

**FISHING VESSEL OWNERS' ASSOCIATION  
INCORPORATED**

ROOM 232, WEST WALL BUILDING • 4005 20TH AVE. W.  
SEATTLE, WASHINGTON 98199-1290  
PHONE (206) 284-4720 • FAX (206) 283-3341

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February 12, 2002

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 200  
Portland, OR 97220-1384

**RE: Proposed Groundfish Amendments**

Dear Dr. McIsaac:

The following groundfish amendments would be compatible with the Rationalization Committee's recommendations for fixed-gear operations. The proposed action would affect fixed-gear limited-entry sablefish-endorsed and non-endorsed operations that participate in the 300-pound daily trip-limit fishery.

Currently, 12 percent of the limited-entry fixed-gear quota is set aside to be accessed by limited-entry fixed-gear vessels both endorsed and unendorsed for sablefish. This proposal would eliminate this fishery and add a fourth tier endorsement for those permit holders that are not endorsed for the tiered fishery.

**Proposal #1:** End the daily trip-limit fishery for sablefish endorsed fixed-gear limited-entry permit holders. Make a determination of what percent of the 15% set-aside has been caught by this group the last two years and add an equal amount to each of the existing tiers. The remaining portion of the set-aside would belong to the unendorsed fixed-gear license holders. Allocate the remainder equally among this group as a new tier 4.

OR

**Proposal #2:** For the endorsed permit holders who participated during the last two years in the 300 lb. set-aside fishery, allocate equally their collective share of the 15% set-aside. Add this amount to their existing tier. The remaining portion of the 15% set-aside would belong to the unendorsed fixed-gear license holders. Allocate the remainder equally among those who participated from this group as a new tier 4.

This action would be an amendment to the current tiered program and thereby, would not be a new IFQ program.

Dr. Donald McIsaac

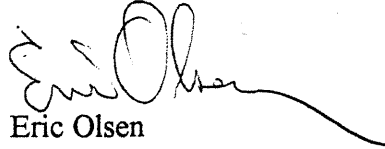
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Some of the supporting reasons for this are:

- (1) The current daily trip limit fishery generates more high grading of sablefish at a time of resource decline. This proposed action would tend to force a person to fish the allocated 4<sup>th</sup> tier in a rational-like basis more probably in one trip rather than many small costly trips.
- (2) The original intent of the 300 lbs. daily trip limit was to allow a bycatch of sablefish with the directed rock fish catchers. The new restriction on rock fish basically eliminates most directed rock fish operations by hook and line vessels. Hence, there is no need for the bycatch allowance.
- (3) The current tiered amounts will be reduced by 38 percent for the 2002 season due to needed cuts in quota. Eliminating the 300-pound daily trip limit allows a more rational harvest of quota. The 300 pound trip limit encourages more trips on the water at increased costs and potentially, more bycatch of rock fish. Allowing for a new tier and consolidation of the 12% set-aside could reduce rock fish retention as the fleet would more probably target deeper water for their sablefish.

Sincerely,



Eric Olsen  
President

cmb