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March 19, 2021

Mr. Marc Gorelnik, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Re: F.3. Scoping of Prioritized Non-trawl Sector Area Management Measures

Dear Chair Gorelnik and Council members,

The Pacific Coast Federation of Fishermen's Associations is pleased to offer the following comments in support of an industry led proposed analysis expanding access into the non-trawl RCA for the Open Access (OA) Sector for California and Oregon's commercial small vessel fleet(s).

We offered [comments during your November 2020](#) meeting which highlighted the importance of the open access fishery as a bridge for fishermen participating in the dungeness crab and salmon fisheries. That is even more true today given the poor commercial dungeness crab season(s) and the greatly reduced opportunity envisioned for the 2021 commercial salmon season(s). It is not hyperbole to claim that many small businesses will be needing additional opportunities to keep afloat.

As we noted in our November comment, "[t]he Open Access fishery is critical to the ongoing health of our membership and the port and harbors in which we operate. This fishery allows us to provide the highest quality product to our local communities. Additionally, Open Access fisheries typically result in a higher ex-vessel price - benefiting our small businesses, the businesses which are dependent on our operations (local processors, fuel docks, offloading stations, ice houses, etc), our local communities, and our ports and harbors.

Thank you.

Mike Conroy
Executive Director

PROPOSED ANALYSIS EXPANDING ACCESS INTO THE NON-TRAWL RCA OPEN ACCESS (OA) SECTOR FOR CA AND OR'S COMMERCIAL SMALL VESSEL FLEET

This proposal requests the Council to direct effort to analyzing and scoping increased access into the non-trawl RCA for small commercial vessels. The specific area for the proposed analysis is central to northern Oregon, e.g. the Washington/Oregon border to Point Conception: (latitude 46.16N south to 34.27N). The fundamental cornerstone is limiting fishing methods to non-bottom contact fishing methods. Our point of reference is the recent and current EFP method's historical data which target abundant mid-water groundfish, such as those explored under the Emely/Platt vertical jig and the Real Good Fish (Lovewell) EFPs. We ask that the proposed analysis includes moving the fishery being tested under those EFPs into regulation with some minor considerations.

Purpose and Need:

A bridging fishery is desperately needed for the small vessel fleet which can help sustain their small businesses without incurring exorbitant costs in permitting and gear.

The small boat commercial fleet is nearing a critical juncture where the financial viability of fishing as a profession can no longer be sustained. Recently adopted regulations incorporating measures to address abnormally high numbers of whale entanglements during the Blob and recent monster El Nino and domoic acid levels over the past five years, have reduced the duration of the CA and OR crab seasons by roughly 35-40 percent. Ocean salmon seasons for the Klamath and Sacramento Fall Run Chinook Salmon have not realized their full potential for at least a decade; and there is little expectation that will change any time soon. Increasing trip limits for the Open Access fishery is making this a more attractive opportunity for younger fishermen and those looking to bridge the crab and salmon season(s).

We have no specific information on the amount of effort which would be expended in this fishery; but early estimates based on informal fishermen association surveys of nine CA ports north of Point Conception found, on average, 5 vessels from each port may invest in and sustainably pursue opportunities in the expanded open OA non-trawl RCA. Thus, the rough estimate is about 45 vessels in nine northern/central CA ports will actively pursue OA in the currently established non-trawl RCA once restrictions are relaxed. ***These are the vessels which will actively pursue alternative high value markets and non-traditional supply chain approaches to maximize profit potential.***

A. Scope:

Purposed Analysis:

In November, we also suggested the possibility of exploring elimination of the RCAs. While we believe that conversation is an important one, we limit our current proposal to expedite the process. We propose the OA non-trawl RCA within waters off California north of Pt Conception (34.27N) be 50 fathoms shore side out to 125 fathoms ocean side north to Pt Arena (latitude 38.57.5N). Pt Arena north be 40 fathoms shore side out to 125 fathoms ocean side north to Cape Mendocino (latitude 40.10N). We propose north of 40.10N to 46.16N (WA/OR border) the near shore boundary should be 30 fathoms shore side out to 100 fathoms ocean side.

We feel this management approach provides:

- The best opportunity to access the resource;
- Develop a sustainable and reliable market of high-quality hook-and-line caught groundfish;
- Provides the highest quality domestically sourced product not readily available to the public at-large; and
- Maintains an area of refuge which promotes protection of species age classes assuring perpetuation of rebuilt stocks.

Gear Restriction:

Suitable non-bottom contact gear types that target midwater groundfish stocks while avoiding contact with sensitive benthic habitat(s) and overfished groundfish stocks include rod and reel, clapper reel, and salmon gurdies. This list is not exclusive; and is meant to highlight the ability to ensure a lack of contact with the bottom. Methods that would not be allowed to be used in the RCA are longline, pots, and dinglebar.