



Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Or 97221

RE: F.6.b. Biennial Harvest Specifications and Management Measures for 2017-2018 Groundfish Fisheries

March 17, 2016

Dear Chair Lowman & Council Members

Please accept these comments on the 2017-2018 groundfish specifications on behalf of Midwater Trawlers Cooperative (MTC) and United Catcher Boats (UCB). MTC and UCB collectively represent the majority of catcher vessels that participate in the at-sea and shoreside sectors of the Pacific whiting fishery.

We write to you today to urge you to retain the "Transfer of Shorebased Quota Pounds to the Mothership Sector" in the list of new management measures and identify this measure as a Preliminary Preferred Alternative for implementation in 2017. The concept is clearly needed and has broad support, does not appear to jeopardize the January 1 implementation of the regulations, and has the best chance of allowing the mothership sector a reasonable expectation of achieving the whiting OY.

Broad Support

There is no debate over whether the amounts of choke bycatch species currently available to the mothership whiting fishery are inadequate. The Council has already taken several important actions over the last eighteen months to address the lack of bycatch in the mothership sector. The first action was in late 2014 and included an unprecedented emergency Council meeting where more darkblotched rockfish was made available to the at-sea sectors following a premature closure of the mothership sector. The second action was in 2015 and included an inseason transfer of set-aside

darkblotched rockfish to the mothership sector in order to avoid a possible closure of the sector. There is discussion about whether a similar action will be necessary in 2016 to once again avoid premature closure of the mothership sector.

There has also been general agreement and support from the broader trawl industry for this short-term approach to address the issue because it allows mothership participants to access *their own fish* in their shoreside quota accounts rather than reallocating fish off the top and away from the entire shoreside ITQ sector.

Lastly, in October and then again in November, while the Council was narrowing the list of management measures to a reasonable number, a majority of the Council voted to retain this new measure in the analysis for the 2017-2018 specifications process.

Timely Implementation of 2017-2018 Groundfish Regulations

While the analysis has not been released to the public as of today's date, we understand Council and Agency staff has done a fair amount of work on the analysis and that the inclusion of this alternative will not jeopardize the current timeline. Members of the industry have been in contact with Council and NMFS staff to provide information and answer questions specifically related to this concept.

In November 2015 during Council deliberation on the list of new management measures the states of Oregon and Washington offered up their staffs to work on this issue if it lessened the analytical burden on NMFS and Council staff. Further, at the Santa Rosa 3 quota workshop held in late February, NMFS Regional Administrator Will Stelle reported to the participants that NMFS no longer had a human resource issue within the region and that all work was being completed on time and as expected.

Lastly, because the whiting seasons start on May 15th, this concept, if approved, does not need to be effective any earlier than May 15th, 2017. This allows an additional 4.5 months to complete implementing regulations allowing the Council and NMFS to primarily focus on those regulations that must be in place by January 1st.

Justification

As noted above at the November PFMC meeting a majority of Council members voted to include a new management measure developed and proposed by our organizations as a way to mitigate the impacts of exceedingly constraining small bycatch amounts available to the mothership sector of the whiting fishery. To help alleviate this problem and avoid premature closures like the one that occurred in 2014, the mothership sector developed a concept that allows voluntary limited transfers of the four choke species (Canary, Darkblotched, and Widow rockfish and Pacific Ocean Perch) from mothership participants' shoreside IQ accounts to the at-sea whiting cooperative on an annual basis. In this way

the mothership participants are essentially solving their problem with “their own” fish that was allocated to them through the distribution of buyback-associated species for which they are paying 5% of their annual ex-vessel value for through buyback loan payments. Current regulations prohibit Whiting permit holders/vessel owners to transfer some portion of their Shoreside IQ species to their Mothership Whiting fishery.

In developing this shoreside to mothership choke species transfer proposal, we wanted to ensure that there would be no negative impact on the shoreside fisheries (both Whiting and non-Whiting). Since implementation of the ITQ program large amounts of choke species remained unused in the shoreside fishery participant’s Vessel Use Accounts and this request would still leave ample amounts of fish in the shoreside sector.

We believe that the analysis will demonstrate that this alternative will provide great benefit to the at-sea mothership sector in their ability of achieving OY while adding little to no risk to the shoreside ITQ sector’s ability to access fish. This is an interim approach to fix the problem of inadequate allocation of bycatch species for the mothership sector. In November the Council indicated a preference for implementing this interim concept subject to the Council’s 5-year review of the trawl ITQ program.

Representatives from MTC and UCB have collaborated with Council staff between the November meeting and now, responding to questions and informational requests related to this concept. We are available to continue this dialog and provide any additional information or materials requested. Once the analysis is made public in the April Briefing Book we will provide supplemental public comment and testimony and work with Council staff to refine the analysis if necessary.

Thank you for your consideration and continued dedication to sound management of the west coast groundfish fisheries.

Sincerely,



Brent Paine
United Catcher Boats



Heather Mann
Midwater Trawlers Cooperative