

Coos Bay Trawlers' Association, Inc.

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A Non-Profit Organization

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MAY 27 1999

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May 27, 1999

Ad-Hoc Allocation Committee
c/o Pacific Fishery Management Council
2130 SW Fifth Ave Suite 224
Portland, OR 97201

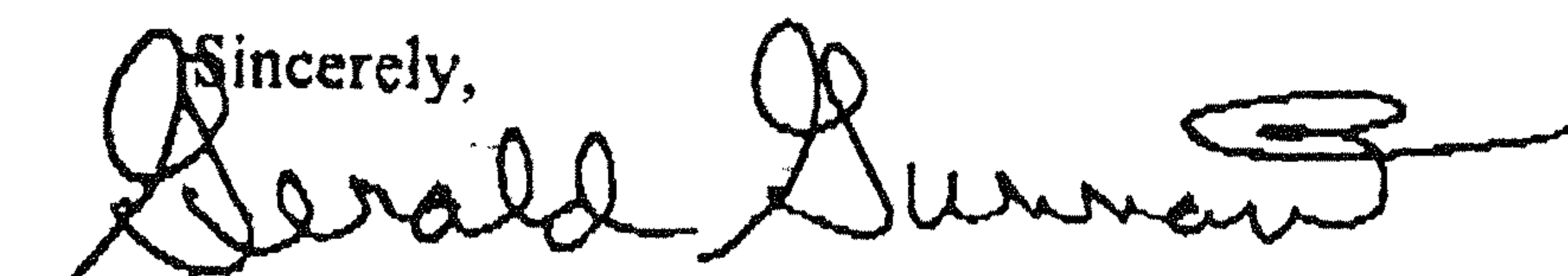
Ad-Hoc Allocation Meeting June 2 & 3

We are unable to attend the committee meeting this time but want to send our wishes for a successful conclusion to this rather hard decision making process. We feel assured that an amicable solution will be reached. We want to offer some comments for consideration during this deliberation.

Is the lingcod predicament (perceived depletion due to overexploitation) based on insufficient assessment information; Is the present southern bocaccio predicament due to migration brought on by changing ocean conditions; Is Mexico experiencing increasing numbers of bocaccio from their waters right now; and can Mexican bocaccio can be purchased at any seafood market and many grocery stores in California? Is the total geographical distribution of bocaccio covered in any survey being utilized by current assessment authors?

In developing preliminary options for allocations involving a rebuilding plan for lingcod and bocaccio rockfish, we urge the committee to treat all gear types equally. The Council is charged with minimizing gear conflicts and we feel the committee maybe making options which would increase conflicts. If the committee adopts options that would cause shifts in vessel size and gears, the fleet would not only increase conflicts with gear but it would also increase landings and catch of these species. There is no scientific evidence available to back the theory that one gear type is more selective when it comes to protecting perceived depleted species than an other gear type. If the more efficient gear option choice is adopted, it would increase the catch/landings as more pot gear is deployed and increase the gear conflicts by having more pot gear in the ocean. Side boards are needed on permit stacking and gear swapping and we are not opposed to these concepts. In fact we have proposed many times the concept of stacking permits on trawl vessels, also. Careful planning is necessary to make this a successful step towards consolidation of the fleet.

Every fishery has by-catch. Every sector has testified before the Council of incidental catches of these species and the sad demise of the fish, especially bocaccio, when returned to the sea. By-catching lingcod or bocaccio in some areas is unavoidable by all sectors even though these species are not being targeted. The question is, How can the Council remove incentives of targeting these species while not wasting the catch needlessly? One way to accomplish this goal would be to require full retention of these two species and the sale of the processed fish under the "overage program". Under this scenario, the incentive to target the fish is removed because the fisher or the processors can not profit from the sale and the money the sale generates could benefit future research activities.

Sincerely,

by: Gerald Gunnari, President, Coos Bay Trawlers' Association, Inc



Joshua Sladek Nowlis

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1 June 1999

Jerry Mallet, Chair
Pacific Fishery Management Council
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FAX: (503) 326-6831

ATTN: ALLOCATION
COMMITTEE

Dear Mr. Chair and Other Members of the Council:

Please consider these and the attached comments in your development of rebuilding plan options for bocaccio, lingcod, and Pacific Ocean perch (POP). I spoke to you and submitted written comments in April at the last Council meeting. These comments are attached, and I ask you consider them with regard to process and to the variety of tools the Council should consider. I will flesh out a couple of these tools in this letter.

There are two basic issues involved in these rebuilding plans. First, the Council must ascertain whether and to what extent we need to reduce fishing mortality rates on these stocks so that they can rebuild in the specified timeframe. Preliminary estimates that have come to my attention have suggested that these cuts may be slight. However, I ask the Council to consider some concerns about making minimal cuts in fishing mortality.

- First, the suggestion that limited cuts are necessary is based on assumptions about bycatch rates that we are fairly certain are underestimates. Data from the voluntary observer program conducted out of Oregon on the trawl fleet suggest much higher bycatch rates than we assume in stock assessments.
- Second, the suggestion that limited cuts are necessary is based on an assumption that we will have average recruitment success over the rebuilding timeframe. In fact, we have had lower than average recruitment for the past several years and there is no definite indication yet to assure us that recruitment is back to normal.
- Third, the recommended levels of fishing mortality are not based on a precautionary approach. If we use the precautionary approach, we would have to build in some degree of safety to minimize the chance that we accidentally overfish the stock. Yet our assumed rates of bycatch and recruitment make it more likely that we will make this mistake.
- The Council has a precautionary approach in front of it. Last year, the Council adopted the 40-10 harvest policy. This policy would suggest that the fishing mortality rate must be zero for bocaccio and lingcod, and near zero for POP. **Based on the Council's own default policy, we should work to reduce fishing mortality on all three stocks to the lowest levels possible.**

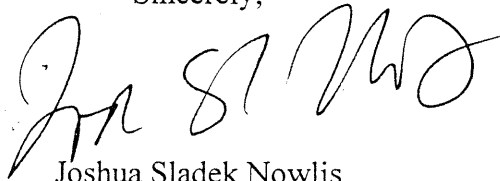
Once the Council has determined to what extent fishing mortality must be reduced, we must choose the mechanism by which to make these cuts. Reductions in the targeted catch of these three species is the easiest way to reduce fishing mortality. However, the Council has eliminated virtually all targeting of these species and thus cannot make much progress along this path. Instead, the Council must consider using marine reserves and other methods to reduce bycatch mortality.

Marine reserves provide the opportunity to reduce fishing mortality rates by protecting remnant population centers that would otherwise be vulnerable. Government and academic scientists have addressed the Council and helped identify areas where bocaccio are still abundant and other areas where bocaccio once were abundant but have been fished out. Closing these areas to fishing, at least during rebuilding, would help both protect the remaining population and provide areas where these stocks can rebuild quickly. Marine reserves also could be strategic if we can identify areas with high concentrations of these species but low concentrations of others. Finally, marine reserves can help protect habitat from the impacts of fishing gear. Since we know so little about the impacts of fishing on fish habitat, this would be a positive and precautionary step.

The other primary option for reducing fishing mortality on bocaccio, lingcod, and POP would be reductions in the quotas of co-occurring species. The Council has two sets of data that could help indicate the degree to which other quotas should be cut in order to affect maximum savings in the overfished species. The preliminary data from the Oregon trawl observer program could provide important information on the degree to which these three species co-occur with more commonly targeted species. The National Marine Fisheries Service's triennial bottom trawl surveys are another important source of similar information. Using these data sets, the Council's technical teams should be able to create a matrix that illustrate the degree of co-occurrence (as illustrated in Table 1, next page). Such a matrix would help illustrate strategic cuts in particular species the Council could make to reduce fishing mortality for overfished species while minimizing the negative impact on fishing communities.

Thank you for considering these comments, and I hope you find them helpful in your decision-making.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Sladek Nowlis', written in a cursive style.

Joshua Sladek Nowlis
Pacific Fisheries Project Manager

Attachment: Comments submitted at the April 1999 PFMC Regular Meeting

TABLE 1 – Elements of a bycatch reduction matrix

PRESENCE/ABSENCE

Target - > √ Bycatch	Bocaccio	Chilipepper	Lingcod	...
Bocaccio	1	X_{12}	X_{13}	
Chilipepper	X_{21}	1	X_{23}	
Lingcod	X_{31}	X_{32}	1	
...				

Each column would represent all hauls that contained the target species. Each element would show the proportion of these hauls that also contained the “bycatch” species. Thus, the elements along the diagonal would all be 1, and all other elements would represent the probability that a haul containing the target species would also contain the bycatch species. Numbers close to 1 in the rows representing species of concern would represent target species where quota cuts would make the most difference.

QUANTITATIVE

Target - > √ Bycatch	Bocaccio	Chilipepper	Lingcod	...
Bocaccio	X_{11}	X_{12}	X_{13}	
Chilipepper	X_{21}	X_{22}	X_{23}	
Lingcod	X_{31}	X_{32}	X_{33}	
...				

Each column would represent an average haul containing the target species. Each element would show the proportion by weight of these hauls that was made up of each “bycatch” species. Thus, each column would add to 1 (i.e., $X_{11} + X_{21} + X_{31} \dots = 1$). Along each row for species of concern, one could find the highest numbers and use those as indications of target species where quota cuts would make the most difference.