

WEST COAST SEAFOOD PROCESSORS ASSOCIATION

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April 1, 2016

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chair Lowman:

The following comments are submitted by the West Coast Seafood Processors Association (WCSPA) for consideration under April 2016 Council Agenda Item F.3 (Groundfish) – *Final Action to Adopt Biennial Specifications*. WCSPA represents shoreside processing companies and related businesses located in California, Oregon and Washington. Our members process about 80 percent of the groundfish landed on the West Coast. Our comments relate specifically to the Council’s selection of 2017-2018 harvest specifications for canary rockfish.

WCSPA strongly supports the no action alternative for the 2017-2018 canary rockfish annual catch limit (ACL) because it is based on the best scientific information available, and it is consistent with the harvest specification framework described in Chapter 4 of the Pacific Coast Groundfish FMP. According to the most recent stock assessment, canary rockfish spawning stock biomass is estimated to be above the B_{MSY} proxy of $B_{40\%}$, and has therefore achieved the rebuilding target. This stock assessment was reviewed and endorsed by the Council’s Scientific and Statistical Committee (SSC) in its [June 2015 report to the Council](#). Further, the SSC reviewed and endorsed the default harvest control rules (HCRs) for the 2017-2018 canary overfishing limits in its [September 2015 report to the Council](#):

The changes in projection methodology used to compute the OFLs have been endorsed to provide the most risk-neutral OFLs possible given the capacity of the science centers to provide these updates. Further, the assumption of ACL removals assuming default harvest control rules in projecting 2017 and 2018 OFLs is consistent with the new Amendment 24 framework.

The scientific information available indicates that there is no reason to divert from the process for determining 2017 and 2018 harvest specifications for canary rockfish, which was just recently adopted by the Council in 2015 (Amendment 24). Based on the analyses provided in the *2017-2018 Groundfish Harvest Specifications* document ([Agenda Item F.3, Attachment 1](#)), the reductions from the ACL under default HCR proposed in Alternatives 1 and 2 appear to be arbitrary and unnecessary. Under the base case (most likely) scenario, the proposed reductions in canary ACL result in very little additional spawning biomass in 2017 and 2018 (see information from Table 2-9 provided on the following page). Under Alternative 2, for example, an ACL in 2017-2018 that is 67% lower than the no action alternative produces a spawning biomass that is projected to be only 6% higher at the start of 2019 (4,281 mt vs. 4,037 mt). Resulting depletion rates are also very similar under each alternative. Under either Alternative 1 or Alternative 2, the benefits of the increased spawning biomass do not appear to outweigh the costs of reduced fishery yield.

Table 2-9. Projected harvest specifications, spawning biomass and depletion under the alternatives analyzed for canary rockfish using the base case model in the 2015 assessment.

Year	No Action (Default HCR)				Alt. 1 (50% of No Action ACL)				Alt. 2 (33% of No Action ACL)			
	OFL (mt)	ACL (mt)	Spawning biomass (mt)	Depletion	OFL (mt)	ACL (mt)	Spawning biomass (mt)	Depletion	OFL (mt)	ACL (mt)	Spawning biomass (mt)	Depletion
2017	1,793	1,714	4,261	56.9%	1,793	857	4,261	56.9%	1,793	566	4,261	56.9%
2018	1,661	1,526	4,147	55.4%	1,735	763	4,240	56.6%	1,760	504	4,272	57.0%
2019	1,579	1,415	4,037	53.9%	1,714	707	4,219	56.3%	1,761	467	4,281	57.1%

Under the no action alternative for the 2017-2018 harvest specifications, the risk of biological harm to the canary rockfish resource is very low. Under the other alternatives under consideration, however, the risk of economic harm to fishery participants is much higher. This became very apparent in November 2015 when the F/V Seeker encountered a significant tow of canary rockfish while targeting yellowtail rockfish; the F/V Seeker is now prohibited from participating in the shorebased IFQ fishery for all of 2016. While this incident serves as another indication of the health of the canary resource, it is also a situation that the management system should strive to minimize, to the extent possible. Implementing the default HCR for canary rockfish in 2017-2018 would help to reduce the possibility of similar occurrences.

Thank you for your consideration of our recommendations. We urge the Council to support the best scientific information available and adopt the no action alternative for specifying the 2017-2018 canary rockfish ACL.

Sincerely,



Lori Steele
Executive Director