



August 30, 2016

Eileen Sobeck
Assistant Administrator of Fisheries
NOAA Fisheries Service
1315 East West highway
Silver Spring, MD 20910

RE: March 2016 PFMC Trawl Gear Package

Dear Ms. Sobeck,

In March of this year, the Pacific Fishery Management Council (PFMC) unanimously passed a trawl gear regulation package that would greatly enhance the fleet's ability to harvest groundfish stocks. The rule would have stripped out most of the archaic net and mesh restrictions and allowed fishermen to configure their gear in a way that is the most efficient to catch their target species and avoid those species that they do not want to catch. This change was a direct result of the trawl fleet proving itself over the previous 5 years of the trawl catch share program that 100% accountability was very effective in modifying the fleet's behavior.

Then in June, the PFMC approved quotas for the 2017-18 biennium, with associated trawl allocations that will make a directed rockfish fishery possible for the first time in almost 20 years. The increases were a result of new stock assessment information that showed numerous rockfish stocks rebuilding years ahead of schedule, with many species being declared rebuilt or barely missing that threshold. In fact, the trawl allocation for all of the rockfish species for 2017 amounts to what the average rockfish landings were on the west coast for the years 1980 through 2000.

To say that the west coast trawl groundfish fishery participants were excited about these two developments would be an understatement. To address this opportunity, the Oregon Trawl Commission scheduled a marketing strategy meeting the day before our regular quarterly meeting held earlier this month. In the meeting announcement, we invited the fleet and processors to attend, because restarting a fishery is no easy task and we knew that everyone needed to be at the table.

Unfortunately, the week before our meetings, I received a call from a processor representative who had heard the gear regulation package wouldn't be in place by January 1. After I spoke with PFMC staff, that fact was confirmed, but it was worse than that, as they had been told by NMFS staff that implementation wouldn't be until summer of 2017. This delay is simply unacceptable.

This is especially troublesome, because I am not sure what has changed in the last 2 months that would delay the package by 6 months. At the June PFMC meeting, nothing was said about a delay, even though it was known by everyone that two well-respected staffers were known to be moving on and wouldn't be working at the region after the end of the month. It is also my understanding that


significant progress had been made on the NEPA document up till then and everything was on track for a January implantation.

In spite of the unannounced delay, the OTC went ahead with the market strategy meeting. The meeting was well attended and everyone agreed that there was a tremendous opportunity for the industry in the first four to five months of the year, but the gear package had to be in place. Outside of the opportunities that were discussed, we had an in-depth discussion of the planning that needs to be done to get the infrastructure and personnel in place. As an example, it's estimated an additional 100+ filleters would need to be hired and trained, as well as numerous other positions that would need to be filled, packaging ordered, distribution logistics planned. This can't happen with the uncertainty on this matter.

With that, I was instructed to write this letter to you to encourage you to mobilize assets in the agency and get the gear package in place by January. There is precedence on such matters, as the catch share program implementation was lagging and your agency mobilized effort in an all hands-on-deck approach to get the program in place in 2011. As for any additional costs, I remind you that NMFS is a stakeholder in this fishery and receives 3% of the landed value of the shoreside sector's landings. If we could land 20 million pounds of rockfish in the first five months, the agency would earn an additional \$300,000, which should be more than enough to offset any costs, especially if contract labor was used.

For over 15 years, the groundfish fishery and the communities that depend on it have paid the price, done the right thing and waited for the day that their fishery would be rebuilt and opportunities would be restored. January 1, 2017, is that day. I hope you would make that restoration of our fishery a reality.

Sincerely,



Brad Pettinger

Director

CC: The Honorable Ron Wyden
The Honorable Peter DeFazio
The Honorable Kurt Schrader
The Honorable Suzanne Bonamici
The Honorable Earl Blumenauer
The Honorable Greg Walden
The Honorable Jeff Merkley