Chumash Heritage National Marine Sanctuary

• Nominator Name(s) and Affiliation(s)

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• Nomination Point of Contact

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Section II – Introduction



The waters of the proposed Chumash Heritage National Marine Sanctuary (CHNMS) lie between the Channel Island National Marine Sanctuary and the Monterey Bay National Marine Sanctuary. The unique coastline and ocean waters are the most beautiful in the world to the First Peoples and the communities that live along this ecologically rich, biologically diverse healthy coastline, and to many that come from all over the world to visit our coast.

These waters are critical to the maintenance of ecologically and commercially important species, along with critical habitat that connects with bio-geographic assemblages that enhance the ecological significance of these coastal waters.

Commercial and recreational fishing depend on the ecological balance and protection of the waters for future generations.

Protecting our coastal resources for all communities that live here, learning and understanding the connectivity of all things along our coast will make the educational and learning possibilities very special for all of our coastal communities and will enrich the communities' understanding of how we can assist these ocean waters in the nurturing of her health and balance, in a good way, to honor the provider of great magical wonder and *Thrivability*.

"Thrivability" is a balanced, complete, connected, all-systems-are-go understanding, which is currently being nurtured by indigenous communities worldwide. Indigenous Thrivability is an inspirational model of development to work on behalf of all living and non-living beings. Connected-Thrivability is a positive and inclusive vision that steps away from messages of complacency and sacrifice, and into a mentality that empowers people to take on the deepest societal problems with courage and enthusiasm. It is founded upon the premise that thriving is not something that just happens to inspired individuals, but it is something that can be actively designed into organizations, communities and cultures, actively creating and strengthening conditions that provide the greatest opportunity for systems to evolve and thrive.

Looking at it as a question, if sustainability is centered around asking the question, 'How do we fix the mess we've made?' then thrivability asks, 'What kind of world do we want to live in? And if sustainability is indeed about aspiring to get us back to zero, thrivability asks, 'What's on the other side of zero?' The understanding speaks beyond bottom lines, to complete ecosystems, to the environment, and to the health of our whole planet. It speaks about actively creating a future we want rather than responding to one that frightens us. And because of its emergent nature, thrivability cannot be approached as a destination, but rather as a dynamic process of adaptation, learning and action. Core components of it encompass fields like appreciative enquiry, bio-mimicry, applied improvisation, traditional ecological knowledge, developmental psychology, and future economics. Thrivability builds on itself. It is a cycle of actions that reinvest energy for future use and stretch resources further. It transcends sustainability by creating an upward spiral of greater possibilities and increasing energy.

Each cycle builds the foundation for new things to be accomplished. Thrivability emerges from the persistent intention to create more value than one consumes. When practiced over time this builds a world of ever increasing possibilities. The First Peoples of this land have teamed with local communities and organizations to express our deepest passions and caring for our wonder of the world: the magnificent San Luis Obispo County and Santa Barbara County coastal waters. In preserving them, we together want to expand our daily incredible vision of great beauty and wonder to the world. Our coastal waters have unfound beauty and unexplored potentials.

We the Peoples of the San Luis Obispo and Santa Barbara Counties' communities want our beautiful ocean waters to be designated to the highest levels of preservation and protection for all future generations to come.

The Chumash Peoples have awakened to the smells, sounds and the view of this sacred western horizon for over 15,000 years. This great Pacific Ocean is the birth of life for the Chumash Peoples. The gentle breeze is moving and awakening all that live in or survive on these sacred waters.

Dolphins and whales feed throughout the area and in large numbers during the autumn at the Santa Lucia Bank, part of the oceanographic features forming the only year-round Pacific Coast upwelling. White sea bass eat massive schools of squid at the Santa Maria River outlet, and the giant elephant seals bask on the northern beaches. Birds and fish feast on larger bait balls of sardines and mackerel, while peregrine falcons nest on sacred Lisamu (Morro Rock.) Migrating birds from all over the world rest in our waters, incredible kelp forests teaming with life line the spectacular coastline, and nudibranchia sway in the tidal flow. The great white shark and killer whales are on the hunt, salmon and albacore are swimming deep, and the incredible view is the same as it has been since the First Peoples of the Chumash looked upon its sacred waters over 15,000 years ago.

These ocean waters protect the ancient Chumash villages that lay under the ocean on the submerged lands of San Luis Obispo and Santa Barbara Counties. These waters have swelled with the rise and fall of the tides from the last ice age, the age of the mastodon, mammoth, saber tooth tiger, giant sloths, gargantuan grizzly bears, the mega-animal time, the time of the First Peoples.

The Chumash were living in villages some 3 to 6 miles to the west of current tidal lines and on Point Conception, and even further west, until the ocean submerged the homes of our ancestors. Protecting these submerged ancient Chumash villages from all future encroachment will ensure the peaceful resting places of the First Peoples, our Chumash ancestors.

Designation of the proposed California Central Coast Chumash Heritage National Marine Sanctuary will ensure the continued protection of one of the most important, culturally and biologically diverse, unique and ecologically rich coastlines in the world.

It is our intention that the designation document when drafted shall have no impact on treaty fishing rights. These rights shall not be modified or altered in any way by the designation of the Sanctuary. The designation document should not contain Sanctuary authorization to regulate fishing.

The boundaries of the sanctuary would not include harbors. The boundaries would end at the harbor mouth. In harbor dredging operations, we envision the Sanctuary working with harbors to identify locations where dredge spoils will be discharged offshore, or nearshore if viable for beach nourishment. Previously approved dredge disposal sites would be exempt from sanctuary regulations. If a harbor desires new offshore sites in the future, this would be included as an action plan in Sanctuary management plan updates to establish location, volumes, etc. Sanctuary regulation on seabed disturbance would also include an exemption for any harbor maintenance or repair activities.

• **Narrative Description** – a brief overview of the nomination

We have gathered an extensive biogeographical database on the nomination site that includes details of significant characteristics, including currents, upwellings, species density, diversity and distributions maps and important cultural and maritime heritage features. These are available as a resource for consideration but are too extensive for inclusion in this nomination. Please see http://chumashsanctuary.com/area/

The Sanctuary would protect submerged Chumash archaeological sites ranging from villages to possible solstice alignments. The archaeological record suggests occupation of this area for over 15,000 years. At its southern boundary, the Sanctuary would provide for the protection and research of the permanent upwelling of nutrients between Point Arguello and Point Sal that flows through the mile-deep submarine Arguello Canyon, guided by the Santa Lucia Bank 40 miles west of Point Sal and guided from the south by the Channel Islands. This permanent upwelling is considered to be the most significant nutrient center for sea life in the northern Pacific Basin. The Monterey Bay National Marine Sanctuary and the Channel Islands National Marine Sanctuary are both dependent on nutrient sources in the proposed Sanctuary.

• Goals Description

The Chumash Heritage National Marine Sanctuary will protect the historical and cultural heritage of the Chumash people from any future proposed oil and gas drilling or exploration, seismic surveys, and other disturbances of the sea floor and habitat. The Sanctuary would promote, support and coordinate scientific research and monitoring of coastal resources, and would enhance public awareness, understanding, appreciation and use of the marine environment within the geographic area, including the rocky intertidal fish community of the Central Coast of California, one of the most diverse and abundant in the world. The sanctuary will protect an abundantly rich and diverse marine ecosystem that is a nursery and home for many fish and marine mammal species, and a migration lane for seven species of whales and six types of dolphins and porpoises, a diverse fishery, and many more seals, otters, and marine wildlife.

• Location Description

The proposed Chumash Heritage National Marine Sanctuary is located along the pristine south Central California coastline, from Gaviota Creek in Santa Barbara to Santa Rosa Creek in Cambria. The western boundary of the CHNMS would be west of the submerged Santa Lucia Bank along the Santa Lucia Escarpment. The eastern boundary would be the mean high tide line. These pristine coastal waters are between the Channel Islands National Marine Sanctuary (CINMS) and the Monterey Bay National Marine Sanctuary (MBNMS). There are seven nationally and internationally important core areas within this proposed sanctuary that were originally identified in San Luis Obispo County's 1990 proposal to become the Central Coast National Marine Sanctuary. That proposal died when Congress did not take action.

The proposed sanctuary area encompasses submerged Sacred Chumash sites, historic major shipwrecks, a Permanent Upwelling, Arguello Canyon, seasonal upwellings, the Santa Lucia Bank upthrust block, the Rodriguez Seamount, the Kashtayit State Marine Conservation Area, several California Department of Fish and Wildlife Marine Protected Areas, southernmost sea otter cluster, marine mammals and haulouts, wetlands, rookeries, kelp forests, and other significant nationally and internationally important marine life and marine ecosystems. The unique oceanographic combination of the mile deep canyon, through which California's and also the West Coast's only persistent upwelling flows, the Santa Lucia Bank upthrust block, and the Rodriguez Seamount create the ideal conditions for an internationally and nationally significant diverse density of marine life attracting whales and birds throughout the Pacific Ocean to feed at the Santa Lucia Bank.

Along the coast of the proposed marine sanctuary are California's largest coastal dunes complex, Gaviota State Park, Jalama Beach County Park, Pismo State Beach, Point Sal State Beach, Oceano Dunes State Beach, Morro Bay National Estuary, Morro Rock State Landmark and Bird Sanctuary, the historic Point San Luis lighthouse, Cayucos State Beach. The California Coastal National Monument includes rocks, islands, exposed reefs, and pinnacles along the coastline.

Section III – Criteria Information

Provide detailed information on each of the criteria below that are relevant to your nomination.

Criteria 1

The area's natural resources and ecological qualities are of special significance and contribute to: biological productivity or diversity; maintenance or enhancement of ecosystem structure and function; maintenance of ecologically or commercially important species or species assemblages; maintenance or enhancement of critical habitat, representative biogeographic assemblages, or both; or maintenance or enhancement of connectivity to other ecologically significant resources.

Seven Core Areas are proposed. Detailed maps of the core areas can be found on the Chumash Heritage National Marine Sanctuary website, http://chumashsanctuary.com/area/

Core Area One is the nearshore area from mean high tide line out 3 to 13 miles offshore of this proposed sanctuary coastline. This area contains many of the submerged Cultural Chumash Sacred Sites.

Core Area Two is located off the California Central Coast between the Channel Islands and Monterey Bay National Marine Sanctuaries. Within its boundaries are an upthrust block, a mile deep sea canyon, and a seamount. The Santa Lucia Bank upthrust block rises to within 400 meters of the ocean surface 30 to 40 miles offshore from the north face of the Arguello Canyon to offshore Morro Bay. This are a lies within the Oceanographic and Meteorological transition zone of the Oregonian and Californian Providences at the complex meeting place of south and north moving major warm and cold ocean currents. The complex topography is the result of the meeting place of two major tectonic plates and two micro plates 'riding' the Pacific Plate. The topography within the proposed boundary — the Rodriquez Seamount, the Arguello Canyon, Santa Lucia Bank and the Santa Lucia Escarpment —constitutes a meeting place of these major ocean currents that guides and funnels the West Coast's only persistent upwelling, rising between Point Arguello and Point Sal, feeding whales and birds throughout the Pacific Ocean.



Core Area Three is from Gaviota Creek, south of Point Conception, to Purisima Point. This area contains thriving kelp forests, wetlands, Kashtayit State Marine Conservation Area, two state Marine Protection Areas (MPA), historic major shipwrecks, and onshore Gaviota State Park and Jalama Beach County Park. The richness of the marine habitat is dependent upon the adjacent permanent upwelling waters.

Core Area Four is from Point Sal to Arroyo Grande Creek. This area contains kelp forests, wetlands, an onshore National Natural Landmark (the largest California Coastal Dunes Complex), Point Sal State Beach, Oceano Dunes State Beach, and Pismo State Beach.

Core Area Five, a rocky intertidal area of northern San Luis Bay, begins at the northernmost end of the 26-mile stretch of sandy beach called Pismo Beach. From this rocky cliff area along the coastline to the southern end of Avila Beach, another high rocky cliff, the boundary arcs offshore to the 200 meter bathymetric line back to the Pismo Beach rocky cliffs in order to protect prominent offshore rock habitat in the San Luis Bay. Along this stretch of coast is a major complex of kelp forests; none are found southward until Point Sal. The coastline varies from rocky cliffs with no beaches to cliffs with some beach. Despite the beach areas, the dominant rocky hard bottom offshore provides appropriate habitat for the kelp forest and its lush populations of plant and animal life. The area is host to the last significant southernmost population of southern sea otters in the Southern Sea Otters Range.

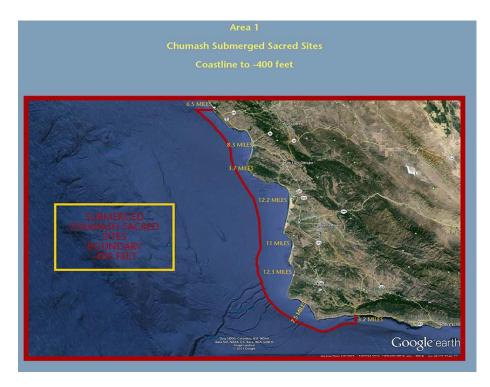
Core Area Six includes the shoreline of the Pecho Coast, located between Point San Luis and the Morro Bay Sandspit, the Morro Bay Sandspit to the north flank of Morro Rock, and the nearshore waters out to the 200-meter bathymetric line. The Pecho Coast marine environment consists of a 13-mile stretch of intertidal rocky reef beginning at Point San Luis north to Hazard Canyon. The shoreline is characterized by sheer, wave-eroded cliffs, jutting headlands, and massive offshore submerged and exposed rocks. Above shoreline the narrow coastal bench is flanked by hills. The tidal zone is generally narrow and may terminate abruptly where protection from wave shock is minimal and deposition is reduced or absent. These topographical features form a highly irregular coastline. The coast provides many different exposed and protected habitats that extend or control the abundance and composition of marine plants and animals. This area contains two state MPAs and is adjacent to the Morro Bay National Estuary.

Core Area Seven is from Cayucos Creek to Santa Rosa Creek. At its northern end, the Sanctuary would protect the North Estero Bay Intertidal Zone, extending from the Chumash village site of Cayucos and other large sites found in the area to a mile north of Pt. Estero. Comprised of rocky intertidal zones associated with dense kelp forests and other algae populations, the area supports a wide diversity of life. One of the largest southern sea otter population clusters resides within this zone. Offshore rocks provide rookeries and roosting sites for birds and haulouts for pinnipeds. 500 to 600 harbor seals are found here. Whales other than gray whales occasionally visit within this zone. Gray whales stack at Point Estero during migrations. Onshore are found Cayucos State Beach, White Rock, and Cambria MPAs.

Criteria 2

The area contains submerged maritime heritage resources of special historical, cultural, or archaeological significance, that: individually or collectively are consistent with the criteria of eligibility for listing on the National Register of Historic Places; have met or which would meet the criteria for designation as a National Historic Landmark; or have special or sacred meaning to the indigenous people of the region or nation.

Chumash records suggest occupation of the central coast area for more than 15,000 years, with an older recorded date at Point Conception, an extremely important Chumash Sacred Place known to Native Americans as the Western Gate. Other sites adjacent to or extending into submerged land include: Jalama: two 10,000 year-old sites



within Vandenberg AFB; sites at Point Sal; four major Chumash Sacred sites onshore San Luis Bay of which three are known to have been continuously occupied for at least 9,000 years: the site for which the City of Pismo Beach is named, the site where the Chumash people return to renew the Traditional Ritual Ceremony Cycle, the old Chumash Capital in the area of Avila Beach, now partially covered by sea level rise; the Chumash Sacred site at Diablo Cove along the coastline of the Pecho Coast dated over 9,000 years; the Chumash Village Sacred site in Los Osos; hundreds of Chumash Sacred sites ringing Morro Bay; the Chumash village Sacred site of Cayucos (continuously occupied for 8,000 years); other large sites found in the area to a mile north of Pt. Estero; and two Chumash village Sacred sites in Cambria continuously occupied for 10,000 years.

Core Area 5 contains four major onshore Chumash sites -- three known to have been continuously occupied for 9,000 years. One is the site for which the city of Pismo Beach was named, one is a site to which the Chumash have returned to renew the traditional ritual ceremony cycle, and one is the old Chumash capital in the area of Avila Beach, now partially covered by sea level rise.

Core Area 6 contains one of the oldest known Chumash sites on the coastline at Diablo Cove, a continuously occupied 9,000-year-old Chumash village site, the Chumash village site in Los Osos, hundreds of Chumash sites ringing Morro Bay, and the sacred site and Bird Refuge of Morro Rock. Chumash coastal and submerged sacred site area continues northward to Ragged Point in the Monterey Bay National Marine Sanctuary.

Several significant Chumash village and foraging sites are found near Point Sal. A variety of sites are found within the Nipomo Dunes and adjacent to its wetlands. Extensive shell mounds from thousands of years of clamming have been documented. Other sites line the old Pleistocenera dunes of Nipomo and Arroyo Grande above what was once a large estuary formed by Arroyo Grande Creek and the Price Canyon drainage. Several other sites surround the old estuary on its northern embankment. An unknown number of submerged sites are off Pismo Beach, most probably located along older drainage systems dating back nearly 20,000 years.

The old Chumash capital of the area in Avila Beach has been partially covered by rises in sea level. Other archaeological Chumash sites have been covered by ocean rise. Significant Chumash solstice alignments arrive from the interior, passing through present coastal sites that 9,000 years ago were miles from the coast. Presently operating alignments pass along coastal benches and pass offshore to now submerged rock outcrops, similar to those on the Carrizo Plain, and pass beyond over areas were once dry land.

Two miles north of Point Arguello at Point Honda, seven U.S. Navy destroyers sank in 1923, the Navy's worst peacetime loss. Point Arguello has been called the "Graveyard of the Pacific," and is home to over fifty known shipwrecks. Probably the most famous was the wreck of the *Yankee Blade* on the 1st of October 1854. 415 people perished when the steamship hit the rocks 200 to 300 yards offshore. She carried a fortune in gold bullion, since recovered. The SS Yankee Blade Shipwreck Historic site is listed on the National Register of Historic Places.

SAN LUIS OBISPO COUNTY SHIPWRECK LIST

SHIP	SUNK DATE	NOTES	COORDINATES
SS Montebello	23 December 1941	An oil tanker that was	35 35 N 121 16 W
		torpedoed by Japanese	
		submarine I-21 off	
		Cambria, California.	

SANTA BARBARA COUNTY SHIPWRECK LIST

SHIP	SUNK DATE	NOTES	COORDINATES
Aggie	4 May 1915	A barquentine that ran	
		aground at Santa Rosa	
		Island, California.	
USS Chauncey (DD-	8 September 1923	One of seven United	34.602067
296)		States Navy ships that	-120.644109
		ran aground off	
		Lompoc, California in	Honda Point Disaster
		an incident known as	
		the "Honda Point	
		Disaster".	
Chickasaw	7 February 1962	A cargo ship that ran	
		aground on Santa	
		Rosa Island,	
		California.	
Crown of England	7 November 1894	A steamship that ran	
		aground off Santa	
		Rosa Island,	
		California	
SS Cuba (1920)	7 September 1923	A German steamboat	
		that was seized by the	
		United States in 1917,	
		and eventually ran	
		aground off San	
		Miguel Island, on the	
		same day as the	
		"Honda Point	
TIGG D 1.1	0.0 . 1 1000	Disaster"	24 6020 67
USS Delphy	8 September 1923	One of seven United	34.602067
(DD-261)		States Navy ships that	-120.644109
		ran aground off	H 1 D ' (D')
		Lompoc, California in	Honda Point Disaster
		an incident known as	
		the "Honda Point	
LICC Enller	9 Cantamb - : 1002	Disaster".	24 602067
USS Fuller	8 September 1923	One of seven United	34.602067
(DD-297)		States Navy ships that	-120.644109
		ran aground off	

		Lompoc, California in an incident known as the "Honda Point Disaster".	Honda Point Disaster
Goldenhorn	12 September 1892	A barque that ran aground off Santa Rosa Island, California	
Humble SM-1	25 November 1961	A drillship that foundered off Santa Barbara, California	
USS McCulloch (1897)	13 June 1917	A cutter boat that collided with the "Governor" off Point Conception, California	
USS Nicholas (DD-311)	8 September 1923	One of seven United States Navy ships that ran aground off Lompoc, California in an incident known as the "Honda Point Disaster".	34.602067 -120.644109 Honda Point Disaster
Sibyl Marston (ship)	12 January 1909	A schooner that ran aground off Lompoc, California	34.653474 -120.61747
USS S. P. Lee (DD-310)	8 September 1923	One of seven United States Navy ships that ran aground off Lompoc, California in an incident known as the "Honda Point Disaster".	34.602067 -120.644109 Honda Point Disaster
USS Woodbury (DD-309)	8 September 1923	One of seven United States Navy ships that ran aground off Lompoc, California in an incident known as the "Honda Point Disaster".	34.602067 -120.644109 Honda Point Disaster
Yankee Blade	1 October 1854	A steamboat that ran aground at Point Arguello Light. Point Arguello, California	34 34 37 N 120 38 50 W
USS Young (DD-312)	8 September 1923	One of seven United States Navy ships that ran aground off Lompoc, California.	34.602067 -120.644109 Honda Point Disaster

Criteria 3

The area supports present and potential economic uses, such as: tourism; commercial and recreational fishing; subsistence and traditional uses; diving; and other recreational uses that depend on conservation and management of the area's resources.

In 2000, the proposed CHNMS region accounted for 3% of California's total employment. Ocean Sector Employment in the region, including commercial and recreational fishing, was 7.3% of California's ocean sector employment. Per the National Ocean Economics Program, in San Luis Obispo County from 2005 to 2011, the value of ocean tourism and recreation grew from \$227 million to \$252 million. During the same period, the value of In San Luis Obispo County's ocean living resources grew from \$536,000 to \$2.6 million. In Santa Barbara County from 2005-2011, the value of ocean tourism and recreation grew from \$512 million to \$564 million. A recent study estimated that designation of a national marine sanctuary on California's Central Coast would conservatively result in additional revenues of \$18,245,014 and 547 new jobs.¹

Criteria 4

The publicly-derived benefits of the area, such as aesthetic value, public recreation, and access to places depend on conservation and management of the area's resources.

The sanctuary as proposed would fill an existing gap among the four national marine sanctuaries off the California coast, and thereby make it possible to extend contiguous conservation and management benefits across 400 miles of coastal waters. The benefits derived from the proposed area begin with the aesthetic appreciation of the cultural landscape of the Pacific Ocean meeting rolling hills, rivers, estuaries, bays, and huge sand dunes. Numerous ocean recreation areas and beach access locations attract surfers, kayakers, fishermen, boaters, campers and beachcombers alike who consider these areas to be special places that contribute to their happiness and quality of life.

This area has been a Chumash indigenous cultural landscape for thousands of years. Brenda Barrett of the National Park Service Indigenous Cultural Landscape Team, writes in the *Living Landscape Observer* that defining the Indigenous Cultural Landscape "can apply to coastal and maritime landscapes that merge many natural and cultural values and have been places of settlement for thousands of years." This concept marks a reemergence of a traditional aesthetic value. The persistence of the cultural landscape within Chumash oral traditions contains knowledge about sacred sites covered by ocean rise thousands of years ago.

Conservation and management of this area's resources are crucial to prevent negative impacts to the ocean recreation experience. The California Coastal Act, as administered by the California Coastal Commission within state coastal waters, has the largest impact in the management of the area's resources to ensure aesthetic value and access for recreation. The Coastal Act addresses issues such as shoreline public access and recreation, lower cost visitor accommodations,

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¹ "The Potential Economic Impacts of the Proposed Central Coast National Marine Sanctuary," J. Scorse Ph.D.,, J. Kildow, Ph.D. September 2014. http://santalucia.sierraclub.org/Econ%20Report%20for%20Sierra%20Club%209-25-14.pdf

terrestrial and marine habitat protection, visual resources, commercial fisheries, water quality, offshore oil and gas development, etc., constituting the statutory standards applied to planning and regulatory decisions made by the Commission and by local governments, pursuant to the Coastal Act. A sanctuary is envisioned as working in partnership with the Commission to implement its resource protection provisions in state and federal waters in a manner complementary to those that apply to the region's coastal zone.

Section IV – Consideration Information

Consideration 1

The area provides or enhances opportunities for research in marine science, including marine archaeology.

There is a strong marine research community in San Luis Obispo County. California Polytechnic State University, San Luis Obispo, which has majors in Archaeology, Geology, Environmental Science, Biological Science, Fisheries, and Marine Sciences. The university operates the Center for Coastal Marine Sciences (CCMS), with research labs, faculty and student offices and a large warehouse for storing and testing oceanographic instrumentation. These facilities are augmented by lab and classroom space at the 1km long Cal Poly pier in Avila Beach, providing opportunities for students to be involved in research activities. The university's internship programs have staffed conservation and environmental work programs with the National Geographic Society, National Wildlife Foundation, San Luis Obispo County Archaeological Society Research and Collections Facility, and Student Conservation Association. There are existing external internship programs with an extensive list of partners that provide collaborative research support in areas such as cultural resource data collection through Applied Earthworks run by Principle Archaeologist Barry Price; cultural resource data collection, management and acquisition with Cal Trans; and archaeology through the California State Parks. The Marine Science Institute at the University of California Santa Barbara has an extensive undergraduate and graduate program, highly integrative with a multidisciplinary approach combining marine chemistry; marine anthropology and policy; biological oceanography and marine biology; marine geology, geophysics and paleoceanograpy; ocean engineering; ocean physics, optics and remote sensing; and maritime anthropology and policy. The Allan Hancock and Cuesta Community Colleges have Oceanography programs, and the Santa Barbara City College has marine biology and marine technology programs.

Consideration 2

The area provides or enhances opportunities for education, including the understanding and appreciation of the marine and Great Lakes environments.

The Marine Science Institute at UCSB collaborates with Channel Islands National Marine Sanctuary in operating the Outreach Center for teaching Ocean Science. Along with the Santa Barbara Museum of Natural History; the Santa Barbara Maritime Museum and the Sea Life Center, the OCTOS center is a prime example of the kinds of programs that are available to partner with to provide education and outreach for the Chumash Sanctuary as an adjacent link and bridge in connecting the national sanctuary system. Among local active NGOs are the San Luis Obispo and Santa Barbara chapter of the Surfrider Foundation working to clean up coastal waters, Central Coast Salmon Enhancement working in stream cleanup, The Marine Mammal Center helping injured and sick ocean mammals, Pacific Wildlife Care center for all injured

wildlife, The Sierra Club working on many environmental issues, SLO Science and Ecosystem Alliance studying and supporting marine resources, Morro Bay National Estuary Program, Guadalupe-Nipomo Dunes Center, The Nature Conservancy completing its work with Morro Bay fishermen, Citizens Opposing Acoustic Seismic Testing, The Otter Project, Friends of the Otter, Friend of the Elephant Seal, Avila Beach Marine Institute (Avila CC Aquarium), Morro Bay Natural History Museum, Cambria Land Trust, the Northern Chumash Tribal Council and the California Dept. of Fish and Wildlife's Marine Protected Area Collaborative Implementation Project (MPA CIP) for the Central Coast MPA Network. Many of these groups maintain outreach programs to schools and the community. These are educating with beach signs and websites and actively engaging in ocean protection efforts.

Consideration 3

Adverse impacts from current or future uses and activities threaten the area's significance, values, qualities, and resources.

Recent threats to Central Coastal waters have included attempted ocean disposal of Central Valley agriculture waste, air gun seismic blasting in near shore areas and proposals for slant drilling from onshore facilities into the marine environment. The wastewater treatment plant at the California Men's Colony has a history of overflow discharges into Chorro Creek that flow into the Morro Bay National Estuary. Discharges from Atascadero State Hospital flow into the Salinas River. Several outfalls discharge sewage in the ocean. The Diablo Canyon Nuclear power plant uses once-through cooling technology that kills billions of organisms and discharges unnaturally warm water.

Several wave power projects off the Central Coast are in the preliminary stages. In December 2013, Florida-based Archon Energy announced its intention in to build wave energy parks off of Morro Bay and Purisma Point and has filed permit requests for both with the Federal Energy Regulatory Commission (FERC). Cal Poly is studying the potential for National Wave Energy Test Center off the coast. Starwood Energy is working with Dynegy, owner of the decommissioned Morro Bay power plant, on re-purposing the coastal natural gas power plant for some other form of energy generation.

Consideration 4

A national marine sanctuary would provide unique conservation and management value for this area or adjacent areas.

The sanctuary's proscriptions against dumping, drilling, disturbance of the seabed, and runoff will be uniquely protective of this area's many Chumash submerged sites, the only persistent upwelling in the eastern Pacific, significant kelp beds, high coastal dunes, three estuaries, deep water communities of marine life, whale, porpoise, and dolphin gathering areas, rocky intertidal regions, whale migration lanes, many migratory birds, and coastal views from many national and state parks.

Consideration 5

The existing regulatory and management authorities for the area could be supplemented or complemented to meet the conservation and management goals for the area.

With 2 harbors, 4 Marine Protected Areas, 3 estuaries, 2 Harbor Patrol offices and a U.S. Coast Guard facility, a sanctuary will enhance the quality of their work and complement efforts to meet their management goals. A sanctuary will strengthen the MPA network as one of the State and Federal agencies collaborating on MLPA implementation. A sanctuary will also supplement the conservation goals of Harmony Headlands State Park, Morro Strand State Beach, Morro Bay State Park, Elfin Forest Natural Preserve, Montaña de Oro State Park, Pismo State Beach, Oceano Dunes Vehicular Recreation Area, Pismo Dunes Natural Preserve and Gaviota State Park. Filling the gap between the two national marine sanctuaries to the north and south would promote a unified approach to managing protected areas.

Consideration 6

There are commitments or possible commitments for partnerships opportunities such as cost sharing, office space, exhibit space, vessel time, or other collaborations to aid conservation or management programs for the area.

Opportunities exist to partner with the Cal Poly's SLO SEA vessel research program and Center for Coastal Marine Sciences (CCMS) and the CA Dept. of Fish and Wildlife MPA Collaborative Implementation Project, Terra Marine Research and Education, the Marine Mammal Center and Coastwalk, and to partner with the Morro Bay National Estuary Program and Avila Central Coast Aquarium to share office and exhibit space in their proposed redesign of the Morro Bay Aquarium, or with the County of San Luis Obispo and Oceano Community Services District in a repurposing of the Oceano Airport facilities. The Cal Poly Pier can be shared with a variety of reseachers.

Consideration 7

There is community-based support for the nomination expressed by a broad range of interests.

Supporters include:

Organizations

Big Sur Advocates for a Green Environment

CA Central Coast Marine Sanctuary Alliance

Center for Biological Diversity

Clean Oceans Competition

COAST (Citizens Opposed to Acoustic Seismic Testing)

Dolphinmotion (Dutch Marine Conservation Group)

Earth Law Center-Linda Sheehan

Friends of the Earth U.K. Director UKWIN/TATWBN & Delegate

OSPAR/OCEANS/Black Fish

Friends of the Elephant Seal

Friends of the Sea Otter, Jim Curland, Advocacy Program Director

Grandmothers for Peace San Luis Obispo County Chapter

Greenspace-The Cambria Land Trust

Hands Across the Waters

Healing Ourselves and Mother Earth

Inter-Nation Cultural Foundation (INCF)

KayakMorroBay

The Modoc Nation-Government for the Modoc People of

Southern Oregon and Northern California

Nevada Nuclear Waste Task Force

No Ocean Outfall

Ocean Defenders Alliance (ODA)

San Luis Obispo Chapter of Surfrider Foundation

Sierra Club

The California Regional Environmental Education Community Network

Safe Beach Now

Save Our Seas-Hawaii

Terra Foundation

Businesses

A Cut Above Beauty Salon Native Herb & Honey Co.

Ambiance New Frontiers Natural Marketplace

Archaeological Assessment and Management Nordic Mart Inc

Art Central Ocean Friendly Gardens

Baby Blue, Los Angeles

Rest Western Trade Winds Morro Bay

Ocean Grill Avila Beach
One Rainforest Beacon

Best Western Trade Winds, Morro Bay
Boo Boo Records
One Rainforest Beacon
Pacific Naturopath Medical Center

Peoples Choice Services

Branch Mill Organic Farm

Control Control Residue Professional Phoenix Books

Central Coast Kayaks/Pacific Outfitters
Central Coast Pathology Consultants, SLO
PhotoMorroBay

Curry Fine Arts

Pismo Collection

Doctor's Hearing Aids

Problem Solved, Cambria

Rootamental

Dr. Cain's Comics
ENT Specialists

Rootamental
Seaside Café & Bakery

Gentle Giant Chainmaille Shell Beach Liquor

Gino's Pizza Shell Beach Surf Shop
Golden Donut Steynberg Gallery

Grand Central Music The Big Red House, Cambria

Harper Jo Clothing
Healing Hands of Happy Hill
The Drum Circuit
The Fitting Image

Hidden Coast Outdoors

The Golden Paw

Honeymoon Café, Shell Beach

The Moose Deli & Brew

Hoola Hut Restaurant, Avila Beach

The Photo Shop

Introbalance Yoga The Sky's The Limit, Pismo Beach

La Isla Fashion Group, SLO

Law Offices of Tarren Collins

Tigerlily Salon

Trophy Hunters

Lightning Joe's Guitar Heaven

Verena's Go Gourmet

Mission Kitchens Young Digital Marketing, SLO

Individuals

Dana Abbott, San Jose
Nancy Albee, Cayucos
Janette Acosta,
Evan Albright, SL, Cambria

Rusty Adams, Arroyo Grande Ameralieta, SLO

Bev Ano, Atascadero Elizabeth Apfelberg Jesse Arnold, Cambria John Ashbaugh, SLO

Stefan Ayres

Anthony Balin, SLO Dennis Balsalmo Ellie Barnes Margaret Bekkes Sarah Bellum, Pismo

Jay Bonestell Vicki Bookless Steven Boothe Ellie Brever Jim Brook

Elizabeth Brousse, Templeton Marty Brown, Atascadero

Jamie Budd MaryJo Burton Anet Carlin Lucas Carlow Victoria Carranza Milton Carrigan Ignacio Chapola

Andrew Christie, Cambria

Janet Clarke, SLO

Harvey and Kathy Cohon, SLO

Charity Collina

Fred Collins, Los Osos

Mitchell Cooke

Leslie Craig, Morro Bay Nancy Craig, Morro Bay

Shoosh Crotzer Sarah Damron

Thom, Diane Danfield Mandy Davis, Morro Bay

Deb Roshacfor

Jill Denton, Los Osos Frank dePasquale

Neil Dilworth, Shell Beach Lindi Doud, Los Osos Drew Unetic, SLO

Ray Duncan Patti Duron Gregory Ellis Maria V. Eyhles Giselle Fauquet Wendy Forest James Forester Brittany Fowler Barry Franz

Polly and Phil Gammons, SLO Carol Georgi, Shell Beach David Georgi, Shell Beach

Dana Gibson

Julie Gibson, Gerard Wells Watson Gooch, Cayucos Monique Graneda, SLO Judith Resnick, Morro Bay Nancy Graves, Grover Eric Greening, Templeton

Joseph Geever

Henrietta Groot, Los Osos Matt Guerrero, Oceano

Jamphel Gyatso Riley Haas

Todd Hallenbeck

Julie Harper, Atascadero Rick Hawley, Cambria

Lucy Haworth

Roger Heathcoat, Nipomo

Lila Henry Don, Joan Hertel Sandra Hinder Christine Hirsh Russell Hodin

William Hopper, Santa Ynez Laurence Houlgate, SLO Heather Howell, Morro Bay

Joseph Hudson

Stacy Hunt, Los Osos

Luhui Isha

Elizabeth Johnson Anna Johnson Garry Johnson Kenneth Johnson Marcia Johnson

Lionel Johnston, Morro Bay

Jennifer Jozwiak

Erick Just, Pismo Beach

Scott Kam, SLO Marcia Kane

Donna and Larry Kaplan Karl Kempton, Oceano Aaron Kirby, Arroyo Grande Thomas and Sharon Kilby, SLO

Julie Krejsa

Richard J. Krejsa, SLO

Paige Kromhout Catherine Krupp

Nell Langford, Oceano

Shannon Latson Karen Leonard

Carroll Leslie, Los Osos Alfred Levine, Florida David Levy, London, UK

Sherry Lewis

Terry Lilley, Hawaii Robert Lindquist, Avila

B. Auto Litano Katie Lores Lloyd Madansky

Ruth Madocks, Arroyo Grande

Maheyla

Simone Malboeuf, Los Osos

Mary Malotte, SLO Pat Mangione, Morro Bay Keiko Marcus, Arroyo Grande

Trevor Marum

Steven Matejcek, SLO Lucia Mauro, SLO Jennie McCarney Jack McCurdy Patrick McGibney Chele McKee

Marie McRee, CC Village Ctr.

Kenneth Melville, SLO Steve Messina, Morro Bay Janet Miggins, Morro Bay Edward Miggins, Morro Bay

Edel Mitchell Rob Mohle, Avila Justin Montes, SLO Rusty Moore, Grover Beach

Greg Moore

John Mostachetti, SLO

Kathryn Myer

Denny & Kitty Mynatt Carolyn Nevling, SLO Heather Neyes, SLO

Robert Nieto

Montgomery Norton

Sky Nute

Michael O'Connell Jay Okada, Los Osos

Ivan Brown Otter, Cayucos

Laura Owens

Allessandro Pasounri Patrick Patten, Cayucos

Lisha Perini

Jeff Pienack, Oceano Joanie Piner, Los Osos

Gil & Sandy Pitt, Arroyo Grander

Robert Platkin, San Mateo Paul Lobo Portuges, Los Osos Reza Pouraghabagher, Los Osos

Barry Price, Shell Beach

Ellen Radon Nikki Reich John Reid

Pat Renshaw, Los Osos

Spenser Riffle, Arroyo Grande

Breanna Rosas Sister Rosemarie

Ron Ross

Richard Sadowski, Morro Bay

Gar & Elizabeth Salzgeber, Morro Bay

Beedie Savage, Los Osos Kevin Patrick Sullivan, SLO Ann Sawyer, Arroyo Grande

Kristy Scherner, SLO Kelli Schonher, SLO Linda Seeley, SLO Peggy Sharp, SLO Linda Sheehan, Fremont

Leland Sidwell Debra Sievers

Gregory K. Siuss, SLO Holly Sletteland, Cayucos

Amanda Smith Spring Smith

Brad Snook, Shell Beach

Liz Stanislaw

Marilee Mahoney-Stato, A.G. Lani Steele, Dr., Los Osos

Kristofer Stehl Tawny Sterius, SLO Jane Swanson, SLO Carol-Jean Teuffel, SLO

Lisa Thompson Mike Thorton

Chuck Tribbey, Arroyo Grande Wayne Trost, Arroyo Grande

Lola Vance

Charles Varni, Oceano

Maria Vidale-Elyes, Los Osos Carmella Vignocchi, Grover Beach

Renne Watson

Jim & Mary Webb, Cambria Margaret (P.J.) Webb, Cambria Chuck & Jacky Wheeler, SLO

Mary White, SLO

Rich Wike

Calvin Wilvert, SLO Rosemary Wilvert, SLO Keith Winns, Los Osos Dawn Wright, Redlands

Jill Zanek

David Zapf, SLO

Kenneth Melville, Idyllwild

Joan Carter, SLO
Janee Mallett
Chris Oferbig
Anna Sirkka
Stefan Bayres
Jane Willheim
Tyler Wilkerson
Jenna Smith

Daniel Neill, Oceano Douglas Pillsbury, SLO Susan Howe, Oceano Abe Perlstein, Los Osos Clarette Longden, SLO Roger Longden, SLO Jamie May, Atascadero Brenda May, Atascadero Kathie Nerelli, Shell Beach

Stephanie Sears, Atascadero

Frank Fiedler, Morro Bay Diane Danfield, Los Osos Thom Danfield, Los Osos

Debra Foster, SLO

Nancy Manter. Los Osos Gary Hamel, Oceano Paula Schultz, SLO Jane Nizny, Pismo Mary Wood, SLO Paul Keysaw, Fresno Roger Safarik, San Miguel Pat Cowdery, Cambria Marj Sewell, Cambria Michel South, Cambria James Koff, Cambria

Hilah C. Danell, Cambria
Constance M. Brauer, Cambria

Jan Harris, Cambria Barry Weaver, Lompoc Laure Weaver, Lompoc Amanda Rice, Cambria

Mark & Susan Garman, Cambria

Philip Christie, Cambria

Victoria Krassensky, Cambria

Avril Allan, Cambria Jo Ellen Butler, Cambria Sharon Harvey, Cayucos Tobey Crockett, Morro Bay Carol Chubb, Cayucos

Gail Clark, Morro Bay Forbio Madrid, Cambria William B. Warren, Cambria

Linda Mayer, Cambria Ronn Harsh, Cambria Stephen Beck, Cambria Dee Riegelhuth, Morro Bay

Michelle Leicester-Cadaret, Morro Bay

Carol Kirkpatrick, Morro Bay

Noach Tengesas, Morro Bay
Ginny Garelick, Morro Bay
Reo Cordes, Morro Bay
Tomme Young, Morro Bay
Pamela Hart Gentry, Agoura Hills
Carol Henderson, Cambria
Amanda Rice, Cambria
Vasco Bilelo Ilhavo
Chrisse Biondo, Houston
Frank DePasquale, Cambria
Kathy Dowding, Cambria
Mary M. Adamson, Cambria

Shirley Bianchi, Cambria Sarah Denka, Santa Barbara John Uebersax, Morro Bay Patricia Lee, Cambria Elliott Perkins Marcia Harvey Sue Harvey Ryan Walter



Cambria Fishing Club, Joslyn Center 950 Main St, Cambria, CA 93428 805-927-3364

www.cambriafishingclub.com

December 3, 2014

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

RE: Site Evaluation Proposal

The Cambria California Fishing Club is the oldest recreational fishing club on the central coast of California. We have a long history of support for measures that help further the goals of recreation and preservation of our abundant local marine resources. It is towards that end that we encourage the Director to consider the Chumash Heritage National Marine Sanctuary proposal, a rare opportunity to provide both ecological and cultural preservation along the California coast.

We live on the central coast and frequently fish in the Monterey Bay National Marine Sanctuary. We know that a sanctuary designation has not and will not interfere with the pursuit of our sport. With the Channel Islands National Marine Sanctuary to the south, we need protections for the irreplaceable resources that lie between the two sanctuaries.

Filling this gap makes sense ecologically and administratively. It is also the ancestral and present day home of the Chumash people, who have occupied this section of the coast for thousands of years. Their deep connection with the land and water of the central coast has led to a history of stewardship. Their desire to preserve significant cultural sites, many of which are now submerged, should be supported.

Please consider carefully the site proposal for the Chumash Heritage National Marine Sanctuary. We hope, along with many in the region, that this hole in federal protections along the central coast of California can finally be filled. Ending the disturbance of ancient Chumash cultural sites will preserve the dignity such places deserve.

Respectfully,

Jordan Pavacich, President

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000 SAN FRANCISCO, CA 94105- 2219 VOICE (415) 904- 5200 FAX (415) 904- 5400 TDD (415) 597-5885



January 6, 2015

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

RE: Support for Chumash National Marine Sanctuary Nomination

Dear Mr. Douros:

I write on behalf of the California Coastal Commission in support of the nomination of the Chumash Heritage National Marine Sanctuary offshore San Luis Obispo and northern Santa Barbara Counties. These waters have nationally significant marine, geological, biological and cultural characteristics, including abundant populations of diverse marine mammals and fish species, sensitive benthic habitats and kelp forests, major oceanic upwellings, and areas of unique beauty and cultural significance for the region's indigenous peoples. There is also significant public support for the designation of coastal waters from Santa Rosa Creek to Gaviota Creek as a National Marine Sanctuary, reflecting a growing consensus that the marine waters off the Central Coast are worthy of additional study and protection.

National Marine Sanctuary status is complementary with the California Coastal Act policies including those protecting water quality, marine and coastal habitats, recreational access, and archeological and aesthetic resources. The Commission and NOAA have a long history of successful partnership with respect to coast and ocean stewardship in and around the four existing marine sanctuaries in California. Integrated coastal management also will be increasingly important as we move forward with climate change adaptation, including addressing sea level rise and ocean acidification, proposed desalination facilities, coastal erosion and a whole host of related challenges. Sanctuary status enhances coordination efforts, scientific research relating to marine ecosystems and conditions, and funding opportunities.

Should the current proposal move forward, the Commission is prepared to support the effort in a collaborative manner that furthers both state and federal goals. This review will include coordination and review between NOAA and the Commission under the Coastal Zone Management Act for the establishment and management of any new or expanded National Marine Sanctuary. We look forward to our on-going shared management and protection of California's marine waters, including potential designation of a new marine sanctuary. Please let me know how my staff or I can be of any further assistance.

Sincerely,

CHARLES F. LESTER Executive Director

BOARD OF SUPERVISORS

1055 MONTEREY, ROOM D430 • SAN LUIS OBISPO, CALIFORNIA 93408-1003 • 805.781.5450



December 15, 2014

BRUCE GIBSON SUPERVISOR DISTRICT TWO

NOAA Office of National Marine Sanctuaries Attn: Mr. William Douros 99 Pacific St., Suite 100 Monterey, CA 93940

Dear Mr. Douros,

RE: Support for the Nomination of the Chumash Heritage National Marine Sanctuary

I write in support of the nomination of the Chumash Heritage National Marine Sanctuary off the Central Coast of California. The proposed marine sanctuary contains significant cultural, environmental, and ecological assets that are deserving of protection.

The proposed Chumash Heritage site is situated between two previously designated marine sanctuaries, Channel Islands and Monterey Bay. Closing the gap between the protected and unprotected sites will create a continuous marine sanctuary. The proposed site contains vital cultural resources, including submerged Chumash villages and sacred sites.

The area also features the Santa Lucia Bank, with benthic communities of world-wide significance, where 13 species of whales and dolphins gather and feed; three major upwellings; a 3,000 meter deep five-fingered submarine canyon; and cetacean gathering areas and migration lanes. This extraordinary offshore environment is deeply connected to shore ecosystems that include wetlands, coastal dunes, estuaries, and rookeries.

The Chumash Heritage National Marine Sanctuary would provide a legacy of prosperity, ensure healthy local coastal waters, preserve unique and significant coastal ecosystems, and strengthen the tourism-based economy of the Central Coast.

The nomination has gained the support of a wide variety of groups, including environmental, tribal and fishing organizations. I request that you support the nomination of the Chumash Heritage Marine Sanctuary. If you have any questions, please contact my office at 805-781-4338. Thank you.

BRUCE GIBSON

Sincerely,

Supervisor, District Two San Luis Obispo County CAPITOL OFFICE
STATE CAPITOL, ROOM 4035
SACRAMENTO, CA 95814
TEL (916) 651-4027
FAX (916) 651-4927
DISTRICT OFFICE

DISTRICT OFFICE 5016 N. PARKWAY CALABASAS SUITE 222 CALABASAS, CA 91302 TEL (818) 876-3352 FAX (818) 876-0802

California State Senate

SENATOR FRAN PAVLEY

TWENTY-SEVENTH SENATE DISTRICT

COMMITTEES
NATURAL RESOURCES & WATER
CHAIR
ELECTIONS
ENERGY, UTILITIES &
COMMUNICATIONS
ENVIRONMENTAL QUALITY
TRANSPORTATION & HOUSING

July 28, 2014

NOAA Office of National Marine Sanctuaries Attn: Mr. William Douros 99 Pacific St., Suite 100 Monterey, CA 93940

Dear Mr. Douros,

With the call for nominations for new National Marine Sanctuaries, I would like to convey my support for the Chumash Heritage National Marine Sanctuary off the Central Coast of California. The proposed marine sanctuary contains significant cultural, environmental, and ecological assets that are deserving of protection.

The proposed Chumash Heritage site is situated between two previously designated marine sanctuaries, Channel Islands and Monterey. Closing the gap between the protected and unprotected sites will create a continuous marine sanctuary. The proposed site contains vital cultural resources including submerged Chumash villages and sacred sites. The area also features the Santa Lucia Bank with benthic communities of world-wide significance where 13 species of whales and dolphins gather and feed; three major upwellings; a 3,000 meter deep five-fingered submarine canyon; and cetacean gathering areas and migration lanes. There is a vibrant marine ecosystem with kelp forests, sea otters, world-class fish diversity, and harbor seals. The wetland and on-shore ecosystems include coastal dunes, estuaries, and rookeries.

Active community support for the designation includes the following organizations: the Marine Sanctuary Alliance, Santa Lucia Chapter of Sierra Club, SLO Chapter of Surfrider Foundation, COAST, and Northern Chumash Tribal Council. The Chumash Heritage National Marine Sanctuary would provide a legacy of prosperity in healthy local coastal waters, preserve unique and significant coastal ecosystems, and strengthen the tourism-based economy of the Central Coast.

I request that you strongly consider the nomination for the Chumash Heritage Marine Sanctuary. If you have any questions, please contact Kara Seward at (818) 876-3352 in my District Office.

Sincerely,

Fran Pavley California State Senator

Fran Parley

27th District

Cc: Marine Sanctuary Alliance Mr. Frank DePasquale



January 27, 2015

NOAA Office of National Marine Sanctuaries Attn: Mr. William Douros 99 Pacific Street, Suite 100 Monterey, CA 93940

Sent via e-mail: william.douros@noaa.gov

Re: Support for Consideration of a Chumash Heritage National Marine Sanctuary

Dear Mr. Douros,

With the call for Sanctuary nominations underway, the Environmental Defense Center ("EDC") would like to convey its support for consideration of a Chumash Heritage National Marine Sanctuary proposed off the Central Coast of California. The proposed marine sanctuary contains significant cultural, environmental, and ecological assets that are deserving of protection.

The EDC protects and enhances the local environment through education, advocacy, and legal action. EDC's marine work has a long history of supporting expanding protection in our region, and we were among the first to advocate for creating both a National Park and National Marine Sanctuary at the Channel Islands.

The proposed Chumash Heritage National Marine Sanctuary is situated between two previously designated marine sanctuaries, Channel Islands and Monterey. The proposed site contains vital cultural resources including submerged Chumash villages and sacred sites. The area is also well known for its rich biological resources including the Santa Lucia Bank, the presence of thirteen whale and dolphin species, three major upwelling areas, and a 3,000 meter deep submarine canyon. These resources are well documented in an existing biogeographic study that was conducted in response to the public's interest in the expansion of the Channel Islands National Marine Sanctuary, back in 2005. EDC has closely tracked sanctuary proposals in our region and supports a new or expanded marine sanctuary off the Central Coast.

January 27, 2015 Support for Consideration of a Chumash Heritage National Marine Sanctuary Page 2

Following nomination, it is our understanding that NOAA will conduct an initial review. If the proposal meets designated standards, it will undergo further consideration. During this process, we expect NOAA will examine the ecological, historical, archaeological and cultural importance of the proposed region. We look forward to a NOAA process that will engage communities, native groups, and other entities before any nomination is accept or rejected. According to the NOAA nomination guidelines, acceptance requires "broad-based community support."

We look forward to continuing the conversation about on-going management and protection of California's marine waters, including potential designation of a new or expanded marine sanctuary. Thank you for your consideration of these comments. If you have any questions regarding this recommendation, please contact Kristi Birney at (805) 963-1622 or kbirney@EnvironmentalDefenseCenter.org.

Sincerely,

Linda Krop Chief Counsel Kristi Birney

Marine Conservation Analyst