Consideration of canary allocation under Amendment 20, trawl rationalization

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1. Reasons why Adaptive Management is NOT the answer:
   
   - Adaptive management is a temporary fix, not an answer.
   - This use of AMP only puts off the problem to another day.
   - AMP is only pounds; fishermen still have a zero allocation of shares.
   - It would make it extremely difficult to make any long-term business plans.
   - The allocation of pounds would not be responsive to a change in the OY.
   - AMP pounds should not be used for permanent allocations, or even for two years.
   - Canary shares will not be readily available during the first two years.
   - Canary, when available, will be costly and out of reach for most smaller vessels.

2. Reasons why I support the Preliminary Preferred Alternative:

   - This would be a canary-specific solution.
   - The PPA could be a permanent fix to the canary allocation problem.
   - The majority of the fleet, coastwide, would benefit.
   - It gives vessels without canary allocation a starting point from which to work.
   - It solves some of the disconnect between target species and bycatch.
   - Using the PPA would have a long-term, stabilizing influence on local communities.
   - Equal sharing may make more quota share available to everyone.
   - The PPA plan was initially recommended by the TIQ committee.
   - The TIQ program implementation should not be delayed by using the PPA plan.

And lastly ... it’s the “fair” thing to do!