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Michele Longo Eder
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RECEIVED

AUG 20 2002

August 19, 2002

PFMC

Dr. Donald O. McIsaac
Executive Director
Pacific Fisheries Management Council
7700 NE Ambassador Place
Suite 200
Portland, OR 97220

Re: Allocation Committee Meeting
August 28-29, 2002

Dr. Hans Radtke
Chairman
Pacific Fisheries Management Council
P.O. Box 244
Yachats, OR 97498

Dear Dr. McIsaac and Dr. Radtke:

I have not seen an agenda for the allocation committee meeting on August 28-29, but I thought I would ask you to include the following as a discussion and action item on the agenda. Please also include the subject of this letter as an agenda item for the GAP at the September Council meeting, and consider it a public comment for the September briefing book under the appropriate agenda item.

Recognizing that a part of the role of the allocation committee is to examine ways of reducing effort by the groundfish fleet in the groundfish fishery, I would suggest that the regulations and/or the management plan be amended as follows:

To allow the fixed gear fishery to stack more than (3) three permits per vessel, up to (6) six permits per vessel

First and foremost, from a conservation standpoint, allowing an increase in the number of permits stacked in the fixed gear fishery, from three to six permits, will assist in reducing fishing effort on rockfish and associated bycatch. As I understand it, the stacking of fixed gear sablefish permits does not allow for any stacking of other groundfish limits associated with the permit, thereby lessening this fishery's impact on other groundfish, and in particular, upon species of concern.

Secondly, there are people in the fixed gear fishery who would sell the sablefish endorsed permits, but because of the restriction on the number of permits that can be stacked, have a limited market in which to sell them. Conversely, there are buyers who will purchase permits, but have no market because of the current limits on numbers of permits allowed to be stacked.

We encourage the Council to act proactively, both in regard to the effect on species of concern, and in regard to the economic viability of the businesses in the fishery. Allowing an increase in the number of permits stacked will encourage the survival of those that remain in the fishery, and provide an economic benefit to those who wish to, or because of other business pressures, are forced to exit the fishery.

It may be of use to illustrate to you what the decrease of limits have been in the fixed gear fishery for Sablefish for the last three years:

	<u>2000</u>	<u>2001</u>	<u>2002</u>
Tier 1	81,000	57,000	36,000
Tier 2	37,000	26,000	16,500
Tier 3	21,000	15,000	9,500

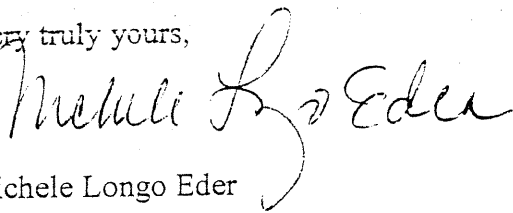
As you will note, the poundage associated with each of the tiers has decreased by more than 50% in the last 3 years. Although we are aware that there may be an increase in the amount of sablefish allowed to be caught in 2003, this increase, if indeed it occurs, may only be temporary, and in any event, the amount of any increase cannot compensate for the significant loss of income during the past two years.

Although the Council is primarily concerned with groundfish, and the effect of restrictions in the groundfish fleet, be aware that the West Coast fishery as a whole is experiencing an overall depression. Depressed prices for salmon, shrimp, crab and tuna are adding to the general poor outlook for fisheries. There will be a smaller fleet regardless of what this Council does, and regardless of what happens in groundfish. This proposal, however, will provide some economic relief both to those who choose to leave, and those who choose to stay.

The limits on the number of permits stacked was initially justified, in part, by a concern that the fixed gear sablefish endorsed fleet not become "too" small, or "too" consolidated. Given the fact that the stated goal of the Council in its long term management plan is to reduce the fleet by 50%, it would appear that allowing an increase in the number of permit to be stacked in this fishery is a specific action that this Council can take now, and by emergency regulation if necessary, in order to meet one of its long term goals.

Because of prior commitments, I will be unable to attend the Committee's meeting on August 28th, but I would be available to join the meeting by conference call and answer any questions by phone on the 29th.

Very truly yours,

A handwritten signature in cursive script that reads "Michele Longo Eder". The signature is written in dark ink and is positioned to the right of the typed name.

Michele Longo Eder

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