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Subject: Transfer of California Nearshore Fishery Permits
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

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Council Members,

Representatives of California's Department of fish and Wildlife recently presented a proposal to the State Marine Resources Committee that would alter the requirements for transfer of California Nearshore Fishery permits and establish requirements for the transfer of California Deeper Nearshore Fishery permits.

California's Nearshore Fishery is divided into four regions and each region has its own capacity goal. The Deeper Nearshore Fishery is statewide and currently has no capacity goal. Participants in the Nearshore Fishery hold state issued permits that are either transferable or non-transferable. Non-transferable permits expire upon non-renewal. Transferable permits must be combined with another transferable permit in a two-for-one package. This system requires that one permit be retired in an effort to reach the capacity goal.

DFW intends to abandon the two-for-one system and go to a one-to-one transfer. Although this would create a higher number of permits than the capacity goal, DFW explained that increased fish stocks, trip limit management, and the variable nature of multi-fishery participants would offset any increase in long term participation.

The new transfer provisions seem to be the right choice. The two-for-one system has removed some permits but has been a burden for both new entrants and those leaving the fishery, and as stated by DFW, there are other mechanisms in place to control the harvest.

Before the presentation at the MRC meeting DFW sent a survey to all Nearshore and Deeper Nearshore permit holders asking for their opinions on a variety of questions pertaining to both permits. DFW was concerned that those holding only a Nearshore permit were discarding excessive amounts of Deeper Nearshore stocks. Instead of using TRUE DATA collected from observer coverage, permit holders were asked about Deeper Nearshore discards and if they would like to possess a Deeper Nearshore permit.

At the MRC meeting DFW presented a pie chart graph that indicated a high percentage of RESPONDENTS wanted the Deeper Nearshore permit to become transferable REGARDLESS OF THE POTENTIAL TO REDUCE TRIP LIMITS. There was no breakdown given as to how

many responses were received or whether the respondents were active or inactive. Based on the survey response DFW recommended that ALL Deeper Nearshore permits should be transferable.

Changing to a one-to-one transfer of Nearshore permits will create a pool of 124 transferable permits statewide. If the DFW goal is to stop discards in the Nearshore Fishery the number of Deeper Nearshore permits should not exceed 124. Currently there are 180 Deeper Nearshore permits, many of which are inactive. If all 180 are transferred a similar discard situation will continue to happen. In addition, the amount of effort created by the transfer of Deeper Nearshore permits should not create a situation where Trip Limits are lowered in any sector.

The PFMC should offer input and guidance to California so that these changes go smoothly and do not alter Nearshore fish stocks or make changes to Trip Limits.

Thank You.
John Law
F/V Wild West