

COMMENTS TO AGENDA ITEM G.2.b., HIGHLY MIGRATORY SPECIES MANAGEMENT (HMS), PRESENTED TO THE PACIFIC FISHERIES MANAGEMENT COUNCIL (PFMC) BY ORLANDO AMOROSO, PRESIDENT OF THE SOUTHERN CALIFORNIA COMMERCIAL FISHING ASSOCIATION (SCCFA), ALSO KNOWN AS THE SAN PEDRO PURSE SEINE VESSEL ASSOCIATION.

Mr. Chairman and Members of the PFMC:

I will be brief and to the point. Thank you for the opportunity to address you on behalf of the twenty plus long line vessel owners that are presently operating out of the port of Los Angeles.

As you know, I am the president of the SCCFA, a San Pedro based organization that represents thirty purse seine vessel owners and a member of the Coastal Pelagic Species (CPS) Advisory Sub-panel.

Less than a month ago, I was contacted by a group of long line vessel owners and asked to give advice on "how they could best influence the HMS Fishery Management Plan (FMP), now in draft form. Although their concerns falls outside the interests of my association, I agreed to conduct a cursory analysis and to get back to them.

I was struck by the apparent lack of any factors and/or analysis that would support the recommendations and the preferred position taken by the plan. More specifically, the plan lacks a "Regulatory Flexible Analysis and a Regulatory Impact Review".

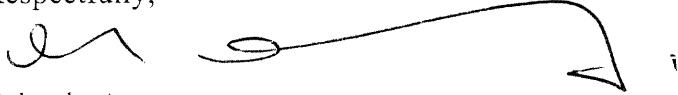
It has become clear to me that the public at large and the HMS advisory body have limited knowledge of this fishery, the face behind the industry, and their impact on state and national economy. Let me highlight what I have learned:

- All the operators and owners are US citizens of Vietnamese origin.
- All of their vessels are U.S documented.
- All of their vessels comply with Coast Guard Fishing Safety Regulations and are suited to have observers aboard.
- Harvesting is already being done in the U.S. Exclusive Economic Zone (EEZ).
- Each vessel is a legitimate and thriving small business making a significant contribution to the local economy and to the tax revenue.
- More significantly, these vessels are a small group of twenty (vessels) out of more than five thousand long liners from Pacific Rim countries fishing outside of the EEZ.

As I am addressing you, these vessel owners are forming a corporation that will be based in San Pedro. Their attorney will soon make available to the council the particulars of this new association.

Having reviewed the draft of the HMS FMP, I cannot but conclude that the long line fishery has not been adequately addressed in the planning process and I urge the council to take the necessary action to correct this deficiency. It is my opinion that the plan is not ready for implementation and should not be adopted in its present form.

Respectfully,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke that ends in a downward-pointing arrowhead.

Orlando Amoroso.