

WASHINGTON AND OREGON DEPARTMENTS OF FISH AND WILDLIFE JOINT  
REPORT ON AMENDMENT 22: OPEN ACCESS LICENSE LIMITATION

The Washington Department of Fish and Wildlife (WDFW) and the Oregon Department of Fish and Wildlife (ODFW) would like to offer the following comments and recommendations relative to the alternatives describes in the Preliminary Draft Environmental Assessment (EA) for Amendment 22 (Agenda Item F.4.a, Attachment 1):

1. Chapter 2, Description of the Alternatives, Section 2.3 (p. 26), WDFW and ODFW recommend revising Alternative 3 to reflect a fleet size goal that includes permit holders who participated in the open access fishery in recent years. Fleet size goals and qualifications for B permits would be based on one of the following sub-options:
  - a. Average number of vessels for 2004-06 period; permits would be issued to the top producers in order of ranking (e.g., if total fleet size is 680 vessels, then permits would be issued to the 680 vessels with the highest landings during the 2004-06 period)
  - b. Number of vessels that participated in 2006 (713); permits would be issued to those vessels that had a minimum of one delivery in 2006.
  - c. Number of vessels resulting from one of the following participation requirements:
    - i. Minimum of one delivery in 2004 or 2005 or 2006
    - ii. Minimum of one delivery per year in two of the three years (2004-2006)
    - iii. Minimum landings of 100, 500, 1000, or 2000 lbs. of groundfish excluding nearshore species in one year in 2004, 2005, or 2006
    - iv. Minimum cumulative landings of 100, 500, 1000, or 2000 lbs. of groundfish excluding nearshore species across the three-year period (2004-2006)

The other components of Alternative 3 would remain as specified in the draft EA.

2. A comprehensive review of the performance of the open access fishery would occur seven years after the date of implementation; participation levels would be evaluated at that time, and reductions may be taken if deemed necessary.
3. Across all alternatives, analyze individual permit holders (not vessels or vessel owners) for Washington participants. We understand that this data may not be readily available in the PacFIN database; however, WDFW could provide the data for this analysis. Across all alternatives, analyze vessel history and vessel owner history for Oregon participants. Vessel history information resides in the PacFIN database. Vessel owner history information can be provided by ODFW.

4. To recognize and respect the differences in nearshore fishery management plans and resulting fishing opportunities among the states, WDFW and ODFW continue to advocate including state-specific objectives in the EA. The intent is to allow each state to select the alternative that best achieves their state-specific objective while still achieving the overall goals for the amendment. For example, if one state has a need to reduce open access participation to a greater degree than another state (e.g., to achieve an economic viability goal), then that option would be available when the Council considers final action on this matter. This option would only apply to Alternatives 3-6 (i.e., those alternatives with a limitation on the number of permits).
5. Finally, WDFW and ODFW continue to be concerned by the allocative implications of the different alternatives and how they will be analyzed. These items were briefly touched upon at the last Groundfish Allocation Committee (GAC) meeting; however, the information and time available were not sufficient for a thorough discussion. In order to have that much-needed discussion, WDFW and ODFW would support scheduling this item on a future GAC agenda prior to final action by the Council.