

DRAFT NARRATIVE AND RATIONALE SUPPORTING A SECOND STAKEHOLDER "GEAR SWITCHING"
REDUCTION ALTERNATIVE AND SUBMITTED TO SaMTAAC FOR ANALYSIS

Sablefish is critical for the restoration of the trawl fishery and achievement of FMP & A20 Goals and Objectives.

NMFS Report on the Purpose and Need Statement (Agenda Item D.2 NMFS Report, October 2019):

1. *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.*
2. *....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.*

Excerpts from August 2017 EDC report:

1. *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: page 3-156*
2. *"Sablefish is the principal constraint of the DTS fishing....." page 3-147*

Present SaMTAAC alternatives would only memorialize gear switching. Some SaMTAAC members have expressed doubts that gear switching is a cause of under attainment. Trawl caught sablefish landings have dropped precipitously from 43.7% to 30.1% on average after 2011. Dover dropped on average by 33.3% when compared to the average of 2007-2010, and 60.5% from 2009. In 2009 we had sales for 25.8 million pounds of Dover, a 97% increase over 2006, the year before the Dover ACL rose to 16,500MT. To do this required 3062MT of trawl caught Sablefish-44.1% of the ACL. We ramped up 97% in 3 years but we had the Sablefish to achieve this gain. We lost a large portion of that trawl sablefish after 2010 averaging only 1509MT since 2011. As stated in the EDC report "*Sablefish is the principal constraint of the DTS fishing*". If it is extracted for fixed gear harvest it is lost as trawl bycatch. We almost doubled production in 3 years. That can be replicated, but the longer we wait the harder it will be.

The above example is backed by expert witness from trawlers and trawl processors. Statements to the effect that I am not sure gear switching is an issue contributing to under attainment should be reversed to the question: How is it that gear switching is the NOT the issue retarding maximized attainment. The data alone proves the case. Look again at the EDC statement. If trawl sablefish is removed from trawl harvest it further constrains the fishery.

In this an important point to remember is that we sacrificed years of harvest to rebuild our stocks. The best value equation for groundfish is the fresh market. However, after eight years of higher costs and inconsistent supply we now need to rebuild the supply chain itself. It is true that the Council cannot rebuild the supply chain, but they can frame regulations that reduce uncertainty and promote

investment. Gear switching inhibits investment and it stymies achievement of the Groundfish FMP and A20 goals and objectives. There is overwhelming evidence that this is the case. Following are some data slides which I will explain as we go through them.

[DATA SLIDES]

In conclusion: Processors, individual fishermen EDF, OTC, OSU, WDFW, and MSC have collaborated the last year to promote west coast groundfish. There have been numerous trade shows, demos, and receptions we have hosted. MSC has featured it as the sustainable fish of the year and it was center of the plate at a recent June gala event in Washington DC. Some of these entities do not support any particular alternative but they all support building a stronger groundfish market and fishery. Industry is working to regain the status groundfish once had but we cannot market items we cannot consistently and dependably supply. We all want to rebuild the trawl groundfish fishery the way we rebuilt the stocks. Like stock rebuilding itself, this is no easy task and we need your support to make it happen.

Our asks:

1. There should be at least 2 alternatives for analysis for which the stated purpose is to clearly reduce the gear switching in a defined manner. We ask that 2 of these include the alternatives labeled Trawl Stakeholder Proposal 2, and the Trawl Stakeholder Proposal. Though different in some areas, the first objective of each to rebuild the trawl fishery and achieve the goals, objectives, and principles as described in the NMFS Report on the Purpose and Need Statement.
2. Adopt the NMFS Purpose and Need Statement provided to the SaMTAAC.
3. Supply robust economic analysis that projects economic outcomes over a suite of alternatives that includes status quo to the total absence of gear switching in a short interval. This is the only way we can juxtapose how well each alternative will fit as a solution to attain the stated goals and objectives for the trawl fishery.

Thank you for your consideration