishery with the vessel I had. This is the very foundation of our state water fisheries, it is giving us opportunity to fish and be successful no matter what length and size we are. Many of our boats in this fishery have been modified or built to the latest and improved engineering and design of today, as with all the other fisheries in the state of Alaska and the west coast. Bristol Bay is a prime example of what can be developed and they have a length limit of 32 feet. This proposal is counterintuitive of this modernization for safety and efficiency in harvesting fish today.

This is an important and impactful fishing opportunity for Alaskan vessels, and the many communities across the state they homeport in. I do not think these proposed changes are necessary, or a positive direction for the fishery or the State of Alaska. Thank you for considering my comments.

Todd Hoppe

907-299-2045

hoppeent@gmail.com

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 6:53 PM

### First Name

Ryan

### Last Name

Johnson

### Community of Residence

Haines, Alaska

### Write your comment here:

Chair Carlson-Van Dort and Members of the Board,

I am writing to you today as a participant in Alaska's state water cod fisheries. I appreciate this opportunity to comment on the proposals for changes to the Area O fishery. Those changes would affect my business, my family and my community. I think Area O fishery management is working well now, and changes to participant access or the GHM system are not in the best interests of the fishery or Alaska. I oppose Proposals 5 and 6.

I am the owner/ operator of the 58 foot F/V Devotion. I have participated in the Area O fishery for the past three seasons and have owned the Devotion for three years now. Purchasing the Devotion was a huge step for me and the culmination of year round fishing in Alaskan waters for the past 29 years. My business plan is dependent on a vibrant winter cod season. I employ three young Alaskan deckhands, all of whom participate in multiple fisheries and various salmon permits and longline quota. Their winter crew shares are also of vital importance to their livelihoods and contributions to several coastal Alaskan communities.

Proposal 6 suggests that you redesign the statewater allocation on a tiered system, a proposal I strongly disagree with. All cod harvesting sectors have an allocation percentage based on abundance. If we reduce the statewater allocation percentage at times of lower abundance, to try to ensure a certain threshold for federal sectors, we are saying the statewater fishery is a lower priority, or somehow more resilient than the federal sectors. That's not right. It also suggests that the state has a responsibility to balance the federal sector first, before dispersing fish to its own statewater participants. That's not right and sets a dangerous precedent for putting statewater harvests second. While there are Alaskans participating in the federal fisheries and those are important businesses to our communities too, this issue has moved beyond allocation discussions. The State of Alaska should manage the fishery resources in

statewaters, unconditionally, not just at times when there's lots of fish in the water.

Proposal 5 would limit a portion of the fishery to boats 55 and less. The boats in this fishery, while all under 60 feet, come in a wide variety of sizes and capacities, and vessel length is only one factor. In a winter fishery in the Bering Sea, a less than 60 foot boat is small boat. While we've seen some participants build or buy larger platforms to be safe and effective fishermen, this statewater fishery has and continues to be a meaningful opportunity for all of the under 60 vessels. We've seen many young fishermen work their way from crew to skipper to investing in a boat, and on all sizes of boats within the fishery. It's a healthy fishery and fishing opportunity, and there is no need to constrain a portion of the fleet into a smaller fishery area.

I can relate to the desire of small boats to ensure opportunity as my first vessel was a 38 foot jigger out of Kodiak. However, ample opportunity exists all around the Gulf for smaller vessels to participate in both jig and pot fisheries safely. The Bering Sea is occasionally safe for vessels of this size but it is not the norm.

This is an important and impactful fishing opportunity for Alaskan vessels, and the many communities across the state they homeport in. I do not think these proposed changes are necessary, or a positive direction for the fishery or the State of Alaska. Thank you for considering my comments.

Sincerely,  
Ryan Johnson  
F/V Devotion

**Proposal 5 - Oppose**

**Proposal 6 - Oppose**

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 4:49 PM

**First Name**

Garrett

**Last Name**

Kavanaugh

**Community of Residence**

Kodiak

**Write your comment here:**

Support 2; oppose 3,4,5,6

**Proposal 1 -**

**Proposal 2 -** Support

**Proposal 3 -** Oppose

**Proposal 4 -** Oppose

**Proposal 5 -** Oppose

**Proposal 6 -** Oppose

**Proposal 7 -**

**Proposal 8 -**

**Proposal 9 -**

**Proposal 10 -**

**Proposal 161 -** Support With Amendments

Proposal 2 We support the frame work of this proposal and with intent that more detailed language will be provided at the Oct meeting by stakeholders.

#### Proposal 3 & 4

We are opposed to an earlier start date for trawl gear vessels over 60 in the Aleutian Islands Sub District. This trigger is set at March 15<sup>th</sup> to allow the State Waters vessels under 60 ft time to harvest quota in an orderly manner. The current March 15<sup>th</sup> trigger already has the effect of pressuring the under 60 fleet to increase their harvest rate and make safety concessions to ensure a successful season. As soon as the over 60 trawl vessels enter the GHL fishery it has an immediate overall effect of closing the fishery in days. We look forward to a discussion within proposal #2. We cannot support this proposal in isolation and find it to reduce safety, create barriers to participation for smaller vessels, and destabilize small boat participation.

#### Proposal 5

We find this proposal to be detrimental to the flexibility and viability of the majority of vessels in the Dutch Harbor State Waters GHL fishery. Table 12 illustrates that this proposal would benefit a nine-year average of 1.1 current participants or LESS than 2 vessels and adversely impact 26.1 average participating vessels.

On table 13 it shows that the harvest in the two statistical areas have been caught predominately by vessels 56-58ft. More specifically, the average <56ft participants is 0.33 and 56-58ft vessels is 2.89.

We should consider that there are vessels 56-58 that choose- for the same reasons as a <56ft vessel, to fish in the areas targeted by this proposal; That their safety and access is as important as any other; And while the number of vessels 56 to 58ft have increased overall, the effort in this area has not (reference table 12). It is not good policy to push vessels that have made operational decisions to enhance their safety out of this area.

Another consideration is the fleet's ability to react to the urgent request from the Bering Sea Crabber's Association to take voluntary measures that avoid interactions with BS king crab. The fleet needs to have the ability to move if they are going to continue to participate. It is an important tool while we wait and hope that solutions are identified and implemented. Therefore, the full fleet needs access to the entire fishing grounds to fish in a safe, adaptive, and productive manner.

#### Proposal 6

This proposal seeks to put additional stress and burden on state waters harvesters in times of low abundance. It compounds the reduction of state waters GHL when there are LESS fish for everyone.

First, I want to speak to Table 15. This table implies that there would be an overall benefit and increase to the GHL. But this table does not reflect what would happen in multiple years of low abundance. We

are facing ecosystem uncertainty and to position the state fishery to bear the brunt of burden is unreasonable.

The Board of Fish created and preserved an opportunity for State participation in the BSAI in 2013. The initial percentage of ABC was modest and conservative due to statements that the state harvesters wouldn't be able to execute or harvest the GHL. The fleet proved to be more than capable and two years later, the Board of Fish saw wisdom in providing more adequate opportunity. Additionally, in a cautionary manner, the Board of Fish implemented the GHL increases over time and required that the fleet successfully demonstrate harvesting band width. Not only has this fleet been successful, the fishery has also provided a necessary opportunity over time to distribute a fleet across coastal Alaska. When the Gulf of Alaska saw a Pacific Cod Stock crash, the Bering Sea GHL provided relief for vessels that lacked permits and/or access to other state & federal fishing resources. Widespread state management throughout waters managed by Alaska is crucial to the continued success of the harvesters that depend on them. The burden of conservation would be unbalanced by this proposal. It seeks to put disproportionate hardship on state fishers. It is the opposite of shared responsibility.

We hope that this Board of Fish understands and recognizes that the creation and support of the BS State Waters fishery was timely and important. It allowed Alaska to manage a portion of fish within its 3 mile zone, defined intent and purpose to do so in the face of federal fisheries that were seeking rationalization, and has been successful in implementation and execution.

While you may hear that the share of GHL is too large, I would direct the Board to the other GHL areas that have 20 and 25% of the ABC. It is not too large and pales in percentage comparison with its companion fisheries.

Ron & Julie Kavanaugh

Kodiak Alaska

Proposal 1 - Support

Proposal 2 - Support

Proposal 3 - Oppose

Proposal 4 - Oppose

Proposal 5 - Oppose

Proposal 6 - Oppose

Proposal 7 - Support

Proposal 8 - Support

Proposal 9 - Support With Amendments

Proposal 10 - Support

Proposal 161 - Support With Amendments

**Board of Fisheries - Pacific Cod Meeting Comments**

Submitted Time: October 11, 2022 2:06 PM

**First Name**

Ethan

**Last Name**

Kizzia

**Community of Residence**

Homer, AK

**Write your comment here:**

I am commenting to oppose proposals 5 and 6. This winter (2023) will be my fifth year working as a deckhand in area O on a 58 foot boat. I am a life long Alaska resident and my work in the fishery has provided me the opportunity to advance my career. I used to my crew shares to invest in my own salmon fishing operation. The cost of starting an operation these days is very high, and I would never have been able to do without my work in area O. I want other young Alaskans to continue to have the same opportunities I did and therefore I oppose proposals 5 and 6.

**Proposal 5 - Oppose****Proposal 6 - Oppose**

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 6:08 PM

### First Name

Buck

### Last Name

Laukitis

### Community of Residence

Homer, Alaska

### Write your comment here:

Oppose Proposal 6.

I respect both the jurisdiction of the State of Alaska's Board of Fisheries and the Federal NPFMC's jurisdiction. The Board is not the proper jurisdiction to increase the share of cod for CDQ groups. The CDQ program was created by the federal system. The NPFMC could increase the CDQ share (as it has done by amendments incrementally in the past) and derive un-diluted benefits to Alaskan CDQ communities. If the Board re-allocates cod to the federal jurisdiction you will delegate your authority to manage the state's resources. This re-allocation will result in increased halibut, crab, and salmon bycatch and less fish being delivered to our coastal communities. Article 8 of the State Constitution provides for the utilization, development and conservation of all natural resources belonging to the state for the maximum benefit of its people. The cod resource is in state waters. Please continue to manage it.

My name is Buck Laukitis. My family owns two boats that participate in the Area O pot cod fishery. We have participated since the inception of the state water cod fisheries. In 1996 I helped establish what did not exist previously — a cod allocation with a clean gear type, pot limit, and opening dates, that ADFG could easily manage. The Gulf of Alaska cod GHL fisheries eventually stepped up to 25-30% of the allowable biological catch.

I also helped establish and grow the Area O allocation at each Board meeting since the original 2% allocation. The Board in 2018 established a credible allocation schedule for growth — capping the Area O allocation at 15% in 1% annual increments IF/WHEN the fleet developed to catch its allocation.

These state cod fisheries have been overwhelmingly successful. CFEC data shows over 80% of the less than 60 pot cod vessels and permit holders are Alaskan. Inversely CFEC data shows that

greater than 60' trawlers are more than 80% NON- residents.

Salmon, Halibut and Sablefish, and Cod are the three most important fisheries by value and participation for state residents.

Cod allocations to state GHL fisheries come off the top of the NPFMC's process. Next year 12% of whatever the biological decision is will go to the state GHL. After that the CDQ groups in entirety will get a 10% allocation off the top of the new whole. Then every other sector's allocation is determined. For example <60' pot 2%, catcher trawl vessels 22.1%, 13.4 % to A80 trawl processors, etc. (Table 17 of ADFG comments)

What proposal 6 conveniently leaves out is that the CDQ groups would only directly get 10% of whatever the Board re-allocates. So if you were to reduce the Area O allocation by a million pounds six CDQ groups in the simplest terms would split 100,000 pro rated 16,666 pounds each. But we know that CDQ groups also own A80 trawlers, AFA pollock trawlers, catcher trawlers, off-shore catcher processor longliners, and even <60 pot boats that fish in Area O. These direct investments increase the benefit of any re-allocation to all the federal participants as well as the CDQ interests. But these benefits for the state are greatly diluted. And the Board must consider this.

The CDQ program and GHL fisheries are alike in some respects. They are both very important to Alaskan residents, and they both grew incrementally out of frustration with the federal system which was disadvantaging Alaskans.

The CDQ has the potential to do a lot of good for their residents, but proposal 6 is the wrong approach. The right jurisdiction is the NPFMC. Proposal 6 pits Alaskans vs. Alaskans in an allocation fight we don't deserve.

**Proposal 5 - Oppose**

**Proposal 6 - Oppose**

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 12:11 PM

**First Name** - Shelly

**Last Name** - Laukitis

**Community of Residence** - Homer, Alaska

### Write your comment here:

My husband and I have a family owned fishing business. Our daughters and their husbands all work aboard, operate and are part owners of two 58 foot vessels. We have participated in state water cod fisheries in the Gulf since their inception in 1996 starting on a 42 foot boat, later in the Aleutians/Adak, and since the beginning in Area O. We have grown our business as the fishery grew.

Area O is a proving ground and incubator for young fishermen's careers. I do the book keeping for our business. We hire on average over 30 crewmen. The majority are Alaskan residents. This is a very challenging winter fishery. But it is good paying, and it is a good compliment to summer salmon fisheries. Our kids have worked from the back deck on smaller vessels to larger safer 58 foot vessels to being in the wheel house running successful operations.

We have proudly helped numerous other young fishermen take positive steps in their fishing careers and in life in general. We see young fishermen using Area O crew shares for their start up capital to purchase their own gillnetters in Bristol Bay and PWS. They have purchased houses in Sitka, Homer and Anchorage and Dutch Harbor. They keep coming back to crew to improve their equipment and to improve their lives. They will be the next generation that thrives in Alaska.

Everyone knows about the graying of the fleet and worthy efforts such as the Young Fisherman's Summit to provide business training for young fishermen. The state water cod fisheries recently might only last a few days in the Gulf of Alaska. Adak hasn't had a processor. Area O is the only thing we can count on. Many young crewmen are getting their chance to work hard the get ahead in this fishery.

Please take no action on Proposal 6.

**Proposal 5** - Oppose

**Proposal 6** - Oppose

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 10, 2022 1:26 PM

### First Name

David

### Last Name

Morey

### Community of Residence

Homer, Alaska

### Write your comment here:

Board of Fish members,

My name is David Morey. I am the captain of the Oracle which is one of the yearly participants in the DHS State Cod Fishery. I have been involved in the 58 foot fisheries since 2007. I am writing in opposition to Proposal 6. The DHS State Fishery has been instrumental in providing opportunity for small boat access in winter months for many coastal communities. The majority of owners, captains and crews are Alaska residents. For many crew this has been a catalyst into buying into salmon permits or halibut/sablefish IFQ or even ownership of the vessel they operate. Participation in this fishery has grown heavily as the cod quotas in the GOA have collapsed since 2018 and the small boat fleets of Kodak, Sand Point and King Cove lost winter fishing opportunity. This is a tough fishery with heavy weather and big expenses but has enabled these boats that would rather fish closer to home cash flow and survival. The yearly increase in DHS provided by the BOF is crucial to the fishery fluctuations in participation along with reductions in Federal quota for U60 boats. Proposal 6 is basically asking for a reduction in State GHL to accommodate the fluctuations in BS biomass related through ABC (acceptable biological catch) from CDQ groups very conveniently not adding the title of owners of the majority of CP long liners and several trawl vessels which would directly gain from a transfer of fish from State control to Federal. These vessels have mainly non Alaskan crew and hold a huge majority of the Federal Cod quota. Why would the State of Alaska give control of cod quota ( or any quota) back to Federal interests? Proposal 6 is basically only asking for one thing, a 44 million pound cap. The GHL is derived from the fluctuations in biomass as is the TAC for all other sectors of the BS. Why are they asking us to have a cap and they not? This fishery is managed successfully and I ask that you leave current percentages and increases alone. Thank you for your time and consideration.

**Proposal 5 - Oppose**

**Proposal 6 - Oppose**

**Board of Fisheries - Pacific Cod Meeting Comments**

Submitted Time: October 8, 2022 7:17 AM

**First Name**

Timothy

**Last Name**

Murphy

**Community of Residence**

Anchorage, Alaska

**Write your comment here:**

Members of the State of Alaska Board of Fisheries;

I write to comment on proposal 9 which seeks to eliminate exclusivity designations on state waters jig fisheries.

The proposer states the jig quota in Chignik has gone unharvested and when it goes to rollover for pot gear it is still unharvested. There is no shore based processor in Chignik, the pot fleet there harvests pacific cod and must deliver it in Sand Point or Kodiak, unless there is a tender available. This is reason number 1 the jig quota is untouched, as well as when it rolls over to pot gear.

Limitations on the amount of rockfish per week a vessel may harvest (5000 lbs), as well as cost of fuel are both prohibitive reasons why jig vessels do not target pacific cod or rockfish in the CMA.

It would appear the proposer could have sole access to the entire quota of rockfish and pacific cod jig fishery if they were to register there, but the exclusive and/or super - exclusive designations should be kept intact.

I oppose the passage of proposal 9.

Thank You,

Timothy Murphy

**Proposal 9 - Oppose**

**Board of Fisheries - Pacific Cod Meeting Comments**

Submitted Time: October 11, 2022 8:47 PM

**First Name**

Claire

**Last Name**

Neaton

**Community of Residence**

Homer, AK

**Write your comment here:**

My name is Claire Neaton. I am a lifelong Alaska resident, commercial fisherman and part owner of a vessel that participates in the Area O state water cod fishery. Please see the attached documents outlining the majority resident (85%) permit holders in the pot cod fishery versus majority out-of-state permit holders (86%) in the trawl fishery. Every pound of quota in the small-boat pot cod fishery will directly benefit Alaskan families. A transfer to the CDQ interests will only thin the benefits and likely end up out of state.

Thank you for your time, please see the attached.

**Proposal 5** - Oppose

**Proposal 6** - Oppose

Area 0 vessels:

<60' Pot

PC19

Dutch / St. Paul Island

St. Peter  
St. Paul  
Cinasure  
Cerulean  
Commitment  
Raven Bay  
Cascade

Kodiak

Ocean Bay  
Anthem  
Cindra Jean  
Alaska Dream  
Isle Dominator  
Atognak Straight  
Icy Mist  
Alaska Star  
Devotion  
Linnea

Sand Point

Courtney Noral  
Celtic  
Lady Joanne

King Cove

Cape St. Elias  
Scotch Cap  
Justin Case  
Lady Lee Dawn  
Alaskan Lady  
Miss Courtney Kim

Ketchikan

Shemga

Petersburg

Magnus Martens

Vigilant

April Lane

Adamant

Cape Reliant

Aleutian Spirit

Homer / Seward

Halcyon

Oracle

Kaia

Claire Oceana

Anduril

Deliverance

90% Alaskan

Seattle / Other

Karen Evich

Ocean Storm

Primus

Bruin

106 < 60' pot captains

85% Alaskan Residents

15% NON-ALASKAN

The Area O state water cod fishery has a higher percentage of Alaskans than any fishery in the state.

Name	Street	City	State	Zip Code	Fishery	Description	Year	ADFG
ABOUEID, ALFREDO S.	BOX 26	CHIGNIK LAGOON	AK	99565	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022	2022	61324
ABOUEID, RAME	5 AIRWAYS RD	CHIGNIK LAGOON	AK	99565	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		61324
ANDERSON, AARON	BOX 43	CHIGNIK LAGOON	AK	99565	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77241
ARSENAULT, RANDY	BOX 4104	HOMER	AK	99603	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		36232
BASARGIN, FILARET	BOX 821	HOMER	AK	99603	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77217
BLONDIN, BRIAN	BOX 1521	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		57986
BLONDIN, JASON	1415 BARANOF ST	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		39146
BRIGHT, TOBIAS N.	C/O WRIGHT BKPG 210 CENTRAL AVE	SEDR0 WOOLLEY	WA	98284	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		40128
BUMPUS, PETER E.	BOX 167	CHIGNIK LAGOON	AK	99565	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		59651
CARLSON, NICK A.	3281 WILEY POST LOOP	ANCHORAGE	AK	99517	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		42069
CARPENTER, ERIC W.	5432 E NORTHERN LIGHTS BLVD #866	ANCHORAGE	AK	99508	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		69625
CHRISTENSEN, ROBERT	7761 JAGUAR CIR	ANCHORAGE	AK	99502	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76769
COOK, JODY R.	2115 NW 12TH ST	BATTLE GROUND	WA	98604	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		65119
COSTELLO, FRANCIS R.	BOX 108	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		52881
COTTEN, SAM T.	BOX 6432	HALIBUT COVE	AK	99603	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		23800
CUMBERLIDGE, DANNY	BOX 93	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		42079
DAVIS, PATRICK C.	BOC 1986	SITKA	AK	99835	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76935
DAVIS, ROBERT	BOX 2240	DEAR PARK	WA	99006	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76034
DEGROEN, JOHN	9810 SW 148TH ST	VASHON	WA	98070	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		61518
DICKERSON, DUSTAN	BOX 921408	DUTCH HARBOR	AK	99692	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		47511
DIIORE, NATHAN A.	BOX 2532	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		79091
EUBANK, DONALD E.	BOX 272	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		40130
FEHST, RICKY	BOX 920911	DUTCH HARBOR	AK	99692	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77934
FERRIS, MIKE	BOX 331	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76787
FOSTER, BRUCE JR.	BOX 46	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		40130
FOSTER, DWAIN A. JR.	BOX 253	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		33100
FOSTER, DWAIN A. SR.	BOX 162	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		21312
FOSTER, JACK III	BOX 315	SAND POINT	AK	99661	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		33046
FOSTER, JACK R. JR.	BOX 254	SAND POINT	AK	99661	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		33046
GALLIGAN, MICHAEL H.	BOX 1926	FRIDAY HARBOR	WA	98250	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		46701
GALOVIN, STEVEN W. SR.	BOX 215	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		61119
GARDNER, JOHN P. III	BOX 95	SAND POINT	AK	99661	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		10495
GIBSON, TROY	1447 OAK LEAF DR	COLUMBIA	TN	38401	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		47952
GOULD, ARCHIE	BOX 334	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		61304
GOULD, DEAN	124 RAMS LN	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		47647
GOULD, ROBERT L.	BOX 307	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		61304
GOULD, STEVEN D.	BOX 375	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		53446
HANSON, ROBERT J.	3705 ARCTIC BLVD PMB 2086	ANCHORAGE	AK	99503	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78919
HARPER, IAN C.	214 E REZANOF APT B	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		57986
HENLEY, WADE A.	2088 FIRE LANE RD	BELLINGHAM	WA	98229	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76769
HILTY, KEITH T.	137 POND RD	SPRING CHURCH	PA	15686	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		75998
HINMAN, JONATHAN B.	BOX 2773	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		58183
HOBLET, TOM C.	BOX 108	FALSE PASS	AK	99583	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		56169
HOLMBERG, ARTHUR J.	BOX 78	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		17076
HOPPE, TODD	BOX 2589	HOMER	AK	99603	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		05721
HUDSON, DEVIN C.	BOX 612	METLAKATLA	AK	99926	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		64392
HUTTER, MATTHEW	BOX 3543	HOMER	AK	99603	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78286
IVANOFF, REUBEN J.	BOX 8883	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		21900
JACOBSEN, DICK	307 RED COVE RD	SAND POINT	AK	99661	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		25187
JENSEN, ROSS	363 28TH ST	PORT TOWNSEND	WA	98368	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		13140
JOHANNESSEN, NORMAN E.	23631 112TH PL W	WOODW02	WA	98020	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		40762
JOHNSON, ROBERT M. *	BOX 490	HOMER	AK	99603	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		47952
JOHNSON, RYAN P.	BOX 1294	HAINES	AK	99827	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		42892
KAVANAUGH, GARRETT B.	1533 SAWMILL CIR	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78238
KAVANAUGH, RONALD J.	1533 SAWMILL CIR	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78238
KONSTITZKE, KONRAD	11106 S RUSSION CREEK RD	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77327
KUZAKIN, BERT L.	440 W 123RD AVE	ANCHORAGE	AK	99515	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		41035
KUZMIN, SERGI	BOX 264	DELTA JUNCTION	AK	99737	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		56249
LANTZ, RICHARD A.	BOX 1731	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78274
LARSEN, ROBIN	BOX 264	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		62901
LEVENSON, TIM J.	BOX 1284	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		45140
LEY, BEN	8316 WINDING RUN RD	ST LOUISVILLE	OH	43071	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		09185
LONG, RYELAN	2530 W ANGELAS DR	WASILLA	AK	99623	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		68008
LONG, RYELAN	2530 W ANGELAS DR	WASILLA	AK	99623	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		68008
LUKIN, GREGORY	BOX 1324	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		57747
LUNDGREN, TAYLOR	BOX 216	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		61395
MACK, KENNETH JR.	BOX 108	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		36134
MACK, KENNETH B. SR.	BOX 176	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		38933
MAGNUSSON, ROBERT	4150 SWEET RD	BLAINE	WA	98230	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		35418
MAY, RAYMOND M.	BOX 8985	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76436
MILES, FRANK	BOX 2744	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		23258
MILLER, JASON L.	BOX 1473	PETERSBURG	AK	99833	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		40128
MOILANEN, JASON	BOX 1705	PETERSBURG	AK	99833	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		38948
MOREY, DAVID B.	200 W 34TH AVE PMB #653	ANCHORAGE	AK	99503	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77897
NEATON, PETER	BOX 30	UNALASKA	AK	99685	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78919
NEUNEKER, MIKE	BOX 52	PETERSBURG	AK	99833	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		89178
NEWMAN, ALVIN J. JR.	BOX 248	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		41401
NILSEN, YANCEY L.	BOX 1822	PETERSBURG	AK	99833	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77934
NUTT, RAYMOND E.	BOX 122	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		10495
OSTERBACK, WILLIAM K.	BOX 144	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		17745
PEDERSEN, DALE E.	9218 CAMPBELL TERRACE DR	ANCHORAGE	AK	99502	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		57469
PEDERSEN, DEAN	BOX 877325	WASILLA	AK	99687	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		18208
PHILLIPS, JEB	BOX 1253	PETERSBURG	AK	99833	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77144
PIKUS, PATRICK J.	BOX 2843	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		00040
RAGAN, RICHARD	5940 GREECE DR	ANCHORAGE	AK	99516	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		78720
RASTOPSOFF, THOMAS	BOX 8885	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		31170
REUTOV, MAVRIK S.	BOX 910	HOMER	AK	99603	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		59706
ROSE, NATHANIEL	1812 MISSION RD	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		58817
ROTTER, JOHN R.	BOX 405	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		62901
SAGER, BILL R.	BOX 202	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		07011
SAMUELSON, HERMAN E.	BOX 8	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		41906
SHAISHNIKOFF, TREVER W.	BOX 131	UNALASKA	AK	99685	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		24592
SPOKAS, MICHAEL H.	3851 FOXTAIL LN	HELENA	MT	59602	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		75473
STONOROV, IVAN	41046 CRESTED CRANE ST	HOMER	AK	99603	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		26020
SULLIVAN, ABRAHAM	17710 TEKLANIKA DR	EAGLE RIVER	AK	99577	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76584
SWICK, KENNETH JR.	BOX 112	SELDOVIA	AK	99663	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		29390
SYLCE, CHRIS	51053 E END RD	HOMER	AK	99603	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		76477
THOMPSON, KILEY	BOX 116	SAND POINT	AK	99661	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		62844
TROSVIG, JOSHUA L.	BOX 17911	SEATTLE	WA	98127	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNCI2022		77211

VARGO, ZACHARY T.	BOX 8732	KODIAK	AK	99615	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNIC2022	00040
WILLIAMS, KEITH	1924 E COLGATE DR	TEMPE	AZ	85283	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNIC2022	26280
WILSON, ANDREW	BOX 267	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNIC2022	76676
WILSON, JUSTIN C.	BOX 267	KING COVE	AK	99612	M09G	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNIC2022	41044
YOUNG, JERAMY W.	BOX 2119	KODIAK	AK	99615	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNIC2022	75343
ZWAHLEN, RONALD W.	BOX 1427	HOMER	AK	99603	M09B	MISCELLANEOUS SALTWATER FINFISH, POT GEAR VL UNIC2022	76858

231 >60' trawl captains

86% NON - Alaskan

14% Alaskan

Name	Street	City	State	Zip Code	Fishery	Description
AARSKOG, ARVE	5825 111TH ST SW	MUKILTEO	WA	98275	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
ALLINSON, CHRISTOPHER N.	624 VAN WYCK RD	BELLINGHAM	WA	98226	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
AMUNDSON, DENNEY	19703 28TH DR SE	BOTHEL	WA	98102	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
ARRUELA, LUIS H.	2816 NW 92ND ST	SEATTLE	WA	98117	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
ARRUELA, PAULO	2816 NW 92ND ST	SEATTLE	WA	98117	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
ASHLEY, BERT	BOX 425	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BAKER, PHILIP	1549 BAKER RANCH LN	OAK HARBOR	WA	98277	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BAKKEN, NORMAN	11689 E 35TH PLACE	YUMA	AZ	85367	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BARNETT, JEFFERY	4201 21ST AVE W	SEATTLE	WA	98199	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BARNHART, CLAYTON	179 WRIGHT CREEK RD	TOLEDO	OR	97391	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BARNHART, STUART T.	26016 NE 227TH ST	BATTLEGROUND	WA	98604	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BEARD, STEVEN H.	BOX 568	TOLEDO	OR	97391	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BEAVER, BRIAN G.	10 BEAVER HILL LN	MONTESANO	WA	98563	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BEAVER, MICHAEL	BOX 82410	KENMORE	WA	98028	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BISHOP, DAVID D. JR.	4201 21ST AVE W	SEATTLE	WA	98119	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BLAKE, MAVERICK	19858 NE 140TH ST	WOODINVILLE	WA	98077	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BLUMENTHAL, JONATHAN	356 ASPEN DR	COALVILLE	UT	84017	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BOLTON, CRAIG W.	59 BIRCH BANKS RD	SAGLE	ID	83860	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BOYDSTON, LARRY	1322 NW DEER DR	TOLEDO	OR	97391	M7HG	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BRYANT, SCOTT	4201 21ST AVE W	SEATTLE	WA	98199	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BUCHAN, JOSHUA G.	877 HAILEY CT	SAN MARCOS	CA	92078	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BURBACH, ARRON	4201 21ST AVE W	SEATTLE	WA	98199	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BURGETT, MICHAEL	BOX 920747	DUTCH HARBOR	AK	99692	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
BURN, SIMON E.	BOX 40	NEWPORT	OR	97365	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
BUSKIRK, JAMES M.	161 LOVELL AVE SW	BAINBRIDGE ISLAND	WA	98110	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
CARNEY, DANIEL G.	380 S AUGUST CIR	WASILLA	AK	99654	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
CHIRRIK, ROCKY L.	320 YASEK LP	TOLEDO	OR	97391	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
CLARK, RICK	2480 SW 37TH ST	REDMOND	OR	97756	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
COCHRAN, KEITH M.	BOX 616	NEWPORT	OR	97365	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
COCHRAN, KURT M.	BOX 290	SILETZ	OR	97380	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
COHEN, JEDEKIAH	61870 WARD RD	BEND	OR	97702	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
COOPER, CHRISTOPHER	24000 HWY 20	PHILOMATH	OR	97370	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
CORTEZ, KIRK	2645 MILL BAY RD	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
COX, DANA	17390 KILLDEER DR	BEND	OR	97707	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
CRAIN, JEFF	14115 66TH AVE NW	STANWOOD	WA	98292	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
CURIEL, GUILLERMO M.	13114 123RD AVE E	PUYALLUP	WA	98374	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
DACRUZ, JOAQUIM P.	21115 E CAMINA PLATA	QUEEN CREEK	AZ	85142	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DAHL, DAVID A.	BOX 11	SOUTH BEND	WA	98586	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
DAVISSON, RICKMON	BOX 3015	WESTPORT	WA	98595	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
DEDMORE, PAT	2025 1ST AVE SUITE 900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DEHNING, CORY R.	BOX 1021	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
DIETRICH, DAN	5511 134TH ST COURT NW	GIG HARBOR	WA	98332	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DOMAR, ACACIO M.	2233 NW 59TH ST APT 5	SEATTLE	WA	98107	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DONOVO, ANTONIO	14102 NE 2ND ST	BELLEVEUE	WA	98007	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
DOREMUS, STEVE A.	5215 CATOCTIO DR	SAN DIEGO	CA	92115	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DOYLE, KEVIN J.	850 BEECH ST UNIT 1801	SAN DIEGO	CA	92101	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DRENNAN-LINDQUIS, PAUL	11611 NE ANGLEO DR UNIT 109	VANCOUVER	WA	98684	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
DURNAN, THOMAS J.	7739 SUMMIT VIEW LAND	CLINTON	WA	98236	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
EADS, SAM	BOX 8805	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
EGAAS, JAMES L.	18463 NE 196TH PL	WOODINVILLE	WA	98077	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
EKLUND, DARRIN	BOX 128	GIG HARBOR	WA	98335	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
ELLIOTT, STEVEN B.	8504 184TH ST SW	EDMONDS	WA	98028	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
ERICKSON, BRANDON	2025 1ST AVE STE 900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
EVERICH, JAKE S.	3932 WOLVERINE WAY #1	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
FAYMOVILLE, ANTHONY M.	825 81ST AVE NE	SPRING LAKE PARK	MI	55432	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
FISCHER, RAYMOND	4201 21ST AVE W	SEATTLE	WA	98199	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
FITZGERALD, WILLIAM B.	1801 FAIRVIEW AVE E #100	SEATTLE	WA	98102	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
FOGG, DAN T.	25564 BUCK HORN RIDGE RD	PIONEER	CA	95666	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FRANULOVICH, CHRIS	4619 HICKORY DR.	ANACORTES	WA	98221	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FREEBURG, CHARLIE	120 MOUNTAIN SHIRE LANE	SOMERS	MT	95932	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FREESE, JEFFERY L.	BOX 189	LONG BEACH	WA	98631	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FRENCH, ED	BOX 411	TOLEDO	OR	97391	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FRENCH, JAMES W.	985 S 70TH ST	SPRINGFIELD	OR	97478	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FREY, AARON S.	1420 SE OAR AVE	LINCOLN CITY	OR	97367	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
FUI, FIAALI	529 PRINCE ARTHUR BLVD	N/A	N/A	N/A	N/A	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GARBRICK, MARK	4225 23RD AVE W #103	SEATTLE	WA	98199	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GARLAND, JAMES	BOX 1248	NEWPORT	OR	97365	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
GARRISON, JEFFERY R.	5303 SHILSHOLE AVE NW	SEATTLE	WA	98107	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GLEB, JOSEPH E. JR.	4201 21ST AVE WEST	SEATTLE	WA	98199	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GOLSTON, MICHAEL	5830 6TH AVE APT D 36	TACOMA	WA	98406	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
GRAESDAL, ROLF	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GRAHAM, ROBERT	3433 ANTONE WAY	KODIAK	AK	99615	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GREEN, TATE	25 TORRENCE LANE	OAK HARBOR	WA	98277	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GREENWOOD, BRUCE	BOX 1371	SONOITA	AZ	85637	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
GRIFFIN, EVAN	1641 CHASA ST	EUGENE	OR	97401	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HADDON, RAYMOND R.	8216 61ST AVE NW	GIG HARBOR	WA	98332	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HALEY, BRIAN E.	BOX 936	BLACK DIAMOND	WA	98010	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HALEY, PATRICK J.	4201 21ST AVE W	SEATTLE	WA	98199	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HANBURG, LOGAN	3867 VISTA DR	NORTH BEND	OR	97459	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HARRINGTON, ROBERT W. III	838 SARGENT CREEK RD	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HAWLEY, BRETT C.	15205 W DESERT MIRAGE DR	SURPRISE	AZ	85379	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HELLIGSO, MIKE	11962 GARA DR	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HELMERSEN, DAVID H.	3695 STEELHEAD DR	GREENBANK	WA	98253	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HENDERSON, WALT	BOX 459	NEWPORT	OR	97365	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HESBERG, PER	2910 NE KIMILA DR	ALBANY	OR	97321	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HEZEL, ROBERT	6164 COUNTRNER CT	CLINTON	WA	98236	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HOCKEMA, GABRIEL E.	21520 FLETCHER LN	BEND	OR	97701	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HOCKEMA, JOHN C.	1717 LARCH ST	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HOGSETH, JARL	4836 SOUNDSDIE DR	GULF BREEZE	FL	32563	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
HOLT, JEREMY J.	BOX 1635	NEWPORT	OR	97365	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
HOPKINS, TERRY	554 BLACKSTRAP RD	FALMOUTH	ME	04105	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
HOUSTON, EDWARD	BOX 1074	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
IANKOV, STEFAN	BOX 761	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
ISON, DOUGLAS F.	1800 N COLE RD APT 1 302	BOISE	ID	83704	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
JASTAD, KURT	BOX 15112	MILL CREEK	WA	98082	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
JENSEN, DAVID O.	22128 STATE ROUTE 9 LOT#101	MOUNT VERNON	WA	98274	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
JENSEN, KJELL	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
JENSEN, SCOTT	20607 70TH ST SE	SNOHOMISH	WA	98290	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
JENSSEN, CRAIG	2107 9TH ST	ANACORTES	WA	98221	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder

JOHNSON, JENS P.	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
JOHNSON, CHANDLER B.	BOX 948	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
JOHNSON, DALE JR.	333 1ST AVE W	SEATTLE	WA	98119	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
JOHNSON, JOSIAH	36555 KENAI SPUR RD #144	SOLDOTNA	AK	99669	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
JOHNSON, MICHAEL A.	4008 FOREST PK CT NW	OLYMPIA	WA	98502	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
JOHNSON, STEVE	333 1ST AVE W	SEATTLE	WA	98119	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
JORGE, DAHER A.	BOX 98929	LAKEWOOD	WA	98496	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
JOSOK, ODDVIN	2025 1ST AVE STE 900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
KAPP, FREDERICK R.	2204 208 ST SW	LYNNWOOD	WA	98036	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
KASPER, JAMES A.	750 N S LOW RD	SEAL ROCK	OR	97376	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
KASPER, KENNETH	8693 GRIFFIN DRIVE	MONMOUTH	OR	97361	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
KEHOE, GERALD	485 CENTRE ST	MILTON	MA	02186	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
KELLISON, RAY L.	15331 SR 20	COUPEVILLE	WA	98239	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
KENNEDY, TONY B.	BOX 1634	NEWPORT	OR	97365	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
KENNY, SHAWN	16722 39TH AVE NE	LAKE FOREST PARK	WA	98155	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
KNOTTEN, OLE	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
KRALJEVICH, MICHAEL D.	6503 146TH ST SE	SNOHOMISH	WA	98296	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
KREY, SCOTT	19064 10TH AVE NE	POULSBRO	WA	98370	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
KUHR, ARTHUR	11098 CARAMEL CREST COURT	LAS VEGAS	NV	89135	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LANG, SCOTT	29812 5TH AVE SW	FEDERAL WAY	WA	98023	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LANGDON, ROBERT B.	709 SARGENT CREEK RD	KODIAK	AK	99615	M7GG	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
LASHUA, MARC	2801 WESTERN AVE 135	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LIESKE, MATTHEW	2415 T AVE #208	ANACORTES	WA	98221	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LOAN, RICK	3681 N CORGETT WASH CT	TUCSON	AZ	85745	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LOEWEN, OSCAR	12084 S SHADOWHILLS CT SE	TURNER	OR	97392	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LONGAKER, GARY	9210 232 ST SW	EDMONDS	WA	98020	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LOOSE, ELMER P.	BOX 6	ADNA	WA	98522	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
LOPER, CHRISTOPHER	6009 ELK CITY RD	TOLEDO	OR	97391	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
LYNN, BRANDON M.	20214 108TH DR SE	SNOHOMISH	WA	98296	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MACIEJSKI, MIROSLAW	6421 SPRUCE ST	ANCHORAGE	AK	99507	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MACKINNON, ROBERT	23 SPRING ST	CAMDEN	ME	04843	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MADEJA, SAM O.	91-275 HANAPOULI CIR APT H	EWA BEACH	HI	96706	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MALACHOVSKY, NICK	6515 152ND AVE E	SUMNER	WA	98390	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MALCOLM, HOWARD G.	14069 ERVINE RD	ANACORTES	WA	98221	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MANGAN, PAUL	4460 184TH AVE SE	ISSAQUAH	WA	98027	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MANNES, FRANK	18525 8TH AVE NW	SHORELINE	WA	98177	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MANNES, JOHAN	8228 234TH ST SW	EDMONDS	WA	98026	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MANNES, STEINAR	3522 129TH PL SE	EVERETT	WA	98208	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MARTIN, DANIEL A.	BOX 2440	SUNRIVER	OR	97707	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MASON, JEFF	13816 43RD AVE SE	MILL CREEK	WA	98012	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MAVAR, BRIAN F.	604 SAINT MARYS DR	ANACORTES	WA	98221	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MAYOR, STEVE	399 S SANTA ROSA AVE	EL CENTRO	CA	92243	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MCARDLE, ARTHUR	111 RATHFARNHAM CIR	ASHEVILLE	NC	28803	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MCCABE, PAUL	11128 WOMENS BAY DR	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MCCARTHEY, WILLIAM	1801 FAIRVIEW AVE E #100	SEATTLE	WA	98102	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MCCARTHY, JOHN P.	11555 MIDDLE BAY E	KODIAK	AK	99615	M7GG	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
MCCAAY, DANIEL	2799 JENJAR AVE	FERNDALE	WA	98248	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MCELHENIE, MICHAEL R.	BOX 8390	KODIAK	AK	99615	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MCGRORTY, PATRICK	8200 HANSEN RD NE	BAINBRIDGE ISLAND	WA	98110	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MCKENZIE, TIFFANY M.	BOX 8082	KODIAK	AK	99615	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MCPLEAK, BRUCE A.	592 SKAMANIA LANDING	STEVENSON	WA	98648	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MCQUAW, AXEL	BOX 1251	NEWPORT	OR	97365	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MENDES, CASIMIRO	17708 SNOHOMISH AVE	SNOHOMISH	WA	98296	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MINKOFF, GARY E.	780 BUNKER CK RD	CHEHALIS	WA	98532	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MOLAN, GUSTAV	45 NW GORDON RD	BEND	OR	97703	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MOORE, ERIN	1886 HILLSBORO DR	HENDERSON	NV	89074	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MORGAN, STANLEY	6504 FRANCIS LOOP SE	AUBURN	WA	98092	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
MORRICE, BRUCE D. JR.	BOX 234	TOLEDO	OR	97391	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
MURDOCK, MIKE	505 TORDEN LN SE	OLYMPIA	WA	98513	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
NAUGHTON, RONALD W.	BOX 3210	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
NELSON, JOHN C.	5517 MOOSE MEADOWWAY	DEER PARK	WA	99006	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
NETO, CAMILO	3404 31ST DRIVE	EVERETT	WA	98201	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
NOGACKI, TADEUSZ	421 E HARVARD AVE #2	ANCHORAGE	AK	99501	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
NORG, TONY	BOX 359	GRAYLAND	WA	98547	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
ODONNELL, PATRICK	BOX 3075	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
OLSEN, ROY H.	760 AUTUMN LN	BELLINGHAM	WA	98226	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
OREJUELA, EDUARDO	4201 21ST AVE W	SEATTLE	WA	98119	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
PACK, PETER	1822 72ND ST SE	AUBURN	WA	98092	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
PAGE, DALE	BOX 94	BOOTHBAY HARBOR	ME	04538	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
PALMBY, RICHARD	124 NORTH SHORE DR	BELLINGHAM	WA	98229	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
PAYLOR, BRENT	504 E CYPRESS AVE	GLENDORA	CA	91741	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
PENDLETON, KEITH	2001 W GARFIELD ST TR #91 C-107	SEATTLE	WA	98119	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
PERRY, LORIN	23725 196TH AVE SE	MAPLE VALLEY	WA	98038	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
PETERSON, CHRISTOPHER D. JR.	4804 N 31ST ST	TACOMA	WA	98407	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
PIECHURA, JOSEPH	26820 119TH AVE SE	KENT	WA	98030	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
POTTER, JAMIE	18160 COTTONWOOD RD PMB 211	SUNRIVER	OR	97707	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
QUANDT, JOHN	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
REARDON, MICHAEL J.	4201 21ST AVE W	SEATTLE	WA	98119	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
REEF, DARREN	38876 NORDLUUD MCCOY LN	ASTORIA	OR	97103	M7GG	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
REYNOLDS, LOREN	6 GREEN MEADOWS DR	SHERIDAN	WY	82801	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
ROBERTS, ARIK	BOX 280	BROOKINGS	OR	97415	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
ROHDE, MATTHEW	10580 CHINIAK DR	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
ROUSAR, REED W.	BOX 281	FRIDAY HARBOR	WA	98250	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
ROWE, BRANNAN	4201 21ST AVE W	SEATTLE	WA	98119	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
ROZEWSKI, KRYSPIAN	2090 SE AMMON RD	TOLEDO	OR	97391	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
SCHONES, MICHAEL J.	BOX 711	NEWPORT	OR	97365	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
SERANO, RICHARD S.	608 W PIONEER	PUYALLUP	WA	98371	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
SIPOS, BENJAMIN	17753 NOLL RD NE	POULSBRO	WA	98370	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
SITTON, DON	BOX 2434	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
SLATER, DEAN	BOX 921007	DUTCH HARBOR	AK	99692	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
SMITH, CLAYTON	19381 INDIAN SUMMER RD	BEND	OR	97702	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
SMITH, DAVE E.	BOX 1650	NEWPORT	OR	97365	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
SPAIN, STEVEN D.	BOX 226	SOUTH BEND	WA	98586	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
ST.CROIX, FRANCIS J.	3 LINDEN ST	KINGSTON	MA	02364	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
STAM, MARTIN D.	84488 BRISTOW RD	PLEASANT HILL	OR	97455	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
STAM, TOM	BOX 459	NEWPORT	OR	97365	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
STARR, RICHARD K.	1518 REZANOF	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', Permit holder
STARR, ROBERT C.	2201 OLYMPIC DRIVE	ANCHORAGE	AK	99515	M7GG	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
STEVENS, BROOKS IV	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
STYKE, BRIAN E.	1861 LANCASTER RD	FREELAND	WA	98249	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder
SULLIVAN, GLENN	15191 GIBRALTER RD	ANACORTES	WA	98221	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', Permit holder

SUMMERS, JAMES R.	2415 T AVE #208	ANACORTES	WA	98221	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
SYMONDS, SCOTT	7388 REMINGTON LN	ANACORTES	WA	98221	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
TEGNER, TIVEN N.	BOX 1650	NEWPORT	OR	97365	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
THALMAN, DAN	BOX 8869	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
THOMAS, TIMOTHY W.	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
THORPE, RYAN V.	48702 CHRISMAN LN	FORD	WA	99013	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
TIPLER, WAYNE A.	BOX J	SOUTH BEND	WA	98586	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
TORGERSON, MARIO	10512 45TH ST CT E	EDGEWOOD	WA	98372	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
TOWER, ERIC	567 PIONEER TRAIL	TOLEDO	OR	97391	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
URI, KONRAD C.	12922 50TH PL W	MUKILTEO	WA	98275	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
VANBRERO, KURT J.	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
VANDERPOL, DARIN	484 W POLE RD	LYNDEN	WA	98264	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
VANONI, VITTORIO G. JR.	16105 SE 45TH CT	BELLEVEUE	WA	98006	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
VARGAS, FRANK A.	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
VARGAS, RAUL	BOX 11673	YAKIMA	WA	98901	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
VARGAS, RAUL	BOX 11673	YAKIMA	WA	98901	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WATERS, CURT D.	2195 SELIEF LN	KODIAK	AK	99615	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
WEBER, BRIAN	2025 1ST AVE #900	SEATTLE	WA	98121	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WHITE, ADAM	1011 PLAZA SIENNA	LAKE HAVASU CITY	AZ	86406	M7IG	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WIECHMANN, ERIC	8222 LUPINE LN	CLINTON	WA	98236	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WIGGINS, MIKE	316 SE PIONEER WAY #442	OAK HARBOR	WA	98277	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WILLIAMSON, CHRISTOPHER C.	928 KRAFT WAY	KODIAK	AK	99615	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
WILLMORE, DAVID W.	BOX 1227	FERNDALE	WA	98248	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
WOOD, JOHN	11528 SEOLA BEACH DR SW	SEATTLE	WA	98146	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
WRIGHT, GREG	BOX 387	BOOTHBAY	ME	04537	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WRIGHT, SAM R.	19337 BERNARD DR	EAGLE RIVER	AK	99577	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
WYATT, RICHARD D. JR.	BOX 129	MONTESANO	WA	98563	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
YECK, FRED JR.	BOX 871	NEWPORT	OR	97365	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
YETTER, BARRY	BOX 31094	BELLINGHAM	WA	98228	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
YORK, DAVID	10650 E BLANCHE DR	SCOTTSDALE	AZ	85255	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder
YOUNG, JEREMIAH T.	BOX 491	SILETZ	OR	97380	M7GB	MISC SALTWATER FINFISH, OTTER TRAWL VL 60' TO UNDEPermit holder
ZABLE, MARK	BOX 1150	ROCKLAND	ME	04841	M7HB	MISC SALTWATER FINFISH, OTTER TRAWL VL 90' TO 125', \$Permit holder
ZOCH, SPENCER	10192 RD 5.6 NE	MOSES LAKE	WA	98837	M7IB	MISC SALTWATER FINFISH, OTTER TRAWL VL OVER 125', \$Permit holder

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 9, 2022 8:48 PM

### First Name

Peter

### Last Name

Neaton

### Community of Residence

Unalaska, AK

### Write your comment here:

To Whom it May Concern  
In Opposition to a proposals 5 And 6

My name is Pete Neaton, age 33, I have participated in the Area O state water fishery since its inception in 2014. First as a deckhand, then I had the opportunity to invest in a new boat and captain that boat myself. In the 8 years of participating in the fishery, my operation has helped no less than 7 people, mostly Alaskan residents, reinvest into small boat fishing operations of their own. I urge you: do not yield or submit to the Federal group pressure. The little quota we can secure and manage at the state level will directly benefit resident families. Our fleet is 90%Alaskan owned and operated. This is the purest form of direct-result quota-to-resident profit. Look behind the curtains of the so-called CDQ groups and you'll be lost in a maze of bureaucracy that funnels into the pockets of out-of-state shareholders. This is nothing but a fish grab from corporate interests. Do not give up the ground we fought to gain in years past. The CDQ program has been dirtied up by corporate interests. We small boats are still traceable to the family interests involved. No good will come of this proposal. If the CDQ groups want a piece of the action my suggestion would be to build a 55' by 30' wide boat and tap into the new, local small boat culture of Unalaska.

**Proposal 5** - Oppose

**Proposal 6** - Oppose

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 7:56 PM

**First Name**

Michael

**Last Name**

Nelson

**Community of Residence**

Kodiak, AK

**Write your comment here:**

I support prop 2, but I'd have to oppose 3,4,5,&6.

**Proposal 2** - Support

**Proposal 3** - Oppose

**Proposal 4** - Oppose

**Proposal 5** - Oppose

**Proposal 6** - Oppose



United States Department of the Interior  
Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199



OSM.22115.GP

OCT 7 2022

Ms. Märít Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Alaska Board of Fisheries will consider 11 proposals at its Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod Meeting from October 27-28, 2022.

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the proposals and believes that adoption of any of these proposals will not have significant impacts on Federal subsistence users or fisheries. During the meeting, OSM may wish to comment on other agenda items that may impact Federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to continuing to work with the Alaska Board of Fisheries and the Alaska Department of Fish and Game.

Sincerely,

Sue K. Detwiler  
Assistant Regional Director,  
Office of Subsistence Management

Cc:

Anthony Christianson, Chair, Federal Subsistence Board  
Interagency Staff Committee  
Benjamin Mulligan, Alaska Department of Fish and Game, Anchorage  
Art Nelson, Alaska Department of Fish and Game, Juneau  
Mark Burch, Alaska Department of Fish and Game, Palmer  
Administrative Record, Office of Subsistence Management, Anchorage

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 5:36 PM

### First Name

Jacob

### Last Name

Privat

### Community of Residence

Homer, AK

### Write your comment here:

I'm writing in opposition to proposal 6. This state water fishery has been crucial in my ability to purchase a home and property in Alaska, and has allowed me to invest into other state fisheries. It is not in the states interest to accept this proposal.

**Proposal 5** - Oppose

**Proposal 6** - Oppose

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: September 19, 2022 12:48 PM

### First Name

Michael (YLE)

### Last Name

Spokas

### Community of Residence

Helena, Montana

### Write your comment here:

This comment was sent to the ADF&G Dutch Harbor office on September 7, 2022 by Michael Spokas, captain of the F/V St Paul. Mr. Spokas is currently fishing and unable to send the comment.

It is no newsflash that as a collective group, we need the State water harvested. A few of us had to stop State water fishing to fulfill other fishing obligations. For example, the St. Peter and St Paul have CDQ to fish; many others have black cod and halibut to fish; and others were just worn out and needed a break. My recommendations are as follows:

1. On April 1st the exclusive State water registration is void between BS and AI; and
2. On April 1st the BS pot limit can increase to (75 – 90).

I believe these actions would help everyone maximize the State water quota, especially with increased TAC.

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 10, 2022 8:20 AM

### First Name

Robert

### Last Name

Thorstenson

### Community of Residence

Juneau

### Write your comment here:

Oppose Proposal 6.

The only major bycatch reduction initiative that Alaska has ever devised came into being with the introduction of the Area O pot cod fishery.

It was begun in 2014 and has taken the Bering Sea by catch levels down by a solid 10% in less than a decade. This has saved millions of pounds of otherwise discarded halibut that would have been taken by the factory freezer longline fleet and the daggers.

In every other cod fishery in Alaska, from Prince William Sound and Kodiak to Chignik and False Pass and Sand Point the pot cod state waters are harvesting 25% of the local TAC.

It should be thus in the Bering Sea as well.

But we are in a system that very slowly and gradually increases our harvest proportion in the last all Alaskan small boat open access fishery left.

There should be no changes to Area O.

Unless the board of fisheries in its infinitive wisdom, determines to raise the 2026 goal to 20 or 25% from the current 15

**Proposal 6 - Oppose**

## Board of Fisheries - Pacific Cod Meeting Comments

Submitted Time: October 11, 2022 9:04 PM

### First Name

Dustan

### Last Name

Dickerson

### Community of Residence

Unalaska, Alaska

### Write your comment here:

Proposal 5.

The Unalaska Native Fishermen's Association is formally withdrawing our proposal to place length restrictions on vessels using pot gear, between Priest Rock and Bishop Pt. during the GHL fishery.

We are withdrawing our proposal in order to accommodate community members who, while not having fished these waters for a number of years, would like to maintain the flexibility to do so. We feel these protections are necessary, but that harmony within the community is perhaps more important at this time. We reserve the right to re-address this issue during the next cycle. Time will tell..

UNFA

**Proposal 5** - Withdrawal

October 11, 2022

To the Alaska Board of Fisheries

**Re: Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod Proposals**

Chair Carlson-Van Dort and Members of the Board,

I am writing to you on behalf of the Under Sixty Cod Harvesters (USCH). USCH represents vessels under 60 feet harvesting Pacific cod in state and federal fisheries in the Bering Sea, Aleutian Islands and Gulf of Alaska. **USCH opposes Proposal 5 and Proposal 6, which recommend allocative changes that are not in the best interests of the fishery, its participants, or the State of Alaska.**

**Background: Opportunity and access for Alaskan fishermen**

Under 60 pot-cod vessels are home-ported in coastal hubs across Alaska, from Petersburg to Dutch Harbor. The owners, skippers and crew of these vessels are more than 80% Alaskan residents, and they run thriving year-round work platforms providing meaningful economic opportunity for hundreds of crew, tradesmen and support businesses across rural Alaska. These vessels are hubs of livelihood opportunity and economy for fishing communities and families. While many participate in halibut and sablefish fisheries, or salmon tendering, statewater cod fisheries offer a critical winter economy to fishery participants, their families and dependents, the shore-based processing plants they deliver to, and the rural communities that rely on seasonal influxes from these critical resources.

This fleet has been a path to success for young professional fishermen, in part because of the open access nature of the fishery. A successful, and stable, year-round fishing business often depends upon diversified access to multiple seasonal fisheries. Statewater salmon fisheries continue to be a good entry-level crew, operator and even owner option for younger fishermen, but branching beyond the summer season can be more challenging. For the next generation of fishermen, diversifying into IFQ fisheries like halibut or sablefish has gotten increasingly cost-prohibitive as access shares have consolidated and risen exponentially in price-per-quota-pound.

Cod offers a critical alternative. While gear and vessel costs in pot fisheries are not insignificant, access rights are affordable, and the timing is right to diversify from other opportunities. Over time, participants in the under 60 pot sector have been successfully working their way up into the wheelhouse and professional fishing careers. We see young Alaskans gaining critical experience, taking crew shares and investing in other small-boat fisheries, or investing back into the cod fishery by buying into a vessel individually or in partnership with other fishermen. We also see veteran harvesters able to diversify and maintain successful operations that contribute jobs, economy and fish-over-the-dock for Alaska's fishing communities and families. They provide millions of dollars in ex-vessel value into the state each year, (\$10-16M annually in the last 5 years) with exponential benefits through coastal economies, and they do so with very little habitat footprint, or bycatch.

**Proposal 5**

USCH opposes proposal 5, which suggests that the BOF create a new fishing sector, and carve up the existing statewater fishing grounds between boats smaller than 56 feet, and

those that are 56 or larger. **This change is not needed, and creates additional safety issues for the entire fleet.**

The proposer implies that statewater pot vessels are displacing longline vessels harvesting cod in the federal fishery. However, Department staff comments on the proposal show that less than 5% of the statewater cod GHL has been harvested in that area, with the exception of two years in which the fishery operated in a subset of the primary area. It also shows that 5 or less pot boats (under and over 56 feet) and 5 or less longline vessels, have harvested cod in the smaller area since 2014. This information, found in tables 12-14 in the staff comments, does not illustrate a serious vessel conflict or race for fish in this small area. What it does help to illustrate is that this area is used in moderate amount by a diversity of small boats — pot, longline, under 56 and over 56. When winter fishing in the Bering Sea, a vessel under 60 feet is a small boat, whether it's 55 feet or 59 feet. All of these vessels occasionally need areas close to town to fish. New skippers working on a vessel or with a new crew for the first time need safe places to run gear. Most importantly, every crew participating in this fishery deserves options for safe fishing when weather is too dangerous to go farther out. Historical use patterns do not indicate that this area is overloaded or unavailable to either smaller pot vessels or the hook and line vessels participating in the federal parallel season.

We believe it is impractical and unnecessary to create a new participant sector within this fishery, and new enforcement layer, which would benefit only one recent pot participant, and undefined but likely minimal prospective participants in the federal hook and line fishery. Smaller vessels using pot gear or hook and line gear have opportunity and area through the current regulation and management of the state and federal fisheries.

Additionally, the North Pacific Fishery Management Council recently took action to divide the federal opportunities available to the under 60 sector, which is shared between pot and longline vessels. The majority of the fleet (vessels 56 to 59 feet) will no longer have A season access to approximately 30% of the federal quota they have historically fished. Instead, vessels under 56 feet have priority access to that cod. We ask that the board consider not only that proposal 5 is unwarranted within the current conditions of the fishery, but that it would cause compounded negative impacts to the majority of the under 60 pot-cod fleet.

### **Proposal 6**

USCH also opposes proposal 6, which suggests that the Board of Fish should change how the statewater GHL is established. **The tier system proposed is inherently inequitable to the State of Alaska, and its fishery participants, in not only the Bering Sea cod fishery but any other fishery that may be affected by this precedent.**

Statewater GHGs, like all other groundfish quotas, are set as a percentage of the harvestable biomass. In the Dutch Harbor Subdistrict, that percentage amount is in a period of gradual, stair-stepped growth up to 15%. This is the smallest percentage allocated to a major statewater cod area in Alaska, as the Western and Central Gulf are set at 30% and 25%. Regardless of the GHG percentage, the number of pounds available to harvest each year rises and falls with the abundance of the resource. Yet proposers are suggesting that a new management plan is necessary to “link access to the resource to the health of the resource.”

But the Dutch Harbor Subdistrict GHL percentage is *already based* on the Federal ABC as determined in the Federal BSAI harvest specifications process, and so is *already linked* to the health of the resource.

Proposal 6 would add an *additional* layer of limitation, through a tier system in which the actual percentage afforded to the state fishery would be smaller during times of lower abundance. That is an additional layer of restriction not placed on any other Pacific cod sector. A permanent system that diminishes the statewater fishery more than others at times of low abundance is fundamentally problematic, and sets a troubling precedent for Alaska.

**Statewater users rely on many species that have interactions with federal fishing sectors, and do not benefit from the state committing to a federal use priority.**

While there are sustainable, important fisheries within the federal sectors, there are also large sectors that use cod entirely as a bycatch resource to prosecute other groundfish fisheries, as well as targeted cod fisheries that have bycatch challenges with other species. In the federal process, we continue to struggle with balancing conservation responsibilities between user groups, and have ongoing work to do around abundance-based management of halibut bycatch, meaningful and abundance-based caps in salmon bycatch, enforcement of non-hard-cap limits on non-target species such as sablefish, critical updates to essential fish habitat protections, and reduction of impacts to struggling crab stocks and their habitats. As federal participants ourselves, rooted in communities dependent upon these resources, we will continue to advocate within the federal process to improve these issues. We also believe, however, that the state should prioritize actions that affirm its independent authority to manage Alaska's fisheries. Not actions that diminish that role in favor of federal management.

There is no doubt that the federal fisheries and the CDQ programs offer important benefits to Alaskans, but this issue transcends allocation disputes between sectors. USCH strongly supports independent State of Alaska management of the fisheries off our coastline. Regardless of who is invested in and benefiting from federal fisheries, there is no situation in which the State of Alaska should deliberately place itself as lower priority than the federal management system in the distribution of fishery resources. Alaska must commit to itself and its fishery participants as an autonomous resource manager, with clear rights to conserve and manage its fishery resources without conditions from Outside jurisdictions.

We urge the Board to make no changes to this fishery, which is functioning exactly as the Board of Fisheries has intended, with strong participation from Alaskan fishermen and with significant benefit to Alaska's communities. Thank you for considering our comments.

Regards,

*Hannah Heimbuch*

Hannah Heimbuch, Executive Director, *Under Sixty Cod Harvesters*

Dear Chairwoman Carlson-Van Dort and Alaska Board of Fish Members,

For 52 years -- from Homer to Chignik, Dutch Harbor to Adak -- I've been fishing in Alaska since 1970. I'm a lifelong Alaskan resident and my family participates in almost every part of our business. I am writing to you today as a participant in Alaska's statewater cod fisheries. I think Area O fishery management is working well now, and changes to participant access or the GHM system are not in the best interests of the fishery or Alaska.

### **I oppose Proposals 5 and 6.**

My vessel, the F/V Taurus has relied on Alaska's statewater cod fisheries for almost a decade and why I invested nearly \$1million upgrading an old but reliable 58-foot steel boat into a modern fishing vessel. No matter the season, every time I'm fishing in the Bering Sea and Aleutian Islands, I'm reminded how these are some of the toughest waters on the planet. The F/V Taurus is built to be safe for my family, skipper and crew. It is a small but mighty vessel that is the culmination of my lifelong career on the ocean. Alaskans and the Board of Fish should also be proud that, through guts and forward-thinking, we've created opportunities for families to invest in our boats and communities while participating in a low bycatch fishery. At a time when our crab stocks have crashed and abundance of halibut, sablefish and salmon are threatened, we should not be giving up our state's right to manage our own low bycatch statewater pot cod fisheries.

- Proposal 6 suggests that you redesign the statewater allocation on a tiered system, a proposal I strongly disagree with. All cod harvesting sectors have an allocation percentage based on abundance. If we reduce the statewater allocation percentage at times of lower abundance, to try to ensure a certain threshold for federal sectors, **we are saying the statewater fishery is a lower priority, or somehow more resilient than the federal sectors. That's not right.**
  - It also suggests that the state has a responsibility to balance the federal sector first, before dispersing fish to its own statewater participants. **That's not right and sets a dangerous precedent for putting statewater harvests second.** While there are Alaskans participating in the federal fisheries and those are important businesses to our communities too, this issue has moved beyond allocation discussions. The State of Alaska should manage the fishery resources in statewaters, unconditionally, not just at times when there's lots of fish in the water.
- Proposal 5 would limit a portion of the fishery to boats 55 and less. The boats in this fishery, while all under 60 feet, come in a wide variety of sizes and capacities, and vessel length is only one factor. In a winter fishery in the Bering Sea, a less than 60 foot boat is small boat. While

we've seen some participants build or buy larger platforms to be safe and effective fishermen, this statewater fishery has and continues to be a meaningful opportunity for all of the under 60 vessels. We've seen many young fishermen work their way from crew to skipper to investing in a boat, and on all sizes of boats within the fishery. It's a healthy fishery and fishing opportunity, and there is no need to constrain a portion of the fleet into a smaller fishery area.

The statewater Area O cod fishery is low bycatch, and one of the most Alaskan-owned and operated fisheries in the state. Just a few years ago our fleet was less than 10. Today we're almost 30. The Board of Fish can continue this amazing success story by **opposing Proposals 5 and 6**.

Thank you,

Dan Veerhusen  
F/V Taurus  
Homer, Alaska

Chair Carlson-Van Dort and Members of the Board,

I am writing this letter to voice my opposition of Proposal 5 regarding a separate vessel length (55' and under) limitation for a subsection of the Dutch Harbor Subdistrict (DHS) pot cod fishery. As a stakeholder that has invested heavily in a vessel that meets the current size limit of this fishery, my opposition is based on further complications within management and enforcement of the fishery that would most likely result from this proposal moving forward. It must also be noted that a similar action of allocating federal cod amongst the same sector that resulted in a benefit to the newly established 55' and under subset most recently was passed at the NPFMC.

My name is Erik Velsko and I have three different vessels all 58' and under that participate in a number of different federal and state fisheries. All three vessels were purchased under the presumption that length limits in the fisheries I was participating in would remain the same in regulation. One of my vessels is a 32' Bristol Bay gillnetter. Another one of my vessels participates in the DHS cod fishery, and has at times fished in the area that Proposal 5 would exclude a vessel of that size (58'). Reasons for fishing in close proximity to Dutch Harbor for our operation included waiting for crucial mechanical parts or crewmembers, adverse weather in further reaches of the DHS and new or inexperienced Captains wanting to learn the fishery before traveling 12-24 hours in either direction laden with pot gear.

The difference between 55' and 58' can be measured in half of an arm's length, and this action as well as the latest action at the NPFMC is nothing more than an attempt to slow or stall the eventual and natural progression of any modern-day fishery. A 58' vessel harvesting cod in the Bering Sea in the middle of winter is a small boat, even considering some of the vessels that have increased their width to accommodate the adverse conditions in this rugged environment. Every fisherman participating in the DHS cod fishery has ample opportunity to harvest fish in relative volume to his/her operation. The Board shall realize that fisheries function more efficiently and smoothly with less boxes and regulation, and can look to the convoluted federal management scheme if they need examples of how complicated management and enforcement can become by creating more boxes.

Furthermore, enforcement of a 3' difference in vessel length would be burdensome and difficult. Vessels engaged in the state waters fisheries are not required to have a VMS as the federal fishery requires, so the only enforcement mechanism would be through visual observation by Alaska State Troopers. Closing Priest Rock to Bishop Pt. to 56'-58' vessels covers a substantial fishable area, and would be difficult to continually monitor. The Board should reference a nautical chart in evaluating this proposal as the way the longitude is referenced in the proposal is misleading. The area of potential closure to the 56'-58' vessels would cover over 21 nautical miles from east to west and out to the 3 nm limit established for state waters fisheries.

Maximization of width and capacity isn't segregated to the 58' limit, and there are many vessels shorter than 58' that have increased their width to maximize capacity. There are a number of

traditional 58' vessels that don't fit the criteria of a "Super 8" that this proposal would negatively impact. Crowded local grounds around Dutch Harbor between Priest Rock and Bishop Pt. in the state-waters fishery have not been a problem in recent years.

Finally, the Alaska Board of Fisheries Allocation Criteria has to be considered when allocating between commercial fisheries as determined by Peninsula Marketing Association vs. State (opinion No. 3754; dated September 20, 1991). Essentially, I believe the Board would have to create another commercial harvesting sector (55' and under) within the current sector that encompasses all vessels 58' and under, and CFEC would have to be consulted for another length designation. I believe that interpretation of the allocation criteria by the Board will determine that this action does not meet the criteria currently in place and therefore cannot be moved forward.

Regards,

Erik Velsko  
F/V Kaia  
kaiafisheries@gmail.com

Chair Carlson-Van Dort and Members of the Board,

I am writing this letter to express my concern over Proposal 6 in regards to the management of the state waters pot cod fishery in the Dutch Harbor Sub District (DHS). As a stakeholder in this fishery, a champion of small boat state waters fishing rights and a lifelong Alaskan I feel strongly that the fishery is functioning as intended, and changes are unwarranted at this time.

My name is Erik Velsko and I was born and raised in Homer, Alaska. I have been involved in state and federal fisheries since my early teenage years. I hold a number of limited-entry permits for salmon and crab, and own three vessels that participate in many different fisheries throughout the state from Bristol Bay salmon to DHS cod. Our vessels employ anywhere from 3-5 Captain/crew at a time, and work from Juneau to Dutch Harbor. Every fishery we participate in is crucial to our vessels and crew including the DHS state-waters cod fishery.

Proposal 6 submitted by a portion of the Alaskan CDQ groups seeks to redesign the current mechanism for determining Guideline Harvest Level (GHL) in the DHS small boat pot cod fishery. Currently, the GHL is based on a percentage of the overall federal Bering Sea allowable biological catch (ABC) as determined by the North Pacific Fishery Management Council in the groundfish specifications process. In 2018, the BOF increased the DHS fisheries allocation to 8% with a step-up provision of 1%/year if 90% of the allocation is harvested until an overall cap of 15% is reached.

Although this action moved more fish from the federal fishery and its participants to the state waters, the Board determined that the State of Alaska should have ample access rights to the cod resources in the near-shore waters of the Bering Sea. Proposal 6 attempts to limit the amount of State control over cod in the DHS by creating a tiered and not abundance-based approach to determining GHL for the fishery. Determining the GHL in this manner is not progressive fisheries management, and is based on limited and outdated management principles that the NPFMC has wrestled with for a number of years, especially in regards to tiered bycatch limits. The Board does not want to go down this road when determining GHL's in our State fisheries.

Currently, as the abundance of the cod stock rises and falls as determined in federal regulation by the ABC, the DHS GHL concurrently rises and falls. Determining the GHL in this manner doesn't prioritize State or federal participants because as the ABC increases the GHL increases and vice-versa. Proposal 6 attempts to prioritize federal participant's access to p. cod over those interests of the State of Alaska by placing a cap on the GHL fishery. Is it the State of Alaska's responsibility to ensure that the federal sectors of the p. cod fisheries have an ample amount of cod quota before the State takes it's slice of the now shrinking pie? If policy is executed to prioritize federal participants that have a wide range of ownership interests, that in some instances are not tied to the direct benefit of the State of Alaska, then we are entering dangerous and uncharted territory that compromises the foundation of our State's rights.

As a result of the stair-step approach determined by the BOF in 2018, the effect on the federal participants have seemed to be more drastic because cod ABC's have been at reduced levels. It's unfortunate that the BOF action in 2018 coincided with this biological reality; however, there will eventually be a cap of 15% of ABC on the DHS fishery, and **federal participants still have access to the majority of all cod harvested off the coast of Alaska.** The Board must also remember that state waters allocations in the Gulf of Alaska are set at 25% of ABC. The benefit of State waters fisheries directly to its participants are undeniable, whereas the diluted benefit to CDQ groups through ownership interests in large vessel fleets is questionable at best. The latest data from CFEC shows Alaskan ownership interest of vessels participating in the DHS pot cod fishery at over 85%. Furthermore, the majority of the Captains and crew also reside in Alaska. I'm not certain the same ratio can be realized for the larger more industrial fleets that some CDQ entities have investments in.

The fact that the DHS fishery is an open access opportunity should also not be ignored. Proponents of Proposal 6 fail to mention that their organizations have every right to participate in DHS pot cod fishery if they so choose, for in many cases, a fraction of what their investments are in other federal cod sectors. The opportunity for participation in state waters cod is available, but it also has to be utilized. Other CDQ groups are taking advantage of the DHS fishery benefit, and appear to be successful in these endeavors. It must also be noted and not ignored that this same opportunity does not exist for the U60 cod fleet in the federal arena. In fact, the U60 fleet has slowly been losing historic federal opportunity through a number of recent NPFMC actions making any and every pound of state-waters access crucial for financial survival. Many who have watched the progression of some CDQ groups from their inception feel strongly that state waters opportunities and access in the Bering Sea and Aleutian Islands seem to fall directly in line with the original intentions of the CDQ program, and are disappointed that a proposal would be submitted that would directly impact and divide fellow Alaskan fishermen that depend on these same access opportunities.

Countless young fishermen have cut their teeth on the back decks and wheelhouses of vessels in this open-access fishery and invested back into the DHS fishery or other Alaskan fisheries. As rationalization and privatization have disrupted entry opportunities in almost all of the federal fisheries, state waters opportunities remain as shining examples of true boots-on-deck to ownership success stories. On the other hand, if the Board chooses to bend to the pressure of CDQ interests, small U60 boats rooted in Alaskan communities will be disadvantaged. At the end of the day the small, independent Alaskan fishermen that have benefitted from the DHS fishery are the first ones to lose, and the winners will continue to be the most financially powerful and politically connected entities in Alaskan fisheries. The creation of the DHS small boat fishery, and the increases in allocation are working for the betterment of small boat Alaskan fishermen and direct benefits are flowing into many coastal communities as a result.

Regards,

Erik Velsko

F/V Kaia

kaiafisheries@gmail.com