



PO Box 323
Morro Bay, CA 93433

September 22, 2015

Mr. John Armor, Acting Director
NOAA National Marine Sanctuary Program
1305 East-West Highway, 11th Floor
Silver Spring, MD 20910

**RE: COALITION FORMED TO OPPOSE NOMINATION OF THE CHUMASH HERITAGE
NATIONAL MARINE SANCTUARY**

Dear Director Armor,

The Our Protected Coast Coalition is a grass roots organization recently formed after concerned citizens decided to concentrate their efforts and oppose the proposed National Marine Sanctuary along the coast of San Luis Obispo and Northern Santa Barbara Counties. We have attached a list of those opposed to a sanctuary (to date), to confirm the broad based community support garnered in just the very few short months. We understand from Mr. Douros that public input, in this phase, will end on October 5, 2015. Accordingly, we have included below the number of "pending" groups that are in process of voicing their opposition.

The following broad based community groups will be meeting with Our Protected Coast Coalition members and likely voting in opposition of the sanctuary in the upcoming weeks:

- Several State and local Elected Official's
- San Luis Obispo & Santa Barbara County Regionally Based Industry Association's
- San Luis Obispo County Board of Elected Officials
- San Luis Obispo Locally Appointed Advisory Board and Commissions
- San Luis Obispo & Santa Barbara County Political Organizations
- San Luis Obispo County Industry Association/Union's
- San Luis Obispo & Santa Barbara County Agriculture Industry Association's
- San Luis Obispo County Municipality Government Boards
- Santa Barbara County Industry Association/Cattle
- San Luis Obispo & Santa Barbara County (Municipal) Chambers of Commerce

Additionally, our outreach in the community includes interviews with regionally significant talk-radio shows, and tabling at regional special events (booth space).

Some of our main points on why the Our Protected Coast Coalition is opposed to a National Marine Sanctuary on the Central Coast include:

- Proponents tout the sanctuary as a permanent barrier in preventing offshore oil drilling; however, as you know the National Marine Sanctuary (NMS) Act contains no prohibition against oil, gas, wind and wave energy projects. While all of the existing west coast NMS's have designation documents that include a ban on oil and gas exploration or development, this ban is cannot be called permanent, as Congress and the President can overrule it.
- Many people do not see the need for another layer of federal regulation, especially from an agency with the vague title of "sanctuary", which is typically defined as a place where hunting and fishing are disallowed and human impacts are discouraged. Under the NMS Act, it is federal employees, not our local communities, who ultimately decide what human activities are "compatible" with resource protections.
- Sanctuaries will affect local farmers, ranchers and vintners in that if an activity occurs outside sanctuary boundaries (such as up a tributary) and the sanctuary manager believes the activity harms sanctuary resources, they can take civil action to stop the activity. Sanctuaries become involved in monitoring stream run-off to the ocean from crops and livestock. The Regional Water Quality Control Board must remain the agency that sets science-based water quality standards through its robust public process.
- The National Marine Sanctuary Act (NMSA) provides NMS's/Secretary of Commerce with the ability to overrule the Regional Fisheries Management Council. While sanctuaries don't "regulate" fishing, they definitely affect local fishermen and fishing grounds. Sanctuaries encourage and establish Marine Protected Areas, which are no-fishing zones. Our direct experience in California shows that sanctuary actions led to the removal of some of the most productive habitat from fishing, resulting in safety-at-sea implications for fishermen, who are forced to travel farther to fish, and expend more fuel to do so.
- Sanctuaries require permitting for dredge material disposal, harbor/pier repair work, and even scientific research. In Monterey Bay, the NMS staff issues up to **65 permits monthly**. Many of these are for minor "disturbance of the seafloor" activities. Scientists who need to extract small amounts of material from the seafloor must get a permit. In the case of dredging, in Monterey a permit was once required to gather **4 cups of sand** from the ocean floor to analyze.

- Sanctuary proponents have claimed extensive economic benefits from designation on the Central Coast, based on a report done in 2014. What sanctuary proponents fail to mention is the authors' repeated cautions that a precise estimate is not possible, and that any gains would be the result of "aggressive marketing," And that NMS designation may also create economic costs. In a 2013 study of the economic effects of the Thunder Bay National Marine Sanctuary in Lake Huron, a University of Michigan research team surveyed local businesses on employment, More than 90% cited no impact from the sanctuary on business operation decisions and more than 95% cited no impact on decisions to decrease or increase their workforces.
- Local control is another significant concern. While sanctuary management claims to honor local input, but in the Monterey Bay NMS, the local sanctuary advisory committee (SAC) is politically appointed and has not been representative of, or responsive to, the community or their concerns. It merely creates the illusion of a community voice in NMS management. The NMS managers control the agenda, representation, and limit to whom the SAC's may communicate.
- The Central Coast has rejected a National Marine Sanctuary several times with Mayors and City Councils and other groups expressing this opposition. Alaska recently defeated a sanctuary nomination due to similar lack of local support. In addition, the Oregon Ocean Policy Advisory Council studied the question of a NMS along the Oregon coast, but based on their findings, they unanimously—including "conservation" representatives-- voted against it. The Council included six Oregon coastal counties, two cities, and two port districts.
- There is a significant concern about the transparency of some NMS decisions and a pattern of cherry-picking science used development of some NMS regulations.

In closing, it is important to note that there are at least 18 other State and Federal regulations that already offer all the protection, and likely more, than is needed, due to our exceptional stewardship of our coastline and waters. It is the Marine Mammal Protection Act, the Magnuson-Stevens Fishery Conservation Act, and the Clean Water Act, that are protecting our resources. The NMSA is a minor law in ensuring ocean ecosystem health.

Sincerely,

Our Protected Coast Coalition members (see attached partial list)

cc: William Douros, Monterey Bay National Marine Sanctuary
Morro Bay City Council



Organizations Opposed to a Central Coast National Marine Sanctuary Designation

Morro Bay Commercial Fishermen's Organization
 San Luis Obispo County Cattlemen's Association
 Port San Luis Commercial Fishermen's Association
 Arroyo Grande Sportsman's Club
 Morro Bay Community Quota Fund
 California Marine Affairs and Navigation Conference (CMANC)
 Alliance of Communities for Sustainable Fisheries
 COLAB San Luis Obispo County (Coalition of Labor, Agriculture & Business)
 COLAB Santa Barbara County (Coalition of Labor, Agriculture & Business)
 Port San Luis Harbor District, Resolution No. 15-08
 City of Morro Bay Resolution No's 18-12, 27-03, 15-01 & 36-00
 City of Morro Bay Harbor Advisory Board

Businesses Opposed to a Central Coast National Marine Sanctuary Designation

Archie Fish
 Bernard Fish
 Big Sur Spot Prawns
 Blue Fisheries, Inc.
 Central Coast Ceramic Tile
 Ecological Assets Management, LLC
 F/V Dorado
 F/V Dusky
 F/V Katheryn H
 F/V Langosta II
 F/V Lucy L.
 F/V Maureen
 F/V Preamble
 F/V Princess
 F/V The Seeker
 F/V Twilight Lady
 Grassy Bar Oyster Company
 Haja Services
 Jerry's Marine & Tackle
 Magic Sea Products
 Morro Bay Landing

Nakazawa Fisheries, LLC
 Pacific Coast Strategies, LLC
 Patriot Sport Fishing
 Port San Luis Boatyard
 Rose Mar Fisheries
 South Bay Wild, Inc.
 Taurus Fisheries
 Virg's Landing

Individuals Opposed to a Central Coast National Marine Sanctuary Designation

Alan Alward
 Kevin Ames
 Aaron Appel
 Christopher Arend
 Diane Arnoldi
 Fred Arnoldi
 Carolyn Atkinson
 Kristi Balzer
 Craig Barbre
 Paul Bareis
 Bill Barrow
 Marlyse Battistella

John Beckham
Henry Bernard
Gayle Bickford
Donna Birnbaum
Herb Brinbaum
William Blue
Jamie Boucher
Bill Boucher
Pete Buompensieno
Peter Byrne
Joseph Campopiano
Henry Claassen
John M. Costello
Michael Cohen
Tiffany Cohen
Taineal Crenshaw
Russell Crenshaw
Roger Cullen
Linda L. Donnelly
Travis Evans
Joseph Fitzer
Roberta Fonzi
Drew French
Jeff French
Lori French
Lorrin French
John Gajdos
William Gerber
David Gilliland
Juan Guzman
Tom Hafer
Marcus Harmon
Brett Harradence
Savannah Holmes
John G. Holmes
Janice House
Stan House
Richard Hubbard
Sylvia Huth
Maria C. Jimenez
Micah D. Jimenez
Jerry Jones
Janice Jones
Amber Johnson

Geraldine Johnson
Mary Jordan
Randall Jordan
Anthony Kalvans
Judith Kang
David Kirk
Edie Knight
Trevor Kraft
Charles E. Kennedy
Brandon Kolaczyk
Michelle Kolaczyk
Brent Lintner
Paul Lord
Susan Lord
Andrea Lueker
Robert R. Maharry
Brett Malone
Jimmy Mase
Jami Meinhold
Bret Miller
Henry Shane Miller
Nicole Miller
Jessie Miller
Sandra Miller
David L Montenegro
Steve Moore
Laura Mordaunt
Randall Morton
Anthony Nagey
James Nailen
Joseph Nungary
Dwayne Oberhoff
Jeremiah O'Brien
Trudy O'Brien
Janice Peters
Archie Ponds
Butch Powers
Tracy Powers
Francisco Ramirez
Anita Recio
Steve Rebuck
Mary Ann Reiss
Rick Rettler
Fred Rohrs

Gerald Sato
Richard Scangarello
Rhonda Scangarello
Diane S. Schoditsch
Heather Sears
Andrea Seastrand
Tiffani Seitz
Alan Serio
Jennider Skarda
Nicolas Steers
Phyllis Stout
Sandra Tannler
Lydia Thompson
Norman Thompson
Joanne Tobias
Linda Trahey
Ed Veek
Jeannette E. Watson
Angela Woeste
Evan Woeste
Mockler Wolfgang
Debi Wood
Johnny Wyatt
Tanya Wyatt