



June 30, 2014

Surfrider Foundation
PO Box 6010
San Clemente, CA
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Ms. Maria Brown
Sanctuary Superintendent
Gulf of the Farallones National Marine Sanctuary
991 Marine Drive, The Presidio
San Francisco, CA 94129

Dear Ms. Brown,

The Surfrider Foundation is a grassroots environmental organization dedicated to the protection and enjoyment of oceans, waves, and beaches. We appreciate the opportunity to submit comments on the Draft Environmental Impact Statement for the northern expansion of the Cordell Bank and Gulf of the Farallones National Marine Sanctuaries (DEIS) and the proposed new management regulations for both sanctuaries.

The Surfrider Foundation strongly supports the proposal to extend the boundaries of the two sanctuaries to add the northern area from Bodega Bay, Sonoma County to Alder Creek, Mendocino County, and west to the edge of the continental shelf.

The Surfrider Foundation has been actively working with a myriad of stakeholders to establish marine protected areas in state waters and we believe the expansion of this sanctuary complements the hard work of many Californians to protect special, biologically rich places and ecosystems. The proposed sanctuary expansion will provide crucial protection from offshore oil and gas development for the marine ecosystem and adjacent coastal communities. The area of expansion is one of the most ecologically significant in the world and contains a diverse assemblage of marine life and habitats, as well as a major upwelling zone that provides critical nutrients for the existing sanctuaries to the south. These outstanding natural resources must be protected from the risky and environmentally damaging practice of offshore drilling.

Expanding the Gulf of the Farallones and Cordell Bank Sanctuaries will also enhance marine science and education opportunities, and help protect vital socioeconomic benefits that result from a healthy and productive marine ecosystem. The coastline of interest is used by thousands of Surfrider members and supporters for a variety of activities including surfing, diving, kayaking, beachcombing, fishing, and aesthetic enjoyment. Moreover, these recreation and tourism opportunities support many local businesses such as motels, restaurants, and shops that depend directly on the health and beauty of coastal environment. Expanding the sanctuary boundaries north to Alder Creek will help ensure these uses and values are protected for generations to come.

A key area of concern for Surfrider within the NOAA proposal is a provision to add authority for the sanctuary to approve certain activities that are otherwise prohibited, as long as those activities are permitted or licensed by another federal, state, or local agency. We believe this “authorization” provision would provide the superintendent with unnecessary authority, and could result in the approval of commercial projects or other development without appropriate public and environmental review. Such exemptions are contrary to the purpose and spirit of a sanctuary designation and should not be included as part of the final rule.

Finally, the Surfrider Foundation would like to note that our local chapters and members in the region may also (or have already) submit comments on the DEIS. In some cases, these comments will address specific rules and access issues under consideration as part of the expanded sanctuary boundaries supported by Surfrider. As a grassroots organization, we encourage the active participation of our local chapters and members in this important public process. We believe that the sanctuary management plan must be developed thoughtfully and in close consultation with affected communities and stakeholders.

Sincerely,

Pete Stauffer
Ocean Program Manager

Stefanie Sekich-Quinn
California Policy Manager