

COMMENTS ON NON-AGENDA ITEMS

This agenda item provides opportunity for advisory bodies, management entities, and members of the public to submit comments to the Council on matters that are not part of the scheduled meeting agenda. Such comments may be comprised of both written documents and oral testimony.

Council Task:

Discussion.

Reference Materials:

None

Agenda Order:

- a. Agenda Item Overview
- b. Advisory Body and Management Entity Comments
- c. Public Comment
- d. Council Discussion of Comments as Appropriate

Chuck Tracy

PFMC
10/23/14

From: **Tony Vultaggio** <acvtony@gmail.com>
Date: Mon, Nov 3, 2014 at 10:48 AM
Subject: Agenda Item B.1.C general open comment
To: pfmc.comments@noaa.gov

Pacific Fishery Management Council
7700 NE Ambassador Place Suite 101
Portland OR 97220-1384

RE: Gear conflict between IFQ trap boats and Southern CA LE community.

Chair and Council Members:

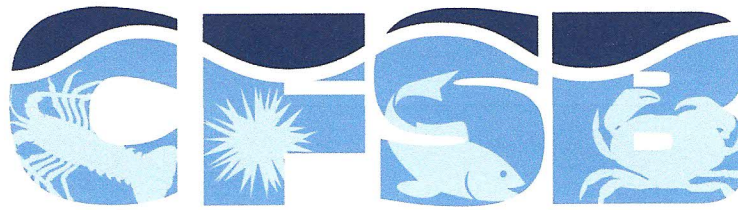
My name is Tony Vultaggio and I would like to express my concern regarding the situation and fishing methods by our visiting IFQ trap boats.

I am a small boat owner/operator that currently fishes fixed gear for Sable fish out of my home port of Santa Barbara California. Over the past few years we have been able to cooperate with IFQ trap boats. In the last two months these boats have become very aggressive in their fishing methods. I have been forced out of my traditional fishing grounds due to unattended fishing gear. While these boats are off loading their catch they leave gear at sea. If I were to set my gear over theirs it would be very dangerous for me and my crew if we were to get tangled. I would also like to touch on the fact that in the pass they gave us room to work. This year they would see us working an area and move in on us as soon as we would leave to off load. When we return the following week there would be multiple sets of gear in that area.

I would also like to express concern regarding "Use of an area". Please look at the impact these boats have on a small area. Focusing on a Meta population during spawning season could leave a negative footprint on this fishery. I am grateful to be able to fish in this fishery and make an honest living. I look forward to many years of a well managed and balanced fishery.

Sincerely,

Captain Tony Vultaggio
F/V Rock Steady
avctony@gmail.com
[\(805\) 637-3425](tel:(805)637-3425)



Commercial Fishermen of Santa Barbara

Commercial Fishermen of Santa Barbara, Inc. 6 Harbor Way, #155 Santa Barbara, CA 93109 www.cfsb.info

November 4, 2014

RE: Gear conflict between IFQ trap boats and Southern CA. LE
longline community

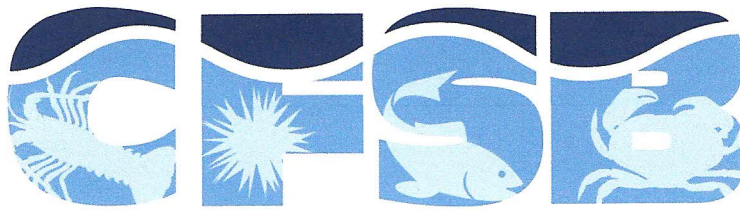
Madam Chair and Pacific Fisheries Management Council Members:

My name is John Colgate. I am speaking to you as Vice President of CFSB and am representing the LE longline fleet of the Pt Conception management area. I have been a full time commercial fisherman for the last 42 years.

The purpose of this letter is to bring you up to date on the escalating gear conflict between the visiting IFQ trap boats and our LE longline community.

Over the last 2 months these visiting trap boats have started targeting the areas the longline community fish, the 400f to 600f depth range. The major conflict arises when these trap boats leave these areas, they also leave their miles long strings of gear in the area. The location of this unattended gear is unknown. It is often right in the middle of our fishing grounds.

This situation happened to me last month. I had been fishing an area and was seen there by one of the trap boat. After I left to unload, the next day the trap boat moved into the area and worked that area for several days. When I came back to fish my area, just before I was about to set, another longline boat from my home port called to say he just found a string of unattended gear ½ mile from me. What we figured out was when the trap boat left they left approximately 3 strings of gear, over 6 miles of gear, right through the middle of this area effectively blocking me from setting my area. If I hadn't inadvertently found this out I would have set over their gear creating an



Commercial Fishermen of Santa Barbara

Commercial Fishermen of Santa Barbara, Inc. 6 Harbor Way, #155 Santa Barbara, CA 93109

www.cfsb.info

extremely dangerous situation for myself and my crew if we had gotten entangled with it. This unacceptable risk is what I am here to talk to you about.

This was not an isolated incident. This has also happened to several of my fellow fishermen. Fortunately no one has gotten tangled with this gearyet.

Our LE fishing community feels this dangerous situation is something that must be delt with immediately. With the slightest amount of wind this unattended gear is invisible on our radars.

I would like to formally ask you to put this matter on the council's agenda to be discussed in closer detail as soon as possible. We request that these trap boats be required to return with all their gear to port when they unload.

Thank you for this opportunity to express our community's views. We have a desire to work out a compromise on this issue. If you have any further questions you may contact me at the above address.

Sincerely,

John Colgate

Vise President CFSB

May 20, 2014

PFMC Meeting June 2014 Agenda Item F.2.c

Pacific Fisheries Management Council
7700 NE Ambassador Pl., Suite 101
Portland, Oregon 97220-1384

Madame Chair and Council,

This letter is regarding the “VMS enhancement” proposal by the Office of Law Enforcement to increase the VMS “ping rate” from once hourly four times an hour. This proposal is unacceptable because it fails to achieve the enforcement goals of the OLE and negatively impacts west coast commercial fishermen.

This action will not achieve the OLE’s goal of better monitoring GCAs. I agree that it is important that the OLE has all the tools necessary to monitor and enforce restricted fishing areas and I assert that they have more than adequate resources to do so. The OLE has NOAA research vessels, coast guard cutters, coast guard helicopters, CFW patrol boats, CFW spotter planes, drone aircrafts, and a real time GPS monitoring system (VMS) on every boat with the ability to transmit every couple minutes. The OLE already has the ability to increase the ping rate of any vessel at any time they choose.

I am knowledgeable about the details of the VMS situation because I was recently engaged in a court case with the OLE where VMS data was the entirety of the OLE’s case. The ALJ court ruled in my favor and stated that VMS data alone did not prove incursion and that additional investigation and documentation was required. It is apparent that this proposal is a retaliatory action for the loss they suffered in the ALJ court as well as an effort to continue using VMS as sole evidence instead of following the ruling of the Justice to employ additional verification procedures.

This proposal will negatively impact the west coast fishing fleet because the cost of the increased rate will be charged to the commercial fishermen, who will gain nothing and have done nothing to incur an additional expense. The notion that the price increase is small is a bogus justification when there are hundreds of “small costs” that add up to a very high overhead in the commercial fishing industry. An increased ping rate on the VMS will also increase a vessels battery usage, decreasing the life of the batteries and costing the fisherman even more.

It is important to recognize that even though the OLE claims that an increased ping rate is crucial for enforcement of the GCAs, they do not suggest extending the program to the recreational fishing sector. Recreational fishermen, who go about unmonitored with no tracking or catch data, land 80% of the rockfish in Southern California. This selective law enforcement criminalizes commercial fishermen, who have zero incentive to break fishing laws. It shows that GCAs are directed primarily toward commercial fishermen, who are the vast minority; this is either a huge oversight in fisheries management or clear discrimination. Either way, this proposed increase in the VMS ping rate for commercial fishing vessels is absurd. This proposal will not help the OLE protect closed areas and it hurts commercial fishermen. The only winner will be the VMS service provider who stands to increase profit by 400%. I respectfully suggest that this proposal be dismissed.

Sincerely,
Jason Robinson
Commercial Fisherman, Limited Entry Fixed Gear
Southern California Groundfish Association

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

November 5, 2014

Madam Chair and members of the Council:

My name is Forrest Braden, owner operator of the F/V Pisces participating in the limited entry (LE)fixed gear sablefish fishery in the Pt. Conception management area.

Although this is my first time addressing the Pacific Fishery Management Council, I've had exposure to the North Pacific Council and it's processes and appreciate the complexity of managing our nations fisheries.

I'd like to touch on an issue related to trap boats fishing shore-based sablefish IFQ in the Conception (South of 36 degrees) management area.

I'm concerned about the concentration of fixed trap gear this year on the primary grounds the sablefish limited entry (LE) fleet out of Santa Barbara has traditionally fished. I understand that fishing grounds are not proprietary. However, I'm worried that the attributes of the IFQ sablefish fishery allow for a version of a monopoly over other gear groups.

By illustration, during September and October most Santa Barbara LE boats were blocked by trap gear from fishing areas they had previously labored to prospect and develop. Either trap gear was present, or the area had been recently worked over hard by trap lines. (I've included screen shots of AIS vessel tracklines to give a sense for what's happening.) Because IFQ vessels can fish off of tens of thousands of pounds of quota each, with no weekly or bi-monthly restrictions, they can set up shop in an area and rotate through their gear until the quota is filled or there are no more fish left. They may also legally leave gear in the water up to a week which allows them to travel to port and offload while blocking anyone else from setting the area.

Unattended gear adds an additional concern. Because flags marking gear are not always easy to see it's very possible for us to lay over gear without knowing it. We typically hail for other commercial fishing vessels in the vicinity on channel 16 before we set, but if the vessel isn't within VHF radio range, there is no sure way for us to know about their gear. Trap gear is much heavier than longline gear and tangling in it isn't safe. If we tangle we are likely to lose some of our gear which not only costs to replace it, but costs the value of the fish that that gear would have harvested.

I'm also concerned that large, concentrated removals in a short time over a very small geographic area are going to leave local areas of depletion, at least in the short term, but possibly long term. Even if IFQ boats move on, it could be difficult for our grounds to rebound. The pots are fitted with escapement rings that juvenile fish can pass through, but fish big enough to spawn cannot which I fear may be having long term effects on the spawning biomass.

I would like to ask that the shore-based IFQ program be amended so that vessels must remain within radio contact of their gear and/or retrieve their gear before leaving an area. I'll be looking forward to the opportunity to elaborate on the potential for negative impact the IFQ fleet has on limited entry and other sectors.

Respectfully,

Forrest Braden
F/V Pisces

Pt. Sal to Santa Cruz Island x Map Results | Wind, Forec... x Southern California - Surf... x Live Ships Map - AIS - Ves... x

https://www.marinetraffic.com

Apps NOAA Upper WindAlert SF Map Results | Wind, ... Cal Southern California ... WF Gunlock Reservoir B... Killer Whale (Orcinu... Killer Whale Sounds NOAA Rosa

MarineTraffic Live Map Vessels Ports Photos Participate Services Vessel/Port Sign in

Cookies and local storage help us deliver our services. By using our services, you agree to our use of cookies and local storage. Got it

(This is the same vessel as previous view fishing a little lower)

10/16/14
3 separate vess

Remove Ads

NEWS

Google

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Live Ships Map - AIS - Ves x

https://www.marinetraffic.com

Apps NOAA Upper WindAlert SF Map Results | Wind, ... Cal Southern California ... WF Gunlock Reservoir B... Killer Whale (Orcinu... Killer Whale Sounds

MarineTraffic Live Map Vessels Ports Photos Participate Services Vessel/Port Sign in

Cookies and local storage help us deliver our services. By using our services, you agree to our use of cookies and local storage. Got it

10/1/14

10/28/14
Same vessel

N34°18'17.55"
W120°53'36.79"
(34.3049, -120.8936)

101

Remove Ads

San Miguel Island

Santa Rosa Island

Track Options

Google

Taxes!!!
safety g
2014

8:20 AM
10/1/2014



Fwd: Dennis Rydman

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Wed, Nov 5, 2014 at 12:04 PM

To: _NMFS PFMC <nmfs.pfmc@noaa.gov>

----- Forwarded message -----

From: **Greg Shaughnessy** <gshaughnessy@oceancos.com>

Date: Wed, Nov 5, 2014 at 11:56 AM

Subject: Dennis Rydman

To:

It is with profound sadness that we announce the sudden and unexpected passing of Dennis Rydman, the President and CEO of Ocean Gold Seafoods Inc.

Dennis was a lifelong fisherman, father, grandfather, and the patriarch of the Rydman family. He was a strong supporter of the Westport Washington area and a friend to the coastal fishing communities in the Pacific Northwest. Dennis was passionate about his family, his company, his friends, and the commercial fishing industry. His presence will be sorely missed.

Ocean Gold Seafoods Inc., a commercial industry leader, will continue in the strong tradition that was Dennis' legacy.

We would like to express our deepest condolences to his wife Jacquelyn Rydman; his sons Mark, Eric and Ross, as well as his precious grandkids and the entire Rydman family.

The Ocean Gold Team has suffered a tremendous loss.





OCEAN*cold*



OCEAN*protein*



OCEAN*express*

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Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220
Phone: [503-820-2280](tel:503-820-2280)
Toll Free: [1-866-806-7204](tel:1-866-806-7204)
Fax: [503-820-2299](tel:503-820-2299)
Twitter: <http://Twitter.com/PacificCouncil>

October 25, 2014

Pacific Fisheries Management Council
7700 NE Ambassador Pl., Suite 101
Portland Oregon 97220-1384

Madame Chair and Council,

I would like to express my concerns about the ITQ fishery in the Point Conception area, primarily the sablefish fishery. I have been fishing fixed gear for sablefish in the Point Conception area since 2009. In the past two years we have seen an influx of ITQ boats in our area. These large, company owned boats come down from the Pacific Northwest and take large quantities of fish out of a relatively small area in a short amount of time. These boats generally show up in our area in the fall when the fish are schooled together to spawn. The use of grading rings on their pots assures they catch the larger, more valuable, fish. Unfortunately these larger fish are the breeding population that produces the most spawn. I do not believe this practice is sustainable for the fishery and fear that if it continues the stock will not be healthy enough to be harvested.

Another problem we are having is a conflict with their gear. In the past the boats have stayed a good distance from our traditional fishing areas, this year these boats have been fishing very aggressively following local boats around and setting miles of pot gear on our traditional areas, rendering these areas unfishable or blocked to the local fleet. This gear is often left for days at a time unattended. Left unattended, there is virtually no way for us to know how much or exactly where there gear is. This poses a potentially dangerous situation for our vessels and crew. Entanglement with opposing gear could result in injury to crew, mechanical breakdown of the hauler or, at the least, loss of gear. I am asking the Coast Guard representative to take this complaint regarding our safety seriously and explore possible solutions to alleviate this issue that the ITQ fishery has imposed on us.

Thank You,
Jason Robinson
F/V Miss Conception



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

RE: Agenda Item B.1. Open Public Comment

November 5, 2014

Dear Chair Lowman & Council Members

Midwater Trawlers Cooperative (MTC) represents 23 mid-water trawl catcher vessels that primarily participate in whiting and groundfish fisheries on the west coast as well as pollock and cod fisheries in the Bering Sea and Gulf of Alaska.

I am writing to you today on behalf of the MTC membership to express our sincere gratitude to the Pacific Council and the National Marine Fisheries Service (NMFS) for their extraordinary efforts to address the recent crisis in the whiting mothership fishery sector.

As you know, the whiting mothership sector closed quite suddenly and unexpectedly on October 11th when several catcher vessels simultaneously delivered tows of whiting which contained "lightning strike" amounts of darkblotched rockfish. The mothership cooperative manager immediately closed the fishery upon realizing that the 6.3 mt hard cap of darkblotched rockfish had been exceeded. At the time of the unexpected closure over 21,000 metric tons of whiting was stranded in the water. Nine MTC vessels still had close to 50% of that stranded fish equating to lost revenue for the vessels, their crews, their associated communities and even NMFS through the cost recovery program.

My colleagues and I worked together tirelessly with NMFS and Council leadership and staff to identify a reasonable approach to reopen the mothership fishery without impacting any other sector or fishery in the process. When NMFS determined that they did not have the legal authority to transfer the needed darkblotched in a timely fashion without Council guidance an

emergency Council meeting was called. It has not been lost on me, my colleagues or any of the MTC members just how exceptional this action was.

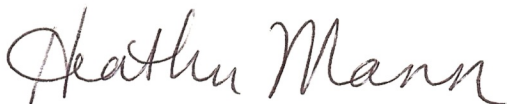
Thank you for recognizing the importance of this fishery and the economic damage that would have occurred if the fishery were not reopened quickly. I am proud that the fix that was identified and implemented did not negatively impact any other sector or fishery and did not cause any biological or conservation concern whatsoever for darkblotched rockfish.

The mothership whiting sector started the season with 6.3 mt of darkblotched rockfish to catch 62,249 mt of whiting. A tribal reapportionment on September 12th, 2014 of 6,000 mt more brought the sector's total allocation to 68,249 mt. Bycatch hardcaps are not adjusted upwards based on tribal reapportionments. The cooperative members did an excellent job of avoiding darkblotched rockfish until the morning of October 11th when several vessels delivering to three different mothership platforms caught almost 5 mt of darkblotched rockfish simultaneously. Transferring additional darkblotched rockfish into the mothership sector was the only way to reopen the fishery and have a chance to harvest the stranded fish.

Darkblotched is projected to be rebuilt in 2017 and the rebuilding paradox confronts all sectors that interact with the species. Identifying ways to increase management flexibility to respond to situations like the one that occurred in October without negatively impacting other sectors or fisheries is imperative moving forward. I look forward to working with Council leadership and staff as well as NMFS to meet the Magnuson Act National Standards to achieve optimum yield and benefits to the nation on a sustainable basis.

Thank you for your remarkable efforts to address this situation. Your dedication to sound fisheries management and a robust and transparent process is very much appreciated and will not soon be forgotten.

Sincerely,

A handwritten signature in dark ink, reading "Heather Mann". The signature is written in a cursive, flowing style.

Heather Mann
Executive Director

From: **Michele Longo Eder** <michele@michelelongoeder.com>
Date: Wed, Nov 5, 2014 at 10:49 AM
Subject: Public Comment Agenda Item B.1
To: "pmmc.comments@noaa.gov" <pmmc.comments@noaa.gov>, Frank Lockhart - NOAA Federal <frank.lockhart@noaa.gov>, "mark.helvey@noaa.gov" <mark.helvey@noaa.gov>, "dmlowman01@comcast.net" <dmlowman01@comcast.net>
Cc: Ginny & Herb Goblirsch <ginny.goblirsch@gmail.com>, Heather Mann <heathermunromann@gmail.com>, Jennifer Stevenson <stevensonjrjs@gmail.com>

November 5, 2014

Agenda Item B.1

Madame Chair, Members of the Pacific Council,

On October 2nd, 2014, the community of Newport, OR was notified by a letter from the 13th District Commander of the Coast Guard, Richard T. Gromlich, that effective November 30th, 2014 the USCG air facility would be closed and the rescue helicopter stationed in Newport, OR would be eliminated. The Newport helicopter is to be first moved south to North Bend, more than an hour's flight time from Newport. The decision by the Coast Guard Commandant to cut this air facility is particularly shocking in that he failed to engage the public in any public process prior to his decision. This reckless decision by the Coast Guard Commandant will take effect at the start of the Dungeness crab season, identified by the National Institute of Occupational Safety and Health as one of the deadliest in the nation.

In the frigid waters of the Pacific, an hour in the water will result in a significant increase in fatalities. Hypothermia sets in, limbs become immobilized, and drowning occurs. Recently, there were 5 tourists rescued from the rocks from Fogarty Creek State Park. Without the swift assistance of the Newport based U.S. Coast Guard helicopter, those tourists had less than an hour before the waves and tide change washed them from the rocks.

And it gets even worse. Two of the helicopters which currently rotate out of North Bend are going to be transferred to another region of the country (or dismantled for parts). This leaves the cold waters of the central Oregon coast with severely diminished fast response helicopter recovery assets.

The helicopter facility in Newport, OR is essential to the health, safety and well-being of all our coastal ocean users. Fishermen, commercial and recreational, ply our waters. Families with children, residents and tourists, stroll the beaches and climb on rocks. Surfers and kayakers ride the waves. Ocean researchers, from state and federal agencies, private enterprise, and universities, venture out to sea. In addition, loggers, deep in the woods, harvest natural resources, and need helo resources because of their inaccessible locations. Our first responders rely on the US CG helicopter in assisting in ocean rescues, and as back up for their own crews.

Despite requests from community leaders and the public in a town hall meeting on October 20th, we were informed by Rear Admiral Richard T. Gromlich that the decision to eliminate the Newport air facility had been made, and would not be changed. Oregon's congressional

delegation then spoke with the Commandant of the Coast Guard, Admiral Paul Zunkunft, and received a two week reprieve from the closure, which is now scheduled to happen on December 15, 2014.

On behalf of Newport Fishermen's Wives, we ask you to write a letter to Admiral Paul Zunkunft and notify him of your opposition to the closure of the air station in Newport, OR.

Set forth below are **a sample** of the letters and resolutions of support from various elected representatives, agencies, organizations, and individuals, opposed to the elimination of the CG helicopter air facility. We ask that you join in this effort to keep the helicopter air facility in Newport.

Letters of Support from Oregon's Congressional Delegation to the Coast Guard:

<http://www.portofnewport.com/user-files//coast%20guard%20letter.pdf>

<http://www.portofnewport.com/user-files//14.10.22%20SL%20OR%20Delegation%20to%20Admiral%20Zukunft%20Newport%20Air%20Facility.pdf>

Letters of support from following individuals and organizations:

Port of Alsea, Oregon Ocean Policy Advisory Council, Governor John Kitzhaber, Surfrider Foundation, Midwater Trawlers Cooperative, Newport Fishermen's Wives, Michele Longo Eder, Ginny Goblirsch, Gahlsdorf Logging, Associated Oregon Loggers, Depoe Bay Fire Department, Sara Skamser, Newport Fire Department, Seal Rock Fire Department, Tillamook County Fire Defense Board representing Nehalem Bay Fire & Rescue, Rockaway Beach Fire Department, Garibaldi Fire Dept., Bay City Fire Dept., Tillamook Fire District, Netarts-Oceanside Fire District, Nestucca Fire Dist., No. Lincoln County Fire District.

<http://www.portofnewport.com/user-files//supportletters40.pdf>

Resolution , Letters from City of Newport, Waldport, Depoe Bay, Lincoln City

<http://www.portofnewport.com/user-files//City%20of%20Newport%20Resolution%20Number%203692.pdf>

http://www.portofnewport.com/user-files//DOC001_00003.pdf

<http://www.portofnewport.com/user-files//USCG%20Air%20Support%20Ltr%20Depoe%20Bay.pdf>

http://www.portofnewport.com/user-files//DOC000_00002.pdf

Resolutions from Lincoln County , Tillamook County, Coos County

<http://www.portofnewport.com/user-files//CountyRes.pdf>

http://www.portofnewport.com/user-files//DOC001_00002.pdf

http://www.portofnewport.com/user-files//DOC001_00002.pdf

Petition signed by over 16,000 people to keep helicopter in Newport

http://petitions.moveon.org/sign/save-the-newport-rescue?source=s.fwd&r_by=4037606

Letter in support from Yaquina Bay Economic Foundation

<http://www.portofnewport.com/user-files//YBEF-Coast%20Guard.pdf>

Letter of Support, Newport Fishermen's Wives

<http://www.portofnewport.com/user-files//10.23.14%20Newport%20Fishermen's%20Wives%20Letter%20to%20Adm.%20Zukunft.pdf>

Letter of Support, Dockside Charters

<http://www.portofnewport.com/user-files//20141103111236.pdf>

Letter of Support OSU Hatfield Marine Science Center, Director Dr. Bob Cowen

<http://www.portofnewport.com/user-files//Letter%20to%20Coast%20Guard%20re%20Helicopter%20Support.pdf>

Letter of Support Dr. Shelby Walker Director, Oregon Sea Grant

http://www.portofnewport.com/user-files//USCG_Newport_helicopter_OSG_102814.pdf

Letter of Support Dr Belinda Batten-NMMREC

http://www.portofnewport.com/user-files//USCG_letter_BAtten.pdf

Letter of Support Confederated Tribes of the Siletz

http://www.portofnewport.com/user-files//DOC000_00006.pdf

Letter of Support from Ginny Goblirsch

<http://www.portofnewport.com/save-our-air-station.php>

Additional letters of support, written petitions, video of town hall meetings and other public comments in support of retaining the helicopter are located

at <http://www.portofnewport.com/save-our-air-station.php> and by this reference, incorporated into this public comment.

Submitted on behalf of Newport Fishermen's Wives

Jennifer Stevenson, President

Ginny Goblirsch

Heather Mann

Michele Longo Eder

Newport Fishermen's Wives

P.O. Box 971

Newport, OR 97365

#savethehelo



ARCTIC STORM MANAGEMENT GROUP, LLC

2727 Alaskan Way, Pier 69
Seattle, Washington 98121 U.S.A.

Dorothy Lowman
Chair, Pacific Fishery Management Council
7700 NE Ambassador Pl., Suite 101
Portland, OR 97220

November 4, 2014

Dear Ms. Lowman,


On behalf of the 119 employees working aboard the Arctic Storm mothership and the fleet of vessels delivering whiting to our processing platform, Arctic Storm Management Group would like to express its deep appreciation to the Pacific Fisheries Management Council and the National Marine Fisheries Service (NMFS) for taking action last month to extend the Mothership (MS) whiting fishery with an inseason reallocation of darkblotched rockfish.

Timing was crucial when simultaneous lightning strikes of bycatch abruptly closed down the MS whiting fishery with more than a third of the sector's whiting allocation, valued at about \$10 million, still in the water. That the agency and Council responded so quickly to take action that would allow achievement of OY without negatively impacting darkblotched rockfish, Chinook salmon or other fishery participants, is a tribute to the level of commitment and flexibility inherent in the regional management process.

The successful rockfish rebuilding programs coupled with the high abundance of whiting have made it increasingly difficult to harvest whiting. When the fleet moves from one area to avoid bycatch of one species, it inevitably encounters bycatch of another species. This year has been extraordinarily tough with the abundance of whiting so high and the rockfish caps fixed at very low levels even though the successful rebuilding programs are increasing those populations and making avoidance so much more difficult. Under these circumstances, the MS sector has limited tools available in avoiding encounters with the hard cap allocations of rockfish. Unlike the shoreside sector, the MS sector does not have access to other sources of rockfish bycatch available in the IFQ program. Nor do the smaller, less powerful catcher vessels have access to the deeper waters fished by the catcher processors when avoiding rockfish.

When the darkblotched rockfish cap was triggered and our fishery suddenly shut down, the MS sector requested 3 mt of darkblotched rockfish be reallocated so that the fishery could remain open. Only 58 mt of the 330 mt annual West Coast allocation of darkblotched rockfish had been used. Clearly, the proposed reallocation would have neither a negative conservation impact on the stock or on other users. However, there were some procedural hurdles to overcome as well as concerns about Chinook bycatch. It took a concerted effort by everyone to address all these issues in a transparent process. In the end, that effort had a very powerful and positive impact on MS fishery participants who faced losing some or all of their whiting income.

Thank you again for the extraordinary effort by Council members, staff, and NMFS regional leadership in making this happen.

Sincerely,


Donna Parker
Director of Government Affairs

May 20, 2014

PFMC Meeting June 2014 Agenda Item B.1

Pacific Fishery Management Council
7700 NE Ambassador Pl., Suite 101
Portland, Oregon 97220-1384

Madame Chair and Council,

This is a letter requesting an amendment to Table 2 in the Federal Registry. Specifically, to amend the trip limits for Near Shore and Deeper Near Shore species to allow more than one State issued Near Shore or Deeper Near Shore permit holder to make landings on the same vessel. I propose NMFS add to Table 2 a section that states that vessels with more than one State issued Near Shore Permit aboard may retain twice the limit set by NMFS.

I want to clarify that in California the Near Shore and Deeper Near Shore species are retained only through State issued permits that are issued to individual licensees and that trip landings are allocated to these individual permit numbers, not to the fishing vessels. This is different from the Federal Limited Entry permits, which are registered to the fishing vessel with the associated vessel based cumulative trip limits. Federal LE permits do not allow retention of the Near Shore and Deeper Near shore species of rockfish in California but because these species are managed by the NMFS they are subject to the vessel based cumulative trip limits detailed in Table 2. Because Table 2 refers only to vessels, it doesn't account for licenses that issued to individuals. Fishermen who share a vessel but possess individual and separate Near Shore or Deeper Near shore permits are left without the ability to retain their individual trip limits. This is the issue that we are seeking to address with an amendment to Table 2.

My brother and I, along with many other partnered fishermen in California, are being greatly affected by this aspect of Table 2. We are partners in our fishing business and co-owners of our vessel, and we both possess State issued Near Shore permits. Currently we cannot land our individual Sebaste quotas on our boat because of the vessel based cumulative trip limit specification in Table 2. The only way for each of us to retain our Sebaste quota would be to buy another vessel. A new vessel along with the slip fees, VMS, and added maintenance and fuel costs is not financially feasible or ecologically responsible. The Sebaste allotment is only 600 to 1,000 pounds of fish over a two-month period; this is not worth the costs of obtaining another vessel but does impact our ability to make a living as commercial fishermen in the Near Shore and Deeper Near Shore fishery. We have invested in these permits and should be able to fully utilize them as they are intended.

I respectfully propose that NMFS add a section to Table 2 that states that vessels with more than one State issued Near Shore or Deeper Near Shore permit holder aboard may retain twice the limit set by NMFS and listed in Table 2.

Thank you,
Jason Robinson

Mr. Brad Pettinger, Oregon Trawl Commission provided the following three videos, one which features an Oregon groundfish vessel featured in a national ad by Whole Foods Market.

The link to those videos:

<http://www.wholefoodsmarket.com/values-matter/tv-commercial-seafood>

<http://filemailer.beam.tv/rwfcZwbxVr/yQztmNGrSm#/f>



Agenda Item B.1.c
Supplemental Public Comment 12
(Electronic Only)
November 2014

IUU Executive Brief

08.25.14

Frequent^z

Frequentz Overview

Frequentz is a technology leader in providing comprehensive serialized data, complete supply chain traceability, and information management solutions.

Our solutions provide valuable insight into end-to-end supply chains and critical business processes by collecting, storing and analyzing serialized, life history data.

Based in the heart of Palo Alto, CA, we are a capital-backed corporation with funds from a leading Silicon Valley investment firm, credited with the launches of some of the world's best-known tech companies.

We offer:

- Internal and external traceability expertise available
- Enterprise platforms
- An ERP agnostic solution
- Visibility into the chain of custody
- The most powerful EPCIS certified repository
- Unique, unit-level or lot-level identification
- Traceability + Transparency = Consumer Trust

Mission: Bringing innovative, leading technology to as many people as possible to ensure customer safety and protect brand integrity.

Business Alliances



GS1 Alliance



European Medical Tracing Standards



European Tracing Committee



Lab Testing for 5,000+ Food Companies



European Mobile Food Tracing Application



Largest OEM Automotive Part Data & Commerce SaaS



Global OEM Partnership

IRIS Product Overview

How IRIS Was Built

- Built with a standards-based approach defined by GS1
- Events are stored in IRIS and can be securely shared with anyone in a business network to show visibility and movement of an EPC

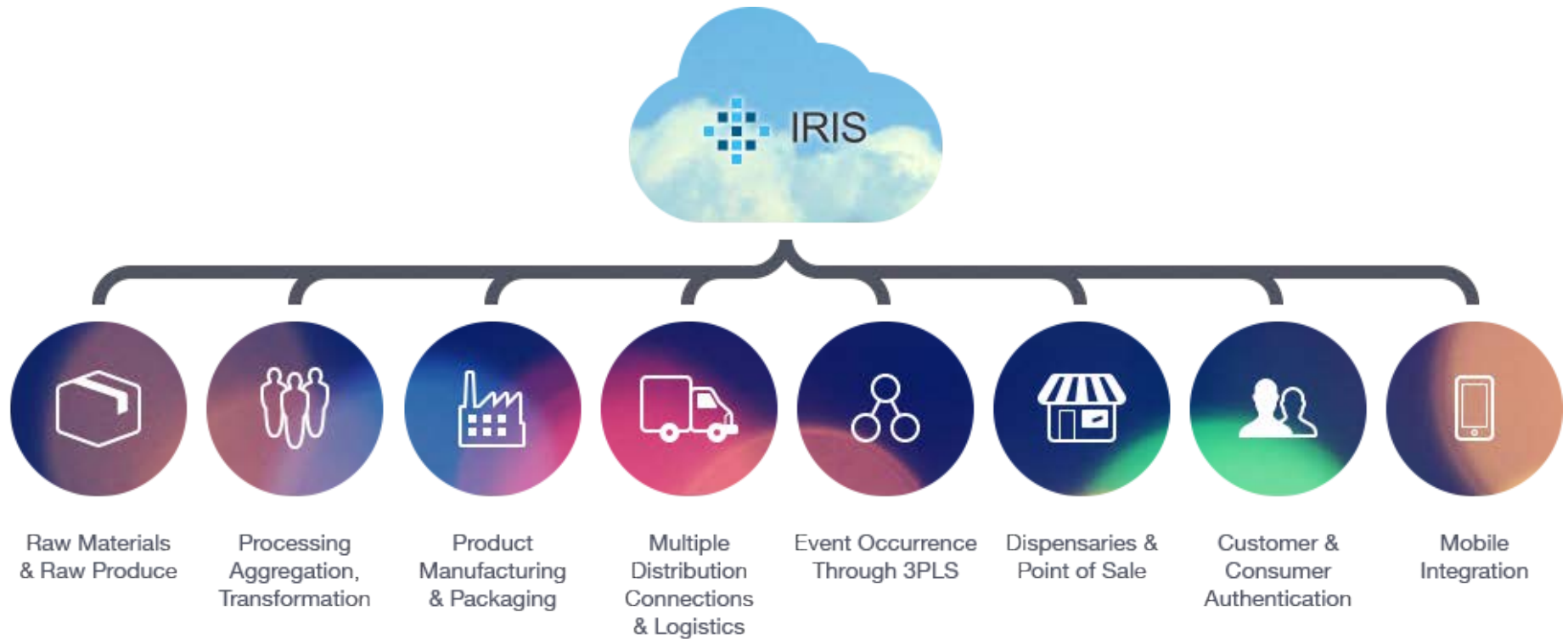
How IRIS Works

- A repository database that stores event data
- Captures event data to populate the repository and allows for that data to be queried
- Event Data: EPCIS – Electronic Product Code Information Service (Defined by GS1)
- EPCIS: 4 Attributes (in each event) – what, when, where and who
 - What: Unique ID serial number – from a company's ERP software
 - When: Date and Time
 - Where: GLN – Global Location Number
 - Who: The business operation that the item is passed through

How Mobile Connects to IRIS

- Mobile devices capture event data and push that information into IRIS through an API, XML, or Message Query – mobile devices can access, verify, and be sent data via the same methods

IRIS Platform Overview



Our Key Customers

Life Sciences

Baxter

McKesson
Empowering Healthcare


Cardinal Health

TEVA
TEVA PHARMACEUTICALS USA


GSMS
incorporated

Smith
DRUG COMPANY


EMD SERONO

Food

METRO GROUP


Earthbound Farm
ORGANIC

 **ConAgra Foods**
Food you love *Pilot


AgroAmerica

 **CHIC Foods**

MARBELIZE S.A.

Industrial


Ford


HONDA


DU PONT

CPG


AgroAmerica

Frequentz's Sustainable Ocean Team

Frankie Terzoli

- 30 years in the seafood business
- 3000 ton USGC licensed Captain
- Award winning Chef and television personality on the Food Network and Bravo TV
- Served as Director of purchasing for Santa Monica seafood
- ISO 22000, HACCP, FSSE, Lead Auditor certified

David Awamleh

- B.A. from Stanford in Business
- 27 years of seafood supply and wholesale experience
- Former Vice President of Del Mar Seafood and Qualy-Pak Seafood
- Relationships with over 100 seafood companies globally
- Strong presence in China, Japan and Australia

John McPherson

- B.S. of Biology from Boston College
- 10 years experience in education of ocean resource management
- Founding Board Member of the Los Angeles Sustainability Collaborative



Rationale

- Managed Fisheries create sustainable fisheries for fishermen and consumers:
 - US Fisheries Management has overseen stock recoveries and increased value to fishermen
 - Ex. Pacific halibut ex-vessel price rose 200% when the fishery moved from derby fishing to Individual Boat Quotas
- Management depends on timely, accurate data collection for ALL seafood entering the market:
 - IMO Vessels have tracking requirements, and US Fisheries employ Observers to verify catch totals.
 - Observer coverage is not 100% in all US Fisheries
 - No current way to monitor and record the catch from smaller vessels. 60% of the data are never captured (where they fished, what they caught, what their by-catch was).
- Consumers and restaurants have created a demand for sustainable seafood. Retailers are responding by requiring product lineage from suppliers (METRO Group, e.g.).
- Meeting consumer demands requires full-chain traceability



How It Works

- Using GS1 standards (not based at source) stored within IRIS, we allow for supply chain transparency in the seafood world.
- myIRIS (the mobile application) will allow data from all vessels (small and large) to record their catch and then start the chain of custody from the capture point. This data will be stored and could be shared with NGOs, government agencies and will be the starting point for supply chain transparency.
- myIRIS validates catch by fishing method, location of catch, species, and species indigenous to the location.
- Mandates in the EU and a new executive order are driving sustainability as a result of consumer outcry.
- Our traceability solution can alert in the case of seafood fraud or recalls due to quality or contamination.
- Our system is non-exclusive (works with any accounting or operating system) and is agnostic (protect consumer privacy).
- Allows traceability costs to be share by all supply chain participants.



Value Proposition

Today	After Deployment of IRIS
Fishermen pay for vessel cargo insurance based upon yearly catch projections	Policies will be automatically generated based upon real-time catch reporting through IRIS
Fishermen and government agencies manually fill out forms	Web services will automate forms, thus saving time and money
Fishermen are at the mercy of processors who, at times, short pay them. This can occur up to 90 days after they have unloaded their catch	Catch weight verification will be standardized within 24 hours in order for payment processing to proceed
Academia relies on outdated information purchased from multiple sources; resulting in less than accurate data in assessments and studies	Accurate, current, and real-time data can be made available, while keeping vessel records confidential
'Dolphin-Safe' certification is void on the entire cargo when a mortality has been reported	'Dolphin-Safe' certificates issued per set, not per trip
All species are treated equally regardless of when fished in pristine waters or by responsible methods	Catch certificates will show location (Hawaii vs. Indonesia) and method of catch. This will add value to responsibly caught fish.
Data is fragmented, not collective -- even by different branches of the same entity (NOAA)	Repository for data gathered for use by multiple agencies (gov't, non-profit, etc.) and can be queried at-will

Those Who Stand Behind Us

We have strategically formed relationships with organizations to build our brand awareness and technology as the leader within the industry.



Tangible Benefits Combating IUU Fishing with Frequentz

Partnership:

- Establish U.S. coverage for vessel catch data capture
- Provide a single platform where all incoming data can be analyzed
- Enables data to confidently be validated for consumers
- Use myIRIS infrastructure to connect with other Government agencies
- Allow academia limited access keeping vessel data confidential, to better access global resources

Mobile app provides NOAA:

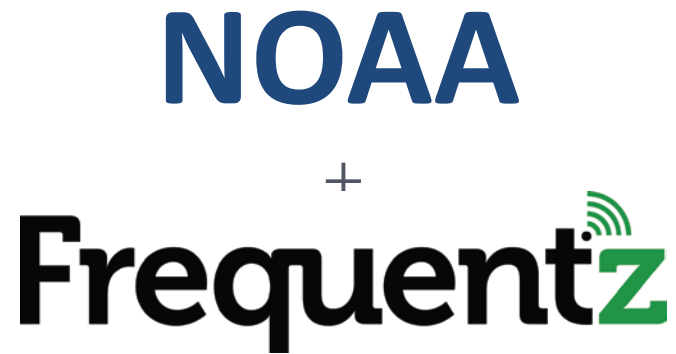
- Allows data capture at point of catch where observers are not present
- Electronic lot trace to minimize fraud to consumers
- Incentives fisherman to use data capture by proven historical price increase
- Fisherman are able to directly participate in the Oceans future

Additional Benefits:

- Shared Global data
- Global solution for a even fisheries playing field
- Compliance with new EU standards

Secure, scalable and sustainable





Creating a More
Sustainable Earth

Thank you.

