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CONSERVATION COUNCIL**

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Chairman Hansen and Members of the Pacific Fishery Management Council:

Pacific Marine Conservation Council considers the Amendment 21 intersector allocation at least as significant and controversial as the trawl IFQ itself. We also see this as a potential opportunity – a chance to move toward rationalizing the entire groundfish fishery with a progressive design that encourages conservation, rewards innovation, and ensures local access to and benefit from the resource.

If the public is to consider long-term allocation of any species to one gear group, then a hard look at a reasonable range of alternatives, including not changing the current arrangement for the time being is vital. The outcome of an environmental assessment (EA) is a FONSI, a finding of no significant impact. The outcome of a successful environmental impact statement (EIS) is an informed choice, one that will form the basis for much of the future of this fishery.

One of our board members talks about inventing an array of hooks that can be deployed to efficiently catch flatfish, to bring in a high quality, high value product. He should be encouraged. Many on our board envision a fishery that matches up community fishing effort with the biology of the fish populations. They should be empowered. The public process of an EIS is not only legally correct but it can draw out creative contributions from people like these.

About four years ago I spoke with this Council about the need to consider the cumulative effects of the trawl IFQ and an intersector allocation. I was ultimately persuaded and encouraged PMCC to accept the bifurcation of analyses into two EISs – one for the IFQ and one for the allocation. We went along largely because we could see the additional potential of the intersector allocation for bycatch reduction and for modeling the ways that communities might respond to a rationalized fishery. Now we have a deep concern that there might be an attempt to push this through without adequate analysis.

The additional commitment of time and effort to follow through with an EIS will pay off with a stronger foundation on which to rationalize the groundfish fishery. It would be exceptionally false economy to shortchange this process.

Thank you for your time and consideration.

Peter Huhtala