

SALMON ADVISORY SUBPANEL COMMENTS ON
GROUNDFISH STRATEGIC PLAN IMPLEMENTATION

The Salmon Advisory Subpanel (SAS) is becoming increasingly concerned about the potential implementation of marine reserves on the Pacific Coast, and the effects of those reserves on salmon fisheries. The SAS has consistently testified that the current salmon regulatory process is sufficient, on an annual basis, to manage our diverse salmon resource. We have asked that these protected areas not apply to commercial or recreational salmon fishing.

It is becoming abundantly clear to us that the scientific/environmental community is committed to, and strongly promoting, "no-take" marine reserves, as compared to Marine Protected Areas (MPAs) which allow certain levels and types of fishing activity. No-take means no fishing for anything whatsoever. On page 2 of a letter from the "National Center for Ecological Analysis and Synthesis" (NCEAS) there is a strong definition of marine reserves. They are exclusively no-take areas. This letter was signed by 161 scientists. This leaves no doubt in our minds that what has been adopted by the Council as "one tool in the tool bag" under the Council's strategic plan for managing groundfish is viewed by (significant) others as a coastwide network of large "no-take" areas. That will affect all fisheries, including many that the Council does not presently manage. That should concern us all.

It is our view that:

1. The Council must be the lead agency in the establishment of any type of marine protected area on the Pacific Coast. Over ninety percent of those affected will be fishermen and those living in fishing communities.
2. Marine protected areas should be established only for the protection of specific species, and as an aid to their rebuilding, and should not constrain fisheries that have little or no impact on stocks of concern.
3. Finally, we ask that you continue to include us in the process as you work your way through the Phase 2 consideration of marine reserves.

PFMC
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