



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
National Marine Sanctuary Program

West Coast Region
99 Pacific Street, Bldg. 200, Suite K
Monterey, CA 93940

October 29, 2008

Mr. Donald Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

RE: Comments on the Groundfish Trawl Fishery Rationalization

Dear Mr. Hansen:

Please accept comments from the Office of National Marine Sanctuaries (ONMS), West Coast Region on the Pacific Fishery Management Council's (PFMC) draft Amendment 20 to the Groundfish Fishery Management Plan: Rationalization Program for the West Coast Groundfish Trawl Fishery.

The west coast National Marine Sanctuaries support the rationalization of the west coast groundfish trawl fishery, particularly if the individual fishing quota (IFQ) system allows for fishermen to switch to non-trawl gear types that allow ecologically and economically sustainable fishing that is less damaging to the seafloor and reduces or even eliminates bycatch. An outcome of the PFMC's action should be to adopt such a system to provide a 'safer and cleaner way of fishing' in west coast waters, including the five west coast National Marine Sanctuaries.

National Marine Sanctuaries are formally designated, special areas that warrant special considerations. Given this, we are interested in working with the PFMC and others to reduce or eliminate trawling within sanctuaries because of its impacts on benthic habitats and bycatch levels, while also promoting the expansion of ecologically sustainable gear types for economically sustainable fisheries in sanctuary waters. By improving stewardship of fishery resources and community access to the resource, systems of IFQs have been shown to improve the economic and ecological sustainability of fisheries worldwide. The west coast National Marine Sanctuaries support regulatory and non-regulatory actions that lead to healthy ecosystems and healthy fisheries within sanctuaries. If designed properly with elements we have requested above, a system of IFQs for the groundfish fishery can help achieve this goal.

Thank you for the opportunity to provide public comment on the rationalization of the groundfish trawl fishery on the west coast.

Sincerely,

William J. Douros, Regional Director
West Coast Regional Office

Olympic Coast
National Marine Sanctuary
115 E. Railroad Ave., Ste 301
Port Angeles, WA 98362

Cordell Bank
National Marine Sanctuary
P.O. Box 159
Olama, CA 94950

Gulf of the Farallones
National Marine Sanctuary
Building 991, Presidio of SF
San Francisco, CA 94120

Monterey Bay
National Marine Sanctuary
299 Foam Street
Seaside, CA 94130

Channel Islands
National Marine Sanctuary
115 Harbor Way
Santa Barbara, CA 93101