



## Oregon Coastal Zone Management Association

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October 29, 2001

Mr. Jim Lone, Chairman  
Pacific Fishery Management Council  
2130 SW Fifth Street, Suite 224  
Portland, Oregon 97201

RE: GROUND FISH FISHERY MANAGEMENT MEASURES FOR 2002  
AND SUPPORT FOR A STATUS QUO ALTERNATIVE

Dear Chairman Lone:

I am writing to urge the Council, in the strongest possible terms, to exercise leniency in applying precautionary principals in setting optimum yields (OY) for some species within the groundfish fishery. There is compelling anecdotal and scientific evidence that stock abundance of critically important commercial species in the Dover sole/thornyhead/sablefish (DTS) complex are rebuilding at a much faster rate than previously expected. The most notable of these species are Dover sole and sablefish. While the new recruits will not appear in higher Acceptable Biological Catches (ABC) due to limitations in present age-growth models, the Council has the flexibility to set OY's in consideration of the devastating economic effects that would result from the application of the predictive model results on a year-to-year basis.

Groundfish harvest revenue in Oregon declined by 38% between 1995 and 1998. Ironically, modest overall revenue increases have occurred since 1998 due to increased prices and stable landings of sablefish. Of course, not everyone in the fishery shared in these revenue increases. However, the range of alternatives proposed for the 2002 management measures will cause significance decreases in expected revenue to the fishing industry compared to the estimated landings in 2001. We estimate the scale of reductions to be as follows:

- Sablefish down 35% to 54%
- Widow rockfish down 63% to 68%
- Dover sole down 3% to 28%

Standing alone, these three groundfish species represent 57% of the non-whiting groundfish fishery in 2000, and, in 2001, this would constitute 59%. If all the other groundfish species landings remain constant from last year, the overall non-whiting groundfish fishery will contract

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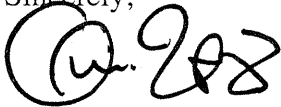
by approximately 25%. The distributional impacts of a 25% reduction would fall especially hard on certain segments of the industry. The proposed 2002 alternative's impacts, when combined with last year's declines, will cause severe economic impacts to these harvester groups.

Mr. Chairman, I respectfully submit adequate room exists within the biological model's uncertainty, and measures to reduce bycatch and discards, to allow for higher directed fishery harvests while still meeting conservation practice goals for sustainable fisheries.

The groundfish industry has made great strides in developing gears and harvest methods that minimize impacts to stocks of concern. That good work will continue. In addition, the industry has proposed solutions to address the central problem of over capacity. Fleet reduction measures will require significant financial sacrifices from people leaving the fishery and from those remaining in the industry. OCZMA will continue to work with people in the industry and with all other West Coast fishing associations to develop the means to promote an orderly transition in the groundfish industry. However, given the tragic events of September 11, 2001, we anticipate Congress will wait until next year before they appropriate funds for a buyback program and/or other forms of substantial emergency assistance to the industry. As such, actions taken by the Council at your meeting will have "make or break" consequences for many.

On behalf of OCZMA's membership of over 40 local governments along the Oregon Coast, I ask the Council to use as much discretion as possible to adopt a status quo alternative.

Sincerely,



Onno Husing, Executive Director  
OREGON COASTAL ZONE MANAGEMENT ASSOCIATION

OH/kco

cc: OCZMA Members  
Oregon Congressional Delegation  
Oregon Coastal Legislators  
Other Interested Parties