

May 22, 2006

John Devore  
Groundfish Advisory Subpanel  
7700NE Ambassador Place suite 200  
Portland, Oregon 97220-1384

RECEIVED  
MAY 23 2006  
PFMC

Dear Sir:

Enclosed is a proposal for an Exempted Fishing Permit I wish to be considered for. I understand that EPFs will not be on the agenda for the upcoming June meeting, however I do want to be included in future considerations later this year. I will explore the at sea observer coverage issue as the process proceeds. The possibility of state sponsorship has been suggested.

My attempts to have contact with other fishermen with similar goals, thus pooling the request, have been unproductive. It was hoped that by pooling the proposal the council's time would be used more effectively. As the closing date for filing rapidly approaches I have decided to pursue this application independently. Of the fishermen I spoke to personally they felt disenfranchised by the whole process and were not interested for various reasons. Unfortunately, by nature fishermen are often independent, often to their own detriment.

Sincerely,



Rob Kraencke

F/V Lady LeBlanc

## Proposal

The goal of this exempted fishing permit (EFP) is to demonstrate it is possible to harvest healthy stocks of Chilipepper Rockfish while avoiding other species deemed less healthy. This EFP would allow a limited number of vessels take Chilipepper rockfish shoreward of the RCA boundary line using trolled hook and line gear known as “carpet runner” gear. At this time pursuing this underealized resource is economically unfeasible due to Chilipepper rockfish being considered part of the 200 pounds per two month period limit for shelf rockfish. Allowing Chilipepper rockfish to be in a separate category and increasing the limit to 2000 pounds per month would make this a viable fishery. This would provide an alternative to replace lost fishing opportunities available to small vessels as a result of other council actions. By allowing permittees to fish in the present RCA, the fishing would be done in the area where the targeted fish are found in the greatest numbers. There would be 100% retention of legal fish with only prohibited species being discarded. Trips would have 100% observer coverage to document and record the species caught.

## Rationale:

1. The California Department of Fish and Game, in their regulations encourages experimental fishing methods (section 8606). This section allows new types of commercial fishing gear and methods in areas otherwise closed. Carpet runner gear allows for the use of existing salmon fishing machinery with limited expenditure for modifications.
2. The Chilipepper rockfish stock is healthy and harvest should be allowed if it can be proven that non-target fish stocks may be avoided. A quote from a DFG document: [dfg.ca.gov/MRD/MLPA/response/shelf](http://dfg.ca.gov/MRD/MLPA/response/shelf) “A few shelf rockfish species such as Chilipepper and Yellowtail appear to be comparatively healthy; their allowable take has been set at levels below the potential yield to protect the weaker species that tend to be caught with them, such as Bocaccio and Canary”.
3. The fishing gear proposed can be set at a depth that is less likely to have contact non-target species such as Canary rockfish (further from the bottom). Cowcod and Yelloweye rockfish are not commonly found in the proposed fishing area. During several salmon fishing trips within the RCA in 2005 the abundance of Chilipepper rockfish was noted. No Bocaccio rockfish were encountered with the trolled salmon gear during those trips.
4. Trolled gear, unlike trawl gear, has a relatively small catch capacity. The number of hooks used limits the catch in any one “tow” so any contact with non-targeted species would be limited. The tows are much shorter in duration than trawl tows and the vessel can easily move to another fishing area if non-targeted species are hooked.

5. The limit for Bocaccio is set at between 100 -200 pounds per period and is unlikely to be reached with selective fishing practices. If this limit were reached, the permit vessel would not be allowed to fish until the next fishing period.
  
6. The fish caught by hook and line are handled much differently than trawl caught fish. Their superior appearance allows them to be more easily sold in the round for a higher price than trawl fish destined for the fillet market. The large ethnic communities in the San Francisco Bay area represent a consistently reliable market for this high quality round fish. A similar fish, Ocean Perch, are currently being imported from Canada to fill this market. Hook and line fishing seems to be a way of allowing a small harvest of a healthy resource for the most economic benefit to small vessel fishermen.
  
7. The limited availability of observers presents a challenge, however most vessels are already fishing in the groundfish fishery where observers are required. If the experimental fishing were done during the period the observer was already required to be aboard the vessel there would not be a net increase in observer coverage. The assumed higher catch rate fishing Chilipepper rockfish over nearshore fishing would allow the limit to be reached with fewer trips so it is possible the number of observer covered trips could actually be reduced.

## Applicant Information

Applicants:     Robert Kraencke                     Jerry Pemberton  
                   280 Douglane Ave.                     426 Beach Street  
                   San Jose, Ca. 95117                     Half Moon Bay, Ca. 94019  
                   Phone: 408-887-4567                     Phone 650-619-0388

Vessel:           Lady LeBlanc  
                   F&G 49548

Fishing Area:   Latitude 38N to 36:50  
                   Depth 60 to 100 fathoms

Time Period:    April – November for a 2 year period