MR. PRESIDENT, WE OPPOSE THE DESIGNATION OF CALIFORNIA OFFSHORE MONUMENTS THAT PROHIBIT FISHING.

We agree that fishery management in the US EEZ is best implemented under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The MSA has been heralded worldwide for its success in conserving fishery resources.

We oppose the designation of California offshore marine monuments that prohibit fishing under the Antiquities Act because monument status is irreversible, and the Antiquities Act process involves no public peer-reviewed scientific analysis, no NEPA analysis, no public involvement or outreach to parties most impacted — no transparency.
July 6, 2016

The President
The White House
Washington, DC 20500

Dear President Obama:

We are writing to express our opposition to the recent proposal to declare virtually all offshore seamounts, ridges and banks off the coast of California as monuments under the Antiquities Act, and permanently close these areas to commercial fishing. The document “The Case for Protecting California’s Seamounts, Ridges and Banks” was drafted and advanced behind closed doors with no public peer-reviewed scientific analysis, no NEPA analysis, and virtually no public engagement.

We discovered this secret effort after pursuing rumors, and found the justification for this proposed action is filled with sensational, inaccurate statements and omissions. The economic analysis for the proposed closures grossly understates the importance and value of the identified seamounts, ridges and banks to fisheries and fishing communities. Beyond simple ex-vessel value is the opportunity cost of losing these productive fishing grounds forever.

All the seamounts and banks in the proposal are important for fisheries. Fisheries provide healthy food for people, and our fisheries are a well-managed renewable resource. Tanner and Cortes Banks, in southern California, are critically important for many fisheries: tunas, swordfish, rockfish, spiny lobster, sea urchins, white seabass and coastal pelagic species including mackerels, bonito and market squid. In northern California, Gorda and Mendocino Ridges provide important albacore tuna fishing opportunities to portfolio fishermen who, for the past few seasons, have been unable to rely on Chinook salmon and Dungeness crab fisheries. Moreover, these areas are essential for the Commercial Passenger Fishing Vessel (CPFV) fleet, which are licensed commercial fishing boats. Closure of these important areas to commercial fishing would also deny access to the CPFV fleet and would cause disastrous economic impacts to fishermen, seafood processors and allied businesses, fishing communities and the West Coast fishing economy.

California has the most strictly regulated fisheries in the world. Precautionary policies for protecting resources in federal waters exist under the federal Magnuson-Stevens Fishery Conservation and Management Act (MSA), and many other bipartisan laws, such as the Marine Mammal Protection Act and Endangered Species Act, which require science-based analysis conducted in a fully public and transparent process.

In contrast, the Antiquities Act is a unilateral action. This proposal was developed with no outreach to fisheries managers in NOAA, NMFS, the Pacific Fishery Management Council, or fishermen. Further, the use of the Antiquities Act to designate marine protected areas as monuments in open ocean waters is inconsistent with the nation’s ocean policies set forth in the panoply of Federal laws in the US – even this Administration’s own National Ocean Policy Plan, which promises “Robust stakeholder engagement and public participation.” Adopting the proposed monuments using a land-oriented Presidential order goes against the bipartisan legacy of the nation’s ocean environment laws, programs and policies, whose hallmark is transparency, and which have a long track record of working successfully to protect marine resources.

We ask you to stop the creation of these California offshore monuments under the Antiquities Act because monument status is irreversible, and the Antiquities Act process involves no science, no public involvement nor outreach to the parties who will be most affected by this unilateral action – no transparency.

We ask you to inform the White House Council on Environmental Quality as well as the Secretaries of Commerce and Interior that you oppose the creation of these monuments and support the resolution of the Council Coordination Committee, signed by all eight regional Fishery Management Councils, that fishery management in the US EEZ should continue to be implemented under the MSA.

Thank you for your attention.

Respectfully,

/s/
Tom Trumper
President
Pacific Rim Seafood

Don Brockman
President
Davey's Locker Sportfishing & Whale Watching

Mike Thompson
President
Newport Landing Sportfishing

Shad Catarius
President
San Diego Oceans Foundation

David Goldenberg
Executive Director
California Sea Urchin Commission

Milo Milkotin
Executive Director
California Sportfishing League

Mike McCorkle
President
Southern CA Trawlers Association

Jeremiah & Trudy O'Brien
Morro Bay Commercial Fishermen's Association

Mike Conroy, Board of Directors
California Lobster & Trap Fishermen's Association

Jonathan Gonzalez
President
Ventura County Commercial Fishermen's Association

Chris Voss
President
Commercial Fishermen of Santa Barbara

Tom Hafer
President
Morro Bay Commercial Fishermen's Organization

Larry Collins
President
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Mark Helvey
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Mike Ricketts
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Monterey Commercial Fishermen's Association

Pete Leipzig
Executive Director
Fishermen's Marketing Association

David Schulken
Apex Wild Seafoods
San Diego

Nancy Fitzpatrick
Executive Director
Oregon Salmon Commission

William Fakner
President
Salmon Trollers Marketing Association

Lorne Edwards
President
Fishermen's Marketing Assoc. of Bodega Bay

Bob Vanasse
Executive Director
National Coalition of Fishing Communities