

COASTAL & OFFSHORE PACIFIC CORPORATION

242 Rosa Corte
Walnut Creek, CA 94598
925.989.4701
dex1007@sbcglobal.net

Agenda Item H.3.b
Public Comment 1
November 2017

October 04, 2017

Mr. Phil Anderson
Pacific Fishery Management Council
1100 NE Ambassador Place, #101
Portland, OR 97220

Dear Chairman Anderson and Members of the Council:

Frank Crivello and I submitted our application for Standard Buoy Gear Exempted Fishing Permits to the Council on August 14th of this year. The HMSMT, the HMSAS and the Council approved our application for further consideration at the September Council meeting in Boise, Idaho.

We would like to take this opportunity to expand on the rationale for our application and the geographic specifics contained in our application.

As noted in our application we own and/or operate two pelagic fishing vessels (21 and 23 meters) with crews of 6 or 7 people. We operate year around and for about half of that time we fish in international waters for HMS, primarily tuna and swordfish. If we are able to obtain EFP's for Standard Buoy Gear (DSBG and LBG) we plan on operating, as we indicated in our application, from the US/Mexican EEZ to the Columbia River for at least half of the year.

We indicated in our application to the Council that we do not want to fish in what we consider the Southern California Bight (SCB), those waters largely east of the Channel Islands and south of Pt. Conception. One of us (Hall) participated as a scientist on the Dept. of the Interior, Bureau of Land Management marine surveys associated with potential offshore energy development in the SCB in the 1970's. During that time the Federal Government defined the SCB as waters south of Pt. Conception and east of and including the Channel Islands from Pt. Conception south to what is now the US/Mexico EEZ. We conducted some limited aerial surveys offshore to include Tanner and Cortez banks but those areas were not considered to be part of the SCB study area by the DOI/BLM.

As part of the EFP application process we reviewed Automatic Identification System (AIS) records for the time period January 2014 through August 2017. AIS is legally required by the US Coast Guard to be installed and operating on all US fishing vessels 65 feet in length or longer and we believe that AIS records provide a

reasonable database for determining the presence and activity of fishing vessels in the waters in and offshore of the SCB. We recognize that fishing vessels smaller than 65 feet are not required to have an AIS system onboard, although many vessels less than 65 feet in length do as a safety measure.

The results of our 2014-2017 AIS records review show that there was a total of 5 fishing vessels in 2014, 9 fishing vessels in 2015, 17 fishing vessels in 2016 and 12 fishing vessels through August 2017 that operated more than about 10 nautical miles west of the Channel Islands. Although the Coast Guard regulations require that the AIS on fishing vessels over 65 feet in length be operational, we understand that some systems fail and some may not be operational for other reasons so the AIS records may not be 100% representative of all fishing vessel traffic.

We believe the AIS records do provide a realistic estimate of fishing vessel traffic in the waters west of the Channel Islands. As a result of our AIS records review, and in order to minimize vessel interactions and potential conflicts, we developed a proposed SCB boundary, along with position coordinates, that would extend from Pt. Arguello south to include the Richardson Rock MPA then southeast to the buoy (Y67) west of San Nicolas Island to the NOAA weather buoy (46086) south of San Clemente Island then to the US/Mexico EEZ. (See attached NOAA Chart 18022). This proposed SCB boundary would be further west and include more area in the SCB than the SCB boundary defined by the Federal government as part of the DOI/BLM offshore energy surveys.

If we are successful in being issued EFP's to use SBG/LBG gear it is our intention to fish only in offshore waters from the US/Mexico EEZ to the Columbia River and not inside (east) of our proposed SCB boundary. We believe this would minimize interactions with other vessels and allow us to provide data on areas that have not been fished to date with SBG/LBG, or have been fished with very limited effort.

We look forward to discussing our proposal with you and the other Council and Agency members at the November PFCM meetings in Garden Grove.

Best regards,

John Hall

John D. Hall, Ph.D.
Coastal & Offshore Pacific Corp.

Attached: NOAA Chart 18022

