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PFMC



29 December 2009

Dr. Jane Lubchenco
National Oceanographic and Atmospheric Administration
1401 Constitution Ave., NW
Room 5128
Washington, DC 20230

Dear Dr. Lubchenco,

Since 1990, Alaskan Observers, Inc. (AOI) has provided over 300,000 observer coverage days to fisheries in Alaska and off the West Coast of the US, and we plan to be involved in observer programs for the foreseeable future. To that end, I have been following with some interest the development of the Sector Management Plan in New England, set for implementation in May, 2010.

The National Marine Fisheries Service (NMFS) is considering the use of monitors (who would be required to hold a high school diploma) as opposed to observers (who would be required to hold a bachelors degree) for at-sea data collection once New England fisheries convert to sector management. I've heard similar talk, albeit on an unofficial level, at Pacific Council meetings as plans take shape to establish Individual Trawl Quotas on the West Coast beginning in 2011. Given the draft NOAA Catch Shares Policy that was published earlier this month, I expect every region may eventually debate the question of monitors vs. observers.

Proponents of the shift to using monitors advance it as a way to save money, and the fact that catch share programs will tend to recover monitoring costs from fishermen lends urgency to this concern. At the same time, the assumption seems to be that these new monitor-staffed programs will continue to support the science, research, and fisheries and protected resources compliance monitoring that current observer programs support. As catch shares spread from fishery to fishery in the years ahead, the need to independently verify fishermen's self-reported data is only going to grow, so I certainly understand that scaling back observer program functions isn't realistic or desirable. This combination of lowering qualifications and maintaining or even increasing program functions sounds too good to be true. That's because it is. I'm skeptical that any forecast savings associated with switching to monitors will ever actually materialize.

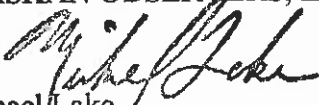
In fact, significant program costs will increase if the at-sea data collectors no longer have degrees in the natural sciences. For instance, training would need to be significantly longer so that

monitor candidates could be introduced to the basics of statistics and random sampling and be taught to use dichotomous keys to identify fish to species. Debriefing efforts by program staff will be more involved and time consuming, particularly during the early part of a given monitor's tenure. Also, the fact that bachelor's degree holders in the natural sciences are professionally vested in their work contributes to one of the greatest sources of cost savings in programs like the North Pacific and West Coast groundfish programs—that being observer retention. I believe deploying monitors in place of observers will decrease retention rates, further exacerbating training costs. And more newly trained people gathering data on commercial boats, regardless of their qualifications, means more failed trips wherein data quality is so compromised that the data must be tossed out. Lost data carries costs that can be immediate—having defensible data is critical to the success of fisheries managed by catch-share schemes—to long term, insofar as managers pondering a dodgy database are inclined to set conservative quotas.

It may well be that people with high-school diplomas can be trained to do the work observers currently do—my goal here really isn't to debate that question one way or the other. I only want to point out that, in the end, reducing qualifications in this way isn't the answer to holding down the costs of collecting reliable at-sea data. Holding down costs is possible, but it's going to be the product of hard work, work that will require coordination among observer providers, groups of vessels, processing plants, and NMFS, work that will need to be tailored fishery by fishery. The sooner people stop falling back on the easy answer of lowering educational requirements, the sooner those of us concerned with this problem can focus on real solutions.

Sincerely,

ALASKAN OBSERVERS, INC.


Michael Lake
President

cc: Dr. James Balsiger
Acting Director
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dr. Ned Cyr
Supervisory Biologist
National Oceanographic and Atmospheric Administration
1100 Wayne Ave., No. 1210
Silver Spring, MD 20910



February 16, 2010

Agenda Item E6

David Ortmann, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

Re: Planning for Community Fishery Associations

Chairman Ortmann and Council Members,

In my oral testimony before the Council in June 2009, I mentioned that an ad hoc advisory committee to address the development of Community Fishing Associations (CFAs) would be a productive step for the Council to take. I am very pleased that the Council appears to be considering the development of such a committee.

As you know there are many “dock level” ideas about how CFAs could be used to adapt to the changing circumstances that the pending trawl TIQ program will produce.

Fisheries resources are very important assets that have powered and will continue to support the economic development of coastal communities in the PFMC region. Much innovation has been generated by fishing communities and their businesses in the last 40 years. CFAs hold the promise to add a new chapter to that innovation.

We support the establishment of an ad hoc advisory committee on Community Fishing Associations and request the Council to take this action.

We would like to suggest that the Council consider a wide complement of representation on the ad hoc CFA advisory committee should it be formed. We would like to propose that fishing communities, organizations with community economic development experience, representatives from existing and emerging community fishing associations and fisheries trusts be considered for membership for at least two different seats on the committee.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Ed DeBorja".

Vice President, Community Ecosystem Services, Ecotrust
Chair of the Board, North Pacific Fisheries Trust

SAN DIEGO FISHERMEN'S WORKING GROUP
8021 LEMON AVE.LA MESA, CA 91941

February 17, 2010

Dave Ortmann, Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: Item E.6 Regulatory Deeming for Fishery Management Plan Amendment 20—Trawl Rationalization and Amendment 21—Trawl Allocation, and Planning for Community Fishery Associations (CFA)

Dear Chairman Ortmann:

On behalf of the Directors of the San Diego Fishermen's Working Group, a recently formed Port Association representing the Commercial Fishermen of San Diego, California. We would like to offer some suggestions and alternatives regarding the planning for Community Fishery Associations (CFA).

As you are likely aware, the Unified Port of San Diego is completing a study titled, "The Commercial Fisheries Revitalization Plan," funded by the California Coastal Conservancy. The plan attempts to identify ways to reverse the local and nationwide trend of gentrification of urban ports through infrastructure improvements and improved public access to the fishing docks.

Additionally, the plan is to develop a direct marketing approach for high value, low volume, sustainable seafood through dockside markets and other direct marketing systems.

In order to implement the revitalization plan, members of our association must have access to a wide variety of fisheries. Our idea is to create and utilize a portfolio based fisheries management system. We as a Commercial Fishing Industry need to recognize that fishermen need to participate in diverse fisheries in both state and federal waters. This includes access to both "limited entry" and "open access" fisheries, and target species with and without fishery management plans.

The success of direct marketing in reducing the carbon footprint and the sustainability of our markets relies on the availability of the community to access a wide variety of fish harvested by our local commercial fishing fleet. Groundfish fisheries are an important part of the portfolio of fisheries on the West Coast, and are a cornerstone of the sustainable fisheries of the future. Access to groundfish by the San Diego fishing fleet would be best served through the establishment of our association as a Community Fishery Association.

We are aware other organizations have asked the Pacific Fishery Management Council to contemplate the formation of an ad hoc Advisory Committee to address the CFA issue. We support the creation of an advisory committee and suggest the membership formation include

representatives from existing and emerging community fishing associations, fishing communities, community economic development experts, and fisheries trusts.

In our opinion, the proper creation of Community Fishery Associations would help us meet our goals of viability and sustainability. It is our sincere belief that we need to move away from high quantity/low quality fisheries to that of high quality/low quantity diversified fisheries that are both economically viable and environmentally sustainable.

On behalf of the San Diego Fishermen's Working Group, we would like to thank you for your time and consideration of our suggestions and alternatives regarding the planning for Community Fishery Associations.

Sincerely,

Peter Halmay

San Francisco Community Fishing Association

Direct from the boat. Fairtrade fish and crabs. Est. 2009

Larry J. Collins • President Joe Garafolo • General Manager



February 16, 2010
David Ortmann, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

Agenda Item E6

Re: Planning for Community Fishery Associations

Chairman Ortmann and Council Members,

The San Francisco Community Fishing Association will be a marketplace for both the public and business to purchase locally caught seafood direct from the source: local independent fishermen who subscribe to sustainable fishing standards. While we wait to acquire funding to build this marketplace we are in the process of forming our association and this process should be completed sometime this spring.

We are pleased to see that the Council will start planning for Community Fishery Associations and we hope that this will result in an ad hoc advisory committee. In communities from San Diego to San Francisco, Port Orford to Neah Bay, there are active small-scale, typically day-boat, fisheries that are participating in low impact fisheries for a range of target species from urchins and crab to salmon and rockfish. Community fisheries trusts and related entities, notable community fishing associations, are emerging as the stewards and managers of fisheries economic assets, and can play an important role in providing jobs and sustainable seafood for the future.

To that end, fishing communities, community economic development experts, and representatives from existing and emerging community fishing associations and fisheries trusts should have seats on the ad hoc CFA advisory committee.

As we move forward with our plans, we will need guidance from the Council and we hope the Council will get good advice. It will be important to have groups like ours on the committee.

Thank you,

A handwritten signature in black ink, appearing to read 'Larry Collins', written in a cursive style.

Larry Collins, President

David Bitts
President
Larry Collins
Vice-President
Tom Hart
Secretary
Marlyse Battistella
Treasurer
In Memoriam:
Nathaniel S. Bingham
Harold C. Christensen



W.F. "Zeke"
Grader, Jr.
Executive Director
Glen H. Spain
Northwest Regional Director
Vivian Helliwell
Watershed Conservation Director
Duncan MacLean
Salmon Advisor

<http://www.pcffa.org>

Please Respond to:

California Office

P.O. Box 29370
San Francisco, CA 94129-0370
Tel: (415) 561-5080
Fax: (415) 561-5464

Northwest Office

P.O. Box 11170
Eugene, OR 97440-3370
Tel: (541) 689-2000
Fax: (541) 689-2500

17 February 2010

Via: E-Mail and Facsimile

Mr. David Ortmann, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

RE: Item E.6 Regulatory Deeming for Fishery Management Plan Amendment 20—Trawl Rationalization and Amendment 21—Trawl Allocation, and Planning for Community Fishery Associations (CFA)

Dear Chairman Ortmann and Council Members:

The Pacific Coast Federation of Fishermen's Associations (PCFFA) represents working men and women in the West Coast commercial fishing fleet. Our members engage in a number of different fisheries utilizing many different gear types including troll, small trawl, trap, gillnet, seine, hook-and-line, and long-lines. These different fisheries constitute the "portfolio" of fishing needed to sustain year-around, professional fishing men and women; they are also needed to maintain the diversity of fisheries essential for sustaining fishing communities/fishing ports.

Moreover, PCFFA members have a direct interest in the groundfish fishery. Some hold trawl permits, some are "open-access" trawlers (i.e., south-central and Southern California trawlers that were denied trawl permits at the onset of the program), fixed-gear permit holders and those in the "open access" rockfish fishery.

As you know, PCFFA has expressed grave doubt over the direction of the current trawl "rationalization" plan. That plan, Amendment 21, as now written, could lead to massive consolidation in the trawl fleet – which has been allocated the lion's share of groundfish resources. Consolidation of vessels and ownership threatens to deny access in the future to

Mr. David Ortmann
17 February 2010
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many fishing communities along the Pacific Coast to groundfish resources in the waters adjacent to their ports.

Community Fishing Associations, PCFFA believes, are an alternative to the privatization of public fishery resources and the consolidation and corporatization that follows most IFQ programs. CFA's give community-based organizations a stake and some management over their local fish stocks that, depending on structure, protect local fishing fleets, processors, port infrastructure, and the public's interest in its public-trust fishery resources. The biological transition from single-species management to ecosystem-based management also demands, PCFFA believes, a socio-economic transition away from the old industrial – and largely non-sustainable – high volume, low value fisheries to a post-industrial model based on smaller-scale operations (that may employ more individuals and vessels than the old systems, and certainly IFQ systems) in high value, low volume portfolio fisheries.

The last reauthorization of the Magnuson-Stevens Act required the regional fishery councils to consider development of CFA's in the context of limited access privilege programs (LAPPs). PCFFA is pleased the Pacific Council now contemplates the formation of an ad hoc Advisory Committee to address the CFA issue. PCFFA strongly supports the creation of an advisory committee and suggest the membership formation include representatives from existing and emerging community fishing associations, fishing communities, community economic development experts, and fisheries trusts.

PCFFA looks forward to the Pacific Council's March discussion of community fishing associations and is pleased to answer any questions or provide any additional information Council members or staff may have prior to your Sacramento meeting.

Sincerely,

W.F. "Zeke" Grader, Jr.
Executive Director

cc: Ms. Monica Medina, Chair, NOAA Catch Share Task Force



Port Orford Ocean Resource Team

P.O. Box 679
351 6th Street
Port Orford, OR 97465
P: 541.332.0627
F: 541.332.1170

info@oceanresourceteam.org
<http://oceanresourceteam.org>

February 17, 2010

Mr. Dave Ortmann, Chair
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: Item E.6 Regulatory Deeming for Fishery Management Plan Amendment 20—Trawl Rationalization and Amendment 21—Trawl Allocation, and Planning for Community Fishery Associations (CFA)

Dear Chairman Ortmann and Council Members:

The Port Orford Ocean Resource Team (POORT) is a community-based fisheries program established in 2003. Our mission is to engage Port Orford fishers and other community members in developing and implementing a strategic plan and framework that ensures the long-term sustainability of the Port Orford marine ecosystem and social system dependent on it. A board of commercial fishermen directs the work of the organization, and a Community Advisory Team links our projects with the broader community of Port Orford. Our fishermen use hook and line gear and pots with small boats (all under 40 feet) and participate in salmon, crab, blackcod, nearshore live fish, halibut and albacore fisheries.

We believe that the West Coast small boat fishing fleet has traditionally been successful because they participate in a portfolio of fisheries. Fishermen move in and out of fisheries in response to changes in access opportunities, generally driven by stock assessments. We are concerned about the future of small boat, portfolio fishing and view Community Fishery Associations (CFA's) as an opportunity to formalize local, small boat, community-based fishing initiatives. POORT also believes CFA's are an alternative to IFQ programs that promote consolidation, while doing nothing to protect fishing communities.

We are pleased that the PFMC will begin to address CFA's at your March meeting. We recognize the Council will seek advice and direction for CFA's, and support the Council immediately forming an advisory committee to work on this issue. In addition to POORT, there are fishing organizations in San Diego, San Francisco, Morro Bay and other west coast communities that are standing by to participate. We also ask that you include economists and economic development specialists on the committee so the full perspective of CFA's will be examined.

Thank you for your consideration.

Sincerely,

Leesa Cobb, Director