



June 8, 2018

Dear Pacific Fishery Management Council:

The California Groundfish Collective (CGC) is comprised of members from the ports of Fort Bragg, Half Moon Bay, and Morro Bay, and since 2011 has proven successful in maintaining a low utilization rate of overfished species through a risk pooling approach in the West Coast IFQ Groundfish system. Members of the California Groundfish Collective pride themselves in being pragmatic, solutions-oriented fishing community members committed to creating healthier oceans and better, more productive fisheries.

It is in that spirit that we are writing to bring your attention to a concern that is unique to our California ports South of the 40° 10' management line. Our region is the only area where Cowcod (*Sebastes levis*) are encountered and managed as an individual IFQ species. As we work to rebuild the groundfish fishery in small California ports, we are finding fishing opportunities for target species such as Chillipepper rockfish to be constrained by the overfished species vessel limit of 546 lbs. of Cowcod. This is particularly an issue in Half Moon Bay and Morro Bay where two new trawl operations have begun operating since 2017, and where more Cowcod are typically found than in Fort Bragg.

This concern that we were operating under a constraining vessel cap that was calculated using outdated scientific information was raised at the Community Advisory Board meetings and it was discussed when prioritizing recommendations for follow on actions as part of the 5-year review process. However, the decision at the time was that the situation affected such a small group of vessels and would rectify itself through the expected near-term rebuilding of the Cowcod population. The expectation was that by the time the issue made its way through the Council process that the vessel limits for Cowcod and likely the TAC would be adjusted based on the new science that projects the species to be rebuilt in 2019. This still seems relatively reasonable, and we are grateful that a long-term solution to this issue is on the horizon.

Our fears are that between now and the time that Council action catches up with the projected rebuilding, that our California fishing businesses, and the groundfish fishery as a whole in California South of the 40° 10 management line could be irreparably damaged if one or more of our vessels were to have a lightning strike and be forced out of the fishery.

We are not quite at this point yet but want to bring to your attention this very real risk facing California fishermen. Fishermen of the CGC continue to operate under voluntary conservation fishery management plans that include detailed special plans with zoned risk mitigation behaviors such as 30-minute test tows in areas where Cowcod and Yelloweye may be encountered, and voluntary closures of high risk areas. Since, 2011 the CGC has averaged annual harvests of 376lbs of Cowcod for all vessels participating in the CGC (typically between 4 and 6 vessels). However, thus far in 2018 the CGC vessels have collectively

encountered 387 lbs. with 6 months left to go in the fishery. We believe this increase in Cowcod harvest is likely due to an increased abundance of Cowcod as they rebuild.

We want to bring this information to your attention and ensure you are aware of scenarios in which the current Cowcod vessel limit could become increasingly constraining to businesses rebuilding the groundfish fishery in California. We are open to working with the Council and NMFS to find interim solutions to keep our fishermen on the water and hope that the Council would be supportive of this as well.

Sincerely,

A handwritten signature in black ink, consisting of a large, fluid, looping stroke that starts with a small circle and ends with a long, sweeping tail.

Michelle Norvell, Project Manager  
Fort Bragg Groundfish Association

A handwritten signature in black ink, featuring a large, stylized 'L' and 'D' that are interconnected, with a long, sweeping tail.

Lisa Damrosch, Executive Director  
Half Moon Bay Groundfish Marketing Association