

Coastside Fishing Club
PO Box 1422, El Granada CA 94018

4 P.M. Public Comment 2
March 2004

14 February, 2004

Don Hansen, Chair PFMC

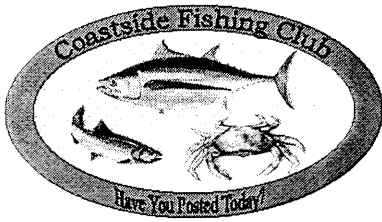
As you know there has been widespread concern regarding the accuracy of the recreational catch estimates generated by the MRFSS process. Consequently, California is replacing that process with its own CRFS methodology. While the Coastside Fishing Club is optimistic about this change, this new system is too new to be a proven estimator of recreational fishing catch. At the November PFMC meeting in San Diego, the Coastside Fishing Club presented an alternate methodology that resulted in significantly lower estimates of recreational catch. However, the Coastside methodology had not been reviewed and approved by the SSC, and therefore California and the PFMC were unable to utilize its estimate in making the 2003 in-season adjustments. We continue improving our process as we prepare to make recreational catch estimates for 2004.

Until the new California CRFS system demonstrates a track record of accurate estimates of recreational catch, the Coastside Fishing Club and the rest of the recreational community will continue to be concerned. In order to develop confidence in the CRFS methodology, the Coastside Fishing Club continues to develop our independent assessment of recreational catch, which may then be compared with the CRFS estimates. Having an independent estimate to compare with the CRFS estimates, can be a powerful tool in the process of validating the CRFS methodology.

Furthermore, having more than one "approved" method of recreational catch estimation would enable the California Department of Fish and Game to evaluate, and adjust for, anomalous variations in any single process. Had this dual capability been available, last year's wave three MRFSS anomaly could potentially have been discarded, and replaced with catch estimates that better represented the actual catch. Or, should both estimates indicate an anomalous high (or low) catch estimate, then confidence in that anomaly would be established.

However, in order to serve as a validation methodology, or as an anomaly check, both methodologies need to be peer reviewed and found to be credible. Consequently, the Coastside Fishing Club requests the PFMC, in particular the SSC, review our process, and either approve its use for these purposes, or suggest changes that would make it acceptable for these purposes.

At the November meeting in San Diego, the Council did in fact ask the SSC to review the Coastside methodology. However the Coastside Fishing Club was unsure how to follow up with this direction. Consequently we contacted Tom Barnes, who directed us to Dan Waldeck. Discussions with Dan clarified that we should make a formal request for



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review via the Chair of the PFMC, consequently this letter to you. In addition, because of the need to validate the untried CRFS process, it is imperative that the Coastside methodology be reviewed at the earliest possible date in order that it be available for use during calendar year 2004.

To that end, please contact Dan Wolford of the Coastside Fishing Club, for information concerning the revised Coastside estimation methodology and data. He can be reached at the following.

Phone	408 356-2465
FAX	408 356-4325
Email	danwolford@earthlink.net
Mail	16171 Jasmine Way Los Gatos, CA 95032

Please let him know the nature of the information required by the SSC for their evaluation of the process, and to determine an appropriate time and place for discussions with the SSC.

Sincerely,

orig /s/ Dan Wolford

Dan Wolford, director
Coastside Fishing Club

Copies to Bob Franko
Darrell Ticehurst
Tom Barnes
Dan Waldeck