June 10, 2011

Mr. Frank Lockhart, Division Manager
National Marine Fisheries Service,
Northwest Region
7600 Sand Point Way, N.E., BIN C15700
Seattle, WA 98115-0070

Subject: California Department of Fish and Game Trawl Rationalization Program Costs

Dear Mr. Lockhart:

The California Department of Fish and Game (CDFG) has reviewed current operations and assumed responsibilities for full implementation of the Pacific Fishery Management Council's (PFMC) Trawl Rationalization Program (TIQ) in the State. While California's trawl groundfish fishery has been slow to start, CDFG has been able to review earlier cost estimates and current costs to prepare this report. It is a fact that Oregon has the largest number of groundfish trawl permits among the three States, however, California has a much larger coastline and number of fishing ports. These two features result in substantial enforcement and monitoring costs that may appear out of line with the size of the fleet. In reality it is very difficult to have an enforcement officer or a sampler travel between Crescent City and San Francisco, a distance of over 350 miles, to conduct their TIQ responsibilities. These may be unique characteristics that need to be considered in any potential funding available to defray State costs in implementing the TIQ on the west coast.

ENFORCEMENT and MONITORING:

Enforcement - CDFG wardens are essential to ensuring compliance and understanding of the new ITQ regulations and the groundfish fishery in general. Wardens are enforcing and monitoring offshore activity such as license requirements, gear restrictions, closed areas, and all of the at-sea regulations associated with the trawl fishery. Wardens are monitoring and ensuring compliance at the dock by monitoring offloads and confirming appropriate documentation of catch for both the State and Federal accounting systems. Complex investigations requiring additional time and significant expertise in the new fishery will require specific training and a dedicated cadre of experienced officers. The wardens work closely with their Federal counterparts to investigate
and monitor the fishery, provide assistance to field staff and serve as the point of contact for the program.

Adequate dockside catch monitoring – Beyond onboard observers and in-plant catch monitors, there is a need for routine dockside checks of catch to ensure that catch information to the species level is fully reported. The goals of dockside sampling are twofold – both biological and for purposes of enforcement. Because some groundfish species (i.e., longspine thornyheads south of 34°27', minor nearshore rockfish (north and south), black rockfish, California scorpionfish, cabezon, kelp greenling, shortbelly rockfish, and especially the “Other Fish” category of groundish) are exempt from TIQ quota share requirements, there is a heightened need to ensure that species composition is properly accounted for. Since gear switching is allowed, tracking issues will be increasingly complex, and will likely involve heightened needs for catch tracking of both the limited entry fixed gear sector and open access sectors of the groundfish fishery. The Pacific States Marine Fisheries Commission currently manages the California dockside commercial groundfish catch monitoring. The funding for that program has been severely eroded over the years and there have been no augmentations. There are increased needs for monitoring the TIQ catch at the dock and additional funds are needed to hire samplers specifically for the program in California.

MANAGEMENT:

Commercial Database Interface – Staff are needed to handle long-term landings and logbook data integration needs. Although the federal catch recording program is electronic, the CDFG does not have an electronic landing receipt system. This person is responsible for coordination and resolution of data discrepancies especially for state managed species and will be assisting enforcement officers with their data needs as they make compliance cases.

Adaptive Management Pounds Program - Once the TIQ automatic pass through program is concluded, a staff (AMP) person will be needed to service the California AMP processes and needs, as well as to address “fallout” from changes resulting from TIQ as shares are transferred and vessels/individuals enter other state-managed fisheries in response (i.e., it is likely that displaced groundfish trawl fishermen/vessels will look to try to move into the California halibut trawl fishery). Additionally, if groundfish resources off California become more abundant as a result of reductions in trawl fishing off the California coast, it is reasonable to expect an increase in requests for Exempted Fishing Permits to the PFMC, or Experimental Gear Permits to the Fish and Game Commission. California cannot absorb these impacts without additional staff support.

PFMC Support for State Staff – The state will continue to be involved in the PFMC Team and Groundfish Allocation Committee meetings, trailing amendments to the TIQ program, meeting preparation and conference calls, responding to members
of the Legislature, responding to inquiries by the Governor's office, etc. As the PFMC budget declines, it is anticipated that the budgetary support for the States will be reduced accordingly. However, the TIQ specific activities within the PFMC process will continue for several years post implementation.

Summary:

I am providing a summary estimate below for all of the typical CDFG staff costs including basic salaries, benefits, general operating, travel, specialized equipment and CDFG overhead. If a more line by line breakdown of costs is necessary, please contact me at the above number.

**Enforcement** – CDFG Wardens - (2 FTEs) ($340,000/Year ongoing)

**Commercial Database Interface** – A Systems Information Programmer/Analyst – (1 FTE) ($120,000/Year ongoing)

**Adequate dockside catch monitoring** - (3 FTEs (Biologists/Fishery Technicians) ($50,000/FTE/year ongoing; total $150,000/year ongoing).

**Adaptive Management Pounds Program** - Associate Biologist (1 FTE full time) ($100,000/year ongoing)

**PFMC Support for State Staff** – ($60,000/year ongoing)

**Total Estimated (ongoing)** - $770,000

Thank you for providing the CDFG an opportunity to share important funding needs with the NMFS for successful implementation of the west coast Trawl Rationalization Program.

Sincerely,

Marija Vojkovich  
Marine Regional Manager  
California Department of Fish and Game

cc: Deputy Director Sonke Mastrup, CDFG - Sacramento  
Asst. Chief Tony Warrington, CDFG - Sacramento