



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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Mr. Herb Pollard, Chair
And Members of the Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland OR 97220-1384

RE: Agenda Item G.1 Administrative Matters - Legislative

Dear Mr. Pollard and Council members,

California's fishing community – more than 40 harbors, chambers of commerce, seafood processors and fishing groups, both recreational and commercial – have united to oppose the proposal to declare virtually all offshore seamounts, ridges and banks off the coast of California as monuments under the Antiquities Act, and permanently close these areas to commercial fishing.

The proposal was developed with no outreach to fishery scientists and managers in NOAA, NMFS, or the Pacific Fishery Management Council. Only after fishermen discovered the plan did proponents come out of the closet. The use of the Antiquities Act to designate marine protected areas as monuments in offshore waters is inconsistent with the nation's ocean policies set forth – not only in this Administration's National Ocean Policy Plan - but in a panoply of federal laws, including the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

On behalf of this coalition of fishing interests who have joined with other regions nationwide represented by the National Coalition of Fishing Communities (NCFC), I am sharing the letter we sent to President Obama and his Administration. We greatly appreciate your help to inform the President and Council of Environmental Quality (CEQ) that the Pacific Fishery Management Council strongly supports the resolutions of the Council Coordination Committee, expressly: "...if any designations are made in the marine environment under authorities such as the Antiquities Act of 1906, that fisheries management in the US EEZ waters continue to be developed, analyzed and implemented through the public process of the [MSA]" -- which requires the use of best available, peer-reviewed science and economic analysis conducted in a fully public and transparent process managed by regional fishery management councils.

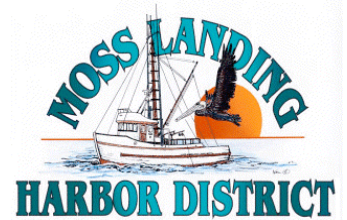
Thank you for your help!
Best regards,

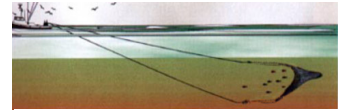
Diane Pleschner-Steele
Executive Director

MR. PRESIDENT, WE OPPOSE THE DESIGNATION OF CALIFORNIA OFFSHORE MONUMENTS THAT PROHIBIT FISHING.

We agree that fishery management in the US EEZ is best implemented under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The MSA has been heralded worldwide for its success in conserving fishery resources.

We oppose the designation of California offshore marine monuments that prohibit fishing under the Antiquities Act because monument status is irreversible, and the Antiquities Act process involves no public peer-reviewed scientific analysis, no NEPA analysis, no public involvement or outreach to parties most impacted — no transparency.

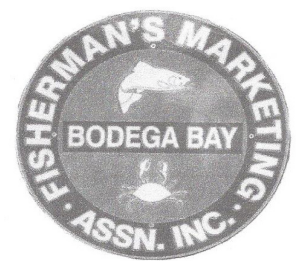




Southern California Trawlers



Monterey Commercial Fishermen's Association



July 6, 2016

The President
The White House
Washington, DC 20500

Dear President Obama:

We are writing to express our opposition to the recent proposal to declare virtually all offshore seamounts, ridges and banks off the coast of California as monuments under the Antiquities Act, and permanently close these areas to commercial fishing. The document “The Case for Protecting California’s Seamounts, Ridges and Banks” was drafted and advanced behind closed doors with no public peer-reviewed scientific analysis, no NEPA analysis, and virtually no public engagement.

We discovered this secret effort after pursuing rumors, and found the justification for this proposed action is filled with sensational, inaccurate statements and omissions. The economic analysis for the proposed closures grossly understates the importance and value of the identified seamounts, ridges and banks to fisheries and fishing communities. Beyond simple ex-vessel value is the opportunity cost of losing these productive fishing grounds forever.

All the seamounts and banks in the proposal are important for fisheries. Fisheries provide healthy food for people, and our fisheries are a well-managed renewable resource. Tanner and Cortes Banks, in southern California, are critically important for many fisheries: tunas, swordfish, rockfish, spiny lobster, sea urchins, white seabass and coastal pelagic species including mackerels, bonito and market squid. In northern California, Gorda and Mendocino Ridges provide important albacore tuna fishing opportunities to portfolio fishermen who, for the past few seasons, have been unable to rely on Chinook salmon and Dungeness crab fisheries. Moreover, these areas are essential for the Commercial Passenger Fishing Vessel (CPFV) fleet, which are licensed commercial fishing boats. Closure of these important areas to commercial fishing would also deny access to the CPFV fleet and would cause disastrous economic impacts to fishermen, seafood processors and allied businesses, fishing communities and the West Coast fishing economy.

California has the most strictly regulated fisheries in the world. Precautionary policies for protecting resources in federal waters exist under the federal Magnuson-Stevens Fishery Conservation and Management Act (MSA), and many other bipartisan laws, such as the Marine Mammal Protection Act and Endangered Species Act, which require science-based analysis conducted in a fully public and transparent process.

In contrast, the Antiquities Act is a unilateral action. This proposal was developed with no outreach to fisheries managers in NOAA, NMFS, the Pacific Fishery Management Council, or fishermen. Further, the use of the Antiquities Act to designate marine protected areas as monuments in open ocean waters is inconsistent with the nation’s ocean policies set forth in the panoply of Federal laws in the US – even this Administration’s own National Ocean Policy Plan, which promises “Robust stakeholder engagement and public participation.” Adopting the proposed monuments using a land-oriented Presidential order goes against the bipartisan legacy of the nation’s ocean environment laws, programs and policies, whose hallmark is transparency, and which have a long track record of working successfully to protect marine resources.

We ask you to stop the creation of these California offshore monuments under the Antiquities Act because monument status is irreversible, and the Antiquities Act process involves no science, no public involvement nor outreach to the parties who will be most affected by this unilateral action – no transparency.

We ask you to inform the White House Council on Environmental Quality as well as the Secretaries of Commerce and Interior that you oppose the creation of these monuments and support the resolution of the Council Coordination Committee, signed by all eight regional Fishery Management Councils, that fishery management in the US EEZ should continue to be implemented under the MSA.

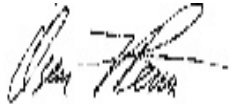
Thank you for your attention.

Respectfully,

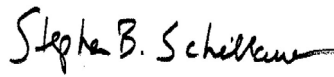
/s/



James M. Haussener
Executive Director
California Marine Affairs &
Navigation Conference



Oscar Peña
General Manager
Ventura Port District



for Michael McCarthy
City Manager
City of Monterey



Linda G. McIntyre, Esq.
General Manager/Harbor Master
Moss Landing Harbor District



Ryan Mullany
President
California Association of Harbor
Masters and Port Captains



Elise Swanson
President / CEO
San Pedro Chamber of
Commerce



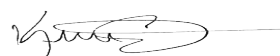
Sharon Bernie-Cloward
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Association



Nancy Lindholm
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Oxnard Chamber of Commerce



Sandy Smith
Board Chair
Ventura County Economic
Development Association



Ken Oplinger, President / CEO
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West Coast Seafood Processors
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Kathy Fosmark, Chair
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Tim Sloane, Executive Director
Pacific Coast Federation
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Rob Ross
Executive Director
California Fisheries & Seafood
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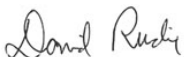
Wayne Heikkila, President
Western Fishboat Owners Associa-
tion



Natalie Webster
Director of Operations
American Albacore Fishing Assn.



Peter Halmay
President
San Diego Fishermen's
Working Group



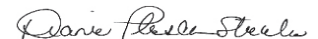
Dave Rudie, President
Catalina Offshore Products



Anthony Vuoso, President
TriMarine Fish Company



Ken Franke, President
Sportfishing Association of
California



Diane Pleschner-Steele
Executive Director
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Tom Trumper
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Pacific Rim Seafood



Don Brockman
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Davey's Locker Sportfishing &
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Mike Thompson
President
Newport Landing Sportfishing



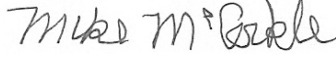
Shad Catarius
President
San Diego Oceans Foundation



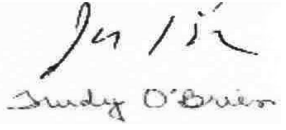
David Goldenberg
Executive Director
California Sea Urchin
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Milo Milkotin
Executive Director
California Sportfishing League



Mike McCorkle
President
Southern CA Trawlers Association



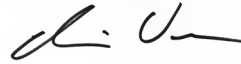
Jeremiah & Trudy O'Brien
Morro Bay Commercial
Fishermen's Association



Mike Conroy, Board of Directors
California Lobster & Trap
Fishermen's Association



Jonathan Gonzalez
President
Ventura County Commercial
Fishermen's Association



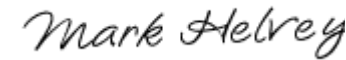
Chris Voss
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Tom Hafer
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Larry Collins
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