

Dr. James W. Balsiger
Acting Director
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Re: Preserve the role of NEPA in evaluating the ecosystem impacts of fishing

Dear Dr. Balsiger:

The reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) directed the National Marine Fisheries Service (NMFS) to revise and update its procedures for compliance with the National Environmental Policy Act (NEPA). We are writing to ask that, as you undertake these revisions, you preserve and strengthen the role of NEPA in ensuring that any adverse impacts of fishing on marine ecosystems are evaluated and minimized.

NEPA requires that a thorough environmental review precede any significant activities the federal government may permit in America's oceans. This will help public officials make decisions that are based on an understanding of the environmental consequences. The review should include an analysis of a full suite of alternatives to the proposed action. This will help ensure that the broader impacts of the proposed action on marine ecosystems are examined and minimized.

For too long, ocean fisheries management in this country has focused on single-species impacts. Such an approach fails to consider the wider impacts of fishing on non-target species, important habitats and the prey of other species. A properly done NEPA analysis will evaluate these impacts and provide managers with the information necessary to choose management alternatives that minimize them.

As scientists, we recognize the critical need to move beyond single-species fisheries management and toward ecosystem-based fisheries management. Preserving and strengthening the application of NEPA to MSA fishery management actions is a critical first step toward that goal. Thank you for considering our comments.

Daniel Abel, Ph.D.
Coastal Carolina University
South Carolina

Malcolm Hill, Ph.D.
University of Richmond
Virginia

Robert Angus, Ph.D.
University of Alabama at Birmingham

Mark Hixon, Ph.D.
Oregon State University

Stephen A. Arnott, Ph.D.
Marine Science Research Center, Stony Brook
University
New York

Malcolm Hunter, Ph.D.
University of Maine

Peter Auster, Ph.D.
University of Connecticut

David W. Inouye, Ph.D.
University of Maryland

James Barry, Ph.D.
Monterey Bay Aquarium Research Institute
California

Pete Jumars, Ph.D.
School of Marine Science, University of
Maine

Charles Birkeland, Ph.D.
Department of Zoology, University of Hawaii

Les Kaufman, Ph.D.
Boston University Marine Program
Massachusetts

Susan Brawley, Ph.D.
School of Marine Science, University of Maine

Terrie Klinger, Ph.D.
School of Marine Affairs, University of
Washington

David Bridges, Ph.D.
Retired, Maine

Eric Knudsen, Ph.D.
Consulting Fisheries Scientist
Washington

A Christine Brown, Ph.D.
University of Maine

Arthur H Kopelman, Ph.D.
Coastal Research and Education Society of
Long Island
New York

Richard C. Brusca
Arizona-Sonora Desert Museum/University of
Arizona

Judith C. Lang, Ph.D.
Independent, Virginia

Peter F. Brussard, Ph.D.
University of Nevada Reno

Steve LeGore, Ph.D.
Association of Marine Laboratories of the
Caribbean
Florida

John R. Cannon, Ph.D.
University of Maryland at College Park

Lisa Levin, Ph.D.
Scripps Institution of Oceanography
California

James Carlton, Ph.D.
Williams College-Mystic Seaport
Connecticut

Jeffrey Levinton, Ph.D.
Stony Brook University
New York

Joseph J. Cech, Jr, Ph.D.
University of California, Davis

Romuald N. Lipcius, Ph.D.
Virginia Institute of Marine Science

Meggen Chadsey, Ph.D.
University of Washington

David K. Mellinger, Ph.D.
Oregon State University

Yong Chen, Ph.D.
School of Marine Science, University of
Maine

Fiorenza Micheli, Ph.D.
Hopkins Marine Station of Stanford
University
California

John A. Cigliano, Ph.D.
Cedar Crest College
Pennsylvania

Steven Miller, Ph.D.
University of North Carolina, Wilmington

Louis A. Codispoti, Ph.D.
Horn Point Laboratory, University of
Maryland Center for Environmental Science

Karina Nielsen, Ph.D.
Sonoma State University
California

Richard Cody, Ph.D.
Fish & Wildlife Research Institute
Florida

Elliott Norse, Ph.D.
President, Marine Conservation Biology
Institute
Washington, DC

Gershon Cohen, Ph.D.
Earth Island Institute
Alaska

Steve Palumbi, Ph.D.
Stanford University
California

Felicia Coleman, Ph.D.
Florida State University

Gustav Paulay, Ph.D.
University of Florida

Leslie A. Cornick, Ph.D.
Alaska Pacific University

Stuart L. Pimm, Ph.D.
Duke University
North Carolina

Dorinda G. Dallmeyer, M.S, JD
Dean Rusk Center, University of Georgia

Chet F. Rakocinski, Ph.D.
University of Southern Mississippi

Carlos Martinez del Rio, Ph.D.
University of Wyoming

Ralf Riedel, Ph.D.
The University of Southern Mississippi

Dan DiResta, Ph.D.
University of Miami

Pamela Roe, Ph.D.
California State University, Stanislaus

Phaedra Doukakis, Ph.D.
Pew Institute for Ocean Science
Florida

Naomi A. Rose, Ph.D.
The Humane Society of the United States
Maryland

J. Emmett Duffy, Ph.D.
Virginia Institute of Marine Science

Carl Safina, Ph.D.
Blue Ocean Institute
New York

Phil Dustan, Ph.D.
College of Charleston
South Carolina

Gorka Sancho, Ph.D.
College of Charleston
South Carolina

Christine Archer Engels, M.A.
American Museum of Natural History
New York

Gerald R. Smith, Ph.D.
Museum of Zoology, University of Michigan

John Engle, Ph.D.
University of California, Santa Barbara

Michelle Staudinger, Ph.D.
University of Massachusetts Amherst

James Engman, Ph.D.
Henderson State University
Arkansas

Robert S Steneck, Ph.D.
Professor of Oceanography, School of Marine
Sciences, University of Maine

Steve Gaines, Ph.D.
University of California, Santa Barbara

W Mark Swingle, Ph.D.
Director, Research & Conservation
Virginia Aquarium and Marine Science
Center

Leah Gerber, Ph.D.
Arizona State University

Shea R. Tuberty, Ph.D.
Appalachian State University
North Carolina

Marian Glenn, Ph.D.
Seton Hall University
New Jersey

Harold M. Tyus, Ph.D.
University of Colorado at Boulder

Michael F. Gross, Ph.D.
Georgian Court College
New Jersey

Richard R. Vance, Ph.D.
University of California at Los Angeles

Benjamin S. Halpern, Ph.D.
University of California, Santa Cruz, and
NCEAS

E. Alan Verde, Ph.D.
Corning School of Ocean Studies
Maine

Healy Hamilton, Ph.D.
California Academy of Sciences

Judith S. Weis, Ph.D.
Rutgers University
New Jersey

Kristine B. Hartney, Ph.D.
California State Polytechnic University

Robert Wilder, Ph.D.
Board of Directors (Marine Section) of the
Society for Conservation Biology
California

Gary S. Hartshorn, Ph.D.
World Forestry Center
Oregon

Dawn J. Wright, Ph.D.
Oregon State University

Carl Hershner, Ph.D.
Virginia Institute of Marine Science