Re: Scup GRA Framework Meeting 2

Dear Council Members,

We are writing to voice our support for modification of the Southern Scup GRA through a combination approach. While it is impossible for the Council or regulatory agencies to quantify the loss of longfin squid revenue due to the current configuration/operation of the GRA, we can emphasize the fact that the GRA has cost Seafreeze Ltd. and the squid fishery millions of dollars in lost fishing opportunity. Our vessels typically target longfin squid during the winter trimesters, but have been denied access to significant fishing grounds by the implementation of the GRA.

Therefore, we strongly support the modified boundaries of the Southern GRA, as perfected by the Advisory Panels at their January meeting. These modifications would allow access to areas vital for the winter longfin squid fishery. They are the result of a collaborative effort, where many industry members provided input.

In addition, we support the removal of statistical areas 632 and 626 from the GRA. As noted in the Council staff memorandum on this action, area 632 has produced only 90 lbs of observed scup discards over a 25 year period. This is clearly not adequate justification for the economic harm resulting from the GRA itself. We submit that the same justification applies to removing area 626 from the GRA. Figure 7 of the Council Memorandum indicates that in the same 25 year period of analysis, only slightly more than 10,000 lbs of discards were observed in area 626. It appears that these discards occurred in only two of 25 years, and that the area has not indicated consistent discards over time, in contrast to the other statistical areas. Recent science has shown that scup have progressively shifted their spring center of biomass north by 150-200km, due to changes in temperature and shifting isotherms,¹ making the southern areas of the southern GRA even more ineffective. Ecosystem based management must take into account these dynamics. As the Council balances economic harm to healthy fisheries with conservation concerns, we submit that the minimal impact that area 626 has on the scup stock

does not outweigh the hundreds of thousands if not millions of dollars denied the squid fishery by its inclusion in the GRA.

As the effect of removing area 626 along with area 632 is a compromise between two alternatives already under consideration by the Council- the removal of 632 alone and elimination of the southern GRA- we do not believe this would require further analysis for the purposes of the Framework and would not delay the action. It is important to the squid industry that the modifications to the GRA be in place by January of 2017, in order to ensure access as soon as possible.

For similar ecosystem considerations, we support the Advisory Panel proposal to modify the timing of the Southern GRA from January 1-March 15 to February 1-March 15. However, we do not support this option at this time if the addition delays implementation beyond January 2017.

We also request that the Council bear in mind that scup is a more than fully rebuilt fishery, with a biomass more than twice its target. Although there have been attempts to attribute the rebuilding of the scup resource to the GRA, we believe it was other management actions that brought about this result. Regardless, the GRA is not necessary as a rebuilding tool at this time. Tools should be used as appropriate, when appropriate. Therefore, we would also support, in addition to boundary modifications, the AP suggestion for temporary suspension of the GRA in order to evaluate its effectiveness. It was suggested at the January AP meeting that the GRA be utilized as a true tool, capable of being turned “on” or “off” based on a threshold or qualifications determined by the Council. We would support such a suspension for evaluation purposes, and the exploration of responsive management.

Thank you for your consideration of these matters.

Sincerely,

Meghan Lapp
Fisheries Liaison, Seafreeze Ltd.

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2 SSB is estimated at 403.6 million pounds; the SSB target is 192.47 million pounds. See http://www.asmfc.org/uploads/file/55e09cd7ScupStockAssessmentOverview_Aug2015.pdf.