

October 25, 2023

Mr. Paul Michel  
NOAA Sanctuaries West Coast Regional Office  
99 Pacific Street, Building 100F  
Monterey, CA 93940

Re: NOAA-NOS-2021-0080

Dear Mr. Michel,

We are writing to applaud the Administration for continuing the designation process of the proposed Chumash Heritage National Marine Sanctuary and write to express our strong support to include this national treasure within the National Marine Sanctuary System. The proposed sanctuary would protect sacred sites, hotspots of biodiversity, and productive marine habitats along the California coast. In the face of the dual crises of climate change and biodiversity loss and their resulting impacts on communities, cultures, traditions, and economies, national marine sanctuaries are critically important management tools to conserve marine biodiversity and safeguard the local communities and economies that depend on a healthy ocean ecosystem.

The waters off the Central Coast of California are some of the most biologically diverse and ecologically productive regions in the world. Fed by deepwater upwelling and ocean currents, the nutrient-rich waters off San Luis Obispo and northern Santa Barbara Counties support kelp forests, wetlands, estuaries, and rookeries and sustain a bountiful food web. These waters are crucial for vulnerable species such as the southern sea otter, listed as threatened on the Endangered Species list, and are critical habitat for wide-roaming species such as the leatherback sea turtle and blue whale. Preserving the intricate web of life that thrives in these waters, which sustains migrating wildlife, necessitates protecting it from harm that can result from human impacts.

Biodiversity plays a vital role in maintaining essential ecosystem functions. Anthropogenic stressors including habitat destruction, overexploitation, pollution, climate change and its related impacts, and the introduction and spread of non-native species are driving an unprecedented decline in marine biodiversity. Marine Protected Areas (MPAs) play a critical role in conserving the biodiversity of important marine ecosystems. Enhancing ecological connectivity among MPAs improves conservation outcomes by promoting biodiversity, population persistence and resilience, increased capacity to adapt to environmental change, and sustainable fisheries management.

One of the unique offshore features that would be protected by the proposed sanctuary is Rodriguez Seamount, a nearly mile-tall extinct volcano home to an astonishing variety of marine life. Scientists believe the seamount was once an island, making the area even more unique. The seamount has large colonies of corals and sponges as well as a high percentage of fish and invertebrate species not found on other nearby seamounts. Coral

colonies grow slowly at this depth and if injured, take a long time to recover. We are supportive of NOAA's proposal to designate a management zone to overlay the Rodriguez Seamount and adjacent seafloor structures to enhance the management of the area. Additional protections for the seamount provided by the proposed regulations would better protect this area of high biodiversity and deep-sea habitat.

The proposed sanctuary would also protect waters that are essential to the heritage of numerous Central Coast Tribes and Pacific ocean voyaging tribes predating European colonization. For millennia, Indigenous peoples have traversed these waters, forging a profound connection with their depths and the diverse marine life they harbor. The island and marine ecosystems co-evolved with these tribes and their culture and traditions that continue today. Some Chumash heritage sites, including evidence of astronomical observatories and other cultural resources, are now submerged in these waters.

There are also over 40 known historic shipwrecks in the region. The area encompassed by the proposed sanctuary contains Honda Point - the site of the Navy's worst peacetime loss of ships, as well as the gold-laden steamship S.S. Yankee Blade. Sanctuary designation would preserve these wrecks in perpetuity, allowing for the study and interpretation of these historically, culturally, and archaeologically distinctive national treasures.

The National Marine Sanctuary System holds key examples of progress toward proactive collaborative management and co-stewardship of ocean resources with Indigenous Peoples, but each example is and should be uniquely defined and developed, as is consistent with the principles of free, prior, and informed consent, and upholding the dignity of Indigenous Peoples. These communities hold long-standing connections to the lands and waters and generational knowledge, wisdom, and ways of knowing. Ocean protection and conservation must occur with Indigenous communities to collaboratively manage nationally significant resources, recognizing and re-enforcing the long-standing bio-cultural connections of peoples with nature and stewardship of these lands and waters.

This proposed sanctuary, nominated by the Northern Chumash Tribal Council, is the first tribally nominated sanctuary poised to achieve designation, and NOAA will engage in a collaborative partnership with the Indigenous Peoples who have been stewards of these waters and adjacent lands since time immemorial. This collaborative management stands as a testament to the rich tapestry of human connections with the sea, ultimately enhancing stewardship efforts and furthering the goals of the national marine sanctuary program. The educational and outreach programs initiated by the new sanctuary will serve as a conduit for the dissemination of Indigenous knowledge and stewardship values, fostering a deeper understanding and appreciation of the marine environment.

To best increase engagement and remove barriers, educational materials should be multicultural and multilingual.

The ocean is not merely a source of sustenance but also a global regulator, moderating temperatures, absorbing excess greenhouse gases, and generating approximately half of the oxygen essential for life on Earth. Climate change is disproportionately impacting the ocean and research underscores that this region is experiencing the impacts of climate change at an accelerated rate. The proposed sanctuary is uniquely positioned to serve as a living laboratory, offering insights into the dynamics of our changing climate. This research, integrated within the framework of the National Marine Sanctuary System's ecosystem-based management, alongside Indigenous knowledge and wisdom, holds great promise.

The proposed Chumash National Marine Sanctuary is poised to promote the long-term conservation of cultural resources, sanctuary waters, wildlife, and habitats while accommodating compatible human uses. We urge NOAA to designate the proposed sanctuary to conserve and celebrate these underwater national treasures and thank you for considering our perspectives.

Sincerely,