

SANTA YNEZ BAND OF CHUMASH INDIANS

P.O. BOX 517 · SANTA YNEZ · CA · 93460

Tel: 805.688.7997 · Fax: 805.686.9578

www.chumash.gov

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John Armor
Director, Office of National Marine Sanctuaries
National Oceanic and Atmospheric Administration
1305 East-West Hwy
Silver Spring, MD 20910

Dear Director. Armor:

We, the Santa Ynez Band of the Chumash Indians and the International Connectivity Coalition (ICC), write to express our unified support for the designation of the Chumash Heritage National Marine Sanctuary. We ask that this designation allow for the maintenance and expansion of submarine communication cables within the Sanctuary boundaries to ensure that Indian Country and other underserved communities across the nation can have access to expanded, affordable and reliable internet in the years to come.

For generations, indigenous communities have been subjected to a communications gap compared to other parts of the United States. Even today, this gap is pervasive. According to the Federal Reserve Bank of Minneapolis:

- Households in tribal communities are 21 percent less likely to have access to the internet than neighboring non-tribal communities;
- Download speeds in tribal communities are 66 percent slower than download speeds in neighboring non-tribal communities; and
- Upload speeds in tribal communities are 78 percent slower than download speeds in neighboring non-tribal communities.

Reliable access to and expansion of subsea cables and the corresponding investment in internet infrastructure along the California Central Coast will play a significant role in helping address these shortcomings over time.

Importantly, we believe that submarine cables and conservation can co-exist within the boundaries of the proposed sanctuary. The existing regulatory structure relies on layers of environmental reviews and permitting from multiple federal agencies—including the USACE, NOAA and the FWS—as well as rigorous analysis and permitting by the State of California's Lands Commission and Coastal Commission. This regulatory structure has allowed for a dramatic expansion in connectivity in recent years while ensuring that subsea and coastal resources receive the protection they deserve. Consequently, provided this existing process is followed after a Sanctuary declaration, we believe this level of review should negate the need for further permitting, including utilization of NOAA's Special Use Permits.

Since these subsea cables will be leveraged to expand the capacity of the U.S. telecommunications to grow in a way that allows for increased connectivity in Indian Country and in other underserved communities, we respectfully urge the current regulatory and permitting processes be deemed adequate for managing submarine cable activities within the sanctuary boundaries.

The Santa Ynez Band of the Chumash Tribe and the ICC are committed to advancing technological development while respecting and preserving cultural heritage and environmental integrity. The cooperative approach between these entities exemplifies a balanced path forward, where technological advancement and environmental conservation go hand in hand. We look forward to working with NOAA to ensure these shared goals are met within the boundaries of a future Chumash Heritage National Marine Sanctuary.

Sincerely,



Kenneth Kahn
Chairman, Santa Ynez Band of Chumash
Indians



Elaine Albrich
on behalf of the International Connectivity
Coalition