

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE REPORT
ON WORKLOAD AND NEW MANAGEMENT MEASURE PRIORITIES

As described in the Summarized Conceptual Design of Groundfish Workload and Prioritization Process schematic ([Agenda Item G.2, Attachment 1](#)), the March Council meeting is one time to propose new items for inclusion on the management measure list, or to revise and update the list accordingly.

The California Department of Fish and Wildlife (CDFW) recommends including a stand-alone item on the list identified simply as ‘Repeal the Cowcod Conservation Areas.’ Accordingly, the item currently referred to as ‘Non-Trawl RCA Adjustments (Including CCA revisions) & Emley Platt EFP’ in [Agenda Item G.2.a, GMT Report 1, Appendix 1](#), would be amended to remove reference to the CCA. Further, the item shown on the proposed April 2021 Council agenda ([Agenda Item C.6, Attachment 2](#)) which currently reads ‘Non-Trawl RCA & Emley-Platt EFP into Regulations’ would not include any content in future agenda materials that refer to modifications of CCA boundaries.

CDFW now sees the removal of references to the CCAs in the current Fishery Management Plan and regulations, analytical documents, and reference materials as necessary cleanup, to bring our materials in line with the current state of biological knowledge of this stock. While discussions under the workload and prioritization agenda item in the last biennium resulted in combining actions related to the CCA with that of Non-Trawl Rockfish Conservation Area (RCA) boundaries, that pathway now appears needlessly complex. Adjustments to the Non-Trawl RCA lines or amendments to allow select gears or fisheries to operate inside the RCAs is a matter entirely separate from CCAs, and those discussions will involve factors that do not directly address the rebuilt status of cowcod.

A giant swath of ocean off southern California remains off-limits to groundfish harvesting by both commercial and recreational sectors. Given workload and other priorities in the 21-22 biennial specifications cycle, the clean-ups needed to the regulations for consistency with the ‘rebuilt’ status of this stock did not happen. The regulations governing CCAs are antiquated and no longer necessary, and yet still convey to the general public that cowcod are in need of special protections in the form of their very own conservation areas. While the Council has a history of establishing or endorsing closed-area protections for certain species, they have traditionally been limited to those that are endangered or overfished, such as Yelloweye Rockfish Conservation Areas and the Pacific Leatherback Conservation Area.

In the 21-22 biennial cycle, the Council and its advisors gave considerable thought and planning in designing new cowcod specifications and management measures that would allow the stock to continue on the current trajectory of increased biomass. With the support of the Council and the Groundfish Advisory Subpanel, cowcod retention in non-trawl recreational and commercial fisheries is still completely prohibited, despite considerable increases to the Annual Catch Limit,

Fishery Harvest Guideline and Annual Catch Target in the 21-22 biennium. Increases in cowcod bycatch and research fishing are expected, and allowable annual vessel limits in the Individual Quota fishery likewise experienced modest increases. However, these management measures in combination are projected to produce annual fishery mortality levels that fall well below the specifications this cycle.

Continuing to maintain, implement and enforce CCA regulations comes at a cost to agencies tasked with this responsibility, including CDFW. It also requires significant outreach and education with the recreational and commercial fishing public. When asked to explain the need for and value of the CCAs now that the stock is rebuilt, there is not a clear answer. Particularly for recreational fisheries, it makes communications with participants difficult and needlessly complex, and also can create challenges with enforcement actions. CDFW has already experienced such circumstances this spring, in our efforts to depict and communicate closed RCA and CCA fishing areas to the angling public. Waters inside the CCA are closed to groundfish fishing, but so are the adjacent waters, as they are part of the recreational RCA.

In the event the CCA regulations are repealed, the Southern Groundfish Management Area would still be subject to Rockfish Conservation Area (RCA) closures, similar to all other areas off the California coast. Having the system of connecting waypoints to form RCAs is a longstanding and effective tool used by the Council to establish area closures and depth limits needed to protect those species of groundfish that require special protection. The 20+ year-old rule establishing the CCAs indicated a purpose and need to protect cowcod by reducing interactions from fisheries targeting other stocks. These areas are closed to both directed groundfish fishing and incidental take and were designed to protect about half of the total area where the spawning biomass of the stock was known to reside at that time. That purpose and need no longer exists given the 21-22 harvest specifications, management measures, and cowcod stock status. CDFW views an item to repeal the CCAs as cleanup, and do not expect it to have an untenable analytical burden associated with it.

While CDFW does not have a recommendation at this time with regard to prioritizing this item, we look forward to hearing input on that issue in future discussions regarding workload and prioritization.