

**J. Kevin McCeney**

60 Amador Ave  
Goleta Ca. 93117  
USA  
805-968-6035

Exhibit F.1.d  
Supplemental Public Comment 3  
June 2002

**RECEIVED**

JUN 11 2002

June 07, 2002

**PFMC**

Pacific Fisheries Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, Oregon  
97220-1384

Dear Member's of the Council,

I am writing this letter concerning the CEQA document for the Channel Islands Marine Reserves. I have been a commercial fisherman for 19 years. My wife and I fish together. And commercial fishing is our sole source of income. Over the last decade we have focused our business towards harvesting lobsters and crabs using traps around the Channel Islands.

At this point I have not completely read the CEQA document. However I have spoken to member's of the department of fish and game and reviewed certain parts of the document. It appears that the document does not fully address the congestion that is going to occur when this plan is implemented.

Every time we lose a fishery, it puts more pressure on the fisheries that are left. The gillnet and abalone closures have already put more pressure on the lobster and crab fisheries. Now the department proposes shrinking the area we get to fish by 25%. This is going to push more traps into a smaller area. Catch per trap is going to decrease. Our productivity is going to be lower. In addition, we are going to have to burn more fuel transiting across closed areas.

In sec. 5.3.1 page 5-17 the document discusses congestion. It appears that the department is going to reduce allowable catch proportionate to the area closure. This reduced quota is going to reduce the total value of the fishery. And this will further reduce our gross income.

I believe that the economic loss is flawed because it ignores these two issues. Our total economic loss has been understated. The true economic loss should be calculated as follows:

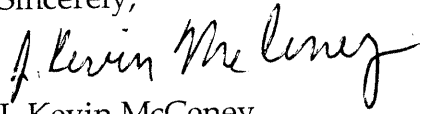
Economic loss = Area loss (Departments calculated loss) + Qouta Loss + Productivity  
Loss

It also appears that the CEQA document does not address mitigation strategies for dealing with the congestion created by the proposed reserves. For instance, maybe a buy out plan or an area permit plan could help mitigate the congestion. Another method might be to permit lobster and crab fishing in some of the proposed reserves in order to lesson the economic impact.

In addition, I've been told that the economic impact of the proposed plan exceeds the allowable economic impact permitted by the Regulatory Flexibility Act. I believe that this issue should also be addressed.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "J. Kevin McCeney". The signature is written in a cursive style with a large, sweeping initial "J" and a long, horizontal flourish at the end.

J. Kevin McCeney

**Subject:** Public Comment - Channel Islands National Marine Sanctuary

**From:** Lloyd Reeves <lloyd@fastkayak.com>

**Date:** Fri, 07 Jun 2002 06:54:50 -0700

**To:** jim.seger@noaa.gov

**Return-Path:** <lloyd@fastkayak.com>

**Received:** from relay-east.nems.noaa.gov ([205.156.4.216]) by mercury.akctr.noaa.gov (Netscape Messaging Server 4.15 mercury Jun 21 2001 23:53:48) with ESMTP id GXC9GZ00.N5U for <Jim.Seger@mercury.akctr.noaa.gov>; Fri, 7 Jun 2002 06:58:11 -0700

**Received:** from nems.noaa.gov (gummo-out.nems.noaa.gov [205.156.4.217]) by relay-east.nems.noaa.gov (Netscape Messaging Server 4.15) with ESMTP id GXC9GY00.17V for <jim.seger@noaa.gov>; Fri, 7 Jun 2002 09:58:10 -0400

**Received:** by nems.noaa.gov; id JAA00753; Fri, 7 Jun 2002 09:58:10 -0400 (EDT)

**Received:** from mx1.fix.net(64.4.129.13) by gummo.nems.noaa.gov via csmmap (V4.1) id srcAAA\_EayDb; Fri, 7 Jun 02 09:58:09 -0400

**Received:** from fastkayak.com (pm5-broad-26.snlo.dialup.fix.net [64.4.130.26]) by othello.fix.net (8.11.6/8.11.6) with ESMTP id g57Dw7Z31567 for <jim.seger@noaa.gov>; Fri, 7 Jun 2002 06:58:07 -0700

**Message-ID:** <3D00BB2A.21B051B8@fastkayak.com>

**X-Mailer:** Mozilla 4.61 (Macintosh; I; PPC)

**X-Accept-Language:** en

**MIME-Version:** 1.0

**Content-Type:** text/plain; charset=us-ascii; x-mac-type="54455854"; x-mac-creator="4D4F5353"

**Content-Transfer-Encoding:** 7bit

Lloyd Reeves wrote:

6//7/02

Public Comment - Channel Islands National Marine Sanctuary

Dear Folks;

This letter is to let you know that I support the Channel Islands National Marine Sanctuary. I feel that Marine Sanctuaries will do more

in the way of enhancing fish stocks than any other management tool.

For

starters it effects every fisherman equally and best of all - unlike some management tools there are no discards! In fact I believe that Marine Sanctuaries are the answer to the current groundfish crisis. I

believe that had we created Marine Sanctuaries every other 20 miles of

coastline and out the full 200 miles instead of limited entry that we would be in a much more healthy place right now.

Please continue your efforts in this direction.

Sincerely,

Lloyd Reeves - owner longline A permit # 0005  
1155 2nd Street  
Los Osos, Ca. 93402

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