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Dorothy Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, #101  
Portland, OR 97220

Dear Chair Lowman and Council Members:

The following comments are based on a review of the 2/11/2015 draft of the WCR Strategic Plan.

Page 7 states that the “Sustainable Fisheries Division is responsible for” many functions including “creating long-term economic and social benefits to the nation from living marine resources.” However, strategy bullet points for “Social and Economic Contributions” under “Sustainable Fisheries” section seem to indicate maintenance of the status quo rather than improvement of economic and social benefits; this can be seen from terms such as “maintain fishing community participation” and “enhance fishing community resilience.” With a total of 60 strategy bullet points in the WC strategic plan to drive decision making over the next half decade, one would assume there would be at least one strategy statement that explicitly supported increased economic and social benefits via improved responsible utilization of the resource, which is essentially half of the purpose of the MSA. There is one existing strategy statement to “support industry advances consistent with the sustainability of West Coast fisheries resources,” but that statement is vague and does not necessarily imply benefits for West Coast communities. The strategy document sends the message that if fisheries don’t regress over the next five years, and after collecting millions of dollars from industry in cost recovery fees, that NMFS will have met all their goals and done an excellent job. That seems to be setting a very low bar and not at all in line with the MSA.

The Pacific Council provided a 1/22/2015 feedback letter to NMFS on the 11/7/2014 draft of the WCR Strategic Plan. Seven paragraphs of that feedback letter gave suggestions for modifications. Suggestions from six of the seven paragraphs were included as updates in the 2/11/2015 draft. Here is the paragraph in the Council feedback letter for which suggestions are not apparent in the updated draft:

*Under the topic of organizational excellence, one strategy that should be added is a review of staffing and process needs to make rulemaking more efficient. Delays in implementing Council actions can be very costly to the fishing industry. Committing to and improving a process like the groundfish omnibus prioritization process is vital to ensure the efforts of the Council result in benefits that accrue to the industry. Likewise, the process and disposition of fees charged to industry need to be transparent to ensure programs are cost effective.*

Industry knows that NMFS has not been transparent with cost recovery specifics, and industry suspects that NMFS has not been efficient given the macro cost recovery numbers for “incremental” program costs, but we will not know that for sure until transparency is truly realized and cost recovery specifics are shared. Given that NMFS is pledging transparency and efficiency in general in this Strategic Plan, it would be appropriate to respond to the Council’s request with specific strategies that address the Council’s specific request(s) in the paragraph above. Another benefit to transparency would be Council (and stakeholders) gaining a better idea of what are the most time consuming components of rulemaking and program incremental costs so that future Council actions could be better formulated and prioritized. There is one existing strategy statement remaining from the November 2014 draft to “create administrative efficiencies in the regulatory system,” but that statement is vague, limited in scope, and does not address the suggestions made by the Council.

NMFS responded to one item in the Council feedback letter by adding habitat mitigation of adverse effects from non-fishing activities through internal and external partnerships (bullet point 3 under “Consultations and Support” on page 14); also deserving of consideration is mitigation of adverse effects from non-fishing activities on fishing communities. One specific example is the ongoing conversation around the proposed wind float site that is in one of the finite locations on the west coast where whiting typically congregate. Removing one of the “cleaner” (less bycatch per target species catch) locations from the whiting fishery could lead to more bycatch, larger carbon footprint per same amount of target species catch, and inefficiencies in executing a fishery. This would mean many of the stated strategic plan objectives would be negatively impacted by the planned wind float placement. Given that working with internal and external partners prior to project location selection could have prevented this trouble, it would be appropriate to add a bullet point (or supplement bullet point 5 under “Consultations and Support”) for mitigation of adverse effects from non-fishing activities on fishing communities through internal and external partnerships.

Both statistical and anecdotal evidence shows we currently have healthy oceans and healthy stocks trending in a positive direction. Given this situation, it would be appropriate in the five year plan to develop strategies designed to improve (not just maintain) benefits from fisheries that did not harm conservation efforts. There are a few strategies in the document that could have side benefits to fisheries such as “development of new survey technologies and methods to assess population in sensitive habitats,” but a reading of this document shows there does not seem to be an explicit, directed effort to improve benefits from fisheries.