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Skyli,

These are my personal notes, not comments of an organization.

First of all, thank you for your commitment to standardized data, transparency, and open data sharing.

Then, reading that Ken Wiseman is Chair of the OST Monitoring Enterprise Subcommittee completely undermines my confidence that you will be successful. The MLPAI is not famous for transparency.

Contrary to what Mr. Wiseman will tell you, the MLPAI stakeholder process was not a collaborative process about protecting marine ecosystems--it was a forced compromise on the placement of closed fishing and gathering areas. Large environmental organizations set up shop and hired locals to attend stakeholder meetings, while ocean fishermen and gatherers had to miss work to participate. Some individuals came out with extreme proposals that moved the middle ground over. The MLPAI changed the rules randomly during the N. Central Coast process, first asking the group to eliminate some proposals, then not allowing them to eliminate an extreme proposal. Then, during adoption, additional closures were added to please some factions. The disproportionately severe impacts to some fishing communities, such as Point Arena, are an environmental justice issue. That issue is being overshadowed by the tribal rights conflict.

Mr. Wiseman told us, in a private meeting that he called to recruit North Coast liaisons, that he would bring Bodega Bay fishermen up to tell us what a great trade-off it was to close both sides of Pt. Arena instead of near Bodega Bay. I was a Bodega Bay fisherman. So was my brother who lives there, several other family members, my husband, and folks from all over who fished there seasonally for decades. We also fished Point Arena. As a Marine Lab person, I'm sure you know that there is actually a permanent rockfish closure all along Bodega Head, including Bird Rock -- creating a safety issue for the little boats that came there every summer and fished the traditional, nearby places.

Many people have no idea what traveling three miles at sea in a little boat is like, but for recreational fishermen it is far more dangerous than fishing behind the Rock and close to the entrance above the whistle buoy, and is prohibitive in choppy weather. --Another blow to small port income. Already there is no haul-out facility in Bodega Bay, and, last I heard, Spud Point Marina was facing financial woes. Hey, you can always careen your boat on the mud for repairs like Drake did 340 years ago. --Safer than trying to get your disabled boat to San Francisco or Tomales Bay, where anchoring is an issue.

Effectiveness: The dissenting views on the SAT raised questions about the basic assumptions of whether the MPAs can accomplish anything, and what those goals might be. The size and spacing guidelines apparently were not scientifically supported. Those questions were out-voted, not addressed. The assumption that the MPA's are going to work at all depends on having adequate enforcement, which is not going to happen--the state cannot afford

it.

Will private organizations that paid for the MLPAI pay for enforcement? What would privately funded enforcement look like? Would the enforcement program claim to be exempt from government sunshine laws, as the MLPAI tried to do?

I heard you to say that you hope citizen enforcement will largely protect MPA's from poaching, at least in populated areas. When you design your MPA monitoring program, please keep in mind the second principle of the scientific method: Hope is not a method! Monitoring is futile without enforcement. On the North Coast, MPA's in remote areas are easily accessible by poachers; so are MPA's in populated areas of the coast. A couple years ago, for example, my husband and I swam out to our favorite abalone area on the Mendocino Coast, at daybreak on opening day of the season. Hundreds of abs had been recently picked by someone poaching from a boat. Consider that abalone is a focus of CDFG law enforcement. This happened in a very public place, and happens often. Along with enforcement focus, there is already citizen watch; what would make that factor suddenly increase? You are probably aware that the Game Wardens Association opposed the MPA's as unenforceable, and called them "Marine Poaching Areas," in a letter to the F&G Commission.

I have a lot of questions about monitoring MPA's.

How will you know if the MPA's are working?

What are the goals and objectives, and what are the criteria for success?

What will you measure? Since the SAT did not set specific ecological goals, who will set them?

How will you control for effort shift (increased fishing outside MPA's)?

There is no baseline data from before the MPA's, so how can you compare before and after?

How will you factor in other changes in fisheries management?

How will you find areas of similar habitat for control, when major areas of certain habitat are closed?

How will you control for ocean condition fluctuation?

How will poaching events be accounted for in monitoring?

Will the monitoring team recommend management approaches to control invasive species, to obtain optimum fertility of certain species, or to avoid trophic cascades in MPA's?

How will you measure impacts on communities?

What are the OPC's criteria and objectives for sustainable fishing communities?

In Humboldt County, a large percent of legal employment is government jobs. Some fishermen are earning money collecting ocean data. Will the ocean sector become predominantly government-funded research, instead of fishing-based? Is that sustainable? What happens to displaced fishermen (and their families) who do not become researchers?

Both MPA's and ITQ's have short-term detrimental effects on remaining fragile fishing community infrastructure, while their long-term benefits are speculative at best. How do you envision them specifically benefitting sustainable fishing communities?

The ocean is a huge, dynamic body of water, moving like a giant river, with wind, waves, and current. I fished salmon when the season was seven months long; we lived on our boat all summer, and followed the fish up the coast. Price was low for rockfish and coho, so we put them by for our winter subsistence. Who wants to even try to fish between all those closed areas? I think pig farms are the answer. Or we could eat algae<yum!
This is too depressing--I'm going to go ride my horse.

I look forward to hearing your thoughts on these questions.

Vivian