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Pacific Fisheries Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, Oregon  
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Dear Member's of the Council,

I am writing this letter concerning the CEQA document for the Channel Islands Marine Reserves. I have been a commercial fisherman for 19 years. My wife and I fish together. And commercial fishing is our sole source of income. Over the last decade we have focused our business towards harvesting lobsters and crabs using traps around the Channel Islands.

At this point I have not completely read the CEQA document. However I have spoken to member's of the department of fish and game and reviewed certain parts of the document. It appears that the document does not fully address the congestion that is going to occur when this plan is implemented.

Every time we lose a fishery, it puts more pressure on the fisheries that are left. The gillnet and abalone closures have already put more pressure on the lobster and crab fisheries. Now the department proposes shrinking the area we get to fish by 25%. This is going to push more traps into a smaller area. Catch per trap is going to decrease. Our productivity is going to be lower. In addition, we are going to have to burn more fuel transiting across closed areas.

In sec. 5.3.1 page 5-17 the document discusses congestion. It appears that the department is going to reduce allowable catch proportionate to the area closure. This reduced quota is going to reduce the total value of the fishery. And this will further reduce our gross income.

I believe that the economic loss is flawed because it ignores these two issues. Our total economic loss has been understated. The true economic loss should be calculated as follows:

$$\text{Economic loss} = \text{Area loss (Departments calculated loss)} + \text{Qouta Loss} + \text{Productivity Loss}$$

It also appears that the CEQA document does not address mitigation strategies for dealing with the congestion created by the proposed reserves. For instance, maybe a buy out plan or an area permit plan could help mitigate the congestion. Another method might be to permit lobster and crab fishing in some of the proposed reserves in order to lesson the economic impact.

In addition, I've been told that the economic impact of the proposed plan exceeds the allowable economic impact permitted by the Regulatory Flexibility Act. I believe that this issue should also be addressed.

Thank you for your consideration.

Sincerely,

J. Kevin McCeney