

March 20, 2007

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

RE: COMMENTS ON THE “CONCEPTION” ALLOCATION OF
SABLEFISH BELOW 36 DEGREES IN CALIFORNIA

Dear Chairman Hansen,

The Fishing Heritage Group, comprised of harbor masters, ocean conservationists, and fishermen, is uniquely positioned to forge consensus on fishing and environmental issues in California and build support for PFMC initiatives. One issue that we believe needs immediate attention from the PFMC and NOAA is the current management of the open access allocation of sablefish below the 36 degree demarcation. During the 2006 season, NOAA allotted 271 metric tons of sablefish to the open access fisherman in this region. Unfortunately, the daily catch limits were very uneven and unpredictable, making it difficult for fisherman to plan their harvest and implement profitable day trips. The problem seems to stem from a fluctuating daily limit, varying from 300 pounds per day one week then 500 pounds per day the next week. What we have discovered is that the 300 pounds daily limit leads to very inefficient fuel consumption, and does NOT provide enough financial incentive for a fisherman to conduct day trips and pay for gas, crew, and other operating expenses while turning a profit.

We also observed that only 178 metric tons of the “Conception” sablefish allocation was harvested before the season or year ended – leaving 93 metric tons on the table. While seeming like a small amount of fish, that volume would have been very helpful to the Morro Bay harbor, fleet and economy. We have a new fish buyer in Morro Bay and his company, working with the harbor, TNC and ED and others, is moving towards branding a sustainable black cod product harvested with hook and lines or traps.

We understand that the sablefish “Conception” allocation has been reduced to 211 metric tons this year. Considering National Standard 8 of the Magnuson-Stevens Act, which requires that conservation and management measures “take into account the importance of fishery resources to fishing communities...in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities,” the fishing heritage group wishes to make the recommendation that the daily trip limit be set at a consistent number, say 700 pounds. This will allow for more efficient trip planning and sustained participation while still adhering to the open access allocation.

Sincerely,

Brian Foss – Santa Cruz Port District Director
Jay Elder – Harbor Manager, Port San Luis
Rick Algert – Harbormaster, City of Morro Bay
Steve Scheiblauber – Harbormaster, City of Monterey
Linda G. McIntyre - General Manager/Harbormaster, Moss Landing Harbor District
Peter Grenell – General Manager, San Mateo County Harbor District
Jeremiah O’Brien – Morro Bay Commercial Fisherman’s Organization
Kathy Fosmark – Alliance of Communities for Sustainable Fisheries
Tom Capen – President, Port San Luis Commercial Fishermen Association
Chris Kubiak – Independent fishery consultant, fisherman
Michael Sutton – Vice President, Monterey Bay Aquarium
Rod Fujita – Senior Scientist, Environmental Defense
Chuck Cook – Director, Coastal and Marine Program, The Nature Conservancy

On behalf of the Fishing Heritage Group

FISHING HERITAGE GROUP MEMBERSHIP

Harbors:

Linda McIntyre, Moss Landing; Steve Scheiblauber, Monterey; Rick Algert, Morro Bay; Jay Elder, Port San Luis Harbor; Peter Grenell, Half Moon Bay; Brian Foss, Santa Cruz

Fishermen:

Kathy Fosmark and Mike Ricketts, Alliance of Communities for Sustainable Fisheries;
Jeremiah O’Brien, Morro Bay Commercial Fishermen’s Organization

Nongovernmental Organizations:

Chuck Cook, The Nature Conservancy; Rod Fujita, Environmental Defense; Mike Sutton, Center for the Future of Oceans, Monterey Bay Aquarium

Observer/Advisors:

Greg Haas – District Representative for Congresswoman Lois Capps