



Commercial Fishermen of Santa Barbara, Inc. 6 Harbor Way, #155 Santa Barbara, CA
93109 www.cfsb.info

Mr. William Stelle

April 1, 2016

NMFS Regional Administrator

7600 Sand Point Way NE,

Seattle WA 98115-0070

Attn: Jamie Goen

Re: Review of Trawl Rationalization Program

Dear Mr. Stelle:

I am writing on behalf of the Commercial Fishermen of Santa Barbara and the small boat limited entry longliners fishing the waters of the Pt Conception Management Area. I am a participant in this limited entry longline fishery.

The purpose of this letter is to inform you and the Pacific Fisheries Management Council of the huge negative impacts the Trawl Rationalization Program has had on our small boat limited entry fleet. Here are some of the ways the Trawl Catch Share Program has impacted:

The program has created a new fishery in our area. South of the 34 27 there was never a groundfish trawl fishery for black cod. The majority of the black cod fishery habitat was untrawlable due to its extremely rocky nature. One could say there was a de facto closure outside the 600f line. By allowing gear switching to traps and the programs ITQ

consolidation, a huge impact has occurred in our area south of PT Conception, where there was no impact before.

The trawlers were allowed to fish on a bi monthly basis as we are doing now. The ITQ trap boats come down and fish 24/7 for a short period of time with unlimited gear and can negatively impact an area with such intensive fishing that it can take years to rebound. This super concentrated fishing style seems at best an extremely poor management technique.

These over 50' boats typically set 6 strings of gear. Each string consists 30 – 50 traps and is approximately 2 miles long. This gear footprint can easily be 20 linear miles. These boats are capable of carrying only 2 strings of gear so each time they go in to unload they can get another 2 sets of gear. Along with the significant impact on the resource this huge footprint totally excludes us from fishing the same area. We have attempted several times to establish a communication line to establish where their gear is but have not succeeded.

When the program was introduced the different trawl species were separated out and dealt with individually. Before this, the trawl boats had many options for fishing and could do so as the markets and resource dictated. When these different species were separated out and sold to different entities the fact that these entities had to invest substantially created an artificial condition that didn't exist before ITQ. With the substantial investment these ITQ boats were forced to fish this quota. Even if the resource or market suggested that it would be better to concentrate on another species the ITQ boats don't have that option because of their huge financial commitments. As the resource fluctuated this ability to switch to another species was a safety valve that doesn't exist now.

With the implementation of the trawl ITQ program came fees and conditions to pay for the program, the buy back and ground truth (observers). While these fees and conditions make it more difficult for the quota consolidators they make it absolutely uneconomical and totally prohibitive for our small boat (<38') fleet. The size of our boats limits the amount of gear and fish we can hold. We cannot re-bait on the grounds. After traveling 60 miles we get one set and have to return home. We don't have room for an observer. Basically we are totally prohibited from participation in any aspect of this program because of these economic constraints.

The Catch Share Program was based on the concept of "The Tragedy of the Commons" where a set area was no longer used for common use and separated into areas where people could, through ownership, take care of their plot and not overgraze it. By allowing

these out of state, non-owner operated, huge ITQ boats to consolidate quota and take over an area you have created the exact “Tragedy” that catch shares was meant to avoid. We are asking you to take responsibility for this unforeseen tragic outcome and do something about it.

RECOMMENDATIONS:

From our small boat point of view the obvious solution would be to do away with the trawl program and put it back the way it was. Politically that probably isn't a possibility. The bulk of the quota in this program came from above the 34 27 line. (North of Pt Conception). Find a way to mitigate that for the fishermen South of that line (Pt Conception Management Zone) as the bulk of the trawl quota catch has now been coming from this southern area.

Require the trap boats to take all their gear in when they unload.

Also put a trap limit (one boatload worth) on all trap boats. This is a must do.

Work with the small boats to find a way to give them affordable access to the program. Please note that the concept of having a modeler determine the TAC and then caring only that the TAC is met and not caring how the TAC is extracted is a biologically and socially irresponsible management technique.

Realize that this program is absolutely ruining our local groundfish community. The status quo is not acceptable.

CONCLUSION

This outcome of this program is not in the spirit of the Magnuson-Stevens Act. There have been many unforeseen consequences of this Groundfish Trawl Catch Share Program. The purpose of this review is to quantify those consequences and do something about them. Please do that. Also do not hesitate to contact me regarding any of the issues discussed above.

Sincerely,

John Colgate

Vice President CFSB

August 21, 2016

Comments for trawl ITQ gear switching.

Dear Mr. Chairman Pollard and fellow Council members,

Thank you for the opportunity to comment on this important topic.

First let me state that I hold a west coast fixed gear ground fish A permit with Longline endorsement.

I would also like to state that I support responsible trawl fishing and believe that it is the most effective and sometime the only viable method to catch certain species of ground fish. Converting trawl boats to trap boats requires more thought and precaution. It is not the silver bullet our environmental friends would have us believe.

I am very concerned about the adverse impact that the Trawl ITQ gear switching has had on the fixed gear longline and pot fishery south of Point Conception where I fish.

Allowing only one fishery sector (trawling) to gear switch is unfair to other gear types for the following reasons.

1. No other sector is able or permitted to switch gears to compete on a level playing field. If you allow trawlers to switch to trap gear so they can access a species of fish which they previously did not catch in the area south of Point Conception with trawl gear like black cod, you are stealing opportunity away from the fixed gear sector and from me. The original purpose of limited entry in the west coast ground fish fishery was fair and equitable allocation of a limited resource. The groundfish trawl fishery south of Point Conception historically was primarily a flatfish fishery not a blackcod fishery.
2. ITQ gear switching has concentrated large amounts of new fixed gear pot effort into the Conception management area. This is bad

for the sustainability objectives that the limited entry program was designed to address.

3. How may LE fixed gear permits, endorsed for pots made significant landings of black cod south of Point Conception prior to the gear switching ITQ program? Gear switching has disrupted a once orderly run black cod fishery. It has turned it into a derby style race for the fish with long liners unable to compete with pot gear deployed by larger trawl boats that have substantially higher overhead costs. These boats can mop up large volumes of fish very rapidly. Is this not what we are trying to avoid? Is it fair to restrain long liners using less efficient gear with low by-monthly quotas while you reward gear switchers with the ability to catch an entire years catch on the same fishing grounds in a week or two?
4. If one gear type is good and another bad, are you not punishing the wrong gear type by disenfranchising the users of the good?

Recommendations

1. End the gears switching program and return the trawl boats to trawl gear fishing.
2. If you will not end the gear switching program, allow all gear types to switch to any gear they prefer and allow them to catch 6 bi-monthly quotas in one month.
3. If you will not select one of the two options above, constrain the gear switchers to bimonthly quotas equal to 1/6 of their ITQ.

Remember, ITQ stands for individual transferable quota not individual transferable gear switching. If gear switching is good it should be good for all gear types not just trawling.

Your gear switching has failed not only long liners it has failed pot endorsed fix gear as well. The gear switching program dilutes the profitability of fixed gear fishermen. It is unfair.

Respectfully,
Chris Hoeflinger