



**To:** Renee Ananda – California Coastal Commission

**From:** Lisa Damrosch- Half Moon Bay Seafood Marketing Association

**Re:** CDP Waiver #2-14-1592-W and CDP Waiver # 2-14-1170W

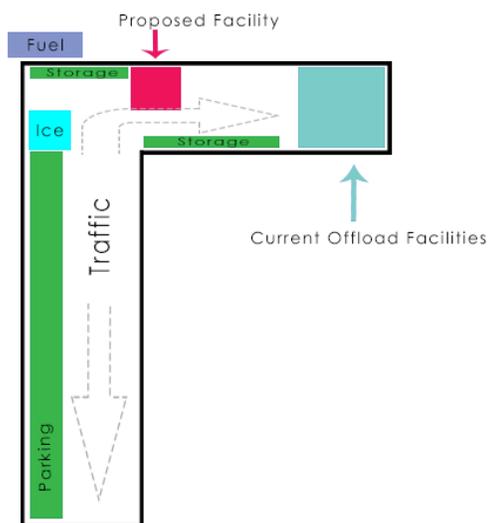
As you know, the members of HMBSMA have expressed concern regarding the waivers of the above referenced Coastal Development Permits. We are particularly concerned about the potential for significant economic loss to our members and others operating businesses at Pillar Point Harbor.

More than 100 commercial fishing vessels and three buying/offloading businesses operate out of Pillar Point Harbor. In 2013, 18.7 million pounds representing \$17.1 million dollars of seafood was unloaded over Johnson Pier.

Johnson Pier is an L shaped pier that is wide enough for approximately 3 vehicles on the East/West span and approximately 2 vehicles on the North/South side. This pier must accommodate the public as well as commercial fishing activity, including offloading, and storage of offloading equipment. Traffic on the pier includes small cars and trucks, foot traffic, forklifts, and semi-trucks.

For the past 30 years, all offloading has been conducted on the northernmost part of the pier as referenced in the drawing to the right. This drawing is for general reference only and is not to scale.

The efficiency of this infrastructure is critical to the financial viability of our fleet. We believe that changes to this infrastructure without adequate study could be economically damaging and potentially reduce offload revenue by up to 20%-30%.



Specifically, the installation of a new hoist in a new location that has not previously supported offloading activity will have an indisputable impact on traffic patterns on the pier and could delay offloads for vessels. There is also a potential for access to fuel and to be impacted which will also result in delays to fishing activity.

For individual fishing vessels, delays at the dock translate directly into lost revenue. Delays are already experienced due to congestion from existing infrastructure, adding to this without a complete process and adequate study could result in even greater delays.

Every hour spent waiting to unload, are hours that cannot be spent fishing. Because fishing activities are weather dependent, extra time at the dock can sometimes result in multiple missed fishing days due to bad weather.

An example, based on Dungeness Crab: in 2013, 2.4 million pounds, representing more than 7.5 million dollars were offloaded over Johnson Pier. A 20%-30% loss in revenue due to delays could equate to 2 million dollars.

It is estimated that close to 70% of the total Dungeness Crab harvested is caught in the first 10 days of the season. Therefore a delay of a single fishing day could result in a loss of close to 10% of the projected total season revenue for a Dungeness Crab fisherman. Depending on the size and capacity of the vessel, losses could amount to \$5,000-\$40,000 per day.

The other fish buying businesses on the pier could also suffer significant economic losses if they cannot adequately move product from the vessels to the trucks, and if trucks cannot get off of the dock in a timely fashion.

Seafood is a perishable product, and Dungeness Crab are also sold live, the timeliness and efficiency of delivery is imperative for the quality of the product and payment to the vessels. (Boats are not paid for dead crab)

Other considerations are the efficient loading and offloading of equipment. During the Dungeness Crab season, 50,000-60,000 traps are loaded on and off of vessels. The inability to load vessels efficiently can further delay fishing activities.

Commercial fishing operations are very complex, and while HMBSMA members are hopeful for infrastructure changes to improve offloading facilities, the implications of any changes require study and careful consideration. Commercial fishermen are participating in a strategic planning process, which is currently underway with the hope that it will help inform these decisions in the future. Meanwhile, we cannot risk the economic loss that could be caused by changes that are not adequately studied.