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:

My name is Dick Woolsey. I am a recreational sports fisherman that fishes out of Eureka, California. The fish stocks along the Northern California coast have rebounded nicely due to the restrictive measures that have been put in place to protect overfished species. Recent surveys and catch data have shown that our fishery is now quite healthy. We are the most heavily regulated area in the state and take into consideration weather conditions along the north coast, we do not get a lot of opportunity to fish and therefore there is no reason not to expand our season. My preference for the 2015-2016 sports rockfish season would allow recreational fishing from April 1st through September 30th (20 fathoms) and October 1st to December 31st (30 fathoms). I also support a three bag limit for lingcod.

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

Sincerely,
Dick Woolsey
Hi,

I am writing this letter in support of increasing our recreational time for fishing through December 31st. Also, I support the 3 bag limit for lingcod.

Thank you so much for considering our request for a longer ground fish season up here on the North Coast. Our area depends on our fishing industry and the increased time will bring more tourist dollars into our community. We are very concerned about fish in general and treasure this resource that we want to see last for generations. We are doing our own research and data gathering in this area. There is an abundance of groundfish and with our ocean conditions limiting our ability to fish, the extra days and depth won’t have a negative impact on the fish.

And..... It is not the recreational fisherman who is doing the damage. Last year I saw hundreds of small yellow fish floating out in the ocean that had been dumped by some trawler. I got a photo of the fish, but not the trawler. That dump upset the fleet. The fish were scattered over a one mile area and it was awful. The small time fisher folks use caution and release devices to help save the fish that we are not to keep. None of us want to deplete a fish stock and we respect the limits that are set. We are asking that you review our ocean conditions and days we are able to fish by our own standards.

I am sorry if this isn’t the type of letter you were looking for, but it is one I felt compelled to write and send. Please do all you can to give us the longer season. Thank you!

Pamlyn Millsap
Chair Lowman and Council Members,

My husband and I attended the April Council meeting in Vancouver in hopes of testifying against possible closures of both Kelp Greenling and Near Shore Species. Unfortunately, the Council was running so late that we did not get the opportunity to do so. Because of a mistake in the SSC science for the Kelp Greenling the closures will not happen, I assume, unless better scientific data is brought forward. Now, we find ourselves in the same position with the same arguments for the nearshore complex. Reductions in this completely untargeted fishery seem to be imminent, based only on catch data. Charter boats and recreational fishermen will also again be asked to take a hit for the near shore fisheries species that have catch data only and no "real" science to base this important managing decision upon.

Let's visit the real world for a minute. I don't know how it works in other area's, but I would like to explain to you when and why charter boats and recreational fishermen in Garibaldi catch so few Blue Rockfish. Except for two or three weeks in August, there is such an abundance of Black Rockfish that we are unable to get the hooks and weights down through them to catch anything else. By mid-August the Blacks are evidently so full of bait that they couldn't eat another thing if they had to, much less be attracted by anything the fishermen might have to offer. Then, we do start to catch a few Blues though we'd rather not as they are too small to satisfy our customers or most recreational fisherman. We are in a "Catch 22" situation here where scientists are saying, with little real science or assessments to back up their "assumptions," that if we catch more fish, the stock is in danger of being overfished and if we catch less, then the stock must be in trouble! To the fishermen, of course, you usually catch more fish because there are more of
them down there than usual, and if you catch less of them, it's time to try somewhere else. Catch data alone simply cannot be used to designate a problem with any species. The fishermen have agreed to work with fishery managers using real stock assessments to identify and protect species that are in danger of being overfished, but they did not agree to being managed by assumptions and a lack of data or "data poor" assessments.

We understand that ODFW has several other measurements about the Near Shore species that NMFS isn't using to help determine their stock status and health. The ODFW created a Nearshore Plan several years ago. Many Oregon fishermen support a request by Oregon and Washington Depts. of Fish and Wildlife to remove these small, near shore fisheries from federal management and turn it over to the states. Both states have a proven track record in managing species for the benefit of all, even the fishermen. Turning this responsibility over to the state agencies would benefit the Council and NMFS who appear to not have the time or money to do proper assessments for the smaller fisheries. Oregon and Washington both have the science available and the expertise to manage them. At the very least, NMFS could be instructed to use (and help pay for) the science that has already been done by the states.

Unnecessary reductions in quota for the Nearshore Rockfish Complex, especially when one species at a time is taken out, can do real economic harm. Charter boats in Oregon have approximately six months in which to make a living that must last all year. Many mistakes have been made with the "data poor" and "data moderate" standards, and we would like to request that the Council correct them before any unwarranted actions are taken that can literally destroy so many fishermen's livelihoods. Economic problems would multiply many times over for all our Coastal Communities if our charter and recreational fleets were shut down or seasons shortened. There would be far reaching consequences to our tourism businesses and trades as well if any of our fisheries are shut down or our seasons shortened. This applies to our commercial fisheries as well. While deliberating this issue, we hope the Council takes into account National Standard #8 of the MSA to "Consider fishing communities to provide for their sustained participation and to minimize adverse impacts". We would also like to remind NMFS again that while Oceana and other NGO's often threaten lawsuits for their numerous fishery "crisis" management schemes, NMFS could just as easily be sued for major, unwarranted economic impacts to the fishing fleets and coastal communities.

Thank you,

Mick and Linda Buell
Garibaldi Charters, Garibaldi, Oregon
June 13, 2014

Pacific Fishery Management Council
7700 NE Ambassador Place, STE 101
Portland, OR 97220
Dorothy Lowman, Chair

Re: F.7.c, public comment / Near shore Rockfish management

Dear Ms. Lowman and Council members

The aforementioned Washington ocean recreational fishery groups support the current management system for nearshore Rockfish off the Washington coast for 2015-16.

Washington has a different near shore management approach than Oregon and California. This has led to significant differences in catch histories for all nearshore stocks, including nearshore rockfish, cabezon, and kelp greenling.

When salmon began to decline in the late 1970s Washington charter boats and recreational fishermen diversified their target strategies to other species in order to stay viable. The commercial hook and line fishery was very small and many, if not most, were charter boat operators trying to survive. The primary target was Black Rockfish as it is today.

Over time, working with WDFW, we supported reductions in Rockfish bag limits to avoid localized depletion and maintain a sustainable fishery. WDFW reduced the rockfish bag limit from 15 to 12 in 1992, closed the commercial nearshore fishery in 1995, and reduced the rockfish bag limit again from 12 to 10 in 1996.

Washington closed its commercial fishery almost 20 years ago. It does not make sense to use Oregon’s recreational CPUE, which competes with an Oregon commercial fishery, to determine the status of nearshore stocks off Washington. Further, given these proactive, conservative measures and the sustainable level of harvest that has occurred off Washington for
the last 60-70 years, it is difficult to comprehend and explain why we should have to do anything at all to constrain our recreational fisheries on these stocks.

Although occasionally encountered, nearshore rockfish, cabezon, and kelp greenling are not targeted species. While “non retention” seems like it wouldn't cause any harm, we question why an angler shouldn't be able to keep those incidentally caught fish when the stock is “healthy” (i.e., above B40%)?

Our industry has been responsible and pro-active with regard to conservation and management measures to assure the sustainable use of our fishery resource.

Once again, we urge you to set allowable harvests and craft management measures for 2015-16 that maintain our current closely monitored fishery.

Respectfully yours,

Mark Cedergreen
Executive Director
Westport Charterboat Association
PO Box 654
Westport, WA 98595
PFMC GAP member

Butch Smith, Ilwaco Charter Association
PFMC SAS member, chair

Steve Watrous, Columbia Pacific Anglers
PFMC SAS member

Gary Grahn, Olympic Anglers
Lapush / City of Forks recreational fishery advisor

Tom Burlingame, Excel Fishing Charters
Neah Bay recreational fishery advisor

Kevin Lanier, Vice President, Puget Sound Anglers
Coastal recreational representative

Dave Seiler
PFMC GAP, Washington recreational advisor