Dept of Commerce / NOAA / NOS / (1) ocean & estuarine Mgmt Div.

Cordell Bank National Marine Sanctuary

Final Environmental Impact Statement / Management Plan

Volume Two

COASTAL ZONE
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U.S. Department of Commerce
National Oceanic and Atmospheric Administration
Marine and Estuarine Management Division

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COASTAL ZONE INFORMATION CENTER

VOLUME TWO

FINAL ENVIRONMENTAL IMPACT STATEMENT
Prepared on the Proposed
Cordell Bank National Marine Sanctuary

April 1989

U.S. Department of Commerce
National Oceanic and Atmospheric Administration
Office of Ocean and Coastal Resource Managment
Marine and Estuarine Management Division
1825 Connecticut Ave., N.W. Suite 714
Washington D.C. 20235

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This Volume includes the comments received on the Draft Environmental Impact Statement/Management Plan (DEIS/MP) prepared on the proposed Cordell Bank National Marine Sanctuary, and provides the National Oceanographic and Atmospheric Administration's (NOAA) responses to these comments. Generally, the responses to comments are provided in one or a combination of forms:

1. Expansion, clarification or revision of the DEIS/MP,

2. Generic Responses to comments raised by several reviewers, and/or

3. Brief responses to detailed comments received from each reviewer.

Written comments from individuals, organizations, State and local governments and Federal, State and local agencies are printed verbatim, and verbal comments, received at public hearings, have been summarized at the end of this volume.

Generally, the comments are printed on the left side of the page and NOAA's response is on the right side of the page. Comments requiring no response are printed on the right side of the page.

Ten general issues were raised frequently by reviewers of the DEIS/MP. The responses to these issues are presented below. Commenters will be referred to these generic responses in the text.

GENERIC COMMENTS

GENERIC COMMENT A:

The majority of commenters recommended the selection of boundary alternative #1, the largest boundary option (397.05 square nautical miles). It was felt that this larger boundary would protect a greater area of ecological significance and facilitate management and protection of the Sanctuary.

GENERIC RESPONSE A:

NOAA has adopted this recommendation. The larger boundary encompasses additional habitat utilized by marine mammals, seabirds for resting, feeding and migration. In addition, it provides a larger ecological buffer area for the unique concentration of resources found on and around Cordell Bank. The larger boundary also provides for a more easily managed area as it is contiguous to the Point Reyes-Farallon Islands National Marine Sanctuary.

The benthic resources, marine mammals and seabirds that are observed on and around Cordell Bank and on the adjacent continental shelf break were described in the DEIS/MP. The distribution of these organisms in the area surrounding the Bank provided the rationale for boundary alternative #2, a 101.10 square nautical mile area. However, information provided to NOAA during the DEIS/MP comment period and the results of recent research, sponsored by the Point Reyes-Farallon Islands National Marine Sanctuary, demonstrates substantial use by seabirds and marine mammals of the area encompassed by boundary alternative #1.

GENERIC COMMENT B:

A great majority of commenters expressed their support for a Sanctuary regulation prohibiting all hydrocarbon exploration and development activities within the boundary of the Sanctuary from the time of designation.

GENERIC RESPONSE B:

NOAA does not intend to prohibit hydrocarbon activities at this time. The Department of Interior's Outer Continental Shelf (OCS) Oil & Gas 5-Year Leasing Plan, the proposed Sanctuary regulatory and management framework, and existing Federal statutes presently provide adequate protection to the Sanctuary's resources.

The current OCS Oil & Gas 5-Year Leasing Plan excludes Cordell Bank within the 50 fathom contour. Thus, the core area of the Sanctuary is presently protected from hydrocarbon activities.

If areas within the Sanctuary are leased for hydrocarbon activities in the future, NOAA has authority to certify and condition or deny certification for, as necessary, permits or other authorizations granted to operators (lessees or contractors) by other authorities for activities within the Sanctuary which are otherwise prohibited. Such conditions may include, but are not limited to, the establishment of a monitoring program and scientific research studies to measure the effects of hydrocarbon activities on Sanctuary resources and the restriction of discharges. Any conditions imposed by NOAA on other authorities' permits will be made in consultation with those agencies and the permitees.

The existing Federal regulations provide additional protection to Cordell Bank. Environmental review and the opportunity for the public comment take place prior to any hydrocarbon production according to the provisions of the Outer Continental Shelf Lands Act and the National Environmental Policy Act. Further, OCS activities are subject to the provisions of the Endangered Species Act and the Marine Mammal Protection Act, which protect specific organisms.

Finally, NOAA has the ability to enact emergency regulations to prohibit hydrocarbon activities, or any other activities, in the Sanctuary to prevent immediate, serious and irreversible damage to a Sanctuary resource. Such emergency regulations shall remain in effect for no more than 120 days, during which time permanent regulations may be proposed by NOAA.

GENERIC COMMENT C:

Several commentors recommended that a proposed sewage outfall pipe from the City of Santa Rosa be prohibited as it was believed that discharges from the outfall could possibly impact the Sanctuary.

GENERIC RESPONSE C:

The City of Santa Rosa is considering several sites for the disposal of sewage effluent. Any sewage discharges would have to be permitted by the Environmental Protection Agency through the regulations which implement Section 402 of the Clean Water Act. In addition, under Sanctuary regulations, NOAA must certify permits from other authorities for activities which are prohibited by Sanctuary regulations and can require additional conditions (or deny certification) if necessary to protect Sanctuary resources. One potential site to the north of Bodega Head would be outside of the boundary of the proposed Sanctuary. However, discharges from such an outfall, which enter the Sanctuary and injure its resources, are prohibited under Sanctuary regulations.

The plans of the City of Santa Rosa for a sewage outfall pipe are still in the preliminary stages and the eventual disposal site and the nature of any discharges remain undecided. NOAA, as manager of the Point-Reyes Farallon Islands National Marine Sanctuary, is a member of the task force set up by the California Regional Water Control Board, to determine the optimal site and nature of the discharges.

GENERIC COMMENT D:

Many commentors recommended that anchoring on the ridges and peaks of Cordell Bank be banned to prevent damage to benthic organisms.

GENERIC RESPONSE D:

Anchoring on the Bank can injure or destroy the benthic organisms by physical impact and by dragging of the anchor chain. NOAA recognizes that this activity could have a significant effect on the benthic flora and fauna and should be carefully monitored. However, at present few vessels visit Cordell Bank and anchor on it.

However, regulation of anchoring has been added to the scope of potential regulations in the Designation Document (Article 4) and will be considered if anchoring activities increase and threaten the Bank's resources. This potential regulation would only apply to Cordell Bank and the area within the 50 fathom contour surrounding Cordell Bank.

GENERIC COMMENT E:

Some commenters were unclear as to whether the Sanctuary's regulations would apply only within the 50 fathom isobath surrounding Cordell Bank or throughout the entire Sanctuary. One commenter felt that all regulations should apply only within the 50 fathom isobath.

GENERIC RESPONSE E:

Article 4 of the Sanctuary Designation Document has been modified to eliminate ambiguities concerning the application of the Sanctuary's regulatory program. Five activities are potentially subject to regulation by designation of Cordell Bank as a National Marine Sanctuary. These include: depositing or discharging of materials or substances; removing, taking, or injuring or attempting to remove, take or injure benthic invertebrates or algae; hydrocarbon activities; anchoring; and removing, taking, or injuring or attempting to remove, take or injure historical or cultural resources.

At the time of designation, only the deposit or discharge of materials or substances, and removing, taking, or injuring or attempting to remove, take or injure benthic invertebrates or algae will be regulated. The prohibition against depositing or discharging will apply throughout the Sanctuary. In addition, such discharges beyond the boundary of the Sanctuary which enter the Sanctuary and injure its resources are prohibited. Prohibition of discharges or deposits beyond the 50 fathom isobath is necessary to protect those pelagic or migratory resources (including seabirds and marine mammals) which occur throughout the Sanctuary.

The prohibition against the taking of benthic invertebrates or algae shall apply only to the immediate vicinity of the Bank; within the 50 fathom isobath. Prohibition within this discrete area is deemed sufficient to protect the Bank's unique benthic resources found on the submerged seamount. This regulation does not restrict commercial or recreational fishing activities. The accidental taking of invertebrates or algae during normal fishing operations would not be in violation of this prohibition.

If it is necessary to prohibit hydrocarbon activities in the future to protect the Sanctuary's resources, this restriction will apply throughout the Sanctuary. The potential damage to resources from hydrocarbon activities would extend to those pelagic and migratory resources occurring on and beyond the Bank itself. Any hydrocarbon exploration or development activity will be monitored to determine the effect on Sanctuary resources.

If it is necessary to regulate anchoring in the future to prevent damage to the Bank's resources because of increased use, such regulation will apply to Cordell Bank and the area within the 50 fathom isobath surrounding Cordell Bank. It is in this area where the benthic resources are most concentrated and potentially susceptible to anchor damage.

If it is necessary to regulate the taking of historical or cultural resources, such a prohibition will apply throughout the Sanctuary.

GENERIC COMMENT F:

A commentor stated that the regulation prohibiting discharge and deposit of material in the Sanctuary was an unnecessary layer of additional regulation onto existing ones. It was stated that with the exception of solid wastes the discharge of materials or substances was covered by existing laws and regulations.

GENERIC RESPONSE F:

The regulation prohibiting discharges and deposits within the Sanctuary complements the existing regulatory system, enhances the area's overall recreational and aesthetic appeal, and helps maintain the present water quality in the Sanctuary. Numerous laws and regulations apply to the disposal of waste in the marine environment. However, most decisions are made on a case-by-case basis, which provides less certainty of protection than would the designation of a no discharge area which protects the complete Sanctuary habitat.

The CWA provides for a maximum penalty of $10,000 for a single discharge incident without the initiation of a civil action. This does not provide sufficient deterrent for protecting important Sanctuary resources; $50,000 is the maximum penalty allowed under Sanctuary regulations.

Certain gaps exist in the regulatory framework. The discharge of oil and other hazardous substances in the territorial sea is subject to Environmental Protection Agency (EPA) requirements under the Clean Water Act (CWA) and U.S. Army Corps of Engineers (COE) requirements under the Rivers and Harbors Act (for discharges that might obstruct navigation). These statutes are designed to protect marine resources, but do not generally provide for comprehensive protection of a marine area and do not specifically prevent certain activities that may harm the resources of the Sanctuary, such as overboard disposal of trash from ships.

Beyond the territorial sea, EPA approval is needed for ocean dumping and for any location of a new ocean outfall. EPA regulations take the ecological productivity and sensitivity of an area into consideration. However, such regulations to not guarantee that EPA will prohibit the disposal of waste in the Sanctuary. Specifically, the provisions of the CWA do not apply to discharges of non-biodegradable solid wastes as casual litter. The Sanctuary's prohibition is designed specifically to protect the area's important living resources from the effects of all harmful effluent and solid wastes and to facilitate the recovery of damages caused by discharges which injure those resources. In addition, it prevents floating or submerged waste debris (e.g., non-biodegradable plastics) from being deposited in areas where animals could eat or become entangled in the debris, possibly leading to illness or death. Finally, the deposit of non-biodegradable litter reduces the aesthetic qualities of the Bank and thereby detracts from its recreational value.

GENERIC COMMENT G:

Concern was expressed that the DEIS/MP Santuary proposal does not provide enough personnel, equipment and financial resources, for comprehensive management of the Cordell Bank National Marine Sanctuary. It was stated that there should be an increase in staff and funding with recommendations for a Sanctuary Headquarters office at Bodega Bay or Point Reyes. This proposed Headquarters should also include increased enforcement capability and an oil-spill recovery unit. An increase in management personnel was also believed necessary to conduct long-term monitoring, research and surveillance and enforcement activities.

GENERIC RESPONSE G:

Projected staff, equipment and facilities needs, described in the DEIS/MP, are believed to be sufficient to meet existing Sanctuary management needs. The budget for Sanctuary management will be based on available resources and more solid assessments of monitoring requirements. The Point Reyes-Farallon Islands National Marine Sanctuary management staff will continue to use its patrol-vessel for resource protection in the Cordell Bank National Marine Sanctuary. Resource protection, as described in the DEIS/MP, will include coverage by Sanctuary wardens who will expand their present coverage of the The Point Reyes-Farallon Islands National Marine Sanctuary to include Cordell Bank. In addition, the routine air and sea patrols of the United States Coast Guard and the California Department of Fish and Game will assist with surveillance and enforcement activities.

Any necessary oil-clean up activities are managed by the United States Coast Guard, which directs the National Response Team under guidance provided by the National Contingency Plan. Oil spill clean-up and recovery equipment includes that of an oil industry consortium, "Clean Bay", and U.S. Navy oil "skimmer" vessels based in San Francisco. The San Francisco Bay area presently requires this equipment to respond to emergencies there. However if hydrocarbon development does occur in or around the Sanctuary it is likely that the oil industry will station oil spill clean-up equipment in the Bodega Bay area.

GENERIC COMMENT H:

NOAA should consider provisions to increase shipping safety in the area. Such plans should include deployment of special buoys, communication systems and redirection of vessel traffic to prevent collisions and possible spills of hazardous materials.

GENERIC RESPONSE H:

NOAA agrees that it is preferable to prevent vessel accidents as well as prepare contingency and emergency plans in case of vessel collisions and accidental discharges. NOAA has determined that existing shipping safety regulations are adequate and that no further action is necessary. The United States Coast Guard (USCG) has jurisdiction over shipping safety in U.S. waters and NOAA has kept in close communication with this agency regarding shipping safety. The USCG has determined that the existing regulations and Traffic Separation Scheme (TSS) are adequate for the number of vessels using the San Francisco Bay port approaches in the area around Cordell Bank. This determination is based on a completed Port Access Route Study and an estimation by the USCG, that although compliance is voluntary, virtually all traffic complies with the TSS.

The Coast Guard has also initiated the Offshore Vessel Movement Reporting System (OVRMS), an advisory service to inform mariners of the location and movements of large vessels, such as oil tankers, in the ocean approaches to San Francisco Bay, including areas east of Cordell Bank. Participation by mariners is voluntary but by monitoring the radio transmissions of vessels, close encounters and possible collisions between ships may be avoided. NOAA will continue to cooperate with the Coast Guard in enforcement and surveillance procedures that relate to shipping within Sanctuary waters.

It is important to note that under International Law, foreign flag vessels in waters beyond the limits of the U.S. territorial sea, such as around Cordell Bank, cannot be regulated directly by NOAA or the USCG. Under international law, any regulation of navigation on the high seas must be endorsed by the International Maritime Organization in order for it to apply to foreign flag traffic. Finally, the National Marine Sanctuary Program has prepared a National Computerized Contingency and Emergency Response Plan, which can focus on individual Sanctuaries such as Cordell Bank. The plan details alert procedures and responses and describes Sanctuary resources at risk. The plan will be expanded to include Cordell Bank.

GENERIC COMMENT I:

There was disagreement on the need and extent of possible regulation of fishing activities. There were statements made that overfishing had already occurred and that "abnormal" fishing activities should be banned. In contrast, NOAA also received comments that asked for confirmation that commercial and recreational fishing will be excluded from the scope of Sanctuary regulations.

GENERIC RESPONSE I:

NOAA reaffirms that no regulation of fishing, other than by existing State and Federal statutes, will occur with the designation of the Cordell Bank as a National Marine Sanctuary. Fishing vessels, however, must comply with the Sanctuary's regulatory prohibition on discharges. All State and Federal regulatory programs pertain to fishing, including Fishery Management Plans promulgated under the Magnuson Fishery Conservation and Management Act, will remain in effect.

Sanctuary wardens will enforce the California Department of Fish and Game Code (and Chapter 14 of the California Administrative Code), which regulates and manages a wide variety of activities affecting the living marine resources found in the territorial sea and in the 200-mile wide exclusive economic zone. In addition, NOAA will continue to monitor the status of fishery resources around Cordell Bank.

GENERIC COMMENT J:

Comments were received that requested NOAA protect any historical or cultural artifacts that may be found within the Sanctuary.

GENERIC RESPONSE J:

NOAA agrees that it is necessary to protect and manage any historical and cultural artifacts that may be in the Sanctuary. At present, NOAA is unaware of any historical or cultural resources on Cordell Bank. NOAA recognizes that the lack of information does not mean that such resources are not present. Therefore, a prohibition on the removing, taking, or injuring or attempting to remove, take or injure cultural or historical resources has been added to the scope of activities potentially subject to regulation.

INDIVIDUAL COMMENTS

I 1.

F32 6th Avenue #11
Oakland, Calif
94606,
(415) 893 4362.

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY

Dr Mr William [illegible] 9 AM 11: 27

I am writing to you to urge you to acknowledge the importance of Cordell Bank, 20 miles west of Point Reyes, California. It is the important home of a large variety of Marine mammals and plant life as well as over 40 species of Marine birds.

The bank must become a completely protected sanctuary in order for it to continue to support this life.

It doesn't simply need protecting for the next five years, it needs protection for permanently.

Please examine the welfare of Cordell Bank, and the marine life there, deeply and seriously.

I look forward to your reply —

Sue Larkin - Antler.

No Response Necessary

8 October 1987

Re: CORDELL BANK

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Management
National Ocean Service, NOAA
1825 Connecticut Avenue,N.W.
Washington, D.C., 20235

Dear Ms Allin

I write to you on the subject of the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary. Cordell Bank is an undersa elevation which, because of a combination of oceanic conditions and undersea topography provides a biologically rich area with clearly defined boundaries. Adding to these qualities, the upwelling currents, and the Western Coast has a very special place which supports a wide variety of sea birds, fish, and marine mammals, as well as almost 300 identified types of plants.

1 Of the alternatives available, I firmly support Alternaive # 2; boundary alternative # 2, to designate this sanctuary and its vulnerable marine situation.

2 It is, of course, of crucial importance that oil and gas exploration and development be prohibited in this sanctuary.

I plead with you and the Office of Ocean and Coastal Management to take advantage of this marvelous opportunity to protect the Cordell Bank as a Marine Sanctuary.

Sincerely and respectfully,

Anne Baeck

Anne Baeck
441 Boynton Avenue
Berkeley, CA. 94707

1. See Generic Response A.

2. See Generic Response B.

cc:

Mr. Edward Wilczynski, Acting Chief
Ecology and Conservation Division, Room 6814
U.S. Department of Commerce
Washington, D.C. 20230

The Honorable C. William Verity Jr.
Secretary of Commerce
U.S.Department of Commerce
Washington, D.C. 20230

Senator Alan Cranston
Senate Office Building
Washington, D.C.,20510

Senator Pete Wilson
Senate Office Building
Washington, D.C., 20510

Congressman Ronald Dellums
House Office Building
Washington, D.C., 20515

8 Oct '87

Dear Ms Allin,

I understand that you are in the process of receiving public comment on the proposed Cordell Bank National Marine Sanctuary. I would like to make a comment, particularly as it pertains to the proposed boundary options and permitting oil/gas exploration and development within the Sanctuary. My field of expertise is with marine mammals, particularly cetaceans. As a result of studies I've been involved with this year and last year, I've come to consider that Cordell Bank itself is only a small part of the area in which these animals forage for their livlihood - the majority of their feeding efforts are in areas of upwelling around Cordell Bank, off Point Reyes, and along the scarps of Bodega Canyon and the tongue of 100 + fathom water a few miles Northeast of Cordell Bank (See attached sketch). The prey species for humpback and blue whales in these areas during our studies appear to be preponderantly euphausiids, although euphausiids, anchovies, and other fish species have been recorded from stomach contents of whales taken in this area during a commercial whaling episode from the mid-fifties to the mid-sixties in this century. This region from the Farallon Islands to Bodega Canyon, in particular, is precious and perhaps essential to the central California birds of humpback and blue whales, and seems to me to represent the minimum region one would define as meaningful "Sanctuary" for these species and other marine life we would like

to have remain a viable part of the ecosystem.

1 I strongly recommend the largest sanctuary alternative available to you, ie #1 or greater.

With respect to oil and gas exploration and development within National Marine Sanctuaries I submit that such activities violate the concept of Sanctuary by virtue of their disturbance damage, and potential for ecological disaster. It is known that seismic exploration activities kill great quantities of larval fishes, disturb all cetaceans and many larger vertebrates, and affect their distribution (negatively). In the situation where extensive areas of coastal waters are explored and developed for oil and gas, Sanctuary from such activities takes meaning and offers objective opportunity to evaluate their effects on the distribution of of creatures of the sea. I strongly recommend

2 that you do not permit oil/gas exploration and development in whatever Sanctuary is designated.

Yours Sincerely,

Ken Balcomb

Research Biologist

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of providing the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Janice A. Banta

JANICE BANTA
LARKSPUR, CA

October 5, 1987

Vickie Allin
Marine and Estuarine Management Division
OCRM, National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Vickie:

I support the proposed Cordell Bank National Marine *Sanctuary. Please help support it.*

1 Please support "Boundary Alternative #1" to give the broadest area of protection.

1. See Generic Response A.

2 Please ban OCS oil and gas leasing, exploration and development for the Cordell Bank area and all of our coastal areas.

2. See Generic Response B.

Thank you for your help and support in protecting and preserving our beautiful natural resources.

Sincerely,

Harvey E. Bell, Jr.
700 Lindsay Avenue
Rohnert Park, CA 94928

Lisa Brown
1016 3rd St #3
Novato Ca. 94945

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Lisa Brown

Lisa Brown
Novato Ca

1. See Generic Response A.

2. See Generic Response B.

PHIL BROWN
20 MEADOW DR
SAN RAFAEL CA 94903

Ms. Allin,

1 I am writing this letter to you in regards to the designation of Cordell Banks, CA, as a National Marine Sanctusry. I feel that it is imperative that the area boundary #1 be established for the protection of this very unique and pristine area. I wish to express my adamant desire the the entire area have a ban on all hydrocarbon activity. I cannot emphasize enough the importance of the ban. One only needs to see some of the photographs and video of the underwater area to see how fragile this area is, and see how detrimental to the area that would be possible should hydrocarbon activity be allowed. I must insist that as a concerned American citizen, this area receive the entire support you can give it in this direction. I will do everything in my power to see that this area be protected. A great number of my friends and relatives feel the same way.

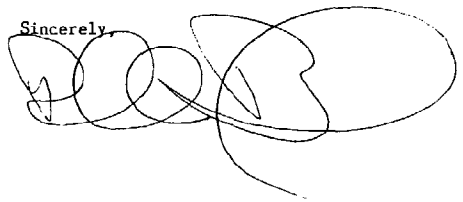
2

3 We completely support the Area Designation Boundary No. 1, and a ban on all hydrocarbon activity, and further request that additional funds for on site monitoring, and that provisions for enforcing the regulations

4 be ammended to include a ban on all contact with the shallow ridges (such as anchoring). We will do all that we can to fight for these recommendations and additional funding as necessary to preserve this beautiful area.

Thank you.

Sincerely,



1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response G.

4. See Generic Response D.

4101 Lincoln Way #101
San Francisco, Ca. 94122
October 7, 1987

Ms. Vicki Allin, Acting Chief
Marine & Esturine Management Division
Office of Ocean & Coastal Resource Mgmt.
National Ocean Service/NOAA
Washington D.C. 20235

Dear Ms. Allin,

I am writing in response to the Draft EIS and Draft Designation Document for the Cordell Bank National Marine Sanctuary proposal. I am a wildlife biologist and have spent many years working and recreating in the natural world. I am currently a wetland specialist.

One of my most awesome experiences in nature was a pelagic trip I took out to the Cordell Banks to observe whales, seabirds and other sea life. For hours we observed humpback whales feeding on the rich invertebrate life; we watched from a distance of one hundred feet as a blue whale filtered these marine organisms at the surface. This area is truely a national treasure which should be protected. My observations of the huge impact and encroachment human activity has on the natural environment in the Bay Area if unchecked, show that these areas must be protected by formal designation.

1 2 For this reason I strongly support the designation for a Cordell Bank National Marine Sanctuary, specifically Alternative #2; Boundary Alternative #2. I also urge the ban on offshore oil and gas exploration and development be extended to the whole boundary of the Sanctuary.

Sincerely,

Joelle Buffa

Joelle Buffa

1. See Generic Response A.

2. See Generic Response B.

October 9, 1987

Re: Cordell Bank draft EIS, management plan, and rule for Nat'l Marine Sanctuary

Ms. Vickie Allin
Acting Chief, Marine and Estuarine
Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin,

1 We strongly support the designation of Cordell Bank as a National Marine Sanctuary, and urge the adoption of Boundary Alternative #2.

2 In order to protect the ecological and bio-economic values of the area, we urge that strong prohibitions against oil and gas exploration and development in the area be established as well.

Sincerely,

Robert D. and Judith S. Burness
Box 482
Inverness, CA 94937

cc: Edward Wilczynski, Dept. of Commerce
Secretary William Verity, Sec'y of Commerce
Senator Alan Cranston
Senator Pete Wilson
Representative Barbara Boxer

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Joan E. Capurro

Joan E. Capurro
SAN ANSELMO, CA

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Robert S. Caparro

Robert Caparro
SAN ANSELMO, CA

1. See Generic Response A.

2. See Generic Response B.

Dear Sirs. 10/1/87

I am writing in favor of including Cordell Bank in the proposed National marine Sanctuary. I have been aware of the area and it would be a sin to let that area be destroyed by Offshore oil or any other destructive cause.

Please take this letter into your thoughtful consideration.

Thank you,

Signe Christensen
Concerned citizen +
Scuba diver.

1025 Galvin St
Calumet, Ca
94602

No Response Necessary.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Stephanie Y. Coleman

Stephanie Coleman
SAN RAFAEL, CA

1. See Generic Response A.

2. See Generic Response B.

94 Crest Road
Novato, California 94945

Ms. Vickie Allin
Acting Chief, Marine and Estuarine Management Division
OCRM, National Ocean Service/NOAA
1825 Connecticut Avenue, N. W.
Washington, D. C. 20235

October 7, 1987

Dear Ms. Allin,

My colleague and I are writing to support the creation of a Cordell Bank National Marine Sanctuary west of Pt. Reyes, California. We include comments on the DEIS/Management Plan. We wish to especially urge the creation of a Sanctuary based on Boundary Alternative 1, which excludes all offshore hydrocarbon activities.

1
2

We were not able to attend the hearings in California, but would have presented the following information supporting our conclusion that Boundary Alternative 1 provides a minimum large, critical area of protection for the unique and endangered species of this unusual location, and that offshore oil and gas development-related activities should be excluded from within the Sanctuary boundaries. The "preferred alternative" (Alternative 2) is not adequate to protect the resources for which the Sanctuary is being established, and offshore operations on or in the region adjacent to the Bank would directly conflict with the Sanctuary's purpose.

One of the most compelling reasons for both the large size and the oil exclusion requirements for an adequate Sanctuary, is the remarkable habitat for great whales that appears to be provided by the Bank and its vicinity. We are indeed fortunate that the Gulf of the Farallons provides a protected area for these remnants of the great whale populations. Cordell Bank is the prime spot for seeing Great Blue Whales and Humpbacks. It is accessible by boat for viewing and enjoyment and for scientific study. More importantly, it is an area where the animals can live safely, helping support any increase in numbers that are necessary for these species to survive.

The DEIS/MP does not, in the few paragraphs of its information about whales (pp.26-7), put their situation in perspective. From the hundreds of thousands that may have once existed in the North Pacific, population estimates now are a few thousand at most, for both the Great Blue Whales and for the Humpbacks. But the numbers are not certain. There may be as few as 1200 Blue Whales, 3000 Humpbacks. We have no idea of the critical size or limited distribution patterns of the populations beyond which they might not recover, making the locations where they are known to be concentrated even more important.

1. See Generic Response A.

2. See Generic Response B.

Recent research indicates that we may have a resident summer population of Great Blue Whales as well as Humpback Whales in the vicinity of the Bank. Since this is an area where individuals have been observed to feed (DEIS p. 26), and these whales are portions of a depleted species, it would seem that Cordell Bank provides a critical habitat area for these two endangered species.

3 No information was provided as to great whale sightings in the vicinity of the Bank region, especially in the region between Bodega Head and the Bank. This information is needed to place the need for a larger protection area in perspective.

4 The DEIS, p. 65, takes a position against Boundary Alternative 1 because "marine mammals are already protected under the provisions of the Marine Mammal Protection Act and there is no evidence that they are particularly attracted to the entirety of this area any more than to other areas. There is, therefore, no need to protect all of these waters as a habitat upon which marine mammals depend." It also states on p. 70 regarding Alternative 2, "Because marine mammals are attracted to Cordell Bank waters by the same food resources that attract seabirds, it can be assumed that this alternative encompasses the core area in which marine mammals feed."

However, actual research on these populations and their behaviors has only just begun, aimed primarily at the Humpbacks. Very little is known about the needs and behavior of the Great Blue Whale. We know the whales do not stay just over the Bank, but can be seen elsewhere. Sightings from Oceanic Society vessels which one of us reported in previous testimony placed great whales, including Blue Whales, in the region between Bodega Head and Cordell Bank as well as in the vicinity of the Bank. The assumption of a 'core area' above the Bank illustrates primarily our present lack of knowledge about the importance of the surrounding region.

Moreover, the idea of protecting just a core area rejects the ecological reality of the interconnectedness of oceanic systems. The food resources on the Bank are dependent on the nutrients and clean waters of the surrounding region. An oil spill, or the chronic industrial pollution of nearby waters, will not respect the boundaries of a 'core area'. For realistic protection, a large buffer zone is needed which excludes as much of the possibility of oil development as possible. The buffer should ideally be extended to the north 20 or 30 miles to provide a day or so of response time from spills in regions that may be developed to the north.

5 The areas of oil leasing proposals in the vicinity are not illustrated in the DEIS/MP, but should be. Although Cordell Bank is excluded from the current 5-year plan for offshore oil leasing, areas adjacent to it are not. Some of this area, known to contain tracts of high industry interest, would be protected from development under

3. It was our intention in the DEIS/MP to outline the value of all living resources in the vicinity of Cordell Bank. The species and patterns of fish, benthic organisms and sea birds, (as well as whales), were described so that a reviewer of the DEIS/MP would gain a perspective of the biological diversity and abundance of all natural resources on the bank.

   Marine mammals are a significant resource and NOAA recognizes the importance of detailed investigations into their abundance, distribution and behavior. Cordell Bank is especially important in this regard as a habitat for marine mammals. NOAA is aware of the numerous sightings of marine mammals in this area and how their abundance changes both annually and seasonally. However, many questions remain regarding individual behavior patterns and fine scale distribution patterns around Cordell Bank. NOAA, through the Point Reyes-Farallon Islands National Marine Sanctuary, has supported research over the past three years to investigate the distribution and abundance of humpback and blue whales as well as opportunistic sightings of other marine mammals. Aerial and vessel-based survey methods were able to identify individual humpback whales. This research has provided a thorough baseline characterization and suggests that a local, "resident" population of 88 humpback whales exists in the Point Reyes-Farallones National Marine Sanctuary and adjacent region.

4. See Generic Response A.

5. A map has been added that illustrates the extent of the area for potential oil exploration and development activity. See Generic Response B.

Boundary Alternative 1.

The threat of spills from vessel traffic is already very real, and many of the damages are visible and well-known. The Sanctuary should protect the resources from the less public additional threats from offshore industrial development. Such development should appropriately be precluded in this area of biological treasures.

The more we learn of the impacts of offshore oil development, from the initial seismic surveys, to exploration and development discharges of drilling muds, formation waters, and other toxic substances, to the small chronic spills and ever-present risk of a large spill, the more it seems wise to limit any development in the vicinity of critical marine resources.

6

No mention is made in the discussion of hydrocarbon development activies, pp. 81-86, of the extensive seismic survey operations that begin and accompany offshore exploration and development. Disruptive impacts of such surveys could occur to Cordell Bank species, and to eggs and larvae in the plankton and other organisms in the water column which provide food for the larger species in the Sanctuary area.

7

With respect to the discussion of drilling cuttings and mud impacts beginning on p. 81, please note that the total effects of drilling fluids have generally been underassessed, and that effects may occur at much greater distances than the immediate discharge site.

Specifically, the Marine Board study of 1983 cited on p. 82 is not the 'state-of-the-art' document adequate to draw conclusions of the impacts from full-scale development (as we hoped it would be). The studies considered only the quantities from exploratory drilling or from a few development wells, not the tons of cuttings and fluids from large, multi-welled operations we see on the West Coast.

The many specific components of the fluids used in various studies reviewed were not reliably known. The report relied on short-term (96 hour) laboratory studies of a limited number of species, and emphasized in its summary the "incomplete understanding of basic oceanic or biological processes" (as cited, p. 1). There were many cogent critiques of the panel's politics, data, methods of drawing conclusions, and the conclusions themselves. We call your attention to the review "The National Research Council's Report on Drilling Muds: Science Gone Awry?" by Brandt Mannchen, Sierra Club, Texas.

None of the drilling muds impact summaries look at the variation in organisms or regions, the cumulative effects of many point sources in one area, or the low-level or long term effects. They do not add the toxicity of the cuttings, or of the large discharges of formation waters, which contain heavy metals and carcinogens. The effects could easily be loss of several sensitive

6. The provisions of the Marine Mammal Protection Act of 1972 and the Endangered Species Act prohibit the taking of marine mammals and endangered species, respectively, with limited exception. Taking is defined under both acts to include harassment. If seismic activities have no more than a negligible impact on the species then taking is permitted under Section 101(a)(5) of the MMPA. The potential impact of seismic surveys will be monitored by the Sanctuary staff to determine if the resources of Sanctuary are jeopardized or threatened by the seismic activities.

7. EPA published an "Assessment of Environmental Fate and Effects of Discharges from Offshore Oil and Gas Operations (1985) that describes in detail the different components of the drilling fluids, cuttings and discharged water. However, our understanding of the environmental transport fate and toxicity of these components is still not fully understood. Environmental factors that affect the dispersion and transport of discharged material include waves, current direction and velocity and bottom topogaphy. The environmental effects of the drilling materials and fluids are therefore very difficult to predict. NOAA has prohibited all discharges and depositing of harmful substances that enter the Sanctuary and injure Sanctuary resources. NOAA will continue to monitor the Sanctuary resources and the activities that could potentially injure those resources.

benthic species in an exposed area, and impacts on up the food chain.

Even at highly dilute levels, drilling mud benthic deposits or plumes may have critical effects on marine species. For example, very low levels of drilling fluid suspensions were found by UC Santa Barbara Marine Institute scientists to disrupt abalone larvae settling behavior and other behavior of invertebrate organisms, as reported at EPA Region IX hearings on the Draft NPDES Permit for offshore operation discharges, October 1985.

8

The biota of the Bank region below 35 fathoms, although not as dense as that on the Bank itself, contributes to the food availability, and would contribute to its loss or contamination if affected. A prohibition of drilling to just beyond 50 fathoms would not prevent that loss or contamination from reaching either the 'core area' or the organisms further up the food chain that the Sanctuary would protect.

Realistic distances for protection must be established based on further research. What little is reported is suggestive that distances presently assumed safe are too little. George Mariani in the Lake Buena Vista Symposium proceedings, p. 496, replied to a question how far out during the Baltimore Canyon drilling muds study statistically significant elevations of levels of compounds were found. "Two miles and that was the maximum distance for which we sampled. In that case it was observed for lead."

9

Jack H. Thompson, Jr., stated in the abstract of his doctoral dissertation that concentrations calculated for plumes at more than 12 kilometers from the source would with some muds get behavioral responses in some species of reef corals (Responses of Selected Scleractinian Corals to Drilling Fluids Used in the Marine Environment, Texas A&M, August 1980). With a rare hydrocoral and its dependent species to protect on Cordell Bank, the prohibition of drilling operations for a number of miles would be appropriate.

It is not sufficient to state (p. 82) "Department of Interior OCS Ordeer Number 7 forbids the discharge of drilling muds containing toxic substances into ocean waters," and expect that we can assume therefore that no toxics will be discharged. Please study the NPDES hearing records for 1) the actual history of toxic discharges and violations of regulations, and 2) the controversy over the adequacy of the regulations, even assuming excellent compliance, to protect marine organisms.

A ban on hydrocarbon activities in the adjacent Gulf of the Farallons Marine Sanctuary was upheld by the findings of a 1982 study whose conclusions also apply to the Cordell Bank. The oil that might be forgone would be a very small fraction of that available for our needs. The risks to the resources are significant, and the resources are unique and some are endangered. We will likely be able to develop

8. See Generic Response E.

9. See Above. Response No. 7.

that oil more safely in the future, and it will be there for us.

****

One of us has been priviledged to see several of the endangered Humpback Whales in the vicinity of the Bank, and it has always been our dream to see a Great Blue Whale. We have seen slides from a flight out to the Farallons which captured the passage of a Great Blue Whale below the plane - a thrilling experience even second-hand.

Reading the report of forty-one Blue Whales observed in one sighting from the Farallons (Gulf of the Farallons NMSP Sightings Bulletin No. 2) is awe-inspiring and heartening. To have the opportunity to see the largest animal on earth, one so scarce that the entire world population is equal to that of one small town of humans, is not something that can be easily measured with dollar values, but has deep meaning for many people. (See attached poster for a nonquantifiable indication of public interest in the Blue Whale.)

Consider the joy so many people felt when they heard that "Humphrey", the whale that wandered into San Francisco Bay not long ago, had been re-identified in the Humpback population in the Gulf of the Farallons. How can we value that joy except by seeing that the opportunities to appreciate living whales are strongly protected off our coasts?

Given the status of the animals' populations and distributions, we should regard ourselves as very fortunate caretakers indeed of a world heritage. We must do all we can to protect these populations.

We are talking of protecting the habitat of unique, small reef animals, and also of supplying a safe habitat for the greatest animals in the world. If the sanctuary is to live up to its name, it needs to provide the maximum protection consistent with its law.

Thank you for your attention.

Sincerely,

Ruthann Corwin

Ruthann Corwin, PhD.

Robert R. Harrison

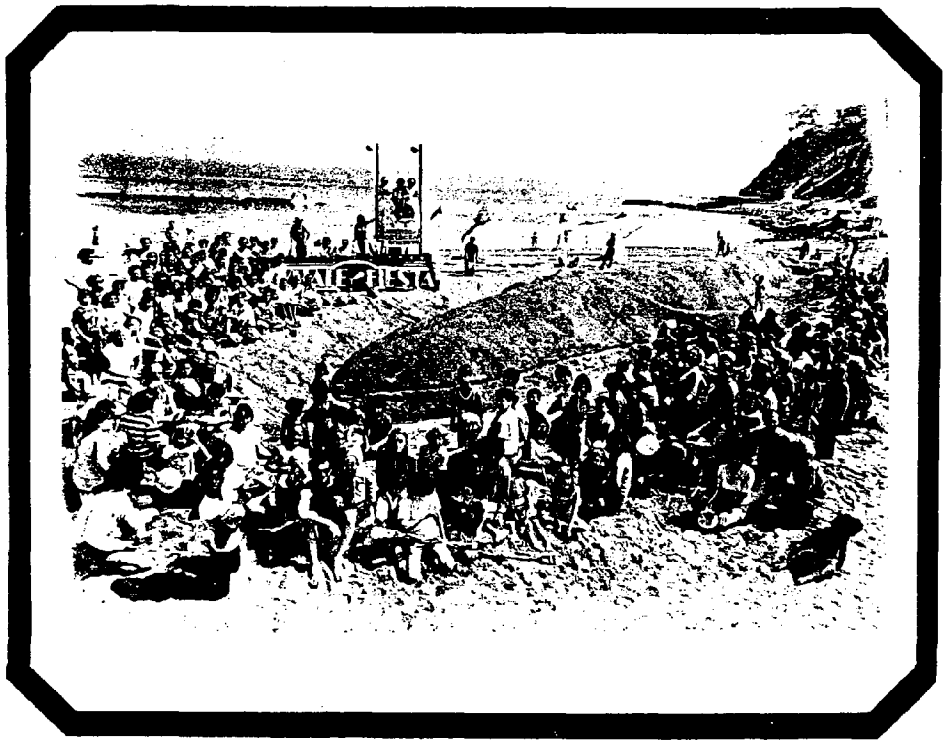
Robert R. Harrison

cc Mr. C. William Verity, Dept. of Commerce
Mr. Edward Wilcynski, Dept. of Commerce
Congresswoman Barbara Boxer
Marin County Board of Supervisors

OCT 1987
RECEIVED

NATIONAL ENVIRONMENTAL DAY, JUNE 4, 1977

CABRILLO BEACH, SAN PEDRO, CALIFORNIA



BLUE WHALE - 110 feet long, 14 feet wide

took 649 people 6½ hours to build.

AMERICAN CETACEAN SOCIETY

CABRILLO MARINE MUSEUM
Department of Parks & Recreation
City of Los Angeles

Sept.28,1987

Dear Acting Chief Allin,

I am commenting on the draft environmental impact statement,draft management plan,and proposed rule for the Cordell Bank National Marine Sanctuary. I strongly support the preferred alternative(Alternative # 2; Boundary Alternative #2) to designate this sanctuary and protect its fragile marine values. We request that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary. Thank you.

1

2

Yours truly,

Linda & Michael Couey

L. D. COUEY
5191 SPARROW DR.
HUNTINGTON BCH, CA 92649

1. See Generic Response A.

2. See Generic Response B.

TERWILLIGER NATURE EDUCATION CENTER
50 El Camino Drive, Corte Madera, California 94925-2057 (415) 927-1670

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The Honorable George Romney
Lynn Sedway, SRE
Andy Shepard
Sandra J. Swanson
William Whalen
Pete Wilson
US Senate

Vickie Allin, Acting Chief
Marine Estuaries Management,
Office of Coastal Resource/NOAA
Washington, D.C. 20235

Dear Ms. Vicki Allin:

1 2 We the undersigned are in favor of expanding the peripheral boundaries of the existing Cordell Ocean Sanctuary. We believe this rich biological habitat must be saved from the threat of future oil drilling exploitation.

1.) William A Randolph PO Box 92 Ross CA 94957
69 Sir Francis Drake Blvd.

2.) Christine Coughlan POB 745 Mill Valley CA 94942
the cottage at 35 Locust St. M.V.

3.) Sylvia Gray
58 Park Terrace
Mill Valley, CA 94941

4.) Calvin Terwilliger
328 Oakdale Ave
Mill Valley, CA. 94941

5.) Cynda Vyas
596 Westbrae Dr.
San Rafael, Ca 94903

1. See Generic Response A.

2. See Generic Response B.

Paul F. Covel

2860 Delaware Street
Oakland, CA 94602

Sept 30 '87

709329

Ms Vickie Allin
Acting Chief
Office of Ocean and Coastal
Research Management
National Ocean Service
1825 Connecticutt Ave NW
Washington, D.C. 20235

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY
1987 OCT -6

Comments on Cordell Bank

Dear Ms Allin:

1 In the case of the D.E.I., management plan and proposed rules for the Cordell Bank National Marine Sanctuary . . I want to support the preferred alternative --Alternative #2 -- and Boundary Alternative #2 -- to designate this sanctuary. Also, please designate that any and all off-shore oil and gas exploration and development be prohibited within this sanctuary.

2

Cordell Bank is a unique combination of oceanic topography, currents, nutrient supplies and marine life, wjich far outwwigh any possible yields in mineral resources. It must be saved!

Respectfully yours,

Paul F. Covel

Paul F. Covel

The Hon Wm. Verrity Jr —

Copies to Mr Edw. Wilczynski, US Dept of Commerce, Senators Cranston and Wilson, S.F. Bay Area congresmen.

1. See Generic Response A.

2. See Generic Response B.

Ms. Vickie Allin
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Dear Ms. Allin,
I urge you to support the Cordell Bank Sanctuary off of Pt. Reyes in California.

From what I understand, drilling for oil off the coast of California would not appreciably improve this country's energy needs. In fact, fossil fuel is on its way out! It is getting more and more expensive to extract crude oil, and less and less overall benefit is being derived from its use!

The money spent in military operations involved in 'protecting' our energy resources that we basically take from the Middle East, *could be used instead to support research and development of* native energy such as wind power, solar power, water (hydro) power, and geo-thermal power.

Eventually this will happen anyway, as it is clear that fossil fuel is on its way out. I have heard of reports that estimate 1995 to 2005 as the time when crude oil will no longer be the source of our basic energy needs.

In the meantime, there are unfortunately special interests who want to get that last bit of drilling done. I think it is a shame to allow them to do it at the expense of the integrity of the Northern California coast and its wildlife.

Please support the Cordell Bank Marine Sanctuary!

Thank you!
Sincerely,

No Response Necessary.

October 7, 1987

Ms. Vicki Allin, Acting Chief
Marine and Estuarine Managment Division
OCRM, National Ocean Service/NOAA
1825 Connecticut Ave., NW
Washington DC 20235

Dear Ms. Allin,

I am writing in support of establishing a Cordell Bank Marine Sanctuary off the coast of Northern California. I don't know whose brilliant idea this was, but it is the best conservation proposal in a long time.

I am sure your office is aware of the immense biological diversity that now thrives in this sensitive area. I have known scuba divers and fishermen alike to compare it to the Monterey Bay aquarium...only without windows. Truly this area deserves a special measure of protection so that we can continue to harvest the fishery resource that uses the Cordell Bank for breeding, but also equally important to have an environment that can be used for marine research purposes.

1 Marine mammals, seabirds, and fish utilize the area for their migrations. The boundary alternative #1 is an obvious first choice for sanctuary limits. But even the #2 boundary alternative would be more acceptable than #3. The #3 alternative does not extend protection to the marine sphere of influence that would be expected to impact the Cordell Banks. #1 alternative gives ample protection while #2 gives marginal protection.

2 Between assaults by the Interior Dept. to open up tracts for offshore oil and the potential for ocean discharges of sanitary waste, it is increasingly important to establish areas that can continue in their natural splendor to provide habitat for marine species. There should at least be a ban on any oil exploration within the #1 boundary zone if sanctuary status is not achieved.

The resource base within Cordell Bank is a special treasure that we should make every effort to conserve so that future generations can continue to enjoy the bounty of an undisturbed marine environment. By insuring that the carrying capacity of the area is not impacted by oil development or overfishing, the Cordell Bank can be a resource for many generations to come.

Can you imagine not having national treasures like Yellowstone, Yosemite and the Grand Canyon? It took a forward look and strong resolve to make those places beyond the reach of economic exploitation. Please consider establishing the Cordell Bank Marine Sanctuary with the most extensive boundary possible.

Regards,

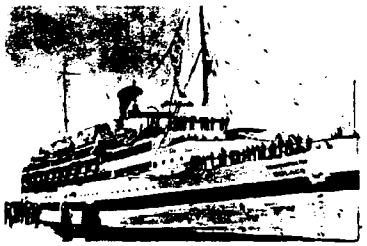
Linda Curry

Linda Curry
747 Mill St.
Santa Rosa, CA 95404

1. See Generic Response A.

2. See Generic Response B.

MEMBER OF:
Fleet Reserve Association—
Br. 46 Pearl Harbor
S.F. Chapter TROA, (P.I.O. 1980 Convention)
USN & USMC Museum Association, San Francisco
U.S. Naval Institute
American Battleship Association
Navy League of United States
American Mil. Ret. Association
AARP
Booster, San Francisco Police Activities League
NAUS
MOWW, San Francisco Chapter
Peninsula Humane Society, Sr. Mbr.
Ret. Emps., C&C of San Francisco (Life Member)
Marines' Memorial Club



"THE USS SOLACE WAS THERE"
by
Ensign H. C. 'Pat' DALY, MSC, USN Ret.
1951 - 28th Avenue – (415) 731-4782
San Francisco, California 94116

THE SOLACE WAS THERE where the action was compiled from Memoirs of a U.S. Navy Hospital ship during WW-2 in the Pacific War Theatre—submitted by her crew, staff and some of the over 25,000 patients served by her during steaming *170,000 miles* in continuous 45 months, earning seven battle stars. First U.S. Navy hospital ship to be engaged in an enemy action at Pearl Harbor, December 7, 1941 and first to take beachhead casualties at Tarawa. Roi-Namur: Eniwetok-Parry: Saipan-Guam: Palaus: Iwo Jima and Okinawa including Kerama Retto action.

Ms. Vickie Allen, Acting Chief,
Marine and Estuarine Management Division,
Office of Ocean and Coastal Resource Management Div., 25 September 1987
National Ocean Service/ NOAA,
1815 Connecticut Avenue, N.W.,
Washington, D.C. 20235

Dear Ms Allen:

1 I am writing to you as a concerned citizen, commenting on the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary. I wish to express my strong support for the preferred alternative #2, to designate this sanctuary and to protect its fragile marine values. However, please request that this sancuary must be protected for its fragile marine values by prohibiting off-shore oil and gas exploration and development within the entire sanctuary boundary.

2

If we can send a man to the moon, we should be able to protect the lives of our treasured Marine Life and sanctuaries.

SINCERELY YOURS, A concerned citizen,

HAROLD C. DALY

CC:

The Honorable C. William Verity Jr.,
Secretary of Commerce
Mr Edward Wilcznski, Acting Chief,
Ecology and Conservation Div, Dept., Commerce.
Senator Alan Cranston, (California)
Senator Pete Wilson, (California)
Richard Spotts, California Representive
Defencers of Wildlife.
File

1. See Generic Response A.

2. See Generic Response B.

September 29, 1987

Ms. Vickie Allin, Acting Cheif
Marine and Estuarine Management Division
Office of Ocean & Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Dear Ms. Allin

I am writing concerning the draft environmental impact statement, etc. for the Cordell Bank National Marine Sanctuary.

1 Considering the rapid decline in the quality of the earth's natural wonders and resources, I urge you to do all you can to protect this sanctuary from oil exploration and any other environmental degrading useage.

1. See Generic Response B.

Sincerely,

Denise D'Anne

Denise D'Anne
351 Guerrero St.
San Francisco, Ca. 94103

cc: Mr. Edward Wilczynski, Acting Chief
Ecology and Conservation Division
Room 6814
U.S. Department of Commerce
Washington, D.C. 20230

Senator Alan Cranston

Senator Peter Wilson

37 CALHOUN TERRACE
SAN FRANCISCO, CA 94133

October 5, 1987

Ms. Vickie Allin
Acting Chief
Marine and Estuartine Mgmt. Div.
Office of Ocean and Coastal Resource Mgmt.
National Ocean Service/Noaa,
1825 Connecticut Ave., N.W., W
Washington, D.V.· 20235

RE: DRAFT ENVIRONMENTAL IMPACT
SATEMENT, DRAFT MANAGEMENT PLAN,
PROPOSED RULE FOR CORDELL BANK

1 2 We wish to express our strong support for the preferred alternative (Alternative #2 - Boundary Alternative #2) to designate this sanctuary and protect its fragile marine values. The sanctuary regulations should be strenthened by *PROHIBITING OFF SHORE GAS AND OIL EXPLORATION AND ANY OTHER ~~DEVELOPMENT~~.*

We cannot invision anything worse than exploiting this fragile ecosystem and all that is environmentally involved within its boundaries.

Thank you for considering this most imporatant issue.

Sincerely,

Mr. + Mrs. A. de Laet

Mr. and Mrs. Alberic de Laet

Mr. & Mrs. Alberic de Laet
37 Calhoun Terrace
San Francisco, Ca. 94133

OCT 1987 RECEIVED

1. See Generic Response A.

2. See Generic Response B.

September 29, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, DC 20235

Dear Ms. Allin:

I am writing this letter to express my concern for the preservation of the Cordell Bank National Marine Sanctuary. It is my understanding that drafts have been implemented for an environmental impact statement and management plan, and for a proposed ruling. I wish to express my strong support for the preferred alternative (Alternative #2; Boundary Alternative #2) to designate this sanctuary and protect the marine life existing on and around the Bank boundaries. 1

I would also like to request that sanctuary regulations be enforced and strengthened by the prohibition of off-shore oil and gas exploration and development within the entire sanctuary boundary. 2

Thank you for your consideration of my views.

Sincerely,

Michelle L. Dethke
647 Beacon Street #4
Oakland, CA 94610

cc: Mr. Edward Wilczynski, Acting Chief, Ecology and Conservation Division, US Department of Commerce
The Honorable C. William Verity, Jr., Secretary of Commerce, U.S. Department of Commerce
Senator Alan Cranston, U.S. Senate
Senator Pete Wilson, U.S. Senate

1. See Generic Response A.

2. See Generic Response B.

709339

1987 OCT -1 P 4:44
EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY

September 29, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, DC 20230

Re: Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

I am writing in regard to the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary.

1 2 In my opinion, the best plan is the Alternative #2 and Boundary Alternative #2. Sanctuary regulations should be strengthened by prohibiting any offshore oil and gas exploration and development within the entire sanctuary boundary.

Sincerely,

(Mrs.) Helene Mickard
356 Park Street
San Francisco, CA 94110

cc to Mr. Edward Wilczynski, the Honorable C. William Verity, Jr., Senator Alan Cranston, Senator Pete Wilson, the Honorable Nancy Pelosi

1. See Generic Response A.

2. See Generic Response B.

Theresa A. Dillon
69 Point San Pedro Road
San Rafael, CA 94901
October 8, 1987

Vickie Allin, Acting Chief
Marine & Estuarine Management Division
Office of Ocean & Coastal Resources Mgmt.
National Ocean Service/NOAA
Washington D.C. 20235

Re: Cordell Bank

Dear Ms. Allin:

I understand that Cordell Bank off of Point Reyes is under consideration for designation as a marine sanctuary, and that the public is invited to comment on such.

Although my knowledge on this subject is limited, I do know enough to realize that the establishment of a marine sanctuary in the area contemplated is necessary and would be beneficial.

Cordell Bank is a sea mount supporting an elaborate biological community. It is invaluable for environmental studies in biogenetics and phylogenetics of an isolated biotic community. Several previously unclassified species have been discovered at Cordell Bank amongst the rich animal life that abounds there. In addition, it is home to the federally protected California hydrocoral.

Ocean water covers almost 71% of the Earth's surface. Only a small portion of the ocean--the shallow coastal waters--is biologically productive. Over 60% of the world's total marine catch comes from the continental shelves. Yet this productive shallow water is the site of heavy oil tanker traffic and off-shore drilling rigs, and consequently where the major oil spills occur (as well as industrial pollution and toxic waste dumping). Our entire coastline is already in jeopardy from oil contamination, and the advent of increased off-shore drilling will only place it in greater jeopardy. The Puerto Rican and, more recently, the Pac Baroness can attest to this very real hazard.

It is therefore vital to protect these areas from such dangers, especially geologically unique areas like Cordell Bank. I would strongly urge you to approve designation of Cordell Bank as a marine sanctuary, and allow for a wide buffer zone to ensure that it will not be encroached upon. The integrity of our coastal habitat, and our future, depend upon it.

Very truly yours,

Theresa A. Dillon

THERESA A. DILLON

/tad

1. See Generic Response A.

Susan Dinsmore
1132 Cole Street
San Francisco, California 94117

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

1 I am writing to express support for Boundary Alternative NO. 1 for Cordell Bank.

2 I wish there to be a complete ban on all hydrocarbon and other mining and mineral activity at Cordell Bank . There should be a ban on these activities from the outset.

I have dived Cordell Bank on numerous occasions and use the coastal areas in the area. Ihave been delighted by the wonderful life on the Bank. Having dived in almost every part of the world from Tahiti to Vancouver to Africa I am convinced that the Cordell Bank is a unique and therefore a priceless and valuable resource for our country. Todefile this are with drilling or mining or developemental activity of any kind would be a crime.

Other people I am familiar with in Marin and in the ecological circles in the Bay Area know of the forthcoming designation of Cordell Bank as a Marine sanctuary. There is a good deal of ridicule from these people for the idea of Cordell Bank allowing developmental activity. They believe as I do that if you are going to designate a Marine Sanctuary, then it ought to be just that, not a sell-out to commercial interests. I would be interested in what justification there exists to allow any activity in that area. I could not see that any such activity would be justified, and neither do any of the people I know.

Therefore I support Boundary Alternative NO.1, and wish there to be no allowance for any devleopmnet from the outset.

Sincerely,

Susan Dinsmore

1. See Generic Response A.

2. See Generic Response B.

711 Alameda
Redwood City, Calif. 94061
Sept. 28, 1987

Dear Acting Chief Allin,

1 I am commenting on the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary. I strongly support the preferred alternative (Alternative # 2; Boundary Alternative # 3) to designate this sanctuary and protect its fragile marine values.

2 We request that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary. Thank you.

Yours truly,

Mr. & Mrs. L. DuPertuis

1. See Generic Response A.

2. See Generic Response B.

9 October 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N. W.
Washington, D. C. 20235

Dear Ms. Allen:

I would like to take this opportunity to express my support for designating Cordell Bank as a National Marine Sanctuary. I have been an active member of the Cordell Bank Expedition for ten years and as a diver and underwater photographer I have had the opportunity to observe and photograph the flora and fana first hand.

On my first dive, it was instantaneously apparent that Cordell Bank was like no other place I have dived anywhere along the California Coast. Among some of the most notable features on Cordell Bank were:

1) Clearness of the water (visibility) resulting in high light level.
2) An extremely healthy and abundant growth of marine biota.
3) Large numbers of schooling fish.

Clearly Cordell Bank exhibits an area of high productivity, ranging from the bottom dwelling organisms to the bird and mammal population it supports. Part of this high productivity is due to its unique location on the edge of the continental shelf. Here the upwelling of nutrient rich water from the ocean bottom combined with high light level

makes Cordell Bank a most unique place, a place unsurpassed anywhere along the California Coast.
In addition, many undescribed species and one genus have been found on Cordell Bank and I believe there is a high probability of discovering more new organisms living on Cordell Bank.

Cordell Bank still remains in a pristine state, virtually undisturbed by human intervention. We now have an opportunity to ensure it remains this way by declaring it as a national marine sanctuary. Furthermore, to provide maximum protection to Cordell Bank Iam in favor of adopting boundary alternative #1 and above all allowing no hydrocarbon activity within this boundary. 1 2

Thank you for taking the time to read this letter and I hope you found my comments useful.

Sincerely,
Donald D Dvorak
Donald D. Dvorak
2218 Ventura Place
Santa Clara, CA. 95051

1. See Generic Response A.
2. See Generic Response B.

216 Carmel Avenue
El Cerrito, CA 94530
9 October 1987

Ms. Dickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N. W.
Washington, D. C. 20235

Dear Ms. Allin,

1 I am writing to support the creation of the Cordell Bank National Marine Sanctuary. I favor Boundary Alternative #1, which includes the largest area of those proposed. I consider it

2 imperative that all activities relating to hydrocarbon development or exploration (offshore test drilling, oil rigs, etc.) be prohibited in this area from the start. I also recommend that there be some provision made for monitoring the area. I further

3 suggest that there be a ban on activities that involve actual contact with the ridges, as by anchoring there, since the organisms growing there are exposed to and will be damaged by anything that touches the bottom.

I know that this is an exceptionally rich area for subtidal rocky substrate dwellers, as I am one of the few people who has dived there. I am a scientist by training and profession, I am an underwater photographer, and I have studied marine biology for several years.

Sincerely yours,

Sue J. Estey

Sue J. Estey, Ph.D.

1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response D.

4th Oct. 87.

TO: Ms. Vickie Allin, Acting Chief, Marine Estuarine Management.

In 1981 Cordell Bank was proposed for designation as a national marine sanctuary. After years of study, draft documents are now available for public comment. I am commenting on the draft environmental impact statement and support the preferred alternative (Alternative 2) for boundary Alternative 2) to designate this sanctuary and protect its fragile marine values. We also must prohibit any off-shore oil and gas exploitation. With so many vital marine sanctuaries threatened by human exploitation it is of utmost importance to save this ecosystem.

1. See Generic Response A.

2. See Generic Response B.

Sincerely

Lewis Evans

Please reply:

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22
OCT 1987
RECEIVED

Mike Farmer
1640 Sierra Drive
Petaluma, CA
Oct. 10, 1987

Ms. Allin,

I am writing this letter to you in regards to the designation of Cordell Banks, CA, as a National Marine Sanctusry. I feel that it is imperative that the area boundary #1 be established for the protection of this very unique and pristine area. I wish to express my adamant desire the the entire area have a ban on all hydrocarbon activity. I cannot emphasize enough the importance of the ban. One only needs to see some of the photographs and video of the underwater area to see how fragile this area is, and see how detrimental to the area that would be possible should hydrocarbon activity be allowed. I must insist that as a concerned American citizen, this area receive the entire support you can give it in this direction. I will do everything in my power to see that this area be protected. A great number of my friends and relatives feel the same way. We completely support the Area Designation Boundary No. 1, and a ban on all hydrocarbon activity, and further request that additional funds for on site monitoring, and that provisions for enforcing the regulations be ammended to include a ban on all contact with the shallow ridges (such as anchoring). We will do all that we can to fight for these recommendations and additional funding as necessary to preserve this beautiful area.
Thank you.

1
2
3
4

Sincerely,

Mike Farmer

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,
Bea Flint
Box 298
Point Reyes. Ca 94956
Bea Flint

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Coral Flint
Inverness Ca
94937

September 30, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management
National Ocean River Service/NOAA
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Re: Draft EIR and Management Plan and Proposed Rule for the Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

1 I am writing to register my STRONG SUPPORT FOR ALTERNATIVE #2; BOUNDARY ALTERNATIVE #2 to designate this sanctuary and protect its fragile marine life.

2 Please also strengthen the sanctuary regulations by PROHIBITING ANY OFF-SHORE OIL AND GAS EXPLORATION AND DEVELOPMENT WITHIN THE SANCTUARY BOUNDARY.

Cordell Bank, located 20 miles west of Point Reyes, supports an incredibly diverse and abundant array of marine creatures. Let us preserve and protect this natural wonder for future generations.

Sincerely,
Ellen M. Frank
243 Holyoke St.
San Francisco, Ca 94134

cc: Mr. Edward Wilczynski, Acting Chief
Ecology and Conservation Division, RM 6814
U.S. Dept. of Commerce
Washington, D.C. 20230

The Honorable C. William Verity, Jr.
Secretary of Commerce
U.S. Dept. of Commerce
Washington, D.C. 20230

Senator Pete Wilson and Senator Alan Cranston
Senate Office Building
Washington, D.C. 20510

1. See Generic Response A.

2. See Generic Response B.

10/6/87

N.O.A.A., Secretary of the Interior
or whomever it may concern:

Please do whatever possible to make
Cordell Bank in Sonoma County, California
a national marine sanctuary. I feel it
is very important to protect this area
from oil drilling and sewage outfall.

1
2

Thank you,

Chantal Frankenbach

1. See Generic Response B.

2. See Generic Response C.

EDITH N. FRIED
22 CROWN TERRACE
SAN FRANCISCO, CALIFORNIA 94114

September 30, 1987

Ms Vickie Allin
Acting Chief, Marine & Estuarine Management Division
Office of Ocean & Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms Allin,

Re: Draft Environmental Impact Statement
for Cordell Bank National Marine Sanctuary.

1 2 I wish to express my support for the preferred Alternative #2 to designate this sanctuary and protect its marine life. However, this alone is not enough. I would urge you to strengthen the regulations and prohibit any off-shore gas and oil exploration within the boundaries of the sanctuary. We Californian environmentalists live in fear that our coast will be ravaged and and our marine wild life destroyed. How can we explain to future generations that we just set inactive while greed and exploitations took over our coast and devasted it?

Sincerely

Edith Fried

CC: Edward Wilczynski, US Dept of Commerce
Hon C. Wm Verity,Jr, Secretary of Commerce
Senator Alan Cranson
Senator Pete Wilson

1. See Generic Response A.

2. See Generic Response B.

Alice Friedemann
1235 Masonic Ave
San Francisco, CA 94117

MS. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Ave, N.W.
Washington, D.C. 20235

Dear Ms. Allin;

1 I am writing regarding the Cordell Bank National Marine Sanctuary. I'd like to ask you to support alternative #2 which is the strongest measure protecting the fragile marine ecosystem. However, I don't think this measure goes far enough:

2 we need stronger prohibitions against any off-shore oil drilling. A disaster such as the one in Santa Barbara over a decade ago would do immeasurable harm to Cordell Bank.

Thank you ~~for your~~ very much for your attention to this matter.

Sincerely,

Alice Friedemann

CC: Mr. Edward Wilczynski
The Honorable C. William Verity
Senator Pete Wilson
Senator Alan Cranston

1. See Generic Response A.

2. See Generic Response B.

Tina Frisco
647 Beacon St., #3
Oakland, CA 94610

29 September 87

709311

Vickie Allin, Acting Chief
Marine and Estuarine
Management Division
Office of Ocean and
Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY
1987 OCT -6 A 8:16

Dear Ms. Allin:

I am writing to comment on the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary.

1 I strongly support the preferred alternative (Alternative #2: Boundary Alternative #2) to designate this sanctuary and protect its fragile marine values.

2 I request that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary.

I would appreciate hearing from you on this matter. Thank you.

Sincerely,

Tina Frisco

Tina Frisco

cc: Edward Wilczynski -- Dept. of Commerce
C. William Verity, Jr. -- Sec. of Commerce
Senator Alan Cranston
Senator Pete Wilson
Rep. Ronald Dellums

1. See Generic Response A.

2. See Generic Response B.

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Diovision
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, D.C. 20235

Dear Ms Allin:

1 2 3/4 I am writing to express my support for Boundary Alternative #1 for the proposed Cordell Bank National Marine Sanctuary, for support of a complete and total ban on all hydrocarbon activity withing the sanctuary boundary, and to urge you to put these provisions into the sanctuary designation document at the outset. Additional funds should be designated for supporting on-site monitoring, and the provisions for enforcing the regulations should be ammended to include a ban on all contact with the sea floor in this sanctuary..such as anchoring, etc.

The preservation of such a sanctuary is mandatory if we are to have any natural history heritage to hand down to the next generation. No significant sedimentary basin exists in the vicinity of the proposed sanctuary so eliminating it from hydrocarbon exploration activities can not cause anything but the obligatory hew and cry from the petroleum companies. They can not be seriously considering this area for anything but a precedent. What possible reasons could they have that would jeprodize the fragile biota and the unique environment of Cordell Bank?

I urge you to seriously consider the implications of not defining the Cordell Bank National Marine Sanctuary as a true maring sanctuary.

Sincerely,

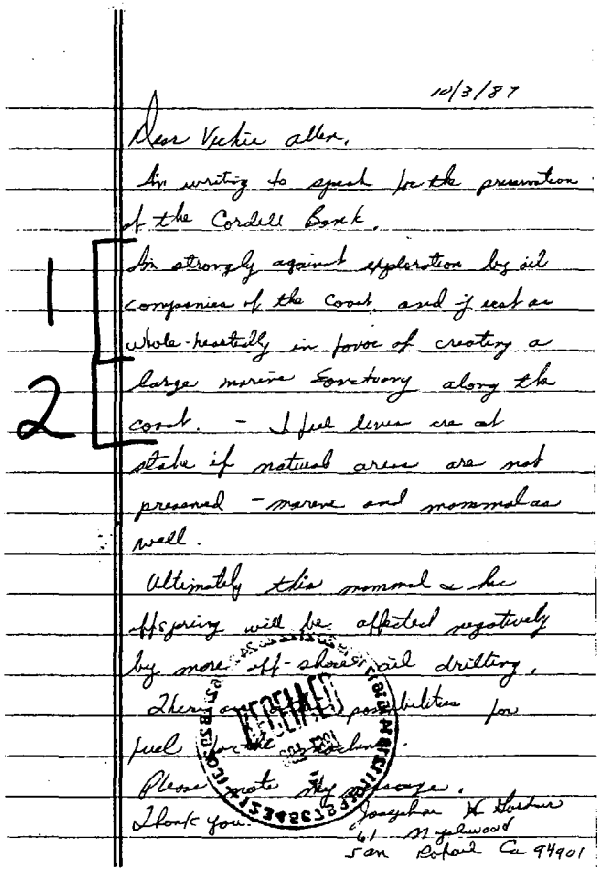
James V. Gardner
1850 Sunshine Valley Road
Moss Beach, CA 94038

1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response G.

4. See Generic Response D.



10/3/87

Dear Vickie Allen,

I'm writing to speak for the preservation of the Cordell Bank.

1 I'm strongly against exploration by oil companies of the Coast and I rest as whole-heartedly in favor of creating a large marine Sanctuary along the coast. - I feel lives are at

2 stake if natural areas are not preserved - marine and mammal as well.

Ultimately this mammal & his offspring will be affected negatively by more off-shore oil drilling.

There are other possibilities for fuel for the machine.

Please note my message.

Thank you.

Josephine H Gardner
61 Maplewood
San Rafael Ca 94901

1. See Generic Response B.

2. See Generic Response A.

Oct 11, 1987

Ms. Vickie Allen:

All legislations and activities supporting the Cordell Bank Marine Sanctuary - I am in strong support and approval of:

1. Creation of the Cordell Bank Marine Sanctuary.

1 2. I also support Boundary Alternative #1, which would provide the broadest area of protection!

2 3. Most importantly - a ban on all off-shore drilling activities and leasing, exploration & development, within the entire Cordell Bank National Marine Sanctuary, from the Beginning!

Sincerely,

Gaimari, T.
P.O. Box 443 - Cotati Ca.
94928

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Frederick Gray

Frederick Gray
Novato, CA

1. See Generic Response A.

2. See Generic Response B.

Ms. Vicki Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Ref: Support for Boundary Alternative #1, Cordell Banks National Marine Sanctuary Proposal

Dear Ms. Allin,

As someone who has seen the important ecology of Cordell Banks, I would like to express my support for its designation as a National Marine Sanctuary. I feel that sites such as these on offshore areas along the coast of California are particularly important due to the potential impact of oil and mineral exploration in the future. These sites can serve as "health" indicators of our coastal waters and in addition are important stand-alone habitats that have important consequences for the overall oceanic food chain.

Cordell Banks gain Sanctuary status it should have appropriate funding in conjunction with this status to provide for complete baseline studies that will provide data for the future evaluations of the health of our coastline. Thank you for your time in considering my pleas. I am truly concerned about the future of Cordell Banks and feel that anyone who has seen it would feel as strongly. Thank you again for your time.

Sincerely,
Don Griffin

1. See Generic Response G.

October 9, 1987

Ms. Allin,

I am writing to express my strong support for Boundary Alternative #2 in regards to the Cordell Bank National Marine Sanctuary. I want the sanctuary regulations strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary. As a frequent user of the San Francisco Ocean Beach, I don't want the ocean and its inherent beauty tampered with any further than it already is. Maintain the sanctuary and strengthen the law to prevent further abuse of this ecologically fragile area. I appreciate your attention in this matter.

Sincerely,

Carl H. Kaiser II

Carl Henry Kaiser II
2162 44th Ave.
San Francisco, Ca.
94116

1. See Generic Response A.

2. See Generic Response B.

5 October 1987
1152 Jackson # 5
San Francisco, Ca
94133

70?401

C. William Verity Jr.
Secretary Designe
U.S. Dept of Commerce

1981 OCT -8 A 11:31
EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY

Dear Mister Verity

Your assistance is needed to protect an endangered area off of California's northern coast.

The opportunity to creat a unique marine sanctuary comes but once and to this end I urge you to take all posible steps to protect the Cordell Bank in its entirety. The DEIS for this area lists three possible configurations. 1 Only alternative # 1 is acceptable due to pelagic consideration. To make a marine sactuary without a buffer zone would be foolhardy in the extreme; 2 as would any provisions that might allow future exploitation for petroleum or minerals. One does not creat with the right hand only to destroy with the left.

Please use your position and your conscience to protect an unreplaceable treasure.

Sincerely,

David Hoffman

1. See Generic Response A.

2. See Generic Response B.

Paul Hughes
720-B Beaver St.
Santa Rosa, CA 95404

Sept. 30, 1987

Vickie Allin, Acting Chief
Marine and Estuarine Management Div.
OCRM, National Ocean Service/NOAA
1825 Connecticut Ave. NW
Washington, D.C. 20235

Dear Ms. Allin:

I am writing to express my support for the designation of the Cordell Bank National Marine Sanctuary off Northern California.

Further, I support Boundary Alternative #1, which provides for the broadest area of protection, and I support the inclusion of a ban on all offshore drilling activities within the sanctuary from the beginning.

Thank you.

Sincerely,

Paul Hughes

OCT 1987
RECEIVED

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Deborah J. Jackson

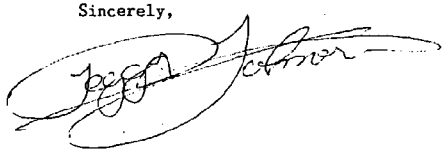
Deborah J. Jackson
SAN Rafael, Ca

Peggy Johnson
3 Branch Road
Larkspur, CA
Oct.10, 1987

Ms. Allin,

1 2 I am writing this letter to you in regards to the designation of Cordell Banks, CA, as a National Marine Sanctusry. I feel that it is imperative that the area boundary #1 be established for the protection of this very unique and pristine area. I wish to express my adamant desire the the entire area have a ban on all hydrocarbon activity. I cannot emphasize enough the importance of the ban. One only needs to see some of the photographs and video of the underwater area to see how fragile this area is, and see how detrimental to the area that would be possible should hydrocarbon activity be allowed. I must insist that as a concerned American citizen, this area receive the entire support you can give it in this direction. I will do everything in my power to see that this area be protected. A great number of my friends and relatives feel the same way. We completely support the Area Designation Boundary No. 1, and a ban 3 4 on all hydrocarbon activity, and further request that additional funds for on site monitoring, and that provisions for enforcing the regulations be ammended to include a ban on all contact with the shallow ridges (such as anchoring). We will do all that we can to fight for these recommendations and additional funding as necessary to preserve this beautiful area. Thank you.

Sincerely,



1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

IRIS KAKUGAWA
Regional Trainer
#808 Longs San Diego D.O.
5500 Grossmont Center Dr
La Mesa, CA 92041

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY
1987 OCT 15 A 9:32

Mr. C. William Verity, Jr., Secretary Designe
United States Department of Commerce
Washington, D. C. 20230

October 8, 1987

Dear Mr. C. William Verity, Jr.,

1 I would like to express my support for Boundary Alternative #1.
2 I desire a complete and total ban an ALL hydrocarbon activity within the sanctuary boundary, and insist that these provisions be included in the sanctuary designation document AT THE OUTSET.

3 I recommend that additional funds be designated for supporting on-site monitoring, that provisions for enforcing the regulations
4 be amended to include a ban on all contact with the shallow ridges (such as anchoring).

I have seen this beautiful place in photos and videos, and believe it to be an extraordinarily rich benthic community of life; the home of very rare and unusual species of hydrocorals, sponges, scallops, and snails, with an abundance of fish, and other (some endangered) marine life.

I strongly support Sanctuary status for the Cordell Bank area, and recommend that the OCS ban be extended to include the whole Sanctuary, not just the core area.

Please help us prevent the offshore oil and gas exploration and development that would change, destroy, and mutilate any of the Cordell Bank Marine Sanctuary.

Sincerely,

Iris Kakugawa

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY
1987 OCT -6 A 8:16

September 29, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20230

Re: Designation of the Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

I am commenting on the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary. I wish to express my strong support for the preferred alternative (Alternative #2; Boundary Alternative #2) and to request that sanctuary regulations be strengthened by the prohibition of any off-shore oil and gas exploration and development within the sanctuary boundary. 1 2

Sincerely,

(Miss) Vera E. Larson
175 Middlefield Drive
San Francisco, CA 94132

cc to: Edward Wilczynski, G. William Verity, Senator Alan Cranston, Senator Pete Wilson, and Representative Nancy Pelosi.

1. See Generic Response A.

2. See Generic Response B.

October 9, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin,

RE: PROPOSED CORDELL BANK MARINE SANCTUARY

I was pleased to hear the results of the recent public hearings in the San Francisco Bay area - public testimony overwhelmingly in support of designation, and unanimous in recommending an enlarged boundary with no hydrocarbon activity anywhere within the sanctuary. I would like to take this opportunity to add my support for these provisions and to further recommend additional provisions.

My formal training and in situ studies in Marine Biological Science and the observations I have made personally in a number of dives on Cordell Bank have helped me realize the extraordinary uniqueness of this place as an abundant, diverse and relatively unaffected self-sustaining ecosystem. Sadly, a submarine system with these special attributes and one that can be studied readily and offer a benchmark for future generations is rare in the world today. Realizing these things I believe it is our duty to provide smart management provisions that will assure protection into the future and comply with public desire.

1 I strongly support the Boundary Alternative #1 (to include waters surrounding Cordell Bank) and a complete and total ban on ALL
2 hydrocarbon activity within the sanctuary boundary and that these provisions be included in the sanctuary designation document at the outset and be maintained clearly and consistently throughout all versions of the document. Also, I strongly recommend that
3 additional funds be designated for on-site monitoring to verify
4 compliance, and that provisions for enforcing the regulations be ammended to include a ban on all contact with the shallow ridges (such as anchoring). As you know the shallow ridges are inhabited

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

by the most delicate of organisms in the designated area and are those 'indicator' organisms that should be closely protected. I have personally seen damage of rare hydrocoral beds and sponge aggregations in these exposed areas caused by man's activities.

I want to be sure that my support and my additional recommendations for the Cordell Bank Sanctuary Designation will be addressed and placed in the record. Please respond.

And thank you for your fine work in establishing standards and protecting resources important to health, understanding and smart management in tomorrows world.

Very truly yours,

Stephen Lawler
2264 Monitor Court
San Jose, CA 95125
408 723-2008

ANNE LAYZER • 24 HEATHER WAY • MILL VALLEY CA 94941 (415) 388-8227

October 2, 1987

Dear Vickie Allin,

I support the creation of the Cordell Bank Marine Sanctuary. The area is a particularly precious treasury of wildlife, including several endangered species. I support the Boundary Alternative #1 and the inclusion of a ban on all offshore drilling activities, including leasing, exploration, and development, within the entire Sanctuary from the very beginning.

1
2

Yours Sincerely,

Anne H - Layzer

1. See Generic Response A.

2. See Generic Response B.

28 Sept 87

Dear Ms. Allin:

With regard to the Cordell Bank National Marine Sanctuary, please support the strengthening of sanctuary regulations by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary.

Sincerely

F. Levin

Frank Levin
927 Taraval Street
San Francisco, CA 94116

1. See Generic Response B.

1345 Taylor Street #26
San Francisco, CA 94108
October 7, 1987

Ms. Vickie Allin
Acting Chief
Marine and Estuarine Management Division
OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, DC 20235

Dear Ms. Allin:

1 I am writing to express my strong support for the designation of the Cordell Bank, west of Pt. Reyes, as a marine sanctuary. I also support boundary alternative #1, for protection of the broadest area.

2 I oppose all drilling activities in this area, from leasing on, and ask for your help in establishing a firm ban.

Thank you.

Sincerely,

Michele Liapes

Michele Liapes

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Gloria Lightner

GLORIA LIGHTNER
SAN Rafael, CA

September 30, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management
National Ocean River Service/NOAA
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Re: Draft EIR and Management Plan and Proposed Rule for the Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

1 | *I am writing to register my STRONG SUPPORT FOR* ALTERNATIVE #2; BOUNDARY ALTERNATIVE #2 to designate this sanctuary and protect its fragile marine life.

2 | Please also strengthen the sanctuary regulations by PROHIBITING ANY OFF-SHORE OIL AND GAS EXPLORATION AND DEVELOPMENT WITHIN THE SANCTUARY BOUNDARY.

Cordell Bank, located 20 miles west of Point Reyes, supports an incredibly diverse and abundant array of marine creatures. Let us preserve and protect this natural wonder for future generations.

Sincerely,

Mary Ellen Lynn
1639 Oklahoma St.
SF, CA 94110
415-647-2675

1. See Generic Response A.

2. See Generic Response B.

3505 FIRST INTERSTATE BANK TOWER
1300 S. W. FIFTH AVENUE
PORTLAND, OREGON 97201-5696
TELEPHONE (503) 227-7400

4100 FIRST INTERSTATE CENTER
999 THIRD AVENUE
SEATTLE, WASHINGTON 98104-4011
TELEPHONE (206) 447-0900

WEYMAN I. LUNDQUIST
A PROFESSIONAL CORPORATION
PARTNER
DIRECT DIAL (415) 772-6380

HELLER, EHRMAN, WHITE & McAULIFFE
ATTORNEYS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

333 BUSH STREET - SAN FRANCISCO, CALIFORNIA 94104-2878
CABLE HELPOW - TELEX 184-995 - TELECOPIER (415) 772-6268
TELEPHONE (415) 772-6000

525 UNIVERSITY AVENUE
PALO ALTO, CALIFORNIA 94301-1908
TELEPHONE (415) 326-7600

CAXTON HOUSE, (7/F
1 DUDDELL STREET
HONG KONG
TELEPHONE 5-266816
TELEX 65665 LAWYR HX

709327

1981 OCT -6 P 2:11
EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY

October 1, 1987

The Honorable C. William Verity, Jr.
Secretary of Commerce
U.S. Department of Commerce
Washington, D.C. 20230

Dear Judge Verity:

I am a supporter of Defenders of Wildlife and hereby comment on the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary. I strongly support the preferred alternative (Alternative #2; Boundary Alternative #2) to designate this Sanctuary and protect its fragile marine values. By prohibiting off-shore oil and gas exploration and development within the whole sanctuary boundary, we can strengthen the Cordell Bank National Marine Sanctuary.

1 [ ]
2 [ ]

Very truly yours,

1. See Generic Response A.

2. See Generic Response B.

936 Wisconsin Street
San Francisco, CA 94107
October 8, 1987

Ms. Vickie Allin
Acting Chief, Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue NW
Washington DC 20235

Dear Ms. Allin,

Cordell Bank

The purpose of this letter is to comment on the draft environmental impact statement, draft management plan and proposed rule for the Cordel Bank National Marine Sanctuary.

1 2 I wish to express my strongest support for Alternative 2, Boundary 2; but urge that the regulations be strengthened to prohibit absolutely all forms of off-shore oil and gas exploration and development inside the sanctuary boundary. The greed and rapacity of the oil and gas seekers must be curbed while there are sanctuaries left.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Anne Mackarness

Copies to: Hon. C. William Verity, Jnr., Secretary of Commerce
Mr. E. Wilczynski
Senator Alan Cranston
Senator Pete Wilson
Representative Barbara Boxer

MR Williams

Sept 27, 1987

I fully support all efforts of PRESERVation for the CORDELL BANKS A NATIONAL MARINE SANCTUARY is NOW NECESSARY and one with STRONG protection from oil [1]

thank you

Don Mabary
P.O BOX 652
BODEGA BAY CA 94923

1. See Generic Response B.

April 29, 1997

Dear Ms. Allen:

Re: Draft EIR/management plan and proposed rule for the Cordell Bank National Marine Sanctuary

1 This postcard testifies to my STRONG SUPPORT FOR PREFERRED ALTERNATIVE #2; Boundary Alternative #2 to designate this sanctuary and protect its fragile marine life.

2 Please also strengthen the sanctuary regulations by PROHIBITING ANY OFF-SHORE OIL AND GAS EXPLORATION AND DEVELOPMENT WITHIN THE SANCTUARY BOUNDARY.

Sincerely,
Ellen Mark
San Francisco, Ca

1. See Generic Response A.

2. See Generic Response B.

Jack Marshall
2046 Leese Lane
Novato, CA 94945

Ms. Allin,

I am writing this letter to you in regards to the designation of Cordell Banks, CA, as a National Marine Sanctusry. I feel that it is imperative that the area boundary #1 be established for the protection of this very unique and pristine area. I wish to express my adamant desire the the entire area have a ban on all hydrocarbon activity. I cannot emphasize enough the importance of the ban. One only needs to see some of the photographs and video of the underwater area to see how fragile this area is, and see how detrimental to the area that would be possible should hydrocarbon activity be allowed. I must insist that as a concerned American citizen, this area receive the entire support you can give it in this direction. I will do everything in my power to see that this area be protected. A great number of my friends and relatives feel the same way. We completely support the Area Designation Boundary No. 1, and a ban on all hydrocarbon activity, and further request that additional funds for on site monitoring, and that provisions for enforcing the regulations be ammended to include a ban on all contact with the shallow ridges (such as anchoring). We <u>will</u> do all that we can to fight for these recommendations and additional funding as necessary to preserve this beautiful area. Thank you.

1
2
3
4

Sincerely,

Jack Marshall

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

October 9, 1987

Ms. Vickie Allin
Acting Chief, Maine and Estuarine Mgmt. Div.
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

Subject: Draft environmental impact statement
Draft management plan
Proposed rule for the Cordell Bank
National Marine Sanctuary

1 I strongly support the preferred alternative (Alternative #2); Boundary Alternative #2) to designate this sanctuary and protect its fragile marine values.

2 I request that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary.

Sincerely,

Elizabeth J. Mathews
(Mrs. Charles D. Mathews)

342 Hill Street
San Francisco, CA 94114

1. See Generic Response A.

2. See Generic Response B.

Valerie May
99 Hillside Ave
San Anselmo
CA 94960
Oct. 10 1987

~~Bd Sirich~~
~~2016 Leeds Lane~~
~~Novato, CA 94945~~
~~Oct. 10 1987~~

Ms. Allin,

I am writing this letter to you in regards to the designation of Cordell Banks, CA, as a National Marine Sanctusry. I feel that it is imperative that the area boundary #1 be established for the protection of this very unique and pristine area. I wish to express my adamant desire the the entire area have a ban on all hydrocarbon activity. I cannot emphasize enough the importance of the ban. One only needs to see some of the photographs and video of the underwater area to see how fragile this area is, and see how detrimental to the area that would be possible should hydrocarbon activity be allowed. I must insist that as a concerned American citizen, this area receive the entire support you can give it in this direction. I will do everything in my power to see that this area be protected. A great number of my friends and relatives feel the same way. We completely support the Area Designation Boundary No. 1, and a ban on all hydrocarbon activity, and further request that additional funds for on site monitoring, and that provisions for enforcing the regulations be ammended to include a ban on all contact with the shallow ridges (such as anchoring). We will do all that we can to fight for these recommendations and additional funding as necessary to preserve this beautiful area. Thank you.

Sincerely,

Valerie May

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

OCT. 1987
RECEIVED

September 30, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management
National Ocean River Service/NOAA
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Re: Draft EIR and Management Plan and Proposed Rule for the Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

1 I am writing to register my STRONG SUPPORT FOR ALTERNATIVE #2; BOUNDARY ALTERNATIVE #2 to designate this sanctuary and protect its fragile marine life.

2 Please also strengthen the sanctuary regulations by PROHIBITING ANY OFF-SHORE OIL AND GAS EXPLORATION AND DEVELOPMENT WITHIN THE SANCTUARY BOUNDARY.

Cordell Bank, located 20 miles west of Point Reyes, supports an incredibly diverse and abundant array of marine creatures. Let us preserve and protect this natural wonder for future generations.

Sincerely,

Joseph Mayer
243 Holyoke St.
S.F. CA 94134

cc: Mr. Edward Wilczynski, Acting Chief
Ecology and Conservation Division, RM 6814
U.S. Dept. of Commerce
Washington, D.C. 20230

The Honorable C. William Verity, Jr.
Secretary of Commerce
U.S. Dept. of Commerce
Washington, D.C. 20230

Senator Pete Wilson and Senator Alan Cranston
Senate Office Building
Washington, D.C. 20510

1. See Generic Response A.

2. See Generic Response B.

9/87

Dear Ms Allen,

1 I support the preferred alternative (alternative Boundary alternative #2) for a Cordell Bank National Marine Sanctuary. I urge banning offshore oil

2 + gas exploration + development extending through the whole boundary of the Sanctuary.

Sincerely,
Claudia McCuff
registered voter

OAKLAND, CA
28 SEP
1987

FROM C McCuff
3340 Betty Ln
Lafayette Ca
94549

Sinclair Lewis
USA
14

Sickie Allen,

TO: Acting Chief
Marine + Estuarine
Management Division,
Office of Ocean + Coastal
Resource Management
National Ocean Service/NOAA
Washington, D.C.
20235

Original

1. See Generic Response A.

2. See Generic Response B.

Karen A. Mendelow
1661 Grove Street
San Francisco, CA 94117

September 14, 1987

Ms. Vickie Allin
Acting Chief
Marine & Estuarine Management Division
Office of Ocean & Coastal Resource Management
National Ocean Service/NOAA
Washington, D.C. 20235

Dear Ms. Allin:

I am writing to you in support of the establishment of the California Ocean National Marine Sanctuary at Cordell Bank Sea Mount.

As a naturalist and whale watch expeditions leader for the Whale Center in Oakland, California I have been out on many nature expeditions to view the abundant marine wildlife along the California coast. In fact, last weekend I was out on a trip to the Pt. Reyes-Farallon Islands National Marine Sanctuary. Cordell Bank is adjacent to this area. On this trip we observed five blue whales, albatross, sunfish, Dall's porpoise, harbor porpoise, elephant seals, northern fur seal, California sea lion, murres, brown pelican, cormorant, sea gulls, sharks and tufted puffin. The abundance of wildlife in this part of the ocean is amazing. The waters are "teaming" with these species.

Cordell Bank, being the northernmost sea mountain and the place where the ocean flor rises from the depths of 1000-2000 feet below sea level to within 140-115 feet of the ocean surface, allows sunlight to penetrate the ocean surface and produces at the mountain peak, an environment where a rich variety of benthic organisms live. These organisms primarily provide the origin of the ocean food chain and feed small bottom feeders up to large marine mammals. It is very important that this area be protected so that the ecology of the region will stay intact.

By establishing this area as a sanctuary, this proposed area would be surrounded by a perimeter which would protect it from hazards of city pollution and potential offshore oil drilling which unfortunately for the California coast could be a potential disaster for the habitat of the region.

Please take time to review and study this proposal. If possible, make a trip to this area and take one of these wildlife/whale watching cruises so that you could see personally what is in our oceans. Thank you for your attention.

Sincerely,

Karen A Mendelow

KAREN A. MENDELOW

RECEIVED
SEP 1987

cc: Edward Wilczynski, Acting Chief, Ecology & Conservation Division, US Dept. Commerce
cc: Whale Center

No Response Necessary.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

A. R. Metoyer

A. R. Metoyer
SAN RAFAEL, CA

Ms Victoria Allen, Acting Chief
Marine + Estuarine Management Div.
Office of Ocean and Coastal Resource Management
NOAA
1825 Connecticut Ave NW
Washington DC 20235

Dear Ms Allen:

I am writing concerning the draft environmental impact statement + proposed rule for the Cordell Bank National Marine Sanctuary. I strongly support alternative # 2 - Boundary Alternative #2 - to designate this sanctuary + protect its fragile fauna + flora. I wish the regulations be strengthened by prohibiting any off-shore oil + gas exploration within the whole sanctuary boundary.

1. See Generic Response A.

2. See Generic Response B.

Our earth has finite resources and we need to save the few remaining ecosystems for our own survival as well as the survival of our planet for future generations.

Sincerely

Charles Metzler
64 Valley St
San Francisco, CA 94110

5210 Gates Rd.
Santa Rosa, CA 95404
Oct. 4, 1987

Ms Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Ave., NW
Washington, DC 20235

Dear Ms Allin,

I am writing to urge your support in creating the proposed Cordell Bank National Marine Sanctuary.

1 I also support Boundary Alternative #1, providing the broadest area of protection.

2 I strongly support inclusion of a ban on all offshore drilling activities, including leasing, exploration, and development, within the Cordell Bank Sanctuary from the beginning.

There is a tendency among some people to characterize Californians as heavy drivers who use a disproportionate amount of our nation's fuel. I assure you that we and our conservationist friends do not fit that picture at all. Although we live in the country at some distance from services we need, we plan carefully to avoid making more trips than necessary. Our son who works in San Francisco regularly uses public transit. It may well be that much of our state's fuel consumption is by visitors from other states, who understandable travel many miles while here to see points of interest, and by business people from other states who bring or rent cars to conduct their business here. Thus I object to Californians being asked to subject our coast, with its irreplaceable natural beauty and wildlife, to oil drilling. To subject the Cordell Bank, our richest fishery, even to exploration for oil would be to destroy it and the jobs of those whose livelihood depends on it.

Thank you for listening to my concerns.

Very truly yours,
Barbara Mayer

1. See Generic Response A.

2. See Generic Response B.

8 October 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 200235

Dear Ms. Allin,

I am writing to you today concerning the proposed National Marine Sanctuary for Cordell Bank (adjacent to the Farallon Islands National Marine Sanctuary in California).

Being a member of Cordell Bank Expeditions, I have made numerous dives on the Bank and have been fortunate to witness the profuse and unique marine life which inhabits this underwater oasis.

1 Also, being an underwater photographer and marine biologist, I have sadly witnessed the destructions caused by offshore oil drilling and oil spills. I appeal to you to support Boundary Alternative #1 (which includes the waters surrounding Cordell Bank), and to

2 include provisions for a complete and total ban on ALL hydrocarbon activity within the sanctuary boundary, as is the case with the other two California National Marine Sanctuaries. I argue you to include these provisions in the sanctuary designation document at the outset.

3 Further, I hope you will recommend that additional funds be designated for supporting on-site monitoring, and that provisions for enforcing the regulations be amended to include a

4 ban on all contact with the shallow ridges (such as anchoring).

On behalf of myself and future generations, I thank you for your support.

Sincerely,

Richard R. Moore
1984 Jonathan Avenue
San Jose, CA 95125

1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response G.

4. See Generic Response D.

Two Hill Street
Mill Valley, CA 94941
October 4, 1987

Ms. V. Allin, Acting Chief
Marine Estuarine Manag. Div.
Office of Ocean and Coastal
Resource Management
National Ocean Service/NOAA
Washington, DC 20235

Dear Ms. Allin:

The attached artice from the Independent Journal sets forth how valuable the Cordell Bank is and why the area should be protected now and for the future.

Please consider the importance and necessity for saving this treasure.

Sincerely,
Muriel Nullmeyer

RECEIVED
OCT 1987

1. See Generic Response B.

Copy

709455

October 4, 1987
2951 Derby St. #354
Berkeley, Ca 94705
1326

Ms. Vicki Allen,
Acting Chief,
Marine Ecosystems Mgmt. Div.
Office of Ocean & Coastal Resource Mgmt.
Nat'l. Ocean Service NOAA
1825 Connecticut Avenue, N.W.
Washington DC. 20235

1987 OCT 13

Dear Ms. Allen:

1 I urge your organization to designate alternative #2, Boundary alternative #2 as the rule for protecting the Gerdell Banks National Marine Sanctuary. I am strongly supportive of this alternative #2 plan. We must preserve these fragile marine values.

2 Also, I request that such sanctuary regulations be strengthened by prohibiting off-shore oil and gas explorations.

Sincerely,
Elizabeth Reckes

Cc's:
Senator Alan Cranston
Senator Pete Wilson
Mr. Edward Wik-zynski U.S. Dept. of Commerce
Commerce Secretary C. Wm Verity.

Copy

1. See Generic Response A.

2. See Generic Response B.

September 29, 1987

Ms. Vickie Allin, Acting Chief
Marine & Estuarine Management Division
Office of Ocean & Coastal Resource Management
National Ocean Service/NOAA
Washington, D.C. 20235

Dear Ms. Allin,

I would like to bring to your attention the proposal concerning the Cordell Bank National Marine Sanctuary. I support this proposal 100 percent. You see, there are many sea creatures such as invertebrates, fish, sea mammals (whales, sea otters, dolphins and such) and birds that need a healthy place to live. These animals don't have much clean safe space left protected from the harmful activities of man. I am sure that my friends, the sea animals, would enjoy a nice protected aquatic atmosphere, wouldn't you agree? Seeing as how there has been a lot of garbage dumping, toxic pollution, oil spills, and damage in general to the oceanic ecosystem, it would be a nice thing, for a change, if humans would let these marine creatures live without the harmful interventions of mankind. After all, it is their ocean and they were there first.

The Cordell Bank National Marine Sanctuary would protect 101 square nautical miles of ocean area, streching from Point Reyes, Calif. to the Gulf of the Farallones NMS. These waters support a diverse and abundant arrey of marine life including many rare and unusual species of invertebrates. There are over 38 varieties of fish and the abundance of marine life provide the food base for 14 species of marine mammals(including the endangered blue and humpback whales) and 47 species of seabirds (including the endangered brown pelican). I feel this fertile marine habitat deserves protection.

The most important regulations imposed would ban the discharge of oil and other hazardous materials to the sanctuary (preventing ocean dumping and similar pollution) ; and deliberate removal or damage to benthic organisms, with exceptions provided for research or educational purposes.

As of now the proposed draft excludes offshore oil and gas exploration and develpoment from only a small core area of the Cordell Bank. The sanctuary is very vulnerable to damage from these activities. I feel that the sanctuary regulations should be strengthened by prohibiting any offshore oil and gas exploration and development within the entire sanctuary boundary. I support strongly the preferred alternative (Alternative #2;Boundary Alternative #2) to designate this sanctuary and protect its fragile marine ecosystem from adverse human activities.

Thank you for your time, and I hope that you will support the Cordell Bank National Marine Sanctuary. Please send response.

Sincerely, Nicole Nicola

Concerned Citizen
Nicole L. Nicola
1816 62nd St.
Berkeley, CA 94703

1. See Generic Response B.

2. See Generic Response A.

M. L. Nunes
2046 Leese Lane
Novato, CA 94945
Oct 10, 1987

Ms. Allin,

I am writing this letter to you in regards to the designation of Cordell Banks, CA, as a National Marine Sanctusry. I feel that it is imperative 1 that the area boundary #1 be established for the protection of this very unique and pristine area. I wish to express my adamant desire the the entire area have a ban on all hydrocarbon activity. I cannot emphasize 2 enough the importance of the ban. One only needs to see some of the photographs and video of the underwater area to see how fragile this area is, and see how detrimental to the area that would be possible should hydrocarbon activity be allowed. I must insist that as a concerned American citizen, this area receive the entire support you can give it in this direction. I will do everything in my power to see that this area be protected. A great number of my friends and relatives feel the same way. 3 We completely support the Area Designation Boundary No. 1, and a ban on all hydrocarbon activity, and further request that additional funds for on site monitoring, and that provisions for enforcing the regulations 4 be ammended to include a ban on all contact with the shallow ridges (such as anchoring). We <u>will</u> do all that we can to fight for these recommendations and additional funding as necessary to preserve this beautiful area. Thank you.

Sincerely,

Maria L. Nunes

1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response G.

4. See Generic Response D.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Diane L Peterson
200 Posada del Sol
Novato CA 94949

1. See Generic Response A.

2. See Generic Response B.

1262 Clayton St.
San Francisco
CA 94114
Sept. 27, 1987

Ms. Vickie Allin
Marine & Estuarine Management
Ocean & Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Ave. NW
Washington, D. C. 20235

Dear Ms. Allin,

I write to express my support for the designation of Cordell Bank as a National Marine Sanctuary, and for Boundary Alternative #2. I hope the regulations governing the proposed sanctuary will include a prohibition on any off-shore oil and gas exploration and development. This valuable - and vulnerable - area should have complete protection.

Yours sincerely,
Joan Phelan

1. See Generic Response A.

2. See Generic Response B.

411 Pine St
Mill Valley,
Ca 94941
Oct 3, 1987

Vicke Allen,
Acting Chief,
Marine Estuarine Management Div.
Office of Ocean & Coastal Resource Management
National Ocean Service/NOAA,
Washington DC 20235.

Dear Ms. Allen.

We support adding Cordell Bank to the list of seven marine sanctuaries. The area is home to marine mammals & supports a wealth of under water life. It also is on the migratory path of the California Gray whale.

No Response Necessary.

Sincerely,

Elaine M[illegible]
& Jerom[illegible]

RECEIVED
OCT [illegible] PM

September 28, 1987

Ms. Vicki Allin, Acting Chief
Marine and Esturine Management Division
Office of Ocean and Coastal Resource Management
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

1981 OCT -6 A 8:16
EXECUTIVE SECRETARIAT
DEPARTMENT OF COMMERCE

Re: Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

I am writing to comment on the draft environmental impact statement, draft management plan and proposed rule for the Cordell Bank National Marine Sanctuary. I would like to express my strong support for Alternative #2, Boundary Alternative #2 to protect this sanctuary and its fragile marine values.

1

It seems pixilated to designate an area as a marine sanctuary and not ban oil drilling and ocean dumping right up front. The recent spill in the Channel Islands only serves to illustrate our inability to deal with even a small incident. Sanctuary regulations should be strengthened to prohibit any off-shore oil and gas exploration and developement within the entire sanctuary boundary.

2

Why have a sanctuary at all if it is not going to protect natural resources? The Cordell Bank and surrounding waters constitute a vigorous ecological community and should be allowed to flourish unchanged except by Mother Nature.

Sincerely yours,

Karol Raymer

Ms. Karol Raymer
950 Vernal Avenue
Mill Valley, California 94941

KR/htw
cc: Mr. Edward Wilczynski
The Honorable C. William Verity, Jr.
Senator Alan Cranston
Senator Pete Wilson
Congresswoman Barbara Boxer

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

LINDA REIK
NOVATO, CA

1. See Generic Response A.

2. See Generic Response B.

RECEIVED

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

October 9, 1987

Dear Ms. Allin,

1, 2 I am writing to express my strong support for creation of the Cordell Bank National Marine Sanctuary. Please support "Boundary Alternative #1". Please also include a ban from the start on offshore oil drilling in this sanctuary.

This very rich area of marine life deserves the very stiffest protection we can provide. Thank you for your consideration.

Sincerely,

Martha L. Roberts

Martha L. Roberts
978 Santa Ana
Santa Rosa, CA 95404

cc: Mr. Edward Wilcynski, U.S. Department of Commerce

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil
2 drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Joyce Rodoni

Joyce Rodoni
Pt. Reyes, CA

1. See Generic Response A.

2. See Generic Response B.

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY

2555 Leavenworth
San Francisco, CA 94133
NOV 28 P 1:31
September 25, 1987

709146

Ms. Vickie Allin
Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service / NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Re: Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

1 2 With respect to the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary, I wish to go on record as strongly supporting Alternative #2 and Boundary Alternative #2 designating this area as a sanctuary and preserving it from the effects of drilling, dumping and other harmful interference so that we and our children can benefit from its unique opportunities to preserve a marine ecology, study that ecology, and simply take pleasure in observing its unimpaired continuity. I further urge that the sanctuary regulations be strengthened to promote these ends by prohibiting any off-shore oil and gas exploration and development within the sanctuary boundary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Marie L. Roehm

Marie L. Roehm

cc: Mr. Edward Wilczynski
Acting Chief
Ecology and Conservation Division
Room 6814
U. S. Department of Commerce
Washington, D.C. 20230

The Honorable C. William Verity, Jr.
Secretary of Commerce
U. S. Department of Commerce
Washington, D.C. 20230

Senator Alan Cranston
Senator Pete Wilson

J. Hawkeye Rondeau
P. O. Box 620458
Woodside, Ca. 94062
October 10, 1987
408-374-3027

Ms. Vickie Allen, Acting Chief
Marine and Estuarine Management Division
National Oceanic and Atmospheric Administration
1825 Connecticut Avenue, N. W.
Washington, D. C. 20235

Dear Ms Allin,

After a thorough review of the Draft Environmental Impact Statement and Management Plan for the proposed Cordell Bank National Marine Sanctuary, I have concluded that the Plan has the following shortcomings.

1. On page 42 the possibility of limiting future OCS leasing to within one mile of the fifty-fathom isobath seems terribly short sighted especially in view of recent oil spill events (i.e., Puerto Rican, Apex Houston) in the nearby Gulf of the Farallones Sanctuary as well as the even more recent spill from the Pac Baroness in the Channel Islands NMS area. I feel that a much larger buffer zone is necessary because, as we all learned so well in October and November of 1984, very few spills evolve as predicted nor can they be controlled despite the best possible "contingency plan". 1

If this provision cannot be established at this time, then at the very least, a complete ban on all hydrocarbon activities within the Boundary Alternative #1 should be contained in the sanctuary designation document. 2

2. The preferred Management Alternative #2, despite the obvious economic considerations, is not adequate to provide for the needs of the vast benthic flora and fauna found at the proposed sanctuary area. The present management and research plans for the Gulf of the Farallones Sanctuary has so far devoted very little time and money for research of invertebrate phenomena; why should one suppose that they will now be capable of assuming vast new responsibilities in this arena? Perhaps a new staff specialist position should be created to fill this void in the proposed "Tandem" Sanctuary Management-Administration Plan. 3 4

In addition, because of my exposure to the rare and vast biotic assemblage at the Cordell Banks, I would also urge you to designate additional funds for on-site monitoring and amend the enforcement provisions to include a ban on all mooring contacts with the shallowest ridges where benthic organisms are found in their greatest densities, as noted on page 22. 5

J. Hawkeye Rondeau, Ph.D.

Hawkeye

1. See Generic Response A.

2. See Generic Response B.

3. NOAA has spent the majority of its research resources on invertebrate research on Cordell Bank. An excellent review of the benthic flora and fauna has been provided by NOAA sponsored research on the Bank and is documented in published research reports and articles. NOAA intends to use this baseline information to better understand the structure and functions of the Cordell and Gulf of Farallones ecosystems for future management purposes.

4. See Generic Response G.

5. See Generic Response D.

Dear Mr. Allen: 12/4/81

Please support the creation of the Cordell Bank Natl Marine Sanctuary.

Also ask for support of Boundary Alternative #1 and inclusion of a ban on all offshore drilling, leasing, exploration, + development within the Cordell Bank Sanctuary from the beginning.

Sincerely,
Gayle L. Sandrock
1123 Meadowsweet
Corte Madera, CA 94925

1. See Generic Response A.

2. See Generic Response B.

Gayle Sanfilippo
3498 Buckingham Drive
San Jose, Ca 95118

October 1, 1987

Ms. Vickie Allen, Acting Chief
Marine and Estuarine Mgmt. Div.
Office of Ocean and Coastal Resource Mgmt.
National Ocean Service/NOAA
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Re: Cordell Bank National Marine Sanctuary

Dear Ms. Allen:

I wish to comment on the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary.

1 I strongly support the preferred alternative (Alternative #2; Boundary Alternative #2) to designate this sanctuary and protect its fragile marine values.

2 I respectfully request, however, that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundary.

Thank you for your attention on this issue.

Sincerely,
Gayle Sanfilippo

cc: Mr. Edward Wilczynski
Honorable C. William Verity, Jr.
Senator Alan Cranston
Senator Pete Wilson
Congressman Norman Mineta

1. See Generic Response A.

2. See Generic Response B.

Sept. 27, 1987
1344 Clayton St
San Francisco
Ca. 94114

Ms. Nicklie Allin
Acting chief Marine + Estuarian Mgmt.
Nat'l. Ocean Service
1825 Connecticut Ave N.W.
Washington, D.C.

Dear Chief Allin:

1 [I am writing to express my support
of Alternative #2 to designate a sanctuary
of Cordell Bank Nat'l. Marine area to

2 [protect its fragile marine values, and
to prohibit any oil-shore oil and gas
exploration.

Sincerely,
Laurette Schorcht

Laurette Schorcht
1344 Clayton
San Francisco, CA 94114

1. See Generic Response A.

2. See Generic Response B.

1987 OCT -6 A 8:15
OFFICE OF THE SECRETARIAT

September 29, 1987

Ms. Vickie Allin, Acting Chief
Marine And Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, DC 20230

Re: Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

1 2 I wish to express my strong support for the preferred alternative (Alternative #2: Boundary Alternative #2. I am opposed to any off-shore oil and gas exploration and development within the whole sanctuary boundary.

The Cordell Bank National Marine Sanctuary supports a diverse and abundant variety of marine creatures. They should be given all the protection possible to assist them in their survival.

Sincerely,

(Miss) Dawne Schulte
354 Park Street
San Francisco, CA 94110

cc to: Mr. Edward Wilczynski, The Honorable C. William Verity, Jr.,
Senator Alan Cranston, Senator Pete Wilson and the Honorable Nancy Pelosi

1. See Generic Response A.

2. See Generic Response B.

Oct. 6, 1987
7696 Ole St., #2
San Francisco
Ca, 94117

Ms. Vickie Allen, Acting Chief
Marine and Estuarine Management
National Ocean Service
1825 Connecticut Ave, N.W.
Washington, DC, 20235

Dear Ms. Allen:

I'm writing this regarding the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary. I'm strongly in favor of Alternative #2, Boundary Alternative #2, to designate this a sanctuary. However, I'm requesting that this be strengthened by prohibiting any off-shore oil and gas exploration and development within the

1. See Generic Response A.

2. See Generic Response B.

whole sanctuary boundary.

Thank you for any attention you give this.

Sincerely,

Clint Lester

LEW STARK, GENERAL CONTRACTOR
LIC. NO. 327016
11293 ROOSEVELT DRIVE GRASS VALLEY, CALIF. 95945
PHONE (916) 273-4150

DEAR MS. ALLIN,

I'M WRITING IN REGARD TO THE PROPOSED CORDELL BANK NATIONAL MARINE SANCTUARY OFF THE COAST OF NORTHERN CALIFORNIA. I HAVE BEEN A MEMBER OF THE EXPEDITIONS THAT HAVE DIVED AND EXPLORED CORDELL BANK AND AFTER PERSONALLY SEEING IT, I AM CONVINCED THAT THIS PIECE OF OUR PLANET SHOULD BE PROTECTED.

"THEY JUST DON'T MAKE PLACES LIKE THIS ANY MORE," AND IF SOME SORT OF PROTECTIVE STATUS ISN'T ESTABLISHED AND ENFORCED ON AND AROUND THE BANK, I BELIEVE WE COULD SEE DAMAGE TO THE ECOLOGICAL STRUCTURE OF OF THIS UNDERWATER ISLAND AND WATERS AROUND IT.

CORDELL BANK HAS ALWAYS HAD A GREAT REPUTATION OF PRODUCTIVE FISHING. BUT LIKE ANYTHING ELSE, " IF YOU CALL SOMEPLACE PARADISE, YOU CAN KISS IT GOOD-BYE." I DON'T KNOW IF SPORT FISHING ITSELF, AT ITS PRESENT INTENSITY, COULD THREATEN A HEALTHY FISH POPULATION ON THE BANK, BUT AS MORE PRIVATE AND CHARTER FISHING BOATS DISCOVER THIS "FISHING PARADISE THE CASUAL ACT OF ANCHORING COULD EVENTUALLY CAUSE SOME CHANGES TO THE MARINE GROWTH ON THE BOTTOM

THE RELATIVELY SHALLOW RIDGES OF CORDELL BANK IS SO ABUNDANT WITH MARINE LIFE THAT THERE EXISTS A BATTLE FOR "REAL ESTATE" AMONG THE INVERTEBRATE SEA LIFE. LIKE A CLIMAX CONIFER FOREST, TIME HAS ALLOWED CERTAIN SLOWER GROWING SPECIES TO DOMINATE AND PROVIDE THE PROPER BALANCE OF MARINE LIFE TO SUPPORT A HEALTHY FISH ENVIRONMENT.

BUT AS EVERY ANCHOR IS PULLED FROM THE BOTTOM ALONG WITH IT GOES SOME OF THIS DELICATE LIFE THAT TOOK SO LONG TO ESTABLISH. SO IN THIS RESPECT ANCHORING FOR THE BENIFIT OF SPORT FISHING SHOULD NOT BE ALLOWED, AND COMMERCIAL FISHING WITH THEIR DRAG NETS, SHOULD BE BANNED IN THE PROPOSED SANCTUARY.

I'M ALSO AWARE THAT THERE IS A DECISION TO TO BE MADE ON THE BOUNDARIES OF PROPOSED MARINE SANCTUARY. BOUNDARY ALTERNATIVE # 1 IS THE ONLY CHOICE TO INSURE THAT CORDELL BANK HAS A BUFFER ZONE TO PROTECT IT FROM THE PRESSURES OF OIL AND GAS EXPLORATION AND DEVELOPMENT.

ALTHOUGH THIS TINY PIECE OF OCEAN BOTTOM WILL REMAIN INVISIBLE TO MOST OF MANKIND, IT'S ALTERATION OR DESTRUCTION COULD BE SEEN IN THE FEWER NUMBERS OF FISH CAUGHT, OR THE FEWER SEE MAMMALS AND BIRDS IN AROUND THE AREA, LET ALONE THE BEATY OF THE BOTTOM WOULD DISAPPEAR.

SINCERELY

LEW STARK

1. See Generic Response D.
2. See Generic Response I.
3. See Generic Response A
4. See Generic Response B.

Lori Talbot
20 Holcomb Ct.
Walnut Creek, Ca. 94596

703560

Mr. C. William Verity, Jr., Secretary Designe
United States Department of Commerce
Washington, D. C. 20230

October 8, 1987

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY
1987 OCT 14 P 3:38

Dear Mr. C. William Verity, Jr.,

1 I would like to express my support for Boundary Alternative #1.
2 I desire a complete and total ban an ALL hydrocarbon activity within the sanctuary boundary, and insist that these provisions be included in the sanctuary designation document AT THE OUTSET.

3 I recommend that additional funds be designated for supporting on-site monitoring, that provisions for enforcing the regulations
4 be amended to include a ban on all contact with the shallow ridges (such as anchoring).

I have seen this beautiful place with my own eyes (yes, as a diver!) and believe it to be an extraordinarily rich benthic community of life; the home of very rare and unusual species of hydrocorals, sponges, scallops, and snails, with an abundance of fish, and other (some endangered) marine life.

I strongly support Sanctuary status for the Cordell Bank area, and recommend that the OCS ban be extended to include the whole Sanctuary, not just the core area.

Please help us prevent the offshore oil and gas exploration and development that would change, destroy, and mutilate any of the Cordell Bank Marine Sanctuary.

Sincerely,

Lori Talbot

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

CORDELL BANK EXPEDITION

LORI TALBOT
Diver, Publications
(415) 930-7227

CORDELL BANK EXPEDITIONS
4295 WALNUT BLVD., WALNUT CREEK CA 94596

Erica Tanner
414 William Ave.
Larkspur, CA. 94939
October 2, 1987

Ms. Vickie Allin, Acting Chief
Marine & Estuarine Mgmt. Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Ave., N.W.
Washington, DC 20235

Dear Ms.Allin:

1 I am writing in support of the creation of the Cordell Bank National Marine Sanctuary. I feel that "Boundry Alternative #1" is the only one that would effectively protect the area from possible off-shore oil drilling.

2 I am strongly against the extension of oil drilling off the California coast in general, but in particular, I am opposed to any exploration or development within the Cordell Sanctuary.

I urge you to do what you can to prevent further oil exploration in this area and to create the Cordell Sanctuary.

Sincerely,

Erica Tanner

Erica Tanner

1. See Generic Response A.

2. See Generic Response B.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the *CORDELL BANK MARINE SANCTUARY*. *I am aware, as are many people,* of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Rick Tanner
20 MANNA WAY
Point Reyes CA
94956

Richard Tanner

OCT. 8, 1987

MS. VICKIE ALLIN, ACTING CHIEF
MARINE ESTUARINE MGT. DIV.

DEAR MS ALLIN,

THIS NOTE IS IN SUPPORT OF CREATING THE PROPOSED CORDELL BANK NATIONAL MARINE SANCTUARY, WOULD YOU PLEASE CONSIDER THIS ?

FROM MY RESEARCH THE EVIDENCE SEEMS TO SAY THAT IT IS IMPARATIVE TO PRESERVE AS MANY NATURALLY BALANCED ECOSYSTEMS AS POSSIBLE FOR OUR AND OUR CHILDRENS' AND THE EARTHS' BEST HEALTH AND HERITAGE. CONSIDER:

- IT IS WELL KNOWN THAT FOSSIL FUELS WILL BE TOO EXPENSIVE TO EXTRACT IN 15 YEARS (A VERY SHORT TIME AWAY.!) MAKING FURTHER DEVELOPEMENT OF NATURALLY BALANCED ENERGY SOURCES (LIKE SOLAR, GEOTHERMAL, PEDAL-VEHICLES, ETC) MORE IMPORTANT THAN ANY FOSSIL FUEL EXPLORATION.
- THE SCIENTIFIC LEARNING AND HUMAN NOURISHMENT FROM OBSERVING A NATURALLY BALANCED ENVIRONMENT IS PRICELESS - ONCE THAT BALANCE IS DISRUPTED IT ALMOST ALWAYS DETERIORATES FOR GENERATIONS TO COME.
- ANY ECONOMIC GAINS THAT MIGHT BE HAD FROM THE CORDELL BANK CERTAINLY WOULD NOT OFFSET THE LONG TERM "DEEP ECOLOGY" ECONOMICAL LOSS. (SEE F. CAPRA - GREEN POLITICS, A BOOK).

(OVER)

1. See Generic Response B.

THANK YOU FOR YOUR CAREFUL RESEARCH ON THIS ISSUE, I THINK YOU WOULD FIND IT VALUABLE ALSO TO CREATE A CANDELL BANK NATIONAL MARINE SANCTUARY. I HOPE THIS NOTE FINDS YOU IN GOOD HEALTH.

SINCERELY

Peter Temple-Denali

PETER TEMPLE-DENALI
P.O. BOX 91
ALBION, CA 95410

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 2 I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

1. See Generic Response A.

2. See Generic Response B.

Sincerely,

Kristen Thomas
GREENBAE, CA.

Bruce E. Walker
4333 Holden St.
Emeryville
CA 94608

709573

October 9,1987

1981 OCT 15 A 9:32

Ms. Vickie Allin
Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Ave,
N.W. Washington, D.C. 20235

Re: Comments on the draft enviornmental impact statement, draft management plan, and proposed rule for Cordell Bank National Marine Sanctuary.

Dear Ms. Allin:

1 I would like to express my strong, but qualified, support for the preferred alternative (Alternative #2) to designate this sanctuary, and protect it's
2 fragile marine values. I would however, request that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development within the whole sanctuary boundry.

I am a concerned citizen and a bird watcher. I know that this very unique area of the Pacific Ocean should not be invaded by the oil and gas companies for the purpose of exploration or drilling for profit. Please protect this unique sanctuary with all the power of your authority.

Sincere thanks,

Bruce E. Walker

c.c.
Mr. Edward Wilczynski
The Honorable C. William Verity Jr
Senator Alan Cranston
Senator Pete Wilson
Congressman Ronald Dellums

1. See Generic Response A.

2. See Generic Response B.

September 29, 1987

Ms. Vicki Allin
Acting Chief, Marine & Estuary Management Division
Office of Coastal Resource Management
National Ocean Service
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Re: Designation of Cordell Bank National Marine Sanctuary

Dear Ms. Allin,

I am writing to comment on the draft environment impact statement, managment plan and proposed rule for the Cordell Bank Sanctuary. After reading it, I am strongly in favor of the Alternative Two, Boundary Two Alternative which will designate this area a completely protected sanctuary. However, I must urge that stronger measures be added to prohibit oil contamination of this fragile environment. Having studied marine biology in college and having kept abreast of current research in marine biology, I know how devastating oil contamination can be to any area where a delicate balance in a small area exists. Oil exploration and drilling should be completely prohibited from the entire sanctuary area to ensure the safety and continued productivity of the Cordell Bank.

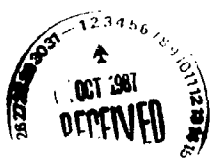
1
2

Yours truly,

Anita L. Velazquez

Anita L. Velazquez
2237 Filbert Street
San Francisco, CA 94123

cc: Edward Wilczynski, U,S. Department of Commerce, Ecology & Conservation Div.
C. William Verity, Jr,, Secretary of Commerce
Senator Alan Cranston, California
Senator Peter Wilson, California



1. See Generic Response A.

2. See Generic Response B.

1416 Parker Dr.
Santa Rosa, CA 95405
October 2, 1987

Vickie Allen, Acting Chief, Marine and Estuarine Management Division, OCRM, National Ocean Service, NOAA, 1825 Connecticut Avenue, N.W., Washington, D.C. 20235

and copy to:

Edward Wilczynski, Acting Chief, Ecology & Conservation Division, U.S. Department of Commerce, Room 6814, Washington DC 20230

Re: Cordell Bank Marine Sanctuary

1 I support the creation of a Cordell Bank national sanctuary, with the broadest area of protection: Alternative 1.

2 And of course, there should be a permanent ban on offshore oil drilling activities. That means no leasing, no exploration, and no development. There are some unique places that are too valuable in their present state for any consideration of alteration. The Cordell Bank is one. Its support of marine life is more than adequate reason to preserve the area in perpetuity.

Sincerely,
Iva Warner
IVA WARNER

1. See Generic Response A.

2. See Generic Response B.

DEBBIE WHITE
Regional Trainer
#808 Longs East L.A. D.C.
128 No. Grand Ave.
Glendora, CA 91740

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/ NOAA
1825 Connecticut Avenue, N. W.
Washington, D. C. 20235
Tel: (202) 673-5122

October 8, 1987

Dear Ms. Allin,

1 I would like to express my support for Boundary Alternative #1.
2 I desire a complete and total ban an ALL hydrocarbon activity within the sanctuary boundary, and insist that these provisions be included in the sanctuary designation document AT THE OUTSET.

3 I recommend that additional funds be designated for supporting on-site monitoring, that provisions for enforcing the regulations
4 be amended to include a ban on all contact with the shallow ridges (such as anchoring).

I have seen this beautiful place in photos and videos, and believe it to be an extraordinarily rich benthic community of life; the home of very rare and unusual species of hydrocorals, sponges, scallops, and snails, with an abundance of fish, and other (some endangered) marine life.

I strongly support Sanctuary status for the Cordell Bank area, and recommend that the OCS ban be extended to include the whole Sanctuary, not just the core area.

Please help us prevent the offshore oil and gas exploration and development that would change, destroy, and mutilate any of the Cordell Bank Marine Sanctuary.

Sincerely,

Debbie White

OCT 1987
RECEIVED

1. See Generic Response A.
2. See Generic Response B.
3. See Generic Response G.
4. See Generic Response D.

October 07, 1987

Ms. Vickie Allin
1825 Connecticut Ave.
Washington D.C. 20235

Dear Ms. Allin,

I would like to express and extend my support for the proposed creation of the CORDELL BANK MARINE SANCTUARY. I am aware, as are many people, of the devastating effects offshore oil drilling would have on the marine life and enviornment.

1 E
2 E

I further support both the formation of BOUNDARY #1 in hopes of proiding the broadest area of protection, and a ban on all offshore oil drilling activity including leasing, exploration and developement within the Cordell Bank Marine Sanctuary.

Sincerely,

Barbara Wishom

Barbara Wishom
NOVATO, CA

1. See Generic Response A.

2. See Generic Response B.

185 Rainier Cir.
Vacaville, CA 95688

October 7, 1987

Ms. Vickie Allin, Acting Chief of the
Marinie and Estuarine Management Division of the
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
Washington, D. C. 20235

Concerning the draft environmental impact statement, draft management plan, and proposed rule for the Cordell Bank National Marine Sanctuary: I strongly support the preferred alternative (Alternative #2; Boundary Alternative #2) to designate this sanctuary and protect its numerous species of marine life. 1

Because of its extraordinary combination of sunlight penetration, nutrients upwellings, and ocean currents, Cordell Bank supports many kinds of marine creatures, ranging from tiny crustaceans to the Blue whales and Humpback whales (both the Blue whale and the Humpback Whale are listed as "endangered" in the federal Endangered Species Act, and are federally protected). Additionally, I respectfully urge that the sanctuary regulations be strengthened by prohibiting any offshore oil and gas exploration and development, and any ocean dumping. 2

Looking forward to your earliest possible reply on this urgent matter, I am

Sincerely,

Tamara Wright

Tamara Wright

cc: Mr. Edward Wilczynski, Acting Chief of Ecology and Conservation Division of the U. S. Department of Commerce; The Honorable C. William Verity, Jr., Secretary of the U. S. Department of Commerce; Senator Alan Cranston; Senator Pete Wilson; The Honorable Vic Fazio, U. S. Congressional Representative

1. See Generic Response A.

2. See Generic Response B.

10-6-87

Dear Mrs. Allin

I would like to let you know that I am in support of the proposed Cordell Bank National Marine Sanctuary. I am in favor of providing the broadest area of protection as

1 [pleted in Boundry Alternative #1 and to provide the healthiest environment for the

2 [proposed sanctuary I would like to see a ban on all off shore drilling activities including leasing exploration & development.

Sincerely

Michael Wong

1. See Generic Response A.

2. See Generic Response B.

110 High[illegible]
Mill Valley, CA 94941
October 1, 1987

Vickie Allin
Acting Chief, Marin Estuarine Mng. Division
Office of Ocean and Coastal R[illegible] Mng., NOAA
Washington, D. C. 20235

Dear Vickie Allin:

On behalf of the pre-ent fishing industry - suffering acute problems between warming trends which affect the Canadian spawning pattern (currently three weeks late and circling in the ocean), the problems of United States and particularly California spawning waters (the excessive timbering which reduces viable streams, the ramaged fires which also will affect streams' sedimentation and the foliage (stream temperatures) - assistance is needed.

It is critical that the Cordell Bank, the 9 x 5 miles area and other offshore experimental drilling sites near the spawning areas on the West Coast - be protected.

[You now have an opportunity to prohibit drilling and to specifically make a sanctuary of the Cordell bank for the protection for marine life, profuction of marine species and to protect this long term resource - far more important than the oil exploratory "investment" is this food chanin investment.....

I urge you to establish the Cordell Bank Sanctuary - and to examine the need for sanctuaries along the coast and to re-evaluate the 5 year oil exploration plan advanced by Secretary Donald Hodel.

Thank you and sincerely,

Margaret Kettunen Zegart

Margaret Kettunen Zegart

1. See Generic Response B.

Miss Manon Yount
1601 Broadway #6
Alameda, Ca. 94501

October 2, 1987

Ms. Vickie Allin
Acting Chief
Marine + Estuarine
Management Div.

Dear Ms. Allin,

1 Please support the establishment of the Cordell Bank National Sanctuary and the Boundary Alternative No. 2. The many species of marine life and birds need this protection to survive.

2 To this same end, the ban on offshore oil exploration and development within the whole boundary of the Sanctuary is also essential.

Thank you for your consideration of these matters.

Sincerely,

Manon Yount

OCT 1987
RECEIVED

1. See Generic Response A.

2. See Generic Response B.

ORGANIZATION COMMENTS

ANIMAL PROTECTION INSTITUTE OF AMERICA

6130 Freeport Boulevard
P.O. Box 22505
Sacramento, CA 95822
(916) 422-1921
TWX 910 367 2375 API SAC

October 9, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management,
National Ocean Service, NOAA
1825 Connecticut Ave, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

1 On behalf of 160,000 members of the Animal Protection Institute of America, I wish to go on record with our strong support for the Preferred Alternative (Alternative #2, Boundary Alternative #2) for the Cordell Bank National Marine Sanctuary.

2 We feel the sanctuary regulations need to be strengthened by including the prohibition of any offshore oil and gas exploration and development within the sanctuary boundary.

Such areas are notable for their vast richness and biodiversity. Along the Pacific Coast, there are relatively few of these offshore seamounts which are so important as areas of nutrient upwelling. The variety and numbers of seabirds and marine mammals found there highlights the importance of keeping these special areas free from the threat of pollution.

Thank you for allowing us the opportunity to comment on the Cordell Bank National Marine Sanctuary. It is our hope that areas like this will remain pristine.

FOR THE ANIMAL PROTECTION INSTITUTE OF AMERICA

Sincerely,

Bruce Webb

Bruce Webb
Director, Program Services
BW/bms

1. See Generic Response A.

2. See Generic Response B.

UNITED ANIMAL NATIONS

Foreign Offices:
GENEVA, SWITZERLAND
STUTTGART, GERMANY
TORONTO, ONTARIO

Chairman of the Board, KENNETH E. GUERRERO. Vice Chairman, DUF FISCHER. Secretary, LUANA GRIMLEY. Directors: COLETTE C. FAE GWENDOLYN MAY, ROWLAND MITCHELL, RICHARD WEMPE. Honorary Vice-President: KIM NOVAK. National Advisory Board: ROBERT BROWN, Fa Fairmo, MERRILL A. BURT, D.V.M., Veterinary Medicine, NED BUYUKMIHCI, V.M.D., Institutional Veterinary Medicine, DONALD E. DOYLE, M.D., Me Science Advisor, BRUCE MAX FELDMANN, D.V.M., Veterinary Medicine and Pet Population, MARJORIE GUERRERO, Humane Education, MRS. KA HARRISON, Northwest Regional Activities, SHIRLEY McGREAL, PH.D., Primate Specialist, JOYCE S.A. TISCHLER, J.D., Animal Rights and the Law, ANN VOL Promotions and Auxiliaries, MRS. RALPH YOUNGDALE, Publicity and Promotions. Foreign Advisors: ANGUS O. McLAREN, Transvaal, South Africa, MRS. AI MUMFORD, Vancouver, Canada, MICHAELA DENIS, Nairobi, Kenya. In Memoriam: VELMA "Wild Horse Annie" JOHNSTON, HARRY DEARINGER, A FRANK V. BRACH, CHARLOTTE L.B. PARKS, CLAUDE, COUNTESS OF KINNOULL

API IS A NONPROFIT TAX-EXEMPT ORGANIZATION
ALL CONTRIBUTIONS ARE DEDUCTIBLE FOR INCOME AND ESTATE TAX PURPOSES

October 6, 1987

To Honorable Public Officials:

We, the undersigned members and friends of the Barbary Coast Dive Club of San Francisco wish our voices to be heard regarding the proposed Cordell Bank National Marine Sanctuary.

1 We unanimously request Sanctuary status for the Cordell Bank area and support the preferred alternative number one, boundary number one (from the Draft Environmental Impact Statement and Draft Designation Document).

2 We also wholeheartedly request a ban of offshore oil and gas exploration and development throughout this entire boundary of the Sanctuary as with our other two California National Marine Sanctuaries.

Sincerely,
The Barbary Coast Divers
San Francisco, California

Cal Stroop - president
Karla Stroop
Bruce A Chevy V. President
Patricia M. Kreuer - Editor
Carol A. Reed
Lisa Basinger
Tom Turner
Esther Turner
Jon McLain
Pete D
Kathe Jane Davis
Stephen R Nagy

CORRESPONDENT:
TOM TURNER
1403 MITCHELL WAY
REDWOOD CITY, CA 94061

1. See Generic Response A.

2. See Generic Response B.

BODEGA BAY AREA CHAMBER OF COMMERCE

• BODEGA BAY
• BODEGA
• VALLEY FORD

P.O. BOX 146
BODEGA BAY, CALIFORNIA 94923
PHONE: 875-3422

October 9, 1987

Phil Williams
Project Manager
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service, NOAA
1825 Connecticut Avenue, NW, Suite 714
Washington, DC 20235

Dear Mr. Williams:

The Bodega Bay Area Chamber of Commerce, at their meeting of October 7, 1987, voted unanimously to go on record as approving of the plan to create Cordell Bank as a National Marine Sanctuary.

The Bodega Bay area is vitally interested in this project and will extend support to aid in its development.

Very truly yours,

Ken Cherrick

Ken Cherrick
President

KC:is

1. No Response Necessary.

California Academy of Sciences

Natural History Museum & Aquarium

Department of Ornithology and Mammalogy

9 October 1987

Vickie Allin
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Conneticutt Avenue, N. W.
Washington, D. C. 20235

Dear Ms. Allin

I am writing to you to comment on the Draft Environmental Impact Statement for the proposed Cordell Bank National Marine Sanctuary. I have been active in research, primarily on marine mammals, in the Cordell Bank - Gulf of the Farallones region since 1976. It is based on my experience in this area that I make the following comments.

1 Section IIB (2c) states that 14 species of marine mammals are known to frequent the waters of Cordell Bank. This was based on information presented by Webber and Cooper (1983). However, that number represents less than half of the species either sighted or found stranded in the Cordell Bank-Gulf of the Farallones National Marine Sanctuary region. Based on data collected by Farallon Research Associates between 1982 and 1987 the total number of marine mammals sighted or found stranded in this region is 32. I am enclosing a list of the species.

2 The area between the North Farallon Islands and Cordell Bank is heavily utilized by baleen whales, in particular blue and humpback whales, (Both endangered species) for feeding. In previous years we have seen large numbers of humpback and blue whales in the vicinity of the Farallon Islands. This year we have seen a northward shift of the majority of the whales to the area between the North Farallon Islands and just north of Cordell Bank. There seems to be considerable movement of whales between the current Gulf of the Farallones National Marine Sanctuary and the proposed Cordell Bank National Marine Sanctuary. It is for these reasons that I strongly recommend that Boundry Alternative #1 be chosen.

1. See Generic Response A.

2. See Generic Response B.

Fur seal and sea otters depend almost entirely upon their fur to insulate them from the cold North Pacific waters. Fouling of the fur of either species would, most likely, result in death. Northern fur seals are regularly sighted in the Gulf of the Farallones and/or Cordell Bank and the California sea otter has recently been recorded in the Gulg of the Farallones. Sea birds depend on a layer of air trapped between their feathers for thermoregulation. Matting of the feathers, like the matting of the fur of marine mammals, would destroy the thermoregulating capacity of the feathers, and possibly result in the death of the birds. The Southeast Farallon Island is the largest sea bird breeding site on the west coast of North America, south of Alaska, and some of these birds may utilize the area between the Farallon Islands and Cordell Bank (inclusive) for feeding.

3 As a result of the utilization of this area by both marine mammals and sea birds, I feel that a complete and total ban on all hydrocarbon activity within the sanctuary boundries would not only be appropriate, but also advisable. In order to assure that the regulations are enforced
4 I reccommend that funds be allocated to provide continual monitoring in the sanctuary.

5 Finally, in order to protect the rare species of animals that are found on the ridges of the bank, I suggest that there be a ban on all contact with the ridges (such as anchoring).

I have been fortunate enough to experience, first-hand, the richness of Cordell Bank and the surrounding area. I feel it is our obligation to preserve this area for ourselves and for future generations. Thank you for giving me the opportunity to help in your efforts to preserve this area.

Sincerely yours,

Isidore D. Szczepaniak

cc: E. Wilczynski
R. Schmieder
C. Verity

3. Research into the number and distribution of marine mammals is an ongoing and continuous project. Since the formulation of the DEIS/MP new data has been received, specifically regarding whale sightings. NOAA will incorporate this new data and the provided table into the Sanctuary data base.

4. See Generic Response G.

5. See Generic Response D.

Marine mammals sighted or found stranded in the vicinity of Cordell Bank and the Gulf of the Farallones, California, 1982-1987.

Balaena glacialis	right whale	(Si)
Eschrichtius robustus	gray whale	(B)
Balaenoptera acutorostrata	minke whale	(B)
Balaenoptera borealis	sei whale	(Si)
Balaenoptera physalus	fin whale	(Si)
Balaenoptera musculus	blue whale	(B)
Megaptera novaeangliae	humpback whale	(B)
Berardius bairdii	Baird's beaked whale	(Si)
Ziphius cavirostris	Cuvier's beaked whale	(Si)
Mesoplodon densirostris	dense-beaked whale	(St)
Mesoplodon carlhubbsi	Hubb's beaked whale	(St)
Physeter macrocephalus	sperm whale	(B)
Kogia breviceps	pygmy sperm whale	(St)
Kogia simus	dwarf sperm whale	(St)
Delphinus delphis	common dolphin	(B)
Steno bredanensis	rough-toothed dolphin	(St)
Stenella coeruleoalba	striped dolphin	(St)
Tursiops truncatus	bottlenose dolphin	(B)
Orcinus orca	killer whale	(B)
Grampus griseus	Risso's dolphin	(B)
Globicephala macrorhynchus	pilot whale	(B)
Lagenorhynchus obliquides	Pacific white-sided dolphin	(B)
Lissodelphis borealis	northern right whale dolphin	(B)
Phocoena phocoena	harbor porpoise	(B)
Phocoenoides dalli	Dall's porpoise	(B)
Zalophus californianus	California sea lion	(B)
Eumetopius jubatus	northern sea lion	(B)
Callorhinus ursinus	northern fur seal	(B)
Arctocephalus townsendi	Guadalupe fur seal	(St)
Phoca vitulina	harbor seal	(B)
Mirounga angustirostris	elephant seal	(B)
Enhydra lutris	sea otter	(B)

Si - sighting of species
St - stranding of species
B - both sighting and stranding of species

I. Szczepaniak
Farallon Research Associates
San Francisco, CA

CALIFORNIA MARINE MAMMAL CENTER

Marin Headlands
Golden Gate National Recreation Area
Sausalito, California 94965
(415) 331-SEAL

October 10, 1987

Vickie Allin, Acting Chief
Marine Estuarine Management Division
Office of Ocean Service/NOAA
1825 Connecticut, Avenue, NW
Washington, DC 20235

Dear Ms. Allin:

1 We are writing in response to the draft EIS on the proposed Cordell Banks National Marine Sanctury plan. We support the proposal for Cordell Banks to be designated as a marine sanctuary. We support area #1 as its proposed boundaries. By supporting the proposed boundary #1, we endorse the connection this will make between the Cordell Banks Sanctuary and the Gulf of the Farallones Marine Sanctuary.

2 The current EIS does not remove Cordell Banks from future hydrocarbon exploration or development. We highly recommend that from the very onset, that the proposed sanctuary be designated as a no activity zone. Even though this area is not currently under any proposed leasing for oil exploration, future protection of this area is crucial.

3 Funding should be included in the EIS for monitoring and protection of the sanctuary. A patrol/monitor boat should be appropriated for this area, aside from the one assigned to the Gulf of the Farallones Marine Sanctuary. An oil clean-up vessel and equipment should be maintained in Bodega Bay, instead of being based within San Francisco Bay. Cordell Banks is so far from San Francisco that if a spill should occur during a storm or foggy day, it could potentially be days before a vessel based in San Francisco could reach the spill to even begin any clean-up efforts.

Cordell Banks is an area rich in invertebrate life, as well as marine mammals, seabirds, and fish. This is an area of special national significance. We whole heartedly support this area (proposed area #1) to be designated as a marine sanctuary and awarded the protection that it deserves.

Sincerely,

Jan Roletto
Curator

Peigin Barrett
Executive Director

1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response G.

Santa Rosa, Calif.
September, 26, 1987

Ms. Vicki Allen, Acting Chief
Marine & Estuarine Management Division
OCRM
National Ocean Service/NOAA
1825 Connecticutt Avenue, N.W.
Washington, DC 20235

Dear Ms. Allen:

As Co-chair of COAAST (Californians Organized to Acquire Access to State Tidelands) I'm writing to you to indicate how important it is that NOAA be supported in its efforts to create a marine sanctuary off the northern coast of California to protect the the fish, mammals and seabirds of the Cordell Banks area. The sanctuary is particularly necessary because the Cordell Bank is the known habitat for two species of the endangered whale, the blue whale and the humpback whale. The Brown Pelican and the wonderous short-tailed albatross have been observed near the Banks.

The Banks, as you undoubtedly know, are a rich source of protein for the consumers of the nation. The Federal government should normally be thinking along lines that would lead to their protection and enhancement. The fruits of the sea in that area are a Federal treasure. Their harvest provides jobs and spending capital for hundreds, maybe thousands of people, a fact that should not be forgotten when considerations are advanced by oil companies for exploration and production permits. Everything seems to have its time. It's time for stringent protection of the California Coast lest we loose its productive environment forever. Please do what you can to support the establishment of the proposed marine sanctuary. 1

In conclusion, allow me to say that COAAST is twenty years old this year. We are unique in our origin and determined in our cause. In summary COAAST supports the Sanctuary movement, opposes further seismic exploration and drilling within boundary # 1 of the proposed Cordell Bank National Marine Sanctuary. 2

We thank you for your kind attention.

Sincerely,

Charles A. Rhinehart

C. H. Rhinehart
Co-chair, COAAST

1. See Generic Response B.

2. See Generic Response A.

Conservation Call, Inc.
ESTABLISHED 1969
P. O. Box 87 Sea Ranch, CA 95497 (707) 785-2248

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7 October 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20735

1981 OCT 14 P 2:30
EXECUTIVE CORRESPONDENCE MANAGEMENT

Dear Ms. Allin:

On behalf of our members, we endorse, with some exceptions, the Draft Environmental Impact Statement for the Cordell Bank National Marine Sanctuary.

1 We support Boundary Alternative 1, basically because its size will offer greater protection for the Bank. A strict prohibition against any offshore oil and gas exploration and development must be included. The
2 The preferred Alternative provisions on offshore drilling are so weak they offer no real protection.

While I was writing this, the news came that Congressman Douglas Bosco has proposed that oil drilling be allowed in the Arctic National Wildlife Refuge in exchange for the promise of no drilling on our Northern California Coast. This proposal is unacceptable and cannot be put over. The rebuffed oil companies will simply come back to attempt their assaults on our coast.This is why there must be complete protection for the Cordell Bank.

Time is of the essence here and we urge speedy designation of the Cordell Bank National Marine Sanctuary, with Boundary Alternative 1, containing absolute prohibition against offshore drilling.

Please send us the Final EIS and the Management Plan, when issued.

Thank you,
Roscoe A. Poland
Roscoe A. Poland, Director

cc: Senator Alan Cranston
Senator Pete Wilson
Congresswoman Barbara Boxer
Congresswoman Nancy Pelosi
Congressman Jim Bates
Congressman Douglas Bosco
Honorable C. William Verity, Jr.
Mr. Edward Wilczynski

As we save the natural world, we also save ourselves.

1. See Generic Response A.

2. See Generic Response B.

Expedition Leader:
ROBERT W. SCHMIEDER, Ph.D.

Advisory Committee:
DUSTIN D. CHIVERS, Calif. Acad. Sciences
DANIEL W. GOTSHALL, Calif. Dept. Fish & Game
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CORDELL EXPLORER

Financial Support:
NATIONAL GEOGRAPHIC SOCIETY
CONSERVATION AND RESEARCH FOUNDATION
EXPLORERS CLUB
NATIONAL OCEANIC AND ATMOSPHERIC ADMIN.
SAN FRANCISCO FOUNDATION

CORDELL BANK EXPEDITIONS

4295 WALNUT BLVD., WALNUT CREEK CA 94596 TEL: (415) 422-2821, 934-3735

24 Sept. 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Maanagement Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N. W.
Washington, D. C. 20235

Dear Ms. Allin:

I appreciate this opportunity to provide comments on the Draft Environmental Impact Statement, Management Plan, and Designation Document for the proposed Cordell Bank National Marine Sanctuary.

Cordell Bank Expeditions is a non-profit research association dedicated to exploring and describing Cordell Bank in support of its protection through designation as a national marine sanctuary. This project began in 1977, and has involved the efforts of more than a hundred divers, surface observers, marine biologists and geologists, and a variety of funding agencies, including NOAA. As indicated in the draft documents, this organization provided the primary source material which formed the basis for this nomination. It is with great pleasure that we see the progress toward designation, and it is with the background of ten years of studying Cordell Bank, in the water, in the laboratory, and in the library, that I respectfully offer these comments.

Ahead of my comments I would like to compliment the work of NOAA, and particularly the efforts of Mr. Bill Windom in preparing the draft EIS, draft management plan, and draft designation document. In general, the documents capture the central reason why Cordell Bank is special, namely that due to the overlap of several favorable oceanic and topographic conditions, an exceptionally productive biological community thrives on the Bank and in the surrounding waters. The proposal generally identifies the geographical region with the dense benthic community, and describes the large populations of fish, birds, and marine mammals supported by the Bank. It generally provides for managing the sanctuary and generating public information and research programs.

Less clear is whether this plan satisfies the imperative set forth in the authority to establish marine sanctuaries, Title III of the Marine Protection, Research, and Sanctuaries Act, as amended, 16 U.S.C. 1431 et. seq.:

> "...to designate sanctuaries to promote comprehensive management of their conservation, recreational, ecological, historical, research, educational, or esthetic values,"

and whether it satisfies the goal enunciated on page 10 of the draft documents:

> "...the highest priority for management is to protect the marine environment and resources of the Cordell Bank National Marine Sanctuary (CBNMS)."

I fear that the draft documents do not provide for comprehensive management of the CBNMS, and as a consequence do not provide much protection for its resources. The comments that follow are meant to stimulate revision of the documents to provide for comprehensive management that will provide protection for the Bank and its biological community.

The most significant potential threats are (1) fishing; (2) hydrocarbon activities; (3) removing or damaging resources.

(1) **FISHING**

The fishing industry is generally well-regulated, and there are many well-motivated fishermen concerned with the long-term stability of the stocks. However, there are many records of abuse of fishing grounds, presumably by persons other than those just mentioned. This is relevant to Cordell Bank because we have received many reports of significantly increased fishing pressure on the Bank over the past two years. Such reports are supported by our own field observations in 1986 of significant reductions in the numbers of rockfish, observed both on the fathometer and by divers. In addition, a 2-year project at the Tiburon Marine Laboratory has documented a recent decline in the number of adult rockfish. Many persons have said to me, "...at this rate, there won't be any fish there in a couple of years..."

Given this background, and the fact that the fish are among the most important resources of the Bank, is it right to specifically exempt the fishing industry from any responsibility within the sanctuary? Would it be acceptable to establish a sanctuary and then stand by and watch as its fish are decimated? I am not

1. See Generic Response I.

suggesting that this will actually occur, or that the large majority of fishermen are not reasonable and responsible. It is, rather, the unusual, unpredictable, the accidental, the unforseen, the exceptional circumstance that can creat a threat, and against which any entity such as a sanctuary should be protected. We should say, "What if ... ," and then have an answer. For instance:

* What if ... someone with high technology equipment (a "super-fish-zapper/zipper") suddenly starts taking the rockfish at Cordell Bank in large numbers, but he searches his catch for the rare Albino Goby that has magical powers and throws 99% of the fish back, of which 95% die?

* What if ... someone deploys thousands of traps to capture juvenile fish (without removing them) because they think that adult fish will be attracted to the area?

* What if ... someone introduces an entirely new fish on Cordell Bank that may alter the existing natural balance?

If these scenarios sound far-fetched, just remember what happened to the Sierra Nevada during the gold rush of 1849, or to the Farallon Islands rookery when entreprenours discovered the birds' eggs. We have just come through a crisis relating to gill-netting, in which large numbers of commercial fishermen were taking rockfish from Cordell Bank (and other places) in numbers that threatened extinction. In the case of gill-netting, it took new legislation (California Senate Bill SB40) to stop it. The point is that it is predictable that unpredictable situations will arise that could threaten the resources; we should have some means for dealing with those unpredicted dangers.

2

There is, in addition, a potential direct conflict between fishing and Article 942.6 of the prohibited activites in the draft designation document, namely:

> "Attempting to damage, or damaging, or attempting to remove, or removing, benthic *organisms* ..."

Are bottom fish "benthic organisms" (yes, I would say)? Furthermore, we have often seen bottom damage from fishing gear when diving on the ridges and pinnacles. Every time a lead sinker hits the bottom, it it very likely to damage something, such as the (federally protected) California hydrocoral. Can you sanction bottom fishing while still prohibiting damage to the bottom?

3

4

Although fishing is regulated by many other agencies, those regulations were not designed specifically for special environments such as Cordell Bank. The draft document, p. 7, indicates as much:

2. NOAA will monitor activities on the Bank that may potentially impact the resources. If the resources are endangered then NOAA has the authority to invoke emergency regulations to prohibit specific activities.

3. Benthic organisms are described as those flora and fauna in permanent physical contact with the ocean bottom. Demersal fish are not included in this category. NOAA does not intend to regulate fishing or accidental taking of benthic organisms during the normal course of fishing operations.

4. See Generic Responses I and D. Also the California hydrocoral Allopora californica is not a federally or state protected resource. However the massive density of the coral on Cordell Bank is most unique and deserves the special attention and protection that will be afforded by designation of the area as a marine Sanctuary.

> "...each of these agencies is concerned only with specific activities, rather than with the Bank environment as a whole. Designation of Cordell Bank as a national marine sanctuary can provide the long-term comprehensive planning amd management needed to protect its habitats and ecosystem."

5

If this is so, why do the documents specifically exclude regulating, or responding to, fishing, at present THE major activity on the Bank? It appears to me that the same authority by which the sanctuary is established not only permits but actually requires some type of protection. It seems to me that the "comprehensive management" clause in Title III and the "highest priority is protection" goal in the draft documents strongly argue for some type of control over abnormal fishing activities at Cordell Bank.

Please note that I am not advocating any restriction, regulation, or infringement on the normal activities. Indeed, it is well-known that a major part of my motivation in seeking to have Cordell Bank protected is to protect the fishing industry, both commercial and recreational. It is not the normal that we need protection from, but the ABNORMAL. This is exactly the same situation as with other activities: it is not the normal activities (it is normal to NOT dump chemicals on the Bank), but the abnormal activities (dumping chemicals is abnormal) that are restricted. I see nothing in the proposed sanctuary documents that can protect the Bank from abnormal fishing activities, and I recommend inclusion of same.

5. See Generic Responses G and I.

(2) **HYDROCARBON ACTIVITIES**

6

My general comments here are similar to the comments on fishing in the sense that the proposed documents do not go far enough toward protecting the resources. In this case, however, it is both the "normal" activities and the "abnormal" events that concern us. By "normal" activities, I mean the projected lease sales for *hydrocarbon exploration and development in the vicinity of* Cordell Bank, especially in the Bodega Basin. By "abnormal," I mean unplanned well venting, vessel accident, and the like.

The proposed designation document is very brief on this subject:

> "Hydrocarbon activities will not be subject to regulation at this time but MAY be regulated in the future IF deemed necessary for resource protection" (emphasis is mine).

Does this mean that such regulation is contained within the management plan (Section III:B.2(c)? If so, the plan seems at odds *with the spirit of sanctuary designation. The only area protected*

6. See Generic Response E.

(with the above MAY,IF barriers) is within the 50-fathom isobath, which contains 18.14/101.10 = 17.96% of the sanctuary area. The plan calls for monitoring hydrocarbon activities within 1 nautical mile of the 50-fathom isobath, but the sanctuary boundary lies 3 nm out; the 2-nm strip surrounding the sanctuary open and unrestricted for hydrocarbon development.

For your reference I enclose a copy of a profile of Cordell Bank, with a sketch of an oil rig on the 50-fathom isobath, just a few hundred yards from some of the shallow ridges. The 50-fathom contour is simply too close to the biologically most productive areas on the Bank to provide insulation.

All of these comments add up to one central idea: the boundary of the sanctuary should be larger, and all hydrocarbon activities, including exploration, test drilling, rigging, piping, transporting, and storing petroleum based or related materials, should be totally banned within the entire sanctuary boundary from the outset.

In this regard, I (and the majority of other persons giving input at the scoping meeting in 1984 and EVERYONE speaking at the recent hearings) prefer Boundary Alternative #1. There are many ways to express this as being the most reasonable boundary for the CBNMS:

* The larger boundary provides insulation from any projected hydrocarbon activities. It is well-documented that the birds and mammals utilize the waters around the Bank as well as on the Bank itself, and that they depend on a large buffer zone to fluorish. On a whale-watching trip a few weeks ago, we found the whales off the northwest edge of the Bank; they were there because of food supply determined by the topography and biology of the Bank, but they weren't "on the Bank."

* One look at the chart of the Gulf of the Farallons National Marine Sanctuary is enough to convince a reasonable person that the Cordell Bank area should have been included within that sanctuary, and this includes the waters around the Bank.

7

* The proposed Boundary Alternative #2 would be a legal and management nightmare. By defining a cusp between two sanctuaries, enforcement of sanctuary regulations becomes an exercise in navigational and cartographic virtuosity. Imagine the legalities of determining liability if an infraction took place near the common boundary of the two sanctuaries, where the width of the "non-sanctuary" region is comparable to the length of a large vessel!

* Proposed Boundary Alternative #2 would also foster contempt for the sanctuary. I discussed this with fishermen in Bodega Bay. Their response was "if you can't tell whether you're inside or outside it, why worry about it?" Not every vessel is equipped with satellite navigation. The sanctuary boundary should be simple.

7. See Generic Response A.

* The Bodega Canyon, lying to the north and east of Cordell Bank, is a valuable part of the environment, especially for fishing. Boundary Alternative #1 would include the canyon, whereas the other Alternatives would not.

The draft plan (p. 73) indicates that Cordell Bank is currently excluded from the OCS leasing program, within the 50-fathom contour, and further,

> "if Cordell Bank is subsequently included in the OCS leasing program sanctuary regulations establishing a 'no-activity' zone within the fifty-fathom contour will be CONSIDERED" (emphasis mine).

But establishment of the regulations, according to Article 6 of the draft designation document, requires the full legislative procedure, and would therefore present a substantial barrier to actually occuring. In addition, deferral of implementation of regulations until such time as there is a direct threat violates the spirit and motivation of establishing such regulations. Laws of all kinds, including regulations, are established AHEAD OF TIME OF NEED, so that they may be constructed with as little bias and with as much deliberation as possible. Why wait to protect the Bank against a hydrocarbon threat until the threat is manifest? Expressed differently, why prohibit activities such as removing benthic organisms now, while not prohibiting hydrocarbon activities until it is "necessary for resource protection" (documents, p. 102)? If it is your intention to protect the resources at Cordell Bank from hydrocarbon development in the future, why not simply write this provision in the above statement at the beginning:

8

> "... a 'no-activity' zone ... will be considered TO BE ESTABLISHED."

Or better still, why not simply prohibit all hydrocarbon activities within the sanctuary, from the outset:

> "942.6 Prohibited Activities
> (1) Depositing or discharging materials or substances
> (2) Removing or damaging resources
> (3) Hydrocarbon activities."

Absent this, the imperative to protect the resources appears intentionally frustrated.

9

Regarding emergencies, what is to be done about a disaster like the wreck of the Puerto Rican? What happens when the 120 days are up, but oil is still leaking from a hull? Is this the beginning of

8. The purpose of the Sanctuary is to provide comprehensive management of a special marine area with coordination of existing management authorities and the proposal of only those regulations necessary to fill the gaps in the existing regulatory framework.

9. The T/V Puerto Rican oil spill was a violation of the no discharge prohibition in effect in the Point Reyes-Farallon Islands National Marine Sanctuary. With regards to emergency regulations, NOAA can regulate activities immediately when it is determined to be essential to prevent immediate, serious and irreversible damage to the ecosystem of an area. Harmful activities can be regulated on an emergency basis for up to 120 days, during which permanent regulations may be proposed.

a protracted period to effect an ammendment, or can another 120-period be initiated (which would call the whole idea of a fixed time period into question)?

Another feature that is missing from the proposed regulations is the ability to control hydrocarbon development outside the sanctuary boundary that damages resources inside the boundary. It is true that the proposed regulation 15 CFR Part 942.6 (a)(1)(B) prohibits:

> "...depositing or discharging, from any location beyond the boundary of the Sanctuary, materials or substances of any kind which may reasonably be expected to enter the Sanctuary and injure Sanctury resources."

10

But this will not stop damage from hydrocarbon activities, since arguments could be brought that establishment of a sanctuary boundary carries the implication that the boundary provides sufficient buffer. But this is manifestly not true, since the complex currents can be expected to distribute materials in unpredictable ways. I think the sanctuary should have built into it a requirement that any potential hydrocarbon activity in a broad area be required to demonstrate that it will not injure resources within the sanctuary.

Provision is made to respond to emergencies, but this is limited to "an interim period not to exceed 120 days." Article 4, Section 3 of the draft designation document indicates that it is only possible to provide protection against chronic, or planned, developments outside the sanctuary that damage resources within the sanctuary by going through the same process originally used to set up the sanctuary, and that this must be proposed within a 120-day period, presumably to be acted upon later. Since the present documents took 6 years to produce, and since chronic or planned development would not normally be considered an emergency anyway and would therefore not fall under the emergency regulations, there appears to be no way to prevent damage from hydrocarbon activities outside the sanctuary.

11

I feel very strongly that the situation vis-a-vis hydrocarbon activities in the area around the proposed CBNMS violates the spirit of the national marine sanctuary program and the letter of the Sanctuaries Act. The twin concepts of "comprehensive planning and management" and "protection," so often emphasized in these documents, appears to be simply ignored in this case. It is clear that establishment of the sanctuary DEMANDS protection from ANY threat, and this includes hydrocarbon activities. I strongly urge that the documents provide for this protection.

12

10. See Generic Responses B and E.

11. See Responses at 9 and 10, above.

12. See Generic Response B.

(3) **REMOVING OR DAMAGING RESOURCES**

The draft regulations (p. 107) prohibit:

> "Attempting to damage or damaging, or attempting to remove or removing, benthic organisms on the ridges and peaks of Cordell Bank."

I believe that this should be strengthened in three respects:

13

* **ANCHORING.** Anchoring creats terrible damage, especially to the California hydrocoral (which is a key species at Cordell Bank). This damage is documented in the observations and photographs made by divers during our expeditions. Anchoring creats a large ring of destruction due to dragging of the chain. I recommend that the regulations be written to specifically exclude anchoring on rocky points, except in emergencies or by permit, leaving anchoring in sediment (which is abundant) unrestricted. Generally the sediment is at 30 fathoms and deeper.

Better would be a provision that any activity that could involve mechanical contact with the bottom be subject to regulation and/or permit approval.

14

* **CULTURAL RESOURCES.** Resources include not only benthic organisms, but also cultural resources such as artifacts, rocks, and sediment. For instance, the anchor lost by Edward Cordell when he discovered the Bank in 1869 is a valuable historical artifact, but would be vulnerable to salvage under the proposed regulations. The regulation should protect these additional resources from removal and damage.

15

* **DEEPER WATERS.** The deeper parts of the Bank, including sediment deposits, also contain significant resources, including biota. For instance, some of the sediment deposits constitute a chemical supply that could be mined commercially. The regulation should protect all resources within the boundary of the sanctuary, whether they are on a ridge, peak, or on a canyon, basin, or anywhere else.

I would favor a broader phrasing of the resources protection, such as:

> "...Attempting to damage or damaging, or attempting to remove or removing, or attempting to frighten or frightening any material resource, living or nonliving, other than allowed fishing activities or as provided by permit, anywhere within the sanctuary boundary."

13. See Generic Responses D and E.

14. See Generic Response J.

15. See Generic Response E.

These remarks constitute my main comments. I can offer several others on miscellaneous matters:

* **EXPLOSIVES AND RELATED ACTIVITIES.** Explosives and similar processes are used for seismic sounding, testing, military practice, and other purposes. Such activities creat violent noise in the environment that kills, damages, or frightens organisms. For instance, hydrocarbon survey ships, called "boom-boom boats" by the local residents in Bodega Bay, apparently significantly reduce the catch of rockfish. The same complaint has been voiced in the Gulf of Mexico. I would favor inclusion of a "no-harrassment" provision in the list of prohibited activities, applying to any living organism, not just birds or mammals. 16

* **INTERFERING WITH RESEARCH.** Since research is an avowed goal of management of the CBNMS, interference, such as moving, altering, or destroying markers, buoys, or instruments, and similar means for concerted study, should be prohibited. 17

* **BODEGA BAY.** Since Bodega Bay is the closest port, and from which most boat travel to Cordell Bank take place, I recommend that the sanctuary provide for a branch manager, office, and display in Bodega Bay. A full-time staff person in Bodega Bay may not be necessary, but it certainly seems necessary to have a representative of the sanctuary on location at least part-time, and to provide visitors and residents with an interpretative display of the sanctuary. 18

* **ENFORCEMENT.** The draft documents do not clearly provide for any regular on-site monitoring and enforcement of the regulations. I would strongly recommend that an officer be provided, in the same way that one is provided for the Gulf of the Farallons, and that he make regular rounds of the Bank.

In summary, although I find much laudable in the draft plan, I feel that in its present form it leaves Cordell Bank vulnerable to unpredicted fishing pressure, to planned hydrocarbon development, and to mechanical damage, and I believe that the same Act that authorizes establishment of the sanctuary also requires the completion of its protection from these dangers.

Thank you again for providing the opportunity to submit these comments.

Sincerely,

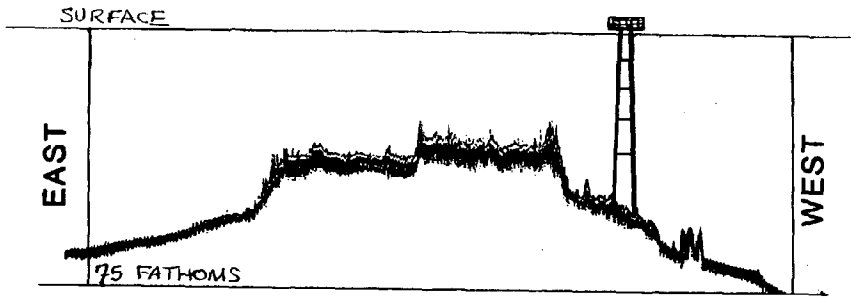
Robert W. Schmieder

Robert W. Schmieder

16. There is no apparent need to propose additional prohibitions that would duplicate current State and Federal statutes protecting marine resources from activities described. Also, see Generic Response B.

17. At present there are no scientific markers and NOAA does not anticipate the placement of buoys and other research markers on or near the bank. If such activities should occur then measures will be enacted, on an ad hoc basis, to protect the research equipment. Thus there is no need to regulate interference with research equipment.

18. See Generic Response G.


SURFACE
EAST
WEST
75 FATHOMS

Defenders
OF WILDLIFE

October 3, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

Defenders of Wildlife submits this letter as our comments and recommendations with respect to the Draft Environmental Impact Statement (DEIS), Draft Management Plan, and proposed rule for the Cordell Bank National Marine Sanctuary. This letter is intended to supplement our verbal testimony submitted at the September 30 public hearing in San Francisco. Please consider our letter and testimony, and include this letter in the appropriate public record. We appreciate this opportunity to provide input.

At the outset, Defenders of Wildlife generally supports and applauds this proposed Cordell Bank National Marine Sanctuary. As you know, Cordell Bank is an undersea "island" of pinnacles and ridges which reach up to within 140 to 115 feet of the ocean surface, located on the edge of the Pacific continental shelf, 20 miles west of Point Reyes. Due to a unique combination of ocean currents, nutrient upwellings, and sunlight penetration, Cordell Bank supports an incredibly diverse and abundant array of marine creatures. Indeed, Cordell Bank and surrounding waters constitute a vigorous ecological community, from small crustaceans and fish up the foodchain to dozens of seabird and marine mammal species (including blue and humpback whales). Unfortunately, Cordell Bank is vulnerable to many possible adverse human activities, such as offshore drilling, tanker spills, and ocean dumping.

In July 1981, NOAA received a recommendation to establish this marine sanctuary. About three years later, NOAA sponsored a public scoping meeting in San Francisco to solicit public comment. We were represented at this meeting, and we recall substantial, if not overwhelming, public support for this sanctuary designation. Since then, it has taken over three additional years for the preparation of the draft documents now available for comment. We are generally disappointed that it has taken NOAA six years to reach this point in the sanctuary designation process. Given a number of oil spills off the California coast in recent years, along with proposals for offshore drilling and ocean dumping, Cordell Bank could have been

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Defenders OF WILDLIFE

harmed during these intervening years. We request expeditious completion of the Cordell Bank National Marine Sanctuary designation.

While we support the Preferred Alternative as far as it goes, we recommend two reasonable and necessary strengthening improvements.

First, we recommend Boundary Alternative #1. This would establish a sanctuary area of 397.05 square nautical miles. As indicated on DEIS page 65, this boundary would include all waters within a line extending southwest from Bodega Head to the 1,000 fathom depth contour west of Cordell Bank, then around the Bank to the southwest until it joins the boundary of the Point Reyes-Farallon Islands National Marine Sanctuary. As stated on page 65, "This alternative, or a variation of it, was the most frequently suggested in comments solicited by NOAA at the scoping meeting in April 1984."

We disagree with the reasons described for rejecting this boundary. For example, much of Cordell Bank's abundant and diverse marine life depends upon the unique contribution of ocean currents and nutrient upwellings. On DEIS pages 18 and 19, the seasonal differences between the California and Davidson currents are described. It is clear that there is a complex mosaic of physical forces at work in maintaining the biological richness of Cordell Bank. We believe that it is arbitrary and capricious to assume that merely extending the sanctuary boundary three nautical miles beyond the 50 fathom depth contour surrounding the Bank will provide sufficient protection. Adverse human activities at three nautical miles could quickly and profoundly affect marine resources on the Bank.

In contrast, Boundary Alternative #1 provides a more logical, manageable, and enforceable boundary. It is consistent with most of the public input received by NOAA. In addition, the DEIS indicates on page 65 that there is "...no need to protect all of these waters as a habitat upon which marine mammals depend," given provisions of the Marine Mammal Protection Act (MMPA). While the MMPA generally protects marine mammals against physical takings, we are not aware of any MMPA provision protecting "critical habitat" per se. In other words, the MMPA may not necessarily preclude harmful human activities in areas of historic marine mammal importance or concentrations. Thus, marine sanctuary designation can provide marine habitat protection not afforded by the MMPA.

We also wish to clarify any confusion with respect to our endorsement of Boundary Alternative #1. When we first received the draft documents, we erroneously believed that the Interior Department proposals for offshore leasing would not affect the waters proximate to Cordell Bank. We were also under the false impression that the Preferred Boundary Alternative #2 may have reflected a compromise reached in consultation with the Interior Department. This led us to initially

1. See Generic Response A.

Defenders OF WILDLIFE

recommend acceptance of Preferred Boundary Alternative #1 to some of our colleagues and wildlife activists. Upon further study, however, we learned that the Interior Department's offshore leasing plans include the proximity of Cordell Bank; indeed, they "surround" the Bank and go to the northern boundary of the existing Point Reyes-Farallon Islands National Marine Sanctuary (please see attached map entitled "Oil Drilling Proposals for the Cordell Bank Marine Sanctuary"). We further learned that there is no compromise or understanding per se with the Interior Department or others with respect to the Preferred Boundary Alternative #2. In light of these clarifications, we have decided to strongly support and recommend Boundary Alternative #1 for the reasons expressed above. We apologize for any confusion or misunderstanding.

The second strengthening improvement we recommend is an outright and full prohibition on any offshore oil and gas exploration or development within the whole sanctuary boundary. Given the Interior Department's leasing proposals which "surround" the Bank, offshore exploration and development may pose the most serious threats to the Bank's natural integrity. We are not reassured that Interior Secretary Hodel's 5-year offshore leasing plan has removed Cordell Bank's 50 fathom contour from leasing activities. Offshore leasing and development could still occur around and near Cordell Bank, and the changing currents in this area could quickly carry drilling muds, toxic substances, and oil into the Bank. It is equally distressing that the preferred alternative would simply retain the option of considering offshore drilling restrictions in the future. We believe this is a backward and anemic approach. In a terrestrial context, this approach would be analagous to recommending creation of a national park or wilderness area without any restrictions on oil drilling or mining, but merely retaining the possibility of restricting these activities in the future. Cordell Bank needs and deserves realistic protection.

2

As you know, California's two existing sanctuaries at the Channel Islands and Point Reyes-Farallon Islands both include regulations prohibiting offshore drilling. These regulations represent a hard-fought victory over objections from the Interior Department and oil companies. After the promulgation of these regulations, oil companies sued in an attempt to invalidate them. Fortunately, these regulations were upheld during this legal challenge. Sadly, the preferred alternative in this DEIS is so weak with respect to offshore drilling, that it is analagous to a boxer "throwing in the towel" after defeating a challenger. In other words, Cordell Bank appears equally qualified to receive an offshore drilling prohibition comparable to the regulations now in effect for California's other two sanctuaries.

In conclusion, please work for the expeditious designation of the Cordell Bank National Marine Sanctuary, with regulations strengthened

2. See Generic Response B.

Defenders
OF WILDLIFE

to reflect Boundary Alternative #1 and prohibiting any offshore oil and gas activities.

We would also appreciate a copy of the Final EIS and Management Plan when they become available.

Thank you very much for your assistance, and for considering our views.

Sincerely,

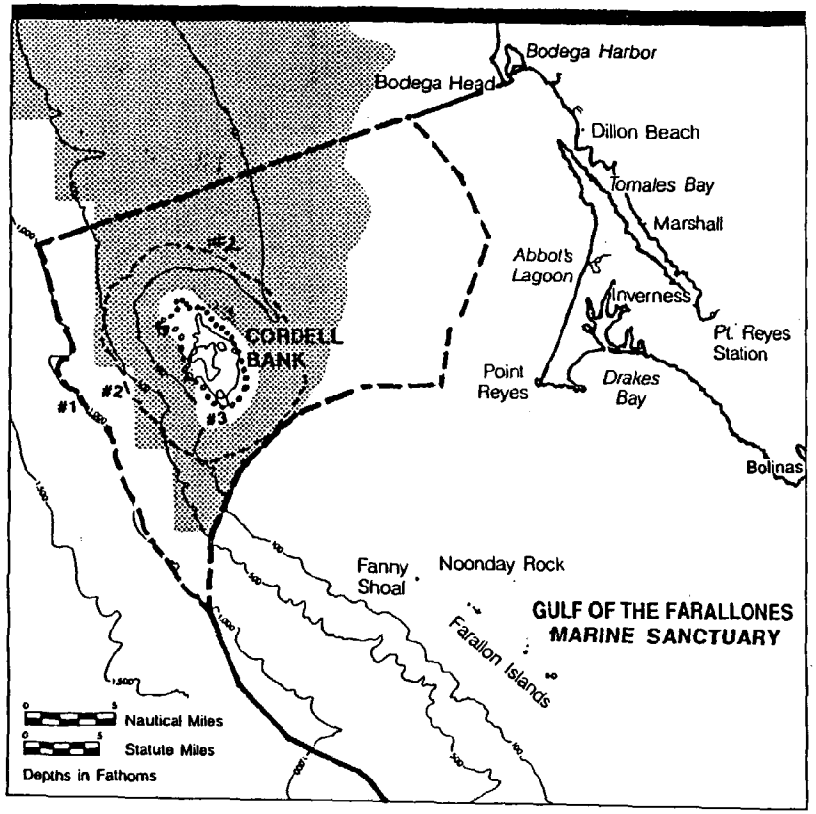
Richard Spotts
RS

Richard Spotts
California Representative
Defenders of Wildlife

RS/js
Encl. 1

cc: Senator Alan Cranston
Senator Pete Wilson
Congresswoman Barbara Boxer
Congresswoman Nancy Pelosi
Congressman Douglas Bosco
The Honorable C. William Verity, Jr.
Mr. Edward Wilczynski
Jananne Sharpless
Interested parties

OIL DRILLING PROPOSALS FOR THE CORDELL BANK MARINE SANCTUARY



Proposed Cordell Bank National Marine Sanctuary

- Proposed Boundary #1
- Proposed Boundary #2
- Proposed Boundary #3

Interior Department Proposals for Offshore Oil Leasing Areas

The Environmental Forum of Marin

THE ENVIRONMENTAL FORUM OF MARIN
P.O. BOX 74
LARKSPUR, CA 94939

A NON-PROFIT CITIZEN GROUP DEVOTED TO EDUCATION IN MARIN COUNTY ON ENVIRONMENTAL MATTERS.

October 10, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuaries Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Re: Cordell Bank Marine Sanctuary

Dear Ms. Allin,

The Environmental Forum of Marin would like to go on record as supporting the creation of the proposed Cordell Bank National Marine Sanctuary. In reviewing the proposed alternative boundaries, we can support only the Alternative # 1. In order to protect the delicate food chain activities on the bank the widest possible area needs to be included within the sanctuary boundaries. This also goes for the overlapping proposal for offshore oil leasing. These are incompatible designations and any activity related to exploration, drilling or mining must be restricted in the sanctuary.

1

2

We are excited to find an offshore proposal we can fully support. The future of our offshore marine life may well rest on how quickly these delicate ecosystems receive complete sanctuary status.

We do find the extremely short time for public comment rather disturbing and hope a more expeditious system of notice can be developed in the future.

Most Sincerely,

Virginia Souders-Mason

Virginia Souders-Mason
President

OCT 1987
VED

1. See Generic Response A.

2. See Generic Response B.

THE FUND FOR ANIMALS INC.

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(415) 474-4020

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Legal Counsel

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September 25, 1987

Ms. Vicki Allin, Acting Chief
Marine & Estuarine Management
Division
Office of Ocean & Coastal Resource
Management
National Ocean Survice/NOAA
Washington, D.C. 20235

Dear Ms. Allin,

1 We urge you to support the sanctuary status for the Cordell Bank National Marine Sanctuary (alternative #2; Boundary alternative #2)

2 Also, we urge the ban on offshore oil and gas exploration nd development, be extended to the whole boundary of the sanctuary.

It is so important to keep the possibility of an oil leak completely away from the sanctuaries marine life -- one mistake could destroy the sanctuary for years.

Thank you for your consideration.

Sincerely,

Virginia Handley

1. See Generic Response A.

2. See Generic Response B.

200 WEST 57th STREET • NEW YORK, N.Y. 10019
Telephone: (212) 246-2096 / (212) 246-2632

Golden Gate Audubon Society

A Chapter of the National Audubon Society
Serving San Francisco and Parts of Alameda and Contra Costa Counties

709294

October 2, 1987

Mr. C. William Verity, Jr., Secretary of Commerce
Department of Commerce
Washington, D.C. 20230

1987 OCT -6 A 8:51

Dear Mr. VERITY:

1 The Golden Gate Audubon Society urges you to create a Cordell Banks National Marine Sanctuary. We, therefore, urge you to adopt the preferred alternative (Alternative #2, Boundary Alternative #2) in the DEIS now being evaluated.

We in the Golden Gate Chapter, National Audubon's second largest chapter with over 6,000 members, are well acquainted with the "Banks". Our members are constantly visiting it, by boat, of course, because of its incredibly rich birdlife. We know it to be one of the important natural resources off the West Coast. Please

2 give it the protection it deserves by making it a National Marine Sanctuary and by banning offshore gas and oil exploration and development over its entire boundary. Thank you for your consideration.

Sincerely yours,

Arthur Feinstein, President

1. See Generic Response A.

2. See Generic Response B.

GREENPEACE
PACIFIC SOUTHWEST OFFICE
FORT MASON • BLDG. E • SAN FRANCISCO • CALIF • 94123
(415) 474-6767 • TELEX 340 275

October 7,

Ms. Vickie Allin
Marine Estuaries Management
Division
Office of Ocean and Coastal Resource
Management
National Ocean Service/NOAA
Washington D.C. 20230

Dear Ms. Allin:

1 I am writing this letter support of the designation of Cordell Bank as a National Marine Sanctuary. There is simply nothing quite like this rich marine environment anywhere, it is irreplaceable. Greenpeace supports boundary alternative #1 because Cordell Bank contains a much needed buffer zone. Oilspills and drilling muds from OCS operations are both capable of traveling great distances and a buffer zone would ensure the bank's safety. Drilling muds contains toxins such as heavy metals. Californians are well aware of the problems associated with oil spills through the Puerto Rican oil spill of 1984, and the recent sinking of the Pac Barones.

2 We are deeply concerned that there are no provisions in the present sanctuary proposal to ban oil and gas leasing within the sanctuary boundaries. It is frustrating to us that the sanctuary program has not been given the same protections guaranteed to our national parks and wilderness areas. Although Cordell Bank is not included in the present five year plan, there was interest by the oil industry in the bank in 1978 and there is no reason to assume that it wouldn't be proposed for the next five year plan. Greenpeace believes that a ban on oil and gas leasing should be the cornerstone of any sanctuary proposal.

We at Greenpeace are very enthusiastic of the Marine Sanctuary Program and hope that our suggestions are taken into consideration the decision making process. Thank you.

Sincerely,
Erik Johnson

Erik Johnson
Greenpeace
Fort Mason Blg. E
San Francisco, CA
94123

1. See Generic Response A.

2. See Generic Response B.

GREENPEACE
PACIFIC SOUTHWEST OFFICE
FORT MASON • BLDG. E • SAN FRANCISCO • CALIF • 94123
(415) 474-6767 • TELEX 340 275

My name is Erik Johnson and I'm here tonight representing Greenpeace. Greenpeace is an international organization with officesin 17 different countries and a membership of 200,000 in California alone.

I have a brief statement prepared tonight regarding the proposal to create the Cordell Bank National Marine Sanctuary.

We feel very strongly that NOAA adopt boundary alternative #1 which would provide the broadest area of protection. We feel that itis absolutely necessary to include a ban on OCS oil and gas leasing as part of the regulatory framework for the entire National Marine Sanctuary from the beginning.

There are several reasons why both of these provisions are necessary.

First there is simply nothing quite like Cordell Bank on the entire coastline. It is a thriving marine environment. Shallow waters allow a high degree of light penetration for photosynthesis in algae and plants. In addition there is a high nutrient concentration because of surface currents and upwelling. This ecosystem supports an incredible diversity of marine life including a number of endangered species. Humpbacked whales have been feeding on krill there all summer long. Gray whales, blue whales, finback whales, the brown pelican, and the short tailed albatross also have been observed on Cordell Bank.

Boundary alternatives #2 and #3 are completely inadequate to protect such an important resource. The larger of the two, boundary alternative #2, contains no buffer zone that would protect the bank from drilling muds and oilspills. Plumes of toxic drilling muds are capable of traveling miles from their sources. Drilling muds contain heavy metals such as barite, zinc, chronium, and in some cases mercury. Oilspills can also travel great distances. Oil from the Puerto Rican tanker spill stretched for 140 miles. The fuel oil from recent sinking of the Pac Barones stretched for twenty miles at one point.

We insist that there be a ban on oil and gas leasing on Cordell Bank because although there are no provisions for leasing there in the present five year plan that is no guarantee that it will not be included in the next round. A number of nominations were received by the oil industry in 1978. A full ban on all OCS oil and gas drilling should be the cornerstone of any marine sanctuary proposal.

3 Finally, we believe that the $50,000 maximum penalty for any violations of the Sanctuary regulations is completely inadequate. If one could put monetary value on the loss that would occur if a major spill occurred on Cordell Bank, we feel it would be a great deal higher and urge that the penalties be raised significantly.
4 We also urge that the budget for managing the sanctuary be raised

3. The $50,000 maximum penalty is per day. Therefore an offence that occurs within the Sanctuary is liable for compensation at the established penalty until the offence is mitigated or no longer poses a threat to the Sanctuary.

4. See Generic Response D.

significantly and that an oil spill recovery team be stationed in Bodega Bay rather than San Francisco.

GREENPEACE

LEAGUE OF WOMEN VOTERS OF MARIN COUNTY • 412 D Street • San Rafael, California 94901 • (415) 459-0292

October 10, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuaries Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Re: Cordell Bank National Marine Sanctuary.

Dear Ms. Allin,

We are a member of the League of Women Voters Northern California Coalition. A long letter has be sent to you regarding our support of the Cordell Bank Marine Sanctuary by our Chairperson Kathleen Gordon. As an individual League we wanted to stress two points that were discussed at great lengths in the above mentioned letter.

We first want to congratulate NOAA on the designation of Cordell Bank as a National Marine Sanctuary. Such ecologically productive areas for marine life are national treasures that must not be allowed to degrade. That is why we find the overlapping of the proposed boundary #1, which we deem the best alternative, and the proposed offshore oil leasing area to be in conflict. Within the Marine Sanctuary Boundary should be a "No Activity" zone for hydrocarbon exploration and development to protect no only Cordell Bank but also The Gulf of the Farallones Marine Sanctuary.

Our second concern is with the extremely short time between public notice and the close of time for written comment. Natural resource issues are important to the California public and we wish be remain involved in the decision making process. We would appreciate being placed on public notice mailing lists for future information regarding Cordell Bank.

Sincerely,

Roberta Keiler

Roberta Keiler
President

OCT 1987
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1. See Generic Response A.

2. See Generic Response B.

LEAGUE OF WOMEN VOTERS
NORTHERN CALIFORNIA COALITION
P.O. Box 196, The Sea Ranch, CA. 95497

10 October 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Re: Draft Environmental Impact Statement/Management Plan -
Cordell Bank National Marine Sanctuary

The League of Women Voters Northern California Coalition is made up of the Leagues of the Bay Area, Marin County, Sonoma County, Napa County, Ukiah, Mendocino County and Humboldt County. The Coalition was organized to gather information, study and respond to issues related to offshore oil exploration, drilling, production and transportation. We noted in connection with Department of Interior's Proposed 5-Year Outer Continental Shelf (OCS) Oil & Gas Leasing Program for 1987-1991 that the EIS for the Cordell Bank National Marine Sanctuary was in process. It is, therefore gratifying to be able to respond to your Division's proposed DEIS/Management Plan.

The Coalition congratulates NOAA on its proposal to designate the Cordell Bank as a National Marine Sanctuary. We agree with your selection of the Sanctuary designation as the preferred alternative to the Status Quo alternative. We are very supportive, as are state and the national Leagues, of efforts toward the wise use of natural resources and the preservation of the physical, chemical and biological integrity of the ecosystem. We find this especially critical in the case of unique or fragile areas, such as Cordell Bank.

1 We urge the selection of Boundary Alternative No. 1 since it will provide significantly better protection for the immediate fishing grounds and the surrounding area. We believe that the protective measures should be put into effect as soon as possible. In view of the values of the benthic resources of Cordell Bank to scientific research and fisheries, the

2 protective measures should include prohibiting harmful discharges from vessels, prohibiting removal or damage of benthic resources, establishing a "No activity" zone for hydrocarbon exploration and development, and establishing monitoring programs. Our Coalition does not find it prudent to wait, as the "No Immediate Regulation" alternative for Hydrocarbon Development Activities proposes, until after a Lease Program is in place to begin to consider whether limits on oil development operations are or are not appropriate. We would hope to see the "Immediate Regulation" alternative adopted to provide the crucial protection for Cordell Bank and

1. See Generic Response A.

2. See Generic Response B.

the nearby Point Reyes/Farallon Islands National Marine Sanctuary based upon the risks described in the Environmental Consequences of the DEIS.

We appreciate the additional time for written comment, since the public notice in the local areas for hearings was Friday to the following Tuesday, allowing very little time for interested public to secure and review copies of the DEIS. We do urge you to continue to involve the public in the decision making process for important issues such as the protection of the Cordell Bank.

Sincerely,

Kathleen Gordon, Chairperson

cc: Mr. Edward Wilcynski, ActingChief
Ecology and Conservation Division
U.S. Department of Commerce, Room 6814
Washington, D.C. 20230

Mr. C. William Verity, Jr., Secretary Designe
U.S. Department of Commerce
Washington, D.C. 20230

Marin Community College
Kentfield, CA 94904
(415) 457-8811

September 18, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Division Manager
Office of Ocean and Coastal Resource Manager
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

This letter is a highly supportive vote for the Draft Environmental Impact Statement/Management Plan for the Cordell Bank National Marine Sanctuary.

I have spent some 33 years observing the marine ecology of the waters in and around the Cordell Bank and have been an active diver on the Bank itself. My comments below reflect years of expertise in these waters from the Cordell Bank to the Marin - San Francisco Bay Area - involving about 24 publications of the biota of these marine waters.

Statements and Recommendations

1. The value of the CBNMS is that it truly is a unique marine ecosystem and is certainly worthy of Sanctuary status.

2. It is yet unknown how the ecosystem of the Bank affects the entire Gulf of the Farallones - San Francisco Bay Estuary System. The Bank appears to be a biological sentinel on the edge of this important marine water system, and such potential is worthy of sanctuary protection and future research.

3. The hydrocoral, Allopora californica, is a large population, and must be preserved from potential destructive mechanical forces, such as sea anchors and gill net operations. I agree that oil spills of past magnitudes have not posed a threat to this biota, but the future potential from a nearby oil platform spill in the Bodega Basin might be a distance concern. The species is not rare, as stated on page 5. It is endemic to deep-cold waters and the species can be abundantly found from Northern California to the Isla San Martin area of the Baja-Pacific. The massive density of the Allopora on Cordell Bank is most unique and requires protection.

1. Comment accepted. Allopora californica is not rare also the California hydrocoral is not a federally or state protected resource. However the massive density of the coral on Cordell Bank is most unique and deserves the special attention and protection that will be afforded by designation of the area as a marine Sanctuary. Also see Generic Responses B and D.

2 4. I favor the Proposed Boundary No. 2 as the most practical and sufficient for protection.

3 5. I also favor Management Alternative No. 2 where CBNMS is fused to PRNMS. Such management should expand the advertisement of the Bank through educational diorama and brochures. Moreover, such historical releases should always mention the work of Dr. Robert W. Schmieder. This DEIS would not be possible without his collective years of data.

4 I recommend an addition to management - to form a Scientific Advisory Committee to assist the actions of the future CBNMS-PRNMS administrators.

Thank you for this reviewer opportunity. Please keep me on your mailing list of events.

Sincerely,

Gordon L. Chan

Gordon L. Chan, Ph.D.
Biology Department

GLC/cfp
cc: Dr. E. Wilczynski
Dr. R. W. Schmieder

2. See Generic Response A.

3. No Response Necessary.

4. NOAA supports this idea and hopes to have the advise of the scientific community incorporated into the management structure of the Sanctuary.

Marin Audubon Society Box 599 Mill Valley, California 94942-0599

October 9, 1987

Vickie Allin, Acting Chief
Marine and Estruaine Management Division
Office of Ocean and Coastal Resro7uce Management
National Ocean Service/NOAA
1825 Connecticut Avenue. N.W.
Washington, D.C. 20235

Dear Ms Allen:

This is to express support establishment of the Cordell Bank National Marine Sanctuary. Cordell Bank is an extremely rich and productive marine ecological community supporting substantial populations of fish, crustaceans, marine mammals and seabirds.

Further, Alternative #1 boundary is the only reasonable and safe baoundary to provide the critical protections needed for this unique habitat. This fragile habitat resouce is vulnerable from numerous human-related activities.

We appreciate your full consideration of our recommendations.

Sincerely,

Barbara Salzman, Chair
Conservation Committee

1. See Generic Response A.

MARIN CONSERVATION LEAGUE

A non-profit corporation founded in 1934

1330 Lincoln Avenue, San Rafael, CA 94901
Office telephone: 456-1912

709145

Address change: 35 Mitchell Boulevard, Suite 11
San Rafael, CA 94903
Office telephone: 472-61[illegible]

September 24, 1987

1987 SEP 28 P 1:30
EXECUTIVE SECRETARIAT
DEPARTMENT OF COMMERCE

Mr. C. William Verity, Jr., Secretary Designe
United States Department of Commerce
Washington, D.C. 20230

Dear Mr. Verity:

The Marin Conservation League urges your support in establishing the Cordell Bank National Marine Sanctuary.

This is a highly productive "island" under the sea, supporting an important fishery, and biologically unique populations of benthic organisms. Because the area is located so close to islands supporting breeding colonies of marine mammals and sea birds and because of the uniqueness of its own flora and fauna; it is a major and significant area to protect.

We have long supported inclusion of the Cordell Bank in the Marine Sanctuary Program. We hope to see it become a reality.

Sincerely,

Roger F. Hooper
President

cc: Defenders of Wildlife
Whale Center

No Response Necessary.

Past and Present

Angel Island
Mt Tamalpais
Samuel Taylor Park
Bolinas Lagoon/Kent Island
Stinson Beach
Drakes Bay Beach
Tomales Bay
Pt. Reyes National Seashore
Richardson Bay Sanctuary
Corte Madera Tidelands
Strawberry Tidelands
Bothin Marsh
Heerdt Marsh
The Northridge
Rancho Olompali
Marin's Agricultural Lands
Marin's Dairy Farms
Coastal Protection
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Natural Resources
Defense Council

90 New Montgomery
San Francisco, CA 94105
415 777-0220

October 9, 1987 VIA FEDERAL EXPRESS

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

RE: Comments on Cordell Bank National Marine Sanctuary -- Draft Environmental Impact Statement/Management Plan

Dear Ms. Allin:

Enclosed are the comments of the Natural Resources Defense Council, Inc., on the draft environmental impact *statement/management plan on the proposed Cordell Bank* National Marine Sanctuary.

Overall, NRDC strongly supports the designation of Cordell Bank as a marine sanctuary. However, as set forth in our comments, we believe the proposal is seriously flawed and fails to provide adequate protection for the sanctuary's outstanding resources. Specifically we have addressed our comments to the areas of boundary size, regulation of hydrocarbon development, and sanctuary management.

We recognize the considerable work your office has done on this project since the sanctuary was proposed in 1981. We commend your efforts and hope that you will seriously consider our comments in the preparation of the final EIS and plan.

Sincerely,

Bruce Goldstein
California Coastal Project

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COMMENTS OF THE

NATURAL RESOURCES DEFENSE COUNCIL

ON THE

DRAFT ENVIRONMENTAL IMPACT STATEMENT/MANAGEMENT PLAN

ON THE

CORDELL BANK NATIONAL MARINE SANCTUARY

October 9, 1987

Prepared by:

Bruce Goldstein
Johanna Wald

California Coastal
Project

The Natural Resources Defense Council, Inc. (NRDC) is a non-profit environmental membership organization with over 65,000 members and offices in San Francisco, New York, and Washington, D.C. NRDC is pleased to submit the following comments on the proposed Cordell Bank National Marine Sanctuary. In them we specifically address the May, 1987 draft environmental impact statement/management plan (DEIS) prepared by the Marine Estuarine Management Division of the National Oceanic and Atmospheric Administration.[1]

I. The Marine Sanctuary Designation

NRDC strongly supports the designation of this uniquely rich area as a marine sanctuary. A rare combination of favorable ocean currents, nutrient upwellings, and sunlight penetration has created an incredibly diverse ecological community. This vigorous community is concentrated on the "undersea island" of Cordell Bank and supports an entire food chain from benthic organisms to large birds, fish and mammals. Life found in the area includes varieties previously unknown in these waters as well as at least four endangered species -- the humpback whale, the blue whale, the Brown pelican, and the short-tailed albatross.

The National Marine Sanctuary designation is needed so that preservation of this special Cordell Bank resource is permanently insured. The proposed sanctuary plan is intended to achieve this

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[1] Unless otherwise indicated, page references are to the DEIS.

goal. The DEIS states that long term protection of these resources is the highest priority of the plan. (pp. xi, 39). Under the proposed sanctuary designation and plan, this protection is to be achieved by prohibiting vessel discharges and removal of benthic organisms (except for research purposes).

While these are important steps, the sanctuary as currently conceived in the "preferred alternative" is inadequate in its scope and defective in its proposed implementation. Without adoption of the changes recommended below, NRDC fears that the goal of resource preservation for Cordell Bank will not be accomplished.

II. Sanctuary Boundaries

NRDC supports the adoption of Boundary Alternative 1 over the preferred alternative (Boundary Alternative 2). Alternative 1 received the most support in feedback previously solicited by NOAA (p.65) and, based on testimony presented at the September California hearings, continues to be the "preferred alternative." Boundary Alternative 1, approximately 300 square nautical miles larger than Alternative 2, would create the type of buffer zone that genuinely protects the ecological community of Cordell Bank.

We disagree that the preferred alternative is "tailored to specific resources" in accordance with the Sanctuary Program goals. (p.65) Ocean currents rich with nutrients extend beyond the immediate Bank area to support fish, seabirds, and mammals. (Testimony of Robert Schmieder, Expedition Leader, Cordell Bank

1. See Generic Response A.

Expeditions, DEIS Hearing, 9/26/87, Fort Mason, California.) These diverse life forms, which sometimes feed and congregate beyond the Boundary 2 area, are an integral part of the Cordell Bank ecosystem and should be afforded maximum protection. Boundary Alternative 1 serves to better protect these citizens of the Bank.

The need for a meaningful buffer zone is especially critical when considered in light of possible hydrocarbon pollution. The Cordell Bank area is of continued interest to the oil industry (See III. Hydrocarbon Regulations). Should oil development take place, sanctuary life will be at great risk. Drilling discharges and mud drifts contain heavy metals and chemicals that are particularly toxic to the benthic biota. (p. 81-82) Drilling pollutant plumes can travel long distances, emphasizing the need for the larger Boundary 1 alternative. The DEIS' conclusory statements that Cordell Bank would be protected from the discharges because of strong currents and a drilling prohibition within the 50 fathom contour (p. 82) are neither supported nor credible.

The need for a larger oil free boundary zone is further supported by the DEIS' finding that, if "oil development were to take place in the area of Cordell Bank, spills from blowouts and platform accidents are likely to occur, although the volume spilled would probably be minor." (p. 85) While we appreciate the optimism that any spill "would probably be minor", the fact is that the most recent oil spill off the California coast was

major and involved the loss of over 56,000 gallons from the Pac Baroness. See Los Angeles Times, September 29, 1987, p. 3.) So too was the 5,000 barrel Puerto Rican spill. Under these circumstances, we think it best not to risk the biological integrity of the sanctuary on such speculation.

As the DEIS points out, oil spills can present a particularly dangerous threat because of the creation of a subsurface plume of oil droplets with high concentrations of alkyl benzene and naphthalene which are acutely toxic to marine organisms. (p. 83) The Interior Department has estimated that offshore containment and cleanup operations average only 5% to 15% recovery of spilled oil. (Department of the Interior, Draft Environmental Impact Statement for Lease Sale 97 at IV-A-15.) The California Coastal Commission has found that practical use of mechanical spill clean-up equipment is limited to 6-foot seas -- a level frequently exceeded in the Cordell Bank area. Both the Pac Baroness and Puerto Rican spills reveal that the oil industry and the federal government lack the ability to respond effectively to oil spills that might occur in this area.

Finally, adoption of Boundary Alternative 1 would create a contiguous border with the Gulf of the Farallones Marine Sanctuary. This would provide management and surveillance benefits consistent with the DEIS' emphasis on coordination with the Farallones Sanctuary administration. It would also help avoid the potential problem of oil development or other uses of

the "gap" for purposes antithetical to that of a marine sanctuary.

III. Hydrocarbon Regulations

2 It is difficult to understand the meaning of a "marine sanctuary" designation without a prohibition on hydrocarbon development. Such a prohibition has been incorporated in the designation of all other sanctuaries in the national program. NRDC strongly supports the imposition of a full ban on oil and gas drilling activities within the entire Cordell Bank Sanctuary area. This ban should be in effect from the first day of official sanctuary status.

The Department's rationale for not including regulations on hydrocarbon development at this time is that Cordell Bank has been excluded from the current Five-Year OCS Oil and Gas Leasing Program. (p.73) This exclusion provides little reassurance that oil development will not eventually take place.

The oil industry urged the Department of the Interior to include tracts within the proposed Cordell Bank Marine Sanctuary in Lease Sale 53 when the tract selection process was conducted in 1978. (p. 33) An agreement to place the entire Bodega Bay Basin (including Cordell Bank) off-limits to offshore drilling until the year 2000 was reneged upon by Interior Secretary Hodel. Instead, what we now have is the deferral of only the central core area of the Bank (within the 50 fathom contour line) only

2. See Generic Response B.

until 1992 when the current Five-Year OCS Leasing Program expires.

There are several serious problems with this approach. Given the policy reversals of the Department of the Interior, and oil industry interest in this region, there is no guarantee that the sanctuary will be secure from oil development in the next Five Year Program. This reinforces the need to promulagate regulations now, before imminent development or political pressure makes permanent protection of the sanctuary more difficult.

If oil and gas development were permitted within the proposed sanctuary in the future, the DEIS only contemplates regulations that would prohibit oil and gas exploration within a 50 fathom "no activity" zone. Development within an area of one nautical mile beyond the "no activity zone" might then be "monitored". The tentative nature of the monitoring is indicated in the DEIS: "If [oil development] does occur NOAA's Marine and Estuarine Management Division will investigate, in coordination with the Department of the Interior, the necessity of instituting a monitoring program." (p.73) (emphasis supplied).

The proposed management plan currently provides no additional staff and budgets only $65,000 per year for sanctuary protection and research. (p. 64) Without a significant commitment of additional resources, monitoring, if it occurs at all, will provide little meaningful protection to sanctuary life.

The fact that the current OCS leasing deferral and the future

contemplated sanctuary regulations only include an oil development ban within the 50 fathom contour line is of acute concern. As explained above (II. Sanctuary Boundary), the environmental impacts of oil drilling extend beyond the immediate drill site. Protection within only the 50 fathom zone threatens the central core of the sanctuary. It allows oil development to practically hug "the island" segment.

The oil industry is not hesitant about drilling near environmentally sensitive areas. The placement of oil platforms at the edge of sanctuary boundaries has already occured at the Channel Islands Marine Sanctuary. It is conceivable that in the course of oil development, platforms would be anchored to Cordell Bank "island" ledges, killing plant and benthic organisms that compete for space in this densly crowded area. Even if this did not occur, drilling within such close range of the sanctuary core would present a clear danger to the ecological balance and health of the Bank.

As stated above, Cordell Bank would be the only marine sanctuary without full protection from hydrocarbon development if the preferred alternative of the DEIS were adopted. NRDC firmly believes that unless a ban on all hydrocarbon activity within the entire boundary zone is included in sanctuary status, the protective intent of the Marine Protection, Research, and Sanctuaries Act will be violated. We strongly urge incorporation of such a ban in the final environmental impact statement and plan.

3

IV. Management Plan - Enforcement and Safety

The management plan puts great emphasis on consolidation and coordination of sanctuary administration with existing agencies. While NRDC supports the general thrust of the plan, we are concerned that a lack of resources and inadequate monitoring and enforcement efforts will severely compromise the protection of the sanctuary area. The plan essentially places all significant responsibility for sanctuary protection from vessel discharges, gill netting, and oil and gas development on the Coast Guard and the California Department of Fish and Game (CDF&G).

Both of these agencies have significant responsibilities beyond guardian of the sanctuary area. CDF&G in particular has struggled with recent budget cutbacks to carry out their extensive statutory responsibilities. The Coast Guard, in addition to its proposed sanctuary duties, is responsible for vessel traffic, boater safety, search and rescue operations, and most recently a focus on illegal drug traffic interdiction.

The DEIS makes no mention of how these agencies will be able to absorb their added sanctuary duties into current workloads. No estimates appear as to how much time either organization will be able to devote to sanctuary surveillance. The DEIS refers to an "emphasis on protection ... rather than enforcement." (p.85) Without specific agency commitments and a detailed framework of how resource protection will actually be implemented, the promise of protection is an empty one.

3. See Generic Response G.

The plan also assumes that the staff functions of the Cordell Bank Sanctuary can simply be absorbed by the current Farallones Sanctuary staff. While consolidation should allow for some staff and administrative savings, it is not clear that the research, interpretation, and protection goals of the Cordell Bank Sanctuary can be fulfilled by existing staff.

NRDC is particularly concerned about peak periods between June and October when visitors to the center and to the Sanctuary are highest. At the very least, additional staff who will focus on the specific needs of Cordell Bank should be added during peak periods.

Finally, with the memory of the Puerto Rican oil spill and more recently the collision of the Pac Baroness off Santa Barbara, it is important to do everything possible to improve ship safety around the sanctuary area. This might take the form of special bouys, communication systems, or redirection of vessel traffic. Adequate prevention actions are particularly important given the painfully obvious limits of existing oil spill clean-up technology. Specific proposals to better safeguard shipping in the area should be included as part of the final environmental impact statement.

4

4. See Generic Response H.

V. Conclusion

NRDC strongly supports the creation of the Cordell Bank National Marine Sanctuary. Cordell Bank is unique in the diversity and density of its marine life and is a rare and

valuable national resource deserving federal protection. However, we are concerned that the "preferred alternatives" proposal severely compromises the biological integrity of the sanctuary.

Specifically, NRDC supports the inclusion of a meaningful buffer zone that serves to protect the delicate "underwater island." The area beyond the "island" also contains marine life that is a vital part of the sanctuary ecology. Protection of this bio-region will be best achieved through adoption of Boundary Alternative 1.

Further, a marine sanctuary plan that does not ban oil and gas exploration and development within the entire sanctuary zone is self-defeating. The inherent risks of such activities are too great. The failure of the proposed plan to genuinely protect the sanctuary zone from hydrocarbon discharges and spills violates the intent of the Marine Research, Protection, and Sanctuaries Act.

NRDC is also concerned that the management plan does not adequately provide for sanctuary monitoring and enforcement activities. It appears that, without detailed operational plans which indicate how other agencies will effectively assume sanctuary responsibilities, more staff and resources are needed. The need for additional staff support is particularly critical during peak periods. Finally, effective measures to prevent shipping and especially tanker accidents in the greater Cordell Bank area must be undertaken now.

The final environmental impact statement should insure that sanctuary designation will preserve the uniqueness of Cordell Bank in perpetuity. Incorpoaration of the recommendations set forth above into the final plan will help acomplish that shared goal.

Mendocino Sea Vegetable Company
Box 372 Navarro, Ca. 95463

Sept 30, 1987

Comments supporting establishing the
CORDELL BANK NATIONAL MARINE SANCTUARY

Copies to

Ms. Vickie Aiken, Acting Chief, Marine + Estuarine Management Division
Mr Edward Wilcynski, Acting Chief, Ecology + Conservation Division
Mr William Verity, Jr. Secretary Designee, U.S. Dept of Commerce.

Dear Gentle People:

On behalf of our Mendocino Sea Vegetable Company and the National Women's Political Caucus of Mendocino County, I wish to express strong support for the establishment of the CORDELL BANK NATIONAL MARINE SANCTUARY with the following necessary basic protection: (1) inclusion of the entire area of "Boundary Alternative #1", and inclusion of a BAN on OCS oil and gas leasing, exploration and development activities as part of the regulatory frame for the entire Cordell Bank National Marine Sanctuary FROM THE OUTSET. This is essential as this area is exempt only for the current 5 year plan.

1. See Generic Response A.

2. See Generic Response B.

We know from completed studies, as well as studies in progress that the first exploratory steps leading up to oil and gas development, namely seismic survey testing is harmful and disruptive to the marine life and the intrusions and degradation from offshore only get worse.

We appreciate this opportunity for comment and look forward to the establishment of the Cordell Bank National Marine Sanctuary. Please keep us informed. Sincerely, Mrs Eleanor Lewallen

SAN FRANCISCO BAY CHAPTER
OCEANIC SOCIETY
BLDG. E, FORT MASON · SAN FRANCISCO, CA 94123 · PHONE (415) 441-5970

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Dear Ms. Allin:

The Oceanic Society, San Francisco Bay Chapter, supports the designation of Cordell Bank as a National Marine Sanctuary. Cordell Bank is an extraordinary, isolated and fragile resource that must be protected. It is distinguished by its unusual combination of subtidal and intertidal species, the presence of organisms found nowhere else at these latitudes or at these depths, its dense populations of rockfish, and by the discovery of a number of previously unknown benthic species (sponges).

1 We support the proposed management regulations restricting vessel discharges and the collection or disturbance of benthic life in sanctuary waters. We are convinced, however, that the preferred Boundary Alternative #2 is too small and we support the designation of Boundary Alternative #1. Further, we believe there should be no oil development operations within this boundary from the outset in order to be consistent with the National Marine Sanctuary program's stated conservation goals.

2 The preferred alternative notes that the Cordell Bank area has been deferred from leasing for the next five-year OCS program, but goes on to state that, if in the future, oil and gas exploration and development is allowed "...within the boundaries of the Sanctuary...a sanctuary regulation may" - or may not - "be promulgated to prohibit such operations within a 'no activity' zone encompassed by the fifty fathom contour around the Bank." The preferred alternative also promises that such activity within a nautical mile of the fifty fathom isobath will be "monitored" by sanctuary staff should it seem to pose a hazard to the ecosystem of the Bank. There is no mention at all of any authority given to sanctuary staff to limit or prohibit drilling if their monitoring convinces them that there is indeed a hazard. This is inadequate protection, particularly if, in the end, a "no activity" zone is not created, and an oil rig is placed directly

1. See Generic Response A.

2. See Generic Response B.

atop the Bank itself, with all the attendant impacts on the life around and below it.

The unusual depth to which this ecosystem extends (some 35 fathoms), the density and variety of its components - algae, sponges, rockfish, seabirds and marine mammals - are all founded on high photosynthetic activity, especially in the algae growing in the dim light of the lower reaches of the Bank. This primary productivity is, in turn, absolutely dependent on the extraordinary clarity of the water column; visibility is normally 65 feet or more, sometimes more than 100 feet. One of the most distinctive features of Cordell Bank is the presence, in abundance, of the rare purple hydrocoral Allopora californica, found only in waters of pristine clarity. It supports an entire community of organisms that depend on it and live nowhere else; the polychaete worm Polydora alloporis and the small barnacle Armatobalanus nefrens, which live completely encased in the hydrocoral's branches, and the pink snail Pedicularia californica that lives among the branches. It also supports many species of algae. Oil drilling activities could adversely affect these hydrocorals and their associated organisms if a platform were located even several miles away, discharging many thousands of tons of drilling muds and cuttings into the water.

Over a production platform's many years of operation, increased turbidity alone would be a serious threat to life on the Bank. Photosynthesis would be impaired, particularly at lower depths; filter-feeding organisms would be hampered by the water's increased particulate load, and the consequences could spread upward through the food chain. Likewise, even if there were no major oil spill, the many small scale leaks of waste and hydrocarbon spillage which are inevitable (even according to the draft EIS) in an operation as complex as an oil platform, could easily cause toxic effects; for adult planktonic animals, lethal doses of soluble aromatics can be as low as .1 parts per million, and larval stages are usually 10 to 100 times more sensitive. As the Draft EIS itself states: "Chronic small spills may pose a greater hazard than isolated large spills".

The proposed possible restriction of oil and gas activity to the area outside the fifty fathom line would be of limited significance, as the effects of toxic and particulate pollution dispersing from nearby platforms would be cumulative over years. Moreover, it must be noted that the fifty fathom line is usually less than a mile distant from the shallower areas supporting high concentrations of benthic life (especially on the steep western slope that drops to the abyssal plain). Of course, a major spill would be a disaster if it crossed the Bank; the feathers of seabirds and the fur of seals and sea lions that feed there would be fouled, and the ingested toxins would be particularly harmful.

Clearly, allowing oil and gas exploration and development within Cordell Bank National Marine Sanctuary would not be

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consistent with conserving the resource.

Just as clearly, Boundary #2 proposed in the preferred alternative, 3 miles out from the fifty fathom isobath, would be inadequate protection for Cordell Bank's water purity even if there were a ban on oil and gas activity within the borders. Increased particulate load and toxic hydrocarbons could still cross the Bank, particularly if their source were located upcurrent of either of the two major seasonal currents. In the event of a major oil spill or blowout from a well just beyond the boundary there would be only a few miles for the slick to break up, if wind and current sent it across the Bank. Given the practical limits of known spill control and cleanup methods, all the "co-ordination between government agencies" promised in the management plan would of little help at that point. The oil slick resulting from the breakup of the tanker Puerto Rican in the Gulf of the Farallones in 1984 is a case in point. Shifting winds and currents caught planners by surprise; the oil defied the containment booms and clogged the skimmers. In the end only 1,460 barrels of 48,000 were cleaned up.

We strongly urge the adoption of Boundary Alternative #1, running southwest from Bodega Head to the 1,000 fathom line, then south to the Point Reyes/Farallones Islands Sanctuary border, as a sufficient safeguard for the Cordell Bank ecosystem. In addition to the reasons given above, we believe that this boundary would protect the area between Point Reyes and Cordell Bank. This is a vital area of transit, since, to quote the DEIS, "...many of the marine mammals and seabirds that visit Cordell Bank to feed in its waters are also dependent on habitats in the Point Reyes National Marine Sanctuary".

Boundary Alternative #1 is needed to protect the continuous corridor from Bodega Bay to the Farallones used by the large whales. In the summer, in particular, there is frequent migration of whales between Cordell Bank and the Farallones for feeding purposes. During periods of migration, the large whales migrate in depths of 100 to 1000 fathoms. The gray whales use a corridor closer to shore. Failure to include these waters in the boundary designation would leave an unprotected gap.

The entire region - the coast and islands already included in a sanctuary, and the underwater bank now being considered for protection - must be studied, and protected, as a whole. Boundary #1 would rationalize management by creating a single, unbroken unit out of the two adjoining sanctuaries, eliminating the intruding arm of unprotected, unregulated sea - which is largely included in the area of the proposed OCS Lease Sale #91 - from which any pollution or disruption of sensitive wildlife by unrestricted activity could impact the protected waters that surround it on three sides.

Thank you for considering our concerns. We hope that if and

when the proposed sanctuary comes into being, the mechanisms for resource protection and the program of management strategies will be consistent with the sanctuary's stated goals.

Yours sincerely,

Joan Patton

Joan Patton
Conservation Director

PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS, INCORPORATED

Reply to:
☒ P.O. Box 1626
Sausalito, CA 94966
(415) 332-5080

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9 October 1987

Ms. Vickie Allin, Acting Chief
Marine & Estuarine Management Division
Office of Ocean & Coastal Resource Management
NATIONAL OCEAN SERVICE/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

RE: Draft Environmental Impact Statement/Management Plan
CORDELL BANK NATIONAL MARINE SANCTUARY

Dear Ms. Allin:

The Pacific Coast Federation of Fishermen's Associations represents 24 commercial fishermen's organizations along the U.S. west coast. Many of the fishermen belonging to PCFFA member organiztions will conduct fishing operations within the course of a fishing season(s). PCFFA has reviewed the above entitled document and has the following comments/ recommendations:

1

1. The Cordell Bank supports a rich and vital commercial and recreational fishing industry. This fishery has and is managed by a combination of state (i.e., California Department of Fish & Game) and federal (i.e., Pacific Fishery Management Council, National Marine Fisheries Service) authorities. These agencies have expertise in fisheries management and, it is our recommendation in the event of the establishment of a federal marine sanctuary for the Cordell Bank, should retain management and regulatory control over the commercial and recreational fisheries for this area (as is recommended in the DEIS).

1. Comment Accepted. See Generic Response I.

2

2. Due to the uniqueness of the Cordell Bank and its rich biological productivity, adequate boundaries must be established to provide it the maiximum protection possible. We recommend therefore that Proposed Boundary #1 be established.

2. See Generic Response A.

3

3. Again, because of the uniqueness of this area and its rich biological productivity, it must be provided the maximum protection possible from new activities within that area that would impact on the benefical uses of the area for commercial and recreational activities and scientific research. Therefore, it is our recommendation that all offshore oil and gas development be banned within the boundaries of the sanctuary, should it be created, and all dumping of wastes (e.g., radioactive,

3. See Generic Response B.

toxic, dredge spoils) be prohibited.

Thank you for this opportunity to comment and provide recommendations. If you or your staff have any questions, please do not hesitate to call.

Sincerely,

W.F. "Zeke" Grader, Jr.
Executive Director

WFG:lrb

cc: Honorable Douglas H. Bosco
Honorable Barry Keene, Chairman, Joint Committee on Fisheries & Aquaculture
Honorable Dan Hauser, Vice-Chairman, Pacific Fisheries Legislative Task Force
Mr. Edward Wilczynski, Department of Commerce
Pacific Fishery Management Council
National Marine Fisheries Service
California Department of Fish & Game
California Coastal Commission

POINT REYES BIRD OBSERVATORY
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October 8, 1987

Paul M. Wolff
Assistant Administrator for Ocean Services
and Coastal Zone Management
National Ocean Service, NOAA
1825 Connecticut Avenue NW
Washington, D. C. 20230

Dear Mr. Wolff:

1 Thank you for providing us the opportunity to respond to the Draft EIS/MP for the Cordell Bank National Marine Sanctuary. Conceptually, the EIS is logically laid out. We fully support the establishment of the Cordell Bank National Marine Sanctuary, with the minimum boundaries as noted in the preferred alternative proposal, and we endorse the research and education plans as contained in the preferred management alternative. We strongly urge that the final resource management plans for the Sanctuary ensure the minimum disturbance of the natural resources and habitats to be protected under the proposed National Marine Sanctuary.

The three main goals of research, monitoring, and, especially, increasing public awareness of the Bank (p. 30) are desireable but require accurate, up-to-date information for success. The many inaccuracies in the Draft EIS/MP, however, generate some apprehension reletive to these goals. Examples of such inaccuracies include:

2 p. 10 & throughout. Use of name, Point Reyes--Farallon Islands National Marine Sanctuary, is not current. It is the Gulf of the Farallones National Marine Sanctuary.

3 p. 18. Storms come from west, with winds from south (30-40 knots); prevailing northwesterlies blow strong March-July (regularly to 30 knots).

4 p. 18-19. Upwelling occurs year round but is most persistent spring and summer.

Jets of upwelled water, particularly from Bodega Canyon (just to the north) often extend more perpendicular than parallel to average southward flow of the California Current. These jets of recently upwelled water may account for periods of increased water clarity.

5 p. 19. "Visibility about always >65 feet" is a statement applicable only to autumn.

6 The statement: "animal poplation depends on the food provided by these [red] algae" is false. Probably most of the benthic animals (except in fauna) are filter feeders which depend on plankton. Next paragraph is more accurate.

1. See Generic Response A.

2. The current name of the Sanctuary is the Gulf of the Farallones National Marine Sanctuary. However, at the time of writing of the DEIS/MP for Cordell Bank National Marine Sanctuary the old name was still in use. To be consistent, during the designation process for Cordell Bank, the old name of Point Reyes-Farallon Islands National Marine Sanctuary will be used.

3. This addition has been made in the FEIS/MP.

4. This correction has been made in the FEIS/MP.

5. This correction has been made in the FEIS/MP.

6. The statement has been deleted from the FEIS/MP.

7 p. 22-23. List of fish is woefully incomplete. Constitutes a list observed by Schmeider only. The list should be checked with the National Marine Fisheries Service, Tiburon Lab.

8 p. 29. Incomplete page.

9 p. 30. Third paragraph. Interesting statement in that the rockfish species which Briggs et al. (1985) describe as being so important to birds (S. jordani) is missing from Table 1! It should either be included or the inconsistency removed.

10 p. 31. Many inaccuracies in Table 4, as indicated.

11 p. 33. Paragraph 1. We suggest you check the assumption that rockfish dominate the commercial catch. Confirmation should be made with NMFS Tiburon Labs.

12 p. 46-47. In preceding pages emphasis was given to the benthic communities of Cordell Bank (which is justified), but also to rockfish, marine mammals (whales especially) and planktivorous seabirds (Cassin's Auklet).

Assuming that this emphasis was by design, a priority for baseline research should be an attempt to understand the dynamics of euphausiids as affected by physical oceanographic processes in the proposed Cordell Banks National Marine Sanctuary as well as in the Gulf of the Farallones National Marine Sanctuary. Euphausiids are a key component in the food web and are especially important in the diets of several species of abundant rockfish, salmon, whales, and planktivorous seabirds (NMFS & PRBO unpubl. data). For the past few years, NMFS-Tiburon has been researching the spatial and temporal dynamics of euphausiid abundance in the Sanctuaries, but in a woefully under-supported, though valiant, effort.

13 p. 48. A study of Northern (Steller) sea lions, such as the effort described, is not feasible and should not be undertaken. It requires study of diet which cannot be accomplished without much disturbance to the already precariously small number of sea lions.

We hope that you may correct these inaccuracies in future reports. Again, thank you for the opportunity of contributing our comments on and support for this important proposed National Marine Sanctuary.

Sincerely yours,

Laurie Wayburn
Executive Director

7. The lists and tables of species presented in the DEIS/MP is intended to be exemplificative and not exhaustive. However additions have been made to the Fishes Identified in Cordell Bank Waters in Table 1, based on discussions with the NMFS Tiburon Laboratory.

8. The missing text has been added to the FEIS/MP.

9. This fish species is common in the diet of the birds in the Central Californian area but no mention is made in Briggs et al. (1985) that Sebastes jordani was identified in the Cordell Bank area. Therefore it has not been added to Table 1.

10. These inaccuracies have been corrected in Table 4.

11. This Statement has been confirmed with the California Fish and Game. When all Rockfish species are combined they comprise the largest portion of the catch by weight by commercial fishermen at Bodega Bay and San Francisco Ports.

12. Comment accepted. NOAA encourages the input of all local expertise in the discussion of future research projects and priorities for funding of Sanctuary research and planning.

13. Comment accepted. Any studies of Northern sea lions or any other research project will only be undertaken in the Sanctuary by highly qualified personnel after extensive review by relevant parties.

TABLE 4: Seabirds Observed on Cordell Bank

Brachyramphus marmoratus	Marbled Murrelet
Branta bernicla	Brant
Catharacta maccormlicki	South Polar Skua
Cerorhinca monocerata	Rhinoceros Auklet*
Cepphus columba	Pigeon Guillemot*
Diomedea nigripes	Black-footed Albatross
Synthliboramphus hypoleucus	Xantus' Murrelet
Fulmarus glacialis	Northern Fulmar
Gavia arctica	Arctic Loon
G. immer	Common Loon
G. stellata	Red-throated Loon
Larus argentatus	Herring Gull
L. californicus	California Gull
L. canus	Mew Gull
L. heermanni	Heermann's Gull
L. hyperboreus	Glaucous Gull
L. occidentalis	Western Gull*
L. philadelphia	Bonaparte's Gull
L. thayeri	Thayer's Gull
Phalaropus lobatus	Red-necked Phalarope
P. fulicaria	Red Phalarope
Fratercula cirrhata	Tufted Puffin*
Oceanodroma homochroa	Ashy Storm-Petrel
O. furcata	Fork-tailed Storm-Petrel
O. leucorhoa	Leach's Storm-Petrel
O. melania	Black Storm-Petrel
Pelecanus occidentalis	Brown Pelican
Phalocrocorax auritus	Double-crested Cormorant*
P. pelgious	Pelagic Cormorant*
P. penicillatus	Brandt's Cormorant*
Ptychoramphus aleuticus	Cassin's Auklet*
Puffinus carneipes	Flesh-footed Shearwater
P. bulleri	Buller's Shearwater
P. creatopus	Pink-footed Shearwater
P. griseus	Sooty Shearwater
P. puffinus	Manx Shearwater
P. tenuirostris	Short-tailed Shearwater
Rissa tridactyla	Black-legged Kittiwake
Stercorarius parasitus	Parasitic Jaeger
S. pomarinus	Pomarine Jaeger
Sterna forsteri	Forster's Tern
S. hirundo	Common Tern
S. paradisaea	Arctic Tern
Synthliboramphus antiquus	Ancient Murrelet
Uria aalge	Common Murre*
Xema sabini	Sabine's Gull

*Species that breed on the Farallon Islands.

Corrections to R. W. Schmeider, 1985a.

San Francisco State University
1600 Holloway Avenue
San Francisco, California 94132

Department of Biology
415/338-1548

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Research Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

October 9, 1987

Dear Ms. Allin:

For the past several years my students and I have studied marine mammal distributions in the area of Cordell Bank and the Gulf of the Farallones. We are currently preparing two manuscripts concerning the work to date and look forward to continued research in this region. I have studied the draft statements with respect to establishing the Cordell Bank National Marine Sanctuary and am writing to you to indicate my support for the following aspects of the proposals:

1 | 1. Boundary Alternative #1, including the waters surrounding Cordell Bank, is the appropriate alternative in establishing this sanctuary. Lesser areas would be inadequate to the goals of the program.

1. See Generic Response A.

2 | 2. This designation should absolutely and totally ban ALL hydrocarbon activity within the sanctuary boundary from the inception of sanctuary. The irreplaceable resources of this area might take decades to substantially recover from accidents associated with such activity, and the proportionately minuscule return in terms of human fuel production does not begin to justify this risk.

2. See Generic Response B.

3 | 3. There should be substantial provision for on-site monitoring in the final document, with adequate funding for this work.

3. See Generic Response G.

4 | 4. Contact with shallow ridges in the Cordell Bank area, including anchoring of vessels, should be specifically prohibited.

4. See Generic Response D.

Thank you for taking time to consider my suggestions. All of us in my research group look forward to continuing to study the unique wealth of natural resources in the Cordell Bank area.

Sincerely

Hal Markowitz, Ph.D.
Professor

OCT 1987
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SIERRA CLUB
CALIFORNIA
1228 N STREET, SUITE 31, SACRAMENTO, CA 95814 (916) 444-6906

October 12, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avnue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

The Sierra Club of California supports the establishment of the Cordell Bank National Marine Sanctuary.

Cordell Bank's unique combination of nutrients, ocean currents and sunlight penetration allows it to support many different marine creatures. Unfortunately, it is also very vulnerable to accidents involving off-shore drilling, tanker spills and ocean dumping.

1
2 We urge the establishment of a marine sanctuary in the Cordell Bank using Boundary Alternative #1. We also urge the prohibition of all offshore oil and gas exploration or development within the whole sanctuary boundary.

Thank you for your consideration in this matter.

Sincerely,

M. L. Mesmer
Wildlife Committee Co-Chair

cc: Senator Alan Cranston
Senator Pete Wilson
Congresswoman Barbara Boxer
Congresswoman Nancy Pelosi
Congressman Douglas Bosco
Interested parties

1. See Generic Response A.

2. See Generic Response B.

Loma Prieta Chapter, Sierra Club
2233 Park Blvd.
Palo Alto CA 94306
327-8111 or 842-8

EXECUTIVE SECRETARIAT
1987 SEP 29 A 10:27
709:60

September 25, 1987

Ms. Vickie Allin, Acting Chief, Marine and Estuarine Management Division
OCRM, National Ocean Service/NOAA, 1825 Connecticut Avenue, NW
Washington, DC 20235

Mr. Edward Wilcynski, Acting Chief, Ecology and Conservation Division,
U.S. Department of Commerce, Room 6814, Washington DC 20230

Mr. C. William Verity, Jr., Secretary Designe, U.S. Department of Commerce
Washington, DC 20230

Gentlemen:

This Chapter of the Sierra Club strongly supports the creation of the proposed Cordell Bank National Marine Sanctuary. Few spots in our 4 billion acre OCS are blessed with the environmental advantages, particularly the nutrient rich water, required to support such an abundance of fish and wildlife.

1 2 We urge the adoption of "Boundary Alternative #1" which will provide the broadest area of protection. We also urge a full ban on all OCS oil and gas drilling activities from the beginning.

cc
Georgia Perkins
Rod Holmgren
Richard Charter

Very truly yours,

William S. Morris

William S. Morris, Chair
OCS Committee

1. See Generic Response A.

2. See Generic Response B.

SIERRA CLUB MARIN GROUP

Box 422, Inverness, Ca. 94937

October 9, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue N.W.
Washington, D.C. 20235

Re: Proposed Cordell Bank National Marine Sanctuary

Dear Ms. Allin:

The executive committee of Sierra Club Marin Group, at its regular meeting in October, unanimously approved the following motions:

-- We support establishment of the Cordell Bank National Marine Sanctuary as a means of protecting valuable marine resources;

1 -- We support the "Boundary Alternative #1" establishing an area of about 397 square miles because it will thus adjoin the existing Gulf of the Farallones National Marine Sanctuary and will provide the needed continuity of protection; and

2 -- We strongly support a ban on oil and gas leasing, exploration and development activities as part of the regulatory framework for the entire Cordell Bank National Marine Sanctuary from the beginning of its existence.

Cordell Bank lies off the coast of Marin County, as does the Gulf of the Farallones National Marine Sanctuary. We believe that needed protection for the whales, sea birds and valuable fishery resources will be best achieved by adoption of the new marine sanctuary with boundaries and preservation from oil or gas development as described above.

Sincerely,

Anne West

Anne West, Secretary
Sierra Club Marin Group

OCT 1987 RECEIVED

cc: Edward Wilcynski, Ecology & Conservation Div., U.S.Dept. of Commerce
C. William Verity, Jr., Secretary Designe, U.S. Dept. of Commerce

"We shall require a new manner of thinking if mankind is to survive." —Albert Einstein

1. See Generic Response A.

2. See Generic Response B.

MATTHEW A. BAILEY
P.O. Box 186
Dutch Flat, California 95714
(916) 389-2354

October 12, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
Washington, D.C.

Dear Ms. Allin,

1 2 In behalf of the Mother Lode Chapter of the Sierra Club, I wish to express support for the proposed Cordell Bank National Marine Sanctuary, west of Point Reys, California. In addition we support Boundary Alternative #1 and the prohibition on oil and gas development within the boundary.

We feel it is important that this unique ecological community this special protection.

Matthew A. Bailey
Chairman,
Wildlife Committee
Mother Lode Chapter
Sierra Club

1. See Generic Response A.

2. See Generic Response B.

SAN FRANCISCO BAY CHAPTER • SIERRA CLUB

ALAMEDA • CONTRA COSTA • MARIN • SAN FRANCISCO 6014 COLLEGE AVENUE OAKLAND CA 94618
BOOKSTORE (415) 658-7470 OFFICE (415) 653-6197 CONSERVATION (415) 653-6175

September 24, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Dear Ms. Allin,

The San Francisco Bay Chapter of the Sierra Club heartily supports the creation of the proposed Cordell Bank National Marine Sanctuary. Preservation of this unique marine environment offers a vital opportunity to protect our threatened marine resources. Cordell Bank is an "undersea island" with associated subsea rocky pinnacles. The combined factors of shallow depth allowing a high degree of light penetration for photosynthesis, and high nutrient concentration transported by local upwelling and surface currents creates a unique habitat for a wide variety of organisms. Thirty-eight species of fish inhabit Cordell Bank. Fourteen species of marine mammals, and at least forty-seven species of seabirds use the waters surrounding Cordell Bank as feeding grounds. Four endangered species, the humpback whale, the blue whale, the Brown pelican and the short-tailed albatross have been observed near Cordell Bank. This new Marine Sanctuary would provide an fascinating opportunity for scientific research and public education.

An important aspect to the creation of the Cordell Bank National Marine Sanctuary is the inclusion of an appropriate buffer zone around the Cordell Bank. The designation of Boundary Alternative #2 preserves only the immediate Bank environment and does not afford adequate protection from pollutants or other hazards that could easily drift into the sanctuary. Take the example of the 140 mile drift of the oil spill from the tanker Puerto Rican in 1984. The minimal area surrounding Cordell Bank in Alternative #2 offers no assurance of protection in the case of similar accidents or even accidents of a much smaller scale.

SEP 1987
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It also leaves an unprotected gap between the new sanctuary and the pre-existing Gulf of the Farallones National Marine Santuary. The choice of Boundary Alternative #1 not only offers a more appropriate buffer zone around the Bank, its boundaries would adjoin the existing Marine Sanctuary offering continuity of protection for the entire area. The designation of Boundary Alternative #1 thereby is the more logical choice for preserving the Cordell Bank. 1

As a National Marine Sanctuary, Cordell Bank requires absolute protection from potentially disastrous activities associated with oil and gas exploration and development. Interior Secretary Hodel's "deferred" area protects only the central core area of Cordell Bank and is only temporary. There is no assurance that the "deffered" area will continue to be protected after the five year period of his OCS Program. It is therefore vital that a full ban on all OCS oil and gas leasing and drilling activities be included in the regulatory framework of the Cordell Bank National Marine Sanctuary from the beginning. 2

The unique environment and rich concentration of marine life of Cordell Bank warrant preservation under the Marine Protection Research and Sanctuaries Act. The San Francisco Bay Chapter of the Sierra Club urges you to support the creation of Cordell Bank National Marine Sanctuary, adopt Boundary Alternative #1 and ban, from the beginning, all OCS oil and gas leasing, exploration, and development.

Thank you for considering our comments.

Sincerely,

Dana Kokubun

Dana Kokubun
Conservation Representative

DK/mf
cc: Jane Preskienis

1. See Generic Response A.

2. See Generic Response B.

SONOMA COUNTY GROUP
REDWOOD CHAPTER

319 Gate Way
Santa Rosa, CA 95401
October 5, 1987

Ms. Vickie Allin, Acting Chief
National Ocean Service/NOAA, Marine and Estuarine Management Division
Washington, D.C. 20235

re: proposed Cordell Bank National Marine Sanctuary

Dear Ms. Allin,

The Sierra Club Sonoma Group would like to express our wholehearted support for the creation of the Cordell National Marine Sanctuary. This rich undersea area supports a great deal of marine life which is increasingly impacted directly by such activities as commercial and sport fishing and boating, as well as indirect impacts from shipping (e.g. waste and fuel discharges and spills) and petroleum exploration (e.g. seismic testing, drilling mud discharges, hydrocarbon spills, etc.). Due to the nearby location and interrelated eco-systems (as exemplified by marine mammals and seabirds) with the Farrallon Islands, we recommend that Alternative #1 be chosen as the boundary for the new sanctuary so that the two areas are connected and no potentially disturbing activity can take place between them. 1

We also highly recommend that oil and gas exploration and drilling be specifically excluded from the proposed Sanctuary. The current 5 Year OCS Leasing Program does include areas that are much too close to the actual sea-mount, especially when you consider that such activities have considerable "spillover" such as air pollution, drilling mud discharges, petroleum spills and leaks. All of these "spillovers" can have major impact on a wide variety of marine organisms, birds and mammals. It does not make sense to wait to see what happens on future lease sales to decide what kind of protection is needed for the Sanctuary. We know <u>now</u> that oil and gas drilling is completely innappropiate for the Marine Sanctuary. Therefore, such protection should be written in from the beginning. 2

Thank you for this opportunity to comment on this proposal.

Sincerely,

Michael Krikorian, Chairman
Conservation Committee
Sierra Club Sonoma Group

1. See Generic Response A.

2. See Generic Response B.

Texaco USA
Central Exploration Division

PO Box 2100
Denver CO 80201
4601 DTC Boulevard
Denver CO 80237

September 17, 1987

RELOCATION OF TEXACO'S LOS ANGELES OFFICE

NOAA/NOS/OCRM
Marine & Estaurine Management Division
1825 Conn. Ave., N.W. Suite 714
Washington, D.C. 20235

Dear Sirs:

Effective immediately, Texaco has relocated its Universal City, CA exploration offices to Denver, Colorado. I will continue as Project Leader for the Offshore California Exploration Group. I report to Mark Cole, who is Regional Manager for the Southern Exploration District which includes, besides the California offshore, the California onshore and the Permian Basin. Mark reports to York LeCorgne who is Exploration Manager, who in turn reports to Joseph Butera, Central Exploration Division Vice President. Our office is located at the Denver Tech Center. The address is:

C. M. Clayton
Texaco Inc., Rm. 821
Offshore California Project
4601 DTC Blvd.
Denver, CO 80237
(303) 793-4268

Please update your records to reflect these changes. We look forward to continuing our relationship with you in our California OCS activities.

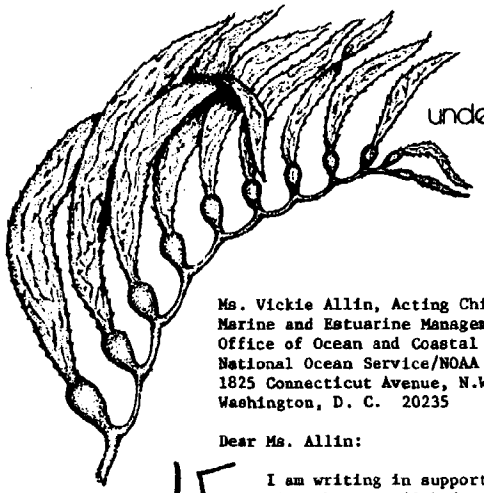
Sincerely,

C. M. Clayton/jat

C. M. Clayton

CMC:jat

No Response Necessary.



underwater photography & research
Ron Russo
marine biologist

October 7, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D. C. 20235

Dear Ms. Allin:

1 I am writing in support of Boundary Alternative #1 and for
2 a complete ban on all hydrocarbon activity within the sanctuary
boundary at Cordell Banks. I also think such provisions must be
a part of the sanctuary designation documents. Further, it is
3 my conviction that the Cordell Banks is a rare and unique national
treasure that requires additional funding for on-site monitoring,
and that provisions are added that bans all contact with the
4 ridge tops by anchoring. I urge you to make sure these measures
are adequately addressed in the enabling legislation, agreements,
and laws.

Cordell Banks requires stringent protection from economic interest. As a marine biologist, I am acutely aware of the significance of the discoveries made at the Banks. Oil exploration and drilling in the area can only have disastrous results for what we are beginning to understand is an underwater island of unique life forms.

Please act to ensure the implementation of these measures.

Sincerely,

Ron Russo

Ron Russo
Chief Naturalist
East Bay Regional Park District

RR/dm

1. See Generic Response A.

2. See Generic Response B.

3. See Generic Response G.

4. See Generic Response D.

Ms. Vickie Allin,
Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Ave, NW
Washington, DC 20235

September 26, 1987

Dear Ms. Allin,

I am writing in support of the creation of the Cordell Bank National Marine Sanctuary. The proposed sanctuary represents a unique ecosystem along the coast of North America - a temperate marine offshore bank. Its uniqueness is underscored by not only the unusual concentration of marine biological diversity but by new species of benthic fauna that have been discovered there, as well as observations of previously unrecorded species for this area and endangered species (the humpback and blue whales, the brown pelican, and short-tailed albatross).

1 Such an ecological treasure deserves the best protection our government can give it, which is why I am strongly urging that Boundary Alternative #1 be adopted to create a sanctuary with a good buffer zone. The need for such buffer zones becomes more important everyday, especially with the projected increase in offshore oil/gas development (entailing pollution from the disposal of drilling muds) and with every new oilspill. This alternative has the added advantage that its boundary would adjoin the existing Gulf of Farallones Sanctuary on two sides, providing an important **continuity** of protection not provided by Alternative #2. This alternative, if adopted with Management Alternative #2, would combine management and administration of these two sanctuaries and thus provide the most economical and effective method of experienced management to Cordell Bank.

2 Besides adopting these alternatives, the bank critically needs a ban on OCS oil and gas leasing, exploration, and development activities as part of the sanctuary's regulatory make-up from its very inception. Sec. Hodel's "deferred" area is too limited to adequately protect the bank's resources and is only temporary. Furthermore, the Secretary's past record of negotiation to balance environmental and energy concerns suggests that he cannot be counted on to ensure adequate protection of our environmental resources.

I strongly urge that this ban and these alternatives be adopted. Just one bad accident could wreak possibly irrevocable havoc on this unique ecosystem; it is important that we do all that we can to prevent such an event from happening.

I'd appreciate your comments; ~~and~~ Please includ~~ing~~ this letter ~~for~~ the public record. Thank you.

Sincerely,

Mary Ellen Harte

Dr. Mary Ellen Harte
Research Associate,
University of California at Berkeley

address: 1180 Cragmont Ave
Berkeley, CA 94708

1. See Generic Response A.

2. See Generic Response B.

UNIVERSITY OF CALIFORNIA, DAVIS

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BODEGA MARINE LABORATORY
(707) 875-2211

P.O. BOX 247
BODEGA BAY, CALIFORNIA 94923

6 October 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

Within the Draft Environmental Impact Statement/Management Plan marginal justification appears given for the establishment of the Cordell Bank National Marine Sanctuary (CBNMS). The invertebrate fauna on the bank is composed of both intertidal and subtidal species in zones separated by depth. At its shallowest, the bank is 19 fathoms, a deep and barely feasible sport dive. Over the bank is a diverse community of fishes including many rockfishes. Pinniped and cetacean species are listed as sighted at the surface above the bank. Yet I am unsure whether all of these species are sighted more often here than anywhere else along the coast of Northern California. Hopefully, these faunal attributes will attract enough public attention to justify the tax funds spent in management and administration of the Sanctuary.

1 If a sanctuary is established, Alternative 1 would provide the best boundary. This would adjoin the boundaries between the CBNMS and the Point Reyes/Farallon Islands National Marine Sanctuary (PRNMS). Both areas are not that different: shallow areas abound in the area between Southeastern Farallon Island and Cordell Bank. Is it really necessary to separate the two sanctuaries and give them different names? Alternative 2 may be the more appropriate and less costly mangement strategy, i.e., combining the management and administrative system of the CMNMS with that of the PRNMS.

2

Cordially yours,

A. Peter Klimley, Ph.D.
Asst. Res. Behaviorist

c.c.: Mr. Paul M. Wolff, Assistant Administrator for Ocean Services and Coastal Zone Management, National Ocean Service, NOAA.

1. See Generic Response A.

2. The two sanctuaries each contain uniquely distributed resources that require different types of regulation and protection. However the management structure will be the same for both Sanctuaries enabling a minimizing of additional resources to manage the new Cordell Bank National Marine Sanctuary.

Unocal Corporation
1201 West 5th Street, P.O. Box 7600
Los Angeles, California 90051
Telephone (213) 977 6810

ES87-163

UNOCAL 76

Carleton B. Scott
Director, Environmental Sciences

September 24, 1987

Ms. Vickie A. Allin
Acting Chief
Marine and Estuarine Management
Division
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, D.C. 20235

Dear Ms. Allin:

The National Oceanic and Atmospheric Administration (NOAA) recently proposed Cordell Bank National Marine Sanctuary regulations (52 FR 32563). In response to this publication and NOAA's request for comments on "Cordell Bank National Marine Sanctuary: Draft Environmental Impact Statement/Management Plan (May 1987)", hereinafter referred to as the DEIS, the Union Oil Company of California (Unocal) takes this opportunity to comment.

Unocal is a fully integrated, high technology earth resources company which, in part, explores for, develops and produces conventional crude oil and natural gas resources in the United States, Canada and overseas. Unocal, therefore, is very concerned with any action that potentially offers to limit access to lands, either onshore or offshore, that may possess hydrocarbon resources.

Unocal supports the designation of the Cordell Bank National Marine Sanctuary. This support is conditioned on NOAA's inclusion of the identified preferred actions in the Final Environmental Impact Statement/Management Plan and final regulations. Specifically and as set forth in the DEIS on pages 73-74, there should be no immediate regulation of hydrocarbon development activities.

1
2

1. See Generic Response A.

2. See Generic Response B.

Cordell Bank is not at present subject to leasing and the area of Cordell Bank within approximately the fifty-fathom contour has been excluded from the Department of Interior's five-year plan for the OCS Leasing Program (DEIS, page 73). In addition, and prior to any hydrocarbon production in the area, three additional Environmental Impact Statements/Assessments (EIS/EIA) must be developed. These are the Lease Sale EIS, the Exploratory Plan EIS/EIA and the Development Plan EIS. Each of these documents represents a process which provides for additional public input and scientific review. Specific permits associated with petroleum development activities, i.e., NPDES permits for discharges to marine waters and Corp. of Engineers 404 permits with Clean Water Act section 401 certifications, plus reviews conducted in compliance with the Endangered Species Act and the Marine Mammal Protection Act are intended to minimize and limit the adverse ecological impacts of OCS activities. Finally, should NOAA determine that protective criteria advanced through these statutory activities are insufficient to comply with the mandates of the Marine Protection, Research, and Sanctuaries Act, NOAA may promulgate emergency regulations or propose permanent regulations (52 FR 32563). Thus, the current exclusion of Cordell Bank in combination with existing statutory mechanisms support NOAA's preferred alternative. The immediate regulation of hydrocarbon development activities in the proposed Cordell Bank National Marine Sanctuary is unwarranted at this time.

Unocal appreciates this opportunity to comment on NOAA's proposal as expressed in the DEIS and 52 FR 32563. Should NOAA desire any clarification of these comments please contact Mr. Robert J. King, Jr. at (213) 977-6424.

Sincerely,

CBS:ss

cc: Mr. Edward Wilczynski
Acting Chief
Ecology and Conservation Division

3297k

Whale Center
NATIONAL OFFICE
3929 Piedmont Avenue, Oakland, California 94611
(415) 654-6621

WE WORK FOR THE WHALES AND THEIR OCEAN HABITAT

"Unless nations collectively and individually take bold and imaginative steps toward improved protection of the environment, the world must expect a troubled entry into the 21st century."

From the Global 2000 Report to the President

October 6, 1987

Ms. Vickie Allin, Acting Chief
Marine & Estuarine Management Division
Office of Ocean & Coastal Resource Management
National Ocean Service
NOAA
Washington, D.C. 20235

Dear Ms. Allin:

Enclosed for the record are the comments on the proposed designation of the Cordell Bank National Marine Sanctuary and draft EIS.

Thank you for your consideration of our views. We strongly support the sanctuary, but we feel equally strongly that all oil and gas exploration and development activity should be banned from the sanctuary boundary.

1
2

Sincerely yours,

Mark J. Palmer, Administrator

1. See Generic Response A.

2. See Generic Response B.

Whale Center
NATIONAL OFFICE
3929 Piedmont Avenue, Oakland, California 94611
(415) 654-6621

WE WORK FOR THE WHALES AND THEIR OCEAN HABITAT

"Unless nations collectively and individually take bold and imaginative steps toward improved protection of the environment, the world must expect a troubled entry into the 21st century."

From the Global 2000 Report to the President

WHALE CENTER STATEMENT OF SUPPORT FOR A CORDELL BANK NATIONAL MARINE SANCTUARY Sept. 30, 1987

The Whale Center has been a strong supporter of the development of the National Marine Sanctuary System of the Department of Commerce. We have helped establish the two California sanctuaries, the Channel Islands National Marine Sanctuary and the Gulf of the Farallones National Marine Sanctuary. We have further helped develop and promote education programs, research projects, and interpretive tools for our local sanctuary.

The Whale Center strongly supports the designation of Cordell Bank of California as a National Marine Sanctuary. This spectacular pinnacle of undersea geography and living gardens, of feeding grounds for whales, dolphins, and marine birds, deserves national recognition and the fullest protection possible.

However, we are concerned with some aspects of the Draft Designation Document and Environmental Impact Statement. We feel some aspects of the preferred alternative do not provide sufficient protection for the Cordell Bank area.

Sanctuary Boundaries:

3 The preferred alternative boundary (#2 Alternative, Boundary Alternative 2) would provide protection for the core pinnacle area of Cordell Bank and the feeding area of marine mammals and birds by encompassing an area 3 miles beyond the 50 fathom isobath. Boundary Alternative 1, on the other hand, does have

3. See Response No. 1.

advantages from a management standpoint. This alternative links up the northern extension of the Gulf of the Farallones National Marine Sanctuary at Bodega Head with the northern extension of the Cordell Bank area, providing a complete, contiguous sanctuary boundary subject to regulation and control in a much more logical boundary. We urge the Commerce Department to consider the larger boundary from a management standpoint, to ensure that the whole coastal and Cordell Bank/Farallones ridge are protected.

Offshore Oil Restrictions:

The Draft Environmental Impact Statement discusses the concerns about Offshore Oil Exploration and Drilling on pages 34, 42, 73, and 84-85. At present the Draft Designation Document proposes no regulations to prohibit oil and gas activity in the Sanctuary. Instead, reference is made to the OCS 5 Year Plan developed by the Department of Interior's Minerals Management Service. We feel this protection is totally inadequate, and urge that the Commerce Department either draft a regulation to exclude oil and gas development from the Sanctuary or amend the 5 Year Plan to exclude OCS activity from the Sanctuary.

4

4. See Response No. 2.

Under the OCS 5 Year Plan, oil and gas exploration and drilling are only deferred "within the 91 meter (49.76 fathoms) isobath" (DEIS page 34). The preferred alternative (Boundary 2) would extend for 3 miles on all sides of this core area. Within this buffer zone, the prime feeding habitat for marine mammals and birds (including 3 endangered species -- the humpback and blue whale, and the brown pelican), "(i)f exploration and development activities were to occur in the area beyond the fifty-fathom zone, they could be monitored to assess the likelihood of spills. Precautions could be taken to minimize spill-risk and to improve contingency planning to reduce the impact of any spills that did occur." (DEIS page 84-85).

These statements are totally inadequate. We strongly feel that all OCS activity should be excluded from the Sanctuary boundary, as is the case now with the other two existing California National Marine Sanctuaries. We are at loss to understand why Cordell Bank does not have the same protections.

As we have seen from the explosion of the tanker Puerto Rican and the recent sinking of the freighter Pacbaroness off Santa Barbara, oil spills on the high seas cannot be contained under present technology. Sanctuaries like Cordell Bank should not be put at risk from the threat of offshore oil drilling. In addition, current clean-up technology does not deal with oil that sinks -- oil clean-up efforts are confined to dealing with surface slicks. Therefore, any clean-up effort at Cordell Bank would not even address the impacts on the subsurface benthic organisms that are unique to the area. Furthermore, offshore oil drilling is conducted with drilling muds containing many contaminants (including heavy metals) potentially lethal to underwater filter feeding organisms characteristic of Cordell Bank -- the DEIS makes no mention of this hazard. Sound pollution from OCS activity has raised problems in the Beaufort Sea with bowhead whales. In summary, the DEIS is inadequate with respect to the real hazards OCS activity poses to the marine life of Cordell Bank, and the Draft Designation Document does not provide the regulatory mechanism sufficient to protect Cordell Bank from OCS activity.

To repeat, the Whale Center believes that oil and gas exploration and development activities should be excluded from Cordell Bank National Marine Sanctuary, and we urge the Department of Commerce to develop a regulation identical to existing regulations for the two existing California National Marine Sanctuaries.

Other OCS Issues:

The draft EIS proposes basing oil spill clean-up vessels and contigency efforts in San Francisco Bay. The Whale Center suggests that such vessels and gear should be based in Bodega Bay, as the harbor is closer to Cordell Bank and more readily accessible due to prevailing current and wind patterns. Clean-up efforts from San Francisco Bay will be hampered by wind and sea conditions in approaching Cordell Bank.

We have already discussed above the problems with clean-up technology relative to underwater resources like the benthic organisms characteristic of Cordell Bank.

Of considerable concern with this regard are the proposals in the Department of Interior's OCS 5 Year Plan for leasing and oil activity in the Bodega Basin north of Cordell Bank. The potential exists for oil spills and other pollutants to be carried down to Cordell Bank by prevailing conditions of wind and waves. While the regulation of OCS activity outside of the Sanctuary boundary is beyond the scope of these hearings, we did feel we should point out the problem, as problems beyond the control of the Department of Commerce could render the sanctuary meaningless.

Staffing:

5 The Whale Center strongly supports adequate human resources to manage Cordell Bank and the other sanctuaries in the system. The DEIS does not, we feel, place enough attention on the need for monitoring of the sanctuary (particularly pollution incidents and illegal use of gill nets). We also feel that Cordell Bank will provide a unique opportunity for interpretation of the offshore areas of our coastline, and feel adequate resources should be provided to develop public use of the Bank and public understanding and education of the Bank's wonders. During the budget process,

5. See Generic Response G.

adequate funding must be provided to fund activities for the Cordell Bank National Marine Sanctuary and other sanctuaries.

In conclusion, the Whale Center strongly supports the proposal for a Cordell Bank National Marine Sanctuary. We feel the larger boundary range should be considered. We feel very strongly that all offshore oil and gas exploration and drilling should be excluded from the sanctuary. Adequate resources must be provided for management, interpretation, research, and enforcement of protection at Cordell Bank and other National Marine Sanctuaries.

We look forward to working with the Marine Sanctuary Office on the Cordell Bank proposal -- it's been a long time coming! Thank you for your consideration of our views.

# # # # #

For information on Cordell Bank, contact Mark J. Palmer, Whale Center, 3929 Piedmont Ave., Oakland, CA 94611 (415) 654-6621.

THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGION

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, NW
Washington, D.C. 20235

Dear Ms. Allin:

The Wilderness Society would like to comment on the Draft Environmental Impact Statement, Draft Management Plan and Proposed Rule for Cordell Bank National Marine Sanctuary. This unique and fragile area must be protected from possible adverse human activities such as off-shore drilling, tanker spills and ocean dumping. Therefore, we strongly support Alternative #2 and Boundary Alternative #2 to designate this area as a sanctuary. 1

We further request that the sanctuary regulations be strengthened by prohibiting any off-shore oil and gas exploration and development withing the whole sanctuary boundary. 2

Please keep us informed of your decision in this matter.

Sincerely,

Patricia Schifferle

Patricia Schifferle
Regional Director
California/Nevada

cc: Mr. Edward Wilczynski
The Honorable C. William Verity
Senator Alan Cranston
Senator Pete Wilson
Congresswoman Nancy Pelosi
Congresswoman Barbara Boxer
Interested parties

1. See Generic Response A.

2. See Generic Response B.

1791-A PINE STREET, SAN FRANCISCO, CALIFORNIA 94109 TELEPHONE (415) 771-2020

GOVERNMENT COMMENTS

BARBARA BOXER
6TH DISTRICT, CALIFORNIA

COMMITTEE ON THE BUDGET

COMMITTEE ON ARMED SERVICES

SELECT COMMITTEE ON CHILDREN, YOUTH, AND FAMILIES

WHIP AT LARGE

Congress of the United States
House of Representatives
Washington, DC 20515

307 CANNON BUILDING
WASHINGTON, DC 20515
(202) 225-8161

DISTRICT OFFICES:
450 GOLDEN GATE AVENUE
SAN FRANCISCO, CA 94102
(415) 620-6943

88 BELVEDERE STREET
SAN RAFAEL, CA 94901
(415) 457-7272

421 STARR AVENUE
VALLEJO, CA 94590
(707) 552-0720

SONOMA
(707) 763-8033

September 30, 1987

TESTIMONY OF
CONGRESSWOMAN BARBARA BOXER
IN SUPPORT OF CREATION OF THE
CORDELL BANK NATIONAL MARINE SANCTUARY

As the Representative of the Congressional District adjacent to the proposed Cordell Bank National Marine Sanctuary, I would like to welcome this hearing panel to our District. I have long been an advocate of the National Marine Sanctuary Program, and when I served on the Marin County Board of Supervisors, I worked in support of the creation of the present Gulf of the Farallones Sanctuary now in existence.

This unique area is blessed with a rich and productive marine environment, and the economic health of our local communities is closely tied to the health of our coastal waters. At the local government level, in the State Legislature, and in the Congress, I think that you will find that we make the protection of our coastal resources one of our very highest priorities.

It is within this context that I would like to express to you my unlimited support for the creation of the proposed Cordell Bank National Marine Sanctuary. Designation of this area as a new National Marine Sanctuary is certainly in keeping with its status as a national treasure.

Further, I would like to encourage adoption of the Boundary Alternative One outlined in the Draft Environmental Impact Statement. The broadest possible protection is needed for the waters of Cordell Bank, and Boundary Alternative One provides a complimentary format which matches the present Gulf of the Farallones Sanctuary boundaries. To leave an unprotected gap between the two Sanctuaries is highly inadvisable.

I have been part of the Congressional Negotiating Team which has worked for the past two years with Interior Secretary Donald Hodel, trying to convince him to moderate his offshore drilling plans. I can tell you that, based on my experience in that process, strong and contiguous administrative protections are needed for our coastal waters. To leave an unprotected gap

1. See Generic Response A.

invites problems at a later date.

2 I also feel that it is extremely important to include a total ban on all OCS development activities from the very outset, and to apply this ban to all waters of the new Cordell Bank Sanctuary, and not just to the Bank itself. Secretary Hodel is taking only the narrowest interpretation of buffer zones in his new Five-Year OCS Program. Quite frankly, his so-called buffer zones are insufficient in terms of providing any meaningful protection for biological resources. To fail to provide an OCS development-activity ban within the total Cordell Bank Sanctuary because the Department of Interior has deleted the immediate Bank itself from the new Five-Year OCS Program implies that we should trust the Interior Department. I can tell you, again from direct experience, that the Interior Department should not be trusted in these matters.

In July of 1985, the Secretary said that he wanted to protect most of the central and northern California coast from offshore drilling, including all of the waters around Cordell Bank. A month later, Mr. Hodel changed his mind. He should have no problem whatsoever accepting an OCS development ban within your modest proposal represented by Boundary Alternative One. Such an OCS development ban must preclude all exploration, leasing, development, and pipeline construction. This area is, quite simply, too sensitive to place at risk.

In conclusion, I would like to reiterate my appreciation to you for holding these hearings on this timely proposal.

Thank you for your attention.

2. See Generic Response B.

NANCY PELOSI
6TH DISTRICT, CALIFORNIA

1632 LONGWORTH BUILDING
WASHINGTON, DC 20515-0505
(202) 225-4965

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COMMITTEES
BANKING, FINANCE AND URBAN AFFAIRS
GOVERNMENT OPERATIONS

Congress of the United States
House of Representatives
Washington, DC 20515-0505

October 9, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

This is to add my comments to the public record regarding the Draft Environmental Impact Statement for the Cordell Bank National Marine Sanctuary.

This marine environment is known for its abundant natural resources, including fourteen species of marine mammals and forty seven other species of seabirds. The humpback and blue whales, now endangered, are among these.

Designation of this area as a sanctuary would insure the preservation of its recreational, ecological and esthetic values. It would also address the important question of offshore energy development by offering protection to this unique biological area.

1 2 According to the information I have reviewed, it appears that Boundary #1 would offer the greatest protection to this area. Additionally, I wish to stress the importance of restricting energy exploration within this proposed boundary. Tragic events in recent years have highlighted the increased danger of oil spills and contamination of marine life. It would be counterproductive to attempt to create a sanctuary while, at the same time, allowing oil and gas development within the boundary of the proposed Cordell Bank National Marine Sanctuary.

I hope you will keep these comments in mind as you review the DEIS and that you will act to offer this area the maximum protection possible.

Thank you for your consideration of this request.

Sincerely,

Nancy Pelosi

NANCY PELOSI
Member of Congress

1. See Generic Response A.

2. See Generic Response B.

RECEIVED
SECRETARY'S OFFICE
1987 OCT 20 AM 11: 11

United States Senate
WASHINGTON, DC 20510

ARMED SERVICES
AGRICULTURE, NUTRITION, AND FORESTRY
COMMERCE, SCIENCE, AND TRANSPORTATION
SPECIAL COMMITTEE ON AGING
JOINT ECONOMIC COMMITTEE

EXECUTIVE SECRETARIAT
OFFICE OF THE SECRETARY
1987 OCT 20 P 12: 26

709725

October 19, 1987

The Honorable C. William Verity, Jr.
Secretary
Department of Commerce
Washington, D.C. 20230

Dear Mr. Secretary:

I am writing in support of the proposed Cordell Bank National Marine Sanctuary off the coast of Northern California.

This unique undersea environment can provide an outstanding "living laboratory" for scientific researchers and for public education. The undersea pinnacles and the abundant light due to the shallow depth allow a large variety of marine life to thrive there. Over 50 different species of fish and marine mammals are said to inhabit the Cordell Bank.

1 I am also quite concerned that the Cordell Bank be given adequate protection from any future off-shore oil and gas production. Many individuals and groups have expressed their desire to see Boundary Alternative #1 adopted to allow for
2 increased protection from pollutants and other hazards that could drift into the sanctuary. I hope you will give their concerns your full attention.

Thank you for your consideration in this matter.

Sincerely,

Pete Wilson

PETE WILSON

PW:sa

1. See Generic Response B.

2. See Generic Response A.

September 16,1987

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

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
National Ocean Service
NOAA
1825 Connecticut Avenue, N.W. Suite 714
Washington,D.C. 20235

Dear Ms. Allin,

First I want to thank you for the opportunity to review and provide comment on the Draft Environmental Impact Statement/Management Plan for the Cordell Bank National Marine Sanctuary. As you may know my research colleagues and I at the NMFS Tiburon Laboratory have been conducting research on the rockfish (Sebastes spp.) populations in the Gulf of Farallons and Cordell Bank for over three years. We have developed considerable interest in the conditions of these populations and have found the Cordell Bank to be a unique and valuable habitat. Your efforts to protect the resources of this place through creation of a National Marine Sanctuary are laudable.

It is not our usual duty to review documents such as this. So I will not address technical aspects relating to adequacy, suitability and such. I do, however, have some general and specific comments from the perspective of a research fishery biologist - the bias will be obvious.

General comments:

1. Most of your descriptive information on the Bank comes from Bob Schmieder and his Cordell Bank Expedition. He and his group have done a great job in compiling information and creating a public awareness of Cordell Bank. Until a few years ago they were the only people working there. I must confess that I find it interesting that within our agency there is so little communication between groups working in the same geographic area and with the same interests. There is considerable information on the oceanography and the groundfish populations (primarily rockfishes) in the regions of concern which has been produced by the NMFS Southwest Fisheries Center. For instance, the Physiological Ecology Investigation of the Tiburon Laboratory has been sampling the yellowtail rockfish population at Cordell on a monthly basis for 2 1/2 years and seasonal research cruises have explored this area for at least 8 years. In our particular work we are studying the reproductive biology of yellowtail RF in relation to their physiological condition. It appears from our results that Cordell may very well be a unique habitat. There are some conditions and disease states within the fish populations which are unlike those in other Pacific coast populations. There is a real need to coordinate the available scientific information and the research activity of Cordell Bank researchers. Your

1 proposal could help meet this need. We would like to be included in the process and the final organization that results from the creation of the sanctuary. I think we have a lot to contribute.

2 2. Why is it necessary to create a new and seperate sanctuary for Cordell when it borders on an existing sanctuary? It would seem easier and logical to just add it to the Point Reyes-Farallon Islands National Marine Sanctuary.

3 3. One outcome of our research at Cordell that has impressed us is the complexity and uniqueness of the habitat and how little we know about it. The estimated research budget of $65K per annum seems inadequate to cover the range of research proposed. For example, it costs us $1000/day to charter a vessel to collect fish. When you consider subsequent lab work, salaries, etc. money does not last long.

Specific Comments:

1. Enforcement is a problem at Cordell. Any proposed new regulations concerning activities there will require some thought and probably money to provide adequate enforcement. Both California Dept. of Fish and Game and the Coast Guard have their hands full now.

4 2. Page 6. The statement about the lack of threat to fish at Cordell may not be supportable. There are some preliminary indications of overfishing in the rockfishes. No one is looking at the potential problem but it warrants concern.

5 3. Page 23. Here are some additions to your list of Cordell Bank fishes:
Greenspot rockfish, Sebastes rosenblatti
Greenstripe rockfish, S. chlorostictus
Chilipepper rockfish, S. goodei
Rock sole, Lepidopsetta bilineata
Spiny dogfish, Squalus acanthias.

6 4. Page 24. Lingcod spawning season is usually late fall through early winter.

7 5. Page 24. Yellowtail rockfish do not prey on jack mackerel.

8 6. Page 29. There is some text missing from the bottom of the page.

9 7. Page 42. Perhaps I am naive, but it seems the military should not be exempt from any discharge or developmental requirements in this area unless they can demonstrate in public how Cordell is necessary for national defense.

10 8. A table listing acronyms would help. It is almost another form of language.

9. Page 53. For possible distribution points for information to the public the UC Bodega Marine Laboratory has been selected for

1. Comment accepted. NOAA agrees with the importance of a coordinated research effort and encourages the participation of the NMFS Tiburon Laboratory in the development of the Sanctuary's overall management and research programs.

2. The two sanctuaries each contain uniquely distributed resources that require different types of regulation and protection. However the management structure will be the same for both estuaries enabling a minimization of additional resources to manage the new Cordell Bank National Marine Sanctuary.

3. See Generic Comment G.

4. See Generic Comment I. NOAA encourages and will supporty to the degree possible fisheries research on Cordell Bank, including studies of commerically valuable fish stocks.

5. These additions have been made in the FEIS/MP.

6. This correction has been made in the FEIS/MP.

7. This correction has been made in the FEIS/MP.

8. This text has been added to the FEIS/MP.

9. The proposed regulations do not prohibit any activity conducted by the Department of Defense (DOD) that is essential for national defense or because of emergency. Such activities shall be conducted consistently with the Sanctuary regulations to the maximum extent practicable. NOAA has no information to indicate that military operations, as currently conducted in Sanctuary waters injure its resources. However, NOAA shall continue to consult with the DOD to maintain awareness of military operations in Sanctuary waters and to inform the military of sensitive marine habitats. NOAA will closely monitor all activities and increase the public's as well as DOD's awareness of the need to protect the resources of the Sanctuary.

10. A table of acronyms has been added to the FEIS/MP.

11 a new site for the NMFS Tiburon Laboratory. If(when?) this takes place, one might give it a consideration since the mission of this lab is to study groundfishes along this coast.

12 10. Page 84. From years of research in oil pollution effects I concluded long-term chronic exposures were much more threatening to a marine community than the occasional, and often rare, catastrophic spill. One might want to consider potential threats of such exposures ahead of spills. Nearby shipping activity, exploratory drilling, mineral development, and a proposal for placement of a major municipal sewage outfall at Bodega serve as examples.

I hope these comments are of use to you and your efforts. Please keep us informed of this proposal. We wish to cooperate wherever possible.

Sincerely,

Maxwell B. Eldridge
Superv. Fish. Biol.
NMFS- Tiburon Lab.
3150 Paradise Dr.
Tiburon, CA 94920

cc: Mr. Edward Wilczynski, Acting Chief
Ecology & Conservation Division
National Ocean Service, NOAA
U.S. Department of Commerce, Rm. 6814
14th & Pennsylvania Avenues
Washington, D.C. 20230

11. One of the main purposes of Sanctuary Designation is to enhance public awareness and appreciation of the marine environment. NOAA will consider the University of Califorina's Bodega Marine Laboratory as a possible location for public contact to achieve the goal of increasing public awareness and understanding the significance of the Sanctuary and the need to protect its resources.

12. See Generic Responses H, B, and C. NOAA fully recognizes the threat of long term chronic exposure to low levels of pollution and intends to intitiate a program to monitor the status of the Sanctuary's resources.

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

Southwest Fisheries Center
P.O. Box 271
La Jolla, California 92038

September 28, 1987 F/SWC1

Ms. Vickie Allin
Acting Chief,
Marine and Estuarine Management Division
Office of Ocean and Coastal Resources Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

I have reviewed the draft environment impact statement/draft maanagement plan sent for the proposed Cordell Bank National Marine Sanctuary. I found the plan to be sound and comprehensive, the major considerations well accounted for, and the Cordell Bank area to be a good candidate for a National Marine Sanctuary. I support the described preferred boundary of the Sanctuary (Alternative 2), as well as the preferred management and regulatory alternatives.

If you have further questions, don't hesitate to let me know.

Sincerely,

Aleta A. Hohn, Leader
Life History Monitoring Project

cc: E. Wilczynski

1. See Generic Response A.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
300 South Ferry Street
Terminal Island, California 90731

October 6, 1987 F/SWR33:SJK

MEMORANDUM FOR: N/ORM2 - Vickie Allin

FROM: F/SWR - E.C. Fullerton

SUBJECT: Draft Environmental Impact Statement/Management Plan, Cordell Bank National Marine Sanctuary

We have reviewed the subject document (DEIS/MP) and do not find the preferred regulatory alternative to be acceptable as proposed.

As discussed in the document, Cordell Bank supports a unique ecosystem with an abundance of organisms including some rare and previously unknown varieties. Marine mammals, including endangered whales, also are observed in waters over and adjacent to the Bank. We, therefore, concur that Cordell Bank warrants designation as a National Marine Sanctuary.

Upon designating Cordell Bank a National Marine Sanctuary, the Management Plan should ensure the protection of biological resources found there. Unfortunately, the draft plan proposed in the DEIS/MP falls short of providing such protection in several ways.

First, there is the lack of restrictions on hydrocarbon development activities within the sanctuary. Such restrictions are in place for the Point Reyes-Farallon Islands National Marine Sanctuary (PRNMS) located immediately south of Cordell Bank. The vague intent to promulgate regulations, or possibly to prohibit such operations in the future does not ensure that such restrictions would be developed and enforced. As presently specified in the DEIS/MP, it appears that the fate of potential oil and gas activities within the proposed sanctuary lies primarily with the U.S. Department of the Interior's future decisions on whether or not to offer the area for leasing.

Because of these concerns, we do not support the preferred regulatory alternative for hydrocarbon activities, Alternative C3(a), described on page 74 and elsewhere in the document. We do not think that oil and gas operations should be allowed within the proposed sanctuary because of potential adverse impacts on the biological resources of the Bank. However, we would support, and do encourage the adoption of Alternative C3(b) provided it is amended to reflect the change, "... a regulation would be promulgated prohibiting oil and gas development within the sanctuary boundaries." Also, the monitoring concept discussed

1. See Generic Response B.

probably should be eliminated unless it is determined that the Marine Protection, Research and Sanctuaries Act can require monitoring of oil and gas activities occurring outside the boundaries of a designated sanctuary.

2 Second, we find the provisions for enforcing sanctuary regulations for the protection of marine resources to be vague, if not lacking. There is no provision for an enforcement officer as presently exists for the PRNMS. Rather, under this plan, enforcement of regulations for protecting these resources would be left to other agencies as an additional item under their broad responsibility for enforcing Federal and State laws. This plan would not provide sufficient protection of resources, and we believe that an enforcement plan such as that for the PRNMS, with well described authorities and functions, should be formulated and implemented.

2. See Generic Response G.

3 Third, we think that the proposed Cordell Bank Sanctuary should consist of all the area contained within Boundary Alternative 1, described on pages 64 and 65. This boundary would join that of the PRNMS, establishing a single large area, which could be managed as a unit. This would allow for better management and better enforcement of sanctuary regulations, since one large unit would have more easily definable and enforceable boundaries. In addition, this would assure a protected buffer zone between Cordell Bank and the PRNMS and also provide additional protection for marine mammals that frequent the entire area, not only the area within the proposed sanctuary boundary (Boundary Alternative 2).

3. See Generic Response A.

4 Finally, the proposed Management Plan specifies that removing or damaging benthic organisms within the proposed sanctuary, except for research or educational purposes, would be prohibited. The plan should clearly acknowledge that commercial and recreational fishing will be activities excluded from the scope of such sanctuary regulations, and will continue to be administered under existing State and Federal authorities. This is consistent with the management regime established for the Point Reyes - Farallons Sanctuary.

4. See Generic Responses E and I.

If there are questions regarding these comments, please contact Sari Kiraly of my staff, at the National Marine Fisheries Service, 777 Sonoma Avenue, Room 325, Santa Rosa, California 95404; telephone (707) 525-4275.

cc:
F/PR - Nancy Foster ✓

Telephone
9/9/'87

Jno Skillings NOS 4438213

Coast Pilot Section
boundary coordinates lat°
seconds column should be 16.78
59.88
put ~~to~~ decimal pts. in 54.53
etc.
for navig purposes round off to one decimal
" legal " leave as 2

1. This correction has been made in the FEIS/MP.

U.S. DEPARTMENT OF COMMERCE

8/28

To : Bill Windom

From: [illegible]

Capt. Julian Wright [illegible] the Naval [illegible] [illegible] to say he had reviewed the Cordell [illegible] and had no comment. He specifically agrees with the paragraphs in DOD.

1. No Response Necessary.

TRANSMITTAL FORM CD-[illegible] (10-67)
PRESCRIBED BY DAO [illegible]

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

OCT 2? 1987

In Reply Refer To:
ER-87/1066

Vickie R. Allin
Acting Chief, Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service
National Oceanic and Atmospheric Administration
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Dear Ms. Allin:

The Department of the Interior has reviewed the proposed Cordell Bank National Marine Sanctuary regulations (published in the Federal Register on August 28, 1987), and the supporting draft environmental impact statement (EIS). Our specific comments (enclosed) are divided into two parts: Comments on the proposed rules; and comments on the draft EIS. General comments follow.

1 Overall, Interior supports the concept of establishing a marine sanctuary at Cordell Bank. The Bank area contains important ecological, research, and recreational values that warrant protection from certain unregulated activities which may adversely affect its resources. However, designation of Cordell Bank as a national marine sanctuary should not be used as a mechanism for developing regulatory programs that duplicate any of those currently in effect.

2 We acknowledge that the National Oceanic and Atmospheric Administration (NOAA) is not planning to address offshore oil and gas development activities in the sanctuary regulations. However, the proposed rule does indicate that hydrocarbon-related regulations may be considered in the future. It will not be necessary or appropriate for NOAA to place restrictions on oil and gas activities authorized by Interior because we already have mechanisms in place for ensuring that resources of Cordell Bank will be adequately protected from potential adverse impacts caused by those activities.

Thank you for the opportunity to comment on the proposed regulations and the draft EIS.

Sincerely,

Martin L. Smith
Deputy Assistant Secretary,
Policy, Budget and Administration

Enclosure

1. The diverse and abundant resources at Cordell Bank warrant an areal system of protection provided by designation as a National Marine Sanctuary. NOAA does not intend to add unnecessary regulations or layers of authority to the management of the Cordell Bank ecosystem. The added protection is intended to fill the gaps between existing laws and to provide a coordinated program of on-site management.

2. NOAA does not intend to regulate any oil and gas activities at the time of designation. NOAA also agrees that there are many regulatory mechanisms, some administered by the Department of the Interior, to protect the marine environment. Also see Generic Response B.

Enclosure

Detailed Comments on Proposed Regulations and
Draft Environmental Impact Statement(EIS)/Management Plan
for the Cordell Bank National Marine Sanctuary (NMS)

COMMENTS ON PROPOSED REGULATIONS

1. General comment on applicability and coverage of the regulations.

3

As written, it is unclear whether the regulations would apply only within the 50 fm isobath, and which user groups they would apply to. For example, it must be clarified whether hydrocarbon development regulations that may be developed in the future would apply outside the 50 fm isobath but within the 3 nm preferred sanctuary boundary. We believe it is appropriate to apply the rules to all user groups, but limit the scope to areas within the 50 fm isobath. Both issues need to be clarified.

3. See Generic Response E.

2. Section 942.6(a)(1). Depositing or discharging materials or substances.

4

With the exception of solid wastes, vessel discharges of "materials or substances" (e.g., oil or other toxic substances) are covered by existing laws and regulations. Therefore, it will be unnecessary to "layer" additional regulations onto the existing ones. If unregulated discharges are to be addressed, they should be specifically identified. For example, disposal of "nonbiodegradable" materials should be one focus of the regulations. Further, the regulations should take into consideration the accidental and unavoidable discharge of material such as fishing gear. It would be appropriate to limit this regulation to "deliberate" disposal of prohibited materials.

4. See Generic Response F.

3. Section 942.6(a)(2). Removing or damaging resources.

5

In most cases the draft EIS indicates that this regulation would provide for the prohibition of "deliberate" removal or damage to "benthic resources." However, the proposed regulation is unclear as to what constitutes "deliberate" and what is included as a "benthic resource." The rule should be clarified to address the following questions: 1) Does deliberate removal exclude accidental situations in which the commercial trawler hangs up on or drags the bottom? 2) Does deliberate damage exclude damage due to a dropped or dragging anchor? 3) Do benthic resources include only algae and invertebrate species (i.e., are all fishes including those not specifically covered by the Fishery Management Plan exempt from the regulation)?

With respect to fishing, it is a known and predictable fact that damage will occur to "benthic resources," and some benthic resources not regulated by the Fisheries Management Plan will be captured incidentally, given the nature of some fishing activities. While there are indications that fishing, per se, will be subject only to existing regulations and not be further addressed in Article 4 of the sanctuary designation document, it is unclear how activities related to fishing or fishing vessels will be affected by the regulations, particularly as they apply to anchoring, trawling, and incidental catch.

5. See Generic Responses I, E and D.

With respect to the "attempting to remove or removing" provision, it appears to be a "blanket" and nonspecific prohibition directly aimed at divers who might remove Allopora for commercial use. However, the terminology used is vague and includes all benthic organisms. As a result, many activities including commercial fishing and pleasure boating may be affected by the proposed regulations due to the nature of the activities. Finally, if non-diving activities are to be covered, the regulation should include a provision to ensure protection of the benthic organisms from damages caused by anchoring.

Considering the number of potential diving days on the Bank and the limited bottom time of divers, it is difficult to understand how divers would pose a significant threat to benthic resources other than Allopora. If the intent of the regulation is full protection of Allopora, it should specify this resource, while not categorically excluding "other" resources.

COMMENTS ON THE DRAFT EIS AND MANAGEMENT PLAN.

1. Lack of emphasis:

It appears that "strengths" and "highly significant" aspects of the Bank have been underrated or have not been emphasized. In particular, stronger statements may be necessary to justify the proposed designation action. There are numerous factors that could be highlighted particularly under the heading of "Purpose and Need for Designation." These "highlights" may include:

6

a. The unusual combination of oceanic conditions and undersea topography represented within the confines of the proposed Cordell Bank NMS. These unusual conditions of high productivity and presence of a variety of microhabitats have lead to an unusually diverse community;

b. Habitat and foraging areas for a variety of commercially and/or recreationally important fishes;

c. The utilization of Cordell Bank as a foraging area for marine mammals and seabirds which may concurrently utilize the varied habitats of nearby Point Reyes-Farallon Island NMS for additional (nesting) or similar (feeding) activities;

d. An important and significant habitat for new, rare, and/or endangered species; and

e. Cordell Bank would provide a relatively pristine site in which to initiate research studies and/or act as a control site to complement other research studies. Sanctuary designation would assure an organized funding plan for this unique area.

6. Comment accepted. NOAA agrees that there is a lack of information concerning the "highlights" of the Sanctuary resources. Although Cordell Bank is an area of exceptional ecological value it has only recently been "discovered" through the efforts of a few researchers whose investgations have assisted NOAA recognize Cordell Bank's national significance.

Unfortunately there is still very little known about the general oceanographic regime around Cordell Bank and less about the specific details of microhabitats and species diversity. A number of reports are available that describe seamounts and submerged coastal banks in general but no similar studies have been done on Cordell Bank specifically.

The research divers, mentioned above, have managed to do an excellent job in compiling the original baseline data. These data have enabled us to gain our first rudimentary understanding of the Bank's structure and function. They have compiled detailed lists of invertebrate and benthic organisms as well as completed surveys of local topography and geological diversity. In addition, NOAA has funded aerial and at-sea surveys of marine mammal abundance and distribution while the local NMFS and CDF&G laboratories have investigated the local fish population dynamics.

NOAA is aware of the gaps in our understanding of the ecology of Cordell Bank and intends on designing a research plan and monitoring program to further investigate the special resources within the Sanctuary.

7

2. Socioeconomic Impacts.

The draft EIS needs to address the possible socioeconomic impacts of the proposed action on various user groups including "excursion" services used for whale watching or nature viewing. If socioeconomic impacts due to the proposed action are negligible, it should be stated.

8

3. Environmental Conditions (page 17).

A complete description of environmental conditions should include specific and cited information regarding currents, water chemistry, upwelling, nutrient levels, productivity, chlorophyll measures, etc., if available.

4. Tables and Figures.

In general, the document would benefit from the inclusion of additional tables and/or figures that summarize or illustrate the following:

a. Partial List of Invertebrates and Algae;

b. Changes in Species Assemblages with Depth;

c. List for Newly Discovered, Rare, Endangered and Threatened Species;

d. Distributions of Marine Mammals and Seabirds;

e. *Commercial Fishing Activity at Cordell Bank (including map of* locations by gear type and species);

9

f. Summary Table of Proposed Action and Boundary, Management, and Regulatory Alternatives; and

10

g. Anticipated Timetables for Management Plan Reviews, Sanctuary Research Plans, etc.

11

5. Short-tailed albatross:

The short-tailed albatross is mentioned as endangered on page 6 and again on page 62; yet it is not considered in Part II, Section II.B.2(d), Seabirds. Since the species is listed as endangered, it is an important and significant component of the fauna at Cordell Bank and deserves discussion. Information regarding when the species was sighted and by whom should be provided.

12

6. References to "Plants."

Replace the word "plants" by the more appropriate and specific term "algae". (See page 19, last paragraph; page 21, line 6.)

7. This addition has been made to the FEIS/MP (Part IV, Section II). In fact it is possible that Sanctuary designation will stimulate the local economy in terms of increased visitation and public awareness. It is unlikely that the increased unsage will negatively impact the Bank's resources. NOAA will monitor these activities to determine any effects of increased usage.

8. This technical information has been incorporated when available.

9. The summary of proposed boundaries has been presented in Figures 5 and 6. Management and regulatory alternatives do not change between boundary alternatives therefore these statements have been left in the original text format.

10. See Generic Response G. Final and detailed timetables will be formulated using the local expertise, after the Sanctuary has been designated. Management Plan Reviews take between 3 to 5 years whereas Sanctuary Research Plans are prepared annually.

11. This information has been added to the FEIS/MP.

12. These corrections have been made in the FEIS/MP.

13

7. Abbreviations.

California Department of Fish and Game (CDF&G) is more widely abbreviated as CDF&G rather than as CF&G as used throughout the document.

13. It is NOAA's experience that California Fish and Game is more commonly referred to, and abbreviated as, CF&G.

14

It would be useful to include a table of acronyms in the document.

14. This table has been added to the FEIS/MP.

8. Citations.

There are numerous examples throughout the text where factual data have been presented but are uncited. To increase the scientific validity and defensibility of the draft EIS, statements of fact should be properly cited. Citations should be used particularly in support of statements made on the following pages:

15

Page 17. Geology (paragraphs 1 and 2);

Page 18. Metereology;

Page 18. Waves and Currents;

Page 22. Fin Fish (paragraph 1); and

Page 77. Oil Spill Impacts on Seabirds.

15. These citations have been added wherever possible in the FEIS/MP.

16

9. Maps.

All maps should have latitude/longitude lines.

16. All maps in the FEIS/MP have been corrected to include latitude/longtitude lines.

10. Metric/Standard Equivalents.

While adequate in most cases, it is appropriate that all standard measures be accompanied by their equivalents. See the following pages.

17

Page 19. (degrees F and degrees C): 65 feet (? m); 100 feet (? m);

Page 28. 300 foot (? m or ? fathoms);

Page 29. 300 foot (? m or ? fathoms); and

Page 51. 115 feet (? m)

17. These measurement conversions have been added to the FEIS/MP.

PAGE-BY-PAGE COMMENTS

18

Page iv, Part IV, Section 1.A.1. Retitle "Regulatory and Enforcement Regime" to read "Resource Protection Regime" to match the heading in the text (page 75).

18. This correction has been done in the FIES.

19

Page 4, bullet 2. Update the information on the Fagatele Sanctuary.

19. This addition has been made in the FEIS/MP.

20 Page 5, paragraph 3. "Assortment of benthic organisms is exceptional due to its combination of intertidal and subtidal species." The implication that "intertidal" species coexist with subtidal species is misleading in that the use of the word "intertidal" in this context may serve to imply that the Bank is periodically covered and uncovered by the tides. The draft EIS should be consistent in using the phrase "combination of nearshore (subtidal) and offshore (oceanic) species" (as on pages xi and 102).

20. The FEIS/MP has been modified to remove the inconsistency.

21 Page 5, paragraph 3. Avoid the use of undefined characterizations (eg., "extraordinarily lush and healthy") when discussing the biology of the Bank.

21. This has been corrected in the FEIS/MP.

22 Page 6, lines 6-7. Replace "on nine of sixteen" with "nine times over the course of sixteen". (See comment below regarding pages 26-32 for further clarification.)

22. This has been corrected in the FEIS/MP.

23 Page 6, paragraphs 2 and 3. While increased boat traffic and unrestricted diving are termed "less serious," they are in all probability "negligible" sources of impacts since the Bank is relatively inaccessible during most times of the year. Particularly in regards to the "diver" impacts, it appears that an underlying concern here is toward safeguarding Allopora. The concern for this rare coral is acknowledged, but suggest that this subject (i.e., Allopora protection) be dealt with specifically rather than blanketing this by vague regulation. Other than removal of Allopora, it is unlikely that there would be significant impacts from removal of benthic resources by sport divers.

23. NOAA is concerned with the protection of all resources. It is not NOAA's intent to only protect Allopora but all benthic resources. Clarification and exceptions to this regulation have been incorporated into the FEIS/MP (See Generic Responses D and I).

24 Page 12, paragraph 2. Add the word "wide" following the phrase "4.5 miles." It would also be appropriate to explain here why the alternative is preferred.

24. This has been corrected in the FEIS/MP.

25 Page 12, paragraph 3. "There is no offshore, . . . north of the Bank". This sentence in unsupported and unsubstantiated. There are several, if not many, rocky features north of the Bank. This statement could be written as, "To the north, there is no offshore, shallow-water area with physical features similar to the Bank."

25. This has been corrected in the FEIS/MP.

26 Page 15, Figure 3. This figure depicts the bathymetry of the Bank proper, but does not include the bathymetry of the preferred boundaries of the sanctuary. The reference to the figure in the text should be changed to reflect the actual boundaries of the figure, or vice versa; the bathymetry map should be expanded to include the boundaries of the sanctuary.

Also, provide a depth designation of the feature in the mid-left or western side of the figure.

26. This Figure has been deleted from the FEIS/MP.

27 Page 16, paragraph 3, "California Current flows southward along the coast bringing nutrients to the upper levels of the Bank, while the upwelling of nutrient-rich, deep-ocean waters stimulates the growth of planktonic organisms. High levels of productivity on the Bank are indeed due to upwelling phenomena and water clarity. However, it is not clear that the California Current is an additional source of nutrients. Typically, surface currents like the California Current are very low in nutrients. Do productivity data exist to support this statement? If not, it is sufficient to explain nutrient enrichment on the basis of upwelling alone, and it is not necessary to include the California Current as a nutrient source. Similar references to this were made on p. 18, last line; p. 19, para 2; and p. 20, line 1.

27. This has been corrected in the FEIS/MP.

28 | Page 17, line 1. "algaes" should read "algae".

29 | Page 17, Geology. Only the geology of the Bank proper is described (i.e., hard bottom features). Since the preferred boundary includes up to 3 nautical miles around these features, bottom features surrounding the bank should be included in the geologic description (i.e., description of soft bottom).

30 | Page 19. Line 2 should read: "the Coriolis effect, it is replaced by deep, nutrient-rich waters moving upward to the surface."

31 | Page 19. (a) Bottom Organisms. This is a rather confusing explanation of trophic relationships and their bases. The first line of this section would better read, "the highlight penetration and nutrient influx to Cordell Bank waters provides an environment suitable for rich growth of phytoplankton and macroalgae. These algae, in turn, support a variety of organisms on several trophic levels." While it is true that the "bulk of the biomass" will be red algae at any given time, if the system is dominated by filter feeders (as indicated on page 20), then the ecosystem is more likely to dependent upon energy contributions from abundant phytoplankton. There are indications that "plankton" studies must have occurred since the rare and unusual diatom "Entopyla" is mentioned in the Federal Register Notice of August 25, 1981. These types of data should be incorporated into the EIS.

32 | The section is extremely vague in regard to which species are found at Cordell Bank. For example, what are "other types" of algae, and what other inverts besides rare species inhabit the Bank? A table of representative algal, planktonic (where available), and invertebrate species should be provided.

33 | Insert the phrase "together with a diverse and heterogeneous substrate" between words "waters" and supports" on page 20, line 2.

34 | Summarize rare forms and species extensions by geographic range or depth in a table.

35 | An additional reason that Allopora may be found in large numbers is possibly because of low collection pressure.

36 | In the Federal Register Notice of August 25, 1981, three species were listed as new discoveries and another listed as rare or unusual. Three of these four species are not included in the draft EIS. Since these species likely represent "unusual" and significant aspects of the Cordell Bank resources, they should be included.

37 | Page 20, paragraph 3. "Ecotocarpales" should read "Ectocarpales." It should not be underlined or italicized as it refers to taxonomic order. Corallinaceae refers to a family and should not be underlined, either.

38 | Page 21, paragraph 1. By definition, if an organism also occurs subtidally, it could not be "strictly intertidal." An example of such an organism(s) would clarify what is meant.

28. This has been corrected in the FEIS/MP.

29. The description of the bottom features around Cordell Bank and within the Sanctuary has been added to the FEIS/MP. For further information see the Management Plan for the Point Reyes-Farallon Islands National Marine Sanctuary.

30. This has been corrected in the FEIS/MP.

31. Comment accepted. This has been corrected in the FEIS/MP.

32. A table of representative invertebrates, algae and plankton has been added to the FEIS/MP.

33. This has been corrected in the FEIS/MP.

34. Rare forms of species are included in the species lists in the tables in the text. Detailed descriptions by geographic range or depth distribution are unavailable at this time. Future research efforts will investigate these gaps in our knowledge of the species distributions.

35. This addition has been made in the FEIS/MP.

36. These species have been added to the FEIS/MP species lists.

37. These corrections have been made in the FEIS/MP.

38. This has been corrected in the FEIS/MP.

39 Pages 21 and 22. If biological zonation is such an important and significant feature of the Bank, then a figure illustrating the pattern would be appropriate. Portrayal of changes in assemblages by depth in a table or general outline would increase the clarity of the presentation and act as a "quick reference" for referrals within the text.

39. Rare forms of species are included in the species lists in the tables in the text. Detailed descriptions by geographic range or depth distribution are unavailable at this time. Future research efforts will investigate these gaps in our knowledge of the species distributions.

40 Page 22, paragraph 1. That "competition for space becomes the major population limiting factor" is a supposition and has not been experimentally determined.

40. This has been corrected in the FEIS/MP.

41 Page 22, paragraph 2, "The particular combination of . . . found in few, if any, other places". Eliminate the words "if any." An attempt should be made to correlate and compare Cordell Bank phenomena to studies of other banks. For example, comparison of the biological assemblages with Tanner and Cortes Banks would be pertinent since these banks are similar to Cordell Bank in their construction, surrounding oceanographic conditions, and occurrence of Alloporus populations.

41. This has been corrected in the FEIS/MP.

42 Page 22. (b). Change the heading "(b)" to either "Fish Resources" or "Fishes" since not all species listed in Table 1 are fin fishes and it would be unrealistic and inadequate to cover only that group of fishes.

42. This has been corrected in the FEIS/MP.

43 Page 22. (b) Fin Fish. Table 1 in reality lists 38 species of fish that have been identified by Schmieder, 1985, in waters of Cordell Bank proper and is not representative of all fishes to be found within the confines of the preferred boundary of the sanctuary (particularly demersal species living over sand). The CDF&G commercial catch records (for both trawl and nontrawl gear methods) would help identify which additional species are likely to occur.

Table 1. Consult additional and current sources to generate a more complete and up-to-date list of fishes within the preferred sanctuary boundaries. For example, 1977 CDF&G commercial catch data from fish blocks inclusive of the Bank indicate the presence of chinook and coho salmon; English, rex, and Dover soles; California halibut; thornyhead; splitnose rockfish; and Pacific ocean perch.

Table 1. "Vermillion" rockfish should read "Vermilion" rockfish.

Table 1: It is surprising to find that "kelp bass" are not included in the table as they are indicated as present in both Federal Register Notices and several popular articles written by Schmieder.

43. These corrections and additions to Table 1 have been made where the information is available.

44 Avoid nonscientific descriptions whenever possible in discussing the biology of the Bank; for example, "blue rockfish and several red varieties are especially colorful as they swim around the ridges and slopes." What should be emphasized is that the unusual topography of the bank provides for a variety of habitats which may account for the tremendous diversity of fishes, in general, and rockfishes specifically.

44. The language of the DEIS/MP is not only meant for strict scientific interpretation. In addition the descriptions of the rockfish emphasizes the contrasting variety of fish species and the unusual clarity of the water at the associated depths.

45 It would be appropriate to defer specific discussion of sportfishing data to the human activities section later in the draft EIS.

45. This has been corrected in the FEIS/MP.

46 It is not appropriate to assume that the number and types of fishes caught by sportfishermen necessarily reflect of the relative abundance of all fishes inhabiting the Bank. The types and numbers of fishes caught and reported by sportfishermen are functions of gear used, desirability of the species, and size and ease of capture. For example, small but abundant benthic fishes will be underestimated.

47 The source(s) of factual data regarding age/size/life history of fishes discussed in this section need to be cited.

48 Table 2. The average annual catch data for each month for major species should be presented rather than the sum over an arbitrary unit of time (11 years). Also, a discussion of any trends apparent from this data in the text (i.e. is there a pattern through time?) should be presented. Tables should be checked for accuracy. For example, in Table 2, the sums of numbers in columns 6, 7, 8, 9, and 10 should equal number presented in column 2 but do not. Finally, more recent data (post 1981) should be available and incorporated into the table.

49 Pages 26-32. Marine Mammals and Seabirds. The text indicates that 14 species of mammals have been sighted, while Table 3 indicates only 13. Table 3 may be better entitled "Marine Mammals Observed on Cordell Bank During the Webber and Cooper Study 1981 and 1982."

50 The text indicates that 373 sightings were made during 16 total cruises. This is not consistent with data presented in Table 3 in which the total number of sightings adds up to 267.

51 The number of sightings should not be confused with frequency of occurrence. For example, 9 sightings out of 16 cruises is not the same as a species being seen on 9 separate cruises out of 16 total cruises, since all 9 sightings may have been made on a single cruise. It would be informative to include a frequency of occurrence value in Table 3 with the latter type of data, i.e., on how many of the cruises were particular species actually observed.

52 Table 3. Clearly indicate in the table the dates of the survey and the level of effort.

53 The "areal" distribution of seabirds and marine mammal feeding grounds should be put into a figure. This is especially important in as much as it represents the only rationale provided for the 3 nautical mile preferred boundary.

54 Page 28, paragraph 1, "Pacific white-sided dolphins . . . were sighted just to the northwest". "just" should be replaced by an approximate unit measure of distance.

55 Page 29, last line. The final sentence on this page is incomplete.

56 Page 30, paragraph 3. "juvenille" should read "juvenile".

46. This has been corrected in the FEIS/MP.

47. These citations have been added wherever necessary.

48. The corrections have been made in the FEIS/MP. It is not our intent to give detailed fishery statistics but to highlight the overall patterns of human use in the Sanctuary area.

49. As the text explains the gray whale is known to pass through the area but was not observed on Cordell Bank by Webber and Cooper and therefore not added to data in Table 3.

50. This has been corrected in the FEIS/MP.

51. The text clearly explains that the number of sightings is different from the frequency of occurrence. It is only our intent to give the reviewer a description of the species types and abundance in the Sanctuary.

52. This information is available in the text.

53. See Generic Response A. It was our intention in the DEIS/MP to outline the value of all living resources in the vicinity of Cordell Bank. The species and patterns of fish, benthic organisms and sea birds, (as well as whales), were described so that a reviewer of the DEIS/MP would gain a perspective of the biological diversity and abundance of all natural resources on the bank.

    Marine mammals are a significant resource and NOAA recognizes the importance of detailed investigations into their abundance, distribution and behavior. Cordell Bank is especially important in this regard as a habitat for marine mammals. NOAA is aware of the numerous sightings of marine mammals in this area and how their abundance changes both annually and seasonally. However, many questions remain regarding individual behavior patterns and fine scale distribution patterns around Cordell Bank. NOAA, through the Point Reyes-Farallon Islands National Marine Sanctuary, has supported research over the past three years to investigate the distribution and abundance of humpback and blue whales as well as opportunistic sightings of other marine mammals. Aerial and vessel-based survey methods were able to identify individual humpback whales. This research has provided a thorough baseline characterization and suggests that a local, "resident" population of 88 humpback whales exists in the Point Reyes-Farallones National Marine Sanctuary and adjacent region.

54. This has been corrected in the FEIS/MP.

55. This has been corrected in the FEIS/MP.

56. This has been corrected in the FEIS/MP.

57 Page 32. Human Activities Section. Treatment of commercial fishing activities in the Cordell Bank vicinity is inadequate. *While commercial fishing was described as* "significant" (page xi), "important" (page 51), and the dominant human activity at *the Bank (page 6, 32), no data were provided to support these assertions.* It is unnecessary to assume that "commercial catch is similarly dominated by rockfish" (page 33) when data are available to support this statement and to clarify what other species may be important to the industry. Consult CDF&G records and maps for types of fishing activities, species captured, and gear used by commercial fishermen working the area. This information could then be utilized in the analysis if impacts particularly as they relate to proposed regulations. Also, careful consideration should be given to effects of various gear types on fish resources. While prohibition of gill netting has helped to preserve rockfish stocks, trawling for the same group may come into conflict with the proposed prohibition against deliberate damage or removal of benthic resources (see comments above).

58 Descriptions of commercially and recreationally important species consider only *those species within the Bank proper. Once again, activities (especially commercial* fisheries) related to species within the entire preferred boundary of the proposed sanctuary should be described.

59 The human activities section should also include a description of existing facilities that provide "excursion" services for the purpose of "whale watching" or nature viewing. The number of operators involved, their ports of origin, and average number of trips per year should be cited. These data could then be used in the analysis of possible economic impacts related to the actions.

60 Page 33, paragraph 2. Change "February 1981" to "April 1981" and change "revised proposed" notice to "final" notice.

61 Page 34, 3. Commercial Shipping, last sentence. *Should state how far away the* VTSS is from Cordell Bank at this point.

62 Page 37, line 8. It is unclear how data taken during a hydrographic cruise produced detailed plots of "biological communities." If these detailed plots exist, they should be incorporated into the EIS.

63 Page 41, paragraph 1. A complete and concise summary of the Designation Document should be provided as part of the paragraph so that the reader can determine if it is necessary to turn to the Appendix to study the document in detail.

64 Page 41. (a) Vessel Discharges, first sentence. This statement could be made stronger by simply prohibiting discharges from entering the sanctuary. As presently written, it is unclear who has the burden of proof *of determining if sanctuary* resources are injured.

65 Page 42. (c). We recommend that the phrase "no activity" be clarified (See also page 73). It is neither necessary nor practical to exclude seismic survey activities from the 50 fm isobath area.

57. The corrections have been made in the FEIS/MP. It is not our intent to give detailed fishery statistics but to highlight the overall patterns of human use in the Sanctuary area. Also see Generic Response H.

NOAA agrees that there is a lack of information concerning the "highlights" of the Sanctuary resources. Although Cordell Bank is an area of exceptional ecological value it has only recently been "discovered" through the efforts of a few researchers whose investgations have assisted NOAA recognize Cordell Bank's national significance.

Unfortunately there is still very little known about the general oceanographic regime around Cordell Bank and less about the specific details of microhabitats and species diversity. A number of reports are available that describe seamounts and submerged coastal banks in general but no similar studies have been done on Cordell Bank specifically.

The research divers, mentioned above, have managed to do an excellent job in compiling the original baseline data. These data have enabled us to gain our first rudimentary understanding of the Bank's structure and function. They have compiled detailed lists of invertebrate and benthic organisms as well as completed surveys of local topography and geological diversity. In addition, NOAA has funded aerial and at-sea surveys of marine mammal abundance and distribution while the local NMFS and CDF&G laboratories have investigated the local fish population dynamics.

NOAA is aware of the gaps in our understanding of the ecology of Cordell Bank and intends on designing a research plan and monitoring program to further investigate the special resources within the Sanctuary.

58. See response above.

59. This information has been added wherever possible.

60. This has been corrected in the FEIS/MP.

61. The VTSS is outside of the Sanctuary boundaries. Figure 4 clearly illustrates the location of the VTSS and its distance from Cordell Bank.

62. The descriptions of species identified on these cruises have been added into the species lists in the FEIS/MP.

63. The DEIS/MP adequately summarizes the intent of the designation document throughout the text. A detailed summary is unnecessary. The reviewer of the DEIS/MP who needs further detail of the designation document is encouraged to consult the text found in Appendix 1.

64. This has been corrected in the FEIS/MP.

65. This has been clarified in the FEIS/MP. The reference to a "no activity" zone has been removed. Also, see Generic Response B.

66 Page 42, last line. "severe impacts" if they did occur, would probably be specifically limited to marine mammals and birds rather than to general "resources" as written.

67 Page 42, last line. Unless the phrase "and present severe health and safety hazards" is qualified it should be deleted.

68 Page 43, line 2. Replace "material endangering the public health" with "public-health endangering material".

69 Page 44, 5. Resource Protection. Existing enforcement capabilities should be detailed in this section (i.e., number of enforcement boats available in the area, frequency with which boats are detailed to this general area, manpower availability, etc.).

70 Page 46, 2. Framework for Research, bullet 2. Concerning baseline studies, "interaction of the living resources" is a separate and complex category of studies and is better placed within "predictive studies".

71 Page 46, 2. Framework for Research, bullet 3. Add "manipulative" to the predictive studies category. Also, in the discussion of baseline studies, relationships between the biota and physical/chemical factors and human activity on fishes are mentioned. Clarify whether there are plans to study interspecific relationships among the marine oganisms.

72 Page 47, (b). "what is happening" is not clear, replace with "changes in the long term".

73 "This program should include . . . and studies to monitor the dynamics of species competition for space." Studies of species' competitive interactions would be a predictive type study that would involve manipulation of species. It is inappropriately placed within monitoring. The sentence would better read, "This program should include . . . and studies to monitor the population dynamics of species inhabiting upper reaches . . ."

Page 48, 3. Selection and Management of Research Projects. A timetable summarizing these events would improve tracking them through time.

The decision to establish Cordell Bank as an NMS provides a rare and unique opportunity for funding of research studies that will be of interest to several agencies. As written, the plan indicates that the majority of decision and development of a studies program are left to the discretion and initiative of the Sanctuary Manager. We recommend that:

74 a. A working group or joint committee similar to that utilized by the Minerals Management Service (MMS) Environmental Studies be formally established. A working committee including representatives from National Oceanic and Atmospheric Administration, U.S. Fish and Wildlife Service, MMS, Army Corps of Engineers, Environmental Protection Agency, National Park Service, and CDF&G would provide for input from more groups, all of which serve to benefit from funded research.

66. NOAA agrees partially with this comment, and therefore has defined the scope of potential regulation of hydrocarbon activities to include the whole Sanctuary. However the potential impacts of spillls and regular discharges associated with such operations, on the Bank itself, cannot be minimzed.

A major EPA study (EPA 440/4-85/002, August 1985) described how different topographies and current regimes could dominate the physical range and dynamics of drilling mud transport. The report also outlined the components of the drilling discharges but did not outline with any certainty the effects on the flora and fauna that exist in the proposed Cordell Bank area. Overall, and without further information, NOAA is unable to predict the effects of oil and gas activities on the resources of Cordell Bank. NOAA has included within the scope of regulations, possible regulation of oil and gas activities, throughout the Sanctuary, to prevent immediate, serious and irreversible damage to the ecosystem of the area.

The DEIS/MP has extensively illustrated the variety and richness of fish, algal, planktonic, invertebrate and larval resources that are present on Cordell Bank and are potentially threatened by hydrocarbon activities.

67. Health and safety hazards refers to the commonly accepted threat of bioaccumulation of toxins through the food-chain to humans and also perhaps to any direct effects to humans such as fishermen and swimmers.

68. Comment accepted. The text has been clarified in the FEIS/MP.

69. See Generic Response G.

70. Comment accepted.

71. Ideally manipulative studies will be done but not in the near future. It is first necessary to conduct more basic descriptive research and monitoring in the Sanctuary.

72. This has been corrected in the FEIS/MP.

73. This has been corrected in the FEIS/MP.

74. Comment accepted. NOAA fully intends to involve all local expertize in the development of a Sanctuary research program. NOAA has always encouraged the input of the private and public scientifc community in achieving its research goals.

77 b. The Sanctuary Research Plan (SRP) should address "national marine research goals."

78 c. Research on the banks should not be limited to sanctuary-sponsored projects to the extent that outside projects do not affect other ongoing research efforts. The "working group" approach suggested above would be a valuable aid in making decisions regarding concurrent research projects conducted by outside groups. While this aspect of the SRP was alluded to on page 50 (4.), the question of how outside research requests will be approved or denied was not addressed. The mechanics of how data generated by these projects will be disseminated or made public should be clarified. In this respect, an automated data management plan should be incorporated into this document so that electronic transfer, particularly among agencies, will be facilitated. It will also be important to address how research data and reports would be made available to the public.

79 Page 63. The Office of Strategic and International Minerals of MMS also has responsibility for minerals on the Outer Continental Shelf (OCS).

80 Page 63, last line. Replace "will" with "would". "Will" implies that the draft EIS/Management Plan has already been accepted.

81 Page 65, 2. Boundary Alternative 2. It is unclear from Figures 2 and 6 whether the preferred boundary of the Cordell Bank NMS would be tangent to or touch the Point Reyes-Farallon Islands NMS on its southeastern edge. If not, consideration might be given to doing so, such that the sanctuary boundary is contiguous with the Point Reyes-Farallon Islands NMS in at least one place.

82 Page 71, last paragraph. Since an estimate of the cost required to manage the Cordell Bank NMS is included in Management Alternative 1 (page 70), a cost estimate should be included for Management Alternative 2, as well.

83 Page 72, Removing or Damaging Resources, (a) No regulation. Since Allopora appear to be the primary benthic species the sanctuary is designed to protect, a discussion of present management and/or laws protecting Allopora, their current effectiveness, and how the sanctuary will improve this protection should be included.

84 Page 73. Replace "Hydrocarbon Development Activities" with the heading "Hydrocarbon Exploration and Development Activities".

85 Page 73, paragraph 3. Replace "will" with "would".

86 Page 74, line 9. Replace "Manager (RM)" with "Director (RD)"; and replace "Office" with "Region".

87 Page 74, line 13. Replace "RM" with "RD"; and "surface disposal" by "discharge".

88 Page 74, line 14. Replace "fluids" with "materials".

89 Page 74, line 19. Replace "RM" with "RD".

75. NOAA agrees. The Plan will address "national research goals".

76. Comment accepted. NOAA encourages the accurate and timely dissemination of all research findings to the public as part of its educational goals.

77. Comment accepted.

78. This has been corrected in the FEIS/MP.

79. Comment accepted. The proposed Sanctuary boundary is contiguous to the Point Reyes-Farallon National Marine Sanctuary. Also, see Generic Response A.

80. Comment accepted. See Generic Response G.

81. NOAA intends to protect all benthic, invertebrate and algal resources. Current CF&G and NMFS regulations will be enforced by management staff and include the prohibition of the removal or damage of benthic invertebrates and algae within the 50 fathom isobath around Cordell Bank.

82. This has been corrected in the FEIS/MP.

83. This has been corrected in the FEIS/MP.

84. This has been corrected in the FEIS/MP.

85. This has been corrected in the FEIS/MP.

86. This has been corrected in the FEIS/MP.

87. This has been corrected in the FEIS/MP.

90 | Page 74, line 20. Replace "disposition" with "onshore disposal".

91 | Page 74, line 21. Delete the phrase "by barging,".

92 | Page 76, line 12. Replace "generally" with "strictly".

93 | Page 76, line 19. Delete the phrase "of oil spills".

94 | Pages 76-85. Impacts of regulatory alternatives should be discussed and analyzed separately (possibly as Part IV, Section I.A.5.) from the discussion of impacts due to resource protection (Part IV, Section I.A.1.).

95 | Page 79, paragraph 2. Is there evidence that bioaccumulation actually occurs in cetaceans as is suggested in this paragraph? There is evidence that certain animal groups (fishes and crustacea) do not accumulate petroleum hydrocarbons, for example, as reported by Anderson et al., 1973. In: Symposium on Effects of Pollutants on the Physiological Ecology of Estuarine Organisms, Univ. South Carolina. November, 1973.

96 | Page 80, line 17. Delete the phrase "interference with thermo-regulation" since fishes and benthic organisms are not capable of thermo-regulation.

97 | Page 85, line 5. The phrase "could be regulated by the sanctuary program" is inconsistent with earlier statements in the draft EIS. Clearly, activities "would" (not could) be regulated within the 50 fm isobath if the sanctuary were established.

98 | Page 85, 2. Research and Interpretation. Increasing public awareness of the Bank, may bring about unforeseen impacts to the Bank and its resources, as more vessels may be attracted to the area. This possibility (mentioned on pages 6 and 48) should be specifically addressed and possible impacts (disturbance to feeding marine mammals and seabirds; damage to Allopora due to increases in anchoring pressure) discussed.

99 | Pages 89 and 90. No analysis has been provided for socioeconomic impact to user groups, excursion boat operators, etc. If socioeconomic impacts due to the proposed action are negligible, it should be stated.

100 | Page 99. There are two "Schmieder, R. W., 1984" references on this page.

101 | Page 102, paragraph 1. Replace "algaes" with "algae" and "fish" with "fishes".

102 | Page 103, Article 5. The phrase "Article 4, Section 1, paragraph (b)" should read "Article 4, Section 1, paragraph (a)".

103 | Page 119, line 10. Replace "prohibits" with "prohibits".

104 | Page 120, line 4. Replace "shore such" with "shore. Such".

105 | Page 121, line 7. Replace "polution" with "pollution".

106 | Page 121, line 22. Replace "takers" with "tankers".

88. Comment accepted.

89. Comment accepted.

90. Comment accepted.

91. This has been corrected in the FEIS/MP.

92. Comment accepted. NOAA prefers to keep the discussion of all impacts on the community under one heading.

93. Comment accepted. The text discusses the uncertainty in the evidence.

94. Comment accepted. The sentence discusses the sublethal effects of hydrocarbons on marine organisms in general. Disturbance of thermo-regulation is intended to refer to marine mammals and birds. In fact, there is evidence that suggests that certain species of tuna fish and sharks can also thermoregulate (Carey, F.G. and Teal, J.M. 1968. "Mako and Porbeagle: Warm-Bodied Sharks." Comp. Biochem. Physiol., Vol. 24).

95. The DEIS/MP does not state that a prohibition on hydrocarbon activities would be regulated if exploration and development were proposed within the 50-fathom isobath. The FEIS/MP has been modified to state that if such a regulation were proposed, it would apply throughout the Sanctuary, and not just within the 50-fathom isobath.

96. NOAA agrees that the specific effects of the Sanctuary designation are difficult to predict. NOAA encourages increased use of the area by all interested parties. NOAA plans on conducting monitoring activities to determine the effects on the area's resources. Additional action will be considered as necessary. Also, see Generic responses D and I.

97. Socioeconomic impacts are considered to be negligable. This has been corrected in the FEIS/MP.

98. This has been corrected in the FEIS/MP.

99. This has been corrected in the FEIS/MP.

100. This has been corrected in the FEIS/MP.

101. This has been corrected in the FEIS/MP.

102. This has been corrected in the FEIS/MP.

103. This has been corrected in the FEIS/MP.

104. This has been corrected in the FEIS/MP.

107 Page 121, line 25. Replace "en route" with "enroute".

108 Page 122, line 2. Insert "and 1985" after "1978,".

109 Page 122, line 11. Replace "Secretarial Order No. 2974 of August 1978" with "655.DM1."

110 Page 122, line 18. Replace "exporatory" with "exploration and development."

111 Page 122, line 21. Insert "and 256" after "Part 250".

112 Page 122, line 22. Insert ", and OCS orders." after "particular leases" at the end of the sentence.

113 Page 122, line 26. Replace "marerials" with "materials."

105. en route is an accepted spelling for this term originating from the French.

106. This has been corrected in the FEIS/MP.

107. Comment accepted. For the purpose of clarity the original terminology is also maintained.

108. This has been corrected in the FEIS/MP.

109. This has been corrected in the FEIS/MP.

110. This has been corrected in the FEIS/MP.

111. This has been corrected in the FEIS/MP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

29 OCT 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled CORDELL BANK NATIONAL MARINE SANCTUARY. Our detailed comments on this document are enclosed.

Under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, EPA is required to review and comment on this DEIS. We have classified this document as Category LO - Lack of Objections (see attached "Summary of Rating Definitions and Follow-Up Actions"). We support creating a marine sanctuary to protect Cordell Bank. However, we believe that the FEIS should analyze other regulatory alternatives.

We appreciate the opportunity to review this DEIS. Please send four copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please call me at (415) 974-8083 (FTS 454-8083) or have your staff contact Harriet Hill at (415) 974-8193 (FTS 454-8193).

Sincerely yours,

Deanna M. Wieman, Director
Office of External Affairs

Enclosure (four pages)

cc: Department of Commerce, Wilczynski
National Marine Fisheries Service, Kiraly

Comments

We recommend that the FEIS analyze a broader range of alternatives regulating hydrocarbon development activities within the sanctuary. No regulatory alternative (RA) excluding oil and gas activities from the entire sanctuary is considered in the DEIS. Such an alternative seems "reasonable" since similar regulations are in place for the adjacent Point Reyes-Farallon Islands National Marine Sanctuary [15 CFR 935] and the Channel Islands National Marine Sanctuary [15 CFR 936].

The DEIS discusses two RA's; "no immediate regulation" and "immediate regulation of development activities." The former is proposed as the preferred alternative because the present OCS Leasing Program excludes the area of Cordell Bank within the 50-fathom contour. The latter RA would prohibit oil and gas activities within the 50-fathom contour, and monitor hydrocarbon activities within one mile of the contour.

Both of the R.A.'s would permit oil and gas activities well within the limits of the preferred boundary alternative, which includes a buffer zone of three nautical miles beyond the 50-fathom contour. Therefore, excluding hydrocarbon activities from sanctuary boundaries would not duplicate current OCS Leasing Program regulations.

To expand the alternatives analysis, we recommend that the FEIS:

a. Examine a third RA which completely excludes oil and gas activities from the sanctuary. The impacts of this RA should be delineated for each of the three boundary alternatives.

    1) The environmental consequences of the three RA's should be contrasted to sharply define the issues and provide a clear basis for choosing among the options [40 CFR 1502.14]. The DEIS does not compare the impacts of the two proposed RA's.

b. Describe the regulatory process that would serve to exclude future oil and gas development under the preferred RA. The FEIS should provide an implementation plan for prohibiting future OCS leasing within the 50-fathom isobath.

c. Disclose the distance between the 30- and 50-fathom contours, and discuss in greater detail potential impacts from authorized oil and gas development within sanctuary boundaries.

1. Comment accepted. NOAA concurs that such a regulatory alternative is reasonable and has modified the FEIS/MP accordingly. Also, see Generic responses B and E.

2

In the DEIS, it is concluded that drilling discharges beyond the 50-fathom contour would not harm biotic resources, since most of the benthic biomass is found at depths of less than 30 fathoms (p. 82). But the distance between the two contours is not given. A major EPA study (EPA 440/4-85/002, August 1985) was conducted to determine the effects of drilling mud discharges. The study showed that significant benthic impacts from platform discharges can be detected as much as two miles from drilling sites.

We are concerned that discharges at the 50-fathom contour could seriously affect the benthic communities proposed for protection within the sanctuary. Without further information, we cannot determine if a "no activity" zone at the 50-fathom contour would adequately buffer Cordell Bank biota from adverse effects.

3

2. The FEIS should explain why the Cordell Bank sanctuary should be managed differently for oil and gas activities than the two other National Marine Sanctuaries in California, the Point Reyes-Farallon Islands, and Channel Islands Sanctuaries. Regulations issued for these sanctuaries specifically exclude oil and gas development within their boundaries, except for existing leases in the Channel Islands Sanctuary.

4

3. The FEIS should explain how the present delineation of the preferred boundary alternative (no. 2) is consistent with boundary determinations for the other California National Marine Sanctuaries. The DEIS states (p. 86) that the great areas incorporated by boundary alternative 1, the largest alternative, "are undifferentiated in terms of living resources from most of the ocean waters beyond." Do the considerably larger Point Reyes-Farallon Islands and Channel Islands Sanctuaries contain only the "well-defined environments" (p. 86) needed to support their ecosystems?

5

4. The FEIS should describe how the preferred boundary alternative would affect joint management with the Point Reyes-Farallon Islands Sanctuary.

Under the larger boundary alternative (1), it appears that:

a. Protected resources could be more easily managed in the local area. Cordell Bank could be managed as a unit with the contiguous Point Reyes-Farallon Islands Sanctuary. Fewer sanctuary boundaries would also aid enforcement efforts.

2. The distance between the 30 and 50-fathom isobath is on average 17 nautical miles with a range between 2 and 30nm. The cited EPA study described how different topographies and current regimes could dominate the physical range and dynamics of drilling mud transport. The report also outlined the components of the drilling discharges but did not outline with any certainty the effects on the flora and fauna that exist in the proposed Cordell Bank area. Overall, and without further information, NOAA is unable to predict the effects of oil and gas activities on the resources of Cordell Bank. NOAA has included within the scope of regulations, possible regulation of oil and gas activities, throughout the Sanctuary to prevent immediate, serious and irreversible damage to the ecosystem of the area.

3. The other National Marine Sanctuaries mentioned had plans for immediate oil and gas development. It was NOAA's intention to protect the resources from this imminent threat. In addition both Sanctuaries have Islands and coastline within their boundaries which are much more vulnerable to the long-lasting effects of an oil-spill which may impact beaches rookeries and haul-out areas. These additional risks are not present for the resources of Cordell Bank.

4. All of NOAA's National Marine Sanctuaries have boundaries that attempt to meet two objectives simultaneously. First, the Sanctuary is designed to encompass as much of the resource area as possible for increased protection. Second, the goal of effective management and resource protection is constrained by the size of the Sanctuary due to the limited number of available resources and Sanctuary staff to effectively manage the area and enforce the regulations. The proposed boundary for the Cordell Bank National Marine Sanctuary was based on analysis of the resources of the area, the different human uses, existing regulatory programs and the available NOAA resources to provide an effective management regime. In general the boundary represents a management unit which closely approximates an area needed to protect the special resources of Cordell Bank. Also, see Generic Response A.

5. NOAA agrees with both these comments. NOAA has chosen the larger boundary alternative (1) as the preferred boundary in the FEIS/MP.

b. Significantly more habitat for marine mammals would be protected. Although these animals are protected under the Marine Mammal Protection Act, their habitat is not.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 6, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

In response to the letter dated August 20, 1987 from Mr. Edward Wilczynski to the Nuclear Regulatory Commission, we have reviewed the Draft Environmental Impact Statement (EIS)/Management Plan prepared by the U. S. Department of Commerce for the Cordell Bank National Marine Sanctuary. Our review was directed to whether the action described in the draft EIS involved matters within our jurisdiction by law or special expertise or had any potential impact on NRC licensed facilities. No potential effects were identified; therefore, we have no specific comments on the draft EIS.

Thank you for the opportunity to review the draft document.

Sincerely,

James L. Blaha, Chief, PMSB
Office of Nuclear Reactor Regulation

cc: Edward Wilczynski

1. No Response Necessary.

U.S. Department of Transportation
United States Coast Guard

Commandant
United States Coast Guard

Washington, D.C. 20593-0001
Staff Symbol: G-MPS-1
Phone: (202) 267-0495

16004

OCT 22 1987

Ms. Vickie Allin
Acting Chief, Marine & Estuarine
Management Division
Office of Ocean & Coastal
Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Dear Ms. Allin:

The Coast Guard has reviewed the Cordell Bank Marine Sanctuary Proposed Management Plan and offers the following comments.

1

Laws and regulations pertaining to the proposed Cordell Bank National Marine Sanctuary (CBNMS) rely primarily on "at sea" enforcement. The management plan fails to make clear the anticipated level of Coast Guard efforts to support the "at sea" enforcement. The Coast Guard routinely patrols the coastal waters of Northern California with surface units and aircraft from San Francisco and other areas. However, resources dedicated strictly to enforcement of CBNMS regulations would not be available without relief from Congress. This is especially true where, in the management plan, NOAA proposes regulatory alternatives that will generate additional CBNMS regulations, thus increasing the Coast Guard's enforcement responsibilities.

In particular, page 45 states:

> Sanctuary designation would have the effect of broadening USCG enforcement responsibilities to include the enforcement of sanctuary regulations. However, in the event that analyses of use patterns after sanctuary designation indicate that additional surveillance is required, NOAA will provide for more intensive enforcement to protect sanctuary resources.

The management plan fails to clarify how NOAA will provide for more intensive enforcement. The Coast Guard cannot afford to provide resources that are solely dedicated to the enforcement of the CBNMS management plan and its regulations. The successful management of the Cordell Bank National Marine Sanctuary depends on NOAA's ability to effectively plan, giving due consideration to the limited resources of the Coast Guard.

2

In addition, the following changes should be made to the management plan as indicated:

> Page 43, 1st paragraph, change to read: Under the National Contingency Plan for the removal of oil and hazardous substances, actions to control or remove such material endangering the public health and the environment is the responsibility of the On-Scene

1. See Generic Response G. NOAA is fully aware of the constraints on the USCG at present and does not intend to add any further demands for increased enforcement. NOAA intends to inform the USCG of the boundaries of the Sanctuary and of any new regulations that exist inside the Sanctuary. NOAA only intends to make use of the current level of routine patrols from surface units and aircraft. Sanctuary staff will work in conjunction with the USCG and use any information that these patrols provide regarding violation of regulations within the Sanctuary.

2. This paragraph has been added to the FEIS/MP.

Coordinator, with assistance provided by the Regional Response Team. The U.S. Coast Guard Marine Safety Office in San Francisco will provide the on-scene coordination for response to oil or hazardous substances spills in the area of Cordell Bank. The Eleventh Coast Guard District in Los Angeles/Long Beach will provide Regional Response Center facilities. The On-Scene Coordinator will receive scientific support from NOAA and assistance as necessary from the Regional Response Team and other appropriate Federal and state agencies.

3 Page 55, Section 3., U.S. Coast Guard, 1st sentence: delete the words "all" and "Navigable."

3. This has been corrected in the FEIS/MP.

4 Page 62, 4th paragraph, 2nd line: After "Clean Water Act (CWA)", add: "and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)."

4. This has been corrected in the FEIS/MP.

5 Page 72, Section C.1.(a), 1st sentence, change to read: "Under this alternative, the provisions of the Clean Water Act (CWA), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Contingency Plan would provide some protection from potentially harmful discharges. Discharges of non-biodegradable solid waste is regulated under provisions of the Marine Protection, Research, and Sanctuaries Act (MPRSA). Discharges of oil and chemical waste are regulated under provisions of the Act to Prevent Pollution from Ships (APPS)."

5. The text has been modified in the FEIS/MP.

6 Page 88, 2nd paragraph, add 3rd sentence to read: "The Senate is considering ratification of Annex V of MARPOL 73/78 which when implemented by U.S. law would prohibit the discharge of all plastics into the marine environment."

6. The text has been updated in the FEIS/MP.

7 Pages 119 and 121: The International Convention for the Prevention of Pollution of the Sea by Oil, 1954, and The Oil Pollution Act of 1961 have been superseded by the International Convention for the Prevention of Pollution from Ships 1973, as modified by the 1978 Protocol relating thereto (MARPOL 73/78) and implemented by the Act to Prevent Pollution from Ships (33 USC 1901).

7. The text has been updated in the FEIS/MP.

The Coast Guard appreciates the opportunity to comment on this document.

Sincerely,

T/H ROBINSON
Captain, U.S. Coast Guard
Chief, Port Safety and Security Division
By direction of the Commandant

Copy: Mr. Edward Wilczynski, Acting Chief,
Ecology and Conservation Division,
NOAA

US Department
of Transportation
Maritime
Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

September 3, 1987

Ms. Vickie Allin
Acting Chief
Marine and Estuerine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service
National Oceanic and Atmospheric Administration
1825 Connecticut Avenue. N.W.
Washington, D.C. 20235

Dear Ms. Allin:

Regarding review comments on the Cordell Bank National Marine Sanctuary, Draft Environmental Impact Statement/Management Plan, I have reviewed the document and have the following comments, corrections and suggestions.

COMMENTS:

Overall the concept of a Marine Sanctuary is appropriate for the Cordell Bank area and the study of options and suggested areas seem to be very well planned.

1 | There seems to be a lot of consideration given to possible oil production and oil spills in the area and their implications.

CORRECTIONS:

2 | Pg ii — *Page numbers need to be corrected for items* Sec. II, C.3 and Sec. III B.5.

3 | Pg iii — Under Sec. IV D. the 2. Sanctuary Manager ... 57 was left out of the listing and National Park Service ... 58 should be 3. not 2.

4 | Pg iv — Sec.I A.1. Regulatory Protection Regime rather than Regulatory Enforcement Regime.

5 | Pg v — Part VIII the title of Appendix 1 does not agree between the Table of Contents and the Appendix and there was no list of abbreviations in Appendix 3 on page 125.

6 | Pg viii — I think the "Affected Environment" should have referenced Part III, Section II not Part II, Section II and the pages would be 64 not 63. Also page numbers for Parts IV, Section I, II and III need to be corrected.

1. No Response Necessary.
2. This has been corrected in the FEIS/MP.
3. This has been corrected in the FEIS/MP.
4. This has been corrected in the FEIS/MP.
5. This has been corrected in the FEIS/MP.
6. This has been corrected in the FEIS/MP.

7 | Pg ix — Page numbers need to be corrected.

8 | Pg xi — Last paragraph, first sentence use Arabic number 2 for appendix.

9 | Pg 12 — Under A.1. sixth line in the paragraph which starts "Cordell Bank is located" should have said " ... 9.5 miles long and 4.5 miles wide ..."

10 | Pg 33 — Under 2. last sentence of first paragraph delete "were" after tracts.

11 | Pg 41 — Under 2. second line of first sentence insert "(Section 1)" and delete "the".

12 | Pg 55 — Second line replace "he" with "the manager".

13 | Pg 105 — Appendix I, there should be some title or division indicating the start of "proposed regulations".

14 | Pg 124 — Appendix 3 is missing.

SUGGESTIONS:

15 | It is suggested that the Management Plan be clearly separated from the Environmental Impact Statement even to the extent that it could be a separate document or printed on another color of paper in the single document.

16 | There should be more information addressing the implications of the Marine Sanctuary Status on commercial fishing and if this will allow an inbalance in the species if fishing is stopped, continues or increases. You do not have to give the answers; but, should discuss the possible options.

17 | There should be some more information on the effects related to merchant shipping in terms of how the Marine Sanctuary Status would impact shipping activities in the area, if indeed there is any impact.

18 | Overall your document appears to represent a lot of consideration of the Cordell Bank resources from a scientific view; however, a little more effort on commercial utilization by fishing fleets and impacts on shipping activities would be useful.

7. This has been corrected in the FEIS/MP.

8. This has been corrected in the FEIS/MP.

9. This has been corrected in the FEIS/MP.

10. This has been corrected in the FEIS/MP.

11. This has been corrected in the FEIS/MP.

12. This has been corrected in the FEIS/MP.

13. This has been corrected in the FEIS/MP.

14. This has been corrected in the FEIS/MP.

15. NOAA originally considered the idea of separating the documents but found that there was too much repetition of material and a disorganized flow of information. The FEIS/MP has the same organization as the DEIS/MP to facilitate comparison and review. Different colored pages would not help with clarity as the Parts for the NEPA requirement and the Management Plan are combined and are not separate sections.

16. See Generic Response I.

17. See Generic Response H.

18. Due to the small area involved and the lack of regulations on shipping and fishing, NOAA does not believe that there will be any significant commercial impact with Sanctuary designation.

We appreciated the opportunity to review your document and hope you find these comments helpful.

Sincerely,

W. LLOYD FINK
Division of Engineering
Office of Naval Architecture
and Engineering

cc.
Mr. Edward Wilczynski
Acting Chief
Ecology and Conservation Division
Room 6814
National Oceanic and Atmospheric Administration
U.S. Department of Commerce
Washington, DC 20230

Assembly
California Legislature

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DAN HAUSER

ASSEMBLYMAN, SECOND DISTRICT

CHAIRMAN
COMMITTEE ON HOUSING AND COMMUNITY DEVELOPMENT

COMMITTEES
ECONOMIC DEVELOPMENT AND NEW TECHNOLOGIES
LOCAL GOVERNMENT
WATER, PARKS AND WILDLIFE
VICE CHAIRMAN
JOINT COMMITTEE ON FISHERIES & AQUACULTURE
PACIFIC FISHERIES LEGISLATIVE TASK FORCE
MEMBER
COMMISSION ON CALIFORNIA DEVELOPMENT

September 29, 1987

Mr. Edward Wilczynski, Acting Chief
Ecology and Conservation Division
U.S. Department of Commerce, Room 6814
Washington, DC 20230

Dear Mr. Wilczynski:

As the Legislator representing the 2nd Assembly District, I authored AJR 91, co-sponsored by Senator Barry Keene. Enacted in 1986, this Resolution calls upon the Congress of the United States to create a marine sanctuary on the California Coast.

I have asked my representative to be here this evening to express my strong support for the federal designation of the Cordell Bank National Marine Sanctuary.

1
2 I would like my position to be very clear that I support the prohibition of the OCS gas and oil leasing, exploration, development and pipeline construction activities, and that this prohibition should be included in the Boundary Alternative #1 from the beginning.

I am committed to the constituency of the North Coast and their desire to protect the coastline of California. The creation of the proposed Cordell Bank Marine Sanctuary would assure at least a portion of the coastal protection I seek.

Sincerely,

Dan Hauser

DH/ge

1. See Generic Response B.

2. See Generic Response A.

STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, Governor

CALIFORNIA COASTAL COMMISSION
631 HOWARD STREET, 4TH FLOOR
SAN FRANCISCO, CA 94105
(415) 543-8555

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Ave., N.W.
Washington, D.C. 20235

Re: Cordell Bank National Marine Sanctuary: Draft Environmental Impact Statement/Management Plan

Dear Ms. Allin:

Thank you for the opportunity to comment on the DEIS for the Cordell Bank National Marine Sanctuary. The following are the Coastal Commission staff comments.

Commission staff strongly supports the designation of the sanctuary, and applauds the plans for research and education. Through this effort the public will be able to greatly enhance their understanding of the bank and its importance to the ecology of the central coast. Cordell Bank sustains a unique benthic community, and is surrounded by a highly productive foraging area for rockfish and other finfish, seabirds, and marine mammals. The bank also supports both commercial and recreational fishing.

The resource protection afforded by the proposed sanctuary regulations and proposed boundary is, however, quite inadequate. We strongly recommend that:

1 1. Hydrocarbon exploration and development activities, including seismic surveys, be prohibited, and regulations implementing this hydrocarbon ban be a part of the initial designation document.

2 2. The boundary include a much wider area; we support boundary alternative #1.

These changes to the plan will substantially lessen the likelihood of oil spills reaching the bank and the waters surrounding it, and prevent drilling discharges and seismic survey activity from damaging the resources and current uses of the bank. These impacts and risks are well enough understood at this time, and should be regulated from the outset. Later monitoring will, in the case of oil spills, only provide an assessment of risks and/or damage. Contingency plans, while worthwhile, are unlikely to result in much protection for the resources. Prohibition of hydrocarbon exploration and development activities at the bank and within the surrounding area will provide much better protection.

1. See Generic Response B.

2. See Generic Response A.

Under the regulations as proposed, birds and marine mammals will be protected from hydrocarbon exploration and development activities while within the Gulf of the Farallones Marine Sanctuary, but will not be protected when they move to the waters surrounding Cordell Bank to forage. Cordell Bank and the surrounding waters are key to the continued maintenance of the abundant populations of seabirds and marine mammals so unique to this area of the Central California Coast. To protect these resources within the Gulf of the Farallones Marine Sanctuary and not within the Cordell Bank Marine Sanctuary is inconsistent.

Designation of an area contiguous with the Gulf of the Farallones Marine Sanctuary, i.e. boundary alternative #1, is necessary to adequately protect the resources. Regulation enforcement and management will be very difficult if the boundary is small and separated from the current sanctuary, as is true of boundary alternative #2.

Staff's specific comments and questions are as follows:

3 P. 42, (c) What is the rationale for the 50 fathom contour? Please expain how monitoring of the activity within 1 nautical mile will help to protect resources. To clarify the impact of the military operations exemption, information on the contribution of these operations to harmful discharges should be included in the EIS.

4 P. 42, 3. Oil spill contingency plans for the marine sanctuary should include marine wildlife cleaning and rehabilitation, especially for birds. Bird cleaning has been done successfully, but unnecessary mortality has resulted from confusion over responsibilities and funding.

5 P. 44, 5. Assessment of the impacts and risk to marine resources from commercial shipping should be included in the research/monitoring plans, along with recommendations for lowering or mitigating this risk.

6 P. 64, 1. Boundary alternative #1 would not only provide more protection for marine mammal habitat, it would also provide for more coherent management, enforcement, and interpretation, education and research programs. It will be particularly difficult to regulate discharges which are likely to affect the sanctuary when the area is as small as boundary alternative #2.

7 P. 75 Seismic survey impacts to both fish populations and fisheries should be discussed in the "Environmental Consequences of Alternatives" section. Regulations to prohibit this activity near Cordell Bank should be included.

3. The fifty-fathom isobath represents an artificially determined demarcation point for the resources of Cordell Bank. The vast majority of the benthic resources are found above the 30-fathom isobath. Highest concentrations of pelagic and demersal species that depend on the Bank for food are usually found within the 50-fathom isobath.

The monitoring provision now applies throughout the Sanctuary. The requirement of a monitoring program or other scientific research is necessary to measure the effects of any hydrocarbon activities on Sanctuary resources.

See Generic Comment I. NOAA encourages and will supporty to the degree possible fisheries research on Cordell Bank, including studies of commerically valuable fish stocks.

4. NOAA is preparing a Contingency and Emergency Response Plan for all National Marine Sanctuaries that will coordinate and inform all necessary agencies and experts in the event of an emergency such as an oil-spill. Sanctuary staff will assist in the coordination of effort to ensure responsibilities are well defined, and that adequate resources are available. The appropriate organizations for bird cleaning operations will be detailed in the Emergency Response Plan.

5. NOAA will work in conjunction with the USCG to ensure a minimization of risks to the Sanctuary resources from vessel traffic. See Generic Response H.

6. See Generic Responses A and F.

7. See Generic Response B. The provisions of the Marine Mammal Protection Act of 1972 and the Endangered Species Act prohibit the taking of marine mammals and endangered species, respectively, with limited exception. Taking is defined under both acts to include harassment. If seismic activities have no more than a negligible impact on the species then taking is permitted under Section 101(a)(5) of the MMPA. The potential impact of seismic surveys will be monitored by the Sanctuary staff to determine if the resources of Sanctuary are jeopardized or threatened by the seismic activities.

There is no apparent need to propose additional prohibitions that would duplicate current State and Federal statutes protecting marine resources from activities described.

8

P. 82 Resource information points out that one of the special characteristics of this area is the clarity of the water, which allows species such as Allopora californica to grow. Therefore, a more detailed discussion of the possible effects of drilling discharges is needed. What would be the extent of the plume, area of deposition, change in light levels, and expected change in biota (particularly algae) if drill muds were discharged in or near Cordell Banks? While there is still disagreement about all the impacts of drill muds, there is general agreement that the area surrounding a drill site is impacted by discharge and deposition of muds and cuttings. Please support in more detail the sentence at the end of paragraph 3. Are the longshore currents that much stronger than in other areas?

9

P. 85 para 1 Oil development activities should be regulated now. This is a unique and special area which depends on very good water quality. The purpose of sanctuary designation is long-term protection. It is immaterial that Cordell Bank is not part of the current 5-year lease sale, since this is only temporary protection. If regulations were added later, what is the procedure for doing so. Please outline in detail what precautions could be taken, and what improvements made to contingency planning.

10

P. 86 3. More specific data on location of marine mammal sightings should be part of this EIS. Page 26 only refers to "Cordell Bank Vicinity" and the species descriptions (pp. 26-29) are vague. We would like to see a map with sightings, if possible.

11

P. 89 para 3 Staff agrees that long-term protection from the effects of hydrocarbon development activities is inadequate. Such protection should be afforded this marine sanctuary through a regulation prohibiting such activities.

Thank you for your consideration of these comments. If you have questions, please call me or Susan Hatfield at (415)543-8555.

Sincerely,

Susan Hansch

Susan Hansch
Manager, Energy and Ocean Resources

0422N

8. EPA published an "Assessment of Environmental Fate and Effects of Discharges from Offshore Oil and Gas Operations (1985) that describes in detail the different components of the drilling fluids, cuttings and discharged water. However, our understanding of the environmental transport fate and toxicity of these components is still not fully understood. Environmental factors that affect the dispersion and transport of discharged material include waves, current direction and velocity and bottom topogaphy. The environmental effects of the drilling materials and fluids are therefore very difficult to predict. NOAA has prohibited all discharges and depositing of harmful substances that enter the Sanctuary and injure Sanctuary resources. NOAA will continue to monitor the Sanctuary resources and the activities that could potentially injure those resources.

9. See Generic Response B.

10. See response number 3.

11. See Generic Response B.

STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF FISH AND GAME
1416 NINTH STREET
SACRAMENTO, CALIFORNIA 95814
(916) 445-3531

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

The California Department of Fish and Game has reviewed the Draft Environmental Impact Statement/Management Plan regarding the proposed Cordell Bank National Marine Sanctuary, and while we are very supportive of the area being so designated, we are concerned that the draft may not adequately address the issue of the existing jurisdictions and management.

1 To more adequately address our concerns, the Department recommends that on Page 103 within Article 5, Section 1, the second sentence be amended to read, "All state and federal regulatory programs pertaining to fishing, including Fishery Management plans promulgated under the Magnuson Fishery Conservation and Management Act, 16 U.S.C., §§ 1801 et seq., will remain in effect."

In addition, the Department recommends that on Page 115, under the listing,

"State

1. California Department of Fish and Game", the paragraph be amended to read:

2 "The California Department of Fish and Game (CF&G), under the Fish and Game Code (and Chapter 14 of the Administrative Code), regulates and manages a wide variety of activities affecting the living marine resources found in the territorial sea and in the 200-mile wide exclusive economic zone. The focus of the Department's activities in Cordell Bank waters consists of the enforcement of state laws in areas that are not administered under federal regulations such as those Federal authorities listed below."

I am sure from my reading of this draft that you did not intend to impact Department management. I'm confident that appropriate changes can be made to answer our concerns.

Sincerely,

Pete Bontadelli
Acting Director

cc: Edward Wilczynski, Acting Chief,
Ecology and Conservation Division, NOAA

OCT 1987 RECEIVED

1. This has been corrected in the FEIS/MP.

2. This has been corrected in the FEIS/MP.

State of California

Memorandum

To : Gordon Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, California 95814

Attn: Projects Coordinator

Date : October 7, 1987

From : Department of Fish and Game

Subject: Draft Environmental Impact Statement/Management Plan (DEIS/MP) for the Cordell Bank National Marine Sanctuary, SCH 87092307

The Department of Fish and Game (Department) has reviewed the DEIS/MP for the Cordell Bank National Marine Sanctuary. We concur with the DEIS/MP finding that the Bank possesses resources and habitat of special national significance and we strongly support the proposal for the designation of the Bank and adjacent waters as a National Marine Sanctuary.

In our view, the goals of resource protection, research, and public education, as outlined in the DEIS/MP, are both worthy and reachable. We see that existing recreational and commercial fisheries will not be adversely affected by this proposal and are encouraged by the fact that, should these goals be met, they could be enhanced.

3 All this notwithstanding, it appears to us that a major provision for the "protection of the Bank's resources and conservation of its habitat" is not adequate. We refer to the one relating to oil and gas development, which indicates that, should such development be permitted in the future, a regulation may be promulgated prohibiting operations within part of the sanctuary and requiring monitoring in another portion. The prohibition zone in this case is composed of those waters that lie within the 50-fathom isobath and the monitoring zone is the area within 1 nautical mile of this contour. We feel that the DEIS/MP substantially underestimates the potential adverse impacts upon the Bank, its resources, and their fisheries from oil and gas development nearby, and relies too heavily upon the fact that the Department of the Interior has not included the immediate area in its current 5-year lease sale plan. It is apparent that the aforementioned regulation does not provide the necessary safeguards in the event that exploration and drilling are proposed at a later date.

3. See Generic Response B.

4 Additionally, the proposed size of the sanctuary in the Preferred Alternative (101 square nautical miles) is not sufficiently extensive as to provide an adequate buffer to the hazards of oil and gas industry operations, and its configuration leaves gaps between its boundaries and those of the Point Reyes-Farallon Islands National Marine Sanctuary (PRNMS).

4. See Generic Response A.

Therefore, the Department recommends that the Final EIS/MP select Alternative I, which proposes a sanctuary of 397 square nautical

miles and whose borders are contiguous with those of the PRNMS, as well as incorporate a regulation which precludes all oil and gas development activities within the sanctuary.

Department personnel are available to discuss our concerns in greater detail. To arrange for discussion, contact Robert N. Tasto, Marine Resources Laboratory, 411 Burgess Drive, Menlo Park, CA 94025, telephone (415) 326-0324.

Pete Bontadelli
Acting Director

CENTRAL COAST OCS
REGIONAL STUDIES
PROGRAM
1725 Montgomery Street
San Francisco, CA 94111
415 398-3355

CENTRAL COAST
COUNTIES
Board of Control

SONOMA
Ernie Carpenter

MARIN
Gary Giacomini

SAN FRANCISCO
Nancy G. Walker

SAN MATEO
Anna G. Eshoo

SANTA CRUZ
Gary Patton

MONTEREY
Marc J. Del Piero

REGIONAL
COORDINATOR
Warner Chabot

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20235

October 7, 1987

Dear Ms. Allin:

1 As Supervisors of six coastal counties, we want to express our support for designation of the Cordell Bank Marine Sanctuary. We recommend Boundary Alternative #1, to provide continuity between the Gulf of the Farallones and the proposed Cordell Bank Marine Sanctuary. We further recommend that the Sanctuary's management policies include regulations prohibiting hydrocarbon activities.

The Cordell Bank area provides a rich diversity of biological resources which are valued for their research and recreational value. The richness of this habitat is also reflected by its importance to the commercial fishing industry.

The area is also very sensitive to pollution. Adequate buffers are necessary to protect the Cordell Bank resources from activities which could potentially damage these unique resources. Alternative #1 is the only alternative which could provide an adequate buffer. This alternative also completes the logical continuity between the Cordell Bank and the adjacent Gulf of the Farallones Marine Sanctuary.

We further recommend that Sanctuary regulations include the same prohibition on hydrocarbon activities which apply to the Gulf of the Farallones Marine Sanctuary. Without this protection the idea of a Marine Sanctuary makes little sense. Exclusion of the Cordell Bank area from the Department of the Interior's 5-Year plan is not adequate justification for postponing a decision on this critical management policy. The area covered in Alternative #1 is small compared to the overall size of the Central California Planning Area.

An extensive regulatory analysis was performed for the Commerce Department in 1982, which confirmed the validity of continuing the hydrocarbon activities ban in the adjacent Gulf of the Farallones Marine Sanctuary. That analysis concluded that:

- The boundaries were established to protect the unique biological resources.
- Oil drilling may result in one or more catastrophic oil spills.

1. See Generic Response A.

2. See Generic Response B.

- A ban on oil drilling would not harm the oil industry since the area is not a high priority for oil development.

- Existing technologies (i.e. slant drilling), would allow recovery of more than 1/2 of the oil and gas resources estimated within the Sanctuary.

We contend that similar conclusions can be applied to the proposed Cordell Bank Sanctuary under the boundaries proposed in Alternative #1. We therefore endorse boundary Alternative #1 and urge that the management regulations prohibit hydrocarbon activities within the Sanctuary.

Respectfully,

Sonoma County Supervisor Ernie Carpenter

Marin County Supervisor Gary Giacomini

City and County of San Francisco
Supervisor Nancy Walker

San Mateo County Supervisor Anna Eshoo

Santa Cruz County Supervisor Gary Patton

Monterey County Supervisor Marc Del Piero

cc Senator Alan Cranston
Senator Pete Wilson
Congressman Doug Bosco
Congresswoman Nancy Pelosi
Congressman Tom Lantos
Congressman Leon Panetta
Congresswoman Barbara Boxer

THE BOARD OF SUPERVISORS OF MARIN COUNTY

ADMINISTRATION BUILDING
SUITE 315, CIVIC CENTER
SAN RAFAEL, CALIFORNIA 94903
TELEPHONE (415) 499-7331

October 7, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

This is to advise that the Marin County Board of Supervisors, at its regular meeting on October 6, 1987, voted unanimously to adopt Resolution No. 87-351 in support of the Cordell Bank National Marine Sanctuary.

A copy of the Resolution is enclosed herewith.

Very truly yours,

HAROLD C. BROWN, JR.
Chairman

HB/pf

Enc.

Chairman
BOB ROUMIGUIERE, San Rafael, 1st District
HAROLD C. BROWN JR., San Anselmo, 2nd District
Vice Chairman
AL ARAMBURU, Tiburon, 3rd District
GARY GIACOMINI, San Geronimo, 4th District
BOB STOCKWELL, Novato, 5th District
Clerk
MARGARET P. COUNCIL
Regular Meeting
Tuesday, 9A.M.

RESOLUTION No. 87-351

RESOLUTION IN SUPPORT OF
THE CORDELL BANK NATIONAL MARINE SANCTUARY

WHEREAS, the Office of Ocean and Coastal Resource Management of the National Oceanic and Atmospheric Administration (NOAA) has prepared and circulated a Draft Environmental Impact Statement on the proposed Cordell Bank National Marine Sanctuary; and

WHEREAS, comments from affected governmental agencies and interest groups on the Cordell Bank Sanctuary proposal are being solicited by NOAA until October 12, 1987; and

WHEREAS, the coastal and marine resources of the County of Marin would receive significant protection from federal designation of the Cordell Bank National Marine Sanctuary; and

WHEREAS, the County of Marin recognizes the extreme vulnerability of the biological resources of the Marin coastline, Tomales Bay, and the Gulf of the Farallones to environmental impacts associated with OCS oil and gas exploration and development;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors of the County of Marin hereby expresses its support for federal designation of the Cordell Bank National Marine Sanctuary; and

1 BE IT FURTHER RESOLVED, that the Board of Supervisors of the County of Marin supports the proposed "Boundary Alternative #1" for the Cordell Bank National Marine Sanctuary as providing the most substantial protective buffer zone for Cordell Bank; and

2 BE IT FURTHER RESOLVED, that the Board of Supervisors of the County of Marin supports a prohibition on OCS oil and gas leasing, exploration, development, and pipeline construction activities to be applied to the full geographic extent of the Cordell Bank Marine Sanctuary at the time of designation of the Sanctuary; and

BE IT FURTHER RESOLVED, that a copy of this resolution be forwarded to the following two addresses to arrive prior to October 12, 1987: Ms. Vickie Allin, Acting Chief, Marine and Estuarine Management Division, Office of Ocean and Coastal Resource Management, National Ocean Service/NOAA, 1825 Connecticut Avenue, N.W., Washington, D.C. 20235; and, Mr. Edward Wilczynski, Acting Chief, Ecology and Conservation Division, Room 6814, U.S. Department of Commerce, Washington, D.C. 20230.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Marin, State of California, held this 6th day of October, 1987, by the following vote:

AYES: SUPERVISORS Al Aramburu, Bob Stockwell, Gary Giacomini, Harold Brown, Jr.

NOES: -

ABSENT: SUPERVISOR Bob Roumiguiere

Harold C Brown

CHAIRMAN OF THE BOARD OF SUPERVISORS

1. See Generic Response A.

2. See Generic Response B.

MONTEREY COUNTY

THE BOARD OF SUPERVISORS

KARIN STRASSER KAUFFMAN, CHAIR
1200 AGUAJITO ROAD
MONTEREY, CALIFORNIA 93940

MARC J. DEL PIERO, VICE CHAIR
P.O. BOX 787
CASTROVILLE, CALIFORNIA 95012

BARBARA SHIPNUCK
P.O. BOX 1004
SALINAS, CALIFORNIA 93902

DUSAN M. PETROVIC
P.O. BOX 946
KING CITY, CALIFORNIA 93930

SAM P. KARAS
1200 AGUAJITO ROAD
MONTEREY, CALIFORNIA 93940

September 30, 1987

Ms. Vicki Allin, Acting Chief
Marine and Estuarine Management Div., OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Dear Ms. Allin:

1 Monterey County wishes to go on record in support of the creation of a near 400 square nautical mile Cordell Bank National Marine Sanctuary offshore the Point Reyes National Seashore, as identified in Alternative #1 in the Draft EIS/Management Plan for the Sanctuary. We believe the rich concentration of marine life created by the unique Cordell Bank deserves the protection guaranteed by a National Marine Sanctuary. The Cordell Bank area contains a prolific assortment of benthic organisms, large quantities of commercial fish, feeding grounds for fourteen species of marine mammals and at least forty-seven species of seabirds. Four endangered species, including the humpback whale, the blue whale, the brown pelican, and the short-tailed albatross have been observed near Cordell Bank.

2 The Coardell Bank National Marine Sanctuary should also contain a ban on all outer-continental shelf oil and gas leasing, exploration, and development activities as part of the regulatory framework for the entire Sanctuary. Establishment of the Cordell Bank Sanctuary, contiguous to the existing Point-Reyes-Farallon Islands National Marine Sanctuary will provide a logical and continuous scheme of protection. Also, the two

3 Sanctuaries should be combined to facilitate management and administration thereby providing the most economical and effective method of affording protection to the sensitive Cordell Bank area.

1. See Generic Response A.

2. See Generic Response B.

3. The two Sanctuaries have resources that are uniquely distributed both temporally and spatially. A different managment regime is necessary to effectivly manage the two types of Sanctuary environement. However, to minimize costs, the same management facilities will be used by staff from both Sanctuaries.

We appreciate your thoughtful consideration of our comments.

Very Truly Yours,

Karin Strasser Kauffman, Chair
Monterey County Board of Supervisors

KSK:SM:mc

cc: Mr. Edward Wilcynski, Acting Chief, Ecology and Conservation Division, Dept. of Commerce and Mr. C. William Verity, Jr., Secretary Designe, Dept. of Commerce

Department of Environmental Management
Planning and Development Division

☐ **Planning Division** · 415/363-4161
Mail Drop 5500 • 590 Hamilton Street • Redwood City • California 94063

☐ **Building Inspection Section** · 415/363-4601
Mail Drop 5514 • 590 Hamilton Street • Redwood City • California 94063

COUNTY OF SAN MATEO

BOARD OF SUPERVISORS
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MARY GRIFFIN
TOM HUENING
TOM NOLAN
WILLIAM J. SCHUMACHER

PLANNING DIRECTOR
CHRISTINE M. GOUIG

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, DC 20235

Dear Ms. Allin:

We have reviewed the Draft EIS/Management Plan for the proposed Cordell Bank National Marine Sanctuary and wish to express full support of the proposed designation of Cordell Bank as a National Marine Sanctuary. This marine habitat is highly valued for its rich array of biological resources; thus, it deserves the kind of protection that will enable it to flourish and to benefit future generations.

1 We believe that Boundary Alternative No. 1 provides the greatest buffer between the proposed sanctuary and potential future OCS oil and gas development. In addition, it provides a logical link between the proposed Cordell Bank Sanctuary and the Gulf of the Farallones Marine Sanctuary.

2 Boundary Alternative No. 1 comprises only a small portion of the overall Central California OCS Planning Area, and it is our understanding that the oil industry does not consider this area a high priority for oil development. As such, and given the proposed sanctuary's research, recreation and commercial fishing value, the County also strongly supports a permanent ban on OCS oil and gas leasing, exploration and development activities within the sanctuary. Staff recommends that the ban be applied at the time of designation.

If you have any questions regarding our comments, please feel free to contact Maureen Riordan at 363-4161.

Sincerely,

Christine M. Gouig
Planning Director

CMG:MDR:kcd - KIE10197

1. See Generic Response A.

2. See Generic Response B.

PLANNING DEPARTMENT

COUNTY OF SANTA CRUZ

GOVERNMENTAL CENTER
(408) 425-2835

701 OCEAN STREET SANTA CRUZ, CALIFORNIA 95060

October 8, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

As planners of a central California coastal county we want to express our support for designation of the Cordell Bank National Marine Sanctuary. The County of Santa Cruz Planning Department and Board of Supervisors has long been interested and committed to protecting the marine environment. The Cordell Bank is a unique and rich natural resource of vital economic and cultural importance to our coastal county. Our county, as other coastal counties, is economically dependent on California's abundant marine resources for both recreational and commercial fisheries and tourism. A major percentage of fish harvested by our commercial fishermen are caught at the Cordell Banks.

1 We have reviewed the proposed management regulation and while we feel they are generally acceptable, there are several major areas where they are inadequate. To correct that, we recommend that the Sanctuary's management regulations include a prohibition on OCS oil and gas leasing, exploration, and development and offshore dumping for the entire Cordell Bank National Marine Sanctuary. We believe it is important to stress that currently harvested marine resources are renewable in nature, whereas hydrocarbons are a non-renewable resource. The existence of the renewable biological resources are threatened by hydrocarbon activities. It is in the best interests of the nation as a whole that renewable resources not be endangered and that vital habitat for these resources be protected.

2 We would also like to point out that the portion of the proposed sanctuary which is included in Boundary Alternative #1 (but excluded from Boundary Alternative #2) lying to the north and west of the Gulf of the Farallones National Marine Sanctuary, is heavily trafficked by commercial shipping, including oil and chemical tankers and barges. We believe that the potential for environmental disaster resulting from a collision or other similar mishap should weight heavily in favor of Alternative Boundary #1 and the exclusion of hydrocarbon activities. Alternative Boundary #1 also represents a logical extension of the Gulf of the Farallones National Marine Sanctuary.

1. See Generic Response B.

2. See Generic Response A.

BOARD OF SUPERVISORS
(408) 425-2201

COUNTY OF SANTA CRUZ

GOVERNMENTAL CENTER 701 OCEAN STREET SANTA CRUZ, CALIFORNIA 95060-4069

DAN FORBUS (FIRST DISTRICT) ROBLEY LEVY (SECOND DISTRICT) GARY A. PATTON (THIRD DISTRICT) SHERRY MEHL (FOURTH DISTRICT) JOE CUCCHIARA (FIFTH DISTRICT)

October 1, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division, OCRM
National Ocean Service/NOAA
1825 Connetticut Avenue, N. W.
Washington, D.C. 20235

RE: DESIGNATION OF CORDELL BANK MARINE SANCTUARY

Dear Ms. Allin:

I am writing with respect to the possible creation of a Cordell Bank Marine Sanctuary, presently being considered by the National Oceanic and Atmospheric Administration. The Marine Sanctuary is proposed to be located on the outer continental shelf, twenty miles west of Point Reyes, in Northern California. I am very much familiar with this area, having been born in San Francisco, and having grown up in the San Francisco Bay area. I now reside in Santa Cruz County, some 80 or 90 miles south of the proposed Marine Sanctuary area.

I strongly support the creation of a Cordell Bank Marine Sanctuary. The Cordell Bank area is of extreme biological significance, and is worthy of marine sanctuary designation. Further, I believe that of the two boundary alternatives being considered, it is critically important that Boundary Alternative #1 be selected. This would, essentially, extend the existing Point Reyes-Farallon Islands National Marine Sanctuary to include all of the areas around and affected by activities near Cordell Bank. I understand that the DEIS lists a much smaller area, so-called "Boundary Alternative #2," as a "preferred" alternative. I do not believe that the smaller designation is to be preferred, since more protection would be provided to the significant biological area of the Cordell Bank by the adoption of Alternative #1, which extends the existing Marine Sanctuary.

1. See Generic Response A.

The Cordell Bank is an important and unique habitat that should be preserved. Creation of the proposed sanctuary, with adequate management regulations, will help guarantee the survival of the Cordell Bank habitat and the important marine resources which it supports. Thank you for your consideration of these comments. Please feel free to contact Donna Bradford or myself at (408) 425-3069 if there is a need for further clarification of these issues.

Respectfully,

Peter Cota-Robles
Resources Program Manager

PC-R/DB/lf

cc: County Administrative Office
Mr. Edward Wilcynski
Mr. C. William Verity, Jr.

ALLIN

I think it makes sense for management of the new sanctuary to be accomplished in connection with the management and administration of the existing Point Reyes-Farallon Islands Sanctuary. I also believe that it is important that whatever protection is ultimately provided to Cordell Bank, that a ban on OCS oil and gas activities be included.

Thank you very much for considering my comments on this important issue.

Yours truly,

GARY A. PATTON, Supervisor
Third District

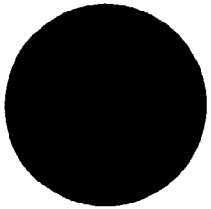
GAP:lg

1215U

2. See Generic Response B.

COUNTY OF SONOMA
BOARD OF SUPERVISORS
575 ADMINISTRATION DR., RM. 100A
SANTA ROSA, CALIFORNIA 95401
(707) 527-2241

EEVE T. LEWIS
COUNTY CLERK



MEMBERS OF THE BOARD
ERNIE CARPENTER
CHAIRMAN
JAMES HARBERSON
VICE CHAIRMAN
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HELEN RUDEE
NICK ESPOSTI

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of Ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Subject: Draft Sanctuary Management Plan for the proposed Cordell Bank National Marine Sanctuary.

Dear Ms. Allin:

Thank you for allowing Sonoma County the opportunity to comment on the above plan. Due to the importance of the marine resources offshore Sonoma County and their significance to coastal fishing and recreation, the Board of Supervisors has authorized me to submit these comments and the attached resolution for your consideration regarding designation of Cordell Bank.

1 Sonoma County supports the designation of Cordell Bank as a National Marine Sanctuary. We recommend, however, that the boundary of the sanctuary conincide with that identified as Boundary Alternative #1 in the Draft Plan. We feel that this boundary best protects both the Bank resources and the marine mammals and seabirds that depend upon them.

2 Sonoma County further recommends that the management plan provide for immediate regulation of hydrocarbon development activities. Regulation should include designation the entire sanctuary as a "no activity" zone for oil and gas development. The plan should also include a monitoring program for both baseline studies and impact assessment of existing oil and gas activities (spills and discharges from tankers using nearby shipping lanes).

Thank you for your kind consideration of these comments.

Sincerely,

Ernest L. Carpenter,
Chairman, Board of Supervisors

:csb
dn:cb/g/pg.6

1. See Generic Response A.

2. See Generic Responses B and E.

#45.
Resolution No. 87-1826

Sonoma County Administration Building
Santa Rosa, California

Date: September 29, 1987

THE WITHIN INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE.

ATTEST: SEP 29 1987

EVE T. LEWIS

County Clerk & ex-officio Clerk of the Board of Supervisors of the State of California, In & for the County of Sonoma

By ..... Deputy

RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF SONOMA, STATE OF CALIFORNIA, SUPPORTING FEDERAL DESIGNATION OF CORDELL BANK AS A NATIONAL MARINE SANCTUARY AND AUTHORIZING THE CHAIRMAN TO SUBMIT COMMENTS ON THE PROPOSED SANCTUARY MANAGEMENT PLAN TO APPROPRIATE AUTHORITIES.

WHEREAS, the Cordell Bank has been nominated as a candidate site for *designation as a National Marine Sanctuary by the U.S. Department of Commerce,* National Oceanic and Atmospheric Administration pursuant to Title III of the Marine Protection, Research and Sanctuaries Act of 1972 as amended; and

WHEREAS, Cordell Bank supports a unique and abundant population of marine life and consequently is an important feeding ground for many fishes, seabirds, and marine mammals; and

WHEREAS, Cordell Bank waters are inhabited by large numbers of rock fish, which support significant commercial and recreational fishing in the area; and

WHEREAS, designation of the area as a sanctuary would provide federal policy and regulation of human activities which would give the highest priority to *protection of biological and fishery resources necessary for support of the* coastal dependent fishing industry; and

WHEREAS, such fishing industry is important to the coastal economy of Sonoma County; and

WHEREAS, oil and gas development in the vicinity of Cordell Bank may have significant adverse impacts on its biological resources and coastal fisheries; and

WHEREAS, the designated sanctuary boundary should encompass not only the marine resources directly attributed to the Cordell Bank but also the complete feeding grounds and other habitats of marine mammals and seabirds associated with Cordell Bank.

NOW THEREFORE BE IT RESOLVED that the Board of Supervisors does hereby support federal designation of Cordell Bank as a National Marine Sanctuary, including the area identified as "Boundary Alternative No. 1".

NOW THEREFORE BE IT FURTHER RESOLVED that the Board does hereby authorize the Chairman to submit this resolution and related comments to the U.S. Department of Commerce, National Oceanic and Atmospheric Administration and to the appropriate public officials.

THE FOREGOING RESOLUTION was introduced by Supervisor

SUPERVISORS VOTE:

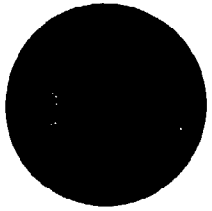
Nicholas: Aye Harberson: Aye Rudee: Aye Esposti: Aye Carpenter: Aye

ayes: 5 noes: 0 absent: 0 abstain: 0

SO ORDERED.

COUNTY OF SONOMA
BOARD OF SUPERVISORS
575 ADMINISTRATION DR., RM. 100A
SANTA ROSA, CALIFORNIA 95403
(707) 527-2241

EEVE T. LEWIS
COUNTY CLERK



MEMBERS OF THE BOARD
ERNIE CARPENTER
CHAIRMAN
JAMES HARBERSON
VICE CHAIRMAN
JANET NICHOLAS
HELEN RUDEE
NICK ESPOSTI

September 29, 1987

Ms. Vickie Allin, Acting Chief
Marine and Estuarine Management Division
Office of ocean and Coastal Resource Management
National Ocean Service/NOAA
1825 Connecticut Avenue, N.W.
Washington, D.C. 20235

Dear Ms. Allin:

You have been presented a Resolution and letter under separate cover which indicate the position of the Sonoma County Board of Supervisors in supporting sanctuary status for the Cordell Bank. The Board has chosen Alternative One, the larger area. I would like to add additional comments as the Supervisor representing the entire Sonoma Coast.

First, it is vitally important that you support the expanded Cordell Bank National Marine Sanctuary. We are concerned that the Department of Interior will lease these important areas for offshore oil development to the detriment of the fisheries industry, tourism, and the environment. I ask that you not only support the Sanctuary; the expanded boundary; but, that you ban all oil exploration and drilling development within the boundary.

1
2

Sonoma County is energy conscious. We have the largest geothermal-power generation area in the world with the capability of producing 10% of California's energy need. At the height, before the price of oil declined, we were producing 5% of California's power needs. The field is curreatly producing 1900 megawatts of energy today but we currently have a limited market because of cheaper oil fired energy generation.

What an irony. The steam developers can produce needed power but they can't sell it because oil is cheap. When oil goes up, we sell efficient and relatively clean power. The point: we can produce more power without offshore oil to the benefit of the nation. Moreover, we need protection for marine life as much as we need whatever limited oil reserves that may be found near the Cordell Bank.

1. See Generic Response A.

2. See Generic Response B.

3 Finally, I ask that you allow fishing regulations to remain under California Fish and Game and the Pacific Fisheries Management Council. They have successfully managed the Channel Island and Gulf of the Farralones sanctuaries. Neither the County or I would have objections to both commercial and sport fishing in the sanctuary area.

Thank you for your most positive consideration to this vital protection to our marine environment.

Sincerely,

Ernie Carpenter
Fifth District Supervisor

EC:po

3. See Generic Response I.

COMMENTS RECEIVED AT HEARINGS

COMMENT

Jenner Community Club, Jenner Coastside Conservation Coalition and Committee to Save the Russian River, September 29, 1987.
Summary of comments made by Mr. Hechtman at the public Hearings on the Proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California.

We favor the proposal and determine the Sanctuary would enhance the fisheries. We support the Boundary Alternative No. 1 and do not want any offshore drilling or development within the entire Sanctuary.

RESPONSE

See Generic Responses A and B.

COMMENT

Environmental Action Committee, Inverness Association and the Tonales Bay Association, September 29, 1987.
Summary of comments made by Carl Munger at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California.

We support the Boundary Alternative No. 1 and we hope you will keep oil out of it.

RESPONSE

See Generic Responses A and B.

COMMENT

Bodega Bay Marine Laboratory, September 29, 1987.
Summary of comments made by Jim Clegg at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California.

We favor the proposal and designate a Sanctuary and would concur that the research opportunities are fantastic. We support a Boundary Alternative larger than No. 1 and do not want any exploration for oil within the entire Sanctuary.

RESPONSE

NOAA will develop a research program to further increase our understanding of the Bank ecosystem. NOAA encourages the full participation of the scientific community in organizing and executing this research program. Also, see Generic Responses A and B.

COMMENT

Friends of the Coast, September 29, 1987.
Summary of comments made by Lionel Gambill at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California.

We favor the proposal and want a ban on offshore oil drilling and on sewage outfalls within the Sanctuary area. We support Boundary Alternative No. 1.

RESPONSE

See Generic Responses A, B and C.

COMMENT

Summary of comments made by an unidentified individual, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I am concerned that there may be restrictions to fishing activities added to the Sanctuary regulations in the future.

RESPONSE

See Generic Response I.

COMMENT

Summary of comments made by Mr. Satery, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation and would like to see the largest possible boundary extended to include Bodega Canyon. I also would like to see a ban on offshore drilling and a to consider the plans for a proposed sewage outfall pipe.

RESPONSE

See Generic Responses A, B and C.

COMMENT

Summary of comments made by Hans Schroeder, owner of Porto Bodega Marina, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the designation of the Sanctuary and also support a limited right of entry to oil and companies for access to mining and exploring offshore resources out of Bodega Bay.

RESPONSE

See Generic Response B.

COMMENT

Summary of comments made by Richard Charter, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation and Boundary Alternative No. 1. I believe there needs to be a ban on all OCS oil and gas activities to the entire Cordell Bank Sanctuary and a ban on the proposed sewer outfall.

RESPONSE

See Generic Response A, B, C.

COMMENT

Summary of comments made by Ms. Wood, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation and keeping all oil interests out.

RESPONSE

See Generic Response B.

COMMENT

Summary of comments made by Richard Nelson, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation and a larger boundary beyond and to the North of Boundary Alternative No. 1. to include another biologically significant area. I also urge more money to be made available to do the proper kinds of research and patrols.

RESPONSE

See Generic Responses A and G.

COMMENT

Summary of comments made by Adrian Morgan, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation and Boundary Alternative No. 1 to include Bodega Canyon. I believe there needs to be a ban on all OCS oil and gas activities to the entire Cordell Bank Sanctuary.

RESPONSE

See Generic Responses A and B.

COMMENT

Summary of comments made by an unidentified individual, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I am concerned about vessel traffic safety in the area and would like to see a ban on the passage of oil tankers within the Sanctuary. I also want a ban on oil and gas activities.

RESPONSE

See Generic Response B and H.

COMMENT

Summary of comments made by Alan Laterell, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation and Boundary Alternative No. 1 to be expanded to include the bluffs and Bodega Canyon. I do not want to see any OCS oil and gas activities or any sewage within the Sanctuary.

RESPONSE

See Generic Response A, B, C.

COMMENT

Summary of comments made by Michael Gold, at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at Bodega Bay, California, September 29, 1987.

I support the Sanctuary designation.

RESPONSE

Comment accepted.

COMMENT

Center for Whale Studies, September 30, 1987.
Summary of comments made by Peter Falcon at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at San Francisco, California.

We support the designation of the Sanctuary and prefer Boundary Alternative No. 1.

COMMENT

Central California Council of Diving Clubs, September 30, 1987.
Summary of comments made by Clay Phipps at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at San Francisco, California.

We support the designation of the Sanctuary and prefer Boundary Alternative No. 1 coupled with the prohibition on hydrocarbon development.

COMMENT

Summary of comments made by an unidentified individual at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at San Francisco, California, September 30, 1987.

I am concerned about shipping safety and accidental oil spills. I would like to see efforts made to reroute shipping traffic away from the Sanctuary.

COMMENT

Summary of comments made by an unidentified individual at the public Hearings on the proposed Cordell Bank National Marine Sanctuary at San Francisco, California, September 30, 1987.

I am concerned about shipping safety and minimizing the risk of collision in the vicinity of Cordell Bank. I also would like to see fines for Sanctuary violations returned to NOAA for Sanctuary restitution and research.

RESPONSE

See Generic Response A.

RESPONSE

See Generic Responses A and B.

RESPONSE

See Generic Response H.

RESPONSE

See Generic Response H. Title II of the Marine Protection, Research and Sanctuaries Act (the Act), which was recently reauthorized by Congress and signed into law on November 17, 1988, now provides that a portion of all civil penalties recovered for a violation of Sanctuary regulations be used to pay for storage and care of Sanctuary resources and property seized during violations, and for the payment of rewards for persons who furnish information leading to an assessment of a civil penalty. In addition, the Act now provides that NOAA may recover its emergency response and damage assessment costs from penalties received for damages to natural resources. Further, such penalties are to be used to restore and replace lost resources whenever possible, and to otherwise improve the management of the Sanctuary, where resources were damaged.

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