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encourages advances in fishing gear and fishing techniques to reduce bycatch, which is a shared goal between NMFS, NPFMC, and Oceana.

In addition, we recommend increasing observer coverage to 100% for the trawl sectors. More coverage yields more precise and accurate estimates of bycatch. Further, 100% observer coverage ensures that extrapolation of high salmon bycatch rates from poorly performing vessels on the rest of the fleet is minimized. The proposed observer coverage for the non-Rockfish Program CV was improved from 24% to 27%, however that sector is at greater risk of being closed than those sectors with 100% coverage³. This difference in coverage puts more strain on the community of Kodiak processors who rely on offloads from non-Rockfish Program CVs, but this problem can be solved with increased observer coverage.

Thank you again for your work with this issue. By reducing and minimizing wasteful bycatch, more salmon will survive to spawn in the rivers and streams of Alaska, the Pacific Northwest, and Canada. We will continue to communicate and work with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Warrenchuk". The signature is stylized and cursive.

Jon Warrenchuk
Senior Scientist and Campaign Manager
Oceana

¹Sagalkin, N. 2014. Kodiak Management Area 2014 Commercial Salmon Fishery Summary. Alaska Department of Fish and Game Memorandum, December 3, 2014.

² <http://www.adn.com/article/20150407/two-premier-kodiak-king-salmon-rivers-shuttered-chinook-anglers> accessed December 1, 2015.

³ NMFS. 2015. 2016 annual deployment plan for observers in the groundfish and halibut fisheries off Alaska. NOAA, Juneau.