



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Silver Spring, Maryland 20910

AUG 21 2000

Mr. Donald O. McIsaac
Executive Director
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

RECEIVED

AUG 23 2000

PFMC

Dear Mr. McIsaac:

Thank you for the opportunity to provide comments on the recommendations of the Ad-Hoc Marine Reserve Committee. The comments contained in this letter reflect the collective view of the National Marine Sanctuaries located on the Pacific Coast (please see enclosed map).

We agree with all the recommendations made by the Committee as summarized in the reviewer letter dated August 7, 2000, and strongly urge the Pacific Fishery Management Council (PFMC) to initiate Phase II to consider options for the design and location of marine reserves. We believe that marine reserves will help address both the long-term decline of the groundfish fishery that continues under existing traditional fishery management methods, and the concerns about the limited knowledge we currently have of the impacts of fishing gear on benthic habitats and communities (e.g., by serving as control or reference sites). In order to best address these concerns, reserves must be sited through a science-based process. We also urge PFMC to consider marine reserves in conjunction with other fishery management tools, such as capacity reduction, allocation issues, and harvest policies.

We also strongly endorse the use of the precautionary principle. As section 4.2.5 of the technical analysis concludes, "...while there is substantial uncertainty about the effects of marine reserves it is arguable there is similar or even greater



uncertainty about the effects of conventional harvest management for assessed stocks, not to mention the numerous stocks for which there are no stock assessments." Application of the precautionary principle now may prevent the need for more stringent and costly groundfish conservation efforts through the Endangered Species Act, or similar species conservation statutes.

We heartily advocate the Council working with other jurisdictions in order to identify and designate the most effective marine reserves. As noted in Attachment I, the Council's authority may be limited to those species for which Fishery Management Plans have been developed. Working with partners such as National Marine Sanctuaries would provide the Council the opportunity to participate in processes that could address a broader array of species and activities and provide stronger, more effective protection. Sanctuaries not only share a similar, though broader, mandate with the PFMC, but could provide assistance with information gathering, reserve siting, education, research, monitoring, and enforcement. Some Sanctuaries, including the Channel Islands and Olympic Coast, are already actively considering marine reserves. The Channel Islands Sanctuary, for example, has created several working groups under their Sanctuary Advisory Council that have been meeting for about eighteen months to determine if and where marine reserves should be located in the Sanctuary. Similarly, the Olympic Coast Sanctuary has established a Marine Conservation Working Group of their Sanctuary Advisory Council that has been meeting for six months to evaluate the need for and provide recommendations on potential siting alternatives for marine reserves in the intertidal zone of the Sanctuary. We expect that as other sites move into their management plan reviews, they too may consider marine reserves to help protect sanctuary resources. We would be pleased to consider PFMC as a partner in these efforts. We would also welcome the opportunity to have more involvement in the PFMC's marine reserve process, either through membership on the Ad Hoc Marine Reserve Committee and/or other means, such as providing expert knowledge, transferring data, or providing technical tools and products.

In light of the President's Executive Order on marine protected areas (MPAs), we believe that it is the optimal time for PFMC to

initiate Phase II. This Executive Order instructs the Department of Commerce to consider the following, among other things, in expanding the protection provided by existing MPAs and establishing new MPAs: "integrated assessments of ecological linkages among MPAs, including ecological reserves in which consumptive uses of resources are prohibited, to provide synergistic benefits" and "a biological assessment of the minimum area where consumptive uses would be prohibited that is necessary to preserve representative habitats in different geographic areas of the marine environment."

Finally, should the Council decide to proceed to Phase II, we recommend that the Council work closely with tribal governments to address treaty rights issues when locating marine reserves.

Once again, we appreciate the opportunity to provide comments on this proposal. Please do not hesitate to contact me or any of the Pacific Coast Sanctuary Managers if we can provide assistance with this endeavor.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Basta", with a stylized flourish underneath.

Daniel J. Basta
Acting Chief
National Marine Sanctuary Program

Enclosure

cc: Carol Bernthal, OCNMS
Bill Douros, MBNMS
Jim McCallum, NMFS
Matt Pickett, CINMS
Ed Ueber, GFNMS

West Coast National Marine Sanctuaries

