

October 28, 2015

To: Pacific Fishery Management Council
Dr. Don McIsaac, Executive Director

Fr: Westport Charterboat Association
Steve Westrick, President

Re: Agenda Item I.9 (2017-2018 Groundfish Management Measures)

Dear Council members,

The Westport Charterboat Association supports the management measures proposed by the Washington Department of Fish & Wildlife to be analyzed over the winter. In addition, we request that a few additional specific measures be included for analysis:

Recreational Groundfish Bag Limits and Sub-limits

New Alt. 5 10 rockfish bag limit including up to 8 black rockfish with status quo lingcod and cabezon sub limits.

Rationale: If there is a need to lower impacts on Black rockfish in 2017 it could be accomplished through a sublimit. Yellowtail rockfish are plentiful and their harvest doesn't need to be constrained below the status quo limit.

Recreational Season Dates

Two new alternatives for Washington Marine Area 2:

Alt. 2(a) Open black rockfish from March 15 to October 15 only (7 months) west of a line drawn between the tips of the Grays Harbor jetties. Status quo Lingcod season dates would remain in effect for Area 2.

Rational: This would constrain the black rockfish season but allow fishing for other rockfish after October 16 and before March 14. Black rockfish would be allowed to be taken inside the jetties. Lingcod would remain status quo.

Alt. 2(b) Same as Alt. 2(a) except open black rockfish from April 1 to September 30 (6 months).

Rationale: a shorter black rockfish season would provide a comparison to Alt. 2(a) for the purpose of analysis.

General statement

We can't support doing anything that could significantly increase impacts on Yelloweye rockfish.

- Reintroducing canary rockfish into the recreational bag limit needs to be done with a high degree of caution because of the potential to exacerbate Yelloweye rockfish mortalities due to misidentification by anglers.
- Increasing the lingcod bag limit could result in increased encounters of Yelloweye.

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

From: **Tim** <reelsteel@humboldt1.com>

Date: Wed, Nov 4, 2015 at 5:59 PM

Subject: Recreational Petrale Sole in California

To: pfmc.comments@noaa.gov

In California's Northern Management Zone Petrale Sole are rarely caught while fishing for rock fish but are caught occasionally by sport anglers fishing for Pacific Halibut or Sand Dabs. The current regulations only allow retention in waters under 20 fathoms. Petrale could be misidentified by anglers fishing for Sand Dabs or Halibut and accidentally retained. Commercial draggers can catch thousands of pounds of Petrale where the sport angler may not keep even one. I would like to request that the depth restriction for sport caught Petrale Sole be removed. Thank you, Tim Klassen Eureka Ca ph [707-499-5509](tel:707-499-5509)



Roger Thomas
President

GOLDEN GATE FISHERMEN'S ASSOCIATION

Statement to PFMC on Groundfish Issues, Item I.9 On behalf of Golden Gate Fishermen's Association (GGFA) Presented by Bob Ingles, GAP Representative, GGFA Board Member

GGFA represents the majority of the Commercial Passenger Fishing Vessels (CPFV) in the State of California from the Oregon border on the north through Monterey Bay on the south.

This fleet carries thousands of passengers to our offshore fishing grounds for all groundfish species.

After many discussions and meetings with members of the Board of Directors, we would like to present the following issues for the Council's consideration in regards to groundfish management options at the November 2015 meeting:

Time on Water: This is self-explanatory. All areas of California need as much opportunity as possible. Any and all management changes should be predicated on maximum time on the water while providing adequate opportunities (enough fish to make it worthwhile).

"Red Light, Green Light" - There is a long-standing "red light" procedure to close fisheries when indicated by the best available science. However, there is no process to reopen a closed fishery in a similar manner such as in cases where it is warranted when new stock assessments indicate stocks are rebuilt. A few cases in point include the widow and petrale sole previously, canary rockfish presently, and future stocks which may soon include bocaccio. A mechanism to adjust a mistake or closure of a fishery is vital to the survival of fishery participants and the economic health of the communities involved. GGFA highly recommends the PFMC expedite establishing a green light process for the benefit of all.

Canary retention: The latest stock assessment declares canary rockfish as being rebuilt, and, unbeknownst until recently, more than likely has been for the past 6 years or so. With no green light to reopen canary retention at present, fisheries are still forced to regulatory discards of a species which should otherwise be allowed. This oversight of a green light has cost countless dollars across the board to all Pacific Coast fisheries and related businesses. The recreational fleet in particular has been hard hit by the lack of retention resulting in huge area and season closures resulting in much economic loss and hardship including loss of jobs. GGFA recommends full retention of canary rockfish as part of the recreational overall daily bag limit of 10 in 2017-18 in all areas of the State.

40 Fathom Depth Restriction or Deeper Depth in the RCA: We strongly recommend opening depth restrictions in the San Francisco Management Area to 40 fathoms. The main reason we were restricted to 20 fathoms previously and now 30 fathoms was primarily to prevent canary bycatch, with a very small yelloweye bycatch also in play. With the canary stock now being rebuilt there is no reason to continue the 30 fathom restriction. Moving out to at least 40 fathoms will really help to take pressure off nearshore stocks, particularly the black rockfish which recently exceeded its harvest guideline but was not declared overfished.

Black Rockfish: Stock assessment is very questionable to say the least. The lack of mature females may be hard to explain in the samplings, but all of our CPFV observers say the fish are getting bigger and more plentiful year after year. Seems like a healthy stock to us. But, nonetheless, moving further offshore should take a great deal of pressure off these and all nearshore stocks.

Misidentification: Another huge and somewhat neglected issue is misidentification of black and large blue rockfish. The last three to four years extremely large blue rockfish have been landed and many people mistake them as black rockfish. This observation has also been expressed to me by several CDFW wardens in addition to observers and anglers.

Lingcod Retention: The VAST majority of our members believed going to a 3 lingcod limit was a mistake. We still do! Two lingcod at 22 inches worked just fine. The extra bycatch and highgrading of fish to get that extra ling is just wrong. We feel that we are over exploiting the lingcod and impacting other species in the attempt to catch the "limit" of lingcod. We believe an increase in the minimum size to 24 inches would result in even more highgrading. Additionally, as the lingcod migrate into the shallows, the bycatch of black rockfish is huge. We were previously worried about the canary rockfish, which we are catching more of all the time, but they are now considered rebuilt. But now the black rockfish are of concern and reside in shallow

water. On calm days the lings go shallower and that's where the black rockfish live. With the lingcod catch approaching very high levels near our harvest guidelines, the choice is clear. Remember, it's all about the fish...not us!

Petrale: The incidental retention of a healthy stock of petrale sole should be allowed, especially by the Pacific Halibut fishery in Northern California where regulatory discards are now mandatory.

Deeper Depths: The Mendocino and Northern California areas have the most restrictive seasons of all of California. While more time is important here, because of weather restrictions deeper depth could be equally important. With the limited use of additional YRCAs deeper depth could be achieved. We must be careful not to let another "oh no" season like 2008 happen again. The marine reserves and YRCAs already in place are already very restrictive in relation to the public's access to the coastline and should be taken into account.

All Depths: Another idea whose time may have come will be proposed: The possibility of a limited time of an "all-depths" fishing season. Again, with the use of strategically placed YRCAs, an all-depths season could be attained. Once again, the economic benefits to the fleet and the supporting communities would be astronomical.

Thank you for your consideration and all your efforts to ensure that high optimal recreational opportunities are established in the fisheries for the benefit of the public and the businesses that depend on its success.