

May 20, 2014

PFMC Meeting June 2014 Agenda Item B.1

Pacific Fishery Management Council
7700 NE Ambassador Pl., Suite 101
Portland, Oregon 97220-1384

Madame Chair and Council,

This is a letter requesting an amendment to Table 2 in the Federal Registry. Specifically, to amend the trip limits for Near Shore and Deeper Near Shore species to allow more than one State issued Near Shore or Deeper Near Shore permit holder to make landings on the same vessel. I propose NMFS add to Table 2 a section that states that vessels with more than one State issued Near Shore Permit aboard may retain twice the limit set by NMFS.

I want to clarify that in California the Near Shore and Deeper Near Shore species are retained only through State issued permits that are issued to individual licensees and that trip landings are allocated to these individual permit numbers, not to the fishing vessels. This is different from the Federal Limited Entry permits, which are registered to the fishing vessel with the associated vessel based cumulative trip limits. Federal LE permits do not allow retention of the Near Shore and Deeper Near shore species of rockfish in California but because these species are managed by the NMFS they are subject to the vessel based cumulative trip limits detailed in Table 2. Because Table 2 refers only to vessels, it doesn't account for licenses that issued to individuals. Fishermen who share a vessel but possess individual and separate Near Shore or Deeper Near shore permits are left without the ability to retain their individual trip limits. This is the issue that we are seeking to address with an amendment to Table 2.

My brother and I, along with many other partnered fishermen in California, are being greatly affected by this aspect of Table 2. We are partners in our fishing business and co-owners of our vessel, and we both possess State issued Near Shore permits. Currently we cannot land our individual Sebaste quotas on our boat because of the vessel based cumulative trip limit specification in Table 2. The only way for each of us to retain our Sebaste quota would be to buy another vessel. A new vessel along with the slip fees, VMS, and added maintenance and fuel costs is not financially feasible or ecologically responsible. The Sebaste allotment is only 600 to 1,000 pounds of fish over a two-month period; this is not worth the costs of obtaining another vessel but does impact our ability to make a living as commercial fishermen in the Near Shore and Deeper Near Shore fishery. We have invested in these permits and should be able to fully utilize them as they are intended.

I respectfully propose that NMFS add a section to Table 2 that states that vessels with more than one State issued Near Shore or Deeper Near Shore permit holder aboard may retain twice the limit set by NMFS and listed in Table 2.

Thank you,
Jason Robinson