



Pacific Fishery Management Council

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February 13, 2007

Mr. Joseph Uravitch
National MPA Center, N/ORM
National Oceanic and Atmospheric Administration
1505 East-West Highway
Silver Spring, MD 20910

Re: Pacific Fishery Management Council Comments on the Draft Framework for Developing the National System of Marine Protected Areas.

Dear Mr. Uravitch:

Thank you for the opportunity to review and comment on the National Marine Protected Areas Center's Draft Framework for Developing the National System of Marine Protected Areas. Your letter and Draft Framework were provided to the Pacific Fishery Management Council (Pacific Council) at its November 2006 meeting in Del Mar, California. Due to the heavy workload associated with the November 2006 meeting, placing this matter on the agenda for the Council and its advisory bodies was not possible. However, on behalf of the Council, I would like to take this opportunity to provide the following general comments on the Draft Framework.

As you are aware the Pacific Council and the National Marine Fisheries Service (NMFS) has implemented several area management concepts including coastwide Rockfish Conservation Areas closed to commercial and recreational fisheries for the protection of overfished groundfish species and areas closed to trawl or bottom contacting fishing gear to protect groundfish essential fish habitat. In developing the later, the Pacific Council worked closely with the National Marine Sanctuary Program to meet shared goals and objectives to protect habitat areas within the Channel Islands, Cordell Bank, and Monterey Bay National Marine Sanctuaries. Many, if not all of these area management actions meet the proposed criteria for marine protected areas (MPAs) in the Draft Framework and should be considered during Phase I efforts to build the initial network or existing MPAs. The Pacific Council is encouraged by this effort to inventory MPAs and marine managed areas and is optimistic that this comprehensive assessment will prove useful to the Pacific Council and the Nation as ecosystem-based fishery management and place-based area management concepts are further investigated.

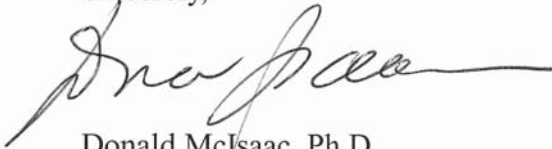
The Pacific Council is in the initial stages of exploring ecosystem-based fishery management principles and is considering the development of a Fishery Ecosystem Plan, in part, to help coordinate, monitor, and assess the effectiveness of area and place-based management efforts. The goals and objectives of the proposed Fishery Ecosystem Plan will likely share attributes of the rational, goals, and objectives of the National System of MPAs. The Pacific Council would welcome collaboration with the MPA Center to ensure the goals and objectives of national and

regional area management plans are based on the best available science and achieve healthy marine ecosystems and sustainable fisheries.

As development of a National MPA Network begins to identify potential gaps and additional conservation needs under Phase 2 of the Draft Framework, it will essential to maintain coordination between the National MPA Center and the Regional Fishery Management Councils, particularly in the early stages of considering new MPAs, if necessary. Should new MPAs or existing MPA's in West Coast National Marine Sanctuaries be deemed to require additional fishery restrictions, the Pacific Council maintains the position that regulation of marine fisheries should occur solely under the authority of the Magnuson-Stevens Fishery Conservation and Management Act via the Pacific Council forum and the regulatory authority of NMFS and the States.

The Pacific Council and I, look forward to continued work with the National MPA Center on the National System of Marine Protected Areas. If you or your staff should have any questions regarding this letter, please contact me or Mr. Mike Burner, the lead Staff Officer on this matter at 503-820-2280.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donald McIsaac', with a long horizontal flourish extending to the right.

Donald McIsaac, Ph.D.
Executive Director

MDB:rdd

c: Council Members
Dr. Charles Wahle