Subject: Opposed to IFQ's
From: Kirk Younker <KYounker@pacseafood.com>
Date: Tue, 27 May 2008 11:10:45 -0700
To: pfmc.comments@noaa.gov
CC: Rod Moore <seafood@integra.net>, Craig Urness <CUrness@pacseafood.com>

I oppose the formation of individual quotas. I have participated in the West Coast groundfish industry as a fisherman and then a processor for over 30 years. To change our current system to a derby style fishery owned by a few, in a few select ports will be a misuse of what was once a public resource. Our industry needs a sustainable year around supply of seafood that will be available in all ports to supply year around jobs for coastal communities.

Thank you.

Sincerely

Kirk Younker
Commercial fisherman and now Plant Manager for Pacific Choice Seafood, Eureka CA

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Hello,

You are receiving this email as you are either directly or indirectly involved in the upcoming decision by the Pacific Fishery Management Council on groundfish and whiting rationalization. Below is a recent news articles and two editorials which outline the situation and the importance of both processors and fishermen being recognized in the initial allocation.

Please visit www.coastaljobs.org for more information.

We appreciate your ongoing support.

May 21, 2008
Seafoodsource.com

Shared-Market System Deserves Consideration

One aspect of today's omnipresent sustainable-seafood movement that often gets short shrift is the sustainability of the industry itself - by that, I mean the fishermen and the processors that make seafood available to us all. Indeed, science should guide fishery-management decisions; but if key stakeholders are eliminated from the process, then we're missing the boat.

During the week of June 9, the Pacific Fishery Management Council will vote to adopt either a shared-market system, similar to what's currently in place, or individual fishing quotas (IFQs) that would allow only owners of government-issued permits to participate in the Pacific whiting and groundfish fisheries. More than 300 stakeholders in the West Coast seafood industry representing more than 3,600 jobs say IFQs, which Alaska has turned to for several of its fisheries with varying degrees of success, would essentially create a monopoly.

The Portland, Ore.-based Coastal Jobs Coalition, comprising industry leaders, restaurant owners and other local businesses, argues that a shared market would protect jobs in coastal communities, guarantee fair access to resources, stabilize prices for consumers and encourage environmental stewardship.

"An individual quota system has the potential to be a great solution for the region's seafood industry, as it can help to manage our natural resources and alleviate the pressure to race for fish. The proposed new rules, however, allow a select group to reap the benefits," says Heather Munro Mann, deputy director of the West Coast Seafood Processors Association. "The rest of the coastal community's stakeholders - from workers in processing plants to restaurants, retailers and consumers - face considerable insecurity."

While researching the Magnuson-Stevens Fishery Conservation and Management Act when it was reauthorized in early 2007, I spoke to Clem Tillion, a hard-nosed Alaskan who was a charter member of the North Pacific Fishery Management Council. Tillion supported IFQs, which were not at all popular when first introduced. One thing he said stuck with me: "The purpose of fisheries is not to provide jobs," he said. "You serve the fishermen best if you keep the resource healthy."
But I also spoke to David Benton, director of the Marine Conservation Alliance in Juneau, Alaska, who told me that a cookie-cutter approach to fishery management isn't the way to go. "One size does not fit all," he said. "Each plan needs to be designed and tailored for each individual fishery."

Nothing should prevent the conservation of wild fisheries and jobs within the seafood industry; a healthy balance is essential. If some of the largest West Coast seafood companies and organizations can agree to share access to the resource, then it's a solution that bears a closer look. Come June 9, let's hope the council has done just that.

Thank you,
James Wright
Assistant Editor, SeaFood Business
May 20, 2008
THE COLUMBIAN

Allocation key in fishing

The future of the West Coast seafood industry is at risk. Already anticipating economic devastation from a canceled salmon season, communities may soon receive another blow to jobs and economic security.

During the week of June 9, the Pacific Fishery Management Council will vote on a quota-based system for Pacific whiting and groundfish to manage resources. The Council is considering allocating 100 percent of quota to vessel owners, putting shoreside seafood processors and coastal communities at the mercy of a virtual monopoly. Without decent and reliable access to resources, hundreds of jobs and millions of dollars in investments are at peril.

As president of a seafood processor that has created family-wage jobs in Washington, Oregon and California for more than 75 years, I believe that the only solution is a shared allocation of quota. Fair allocation of resources can preserve the livelihood of fishermen, processors and coastal communities alike.

Jay Bornstein
Astoria, Ore.
Fishing council needs to make the right choice

Last month, Governor Kulongoski re-affirmed his intent to have no-fishing zones established in state waters. Three weeks ago, the Pacific Fishery Management Council recommended shutting down most salmon fishing in Oregon and California. And within two years, wave energy sites will be popping up on the coast and putting more water off limits to commercial and recreational fishing vessels.

Does this mean we are doomed to eating foreign farm-raised fish while our coastal communities slide into economic decline? Not necessarily, if those who manage our fisheries make the right decisions.

In June, the Pacific Council will decide how our groundfish fishery will look in the future and whether that fishery can sustain commercial and sport fisheries and the coastal communities that rely on them. Central to that decision will be whether and how to divide up fishing privileges. On the one hand, the council can bestow those privileges entirely to commercial fishing vessel permit holders, who can then do with them as they please: favor one community over another by delivering all their catch in one place, or even sell those privileges and retire on the proceeds. On the other hand, the council can take a more balanced approach and distribute some of those privileges to coastal facilities, thereby maintaining jobs and community infrastructure.

At a time when our coastal communities are at risk from other fishery failures and regulatory decisions, we trust that the council will make the right choice by sustaining both our fish stocks and our communities.

Heather Munro Mann
Deputy Director, West Coast Seafood Processors Association
Siletz
Subject: Ron Hensley <RHensley@pacseafood.com>
Date: Wed, 28 May 2008 08:11:01 -0700
To: pfmc.comments@noaa.gov

Dear Mr. Chairman and Council Members:

I oppose the formation of individual quotas. I have participated in the West Coast groundfish industry for 39 years. I started as a commercial fisherman in 1969 and now as a processor I am better off under the status quo. Our industry does not need another layer of unknown expense that is based on the hope that a quota system will result in more fish or higher prices. Because of good management practices, the industry will have greater access to fish in the future and our revenues are increasing every year for the last few years.

I also believe that a quota system will create a race for fish where one does not exist today. Because of over-fished species, if fishermen have access to 100% of their allowable catch for the year, they will be highly motivated to get their fish out of the water before being precluded from doing so. Under status quo, we have the same risks of a problem occurring, but the ability for a race is far more limited and it has yet to occur.

A rational alternative is to allow vessels to stack up to two permits and provide quarterly limits. This will lessen the impacts of weather on the ability to land fish. And, at the same time, will achieve the same consolidation as the proposed quota system. This can all occur without the unknown expense and complexity of the proposed quota system.

Please consider my opinion.

Thank you.

Sincerely

Ron Hensley

Ron Hensley
Cell 707-496-1384
Office 707-442-2961 ext 103
May 19, 2008

Pacific Fishery Management Council  
Don Hansen, Chair  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

Re: Trawl Rationalization Alternatives – Agenda Item F-6

Dear Chairman Hansen,

I am the manager and captain of the FV Muir Milach. We fish whiting and I want to offer some comments on the trawl IFQ program.

Catch History Years

My primary concern about the catch history years is that whatever they are, when the Council makes its final choice they should be the same for mothership and shoreside whiting (and for groundfish.) It is the same fleet of boats that deliver shoreside and to motherships and would be unfair to use different years for catch history. Using different years is “cherry picking” and will unfairly benefit some boats. (see attached table for an example)

Whatever choice the Council makes for catch history years, it should be “apples and apples.” The preferred options selected by the Council at this point should be available in all options. The choice of programs (coop or IFQ) shouldn’t hinge on the catch history years.

Coops

The Council should focus on designing a program that doesn’t require going back to Congress for additional legislation.

Coops can be a useful tool within an IFQ system, but coops shouldn’t be a mechanism to create processor linkages. NOAA GC’s memo makes that clear as a legal matter in the shoreside sector, but it is also good policy which should be applied to the mothership sector.

The new MSA requires the Council to “fully analyze alternative program designs, including the allocation of limited access privileges to harvest fish to fishermen and processors working together in regional fishery associations or some other cooperative manner.”

The definition of “Regional Fisheries Associations” in the new MSA makes it clear that RFA’s must “be a voluntary association among willing parties.”

Coops work best when they are voluntary “affinity” based associations, rather than arbitrary groupings based on processor linkages. A straight-forward IFQ system doesn’t stop IFQ holders from voluntarily forming cooperatives to deal with bycatch issues or to work cooperatively together with a processor.
Processor Linkages

If the Council is going to include a “coop” option for the mothership sector, it should be one that meets the legal criteria that would apply to shoreside “coops” as a matter of policy.

There are two key features of the mothership “coop” proposal, without which it might as well be an IFQ program:

1- the closed class of processors, and
2- the punitive “non-coop” part of the fishery for vessels that want to change processor linkages.

The un-rationalized “non-coop” pool is nothing more than a means to force involuntary linkages between harvesters and a closed class of processors as the price of rationalization.

The analysis compares the mothership “coop” proposal to AFA coops, but misses key differences. In the AFA pollock mothership sector there is a closed class of processors, but there are no linkages. If linkages aren’t necessary in the AFA mothership sector, why are they necessary for whiting?

In the AFA shoreside pollock sector, processor linkages do exist, but coop formation is contingent on approval by 80% of the vessels, which gives some protection to independent boats. Even with linkages, coops can sell a 10% of their allocation to the processor of their choice. This also provides an alternative way to move between coops without going through an “open access” year.

The mothership processors will have the benefit of a closed class. It is also clear from the analysis that there is substantial vertical integration in the mothership sector.

Even if linkages are necessary, why should it apply to 100% of the harvest? Why not 50%?

Single CV Sector

We support a single CV sector for the trawl IFQ program. Creating artificial firewalls between the shoreside whiting and groundfish sectors doesn’t make sense.

Boats that fish whiting may receive a portion of the buyback history, or they may have groundfish quota from their groundfish history. In a single sector, this could offset the need for setting aside a portion of the groundfish OY to support the incidental catch needs of the whiting fishery.

Adaptive Management

I support the inclusion and further analysis of an “adaptive management” part of the program, along the lines of the 10% holdback in the B.C. trawl IFQ program. The B.C. program seems to have been successful in addressing community and processor concerns about potential negative impacts from IFQs.

The analysis needs to be much more specific about this portion of the allocation could be used.
New Entrants

I have a relief skipper who has been with our vessel for many years and operated the vessel in the whiting fishery. There are no provisions for skippers under any of the alternatives. The adaptive management provision could be used to help skippers become stakeholders in a quota share program.

With coops there is no way a skipper can acquire a small amount of quota. To become a quota owner under the coop alternative he would have to purchase the entire history of a vessel. Under an IFQ system a new entrant can buy in gradually.

Thank you for considering my comments.

Captain David Willmore
FV Muir Milach
7858 SE 28th Street A-208
Mercer Island WA 98040
Groundfish Rationalization Catch History Years

The choice of catch history years should be consistent between sectors, whether or not the choice of programs is consistent.

The choice of program type (either IFQ or Coop) should not be influenced by differences in the sets of catch history years between the two program alternatives, nor should the catch history years be determined by the choice of program.

As presently structured, the IFQ alternatives use a longer time series than the Coop alternatives. (1994 to 2003 versus 1997 to 2003). Additionally, some members of the MS sector have advocated using 1998 to 2004 for the MS sector only.

Using different years for different sectors, does not result in “fair and equitable distribution of access privileges in the fishery” among similarly situated persons, as illustrated by the following table.

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Hypothetical Vessels 1 & 2 each participated in only one sector per year, however each participated every year in either the MS or the SS sector of the whiting fishery. Between 1994 and 2003 both Vessels 1 & 2 participated for 5 years in the MS sector, and 5 years in the SS sector (assume these hypothetical vessels had typical and consistent landings.)

If IFQs are chosen for the Shoreside sector using 1994 to 2003, and Coops are chosen for the MS sector using 1998 to 2004, the allocations to the two vessels would differ radically.

Vessel 1 would get credit for 1 of 7 qualifying years for the MS sector, while Vessel 2 gets credit for 6 out of 7 years.

Vessel 1 would get credit for 5 of 5 qualifying years for the SS sector, and Vessel 2 also gets credit for 5 out of 5 years.

The result is that each vessel gets 50% of a full Shoreside history, but Vessel 1 only gets 14% of a full MS history, while Vessel 2 gets 86%. Vessel 2 gets a windfall as a result of using more recent years for the MS sector relative to the Shoreside sector, while Vessel 1 gets penalized.

1994 through 1997 should be included for all sectors or none.

The desire to include catch history that is more than a decade old should be balanced against recognizing “present participation” and current “dependence” on the fishery.”

We don’t oppose including history as far back as 1994, though there is little precedent for reaching that far back. However, it is necessary to recognize that “control dates” don’t have any regulatory weight, nor are they mentioned in the MSA. What the MSA does say, is that limited access programs must “take into account…” (among other things) “present participation…and dependence on the fishery.”

A vessel that has participated in, and depended on, the shoreside whiting fishery for the last 10 years, should not lose the last 4 years of that “present participation” if a vessel that hasn’t depended on the fishery for 10 years is to get credit for history that older than that.

Sup Agtem F.6.e

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WEST COAST SEAFOOD PROCESSORS ASSOCIATION
1618 SW First Avenue
Suite 318
Portland, OR 97201
503-227-3076

RECEIVED
MAY 30 2008
PFMC

Mr. Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Ste 101
Portland, OR 97220

Dear Mr. Hansen:

For the past five years, West Coast Seafood Processors Association (WCSPA) and its members have worked with the Council and its various advisory bodies on advancing a proposal to establish individual quotas for the trawl sector of the Pacific groundfish fishery. As all of those involved know, the effort has been difficult and often contentious. Nevertheless, WCSPA members continued to participate in the effort because they shared the belief that a properly structured quota plan could provide benefits to all parties: fishermen, processors, communities, and the fish stocks themselves.

At its June meeting, the Council will consider a preliminary preferred alternative for a quota plan. In preparation, several Council advisory bodies have met and forwarded recommendations. To date, those recommendations have been disheartening as in some cases they appear to provide economic benefits for only a segment of the many fishery interests and no clear conservation benefit. Making matters worse, we have no idea what the cost will be to implement a program, much less one as complex as some of the recommendations. Most importantly for WCSPA members and the communities in which they reside, the recommendations provide no protection against processor displacement, an issue that has always been central to our concerns. If the Council chooses to adopt these recommendations in their preliminary preferred alternative, we have no choice but to strongly oppose it.

The Council has an opportunity in June to move forward with a program that will provide benefits to all sectors; we hope to be able to work with you in bringing it to final action.

Sincerely,

[Signature]
Frank Dulcich
President

Sup AgItem F.6.e
June 1, 2008

Mr. Don K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place Suite 101
Portland OR 97220-1384

Dear Mr. Chairman and Members of the Council:

I recently traveled to South Africa to visit various sardine and ground fish customers. In discussions with CEO’s and other top executives of two of the largest Sea Food Corporations in South Africa I was asked about the present effort to institute the West Coast TIQ program. I explained that at this time it appeared that the quota would go entirely to the fishermen and would be allowed to be sold or leased as the fishermen wished without regard for the processors, markets or affected regions. South Africa has had a “Fishing Rights” system for many years. I asked them what would happen if a similar system were put into effect in South Africa. One CEO replied that it would spell an “absolute disaster” to processors and would spell the end to additional capital investment into the shore side infrastructure. Another said it would be a “ludicrous idea” and would ruin the industry. I found no one there that thought a “Harvester Only” IQ system would work.

If TIQ is controlled entirely by the fishermen the balance of harvest to market forces is lost. In essence the harvest component is the farthest point removed from the consumer and in worst position to understand what dynamics are at work in the market place.
If TIQ is placed entirely in the hands of the fishermen the processors will soon assume the role of custom processors. This will mean the end of shore side investment and attempts to develop methods to add additional value to the product. This is simply because all profit will be aimed toward the fishermen. If monies are diverted to plant investment, market development, and improved employee packages, or for any reason that reduces the income stream to the quota holder or fishermen, the quota holder will simply look for another processor to process their catch.
In this scenario it will not be long before plants will fall into disrepair and skilled workers will seek other work. As this happens the fishermen will look to other
perceived markets such as foreign JV’s to prop up their markets. This is already occurring in Canada.

The best uses of this Public resource are those that bring the greatest aggregated value to the entire catch. Measuring ex vessel value is only one component in this equation.

Aggregated Value can be enhanced in several ways: (1) The present market perceives that the present product forms are worth more. (2) New markets are opened which creates greater overall demand for the present product forms. (3) Recoveries can be enhanced through the use of technological innovation or by reengineering processing methodology. This simply means there are more processed pounds to sell, but to accomplish this requires capital improvements. (4) New product forms, such as value added, are developed that bring in greater sales revenues for the resource.

The danger in directing all profit to the fishermen is that incentive is lost for market resource development by the processors. The processor is the industry component that is most closely aligned with the market. They have had to be to survive. Again there will be little or no incentive for custom processors to spend monies on R&D, advertising, or expanding market base as these pose too great a cost risk in juxtaposition to minimal reward. Almost all reward will be passed over to those that control and rent harvest quota.

This is a dangerous economic situation for the overall industry and may well spark a death spiral for processors. Market development will virtually cease. Strategizing for the future will be focused on attempts to cut costs of the commissioned sales forces and custom processors. Long term this is self defeating in achieving the objective of enhanced resource value. Indeed it may well lead to lower ex-vessel revenues and a decrease in market demand.

Pacific Seafood has had a plethora of bad press in the last year. Much of this has been based on the premise that Pacific’s success was a derivative of less than ethical business practice. These articles have been so simplistic and inane in nature that it barely deserves comment.

However because it is an insult to all of us that work for Pacific and go to work with the intention of making a positive difference I will make several points: Contrary to what has been portrayed in the press Pacific is in their present position due to several key components that are never mentioned:

First: Early on, Pacific’s management team recognized that the reduction in quotas was either going to lead to a consolidation of industry or a metamorphosis into a boutique fishery. If it had moved to a boutique fishery the shore side infrastructure to handle large harvest volume would have all but disappeared along with most of the present markets.

Second: Pacific chose to invest capital in their plants to modernize and upgrade their systems in order to achieve operational efficiencies, gain recovery, and provide better opportunities for their employees, fleet, and customers.

Third: Pacific’s management team was composed of individuals from the coastal communities that strongly believed they needed to dedicate themselves to this task.
This was a huge risk. It would not have been accomplished without hard work, dedication and investment. If Pacific had not stepped up when it had it is likely that the bottom fish industry as we know it would have disappeared. Admit it or not the gross fleet revenues would be much less than present if Pacific had not set out on this mission. To deliberately put our employees, investments, and those years of dedicated effort in harm’s way in order to satisfy an ill-conceived, get rich scheme for certain select fishermen is a travesty of fair play. It is patently wrong.

In conclusion: The GAC recommendations should not be enacted. The results will devastate the bottom fish industry and eventually lower the value of the public resource. Some will get a retirement check or an entitlement but at what cost? Better analysis should be done on what really took place in Canada before we consider embarking on a path that attempts to unhinge the present market forces and re-engineer a utopian system that rewards only harvesters. You have only heard some fishermen’s stories on what an IQ system given entirely to harvesters will create. These stories are self serving and transparent. You need to look at venues like Canada where Fishermen based IQ has ruined many processors and is fast becoming a debacle.

I will finish with what I heard in South Africa. An Individual Quota system that only rewards harvesters will be a disaster. It is a ludicrous idea that is a recipe for a failure in resource management.

Thank you
Mike Okoniewski
General Manager
Pacific Seafood, Woodland WA Division
F/V Timmy Boy
Denny Burke
9618 SE Birch St.
South Beach, Or. 97366

RECEIVED

May 30, 2008

JUN 02 2008

PFMC

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Or. 97220

To council members & NMFS:

I own and operate the Timmy Boy half of the year. I run the boat for Dungeness crab in the winter and long line Sable fish with traps in June and July. The vessel supports three families plus me with wages 60,000 to 100,000 yearly per family, thus providing all of us a good living. One of our crew runs the boat for trawl ground fish and shrimp the remaining months of the year. This year we plan on catching most of our deep water limits.

We have participated in the trawl fishery from the 1990’s to now. We have history in the window years if ITQ’s become a reality. Even so I would like to express my concerns and reservations.

My first concern is the cost of implementing and running the program, the added cost of 1,000 dollars per trip for observer coverage and the added cost of 3-5% to run the program. It’s just not there.

In the past fuel was 10% of our gross, now in the trawl fishery it is 25%. You add buy back 5%, crew and skipper 42%, ice, unloading, and OTA 4% totaling 76% fixed cost. This leaves the owner with 24% to pay insurance – 26,000 a year, to replace nets, trawl wire and do maintenance on the vessel before he takes any funds home. There are no funds left for any added cost.

My second concern about the program is that I believe when its implemented I will have less access to the fish than I do under the present system. When Sable fish was rationalized I earned a Top Tier and the limits fell from the derby fishery. I’m not advocating derby’s, I’m just addressing what they called over head then. Many of the trawl permits now are not participating in the ground fishery. By splitting the buy out history all permits will get equal shares taking 45% of the fish off the table. Once again a fisherman will be forced to write large checks to purchase back fish that was available before. As an example in the Sable fishery I have three permits. 1 qualified for top tier and purchased a middle and bottom tier for 250,000 so I could fish for four or five trips a

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year. Mark my words the same thing will happen again. A man will be forced to spend money to just stay in the game.

My third concern is the probable consolidation of the fleet. Attending several GAC and ITQ meetings in Portland over the last few years, I heard and read about the caps and probable reduction in the fleet. I’m not convinced such huge change is necessary. What is best for the industry sixty powerful players left standing or the diversity we now have. Tough question!

Last I want to say I was a crewman for fifteen years. Six years in Alaska dragging. I saved and bought a troller in the 1970’s. It was a mistake so I sold it went back crewing and bought the Timmy Boy in 1985. Over the last 23 years I have been able to work and buy my way into four fisheries maintaining a decent living. Its still possible but much more expensive to work your way up fishing. ITQ’s will make it near impossible.

In the future if you want to trawl, you will either be a corporate employee or be born into a fishing family. Access to the industry will be for the few, the wealthy, and the powerful.

Thank you,

Denny Burke
May 27, 2008

Donald K. Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite #101
Portland, Oregon 97229-1384

Dear Chairman Hansen:

The Humboldt County Board of Supervisors is deeply concerned that catch history quotas are being considered by the Pacific Fishery Management Council. We believe the current equal access management is acceptable and appropriate.

Our local trawl fleet has complied with all the state and federal regulations. The trawl fleet has been reduced to a number that barely maintains basic harbor infrastructure. Any change in allocation would devastate our fishermen, related businesses and access to local seafood. Selling our fish stocks to other resource investors is not in the best interest of our fishermen or the public.

We respectfully object to any policy that would change the present “equal access” formula. Humboldt County has a long fishing history. Please do not allow the redistribution of resources to other individuals or states.

Sincerely,

Jill Geist, Chair
Humboldt County Board of Supervisors

JG:nlh

Cc: Senator Diane Feinstein
    Senator Barbara Boxer
    Congressman Mike Thompson
    Senator Patricia Wiggins
    Assembly Member Patty Berg
    California Department of Fish & Game
May 30, 2008

Mr. Donald K. Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Dear Mr. Chairman and Council Members:

I have been working in the West Coast Groundfish industry as a fisherman and permit owner since 1970. I am opposed to the formation of individual quotas.

I feel that the IQ program is probably the end of the trawl fishery. It will be extremely damaging to other fisheries and coast communities. It will give the fishery to a privileged few while take away the livelihood from the rest of the fleet. I see no need for this IQ program because the fish stocks are rebounding while discard rates are lower than they have ever been.

We were promised more fish after the buyback. That has not happened. Instead you charge us with a 5% tax to pay for the buyback and then come up with an IQ program to take the fish away from us and give to a few individuals.

This program will hurt the majority of west cost draggers to make a few people rich. The West Coast boats are the life and blood of the industry. They are the foundation for the port and provide jobs to help pay for the port infrastructure and facilities. This will be one more damaging blow to fishing communities.

From what I have read, most boats are not going to get enough fish to make a living. They will have to buy more fish or else be forced out. This makes no sense to me when the system we have is working.
The fish stocks are improving and the boats are starting to make a decent living. With the boats being forced out of the trawl fishery, they will be forced into other fisheries and this will put pressure on those fisheries so that those fisheries and their families will make less money.

In closing, all I see this program doing is hurting a lot of people so a few can get rich. I hope the council will vote against the IQ program and look at making longer fishing periods so everyone can make a living.

Sincerely,

[Signature]

Gary Ripka, Owner/Operator
F/V Two Saints
F/V Western Breeze
5/28/08
Mr. Donald K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chairman Hansen and members of the Pacific Fishery Management Council,

I'm Paul Johnson of M.F.M Seafood in San Francisco, Ca. As a wholesaler and processor of seafood for 30 years I am concerned about maintaining the economic and ecological viability of our fisheries. Although I applaud the PFMC’s attempt to bring the Westcoast bottom fishery to sustainability through the use of quota fisheries I don’t believe it is wise to grant permanent quotas to a few large processors I believe this would undermine the safety, economic and environmental benefits of an IFQ program. As well, this would stifle competition keeping small, innovative, sustainable minded processors locked out of participating in the market for a publicly owned natural resource.

I am in favor of the Adaptive Management Program option the council is considering. This option will keep the resource and the market open to small innovative companies and help the trawl IFQ program meet vital economic and community goals. By holding back quota to encourage processors and fishermen to enter into business arrangements would keep fish coming into traditional fishing communities, and maintain competition in the industry.

An Adaptive Management Program addresses known concerns, as well as unanticipated impacts. I believe The Adaptive Management Program would ensure the transition to quota system would create tangible benefits for the entire community.

Please oppose permanent IFQ allocation to processors, but support the Adaptive Management quota holdback program in the Council’s June preferred alternative.

Sincerely,

Paul Johnson
M.F.M. Seafood
Pier 33 S.F. Ca.

[Signature]
Mr. Chairman and Members of the Council

My name is Michael Brown. I am General Manager of Pacific Coast Seafoods Company, and also oversee production at Washington Crab Producers and Bio Oregon, a seafood waste processing company.

These companies provide close to 300 full time positions for various processes. The ground fish fillet operation at the Warrenton facility is likely the largest on the lower West Coast. I have over 30 years experience in filleting ground fish in the Columbia River area. I have witnessed numerous cycles over these years. And in doing so, I have spent considerable time talking to Fisherman and watching current catch per unit of effort.

A lot of emphasis has been placed upon the ground fish disaster that was declared in the year 2000. During the year 2003, the harvesting and processing sectors of this industry did indeed hit rock bottom as pertains to harvestable quota. Through many, including your own efforts, severe restrictions were put into place to protect against depletion of this resource. At the same time, the TIQ thought process became reality with a lot of time, effort, and considerable dollars consumed to analyze such a program. The ground fish “harvesting” sector was deemed to be not economically viable or sustainable.

There is, in my estimation a fundamental flaw and an important piece of all of the analysis’s that are being performed. We need to step back and take a look at fish stocks today. Many have rebounded. Some that were placed in the over fished status have rebuilt in fewer years than anticipated. If you look at the potential to harvest ground fish in 2008, verses 2003, there is more than double the capacity to earn on the harvester sector. It appears that beginning in 2009, that there will be even more opportunity to earn in the harvester sector. This is a success story, but that story is not being told.

Some are living in the past, and to do a TIQ program justice, we need to realize and recognize where we are at today. There are vast areas of the West Coast that are restricted from trawling. And the harvesters have changed gear types and their practices in some cases to protect the resource that both the harvester and the processor rely on to do their business and provide employment opportunity for numerous coastal communities. It would be a somewhat simple process to graph the increased opportunity that exists today and perhaps for the future. It is time for those who continue to declare this fishery a “disaster” to face the reality of where we are today, and quit using this non fact-based forum to push a bad decision upon us all.

This system does not need a complete overhaul. What we are using and doing is working. The full development of a TIQ program will take considerable time, dollars, and will push for further consolidation in both the harvester sector, and the processor sector. Many stand to get hurt if this is not done correctly. Many of these people have their entire lives
invested in this industry, and deserve the opportunity to be rewarded for having worked through the trying times of the early 2000’s.

Thank you for your time.

Sincerely;

Michael L. Brown
Dear Mr. Chairman and Council Members:

I believe I will be better off with individual quotas, being that I am on a company boat with good catch history. I oppose the formation of individual quotas because it will be very unfair for so many people. I have participated in the West Coast groundfish industry as a captain since 1980. I am better off under the status quo. Our industry does not need another layer of unknown expense that is based on the hope that a quota system will result in more fish or higher prices. Because of good management practices, the industry will have greater access to fish in the future and our revenues are increasing every year for the last few years.

I also believe that a quota system will create a race for fish where one does not exist today. Because of over-fished species, if fishermen have access to 100% of their allowable catch for the year, they will be highly motivated to get their fish out of the water before being precluded from doing so. Under status quo, we have the same risks of a problem occurring, but the ability for a race is far more limited and it has yet to occur.

A rational alternative is to allow vessels to stack up to two permits and provide quarterly limits. This will lessen the impacts of weather on the ability to land fish. And, at the same time, will achieve the same consolidation as the proposed quota system. This can all occur without the unknown expense and complexity of the proposed quota system.

Please consider my opinion.

Thank you.

Sincerely

[Signature]

Sup Agitem F.6.e
23
May 30, 2008

Mr. Donald K. Hansen  
Chairman  
Pacific Fisheries Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Mr. Chairman and Members of the Council,

Last week I plant gave a tour to 30 third grade students, their teacher and several parents of those students. They were fascinated at the processes that go into providing safe seafood products to the consumer. They had no idea of what the plant was all about and how many people that earned a living behind these walls. I can’t forget the one comment from one of the mothers who said, “these people are absolute artists in the work that they perform.” Yes, they truly are I told her and we would be nothing without them.

It is amazing how many people do not realize just what it takes to process our precious resource from the sea. I fear many here today are equally unaware and perhaps if we could give you all a tour, you too would see just how important we processors are to our communities, fishermen, and employees.

My public comment today is similar to the comments that I provided to the GAC in early May. I mentioned how prior to the Buy Back in 2003 that several boats in Crescent City and Brookings formed a Co-Op and how they went out on their own to become both fishermen and processors. And with the sudden loss of vessels to the processing plants and buying stations in those ports, those processors who were buying groundfish had no choice but to cease operations or certainly curtail them somewhat. The Co-Op shortly after also ceased operations and suddenly there were roughly a dozen vessels looking for markets but the markets, for the most part, were gone. Pacific Choice remained a viable market and began taking back some of the boats that it had lost to the Co-Op. When it became clear that other boats still needed markets, our fishermen were asking us to take on more vessels so their peers would not be without a place to sell their catch. So we did just that. But because we had suddenly lost 9 vessels overnight to the Co-Op, we had also hired on additional boats in other ports to make up for our loss. So when the Co-Op folded, Pacific Choice had more fleet than it knew what to do with and thus, we could not service the fleet adequately. We became a poor market.

So when the Buyback program came into play in 2003, Eureka was hit with a 73% vessel reduction and Crescent City with a 90% vessel reduction. To say the least, those ports were hit hard and the communities suffered greatly. Still today Crescent City and Brookings have no groundfish processing in their ports. In fact, Pacific Choice bought the Ice Plant in Crescent City to support what remaining groundfish and shrimp fleet remained. We maintain it still today, though we have never made a dime doing so.
It has been pointed out to the council that it takes 8 – 12 million pounds of groundfish annually to sustain a viable groundfish operation. Well, with the loss of 31 groundfish vessels at my plant, our operation was clearly in jeopardy. We were without enough fleet to keep our business afloat. Pacific could have easily closed the doors in Eureka but the commitment to the people who made the company outweighed the potential losses that would occur before we could rebuild the fleet and once again be a viable operation. That was our first move towards purchasing fishing vessels in order to provide product to keep Eureka alive. It has taken 5 years since the buy back to rebuild our operation. If this council makes the decision to turn this fishery into 100% IFQ’s to only fishermen, my 30 plus years of experience tells me we’re done for good. Individual Fishing Quotas must not happen.

This past year the whiting fishery was managed through the Federal Government and the State no longer had any jurisdiction. Prior to this season, early season whiting was to be processed by California processors and the reason for the minimal 5% allocation to an early season in California was to provide shoreside opportunity for job creation when the fishery became Americanized. The season, if it proved productive, would provide for 80 additional positions at my plant alone for roughly 50 days. This year, with a hot market and the fact that Federal Regulations allowed round whiting to be trucked out to Washington and Oregon for processing, we enjoyed 14 production days this year. On any given day there was 30 plus semi trucks running between Crescent City, CA and as far north as Seattle, Washington. Good-bye jobs and good-bye to quality products. Hello major fuel consumption, pollution, and inefficiencies. My guess next year’s early whiting season will be less than 10 days, and yes, we have to play the game along with everyone else. You might think that IQ’s will change that, they will and there won’t be a pound of whiting caught, landed or processed in California. That small amount of the quota is part of our life or death.

Things aren’t looking so bright for me or my 200 plus employees that have decent wages, health insurance, 401-k retirement and profit sharing plans are they? And I am only one plant with similar issues. Listen to the fleet that has come down for this meeting and hear what they have to say. Listen to the ones that you have never heard from as well as the same ones you have been hearing from at every council meeting for the past twenty years. I think you will hear a different message. A message that may better represent the majority of the groundfish fleet. And think about the remaining fleets too when making your decision. They will need a place to go and if we are not there and other plants are not there, what justice have we served them? With Fishermen IQ’s, this industry will consolidate between Newport, Oregon and Westport, Washington. Groundfish processing and harvesting south of Newport will die.
Like I said, please pay close attention to all public comment today as there are many confused industry participants who do not understand what IFQ’s will cost, how much fish they will get, or if they will have to pick up and move to have a place to sell. Processors have been getting out of bed 7 days a week for ever to service our fleets and provide safe seafood products to the consumers. We have built markets that never existed for products that were never desired. We do it year-round and year-round is the only way to maintain the value of this fishery or enhance it. Don’t kill us for all the hard work we have put in for most of our lives. IFQ should stand for Industry Fishing Quotas not Individual. Just think of the word and it’s connotation. Individualism, selfishness, distinctiveness, egoism, and the pursuit of personal goals rather than collective goals or interests of others. This is the management of the future of our industry? This Council has done a great job recognizing the importance of this Industry for the past twenty years, I certainly trust that you will continue to look at this fishery from the eyes of all of it’s participants and continue to make the right decision that will keep us all alive and well. We are all deserving of the access to this public resource. Fish should not be owned by anyone.

Thank you for the opportunity to provide comment.

Sincerely,

Rick Harris
General Manager
Pacific Choice Seafoods
Eureka, CA
June 2, 2008

Mr. Donald K. Hansen, Chairman  
Pacific Fisheries Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Mr. Chairman and members of the council,

My name is Dave Wright and I am general manager of two processing companies: Bandon Pacific in Charleston Oregon, and Pacific Shrimp in Newport Oregon. My family has been in the seafood industry for four generations. If an I.F.Q. program is implemented, I believe it will be the end to an era in my family and many others.

Our fishing stocks are healthier than they’ve been in years with fewer discards and if an I.F.Q. program is implemented you will have very few winners and considerable losers.

The winners will be large vessels that will enhance their whiting fishery and buy quota from smaller vessels that will not have enough quotas for a sustainable fishery. It will also be a retirement party for others.

The losers will be fishermen with 2008 business plans who lose fishing potential that will force them into other fisheries that don’t need more pressure; also processing plants that have invested millions of dollars in infrastructure, equipment, marketing, and people. We have over 250 skilled workers in Newport and Charleston that provide meaningful work that provide decent wages, health insurance, 401-k retirement, profit sharing and vacation pay. I’m sure if you see an I.F.Q. program implemented you would expect to see consolidation in the fleet but you will also see consolidation in the processing sector, loss of jobs and coastal communities will be hurt.

We must change to improve! But the cost to fishermen that are already paying 5% for the “buyback program” is going to be punishing. I understand that the I.F.Q. program could reach 3% and how much more government? Are we looking to change just to change? How many people would buy a car without knowing the cost or how long it would stay on the road?

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To change properly in my mind is to have a sustainable fishery that provides meaningful jobs, investment, and a rational approach to our industry. First, we need to change fishing periods from six two-month periods to four three-month periods. This will continue to reduce discards and allow the seafood industry to enhance its business plans. Next we need to go to full retention to account accurately pounds caught and where all products can be utilized and someday eliminate all discards. These alternatives could achieve some of the same goals as this I.F.Q. program is intended to do at a fraction of the cost. This change will take investment that can be done under a balanced and rational approach. Lastly we should invest in accurate science not models that are based on some science and who knows how many assumptions. It can be better.

I.F.Q. is not the answer. This feels like an entitlement program for some fishermen and government that will be harmful to fishermen, processors and communities. I know we’ve spent a lot of money addressing I.F.Q. but that could be chump change to the millions lost if I.F.Q. is implemented.

Sincerely,

Dave Wright
General Manager
Pacific Shrimp Company
Bandon Pacific, Inc.
Dear Mr. Chairman and Council Members:

I oppose the formation of individual quotas. I have participated in the West Coast groundfish industry as a fisherman since 1997. I am better off under the status quo. Our industry does not need another layer of unknown expense that is based on the hope that a quota system will result in more fish or higher prices. Because of good management practices, the industry will have greater access to fish in the future and our revenues are increasing every year for the last few years.

I also believe that a quota system will create a race for fish where one does not exist today. Because of overfished species, if fishermen have access to 100% of their allowable catch for the year, they will be highly motivated to get their fish out of the water before being precluded from doing so. Under the Status quo, we have the same risks of a problem occurring, but the ability for a race is far more limited and it has yet to occur.

A rational alternative is to allow vessels to stack up to two permits and provide quarterly limits. This will lessen the impacts of weather on the ability to land fish and, at the same time, will achieve the same consolidation as the proposed quota system. This can all occur without the unknown expense and complexity of the proposed quota system.

Please consider my opinion. Thank you.

Sincerely,

Jason Moon, Captain
F/V Grumpy J
Ben Chestnut  
F/V Golden Dolphin  
170 NE 69th Place  
Newport, OR 97365  
(541) 265-8008

RECEIVED

May 30, 2008

PFMC

Mr. Donald K. Hansen, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Mr. Chairman and Council Members:

I oppose the formation of individual quotas. I have participated in the West Coast groundfish industry as a fisherman and permit owner since 1957. I am better off under the status quo. Our industry does not need another layer of unknown expense that is based on the hope that a quota system will result in more fish or higher prices. Because of good management practices, the industry will have greater access to fish in the future and our revenues are increasing every year for the last few years.

I also believe that a quota system will create a race for fish where one does not exist today. Because of overfished species, if fishermen have access to 100% of their allowable catch for the year, they will be highly motivated to get their fish out of the water before being precluded from doing so. Under the Status quo, we have the same risks of a problem occurring, but the ability for a race is far more limited and it has yet to occur.

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Please consider my opinion. Thank you.

Sincerely,

Ben Chestnut, Owner/Operator  
F/V Golden Dolphin

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May 30, 2008

Mr. Donald K. Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Dear Mr. Chairman and Council Members:

I oppose the formation of individual quotas. I have participated in the West Coast groundfish industry as a fisherman and permit owner since 1984. I am better off under the status quo. Our industry does not need another layer of unknown expense that is based on the hope that a quota system will result in more fish or higher prices. Because of good management practices, the industry will have greater access to fish in the future and our revenues are increasing every year for the last few years.

I also believe that a quota system will create a race for fish where one does not exist today. Because of overfished species, if fishermen have access to 100% of their allowable catch for the year, they will be highly motivated to get their fish out of the water before being precluded from doing so. Under status quo, we have the same risks of a problem occurring, but the ability for a race is far more limited and it has yet to occur.

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Please consider my opinion. Thank you.

Sincerely,

Jeff Chestnut, Owner/Operator
F/V Prospector

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Summary of Form Letters Dated May 27, May 28 and May 30

Following are three letters from processor employees. The Council received multiple copies of each, a total of 276. The table below provides a summary of the number of each version of the letters received and the number of years the employee indicated they had been working in the processing industry.

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May 27, 2008

Mr. Donald K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Mr. Chairman and Members of the Council,

I have been working in the West Coast Groundfish industry as a processing plant worker for ________ years. My family and I depend on shoreside seafood processing for our livelihood. I understand that Individual Fishing Quotas could change the amount of groundfish and whiting coming into the port that I work in and therefore reducing opportunities for work or eliminating jobs in the processing plants completely. I already witnessed a whiting season of only 14 processing days with the allowance of Oregon and Washington processors being able to truck early season whiting away from California processing. It is clear where all of the processing power is along the coast and where the fishing and jobs will end up if you allow individual fishing quotas to happen.

Please, don’t give away our jobs. My company provides me with 401-k retirement plans, profit sharing, health insurance and a decent living wage. I oppose the formation of Individual Fishing Quotas.

Sincerely,

[Signature]

Sup Agltem F.6.e
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www.pacseafood.com
May 28, 2008

Mr. Donald K. Hansen  
Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Mr. Chairman and Members of the Council

I understand that the Pacific Fishery Management Council will soon be making decisions on an Individual Fishing Quota plan that may directly affect the fishing vessels that deliver their products to the plant that I work at. I have been working as a seafood processor for 10 years, and my family and I are totally reliant on these vessels delivering their products here.

I am also hearing that there is some consideration to fish only seasonally, so that there may not be full time work available on a year around basis as we have always been accustomed to. This will not work well as I need to work on a full time basis to support my family. The company that I work for provides full benefits, but that may be in jeopardy if we do not continue to have a year around fishery.

I witnessed what occurred with the Groundfish Buy Back program, where overnight, a lot of fishing vessels were gone, and am very fearful that this may happen again.

Please look at a plan that does not take more jobs away from the coastal communities. I do not support any plan that will disrupt or jeopardize my future. I oppose this type of Individual Fishing Quota plan.

Sincerely;

Andres jimenez.
May 30, 2008

Mr. Donald K. Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Dear Mr. Chairman and Council Members:

I have been working in the West Coast groundfish industry as a processing plant worker for 22 years. My family and I depend on shoreside seafood processing for our livelihood. I understand that Individual Fishing Quotas could change the amount of groundfish and whiting coming into the port that I work in and therefore reducing opportunities for work or eliminating jobs in the processing plants completely.

Please don’t give away our jobs. My company provides me with a decent living wage, 401-K retirement plan, profit sharing and health insurance. I oppose the formation of Individual Fishing quotas.

Thank you for considering my opinion.

Sincerely,

[Signature]

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May 28 letter from individuals participating as a fisherman/crew-member: 8 letters, example follows.

First year of participation

1979
1986
1988
1992
1992
1992
2000
2001
May 28, 2008

Mr. Donald K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Mr. Chairman and Members of the Council

I oppose the formation of individual quotas. I have participated in the West Coast groundfish industry as a crew member since 1988. I am better off under the status quo. Our industry does not need another layer of unknown expense that is based on the hope that a quota system will result in more fish or higher prices. Because of good management practices, the industry will have greater access to fish in the future and our revenues are increasing every year for the last few years.

I also believe that a quota system will create a race for fish where one does not exist today. Because of over-fished species, if fishermen have access to 100% of their allowable catch for the year, they will be highly motivated to get their fish out of the water before being precluded from doing so. Under status quo, we have the same risks of a problem occurring, but the ability for a race is far more limited and it has yet to occur.

A rational alternative is to allow vessels to stack up to two permits and provide quarterly limits. This will lessen the impacts of weather on the ability to land fish. And, at the same time, will achieve the same consolidation as the proposed quota system. This can all occur without the unknown expense and complexity of the proposed quota system.

Please consider my opinion.

Thank you.

Sincerely,

[Signature]

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May 28 letter from individuals participating in various modes, including fisherman, crewmember, processor employee, customer and supplier: 4 letters. Example follows.

First year of participation
1977
1979
1985
1992
May 28, 2008

Mr. Donald K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Mr. Chairman and Council Members:

I have been involved in the West Coast groundfish industry as a (fisherman, permit owner, crew member, processor employee, customer, supplier) since 1977. My business does not need another layer of unknown expense and complexity that will come with the proposed quota plan.

Availability of targeted species is increasing because of good management practices by this Council. As a result, it is clear to me that a permit owner’s available gross revenue will have more than doubled from the year 2000 to the year 2009.

The proposed quota system is complex and adds layers of regulatory burden on an already highly regulated business. This is additional complexity and expense that we do not need.

Thank you.

Sincerely

[Signature]

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