

9/13/2019

**NATIONAL MARINE FISHERIES SERVICE (NMFS)
REPORT ON THE
PURPOSE AND NEED STATEMENT**

At its May 2019 meeting, the Sablefish Management and Trawl Allocation Attainment Committee (SaMTAAC) developed the following purpose and need statement:

Action is needed to ensure that gear switching does not impede the attainment of other individual fishing quota (IFQ) allocations in the north with trawl gear. The purpose of this action is to:

1. limit the catch of sablefish IFQ pounds north of 36° N. lat. with fixed gear in a fair and equitable manner *and/or*
2. encourage utilization of sablefish south of 36° N. lat.

Item 2 of the purpose should be considered to include both utilization of southern sablefish allocation within the southern area and through mechanisms that would allow a portion of that allocation to be caught in areas north of 36° N. lat.

The purpose and need statement is a critical guide that sets the stage for the analysis of an action. Strong purpose and need statements define the range of alternatives considered and strike a balance between not being too broad or too narrow. Purpose and need statements should be able to answer key questions, including: what is the problem, why are we taking action, what are the objectives of the action (solution), and what are we trying to achieve. After internal discussions with our SaMTAAC action team, including our National Environmental Policy Act (NEPA) coordinator, we believe the Committee's purpose and need statement could be enhanced and offer the following for consideration. We built off the direction outlined by the Committee in May and added additional elements, including further detail on the need for action, the relevant statutory authorities, and a link to FMP and Amendment 20 goals and objectives. Our intent is to bolster the backbone that is the purpose and need statement so that the alternatives can be effectively compared and the projected effects of the alternatives can be measured.

Draft Purpose and Need Statement (NMFS version)

This action is needed because the Shorebased Individual Fishing Quota (IFQ) Program has underattained most of its allocations since the inception of the program in 2011. One cause of underattainment for some northern stocks may be the provision within the Shorebased IFQ Program that allows participants to use fixed gear to harvest their individual allocations. Specifically, participants engaging in gear-switching are acquiring northern sablefish quota pounds and quota shares that may otherwise be used by trawl gears to take sablefish along with

other IFQ species. Working within the guidance and authority provided by the MSA (§ 303A(c))¹, the purpose of this action would be to limit northern sablefish gear switching from impeding the attainment of northern IFQ allocations with trawl gear.

This action is also needed because the Shorebased IFQ Program has underattained several of its southern allocations, specifically sablefish south of 36° N. latitude. Sablefish is managed under a coastwide overfishing limit (OFL) and acceptable biological catch (ABC) but the annual catch limit (ACL) is split into two management areas, north and south of 36° N. The Shorebased IFQ allocation and ACL for sablefish south of 36° N. latitude are underattained due to declining gear switching vessel participation in this area since rationalization², limited DTS trawling in this area³, and lack of market and infrastructure⁴. The purpose of this action would include encouraging utilization of sablefish south of 36° N. latitude within the current management area and exploring mechanisms that would allow a portion of that allocation to be caught in areas north of 36° N. lat.⁵

These separate underattainment issues prevent the Shoreside IFQ Program from being able to meet Management Goals 2 and 3 of the Pacific Coast Groundfish Fishery Management Plan (FMP) which respectively seek to maximize the value of the groundfish resource as a whole and to achieve the maximum biological yield of the overall groundfish fishery. Additionally, this action would seek to improve program towards the goal of Amendment 20 to the FMP, which created the Shorebased IFQ Program, of providing for full utilization of the trawl sector allocation.

¹ Section 303(A)(c) of the MSA sets forth elements defining the creation of limited access privilege programs, including the promotion of fishing safety; fishery conservation and management; and social and economic benefits.

² See page 163 of the [Trawl Rationalization Program 5-Year Review](#) (PFMC/NMFS 2017).

³ See page 151 of the [Trawl Rationalization Program 5-Year Review](#) and Table 68 (PFMC/NMFS 2017).

⁴ See page 249 of the [Trawl Rationalization Program 5-Year Review](#) (PFMC/NMFS 2017).

⁵ As of the May 2019 SaMTAAC meeting, alternatives to address this need are on hold.