

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE (WDFW) REPORT ON
 AMENDMENT 20: TRAWL RATIONALIZATION ACCUMULATION LIMITS

With regard to the motions in November 2008 relative to accumulation limits in the mothership whiting sector, the Washington Department of Fish and Wildlife would like to offer the following recommendations:

Whiting Catcher Vessel (CV) Ownership Limit in the Mothership (MS) Sector

The CV ownership limit addresses the issue of an entity owning an “excessive share” and the need to provide some room for growth, new entrants, and to promote efficiency. The motion adopted by the Council in November did not address this.

The following data was excerpted from Table A-74 in Appendix A. (p. A-260):

Stock	1994-2003		2004-2006	
	90 th Percent	Max	90 th Percent	Max
Pacific Whiting - Mothership Sector	11.3	18.5	16.4	28.9

These data indicate that the maximum amount landed by a CV during the qualifying period (1994-03) was 18.5% of the MS total and that a limit of 11.3% would accommodate 90% of the CV activity. For the more recent time period, it is our understanding that a CV landed 28.9% of the MS total in one year between 2004 and 2006 and that 16.4% would accommodate 90% of the CV activity during that time.

It is important to note that while one of the CVs has landed quite a bit more than the others, the amount that that CV permit will receive for initial allocation is considerably less than the percentage it has landed recently. In reviewing Figure B-2 in Appendix B. (p. B-56), it would appear that, in terms of initial allocation, the maximum that any entity would receive is 9.5%, based on the qualifying period.

Therefore, WDFW would recommend that the CV permit ownership limit be set at 15%. We believe that this would prevent an entity from owning a share of whiting that would be considered “excessive,” while providing some room for growth by all CV permit holders from their respective initial allocation amounts.

Whiting Catcher Vessel Usage Limit in the Mothership Sector

The CV usage limit issue is slightly different as it attempts to strike a balance among three factors: 1) efficiency in the fleet; 2) minimum number of vessels needed to prosecute the fishery; and 3) the potential effect of the usage limit on price negotiations. Having a higher limit provides for more efficient harvest practices; however, having a limit that is too high could result in too few CVs available for MS operations and could provide leverage for CVs to negotiate higher prices. In talking with some of the MS companies, there seemed to be agreement that each MS needed a minimum of two CVs to operate continuously.

The MS usage (processing) limit adopted by the Council in November was 45%, which ensures that there would be a minimum of three MS processors participating in the fishery in a given year. This would translate into a minimum of six CVs (two CVs for each of the three MS processors), which would suggest a limit of 17% if all CVs achieved the maximum usage amount. However, given the diversity of the fleet, it is not anticipated that this would occur. Also, 17% would likely be too restrictive since one CV has used up to 29% in the recent time period.

Therefore, based on the data in Table A-74 and Figure B-2, WDFW would recommend a CV usage limit of 25%, which would strike a reasonable balance of promoting efficiency and ensuring that there would be a minimum amount of vessels available for harvest.