

Agenda Item G.9.b
Supplemental Public Comment
June 2016

From: Rod Moore [mailto:rod.wcseafood@gmail.com]
Sent: Monday, June 13, 2016 4:30 PM
To: 'Dorothy Lowman'; Chuck Tracy; Frank Lockhart (Frank.Lockhart@noaa.gov)
Subject: Supplemental Public Comment on Agenda Item G.9

I am writing specifically regarding the language in Table 4-11 in G.9, Attachment 2, Preliminary Draft EIS. Under the column titled "Soioeconomic Impacts" for alternative G-2, the impact on processors is listed as "neutral". This is directly contradicted by the text found on page 12 which states: "While Alternative G2 would likely be a cost savings measure for harvesters, it would likely have a low negative impact on first receivers in the form of an increased paperwork burden, as they would have to fill out additional fish tickets for trips that took place in multiple management areas." [emphasis added].

The text then goes on to conclude that the impact is really neutral because "Alternative G2 would not change the areas open for fishing, or the gear configurations allowed for removal."

I note that the explanation given to why the impact would be neutral, as opposed to low negative, is due to factors that affect harvesters, not processors.

Please note that we have no problems with either this alternative or alternative G3 (GAP alternative); indeed, either one would help make fisheries more flexible and increase access to fish, which we strongly support. However, the Council and NMFS should at least get the language right in the draft EIS and stop trying to pretend that every aspect of the TIQ program is good for processors. Simply admit this has a low negative impact, will impose an increased paperwork burden, but that over all the change is good for the fishery.

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