

Alliance of Communities for Sustainable Fisheries
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To Whom It May Concern:

We are writing to express our concern over several recent actions by the Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO). We now wonder if PISCO is moving away from being a science-based organization, and becoming, at least on the topic of Marine Reserves, an advocacy group. We wonder if PISCO realizes the impressions that certain recent actions on its part have created among the public who have been following the debate over Marine Reserves. Society expects science to be objective, fair and impartial. We therefore point out that advocacy for a theory that results from or causes a loss of objectivity on a topic that affects so many people and resources can have serious consequences, such as:

1. Social and economic damage
2. Fail to deliver intended benefits
3. Lead to actionable abuse of due process by government and advisory groups that rush into such MPA policies at a time when the scientific rationale for them has fallen into serious question
4. Cause unintended harm to fishery resources, which diminishes a basic food supply for our country

We hope that PISCO and the greater science community understands the weight of responsibility for its role in providing objective information in the Marine Reserves decision-making process.

Our first area of concern lies in the publication of "The Science of Marine Reserves", which purports to present the latest and most complete science on this topic. We have been following the science well enough to know that the wave of support for the widespread use of Marine Reserves and MPAs generally to solve a host of ocean ills has already passed. The next wave that is building is of more critical thinking as to: cautions and limitations that result from their use as a fishery management tool; for their ability, or lack of, to successfully restore a native biodiversity; their potential harmful impacts on neighboring areas; and, the need for more research to be done regarding unintended or unexpected consequences. This is not just the opinion of a bunch of fishermen; we know respected members of the science community are beginning to challenge some of the claims made about the benefits of Marine Reserves. There is, however, very little discussion of criticism or competing theories regarding the effectiveness of Marine Reserves in "The Science of Marine Reserves." These omissions are obvious to informed readers, and we fear that PISCO not only loses credibility, but will be seen as rushing to judgement before its case falls apart under critical peer review.

Of particular concern is the credit given to Dr. Ray Hilborn, of the School of Aquatic and Fishery Sciences at the University of Washington, for his review and comments on this PISCO report. We know that Dr. Hilborn does support the use of Marine Reserves in certain circumstances. However, he has also been one of the scientists who is of the second wave, offering critical evaluations of Marine Reserves, particularly as to their benefit and costs in fishery management regimens and impacts on neighboring areas. He has also challenged many of the case studies cited by Marine Reserves supporters as not really being on-target to substantiate actual benefits. We have since learned that Dr. Hilborn's comments, solicited by PISCO, were in fact received, but not incorporated in the PISCO document. PISCO should consider that it can seem misleading to issue a statement that thanks Dr. Hilborn and credits his comments, leading to the impression that he supports this report, when in fact he expressed concerns. A copy of a statement issued by Dr. Hilborn is attached for your review. It suggests that he is among the informed readers who view the PISCO report as an advocacy instead of a science-based document.

Also not included, even by mention or in the bibliography of resource materials, is the study done by Dr. Robert Shipp, Chair of the Marine Sciences Department at the University of Southern Alabama. Dr. Shipp has also served for nine years on the Gulf of Mexico Fishery Management Council, including two terms as Chair. His study is of approximately 350 species of fish, including most West Coast fished species. He concludes that Marine Reserves are of no benefit, and may even be of negative benefit, for approximately 98% of these fish stocks as a fishery management tool. The fact that this study, which is well known in the science community, was not even mentioned in the PISCO report, also makes informed readers wonder if the PISCO authors are interested in presenting the full array of critical thinking. Again, we do not think that this bewilderment is limited to fishermen; other members of the science community will be lead to wonder about PISCO's objectivity as well. For your information, the Shipp Report has been peer reviewed and will be reissued by the author early in 2003.

Possibly the most surprising activity on the part of PISCO that made many wonder about PISCO's objectivity, lies in the format of its three "media workshops on the science of Marine Reserves" on the West Coast. Apparently these workshops were put on in Corvallis, Oregon, and La Jolla, California prior to our learning of an upcoming workshop to be held at the National Marine Fisheries Lab in Santa Cruz. At the workshops in Oregon and in La Jolla, and as was proposed for Santa Cruz, the public was excluded from the workshops and only selected media representatives invited. Specifically excluded were journalists writing for major fishing publications – puzzling for an interdisciplinary partnership.

Additionally, the topics at the workshops were not merely the science of Marine Reserves, but also the results of a public opinion poll. This public opinion poll is so biased in its construction that it is truly laughable. We don't understand what opinion poll results have to do with science. PISCO should consider the impression given that it was to lead journalists to a particular conclusion. With regards to the Santa Cruz media workshop, after representatives from the fishing community learned of the workshop and strongly objected, two fishing representatives were finally able to get an invitation after much initial resistance on the part of PISCO. However, representatives from the fishing publications, including major national fishing magazines such as Pacific Fishing, were still excluded, and the fishing representatives were not allowed to speak or ask questions. Please consider the message that these events conveyed, that PISCO did not want to have anyone participate in these media workshops who might ask critical questions or challenge the information being presented in any way. No critical thinking on a University campus?

We hope that PISCO will reflect on the impressions that have been created. The Alliance of Communities for Sustainable Fisheries expects PISCO to be objective and strongly science-based. We are so concerned that we will be requesting of the California Department of Fish & Game that they not represent the PISCO report as it is currently written as the best and most complete science on Marine Reserves, as they recently did by providing a copy of "The Science of Marine Reserves" to each MLPA panel member in our area. We will ask the Department of Fish & Game to provide a copy of Dr. Ray Hilborn's statement and also provide a copy of the Shipp Report when it is republished early in 2003. We will also request the same of the National Marine Sanctuary Program.

The Alliance of Communities for Sustainable Fisheries and people who fish generally, want to have a constructive and mutually educational relationship with the science community on a topic as important as the sustainability of our ocean resources. We are very willing to work with PISCO and the science community at large in developing what truly is the best available science on these important topics. Indeed, we have been offering for some time the experience of our on-the-water observations. Our at-sea experience (in some cases 200 plus days a year for 30-40 years) will add to the empirical base needed to develop valid data and tested scientific hypothesis. We want to help! PISCO, however, also needs to reflect on the impressions which its actions

have given, and on its objectivity. We need PISCO to do good science, and to be watchful of dismissing evidence that contradicts (or at least greatly constrains) the far-reaching conclusions PISCO appears to want to implement.

Sincerely,

Mike Ricketts
Co-Chair, ACSF

Kathy Fosmark
Co-Chair, ACSF

Supporting Associations & Organizations

Pacific Coast Federation of Fishermen's Association
Port San Luis Commercial Fishermen's Association
Morro Bay Commercial Fishermen's Association
Monterey Commercial Fishermen's Association
Fishermen's Association of Moss Landing
Santa Cruz Commercial Fishermen's Association
Half Moon Bay Fishermen's Marketing Association
Fishermen's Alliance
Western Fish Boat Owners Association
Ventura County Commercial Fishermen's Association
Federation of Independent Seafood Harvesters
Golden Gate Fishermen's Association
Port San Luis Harbor District
City of Morro Bay Harbor
City of Monterey Harbor
Moss Landing Harbor District
Santa Cruz Port District
Pillar Pt. Harbor, San Mateo County Harbor District

C: The Honorable Sam Farr
The David & Lucile Packard Foundation
The Leon & Sylvia Panetta Institute for Public Policy
National Science Foundation
Michael Flores, President, CFG Commission
Robert Hight, Director, CDFG
Bill Douros, Superintendent, MBNMS
Stephanie Harlan, Chair, MBNMSAC

Enclosure

“The Science of Marine Reserves” a comment

Ray Hilborn
School of Aquatic and Fishery Sciences
University of Washington

The combination of the video and pamphlet “The Science of Marine Reserves” is now widely circulated and being used in a number of public forums with proponents claiming it summarizes the state of the scientific knowledge regarding marine reserves. I was asked to review an original draft, and did provide comments, and am listed as a reviewer in the document. However, as none of my comments seem to have had any impact on the final draft, I thought I would circulate some of my criticisms of the document.

Let me state that I am broadly in favor of Marine Reserves, and believe they are a valuable tool for protection of biodiversity, and in some cases may be an important tool in fisheries management. However, I feel that the public consideration of Marine Reserves should look at all aspects of the available evidence and not be based on selective presentation of evidence.

The document is clearly not a scientific document nor would I say that it has been peer reviewed in the normal sense. It is not “scientific” in that it does not critically review the state of scientific knowledge, presents competing hypotheses and evidence for and against the hypothesis. It is an advocacy document that selectively chooses which data to present, and in no cases does it present any of the alternative interpretations of the “evidence” included in the document.

I don’t believe it has been “peer reviewed” in the sense of scientific journal articles, because there was no independent editor, rather than authors simply solicited comments which may or may not have been incorporated depending upon the authors judgment.

Several examples of how evidence has been selectively chosen alternative interpretations not considered are given below/

The Merritt island and St. Lucia examples were both published in a paper by Roberts et al. in Science. Science also published critiques of these examples. None of the elements of the critiques was mentioned in the document. The New England scallop example fails to mention that the Canadian scallop fishery rebuilt before the American fishery, without the use of any protected areas. The Canadians simply reduced fishing effort, a traditional fisheries management tool. Any increase in abundance outside of the reserves in the US due to larval transport as likely to be from the Canadian scallop stocks as the US stocks inside the reserves. Further the major benefit to fishermen from the Georges Bank scallop example is that they were allowed to fish inside the area that had been closed – not exactly an outcome fishermen could expect in Marine Reserves.

Regarding the current debate in the US, there are almost certainly significant biodiversity benefits of establishing Marine Reserves, but there will likely be short term and in many cases long term costs to fishermen. Further there are potential negative biodiversity impacts in areas that will receive effort displaced from reserves. Neither the video nor the brochure address these potential costs.

Some Observations on the Pew Commission Report
By John Lagrange

Having read the Pew Commission Report I am left with the impression that it was prepared with a rather narrow pre-conceived conclusion in mind. Those of us in the fishing industry are not surprised that the report paints a bleak picture of the nations fisheries and proposes drastic changes in fisheries management. Unfortunately any information that goes counter to that conclusion has been conveniently left out of the report. An uninformed reader would come away from the report without any idea that a large number of our fisheries are in good condition. Nor would he know anything about the many stocks that have been, or are being, rebuilt, using traditional fisheries management methods. I cannot help but think that an equal amount of money and time given to an equally qualified group of professionals of a slightly different mind-set would have produced quite a different report.

Of course there are real problems in our fisheries. There always have been and probably always will be. But this does not justify excluding any mention of the successes that are out there. There is scant mention of fish stocks that have been fished sustainably for many years, such as; Halibut, Black Cod, Salmon and Pollack in Alaska, squid, anchovies, mackerel, lobster, crab, herring, tuna and swordfish here on the west coast. Nor is there much discussion of stocks that have recovered or are currently increasing such as sardines and white sea bass on the west coast or striped bass, scallops and the ground fish species off New England. In fact, the number of overfished stocks in U.S. fisheries is currently declining . One of the stocks recently classified as recovered is scup in the Atlantic. The report, choosing to ignore this fact, uses scup as an example of the failure of current fisheries management.

When an exercise such as this report ignores such a large part of the picture, one must question not only the validity of the conclusions but also the motivation behind it. Convincing the American public that commercial fishing has caused a crisis in the oceans is a long term goal of the Pew trust. Most of us in the fishing industry will view this report as just another chapter in that campaign.

