



September 25, 2014

Mr. Sonke Mastrup
Executive Director
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

RE: Fish & Game Commission Agenda Item 13 A – Experimental Squid Permits

Dear Mr. Mastrup,

On behalf of Del Mar Seafood's Inc., we must respectfully oppose agenda item 13A regarding the proposed issuance of experimental squid permits for a variety of reasons. Although the Commission has the authority to issue these permits under CCR 149.3, we believe that this particular regulation is both unnecessary at this time and disadvantages the current fleet of operators.

It is unclear why the regulation is even necessary given that there are current permits available for sale, so this doesn't appear to be an issue of availability. In addition, this policy would economically disadvantage the current fishing businesses who have invested millions of dollars in their infrastructure, operations and permitting. Additionally, the cost for permits is designed to support the critical enforcement and oversight functions at the Department of Fish and Wildlife. By adding more work to their limited resources without the benefit of additional fees to cover the workload would appear to be bad public policy.

Also, since the catch limits would remain the same, it is only logical that this would negatively affect all the existing commercial fishing operations.

Finally, there doesn't appear to be a timeframe for how long these permits are valid or if they would ever expire. If they are allowed to keep these experimental permits indefinitely, then this creates an inequitable permitting process for the industry and would be counter to the very definition of experimental.

We believe that the Commission's ongoing collaboration with the industry is critical to ensure California's competitiveness in the global market and ensure that California's fishing industry continues to provide critical jobs and revenue to the state.

Thank you for your consideration of our comments and concerns.

Sincerely,

Traci Stevens

Andrew Govenar

Cc: Ms. Susan Ashcraft