



West Coast Seafood Processors Association
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September 5, 2016

Mr. Herb Pollard, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chairman Pollard:

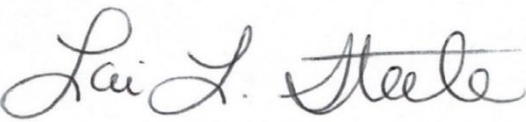
The West Coast Seafood Processors Association (WCSPA) submits the following comments for consideration under Agenda item F.1 at the September 2016 Council meeting – *National Marine Fisheries Service Report (Groundfish)*. We are extremely concerned about the timing for implementation (and potential delay until Summer 2017) of the Council’s *Gear Changes for the Pacific Coast Groundfish Fishery’s Trawl Catch Share Program*, for which final alternatives were selected by the Council at its March and June 2016 meetings. We encourage the Council discuss this issue under Agenda Item F.1 and/or G.6 (*Future Council Meeting Agenda and Workload Planning*). The Council’s selection of final alternatives for the gear change package was based on a thorough analysis of impacts and an almost-complete (draft) Environmental Impact Statement. The majority of the technical work required to support and approve this action has long been completed. Therefore, it is problematic that a lack of resources/manpower may preclude these regulatory changes from becoming effective until sometime during Summer 2017.

We recognize that the Council cannot provide resources to NMFS, nor can it require the Agency to direct its own resources/staff any particular way. However, given the limited resources available and number of rulemakings in progress (see [Agenda Item F.1.a NMFS Report 2](#)), the Council could provide recommendations to NMFS regarding short-term priorities for rulemaking and implementation, with consideration to timing and the needs of the groundfish fishery. At the very least, it would be helpful to further clarify the staff time/resources that would be necessary to expedite rulemaking for the gear change package. Approval of the document and rulemaking to implement the regulatory changes should not take up to a year or more.

As the Council is aware, the gear change package is critical to increase flexibility and fishing opportunities for the groundfish fleet and bring the trawl catch share program one step closer to achieving its objectives. Timing for implementation of these regulatory changes is critical; increased annual catch limits (ACLs) for rebuilding/rebuilt rockfish, starting January 1, 2017, will provide the first opportunity for a directed rockfish fishery in many years. The industry *needs* the flexibility afforded in the gear change package, particularly during the first few months of the year, to take advantage of the increased ACLs and to plan business operations accordingly while trying to avoid problems associated with a mid-year market flood.

Thank you for your continued attention to this important issue. We appreciate the opportunity to discuss this issue further with the Council and NMFS at the September Council meeting.

Sincerely,

A handwritten signature in black ink that reads "Lori L. Steele". The signature is written in a cursive style with a large initial "L" and a distinct "L" in the middle.

Lori Steele
Executive Director