



Please Safeguard the Southern California Bight



March 29, 2018

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

RE: Agenda Item F.3 Essential Fish Habitat (EFH) and Rockfish Conservation Area (RCA)

Dear Chair Anderson and Council Members:

We, the undersigned Southern California businesses and organizations, are writing in support of protecting living seafloor in the federal waters off Southern California to support sustainable fisheries and a healthy ocean ecosystem. The Southern California Bight—extending from Point Conception, California to the U.S./Mexico border—hosts a spectacular and diverse array of seafloor habitats, including ancient, slow-growing corals, sponges, rocky reefs, seamounts, methane seeps, submerged islands, and underwater canyons. Complex seafloor geology and living structures provide areas of shelter, feeding, and breeding for dozens of commercially and recreationally important fish species, and are the foundation for a diverse deep sea ecosystem.

Scientists are still discovering new species of corals and sponges here, some of which can live to be hundreds or even thousands of years old. Vibrant, cold-water habitats like these are susceptible to disturbance from bottom trawl fishing gear, which causes the greatest impact to seafloor habitats among all fishing gears in use off the U.S. West Coast. Based on available data on fishing effort, bottom trawling off Southern California is limited to a few nearshore areas; under current regulations, however, much of the Southern California Bight seafloor is at risk of damage caused by bottom trawling. Expansion of bottom trawling in the Southern California Bight beyond the nearshore areas where it currently takes place could have significant and long-lasting negative impacts. This region remains poorly documented, making it critical to protect the living seafloor from potential fishing-induced damage now while we still have the chance to better understand this area.

We ask that you continue your track record of precautionary management by designating all un-trawled areas south of Point Conception as an Essential Fish Habitat Conservation Area closed to bottom-trawling, as embodied in the Oceana/Natural Resources Defense Council/Ocean Conservancy alternative for this area. We also urge you to ensure that your action results in a net increase in the protection of sensitive habitats throughout U.S. West Coast ocean waters for the benefit of our sustainable fisheries, ocean ecosystems and coastal communities.

Sincerely,

We the undersigned

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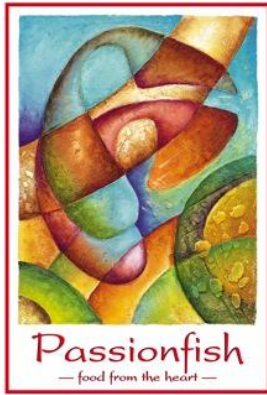
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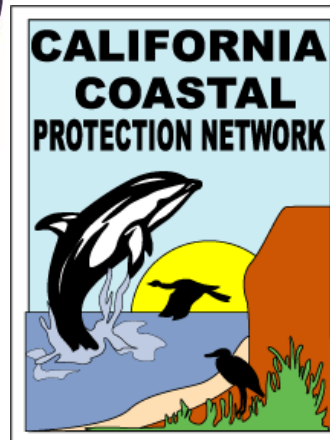
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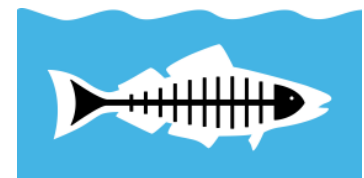
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**GREATER
FARALLONES
ASSOCIATION**



**SAVE OUR
SHORES**



Heal the Bay

March 29, 2018

Mr. Phil Anderson, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: Agenda Item F.3 EFH and RCA Amendment 28- Final Action

Dear Chair Anderson and Council members:

Thank you for your commitment to protecting Essential Fish Habitat (EFH)—including coral gardens, sponge beds, rocky reefs, and underwater canyons—off the U.S. West Coast from the adverse effects of bottom trawling. Protecting EFH is necessary to maintain and increase groundfish populations, support non-commercial marine life, and drive healthy coastal communities. We, the undersigned organizations support Alternative 1b, which would yield the greatest benefit for continued productive groundfish fisheries and advance a precautionary approach to protecting fragile and diverse seafloor habitats. We also support Alternative 3a to protect deep water habitat within the Exclusive Economic Zone (EEZ).

The negative effects of bottom trawling are well documented in scientific literature. Bottom trawls can topple, crush, and damage slow-growing corals and sponges which provide shelter, nursery and feeding grounds for commercially important rockfish, lingcod, sablefish, flatfishes, and others. This biogenic habitat is critical to a healthy and productive ocean ecosystem and sustainable West Coast fisheries. In particular, we support the protections in Alternative 1b that would prevent expansion of bottom trawling in the Southern California Bight—waters stretching from Point Conception to the U.S./Mexico border— until the area can be further researched, protecting pristine seafloor habitats that host high numbers of important corals and sponges. In addition, Alternative 1b protects a network of newly discovered bamboo coral forests, Christmas tree corals, sponge beds, methane seeps, and rocky reefs at important areas like Heceta Bank, Mendocino Ridge, Southern Oregon, and within California's National Marine Sanctuaries.

We urge the Council to adopt a precautionary approach not only regarding the designation of new EFH conservation areas, but also when considering proposed openings of existing EFH conservation areas and Rockfish Conservation Areas. Re-opening currently protected areas of the seafloor to bottom trawl fishing should be dependent upon new scientific data showing minimal impacts to EFH. Alternative 1b incorporates this precautionary approach, while minimizing any potential displaced bottom trawl fishing from current fishing grounds based on available recent fishing effort data provided by the National Marine Fisheries Service. We also support the Council's preliminary preferred Alternative 3a, to protect all waters deeper than 3,500 meters from bottom trawling in the Exclusive Economic Zone (EEZ).

Given the current opportunity to make substantial conservation gains in protecting EFH to the benefit of groundfish fisheries while also increasing overall fishing opportunities, we support Council action to select Alternative 1b as a final preferred alternative along with Alternative 3a to close deep waters in the EEZ.

Sincerely,

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