

Exhibit C

2024 Commercial and Recreational Groundfish Regulations, and Territorial Sea Plan Revisions

Public Correspondence received as of
November 28, 2023

EMERSON Steven C * ODFW

From: brian trotter <casey253@gmail.com>
Sent: Monday, August 28, 2023 11:19 AM
To: ODFW Commission * ODFW
Subject: Commercial Fisheries Black and Blue Rockfish permits

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Greetings Fish and Wildlife Commissioners,

My name is Brian Trotter. I am a Black and Blue Rockfish (non-endorsed) permit holder as well as a member of the Nearshore Rockfish Advisory group and the Commercial Fisheries Permit Review Board. I am writing to you all hoping to draw your attention to the status of the number of permits in this Limited Entry fishery.

This fishery became Limited Entry by law in 2004. In 2003 in the initial proposal, it is written that one of the goals was to reduce the fleet participation by at least half and to set renewal requirements to eliminate participation through attrition. In 2004 there were 116 non-endorsed permits issued.

According to House Bill 3108 Section 7 (1) The State Fish and Wildlife Commission may establish by rule a lottery for issuing permits to vessels under section 3 of this 2003 act.

(3) Based on the assessment of the resource, the commission may:

1. Suspend the lottery for up to two years; and
2. Renew a suspension of the lottery every two years.

(4) the commission shall establish by rule a threshold number of permits below which the department shall issue permits through the lottery.

According to the Oregon Department of Fish and Wildlife Marine Resources Program Fact Sheet from 12/10/03 (corrected 6/27/17)

Permit Lottery:

The Oregon Fish and Wildlife Commission (OFWC) has established a lottery for issuing future permits. A threshold number of permits for each permit category has been set at: 80 vessels for black rockfish/blue rockfish permits, and 50 vessels for permits with nearshore endorsements.

The very next year the non-endorsed permits dropped from 116 to 69 permits according to ODFW presentation falling below the established threshold. The permit numbers continued to decline. The Commission nor the department ever held a lottery to re-issue any further permits. According to the presentation the number of non-endorsed permits in 2022 is down to 40 permits.

The State continues to require permit holders to meet landing requirements or deny renewal requests while taking no action to make permits available through lottery.

The stock of fish seems healthy and easily supports the current number of permits as our trip limits each year have been increasing.

My first priority in this email is to point out that the actions being taken by the state are not following the established law or rules. Many permit holders don't want to bring this up as the value of each permit is growing with the lowering supply. Also, the number of fish each fisher can catch is increasing with the lowering number

of participants. I worry about our future though. at what point will we no longer matter? At what point will our number be low enough that our voices don't matter to be heard and our fishery is just deleted?

If the current number of permits and participants is where staff believe it needs to be in order manage the fish stocks, then I believe the Commission or Department should re-establish the threshold to the present number of permits. Then, start up the lottery to issue out future permits. Another option I believe should be considered is to remove the requirements for renewal each year, otherwise known as minimum landings. The number of permits is far below the goal that was set in 2003 to reduce the fleet by at least half.

Thank you for your time and consideration.

Brian Trotter

Water Trotter Fisheries

Tillamook County

(503)812-6056