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Robert D. Mecum
Acting Administrator, Alaska Region
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

Date February 12, 2009

sent via email to:
salmonbycatcheis@noaa.gov

Re: Draft Environmental Impact Statement on
Chinook Salmon Bycatch Limits in the Bering Sea
Pollock Fishery (the DEIS)

Dear Mr. Mecum:

I am writing on behalf of Cityice Cold Storage to comment on the above referenced DEIS and the analysis contained therein. Our company supplies *cold storage and Logistics services* to companies and vessels engaged in the Bering Sea pollock fishery. We have 75 permanent employees here in Seattle. The Bering Sea pollock fishery produces product that accounts for more than 50% of our total revenue. The continued health of this fishery is vital to our long term viability.

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 bycatch 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.

It is our understanding that the analysis being done does not attempt to describe, much less quantify those impacts on companies such as CityIce 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, we ask 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 bycatch amendment.

It is our hope that the council will find a reasonable and balanced solution to both protecting the salmon runs and allowing the Pollack fishery to be conducted in a sustainable and economic way.

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,

Kim Suelzle
President
CityIce Cold Storage Company

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