

Sablefish Gear Switching - Comments



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Purpose and Need

“...Working within the guidance and authority provided by the MSA (§303A(c)) 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.”

“This action is needed because the Shorebased Individual Fishing Quota (IFQ) Program has under attained most of its allocations since the inception of the program in 2011....Under attainment results in the Shorebased IFQ Program being unable to meet Management Goals 2 and 3 of the 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.”

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Key Questions in Analysis

1. Has gear switching impeded the attainment of northern IFQ allocations with trawl gear?
2. Could gear switching impede the attainment of northern IFQ allocations with trawl gear in the future?

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No

4.1.2 Trawl Fleet (p. 51) “...Where gear switcher use of sablefish QP is not displacing harvest of trawl complexes, reduction of gear switching is more likely to result in

- ▶ Some increase in the proportion of sablefish in trawl harvest complexes, or
- ▶ Sablefish QP going unused...”

Table 14 (p. 52)

- ▶ The proportion of sablefish in trawl harvest complexes in 2019 has increased above the 2016-2019 average for every trawl strategy

Table 1 (p. 12)

- ▶ Since the IFQ Program was implemented in 2011, there has been unused sablefish QP in the trawl allocation every year

Could gear switching impede the attainment of northern IFQ allocations with trawl gear in the future?

No for IFQ allocations of higher value, and unlikely for DTS given other competing markets

Section 2.1 (p. 13) and Figure 2 (p. 14)

- ▶ The trawl target strategies with the highest revenue per 1,000 lbs of sablefish are midwater rockfish and whiting. The revenue for these target strategies is so much higher, they can outcompete others in the sablefish QP market.
- ▶ DTS could be affected by a shortage in availability of sablefish QP; however:
 1. The DTS revenue is at least 45% less than other trawl strategies
 2. Higher ratios of non-sablefish to sablefish have been achieved in the DTS strategy (e.g., in 2013, 2016-2019, and in 2020); and
 3. To fully access the Dover allocation, the DTS non-sablefish to sablefish ratio would need to be unrealistically high (e.g., 25:1 with zero gear switching)

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Key Analytical Questions

(That Still Need to be Addressed)

1. How do these gear switching limit options fit with the SaMTAAC alternatives?
 - ▶ For example, Alt. 1 coincides with No Action—how do the others align?
 - ▶ What do these limits apply to specifically for each alternative?
 - ▶ How would these limits be implemented?
2. What are the impacts to smaller fishing ports and communities resulting from a shift from fixed gear-caught sablefish to trawl-caught sablefish?
3. Does the proposed action follow the guidance of the MSA?

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SEC. 301. NATIONAL STANDARDS FOR FISHERY CONSERVATION AND MANAGEMENT

(4)...such allocation shall be (A) fair and equitable...(B)...promote conservation; and (C) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

(5)...where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.

(7)...where practicable, minimize costs and avoid unnecessary duplication.

(8)...take into account the importance of fishery resources to fishing communities...in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

(9)...to the extent practicable, (A) minimize bycatch and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

Thank you!

Do you have any questions?