



CITIZENS COMMITTEE TO COMPLETE THE REFUGE

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The Honorable Wilbur Ross
Secretary
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

24 July 2017

Dear Secretary Ross,

On behalf of the Citizens Committee to Complete the Refuge and our 2,000 members, we are writing to urge that the Channel Islands, Monterey Bay, Cordell Bank and Greater Farallones Marine Sanctuaries and the Papahānaumokuākea Marine National Monument be retained at their current size and with their existing levels of protection. Our comments are focused on the five mentioned national marine sanctuaries, however; it should be noted that comments regarding the value of keeping these sanctuaries intact and with their current levels of protection pertain to all of the National Marine Sanctuaries and Marine Monuments under review. The protection of natural resources within the boundaries of these sanctuaries and monuments results in benefits that accrue for the greater oceanic ecosystem and citizens of the United States.

The value of protecting intact, national marine sanctuaries and monuments and their extraordinary natural resources extends to each of the other six national marine sanctuaries under review. These marine sanctuaries are indeed, national natural treasures. They were each designated to permanently protect the irreplaceable resources they support. The very existence of the national marine sanctuaries and monuments, are the result of the decades of bipartisan support expressed by our federal, state, and local elected officials and based upon thoughtful and constructive participation by the millions of citizens who consistently called for their designation.

The four California National Marine Sanctuaries not only protect breeding sites for a broad spectrum of marine birds, they also protect vital food resources for these species and other species as well. Protecting these sites from overfishing has kept these forage stocks sustainable and helped support birds, larger fish, and marine mammals alike.

Cordell Bank National Marine Sanctuary:

Numerous marine mammal species are known to frequent the waters of the Cordell Bank Sanctuary. Cordell Bank is one of the most important feeding grounds in the world for endangered blue and humpback whales. Migratory and resident seabirds are dependent upon

the nutrient rich waters of the Cordell Bank and come in the thousands to feed in the rich waters of the marine sanctuary. This sanctuary supports seabirds from far-off locations such as New Zealand and Chile that come to feed during the non-breeding season. Albatrosses nesting on Tern Island (located within the Papahānaumokuākea Marine National Monument also under review) travel thousands of miles to the Cordell Bank Marine Sanctuary to feed during their non-breeding season.

The Greater Farallones National Marine Sanctuary:

The Greater Farallones National Marine Sanctuary is one of the most diverse marine environments in the world providing breeding and feeding grounds for at least twenty-six federally listed endangered or threatened species including blue and humpback whales, Steller sea lions and Marbled Murrelets. Thirty-six species of marine mammals have been documented within the sanctuary waters including gray whales, harbor seals, elephant seals, Pacific white-sided dolphins, and one of the southernmost U.S. populations of threatened Steller sea lions. The sanctuary provides habitat for over a quarter-million breeding seabirds and one of the most significant white shark populations on the planet. Sandy beaches within the sanctuary serve as nurseries for many thousands of elephant seals and sea lions and twenty percent of California's harbor seals breed within the sanctuary in the spring. Recently northern fur seals have returned to breed after an absence of over one hundred years, a testimony of the importance of keeping intact the protections established for this sanctuary.

The Monterey Bay National Marine Sanctuary:

The Monterey Bay National Marine Sanctuary is the largest of a system of 13 National Marine Sanctuaries. A well-known and charismatic resident of the Monterey Bay National Marine Sanctuary is the sea otter. Once nearly hunted to extinction, the sea otter population is making a comeback within the protected waters of the sanctuary. The sanctuary provides habitat for 34 species of marine mammals, 180 species of seabirds and shorebirds, at least 525 species of fish, 4 species of turtles, 31 phyla of invertebrates, and more than 450 species of marine algae. It has been called the "Serengeti of the Sea" based upon its remarkable productivity. Included within the boundaries of this sanctuary is the Monterey Canyon, an area twice as deep and one-third the length of the Grand Canyon. The proximity of this canyon to shore provides unparalleled opportunities to advance our knowledge of deep sea ecosystems. In addition to the incredible biodiversity, the sanctuary contains historical sites including 1,276 reported shipwrecks and 718 prehistoric sites.

The Channel Islands National Marine Sanctuary:

To the south of our area, the Channel Islands National Marine Sanctuary is home to an extremely rich and diverse array of marine species, making it one of the best places in the world for viewing whales and other wildlife. Over twenty-seven species of whales and dolphins are regular visitors to the waters of the sanctuary including the federally listed blue, humpback and Sei whales. The sanctuary supports an incredible diversity of algae. The Final Management

Plan/Final Environmental Impact Statement for the Channel Island sanctuary states the sanctuary may support in excess of 5,000 species of invertebrates due to the transitional location between warm and cold bioregions. The sanctuary supports hundreds of species of fish and over 195 species of birds. According to the document, the “Sanctuary region provides important habitat for eight seabirds with special status under federal or state law: Ashy Storm-petrel, Black Storm-petrel, California Brown Pelican, California Least Tern, Double-crested Cormorant, Rhinoceros Auklet, Western Snowy Plover and Xantus’s Murrelet.” The sanctuary also provides protection to more than 150 historic shipwrecks and is a place of important cultural significance for the Chumash people.

Papahānaumokuākea Marine National Monument:

The Papahānaumokuākea Marine National Monument became the first mixed UNESCO World Heritage Site in the United States in July of 2010. The UNESCO website states, “The area has deep cosmological and traditional significance for living Native Hawaiian culture, as an ancestral environment, as an embodiment of the Hawaiian concept of kinship between people and the natural world, and as the place where it is believed that life originates and to where spirits return after death.” The UNESCO webpage goes on to state, “The geomorphological history and isolation of the archipelago have led to the development of an extraordinary range of habitats and features, *including an extremely high degree of endemism... The area is host to numerous endangered or threatened species, both terrestrial and marine, some of which depend solely on Papahānaumokuākea.*” [emphasis added] According to the PEW Charitable Trust, “One of the largest groupings of tropical seabirds in the world makes its home in the Northwestern Hawaiian Islands. That includes 14 million birds from 22 species, 5.5 million of which breed in the areas annually. Eleven are considered imperiled or of high conservation concern...more than 98 percent of the world’s Laysan Albatrosses nest on the Northwestern Hawaiian Islands chain.” [<http://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2016/05/papahanaumokuakea-marine-national-monument>] The extensive coral reefs of the monument support over 7,000 marine species including the critically endangered Hawaiian Monk Seal, the Laysan Duck, Laysan Finch, Nihoa Finch, Nihoa Millerbird (all endemic), six endangered plant species, and the green sea turtle.

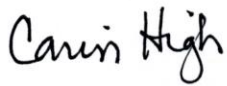
The designation of these marine sanctuaries and monuments were well vetted processes. The determination of boundaries and necessary protections were processes carried out using sound and transparent peer-reviewed science supported by robust public input through open citizen review and public hearings, and these processes were duly undertaken in compliance with all relevant federal and state laws and regulatory frameworks.

Reducing the size or existing protections for any of the national marine sanctuaries and monuments would not be in the public interest. As stated earlier, these sanctuaries and monuments were designated because they are national treasures that warrant permanent protection. They are recognized world-wide as biodiversity hotspots. Exploitation of these areas

for oil, minerals, or fisheries would have far-reaching and significantly irreversible and damaging impacts.

We urge all reviewing agencies to carefully consider the broad non-partisan public support that led to these sanctuary and monument designations in reaching the ultimate conclusion that it is not in the public interest (as opposed the interests of those who wish to profit through exploitation of these areas), to diminish the areal extent or the existing levels of protection for any of the eleven National Marine Sanctuaries or Monuments.

Sincerely,



Carin High



Gail Raabe

Co-chairs, Citizens Committee to Complete the Refuge