



## Six-Pack Charter Operators of Brookings, Oregon

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Nov 29, 2019

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Dear Commission Members,

We are writing concerning the 2020 recreational groundfish regulations that will be adopted at the December Oregon Fish and Wildlife Commission meeting. Our group represents six-pack charter operators on the Southern Oregon Coast, but also advocates for private boaters fishing Brookings and Gold Beach.

While we feel a larger rockfish limit with a sub-bag-limit of black rockfish is the most effective management tool to maximize angler opportunity and stay within the federally approved groundfish allocations, we also understand ODFW's concerns about release mortality. However, ODFW data in this year's staff report clearly shows the daily overall rockfish bag limit could be increased for the entire season and still keep recreational anglers within the harvest guideline for black rockfish.

As charter operators, we appreciate the challenge ODFW and the commission face in managing the groundfish season, with nearly 50 different species and harvest guidelines determined by the federal government. We also feel the bag limit could be increased during the slower shoulder season and still keep harvest of black rockfish to an acceptable level, ensuring the sustainability of the fishery and resource.

ODFW is proposing a status-quo bag limit of five rockfish. For 2019, sport anglers (private and charter) used only 80-percent of the federally allowed black rockfish allocation, 20-percent of the blue and deacon rockfish, and 52-percent of the canary rockfish allowable harvest. In 2018, anglers used 76-percent of the black allocation, leaving nearly 100 MT unharvested.

For 2020, under the status-quo regulations, ODFW projects black rockfish harvest will be 90-percent of the harvest guideline. With a 6-fish limit, harvest would be 94-percent, and at 7-fish it would be 99-percent.

**Table 4. 2020 bag limit alternatives with projected impacts on black rockfish.**

2020 bag limit	Projected black rockfish total impacts, mt	Percent of black rockfish HG (HG=389 mt)
5 fish	351	90%
6 fish	367	94%
7 fish	384	99%

*Figure 1 Source: ODFW*

We strongly feel the total limit of rockfish could be 6 fish from January-May, 5 fish June-August, and 6 fish September-December and the harvest will be well within the allocation set by the PFMC (see figure 1). The bulk of the effort takes place in August, with Memorial Day through Labor Day the busy season. ODFW staff has stated effort and catches from October through April are minimal compared to the rest of the year. It is likely we could even fish the entire season with a six-fish limit and still remain under the harvest guideline.

This small increase in rockfish bag limits during the beginning and end of the season will allow charter operators to more effectively market trips during the shoulder season, and also give local sport anglers a chance to put a few more fish in their freezers, offsetting rising fuel, moorage and other costs associated with fishing on the Oregon Coast. It makes a trip to Brookings or Garibaldi more appealing for the inland angler towing a boat to the coast for the weekend. It increases economic activity for the coast during a generally slow time of the year for tourism, and still keeps ODFW in compliance for federal groundfish allocations. Data shows the larger limit could be justified the entire season, but keeping it status quo during the summer months adds an additional buffer against higher-than-expected harvest.

Also, please be aware, charters on the Southern Oregon Coast headed advice from the 2017 commission meeting and have taken steps to reduce excessive harvest of black rockfish. We typically do not keep crew limits of black rockfish. We also try to bring in a variety of fish other than black rockfish, often encouraging anglers to keep blue, deacon and canary rockfish as they catch them to avoid limits of just black rockfish. A review of the catch sampling by ODFW will confirm this.

Thank you for your consideration.

Sincerely,

**Capt. Andy Martin**, Brookings Fishing Charters  
**Capt. Mike Brouillette**, Old Dog Sportfishing  
**Capt. Travis Sallander**, Brookings Fishing Charters

**Capt. Rye Phillips**, Fishing with Rye  
**Capt. Clarence Cole**, Fishin' Trips Charters  
**Capt. Shane Brooks**, Brookings Fishing Charters