

Alliance of Communities for Sustainable Fisheries
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Ms Adrienne Thomas, PRA Officer

May 6, 2020

NOAA

151 Patton Ave, Rm 159

Asheville, NC 28801

RE: Proposed Information Collection; Comment Request; Nomination Process for National Marine Sanctuaries

Dear Ms Thomas,

Please accept these comments from the Alliance of Communities for Sustainable Fisheries (ACSF).

The ACSF is a 18-year-old 501(c)(3) not-for-profit organization, founded for the purposes of educating the public on fisheries issues, connecting fishing men and women ("fishermen") with their communities, and representing fishing interests in state and federal processes. The ACSF is a regional organization, with commercial fishing leaders, representing Monterey, Moss Landing, Santa Cruz, Morro Bay, Pillar Point, and Port San Luis, on our Board of Directors. Port communities, several recreational fishing organizations, and the California Wetfish Producers Association (squid, sardines, etc), also have representatives on our Board. Thus, the ACSF represents a large cross-section of fishing and community interests for the Central Coast of California. ACSF members have extensive experience with the California National Marine Sanctuaries (NMS).

The current nomination criteria for a future NMS includes this:

"Nominations should demonstrate broad support from a variety of stakeholders and interested parties."


Commenting on the *practical utility*, the *accuracy*, and the *quality and clarity* of information collected, the ACSF believes, based on experience, that further criteria be developed to define "broad support". Specifically, an inventory should be created of stakeholders who are directly economically dependent on the marine life of the proposed NMS area. A clear consensus of these stakeholders would be needed to demonstrate "broad support".

Further, using the example of the 2015 Chumash Heritage NMS nomination, clearly something is wrong, or inadequate, about the NMS's nomination process. Not only was this nomination opposed by all of the region's major commercial fishing organizations, it was also opposed by ranchers and growers, the County Board of Supervisors, a city, and at least two chambers of commerce—yet, NMS leaders determined that the nomination demonstrated "broad support".

The ACSF submits that more accurate and practical metrics must be developed to qualitatively weigh what it means to demonstrate broad support for a NMS nomination.

Second, the NMS criteria for an "*area of national significance for natural resources*" also needs further definition. Again using the Chumash Heritage NMS accepted nomination as an example, there is no doubt but the proposed area has great habitat and an abundance of natural (fish, whales, etc), but this is true for much of the US west coast. Further, the great existing condition of these resources is due to a very large degree to the effectiveness of existing state and federal laws and agencies. There must be more detail on what constitutes *national significance*. If everything is special, nothing is special.

Thank you for considering comments from the Alliance of Communities for Sustainable Fisheries.



Kathy Fosmark

Co-Chair



Frank Emerson

Co-Chair