

October 15, 2015
Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: cow cod conservation area boundaries

Dear Chair Lowman and Council members,

On behalf of the many fixed gear ground fish fisherman that fish in the Southern California Bight for slope complex species such as thornyhead and blackcod, I would like to request a re-examination of the current CCA boundaries and the need for the vast amount of closed area that has nothing to do with cow cod habitat.

I would also like to remind the Council that at its June 2007 meeting in Menlo Park CA, at the request of the Point Conception Groundfishermen's Association, a change to allow fishing seaward of the 175 fathom depth contour in the CCA was overwhelmingly approved. At that time, all of the science supported the change as did years of, and hundreds of observed sets with fixed gear that showed a total of ZERO cow cod caught in the slope fishery. Ultimately, politics and not science won the day as a directive in September 2007 from NOAA headquarters in Silver Springs, Maryland rescinded the Councils decision in their typical arbitrary and capricious fashion.

Eight years later, the science is even more supportive of the change. Cow cod are rebuilding light years ahead of earlier projections and now with thousands of observed sets deeper than 150 fathoms there is still an insignificant and nil catch of the species even with the greater likelihood of encountering them. The industry is simply overwhelmed with the burdensome regulatory climate. Now we are faced with new VMS regulations that require an increased ping rate at more expense to fishermen. When does the industry get some relief? Please thoughtfully consider this request and give us something tangible back for all the sacrifices we have had to make. The science clearly shows the current CCA boundaries are draconian and obsolete.

Sincerely,
Tim Athens
FV Outer Banks

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From: **kenyon hensel** <kenyonthensel@gmail.com>

Date: Wed, Oct 14, 2015 at 4:35 PM

Subject: Item I 9 Kelly Aimes

To: pfmc.comments@noaa.gov

Concerning item I 9 management measures, I am proposing a different way of approaching management in my area which requires a new view of harvests. First I must address the repercussions of reducing our black rock fish catch below 1000 LBs a week in the area of Cape Mendocino to the Oregon California border.

For the last few years we have worked under a catch limit of 8200 lbs per two months, and we have watched buyers of black rock fish leave our docks, until only one is left. Without competition, that buyer now dictates when to fish and how much those who fish for him can land. If you reduce our limits and keep them down, we may lose even that one imperfect buyer. Also lowering limits will result in lost of deck hand jobs, and the industry driven educational component of our fishing businesses. The council has a responsibility to our near shore small boat fishing community, which relies heavily on landings of black rock fish in this area.

I am asking the council to create a floor of 1000 lbs a week of black rock fish for the area from Cape Mendocino to the Oregon California border to avoid any more reduction in our fishing infrastructure. Since the late 1990s fishermen have given up over 40% of our prime black rock fish habitat to RCAs and MPAs. If we fished out all of the black rock fish in the areas left to fish, we still could not reduce the overall population of black rock fish below the over fished threshold. Yet as we have fished in this smaller area with the 8200lb limit, we have seen a very noticeable increase in numbers and size of individual fish around us, so we are sure the stocks can handle these removals without depleting the reefs we fish. This is a sustainable harvest level, let us prove it.

Setting this kind of community threshold would also send a much needed positive message that the council does indeed consider fishing communities important, and that the sacrifices we have made to create an abundance of these fish can be rewarded. It would also create stability putting these fishermen in a better position to be involved with other management needs.

Many economic studies conducted in the past by the council identified Crescent City as especially vulnerable to economic hardship because of lack of high paying jobs and loss of traditional industries. Our economic situation has changed little since those reports were written. The small size and stability of our state permitted black rock fish fishery allows for much more control than the open access fishery in general, so setting a limit like this will not create a race for fish. 1000 lbs a week is barely subsistence fishing. Anything less is a hardship.