

**Sanctuary Advisory Council
Research Activity Panel
Monterey Bay National Marine Sanctuary
299 Foam Street Monterey, CA 93940 (831) 647-4213**

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UC Santa Cruz

Gary Sharp, Ph.D.
Center for Climate/
Ocean Resources Study

September 7, 2001

Stephanie Harlan, SAC Chair and
William Douros, Superintendent
Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, CA 93940

Dear Bill and Stephanie:

The RAP feels that charging fair market value for laying fiber optic cables through the Monterey Bay National Marine Sanctuary would be a logical way to cover the costs associated with monitoring environmental impacts of the cables, but it has no opinion on what that amount should be. We don't believe the determination of a fair market value is necessarily a science-based issue. So from my perspective as RAP representative I don't feel well-qualified to respond to the new fair market analysis.

The RAP's main concern relates to the environmental impact of cable laying, presence, maintenance, and removal for each cable project, and for the cumulative effects of several projects. Specific concerns include the potential for erosion and entanglement. Cables have never been found to be completely buried and so may pose a chronic hazard to Sanctuary resources. The RAP believes that cable companies proposing to lay cables through the sanctuary must make a compelling case that there will be no significant impact. An important condition for approval should be the requirement for monitoring environmental impact of the cable, and a key element of the monitoring program should be an annual submarine video survey along the full length of their installation. The cable company will necessarily need to do maintenance and repairs, and an MBNMS staff person should monitor each/every activity, as a requirement for access by any user group that is likely to disrupt the sea floor through installations of equipment, cables, or other physical devices. There will be a significant cost associated with the monitoring itself, with the MBNMS staff and resources needed to evaluate the monitoring process and results, and with other aspects of monitoring cable impacts. Assessing cable companies' fair market value would be a logical strategy to recover these costs. A cost analysis for the aforementioned surveys should be conducted and added to (or incorporated into) the fair market value for laying fiber optic cable (e.g. cost per square foot).

The Sanctuary Advisory Council's Research Activity Panel is comprised of 22 representatives from government agencies, research organizations, and academic institutions concerned with the resources of the Monterey Bay National Marine Sanctuary. The Research Activity Panel advises the Council and Sanctuary Superintendent on matters of scientific and research related policies and provides a link between the community and Sanctuary management.



Cables may also be used for research, monitoring, resource management and other non-commercial purposes. The RAP feels these activities are different than commercial cable projects as there are related benefits to Sanctuary resources. In these cases, the potential damage caused by a cable may be compensated by resource management benefits, and a finding of no significant impact may not be necessary. The RAP would like to see the MBNMS work closely with research institutions (e.g. MBARI, NPS) to use research cables as test cases to study potential cable impacts to natural resources.

As the research representative on the SAC, I will consider, evaluate and vote on any proposed language or position adopted by the SAC based on my best judgment as a scientist and on my understanding of the collective feelings and opinions of the scientific community. Feel free to share this letter with others if you wish.

With best regards,

A handwritten signature in black ink, appearing to read "Chris Harrold". The signature is fluid and cursive, with the first name "Chris" written in a larger, more prominent script than the last name "Harrold".

Chris Harrold
Chair, Research Activity Panel