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PFMC



PACIFIC COAST FEDERATION
OF FISHERMEN'S ASSOCIATIONS

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Agenda Item I.4
September 2008

28 August 2008

Dr. Don McIsaac, Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

RE: Briefing Book Agenda Item I.4 Fishery Management Plan Amendment 22: Open Access License Limitation

Dear Dr. McIsaac and members of the Pacific Fishery Management Council,

The Pacific Coast Federation of Fishermen's Associations (PCFFA) represents working fishing men and women in the West Coast commercial fishing fleet. PCFFA is the largest commercial fishermen's organization on the West Coast.

Many of our members have historically or currently participate in the open access and limited entry groundfish fisheries. We are concerned about the proposal for moving the open access groundfish fishery to a permit fishery. We do not oppose a permit fishery, but we believe that any plan to implement a permit fishery needs to be well thought out and be mindful of those who historically participated in the open access hook-and-line fishery when issuing permits. Over the past thirty years increasingly reduced quotas to the open access sector have discouraged many fishermen from continuing to participate in this fishery. Additionally, the Council has dissuaded these fishermen from pursuing any directed fishery for rockfish while fishing salmon for fear that rockfish landings would be counted as bycatch.

PCFFA believes small boat, fixed gear fishermen play an important role in sustaining local communities. Traps and hook-and-line gear can be selective, low-impact, and provide quality, high value fish for consumers. We ask the Council not to try and pick winners and losers with Amendment 22, but to capture both historic and current participants and then provide incentives for tomorrow's professional fishermen. If the number of B permits must be limited, we

recommend that the initial criteria be expansive with low cumulative poundage levels and an expanded qualifying window capturing landings before 1998. [We also recommend limiting transferability of these permits by state or by subzone within a state]

Permitting of the open access fleet will help the Council achieve its goal of better monitoring and fleet sampling. However, until groundfish populations are rebuilt, any fixed-gear fleet will be constrained more by trip limits and the RCA rather than the overall number of permits. Our fishermen and our communities are already looking to new approaches for sustainable fishing, such as co-management and regional associations. We ask the Council to give our communities the chance to contribute to better management by allowing our members to qualify for permits.

Since many of our fishermen would rather be on boats than in meetings, this is not an easy challenge. We recognize we will need to do more in the future to keep access to the fish that sustain our communities. We look forward to working with the Council on better management of the fixed-gear fleet, including the development of standards for regional fishery associations.

Sincerely,



W.F. "Zeke" Grader
Executive Director