

North Pacific Fishery Management Council
Agenda Item C-3
Pollock ICA/IPA Reports

3/16/2017

Mr Chairman and Members of the Council,

My name is Jody Cook. I am part owner and operator of the 58' FV Cape Reliant. I have been involved with trawling out of Kodiak, King Cove, and Sand Point, for 30 years.

I began writing this letter as I was sitting in King Cove on a voluntary stand down, by the Western Gulf, area 610 fishermen. On February 21, we would have been shut down if we would not have stopped fishing. We were informed through the Dutch Harbor NOAA office that 3 salmon that had been taken in basket samples had been extrapolated out and resulted in a hi rate. This had been applied to a significant amount of fish due to delayed tender data and of course, the continued "race for fish". By the time we were informed of it, we had already had nearly 2000 salmon out of our 3000 allowed in our cap accounted against us. Fortunately there were still observers out on boats in tender areas, at the time. When their data was sent in and calculated it brought the numbers down significantly. We decided to stand down 5 days until the rate expired, to avoid any more imaginary salmon being added.

So... there are two points to this letter:

One,... the abundance of healthy hatchery stocks in the by catch numbers are resulting in trawl fishery closers. These closures have no significant connection with the stressed gulf stocks that these chinook caps were set to protect.

Two,.. The western gulf non-pollock trawl fishery is too small for the extrapolated basket samples to be accurate. There is not enough samples taken to create a realistic number for managing by catch levels during the fishing season. The basket samples only work with a large amount of samples accumulated, to provide a more accurate average. The fewer samples, the greater chance of misrepresentation.

This small cap was set based on historic catch of salmon. There had actually been very little or no observer coverage to base an accurate historical catch rate on, at the time. The partial coverage had only recently been employed, so any history was very limited.

I appeal to the council to pursue a re- evaluation of the Gulf wide salmon cap for the Western and Central Gulf non-pollock trawl fisheries. I would ask that the council follow through with direction from the Commissioner, to evaluate the level of hatchery stocks involved in the by catch. That, as long as these stocks that make up a significant part of the bycatch are healthy, that the cap be raised. I believe that the potential for unrestricted hatchery releases to impact bycatch towards higher numbers and more closers, is imminent.

I also appeal to the council and ODDS development team,.. to make some adjustments to the basket sample process. Possibly allow or require the observer to count all the salmon in a set of cod, that is being bled on deck. They could still do the basket sample, for halibut and age and species composition. But, because salmon is a critical aspect from all perspectives, do a whole set count for salmon. All cod are normally bled and put in the fish hold individually. There

the set was being bled.. It takes about 20 minutes for a 5-10,000lbs. It takes about an hour for 15- 30,000lbs, depending on crew size, the size of the cod, and how clean the tow is. Depending on how big the deck is and how it is configured, the observer could decide if they could watch and do basket samples at the same time. Or, they could just fill their baskets and set them aside until they have watched the set be bled.

In any case,.. I believe the caps are way too low. There was not enough historical data for caps to be based on historical catch of salmon in the Western Gulf non-pollock trawl fishery. I was present at many of the meetings and testified against these caps. There wasn't a lot of opposition because frankly, we hadn't had that many salmon in the cod fishery. But,.. as I had testified,.. conditions could change. And they have. It could be warmer water,.. but I think it has more to do with an increase in hatchery fish abundance in general. I believe these stocks are very healthy and that a much higher cap would not be a threat to these stocks, and especially not a threat to the gulf stocks that are almost non-existent in our bycatch genetics.

Again, I appeal to the council to re-visit this salmon cap for the non-pollock trawl gulf fishery. That it would actually be based on good and current science instead of the zeal of the anti-trawl lobby that pushed it through the council process. There was no basis beyond the non-existent historical number. The justification was that it was just dangerous to not have a cap. There was never any evidence to show good or bad salmon numbers..

I believe that it is important to always strive to reduce bycatch. With the Commissioners motion and the council's vote to stop progress on the only bycatch reduction plan that made sense, it has been very frustrating for Fishers and Industry to address this issue. I know the circumstances and that the council was basically forced into a corner with the Commissioners power vote. And with that vote,.. we are still faced with the race for fish. We have taken measures to reduce bycatch with halibut excluders and salmon excluders. We have put bigger mesh in our nets to keep from killing smaller cod and smaller fish in general. But,.. the incentive to avoid areas of higher bycatch when it is the best fishing for target fish, is very hard when someone else is loading up in that area. The quota is not so large that you can sit to the side, and still make a season. Now,.. with these high counts of hatchery fish in our bycatch numbers, we are facing closures. We were able to get a full compliance for our first stand down on February 21st. But later, on March 1st, when we were trying to avoid a premature season closure, 3 larger boats from outside the area, would not wait... So,.. these little cooperative efforts are not something we can count on,..

Thankyou, as always for the opportunity to weigh in with my perspective and appeals... I appreciate those of you who truly try to serve the public's best interests..

Sincerely,

Jody R Cook