



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
501 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802-4213

JUL 23 2001

F/SWR4:MH

LCDR Matt Pickett  
Sanctuary Manager  
Channel Islands National Marine Sanctuary  
113 Harbor Way  
Santa Barbara, California 93109

Dear Matt:

As a participant on the former Marine Reserve Working Group (MRWG) and as a Channel Islands National Marine Sanctuary (CINMS) Advisory Council (SAC) member, I have reviewed the map and economic data of the July 11, 2001, "Working Draft Preferred Alternative MPA Area Network for the Channel Islands," version 2. This working draft recommends a proposed marine reserve design within the boundaries of the CINMS. It is my understanding that the recommendation was created by California Department of Fish and Game (CDFG) and CINMS staff for the California Fish and Game Commission.

In the accompanying transmittal letter, you ask for comments on the proposed marine reserve design. Even though the recommendation provides a summary of the existing ecological communities and the potential economic impacts for each site, I do not know the particular benefits to resources nor the confirmed impacts to the various users groups to adequately comment on the specific contents of the proposed design at this time.

However, after reviewing the recommendation package, I would like to take this opportunity to comment on some of my observations. As a general comment, please note that I was impressed with the community-based approach used in the MRWG effort. The advantage of this open process was that it brought together a diverse array of constituents with the intent of creating a marine reserve design by consensus. However, because the MRWG was unable to do this by the self-imposed May 16, 2001, deadline, the SAC directed the staffs of CDFG and your office to generate a marine reserve recommendation themselves. This charge given by the SAC basically created a "top-down" approach for formulating the preferred map. While this inverted the original process, it would have been workable if it had built upon what was unanimously agreed upon during the MRWG process. Unfortunately, the preferred alternative map does not do this. Rather, the proposed marine reserve design greatly modifies portions of the May 16, 2001,



composite map. For example, the preferred map now includes revisions to the Gull Island parcel off Santa Cruz Island, the north end of San Miguel Island and also proposes closures at Anacapa Island and Santa Barbara Island.

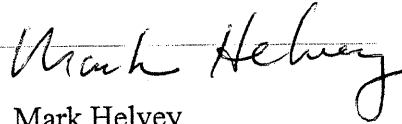
The inclusion of fishing closures at Anacapa Island and Santa Barbara Islands are possibly the most significant changes from the MRWG "composite" map and will probably be the most controversial. I recall that earlier proposals to close portions of these islands during the MRWG process led to a breakdown in negotiations because of the important socio-economic benefits noted by some members of the fishing community for these two islands. Due to the economic benefits derived from these areas, I question whether proposing smaller areas at these islands, modifying proposed closure areas to some form of limited fishing, or locating the closures in other areas of the respective biogeographical provinces would achieve the same ecological results yet minimize the socio-economic impacts to the fishing community. Such an effort to do this would be consistent with all the goals and objectives established by the MRWG members.

On the topic of Santa Barbara Island, the case for "connectivity" between this island and the remaining northern Channel Islands as part of a network system seems tenuous. As you are aware, developing an optimal network for species enhancement and sustenance of fisheries requires an understanding of the factors affecting dispersal. To maintain that Santa Barbara Island is physically integrated with the other islands as part of a marine reserve network should be documented in the recommendation.

One noticeable omission in your recommendation package is an explanation of the perceived fishery benefits expected from the proposed closures at each location. For example, what will be the expected biomass trajectories of the proposed marine reserve design for species managed by the Pacific Fishery Management Council (Council)? I appreciate the considerable effort that went into identifying locations of important habitat types and ecological processes around the various islands. However, without knowing how these proposed closure areas will be translated into improved fishery yields makes it impossible to determine if these proposed fishing closure areas are accommodating a habitat quantity objective or if they are offering high habitat quality where the resident species are expected to reproduce to their maximum potentials. Certainly, NMFS, Southwest Region will be quite interested in the latter and I believe that this information will be especially relevant when the CINMS and CDFG present their recommendation to the Council for consideration of closures in the Sanctuary's Federal waters. You also should be aware that the Council will be unable to promulgate fishery regulations without defensible ecological and economic justification for the size and location of proposed fishing closures within CINMS. I am aware that both the Council and its Scientific and Statistical Committee requested additional scientific and economic documentation including reserve size from you and assume this will be forthcoming once you have reviewed and analyzed comments on your proposed marine reserve map.

I am grateful for this opportunity to examine the working draft recommendations and acknowledge the hard work that your staff as well as that of CDFG have invested in this effort. I do think that you will have a smoother time getting this recommendation through the State and Federal regulatory hurdles if you continue to seek the support of the fishing community. If you have any questions, please call me at (562) 980-4046.

Sincerely,



Mark Helvey  
EFH Coordinator and  
SAC Member

cc: Rebecca Lent - NMFS-SWR  
Svein Fougner-NMFS-SWR  
Cindy Thomson - NMFS - SWR  
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