



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL OCEAN SERVICE

Monterey Bay National Marine Sanctuary  
299 Foam Street  
Monterey, California 93940

January 31, 2007

Mr. Michael Flores  
President  
California Fish and Game Commission  
1416 Ninth Street  
Sacramento, Ca. 95814

Re: Monterey Bay National Marine Sanctuary comment on the Marine Life Protection Act Preferred Alternative

Dear Mr. Flores,

The Monterey Bay National Marine Sanctuary encompasses a large portion of the MLPA's Central Coast Study Region extending 276 miles from the Marin Headlands in the north, to Cambria in the south. Sanctuary staff have appreciated the opportunity to be active participants in the current effort to designate marine protected areas (MPAs) on the central coast. The mandate of the MLPA to protect the marine ecosystem while maintaining the opportunity for sustainable use parallels our own under the National Marine Sanctuaries Act. The current initiative has the potential to be a critical step in achieving those mandates and represents an opportunity to create a lasting milestone in effective marine conservation and management.

We would like to again commend the Department and MLPA Initiative staff on engaging in a tremendously public and open process that incorporated the perspectives of a wide range of stakeholders, and tapped the expertise of an impressive scientific advisory team. With stakeholders, scientists, Blue Ribbon Task Force members, the Commissioners and the public at large all contributing to the initiative, an unprecedented amount of community time and effort has gone into creating the package that the Commission adopted in August.

Overall the package that the Commission adopted does a good job of striking a balance between package 1 and 2R, and represents an effective MPA network that allows for fishing to continue. However, we strongly recommend that the Commission view this package as the compromise that it is and not weaken it by choosing sub-options that would further undermine resource protection.



We would like to also recommend that one change be made to strengthen the package in a critical way, which is prohibiting the take of pelagic prey species such as sardine and anchovy at Portuguese Ledge in Monterey Bay.

These species are a critical part of the trophic structure providing a food source for countless marine species including seabirds, marine mammals, and fish. By protecting their role in the ecosystem at this location it could significantly benefit the more resident benthic species in the area such as rockfish. Prohibiting the take of pelagic prey species here would also provide an opportunity to understand the trophic linkages between benthic and pelagic species through comparison to a similar proposed site in Monterey Bay, Soquel Canyon, where the take of pelagic prey species could be allowed. This is a connection that is not well understood and the network could provide an opportunity to understand this important ecological link.

The socioeconomic impact of disallowing pelagic prey species at Portuguese Ledge would be limited. The boundaries in Package P have changed somewhat, but they are still similar to 3R where the Portuguese Ledge area represented less than 1% of each of the fishing grounds for squid, anchovy and sardine. Additionally, while these species are an important forage base for the resident species in the area, they also quickly pass through. Fishing effort could therefore shift outside the MPA boundary without an effect on catch.

Again, we encourage the Commission to rely on the process that has led us to this point and not choose sub-options that would undermine the value of the MLPA on the central coast.

Thank you for the opportunity to comment on what will be a historic initiative. If you have any questions please contact Holly Price at 831-647-4247.

Sincerely,



Karen Grimmer  
Acting Superintendent