

RECEIVED

JUN - 9 2003

Kenyon Hensel
871 Elk Valley rd
Crescent City CA
95531
707-465-6857

PFMC

Re: Northern area near shore management year 2003 mid season adjustments.

I must protest as strongly as possible the current management trends for the near shore waters north of the 40/10 line. Both California and Oregon are currently managing the near shore waters using an OY based on a single previous years catch instead of the required catch history, or biological stock assessments.

This year's OY is based on the year 2000 catch where the near shore commercial fishermen were constrained by the lowest bi-monthly limits ever imposed. These limits, though raised at each PFMC meeting though out that year, constrained catch to 186mts out of a 225mt OY.

I have been told this OY is not large enough to allow the seasonal up ward catch adjustments the fishermen need to take advantage of the good weather and strong market of the summer months. This has created a situation that threatens long established markets and infrastructure up and down the coast.

I was also told last fall, that because of the way that this years OY was derived, it would be soft number subject to mid season adjustments. That is the reason I did not protest more strongly at the time. **I am asking that the council to fallow through on that second promise and consider these scenarios for mid season adjustments.**

One: Simply allow the upward adjustment of the year 2000 to this summer's catch. The increases may or may not create an over fishing of the OY. In the year 2000 we had an increase to 6000lbs per two months by the July fishing period. The fishery was then reduced to 2000 per month in October for a landed catch of 186mts. The number being used for this years OY.

Two: Relieve the northern area of the precautionary measures, applied to the black rockfish portion of this year's OY. These measures are no longer necessary in light of the latest Black Rock fish assessment. By allowing the commercial fishery to fish this year's OY without cutting it in half first, we could double catch rates at this meeting.

Three: Allow upward adjustments in catch rates for the different sub management areas at the June meeting. The council's intent should be that that the commercial catch be all of, or even a portion over, the 186mt northern area OY. In consideration of the increases indicated by this year's stock assessment and the fact that this years OY is not derived from biological information, over fishing would not be the out come in any of these scenarios.

We badly need to have an increase in the black and blue rockfish component of our catch allowances. With out the seasonal increases in these fish, some of the last near shore markets will be lost along with the infrastructure that supports them. Many fishermen, especially those who fish out side of the areas that can supply the live market, cannot make enough money to support their fishing efforts. This hardship is completely unnecessary in light of the recent stock assessment for Black Rock fish. I can see no reason for the council to arbitrarily harm the near shore commercial fishery to this degree. Not rising this year's mid season catch levels will cause grater damage to this fishery then any previous council action.

Kenyon Hensel



UNITED ANGLERS
of Southern California

5948 Warner Avenue
Huntington Beach, CA 92649
714 840-0227 TEL
714 840-3146 FAX

RECEIVED

JUN 10 2003

PFMC

June 9, 2003

Dr. Don McIsaac, Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place
Portland, OR 97220

RE: Comments for the Pacific Coast Groundfish 2003 In-season Adjustments and Management Measures for 2004

Dear Dr. McIsaac:

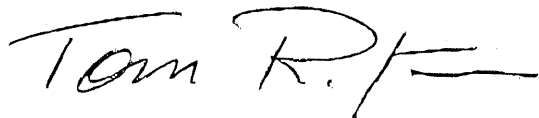
United Anglers of Southern California is the state's largest association of recreational anglers. We represent some 50,000 affiliated sportfishermen throughout California dedicated to ensuring quality fishing today and tomorrow.

It is our belief that much of the cause of this failure to adequately manage the groundfish fisheries is a result of lack of attention to the issue of bycatch and habitat protection. Over the past 20 years management has focused on measures to redirect effort from certain rockfish by imposing trip limits and monthly landing limits on commercial fishing activities that impact rockfish. This approach however has not had a great effect on the effort being exerted in the prime habitat zones for these species. Groundfish trawls and open access trawls have continued to trawl the same areas with the primary difference only being the target specie. Trip limits and monthly landing limits are an invitation to high grading and increases in bycatch and possibly even longer drags over sensitive habitat. Additionally, the PFMC in managing groundfish hasn't yet begun collecting essential fishery information on exempted trawls.

The management regime for 2003 virtually ended groundfishing by recreational anglers. It has recently come to light that recently obtained data has painted a better picture for the bocaccio stocks. Since this data improvement does not appear to imply a recovery of bocaccio but instead appears to indicate that the rates of stock declines were not as steep as originally estimated the council should continue to move in a precautionary manner. We certainly do not want to return to the management regime of 2003.

In recognition of the improved data UASC believes that immediate action should be taken to ease restrictions. However, we request that such relief not extend to an easing of restrictions within the core habitat of bocaccio between 50 and 200 fathoms for the remainder of 2003 and for 2004.

Sincerely,

A handwritten signature in black ink that reads "Tom R. Raftican". The signature is written in a cursive style with a long horizontal stroke at the end.

Tom Raftican
President, United Anglers of Southern California

Cc: Robert C. Hight, Director, California Department of Fish and Game
Michael Flores, President, California Fish and Game Commission