

Marine Interests Group San Luis Obispo County

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Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
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RE: Support for Community Fishing Associations (CFAs) in IFQs

The Marine Interests Group of San Luis Obispo County (MIG), consisting of elected officials, scientists, fishermen, conservationists, and business interests, urges the Pacific Fishery Management Council to provide for the development of Community Fishing Associations (CFAs) within the IFQ process by taking the following actions:

1. Develop a framework for CFAs in the current set of trailing actions to be completed by June 2009, including specific accumulation limit rules for CFAs that meet the requirements.
2. Allow entities that qualify for quota share in excess of individual accumulation limits the opportunity to divest of the excess after initial allocation. Low individual accumulation limits without a grandfather or divestiture provision could lead to a major redistribution of access with serious impacts on communities.

CFAs encourage good stewardship. When fishermen, the communities dependent upon them, and the fish stocks have strong linkages together, it encourages shared efforts for effective stewardship. In order to sustain viable fishing communities, communities and individuals need to be able to work together to establish community-based organizations, such as CFAs, that can hold and manage quota following rationalization. A CFA or other such community-based entity would provide an *opportunity* for communities to maintain their participation in the fishery, and would not require an allocation of quota share. Importantly, CFAs provide a foundation for effective ecosystem-based management as called for in the Pew and U.S. Ocean Commissions Reports and the Magnuson-Stevens Reauthorization Act.

Action to permit CFAs prior to initial allocation is critical. Experience indicates that if PFMC waits until after the initial allocation to address the CFA issue, it will become increasingly difficult for new participants or entities--including traditional fishing communities--to enter or re-enter the fishery.

Groundfish are at the core of the Central Coast fishery and have deep ties to our history as well as our contemporary culture and economy. We need PFMC support for CFAs in the IFQs to continue our commitment to sustainable fish stocks and sustainable fishing communities.

Sincerely yours,

Marine Interests Group of San Luis Obispo County