AMERICAN SPORTFISHING ASSOCIATION

October 25, 2023

Paul E. Michel, Regional Policy Coordinator
NOAA Sanctuaries West Coast Regional Office
99 Pacific Street, Suite 100F
Monterey, CA 93940

Re: NOAA-NOS-2021-0080, Proposed Designation of Chumash Heritage National Marine Sanctuary

Dear Mr. Michel:

Thank you for the opportunity to review and provide comments regarding the Environmental Impact Statement and Management Plan (NOAA–NOS–2021–0080) for the Chumash Heritage National Marine Sanctuary. The American Sportfishing Association (ASA) represents the nations sportfishing industry and the recreational fishing community. Our over 900 members include manufacturers, retailers and allied organizations that comprise the $148 billion recreational fishing economy. In California, saltwater recreational fishing supports 5,083 jobs and generates $718 million annually in sales[1]. For over 90 years ASA has been a unified voice for the industry and anglers when emerging laws and policies could significantly affect business or sportfishing itself.

ASA appreciates the acknowledgement that recreation is economically and socially important within the 5,617-square miles being proposed for designation as the Nation's newest National Marine Sanctuary (NMS). We appreciate that the proposed rule is clear that the designation of the Sanctuary will not directly impact fisheries management. For example, Section V(F)(II) states, "*The proposed rule does not propose to regulate commercial fishing or recreational fishing*." In addition, Article V of the Proposed Terms of Designation for Chumash Heritage National Marine Sanctuary states, "*Article IV does not authorize the direct regulation of lawful fishing activities within the Sanctuary, such as setting catch quotas, establishing spatial closures for fishing, or setting fishing seasons*." We want to highlight the importance of continued coordination with, and deference to, the Pacific Fisheries Management Council (PFMC) and California Fish and Game Commission (CFGC) regarding the management of fisheries within the sanctuary. ASA appreciates the commitment made by Mr. John Duros (Regional Director Office of National Marine Sanctuaries) at the September 2022 PFMC meeting in Boise, Idaho, to work with stakeholders and the Council regarding any potential need for fishing regulations in the future.

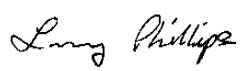
[1] National Marine Fisheries Service. 2022. Fisheries Economics of the United States, 2020. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-236A, 231 p

We want to reinforce the importance of allowing recreational fishing in Sanctuaries. Recreational anglers are our Nation's original conservationists. In California alone there are 1,157,000 saltwater anglers. Anglers' connection to the water fosters a deep appreciation for the environment and commitment to keeping it healthy. Through fishing license purchases, excise taxes and direct donations, the recreational fishing community contributes approximately $1.7 billion toward aquatic resource conservation each year.

ASA and our partners believe strongly that regulations that are necessary for conservation be developed under existing regulatory processes (PFMC and CFGC). Furthermore, we support moving forward with the designation process because it recognizes the numerous threats to the marine resources in this area (stormwater runoff, plastics, marine traffic, oil spills, etc.). The establishment of the Chumash NMS will also help achieve the goals of protecting 30% of our Nation's oceans by 2030 as directed by President Biden.

We look forward to working closely with NMS staff to ensure we have healthy fisheries resources and access to them.

Sincerely,



Larry Phillips
Pacific Fisheries Policy Director
American Sportfishing Association