



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
 NATIONAL OCEAN SERVICE
Office of National Marine Sanctuaries

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Dorothy Loman, Chair
 Pacific Fishery Management Council
 7700 NE Ambassador Place, Suite 101
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Subject: Agenda Item G.2
 June 2016

Superintendents for NOAA's Cordell Bank and Greater Farallones National Marine Sanctuaries would like to thank the council for supporting the Exempted Fishing Permit (EFP) held by the San Francisco Community Fishing Association (SFCFA) and Dan Platt. We are writing this letter to express our support for modifying the existing permit by reducing the level of observer coverage from 100% to 30%. It is our understanding that the current requirement for 100% observer coverage creates a financial burden on fishermen and is limiting the number of fishermen participating in the fishery. The SFCFA has proposed an option to have fishery observers ride along on 30% of the trips and have fishermen record their own fisheries data for the other 70% of the trips.

We would support this modification if there was a written agreement in place between SFCFA and a recognized fisheries scientist, qualified faculty member or graduate student to conduct an analysis comparing data collected with and without an observer on board. It may also be useful for the analysis to include data collected during the first four years of the EFP when there was 100% observer coverage. We would also recommend that SFCFA work with the data analyst before fishing starts to ensure proper data are collected for the analysis – species, date, location with latitude and longitude, bottom depth, etc.

The sanctuary supports local fisheries, the use of low impact gear, sustainable fishing practices and the potential for economic development in local ports and coastal communities. If harvest using this fishing method is viable, it would provide SFCFA with one more high quality product, allowing them to supply local markets with sustainably caught seafood.

Sincerely,

Daniel F. Howard, Superintendent
 Cordell Bank National Marine Sanctuary

Maria Brown, Superintendent
 Greater Farallones National Marine Sanctuary

