



Native Village of Marshall  
Marshall Traditional Council  
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September 25, 2024

North Pacific Fishery Management  
12909 SW 68<sup>th</sup> PKWY, STE 430  
Tigard, OR 97223

Re: Pelagic Trawl

Dear North Pacific Fishery Management Council Members:

I am writing to you regarding agenda item C6: Pelagic trawl gear definition.

The council must clearly define pelagic to mean no portion of the fishing gear touching the seafloor at any point. Midwater—or pelagic—trawl is by definition fishing in the middle of the water column with minimal or no interaction with the seafloor habitat. However, the National Marine Fisheries Service now estimates bottom contact up to 60% of the time for small pelagic trawl vessels and up to 100% for factory catcher/processors. The effects of trawl nets hitting the ocean floor are of great concern since these massive, and extremely heavy nets pulverize crabs in their most vulnerable state, decimate corals, and rake through a wide variety of benthic habitats.

Failure to clarify the definition of pelagic trawl would be a grave public disservice, leading to significant erosion of public trust in the Council while continuing to expose the Bering Sea and Gulf and sea floors to unacceptable levels of environmental damage.

Please take clear and decisive action now. Thank you.

Sincerely,  
Native Village of Marshall  
Marshall Traditional Council

  
Nick P. Andrew Jr  
President

Cc: file