

----- Forwarded message -----

From: **Bill James** <Halibutbill@live.com>
Date: Thu, Feb 9, 2012 at 11:41 PM
Subject: For Briefing book Open Public Comment C.1 b
To: "pfmc." <pfmc.comments@noaa.gov>

February 9, 2012

Dan Wolford, Chairman
Pacific Fishery Management Council
Re: Open Public Comment

Mr. Chairman and Members of the Council

My name is Bill James and I am a commercial fishermen and a fishery consultant for Port San Luis Commercial Fishermen's Association. Today I am representing PSLCFA in respectfully requesting that the Pacific Fishery Management Council change Section 660.330 Open access fishery---management measures "vessel limits" to "permit holder limits" to allow for more than one California Nearshore permit holder to catch his or her bi-monthly trip limit on the same vessel. There are numerous economic and safety reasons for this request. In 2011 California Nearshore Permit holders landed only apprioximately 50 percent of their "Harvest Guideline" or ACL. Port San Luis along with Morro Bay is a top supplier to the "Live Fish Restaurants and Fish Markets in the San Francisco bay and Los Angeles areas. Advancing age, Numerous MPA's, High fuel costs, increased travel time to fishing grounds becuse of implementation to many No-Take MPA's have kept our nearshore fishermen from catching and landing the rest of their allocated fish. Our group mainly uses a low impact gear (rod and reel) to catch their fish. Please change the management measures to allow for multiple permit holders to fish opn the same vessel.

Sincerely,

Bill James for the Port San Luis Commercial Fishermen's Association

The language

Section 660.330 Open Access fishery----management measures.

(a) General. Groundfish species taken in open access fisheries will be managed with cumulative trip limits (See trip limits in Tables 3 (North)and 3

(South) of this subpart), size limits (see Section 660.60(h)(5)), seasons (See seasons in Table 3 (North) and 3 (South) of this subpart)., gear restrictions (see paragraph (b) of this section), and closed areas (See paragraph (d) of this section and Sections 660.70 through 660.79, subpart C).

(1) Unless otherwise specified, a vessel operating in the open access fishery is subject, and must not exceed any trip limit, frequency limit, and/or size limit for the open access fishery.

(2) In waters south of 42 N. Lat., individual fishermen with a state permit for the take of cabezon, greenling, or nearshore rockfish as defined in Section 660.11 are subject to, and must not exceed any trip limit, frequency limit, and/or size limit for the open access fishery.; Section 660.330(a)(1) does not apply for the take of cabezon, greenling or nearshore rockfish.