

**Marine Life Protection Act Initiative
Public Comments Submitted
through December 29, 2010**

From: Sue Sack
Sent: Friday, December 17, 2010 2:55 PM
To: MLPAComments
Subject: Public Comment For the MLPA BRTF and F&G Commission

12/17/10

To the California Fish and Game Commission and BRTF:

I have been following the implementation of the MLPA law since 1999 and have been informed by MLPAC staff that MPAs have to be placed every 30 miles to satisfy "scientific guidelines" for larval dispersal. At an informational meeting I asked MLPAC staff member, Melinda Miller-Hensen, what kind of larvae were studied that had a maximum dispersal rate of 30 miles and I didn't receive an answer. I watched a program on UCTV a few weeks ago which was hosted by Dr. Jules Jaffe of Scripps Institution of Oceanography and he described how scientists knew nothing about larval dispersal and he described how complicated small scale and large scale ocean processes are. He and his fellow researchers have developed a miniature robot that will drift in the ocean at different depths to monitor how far larvae can travel in different ocean environments and currents. The National Science Foundation has requested a budget of \$106 million for FY 2011 to fund this project.

As research in this field is so young it is very premature to set 30 miles as a guideline for spacing MPAs. The fact that this guideline is being used with an iron fist, against local recommendations is brutal considering many people are against any more closed areas in our healthy Northerly waters. Please consider these guidelines "a scientist's wish list" for future funding opportunities as they do not seem to be supported by peer reviewed studies.

To help solve this issue I have suggested slowing down implementing closed areas by monitoring each one for five years for larval dispersal, positive and negative changes to the eco-systems inside and outside the MPA and for socio-economic impacts, before considering implementing the next adjacent MPA along the coast.

Also, there should be no rush on implementing any closed areas to fishing most groundfish species as groundfish are rebuilding or have already rebounded from the trawlers overfishing them as evidenced by the recent increases in trawler groundfish allocations. The Individual Fish Quota (IFQ) program, eligible to only trawlers, will also increase their quota of fish.

As an update: I now have more than 1,000 local signatures from Humboldt County residents and visitors against implementing more MPAs on the North Coast and I will be sending it to the newly seated Governor, Jerry Brown, to petition him to suspend the implementation of the MLPA as directed by Ex Governor Schwarzenegger.

Thanks,
Sue Sack,
Shelter Cove, CA