



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

Representing California's Historic Fishery

March 15, 2005

Mr. Don Hansen, Chair
and Members of the Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland, OR 97220-1384

RE: Agenda Items G.1.d and G.2.d – PROPOSED CHANGES TO NATIONAL MARINE SANCTUARY DESIGNATION DOCUMENTS

Dear Mr. Hansen and Council members,

These comments are submitted on behalf of the California Wetfish Producers Association, which represents the major wetfish processors in Monterey and southern California, as well as fishermen from both regions. We appreciate this opportunity to present our views and concerns regarding the proposals by the Channel Islands, Monterey and Cordell Banks National Marine Sanctuaries to amend their designation documents to regulate fishing.

As a member of the Coastal Pelagic Species Advisory Subpanel, I fully supported statements of concern presented earlier to the Council on this issue. I've also read and concur with the advice given to the Council by the Groundfish Advisory Panel in March 2005:

"IN GENERAL – The GAP strongly opposes amendment of Sanctuary designation documents to allow regulation of fishing. While the Sanctuaries have excellent staff, they do not have the specific expertise in fisheries conservation and management, a broad familiarity with the coast-wide fisheries that the Council manages, historical perspective... or a capability to encompass the complexity of fishery management, including the use of expert advisory panels. ... "

CWPA members also concur that the Sanctuaries have neither the scientific expertise nor the public decision-making process to implement fishery management effectively, and by this letter they register their agreement with the advice provided by the CPSAS and the Groundfish Advisory Panel, encouraging the Council to oppose the proposals advanced by the Sanctuaries to amend designation documents to authorize Sanctuary regulation of fisheries in Sanctuary waters.

Re: the Channel Islands - Existing protective authorities granted to NOAA Fisheries under the Magnuson Act have already been or can be applied to address the ecosystem protections outlined in the CINMS Staff Preliminary Working Draft document. There is no need for an additional, duplicative layer of authority to regulate fishing activities beyond the strict regulations already implemented by NOAA Fisheries and the State of California. In fact, considering the budget deficit currently engulfing the federal government, we feel that Sanctuary efforts seeking to duplicate existing fishery management authorities, which would likely entail competition for funding for duplicative programs between the National Ocean Service and NOAA Fisheries, is not an efficient use of taxpayers' dollars.

Re: the boundary expansion proposed by CINMS – In light of modern advances in electronics and GIS technology, we disagree that the Sanctuary needs to modify its boundaries outside the existing Sanctuary to effect "better management".

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Re: the Monterey Bay National Marine Sanctuary proposal to amend its designation document to incorporate the Davidson Seamount and prohibit fishing below 3,000 feet –
Again CWPA members support the public testimony opposing this proposal made by the Alliance of Communities for Sustainable Fisheries and the statement issued by the GAP: "...there are other means using existing authority to provide any necessary protection to Sanctuary resources without either increasing the size of the existing MBNMS by nearly 10 percent or giving fisheries management authority to MBNMS."

Re: Cordell Banks NMS – Again, there is no need to amend the Sanctuary designation document because the protections sought by the Sanctuary may be obtained through the Magnuson Act and existing Council processes.

We encourage the Sanctuaries to focus on their existing conservation mandates through education, research, and improving water quality. While the Sanctuaries should develop a cooperative relationship with the Council, fishery management is best left to the Council, with its scientific expertise, responsibility under the law, and established public processes.

Thank you very much for considering these comments.

Best regards,

Diane Pleschner-Steele
Executive Director

cc: Rod McInnis, SW Region Administrator, NMFS
Mike Burner