



175 SOUTH FRANKLIN STREET, SUITE 418 JUNEAU, ALASKA 99801 907.586.4050 WWW.OCEANA.ORG

March 15, 2006

Mr. Art Nelson, Chair
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 25526
Juneau, AK 99802-5526

Mr. McKie Campbell, Commissioner
Alaska Department of Fish and Game
1255 West 8th Street
P.O. Box 115525
Juneau, AK 99811-5525

Art
McKie
Dear Chairman Nelson and Commissioner Campbell:

We request you take action to protect the coral gardens and other essential fish habitat of the Aleutians under 05.AAC 96.625. More than a year ago, the North Pacific Fishery Management Council, in a motion led by the State of Alaska, voted unanimously to protect essential fish habitat in the Aleutians area from destructive bottom trawling and to fully protect the coral gardens of the Aleutians from all commercial bottom contact. We are incredulous that today's opening of the Aleutian Islands state waters Pacific cod fishery leaves open the interest and ability to use destructive fishing practices in areas known and designated as having coral gardens and other essential fish habitat. Despite this knowledge, neither the State of Alaska nor the National Oceanic and Atmospheric Administration (NOAA) has taken action to protect these valuable areas. We strongly encourage you to take immediate emergency action to protect deep sea corals in the state waters of the Aleutian Islands.

Deep sea corals and sponges provide protection, spawning areas, feeding grounds and nurseries for fish and shellfish. For example, recent research has documented the importance of coral and sponge habitat to juvenile rockfish¹. Living seafloor habitat provides immediate and long-term benefits to our ocean ecosystems. According to the National Academy of Sciences, bottom trawling is the most destructive form of fishing on living seafloor habitat. One pass of a bottom trawl can destroy this valuable habitat that can take hundreds of years to form. Without these diverse colonial animals of the deep sea, a vital component of the ecosystem and the fisheries it supports would be lost.

The North Pacific Fishery Management Council (NPFMC) and the State have recognized the importance of deep sea corals and taken precedent setting precautionary action to protect them. In addition to fully protecting the coral gardens of the Aleutians, the Council also voted to



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protect other essential fish habitat from bottom trawling. The opening of the state waters Aleutian Islands Pacific cod fishery could inadvertently undermine the protections determined necessary for a healthy Aleutian Islands ocean ecosystem.

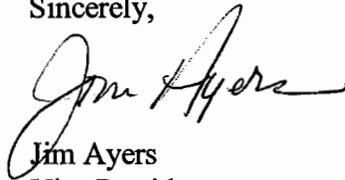
It is important to note that it is our understanding that the Board's intention was to enact parallel closure regulations with the federal government. However, due to the time delay in federal final action of protective closures, the state parallel action will not actually be triggered until as late as August. We believe that trigger is too late.

Attached please find a detailed list of coordinates for the designated coral garden locations west of 170° W longitude that need immediate protection from destructive fishing practices. These coral gardens and other essential fish habitat designated by the NPFMC to be protected from destructive bottom trawling can be found at:
http://www.fakr.noaa.gov/npfmc/current_issues/HAPC/HAPCmaps205.pdf.

The Council's action was designed to protect essential fish habitat while maintaining vibrant fisheries. The closure of these areas, while providing critical protection, will not disrupt the Pacific cod fishery, as ample area would remain open for fishing. This is consistent with both public testimony and the fishermen proposers' intent for the state waters opening.

Please take immediate emergency action to fulfill the State and NPFMC intent to close the coral gardens to all bottom contact gear and to close other essential fish habitat areas to bottom trawling.

Sincerely,



Jim Ayers
Vice President

Enclosure

cc: Denby Lloyd, Commercial Fisheries Director, ADF&G
Jim McCullough, Regional Supervisor, ADF&G

¹ Rooper, C. N., Boldt, J. L. 2005. Distribution of juvenile Pacific ocean perch *Sebastes alutus* in the Aleutian Islands in relation to benthic habitat. Alaska Fishery Research Bulletin 11:102-112.

CORAL GARDENS OF THE ALEUTIANS

Table of coordinates delineating the boundaries of coral gardens along the Aleutian Islands
 (* indicates a point on shore).

| Coral Garden Name | Longitude | Latitude |
|---------------------|-------------------|-------------------|
| Adak Canyon | 177° 3' 0.00" W | 51° 29' 100.00" N |
| | 177° 3' 0.00" W | 51° 39' 0.00" N |
| | 177° 0' 0.00" W | 51° 39' 0.00" N |
| | 177° 0' 0.00" W | 51° 29' 100.00" N |
| | 177° 3' 0.00" W | 51° 29' 100.00" N |
| Ulak Island | 178° 58' 57.01" W | 51° 22' 16.73" N |
| | 179° 6' 0.00" W | 51° 22' 16.76" N |
| | 179° 6' 0.21" W | 51° 25' 41.41" N |
| | 178° 59' 0.06" W | 51° 25' 50.70" N |
| | 178° 58' 57.01" W | 51° 22' 16.73" N |
| Cape Moffet | 176° 48' 35.42" W | 51° 55' 41.40" N* |
| | 176° 52' 59.84" W | 51° 55' 41.41" N |
| | 176° 52' 59.73" W | 52° 0' 5.72" N |
| | 176° 46' 38.73" W | 52° 0' 6.38" N |
| | 176° 46' 31.17" W | 51° 57' 57.36" N* |
| Great Sitkin | 176° 12' 26.49" W | 52° 4' 41.47" N* |
| | 176° 12' 26.51" W | 52° 6' 0.01" N |
| | 176° 12' 26.55" W | 52° 9' 33.74" N |
| | 176° 6' 8.53" W | 52° 9' 33.40" N |
| | 176° 6' 7.26" W | 52° 6' 35.12" N* |
| Bobrof Island | 177° 29' 6.72" W | 51° 51' 39.10" N |
| | 177° 29' 6.59" W | 51° 57' 21.31" N |
| | 177° 19' 56.11" W | 51° 57' 21.10" N |
| | 177° 19' 55.85" W | 51° 51' 42.49" N |
| | 177° 29' 6.72" W | 51° 51' 39.10" N |
| Semisopchnoi Island | 179° 46' 33.27" E | 51° 48' 50.31" N |
| | 179° 46' 33.13" E | 51° 53' 6.17" N |
| | 179° 53' 6.72" E | 51° 53' 5.87" N |
| | 179° 53' 6.81" E | 51° 48' 53.20" N |
| | 179° 46' 33.27" E | 51° 48' 50.31" N |