

ACSF Comments on MBNMS Research "Needs"
May 2008

The Sanctuary asserts a research need. While we agree that research is one of the most legitimate purposes of MPAs, we find the Sanctuary's rationale for additional MPAs for this purpose to be unconvincing. In fact, we point out that the Sanctuary, in creating their need statement, never even consulted with their own Research Advisory Panel, a group of approximately 20 respected scientists from all of the Monterey Bay Region's research institutes, that meets on a regular basis. They were never asked for their opinions about research needs in the Sanctuary. Perhaps MBNMS officials should be asked why.

Further, we point out that the Sanctuary did virtually nothing to do any of its own monitoring or research on the two State Marine Reserves in the Sanctuary Region during its first 14 years of existence.

Finally, we point out that regarding the list of research questions listed in the April 15th letter, the letter does not address specifically how these questions can be answered by existing MPA opportunities. There are now 29 State MPAs within the region. The new State MPAs in our region include some very deep water in and along the edges of Monterey Bay Canyon. Additionally, research could be conducted on the Essential Fish Habitat Area to document the effects of bottom trawling on similar habitats. The RCA also provides research opportunities. And, of course, we should not forget that the National Marine Sanctuary came to the Council with a request that the very large Davidson Seamount Area be made essentially a benthic reserve, with no bottom extraction at all within 1000 feet of the top of the Seamount. This covers a 775 square-mile area. The Sanctuary gave both research and intrinsic value arguments for asking the Council for this protection. Finally, the new federal waters Channel Islands National Marine Sanctuary MPA was also created to provide research opportunities to the Sanctuary Program

In short, there is little evidence provided in the April 15th MBNMS rationale statement about why additional MPAs are needed for research. There is also no discussion about the MBNMS's research capabilities. Not only has the MBNMS not answered the question: "How much protection is enough?" - they have also not answered the question: "How many research opportunities are enough, especially if they come at a cost of removing fishing opportunities from struggling local fisheries?"