



Marine Conservation Alliance

promoting sustainable fisheries to feed the world

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Adak Community Development Corporation

Alaska Bering Sea Crabbers

Alaska Longline Co.

Alaska Whitefish Trawlers Association

Alaska Groundfish Data Bank
International Seafoods of Alaska, North Pacific Seafoods, Trident Seafoods, Western Alaska Fisheries

Alaska Scallop Association

Aleutian Pribilof Island Community Development Association

Akutian, Atka, False Pass, Nelson Lagoon, Nikolski, St. George

Arctic Storm Management Group

Bristol Bay Economic Development Corporation

Aleknagik, Clark's Point, Dillingham, Egegik, Ekuuk, Ekwok, King Salmon, Levelock, Manokotak, Naknek, Pilot Point, Port Heiden, Portage Creek, South Naknek, Togiak, Twin Hills, Ugashik

Central Bering Sea Fishermen's Association

St. Paul

City of Unalaska

Glacier Fish Company

Groundfish Forum

Fishermen's Finest, Iqique US, Ocean Peace, O'Hara Corporation, United States Seafoods

High Seas Catchers

Ocean Harvester, Sea Storm, Neahkahnie

Icicle Seafoods

Norton Sound Economic Development Corporation

Berig Mission, Diomedea, Elm, Gambell, Golovin, Rogyk, Nome, Saint Michael, Savoonga, Shaktoolik, Stebbins, Teller, Unalakleet, Wales, White Mountain

Pacific Seafood

Pacific Seafood Processors Association

Alaska General Seafoods, Alyaska Seafoods, Golden Alaska Seafoods, North Pacific Seafoods, Peter Pan Seafoods, Phoenix Processor Limited Partnership, Trident Seafoods, UniSea, Westward Seafoods

United Catcher Boats

Akutian Catcher Vessel Association

Mothership Fleet Cooperative

Northern Victor Fleet

Peter Pan Fleet Cooperative

Unalaska Co-op

Unisea Fleet Cooperative

Westward Fleet Cooperative

July 30, 2014

Mr. Michael Boots, Acting Chair
Council on Environmental Quality

RE: Proposed Pacific Remote Islands Marine National Monument Expansion

Dear Mr. Boots,

Thank you for considering our letter regarding the expansion of the Pacific Remote Islands Marine National Monument (the monument). The Marine Conservation Alliance is comprised of fishery harvesters, seafood processors, and fishing dependent communities with interests in the Bering Sea, Aleutian Islands, and Gulf of Alaska. Collectively our membership is involved in the majority of seafood harvested from federal waters off the coast of Alaska, generating hundreds of millions of dollars of economic activity and thousands of jobs in Alaska, the Pacific Northwest, and beyond. Our mission is to seek practical, science-based solutions that support sustainable management of fisheries.

We appreciate the Administration's willingness to solicit comments on the proposed expansion of the monument. We firmly believe that good public policy should involve robust public process that is informed by analysis and public comment, and that this process should ultimately result in a decision that is a fair balance of conservation and utilization. It is vitally important that fishery management matters be subjected to robust public process due to the complexities involved with the utilization, conservation, and management of our nation's fisheries resources. Fisheries remain an important economic engine in many of our nation's coastal communities. In addition, fisheries resources hold tremendous cultural and subsistence value in many U.S. coastal areas. Successfully threading the needle between fishery conservation and utilization demands that policy makers understand important nuances of fishery management, including economic and social needs of stakeholders. It is for this reason that we ask the Administration to take a step back from the monument designation process and utilize the existing Fishery Management Council process for achieving conservation goals.

The proposed monument expansion is alarming, both because of the process involved to date and the immense size of the proposed expansion. Apparently little or no public outreach or dialog occurred before the proposal was announced. Furthermore, the proposal was apparently developed in close consultation with the Marine Conservation Institute, an advocacy organization with a track record that shows little interest in the well-being of marine resource users, nor in understanding the importance of robust public process for effective fishery management (see report titled "Expansion of the U.S. Pacific Remote Islands Marine National Monument - The largest ocean legacy on Earth" May 2014). The result is a proposed monument expansion that appears to be justified by several unproven assumptions about fisheries in the area and a lack of

understanding regarding the effect that ongoing fisheries have on the area's ecosystem. For instance, the document authored by the Marine Conservation Institute claims that little to no fishing activity occurs in the proposed monument expansion area, yet it is clear from comments of the Western Pacific Fishery Management Council (WPFMC) that such a conclusion would be erroneous. Why didn't the Administration consult with the WPFMC regarding fishing activity in the area and the impact of those fishing activities on the marine ecosystem?

What is implied by the use of the Antiquities Act to expand the monument is that available public processes would not result in adequate levels of conservation. A review of U.S. fishery management will show that substantial conservation gains have been made by our nation's Fishery Management Councils, especially in recent years. Our Fishery Management Councils continue to advance conservation initiatives where they are necessary. Measures enacted by our Councils have nearly halted overfishing; have resulted in substantial protections for coral and other vulnerable marine ecosystems; and are increasingly invoking broader ecosystem-level protections. For example, The North Pacific Fishery Management Council has developed measures resulting in over 100,000 square nautical miles of habitat conservation in the Bering Sea and Gulf of Alaska. These measures were developed after considering the available science and after considering substantial public input. Measures ultimately developed were tailored in a way that accomplishes conservation objectives while minimizing socioeconomic impacts to resource users.

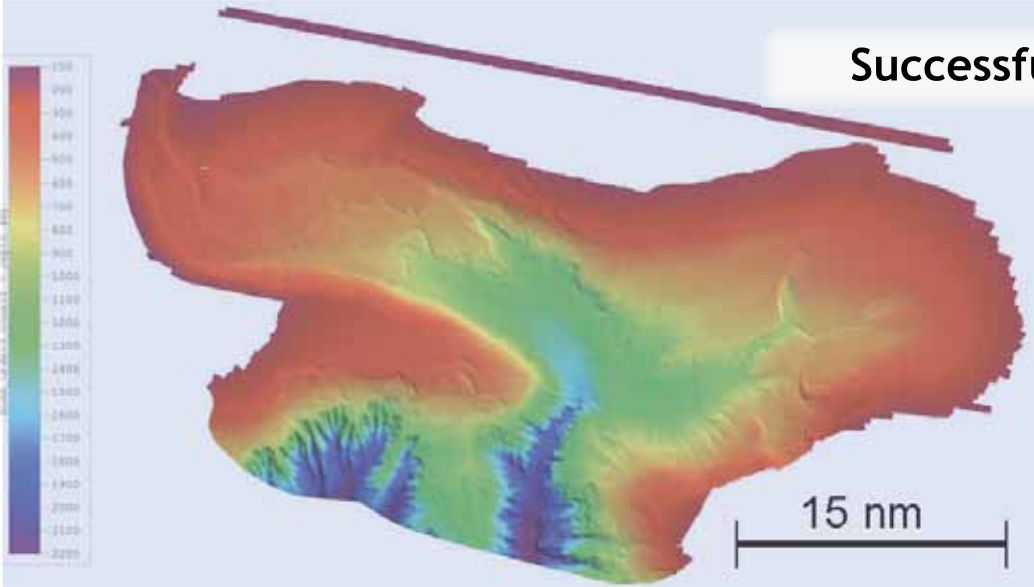
Outcomes such as those in the North Pacific show that available public processes can result in significant degrees of conservation while minimizing socioeconomic impacts to marine resource users. The proposal to expand the Pacific Remote Islands Marine monument cannot claim this same type of robust process.

The membership of the Marine Conservation Alliance appreciates the difficult task involved in balancing conservation and utilization of marine resources; however fisheries management is – by necessity – an extraordinarily complex task with implications that matter a great deal to our domestic fishing industry, subsistence users, coastal communities, support businesses, and long standing traditional and cultural practices. We strongly urge the Administration to use the existing Fishery Management Council process for developing fishery-related conservation measures in the West Pacific and in other regions where appropriate. The Fishery Management Council process has shown that it is adept at developing fishery management measures that appropriately balance conservation and utilization.

Sincerely,

Merrick Burden
Executive Director

Successful North Pacific Fisheries Management



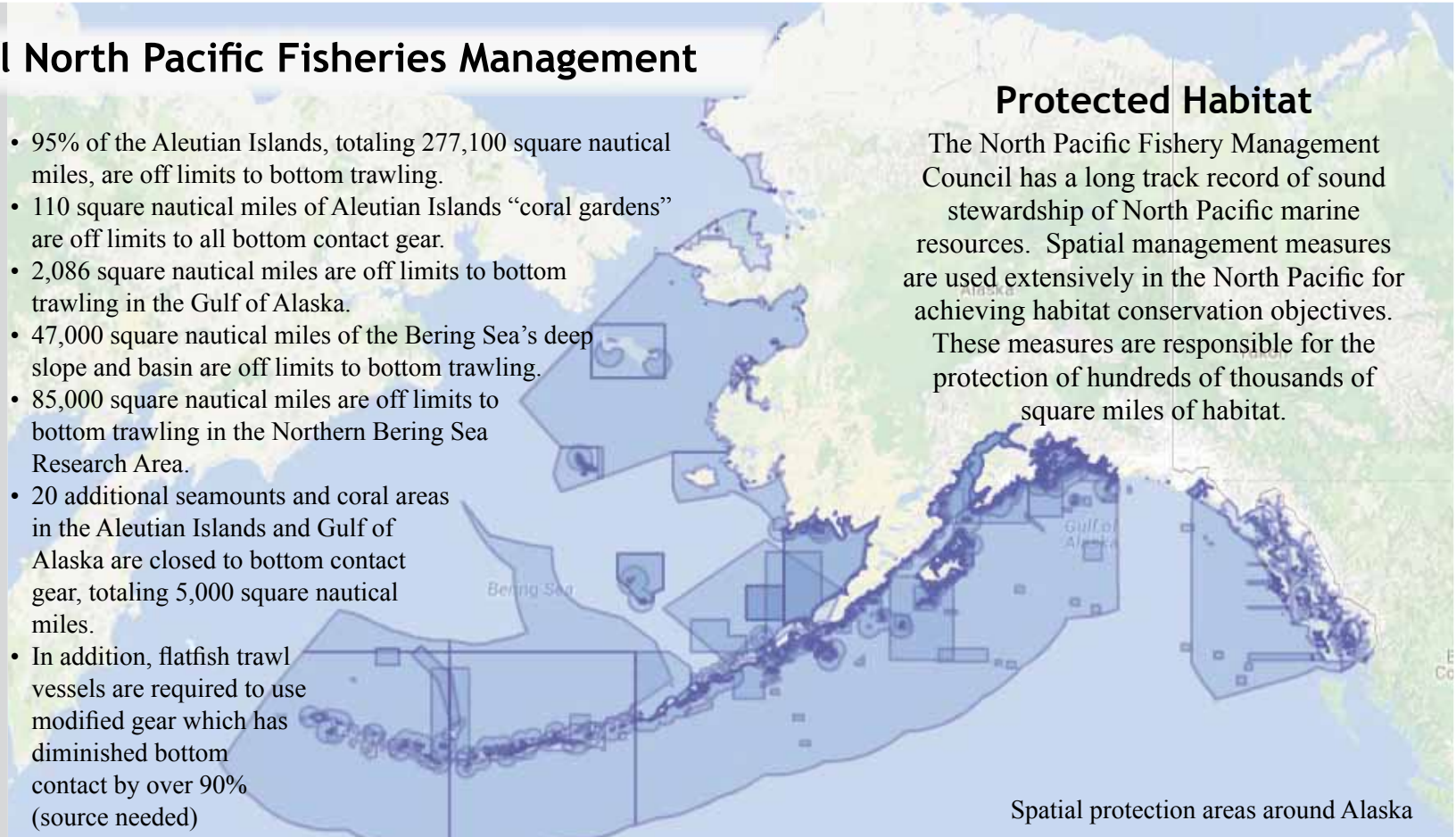
Bering Sea Canyons

The North Pacific Fishery Management Council is contemplating conservation measures for Bering Sea canyons and deep sea coral. Conservation measures will be informed by scientific research currently underway by the Alaska Fisheries Science Center.

http://www.fisheries.noaa.gov/stories/2014/06/6_03_14faq_bering_sea_canyons.html

Backscatter image of Pribilof Canyon

- 95% of the Aleutian Islands, totaling 277,100 square nautical miles, are off limits to bottom trawling.
- 110 square nautical miles of Aleutian Islands “coral gardens” are off limits to all bottom contact gear.
- 2,086 square nautical miles are off limits to bottom trawling in the Gulf of Alaska.
- 47,000 square nautical miles of the Bering Sea’s deep slope and basin are off limits to bottom trawling.
- 85,000 square nautical miles are off limits to bottom trawling in the Northern Bering Sea Research Area.
- 20 additional seamounts and coral areas in the Aleutian Islands and Gulf of Alaska are closed to bottom contact gear, totaling 5,000 square nautical miles.
- In addition, flatfish trawl vessels are required to use modified gear which has diminished bottom contact by over 90% (source needed)



Spatial protection areas around Alaska

Protected Habitat

The North Pacific Fishery Management Council has a long track record of sound stewardship of North Pacific marine resources. Spatial management measures are used extensively in the North Pacific for achieving habitat conservation objectives. These measures are responsible for the protection of hundreds of thousands of square miles of habitat.

A Vital Engine for Coastal Economies

The North Pacific generates over half of the nation’s domestic seafood production, accounting for 5.2 billion pounds in 2012 and over \$1.7 billion in value at the dock. In 2012 the North Pacific seafood industry employed an estimated 55,890 individuals.

Gulf of Alaska fishing vessel

Firm, Science-Based Catch Limits to Attain Sustainability

Fisheries off Alaska are known for the use of precautionary, science based catch limits to prevent overfishing. The result is that no stocks of groundfish are classified as “overfished”. One stock of crab is classified as overfished; however this is largely attributed to environmental factors.

School of Walleye Pollock

Maintaining Ecosystem Productivity

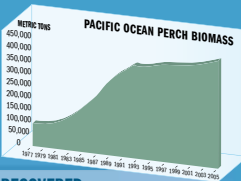
The North Pacific Fishery Management Council has been a leader in the development of ecosystem approaches to fishery management. These approaches include a ban on fishing for forage fish in Federal waters, the development of the Aleutian Islands Fishery Ecosystem Plan, and an Arctic Ocean Fishery Management Plan that takes a precautionary approach to fishing by banning Federal waters fisheries until more is known about the Arctic ecosystem.

Seals in the Bering Sea

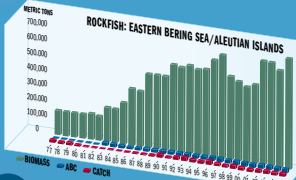
The Alaska Model

Key Findings through 2006

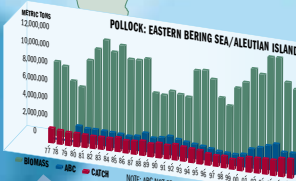
RECOVERED: PACIFIC OCEAN PERCH
 Beaten down by foreign overfishing during the 1960s and 70s, Pacific Ocean perch in the Bering Sea and Aleutians has rebounded under the North Pacific Council's conservative catch limits. Estimated biomass has nearly quadrupled. Data source: NMFS SAFE reports for 2004 and 2005.



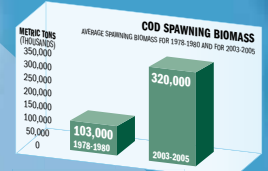
THRIVING: ROCKFISH
 Total rockfish biomass has expanded in the Eastern Bering Sea during three decades of Council management. The secret? Once again, catches are kept well below the limit for sustainable harvests (blue bars for Acceptable Biological Catch).



CAUTIOUS CATCH LIMITS: POLLOCK
 Alaska's enormous pollock resource in the Bering Sea and Aleutians is harvested at the lowest exploitation rate of all fisheries of its kind in the world. Biomass (green towers) above the permitted catch (red). The catch is kept well below the limit, known as the Acceptable Biological Catch (blue), that scientists believe could be safely caught.



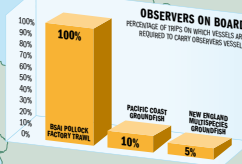
TRIPLED IN THREE DECADES: COD
 The Bering Sea and Aleutians cod stock off Alaska has more than tripled its spawning biomass since the North Pacific Council took over management responsibility. The key? Extremely cautious catch limits leave plenty of fish in the water to multiply.



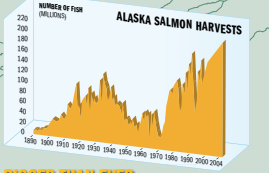
TOUGH LOVE: CRAB STOCKS
 Alaska's fishery regulators followed science and closed fisheries when crab stocks declined. Today, the crabs are safe from overfishing. Alaska's crab fisheries are managed conservatively, and several are under strict rebuilding plans or closed entirely to protect crab populations.



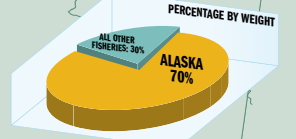
KEEPING WATCH: INDEPENDENT OBSERVERS
 Alaska's fisheries are among the most thoroughly monitored in the world. In Alaska's most prolific fishery, Bering Sea and Aleutians pollock, observers directly track 76% of the catch as it comes aboard. Sources: APA, NMFS, NEFMC.



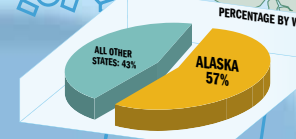
BIGGER THAN EVER: SALMON RUNS
 Alaska's salmon populations are at record levels, generating the largest harvests in history. That's no coincidence. Stung by overfishing in the past, Alaskans mandated sustainable resource management in their constitution when they achieved statehood.



ALASKA'S SHARE OF WORLD'S MSC-CERTIFIED CATCH
 By weight, Alaska produces more than two-thirds of the seafood approved by the world's leading seafood "ecolabel" authority, the Marine Stewardship Council. Alaska salmon, pollock, cod, halibut and black cod all passed rigorous review to earn this mark of ecological soundness.



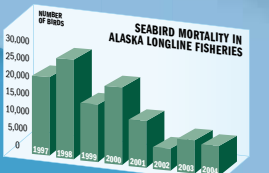
ALASKA'S SHARE OF US SEAFOOD PRODUCTION
 Alaska's fish-rich waters produce 57% of America's seafood catch.



ONCE HUNTED, NOW HARBORED: RIGHT WHALES
 Nearly wiped out by Soviet whalers, Alaska's right whales are now protected from human hunters and watched over by fishermen. To help recover the endangered whale, NOAA designated 98,750 square miles off Alaska as critical habitat in 2006. The fishing industry and NOAA have published a guide to help fishermen identify and avoid entangling these whales.

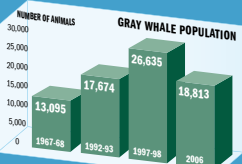


SEABIRD MORTALITY IN ALASKA LONGLINE FISHERIES
 New seabird avoidance procedures have enabled Alaska longliners to prevent entanglement of thousands of fulmars, albatrosses, and other marine birds. Seabird mortality has dropped by 77 percent since 1997.

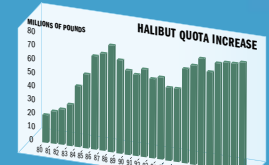


PROTECTED
 Year-round and seasonal fishing closures (indicated by the light blue shaded areas) protect more than 395,000 square miles of marine waters off Alaska—preserving corals and other sea life.

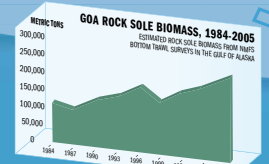
SAVED: THE GRAY WHALE
 Gray whales have recovered to historic population levels off Alaska and the North American coast. In 1994, the gray whale was removed from the endangered species list, no longer threatened by extinction. Since the mid-1990s the population has fluctuated normally at high levels.



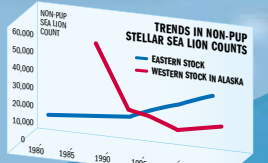
REBUILT: PACIFIC HALIBUT
 Alaskans and Canadians teamed up to end overfishing of halibut in the 1920s. Their conservation culture still pays dividends: The allowable halibut catch has more than tripled since 1980.



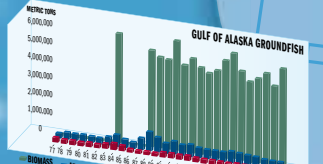
DOUBLED IN 20 YEARS: ROCK SOLE
 Rock sole, prized for its valuable roe, has thrived under careful catch limits and favorable ocean conditions. Its biomass in the Gulf of Alaska has nearly doubled since the mid-1990s.



ON THE MEND? STELLER SEA LIONS
 Alaska's endangered western Steller sea lions appear to be bouncing back. Surveys showed an 11.12% increase in adults and juveniles between 2000 and 2004—reversing a long decline. The 2006 survey failed to produce a complete count, leaving the current trend uncertain. Alaska commercial fishermen stopped shooting and ended nearly all accidental entanglement of sea lions by the early 1990s.



SAFE & STRONG: GULF GROUNDFISH
 Gulf of Alaska groundfish are harvested (red) at only a fraction of the Acceptable Biological Catch (blue), leaving most of the biomass (green) untouched.



Protected Abundant Sustainable

Poster available through MCA (907) 523-0731