



Washington Trollers Association
P.O. Box 2185
Westport WA 98595

Phone/Fax: (360) 648-2414
E-mail: dsaul@centurytel.net

June 11, 2006

Mr. Donald K Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland OR. 97220-1384

Dear Mr. Hansen:

The Washington Trollers Association (WTA) is made up of approximately 100 members and represents the majority of the salmon trollers that troll for salmon off of the Washington coast. The WTA is aware of the requirements of the Magnuson Act and the Court's interpretation of what actions need to happen in order to demonstrate that Yelloweye groundfish are managed on a recovery schedule. The PFMC is required to consider the effects of even the smallest bycatch encounters of Yelloweye in fisheries such as the salmon troll fishery or demonstrate that the PFMC managed fisheries will allow a recovery of Yelloweye groundfish. WTA representatives have met with WDFW staff and discussed ways that the Washington Trollers can help in the recovery of Yelloweye. However, because of a lack of communication, we were totally surprised by the WDFW Report Agenda Item F.2.b that was released in early June 2006. The WDFW report proposes a no fishing zone of a vast area of prime salmon trolling area that we think is not justified as Yelloweye habitat or abundance. The following points are made from our understanding of the science and the interaction of salmon trolling and Yelloweye encounters.


- Yelloweye are very sedimentary and live close to the bottom around high relief rocks.
- Bottom trawlers encounter very few Yelloweye because they trawl primarily in flat bottom and avoid rocky reefs. Especially since large foot ropes and rock hopper gear was eliminated in the last few years. (This regulation change should have dramatic affect to help Yelloweye recover.)
- Salmon trollers seldom encounter Yelloweye because of the difficulty trolling close to the bottom around high rocky relief sites.
- The information on salmon troll encounters with Yelloweye was found by the advisory teams not to be statistically usable. unusable ²⁴⁵
- The Yelloweye protection area proposed by the referenced WDFW Report as a no fishing zone is a high production salmon area that happened to produce most of the salmon trolling opportunity this last month and includes vast areas of flat trawlable terrain that do not include high rocky relief that Yelloweye habitat.

- We have unique rockfish conservation areas designed for each of the major gear types that incidentally encounter rockfish to include longline, trawl, and sport. Salmon troll gear is different and should have unique areas of no salmon troll fishing to protect rockfish as well. It should be reasonably easy for enforcement to determine the difference between vessels trolling with hooks and vessels using other types of gear.
- In the area proposed for "no fishing in 2007-2008 cycle" in the WDFW report referenced above, there has been several observed salmon troll trips in 2005 and 2006. As far as we know, there have been no encounters of Yelloweye while trolling for salmon in the same areas.

Taking the preceding into consideration, and understanding that because of our low encounter rate of Yelloweye in the troll fishery, the models estimating Yelloweye recovery will not be affected by any measures taken by the troll fleet short of completely closing the fishery. WTA is concerned and understands the pressure brought by the environmental community and the courts to do all reasonably possible to ensure that the Yelloweye recovers in the quickest time possible. WTA has reviewed the submersible data from the North Washington Coast and found high abundance of Yelloweye in an area off of Cape Flattery in an area called the "table top" at 48 24' N by 124 53' W. This is in the no trolling area that is commonly called "mushroom closure". Many of our trollers have used other types of gear in past years that targeted Yelloweye and know of several places of good habitat and high abundance of Yelloweye that is protected from trolling in the closed to trolling "mushroom area".

If it is necessary to satisfy the Court Mandate for the recovery of Yelloweye, WTA is forwarding the following alternative for consideration as additional closed to trolling area for 2007-2008. WTA is forwarding for consideration an area bounded by 125 16.5 W, 125 14.0' W, 48 00' N, 48 02' N. This proposed closed area should not be considered for expansion as the submersible data information show this area as extreme high rocky relief with high abundance of Yelloweye and some adjoining areas are flat and not good Yelloweye habitat.

Sincerely,



Doug Fricke, WTA President



STAGNARO

Fishing Trips & Bay Cruises

Santa Cruz, California

PO Box 1340, Santa Cruz, CA 95061

Agenda Item F.2.d
6/06

Pacific Fishery Management Council,

MY NAME IS KEN STAGNARO. I AM FROM STAGNARO SPORTFISHING IN SANTA CRUZ AND MONTEREY BAY AREA. MY FAMILY'S BUSINESS HAS BEEN IN EXISTENCE SINCE THE EARLY 1930'S. OUR FLEET ONCE CONSISTED OF AS MANY AS 14 CHARTER BOATS. IN 2006 ONE BOAT IS ALL THAT IS LEFT. IN A BROADER PICTURE IN THE LATE 1990'S THERE WERE APPROXIMATELY 20 COAST GUARD CERTIFIED COMMERCIAL PASSENGER FISHING BOATS IN MONTEREY BAY. NOW THERE ARE SEVEN! AND ONE OF THOSE IS FOR SALE. IN FACT IM SURE THERE ARE OTHERS WHO WOULD SELL JUST TO KEEP THEIR COLLECTIVE SHIRTS. I OFTEN HAVE A SARCASTIC CHUCKLE WHEN I READ AN ECONOMIC IMPACT REPORT AS TO THE LATEST RESTRICTIONS OR SEASON CLOSURE, ESPECIALLY THE PART THAT SAYS "MAY EFFECT SMALL BUSINESS" THERE IS AN UNDERSTATEMENT.

IT IS A FULL TIME JOB TO KEEP UP ON ALL OF THE STUFF YOU LAW MAKERS AND NUMBER CRUNCHERS CAN COME UP WITH. FOR THE MOMENT I HAVE A FULL TIME JOB. BUT AS I SEE IT IF IT WERE NOT FOR THE CANARY, GOLDEN EYE AND BOCACCIO ROCKFISH WE MIGHT STILL HAVE A 12 MONTH SEASON WITHOUT DEPTH RESTRICTIONS. ALTHOUGH I AM SURE IT CAN BE DIFFERENT IN OTHER AREAS AND ON COMMERCIAL TRAWLERS. BUT ON OUR BOATS CANARY'S AND GOLDEN EYE HAVE ALWAYS BEEN A VERY SMALL PERCENTAGE OF OUR CATCH GOING BACK TO THE 1960'S. ON AVERAGE MAYBE 10% OR LESS. EVEN MUCH LESS FOR GOLDEN EYE. IF THE LAW ALLOWED US A LONGER SEASON AND GREATER DEPTH I AM CERTAIN I CAN ACHIEVE VERY CLOSE TO ZERO PERCENT CANARY AND GOLDEN EYE. FURTHER, I MOSTLY FISH FROM ANO NUEVO TO THE NORTH DOWN TO THE MONTEREY CANYON OFF MOSS LANDING TO THE SOUTH. THE REEF'S AND ROCKFISH HABITAT IN THIS AREA AMOUNT TO APPROXIMATELY 90 SQUARE MILES. APPROXIMATELY 75 SQUARE MILES OF THIS AREA IS DEEPER THAN 120 FEET. AND AFTER HAVING ONLY 15 SQ. MILES TO WORK IN FOR SEVERAL YEARS, THE NEW MPA'S THREATEN TO TAKE EVEN MORE AREA FROM US. IN SHORT OUR INDUSTRY WILL NOT SURVIVE WITHOUT A LONGER SEASON AND DEPTH LIMIT. I ASK THAT THE OPTION WHICH PROVIDES FOR THE MOST LIBERAL OF SEASONS AND DEPTH RESTRICTION BE ADOPTED. THANK YOU,

KEN STAGNARO