

GROUND FISH MANAGEMENT TEAM REPORT ON FISHERY MANAGEMENT PLAN
AMENDMENT 22: OPEN ACCESS LICENSE LIMITATION

The Groundfish Management Team (GMT) discussed updates to the “Preliminary Draft Environmental Assessment (EA) for Pacific Coast Fishery Management Plan Amendment 22: Conversion of the Open Access Fishery to Federal Permit Management” (Agenda Item I.4.a) since the March meeting and reviewed the Supplemental Groundfish Allocation Committee’s Report (Agenda Item I.4.c).

The GMT has not had the opportunity to do a sufficient review of the EA due to other higher priority Council topics over the last year (2009-2010 specification and management measures and trawl rationalization). Elements in this open access program may require GMT analyses, and if necessary, the GMT does not have the time to do them under the current timeline. The GMT recommends that the Council delay final action at this meeting to allow for additional analyses that may better inform a Council decision.

The GMT would like to reiterate several important issues that were brought forth in previous statements (Agenda Item F.4.b) that still warrant further discussion.

Purpose and Need statement in relation to the groundfish FMP

The GMT recommends that the Council re-evaluate the purpose, needs, goals and objectives of this program as it relates to the overall objective of the groundfish fishery management plan (FMP). The alternatives should provide clear rationale on how they are intended to meet the goals and objectives of the open access license limitation and groundfish FMP. The GMT has noted that differing management strategies in each state have resulted in different ideas on the optimal fleet size and the need for effort reduction. This situation complicates implementation of a coastwide program if goals and objectives are uniform across states. Although the revised EA describes how the different alternatives affect different states and port groups the alternatives still have a one-size-fits-all approach which may not be appropriate, especially when considering alternatives that reduce fleet size.

Overcapitalization

The EA suggests that the open access fishery is overcapitalized, yet there is no recent analysis to suggest an appropriate fleet size. The level of overcapitalization in the EA is based on an old analysis performed by the Scientific and Statistical Committee in years when the fishery was unrestricted (1993-1999). Since then many regulatory changes have been implemented which reduced the fleet size including complex Rockfish Conservation Area’s and restrictive trip limits. The GMT suggests a more recent analysis informing the level of overcapitalization in the current fleet would better inform a Council decision. This analysis is important to establish baseline conditions from which we are making changes.

The appropriate level of fleet capitalization may vary depending on the specific goals of the program. If for example, the Council’s goal is to establish a fishery that harvesters can rely on alone for income then the open access fishery could be classified as overcapitalized under current conditions. However if the Council views the open access fishery as one that can provide supplemental or intermittent opportunity, then the appropriate level of capitalization may be viewed differently. This year is a good example of how the open access fishery provided salmon

fishers with the opportunity to supplement their income due to severe restrictions to salmon opportunities. The GMT recommends the Council explore the type of opportunity they want the open access fishery to provide in the future and specify this opportunity in the goals and objectives.

Disparity of landings between species during the qualifying window and effects of vessel qualification

Regulatory disparity between lingcod and sablefish landing limits during the window period (1998-2006) biases qualification for permits in favor of the sablefish fleet. Prior to this period (1994-1997) landings of these species were nearly equal. During the window period lingcod landings were ~3.5 percent of sablefish landings due to more restrictive landing limits. Lingcod limits ranged from 300 to 500 pounds per month during the window period versus 4,200 to 10,500 pounds for sablefish. This pattern is true for other non-sablefish species, therefore, fewer non-sablefish participants will qualify given weight based qualification criteria due to variations in management strategies.

Potential economic benefits of trip limit increases

The expected outcome of reducing the existing fleet would be increased trip limits. The EA shows that even if the fleet was reduced to a very low level, minimal if any increase to trip limits would be realized. In addition effort shifts from different targeting strategies and permit transfers from latent or low producing vessels to new permit owners may negate any benefits and may actually reduce trip limits. The Council may wish to explore tools such as target species endorsements and vessel length endorsements.

Incidental “C” permit

The GMT had varying interpretations of how the “C” permit would meet the purpose and needs and implications of this permit. Further clarification is needed on the details of this permit.

The GMT requests that the Council provide guidance on the level of GMT involvement needed for this process. If more in-depth analyses are needed, the GMT requests the Council schedule a GMT meeting after the November Council meeting to work on open access analyses.

GMT Recommendations:

1. Defer final action on open access at this meeting to allow the Council to re-evaluate the goals and objectives of this program and revise the purpose and needs.
2. Approve a GMT meeting between November and March to discuss open access license limitation.

PFMC
9/11/08