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Board of Supervisors
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September 6, 2023

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Written Comments Submitted with Oral Testimony from Supervisor Chris Howard

Re: September 2023 Council Meeting, Harvest Specifications Technical Corrections and In-Season Adjustments (Agenda Item G8)

To Whom It May Concern:

As you are likely aware, the California Department of Fish and Wildlife (CDFW), under emergency closure authority granted by the California Fish and Game Commission, closed the 50 fathom Rockfish Conservation Area in order to protect a single species, the quillback rockfish, within Northern Groundfish Management Area (from Cape Mendocino north to the California/Oregon border). This closure became effective August 21, 2023. These comments are being provided in order to constructively address an underlying issue we believe that exists with how this decision was made as it is our strongly held view, based on information provided to this Board by local fisherman with knowledge of local reef structures and stock survey methods, that the underlying data collected prior to this closure was not complete and lacking in many regards. Our hope with these comments is to assist in avoiding unintentional socioeconomic damages to communities such as ours caused by poorly informed policy decisions, through recommendations for improved scientific methods and data collection.

As noted, it is our view that the data used to inform these policies contains significant gaps. Specifically, the data relies on trawling methods to estimate stock numbers despite trawling data for our region being either limited or non-existent due to the fact much of our nearshore waters cannot be trawled due to the nature of our reefs. As such, we are requesting that the PFMC request CDFW to conduct "Hook and Line Surveys", which will better target the nearshore fishery, rather than rely on incomplete trawling-derived data. We believe this is the only way to get the data needed to accurately estimate our nearshore stocks and allow for robust recommendations to the PFMC and to, ultimately, eliminate the perpetual cycle which CDFW has placed us in for more than just the quillback. In addition, as an interim measure, we would recommend a zero bag limit for the quillback rockfish, as well as potentially the China rockfish, which stocks are thought by many to be in the same state as the quillback.

It is our fear that the quillback is only one of a number of nearshore reef species which in the coming years will likely have in season curtailments or zero bag limits based on data being collected and reported by the Fisheries Science Center. We believe this will lead to a perpetual cycle of emergency closure(s) due to poor

data collection around the 30+ groundfish species on our nearshore reefs, which presents a significant emergency for our community as the impacts to our tourism based communities and commercial fleet are real and have been compounded by the preceding recreation and commercial salmon season closure.

Thank you for the opportunity to provide these comments. We look forward to being involved in future conversations for how best to move these issues forward in the best informed manner possible.

Respectfully,

A handwritten signature in blue ink, appearing to read "Darrin Short", written in a cursive style.

Darrin Short
Chairman

CC: Honorable Mike McGuire, Member of California State Senate
Honorable Jim Wood, Member of California State Assembly
Charlton Bonham, Director, California Department of Fish and Wildlife
Todd Phillips, Groundfish staff, Pacific Fishery Management Council