



## **JOINT MANAGEMENT PLAN REVIEW**

### **Scoping Comments: Coastal Development – Coastal Armoring**

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The MBNMS received a variety of comments during the public scoping process about coastal armoring throughout the region. It also received a large number of more general comments about the need for conservation of marine resources. A summary of these comments is presented below. This is meant to be a qualitative rather than quantitative display of comments received, as in some cases essentially the same comment was received multiple times from different individuals.

#### **Scoping Comments: Coastal Armoring**

- Concerned about coastal armoring. (MB/GF)
- Armoring of the shoreline can lead to loss of sand flow to beaches, beach erosion, impact to surf breaks, loss of public access to beach, and aesthetic impacts. (MB/GF)
- Thirty percent of the coastline in northern Monterey Bay is already armored. Hardening of the coast disrupts natural processes, and sometimes destroys sensitive habitat. (GF/MB)
- Sanctuary should ensure that shoreline armoring is appropriately carried out. Sensitive areas where armoring should not occur must be identified, as should more developed areas where armoring is appropriate. (MB)
- Shoreline armoring should be prohibited in the sanctuaries, because it leads to the transfer of wave energy to another location and encourages development too close to the water. (GF/MB)
- Sand from the Guadalupe oil field cleanup project, could be used for beach nourishment projects. (MB)
- No emergency permits should be given for coastal armoring projects. (MB/GF)
- Concerned that riprap being used on the golf course at the Ritz-Carlton is causing erosion of adjacent land. (MB)
- Stronger regulations against coastal armoring. (MB)
- Create Sanctuary wide policy (with other agencies) to address shoreline management in a manner that protects and restores natural shorelines and processes. (MB)
- Investigate alternatives to coastal armoring. (MB/GF)
- Sanctuaries should be more involved in coastal development issues such as golf courses and sea walls. (MB/GF)
- More coordination/collaboration and active problem solving among agencies, to address the issue of sediment management. (MB/GF)
- Sanctuary should be involved in the state Coastal Sediment Management Working Group. (MB)
- Sanctuaries should investigate erosion rates along San Mateo coast. (MB)
- No wharf extensions or additional breakwater structures. (MB)



### **Scoping Comments: Ecosystem Protection and Biodiversity Conservation:** (General category)

- Need more conservation in general. (All)
- Goal of MBNMS should be to protect and preserve. (MB)
- It is much better economically (and easier) to save species and ecosystems before they become endangered or compromised in some way. Protection now makes the most long-term sense. (All)
- Concerned about loss of species biodiversity and abundance, impacts to habitat, impacts to predator/prey interactions. (All)
- Term “sanctuary” is a misnomer. True sanctuary status is nearly impossible to establish in the marine environment, save some marine caves or extreme deep-water sites populated only by resident species and devoid of any effects of ocean current and free from impacts of pollution. (All)
- Coastal habitat restoration is extremely important. (GF and MB)
- Consider regulation with long-term vision (erosion lasts longer than 50 years). (All)
- Management should strive for long-term sustainable use (e.g., not taking juvenile fish). Appreciates regional approach to scoping process, to capture local issues. (All)
- The Sanctuary needs to find the right balance between use and protection. (All)
- More protection is needed in general for the ecosystem and biodiversity. (All)
- Resource protection should be the main priority. (All)
- Strengthen resource protection; do not allow local control to undermine this. (All)
- Expand sanctuary concept to unify and make consistent resource protection, for better management of resources. (All)
- Use holistic management practices that focus on entire watersheds. (All)
- Sanctuary should look at the big picture of overall environmental impacts, and manage the resources appropriately. For example trawling has significant impacts, yet much more attention is given to fiber optic cables. (All)
- Sanctuaries should ensure comprehensive coverage with overlapping jurisdiction, to improve resource protection. (All)
- Sanctuaries should continue to provide consistent habitat protection. (All)
- Recognize intrinsic values and aesthetics as well as ecological values. (All)
- Create more of a policy balance between conservation and use, with a strong educational program being the key to achieving this balance. (All)
- Sanctuary should consider ecological trade offs. In some cases terrestrial impacts from alternatives to Sanctuary restrictions are much worse. (All)
- The Sanctuary should be involved in enhancing near-shore ecosystems through research and staff involvement in other agency processes. (MB/GF)
- We urge the National Marine Sanctuary Program to ensure that any issues considered during JMPR process be considered in the context of the National Marine Sanctuaries Act’s primary goal of resource protection. We strongly advocate for the adoption and enforcement of strong policies and regulations that provide maximum protection of Sanctuary resources. (All)
- Revised management plans should contain directives and timelines for developing specific action plans focused on protecting, and where necessary, restoring, natural habitats,



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populations, and ecological processes. Plans should also contain specific directives and management measures on certain issues. (All)

- Integrate marine research in resource management decisions. (All)
- Try thinking of the sanctuary as a gift as well as a resource. (All)
- Remember to think and plan as systemically as possible, not just about distinct and separate issues, but about all the connections and boundaries and overlaps: coastlines and jurisdictions and regions and ecosystems and partnerships and nexuses and all those connections. (All)
- “Seamlessness” should be the goal of Sanctuary management. (MB)
- Sanctuary should work with land management agencies. (MB, GF).

### **Coastal Armoring Comments Received from the Sanctuary Advisory Council:**

- Need MBNMS Policy to minimize marine impacts. This falls in line with inter-agency coordination. Must view issue in light of impacts to habitats and species below mean high tide line.
- Work with Coastal Commission to reduce emergency permitting and enact Sanctuary Armoring Policy, which avoids sensitive habitat. There is a growing trend to respond to eroding shorelines with coastal armoring and structural controls, damaging coastal habitats, depriving beaches of sand and escalating erosion of adjacent beaches. Utilize a comprehensive approach to this issue with the CCC and other state and federal agencies as appropriate to minimize or reduce coastal armoring