

April 2, 1999

Jerry Mallet, Chairman
Pacific Fishery Management Council
2130 SW Fifth Ave, Suite 224
Portland, Oregon 97201

Mr. Chairman and Council Members:

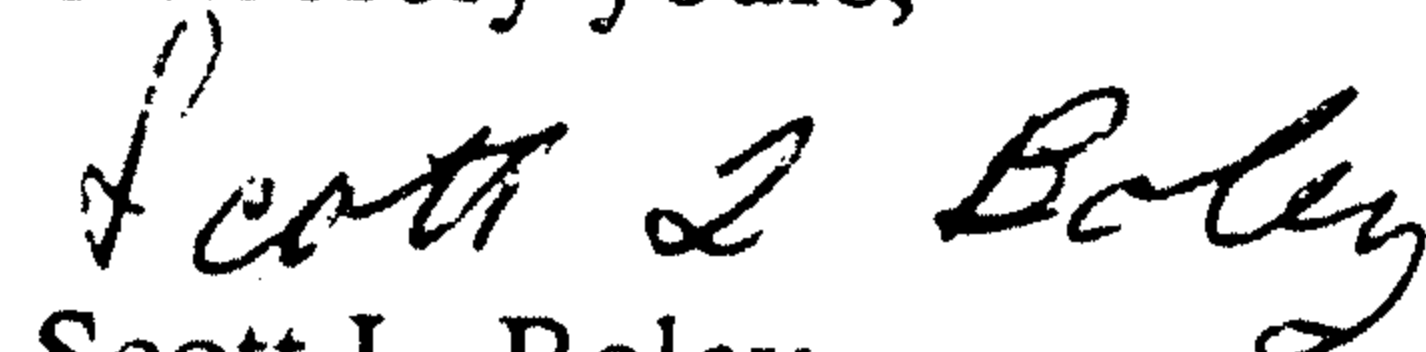
Following is a proposal to restrict entry to the commercial groundfish fishery for PFMC waters. This proposal is intended as a first step in what will have to be a series of actions to more closely match fishing capacity to resource abundance off the West Coast. At the recent Rockfish Forum held in Monterey, Calif., excess harvest capacity was identified as one of the most critical problems facing us. This is not a new conclusion, but will not change unless we initiate fleetwide efforts to rationalize the fishing capacity to more closely match resource abundance.

In 1994 when we passed and implemented the Limited Entry Plan, Total Allowable Catch (TAC) for many species was much higher than present levels. We also had a large number of past participants, many of whom that have since dropped out of the fishery. I still believe that Open Access was the best option we had at the time to keep workload at manageable levels, and was the most workable solution for the TAC levels of 1994. However, times change, TAC's are much, much lower for many species, and it is clear that efforts will have to be made to not only limit the fleet, but to actually reduce the fleet if individual fishers are to remain viable. Before serious consideration can be made of proposals to reduce the fleet, you first need to stop the influx of new entrants. This proposal is intended to be the first step.

Mr. Gary Smith, the open access representative to the GAP, has agreed to present this to the Panel. My hope is that the GAP will recommend to the Council that they initiate the process for a Plan Amendment to restrict entry. If the Council agrees, then the Council will need to establish a control date and notify the public. The elements for this proposal can then begin a process of review and modification. As well, other proposals can also be developed that will yield a reduced fleet in a more rational manner than just letting the individual vessels go broke. I realize the Council cannot move very quickly in a plan amendment process. It is important though to quickly begin the process of public review and discussion, in order to get better definition of exactly what solutions will work best, and be able to implement those solutions in a reasonable framework.

My goals have been and remain the same -- **to have sustainable fisheries for all coastal communities, with a diversity of gear types and vessel sizes.** To achieve this at present catch levels however, it is clear that we do not need as many vessels as we presently have. I hope you will agree and begin the process to resolve at least this aspect of the many problems facing the West Coast Fisheries.

Sincerely yours,


Scott L. Boley

Proposal to Restrict Entry to Groundfish Fishery (End Open Access)

Summary:

At present in the Pacific Coast Commercial Groundfish fishery we have three types of vessels participating. One is Limited Entry Trawl vessels, the second is Limited Entry Longline vessels, and all remaining vessels are lumped into a Category called Open Access. The Open Access category has not had any restrictions placed on it as far as entry, and is composed of some new vessels and entrants, as well as a number of historical participants in the groundfish fishery that were fishing with gears other than groundfish trawl or longline (called exempted gears in the 1994 Limited Entry Plan, because they were not included in the permit system) This past year the PFMC has established trip limits for vessels without L. E. Permits (Open Access vessels) that are lower than those allowed for vessels with permits, regardless of history of a particular vessel in the fishery. It is widely recognized that there is excess harvest capacity within the L.E. trawl fleet in particular, as well as the groundfish fleet in general, including open access vessels where new entry is still permitted.

General Proposal:

The number of vessels in the groundfish fishery should not be allowed to further increase. Any new entrants to the fishery should be required to purchase an existing vessel, or to retire an existing vessel of similar fishing capacity if placing a new vessel in service. Additionally, all present vessels in the fishery should be recognized for their historical participation, with long term participants receiving recognition for their history and dependence on commercial fishing, regardless of gear type.

Specific Proposals:

Establish a federal permit requirement for all active vessels participating in West Coast Groundfish fisheries. Any vessels with an existing L. E. permit, or any currently active vessels landing groundfish in 1998 or before would receive either an "A" permit, or a "B" permit.

"A" Permit.-- Vessels presently holding an "A" permit, or vessels meeting the minimum landing requirements for line gear during the 1984 to 1988 window period (historical participants) would receive an "A" permit. The permit would have an endorsement for trawl, longline, or other line gear (troll gear, dingle bar, porta-gee, etc.), as is appropriate for history of the vessel. A trawl endorsement would allow use of any fishing gears including line gears (with some restrictions within a fishing period), a longline endorsement would allow only use of any line gears, while a line endorsement would only allow use of line gears excluding longline.

"B" Permit.-- Vessels currently participating by landing fish in the Open Access fishery that do not meet historic catch requirements for an "A" Permit will receive a "B" Permit, irrespective of historic catch.

The Total Allowable Quota for "A" permits, or for "B" permits would be determined by allocation of the TAC, based on historical share or poundage for all participants in each permit category. (Similar to the system now in place to separate Open Access and L.E. vessels.)

Process and Action Items:

The Pacific Council should establish a control date notifying fishers that future entry to the West Coast Groundfish fishery may be restricted after that date, then move into a process for analysis and plan amendment to the Groundfish Plan.

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