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JUN 03 2003

**PFMC**

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, Oregon 97220-1384  
503-326-6352

Concerned: SPORT FISHERMAN

I am extremely upset that the people that are charged with protecting our marine resources for future generations are buckling under the pressure from the environmental extremists. On the central coast there is very little sport fishing pressure on the resource but we are singled out to solve the problem while the real problem of commercial over fishing and coastal pollution are overlooked. There is new science that supports 12-month rock cod seasons with a ten rockfish bag limit out to 50 fathoms or 300 ft for the sport fisherman. They owe it to us since they made emergency closures last year and mistakenly took away our season this year for no reason.

Also there should be smaller management zones with individual quotas for each zone. This way each zone is not closed or opened depending on fish that were caught somewhere else (northern or southern California) but based on the resource that is within that zone. For us that would be a management zone from Pt. Sur to Pt. Conception.

Sincerely  
Terry Schafer



# OUTER BANKS

253 Highland Drive  
Channel Islands Beach  
California 93035  
Tim Athens, Owner

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Commercial Fisheries  
(805) 984-5338  
Fax: (805) 985-JAWS  
email: NeptuneOBS@aol.com

Members of the PFMC and GMT

PFMC

2 JUNE 2003

RE: CCA / RCA boundaries; groundfish allocation; restricted access; LE fleet trip limits

It has come to my attention that the Council may consider easing restrictions on shelf rockfish fishing in the second half of 2003 in light of new information concerning the status of the bocaccio resource. First, I'd like to take the opportunity to commend those involved in making revisions to some of the fundamental variables in the scientific population model this year by their use of the most up-to-date biological information. These modifications have produced a much-more realistic estimate of the current population size.

That being said, I would like you to know that I have been commercially fishing various shelf rockfish species off the coast of southern California for nearly 30 years, am a 'federal A fixed gear permittee', and serve on the PFMC's Habitat Technical Review Committee.

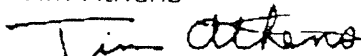
The PFMC and GMT now have some difficult decisions ahead on how best to handle the need to ease these restrictions, respecting the need to maintain existing protection for other overfished rockfish species. Furthermore, the situation now prompts the question of how to allocate 'the shelf' between fishery sectors. I would like to make a few recommendations on these matters.

1. For offshore southern California waters, the Cowcod Conservation Area (CCA) goals, objectives, and boundaries need immediate re-examination relative to the Rockfish Conservation Area (RCA). When we were first faced with the giant swath of closed area in the CCA, we were told that this much area needed to be placed off-limits to ensure adequate protection for 50 percent of the cowcod population. While cowcod have specific depth ranges, it was decided, for enforcement purposes, that only big square or rectangular dimensions would be enforceable, causing the loss of many hundreds of square miles of deeper fishable habitat for minor slope rockfish, blackcod and thornyheads. Yet in 2001, the PFMC moved to the use of closure areas defined by depth contours, and has continued with this strategy ever since. No management action has been taken to reduce the CCA boundaries to compensate for this additional protection which came on-line with the RCA. Clearly, it is arbitrary, redundant, and not in the spirit of sound scientific management to leave the current boundaries of the CCA status quo while enforcing the current RCA boundaries. Without question, the current CCA boundaries are antiquated. Now, with requirements looming for VMS to address enforcement concerns, the limited entry commercial fishery should be given additional access to deeper waters needlessly closed in the CCA. Moving the 'outward line' in to 180 fathoms would be a good start.

2. On the matter of allocation of the bocaccio OY between sectors, it seems most sensible, fair, and equitable to return to the 56/44 percent split between recreational and commercial resources that was in place in 2002. Loss of access to shelf resources was imposed equally between sectors for 2003, and thus the return of access should be dealt with in the same manner.
3. However, in the case of the commercial allocation of bocaccio, it is imperative that the PFMC and GMT be cautious in how this catch is subdivided between the limited entry and open-access fleet. Percentages and splits aside, management **MUST** take into account that we need to do everything possible to **PROHIBIT NEW FISHING EFFORT ON THE SHELF** by establishing shelf trip limits for open-access that allow for incidental landings, but serve to deter new involvement. The West Coast groundfish crisis is not over, and we need to remember that there is still a substantial open-access component to this fishery. It does not need to increase in size. Inexplicably, to this day, if the shelf were opened, vessel owners who have never landed a rockfish can still register their vessel commercially, buy a commercial license and go out on the shelf and fish for rockfish. Given California's recent actions restricting access to the nearshore, we need to prevent effort shift on the shelf. If the PFMC believes in their policies regarding the value of the use of restricted access as a mechanism to reduce effort in a fishery, setting these trip limits for open access should be of utmost importance.
4. Set appropriate trip limits that allow us to more fully utilize the minor shelf OY. Efforts to protect bocaccio have resulted in a loss of access for everybody to this OY. As you are aware, the level at which our minor shelf trip limits are set is far more important than the volume of bocaccio we will be authorized to take, as other shelf species are more important to our markets. In the past, the PFMC has provided a 200-pound monthly trip limit, which was paired with a 1,000 pound per month shelf trip limit. Given our ability to more purely target species such as vermilion, and chilipepper rockfish etc. I'd suggest, for the **COMMERCIAL LIMITED ENTRY FLEET ONLY**, that ratio perhaps be loosened so that we can target the shelf species which are not overfished by implementing higher shelf limits. Such a strategy would still accomplish the goal of prohibiting discard of bocaccio, yet would authorize the take of this resource by the component of the commercial fishery that the PFMC has identified as having priority.

Thank you for your consideration,

Tim Athens



CC: PFMC GMT F&G Commission Voikovich Wolf Barnes