

Paul Kujala
F/V Cape Windy
1715 Southwind
Hammond, OR 97121

Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 Ambassador Place, Suite 101
Portland, OR 97220

RE: Widow Rockfish Reallocation

Dear Chair Lowman & Council Members,

My name is Paul Kujala and I am a life-long trawler from Warrenton,OR. I was involved in the development of the trawl ITQ program and continue to fish non-whiting groundfish year-round and I'm engaged in the Council process. I am writing to you today because I do not believe that the current list of reallocation alternatives presented in Attachment 2 provides for a reasonable range as required by the National Environmental Policy Act (NEPA). Further Magnuson Act requires consideration of several factors when making allocations. None of the alternatives truly consider:

Current participation
Employment in the harvesting and processing sector
Investments in and dependence on the fishery

To meet the objectives of Amendment 20 as well as MSA, I believe it is necessary to include more recent participation than 2003. And while Alternative 3 includes the years 2004-2010, there was no directed fishery for widow rockfish in those years. So essentially, this alternative is only further representing more bycatch, which is not the intent of reallocation. If the Council is only interested in representative bycatch harvest than you should stick with the status quo and avoid all the workload (and controversy) associated with reallocation because status quo does just that – represents bycatch.

Amendment 20, however, is about rationalizing a fishery to bring the greatest benefit to the stakeholders, communities and nation. I do believe the council should consider activity in more recent years than 2003 or identify other reasonable calculations of recency and dependence.

After all, more years of fishing has passed since the window years than the actual window years themselves.

So the question becomes “How do we allocate on history during a period where there was no directed Widow fishery?”

Widow is a non-whiting species, so the best way to model dependence on the non-whiting groundfish trawl fishery is to use gross revenue of permits per year (non-whiting groundfish trawl) as a proxy for widow. This makes sense because there is no recent history for a directed widow fishery. The gross receipts of deliveries for non-whiting trawl will show dependence on the current groundfish fishery. I believe this is the closest representation we can get to fairly allocating on directed widow catch.

Utilizing this type of formula has several advantages:

- 1) Widow was rebuilding and not targeted during these years being considered. Therefore no one is being rewarded for either fishing “dirty” or increasing effort after the window years just to build history in hopes of receiving more quota.
- 2) This is still in keeping with the rationale of the initial allocations, just using a substitute for information that we do not currently have (and never will).
- 3) This formula will make sense moving forward in the future when additional species come out of rebuilding plans
- 4) It allows the trawlers that have fished and continue to fish to share in some of the benefits of the hard work and sacrifice they have done to keep infrastructure, jobs, and markets going throughout the tough times

For these reasons, and to meet the Magnuson Act required considerations when allocating quota, I am advocating a for an additional alternative. **Alternative 3a** is similar Alt. 3, but that includes gross receipts from 2003-2010 as a substitute for direct history.

Please add the additional options for analysis:

Alternative 3a: Instead of landings history during the window period use gross trawl (non-whiting) groundfish landings

Thank you for your consideration.

Sincerely,

Paul Kujala