

**PACIFIC FISHERY MANAGEMENT COUNCIL**

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January 30, 2004

Mr. Timothy R.E. Keeney  
Deputy Assistant Secretary for Oceans and Atmosphere  
United States Department of Commerce  
1401 Constitution Ave, NW  
Washington, DC 20230

Dear Mr. Keeney:

The Pacific Fishery Management Council (Pacific Council) would like to take this opportunity to inform you of upcoming plans to consider the issue of creating artificial reefs in Southern California from decommissioned offshore oil platforms, under its authority as described in the Magnuson-Stevens Fishery Conservation and Management Act. We understand the National Oceanic and Atmospheric Administration (NOAA) is considering a proposed rule on this matter and would like to coordinate input from the Pacific Council during the open comment period.

The Pacific Council is very concerned about the overfished status of species of rockfish inhabiting Southern California marine areas, particularly cowcod and bocaccio rockfish. Rebuilding these stocks to healthy levels is of paramount importance to the various sport and commercial fisheries of the area, which have been substantially restricted to protect these stocks. Current estimates of rebuilding time frames are dramatic for these long-lived species; cowcod, for example, are projected to take 90 years to rebuild, even with a complete cessation on directed fishing, a closed area encompassing the bulk of their known habitat, and an incidental catch allowance in other fisheries of extremely minor amounts. The Pacific Council is interested in looking at anything that has potential in accelerating rebuilding of these stocks. Because there appears to be indications of concentrations of rockfish around existing offshore platforms, it seems appropriate to proceed with a proposed rule to appropriately deal with the question of an optimal decommissioning strategy that is best for the fish populations and the dependent fishery communities.

The Pacific Council is scheduled to meet twice in the upcoming spring months. We will meet the week of March 7-12, 2004 and April 4-9, 2004. We have scheduled consideration of this matter on the March agenda. At that time, the Pacific Council will consider reviews of the various NOAA scientific and technical reports that have been prepared on this issue, other relevant materials, and the anticipated proposed rule language. After hearing these reviews, the advice of formal Council advisory bodies, and public comment, the Council will consider taking a position on the proposed rule and submitting formal comment. In the instance further analysis is required, the Council may defer any decision making on this issue until the April Council meeting. It would be appreciated if you would consider these Council meeting dates in scheduling the open comment period.

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Please send us a copy of the proposed rule when it becomes available.

Thank you for your consideration on this important matter.

Sincerely,



D. O. McIsaac, Ph.D.  
Executive Director

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- c: Council Members
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