



Fwd: DSBG EFP RULE CHANGE RECCOMENDATION

1 message

Chris Fanning - NOAA Federal <chris.fanning@noaa.gov>

Wed, Jun 6, 2018 at 8:32 AM

To: kit.dahl@noaa.gov

Cc: Taylor Debevec - NOAA Affiliate <taylor.debevec@noaa.gov>, lyle.enriquez@noaa.gov

Begin forwarded message:

From: "suzanefish@tds.net" <suzanefish@tds.net>
Date: June 6, 2018 at 8:31:18 AM PDT
To: Chris Fanning - NOAA Federal <chris.fanning@noaa.gov>
Subject: Fwd: DSBG EFP RULE CHANGE RECCOMENDATION

Hi Chris,

Could you please put this in the official comments section.

Thanks.

----- Forwarded Message -----

From: suzanefish@tds.netTo: "pfmc comments" <pfmc.comments@noaa.gov>, "Kit Dahl - NOAA Affiliate" <kit.dahl@noaa.gov>, "Chris Fanning - NOAA Federal" <chris.fanning@noaa.gov>

Sent: Friday, April 27, 2018 9:49:57 AM

Subject: DSBG EFP RULE CHANGE RECCOMENDATION

To the PFMC Council and PFMC Executive Director, Chuck Tracey.

My name is Michael Garin McCarthy,

I am a third generation commercial fisherman who has commercially fished above Pt Conception for the last 26 years. Me and my fellow Northern California fisherman, DSBG EFP applicants Steve Masuda and Eric Masuda have concerns we would like the council to address.

I am writing for us to ask the Council and Director to look at making a recommendation to revise the ten day fishing or non renewal of the 2019 DSBG EFP rule. We would like to ask for a recommendation of 12 days fished for the first three years of the DSBG EFP for fishers primarily targeting Swordfish above PT Conception.

The reason for this request is four fold.

First the ocean weather conditions are dramatically worse above Pt Conception offshore where we will be primarily fishing in our 40' class commercial boats. We will typically see week after week of 25 to 35 knot winds with large seas. We will not be able to fish in those conditions. Evidence to this fact would be clear if the Council or Director looks at the sporadic open access Black Cod landings around the Pt Reyes area.

The second reason is due to the limited time ocean conditions will be primed for targeted species to be present. We are anticipating a six week period when the Swordfish may be within the range of our smaller boats. During these times the opportunity will be largely dictated by ocean state which is primarily unsettled

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at best and down right nasty at most times. Small windows of good weather will be very short.

The third is the lack of mandated observers in Northern California. I am afraid if the weather is good we may not be able to get to go fishing because of lack of observers due to other boats going fishing at the same time that also take observers because of limited good ocean weather periods.

The fourth is our boats are not equipped for this fishery and we are anticipating needing a couple of months to build and outfit the boats with needed gear to engage in the DSBG.

Our counterparts in Southern California enjoy much better sea states than we do up North for much longer duration's giving a much better chance to recognize compliance with the ten day rule before 2019. They also have a broader observer base to choose from. We don't have such luxuries to either.

Making the recommendation I have suggested will lead to a broader base of harvest data points from Northern Boats in addition to Southern Boats

I ask the council to recommend a longer time for the boats fishing the Northern waters to be able to be compliant with the DSBG EFP terms and conditions due to these facts.

If there are any questions or concerns please feel free to contact me.

Thank you.

Michael Garin McCarthy