

Dear Ms. Lowman and Pacific Fisheries Management Council,

My name is Rob Seitz, I've been a commercial fisherman my entire adult life, and participated in the Westcoast Groundfish Trawl Fishery since 1992. I'm writing this letter about the ITQ program that was implemented for my fishery in 2011, more specifically the Adaptive Management quota associated with it. I think the council needs to work on AMP, and I think AMP quota should be used to help facilitate those on the boats working in this fishery to achieve ownership in it, this is why-

- From my observation I believe only a small percentage of ITQ landings are made by actual quota share owners on the boat and I strongly suspect that percentage is trending down since implementation. I don't have access to those records, but the council and NMFS should be able to determine this and it would be a real warning sign that the ITQ program is not working the way congress intended in terms of consolidation and community impacts.
- From my understanding the basis of a catch share is 'we will treat the resource better if we feel we have ownership'. If those making the fishing decisions don't have ownership we aren't getting all the stewardship benefits from the program.
- Small fishing communities are at risk of losing access to quota.
- The average age of the people initially allocated quota are in their 60's, few if any trawl fishermen in my generation have the financial ability to purchase the quota when they decide to retire, where will it go?
- AMP was one of the primary reasons the PCFFA's (Pacific Coast Federation of Fishermen's Associations) law suit against the ITQ program citing community impacts was dropped, yet nothing has been done with it to mitigate the social impacts.
- The hired captains and deckhands didn't receive any representation at the council level during the allocation process.
- Participating in a fishery in decline has made it harder for my generation to achieve ownership in this fishery. The Buyback eliminated 50% of the jobs, the decade between conception and implementation of IFQ artificially raised permit prices, although many hired skippers were on the ocean every year of the window period we received zero allocation.

Working in the Westcoast Trawl fishery has been extremely challenging with diminishing rewards. Since it was declared a federal disaster in 2000 the hired captains and crew have had to learn to adapt to many changes in order to bring us to our current 'sustainable' rating. It is sad and frustrating to know that now we have turned our fishery around and made it a model of what is possible-from disaster to sustainability in a decade and a half-yet the group that is most responsible, who were on the ocean figuring out how to make the fishery work in the face of all the changes has received little or no allocation. It's near impossible for hired captains & crew to make it to the meetings and advocate for themselves, compounded by the fact the boat-owner (their boss) is likely advocating against them. Doing the right thing is not always popular, AMP will probably not be, but getting ownership for those working in the fishery is the right thing. Please make the decision to start working in that direction. I would welcome the opportunity to work with the council on a use for AMP fish that would bring about a lasting solution to the 'share-cropper' effect catch share management seems to create.

Thanks,

Rob Seitz

F/V South Bay