

RESOLUTION of the
Greater Farallones National Marine Sanctuary Advisory Council

Support Enhanced Protections for Cordell Bank's Benthic and Coral Habitats

At its meeting on October 31, 2024, the Greater Farallones National Marine Sanctuary (GFNMS) Advisory Council passed a resolution to send a joint letter (with the Cordell Bank National Marine Sanctuary Advisory Council (CBNMS)) expressing support for the resolution letter to support funding for Farallon Islands research and monitoring program and requested to send it to the GFNMS and CBNMS Superintendent, Maria Brown.

Attachments: Joint Proposed Resolution to Support Enhanced Protections for Cordell Bank's Benthic and Coral Habitats

This resolution was passed with majority vote by a quorum of primary members (or alternate members serving in place of primary members) at a public meeting on October 31, 2024 held virtually via GoToWebinar. Council discussion regarding this resolution can be found in Meeting Highlights documentation at https://farallones.noaa.gov/manage/sac_meetings.html.

The council is an advisory body to the sanctuary superintendent. The opinions and findings of this letter/publication do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration.

COVER LETTER

Support Enhanced Protections for Cordell Bank’s Benthic and Coral Habitats

October 31, 2024

Maria Brown,
Sanctuary Superintendent Dear Superintendent Brown,

By this letter, the Sanctuary Advisory Councils for Greater Farallones and Cordell Bank National Marine Sanctuaries are recommending that the Greater Farallones and Cordell Bank National Marine Sanctuaries (GFNMS/CBNMS) share the attached resolution with the West Coast Regional Office, the National Office of the National Marine Sanctuaries, the Pacific Fisheries Management Council, and the California Department of Fish and Wildlife for timely implementation.

Sincerely,



Jeff Dorman, Chair
CBNMS Advisory Council



Jaime Jahncke, Chair
GFNMS Advisory Council

PROPOSED RESOLUTION

Support Enhanced Protections for Cordell Bank's Benthic and Coral Habitats

The Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils have reviewed the California Department of Fish and Wildlife (CDFW) proposal, which describes changes to the Cordell Bank Groundfish Conservation Area (GCA). We are concerned that the removal of the 2004 boundary would threaten the fragile benthic habitat in the current GCA. Further, the CDFW proposal alone represents an insufficient range of alternative actions. We encourage the Pacific Fisheries Management Council to consider other alternatives that still serve the "Purpose and Needs" of this action while also recognizing the importance of maintaining Cordell Bank as an exceptional ocean area in need of lasting conservation.

Whereas protecting biodiversity and sensitive marine habitats is a priority for the National Oceanic and Atmospheric Administration (NOAA) and the Office of National Marine Sanctuaries (ONMS);

Whereas the Cordell Bank National Marine Sanctuary (CBNMS) was designated in 1989 and expanded in 2015 to protect 1,286 square miles of essential marine habitats off the northern California coast, which support rich biodiversity and critical ecosystems;

Whereas Cordell Bank is a biologically unique and highly productive rocky undersea feature that provides vital habitat for benthic organisms, including cold-water corals and sponges, which form the foundation of diverse marine communities;

Whereas the 2009-2021 CBNMS Condition Report found that habitat within CBNMS was in "fair" condition;

Whereas these coral and benthic habitats face increasing pressures from human activities, including bottom-contact fishing, marine debris, and climate-related impacts such as ocean acidification and warming, all of which threaten the resilience and ecological balance of these sensitive ecosystems;

Whereas bottom trawling and other forms of bottom-contact fishing disturb sediment, damage fragile coral structures, and degrade habitat quality, with recovery times for coral communities spanning decades to centuries;

Whereas marine debris, including lost, discarded or abandoned fishing gear, poses a persistent threat to benthic communities, entangling organisms, inhibiting coral growth, and altering habitat structures over extended periods;

Whereas the Magnuson-Stevens Fishery Conservation and Management Act mandates the Pacific Fishery Management Council (PFMC) and NOAA's National Marine Fisheries Service (NMFS) to prevent and minimize adverse impacts on Essential Fish Habitat (EFH), especially where fishing activities jeopardize the health of benthic organisms and their habitat;

Whereas NOAA's National Marine Sanctuaries Act requires sanctuary management to "maintain the natural biological communities in the national marine sanctuaries, and to protect, and where appropriate, restore and enhance natural habitats, populations, and ecological processes," facilitating use of resources with resource protection as the primary objective;

Whereas recent the Pacific Fisheries Management Council (PFMC) recently decided to open significant areas within the Cordell Bank National Marine Sanctuary to bottom-contact fishing and non-trawl commercial and recreational fishing, creating heightened risk for sensitive species and previously protected benthic habitats;

Whereas the California Department of Fish and Wildlife (CDFW) has proposed changes to the Cordell Bank Groundfish Conservation Area, potentially reducing protections for essential fish habitats and sensitive species, including yelloweye rockfish, that have benefited from these protections for over two decades;

Whereas preliminary survey data and information are insufficient to fully understand the potential impacts of the proposed regulatory changes on sensitive habitat areas and species within the sanctuary;

Whereas the Office of National Marine Sanctuaries provided the PFMC with a deep-sea coral research and restoration scoping document and accompanying geospatial tool to support enhanced protections and restoration measures for deep-sea coral ecosystems within Cordell Bank, yet recent PFMC decisions have limited the geographic scope of protections, excluding three critical proposed locations;

Whereas the Advisory Council for the Greater Farallones and Cordell Bank National Marine Sanctuaries and members of the public expressed significant concern over PFMC's September 11, 2023 decision to limit the range of alternatives for habitat protection, potentially endangering critical areas within the sanctuary;

Therefore, be it resolved that:

- 1) the Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils formally acknowledge the "purpose and need" of the Pacific Fisheries Management Council action to reduce unnecessary regulatory complexity and provide fishing access to previously closed areas surrounding Cordell Bank while protecting sensitive habitats. The Cordell Bank Groundfish Conservation Area (GCA) was initially implemented to reduce catch of several overfished groundfish stocks, which are all now rebuilt or rebuilding ahead of schedule.
- 2) the Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils formally requests that the Pacific Fisheries Management Council refrain from selecting a preferred proposal at this time and instead establish a collaborative working group with diverse stakeholders to identify a balanced approach that prioritizes both ecosystem protection and allowing fishing in appropriate areas;

- 3) the Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils hereby request durable long-lasting protections for critical deep-sea habitat within Cordell Bank National Marine Sanctuary, prioritizing areas at high risk of damage, with particular focus on sensitive, unique habitats that are slow to recover from disturbances.
- 4) the Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils urge the Pacific Fisheries Management Council to collaborate closely with Greater Farallones and Cordell Bank National Marine Sanctuary staff and utilize the full extent of sanctuary data to determine a range of scientifically sound alternatives that align with Cordell Bank National Marine Sanctuary's goals to protect and enhance the resilience of its unique and irreplaceable marine ecosystems.
- 5) the Advisory Councils of Greater Farallones and Cordell Bank National Marine Sanctuaries request the Sanctuary Superintendent to use the best science available to submit their own polygon alternative for consideration by the Pacific Fisheries Management Council that meets the "purpose and need" while protecting Cordell Bank and critical transitional habitat around the bank.
- 6) the Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils request the Pacific Fisheries Management Council engage with Sanctuary Advisory Councils in the early scoping phases of any future management changes in sanctuary waters to ensure comprehensive consideration of ecological and community priorities.
- 7) the Greater Farallones and Cordell Bank National Marine Sanctuary Advisory Councils requests the Pacific Fisheries Management Council recognizes the transitional habitat around the bank as a priority habitat for protection needed to reduce threats to deep-sea benthic and coral habitats within Cordell Bank National Marine Sanctuary, ensuring compliance with federal conservation mandates and a thorough environmental analysis.

By taking these steps, we can ensure the protection and sustainable management of the Greater Farallones and Cordell Bank National Marine Sanctuaries, contributing to the health and resilience of California's rich marine ecosystems and supporting balanced, long-term benefits for biodiversity and coastal communities.

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