

WDFW Report on Alternative 1: Gear Specific QP Alternative

The Washington Department of Fish and Wildlife (WDFW) would like to offer the following proposed revisions and comments for consideration for Alternative 1.

1. **Allocation of Gear Specific QP:** Accept Council staff's proposed revision.
 - If there is **no** opt-out, then 70 percent of the QP would be issued as trawl-only and 30 percent as unrestricted (any gear).
 - If there is an opt-out, then 90 percent of the QP would be issued as trawl-only and 10 percent as unrestricted (any gear).
2. **Conversion Date (No Change):** Any remaining unused trawl-only sablefish QP in individual accounts will convert to unrestricted sablefish QP. The trawl-only conversion date will be:

Option A: September 1

Option B: August 1

At the October 2019 SaMTAAC meeting, there had been a question of whether to include a Conversion Date *only* if there is **no** opt-out. However, if an opt-out is selected without a conversion date, our understanding is that this would create two different sablefish categories for carryover, which was one of the issues we were trying to address. If that is correct, then we have two questions and a proposal for consideration:

- a. Is 10 percent unrestricted sufficient for trawlers who may rely on trading sablefish to fixed gear operations during the year in return for other species quota?
- b. Would trawlers see a benefit to having their sablefish carryover be added to their unrestricted quota the following year?

Proposal: If the answer to both of these questions is "yes," then if opt-out is selected, consider applying "conversion" only to carryover QP.

3. **Opt-out Provision with Qualifying Criteria:** Retain description of Opt-out **Option a** and qualification criteria (a trawl permit must land with fixed gear), but replace the six suboptions with:

Option A: between Jan 1, 2011 and Sept 15, 2017 **or** between Jan 1, 2014 and Dec 31, 2018, a minimum of 10,000 lbs of sablefish (former 1.A and 2.A)

Option B: between Jan 1, 2011 and Dec 31, 2018, one landing of fixed gear sablefish

The purpose of having an Opt-out Option is to allow the gear-switching activity that has occurred in the IFQ program since its inception to continue. The purpose of Opt-out Option a specifically is to preserve the gear-switching opportunity for those individuals who invested in this program by purchasing a trawl permit for the purposes of harvesting sablefish with fixed gear. Therefore, increasing the qualifying criteria that would result in excluding individuals who have purchased a trawl permit for the purposes of harvesting sablefish with fixed gear would be contrary to the intent of the option and there does not seem to be any information in the analysis that would justify doing so.

Additionally, WDFW would welcome the SaMTAAC's feedback on Opt-out Option b and how it could be considered in the analysis. The results we are viewing, based on the criteria we suggested in October, show that a lot of QS owners have connections to gear switching. Other criteria for determining opt-out eligibility could be explored. From our perspective, even if Opt-out Option b were not selected for the purposes of applying the Opt-out provision, we believe that the analysis is useful in demonstrating the breadth of trawl IFQ fishery participants who have participated in gear-switching-related activities since the program's inception. As such, we support using that analysis to help describe the scope of individuals who may be affected—directly and indirectly—by this IFQ program change.