

November 4, 2019

Agenda Item H.7.b
Supplemental
Public Comment
November 2019

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

RE: AGENDA ITEM H.7 - GEAR SWITCHING AND SABLEFISH AREA MANAGEMENT UPDATE

Dear Chair Anderson and Council Members:

Re: SaMTAAC Purpose and Need statement from the October 2019 SaMTAAC Report ([Agenda Item H.7.a SaMTAAC Report 1](#)):

“The National Marine Fisheries Service (NMFS) provided further guidance on the construction of purpose and need statements and, based on previous committee work, offered a proposed statement for committee consideration. Working from the NMFS guidance and offered language, the committee developed the following statement.

*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. The underattainment for some northern stocks may be due to the allowance to use fixed gear to harvest shorebased IFQ, **declining trawl vessel participation, and the lack of market and infrastructure**. Specifically, participants engaging in gear-switching are acquiring northern sablefish quota that may otherwise be used by trawl gears; this may lead to uncertainty in trawl access to sablefish, thereby affecting the development of markets and infrastructure. Working within the guidance and authority provided by the MSA (§303A(c))1 and the Pacific Coast Groundfish Fishery Management Plan (FMP) goals and objectives, the purpose of this action would be to keep northern sablefish gear switching from impeding the attainment of northern IFQ allocations with trawl gear, while considering impacts on current operations and investments.”*

Pacific Seafood notes that 3 letters sent to the SaMTAAC committee, representing a majority of active trawl fishers and all major trawl fish processors, including the West Coast Seafood Processors Association, were submitted to the SaMTAAC committee by Mr. Jeff Lackey, the Oregon Trawl Commission, and Pacific Seafood. Each of these letters supported the original content as expressed in the guidance offered by NMFS for SaMTAAC’s Purpose and Need. We appreciate that the SaMTAAC committee incorporated important components of the NMFS guidance into their Purpose and Need statement. However, we would like to call attention to one passage in the SaMTAAC rendition that added the following language.

*“The underattainment for some northern stocks may be due to the allowance to use fixed gear to harvest shorebased IFQ, **declining trawl vessel participation, and the lack of market and infrastructure.**”*

Elements like “declining trawl vessel participation and lack of markets and infrastructure” are derivative, forced outcomes brought about by the ITQ program itself. In essence they are the symptoms of supply chain and management structure imbalances. They are not root causes why more Dover and other DTS remain unharvested.

Actual causal elements engendering underutilization, reducing vessel participation, and leading to a shrinkage of markets include the huge rise in cost to fishermen and processors, absolute accountability with inflexible vessel limits that create hoarding of essential bycatch, and lastly gear switching.

To our point: The trawl industry has kick started 3 major markets and added support infrastructure to match in the last 20 years. The first is whiting. More recently and rapidly we brought rockfish from several millions of pounds to tens of millions. Lastly was the Dover production and market expansion that we increased by 97% from 2007 through 2009. Whiting and rockfish continue on but Dover dropped precipitously in 2011.

If the SaMTAAC believes that declining participation and lack of infrastructure are a primary cause of underutilization then we need to analyze the cause and effect of other known causal factors such as high costs and absolute and inflexible accountability to understand how each is impacting achievement of OY, Goals 2 and 3 of the FMP and the economic goals in Amendment 20.

Pacific Seafood again refers to the EDC A-20 review reports. “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 gear¹” and “Sablefish quota is the principal constraint on DTS trawl fishing...²”

This above statements are explicit: If trawl sablefish quota is removed from active trawlers the potential for Dover harvest is diminished. The absolute degree that this loss constitutes, in the context of the various objectives laid out in the NMFS Purpose and Need, requires the economic analysis at each analytical level, and all selected gear-switching alternatives to be contrasted and measured against a trawl fishery that allows no gear switching.

¹ August 2017 EDC Catch Review 3-156

² August 2017 EDC Catch Review 3-147

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We thank you for your consideration.

Sincerely,

Handwritten signature of Mike Okoniewski in blue ink.

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