

Christine Ambrose
Environmental Protection Information Center
P.O. Box 818
Arcata, California 95518

July 27, 2001

Paul Reilly
Department of Fish and Game
20 Lower Ragsdale Drive, Suite 100
Monterey, CA 93940

RE: Marine Life Protection Act Initial Draft Concepts

Dear Sir:

I am writing in support of the Northern California proposed marine protected area sites proposed in the current draft maps #1 and #2 dated July 16, 2001. I support these designations so that under the Marine Life Protection Act the areas designated become reserves, parks or conservation areas, receiving a higher level of protection than they are currently provided. I am also writing in support of the benefited species listed that were considered in the designation of habitats.

However, if we are to adequately provide the size and spacing required for a range of marine species, the reserve network needs to be expanded to provide enough space for movement of both juveniles and adults. A core-buffer-multiple use zone strategy is commonly applied to protected areas networks (R.B. Primack 1993: Designing Protected Areas. In, *Essentials of conservation biology*.) A core-buffer-multiple use zone strategy needs to be more fully applied to the overall design. Many of the areas are so small that the beneficial ratios of edge to interior area appear to be unacceptably low. In many cases bathymetric lines or the three mile limit might serve better as the protected area boundaries. The nearshore area provides the only refugia left.

Anadromous salmonids should be included in the list of species that would benefit from a marine protected areas network, and their habitat needs considered. While anadromous fish are not resident, they provide a critical part of the overall naturalness, abundance, and diversity of marine life in our oceans, and contribute to the structure, function, and integrity of marine ecosystems that are in turn sustained by their presence. Please consider adding anadromous fish species to sufficiently encompass the full spectrum of marine life. If you do not add them, please explain why your agency believes that anadromous fish do not contribute to the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems.

While I am in support of the protected areas designations as currently outlined, it is my professional opinion that these reserves are far too conservative in their scope and design. I request that the Master Planning Team develop a range of alternatives that considers a larger protected area network benefiting the full array of marine species present in the state coastal waters of California. Is the California Department of Fish and Game planning on preparing an Environmental Impact Report subject to the California Environmental Quality Act, and if not, what statutory or categorical exemption are you citing? Due to the scope of the project and the level of controversy, I request that Fish and Game prepare an Environmental Impact Report (EIR). An EIR would ensure that a range of alternatives are adequately considered, including a larger protected area network with more restrictive designations, encompassing the full range of fish species present in our oceans waters that would benefit from a reserve network.

My concerns are outlined further below by geographic area:

Consideration of Pyramid Point as State Marine Park: Pyramid Point is located at the estuary of the Smith River, the last great undammed river in the state of California. The Smith River currently contains some of the best remaining fish habitat left in the lower 48 states. Many marine species benefit from the freshwater inputs and nutrient inputs coming from the Smith River. This area deserves further consideration for additional protection.

Saint George Reef State Marine Reserve: This area was considered for reserve designation because it contains "the only offshore banks north of Point Reyes that occur in state waters". Because of the significance of this area, a buffer area of one nautical mile designated as state marine park should be designated around the entire reserve.

Castle Rock State Marine Conservation Area: I support the designation as mapped, except for the southern boundary. I support moving the boundary approximately ten kilometers south of Midway Point to protect the area from near shore fishing by longline. I support using bathymetric lines as the boundary.

Consideration of Klamath River mouth as State Marine Park: The Klamath River area represents a major river mouth with rich bottom sediments and rocky coastline associated with freshwater runoff, providing a habitat that is relatively scarce in California. I support the designation of the Klamath River mouth as a state marine park.

Reading Rock State Marine Park: I believe the current proposed park area is too small. The area is directly adjacent to Redwood National Park, and should be greatly expanded so as to include the entire Park coastline down to Patricks Point State Marine Reserve Area. Designating this area as park would be consistent with the rest of management direction for the adjacent land area where wardens are already present, and would provide additional refugia for fish from harvesting pressures.

Patricks Point State Marine Reserve and Trinidad State Marine Conservation Area:

I support the designation of Patricks Point as a State Marine Reserve. This area is rich in marine life, including whales, seals, kelp beds, and intertidal pools. I request that you consider designating the Trinidad Marine Conservation Area as a Park. These areas contain similar outstanding examples of important and rare habitat types that benefit a range of marine species.

Humboldt and Arcata Bay State Marine Conservation Area: I support designating South Humboldt Bay as a State Marine Reserve, Arcata Bay as a State Park, and the Middle Humboldt Bay as a state conservation area. Humboldt Bay contains unique habitat - large Eelgrass beds - which are critical nursery grounds for many species of fish. Humboldt Bay also contains important shellfish habitat. Commercial fishing is already largely prohibited in Humboldt Bay. Designation as a Marine Park would also provide additional protection to Humboldt Bay from the introduction of aquatic nuisance species from ballast water. Humboldt Bay is in an extremely vulnerable location to aquatic nuisance species invasions carried by ships from international waters, and domestic ships coming from San Francisco Bay.

Eel State Marine Reserve: I support the reserve designation for this area; however, this area should be expanded. The justification for this area is " a major river mouth and rich, bottom sediments associated with freshwater runoff, providing a habitat that is relatively scarce in California." This suggests that the area deserves a larger protection zone that follows the bathymetric contour or the three mile limit of state waters north and south of its current boundary.

Cape Mendocino Proposed Park: Was it an accident that Cape Mendocino was not designated because it falls on the splice between the two map pages? According to NMFS's Status review of coho salmon (1995), Cape Mendocino represents the transition point between distinct communities of marine fishes and marine invertebrates, making it an area of significant genetic and biological importance for our understanding of marine ecosystems. This area is also the westernmost point of California, on a remote section of coastline with significant marine life, outstanding natural values, and important rocky coastline habitat, and certainly warrants some protection.

The King Range State Marine Reserve: I support the designation of the King Range State Marine Conservation Area, however, please modify the reserve boundaries to reflect bathymetric contours or the three mile limit if it is practical to do so. Also, given that the coastline of the Lost Coast is one of our national treasures, the entire section of coastline between the Kings Range Marine Reserve down to the end of the Lost Coast State Marine Reserve as modified below should be designated as State Marine Park. This designation would help protect the nearshore fish from longline fishing pressures.

Shelter Cove Conservation Area: The Shelter Cove Conservation Area should be expanded south to include the entire coastal area to the west of the Sinkyone State Marine Park, out to the three mile state limit. The land portion of this area is already managed for passive recreational uses and that conservation area designation would be consistent with that use.

Sinkyone Marine Park: The Sinkyone Marine Park should be expanded to include the area between Mistake Point and Abalone Point. This is an extremely remote section of coastline

DeHaven State Marine Park: The DeHaven State Marine Park should be expanded to the north as described above to adequately protect near shore marine values from longline fishing.

Summary Conclusions

Controls on pollution, ballast water, runoff, over fishing and oil spill threats are critical for protecting the coastline of California - a globally significant area of outstanding natural value - for future generations. On land, people have long accepted the principle of preserving wilderness areas and parks where hunting and other resource extraction activities are prohibited. These protected areas have in turn served as important reservoirs of biodiversity that have helped to maintain wild populations of many plants and animals. It is time for the concept of wilderness to be applied to our marine areas.

Marine reserves will protect biodiversity and maintain healthier ecosystems by encompassing the whole near shore marine ecosystem. These areas will in turn provide for healthier fish populations in the future. Marine reserves, where no fishing is permitted, serve as "biological insurance policies" for future generations against our imperfect ability to project sustainable catch levels. Protection from fishing in marine reserves leads to increases in abundance, density, size, or biomass of commercially valuable fish and shellfish species within the reserves.

I commend the Master Planning Team for all the work they have done bringing this draft document to the public. We look forward to the possibility of Fish and Game developing a range of alternatives that considers a larger protected areas network along the coast of California.

Thank you for your time and consideration.

Sincerely,

Christine Ambrose, Coastal Planner