



Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384
Phone 503-820-2280 | Toll free 866-806-7204 | Fax 503-820-2299 | www.pcouncil.org
Philip Anderson, Chair | Charles A. Tracy, Executive Director

March 9, 2018

The Honorable Ryan Zinke, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Ms. Kelly Hammerle
Chief, National Oil and Gas Leasing Program
Development and Coordination Branch
Leasing Division, Office of Strategic Resources
Bureau of Ocean Energy Management
45600 Woodland Road, Mailstop VAM-LD
Sterling, VA 20166

Dear Secretary Zinke and Ms. Hammerle:

The Pacific Fishery Management Council (Pacific Council) is strongly opposed to the inclusion of additional planning areas for offshore oil and gas leasing off the coasts of Washington, Oregon, and California in the 2019-2024 Draft Program Plan. We request that the West Coast be removed from further consideration of Outer Continental Shelf (OCS) lease development as the Bureau of Ocean Energy Management (BOEM) plans for oil and gas leasing for the 2019-2024 period. We believe the uncertain and limited benefits that may accrue from additional OCS oil and gas leases do not justify the risk to our vital fishery resources and the habitats upon which they depend. Maintaining and increasing seafood harvests and processing across the broad spectrum of interests through sustainable fisheries management is key to our nation's food security.

The Pacific Council is charged with sustainably managing our West Coast fisheries and the habitats they depend on. The Council is one of eight Regional Fishery Management Councils established by the Magnuson-Stevens Fishery Conservation and Management Act of 1976 (MSA), and recommend management actions for Federal fisheries off Washington, Oregon, and California. The Council is required to achieve optimum yield for our public trust marine resources. Optimizing the yield of our nation's fisheries requires safeguarding these resources, the habitats on which they depend, and the fishing communities that rely on their harvest. The MSA also authorizes the Councils to comment on any Federal or state activities that may affect the habitat, including essential fish habitat, of a fishery resource that is under the Councils' authority.

The Federal government has trust responsibility to protect the fishing rights of Indian tribes, for whom fish and other seafood are an invaluable cultural resource while providing economic

opportunity and physical sustenance. Energy development poses significant risks to tribal fisheries and is inconsistent with this Federal mandate.

In addition, commercial fishing forms the economic base for many West Coast coastal fishing communities. In many such communities, there are few opportunities to diversify if fishing declines.

Fishing is a sizeable part of the U.S. economy, a fact that is not accurately reported in the Draft Program Plan. In 2016, U.S. commercial fishermen landed 9.6 billion pounds of fishery products valued at \$5.3 billion. Most of this harvest is used for human food and serves to reduce the U.S.'s \$7 billion trade deficit in seafood. Recreational fishing is also a major economic driver in coastal regions, with 63 million recreational fishing trips taken by 9.6 million anglers in U.S. coastal and offshore waters in 2016, sustaining over 18,800 jobs and approximately \$2.5 billion in sales. Additionally, healthy marine ecosystems allowed U.S. producers to generate \$360 million dollars in marine aquaculture products in 2016, including species such as oysters, clams, and salmon. The commercial and recreational industries support about one million jobs, contribute close to \$60 billion to the economy, and provide access to these public resources for all of our citizens.

We urge BOEM to reach out to affected commercial, recreational, and subsistence users, who are eager to share their knowledge of the marine environment. We are prepared to work closely with BOEM to ensure that any decisions are based on a complete understanding of impacts on the commercial and recreational fishing industries. The Regional Councils and our partners at NOAA Fisheries can assist BOEM in characterizing fisheries uses of the OCS. We are familiar with the spatial distribution of fishing activity, methods of harvest, the value of commercial, recreational, and subsistence landings, and impacts on fishing communities. State agencies, tribal governments, and interstate marine fisheries commissions are also key sources of information.

In addition, coordinating your outreach efforts with the Regional Fishery Management Councils will allow you to benefit from our substantial experience developing collaborative management approaches with fishery stakeholders.

Again, note that the Pacific Council is strongly opposed to the inclusion of additional planning areas off the coasts of Washington, Oregon, and California in the 2019-2024 Draft Program Plan, and we request that the West Coast be removed from further consideration of OCS lease development.

Thank you for your consideration.

Sincerely,



Philip Anderson
Council Chair

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