Question 1 — Do You Support the Vision and Objectives?

The definition proposed in Section 2 is not what we expected. We had assumed that a Marine Protected Area meant just that — **protected**. Yet on examining this section the definition given Marine Protected Areas surprisingly includes recreation sites, boat anchorages and areas used for commercial and sport fishing!

However the proposed MPA definition does allow for a zoning and regulation system that could provide additional stricter protection zones within the MPA. We appreciate that your very broad definition of MPAs will make it easier to sell the concept to commercial interests. It will also allow for larger areas to be designated as Marine Protected Areas with appropriate zoning within them. It is essential that the strict zoning and regulations be applied to as large an area as possible if there is to be any meaning to “protected” in the designation. We hope that your definition of MPAs means that you can get on with the job of protection sooner rather than later.

The whole process seems to be moving very slowly. The list of nine legislative tools, twelve designations and four agencies given in Appendix B is one explanation of why the process moves so slowly. In this regard we can appreciate your discussion paper, as a combined presentation from the various government agencies, does represent significant progress.

However to sell MPAs to the public the language used must be much clearer. As it now stands the document is confusing. A plan diagram showing an imaginary representative MPA, including specific zones within and clear explanation of the restrictions of each zone would be helpful. This would show the large MPA with minimal protection standards and then the more restrictive zones, including the smaller “Harvest Refugia”. The benefits of no-take zones should be carefully explained — acting as a refugia where depleted populations can rebuild and also from where dispersal will contribute to natural repopulation of other areas. Even the restriction of no-take should be explained in clearer more specific terms. For example would it also mean no boating, no power boating, commercial fish boats only, or what? For intertidal areas, would it in some instances mean no foot access at low tides? The question of site management of the strict sanctuary or no-take zones is far more difficult than on land parks because access can be
easily gained from any point on the water by boat. This is far harder than a site where natural geographic features restrict access to only a few or only one location.

**Question 2 – Do you support the Minimum Protection Standards?**

The Discussion Paper proposes minimum protection standards to prohibit ocean dumping, dredging, and exploration/development of non-renewable resources. We strongly urge you to add restrictions on bottom trawling, open net fish farms, and introduction of alien species to this list of minimum protection standards. There should also be restrictions to ensure high standards of water quality are maintained.

**Question 3 – Do you support the Process for MPA identification, assessment and decision-making?**

Yes. The six guiding principles are well put: working with people, respecting First Nations, fostering ecosystem-based management, learning-by-doing, managing for sustainability, and taking a precautionary approach. It would be best to carefully define taking a “precautionary approach” so that it is clear it means where the knowledge base is limited care will be taken to ensure more is protected, and that it does not mean acting slowly to designate MPAs!

We assume that “working with people” includes scope for a small group of people to put forward a candidate marine area for protection, particularly where there is no comprehensive planning process involved. For example, the objectives of the MPAs must not become so technical in the “proof” of their value that a nice intertidal area used by local school kids and recommended by a local community, would not be considered.

Under “managing for sustainability”, we recommend that the benchmark for sustainability should not be what is there now in 1999, but should reflect the historical abundance of the last century and earlier for certain decimated species such as sea otter.

We question whether the comprehensive planning process now underway for the Central Coast has enough public discussion and information dissemination to count as adequate assessment for MPA planning for this extensive area. Our organization is not well informed of considerations or recommendations being made by this group with respect to MPAs and we can only assume the general public is not at all aware. Additional meetings for public discussion of possible MPAs under consideration for the Central Coast should be held.

**Question 4 – Do you support an Inter-Governmental Coordinating Body?**

Yes, due to the many jurisdictions involved, such a body is necessary. However please streamline wherever possible. It should not be unwieldy and should not take another
year to agree on its Terms-of-Reference! Would it not be most effective to continue with the body already established?

**Question 5 – Should some form of public advisory committee be established?**

Yes, a working group with key representatives would likely be most efficient, together with wider based public meetings and discussion at appropriate planning stages. The public advisory committee should not be allowed to be a core group only discussing among themselves, but each member must be committed to report back and discuss with their larger parent body. Refer to our comment on Central Coast planning and the need for wider based public meetings there.

**Question 6 – Do you support tailored MPA planning processes?**

Again the wording seems reasonable. How the public participation is handled will be a critical factor in their success.

**Question 7 – Do you support the learn-by-doing approach?**

Yes, however the designation of pilot project sites seems to be very slow in happening. What are the hold ups? We don’t understand the reasoning to designate Race Rocks as an MPA when it is already an Ecological Reserve. The reasons should be fully explained. With respect to Gabriola Passage, since this has been under consideration for so long, what is the hold up? For such a small MPA, the whole area should be under a no-take restrictive zoning.

Our suggestion for each of the four pilot projects chosen is to give clear explanation on why they were chosen and what government is hoping to learn-by-doing.

We also support the interim management guidelines where they are necessary to immediately protect an area under threat.

**Question 8 – Should we define targets for MPAs?**

It is difficult to define firm targets when our knowledge of the marine realm is limited and we do not understand the possible size of any one representative MPA and what restrictive zoning it may have. A common sense approach would be to begin by protecting known, key areas and then as studies are completed, fill in representative areas for each habitat, ecosystem or community type. Always remain flexible to review progress made and as knowledge increases realize that original targets may need to be modified or shifted.