



Pacific Fishery Management Council

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Dorothy M. Lowman, Chair | Donald O. McIsaac, Executive Director

October 3, 2014

President Barack Obama
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. President:

The Pacific Fishery Management Council (Pacific Council) would like to comment on your Executive Action to expand the Pacific Remote Islands Marine National Monument. As you know, the Pacific Council manages commercial, recreational and tribal fisheries in Federal waters off Washington, Oregon and California. The Pacific Council meets only five times per year, and was not able to comment during the brief public comment period leading up to this action. Given our understanding that the monument expansion was recently officially enacted, we offer comments on the process of declaring marine national monuments in general.

In particular, the Pacific Council would like to emphasize the importance of transparency and coordination with Regional Fishery Management Councils (RFMCs) when designating national monuments, as well as the need to consider the wide range of benefits derived from the natural resources being protected prior to final decision making. The fisheries management process laid out under the Magnuson-Stevens Fisheries Conservation and Management Act (MSA) is an inclusive, bottom-up process that involves public input from the earliest stages of a decision. Our decisions are made in a public, transparent forum where the voices of the public, fishermen, environmental organizations, tribes, states, and Federal agencies are taken into account. The MSA is currently due for reauthorization, and the public has repeatedly noted to Congress that the Act works and should not be fundamentally altered. Indeed, among the vast majority of fisheries stakeholders, the current MSA is considered a success—and its requirements for transparency and public involvement are one of the primary reasons for this success.


The MSA has been successful in terms of ending overfishing, rebuilding overfished stocks, and reducing bycatch. It is a law with a strong track record of achieving these kinds of conservation goals, and should be used whenever decisions that affect fisheries are made. Specifically, the RFMCs that were assigned by Congress to guide the management of fisheries in the United States should be consulted early and often in the process of making fisheries decisions, including designating closed areas.

The importance of the Pacific Remote Islands Marine National Monument to U.S. fisheries has been clearly described by the Western Pacific Fishery Management Council in its correspondence with you. The Pacific Council is capable of getting into all the specific issues

involved in this particular monument expansion. However, we are aware that the U.S. tuna fleet that uses the area is the best-managed tuna fleet in the world, and impacts only a small fraction of the region's tuna resource. At times, however, this fleet may be entirely closed off from the resource as a result of the monument designation. In considering such an area closure, we believe it is important that all benefits—economic, ecological, aesthetic—must be carefully weighed in a transparent, public process prior to making any final decision.

In the event that you might begin consideration of establishing marine monuments in areas off the West Coast, we ask that we be provided notice, so as to offer ideas on the best process to use in evaluating serious proposals.

Sincerely,



D. O. Melsaac, Ph.D.
Executive Director

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cc: Pacific Council Members
RFMC Executive Directors
Pacific Council Staff