



March 10, 2017

Mr. Dan Hull, Chairman
 North Pacific Fishery Management Council
 605 W. 4th Ave., Suite 306
 Anchorage, AK 99501

Re: April 2017 Agenda Item E1, Staff Tasking

Dear Chairman Hull and Members of the NPFMC,

UCB requests that the North Pacific Fishery Management Council (NPFMC) establish a Control Date for the harvesting of Pacific Cod in the Eastern Bering Sea Trawl Catcher Vessel fishery. Establishing a Control Date for this fishery will send a signal to the Catcher Vessel trawl fleet that the NPFMC realizes that there is a problem with too much effort entering this fishery. This action sends a signal to the trawl industry that any vessel that has not participated in this fishery by the control date may not be able to participate in the future. In addition, this action sends a signal to the industry that catch of P. Cod after the Control Date might not be considered or used in the determination of catch history if the Council pursues some form of a 'Catch Share' program in the future. We ask that the date of the Control Date be today, April 10, 2017.

The reason we ask the Council for this action is that the Bering Sea P. Cod trawl fishery, one of the last remaining Open Access fisheries in the BSAI, is experiencing a 'Race for Fish'. More and more effort is entering the EBS trawl CV P. cod fishery and the increase in recent participation is having a significant negative impact on the historic participants of this fishery that are dependent on this fishery.

I subscribe to Alaska Marine Exchange's AIS vessel tracking service and was amazed at watching the number of vessels on the Unimak P. cod fishing grounds this past A season. On average there were over 45 vessels on the cod tow every morning of the season. I believe there were 6 or 7 new vessels that entered the fishery in 2017 that were not there in 2016. The historic average of vessels participating in this fishery has been somewhere in the range of 35 to 45 vessels within the past 10 years. The problem here is that if this trend continues, there might be a 20 to 30% increase in the number of trawl vessels entering the fishery in the next few years.

The 2017 EBS cod trawl A season fishery closed on February 23rd, a full two weeks earlier than when it closed in 2016 (March 9). With the fishery start date of January 20th, this fishery lasted just a month. The fleet actually went over the A season allocation of 34,962 mt by 2,189 mt due to the race for fish. So it appears NMFS is having problems managing the fishery too.

Had the 5,000 mt set aside for the AI Islands trawl fishery been in place, the EBS fishery would have lasted about 3 weeks, or closed in mid-February.

We are currently experiencing very high EBS P. Cod TACs. I suspect the TAC will trend downward at some time in the near future time and this will exacerbate this race for fish problem.

What we request is that the Council freeze the footprint of this fishery at this time, take a pause, and consider actions that might provide solutions to this effort increase problem. If you do not do this now, the problem will only get worse. Your action will send a strong signal to vessel owners who want to speculate on this fishery.

A Control Date action, without any follow-up action by the NPFMC really does nothing. Thus, along with the establishment of a Control Date at this meeting, we request the Council direct staff to initiate a discussion paper that examines the trends in effort and the problems the historic and dependant participants are experiencing.

Regarding possible solutions, this could range from at a minimum a simple LLP recency action that eliminates the truly latent LLP permits with EBS endorsements, to an analysis of a Catch Share program.

Thank you very much for your consideration of our request at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent C. Paine". The signature is written in a cursive, flowing style.

Brent C. Paine

Julie
Bonney
E1

Alaska Groundfish Data Bank

Staff Tasking – April 10, 2017

The Gulf of Alaska (GOA) catcher vessel non-pollock groundfish trawl fisheries continue to be negatively impacted by the Chinook salmon Prohibited Species Catch (PSC) limits. Increased observer data since 2013 for trawl vessels less than 60 feet indicate higher incidental take of Chinook salmon in these fisheries compared to the historical time period that was analyzed to select the caps; consistent genetic information shows that the vast majority of the Chinook salmon bycatch are from areas of high hatchery production; and, finally, PSC limits are managed on a sector-wide basis and there is no management program in place to mitigate the impacts of a derby-style race for fish. The existing PSC caps may not be practicable based on the current conditions in the fishery and may not appropriately balance National Standard 1 and National Standard 9.

Increasing the Chinook salmon bycatch caps slightly may increase the likelihood that groundfish resources are more fully harvested, and minimize the adverse socioeconomic impacts of fishery closures on harvesters, processors, and communities, yet not exceed the overall 40,000 ESA threshold for re-consultation established for Chinook salmon bycatch in the Gulf of Alaska.

Alternative 1. No action alternative (status quo)

Alternative 2. Revise the GOA trawl catcher vessel non-pollock/non-rockfish program Chinook salmon PSC cap (2,700 fish) to:

Option 1: 3,700

Option 2: 4,700

Option 3: 5,700

Alternative 3. Revise the GOA trawl catcher vessel Rockfish Program Chinook salmon PSC cap (1,200 fish) to:

Option 1: 1,500

Option 2: 1,800

Option 3: 2,100

Under both Alternatives 2 and 3, existing reallocation procedures from the Rockfish Program catcher vessel sector to the non-Rockfish Program catcher vessel sector would not be modified.

Julie
Bonney
E1

Alaska Groundfish Data Bank

Staff Tasking

Chinook hatchery releases

Thousands of fish	2010	2011	2012	2013	2014	2015	Avg
Canada	45,472	40,358	43,087	39,172	35,946	35,518	39,925
Russia	880	815	911	910	999	894	901
Alaska	11,086	8,571	9,518	9,012	9,349	8,959	9,416
Washington	118,943	117,607	116,709	113,490	112,115	103,810	113,779
Oregon	33,187	29,753	31,650	32,110	31,075	28,501	31,046
California	41,541	47,081	40,800	41,728	43,226	32,444	41,137
Idaho	14,492	14,969	13,768	14,120	15,936	14,147	14,572
Total	265,602	259,154	256,443	250,541	248,646	224,273	250,776

North Pacific Anadromous Fish Commission (NPAFC). 2016. NPAFC Pacific salmonid hatchery release statistics (updated 20 July 2016). North Pacific Anadromous Fish Commission, Vancouver. Accessed Month, Year. Available: www.npafc.org

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: E-1 STAFF TASKING

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:	
1	Steve Minor	QSL LLC	3
2	Brent Payne HO	UCB	6
3	JONATHAN THORPE	Blue Anchor Fisheries	3
4	Lauren Divine	Aleut Community of St. Paul Island	6
5	CHRIS WOODLEY	GFF	6
6	Jody Cook	SELF	3
7	Mark Upton	US Seafoods	3
8	Heather McLarty	CBSEA	6
9	Mike Symonster/Annika	FIFE-	6
10	Julie Penney	ARB	6
11	Mat Haegy	self	
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.