

Sanctuary Advisory Council

CHANNEL ISLANDS NATIONAL MARINE SANCTUARY

July 21, 2017

Member/Alternate

Tourism

Andrea Mills / Joshua Travers

Business

Michael Cohen / Capt. Kip Louttit

Non-Consumptive Recreation

Ben Pitterle / Tony Knight

Commercial Fishing

Stephanie Mutz / John Hoadley

Recreational Fishing

Capt. David Bacon / Merit McCrear

Education

Amanda Allen / Cliff Rodrigues

Research

Dr. Robert Warner / Dr. Mark Steele

Conservation

Kristen Hislop / Greg Helms

Public At-Large 1

Phyllis Grifman / Judy Willens

Public At-Large 2

Rich Block / Eric Kett

Chumash Community

Luhui Isha Ward / Alicia Cordero

National Marine Fisheries Service

<vacant>

National Park Service

Russell Galipeau / Travis Poulson

U.S. Coast Guard

CDR Lushan Hannah / CDR Jason Brand

Bureau of Ocean Energy Management

Donna Schroeder / <vacant>

U.S. Department of Defense

Walter Schobel / Claudia Makeyev

California Department of Fish and Game

Dr. Julia Coates / John Ugoretz

California Resources Agency

Jenn Eckerle / Paige Berube

California Coastal Commission

Dr. Jonna Engel / Molly Troup

County of Santa Barbara

Dianne Black / Errin Briggs

County of Ventura

Danielle Tarr / <vacant>

Channel Islands National Marine Sanctuary

Chris Mobley / Mike Murray [non-voting]

Monterey Bay National Marine Sanctuary

Paul Michel / Karen Grimmer [non-voting]

Gulf of the Farallones National Marine Sanctuary

Maria Brown / Brian Johnson [non-voting]

Chair: Dianne Black

Vice Chair: Phyllis Grifman

Secretary: Michael Cohen

Mr. Chris Mobley, Superintendent
University of California Santa Barbara
Ocean Science Education Building, MC 6155
Santa Barbara, CA 93106

Dear Superintendent Mobley,

I write to you on behalf of the Channel Islands National Marine Sanctuary Advisory Council to offer our comments on Executive Order 13795, regarding National Marine Sanctuaries and Monuments that have been designated or expanded in the 10 years prior to the Executive Order, or since April 28, 2007¹. As this letter describes, the 2007 boundary adjustment did not significantly expand the Channel Islands National Marine Sanctuary (CINMS), did not have significant impacts on costs of management, did follow thorough review protocols, and did not have significant opportunity costs to energy and mineral exploration. Therefore, we do not support efforts that would rescind that adjustment.

National Marine Sanctuaries are designated as special places for species close to extinction, sensitive habitats, shipwrecks, and maritime heritage artifacts. Many valuable commercial and recreational activities, such as fishing, shipping, and tourism occur in the CINMS, the waters of which are also culturally and spiritually significant to indigenous Chumash people. A comprehensive ecosystem-based management approach is used to promote long term conservation of sanctuary waters, wildlife, habitats, and cultural resources, while allowing compatible human uses. The CINMS's remote, isolated position at the confluence of two major ocean currents creates remarkable biodiversity. The mingling of cool, nutrient-rich waters from the north with warm currents from the south form a dynamic transition zone that is home to a myriad of sea life from microscopic plankton to blue whales.

As you know, the CINMS Advisory Council's 21-member body brings together community members and representatives from government agencies to advise you, as the Sanctuary Superintendent, and the NOAA National Marine Sanctuaries Program. The Executive Order requires NOAA to examine three issues associated with any designations or expansions in the time period since April 28, 2007. This letter constitutes the CINMS Advisory Council's response to these issues.

¹ The opinions and findings of this letter do not reflect the position of the Federal agencies on the Sanctuary Advisory Council because they are bound by EO 13795.

First, in 2007 a boundary adjustment was made to the CINMS in order to accommodate a management decision to create marine protected areas. The purpose of this boundary adjustment was not to expand the sanctuary and resulted in a modest, approximate 15 square mile expansion, or 1% of the total Sanctuary, and did not have any budget impacts or increase to the cost of management.

Second, the CINMS boundary adjustment followed review protocols required by NOAA and included extensive public comment. NOAA held two public hearings on the proposed rule and Draft Environmental Impact Statement and received written and/or oral testimony from over 30,000 individuals, a vast majority in support of the adjustment. Comments from the State of California were sought, and the California Coastal Commission held a hearing on the boundary adjustment proposal that included representation from the California Department of Fish and Game (now California Department of Fish and Wildlife). Thus, the expansion was fully analyzed in consultation with appropriate agencies and the public.²

Third, the opportunity costs associated with potential energy and mineral exploration were not considered in this boundary adjustment because, again, the boundary adjustment did not result in significant expansion (approximately 1%). The areas into which the sanctuary was expanded did not include any outer continental shelf lease areas. Thus, the impacts to potential energy and mineral exploration are insignificant.

The Executive Order's focus on energy and mineral exploration does not address the many socioeconomic benefits that Sanctuaries and Monuments provide to our local communities and economies, including fishing, whale watching, boating, and diving. These activities have a significant, positive socio-economic impact on our region. A NOAA study of the economic impacts of the recreational fishing in the CINMS revealed that from 2010-2012, the three-year average economic impact just from marine recreational fishing in the CINMS amounted to "more than \$31.4 million in output, \$18.7 million in value added, \$11.0 million in income and more than 200 jobs."³ Similarly, a NOAA economic study of commercial fishing found that "landings from CINMS generated \$27,275,539 in harvest revenue, \$45,396,225 in output, \$30,894,393 in value added, \$27,836,552 in total income and 659 full and part-time jobs across five counties."⁴ Additionally, the CINMS benefits businesses that offer opportunities to visit the area for non-consumptive enjoyment, such as sailing, kayaking, sight-seeing, and diving. As a driver for tourism in our area, the CINMS supports business such as hotels and restaurants, transportation, and other tourism amenities in Santa Barbara and Ventura counties. Overall, the value of the Sanctuary for the regional economy cannot be determined solely by examining opportunities for energy and mineral extraction, particularly considering the potential environmental impacts of those industries and the concomitant economic threats posed by unintended spills or pollutants.

² National Marine Sanctuary Program. 2007. Channel Islands National Marine Sanctuary, Final environmental impact statement for the establishment of marine reserves and marine conservation areas. Available at: <http://channelislands.noaa.gov/marineres/pdfs/feis.pdf>

³ Leeworthy, V.R. and D. Schwarzmann. 2015. Economic impact of the recreational fisheries in local county economies in the Channel Islands National Marine Sanctuary 2010, 2011, 2012. NOAA's Office of National Marine Sanctuaries Conservation Science Division. Available at:

<http://sanctuaries.noaa.gov/science/socioeconomic/channelislands/pdfs/cinms-rec-report.pdf>

⁴ Leeworthy, V.R., D. Jerome, K. Schueler. 2014. Economic impact of the commercial fisheries in local county economies from catch in the Channel Islands National Marine Sanctuary 2010, 2011, 2012. NOAA's Office of National Marine Sanctuaries Conservation Science Division. Available at:

http://sanctuaries.noaa.gov/science/socioeconomic/channelislands/pdfs/cinms_fishing_report.pdf

On behalf of the CINMS Advisory Council, I request that you submit these comments in response to NOAA's call for comments on the Executive Order.

Sincerely,

A handwritten signature in blue ink that reads "Dianne M. Black". The signature is written in a cursive style and is positioned above a horizontal line.

Dianne Black, Chair
Sanctuary Advisory Council

enclosure: Council voting record on adoption of this letter and approval for its dissemination.

ATTACHMENT: Voting Record for council letter from Channel Islands National Marine Sanctuary Advisory Council concerning EO 13795, July 21, 2017

<u>Council Seat</u>	<u>Name of voting representative</u>	<u>Vote</u> <i>(or Absent)</i>
Tourism	Andrea Mills (member)	Y
Business	Michael Cohen (member)	Y
Non-Consumptive Recreation	Ben Pitterle (member)	Y
Commercial Fishing	Stephanie Mutz (member)	Absent
	John Hoadley (alternate)	
Recreational Fishing	Capt. David Bacon (member)	N
Education	Amanda Allen (member)	Y
Research	Dr. Mark Steele (alternate)	Y
Conservation	Kristen Hislop (member)	Y
Public At-Large1	Phyllis Grifman (member)	Y, Y
	Judy Willens (alternate)	
Public At-Large2	Rich Block (member)	Absent
	Eric Kett (alternate)	
Chumash Community	Luhui Isha Ward (member)	Absent
	Alicia Cordero (alternate)	
National Marine Fisheries Service	Vacant	Absent
	Vacant	
National Park Service	Russell Galipeau (member)	Abstain
U.S. Coast Guard	CDR Lushan Hannah (member)	Abstain
Bureau of Ocean Energy Management	Donna Schroeder (member)	Abstain
U.S. Department of Defense	Walter Schobel (member)	Abstain
California Dept of Fish & Wildlife	Dr. Julia Coates (member)	Abstain
California Resources Agency	Jenn Eckerle (member)	Y
California Coastal Commission	Dr. Jonna Engel (member)	Y
County of Santa Barbara	Dianne Black (member)	Y
County of Ventura	Danielle Tarr (member)	Absent
	Vacant	

YES: 11 ABSTAIN: 5 NO: 1