

*Handout by
Theresa Petersen*

C2

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Re: Agenda item C-2 Gulf of Alaska Trawl Bycatch Management

Dear Chairman Olson and Council Members,

My name is Kip Thomet . I have had the pleasure of calling Kodiak home for over 30 years now. In those 30 plus years, my wife Leigh and I have participated in just about every fishery Kodiak has to offer. We both feel strongly about maintaining the health and vitality our communities economy and structure. We also feel a responsibility to give back to the Kodiak community and so are active on many fishery related boards, committees and associations.

The emerging Gulf of Alaska Trawl Bycatch Management Program will have a profound impact on Gulf of Alaska fishery dependent communities. While the current program framework includes important components such as consolidation limits, 100 percent observer coverage and regionalized delivery requirements, the proposed framework fails to fully address one of the most acute impacts of fisheries rationalization: the out-migration of fishing rights and wealth from our coastal communities.

I am writing in support of Council action to protect fishing communities through inclusion of a Community Fishing Association in the Trawl Bycatch Management Program. A Community Fishing Association is a flexible, effective management tool that will help to ensure that the wealth of our fisheries doesn't migrate away from our communities. A Community Fishing Association can also achieve community goals including providing opportunity for new entrants and equitable crew compensation. Finally, anchoring quota in the community in perpetuity through a Community Fishing Association ensures access to the resource for future generations. I strongly support a direct allocation to a Community Fishing Association and ask the Council to include this as an option for further consideration in the next analysis.

Thank you for your time and attention to this critical issue.

Sincerely, Kip Thomet

Susan Robinson
C2

Examples of CP Trawl GOA Management measures for PSC

Possible performance standards and incentives

- CP co-op sets guidelines for PSC rates based on actual fishing conditions, past history, and achievability by target fishery (*see halibut rate and mortality Tables in Chapter 4 from Amendment 95 EA for example*)
- Incentive measures
- CPs receive pro-rata share of halibut and salmon, under co-op mgmt., based on agreed upon formula
- Cost recovery payments tied to PSC usage (inverse relationship)

Cooperative communication

- Monitor PSC by vessel, fishery, time and area
- Daily call-in to discuss PSC, ongoing communication on grounds
- Information sharing between sectors, coops
- Seastate program monitors vessels' fishing locations and bycatch data, and disseminates daily

Reporting to the Council

- Annual Report to Council, detailing bycatch avoidance measures and progress
- Cooperatives to inform Council on measures taken to date and under future consideration or development, ie salmon excluders, BS and GOA halibut excluder, cameras on nets

PSC monitoring

Chinook:

- 200% observer coverage
- Video monitoring in factory
- whole haul instead of basket sampling
- Seashare program participation
- genetic sampling for Auke Bay lab
- Cameras on headrope and/or intermediate to see fish behavior, gear and excluder functionality
- NMFS cooperative research program on salmon excluder panels
- Industry experimentation with salmon excluders

Halibut:

- 200% observer coverage
- Basket sampling
- Ongoing use and refinement of excluder devices and gear modification, EM
- EFP for Deck sorting to reduce mortality
- Cameras on headrope and/or intermediate to see fish behavior, gear and excluder functionality
- Test tows
- Spread out effort (avoid chumming in halibut)

April 2014, Council handout
Fishermen's Finest, Inc.



Alaska Whitefish Trawlers Association

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April 9/2014

Agenda Item C-2 GOA Bycatch

AWTA comments and recommendations on issues of particular concern

Qualifying years for target and secondary species QS/History (Industry Workgroup Framework 3.2.1)

AWTA supports the inclusion of all four options for consideration for qualifying years.

Option 1: 2010 - 2012

Option 2: 2003 - 2008

Option 3: 2008 - 2012

Option 4: 2003 - 2012 Drop 0, 1, 2

Analyzing all four options gives harvesters more clarity in the impacts of the different suites of years. AWTA recommended the inclusion of the following options for these reasons:

Option 2 - This time clip advantages GOA dependent non-AFA vessels.

Option 3 - This time clip advantages AFA vessels.

Option 4 - This time clip is a negotiated compromise between GOA dependent non-AFA vessels and AFA vessels since it lets all vessels choose the best years for their individual operation.

Allocation of Target species

Allocate Pollock and Pacific Cod (*Council motion 6a*)

We recommend additional target allocations of species that may be constraining.

(Industry Workgroup Framework 2.2.2- see note at top of page 7. Some species may be split between the off shore and inshore sectors but not be allocated as part of the inshore program.)

Apportionment of PSC to Cooperatives (Council motion 6b)

Apportion halibut PSC and Chinook PSC limits to each cooperative on a pro-rata basis relative to target of GOA trawl vessels in the cooperatives

We recommend apportioning additional halibut PSC and Chinook PSC to each cooperative based on the flatfish history of GOA trawl vessels in the cooperatives even though the flatfish itself may not be allocated.

(Industry Workgroup Framework 3.2.2 Chinook Options 2 & 3 Halibut Options 2 & 3)

Duration of shares (Council motion 1b)

We do not support this element which creates regulations that could result in the loss of up to 25% of target species every 3 – 10 years based on PSC performance. Each cooperative agreement should include mechanisms for PSC management and reductions.
(Industry Workgroup Framework 7.3 Cooperative Agreements)

Required signature on cooperative contracts (Council motion 6e)

We do not support the requirement that “all” harvesters in the cooperative and the processor would have to sign the cooperative contract. This would enable any one harvester to hold the entire cooperative hostage by refusing to sign the contract unless their individual concerns were met. We support having less than 100% requirement on cooperative agreement.
Industry Workgroup Framework 3.4.1

Fishery dependent community stability

Consolidation limits (Council motion 7a)

We support harvester ownership and use caps. *(Industry Workgroup Framework 4.2)*

We support Processor caps. *(Industry Workgroup Framework 4.1)*

Additionally, we support Inshore Cooperative Caps (Industry Workgroup Framework 4.1)

Regionalization (Council motion 7b)

We support regionalization of target species based on where the deliveries were landed.

We support the Option that fish historically landed in Kodiak would have a port landing requirement to Kodiak.

Community Fishing Association

We do not support the creation of a Community Fishing Association