

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON
AMENDMENT 22: LIMITING ENTRY IN THE OPEN ACCESS GROUND FISH FISHERY

The Washington Department of Fish and Wildlife (WDFW) has reviewed the update of the open access permitting issue and the preliminary range of alternatives developed by the California Department of Fish and Game (Agenda Item E.4.a, Attachment 2), and offers the following comments and suggestions for Council consideration.

As described in the document, most of the open access fishery participation in Washington is in the sablefish daily trip limit (DTL) fishery. In addition, in the past decade, there have been a few vessels that have participated in a targeted open access fishery for spiny dogfish; however, participation in this fishery has declined in recent years.

Also, based on the analysis in the document, the total number of vessels participating in Washington open access fisheries has ranged from 86-112 vessels over the past six years, with an average of 96.

As stated in Attachment 2, one of the primary goals of the Open Access Limitation initiative is to closely align the number of participating vessels with the amount of resource available for harvest. As noted above, Washington's open access fishery is essentially the sablefish DTL fishery. The sablefish resource is healthy and the stock abundance is projected to be increasing. The open access fishery has a direct allocation of sablefish and is managed under a separate open access sablefish quota; therefore, relative to the sablefish resource, there does not appear to be overcapacity within the Washington open access fleet. Given that the open access fishery is viewed as one sector, WDFW recommends that the following alternatives be included for analysis:

1. As an initial step, create a federal permit requirement to participate in the open access fishery, but do not limit the number of participants.
2. Require a federal permit to participate in the open access fishery, and place a moratorium on the number of permits that can be issued and include a geographic restriction. The number of permits issued should reflect average effort. As an example, if the number of permits for Washington were 96, qualifying criteria could be established such that the 96 vessels with the highest amount of open access groundfish landings into Washington during a specified window period would receive permits.

In addition, if an analysis were done that simply compared total landings, by vessel, for various qualifying years, vessels that only participated in the sablefish DTL fishery may be at a disadvantage when compared to nearshore fishery participants. To address this, WDFW recommends that state-specific goals and objectives be developed, which would provide for consideration of state-specific qualifying criteria.

Finally, WDFW believes an alternative should be added that includes full transferability of the permits without an annual minimum landing requirement.