

From: Fury Group Inc. <office@furygroup.com>
Sent: Tuesday, January 21, 2020 7:57 PM
To: Michele.Culver@dfw.wa.gov
Subject: Letter on SaMTAAC

Dear Ms. Culver,

I hope you are having a great start to 2020. We have met briefly at council meetings in the past – I hope you do not mind me sending this long note to you directly.

I served as Washington's shoreside catcher vessel representative on the original Community Advisory Board tasked with the five-year review of the catch share program. I have not been a vocal participant as the conversation on sablefish attainment and gear-switching has moved into more focused groups. The vessels I manage (Arctic Fury, Pacific Fury, Nordic Fury, Ocean Fury) primarily participate in Alaska fisheries and the Shoreside and At-Sea Pacific whiting fisheries. At the start of the rationalization program, we decided to dedicate one of our vessels (Arctic Fury) exclusively to West Coast fisheries. In addition to fishing Pacific whiting for 6 months a year, we participated in the dover sole trawl fishery in 2011 and the fixed-gear sablefish fishery in 2012. We delivered over 150,000 lbs. of northern sablefish in 2012. This is all to establish a context for our stake in the outcome of the SaMTAAC meetings this week and ultimately the council's final decision.

As the West Coast fisheries evolve, we would like the opportunity to gear-switch again. Some of our staple Alaskan crab fisheries are in a period of decline and being able to participate in other coastal fisheries may help buoy both vessel and crewmember incomes that rely on pot fisheries. Including 2011 as a criteria year would help sustain flexibility in Fury Group's individual case, but I still see restricting anyone's ability to gear-switch as a detriment to the intent of the program overall.

I do not understand how reducing anyone's flexibility in this industry is ever a good thing. I also do not understand how reducing a vessel owner's ability to deliver a high value species in order to allow other people to obtain a lower value species is economically sound. We tried dover sole and could not make it pencil on our vessel; access to sablefish had nothing to do with it. You cannot cover costs being limited at 25,000 lbs. of dover sole per trip and should not be forced to deliver sablefish at half the pot price to do so. I have heard some processors are working on being able to take higher quantities of flatfish and pooling halibut and sablefish as bycatch. This is an excellent idea that I would gladly contribute time, quota and possibly even a harvest vessel to! Why not form a coop centered around using sablefish to bolster economic stability in attaining other trawl species? Processors own permits that collectively have a great deal of sablefish. Certainly enough to ground truth the viability of running a sustainable trawl operation off of it - make a proposal to some catcher boats and go to work. It may take some time to get the operation smooth, but I have no shortage of confidence in the fishing community's ingenuity. Changing the way a quota holder can use their allocation after they've been successful within the rules seems very heavy handed and unnecessary.

Like most other active fishing companies, we make every attempt to trade as many pounds to other harvesters as possible. Excluding a whiting boat that had a rare lightning strike, I have never had a trawler attempt to lease sablefish from me, ever. That should be telling. Most of the trawlers at the table endorsing gear-switching restrictions lease all or most of their sablefish to pot boats too. That's where you get the highest value so it makes sense. Sablefish isn't indicative of a failure in the quota system, it is one success that needs to be followed by others.

This is just one opinion coming from someone who is on the outskirts of this particular fishery. The whiting fishery is obviously our mainstay and focus. Fisheries change and we need to be as adaptive as possible. In a rationalized fishery I think the high level of accountability should allow for maximum leeway in terms of operations. Since everyone has been operating all these years under the assumption of a permanent gear-switching rule, I do not believe in gerrymandering participation qualifications to give a few people more valuable permits. My preference would be a no-action alternative. If that is not the will of the council, I hope ALL vessels with gear-switching history, including ours, will be recognized. Thank you for the time on this matter and also your dedication to the council.

Best,

Nate Stone
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