

Alliance of Communities for Sustainable Fisheries
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September 5, 2008

Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland OR 97220-1384

Dear Chairman Hansen,

Please accept these comments on behalf of the Alliance of Communities for Sustainable Fisheries regarding the PFMC's draft 2008 research and data needs report.

Regarding section C.4 (page 16), the ACSF is supportive of the research described in this draft document. We feel that this research should be done, although we do not believe, based on our experience, that any critical habitat destruction issues exist. Since modifications to bottom trawl gear were enacted, it is our experience that fishermen actively try to avoid having their trawl nets contact rocky structure. They either fish along the edge of the structure, or slightly above it. With regard to trawling over soft bottom habitats, it is our direct experience that these areas remain productive for the same types of fish year after year. Therefore, on an anecdotal basis, it's hard to believe that any significant destructive habitat issues exist. Nevertheless, the ACSF is supportive of the Council conducting further research on these questions. While some have suggested that special fishery management zones be enacted based on the precautionary approach, and only opened if no impacts are determined, we hope that the Council does not embrace this suggestion except in circumstances where there is already evidence that unique, and especially fragile, habitats exist that might not already be covered under the Council's EFH designations.

Regarding section 8.3 (page 53, the first bullet), the ACSF believes that this assessment of the effect of various fishing gears is important and should be a priority project. We also point out that much of this assessment of impacts of fishing gears comes down to societal values and the needs of the nation for food. We must not forget that much of the nation has had natural habitats converted to food or timber production. For the ocean, we note that high habitat quality and historic food production are often found in National Marine Sanctuaries.

Last, the ACSF would like to quote from the Council's White Paper "Marine Reserves...Objectives, Rationales, Fishery Management Implications and Regulatory Requirements (September 2004). This White Paper states in part:

“Establishment of research reserves essentially requires that exclusive use of an area be given to a particular user group (scientists). Thus in weighing research benefits against costs, it is important to consider not only research costs but also the costs associated with displacement of other user groups from the area. Proposals for research reserves should provide reasonable assurance that they will yield conclusive and policy-relevant results if policy makers are to be receptive to the establishment of reserves solely on the basis of research In the U.S., research on reserves is more likely to be conducted opportunistically than at reserves established primarily for that purpose. While opportunistic research is necessarily conducted under less than ideal statistical design conditions (see Section III), it may provide valuable information that could not otherwise be obtained.”

We hope that the Council will make full use of existing spatial management areas and natural refugia before it considers removing additional areas for research purposes, especially if that research can be conducted by existing measures, or even measures elsewhere in the world. This comment is particularly aimed at research on “trophic interactions”.

Sincerely,

Frank Emerson
Co-Chair, ACSF

Supporting Associations & Organizations

Pacific Coast Federation of Fishermen’s Association
Port San Luis Commercial Fishermen’s Association
Morro Bay Commercial Fishermen’s Association
Monterey Commercial Fishermen’s Association
Fishermen’s Association of Moss Landing
Santa Cruz Commercial Fishermen’s Marketing Association
Half Moon Bay Fishermen’s Marketing Association
Fishermen’s Alliance
Western Fishboat Owners Association
Ventura County Commercial Fishermen’s Association
Federation of Independent Seafood Harvesters
Golden Gate Fishermen’s Association
Port San Luis Harbor District
City of Morro Bay Harbor
City of Monterey Harbor
Moss Landing Harbor District
Santa Cruz Port District
Pillar Pt. Harbor, San Mateo County Harbor District