

PACIFIC FISHERY MANAGEMENT COUNCIL

7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

CHAIRMAN
Donald K. Hansen

EXECUTIVE DIRECTOR
Donald O. McIsaac

Telephone: 503-820-2280
Toll Free: 866-806-7204
Fax: 503-820-2299
www.pcouncil.org

December 1, 2003

Mr. Robert Lohn, Regional Administrator
National Marine Fisheries Service, Northwest Region
Building 1, BIN C15700
7600 Sand Point Way NE
Seattle, WA 98115-0070

Dear Mr. Lohn:

At its November 2003 meeting, the Council adopted November 6, 2003 as a control date for individual quota programs pertaining to the groundfish trawl fishery. We ask that NMFS publish a *Federal Register* notice on this control date as soon as possible.

This control date would apply to any person potentially eligible for individual quota shares. The control date puts those persons on notice that the Council may decide to not count activities occurring after the control date toward determining a person's qualification for an initial allocation or determining the amount of initial allocation of quota shares. The Council is considering both individual fishing quotas and individual processing quotas for groundfish trawl catch. The control date may be applicable to either of these individual quota systems, if such systems are eventually recommended by the Council and adopted by NMFS. The Council could decide to proceed with individual fishing quotas but not individual processing quotas, to proceed with neither programs, or to proceed with both programs.

The primary purpose of the control date is to discourage speculative increases in fishing effort while the Council is deliberating on the IQ program. Deliberations on IQ programs may encourage increased effort if fishers hope that additional landings will qualify them for a greater share of the initial allocation. Such increases can deteriorate conditions in the fishery while the IQ program is being considered. Deterioration would occur through an increase in effort beyond that which would be economically rationale in the absence of the opportunity to qualify for greater quota shares. Additionally, discards could be increased in this multispecies fishery as fishers seek to maximize catch despite having reached limits on the species are necessary to make the trip economically viable. The increased effort would require increased restrictions, to the detriment of those not engaging in speculative fishing. To consider landings during the period of program development would open the possibility that fishers would be rewarded for

Mr. Robert Lohn, Regional Administrator

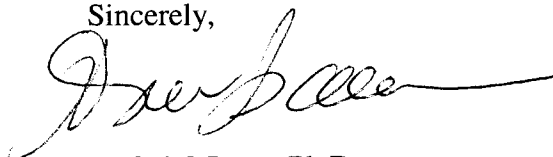
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this detrimental fishing at the expense of more responsible fishers. Additionally, consideration of landings during this period may not necessarily be consistent with allocation criteria. Economic dependence and historical involvement in the fishery are significant criteria on which initial allocation rules are often based. Landings made only on the speculative basis of qualifying for greater initial allocation do not reflect true economic dependence or involvement in the fishery.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. O. McIsaac", with a long horizontal flourish extending to the right.

D. O. McIsaac, Ph.D.
Executive Director

JLS:rdd

c: Mr. Rod McInnis
Ms. Eileen Cooney