

SCIENTIFIC STATISTICAL COMMITTEE COMMENTS ON
FEDERAL WATERS PORTION OF THE CHANNEL ISLANDS NATIONAL MARINE
SANCTUARY

The Scientific Statistical Committee (SSC) received a report from Mr. Chris Mobley, Sanctuary Manager, on the status of the working document being developed as a draft Environmental Impact Statement (EIS) to implement a network of marine reserves and conservation areas within the federal waters portion of the Channel Islands National Marine Sanctuary (CINMS). Currently, the CINMS has a network of marine reserves inside California State waters (within 3 nm of the islands). This document addresses the sanctuary's proposal to extend the current reserve boundaries to federal waters and revise the schedule for submission of a draft EIS. To facilitate the ability of the Council's Ad Hoc Channel Islands Marine Reserve Committee to meet this schedule, the SSC Marine Reserves Subcommittee is prepared to schedule a meeting with CINMS and their analysts later this summer. The purpose of this meeting would be to provide a more thorough review of the working draft and supporting documents.

The SSC notes that the goals and purpose statement has been considerably revised from the goals used by the Marine Reserves Work Group (MRWG) to establish reserves in state waters at CINMS. In the current draft, the principal justification has been shifted away from a focus on ecosystem and fishery benefits to a more exclusive focus on protection of the ecological communities and processes, biodiversity, and physical and biogenic habitats within the sanctuary. This shift in emphasis is more aligned with the goals of the National Marine Sanctuaries Act.

The SSC recognizes that this is a working draft with a number of sections incomplete.

The SSC offers the following suggestions to strengthen the document:

1. The need and rationale for extending the state-approved marine reserves into federal waters should be highlighted and moved into the introduction, which is the purpose of the proposed action.
2. The development of the three alternatives and their rationales need to be better explained and justified. The differences among the alternatives appear to be largely a matter of spatial extent of closures, but the document offers little guidance on how to evaluate the alternatives in their ability to achieve the objectives.
3. A table that ranks the effectiveness of each alternative in achieving each of the goals bulleted in Section 1.3 (page 7) should be included.
4. The level of fishing activity within CINMS may have changed, since state reserves were established in 2003 depending on the extent to which displaced effort left CINMS waters. If information is available regarding the extent of such displacement, this information should be used to formulate a new socioeconomic baseline for the analysis of alternatives. At minimum, uncertainty regarding the baseline should at least be acknowledged.