

GROUND FISH ADVISORY SUBPANEL REPORT ON GREATER FARALLONES AND
MONTEREY BAY NATIONAL MARINE SANCTUARIES CORAL RESTORATION AND
RESEARCH PLAN – SCOPING

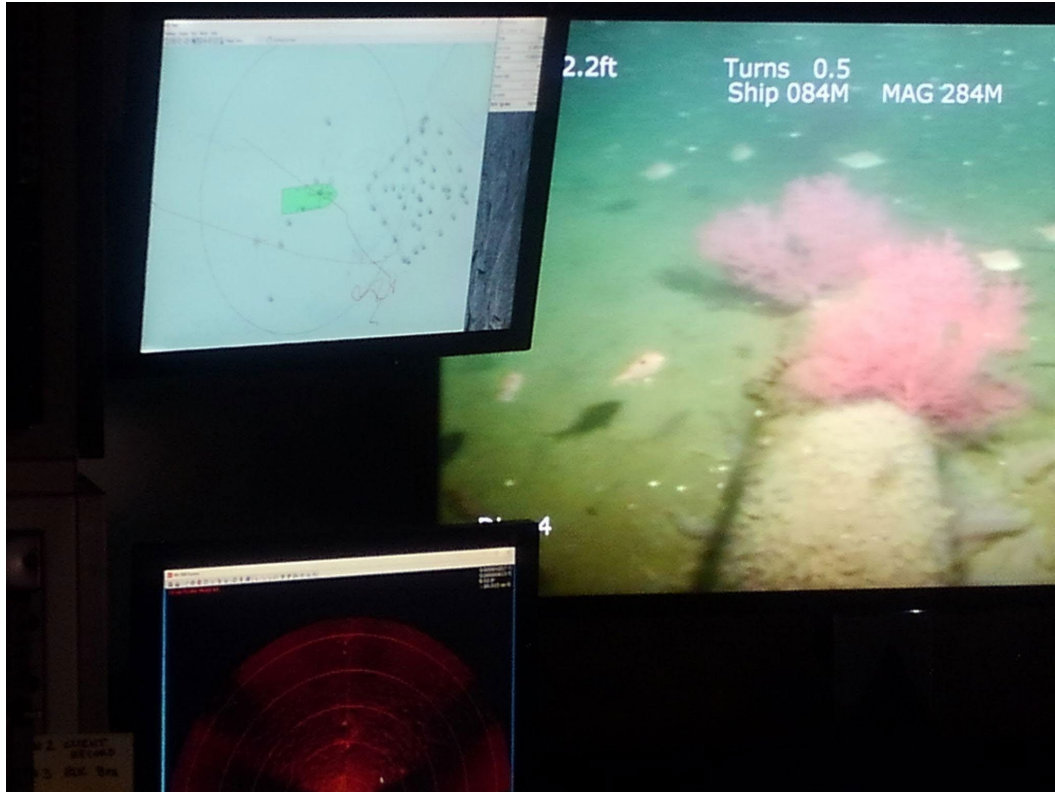
The Groundfish Advisory Subpanel (GAP) has considered the proposal of the Greater Farallones and Monterey Bay National Marine Sanctuaries (Sanctuaries) for coral restoration and research areas. We recognize Sanctuaries have pushed to reduce public access for fishing by proposing additional closed areas. We appreciate the geographic analysis and [Deep Sea Coral Research & Restoration Scoping Tool](#) the Sanctuaries have provided. **The GAP would like other Sanctuary proposals to continue to come through the Council process for review and comment.**

The GAP notes that the initial coral restoration proposal brought forward during the final action on the non-trawl area management measures action (Amendment 32) was tied to the YFD-70 Dry Dock [Draft Restoration Plan](#) due to the loss of the YFD-70 Dry Dock into Sanctuary waters. The Sanctuaries received \$8.7 million in settlement for damages for mitigation. As the coral restoration areas were not included in the final action for Amendment 32, the GAP notes that while the five areas of proposed plantings under this action have remained constant, the proposed locations have expanded beyond those “areas of interest” described in [Agenda Item F.4.a, Supplemental ONMS Report 1, March 2023](#). The goal has also expanded from just mitigation to “mitigation and long-term coral research.”

Pre-existing shipwrecks are seen as valued sanctuary resources. In fact, sanctuaries have been established expressly to protect shipwrecks from potential salvagers and souvenir seekers, such as the [Potomac River-Mallows Bay](#) and the [Monitor National Marine Sanctuary](#). Yet, the loss of any vessel into sanctuary waters is seen as damage, even in the absence of ancillary pollution. The potential for fines of this nature adds economic risk to mariners operating within sanctuary boundaries, discouraging public access for traditional uses and potentially increasing insurance costs for those who sail within them.

Within the marine environment, hard substrate – whether naturally occurring or anthropogenic – typically provides a haven for marine biota, increasing both local species diversity and biomass. This includes deep sea corals. Therefore, the **GAP suggests continued monitoring of the YFD-70 Dry Dock would provide valuable information** on the impacts of new wrecks in deep waters and document the composition, degree to which and speed at which marine life adapts to the new structure(s).

In addition, the GAP notes considerable conservation value could be garnered by providing the agencies that are tasked to enforce Sanctuary regulations with needed financial support, putting vessels and eyes on the waters to protect the public’s interest there.



DEEP-SEA CORALS colonize a pipeline off the Santa Barbara coast.



OPPORTUNISTIC REEF ECOSYSTEM on anthropogenic structure deployed in the 1980s.

The GAP suggests that any proposed Sanctuary areas on coral restoration or research not restrict or exclude any fishing currently allowed. The fishing community is already heavily regulated and looking at future limited fishing opportunities and does not want to be further restricted in these areas. Specifically, the fleet is experiencing – and will continue to experience – very constraining nearshore restrictions, making these offshore areas more valuable. We note bottom trawling is already excluded from these areas and deep-water corals on hard substrate have been documented at the proposed sites.

However, we do offer that the Ascension and Año Nuevo canyon areas and the Sur Ridge area may be the least impactful to fisheries and could be moved forward by the Council for consideration for the range of alternatives. The other areas have been continually fished for years and are too valuable to lose to any coral restoration project. In other words, these areas will become even more important as nearshore restrictions are proposed. Additionally, **if the Council moves forward with the proposal to develop new closed areas, the GAP suggests that only groundfish bottom contact gear (i.e. pots and longlines) be restricted** and non-bottom contact gear types (e.g, stationary vertical jig gear) should be permitted. Overall, we strongly suggest the project areas should encompass (in total) areas in size that are no more than the size of the YFD-70 Dry Dock itself, plus a no-bottom-contact buffer no greater than a quarter mile around them.

While the GAP offers the above comments and suggestions, unanswered questions remain, which make it difficult to comment in full. For example:

1. GAP members know that other bottom contact state fisheries exist in these proposed closed areas. Will these be considered through the state process?
2. How much area will be planted within the closed areas?

The GAP suggests the Sanctuaries should do a quantitative review of the program every five years to determine the effectiveness of the measures and to what degree. Furthermore, if they are not working, the areas should re-open to fishing.

PFMC
09/10/23