



September 6, 2016

Mr. Herb Pollard, Chair

Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101

Portland, Oregon 97220-1384

Agenda Item B.1 – Comments on Non-Agenda Items

Dear Chair Pollard and Members of the Council,

The Ventura County Commercial Fishermen's Association (VCCFA) has been paying close attention to the **Groundfish Essential Fish Habitat (EFH) and Rockfish Conservation Area (RCA) Amendment ROA that is tentatively scheduled under Agenda Item H.3 at the upcoming November PFMC meeting.**

The VCCFA is writing in opposition to the Oceana proposal. When the existing EFH closures were made, every one was at the table and they all came away with full approval of the closures that were put forward at that time, but now Oceana wants more. The VCCFA would like to ask the Council and other Advisory Bodies to consider the following questions and comments when discussing the Oceana proposal in the near future:

1. These 1000 year-old corals seem to be untouched, is this because no trawling has ever taken place there or because trawlers don't fish in that type of bottom?
2. Are there any trawlers fishing in the area to be closed at this time, if so how many?
3. Are there any trawlers from Pt. Conception to San Diego able to trawl in this area?
4. Are there any markets in that area that can process the volume of fish that trawlers bring in and which port could handle that? As we know, the nearest port that could handle any volume of fish would be above San Francisco, which would be over 400 miles away. Trucking from southern ports is not economical.
5. Looking at the proposed chart it appears Oceana wants to close every square in areas left open in EFH closed area. Why when they have never talked or met with any body that has trawled in that area?
6. Going to the painted cave has nothing to do with trawling, so why is it in the Oceana video?
7. Small rock fish don't live at the bottom in the proposed closure area, they spend time in the upper water column until they reach a larger size, so how could trawling deep hurt them?
8. Is there any guarantee that some areas could be opened later? If so, how much later and if they are reopened then why were they closed in the first place?
9. As Oceana is known for always wanting more, is there a guarantee that Oceana will not want more closures on other gear types, including sport fishing?
10. What is NOAA's policy regarding utilizing Taxpayer owned assets (R/V Shearwater) for a corporate position piece? Does NOAA donate their boat to take people out knowing their agenda is to close commercial fishing? This has been seen before in Monterey Bay with Oceana on the NOAA boat with a load of politicians telling them mistruths of which the politicians have no clue if they are right or wrong. It appears that the use of NOAA vessels implies approval and endorsement of NGO positions. These Oceana/NOAA collaborative expedition videos and press releases (in which, according to a crewman on the boat, all NOAA personnel on board were instructed to wear Oceana t-shirts) are unethical position pieces that are not supported by established scientific methodology and that due to their anecdotal nature they should not be considered scientifically credible in any decision making body.

Thank you for your attention and consideration,

Sincerely,

Jonathan Gonzalez
President – VCCFA

Tim Athens
Vice President – VCCFA