

Dr. L.E. MacCarter April 2015  
761 Butte Ave, #6  
Morro Bay, CA 93442

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

Public Comment for the April 10-16, 2015 Council Meeting:

I am a biologist and statistician living in Morro Bay, CA and I am concerned with preserving the California Central Coast fleet of small family owned fishing boats which contribute greatly to the economy and human ecology of my region. I am concerned by the possibility of small boats, in various fisheries, being displaced and discouraged. I am also concerned about the food security of the US and of the Central Coast, which is only served by a few through highways and by a fleet of small boats which could supply both locally caught food and bring in supplies given a disaster, such as a severe earthquake, an industrial accident, or an act of war or terrorism. Foreign interests, some of the larger of which are noted for their fishing abuse, would be delighted if our nation were to abandon fishing as a result of over regulation. International law and the clamor of a hungry world would enable them to take over the fishing resource.

The immediate concern I wish to be considered, and at least included in the timely public comments (included by e-mail March 20 before 11pm) is:

**Morro Bay has been allowed access to some community fishing quota, allegedly to relieve hardships associated with regulatory actions affecting us. This quota was purchased from trawlers with the intent of transferring it to lower impact (and lower bycatch) forms of fishing. However, although some of our hardest working and dedicated fishermen have experimented with using a little of this quota, the cost of observers is increasing and already has eaten the profits. No profit means no money to pay owners, captains, deckhand shares, and it means no incentive and no money to spend in the immediate community.**

Monthly costs of observers is projected to be \$5000, which is equal to the monthly stipend or 10 days if observers are paid by sea day. Our average captains/owners risk their lives and do not even make that much money. They have to finance and run what amounts to a small business.

Hook and line and traps for black cod have almost no bycatch. On the other hand, the trawlers, from which this quota came, were having to shovel dead bycatch overboard, which sometimes amounted to 40% or more of the catch, including threatened rockfish species. Of course fishing techniques which have such a potential for waste may need at sea monitoring such as observers or cameras. But, traps with proper safety panels, and hook and line with proper hooks only need a record of fish landed. US boats have nowhere to land fish without them potentially weighed, counted and recorded. Basically, the only fisheries possibly needing at sea monitoring in any fishery are some of those using nets.

**Therefore I, with the support of several local black cod fishermen, am requesting that the Council adopt policies which free all boats that are not trawling, but are fishing black cod with longline or traps, from the crippling cost of observers, because their quota is not being used for trawling. If this is not fully possible through the administrative law processes entrusted to you by Congress, then you surely have some potential for feedback to Congress. So, if existing law renders you impotent in this matter, I respectfully request that you consider drafting a proposal asking the Commerce Committee to introduce a bill to adjust the law appropriately.**



Thank you,

L.E. (Mac)MacCarter, MAg, MPH, PhD

3/20/2015