



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

April 11, 2015

Dear Chair Lowman & Council Members

Please accept these comments on behalf of the Midwater Trawlers Cooperative (MTC). MTC represents 22 mid-water trawl catcher vessels that participate in the at-sea and shoreside whiting sectors as well as the bottom trawl groundfish fishery off the west coast. MTC members are directly affected by the widow rockfish reallocation decision currently being considered by the Council.

First, MTC members would like to thank the Council for fast-tracking the widow reallocation package. We have long advocated that this issue should be prioritized as we have heard it is something that can be beneficial to the current fleet and we appreciate the effort that Council staff has put into developing the analysis over a relatively short period of time.

However, MTC believes that it is premature to take final action on reallocation at this meeting. We believe that more time to understand impacts to stakeholders will benefit the process. This is an important topic that affects a number of current fishery participants. It has become apparent throughout this week that not all stakeholders understand clearly how the different options impact them and the process would be better served by providing additional time for consideration of the alternatives. It is critically important to get the reallocation right, as this is the process and model that will be utilized as additional fish species rebuild and transfer from the overfished list back into the fishery. Some believe that there is no need to build a solid record for this allocation because the intent was stated as a desire to reestablish historical fishing opportunities for widow rockfish. With my long experience with the Pacific Dawn remand and subsequent litigation I would argue that a solid record that incorporates MSA allocation considerations is necessary and I'm not sure we have all the information to create that record.

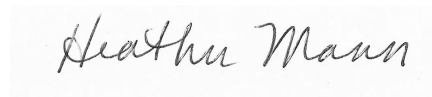
If the Council believes they have enough information on the allocation impacts to take final action at this meeting then MTC supports Alternative 2a. As far as I can tell from the available analysis, 2a most closely approximates the way species were distributed during the original allocations of Amendment 20 and seems to be the most fair and equitable between the whiting and non-whiting fleets.

Proponents for alternative 2b suggest there really is no difference between 2a and 2b except that 2b uses a more appropriate ABC/ACL to determine allocations and that 2a uses an artificially low level to determine allocations so is not appropriate. Based on the analysis presented in the draft EA this is not the only difference between the options. 2b directly disadvantages the whiting fleet in terms of providing a smaller allocation to whiting vessels (5.7% compared with 12.3% in 2a). We know then that the bycatch needs most likely will not be met during some future season with growing populations of widow rockfish and large whiting TACs. Further, the logic for 2b seems contradictory. On the one hand the proponents of 2b want to heavily weight historical non-whiting widow landings while they simultaneously discount recent participation. At the same time those same 2b proponents want to allocate fish based on some future higher ACL limit.

In conclusion, MTC believes more time is needed to understand the alternatives and make an allocation that avoids unintended consequences. We need to get this right and we need a solid record. If the Council believes they have enough information to take final action at this meeting then MTC endorses Alternative 2a, which appears in the analysis to most fairly allocate widow rockfish between the whiting and non-whiting participants.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Heather Mann". The signature is written in a cursive, flowing style. The first name "Heather" is written in a larger, more prominent script, and the last name "Mann" follows in a similar but slightly smaller script. The signature is centered horizontally within the block.

Heather Mann