

Agenda Item D.7

ARGOS, INC.

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Robert L. Eder

Michele Longo Eder

November 10, 2006

Dr. Don McIsaac  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

Dear Dr. McIsaac:

During the Council meeting, I understand that there will be a report from the Chairman and/or staff as to the recommendations of the Committee, but I would like to voice my concerns as an individual, representing limited entry fixed gear.

**1. Reconsideration by the Council of Sablefish Allocation**

At the GAC meeting, both myself, and Tom Ghio, representing open access on the Committee, and Bob Alverson, director of the FVOA, and a member of the public, spoke in favor of the Council revisiting the sablefish allocation. The recommendation of the Committee, to not do so, was not unanimous, as reflected in the Committee's minutes.

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In short, I believe that sablefish allocation should be revisited by the Council, and that a larger share of the sablefish should be allocated to the fixed gear fleet.

If the Council will examine the observer data for both the fixed gear and trawl fleet, as it relates to discard, it is apparent that there is far less discard in the fixed gear fishery. This data, for both fleets, is readily available to the Council, at least through 2005.

I believe that the Magnuson-Stevens National Standards, and the Council's own Amendment 18 and Bycatch Work Plan mandates a reconsideration of this allocation

Other committee members suggested that the problem of trawl discards will be dealt with as part of a trawl individual quota plan. While the accuracy of that

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statement is subject to debate, it is unrefuted that the timetable for the actual implementation of a trawl IQ program, in the best of circumstances, is not scheduled to begin until Jan 2011, 5 years from now. This means 5 more years of continued discard mortality of sablefish that has been allocated to trawl, as opposed to an allocation of sablefish to a gear type, pot and longline, which have significantly less bycatch and discard mortality.

Further, there is also the possibility that the implementation of the TIQ plan may be delayed, or never occur. This is another reason the Council should include sablefish as one of the species to be considered for allocation amongst gear groups.

By not considering the allocation of sablefish at this time, the Council will miss the opportunity to address this issue in an orderly manner, in the same way it will deal with the allocation of other species.

## 2. Allocation of Other Species

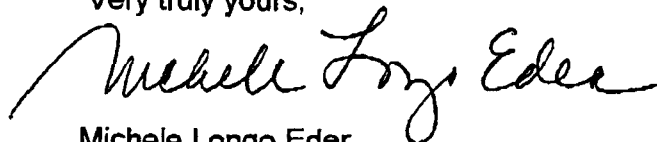
There has been discussion in the Committee to allocate to trawl gear those species in which over the past few years, trawl gear has captured 90% or more of the fish. While this may demonstrate a dependence on certain species by the trawl fleet, the question still remains as to whether the Council should allocate in favor of a gear type, without consideration as to whether other gear may catch the fish, with fewer discards and mortality.

Of particular concern to me is that these "hard allocations" would be proceeding forward, regardless of whether a trawl IQ program is implemented. It seems to me that proceeding in this manner may only institutionalize less than optimal fishing practices.

In sum, I ask that the Council decide to include sablefish as one of the species ~~to be allocated, and that the Council seriously examine each species, not solely~~ based on landings history, but by a gear's ability to minimize bycatch, discard mortality, and impact on habitat.

Thank you for this opportunity for public comment.

Very truly yours,



Michele Longo Eder

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