



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

*Akutem, Aka, False Pass, Nelson Lagoon, Nikolski, St
George*

Arctic Storm Management
Group

Bristol Bay Economic
Development Corporation

*Aleknagik, Clark's Point, Dillingham, Egegik, Ekuk,
Ekwok, King Salmon, Levelock, Manokotik, Naknek,
Pilot Point, Port Heiden, Portage Creek, South Naknek,
Togalak, 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

*Brevig Mission, Diomedes, Elm, Gambell, Golovin,
Koyuk, Nome, Saint Michael, Savoonga, Shaktoolik,
Stebbins, Teller, Unalakleet, Walrus, White Mountain*

Pacific Seafood

Pacific Seafood Processors
Association

*Alaska General Seafoods, Alyeska Seafoods, Golden
Alaska Seafoods, North Pacific Seafoods, Peter Pan
Seafoods, Phoenix Processor Limited Partnership,
Trident Seafoods, Unisa, Westward Seafoods*

United Catcher Boats

*Akutem Catcher Vessel Association
Mothership Fleet Cooperative
Northern Vicer Fleet
Peter Pan Fleet Cooperative
Unalaska Co-op
Unisea Fleet Cooperative
Westward Fleet Cooperative*

January 21, 2015

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501

RE: Agenda Item B.2

Dear Mr. Hull,

Thank you for the opportunity to comment on Agenda Item B.2. The Marine Conservation Alliance is comprised of harvesters, 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.

As you know, a proposal to create an Aleutian Islands National Marine Sanctuary was recently submitted to NOAA. We are pleased to learn that NOAA has determined the Aleutian Islands sanctuary proposal is insufficient; however we are aware of other conversations regarding a potential sanctuary designation as well as discussions concerning national monuments off Alaska. We have concerns about the process of designating both marine sanctuaries and national monuments. In particular, such a designation does not require consultation with the Council during the earliest stages of the designation process. This is particularly concerning given the degree of misinformation regarding the conservation and management of North Pacific marine resources that is contained in the Aleutian sanctuary proposal and elsewhere. Early consultation could correct erroneous claims and misinformation and assist the National Marine Sanctuary program as they consider future proposals.

The National Marine Sanctuaries Act and the Antiquities Act have several purposes, but generally allow for the conservation of areas with historic, scientific, or special national significance. The MSFCMA gives Councils significant discretion and latitude in crafting conservation measures, including "discretionary provisions" contained in section 303(b). Measures developed by this Council have conserved extensive areas of the Gulf of Alaska, Aleutian Islands, Bering Sea, and the Arctic. Measures developed by this Council are highly complementary to the goals contained in the Antiquities Act and the National Marine Sanctuaries Act.

Conservation measures in the North Pacific have been developed over several decades based on sound science and public process. An additional process for conserving and

managing marine resources may create unnecessary redundancy and may hinder the ability of this Council to continue to operate effectively. To address this concern, we ask that the Council consider writing a letter to the Office of the National Marine Sanctuaries, the National Marine Fisheries Service, and the Center for Environmental Quality requesting consultation on potential sanctuary or monument designation as a first step in such a process.

MCA believes that appropriate federal agencies will benefit from an early consultation request from the Council, as will stakeholders reliant on a transparent process.

Sincerely,

Merrick Burden
Executive Director