



Pacific Whiting Conservation Cooperative

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A Partnership to Promote Responsible Fishing

June 13, 2016

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

RE: June 2016 Agenda Item G.2, Amendment 21 At-Sea Sector Allocation Revisions

Dear Chair Lowman and Council Members:

I am writing on behalf of the Pacific Whiting Conservation Cooperative (PWCC) to provide comments about the problematic at-sea sector allocations of rockfish, the need for a solution in the form of increases to these allocations, and strong support for the Fishery Management Plan amendment process that was initiated via Council action at the April 2016 meeting. The PWCC is a voluntary cooperative comprised of the three companies that participate in the catcher-processor sector of the Pacific whiting fishery. PWCC member companies engage in all aspects of the fishery, including harvesting and processing, and are, therefore, directly affected by the current problem and in dire need of the solution embodied in the FMP amendment process.

The Council is fully aware that the allocations of widow rockfish, canary rockfish, darkblotched rockfish, and Pacific Ocean perch (POP) are too low and creating economic havoc in the two at-sea whiting fishery sectors. This issue has been in front of the Council several times in recent years and the Council has demonstrated a strong desire to fix the problem. Increased allocations of widow rockfish and canary rockfish to the catcher-processor (CP) and mothership (MS) cooperatives will occur through the 2017/2018 groundfish management specifications process. The PWCC cannot overstate our gratitude for this action taken by the Council.

The next step is to move forward the action initiated at the April 2016 Council meeting. This action would (1) increase the allocations of darkblotched rockfish and POP to the CP and MS cooperatives and (2) modify how these allocations are managed from hard caps (that close the fishery upon attainment) to set asides (soft targets that are used by the cooperatives to self-manage, but do not close the fishery upon attainment). The PWCC greatly appreciates efforts by Washington Department of Fish and Wildlife (WDFW), Oregon Department of Fish and Wildlife, and Council and National Marine Fisheries Service (NMFS) staff in developing information for consideration and action at the June 2016 Council meeting. The WDFW Report (Agenda Item G.2.a, WDFW Report, June 2016) provides an accurate and well-articulated problem statement. The WDFW Report also provides a clear solution. The PWCC recommends the Council adopt Alternative 1 as the Preliminary Preferred Alternative at the June 2016 Council meeting.

As noted in the WDFW Report, “On the issue of the option of allocations (Option A) versus set-asides (Option B), the Council’s motion stated a preference for the latter but expressed the intent to keep the amounts as allocations if the change to set-asides would compromise implementation of the change in time for the 2017 fishing season.” The PWCC has stated (in public testimony at the April 2016 Council meeting) a strong preference for the use of set asides to manage incidental catch of these species because it provides a better means to optimize our whiting harvest and minimize our incidental catches of all non-target species. However, we agree that getting increased amounts of darkblotched rockfish and POP by the start of the 2017 whiting season is paramount. We presume forthcoming staff analysis will help to elucidate the choice between sub-options A and B, and will provide additional comments as warranted.

As the Council considers taking action, it is critical to recognize that this action would not create a conservation risk for either darkblotched rockfish or POP. Since 2011, annual catches of both species have been well below their respective annual catch limits (ACL). The following data is from the 2011-2014 Annual Total Mortality Reports:

Darkblotched Rockfish

Year	Total Catch	ACL
2011	133	298
2012	105	296
2013	133	317
2014	140	330

POP

Year	Total Catch	ACL
2011	62	180
2012	56	183
2013	58	150
2014	56	153

The total increased amounts of darkblotched rockfish (22.0 mt) and POP (17.6 mt) would not cause a risk of exceeding either ACL. However, these increased amounts would be of great benefit to the CP and MS cooperatives.

Current conditions in the fishery are far from optimal. Early in the 2016 season, the CP sector found relatively good fishing with low bycatch in an area off southern Oregon. However, over time, as the whiting continued their annual northward migration, catch rates dropped to economically inefficient levels. Fishing was clean, but it was far from good. The CP fleet then moved north to relatively good fishing off Washington, but in areas with a much greater likelihood of encountering darkblotched rockfish and POP. As the CP fleet finishes the spring fishery, every tow is a gamble. We have been fortunate to date and no lightning has struck, but it is a stressful time on the grounds.

While lightning strikes have been avoided, an even greater problem is caused by low level, chronic catches of darkblotched rockfish and POP. We estimate that if each tow had four darkblotched rockfish we would attain our darkblotched rockfish allocation well before we catch our whiting. Under the current system, if this happens we must stop fishing even though there is no conservation problem, resulting in tens of millions of dollars in foregone revenue and the loss of nearly a thousand family wage jobs. Therefore, to save our fishery, the CP fleet endeavors to find areas where there is little to no darkblotched rockfish or POP. We are forced to choose economic inefficiency to avoid fishery closure. This comes at a significant cost. Moreover, it extends our time on the water; more time means more tows, which means more chances for

unintended consequences. The Council has the opportunity to address this problem and we respectfully ask you to help us.

The CP sector takes action to voluntarily avoid fishing near the sea floor in sensitive habitats to help ensure protection of Essential Fish Habitat. We generally fish outside of 150 fathoms to minimize our impacts on endangered and threatened salmon. We take voluntarily action to minimize our incidental catches of roughey rockfish and spiny dogfish shark because the Council has noted concern about impacts on these species. We also endeavor to target older age class whiting because it is an important consideration in the Hake Treaty process, and because product yields are higher from larger hake. These efforts are not easy, but we do them because we recognize that we need to help the Council and NMFS achieve the goal of balancing sustainable fisheries while conserving living marine resources. Adopting alternative 1 (as presented in the WDFW Report) will help us to optimize our fishery and it will do so without a conservation risk.

Thank you for considering our request. The PWCC stands ready to assist the Council and NMFS by any means necessary to ensure timely implementation of this critically needed solution.

Sincerely,



Daniel A. Waldeck
Executive Director