



## Pacific Marine Conservation Council

April 27, 2005

Ginny Goblirsch  
Committee Representative, Trawl IQ Committee  
PO Box 9  
Otter Rock, OR 97369

Dear Ginny,

Pacific Marine Conservation Council (PMCC) has on a number of occasions expressed serious concerns about both the process and substance of the development of a trawl-only IFQ program for the west coast groundfish fishery. This letter is not intended to rehash concerns which have been fairly well documented in the scoping documents. Rather, we would like to make inquiry as to specific ways that the TIQC proposes to minimize adverse effects from IFQs on fishing communities.

For example, consolidation resulting from concentration of control of quota shares could have extremely undesirable impacts on some communities; in the worst case loss of the entire commercial fishing fleet, processing capacity and other shoreside support. How does the Committee propose to limit and enforce caps on control of quota shares?

Distributed quota would theoretically be converted to pounds of fish available for harvest each year based on scientifically acceptable criteria. These fish are important not only to the quota holders but also to coastal communities as a vital part of their economy. What provisions does the Committee propose to include in the IFQ program to ensure that quota shares are fished and not just held for investment or as a means of reducing the mortality of individual species?

We are interested in evaluating any proposals the committee may offer to address community concerns. However, we believe that it essential that a separate process be developed to explore a full range of community-based management solutions. This work needs to take place prior to allocations to support a trawl-only IFQ program. If these alternatives are not allowed to be developed, premature allocation decisions could preclude innovative solutions that could better serve both the marine environment and coastal communities.

Sincerely,

Peter Huhtala  
Senior Policy Director

April 27, 2005

Ginny Goblirsch  
Committee Representative, Trawl IQ Committee  
PO Box 9  
Otter Rock, OR 97369

Dear Ginny,

We as members of West Coast fishing communities are concerned that development of the Trawl IQ program is moving forward at a pace that is not allowing for proper public participation and outreach to communities.

Recognizing that the trawl IQ committee has a very specific charge, we request that an additional committee be convened to analyze allocation options including community quota systems. This committee should be working on a parallel path to the trawl IQ committee and providing information to the allocation committee. We appreciate the effort you made to meet in April in Port Orford and discuss some of these concerns.

We are particularly concerned about issues relating to marine and human community impacts resulting from a trawl IQ program. We are also concerned that allocation decisions driven solely by the development of a trawl IQ program will limit the opportunity for development of alternative programs. We feel strongly that significant and meaningful outreach must be done to fishing communities to discuss dedicated access program options and a clear vision of the future structure of the groundfish fishery developed by all sectors of the fishing industry. Communities not interested in, or eligible for, quota through the trawl IQ program should have the flexibility of developing community management alternatives not constrained by allocations that were driven by the development of a trawl IQ program.

Given our concerns outlined above, we respectfully request that the Council convene a separate entity to review community-based options at the same time the allocation committee is doing its work.

Sincerely,

Leesa Cobb, POORT Communication Coordinator Port Orford, OR  
Gary Anderson, Port of Port Orford, Manager  
Bob Francis, Port Townsend, WA  
Jim Hie, Bodega Bay, CA