January 31, 2018

Ms. Kelly Hammerle, Manager
National OCS Oil and Gas Leasing Program
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Dear Ms. Hammerle:

I write to you on behalf of the Channel Islands National Marine Sanctuary (CINMS) Advisory Council to respond to the call for public comments on the Five-Year Outer Continental Shelf (OCS) Draft Proposed Program (DPP) for 2019 to 2024, as now proposed by the Bureau of Ocean Energy Management (BOEM) and referenced in Federal Register Volume 83, Number 5 (Monday, January 8, 2018), Pages 829-834, FR Doc No: 2018-00083. The CINMS Advisory Council’s 21-member body brings together community members and representatives from government agencies to advise CINMS and NOAA’s Office of National Marine Sanctuaries. This letter constitutes the CINMS Advisory Council’s comments and describes our opposition to the inclusion of any portion of the Pacific Region that could adversely impact national marine sanctuaries in the 2019-2024 DPP, most notably the CINMS and surrounding Santa Barbara Channel Region.¹ In addition, we request that BOEM provide additional public hearings in coastal areas, where communities will be directly impacted by new oil and gas development, and add an additional 60 days to the comment period.

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 forms a dynamic transition zone that is home to a myriad of sea life from

¹ The opinions expressed in this letter do not reflect the views of Federal agencies represented on the sanctuary advisory council. Additionally, the council is an advisory body to the sanctuary superintendent, and as such the opinions and findings of this letter do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration”.

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**Sanctuary Advisory Council**

**CHANNEL ISLANDS NATIONAL MARINE SANCTUARY**

Chair: Phyllis Grifman
Vice Chair: Dianne Black
Secretary: Michael Cohen

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**Members/Alternates**

Tourism
Andrea Mills / <vacant>

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 McCrea

Education
<vacant> / 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 / <vacant>

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 & 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]

Greater Farallones National Marine Sanctuary
Maria Brown / Brian Johnson [non-voting]

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https://channelislands.noaa.gov/sac/welcome.html
microscopic plankton to blue whales. Additionally, the area to the north of the Channel Islands that extends to the mainland supports high biodiversity and is considered an important ecosystem.\(^2\)

The last new oil and gas leases in California waters were issued in 1984. Since that time, the intensity of use in the Santa Barbara Channel has shifted away from new oil and gas development, with the area now utilized by increased commercial shipping, tourism and recreation, and a thriving marine environment that includes an increased population of endangered whales. New leases would inevitably lead to conflicts. For example, the seismic impacts from oil and gas exploration and development can harm marine life, and routine operations can lead to ship strikes on whales and impacts to fishing, recreation, and tourism.

National marine sanctuaries and adjacent waters provide benefits 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 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."\(^4\) Furthermore, the CINMS benefits businesses that offer visitor opportunities for non-consumptive enjoyment, such as sailing, kayaking, sightseeing, and diving. As a driver for tourism in our area, the CINMS also supports businesses such as hotels and restaurants, transportation and other tourism amenities in Santa Barbara and Ventura counties. Additionally, the Channel Islands National Park contributes $31.9 million and 315 jobs annually to the local economy.\(^5\)

The 1969 Santa Barbara Channel oil spill, and the more recent 2015 Refugio Beach oil spill, had devastating impacts on the marine environment, tourism and recreation, and the economy of the Santa Barbara Channel Region. While the Refugio Beach oil spill originated on the Gaviota Coast, oil traveled throughout the Santa Barbara Channel and south along the California coast, negatively impacting marine protected areas and causing beach closures in multiple counties.\(^6\) As we respond to the DPP, the Natural Resources Damage Assessment and restoration efforts are still underway. The Refugio Beach oil spill reminded us of the potential for oil spills that originate outside of the CINMS to enter its boundaries. In addition, spills that do not reach the CINMS may still cause injury to mobile marine species that freely travel across the sanctuary’s boundary, such as fishes, birds, and marine mammals.

\(^6\) Refugio Beach Oil Spill Natural Resource Damage Assessment Update. November 2015.
The CINMS Advisory Council understands that national marine sanctuary regulations prohibit oil and gas development within the CINMS.\(^7\) However, we remain concerned about the potential for leases to be issued and development to occur in waters surrounding the CINMS and other sanctuaries because, again as we saw with the Refugio Beach oil spill, oil can enter and injure sanctuary resources. As the DPP recognizes (Ch. 7.1.2), species listed under the Endangered Species Act in and near the Pacific OCS “could be impacted by potential oil- and gas-related activities.” Exclusion of the Pacific Region is consistent with several federal and state actions taken to protect this ecologically important and sensitive region, such as the creation of national marine sanctuaries and monuments, federal and state marine protected areas, and state and local resolutions opposing offshore oil. The 2017-2022 Proposed Final Program appropriately excluded the Pacific OCS.\(^8\)

In addition to the direct impact of oil spills on the CINMS, our Advisory Council has also expressed great concern for the impacts that fossil fuels have on our climate and oceans, such as ocean acidification and sea level rise.\(^9\) Increased fossil fuel production will exacerbate these issues that are already greatly impacting marine resources along the West Coast and in sanctuaries.\(^10\) Additionally, the expansion of offshore oil and gas production will deepen our dependence on fossil fuels and delay efforts to transition towards alternative, clean energy sources.

On behalf of the CINMS Advisory Council, I submit these comments in response to BOEM’s call for comments on the 5-year OCS DPP.

Sincerely,

Phyllis Grifman, Chair  
Sanctuary Advisory Council

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

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<th>Council Seat</th>
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