



Coastside Fishing Club  
P.O. Box 5928, Napa, CA 94581

Agenda Item H.10.c  
Public Comment  
November 2013

7 October, 2013

Re Agenda Item H10: Requests for Groundfish regulation analysis

The Coastside Fishing Club is an all-volunteer California non-profit organization of 13,000 recreational fishermen dedicated to enhancing the recreational fishing experience for all Californians. We have been a strong proponent for incorporating the use of descending devices into the culture of the recreational groundfish fishery. And the first rule of this cultural change is to avoid the take of constraining species to begin with – consequently we are highly supportive of the adoption of the midwater gear proposal that derived from the Oregon EFP.

Through the use of these two techniques, the recreational impact on constraining species of rockfish should be reduced in future years, and thus open up the possibility of liberalizing the recreational groundfish regulations. As the Council considers its Tier 1 analysis for 2015 and beyond we request that the following conditions be included for California's recreational fishermen:

- Increased season lengths resulting from reduced take of constraining species resulting from use of descending devices
- Access to deeper waters resulting from reduced take of constraining species resulting from use of descending devices
- Increased season lengths resulting from reduced take of constraining species resulting from use of mid-water sport gear
- Access to deeper water resulting from reduced take of constraining species resulting from use of mid-water sport gear
- Combinations of the above

The Tier 1 analysis should be broad enough to cover the full range of potential regulatory options to include 12 month open seasons, and elimination of the recreational RCA depth restrictions.

Thanks

Richard Ross, President  
Coastside Fishing Club

On Wed, Oct 9, 2013 at 10:00 AM, Andrew Guiliano <[andygu@sbcglobal.net](mailto:andygu@sbcglobal.net)> wrote:

Mr Seger,

I received a request for public comment on West Coast Groundfish in the mail yesterday. I believe today is the last day to comment so I will be brief.

I currently fish a Limited Entry fixed gear permit from San Francisco. Other than Dungeness Crab, Groundfish represents the largest contribution of income to my family. Like many, We are a small boat operation providing fresh local seafood to the San Francisco restaurant community.

We have adapted reasonably well under the West Coast catch share program, but would like the council to consider two recommendations:

-Ability to anchor overnight in the RCA. California law allows commercial vessels access in the MLPA area's, which also fall under the RCA, for safe overnight anchoring. Given the large distances we often travel, and the fact that we have 100% VMS coverage, limited access into portions of the RCA would be beneficial for both safety and financial reasons. Specifically in our area in the anchorage at the Main Farallon Island. All other commercial fishing vessels have access to that anchorage other than those who participate in the West Coast Groundfish fishery.

-Access to a greater portion of the RCA. In 2012 only on 632lbs of Yellowtail Rockfish and 282lbs of Widow Rockfish was landed by the entire San Francisco commercial fleet. That's less than 1% of the allowable take under the Catch Share program. It's not that there is a shortage of either fish, the reason is simply that the RCA is too restrictive to allow **Commercial fishing** access into habitat conducive to Yellowtail, Widow and Chilipepper rockfish. At the Same time, CPFV that berth next me have access inside the RCA daily ( state managed under actual depth restrictions, not waypoints as the RCA is determined by), and land thousands of pounds annually. We would like to see some allowance for midwater fishing for Yellowtail, Widow and Chilipepper rockfish by shrinking the RCA, which is currently 30-150 fathoms . Specifically access to 40 fathoms on the inside and 100 fathoms on the outside.

We understand the complications and challenges the council is faced with. We also understand the the complicated nature of crafting regulations for the entire West Coast and trying to strike a balance between fish and fisherman. Among the multitude of responsibilities I have is to provide a conduit of hands-on data from the water to the council. I thank you for the opportunity to do that.

Sincerely,

Andrew Guiliano  
F/V Drake

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

From: **Julie Deyerle** <[kingcodbay@aol.com](mailto:kingcodbay@aol.com)>

Date: Wed, Oct 9, 2013 at 10:58 AM

Subject: Transporting Sablefish to Home Port

To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

To the PFMC,

Please include this in your program review:

Being able to transport Sablefish through an area closed to us for fishing in order to reach our home port to unload will make more sense economically, environmentally, and safety wise. Monitoring should not be an issue because we are already being monitored by VMS.

Here are some important points:

- The Limits are often restricted or lower above Lat36.
- The fishing grounds we use below lat36 are as close or closer to our home port by boat than to Morro Bay.
- At least 5 boats are unloading in Morro Bay instead of Moss Landing because of the regulations currently imposed. This causes a loss of jobs here and substantial added expense for the fishers.
- Fish unloaded in Morro Bay have to be transported by vehicle to Moss Landing. This is expensive, an unnecessary use of fuel, and turns what should be an 8-10 hour day into a 22 hour day.
- Boats are monitored by VMS so you can see where we are fishing and where we are traveling already.

We are asking you to allow us to fish below the Lat36 line and transport our catch to our home port in Moss Landing. This is a reasonable request that can be monitored by systems already in place. Please take this request into consideration at your program review. We understand that you take 2 years to make these decisions. Please understand that our community is negatively affected by these regulations right now. Thank you for your consideration.

Sincerely,  
Julie Deyerle

[Kingcodbay@aol.com](mailto:Kingcodbay@aol.com)  
831-277-8497

From: Louie Zimm, Southern California Charter Representative on the Groundfish Advisory Subpanel

To: Pacific Fisheries Management Council

Re: H.6 2015-2016 Biennial Adjustments to the Recreational Groundfish Fishery South of 34° 27' N. Latitude

As I plan to inform the council regarding the difficult situation that confronts our Southern California fleet and ask for remedy for the 2014 season, I would also like to request the Council consider opening the recreational groundfish fishery south of 34° 27' N. Latitude for 2015 and 2016. My reasons for this are similar to the in-season request for 2014.

In March of this year (2013), the CDFW mandated size limit on Spotted Sand Bass, Barred Sand Bass and Calico Bass was increased from 12 inches to 14 inches. This regulatory change immediately forced the fleet to a 95% live discard situation that will continue as the biomass alters its size profile over the next few years. Thousands of bass were discarded with few retained by anglers.

Barred Sandbass and Calico Bass were the primary fall back target of recreational fishing boats during the January and February rockfish closure.

In this present situation, until the size distribution of the bass population alters, recreational anglers are left with very little opportunity during the January/February time frame.

Access to the rockfish resource is already severely restricted due to existing CCA and RCA area closures. We have also been hit with the movement (by in-season action) of the inshore RCA line from 60 to 50 fathoms.

In addition, the imposition of Marine Protected Areas in Southern California on the 1<sup>st</sup> of January 2012 further restricted our fleets access to rockfish habitat.

Fifteen new Marine Protected Areas are closed to bottomfishing along the mainland coast. Seven new closed areas at Catalina and San Nicholas Island are now closed to the recreational fleet. Furthermore, the north end of San Clemente Island is now a closed military area.

The commercial passenger vessel fleet has been hit especially hard by these combined access restrictions. In 2015 and 2016 the fleet will be facing further layoffs, if passengers have no reasonable opportunity to retain some catches. The CPFV fleet is very concerned about the looming loss of their licensed captains as these trained and highly skilled folks will seek other employment and not return to the fleet.

The primary reason for the Jan./Dec. closure is to restrict the catch of bocaccio. However, we now see that the population of bocaccio is rebounding significantly of Southern California. (See Information Agenda Item G.7.a, Supplemental Attachment 5 from September 2013 Briefing Book). This document shows a projected 2015 OFL of 1,444 tons south of 40 deg., 10 min. latitude with a range of alternative 2015 ABC's from 910 to 1380 tons. This contrasts with the previously proposed 2015 OFL of 881 tons. This substantial increase in recommended OFL is due to greatly increased recruitment.

The scorecard from F9b\_SUP\_GMT\_JUN2013BB shows a projected impact of 125 tons by the California recreational fishery for 2013. This is 23.5% under the allowed attainment of the 163.5 metric ton allocation for this fishery. This ACL is based on a total harvest specification of only 320 tons for the entire bocaccio fishery.

We assert that the impact of a January/February opening of the recreational fishery for rockfish in the Southern California bight would not be sufficient to attain our present ACL and would have no chance of attaining future increased ACLs of this rapidly expanding population of bocaccio.

We also maintain that our present restriction to waters shallower than 50 fathoms greatly restricts our access to the majority of the bocaccio population. This, in conjunction with the bocaccio sub-limit of 3 fish will continue to restrict our impacts.

Please consider an adjustment to the 2015-16 specs to allow a recreational fishery for groundfish south of 34° 27' N. Latitude, during the months of January and February of 2015 and 2016. Also, please review the current policy of restricting recreational fishing to 50 fathoms in view of recent encouraging data regarding the cowcod population structure and our continuing use of recompression technology.