

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

November 5, 2014

Madam Chair and members of the Council:

My name is Forrest Braden, owner operator of the F/V Pisces participating in the limited entry (LE)fixed gear sablefish fishery in the Pt. Conception management area.

Although this is my first time addressing the Pacific Fishery Management Council, I've had exposure to the North Pacific Council and it's processes and appreciate the complexity of managing our nations fisheries.

I'd like to touch on an issue related to trap boats fishing shore-based sablefish IFQ in the Conception (South of 36 degrees) management area.

I'm concerned about the concentration of fixed trap gear this year on the primary grounds the sablefish limited entry (LE) fleet out of Santa Barbara has traditionally fished. I understand that fishing grounds are not proprietary. However, I'm worried that the attributes of the IFQ sablefish fishery allow for a version of a monopoly over other gear groups.

By illustration, during September and October most Santa Barbara LE boats were blocked by trap gear from fishing areas they had previously labored to prospect and develop. Either trap gear was present, or the area had been recently worked over hard by trap lines. (I've included screen shots of AIS vessel tracklines to give a sense for what's happening.) Because IFQ vessels can fish off of tens of thousands of pounds of quota each, with no weekly or bi-monthly restrictions, they can set up shop in an area and rotate through their gear until the quota is filled or there are no more fish left. They may also legally leave gear in the water up to a week which allows them to travel to port and offload while blocking anyone else from setting the area.

Unattended gear adds an additional concern. Because flags marking gear are not always easy to see it's very possible for us to lay over gear without knowing it. We typically hail for other commercial fishing vessels in the vicinity on channel 16 before we set, but if the vessel isn't within VHF radio range, there is no sure way for us to know about their gear. Trap gear is much heavier than longline gear and tangling in it isn't safe. If we tangle we are likely to lose some of our gear which not only costs to replace it, but costs the value of the fish that that gear would have harvested.

I'm also concerned that large, concentrated removals in a short time over a very small geographic area are going to leave local areas of depletion, at least in the short term, but possibly long term. Even if IFQ boats move on, it could be difficult for our grounds to rebound. The pots are fitted with escapement rings that juvenile fish can pass through, but fish big enough to spawn cannot which I fear may be having long term effects on the spawning biomass.

I would like to ask that the shore-based IFQ program be amended so that vessels must remain within radio contact of their gear and/or retrieve their gear before leaving an area. I'll be looking forward to the opportunity to elaborate on the potential for negative impact the IFQ fleet has on limited entry and other sectors.

Respectfully,

Forrest Braden
F/V Pisces

Pt. Sal to Santa Cruz Island x Map Results | Wind, Forec... x Southern California - Surf x Live Ships Map - AIS - Ves x

https://www.marinetraffic.com

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MarineTraffic Live Map Vessels Ports Photos Participate Services Vessel/Port Sign in

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10/28/14
Same vessel

N34°18'17.55"
W120°53'36.75"
(34.3049, -120.8936)

101

Remove Ads

San Miguel Island

Santa Rosa Island

Track Options

Taxes!!!
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