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May 15, 2008

Chair Hansen and  
Members of the Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

RE: Support for Use of Marine Protected Areas as an  
Ecosystem Management Tool in the Federal Waters of the  
Monterey Bay National Marine Sanctuary

Dear Chair Hansen and Members of the Pacific Fishery Management Council:

Please accept the following comments in support of marine protected areas (MPAs) in the federal waters of the Monterey Bay National Marine Sanctuary (MBNMS) on behalf of Ocean Conservancy, World Wildlife Fund, Save Our Shores, Monterey Coastkeeper, The Otter Project and American Cetacean Society's Monterey Bay Chapter.

Our organizations have been strong supporters of the National Marine Sanctuary Program for many years and we have been deeply involved with the program at both the national and individual sanctuary level. Some of our organizations have been integrally involved in the successful MPA efforts in both the Florida Keys and the Channel Islands sanctuaries as well as California's efforts under the Marine Life Protection Act (MLPA). Based on our experience with MPAs and with the National Marine Sanctuary Program and our involvement in MBNMS management, we believe that the MBNMS would benefit from adoption of federal water MPAs that build upon and leverage the recent accomplishments of the State of California under the MLPA.

Adoption of MPAs was the top priority identified by the public during the scoping period of the Sanctuary Program's Joint Management Plan Review (JMPPR) process. In response to this strong public support and to a growing scientific and policy literature outlining the value of marine protected areas as an important ecosystem management tool, in 2001, the MBNMS convened an MPA working group that included several fishermen and harbor masters as well as representatives from scientific institutions and conservation organizations. Several of our organizations participated in this working group.

The Sanctuary's MPA working group developed an Action Plan that was unanimously adopted by the Sanctuary Advisory Council in 2003 at a public hearing in Santa Cruz where more than 200 members of the public testified – the vast majority in favor of stronger Sanctuary protections. Considerable progress has already been made under the MPA plan which is expected to continue to serve as the basis for the Sanctuary's MPA planning process in the future.

Public support for federal water MPAs within the MBNMS was reaffirmed at the December 2007 Sanctuary Advisory Council meeting in Monterey where more than two dozen local residents spoke in favor of such protection. The Sanctuary also received several thousand written comments urging adoption of federal water MPAs during a comment period earlier this year.

Our organizations support the ecosystem management objectives for MPAs in federal waters of the MBNMS outlined in the Sanctuary's April 15, 2008 Rationale Document provided to its Advisory Council:

- Preservation of unique and rare areas in their natural state for the benefit of future generations;
- Preservation of areas where species and habitats are maintained and/or restored for the purpose of ecosystem protection;
- Designation of research areas to differentiate between natural variation versus human impacts to ecological processes that will contribute to better management decisions.

These ecosystem management objectives are closely aligned with the statutory goals of the National Marine Sanctuaries Act and are critical to the successful long-term management and protection of MBNMS resources and qualities.

It is our understanding that the MBNMS' MPA process will include a review of how fisheries based closures like the Rockfish Conservation Areas and Essential Fish Habitat can contribute to partial accomplishment of the MBNMS' management objectives for federal water MPAs. We believe that it may be appropriate in some cases to leverage existing fisheries management measures to help contribute to meeting sanctuary ecosystem protection objectives and we anticipate exploring this issue further as the process unfolds.

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We look forward to working with the Office of National Marine Sanctuaries, the Pacific Fisheries Management Council and NOAA Fisheries as well as members of the fishing community, scientists, other conservation interests and the public to advance this important issue.

Thank you for your consideration of these comments.

Sincerely,

Kaitilin Gaffney  
Ocean Conservancy

Steve Shimek  
The Otter Project & Monterey Coastkeeper

Laura Kasa  
Save Our Shores

Mike Osmond  
World Wildlife Fund

Carol Maehr  
Monterey Bay Chapter,  
American Cetacean Society

cc: Dan Basta, Office of National Marine Sanctuaries  
Paul Michel, Superintendent of the MBNMS  
Congressman Sam Farr