

Public Comment
Supplemental

To: Pacific Fishery Management Council

From: Milton Love

Date: June 16, 2006

Re: 2007-08 Groundfish Management Measures and the Cowcod Conservation Area

Regarding the Cowcod Conservation Area, I note with some disquiet yet another attempt to peel away some of the protections afforded by these closures.

Truly, this is the typical "Death By A Thousand Cuts" that is the traditional pattern of most fishery management around the world, where decent regulations are, over time, abraded by sheer dint of effort on the part of user groups and apparent fatigue by fishery managers. While both of these processes are understandable, and I even have a certain sympathy for all of the participants, one might ask, after all of the disastrous fishery management decisions that have occurred for several centuries, haven't we have evolved past this?

Here are some of the reasons that rolling back the size of the Cowcod Conservation Area footprint makes no sense.

1. **We don't know what lives in the rocky areas to be opened.** No one has conducted any surveys examining the densities of fishes and habitat-forming invertebrates (such as deep-water corals) in the areas suggested for opening. At the very least, it is not clear that cowcod do not live in the area to be opened to fishing. In this day and age, why would anyone allow the start of fishing operations of any sort in an area that has not been assessed?
2. **Fishing operations cannot be accurately monitored.** Having conducted surveys in much of the CCA, it is clear that there are numerous steep-sided areas where bottom depth drops off abruptly. In some areas, bottom depth may change hundreds of feet over a very short lateral distance. Given the limitations of the ship tracking devices, it is not credible that ship positions will be able to be assessed sufficiently accurately to detect either inadvertent or intentional poaching.
3. **The CCA protects more than cowcod.** The CCA protects all of the benthic organisms within its boundaries. Fishes and invertebrates of all types enjoy these benefits. Given that the stocks of most benthic fish species (let alone deepwater corals and other habitat-forming invertebrates) have not been properly assessed, why would it be prudent to allow greater take of these animals? For instance, in the depths that are proposed to be opened, blackgill rockfish (*Sebastes melanostomus*) are found. It is debatable whether the stock of this animal is in good shape, why then allow greater take?

I really like both the commercial and recreational fishing industries. I hope they become a lot healthier and more self-sustaining than they are today. But really, prudence should be the watchword here. Worldwide, prudence has not been in the vocabulary of much fishery management for a long time. Perhaps it can start here

Milton Love	Phone (805) 893-2935
Marine Science Institute	Fax:(805) 893-8062
University of California	e-mail:love@lifesci.UCSB.edu
Santa Barbara, CA 93106	
webpage http://www.lovelab.id.ucsb.edu	