



# 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