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Pacific Fishery Management Council
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Suite 200
Portland, OR 97220

Mr. Steve Copps
National Marine Fisheries Service
7600 Sand Point Way N.E.
Bin C 15700
Seattle, WA 98115

April 7, 2003

Dear Chairman Radke and Mr. Copps:

Oceana appreciates the work and the process the National Marine Fisheries Service (NMFS) and the Pacific Fishery Management Council are undertaking in the development of the Essential Fish Habitat Environmental Impact Statement (EFH EIS). As part of this process, it is critical that all relevant habitat data be brought forward to the public and be directly used to develop alternatives that prevent and mitigate the adverse impacts of fishing on essential fish habitat. This is crucial for the continued viability of our West Coast fisheries.

In the North Pacific region, we have worked extensively with NMFS and the North Pacific Fishery Management Council to develop a management alternative that protects habitat while maintaining vibrant fisheries. A seafloor habitat protection alternative was developed by Oceana and presented by Oceana and The Ocean Conservancy. With support from the fishing community, the North Pacific Fishery Management Council has adopted Oceana's alternative for the Aleutian Islands region for inclusion in their EFH EIS. The Oceana Approach contains the following elements:

- ◆ Compilation and analysis of habitat data and fishing effort data;
- ◆ Allowance of trawling only in specific open areas to maximize protection of EFH while minimizing economic impacts on the fishing industry;
- ◆ Enforcement of bycatch caps on benthic habitat indicators;
- ◆ Initiation of comprehensive research, mapping, and monitoring, including local knowledge; and
- ◆ Expansion and improvement in observer coverage, with the requirements of electronic logbooks and vessel monitoring systems.

Oceana, in collaboration with Mark Powell of The Ocean Conservancy, will develop the same approach as a comprehensive habitat protection alternative for waters off California and the Pacific Northwest to be considered for inclusion in the Pacific EFH EIS. We look forward to working with you to obtain all relevant habitat and fishery information to develop this alternative that will substantially protect essential fish habitat while maintaining vibrant fisheries.

Sincerely,

Jim Ayers
Oceana, Pacific Regional Director