



September 29, 2004

Dr. Donald McIsaac
Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Re: Channel Islands Marine Protected Area Process

Dear Dr. McIsaac:

On behalf of the over 300,000 California members and activists of NRDC (Natural Resources Defense Council), I am writing to offer comments on the "Staff preliminary working draft document for consideration of a network of marine reserves and marine conservation areas within the Channel Islands National Marine Sanctuary".

As you know, NRDC has been involved with the Channel Islands MPA process for many years, from when local sportfishermen first proposed the idea to the California Fish and Game Commission. It is appropriate that the process be open and deliberate, so that there can be ample public input as review. We appreciate the work that Sanctuary staff have done with this preliminary document and their many presentations to the Council and discussions with Council advisory bodies. We believe it is now appropriate for the Sanctuary to prepare a full Draft Environmental Impact Statement, and we ask the Council to support this action.

Since the release of the preliminary draft earlier this year, Sanctuary staff have received additional alternatives for analysis, as well as detailed comments from the SSC. The document should be updated to reflect new input and improved analyses. We see no need for an additional preliminary document, but would prefer the detail of a full DEIS. The DEIS format, including a full range of alternatives, would facilitate the next round of review by providing valuable information the Council needs to make a reasoned decision about a preferred alternative. We recommend the Council direct the Sanctuary to prepare a DEIS by May 2005.

Sincerely,

Kate Wing
Ocean Policy Analyst

Karen Garrison
Co-Director, Oceans Program Initiative