

Pacific Fisheries Management Council

7700 N.E. Ambassador Place, Suite 101

Portland, OR 97220

Re: CPS Small Scale Fishery Alternatives

Dear Council and Staff,

Thank you for your kind consideration of the plight of small scale CPS fishermen. We are writing in support of alternative #3 on agenda item G.3.a., (less than one metric ton landing option for CPS). In July, we inquired as to the possibility of retaining “small” amounts of sardines taken incidentally while supplying live anchovies to the offshore “live bait” albacore fleet. Here in California there is a continual, but limited demand for sardines for specialty bait (frozen) and iced fresh sardines for human consumption. Having the opportunity to land less than two tons during periods of seasonal closures would allow these small markets a little supply stability and help in a limited way for the handful of boats left fishing lampara round haul gear trying to stay in business. Most of these boats rely on a mixture of various fish landings to remain viable for the families that run them. Because of the boats’ small size (less than 35 feet) and small crew, these operations can operate profitably far below the required landing levels for the modern purse seine fleet with 50-110 ton capacity ranges. We don’t need to kill and half a million pounds of fish to provide a living wage for our families.

Concerning agenda item #G.3.a., here are a few important points.

- A. Amount of Fishing – the amount of less than one metric ton is enough to make it affordable for our local buyers to ice, box and truck (or freeze) for restaurant and bait customers in the San Francisco area from our Port of Eureka. Greater than one ton per day (like 2-3 tons) begins to convert this fishery from an artisanal level to a directed fishery, which we believe is not the Council’s intent. Less than ½ ton per day drops below the economy of scale of even small profitability for little boats.
- B. Any permitted landing limit should be for one 24 hour period, not multiple trips per day. Again, we believe the intent is to permit fishing on a very small scale only.
- C. CPS permits holders have expressed concern that this proposal will spawn a “new” CPS fishery by Dungeness Crab boats seeking sardines for crab bait which in turn will use up the 7000 MT quota for mixed incidental take of sardines in CPS fishing operations. We believe this will not occur. Here’s why, we have been Round Haul fishing for CPS species for 20 years via lampara net gear. Our summer customers, most of the pole and line “live bait” albacore fleet, do not own bait nets, and do not want to own bait nets. Even experienced Bait fishermen owning their own nets and haulers hire us to catch their bait. There is tremendous resistance and reluctance to invest in and develop the skills for this type of fishing. Nets (which we build) cost on average

\$8000.00 and associated hauling equipment (another \$5000.00) are not worth the investment to target less than one ton of sardines for crab bait.

- D. Limited Entry Permits for less than one ton –We would recommend against the proposal to issue Limited Entry Permits for this proposed amendment. Issuing Limited Entry Permits opens again the Pandora’s Box of Permit speculation, right to future fishery access, transformability, and sale of permits, all which have created a concentration of fishing opportunity to the detriment of young fishermen.
- E. Fee – We would support a fee for this privilege.
- F. Timeline – we would support Option #3 as a temporary experiment. One year with automatic renewal if no unforeseen issues arise.
- G. Fishing Mortality – we have been fishing lampara gear for twenty years. We have no incidental mortality during our fishing operations. For the last two years we have worked with CDF&W staff conducting a survey on spawning Pacific Herring with lampara gear. Please take twelve minutes of staff and council time to view the CDF&W YouTube video, depicting our work at YouTube, Lampara Net, Humboldt Bay Herring.

Finally, there may be some concern on the part of the California Wetfish Producers Association over Option #3. We would remind the council and CPS management team that many of the fishermen in the Wetfish purse seine fleet are 2nd and 3rd generation round haul fishermen who grew up on small boats of their fathers and grandfathers, fishing the exact kind of gear we use, delivering to the same small markets we continue to fish for. Please rely on the experience and wisdom of these older fishermen when evaluating our request and our fishing gear.

Sincerely,

Ken Bates and Linda Hildebrand

F/V Ironic, Eureka, CA

March 16, 2017

Pacific Fishery Management Council
7700 NE Ambassador Pl., Ste 101
Portland, Or. 97220-1384

To whom it may concern:

In 1939 the original Umpqua Bait Company was started. Over the years there has been many different owners, but has always been known for its top quality bait. Umpqua Bait is an integral important part of the Winchester Bay community. It is the only business of its kind on the west coast of Oregon.

Umpqua Bait is a retail and wholesale bait dealer that sells fresh and frozen bait. During the summer months we try to catch bait fish such as herring, sardine, or anchovy using our beach seine. We are a small scale operation and don't catch near the amount of bait as a purse seiner would in the river or ocean. Also, we are only permitted to fish in the east or west basin of the harbor and the fish don't always come in the basins. Generally, they stay in the bay and river. It's hard enough trying to make a living when your business revolves around mother nature, but when the sardine fishery was closed, it really hurt our business.

Usually when we catch bait we like to sell them live or fresh off the dock to the local fishermen and tourists. They can either walk down the dock or swing in by boat as they are leaving the harbor to go fishing. We also process and freeze the fish on trays and then vacuum pack them. The finished product is like what you would see in a tackle shop's bait freezer; frozen trayed bait. Either way we sell the bait, it is a vital part of our success. The profit we get when we catch our own bait and process and sell it, is about 80% of our gross. So if we cannot sell and process the sardines, we could lose \$100,000 or more. We can buy frozen bait elsewhere to re-sell, but there is not much money to be made by doing this. Also, we do not get to choose what kind of bait might swim into the harbor. There are even years when nothing comes in, which cannot be helped. It is disappointing when the sardines come into the harbor and we cannot process and sell them.

Winchester Bay is a very popular vacation destination with lots of things to do. Some of the main attractions are fishing and crabbing in the river or ocean. The most important thing about fishing is top quality bait and that is what we are known for. Fishermen come from the valley and up and down the coast to buy our local fresh caught bait. Umpqua Bait is a huge draw to the Winchester Bay community. The sardine closure does not only affect us, but other businesses such as, motels, restaurants, rv parks and local convenient stores, etc.

It would be greatly appreciated if a small quota or pounds of fish were allotted to us to catch daily or weekly. Anything would be better than it is now. Thank you for your time and consideration.

Sincerely,
Josh and Alisha Hoile
Umpqua Bait, Inc.
PO Box 1207
Winchester Bay, Or 97467

Pacific Fisheries Management Council
7700 N.E. Ambassador Place, Suite 101
Portland OR 97220
PFMC.comments@NOAA.org

Re: Agenda item G.3.a

Council Members,

We are writing on behalf of our membership in support of Option 3 for agenda item G.3.a, providing for less than 2000 pounds of sardine deliveries during “closed” seasons. We understand that this proposed amendment is directed as relief for very small fishing operations.

This summer in Humboldt Bay, the 4 or 5 boats fishing “open access” sablefish had difficulties obtaining bait for their long line gear. Market squid was only limitedly available and expensive. One fish company here is trying to import “bait grade” sardines from Europe! While there is only one boat here in Humboldt Bay with a “bait net” and experience, we feel this fisherman would be able to provide small amounts of sardines for the few Black Cod boats fishing here.
Thank you for your time.

Sincerely,

Scott Creps, President
Humboldt Fishermen's Marketing Association, Inc.