

October 7, 2013

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

RE: D2 – Staff Tasking

Dear Chairman Olsen, Dr. Balsiger, and Council members:

We applaud the work of the Ecosystem Committee to further the positive efforts of this Council on implementing Ecosystem-Based Management (EBM). The Ecosystem Committee Workshop in September highlighted the ongoing effort by this Council including numerous examples of Council documents that well articulate the Council's EBM goals such as the Council's draft ecosystem-based management policy written in 1997 by Dave Witherell. Committee members also noted the progress of this Council on EBM including citing the 2-million-metric-ton cap for all groundfish in the Bering Sea as an unprecedented step to protect the ecosystem.

We commend this Council for all previous actions taken to protect important habitat and further the EBM goals it has defined over the years. Of course, as noted by the Ecosystem Committee, there is still work to be done. To that end we appreciate the Council's motions in April 2012 and June 2013 on the Bering Sea Canyons to begin a process, including analyzing the best available science, for considering management measures to conserve coral and sponge essential fish habitat in the Bering Sea Canyons. These considerations represent an opportunity for the Council to address a significant gap in the Council's efforts to implement EBM since the Bering Sea slope and shelf-break are the only major habitat types lacking any permanent year-round habitat protection measures, despite their proven ecological and economic value.

We understand and appreciate the work that is underway to improve the long term understanding of this region and its essential fish habitat, including the fieldwork planned for 2014 with results expected to be reported back to the Council in June, 2015. Given the long history of requests for habitat protections for these areas that the Council has received going back more than a decade, and the action taken by the Council in 2006 to make this issue a high priority research issue your support for this research is welcomed.

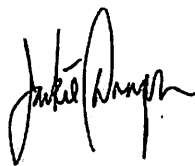
While we expect there will be additional data resolution and useful knowledge gained from this new research which may improve and verify model predictions, and the vulnerability index developed by Sigler et al at the Alaska Fisheries Science Center - in addition to useful information requested from the fishing industry on areas they avoid to save tearing up their nets - we reiterate the Council discussion point made in June: enough is known now to act now.

The Council motion and discussion on the canyons in June reflected that we know enough to move ahead with considerations for some shorter term actions that are aimed specifically at areas where we have a high degree of confidence of coral concentrations. The conservation objectives of the deep sea coral act among other legislative mandates and stated goals of the Council are ready to be applied here. It has been clearly established that coral and sponge habitat is essential fish habitat and that this type of habitat is present in Zhemchug and Pribilof Canyons.

Until this process to identify and implement management measures for the canyons is completed, important coral areas that have been identified remain vulnerable, putting at risk the long-lived species that provide essential habitat for commercially important and other species in this complex ecosystem. We encourage the Council to make needed progress at your next meeting by initiating the process to develop alternatives, considering stakeholder input, to protect this habitat while maintaining fishing opportunities that ultimately support productive fisheries and a healthy ecosystem.

Thank you for your commitment to implementing ecosystem-based management and protecting essential fish habitat in the Bering Sea Canyons.

Jackie Dragon

A handwritten signature in black ink, appearing to read "Jackie Dragon". The signature is fluid and cursive, with the first name "Jackie" written in a larger, more prominent script than the last name "Dragon".

Greenpeace