



NATURAL RESOURCES DEFENSE COUNCIL

September 13, 2004

Mr. Don Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220

Dear Mr. Hansen and fellow Council members:

On behalf of the over 1 million members and activists of NRDC (Natural Resources Defense Council), we are writing to encourage the Council to take the direction of the SSC and begin implementing marine reserves¹ to complement existing management measures for west coast groundfish. As discussed in the white paper, marine reserves can offer many benefits when used in combination with effective fisheries management. The Council completed its Phase I technical analysis on marine reserves over four years ago and decided at that time to embark on Phase II, the designation phase. Unfortunately, little progress has been made on Phase II. Now is an opportune time for the Council to take up Phase II in earnest.

The Council is already considering area closures, such as no bottom-fishing zones, to protect essential fish habitat (EFH) through the EFH environmental impact statement. The boundaries of the large rockfish conservation area fluctuate each year. As part of Phase II, the Council should develop marine reserve network designs with the objectives of providing more stable, longer-term protection for vulnerable habitats and meeting bycatch-reduction goals. A network could also help simplify complex regulations. We believe the Council has the opportunity to meet the requirements of the Magnuson-Stevens Act and improve the sustainability of groundfish populations with a well designed marine reserve network.

The SSC has laid the groundwork for the Council to develop marine reserves. Much of the scientific information necessary to design marine reserves for groundfish is already available to the Council through its own documents, scientists, and advisors; in fact, Dr. Richard Parrish has already created a proposal for discussion. We ask the Council to produce a draft proposal by the fall of 2005.

Sincerely,

Kate Wing
Ocean Policy Analyst

Karen Garrison
Co-Director, Ocean Protection Initiative

¹ We are using the definition of marine reserve adopted by the SSC and the Council here: "an area where some or all fishing is prohibited for a lengthy period of time."