

CORRESPONDENCE

From: Dan Farnham
Date: Fri, Aug 31, 2018 4:07 PM
To: Michael Pentony;
Cc: Michael Ruccio; Tom Nies;
Subject: Joint Whiting committee and Advisory panel meeting

Dear Mr. Pentony,

As I'm sure you're aware, there was a joint Whiting Committee and Advisory Panel meeting on 8/29 in Providence RI. The purpose of this meeting was primarily to evaluate Amendment 22 public hearing comments on the limited access alternatives and impact analyses and to recommend preferred alternatives to the Council for final action at its September meeting.

Unfortunately, at this meeting we were made aware of a discrepancy in the number of qualifying vessels for each Limited Access Alternative between the Public Hearing Document and the final Amendment 22 Decision Document that was handed out that day. The Public Hearing Document, and the DEIS for that matter, had the wrong number of qualifying vessels for each Alternative. In reality, the number of qualifying vessels for each Alternative would be from 15 to 47 percent less than what everyone had thought they would be and what everyone, including the public, had commented on.

The Committee and the AP strived to develop a set of alternatives with a broad range of qualification criteria in both landings requirement and qualifying period with a range of Limited Access qualifying vessels of between 136 to 316. At this past meeting, after considering public comment, the Committee was in the process of voting on whether or not to make Alternative 4, with 316 qualifying vessels, the preferred alternative when we were informed that in fact the number of qualifying vessels would be 179, or 137 fewer [a decline of 43%]. At this point the Committee voted not to make Alternative 4 the preferred with the debate mainly focused on the reduction in the number of qualifying vessels from what they had believed it to be. The Committee then voted to make Status Quo the preferred alternative to forward to the Council instead of possibly having Limited Access Alternative 4 as the preferred.

As the chair of the Advisory Panel I believe that the Committee and the AP would have developed a different set of Alternatives had we known that there would be so few qualifiers in Alternatives 4 and 5. In light of all this information I don't think that the Council should take final action on Amendment 22 at it's September meeting. The Committee, AP and Council staff have worked long and hard to develop the proper range of Alternatives for Limited Access for this fishery and should be given another chance to do so with the correct information. To force this thru at the September meeting would be unethical at the least. Thank you for considering my views on this matter.

Sincerely,

Dan Farnham AP

aa 9/6/18