



City of Morro Bay
Morro Bay, CA 93442
(805) 772-6200

August 27, 2008

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

Dear Chairman Hansen:

I am writing to let you know of the City of Morro Bay's strong support for the Exempted Fishing Permit (EFP) to fish trawl permits with longline, trap, pot, and hook-and-line gear in a community based fishing association and I urge the Pacific Fishery Management Council to give this proposal favorable consideration at its September 2008 meeting.

This EFP is an innovative partnership between fishermen, local agencies, conservation organizations, and fishery managers. It will show that, by allowing some effort to switch from trawl to fixed gear and by working cooperatively at the local level, we can provide flexibility to adapt to market and regulatory changes. The EFP will inform the process of rationalizing the groundfish trawl fishery and particularly in developing the guidelines for cooperative management under Regional Fishing Associations.

This EFP proposal builds on a foundation set with a 2008 Exempted Fishing Permit. Allowing this project to continue to a second year of operation will maximize the benefits of the lessons learned from the 2008 EFP, providing more data and experience for the partners to decide if and how to formalize the community based fishing association and cooperative fishing in this area into a permanent fishing entity that could hold fishing privileges and oversee cooperative conservation and management activities.

Regulations to protect habitat and overfished stocks, market dislocations, increasing costs and diminishing harvest opportunities, as well as buyouts to reduce trawl capacity have taken their toll on many small communities – such as Morro Bay and Port San Luis - that have historically fished the groundfish resource on the West Coast. This project offers a unique opportunity to turn this trend around and improve both the sustainability of the fishery and the community.

I believe this proposal to be a step in the right direction toward restoring our local fisheries.

Thank you for your consideration of this important innovation in fishing.

Sincerely,

A handwritten signature in black ink, appearing to read "Janice Peters".

Janice Peters, Mayor

FINANCE
595 Harbor Street

ADMINISTRATION
595 Harbor Street

FIRE DEPARTMENT
715 Harbor Street

PUBLIC SERVICES
955 Shasta

HARBOR DEPARTMENT
1275 Embarcadero Road

POLICE DEPARTMENT
870 Morro Bay Boulevard

RECREATION & PARKS
1001 Kennedy Way



ENVIRONMENTAL DEFENSE FUND

finding the ways that work

August 28, 2008

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

Dear Chairman Hansen:

Re: Community Based Fishing Association EFP

We urge you to approve the Exempted Fishing Permit (EFP) to fish trawl permits with longline, trap, pot, and hook-and-line gear in a community based fishing association.

This EFP proposal builds on a foundation set with a 2008 EFP. Allowing this project to continue to a second year of operation will maximize the benefits of the lessons learned from the 2008 EFP, providing more data and experience for the partners to decide if and how to formalize the community based fishing association and cooperative fishing in this area into a permanent fishing entity that could hold fishing privileges and oversee cooperative conservation and management activities.

This EFP, if approved, will test several important hypotheses that lie at the heart of west coast fisheries management:

1. that trawl permits can be successfully fished with fixed gear;
2. that conversion of trawl effort to fixed gear effort by fishing trawl permits with fixed gear can provide social, economic, and environmental benefits;
3. that local fishing effort can be successfully managed by a community based fishing association;
4. that an observer pool can be successfully deployed by a community based fishing association in a way that reduces monitoring costs while still providing 100% accountability for total catch on all trips.

The Pacific Fishery Management Council is currently developing an Individual Fishing Quota (IFQ) program for the west coast groundfish trawl fishery. Options within this IFQ program for allowing gear switching which could be used to support fishing communities. This EFP will reduce uncertainty about how to implement such measures and how they may perform, thus improving the information base for developing a preferred IFQ alternative.

In addition, NOAA has agreed to leverage this EFP by using the vessels participating in the EFP to test Electronic Monitoring technology against human observers and a logbook/audit system.

The EFP presents a rare opportunity to test all of these methods for consistency with one another using coordinated data protocols, as well as for evaluating and comparing costs.

If the hypotheses tested under this EFP are validated, gear-switching and community based management are likely to become effective tools for addressing economic and social problems stemming from declining landings and extremely limited fishing opportunity. Furthermore, these tools will provide conservation benefits by reducing bycatch and habitat impact relative to trawling.

For all these reasons, we strongly support approval of the EFP.

Sincerely,

Huff McGonigal
Senior Conservation Manager
Environmental Defense Fund