

To Whom It May Concern:

The subject of how to allocate some of the ground fish resource is of great concern to me. My wife and I are among a small group of fishers that started hook and line bottom fishing in 1994 and continued until we were shut out in July of 1998. We would very much like to continue our efforts of utilizing the most cost-effective system of supplying quality rockfish to the market place. It was proven during those years that quality rockfish, properly taken care of, would be in great demand once the general public had a chance to purchase it. That demand translated into more value per fish than any other method available. In addition, the system of hook and line fishing promotes the easy targeting of specific types of rockfish that in turn keeps the troubled species from any unnecessary stress.

I know that the job of trying to allocate a limited entry permit plan will not be an easy one and I don't have any quick fix ideas to add. I would like to request that importance be given to deliveries during those years previous to the closure in 1998 with minimum deliveries of at least 1,000 pounds. I would also like to point out that there were a lot of people who were aware of the impending closure and rushed to make some rock fish landings in order to be eligible for any future permits with the sole purpose of trying to get something to sell. Unfortunately, buying and selling of permits has become a lucrative business to the detriment of entry level fisherman. It would be nice if some time in the future, permits could become non-transferable to anyone other than a close relative with a fishing history. It would be better for the state to obtain the permit when, and if, it was not renewed and let them have lotteries in order to reissue them.

I respectfully request that the matter of limited entry permits for hook and line bottom fish be given high priority especially in light of the problems with the salmon fishing sector.

Sincerely,

Gene & Elaine Holt,

Coos Bay, OR

Item E.4
Amendment 22
Limiting entry in the groundfish fishery.

From:
John Law
Wild West Commercial Fishing
2795 Massachusetts Ave.
Lemon Grove Ca. 91945
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WILDWESTJL@YAHOO.COM

Council Members,
I have supported the idea of a limited entry permit for the open access fleet from the onset of the council process. However, in keeping with the spirit of "participating in the process" I would like to ask that the council does not deviate too far from the original "strategic plan" document.
When the council process started I tried to be involved, sent comments, spoke to members by phone, all in the hope that I would be able to continue to fish again at some point. The information in the "strategic plan" convinced me to stay in the fishery. According to the plan for the open access fleet I would qualify for a permit. With this in mind I continued to fish at what ever level I was allowed. I have participated in the observer program and kept up with the changing regulations via E-mail. It would be unfair at this point to make a drastic change to the "strategic plan".
The only thing that I am worried about is implementing a licensing process that would give permits to those who are no longer in the fishery. I have watched this happen with every limited entry program in California. A fisherman should not be granted a permit based solely on his past participation. Only those who are active now and have been active during the council process should be considered for licensing.
Thank You for considering my comments. John Law.

Mr. Donald Hansen
Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Ste. 101
Portland, Or. 97220

Laura Deach
318 Shark Reef Rd.
Lopez, WA 98261

Dear Chairman Hansen,

Please consider the following option for limiting entry of the OA fleet:

Amend Amendment Six to allow any open access gear type to be used on a limited entry fixed gear permit. Close the open access fishery. Add the open access allocation to the limited entry fixed gear allocation and allow fishers to purchase an existing permit with its associated catch limits.

When deliberating please consider the following points:

- **Discards:** Closing the OA fishery reduces to zero both target species discards and bycatch discards. Permitted or not, placing observers on these vessels is problematic which compounds the collection of accurate catch and discard data. With today's restrictions, accurate data is essential to stock rebuilding.
- **Economic:** The OA fleet adds a small portion to the overall value of the west coast groundfish industry. Conversely, there are economic costs to maintaining even a portion of this fleet.
- **Monitoring:** Creating 200 more permits will permanently increase monitoring costs, including state and federal funds used to observe deliveries, process fish tickets and compile data. The current fishery cannot be monitored reliably nor properly. Zero new permits incur less cost than 200 new ones.
- **Enforcement:** There are 404 LE permits. Creating 200 more permits will permanently increase enforcement burdens and costs. The current fishery cannot be enforced adequately. Zero new permits require less enforcement than 200 new ones.
- **Management:** You will still have the problem of small daily trip limits. Tinkering with them all year long, each year costs management time and dollars. After limiting entry, an ITQ program will eventually be requested by this group. Developing an ITQ program costs substantial time and dollars.
- **Buyback:** Ninety groundfish permits were bought back by the government. This was probably not enough. Now the council wants the government to create 200 more groundfish permits. This mystifies common sense.
- **Allocation:** One of the ongoing results of trip limit management is a slow reallocation of the resource over time. Top producers in the LEFG fleet have had catches reduced by 50% or more. During the same time period, OA participants, in some cases, have had

catches increased from 0 to the level of a mid-tier permit. Returning quota to the LEFG fleet helps rectify this inequity.

- **Personal Responsibility:** Through regulation, the council told the LEFG fleet to be personally responsible by allowing us to purchase and stack additional permits. Many people have individually born this expense to regain lost poundage or increase catch. Asking OA participants to purchase an existing permit is no different. They have essentially had a 13 year extension compared to the requirements of LEFG fleet.
- **Paranoia:** If you create 200 more permits and then decide to add them to the current LEFG fleet, there will be another reallocation over time. A reduction in the overall LEFG trip limits will have to occur. The OA allocation added to LE allocation divided by another 200 permits equals less for more once again.

Sincerely,
Laura Deach