



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

October 10, 2018

Phil Anderson, Chairman  
Pacific Council's Sablefish Management and Trawl Allocation Attainment Committee (SaMTAAC)  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Chairman Anderson:

On behalf of the West Coast Seafood Processors Association (WCSPA), I encourage the SaMTAAC, at its October 11/12 meeting, to advance a comprehensive range of alternatives to address problems related to trawl attainment and sablefish gear switching in the West Coast groundfish fishery. At least half of the alternatives approved for analysis should prevent further increases in fixed gear attainment of trawl-allocated groundfish, and options should be considered to provide for a transition of gear regulations over time to require trawl gear for utilizing trawl-allocated groundfish. We also encourage the SaMTAAC to provide specific and clear guidance regarding economic analysis of the range of alternatives. We feel strongly that the alternatives should be analyzed with explicit consideration of the goals and objectives of Amendment 20 to the Groundfish Fishery Management Plan (FMP) as well as National Standard 1 of the Magnuson-Stevens Act.

WCSPA member companies are fully committed to working with fishermen to increase attainment in the groundfish fishery and fulfill the goals/objectives of Amendment 20. Processors and fishermen have already demonstrated their commitment to this in a number of ways, most recently by developing the West Coast Trawl Gear Exempted Fisheries Permit (EFP), allowing almost 20 million additional pounds of groundfish to be landed this year. As you may be aware, some WCSPA companies are willing to invest in infrastructure (equipment and employees) to process significantly more Dover sole on an annual basis. However, trawlers need access to more sablefish pounds in order to harvest the deepwater (Dover sole, thornyheads and sablefish or DTS) complex, and processors need certainty and stability to make the necessary investments and develop the markets. *We want opportunities to work together to catch more of these fish.*

Thank you for your consideration of our recommendations. WCSPA is committed to working with the SaMTAAC through the Council process to address problems related to gear switching in the most expeditious manner possible.

Sincerely,

A handwritten signature in black ink that reads "Lori L. Steele".

Lori Steele  
Executive Director