

CINMS Management Plan Revision Process

Summary of Public Scoping Comments Received *(Oct 1 through Nov 15, 2019)*¹

Issues Raised and Actions Suggested

1. Budget/Funding

Issue Summary: Commenters supported funding for major CINMS program areas: resource protection, research, and education and public outreach.

Actions Suggested by Commenters:

- 1.1 A few comments suggested increasing budgetary appropriations for staffing and other programmatic expenses.
- 1.2 A number of comments suggested securing funding for activities through partnerships with external organizations (such as the Benioff Ocean Initiative) and government agencies. Potential partnerships, including those that may yield additional resources for program activities, are included in the discussion of comments that address other issues.

2. Carbon Mitigation/Sequestration

Issue Summary: Some comments raised the role of CINMS in mitigating emissions of greenhouse gases and suggested actions to promote the sequestration of atmospheric carbon within the sanctuary.

Actions Suggested by Commenters:

- 2.1 Examine the contributions of sanctuary program activity to climate change and implement best management practices to reduce the carbon footprint of sanctuary operations.
- 2.2 Adopt long-term goals for carbon sequestration, rather than just monitoring and reducing emissions.
- 2.3 Permit, actively promote, or directly implement projects that would create carbon sinks or otherwise contribute to carbon sequestration. Such projects could include eelgrass restoration and/or artificial reefs designed to promote kelp forest growth.

3. Climate/Ocean Acidification Effects

Issue Summary: Climate change and ocean acidification underpins some of the most significant changes, shocks, and threats to sanctuary resources. The previous management plan did not sufficiently anticipate climate related effects over the last 10 years. Climate-related perturbations exacerbate other stressors that are more directly human-caused.

Actions Suggested by Commenters:

- 3.1 Develop a flexible climate action plan to guide mitigation, adaptation, and response to acute events (such as marine heatwaves).
- 3.2 Consider impacts of harmful algal blooms.
- 3.3 Consider impacts of sea level rise.

¹ This document provides a consolidated summary. For full records of public scoping comments submitted for NOAA's Channel Islands National Marine Sanctuary, visit the [regulations.gov](https://www.regulations.gov) website and enter docket number "NOAA-NOS-2019-0110".

- 3.4 Partner with local foundations, student volunteers, and universities on monitoring, mitigation of climate effects, and education.
- 3.5 Conduct a public education campaign on climate change effects and how the public can help to mitigate such effects.
- 3.6 Keep the 2016 Condition Report “fresh” by issuing small feature stories on impacts of acute events on the sanctuary.
- 3.7 Clearly identify climate-linked pressures in the management plan.
- 3.8 Reduce the carbon footprint of CINMS operations and activities.
- 3.9 Implement rapid assessment, monitoring and response to climate-related threats to resources, including mitigation.
- 3.10 Monitor climate-related changes to species distribution and habitat. Assess the resulting need for sanctuary boundary changes.
- 3.11 Establish a legal framework for rapid changes to sanctuary boundaries to respond to climate-related shifts.
- 3.12 Support research, such as by the UCSB Caselle Lab, to determine whether MPAs can mitigate climate change effects.
- 3.13 Research how other environmental factors, such as salinity, wind, currents, and particulates, may interact with ocean acidification.
- 3.14 Consider climate adaptation experiences of other California sanctuaries and marine parks.
- 3.15 Expand sanctuary boundaries and MPAs to boost the climate change resilience of species and conserve habitat.
- 3.16 Maintain regulations in MPAs.

4. Commercial Fishing

Issue Summary: A comment raised concerns that the area within the sanctuary that is open to commercial groundfishing is already too small.

Actions Suggested by Commenters:

- 4.1 Do not close additional areas to commercial harvest of rockfish.
- 4.2 Make more areas available to harvest of groundfish, as the availability of descending devices decreases fishing pressure on deepwater rockfish.

5. Consumptive Recreation

Issue Summary: A number of comments proposed actions that CINMS should take to promote and enhance recreational fishing in the sanctuary:

- A series of form letters associated with local recreational fishing users and businesses state that recreational anglers are the number one users of the sanctuary in terms of visitation hours and dollars spent.
- Comments from a recreational fishing organization state that sanctuary MPA regulations are excessive because MPAs primarily protect the benthic community and the Federal portions of sanctuary MPAs are generally in deeper waters than recreational anglers are allowed to fish for bottom-dwelling species. The comments also state that boat-based anglers who fish for pelagic species are subject to restrictions from both MPAs and temporary closures associated with military exercises.
- Access to sanctuary resources is important for both consumptive and non-consumptive recreational use.

Actions Suggested by Commenters:

- 5.1 Tailor visitor facilities on the islands and the mainland, potentially in partnership with the Channel Islands National Park, to promote both boat and shore-based recreational angling.
- 5.2 Develop a framework by which artificial reefs can be permitted within the sanctuary, and potentially construct artificial reefs. Proposed areas for artificial reefs are Anacapa Island (two 10-acre reefs), Santa Cruz Island (six 10-acre reefs), Santa Rosa Island (six 10-acre reefs), San Miguel Island (two 10-acre reefs). Within each reefing area, create custom restoration reefs designed with a variety of opening sizes, to protect and provide protected spaces for reproduction of certain depleted marine species (e.g. abalone) while preventing predator entry.
- 5.3 Alter the Gull Island, Footprint, and Santa Barbara Island Marine Reserves to allow for take of pelagic fish species, comparable to the Anacapa State Marine Conservation Area.
- 5.4 Expand no-take areas of marine reserves and marine conservation areas to enhance the beneficial “spillover” effects of these areas for recreational fishing.
- 5.5 Change marine reserve regulations to allow visitors to fish at Scorpion Anchorage.

6. Department of Defense activity

Issue Summary: The Department of Defense conducts a range of testing and training activity nearby the sanctuary, some of which involves infrastructure within the sanctuary.

Actions Suggested by Commenters:

- 6.1 Maintain existing DOD exemptions to sanctuary regulations.
- 6.2 Clarify or define sanctuary processes that support DOD infrastructure on the range, e.g. fiber optic cable to Santa Cruz Island.

7. Ecological Threats: Invasive Species

Issue Summary: Several comments raised the likelihood that ecological pressure from invasive species would likely increase in the future with increasing factors such as changing water temperatures and increased vessel activity (and associated ballast water discharge). Algal species mentioned included *Sargassum horneri* and *Undaria Pinnatifida*.

Actions Suggested by Commenters:

- 7.1 Conduct long-term monitoring of invasive species. Incorporate monitoring data from the NPS kelp forest surveys and Partnership for Interdisciplinary Studies of Coastal Oceans (“PISCO”) long-term sampling. Continue to support monitoring efforts by sharing vessel use, data, etc.
- 7.2 Develop and implement response plans to research, monitor, and mitigate (such as through control, management, and culling interventions) invasive species.
- 7.3 Develop capabilities to predict what species may be introduced in the sanctuary in the future.
- 7.4 Suggested partners include Channel Islands National Park, California Department of Fish and Wildlife, and University of California Santa Barbara.

8. Ecosystem Connectivity

Issue Summary: Ecosystem connectivity and migration corridors are important to ecosystem function of the sanctuary.

Actions Suggested by Commenters:

- 8.1 In determining future boundaries for the sanctuary and for MPAs within the sanctuary, consider migration corridors and connectivity among MPAs (including those along the mainland coast).

9. Existence/Economic Value

Issue Summary: A number of comments cited the sanctuary’s existence value or economic value as a site for outdoor recreation, habitat for wildlife, example of good governance for conservation, and as an heirloom resource for future generations.

Actions Suggested by Commenters:

- 9.1 Maintain the sanctuary designation and existing regulations, including the prohibition on new oil and gas activity.
- 9.2 Expand marine reserves to increase species density and recreational value.
- 9.3 Explore ways to expand boundaries and increase protections.
- 9.4 Continue to use socioeconomic reports to highlight the benefits of protecting sanctuary resources over consumptive and extractive activities.

10. Fishing Pressure

Issue Summary: Multiple commenters raised the need for better information on location and level of fishing activity. Species abundance and diversity have declined as resource users have “fished our way down the food chain” around the northern Channel Islands. The Condition Report and other studies have linked MPAs and increased biomass, both inside and outside MPAs, for species under high commercial and recreational fishing pressure.

Actions Suggested by Commenters:

- 10.1 Increase MPA enforcement effort.
- 10.2 Expand sanctuary boundaries.
- 10.3 Expand no-take areas with no exceptions for pelagic species. The comment cited the Galapagos Islands as a model for marine reserve protections that benefits the tourism economy.
- 10.4 Prohibit certain types of fishing gear, such as nylon driftnets, because of the biomass that they remove from the water.
- 10.5 Consider temporal zoning and closures to give living resources time to recover and increase species diversity and resiliency.
- 10.6 Collect higher resolution data/observations to monitor impacts of fishing and management actions. Explore enhancing data acquisition from radar stations, drones, satellites, electronic monitoring, AIS recorders on small vessels, and volunteers (using a combination of the Whale Alert app and the Sanctuary Aerial Monitoring and Spatial Analysis Program, or similar program).
- 10.7 Conduct data deficient (fisheries) analyses in conjunction with attribution science.
- 10.8 Census approach to fishery management: manage fisheries by conducting fish censuses inside and outside the protected areas, and setting quotas based on the difference (see additional detail at comment letter [NOAA-NOS-2019-0110-0028](#)).

11. Habitat & Living Resources/Nonconsumptive Recreation

Issue Summary: Several comments expressed concern about the impacts on habitats, wildlife, and ecosystems within the sanctuary from various pressures. Such pressures include climate change, ocean acidification, ship traffic, recreational use, invasive species, commercial fishing, and nearby mineral extraction.

Comments also addressed species with declining or endangered populations. A few comments brought up recent studies that show the effectiveness of marine protected areas.

Several comments also addressed the importance of the sanctuary for non-consumptive recreation, both through established operators/outfitters and by nearby residents. One comment noted that the Santa Barbara Channel is a growing destination for seabird viewing.

Actions Suggested by Commenters:

- 11.1 Continue and build new partnerships to protect species and habitats, and to enforce sanctuary regulations.
- 11.2 Expand boundaries to include the remainder of the Santa Barbara Channel, and northward to the boundary of the proposed Chumash Heritage national marine sanctuary site.
- 11.3 Based on evidence of their effectiveness, expand marine reserves to increase species diversity and abundance, as well as to protect whale habitat and migration areas. One comment proposed expanding marine reserves to encompass the north side of all four Northern Channel Islands and the entirety of waters surrounding Anacapa Island.
- 11.4 Expand ROV exploration of deep sea corals.
- 11.5 Engage in active restoration of abalone, otters, and eelgrass.
- 11.6 Develop a list of indicator species and use them to evaluate the effectiveness of MPAs and other resource protection. Communicate monitoring findings to the public.
- 11.7 Engage in collaborative research and monitoring, including with CDFW, on abalone and evaluation of the MPA network.
- 11.8 Expand partnership with the U.S. Fish and Wildlife Service to monitor migratory birds and improve outcomes for endangered species.
- 11.9 Consider habitat restoration in and around MPAs.
- 11.10 Continue current regulations within marine protected areas.
- 11.11 Focus research efforts on impacts of human activity and how to mitigate them.
- 11.12 Increase visitor education on potential impacts of recreational use.
- 11.13 Address guidelines for permitting and construction of artificial reefs in the management plan.

12. Hazardous Waste

Issue Summary: A comment raised concerns about a disused dumping area for radioactive waste near Santa Cruz Island (outside the CINMS boundary). According to the commenter, the site also contains military waste from the Navy.

Actions Suggested by Commenters:

- 12.1 Partner with the Navy to assess the deterioration of radioactive waste containers and monitor any potential impacts to marine life.

13. Inspire Momentum

Issue Summary: Commenters suggested various program activities to inspire both wonder in and protection of sanctuary resources, as well as momentum for broader ocean health.

Actions Suggested by Commenters:

- 13.1 Provide more science training or funding to K-12 schools and other education providers such as museums and nonprofits. Expand educational programs beyond one-time field trips to include

ongoing experiences such as beach cleanups, letter writing to elected officials, citizen science, and broader integration with curricula. One comment supported including messaging on everyday choices that affect conservation of sanctuary resources, such as reducing water use and using renewable energy.

- 13.2 Restart formal education projects that inspire children’s stewardship ethic, such as Los Marineros.
- 13.3 Use more visual aids, such as parade floats or flying balloon drones of charismatic megafauna, to inspire students.
- 13.4 Continue use of the NMS “whale tail” logo.
- 13.5 Engage in opportunistic outreach opportunities, such as tables at Patagonia retail locations.
- 13.6 Strengthen the partnership with Channel Islands Boating Center to offer more hands-on learning opportunities to community colleges and high schools
- 13.7 Engage with local advocacy organizations to help develop their environmental positions and agendas. Examples include Chumash groups, Surfrider Foundation, and local Republican Party organizations.
- 13.8 Conduct public outreach campaigns to highlight profiles of sanctuary users who depend on the sanctuary for their livelihoods, such as port workers or scientists.
- 13.9 Empower youth to engage in community organizing through paid internships, volunteer programs, and job skills workshops.
- 13.10 Use youth activism on climate change as a conduit for delivering conservation messages more broadly.
- 13.11 Look to potential partnerships and model programs: Fund for Santa Barbara, Quasars to SeaStars (high school citizen science program), Santa Barbara Natural History Museum, Wilderness Youth Project, Santa Barbara Channel Keeper, Explore Ecology, Heal the Ocean.
- 13.12 Continue to support the work of the Channel Islands Naturalist Corps.

14. Interagency Collaboration

Issue Summary: A few commenters suggested opportunities for maintaining and expanding interagency collaboration, especially with respect to regulation and enforcement.

Actions Suggested by Commenters:

- 14.1 Expand cooperation and coordination with the CDFW, USCG, and NOAA Office of Law Enforcement to improve enforcement of regulations (such as prohibitions on fishing in MPAs, illegal discharges, and seafloor disturbance).
- 14.2 Share lessons-learned regarding resource management and program successes with domestic partners, with other sanctuaries, and internationally.
- 14.3 CDFW commented that changes to the sanctuary’s regulations and the MPA network are not needed at this time, and that CDFW would need to be included in developing any MPA regulatory change proposals in the future.

15. Mainland Air Quality

Issue Summary: A comment expressed concern about air quality in Ojai and Simi Valley.

Actions Suggested by Commenters:

- 15.1 NOAA should study the impact of pollutants [from ship traffic] on air quality in Ojai and Simi Valley.

16. Marine Debris

Issue Summary: Marine debris adversely affects sanctuary resources in the water column and the seafloor. Comments addressed the role of CINMS in preventing, removing, and assessing marine debris.

Actions Suggested by Commenters:

- 16.1 Work with the marine debris community to address marine debris sources.
- 16.2 Address sources of marine debris. Pursue partnerships with entities that produce, distribute, or discharge marine debris material, such as Starbucks and commercial lobster harvesters.
- 16.3 Prohibit plastic pollution.
- 16.4 Improve understanding of marine debris sources, types (such as microplastics or fishing gear) locations, and impacts (such as entanglement and ingestion). Track changes in marine debris quantity and distribution.
- 16.5 Continue microplastics research with specific relevance to the Santa Barbara Channel and the Channel Islands. Apply existing nanoplastics work by the UCSB Bren School and NCEAS.
- 16.6 Conduct or fund more marine debris removal, including through partnerships such as training programs for fishers. Continue removal projects that involve NGOs, tour operators, and the public (including high school students with community service requirements).
- 16.7 Rapidly assess marine debris threats and focus efforts on response actions.
- 16.8 Use volunteers and citizen science efforts, such as with visitors to the islands, to remove and record debris. Consider the Adventure Scientists Program, which trains recreational users, as a program model.
- 16.9 Provide better information to the public on marine debris impacts in the sanctuary to help message the need for broader action to reduce marine debris and its impacts.

17. Maritime and Cultural Heritage/Indigenous Knowledge

Issue Summary: Commenters raised issues relating to the *Conception* tragedy, Chumash heritage and collaboration, and traditional ecological knowledge.

Actions Suggested by Commenters:

- 17.1 Designate a “marine preserve” at the site of the *M/V Conception* tragedy.
- 17.2 Work with interagency and other appropriate partners to incorporate Chumash input into interpretive signage on the islands.
- 17.3 Collaborate and/or consult with all Chumash bands, regardless of Federal recognition status, on sanctuary management.
- 17.4 CINMS should understand and remove barriers to the continuation of indigenous traditional knowledge. CINMS should consider incorporating best practices from the NOAA Sea Grant Report, “Traditional and Local Knowledge: A Vision for the Sea Grant Network” in science-based management, including prioritization of research topics.

18. Noise & Light Pollution

Issue Summary: Human activities that generate noise and light pollution in the sanctuary are intense and increasing. Noise adversely affects the ability of wildlife to feed, navigate, communicate, and reproduce. In

addition, CINMS can act as a noise sanctuary. Artificial light can attract, disturb, confuse, and disorient marine wildlife. In addition, the Channel Islands are significant as a dark sky area for amateur astronomers.

Actions Suggested by Commenters:

- 18.1 Continue to monitor and assess ocean noise in order to better implement strategies to mitigate such noise impacts.
- 18.2 Expand the existing Area to be Avoided (ATBA) or the sanctuary's outer boundary to increase the area of noise protection. Expand sanctuary boundaries to include more of the Santa Barbara Channel TSS (shipping lane), and to regulate ship speed.
- 18.3 Analyze artificial light emissions and implement strategies to mitigate light pollution.
- 18.4 Exclude drilling and boating from marine protected areas.

19. Oil & Gas Risks

Issue Summary: Commenters expressed concern about the continued presence of offshore oil and gas extraction activity near the sanctuary, and its effects on sanctuary resources. These effects may include related vessel traffic, noise, seismic surveys, infrastructure construction, and spills. Multiple comments cited the Refugio Beach oil spill. Some comments were also concerned that recent Presidential Executive Orders would lead to more oil and gas exploration, development and extraction near the sanctuary. One commenter cited BOEM's proposed 2017-2022 and 2019-2024 Leasing Programs, released in 2014 and 2016 respectively, as causes for concern.

Actions Suggested by Commenters:

- 19.1 Advocate for increased fuel economy requirements to decrease demand for oil extraction near the sanctuary.
- 19.2 Increase public awareness of oil and gas activity near the sanctuary and its impacts.
- 19.3 Use deep sea coral monitoring to track the impacts of hydrocarbon extraction, including methane hydrate harvesting.
- 19.4 Assess potential impacts, and monitor and mitigate actual impacts, of new proposed oil and gas development near the sanctuary.
- 19.5 Conduct monitoring to track impacts of oil and gas activity on sanctuary resources.
- 19.6 Use FEMA planning as a model for rapid response planning.
- 19.7 Add a no-leasing buffer around the sanctuary, possibly by expanding sanctuary boundaries.
- 19.8 Continue prohibition on oil and gas development in the sanctuary and continue to enforce this prohibition.

20. Oil Platform Decommissioning

Issue Summary: A few comments addressed the impending decommissioning of offshore oil platforms near the sanctuary. One raised concerns about the impacts of decommissioning activities on sanctuary resources. Other comments addressed the potential habitat value of residual infrastructure.

Actions Suggested by Commenters:

- 20.1 Develop oil spill contingency plans.
- 20.2 Actively monitor sanctuary resources to assess impacts of decommissioning activities.
- 20.3 Address decommissioning impacts to the sanctuary in the EIS.
- 20.4 Identify infrastructure that should be left in place as habitat.
- 20.5 Remove oil platforms near the sanctuary.

- 20.6 As oil platforms are decommissioned, ensure removal of spent jackets and other platform components.
- 20.7 Expand sanctuary boundaries to encompass areas previously precluded from designation by the presence of oil platforms.

21. Operational Risks

Actions Suggested by Commenters:

- 21.1 Develop a vessel management plan.

22. Other Developments - Aquaculture

Issue Summary: Interest in commercial marine aquaculture is increasing.

Actions Suggested by Commenters:

- 22.1 Consider the potential ecosystem benefits, especially for shellfish and kelp, of allowing aquaculture in and around the sanctuary with strict permitting standards.
- 22.2 Be cautious of allowing any aquaculture near the sanctuary that may have adverse environmental impacts such as the introduction of pathogens, pollutants, and exotic species.

23. Other Developments - Renewable Energy

Issue Summary: Waters near the CINMS boundaries are presently under consideration for major floating offshore wind electrical generating projects and related subsea electrical transmission lines. Such projects may have regional scale impacts and affect living marine resources, such as birds.

Actions Suggested by Commenters:

- 23.1 Take a proactive and precautionary role, as a sister agency to the Bureau of Ocean Energy Management (BOEM), in responding to floating offshore wind energy proposals.

24. Other Activities - Unmanned Systems

Actions Suggested by Commenters:

- 24.1 Address the use of unmanned aircraft systems in the sanctuary.

25. Political Priorities

Issue Summary: A number of comments addressed perceived risk that the Administration would seek to reduce the area of the sanctuary. One comment mentioned advocacy by conservation groups to protect 30 percent of the world's ocean by 2030.

Actions Suggested by Commenters:

- 25.1 Maintain boundaries.
- 25.2 Expand boundaries north to Cambria.
- 25.3 Work with national advocacy groups in Washington, D.C. to build support for maintaining sanctuary regulations.

26. Program Evaluation

Issue Summary: Two comments addressed opportunities and approaches to conduct program evaluation.

Actions Suggested by Commenters:

- 23.6 Apply socioeconomic research beyond understanding recreational activity; use attributional science on human activity to evaluate effectiveness of management actions, including the MPA network.
- 23.6 Seek out models of policy flexibility from other agencies.
- 23.7 Develop indicators to measure consequences of management actions in the MPA network, working with BOEM and other partners.

27. Researcher Access

Issue Summary: Two comments addressed access to the sanctuary by researchers and permitting for research.

Actions Suggested by Commenters:

- 27.1 Remove barriers to access and specimen collection, such as permitting.
- 27.2 Work with the Channel Islands National Park, The Nature Conservancy, and universities to continue to allow research activity in and around the sanctuary.

28. Shipping

Issue Summary: Several comments addressed the increased risk to wildlife and air quality from increased marine shipping. Commenters raised concerns that the impending Port Hueneme expansion and increases in cruise ship transits will combine with overall global trends in maritime commerce to increase ship traffic through the sanctuary. In addition, another comment raised concern that the IMO's extension of low sulfur fuel standards to international waters may cause additional ship traffic to reroute to the Santa Barbara Channel and through the sanctuary.

The speed and frequency of vessel transits pose a risk to whales in the sanctuary. One comment cited research from the International Monetary Fund calculating that each great whale sequesters around 33 tons of carbon dioxide, equivalent to thousands of trees, and provides an average value of over \$2 million dollars per whale, easily over US \$1 trillion for the current stock of great whales. One comment argues that NOAA is required under the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA) to take stronger regulatory action to protect whales. Reducing vessel speed also reduces fuel consumption and improves air quality in and around the Santa Barbara Channel.

Actions Suggested by Commenters:

- 28.1 Increase public outreach for the Vessel Speed Reduction (VSR) program.
- 28.2 Research how increased ship traffic will affect management of sanctuary resources.
- 28.3 Expand the VSR program to include more participants, including cruise ships.
- 28.4 Incorporate elements of U.S. Representative Alan Lowenthal's proposed Blue Whales and Blue Skies Act into the management plan.
- 28.5 In the NEPA review for the management plan, discuss the VSR program's environmental benefits, including its benefits to air quality.
- 28.6 Expand the sanctuary boundary and reroute shipping traffic outside the sanctuary.

- 28.7 Continue to engage with Air Pollution Control Districts and the California Air Resources Board on diesel emissions and vessel impacts to whales.
- 28.8 Engage with Port Hueneme to expand participation in the VSR program through a public-private partnership and monetary incentive program.
- 28.9 Seek third-party funding, such as through corporate sponsorships, for VSR incentive payments.
- 28.10 Continue to work with the National Marine Fisheries Service on the Draft Revised Recovery Plan for the Blue Whale.
- 28.11 Consider the recommendations of the CINMS advisory council's Marine Shipping Working Group, including expanding the Area to be Avoided (ATBA) and moving the shipping channel (Traffic Separation Scheme) further offshore. Other comments suggested moving the shipping channel to the south side of the islands.
- 28.12 Establish speed limits for vessels within the sanctuary, similar to speed limits on the East Coast for northern right whales.

29. Socioeconomic & Environmental Justice

Issue Summary: Several comments raised socioeconomic and environmental justice concerns about the demographics of visitors to the sanctuary and the reach of education programs.

Actions Suggested by Commenters:

- 29.1 Ensure that all aspects of education and outreach include strong consideration and inclusion of diverse audiences.
- 29.2 Conduct a demographic study of visitation to the sanctuary.
- 29.3 Work with other government agencies to be more inclusive of minorities and language minorities.
- 29.4 Explore new partnerships to expand on-site educational, nonconsumptive recreation, and other visitation opportunities for underserved populations. Such populations may include lower income students and households, and members of the Chumash community. The Santa Barbara Channelkeeper dive program is an example of such a program. Funding may be available from the Fund for Santa Barbara and the Sara Miller McCune Foundation.
- 29.5 Explore partnerships to promote water safety skills for underserved populations.
- 29.6 Expand the number of transportation providers for recreational access beyond Island Packers.
- 29.7 Officially define Chumash rights, claims, and privileges with respect to sanctuary resources.

30. Technical/Procedural Comments

Issue Summary: Two comments provided technical and procedural recommendations with respect to the preparation of an environmental review document.

Actions Suggested by Commenters:

- 30.1 Technical recommendations were provided by the Environmental Protection Agency regarding preparation of an Environmental Assessment or Environmental Impact Statement (see comment letter [NOAA-NOS-2019-0110-0053](#) for details).
- 30.2 Include public health considerations in the NEPA review.
- 30.3 Incorporate new research and scientific advances into consideration of new management actions.

31. Visitor/Community Engagement

Issue Summary: Several comments suggested opportunities for augmenting engagement with visitors and the community to raise awareness about the sanctuary, build public support for its conservation, and increase compliance with regulations.

Actions Suggested by Commenters:

- 31.1 Continue to partner with CDFW on creating outreach materials on sanctuary and state resources.
- 31.2 Continue to collaborate with the community on planning and management of the sanctuary, and seek public input more often than once every 10 years.
- 31.3 Continue to promote the sanctuary through outreach, social media, and stakeholder interaction. These efforts should include information on how to access sanctuary resources, and should extend beyond regular recreational and commercial users, including targeting lower income constituencies.
- 31.4 Increase outreach to resource users to increase regulatory compliance.
- 31.5 More actively promote fishing and other consumptive recreation through advertising, education (to sportfishing organizations), and website content.
- 31.6 Consider resurrecting the Alo'koy (printed sanctuary newsletter) or similar outreach materials.
- 31.7 Conduct an assessment of how to most effectively raise public awareness about the sanctuary.
- 31.8 Create a lecture series for local audiences.
- 31.9 Build a visitor center or increase CINMS presence at existing visitor centers.
- 31.10 Designate a contact person in the community to build educational partnerships.
- 31.11 Continue to partner with the UCSB Bren School on projects to inform sanctuary management.
- 31.12 Consider partnerships with private owners of aircraft to assist with citizen science efforts.
- 31.13 Continue and increase support to partners, including Channel Islands Naturalist Corps Volunteers, Native American Chumash, University of California-Santa Barbara ocean sciences, NOAA's national marine sanctuaries, the Sierra Club, Surfrider Foundation, and other organizations.

32. Water Quality

Issue Summary: Commenters referenced various water quality concerns: pollutants from mainland sources, pollutants seeping from sediments, brine from potential desalination projects, microfibers and perfluoroalkyl substances (PFAS) from wastewater treatment plants, and graywater and other pollution from cruise ships.

Actions Suggested by Commenters:

- 32.1 Test graywater and other discharges from cruise ships.
- 32.2 Build on partnerships with watershed management groups, including UCSB and Santa Barbara Channelkeeper.
- 32.3 Engage citizen scientists in developing solutions to water quality challenges.
- 32.4 Work with the Integrated Ocean Observing System (IOOS) and Southern California Ocean Observing System (SCOOS) to add buoys near port areas to observe ocean chemistry. Engage port communities, fishing communities, and the Pilots' Association on potential funding partnerships for such observations.
- 32.5 Study the potential impacts of desalination projects proposed in Santa Barbara and other areas near the sanctuary.
- 32.6 Monitor the water quality impacts of dredging near Port Hueneme.

33. Whale Mortality

Issue Summary: One comment argues that NOAA is required under the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA) to take stronger regulatory action to protect whales.

Actions Suggested by Commenters:

- 33.1 Limit vessel speed in the sanctuary to 10 knots.
 - 33.2 Ban fishing in the sanctuary.
-