

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON GULF OF THE
FARALLONES AND CORDELL BANK NATIONAL MARINE SANCTUARY BOUNDARY
EXPANSION

The Coastal Pelagic Species Advisory Subpanel (CPSAS) received a presentation from Lisa Wooninck, representing the National Marine Sanctuaries, and reviewed Briefing Book materials, including public comments. The CPSAS would like to draw upon the comments and concerns voiced by the Alliance of Communities for Sustainable Fisheries (ACSF) contained in Agenda Item C.2.d, Public Comment. In particular, we would like to highlight the following points:

[1] *Clarify that the Magnuson-Stevens Act is the dominant statute for any fishing-related management issues, including creation of Marine Protected Areas inside Sanctuaries and National Monuments.*

Although the current expansion proposal does not intend to change its designation document nor manage fisheries, this has been a sensitive issue for many years, which the Council has also noted in its comments.

[2] *Task the National Marine Sanctuary Program (NMSP) and individual sites to use robust, peer-reviewed science in management decisions. The sanctuaries have no equivalent of the Council's Science and Statistical Committee (SSC), nor any requirement to use the best available science in decision-making.*

NMSP work products would benefit by independent peer review, as is required in the Council process.

[3] *The Sanctuary Program should explain why expansions, some quite large, do not violate Congressional intent, in as much as there is a prohibition on new sanctuary designations... until such time as the Sanctuary Program shows that it is meeting its goals within budget.*

It is unclear how the sanctuaries would be able to maintain current programs under existing budgets if these sanctuaries are expanded.

By and large, fisheries have had a good working relationship with both the Gulf of the Farallones and Cordell Bank Marine Sanctuaries, and fishermen appreciate the Sanctuaries' interest in protecting the ecosystem surrounding the northern California coast. However, this expansion appears to be moving away from the original Congressional intent that Sanctuaries balance resource protections with multiple use opportunities.

The CPSAS also expresses concern over the precedent set by using administrative action to create this expansion. We suggest the above issues and others reflected in public comment are resolved before further sanctuary expansion occurs.