



Lieutenant Governor Byron Mallott
STATE OF ALASKA

June 16, 2015

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

RE: Request for the Secretary of Commerce to implement emergency action to reopen the 2015 Gulf of Alaska non-pollock, non-rockfish program catcher vessel fishery.

Dear Ms. Sobeck:

I write you concerning bycatch issues of Chinook salmon in the Gulf of Alaska (GOA) non-pollock, non-rockfish catcher vessel (CV) fishery.

Regulations establish a Chinook salmon prohibited species catch (PSC) limit of 32,500 Chinook salmon in the Central and Western GOA trawl fisheries. Chinook salmon PSC limits are managed under two separate programs; one that apportions 25,000 Chinook salmon to the catcher vessels in the pollock trawl fishery (Amendment 93 to the GOA FMP), and another that apportions 7,500 Chinook to three sectors in the non-pollock trawl fisheries; the catcher/processor (3,600), Rockfish Program catcher vessel (1,200), and the non-Rockfish Program catcher vessel (2,700) sectors (Amendment 97 to the GOA FMP).

On May 3rd, the fleet hit the maximum bycatch allowed under Amendment 97 and the National Marine Fisheries Service (NMFS) closed the fishery. The impact of this early closure is estimated to be foregone harvest of several thousand metric tons of Pacific cod and flatfish, worth millions of dollars in wholesale revenues.

This closure is having a significant negative economic effect on the community of Kodiak, home to the only non-pollock CV fleet that operates in the GOA after May. Kodiak depends heavily on the CV fishery to fill the gaps created by other seasonal fisheries such as salmon, pot gear and herring fisheries. The trawl CV fishery ensures that Kodiak is able to maintain a year-round resident processing workforce and provides significant indirect business in the form of retail sales, utility usage, and maintenance and harbor facility utilization.

On June 9, the North Pacific Fishery Management Council (NPFMC) voted unanimously to request the Secretary of Commerce promulgate emergency regulations under the authority of Section 305(c)

Ms. Eileen Sobeck
June 16, 2015
Page 2

of the Magnuson-Stevens Act to allocate an additional 1,600 Chinook salmon to the PSC limit established for the non-pollock/non-rockfish catcher vessel sector for the remainder of 2015. The NPFMC cited recent and unforeseen events to support such a request, including the increase in PSC use in this sector relative to the rates examined when the initial PSC limit of 7,500 Chinook salmon was approved by the NPFMC (June 2013) and changes to the observer program beginning in 2013.

I understand the NPFMC also voted to initiate an analysis that may relieve some of the current restrictions, by allowing in season reallocation of Chinook salmon PSC between the pollock and non-pollock fisheries without exceeding the overall 32,500 Chinook salmon PSC limit. This action requires an analysis and regulatory amendment, however, and cannot be in place this year,

I kindly request that the Secretary of Commerce consider emergency action allocating additional Chinook salmon for the 2015 non-pollock, non-rockfish GOA trawl fishery.

In closing, I want to emphasize the State of Alaska does not wish to see the overall Chinook maximum bycatch limit in the Gulf of Alaska exceeded.

Thank you for your consideration of this issue, please contact my office at 907-465-3520 if I can assist further in this matter.

Sincerely,



Byron Mallott
Lieutenant Governor

cc: The Honorable Bill Walker, Governor, State of Alaska
The Honorable Sam Cotten, Commissioner, Department of Fish & Game