



Canada House 201, MS 9110  
516 High Street  
Bellingham, Washington 98225  
(360) 650-2642  
[www.wvu.edu/bpri](http://www.wvu.edu/bpri)

May 7, 2018

Mr. Phil Anderson, Chair  
And Members of the Pacific Fishery Management Council  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Chairman Anderson and Members of the Pacific Fishery Management Council,

**RE: Regulatory Amendment to HMS Permit Regulations**

I write as Director of Western Washington University's Border Policy Research Institute to encourage the Council to consider the proposed amendment to the Pacific Highly Migratory Species (HMS) regulations extending permit eligibility to American Indians Born in Canada (ABCs).

The Border Policy Research Institute (BPRI) at Western Washington University is a multi-disciplinary institute that undertakes research that informs policy-makers on matters related to the Canada – U.S. border, particularly in northwest Washington. Priority focus areas include: trade and transportation; economic relationships; human mobility; and border security.

Among our stakeholders are ABCs who, under U.S. immigration laws, are afforded unrestricted access to the United States for any purpose; including work. We understand that current HMS permit regulations include the general eligibility requirement that a vessel owner be a citizen of the United States.

The ability of ABCs to work in the fishing and related industries, including in the capacity vessel owners, is an important issue. The HMS regulation restricting ABCs' access from HMS permits is an unnecessary trade barrier that affects our region.

Although the population of ABC vessel owners who would benefit from the amendment will small, the recognition will be significant. It is a move forward that is consistent with widespread federal and state policies that place this special population on equal footing with U.S. citizens.

BPRI supports this proposed amendment, and urges the council to vote to allow the rulemaking process to move forward on this issue.

Sincerely,

A handwritten signature in red ink, appearing to read "L. Trautman", is written over a horizontal line.

Dr. Laurie Trautman  
Director, Border Policy Research Institute, Western Washington University



April 18, 2018

Mr. Phil Anderson, Chair  
And Members of the Pacific Fishery Management Council  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Chairman Anderson and Members of the Pacific Fishery Management Council,

**RE: Regulatory Amendment to HMS Permit Regulations**

I write as Vice President and Director of Advocacy for the Pacific Corridor Enterprise Council (PACE) to urge the Council to consider the proposed amendment to the Highly Migratory Species (HMS) regulations extending permit eligibility to American Indians Born in Canada (ABCs).

Formed with the inception of the 1989 US-Canada Free Trade Agreement, PACE is a non-profit, bi-national private-sector organization that promotes and advances interests in free trade and border-crossing matters by advocating the removal of barriers that impede the legitimate flow of people, goods, and services across the Canada/USA border. Its membership consists of business owners, entrepreneurs, and professionals who share a common interest in an efficient and secure border that facilitates legitimate trade and travel.

Our constituents include a special group to which U.S. law provides unrestricted access to the U.S. for any purpose: ABCs. However, they are not able to fully participate in the commercial fishing industry as vessel owners because of the current regulations that restrict relevant permitting to U.S. citizens.

PACE considers the regulation restricting ABCs from HMS permits to be an unnecessary and outdated trade barrier; and notes that the Magnuson-Stevens Act does not restrict permitting to U.S. citizens. Further, the proposal to extend federal permitting eligibility to ABCs is consistent with other applicable law, and is in step with myriad other federal and state policies that treat ABCs like U.S. citizens.

For these reasons, PACE supports this proposed amendment and urges the Council to vote to allow the rulemaking process to move forward on this issue.

Sincerely,

Jim Pettinger  
Vice President  
Pacific Corridor Enterprise Council  
1465 Slater Road, Ferndale WA 98248