

August 2017

To: Dungeness Crab Task Force  
From: Half Moon Bay Seafood Marketing Association



Regarding: [Fish and Game Code 8280](#)

A key issue with transferability of Dungeness Crab Vessel Permits is that the California Department of Fish and Wildlife did not require documented vessel lengths when the permits became limited entry. In other limited entry fisheries, such as those managed by the National Marine Fisheries Service, lengths were assigned to each permit using a consistent measuring mechanism and marine surveys.

In these fisheries an official length or “endorsement” is assigned to each permit. Because this information is readily available, permits can transfer on and off of vessels relatively quickly and easily as long as the vessel the permit is being assigned to is no more than 5 feet longer (length overall) from the permit published length.

From the instructions on the transfer form to transfer a Pacific Coast Groundfish Limited Entry Permit: *“List the length overall of both the current and new vessels. If NMFS does not have a recent marine survey for the vessel on file, the permit or vessel owner must provide recent marine survey (conducted in last 3 years) with the length overall measurement to process the request.”*

We suggest that challenges with Dungeness Crab Vessel Permit transfers could be resolved by setting a date in the future to do what should have been done originally, which is to assign a vessel length/endorsement to each permit.

- The records should be updated in conjunction with permit renewals.
- For a designated year, permit holders would be required to provide a recent survey information to verify permit length with permit renewal.
- Definition of “recent” should be consistent with NMFS language where it is defined as conducted in the last 3 years.
- A clear, consistent and standardized definition of the required measurement must be required and communicated clearly.
- Length Overall is the current measurement requirement, which is defined in the US Coast Guard (§679.2 Definitions) *Length overall (LOA) of a vessel means the centerline longitudinal distance, rounded to the nearest foot, measured between:*
  - (1) The outside foremost part of the vessel visible above the waterline, including bulwarks, but excluding bowsprits and similar fittings or attachments, and*
  - (2) The outside aftermost part of the vessel visible above the waterline, including bulwarks, but excluding rudders, outboard motor brackets, and similar fittings or attachments*

Completion of this process will reset the permit process, and maintain the complexity and diversity of the fleet which is important for our fishing communities.

We further believe that this should be accompanied by a simplified transferability process for commercial fishing businesses (and the Department).

- Permits should be able to be transferred to any vessel up to 5 feet greater in length than the endorsed permit length.
- Permits should also be able to transfer “down” to a smaller vessel without effect on the endorsed length (ie: a permit with a 50 foot endorsement, should be allowed to transfer to a 55 foot vessel, and then to a 40 foot vessel and then back to a 55 foot vessel with no issue).
- We would again suggest following the precedent of NMFS and allowing transfers at will as long as the length and survey requirements are met.

Thank you,  
Half Moon Bay Seafood Marketing Association