



March 17, 2016
Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Agenda Item D.2 – Final Action on Regulations for Vessel Movement Monitoring

Dear Madam Chair Lowman and Members of the Council,

The Ventura County Commercial Fishermen's Association strongly supports the No Action (Status Quo) alternative on regulations for Vessel Movement Monitoring.

It is the opinion of the VCCFA that the U.S. has the best-managed fisheries in the world. This is something we are very proud of, but these conservation and management gains came with a huge cost to the industry. Consequently, the number of commercial fishermen in California has declined over 75% over the last 30 years. It's no wonder that we have to import over 90% of the seafood we consume in the U.S.

Today, from a managerial standpoint, it should be a moral imperative to conduct a careful cost/benefit analysis when considering any additional regulations to any U.S. fishery in order to protect the livelihoods of the few remaining U.S. fishermen we have left. In doing so, it's easy to see that increasing the ping rate will result in a substantial increase in costs with zero conservation benefits. Furthermore, the current ping data compiled by the HMSMT demonstrates that increasing the ping rate will not provide any additional supplemental data for management or enforcement.

While increasing the ping rate increases costs, a continuous transit requirement would decrease gear flexibility and productivity. For example, if a DGN vessel is in transit through a whale closure zone and has the opportunity to harpoon a fish, they would not be able to do so under this proposed requirement. So again we have another proposed requirement where the cost far outweighs the benefit.

For these reasons we ask the Council to vote for the No Action alternative. Thank you for your careful consideration.

Sincerely,
Jonathan Gonzalez Tim Athens
President – VCCFA Vice President – VCCFA

Point Conception Groundfishermen's Association
Santa Barbara, CA

March 17 2016

To Madam Chair Lowman and all members of the PFMC,

The Point Conception Groundfishermen's Association strongly urges the Council to do the right thing and vote for 'no action or status quo' at this time on Agenda Item D.2, Vessel Movement Monitoring at the April 2016 Council meeting in Vancouver, WA.

We are sympathetic, and fully understand the conundrum that the OLE finds itself in as a result of the Risa Lynn case. However, this situation does not trump the message the Council will be sending to the entire west coast commercial fishing industry by expanding already burdensome VMS requirements for one user group and let another go completely unmonitored. Regardless of there being no 'legal requirement' to impose VMM on other sectors, this action would be viewed as discriminatory at a minimum and interpreted as a complete disregard to the spirit of the Council process. This Council is charged with oversight of the industry and when the Council takes an action such as this, shouldn't there be at least a basic level of moral credibility involved?

We ask any Council member, if you were in our shoes how would you react to this potential action knowing full well its inherent unfairness? Is this the kind of climate you want to promulgate on an industry already on its knees?

Please, do not go forward with VMS expansion and take no action at this time until all sectors are equally monitored.

We thank you for your considering this matter.

Tim Athens
PCGA