

Phil Anderson, Chairman
Pacific Fishery Management Council
7700 Ambassador Place, Suite 101
Portland, OR 97220

RE: Agenda Item H.4, ESA Mitigation Measures for Salmon

September 3, 2019

Dear Chairman Anderson and Council Members,

I am writing on behalf of the Shorebased Whiting Cooperative (SWC or the Co-op). The SWC was formed in 2012 with the primary purpose to manage constraining rockfish and salmon species. From 2012 to 2018, Co-op member vessels have caught 70% of all whiting landed shoreside. The Co-op, representing 18 catcher vessels, has demonstrated the ability to attain its whiting quota while minimizing encounters with non-whiting species, with an average quota utilization of 91% since the Co-op's formation. The Co-op's success is due to the many tools available to the SWC, and its systematic approach for using the tools, which enables the Co-op to manage at the individual vessel level.

At the foundation of the Co-op is a data-rich exchange of information. The SWC elicits Sea State Inc. as the Co-ops monitoring agent. Sea State has complete access to coop member NMFS fish tickets and VMS data, providing the location and time of all coop catch. Sea State distributes daily catch reports to all coop members. The information processed by Sea State, allows all Co-op management actions to be based off near real time data. This translates into effective, fine scale decisions.

The information exchange continues amongst member vessels, between shorebased seafood processors and across whiting sectors. SWC vessels communicate amongst each other while on the fishing grounds, sharing the location of tows with elevated non-whiting species. Captains relay this information to the Manager, who systematically distributes notices and warnings to the fleet. Furthermore, this data is shared with the Mothership and Catcher Processor Co-ops. Sea State maintains a website that presents high resolution mapping of VMS tracks of any hauls with elevated non-whiting species. All three Whiting Co-ops have access to these maps. This allows for a continuous stream of data, regardless if only one fleet is on the grounds, or if all three are active.

The Co-op uses this information to make management decisions that reduce the probability of encountering non-whiting species. For example, the SWC requires all members to use salmon excluders, at all times. The SWC also restricts night fishing in certain depths. The Co-op annually reviews historical catch and VMS data, and establishes closed and advisory areas. If a hot spot should arise in-season, the Board or Manager may mitigate high bycatch by closing that location. In the event a hot spot closure is opened after due time, test tows are required before fishing may resume. The Co-op is not solely limited to these tools; however, this provides an example of the SWC's current mitigation tactics.

This season, the SWC has actively been tracking and responding to encounters with Chinook and Coho salmon. During August, the Co-op saw elevated catches of Coho salmon. Encounters with Coho were spatially dispersed with no identifiable pattern. This indication of a highly mobile species made it challenging to identify a hot spot to close. The fleet responded to Coho by moving effort, increasing fleetwide communication and tracking capacity on the Seastate site. The SWC is continuing to closely

monitor Coho catch. The Co-op also saw elevated catches of Chinook over the span of three days. We analyzed the catch information to identify the depth range and location responsible for the recent spike in Chinook landings. The Co-op Board responded to this information and moved to close the apparent hot spot for one week. The day following the effective closure, more Chinook were caught North of the closure. The Board again moved to expand the area closure to encompass the entire depth range and span over a third of Washington's coastline. The closure has been in place for three weeks and the area remains closed. This measure has effectively reduced the Co-op's bycatch rate – during the last three weeks, the Co-op's Chinook salmon bycatch rate has been half the number that it was when the closure went in.

Agenda item H.4 jeopardizes the Co-op's ability to function and successfully mitigate encounters with Chinook or other non-whiting species. The proposed Block Area Closures (BAC) as an in-season tool, would negatively harm our operations. Because SWC vessels deliver to shorebased processors, our boats cannot afford to travel potentially long distances to find fish outside of a BAC. The SWC fleet is comprised of a wide range of sizes. Some SWC boats have the horsepower to fish beyond 200 fathoms, while many do not. A BAC forcing boats to fish outside blanket depth ranges would cause economic hardship to vessels, processors and the coastal communities they support, while not necessarily providing the intended benefit. The SWC has the authority to close fine-scaled hot spots, that minimize economic loss while successfully mitigating bycatch, as demonstrated above. Enforcing a BAC on SWC vessels would completely undermine the commitment, investment and sacrifices SWC members make to responsibly manage the fishery.

The SWC supports the proposed Whiting Co-op rules, alternative 2, salmon plans. We recognize that the SWC is under a different management regime than the at-sea Co-ops. We ask the Council and NMFS staff to support the SWC and work with us to find a pathway which allows us to submit a salmon plan for review, synonymous to the at-sea Co-ops. We also ask, that in the event the Council moves forward with BAC's, the Council/NMFS identify a mechanism to distinguish SWC vessels from non-coop members, when choosing to impose a BAC. The SWC is committed to achieving national standards 1, 7, 8 and 9 – we aim to achieve optimum yield while minimizing costs, allowing us to sustain coastal communities and take action to minimize bycatch to the extent practicable. We see the best approach for attaining these standards and mitigating impacts on salmon is through the management of cooperatives. The Co-op can react to events faster and can manage at the individual vessel level with acute tools. We ask that the Council and NMFS support the SWC's salmon mitigation efforts, consistent with the support provided to the at-sea Co-ops.

Sincerely,

A handwritten signature in cursive script that reads "Kristin McQuaw".

Kristin McQuaw

Shorebased Whiting Cooperative