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Dave Feliz  
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Paul Michel  
Monterey Bay NMS

Dr. Steve Lindley  
NMFS

LCDR Jason Brand  
US Coast Guard

**Sanctuary Advisory Council**  
**Monterey Bay National Marine Sanctuary**  
99 Pacific Street, Building 455E  
Monterey, CA 93940  
(831) 647-4201

Mr. Paul Michel, Superintendent  
Monterey Bay National Marine Sanctuary  
99 Pacific Street, Building 455A  
Monterey, CA 93940

Dear Superintendent Michel,

National marine sanctuaries are designated in recognition of nationally significant oceanographic, geological, biological and archaeological characteristics. These federal waters are a national treasure that are integral to the history, culture, economy, environment and values of all Americans. Given the threats to our coasts and oceans from extractive offshore energy development, urban and rural pollution and climate change, we must strengthen and keep intact our national marine sanctuaries.

Monterey Bay National Marine Sanctuary is home to one of the most diverse and abundant wildlife assemblages in the world. The ocean upwelling and the diversity of habitats creates an outstanding productive marine area providing opportunities for sport and commercial fishing, kayaking, tide pooling, whale watching, diving and boating. Our local and regional communities benefit economically from the visitors that are attracted to the protected natural beauty of the sanctuary.

The Davidson Seamount expansion added a vital and integral area to Monterey Bay National Marine Sanctuary. Seamounts are known to offer unique biological environments and to contain unusual species and species assemblages. A number of previously unknown species of deep sea coral have been identified on this seamount. It is one of the largest seamounts in the world and the only one currently protected by sanctuary status in the United States. The Davidson Seamount is a pristine undersea mountain habitat off the coast of Central California, 70 nautical miles to the southwest of Monterey and 65 nautical miles west of San Simeon. At 23 nautical miles long and 7 nautical miles wide, it is one of the largest known seamounts in U.S. waters. From base to crest, the seamount is 7,480 feet tall, yet its summit is still 4,101 feet below the sea surface. The seamount is home to fragile, large, cold-water coral colonies with some species several hundred years old.

The diversity and abundance of the species Davidson Seamount supports requires national marine sanctuary protection to continue to survive and thrive. Any kind of harmful extractive developments such as oil drilling and mineral mining should remain prohibited.



Considered highly valuable nursery habitat for commercial fisheries, the benthic habitat of the Davidson Seamount is also protected by the National Marine Fisheries Service as a "Habitat of Particular Concern", with all bottom-contacting fishing gear disallowed. This exceptional and sensitive area would be impacted by opening it up for energy development and oil, gas and mineral mining operations. Any review of the Seamount expansion needs to include a greater focus on the seamount's unique habitat and environment and its vital role in the California Current.

The Davidson Seamount expansion was developed as part of the MBNMS's Management Plan Review which included extensive public input from twenty public scoping meetings, over 12,000 written comments, twenty Sanctuary Advisory Council meetings, and sixty-eight meetings of volunteer working groups, offering input and recommendations regarding which issues MBNMS staff must address and how to address them. The invaluable time provided by members of the public and government agencies to offer advice and guidance to MBNMS in public meetings alone totals well over 8,000 hours in the development of the plan. We submit for the record the Monterey Bay National Marine Sanctuary Davidson Seamount Management Zone Management Plan at [http://montereybay.noaa.gov/research/techreports/dsmz\\_plan\\_v6.pdf](http://montereybay.noaa.gov/research/techreports/dsmz_plan_v6.pdf) and the Monterey Bay National Marine Sanctuary 2008 Management Plan Environmental Impact Statement at <http://montereybay.noaa.gov/intro/mp/feis.html>.

The California Current's nutrient-rich upwelling zone originating off Point Arena and flowing south into the sanctuaries is considered to be one of the most productive in North America. Cordell Bank and Greater Farallones National Marine Sanctuaries represent globally significant, extraordinarily diverse, and productive marine ecosystems that encompass areas as varied as estuarine wetlands, rocky intertidal habitat, open ocean and shallow marine banks. They include areas of major upwelling where nutrients come to the surface and support a vast array of sea life including 25 endangered or threatened species, 36 marine mammal species, including blue, gray and humpback whales, harbor seals, elephant seals, Pacific white-sided dolphins, and one of the southernmost U.S. populations of Steller sea lions; over a quarter million breeding seabirds; and one of the most significant white shark populations on the planet.

In summary, the Davidson Seamount is a unique fragile and vulnerable habitat that could not survive energy exploration and production.

We strongly SUPPORT the inclusion of Davidson Seamount in Monterey Bay National Marine Sanctuary for both its ecological importance and the socioeconomic value it brings to our communities. We strongly OPPOSE any efforts to open any part of Davidson Seamount, and the expansion areas of Cordell Bank and Greater Farallones to extractive energy development, mineral mining or benthic habitat disturbance.

In response to the call for comments and review of the national marine sanctuaries, please submit these comments on behalf of the Monterey Bay National Marine Sanctuary Advisory Council.

Sincerely,



Margaret (PJ) Webb  
Advisory Council Chair