



# Southern California Trawlers Association

Agenda Item D.2.b  
Supplemental Public Comment 2  
April 2016

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March 23, 2016

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Chairwoman Dorothy M. Loman  
Vice-Chair Herb Pollard  
CouncilMembers

PFMC

RE: PENDING COUNCIL DISCUSSION/DECISION ON CHANGES TO VMS

Dear Officers and Members of the Council:

While it would be nice if VMS were a “one-size-fits-all” application, the truth is, it is not. If this were not the case, you would not be sweating the fact that VMS changes, including the 4-ping/hour option, are only being applied (completely inequitably) to only a segment of those commercial fishing vessels, passenger or otherwise, who take groundfish for profit, rather than all vessels, commercial and commercial PFV, equally, across the board.

In the case of many of the members of our Association, VMS doesn't fit, either. We trawl for California Halibut (not groundfish), sea cucumbers (not groundfish), and ridgeback prawn (not groundfish). Yet the Council and NMFS have interpreted the byzantine regulations promulgated on the subject in such a way that my boat, for example, a 36-foot trawler that does not take groundfish, must still pay for purchase and monthly operations fees for a VMS. It makes no sense whatsoever, and is an economic hardship for small-boat independent operators, who are being squeezed right out of the commercial fishing business by ITQ inequities, regulatory inequities, and market share squeeze.

Until such time as the Council can find a way to apply VMS rules equitably across all segments of those who take groundfish for business purposes, VMS regulations should be set aside. Without such equity, the Council faces a serious credibility challenge. We urge you to do the right thing: take no decision on any changes to the current VMS system until the equity issue is successfully resolved.

Thank you for considering our views.

Sincerely,

Mike McCorkle,  
President