
Issue 1: Sanctuary Boundary

Comment

Boundary Alternatives/Extensions

NOAA should extend its preferred Boundary Alternative because a northern extension (Alternative 4) would: 1) protect the critical bird nesting and migratory paths between Monterey County and the San Mateo coast; 2) create a continuous interrelated zone offshore between Monterey Bay and the Gulf of the Farallones National Marine Sanctuary (GNMS); 3) restrict or prohibit industrial activity that threatens the Sanctuary, particularly oil and gas activities; 4) provide a sufficient buffer for the Año Nuevo State Reserve from threats such as hydrocarbon development and vessel traffic; and 5) provide additional protection to the Fitzgerald Marine Reserve, which protects a diverse intertidal invertebrate community.

NOAA Response

Boundary Alternatives/Extensions

NOAA agrees and has incorporated a north and south extension of the DEIS/MP - preferred Boundary Alternative 2. Boundary Alternative 5 with the modification described below has now been chosen as preferred because it integrates important coastal, nearshore, and deep-ocean canyon resource zones under one management regime. These zones include Monterey Bay; the Big Sur and San Mateo coastal area; Año Nuevo Point; the adjacent continental shelf, slope, and rise; certain highly productive shoreline and intertidal areas such as Pescadero Marsh and Elkhorn Slough; and the deep ocean environments of the Ascension, Monterey Bay, Big Sur, and Partington Canyon complexes. The Monterey submarine canyon continues to be the focal point of the Sanctuary.

The boundary expansion not only encompasses additional resources but also will provide enhanced protection from potential human threats to the north and south. For example, to the north off the San Mateo coast, potential new dredged material disposal and oil and gas development activities are under consideration. To the south, the pristine area of the Big Sur coastline and sea otter habitat would be encompassed and protected by the Sanctuary regime for its long-term ecological benefit.

The boundary expansion excludes a small area of approximately 71 square nautical miles off the north coast of San Mateo between Point San Pedro and Point Bonita and the City and County of San Francisco. The excluded area encompasses the anticipated discharge plume of the combined sewer overflow component of the City and County of San Francisco's sewage treatment program, the shipping channel providing access to and from San Francisco Bay, and the Golden Gate dredged material disposal site associated with this channel. NOAA has determined that the nature and level of these activities are not appropriate for inclusion within a national marine sanctuary. By excluding this small area from the Sanctuary, NOAA will be able to focus Sanctuary management on the long-term protection of other areas that contain nationally significant resources and qualities and are less heavily impacted by

Comment

NOAA Response

A southern extension (Boundary Alternative 3) would: 1) provide additional protection to the extensive kelp beds found in the region; 2) encompass more than three-quarters of the sea otter range; and 3) preserve an undeveloped and significant natural area before it is adversely affected by human impact.

human activity. By excluding the anticipated discharge plume of the combined sewer overflow from the Sanctuary, a buffer zone has been created protecting Sanctuary resources and qualities from the discharge.

NOAA agrees and has incorporated a north and south extension of the DEIS/MP - preferred Boundary Alternative 2. A modified Boundary Alternative 5 has been chosen as preferred. See the response to the first comment above.

An extension both north and south (Alternative 5) would provide full protection for the reasons stated above.

See above response..

The DEIS/MP does not provide adequate analysis for each boundary alternative. The evidence NOAA presents does not adequately support its preference for Alternative 2. The DEIS/MP states that Boundary Alternative 5 is unwieldy from a management perspective and too costly for adequate enforcement measures. This statement needs to be supported. Based on relative costs and benefits, boundary alternative analyses should examine the possibility of not including certain areas within the Sanctuary.

The FEIS/MP has been substantially revised to present an analysis of all boundary alternatives from the perspective of potential resources encompassed and human activities affected.

Central Coast Sanctuary Proposal

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A nomination package should be prepared for a Central Coast National Marine Sanctuary, from Big Sur south to Santa Barbara County. Boundary Alternative 4 should be chosen for the Monterey Sanctuary, so a separate southern sanctuary can be justified in the future.

A nomination package has been submitted to NOAA that includes Morro Bay and the central California coast below the southern extent of Boundary Alternative 5. In addition, Morro Bay is included in NOAA's Site Evaluation List (SEL) and is eligible for future consideration for active candidate status as a national marine sanctuary. The SEL presently is under review, which may include the addition of new potential sites and a priority ranking of candidate sites. Consideration of the central coast nomination package has been deferred pending completion of the SEL review and the establishment of the MBNMS.

Comment

Definition of the Term "Buffer"

NOAA should clarify the term "buffer" and discuss its relationship to the preferred boundary, sensitive Sanctuary resources within and outside the boundary, and regulatory authority. If a resource is important enough to be included in such a zone, it is important enough to be within the Sanctuary itself.

OCS Activity Buffer Zone

A 30-mile contiguous buffer zone around the Sanctuary boundary should be created where oil and gas exploration and development activities would be prohibited to ensure protection of marine resources. This zone should have enforceable regulations to prohibit outer continental shelf (OCS) related activities.

NOAA Response

Definition of the Term "Buffer"

The term "buffer" has been clarified in the FEIS/MP. The preferred Sanctuary boundary is designed to encompass sensitive resources and to incorporate areas within its boundary (buffers) where potentially harmful human activities would be under Sanctuary jurisdiction. In addition, the Sanctuary prohibition on discharging or depositing, from beyond the boundary of the Sanctuary, any material that will enter the Sanctuary and injure a sanctuary resource or quality provides added protection.

OCS Activity Buffer Zone

NOAA proposed an MOA with the Minerals Management Service (MMS) to enhance coordination between both agencies during any future exploration, production, and development activities to minimize the threats of oil and gas development to Sanctuary resources and qualities. However, MMS recommended the decision to adopt any such MOA be deferred until after the year 2000. (In 1990, President Bush said that no oil and gas development will occur in the Central California Planning Area until after the year 2000 when the analysis of environmental studies conducted in the area will be completed.)

In the interim, NOAA and MMS will continue to explore ways that existing regulatory authorities, relationships, and coordinating mechanisms can be strengthened and enhanced to work more effectively. The selection of a larger preferred boundary alternative has reduced the necessity of a buffer zone of the size recommended in the comment.