



Pacific Marine Conservation Council

February 17, 2004

Donald K. Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Re: Individual Fishing Quota considerations for the Pacific Coast groundfish fishery

Dear Chairman Hansen,

Pacific Marine Conservation Council (PMCC) is dedicated to the work of ensuring sustainable fisheries for the coastal communities that depend on commercial and recreational fishing revenue. PMCC is very concerned that individual fishing quota (IFQ) systems, while offering potential for management of certain fisheries, could have negative consequences for the diversity and integrity of historic fishing communities. Without exceptionally thoughtful planning, IFQs could cause far more problems than they are expected to solve.

Establishment of an IFQ program for the West Coast trawl fleet would be a major departure from current management systems. The current IFQ discussion emerges during a period in which the groundfish fishery has already seen substantial change. Rebuilding plans for nine species of groundfish are in various stages of development. The Council has made unprecedented use of spatial management in closing large areas of the continental shelf to specific gear effort. Ninety-two limited entry trawl permits were recently removed from the fishery at a cost of \$46 million. Vehicle Monitoring Systems are being explored as management and enforcement tools. New information regarding bycatch, species distribution, habitat association and co-occurrence of species is becoming available through the West Coast observer program.

Prior to taking the radical step of seriously considering IFQ-based management, it is essential to review and analyze the impacts of recent changes to the groundfish fishery, and new information that is now available, through the vehicle of a comprehensive supplemental programmatic environmental impact statement. The National Environmental Policy Act (at 40 C.F.R. § 1502.9(c)) requires preparation of supplemental EIS when "the agency makes substantial changes in the proposed action that are relevant to environmental concerns;" or when "there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." The groundfish fishery certainly qualifies on both accounts, and it would be entirely appropriate for

the Pacific Fishery Management Council to urge NOAA Fisheries to begin work on a programmatic EIS as soon as possible.

PMCC does not advocate for a programmatic EIS simply to create yet another document. We believe that an open public process examining all aspects of this fishery, in all their complex relationships, will prove valuable as future actions are contemplated – including IFQs.

Ultimately any IFQ system that is developed should meet basic standards to protect sport fishing interests, commercial fishing businesses, coastal communities, and the public interest. IFQs must not in any way be construed to be property rights; rather, they are fishing privileges to be granted for a set duration. There must be fair and equitable initial allocation of shares and strict limits on accumulation of quota. There needs to be a mechanism for independent review of the systems. As an IFQ program is developed, management should seek to preserve the full range of historical participation in the fishery, rather than simply favoring the most efficient operations. Fishermen participating in the groundfish fishery should have the opportunity to vote whether to develop or approve an IFQ system. And the public deserves to see a conservation benefit from granting IFQ privileges, including incentives for use of gear which has the least bycatch and the least adverse impacts on habitat. Unfortunately, what we've seen from the Council's Ad Hoc Trawl IFQ Committee does not conform to most of these standards.

PMCC is providing members of the Council with copies "*Who Owns America's Fisheries*," by Seth Macinko and Daniel Bromley (Island Press, 2002). We offer this information as background on the subject of IFQs and "rights-based" fishing. While we find some interest in the royalty auction described in the text, we are not at this time advocating for such an approach. Macinko and Bromley do offer some fresh perspectives that we hope that the Council members will find intriguing. You might also consider reviewing the National Research Council report "*Sharing the Fish: Toward a National Policy on Individual Fishing Quotas*" 1999, National Academy Press.

Thank you for considering our comments. If you have any questions please call me at (503) 325-8188.

Respectfully submitted,



Peter Huhtala
Senior Policy Director