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PFMC

August 21, 2000

PORT
BROOKINGS
HARBOR

Mr. Don McIsaac, Executive Director
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, OR 97201

Re: Marine Reserves

Dear Mr. McIsaac:

The Port of Brookings Harbor would like to state, for the record, our strong opposition to the proposal for Marine Reserves within the Klamath Management Zone. From our perspective, there is concern that if all other fisheries management issues were addressed there would be no need for a preservation area. Issues like habitat degradation, accurate stock assessments and understanding ocean productivity must and should be addressed before Marine Reserves can be justified or even considered.

If deliberation continues on Marine Reserves there must be ample opportunity for public input and no preconceived ideas. The Port is concerned that unless there is active stakeholder participation, there will be maneuvering of the public into accepting predetermined management policies. For this reason, we respectfully request a seat at the table on this issue. Our representative would be Mr. Jim Welter, a member of the Salmon Advisory Subpanel and Oregon South Coast Fishermen. As you know, Mr. Welter is very knowledgeable about fishery issues and always approaches every issue working toward consensus with all stakeholders.

Thank you in advance for allowing us the opportunity to comment on this most critical of issues to Coastal Communities. If there are any questions, please feel free to contact us at (541) 469-2218.

Sincerely,

Russ Crabtree
Executive Director

c: KMZFC, Crescent City
Port of Brookings Harbor Fisheries Committee
South Coast Fishermen Corporation

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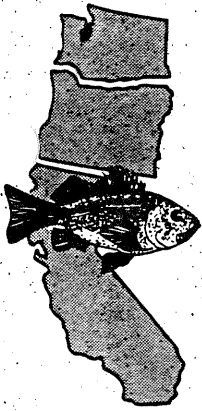
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Pacific Marine Conservation Council

"Dedicated to the health and diversity of our marine life and habitat"

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23 August 2000

Mr. Jim Lone, Chair
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, OR 97201

Comments on September 2000 PFMC agenda item Agenda item B. I. : Marine Reserves Phase I Considerations Report.

Chairman Lone and Council Members,

The Pacific Marine Conservation Council (PMCC), a coalition of commercial and sport fishers, marine scientists, and conservationists, respectfully submits these comments on the issue of the role of marine reserves in fishery management.

PMCC has a position on marine reserves that states they can be an important management tool and indicates our interest in participating in the process in a manner which reflects the organization's objectives of sustainable fisheries and the communities which depend on them. Our position also outlines information we feel is necessary to be collected prior to or concurrent with the implementation of marine reserves. This includes:

- establishing clear goals,
- exploring potential mitigation for impacted fishing communities,
- involving stake holders in the process in a meaningful manner,
- developing and implementing an enforcement plan, and
- collecting initial biological baseline information.


PMCC also believes that marine reserves should not be the only management tool employed. Other management tools such as limited entry, setting Total Allowable Catches (TAC's) and time and area closures must be evaluated for their usefulness in addition to designated reserves.

PMCC agrees with the list of objectives identified by the Marine Reserve Committee (MRC) and supports Council action resulting in the recognition that marine reserves can play a role in fisheries management and movement into Phase II of the process. We support this action for the following reasons:

1. This is a time of transition for the groundfish fishery requiring change in the science, management, and industry impacting these stocks. The initial period of fishing-down these stocks is over and appropriate, alternative management schemes should be developed. The facts are that traditional management has not been successful in maintaining healthy groundfish stock levels and a large body of information has been generated supporting the concept of utilizing marine reserves to mitigate for overfishing and the impacts of fishing on habitat.
2. Growing uncertainty in the management of West Coast groundfish places an increasing value on the scientific information that could be acquired from the designation of "no-fishing" areas, as discussed in the report. "These unharvested sites could provide researchers with a valuable means to separate the effects of fishing from those caused by natural changes in the environment. Data from unfished reference sites also could be used to improve estimates of population parameters for harvested species, thereby directly improving management of the fisheries."¹
3. Information exists suggesting that marine reserves "can be most beneficial to depressed species that reach great size or age and have limited movements or sedentary behavior; these attributes apply to many West Coast groundfish species, some of which are overfished."²
4. The current level of information supporting the use of marine reserves as a management tool, and the potential resulting impacts on the fishery, is not significantly different from the level of information required and utilized by the Council in the implementation of other management tools (examples: implementation of the current monthly cumulative trip limit system, current roller-gear size restrictions). "Several modeling studies have suggested that reserves occupying 50% of a species habitat may result in increased yields (Polacheck 1990, DeMartini 1993). However, it has not been demonstrated that a fishery that is regulated to achieve optimum yield can be improved by implementation of marine reserves. It is equally important to note that it has not been demonstrated the regulatory intent of achieving optimum yield has been met through conventional management for any of the West Coast groundfish stocks. **This emphasizes that those information-limitations to successful application of a marine reserve network are not necessarily greater than those information-limitations to conventional management.**"³

In closing, we support the Council moving forward and into Phase II of the marine reserve process. Thank you for the opportunity to comment on this issue.

Sincerely,



Jennifer Bloeser

^{1,2,3} Draft Report, Marine Reserves To Supplement Management Of West Coast Groundfish Resources, Phase I Technical Analysis. Pages 2 and 5.