

**MONTEREY BAY NATIONAL MARINE SANCTUARY
CONSERVATION WORKING GROUP**

October 18, 2002

Chair Stephanie Harlan,
Members of the Advisory Council and
Superintendent William Douros
Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, CA 93940

RE: CWG Comments on Joint Management Plan Review Process

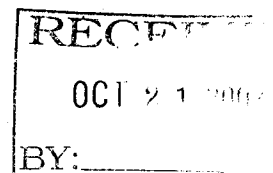
Dear Stephanie, Advisory Council members and Bill:

At our October 5, 2002 meeting, the Conservation Working Group agreed unanimously to forward the following recommendations to the Sanctuary Advisory Council and Sanctuary staff regarding the Joint Management Plan Review Process. The CWG is mindful of the large number of issues under consideration for inclusion in the revised management plan and recognize that the Sanctuary's staff and budget are limited. However, given the fact that management plan revisions occur infrequently, we believe it is crucial to plan proactively to address significant emerging conservation issues in this management plan review process and not wait until a crisis occurs. We offer the following recommendations in an effort to insure that critical resource protection issues are addressed in the most efficient and timely manner. Our comments address the following three issues: invasive species cruise ships and krill harvesting.

Invasive Species

Threats posed by marine invasive species are severe, with the potential for widespread ecological change including loss of habitat, displacement of native species, property damage and adverse impacts to commercial and recreational fisheries. We know that invasive species are already present in Sanctuary waters from Elkhorn Slough to Monterey Harbor. Given the urgency and potential severity of this threat, we urge the Sanctuary not to completely defer this issue during the Joint Management Plan Review process.

Recognizing the time constraints facing Sanctuary staff, the CWG offers to take the lead in developing a conceptual framework for addressing the invasive species issue. We envision this framework to include: (1) prevention & education, (2) early detection, and (3) worst-case scenario response. We believe the invasive species issue can best be addressed by emphasizing partnerships with existing agencies including the Elkhorn Slough Estuarine Research Reserve, the Department of Fish and Game, the Central Coast Regional Water Quality Control Board, and area harbors as well as local aquariums, marine labs and aquaculture operations. Finally, we strongly support adoption of a prohibition on introductions of invasive species.



Cruise Ships

At the June SAC meeting in Big Sur, the Advisory Council voted to direct Sanctuary staff to continue working with all cruise lines planning visits to the MBNMS to secure commitments from the cruise lines to adhere to a policy of no-discharges within Sanctuary waters. Since the June SAC meeting, the cities of Monterey, Pacific Grove and Santa Cruz, as well as the Santa Cruz County Board of Supervisors and the Central Coast Regional Water Quality Control Board have all gone on record supporting a prohibition on cruise ship discharges within Sanctuary waters.

Given the significant increase in cruise ship traffic predicted for Central Coast waters in the coming years and the strong community support for a ban on cruise ship discharges, the CWG recommends that a new regulation prohibiting cruise ship discharges in Sanctuary waters be included for consideration in the draft management plan. We believe adopting a regulation makes more sense than attempting to handle this issue on a visit-by-visit basis. At the very least, the Joint Management Plan Review process should identify the Sanctuary's protocol for addressing cruise ships visits, either under the Water Quality or Administration sections of the draft management plan. Again, the CWG is willing to take the lead on drafting either a regulation prohibiting cruise ship discharges or protocols for requesting adherence to a no-discharge policy for inclusion in the draft management plan.

Prohibition on Krill Harvesting

The CWG strongly supports a prohibition on krill harvesting in Sanctuary waters. Krill play a central role in Sanctuary ecosystems as the primary prey of most of fish, birds and marine mammals that inhabit the Sanctuary. Krill is already commercially fished in fisheries off Japan, Canada, and the Southern Oceans of Antarctica. While there are currently no commercial krill fisheries in the U.S. EEZ and krill harvest is banned in California waters through the next decade, interest in expanding krill fishing is growing, particularly as feed for large-scale commercial aquaculture. Expansion of the commercial krill fishery has the potential to seriously disrupt the food webs upon which Sanctuary species and entire ecosystems depend. It is therefore imperative to protect this critical marine resource from all commercial harvest. The CWG supports a permanent ban on commercial krill harvesting in Sanctuary waters.

Thank you for your time and consideration of our comments and recommendations.

Vicki Nichols
Chair

Kaitilin Gaffney
Co-chair