

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

From: **rich merc** <2richlol@gmail.com>
Date: Wed, May 14, 2014 at 10:52 PM
Subject: 2015 rockfish season
To: pfmc.comments@noaa.gov

i support rockfishing in 2015 from April 1st through September 30th (40 fathoms) and October 1st to December 31st(50 fathoms). We also support a three bag limit for lingcod.

thanks,
richard mercurio

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

From: **Cookiemn58@GMail.com** <cookiemn58@gmail.com>
Date: Wed, May 14, 2014 at 9:52 AM
Subject: Rock Fish 2015
To: pfmc.comments@noaa.gov

Rock fishing in 2015 from April 1st through September 30th (20 fathoms) and October 1st to December 31st (30 fathoms), also support a three bag limit for lingcod.

Thank you..

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

From: **Bill James** <Halibutbill@live.com>
Date: Thu, May 22, 2014 at 11:54 PM
Subject: F.7 Fisheries 2015-2016 Harvest Spec and management measures
To: "pfmc." <pfmc.comments@noaa.gov>
Cc: Bill James <Halibutbill@live.com>

Madame Chair members of the Council: For the record my name is Bill James. I am the fishery consultant for Port San Luis Commercial Fishermen's Association in Avila Beach California. For the years of 2015-2016 we request the Council to raise the commercial bi-monthly trip limits for both Shallow Nearshore Species and Deeper Nearshore species to 1000 pounds per two month period for the entire year.

south of 40:10. Equal monthly trip limits in each period makes for a consistent catch and ease of remembering the limit for fishing. In the past years Commercial Nearshore Fishermen have not attained the ACL. Higher trip limits are necessary to take advantage of good weather conditions to make up for some of the rough weather conditions we have been experiencing in the last several years. Our fishing vessels are typically smaller vessels averaging around 24 feet in length.

Also please open lingcod in the months that Nearshore Species can be caught. Also, if possible please raise the monthly limit on lingcod.

Thank you, Bill James

April 28, 2014 RECEIVED

Dear Dr. Donald Mc Isaac,

MAY 01 2014

For over a decade the shelf rockfish PFMG quota for non-trawl open access has been the same for me along the south coast of Big Sur (200-300 lbs/2mo.)

I am writing this letter in the hope that you can raise this quota to at least that enjoyed by those south of Pt. Conception, (750-1000 lbs/2mo.) We have an abundance of fish in my area and all the fish I catch goes to local markets.

Also, I hope you can change the fish area from 30 fathoms out to 40 fathoms as it is for sport fishing. At this time, a sport fisherman can catch as much fish in a week for himself as I can in two months

for the local people.

Thank you for your consideration.

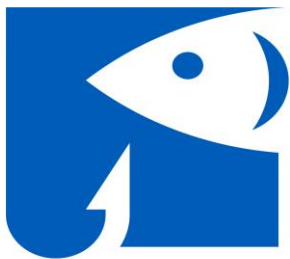
Sincerely yours,

Brett Hurley

427 Montebello Oaks Dr.
Paso Robles, Ca.

93446

Ph. 805-226-8307



Humboldt Area Saltwater Anglers Inc.

P.O. Box 6191, Eureka, CA 95502

Phone: (707) 444-3918 Cell (707) 834-4100

Email: hasa6191@gmail.com

FEIN #61-1575751

May 13, 2014

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

RE: 2015-2016 rockfish seasons, Agenda Item F.7

Dear Chair Lowman and Council Members:

The Humboldt Area Saltwater Anglers, Inc. (HASA) have discussed the Preferred Preliminary Alternatives set forth by the Council regarding the 2015/2016 rockfish seasons. Our organization and its members prefer to allow recreational fishing opportunity from April 1st through September 30th (20 fathoms) and October 1st to December 31st (30 fathoms). We also support a three bag limit for lingcod.

Part of our mission statement with HASA is to maintain angling opportunities, and a primary effort that HASA has conducted over the years is to educate the public on reducing the yelloweye bycatch allocation for our area by expressing the importance of rockfish descending devices. HASA has provided over 300 of the devices to sportfishers free of charge to help reduce yelloweye mortality, as well as other species. We are currently in the process of purchasing more of these devices to distribute to our sportfishers in the areas of Shelter Cove, CA to Trinidad, CA, and continue our efforts to educate the public and reduce yelloweye bycatch and mortality.

We appreciate the opportunity for providing public input on this matter, and do not hesitate to contact me if you would like any additional information.

Sincerely,

Cliff Hart, President
Humboldt Area Saltwater Anglers, Inc.

RECEIVED

MAY 15 2014

Mark Seefeldt

62415 HWY 1
Big Sur, CA 93920

831-667-2404

seefeldt@ymail.com

PFMC

May 10th, 2014

Pacific Fishery Management Council
7700 N.E. Ambassador Place, Suite 101
Portland, OR 97220-1384

Dr. Don McIsaac,

I fish commercially with an open access license along the Big Sur coast in Central California (40°10' N. lat. - 34°27' N. lat.) I launch a 12' aluminum skiff from the beach at Mill Creek (port 516) and Big Creek (port 515). I've been fishing from these ports both sport and commercially for 25 years.

Because of the much needed management of the Minor Shelf rock fish, vermillion, lingcod, and bocaccio populations have increased dramatically. For this reason I write to you in hope that you'll consider modestly increasing the trip limits for vermillion to 400lbs/2mos and bocaccio to 300lbs/2mos through the open season. The lingcod population has improved and the current limits are working well for us and the fish.

Another issue I'd like to address is our depth limit. For over 100 miles from Carmel to Cambria there isn't a pier or harbor and the only method of commercially fishing is to launch a small skiff from shore. As far as I've seen, there are five other fisherman along this coast who are fishing by this method. Because of this, the 30 fathom depth limit is confining and makes my small fishing business nearly unviable because of the conditions (wind, swell, distance) I must travel through to reach the 150 fathom depth limit. Increasing the inner limit to 40 fathoms and decreasing the outer limits to 110 fathoms would help us tremendously as it would enable us to safely fish a more accessible area.

Please feel free to give me a call or email if you'd like to discuss further details about fishing on the Big Sur coast. Thank you for your time and consideration in this matter,

Sincerely,



Mark Seefeldt

David Seefeldt

62415 HWY 1
Big Sur, CA 93920

831-667-2404

David.Seefeldt@yahoo.com

RECEIVED

MAY 23 2014

PFMC

May 10th, 2014

Pacific Fishery Management Council
7700 N.E. Ambassador Place, Suite 101
Portland, OR 97220-1384

Ms. Kelly Ames

I write you in regard to fishing on the Big Sur coast (40°10' N. lat. - 34°27' N. lat.). I've been fishing sport for 14 years and currently fish commercially with an open access license. I fish a small skiff by myself and sell to our local markets.

On the Big Sur coast I have noticed a large population increase over the past decade in the following species: vermillion, lingcod, and bocaccio. For this reason I'm inquiring into the possibility of larger trip limits such as those south of Pt. Conception (750-1000lbs/2 months) or something more than our current 200-300lbs/2 months and 100-200lbs/ 2 months for bocaccio.

I'd also like to request that a change in our depth limits be considered as well, from the inner 30 fathom limit to 40 fathoms, and from outer 150 fathom limit to 125 fathoms.

Your consideration in this matter is greatly appreciated.

Sincerely,



David Seefeldt

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

May 22, 2014

**RE: RETAIN ROUGHEYE ROCKFISH IN MINOR SLOPE COMPLEX AND ALLOW
INDUSTRY TO USE VOLUNTARY MEASURES TO REDUCE CATCHES**

Dear Chair Lowman,

Please accept these comments on behalf of Midwater Trawlers Cooperative, United Catcher Boats, Fishermen's Marketing Association, West Coast Seafood Processors Association, Fishing Vessel Owners Association, Pacific Whiting Conservation Cooperative, Oregon Trawl Commission, Point Conception Groundfishermen's Association, and the Coos Bay Trawlers Association. Collectively, we represent the majority of at-sea and shoreside whiting harvesters and processors as well as a major portion of traditional bottom trawlers, shoreside seafood processors, and members of the fixed gear fleet utilizing long line gear.

We submitted a written public comment at the April 2014 PFMC meeting detailing industry-wide efforts to develop and promote a unified position to retain roughey rockfish in the minor slope complex and to further allow the industry to use voluntary measures to reduce their roughey catches. Several members of the industry also traveled to Vancouver, Washington to provide compelling oral testimony supporting this recommendation.

The Council voiced support for our efforts and our recommended approach by adopting a Preliminary Preferred Alternative (PPA) to maintain roughey rockfish within the minor slope complex along with a mandatory scientific sorting requirement for management in 2015-2016. Our coalition fully supports the PPA and has done additional work to notify and educate affected industry members about this important topic.

This comment reiterates and expands upon why retaining roughey in the minor slope complex while using voluntary measures to reduce catch, is most appropriate. It also summarizes the additional industry-led activities that have taken place since the April PFMC meeting.

Retain Rougheye Rockfish in the Minor Slope Complex

In September 2013, after consideration of several different data sets the Council decided to defer further consideration of reorganizing the minor slope complex until the next management specifications cycle. National Marine Fisheries Service (NMFS) was not fully comfortable with this recommendation and asked the Council to reconsider the issue in 2014 when NMFS offered to provide additional information for Council consideration. In April 2014, after considering additional analysis from NMFS and the Groundfish Management Team, as well as advisory body and stakeholder input, the Council once again had a robust discussion about the issue and determined that retaining rougheye rockfish in the slope complex was the preferred alternative for management. The Council further supported the concept that the industry should be allowed to use voluntary measures to reduce their rougheye catches. The Council will take final action on this issue at the June PFMC meeting.

The affected industry continues to support the Council's PPA and we encourage the Council to review our detailed comment from April 2014 in support of this position. The Council heard through various advisory body and public comments that there is no conservation concern identified and/or demonstrated with rougheye rockfish and that removing rougheye and shortraker from the complex and creating a new complex is both costly and disruptive. There are limited Council, NMFS, and state resources available to conduct the rulemaking that would be necessary to make changes – particularly if there is a need to allocate this species among sectors or individual vessels. At best this will lead to a disincentive for the fleets to work together to voluntarily reduce catch and at worst it will pit the sectors against each other, which benefits no one. With no conservation concern at present it seems most reasonable and wise to follow a path already laid by industry.

The Council and industry have been proactive on this issue. The burden on the Council and NMFS is to ensure that overfishing is not occurring now or will not occur in the near future. This has been done. The Council prioritized a full stock assessment for rougheye rockfish and the results were that the stock is healthy at 47% of its unfished biomass. Further, modeling demonstrates that even at catch levels projected to be higher than the proposed ABC, the stock will continue to grow over the next several years. The SSC approved this assessment for use in management as the best available science.

Allow the Industry to Use Voluntary Measures to Reduce Catches

The industry has made a concerted effort to work collaboratively in developing solutions that reduce impacts on rougheye rockfish -- solutions that did not and will not require an Environmental Impact Statement to implement, solutions that are in use and effective today. A critical first step was to gain an understanding of where, when, and how the industry encounters rougheye. The whiting sectors currently use tools to track catch tow-by-tow and species-by-species; therefore information was readily available to this sector. Because of limitations in how non-whiting landings are reported to the fleet on fish tickets and in PacFIN, non-whiting trawlers

and the fixed gear fleet are working with shoreside processors to develop tools to better understand and react to their species-specific impacts, which include requesting information from their observers, port samplers, or processing plants on how much of their catch contains rougheye rockfish. The Council heard about these measures in April when many of us reported on what steps we had already taken to address this issue.

Since the April 2014 Council meeting several industry activities have occurred. We met again as an industry-wide group in May to discuss the April decisions and plan for the June meeting (Attachment 1). In addition, each sector shared more detail on what they had done and are doing to raise awareness about the issue and to document steps being taken to address catch levels. Lastly, on behalf of the industry coalition, MTC reached out to the state of Oregon for assistance in developing an informational flyer that can be used by any sector for outreach and educational purposes. This flyer will also be placed in gear stores and distributed to seafood processors in an attempt to reach industry members who are not represented by formal organizations.

In preparation for the May industry meeting we sought information on what the catch of rougheye rockfish has been so far in 2014. Unfortunately there was not a lot of information available, as some of the states had not provided updated information to the PacFIN database since March. In the future, the Council's recommended scientific sorting requirement and industry-led efforts to better track species-specific catch by coordination amongst processors, harvesters, observers, and port samplers will likely lead to improved data availability to managers and industry.

Below is a summary of the activities each affected sector has taken to address this issue.

Fixed-Gear

The Fishing Vessel Owners Association (FVOA) notified fixed gear-endorsed-limited entry permit holders about the issue, which included outreach to non-FVOA member fishermen. FVOA Manager Bob Alverson sent a letter to all fixed gear endorsed permit holders to inform them about the issue and the need to reduce both direct and incidental catches of rougheye (Attachment 2).

Traditional Bottom Trawl

The Oregon Trawl Commission (OTC) used its newsletter to notify all Oregon-based trawl permit holders. This newsletter is also available on the OTC's website at <http://www.ortrawl.org/wp-content/uploads/2014/05/Wheelhouse-Spring-2014.pdf>. In addition, the issue was discussed at the May OTC meeting held in Astoria. Many traditional trawlers have been connecting with their observers, port samplers, and processing plants in an effort to determine their past and current catches. Trawl representatives from the Council's Groundfish Advisory Panel have

also been spreading information through word of mouth on the issue and the need to be aware and reduce catches.

Whiting

The whiting sectors have taken a number of steps to address this issue in addition to the information sharing that goes on between organizations and their members.

The *catcher processor cooperative* Board reviewed past roughey catch information and identified areas of high roughey catch occurrence. They agreed to several measures, including:

- Carry flexible grate rockfish excluders for use when fishing in known roughey bycatch areas to minimize roughey bycatch.
- Collect and record tow-specific roughey rockfish amounts (numbers and total weight) that are reported to the PWCC Executive Director.
- Establish roughey rockfish kg/mt of hake rate that triggers action to prevent subsequent tows from exceeding the trigger.
- Establish policy whereby the PWCC Executive Director and Board track daily catches and will consider further actions as warranted.

The *mothership sector* also took action through its cooperative. The mothership bycatch committee as well as the Board met and adopted the following protocols:

- Distribute maps of historic Roughey bycatch to the members
- Distribute high bycatch tow alerts and VMS tracks for hauls exceeding a specified rate
- Establish a set of “relocation” triggers based on a 3-day rolling average exceeding a certain rate
- Additionally, Mothership operators will incorporate Roughey information in the daily ship reports.

The *shoreside whiting* sector’s risk pool also discussed the issue through its bycatch committee and then through the cooperative’s Board of Directors. The group encouraged vessel captains to use Sea State’s “Preliminary Fish Ticket Entry” form to report the plant tally of roughey after each landing, to help provide more real time information on roughey encounters. Sea State will then use the information to produce alerts and VMS trackline maps. Individual shoreside whiting vessel owners (both risk pool members and non-members) have invested hundreds of thousands of dollars into the development of rockfish excluders to reduce the take of non-target species – this development will continue.

Seafood Processors

The West Coast Seafood Processors Association notified its members of the issue and the likelihood of a mandatory scientific reporting requirement beginning in 2015 (Attachment 3). WCSPA also asked that the plants begin sorting roughey and shortraker now and further to share that information back with vessel captains.

Conclusion

The undersigned organizations represent a majority of the industry affected by changes to rougheye rockfish management. We take this issue very seriously. We are actively reaching out and educating our respective fleets about the importance of reducing our catch of rougheye rockfish. We have summarized these activities here in this public comment. More detailed oral testimony will be provided by each sector during the June PFMC meeting.

We continue to support retaining rougheye rockfish in the minor slope complex and strongly recommend that the Council adopt the PPA from April as the Final Preferred Alternative in June. Based on the sum of the evidence the stock is healthy and industry collaboration is proving effective. Therefore, the PPA is both reasonable and justified. Finally, we remind the Council that past voluntary efforts to reduce catches on other species have worked. Moreover, we have successfully demonstrated that we have the ability to effectively share information through our existing infrastructures and to work together across sectors and fleets to achieve favorable results.

Thank you for your consideration.

Heather Mann, Midwater Trawlers Cooperative
Brent Paine, United Catcher Boats
Brad Pettinger, Oregon Trawl Commission
Bob Alverson, Fishing Vessel Owners Association
Pete Leipzig, Fishermen's Marketing Association
Steve Bodnar, Coos Bay Trawlers Association
Gerry Richter, Point Conception Groundfishermen's Association
Dan Waldeck, Pacific Whiting Conservation Cooperative
Rod Moore, West Coast Seafood Processors Association

PFMC / West Coast Rougheye Rockfish Issue
Industry Meeting – Proposed Agenda
Tuesday, May 20th
3pm

In person at United Catcher Boats (Seattle) and Midwater Trawlers Cooperative (Newport) offices or by conference call

1. Welcome and Introductions
2. Review of April PFMC recommendations & scheduled June Decisions
 - a. PPA to retain rougheye in the minor slope complex with a mandatory sorting requirement beginning in 2015
 - b. Allow industry to use voluntary measures to reduce rougheye catches
 - c. Take mandatory use of rockfish excluders off the table
 - d. Some discussion about recategorizing the stock assessment
 - e. FPA in June
 - i. Additional analysis on removing rougheye and shortraker to own complex with an OFL, ABC and ACL
 - ii. NMFS / Council wants to hear more detail on what the fleet is doing to address the problem
3. Review any new landings data that is available
4. Industry response to April decisions / actions
 - a. Fixed gear
 - b. Bottom trawl
 - c. Whiting
 - i. Catcher / processors
 - ii. Motherships
 - iii. Shoreside
 - d. Shoreside seafood processors
5. Joint public comment for June
6. Other?

Adjourn

Attachment 2

May 21, 2014

Notice to Fixed-Gear Permit Holders

Dear Fixed-Gear Fishermen:

This notice is directed to those that fish off of Washington, Oregon, and California with fixed-gear, primarily hook-and-line gear. The National Marine Fisheries Service has notified the Pacific Council and the commercial fishing industry that they are concerned about the harvest levels of Rougheye and Shortraker Rockfish from all fishing sectors. Based on a recent (and the first formal) stock assessment, NMFS is concerned that the Over Fishing Level (OFL) prescribed by the assessment would have been exceeded in recent years had it had been in place. NMFS and the Council have asked the industry to voluntarily reduce their catches of rougheye rockfish in order to avoid more draconian mandatory measures such as restrictive trip limits and closed areas.

Even though there has been a bi-monthly trip limit of 4000 lbs. for these fish, NMFS is concerned that the collective harvest by all fleets on the West Coast may be exceeding what is provided for under the Magnuson-Steven's Act. **You are therefore asked that, to the extent that you can, please do not target rougheye rockfish and avoid the incidental catch of Shortraker and Rougheye Rockfish if at all possible. The Council could push the RCA line out to 200 fathoms if longliners don't help out on this.** Please find an historical catch by all gear groups on the back side of this sheet.

There is a coast-wide attempt by the different gear groups to reduce their catch of these two species during 2014. Currently NMFS and the Council have taken preliminary action to allow the industry to voluntarily reduce their catches. If industry can reduce their catches, it will greatly reduce the chances that any extraordinary restrictions from the NMFS or the Pacific Council will be implemented. This letter is being sent out as an industry effort to notify people of the problem and coordinated with efforts with other affected industry members such as the bottom trawl and whiting fleets.

Sincerely,

Robert D. Alverson
Manager

Attachment 3

West Coast Seafood Processors Association

Week in Review

April 11, 2014

IMPORTANT NOTE

The Council summary contains several important items on the last page that all members should read. If you have any questions, please contact Rod.

PACIFIC FISHERY MANAGEMENT COUNCIL SUMMARY

The complete list of Council actions will be available on the Council's web site early next week (<http://www.pcouncil.org>). Shown below are issues that we believe are especially important to our members.

****ROUGHEYE ROCKFISH** – The good news is that the Council did not create a separate stock complex for rougheye / shortraker / blackspotted rockfish, nor is it discussing rougheye excluders. The Council did ask the Groundfish Management Team to analyze two additional seaward RCA lines – 300 fathoms and 350 fathoms – in case some sort of closure is needed. The Council will also look at identifying discrete temporary closure areas north of 40°10' in the event they are needed. However, ALL OF THIS IS CONTINGENT ON THE INDUSTRY FOLLOWING THROUGH ON VOLUNTARY AVOIDANCE PLANS. Industry groups will be getting together in the near future to work through options for keeping rougheye catch low and we will be following up with you. One thing you should begin to do right now is sort out rougheye rockfish at the dock. This will be required starting in 2015 but it will be good to get in practice and train your dock crews how to do it. If one of your boats has large catches of rougheye, warn them about it and ask them to change their strategy or fishing location if possible. This applies to all fishing sectors: whiting, trawl, fixed gear, and open access. Educate your boats on the need to avoid rougheye when fishing for slope rockfish in the north. It is not illegal to catch them but if too many come in we will be facing management actions that will not be pleasant. If you have any questions, please contact Rod.