



July 22, 2008

MLPA Scoping Comments
Mr. Stephen P. Wertz
Senior Marine Biologist Supervisor
Department of Fish & Game
20 Lower Ragsdale Drive
Monterey, California 93940

Subject: MLPA North Central Coast CEQA Scoping Comments

Dear Mr. Wertz:

The California Fisheries Coalition is pleased to submit this information regarding an issue that needs to be analyzed and disclosed in the Environmental Impact Report being prepared pursuant to the California Environmental Quality Act to aggregate the full impacts that may result from the establishment of marine protected areas in the north central coast MLPA region.

We feel an avoidable negative environmental impact will occur in the Salt Point and Stewarts Point areas if the Integrated Preferred Alternative is adopted. The IPA recommends a State Marine Park (SMP) at Salt Point allowing only recreational fishing and no commercial fishing to take place. At Stewarts Point the IPA recommends a Marine Reserve (SMR). No harvesting of sea urchins would be allowed within either Marine Protected Area as presently proposed.

Significant documentation exists to conclude that sea urchin harvesting in areas otherwise rich in species diversity and supported by a large healthy stand of kelp can help conserve or restore diversity. The natural species diversity and abundance in the Salt Point and Stewarts Point areas will decrease if the preferred alternative plan is implemented.

One expressed objective of the Salt Point SMP is to ensure vibrant recreational fishing off shore of the State Park. Precluding sea urchin harvesting will have the opposite effect. Likewise the Stewarts Point SMR is to increase general species diversity. Abundant kelp is a prerequisite for abundant abalone as well as many fin fish species, however, sea urchin are known to increase their populations to an extent that they easily dominate an area creating an "urchin barrens," an area significantly overgrazed by sea urchin to the point that other kelp dependant species are negatively impacted.

A comparison of areas closed to the harvest of sea urchins and areas where sea urchins are harvested in several northern California locations has already been studied. Natural diversity and abundance in many other kelp dependent species has been shown to increase with the harvest of sea urchins. "Red sea urchin removal apparently led to increased red abalone abundance even at a site that was heavily fished by recreational abalone fishers. Meanwhile at a nearby reserve site

where kelp populations are lower, red abalones have declined in abundance as red sea urchins increased." (Karpov, et al 2001)

Presently the northern California recreational abalone fishery is managed partly by gear restrictions - only free diving is allowed, therefore, abalones have a refuge in waters deeper than 30 feet. If the harvest of red sea urchins is prohibited at Salt Point, sea urchins will eventually proliferate in deeper water and out-compete abalones in this habitat. Abalone populations and recreational abalone diving will lose the larval replacement benefits of the deeper water refugia.

Abalone surveys taken in 1971 and 1986, prior to the establishment of the sea urchin fishery in the north area show a much lower abundance of abalone than the surveys of 2006 and 2007. (See survey results below.)

Early in the 1990's the Salt Point and Stewart Point areas supported a viable sea urchin fishery out of Bodega Bay which kept the sea urchin population in check. But due largely to market conditions sea urchin harvesting has languished in recent years. In time, the sea urchins will again dominate the bottom, the kelp will disappear, and abalone will be restricted to intertidal and shallow subtidal habitats.

A participant in a major widespread Fish and Game survey of abalone habitat, predators and competitors in the north area in the early 1970's explains what he saw: "As a participant in the North Coast Abalone Survey, I remember that most of the abalone population was determined to be "intertidal." Subtidal reefs were all urchin barrens with spine to spine urchin populations dominating. Abalone populations were sparse, occupying only the very edges of subtidal habitat and in some cases abalone were observed forced off into the sand. In the 1980's, urchin harvesting removed all but "sub-legal" urchins from those reefs and abalone once again started to re-establish themselves." (Ken Boettcher, personal communication)

In southern California the Department undertook efforts to reduce the sea urchin population in the 1970's and 80's in order to protect and increase kelp beds for the specific purpose of increasing species diversity and abundance. Today many of these kelp beds are consistently at some of the most expansive levels recorded, with commercial sea urchin diving controlling the population of sea urchins and protecting healthy kelp beds.

Surveys of the north coast completed by Fish and Game and others show approximately a 100% increase in abalone populations after sea urchin harvesting began in the 1980's. Four out of five transect studies taken prior to the start of the sea urchin fishery reveal densities of abalones significantly lower than those following an active sea urchin fishery.

ABALONE SURVEYS

(Parker, et al 1986, Deacon 1973, Personal communication, Jerry Kashiwada (DFG))

Survey Area/Year	No. Transects			Density		
	1971	1986	2006	1971	1986	2006
Todd's Point			34			0.43
Caspar Cove			35			0.57
Van Damme	10	25	28	0.12	0.24	0.69
Point Arena			36			0.64
Salt Point		31	36		0.43	0.89
Ocean Cove			36			0.86
Timber Cove			37			0.81
Fort Ross	25	42	37	0.94	0.21	0.57
Totals/Average			279			0.68

REFERENCES: The report on the 1986 survey was: Parker, D.O., P.L. Haaker, and K.C. Henderson. 1988. Densities and size composition of red abalone, *Haliotis rufescens*, at five locations on the Mendocino and Sonoma county coasts, September 1986. Calif. Dept. Fish and Game, Marine Resources. Div., Admin. Rep. No. 88-5, 65pp.

Deacon J. (1973), Habitat selection and competition among abalone and sea urchins at Sea Ranch California M.Sc. thesis, UC Davis, 83pp.

The potential negative environmental impacts resulting from prohibiting sea urchin harvesting at this important location must be considered in the CEQA review of this proposed project. While CEQA calls for mitigating significant impacts the preferred option is to avoid those impacts, if at all possible. An easily available remedy for this situation would be to change the designation from a State Marine Park and a State Marine Reserve to Marine Conservation Areas and allow sea urchin harvesting as the only commercial fishing authorized. This modification would have negligible resource impacts from sea urchin harvesting (a highly selective fishery with minimum impact) but large benefits from very healthy kelp stands.

Thank you for the opportunity to submit these comments. We urge your full attention to them and trust they will contribute to a comprehensive and valuable environmental impact analysis. Please contact me if I can clarify any of our statements or be of any further assistance.

Sincerely,


Vern Goehring
Executive Director

Cc: Melissa Miller-Henson