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Nathaniel S. Bingham  
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**PACIFIC COAST FEDERATION  
of FISHERMEN'S ASSOCIATIONS**



<http://www.pcffa.org>

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

RE: Briefing Book Agenda Items: E.2 FMP Amendment 22: Open Access Fishery Limitation;  
E.11 FMP Amendment 20 – Accumulations Limits and Divestiture; E.12 Adaptive Management  
Program

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

The Pacific Coast Federation of Fishermen's Associations (PCFFA) represents working men and women in the West Coast commercial fishing fleet. Among the fishermen belonging to PCFFA member organizations that we represent are many engaged in the open access groundfish fishery, as well as some in the fixed gear limited entry and trawl fisheries.

PCFFA respectfully submits these comments on three briefing book agenda items.

**E.2 FMP Amendment 22: Open Access Fishery Limitation**

PCFFA supports the decision that the Council made at the March 2009 meeting to implement a new registration requirement for the open access fishery. PCFFA believes that this registration requirement in addition to the current management measures such as trip and landing limits are sufficient to effectively regulate this fishery for both conservation and socioeconomic goals.

At the March 2009 meeting PCFFA objected to the Council's preferred alternative, which would have converted the open access fishery into a limited entry system, and maintains that position. Many of our member fishermen reported to us that the limited entry system would have shut them out of the fishery despite their past participation. PCFFA, in conjunction with our port

and marketing associations, conducted an informal survey to gauge how many fishermen would be denied a permit under Amendment 22. Our survey results showed that Amendment 22 would have excluded more than half of the fishermen who historically participated in the fishery. In some ports the percentage of fishermen that would be excluded would have been closer to 75%. The proposed limited entry program was based on a qualifying period when most fishermen who historically participated in the fishery were precluded from doing so because of area closures (the RCA) and low landing limits.

Rockfish have historically been an important part of the fishing portfolio of these smaller hook-and-line open access boats that supply high value rockfish to the market. It has been the smaller hook-and-line boats in the open access fishery that have bore the brunt of rockfish conservation measures for over a decade – they should be entitled to enjoy the fruits of their conservation by being allowed fair access to rockfish stocks as populations rebuild and catch restrictions can be relaxed.

A registration system is sufficient to control access to the fishery in conjunction with additional management measures such as trip and landing limits.

### **E.11 FMP Amendment 20 – Accumulations Limits and Divestiture**

PCFFA has supported and continues to support low accumulation limits in the trawl fishery. PCFFA is troubled by the accumulation limits that the Council has considered adopting. An accumulation limit of 1 percent for most species seems prudent and has been a figure widely used in other IFQ fisheries to avoid excessive consolidation and control of a particular fishery.

It bears repeating that high accumulations limits, which lead inexorably to fleet consolidation, affect adjacent fisheries and smaller ports. The Council should consider the needs of smaller ports and fishing communities when setting accumulation limits. A fleet of 40 to 60 trawl vessels for the entire coast, as predicted in the Amendment 20 EIS, would have a large impact on smaller ports and other fisheries that depend on trawl boats to help support dockside businesses and infrastructure.

In previous public comment PCFFA has advocated for using divestiture fish to fund Community Fishing Associations (CFAs). At the April 2009 meeting the Council adopted a motion to consider allowing CFAs to be “first in line” to access these fish. The question of whether or not CFAs would have to pay for these fish was deliberately not addressed. PCFFA supports the motion made by the Council in April for CFAs to be first in line to access divestiture fish. PCFFA believes that if smaller ports and fishing communities are to survive this “rationalization” process, CFAs are going to have to play a part in allowing these communities to maintain access to their resources. Funding CFAs with fish through various “pockets” of fish is imperative to their success.

### **E.12 FMP Amendment 20 – Adaptive Management Program**

At the May GAC meeting, the GAC adopted a motion to support the “pass through” of Adaptive Management Program quota pounds to permit holders for the first two or three years of the “rationalized” fishery. The GAC recommended a reactive approach in addressing problems that will crop up in the rationalized fishery.

Given the warning contained in the EIS regarding the impacts that trawl rationalization will have on “vulnerable” fishing communities, PCFFA recommends the opposite approach of the GAC recommendation. The adaptive management program should anticipate problems and address them before they develop. PCFFA recommends using the Adaptive Management quota pounds for its original intent – to address the myriad social, economic, and conservation problems that are expected to form at the outset of the trawl rationalization program. The Adaptive Management program was originally designed to help address the transition from one management regime to the next. If the Adaptive Management Program is put on hold for two or three years, it will not be able to fulfill that function.

The experience from other IFQ fisheries has shown that problems due to management transitions need to be addressed before the implementation of a new system. The EIS, though insufficient in its analysis of likely impacts, already highlights some problems that are likely to develop. Additionally the EIS lists ports that are likely to be adversely affected by the management changes. A good starting point for the Adaptive Management Program would be to identify regions and ports that could benefit from the infusion of quota pounds in order to limit the socioeconomic impacts.

Sincerely,

W.F. “Zeke” Grader  
Executive Director