

Groundfish Strategic Plan – Public Comment Letters

Staff Summary

By September 6, 2000, approximately 50 letters had been received at the Council office. This summary is provided for informational purposes and is not meant as a factual record. The intent of this document is to (1) highlight topics noted in the public comment letters and (2) group comments received into those topic areas. The numbers in bold indicate a comment that was noted in more than one letter. The topics and comments are not ranked or arranged in a hierarchy.

Capacity Reduction

- Minimum landing requirements (MLRs) – reward most damaging operators – **5**
- MLR – may greatly impact smaller operators
- IFQs – bad for small operators, reward bad operators – **6**
- IFQs – good – **3**
- Buy-back – government funded – **12**
- Buy-back – will not work
- Buy-back– industry buys permits, government buys vessels
- Permit stacking – bad – reward large operators w/ cash flow to acquire permit(s) – **6**
- Permit stacking – voluntary – good – **6**
- Permit stacking – mandatory – good
- Permit stacking – mandatory – bad – **2**
- Open access to limited entry – "C" permits – good – **2**
- Open access to limited entry – "C" permits – bad
- "B" permits – good
- "B" permits should be transferable
- "B" permits should not be transferable
- Qualifying requirements for "B" permits in draft plan not good for small operators – won't qualify – **2**
- 50% capacity reduction – not enough
- 50% capacity reduction – too much

- Capacity reduction will have greatest impact on small operators
- Capacity reduction should focus on high impact, high catch gears types – 2
- Maintain diverse fleet

Allocation

- First priority
- Allocation proposal in Plan – good
- Allocate based on historic participation
- Tribal allocation – bad – 2
- Recreational preference, as stated in Plan – bad
- Less emphasis on large operators – allocate resources equally to all participants, not based on catch history (as in Plan) – 2

Incentives / Reward Clean Fishing

- Incentives to modify gear should be used – 4 (e.g., fewer hooks or smaller trawl net = larger allocation)
- Incentives for clean fishing as part of allocation – 2
- Smaller operators fish more cleanly – reward clean fishing
- Allow "A" permittees to use other, "less harmful" gears (e.g., open-access gear)
- Gear performance standards

Management Policy

- Observers needed – 4 (possibly, in concert with industry data collection)
- Observers not needed
- Full retention – 2
- Use weak-stock exception (National Standard guidelines) for mixed-stock fishery – 2
- Do not use weak-stock exception for mixed-stock fishery
- State management of nearshore and shelf species – 3

Area / Species Endorsements

- Area management – e.g., Conception Management Zone – small boat fishery – 2
- Area registration – good idea, especially for smaller operators
- Species endorsements (e.g., rockfish) – good
- Species endorsement– bad
- Species endorsements could harm small operators who land "unspecified" catch
- Geographic endorsements – good
- Geographic endorsement – bad

Habitat

- Protect habitat – incentives to use less harmful gear – 2

Marine Reserves

- Marine Reserves – good – 2
- Marine reserves – bad – 3

Science

- Need good science – w/ increased industry participation – 2
- Need funding for research and science

Recreational

- Commercial Passenger Fishing Vessels needs to be addressed and/or greater oversight – 2
- Recreational boats selling catch needs to be addressed

Funding

- Pursue funding from Congress for (a) buy-back, (b) science
- Add "funding" section – for: observers, surveys, data, permit stacking (loans), vessel/permit buyback, gear modification, tax incentives (for participating in capacity reduction program)

Processors

- Greater consideration of processors
- Processor quota system

General Comments

- Do not adopt Plan– **3**
- Need political will to implement – stay the course once implementation started
- Economic impacts of recreational fishery should be considered
- Raise discard estimates
- Eliminate trawl gear – **6**
- More consideration of community impacts and support industries – **3**
- Year round harvesting should be maintained because of community impacts
- Consideration of other impacts on stocks (i.e., declines due to pollution, predation, etc)
- Lack of public notice, Plan not widely available – need more time to review plan – **4**
- Plan, as written, favors large operators – **3**