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From: **Rob Kraencke** <[snappyrob@aol.com](mailto:snappyrob@aol.com)>  
Date: Tue, Feb 7, 2017 at 9:27 PM  
Subject: Fwd: RCA boundary 40 ftm  
To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>  
Cc: [joanna.grebel@wildlife.ca.gov](mailto:joanna.grebel@wildlife.ca.gov)

Sorry I missed the 5 PM deadline. The announcement of 2017 fishing regulations from calif DFW reminded me to complete my letter. Ironically the deadline to submit comments is on the same day the regulations were to be published in the federal register.

Rob

**Subject: RCA changes**

The RCA was created over fifteen years ago to rebuild rockfish stocks that were believed to be depleted. A miraculous recovery of fish stocks has taken place and there are only a few species on the list for stock rebuilding, namely cow cod and yelloweye rockfish. Discussions have taken place last year to consider easing of the shoreward RCA boundary. The 2017 trip limits released today will allow for the recreational fishery to have access out to 40 fathoms in the area south of the Mendocino management area. The commercial non trawl limited entry and open access RCA boundary remains at 30 fathoms. I am requesting the council consider an in season adjustment to allow the RCA boundary be extended out to 40 fathoms in the same area, south of 38.57.5. This request is based on the following:

1. Observer coverage data from the period 2010 - 2014 clearly shows that the commercial take of yelloweye rockfish in the Ano Nuevo to 40'10 region is very, very low. 10 - 20 fathoms 33 lbs, >20 fathoms 15 lbs out of a combined 148 trips. The was discard rate of .01, nearly zero.
2. The southern most yelloweye conservation is located at 39 54' latitude, well north of the southern boundary of the Mendocino management area.
3. Commercial fishing in federal waters requires a VMS. The burden of a VMS will further limit the number of commercial participants. All of the 30 to 40 fathom area proposed is in federal waters. A VMS insures strict compliance with the 40 fathom boundary.
4. Commercial fishing has bimonthly trip limits (400 lbs) that would likely be filled with limited fishing days in the two month quota periods. Recreational fishing for all practical purposes has an unlimited fishing bi monthly limit, only restricted by daily bag limits. It could be assumed that less fishing effort would lead to fewer yelloweye encounters.
5. Commercial fishing activity would have some accountability with limited observer coverage. Observer coverage is very likely for one out of the five fishing periods per year on commercial vessels. In contrast, Yelloweye catch reporting is on a voluntary basis in the recreational fishery.

Robert Kraencke