UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 6, 2006

Chris Mobley
CINMS Superintendent
NOAA National Marine Sanctuary Program
113 Harbor Way, Suite 150
Santa Barbara, CA 93109

Subject: Channel Islands National Marine Sanctuary (CINMS) Draft Environmental Impact Statement (DEIS) for the Consideration of Marine Reserves and Marine Conservation Areas, California (CEQ # 20060330)

Dear Mr. Mobley:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The DEIS analyzes the impacts of establishing marine reserves and marine conservation areas in the Channel Islands National Marine Sanctuary (Sanctuary) for the protection of Sanctuary biodiversity and to complement an existing network in the Sanctuary established by the State of California. The DEIS also evaluates amending the Pacific Coast Groundfish Fishery Management Plan by prohibiting the use of bottom contact fishing gear in Federal waters of the proposed zones. Alternative 1a is the National Oceanic and Atmospheric Administration's (NOAA) preferred alternative.

Based on our review, we have rated the DEIS as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions"). EPA applauds this effort to address marine biodiversity loss and to support long-term ecosystem resiliency and health in the Sanctuary. The DEIS states that Alternative 2 provides even greater ecological benefits than the preferred alternative. Alternative 2 is 47 square nautical miles larger than Alternative 1a, includes unique biophysical characteristics, and increases potential habitat connectivity along the south side of the northern Channel Islands. We encourage NOAA to select this alternative if economic impacts are deemed acceptable. The DEIS states that proposed Essential Fish Habitat (EFH) does not include all areas proposed in Alternative 2, and synergistic effects are likely to occur in areas where the proposed marine zones and fishery closures are spatially consistent. It is not clear why Alternative 2 was developed with spatially inconsistent EFH. If Alternative 2 is selected, NOAA should explore the possibility of altering EFH in this alternative to match its marine zones.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for

public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3988 or Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov .

Sincerely,

/s/

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosure: Summary of EPA Rating Definitions