

# Exhibit A

**Exhibit A: The following is a proposed means of addressing the issue before NOAA, and not a final analysis. It is suggested that it be circulated in conjunction with a Notice of Further Rulemaking.**

<p align="center"><b>PEER CATEGORIZATION OF NATIONAL MARINE SANCTUARY (“NMS”) ATTRIBUTES</b></p>					
SANCTUARY	MARINE WILDLIFE CONCERNS	GEOLOGIC CONCERNS	MISCELLANEOUS CONCERNS	COMMENTS	CATEGORY
<p><b>Channel Islands</b> (Santa Barbara, CA)</p>	<ul style="list-style-type: none"> <li>- unique currents provide breeding ground</li> <li>- 27 species of whales and dolphins annually, including rare blue, sei, and humpback whales</li> <li>- birds living on local islands depend on marine life for food</li> </ul>	<p>Unknown</p>	<p>threatened by...</p> <ul style="list-style-type: none"> <li>- oil and gas development threatens the sanctuary</li> <li>- busy shipping lanes nearby</li> <li>- non-point source pollution</li> <li>- fishing</li> </ul>	<p>Sanctuary already violated by human presence and impact.</p>	<p>No Cable</p>
<p><b>Cordell Bank</b> (Northern CA) 526 square miles</p>	<ul style="list-style-type: none"> <li>- lush feeding ground for marine mammals and seabirds</li> <li>- home to Dall’s porpoises, albatross, shearwaters, and endangered humpback whales</li> </ul>	<ul style="list-style-type: none"> <li>- located at the edge of the continental shelf</li> <li>- topography contributes significantly to the biological activity</li> </ul>	<ul style="list-style-type: none"> <li>- not frequently visited due to location and depth</li> </ul>	<p>Proposed cables must be subject to a resource/species-specific, publicly-noticed EIS.</p>	<p>Some Cable</p>

SANCTUARY	MARINE WILDLIFE CONCERNS	GEOLOGIC CONCERNS	MISCELLANEOUS CONCERNS	COMMENTS	CATEGORY
<b>Fagatele Bay</b> (Tutuila, American Samoa) .25 square miles	threatened or endangered species: <ul style="list-style-type: none"> <li>- humpback whale</li> <li>- sperm whale</li> <li>- hawksbill turtle</li> <li>- green sea turtle</li> </ul>	<ul style="list-style-type: none"> <li>- only true tropical coral reef in the NMS program</li> </ul>	<ul style="list-style-type: none"> <li>- slopes surrounding the sanctuary include rare paleo-tropical rainforest</li> <li>- threatened by poaching and upstream sewage flow</li> </ul>	None.	No Cable
<b>Florida Keys</b>	<ul style="list-style-type: none"> <li>- marine life contributes to the fishing and tourism industries</li> </ul>	<ul style="list-style-type: none"> <li>- many existing threats to the health of the coral reef</li> </ul>	many types of habitat: <ul style="list-style-type: none"> <li>- hardbottom</li> <li>- softbottom</li> <li>- sand</li> <li>- seagrass</li> <li>- coral reef</li> </ul>	Sanctuary already violated by human presence and impact.	No Cable
<b>Flower Garden Banks</b> (110 miles off coasts of TX and LA)	<ul style="list-style-type: none"> <li>- coral reef habitat: dense school of tropical fish, manta rays, turtles, sharks</li> <li>- serves as reservoir of shallow water for Caribbean reef wildlife</li> </ul>	<ul style="list-style-type: none"> <li>- harbors the northernmost coral reefs in the U.S.</li> <li>- contains ancient drowned reefs, natural gas seeps, and a brine lake</li> <li>- the 3<sup>rd</sup> bank (Stetson Bank) is capped by eroded sandstone and claystone that provide habitat</li> </ul>	<ul style="list-style-type: none"> <li>- used frequently for recreational divers and scientific research</li> </ul>	None.	No Cable

SANCTUARY	MARINE WILDLIFE CONCERNS	GEOLOGIC CONCERNS	MISCELLANEOUS CONCERNS	COMMENTS	CATEGORY
<b>Gray's Reef</b> (near Sapelo Island, GA) 17 square miles	<ul style="list-style-type: none"> <li>- provides unique reef habitat for marine life</li> </ul>	<ul style="list-style-type: none"> <li>- one of the largest nearshore sandstone reefs in the southeastern US</li> </ul>	<ul style="list-style-type: none"> <li>- the ecosystem includes a solid base which allows species to attach and grow to the floor (a "live bottom habitat")</li> <li>- used frequently for recreational fishing and diving</li> </ul>	None	No Cable
<b>Gulf of the Farallones</b> (near San Francisco, CA) 1,255 square miles	<ul style="list-style-type: none"> <li>- provides resting and breeding sites for birds and marine mammals</li> <li>- home to largest concentration of breeding seabirds in the continental US</li> </ul>	Unknown	<ul style="list-style-type: none"> <li>- partially designated as national wildlife refuge</li> <li>- significant amount of public recreation land along shoreline</li> <li>- threatened by oil spills, sewage, chemicals, petroleum products, pesticides, and urban runoff</li> </ul>	Proposed cables must be subject to a resource/species-specific, publicly-noticed EIS.	Some Cable
<b>Hawaiian Islands Humpback Whale</b>	<ul style="list-style-type: none"> <li>- only place in US where humpbacks reproduce (two-thirds of entire N. Pacific humpback population; 4000-5000 whales)</li> <li>- breed, calve and nurse young here</li> </ul>	Unknown	<ul style="list-style-type: none"> <li>- Public was assured that the sanctuary would primarily deal with restrictions on approaching and harassing whales, discharging waste into the water, and <b>alteration of the seabed</b></li> </ul>	None	No Cable

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<b>Monitor</b> Located 16 miles off coast of NC (one mile in diameter circle above wreck)	Unknown	Monitor rests on a sand-covered seafloor	Further deterioration of the wreck, recovery of artifacts and <b>protecting the wreck from damage by human activities</b> are top concerns	This is both a marine and national sanctuary; commercial use would be both sacrilegious and an offense to veterans.	No Cable
<b>Monterey Bay</b> 5300 sq miles off coast of central CA	<ul style="list-style-type: none"> <li>- Elephant seals</li> <li>- Migratory marine life</li> <li>- bountiful resident marine life</li> </ul>	Unknown	Resource management issues include: <ul style="list-style-type: none"> <li>- vessel traffic and impact on marine life and water quality</li> <li>- disposal of dredge material</li> <li>- land-based sources of water pollution</li> <li>- direct and indirect impacts of fishing</li> <li>- impacts of non-native invasive species</li> </ul>	Proposed cables must be subject to a resource/species-specific, publicly-noticed EIS.	Some Cable
<b>Olympic Coast</b> Extends 35 miles offshore of WA and along 135 miles of coast	<ul style="list-style-type: none"> <li>- habitat for one of most diverse marine mammal faunas in N. America</li> <li>- critical link in Pacific flyway</li> </ul>	Unknown	<ul style="list-style-type: none"> <li>- undeveloped shoreline</li> <li>- adjacent to wilderness beaches and Native American reservations</li> <li>- islands and rocks above high tide also protected in National Wildlife Refuge</li> <li>- Resource management issues include:               <ul style="list-style-type: none"> <li>-- vessel traffic</li> <li>-- spill prevention and response</li> <li>-- ecological impact of fishing</li> </ul> </li> </ul>	None.	No Cable

SANCTUARY	MARINE WILDLIFE CONCERNS	GEOLOGIC CONCERNS	MISCELLANEOUS CONCERNS	COMMENTS	CATEGORY
<b>Stellwagen Bank</b> At mouth of Boston Bay, MA	<ul style="list-style-type: none"> <li>- critical nutrient area for phytoplankton which in turn feeds small animals (zooplankton)</li> <li>- zooplankton support a multi-layered food web that culminates with whales</li> <li>- huge fish population</li> <li>- migration and feeding area for endangered northern right whale and humpback whale</li> </ul>	<ul style="list-style-type: none"> <li>- gravel and sand bank</li> <li>- nutrient-rich waters from basin rise over bank supporting critical marine life</li> </ul>	Resource Management issues: <ul style="list-style-type: none"> <li>- commercial fishing</li> <li>- whale watching</li> <li>- pollutants from heavily developed coast</li> <li>- potential for offshore mineral and gravel mining</li> <li>- disposal of dredged materials</li> <li>- vessel traffic in endangered whale migration and feeding area</li> <li>- <b>decline in fish stock and destruction of their habitats</b></li> </ul>	None.	No Cable
<b>Thunder Bay</b> In Great Lakes	<ul style="list-style-type: none"> <li>- fresh water habitat</li> </ul>	<ul style="list-style-type: none"> <li>- Great Lakes area</li> </ul>	<ul style="list-style-type: none"> <li>- 160 shipwrecks are located here</li> </ul>	This is both a marine and national sanctuary; use of this site for commercial purposes would be sacrilegious.	No Cable