



Agenda Item G.3.b
Public Comment
March 2016

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Or 97221

RE: G.3.b. Biennial Harvest Specifications and Management Measures for 2017-2018
Groundfish Fisheries

February 8, 2016

Dear Chair Lowman & Council Members

Please accept these comments on the 2017-2018 groundfish specifications on behalf of Midwater Trawlers Cooperative (MTC) and United Catcher Boats (UCB). MTC and UCB collectively represent the majority of catcher vessels that participate in the at-sea and shoreside sectors of the Pacific whiting fishery.

We write today to urge you to retain the MS transfer Concept in the mix of new management measures currently being analyzed in the 2017-2018 specifications process. We believe that the analysis for this management measure is straightforward and inclusion of this new management measure will not threaten the January 1st, 2017 implementation date for the new specifications regulations. Additionally, we appreciate the offers of staff assistance made by Oregon Department of Fish and Wildlife (ODFW) and Washington Department of Fish and Wildlife (WDFW) Council representatives during the November PFMC discussion that would further reduce the analytical burden on the Council and/or agency staff. Lastly, we believe this new management measure is necessary in order to provide the MS fishery with a reasonable expectation of achieving optimum yield, which is currently threatened due to overly constraining bycatch amounts available to this sector to prosecute the target fishery. Accordingly, we believe this concept should be given a high priority within the list of new management measures currently being considered.

At the November PFMC meeting a majority of Council members voted to include a new management measure developed and proposed by our organizations as a way to mitigate the impacts of exceedingly constraining small bycatch amounts available to the mothership sector of the whiting fishery. To help alleviate this problem and

avoid premature closures like the one that occurred in 2014, the mothership sector developed a concept that allows voluntary limited transfers of the four choke species (Canary, Darkblotched, and Widow rockfish and Pacific Ocean Perch) from mothership participants' shoreside IQ accounts to the at-sea whiting cooperative on an annual basis. In this way the mothership participants are essentially solving their problem with "their own" fish that was allocated to them through the distribution of buyback-associated species for which they are paying for through buyback loan payments. Current regulations prohibit Whiting permit holders/vessel owners to transfer some portion of their Shoreside IQ species to their Mothership Whiting fishery.

In developing this shoreside to mothership choke species proposal, we wanted to insure that there would be no negative impact on the shoreside fisheries (both Whiting and non-Whiting). Since implementation of the ITQ program large amounts of choke species are left unused in the shoreside fishery and this request would still leave ample amounts of fish in the shoreside sector.

Representatives from MTC and UCB have been in contact with Council staff between the November meeting and now, responding to questions and informational requests related to this concept. We are available to continue this dialog and provide any additional information or materials requested.

Thank you for your consideration and continued dedication to sound management of the west coast groundfish fisheries.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Brent C. Paine".

Brent Paine
United Catcher Boats

A handwritten signature in cursive script that reads "Heather Mann".

Heather Mann
Midwater Trawlers Cooperative



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Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101 Portland, Oregon 97220-1384

February 8, 2016

Dear Chair Lowman,

The Sportfishing Association of California (SAC) is a non-profit organization whose membership includes the majority of the commercial passenger fishing vessels (CPFV) in southern California.

The purpose of this letter is to recommend an increase in the authorized depth for recreational angling in the Rockfish Conservation Area (RCA) from 60 fathoms to 75 fathoms. This includes the areas off the mainland coast from Point Conception to the Mexican border, as well as the coastal islands and offshore seamounts.

The following points support this recommendation:

- Southern Management Area RCAs were initially created to reduce the take of bocaccio and lingcod. Both stocks are now considered healthy. These species are routinely targeted in 35-60 fathoms. The proposed action will serve to reduce the impact of fishing on these coastal stocks by distributing fishing pressure to a larger area.
- The proposed action will benefit recreational anglers fishing adjacent to the islands and coastal shelf of southern California while highlighting the successful and positive efforts made by the Council, NFMS, and the California Department Fish and Wildlife (CDFW) to rebuild rockfish stocks in southern California.
- SAC favors access to a depth of 75 fathoms over a modification in bag or trip limits for bocaccio. An increase in fishing opportunity that targets healthy stocks and reduces compaction of fleets is a priority.
- Recreational fleets continue to expand their use of descending device technology and therefore post-release mortality for certain species has been reduced.
- The proposed action will allow for improved access to additional shelf dwelling fish stocks, such as widow rockfish and chilipepper rockfish. These species are rarely available in depths shallower than 60 fathoms.
- For recreational fisheries, access to greater depths will reduce crowding in inshore areas and may allow anglers to target higher-quality or bigger fish within existing bag limits - three higher-quality, larger bocaccio is substantially preferred over four lower-quality, smaller fish.

SAC appreciates the opportunity to provide input, and is grateful for the valuable work conducted by the Council to responsibly manage marine fisheries resources.

Sincerely,
Ken Franke, SAC President

Pacific Fisheries Management Council

February 2, 2016

Alan Alward
1253 Bolton Dr.
Morro Bay, CA 93442

Subject: Public comment on southern open access/limited entry A permit allocation

Dear Council member,

I am a commercial fisherman who tries to fish two thirds of the year in the open access groundfish fishery near Morro Bay, CA. My main fishery is albacore, predominantly off the coast of Oregon during the summer and late fall. I am also a director of the Morro Bay Commercial Fishermen's Organization and I sit as a representative of that organization on the City of Morro Bay's Harbor Advisory Board.

It comes to my attention that the council is considering shifting allocations from open access to the limited entry A permit portions of the southern management area. Please excuse me if I don't know the exact terms for this issue. There are a couple of facts that I would like to point out that I feel might be pertinent to this issue.

The open access program provides a much needed opportunity for fishermen to supplement their incomes from other fisheries and allows them to continue to operate their boats during times when other fisheries they participate in are closed or having cyclical problems. Every year I encounter a serious problem that involves my dwindling bank account. I cannot make it from the end of one tuna season to the beginning of the next on my income from tuna alone. While the open access allocation does not allow me make enough money to keep me solvent if I chose to do that year-round, it does allow me to keep up with the cost of maintaining a 57 foot boat and pays for many household expenses during my off season. It is essential to my survival as a viable commercial fisherman. I have also found that if I just fish tuna during July, August, September and October, by the time June rolls around I have forgotten which end of the boat goes forwards! Problems often accumulate in boats that sit idle for months at a time that are noticed and corrected in boats that fish on a more regular basis. The trend of fisheries management over the years has been to herd fishermen into limit access programs. The outcome of that trend is that fishermen run a great risk of complete failure if their limited access fishery takes a cyclical downturn.

While I am sure the A permit fishery participants look over the fence at open access at times and say: "They didn't use all of their quota and we could sure use it." There are good reasons not to shift quota from open access quota away to any other segment of the fishery. First and foremost: If the open access quota is not being fully used at this time it is because it is set so low that many fishermen feel it is not worth the trouble. In my own case I find that I have averaged about \$2.00 a pound for a couple of years now. This means that over a two month period I would gross about \$6400 under the present allocation, if I am able to get all of my 3200 pounds of quota. Subtract from this the operating costs of fuel, bait and ice, and you would find that I am taking home about \$2500 a month, if I am lucky. Yes, I am desperate enough to be glad to have that opportunity. If other fishermen are not currently that desperate, then I think any forward looking person can see many of them will shortly become so with the prospects of the California crab fishery and the upcoming California salmon season. It seems to me that the Council might even consider shifting allocation into the open access program to support the coming dire plight of a great many southern West Coast fishermen.

In summary I urge you to keep the situation of the average fisherman in mind and support the unique and desperately needed function that open access serves in the larger fishing community.

Respectfully, Alan Alward