

## **Advisory Council Members**

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#### **At-Large Marin/Sonoma**

Dominique Richard/George Clyde

#### **At-Large Sonoma/Mendocino**

Cea Higgins/Nancy Trissel

#### **California Resources Agency**

Deborah Halberstadt/Chris Potter

#### **Conservation**

Richard Charter/Francesca Koe

#### **Conservation**

Bruce Bowser

#### **Education**

Elizabeth Babcock/Bibit Traut

#### **Maritime Activities/Commercial**

Barbara Emley/John Berge

#### **Maritime Activities/Recreational**

Abby Mohan/Joshua Russo

#### **National Park Service**

Cicely Muldoon/Ben Becker

#### **Research**

John Largier/Jaime Jahncke

#### **United States Coast Guard**

LCDR Jason Brand/LT Darrina Willis

#### **US Fish and Wildlife Service**

Chris Barr/Gerry McChesney

#### **Youth**

Sandra Chu/Summer Alinaeem

### **National Marine Sanctuary Reps**

#### **Channel Islands**

Chris Mobley/Mike Murray

#### **Cordell Bank**

Dan Howard/Michael Carver

#### **Monterey Bay**

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Dominique Richard

#### **Vice Chair**

Abby Mohan

#### **Secretary**

Barbara Emley

# **Sanctuary Advisory Council**

## **GREATER FARALLONES NATIONAL MARINE SANCTUARY**

### **Resolution to Write a Letter Requesting Information for Plans for Mitigating Environmental Impacts from the Sonoma Coast Marathon**

March 25, 2019

At its meeting on February 27, 2019, the Greater Farallones Sanctuary Advisory Council recommended that the Greater Farallones National Marine Sanctuary write a letter to Sonoma Coast Marathon organizers and permittees requesting information about plans for mitigating potential environmental impacts, including marine debris and disturbance to wildlife by low-flying aircrafts affiliated with the event. The Sanctuary sent the following letter:

*The council is an advisory body to the sanctuary superintendent. The opinions and findings of this letter/publication do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration.*



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL OCEAN SERVICE**

**Greater Farallones National Marine Sanctuary**  
991 Marine Dr., The Presidio  
San Francisco, CA 94129

March 18, 2019

Efron Carillo  
Sonoma Coast Marathon LLC  
[ecarrillo@sonomacoastmarathon.com](mailto:ecarrillo@sonomacoastmarathon.com)

**Sent Via Email**

RE: Sonoma Coast Marathon

Dear Mr. Carillo:

The Greater Farallones National Marine Sanctuary Advisory Council (Advisory Council) has requested the Greater Farallones National Marine Sanctuary (GFNMS) contact the Sonoma Coast Marathon, LLC regarding a road racing event, the Sonoma Coast Marathon (<https://sonomacoastmarathon.com>), along Highway 1 between Fort Ross and Bodega Bay on September 29, 2019.

Thanks in part to your efforts, GFNMS manages the waters and submerged lands along the entire coast of Sonoma County. GFNMS, which was designated in 1981 and expanded in 2015, has a mission to protect the wildlife, habitats, and cultural resources of one of the most diverse and bountiful marine environments in the world, an area of 3,295 square miles off the northern and central California coast. The waters within GFNMS are a nationally significant marine ecosystem, and support an abundance of life, including many threatened and endangered species (<https://farallones.noaa.gov>). The Advisory Council requested that we share GFNMS regulations that may pertain to the Sonoma Coast Marathon and request a copy of the Marathon's environmental compliance and operations plan.

Discharging or depositing, from beyond the boundary of the Sanctuary (i.e. above the Mean High Water line), any material or other matter that subsequently enters the Sanctuary and injures a Sanctuary resource or quality is prohibited [15 CFR Part 922, § 922.82 (a)]. The National Marine Sanctuaries Act defines "injure" as "to change adversely, either in the short or long term, a chemical, biological or physical attribute of, or the viability of." This prohibition would apply to any activities conducted beyond the Sanctuary, in which matter could be discharged and ultimately enter the Sanctuary and cause injury, even in the short term.

Since the proposed event would be held along a stretch of highway bordering the sanctuary and in an area with frequent windy conditions, Sanctuary Advisory Council members expressed concern about the potential for large amounts of waste generated by the road race to ultimately end up in the sanctuary. The Big Sur Marathon has done an excellent job ensuring no materials generated by their road race enter the Monterey Bay National Marine Sanctuary as marine

debris. Please send a copy of your waste management plan to GFNMS permitting staff at your earliest convenience. The plan can be sent to:

Max Delaney  
GFNMS Permit Coordinator  
991 Marine Drive  
San Francisco, CA 94129  
[max.delaney@noaa.gov](mailto:max.delaney@noaa.gov)

In addition, GFNMS has regulations prohibiting the operation of low flying aircraft (i.e. below 1,000 feet above ground level (AGL) in certain areas within the sanctuary regulations [15 CFR Part 922, § 922.82 (a)(11)]. There is a NOAA Regulated Overflight Zone located along the proposed course route. This zone extends from Windemere Point to Duncan's Point (See inset map 5 at [https://nmsfarallones.blob.core.windows.net/farallones-prod/media/maps/master\\_regulatory\\_zones.pdf](https://nmsfarallones.blob.core.windows.net/farallones-prod/media/maps/master_regulatory_zones.pdf)).

More information on the GFNMS regulations and permitting process can be found here: <https://farallones.noaa.gov/manage/regulations.html>.

The sanctuary welcomes the opportunity to work with the Sonoma Coast Marathon organizers on an event that takes advantage of the scenic beauty of the Sonoma Coast and sanctuary while stewarding this national treasure. For more information about sanctuary regulations, permits, and to work together, please contact Max Delaney at [max.delaney@noaa.gov](mailto:max.delaney@noaa.gov) or 415-970-5255.

Sincerely,



Maria Brown  
Sanctuary Superintendent

cc.

California Department of Transportation  
California Highway Patrol  
Sonoma County Permit & Resources Management Department  
California State Parks