

Alliance of Communities for Sustainable Fisheries
P O Box 1309, Carmel Valley, CA 93924 (831) 659-2838

February 17, 2005

RECEIVED

FEB 22 2005

Mr. Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

PFMC

Dear Chairman Hansen and members of the Council:

We are writing to advise you that the fishing community has concerns about the inclusion of the Davidson Seamount into the boundaries of the Monterey Bay National Marine Sanctuary, or any other Sanctuary. We also must advise you that we strongly object to any change in the Designation Document of the MBNMS – or any other – which will make “fishing” an activity subject to further regulation by a Sanctuary. And of course, we oppose granting the authority to the Sanctuary Program to create a specific fishery regulation.

We continue to believe that there are mechanisms available through the Pacific Fishery Management Council to provide reasonable protection to any unique sponges or corals found in this area. We are convinced that the Sanctuary Program has no ability to provide the guarantees that we need into the future that sanctuary status will not be used as a justification to lead to ever-increasing restrictions on fishing, including fishing at or near the surface. We further observe that the problems which we have experienced in the management of the Monterey Bay National Marine Sanctuary, which really stem from a lack of clarity in the Management Plan and the National Marine Sanctuary Act. Must be substantially addressed before the Sanctuary Program could credibly entertain the idea of expanding its territory. Lastly, at some 5300 square miles, the Monterey Bay National Marine Sanctuary is already too large by many measures for thorough management.

If the Sanctuary Program is looking for more to do, may we respectfully suggest that there is significant work to be done on resource abundance assessments, which we hope the Monterey Bay National Marine Sanctuary will do in partnership with the fishing industry. This information could be provided to the fishery management agencies, providing a basis for improved decision-making – a goal we all share.

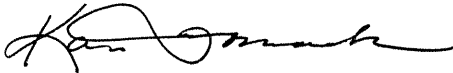
In addition to the Alliance of Communities for Sustainable Fisheries, we want to point out the list of supporting members of our organization. In addition to this general support, **this letter has been specifically endorsed by:**

- Western Fishboat Owners Association
- Ventura County Commercial Fishermen's Association
- Santa Barbara Commercial Fishermen's Association, Inc.
- Port San Luis Commercial Fishermen's Association
- Morro Bay Commercial Fishermen's Association

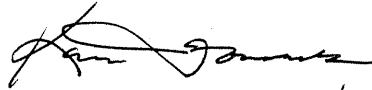
- Monterey Commercial Fishermen's Association
- Fishermen's Association of Moss Landing
- Santa Cruz Commercial Fishermen's Marketing Association
- Half Moon Bay Fishermen's Marketing Association
- Federation of Independent Seafood Harvesters
- The Fishermen's Alliance
- Coastside Fishing Club (recreational)
- Pacific Coast Federation of Fishermen's Associations (PCFFA)
- United Anglers of California, Inc.

Thank you for considering our position on this matter.

Sincerely,



Kathy Fosmark
Co-Chair, ACSF



Frank Emerson
Co-Chair, ACSF

for Frank Emerson

Supporting Associations & Organizations

- Pacific Coast Federation of Fishermen's Association
- Port San Luis Commercial Fishermen's Association
- Morro Bay Commercial Fishermen's Association
- Monterey Commercial Fishermen's Association
- Fishermen's Association of Moss Landing
- Santa Cruz Commercial Fishermen's Marketing Association
- Half Moon Bay Fishermen's Marketing Association
- Fishermen's Alliance
- Western Fishboat Owners Association
- Ventura County Commercial Fishermen's Association
- Federation of Independent Seafood Harvesters
- Golden Gate Fishermen's Association
- Port San Luis Harbor District
- City of Morro Bay Harbor
- City of Monterey Harbor
- Moss Landing Harbor District
- Santa Cruz Port District
- Pillar Pt. Harbor, San Mateo County Harbor District

C: Dan Basta
Bill Douros

Advocates for Wild, Healthy Oceans

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Formerly the Center for
Marine Conservation

March 10, 2005

Chairman Donald Hansen and Members of the
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384



RE: Support for Protection of Cordell Bank

Dear Chairman Hansen and Members of the Pacific Fisheries Management Council:

Please accept the following comments on behalf of The Ocean Conservancy and our more than 500,000 members and volunteers nationwide. The Ocean Conservancy urges the Council to adopt draft designation document comments and sanctuary fishery regulations in support of closing the Cordell Bank to fishing activities that could adversely impact the benthic habitat and invertebrates within the 50-fathom isobaths surrounding Cordell Bank.

As noted in your briefing materials, Cordell Bank is a unique underwater habitat that supports a wide range of species. Located at the edge of the continental shelf, Cordell Bank is a submerged granitic island featuring ridges and pinnacles that reach to within 120 feet of the ocean's surface. Upwellings of nutrient rich ocean waters and Cordell Bank's topography combine to create one of the most biologically productive areas on the West Coast. Both the nature of the Bank's high relief structure and the long-lived and slow growing benthic invertebrate community that inhabits the Bank contribute to the area's vulnerability to damage from bottom tending fishing gear.

Given the ecological importance of Cordell Bank and the fragility of the Bank's habitat and benthic communities, The Ocean Conservancy supports the proposed limitation on fishing above the Bank. We urge the Pacific Fisheries Management Council to work cooperatively with the National Marine Sanctuary Program to insure timely adoption of such regulations.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Kaitilin Gaffney". The signature is written in a cursive, flowing style.

Kaitilin Gaffney
California Central Coast Program Manager