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Commercial Fishermen of Santa Barbara

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PFMC

March 10 , 2015

William Douros
West Coast Regional Director
NOAA Office of National Marine Sanctuaries
99 Pacific Street, Suite 100F
Monterey, CA 93940

RE: OPPOSITION TO PROPOSED NOMINATION OF NEW CENTRAL CALIFORNIA NATIONAL MARINE SANCTUARY ("CHUMASH SANCTUARY")

Dear Mr. Douros;

As you know, our Association is composed of small-boat fishermen who land a wide variety of fresh, local seafood to coastal communities throughout the Southern California Bight. We have worked hard to bring our fisheries into sustainability over the last two decades and we believe we are "leading the pack" in this regard for most of our fisheries.

We write you now to express our opposition to the proposal to designate a new National Marine Sanctuary, called the Chumash Sanctuary along the central coast that would link Channel Island National Marine Sanctuary (CINMS) and Monterey Bay National Marine Sanctuary (MBNMS) into one large National Marine Sanctuary (NMS). This essentially would put the entire California coastline (and traditional fishing grounds) from about the Gulf of the Farallones to Gaviota and the Channel Islands into NMS designation.

We have been involved in CINMS since its inception, and understand well the history of development of support for CINMS. We are also aware of the similar history of development for designation of the MBNMS. When both of these Sanctuaries were proposed, NMS staff enlisted the help of local elected and the commercial fishing community for support. In the case of Channel Islands, commercial fishermen were promised by NMS staff and Congressman Bob Lagomarsino that the Sanctuary would never regulate commercial fishing, but leave that to the Department of Fish and Game and National Marine Fisheries Service (NMFS). Likewise, when support was sought for MBNMS, NMS staff and Congressman Leon Panetta promised commercial fishermen around Monterey that the Sanctuary would never regulate commercial fisheries.

As it turns out, both of these promises were broken, repeatedly, as the NMS prosecutes its clear policy of "protection first, resource use last." All one has to do to verify this result is to read the minutes of the CINMS MRWG (Marine Reserves Working Group), prima fascia evidence that CINMS took a stakeholder stance in creating no-fishing zones at Channel Islands, locking us out of about 20% of prime traditional fishing grounds for

members of our Association. We worked hard with the rest of MRWG to come up with a reserve network that satisfied the marine protection issue while minimizing economic harm to our fisheries, to no avail. The entire process was short-circuited back to the Department of Fish and Game and the NMS for state and federal no-fishing zone designation. Studies have shown that there are economic impacts to our fisheries at the Islands. In particular, one study indicated a 5-30% drop in catch per unit effort for our lobster fishermen. And so far, the much-touted "spillover effect," after over a decade, has yet to be observed for finfish or shellfish either.

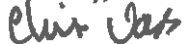
Given the economic harm to commercial fisheries of Sanctuary designation at CINMS and MBNMS, we are hard-pressed to conclude that the Chumash Sanctuary "would be different, this time." Facts are stubborn things, and history has proven otherwise.

There are some reasons we supported Sanctuary designation in the first place, notably further prohibiting offshore oil development in the Santa Barbara Channel around the Islands. And if the Sanctuary were effective in the business of protecting water quality, for example, or had some way to effect a reversal of ocean acidification, we would certainly support those goals too. But history has not indicated that these results have come from Sanctuary designation. We would love to work with the CINMS and MBNMS staff to work toward these important conservation objectives. Likewise, we would be happy to work with staff in these Sanctuaries to improve the consistency of regulations for commercial fisheries in Sanctuary waters. We invite staff to contact us to work with us to achieve these objectives.

Bottom line: history has proven that the designation of a National Marine Sanctuary in waters traditionally fished by our members and others, has not benefitted our fisheries but instead has had severe economic consequences to our membership. We cannot, in good conscience, given this track record, support further Sanctuary designation along the California coast.

Please feel free to contact us at any time to discuss any of the above information. Again, we would be happy to work with you collaboratively to ensure continued access to fresh local seafood for our coastal communities.

Sincerely,



Chris Voss,
President

C: Congresswoman Lois Capps

Senator Diane Feinstein

Senator Barbara Boxer

State Senator Hannah-Beth Jackson

State Senator Bill Monning

Assemblyman Das Williams

Assemblyman Katcho Achadjian

Don McIsaac, Executive Director, Pacific Fisheries Management Council

Zeke Grader, PCFFA