

ENFORCEMENT CONSULTANTS REPORT ON GULF OF THE FARALLONES AND  
CORDELL BANK NATIONAL MARINE SANCTUARY BOUNDARY EXPANSION

The Enforcement Consultants (EC) has reviewed the documents pertaining to Agenda Item C.2, Gulf of the Farallones and Cordell Bank National Marine Sanctuary (NMS) Boundary Expansion, and has the following comments.

Regarding Discharge Regulations (other than from a cruise ship), The EC has serious concerns that the regulation as proposed will impair our ability to conduct continuous underway operations. This will have a direct impact on our ability to effectively enforce fishery regulations, as well as regulations that pertain to the sanctuary. This is primarily due to the costs and complexity of vessel modifications, to increase holding tank capabilities or chemical treatment, as required. California Department of Fish and Wildlife and U.S. Coast Guard are in initial discussion with Sanctuary staff to find a mutually agreed upon solution.

PFMC  
06/24/14