

From: Dan Toomey [dan@anacapa.biz]
Sent: Wednesday, June 16, 2004 9:05 PM
To: Randy Fry
Subject: Talking point re CINMS for PFMC
Hey Randy,

If you get a chance to make a statement regards the CINMS at the PFMC meeting it would be great if you could raise the following points:

- 1) The recreational fishing community is firmly opposed to any change in the Sanctuary's designation that would allow them to engage fisheries management. The Sanctuary has neither the skills, resources nor the expertise to make proper determinations with respect to fisheries.
- 2) The recreational fishing community is firmly in favor of leaving the management of fisheries within the sanctuary to the PFMC and CA DFG.
- 3) The Sanctuary has stated that its current push for no-take reserves is based upon the work done by California in its MRWG process. This process was an utter failure and ultimately failed to reach a definitive conclusion. The Rec Fishing Community does not believe that the blanket no-take reserves called for in the State's Alternative should be treated as credible - the plan was developed through a deeply flawed process (for your reference I have attached NOAA's analysis of the State's process and its shortcomings authored by Professor Mark Helvey - "Seeking Consensus on Designing Marine Protected Areas: Keeping the Fishing Community Engaged").

The State's process was a case study in what shouldn't be done and it shouldn't be built upon. The simple fact is that the State failed to develop a sound scientific basis for its preferred alternative. This issue was addressed directly by the Pacific Fishery Management Council in its July 15, 2002 letter to Mr. Robert C. Hight, Director, California Department of Fish and Game. In this letter the PFMC makes the following comments with regard to the species that inhabit the proposed reserves:

"The SSC notes, due to the relatively small scale of the CINMS relative to the full distribution of most of the fishery resources that inhabit the CINMS, substantial fisheries benefits on a stock-wide scale are unlikely to result under any of the MPA alternatives at CINMS. More specifically, the SSC notes the arguments for expected fisheries benefits (pp. 6-66, 6-67 and Figure 6-1) are technically weak and not compelling."

- 4) The recreational fishing community requests that the PFMC perform a thorough peer review of any analysis submitted by the CINMS Sanctuary Staff in its EIR
- 5) The CINMS Sanctuary Staff has not maintained a neutral position in facilitation of community involvement during their abridge process. The Staff asserted that the passing of the executive for MPA's by president Clinton in the Sanctuary made them stakeholders. They are pushing create no-take marine reserves and have biased all input processes towards this goal. This is readily apparent in the Recreational Fishing representatives to the Sanctuary Advisory Council. Both the current recreational fishing representative and have expressed grave reservations about their ability to adequately represent our community. Both have stated that they are not comfortable advocating against no-take marine reserves and acknowledge that their views differ from those they supposedly represent.
- 6) The socio-economic data presented by the Sanctuary Staff to date is deeply flawed and severely understates the value of consumptive activities while overstating the value of non-consumptive activities in the Sanctuary. This short coming must be addressed before any decision can be made.
- 7) The Federal waters of the Sanctuary are among the most heavily regulated in the world. Currently, the PFMC and CA DFG have enacted closures affecting the entire reserve. The area is a Marine Managed Area already and there is no need for further protection.

I think that should be enough, please let me know how it goes!