

October 23, 2018



Agenda Item B.1.b
Supplemental Public Comment 5
November 2018

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

Re: Agenda Item B.1 Comments on Non-Agenda Items: October 2018 SaMTAAC Meeting

Dear Chair Anderson and Council Members:

As we were not able to view the SaMTAAC Committee report prior to the deadline for the November 2018 PFMC meeting we respectfully submit the following comments for your consideration:

**MINORITY STATEMENT
Per Council Operating Procedure 8**

Re. Ms. Sommer & Mr. Dooley SaMTAAC Alternative:

Exemption expiration options:

[Sub] Option 4: Exemption expires after X years: (for analysis X = 5,10, 15)

The Council charged the SaMTAAC to: 1) identify “obstacles to achieving the goals and objectives of the catch share plan related to under attainment of non-sablefish trawl”; and 2) develop options to overcome those obstacles, “including but not limited to, actions that may modify rules for gear switching by trawl permit holders and QP leasing to vessels using fixed gear[.]” The enumerated goals of the trawl catch share plan include “increas[ing] net economic benefits” and “provid[ing] for full utilization of the trawl sector allocation.”

The SaMTAAC has selected several preliminary options for further analysis ahead of its next meeting. Included among those is a “sub-option” included in the Sommer/Dooley alternative that calls for “phasing-out” gear switching over a period of a range of 5 to 15 years. The SaMTAAC discussed the importance of evaluating this sub-option at its October 2018 meeting, and was assured by the Chair and Council staff that the upcoming analysis will evaluate the impacts of this sub-option on economic performance and attainment in the trawl fishery as relates to the Goal and Objectives of the Amendment 20 Trawl ITQ program.

It is critically important that the analysis do so. Indeed, the upcoming analysis should go even farther. Meaningful analysis of any issue requires thorough and robust consideration of all

October 23, 2018



options. Accordingly, in order for the SaMTAAC and Council to meaningfully evaluate recommended proposals, the analysis should evaluate the economic performance of the trawl fishery in the analytical context of an immediate cessation of gear switching by fixed gear vessels that do little or no trawling. This analysis should seek to accurately portray the effects cessation would have as relates on all facets of the program's Goal and Objectives, but in particular; "full utilization of the trawl sector allocation" and Objective 6 "Promote measurable economic and employment benefits through the seafood catching, processing distribution elements and support sectors of the industry".

While such immediate restriction may not be practically feasible to implement, only by evaluating economic performance and attainment of the fishery in the absence of gear switching can the SaMTAAC and Council adequately evaluate proposed actions to *improve* economic performance and attainment in the ITQ Trawl fishery going forward.

This analysis of the immediate cessation of ITQ sablefish harvest by primary fixed gear (non-trawl) vessels needs to be coupled to an evaluation of rebuilding the lost markets, skilled work force and infrastructure that has eroded since implementation of the ITQ program. Two major processors have now stated they are ready to begin this task if there is assurance that we can plan on the full supply of necessary sablefish bycatch to harvest these underutilized species. For this reason, the analysts must look at economic outcomes over a multiyear period of no less than five years.

Thank you.

Sincerely,

Handwritten signature of Mike Okoniewski in blue ink.

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