



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Agenda Item E.3.b
NMS Letter
November 2011

August 24, 2011

Mr. Mark Cedergreen
Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Mr. Chairman,

As the superintendents for Cordell Bank and Gulf of the Farallones National Marine Sanctuaries, we would like to express support for the Exempted Fishing Permit (EFP) for shelf rockfish proposed by the San Francisco Fishermen's Cooperative. In addition, the Cordell Bank Sanctuary Advisory Council supported the activity if monitored by observers and data analysis was conducted by fishery scientists. This EFP would allow local fishermen to test a selective vertical-gear fishing technique and implement a monitoring program to collect fisheries data from the catch. The proposed method will target populations of mid-water rockfishes, and it's expected that this fishing method will have minimal impact on the sensitive reef top habitat at Cordell Bank, seabirds, turtles and recovering rockfish populations protected by the Rockfish Conservation Area. Scientists from National Marine Fisheries Service have developed the research plan that will implement the by-catch caps established by the Groundfish Management Team for overfished species.

The sanctuary also supports elements of the EFP that promote the local, small boat fishery, the use of low impact gear, sustainable fishing practices and the potential for economic development in local ports and coastal communities. The submission of this EFP is one of several activities proposed to support the San Francisco Fishermen's Cooperative. The vision for this group is to develop a community owned and integrated seafood business that ensures the economic viability of the area's fleet of family owned fisheries operations. If harvest using this EFP method is viable, it would provide the fishermen's cooperative with one more high quality product, allowing them to supply sustainably caught seafood into local markets.

If the proposed fishing activity proves to be "clean", this is the type of sustainable fishing that should be promoted. Cordell Bank and Gulf of the Farallones National Marine Sanctuaries support this EFP to determine if midwater rockfishes can be sustainably harvested with vertical hook and line.

Sincerely,

Dan Howard
Superintendent
Cordell Bank National Marine Sanctuary

Maria Brown
Superintendent
Gulf of the Farallones National Marine Sanctuary

Barbara, this letter is responding to a question you posed – Is it necessary to fish in the Rockfish Conservation Area (RCA) to target yellowtail rockfish (*Sebastes flavidus*)? My understanding is that the current non-trawl RCA closure prohibits fishing between 30 and 150 fathoms in California. Love et al. (2002) say that yellowtail adults are most abundant between 45 and 90 fathoms which puts the center of the adult yellowtail distribution within the depth range closed by the non-trawl RCA. In addition, adults usually are found over high relief, such as boulders and sheer rock walls, most often swimming well off bottom, sometimes in schools of thousands (Love et al 2002). This accurately reflects what we have observed over Cordell Bank. We often observe yellowtail schooling with widow rockfish (*S. entomelas*), so if widows are still a species of concern this would be problematic. We rarely see canary rockfish (*S. pinniger*) schooling with yellowtail though their published depth range from NMFS trawl surveys (40-100 fathoms) overlaps with yellowtail (Love 2002). On Cordell Bank, we more often observe canary rockfish in deeper water and in closer proximity to the bottom. Because yellowtail are schooling in mid-water well off bottom, I think the chances of catching species of concern like yelloweye (*S. ruberrimus*) and canary are minimal. But it's this kind of information that we are hoping your data will help address. I hope this answers your question. Dan

Love, M.S., M. Yoklavich, and L. Thorsteinson. 2002. The Rockfishes of the Northeast Pacific. University of California Press.