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Bellingham Cold Storage Company

February 11, 2009

Robert D. Mecum
Acting Administrator, Alaska Region
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668
Sent via email to: salmonbycatcheis@noaa.gov

Re: Draft Environmental Impact Statement on Chinook salmon by-catch limits in the Bering Sea pollock fishery (the DEIS)

Dear Mr. Mecum:

I am writing on behalf of Bellingham Cold Storage to comment on the above referenced DEIS and the analysis contained therein. Our company supplies several hundreds of thousands of dollars worth of freezing, storage and handling services for several of the companies that participate in the Bering Sea Pollock fishery. We employ approximately 180 employees here in Washington State.

The DEIS describes a number of alternative management measures designed to limit or control the amount of Chinook salmon that Bering Sea fishermen can take as by-catch in their pollock fishing operations. Once those limits or "caps" are reached, the fishermen must either stop fishing altogether for the remainder of the fishing year or at least for the remainder of the fishing season in which they've been operating.

Depending on the option chosen, the analysis suggests that such caps might result in foregone pollock harvests worth hundreds of millions of dollars to the pollock fishing industry each year. Such losses would have significant impacts in terms of lost revenues, jobs and other economic activity-- not only for the fishing companies themselves, but for companies such as ours that provide goods and services to the pollock industry.

Unfortunately, the analysis does not attempt to describe, much less quantify those impacts on companies such as Bellingham Cold Storage. Without a full understanding of the potential costs that such measures might have on companies such as ours, the North Pacific Council will not have the information it needs to make an informed decision as to what the appropriate balance should be between the benefits that the proposed caps might provide to salmon fishermen on the one hand and the costs to pollock fishermen and their related support industries on the other. For these reasons, it is imperative that the analysis be expanded to consider both the direct and indirect costs associated with each of the proposed alternatives before the Council takes final action on the proposed by-catch amendment.

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Bellingham Cold Storage Company

If you have any questions about our company, the goods and services it provides to the Bering Sea pollock fleet, and/or the possible impacts on our business that would flow from premature closures of the fishery, please give me a call.

Sincerely,

Douglas G. Thomas
President & CEO
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