

RE: Proposed Trawl Stakeholder Alternative 2 for the SaMTAAC

Dear Chair Anderson and Members of the SaMTAAC:

The PFMC charged the SaMTAAC with both: 1) identifying obstacles to achieving the goals and objectives of the catch share plan related to under attainment of non-sablefish trawl allocations; and 2) overcoming identified obstacles by developing options and actions that may modify rules for gear switching by trawl permit holders and QP leasing to vessels using fixed gear.

The current range of proposed alternatives is inadequate, as each does little more than codify the status quo. Maintaining current rules does not address the issue that led to the SaMTAAC's formation, and does not accomplish SaMTAAC's charge to develop new rules that improve attainment of trawl allocations. We write now to present an alternative that does meaningfully address SaMTAAC's singular mission.

We specifically suggest that the SaMTAAC include the following option among those submitted for further analysis:

- Allow only persons or entities that, as of the Control Date:
 - 1) owned trawl quota share;
 - 2) owned a vessel; AND
 - 3) landed at least 30,000 lbs. of trawl quota on their vessel using fixed gear in each of at least 3 years prior to the Control Dateto continue using fixed gear to harvest trawl quota pounds on their vessel up to the following limit (whichever is LEAST):
 - 1) the trawl quota currently owned;
 - 2) the trawl quota owned as of the Control Date; OR
 - 3) the highest annual landings on the owner's vessel of trawl quota caught using fixed gear in any year prior to the Control Date
- Allow leasing of trawl sector quota by trawlers (and prohibit leasing of trawl sector quota by fixed gear)
- Cap the total trawl quota that can be used for fixed gear at no more than 10% of allocated quota lbs.
- Allow trawlers to buy or lease sablefish from the Limited Entry Fixed Gear Tier sector fishery on the same basis and extent that fixed gear (non-trawl) is currently able to buy or lease sablefish allocated to the trawl fishery

The above suggestion offers a viable method of protecting past investment while also reducing the current practice of "gear switching" – that is, re-allocating trawl sector quota to other sectors. It is critical that the SaMTAAC include such an alternative among those recommended to the PFMC for full analysis. Failure to do so would fail SaMTAAC's assigned charge, and prevent the PFMC from meaningfully analyzing the full range of options needed to address recognized issues affecting overall trawl attainment.

Thank you for your consideration.

Sincerely,

Richard Brown – F/V Calamari – Westport, WA
Darren Reef – F/V Pacific Future – Westport, WA
Greg Shaughnessy – F/V Jamie Marie – Westport, WA
Greg Shaughnessy – F/V Sea Clipper – Westport, WA
Mike Allen – F/V Swell Rider – Warrenton, OR
Ken Johnson – F/V Grumpy J – Warrenton, OR
Stuart Arnold – F/V Pacific Conquest – Warrenton, OR
Mike Retherford – F/V Excalibur – Newport, OR
Mikey Retherford – F/V Winona J – Newport, OR
Chris Retherford – Coast Pride – Newport, OR
Riley Holt – F/V Mandy J – Newport, OR
Mark Cooper – F/V Pacific – Newport, OR
Mark Cooper – F/V Perseverance – Newport, OR
Bryson Burns – F/V Coho – Charleston, OR
Buddy King – F/V Pacific Hooker – Brookings, OR
Randy Wenbourne – F/V Miss Pacific – Brookings, OR
Gerry Hemmingsen – F/V Pollux – Crescent City, CA
Randy Smith – F/V Mistasea – Crescent City, CA
Bruce Campbell – F/V Sea Princess – Eureka, CA
Mike Anderson – F/V Triple Star – Eureka, CA
Greg Shaughnessy – Ocean Gold Seafoods & associated companies
Andrew Bornstein – Bornstein Seafoods
Tom Libby – California Shellfish Co. / Hallmark / Point Adams
West Coast Seafood Processors Association
Mike Okoniewski – Pacific Seafood – Portland, OR
Jon Gonzalez – Pacific Seafood – Portland, OR
Pacific Seafood – Warrenton, LLC
Pacific Seafood – Newport, LLC
Pacific Seafood – Eureka, LLC