



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Agenda Items D1-D3

1 message

Mike Galligan <mikegalligan@icloud.com>
To: npfmc.comments@noaa.gov

Wed, Nov 29, 2017 at 3:20 PM

Dear Council,

My name is Michael H Galligan. I have been on the back deck, as crew, of a top 5% 58' trawl/Seine vessel in the Western Gulf Cod/Pollock fisheries for over the past 29 years. I have also, at times, filled in as an interim operator and am now in the process of purchasing the vessel I have been on with two other crew members who have also been on this boat for the past ten years.

Being on the back deck of one of these "58's" has given me a "boots on the deck" first hand perspective of the evolutionary changes of these Fisheries over the past 29 years. You will find, in many ways, my opinion may differ to that of many owner/operators based on my "boots on the deck" perspective -vs- the "bottom line" perspective of an owner on many of these issues from bycatch to the observer program and all points in between.

I'll keep this short and get to the topics at hand, 1) changing the WGOA Trawl Cod start date, 2) adjusting Pollock quotas of A-D and 3) Trip Limits.

1) COD TRAWL START DATE

I see no reason to change the historic start date of Western GOA Trawl Cod from Jan 20 to Feb 15. I believe the motivation of such a change, by many, is hiding behind making it an issue of bycatch -vs- their attempt to limit the Trawl catch while they "chose" to harvest Cod using Pots or, as is often the case, "chose" to stand down because they are simply not as competitive. This is then more of an attempt in the reallocation of quota than it is a bycatch issue.

To survive in these Fisheries today, WE need to have the ability to simply "adapt to changes in the environment" I have witnessed, first hand, the positive results of using excluders both for immature halibut/assorted flats and salmon in the midwater fishery. And, in worse cases, even moving away from areas of high abundance of bycatch. Bottom line. Excluders work. Frankly, I'm surprised they are not a requirement, IF...this is really such an issue...why are they NOT is the more pertinent question? This is more of a move to limit the competitiveness of the top producing trawlers...who have successfully adapted their abilities to avoid unnecessary bycatch ...by those that fail to take those same proven steps and chose to either fish Cod with Pots or simply stand down until the spawning biomass appears in greater numbers...which also does NOT necessarily conform to a set date of February 15 but, can vary greatly from year to year as Moon, Tide, and Ocean Conditions such as water temperatures dictate.

A 26 day shift in the Trawl Cod Start Date has no rational purpose in managing the cod fishery other than limiting the ability of the top producers for the benefit(?) of those that "chose" to not participate anyway and, most of them historically switch away from trawling back to State Water pots before the Trawl quota is even caught.

Moving the Start Date back will also have the possible effect of increasing the catch effort as the timing will most likely allow the trawlers finishing the Bering Sea Trawl fishery to jump into the mix as they have the last couple years.

The current start date of January 20 has been working fine for over 25 years. The problem...if bycatch is the real issue...is those individuals that have the inability to adapt to changes in the efficiency of avoiding bycatch, NOT the Start Date.

2) ADJUSTING POLLOCK QUOTAS FROM "C/D" to "A/B"

Again, I understand it is being promoted that Immature Chinook Salmon bycatch is another main reason for this requested shift.

And again, it is being made by those that have the inability to adapt to changes in the efficiency of using methods to avoid significant bycatch. I even heard it said, by the assistant director at the most recent AEB meeting, that "small boats can not use excluders." That is NOT the case. It's that many small boats chose to NOT use excluders or take steps to move away from areas of high concentrations of salmon bycatch. Adjusting the quarterly quotas is another unnecessary step and another attempt to manipulate the efficient catch rate of those who take the necessary steps to avoid bycatch, by those who fail to do so. This is unacceptable.

"C&D" season have recently been the most productive quarters....for those that chose to participate.

Also...With future reductions in stock assessments. Would harvesting more Pollock during the spawning phase of A&B season be counter productive?

3) REDUCTION OF CATCH LIMITS

Are you beginning to see a pattern here?? It seems all of these agenda items are continued attempts by a few individuals

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to limit the success of those that have adapted to changes in the evolution of these Fisheries. The Western Gulf Fleet is comprised of only about 20-25 58' vessels...myself included. The majority of these boats pack far less than 300,000lbs. There are 70 some Western Gulf LLPs so, there are a number of boats capable of packing 300,000 lbs, in fact that's a majority. Even though I personally can NOT pack 300 I do NOT see the logic behind limiting the ability to do so. Processors may find it inefficient to operate at this new limited capacity and could be actually forced to discontinue. Again, this current 2017 C&D the majority of the fleet "chose" to NOT participate or take the necessary steps to avoid bycatch by using excluders or moving to areas of less bycatch abundance...but instead...another attempt to Limit "those who have the ability to adapt to changes in their environment"...which by the way, is Charles Darwin's definition of "Species Survival".

In summary, I personally feel it is the job of the North Pacific Fisheries Management Council to manage this Constitutional National Resource for ALL the citizens of the United States of America...NOT just a few who seem to actually put more effort into limiting the success of those who continue to successfully adapt to the continuous evolutionary changes of these modern Fisheries.

Thank you for your time and effort. I applaud you for the job you all do in dealing with so many issues, and the diversity of this user group. It's a daunting task, again Thank you!

P.S.

Please excuse this Rant...but...Don't even get me started on salmon bycatch. It's a documented fact WE kill thousands more immature chinook salmon with Purse Seines than we ever have with a bottom or mid water Trawl. I have personally been "shhhhhh'd" by more than one fisherman for even bringing up the "dead elephant under the carpet" issue. The disparity between Fisheries is alarming when there are multiple totes of immature chinook on the dock while a daily offload of salmon occurs...meanwhile offloading Groundfish there is simply one tote with a lock on it?? I understand the politics involved but, that infuriates me AND I both Seine and Trawl.

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