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Subject: Item I 3 John Devore  
To: [pmmc.comments@noaa.gov](mailto:pmmc.comments@noaa.gov)

Regarding the black rock fish assessment being considered by the council, as I have decades of experience catching and handling black rock in Northern California, I would like to share some of my observations on the life history of these fish. I will also comment on data inputs and alternative abundance indicators available to create a more accurate assessment.

I hope sampling includes the information from our years of commercial observer data and state port sampling that has been collected since the late nineties. I ask that the council press to include sampling from both the sport and commercial fisheries. I have had my catches sexed and aged ( odoliscs removed) in pass years. Recency,only lengths are being collected. Industry and managers should agree on what data should be collected and how, to make assessments more accurate.

The upcoming assessment on black rock fish, has some very disturbing changes in life history.It goes against all of my experience in observing, catching and handling of this species that they live to be fifty years old. All other fish of that age category are found in small concentrations and grow to much greater size. Most of these older fish live in the lower water strata have completely different body builds and feeding habits. Black rock fish live in the mid and upper water column, expend much more energy feeding and are found in very large schools. Just the opposite of other long lived species. They also exhibit a high metabolism. When we hold black rock fish for our live markets, they do not last, in a week they are shedding scales and becoming unhealthy. Yet other benthic species can store for over six weeks under the same conditions. Also black rock fish rarely grow past six or seven pounds, where as other long lived fish are found at larger sizes.

Also there is a new issue over male to female ratio, I have cut tens of thousands of these fish and have had my catches sampled for sex. Male to female ratios have varied but not to extreme. Our local stocks are very productive showing fish from many year classes through out the schools.

Another sigh of raising abundance is our recent raise in catch per unit effort. As I have testified before, all of us near shore black rock fishermen in this area have enjoyed fishing, or should I say catching, unlike anything since we started to fish these stocks. As I tried to illustrate in my video presentation of fish rushing the boat, which happens because of large schools of fish competing for bait, there are more and more fish showing on our reefs.

Finely, I propose that we build a better model of fisheries management around the commercial black rock fish fishery in the management area from Cape Mendocino to the California Oregon boarder. Because this area and fishery has a small controlled amount of fisherman and is geographical separated for management, we could more easily create a model for integration of data collection to inform management decisions. I would be willing to work with the fishermen and scientists to produce such a fishery. I think, in the course of our work on the water, we can monitor while we harvest. Insuring sustainable catches with reduced uncertainty for both management, and fishermen.