

Member/Alternate

**Tourism**

Jeanette Webber

**Business**

Michael Hanrahan

**Recreation**

Jim Brye/Eric Kett

**Fishing**

Harry Liquornik/Eric Hooper/Merit McCrea

**Education**

Craig Taylor/Kathy deWet-Oleson

**Research**

Dr. Robert Warner/Dr. Daniel Brumbaugh

**Conservation**

Linda Krop/Greg Helms

**Public At-Large**

Jon Clark/Richard Holt

**Public At-Large**

Robert Duncan/Avie Guerra

**Public At-Large**

Dr. Matthew Cahn/Roberta Cordero

**National Marine Fisheries Service**

Mark Helvey/Christina Fahy

**National Park Service**

Gary Davis

**U.S. Coast Guard**

Lt. Jerrel Russell/Troy Rentz

**Minerals Management Service**

Drew Mayerson/Dr. Fred Piltz

**U.S. Department of Defense**

Alex Stone/Walter Schobel

**California Department of Fish and Game**

Marija Vojkovich/John Ugoretz

**California Resources Agency**

Brian Baird/Melissa Miller-Henson

**California Coastal Commission**

Rebecca Roth/Gary Timm

**County of Santa Barbara**

Dianne Meester/Jackie Campbell

**County of Ventura**

Lyn Krieger/Jack Peveler

**Channel Islands Nat'l Marine Sanctuary**

Chris Mobley

**Monterey Bay Nat'l Marine Sanctuary**

William Douros/Sean Morton

**Gulf of the Farallones/Cordell Bank**

Nat'l Marine Sanctuary

Edward Ueber

**Chair**

Dr. Matthew Cahn

**Vice Chair**

Jon Clark

**Secretary**

Jeanette Webber

# Sanctuary Advisory Council

CHANNEL ISLANDS NATIONAL MARINE SANCTUARY

February 3, 2003

Mr. Dan Basta, Director  
NOAA National Marine Sanctuary Program  
1305 East-West Highway  
Silver Spring, MD 20910

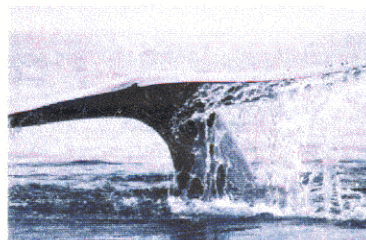
**Re: Channel Islands Marine Reserves**

Dear Mr. Basta:

On January 17, 2003, the Channel Islands National Marine Sanctuary Advisory Council ("SAC") voted to urge NOAA to initiate consideration of the federal portion of the Channel Islands Marine Reserves forthwith, rather than waiting for the review process for potential boundary expansion of the Channel Islands National Marine Sanctuary. At its January 17 meeting, the SAC expressed serious concerns about the delay in implementing the full Channel Islands marine reserve network, and the illogical partnering of a marine reserve system proposed for the existing Sanctuary boundary with a proposal to expand the Sanctuary into a new geographic area. For the reasons set forth below, the SAC urges NOAA to proceed with separate consideration of the Channel Islands marine reserves, with the possibility of joining this process to the Management Plan Update or boundary expansion in the future if no further delays will result.

The following summarizes the concerns expressed at the January SAC meeting regarding the proposal to defer the marine reserves issue to the boundary expansion proposal:

**1. The marine reserves proposed for the Channel Islands rely upon an integrated network of reserves that encompasses 25% of the entire Sanctuary area, in order to ensure adequate representation and connectivity of the various habitat types and features.** The portion of the reserves approved for state waters includes approximately 10% of the entire Sanctuary; the remainder of the reserves, located in federal waters, are necessary to ensure adequate protection of the ecosystem and to provide a solid foundation for species recovery. Half a reserve will not be as effective as the entire reserve network, will not respond to the need for species and ecosystem protection, and will not provide a valid basis for accurate monitoring and evaluation. Importantly, the resources at risk may be harmed by further delay.





The state portion of the reserves was not intended to stand alone; the only reason it was separated from the federal portion was a result of the jurisdictional boundaries between the state and federal waters. From a scientific and ecosystem point of view, however, the marine reserve network must function as a whole, necessarily encompassing both state and federal waters. If the federal portion of the marine reserves is delayed for a few years, the system will not function appropriately and it will be impossible to accurately measure its success or failure.

**2. By delaying the consideration of marine reserves, the Sanctuary program will be viewed as withdrawing its commitment to the community, which began in 1999 with the formation of the SAC and the Marine Reserves Working Group.** At that time, we thought the entire marine reserves process would take approximately two years. Now it is four years later and although we have a portion of the reserves approved by the state, we are still waiting for the federal process to begin. We believe that it is critical for the Sanctuary program to fulfill its commitment to the community to complete the process in an expeditious manner.

**3. In addition, for the last two years, the SAC has identified marine reserves as one of its top two priorities.** It is important for NOAA to support the time and hard work expended by the SAC on this issue. It has been a year and a half since the SAC forwarded its recommendations and the work of the Marine Reserves Working Group to the state and federal agencies. Now that the state portion of the process is complete it is appropriate to initiate the federal portion. Waiting an additional year or more undermines the momentum necessary to keep all concerned constituencies involved, and sends a message that the national program finds the local stakeholder process unimportant.

**4. We are also concerned that there is no logical relationship between the proposed marine reserves and the boundary expansion review.** From the beginning, the Sanctuary program has informed the public and stakeholders that marine reserves would be considered only for the *existing* Sanctuary boundaries, and not for any potential expansion area. Based upon that understanding, a broad representation of stakeholders came to the table and spent three years developing recommendations for goals, objectives, and implementation measures, and proffered a range of spatial alternatives for siting reserves. **If the federal reserves process is integrated with a consideration of boundary expansion, the public will be confused.** The Sanctuary program and the SAC will have a difficult time convincing the public and stakeholders that marine reserves are only being considered for the existing Sanctuary boundary when the issue is tied to a project that is *solely focused* on expanding the existing Sanctuary boundary. Not only will the public be confused, but the integrity of the SAC and Sanctuary process will be compromised. Throughout this process the public, especially fishing interests, were reassured that marine reserves and boundary expansion would be handled as separate issues. Combining these processes at this point would be perceived as an act of bad faith on the part of NOAA.

**5. There is no reason for delay.** The Sanctuary program has the benefit of all the information from the Marine Reserves Working Group and the California Fish and Game Commission processes. The environmental document for the state portion of the reserves includes information, analysis, and alternatives for both the state and federal portions of the reserves. Although the Sanctuary's consideration of the federal portion may include additional alternatives, the underlying data and information are already available to make such assessment in a timely fashion.

**6. Finally, moving forward with the federal portion of the marine reserves now will not prevent NOAA from joining the reserves to the Management Plan Update in the future if appropriate.**

Based upon the foregoing, and by the attached vote, the SAC respectfully requests that NOAA continue the process already underway by expeditiously initiating review of the federal portion of the Channel Islands Marine Reserves. Please complete the process of establishing a meaningful network of marine reserves around the islands. Continue separate review of marine reserves, and leave open the potential for joining processes in the future if it will not delay either the marine reserves or the Management Plan Update.

Thank you for your consideration of our concerns and recommendations, and for your support of the Channel Islands National Marine Sanctuary.

Respectfully,



Dr. Matthew Cahn, Chair  
Sanctuary Advisory Council  
Channel Islands National Marine Sanctuary

cc: Chris Mobley, Manager, Channel Islands National Marine Sanctuary

enclosure



**January 17, 2003**

**Channel Islands National Marine Sanctuary Advisory Council – Voting Results**

Voting results on a motion to send a letter to the National Marine Sanctuary Program expressing concerns about a possible merger of the federal marine reserves process with a future supplemental environmental impact statement on boundary expansion.

<b>SAC Seat</b>	<b>Representative</b>	<b>Vote</b>
Tourism	Jeanette Webber	YES
Recreation	Jim Brye	YES
Business	Michael Hanrahan	YES
Conservation	Linda Krop	YES
Fishing	<absent for vote>	--
Education	Craig Taylor	YES
Research	Dr. Robert Warner	YES
Public At-Large 1	Jon Clark	YES
Public At-Large 2	Avie Guerra	YES
Public At-Large 3	<absent for vote>	--
National Marine Fisheries Service	Mark Helvey	Abstain
National Park Service	Gary Davis	YES
United States Coast Guard	<absent for vote>	--
Minerals Management Service	Drew Mayerson	YES
US Department of Defense	Alex Stone	YES
California Resources Agency	Melissa Miller-Henson	YES
California Department of Fish & Game	John Ugoretz	Abstain
California Coastal Commission	Gary Timm	YES
Santa Barbara County	Jackie Campbell	YES
Ventura County	<absent for vote>	--