RC 030

January 7, 2014
Re: Kodiak Finfish Proposals 43, 44, 45, 101, 102

Mr. Chairman and members of the Board of Fisheries:

Hello, my name is Ron Naughton, & I am the skipper of the trawl vessel Cape Kiwanda. I was born in Kodiak and have been fishing Kodiak Island and the Bering Sea since I was 16 years old. Presently, a good two-thirds of my fishing income comes from the Central Gulf trawl fisheries.

I do not support proposals 43, 44, 45, 101 or 102. I will speak directly to Proposal 45. Under the old observer program, I was the one to decide when to take an observer, now the new program tells me when to take an observer and randomizes the selection of trips. Even though the percent of observed catch is now less than the 30% goal, the data is much improved because that bias has been eliminated. Observers are now deployed in the Gulf randomly across all fisheries and vessels throughout the year.

As put forth in the State Department of Law Memo, the Board of Fisheries must first consider (A) whether or not a State Observer Program is the only practical data-gathering or enforcement mechanism for that fishery. (The Federal Observer Program already exists and is already in place.) (B) Not unduly disrupt the fishery (I believe it would conflict with the Federal program that is already in place); (C) can be conducted at a reasonable cost (The Kodiak ADFG groundfish managers estimate that it will cost $500-600,000 just to implement a state observer program and this does not include costs to manage any new state fisheries. Alaska does not have extra money to spend on an observer program that's not really needed; & (D) Can be coordinated with observer programs of other agencies, including the NMFS, NPFMC and the IPHC. Keeping in mind that fish do not respect borders drawn on a chart and that in one tow I can cross that line several times, I believe it would be extremely impractical to coordinate a State Observer Program with the existing Federal one.

The NPFMC motion for the trawl bycatch management package calls for 100% observer coverage which will be necessary for individual vessel accountability. This is how it is now for the Rockfish Program. In the current race for pollock, 100% observer coverage in state waters makes no sense and would be a waste of money. Furthermore, when in State waters I primarily target pollock, so data for salmon bycatch may increase, but there is no method to incorporate this extra data into the Federal catch accounting system. Please collaborate with the Council to develop a workable trawl bycatch management package for our fleet so we can individually be held accountable for bycatch.

Thank You.

Ron Naughton
Kodiak AK