

Maria Brown,
Sanctuary Superintendent,
Gulf of the Farallones
National Marine Sanctuary,
991 Marine Drive, The Presidio,
San Francisco, CA 94129.



Esteemed Maria Brown:

Regarding:

NOAA–NOS–2012–0228, 15

**Boundary Expansion of Cordell Bank and Gulf of the Farallones
National Marine Sanctuaries**

Over the last few years, the National Marine Sanctuary Program has focused its efforts to highlight the critical role of sanctuaries in promoting strong local economies and conserving resources for future generations. Sanctuaries believe they are relevant and connected to the communities to which they are bound. We agree they are, but only when a community evaluates for themselves, the advantages and disadvantages of becoming a sanctuary site. Without the proper community process, sanctuary expansion seems like one group forcing their ideas and regulations upon others.

The Sanctuary Program has an approved process for selecting and evaluating new sites. This process starts with activating the site evaluation list. It involves establishing an Advisory Council whose membership is made up of local community interests. These stakeholders represent the community, local, state and federal government, as well as other regulatory agencies. The importance of the Advisory Council and its membership cannot be understated; it is the cornerstone of creating strong local community support. These Advisory Councils by Charter are to be balanced, representing differing viewpoints. The process of site evaluation also provides an economic impact analysis not only to the new area, but also to the sanctuary program so as not to cause economic stress to an already fragile budget, thereby reducing effectiveness or eliminating programs.

The current process of Sanctuary Site Expansion for both the Cordell Banks and the Farallon Islands is far from having strong community support. We would like to point out that the current charters for both Advisory Councils as well as their members do not represent the majority of the area to which they are proposing expansion. Specifically missing are seats representing Native Americans and Recreational Fishing and Diving. Access to traditional sites for harvesting seafood from shore and while freediving is critical to the locals and the economy of this area. The membership of the current councils of both sites is not balanced, and far from representing the spectrum of viewpoints.

Divers have a unique and special bond with the marine environment; just take a moment to talk to one about diving. Several years ago having been blindsided by regulations and

outside interests The Watermen's Alliance was formed. Our goal was to unify the individual stewardship efforts of many and form a voice so we could be heard. We silently (as divers do) reached out to thousands of divers, we listened; we're educating, informing and positioning ourselves to respond. Learn more about us at www.watermensalliance.com

The Watermen's Alliance opposes the expansion of the Cordell Banks and Farallon Islands Sanctuaries. We ask that the site expansion list be reactivated before further consideration is given to expanding any sanctuary.

Thank you very much for your consideration

Sincerely,



Josh Russo
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Watermen's Alliance
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