

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