

**CENTER FOR MARINE CONSERVATION**

580 Market St., Suite 550  
San Francisco, CA 94104

October 23, 2000

Pacific Fishery Management Council  
2130 SW Fifth Avenue, Suite 224  
Portland, OR 97201

Comments on October 2000 PFMC agenda item C. 1., Rebuilding Plans for Cowcod and Canary Rockfish.

Chairman Lone and Council members,

The Center for Marine Conservation (CMC) respectfully submits these comments on the issue of Rebuilding Plans for cowcod and canary rockfish. CMC represents over 20,000 members on the west coast with an interest in healthy ocean ecosystems. We have been actively involved in this issue for several years through participation on the Groundfish Advisory Subpanel and we have commented previously on these rebuilding plans as well as fisheries management measures for these species.

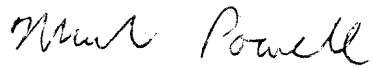
These rebuilding plans are fundamentally deficient because there is no credible measurement of fisheries-caused mortality for these species. There is no accounting system for commercial and recreational discards, and only a very poor system for monitoring recreational landings. The lack of reliable data on discards and recreational catch is contrary to requirements in the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) for rebuilding plans. Rebuilding plans are required to end overfishing and rebuild affected stocks. 16 U.S.C. 1854 (e) (3). Further, rebuilding plans must be reviewed at least every two years for "adequate progress towards ending overfishing and rebuilding affected fish stocks." 16 U.S.C. 1854 (e) (7). Without adequate monitoring, it is impossible to know whether the rebuilding plans are working. The rebuilding plans should be modified to require monitoring of total fisheries-caused mortality for cowcod and canary rockfish.

The rebuilding plans also fail to specify management measures sufficient for rebuilding cowcod and canary rockfish as required by the Magnuson-Stevens Act. 16 U.S.C. 1854 (e) (3). Lacking specific measures, the rebuilding plans are merely incomplete statements of goals and actual rebuilding is deferred to the annual management process. The rebuilding plans should be modified to include management measures that will dramatically reduce mortality of cowcod and canary rockfish, and provide some reasonable assurance that fisheries-caused mortality will remain below rebuilding targets throughout the rebuilding period. Relying on the annual management process does not provide adequate assurance of rebuilding.

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These problems with the rebuilding plans have tremendous practical significance. Bycatch of overfished species is likely to be an increasingly large fraction of total mortality as landings are reduced. Anecdotal reports suggest that discarding of depleted species is common when they are accidentally caught while fishing for other, more abundant species. Rebuilding plans are unlikely to be successful if they lack specific measures to protect overfished species and reliable monitoring of the effectiveness of these protections.

Thank you for the opportunity to comment on these issues,

A handwritten signature in cursive script that reads "Mark Powell".

Mark Powell, Ph.D.  
Pacific Fisheries Project Manager

PETER LEIPZIG  
FISHERMEN'S MKT. ASSOC.  
10/31/06

COMMENTS ON C-1

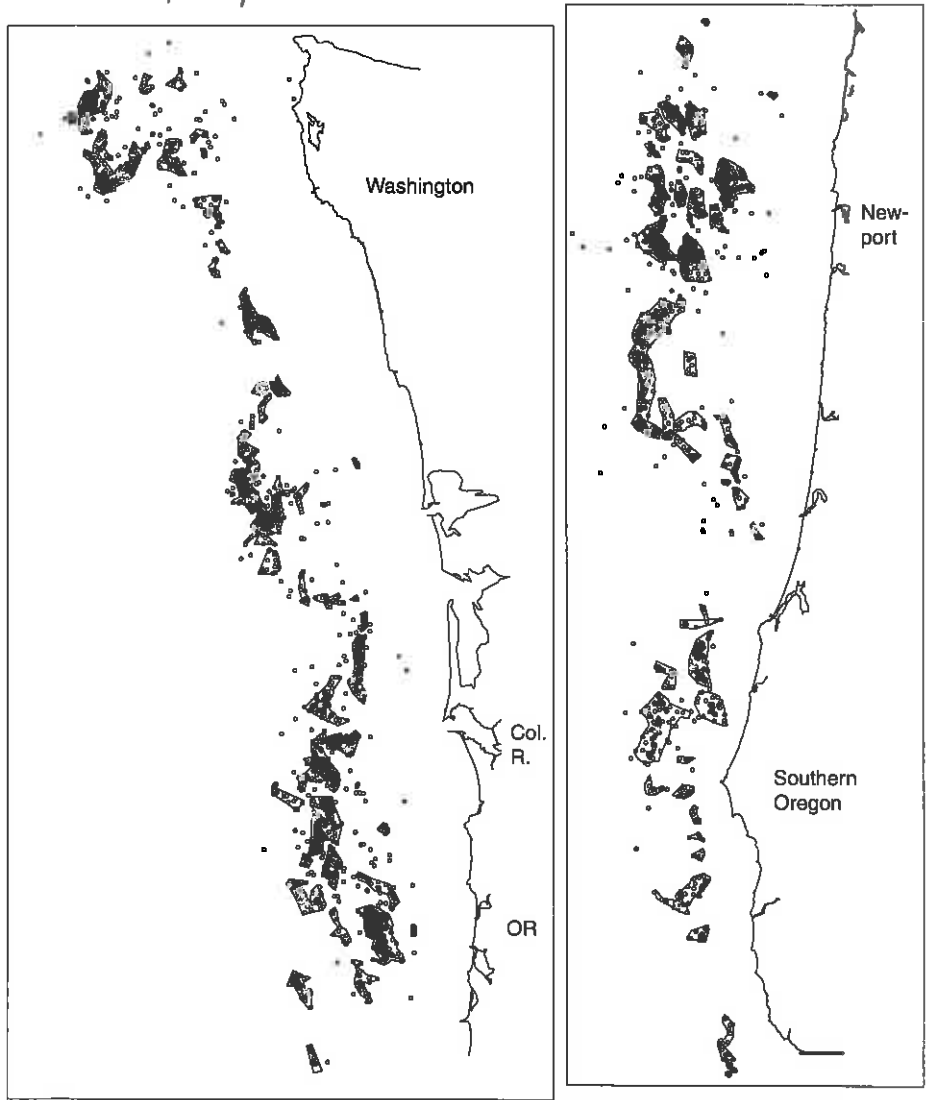


Figure 1. Distribution of high CPUE (>800 lbs/h) rockfish tows (Oregon logbooks) from 1993-95. Polygons enclose clusters of productive tows.

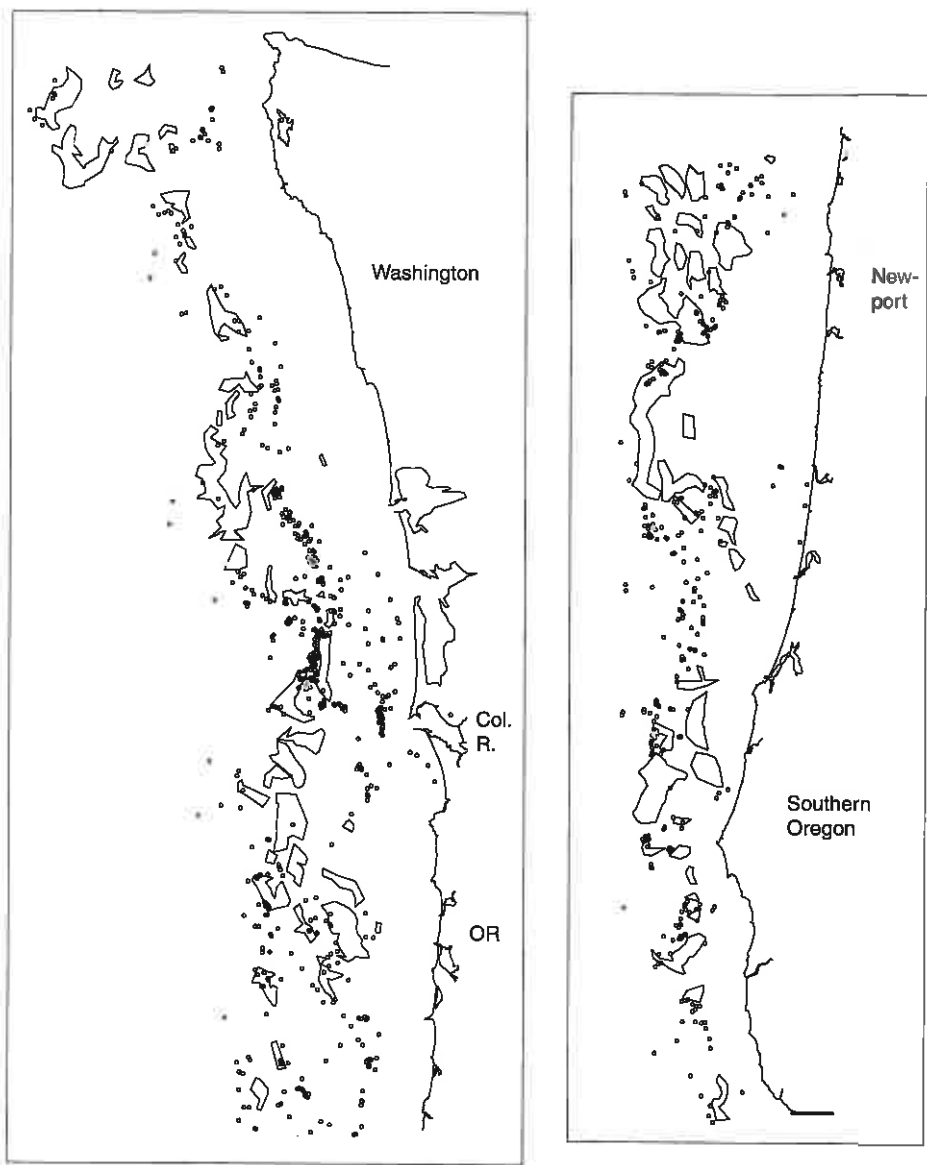


Figure 2. Comparison of geographic distribution of Oregon small footrope trawl effort, January through June 2000 (small circles- gear 392) with high rockfish CPUE areas (polygons) from 1993-95.

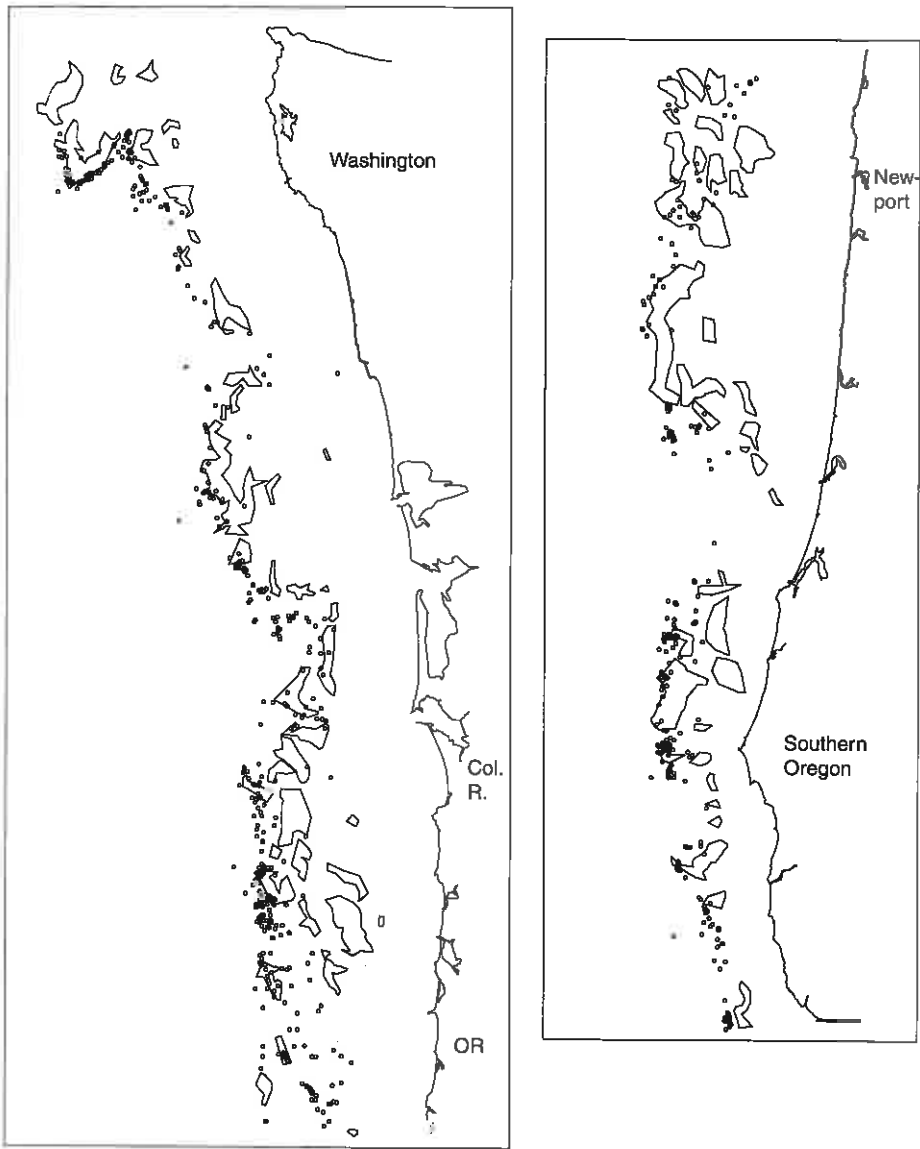


Figure 3. A comparison of January through June 2000 roller trawl gear (391) versus high rockfish CPUE areas (polygons) from 1993-95.