

Point Conception Groundfishermen's Association Santa Barbara, CA

March 26, 2008

Don Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Pl. Suite 101
Portland, OR 97220-1384

RE: 2009/2010 Cow Cod OY

Mr. Chairman and members of the Council,

The Point Conception Groundfishermen's Association (PCGA) represents commercial fixed gear fishermen in Southern California, many of whom rely solely on fishing for rockfish for a living. We wish to comment on a very important decision the Council will be making in Seattle that could severely impact our members.

The Council will be selecting final OY's for the upcoming 2009/2010 fishing seasons with Cow Cod being one of the most important to Southern California. PCGA requests that the Council adopt status quo alternative 3, that being a 4 MT OY. Anything less than this will in fact create economic hardship on a fleet that has been struggling to survive since the first Cow Cod assessment back in 1999. The Council took drastic measures in 2001 to create protection for this species in the form of the Cow Cod Conservation Area (CCA), a massive 4600 square mile closed section of ocean containing the most prime Cow Cod habitat. The Council has also implemented RCA's in the other still open areas with more stock protection in the waters between 60 and 150 fathoms.

PCGA reminds the Council that the latest Cow Cod assessment is one of the most data poor reviews this management body has ever undertaken. We strongly feel that a 4 MT OY offers plenty of stock protection and allows for absolutely no directed fishing! With the CCA and other RCA's currently in place in the So Cal Bight, Cow Cod may very well be the most protected species in the United States! We hope that the Council considers this in its deliberations, and chooses not to cause any further economic harm to the fishermen of Southern California. Please maintain the Cow Cod status quo OY of 4 MT for the 09/10 fishing season!

We thank you for your consideration of this matter.

Gerry Richter,
VP PCGA

MIRAGE SPORTFISHING

March 25, 2008

Donald Hansen, Chairman

Pacific Fishery Management Council
7700 NE Ambassador PL Suite 101
Portland, OR 97220-1384

Subject OY for Cow Cod

RECEIVED

MAR 26 2008

PFMC

Dear Donald Hansen, Chairman:

Mirage Sportfishing is a charter service (CPFV) that operates exclusively in the Southern California Bight. We rely heavily on ground fish. To loose any opportunity that we had in the 2007/2008 management cycle would be economically devastating. To loose any opportunity due to the recent cow cod stock assessment would be ludicrous, a stock assessment that has very little substance behind it.

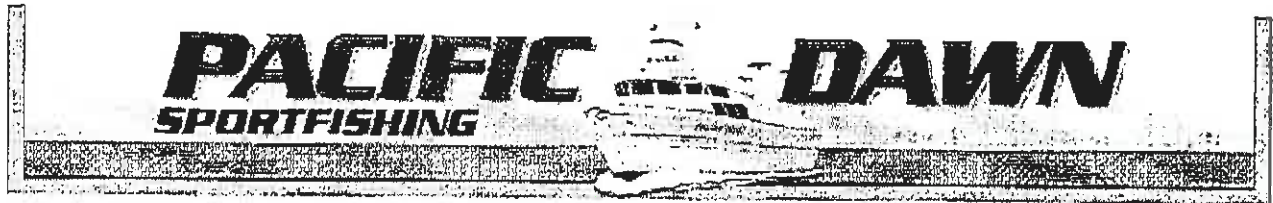
In the Southern California Bight, we have huge areas set aside just for the conservation of the cow cod. And 100 percent of the cow cod spawning habitat is protected by conservation areas such as the, RCA and the CCA which have never been factored into any rebuilding program.

With this being said, I would strongly urge the council to consider the fact that anything less than status quo (4 metric ton O Y for cow cod) would create an economic disaster for myself and the rest of the fleet.

Sincerely,



Joe Villareal
Owner/Operator



2638 Gamson St.
San Diego, Ca 92115

Phono (619) 269-2186

fax (619) 269-2672
RECEIVED

Donald Hansen, Chairman

MAR 27 2008

Pacific Fishery Management Council
770 NE Ambassador PL. Suite 101
Portland, OR 97220-1384

PFMC

Subject OY for Cow Cod

Dear Donald Hansen, Chairman:

Pacific Dawn Sportfishing is a charter service (CPFV) that operates seasonally in the Southern California Bight. We spent our spring season (March 1 - June 15) and our Fall season (November 1 - December 31) Operating out of Ventura county. In that time we rely heavily on ground fish. To loose any opportunity that we had in the 2007/2008 management cycle would be like eliminating one of our seasons all together. It would have a huge negative economic impact on my business, as well as many others. To loose any opportunity due to the recent cow cod stock assessment would be ridiculous, a stock assessment that has very little substance behind it.

In the Southern California Bight, we have huge areas set aside just for the conservation of the cow cod. And 100 percent of the cow cod spawning habitat is protected by conservation areas such as the , RCA and the CCA which have never been factored into any rebuilding program.

With this in mind, I would strongly urge the council to consider the fact that anything less that status Quo (4 metric ton OY for cow cod) would create an economic disaster for business, my family and the rest of the fleet.

Sincerely,

Patrick Cavanaugh
Captain/Owner

Pacificdawn.com

pacificdawnsportfishing@cox.net



SPORTFISHING ASSOCIATION OF CALIFORNIA

1084 BANGOR STREET
SAN DIEGO, CALIFORNIA 92106
(619) 226-6455 FAX (619) 226-0175
Email: dart@sacemup.org

ROBERT C. FLETCHER
PRESIDENT

RECEIVED

MAR 25 2008

PFMC

March 21, 2008

Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Pl., Suite 101
Portland, OR 97220-1384

Subject: OY for Cow Cod.

Dear Chairman Hansen:

The Sportfishing Association of California (SAC) represents over 130 commercial passenger Fishing Vessels (CPFVs) in southern California, and many of these small businesses rely on fishing for rock fish in the waters of the southern California bight. It is for this reason that we are writing and are frankly at a loss to understand the recent cow cod stock assessment that recommended an OY of only 2 tons!

The cow cod conservation area covers nearly 4500 square miles of ocean with much of it centered in prime cow cod habitat. The rock fish conservation area covers all waters deeper than 60 fathoms south of Point Conception. Between the two, they protect nearly 100 % of the cow cod spawning and rearing habitat south of Point Conception, and multi beam sonar and remotely operated vehicle surveys over the last several years have shown large numbers of cow cod throughout the CCA and the RCA.

As the status quo of 4 MT is within the range of options to be considered, SAC would like to strongly support adoption of this alternative, as anything less without clear scientific justification would be punishing an industry with scant cause. Kind of like an 'El Nino' adjustment without an El Nino! Please consider the negative economic impact of choosing a lower OY and adopt the 4 MT OY for cow cod.

Thank you for your consideration of our comments.

Sincerely,


Bob Fletcher, President

ALOHA SPIRIT SPORTFISHING

March 27, 2008

Donald Hansen, Chairman

Pacific Fishery Management Council
7700 NE Ambassador PL Suite 101
Portland, OR 97220-1384

Subject OY for Cow Cod

RECEIVED

MAR 27 2008

PFMC

Dear Donald Hansen, Chairman:

Aloha Spirit Sportfishing is a charter service (CPIV) that operates exclusively in the Southern California Bight. We rely heavily on ground fish. To loose any opportunity that we had in the 2007/2008 management cycle would be economically devastating. It would not only be devastating on the fishing side of things, but most of us have mortgage's to pay, kids to put through school and are a sole income for a family. To loose any opportunity due to the recent cow cod stock assessment would be ludicrous, a stock assessment that has very little substance behind it.

In the Southern California Bight, we have huge areas set aside just for the conservation of the cow cod. And 100 percent of the cow cod spawning habitat is protected by conservation areas such as the, RCA and the CCA which have never been factored into any rebuilding program.

With this being said, I would strongly urge the council to consider the fact that anything less than status quo (4 metric ton O Y for cow cod) would create an economic disaster for myself, my family, and the rest of the fleet.

Sincerely, Shawn Steward



Owner/Operator
ALOHA SPIRIT

REEL GRAPHICS

March 27, 2008

Donald Hansen Chairman
Pacific Fishery management Council
7700 NE Ambassador Pl. Suite #101
Portland, Or 97220

RECEIVED

MAR 27 2008

PFMC

Subject OY for Cowcod

Dear Donald Hansen, Chairman:


Reel Graphics Inc. is a graphics company that operates it's business in Southern California. We do graphics on sportfishing and commercial yachts and small craft. To lose any more of our fishing grounds will be devastation to our business and other business that rely on the sport and commercial community.

To loose any opportunity due to the recent cow cod stock assessment would be ludicrous, with a stock assessment that has very little research behind it.

In southern California Bight, we have set aside just for conservation of the cow cod, and 100 percent of the cow spawning habitat is protected by conservation areas such as the RCA and CCA have never been factored into any rebuilding program.

I would strongly urge you to consider the fact anything less then 4 metric tons O Y for cow cod would create an economic disaster for myself, my family, and the rest of the fishing community.

Sincerely,



Keith Denette
Owner

1921 W. 5TH ST. • OXNARD, CA 93030
805-815-0484

March 30, 2008

RE: Cow Cod Stock Assessment

Dear Pacific Fishery Management Council Members,

I would like you to consider the following information regarding the utility of the stock assessment information regarding the current abundance of Cow Cod on the west coast and some suggestions to improve this situation and your decision making process.

The most current assessment is a data poor stock assessment that is technically flawed in several key aspects, primarily because the National Marine Fishery Service (NMFS) has engaged in a neglectful and shortsighted Cow Cod management strategy.

Adopting an Optimum Yield (OY) below the current small OY will only exacerbate this problem.

The Technical problem with this assessment and many other rockfish assessments can be traced back to crisis management without any commitment or funding for management. All stock assessments require an assessment model and input data. The input data historically used for Cow cod is primarily fishery dependant. This means that it was generated by collecting CPUE, size structure, and regional catch statistics information from fishing activity.

When you were forced to create the Cow cod Conservation Area (CCA) as well as the CRCA by your federal partner the NMFS, you technically corrupted the utility of fishery dependant input data that the stock assessment models require, because you ended the fishery and its ability to produce the required input data.

It is impossible to understand the current relative abundance of Cow cod in the CCA compared to the relative abundance of Cow cod the year you created the closure using the model you are using due to two key factors.

Factor 1: No fishing has been allowed in the Cow cod's preferred depth range for 8 years, thus recovery or further decline of the stock can not be measured by running models that are dependent on data streams produced by a fishery that no longer take place. No fishing, no new data! No new data, no ability to manage effectively.

Factor 2: No viable and/or accepted monitoring system was or has been developed to measure how Cow cod respond when fishing is stopped. If the NMFS cannot respond appropriately to this problem, it is your responsibility to take action.

Failing to recognize the significance of this action and continuing to run dateless models (stock assessment) is irresponsible, irrational, and a dereliction of our management duties.

The solution to this problem is not to eliminate your data stream it is to enhance it.

1) You should support sonar surveys pared to ROV verification.

2) You should immediately develop an annual CPUE, and size structure, fishing for data transect survey in the CCA. This will enable you to develop an abundance index over time, as well as real time fishery dependant data to support your current assessment model.

Had you developed this index 8 years ago you would be making this decision based on information, not the lack of it.

If you are concerned that the index would cause too much mortality then you are just looking for excuses to do nothing. Lead, follow or get out of the way.

Chris Hoeflinger
"A" permit holder

March 30, 2008

RE; Cow Cod Stock Assessment

Dear Pacific Fishery Management Council Members,

I would like you to consider the following information regarding the utility of the stock assessment information regarding the current abundance of Cow Cod on the west coast and some suggestions to improve this situation and your decision making process.

The most current assessment is a data poor stock assessment that is technically flawed in several key aspects, primarily because the National Marine Fishery Service (NMFS) has engaged in a neglectful and shortsighted Cow Cod management strategy.

Adopting an Optimum Yield (OY) below the current small OY will only exacerbate this problem.

The Technical problem with this assessment and many other rockfish assessments can be traced back to crisis management without any commitment or funding for management. All stock assessments require an assessment model and input data. The input data historically used for Cow cod is primarily fishery dependant. This means that it was generated by collecting CPUE, size structure, and regional catch statistics information from fishing activity.

When you were forced to create the Cow cod Conservation Area (CCA) as well as the CRCA by your federal partner the NMFS, you technically corrupted the utility of fishery dependant input data that the stock assessment models require, because you ended the fishery and its ability to produce the required input data.

It is impossible to understand the current relative abundance of Cow cod in the CCA compared to the relative abundance of Cow cod the year you created the closure using the model you are using due to two key factors.

Factor 1: No fishing has been allowed in the Cow cod's preferred depth range for 8 years, thus recovery or further decline of the stock can not be measured by running models that are dependent on data streams produced by a fishery that no longer take place. No fishing, no new data! No new data, no ability to manage effectively.

Factor 2: No viable and/or accepted monitoring system was or has been developed to measure how Cow cod respond when fishing is stopped. If the NMFS cannot respond appropriately to this problem, it is your responsibility to take action.

Failing to recognize the significance of this action and continuing to run dateless models (stock assessment) is irresponsible, irrational, and a dereliction of our management duties.

The solution to this problem is not to eliminate your data stream it is to enhance it.

1) You should support sonar surveys paired to ROV verification.

2) You should immediately develop an annual CPUE, and size structure, fishing for data transect survey in the CCA. This will enable you to develop an abundance index over time, as well as real time fishery dependant data to support your current assessment model.

Had you developed this index 8 years ago you would be making this decision based on information, not the lack of it.

If you are concerned that the index would cause too much mortality then you are just looking for excuses to do nothing. Lead, follow or get out of the way.

Chris Hoeflinger
"A" permit holder

John Law
2795 Massachusetts Ave.
Lemon Grove, CA. 91945
(858) 414-9731

Agenda Item H.1.a.

Council Members, It has been brought to my attention that the stock assessment for Cow Cod is up for review and that there is consideration for lowering the OY below the current OY of 4 MT's.

Currently the entire habitat for Cow Cod is closed to all types of directed fishing. All waters of the state beyond 60 fathoms are off limits to sport and commercial fishermen. In addition, thousands of square miles are dedicated as " Cow Cod Closure Areas ". Commercial fishermen fishing in both the limited entry and open access categories are now required to have operating VMS systems aboard as insurance that none of the CCA's and RCA's are being fished. Sport fishermen are limited to the same 60 fathom water and because of the two hook limit, and severe restrictions on the take of Boccacio, they are now forced to fish shallower, with more emphasis on a combination of shelf and deeper nearshore rockfish and ocean whitefish.

There is nothing more that can be done to protect Cow Cod from the sport or commercial sectors. The simple fact is, the waters where Cow Cod live are completely off limits and protected. Any lowering of the 4MT OY is not necessary and will only lead to further reductions and stress on both fleets.

Thank You. John Law