



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL OCEAN SERVICE**  
**Office of National Marine Sanctuaries**

**West Coast Region**  
99 Pacific Street, Bldg 100, Suite F  
Monterey, CA 93940

July 31, 2013

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

Dear Chairman Wolford:

NOAA's Office of National Marine Sanctuaries (ONMS), West Coast Region submits the enclosed package of proposals and letters from the five national marine sanctuaries on the west coast in response to the request for proposals issued by the Pacific Fishery Management Council (Council) to modify essential fish habitat (EFH) designations of Pacific coast groundfish.

ONMS serves as trustee for the nation's system of marine protected areas. Through active research, management and public engagement, national marine sanctuaries sustain healthy environments that are the foundation for thriving communities and stable ocean-dependent economies. The primary objective of the National Marine Sanctuaries Act (NMSA) is resource protection of marine areas (Great Lakes included) of special national significance, including protection of biodiversity and ecosystem health. As such, protection of groundfish EFH from adverse impacts from fishing is aligned with sanctuary goals of protecting benthic habitat and associated communities and ecosystems.

As part of Amendment 19 to the Pacific Coast Groundfish Fishery Management Plan, in 2006 the Council and NOAA Fisheries implemented several EFH Conservation Areas that prohibit all bottom contact gear within the boundaries of Channel Islands, Monterey Bay and Cordell Bank national marine sanctuaries. ONMS applauds the Council for addressing sanctuary requests to implement fishing regulations that meet EFH provisions of the Magnuson-Stevens Act (MSA), while also addressing sanctuary goals. We find that these Council actions exemplify similarities in goals and purposes of the MSA and NMSA and hope that we can continue to collaborate to find opportunities of synergy in marine resource management. Furthermore, we appreciate Council staff have reached out to ONMS to offer sanctuary staff a seat on the EFH Review Committee (EFHRC) and Habitat Committee to foster meaningful collaborations.

The 5-year review of groundfish EFH offers an additional opportunity for collaboration in managing our nation's important resources. Staff from the five west coast sanctuaries have worked diligently to characterize the status of benthic habitat and EFH designations within sanctuary boundaries. At two national marine sanctuaries, Channel Islands and Cordell Bank, sanctuary managers are not proposing any changes to EFH designations. At the other three, sanctuary managers have collaborated earnestly with local partners to develop proposals that modify EFH designations within sanctuary boundaries. Because national marine sanctuaries are

responsive to local management conditions and community needs, each sanctuary submission should be viewed as a stand-alone proposal that is not linked to considerations in a proposal from another national marine sanctuary on the west coast.

We acknowledge that the package of sanctuary proposals and letters represent an initial consideration in what will subsequently be a multi-phased and public process with opportunities to deliberate about the trade-offs of particular boundary configurations for benthic habitat protection and access to valuable fishing grounds. To ensure appropriate and adequate input, we request the lead sanctuary staff (as indicated on the individual proposals and letters) are included during any future deliberations that may modify either the proposed actions as outlined in the sanctuary proposal, or the EFH Conservation Areas that prohibit all bottom contact gear within sanctuary boundaries.

If you or other Council members have any questions please direct them to my staff, Dr. Lisa Wooninck at [lisa.wooninck@noaa.gov](mailto:lisa.wooninck@noaa.gov). Thank you for consideration of national marine sanctuary proposals in the Council's 5-year review of groundfish EFH.

Sincerely,



William J. Douros  
Regional Director

Enclosures

Letters from:

Carol Bernthal, Olympic Coast National Marine Sanctuary  
Dan Howard, Cordell Bank National Marine Sanctaury  
Maria Brown, Gulf of the Farallones National Marine Sanctuary  
Paul Michel, Monterey Bay National Marine Sanctuary  
Chris Mobley, Channel Islands National Marine Sanctuary

Cc: Kerry Griffin