Public Comment to the California Ocean Protection Council
General Comments: September 8, 2006 – November 27, 2006

Date	Name	Affiliation	Subject of Communication
9/13/2006	Tom and Sheri Hafer	NOAA Fisheries	Proposed fisheries resolution
9/16/2006	Peter Halmay		Proposed fisheries resolution
9/16/2006	James B. Ruch		Proposed fisheries resolution
9/18/2006	Marty Golden	NOAA	Proposed fisheries resolution
9/18/2006	Rob Kraencke	Commercial Fisherman	Proposed fisheries resolution
9/18/2006	Lucky50		Proposed fisheries resolution
9/26/2006	Diane Trujillo Carrillo		Proposed fisheries resolution
9/26/2006	Margaret Connors	NCEAS Outreach Coordinator UC Santa Barbara	Proposed fisheries resolution
9/26/2006	Harriet Mitteldorf		Proposed fisheries resolution
9/27/2006	Lance E. Morgan	Chief Scientist Marine Conservation Biology Institute	Proposed fisheries resolution
10/2/2006	Marshall Krupp	Director, Orange County Ocean Foundation	Proposed fisheries resolution
10/2/2006	Harry Wong	President, Northern California Oceans Foundation	Proposed fisheries resolution
10/5/2006	Barbara Stickel	F/V Regina	Proposed fisheries resolution
10/6/2006	Oscar Pena	Board of Port Commissioners	Proposed fisheries resolution
10/16/2006	Tracy Egoscue	Santa Monica Bay Keeper	Proposed fisheries resolution
11/21/2006	Julie Thayer	PRBO Conservation Science	Proposed fisheries resolution
11/22/2006	Rodney R. McInnis	NOAA	Proposed fisheries resolution
11/24/2006	Tim Eichenberg et al.		Support of the Joint Management Plans for the Monterey Bay, Gulf of the Farallones and Cordell Bank National Marine Sanctuaries

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11/27/2006	Steven Gaines et al.		Statewide Marine Protected Area (MPA) Monitoring Institution and Research and Monitoring Priorities
11/27/2006	Joel Greenberg	Recreational Fishing Alliance	Support for grant funding for AGP video
11/27/2006	Sarah Abramson Mark Gold	Heal the Bay	Central Coast Marine Protected Area (MPA) Monitoring, CA Coastal & Marine Mapping Initiative, OPC/DFG Joint Work Plan, Implementation of MLMA and MLPA

From: Tom Hafer
Sent: Wednesday, September 13, 2006 8:07 PM
Subject: MLPA Comments: Coordination with STAR panel recommendations

Cabezon make up a large percentage of the commercial nearshore fishery on the Central Coast (or at least it used to before the current quotas). In the stock assessment done thru NOAA, they made specific recommendations of the type of information they needed to better understand the status of the species. I am inserting their report at the end of this letter. ***I want you to notice there is no information the STAR panel recommended that can be collected by scuba surveys***. Yet, the Ocean Protection council is putting most of their money towards CRANE and SiMON which mainly focus on diver surveys and swatch collections, and CalFi that focuses on water quality, temp, and other non relevant information for stock assessments. Maybe this is why there is only 4 of the 19 nearshore species evaluated since the current data collection routines are not getting the necessary information. And now with most of the dependant data skewed with quotas, it is even more important to get independent data collections that are as representative of the **cryptic** nearshore stock as possible. Trap and hook and line tagging studies with commercial fishermen are more accurate for Catch Per Unit Effort research and also give the scientist the ability to study DNA, gender ratios, spawning patterns, movement patterns, etc. We feel this data should be collected prior to the implementation of the MPA's as well as do many scientist involved with ecosystem adaptive management. There are many different areas along the coast with different types and abundance of marine habitat and species. You MUST get baseline information FIRST!!!!!. CEQA should require it if they aren't biased towards pushing this thru like many others. Otherwise you are rushing into this process and will never be able to truly know the results of taking hundreds of miles of ocean from public access. Really, as far as you know, the state waters may be as healthy as it has ever been. What are your key indicators? Top predators - the sea lions, whales, porpoises, and yes otters are all increasing in numbers. The forage- squid, anchovies, and other wet fish are here in abundance. The birds are vast. The stock assessments that have been done are healthy. What are MPA's going to do? Where is the problem? You need to identify it before the MPAs go in. This is why you don't have the support of the fishing community. If you started collecting data that made sense to the fishermen and helped more accurately identify the problem with current fishing practices, if there is one, we would better support your efforts.
Tom and Sheri Hafer

Cabezon
STAR Panel Meeting Report
May 16-20, 2005

NOAA Fisheries
Northwest Fisheries Science Center
Seattle, Washington

STAR Panel:
Steve Ralston – NOAA Fisheries, SWFSC (Chair)
Vivian Haist – Center for Independent Experts (outside reviewer)
Bob Mohn – Center for Independent Experts (outside reviewer)

Paul Spencer – NOAA Fisheries, AFSC
Theresa Tsou – Washington Department of Fish & Wildlife

PFMC:
John DeVore – Groundfish Management Team (GMT) representative
Rod Moore – Groundfish Advisory Panel (GAP) representative

STAT Team:
Jason Cope – University of Washington

Overview

The STAR Panel (hereafter the Panel) reviewed the draft cabezon (Scorpaenichthys marmoratus) assessment report, dated May 2, 2005. This document presents the second quantitative assessment of the California cabezon resource, following the initial assessment conducted in 2003. The assessment addressed all recommendations made by the 2003 STAR panel, to the extent possible. This has resulted in some significant modifications to the analysis and data sources.

Major changes for the 2005 assessment include: (1) separate analyses for a northern California (NCS) and a southern California (SCS) sub-stock, (2) use of the new SS2 assessment model (rather than a cabezon-specific model), (3) extension and improvement of historical catch estimates, (4) exploration for evidence of fine-scale spatial structure, and (5) investigation of alternative abundance indices. The analysis separates catch into two commercial fishing fleets (live and non-live) and four recreational fishing fleets (man-made [piers and jetties], shore-based, Private Boat and Rental [PBR], and Commercial Passenger Fishing Vessels [CPFV]). The primary abundance index fitted by the model was the California CPFV logbook catch rate series, standardized through GLM analysis. Additional abundance indices that were investigated in the SCS or NCS model fits were: (1) a Monterey nearshore reef adult survey (NCS), (2) the TENERA nearshore benthic reef survey (NCS), (3) a Southern California Power Plant impingement index (SCS), and (5) a CalCOFI larval index.

A broad range of sensitivity analyses were conducted that adequately encompassed the key axes of uncertainty. These included: (1) uncertainty in the historic catch series, (2) uncertainty in natural mortality (M), (3) sensitivity to inclusion/exclusion of individual data series, (4) sensitivity to stock-recruitment parameters including steepness (h), recruitment variability (sr) and the years in which deviations were estimated, (5) sensitivity to the assumed variance of the length-frequency data (effective N), and (6) the estimated variance of length-at-age.

The Panel commended the high quality of the draft assessment, in particular the thorough and detailed investigation into uncertainties arising from model structure and data. The Panel thanked Jason Cope for his efforts to produce the additional requested runs and data analyses and his cooperation and assistance during the review process.

List of Analyses Requested by the STAR Panel

Discussion after the initial presentation of the cabezon assessment, and review of the results of sensitivity runs (Tables 17, 18, and 19 in the draft report), resulted in the Panel requesting additional analyses to address some particular issues. These were:

Issue 1: For the SCS cabezon sub-stock, exclusion of the 2000 mean catch weight data point for the man-made fleet decreased the high estimate for the 2000 year-class, which then significantly reduced the estimated 2004 spawning biomass. The Panel questioned how inclusion/exclusion of this data point affected fits to the abundance indices and if there was support for this large year-class in other length data sets.

Results presented to the Panel showed that while removal of the 2000 man-made fleet mean weight data point slightly degraded the fit to the 1999 man-made fleet mean weight data point, it's removal had little impact on the other data sets. For the PBR fleet length frequency data, exclusion of the 2000 mean weight resulted in a better fit to the smallest length category in the 2002 observations and resulted in a poorer fit to the smaller length categories in the 2003 observation. That is, the 2002 PBR length data does not support the base case model estimate of the 2000 year-class but the 2003 PBR length data does support the estimate.

The Panel noted that the strong 2000 year-class was generally consistent with all the SCS cabezon data observations and also, that this is consistent with what has been seen in other west coast groundfish species. Thus, the Panel concluded the 2000 man-made fleet mean weight data point should remain in the base case model.

Issue 2: Of all sensitivity runs conducted for the NCS cabezon sub-stock, inclusion or exclusion of the TENERA scuba survey index had the greatest effect on the assessment and estimates of stock depletion. The initial base case model structure did not include this data because the survey represents only a small geographic area and because it is a SCUBA survey that may not consistently record the highly cryptic cabezon. The Panel requested additional model outputs showing fits to the TENERA data, other model data, and biomass trajectories when the model is fit with and without this abundance index. Also the Panel suggested that GLM analyses of the CPFV data, conducted by major port, would be useful to investigate if there is evidence for localized depletion of cabezon.

Model fits to the CPFV data did not show much difference in the fits with and without the TENERA data. The major influence in the TENERA data was in the longer cycle in the abundance trend. That is, inclusion of the data resulted in a smaller initial stock that is currently more depleted.

The port-specific GLM analyses of the CPFV data indicated distinct abundance trends in different localities. In particular, trends in Morro Bay and Monterey showed marked declines in the abundance index between the mid-1970s and mid-1990s. However, CPFV abundance trends in Half Moon Bay and at Big Sur did not show much decline over the 1960-2000 period.

The Panel agreed with the decision to exclude the TENERA data from the base case model structure. This data may be useful if more spatially disaggregated modelling is attempted for cabezon in the future, but localized abundance trends and concern with the consistency of a SCUBA survey limit its value in the current assessment model.

Issue 3: The base case “effective” sample sizes for length-frequency data were, in some instances, extremely large in one or two years (>1500). The concern was that these samples may have exerted too much influence in the model fit. A run that constrained sample sizes for all years within a data series (i.e., a fishery) to be equal, but that iteratively re-weighted the effective sample sizes among data series was requested.

Results showed little difference in the major parameters of management interest (e.g., depletion, terminal biomass). The initial biomass was slightly higher, but not enough to consider this an important sensitivity, or to cause concern with the base case run.

There was discussion about methods to weight “composition” data, given that a variety of methods are currently in use. In general, where there are large among-year differences in the number of samples taken, the actual differences may overestimate the relative precision of the data, although differences in sample size likely do affect precision. A workshop or other process to investigate appropriate weighting methods would be valuable.

Issue 4: Presentation of standardized length frequency residuals (Pearson residual) for the base case run was requested. The Panel wanted to see if the distribution of these were approximate standard normal and if there were extreme outliers.

The residual patterns looked fairly reasonable. That is, there were few extreme (< -4 or > 4) outliers. One very large residual was the result of a single 6 cm fish, which is considerable smaller than any other measured cabezon. This data point should perhaps be eliminated. Another sequence of larger residuals (for a single data set) may suggest down-weighting or removal of that data.

Issue 5: The panel requested a run based on a single sex model structure (single growth curve and natural mortality rate).

There was confusion about the purpose of this request, and as a results, the run that was completed addressed issues related to the reproductive contribution of male cabezon. A single-sex model with two growth morphs was run. This allowed calculation of a spawning stock biomass that included the contribution of male cabezon, and led to a discussion about the importance of nest-guarding male fish to the reproductive output of the stock, and how this might be measured. Future research directed to developing reproduction metrics that include the importance of nest-guarding males would be valuable.

Issue 6: Raggedness in the relationship between steepness and other measures (e.g., 2005 spawning stock biomass) suggested the model may be stopping at local minima. A few

methods that might explore whether some of the minima were local were suggested (smaller steps in the steepness profile, starting the minimization from neighbouring steepness points, etc.).

Results indicated that the estimation had stopped at some local minima. This was not considered to be a major concern for this assessment. Rather it is useful to be aware that local minima issues exist. Documentation of local minima examples would be useful as there may be some generalizations about when they are more likely to be encountered. Profiles of model outputs such as likelihood values, depletion, and spawning biomass across values of a fundamental model parameter (steepness, sigmaR, M, etc.) may be a useful diagnostic to identify local minima issues.

Final Base Model Description

The author suggested the following list of issues requiring resolution to determine the cabezon base case runs: (Panel responses follow in bold)

Base Case Major Issues:

1) One stock or two sub-stock model: Two sub-stocks.
2) Which indices to include: As in the initial base cases (e.g., exclude TENERA survey).
3) Whether RecFIN converted weight data should be used as artificial lengths or mean weights: As in the initial base case (as mean unconverted weights).
4) Inclusion of 2000 mean-weight data point for man-made fleet: Include, but use as an axis of uncertainty for the SCS decision table.
5) Which years to estimate recruitment deviation: As in the initial base case.

The Panel supports the authors' decisions regarding all other aspects of the base case model structure and data. The Panel suggests the following regarding presentation of uncertainty in decision tables:

SCS sub-stock: Results from the base model indicate that depletion (spawning biomass in 2005 ÷ virgin spawning biomass) is estimated to be 28.3%. The strength of the 2000 year-class dominates the uncertainty in stock depletion and 2005 spawning stock biomass, so the Panel suggested it as an appropriate axis for representing uncertainty in current stock status. Variation in the size of the 2000 year-class and in stock depletion can be attained through alternative weighting of the 2000 mean-weight data point (e.g., adjust the CV of the data point). The Panel suggested using weightings that result in depletion levels of 0.2 and 0.35 to bracket uncertainty in the assessment. These depletion levels were based on the analytical estimates of the standard error of the depletion parameter (Hessian approximation at the MPD). The associated probability for the 0.2 depletion level was then twice the cumulative density (CDF) at a depletion of 0.2, where normal distribution was assumed. At the other end of the CDF, the probability associated with the 0.35 depletion level was 1 minus twice the cumulative density at 0.35 depletion.

NCS sub-stock: Base model results indicate that depletion is currently estimated to be 40.1%. Although inclusion/exclusion of the TENERA abundance index series had the largest influence on NCS depletion estimates, the assessment authors suggested, and the Panel concurred, the survey was not likely to be representative of the entire NCS sub-stock. Thus, the Panel suggested that uncertainty in the natural mortality rate would be a useful axis to represent uncertainty for the NCS sub-stock (Female/Male natural mortality rates equal to: F0.2:M0.25, F0.25:M0.3 [base], and F0.3:M0.35). The selected natural mortality rates resulted in a range of estimated 2005 spawning stock biomass that were consistent with the uncertainty in that parameter estimated from the covariance matrix. The process for assigning probabilities to the different states of nature was the same as that used for the SCS sub-stock.

Comments on the Technical Merits and/or Deficiencies in the Assessment

The process of analyzing data for the two California sub-stocks was a considerable improvement on the previous assessment. Using selectivity parameters from the NCS analysis in the SCS model fit was a credible way to deal with the missing data issues. A broad range of sensitivity analyses were conducted, encompassing both data and model structure uncertainty. So, while there is considerable uncertainty in the estimates of historic cabezon catch and this can't be improved, the effect of the uncertainty on the assessment is known.

Explanation of Areas of Disagreement Regarding STAR Panel Recommendations

There were no significant areas of disagreement.

Unresolved Problems and Major Uncertainties

There were no unresolved problems or issues with the current cabezon stock assessment.

Prioritized Recommendations for Future Research and Data Collection

Specific to cabezon assessment:

The Panel supports the research recommendations in the draft assessment document. In particular:

1) Continuation of the fishery independent surveys work in Morro Bay (nearshore trap survey and mark-recapture analysis), and if possible extension of this type of survey to other areas.
2) Sex-specific dynamics are likely important for cabezon. Research to investigate: (a) how best to model male reproductive contributions, and (b) the utility of color to distinguish sexes in catch sampling, would be useful.
3) Age and growth studies, in particular for the SCS sub-stock.

Additionally, the panel noted that while this is a council sponsored stock assessment, it deals on with nearshore California fisheries. If a full coastwide assessment cannot be completed in the future, the assessment document should minimally include summaries of fisheries statistics (e.g., landings, value, etc.) for the States of Oregon and Washington.

Generic for assessments:

In addition to the recommendations specific to the cabezon assessment, the Panel had a number of recommendations that were generic for all assessments. These were:

1) Decision table analysis – the expression of uncertainty for the SCS and the NCS decision table analyses was expressed in different ways. For the SCS uncertainty is conditioned on the size of the 2000 year-class, which results in large uncertainty in current depletion (0.20 to 0.35). For the NCS uncertainty is conditioned on the natural mortality rate, which introduces uncertainty in stock dynamics as well as current status. The Panel believes the different approaches were appropriate to capture key uncertainties in the two cabezon assessments, but suggests that more specific guidance on methods and approaches for bracketing uncertainty would be useful to panelists.
2) Fitting to composition data – the Panel suggests a workshop or other forum to investigate and provide guidance on (a) appropriate methods to determine effective sample sizes, (b) approaches to looking at and interpreting residual patterns, and (c) approaches to dealing with extreme outliers.
3) RecFIN data system – certain improvements to the RecFin data system, possibly the development of a research RecFIN data system, would improve the utility of this data source for stock assessments. Also, investigation of data collection and the data analysis procedures used in the early years of the program may help inform decisions related to the reliability of the data and improve the credibility of this data source.

From: Peter Halmay
Sent: September 16, 2006

Hello COPC public,

In the last sentence you say "Potential projects that could be funded include ....quota systems and limited entry programs"

How does one fund quota systems and limited entry programs?

Did you mean to say "....quota systems vessel buyback programs and limited entry permit buyback programs....."?

Or simply omit "quota systems and limited entry programs," and leave in "vessel and permit buyback programs"

Best, Peter Halmay
phalmay@earthlink.net

From: James B. Ruch
Sent: September 16, 2006

I strongly support sustainable fisheries management. I would like you to please include strong support for recreational ocean fishing in California. This should include support for the harbors, landings, and sport fishing boat owners and skippers who are a vital part of recreational fishing in the ocean. As a former state fish and wildlife agency director (and, incidentally the co-author of the original 1966 California Fish and Wildlife Plan) I believe that no properly managed hook and line recreational fishery has ever harmed or threatened fish stocks or resources. I also believe that recreational fishing is of inestimable value both economically and socially to the people of California. Please include efforts and investments to support ocean recreation fishing in your resolution.

James B. Ruch

Please respond to jimruch@ojai.net or to Jim Ruch, 900 Boardman Rd., Ojai., CA 93023. 805 646 7796

From: Marty Golden
Sent: Monday, September 18, 2006 12:34 PM
Subject: Re: MLPA: Proposed resolution of the California Ocean Protection Council

Would it be appropriate to include recreational fishing in this document?

Marty Golden
[mailto:Marty.Golden@noaa.gov]

From: Rob Kraencke
Sent: September 18, 2006

I read the draft of the announcement: Supporting Innovative Approaches to Sustainable Fisheries Management. As a commercial fisherman that has been affected by recent fisheries management decisions and this is of interest to me. I operate a small hook and line fishing vessel that sells a large portion of my catch directly to the public. Every weekend families come to Pillar Point Harbor to purchase seafood directly from the fishermen. It is evident they get a real sense of connection from this experience and would like to see it continue. I feel I fish in a sustainable manner, but the recent MPLA restrictions are going to make it increasing difficult to maintain a profitable business.
I have applied for a permit to harvest abundant Chilipepper rockfish in the RCA. The goal of this permit is to prove that selective fishing gear and techniques can harvest abundant stocks, while avoiding the stocks that are rebuilding. The process is moving forward, however the requirements being placed on me become too expensive to make this project practical.
Does this project sound like something that is appropriate for the California Ocean Protection Council?

Rob Kraencke
Snappyrob@aol.com

From: lucky50@humboldt1.com
Sent: Monday, September 18, 2006 5:34 PM

As one of Californias few remaining commercial fishermen I would like to add a few comments to your resolution. First the reason for Californias drop in landings in the last thirty years is due to ridiculous environmental regulations aimed at fisheries and fishermen far more strict than any other state or federal guidelines. It is regulations like the Nearshore Fish Management Plan and the Marine life Management Act that cut Nearshore groundfish quotas 95% even though none of the species is listed as overfished. Recent stock assessments put many of the stocks near 70% of unfished biomass. What more could you ask for? Nearly all commercially harvested species are alrady under a limited entry program and/or strict federal and/or State quotas. We've already had a boat buyback program and environmental groups are buying up the few remaining federal permits.
State groundfish permits are 2 for one or non-transferable which can only lead to less permittees not more. The number of commercial fishermen has been reduced from 20,000 to 2000 in the last 25 years.

Problems in the Salmon Fisheries are due to the governments intentional mismanagement of the Klamath River since 1983 and removal of fish hatcheries and has little or nothing to do with fishing. There's plenty of Salmon just not Klamath Salmon but regardless we can't fish them. Our Dungeness Crab stocks are quite healthy and we've seen three back to back record seasons.

To the best of my knowledge all California's commercially harvested species are being fished at or below sustainable levels maybe you can enlighten me as to the overfished species because I'm not aware of any other than a few shelf rockfish and these are federally managed and have a ten mile wide swath of water the entire length of the state closed to all bottom fishing.

While I support the idea in your resolution of preserving fishermen and fishing communities, I don't support the misleading untrue facts leading to your conclusion. Nor due I support any more regulations, boat buybacks, more restrictive quotas, IFQ's or anything else that would further expedite the extinction of the few remaining fishermen in CA. We need less regulations not more.

From: Diane Trujillo Carrillo
Sent: September 26, 2006

To: California Ocean Protection Council

I submit the recommended changes identified below to include "tribal communities" in the document entitled:

Proposed Resolution of the California Ocean Protection Council

Supporting Innovative Approaches to Sustainable Fisheries Management

September 13, 2006 Draft

.....

RESOLVES to promote innovative approaches to sustainable fisheries in California that create economic opportunities for fishermen and local and tribal communities, ensure the long-term health of fish stocks and marine resources, and sustain local fishing harbors; and....

Thank you for your consideration.

Diane Trujillo Carrillo
(916) 804-9290
d.d.trujillo@att.net

From: Margaret Connors
Sent: September 26, 2006

I would like to express my personal support for the proposed resolution of the California Ocean Protection Council seeking innovative solutions to sustainable fisheries. This is important work and I have been particularly impressed with the buy back program currently underway in Northern California.

Margaret Connors
NCEAS Outreach Coordinator
University of California, Santa Barbara
735 State St., Ste. 303
Santa Barbara,, CA 93101
[connors@nceas.ucsb.edu]

From: Harriet Mitteldorf
Sent: September 26, 2006

I support this resolution

Harriet Mitteldorf
Pebble Beach
harriet@redshift.com

From: Lance E. Morgan
Sent: September 27, 2006

Dear California Ocean Protection Council,

I fully support this initiative to fund approaches to sustainable fisheries. I would like to refer you to a report I authored in 2003 title "Shifting Gears: addressing the collateral impacts of fishing methods in U.S. waters". This report identified consensus among scientists, fishermen and conservationists on the ecological severity of different types of fishing gear. The report clearly identified a missing component of fishery sustainability as addressing the impacts of fishing gear. A move towards sustainability should include a move to ecologically safe fishing methods (i.e., limiting bycatch and habitat damage).

Thank you for this opportunity to comment and I sincerely hope your approach to sustainable fisheries will explicitly address impacts of destructive fishing practices.

If you do not have a copy of this report I would be more than happy to send copies to you and your staff.

Sincerely,

Lance E. Morgan, Ph.D., Chief Scientist
Marine Conservation Biology Institute
14301 Arnold Dr., Suite 25
Glen Ellen CA 95442 USA
1 707 938 3214 (office)
1 707 217 8242 (mobile)
1 707 996 4842 (fax)

<mailto:lance@mcbi.org> lance@mcbi.org

<http://www.mcbi.org/>

Orange County Ocean Foundation

SAM

Chairman and Member of the
California Ocean Protection Council
C/o Mr. Mike Chrisman, Chair
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Subject: Recommendation of the Orange County Ocean Foundation

Proposed Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustaining Fisheries Management Scheduled for Consideration by the Council on October 26, 2006

Dear Chairman and Members of the California Ocean Protection Council;

The Orange County Ocean Foundation ("OCOF") has reviewed the September 13, 2006 draft **Proposed Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustaining Fisheries Management** to be heard before the California Ocean Protection Council ("COPC") on October 26, 2006. The OCOF is a California non-profit organization and is part of the California Ships 2 Reefs program. The Mission of the Orange County Ocean Foundation is to promote, support, and expand the recreational opportunities of the Orange County coastal region by voluntarily leading, supporting, participating in, receiving contributions, and providing financial resources to community supported projects that enhance ocean habitat, encourage sustainable use of ocean resources, protect the ocean environment, and enhance the coastal recreational opportunities, economy, and amenities of Orange County."

We are also the proponents of the ***Orange County/Crystal Cove Underwater Marine Educational Laboratory*** proposed as part of the development of an artificial reef system created through a partnership between governmental agencies, local school districts and educational institutions, the scientific community, and the private sector marine and ocean enthusiast.

We note that California's fisheries depend on a healthy marine ecosystem, and that all components need to be maintained to preserve extractive and non-extractive uses. We note also that the Ocean Protection Council Strategic Plan calls for actions that will facilitate a transition to sustainable fishing practices, improve fisheries management in cooperation with the Department of Fish and Game, and preservation of working harbors through investments in infrastructure.

We fully support the proposed Resolution and ask that you consider revising the Resolution as follows:

> "FURTHER RESOLVES to dedicate up to $3 million of existing funds for projects that support sustainable fishing practices. Potential projects that could be funded include expansion of direct-to-consumer seafood markets, local fishing harbor revitalization, cooperative research, funding mechanisms such as the California Fisheries Fund, quota systems and limited entry programs, vessel and permit buybacks, ***the development of sustainable artificial reef systems along the California coast***, and other projects."

It is our belief that the natural reef system which creates the abundant fisheries along the California coast can be enhanced through an artificial reefing system that would generate further healthy marine ecosystems, thereby enhancing all fisheries. For over 25 years, studies have continued to show that environmentally sensitive artificial reefs provide advantageous environments for fish productivity and for restoring biodiversity.

Our recommendation is in full compliance with many of the Goals, Objectives and Actions contained in the COPC's *"A Vision for Our Ocean and Coast – Five Year Strategic Plan – 2006"*.

We ask and encourage you to support the revision of the Resolution to include the concept of sustainable artificial reefs. In so doing, you set the stage for the development of standards, requirements and programs to effectively implement these forms of fisheries, enabling California to be a leader in the future of restoring the abundance of the marine ecosystems.

We appreciate the opportunity to be a part of this important process and want to continue to be involved in the State's activities with regards to the preservation, restoration, and enhancement of the California coastal areas. Please add our name to the list of others to received future announcements, notices, and reports issued by the California Ocean Protection Council, the Secretary for Resources, the California Department of Fish and Game, and the California Coastal Conservancy, particularly as these may affect the Orange County coast.

Notice should be sent to:

Marshall Krupp
Vice President/Director
Orange County Ocean Foundation
3367 Corte Levanto
Costa Mesa, California 92626
ecommunitysvs@earthlink.net
marshall@OCOceanFoundatiuon.com

Please advise us if the October 26, 2006 meeting will be a public hearing to receive comments, and the availability of time to present testimony. Also, advise us of the time and location of the meeting.

Thank you for your assistance and consideration. If you would like us to participate in the hearings in this matter and to offer additional support for our recommendation, please feel free to contact us.

Sincerely,

Orange County Ocean Foundation

Marshall Krupp,
Vice President/Director

MBK:mbk
COPC Resolution Letter 09-27-09

RECEIVED
OCT 02 2006
COASTAL CONSERVANCY
OAKLAND, CALIF.

CC: Governor Arnold Schwarzenegger
State of California
State Capitol Building
Sacramento, California 95814

Mr. Brian Baird
Assistant Secretary for Ocean and Coastal Policy
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Mr. Drew Bohan
Executive Policy Officer
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Ms. Leah Akins
Ocean and Coastal Policy Analyst
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Mr. Sam Schuchat
Executive Officer; Council Secretary
California Coastal Conservancy
11th Floor
1330 Broadway
Oakland, California 94612

Northern California
OCEANS FOUNDATION

September 30, 2006

Chairman and Members of the
California Ocean Protection Council
C/o Mr. Mike Chrisman, Chair
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Subject: Proposed Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustaining Fisheries Management Scheduled for Consideration by the Council on October 26, 2006

Dear Chairman and Members of the California Ocean Protection Council:

The Northern California Oceans Foundation ("NCOF") has reviewed the September 13, 2006 draft **Proposed Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustaining Fisheries Management** to be heard before the California Ocean Protection Council ("COPC") on October 26, 2006. NCOF is a California 501(c)(3) Non-profit Public Benefit Charitable Corporation and is a member of the California Ships 2 Reefs coalition. The Mission of Northern California Oceans Foundation is to promote ocean stewardship by leading, supporting, participating in, receiving contributions, and providing financial resources to projects that enhance ocean habitat, protect and preserve marine ecosystems, encourage sustainable use of ocean resources, enhance ocean water quality, and strengthen the coastal and marine opportunities, economy and amenities of the Northern California Coastline for the benefit of current users and future generations.

We are also the proponents of ***Marine Educational Laboratories*** proposed as part of the development of an artificial reef system created through the partnership between government agencies, local school districts, and the private sector marine and ocean enthusiasts.

We note that California fisheries depend on a healthy marine ecosystem, and all components need to be maintained to preserve extractive and non-extractive uses. We note also that the Ocean Protection Council Strategic Plan calls for actions that will facilitate a transition to sustainable fishing practices, improve fisheries management in cooperation with the Department of Fish and Game, and preservation of working harbors through investments in infrastructure.

We fully support the proposed Resolution and ask that you consider revising the Resolution as follows:

> "FURTHER RESOLVES to dedicate up to $3 million of existing funds for projects that support sustainable fishing practices. Potential projects that could be funded include expansion of direct-to-consumer seafood markets, local fishing harbor revitalization, cooperative research, funding mechanisms such as the California Fisheries Fund, quota systems and limited entry programs, vessel and permit buybacks, ***the development of sustainable artificial reef systems along the California coast***, and other projects."

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Redwood City, CA 94061

Phone: 650-400-9887
Fax: 650-851-1562

www.oceansfoundation.org

It is our belief that the natural reef system which creates the abundant fisheries along the California coast can be enhanced through an artificial reefing system that would generate further healthy marine ecosystems, thereby enhancing fisheries. For over 25 years, studies have continued to show that environmentally sensitive artificial reefs provide advantageous environments for fish productivity and for restoring biodiversity.

Our recommendation is in full compliance with many of the Goals, Objectives and Actions contained in the COPC's *"A Vision for Our Ocean and Coast – Five Year Strategic Plan – 2006"*

We ask and encourage you to support the revision of the Resolution to include the concept of sustainable artificial reefs. In so doing, you set the stage for the development of standards, requirements and programs to effectively implement these forms of fisheries enabling California to be a leader in the future of restoring the abundance of the marine ecosystems

We appreciate the opportunity to be a part of this important process and want to continue to be involved in the State's activities with regards to the preservation, restoration, and enhancement of the California coastal areas. Please add our name to the list of others to receive future announcements, notices, and reports issued by the California Ocean Protection Council, the Secretary for Resources, the California Department of Fish and Game, and the California Coastal Conservancy, particularly as these may affect the Northern California coastal areas.

Notice should be sent to:

Dean A. Rewerts
Director/Vice President, Governmental Relations
Northern California Oceans Foundation
1391 Woodside Road, Suite 218
Redwood City, CA 94061
dar288@aol.com

Thank you for your assistance and consideration. If you would like us to participate in the hearings in this matter and to offer additional support for our recommendation, please feel free to contact us.

Sincerely,

NORTHERN CALIFORNIA OCEANS FOUNDATION

Harry Wong
President

HW/er

RECEIVED
OCT 02 2006
COASTAL CONSERVANCY
OAKLAND, CALIF.

cc: Governor Arnold Schwarzenegger
State of California
State Capitol Building
Sacramento, California 95814

Mr. Brian Baird
Assistant Secretary for Ocean and Coastal Policy
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Mr. Drew Bohan
Executive Policy Officer
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Ms. Leah Akins
Ocean and Coastal Policy Analyst
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Mr. Sam Schuchat
Executive Officer; Council Secretary
California Coastal Conservancy
11th Floor
1330 Broadway
Oakland, California 94612

From: Barbara Stickel
Sent: October 5, 2006

Your proposal sounds interesting, but I'm not too sure about the potential uses of funds. I don't know what the "California Fisheries Fund" is, but as for the other suggestions, I think just about every species is already sewn up in a limited entry program of some sort, and anything to do with quota systems would just eat up the limited funding, too.

Also, I for one don't like to see anything that refers to funding any more vessel or permit buybacks at this point in time. The Nature Conservancy buyout has severely adversely impacted the City of Morro Bay and our fishing fleet. They're continuing their foray up the coast, and are now in negotiations with fishermen from Moss Landing and Pillar Point Harbor - how much can our ports and harbors (and our fleet) take? There already are only about 2500 licensed commercial fishing boats in the state. I know those were all just suggested types of projects, but often the suggestions shape reality.

$3 million isn't really that much money, and I believe what we really need is data to verify sustainable fishing methods. We need (it might exist) an assessment of where data is lacking, but even more than that, I think we need the data that's been collected to be compiled and put to use. A couple of years ago, my husband's hook-and-line fishing operation was observed by federal fishery observers for two seasons. The second year that he was observed, he asked when they would have sufficient data on his operations, and was essentially told that there was no plan in place for actually certifying a fishery, just mandatory observer programs - which to us sounded like good job security for some people, but a huge waste of time and money. The observer's comment when he got off the boat, "it was good to finally see that [clean fishing] is possible."

There are dozens of hook-and-line, small-scale fishermen up and down the coast who are being denied access to groundfish resources because of past abuses by other gear types. Buyouts, quota systems and some of the other proposals merely reward those who abused the resources and already profited from those abuses. Collaborative research and data processing are what will get those of us who always did fish sustainably back to fishing again.

Thank you for your consideration.

Barbara Stickel
b.stickel@charter.net
F/V Regina
Morro Bay, California

October 6, 2006

California Ocean Protection Council
Mike Chrisman, *Secretary for Resources, Council Chair*
Steve Westly, *State Controller, State Lands Commission Chair*
Linda Adams, *Secretary for Environmental Protection*
Sheila Kuehl, *State Senator, Ex officio Member*
Pedro Nava, *State Assemblymember, Ex officio Member*

At a meeting held September 27, 2006, the Ventura Port District Board of Port Commissioners directed me to express the District's support regarding the proposed "Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustainable Fisheries Management."

The Local Coastal Program for the Ventura Harbor places commercial fishing as the highest priority as far as its land use designation. As a result, in the early 1980's a substantial amount of infrastructure improvements such as a commercial offloading fishing pier, hoists, ice plant, fishermen's gear storage facility, and fuel dock were developed to support commercial fishing. The District is hopeful that in the future, funds will become available to upgrade our aging facilities and infrastructure to insure the long term economic viability of the commercial fishing industry in the area. We recommend the Council approve the proposed Resolution that would support not only sustainable fishing practices, but help revitalize local fishing harbors like ours.

Should you have any questions, please don't hesitate to contact me at (805) 642-8538 or via email at opena@venturaharbor.com.

Sincerely,

Oscar F. Peña
General Manager on behalf of the Board of Port Commissioners
Edward McCombs, *Chairman*
Monty Clark, *Vice Chairman*
Robert Bravo, *Secretary*
Keith Turner
Nicholas Deitch

Ventura Port District
1603 Anchors Way Drive, Ventura, CA 93001-4229
805/642-8538 • FAX 805/658-2249
www.venturaharbor.com

SANTA MONICA BAYKEEPER

October 16, 2006

California Ocean Protection Council
VIA E-MAIL

Re: Comments on Proposed Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustainable Fisheries Management

Dear Chairman Chrisman and Council Members,

Healthy marine ecosystems must be the top priority of the California Ocean Protection Council. The focus of this proposed resolution should be shifted to attaining and maintaining healthy marine ecosystems, rather than attempting to preserve commercial fishing interests at all costs. Such focus on commercial fishing diminishes the urgent need to protect and restore our damaged marine ecosystems.

Without healthy marine ecosystems, there would be no "rich coastal heritage." The commercial fishing industry exists because this precious marine resource exists. The "tens of millions of dollars per year" generated by this industry depend on healthy fish stocks, which has faced relentless pressure by commercial fishing. Other industries, like tourism, also rely on healthy marine ecosystems and have suffered due to diminished marine ecosystems.

We must put more emphasis on ensuring "the long-term health of fish stocks and marine resources" than on creating "economic opportunities for fishermen." Revitalized fish stocks will lead to enhanced fishing opportunities, as well as improvements in other industries. The $3 million allocated to enhance fisheries projects would be more effectively spent on programs to enhance and restore our depleted resource, than on ways to continue to allow more fishing.

The results of healthy marine ecosystems benefit more than one industry. While sustainable management practices are important, special attention afforded to the commercial fishing industry is inappropriate. Please consider the wide-ranging benefits that healthy marine ecosystems provide not only to fishermen, but also to all community members.

Sincerely,

Tracy Egoscue
Executive Director

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P.O. Box 10096 · Marina del Rey · CA · 90295 | 310·305·9645 | Fax 310·305·7985 | www.smbaykeeper.org

From: Julie Thayer, Point Reyes Bird Observatory
Sent: November 21, 2006

To: California Ocean Protection Council

Please accept this statement from PRBO Conservation Science regarding the Proposed Resolution of the California Ocean Protection Council Supporting Innovative Approaches to Sustainable Fisheries Management.

We applaud COPA's quest towards sustainable fisheries management, specifically their recognition that fisheries depend on a healthy marine ecosystem, and all components need to be maintained to preserve extractive and non-extractive uses.

We also specifically support the proposal to fund cooperative research programs as a step towards better understanding the structure and relationships within marine food webs that support commercially important fisheries as well as other upper trophic predators (marine birds and mammals). PRBO has been engaged in cooperative research with local commercial and sport fishers for the past several years, which has provided valuable data while simultaneously helping fishers economically and building collaboration between scientists and the fishing community. Unfortunately, funding is often difficult to obtain despite the numerous benefits from these types of projects, and thus we feel it is important for COPA to recognize the value of cooperative research and prioritize this funding in the future.

Sincerely,

Julie Thayer
PRBO Conservation Science
Marine Ecology Division
3820 Cypress Dr, #11
Petaluma, CA 94954
707-781-2555, x317
jthayer@prbo.org

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802- 4213

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NOV 2 2 2006

Mr. Mike Chrisman
Council Chair, California Ocean Protection Council
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Dear Mr. Chrisman:

NOAA's National Marine Fisheries Service (NMFS) takes this opportunity to comment on the California Ocean Protection Council's (Council) proposed resolution supporting innovative approaches to sustainable fisheries management. As a steward of living marine resources, NMFS conserves, protects, and manages these resources in a way that ensures their continuation as functioning components of marine ecosystems, affords economic opportunities, and enhances the quality of life for the American public. Consequently, NMFS supports and encourages efforts that promote innovative approaches to sustainable fisheries. The Council's resolution to address this part of California's maritime heritage is a positive contribution towards providing future economic opportunities for fishermen and local fishing communities. In that regard, NMFS offers two comments that the Council may want to consider in finalizing its resolution.

The first comment addresses the concept of expanding direct-to-consumer seafood markets. While this strategy presents an efficient marketing tool, it may also come at some risk to other components of the fishing community. The Council may be successful in soliciting proposed projects that provide additional economic opportunity for fishermen, especially in setting price, but the council may also reduce the role of seafood processors. Processors play a key role in the preparation or packaging of fish that render it available for suitable use. As a result, processors also contribute to the economies of local fishing communities. Consequently, there may only be a limited capacity to increase the economic opportunity under this proposal. I would suggest that the Council keep this in mind as it considers adopting this important resolution.

The second comment speaks to the issue of management input and output controls such as quota systems, limited entry programs, vessel and permit buybacks, and other projects that are suggested in the resolution. While these fishery management tools are critical to controlling catch and effort in providing for sustainable fisheries, they may duplicate ongoing efforts under the current state and federal fishery management regime. Because funds are limited (i.e., $3 million) under this resolution, NMFS suggests that the Council may want to insure that solicitation and selection of projects does not overlap with existing management efforts at the expense of overlooking innovative proposals submitted under this commendable objective.

In closing, NMFS thanks you for this opportunity to comment. We look forward to working with the Council, the Resources Agency, and especially the California Department of Fish and Game in collaborative efforts to improve the protection and management of California's ocean and coastal resources.

Sincerely,

Rodney R. McInnis
Regional Administrator

cc:
Ryan Broddrick – CDFG
Don Hansen - PFMC

The Ocean Conservancy * Natural Resources Defense Council
World Wildlife Fund * The Otter Project * Surfrider Foundation
Defenders of Wildlife * Seaflow
Upwellings Ministry of Environmental Stewardship

November 24, 2006

Mike Chrisman, Chair and Members
California Ocean Protection Council
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: Support of the Joint Management Plans for the Monterey Bay, Gulf of the Farallones and Cordell Bank National Marine Sanctuaries

Dear Chairman Chrisman and Members of the Council:

The undersigned organizations are writing to convey to the Ocean Protection Council our strong support for adoption of the improved conservation measures provided under the revised management plans for the Gulf of the Farallones, Monterey Bay, and Cordell Bank National Marine Sanctuaries.

The Joint Management Plan Review (JMPR) for these three national marine sanctuaries is an issue of vital concern to the ocean and coastal waters of the State of California. Extending from Cambria to Bodega Bay, the central California coast possesses some of the most spectacular ocean life and undersea habitats in the world, an amazing diversity of marine mammals, seabirds, and fish, and several rare and endangered species. But increasingly, overfishing, pollution and habitat destruction threaten these unique and important ocean areas.

Monterey Bay, Gulf of the Farallones and Cordell Bank were designated as national marine sanctuaries more than 15 years ago, in part to protect the coast from oil drilling. Times have changed and the sanctuaries now face a number of new threats that need to be addressed. It is time to revisit and review how these areas are managed to ensure they are true places of refuge and protection for ocean life. The sanctuaries have engaged in an extensive public process to solicit community input and have received over 14,000 public comments during this process to date. Many of our organizations have submitted comments on the scope of the management plan and environmental review. We support revising and strengthening the management plan and DEIS, and look forward to timely adoption of the final EIS and new regulations to implement the revised management plans. Specifically, we support:

- Marine protected areas, including no-take marine reserves, within the federal waters of the sanctuaries to complement the efforts of the State of California under the Marine Life Protection Act.
- Prohibiting cruise ship dumping in all sanctuary waters.
- Protecting the sensitive Cordell Bank from any seabed disturbance that could harm benthic habitat, plants and animals.

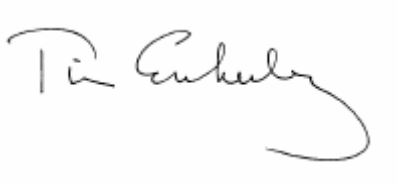
- Prohibiting the attraction or harassment of white sharks in sanctuary waters.
- Including the Davidson Seamount within the boundaries of the Monterey Bay National Marine Sanctuary, and protecting its bottom habitat.
- Updating the definition of motorized personal watercraft in the Monterey Bay National Marine Sanctuary.
- Prohibiting the introduction and spreading of harmful aquatic invasive species.
- Reducing pollution of beaches, creeks, rivers, estuaries and the ocean within the sanctuaries.
- Prohibiting finfish farming operations within sanctuary waters.

Strengthening the management plans for the Monterey Bay, Gulf of the Farallones and Cordell Bank National Marine Sanctuaries will provide benefits for the State of California and the ocean ecosystem. We urge the members of the Ocean Protection Council to join us in supporting the JMPR.

If you have any questions, please contact Tim Eichenberg of The Ocean Conservancy at 415-979-0900.

Thank you for considering these comments.

Sincerely,



Tim Eichenberg
The Ocean Conservancy

Kate Wing
Natural Resources Defense Council

Chad Nelson
Surfrider Foundation

Michael Osmond
World Wildlife fund

Michael Stocker
Seaflow

Jim Curland
Defenders of Wildlife

Steve Shimek
The Otter Project

Rev. Deborah Streeter
Upwellings Ministry of Environmental Stewardship

November 27, 2006

Mike Chrisman,
Chair, California Ocean Protection Council
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Comments regarding the Statewide Marine Protected Area (MPA) Monitoring Institution and Research and Monitoring Priorities for the Ocean Protection Council

Dear Secretary Chrisman,

As academic scientists involved in coastal ocean and marine protected area research, we would like to take this opportunity to commend the Ocean Protection Council for the proposal to create a statewide MPA Monitoring Institution (Institution). We welcome this initiative to develop an essential program that will build the capacity to organize and analyze data as well as effectively communicate results to the public and resource managers. This will not only enhance understanding of the impact of MPA's in California, but also MPA's worldwide.

We would also like to encourage the Council to (1) have a broader vision for the Institution, and (2) include this broader vision in the Council's research and monitoring priorities laid out by Executive Policy Officer Drew Bohan.

Currently, the Council's strategy provides for the development of an Institution that would focus on the impacts and effects of MPA's. We believe that this Institution can have a broader focus. The Institution should be designed with the foresight to not only focus on the critical MPA monitoring and evaluation activities but also to broaden its focus to Ecosystem-Based Management and to integrate synthesis work with the breadth of marine and coastal monitoring in California. In this way, the Council's resources will be collected in one institution that has the ability to address a variety of inter-linked marine and coastal management needs.

<u>A Broader Institution:</u>

The Institution can be built specifically to absorb scientific results from coastal ocean projects supported by the Council, synthesize them with other state and national efforts, and produce products for diverse scientific, public and policy audiences. It would receive data and reports from future MPA monitoring efforts and efforts already underway (e.g. CRANE), as well as coastal ocean observing systems and many other sources, including remote operated vehicle surveys, satellite or sea floor imagery, ecological and biological coastal surveys, Sea Grant products, and Agency research efforts.

This type of coordination would accomplish several purposes. It would ensure minimal overlap in monitoring efforts, minimize redundant costs, and assist the state in identifying critical gaps in research needed to answer policymaking and management questions. Most critically, the Institution would package raw data into understandable and applicable conclusions, a critical step in ensuring effective outreach of important information.

We acknowledge that we are suggesting a major effort that has never before been taken on by a state. This effort can be phased in over time according to a schedule to be determined once the idea is accepted. This endeavor would secure California's position on the cutting edge of ocean protection.

We would be happy to continue a dialogue with you about this idea.

Sincerely,

Steven D. Gaines, Ph.D.
University of California, Santa Barbara

John Largier, Ph.D.
Bodega Marine Lab
University of California, Davis

Signature not Available

Judith Kildow, Ph.D.
California State University, Monterey
Bay

CC: Secretary for Environmental Protection Linda Adams
State Lands Commission Chair State Controller Steve Westley
Senator Sheila Kuehl
Assemblymember Pedro Nava
OPC Science Advisor Amber Mace
OPC Executive Policy Officer Drew Bohan
OPC Staff

RECREATIONAL FISHING ALLIANCE
National Headquarters
P.O. Box 3080
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Fax: (609) 294-3816

Northern California State Chapter
Phone: (707) 964-8326

Southern California State Chapter
Phone: (818) 559-0230

Monday, November 27, 2006

Drew Bohan
Ocean Protection Council Executive Policy Officer
1416 9th Street, 13th Floor
Sacramento CA 95814
Sent via e-mail to drew.bohan@resources.ca.gov

RE: Support for grant funding for AGP video

Dear Drew:

As a key representative of the Recreational Fishing Alliance and a member of the MLPA Initiative Statewide Interests Group, I strongly urge that the Council fully funds the needs of AGP video to continue their webcasts, video archives and DVD production.

It is virtually impossible for those of us who are volunteers to keep well informed of proceedings at all the meetings while they travel around the state without the services of AGP. I cannot imagine having to go back to the way things were two years ago.

Sincerely,

Joel Greenberg
Chairman, Southern California Chapter
Recreational Fishing Alliance

Tel: (818) 559-0230
Email: rfacer@ix.netcom.com

The Recreational Fishing Alliance (RFA) is a national 501(c)(4) non-profit grassroots political action organization whose mission is to safeguard the rights of salt water anglers, protect marine, boat and tackle industry jobs, and ensure the long-term sustainability of our nation's marine fisheries. The RFA has two chapters in California, as well as chapters in most other coastal states, representing approximately 80,000 members nationwide.

1444 9th Street
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www.healthebay.org

Heal the Bay®

November 27, 2006

The Honorable Mike Chrisman
Chair, Ocean Protection Council
13300 Broadway, Suite 1300
Oakland, CA 094612

Re: Central Coast Marine Protected Area Monitoring, California Coastal and Marine Mapping Initiative, and OPC/DFG Joint Work Plan for Expenditures and Implementation of the MLMA and MLPA.

Dear Mr. Chrisman:

Heal the Bay, a nonprofit environmental organization with over 10,000 members dedicated to making Southern California coastal waters and watershed safe, healthy, and clean, supports the allocation of funds to assist Marine Life Protection Act ("MLPA") implementation in northern California as outlined in the three agenda items referenced above. However, we are concerned that the Ocean Protection Council is not considering funding MLPA related projects in a statewide context. Therefore, we urge you to consider a long-term and statewide funding strategy for MLPA related activities.

The MLPA calls for the implementation of a statewide network of Marine Protected Areas ("MPAs") by 2011. Through the central coast MLPA implementation process, it has become evident that designing, establishing, and monitoring MPAs is a costly endeavor. The Ocean Protection Council's commitment to support the MLPA process is reflected in its Strategic Plan, in which a stated objective is to "help complete and implement a statewide network of Marine Protected Areas." To achieve this objective, the OPC vows to help secure funds for the design, implementation, and monitoring of MPAs throughout California.[1] Yet, the Strategic Plan provides no specific statewide funding strategy for these actions.

Southern California's marine ecosystems are stressed and continue to face many threats such as polluted runoff, marine debris, habitat destruction, and overfishing. Kelp beds throughout the Santa Monica Bay have declined substantially since the early 1900s.[2] The majority of fishing throughout the State occurs in Southern California. Together, Los Angeles, Orange, and San Diego counties account for over half the recreational fishing activity in California. A recent report from the California Recreational Fish Survey indicates that in 2005, 631,380 recreational angler trips were taken in Northern California;[3] while over double that effort (1,310,393 recreational angler trips) occurred in Southern California.[45] As a valuable tool for both ecosystem protection and fisheries

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[2] Ambrose, R. (2005) Southern California Environmental Report Card, UCLA Institute for the Environment, p.22. http://www.ioe.ucla.edu/RC05.pdf
[3] Alameda, Contra Costa, Solano, Marin, San Francisco, San Mateo, Mendocino, Sonoma, Del Norte, and Humboldt counties combined.
[4] Los Angeles, Orange, and San Diego counties combined.

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management, MPAs are likely to help replenish these depleted populations. It is critical that the Ocean Protection Council develop a statewide funding strategy for MLPA related activities to ensure that in addition to the central coast and Northern California, Southern California receives support for MPA development.

Furthermore, in establishing a statewide network of MPAs, it is essential that habitat mapping and monitoring programs are conducted in each sub-region of the state, and are compatible across sub-regions. Therefore, it is integral that the Ocean Protection Council adopt a strategic funding approach for statewide MLPA implementation over the next five years. Without such strategic planning, funds may be expired before complete statewide MLPA implementation is achieved.

Thank you for the opportunity to comment; please contact us if you have any questions at 310.451.1500.

Sincerely,

Sarah Abramson, MESM
Staff Scientist

Mark Gold, D.Env.
Executive Director

[5] California Recreational Fisheries Survey 2005 Annual Review, Report to the California Fish and Game Commission. Prepared by Department of Fish and Game-Marine Region, p.5 (March 2006) http://www.dfg.ca.gov/mrd/crfs_pfmc0306.pdf