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U.S. Commission on Ocean Policy  
1120 20<sup>th</sup> Street NW  
Suite 200 North  
Washington, D.C. 20036

RE: Response to September 30, 2002 Request For Additional Information

Dear Commissioners:

We would like to thank the U.S. Commission on Ocean Policy for their work and providing us the opportunity to comment on the pressing need for increased research in the North Pacific region. As you know, we will only be able to make sound management decisions, protect our fisheries, or use our resources sustainably with sound scientific research. The North Pacific and Arctic marine ecosystems are truly world-renowned hotspots of productivity and biodiversity. The unique combination of ocean currents, weather patterns, bathymetric features, rich nutrients, and complex benthic habitat create unparalleled ecosystems important to all Alaskans.

This diverse and unique system produces some of the world's most abundant fisheries, which are vitally important to subsistence, recreational, commercial fisheries, local communities and the Alaska economy. For the same reasons, the North Pacific attracts millions of seabirds and marine mammals from all over the world every year. However, we know little about how these processes interact or about the consequences of human action on these processes.

The goals of resource management should be maximum sustainable utilization of natural resources while protecting habitat and fragile ecological relationships in the Arctic and the North Pacific. Due to our limited understanding of these ecosystems, we do not yet know how to maintain a balanced approach to resource use that accomplishes both of these goals. Therefore, management tends to fall too far one way or the other causing major resource use conflicts. Rather than working together to find effective solutions to resource challenges, the various interests wind up arguing over the definition and application of the precautionary approach, given the lack of information about how the ecosystem works. It is only with better science that we can more fully understand the fragile relationships in the North Pacific ecosystem to make better decisions about the prudent harvest of biomass. If we are to accomplish the goal of protecting and restoring our ocean while maintaining healthy fisheries, we must have a commitment to research.

We believe it is imperative to have a comprehensive, coordinated research program. This research program would be a collaborative effort of the University of Alaska, the National Marine Fisheries Service, and the State of Alaska. Along with other research institutions, this coordinated research should include funding for research on marine mammals, seabirds, commercial and forage fish, biological and physical oceanography, benthic ecology, and the ecological processes that link these together. This research should be based on diverse data sources including local and traditional ecological knowledge. Furthermore, once we do develop extensive datasets about these topics, the research is only valuable through a synthesis of the information that actually informs resource managers, decision-makers, and the public. Resource managers must ensure that appropriate scientific information is available to stakeholders involved in dialogue about how to integrate the scientific information into our management plans for the ocean.

An example of research emphasis is research on deep-sea corals, sponges, and other sensitive benthic habitat. As you are aware, the protection of Essential Fish Habitat (EFH) is a major concern in the conservation community and for all users of the resource. The North Pacific Fishery Management Council and NOAA Fisheries have designated corals and sponges as Habitat Areas of Particular Concern (HAPC), which makes these areas priority areas for conservation and research within EFH. Furthermore, recent scientific studies have shown that some of these invertebrate animals grow slowly for hundreds of years and provide complex, biogenic structure on the seafloor. This provides essential habitat for several associated species including several species of rockfish, Atka mackerel, walleye pollock, Pacific cod, brown king crab, shrimp, Greenland turbot, greenling, other flatfish, and many other important marine species.

Specifically, this approach, which would be applicable in similar important marine biological areas, should include a 3- to 5-year comprehensive research project to determine how best to continue fishing opportunities while protecting the health of the marine ecosystem by:

- Mapping the geographic distribution of corals, sponges, and other sensitive essential fish habitat in the Aleutian Islands region and other regions of high abundance and diversity of corals and sponges;
- Further studying the ecological functions of important benthic habitats like coral and sponge gardens, particularly the relationship between these habitats and the productivity of commercial and other marine species;
- Measuring the impacts of all bottom tending fishing gear types including longlines, pots, pelagic trawls, and bottom trawls on corals, sponges, and other sensitive benthic habitat;

- Identifying specific areas where respective gear types may be allowed with minimal damage to Essential Fish Habitat;
- Submitting to the North Pacific Fishery Management Council and the Alaska Board of Fisheries an annual progress report regarding status and results of the research;
- Require the National Marine Fisheries Service to complete Annual Habitat Assessment Reports (similar to Stock Assessment and Fishery Evaluation reports) that evaluate the effectiveness of fish habitat management measures over time;
- Require Vessel Monitoring Systems and increased observer coverage with the goal of 100% of all catch and bycatch observed, counted, and reported for all vessels with potential impacts to corals, sponges, and other sensitive benthic habitat. Observers would identify corals and sponges to the lowest practicable taxonomic level.

This research program would answer the key questions that are currently limiting the ability of decision makers to accomplish the shared goals of protecting fish habitat while maintaining fishing opportunities. In our work with fishermen and other stakeholders on this issue, the greatest barrier to achieving meaningful solutions is the lack of pertinent information to guide the process. The North Pacific region is truly blessed with some of the most magnificent seafloor and productive fisheries in the world. The only way to achieve sustainable resource use is through sound science, good unbiased management, and deliberate public process. Solid research combined with work groups comprised of various stakeholders is the long-term answer to effective resource management.

In addition, it is important to note the importance of a state, federal, and tribal collaborative research effort to monitor the presence and effects of pollutants. The contaminants of greatest concern are persistent organic pollutants (POPs). As you know, these include DDT, PCBs, and dioxins. The Arctic is at risk from these harmful contaminants. In Alaska, they have been found in water, air, wildlife, and humans. We must pass the POPs legislation pending in Congress and implement research and monitoring of POPs in the Arctic.

Again, thank you for the opportunity to participate and comment in the U.S. Commission on Ocean Policy project and report.

Sincerely,

Jim Ayers  
Director, North Pacific Regional Office  
Oceana