

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE
 RESPONSE TO CALIFORNIA DEPARTMENT OF FISH AND GAME (CDFG) REPORT
 ON YELLOWEYE ROCKFISH RECREATIONAL HARVEST GUIDELINE
 CATCH-SHARING OPTIONS

In response to the California Department of Fish and Game’s report (Agenda Item F.4.b, CDFG Report), the Washington Department of Fish and Wildlife would like to offer the following corrections:

1. p. 2 – Fishery Sector Apportionment: All fisheries are affected by the adopted OY—we strongly disagree that tribal, open access, research, and exempted fishing permit set asides (unchangeables) are to be held harmless from restrictions. We acknowledge that the Council has limited ability to affect research catch; however, the other three fisheries are subject to Council management and considered along with all sectors that impact a particular species of concern.

2. p. 4 – Table 1. The combined Oregon and Washington harvest guideline for yelloweye rockfish in 2005 was 6.7 mt (the same as it was in 2006), not 9.4 mt.

3. p. 4 – California Recreational Catch Projection Methodology: As noted on pages 2 and 3, the recreational total in 2005 and 2006 was 10.4 mt, and the recreational total in 2007 and 2008 is 8.9 mt. While California’s “share” of the recreational total decreased, the reference to “California...relinquished...their 2006 yelloweye rockfish recreational HG to the other states to minimize the need for further reductions in Oregon and Washington’s recreational fisheries management strategy in 2007-2008” is incorrect and misleading.

In reviewing the amount of the recreational component of the total, the total estimated mortality (not the OY) must be taken into account (Table 1).

Table 1. Yelloweye rockfish catch estimate summary, 2005-08.

Year	Recreational HG Total	Non-Tribal Commercial	Research	Total Est Mortality	OY	Residual
2005	10.4	6.2	1.0	21.3	26	4.7
2006	10.4	6.0	2.0	21.1	27	5.9
2007	8.9	5.5	2.0	18.5	23	4.5
2008	8.9	5.9	3.0	18.9	20	1.1

The recreational component of the overall total has decreased since 2005 and 2006 (Table 2), whereas the commercial and research components have increased; therefore, it’s incorrect to state that the California recreational reduction of 1.6 mt (from 3.7 – 2.1) went to Oregon and Washington recreational fisheries.

Table 2. Percentage of yelloweye rockfish catches, by fishery, 2005-08.

Year	% of Total		
	Recreational	Non-Tribal Commercial	Research
2005	48.8%	29.1%	4.7%
2006	49.3%	28.4%	9.5%
2007	48.1%	29.7%	10.8%
2008	47.1%	31.2%	15.9%

It would be correct to state that the 1.6 mt of yelloweye rockfish previously assigned to the California recreational fishery was distributed among other non-recreational fisheries, including directed commercial fisheries and research catch, and contributed to the overall amount of residual.

4. p. 9 and p. 11 – Analysis of Recreational Catch Sharing Alternatives: The reference to Washington having a year-round season is grossly misleading. Given the weather and rough water conditions off Washington’s coast, particularly in the winter (and oftentimes spring) months, in reality, Washington’s recreational fishery is, at best, seven months long (mid-March through mid-October) in Catch Areas 1, 2, and 3, which is consistent with the lingcod season. In Catch Area 4, this season is reduced by a month, as lingcod does not open until mid-April. In addition, nearly every charter boat’s insurance policy has a lay-up provision extending from October 15th through March 15th.

In addition to these corrections and clarifications, WDFW would like to point out that the California recreational harvest guidelines for 2007 and 2008 were based on the projected impacts resulting from the California recreational impact model developed and presented by CDFG. None of the other government entities, including the tribes, and the Washington and Oregon Departments of Fish and Wildlife, or any of the fishery sectors advocated reducing the amount of the California recreational harvest guideline for 2007 and 2008; the guideline was set at the level recommended by CDFG.

For CDFG to identify Washington and Oregon recreational fisheries as the source to provide additional yelloweye rockfish for the California recreational fisheries by presenting options that only focus on reapportionment within the recreational total, especially when those fisheries did not benefit from the yelloweye that California gave up, is shortsighted.

Washington does not have a nearshore directed commercial fishery where, according to the scorecard, 1.6 mt of yelloweye are harvested. We closed state waters to the directed hook-and-line fishery beginning in 1996, and prohibited the live fish fishery in 2000. Instead of taking yelloweye in a nearshore commercial fishery, Washington has instead reserved its nearshore stocks for recreational harvest.

However, in spite of our concerns with the manner in which CDFG has represented this issue, WDFW recognizes that we are all in this together and we need to cooperatively adopt measures to reduce our overall estimated yelloweye rockfish impacts to ensure we stay within the rebuilding annual catch limit. In that spirit of cooperation, we have developed a preliminary preferred alternative for the Washington recreational fishery for the Council’s consideration (Agenda Item F.4.b, WDFW Report 2).