



Washington Trollers Association

Washington Trollers Association
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Doug Fricke, President

March 5, 2001

MAR 12 2001

Mr. Don McIsaac, Executive Director
Pacific Fisheries Management Council
2130 SW Fifth Ave., Suite 224
Portland, OR 97201

Subject: Salmon Troll Incidental Catch of Yellowtail Rockfish

Dear Director McIsaac,

As the Washington Trollers mentioned in the "Strategic Groundfish Plan" letter dated 1-05-01, the "open access" category under which we have been managed has never been appropriate for the salmon troll incidental groundfish catch. We don't think salmon troll incidental groundfish catch is mentioned anywhere in the SAFE documents. Prior to 1999, the groundfish landing allowances were large enough that the salmon troll incidental catch never approached the maximum landing allowances. However, in 1999 and 2000, we found that some of the "open access" landing allowances did in fact force us to return a few of the managed species back to the ocean.

While salmon trolling, we encounter very few of the species noted in the SAFE document. Yellowtail rockfish is the specie that we most encounter and there was a landing limit of 100 pounds per month for the salmon troll incidental harvest under the "open access" management. We would like to set up a yellowtail salmon troll landing management regime in 2001 and beyond that prevents discards, avoids targeting on depressed stocks, and allows a fair allocation of the allowed landing allowance.

We obtained some preliminary information from the Staff of the Washington Department of Fish and Wildlife (WDFW) that shows there is little correlation between increased catches of yellowtail and canary which is the most closely associated depressed groundfish stock. The information also shows that in 1998 (1999 and 2000 data is skewed because of restrictive yellowtail landing allowances) which is the last year that yellowtail allowances exceeded salmon troll encounters, of the 686 coastwise landings that included both salmon and yellowtail, no landings exceeded 1000 pounds and 41 landings exceeded 200 pounds of yellowtail while delivering salmon. The remaining 645 landings delivered less than 200 pounds of yellowtail with their salmon. A person needs to remember that the monthly landing allowance of yellowtail was far in excess of the yellowtail landed with the troll salmon landings. It will be interesting to see what the total troll landings of yellowtail with salmon per year prior to 1999 when the yellowtail landings with salmon were unlimited.

However, with no tie to salmon, there is an incentive to target yellowtail which we want to avoid. Also, to be fair, there needs to be a small landing allowance with no salmon for the days when a

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salmon troller fishes and encounters some yellowtail but is unsuccessful in catching a salmon.

Another difficulty we have is estimating weights at sea. Rather than basing the regulations on weight, it would be better for enforcement and fishermen if the regulation is based on the number of fish allowed to be retained.

We are requesting that the Groundfish Management Team (GMT) analyze the salmon troll yellowtail landings prior to 1999 and propose regulations that will prevent discards by the salmon trollers, prevent targeting when not salmon trolling, and allow a fair allocation of the allowed landings. We are guessing that an appropriate regulation may fall in the range of allowing a salmon troller to land 20 yellowtail plus five additional yellowtail per salmon for each delivery.

We would be happy to work with the GMT and/or answer any concerns regarding our proposal.

Sincerely,

Douglas W. Fricke
(Sf)

Douglas Fricke, President

Cc: WDFW
ODFW
CDFG
GMT
GAP
SAS

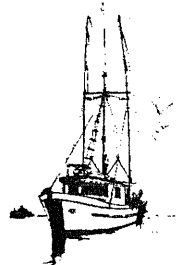
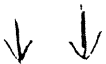


Table C2.--Distribution of troll salmon landings, that had some canary or yellowtail rockfish, among categories reflecting the amount of poundage for each species.

| Year / Yellowtail lbs in landing | California | | | | Oregon | | | | Washington | | | | Coastwide | | | | | | |
|--|-----------------------|------|-------|--------|-----------------------|------|------|-------|-----------------------|-------|-------|------|-----------------------|-------|--------|-------|-----|-------|--|
| | Canary lbs in landing | | | | Canary lbs in landing | | | | Canary lbs in landing | | | | Canary lbs in landing | | | | | | |
| | None | 1-25 | 26-50 | 51-100 | All | None | 1-25 | 26-50 | 51-100 | > 100 | All | None | 1-25 | 26-50 | 51-100 | > 100 | All | | |
| 1998 | | | | | | | | | | | | | | | | | | | |
| None | | | 6 | 1 | 8 | | 56 | 4 | 4 | 2 | 66 | | | | | | 1 | 75 | |
| 1-50 lb | 17 | 3 | 3 | 20 | 20 | 195 | 135 | 6 | 2 | 338 | 4 | | | | | | 4 | 362 | |
| 51-100 lb | 1 | 1 | 1 | 2 | 2 | 44 | 79 | 5 | 1 | 129 | 5 | | | | | | 5 | 136 | |
| 101-200 lb | 1 | | | 1 | 1 | 19 | 40 | 9 | 1 | 69 | 2 | | | | | | 2 | 72 | |
| >200 lb | | | | | 1 | 10 | 18 | 6 | 1 | 36 | 2 | | | | | | 5 | 41 | |
| All | 19 | 10 | 10 | 31 | 31 | 268 | 328 | 30 | 8 | 638 | 13 | | | | | | 17 | 686 | |
| 1999 | | | | | | | | | | | | | | | | | | | |
| None | | | 10 | 10 | 10 | | 67 | 6 | 2 | 4 | 79 | | | | | | 1 | 93 | |
| 1-50 lb | 10 | 4 | 4 | 14 | 14 | 18 | 73 | 14 | 2 | 1 | 108 | 21 | | | | | 24 | 146 | |
| 51-100 lb | 4 | | | 4 | 4 | 1 | 1 | 3 | 1 | 1 | 7 | 5 | | | | | 5 | 16 | |
| 101-200 lb | | | | | | | | | 2 | 2 | 2 | 6 | | | | | 12 | 14 | |
| >200 lb | | | | | | | | | | | | 9 | | | | | 10 | 10 | |
| All | 14 | 14 | 14 | 28 | 28 | 19 | 141 | 23 | 5 | 8 | 196 | 41 | | | | | 55 | 279 | |
| 2000 | | | | | | | | | | | | | | | | | | | |
| None | | | 9 | 1 | 10 | | 118 | 8 | 1 | | 127 | | | | | | 12 | 149 | |
| 1-50 lb | 26 | 2 | 2 | 28 | 28 | 92 | 119 | 14 | 2 | | 227 | 5 | | | | | 17 | 272 | |
| 51-100 lb | 2 | 1 | 1 | 4 | 4 | 2 | | 4 | | | 6 | 1 | | | | | 10 | 20 | |
| 101-200 lb | 1 | | 1 | 2 | 2 | | | | | | | | | | | | 1 | 2 | |
| All | 29 | 13 | 13 | 44 | 44 | 94 | 237 | 26 | 3 | | 360 | 6 | | | | | 39 | 443 | |
| 1998-2000 | | | | | | | | | | | | | | | | | | | |
| None | | | 25 | 2 | 28 | | 241 | 18 | 7 | 6 | 272 | | | | | | 8 | 317 | |
| 1-50 lb | 53 | 9 | 9 | 62 | 62 | 305 | 327 | 34 | 6 | 1 | 673 | 30 | | | | | 12 | 780 | |
| 51-100 lb | 7 | 2 | 2 | 10 | 10 | 47 | 80 | 12 | 2 | | 142 | 11 | | | | | 7 | 172 | |
| 101-200 lb | 2 | 1 | 1 | 3 | 3 | 19 | 40 | 9 | 3 | 3 | 71 | 8 | | | | | 14 | 88 | |
| >200 lb | | | | | | 10 | 18 | 6 | 1 | 1 | 36 | 11 | | | | | 3 | 51 | |
| All | 62 | 37 | 37 | 103 | 103 | 381 | 706 | 79 | 16 | 12 | 1,194 | 60 | | | | | 28 | 1,408 | |



February 20, 2001

John Mellor
627 Pacific Ave.
Alameda, Ca.
94501
(510)814-8979

RECEIVED

FEB 27 2001

PFMC

Lou Ferrari
17 Bretano Way
Greenbrae, Ca.
94904
(415)461-2008

We are two individuals who historically rely on the nearshore groundfish fishery. We use the traditional method of longlining to harvest nearshore rockfish, as well as deeper water rockfish and sablefish.

Longlining hasn't evolved much in the last 125 years or so that people have been doing it on the west coast. We've gone from using baskets to metal wash-tubs to keep the lines in other than that it is pretty much the same- there is a horizontal groundline with hooks spaced a certain distance apart. It is anchored on each end and each end has a buoyline and a buoy. It is very labor intensive. The groundline must be untangled and coiled perfectly and every hook baited before it can be set. Although we set what seems like a lot of hooks, only a small percentage of hooks catches a fish. Much of the bait is eaten by sand flees or comes back on the hook. Only the aggressive feeding fish are caught. This is very tiresome work- only the most dedicated fishermen want to be longliners.

Between the two of us we have a combined total of over 50 years experience fishing for rockfish in California. Although our gear type isn't in the majority in terms of fishing effort for rockfish, our's has been around the longest. There is a small group of longliners in just about every fishing port in Northern and Central California. We rely on rockfish to support our families for much of the year.

Recently, since the Pacific Fisheries Management Council (PFMC) has stopped the larger roller gear we have noticed improved fishing for the shelfrockfish species and the near shore rockfish species in the deeper water. We have also however, noticed a decline in nearshore rockfish abundance close to shore.

Recently the PFMC dumped the nearshore problem on the California Fish and Game Commission. The PFMC recommended certain closures for rockfish, but because certain members of the Council are involved with the sport fishing industry, they lobbied to keep fishing open inside 20 fathoms.

We believe that this will make a bad situation worse because it will focus all effort onto

the already beleaguered nearshore stocks close to shore.

It is our belief that in order to protect spawning nearshore rockfish there should be a closure of all rockfish fishing, sport and commercial, out to a quarter mile from shore on the California coast. This would exclude anglers fishing from shore and sport divers. If the Commission insists upon the 20 fathom rockfish fishery, it can still be accomplished with the quarter mile closure since 20 fathoms runs for several miles offshore in many areas.

Several years ago we switched from j-hooks to circle-hooks. We have noticed that with the circle-hook, 99% of the rockfish caught are lip hooked, making it easy to keep them alive or release them. With j-hooks a much larger percentage of rockfish swallow the hook, causing a much increased hook mortality rate.

We believe that if the Commission is serious about helping the nearshore rockfish, it should consider a circle-hook only fishery for sport and commercial fishing.

The California Fish and Game Commission has also proposed the closure of our traditional fishing grounds between Point Reyes and Bolinas point. We use this area primarily as a backup to clean our lines off when we can't reach offshore because of bad weather. Since there isn't much fishing pressure in this area, there would be very little benefit in terms of fish conservation by closing it. We would welcome however the quarter mile closure in this area as we've previously stated.

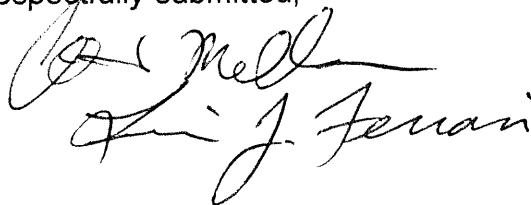
There is a misconception brought on by the recreational sector that the commercial nearshore fishery is a recent phenomenon. This is untrue!

The nearshore rockfish species have always been more valuable than other rockfish and have been harvested commercially, live and dead, for many years. The recent publicity regarding the live nearshore fishery is due to the recent influx of new participants in the fishery and because of the attention focused on the Asian live fish and animal market. It would be unfair to shut down the live fish fishery because certain individuals and groups don't approve of Asian customs. Historic reliance upon the fishery by longliners should also be considered.

We recommend that the Commission take no action on the proposal by sport fishers to change our traditional gear type. We see this as a ploy to grab the resource for themselves. It has nothing to do with fish conservation. They make no suggestions to limit themselves, such as banning treble-hooks and j-hooks.

Because of our dedication and our extensive experience in the nearshore rockfish fishery we believe that we are qualified to help the Commission to come up with a plan to preserve the nearshore stocks for future generations. We invite the Commission to work with us to achieve this goal.

Respectfully submitted,



Jim J. Ferrari

Subject: Please Preserve our fisheries

Date: Wed, 14 Mar 2001 06:20:24 -0800

From: "Coston, Bob" <bob.coston@lmco.com>

To: "'sandra.krause@noaa.gov'" <sandra.krause@noaa.gov>

The Pacific Fishery Management Council

I, as a California recreational angler, find the increasing body of evidence indicating the severe depletion of California's groundfish stocks alarming. I believe the interim CDFG regulations will prove inadequate to stop further deterioration of the stocks and urge the department to implement the following measures.

Immediately end the use of traps for catching fish.

Restrict commercial fishing to the use of rod-and-reel gear in waters less than 60 fathoms, and radically reduce the number of fish caught per day per vessel.

Require all rockfish catches be landed at designated landing sites where DFG employees are present to monitor and sample the catch. Documentation of the catch by CDFG would be provided. Charging commercial vessels would fund the program.

Require all merchants to document purchases and sales of rockfish so they could be tracked back to the fisherman.

Seasonal closures should be timed when the majority of species in an area are spawning, such as banning ling cod fishing in water less than 20 fathoms in December and January.

Begin recruitment and training of an enforcement staff large enough to make the regulations effective.

Dramatically increase penalties for any violation of Fish & Game regulations associated with groundfish; including poaching and possession of undocumented catch, to include seizure of assets.

These emergency measures, if enacted and enforced, may allow us to save this valuable public resource while the while the long-term solutions and regulations required to create a sustainable fishery are established.

Thanks In advance for your preserving our heritage!

Bob Coston

Fishsniffer.com

"The West Coast groundfish fishery cannot ever reach sustainable levels, either biologically or economically, if it continues as is," wrote the Pacific Marine Conservation Council in their newsletter last summer. The PMCC is a non-profit group based in Astoria Oregon.

Government agencies, commercial fishermen and sport anglers agree the California groundfish fishery is in trouble. After years of inaction, and many species of rockfish being on the verge of collapse, the California Department of Fish and Game, at the insistence of the Pacific Fishery Management Council Commission have enacted interim regulations aimed at protecting the fishery while the long-term solutions are to be determined over the course of the year.

The caveat being, the regulations have been formulated without any accurate data regarding the fishery or the fishery harvest. I can't tell you how hard it has been to find any data on the fishery, and the information published by CDFG, <http://www.dfg.ca.gov/mrd/mlma/reports/> (Only the Acrobat Files have the numbers), is unbelievable if given more than a cursory reading.

The problem with the Interim Regulations, <http://www.fishsniffer.com/steelhead/020201rockfishregs.html>, is they fail to address the most serious threats to the fishery, highly efficient commercial gear, blanket harvest (<http://www.fishsniffer.com/steelhead/021201bgrockfish.html#fishtrap>), and illegal catch, while at the same time create economic havoc for the sportfishing and coastal tourism industry.

Regulations enacted without effective enforcement and severe penalties will prove futile. Unfortunately the history of CDFG enforcement is not encouraging. They are simply understaffed for the challenges they are facing. Unless manpower is increased and the agency is better organized, whatever regulations are adopted, are doomed to failure.

For Example:

An interim rockfish species quota has been adopted by the California Fish And Game Commission, however, the CDFG has yet to establish verification methods or obtain the funding to pay for them.

Meanwhile, the commercial livefish boats are systematically cleaning out the nearshore fishery. "On Friday, October 27, 2000, five commercial livefish boats were working 50 traps in a kelp bed the size of a football field inside Noyo Cove. The traps were set five or ten yards apart," a Fish Sniffer Reader reported.

A 1996 NMFS study showed that most of the live fish sold in their sample of San Francisco fish markets and restaurants were sub legal and/or undocumented.

At this moment we are heading into another season where the documentation of the commercial catch will be spotty at best, while the unreported illegal catch goes completely undocumented. Current lack of enforcing reporting statutes for commercial passenger fishing vessels, party boats, also brings into question the validity of that source of data, <http://www.fishsniffer.com/steelhead/021201bgrockfish.html#available>.

But rest assured, the fishery will be hammered for another year while we attend endless hearings to develop another set of temporary regulations, which the State can't enforce. Unless California can find the courage and determination to make meaningful change stick, the future of the groundfish species in California is bleak.

Where do we go from here?

Immediately end the use of traps for catching fish.

Restrict commercial fishing to the use of rod-and-reel gear in waters less than 60 fathoms, and limit the number of fish caught per day per vessel. We are in agreement with, and support the United Anglers proposed limit of 20 fish per day per commercial fishing vessel.

Require all rockfish catches be landed at designated landing sites where DFG employees are present to monitor and sample the catch. Documentation of the catch by CDFG would be provided. Charging commercial vessels would fund the program.

Require all merchants to document purchases and sales of rockfish so they could be tracked back to the fisherman.

Seasonal closures should be timed when the majority of species in an area are spawning, such as banning ling cod fishing in water less than 20 fathoms in December and January.

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Begin moving to a computer based licensing system such as in use by the State of Oregon. This would allow limiting the amount of days the recreational anglers could target rockfish through the use of stamps affixed to the license.

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Tougher Interim Regulations Needed to Protect Rockfish Stocks



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[Send This Page to a Friend!](#)By: Richard Alves
February 12, 2001

Send a prepared Action Alert letter

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These emergency measures, if enacted and enforced, may allow us to save this valuable public resource while the while the long-term solutions and regulations required to create a sustainable fishery are established.

Help restore the California groundfish fishery by urging the California Department of Fish & Game to adopt the emergency measures outlined here, by sending the following letter.

SEND THIS PAGE TO:

The Pacific Fishery Management Council

California Department of Fish & Game
Director, Robert Hight

Marine Life Management Act
Marija Vojkovich

State of California
Governor Gray Davis

California State Assembly Natural Resources Committee
Howard Wayne, Chair
Dennis Hollingsworth, Vice Chair

California State Senate Natural Resources and Wildlife Committee
Sheila James Kuehl, Chair
Thomas Oller, Vice Chair

It will be quoted in its entirety prefaced by your comments (should you wish to add any) and:

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| | |
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