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Mr. Donald K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

We are writing to respectfully urge the Pacific Fishery Management Council to include voluntary community fishing associations in the final preferred alternative for rationalization of the West Coast Groundfish Fishery. As Federal representatives for fishing communities on California's Central Coast, we appreciate the Council's ongoing efforts to rationalize the west coast groundfish trawl fishery and transition management to an individual transferable quota (ITQ) system.

As you are well aware, fishers, fishing related businesses, community leaders, and Council members have expressed concern repeatedly that an ITQ management scheme will lead to increased consolidation of quota and adversely impact small-scale, local fishing operations. Some have argued that quota will be consolidated in the hands of a few large businesses and fishing ports and will reduce overall fishing opportunity in numerous West Coast communities that depend on the groundfish fishery to maintain their fishing business and culture.

Voluntary community fishing associations (association) would allow local fishers to counteract consolidation and to realize a number of benefits, which could include the ability to: (1) anchor quota and access in a community; (2) share risks and costs inherent in the new management regime; (3) offer opportunity for new entrants; and (4) explore more sustainable fishing practices.

Within the West Coast Groundfish Fishery, an association would share many of the characteristics of a harvesting cooperative with the added benefit of being able to own quota share. Owning quota would enable an association to raise capital to acquire quota from local permit holders interested in selling. In this way, associations could help communities proactively preserve local industry and fishing heritage. The association would also provide the quota share to interested fishers and generate incentive to land catch locally and to maintain a high-quality local resource. Support for the association approach has been expressed by trawlers in a number of California ports, including Morro Bay, Port San Luis, Half Moon Bay, Moss Landing, Monterey, Santa Cruz, Fort Bragg, and Eureka.

As we have seen in other ITQ fisheries around the world, the effects of consolidation can be difficult if not impossible to reverse. However, a carefully designed ITQ system can contribute to the sustainability of the resource, the value of the fishery, and the well-being of historic fishing communities. We hope that as the Council takes the next important step in this complex

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and difficult process, you will include options that allow communities to take advantage of the opportunity to preserve their fishing heritage.

Therefore, we urge you to provide for associations within the IFQ process by taking the following actions:

1. Affirm that the Council would like the rationalization program to encourage fishers to work together in community-based associations to anchor quota in its historic location
2. Establish special accumulation limits for associations so they can hold quota share above the limits for individuals, up to some reasonable amount.
3. Allocate quota share to permit holders based on their permit history, but require that amounts over the accumulation limits be divested over a reasonable period.

Thank you for your consideration of our request.

Sincerely,


LOIS CAPPS
Member of Congress


SAM FARR
Member of Congress