

Sanctuary Advisory Council

CHANNEL ISLANDS NATIONAL MARINE SANCTUARY

Member/Alternate

Tourism

Andrea Mills / Capt. Mat Curto

Business

Michael Cohen / Capt. Kip Louttit

Non-Consumptive Recreation

Debra Herring / Stuart Wilson

Commercial Fishing

Bruce Steele / Stephanie Mutz

Recreational Fishing

Capt. David Bacon / Merit McCrea

Education

Maria Petueli / Amanda Allen

Research

Dr. Robert Warner / Dr. Mark Steele

Conservation

Kristi Birney / Greg Helms

Public At-Large 1

Phyllis Grifman / Victor Cox

Public At-Large 2

Eric Kett / Richard Block

Chumash Community

Luhui Isha Ward / Mati Waiya

National Marine Fisheries Service

Elizabeth Petras / Shelby Mendez

National Park Service

Russell Galipeau / David Ashe

U.S. Coast Guard

CDR Christina Davidson / LT Cody Dunagan

Bureau of Ocean Energy Management

Donna Schroeder / Dr. Ann Bull

U.S. Department of Defense

John Ugoretz / Walter Schobel

California Department of Fish and Wildlife

Paul Hamdorf / Kristine Barsky

California Resources Agency

Rich Rozzelle / Amy Vierra

California Coastal Commission

Dr. Jonna Engel / Steve Hudson

County of Santa Barbara

Dianne Black / Susan Curtis

County of Ventura

Gary Hirtensteiner / <vacant>

Channel Islands Nat'l Marine Sanctuary

Chris Mobley [non-voting]

Monterey Bay Nat'l Marine Sanctuary

Paul Michel / Karen Grimmer [non-voting]

Gulf of the Farallones Nat'l Marine Sanctuary

Maria Brown / Brian Johnson [non-voting]

Chair: Dianne Black

Vice Chair: Phyllis Grifman

Secretary: Maria Petueli

May 21, 2013

Dr. Steve Gittings, Science Program Manager
Office of National Marine Sanctuaries
1325 East-West Highway
Silver Spring, MD 20910-3282

Chris Mobley, Superintendent
Channel Islands National Marine Sanctuary
University of California Santa Barbara
Ocean Science Education Building 514, MC 6155
Santa Barbara, CA 93106-6155

RE: ONMS National Condition Report

Dear Dr. Gittings and Mr. Mobley:

The Research Activities Panel (RAP) of the Channel Islands National Marine Sanctuary Advisory Council recently reviewed a draft version of the National Condition Report prepared by the Office of National Marine Sanctuaries. At our May 17, 2013 meeting, the advisory council unanimously approved transmitting the RAP's review comments to the sanctuary Superintendent and to Dr. Gittings at ONMS headquarters. In addition, several council members expressed concerns regarding the report and these have been provided to sanctuary staff. We would be happy to discuss our specific concerns if there is time and interest.

I appreciate your consideration of the enclosed comments and look forward to hearing back from Dr. Gittings.

Sincerely,



Dianne Black, Chair
Sanctuary Advisory Council¹

Enclosures: Voting record on the advisory council motion; RAP review comments on ONMS national condition report.

¹ *The council is an advisory body to the sanctuary superintendent. The opinions and findings of this letter do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration.*

Voting Results: May 17, 2013 – Channel Islands National Marine Sanctuary Advisory Council

Voting results on a motion approving a transmitting the advisory council’s Research Activities Panel (RAP) comments on a draft National Condition Report prepared by NOAA’s Office of National Marine Sanctuaries.

<i>Name</i>	<i>Council Seat - position</i>	<i>Vote</i>
Andrea Mills	Tourism - member	Yes
Debra Herring	Non-Consumptive Recreation - member	Yes
Michael Cohen	Business - member	Yes
Kristi Birney	Conservation - member	Yes
Bruce Steele	Commercial Fishing - member	Yes
Capt. David Bacon	Recreational Fishing - member	Yes
Maria Petueli	Education - member	Yes
Luhui Isha Ward Mati Waiya	Chumash Community	<i>ABSENT</i>
Dr. Robert Warner	Research	Yes
Phyllis Grifman	Public At Large #1 – member	Yes
Eric Kett	Public At Large #2 – member	Yes
Elizabeth Petras	NOAA Fisheries – member	Yes
David Ashe	National Park Service – alternate	Yes
LT Cody Dunagan	US Coast Guard – alternate	Yes
Donna Schroeder Dr. Ann Bull	Bureau of Ocean Energy Management	<i>ABSENT</i>
John Ugoretz	Dept. of Defense - member	Yes
Paul Hamdorf Kristine Barsky	California Department of Fish & Wildlife	<i>ABSENT</i>
Rich Rozzelle	California Natural Resources Agency - member	Yes
Dr. Jonna Engel Steve Hudson	California Coastal Commission	<i>ABSENT</i>
Dianne Black	Santa Barbara County - member	Yes
Gary Hirtensteiner	Ventura County	<i>ABSENT</i>

Yes – 16 No – 0 Abstain – 0

Date: April 16, 2013

To: Christopher Mobley, Superintendent, Channel Islands National Marine Sanctuary

Cc: Dr. Steve Gittings, Science Program Manager, Office of National Marine Sanctuaries

From: Dr. Robert R. Warner, Chair, CINMS Advisory Council Research Activities Panel

Re: Review and comment on the draft Office of National Marine Sanctuaries 2013 National Condition Report by the CINMS Research Activities Panel, Meeting of April 2, 2013²

The Research Activities Panel (RAP), a working group of the Channel Islands National Marine Sanctuary (CINMS) Advisory Council, held an annual meeting on April 2, 2013. The RAP appreciates the efforts that CINMS has made in the face of declining fiscal resources to continue to collaborate with local researchers and to support research activities through vessel time on the R/V *Shearwater* and R/V *Sharkcat*, which are important assets to the research community.

As part of the meeting agenda, we reviewed the draft ONMS 2013 National Condition Report. This document is an overview constructed from the results of 14 Site Condition Reports completed for all units of the National Marine Sanctuary System (NMSS) over the last 5 years. As stated, "it is an assessment of the pressures on and state of resources across the NMSS, and offers a summary of actions, both taken and planned in response to those findings."

In September of 2008 the RAP commented on the CINMS Condition Report, expressing a number of concerns about the relative roles of opinion and monitoring-derived data in the development of that report. Among the issues raised was our concern that the summary answers to the Condition Report questions were derived from widely differing information bases, ranging from unsupported expert opinion to thorough monitoring data. In addition, these diverse sources were synthesized into rating scores through similarly diverse and untestable evaluation processes. While the quality of the support for a particular rating was highly variable, all ratings appeared to be granted equal weight in assessing the condition of the CINMS. We expressed our opinion at that time that if all questions and subsequent ratings were of equal value in assessing condition, then those areas whose ratings were based on poor data should be the targets of increased monitoring and targeted research. Additionally, if conditions in a particular area appeared to be deteriorating according to expert opinion, this would also suggest an area that required investigation through monitoring and research. Many recent events suggest that actual management actions should be based on reliable information, or we risk disastrous and misapplied expenditures with little return.

² By a vote of 16-0 on May 17, 2013, the Channel Islands National Marine Sanctuary Advisory Council approved transmitting this memo to the named recipients listed above.

In the draft National Condition Report, concerns about data and evaluation quality - such as those identified in our previous review of the CINMS Condition Report - are not expressed. Previously identified problems are exacerbated here because comparisons are now made across the Sanctuary Condition Reports, with no knowledge of the underlying variability of information that led to site-specific ratings. Monitoring programs are described in some detail in several places in the document, but this is juxtaposed with admissions that very little monitoring or targeted research is being carried out broadly within the NMSS. There is no specific information concerning which sites are conducting targeted monitoring and which are not. The need for monitoring is stressed, but there is no way forward suggested except a vague charge to "work with other agencies".

If no indicators of the quality of information are to be made available in this document, there should at least be a disclaimer that these results should not be used as the basis for management action. Rather, these ratings (and the quality of information leading to the ratings) should be used as a guide toward the most pressing needs for accurate information.

Our greatest concern is that such reports, both in local and nationally summarized forms, will be used as a substitute for reliable, actionable information. Although stated many times in the past, it remains true: **Expert opinion cannot be used as a cheap alternative to monitoring.** Equally, if these ratings are produced solely in order to fulfill some reporting requirement, then they should carry cautions about their limitations and the dangers of their use in policy and management decisions.

Before we take action on problems, we need to know what the problems are. The NMS should take the lead in documenting the actual state of the Sanctuaries through a funded effort in monitoring and targeted research.