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OCT 10 2001

**COALITION TO PRESERVE and RESTORE PT. PINOS TIDEPOOLS**

P.O. Box 433, Pacific Grove, California 93950

Within these areas, no risk of change is considered acceptable unless it is part of a natural process\*

**PFMC**

October 1, 2001

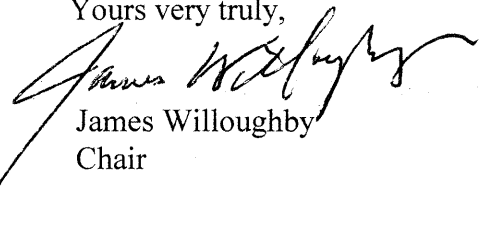
Dr. Donald O. McIsaac  
Pacific Fishery Management Council  
2130 SW Fifth Avenue, Suite 224  
Portland, Oregon 97201

Dear Dr. McIsaac:

In accordance with the correspondence we received concerning the Pacific Fishery Management Council public meetings scheduled for October 28 through November 2, 2001 in Millbrae, it is noted that one of the topics on the agenda is Marine Reserves. Our organization is submitting written public comments via a copy of a letter sent to California Governor Gray Davis earlier this year concerning establishing marine reserves along the central California coast, specifically in Monterey Bay. Please include the Governor's letter and accompanying pamphlet in the briefing books to council members prior to the meeting.

We appreciate receiving notice of this important meeting, and thank you for the good work you are doing.

Yours very truly,



James Willoughby  
Chair

enclosures

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February 20, 2001

The Honorable Gray Davis  
Governor, State of California  
1st Floor State Capitol  
Sacramento, California 95814

Dear Governor Davis:

The organization which I chair is again writing to you concerning the dearth of **“fully protected marine reserves”** along the Central California coast. Please allow me to call to your attention that many citizens and conservationists on the Monterey Peninsula, and users of our coastal resources are in favor of a **“fully protected Pacific Grove Marine Gardens Fish Refuge,”** a refuge established by the State Legislature in 1963. This is a refuge that literally serves thousands of users each year.

Our primary concern are the pre eminent Great Tidepools of Pt. Pinos that lie within this refuge. In recent years there has been an observable reduction in biodiversity and abundance of marine life. This is the same phenomenon that has occurred in the tidepools of Southern California, and which has been documented in scientific studies recently presented to USC's Academy of Sciences. This reduction is attributed to human impact.

Our tidepools, with their easy access especially Pt. Pinos, are unquestionably some of the most magnificent in the temperate zones of North America. Moreover, they have great biological, historical and archeological significance. Unfortunately, these fragile tidelands have been sadly neglected by the agencies with primary responsibilities for marine resource management and conservation.

\*Pacific Grove Coastal Parks Plan

The people of this community became so concerned with the lack of protection of local tidepools that they banded together and formed a **“Coalition to Protect and Restore Pt. Pinos Tidepools.”** In spite of citizens’ efforts and a peoples’ grassroots Initiative, the local Fish and Game Department, Monterey Bay Sanctuary and its Sanctuary Advisory Committee have not supported citizens’ pleas for **‘total protection’, often referred to as ecological ‘no take’ zones.**

Last Spring, 1400 environmentally oriented citizens signed a conservation petition calling for greater marine protection in our refuge. Later in the Fall, a successful Citizens’ Initiative (1700 (20%) of registered voters) in Pacific Grove directed the City of Pacific Grove to file with the California Department of Fish and Game, (DFG Code 1002 (h), an Objection to the taking of invertebrates from tidepools within our refuge. We also oppose the taking of kelp from our refuge for commercial purposes which can readily be obtained elsewhere. The Objection was filed June 8, 2000 with the Fish and Game Commission and DFG. To date, we have had not have a written response, but expect a legal decision from Joseph Milton, DFG Counsel in the near future.

A six member committee of the Coalition recently requested a meeting with Sacramento DFG representatives. This meeting was held 2/16/01 with Director Hight’s aide, David Bunn, and a local DFG permit officer, the Coalition’s attorney and a representative of Assemblyman Keeley’s staff. Mr. Bunn candidly admitted the DFG has lacked staff, budget and even interest up to this time in tidepool management. With the exception of law enforcement and six newly posted conservation signs which were initiated by the Coalition, little has been done in the way of effective local tidepool conservation.

Mr. Bunn also commented that California tidepools with their wonderful life, their educational and recreational value have not been a priority or even an issue with the California Legislature. He confirmed our deepest suspicions that the DFG is reluctant to share any of its management authority with the City of Pacific Grove. However, in the past, the State Legislature established a precedence of sharing authority with other institutions, public and private.

Another objective of the Coalition is to bring to the attention of the Legislature the very loosely defined wording in the DFG code regarding collecting for '**scientific purposes**'. Because of the obstinacy of the DFG to release collecting reports and/or the absence of such reports, we believe this provision of the law and the privilege of "scientific collecting" has been greatly abused, and that definitions and terminology must be tightened up to include only "**bona fide**" science, science that helps to define the health and fitness of the resource.

We would hope we would have your interest and support so that we may tell the people of this community that the State's Legislature is indeed concerned with fully protected "**no take**" reserves which are the vanguard of marine conservation throughout the world in this new millennium.

We are aware of the pressing energy problems facing California at this time and the great responsibilities on your shoulders, but hope you can find the time to respond to our concerns.

Yours very truly,

James Willoughby, Chair

cc: Fred Keeley, Assemblyman  
Dan Basta, Director of Sanctuary Programs

## WILL YOU HELP US PRESERVE AN IRREPLACEABLE RESOURCE?

The fascinating community of marine organisms that inhabit the intertidal zone of California's coastline is in serious danger. Indiscriminate, mass collecting of specimens and the disturbance of the habitat have caused an alarming decline in the population of many species.

The tide pools, rocky pockets which retain water when the tide goes out, and the intertidal zone, that area between high and low tides, host an extremely rich and diverse marine community. Making their home here are species of plants and animals including seaweeds, barnacles, anemones, sponges, worms, snails, sea slugs, clams, oysters, scallops, seastars, chitons, octopuses, abalones, periwinkles, limpets, mussels, cockles, shrimps, crabs, sea urchins, and fish.

The ecology of the intertidal zone, as complex as it is fragile, adds a great deal to the natural values of state coastal parks and refuges. Because of the fragile nature of this marine community, it is easily disturbed. Such a simple act as turning over a rock can expose certain immobile marine animals to the fatal rays of the sun. Therefore, regulations have been adopted to protect most of the invertebrates in the intertidal zone of the state. Your cooperation in observing these regulations is essential if the unique marine community of the intertidal zone is to be preserved for this and future generations.

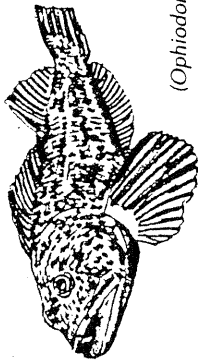
### TIDEPOOLS

*The sea spat out along its shore  
logs and weeds and shells galore.  
It offered from its warm, green, deep  
treasures to view, to ponder,  
but the shore to keep.*



## NOICE:

This is only a guide to this area's special regulations. Always consult the Department of Fish and Game's regulations.



Lingcod  
(*Ophiodon elongatus*)

Call any State Park office or the Monterey Department of Fish and Game office at (408) 649-2870 for current information.

No commercial fishing is allowed in reserves or refuges.

A current California sport fishing license is required for any person 16 years and older to take fish and invertebrates. Taking of fish and invertebrates is restricted by seasons, as well as, bag and size limits.



Department of Parks and Recreation  
Department of Fish and Game  
State of California - The Resources Agency

Illustrations - Sarah S. Tamblyn

Second printing, June 1998



printed on recycled paper

# Sport Fishing Guide Reserves, Refuges, and State Parks of the Monterey Bay Area



Taking fish, including invertebrates, is permitted as specified in Department of Fish and Game regulations.

**Special regulations apply in:**

**1**

**HOPKINS MARINE REFUGE**

Boating and diving is allowed, but no taking of marine plants, fish or invertebrates. Please do not disturb experiments in progress. Refuge includes waters to 60 feet deep.

**\***

**2**

**PACIFIC GROVE MARINE GARDENS FISH REFUGE**

Boating and diving allowed. Fishing and spearfishing is permitted for fin fish and eels. A valid sport fishing license is required. No taking of any other marine life or shellfish is permitted. Refuge includes water to 60 feet deep. The refuge includes Asilomar State Beach.

**3**

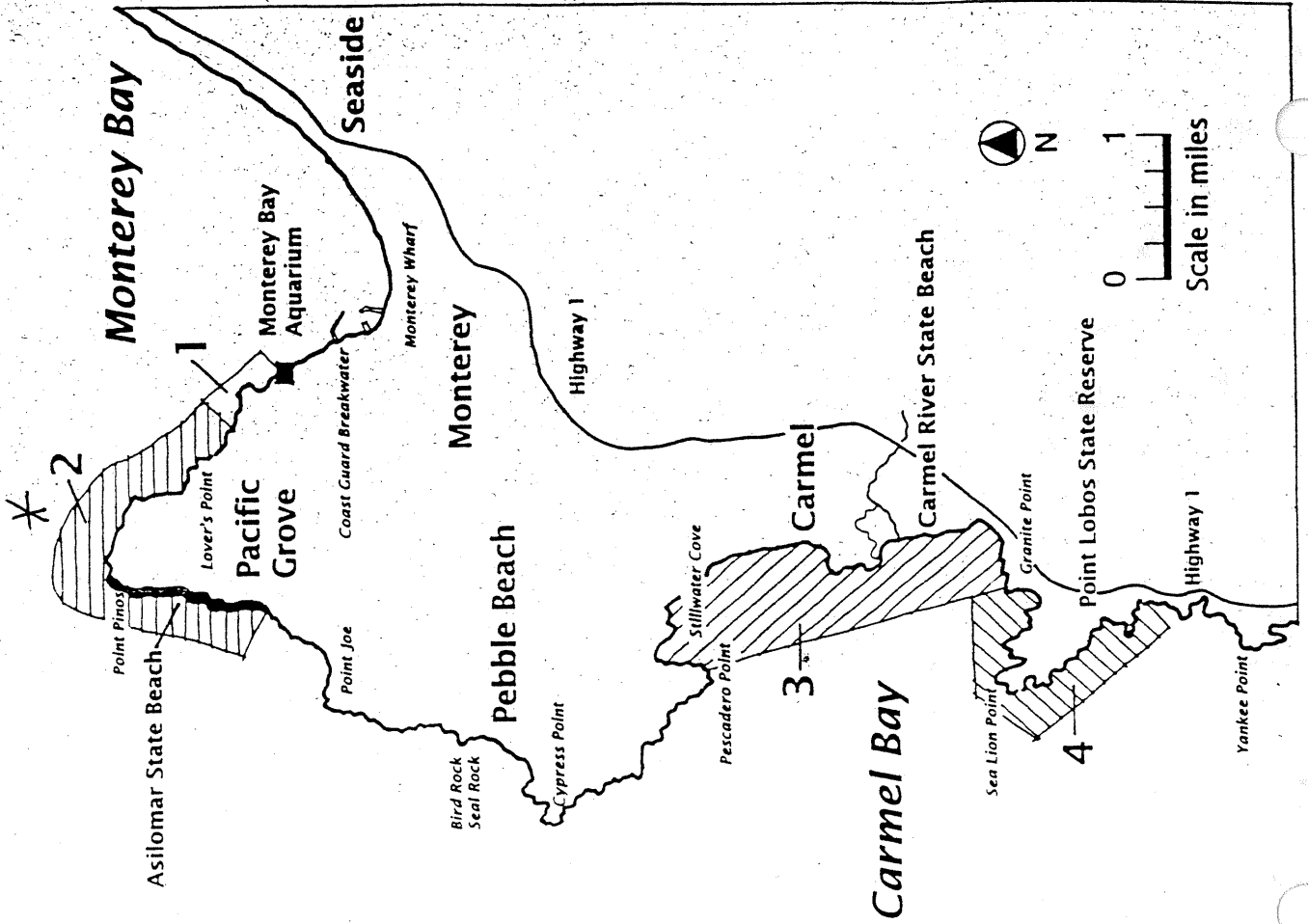
**CARMEL BAY ECOLOGICAL RESERVE**

Boating and diving allowed. Fishing and spearfishing is permitted for fin fish and eels. A valid sport fishing license is required. No taking of any other marine life, shellfish, or marine plants is permitted. The Reserve includes water to 90 feet deep in area of the Pinnacles. See the map for the remainder of the Reserve boundaries.

**4**

**POINT LOBOS STATE RESERVE**

Entry permitted only through main gate at Pt. Lobos State Reserve. Boating and diving allowed. Diving in Pt. Lobos allowed only in Whalers Cove and Bluefin Cove by permit only, (see Pt. Lobos dive brochure). No fishing or taking of any kind is permitted. Reserve boundaries are approximately 500 yards from shoreline.





OCEAN AND COASTAL POLICY CENTER  
MARINE SCIENCE INSTITUTE  
SANTA BARBARA, CALIFORNIA 93106-6150

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**PFMC**

September 14, 2001

Mr. Robert Hight

**Director**

California Department of Fish and Game  
1416 Ninth St. 12<sup>th</sup> Floor, Sacramento, CA 95814

**Regarding:** Failure of Marine Reserve Work Group. Channel Islands National Marine Sanctuary (CINMS) and California Department of Fish and Game (CDFG).

Dear Mr. Hight,

I was a member of the Marine Reserve Work Group. As a volunteer in this process, I spent roughly two to three days per week preparing for meetings, and participating in informal discussions with commercial fishers.

After the February 2001 meeting of MRWG, I resigned from the planning process. Recently, I have heard that Mr. Robert Fletcher has blamed conservationists for the failure of MRWG. Since I understand that Mr. Fletcher is a major player in the current debate over the establishment of no-take marine reserves within State waters, I thought it would be appropriate to share with you and the CDFG Commission my "letter of resignation" from the MRWG, which is dated February 20, 2001. This letter clearly describes why I resigned from the planning process. The letter was widely distributed to the media, the Sanctuary Advisory Council, federal and state resource agencies, and other interested individuals. The letter is also part of the administrative record.

The major reason I resigned from the process is the lack of good faith on the part of Mr. Fletcher and Mr. Tom Raftican, who both failed to contribute to the planning process on all counts. Both of Fletcher and Raftican represent important recreational interests. They failed to accept the scientific evidence and the basic tenets of community-based planning and decision making.

My letter of resignation was based on my expertise in collaborative ecosystem-based planning and management. I have received support from three National Science Foundation grants to study collaborative decision-making. I have published several essays on the subject.

Despite the general failure of the CINMS/CDFG Marine Reserve Work Group to reach consensus on a map, this collaborative process has been successful. The indicators of success are: increased public participation and general discussion, more coverage of the issue in the local and regional newspapers and media, a heightened sense of "accountability" and "partnership" within and between resource agencies, and the development of a regional social network and alliance that is in favor of marine life conservation. Members of the community are more informed about the marine environment, and less apathetic. The partnership and cooperation between diverse government agencies, such as the National Park Service, the CINMS and the CDFG, is perhaps the greatest sign of success – it needs to be

sustained during the next several years of developing and implementing the MLPA and federal environmental laws.

Since the Science Advisory Panel's recommendation, the members of this region and community have become better educated about their relationship to the marine systems of the Bight and the northern Channel Islands. CINMS management has received over 10,000 letters in support of the use of no-take marine reserves within the sanctuary. Local and regional newspapers have covered the marine reserve planning process, and reported on the ecology and economic use of the sanctuary. In public testimony, several hundred individuals have spoken in favor of the Science Panel's recommendation. It is fair to say that the region and public sentiment is strongly in favor of no less than 30% as the bottom level of protection for the CINMS.


Overall, the proposed map (July 2001) of a network of marine protected areas (MPAs) encompasses 25% of marine areas within the boundaries of the CINMS. *The proposed reserve scenario fails to protect kelp forest and shallow reef habitat and associated marine life against the dynamic and ever-changing climate-ocean variability of the Southern California Bight.* The proposed reserve design protects only 17% of the kelp forests within the Oregonian province and 12% of the kelp forests within the California province are part of a proposed reserve scenario (Page 15). Based on the "best available scientific information", the proposed reserve scenario cannot protect kelp ecosystems in the California and Oregonian biogeographical provinces.

Many of these nearshore kelp and reef ecosystems are used by commercial and sports fishers. In general, the quality reef and kelp habitats are not part of the CDFG/CINMS proposed reserve system for the State waters within the national marine sanctuary. Field biologists who know the Channel Islands have informed us that the most important high quality nearshore habitats are not part of the proposed reserve design. Moreover, I am concerned that some of the habitats that are part of the proposed map will be cut by the CDFG to support the short-term interests of commercial and sports fishing industries. Such a "cut" on the proposed reserve would represent a clear sign that the values and interests of special interests are primary to those of this region, place, and community.

As a member of this community, I believe that a future reduction in the level of marine life protection under the CDFG/CINMS proposed plan would represent a major compromise on the 'best available scientific information', a break from the public interest, and a turn away from the intent of relevant federal and state environmental laws, such as the Marine Life Protection Act (MLPA) and the National Marine Sanctuary Act (NMSA).

If you should wish to discuss this comment letter in more detail, please feel free to contact me at (805) 683 1676.

Thank you,



Michael Vincent McGinnis, Ph.D.  
Director  
Ocean and Coastal Policy Center  
University of California, Santa Barbara

cc. California Department of Fish and Game Commission  
Pacific Marine Fisheries Council



DATE: FEBRUARY 20, 2001  
FROM: MICHAEL VINCENT MCGINNIS, PHD  
Member, Marine Reserve Work Group, Channel Islands National Marine  
Sanctuary

REGARDING: THE CHANNEL ISLANDS NATIONAL MARINE SANCTUARY  
PROGRAM'S MARINE RESERVE WORK GROUP

I represented local conservation interests in the Channel Islands National Marine Sanctuary's Marine Reserve Work Group. Last Thursday, at the end of an all-day meeting to discuss the group's major differences, I withdrew from this process. I have been asked to provide you with information on why I left this process.

Over one year ago, I wrote the Study Area Report for the Channel Islands National Marine Sanctuary's management plan revision process. I was asked to join the Marine Reserve Work Group before completing this study last January 2000.

I am familiar with the ecology of the northern Channel Islands and the Southern California Bight. As a political scientist, I am also very familiar with the needs of consensus-based decision-making (and have received support from the National Science Foundation since 1993 to study these types of planning efforts for wild salmon, rivers and watersheds).

I have attempted to persuade members of the group to support biodiversity and resource protection in the northern Channel Islands. This marine system shows dramatic signs of ecosystem disturbance, which is caused by human activity and natural events. I support the Science Panel's recommendation that 30-50% of a network of large no-take marine reserves is needed to protect fisheries and marine biodiversity. Since September 2000, the scientific evidence for the establishment of large no-take reserves has been growing. This past Saturday, 160 of the country's top marine scientists signed a petition in favor of large no-take marine reserves.

Despite the clear and compelling evidence and consensus-based recommendation from the members of the CINMS's Science Panel, the Marine Reserve Work Group has failed to agree on a minimum level of biodiversity and fisheries protection-not even the low end of the science panel's recommendation of a 30% no-take reserve scenario has been accepted by the user groups at the table. Last Thursday, you have agreed to move to mapping without agreeing on the basic issue of size of future reserves. Conflict over the size of reserves will return. Without a clear criteria that supports the promise of large reserves, I fear that the mapping activity will conclude without achieving the goals and objectives of biodiversity protection and sustainable fisheries.

We have not been dealing with unfavorable information. The truth of this information can take many forms -- a fisher's knowledge, a story from your father, the meadowlark's song that wakes me up early each morning, or the overwhelming weight of the scientific evidence offered in this process thus far. All are part of the foundation of this "community-based" process.

Nothing is more untenable than a political regime, which is indifferent to truth. The task of "truth telling" is an endless work: respecting it in its complexity is an obligation no power can dispense with. Unless to impose the silence of servitude.

– Michel Foucault

When you question the importance of truth, you also question the importance of the trust that is needed in this political process to reach consensus. Consensus means very little to this community if you break from some bottom-level of biodiversity and resource protection. I think that is the direction you have chosen.

I have two major points:

#### FIRST

“A viable community,” writes Wendell Berry, “like a viable farm, protects its own production capacities. It does not import products that it can produce for itself.” We need some combination of economic and ecological resolution to our differences. This does not require that we break from the merits of local or scientific knowledge – our economy depends on both. Without prosperous local economies, the people of this place have no voice and no power. The local knowledge needs to be protected but not by rejecting scientific information.

We need to develop (together) a strong local economy that supports the needs of local fishers, who are willing to work (together) in fishery cooperatives, who are willing to develop local and regional markets for local fish landed. We can't keep exporting all the protein from our regional waters. Instead, a “sustainable fisheries stamp” is one idea, but let's not break from the best available scientific information. The federal or state governments can help, but we should depend on our own shared resources to develop and renew a sense of a healthier economy.

SECOND, We need to protect the ecology of community. One general goal of collaboration is to “solicit” community, but not by creating a process that forsakes the truth for an irresponsible outcome that diminishes the ecology of a place.

The facilitators are stakeholders in this process, and decided to break away from the promise of the joint-fact finding process, which is the cornerstone to collaborative decision-making. Values matter. But the best available scientific information, the general level of public support in favor of reserves, and federal and state laws matter as well.

I hoped that we could bring the truth out into the open, to discuss our shared interests and diverse forms of knowledge, and to build common ground of understanding. In this type of process, a shared knowledge can be created.

I have witnessed the development of a shared trust among some members of the MRWG, but no shared sense of responsibility to the community and place. Since September, the tactic for many of you in this process has been to find ways of avoiding and denying a truth – we need to recognize that this community needs large reserves around the northern Channel Islands; that the rocky reefs of the Islands are unique and important to humans, birds, mammals, invertebrates, kelp and fishes -- these animals and plants are not only resources to use but are essential parts of our community and this place.

I do not believe that the MRWG can satisfy the goals of biodiversity protection and sustainable fisheries by breaking from some bottom-level of protection, as recommended by the Science Panel. There will be economic impacts, and we should work hard together in this community to equitably and responsibly deal with these impacts but not by compromising on Science Panel's recommendation.

I withdrew from the MRWG this past Thursday afternoon because this group agreed to break from the bottom-line level of protection of fisheries and biodiversity. Such a move,

in my view, is compromise on the needs of this community and my interests as a stakeholder in this process. We need large no-take marine reserves for the following reasons:

#### GENERAL ECOLOGICAL INFORMATION

- I. The Southern California Bight is the most studied system in the world (Hickey 1993).
- II. The ecology of the Bight, including the CINMS, is influenced by the relationship between oceanography (currents and eddies), biology and climate.
- III. The animals and plants of the Bight are influenced by ocean-climate variability. Temperature of the sea is a contributing factor to change in abundance and distribution of marine life in the Bight.
- IV. The current warm-water regime began in 1977 (while the sanctuary was designated in 1980).
- V. There has been a large-scale decline in primary and secondary levels of ecological productivity in the Bight (McGowan et al. 1998 among others).
- VI. We do know that over the past 60,000 years, the Bight has included a cycle of cold- and warmer-water regimes. After studying the core sediments of the Santa Barbara Channel Dr. James Kennett et al. found no evidence of species extinction at the benthos level. Today populations of benthos invertebrates and other animals are very low. Extinction is a possibility.
- VII. The current warm-water regime has had affected the distribution and abundance of marine animals and plants. There has been a general decline the food supply produced in the euphotic zone; a decline in bird abundance (e.g., the sooty shearwater has declined by 90% since 1988), fishes, plankton, and invertebrates; and a decline in southern California kelp (that began in the 1958).
- VIII. Scientists show an increase in climate-related events, such as intense storms, El Nino events, among others. These natural events impact the ecology of the Bight. A special White House Task Force on Regional Impacts of Climate Change shows that the temperature of the Eastern Pacific is getting warmer.
- IX. Many species and habitats show a trend toward decline that began before the current warm-water regime. The evidence shows a decline in the biomass of the Bight.

#### ON MANAGEMENT

- I. The SANCTUARY does not have the capability to enforce its mandate to "protect".
- II. There are 15 CDFG marine wardens in southern California.
- III. There is 1 NMFS special agent for enforcement in southern California. In general, given the character to ecosystem disturbance noted above, the CINMS, the CDFG, the NMFS, and the NMSP have not protected the animals and habitats of the sanctuary.
- IV. We need to develop methods of co-management, adaptive management, integrated management, watershed-based management that include comprehensive monitoring and enforcement approaches and combine government and nongovernment roles.
- V. Local knowledge matters; it is a form of truth based on the knowledge of the terrain and system. It can take many forms. Local knowledge is not incompatible with scientific information.

#### FEDERAL AND STATE INITIATIVES

- I. 17 federal agencies now support an ecosystem-based approach to biodiversity protection, including the US Department of Defense, the NRC, AAS, and the Executive Office of the White House.
- II. The National Marine Sanctuary Program emphasizes an ecosystem-based approach to protect marine diversity.
- III. The National Marine Sanctuary Program is compatible with the CDFG (February 2000) Marine Region Strategic Plan: An Ecosystem Approach to Managing California's Diverse Marine Resources. The Mission of the CDFG is "to protect, maintain, enhance, and restore California's marine ecosystems for their ecological values and their use and enjoyment by the public."
- IV. A marine ecosystem-based approach requires the protection of habitats and species diversity.
- V. There are a range of federal and state laws that support the use of no-take marine reserves, such as the MLPA.

#### ON CONSUMPTION AND PRODUCTION

- I. We do not eat most of the fish that are caught within the sanctuary. Why?
- II. 15% of the California fish landings are from the CINMS. New global fisheries began after 1980, and are now found within the sanctuary. The top fisheries (by value\$ and by volume) are caught in the sanctuary and are exported (squid, urchins, among others). Some of these fishing industries use more ecologically destructive technologies than others, e.g., trawlers.
- III. Less than 15% of the total fishers catch more than 80% of the fish.
- IV. A large proportion of commercial fishers do not make a living only by fishing. They often need two or more jobs.
- V. Commercial and sports fishing activities contribute less than 3% to this region's economy.
- VI. Californians import most of the fish eaten and export most of the fish caught. Why?
- VII. Global markets have replaced the local markets for fish caught in this region, and threaten the future of this maritime culture and local economy. I believe that the level of resource extraction that is part of the global market for fishery resources exacerbate the capacity of marine species and plants to adapt to the current warm-water regime disturbance.

#### ON BIODIVERSITY PROTECTION The Link between the Policy and Science

- I. The Science Advisory Panel Recommendation reads: "The best available science demonstrates that the minimum area set aside should be no lower than 30%, and perhaps 50%, of representative and unique marine habitats, features, and populations of interest in all bioregions of the CINMS. Because of the complexity upon which this estimate is based, evaluation of its effectiveness is necessary to determine whether alteration (reduction or increase) is appropriate based on future assessments."
- II. The Science Panel recommendation included both empirical and theoretical evidence.
- III. The Panel's recommendation is consistent with the scientific literature on the merits of no-take marine reserves, and recent recommendations by the NRC and other scientific organizations.

- IV. A 30% recommendation can protect up to 70% of the biodiversity that we have information on. 50% can protect up to 85% and can minimize the risk of biological collapse.
- V. The Science Panel recommendation did not cover the needed insurance (120% to 180% of any particular reserve scenario).
- VI. For the first time in 20 years, marine managers, the scientific community and the general public has some understanding of the meaning of marine biodiversity "protection" for the northern Channel Islands.

Members of the Science Panel believe that the size of reserves matter. The goals/objectives of biodiversity protection and sustainable fisheries Since the late 1950s, scientists have recognized that size of habitat protected is directly associated with the level of biodiversity and resources protected. We cannot hope to protect threatened fish, endangered birds, and marine mammals in a series of small, disconnected, detached, multiple-use reserves. Size matters.

It has been argued that the National Research Council's draft report (2000) is inconsistent with the Science Panel's recommendation. This assumption could not be further from the truth. The information for the NRC report was collected three years ago, before the NCEAS group on no-take reserves was created, and before the Science Panel (and Satie Airame) began their joint fact-finding efforts. Several of the marine scientists who worked on the NRC report signed the petition at the AAAS meeting in San Francisco. On what basis do you reject this information? Take a hard look at the available socio-economic information before you answer this question.

The conservationists and other interests at the table held out an olive branch at the last meeting, with the hope of working with those who remain unwilling to accept the scientific information. Without large reserves you can not protect quality habitat; small reserves will serve very little purpose. Given the dynamic and complex nature of the northern Channel Islands, small reserves cannot serve the function of protection but, rather, the illusion (and general misperception) of protection of life. My greatest fear is that the MRWG will recommend a reserve design that merely perpetuates and simulates the illusion of protection.

I am not in favor of a process that perpetuates that illusion of protection, the faking of "sanctuary", or the faking of reserves.

As a "stakeholder", I come from the standpoint and principle that the land and sea are irrevocably connected, and that biodiversity and culture depend on a healthy marine-coastal interface. We are all part of the "problem" -- we are all part of the solution. I accepted the stakeholder position as the representative for local conservation interests. I am accountable to these interests. If they are violated, there is no place for me in this process.

Micheal Vincent McGinnis, Ph.d.

