

**Alliance of Communities for Sustainable Fisheries**  
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December 1, 2003

Stephanie Harlan, Chair, Sanctuary Advisory Council  
Bill Douros, Superintendent  
Monterey Bay National Marine Sanctuary Advisory Council  
299 Foam Street  
Monterey, CA 93940

Dear Chair Harlan and Superintendent Douros,

We are writing to express our qualified support for the Special MPA workplan that will be considered by the Sanctuary Advisory Council on December 5, 2003. We also want to provide some background information which we greatly hope the members of the Sanctuary Advisory Council will read thoroughly.

A total of seven Alliance members participated in the SMPA workgroup to develop this draft plan. The workgroup effort began with what appeared to be an assumption that there would be additional MPAs supported by and placed within the Sanctuary, and the workgroup process is one in which the location and size would be identified. Through a large effort by all involved, the workgroup effort shifted to address a concern that it be more of a fair scientific inquiry as to the need, if any, for additional MPAs within the Sanctuary, and fairly evaluate both potential benefits and potential harms that might occur from these MPAs. You should be aware that there are still elements of the plan which make us nervous, such as the goal statement which seems overly broad, and the lack of identification of the role and authority of the Sanctuary Program. However, it was in the desire to constructively move forward that the Alliance members voiced their consensus, but importantly, at the lowest level of comfort for the final workgroup plan.

In addition to the contribution of individual Alliance members, the Alliance does formally also give its guarded endorsement for this workplan. We request that our level of endorsement be passed on at every stage of decision-making as this draft plan moves through the Sanctuary Program and NOAA towards adoption. We do not want to have our consensus statement characterized as fishermen being "wildly supportive" of MPAs or this process.

You should also be aware that the fundamental basis for our support of this plan is to provide the Sanctuary Program a sound method of commenting to the appropriate state and federal agencies on the MPA issue. Any comments would, of course, come from the perspective of the goals of the Sanctuary Program, and after consulting with our industry, but they would be just that – comments. It has never been intended by the Alliance or its members that the Sanctuary Program take a leadership role in the MPA question. Further, in the scenario that the Sanctuary would ever want to use its own authority to create a fishing regulation, then a change in the Designation Document of the Sanctuary would be required. For fishermen to support such a change in the Designation Document, there would need to be ample evidence that the change would be good for them, and that the change would not lead to unintended consequences. Short of that, the fishing community is likely to actively resist any effort to change the Designation Document, as we believe it contains the inherent promise made to us that the Sanctuary would not regulate fishing or be in fishery management.

It was understood from the beginning of the SMPA workgroup process that the effort would be focused mostly on establishing MPAs for conservation, biodiversity, and science study goals. However, a point that was raised numerous times was that even if established for such goals, MPAs will have inherent and significant fishery management implications. In fact, the most current science available now shows what fishermen have intuited for awhile, that because MPAs essentially just shift fishing effort from one area to another, overfishing the outside areas, which includes damage to spawning and recruitment cycles, is a

distinct possibility. The irony of this is huge, as it could be that permanent MPAs, unless carefully sized and placed, could actually have a net overall negative consequence on the environment. More critical thinking within the science community needs to occur before the MPA experiment is conducted to any great degree. We predict that there will continue to be a place for MPAs in the toolbags of both the fishery manager and the conservationist. However, the actual application of this tool will be very specific and limited if it is to stay in the positive environmental realm.

As background to these concerns, and for the SAC's knowledge of current MPA thinking, we have attached three short articles that recently appeared in the publication of the Ecological Society of America. These articles generally address the question "Marine Reserves: the best option for our oceans?" Also attached is a letter dated March 8, 2002, responding to a number of Alliance members participation in a forum on MPAs held in Portland, Oregon. This letter still serves as a good summary of fishermen's questions and concerns about the use of MPAs from a biological, social, economic, and even ethical perspective. We hope that SAC members will give all of these attached documents a careful review

Sincerely,

Mike Ricketts, Co-Chair, ACSF

Kathy Fosmark, Co-Chair, ACSF

Supporting Associations & Organizations

Pacific Coast Federation of Fishermen's Association  
Port San Luis Commercial Fishermen's Association  
Morro Bay Commercial Fishermen's Association  
Monterey Commercial Fishermen's Association  
Fishermen's Association of Moss Landing  
Santa Cruz Commercial Fishermen's Marketing Association  
Half Moon Bay Fishermen's Marketing Association  
Fishermen's Alliance  
Western Fishboat Owners Association  
Ventura County Commercial Fishermen's Association  
Federation of Independent Seafood Harvesters  
Golden Gate Fishermen's Association  
Port San Luis Harbor District  
City of Morro Bay Harbor  
City of Monterey Harbor  
Moss Landing Harbor District  
Santa Cruz Port District  
Pillar Pt. Harbor, San Mateo County Harbor District  
C: The Honorable Sam Farr  
The Honorable Anna Eshoo  
The Honorable Lois Capps  
Admiral Conrad Lautenbacher, USN (ret.)  
Dr. William Hogarth, National Marine Fisheries Service  
Don Hanson, Chair, PFMC  
Enclosures