



May 19, 2015

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

Dear Superintendent Brown,

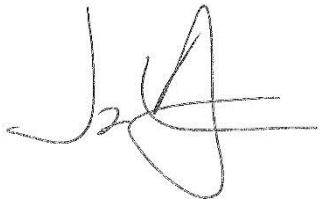
I am writing to express the full support of Point Blue Conservation Science (Point Blue) for NOAA's request to voluntarily limit the speed of commercial vessels (300 tons or larger) to 10 knots when transiting within the San Francisco Traffic Separation Scheme (TSS) in the Cordell Bank, Gulf of the Farallones, and Monterey Bay National Marine Sanctuaries between May 1 and November 15, 2015.

In 2013-2014, ACCESS and Whale Alert/Spotter data were used to inform decision-making by updating NOAA managers of whale presence in the Sanctuaries. NOAA and the US Coast Guard (USCG) used this information to give notice to mariners to use caution when transiting San Francisco Bay lanes by reducing vessel speed through areas of known whale presence or using alternate route. Gaining accurate data on where the whales are (and are not) and timely delivery of outgoing notices to mariners by the NOAA and the USCG is challenging. Subsequently, implementing a DMA is difficult when little is known about whale presence in the suggested alternative-use areas. Other marine protected regions (e.g. Stellwagen Bank National Marine Sanctuary) have successfully implemented seasonal management plans to protect whales. Implementing seasonal restrictions on vessel speed and route usage to avoid whale "hotspots" will ensure protection of areas and whales during months when those animals are in greater abundances within the Sanctuaries' waters. Identifying these "hotspots" involves not only knowing where whales are, but also exploring the prey that attracts whales to certain locations at certain periods.

Point Blue is currently working to increase participation in the Whale Alert – West Coast sighting network and is in the process of adding new means by which participants can contribute data using other apps such as Whale mAPP (University of the Redlands), iNaturalist (CalAcademy), among others. The network will continue to help us educate and engage citizen scientists (nature lovers, industry, fishers, and mariners) in helping to reduce ship strikes to whales. The role of this new data will be crucial in adjusting the timing and duration of future SMA.

Thank you for your consideration of our comments. Please let us know if you have any further questions by contacting Dr. Jaime Jahncke at jjahncke@pointblue.org or 707-781-2555, ext. 335

Sincerely,

A handwritten signature in black ink, appearing to read "Jaime Jahncke".

Jaime Jahncke, Ph.D.
California Current Director

cc:

Dan Howard, Superintendent, Cordell Bank National Marine Sanctuary