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Subject: F.7 Public Comment
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

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

Dear Chair Lowman:

I am writing on behalf of Phoenix Processor Limited Partnership (PPLP), owner and operator of two mothership processors in the at-sea whiting fishery. Many of the partners in PPLP also own and operate catcher vessels and permits in the whiting fishery. My comments are in support of efforts to mitigate impacts to the mothership sector from the current hard caps that were imposed under Amendment 21. In particular, I want to describe some of the day-to-day operations in the 2016 mothership whiting fishery to support the analysis.

As you were informed in the June Council meeting, a series of significant bycatch events (mostly POP) severely impacted the mothership whiting sector. Since then, MS CV boats have avoided POP mainly by avoiding whiting. That the CV boats are moving quite a bit should not be interpreted lightly – they have been moving all the way to the California border. The extremely low POP amounts make it untenable for the MS CV boats to focus their fishing in areas where whiting congregate, extending their time on the water, increasing risk, and eroding value.

In the current trip for PPLP's processing ship, the MV Excellence, some of the CVs thought they could safely get some of the whiting in deep water off of Yellowtail Canyon, off the northern coast of Washington. It wasn't long before a bycatch event happened where one tow came up with 146 kg of POP and another with 746 kg of widow. The CVs were well off the edge at the time. The POP hit was in 275 fathoms of water with the net depth at 95 fathoms; the widow hit was in 675 fathoms, net depth 95 fathoms. This was not a case of towing up the ditch or on the bottom. These were also both daytime hauls. As overfished species stocks have improved, bycatch has become more unpredictable as the rockfish are simply found more often in times and areas where they have not traditionally been encountered.

This bycatch event sent the CVs on a search back to the California border, looking for fishable aggregations along the way and finding none. When they got to the California border they made multiple "goose egg" water hauls before coming up with tows that took three times as long to get a full bag. The fish were 1/3 smaller than what they found up north.

Extra towing time and small fish have impacts. More fishing time is more chance for unfavorable bycatch events. Bycatch reports show more Chinook bycatch in the south, and as we enter September we can anticipate more. But Chinook does not shut down the CVs so they are making the rational expected tradeoff in their bycatch avoidance decisions. Small fish is also a problem. Small fish diminishes the value of the products that can be made. A higher percentage goes to fish meal, less HGT can be made that meets market spec, we get a lower recovery rate on surimi. Getting less value for the tonnage lowers the revenue to distribute to the CVs and return to their communities. Small fish also means more individual fish are caught per metric ton, so there is an impact on the resource.

I know some people like to interpret all this as the fishermen just want to make more money. Well, they are certainly not doing what they do for their health, not when fishing under these stressful conditions. But I think it is important for folks to realize what the impacts are of moving to avoid bycatch. Taking a lot longer to catch fewer, smaller fish at greater expense and higher risk of bycatch of ESA-listed species does not sound like a successful management strategy to me. These guys are doing the best that they can but it has not been working.

The Amendment 21 allocations are ripe for reconsideration in light of the five-year review of the trawl rationalization program. I support the Council's efforts to provide sufficient bycatch amounts to allow the whiting fishery to achieve its full potential. In the meantime, thank you for the support provided in the June Council meeting by freeing up stranded research allocations, a move that provides some relief in 2016, and thank you for considering the request to modify the nature of the Amendment 21 allocations to be managed as a set aside for an action to provide further relief in future years.

James

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