



Southern California Trawlers Association

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Supplemental Open Public Comment 3

March 2015

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

PFMC

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

Dear Bill;

As you know, our Association is composed of small-boat trawl fishermen who land California halibut, sea cucumbers and ridgeback prawns from San Francisco to San Pedro harbors. We have worked hard to bring our fisheries into sustainability over the last two decades, and numerous recent regional studies have supported this result.

We write you at this time, understanding the early nature of the process, to indicate our opposition to the proposal to designate a new National Marine Sanctuary ("Chumash Sanctuary") encompassing the Central California coast and contiguous with Monterey Bay National Marine Sanctuary and Channel Islands National Marine Sanctuary. This essentially would put the entire California coastline (and traditional fishing grounds) from about the Gulf of the Farallones to Point Conception into NMS designation.

History is our guide for taking a stance opposing the additional designation. When the Monterey Bay National Marine Sanctuary was under the designation process, NMS officials as well as then-regional Congressman Leon Panetta actively solicited the support of key commercial fisheries representatives in the area. This solicitation came with the promise that the Sanctuary would never regulate commercial fisheries, but would leave that to the National Marine Fisheries Service and the California Department of Fish and Game. History has proven otherwise. It was on this basis, and with this clear intent, that commercial fisheries groups in the Monterey Bay lent their support to sanctuary designation. With the clearly anti-commercial fishing stance of MBNMS Superintendents over the years in public venues, and with the revisions in Management Plans over this timeframe, it has become abundantly clear that the protection of all natural resources within Sanctuary Boundaries has priority over all other issues, including multiple use and fisheries conservation (as opposed to protectionism). To argue otherwise contradicts published and videotaped testimony of Sanctuary staff and managers over the last three decades.

Similarly, during the designation process for Channel Islands National Marine Sanctuary, proponents and Sanctuary staff, together with then-Congressman Robert Lagomarsino, solicited the support of key fisheries representatives in the Santa Barbara Channel. The same promise was made: the Sanctuary would not do fisheries management, but instead would leave that to the ministrations of NMFS and DFG. History has again put the lie to that promise. With the advent of the marine reserve concept, CINMS took the lead, several years in advance of the State of California, in developing no-fishing zones

around the waters of the CINMS. Our fisheries groups supported the concept of wilderness areas, just like on land, but what resulted, ultimately, bore no semblance to simple wilderness designations. It was clear during the Marine Reserves Working Group process (in which we participated and supported initially) that ocean NGOs were pushing Sanctuary staff to become stakeholders in the MRWG process, and the resulting array of no-take zones were harmful to commercial fisheries of the Channel. One case in point is the "Footprint" no-take zone between Anacapa and Santa Cruz Islands. It makes absolutely no sense to prohibit the take of swordfish in that area "to protect the bottom." No reasonable scientific evidence was ever presented by the Science Advisory Panel or any other source during the process that linked these highly migratory species to benthic ecosystems, and as a practical matter, the fishery was harmed. Again, to argue that CINMS has not had regulatory effects on commercial fisheries is disingenuous at best. This is just one example. Another one, while we're on the subject, is the effect the no-take zones have had on the lobster trap fishery at Santa Cruz Island. A study published by a UCSB graduate student on the effect of 6 years of closure with the marine reserve array around that island found that a 5-30% drop in catch per unit effort was evident in the data. Another study of lobster in/out of the reserves concluded that there was no evidence of the highly touted spillover effect that had measurable benefit to fisheries after a similar time, even though lobster were more numerous and populous inside the reserves (a no-brainer conclusion that any 6th grader could observe).

Given the economic consequences of Sanctuary designation in both Monterey and the Santa Barbara Channel, it would be difficult for us to come to the conclusion that the Chumash Sanctuary "would be different, this time." History has proven otherwise.

Groundfish trawling along the California coast has been greatly diminished by the existing regulations promulgated by the Pacific Fisheries Management Council under the Groundfish Management Plan. A buyback plan eliminated half the boats in the fleet, and then the Nature Conservancy came to Morro Bay and bought out all but one of the remaining groundfish boats in that port. Subsequent to these events, the remaining groundfish trawl vessels with Class A permits have since been certified as sustainable fisheries for 16 species by the Marine Stewardship Council. Annually the National Marine Fisheries Service issues a "state of the U.S. fisheries" report, and these reports have illustrated a clear trend: the number of fisheries reported as "overfished" has steadily diminished, from over 50% a decade or two ago to less than 9% in the last report (2013). The State of California, under the Marine Life Management Act statutes, publishes a "State of the Fisheries" report annually. The last report indicated the view of the Department of Fish and Wildlife there are no currently fished commercial species that are overfished. Given this happy state of affairs and increased regulatory oversight on commercial fisheries, we see absolutely no reason that additional protection will further benefit conservation of California fisheries. Since the Sanctuary is principally in the business of protection, we cannot in good conscience and understanding the status and health of California fisheries in this decade, support additional levels of protection.

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 might think differently. 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 together in this manner.

To summarize, 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,



Mike McCorkle,
President

C: Congresswoman Lois Capps

Senator Diane Feinstein

Senator Barbara Boxer

State Senator Hannah-Beth Jackson

State Senator Bill Monning

Assemblyman Das Williams

Assemblman Katcho Achadjian

✓ Don McIsaac, Executive Director, Pacific Fisheries Management Council

Zeke Grader, PCFFA