



Mr. Phil Anderson, Chairman,
Sablefish Management and Trawl Allocation Attainment Committee (SaMTAAC)
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

10/02/2019

Dear Chairman Anderson and SaMTAAC Members:

I am writing this letter on behalf of the Oregon Trawl Commission (OTC) to submit our comments regarding the SaMTAAC's development of a range of alternatives. As stated in the 09/13/2019 NMFS Report on the Purpose and Need, OTC believes the selected range of alternatives must be broad enough in scope to ensure sufficient analysis is developed to fully address NMFS's outlined concerns. Specifically: "..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 {the} 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."

The mission of the OTC is to enhance the image of the trawl industry and to increase opportunities for profitability through promotion, education, research, and tracking and commenting on legislation and regulations in accordance with the laws and regulations governing the OTC. The level of our commitment to rebuilding markets for trawl-caught groundfish products is hard to overstate. Below are the highlights of some promotional work the OTC has been doing in collaboration with numerous partners:

- Long-term collaborative efforts of Oregon trawlers, processors and NGO partners led to the formation of 501(c)(6) Positively Groundfish, created to promote MSC-certified west coast groundfish. In 2019, it participated in 9 regional and national trade and consumer events, serving more than 20,000 samples of rockfish and sole (primarily, Dover) across the Nation.
- With a total award of nearly \$850K from the U.S. Dept. of Agriculture, the OTC partnered with the Oregon Dept. of Agriculture and Western U.S. Agricultural Trade Association to promote groundfish in the overseas markets with Dover Sole as one of the species with the highest market potential.
- Thanks to collaborative efforts of Positively Groundfish and National Marine Sanctuary Foundation, west coast groundfish fishery comeback story was highlighted at the national event, the annual Ocean Awards Gala during Capitol Hill Ocean Week (CHOW) in June 2019 in Washington DC in addition to trawl-caught rockfish from Astoria, OR being featured as the main course.
- In October of 2019, west coast groundfish fishery and its sustainability story will be featured by the Marine Stewardship Council (MSC) at the Capitol Hill Briefing in Washington DC.

According to Mr. Jeff Lackey's analysis¹ of west coast groundfish historical landing data for Sablefish and Dover Sole, the harvest of bottom trawl dominant species has suffered significant impacts since

¹ Jeff Lackey PowerPoint to the SaMTAAC for the October 2019 SaMTAAC meeting

implementation of the IFQ Trawl Program. When gear switching went into effect, the harvest of trawl caught Sablefish dropped by 44% and Dover dropped by 32%. As pointed out in the EDC report², Sablefish is a principal constraint in harvest of the DTS complex³. Based on this report, it is logical to deduce that when IFQ Sablefish is removed by being utilized by other gear types, the harvesting potential for the entire DTS complex would be compromised, in effect impeding redevelopment of bottom trawl fishery.

Pursuant to the SaMTAAC charge there are three requests the OTC has of the SaMTAAC committee.

1. **Adopt and follow the recommendations of NMFS for the SaMTAAC Purpose and Need for action.**
2. **We request that there be at least one "Trawl centric" alternative in the range of Alternatives.** Currently there are five potential alternatives. In our view, these are all "Fixed Gear centric" which does not meet NEPA guidance to have a contrasting range of alternatives and alternatives that support the Goal and Objectives of the Trawl IFQ program and West Coast Groundfish plan as outlined in the NMFS letter to the SaMTAAC on the Purpose and Need.
3. **There absolutely needs to be economic and/or other analysis that projects the state of economic outputs and effects on the IFQ Trawl Fishery with different levels of gear switching.** This analysis needs to stringently measure this output and effect in the context of the IFQ Trawl Program Goal and Objectives and/or the regulations referenced in the NMFS SaMTAAC before additional metrics are applied.

Identifying a solution in accordance with the recommendations of NMFS for the SaMTAAC Purpose and Need is critical for preserving integrity of the trawl sector, providing for full utilization and ensuring the sector retains its ability (and fair opportunity) to maximize the value of the resource and optimize economic benefit to both the fishermen and the State. Please consider the data and information provided by Mr. Jeff Lackey in the trawl stakeholder request submitted to the SaMTAAC committee, as it underlines the interests and long-term objectives of the trawl industry.

Please feel free to reach me with any questions or concerns.

Thank you for your time and consideration.

Sincerely,



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² West Coast Groundfish Trawl Catch Share Program Five-year Review – Draft August 2017: Link to the report https://www.nwfsc.noaa.gov/news/events/program_reviews/2017/documents/West%20Coast%20Groundfish%20Five-year%20Review%20Full%20Report.pdf

³ "The utilization of sablefish by the fixed gear fishery has contributed to the decrease in attainment of Dover sole and thornyheads by vessels fishing with trawl gear" EDC report p. 3-156; "Sablefish is the principal constraint on DTS trawl fishing..." EDC Report p. 3-147