

Owen Hackleman

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2nd May 2017

Dear Chairman Pollard and Council Members,

Part of the 5 year review for the trawl IFQ program includes consideration of altering the 36 degree line for apportionment of fixed gear sablefish. Any changes or removal of the 36 degree line for management of the fixed gear portion of the fishery would result in huge quota cuts for the fishermen of Morro Bay and southern California, most of whom use longline permits without a sablefish endorsement or fish open access. Any changes would undoubtedly put dozens of small fishing operations out of business. Fixed gear Sablefish south of 36 degrees have been fished by southern California fishermen, apart from the northern tier fishery, for many years. Local businesses have invested and based their businesses on these higher limits and depend on the fish here . Please consider the huge negative impacts to the fleet that fishes sablefish south of 36 degrees. Please do not move or alter the 36 degree line for fixed gear sablefish.

Sincerely,

Owen Hackleman

F/V Provision

GF permit #633

From: **William Diller** <wdiller911@gmail.com>

Date: Tue, May 9, 2017 at 5:39 PM

Subject: 5 year Catch Shares Review.

To: pmmc.comments@noaa.gov

Council members: In the section, " Allocation of Sablefish North of 36 N Latitude", mention has been made of the option to remove the 36 degree N. line. I'll cut to the chase, removal of this line would be devastating to the fishers and buyers who have capitalized on one of the only fisheries left in the south of 36 area. If this option became necessary, it would be somewhat mitigating if the holders of Limited Entry Fixed Gear permits that do not have Sablefish endorsements were to be granted Sablefish tier endorsements based on their landings of Sablefish over the last ten years. This would be something of a "saving" action but it would still be not nearly as good as leaving the fishery, here, alone. We have developed domestic markets for the Sablefish and Thornyheads that are dependent on a continuous supply in manageable amounts from the fleet of local boats. Please do not tamper with the Fixed Gear, south of 36 N, fishery. It functions well now and many people are absolutely dependent on it's continuation, status quo. Thanks You, William Diller GF0632

5/10/17

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

RE: 5-year review of the Pacific groundfish catch share program

Dear Chair Pollard,

EDF would like to commend the Council for conducting a thoughtful 5-year review of the Pacific groundfish catch share program. As you know, we have been heavily engaged in its design and implementation and we appreciate the opportunity to comment and provide our perspective at this important milestone. We also look forward to providing more detailed comments during the June meeting after analyses from Council and NOAA staff are available.

It has been broadly recognized that the catch share program has achieved significant conservation gains including fewer discards, reduced catch of overfished species, and accelerated rebuilding times. These benefits have helped the fishery achieve Marine Stewardship Council (MSC) certification and have begun to help open new sustainability conscious markets. However, the durability of these conservation gains is linked to the long-term economic viability of the fishery and the economic performance of the catch share still needs to improve. While market limitations play a role, creating a management regime that provides the fishery the ability to cost-effectively provide product year-round, is a first step towards allowing it to compete with Canadian-caught groundfish and other imported whitefish.

EDF and our partners have been engaged in efforts to help improve economic performance in a number of ways, including by advancing the recent yellowtail/widow EFP, removing outdated gear restrictions, reconfiguring RCA and EFH areas, and through the development of a cost-effective EM program. We appreciate the Council's engagement and commitment across these efforts. The 5-year review is an opportunity to identify additional actions that are targeted to help meet the economic objectives identified in Amendment 19. We look forward to discussing the analyses with the Council with an eye towards identifying real and practical solutions.

We anticipate that an overarching theme to those solutions could be the simplification of the program. A market-based system tends to work best when regulations are simple. While there is some inherent complexity in the fishery given the number of species, we believe there is opportunity to streamline.

Thank you for the opportunity to provide initial comment and we look forward to working with the Council to identify ways to help the program reach its full potential.

Sincerely,



Shems Jud
Pacific Regional Director