



November 4, 2015

Electronic Submission via:
pfmc.comments@noaa.gov.

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: Blackgill-Slope Complex Final Reallocation and Accumulation Limits

Dear Chair Lowman and Council members,

We are writing in regards to the Council considering a process to restructure the Slope Rockfish complex south of 40° 10' management line by removing blackgill rockfish from the complex and reallocating the harvestable surplus of both blackgill rockfish and the remaining stocks in the southern Slope Rockfish complex.

To this end, we request the Council to take "No Action" on this matter. Any proposed changes being considered by the Council would have disproportionately larger impacts on vessels south of the 40° 10' with the significant impact on trawlers and the most substantial adverse social and economic effects on the Fort Bragg fishing port community.

Fort Bragg is the port with the highest trawl landings of blackgill. In 2014, Fort Bragg saw well over 18.8 metric tons of blackgill landed, which is almost 20 times more than any other port. IFQ vessels primarily catch blackgill south of 40° 10', and it is difficult to avoid catching when targeting other stocks.

Removing blackgill from the Slope Rockfish complex will result in a sharp decrease in landings, not only of blackgill but of the many other high value and high volume species commonly landed by Fort Bragg Fishermen. If blackgill rockfish were removed from the complex and managed separately as a quota species, it will create another constraining species, and will result in a significant redistribution of revenues away from Fort Bragg and other small fishing port communities like it in California. Many of these small ports already are disadvantaged and struggling to remain viable in the uncertain climate of the IFQ fishery, and removing blackgill will unnecessarily cause additional hardship and uncertainty.

Fishermen in small port communities in California such as Fort Bragg operate their businesses on tight margins that rely on the historical catch of blackgill. Any Council action taken to reduce access to fishing rights to a select number of small port communities in California would create an unfair hardship to those fishing operations and to the harbor communities they support.

Any proposed action by the Council, (other than no action) likely does not fulfill the specific purposes of "providing greater resource protection while minimizing disruption of current fisheries" and ensuring "an equitable allocation of the harvestable surplus of blackgill." Also, there is no immediate conservation issue requiring reduced harvest of blackgill by the trawl sector.

Continual changes to the quota program are adding instability for business planning purposes and operational activities on the water. Removing blackgill from the southern Slope Rockfish complex will create additional complexity and add instability to an already unstable fishery from an economic standpoint.

Taking "No Action" demonstrates the Council's commitment to ensuring the IFQ groundfish fishery remains viable in small fishing port communities in California and that each State will receive a fair and equitable distribution of quota, resources and management measures. "No Action" affirms the Council's desire to ensure continued successful environmental gains brought about by the IFQ program, and sends a strong message that the Council recognizes and acknowledges small fishing operations are critical to the economic stability of their communities, and to the economic stability of the Northern California coast.

Thank you for your consideration of our comments on this important issue and your work to ensure sustainability in the IFQ fishery.

Michelle Norvell

Michelle Norvell
Executive Director, FBGA
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Agenda Item I.6 - Blackgill-Slope Complex Final Reallocation and Accumulation Limits

Madame Chair, Members of the Council –

The Half Moon Bay Commercial Fisheries Trust is a brand new non-profit entity created in Half Moon Bay to support a thriving and resilient port community and fishing economy built on independent fishing businesses delivering sustainably-caught premium seafood.

One key objective of the organization is to maintain and expand access to our community's traditional fisheries through a quota banking system that will anchor access to groundfish in our community.

Entities such as ours, which are being created up and down the coast to support fishermen and fishing communities, rely on stable and sustainable fisheries for business planning.

Actions on reallocation to IFQ fishery species such as the current agenda item to potentially remove Blackgill rockfish from the Slope Rockfish complex and/or to reallocate slope rockfish or Blackgill rockfish quota can undermine the economic stability of the fishery. Continually changing quota portfolios make it difficult to plan and execute fishing businesses in the IFQ program, which is already complex and expensive to operate in.

Any action on this agenda item would further set a precedent that the Council will reconsider decisions already made through a difficult allocation process without a conservation reason to do so. Furthermore, we believe any action on this item likely does not fulfill the specific purposes of "providing greater resource protection while *minimizing disruption of current fisheries*" and ensuring "an *equitable allocation* of the harvestable surplus of blackgill"

Therefore on behalf of the commercial fishermen, and the community of Half Moon Bay and surrounding areas that we are dedicated to serving, we ask that no Council action be taken on the blackgill issue at this time.

Sincerely-

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Half Moon Bay Commercial Fisheries Trust

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Agenda Item I.6 - Blackgill-Slope Complex Final Reallocation and Accumulation Limits

Madame Chair, Members of the Council –

The Half Moon Bay Groundfish Marketing Association is an association of groundfish fishermen fishing out of Half Moon Bay, California. We are also participants in the California Groundfish Collective partnering with Central California Seafood Marketing Association, Fort Bragg Groundfish Association and The Nature Conservancy.

We are writing this letter to advise that any action to remove Blackgill rockfish from the Slope Rockfish complex and/or to reallocate slope rockfish or Blackgill rockfish quota would be devastating to our members and other fishing operations in California that operate in the IFQ fishery South of 40'10. Blackgill is primarily harvested by vessels south of 40'10 and is an important species for the entire IFQ fleet, fixed gear, seine and trawl operations.

Members of the Half Moon Bay Groundfish Marketing Association represent some of the few remaining successful groundfish operations south of 40'10. These fishermen have been stewards of the ocean, and have greatly changed their behaviors on the water to comply with the regulations associated with IFQ, including fishing under 100% accountability since the implementation of the program. These fishermen have incurred great costs and responsibilities for the program, under which they have continued to try to adapt to survive. They have also committed themselves to advocating for the success of the program, and the history and behavior of our members exemplifies this.

We believe that reallocation discussions such as these create an environment of instability in an already precariously sustainable fishery. Creating continual uncertainty within the fishery is detrimental not only to the success of our local fishermen in Half Moon Bay, but also to the success of the entire program.

There is no immediate conservation issue requiring reduced harvest of blackgill by the trawl sector, therefore we respectfully ask for no action on this item.

Sincerely-

Geoff Bettencourt
IFQ Fisherman, President of Half Moon Bay Groundfish Marketing Association