



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL OCEAN SERVICE**  
**Office of National Marine Sanctuaries**

Cordell Bank National Marine Sanctuary  
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Mr. Dan Wolford, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Chairman Wolford:

Cordell Bank National Marine Sanctuary (CBNMS or sanctuary) appreciates the opportunity to respond to the request for proposals issued by the Pacific Fishery Management Council (Council) to modify Pacific coast groundfish essential fish habitat (EFH) designations.

CBNMS was designated in 1989 to protect a vibrant marine community located on the continental shelf and slope, west of Point Reyes. The sanctuary is situated in the California Current ecosystem and benefits from intense coastal upwelling generated at Point Arena, one of the strongest and most persistent upwelling centers on the west coast of North America. The nutrients from upwelling are carried to the sanctuary by prevailing currents and form the foundation for productivity at all trophic levels. In addition to resident fishes, seabirds and marine mammals, migratory animals of all these species travel to CBNMS to feed in the summer and fall when annual productivity is peaking. In addition to the Bank, the sanctuary protects soft sediment habitats on the continental shelf and soft and hard bottom areas on the continental slope west of the Bank. The combination of these habitats and their biological communities creates an area of high biological diversity in a relatively confined geographic area.

The unique quality of these habitats was recognized by the Council in 2006 when areas representing each of these habitats were identified as habitats worthy of additional protection under EFH Conservation Area designation. The substrate shallower than 50 fathoms on Cordell Bank was designated as Cordell Bank Conservation Area (50 fm (91 m) isobaths) and the use of bottom contact gear was prohibited. In addition, areas of the continental shelf and slope were designated as Cordell Bank/Biogenic Conservation Areas and the use of bottom trawls was prohibited. Since 2006, the sanctuary and partners have conducted several research cruises and published results from earlier work characterizing the ecological qualities and importance of these habitats. Many of these findings were submitted to the National Marine Fisheries Service in 2011 as part of their Groundfish EFH data call and are captured in the Council's September 2012 Phase I report. Among the findings:

- 1) Cordell Bank continues to be an important recruitment site for settling young of the year (YOY) rockfishes (*Sebastes* spp.). Observations from 2010



- indicate that the offshore location and depth of the Bank may provide favorable recruitment habitat for yelloweye rockfish (*S. ruberrimus*), in addition to several other rockfish species. Initial survey results show 2013 as another good recruitment year and we will be conducting additional surveys in the fall.
- 2) There are areas in the no bottom trawl Cordell Bank/Biogenic Conservation Area on the shelf, east of the Bank that support large stands of sea whips (*Halipteris californica*) that provide structure and habitat for other invertebrates and fishes.
  - 3) On the slope west of the Bank, outside of the Cordell Bank/Biogenic Conservation Area, condition of the habitat and the presence of a derelict trawl net and cables raised questions about the impact of bottom trawling on the substrate and corals. Work by partners inside the EFH Biogenic Conservation Area west of the Bank indicated that after three years of protection, abundance of epifaunal macro-invertebrates was significantly higher within the EFH area compared with sites outside the Conservation Area.

In summary, CBNMS finds that the EFH conservation measures currently in place are consistent with EFH provisions as outlined in the Magnuson-Stevens Act (MSA); and further finds that important EFH habitat is protected from adverse impacts from fishing in a practicable manner. We request that current protections remain in place. The EFH Conservation Areas in the sanctuary provide a continuity of protection that span habitat areas on the shelf, the Bank, and on the shelf and slope west of the Bank. This protection allows these benthic substrates and biological communities to develop in an undisturbed environment within the sanctuary.

We will continue to study areas inside and outside of the EFH Conservation Areas and work with our NOAA partners and others to better understand habitats and communities that are developing in these different environments, and their contribution to groundfish populations. If there are deliberations with the fishing community or others on how to improve the configuration of the EFH Conservation Area to facilitate management and fishing operations, we would be interested in participating in that conversation.

Thanks to the Council for its past actions to protect important habitats within CBNMS , and to Council staff and others for their hard work during the groundfish EFH review process. Please direct any future questions to me at [dan.howard@noaa.gov](mailto:dan.howard@noaa.gov) or 415-663-1456.

Sincerely,



Dan Howard  
Superintendent

Cc: Kerry Griffin

