

July 8, 1999

The Honorable Adam Smith
U.S. House of Representatives
116 Cannon HOB
Washington,, D.C. 20515-0001

Dear Congressman Smith:

The Fishing Vessel Owners' Association (FVOA), founded in 1914, is a trade association, representing vessel owners that use longline gear. The FVOA is located in Seattle, Washington, and its members operate in waters from southern California to Alaska. Although FVOA vessels are primarily homeported in the State of Washington, some are based in California, Oregon and Alaska.

As Manager of the FVOA, I have prepared the following briefing for you concerning the management of rockfish species off the coasts of Washington, Oregon, and California. Although I am a member of the Pacific Fishery Management Council, I provide this briefing in my private capacity. I feel obliged to present the following concerns and status report to you regarding the management of rockfish off the coasts of Washington, Oregon and California. I have followed the management of these valuable species since 1974, when I began work with the Association. I consider their current state to be a disgrace. Poor resource stewardship accounts for the financial disaster facing the coastal communities and fishermen that were once dependent on those fisheries.

The FVOA has long had concerns over the management of the rockfish complex off the West Coast, and has testified to those concerns numerous times before the Council. On behalf of our Association, our fishermen have individually protested the high levels of discarded fish that fisheries managers failed to count against harvest guidelines, harvest levels that were too aggressive, harvest strategies of intentionally fishing down the resource, and evident scientific miscalculations.

The Council has been informed over the last year-and-a-half by its scientists that the rockfish species are much longer-lived than previously assumed. The old assumptions of 15- to-20-year life spans have been changed to 30-to-120-years. These earlier assumptions contributed to harvest levels that were too aggressive for such long-lived species. Belatedly, the Council will

hear this fall from its Scientific Committee on less aggressive harvest strategies and rates. The anticipated changes are expected to be much more conservative, reflecting this long overdue, revised analysis.

There have been other failed scientific approaches to management. “Fishing down” the resource has been among them. The thinking behind this management approach has been to fish a specific biomass down to a level from which a constant harvest could be provided on an annual basis. This approach requires a great deal of knowledge about the life history of a resource and accurate knowledge of discards at sea, both which have been sorely lacking. The scientists have been on record that their science was good enough to implement a “fishing down” concept. The concept has been a complete failure, due to the lack of accurate scientific information and erroneous assumptions on aging and discards.

An example of the “fishing down” concept in practice can be traced through the management of Dover Sole. The original concept was that this species’ biomass could be fished down to a biomass level from which a continual annual harvest of 18,000 metric tons could be realized. That target was subsequently lowered, and lowered again. The 1999 harvest guideline is now 8,955 metric tons. Wisely, at last, the fishing down concept has been discarded and there is new concern with regards to Dover Sole, as reported from the Council’s Star Panel report stating:

Exploitation status—There was a concern raised as to why selectivity is estimated to be increasing on the younger age groups over time when in fact the fishery has moved to deeper water where the older fish are. If this is true, the inference is that discarding of sole less than age 5 must be substantial. This would affect our recruitment estimates among other things.

Similar fishing down management approaches have resulted in the declines of several rockfish species.

The underestimation of discards has added risks to management. For many years, management based the fishing mortality on what was landed. Harvest of the majority of the rockfish species is done by the bottom trawl fleet off the West Coast. The style of management has evolved over the last 20 years into what is known as monthly or bi-monthly trip limits, which have caused an increase in discards. Our scientists have assumed a discard rate for most rock fish species of 15-to-20 percent. For some species, it has been recently raised to 30 percent. The past discard rates that the Council used should probably have been doubled. If the managers had thought they had accounted for all mortality, with past discard assumptions, they were still inflicting 15-to-20 percent additional mortality on different rockfish resources. It is my opinion that this has resulted in significant additional risk to the resource.

In the fall of 1997, the Council received, from its scientists, the first official reports of how desperate the situation had become in the rockfish complex. The Council dropped harvest levels

from 20-to-50 percent for most rockfish species. In 1998, the Council lowered harvest levels again. In 1999, we were informed that Pacific Ocean Perch, Bocaccio, and Ling Cod were mandatorily listed as overfished, and during the year 2000, the Council must submit rebuilding plans. This work is currently underway, and the Council will meet that deadline. In addition to these species, it is likely that a species found off California, known as Cow cod, and coast-wide species of Canary rockfish and Widow rockfish could be in the overfished category for the year 2000. Bocaccio rockfish is at such low levels, it could be listed as threatened. Collectively, the Council's harvest levels for rockfish are one-third to one-fourth of what was allowed in 1981. The economic impact on the fishing fleet and coastal communities has been devastating, and I do not foresee any immediate relief. As more and more of these species are determined to be overfished, other species' harvest levels will likely have to be dropped, in order to protect the overfished species, thus further impacting the fleet and dependent communities.

The cuts in harvestable levels are necessary and cannot be avoided. Due to the long-lived nature of most of these species, and to their low fecundity, I would not expect recovery for 10-to-20 years, provided that we have cut the harvest levels enough. The Council is also necessarily looking at marine reserves and habitat impacted by fishing gear. However, there is such little research on West Coast reserves and gear impact on habitat that these options will be highly controversial and are not likely to be the main driving forces of recovery. They cannot, however, be discounted as helpful to any rebuilding plan.

The issue of unrecorded discards, in my opinion, is a key element in getting a handle on total mortality issues. Several years ago, I took part in the development of an observer program for the North Pacific Council. That program has provided much needed information and is now the foundation of most of the management strategies implemented by that Council. I believe that the North Pacific Council's observer program has served the resource, and ultimately has served the industry very well.

The Pacific Council has recently supported the development of an observer program to assist in the quantification of at-sea discards. The current budget presented by the President provides for \$2 million to begin such an effort. The Senate appropriations measure provides this amount. It is urgent to secure support in the House of Representatives. It is estimated that with this funding, the Council could deploy 15-to-20 full-time observers annually on the West Coast fleet and begin to get the much needed information on discard mortality. Without this information, the Council will be compelled to be more conservative than it is already mandated to be under rebuilding requirements of the Magnuson Act..

The Oregon Otter Trawl Commission, during 1996-to-1997, conducted a pilot observer program. It showed an overall discard rate between 33 and 40 percent. The Council has been told the information from this project is too limited to contribute to management, and for some reason, the total report has not been made available to the public. It is my opinion that this preliminary information is accurate. The Government of British Columbia, the International Pacific Halibut Commission, and the North Pacific Council, with at-sea observers on fleets similar

to those operating off Washington, Oregon and California, have reported similarly high discard rates in the wet fish bottom trawl fleets. The Pacific Council intends for the observers to be placed on fixed-gear vessels, as well as trawl vessels, and FVOA members support this.

There are some industry representatives who would suggest that the \$2 million amount is inadequate, therefore spend it somewhere else (see comments of Rod Moore attached). If you had made either a shore-based or at-sea investment in a vessel or processor, wouldn't you demand, at the very least from management, an accurate accounting of total fishing mortality in order to protect your interests? There is never enough money, but we see the proposed \$2 million as the only way to begin to get the critically needed information. Not to support this appropriation is economic folly, from an industry perspective.

Our members are fearful about their futures. They understand and support the necessary harvest cuts. The members have testified and supported a mandatory observer program many times and hope that the House will support the President's request and Senate's recommendation for the \$2 million observer program. We cannot emphasize strongly enough the desperate situation that has developed on the coast. We have attached charts presented to the Council at its June 1999 meeting by the NMFS regarding some of the more important rockfish species. The sharp declines in biomass are testimony to a failed management regime. The members of FVOA urgently request your support of the observer funding of \$2 million to assist West Coast groundfish management.

Sincerely,

Robert D. Alverson
Manager

RDA:cb

Enclosures