

North Pacific Fishery Management Council  
604 West 4th Avenue Suite #306  
Anchorage, Alaska 99501

192d Plenary Session – April 1 – 7, 2009  
Hilton Hotel — Anchorage, AK

Re: C-1 GOA Groundfish Management

Public Comment For:  
**CREWMAN'S ASSOCIATION**

By: Mr. Shawn C. Dochtermann  
Kodiak, Alaska

Tel: (907) 486-8777

Mr. Secretary, Chairman Olson, and Council members:

For the record, I'm Shawn Dochtermann, here representing the Crewman's Association based in Kodiak. We represent crewmen on the West Coast and in the North Pacific fisheries.

We're in opposition to the removal of LLPs from GOA groundfish license holders and implementation of Pacific Cod endorsement requirements by the Council. We support the comprehensive and logical statements presented by Chuck McCallum.

At the present time, we favor Alternative 1, for no action — until an accurate problem statement and reasonable alternatives are presented, and backed by full analysis.

The Purpose and Needs Statement is flawed and its reasoning is obsolete.

- Market value has declined, and the ex-vessel price has dropped by 50% in recent months.
- The only type of competition that's wrong is the race for history perpetuated by the Council moving forward with GOA rationalization, sector splits and threats of LLP removal.
- There is no link to conservation, sustainability of the resources, and habitat protection when removing LLPs.

Those arguments were clearly inserted to avoid violating Section 600.330 on National Standard 5, that "no such measure shall have economic allocations as its sole purpose." Furthermore, it makes no sense to change the Purpose and Needs Statement during final action, when stakeholders have relied upon it for years of testimony.

Federal fisheries privatization schemes have already denied many active working fishermen from having access to fishing privileges. The proposed actions will take away the ability to fish Pacific Cod in the GOA from over 400 LLP holders who are active fishermen.

With only 4 LLPs in the under 50' MLOA category remaining available in the Central GOA, that's exclusive entry — not limited entry. This leaves no room for anyone to enter into the small vessel class that characterizes our coastal communities. This amendment also deliberately makes state waters the dumping ground for new entrants.

Sector splits could be done without removing LLPs. There are other ways to keep out encroachment by vessels from other rationalized fisheries. If the goal is to slow down the season, then set trip limits and utilize other management tools.

A properly designed program would allow more present fishermen to remain active, encourage sustained participation of the communities and minimize adverse economic impacts on those communities.

**We propose a 3-year Pilot Program for GOA Pacific Cod.**

- Take certain years' history and split it by sector for the trial period, with no reduction in LLPs or endorsement restrictions.
- Grandfather in vessels over 58 ft. that have history; and all future vessels entering the fisheries must be 58 ft. or under.
- Put in place super-exclusivity to allow fishing annually in either the CGOA, WGOA, BS or AI.

This proposal would protect CQE's concerns, and be in line with National Standard 8 and MSRA Community Protection guidelines.

When the Purpose and Needs reasoning is false, the alternatives won't work.

In closing, we know from state resolution HJR 21 that 18 villages, tribal councils and native corporations in the GOA from Pelican to Perryville, plus GOAC3 also want you to cease consideration of this amendment package.

We urge the Council not to move into final action and to evaluate our pilot proposal.

CREWMAN'S ASSOCIATION

Secretary, Shawn Dochtermann



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**TESTIMONY TO  
THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
APRIL 2, 2009**

**Regarding: C1- GROUNDISH LICENSE LIMITATION PROGRAM (LLP)  
FIXED GEAR LLP RECENCY FOR THE GULF OF ALASKA  
FINAL RULE**

Chairman Olsen and members of the Council:

My name is Gale Vick and I am the Executive Director of the Gulf of Alaska Coastal Communities Coalition (GOAC3.) I am addressing issue C1 – groundfish LLP fixed gear recency for the Western and Central Gulf of Alaska. In the interests of time, I will be reading our testimony but not the attached footnotes that reference several supporting documents. I am providing the Council with written copies for the record.

**The GOAC3 strenuously objects to the extinguishing of Pacific cod endorsements for any current federal LLP without adequately addressing the long-term sustainability of the small communities within the endorsement areas.**

At this and previous Council meetings, you have heard very compelling testimony from small boat fishermen and community representatives in the Central and Western Gulf opposing the proposed action. What you have not heard from is the long list of community residents who could not afford to attend this Council meeting. The appeals of the fisheries-dependent communities are, nonetheless, abundantly loud and clear. There have been literally thousands of testimonies, hearings, studies, meetings, letters, reports, talk shows, articles, interviews, and Congressional and Legislative actions all saying the same thing:

- (1) Quit taking away fishing opportunity for the wrong reasons
- (2) Find ways to increase lost access in meaningful ways
- (3) Provide for the long term sustainability of fishing communities

I have been addressing this Council as a community representative since 1993. That's a long time to witness what is now becoming abundantly clear. Regulatory action is systemically shutting GOA communities out of their adjacent waters fisheries.

The North Pacific sets the U.S. standard for fisheries-dependent communities. The history of fishing dependency in the Gulf of Alaska is well documented. The loss of fishing effort in Gulf of Alaska fishing communities over a very short period of time is also well documented.<sup>1</sup>

**The needs of fishing communities are fundamentally distinct and valuable. This is why Congress created National Standard #8.<sup>2</sup>**

This Council has direct responsibility for not only consideration of those needs but for acting *in meaningful ways* to protect those needs to the greatest extent possible. There should be no possible reason that this Council, in particular, cannot understand the importance of providing for fishing communities in the North Pacific. The CDQ<sup>3</sup> program has long been an example.

There should be no reason why Gulf of Alaska fishing communities are not participating in fisheries in their adjacent state *and* federal waters in the way that they have – in some cases – for hundreds of years. The loss of that fishing effort is due to direct hits on access. Whether intentional or not, the formula is simple but deadly affective. Creation of closed classes = cumulative action = loss of flexibility = destruction of community sustainability.

It is the *flexibility* of having access to a multitude of different species that is the backbone of small community fisheries.<sup>4</sup>

We have said this before. This is not a zero sum game. By providing for the greater well being of our small fishing communities, we are also helping to stabilize the larger hubs and processors. In contrast, the destruction of local fishing communities leads to a multitude of social problems and has a spiraling downward affect on hubs. It means the loss of culture, jobs, means of providing for future generations. The **ONLY** solution is to fix fishing effort in our fishing communities in perpetuity.

The GOAC3 does not see a compelling need for extinguishing so many Pacific cod endorsements on federal LLPs at this time. We are concerned about the opportunity for not only small community fishermen but for all <60 fishing vessels. We are concerned about local crew and vendors that service the small boat fleet. But we are especially concerned about the opportunity for our community fishermen who purchased LLPs in good faith that they would be able to use their LLP to provide flexibility in their multi-species small boat fishing.

However, if this Council's intention is to establish a final rule, we offer the following community provision as an alternative to loss of endorsement on over 60% of the small community LLPs :

- (1) Provide for a limited number of LLP permits with Pacific cod endorsements to each of the 21 CQE<sup>5</sup> communities
  - a. A minimum threshold of 4 LLPS with endorsements to each CQE community
  - b. An additional number of LLPs with endorsements to those CQE communities that have greater than 4 LLPs at risk based on the 1 landing between 2000-2008 requirement on page 93 of the Analysis<sup>6</sup>

- c. Retention of all existing LLPs not at risk in CQE communities to be held in private ownership
- (2) Provide for the retention and transferability of CQE held LLPs
  - a. The LLP to be retained in perpetuity within the CQE communities in the endorsement area
  - b. The LLP to be fully transferable within CQE communities in the endorsement area
- (3) Provide for the LLP to be eligible for either gear type (pot or hook and line)
- (4) Provide for the LLP to be eligible on any vessel <60
- (5) Provide for NMFS/RAM to hold LLPs for CQEs not yet formed
- (6) Require proof of residency in the CQE community of 12 months or more

This is not a perfect alternative and we are concerned about finding administrative solutions to some thorny questions. One would be measures to encourage CQES to consider the continuation of fishing opportunity for current holders of LLPs at risk.

Despite some drawbacks, this alternative does one very important thing: it anchors a certain amount of fishing effort in small communities in perpetuity.

There is no time here to do a point by point rebuttal of all the continuous reasons people have raised, in the course of deciding a limited access action, why coastal communities do not “deserve” special consideration, except to say:

- (1) It is the law
- (2) It is the moral thing to do
- (3) It is the economically smart thing to do for the maximum number of people

**This Council family – all of us included – should not still be asking at this point in time *why* we should be supporting our coastal communities. We should only be asking *how*.**

Thank you.

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<sup>1</sup> For purposes of the record, please note two new major reports:”

(1) “Enclosing the Fisheries; People, Places and Power”, American Fisheries Society Symposium #68, Edited by Courtney Carothers and Marie Lowe, November 2008

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(2) "Access Restrictions in Alaska's Commercial Fisheries: Trends and Considerations,  
prepared by Dory Associates, January 2009

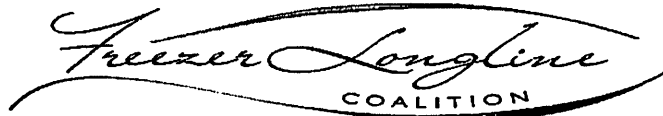
<sup>2</sup> Magnuson-Stevens Fisheries Conservation and Management Act

<sup>3</sup> Community Development Quota program in Western Alaska

<sup>4</sup> See: "Access Restrictions in Alaska's Commercial Fisheries"

<sup>5</sup> Community Quota Entity per Amendment #66 to the Halibut and Sablefish IFQ program

<sup>6</sup>



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NPFMC  
March 2009

April 1, 2009

*Public Testimony on Agenda item:  
C-1*

**FINAL ACTION ON GOA FIXED GEAR RECENCY  
Add Pacific cod endorsements to western  
and central GOA fixed gear LLP licenses**

Chairman Olson,

Council members thank you very much for your time here today and for your consideration of the various issues surrounding the GOA Fixed Gear recency and all items on the current agenda.

My Name is Kenny Down and I am here today representing the Freezer Longline Coalition (FLC). The FLC represents thirty-four hook-and-line catcher processors with LLP's and cod endorsements for the federal fishery. Twenty-eight of these vessels have endorsements for Western GOA, Central GOA, or both.

According to the analysis our fleet brings in roughly 9% of its annual revenues from operations in the GOA and on a per active participating vessel the number is between 5% and 20% (Page 55 and table 3-19, 3-21) a very large portion of the gross revenues in these difficult financial times. This is a Washington and Alaska based and owned fleet.

In 2006, 2007, 2008, and again in "A" season 2009, the Freezer Longline Coalition members voluntarily formed an informal co-op, set self imposed halibut hard caps on each vessel, and limited the number of vessels allowed to fish. The majority of the members "stood down" so the fishery could go forward. During these cooperative fishing efforts participating vessels carried 100% observer coverage, even for those vessels less than 125' that could have carried only 30% coverage. Each vessel voluntarily communicated daily with an independent fisheries monitor and ceased fishing operations when they hit the self-imposed caps. In this way our vessels and others were able to fish when they might otherwise have forced a closure due to the difficulty of in-season management to manage halibut DMR and small remaining cod TAC's with a larger number of vessels.

One of the greatest preconceived visions and realized gains of this effort by the Freezer Longline Coalition's members was the intentional termination of fishing operations in the Western and Central GOA leaving behind enough halibut PSC and P.cod for the local CV fixed gear fleets to operate unimpeded through the end of the year in 2006 and 2007 and A season 2009. The B season 2008 GOA wide halibut DMR cap was reached in 2008 prior to our vessels ability to form a late season cooperative. This 2008 situation highlights the need to have GOA fixed gear recency issues addressed as well as specific P. cod sector allocations.

These types of cooperative efforts should be encouraged within and among sectors. However the GOA fixed gear LLP recency alternatives and components could in the right set of combinations fail to grant a P. cod endorsement to a vessel that would have participated in recent years, but did not for the benefit of others, and to maintain good working relations among sectors. At the same time vessels that may not have been able to fish as the result of closures have had the ability and would receive a Pacific cod endorsement as the result of our group's efforts at cooperative fishing.

Therefore I fully support this action going forward for final action at this meeting and support the AP motion so long as the "Exemption for participants in informal halibut PSC cooperative" remains part-and-parcel of final action motion by the Council.

I have included four supporting documents. Most of this has been presented to the Council in past meetings on recency

1.) **BULLETED DISCUSSION POINTS**

Supporting the need to include the coop exemption in final action.

2.) **GULF COOP INFORMATION 2006-2009**

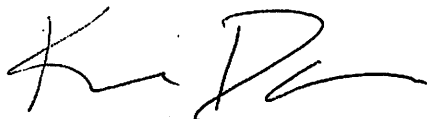
This document details start and end dates for our coops in 2006-2009 showing that in 2006, 2007 and again in 2009 our fleet voluntarily stopped fishing in order to leave halibut and cod available to other fleets and not shut the GOA down as a result of our efforts.

3.) **HALIBUT MORTALITY INFO FOR GULF H&L COOP COD FISHERIES**

This graph demonstrates the mortality rates benefit of fishing in a cooperative manner. Rates for every year have been below the assumed DMR, rates for 2007-2009 are less than half of the assumed mortality rate.

4.) **GOA: PERCENT OF DIRECTED P-COD CATCH OBSERVED BY SECTOR:**

The graph shows the contribution of the catcher processor hook-and-line fleet to the overall observed coverage in the GOA. The information collected aboard these vessels benefits every GOA Pacific cod harvester.



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NPFMC  
March 2009

April 1, 2009

*Talking Points Agenda item:*

*C-1*

**EXEMPTION FOR PARTICIPANTS IN FLC INFORMAL COOPS**

- **Implications of Council action on this cooperative exemption:** If the Council was to choose to allow this action to move forward without the exemption for the cooperative vessels it would certainly eliminate the ability of our fleet to continue these worthwhile and commendable efforts. If the Council was to choose to not put forward this motion as part-and-parcel of the Recency package it sends a clear message "participate in these coops and you will lose your right to fish in the future". This would be a harmful precedent to set and would see immediate ramifications in a return to a race for fish in our sector, and sector against sector that has been largely avoided by the formation of these informal cooperatives.
- **Contribution to catch history:** The vessels that participated in these cooperative efforts, both harvesting vessels and stand-down vessels, each received a halibut PSC allocation from the coop managers. Vessels then "stacked" these allocations in a selection process to determine who would become the harvesting vessels. In this way all vessels covered by this exemption contributed to catch history and therefore should qualify under this action.
- **Relation to Component 5 "The stacking of licenses":** From the analysis and past Council action, it is clear the correct approach to the stacking of LLP's is to allow both LLP's to receive a Pacific cod endorsement. The Cooperative effort is not unlike the stacking of licenses. The effort necessary to try and unravel who deserves the benefits of this catch history would be a huge burden for our sector and would result in an immediate end to the cooperative spirit embodied in these efforts and would discourage these efforts in the future and in other sectors.
- **In relation to the purpose and needs statement:** The LLP holders covered under the coop exemption have all "exhibited a participation in, and dependence on, the fixed gear Pacific Cod Fisheries". Whether as harvesting vessels or stand-down vessels all LLP holders have a definite stake in the fishery and participate as such. The competition and the negotiations have primarily been over who gets to harvest, not on who has to stand-down.

- **In relation to GOA Sector split / Status Quo:** Whether the Council chooses to go through with Sector Splits, or not, has little relation to the coop exemption. Most of the LLP's qualifying with this exemption are in the offshore fleet where the highest percentage of uncaught cod exists (*Analysis table 3-5, page 47*), in addition any Inshore vessel that does qualify for the exemption would only be allowed to fish in the offshore sector until such a time as sector allocations are in place. In the status-quo this fleet must continue these cooperative efforts or would force a closure on itself and other sectors. Not including this coop exemption has the most negative effect on other sectors as the GOA CP hook-and-line fleet will likely be forced to resume a race for fish.
- **Future cooperative efforts in the GOA hook-and-line CP sector:** As our history clearly underscores and as stated in the document our fleet is the most likely to form a fisheries cooperative. We are not seeking to maintain a large fleet of vessels in the future but we are seeking to not eliminate any vessels as options from participating in these harvesting cooperatives that have historically been working with our group in a good-faith effort.
- **Benefits of the Freezer Longline Coalition Efforts**

**Halibut Bycatch:** DMR rates are greatly improved during these cooperative efforts. Actual DMR observed rates average for 2006-2009 are roughly half of the assumed rate. (*Inseason observer data and compiled by coop inseason manager Janet Smoker*)

**Observer Coverage:** Nearly half of the observer coverage in the GOA P cod fishery is provided by CP hook-and-line vessels. (*Percent Observed Catch in Alaska Groundfish Fisheries, 2004-2006 Jennifer Hogan, NOAA Fisheries, Juneau, Alaska.*) The motion going forward without the coop exemption would reduce the level of coverage as all cooperative vessels carry 100% observer coverage, even on coop vessels that only require 30% coverage.

**Bird Bycatch:** Bird Bycatch has been lowered substantially (*Analysis Figure 2-1, page 36*), these continued observed low bird bycatch rates are of paramount importance to the continued CV and CP fleets operation in the GOA.

The cooperative efforts are responsible for much of this benefit and cannot be separated from fleets operation as a whole.

## GULF COOP INFORMATION 2006-2009

COOP DATES	2006	2007	2008	2009
Start	10/22/2006	10/5/2007	2/10/2008	2/9/2009
Finish	11/7/2009	11/1/2007	3/8/2008	2/19/2009

COD QUOTA REMAINDERS	End of Year		Closure Dates		Closure Dates	
Western Inshore	4479	5862	-80	2/29/2008	-546	2/25/2009
Western Offshore	919	872	-23	3/4/2008	550	
Central Inshore	3938	705	-326	2/29/2008	1095	
Central Offshore	1438	1702	557	3/9/2008	217	2/19/2009

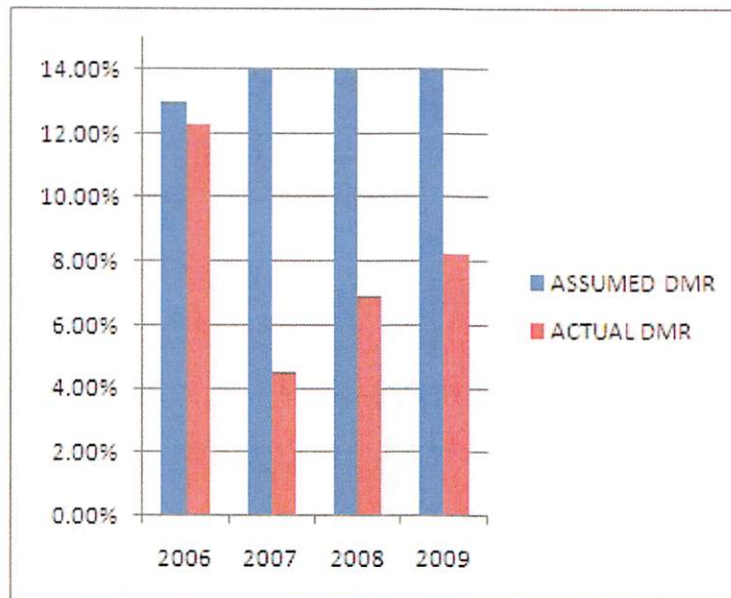
HALIBUT H&L CAP REM.	17	33	45	65
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GULF H&L HALIBUT CLOSURE	No Closure	10/16/2008	No Closure
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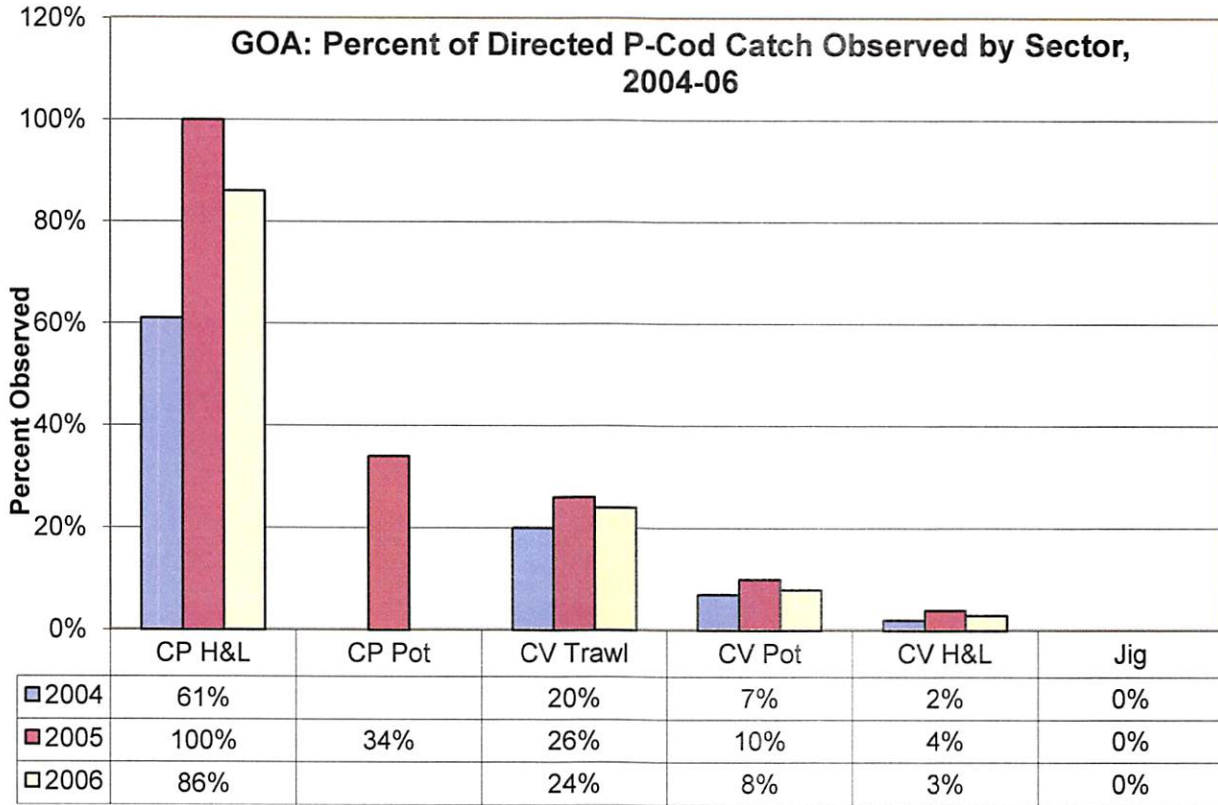
Halibut Mortality Information for Gulf H&L Coop Cod Fisheries

	2006	2007	2008	2009
assumed DMR	13.00%	14.00%	14.00%	14.00%
Coop actual* DMR	12.30%	4.56%	6.94%	8.27%
NMFS halibut mort. (metric tons)	113.95	49.99	34.03	17.15
Halibut mort. using actual DMR	107.79	16.28	16.87	10.13
Difference	6.16	33.71	17.16	7.02

\*based on inseason observer data on sampled halibut condition



**Graph was derived from Data**  
**Percent Observed Catch in Alaska Groundfish Fisheries, 2004-2006**  
 Jennifer Hogan, NOAA Fisheries, Juneau, Alaska



For 2004-06 in the GOA, only 15% of the cod harvest was observed. 82% of all CP H&L directed cod harvest was observed (04-06 average).

For 2004-06 in the BSAI, 77% of all cod harvest was observed. 93% of all CP H&L directed cod harvest was observed. (04-06 average)

In 2006 in the GOA, the CP H&L observed p-cod directed catch was 53% of the total observed p-cod catch. If the CP H&L portion of the total catch and observed catch is deducted in 2006, then only 7.8% of the GOA p-cod harvest was observed in 2006 in all the other sectors combined (if CP H&L is not included).

From: Blake Painter

Chairman Olsen and members of the counsel. My name is Blake Painter and I own and operate the 58 foot cod pot and long line vessel Tradition out of Kodiak. I deeply regret not being able to give you what may be my most important testimony of my life in person, but as you are hearing this, I am in the hospital with my girlfriend as she is giving birth to our first daughter, so I'm sure you understand.

I am a 29 year old second generation Alaska fisherman, and growing up in this industry, watching it go from a public resource that anyone with will and drive could make a living in, to a privatized industry that has pretty much excluded the youth of the industry from ever getting a chance to buy in and stake their own claim.

This is one reason why I would support either, the proposed "no action" or if the council feels it necessary to limit the number of LLP's I would have to fully support the previous A.P's recommendation of December 12<sup>th</sup> 2008, with the minimum landing requirements. And I would support this date because it gave everyone who cared about their L.L.P an ample amount of time to fish and put history on something they obviously sought to keep. I also feel that with the drastically falling cod price and the rapidly rising costs associated with this fishery, such as bait, gear transport and so on. I for see more people getting out of the fishery in the future rather than getting in. I also feel that it is important to mention that as I'm sure you have, or will hear testimony to the fact that there is still, even with the slight increase in participants some quota that usually remains un-caught.

There has been talk about vessels with permits that maybe extinguished could still be allowed to fish in parallel waters. But by doing this, you are simply robbing Peter to pay Paul, in the sense that you are just throwing a whole wad of bigger more competitive boats, right on top of what I'm sure many would already consider to be a small boat and local territorial fishery.

I've also heard it said that we could go to jig fishing, but I think the numbers speak for themselves, in the fact that if a person could make money at it, more of the allocations would be getting caught.

On the transferability issue, I personally find it un-fathomable for any one to say that my L.L.P could be deemed non-transferable. I bought my L.L.P, and have fished my L.L.P exactly the same as anyone who was issued one, or bought one ten years ago. I just don't see how anyone in good conscience could take the right away from me to someday possibly upgrade my vessel or the safety of my operation.

As I'm sure you are well aware, with the cutthroat lease rates in long lining and extremely high permit prices in other fisheries, it is pretty much impossible for anyone to buy into this industry. And I can tell you from experience, that at 28 years old getting a million dollar loan without any help or financial backing was not easy. My L.L.P is the only way I have to support not only my family, but also my crews.

If you decide to extinguish my L.L.P and others like me, all you are doing is driving me into bankruptcy leaving the majority of us with no other source of income, and simply handing the future of this fishery, and the I.F.Q's that I'm sure we all know will come, over to the selected greedy few, who are looking for nothing more than to increase the value of their own permits and future earnings.

I simply ask, no I beg of you. Please don't privatize this industry any further and take away mine and other families livelihood that we have worked so hard for.

Thank you. 58long,19.5 wide,10.5 deep, and 70 gross tons

Mr. Chairman and members of the Council, my name is Chuck McCallum and I am the fishery advisor for the Lake and Peninsula Borough and a board member of the Gulf of Alaska Coastal Community Coalition.

The new NOAA chief, Jane Lubchenco says she knows what Americans want from the Ocean. She says that: "It boils down to clean beaches, safe and healthy seafood, abundant wildlife, stable fisheries and *vibrant coastal communities – not just now but in the future, to share with our kids and grandkids. That's where we need to go. NOAA needs to lead the way.*"

In 1996 Congress made its concerns about the negative impacts of fishing regulations on fishing communities explicit in National Standard 8. Congress, in its desire to give strong guidelines yet allow enough flexibility for the Councils to address the very real complexities of fisheries, communities, and fishery management, used some soft and pliable words and phrases in National Standard 8 such as "to the extent practicable and "...take into account". Since then, in the latest reauthorization of the Magnuson/Stevens Act, Congress showed concern that some Regional Councils are using the National Standard 8 flexibility to effectively game the system and fall short of Congressional intent.

Congress strengthened fishery dependant community language throughout the new MSA and especially when addressing the new LAPP provisions. Congress again made very clear that they were vitally concerned for the health of fishing communities. It is our view that the intent of Congress expressed in National Standard 8 and LAPP Section 303A as well as in the revised "fishing community" definition section, applies to all management changes that would significantly impact fishery dependant communities. Those who have nothing to gain from protecting communities are often heard saying that the admittedly stronger community provisions in Section 303A are just not relevant at all for non-quota programs such is before you now in this LLP License Reduction Program. This is a seriously mistaken interpretation of Congressional intent as is very clearly indicated by the United States Senate Commerce Committee's report accompanying its version of the MSA bill which notes that, **"the committee recognizes that many small, poor coastal communities lack the resources to enter fisheries that may be subject to future LAPPs, and they have often been overlooked in allocation decisions. The Committee cautions the Councils not to use the requirements of section 106 (of the Senate-passed version of MSRA) to prevent these communities from being fully included in**

**allocation of the fishery resource.”** Please notice that the phrase “allocation of the fishery resource” is not tied to LAPP’s or Quota’s and indicates that any time a fishing communities level of access to the fishery resource is impacted by Council action then it is a primary duty of the Regional Councils to so design their fishery management plans to support the socio-economic health of the specific geographic individual fishing communities within the geographic reach of each Regional Council.

There is a strong and pervasive concern in the small communities of the Gulf of Alaska that the North Pacific Fishery Management Council is not taking seriously the community protection provisions in MSA. The Council's prior action on GOA trawl LLPs and the potential approach on GOA fixed gear LLP's to simply grant access rights based solely on the recent fishing history of individuals without a serious regard for what happens at the community level is just business as usual without a serious consideration of the new MSA provisions. This is one reason for the popular support for HJR 21 by rural communities. The smaller, fishery dependent, GOA coastal communities would like to see the Council take the time to develop an LLP amendment package that brings them into compliance with the intent of Congress regarding fishery dependant community protections. The Council should do more than a sort of face saving exercise that, perhaps does the bare minimum to pass legal muster. I'm encouraging you, on behalf of all of the fishery dependant communities in the GOA to be willing to slow down this amendment package and to seriously consider ways to allow some portion of the 600 plus fishermen that will loose access to codfish with the LLP recency requirement to retain some opportunity to use their LLP to fish cod.

I recommend that you support component 7 that would preserve the LLPs for use by residents of smaller fishery dependent coastal communities to fish cod in federal waters. I do understand that the agency has brought up administrative concerns about this alternative and if you decide that those concerns are compelling then I suggest that you find some way to preserve these communities access to the cod fishery that this action puts at risk – at that you should find that solution at this meeting so that this package would not have to be slowed down. However, if you cannot find a solution for these communities at this meeting then I respectfully assert that it is your duty to delay action until a meaningful mitigation measure for the negative impact on these communities is ready for your action.