



December 8, 2009

State of California
Fish and Game Commission
1416 Ninth Street
Sacramento, California 95814

RE: MLPA South Coast Study Region Proposals

Dear Members of the Commission:

The purpose of this letter is to provide the Commission with our evaluation of MLPA South Coast proposals affecting State Parks. Throughout the planning process, State Parks, as a member of the MLPA Initiative Team, has provided guidance and evaluations to the South Coast Regional Stakeholder Group and the Blue Ribbon Task Force (BRTF). As both a trustee and managing agency overseeing nearly 30% of the State's coastline, State Parks has an important role in planning and implementing Marine Protected Areas (MPA). A primary mission of the State Parks is to provide for the protection of important natural resources and to provide education and interpretation opportunities for present and future generations to enjoy. State Parks has been fulfilling this mission in the south coast marine environment since 1970, through the establishment of five underwater parks.

During the BRTF's final meeting, State Parks highlighted outstanding issues remaining in each of the proposals and provided recommendations to address each issue. Our chief concerns are the loss of protections for existing State Parks underwater units and the creation of conflict between management objectives for existing state beaches and proposed MPA. Below are the highest priority concerns.

Crystal Cove State Park located within proposed Crystal Cove State Marine Conservation Area (SMCA)

Evaluation - Proposed new regulations would decrease the current protections.

Recommendation – Retain or improve existing regulations (which include the Irvine Coast SMCA and Crystal Cove SMCA) in line with the recreational purpose of the underwater park area.

Background - The existing SMCA overlays an Area of Special Biological Significance and is leased by us from the State Lands Commission for the expressed purpose of an "Underwater park for the management and preservation of resource values for public use, enjoyment, and education."

An underwater park since 1982, the SMCA provides access for managed recreation for the nearly ¾ million visitors per year, including fishing, SCUBA diving, surfing and swimming. State Parks has a variety of interpretive and educational programs at Crystal Cove featuring the ecological connection between the land and the sea. One of the most innovative programs involves live broadcasts into classrooms where students may interact with rangers in SCUBA gear exploring the underwater park.

The SMCA has had continual research since its creation, including initial inventories of both natural and cultural resources. Published research comparing marine protected areas within the study region provides evidence of relative success of direct State Park management of natural resources. A new onsite research facility provides valuable laboratory space for visiting researchers, the products of which will help guide future management.

Commercial lobster fishing exerts a significant negative impact on park management, both in terms of public safety and natural resources. More than a dozen times a year lobster traps drift too close to shore and constitute an imminent danger to park visitors, and the traps must be removed by park staff. In addition, traps regularly wash ashore and require park staff to remove them. Abandoned lobster traps litter the bottom, impacting not only the natural resources but also the quality of the recreational dive experience, again, requiring considerable efforts for removal. The SMCA has been part of extensive regional kelp restoration efforts. Trapping at Crystal Cove adversely impacts the kelp forest by physically damaging the soft reef and kelp, and by altering the balance between urchin populations and a healthy kelp forests.

Refugio State Beach located within proposed Refugio SMCA

Evaluation - Proposed removal of this existing MPA would decrease protection and open up the area to potential increased commercial extraction.

Recommendation – Retain or improve existing regulations with respect to commercial use, and in line with the recreational purpose of the underwater park area.

Background - The area includes significant natural values as well as sensitive archeological sites. The shallow relief reefs and interspersed sand substrate environments of this site contribute to high biological diversity. Culturally diverse as well, the area was once a popular trading ship anchorage, and prehistoric Chumash stone bowls have been found within this site.

Refugio State Beach receives over 100,000 visitors each year and is popular for SCUBA diving, swimming, recreational fishing and sea kayaking. Existing interpretive programs include kayak and tidepool tours.

Refugio State Beach is impacted by commercial lobster trapping. As with Crystal Cove, park staff must regularly remove lobster traps that drift too close inshore and abandoned traps that lay within the park lease.

Cardiff and San Elijo State Beaches within proposed Swami's SMCA

Evaluation - Proposed modification of existing MPA conflicts with State Beach classification and general plans.

Recommendation – Modify proposed SMCA and create additional near-shore SMCA that would allow for the addition of shore fishing. The shoreline SMCA would be rated at a moderate low level of protection based on SAT (Science Advisory Team) criteria, but would not affect rated level of protection of the far larger Swami's SMCA.

Background – The proposed MPA will affect both Cardiff and San Elijo State Beaches. Over three million people visit these beaches annually. San Elijo State Beach provides 172 campsites.

The classification of a State Park System unit forms the foundation on which all management and development policies are based. State Beaches are a class of State Recreational Areas which are operated to provide outdoor recreation opportunities. State Beaches provide swimming, boating, fishing, and other beach-oriented recreational activities. An SMCA with high Level of Protection (LOP) would conflict with one of the primary purposes of these park units.

Doheny State Beach located within proposed Doheny SMCA

Evaluation - Proposed removal of this existing MPA would decrease existing protection and decrease educational opportunity.

Recommendation – Retain the existing regulations which are in line with interpretive and educational purpose of the underwater park area.

Background - Doheny State Beach includes an existing underwater recreation area and the Doheny Beach Marine Life Refuge which was designated in 1969 by the Legislature specifically to protect tidepool invertebrates. The existing protections are moderate and do not affect commercial activities. Although relatively small, over 1.6 million people visited Doheny State Beach in 2008.

Doheny State Beach has existing interpretive programs, including a visitor's center with an indoor interactive tidepool exhibit. Exclusion out of the array would orphan any MPA tie-in and dilute MLPA educational goals and objectives.

In closing, State Parks commends the leadership of the MLPA initiative, the South Coast Regional Stakeholder Group and the Blue Ribbon Task Force for all of the hard work they have done. We appreciate the opportunity to provide the Commission our evaluations and recommendations and look forward to working with the Department of Fish and Game to manage and protect the network of MPA.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ruth Coleman".

Ruth Coleman
Director

cc: Mike Chrisman, Secretary, Natural Resources Agency
Brian Baird, Assistant Secretary, Natural Resources Agency
Ken Wiseman, Executive Director, MLPA Initiative
John McCamman, Acting Director, Department of Fish and Game