

January 28, 2012

Mr. Eric Olson
Council Members
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: D2-Bering Sea FEP, Canyons Workshop

Dear Chairman Olson and Council Members,

Thank you for holding the Bering Sea Canyons Public Workshop and for providing the opportunity for attendees to discuss tools for reducing fishing impacts and protecting Bering Sea slope habitat. Five conservation organizations – Greenpeace, Oceana, Marine Conservation Institute, Center for Biological Diversity, and World Wildlife Fund – collaborated to present gradations of tools/management measures that would help NMFS and the NPFMC fulfill their responsibility to ensure those protections and interim measures the fishing industry could take in the meantime.

Sustainable Management of Bering Sea Canyon-Slope Habitat

To achieve the objective of minimizing adverse impacts to Essential Fish Habitat including corals and sponges, and protecting representative Bering Sea slope habitat, management of Bering Sea Slope and Canyons (Pribilof & Zhemchug) should be designed to achieve a multitude of protections and ecosystem benefits, including but not limited to:

1. conserving fragile coral and sponge essential fish habitat
2. protecting a representative portion of the Green Belt habitat
3. providing refugia in the Bering Sea
4. mitigation of bycatch of commercially important and keystone species
5. protecting habitat essential for pelagic species e.g, spawning and foraging areas
6. providing reference areas to better gauge the ecosystem effects of climate change and fishing
7. protecting rare or vulnerable benthic habitats
8. promoting research and monitoring focused on marine living resources
9. protecting large-scale ecosystem processes responsible for the productivity and functional integrity of the ecosystem

Based on the best available science including visual data, trawl and longline survey data, bycatch data, and modeled predictions of coral habitat as indicators of vulnerable and sensitive habitat there is every indication that Pribilof and Zhemchug Canyons contain a large portion of the coral and sponge habitat in the Bering Sea. Protecting these and other canyons will help the Council meet several important management and conservation objectives. Protecting a portion of the shelf break will support the resilience of this important ecoregion, and provide stakeholders with an invaluable insurance policy that will help ensure the long-term sustainability of the ecosystem and the fisheries that depend on it.

Specific tools and/or management measures to provide protection for canyon and slope habitat should include:

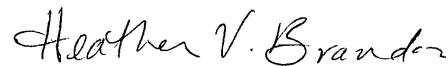
1. Fully protected closures of representative habitat types
2. Exclusion of bottom-contact fishing gear
3. Designated exclusive zones for limited access for the Pribilof Islands-based fisheries
4. Net monitors used to insure pelagic trawls maintain a minimum distance off the bottom and avoid any accidental bottom contact
5. Incorporate net depth and distance-to-bottom monitor data into Observer Reports
6. Adaptive Management: Coral and sponge bycatch limit with move-on protocol, temporary closures and subsequent research protocol

Sincerely,

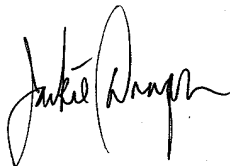
Jon Warrenchuk
Senior Scientist and Campaign Manager
Oceana



Heather Brandon
Senior Fisheries Officer
World Wildlife Fund



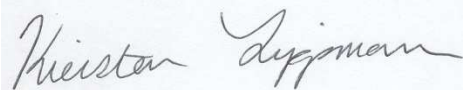
Jackie Dragon
Senior Oceans Campaigner
Greenpeace



Lance Morgan
President
Marine Conservation Institute



Kiersten Lippmann
Conservation Biologist
Center for Biological Diversity



Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D-12)

Dear Chairman Olson and NPFMC Members,

As Washington-based businesses we all have a strong connection to the ocean, and a deep respect for the invaluable services the ocean provides. We support the growing campaign to protect the Bering Sea Canyons, the largest underwater canyons in the world.

These extraordinary canyons occur in the heart of the most productive of Bering Sea waters where the shelf plunges into depths that were once out of reach to fishermen. But today, technology and ever bigger boats can reach fish even in these depths. Zhemchug and Pribilof canyons contain high concentrations of deep sea corals and sponges, forming havens for commercially important fish, crab and other marine life. We are concerned about the potential long-term effects to the Bering Sea ecosystem if we continue to destroy in minutes habitat that took decades or even hundreds of years to form.

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While we all recognize the value of healthy oceans, some of us are in the business of providing Washington's well-known quality seafood to local patrons and visitors and we are directly invested in supporting sustainable fisheries. We want to ensure that the Bering Sea, "America's Fish Basket", continues to provide the seafood products and jobs that sustain our businesses, our economy, and the broader health of our planet.

We appreciate the important work you do to manage our invaluable Bering Sea resources. With so much uncertainty and change to consider it makes good sense to protect some of the most valuable parts of our "fish basket" as an insurance policy against costly miscalculations. Securing some places for scientific research and ecological recovery will give us the best chance of maintaining resilient fisheries throughout these changing times. We urge you to act quickly to adopt protections for vulnerable coral and sponge habitats in the Bering Sea canyons.

Sincerely,

Printed Name: Frank Trevino

Business Name: Toast

Title: Owner

Address: 5615 24th Ave NW

Seattle WA 98107



Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D)2

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Sincerely,

Printed Name: DIANA NARAMORE *Diana Naramore*
Business Name: SIP AND SHIP
Title: OWNER
Address: 1702 NW MARKET ST
SEATTLE, WA 98107

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D) 2

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Sincerely,

Printed Name: Ulise Guenther

Business Name: UFrame It

Title: manager

Address: 5601 20th Ave NW 98107

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Sincerely,

Printed Name: Robert Hon

Business Name: Bears Nest

Title: Mgr.

Address: 2008 NW 50th St

Seattle WA 98107



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
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Sincerely,

Printed Name: Brian Miller

Business Name: MILLER CREATIVE WORKSHOP / ? Manager Ballard Blossom

Title: OWNER

Address: 1766 NW Market St



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Mr. Eric Olson
Council Members
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605 West 4th Avenue, Suite 306
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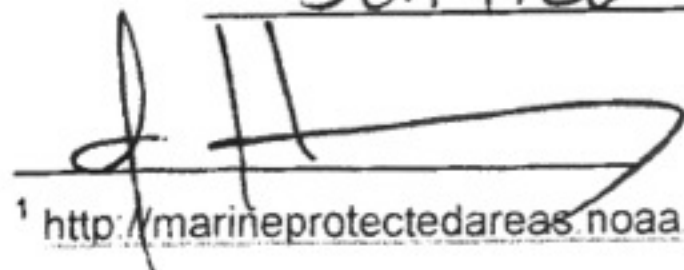
Printed Name: JASON HARRIS

Business Name: BLOOM RESTAURANT

Title: OWNER

Address: 5410 17th AVE NW

SEATTLE WA 98107



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
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605 West 4th Avenue, Suite 306
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Sincerely,

Printed Name: Gean Lockhart
Business Name: CCC Ballard
Title: CO-Manager
Address: 1701 New Market
Ballard, Seattle, WA, 98107



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Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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Sincerely, 

Printed Name: David Johnson

Business Name: Electric & Folding Bikes Northwest

Title: Owner

Address: 4810 17th Ave NW
Somerville WA 98107

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Council Members
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Sincerely,

Printed Name: Shirley JANE Cobb-Benecki

Business Name: WALTS Organic Fertilizer Co.

Title: co-owner / mngr.

Address: 1528 N.W. Leary Way
Seattle, Wa. 98107

Shirley Jane Cobb-Benecki

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

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Sincerely,

Printed Name: KIM ALBERT

Business Name: FULL TILT BALLART

Title: MANAGER

Address: 5453 LEARY AVE NW

SEATTLE WA 98107



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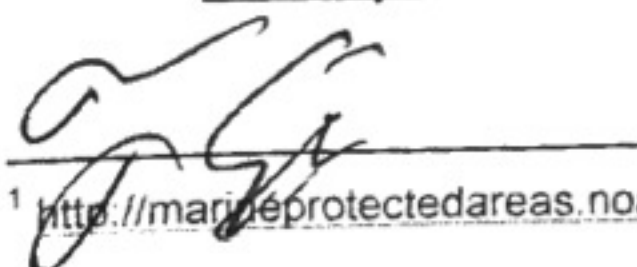
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Sincerely,

Printed Name: Tony Cunningham
Business Name: Johnny's Shoe Service
Title: Owner
Address: 5510 22nd Ave NW
Ballard WA 98107



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D) - 2

Dear Chairman Olson and NPFMC Members,

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Sincerely,

Printed Name: FRANK DUBBS
Business Name: CLASSIC CONSIGNMENT
Title: OWNER
Address: 5514 24TH AVE NW
SEATTLE WA 98107

Frank Dubbs

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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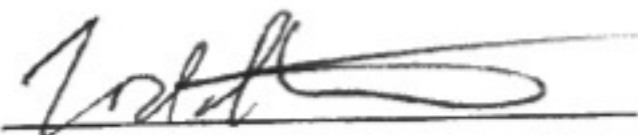
Printed Name: TODD WALTERS

Business Name: BIKE SPORT

Title: MANAGER

Address: 5601 24th AVE NW

SEATTLE, WA 98107



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D)-2

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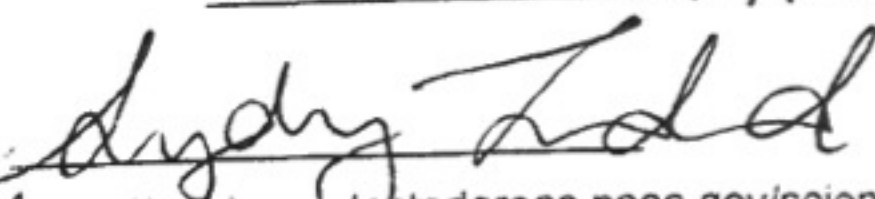
Sincerely,

Printed Name: Sydney Ladd

Business Name: Scooters Burgers

Title: Manager

Address: 5802 28th Ave NW
Seattle WA 98107



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D) - 2

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Sincerely,

Printed Name: Joni Arshved
Business Name: Mr. Gyros
Title: Manager
Address: 5520 20th Ave NW.
Seattle WA 98107



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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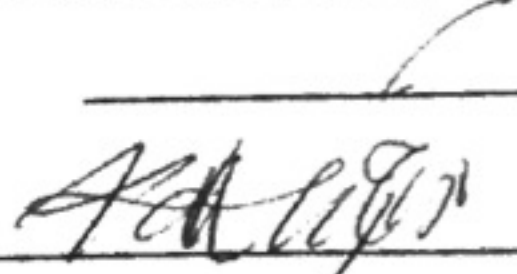
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Sincerely,

Printed Name: KATHY TRAV
Business Name: LT Nails
Title: Nails Tech
Address: 2309 NIX Market CT



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item (D)-2

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Sincerely,

Printed Name: Ben Knudsen

Business Name: Digs

Title: Owner

Address: 2002 NW Market St.
Seattle, WA 98107

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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Sincerely,

Printed Name: Lexy Ashley
Business Name: Lucca Great Foods
Title: Sales Associate
Address: 5332 Ballard Ave NW
Seattle, WA 98107

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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Sincerely,

Printed Name: Ameer Radwan
Business Name: Couch Seattle
Title: Mgr
Address: 5423 ballard ave NW
98107

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
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Sincerely,

Printed Name: MARJORIE MILLER

Business Name: Moxie Nutrition

Title: Business Owner

Address: 11235 Palatine Ave N

Seattle WA 98133

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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Sincerely,

Printed Name: CHRIS WERB

Business Name: DELLA GROUP

Title: _____

Address: P.O. BOX 31302
SEATTLE, WA 98103

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
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North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
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Sincerely,

Printed Name: Charles Hadfann
Business Name: Wright Bros. Cycle Works
Title: Owner
Address: 219 N. 36TH ST.
Seattle, WA. 98103

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

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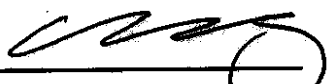
Our oceans are under pressure from climate change, overfishing, habitat loss, acidification, and pollution. According to NOAA scientists climate change is having a profound impact on ocean ecosystems, and marine protected areas are being increasingly recognised as a key tool for maintaining and restoring ecosystem resilience in a changing climate.¹ We must safeguard ocean productivity today, and not wait until a combination of stressors undermines the sea's ability to support thriving ecosystems. Seafood must be caught in ways that maintain the diversity, structure, and function of ecosystems while minimizing adverse impacts such as the destruction of essential fish habitat and the wasteful bycatch of marine life.

While we all recognize the value of healthy oceans, some of us are in the business of providing Washington's well-known quality seafood to local patrons and visitors and we are directly invested in supporting sustainable fisheries. We want to ensure that the Bering Sea, "America's Fish Basket", continues to provide the seafood products and jobs that sustain our businesses, our economy, and the broader health of our planet.

We appreciate the important work you do to manage our invaluable Bering Sea resources. With so much uncertainty and change to consider it makes good sense to protect some of the most valuable parts of our "fish basket" as an insurance policy against costly miscalculations. Securing some places for scientific research and ecological recovery will give us the best chance of maintaining resilient fisheries throughout these changing times. We urge you to act quickly to adopt protections for vulnerable coral and sponge habitats in the Bering Sea canyons.

Sincerely,

Printed Name: Heather Hedemann
Business Name: Petapoluza
Title: Owner
Address: 114 N 36th Seattle,
WA 98103



¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda Item ()

Dear Chairman Olson and NPFMC Members,

As Washington-based businesses we all have a strong connection to the ocean, and a deep respect for the invaluable services the ocean provides. We support the growing campaign to protect the Bering Sea Canyons, the largest underwater canyons in the world.

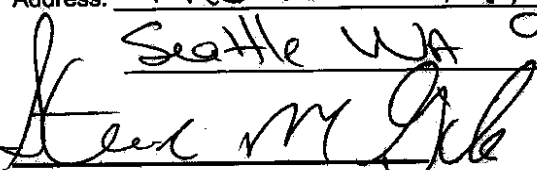
These extraordinary canyons occur in the heart of the most productive of Bering Sea waters where the shelf plunges into depths that were once out of reach to fishermen. But today, technology and ever bigger boats can reach fish even in these depths. Zhemchug and Pribilof canyons contain high concentrations of deep sea corals and sponges, forming havens for commercially important fish, crab and other marine life. We are concerned about the potential long-term effects to the Bering Sea ecosystem if we continue to destroy in minutes habitat that took decades or even hundreds of years to form.

Our oceans are under pressure from climate change, overfishing, habitat loss, acidification, and pollution. According to NOAA scientists climate change is having a profound impact on ocean ecosystems, and marine protected areas are being increasingly recognised as a key tool for maintaining and restoring ecosystem resilience in a changing climate.¹ We must safeguard ocean productivity today, and not wait until a combination of stressors undermines the sea's ability to support thriving ecosystems. Seafood must be caught in ways that maintain the diversity, structure, and function of ecosystems while minimizing adverse impacts such as the destruction of essential fish habitat and the wasteful bycatch of marine life.

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Sincerely,

Printed Name: Steven Giles
Business Name: Maritime Foods
Title: Partner
Address: 4416 Fremont Ave N
Seattle WA 98103


¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>



January 28, 2014

Eric Olsen, Chairman
Chris Oliver, Executive Director
Steve Maclean, Protected Resources Coordinator
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska, 99501

**Re: TDX Comments for North Pacific Fishery Management Council's
February 3, 2014 Bering Sea Canyons Workshop**

Gentlemen:

The Tanadgusix Corporation ("TDX"), the Alaska Native Village Corporation for St. Paul Island, appreciates that the North Pacific Fishery Management Council ("Council") and its Staff are encouraging stakeholder participation as the Staff develops a discussion paper. The paper will address possible measures for the conservation and management of deep sea coral in the Pribilof and Zhemchug Canyons, among other issues. TDX asks that the Council and Staff consider these comments as input for the workshop and that they be placed in the record of the proceeding. TDX has also submitted comments on the Council's Ecosystem Vision Statement that track recommendations it makes here.

TDX is very sensitive to the importance of the Canyons as fishing areas. Fishing provides a critical economic base for St. Paul and many of its residents depend on fishing for their primary livelihood. The Council should balance these important interests as it considers developing any Canyon protection measures.

As the Council considers coral protection measures, it also should take into account impacts its actions could have on the Northern Fur Seal population, and in particular, female fur seals feeding their young during the April to November months in and around these two Canyons.

Although balanced fishery management actions can protect our local environment and ensure successful fisheries, some actions can have negative consequences that the Council may not have anticipated or planned for. For example, if the Council closed or limited fishing in a particular area, it could push fishing boats into an area of the Canyons

where fishing would compete with female fur seals preying on the same fish stock.¹ It is our understanding that Council actions under discussion actually could increase fishing proximity to the fur seal feeding areas.

The viability of the Northern Fur Seal population is of grave concern to TDX. The Pribilofs are home to the largest breeding grounds for Northern Fur Seals in the world. In 2010, the Pribilof Islands' Northern Fur Seal population accounted for ~566,000 of the estimated ~671,000 stocks for all Northern Fur Seals breeding in the United States.²

The Pribilof Islands' Northern Fur Seal population is in serious decline. According to the Alaska Fisheries Science Center's National Marine Mammal Laboratory's 2013 analyses, the Northern Fur Seal pup production decreased a staggering 4.8% annually from 1998 to 2012.³ A documented decrease of ~65% of adult males on St. Paul Island (from around 20,000 in 1992 to around 7,000 in 2012) is equally alarming.⁴ The Pribilof Islands' female fur seal foraging area, as shown in the Robson map below, significantly overlaps certain parts of the Pribilof and Zhemchug Canyons, as well as the shelf break.⁵ As the NMFS Steller Sea Lion/Northern Fur Seal 2007 EIS, stated: "The Pribilof Islands support high concentrations of marine mammals, seabirds, fish, and invertebrates. This biodiversity and biological productivity results from the proximity of the islands to the continental shelf break, particularly Pribilof Canyon, along with the general ecological complexity of the isolated island habitat and its assemblage of nearshore habitats, sea cliffs, beaches, sand dunes, and coastal wetlands unique in the central Bering Sea (NMFS 2005b)."⁶ Clearly, these Canyons are critical to the preservation of the Islands' rookeries.

¹ As NMFS cautioned in the 2007 Steller Sea Lion and Northern Fur Seal Research Final Programmatic Environmental Impact Statement: "The EIS for the annual subsistence harvest of fur seals determined that the groundfish fisheries in combination with the subsistence harvest may have a conditional cumulative effect on prey availability if the fisheries were to become further concentrated spatially or temporally in fur seal habitat, especially during June through August. (NMFS 2005(b)." United States Department of Commerce: National Oceanic and Atmospheric Administration: National Marine Fisheries Service, Alaska Region, "Bering Sea Chinook Salmon Bycatch Management Volume I Final Environmental Impact Statement," p. 454 (December 2009).

² Testa, J. W. (editor). Fur seal investigations, 2010-2011, U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-241, 77 p. 13 (2012).

³ Rod Towell, Rolf Ream, John Bengtson and Jeremy Sterling, "2012 northern fur seal pup production and adult male counts on the Pribilof Islands, Alaska," Alaska Fisheries Science Center National Marine Mammal Laboratory, pp 4-5 (2013).

⁴ *Id.*

⁵ Robson, et al., "Separation of foraging habitat among breeding sites of a colonial marine predator, the northern fur seal (*Callorhinus ursinus*)," *Can. J. Zool.* Vol. 82, p. 21 (2004).

⁶ United States Department of Commerce: National Oceanic and Atmospheric Administration: National Marine Fisheries Service: Office of Protective Resources, Permits Division. "2007 Steller Sea Lion and Northern Fur Seal Research Final Programmatic Environmental Impact Statement," p. 3- 81 (May 2007).

As the Staff develops its discussion paper, we ask that it highlight these issues for the Council as a priority for further scientific research. The Council should consider the impacts of potential management measures on the female Northern Fur Seal population foraging areas in the Canyons.

Pribilof residents have urged additional study on fishery management's effect on Northern Fur Seals for several years. Within the "Scoping Report for Northern Fur Seal Harvest Regulations Environmental Assessment, April 2012," the May 17, 2011 St. George Island Public Meeting Notes report a lengthy group discussion regarding the trawl fleet commercial fishery regulations with respect to the fur seal population as well as the disproportionate protection measures afforded Stellar Sea Lions.⁷ This discussion "concluded" with Michael Williams (NMFS) stating "that there is ongoing scientific effort to better understand the changes and analyze the effects of the fisheries on the northern fur seals." However, the Pribilof residents are still not seeing any new or meaningful additional studies on fishery management's effect on Northern Fur Seals and their critical habitat in the Pribilof and Zhemchug Canyons.

Since the Council is evaluating Bering Sea Canyon protection measures now, tracking studies should be initiated to gather data on Northern Fur Seal foraging patterns in the Canyon areas during the April-November months and other relevant issues that will shed light on the potential impact of those measures on the Northern Fur Seal population. Potentially, tracking could be done using UAV rather than expensive satellite time to save costs. TDX would be very interested in exploring whether the studies could be conducted through private/federal government cooperation.

We appreciate the Department of Commerce's efforts to consult with Native groups and the Council's special efforts along these lines, including rural outreach. These efforts help carry through Congress's directive that federal agencies consult with Alaska Native Corporations on the same basis as they consult with tribes under Executive

⁷ National Marine Fisheries Service, "Scoping Report for Northern Fur Seal Harvest Regulations Environmental Assessment," p. 61 (April 2012).

Order 13175.⁸ We look forward to continuing communications throughout the Council process.

Sincerely,

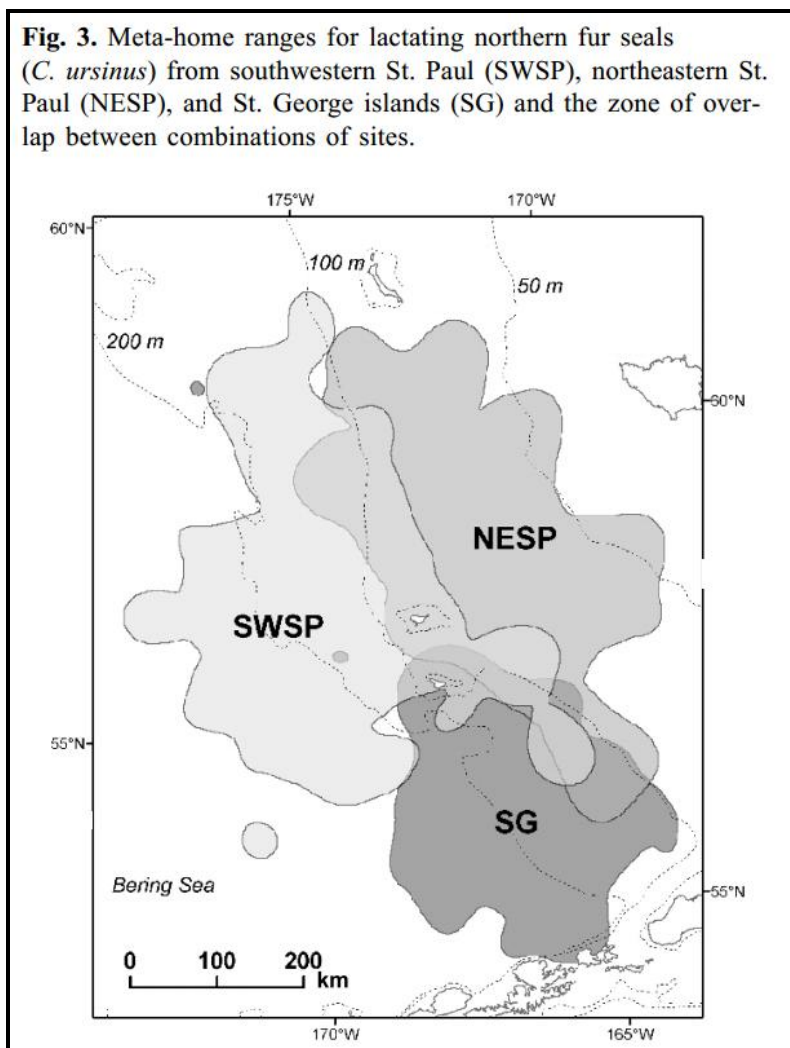


Ron Philemonoff
Chief Executive Officer

cc: Members of the NPFMC
Douglas DeMaster, Director, Alaska Fisheries Science Center

⁸ Consolidated Appropriations Act, 2004, Pub. L. No. 108-199, Div H. Section 161, 118 Stat. 3, 452 (2004) as amended by Consolidated Appropriations Act of 2005, Pub. L. No. 108-447, Div H., Title V., § 518, 118 Stat. 2809, 3267 (2005).

Lactating Pribilof Island Northern Fur Seal Ranges



(Robson, et al. "Separation of foraging habitat among breeding sites of a colonial marine predator, the northern fur seal (*Callorhinus ursinus*). Can. J. Zool. Vol. 82, 2004, p. 21.)

January 28, 2014

Mr. Eric Olson
Council Members
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: D-2 Bering Sea Fishery Ecosystem Plan, Bering Sea Canyons

Dear Chairman Olson and Council members:

We are writing to convey our support for development of a Fishery Ecosystem Plan for the Bering Sea. As a first step, we urge the Council to protect the Zhemchug and Pribilof canyons in the Bering Sea, given their important role in the ecosystem that supports our valuable fisheries. As a leading provider of commercial seafood in the US, we are an important stakeholder in US fisheries and we appreciate the opportunity to provide these comments.

The canyons are known to contain abundant and diverse corals and sponges that provide valuable habitat for commercially important fish and other marine species¹. Numerous fish and crab species depend upon Canyon terrain for spawning and nursery areas, making these habitats important for sustaining species populations. According to NOAA, commercially important species that utilize the canyons for essential fish habitat include rockfish, Pacific cod, halibut, pollock and several species of crab.

In much of the canyons, corals and sponges often provide the *only* three-dimensional habitat structure available to fish and other marine life. Unfortunately, corals and sponges are extremely vulnerable to impacts from bottom-tending fishing gear. They are long-lived and slow growing; some Alaskan corals are more than 1,000 years old. When they are ripped from ocean substrate or crushed by fishing gear they are unlikely to recover, causing a habitat deficit that is difficult if not impossible to regenerate.

Sustainable fisheries maintain the diversity, structure and function of healthy ecosystems, which depends, in part, on minimizing fishing gear interactions with essential fish habitat. NOAA has stated “reducing bycatch and protecting habitat are two of the fundamental standards that drive the management of all fisheries.”² Indeed, commercial fisheries cannot be biologically and economically sustainable in the absence of a robust and healthy ecosystem, and we depend upon NOAA and the NPFMC to ensure that fisheries in Alaska do not jeopardize the ecosystems that produce our seafood supply.

Zhemchug and Pribilof Canyons are carved into the Bering Sea shelf break, a unique ecoregion known as the Green Belt due to its extraordinary productivity. The economic and ecological importance of the Green Belt warrants a precautionary approach to management. Setting aside representative portions of the Green Belt habitat as conservation areas closed to bottom contact gear will provide all stakeholders with an insurance policy that can help preserve biodiversity as well as ensure the sustainability of fisheries and seafood supply.

The motions adopted by the Council in June 2013 were an important step towards realizing NOAA’s number one stated objective for deep-sea coral and sponge conservation and management: protect areas containing known deep-sea coral or sponge communities from impacts of bottom-tending fishing gear.³ The available data and analysis provided by NOAA and independent scientists provides the Council with sufficient guidance to act. As noted in the discussion paper on fishing

¹ Miller RJ, Hovecar J, Stone RP, Fedorov DV (2012) Structure-Forming Corals and Sponges and their Use as Fish Habitat in Bering Sea Submarine Canyons. PLoS One 7(3): e33885. doi:10.1371/journal.pone.0033885

² NOAA, Fishwatch U.S. Seafood Facts, http://www.fishwatch.gov/wild_seafood/what_is_a_fishery.htm

³ National Oceanic and Atmospheric Administration, Coral Reef Conservation Program. 2010. NOAA Strategic Plan for Deep-Sea Coral and Sponge Ecosystems: Research, Management, and International Cooperation. Silver Spring, MD: NOAA Coral Reef Conservation Program. NOAA Technical Memorandum CRCP 11. 67 pp.

activity produced by Council staff,⁴ the amount of catch occurring in the canyons is typically quite low, so the economic benefits of setting these areas aside are likely to exceed the costs.

As a seafood business that is committed to building a market for sustainable seafood, we have a strong interest in ensuring the health of ecosystems that harbor and nurture that seafood. We entrust you to make choices that will produce sustainable seafood for this and future generations. We urge you to move swiftly to protect America's Grand Canyons of the sea and ensure the long-term sustainability of the vital fisheries of the Bering Sea.

Sincerely,
Hy-Vee, Inc.

⁴ Pribilof and Zhemchug canyons: fishing activity, protection measures and process for future action. 2013. Council staff discussion paper. 56 pp.
http://www.npfmc.org/wp-content/PDFdocuments/conservation_issues/BSHC/BScanyonsDiscPaper513.pdf

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
RE: Bering Sea Fisheries Ecosystem Plan, Bering Sea Canyons, Agenda Item (D-2)

Dear Chairman Olson and NPFMC Members,

Thank you for taking the time to learn about the Bering Sea Canyons and their role in maintaining healthy oceans and fisheries.

As a Washington business, we urge you to help establish protected marine reserves in the Bering Sea through the state's participation in the North Pacific Fisheries Management Council. We understand two seated members of the Council are appointed by the Governor, and that the vice chairman is from Washington. The council is influenced by industry interests and has been a challenge to protecting fishing habitat, so we need the Governor's help. We are asking the Governor to urge the Washington state reps to support marine reserves in the canyons.

The Bering Sea provides more than half the wild seafood caught in the United States. Although Alaska's multibillion-dollar fishing industry is one of the most closely monitored in the world, there are serious causes for concern. Excessive fishing is threatening the food supply for marine mammals and birds as well as tribal communities and small-boat fishermen who depend on a healthy marine ecosystem. Fragile habitat, essential for fish and other marine life, is being destroyed by unregulated fishing gear.

Our oceans are under pressure from climate change, overfishing, habitat loss, acidification, and pollution. According to NOAA scientists, marine protected areas are being recognized increasingly as a key tool for maintaining and restoring ecosystem resilience in a changing climate.¹

We must safeguard ocean productivity today and not undermine the sea's ability to support thriving ecosystems. Seafood must be caught in ways that maintain the diversity, structure, and function of ecosystems while minimizing adverse impacts, such as destruction of habitat and the wasteful bycatch of marine life.

We want to ensure that the Bering Sea remains "America's Fish Basket" and can continue to provide the seafood products and jobs that sustain our businesses, our economy, and the broader health of our planet.

We urge you to act quickly to help establish protected marine reserves in the Bering Sea through the state's participation in the North Pacific Fisheries Management Council.

Sincerely,

Eli Penberthy and Trudy Bialic
Public Affairs
PCC Natural Markets

¹ <http://marineprotectedareas.noaa.gov/sciencestewardship/climatechangeimpacts/>

January 28, 2014

Mr. Eric Olson
Council Members
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: D-2 Bering Sea Fishery Ecosystem Plan, Bering Sea Canyons

Dear Chairman Olson and Council members:

We are writing to convey our support for development of a Fishery Ecosystem Plan for the Bering Sea. Specifically, we would like to ask the Council to protect the Zhemchug and Pribilof Canyons.

As a leading provider of commercial seafood in the US, we are an important stakeholder in US fisheries and believe that this effort can help to ensure the long-term sustainability of vital fisheries in the Bering Sea.

The Canyons are known to contain abundant and diverse corals and sponges that provide valuable habitat for commercially important fish and other marine species¹. Numerous fish and crab species depend upon Canyon terrain for spawning and nursery areas, making these habitats important for sustaining species populations. According to NOAA, commercially important species that utilize the Canyons for essential fish habitat include rockfish, Pacific cod, halibut, pollock and crab.

Corals and sponges are extremely vulnerable to impacts from bottom-tending fishing gear. They are long-lived and slow growing; some Alaskan corals are more than 1,000 years old. Setting aside portions of the Green Belt habitat as conservation areas can help preserve its long-standing biodiversity.

The motions adopted by the Council in June 2013 were an important step towards realizing NOAA's number one stated objective for deep-sea coral and sponge conservation and management: protect areas containing known deep-sea coral or sponge communities from impacts of bottom-tending fishing gear.²

As noted in the discussion paper on fishing activity produced by Council staff,³ the amount of catch occurring in the Canyons is typically quite low, so the economic benefits of setting these areas aside are likely to exceed the costs.

As a seafood business that is committed to building a market for sustainable seafood, we have a strong interest in ensuring the health of ecosystems. We ask for your support to ensure the long-term sustainability for this region of the Bering Sea.

Sincerely,

Demetri Pantazes
Group Director, Safeway Seafood

¹ Miller RJ, Hocevar J, Stone RP, Fedorov DV (2012) Structure-Forming Corals and Sponges and their Use as Fish Habitat in Bering Sea Submarine Canyons. PLoS One 7(3): e33885. doi:10.1371/journal.pone.0033885

² National Oceanic and Atmospheric Administration, Coral Reef Conservation Program. 2010. NOAA Strategic Plan for Deep-Sea Coral and Sponge Ecosystems: Research, Management, and International Cooperation. Silver Spring, MD: NOAA Coral Reef Conservation Program. NOAA Technical Memorandum CRCP 11. 67 pp.

³ Pribilof and Zhemchug canyons: fishing activity, protection measures and process for future action. 2013. Council staff discussion paper. 56 pp.

http://www.npfmc.org/wp-content/PDFdocuments/conservation_issues/BSHC/BScanyonsDiscPaper513.pdf

Eric Olson
Council Members
North Pacific Fisheries Management Council
605 W 4th Avenue, Ste #306
Anchorage, AK 99501-2252
RE: Bering Sea Canyons, Agenda

Dear Chairman Eric and NPFMC Members,

As Washington-based businesses, we all have a strong connection to the ocean, and a deep respect for the invaluable services the ocean provides. We support the growing campaign to protect the Bering Sea Canyons, the largest underwater canyons in the world.

These extraordinary canyons occur in the heart of the most productive area of the Bering Sea where the shelf plunges into depths, which were once out of reach to fisherman. Today, technology and bigger boats can reach fish even in these depths. Zhemchug and Pribilof canyons contain high concentrations of deep sea corals and sponges, forming havens for commercially important fish, crab and other marine life. We are concerned about the potential long-term effects of the Bering Sea ecosystem if we continue to destroy in minutes habitat which took decades or even hundreds of years to form.

Our oceans are under pressure from climate change, overfishing, habitat loss, acidification and pollution. According to NOAA scientists, climate change is having a profound affect on ocean ecosystems. Marine protected areas are increasingly recognized as a key tool for maintaining and restoring ecosystem resilience in a challenging climate. We must safeguard ocean productivity today; not wait until a combination of stressors undermines the ocean's ability to support thriving ecosystems. Seafood must be caught in ways that maintain the diversity, structure and function of ecosystems while minimizing adverse affects such as the destruction of essential fish habitat and the wasteful side-catch of marine life.

We all recognize the value of healthy oceans. Some of us in the business of providing Washington's well-known quality seafood to local patrons and visitors are directly invested in supporting sustainable fisheries. We want to ensure Bering Sea, "America's Fish Basket," continues to provide the seafood products and jobs which sustain our businesses, our economy, and the broader health of our planet.

We appreciate the work you do to manage our invaluable Bering Sea resources. With so much uncertainty and change to consider, it makes good sense to protect some of the most valuable parts of our "fish basket" as an insurance policy against costly miscalculations. Securing some places for scientific research and ecological recovery will give us the best chance for maintaining resilient fisheries throughout

these changing times. We urge you to act quickly to adopt protections for vulnerable coral and sponge habitats in the Bering Sea canyons.

Sincerely,



Printed Name ROBERT KOVALCHIK

Business Name N/A

Title _____

Address 5216 1ST AVE NE

SEATTLE, WA 98105



1/26/14

Mr. Eric Olson
Council Members
North Pacific Fisheries Management Council
605 West 4th Ave., Suite 306
Anchorage, Ad 99501-2252

Dear Chairman Olson and NPFMC members:

We are a fisherman-owned harvesting and direct marketing company, specializing in value-added Alaskan and Puget Sound salmon, and halibut. We are committed to sustainable harvesting practices and environmental defense of the North Pacific waters upon which we depend. Moreover, we believe that fisheries management should be driven by the best available science. Recently, we had our 2013 fish sampled for Fukushima-derived radionuclides (they had no elevated levels).

We write you to express our belief that biologically sensitive regions of the North Pacific be protected. We would like to see research and precautionary protection of areas such as the Bering Sea canyons.

The decisions of your Council affect all of us who connect the public to the food web of the North Pacific. Unsustainable practices in any North Pacific fishery eventually affect all of us who live from the resource, either through ecological carelessness or through the impact upon public perceptions of commercial harvesters as a whole.

Sincerely,

A handwritten signature in red ink, which appears to read "Peter Knutson". The signature is fluid and cursive.

Peter Knutson

Owner, Loki Fish Company

Lokifish.com

1/15/2014

Mr. Eric Olson
Council Members
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: D-2 Bering Sea Fishery Ecosystem Plan, Bering Sea Canyons

Dear Chairman Olson and Council members:

We are writing to convey our support for development of a Fishery Ecosystem Plan for the Bering Sea. As a first step, we urge the Council to protect the Zhemchug and Pribilof canyons in the Bering Sea, given their important role in the ecosystem that supports our valuable fisheries. As a leading provider of commercial seafood in the US, we are an important stakeholder in US fisheries and we appreciate the opportunity to provide these comments.

The canyons are known to contain abundant and diverse corals and sponges that provide valuable habitat for commercially important fish and other marine species¹. Numerous fish and crab species depend upon Canyon terrain for spawning and nursery areas, making these habitats important for sustaining species populations. According to NOAA, commercially important species that utilize the canyons for essential fish habitat include rockfish, Pacific cod, halibut, pollock and several species of crab.

In much of the canyons, corals and sponges often provide the *only* three-dimensional habitat structure available to fish and other marine life. Unfortunately, corals and sponges are extremely vulnerable to impacts from bottom-tending fishing gear. They are long-lived and slow growing; some Alaskan corals are more than 1,000 years old. When they are ripped from ocean substrate or crushed by fishing gear they are unlikely to recover, causing a habitat deficit that is difficult if not impossible to regenerate.

Sustainable fisheries maintain the diversity, structure and function of healthy ecosystems, which depends, in part, on minimizing fishing gear interactions with essential fish habitat. NOAA has stated "reducing bycatch and protecting habitat are two of the fundamental standards that drive the management of all fisheries."² Indeed, commercial fisheries cannot be biologically and economically sustainable in the absence of a robust and healthy ecosystem, and we depend upon NOAA and the NPFMC to ensure that fisheries in Alaska do not jeopardize the ecosystems that produce our seafood supply.

Zhemchug and Pribilof Canyons are carved into the Bering Sea shelf break, a unique ecoregion known as the Green Belt due to its extraordinary productivity. The economic and ecological importance of the Green Belt warrants a precautionary approach to management. Setting aside representative portions of the Green Belt habitat as conservation areas closed to bottom contact gear will provide all stakeholders with an insurance policy that can help preserve biodiversity as well as ensure the sustainability of fisheries and seafood supply.

The motions adopted by the Council in June 2013 were an important step towards realizing NOAA's number one stated objective for deep-sea coral and sponge conservation and management: protect areas containing known deep-sea coral or sponge communities from impacts of bottom-tending fishing gear.³ The available data and analysis provided by NOAA and independent scientists provides the Council with sufficient guidance to act. As noted in the discussion paper on fishing

¹ Miller RJ, Hocevar J, Stone RP, Fedorov DV (2012) Structure-Forming Corals and Sponges and their Use as Fish Habitat in Bering Sea Submarine Canyons. PLoS One 7(3): e33885. doi:10.1371/journal.pone.0033885

² NOAA, Fishwatch U.S. Seafood Facts, http://www.fishwatch.gov/wild_seafood/what_is_a_fishery.htm

³ National Oceanic and Atmospheric Administration, Coral Reef Conservation Program. 2010. NOAA Strategic Plan for Deep-Sea Coral and Sponge Ecosystems: Research, Management, and International Cooperation. Silver Spring, MD: NOAA Coral Reef Conservation Program. NOAA Technical Memorandum CRCP 11. 67 pp.

activity produced by Council staff,⁴ the amount of catch occurring in the canyons is typically quite low, so the economic benefits of setting these areas aside are likely to exceed the costs.

As a seafood business that is committed to building a market for sustainable seafood, we have a strong interest in ensuring the health of ecosystems that harbor and nurture that seafood. We entrust you to make choices that will produce sustainable seafood for this and future generations. We urge you to move swiftly to protect America's Grand Canyons of the sea and ensure the long-term sustainability of the vital fisheries of the Bering Sea.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Johnson", with a long horizontal flourish extending to the right.

Matt Johnson
VP Meat and Seafood
Ahold USA

⁴ Pribilof and Zhemchug canyons: fishing activity, protection measures and process for future action. 2013. Council staff discussion paper. 56 pp.

http://www.npfmc.org/wp-content/PDFdocuments/conservation_issues/BSHC/BScanyonsDiscPaper513.pdf