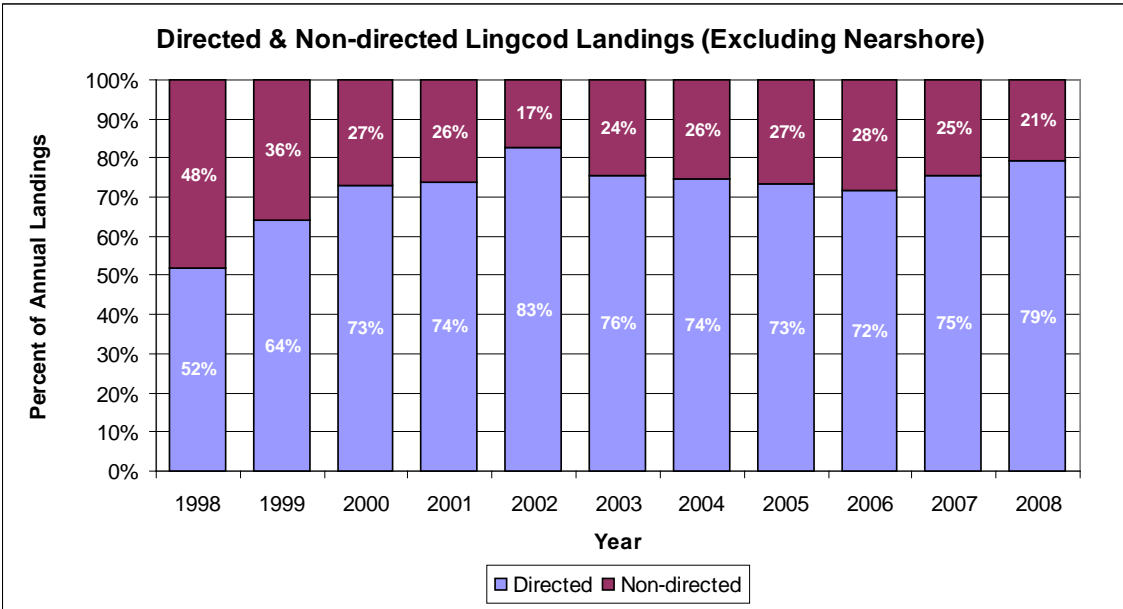


CALIFORNIA DEPARTMENT OF FISH AND GAME REPORT ON FISHERY
MANAGEMENT PLAN AMENDMENT 22 – OPEN ACCESS LICENSE LIMITATION

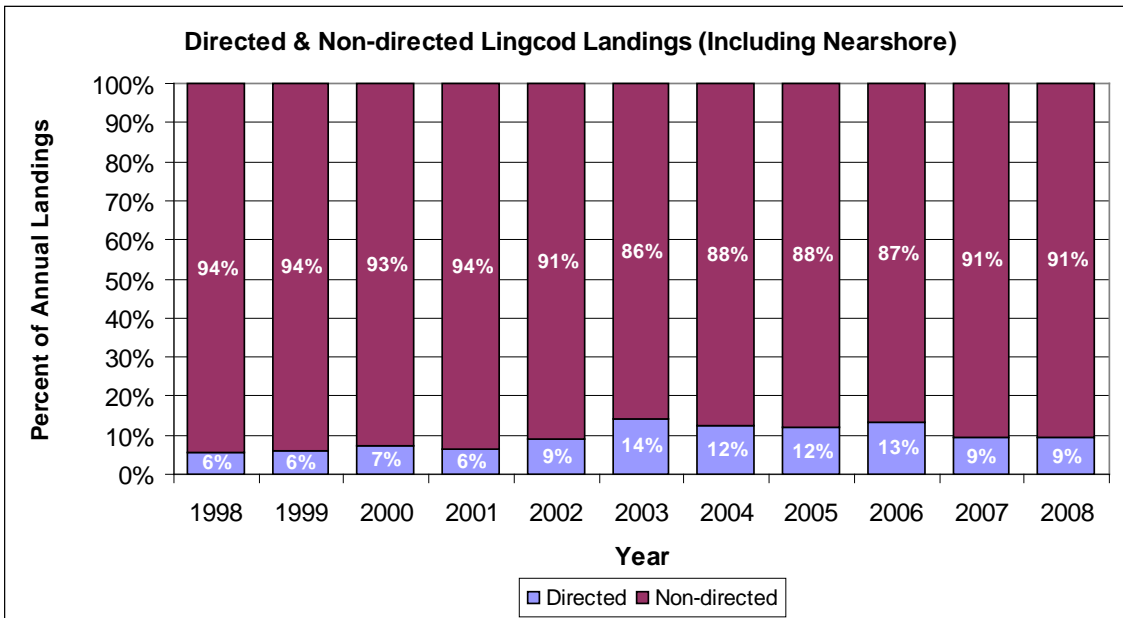
California's open access "fishery" is most accurately described as comprised of fisheries for: shallow nearshore (mostly groundfish) species, deeper nearshore (groundfish) species, sablefish, combinations of nearshore and shelf, shelf and slope, very minor directed fisheries for shelf groundfish, very minor directed fisheries for slope groundfish, and several fisheries that take groundfish by targeting state managed non-groundfish species. It is challenging to really call it a "fishery", however, if we were to identify a single significant directed open access "fishery" then it would be sablefish (and of course the nearshore fishery). Our open access "fishery" overall has been declining - not increasing. In California, the open access fishery (minus the nearshore fishery) is worth about \$1.5 million and about \$1 million of that is sablefish.

We believe the analysis for the EA paints a picture of the California open access fishery that is somewhat misleading relative to identifying "directed" fisheries. While the initial decision to remove the nearshore species from the analysis was intended to prevent vessels from qualifying based on their nearshore landings, we believe the unintended outcome has been to mis-portray some of our fisheries as "directed". Please see the graphics below concerning the EA depiction of California lingcod and shelf rockfish fisheries and our picture of those two "fisheries" when all groundfish species are used. Clearly the lingcod and shelf "fisheries are NOT "directed" fisheries. Therefore any proposal to permit or maintain fleet characteristics for these directed fisheries seems unnecessary. We also believe that the sablefish fishery may be the only open access fishery that warrants a separate "endorsed" permit.

California Lingcod Characterization

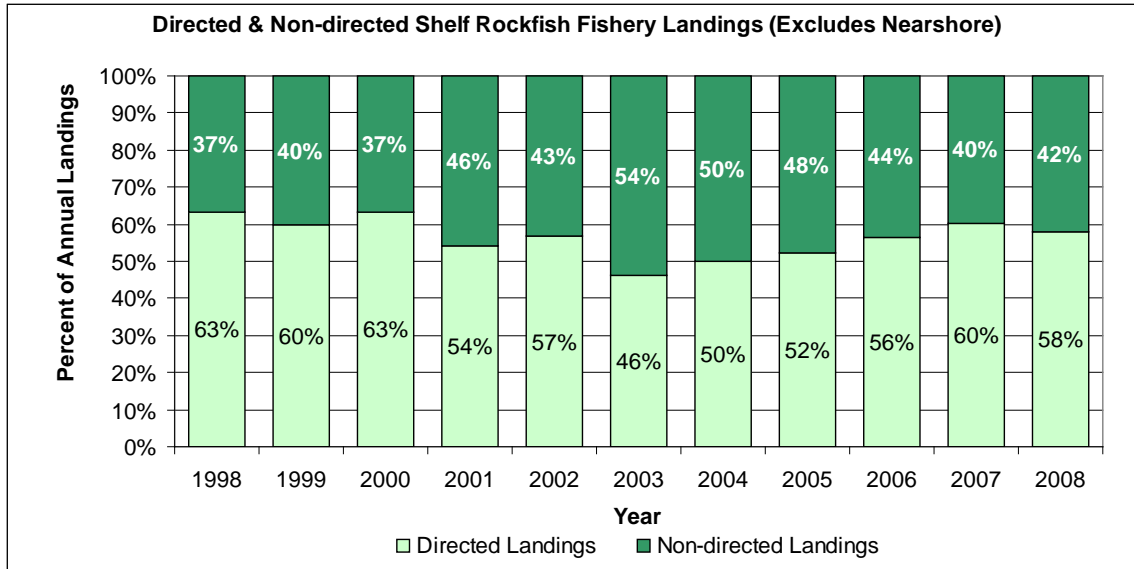


California statewide directed and non-directed lingcod landings where the nearshore species are excluded (as per the EA method).

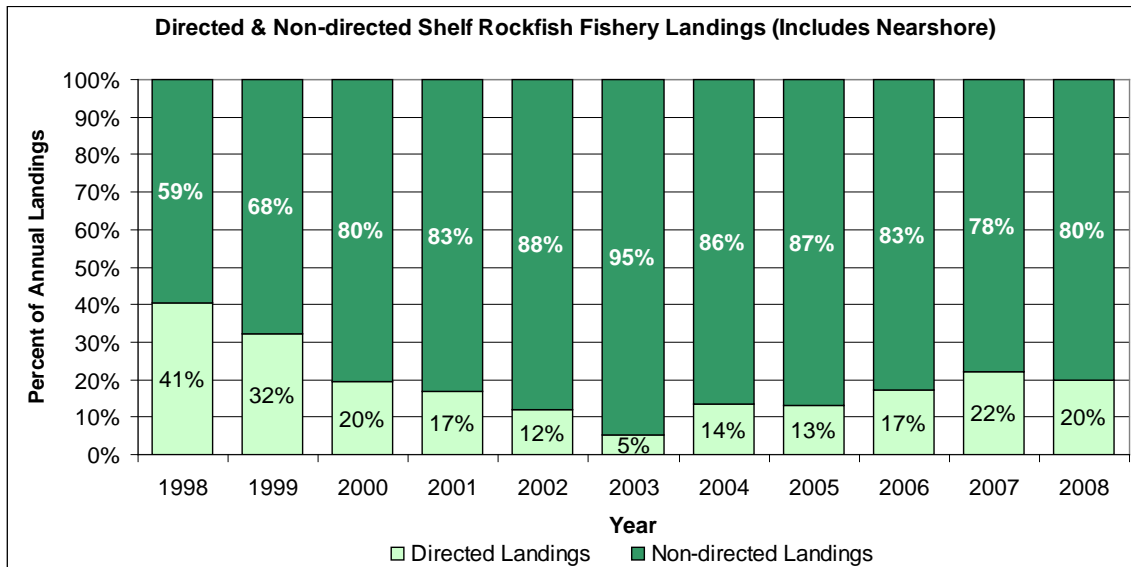


California statewide directed and non-directed lingcod landings where the nearshore species are included.

California Shelf Rockfish Characterization



California statewide directed and non-directed shelf rockfish landings where nearshore species are excluded (as per the EA method).



California statewide directed and non-directed shelf rockfish landings where nearshore species are included.