

# **Supplemental Correspondence**

## **Exhibit (G)**

**Public Correspondence received after  
November 22, 2019**

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.

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.

We strongly feel the total limit of rockfish could be 6 fish from January-April, 5 fish May-August, and 6 fish September-December and the harvest will be well within the allocation set by the PFMC. 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.

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 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.

Thank you for your consideration.

Sincerely,

Steve Huber  
530 623-0387  
[www.CrescentCityFishing.com](http://www.CrescentCityFishing.com)  
"Out of the Box"

**From:** [Michelle Tate](#)  
**To:** [April H Mack](#)  
**Subject:** FW: Letter for 2020 rockfish regulations  
**Date:** Wednesday, November 27, 2019 7:57:10 AM

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Ground Fish PC

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**From:** Leonard and Anna Krug <twokrugs@hotmail.com>  
**Sent:** Tuesday, November 26, 2019 6:16 PM  
**To:** odfw.commission@state.or.us; Maggie Sommer <maggie.sommer@state.or.us>; Dave Kuehn <peachykuehn60@gmail.com>  
**Subject:** Fwd: Letter for 2020 rockfish regulations

I believe that Andy Martins assessment of our proposed rockfish bag limits and harvest allocation makes sense.

I respectfully request that you extend his opinion the utmost consideration.

Gratefully,  
Leonard Krug  
Executive Director  
Oregon South Coast Fishermen  
541-659-0976

Sent from my iPhone

Begin forwarded message:

**From:** "Andy Martin, Brookings Fishing Charters LLC"  
<[wildriversfishing@yahoo.com](mailto:wildriversfishing@yahoo.com)>  
**Date:** November 26, 2019 at 1:51:51 PM PST  
**To:** Dave Kuehn <[peachykuehn60@gmail.com](mailto:peachykuehn60@gmail.com)>, Dave Strahan <[dstrahan@bigrocksports.com](mailto:dstrahan@bigrocksports.com)>, "Rep Smith D." <[rep.davidbrocksmith@oregonlegislature.gov](mailto:rep.davidbrocksmith@oregonlegislature.gov)>, STEVE HUBER <[steve@stevehuberguideservice.com](mailto:steve@stevehuberguideservice.com)>, 5starcharters Info <[info@5starcharters.com](mailto:info@5starcharters.com)>, Sharky's Charter's <[sharkyscharters@gmail.com](mailto:sharkyscharters@gmail.com)>, Mike Brouillette <[mikesbbq@kfalls.net](mailto:mikesbbq@kfalls.net)>, Kenny Priest <[kenny@fishingthenorthcoast.com](mailto:kenny@fishingthenorthcoast.com)>, Rye Phillips <[ryephillips12@gmail.com](mailto:ryephillips12@gmail.com)>, Winchesterbay Charters <[winchesterbaycharters@gmail.com](mailto:winchesterbaycharters@gmail.com)>, "[mikeysfishingadventures@yahoo.com](mailto:mikeysfishingadventures@yahoo.com)" <[mikeysfishingadventures@yahoo.com](mailto:mikeysfishingadventures@yahoo.com)>, Southern Oregon Anglers <[southernoregonanglers@gmail.com](mailto:southernoregonanglers@gmail.com)>, Wayne Butler <[prowlercharters@frontier.com](mailto:prowlercharters@frontier.com)>, Leonard and Anna Krug <[twokrugs@hotmail.com](mailto:twokrugs@hotmail.com)>, Bob Rees <[brees@pacifier.com](mailto:brees@pacifier.com)>, David Johnson <[fishermand@aol.com](mailto:fishermand@aol.com)>, "[nomadsfishing@comcast.net](mailto:nomadsfishing@comcast.net)" <[nomadsfishing@comcast.net](mailto:nomadsfishing@comcast.net)>, "[buzz@yakimabait.com](mailto:buzz@yakimabait.com)" <[buzz@yakimabait.com](mailto:buzz@yakimabait.com)>, "[exec@nsiafishing.org](mailto:exec@nsiafishing.org)" <[exec@nsiafishing.org](mailto:exec@nsiafishing.org)>, Robert Campbell <[rcampbell@fishermans-marine.com](mailto:rcampbell@fishermans-marine.com)>, "Rob G." <[basin\\_tackle@yahoo.com](mailto:basin_tackle@yahoo.com)>  
**Subject:** Letter for 2020 rockfish regulations  
**Reply-To:** "Andy Martin, Brookings Fishing Charters LLC"

[<wildriversfishing@yahoo.com>](mailto:wildriversfishing@yahoo.com)

Here is a draft of the letter I am writing regarding 2020 rockfish regulations. Please submit any feedback/concerns before the end of the day so I can get this sent in time to be included in the online and meeting location packets.

Thanks, Andy

November 27, 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.

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.

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We strongly feel the total limit of rockfish could be 6 fish from January-April, 5 fish May-August, and 6 fish September-December and the harvest will be well within the allocation set by the PFMC. 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.

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 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.

Thank you for your consideration.

Sincerely,

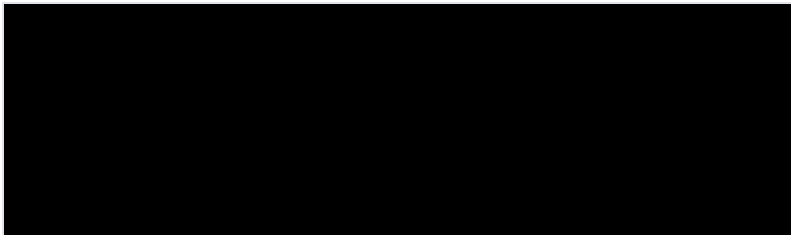
Capt. Andy Martin  
Capt. Rye Phillips

Capt. Mike Brouillette  
Capt. Travis Sallander

Brookings Fishing Charters With Rye      Old Dog Sportfishing  
Brookings Fishing Charters

Fishing

Capt. Andy Martin  
Brookings Fishing Charters LLC  
Wild Rivers Fishing  
(541) 813-1082 or (206) 388-8988 cell/text  
[www.brookingsfishing.com](http://www.brookingsfishing.com)  
[www.wilddriversfishing.com](http://www.wilddriversfishing.com)



**Brookings Fishing Charters | Daily Charters from the Port of Brookings**

The Premier Brookings fishing Charters on the Southern Oregon Coast. We offer daily fishing charters from the Po...

Check us out on Facebook

<https://www.facebook.com/brookingsfishingcharters/>

**From:** [April H Mack](#)  
**To:** [April H Mack](#)  
**Subject:** FW: Public comment for Dec. 6 meeting, Agenda item G  
**Date:** Monday, December 2, 2019 9:17:09 AM

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**From:** Coleman Tidwell <pozo02@msn.com>  
**Sent:** Friday, November 29, 2019 10:56 AM  
**To:** ODFW Commission <odfw.commission@state.or.us>; Andy Martin, Brookings Fishing Charters LLC <wilddriversfishing@yahoo.com>  
**Cc:** Curt Melcher <curt.melcher@state.or.us>  
**Subject:** Re: Public comment for Dec. 6 meeting, Agenda item G

I support Capt Martins letter.

Coleman Tidwell  
President  
Middle Rogue Steelheaders

"A democracy will cease to exist when you take away from those who are willing to work and give it to those who would not work." Thomas Jefferson

**From:** Andy Martin, Brookings Fishing Charters LLC <[wilddriversfishing@yahoo.com](mailto:wilddriversfishing@yahoo.com)>  
**Sent:** Friday, November 29, 2019 7:38 AM  
**To:** ODFW Commission <[odfw.commission@state.or.us](mailto:odfw.commission@state.or.us)>  
**Cc:** Curt Melcher <[curt.melcher@state.or.us](mailto:curt.melcher@state.or.us)>  
**Subject:** Public comment for Dec. 6 meeting, Agenda item G

Please include the following letter under the Exhibit G: 2020 Groundfish Fisheries public correspondence.  
Thank you,  
Andy

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Capt. Andy Martin  
Brookings Fishing Charters LLC  
Wild Rivers Fishing  
(541) 813-1082 or (206) 388-8988 cell/text  
[www.brookingsfishing.com](http://www.brookingsfishing.com)  
[www.wilddriversfishing.com](http://www.wilddriversfishing.com)  
Check us out on Facebook  
<https://www.facebook.com/brookingsfishingcharters/>

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## 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

Statement in opposition to raising (or eliminating) Black Rockfish Management Area daily trip limits

My name is Derek Barclay and I live in Corvallis Oregon. I consider my home port for recreational ocean fishing to be Newport. This port falls squarely within a BRMA (Cascade Head to Cape Perpetua), and thus is subject to a daily trip limit in the commercial nearshore black and blue rockfish fishery of 300 lbs/day, representing approximately 100 black rockfish. I intensely dislike the use of weight in managing the nearshore groundfish fishery, fish in the live fish fishery are counted by number and then a conversion factor is used, fish in the sport fishery are also counted by number and then converted to weight by a conversion factor. If, in dealing with other fishery management agencies, weight must be used, at least also list the actual number of fish it represents, since these are fish removed from the biomass of a particular species, and thus represent reproduction lost. Listing by weight obfuscates the actual impact on fish stocks.

I am listing below commercial landings for black rockfish by port group, and this listing is by number assuming an average black rockfish retained weighs 2.4 lbs/fish

Astoria:	1219
Bandon/Port Orford	53304
Charleston	391
Gearhardt/Seaside/ Cannon Beach/ Nehalem/Garibald	13656
Gold Beach/Brookings	28412
Netarts/Pacific City/ Siletz Rver/Salmon River/Depot Bay	11560
Newport	3705
Yachats/Florence/ Waldport/Winchester Bay	0*

\*This area of the Oregon coast has very little rocky reef structure and consequently this number may be correct

Notice Charleston and Newport, which are wholly within a BRMA have very low landing numbers in the commercial market. They also represent ports with intense sport fishing pressure, both from charter and private boats. Both have significant rocky reef areas attractive to black rockfish, and I have sport fished both ports, primarily Newport, for many years. My experience is that while Black rockfish are still fairly numerous in the Newport area, overall numbers have declined. Where once you might encounter acres of surface feeding black rockfish, now you encounter patches of that type of activity encompassing yards. I attribute this to past intense sport fishing, which is ongoing. However limitations on individual bag limits have decreased sport s pressure per participant/ although numbers of fishermen have increased. Recent years of fishing seem to indicate a smaller but stable number of fish.

Removing or increasing commercial daily trip limits in this BRMA is going to put additional pressure on an already intensely fished resource. Allowing the increase only for the four winter months is not designed to eliminate increased impact on these fish, it only decreases possible conflicts (which apparently have occurred in the past...source...2019 Pacific City commercial groundfish meeting). Ports such as Newport which are already impacted by intense sport fishing pressure do not need the additional impacts of increased commercial fishing. This increase is being requested by a very small number of commercial fishermen, but the impacts could be experienced by a very large number of sports fishermen. It would appear from the chart on page 13 of *The Oregon Commercial Nearshore Fishery Data Update: 2018* that there are 11 or 12 permits in the Newport group, and inclusion of that port in a BRMA has kept landings far lower than ports outside BRMAs (as is also true of the Coos Bay/Charleston port). Since intense past and continuing groundfish fisheries do appear to have depressed stocks in this area, maintaining status quo for this port would seem to be desirable. Increased commercial pressure on these stocks in important recreational centers potentially degrades the stocks for everyone.