

Trawl Stakeholder Group

Mr. Phil Anderson, Chairman,
Sablefish Management and Trawl Allocation Attainment Committee (SaMTAAC)
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

9/24/2019

Dear Chairman Anderson and SaMTAAC Members:

Trawl harvester and processor representatives submit these comments regarding the SaMTAAC's development of a range of alternatives for trawl allocation attainment.

We are concerned that none of the current draft alternatives are consistent with SaMTAAC's charge, because all of them would potentially allow an increase of northern sablefish trawl allocation attainment with fixed gear, and thus reduce attainment of non-sablefish trawl allocations. Only one alternative (#3) has a sub-option to reduce fixed gear attainment below the control date footprint, but that reduction may not come until a quarter century after the start of the catch share program. This is far too long to address problems identified in the five-year review. The bottom trawl fishery needs relief immediately.

Apart from exacerbating the very problem the Council charged SaMTAAC with addressing, the current range of alternatives is too narrow to satisfy NEPA. There should be at least one alternative that would actually have the potential to substantially increase trawl attainment by constraining use of fixed gear.

Included in this letter is a proposed alternative we respectfully ask to be included as written for analysis along with the other alternatives. This alternative:

- 1) Considers fixed gear participation, vessel ownership, and quota share ownership.
- 2) Allows active trawlers a choice to use fixed gear to a certain degree.
- 3) Puts a limit on fixed gear use in order to achieve both program & FMP goals & objectives and comply with MSA requirements, such as National Standard One's mandate to achieve optimum yield from each fishery on a continuing basis.
- 4) Provides certainty about northern sable amounts in the trawl fishery in order for harvesters, processors, and the market supply chain to develop & implement stable business plans and maximize the economic yield of this fishery.

Proposed Alternative:

- 1) North Sable: This alternative applies to northern sable only.
- 2) Exempt Group: Qualified vessels are given a non-transferable exemption to the “active trawler” requirement to use fixed gear. Exempted vessels each have their own fixed gear vessel limit percentage of northern sable trawl allocation that is the greater number of 0.6% or the percent of northern sable QS the vessel owner has owned as of and since the control date. To qualify for the exemption, the vessel must have harvested with fixed gear a minimum of 30,000 northern sable trawl QP’s per year in any three calendar years before the control date.
- 3) Active Trawler Group: A vessel is designated as an “active trawler” at the beginning of each year if the vessel had at least six trawl catch shares landings of 18,000 lbs each (or 9,000 landed in area between 36 & 40-10) in the prior year using trawl gear. A non-exempt vessel must have a current year “active trawler” designation to use fixed gear. An individual “active trawler” vessel’s fixed gear northern sable vessel limit is 1.0% percent of northern sable QS.
- 4) Back Stop Percentages: Set back-stop percentages of the exempt group and the active trawler group to 10% & 10% of northern sable trawl allocation respectively.
- 5) Future North / South Changes: If management changes allow any or all of the 2017 control date southern portion of sable (approximately 24.42%) to be harvested north of 36, this will trigger a reduction in the fixed gear vessel limit & backstop limit percentages such that the poundage limits are unchanged compared to what the poundage limits would have been without any management changes.
- 6) Non-Sable Landings: Fixed gear retention of non-sable species is capped at 10% or 15%.

Thank you for your consideration.

Sincerely,

F/V Bay Islander – Kurt Cochran
F/V Bernadette – Ty Cutting
F/V Cape Foulweather – Ty Cutting
F/V Capt. Ryan – Tom Morrison
F/V Coast Pride – Mike Retherford Jr, Chris Retherford
F/V Excalibur – Mike Retherford
F/V Fishwish – Travis Hunter
F/V Good News – Ian Roberts
F/V Iron Lady – Kevin Dunn
F/V Jamie Marie – Greg Shaughnessy
F/V Jeanette Marrie – Jon Silva
F/V Joy Ann – Paul Ranstrom
F/V Lisa Melinda – Dave Smith
F/V Little Joe – Ralph Brown
F/V Mandy J – Mike Rethford Sr, Mike Retherford Jr, Chris Retherford
F/V Marathon – Kurt Cochran
F/V Miss Emily – Todd Whaley
F/V Miss Sarah – Todd Whaley
F/V Miss Sue – Jim Seavers
F/V Mistasea – Randy Smith
F/V Ms. Julie – Rex Leach, Cody Leach
F/V New Life – Kurt Cochran
F/V Noah's Ark – David Pettinger
F/V Pacific – Mark Cooper
F/V Perseverance – Mark Cooper, Chris Cooper
F/V Pollux – Gerry Hemmingsen
F/V Sea Clipper – Greg Shaughnessy
F/V Seeker – Jim Seavers
F/V Stormy C – Ty Cutting
F/V Tauny Ann – Kevin & Taunette Dixon
F/V Texas Lady – Rex Leach, Bryan Fletcher
F/V Warrior II – Travis Hunter
F/V Winona J – Mike Retherford Sr, Mike Retherford Jr, Chris Retherford
Midwater Trawlers Cooperative – Heather Mann
Caito Fisheries – Jim Caito
California Shellfish Co. / Hallmark / Point Adams – Tom Libby
Ocean Gold Seafoods – Greg Shaughnessy