

Date: 4/28, 2005

Agenda Item C.3.d  
Public Comment 2  
June 2005

NMFS received 755 comments of this type.

Dear Mr. Lohn:

A healthy Pacific Ocean is crucial for our way of life including our economy and recreation.

For more than three years, Oceana has been bringing science and information to the Pacific Fishery Management Council and NOAA regarding the importance of protecting deep sea corals and sponges from bottom trawling. I support protecting ecologically sensitive areas of the Pacific seafloor such as corals and sponges, and special places such as seamounts, biogenic areas, and deep sea canyons from destructive commercial fishing.

As you consider the Essential Fish Habitat Draft Environmental Impact Statement, please adopt a management alternative which protects habitat and maintains vibrant fisheries.

Sincerely,

Name: Christopher Smith      Email: csmithhr@ucla.edu  
Address: 11 Tirremia Drive      Signature: Christopher Smith  
City, State, Zip: Dana Pt, CA 92629

#1 →

NMFS received 8,266 comments of this type.

### Save Our Ocean Legacy



www.EnvironmentCalifornia.org

Dear Mr. Lohn, Regional Administrator, National Marine Fisheries Service:

#2 →

A healthy Pacific Ocean is crucial for our way of life, including our economy and recreation. For more than three years, Oceana has been bringing science and information to the Pacific Fishery Management Council and NOAA regarding the importance of protecting deep sea corals and sponges from bottom trawling. I support protecting ecologically sensitive areas of the Pacific seafloor, such as corals and sponges, and special places such as seamounts, biogenic areas, and deep sea canyons from destructive commercial fishing.

As you consider the Essential Fish Habitat Draft Environmental Impact Statement, please adopt a management alternative which protects habitat and maintains vibrant fisheries.

Name Christina Walters  
Address 650 Garcon Ave #32  
Phone 925-380-6574  
E-mail cwalters@ucsc.edu

Volunteer?

Student?

April 14, 2005

D. Robert Lohn  
NOAA Fisheries Regional Administrator  
7600 Sand Point Way NE  
BIN C15700, Bldg. 1  
Seattle, WA 98115-0070

NMFS received 382 comments of this type.

Dear Administrator Lohn,

As you consider alternatives to protect Pacific groundfish habitat, I urge you to close ecologically important areas to destructive gears, such as bottom trawls, and to create areas where all groundfish and their habitats are protected.

Pacific groundfish are in trouble. Years of heavy fishing have taken their toll so that today both the fish and the fishermen are suffering. We must take steps today to restore our oceans so that our marine wildlife and our fisheries can thrive in the future. Protecting essential fish habitat is one of the most important steps on this path.

Deep-sea corals, sponges, and rocky reefs are part of the seascape that supports ocean life and must be preserved. I also support actions that would help fishermen move away from destructive gears to more sustainable fishing.

I value the oceans and I want to see them healthy and vibrant in the years to come. I ask you to take real action now to protect underwater habitats.

Sincerely,

Ann Volk  
1143 A Roxie Lane  
Walnut Creek, CA 94597-1806  
USA

# 3

NMFS received 11,647 comments of this type

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Sandra Schultz <sandraschultz@earthlink.net>

**Date:** Wed, 11 May 2005 17:35:06 -0500

**To:** GroundfishEFHDEIS.nwr@noaa.gov

May 11, 2005

Regional Administrator D. Robert Lohn  
7600 Sand Point Way NE  
Seattle, WA 98115-0070

Dear Regional Administrator Lohn,

I urge you to protect ecologically important and sensitive ocean habitats, including deep water corals and sponges, from destructive fishing practices in the Pacific Ocean.

The waters off the West Coast of the United States contain a diversity and abundance of ocean life, including ecologically and economically important fish species. Sadly, years of unsustainable fishing practices have decimated many fish populations to dangerously low levels and damaged the habitat they need to flourish. Studies have shown that fishing gears such as bottom trawls, which are widely used on the West Coast, damage sensitive marine habitats. Right now you have the opportunity to protect and restore the ocean habitats necessary to sustain our marine life by protecting ecologically important and sensitive areas from destructive fishing practices such as bottom trawling.

I am particularly concerned about the protection of deep water coral and sponges that recent studies have shown occur off the West Coast. These organisms, which can live for centuries, are highly susceptible to damage from fishing. I urge you to protect these areas from further damage by prohibiting the expansion of bottom trawling and protecting known areas of coral and sponge.

Thank you for the opportunity to present these comments.

Sincerely,

Miss Sandra Schultz  
PO Box 460118  
Fort Lauderdale, FL 33346-0118

NMFS received 18,529 comments of this type.

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Renee Saville <renee\_saville@yahoo.com>

**Date:** Wed, 11 May 2005 15:50:46 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,

A healthy Pacific Ocean is crucial for our way of life including our economy and recreation.

For more than three years, Oceana has been bringing science and information to the Pacific Fishery Management Council and NOAA regarding the importance of protecting deep sea corals and sponges from bottom trawling. I support protecting ecologically sensitive areas of the Pacific seafloor such as corals and sponges; and special places such as seamounts, biogenic areas, and deep sea canyons from destructive commercial fishing.

As you consider the Essential Fish Habitat Draft Environmental Impact Statement, please adopt Alternative 12, which protects habitat and maintains vibrant fisheries.

Renee Saville  
1364 Todd St

Mountain View, CA 94040

NMFS received 58 comments of this type.

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS  
**From:** "adriana@girardsdressings.com" <adriana@girardsdressings.com>  
**Date:** Wed, 27 Apr 2005 19:00:39 -0500  
**To:** GroundfishEFHDEIS.nwr@noaa.gov

Dear Mr. Lohn, Regional Administrator, National Marine Fisheries Service:

A healthy Pacific Ocean is crucial for our way of life, including our economy and recreation.

A key to keeping the Pacific Ocean healthy is the protection of marine habitats necessary to support its diverse assemblage of ocean life, including economically valuable fish species. Sadly, many of these habitats have and continue to be impacted by destructive fishing practices. I support protecting ecologically sensitive areas of the Pacific seafloor such as corals and sponges; and special places such as seamounts, biogenic areas, and deep sea canyons from destructive fishing practices.

As you consider the Essential Fish Habitat Draft Environmental Impact Statement, please adopt a management alternative that protects these ecologically sensitive habitats necessary to maintain vibrant fisheries.

Adriana Briseno  
1318 S. Sycamore St.  
Santa Ana, CA 927071719

Note: The Council received duplicate copies of this letter from 6 different people.

3-15-05

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

RECEIVED

MAR 16 2005

PFMC

Dear Pacific Fishery Management Council,

Bottom contact gear, such as trawls, longlines, pots and traps, are dangerously destructive to marine life and the habitat they depend on. In your plan to minimize the adverse effects of such gear to essential fish habitat, please close ecologically sensitive areas to bottom trawling and other bottom contact gear, establish a process for setting a limit on the bycatch of habitat-forming invertebrates, such as corals and sponges, and create other provisions agreed upon by conservationists and scientists to protect the health of our oceans for future generations.

Please consider this an official comment on the 2005 Pacific Coast Groundfish EFH DEIS.

*Louise Marquis*



Louise Marquis  
PO Box 2285  
Berkeley, CA 94702-0285

Faint, illegible text and markings, possibly bleed-through from the reverse side of the page.

**Subject:** Groundfish Essential Fish Habitat Draft Environmental Impact Statement

**From:** "Robert Craven" <cravenr@charter.net>

**Date:** Thu, 28 Apr 2005 14:47:44 -0700

**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

**CC:** <pfmc.comments@noaa.gov>

Gentlemen: I am a small charter operator in the central Oregon coast area (Newport). I am also Vice resident of the Oregon Coast Sportfishing Association. I hope my comments on the proposed changes coming in the coastal groundfish fishery will help you to do a better job of managing this difficult challenge facing you now.

alternative A.4 is my Preferred option

No comment on section B

alternative C.3 It is not acceptable to close Habitat areas to all fishing because some types of fishing have little or no impact on the habitat. Option C.3.1 or C.3.2 is a much more rational approach to the problem, and would have the least economic impact on the coastal communities.

alternative C.14 NOT acceptable (see comments on alternative C.3 which apply to this alternative also.)

alternative D.2 Option D.2.1 One more Logbook! This will not set well with the smaller commercial, and charter vessel owners some operate only 4 months of the year, and have very little environmental impact. Option D2.2 Better, but from my point of view, it is still not good.

alternative D.3 This could be the economic straw that breaks the back of the small vessel operators. The impact of these vessels is minimal or none existant, but more people work on the small vessels than on the larger ones in this area. Do you really want to put all those people out of work? Do you really want to turn off the lights of the small coastal communities? I know the main thrust of this draft proposal is environmental, but I would like to remind all of you that Homo Sapiens is also part of the environment, and to fail to consider them in your proposals or to give them a lesser status is to fall short of the job. Please consider us also. Thank you for your time and attention.

Robert E Craven managing owner

Sea Quell Charters LLC

Hustler Charters LLC

Newport Oregon

**From:** "josestone" <josestone@actionnet.net>

**Date:** Thu, 28 Apr 2005 18:56:22 -0700

**To:** pfmc.comments@noaa.gov

I am writing this letter because, again, I find governing fishing bodies possibly considering some very disturbing fishing changes.

First, I would explain some of my background of my fishing expertise. I started fishing at the age of 13 and am now 61 & still fishing. I started in the troll fisher, as most fishermen did at that time, & then moved into bottom trawling where in 1962 I was running bottom trawlers at the age of 20. I have seen the Russians and the Polish take "ocean run" on our grounds. I survived hook changes, mesh size changes, season changes, mercury scares, Demoic acid & Listeria. Fish too white, fish too black, fish too old, fish too young & through all of this I have tried to apply common sense. It is too bad you can't teach common sense because it would be more valuable than today's gasoline.

I understand that as biologists and council members you are being forced down this path by litigation. I am convinced that no matter how we proceed the environmental groups will not be placated and as I look at some these alternatives I cannot see the logic behind them.

Under alternative 6.9, option 9.2 would eliminate the pink shrimp fishery. We have spent 20 changing & fine tuning this particular door arrangement. I actually believe that this door with its 8" wide shoe probably rides lighter on the bottom than the cambered designed doors the option prefers. I have some doubt that we are doing damage to the bottom when we will sometimes fish the same grounds for months with good catch rates.

Option 9.5 would completely curtail my scallop fishing.

Optiom 9.8 would raise havoc with the troll fishery. Troll fishermen fish from the top to the bottom of the water column, and to eliminate the bottom would devastate that fishery.

The reason I have written about these options is because they were the PMFC preferred alternatives.

We have experienced some huge changes in the last few years. We have seen the bottom fish fleet reduced & their area reduced drastically. No fishing from 50-250 fathoms which has, as I see it, solved the problem of bottom contact. This is a tremendous area that is closed with no fishing. As far as I am concerned, is a reserve.

The pink shrimp fleet has implemented sorting grates that eliminate the groundfish catch. The halibut fleet has been moved from inshore to outside of 100 fathoms, another example of our effort to help the council solve these problems.

I think it is time for the industry, the council and the environmentalists to stop making rules that will harm the fishing community. The council has repeatedly said that Rock fish recovery is a slow process so I think we need to give these latest changes (bottom fish 50-250 fathoms, halibut outside of 100 fathoms, shrimp boats with sorting grates) a chance to work. This is why I would endorse the status quo option at this time. It makes the most common sense, something that we all could use a healthy dose of now.

Thank you for considering this letter.

Joseph Rock

**Subject:** [Fwd: EFH]  
**From:** "Jim Seger" <Jim.Seger@noaa.gov>  
**Date:** Tue, 03 May 2005 14:41:29 -0700  
**To:** Kit Dahl <kit.dahl@noaa.gov>

Public comments on EFH.

----- Original Message -----

**Subject:**EFH  
**Date:**Sat, 30 Apr 2005 15:44:19 -0700  
**From:**Bill Diller <[wdiller@sbcglobal.net](mailto:wdiller@sbcglobal.net)>  
**To:**Jim Seger <[Jim.Seger@noaa.gov](mailto:Jim.Seger@noaa.gov)>

Dear Jim, I don't know if you are the person that I should be addressing this to, but if not, will you please forward it to the appropriate parties. These are my comments regarding EFH. First a note of introduction. My name is Bill Diller. I have been commercial fishing since 1970. I have been trawling since 1974 as a crewman first and then with my own boat since 1980. My permit number is GF0068. With EFH mandates becoming a reality, I would like to say that I fully endorse the Nature Conservancy proposal of buying some of us trawlers out of the fishery and creating no trawl zones with our help. No matter what scientists think about trawlers, we do know quite a lot about the bottom of the ocean, fish behavior, and habitats. I could easily give an accurate description of much of the bottom characteristics of the area from Santa Monica Bay to Point Sur. I venture to say that I could do that as accurately as I could describe my own real estate property. The Nature Conservancy approach to working with the fishermen while justly compensating them for their hard earned knowledge and abilities along with the financial investments that they have made is the only fair solution to this problem of addressing EFH. I would also like to point out that Oceana has not bothered to discuss any of this with the most affected stakeholders. They are basically ramming this down our throats without so much as consulting those with a lifelong stake in the health of the ocean. For the sake of doing this right while protecting human interests, the Nature Conservancy plan is the right way to go. Thanks, Bill Diller

--

Jim Seger  
Staff Officer - Fishery Economics  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, Oregon 97220-1384  
503-820-2280  
866-806-7204 (toll-free)  
[www.pcouncil.org](http://www.pcouncil.org)

**Subject:** [Fwd: Comment on 2005 Pacific Coast GroundfishDEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Wed, 04 May 2005 09:51:07 -0700  
**To:** Kit Dahl <Kit.Dahl@noaa.gov>  
**CC:** John DeVore <John.DeVore@noaa.gov>

----- Original Message -----

**Subject:** Comment on 2005 Pacific Coast GroundfishDEIS  
**Date:** Tue, 3 May 2005 09:41:15 -0700  
**From:** Rod Lee <rod@staffjennings.com>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
**CC:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>, <[Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)>

Dear Mr. Lohn,

I am writing you to express my opinions on the upcoming EIS groundfish proposal.

As a sportfisher and ex-commercial salmon troller, I have some experience with the fisheries off of the Oregon coast. I recently sold my boat and license after learning of the impending doom of the salmon fishery and I'm glad I did.

I understand the concern for wanting to protect our groundfish; however the problem I have is with the implementation of drastic methods without the convincing evidence to justify them. Based on my own observations it appears as though the stocks of Canary and Yelloweye rockfish are doing just fine, at least in the common "sportfishing" areas. Now I don't have "scientific" data to support that observation, but I don't think you or any of the government agencies have any "scientific" data to tell me I'm wrong either.

It is my understanding that Trawlers have created most of the concern for over harvesting of these protected groundfish? To my knowledge, the areas in which these trawlers fish is not the same as the areas the EIS is proposing to close to fishing? I'm curious as to how closing these areas are supposed to help and why it is necessary to penalize the sportfishermen for the trawler's over harvest?

I understand we are all in this together but if my neighbor kills off all the grass in his yard that doesn't give him the right to come over and use my yard to play in, right?

Here is the point of my email;

1. There are obviously areas that produce large amounts of these protected fish that are not commonly fished by sportfishermen. Why are you trying to isolate the areas that sportfishermen fish as opposed to closing areas Trawlers would use?
2. If you close an area, commercial or sport, use the correct and corresponding data for those areas. Do not base sport restrictions on Trawl data or vice versa.
3. The economic impact these closures would inflict to the coastal economies will be devastating. The demise of the commercial industries have already made a mark on the coastal community and caused them to focus more efforts on sport fishing. The closures proposed would kill not only the local fishers but also the thousands and thousands of tourists drawn to the area for that very reason.
4. There is a huge domino effect that happens when you close one area to sportfishers, as was witnessed last year after closing the >40 fathom area to bottomfishing, thus creating more pressure on the inshore reefs and the blue/black rockfish.
5. Rather than close existing habitat, why not make more habitat for them to thrive in? (i.e. artificial reefs) They are proven and would not only reverse the stock decline but create MORE fishing opportunities, thus creating a win-win situation for everyone.

Every time you hear a plane fly over I'm sure you don't run for cover for fear it's dropping a bomb in your area, and thus

you shouldn't start closing the entire ocean because a few trawlers exceeded their catch limits, or because our neighbors (California) are having stock issues.

I appreciate you and your agencies trying to protect our fish, I just want to make sure we are using valid reasoning and not unnecessarily penalizing those who have done nothing wrong.

Thank you for your time and consideration,

**Rod Lee**

Concerned fisherman

**6900 SW 130<sup>th</sup> Ave.  
Beaverton, OR 97008**

**503-626-7264**

Cc: Hal Weeks(ODFW) and the PFMC

Pacific Fishery Management Council

**Subject:** [Fwd: [Fwd: Sport Bottom Fishing]]  
**From:** "John DeVore" <John.DeVore@noaa.gov>  
**Date:** Wed, 04 May 2005 10:03:08 -0700  
**To:** Kit Dahl <Kit.Dahl@noaa.gov>

Another one for the EFH agenda item in June.

----- Original Message -----

From: - Wed May 04 09:53:50 2005  
X-Mozilla-Status: 0001  
X-Mozilla-Status2: 00000000  
Return-Path: <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>  
Received: from [10.0.0.108] ([65.106.153.163]) by mercury.akctr.noaa.gov (Netscape Messaging Server 4.15 mercury Jun 21 2001 23:53:48) with ESMTTP id IFZ5FA00.EEI for <[John.DeVore@noaa.gov](mailto:John.DeVore@noaa.gov)>; Wed, 4 May 2005 09:49:58 -0700  
Message-ID: <[4278FD36.90103@noaa.gov](mailto:4278FD36.90103@noaa.gov)>  
Date: Wed, 04 May 2005 09:49:58 -0700  
From: PFMC Comments <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>  
Reply-To: [rcwenger@adelphia.net](mailto:rcwenger@adelphia.net)  
Organization: Pacific Fishery Management Council  
User-Agent: Mozilla Thunderbird 1.0 (Windows/20041206)  
X-Accept-Language: en-us, en  
MIME-Version: 1.0  
To: John DeVore <[John.DeVore@noaa.gov](mailto:John.DeVore@noaa.gov)>  
Subject: [Fwd: Sport Bottom Fishing]  
Content-Type: multipart/mixed; boundary="-----040602060506080604070307"

----- Original Message -----

Subject: Sport Bottom Fishing  
Date: Wed, 4 May 2005 10:48:18 -0400  
From: <[rcwenger@adelphia.net](mailto:rcwenger@adelphia.net)>  
To: [GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)  
CC: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov), [Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)

To Whom it May concern;

Please do not close bottom fishing to sport fisherman off the coast of Oregon. Areas listed as "Areas of Interest" and "Ecologically Important Areas". are important recreation areas for sport fishing, and there is no data that sport fishing has any negative impact. It is my understanding that so far decisions are based on Trawl Data only. This should not be the basis for restricting sport fishing. There are not huge numbers of sport fisherman, but the numbers represent a much bigger number of visitors to the coast of Oregon to do other activities. If the fishing is restricted unnecessarily, it will have a large negative impact on the economies of the coastal towns that are already in poor economic condition.

Please use sport fishing data, and Fishery based data to make such critical decisions on future sport fishing. This should be based on biological justification for an Area to be designated as Important or Critical, not opinion or data based on activities such as trawling when sport fishing is concerned.

Thank you for your consideration.  
Dick & Carolyn Wenger  
249 West Saint James Pl  
Longview, Washington  
360-577-5991

**Subject:** [Fwd: [Fwd: Comment on 2005 Pacific Coast GroundfishDEIS]]  
**From:** "John DeVore" <John.DeVore@noaa.gov>  
**Date:** Wed, 04 May 2005 10:04:07 -0700  
**To:** Kit Dahl <Kit.Dahl@noaa.gov>

June BB material under the EFH item.

----- Original Message -----

From: - Wed May 04 09:53:50 2005  
X-Mozilla-Status: 0001  
X-Mozilla-Status2: 00000000  
Return-Path: <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>  
Received: from [10.0.0.108] ([65.106.153.163]) by mercury.akctr.noaa.gov (Netscape Messaging Server 4.15 mercury Jun 21 2001 23:53:48) with ESMTTP id IFZ5GC00.9EV for <[John.DeVore@noaa.gov](mailto:John.DeVore@noaa.gov)>; Wed, 4 May 2005 09:50:36 -0700  
Message-ID: <[4278FD5C.3080009@noaa.gov](mailto:4278FD5C.3080009@noaa.gov)>  
Date: Wed, 04 May 2005 09:50:36 -0700  
From: PFMC Comments <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>  
Reply-To: <[Slabhunter@aol.com](mailto:Slabhunter@aol.com)>  
Organization: Pacific Fishery Management Council  
User-Agent: Mozilla Thunderbird 1.0 (Windows/20041206)  
X-Accept-Language: en-us, en  
MIME-Version: 1.0  
To: John DeVore <[John.DeVore@noaa.gov](mailto:John.DeVore@noaa.gov)>  
Subject: [Fwd: Comment on 2005 Pacific Coast GroundfishDEIS]  
Content-Type: multipart/mixed; boundary="-----090506050809080604050309"

----- Original Message -----

Subject: Comment on 2005 Pacific Coast GroundfishDEIS  
Date: Tue, 3 May 2005 13:27:11 EDT  
From: <[Slabhunter@aol.com](mailto:Slabhunter@aol.com)>  
To: <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
CC: <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Hello there,

I'm concerned about the perception that the trawl data is being used across the spectrum. Sport and charter fishers are much more selective due to the terminal gear used.

This "reality" is just like saying sportfishing impacts(we release unmarked fish without removing them from the water) are the same as the impactsof gillnets in the mainstem Columbia River.

I'm a volunteer with the Angler Education Program offered by WDFW. Impacts are minimized when people are taught the proper techniques. I believe this fact and the (positive) economic factors in rural communities should be given priority.

Regards,  
Hans M. Mak  
Shelton WA 98584

Pacific Fishery Management Council  
770 NE Ambassador Pl., Ste #200  
Portland, OR 97220-1834  
*MAY 4, 2005*

RECEIVED

MAY 05 2005

PFMC

Ladies and Gentlemen,

I am writing to express my concerns with several of the proposals being considered by the NFMS about closures to areas of the Oregon coast.

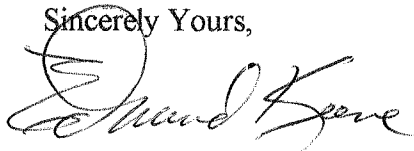
One proposal would ban all bottom-contact fishing. This would eliminate all bottom fishing including crabbing in those areas. That seems a very severe measure, especially based on the lack of good scientific evidence that sport fishing or crabbing has a big impact on the fishery.

Sport fishing has been the lifeblood of many small communities along the Oregon coast and represents a substantial infusion of money to local and the state economy.

Another proposal would close certain, "Ecologically Important Areas", to all fishing. Who decides what areas and what data supports that sport fishers have impacted the fishery. Sport fishermen have historically been very responsive in following guidelines for bag limits, size and gender identification. Little or no EIS data is based on sport fishing. It is based almost exclusively on Trawl Data.

Please take into account when you consider the current closure proposals that the sport fishing fleet does represent a major influence on the economy and does virtually no harm to the ecology or the fishery.

Sincerely Yours,



Edmund Keene  
920 SW 13<sup>th</sup> Ave.  
Portland, OR 97205

Email; [ekeene@ecomphotos.com](mailto:ekeene@ecomphotos.com)

**Subject:** [Fwd: Groundfish EIS comments]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Fri, 06 May 2005 10:16:50 -0700  
**To:** Kit Dahl <Kit.Dahl@noaa.gov>  
**CC:** John DeVore <John.DeVore@noaa.gov>

----- Original Message -----

**Subject:** Groundfish EIS comments  
**Date:** Thu, 5 May 2005 21:34:38 -0700  
**From:** Dean Ferguson <[ciferguson37733@charter.net](mailto:ciferguson37733@charter.net)>  
**Reply-To:** Dean Ferguson <[ciferguson37733@charter.net](mailto:ciferguson37733@charter.net)>  
**To:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Hi, my name is Dean Ferguson. I live in Astoria, OR and would like to comment on the Groundfish EIS. I personally participate in sportsfishing activities off the Oregon coast out of Astoria. I understand the need to rebuild fish stock, but we must find a way to work together without the preservationist agenda. We need to have open dialog between all parties and understand that we are all interested in the same outcome - healthy fish stocks. I fail to see how preventing any contact with the ocean bottom will accomplish this goal. This action seems more like an attempt to enact legislature to prevent all fishing, boating, etc. I DO NOT support this. I support healthy dialog that will result in healthy fish stocks.

Dean Ferguson  
37733 Highway 30  
Astoria, OR 97103  
503-325-8474

Pacific Fishery Management Council

**Subject:** [Fwd: Comment on 2005 Pacific Coast Groundfish DEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Mon, 09 May 2005 16:48:11 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comment on 2005 Pacific Coast Groundfish DEIS  
**Date:** Mon, 9 May 2005 16:26:08 -0700  
**From:** Fischer, Rhonda <[rhonda.fischer@oregonstate.edu](mailto:rhonda.fischer@oregonstate.edu)>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>, <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>, <[Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)>

To: Maryann Nickerson

As a third generation commercial fisherman and long time Sea Grant Extension Educator, I have a number of comments on the Groundfish Essential Fish Habitat Draft Environmental Impact Statement (Groundfish EFH/EIS).

- I strongly support protecting fish habitat and using the tool of Habitat Areas of Particular Concern (HAPC) is important. I support the Council's preferred alternatives, B.2, B.3, B.4 and B.6.
- Under Alternative C.12, C.13 and C.14 there is only one near shore area listed for Oregon. That area runs from Coos Bay south to Bandon and out to approximately 80 fathoms. This area is rarely trawled because of rough bottom and communication cables, thus restricted bottom trawling (C.12) would have little affect. But this area is the only area available to recreational groundfish fleet and a small number of hook and line groundfish commercial vessels. Alternative C.13 would eliminate those fisheries, a real blow to Coos Bay and Bandon. Alternative C.14 would also cut out a large portion of very productive salmon trolling grounds out of Coos Bay and Bandon. A double blow to the communities.
- Alternative C.9 (option 9.8) would prohibit dingle-bar gear (troll groundfish gear). I have fished this gear for lingcod for over 20 years and prohibiting it would be a real mistake. Dingle-bar gear is very selective for lingcod. If setup right rockfish catch is nearly zero. The gear is primarily used by salmon trollers allowing an alternative fishery during salmon closures. Because the fish are handled carefully, one at a time, landed price is double trawl caught and is usually sold to niche markets. The bottom impact is minimal.

Maybe there is a misconception of what the gear is and how it is used. The dingle-bar is a 5 to 7 foot, 1½ inch diameter steel bar and replaces the lead cannonball weight. The trolling gear is a string of 5 or 6 weighted jig hooks spread six feet apart and floats are used to keep the gear off the bottom. The dingle-bar is lowered to the bottom with a salmon gurdie and then raised and lowered to meet bottom conditions. The dingle-bar is not drug along the bottom, but raised slightly off the bottom and only allowed to occasionally contact bottom. The jig line does not hit the bottom as it is set two to three feet above the bottom of the dingle-bar. The gear is towed at 2.0 to 2.5 knots with only occasional bottom contact (maybe every 100 feet) with a 1½ diameter footprint bottom impact is very minimal.

Instead of prohibiting this gear I think the Council and NMFS should be encouraging gear that is selective, has minimal impact, is available for small boats and produces a high value product.

Thank you

Paul Heikkila  
F/V Andante  
786 S. 1<sup>st</sup> Avenue  
Coquille OR 97423  
(541) 396-3096

**Subject:** [Fwd: Offshore Habitat]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:30:55 -0700  
**To:** Jim Seger <Jim.Seger@noaa.gov>

----- Original Message -----

**Subject:** Offshore Habitat  
**Date:** Tue, 10 May 2005 08:05:19 -0700  
**From:** Dave and Carole Needham <needham@casco.net>  
**To:** <GrounfishEFHDEIS.nwr@noaa.gov>  
**CC:** <pfmc.comments@noaa.gov>

Dear Mr. Lohn,

When I was a child living here in Seal Rock, Oregon, I was a member of a group named, "Coast Watch." At that time, we were observing and recording the activity of aircraft over the area. Now, as a dedicated member of Oregon Shores CoastWatch and a life-long resident of the central Oregon coast, I urge you to do all in your power to protect the marine habitat that is so critical in the recovery of natural marine ecosystems.

Being a life-long resident also means I realize the importance of fishing to this community. However, I am also aware that no single species can be lost without contributing to the loss of another, eventually impacting the very quality of human life that we are all eager to maintain.

That said, please do all you can to:

1. Increase protection for sensitive habitat types that are essential to groundfish productivity.
2. Assist fishermen in changing to less destructive gear.
3. Protect a representative sample of unique habitat types from all types of fishing impacts.
4. Create a network of reference reserves, in order to aid understanding of fishery impacts on all types of habitat.
5. Develop an ecosystem-based management plan that truly protects the long-term health of the marine environment.
6. Prepare and apply some precautionary management principles, in cases where information needed for decision making is unavailable.

Sincerely Yours, Carole Needham

Pacific Fishery Management Council



**Subject:** [Fwd: Comment on 2005 Pacific Coast GroundfishDEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:31:43 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comment on 2005 Pacific Coast GroundfishDEIS  
**Date:** Mon, 9 May 2005 22:09:17 -0700  
**From:** Janice and Harry Green <[hjgreen@jeffnet.org](mailto:hjgreen@jeffnet.org)>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
**CC:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>, <[Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)>

May 7, 2005

Mr. D. Robert Lohn  
Regional Administrator, NOAA Fisheries  
c/o Maryann Nickerson  
7600 Sandy Point Way, NE  
Bin C15700  
Seattle, WA 98115-0070

Re: Comment on Groundfish EFH DEIS

Dear Mr. Lohn:

Your staff and the Pacific Council are to be congratulated for such an intelligent and comprehensive approach to providing a rational basis for analyzing fisheries conditions and their effects on essential habitat. If what I say indicates a limited comprehension of what exists in the DEIS, I will be happy to be corrected, and will make my excuses beforehand: It is an extensive document which I am not sure I comprehend.

My concern is an evident "pass" on analyzing the impacts of sportfisheries. I believe I saw references to Appendix A, which had an Appendix 13. But all I ever found was a perfunctory textual re-reading of MRFSS data graphs. There was no attempt to resolve any (startling) data inconsistencies. There was no attempt to use better state data. There seemed to be no attempt to sort salmon trolling and tuna fishing from bottom fishing, though I am not sure about this last from the text. There was no attempt to even discuss the abundance depressions where groundfish are accessible to small boats (increasing in severity as a point of access is approached). I am certain there is literature on this subject. There was so far as I know, no data search, or even discussion, of the effects of estuary fishing on stocks which use estuaries for reproduction. There is no discussion of the effects of the livefish fishery burgeoning in the past 10 years in traditional sport groundfish territory (also leading to depletion and most likely contributing to the "port effect"). Surely there are some measures somewhere of the likely impact of mooching, of jigging on the bottom with a weight, etc. Or at least we could look forward to some attempts to quantify those impacts.

In a time when some media report how sportfishing is more responsible for fisheries depletion than commercial fishing (!), and when many organizations concerned with sustainable fisheries seem to go out of their way to mention only sustainable commercial fishing, I believe that sportfishing needs to be brought up to the point of having an important place in every discussion. Since most sportfishing probably does have less impact than most commercial fishing, and in many cases an equal or greater community economic impact, it

seems clear that one way to minimize the impact on EFH would be to allocate more fish to sportfishers. This would have the added benefit of extracting a greater economic benefit from the limited allowable catches of some of the more constraining species of groundfish. While I realize that such views might not meet with enthusiasm in some quarters, it seems to me that such ideas at least warrant some discussion in a comprehensive review.

Sportfishers do need to consider what impacts they are having, and perhaps how best to minimize them. While I might think to myself that the truth might be rather benign, right now we are left with no data with which to argue any point in any direction. Sportfishers and regulators need to get started somewhere.

Very truly yours,

Janice Green  
Oregon Sport Advisory Committee

cc via e-mail  
Marine Program, ODFW  
Pacific Fishery Management Council

Pacific Fishery Management Council

**Subject:** [Fwd: Comment on 2005 Pacific Coast GroundfishDEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:31:43 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comment on 2005 Pacific Coast GroundfishDEIS  
**Date:** Mon, 9 May 2005 22:09:17 -0700  
**From:** Janice and Harry Green <[hjgreen@jeffnet.org](mailto:hjgreen@jeffnet.org)>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
**CC:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>, <[Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)>

May 7, 2005

Mr. D. Robert Lohn  
Regional Administrator, NOAA Fisheries  
c/o Maryann Nickerson  
7600 Sandy Point Way, NE  
Bin C15700  
Seattle, WA 98115-0070

Re: Comment on Groundfish EFH DEIS

Dear Mr. Lohn:

Your staff and the Pacific Council are to be congratulated for such an intelligent and comprehensive approach to providing a rational basis for analyzing fisheries conditions and their effects on essential habitat. If what I say indicates a limited comprehension of what exists in the DEIS, I will be happy to be corrected, and will make my excuses beforehand: It is an extensive document which I am not sure I comprehend.

My concern is an evident "pass" on analyzing the impacts of sportfisheries. I believe I saw references to Appendix A, which had an Appendix 13. But all I ever found was a perfunctory textual re-reading of MRFSS data graphs. There was no attempt to resolve any (startling) data inconsistencies. There was no attempt to use better state data. There seemed to be no attempt to sort salmon trolling and tuna fishing from bottom fishing, though I am not sure about this last from the text. There was no attempt to even discuss the abundance depressions where groundfish are accessible to small boats (increasing in severity as a point of access is approached). I am certain there is literature on this subject. There was so far as I know, no data search, or even discussion, of the effects of estuary fishing on stocks which use estuaries for reproduction. There is no discussion of the effects of the livefish fishery burgeoning in the past 10 years in traditional sport groundfish territory (also leading to depletion and most likely contributing to the "port effect"). Surely there are some measures somewhere of the likely impact of mooching, of jigging on the bottom with a weight, etc. Or at least we could look forward to some attempts to quantify those impacts.

In a time when some media report how sportfishing is more responsible for fisheries depletion than commercial fishing (!), and when many organizations concerned with sustainable fisheries seem to go out of their way to mention only sustainable commercial fishing, I believe that sportfishing needs to be brought up to the point of having an important place in every discussion. Since most sportfishing probably does have less impact than most commercial fishing, and in many cases an equal or greater community economic impact, it

seems clear that one way to minimize the impact on EFH would be to allocate more fish to sportfishers. This would have the added benefit of extracting a greater economic benefit from the limited allowable catches of some of the more constraining species of groundfish. While I realize that such views might not meet with enthusiasm in some quarters, it seems to me that such ideas at least warrant some discussion in a comprehensive review.

Sportfishers do need to consider what impacts they are having, and perhaps how best to minimize them. While I might think to myself that the truth might be rather benign, right now we are left with no data with which to argue any point in any direction. Sportfishers and regulators need to get started somewhere.

Very truly yours,

Janice Green  
Oregon Sport Advisory Committee

cc via e-mail  
Marine Program, ODFW  
Pacific Fishery Management Council

Pacific Fishery Management Council



**OREGON STATE  
UNIVERSITY**

**Dr. Mark A. Hixon  
Department of Zoology  
Oregon State University  
Corvallis, OR 97331-2914**

phone: 541-737-5364    fax: 541-737-0501    e-mail: [hixonm@science.oregonstate.edu](mailto:hixonm@science.oregonstate.edu)    <http://www.onid.orst.edu/~hixonm/index.htm>

10 May 2005

Mr. D. Robert Lohn, Regional Administrator  
National Marine Fisheries Service  
7600 Sand Point Way  
Seattle, WA 98115-0070

re: Comment on 2005 Pacific Coast Groundfish DEIS

Dear Mr. Lohn:

I wish to endorse the comprehensive review of the EFH-DEIS submitted by an independent panel of academic scientists appointed by the Pacific Marine Conservation Council: Dr. Selina Heppell of Oregon State University (Chair), Dr. Peter Auster of the University of Connecticut, Dr. Don Gunderson of the University of Washington, Dr. Ralph Larson of San Francisco State University, and Dr. Les Watling of the University of Maine.

All of these marine scientists are respected experts on EFH-related issues, both regionally and nationally, ranging from spatially explicit population dynamics (Heppell), to groundfish habitat assessment (Auster), to West Coast groundfisheries (Gunderson), to rockfish recruitment and population structure (Larson), to benthos and biogenic habitat (Watling).

As the sole West Coast academic fish biologist serving on the Marine Protected Areas Federal Advisory Committee (<http://mpa.gov/>), I find the report by this panel of experts to be objective, thoughtful, and reasonable. I fully endorse their recommendations regarding the EFH-EIS alternatives, and urge NMFS and PFMC to consider their assessment carefully.

Thank you for considering my suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Hixon'.

Mark A. Hixon  
Professor

cc: Oregon Department of Fish and Wildlife  
Pacific Fisheries Management Council  
Pacific Marine Conservation Council

**Subject:** [Fwd: Comments 2005 Groundfish DEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:26:13 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comments 2005 Groundfish DEIS  
**Date:** Tue, 10 May 2005 17:07:48 -0700  
**From:** Frank Quinn <[marfran@harborside.com](mailto:marfran@harborside.com)>  
**To:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Mr. Robert D. Lohn, Regional Administrator  
National Marine Fisheries Service, Northwest Region

Dear Mr. Lohn:

In developing policy for protecting marine habitats and managing offshore fishing within federal waters, surely two of the primary concerns of the Pacific Fisheries Management Council will be how to promote sustainable fishing to meet the needs of our growing population, and how to advise and assist fishermen to develop practices that assure a viable future for the industry.

In our area, where groundfish are particularly important, the fishing industry is already hurting and has been in serious decline for years. Overfishing and the use of bottom trawl nets and other heavy fishing gear have depleted fish stocks and caused much damage to the marine habitats the fish depend on for sustenance. Effective measures to protect those critical habitats and to regenerate and restore fish populations are essential if commercial fishing is to have a future here along the Pacific Coast.

We urge strongly that the Council adopt policies that will increase protection of sensitive habitats needed for the replenishment of groundfish stocks, and that representative sample habitat areas be reserved and protected from all types of fishing impacts for future study and as a source for regenerating fish populations. We hope the Council will be able to assist fishermen to develop and employ fishing gear and techniques that are less destructive than those that have caused so much damage in the recent past.

Lastly, we believe that an ecosystem-based management plan that truly protects the long-term health of the marine environment offers the only promise for the future of fishing here on the West Coast, both as an important local industry, and as an essential economic resource for the country as a whole.

Sincerely,

Francis E. Quinn and Marjorie Feldman

425 Bandon Ave., SW

Bandon, OR 97411

Pacific Fishery Management Council

**Subject:** [Fwd: "Comments 2005 Groundfish DEIS"]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:25:41 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** "Comments 2005 Groundfish DEIS"  
**Date:** Tue, 10 May 2005 19:48:04 -0700  
**From:** Karen Meyer <karen@greenfireproductions.org>  
**To:** [GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)  
**CC:** [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov), [Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)

May 11, 2005

Mr. D. Robert Lohn, Regional Administrator  
National Marine Fisheries Service, Northwest  
Region  
Point Way NE, BIN C15700  
Seattle, WA 98115-007

;

7600 Sand

Dear Mr. Lohn:

I attended the recent Essential Fish Habitat meeting in Newport, Oregon at the end of April and wanted to submit the following comments for your consideration for decisions that will be made on the Groundfish Essential Fish Habitat Draft Environmental Impact Statement (DEIS).

Because the DEIS is so complex, the alternatives quite numerous, and the fact that I do not feel qualified to comment on specific alternatives, I will make more general comments and suggestions to the Pacific Fishery Management Council.

Based on the meeting in Newport, I am concerned that the specific needs of fishermen will carry more weight than the scientific knowledge about the state of groundfish and their potential habitat protection needs. I encourage you to strongly consider the scientific recommendations.

In general, I feel it is imperative for the PFMC to take a precautionary approach to management of Pacific groundfish, while we improve our limited understanding of the impacts of fishing on diverse habitats and the ability of habitats to recover from fishing impacts. In fact, the Oregon State of the Environment Report 2000 states, "the most significant risk to marine fisheries is our insufficient understanding of the complex interactions of natural and human caused changes in stock health." It is crucial, therefore, that the PFMC err on the side of caution in protecting and restoring Pacific groundfish and habitat.

I strongly encourage the PFMC to consider the need for connectivity between habitats, so that these habitat reserves can provide the added benefit of enhancing groundfish populations. I encourage you to include a network of research reserves in PFMC's effort to designate, protect and understand present and future EFH. By monitoring and analyzing impacts and effectiveness in these reference sites, the PFMC can glean new knowledge, engage in adaptive management and move forward more confidently with fishery management, basing its decisions on sound science.

Utilizing the principles of ecosystem-based management, the PFMC should develop an ecologically based management plan that considers the entire ecosystem, including humans, and protects the long-term health of the marine environment. This plan should think beyond protection of single species, and consider the inherently interrelated nature of all marine species and habitat types, as well as potential past, present, future and cumulative human impacts on these environments.

I feel it is important that all possible EFH protection measures be adopted in the near-term, rather than deferring measures for future understanding. This precautionary implementation should then be modified accordingly, based on the principles of adaptive management, as new information is gathered, during the mandatory five-year review process.

Overall, I believe it is important to:

- \* manage and make these decisions on a precautionary principle,
- \* increase protection for sensitive habitat types such as kelp, corals and sponges that are essential to groundfish productivity,
- \* protect a representative sample of unique habitat types from all types of fishing impacts,
- \* include connectivity as a criteria for designating EFH - so that the habitat reserves have the potential to replenish groundfish stocks,
- \* make it easier for fishermen to change to less destructive gear,
- \* establish a network reference reserves in order to better understand fishery impacts on all habitat types.

Thank you for your efforts to protect essential fish habitat for Pacific groundfish.

Karen Anspacher-Meyer

--

Karen Anspacher-Meyer

Executive Director

Green Fire Productions

[karen@greenfireproductions.org](mailto:karen@greenfireproductions.org)

[www.greenfireproductions.org](http://www.greenfireproductions.org)

541-486-4070 fax 541-486-4010

P.O. Box 14906, Portland, OR 97293

Pacific Fishery Management Council

**Subject:** [Fwd: Comments 2005 Groundfish DEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:24:55 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comments 2005 Groundfish DEIS  
**Date:** Tue, 10 May 2005 20:41:01 -0700  
**From:** Ann Littlewood <[alittlew@europa.com](mailto:alittlew@europa.com)>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
**CC:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Oregon needs a sustainable fishery.

When you develop the Groundfish Essential Fish Habitat Draft Environmental Impact Statement (DEIS), please use the following strategies:

Increase protection for sensitive habitat types such as kelp, corals and sponges that are essential to groundfish productivity,  
Protect a representative sample of unique habitat types from all types of fishing impacts,  
Make it as easy as possible for fishermen to change to less destructive gear,  
Establish a network of reserves  
Create an ecosystem-based management plan that truly protects the long-term health of the marine environment  
Use precautionary management principles where information needed for decision making is unavailable.

I am reading a lot of very dire news about the state of the world's oceans. The US should be a leader in protecting and restoring them. Act while we can make a difference.

Ann Littlewood  
Portland, OR

Pacific Fishery Management Council

**Subject:** [Fwd: EFH Comments]  
**From:** "PFMC Comments"  
**Date:** Thu, 12 May 2005 09:19:24 -0700  
**To:** John DeVore  
**CC:** Kit Dahl

----- Original Message -----

**Subject:**EFH Comments  
**Date:**Wed, 11 May 2005 13:50:24 -0500  
**From:**KELLEY RETHERFORD <[excalibur@carrollsweb.com](mailto:excalibur@carrollsweb.com)>  
**Reply-To:**<[excalibur@carrollsweb.com](mailto:excalibur@carrollsweb.com)>  
**To:**<[groundfishefhdeis.nwr@noaa.gov](mailto:groundfishefhdeis.nwr@noaa.gov)>  
**CC:**<[Pfmc.comments@noaa.gov](mailto:Pfmc.comments@noaa.gov)>, <[Hal.weeks@state.or.us](mailto:Hal.weeks@state.or.us)>

Michael Retherford  
880 NE Sturdevant Rd.  
Toledo, OR 97391

May 10, 2005

Mr. Jim Lohn  
National Marine Fisheries Service  
7600 Sandpoint WY NE  
Seattle, WA 98115.

Dear Mr. Lohn,

I am and owner/operator of a 65' trawler/crabber fishing out of Newport, Oregon. I have been in the west coast fisheries since the mid 1980s and have observed the increasing complexity of management regulations that have been imposed on the fishing industry by legislation and litigation. I hope NMFS and the PFMC continues to support the current efforts toward development of IQs, as this is likely the only way we will stabilize and improve the wealth of the resource and the health of the coastal fishing industry. I do not feel that the current "habitat" related amendments will do much enhance fisheries management. Nearly all of the proposed measures require greater amounts of funding and manpower than that which is currently available. The history of management has shown that there is little enthusiasm for funding initiatives such as those proposed by government, so the onus of funding falls to the user.

Essential fish habitat is a difficult subject to define precisely, but if the intent is to define an area that habitat alteration effects on fish be considered then the PFMC alternative A.3 would be the most logical alternative.

I concur with the PFMC's proposal B2 to establish estuary areas as HAPCs. Research has shown that these are the areas that are very productive for most of our fished species and critical for the early life of crab and shrimp. I am not in favor of additional closures on the continental shelf and slope. Many of these areas have already been closed to fishing, some for up to 6 years. During that time there have been no efforts to evaluate if these closures were beneficial, detrimental, or neutral for fish production. I would hope that NMFS and the PFMC refrain from sequestering additional grounds without adequate scientific study. Without any supporting evaluation of the effects of fishing on offshore rocky reefs there is no basis for this option. There are already tools in place to control fishing in these habitats and additional regulations will only be redundant and add additional unnecessary expenses to fishermen.

The alternatives presented for item C are all problematic in that it is not clear how these measures will mitigate fishing effects. The base years of 2000-2002 are questionable measures of fishing. One must remember that the fishery in those years was already significantly impacted by trip limits and area closures. In fact the entire west coast trawl fishery is much different today than in the past. Since 1994 75% of trawl effort has been removed by limited entry permit retirement, vessel buyback program and migration of part of the fleet to Alaska. This along with changes in fishing practices has significantly reduced fishing effects. An ODFW study of fishing effort showed less than 10% of the grounds are actively fished. This result is in line with other studies that show trawl fisheries in general only trawl 10-15% of available habitat.

I have also actively participated in NMFS West coast trawl surveys and habitat mapping projects. I can attest that observations of many untrawled areas show barren bottom strewn with bare cobbles and stones, while trawled areas have rich bottom fauna.

My concern for selection of any of the items in item C has impacts on all bottom gear including crab traps. Again, without research there is no data to evaluate the effects of these permanent changes. Given that there already have been major reductions in trawl impacts and that we lack objective data to base decisions on it would be prudent to take an incremental approach to develop meaningful regulatory measures. All of the needed action can be taken within the normal regulatory process and does not require a separate program.

Alternative D.1 is the appropriate alternative for research and monitoring. All of the proposed alternatives are added regulations on fishermen; however, it is not clear how these will further EFH objectives. Logbooks and VMS should be addressed in the normal regulatory process, since all of the alternatives, except research reserves, relate to management of catch and effort. In the case of research reserves, it is premature for the Council to establish a "reserve system" without consideration of the effectiveness of this system and its affect on fishing. NMFS has a scientific study group working on developing an approach to studying reserves. The PFMC should wait until these studies are prepared before considering reserves. However, there is a pressing need to quantify fishing effects on habitat if, in fact, there are any significant fishing effects to habitats currently fished.

Sincerely yours,

Michael Retherford  
Captain, F.V. Excalibur

Cc: PFMC  
Hal Weeks, ODFW

---

Sent via the WebMail system at [carrollsweb.com](http://carrollsweb.com)

Pacific Fishery Management Council

**Subject:** [Fwd: Comment on 2005 Pacific Coast Groundfish DEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:18:07 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comment on 2005 Pacific Coast Groundfish DEIS  
**Date:** Wed, 11 May 2005 14:19:08 -0700  
**From:** Leesa <[poort@carrollswab.com](mailto:poort@carrollswab.com)>  
**To:** [GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)  
**CC:** Hal Weeks <[Hal.Weeks@state.or.us](mailto:Hal.Weeks@state.or.us)>, [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Comment on 2005 Pacific Coast Groundfish DEIS  
The following comment is submitted for the record.

I support the Council taking action to protect essential fish habitat. "No action" should not be an option.

I support Alternative C.12. I believe it is important that the Council move quickly to protect EFH before further damage is done by trawl gear. I encourage the Council to review the areas proposed carefully, to ensure they are large enough and encompass all of the EFH that could be damaged by trawl gear.

I believe an appropriate habitat protection measure that encompasses several of the alternatives would be to close all state territorial sea (state waters) to trawl gear to protect essential fish habitat.

I do not support C.11 as written because I believe sablefish must be included in this alternative. Sablefish habitat should be protected from damaging gear. This list of alternatives is about protecting the fish, not the economic benefits one gear group holds over another.

Thank you for the opportunity to comment.

Leesa Cobb  
Communication Coordinator  
Port Orford Ocean Resource Team  
PO Box 679  
Port Orford, OR 97465  
541-332-0627  
[poort@carrollswab.com](mailto:poort@carrollswab.com)

Pacific Fishery Management Council

**Subject:** [Fwd: Comments 2005 Groundfish DEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:18:41 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comments 2005 Groundfish DEIS  
**Date:** Wed, 11 May 2005 13:49:17 -0700  
**From:** Jana Fussell <[JANAFUSSELL@msn.com](mailto:JANAFUSSELL@msn.com)>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
**CC:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

**Please accept the following comments:**

I feel that it is important that the Pacific Fisheries Management Council take action to:

- \* increase protection for sensitive habitat types such as kelp, corals and sponges that are essential to groundfish productivity,
- \* protect a representative sample of unique habitat types from all types of fishing impacts,
- \* make it easier for fishermen to change to less destructive gear,
- \* establish a network reference reserves in order to better understand fishery impacts on all habitat types,
- \* develop an ecosystem-based management plan that truly protects the long-term health of the marine environment.

I favor these goals and strongly urge application of "precautionary management principles" in all cases where information needed for decision making is unavailable.

Thank you for considering these comments.

Jana Fussell  
924 Cumberland Road  
Lake Oswego, Oregon 97034

Pacific Fishery Management Council

**Subject:** [Fwd: groundfish regulations]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:21:17 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** groundfish regulations  
**Date:** Wed, 11 May 2005 07:08:47 -0700  
**From:** peter frank <[pfrank@darkwing.uoregon.edu](mailto:pfrank@darkwing.uoregon.edu)>  
**To:** [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)  
**CC:** [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

As a retired marine ecologist, I'm aware that, for decades, protection, even when intended, has fallen victim to more immediate economic pleas from fisherman. Please do protect the habitat of groundfish and manage the resource for the long run. If that means protected areas, that has proven useful where it's been tried-- not very often. Sincerely yours,  
Peter Frank  
Prof of Biology Emeritus  
Univ. of Oregon  
2009 Elk  
Eugene, OR 97403

Pacific Fishery Management Council

**Subject:** [Fwd: Comments on 2005 Groundfish DEIS]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Thu, 12 May 2005 09:29:26 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

----- Original Message -----

**Subject:** Comments on 2005 Groundfish DEIS  
**Date:** Tue, 10 May 2005 13:59:21 -0400  
**From:** George Alderson <[george7096@comcast.net](mailto:george7096@comcast.net)>  
**To:** <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>  
**CC:** <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Mr. D. Robert Lohn, Regional Administrator  
National Marine Fisheries Service, Northwest Region

Dear Mr. Lohn:

Please consider our comments which follow in reaching decisions on the 2005 groundfish DEIS. I (George) grew up in Oregon, and my sister's family still lives there. Here in Maryland we consume fish from the Northwest that arrive through commercial channels.

We ask NMFS to adopt a top priority of assuring a sustainable, natural fishery resource. We would like to see increased protection for sensitive habitat such as kelp, sponges and corals, essential factors to support groundfish populations. We ask NMFS to adopt policies that will encourage fishing operators to adopt fishing gear that is less destructive to the habitat and to non-target species of fish and invertebrates.

NMFS should identify examples of the main habitat types and protect reserved areas to serve as ecological benchmarks, somewhat like using exclosures and research natural areas in terrestrial habitat management. Reference reserves should be established to give researchers a basis for identifying the impacts of fisheries on all the habitat types in the region.

At any time when essential information for decisionmaking is lacking, "precautionary management principles" should be used.

NMFS should adopt a management plan based on the natural ecosystems. This is an essential foundation for managing fisheries over the long term, so we will have a productive marine fishery in the future.

Thank you for considering our views.

Sincerely,  
George & Frances Alderson  
112 Hilton Ave.  
Baltimore, MD 21228-5727  
Tel. 410-788-7096  
Email: [george7096@comcast.net](mailto:george7096@comcast.net)

Pacific Fishery Management Council

**Subject:** Mr. D. Robert Lohn, Regional Administrator  
**From:** "Karen Ashford" <ashfordk@ohsu.edu>  
**Date:** Tue, 10 May 2005 10:28:10 -0700  
**To:** GroundfishEFHDEIS.nwr@noaa.gov

Mr. D. Robert Lohn, Regional Administrator  
National Marine Fisheries Service, Northwest Region  
7600 Sand Point Way NE, BIN C15700  
Seattle, WA 98115-007

and Pacific Fishery Management Council.

MY OPINION: I absolutely support sustainable fishing in the Pacific Ocean off of the Oregon coast. I have lived in Oregon for 56 years, my entire life, and want our state to be completely resource sustainable- on land and in our oceans.

CONCERNING: Groundfish Essential Fish Habitat Draft Environmental Impact Statement (DEIS).

I believe it is EXTREMELY important that the Pacific Fisheries Management Council take action to:

- \* increase protection for sensitive habitat types such as kelp, corals and sponges that are essential to groundfish productivity,
- \* protect a representative sample of unique habitat types from all types of fishing impacts,
- \* make it easier for fishermen to change to less destructive gear,
- \* establish a network reference reserves in order to better understand fishery impacts on all habitat types,
- \* develop an ecosystem-based management plan that truly protects the long-term health of the marine environment.

I strongly believe we need to apply "precautionary management principles" in all cases where information needed for decision making is unavailable.

**Subject:** Re: Comment on Pacific coast groundfish EFH DEIS

**From:** "BARBARA GREEN" <cgbg@clatskanie.com>

**Date:** Thu, 21 Apr 2005 22:13:23 -0700

**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

CAN YOU HELP OUT? THERE ARE 4 PROPOSED LNG PLANTS IN THE SITING PROCESS ON THE LOWER COLUMBIA RIVER. PLEASE SEE [www.columbiarivervision.org](http://www.columbiarivervision.org)

THANK YOU,

BARBARA L GREEN

[cgbg@clatskanie.com](mailto:cgbg@clatskanie.com)

----- Original Message ----- From: <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>

To: <[cgbg@clatskanie.com](mailto:cgbg@clatskanie.com)>

Sent: Thursday, April 21, 2005 10:02 PM

Subject: Re: Comment on Pacific coast groundfish EFH DEIS

Your comments have been received by NOAA Fisheries regarding the Pacific Coast Groundfish FMP Essential Fish Habitat Draft EIS. Thank you for your response.

**Subject:** proposed lng

**From:** "BARBARA GREEN" <cgbg@clatskanie.com>

**Date:** Sun, 1 May 2005 12:57:05 -0700

**To:** "John White" <John.White@state.or.us>

HELLO,

THIS LETTER IS TO STATE THAT I AM TOTALLY AGAINST PLACING ANY LNG FACILITIES ON OR ABOUT THE LOWER COLUMBIA RIVER.....FROM CLATSKANIE TO WARRENTON.

WITH THE AVAILABILITY OF BIO FUEL, THERE IS ABSOLUTELY NO REASON TO FURTHER EXPLOIT FOSSIL FUEL IN ANY WAY SHAPE OR FORM.

RESPECTFULLY,

BARBARA L GREEN

[cgbg@clatskanie.com](mailto:cgbg@clatskanie.com)

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Judge Roy Bean <bigdog@hotmail.com>

**Date:** Wed, 13 Apr 2005 13:04:22 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,  
Hells Bells, people, leave the biology to the biologists and get the blazes out of the silly petition business! What's wrong with you people that you can't let a day go by without protesting some damn thing? I say we tell the "Oceana" crowd to get jobs and stop harassing honest folks!  
Judge Roy Bean  
Yes

Georgetown, DC 20005

**Subject:** Marine sanctuaries

**From:** <bernie@e-z.net>

**Date:** Wed, 4 May 2005 07:44:45 -0700

**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

Dear Sirs,

Please do not continue to bow to special interest groups who are pressuring you to consider marine sanctuaries. This is the last thing we need on the west coast to continue our economic slide into oblivion. Over regulation such as this takes the pure joy out of fishing as you must be an expert lawyer to interpret the laws and a master sailor to know where, when and why you cannot fish in a certain area.

This year in Oregon a knee jerk reaction closed the Stonewall Banks off of Newport to bottom fish in what is referred to as a control zone. It is obvious what is happening here that a sanctuary is trying to be set up for no good reason. There have been no credible scientific studies to prove that the little Orange guys are in danger or should even be considered for a listing. Very little is known about these species and how they breed. I would suggest a study be proposed to get the reality check we all deserve not just an assumption.

Environmentalists want to keep us all in a box and evidently have no joy in their lives to speak of but to make the rest of the population miserable and angry. I am angry that this proposal has even been given merit and or consideration. Just what are we thinking here?

I would urge all of you to think this proposal through carefully and weigh the ramifications both economically and recreationally. Thank you for listening and I appreciate your time

Sincerely,

Bernie C. Buckle  
10004 SE Foster Rd  
Portland OR 97266  
503 775 6585

**Subject:** Comments on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Jordan Epstein <yaakovm@northwest.com>

**Date:** Mon, 9 May 2005 11:57:43 -0700

**To:** "groundfishefhdeis.nwr@noaa.gov" <groundfishefhdeis.nwr@noaa.gov>

**CC:** "nepa.comments@noaa.gov" <nepa.comments@noaa.gov>

Mr. D. Robert Lohn, Regional Administrator  
National Marine Fisheries Service, Northwest Region  
7600 Sand Point Way NE, BIN C15700  
Seattle, WA 98115-007

Dear Mr. Lohn,

As a member of the Oregon Shores Conservation Coalition, and as a person who regularly monitors a mile along the Oregon coast, I am very concerned about the draft EIS and what alternatives it recommends. Like our land-based resources, our oceans are in trouble: we as a civilization have to do a better job of protection. To that end, I strongly suggest that your recommendations include the following.

\* Increase protection for sensitive creatures like kelp, corals, and sponges that are essential to groundfish productivity.

\* Protect a representative sample of unique habitat types from all types of fishing impacts.

\* Make it as easy as possible for the fisheries industry to switch to less destructive fishing methods.

\* Establish a network of reference reserves to study and better understand fishing impacts on all habitat types.

\* Develop a management plan that is based upon ecosystem values, not economic ones. Aim to protect the long-term health of the marine environment.

\* Apply the "precautionary principle" in all cases where information needed for decision making is unavailable. Don't gamble with the viability of this unique and precious resource.

Thank you very much for considering my suggestions.

Sincerely yours,

Jordan Epstein  
6243 SW 47th Place  
Portland, OR 97221

c: Susan A. Kennedy  
NOAA Strategic Planning Office

**Subject:** Comment on 2005 Pacific Coast GroundfishDEIS  
**From:** "Dean Ferguson" <ciferguson37733@charter.net>  
**Date:** Thu, 5 May 2005 21:33:49 -0700  
**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

Hi, my name is Dean Ferguson. I live in Astoria, OR and would like to comment on the Groundfish EIS. I personally participate in sportsfishing activities off the Oregon coast out of Astoria. I understand the need to rebuild fish stock, but we must find a way to work together without the preservationist agenda. We need to have open dialog between all parties and understand that we are all interested in the same outcome - healthy fish stocks. I fail to see how preventing any contact with the ocean bottom will accomplish this goal. This action seems more like an attempt to enact legislature to prevent all fishing, boating, etc. I DO NOT support this. I support healthy dialog that will result in healthy fish stocks.

Dean Ferguson  
37733 Highway 30  
Astoria, OR 97103  
503-325-8474

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Jennifer Foster <jafix@yahoo.com>

**Date:** Wed, 13 Apr 2005 11:55:04 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,

It's like clear-cutting on the ocean floor. If this was happening to the giant redwoods in California there would be hell to pay.

Jennifer Foster  
6633 Glenwood Rd.

Omaha, NE 68132

**Subject:** Comment on Pacific coast groundfish EFH DEIS

**From:** "Valerie Franck" <[vfranck@hpu.edu](mailto:vfranck@hpu.edu)>

**Date:** Tue, 12 Apr 2005 02:12:01 -0400

**To:** "GroundfishEFHDEIS.nwr@noaa.gov" <[GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)>

April 12, 2005

D. Robert Lohn  
NOAA Fisheries Regional Administrator  
7600 Sand Point Way NE  
BIN C15700, Bldg. 1  
Seattle, WA 98115-0070

Dear Administrator Lohn,

I obtained my PhD in marine science from the University of California Santa Barbara and am now an Assistant Professor of Biology and Marine Biology at Hawaii Pacific University.

As a marine biologist and former California resident, I am deeply concerned with the harmful effect of bottom drawing on California's deep-ocean ecosystems, including deep-water corals. Overfishing in general is an alarming cause for concern, but coupled with the complete habitat destruction that results from bottom trawling methods it is perhaps the single worst environmental atrocity occurring in the ocean today.

Please help protect East Pacific deep-water ecosystems as well as groundfish fisheries. How can we have sustainable groundfish fisheries without groundfish habitat?! Please encourage fishermen to develop more ecologically-sound methods of fishing by reducing bottomfish quotas and phasing out current methods of bottom trawling. Quotas and better fishing techniques has helped sustain Alaska's salmon fishery and can help sustain California's groundfish fisheries as well.

Sincerely,

Valerie Franck  
Hawaii Pacific University  
45-045 Kamehameha Hwy  
Kaneohe, HI 96744  
USA  
[vfranck@hpu.edu](mailto:vfranck@hpu.edu)

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS  
**From:** shelly hansen <graphicsshelly@yahoo.com>  
**Date:** Wed, 13 Apr 2005 14:35:36 -0500 (CDT)  
**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,  
don't kill the oceans or blame others for what you didn't do to protect them.  
shelly hansen  
230 Rice Creek Blvd

fridley, MN 55432

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** jeffrey hastings <beed8@cox.net>

**Date:** Wed, 11 May 2005 15:39:32 -0500

**To:** GroundfishEFHDEIS.nwr@noaa.gov

May 11, 2005

Regional Administrator D. Robert Lohn  
7600 Sand Point Way NE  
Seattle, WA 98115-0070

Dear Regional Administrator Lohn,

this is where all life leads. its strange that the ocean and our  
bodies have the same percentage of salt and water. kill the ocean and  
the species on earth will follow.  
lets get serious.

Sincerely,

Mr. jeffrey hastings  
3582 Colonial Ave  
Los Angeles, CA 90066-2709

**Subject:** Fishing Stocks

**From:** LJHilton1@aol.com

**Date:** Wed, 11 May 2005 11:21:28 EDT

**To:** GroundfishEFHDEIS.nwr@noaa.gov

Please protect our fish stock. If you don't your children are going to want to know why you were so selfish and left them so little.

Larry Hilton

**Subject:** Pacific Fisheries Management Council

**From:** jholland@mcn.org

**Date:** Mon, 9 May 2005 12:39:37 -0700

**To:** GroundfishEFHDEIS.nwr@noaa.gov

**CC:** <rcozens@pon.net>

Mr. D. Robert Lohn, NOAA Fisheries Regional Administrator  
National Marine Fisheries Service, Northwest Region  
7600 Sand Point Way NE, BIN C15700  
Seattle, WA 98115-007

Dear Mr. Lohn,

I am writing to express my support for the effort to identify, restore, and protect ocean habitats that are essential to Pacific Coast groundfish.

Groundfish share a vulnerability to overfishing with open water, schooling fish. But because many groundfish species live in and around the same rocky reefs and other bottom features for most of their adult life, they are also vulnerable to destruction of their homes, feeding areas, and breeding grounds from certain kinds of fishing activity.

I support efforts to identify and protect habitat areas of concern essential to groundfish, and I favor efforts to protect some areas from further damage by prohibiting the use of fishing gear known to damage groundfish habitat. I believe that the elimination of habitat-damaging fishing gear should be done in such a way as to minimize economic hardships on fishermen, as they are simply applying techniques and tools created before mankind realized their potential for damage.

Lastly, I would caution that precautionary management principles be used in all cases where information needed for decision making is unavailable. The history of U.S. and Canadian management of North Atlantic fishing grounds contains instance after instance where socioeconomic interest prevailed over precautionary management principles. Using precautionary management principles when protecting groundfish habitat will help ensure that Pacific groundfish escape the fate of North Atlantic cod.

Sincerely,

John Holland  
Virginia Yager  
P.O. Box 68  
Annapolis, CA 95412

**Subject:** Groundfish impact statement

**From:** "josestone" <josestone@actionnet.net>

**Date:** Wed, 27 Apr 2005 13:39:08 -0700

**To:** GroundfishEFHDEIS.nwr@noaa.gov

Dear Sirs;

I am writing this letter because, again, I find governing fishing bodies possibly considering some very disturbing fishing changes.

First, I would explain some of my background of my fishing expertise. I started fishing at the age of 13 and am now 61 & still fishing. I started in the troll fisher, as most fishermen did at that time, & then moved into bottom trawling where in 1962 I was running bottom trawlers at the age of 20. I have seen the Russians and the Polish take "ocean run" on our grounds. I survived hook changes, mesh size changes, season changes, mercury scares, Demoic acid & Listeria. Fish too white, fish too black, fish too old, fish too young & through all of this I have tried to apply common sense. It is too bad you can't teach common sense because it would be more valuable than today's gasoline.

I understand that as biologists and council members you are being forced down this path by litigation. I am convinced that no matter how we proceed the environmental groups will not be placated and as I look at some these alternatives I cannot see the logic behind them.

Under alternative 6.9, option 9.2 would eliminate the pink shrimp fishery. We have spent 20 changing & fine tuning this particular door arrangement. I actually believe that this door with its 8" wide shoe probably rides lighter on the bottom than the cambered designed doors the option prefers. I have some doubt that we are doing damage to the bottom when we will sometimes fish the same grounds for months with good catch rates.

Option 9.5 would completely curtail my scallop fishing.

Optiom 9.8 would raise havoc with the troll fishery. Troll fishermen fish from the top to the bottom of the water column, and to eliminate the bottom would devastate that fishery.

The reason I have written about these options is because they were the PMFC preferred alternatives.

We have experienced some huge changes in the last few years. We have seen the bottom fish fleet reduced & their area reduced drastically. No fishing from 50-250 fathoms which has, as I see it, solved the problem of bottom contact. This is a tremendous area that is closed with no fishing. As far as I am concerned, is a reserve.

The pink shrimp fleet has implemented sorting grates that eliminate the groundfish catch. The halibut fleet has been moved from inshore to outside of 100 fathoms, another example of our effort to help the council solve these problems.

I think it is time for the industry, the council and the environmentalists to stop making rules that will harm the fishing community. The council has repeatedly said that Rock fish recovery is a slow process so I think we need to give these latest changes (bottom fish 50-250 fathoms, halibut outside of 100 fathoms, shrimp boats with sorting grates) a chance to work. This is why I would endorse the status quo option at this time. It makes the most common sense, something that we all could use a healthy dose of now.

Thank you for considering this letter.

Joseph Rock

**Subject:** EIS

**From:** "Kiech, James" <jkiech@Exchange.FULLERTON.EDU>

**Date:** Thu, 7 Apr 2005 10:05:17 -0700

**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

As a California sport fisherman and an officer of a large, 22 year old, sportfishing club, I want to personally thank you for your efforts to preserve our local fisheries. I appreciate your e-mail updates of information related to your efforts. My only suggestion at this time is that you try to set your open fishing dates for bottom fish a little more in tune with the sport fisherman's season. Typically we fish for surface species from June through October and would like to fish for bottom dwellers during the winter months. Closing the bottom fishing in the warm months would not impact the industry nearly as bad as closing it in the cold months. The sportfishing landings are suffering, trying to find anything to fish for during the winter months with the closures to bottom fishing. Please consider my comments and try to schedule closure times that will not negatively effect the sportfishing industry.

Thanks Jim Kiech

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Jon Koppenhoefer <jonkopp@glasscity.net>

**Date:** Thu, 28 Apr 2005 01:04:56 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,

Having just seen a segment in the National Geographic series "Strange Days on Planet Earth" I am aware of the importance of saving the coral reef as a way to protect the ocean as a habitat and a source of food for human beings.

Creatures that feed on the coral algae in turn supply larger sea life with their nutrition, and these larger creatures (groupers, 'snappers', and the like) are valuable sources of food and commercial income for humans.

Protecting the coral reefs in the Pacific not only is good ecology, it's good economics.

Thanks for considering this in your future decisions.

Jon Koppenhoefer  
264 Oakridge Drive

Springfield, OH 45504

**Subject:** Ground fishery DEIS--Comments 2005

**From:** Gary Lane <gmlane@juno.com>

**Date:** Tue, 10 May 2005 11:42:32 -0700

**To:** GroundfishEFHDEIS.nwr@noaa.gov

**CC:** smurray@audubonportland.org

Mr. D. Robert Lohn, Regional Administrator  
National Marine Fisheries Service

Dear Mr. Lohn:

I am writing to express my concern that Pacific Coast fish habitats be protected from fishing practices that are unnecessarily destructive of marine bottom life and sensitive species such as corals, sponges and kelps. As you should know a diverse ecosystem must be maintained to insure a sustainable population of food fish. Thus, any management plan adopted should insure survival of representative habitat types and should protect the overall long term health of the marine environment. To accomplish this goal, a network of marine reserves should be established as benchmarks against which fishing impacts can be measured. Where insufficient information exists to make a decision impacting the marine environment, the principle of "precautionary management" should be applied. Also, fisherman should be required to adopt fishing methods and equipment that are the least destructive. Fishing equipment must be labeled in an indelible manner so that discarded equipment that poses a hazard to marine life can be traced to the individuals discarding the equipment. Appropriate enforcement action should then be taken against such hazardous dumping.

Thank you for considering my comments on these important fishery issues.

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Lynne Mahlstedt-Burley <LynneMsc@aol.com>

**Date:** Thu, 28 Apr 2005 02:36:40 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,  
The issue seems to be very clear to me.

In St. Lucias it has been proven that when the coral is damaged it becomes chocked with algae which in turn drives the fish away, most especially LARGE.

In Jamaica they can only obtain very small fish. Their coral is seriously damaged.

In order to have large fish we must protect the coral. One is dependent on the other.

In St Lucias where they have set up sanctuaries where no fishing is allowed. As the coral has recoverd, the large fish and predators have returned.

How much must we loose? The worlds leading authorities on the matter state that ninety percent of the worlds large fish are gone. This has happened in two generations.

Sir, respectfully, it is a no brainer. We must protect what we have. If we do not, we will perish.

Lynne Mahlstedt-Burley  
726 Railroad Avenue

Cayce, SC 29033

**Subject:** Comment on 2005 Pacific Coast GroundfishDEIS

**From:** Slabhunter@aol.com

**Date:** Tue, 3 May 2005 13:27:11 EDT

**To:** GroundfishEFHDEIS.nwr@noaa.gov

**CC:** pfmc.comments@noaa.gov

Hello there,

I'm concerned about the perception that the trawl data is being used across the spectrum. Sport and charter fishers are much more selective due to the terminal gear used.

This "reality" is just like saying sportfishing impacts (we release unmarked fish without removing them from the water) are the same as the impacts of gillnets in the mainstem Columbia River.

I'm a volunteer with the Angler Education Program offered by WDFW. Impacts are minimized when people are taught the proper techniques.

I believe this fact and the (positive) economic factors in rural communities should be given priority.

Regards,

Hans M. Mak

Shelton WA 98584

**Subject:** Re: Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** michelle millwee <bonzaibaby64@yahoo.com>

**Date:** Wed, 27 Apr 2005 10:57:16 -0700 (PDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov

To Whom It May Concern: Please not only receive, but consider that with every form of life that we compromise, destroy, and cause extinction for, we move one step closer to doing so to ourselves. Every form of life has a purpose. It has an important part to play in the delicate balance of our planets' ecosystem..Please choose to do what is right....for the overall good of marinelife, and the bigger picture of mankind's future survival. Thank you! Michelle Millwee

--- [GroundfishEFHDEIS.nwr@noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov) wrote:

Your comments have been received by NOAA Fisheries regarding the Pacific Coast Groundfish FMP Essential Fish Habitat Draft EIS. Thank you for your response.

---

Do You Yahoo!?

Tired of spam? Yahoo! Mail has the best spam protection around  
<http://mail.yahoo.com>

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS  
**From:** Angelina Odievich <angeltd@hotmail.com>  
**Date:** Wed, 27 Apr 2005 12:46:56 -0500 (CDT)  
**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,  
Don't allow our oceans to be screwed up by our lack of understanding or consideration to it's ecosystem.

I urge you to act with the future in mind, the lives of not just the ocean but us humans too, we sure get a lot from the ocean...please protect it.

Angelina Odievich  
705 27th Ave.

Seattle, WA 98122

**Subject:** Re: "Comments 2005 Groudfish DEIS"  
**From:** "Jeff Ouderkirk" <jeffo@mail.ouderkirkhollen.com>  
**Date:** Tue, 10 May 2005 12:33:03 -0400  
**To:** <GroundfishEFHDEIS.nwr@noaa.gov>  
**CC:** <pfmc.comments@noaa.gov>

Dear Sir:

I am writing to urge you to insure that the rules and regulations which apply to this important topic include the following:

Increase protection for sensitive habitat types such as kelp, corals, and sponges that are essential to groundfish productivity.

Protect a representative sample of unique habitat types from all types of fishing impacts,

Make it easier for fishermen to change to less destructive gear,

Establish a network of reference reserves in order to better understand fishery impacts on all habitat types,

Develop an ecosystem-based management plan that truly protects the long-term health of the marine environment.

Apply "precautionary management principles" in all cases where information needed for decision making is unavailable.

Jeff Ouderkirk  
Ouderkirk & Hollen  
P.O. Box 1167  
Newport, Oregon 97365  
[www.ouderkirkhollen.com](http://www.ouderkirkhollen.com)  
541-574-1630 office  
541-574-1638 fax

---

Sent via the WebMail system at mail.ouderkirkhollen.com

---

Sent via the WebMail system at mail.ouderkirkhollen.com

**Subject:** Ground fish

**From:** "R.J. Perrone" <skrtmstr@pacific.net>

**Date:** Fri, 8 Apr 2005 23:05:53 -0700

**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

Mr.D.Robert Lohn; and interested agencies:

I am replying to the request for comments on ground fish management, so far all the agencies are trying to do a good job but they are missing a few points that should be viewed. In the North central district we are limited to 120' during the season.

The most pressure on the fish is from the party boat operators.

The 120' depth is a large part of the spawning and rookeries for nearshore fishes, if you restrict the party boat operator from the area and let them fish 120' to 250' there is no way the private boaters could make a impact in the nearshore fishes as they cannot fish because of distance, weather and ocean conditions but for a limited part of the season this would save most of this recourse.

As for Lingcod, again many restrictions and rules have been tried at one point even the fish were confused. if there were a slot limit 24" to 30" on lingcod, because of their survival rate after being released the spawn rate would increase dramatically, slot limits work, look at the sturgeon for example

I have been fishing for more than 50 years and would like to see future generations enjoy the same as I have so listen to some us old fishermen as we have seen the problems and I tried telling them 25 years ago to manage the fishery better.

Thanks for listening:

R.J.(Dick) Perrone

**Subject:** Ground fish

**From:** "R.J. Perrone" <skrtmstr@pacific.net>

**Date:** Fri, 8 Apr 2005 23:05:53 -0700

**To:** <GroundfishEFHDEIS.nwr@noaa.gov>

Mr.D.Robert Lohn; and interested agencies:

I am replying to the request for comments on ground fish management, so far all the agencies are trying to do a good job but they are missing a few points that should be viewed. In the North central district we are limited to 120' during the season.

The most pressure on the fish is from the party boat operators.

The 120' depth is a large part of the spawning and rookeries for nearshore fishes, if you restrict the party boat operator from the area and let them fish 120' to 250' there is no way the private boaters could make a impact in the nearshore fishes as they cannot fish because of distance,weather and ocean conditions but for a limited part of the season this would save most of this recourse.

As for Lingcod, again many restrictions and rules have been tried at one point even the fish were confused. if there were a slot limit 24" to 30" on lingcod, because of their survival rate after being released the spawn rate would increase dramatically, slot limits work, look at the sturgeon for example

I have been fishing for more than 50 years and would like to see future generations enjoy the same as I have so listen to some us old fishermen as we have seen the problems and I tried telling them 25 years ago to manage the fishery better.

Thanks for listening:

R.J.(Dick) Perrone

**Subject:** RE: clean oceans

**From:** ibtpepvr@[aol.com](mailto:ibtpepvr@aol.com)

**Date:** Tue, 05 Apr 2005 10:07:43 -0400

**To:** GroundfishEFHDEIS.nwr@[noaa.gov](mailto:GroundfishEFHDEIS.nwr@noaa.gov)

keep our oceans clean

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** "S. Lee Stone" <leeprairie@austin.rr.com>

**Date:** Thu, 5 May 2005 23:38:32 -0500

**To:** GroundfishEFHDEIS.nwr@noaa.gov

May 5, 2005

Regional Administrator D. Robert Lohn  
7600 Sand Point Way NE  
Seattle, WA 98115-0070

Dear Regional Administrator Lohn,

I would like to see aggressive protection of fragile ocean habitats from bad fishing practices. For now my attention is given especially to our west coast ocean habitats which are so impacted by the hated bottom trawling method. Coral and sponges need protection, as do many non-commercial fish species.

Thank you.

Sincerely,

Ms. S. Lee Stone  
494 SH 71 W STE 140-318  
Bastrop, TX 78602

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** Sherri Tucker <angez\_sher\_lee@yahoo.com>

**Date:** Thu, 21 Apr 2005 18:16:58 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,

Humans made a big mistake by living everyday without learning about what goes on and how to correct what we do wrong with our world in a everyday issue, now we see our trees crumbling from disease and we just sit and over look it, I say we better open our eyes to all of it, because together without all of it working together serves a great purpose for us to Thrive we all need each other to make a perfect life!

Thank you Sherri Tucker

Sherri Tucker

5607 208th St Ct East

Spanaway, WA 98387

**Subject:** Comment on 2005 Pacific Coast Groundfish EFH DEIS

**From:** lucy vega <lucyvega@newlywedsfoods.com>

**Date:** Wed, 13 Apr 2005 13:53:46 -0500 (CDT)

**To:** GroundfishEFHDEIS.nwr@noaa.gov, nepa.comments@noaa.gov

Dear Administrator Lohn,

I agree that It is very important that we keep the corals sponges and other seafloor animals alive. They are important to have in the ocean for the fish.

lucy vega

1962 w. fargo

# 2

chicago, IL 60626

**Subject:** Sport Bottom Fishing

**From:** <rcwenger@adelphia.net>

**Date:** Wed, 4 May 2005 10:48:18 -0400

**To:** GroundfishEFHDEIS.nwr@noaa.gov

**CC:** pfmc.comments@noaa.gov, Hal.Weeks@state.or.us

To Whom it May concern;

Please do not close bottom fishing to sport fisherman off the coast of Oregon. Areas listed as "Areas of Interest" and "Ecologically Important Areas". are important recreation areas for sport fishing, and there is no data that sport fishing has any negative impact. It is my understanding that so far decisions are based on Trawl Data only. This should not be the basis for restricting sport fishing. There are not huge numbers of sport fisherman, but the numbers represent a much bigger number of visitors to the coast of Oregon to do other activities. If the fishing is restricted unnecessarily, it will have a large negative impact on the economies of the coastal towns that are already in poor economic condition.

Please use sport fishing data, and Fishery based data to make such critical decisions on future sport fishing. This should be based on biological justification for an Area to be designated as Important or Critical, not opinion or data based on activities such as trawling when sport fishing is concerned.

Thank you for your consideration.

Dick & Carolyn Wenger  
249 West Saint James Pl  
Longview, Washington  
360-577-5991