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Agenda Item F.2.b  
Supplemental Public Comment 3  
November 2017

November 5, 2017

Mr. Phil Anderson, Chairman  
Pacific Fishery Management Council  
770 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

RE: Agenda Item F.2 Groundfish Trawl Catch Share Program Five-Year Review

Dear Chairman Anderson and Council members,

Please accept these comments from the Monterey Bay Fisheries Trust ("Trust"), a 501(c)(3) nonprofit, dedicated to preserving and enhancing the groundfish fishery in the Monterey Bay region of California. The Trust is a quota share owner that offers prioritized and affordable leasing of quota pounds to local fishermen, with second priority leasing to fishermen in other California ports.

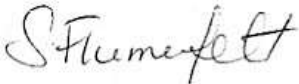
The Trust appreciates the work completed thus far by the Council's ad hoc Community Advisory Board (CAB). As the Council considers developing or narrowing alternatives for the gear switching and 36-degree management line issues, the Trust hopes that it will recognize that the groundfish fishery in California is markedly different than that in Oregon and Washington. The Trust appreciates that gear switching is one of the contributing factors to the competition for sablefish quota shares and pounds, which in turn limits the performance of trawl fishing. However, California, and particularly Central California, presently has weak markets for large volumes of trawl groundfish, such as Dover sole. We are working on developing new markets, given that Dover sole and other flatfishes are healthy and abundant, but more selective fishing with hooks, traps and pots is needed to sustain the local fishing economy. Without the ability of vessels, in particular primary trawl vessels, to gear switch at times, sablefish will go unharvested.

Further, any across the board elimination of the 36-degree management line will likely cause an increase in leasing costs for all vessels who have utilized southern sablefish quota pounds. This would be good for the quota owners, but bad for the quota leasers, raising their cost of doing business and upsetting business models.

With these factors in mind, the Trust requests that the Council direct further economic and performance analysis on the effects of various rule change alternatives on California fishermen and fishing communities. The Trust is working hard to restore the groundfish fishery to our region, including the eventual development of larger high volume markets. We hope that the Council can appreciate our interest in ensuring that rule changes to the rationalized trawl fishery do not compromise California's ability to participate in this fishery.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "S. Flumerfelt". The signature is written in dark ink and is positioned below the word "Sincerely,".

Sherry Flumerfelt  
Executive Director  
Monterey Bay Fisheries Trust