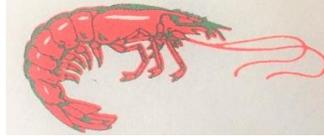


CALIFORNIA SHELLFISH CO., INC.  
505 BEACH STREET SUITE 200  
SAN FRANCISCO, CA 94133

Agenda Item H.2.b  
Supplemental Public Comment 1  
April 2018



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

RE: Agenda Item H.2: Membership Appointments and Council Operating Procedures -  
Creation of an Ad Hoc Committee on Issues Related to Trawl Allocation and Southern  
Sablefish Attainment

Dear Chair Anderson and Council Members:

I recommend the appointment of Mike Okoniewski to the advisory panel to the Ad Hoc Committee on Issues Related to Trawl Allocation and Southern Sablefish Attainment. Mike has played an active role in the PFMC process for many years.

Mike has worked in all facets of the seafood processing industry for several decades. His participation in development of the Amendment 20 catch share program and subsequent in depth study of the final plan provide Mike with a unique skill set when it comes to analyzing strengths and weaknesses of the program. His participation on the CAB makes Mike particularly familiar with all sides of the sablefish ACL attainment issue.

Mike has a solid knowledge specific to trawl and gear switching sablefish fisheries and both the domestic and Japanese sablefish markets. He understands the economic intricacies of, and relative value both the trawl and fixed gear fisheries have to, the overall success of the catch share program. Mike's grasp of the details of this issue make his appointment to the advisory panel necessary to a successful, workable solution.

Tom Libby

A handwritten signature in black ink, appearing to read 'Tom Libby'. The signature is stylized and cursive, with a prominent initial 'T' and a long, sweeping underline.

March 29, 2018



Agenda Item H.2.b  
Supplemental Public Comment  
April 2018

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

**RE: Agenda Item H.2: Membership Appointments and Council Operating Procedures -  
Creation of an Ad Hoc Committee on Issues Related to Trawl Allocation and Southern  
Sablefish Attainment**

Dear Chair Anderson and Council Members:

The issues of gear switching and the allocation and attainment of the Southern sablefish harvest are both of vital importance to Pacific Seafood's west coast operations. These include five operations in three states. Three of these operations are dependent on groundfish to attract year around work for our processing team members. Each of these operations provide essential infrastructure for our fishing fleets and are an important employment base for many local residents.

As we understand, there will be 6 non-voting Constituent Advisors that work with the new Ad Hoc Trawl Allocation and Southern Sablefish Attainment Committee (TASSAC). We strongly urge you to select Mr. Mike Okoniewski to be one of the advisors. Mr. Okoniewski is a CAB member, has substituted on the GAP many times, and has been co-chair of the CPSAS for 12 years. He is on MAFAC and serves as their liaison on the Columbia River Basin Task Force.

Mr. Okoniewski has worked extensively with many stakeholders that operate under the Amendment 20 catch share program. He attended six of the west coast NOAA Fisheries/fishing community meetings. He has managed two of our west coast groundfish plants in Charleston and Warrenton, OR. His duties included trawl, crab, shrimp, and fixed gear fleet coordination as well as sales and logistical coordination. In the past he has sold both fixed gear and trawl caught sablefish to Japanese export customers.

Mr. Okoniewski knows the trawl fisheries and markets well. He also understands the sablefish markets with many past trips to Japan. Both the trawl and fixed gear fisheries are important to Pacific Seafood. He is open minded and will listen to the facts and weigh potential outcomes carefully before formulating a final opinion. As one of the largest buyers of both fixed gear and trawl products on the west coast, Pacific Seafood does not believe you could select a better candidate as an advisor on this important issue than Mr. Okoniewski.

March 29, 2018



Agenda Item H.2.b  
Supplemental  
Public Comment  
April 2018

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Gonzalez".

Jonathan Gonzalez  
*Fisheries Policy Analyst*  
Pacific Seafood Group  
c: 805-455-7220  
[jgonzalez@pacseafood.com](mailto:jgonzalez@pacseafood.com)



**West Coast Seafood Processors Association**  
650 NE Holladay Street, Suite 1600  
Portland, OR 97232  
(503) 227-5076

March 30, 2018

Mr. Phil Anderson, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

RE: *Agenda Item H.2, Membership Appointments: Trawl Allocation and Southern Sablefish Allocation Committee*

Dear Mr. Anderson,

The West Coast Seafood Processors Association (WCSPA) strongly supports **Mr. Mike Okoniewski** from Pacific Seafood Group for one of the six advisory positions on the ad hoc Trawl Allocation and Southern Sablefish Allocation Committee (TASSAC). WCSPA represents shore-based seafood processors in California, Oregon, and Washington. Our member companies process all species under the Pacific Fishery Management Council's purview, including the majority of non-whiting groundfish landed shoreside. Pacific Seafood Group is one of six major shoreside processing member companies in WCSPA. We believe Mike will do an excellent job representing our members' interests regarding this issue and working with everyone on the TASSAC towards effective solutions.

Mr. Okoniewski is co-chair of the Coastal Pelagics Species Advisory Subpanel (CPSAS), has served on the Community Advisory Board (CAB) for the five-year groundfish trawl rationalization program review, and has served as an interim member on the Groundfish Advisory Panel (GAP). He has been fully engaged on each of these advisory bodies and works to consider all sides of any management issue. Mr. Okoniewski understands the sablefish issue from a buyer/processor's perspective – whether sablefish is sold solely or in combination with an entire groundfish complex – and what that means for end markets, both wholesale and retail. He also works closely with groundfish vessels and realizes the importance of sablefish to all West Coast fishermen. Mr. Okoniewski is one of the few people fully aware of how the West Coast's sablefish and groundfish fishery relates to Alaskan fisheries and global markets. This is critical to understanding the ramifications of changes made to the groundfish fishery, and how these changes would affect fishermen and markets.

Thank you for considering Mr. Okoniewski as one of the advisors for the TASSAC.

Sincerely,

A handwritten signature in black ink that reads "Lori L. Steele". The signature is written in a cursive, flowing style.

Lori Steele  
Executive Director



**West Coast Seafood Processors Association**  
650 NE Holladay Street, Suite 1600  
Portland, OR 97232  
(503) 227-5076

March 30, 2018

Mr. Phil Anderson, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

RE: *Agenda Item H.2, Membership Appointments: Trawl Allocation and Southern Sablefish Allocation Committee*

Dear Mr. Anderson,

The West Coast Seafood Processors Association (WCSPA) strongly supports Mr. Andrew Bornstein for one of the six advisory positions on the ad hoc Trawl Allocation and Southern Sablefish Allocation Committee (TASSAC). WCSPA represents shore-based seafood processors in California, Oregon, and Washington. Our member companies process all species under the Pacific Fishery Management Council's purview, including the majority of non-whiting groundfish landed shoreside. Bornstein Seafoods is one of six major shoreside processing member companies in WCSPA. We believe Andrew Bornstein will do an outstanding job representing our members' interests regarding this issue while working with other stakeholders in a collaborative and problem-solving manner.

Mr. Bornstein has spent most of his professional career in the groundfish industry on the West Coast. He's worked closely with both fixed gear and trawl fishermen, buying sablefish for domestic and foreign markets. Bornstein Seafoods buys from a diverse group of fishermen to deliver groundfish to equally diverse markets – it's a fine balancing act. He also has been actively involved in fisheries management (groundfish and sablefish in particular) and the Council process. He served on the Groundfish Allocation Committee (GAC) during development of the trawl catch shares program and also on the Community Advisory Board (CAB) during the program's five-year review. His perspective during both the development of the trawl rationalization program and the review will give him unique insight to the problems associated with sablefish management. It is this kind of background that makes Mr. Bornstein a prime candidate as an advisor for the ad hoc TASSAC.

Thank you for considering Mr. Bornstein as one of the advisors for the TASSAC.

Sincerely,

A handwritten signature in cursive script that reads "Lori L. Steele". The signature is written in black ink on a white background.

Lori Steele  
Executive Director

Chairman Phil Anderson  
Pacific Fishery Management Council

Sent by email  
March 30, 2018

**Re: Agenda items H.2 and H.3**

Chairman Anderson and Council members:

The coalition of fixed-gear harvesters and processor represented by the senders of this comment letter are respectfully providing the Pacific Fishery Management Council with suggestions and requests regarding the proposed Ad Hoc Trawl Allocation and Southern Sablefish Attainment Committee (TASSAC). First, we are pleased that the Council has chosen to name an ad hoc committee to resolve the issues surrounding attainment of trawl allocations, and look forward to participating in the TASSAC process as it moves forward.

**Committee charge and guiding principles**

We are also pleased that the proposed charges to the committee, described in Attachment 1 to Agenda Item H.2, include “a desire to look at these issues in the context of the overall goals of resource access and utilization.” We agree with the Council that it is necessary “to carefully consider the cause(s) of the allocation attainment problems, and how solutions proposed to date, or new solutions, might address these problems.”

Further, we applaud the Council’s expressed interest, described in Attachment 1, in having “a committee put creative thought into identifying new solutions that may not involve a limitation on gear switching.” For example, we would point to the Supplemental GMT Report 1 in H.2a of the March 2018 meeting, that identifies certain factors, such as a new sablefish assessment in 2019, and trawl gear regulatory reforms, which may address competing needs of the different sectors, without new regulations.

As noted in Attachment 1, the Council discussion also included an interest in maintaining each trawler’s opportunity for some harvest with fixed gear, even if they have not previously taken advantage of gear switching provisions.

We suggest that the proposed charge to TASSAC on Page 3 of Attachment 1 *explicitly* include exploration of these elements identified in Council discussion in March 2018, in addition to the currently listed discussion of modifying gear switching regulations and encouraging increased utilization of sablefish south of 36 degrees.

On Page 2 of Attachment 1, the document suggests the three principles coming from the CAB in November 2017 could be used as guiding principles for the committee’s

development of alternatives. Our coalition, which includes two members of the CAB, and other fishermen who actively participated at the meetings, would like to emphasize that the interpretation of the principles is important to clarify.

1. "We want to get more sablefish to the trawl fleet."

This goal was considered important, but fixed gear CAB participants understood that its attainment was not intended to come at the expense of fixed gear operators. Discussion of this goal also had to do with potentially making more sablefish available from the south.

2. "We want to consider existing operations/investments."

For fixed gear CAB participants, this meant not taking away from those who have invested and participated in harvesting sablefish with fixed gear, either through purchasing trawl quota or establishing leasing relationships.

3. "We believe that unlimited catch of sablefish through gear switching is not desirable."

For fixed gear CAB participants, this did not mean that a percentage limiting fixed gear catch should be imposed, because of the danger of creating a race for fish.

### **Committee composition**

As you choose the six industry advisors to the Council committee, the fixed gear coalition respectfully asks that you consider two requests:

1. Please name an equal number of industry advisors from each of the two advocacy groups. We provide a list below of recommended members of the fixed gear user group who are ready to serve as advisors.

2. If you are naming a trawl-focused processor representative as an advisor, please also name a fixed gear focused processor representative. As trawl-caught groundfish processors are playing a large role in this Council action, it makes sense to also have information about the global marketplace from the perspective of a processor specializing in groundfish harvested with fixed gear.

The volunteers we support for the advisory panel are:

Bob Alverson

Besecker Company (Besecker Company is the largest processor of fixed gear sablefish on the West Coast.)

Bill Blue (Bill is the only resident fixed gear fisherman below the 36 line who is involved in the trawl IFQ program.)

John Corbin

Michele Longo Eder

Georgon "Poggy" Lapham

### **Committee timing**

We are in agreement with the broad outline of the committee and Council timing proposed in Attachment 4 under Agenda Item H.3. We assume that the TASSAC report to the Council listed for November 2018 will include preliminary alternatives developed by the committee over the summer and early fall.

Again, we look forward to helping the Council address attainment of trawl sector allocation of West Coast groundfish fisheries. However, we do not support trawl gear only access to sablefish, and believe that market forces play a role in dictating which gear type is best used for harvest.

Thank you for your consideration of our comments and requests.

Regards,

Bob Alverson, Tyler Besecker, Bill Blue, Bernie Burkholder, Ben Clampitt, Paul Clampitt, John Corbin, Michele Longo Eder, Jake Erickson, Georgon (Poggy) Lapham, Heather McCarty, Gary Olsen, Peter Olsen, Burt Parker, Mark Worley

## **RE: Agenda Item H.2**

Chairman Anderson and Council members:

I would like to gather a few thoughts on paper going into the next council meeting that I feel are important. As one of the youngest entrants into the ITQ fishery since the program was implemented I have a unique view of the program. I want to be clear on a few key points on my experience:

- I was not a participant in the trawl fishery prior to 2011.
- my assets and business have come by way of hard work and good timing.
- I do not own any trawl pounds or a base permit.

The forming of the ad hoc committee was a move in the right direction. From observing and participating in both the CAB and GAP process it was apparent that both had difficulty approaching the issue of using different gear types under a trawl permit with objectivity. This is most apparent in the multitude of options that came out of the CAB each one tailored specifically to a CAB members own situation.

Looking at Agenda Item H.2 Attachment 1 I am encouraged that the ad hoc committee will start at the bottom of the issues instead of immediately clamoring for solutions. It is important when considering changing rules to at least recognize why those rules were initially put into place. If there is no longer justification based on the original implementation, that is the most defensible and transparent way to remove or modify a rule. It is a mistake and it becomes quite messy when a rule is removed or modified in order to appease certain participants or specific issues that are not related to that rules initial implementation.

Regardless of which gear type is used or how long someone has participated in the fishery we are all trying to make long term business plans that are stable. As fisherman we deal with a great amount of instability on a regular basis, but I often tell people the one factor in fishing that we cannot bear instability in is access to resource. In 2011 we all began to adapt to the new program in our own ways. The sooner we have a firm conclusion to the allowed gear types and geographical allocation of sable fish the sooner we can adapt and continue planning for our fishing future.

I am looking forward to an ad hoc committee with a progressive attitude focused on recognizing all of the facts and then formulating solutions that consider all factual aspects of the issues.

Thank you again for your time and consideration on these issues.

Georgon Lapham  
aka "Poggy"  
F/V Michele Ann  
Newport, Oregon

Mr. Phil Anderson, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220



March 30, 2018

**RE: Morro Bay Community Quota Fund Support for the Appointment of Mr. Bill Blue as Advisor to the Trawl Allocation and Southern Sablefish Attainment Ad Hoc Committee**

Dear Mr. Anderson,

The Morro Bay Community Quota Fund is writing to strongly endorse the appointment of Mr. Bill Blue to fill one of the six public member seats that will serve as an advisor role on the Trawl Allocation and Southern Sablefish Attainment Ad Hoc Committee recently named by the Pacific Fisheries Management Council at the March 2018 meeting.

Mr. Bill Blue has lived and fished out of Morro Bay, California since 1975, and has over 43 years of commercial fishing history on the Pacific Coast. He has participated in the Shorebased IFQ Program since the start of the program in 2011 and continues to fish in the program currently. At this time Mr. Blue is the only resident fixed gear fisherman that resides and participates in the Shorebased IFQ Program South of 36° N. Latitude. Mr. Bill Blue has also been a member of the California Groundfish Collective (CGC) since 2011 and has collaborated with the CGC to maximize conservation and economic opportunities in the Shorebased IFQ fishery and to retain local access to fish. In addition, given Mr. Blue's capital purchases and significant landings in our port, as well as his extensive experience in the fishery, we believe he would provide unique and incredibly important input and advice on behalf of our port.

In closing, given Mr. Blue's commercial fishing background, Shorebased IFQ Program participation, and home port, we feel he is uniquely qualified to advise this ad hoc committee and the Morro Bay Community Quota Fund strongly supports Mr. Bill Blue as an advisor to the Trawl Allocation and Southern Sablefish Attainment Ad Hoc Committee.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Dwayne Oberhoff".

Dwayne Oberhoff  
Executive Director  
Morro Bay Community Quota Fund