

Patrick O'Donnell

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September 30, 2022

Mr. Simon Kinneen, Chairman
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

Submitted Electronically

Re: Trawl EM – Agenda Item C3

Dear Chairman Kinneen:

My name is Patrick O'Donnell and I own the 85 foot trawl catcher vessel Caravelle. The Caravelle operates primarily in the Gulf of Alaska, and is endorsed to fish in the GOA, Western GOA and Bering Sea. The Caravelle participated in the EM EFP the last several years, and believe that EM is a valuable tool we should have access to moving forward. However, I have significant concerns with the proposed EM regulated structure as described in the analysis. Alaska Whitefish Trawlers Association submitted a comment letter, and I align myself with that letter.

In recent years we have talked a lot about wanting to create and sustain resilient fisheries, and resilient coastal communities. Resiliency requires flexibility and the ability to adapt quickly and effectively to changing conditions. We will not achieve resiliency through rigid systems and the creation of more boxes. The Agency's proposed EM approach does not recognize Central Gulf Trawl reliance on mixed trips, and in fact the analysis appears to define mixed trips very differently from how trawl fishermen define mixed trips.

My business plan for the Caravelle relies on the ability to do mixed trips, including pollock and flatfish. Any EM program that does not allow mixed trips will not work for the Caravelle, and I am very disappointed that the Agency's solution to that issue is that I should simply not participate in EM at all. I value EM and think a better approach is to put in the time to develop a program that does not have the effect of categorically excluding a subset of vessels. The analysis is not completely clear on whether EM could be used in a mixed trip including flatfish, but it definitely does not discuss how 100% retention would impact halibut. Currently halibut are required to be put back in the ocean, but under EM 100% retention would be required. This will impact halibut mortality in real life, and would probably require changes to DMRs in the accounting world.

In past years when pollock TAC was lower the Caravelle frequently did mixed trips of half pollock and half flat fish. In more recent years pollock TACs have been at historic highs, and these types of mixed trips were not as necessary. However, pollock TACs are clearly decreasing from those historic highs, and ensuring the ability to do efficient mixed trips that include flatfish is important.

Thank you for considering my comments on this agenda item.

A handwritten signature in black ink, appearing to read "Patrick O'Donnell". The signature is fluid and cursive, with a large loop at the end.

Patrick O'Donnell, President
Golden West Fisheries, Inc.
Owner F/V Caravelle