

# North Pacific Fishery Management Council

Dan Hull, Chairman  
Chris Oliver, Executive Director



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October 28, 2014

Senator Mark Begich  
Unites States Senate  
111 Russell Senate Office Building  
Washington, D.C. 20510-0201

Dear Senator Begich:

On behalf of the Council, I wish to express our appreciation for your recent visit to the Council at our October meeting in Anchorage, and particularly your dialogue with our Council on current fisheries issues and your invitation to provide further details on Council management priorities and funding concerns associated with those priorities. Among our primary concerns, which you also noted in your comments to the Council, is continued adequate funding for ongoing stock assessments conducted by NOAA Fisheries and other agencies. With both funding and ship time constraints currently in play, there is the potential for critical surveys to be curtailed in both the Gulf of Alaska and the Bering Sea/Aleutian Islands. These surveys are absolutely critical to the sustainable management of our fisheries off Alaska, and any reduction in survey information translates into additional uncertainty, which further translates into lower catch limits to guard against that additional uncertainty. As you know the fisheries off Alaska account for over half of the Nation's seafood production and constitute Alaska's largest employer. Adequate funding to maintain, or enhance if possible, our basic fisheries stock assessment surveys is fundamental to maintaining Alaska fisheries as a model of sustainable management.

Also critical to our overall management mission is our comprehensive observer program, which deploys over 35,000 observer days annually in our Council managed fisheries. Under our recent restructuring, the fishing industry still pays the lion's share of direct observer costs, through a 1.25% fee on all landings. For 2015 we expect a \$1.1 million gap between the amount collected through the fee program and the actual costs of maintaining existing observer coverage levels. We have recently requested NOAA Fisheries leadership to consider funding this shortfall in 2015, as well as to prioritize internal cooperative research funding to assist the Council in its goal of having an operational electronic monitoring (EM) program by 2016 for portions of the small boat, fixed gear fleet for which human observers pose a physical and logistical challenge.

The additional costs of administering the program, about \$5 million per year, are borne by the Alaska Fisheries Science Center (AFSC), which includes training and debriefing of observers. We understand their budget has been reduced by nearly \$.5million in recent years, which compromises their ability to train and debrief observers in a timely fashion, and could impede our cooperative efforts with NMFS to get an operational EM program on the water in 2016. Our recent request to NOAA Fisheries leadership also requested that they consider reinstating this funding on a permanent basis in order to maintain the minimum resources necessary for the AFSC to effectively administer our restructured observer program, including our significant efforts related to EM implementation, which could leverage similar efforts in other regions of the country.

While recognizing that costs are accounted for, and charged, differently across regions, we also note that the North Pacific is the only region in the country where industry still pays for the majority of observer coverage costs. In other regions observer program costs, both administrative costs and direct placement of observer costs, are largely borne by NOAA Fisheries operational budget, which has some flexibility in how it distributes operational funding to the various regional observer programs. We believe that it would be appropriate for either NMFS, or Congress if necessary, to provide the one-time funding in 2015 which will be necessary to bridge the gap between fees collected and estimated 2015 observer costs, as well as to provide the necessary support to realize implementation of EM in 2016.

Regarding our discussions on the MSA reauthorization process, we again complement you and your staff on the July 2014 revised draft bill, which was so responsive to many of the comments we submitted on an earlier draft. We also agree with your comments that any renewed efforts at MSA reauthorization, likely to occur in early 2015, do not 'start from scratch', but take full advantage of the input and progress accomplished thus far in 2014.

Again, thank you for your recent visit to our Council meeting and for your invitation to provide additional information on some of our priorities and associated funding issues.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, flowing style.

Dan Hull  
Chairman

# North Pacific Fishery Management Council

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Chris Oliver, Executive Director



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October 28, 2014

Mr. Russell Dunn  
National Marine Fisheries Service  
1315 East West Highway  
Silver Spring, MD 20910-3282

Mr. Russell Dunn:

I am writing on behalf of our Council to express our appreciation for the recent workshop held in Anchorage (and facilitated by Ms. Danielle Rioux) in conjunction with our October Council meeting, and to provide a few follow-up comments relative to development of the National Saltwater Recreational Fishing Policy. We hope that individual input received during the workshop was useful, and following the workshop, during our Council meeting, our Council expressed a few overarching comments I wish to convey.

First, the Council would like to reiterate our position that the Policy not in any way create a mandatory mechanism for revisiting existing allocations between commercial and recreational fisheries – while any Council may find reason to do so, such actions should be initiated by the responsible Council, based on the specific circumstances and characteristics of a particular fishery, and not be automatically required by NMFS policy. The Councils have discussed this issue in a broader context at many recent meetings of the Council Coordination Committee.

Secondly, the Council cautions against a national Policy which could inadvertently result in duplication of existing State level management initiatives, or existing management partnerships between NMFS, Council, and individual States, such as those that currently exist relative to management of halibut recreational fisheries off Alaska. Related to that point, we also caution against implementation of additional, potentially burdensome data collection requirements that could impact existing data collection efforts at the NMFS, State, or Commission levels. We recognize the dire need for additional data and information on many recreational fisheries around the country. We simply want to ensure that such efforts are directed at the specific fisheries in need of such data, and do not unnecessarily burden regions where data collection efforts are already addressing information gaps.

In closing, we appreciate the opportunity to provide feedback on this developing national Policy, and look forward to continued collaboration with the Councils in this process.

Sincerely,



Chris Oliver  
Executive Director

CC: Ms. Eileen Sobeck  
Dr. Jim Balsiger

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October 28, 2014

Senator Lesil McGuire, Co-Chair  
Representative Bob Herron, Co-Chair  
Alaska Arctic Policy Commission

Dear Chairman McGuire, and Chairman Herron,

At the recent meeting of the North Pacific Fishery Management Council (Council), Alaska Arctic Policy Commission (AAPC) members Stefanie Moreland, Stephanie Madsen, and Kris Norosz held a public listening session to inform Council meeting attendees of the AAPC's progress toward completing strategic recommendations for the State Legislature, and to encourage public participation in the process. I would like to thank you and AAPC members Moreland, Madsen, and Norosz for hosting that session during our Council meeting and hearing the comments of the Council attendees.

The waters of the Arctic, including the Bering Sea and Aleutian Islands, are the site of the most productive fisheries in the United States, annually providing over 2 million metric tons of sustainable seafood and billions of dollars of revenue. As such, the Council has a great and long-standing interest in the protection of the Arctic environment, sustainable development of Arctic resources, and economic sustainability of the people of the Arctic.

In 2009, the Council adopted the Fishery Management Plan for Fish Resources of the Arctic Management Area (Arctic FMP). Explicit in the Arctic FMP is the Council's Arctic Fishery Management Policy which states that the Council's policy is to proactively apply responsible fisheries management practices, based on sound scientific research and analysis, to ensure the sustainability of fishery resources, to prevent unregulated fishing, and to protect associated ecosystems for the benefit of current users and future generations. After careful analysis and discussion, the Council's decision in the Arctic FMP was to prohibit commercial harvests of all fish resources of the Arctic Management Area until sufficient information is available to support the sustainable management of a commercial fishery. This precautionary management decision was enacted proactively to ensure that a commercial fishery is not prosecuted in the Arctic until sufficient information exists to properly and sustainably manage such a fishery.

The Council continues to support ongoing work to understand the Arctic marine ecosystem, and to monitor and manage healthy marine fisheries using adaptive approaches that are inclusive and responsive to ecosystem considerations. Recently, the Council adopted a vision statement that articulates the Council's approach to adopting the ecosystem approach to fishery management. The Council envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats. Consistent with this vision statement, the Council is in the process of considering development of an overarching Fishery Ecosystem Plan for the Bering Sea.

Related to the AAPC's strategic goals, I would highlight the Western Alaska Community Development Quota (CDQ) Program which was created by the Council in 1992 to provide western Alaska communities the opportunity to participate in the commercial fisheries of the Bering Sea and Aleutian Islands that had been foreclosed to them because of the high capital investment required to enter the fishery. The CDQ Program allocates a percentage of all Bering Sea and Aleutian Island quotas for groundfish, prohibited species, halibut, and crab to eligible communities. The objectives of the CDQ Program are to provide eligible western Alaska villages with the opportunity to participate and invest in commercial fisheries in the Bering Sea and Aleutian Islands area, support economic development in western Alaska, alleviate poverty and provide economic and social benefits for the residents of western Alaska, and achieve sustainable and diversified local economies in western Alaska.

The Council is interested in the final report of the AAPC, and would like to request that the final report and recommendations be distributed to the Council in advance of the Council's February, 2015 meeting in Seattle, WA. Alternately, the Council requests that if the final report and recommendations are not printed by then, a representative of the AAPC present the recommendations from the AAPC that are relevant to federally managed fisheries or the marine environment, to the Council at the February, 2015 meeting.

Again, I would like to thank you and the members of the Alaska Arctic Policy Commission for the Council and the public the opportunity to provide input on the Commission's report. We look forward to seeing the final report from the AAPC, and continuing to work with the Alaska legislature and other Arctic stakeholders to ensure the sustainable development of Arctic marine resources and protection of the Arctic marine environment.

Sincerely,



Dan Hull  
Chairman

CC: Stefanie Moreland  
Stephanie Madsen  
Kris Norosz

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October 28, 2014

Dr. James Balsiger, Regional Administrator  
National Marine Fisheries Service Alaska Region  
PO Box 21668  
Juneau, AK 99802

Dear Dr. Balsiger,

I am writing today, first, to thank NMFS for hosting two workshops to allow the public the opportunity to present information and concerns regarding redefining critical habitat for the western DPS of Steller sea lions. The Council believes that the process to review and redefine critical habitat can be most effective when the public is offered the opportunity participate in the process, and we thank you and your staff for taking the first steps to allow that opportunity.

NMFS is currently preparing a number of analyses and reports that will inform the agency's determinations and the proposed rule. According to the timeline presented to the public at the workshops, the reports and proposed rule will be available for public review and comment at the same time. The Council believes that a modification to this timeline, and the order in which documents are prepared and released to the public, can greatly improve the public process. The Council contends that the public, and the agency, would best be served by allowing the public and the Council to have an opportunity to comment on these reports well in advance of the publication of the proposed rule (specifically including any independent reviews commissioned by NMFS). Public comment at an early stage will allow the agency to improve their reports, and thus the basis of the proposed rule by incorporating public comment and new information in the development of the proposed rule, rather than after the fact. Under the present scenario, the agency will have finished the proposed rule without this information.

The Council also encourages the agency to consider developing a NEPA analysis early in the process of defining critical habitat. Although the agency is not compelled to incorporate a NEPA analysis in the designation of critical habitat, there seems to be little harm that could come from an early analysis, and much to be gained. Based on responses to Council questions, it seems likely that a new consultation would be triggered as a result of critical habitat redesignation, and a NEPA analysis would, necessarily, be part of consideration of any new management measures. Further, there is some concern that any changes to critical habitat would automatically, or indirectly, result in effects to groundfish fisheries in the Aleutian Islands. As a specific example, the Atka mackerel harvest allowances are specific to inside and outside Steller sea lion critical habitat. As an illustration, if all of the viable fishing areas for Atka mackerel were included in a revision to critical habitat, then the fishery would automatically be impacted by a de facto reduction in the amount of Atka mackerel that would be available because the TAC designated for catch outside of critical habitat would effectively be stranded.

Although this is a unique scenario, it does highlight that changes to Steller sea lion critical habitat would likely result in effects to the groundfish fishery and the regulations governing those fisheries. Given this likelihood, and the 2012 decision of the U.S. District Court regarding NEPA implementation, the Council encourages the agency to consider preparing a NEPA analysis early in this process.

To summarize our comments, the Council makes the following recommendations to the agency for reviewing and redesignating critical habitat for the western DPS of Steller sea lions:

1. Develop draft reports and release them for public comment well in advance of preparation of the proposed rule. Incorporate the comments and revisions to the reports, as appropriate.
2. Conduct independent peer-review of these reports, using an open and transparent process similar to the CIE process on the 2010 groundfish management measures biological opinion, and allow for public review of those peer-reviews prior to publishing a proposed rule.
3. Incorporate the results of public comment and peer review into the proposed rule.
4. Consider early application of a NEPA analysis.

The Council looks forward to continuing to work with you and your staff during this process, and encourages you to engage the Council in this process during any appropriate steps.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull".

Dan Hull  
Chairman

Cc: Mr. Jon Kurland, ARA Protected Resources  
Dr. Lisa Rotterman, Steller sea lion coordinator  
Dr. Douglas DeMaster, Science and Research Director, AFSC  
Dr. James Balsiger, Regional Administrator

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October 28, 2014

Ms. Eileen Sobeck  
National Marine Fisheries Service  
1315 East West Highway  
Silver Spring, MD 20910-3282

Dear Ms. Sobeck:

I am writing to apprise you of recent discussions by the North Pacific Council regarding our recently restructured Observer Program, our efforts to get electronic monitoring (EM) into place, and associated funding needs. The Alaska Groundfish and Halibut Observer Program is critical to the continued stewardship of our Nation's largest and most valuable fisheries, as it allows the conservation and management objectives of both the Council and the agency to be supported by reliable and scientifically valid observer information. The restructuring of the program, which was implemented in 2013, was a significant step toward providing NMFS the flexibility to deploy observers in response to fishery management needs, and to reduce the bias inherent in the past program, to the benefit of the resulting data. It also continued longstanding industry contributions to funding this program by assessing a new fee (currently set at 1.25%) on landings to provide funding to support observer coverage. It is important, in the first years, to ensure continued public support for and confidence in the new program, to provide stability in coverage levels. However, in 2014 revenues from the landings fee are projected to be lower than expected, due to declining quotas of valuable species such as halibut. Additional funding of \$1.1 million is needed to offset the difference between anticipated and actual revenues collected through fee collection proceeds, in order to maintain the coverage levels needed to effectively manage the groundfish and halibut fisheries off Alaska. Adequate coverage levels are particularly critical at this time given the current low condition of halibut and Chinook stocks, which are taken incidentally and experience significant mortalities in the various fisheries.

The Council also highlights the importance of an effective program infrastructure in ensuring the success of the new program. While we understand and appreciate the significant NMFS funding devoted to the Alaska Fisheries Science Center to operate this program, it is also our understanding that in recent years permanent funding that supported staffing for effective and timely training and debriefing of observers, and quality control, was cut from the budget. We understand that last year the agency was able to fill this gap through approximately \$400,000 in temporary funding; however, we support a permanent restoration of this funding to the Alaska observer program operational budget. Lacking these funds, we would expect delays in debriefing and potential shortages in trained observers.

The Council is also proceeding with development of an ambitious electronic monitoring (EM) program to integrate with the Observer Program, and has set a target date of 2016 for pre-implementation of a functioning EM program on some portion of the small, fixed gear vessel fleet, in advance of a complete regulatory implementation. The Council understands this to be an ambitious goal, but intends to work towards having EM operational in 2016, focused initially on the vessels for which accommodating an observer onboard is physically problematic. In line with this goal, the Council is working on a

cooperative research program in 2015 for testing the technological and operational aspects of implementing EM to provide catch estimation in the fixed gear, small vessel fleet. We understand that there may be internal funding available for the development of EM programs in FY 2015, and we hope that the Alaska Region and Alaska Fisheries Science Center requests will be given careful consideration in the allocation of these funds, as agency funding to support EM infrastructure development is essential to support our EM goals. We do not at this time have a specific funding request, as the Council's EM Workgroup is meeting in November to discuss the budget for the 2015 cooperative research. We can update you in early December about specific needs to fund our EM work next year.

In closing, we urge you to support the allocation of additional funding for observer coverage (\$1.1M), observer program infrastructure (\$.4M), and for careful consideration of Alaskan EM funding proposals in 2015. On behalf of the North Pacific Council, thank you for considering this request.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, flowing style.

Dan Hull  
Chairman

CC: Dr. Jim Balsiger  
Dr. Doug DeMaster  
Mr. Sam Rauch  
Mr. Paul Doremus  
Mr. Martin Loefflad

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October 24, 2014

Mr. Paul Ryall  
Chair, International Pacific Halibut Commission  
2320 W. Commodore Way, Suite 300  
Seattle, WA 98199-1287

Dear Mr. Ryall:

At our recent October meeting, the Council discussed your September letter requesting a meeting between Council and Commission members in conjunction with our December Council meeting. Part of your rationale for a meeting in December was to allow for discussion of a coordinated management approach, and the total mortality accounting framework, prior to the Council's deliberations on our Bering Sea/Aleutian Islands (BS/AI) halibut PSC reduction package. Recognizing your desire for a discussion prior to the Council's initial review of that analysis, and the Council's desire to have as much information on the table as possible for that discussion, we propose a joint meeting with the Commissioners in conjunction with our February 2015 meeting in Seattle.

We believe that such timing makes the most sense for the following reasons: (1) it will give us the benefit of the Commission's decisions at your January 2015 annual meeting with regard to the total mortality accounting framework, or other relevant actions by the Commission; (2) it will allow the Council to have its Scientific and Statistical Committee (SSC) review the total mortality accounting framework paper prepared by IPHC staff, and the benefit of the SSC review to inform our discussions; (3) we will have full catch, discard, and halibut bycatch information for the 2014 halibut and groundfish fisheries at that time; and, (4) we can schedule our joint meeting early in the Council's meeting agenda so that our discussions occur prior to the Council's review of the BS/AI halibut PSC package later that week.

I propose that we allow our respective Executive Director's to plan for such a joint meeting in February, allowing for a half day of meeting time, likely to occur on the afternoon of Thursday, February 5. You and I, as respective Chairs, can be involved in structuring the agenda for this meeting to the extent necessary, noting the Council's desire to have a clear, mutual understanding of the context, expectations, and potential outcomes of a joint meeting.

Mr. Paul Ryall  
October 24, 2014  
Page 2

We appreciate the Commission's desire for this meeting with the Council and look forward to our discussions regarding a more coordinated, comprehensive approach to halibut management.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, flowing style.

Dan Hull  
Chairman

CC: Council members  
Dr. Bruce Leaman

# North Pacific Fishery Management Council

Dan Hull, Chairman  
Chris Oliver, Executive Director



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October 23, 2014

Dr Doug DeMaster, Science and Research Director  
AFSC/TSMRI  
17109 Point Lena Loop Road  
Juneau, AK 99801

Dear Dr. DeMaster:

At the October Council meeting, the Council reviewed the 2015 observer annual deployment plan (ADP). The Council supports the overall provisions for observer coverage described in the ADP, including using the trip selection pool to assign vessels, but using two strata that separate small and large vessels. The Council approves selection probabilities for the small vessel trip-selection stratum at 12%, and for the large vessel trip-selection stratum at 24%.

The Council supports only allowing conditional releases in 2015 in the small vessel trip selection stratum. The Council agrees with the agency's recommendation that conditional releases be granted to vessels that do not have sufficient life raft capacity to accommodate an observer. However, the Council additionally recommends that a conditional release should also be granted for the third consecutive trip for which a vessel has been selected for observer coverage. While the Council agreed with the agency that granting conditional releases for vessels with insufficient bunk space to accommodate an observer should no longer be allowed, the Council included the additional conditional release provision in order to mitigate the cumulative burden of a bunk space-limited small vessel being selected for multiple trips in a row. The Council also requests that the 2014 Observer Annual Report, in June 2015, include information to evaluate a sunset provision for the conditional release for life raft capacity, including the potential for bias, costs to an operator of upgrading to a larger liferaft, and enforcement disincentives from downgrading one's liferaft.

As in 2014, the Council supports trawl catcher vessels fishing for Pacific cod in the BSAI being given the opportunity to opt-in to the full coverage pool by arrangement with the agency. The Council also supports vessels that participate in EM cooperative research being assigned to the no selection pool while participating in such research.

The Council also discussed the possibility of defining different strata for deployment, for example, based on gear type, or on fisheries subject to prohibited species cap limits. While the Council ultimately was persuaded that they do not as yet have sufficient information to fully understand the tradeoffs of such a deployment strategy, the Council requests that the 2014 Observer Annual Report provide an evaluation of alternative methods for defining strata.

Another issue the Council discussed was the current shortage of fixed gear Lead Level 2 (LL2) observers for deployment on catcher processor hook-and-line vessels, and that successful resolution of this issue in the near term will require a cooperative effort from NMFS, the Freezer Longline Coalition (FLC), and the observer providers. The Council has strongly encouraged the FLC and observer providers to meet and collectively work together to resolve this issue, and requests that a representative from the NMFS Observer Program should be in attendance at the work session in order to assist the parties in arriving at solutions. The Council also recommends that NMFS investigate training and deployment requirements and non-regulatory changes that may assist in increasing the pool of available fixed gear LL2 qualified observers, and determine what changes are required to be able to deploy trawl LL2 observers on fixed gear vessels, in the event a fixed gear-trained LL2 observer is not available.

Finally, the Council understands that the agency is in the process of completing a Regional Implementation Plan for Electronic Technologies by the end of the year. The Council requests that, depending on the requisite timing for submitting the plan, this should either be presented for review to the Council, and/or to the Council's Electronic Monitoring Workgroup.

We look forward to receiving updates on these issues at our future meetings. You may contact Mr. Chris Oliver or Ms. Diana Evans if there are any questions about these requests.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, flowing style.

Dan Hull  
Chairman

Cc: Martin Loefflad  
Dr. Jim Balsiger

October 7, 2014

North Pacific Fishery Management Council  
605 West 4th, Suite 306  
Anchorage, Alaska 99501-2252

**RECEIVED**  
OCT 15 2014

Re: Protect the Bering Sea Canyons

To Whom It May Concern:

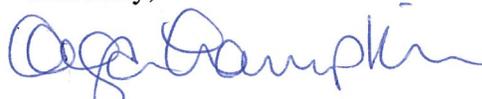
With this letter, I join with hundreds of thousands of individuals who have, over the course of more than a decade, implored you to protect the essential fish habitat in the Bering Sea Canyons.

Last year the Council received a report on the Bering Sea Canyons from NOAA scientists validating the presence of vulnerable coral and sponge habitat in Zhemchug and Pribilof Canyons. The report identifies the shelf break and associated canyons - the "Green Belt" - as containing a large portion of the coral habitat that exists in the entire Bering Sea.

I understand that the Council declared the Bering Sea canyons a high priority research item in 2006, and I appreciate the effort finally under way by NOAA scientists to increase the research record on the canyons and shelf-break, with field work scheduled in the summer of 2014. There will always be more to learn, and policy decisions will, as they always have, benefit from the best available science at the time. Enough is known now, though, to act to protect these crucial habitat areas.

Until the process to implement management measures for the canyons is completed important areas that have been identified remain vulnerable, putting at risk long-lived species that provide essential habitat for commercially important fish and other marine life in this complex ecosystem. I encourage the Council to make needed progress at this Council meeting by moving to develop alternatives immediately, considering all stakeholder input, to best protect this habitat while maintaining fishing opportunities that ultimately support productive fisheries.

Sincerely,



Olga Lampkin  
9314 Alki Court  
Bakersfield, CA 93312