Fwd: Comments for Emergency Council meeting 10/17/14

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>  Fri, Oct 17, 2014 at 10:33 AM
To: Kelly Ames - NOAA Affiliate <kelly.ames@noaa.gov>, Donald McIsaac - NOAA Affiliate <donald.mcisaac@noaa.gov>, Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

-------- Forwarded message --------
From: Rod Moore <rod.wcseafood@gmail.com>
Date: Fri, Oct 17, 2014 at 10:20 AM
Subject: Comments for Emergency Council meeting 10/17/14
To: pfmc.comments@noaa.gov

To Ms. Dorothy Lowman, Chair

Dear Chair Lowman and Council members:

I am writing on behalf of the West Coast Seafood Processors Association to comment on what I believe will be the proposed discussion / action items before the Council during this afternoon's emergency conference call. Given that a situation summary is not available, no clear description of the proposed action is on the Council website, and NMFS has made no effort to reach out to shore-based processors who will be affected by pending decisions, I request latitude in commenting on issues that may or may not be on the actual Council agenda.

1. Reallocation of darkblotted rockfish - We understand that a problem exists with the offshore whiting sectors exceeding their set-aside for darkblotted. We also understand that the potential solution to this problem is to transfer unused darkblotted set-aside from the open access sector to the offshore whiting sector. In the interest of allowing the offshore whiting sector to continue fishing in order to try to achieve the optimum yield for the benefit of the U.S. fishing industry - as provided by National Standard #1 of the MSFSCMA - we support this transfer.

   However, we note that this should not be considered a precedent for every other fishery and become a common-place action every time somebody gets into trouble. Indeed, in prior years when the non-whiting trawl fishery came close to or exceeded a species limit, the in-season answer was to shut them down, regardless of the economic impact on fishermen, processors, and coastal communities. Rather, the Council should examine the amount of set-asides made to various fishery sectors, especially in light of rebuilding successes, and adjust them up front so we do not run into this problem. If the set-asides are balanced appropriately, there is no reason to suddenly engage in this emergency action.

2. Imposition of the Ocean Salmon Conservation Zone for the Pacific whiting fishery - The Pacific Coast Groundfish FMP regulations at 50 CFR 660.131(c)(3) provide that NMFS will implement a closure of "[all] waters shoreward of a boundary line approximating the 100 fm (183 m) depth contour...when NMFS projects the Pacific whiting fishery may take in excess of 11,000 Chinook within a calendar year." We understand that the Pacific whiting fishery has met or is about to meet this trigger point and that the Ocean Salmon Conservation Zone will be implemented. However, we also understand that NMFS is recommending (again, with absolutely no consultation with affected shore-based processors) that the closure be extended to all waters shoreward of 150 fathoms. This has a serious adverse effect on any shore-based fishing for whiting due to run times and potential weather problems. The 100 fathom line was carefully developed in conjunction with the biological opinion examining bycatch of salmon in the Pacific whiting fishery. To extend that with no notice, no consultation with the shore-based sector and not opportunely for the shore-based sector to provide recommendations on ways to avoid bycatch without extending the depth restriction is both arbitrary and discriminatory. The shore-based sector as a whole is allocated 42% of the non-tribal harvest;

https://mail.google.com/mail/u/0?ui=2&ik=5b903c2f8&view=pt&search=all&imhd=1491f2d0a229d5ed7&simh=1491f2d0a229d5ed7
shore-based processors provide thousands of jobs and millions of dollars of revenue during the Pacific whaling season. Shore-based processors are allocated 20% of the shore-based whaling individual quota. They are registered, regulated, observed and inspected. It is time that NMFS treats the shore-based sector with the same attention they seem willing to give to the offshore sector.

3. Reapportionment of whiting - We understand that - pending necessary and appropriate discussions with tribal authorities - NMFS may reapportion some or all of the remaining tribal whiting set-aside to the non-tribal fishery. If that does occur, we note that several shore-based processing plants are still operating and will continue to operate through the end of the year. Earlier this week I provided information via email to the Office of Sustainable Fisheries at the NMFS West Coast Region in response to an informal request. The text of that email, sent to Kevin Duffy and Frank Lockhart, is as follows:

I know you’re on leave but thought I would follow up on the question you asked me regarding processing schedules for shoreside companies: of the 4 I talked with, one is shut down, two are likely to keep going through this month, and one will keep going as long as there is fish. Hope that helps you out.

Since that time I have received information that 3 other companies are continuing to operate; as they are not members of WCSPA I will defer to them for their comments.

Thank you for the opportunity to provide comment on the pending emergency action.

Rod Moore
West Coast Seafood Processors Assoc.
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503-227-5076

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Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council
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Portland, OR 97220
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Fwd: public comment
1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov> Fri, Oct 17, 2014 at 12:01 PM
To: Kelly Ames - NOAA Affiliate <kelly.ames@noaa.gov>
Cc: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>, Donald McIsaac - NOAA Affiliate <donald.mcisaac@noaa.gov>

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From: Richard Carroll <rcarroll@lwacofish.com>
Date: Fri, Oct 17, 2014 at 11:40 AM
Subject: public comment
To: pfmc.comments@noaa.gov

Purpose of the Emergency Meeting

This emergency meeting will be limited to one agenda item, which will include Council considerations to take final action on in-season adjustments to 2014 trawl fisheries related to Pacific whiting, darkblotched rockfish, and the incidental take of salmon.

For the framing of my comments I have copied the purpose of the emergency meeting. The general lack of information that is conveyed in this statement of purpose is remarkable.

While we may be somewhat aware of the circumstances that precipitated this "emergency". The lack of consultation and communication of the proposed alternatives and remedies, to the various stakeholder groups that will be impacted by the outcome is of this emergency meeting is distressing.

All of the parties that participate in the whiting fishery and other fisheries will be significantly impacted in both the directed fishery and in the finished product marketplace by whatever action is taken in this emergency session. It would have been much appreciated if there were some form of prior consultation in this process prior to the development of a proposed resolution.

The absence of the opportunity for full public participation and full
stakeholder representation reinforces the perception of inequality and overt favoritism by council management in its dealings with stakeholders impacted by this process. It's pretty much business as usual.

Richard Carroll
Ilwaco Fish Company

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Fwd: In re: emergency meeting to discuss reallocating darkblotch rockfish.

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov> Fri, Oct 17, 2014 at 12:02 PM
To: Kelly Ames - NOAA Affiliate <kelly.ames@noaa.gov>, Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>, Donald McIsaac - NOAA Affiliate <donald.mcisaac@noaa.gov>

received by Noon
--------- Forwarded message --------
From: Ralph Brown <ralphbrown1@charter.net>
Date: Fri, Oct 17, 2014 at 11:51 AM
Subject: In re: emergency meeting to discuss reallocating darkblotch rockfish.
To: pfmc.comments@noaa.gov

To the Pacific Fishery Management Council:

In re: emergency meeting to discuss reallocating darkblotch rockfish.

I hope you will refrain from reallocating Darkblotch Rockfish. Reallocation of fish because one sector can’t or won’t stay within their quota destroys the creditability of the Catch Share Program.

Personal and fleet accountability is the cornerstone of the Catch Share Program. Now, the first time that a fleet overshoots their quota, it is being suggested that they not be held accountable and some other sector has to look at a reduction of quota. This is a very bad precedent.

The Mothership Fleet argued that they didn’t need to be part of the IFQ fishery, and that Co-ops had the ability to control by-catch. They prevailed in the discussion and it was decided to follow their advice and create a co-op fishery. Now they don’t want to live with that decision.

I realize that the suggestion is that fish be moved from the open access fishery as the open access fishery is not projected to reach its quota. This fishery has a history of changing very rapidly. They have been assured that a certain amount of fish is available to them. Now that assurance is questionable.

The message to other sectors of the groundfish fleet is that there is no assurance that fish is actually going to remain available throughout the year. This time, the fish is taken from the open access fishery. What if the Mothership fishery goes over quota again? Next time it comes out of a different sector. What if the next overage is bigger than the open access quota where does it come from then?

I have heard the argument given that the whiting fishery is so much bigger that they don’t have enough by-catch to catch all of their quota.

Welcome to the club. No other fleet has enough by-catch to catch their entire quotas, yet are still being held to their by-catch caps. This is the stick that goes with the carrot of having the flexibility of adjusting fishery behavior to eventually realize the maximum benefit from the fishery. Holding individuals and fleets feet to the fire is the cornerstone of Catch Share programs. Without this the race for fish begins again.

Please don’t destroy this program by giving the message that certain fleets will not be held accountable for their actions.

Thank you,

Ralph Brown
Trawl Fisherman
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