

February 27, 2006

D. Robert Lohn
Administrator, Northwest Region
NMFS
7600 Sand Point Way NE
Seattle, Washington 98115

Dear Mr. Lohn:

On behalf of The Nature Conservancy, we would like to provide our comments and observations on a proposed rulemaking by the Department of Commerce published in the Federal Register January 12, 2006. The proposed rule is to implement Amendment 19 to the Pacific Coast Groundfish Fishery Management Plan (FMP).

Amendment 19 provides a comprehensive program to describe, identify and protect essential fish habitat (EFH) for west coast groundfish in California, Oregon and Washington. EFH provisions in the Magnuson-Stevens Act require NOAA Fisheries to minimize, to the extent practicable, adverse effects on EFH from fishing and fishing gears.

The Nature Conservancy strongly supports the adoption and implementation of Amendment 19 and firmly believes that both NOAA Fisheries and the Pacific Fisheries Management Council handled this complex and contentious issue in a professional and balanced manner. Furthermore, it is clear that this Council demonstrated superb leadership by crafting a comprehensive plan that will have a significant impact on conserving and enhancing EFH while allowing for the groundfish fishery to continue to prosper. And, we would be remiss not to acknowledge the hard and innovative work accomplished by the Northwest Regional NOAA staff who worked closely with the Council, fishing community, NGO community and the public to find a workable solution. Examples of this type of bold leadership are exceedingly rare. Consequently, those who care about sustaining our oceans and its productivity for the long term should be pleased and uplifted by this outcome.

One component of Amendment 19 that is particularly impressive is the discrete areas that are closed to fishing with specified gear types. Numerous ecologically important areas will be banned to bottom trawling and some habitats, like seamounts, will be closed to all bottom-contacting gear. Due to this foresight and precautionary management practice, the ecological integrity of large areas of seafloor habitat will be protected not only for the suite of west coast groundfish, but for hundreds or thousands of species of marine

biodiversity that are also supported by these habitats. This action will help set the stage for moving towards ecosystem-based management along the Pacific Coast.

Sincerely,

/s/

Chuck Cook
Marine Program Director
The Nature Conservancy of California

cc: Vice Admiral Conrad C. Lautenbacher
Under Secretary of Commerce for Oceans and Atmosphere

Dr. William T. Hogarth
Assistant Administrator for NOAA Fisheries