

**ALASKA LONGLINE FISHERMEN'S ASSOCIATION
CAPE COD COMMERCIAL HOOK FISHERMEN'S ASSOCIATION
INSTITUTE FOR FISHERIES RESOURCES
MARYLAND WATERMEN'S ASSOCIATION
MONROE COUNTY FISHERMEN'S ASSOCIATION
MONTEREY FISHERMEN'S MARKETING ASSOCIATION
PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS**

15 June 2001

Dr. William Hogarth
NOAA Acting Assistant Administrator
for Fisheries (DOC)
National Marine Fisheries Service
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Silver Spring, MD 20910

Dr. Daniel Basta
Chief, Office of National
Marine Sanctuaries (DOC)
National Ocean Service, NOAA
1305 East-West Highway
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Dear Drs. Hogarth and Basta:

In response to an invitation from you, Dr. Basta, several representatives from the commercial fishing industry joined sanctuary personnel and a fisheries manager of the National Marine Fisheries Service (NMFS) recently at a meeting in Inverness, California to discuss fishing within national marine sanctuaries, the use of marine protected areas (MPAs) within the sanctuaries, and the use of MPAs within the larger context of general fisheries management. Most industry representatives invited had been or were currently involved with sanctuaries in their respective regions, and recognize the potential value in considering sanctuaries and/or in developing MPAs within those sanctuaries. We should add, that our organizations primarily represent "family fishing" operators and all of our organizations are dedicated to the long-term health of our fishery resources and sustainable fisheries.

During this meeting, we, the commercial fishing representatives, discussed both current and past efforts in the use of sanctuaries and MPAs around the country. Through this dialogue several common concerns were voiced: 1) we are seeing a shift away from one of the fundamental goals in establishing sanctuaries, which is the sustaining of marine cultures and communities and this shift is leading to uncertainty regarding the goals of both sanctuaries and MPAs; 2) we find there is confusion regarding the regulatory authority both over sanctuaries and MPAs; 3) we see inconsistency and confusion in the terminologies used in discussing sanctuaries and MPAs; and 4) we are experiencing unnecessarily disorganized processes surrounding the establishment of both sanctuaries and MPAs.

We believe the factors listed above undermine our own industry goals of building healthy marine systems which in turn foster sustainable fisheries and sustainable fishing communities for both commercial and recreational users. We can see there is an immediate need to clarify how the tools of sanctuaries and MPAs are utilized in the larger scheme of fisheries management. We also recognize that this is a unique opportunity to build nation-wide consistency in our evaluation of these tools. We want to consider approaches that will aid all participants - commercial,

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recreational, environmental or governmental - as we each consider the use of sanctuaries and MPAs throughout our nation's waters.

To address the concerns we have raised, we respectfully recommend that you Dr. Basta and you Dr. Hogarth, as the heads respectively of the Office of National Marine Sanctuaries and the National Marine Fisheries Service, work together to draft operational guidelines for evaluating the use of MPAs. It is our hope that these guidelines will provide a framework for considering MPAs both within sanctuaries and also in considering MPAs in marine systems not under sanctuary jurisdiction. Such guidelines would help strengthen previously established goals for existing sanctuaries, and at the same time they would promote a more consistent and effective discussion of MPAs in general.

In the developing of these guidelines, we recommend that at a minimum, the following elements be included:

Statement of Purpose and Objectives:

- . In considering an MPA, participants must clearly define the purpose and objective from the beginning of the process.
- . The Purpose and Objectives need to include the goals of 1) healthy marine systems, 2) healthy fisheries, and 3) healthy fishing communities.

Definition of Terms:

- . MPAs are a tool that can be set up in a limitless variety of ways. It is important to recognize that any number of multiple uses can either be prohibited or utilized within the boundaries of an MPA.
- . The definitions developed by the South Atlantic Council, for example, could be a good starting point for establishing a set of agreed-upon terms to be used nationally within MPA discussions and by the National Marine Sanctuary office, NMFS and the Regional Fishery Management Councils.

Protocols:

- . Identification of key participants:
 - . At a minimum, participants in the consideration of an MPA must include local resource managers and local communities, especially those who harvest commercially or recreationally from the region under consideration.
- . Consensus:
 - . The goals, objectives and process in considering the MPA must be determined through consensus by all participants.
- . Baseline Data Requirements:
 - . The participants need to agree on baseline/foundational data requirements (i.e., stock assessment needs, baseline water quality data) which must be gathered before decisions are made

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- . Baseline data requirements must include a codification of local/indigenous knowledge and experience
- . Data will be accessible to all participants
- . Socioeconomic Impacts and Benefits:
 - . The socioeconomic impacts and benefits of the proposed MPA will be considered.
 - . The methodologies for determining these impacts and benefits will be agreed upon through consensus of the participants.
- . Monitoring and Research:
 - . The proposal for the MPA will include the establishment of baseline performance standards to assess whether the goals and objectives are being met.
 - . There will be monitoring of the MPA to evaluate the effectiveness of the protocols in place.
 - . The monitoring and performance standards will include quantitative and qualitative measures of success.
- . Review and Evaluation:
 - . MPAs are an experimental tool in fisheries management. Because we are still determining how and when MPAs are useful or effective, there needs to be periodic review of the management of the MPA to allow for revision and/or augmentation of the current process and structure.
- . Enforcement:
 - . Establish enforcement's needs, responsibilities and costs.
- . Education and Outreach
 - . Provide information and outreach support to educate local communities regarding potential benefits of MPAs and sanctuaries.
 - . Provide information and outreach support to educate local communities throughout the process of evaluating MPAs and sanctuaries.
 - . After the establishment of the sanctuary and/or MPA, provide continued information and outreach regarding the goals and benefits of the sanctuary and/or MPA.

Funding

All the elements listed above need to have identified funding sources with an actual commitment of funding in place to meet the requirements each.

We feel continued discussions are essential toward building the communication and trust necessary to create effective solutions for the issues before us. We appreciate this opportunity to evaluate current sanctuary and MPA processes around the country. Recent successes in utilizing sanctuaries and MPAs (the Tortuga MPA in Florida and the Alliance Network in Monterey Bay)

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demonstrate that divergent interests can work together for common goals. We hope to carry this dialogue forward both within our own industry and also with other groups affected by the health

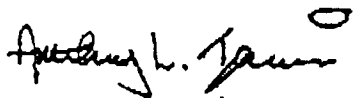
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of marine systems, and recommend an additional meeting this coming Fall. We hope this meeting will include not only commercial representatives, but also participants from the recreational fishing community, environmental community and others as deemed appropriate.

We also recognize that MPAs are just one tool in the struggle for building our marine systems and coastal communities. Comprehensive management using sanctuaries, MPAs or any marine jurisdictional tool must also consider a host of interrelated factors, including, but not limited to, sedimentation, invasive species, coastal development and habitat restoration.

Thank you both for your consideration of these recommendations. We look forward to your questions, comments and most certainly, your collaboration.

Sincerely,



Tony Iarocci
 Monroe County Fishermen's Association



Paul Parker
 Cape Cod Commercial Hook
 Fishermen's Association



Pietro Parravano
 Pacific Coast Federation of Fishermen's
 Associations



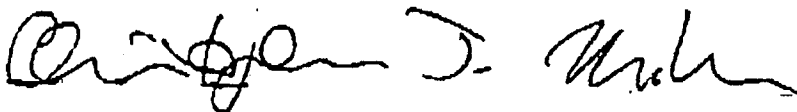
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