



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, Maryland 20910

THE DIRECTOR

SEP - 9 2002

Mr. Jim Ayers
Oceana
Director, North Pacific
175 South Franklin Street
Juneau, Alaska 99801

Dear Mr. Ayers:

Thank you for your letter regarding the coral reef-like structures that our National Marine Fisheries Service (NOAA Fisheries) scientists, Jon Heifetz and Bob Stone, found in the course of their coral survey of the Aleutian Islands Archipelago. I share your enthusiasm for this finding and your concern for protecting these structures.

In our view, the first task is to get a better understanding of the distribution and extent of these coral structures. Out of 31 sites surveyed by submersible, 5 had the coral garden type habitat. We now know that these types of habitats exist, but we can say little about exactly how many there are, and where they are, until we conduct a more comprehensive survey. The observed structures are small in extent and their location was not predictable based on bathymetry, oceanography, or our limited knowledge of local geography. We currently are exploring ways to provide increased funding for research next summer and following years to extend the geographic and bathymetric scope of our surveys so that we may better map the coral resources of the Aleutians.

In terms of your specific request, you suggest that all current conservation closures be maintained in the Aleutian Islands area. One of the sites discovered is already closed to trawling for Atka mackerel, Pacific cod or pollock, as it falls within the 10-mile zone around a Steller sea lion rookery. The question of whether the Aleutian Island area should be open to directed fishing for pollock outside Steller sea lion critical habitat (20 miles) will be considered by the North Pacific Fishery Management Council (Council) at its October meeting. Otherwise, no changes are being contemplated at this time by NOAA Fisheries. However, we also are exploring the possibility of issuing mariners' advisories, combined with a public education effort, to forestall fishing on these concentrations of corals as we discover them. With respect to your recommendations pertaining to observer coverage and vessel monitoring, all groundfish vessels 125 feet or more must carry an observer at all times, vessels between 60 and 125 feet must carry an observer 30 percent of the time, and all Atka mackerel vessels must carry two observers. A vessel monitoring system is currently required on all vessels fishing for Atka mackerel, cod, and pollock.

We interpret your concept of a special management area to be similar to a marine protected area (MPA). MPAs are being evaluated at the policy level in the programmatic supplemental



environmental impact statement (EIS) being prepared for the Alaska groundfish fishery. MPAs are also being considered at the regulatory action level, in the essential fish habitat (EFH) EIS, which is currently being developed by the agency in consultation with the Council.

The EFH EIS will include a thorough examination of the impact of different types of fishing gear on habitat, and options for mitigation of these impacts, including the possibility of establishing MPAs. Corals, sponges, and other living substrata in waters off Alaska already are classified by NOAA Fisheries as Habitat Areas of Particular Concern deserving of special protection because of their importance as habitat and their vulnerability to human impacts. We encourage your input as we develop this EIS. The Council's next EFH committee meeting is in Kodiak, September 16-18, 2002.

We look forward to your involvement in the process of best determining how to study and protect these impressive resources.

Sincerely,



William T. Hogarth, Ph.D.
Assistant Administrator
for Fisheries