

JEFF FARVER

RC 081

From: **S Hackleman** <stevenwhl@yahoo.com>
Date: Fri, May 23, 2014 at 9:20 PM
Subject: PFMC June 2014 meeting comments
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Dear Madam Chair and Council members,

It has been brought to our attention that there has been concern about the status of Conception area sablefish. We are part of about 40 longline permit holders who call this area home, and southern sablefish are a very important component of our livelihoods as groundfish fishermen in California. We are concerned about the new concentrations of intense single species fishing effort by large, out of town, trap vessels, fishing trawl IFQ close to our home ports that now threatens an existing stable LEP sector. Most of us fish in boats less than 40 feet in length with hand baited artisanal longline gear. We are proud, providing fresh sablefish and other groundfish to California residents for over three decades. Large vessels are now targeting Conception area sablefish in traditional fishing areas of our small longline operations. We are concerned about the extremely high rate of harvest, significant amounts of abandoned trap gear, and nearly exclusive targeting of the spawning female biomass by these large vessels fishing under the trawl IFQ program. We feel that these new operations are in stark contrast to the historic nature of the trawl fishery of Conception area sablefish, and changes should be considered to protect the livelihoods of our small town fishing fleets and the associated fishing infrastructure in our homeport communities.

Beginning in 2011, large trap vessels from as far as Alaska began flocking to central and southern California to take advantage of the gear switching provision of the new trawl IFQ program and excellent markets for frozen sablefish exported to Asia emerging in 2011. These vessels, each with hundreds of sablefish traps, began inundating our traditional fishing areas with massive amounts of trap gear, harvesting Conception area sablefish at staggering rates. Markets for exported frozen sablefish have fluctuated over the past few years, but they are again becoming stronger and we are concerned about massive effort by these large IFQ vessels displacing our small vessels that are limited to areas close to port. As recently as this year, landings close to 100,000 pounds in a single month have been relatively common by IFQ boats. These vessels far exceed historic levels of take by the trawl fleet in central California, which had catch limits exceeding 15,000 pounds in a single two month period. This fast extraction has had devastating effects on some of our local fishing grounds. Each line of traps set by these large vessels is one to three miles long and each vessel sets four to eight of these sets. These traps are often kept in the same areas, often close to our harbors, for several weeks or even months, forcing those of us in small vessels to venture farther from port to avoid losing our longlines by tangling with traps, putting us in more danger from inclement weather. This practice has effectively closed off many miles of prime fishing areas close to port for weeks or even months at a time. This fast rate of harvest also devastates the fishing in these areas, leading to declines in CPUE for many months after.

Each two mile set of trap gear lost off our coast results in another area small scale longliners cannot fish due to risk of snagged and lost lines. Traps are normally left unattended at sea while returning to port to unload fish, often in areas of high ship traffic. Miles of heavy rope with traps have been lost in Conception area sablefish habitat off our coasts every year since 2011, leaving more and more area littered with derelict traps, which make it impossible for us to

return to fish these spots with our lighter longlines without losing them on the traps and rope. Although these big boats have considerable range and ability to withstand rough weather conditions, they have fished close to Morro Bay and Santa Barbara with very few exceptions, leaving lost gear in traditional fishing areas close to these ports. Requiring all traps to be retrieved before returning to port and considering trap limits for each vessel could help to reduce gear loss by the new IFQ trap fishery.

We are also deeply concerned about the nearly exclusive targeting of the large mature females by these vessels, which fetch a much higher price than averaged sized male sablefish. Traps are fished in deep water with large escape rings, which allow all but the large female fish to escape. The importance of the spawning females to the future of the sablefish fishery is made very clear in the 2011 stock assessment. We think it would be prudent to limit the maximum size of escape rings used in sablefish traps, and special consideration given to the change in sizes of sablefish harvested by the trawl fleet since the beginning of the IFQ program began, to prevent over harvest of the spawning female biomass by new trap boats.

Rates of sablefish harvest by the fixed gear trawl sector should reflect the historic nature of that fishery. Trap limits and requiring sablefish gear to be more closely attended to can help protect our local waters from derelict fishing gear, and the local fishing communities that rely on these fishing areas. These steps are being considered as limitations for considering allowing sablefish traps in Alaska by the North Pacific Fisheries Management Council, and we believe they deserve consideration for Conception area sablefish as well. In light of the 2011 stock assessment, the importance of the spawning female biomass for west coast sablefish cannot be overstated, and we believe the use of large escape rings to exclusively target large female sablefish is not acceptable for the long-term future of the fishery.

Many of us have grown up fishing these waters and we all feel a strong sense of stewardship for our local resources, as they allow us to provide for our families and at the same time provide an economic benefit to our local homeport fishing communities and associated infrastructure. Please consider our concerns for our fishery and the jobs and high quality seafood it provides for thousands of Californians.

Sincerely,

Owen Hackleman
(FV Provision/GFO633)

Steve Hackleman
(FV Ruth Anne II/GFO377)

Roger Cullen
(FV Dorado/GFO388)



Commercial Fishermen of Santa Barbara

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

November 4, 2014

RE: Gear conflict between IFQ trap boats and Southern CA. LE
longline community

Madam Chair and Pacific Fisheries Management Council Members:

My name is John Colgate. I am speaking to you as Vice President of CFSB and am representing the LE longline fleet of the Pt Conception management area. I have been a full time commercial fisherman for the last 42 years.

The purpose of this letter is to bring you up to date on the escalating gear conflict between the visiting IFQ trap boats and our LE longline community.

Over the last 2 months these visiting trap boats have started targeting the areas the longline community fish, the 400f to 600f depth range. The major conflict arises when these trap boats leave these areas, they also leave their miles long strings of gear in the area. The location of this unattended gear is unknown. It is often right in the middle of our fishing grounds.

This situation happened to me last month. I had been fishing an area and was seen there by one of the trap boat. After I left to unload, the next day the trap boat moved into the area and worked that area for several days. When I came back to fish my area, just before I was about to set, another longline boat from my home port called to say he just found a string of unattended gear ½ mile from me. What we figured out was when the trap boat left they left approximately 3 strings of gear, over 6 miles of gear, right through the middle of this area effectively blocking me from setting my area. If I hadn't inadvertently found this out I would have set over their gear creating an



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extremely dangerous situation for myself and my crew if we had gotten entangled with it. This unacceptable risk is what I am here to talk to you about.

This was not an isolated incident. This has also happened to several of my fellow fishermen. Fortunately no one has gotten tangled with this gearyet.

Our LE fishing community feels this dangerous situation is something that must be delt with immediately. With the slightest amount of wind this unattended gear is invisible on our radars.

I would like to formally ask you to put this matter on the council's agenda to be discussed in closer detail as soon as possible. We request that these trap boats be required to return with all their gear to port when they unload.

Thank you for this opportunity to express our community's views. We have a desire to work out a compromise on this issue. If you have any further questions you may contact me at the above address.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Colgate', written over a horizontal line.

John Colgate
Vise President CFSB