

Alliance of Communities for Sustainable Fisheries
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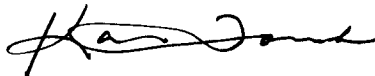
Nancy Sutley
Chair, Council on Environmental Quality
Chair, Interagency Task Force on Ocean Policy
722 Jackson Place, NW
Washington DC, 20503

Dear Ms Sutley,

On behalf of the Alliance of Communities for Sustainable Fisheries, a Central California Coast regional association of fishing and community interests, I am writing to provide comments to the Interagency Ocean Policy Task Force.

We are writing to provide our concurrence and support for the comments previously made to the interagency Ocean Policy Task Force from the Western Pacific Regional Fishery Management Council (WPRFMC) dated July 30 2009. The statement of needs and recommendations found in this comment letter match well with the needs that we have identified here on the California Central Coast. Obviously, references to Island Cultures and specific issues related to that are not germane directly to the Central Coast; however our organization does strongly represent the heritage and culture of fishing within our Central Coast communities. Therefore the general concerns expressed in the WPRFMC letter for protecting these cultural features are valid for us as well.

I have attached a copy of the WPRFMC letter. Thank you for your consideration of our remarks.



Kathy Fosmark
Co-Chair, ACSF



WESTERN
PACIFIC
REGIONAL
FISHERY
MANAGEMENT
COUNCIL

July 30, 2009

To: The White House Council on Environmental Quality and the Interagency Task Force on Ocean Policy

Regarding: A National Policy for the Oceans, Our Coasts, and the Great Lakes

From: The Western Pacific Regional Fishery Management Council (WPRFMC)

Regarding the Four Issues Outlined in the July 30 Briefing, the WPRFMC recommends:

1. National Policy for oceans, coastal and Great Lakes ecosystems

A National Ocean Policy should:

- adopt a bottom-up approach by including the public and especially fishing communities in regional-based planning efforts
- include consideration of communities needs, traditional values, indigenous cultures (e.g. in the Western Pacific¹ we have indigenous Chamorro and Refaluwasch, American Samoan, and Native Hawaiian, among others) and fisheries/economic development
- include consideration of island cultural ties which are intimately entwined with the archipelagos and the marine environment on which they depend and have managed with traditional knowledge for thousands of years
- be driven by science (i.e. scientifically-based and peer reviewed research) including the social sciences and economics
- consider local conditions including those in U.S. territories
- be consistent with the Magnuson-Stevens Fishery Conservation and Management Act (MSA), National Environmental Policy Act (NEPA), Endangered Species Act (ESA) and other statutes
- evaluate existing marine conservation measures implemented by the regional fishery management councils (RFMCs) (e.g. closed areas, catch limits, limited entry, protected species mitigations, etc.)
- have clear objectives, measurable criteria for success, and monitoring
- use an adaptive management approach to respond to changing conditions
- coordinate, not replace, existing, regional expertise in a collaborative process, and
- not create another layer of bureaucracy or authority

¹ See the Western Pacific Regional Fishery Management Council's website for more information at <http://wpcouncil.org>

The policy's action plan should include funding for these and other initiatives:

1. Fostering the shift to ecosystem-based fishery management through existing management authorities (RFMCs and NMFS) using a collaborative regional effort.
2. Promoting public education and awareness of healthy sustainable U.S. fisheries (most U.S. fisheries are model fisheries for other nations and should be promoted as such) and allow our nation's fisheries managers (RFMCs and NMFS) to make fisheries decisions based on science; and the MSA which requires transparency and a bottom-up approach.
3. Expanding ocean and fisheries scientific information, research, and monitoring (e.g. research on life history parameters of managed fish stocks (MUS) to foster effective stock assessments, setting allowable catch limits (ACLs), implementing limited access privilege programs (LAPPs) and Catch Shares Programs, and other management)
4. Promoting public education and outreach to other nations on responsible U.S. fisheries bycatch mitigation successes (e.g. the Hawaii-based shallow-set longline fishery has reduced sea turtle and seabird bycatch by over 90 percent)
5. Fostering sustainable fisheries development throughout our diverse U.S. communities including U.S. territories which have borne the burden of having large areas of their coastal waters placed off limits to fishing through U.S. Monument, Reserve, and Sanctuary designations (e.g. the Marianas, American Samoa and Hawaii Archipelagos) and through increased military activities in nearshore waters and coastal lands (e.g. the large military build-up in Guam, increased bombing practice at islands in the Marianas Archipelago)
6. Ensuring clean coastal and nearshore waters and beaches using a holistic 'watershed' (e.g. ahupua`a in the Hawaii Islands) point of view (e.g. restoring freshwater flow into nearshore waters where it has been eliminated, channelized or reduced; ensuring non-point source runoff doesn't enter nearshore waters directly; upgrade sewage treatment facilities to ensure rain events don't cause spills, etc.) and by increasing ocean awareness and literacy among the public
7. Implementing effective ecosystem-based management of our ocean and coastal resources (e.g. implementing fishery ecosystems plans)
8. Promote fisheries education and development programs in areas which have experienced reduction in their fisheries due to regulatory measures or loss of waters available to fish in (e.g. Monument designations; limited entry programs, fisheries closing due to reaching total allowable catches (TACs), etc.)

2. Ocean governance framework

A framework for ocean governance should include ensuring regional differences and considerations with regards to any resource planning initiatives; i.e. one size does not fit all in U.S. waters. For example, the Western Pacific region contains little landmass in the form of archipelagos surrounded by vast waters with local communities which depend on fish stocks for their livelihood, survival, and traditions. Therefore, the framework for policy coordination of efforts must include specific community-based input from all regions and not be top-down from Washington DC in order for it to adequately address regional differences and needs.

In order to effect change with regards to improving stewardship and ensuring protection, maintenance and sustainability of our ocean resources, a coordinated approach using existing authorities and structures would be best suited for success. One model of this type of effort is in the Western Pacific region where species-based fishery management plans are being replaced with ecosystem-based geographic-centered (i.e archipelagic) fishery ecosystem plans (FEPs) including the American Samoa, Hawaii Islands, Mariana Islands, and Pacific Remote Island Areas Archipelagos along with the Pacific Pelagics FEP. Implementation of the FEPs includes formation of Archipelagic FEP Regional Ecosystem Advisory Committees (REACs). The REACs membership includes local government officials (mayors, councilpersons), local environmental agency personnel, university researchers with expertise in coastal matters, federal agency personnel, fishery council members, and other invited speakers and experts. Similar to the National Policy, the purpose of the REACs are to bring together decision makers from ocean, coastal, and terrestrial management agencies to discuss the stressors and issues facing the marine environment, come up with recommended solutions, and facilitate actions to solve the problems. We recommend a coordinated effort such as this, utilizing existing authorities (including RFMCs), as the optimal way to effect “on-the-ground” problem resolution on a national scale to meet the goals and objectives of the National Policy without creating an additional layer of bureaucracy.

The ocean governance framework should consider and where applicable adopt the requirements of the MSA with regards to ocean governance, specifically the National Standards (Section 301) and the community development program and other regional programs (Section 305).

To ensure planning and management decisions are based on the best available science (bona fide and peer reviewed research), funding for research on climate change, ocean acidification and other potential large-scale ocean impacts should be distributed regionally including to areas outside the continental U.S. (i.e. U.S. territories). Programs promoting cooperative research should also be included in the framework to promote working with local fishery participants.

3. Implementation Strategy to meet national policy objectives

An implementation strategy to meet national objectives must include direct input from all regions in order for it to adequately address regional differences and needs using a bottom-up approach. The Western Pacific region has different challenges and needs than other U.S. coastal states and therefore local participation (including the WPRFMC with regards to fisheries and fishery habitat) is imperative. Coordinated, existing regional management authority must be integral to a collaborative implementation strategy with decisions made on the regional level.

4. Coastal and marine spatial planning

Allow regional fisheries managers to continue to make management decisions, based on science, on how to best manage their fisheries with regards to spatial planning (i.e. marine managed areas, marine protected areas, fishing restricted zones, etc.), implementing, enforcement, and monitoring. This is currently undertaken with input from the public and fishing communities and would be burdened by adding another layer of bureaucracy. Planning through the national ocean policy should not allow the agendas of non-governmental organizations to drive national or local policy on fisheries management and spatial planning. The expertise and the regulatory authority, as mandated by Congress, is with NMFS and the RFMCs, pursuant to the MSA, and local authorities for nearshore waters, and should remain there. Required performance metrics and rigorous science-based monitoring of marine spatially-managed areas should always be included in designation of any managed area to evaluate effectiveness and allow for modification or elimination of non-performing areas.

To effectively maintain or improve habitat and ecosystem function, coastal and marine spatial planning should include identification of nearshore water stressors through rigorous scientific examination and include plans to reduce stressors (e.g. ensuring non-point source runoff doesn't enter nearshore waters directly; upgrade sewage treatment facilities; implement effective erosion control measures, i.e. "stop it at the source"; require large development setbacks and infrastructure upgrades as part of any coastal development, pollution abatement, etc.) to improve marine habitats. Once again, regional differences should be recognized and addressed, and public input and local knowledge be included in coastal and marine spatial planning programs.