



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Greater Farallones National Marine Sanctuary

991 Marine Dr., The Presidio
San Francisco, CA 94129

Agenda Item F.4.b
Supplemental NMS Report
November 2016

November 14, 2016

Mr. Herb Pollard, Chair and Members of the Pacific Fishery Management Council
Submitted via email to: pfmc.comments@noaa.gov

**RE: Agenda Item F.4: Groundfish Essential Fish Habitat and Rockfish
Conservation Area Amendment 28 Alternatives**

Dear Chairman Pollard and members of the Pacific Fishery Management Council,

Greater Farallones National Marine Sanctuary (GFNMS) is providing the following information regarding the proposed EFH Conservation Area options at Rittenburg Bank.

Background

GFNMS proposed options to the Pacific Fishery Management Council (Council) in 2013 to modify Pacific Coast Groundfish Essential Fish Habitat (EFH) management measures, which included gear specific options for EFH Conservation Areas. These options reflected a review of new information regarding the three ecologically important habitat areas (*See Figure 1 on Next Page for the Map of these Areas*). We used the best available data at the time for each design.

Subsequently, a collaborative of fishermen and NGOs have put forth a new proposal that includes the three areas proposed by GFNMS, known as the Collaborative. Although GFNMS was not requested to be part of that collaborative process, we were able to provide feedback to some of the Collaborative-proposal designs and provided data and information when requested. We are appreciative of the opportunities we had to coordinate with the coast-wide collaborative. However, the timing of the feedback in particular for Rittenburg Bank was such that the window of opportunity to make changes had passed, and currently GFNMS cannot support the Collaborative-proposed design at Rittenburg Bank.

Alternatives

We would like the Council to consider the GFNMS option “Fanny Shoal to Rittenburg Bank” as part of the preferred alternative, as also proposed as part of the Oceana, et al. alternative (1.c) “Rittenburg Bank”. This is a 17 square mile area that encompasses all the known rocky habitat at the Bank as well as soft sediment that connects to the current Farallon Islands/Fanny Shoal EFH Conservation Area. It was designed to protect rocky geological features, and biogenic (coral and sponge) habitat, in an area where groundfish Fishery Management Plan species are known to occur, while allowing bottom trawling in soft substrate north, east, and west of Rittenburg Bank. It was also designed to encompass soft substrate and biogenic (pennatulid) habitat on the shelf in the southern portion of this design in an untrawled or lightly trawled area. Adopting this original Rittenburg Bank option proposed by GFNMS (incorporated in Alternative 1.c) will result in the

greatest conservation to this unique feature and is consistent with future research and monitoring plans in this region. See the purple shape labeled “Area 1” in *Figure 1*.

Although the Collaborative has proposed an area at Rittenburg Bank, the design missed the north-west corner of the Bank that includes rocky and mixed habitat adjacent to one of the highest concentrations of sponge habitat yet to be observed within GFNMS. Without inclusion of parts of these areas, we also believe that the Collaborative design risks the potential for trawlers to snag their gear in these habitats. (See “Areas of Concern” in *Figure 2*.)

In the spirit of continued collaboration, we are ready and willing to offer the Council other Rittenburg Bank design considerations that are within the range of the analyzed alternatives currently under review. A reoriented design that includes the area north and west of the Collaborative alternative (highlighted as “Areas of Concern” in *Figure 2*), as included in the GFNMS and Oceana et al. alternative could be a viable option. This reorientation could allow the area to be open between Rittenburg Bank and the current Farallon Islands/Fanny Shoal EFH Conservation Area, and at the same time meet the bulk of the habitat protections on the Bank and surrounding soft sediment.

FIGURE 1: GFNMS Original 2013 Proposed Options for EFH Conservation Areas off the Coast of Marin and San Francisco Counties

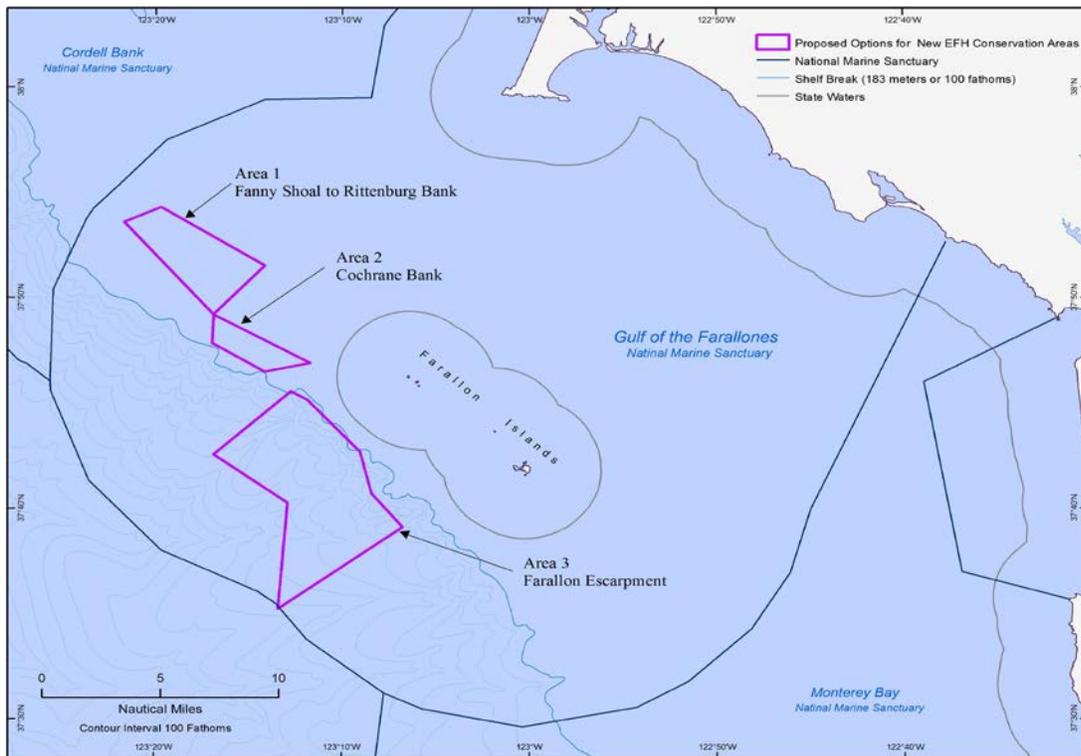
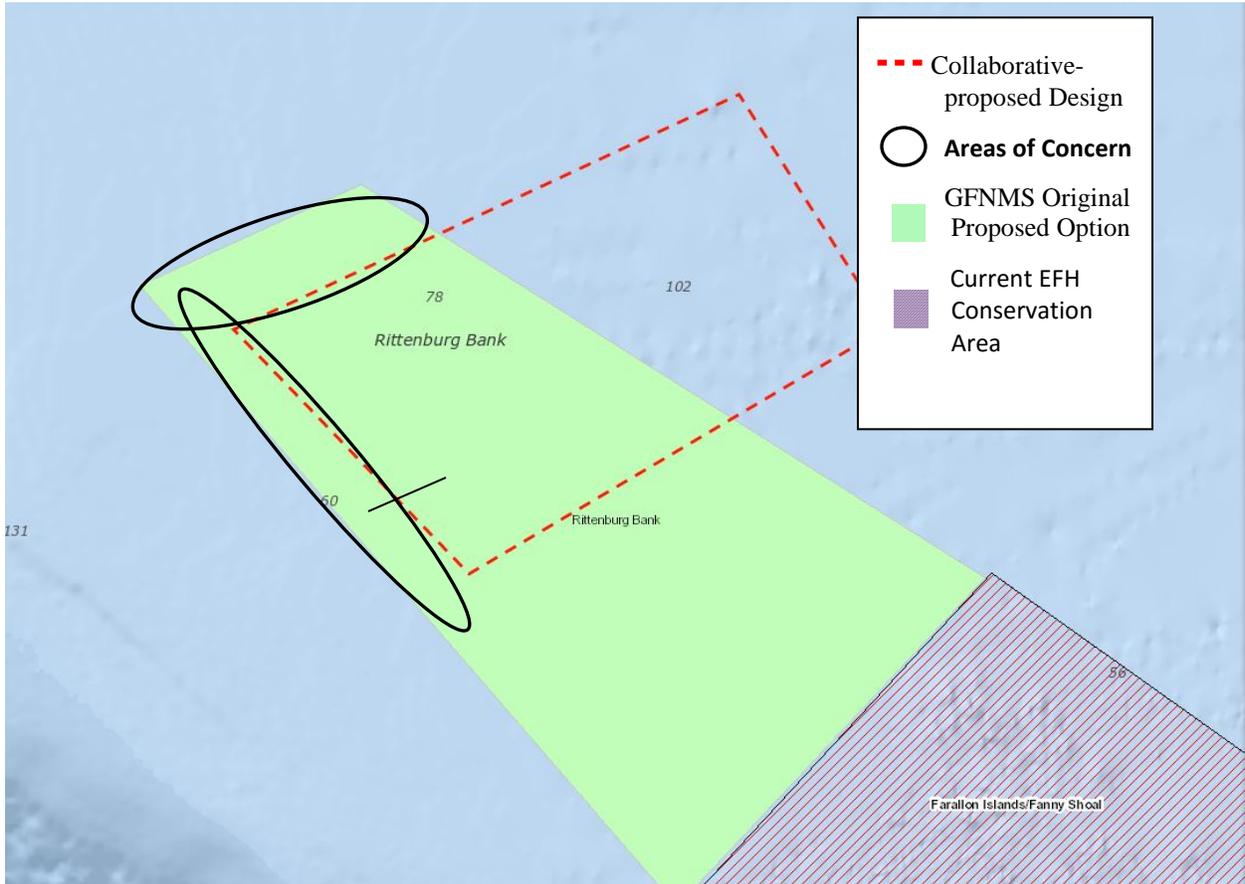


FIGURE 2: Areas of Concern, not included in the “Collaborative Alternative” at Rittenburg Bank.



Thank you for the opportunity to provide these additional comments and for considering the GFNMS original proposed design as part of the preferred alternative and/or the possible discussion for a new collaborative design approach at Rittenburg Bank.

Sincerely,

MARIA BROWN
Superintendent