



Coastside Fishing Club  
P.O. Box 5501, San Mateo, CA 94402

20 June, 2016

## Oppose No-Fishing Monument Designations off California's Coast

The Coastside Fishing Club is an all-volunteer CA non-profit organization with 10,000 members dedicated to enhancing the recreational fishing experience for all Californians. We oppose the proposed no-fishing aspects of monuments outlined in the recent flyer titled "The Case for Protecting California's Seamounts, Ridges, and Banks." Moreover, we note that this proposal has been advanced without seeking any input whatsoever from the largest marine user groups, recreational and commercial fishermen.

The areas identified in the proposal are indeed special places – they are rich in marine life and support valuable corals, sponges, and structures. These areas are deserving of protection from damaging activities. But we strongly disagree that fishing activities pose any threat to these areas, and find that the proposal grossly misrepresents the possible impacts of fishing on or near these areas.

Because these areas (except for the Cortes and Tanner Banks) are thousands of feet below the surface of the water, they are in no danger of interactions from fishing gear – they are simply too deep. The proposal falsely implies that gear interactions pose a threat to the marine communities that comprise the bottom ecosystem, and the structure that supports it. In fact, because of their great depth, no fishing gear can interact with the bottom structure and organisms. While some fishing gear, like trawl nets can be used a few hundred feet below the surface, that still leaves a protective margin of several thousand feet. To suggest that fishing poses a threat to the bottom habitat and ecosystem is completely false, and the proponents of the designation are deliberately making unfounded statements to attack the recreational and commercial fishing communities.

Fishing operations do affect the populations of fish that reside well above, or pass through the top of the water column above these iconic places; that is why these areas are known to and cherished by the fishermen of California. But far from the damaging fishing practices outlined in the proposal, fishing is a highly regulated and sustainable activity governed by the Magnuson Stevens Act (MSA). Under the MSA the commercial and recreational fisheries are conducted in sustainable and controlled ways to manage the total catch and to reduce by-catch to the maximum extent practicable. Those protections are already in place in accordance with laws passed by the Congress and signed into law decades ago. Since then overfishing has been stopped on the Pacific Coast, fish populations are successfully being rebuilt, by-catch has been dramatically reduced, and Essential Fish Habitat has been declared and real protections put in place. These MSA protections are already in place, not only for the deep seamounts and ridges but also for the shallow Cortez and Tanner Banks.



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Not only are these areas rich in marine habitat, and consequently fish, they are areas that have traditionally, and sustainably been fished by both recreational and commercial fishermen. We target tunas and other pelagic fish that live and pass through the waters above these areas, and we target mid-water groundfish, in the upper reaches of the water column. Consequently these areas are critical to the fishing economy of California: an economy that is struggling to survive; and our coastal communities are suffering as a result. Fishing regulations should be exclusively considered under the authority of the MSA. To include them in the monument proposal is wrong and unnecessary; and the proposal inappropriately implicates the recreational and commercial fishing communities with activities that are unrelated to ensuring these areas remain as iconic, viable, and healthy ecosystems.

Consequently, we strongly oppose the inclusion of fishing related restrictions in the proposals to designate monument status for the iconic seamounts, ridges, and banks off of California. The proponents of such measures are deliberately misstating the issues regarding the potential for fishing related impacts. We urge everyone to oppose including any fishing restrictions within any monument designations for these areas – leave that to the authority of the MSA.

Dan Wolford, President

A handwritten signature in black ink, appearing to read 'D L Wolford', written in a cursive style.

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