



West Coast Seafood Processors Association
650 NE Holladay Street, Suite 1600
Portland, OR 97232
(503) 227-5076

February 23, 2018

Phil Anderson, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: Agenda Item H.2 Trawl Catch Shares – Gear Switching and Trawl Sablefish Area Management

Dear Chairman Anderson:

On behalf of the West Coast Seafood Processors Association (WCSPA), I am writing to urge the Pacific Fishery Management Council to move forward as expeditiously as possible with the development of management action to address problems associated with sablefish gear switching in the West Coast groundfish fishery. This is an extremely high priority issue for the groundfish trawl fishery and must be addressed to meet the goals and objectives of the catch shares program established in Amendment 20.

Through extensive discussion over the last two years, it has become evident that problems associated with gear switching are significant enough to warrant immediate attention by the Council (for example, see [WCSPA comments from November 2016](#) – p. 24/27). The groundfish Community Advisory Board (CAB; see reports from [June 2017](#), [September 2017](#), [November 2017](#)), Groundfish Advisory Subpanel (GAP; see reports from [April 2017](#), [June 2017](#), [September 2017](#), [November 2017](#)) and the public (see extensive public comments from November 2016 – November 2017) have already spent a great deal of time debating this issue and laying the groundwork for the Council to develop a management action. While there is clearly not consensus among stakeholders regarding how to address this issue, there has been adequate discussion to justify moving forward with the process. Given all the information available at this time, as well as more than two years' worth of input from affected stakeholders and the public, the Council should feel comfortable developing a management action **now**; however, we recognize the decisions that need to be made will not be easy.

WCSPA recommends that management action to address gear switching be developed by the Council according to the following schedule:

- June 2018 – Adopt Purpose and Need/Range of Alternatives
- September 2018 – Adopt Preliminary Preferred Alternative
- November 2018 – Adopt Final Preferred Alternative

If the Council moves forward according to the schedule outlined above, there would be no need to reconvene the CAB to further address this issue (although additional input from the CAB may still benefit the process). Consistent with the Council's process for developing management actions, the

GAP and the Groundfish Management Team (GMT) would meet in June and develop recommendations regarding the range of alternatives for the Council to consider. WCSPA supports this process and encourages the Council to move forward utilizing the GAP and GMT to develop this action as soon as possible. Under no circumstance would we support reconstituting the Groundfish Allocation Committee (GAC) for this purpose. This is not an appropriate issue for the GAC to address, nor is there time to reconstitute this group to begin the process of debating this issue.

At the March 2018 Council meeting, during Agenda Item C.7 (Future Council Meeting Agenda and Workload Planning), we recommend the Council schedule adequate time on the June 2018 meeting agenda to adopt a purpose and need statement and a range of alternatives for further GMT analysis. Given the significant time already spent discussing this issue, this could likely be achieved with 4 hours of time on the Council floor in June.

Thank you for your consideration of our recommendations and your attention to this very important issue. WCSPA is committed to working through the Council process to address this problem in the most expeditious manner possible.

Sincerely,

A handwritten signature in black ink that reads "Lori L. Steele". The signature is written in a cursive, flowing style.

Lori Steele
Executive Director

guarantee that the fish would go to trawl only fishermen. Because the value of the fish is greater in the fixed gear fishery, FG fishermen that don't currently fish a vessel cap would then fish up to a limit, thereby redistributing the fish with no rational basis. Or would the Council say, in order to get more sablefish to trawl only fishermen, we're going to reduce the vessel cap and reallocate this fish to trawl only vessel. And on what basis? Every trawl only vessel of the 75 currently participating would be given 4000 more pounds?

Finally from our personal perspective—we have fished up to a quota share limit every year we've been able to find trawl fishermen willing to lease us their fish at a market price we are willing to pay,. If you reduce what we can catch from 240,000 pounds to 160,000 pounds, that's a \$250,000 hit to one business, without solving a problem.

Michele Longo Eder

Michele Longo Eder
F/V Timmy Boy
Argos, Inc.
P.O. Box 721
Newport, OR 97365
[541-270-1161](tel:541-270-1161) cell
michele@michelelongoeder.com
