



Gordon College, Wenham, MA 9 June 08

Nahant SWIM, Inc.

Safer Waters in Massachusetts

June 9, 2008

DMP Public Meeting

Mr. Craig McDonald, Sanctuary Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Mr. McDonald:

I represent Safer Waters in Massachusetts (Nahant SWIM), a volunteer citizens group that since 1984 has been working to protect Boston Harbor and Massachusetts Bay.

All of us here tonight agree on the goals: sustainable fisheries, a vibrant fishing community, protection of endangered species.

As I see it, the major problem facing the people who care about Stellwagen Bank is: How can we protect the ecosystem on which the fisheries depend and at the same time keep the New England fisheries alive right now? I lean towards taking a long-term view, wanting the draft management plan to work to return the ecosystem to maximum health so the fishermen have the resources they need to feed their families and the rest of us.

It is easy for me to take a long-term view: my family's livelihood does not depend on fishing.

But I have children, "hostages to fortune," as Sir Francis Bacon said 400 years ago: I want my grandchildren, and everyone's grandchildren 400 years from now, to live in a healthy environment, to enjoy seafood, and to marvel at the great whales.

This is not a dilemma unique to Stellwagen Bank. We face it all over the world, in the oceans and also on land, where setting aside a sanctuary to protect wildlife often conflicts with the needs of people who live nearby, people who are often are desperately poor.

But we don't have to solve this problem all over the world. We have to solve it here and now, on Stellwagen Bank. SWIM sees a polarization which serves no one well. I ask that all work together, fishermen, environmentalists, and government officials, to protect ecosystem diversity and endangered species.

SWIM is asking for a two-month extension on the deadline for comments on this management plan, which we have not had time to study in detail. We intend to give a more complete response to supplement this initial testimony.

Thank you for the opportunity to testify.

Sincerely yours,

*Polly Bradley*

Polly Bradley, Secretary  
Nahant SWIM

Safer Waters in Massachusetts (Nahant SWIM, Inc.), c/o Northeastern University Marine Science Center  
East Point, Nahant, MA 01908 - 781-581-0075 - email: nahantswim@verizon.net  
web page: [www.nahant.org/community/swim.shtml](http://www.nahant.org/community/swim.shtml)

Since 1984, SWIM has worked to protect the ocean around Nahant and beyond.

Gordon College - Wenham, MA  
9 June 08  
DMP Public Mtg

June 9, 2008

Dr. Craig MacDonald  
Sanctuary Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Rd.  
Scituate, MA 02066

To Dr. MacDonald:

Thank you for the opportunity to present my and my husband's comments at this public hearing in Wenham, Massachusetts. We appreciate the time and effort taken to develop a management plan for the Stellwagen Bank National Marine Sanctuary.

Our intention in writing these comments is to ensure that when we go diving we will have something to look at other than rocks and sand. Our comments are intended to insure we will be able to dive to new locations and view both fish and wrecks. We are concerned that your plan, as presented, restricts our ability to do either.

Your plan describes in detail the destruction caused by our current commercial fishing industry. You mention the 96% depletion of cod fish. You note the abhorrent practice of by-catch and the unbelievable estimate that 25% of what is caught is thrown out as useless. You describe how bottom trawlers irreparably destroy the ocean floor. And yet, you call for no action beyond study!

For example, EA3 implies an action plan that would reduce by-catch. However, none of your strategies actually reduce by-catch, they all call for cooperation, coordination and research. Strategy 3.2 even seeks to determine the effects of such high amounts of by-catch. We can tell you as non-scientists, it cannot be good! Study done, lets stop this immoral practice!

When occasionally you do propose to eliminate a destructive commercial fishing practice such as modification to bottom pots and modifications to gill nets, you budget no funding to implement these actions. We are sorry, but this seems to be at best incongruent and at worst intentionally deceptive.

If your mission is to preserve the biodiversity of Stellwagen Bank National Marine Sanctuary, then we propose that you pursue the following actions. We have presented them with the understanding that if you in fact implemented the first, all others would be irrelevant:

1. Develop action plans that will result in the banning of commercial fishing from the Stellwagen Bank National Marine Sanctuary instead of plans that will study the impact of fishing on the banks. This has successfully been done in New Zealand with very positive environmental results. It is acknowledged in your own document as the single action sufficient to protect the integrity of the system.
2. Develop action plans that will result in the banning of bottom trawling in the Stellwagen Bank National Marine Sanctuary instead of plans that will study the impact of bottom trawling. Your report states "bottom mobile gears (scallop

dredges and groundfish otter trawls) commonly fished in the SBNMS impose the greatest anthropogenic impact on benthic habitats." *If this has the greatest negative impact, then banning it should have the greatest positive impact.*

3. Develop action plans that will result in the banning or reduction of by-catch from the Stellwagen Bank National Marine Sanctuary instead of plans that will study the impact of by-catch on the banks.

4. Fund your action plan related to gill net modifications.

5. Fund your action plan related to trap/pot fisheries.

In contrast to your action plans regarding fish, your action plans regarding wrecks seem to be too restrictive when it comes to public access to areas of historic interest.

1. We support your plan to establish a Maritime Heritage Program (MH1).

2. As presented, we oppose the description of your plans to categorize historical resources in section (MH2) as they fail to indicate why (beyond statutory regulation) sites must be added to the National Registry of Historic Places and what such listing implies.

3. We strongly object to MH3 for several reasons:

a. In the background section, you indicate that access will be by permit only for (archaeological) research. It is not clear at all if there will be any permit for recreational divers to access "restricted" sites in this draft management plan, and what that plan would entail. And, under this draft management plan, it appears the commercial fisheries are free to use (and destroy) the sanctuary with no permit involved. This seems to unfairly restrict those who wish to use the resources of the sanctuary for NON commercial activities, including diving. If the sanctuary is so fragile that it is felt there is a need to exclude diving, then doesn't the need to protect it from the destructive nature of commercial fishing and bottom trawling also apply?

b. You distinguish between historic sites and heritage preserves with no classification of non historic, non heritage sites. One approach would be to develop a non-historical category. Then apply the standard that an item MUST meet the National Registry of Historical Places criteria for the historical category.

c. Within the historical category, if public access is to be restricted to facilitate heritage resource protection, then all bottom trawling in these areas MUST be strictly prohibited. If such restrictions are not imposed, then again, you have established an unfair standard that allows extensive destruction by those who seek commercial gain from the Sanctuary while prohibiting potential destruction by those who seek to use the park for NON commercial activities.

d. The same comments are true for the heritage designation as they are for the historical designation.

The mission of the sanctuary is as follows:

*To conserve, protect and enhance the biological diversity, ecological integrity and cultural legacy of the sanctuary while facilitating compatible use.*

SCUBA diving is a compatible use of Maritime Heritage. Why else preserve this heritage if not to share it with the public. Diving does pose some inherent risk to historical sites. However, the dive community can also provide a valuable resource to the Stellwagen Bank National Marine Sanctuary. We would make the following recommendations to the action plan:

1. Develop an action plan that involves the dive community in the preservation, management and protection of our Maritime Heritage.
2. Develop an action plan that provides improved access to the dive community to the resources of the Stellwagen Bank (in much the same way that you do for commercial fishing).

We would like to make some final comments regarding your action plan for Marine Mammals. In this section, you cite that there are existing laws that regulate how close whale watching boats may come to a whale. We were enraged to learn recently in the Boston Globe that whale watching operators were routinely violating this law (including the charter we use). Your solution seems to be to increase the amount of regulation. We would propose that your action plan focus less on development of regulations (MMBD1) and more on educating boat operators AND the general public regarding existing laws. Then focus on ways to enforce existing laws and regulations.

Again, thank you for the opportunity to provide comments to the action plan.

Respectfully submitted,



Valerie Feehan  
34 Puritan Road  
Swampscott, MA 01907



John Feehan  
34 Puritan Road  
Swampscott, MA 01907

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Boston University DMP Public Meeting

10 June 08

Statement by Sally Yozell, Director of the Marine Conservation, the Nature Conservancy, Eastern Region, June 10, 2008

My Name is Sally Yozell and I am the Director of Marine Conservation for the Nature Conservancy's Eastern Region. The Nature Conservancy (The Conservancy) is an international non-profit dedicated to protecting ecologically important lands and waters for nature and people. Our success in protecting over 117 million acres of land and 5,000 miles of rivers worldwide and operating over 100 marine conservation projects globally has depended on our ability to use a science-based approach to pursue pragmatic solutions with our partners in all levels of government and the private sector.

Thank you for the opportunity to comment on the draft Stellwagen Bank National Marine Sanctuary Management Plan. In the late 1980's Senator John Kerry and the late Congressman Gerry Studds co-authored the Senate and House legislation which established the Stellwagen Bank National Marine Sanctuary. The goal then was to create a place, -- an area, -- a boundary where we could both study and protect this unique, magnificent and bountiful marine environment.

Twenty years later Stellwagen Bank National Marine Sanctuary is still home to some of the most diverse marine resources in our region. There are at least thirteen species of marine mammals including the endangered Atlantic Right Whale, and Humpback whale, and it is a place where numerous porpoise and whales feed, mate and migrate. In addition to marine mammals,-- the Stellwagen Bank ecosystem supports sea birds, sea turtles, commercial, recreational and forage fish, deep sea corals and the critical marine habitats that these species depend upon.

One of Studds and Kerry's initial goals has been met; --the Sanctuary is one of the most studied areas off the Northern Atlantic coast. But sadly it is not one of the most protected places. Independent scientists and scientist with the Sanctuary program have in fact documented a serious decline in the health of the habitat and many of the species that live their.

There have been some conservation management successes within the Sanctuary:

- Shipping lanes have been moved to safeguard the migration of the endangered whales,
- Oil and gas drilling, sand and gravel mining and ocean dumping are all prohibited activities within the Sanctuary
- The National Marine Fisheries Service has implemented seasonal and rolling closures for stressed out fisheries.

But overall from a full ecosystem management perspective, this Sanctuary has not been well managed. And after almost a decade in the making this plan does not go far enough to get beyond the sector by sector, piecemeal approach which has proven so problematic.

The State of the Sanctuary Report which came out last spring and the Sanctuary Management Plan make a compelling case for strong conservation actions. The documents claim for example that heavy bottom trawling gear is destroying important species habitats and that certain gear and nets are indiscriminately snaring marine mammals while non-targetted fish species are being wasted in nets as "by catch". If this is the case, then the Sanctuary Program should be working with industry, the Fisheries Service, the fishery management councils and Congress to develop and issue regulations that address these specific scientific concerns. Why not propose strong regulations in the management plan that develop better approaches to management such as buying back offensive gear types and pioneering the development of new ones.

In the Florida Keys National Marine Sanctuary Program, the fishermen, the fishery management councils, NMFS and Congress have all worked together to develop meaningful regulations that are protecting the Sanctuary while at the same time ensuring the economic viability of the fishing

community, tourism and recreation. Stellwagen Bank needs to take a page from their play book and work with their partners. The Sanctuary needs real protection, and the affected industries deserve certainty in proposed regulations not ambiguity which is laid out in this Plan. Areas where significant improvement might be made include the Sanctuary:

- Working with industry, other federal and state agencies, councils and Congress to develop and implement regulations that are meaningful and have ecological teeth. Give both the human and ecological communities that rely on this resource certainty in the future.
- Look at the whole ecosystem, and manage the commercial, recreational and scientific activities in a fair and integrated manner.
- Work to better manage shipping, fishing, and whale-watch boats to prevent endangered whales from being disturbed, entangled, or killed while they inhabit the Sanctuary.
- Developing market based incentives and solutions , and habitat friendly gear and technologies that minimize damage to the Sanctuary habitats.

Thank you

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June 11, 2008

**Stellwagen Bank Marine Sanctuary Statement**

My name is Susan Playfair. I am the author of *Vanishing Species*, and a Board Member of Friends of South Shore Fisheries.

Friends of South Shore Fisheries applauds the Sanctuary Staff for its work in researching and compiling the Stellwagen Bank Draft Management Plan and its accompanying Review. However we have a few comments and suggestions.

The stated Sanctuary Mission is "to conserve, protect and enhance the biological diversity, ecological integrity and cultural legacy of the sanctuary while facilitating compatible uses." Commercial fishing should be viewed as the principle compatible use. As the review points out, "fishermen make the sanctuary waters safer." To deny the importance of their contributions is to deny that commercial fishermen provide one of the healthiest food sources available on the planet. Contrary to the mission, page 7 of the Plan Review is highly inflammatory in its tone, its outdated data, and its omissions. We would like to see it rewritten in order to give a more balanced view of the benefits and interdependent nature of commercial fishing and the stated mission of Stellwagen Bank.

The National Marine Sanctuaries Act requires that marine sanctuaries be required "to facilitate to the extent compatible with the primary objective of resource

protection, all public and private uses of the resources of these marine areas not prohibited pursuant to other authorities." At present, a 1200 NM area closed to fishing abuts and overlaps the Sanctuary. Commercial groundfishing and use of bottom-tending mobil gear is prohibited in this area. In addition, areas where groundfishing is prohibited through seasonal closures for up to four months each year overlap the entire sanctuary. These restrictions to commercial fishing are not adequately mentioned until page 81 of the Draft Management Plan. We hope this oversight can be corrected in the final plan.

The National Marine Sanctuaries Act also requires the Plan "to create models of, and incentives for, ways to conserve and manage these areas, including the application of innovative management techniques." The Draft Management Plan for Stellwagen Bank cites scientific studies indicating the importance of conserving fish species by preserving older and larger spawning females. We would like to suggest an "innovative management technique" geared to accomplishing this goal while allowing a healthy commercial fishing community. Commercial Fishing must be seen as an integral means to conservation of a healthy resource within a marine sanctuary. We suggest that zones within the sanctuary be set aside for the growth of large, female members of the various species of groundfish. All human activity would be prohibited within these breeding grounds. Commercial fishing would take place at the edges of the breeding grounds.

Commercial fishing cannot have additional restrictions placed on it. And regulatory bycatch must not be encouraged by any final sanctuary plan. Thus, I

propose that commercial fishermen fishing on the perimeter of breeding grounds established by any sanctuary plan not be ruled by species management.

Yield has increased in the other marine sanctuaries where this plan has been tried. We encourage NOAA, the National Marine Fisheries Service, and others in charge of the Gerry E. Studds Stellwagen Bank National Marine Sanctuary to adopt a similar plan.

Thank you for your consideration.

Susan R. Playfair

Friends of South Shore Fisheries

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## Re: Comments on the Draft Management Plan and Environmental Assessment for the Gerry E. Studds Stellwagen Bank National Marine Sanctuary.

Thank you for allowing me to provide comments on the Management Plan. I was privileged to serve in an advisory capacity for 3 of the marine mammal-related working groups. I live in Massachusetts and, in the past, have worked as a naturalist aboard whale watching vessels and participated in marine mammal research on Stellwagen Bank. I am strongly vested in the health of the waters near my home and, on behalf of the more than 10 million members and constituents of the Humane Society of the United States (The HSUS or we) who either live near the Sanctuary or have opportunity to visit its waters, I want to say that we believe it is critical that this area remain a vital and diverse habitat for its marine inhabitants.

In its self-evaluation, the Sanctuary gave itself middling marks for the conditions and status of its resources. To that end, the Plan provides objectives and strategies to improve conservation of the very characteristics and inhabitants that make Stellwagen Bank NMS unique. We would like to address several key aspects of this protection.

First, we support the need to develop and implement regulations to restrain the conduct of boats watching whales. I have seen vessels strike whales. I have observed routine violation of the National Marine Fisheries Service voluntary whale watch guidelines and I believe it is time to regulate the conduct of vessels to safeguard whales in this important feeding area. This is addressed under Marine Mammal Behavioral Disturbance (MMBD) 1.1 and 1.2. The strategies under 1.1.1 and 1.1.2 simply say that the Sanctuary should "consider" taking action to restrict speed, approach and "develop a process" to prevent disturbance of bubble clouds used by feeding whales. I believe it should do more than just consider action; it should *take* action by issuing its own regulations.

It is also vital to assure that the resources that attract marine mammals to the Stellwagen Bank area remain protected. The harvest of sand lance should be prohibited. This is addressed in the section on Ecosystem Alteration (specifically EA 3.3.1). If the National Marine Fisheries Service (NMFS) will not act to prohibit this harvest, then the Sanctuary must act to protect its own resources. More generally we support other objectives in 3.3 relating to the need to strictly regulate the harvest of forage fish (e.g., herring and mackerel).

Once in the Sanctuary, whales face risk from vessel collisions and entanglement in fishing gear. We would like to praise the Sanctuary for its involvement in cutting edge acoustic monitoring. I serve on innumerable NMFS task forces, working groups and advisory panels and this research is continually mentioned as a model for monitoring programs that should be adopted elsewhere. This monitoring can help reduce risk to whales in the Sanctuary environs as you proceed to develop

Promoting the protection of all animals

2100 L Street, NW, Washington, DC 20037 ■ 202-452-1100 ■ Fax: 202-778-6132 ■ [www.hsus.org](http://www.hsus.org)

## Comments of the HSUS on the Draft Management Plan and EA for Stellwagen Bank

regulations on the conduct of vessels and fisheries using its waters. Having said that, I would also like to recommend that the Sanctuary extend itself even further as a living laboratory for other vital research, including fishing gear research. I would like to highlight two important avenues.

First, much has been discussed (including in the Management Plan and the excellent summary provided in “Stellwagen Banknotes”) about the impact of bottom trawling. I believe that the Sanctuary should be used as a “no trawl” area to allow broader scale comparison of effects of prohibiting gear that so dramatically disturbs the benthos and alters habitat to the detriment of diversity in floral and faunal composition. The section on Environmental Alteration (specifically EA 2) provides recommendations to develop plans and benchmarks for monitoring impacts. But impacts are well known through work of Peter Auster and others. I believe the Sanctuary should go further. The Sanctuary should allow itself to serve as refugia for marine life by prohibiting mobile gear in the majority of, or the entire, Sanctuary which would allow recovery to take place. This living laboratory could provide example and impetus for protecting important marine diversity and productivity elsewhere, much as the Sanctuary’s use of acoustic monitoring is being exported to other areas.

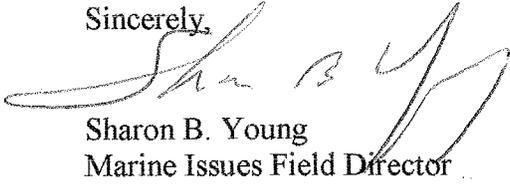
Further, the Objectives in the Management Plan specifically address the need to reduce entanglement risk. While we support the objectives in MME 1 through 3, we believe that the Sanctuary should, once again, give more serious consideration to its role as a living laboratory for assisting marine protection. MME 2 .2 recommends serving as a “test-bed” for developing and demonstrating low-risk trap and pot gear. Scientists on the NMFS Atlantic Large Whale Take Reduction Team unanimously declared that the only truly risk-free fishing with trap and pot gear was to fish line-free. But there is little incentive to develop this method of fishing outside of litigation to force its adoption. The Sanctuary could assist this process by closing its waters to all but line-free trap and pot fishing (something that could be greatly assisted if there is no bottom trawling). This would provide fishermen an incentive to use line-free gear in order to gain access to fishing in the Sanctuary that is prohibited to traditional gear. Once again, the Sanctuary can use its special status to advance protection of marine resources.

While we recognize that there is a long road ahead to deal with the challenges facing what is essentially a high-use and, if you will, “urban sanctuary,” we believe that the Stellwagen Bank Sanctuary has played a vital role in helping preserve coastal resources. The Sanctuary’s staff works diligently to undertake research that advances our understanding of the use of our coastal waters both by humans and the marine life which the Sanctuary exists to serve. Its active Advisory Council can provide a model to collaborative processes. The waters of the Sanctuary are one of the few, readily accessible areas where the public can enjoy watching marine wildlife in a natural setting, making protection of those resources and their habitat a critical goal. We commend you for reviewing your actions to date and mapping a direction to the future. And we look forward to working with you as you move forward to adopt this plan and continue to provide vital research and management action to assist the conservation of marine resources.

**Comments of the HSUS on the Draft Management Plan and EA for Stellwagen Bank**

Again, thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon B. Young". The signature is fluid and cursive, with the first name "Sharon" being the most prominent.

Sharon B. Young  
Marine Issues Field Director  
The Humane Society of the United States



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06/16/08

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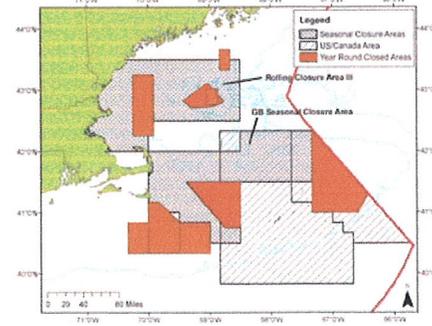
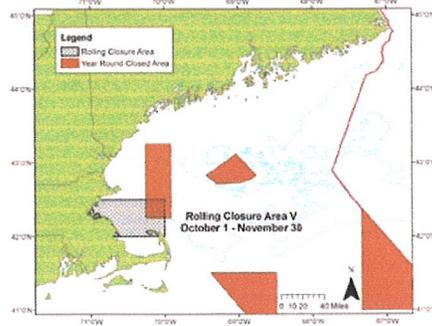
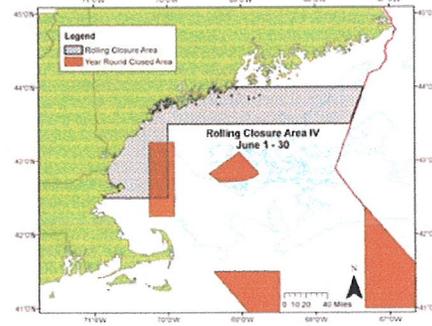
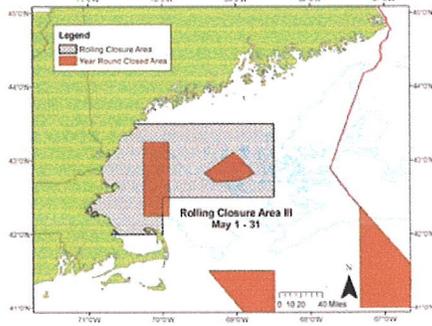
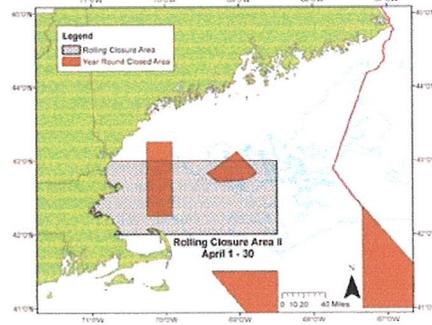
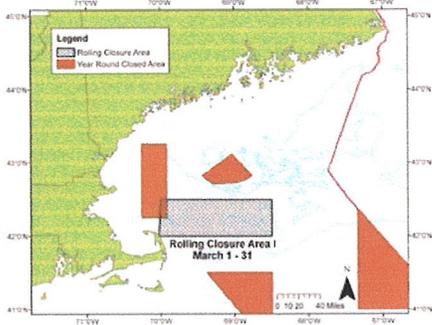
# Northeast Multispecies Information Sheet

## Closed Area Regulations

This summary is not a substitute for the regulations; rather it provides a broad overview of restrictions and requirements. You must read the regulations in conjunction with this information sheet to fully understand how this fishery is managed. This information sheet will be updated when regulations are revised. The regulations summarized here may be found at 50 CFR 648.81.

This information sheet summarizes the Northeast (NE) multispecies regulations pertaining to:

Seasonal closures .....	2-7
Year-round closures .....	8-9
Essential Fish Habitat (EFH) closures .....	10-11
Transiting regulations and gear stowage requirements .....	12

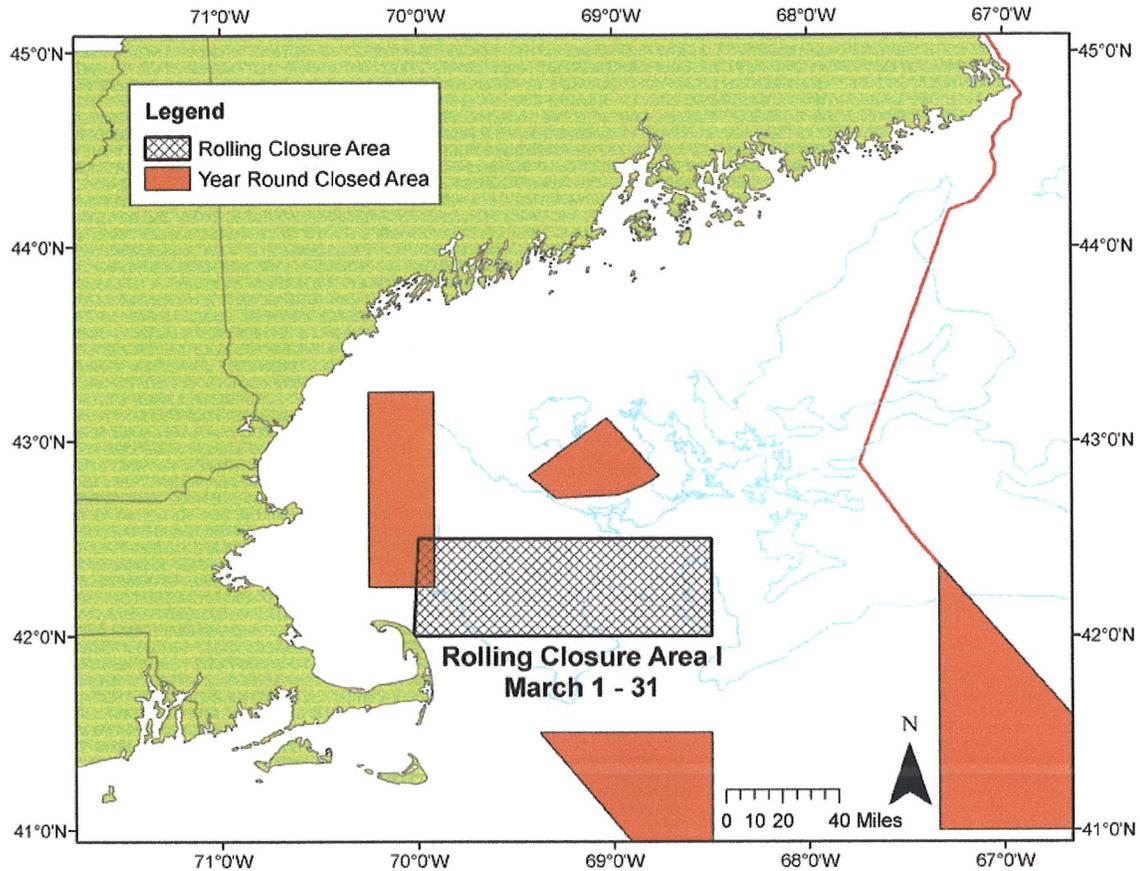


Steve Wojcicki - Portsmouth, NH 16 Jun 08

**GULF OF MAINE (GOM) ROLLING CLOSURE AREAS AND GEORGES BANK (GB) SEASONAL CLOSURE AREA**

The GOM Rolling Closure Areas and the GB Seasonal Area depicted below are closed to all fishing vessels with the following exemptions: Vessels that do not have a Federal NE multispecies permit and are fishing exclusively in state waters; charter and party vessels\*; recreational vessels; vessels fishing with spears, rakes, diving gear, cast nets, tongs, harpoons, weirs, dip nets, stop nets, pound nets, pots and traps, purse seines, mid-water trawls, surf clam/quaahog dredge gear, pelagic hook and line, pelagic longlines, single pelagic gillnets, shrimp trawls (with properly configured grates); and sea scallop dredge gear when under a scallop day-at-sea (DAS), or lawfully in a scallop dredge exemption area.

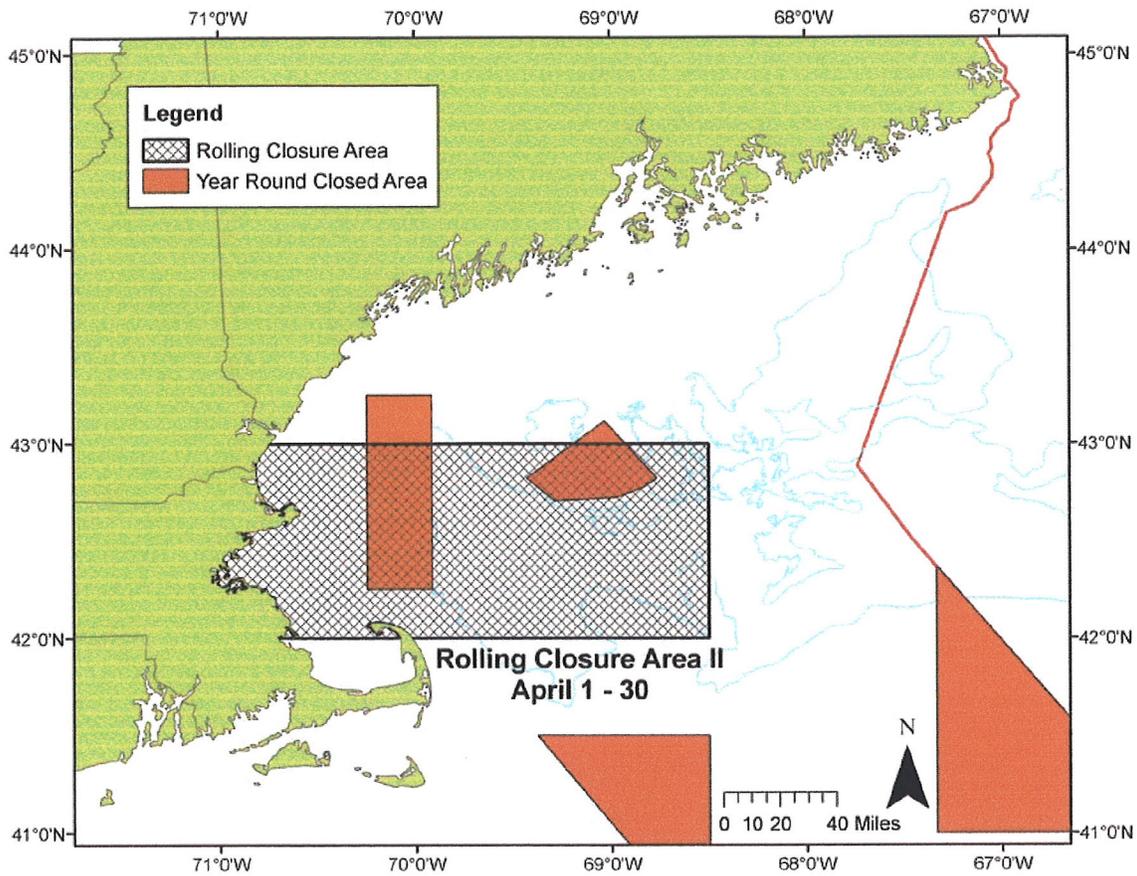
\*Charter and party vessels may fish in the GOM Rolling Closure Areas provided they have a Letter of Authorization from the Regional Administrator to enter or fish in these areas. A letter of authorization is valid from the date of enrollment through the duration of the closure or 3 months duration, whichever is greater, and is available by calling the Permit Office at 978-281-9370 x6438.



Rolling Closure Area I is defined by straight lines connecting the following points in the order stated:

Rolling Closure Area I		
Point	N. Lat.	W. Long.
GM3	42° 00'	(1)
GM5	42° 00'	68° 30'
GM6	42° 30'	68° 30'
GM23	42° 30'	70° 00'
GM3	42° 00'	(1)

(1) Cape Cod Shoreline on the Atlantic Ocean

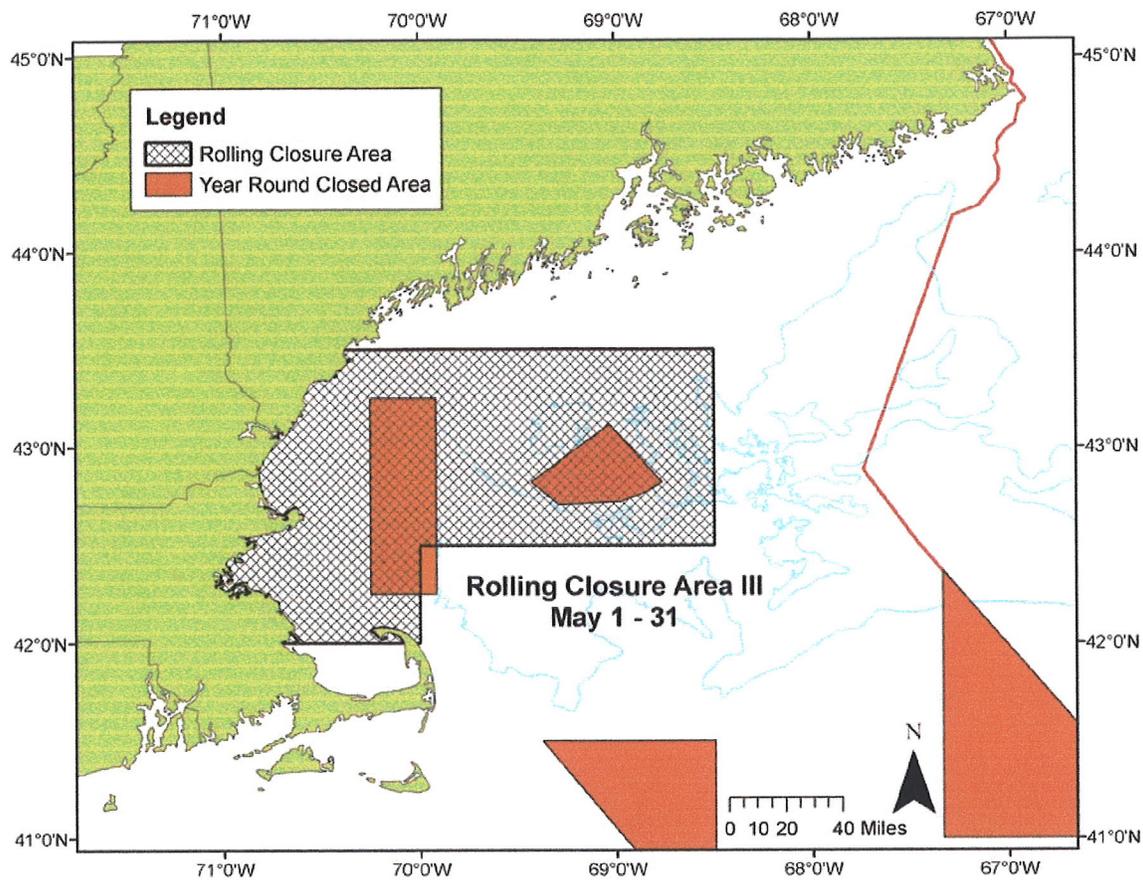


Rolling Closure Area II is defined by straight lines connecting the following points in the order stated:

Rolling Closure Area II

Point	N. Lat.	W. Long.
GM1	42° 00'	(1)
GM2	42° 00'	(2)
GM3	42° 00'	(3)
GM5	42° 00'	68° 30'
GM13	43° 00'	68° 30'
GM9	43° 00'	(4)
GM1	42° 00'	(1)

- (1) Massachusetts shoreline.
- (2) Cape Cod shoreline on Cape Cod Bay.
- (3) Cape Cod shoreline on the Atlantic Ocean.
- (4) New Hampshire shoreline.

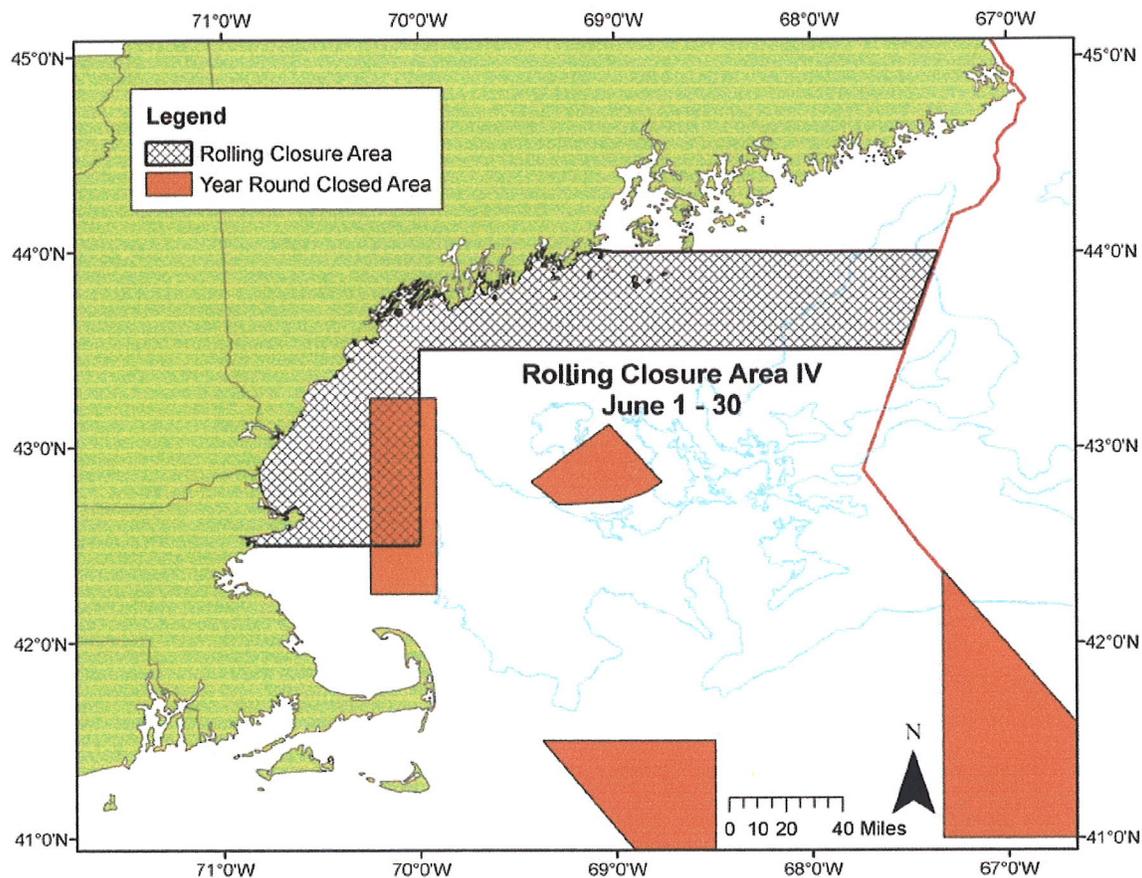


Rolling Closure Area III is defined by straight lines connecting the following points in the order stated:

Rolling Closure Area III

Point	N. Lat.	W. Long.
GM1	42° 00'	(1)
GM2	42° 00'	(2)
GM3	42° 00'	(3)
GM4	42° 00'	70° 00'
GM23	42° 30'	70° 00'
GM6	42° 30'	68° 30'
GM14	43° 30'	68° 30'
GM10	43° 30'	(4)
GM1	42° 00'	(1)

- (1) Massachusetts shoreline.
- (2) Cape Cod shoreline on Cape Cod Bay.
- (3) Cape Cod shoreline on the Atlantic Ocean.
- (4) Maine shoreline.

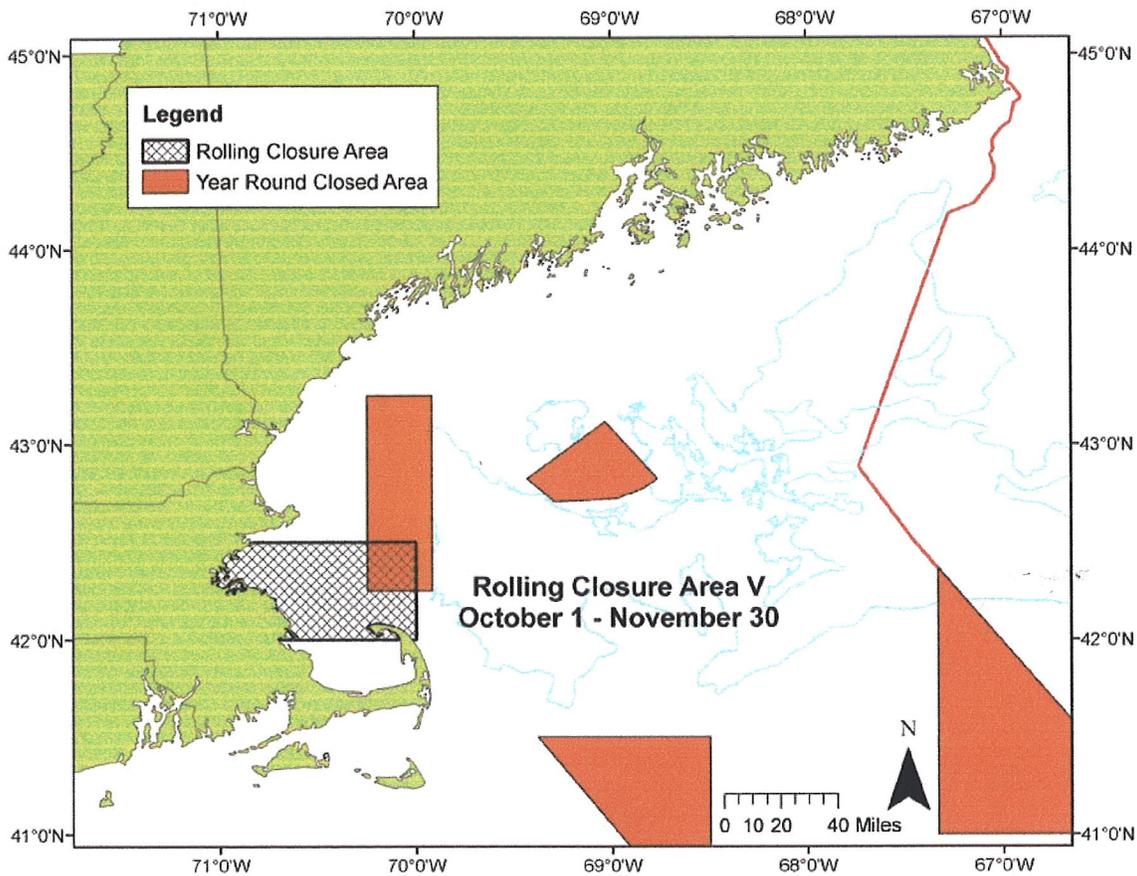


Rolling Closure Area IV is defined by straight lines connecting the following points in the order stated:

Rolling Closure Area IV

Point	N. Lat.	W. Long.
GM9	42° 30'	(1)
GM23	42° 30'	70° 00'
GM17	43° 30'	70° 00'
GM19	43° 30'	67° 32' or (2)
GM20	44° 00'	67° 21' or (2)
GM21	44° 00'	69° 00'
GM22	(3)	69° 00'
GM9	42° 30'	(1)

- (1) Massachusetts shoreline.
- (2) U.S. - Canada maritime boundary.
- (3) Maine shoreline.



Rolling Closure Area V is defined by straight lines connecting the following points in the order stated:

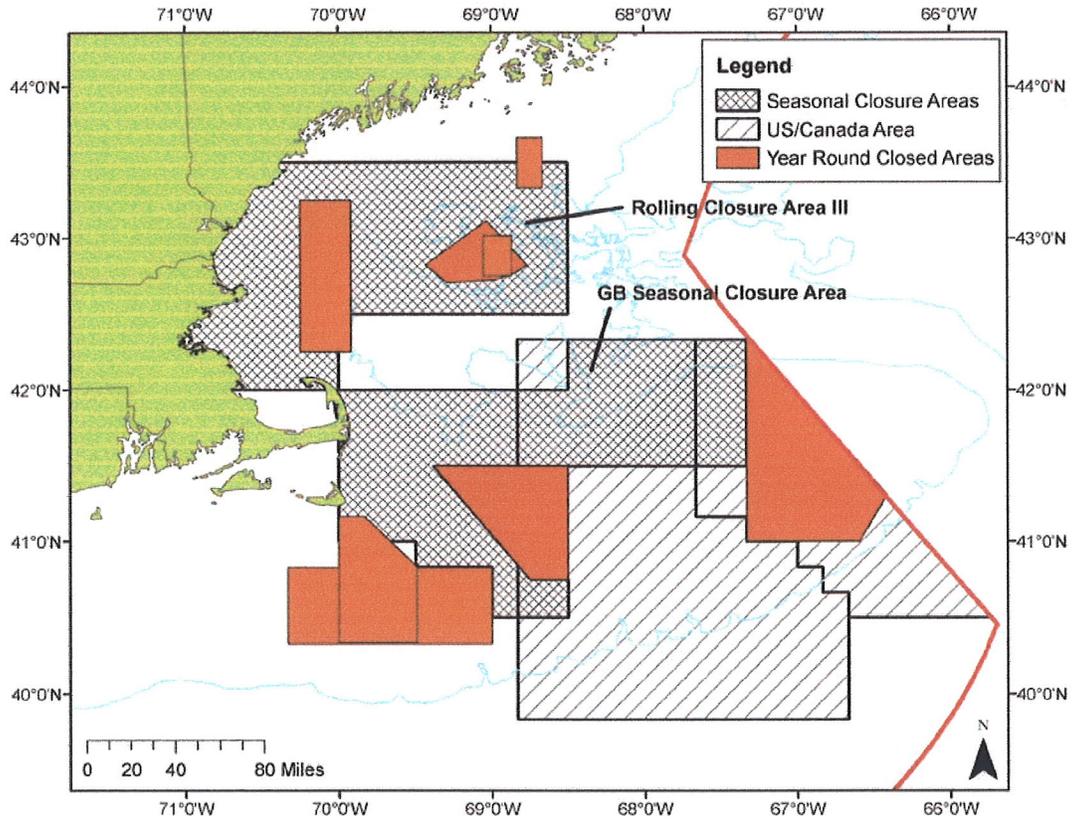
Rolling Closure Area V

Point	N. Lat.	W. Long.
GM1	42° 00'	(1)
GM2	42° 00'	(2)
GM3	42° 00'	(3)
GM4	42° 00'	70° 00'
GM8	42° 30'	70° 00'
GM9	42° 30'	(1)
GM1	42° 00'	(1)

- (1) Massachusetts shoreline.
- (2) Cape Cod shoreline on Cape Cod Bay.
- (3) Cape Cod shoreline on the Atlantic Ocean.

## GB SEASONAL CLOSURE AREA

The GB Seasonal Closure Area is closed from May 1 to May 31 each year



The GB Seasonal Closure Area is defined by straight lines connecting the following points in the order stated:

GB Seasonal Closure Area

Point	N. Lat.	W. Long.
GB1	42° 00'	(1)
GB2	42° 00'	68° 30'
GB3	42° 20'	68° 30'
GB4	42° 20'	67° 20'
GB5	41° 30'	67° 20'
CL1	41° 30'	69° 23'
CL2	40° 45'	68° 45'
CL3	40° 45'	68° 30'
GB6	40° 30'	68° 30'
GB7	40° 30'	69° 00'
G10	40° 50'	69° 00'
GB8	40° 50'	69° 30'
GB9	41° 00'	69° 30'
GB10	41° 00'	70° 00'
G12	(1)	70° 00'

(1) Northward to its intersection with the shoreline of Mainland Massachusetts.

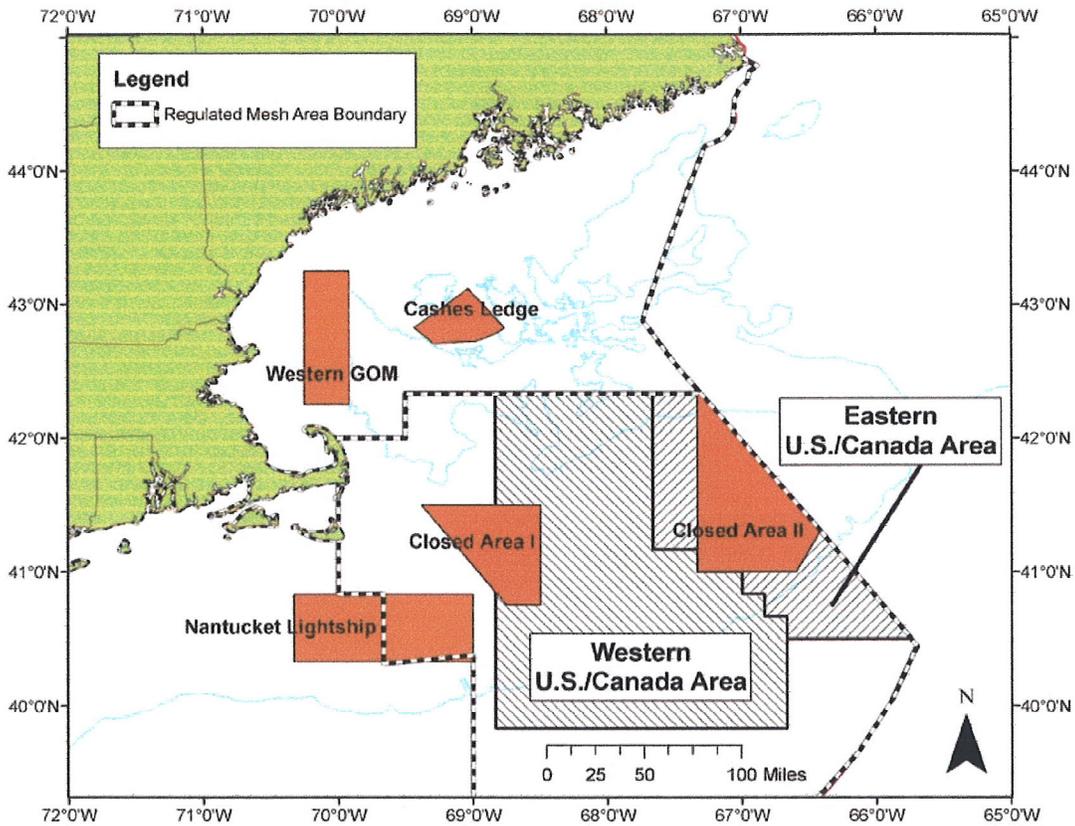
*For the purposes of the GB Seasonal Closure Area only, vessels fishing with scallop dredge gear under a scallop DAS or in the Scallop Dredge Fishery Exemption Area are exempt, provided that the vessel uses a 10-inch twine top and complies with other applicable NE multispecies possession limits.*

## YEAR-ROUND GROUNDFISH CLOSURE AREAS

### GOM

The Western GOM and Cashes Ledge Closure Areas depicted below are closed year-round to all fishing vessels, with the following exemptions: Charter and party\* or recreational vessels; vessels fishing with spears, rakes, diving gear, cast nets, tongs, harpoons, weirs, dip nets, stop nets, pound nets, pots and traps, purse seines, mid-water trawls, surf clam/quaahog dredge gear, pelagic hook and line, pelagic longlines, single pelagic gillnets, and shrimp trawls (with properly configured grates).

\*Charter and party vessels may fish in the Western GOM and Cashes Ledge Closure Areas provided they have a Letter of Authorization from the Regional Administrator to enter or fish in these areas. A Charter/Party Letter of Authorization is valid from the date of enrollment until the end of the fishing year and is available by calling the Permit Office at 978-281-9278.



The Western GOM Closure Area and the Cashes Ledge Closure Area, respectively, are defined by straight lines connecting the following points in the order stated:

**Western GOM Closure Area**

Point	N. Lat.	W. Long.
WGM1	42° 15'	70° 15'
WGM2	42° 15'	69° 55'
WGM3	43° 15'	69° 55'
WGM4	43° 15'	70° 15'
WGM1	42° 15'	70° 15'

**Cashes Ledge Closure Area**

Point	N. Lat.	W. Long.
CL1	43° 07'	69° 02'
CL2	42° 49.5'	68° 46'
CL3	42° 46.5'	68° 50.5'
CL4	42° 43.5'	68° 58.5'
CL5	42° 42.5'	69° 17.5'
CL6	42° 49.5'	69° 26'
CL1	43° 07'	69° 02'

GB AND SOUTHERN NEW ENGLAND

Closed Area I (CA I) - CA I, unless further restricted under the EFH Closure Areas, is closed year-round to all fishing vessels, with the following exceptions: Vessels fishing with or using pot gear designed to take lobsters or hagfish, pelagic hook and line gear, pelagic longline gear, harpoon gear, tuna purse seine, pelagic mid-water trawl gear\*, and tuna purse seine gear, provided no regulated species are kept and no other gear capable of catching NE multispecies is on board; vessels participating in a NE multispecies Special Access Program (SAP) and vessels fishing for scallops in the CA I Access Area. CA I is defined by straight lines connecting the following points in the order stated:

CA I

Point	N. Lat.	W. Long.
CI1	41° 30'	69° 23'
CI2	40° 45'	68° 45'
CI3	40° 45'	68° 30'
CI4	41° 30'	68° 30'
CI1	41° 30'	69° 23'

Closed Area II (CA II) - CA II, unless further restricted under the EFH Closure Areas, is closed year-round to all fishing vessels, with the following exceptions: Vessels fishing with or using pot gear designed to take lobsters or hagfish, pelagic hook and line gear, pelagic longline gear, harpoon gear, tuna purse seine outside the portion of CA II known as the Habitat of Particular Concern, Pelagic mid-water trawl gear\*, provided no regulated species are kept and no other gear capable of catching NE multispecies is on board; and vessels fishing in a SAP. CA II is defined by straight lines connecting the following points in the order stated:

CA II

Point	N. Lat.	W. Long.
CII1	41° 00'	67° 20'
CII2	41° 00'	66° 35.8' *
G5	41° 18.6'	66° 24.8' *
CII3	42° 22'	67° 20'
CII1	41° 00'	67° 20'

\*The U.S.-Canada maritime boundary.

Nantucket Lightship Closed Area (NLCA) - NLCA, unless further restricted under the EFH Closure Areas, is closed year-round to all fishing vessels, with the following exceptions: Vessels fishing with or using pot gear designed to take lobsters or hagfish, pelagic hook and line gear, pelagic longline gear, tuna purse seine, harpoon gear, pelagic mid-water trawl gear\*, surf clam/quahog dredge gear, provided no regulated species are kept and no other gear capable of catching NE multispecies is on board; scallop vessels fishing in the Nantucket Lightship Access Area and charter/ party or recreational vessels. Charter and party vessels must have a letter of authorization from the Regional Administrator to enter or fish in this area. A letter of authorization may be obtained by calling the Permit Office at 978-281-9370 x6438. NLCA is defined by straight lines connecting the following points in the order stated:

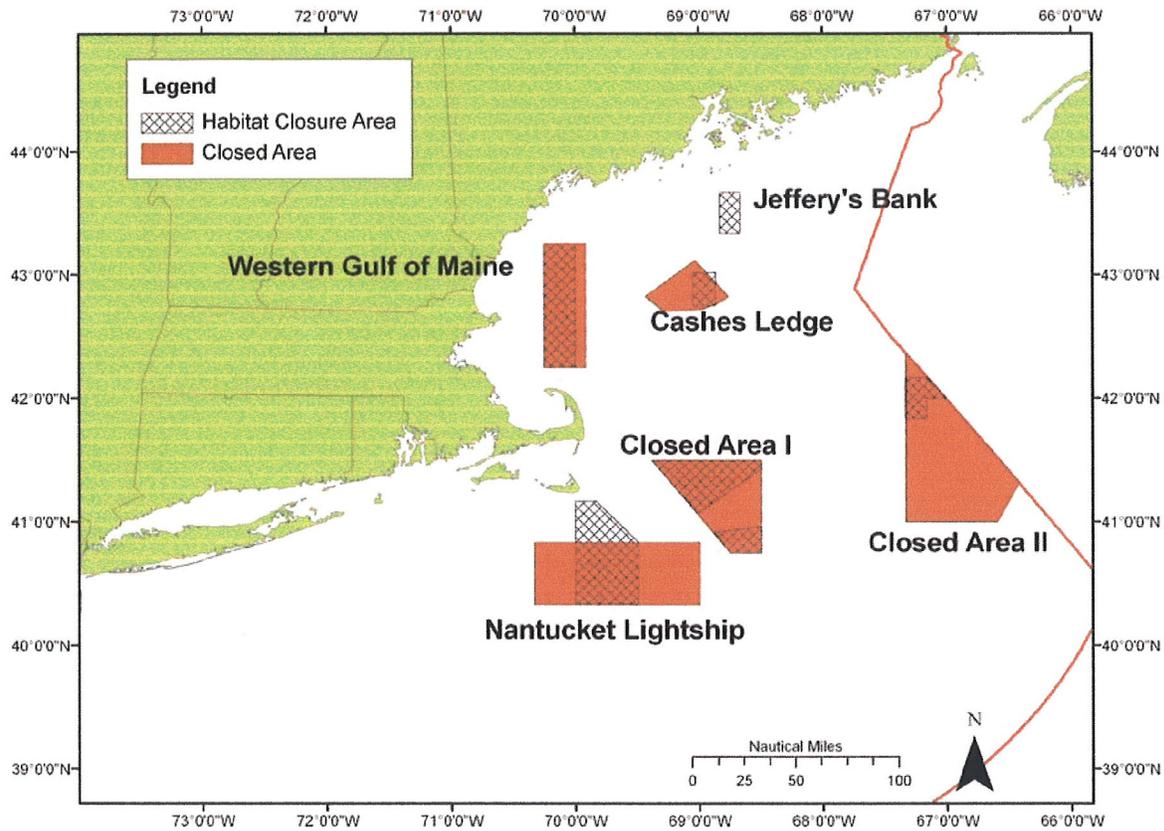
Nantucket Lightship Closed Area

Point	N. Lat.	W. Long.
G10	40° 50'	69° 00'
CN1	40° 20'	69° 00'
CN2	40° 20'	70° 20'
CN3	40° 50'	70° 20'
G10	40° 50'	69° 00'

\*Vessels using mid-water trawl gear must have on board a letter of authorization issued by the Regional Administrator. Mid-water trawl vessels are issued a letter of authorization for a minimum of 7 days. The vessel can be issued LOAs for the midwater trawl exempted fishery and the purse seine exempted fishery at the same time. A letter of authorization may be obtained by calling the Permit Office at 978-281-9370 x6438.

## YEAR-ROUND EFH CLOSURES

EFH Closure Areas depicted below are closed year-round to all bottom-tending mobile gears. Bottom-tending mobile gear is defined as the following: Gear in contact with the ocean bottom, and towed from a vessel, which is moved through the water during fishing in order to capture fish, and includes otter trawls, beam trawls, hydraulic dredges, non-hydraulic dredges, and seines (with the exception of a purse seine).



The Western GOM Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

### Western GOM Habitat Closure Area

Point	N. Lat.	W. Long.
WGM4	43° 15'	70° 15'
WGM1	42° 15'	70° 15'
WGM5	42° 15'	70° 00'
WGM6	43° 15'	70° 00'
WGM4	43° 15'	70° 15'

The Cashes Ledge Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

### Cashes Ledge Habitat Closure Area

Point	N. Lat.	W. Long.
CLH1	43° 01'	69° 03'
CLH2	43° 01'	68° 52'
CLH3	42° 45'	68° 52'
CLH4	42° 45'	69° 03'
CLH1	43° 01'	69° 03'

The Jeffrey's Bank Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

Jeffrey's Bank Habitat Closure Area

Point	N. Lat.	W. Long.
JB1	43° 40'	68° 50'
JB2	43° 40'	68° 40'
JB3	43° 20'	68° 40'
JB4	43° 20'	68° 50'
JB1	43° 40'	68° 50'

The CA I North Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

CA I North Habitat Closure Area

Point	N. Lat.	W. Long.
CI1	41° 30'	69° 23'
CI4	41° 30'	68° 30'
CIH1	41° 26'	68° 30'
CIH2	41° 04'	69° 01'
CI1	41° 30'	69° 23'

The CA I North Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

CA I South Habitat Closure Area

Point	N. Lat.	W. Long.
CIH3	40° 55'	68° 53'
CIH4	40° 58'	68° 30'
CI3	40° 45'	68° 30'
CI2	40° 45'	68° 45'
CIH3	40° 55'	68° 53'

The CA II Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

CA II Habitat Closure Area

Point	N. Lat.	W. Long.
CIH1	42° 10'	67° 20'
CIH2	42° 10'	67° 9.3'
CIH3	42° 00'	67° 0.5'
CIH4	42° 00'	67° 10'
CIH5	41° 50'	67° 10'
CIH6	41° 50'	67° 20'
CIH1	42° 10'	67° 20'

The Nantucket Lightship Habitat Closure Area is defined by straight lines connecting the following points in the order stated:

Nantucket Lightship Habitat Closure Area

Point	N. Lat.	W. Long.
NLH1	41° 10'	70° 00'
NLH2	41° 10'	69° 50'
NLH3	40° 50'	69° 30'
NLH4	40° 20'	69° 30'
NLH5	40° 20'	70° 00'
NLH1	41° 10'	70° 00'

## TRANSITING REGULATIONS

A vessel may transit CA I, the Nantucket Lightship Closed Area, the Cashes Ledge Closed Area, the Western GOM Closure Area, the GOM Rolling Closure Areas, the GB Seasonal Closure Area, and the EFH Closure Areas provided that its gear is stowed in accordance with the regulations summarized below.

A vessel may transit CA II for valid and compelling safety reasons or when lawfully fishing in the U.S./Canada Management Areas, provided fishing gear is stored in accordance with the regulations summarized below.

## GEAR STOWAGE REQUIREMENTS

For gear to be considered legally stowed for the purpose of transiting a closed area, a vessel must meet one or more of the following requirements:

### TRAWL GEAR

- A net stowed below deck: Provided it is located below the main working deck from which the net is deployed and retrieved; the towing wires, including the leg wires, are detached from the net; and it is fan-folded (flaked) and bound around its circumference.
- A net stowed and lashed down on deck: Provided it is fan-folded (flaked) and bound around its circumference; it is securely fastened to the deck or rail of the vessel; and the towing wires, including the leg wires, are detached from the net.
- On-reel stowage for vessels transiting Seasonal Closure Areas: A net that is on a reel and is covered and secured, provided: The entire surface of the net is covered with canvas or other similar opaque material that is securely bound; the towing wires are detached from the doors; and no containment rope, codend tripping device, or other mechanism to close off the codend is attached to the codend.
- On-reel stowage for vessels transiting the Permanent Closure Areas: A net that is on a reel and is covered and secured, provided: The entire surface of the net is covered with canvas or other similar opaque material that is securely bound; the towing wires are detached from the net; and the codend is removed and stored below deck.

### SCALLOP DREDGES

- The towing wire is detached from the scallop dredge, the towing wire is reeled up onto the winch, and the dredge is secured and covered so that it is rendered unusable for fishing.

### HOOK GEAR

- All anchors and buoys are secured and all hook gear, including jigging machines, is covered.

### SINK GILLNET GEAR

- All nets are covered with canvas or other similar material and lashed or otherwise securely fastened to the deck or rail, and all buoys larger than 6 inches (15.24 cm) in diameter, high flyers, and anchors are disconnected.

RECEIVED  
6/18/08

Craig MacDonald, Ph.D.  
Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Comments of Frank Mirarchi  
67 Creelman Drive  
Scituate, MA 02066

Dear Dr. MacDonald,

Thank you for the opportunity to comment on the Stellwagen Bank National Marine Sanctuary Draft Management Plan and Environmental Assessment. For me, the waters of the Sanctuary are a special and important place.

I am a commercial fisherman. I have fished in the southwestern Gulf of Maine and the region east of Cape Cod for 46 years. Presently I estimate that 40 – 50% of my catch comes from within the Sanctuary's boundaries.

My home port is Scituate, Mass. From the pier where my boat is docked, I can clearly see the Sanctuary Headquarters across the harbor. That presence has been and must continue to be emblematic of a mutually beneficial relationship between the Sanctuary's managers and those who use its resources.

For that reason, I am disturbed by this document's tone, placement of information and seemingly deliberate emphasis on facts which tend to support a story line and the converse diminution or omission of those which do not. A document such as this, crowded with information, should be a springboard for constructive dialogue, not the antagonistic screed which I encountered.

To begin, under "key findings" in the Executive Summary you state "... fishing – especially commercial fishing – impacts and pressures every resource in the Sanctuary." The paragraph continues on to highlight seabed habitat disturbance, wasteful discarding, mammal entanglement and degradation of historic shipwrecks as if these conditions were the consequence of unregulated activities by intruders into the Sanctuary. Nowhere in the Executive Summary is there reference to the reality that all fishing in the U.S. Exclusive Economic Zone (EEZ including all of the SBNMS) is regulated by another NOAA agency, the National Marine Fisheries Service (NMFS).

It is not until Page 12 that one first learns of the existence and roles of other agencies and organizations having jurisdiction over the Sanctuary waters. Arguably, the placement diminishes the probability that the casual reader, whose principal information sources are the media, will obtain a contextual understanding of the complex, overlapping governance relationships within the Sanctuary.

No commercial fishing can occur within or outside the SBNMS without a permit issued by NMFS. In addition, NMFS regulates the sizes and amounts of fish, crustaceans, and mollusks which may be taken; the types, sizes and amounts of gear which may be used; the size and power of vessels which may be used and the number of days per year which a vessel may fish. In addition, a 1200 NM area, the Western Gulf of Maine Closed Area (WGOMCA) abuts and overlaps the Sanctuary. Commercial fishing for groundfish and use of bottom-tending mobile gear is prohibited in this area. Finally, seasonal closures which prohibit commercial fishing for groundfish for up to four months each year overlap the entire Sanctuary.

None of the above information is provided until page 81 of the document.

To the extent that the adverse conditions outlined in the Executive Summary and detailed in the body of the report exist, is it not reasonable to advocate re-examination of the management policies which allowed them to occur? Federal oversight of fisheries in this area began with passage of the Magnuson Act in 1976 and continues today.

In my opinion the lack of a contextual examination of fisheries policy with regard to impacts on Sanctuary resources is an egregious omission which seriously compromises the completeness of this document.

Throughout the text there are several instances where data appear to have been “cherry picked” to reinforce a thematic predisposition. One illustrative example appears beginning on page 78 under the heading, “Truncation of Size and Age Structure.” The primary data source cited is the NMFS trawl survey.

While the trawl survey provides a broad-area index of resource abundance it has such a large spatial scale that comparatively few stations occur within or near, the Sanctuary (on average under 10, twice a year). In addition, the trawl survey may have a negative bias toward large fish due to short tow duration and poor water flow characteristics within the survey net. Apparently no attempt was made to verify the conclusion of declining maximum fish size through other, readily available, data sets such as NMFS’ domestic observer program or catch-at-age analysis done by NMFS’ port sampling program.

In addition, the choice to terminate the initial study at the year 2000 is questionable. At that time stocks region-wide were just beginning to recover from nearly two decades of overfishing. There is near universal agreement that age structure truncation is characteristic of overfished stocks, yet the year 2000 predates significant increase in area closure and reductions in days-at-sea which measurably decreased stock wide fishing mortality rates. Table 41 on page 80 seems to reflect this trend reversal yet it remains largely disconnected from the conclusion provided on the preceding pages.

A second example of selective data use occurs at page 132 under the heading “Commercial Fishing.” In this instance VTR and SBNMS observer generated data are used to characterize the intensity and economic contribution of commercial fishing with the Sanctuary. The data truncates at 2005, one year before a major NMFS regulatory

action-Framework Adjustment 42 which transformed fishing strategies and greatly increased small boat groundfish fishermen's dependence on nearshore waters, especially those within SBNMS,

Moreover, Tables 15 and 16 on page 143, by summing 10 years of landings which accrued under now non-existent management regimes, skew and under represent the relative volume of economic value of SBNMS landings versus those from all areas. And, sure enough, the misleading figures of 1.8 – 2.9% value contribution are heralded in the Executive Summary. In addition, the range 1.8-2.9% given as the economic contribution of Sanctuary commercial fisheries is, in reality, slightly higher than its' expected yield when standardized for area. In effect, the Sanctuary waters are at a minimum, as productive as the average for all of New England.

The final, and most egregious, omission in the characterization of commercial fishing is in the failure to present and analyze data pertaining to the economic importance of Sanctuary waters to individual fishing ports. Regions, state and counties do not have cohesive fishing cultures. Communities do.

The perimeter of Massachusetts Bay is lined with a series of primarily small boat fishing harbors, including Gloucester, Beverly-Salem, Hull, Scituate, Green Harbor, Plymouth, Sandwich, Wellfleet, and Provincetown. In my opinion, without some access to Sanctuary waters, these ports would cease to exist as fishing communities. Any analysis which fails to include consideration of economic impacts at a local scale is inadequate and deceptive.

This report has been portrayed as a catalyst to dialogue and constructive engagement. In fact, it is polarizing and may well reinforce the stereotype of the Sanctuary as an elitist organization. This is particularly unfortunate because, in the realm of fisheries much needs to be done.

Fishery management in the New England region has generally failed to provide a model which balances sustainability with a stable business environment. As a consequence, the groundfish fishery has among the highest number of overfished stocks in the nation, the average vessel age exceeds 20 years, and the average fisherman is in his fifties. There are few young people entering the fishery principally due to income uncertainty.

The fishery continues to struggle under an inefficient input based management system which in less than eight years has reduced effective days-at-sea from 88 to 24 with the expectation of another draconian cut in 2009. Concurrently, regulatory discards have risen to absolutely disgraceful levels in excess of 50%, seriously compromising the attainment of mortality goals while angering and demoralizing fishermen.

The present system uses area closures primarily as a means of reducing fishing mortality by denying access to areas of high catch per unit effort (CPUE). This approach has several undesirable consequences which affect the Sanctuary. First, the proximity and scale of the WGOMCA concentrates effort in near shore areas including SBNMS.

Secondly, forcing fishermen to work in areas of lower CPUE necessitates more gear on the bottom time possibly exacerbating habitat impacts. Thirdly, the opening of seasonally closed areas invites a torrent of effort with high bycatch and habitat implications.

Although inconsistent with national policy, the current New England Fishery Management Plans (FMP) focus on attainment of target fishing mortality rates as a criterion of success. Ecosystem relationships and habitat impacts, while given consideration, are not primary operators.

The fishing industry, during the scoping process for Amendments 13 and 16 to the Multispecies (Groundfish) FMP, provided substantial input on alternative approaches. Two cross-cutting themes from both scoping processes were (1) moving to an output based system which directly counted catches and emphasized full retention and (2) enabling local decision making to mitigate harmful impacts on transient phenomena such as spawning aggregations.

These concepts were never developed due to the pressure of deadlines, limited data availability and inadequate staff for analysis and policy development. Although frustrated, organizations such as the Northeast Seafood Coalition and the Gulf of Maine Research Institute are continuing development of alternative management approaches.

Upon substantial reflection I have come to question whether the vision statement developed by the SBNMS SAC is attainable without reform of fisheries management throughout the region. All of the adverse fishery interactions which you identify (egs. mammal entanglement, age structure truncation and localized forage depletion) are endemic to the region and require regional solutions. They are products of a system which adheres to input proxies for mortality control, stock range scales as condition criteria, and virtually ignore capacity rationalization as a management tool.

I question as well, whether the bureaucratic canards of interagency cooperation and memoranda of understanding taken in isolation will substantially advance the reform which we both seek.

Fishery management must be reformed in conjunction with any major changes to fishing opportunity within SBNMS.

The fishing industry is beset with multiple layers of inefficiency derived from an input based management system. This approach has benefited neither fish stocks nor fishermen as exemplified by high incidence of overfished stocks, lagging yield, and inadequate reinvestment within the industry.

Closing significant portions of the Sanctuary to fishing will have consequences which extend far beyond its geographic boundaries. The 60 NM long barrier imposed by the WGOMCA and the reduced opportunity caused by the frequent seasonal closures of most inshore areas may well place groundfish fishing businesses in small ports from

Gloucester to Provincetown below the threshold of economic sustainability. Days-as-sea have been reduced twice since 2004 and another substantial cut is expected in 2009. Differential counting throughout the western Gulf of Maine and off Cape Cod has further eroded opportunity to the point where acquiring additional permits or leasing days at considerable cost are a requisite for survival.

The groundfish fishery simply cannot withstand any additional unilateral restrictions which further diminish economic viability. For any changes in fishery policy to be palatable, they must be developed in conjunction with the NEFMC and must extend beyond the Sanctuary boundaries. The concept of conservation through inefficiency must be replaced by one of stewardship for both the Sanctuary waters and beyond.

Although the draft plan report paints a dire picture of the condition of Sanctuary resources it proposes relatively modest immediate regulatory changes, i.e. an exclusion zone around the historic shipwrecks and a prohibition on developing a fishery for sand lance. In my opinion neither of these proposed changes are antagonistic to sustainable fishing practices. In fact, I believe that an industrial fishery for sand lance, as it occurs in the North Sea, would diminish existing opportunities for existing small scale fisheries and whale watching.

However, I find the most important and significant element in the document to be the eleven action plans which are presented on pgs. 178-254. These, I believe, can provide the basis for a broader vision, a second look at the relationship between fisheries and the habitats and ecosystems upon which they rely.

I am particularly drawn to the Ecosystem Based Sanctuary Management (EBSM) action plan as a potential catalyst for understanding, cooperation and constructive change. Section 3.3 identifies research programs which serve as precursors to a transition from stock-specific to ecosystem based management policies. I note with satisfaction reference to the Massachusetts Fishermen's Partnership (MFP) as a resource in this endeavor. The MFP continues to provide leadership in identifying and developing areas of common interest between the fishing industry and management authorities through science based projects.

It is my firmly held opinion that the objectives of the SBNMS and the fishing industry are not intrinsically exclusive. The industry has three primary objectives: (1) access to fish, (2) maximum sustainable yield, and (3) efficient operations. These need not be antagonistic to the Sanctuary's mission of conserving, protecting, and enhancing biological diversity, ecological integrity, and cultural legacy. However, for the relationship to function there must be continuing dialogue. A prominent and substantive element in the process should be cooperative scientific research.

In conclusion, any consideration of regulation of commercial fishing by the SBNMS is not a trivial matter. Simply layering additional restrictions upon the plethora of input controls already in place will bankrupt those sectors which depend heavily on Sanctuary

waters, including ports in a crescent of coast from Cape Ann to Provincetown where fishing has been a presence for over three hundred years.

Such an eventuality would deal a devastating blow to the character of affected communities, especially the preservation of working waterfronts. It would impact local economies and destroy the life assets of families. Perhaps most significantly, it would deprive the people of an important and healthful source of food at a time when the availability, cost, and safety of food is a growing concern. In reality, the challenge facing the SBNMS as it develops this management plan is far more formidable and complex than merely fencing off a gated community and leaving the surrounding world to fend for itself. Ecosystems are larger than your boundaries. Virtually every organism within the Sanctuary depends in part, on conditions beyond as well as within your political border. Whether the next five year management plan review cycle finds you still mired in an unproductive status quo or making substantive progress depends in no small part on how you meet the challenge.

**RECEIVED**  
6/19/08

June 17, 2008

**Brian T. Holmes  
86 Steven Rd.  
Marshfield MA.  
02050**

**Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066**

To Whom it may concern,

This plan (Draft Management Plan) is nothing more than a Government land/power-grab. What "crisis" was the genesis for this ridiculous plan? A plan that amounts to the Government, through NOAA telling people what, where and when they can enjoy themselves or make an honest living. It amounts to nothing more than unelected, unaccountable bureaucrats stifling the freedoms and commerce that made this country.

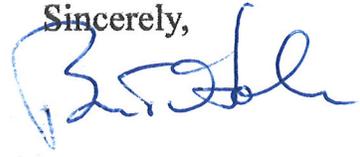
I am angry as hell but as usual people have been fooled into thinking that they're doing it for "the Children". Well maybe the children of the hundreds of government workers who will no doubt be employed to administer this monstrosity.

Can you imagine? Declaring an old mud scow an historic landmark? To save our heritage you say? I say it's because the Governments reason for being is to grow. And without control there can be no growth. After all, you're going to need people to see to it that the Proletariat comes groveling to someone if they want to visit and view their history. And let's not forget the hefty fee that You'll need to impose. Oh sure, you say that volunteers monitor the sites and the speed limits will be voluntary. How long do you think that will last? At the very first incident of "catastrophe", say a boat strikes a whale in poor visibility or a wreck gets "damaged" (can you imagine, something getting damaged while sitting at the bottom of the sea?). No matter, the hysteria will ring forth and a hue and cry will emanate for full time monitors (paid of course) and mandatory speed limits which will be enforced with the strictest of fines!

There's no doubt in my mind. In order to enforce Management Plan, people are going to suffer. Commercial Fisherman, Divers, Sport Fisherman or all of the above.

11/11/11  
11/11/11

Sincerely,



Brian T. Holmes

RECEIVED  
6/23/08

JOHN M. STELLA  
PO BOX 543  
BEDFORD, MA. 01730

PUBLIC COMMENTS  
STELLWAGEN BANK  
NATIONAL MARINE SANCTUARY  
175 EDWARD FOSTER RD.  
SCITUATE, MA. 02066

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JUNE 20, 2008

DEAR SIR :

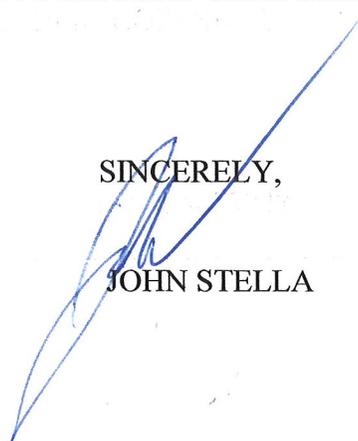
I WOULD LIKE TO SUBMIT MY PUBLIC COMMENTS ABOUT  
STELLWAGEN BANK .

THE WHALE WATCHING COMPANIES SHOULD CONTINUE  
WHALE WATCHING PROGRAMS FOR THE PUBLIC TO VIEW WHALES ON THE  
MASSACHUSETTS BAY, GULF OF MAINE, AND STELLWAGEN BANK AREAS.  
THIS IS PART EDUCATIONAL PROCESS FOR THE PUBLIC TO LEARN ABOUT  
WHALES IN THE OUTER SEAS.

ALL SHIPPING LANES CAN GO IN AND OUT OF  
MASSACHUSETTS BAY AND STELLWAGEN BANK .

WE MUST FIND IF ANY OF DOWNED SHIPS AT THE  
BOTTOM OF THE OCEAN FLOOR TO LEARN ABOUT HISTORY THAT MAY  
FIND.

SINCERELY,

  
JOHN STELLA

Superintendent Craig MacDonald  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
7/7/08

Dear Superintendent MacDonald:

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally significant ecological values. Yet, today Stellwagen Bank Sanctuary is under severe pressure from almost all of the same environmental impacts that affect the rest of New England's federal ocean waters and the draft management plan proposes no real protections for ocean wildlife or their habitat.

Much has changed since the Stellwagen Bank Sanctuary was designated in 1992. There is increased understanding of the profound impact that overfishing and habitat damage have had on the entire Gulf of Maine region, including Stellwagen Bank. The impacts of global climate change are creating a suite of new stresses that add to the degradation already occurring in the Gulf of Maine.

Commercial shipping traffic and commercial fishing vessels pose significant threats to the North Atlantic right whales. The North Atlantic right whale, the endangered humpback whale and the 20 other marine mammals that use Stellwagen Bank Sanctuary need to be protected from ship strikes, depletion of their forage base, entanglement from fishing gear and other serious disturbances.

Less than 3% of New England's commercial fish catch comes from the Sanctuary but the impacts of commercial fishing – particularly bottom trawling – and the lack of protected habitat have degraded the Sanctuary so much that even the proposed management plan recognizes: "...fishing – especially commercial fishing – impacts and pressures every resource state in the sanctuary. On an annual basis, virtually every square kilometer of the sanctuary is physically disturbed by fishing." Protecting ocean habitat should be a priority.

In addition to producing a strong rule that reduces ship strikes on endangered whales, NOAA should develop a final management plan and restoration strategy for Stellwagen Bank National Marine Sanctuary that:

- properly manages all commercial and recreational activities inside the Sanctuary;
- immediately identifies and protects the most vulnerable habitats from bottom trawling and other harmful human activities;
- prohibits commercial fishing of forage fish such as sand lance and herring to ensure this critical food supply is available for marine mammals, fish and seabirds;
- improves the monitoring and protection of water quality;
- better manages shipping, fishing and site seeing charter boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young;
- develops an open and honest dialogue with fishermen, whale-watch operators and other users to work together to manage the sanctuary for future growth *and* ecological abundance; and
- inventories and protects maritime heritage sites.

Stellwagen Bank can no longer be a Sanctuary in name only. I expect real leadership and urge you to craft an effective management plan that will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Sincerely,



Alex Hassinger

**KEVIN B. COYLE**  
46 Pleasant Street  
East Longmeadow, MA 01028  
(413) 525 1314

July 3, 2008

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7/7/08

Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

RE: Comments on Draft Management Plan

To Whom It May Concern:

I am an active recreational diver. I dive most weekends in the Salem/Cape Ann area on the various area wrecks, or for lobsters and scallops, or other sites which offer opportunities to view interesting marine life. Sometimes I dive from a private vessel with friends, other times I dive from a dive charter boat. As a recreational diver, I do not exceed a depth of 130 feet, the depth which all certifying agencies consider to be the maximum safe depth for recreational divers without special training and equipment as technical divers.

I have never dived in the SBNMS, and do not know if I ever will. While some 15% of the SBNMS is within recreational diving depth limits, it is still relatively deep, which dictates short dives for recreational divers. As pressure increases with depth, the volume of air required to fill human lungs also increases. If all other variables, i.e., exertion, are equal, a diver at 99 feet will consume air at twice the rate that same diver would consume at 33 feet. A further complication is that even relatively short dives at these depths can require a decompression stop at a shallower depth to allow accumulated nitrogen in the blood to dissipate before surfacing, and a longer minimum interval between dives. For recreational divers using a single tank (the vast majority) this means that most dives in the SBNMS will have a maximum dive time of 20 minutes or so. Most recreational divers will want something significant to see, such as a viable wreck or some noteworthy or profuse marine life to venture well offshore for such a short dive. Not many recreational divers will bother going so far or so deep to see a sandy, featureless bottom. They can see that much closer to shore at shallower depths. My point? Unless some interesting wrecks, or spectacular marine life are available at 130 feet or less, I do not think many recreational divers will be diving in the SBNMS.

Conversely, properly trained and equipped technical divers can safely make lengthy dives in excess of 250 feet. These divers have invested much time and money in extensive training and sophisticated equipment such as closed circuit rebreathers, diver propulsion vehicles (scooters), and specialized gas mixtures. New England technical divers are typically trained to penetrate wrecks. The technical divers I know are all intensely interested in the history of the wrecks they visit and in

preserving/conserving those wrecks.

There is no need to exclude divers from SBNMS wrecks. Rules should be promulgated regulating and/or prohibiting artifact collecting and other activities detrimental to the wrecks. Divers as a group are responsible and will follow the rules. They do not need to be excluded from or "supervised" on sensitive wrecks. This is especially true of SBNMS wrecks which because of depth and distance offshore will normally be visited only by technical divers who share the desire to preserve historic wrecks. Dozens of wrecks lie in Massachusetts waters subject to the Massachusetts Board of Underwater Archaeological Resources (BUAR). The BUAR has promulgated regulations which rely, successfully, on voluntary compliance by divers. A similar system will work for the SBNMS. Many other states have such systems which function successfully. After appropriate study, perhaps some wrecks may be determined to lack historical significance and artifact collecting can be permitted, as the BUAR has done.

I believe that most SBNMS wrecks are sufficiently far from shore that most divers will use a dive charter to dive them. It will take a spacious, seaworthy vessel to safely transport divers, especially technical divers with their extensive equipment, to SBNMS offshore dive sites. Dive charter operators can be relied upon to vigorously enforce SBNMS regulations, just as they enforce lobster and shellfish regulations, to protect their access to the wrecks.

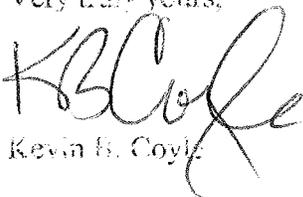
A system of mooring buoys set by the SBNMS on wrecks would provide multiple benefits. It would eliminate potential damage to wrecks caused by dive boats anchoring on, or tying off on the wrecks. Perhaps more importantly, such buoys could be a visible marker of a "No Fish Zone", whereby fishing would be prohibited within a specified distance of the buoys. This would protect the wrecks from the activity that everyone knows is the greatest threat, commercial fishing.

All divers should have full access to SBNMS wrecks. For reasons discussed above, I expect that there are relatively few divers interested or able to dive SBNMS wrecks now, or for the foreseeable future. Any management system, especially a permit system, which allows access to some divers and prohibits others, is unnecessary, will add administrative costs and inevitably invite allegations of favoritism. If it ultimately turns out that the SBNMS attracts swarms of divers, inconceivable in my opinion, then management options can be considered.

While I may never dive in the SBNMS, I believe I should have that option.

Thank you for your consideration.

Very truly yours,

  
Kevin B. Coyle



RECEIVED  
7/21/08

**The Commonwealth of Massachusetts**  
William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

July 14, 2008

Craig MacDonald  
Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

RE: Stellwagen Bank National Marine Sanctuary Draft Management Plan and Environmental Assessment. MHC #RC.44673.

Dear Mr. MacDonald:

Staff of the Massachusetts Historical Commission (MHC), the Office of the Massachusetts State Historic Preservation Officer (SHPO), have reviewed the Draft Management Plan (MP) and Environmental Assessment (EA) for Stellwagen Bank National Marine Sanctuary. The MHC has interest in the protection and appropriate management of historic cultural resources in the sanctuary, and is a consulting party in undertakings that require review in accordance with 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act. The MHC supports NOAA in its goals of identification, evaluation, and consideration of effects of activities within the sanctuary. NOAA staff have achieved important milestones in identification, evaluation, and public education initiatives and have developed a useful proposal with a schedule to further implement these important goals.

The draft MP/EA takes into account the presence of some known and expected significant historic resources within the sanctuary. The likely presence of ancient period, Native American archaeological sites is predicted. MHC encourages NOAA to have a comprehensive archaeological assessment survey undertaken using remote sensing technology and representative core sampling to locate, identify, and characterize areas within the sanctuary that contain intact ancient land surfaces that may be buried under later marine sediments or possibly exposed on the seabed in eroded areas. The location, identification, and evaluation of historic period archaeological resources continues within the sanctuary. Historic resources are typically located on the seabed or buried in relatively shallow marine deposits. Assessments of effects to the historic resources focus predominantly on direct, adverse impacts of fishing activities within the sanctuary. Potential direct impacts from recreational SCUBA diving are also considered.

The draft MP/EA describes some of the legal authorities, particularly the sanctuary regulations that NOAA should be applying now to avoid adverse effects of fishing activities and recreational SCUBA diving on important historic resources that are part of the public trust and its patrimony. Consideration of potential effects to ancient period land surfaces that may contain significant evidence of Paleoindian to Early Archaic occupation and land use is difficult because areas within the sanctuary that are likely to contain these resources have not yet been identified.

MHC encourages continued comprehensive professional survey to locate, identify, and evaluate historic period resources is important for both management and consideration of effects for specific undertakings proposed within the sanctuary. Significant National Register-listed and potentially National Register-

eligible shipwrecks, and archaeologically sensitive areas with intact ancient land surfaces should be incorporated into protected buffer zones where no bottom impacts are allowed. The draft MP/EA notes that historic period shipwrecks are also the location of important biological species, so that protection of the sanctuary's cultural resources also protects other significant sanctuary qualities.

A notification system for SCUBA diving, requiring public education on the principles of archaeological resource conservation, could be considered to manage these activities and prevent violation of archaeological resource protection laws and sanctuary rules. Unobtrusive underwater regulatory signage could be considered at known sites.

The draft MP and EA (page 129) should include and describe additional relevant legal authorities. The Archaeological Resources Protection Act of 1979 as amended (16 U.S.C. 470aa-470mm) can be applied for archaeological research projects as well as enforcement of damage and collecting at archaeological sites on federal property. Section 110 of the National Historic Preservation Act of 1966 as amended (16 U.S.C. 470h-2(a)) provides for the inventory, evaluation, and nomination of properties to the National Register of Historic Places that is ongoing in the sanctuary. Note also that the implementing regulations of Section 106 (36 CFR 800) also require notification and consultation with consulting parties such as the SHPO, Tribal Historic Preservation Officers, and the Massachusetts Board of Underwater Archaeological Resources (BUAR). MHC also has interest and expertise in archaeology and historic preservation, and must be consulted in the development of proposed scopes for identification and evaluation surveys for cultural resources undertaken in advance of implementing the surveys for Section 106 undertakings. MHC maintains an archive of archaeological reports, and as reports required for Section 106 compliance projects are required, MHC would greatly appreciate receiving copies of technical reports of archaeological investigations conducted for the sanctuary for research and Section 110 compliance projects.

NOAA staff have initiated important and welcome outreach to the BUAR and dissemination of the NOAA staff findings to the broader professional archaeological and historical community in Massachusetts. Varied and interesting public educational programming has been sponsored at multiple locations. The sanctuary has sponsored many events for Massachusetts Archaeology Month coordinated by the MHC. These vital programs that increase the public appreciation of the sanctuary should continue and expand as staffing and funding allow. Additional funding for public education could be sought through royalty and lease payments and financial mitigation programs for offshore development projects near the sanctuary some of which funds are channeled through Minerals Management Service.

These comments are offered to assist in compliance with Sections 106 and 110 of the National Historic Preservation Act of 1966 as amended. Please contact Edward L. Bell if you have any questions or need more information.

Sincerely,



Brona Simon  
State Historic Preservation Officer  
Executive Director  
State Archaeologist  
Massachusetts Historical Commission

xc:

Deborah Marx, NOAA



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July 17, 2008

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7/31/08

Mr. Craig MacDonald  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

Please consider these comments on the Draft Management Plan (“DMP”) from the Ocean Conservancy on behalf of our staff and our members.<sup>1</sup> Ocean Conservancy has been committed to Stellwagen Bank National Marine Sanctuary (“SBNMS”) since advocating for its 1993 designation, opening its New England office in 1999 and serving as an active conservation member of the Sanctuary Advisory Council (“SAC”) since 2001 (including election as SAC Secretary, Vice Chair and Chair since 2002). Ocean Conservancy is also active at other Sanctuary sites in Florida, California and Hawaii, and at the National Program through advocacy and constituent outreach. Ocean Conservancy staff and members participated in and submitted comments during the Management Plan scoping period; Ocean Conservancy staff served on five of the twelve Working Groups during the Management Plan Review (“MPR”) including chairing the Compatibility Determination Working Group. These comments are offered from the perspective of a lengthy and intensive commitment to SBNMS and the National Marine Sanctuary System, and desire that it achieve its’ potential under the National Marine Sanctuary Act (“NMSA”) to truly be a New England maritime crown jewel.

Over the years, Ocean Conservancy has vigorously asserted for years a key statement in the DMP: in order to be meaningful as a designated Sanctuary, SBNMS should provide more protection to resources within its boundaries than other parts of the ocean.<sup>2</sup> We support and endorse the DMP’s detailed assessment of Sanctuary resources as being adversely impacted by a number of human activities and the Sanctuary’s commitment to biodiversity conservation. However, we are greatly disappointed that the DMP proposes absolutely no regulatory changes to protect these impacted resources, and further disappointed that it has taken ten years to produce a plan with no immediate action.

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<sup>1</sup> Ocean Conservancy has over 10,000 members in New England states including more than 4,000 in Massachusetts, and over 210,000 nationwide including participants in our Ocean Action Network.

<sup>2</sup> “In managing for biodiversity conservation, the authorities and protection measures afforded by all relevant statutes should be brought to bear on solving the problems described in this DMP. Given the unique roles that sanctuaries can play in overall resource conservation and management, it is reasonable to anticipate that the DMP would advocate for a higher level of conservation of living marine resources in the Stellwagen Bank sanctuary than may apply broadly throughout the whole Gulf of Maine.” Page 28, SBNMS DMP, April 2008.



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In summary:

- Ocean Conservancy supports the adoption of the SAC vision statement for the Sanctuary;
- Ocean Conservancy supports the focus in the DMP on biodiversity conservation and a strong role for the Sanctuary in managing resources within its boundaries;
- Ocean Conservancy supports the conclusions in the DMP regarding the status of Sanctuary resources;
- Ocean Conservancy does not support the proposed incremental 5-year implementation of management measures; specifically, Ocean Conservancy believes that immediate action is necessary to address the resource issues substantiated in the DMP.

#### Role of SBNMS within the Gulf of Maine

SBNMS occupies a unique position in the Gulf of Maine. As the only National Marine Sanctuary in a region defined by its marine resources and coastal heritage, SBNMS can best achieve the intent of the National Marine Sanctuary Act when its mission is clearly understood by stakeholders as well as decision makers and its role in managing the resources within its boundaries well-defined. Yet SBNMS is not well-known, nor is its mission as a well-managed marine protected area well understood. In fact, closed areas established by federal fisheries managers are currently better known as protected areas, and indeed provide more biodiversity conservation in the Gulf of Maine than SBNMS.<sup>3</sup>

In the wake of the reports issued in 2003 and 2004 by the Pew Oceans Commission, the Massachusetts Ocean Task Force and the U.S. Commission on Ocean Policy, it is clear that marine protected areas such as national marine sanctuaries are a critical part of our nation's sustainable maritime future. SBNMS has the opportunity in its revised management plan to not only meet the requirements of the NMSA but to serve as an example of innovative management in integrated ecosystem based approaches, biodiversity conservation, and increased stakeholder stewardship.

The management plan review process has successfully helped to raise the visibility of SBNMS and to put forward a key question: what should this Sanctuary in the Gulf of Maine be? Through scoping meetings, Working Groups, and intensive SAC involvement, hundreds of regional stakeholders confronted the science, law and socio-economic challenges posed by how active or passively the Sanctuary is managed to achieve conservation objectives. An important example of stakeholder focus on SBNMS' identity was the process by which the SAC 'vision' was developed.

For years stakeholders representing diverse interests have raised questions about what exactly the Sanctuary was: a highly protective area? a multiple use area? what is its' vision? This question became a central part of the deliberations of the Compatibility Determination Working Group, which recommended that the SAC hold a special meeting dedicated to this issue immediately, so that a draft vision could be incorporated into this DMP for public comment. The resulting vision, crafted and approved unanimously by the SAC in 2005, is a powerful commitment to the Sanctuary's conservation

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<sup>3</sup> *Marine and Coastal Protected Areas in the U.S. Gulf of Maine Region*, p. 68 (Ocean Conservancy, 2001).



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purpose, resulting from deliberate and often difficult discussions among stakeholders with different interests in Sanctuary resources and should be given great weight.<sup>4</sup> **Ocean Conservancy urges the official adoption of this vision statement as the guiding vision of the Sanctuary.**

However, much of that stakeholder engagement and momentum achieved during the 10-year planning process has dissipated due to the 2-year delay in releasing the DMP. It is difficult for stakeholders to follow such an extended process, much less participate in a meaningful way, and for the plan to be justified as still meaningful. **Ocean Conservancy strongly urges that future MPR processes be conducted in a more expedited fashion that takes advantage of stakeholder involvement and ensures that the resultant product is timely and relevant.**

#### Resource status

Ocean Conservancy supports the well-researched conclusions in the DMP regarding the status of SBNMS resources. The Sanctuary's peer-reviewed 2007 'Condition Report' laid important groundwork for the DMP in finding over half of all categories (10 out of 17 total) of Sanctuary habitat and living resources in fair through poor condition (on a scale of good-fair-poor). The DMP clearly states findings of extensive impact of human activities on Sanctuary resources and provides scientific support for these conclusions. The most significant single human impact in the Sanctuary is fishing, which impacts the individual species targeted, overall ecosystem structure, habitat and other species through bycatch and entanglement.<sup>5</sup> Marine mammals, animals that are the "identity" of the Sanctuary for many members of the public, are impacted by fishing activities reducing their forage base, entanglement in fishing gear, and vessel conduct which interferes with their feeding and communication activities and can cause significant, life-threatening injuries. Even marine heritage sites, high-value shipwrecks in the Sanctuary, are degraded by fishing activity.

Simply put, NOAA makes a compelling case that Sanctuary resources are in a degraded state and at immediate risk of further degradation. These conclusions have been extensively reviewed and are cited and referenced properly. **Ocean Conservancy supports the conclusions in the DMP that Sanctuary resources are being adversely impacted by human activities, especially fishing.**

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<sup>4</sup> "Stellwagen Bank National Marine Sanctuary is teeming with a great diversity and abundance of marine life supported by divers, healthy habitats in clean ocean waters. The ecological integrity of the sanctuary is protected and fully restored for current and future generations. Human uses are diverse and compatible with maintaining natural and cultural resources." Sanctuary Advisory Council, 2005.

<sup>5</sup> "On an annual basis, virtually every square kilometer of the sanctuary is physically disturbed by fishing . . . . The disturbances caused by fishing are chronic as well as extensive; they are repetitive and recurring rather than single impact events. Fishing impacts and puts pressure on every resource state in the sanctuary, whether it is biogenic seafloor habitats, marine mammals or shipwrecks. Fishing has removed almost all of the big old growth individuals among biologically important fish populations, reshaped biological communities and habitats in the process, and until recently, reduced fish species diversity and richness in the sanctuary." DMP, p. 168 (April, 2008).



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### Management goals and responses

One of the most important things the DMP does is clearly state NOAA's goals for managing SBNMS. As mentioned previously in these comments, questions about the identity and vision of SBNMS have been at the core of many stakeholder discussions about specific management issues over the years. Without a clear statement of purpose from the managing agency, it is difficult for stakeholders to engage in constructive conversations regarding specific management.

We particularly endorse the Sanctuary's commitment to biodiversity conservation.<sup>6</sup> This commitment by NOAA significantly clarifies the role of the Sanctuary within the Gulf of Maine and is in accord with the purposes and intent of the NMSA. We strongly support the Sanctuary's commitment to the protection and restoration of its biological communities; this is not only part of its mission under the NMSA and consistent with the findings of the Massachusetts Ocean Task Force, the Pew Oceans Commission and the U.S. Commission on Ocean Policy, it is imperative to ensure healthy marine ecosystems in light of increased human uses and the impacts of climate change.<sup>7</sup> In light of the Commonwealth of Massachusetts' recent commitment to developing a comprehensive plan in the next 18 months under the Massachusetts Ocean Act for state waters adjacent to the Sanctuary, it is particularly timely for NOAA to commit to comprehensive, ecosystem-based protection of SBNMS.<sup>8</sup>

**Ocean Conservancy supports NOAA's commitment to biodiversity conservation and protection and restoration of biological communities within SBNMS.**

The DMP clearly supports and states the need to change Sanctuary management.<sup>9</sup> The DMP also clearly supports the findings of the SAC Working Groups.<sup>10</sup> Yet the DMP contains no proposed changes to Sanctuary regulations, despite 10 years of intense deliberation, the detailed Action Plans and NOAA's own conclusions and prioritization of key issues. Rather, changes in management are suggested between now and 2013 for a 'whale watch program, maritime heritage program, forage base

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<sup>6</sup> "NOAA can and should play a powerful role in protecting this special marine area, increasing public awareness and support for marine conservation, and providing sites for research and monitoring. By changing public attitudes, improving scientific understanding and developing effective models for management, the sanctuary can extend its benefit well beyond the limit of its geographic boundaries. *Comprehending the great importance of marine biodiversity, and thereby gaining insights to interpret, explain and maintain ecological complexity, is the basis for marine resource management in the Stellwagen Bank National Marine Sanctuary.*" DMP, p. 26, April 2008 (emphasis added).

<sup>7</sup> "... the ultimate goal of sanctuary management must be the protection and restoration of its biological communities." DMP, p. 171, April 2008.

<sup>8</sup> "Massachusetts today became the first state in the country to embark on the ambitious initiative to create a single document to cover a myriad of ocean activities, from wind farms and ocean fishing to whale watching and environmental conservation." Associated Press, May 28, 2008.

<sup>9</sup> "This document provides background information necessary for managing the sanctuary for biodiversity conservation and clarifies the scale and scope of fishing and other activities in the sanctuary. The information provides a detailed picture of the present condition of sanctuary resources and the activities exerting pressure on them. There is now the basis to consider how *things should be done differently to improve sanctuary management, since that is what the findings indicate is needed.*" DMP, p. 173, April 2008 (emphasis added).

<sup>10</sup> "The action plans are based extensively on the advice of the Sanctuary Advisory Council working groups and these recommendations should be put into practice." DMP, p. 173, April 2008.



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management, habitat zoning and compatibility analysis.<sup>11</sup> This result is simply put, inadequate: insufficient to protect sanctuary resources and an incomplete response to stakeholders who invested significant energy in a 10-year planning process and expected a meaningful plan with agency commitment as a result. By deferring actions recommended by vested stakeholders and well-supported by agency research, NOAA is putting sanctuary resources at risk, confusing stakeholders who believed that the Plan itself would produce changes and will not have the interest or energy to follow numerous separate regulatory processes over the course of 5 years, and compromising the Sanctuary's standing with other agencies SBNMS must work with. We believe that by decoupling actual management actions from management plans and extending implementation in a piecemeal fashion, NOAA is undermining the value of the planning requirement of the NMSA and turning away from the comprehensive approach endorsed by the Pew and U.S. Ocean Commissions and approved by the Massachusetts legislature. **Ocean Conservancy does not support decoupling regulatory changes from Sanctuary management plans.**

Given the well-founded conclusions regarding the degraded state of the Sanctuary's resources and NOAA's commitment to biodiversity conservation within SBNMS, **Ocean Conservancy does not support the proposed incremental, extended implementation of management actions within the Sanctuary.** We believe the Sanctuary should revise its Final Plan to include regulatory changes in the following areas:

1. Establish regulations to regulate vessel speed and approach within the Sanctuary to protect marine mammals from behavioral disturbance;
2. Establish regulations to prohibit any fishery on sand lance within the Sanctuary;
3. Establish regulations to prohibit herring fishing within the Sanctuary.

SBNMS should actively utilize other avenues outside of the MPR process and Sanctuary-specific regulations to advance the Sanctuary's objectives. We encourage SBNMS to continue to work with other management entities and processes such as participating in NOAA's Atlantic Large Whale Take Reduction Team, actively engaging in the NEFMC Omnibus Habitat Amendment process, and requesting a Sanctuary herring apportionment in the triennial specification-setting process that could be incorporated in the next NEFMC herring plan amendment. For example, NOAA should specifically focus immediately on the Designated Habitat Research Area process within the NEFMC Omnibus Habitat Amendment. These areas are to consist of diverse habitat types within the Gulf of Maine to act as unexpected control sites for research, a purpose which is consistent not only with the goals of the NMSA, but with SBNMS' innovative research in the portion of a fishery closure ("the sliver") that overlaps with Sanctuary boundaries. Nominations for these sites will be taken through 2008 and we strongly encourage SBNMS to participate in this process. These other avenues are important but we believe in order for NOAA to manage SBNMS for a high level of biodiversity conservation in comparison to the rest of the Gulf of Maine, Sanctuary-specific regulations must be implemented, and

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<sup>11</sup> "... a suite of regulatory initiatives . . . *could* be considered." DMP, p. 6, April 2008 (emphasis added).



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## Ocean Conservancy

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are best proposed as part of the comprehensive package contained in the DMP, not as piecemeal programs over the course of the next 5 years.

Ocean Conservancy further supports immediate reactivation of the SAC Zoning Working Group. This Group has met only 3 times during the 3 years of its existence, despite being established by the SAC with the specific purpose of working independently of the MPR process to utilize the period during development of the Draft and Final Management Plans. The SAC considered the Group's charge from the Ecosystem Based Management Working Group (determine how to measure ecosystem integrity, assess current ad hoc zoning within SBNMS and whether it accomplishes ecosystem based sanctuary management, and make any recommendations to change zoning within the Sanctuary, including the use of no-take and highly restricted areas, necessary to achieve ecosystem based sanctuary management) too pressing to delay until the Final Plan and wanted the Zoning Working Group's efforts to move in parallel with ongoing work by the New England Fishery Management Council ("NEFMC") in developing their Omnibus Habitat Amendment. The results of this Group's deliberations will be a critical foundation for future Sanctuary action to protect habitat and manage uses within its boundaries, and should conclude in advance of the 2-year deadline proposed in the DMP. **Ocean Conservancy supports immediate reactivation of the Zoning Working Group and conclusion of their work by December, 2009.**

Ocean Conservancy supports the DMP's focus on the need for an appropriate Compatibility Determination process. NOAA will be in a strong position to act to protect SBNMS resources with a process that provides transparency and justification for management decisions. **Ocean Conservancy supports development of a Sanctuary Compatibility Analysis Process as an immediate priority within the Final Management Plan.**

### Conclusion

Ocean Conservancy and its members are committed to conservation of ocean resources. We believe that one of the very best tools to achieve that purpose can be in our National Marine Sanctuaries through implementation of the spirit and letter of the NMSA. We also are aware of the staff and financial resource issues that confront NOAA and SBNMS, and will continue to advocate for more funding for SBNMS and for the entire Sanctuary system. However, when a sanctuary such as SBNMS is a sanctuary in name only, resources suffer, the public is not engaged and the NMSA is not living up to its potential. The DMP provides an excellent focus on the increasingly important role of SBNMS and biodiversity conservation within the Gulf of Maine, supported by intense stakeholder engagement and thorough scientific research. Yet the DMP is incomplete without a commitment to act upon this focus. We call upon you to provide action, including regulatory changes, in the Final Plan, to fully realize your commitment to complete implementation of the NMSA in SBNMS.



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Sincerely,

Susan E. Farady, J.D.  
New England Regional Director

Cc:

Mr. Dan Basta, Director, National Marine Sanctuary System  
Mr. Reed Bohne, Northeast Regional Coordinator, National Marine Sanctuary System  
Senator Ted Kennedy  
Senator John Kerry  
Representative Bill Delahunt

RECEIVED  
7/23/08

**Ellen B. Wells**  
**4 C.C.I.A. Road**  
**South Bristol, ME 04568**  
e-mail: nepenthe@lincoln.midcoast.com  
telephone & fax: (207)644-1584

July 21, 2008

Superintendent Craig McDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent McDonald,

The recently released draft sanctuary management plan for The Gerry E. Studts Stellwagen Bank National Marine Sanctuary is totally inadequate to protect this sanctuary.

A final management plan for the Sanctuary needs to manage all commercial and recreational activities inside the Sanctuary; identify and protect seafloor habitats from harmful bottom trawling and other harmful human activities; protect herring and other critical forage fish; inventory and protect maritime heritage sites; and protect water quality.

I urge you to prepare an effective management plan that will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Sincerely,



Ellen B. Wells

RECEIVED  
7/29/08

Stellwagen

Dear Board Members,

I am a former full time fisherman, boat owner and captain of 30 years. I now own a shore side business and work in the fishing industry on the supply side with 6 men employed constructing various gear items for our scalloping and dragger fleet.

My last boat was sold to the buyback program in 1997. Stellwagen Bank was never important to me during my fishing career and very few boats from our region fished there, however, fishermen from all the ports around Cape Cod Bay and up to Cape Ann depend greatly on this area for their very existence. Many of these fishermen are my customers, so we are threatened indirectly. They are smaller vessels which in the winter season cannot venture much beyond Stellwagen Bank.

For the past 15 years, we have been fighting the environmental onslaught regarding commercial fishing. They have the last word on the fisheries councils and the majority vote. Fishermen are the real stakeholders in commercial fishing, but are the minority.

The fishing industry is presently in a rebuilding mode. Since 1994, the industry has lost over 90% of its former capacity. Taking into consideration the fuel prices and other expenses and closed areas, limited days, limited catch and stringent gear restrictions, there is no way the remaining commercial fishing effort could even come close to threatening fish populations on Stellwagen or any other place off New England ever again. The open fisheries of the 1970's and 80's will never take place again I assure you.

I find it appalling how commercial fishing is getting the blame for everything wrong connected with the ocean. You can't disturb the bottom and even wrecks now have to be protected! Mobile gear fishermen stay away from wrecks for fear of losing gear. When a wreck is located by one of these boats resulting in loss of gear, coordinates on the wreck is passed on to others so they can avoid it. Recreational fishermen, however, will target wrecks because the fish are plentiful around them.

Commercial fishermen have sacrificed and suffered tremendously these past 15 years and no one acknowledges their efforts. Yes there are discards, but why? Because today's regulations prohibits landing over a limited amount of most species, forcing discards. It would be in this country's best interest for national security reasons not to devastate the commercial fishing effort any further than the present level.

Mobile gear vessels have no incidences of whale conflicts, they tow and steam too slow to catch up with them and retract the gear when they finish the trip. This is a fact and should be pointed out by you instead of just leaving them into the general category of commercial fishing gear whale entanglement. It is also a fact that commercial shipping is responsible for most whale casualties by ramming. If you were able to slow these vessels down to about 10 knots when passing through the sanctuary, it would make a world of difference in this respect.

Together with Amendment 7 in 1994, vast areas of Georges Banks and the Great South Channel, known to fishermen as Closed Area 1 and Closed Area 2, have been closed to fishing and even expanded greatly.. They are not designated sanctuaries, so the general public does not hear too much about it. They only get fed a steady diet of propaganda of telling them how bad commercial fishing is and how decimated key fish populations are because of it. There is no mention of the fact that the closed areas mentioned above were the fisherman's most productive fishing grounds and how they are now herded into areas less supportive of fish population recruitment. Yes, I know from experience there is plenty of bottom out there that does not support sustainable amounts of fish ever. The fleet is forced to fish these areas against their better judgment and as a result low landings prevail.

The low landings in conjunction with old survey statistics and factual speculations, gives environmentalists fuel for their anti commercial fishing propaganda machine. This propaganda machine reaches the uninformed public who in turn swallows the information hook, line and sinker. The former uninformed individual now becomes anti fishing and will give money and support to the groups responsible to fight for their cause. It is a short sighted policy and undermines key food producing domestic industries!

The National Marine Fishery Service (NMFS) and New England Fishery Management Council (NEFMC) in my estimation made a mess out of current fishing regulations mainly because of interference and threats of lawsuits from groups like Oceana and Conservation Law Foundation supported by Pew. Amendment 13 is a direct result of law suits from such groups. These group's representatives and supporters now make up the majority of the board at NEFMC making it impossible for fishing interests to get a majority vote. Looking at names and titles on your board, I suspect much of the same.

The environmentalists should stick to their clean air, soil and water policy's, and leave fishery management to NOAA and fishing interests, the real stake holders! The economy of this country needs to keep key industries viable and efficient for the security and independence from outside influences. Commercial fishing being one such industry.

I urge you to have some compassion for the fishing industry and their need to keep Stellwagen an option in their right to exist within our community.



Reidar Bendiksen

Reidar's Manufacturing, Inc.

10 Water St.

Fairhaven, Mass. 02719



Fax'd  
RECEIVED  
8/1/08  
fax

VIA FACSIMILE: (781) 545-8036

August 1, 2008

Dr. Craig MacDonald  
Sanctuary Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Dr. MacDonald:

Thank you for the opportunity to provide the following comments on the Stellwagen Bank National Marine Sanctuary Draft Management Plan (Plan). The American Sportfishing Association (ASA) is the nation's recreational fishing industry trade association. ASA represents over 750 sportfishing manufacturers, retailers, and angler advocacy groups, as well as the interests of America's 40 million recreational anglers. ASA safeguards and promotes the social, economic, and conservation values of sportfishing in America which result in a \$125 billion-a-year impact on the nation's economy.

In New England (Maine, Massachusetts, New Hampshire, and Rhode Island) alone, approximately 567,000 saltwater anglers contribute nearly \$1.2 billion in total economic output a year. This includes over \$77.1 million in state and local tax revenues from recreational fishing, \$742.5 million in saltwater sportfishing retail sales, and over 13,000 jobs. These figures do not include the intrinsic culture values of recreational fishing and the \$600 million anglers directly invest every year through special federal excise taxes and import duties on fishing gear and boat fuel to enhance fish habitat and access through the Sport Fish Restoration Act. These economic and social benefits of recreational fishing in New England should be maintained.

ASA supports the open public comment process and applauds Stellwagen Sanctuary staff for following this model as the management plan is being revised. As with any good ocean resource management decision, discussions about measures that could potentially restrict public access to public resources must involve a transparent process, a solid scientific basis, and specific guidelines on implementation and monitoring. Therefore, while the sportfishing industry understands the desire for marine sanctuaries, it supports a regulation and management process that allows public input, evaluation and modification, and fair recreational fishing access.

ASA further supports the fisheries management process established under the Magnuson-Stevens Fishery Conservation and Management Act, whereby implementation is done by the regional fishery management councils. Therefore, any management proposals in the Plan should not

AMERICAN SPORTFISHING ASSOCIATION

225 REINEKERS LANE, SUITE 420, ALEXANDRIA, VA 22314 • 703-519-9691 • FAX: 703-519-1872  
WEB: WWW.ASAFISHING.ORG • E-MAIL: INFO@SAFISHING.ORG

Dr. Craig MacDonald  
August 1, 2008  
Page 2

challenge the New England Fishery Management Council's authority over the management of fish populations within the Stellwagen Bank Sanctuary.

The recreational fishing industry is dedicated to conserving marine resources and supporting conservation-based recreational opportunities. As a rule, recreational anglers generally have a minimal environmental footprint; they do not use or support destructive equipment or fishing practices. Therefore, with regard to Compatibility Determination in the Plan, ASA believes recreational fishing activities are consistent with the conservation goals of Stellwagen Sanctuary. Again, ASA supports the broad goals of sanctuaries regarding the conservation of marine resources. However, ASA does not support proposals that may seek to restrict or eliminate recreational fishing opportunities within sanctuaries without a scientific determination that supports such an action.

Additionally, the establishment of recreational fishing restrictions of any level within the Stellwagen Sanctuary should:

1. Be based on the best scientific information available;
2. Include criteria to assess the conservation benefits of the restriction;
3. Establish a timetable for review of the restriction's performance that is consistent with the purposes of the restriction; and
4. Be based on an assessment of the benefits and impacts of the restriction, including its size, in relation to other management measures (either alone or in combinations with such measures), including the benefits and impacts of limiting fishing-specific access to users of the area, overall fishing activity, fishery science and fishery and marine conservation.

ASA's goal is to protect the health of the ocean environment while maintaining sportfishing opportunity. These goals are not mutually exclusive. Recreational fishermen are conservationists first and are concerned about the health of the ocean environment. They also support ocean conservation without unnecessary closures to sportfishing. It is in the angler's self interest to conserve fish and sensitive marine habitat for our children, grandchildren and future generations.

Thank you for the opportunity to submit comments for the Stellwagen Bank National Marine Sanctuary Draft Management Plan. ASA looks forward to working with sanctuary staff on measures to protect the health of our nation's ocean resources. Please contact me at 703.519.9691 ext. 244 or [pdoerr@asafishing.org](mailto:pdoerr@asafishing.org) if you have any questions or need any additional information.

Sincerely,



Patricia A. Doerr  
Ocean Resource Policy Director

Sandra Levine  
95 So. Bear Swamp Rd.  
Middlesex, VT 05602

July 28, 2008

Superintendent Craig MacDonald  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/4/08

Re: STELLWAGEN NMS DRAFT MANAGEMENT PLAN COMMENT

Dear Superintendent MacDonald:

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally significant ecological values. Yet, today Stellwagen Bank Sanctuary is under severe pressure from almost all of the same environmental impacts that affect the rest of New England's federal ocean waters and the draft management plan proposes no real protections for ocean wildlife or their habitat.

Much has changed since the Stellwagen Bank Sanctuary was designated in 1992. There is increased understanding of the profound impact that overfishing and habitat damage have had on the entire Gulf of Maine region, including Stellwagen Bank. The impacts of global climate change are creating a suite of new stresses that add to the degradation already occurring in the Gulf of Maine.

Commercial shipping traffic and commercial fishing vessels pose significant threats to the North Atlantic right whales. The North Atlantic right whale, the endangered humpback whale and the 20 other marine mammals that use Stellwagen Bank Sanctuary need to be protected from ship strikes, depletion of their forage base, entanglement from fishing gear and other serious disturbances.

Less than 3% of New England's commercial fish catch comes from the Sanctuary but the impacts of commercial fishing – particularly bottom trawling – and the lack of protected habitat have degraded the Sanctuary so much that even the proposed management plan recognizes: "...fishing – especially commercial fishing – impacts and pressures every resource state in the sanctuary. On an annual basis, virtually every square kilometer of the sanctuary is physically disturbed by fishing." Protecting ocean habitat should be a priority.

In addition to producing a strong rule that reduces ship strikes on endangered whales, NOAA should develop a final management plan and restoration strategy for Stellwagen Bank National Marine Sanctuary that:

- properly manages all commercial and recreational activities inside the Sanctuary;
- immediately identifies and protects the most vulnerable habitats from bottom trawling and other harmful human activities;
- prohibits commercial fishing of forage fish such as sand lance and herring to ensure this critical food supply is available for marine mammals, fish and seabirds;
- improves the monitoring and protection of water quality;
- better manages shipping, fishing and site seeing charter boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young;
- develops an open and honest dialogue with fishermen, whale-watch operators and other users to work together to manage the sanctuary for future growth *and* ecological abundance; and
- inventories and protects maritime heritage sites.

Stellwagen Bank can no longer be a Sanctuary in name only. I expect real leadership and urge you to craft an effective management plan that will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Sincerely,

*Sandra Lewine*



# Three Bays Preservation, Inc.

*Preserve • Maintain • Protect*

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8/4/08

## Board of Directors

*William G. Gahagan*  
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*William I. Koch*

*Andrew F. Pesek*

*Lisa Rockwell*

*Frederick W. Wrightson*

August 2, 2008

Superintendent Craig MacDonald  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066  
sbplan@noaa.gov

Dear Superintendent MacDonald:

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## Honorary Director

*Joan Gill*

## Advisory Board

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*Edward S. Rowland*

*Margaret Rowland*

*Anthony A. Will*

## Staff

*Lindsey B. Counsell*  
Executive Director

*Judy Heller*  
Program Manager

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# Three Bays Preservation, Inc.

*Preserve • Maintain • Protect*

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Stellwagen Bank can no longer be a Sanctuary in name only. We urge you to craft a management plan that will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Sincerely,

Lindsey B. Counsell  
Executive Director

## Just A Note

To all concerned <sup>August</sup>  
~~3rd~~ <sup>3rd</sup> 2008

This past July we Sisters of Mercy heard a drastic report about life in the ocean. Am so amazed and hurt at the condition of our seas in general. A wonderful woman Deborah Cramer spoke to us 62 Mercy Sisters during our retreat, she was so tremendous and hopeful we could help in some way



RECEIVED  
8/6/08

## Just A Note

I am only one sister but I deeply care with all my whole being as to how I can be of service, as I am near Portsmouth and Hampton area. I also go to Maine to Augunguit in the summer. Please notify me as I can be of service-

Gratefully  
Sister Rachel  
Dumont  
I love the  
ocean



Ms. Melissa Renn  
1731 Beacon St Apt 222  
Brookline, MA 02445-5323

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/13/08

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

I urge you to revise the draft plan to contain the following in the final plan:

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Ms. Melissa Renn

Ms. Briana Wagner  
15610 National Pike  
Hagerstown, MD 21740-2138

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/13/08

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Thank you.

Sincerely,



Ms. Briana Wagner

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/13/08

Dear Superintendent MacDonald,

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Thank you.

Sincerely,



Mr. Louis Caputo  
1028 E 16th St  
Brooklyn, NY 11230-4404

RECEIVED  
8/14/08

Ms. Deb Faulkner  
711 W Mount Vernon St  
Lansdale, PA 19446-3405

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

I remember (long ago) being in an ocean liner and wondering how it was for the creatures of the sea, that our waste was dumped into their home. It's clear that what felt like a vast ocean at the time is now a struggling ocean. We need to care for our marine sanctuaries, to help those creatures.

An email from the Ocean Conservancy is prompting me to write to you in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. They inform me that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

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- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you for your action.

Sincerely,

*Deborah Foote Faulkner*

Ms. Deb Faulkner

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8/14/08

Mrs. Carolyn Arkison  
1409 W Glendale St  
Broken Arrow, OK 74011-6218

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

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Thank you.

Sincerely,



Mrs. Carolyn Arkison

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8/15/08

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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Thank you.

Sincerely,



Mrs. Kathryn Simmons  
1024 Brookhaven Dr  
Aiken, SC 29803-6105

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/15/08

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Thank you.

Sincerely,

  
Ms. Debbie Dillon  
6301 E Catalina Dr  
Scottsdale, AZ 85251-7014

Aug 11, 2008

RECEIVED  
8/15/08

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

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Thank you.

Sincerely,

  
Mark, AJ, Sydney and Reese Sennett  
1750 E Sagittarius Pl  
Chandler, AZ 85249-3732

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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8/15/08

Dear Superintendent MacDonald,

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Thank you.

Sincerely,

*Sharon Russick*

Ms. Sharon Russick  
2851 S Ocean Blvd Apt 4L  
Boca Raton, FL 33432-8405

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/15/08

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- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,

Miss Laura Dymkowski  
114 Fayette St  
Clinton, IA 52732-7112

Aug 12, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

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Thank you.

Sincerely,



Mrs. Susan MacDonald  
1246 Evergreen Dr  
Bridgewater, NJ 08807-1253

RECEIVED  
8/15/08

Joseph M. Varon  
244 Lindberg Street  
West Hempstead, New York 11552-2431  
E-mail: [jvaron613@aim.com](mailto:jvaron613@aim.com)

August 12, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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8/15/08

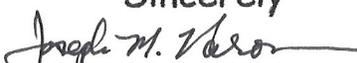
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2. Develop a zoning plan immediately with accompanying regulations that designate no-take research reserves and limited-use areas in addition to areas for commercial and recreational use.
3. Develop regulations to ban fishing on forage species such as sand lance and herring.
4. Officially adopt the proposed draft "Vision", as the Sanctuary's guiding vision

Thank you for your consideration. I look forward to hearing from you regarding this very important matter.

Sincerely

  
Joseph M. Varon, Past President

New York State Marine Education Association

Ms. Dawn Keur  
510 S Marion Ave  
Sandpoint, ID 83864-1151

RECEIVED  
8/15/08

MAILING: P.O. Box 55, Dover, ID 83825  
Phone 208-263-1573

Aug 12, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

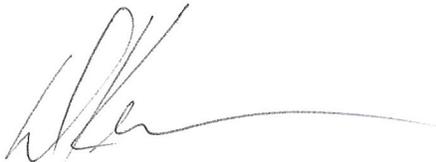
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- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Ms. Dawn Keur

Aug 12, 2008

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175 Edward Foster Road  
Scituate, MA 02066

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- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,

Ms. Kenna Gillette  
26031 Sombras Ct  
Valencia, CA 91355-3331

Mrs. Julie Kozel  
6490 Waverly Park  
Morrow, OH 45152-8489

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/18/08

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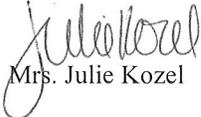
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Thank you.

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Mrs. Julie Kozel

Aug 11, 2008

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175 Edward Foster Road  
Scituate, MA 02066

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Thank you.

Sincerely,



Mr. Greg Simmons  
7111 Beach Dr SW  
Seattle, WA 98136-2077

Aug 11, 2008

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175 Edward Foster Road  
Scituate, MA 02066

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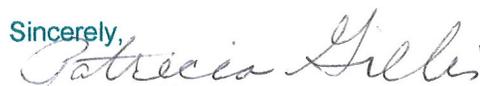
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Thank you.

Sincerely,



Ms. Patricia Gillis  
12 Clewes Rd  
Millis, MA 02054-1510

*Mr. Michael E. and Mrs. Madeleine van der Heyden  
1001 Miramontes Point Rd # 73  
Half Moon Bay, CA 94019-2321*

August 11, 2008

RECEIVED  
8/18/08

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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Thank you.

Sincerely,



Michael E. van der Heyden

&



Madeleine van der Heyden

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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8/18/08

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- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Mr. John Barthel  
1190 12th St SE  
Owatonna, MN 55060-4147

Aug 12, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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8/18/08

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Thank you.

Sincerely,

Mrs. Jennifer Valentine  
313 1st Ave  
Massapequa Park, NY 11762-1850

Aug 13, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/18/08

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I have visited Stellwagen and personally think it is one of the most beautiful places I have ever visited. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

I urge you to revise the draft plan to contain the following in the final plan:

- Shorten the whale watching hours and have a closed day once to twice a week to whale watching. Whale watching boats act as paparazzi, constantly harrasing the whales from sunrise to sunset. A day off from the noise and disturbance would benefit them.
- Develop regulations (such as greater distances between the whales and the boats) aimed immediately to reduce whale disturbance by all commercial and recreational vessels;
- Develop a zoning plan immediately with accompanying regulations that designate no-take research reserves and limited-use areas in addition to areas for commercial and recreational use;
- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

By protecting the Sanctuary it will continued to be enjoyed by whale watchers, fisherman, researchers and all for many more years to come. Moderation is the key.

Thank you for your consideration.

Sincerely,



Miss Shannon Conway  
444 Banyon Tree Cir Apt 104  
Maitland, FL 32751-5986

August 14, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/19/08

Dear Superintendent MacDonald,

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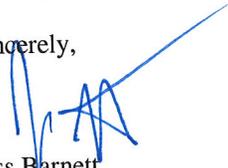
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- Officially adopt the proposed draft "vision" as the sanctuary's guiding vision.

Thank you.

Sincerely,

  
Jess Barnett  
51 Fulton St. Apt. 3  
Boston, MA 02109-1407

RECEIVED  
8/20/08

Ms. Donna Pfeffer  
429 S Seaview Ave  
Galloway, NJ 08205-9790

Aug 14, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

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Thank you.

Sincerely,



Ms. Donna Pfeffer

Aug 13, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/22/08

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Thank you.

Sincerely,

Mrs. Kalinke ten Hulzen  
Havenweg 3  
Wieringerwerf, None 1771 RW

*The Netherlands*



MARINE MAMMAL COMMISSION  
4340 EAST-WEST HIGHWAY, ROOM 700  
BETHESDA, MD 20814-4447

14 August 2008

Craig C. MacDonald, Ph.D.  
Sanctuary Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
8/18/08

Dear Dr. MacDonald:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the National Ocean Service's draft management plan and draft environmental assessment for the Gerry E. Studds Stellwagen Bank National Marine Sanctuary announced in the 6 May 2008 *Federal Register*. We offer the following comments and recommendations.

## RECOMMENDATIONS

The Marine Mammal Commission commends the Office of National Marine Sanctuaries for developing a thorough and well-documented assessment of sanctuary resources and threats and for identifying constructive actions to protect marine mammals and other resources in the Stellwagen Bank sanctuary. As discussed here, however, we do not believe that the proposed measures in the draft management plan adequately address the identified threats. Accordingly, the Marine Mammal Commission recommends that the Office of National Marine Sanctuaries—

- either (a) amend the current designation document to add commercial fishing and whale watching to the list of “Activities Subject to Regulation” (Article IV, Section 1) or (b) clarify in the proposed plan that, if warranted, commercial fishing and whale-watching activities will be subject to sanctuary regulation over the next five years;
- implement all of the research and management activities identified in the action plans for Ecosystem Alteration (Objectives EA 1 and 2), Marine Mammal Behavioral Disturbance, Marine Mammal Entanglement, and Marine Mammal Vessel Strikes that pertain to whale watching, commercial fishing, and vessel traffic;
- expand Objective MMBD.1 of the draft plan to include new regulations, permit requirements, or other measures as may be necessary for managing commercial and recreational whale-watching vessels in the sanctuary, including measures similar to the voluntary whale-watching guidelines adopted by the Service in 1999;
- consult with the National Marine Fisheries Service regarding activity 3.3.1 and implement a ban on all fishing for sand lance within the sanctuary;
- expand the list of activities under section 3.3 of the Ecosystem Alteration Action Plan to include a provision for implementing such regulations, permit requirements, or other measures as may be necessary to manage the impact of commercial fishing on natural and cultural resources within the sanctuary;
- identify and close one or more areas within the sanctuary to all commercial fishing to assess the potential for restoring habitats damaged by prior fishing activity and to provide a

- baseline for evaluating fishery impacts and potential fishery management actions in other areas;
- add a new action plan to the draft management plan section on capacity building to include a comprehensive Stellwagen Bank Sanctuary science plan; and
  - expand activity 3.3 of the Administrative Capacity and Infrastructure Action Plan to include efforts to share information on management experience and practice and, to the extent possible, to develop consistent management strategies on issues of mutual concern, such as whale-watching, vessel traffic, and entanglement in fishing gear, and assign this activity a high priority.

## RATIONALE

The draft management plan describes the natural and cultural resources, and the threats to those resources, in the Stellwagen Bank National Marine Sanctuary. Based on that information, it proposes a set of action plans to update the 1993 sanctuary management plan. The purpose of the plan is to provide a non-regulatory policy framework to guide sanctuary management until at least 2013. We recognize that the plan itself is not the appropriate vehicle for proposing regulatory measures. We assume, however, that it should identify those actions that sanctuary managers may need to take to accomplish the sanctuary's mission. According to the draft plan, that mission is—

to conserve, protect and enhance the biological diversity, ecological integrity, and cultural legacy of the (Stellwagen Bank) sanctuary while facilitating uses that are compatible with the primary goal of resource protection.

The Stellwagen Bank sanctuary covers 2,181 km<sup>2</sup> (842 mi<sup>2</sup>) of federal waters and submerged lands between Cape Ann and Cape Cod, Massachusetts, about 25 nmi east of Boston. Its boundaries encompass a diversity of benthic and pelagic habitats that are among the most biologically productive in the Gulf of Maine ecosystem. The draft plan notes that the bank's abundance of small schooling fish, particularly sand lance and herring, attracts seasonal aggregations of large whales and other marine mammals, and this was an important reason for designating the area as a sanctuary. At least 22 marine mammal species have been sighted in the sanctuary, which includes one of the most important feeding grounds for humpback whales and fin whales off the eastern United States. North Atlantic right whales also feed in the sanctuary and travel through it when moving to and from their principal spring feeding grounds immediately south of the sanctuary in Cape Cod Bay and the Great South Channel.

The draft plan provides a thorough review of marine mammals and other natural and cultural resources within the sanctuary, as well as a detailed, well-documented assessment of the threats to those resources. It concludes that 10 of 17 condition indices used to assess the status of sanctuary resources are now rated as only fair-to-poor due to intensive human activity and development, particularly commercial and recreational fishing and vessel traffic, within sanctuary boundaries. Among the 10 categories rated fair-to-poor, only one is thought to be improving, while the condition of three are rated as declining and six are rated as stable. This sobering assessment indicates that human activities within the sanctuary are impeding the recovery of depleted species,

the restoration of degraded marine communities, and the functioning of fundamental ecological processes (e.g., species reproduction and ecosystem energy flow). Despite this compelling conclusion, the draft plan states on page iii that "...at this time, NOAA is not proposing any regulations or changes to the Stellwagen Bank sanctuary designation document." The draft further notes that regulatory initiatives for activities currently unregulated by sanctuary managers, such as commercial fishing and whale watching, "*could be considered* for action prior to the next management plan review nominally scheduled for 2013." (Emphasis ours)

As we understand it, formal steps to adopt sanctuary regulations for activities not listed in the sanctuary designation document could not be initiated until at least 2013 unless another lengthy formal review comparable to the one for this draft management plan has been completed. That is, activities subject to sanctuary management and regulation first must be listed in Article IV, Section 1, of the designation document, a section entitled "Activities Subject to Regulation," and the next scheduled opportunity to revise the list would not occur until this plan is again updated in 2013 or later. Although the designation document currently lists the operation of any vessel and any activity that could take, remove, injure, or cause the loss of marine mammals or any other sanctuary resource as being subject to sanctuary management, it is not clear in the draft plan whether commercial fishing and whale watching are covered under that language. Thus, it is not clear whether sanctuary managers would be able to implement regulations for commercial fishing or whale watching under the existing designation document. Given that the primary goal of sanctuary management is to protect sanctuary resources—rather than merely to consider their protection—the decision not to modify the designation document may unreasonably preclude or delay the implementation of regulations for commercial fishing and whale watching pending their explicit addition to the sanctuary designation document.

As discussed here, information and analyses cited in the draft plan suggest that commercial fishing and whale-watching activities are—or have a high potential for—adversely affecting marine mammals and other resources that the sanctuary was established to protect. The draft management plan identifies useful and appropriate management standards that might be included in regulations, and the Marine Mammal Commission believes that the plan provides ample justification for proceeding with proposals to implement regulations for fishing and whale watching in the sanctuary before the next scheduled plan review. To clarify that sanctuary managers have authority to implement regulatory measures for fishing and whale-watching activities in a timely manner, the Marine Mammal Commission recommends that the draft plan be modified to either (a) amend the current designation document to add commercial fishing and whale watching to the list of "Activities Subject to Regulation" (Article IV, Section 1) or (b) clarify in the proposed plan that, if warranted, commercial fishing and whale-watching activities will be subject to sanctuary regulation over the next five years.

## **Whale Watching**

The draft plan notes that Stellwagen Bank is one of the world's premier destinations for commercial and recreational whale watching. In 2006, 18 to 23 vessels operated by 13 companies typically visited the sanctuary at least once each day during the whale-watching season. Those vessels generated several tens of millions of dollars in direct sales. The draft plan also notes that persistent

Craig C. MacDonald, Ph.D.

14 August 2008

Page 4

unregulated approaches by commercially and privately owned whale-watching boats can alter the resting, feeding, and nursing behaviors of the whales. In addition, it notes that, since 1980, whale-watching vessels have struck at least nine whales in and around the sanctuary. In 1999, following a record high of three strikes in the previous year (one of which resulted in a whale's death), the National Marine Fisheries Service adopted voluntary whale-watching guidelines for waters off the northeastern United States, including the sanctuary. Those guidelines recommend precautionary actions, such as reducing speeds near whales and limiting close approaches.

Compliance with those voluntary guidelines has been poor. The draft plan notes that whales in the sanctuary are sometimes closely surrounded by multiple privately owned whale-watching boats, contrary to advice provided in the guidelines, and at least two whales have been struck since 1999 when the guidelines were adopted. The draft plan also cites a recent study (Wiley et al. 2008), which found that 78 percent of commercial whale-watching vessels using the sanctuary failed to comply with recommended vessel speeds near whales. The draft plan concludes that the existing voluntary guidelines cannot be relied upon to reduce the risks to whales from whale-watching vessels and that regulatory measures appear warranted. This conclusion appears well supported.

The Marine Mammal Behavioral Disturbance Action Plan (Objective MMBD.1, pages 229–231) identifies measures to manage whale-watching vessels (e.g., identifying criteria for restricting vessel speed and approach distances, considering a permit program for commercial whale-watching operators, conducting a risk assessment for vessels operating near whales, and conducting research to improve understanding of whale-vessel interactions). The Marine Mammal Commission recommends that the Office of National Marine Sanctuaries implement all of the research and management activities identified in the Marine Mammal Behavioral Disturbance Action Plan (Objective MMBD.1) that pertain to whale watching. In addition, the Marine Mammal Commission recommends that the Office of National Marine Sanctuaries expand Objective MMBD.1 of the draft plan to include a new activity to implement regulations, permit requirements, or other measures as may be necessary for managing commercial and privately owned whale-watching vessels in the sanctuary, including measures similar to the voluntary whale-watching guidelines adopted by the Service in 1999.

## **Commercial Fishing**

The draft plan notes that the sanctuary was historically an important commercial fishing area and that it is still heavily exploited by fisheries using traps, sink gillnets, bottom trawls, mid-water trawls, and dredges. After centuries of fishing, the habitat and species composition within the sanctuary have been altered in ways that are poorly understood. The draft plan notes that recent landings from the sanctuary for all fisheries combined have averaged about 17–18 million pounds of fish and shellfish annually, with an additional 4 million pounds discarded each year as bycatch. Herring has made up about 40 percent of annual landings by weight (7 million pounds per year) although herring contributed only about 3 percent (about \$500,000) to the annual total ex-vessel landings value of \$15 to \$23 million per year since 2000. The bank also is heavily used for recreational fishing by charter boats, head boats, and private vessels.

The draft plan raises numerous issues regarding the effects of commercial fishing on marine mammals and other sanctuary resources. It notes that virtually the entire sanctuary is disturbed annually to varying degrees by commercial fishing. Much of the sanctuary is subject to fishing using trawl nets and dredges that first damage and then prevent the recovery of benthic habitat and communities. Although about 22 percent of the sanctuary on its eastern flank lies within an area that is closed to groundfish fishing and all fishing with bottom trawls, dredges, and set gillnets, that area is exposed to the effects of other types of fishing gear (e.g., traps and mid-water trawls) and does not include the range of habitat types observed in other areas of the sanctuary. In addition, no areas in the sanctuary have been set aside as controls to assess the recovery of species and marine communities in the absence of fishing.

The draft plan also notes that herring and sand lance are a primary food source for marine mammals, seabirds, and fish and that allowable catch limits on herring and sand lance may not adequately account for their foraging needs. The plan recognizes that the herring fishery is, in effect, a significant competitor for the resource and could reduce local herring densities to a level below that needed to trigger large whale foraging behavior. Although sand lance, a forage fish important to several marine mammal species, is not currently fished, the plan notes that such fishing could begin with no restrictions or management provisions in place and that a ban on development of such a fishery in the sanctuary appears warranted. In addition, the plan notes that whales may become entangled in gillnets or lines from traps and that the number of entangled whales observed in the sanctuary is high compared to other areas.

Proposed activities to address these issues are provided under action plans for Ecosystem Alteration (Objectives EA 2 and 3, pages 215–221) and Marine Mammal Entanglement (pages 240–245). Virtually all of the identified activities addressing fishery issues either involve further studies, public outreach efforts, workshops, working groups, and other methods to evaluate possible mitigation measures or consultation with the National Marine Fisheries Service on management measures that the agency might undertake. These provisions would be relevant and helpful, and the Marine Mammal Commission recommends that the Office of National Marine Sanctuaries implement all the research and management activities in the action plans for Ecosystem Alteration and Marine Mammal Entanglement that pertain to the impact of commercial fishing.

As a general matter, however, the identified measures do not provide assurance that the actions necessary to reduce the impact of fishing on resources in the sanctuary will be taken. For example, activity MA 3.3.1 calls on sanctuary management to “recommend that NOAA Fisheries Service consider implementing a permanent ban on the exploitation of sand eels (i.e., sand lance) within the sanctuary.” Such a ban appears to be well justified. Although we agree that sanctuary managers must consult with the National Marine Fisheries Service on any actions affecting fisheries, we do not believe it is appropriate for sanctuary managers to cede to the Service all final decisions on regulatory actions necessary to protect resources from fishing activities within the sanctuary. Although the Service clearly would have authority to implement such a regulation, it has neither the mandate nor the stated mission that the Sanctuary Program has for protecting the special assemblage of natural and cultural resources that gave rise to the Stellwagen Bank sanctuary designation. As a result, its view of the importance of such a rule may differ from that of sanctuary managers who are in a better position to consider its importance to the sanctuary’s mission.

Therefore, the Marine Mammal Commission recommends that the Office of National Marine Sanctuaries consult with the National Marine Fisheries Service regarding activity 3.3.1 and implement a ban on all fishing for sand lance within the sanctuary. In addition, the Marine Mammal Commission recommends that the Office of National Marine Sanctuaries expand the list of activities under section 3.3 of the Ecosystem Alteration Action Plan to include a provision for implementing such regulations, permit requirements, or other measures as may be necessary to manage the impact of commercial fishing on natural and cultural resources within the sanctuary. In this regard, the Marine Mammal Commission also recommends that sanctuary managers identify and establish areas within the sanctuary that would be closed to all commercial fishing to assess the potential for restoring habitats damaged by prior fishing activity and to provide a baseline for assessing fishery impacts and potential fishery management actions in other areas.

### **Vessel Traffic**

The draft management plan notes that designated shipping lanes in and out of Boston pass through the sanctuary and that large numbers of both commercial and recreational boats travel within or through the sanctuary. It also notes that marine mammals and other wildlife using sanctuary habitat are vulnerable to being struck by transiting vessels and to disturbance by vessel noise. The draft plan provides a thorough review of recent actions to address vessel strikes in and around the sanctuary. Proposed activities to address the vessel strike and noise issues are provided under action plans on Marine Mammal Behavioral Disturbance (MMBD 2 on noise impacts, pages 231–232) and Marine Mammal Vessel Strikes (Objectives MMVS 1–3, pages 235–239). Among other things, the action plans identify activities to develop a marine acoustics research program for assessing baseline noise levels in the sanctuary, review the adequacy of risk reduction measures implemented by the National Marine Fisheries Service, encourage voluntary year-round speed restrictions in the sanctuary, and support research to document ship strikes and develop technologies to prevent them.

The identified activities appear to be useful and appropriate. The Marine Mammal Commission recommends that the Office of National Marine Sanctuaries implement all of the research and management activities identified in the action plans for Marine Mammal Behavioral Disturbance and Marine Mammal Vessel Strikes that pertain to vessel traffic.

### **Scientific Research and Monitoring**

The draft management plan identifies a number of scientific research and monitoring activities under the various action plans to address capacity building, ecosystem protection, marine mammal protection, and maritime heritage. Identifying research needs related to key management issues is appropriate and helpful. From an administrative perspective, however, reconciling the large number of research needs identified in the document with limited staff and budget will be a difficult challenge requiring evaluation, prioritization, facilitation, and tracking of research activities. At present, it is not clear how the many research needs identified in the various action plans will be met. Given its importance to the sanctuary, a separate science plan should be developed to optimize returns on limited sanctuary funding and staff and to marshal cooperative efforts by other agencies and organizations. Therefore, the Marine Mammal Commission recommends that a new action plan

Craig C. MacDonald, Ph.D.  
14 August 2008  
Page 7

be added to the draft management plan section on capacity building to include a comprehensive Stellwagen Bank Sanctuary science plan.

### **Cooperative Efforts with the Dominican Republic**

Activity 3.3 of the Administrative Capacity and Infrastructure Action Plan identifies—and assigns a low priority to—an activity to develop and support an international exchange of people working on related education and research projects in the Stellwagen Bank Sanctuary and other marine protected areas. As described, this activity would involve the exchange of managers and volunteers working with a “sister sanctuary,” the Silver Bank Humpback Whale Sanctuary, in the Dominican Republic. Because the same humpback whales use habitat in both sanctuaries, the Commission believes that cooperative efforts with the Dominican Republic sanctuary to resolve shared management issues (e.g., the management of whale watching and vessel traffic), as well as shared education and research issues, would be particularly constructive and important. This could lead to a valuable precedent for cooperative and complementary international management of highly migratory marine species, such as humpback whales, that routinely move between protected habitats in different countries. Therefore, the Marine Mammal Commission recommends that the activity 3.3 of the Administrative Capacity and Infrastructure Action Plan be expanded to include efforts to share information on management experience and practice and, to the extent possible, to develop consistent management strategies on issues of mutual concern, such as whale-watching, vessel traffic, and entanglement in fishing gear. The Marine Mammal Commission also recommends that this activity be assigned a high priority.

I hope that our recommendations and comments are helpful. Please contact me if you or your staff has any questions.

Sincerely,



Timothy J. Ragen, Ph.D.  
Executive Director

### Literature Cited

Wiley, D.N., J.C. Moller, R.M. Pace III, and C. Carlson. 2008. Effectiveness of voluntary consent agreements: Case study of endangered whales and commercial whale watching. *Conservation Biology* 22(2):450–457.

Public Comment received by voice mail at 2:58 pm, Monday, 11 August:

"Eric Johnson calling from Duxbury. I understand that you are soliciting public comment about the use of Stellwagen.

I think that the whale watch boats should stay away from the whales cause I think that it's ridiculous how they approach the whales -- never mind individual parties -- you know these are big huge boats - you know you can't help but disturb them. That's the first thing.

The second thing is that the dragging -- I think that dragging should not be allowed on Stellwagen.

And the third thing is that, I think that we should be able to fish for striped bass out there without being criminals. You know.

Thank you very much. Bye bye"

7 Hutchins Rd  
Raymond, ME 04071-6745

RECEIVED  
9/5/08

Aug 29, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

I am a seabird ecologist and have been involved in marine studies and ecological research for two decades.

I have recently reviewed the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am extremely concerned that New England's only Marine Sanctuary provides practically no protection for the habitat and animals within its borders.

The document contains clear and compelling indications that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of food resources, and that human activity, particularly fishing, is compromising the very purpose of the Sanctuary. Yet, your proposed plan does absolutely nothing to increase protection.

The proposed action plans should include detailed regulatory proposals for immediate development and implementation, and I urge you to revise the draft plan to include the following actions:

- 1) Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision;
- 2) Develop regulations to ban fishing on forage species such as sand lance and herring;
- 3) Develop regulations immediately to reduce whale disturbance by all commercial and recreational vessels;
- 4) Develop a zoning plan immediately with accompanying regulations that designate no-take research reserves and limited-use areas in addition to areas for commercial and recreational use.

Please don't miss this opportunity to provide meaningful and lasting protection for the marine resources that the people of New England have been so dependent on, and so proud of, for centuries.

Sincerely,



Dr. Iain J. Stenhouse

288 Boynton Street  
Manchester, NH 03102-5073

RECEIVED  
9/26/08

September 24, 2008

Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Members of the Staff,

I am pleased to have an opportunity to respond to the findings reported in your Draft Management Plan Review. I appreciate the work that went into the draft and I have some concerns and recommendations that I wish to share with you.

I am concerned about the ocean wildlife and the ways that damage is being done to it by commercial fishing practices and some human activity. Specifically, the trawling gear is plowing over habitats, and large vessels are disturbing the marine life when they travel at high speeds. It is not possible for the fish to adequately feed their young and carry on their communication activities. I am also concerned about some whale watching activities where there are not adequate measures being taken to insure the safety and well-being of the animals.

I believe that aggressive steps should be taken to regulate vessel speed and approach within the sanctuary to protect marine animals. Your plan is to institute voluntary restrictions. I would recommend mandatory restrictions. I also support restrictions on herring fishing in the sanctuary in order to support a healthy ecosystem. Finally, I recommend that the rules for whale watching have strict enforcement.

A sanctuary should be a place where life can flourish, and it seems that is not the case presently on Stellwagen Bank. I applaud your work to improve conditions and encourage you to take bold actions to restore the environment for future generations of marine life.

Sincerely,



RECEIVED  
9-30-08

Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Members of the Staff:

Thank you for the opportunity to respond to the findings reported in your Draft Management Plan Review. You are to be commended for the time and effort given to this project.

I have three major concerns:

1. damage done to ocean and marine life by commercial fishing practices and human activity
2. disturbance of marine life by large vessels traveling at high speed
3. lack of adequate measures to curb the speed of vessels and to ensure the safety and well being of animals

I offer the following recommendations:

1. regulate vessel speeds by mandatory restrictions to protect marine life
2. restrict herring fishing in order to protect the ecosystem
3. strictly enforce rules for whale watching

Once again, I commend your efforts to improve conditions at the sanctuary and to restore the environment.

Sincerely,



Joanne Bibeau, RSM  
32 Grandview Avenue  
Watertown, MA 02472

Mary F. Griffin  
235 Mitchell St #2  
Manchester, NH 03103-6500



September 27 - 2008

Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Members of the Staff,

I am pleased to have an opportunity to respond to the findings reported in your Draft Management Plan Review. I appreciate the work that went into the draft and I have some concerns and recommendations that I wish to share with you.

I am concerned about the ocean wildlife and the ways that damage is being done to it by commercial fishing practices and some human activity. Specifically, the trawling gear is plowing over habitats, and large vessels are disturbing the marine life when they travel at high speeds. It is not possible for the fish to adequately feed their young and carry on their communication activities. I am also concerned about some whale watching activities where there are not adequate measures being taken to insure the safety and well being of the animals.

I believe that aggressive steps should be taken to regulate vessel speed and approach within the sanctuary to protect marine animals. Your plan is to institute voluntary restrictions. I would recommend mandatory restrictions. I also support restrictions on herring fishing in the sanctuary in order to support a healthy ecosystem. Finally, I recommend that the rules for whale watching have strict enforcement.

A sanctuary should be a place where life can flourish, and it seems that is not the case presently on Stellwagen Bank. I applaud your work to improve conditions and encourage you to take bold actions to restore the environment for future generations of marine life.

After carefully reading your Draft Management Plan Review, I strongly support each statement in each paragraph of this letter. I am 83 years old and spent my professional life as a teacher in the field of Biology. I sincerely believe that time is of the essence in restoring much of the destruction which we have inflicted on so many habitats which are essential to a rich variety of both plant and animal species. It is heartening that Stellwagen Bank National Marine Sanctuary exists in the Northeast. I plead with you to give serious and thoughtful consideration to each of these concerns and recommendations and 'TAKE BOLD ACTION' to restore the environment for future generations of marine life in as timely a fashion as possible.

Sincerely,  
Mary F. Griffin

115 Bradford Street  
PO Box 1036  
Provincetown, MA 02657

t 508 487.3622  
f 508 487.4495  
e ccs@coastalstudies.org

<http://www.coastalstudies.org>

**Provincetown  
Center for Coastal Studies**



September 30, 2008

Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
10/2/08

Subj: Draft Management Plan Comments

To Whom It May Concern:

Enclosed please find a letter from Margret Lohfeld proposing an "off-limits" area within the sanctuary as it relates to conflicts of whale and human activity.

I am forwarding the letter, which does not necessarily reflect the views of the Provincetown Center for Coastal Studies, at Ms. Lohfeld's request.

Sincerely,

A handwritten signature in blue ink that reads "Jan Young". The signature is written in a cursive, flowing style.

Jan Young  
Development Officer

RECEIVED  
10/2/08

Los Angeles  
Sept. 26 2008

Dear Friends at PCCS,

Referring to your article "Less than 1%...." on page 3 of PCCS's newsletter, Vol. 32, issue 2 on harassment etc. of whales — here's a story and an idea:

As a graduation gift to an Alaska Native student from a small village in Alaska (pop. 200) I invited that student to a fun-filled week on Maui, Hawaii, in May of this year. Through a local travel agent in Lahaina I tried to book a day of parasailing over the 'Au'au channel between Maui and Lanai which was advertised in an activities brochure. The agent told me that during our stay until later in May there would be no parasailing. He explained that whales that were in that area must not be disturbed by the boats to which the "parasailors" are attached. made sense to me. So, I booked a day of "ziplining" down the flanks of Haleakalā. That was the story leading up to my "idea":

How about setting aside an area where whales congregate frequently during certain

Page 2 of 2

times of the year and designating that area at specific times of the year "OFF LIMITS" for human activities (except for small vessels staffed with scientists, biologists and especially disentangling experts benefitting the whales)

In page 3 of your newsletter which I read with great interest it states: public comment period has been extended to Oct. 3. Hope my suggestion gets to you in time! I do not have a computer but I love to write.

With friendly regards,

Mrs. Margret Lohfeld



Mrs. Margret E. Lohfeld  
3425 Amesbury Rd  
Los Angeles, CA 90027

enclosed:

donation check for \$30.-



OCT 02 2008

38 Country Way • Scituate, MA 02066 • Ph: 781.545.9400 • Fax: 781.545.0477 • www.belsanbait.com

October 2, 2008

RECEIVED  
OCT 03 2008

To Whom It May Concern:

My name is Peter Belsan and I reside in Scituate, MA where I also own a retail bait and tackle shop; Belsan Bait and Tackle.

I am writing with regard to the management plan for the Stellwagen Bank Sanctuary. I strongly advise against any closures to both commercial and recreational fishing that are being considered by your organization. I believe closures of our fishing areas would be extremely detrimental to this community both emotionally and economically.

I firmly believe that you should take careful consideration of the opinions and values that those of us who have lived here on the South Shore of Massachusetts Bay for many years if not all our lives.

Remember, the people of our great country and their livelihoods and recreation is most important in this situation.

Yours truly,

Peter J. Belsan

September 11 , 2008

Stellwagen Bank National Marine Sanctuary  
Mr. Craig D. MacDonald  
175 Edward Foster Road  
Scituate, MA  
02066

RECEIVED  
10/3/08

Dear Mr. MacDonald:

After reviewing the current SBNMS draft management plan, I am opposed to all fishing restrictions and protection schemes proposed under the Heritage Maritime Action Plan (Appendix MHR.I – SBNMS Draft MHR Site Access Matrix lists).

The fact is that the wrecks of the Portland and the Palmer/Crary that rested on the sea floor for 110 and 106 years respectively being proof positive that your Action Plan and intervention are not required, unnecessary and only being introduced to confuse issues and to prevent recreational activities on Stellwagen bank.

Further, the plan to add 5 separate historical resources (by 2010) to the National Register of Historical Places (NRHP), which will then enable you to shut down five, one square nautical mile zones to bottom fishing, anchoring and general usage, is totally unacceptable (Referencing table 58. Performance measures for HMS Action Plan) as well as being against the original mission statement of the Gerry E. Studds Sanctuary.

I urge you to eliminate this plan and not interfere with the recreational enjoyment of the area, the wrecks have not been damaged as we all have shared with you during the recent public comment periods.

I also ask that you review the original intent of the SBNMS as defined under Gerry E. Studds mission statement. As proposed, your Heritage Maritime Action Plan will clearly shut down portions of the SBNMS to fishing and other activities against the original agreed mission of Mr. Studd's sanctuary plan which will require us to bring this conduct to Congress in Washington DC to stop you and your plan.

Respectfully Yours,



Paul Schwartz  
16 Kimberly Road  
Scituate, Mass. 02066

RECEIVED  
10/3/08

*fax*



International Fund for Animal Welfare  
1350 Connecticut Avenue NW,  
Suite 1220  
Washington, DC 20036  
Phone: 202-296-3860  
Fax: 202-296-3802

### Fax Cover Sheet

Date: October 3, 2008

Company: Stellwagen Bank National Marine Sanctuary

Attn: Dr. MacDonald

Fax#: (781) 545-8036 Phone# \_\_\_\_\_

From: Jeff Flocken Phone Ext: \_\_\_\_\_

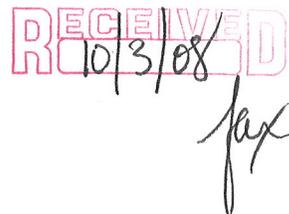
Email: JFlocken@ifaw.org DID# \_\_\_\_\_

Pages including cover: 8

Message:

October 3, 2008

Dr. Craig MacDonald  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066  
sbplan@noaa.gov



Dear Dr. MacDonald,

I write this comment on behalf of the International Fund for Animal Welfare ("IFAW") to submit comment on the Stellwagen Bank National Marine Sanctuary Management Plan. IFAW, with over 2 million supporters worldwide, is one of the world's preeminent international animal welfare organizations. IFAW works throughout the world to improve the welfare of wild and domestic animals by protecting wildlife habitats, reducing commercial exploitation and helping animals in distress.

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was created in recognition of its ecological and cultural value. This biological diversity is matched in few other places, and it is because of this diversity that the Sanctuary needs protection far beyond that which is presently afforded. The current Management Plan is a step in the right direction in some regards, but in others, it fails to achieve its mandated purpose. It repeatedly acknowledges major management conflicts within the Sanctuary and proceeds to do nothing about them. These problems need to be addressed now, not in five years when the next plan is released. As such, we respectfully submit these comments and ask that you give them consideration.

Several issues arise throughout the Management Plan. Many of them are of concern to IFAW and its supporters. Among our major concerns are:

- mitigating the negative effects of fishing on whale populations, particularly reduction of injury and mortality stemming from entanglement incidents
- reducing the likelihood of ship strikes
- mitigating harm to whales from ocean noise
- mitigating ecosystem degradation risks and the effects on several important species within the Sanctuary, specifically herring.

The National Marine Sanctuaries Act (NMSA) was created with the "primary objective of resource protection." 16 U.S.C. § 1431(b)(6) (2006). Human use facilitation is material only inasmuch as public and private use of these resources does not conflict with that primary objective. *Id.* This plan violates that statutory mandate by putting the interests of the fishing industry ahead of the sanctuary's biological resources.

The Management Plan should recommend full use of the powers granted by the NMSA. For example, instead of proposing ongoing research where resource threats have been identified, the Sanctuary Advisory Council should propose *regulations* first with research

and monitoring on its effectiveness. The NMSA provides that the Secretary of Commerce "shall revise the management plan *and regulations* as necessary to fulfill the purposes and policies of this chapter." § 1434(e) (emphasis added). Regulations to mitigate damage to sanctuary resources will fulfill the purposes of the NMSA much more effectively than unenforceable suggestions and voluntary compliance. Research continues to be an important tool where critical data is needed.

### **Take Stronger Action to Prevent and Remedy Marine Mammal Entanglement**

To reduce the risk and harm from entanglement, the Advisory Council has proposed three objectives and associated strategies. DRAFT MGMT. PLAN at 240. We applaud the first strategy, which is directed at aiding disentanglement efforts. *Id.* The second and third strategies, aimed at reducing marine mammal contact with trap and gillnet fishing gear, respectively, are problematic.

The Council plans on encouraging conversion to use of safer fishing gear within the Sanctuary, rather than the current, high-risk trap and gillnet gear. *Id.* at 242-44. The use of sinking ground line and lower breaking strength buoy links would reduce the risk of harm to whales and turtles within fisheries. However, the action plans encourage testing of other new fishing gear within the Sanctuary. *Id.* at 244. The desire to develop safer fishing gear is laudable. However, given the critically endangered status of the right whale, testing should only be allowed under highly regulated circumstances including seasonal prohibitions.

With respect to the use of sinking groundline, Massachusetts became the first state to require that all lobster pot trawls use sinking groundline within state waters. This requirement came about because of the successful fishing gear exchange project sponsored by IFAW, the Massachusetts Lobstermen's Association and the Division of Marine Fisheries. Because most of the lobstermen in the region already use sinking groundline, IFAW believes you should move forward quickly in imposing such a requirement throughout the Sanctuary. If a federally licensed lobsterman or any other type of pot fisherman wants to fish with trawls within Sanctuary boundaries then he should be required to use sinking groundline.

In addition to sinking groundline there are other gear modifications that should be explored such as breakaway weak links, the reduction or elimination of endlines as well as banning any wet storage of gear. The effectiveness of these measures should be investigated in conjunction with other ongoing gear research efforts being conducted by NOAA, IFAW, Sea Grant and others.

Entanglement of whales and other marine mammals in gillnets is a coastwise problem that occurs both inside and outside the Sanctuary. Pingers, weak links and other gear modifications have been partially successful in reducing entanglements although documentation of their effectiveness is difficult. IFAW supports continued research and investigation into these and other gear modifications that could reduce entanglements. This past year the National Marine Fisheries Service issued a contract to IFAW for the

development of a fishing gear marking device to hold data regarding the location and ownership of the gear and other pertinent information. Today when pieces of gear are found entangled around a marine mammal the gear rarely contains information to determine the type of gear, area fished, or vessel. In order to determine the effectiveness of existing whale-safe gear regulations and to help develop management measures in the future to reduce the risk of entanglements IFAW has funded two exciting research proposals looking into new technologies aimed at developing a marking system that identifies the gear type and location. Whatever fruits are born of this research, gear marking technology must be used within and in the vicinity of the Sanctuary to better evaluate entanglements.

As mentioned previously in the discussion on ecosystem alteration, strategies to limit the amount and type of fishing gear could include limiting the use of gillnets within the Sanctuary. Obviously a reduction in the use of gillnets would also reduce the likelihood marine mammal entanglement in fishing gear. Implementation of the Ecosystem Action Plan and the Marine Mammal Entanglement Action Plan must be coordinated as they are so closely linked. IFAW also supports efforts to improve and strengthen NOAA's large whale disentangling capacity to aid whales that become entangled in fishing gear.

### **Promulgate Clear Regulations to Prevent Ship Strikes**

The Sanctuary's ecological diversity and its proximity to Boston and other major ports makes it ideal for fishing and whale watching, private and commercial. Also because of its proximity to many New England seaports, the Sanctuary is consistently traversed by commercial shipping vessels. These uses are of major concern in the area, but they only play a role in decision-making compatible with the goal of resource protection. 16 U.S.C. § 1431(b)(6). Three action plans have been proposed within the Management Plan, DRAFT MGMT. PLAN at 235-39, and only one appears to be properly directed toward resource protection, rather than human use protection.

The protection of whales from ship strikes has been one of IFAW's highest regional priorities because the North Atlantic right whale population is severely endangered. Because the greatest known human induced cause of right whale mortality in the western North Atlantic is collision with ships IFAW has been particularly engaged in developing a comprehensive ship strike reduction strategy. Almost a decade ago IFAW employed a special maritime advisor to assist us in our efforts to protect right whales from ship collision. This former Coast Guard officer also served as a co-chair of the Ship Strike Committee of the Northeast and Southwest Implementation Teams for the Recovery of the North Atlantic Right Whale. The Committee made recommendations to NOAA back in August 2001 on operational measures that should be implemented to reduce collisions with ships.

Moreover, in June 1999 IFAW President Fred O'Regan joined the Secretaries of Commerce and Transportation in kicking off the first Mandatory Ship Reporting System (MSR) in Boston. At that time IFAW contributed almost \$70,000 to the Coast Guard for the start up costs of the MSR. IFAW's representative was one of the primary authors of

the MSR proposal to the International Maritime Organization (IMO) and served as a technical advisor to the US delegation to the IMO.

Because of this history IFAW is dismayed that NOAA has not yet finalized proposed regulations implementing operational measures to protect whales from ship strikes. Moreover, we believe the strategies proposed as part of the Marine Mammal Vessel Strike Action Plan are inadequate. While IFAW supports much of the suggested research and investigations into new detection technologies and the possible reconfiguration of the Traffic Separation Scheme (TSS) we oppose the voluntary and seasonal nature of the proposed speed restrictions. NOAA's own research indicates that vessels traveling at higher speeds have a much greater likelihood of striking and killing a whale. Moreover acoustic research is proving that whales are in and around the Sanctuary during times of the year when they had not previously been detected; an issue the aerial surveys have not successfully detected. Consequently IFAW supports a year round mandatory speed restriction of 10 knots for all vessels larger than 65 feet. For smaller vessels a higher speed limit (12-15 knots) may be more appropriate given their maneuverability and the lack of data showing that small vessels cause injury and mortalities.

With respect to vessels, NOAA should move aggressively in immediately establishing buffer zones around whales for all categories of vessels. To reduce harassment to whales, the Hawaiian Islands Humpback Whale Marine Sanctuary imposes a 100 yard approach rule for vessels. Such a buffer zone in the Stellwagen Sanctuary would provide protection against recreational and commercial fishermen, whale watch vessels and curious recreational boaters. After the buffer zone is established, the Sanctuary would have the option to consider the development of special use permits for whale watch operators and operator certification programs if such permits are found to be justified. Combined, these measures would go a long way in reducing disturbance and harassment by vessels.

### **Regulate to Prevent Behavioral Disturbances to Marine Mammals**

Closely related to ship speed is the behavioral disturbance caused by vessels. Because sound is so important to marine mammals, noise from sea craft and other sources can greatly disrupt their standard behavior. Reduction in vessel speeds will inherently reduce the sound intensity originating within the sanctuary, so the regulatory speed limit will prove beneficial in more ways than simply reducing the risk of collision.

Also, because of marine mammal's sensitivity to noise, fly-over by aircraft, including planes and helicopters, is likely to have a negative effect on whale behavior. DRAFT MGMT. PLAN at 233. The Stellwagen Bank Council proposed to research over-flight to determine the effects on marine mammals, *Id.* at 233-34, but it is within the authority of the Secretary to work with the FAA to issue protective regulations at this time. Recently, sonar testing in the Bahamas, Canary Islands, U.S. Virgin Islands and the Pacific Northwest has led to a tenuous link between ocean noise and beached whales. While over-flight may not be intense enough to immediately cause harm, the Secretary can reasonably support a finding that aircraft flying over the sanctuary "injure a sanctuary

resource,” 16 U.S.C. § 1434(d)(2). Therefore, IFAW encourages NOAA to immediately establish a 1000 feet approach rule for aircraft similar to the aircraft approach rule established for the Hawaiian Islands Humpback Whale Marine Sanctuary. There is simply no justification for aircraft to fly lower than 1000 feet above whales and such a buffer zone would reduce noise and prevent harassment by aircraft.

Offshore drilling near the Sanctuary also contributes to the ocean noise negatively affecting marine mammals. Although drilling is not allowed within the Sanctuary itself, the Council must work to ensure that any byproducts of drilling outside the Sanctuary boundaries, including noise, do not impact sanctuary resources.

Vessels tend to cause behavioral disturbances in other ways, as well. The Management Plan contains an action plan to “develop a process to consider” prohibiting entry into a humpback whale’s bubble cloud. DRAFT MGMT. PLAN at 230. Because this practice both disturbs whale feeding habits and increases the risk of ship strike, there is no need to *develop a process to consider* such a prohibition. There is never a need to enter a whale’s bubble cloud. This human use is so incompatible with sanctuary resource protection that the practice should be prohibited immediately. Rather than wasting time to *develop a process to consider* banning the practice, the Council must follow the NMSA’s mandate and actually protect whales from this needless harm.

### **Prevent Ecosystem Degradation**

The ecosystem within Stellwagen is decaying in large part due to human use of the Sanctuary’s resources. Proper management of the ecosystem is necessary because a healthy, fully-functioning ecosystem is critical to the primary objective of resource protection. *Id.* at 206. Seabed protection, reducing biomass removal impacts, and improving water quality are all factors which the Management Plan addresses inadequately.

Protecting the seabed, a major part of the Sanctuary ecosystem, is a critical goal in the effort to reduce and possibly reverse ecosystem degradation. However, instead of banning the practice of laying cable and pipe within the Sanctuary as IFAW urges, it has been recommended that unspecified minimum criteria be established. *Id.* at 215. The action plan granting the Sanctuary the option of removing the cable or pipeline at the permittee’s expense, DRAFT MGMT. PLAN at 215, demonstrates the foolishness of allowing anyone to lay pipeline or cable. The pipe or cable only has a finite serviceable life, so each installation necessitates two separate disturbances of the seabed: one during installation, and the second during removal. Because the seabed recovers very slowly, the long-term damage from two disturbances overrides any benefit from the pipeline or cable. In the alternative, the Sanctuary should move forward with establishing strict criteria for permits and especially the requirement that applicants post a performance bond.

One of the toughest challenges is reducing the alteration of important Sanctuary bottom habitats by mobile fishing. The Sanctuary has been a prime fishing area for centuries and as a result, bottom habitats have already been altered.

Moving forward will require the identification and location of essential bottom and fish habitats within the sanctuary. The next step will require identifying specific measures that should be adopted to protect and in some areas restore benthic habitats. Measures that should be considered range from establishing no fishing zones, no mobile fishing areas, seasonal closures and allowing only specific authorized sustainable fishing gear to be used in all or part of the sanctuary.

IFAW is particularly concerned about the potential for local depletion of fishery resources within the sanctuary. IFAW also strongly supports the notion of identifying and requiring environmentally sustainable fishing gear in all or part of the sanctuary. For the past several years IFAW has worked with the Cape Cod Commercial Hook Fisherman's Association in promoting sustainable hook fishing. Demersal longline fishing is one of the most environmentally benign methods of fishing and it may be appropriate for the Sanctuary to establish "hook fishing only" zones.

Regulating fishing activities within the Sanctuary represents one of the biggest and most important challenges identified in the Plan. Success will require a tremendous amount of cooperation, sound science and most of all an understanding and appreciation of the difficulties already faced by the New England fishing industry. If done right, IFAW believes that important new protections for bottom habitats and fishery resources within the Sanctuary can be secured.

IFAW agrees that assessment of circulation patterns around and inside the Sanctuary is a critical part of the Management Plan. By making findings which can show that human use outside of the Sanctuary, particularly by way of chemical and waste discharge, harms the Sanctuary ecology, the Secretary will be able to recommend regulations to other agencies which reach beyond the Sanctuary's borders. Already the massive Massachusetts Water Resources Authority (MWRA) outfall pipe, which lies just 9 miles from the western boundary of the sanctuary, discharges over 300 million gallons daily causing increased nutrient loading and eutrophication in the sanctuary. These regulations will have the added benefit of improving the general Gulf of Maine area, not just the Sanctuary itself.

The Council also proposes to reduce pollutant discharge within the Sanctuary by designating it "as a No Discharge Area (NDA) under relevant law." *Id.* at 224. The only "relevant law" necessary to introduce such a regulation is the NMSA. Under authority from the NMSA, discharge, with a few exceptions, is already prohibited in Stellwagen Bank. 15 C.F.R. § 922.142 (2007). The NMSA enabled that regulatory ban, and the only amendments necessary to make the Sanctuary a NDA is to remove the exceptions from the regulation. The NMSA defines a "sanctuary resource" as any "resource of a national marine sanctuary that contributes to the ... value of the sanctuary." 16 U.S.C. § 1432(8) (emphasis added). Water, being the resource that makes the sanctuary *marine*, is

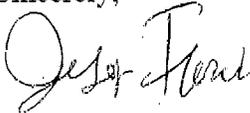
therefore intimately tied to any other value the marine sanctuary holds, thereby placing the water squarely within the Secretary's regulatory power under the NMSA. § 1434 (c). Instead of seeking external law, and all the bureaucratic hassles and delays that accompany them, the Management Plan should call for direct regulation in order to prevent dumping within the Sanctuary. This will achieve the same effect as an external designation, but it will keep the regulation under the Secretary and the National Marine Sanctuary's control.

## CONCLUSION

While the Management Plan has the right *idea* in many of its action plans, it fails to provide enough *action* within those plans. With proper regulation, rather than voluntary restrictions or continuing research in fields which are already settled, the objectives of both the NMSA and those dictated under the new "vision" of the Stellwagen Bank National Marine Sanctuary, found in the Draft Management Plan at iii, can be achieved much more effectively.

In conclusion, I hope that you find these comments useful as you move forward with improving the management of the Gerry E Studds Stellwagen Bank National Marine Sanctuary through implementation of the many action plans.

Sincerely,



Jeffrey Flocken  
U.S. Office Director  
International Fund for Animal Welfare



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**COMMENT LETTER**

**STELLWAGEN BANK NATIONAL MARINE SANCTUARY  
MANAGEMENT PLAN AND ENVIRONMENTAL ASSESSMENT**





Craig MacDonald, Superintendent  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066  
October 3, 2008

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10/3/08

*Ernie Fay*

Dear Superintendent MacDonald,

Mass Audubon wishes to congratulate you and the team that worked to create the most recent *Management Plan and Environmental Assessment* for the Stellwagen Bank National Marine Sanctuary (SBNMS) on their thorough attempt to address the many and varied physical, biological, and sociological components that comprise this complex marine resource. That such a rich resource is located within relatively easy reach of so many human user groups is one of Sanctuary's primary virtues. This reality is not without its challenges, however. The Sanctuary is a living tribute not only to the vision of Gerry E. Studts after whom the Sanctuary was named, but also to all those who made it possible to have the area dedicated as a National Marine Sanctuary (SBNMS) in 1992.

As noted in the current draft, seabirds represent a significant component of the biota of the Sanctuary. Consequently in 2001 Mass Audubon identified and designated the SBNMS as an **Important Bird Area (IBA)** in Massachusetts. This designation implies that the area *provides essential habitat to one or more species of breeding, wintering, or migrating birds, and which supports high-priority species, large concentrations of birds, exceptional bird habitat, and/or has substantial research or educational value.*



With its legacy of commitment to the conservation of the nature of Massachusetts, Mass Audubon has a vested interest in the future management of the Sanctuary and its biota – a fact underscored by comments previously provided by the Stellwagen Bank Coalition (including Mass Audubon) in 2001 to Joseph A. Uravitch, Chief of the Sanctuaries and Reserves Division of the Office of Ocean and Coastal Resource Management/National Ocean Service/NOAA . At this time, Mass Audubon re-emphasizes its concern that the responsible management of those components that are potentially most critical to seabirds using the area throughout the year be given significant priority.

Intrinsic to the designation of Stellwagen Bank as an IBA is the fact that “*The site regularly supports 300 or more individual pelagic seabirds and/or terns or 3,000 or more gulls at one time.*” (Massachusetts IBA Program, Criteria 3a [Seabirds]: [http://www.massaudubon.org/Birds\\_and\\_Birding/IBAs/criteria3.php](http://www.massaudubon.org/Birds_and_Birding/IBAs/criteria3.php)) By seabirds we refer to shearwaters, storm-petrels, fulmars, gannets, jaegers, and alcids. In addition, gulls represent a significant avian component of the SMNMS throughout the year, and in late summer and fall terns are notably abundant. Within this latter group is the Roseate Tern (*Sterna dougallii*), a federally listed endangered species whose foraging activity on Stellwagen Bank makes the area of particular significance during the pre-migratory staging period in late summer and early fall. Contrary to the often held impression that seabirds are essentially creatures of the air, not of the sea, it is well established that seabirds represent not only a major indicator of the vitality of a marine system, but also provide litmus for change when such systems become degraded.

Mass Audubon urges that stewards of the SBNMS be attentive to the health and vitality of the area’s seabird populations in future management considerations for the Sanctuary, as well as to those components of the ecosystem that are specifically essential to maintaining these seabird populations. Specifically, Mass Audubon advocates that regular, long-term monitoring of both seabirds and their attendant prey populations be initiated and maintained.

Several of the seabird species that utilize the SBNMS in summer are austral breeders (e.g., Greater Shearwater, Sooty Shearwater, and Wilson’s Storm-Petrel)

that annually make trans-equatorial migrations to the Northwest Atlantic Ocean specifically to forage on the abundant marine resources available to them in highly concentrated locations such as the SBNMS. The aforementioned species along with a number of Northern Hemisphere breeding species (e.g., Manx Shearwater, Northern Gannet, Razorbill) seasonally depend on abundant bait fish (i.e., forage fish) populations that annually occur in the Sanctuary's waters. Exemplary of these fish species are sand lance (*Ammodytes* sp.) and herring (*Alosa* sp., *Clupea harengus*), along with several other species of lesser importance. The maintenance of robust populations of these critical forage fish is crucial to the sustained well-being of seabirds, as well as cetaceans, throughout the year.

How to manage these forage fish species while managing for more commercially valuable ground fish, shellfish, and lobster populations is a challenge to those agencies tasked with fisheries management. However, because seabirds are a significant and important component of the Sanctuary's fauna and are closely linked to these fisheries, future fisheries and other management efforts should be prioritized to ensure the sustainability of these forage fish populations. Similarly, since plankton species (e.g., *Calanoid* copepods) provide critical food for many of these forage fish species, as well as for seabirds such as storm-petrels, then clearly the marine waters of the Sanctuary need to be capable of sustaining viable populations of these invertebrates. While the chain linking abiotic nutrients and plankton at the bottom, to top level consumers such as cetaceans and seabirds at the top is short, the interlocking links must remain strong in order to avoid collapse.

In order to thwart a potential collapse of Stellwagen Bank seabird populations Mass Audubon recommends that Sanctuary managers seek ways in which to establish and sustain monitoring efforts of seabird populations at the Sanctuary. In addition, Mass Audubon recommends that there be similar on-going monitoring of plankton and forage fish populations.

Equally important is for Sanctuary managers to address these issues within the context of global climate. As Sanctuary waters heat up, increasing ocean

temperatures will likely affect plankton and forage fish populations, along with the populations of the seabirds that depend upon them. While the solution to some of these anticipated changes represents a conundrum for the scientific community, it must accordingly also remain paramount in the minds of those who hold the future of Stellwagen Bank in their trust.

Mass Audubon appreciates the opportunity to comment on the *Draft Management Plan* and we are optimistic that responsible stewardship of this outstanding marine resource will continue.

Sincerely,

John J. Clarke

Director of Public Policy and Government Relations

Congress of the United States House of Representatives

JOHN F. TIERNEY MASSACHUSETTS SIXTH DISTRICT



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jfp

REPRESENTATIVE JOHN TIERNEY FAX TRANSMITTAL (978) 531-1996

Date: 10/3/08

No. of Pages 3 (Including Cover Sheet)

To: Stellwagen Bank Marine Services

Company:

Fax#: 1-781-545-8036 Telephone #:

Comments: COMMENTS

Thank You

- From: Gary Barrett Cheryl Gresek Lori Pattison George McCabe Claudia Neidhardt Matthew Patton Helen Rush Lloyd Rose Mary Sargent Intern

Rep. Tierney Please Call (978) 531-1669 if transmission is incomplete

COMMITTEES

EDUCATION & LABOR SUBC ON HIGHER EDUCATION, LIFELONG LEARNING AND COMPETITIVENESS SUBC ON HEALTH, EMPLOYMENT, LABOR AND PENSIONS

OVERSIGHT & GOVERNMENT REFORM SUBC ON NATIONAL SECURITY AND FOREIGN AFFAIRS (CHAIRMAN) SUBC ON DOMESTIC POLICY

PERMANENT SELECT COMMITTEE ON INTELLIGENCE SUBC ON OVERSIGHT AND INVESTIGATIONS

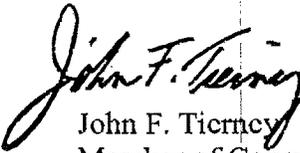
DEMOCRATIC STEERING & POLICY COMMITTEE



Despite the language in the document that pertains to resource depletion and destructive fishing activities the Stellwagen Bank Sanctuary has been and continues to be part of a highly productive Gulf of Maine ecosystem.

In regards to the recommended actions set forth in the draft management plan I strongly suggest that fishery management remain under the Magnuson law and any proposed changes go through the NFMC process.

Sincerely,

A handwritten signature in cursive script that reads "John F. Tierney".

John F. Tierney  
Member of Congress

# Gloucester Fishing Community Preservation Fund

October 3, 2008

Stellwagen Bank National Marine Sanctuary

175 Edward Foster Road

Scituate, MA 02066

Re: Draft Management Plan

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The Gloucester Fishing Community Preservation Fund is a 501c3 non-profit corporation organized exclusively for charitable, educational and scientific purposes permitted under Section 501(c)(3) of the Internal Revenue Code. Our purpose is preserving and promoting awareness of Gloucester's fisheries, heritage, and the fabric of the Gloucester community; protecting and enhancing the Port of Gloucester and the Port's infrastructure; and, in order to aid disadvantaged fishermen, serving as a central repository and exchange for the distribution of limited access, multi-species fishing privileges and permits for fishing vessels based in Gloucester.

The GFCPF has received substantial funding as a result of a vision put forward through the offshore LNG mitigation process. This funding is specifically restricted to be used for the purpose of setting up and operating a "Permit Bank" that will retain sufficient fishing access to sustain port infrastructure and future access to a rebuilding and rebuilt resource. The GFCPF is actively developing programs for Boston and South Shore that will be analogous to the Gloucester permit bank concept. All are heavily dependent upon the areas within the SBNMS.

The GFCPF currently services approximately One Hundred vessels that have been historically dependent upon the port of Gloucester. Seventy-Six of these vessels are under 49' in length. These vessels are near 100% dependent upon the productive fishing grounds within the current SBNMS delineation.

The GFCPF supports comments submitted by the Massachusetts Fishermen's Partnership and the Northeast Seafood Coalition. Rather than to reiterate details contained in those comments we state our support for the issues raised.

GFCPF submits the following comments for the purpose of strenuously stating the critical importance of the historical facts underlying the current sanctuary delineation and the continued dependency for the preservation of the cultural heritage of our coastal fishing communities.

In 1992, the fishing communities were actively engaged in the designation of the SBNMS. The designation process involved critical input from the fishing communities most dependent upon the oldest "heritage trade" in the commonwealth, commercial fishing.

In short, the bounds of the sanctuary were intentionally drawn and supported by commercial fishing interests FOR THE PURPOSE OF PROTECTING AND PRESERVING VALUABLE FISHING GROUNDS from drilling, dumping, mining, dredging or any other development activities.

It is extremely disturbing to see the apparent loss of this historical fact as is evident within the advocacy laden Draft Management Plan.

## Gloucester Fishing Community Preservation Fund

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It appears the SBNMS has chosen to ignore the enormous responsibility the sanctuary adopted when these precious fishing grounds were entrusted. Nowhere does the document appropriately acknowledge the fact that the very survival of centuries old fishing communities like Gloucester, Plymouth, Scituate and Boston is dependent upon the continued and adequate access to the very areas these communities supported for protection when designating SBNMS in 1992.

Instead, the very delineation supported for the purposes of ensuring protection for the most valuable FISHING grounds vital to the survival of the inshore traditional fishery is the delineation the SBNMS is using to evaluate for PROTECTION AGAINST FISHING.

Some may say "that was then and this is now".

We acknowledge the fact that nearly all of the folks now involved in the SBNMS did not have the benefit of first hand involvement in the original designation. But this should not exempt the SBNMS from executing what would result in a classic bait and switch. These and other comments are warning of the perverse consequences to the coastal fishing communities home to the small boat, inshore fleet if gone unheeded or weighted improperly.

No single action would have a higher negative impact or pose a greater threat toward eliminating the entire inshore fleet of Massachusetts than the loss of access to the traditional fishing grounds within the current delineation of the SBNMS.

### BIO-DIVERSITY?

The mud basins have been trawled for more than 60 or 70 years. The combination of gear restrictions, high catch rates on smooth bottom and the small average size of vessels that bottom trawl within the SBNMS means that bottom trawling occurs on a smaller footprint today than when the SBNMS was designated. No new bottom is ever sought or touched. Any loss of benthonic habitat occurred over half a century ago. These areas continue to produce excellent catches of the finest, safest eating seafood.

Fixed gear hook and gillnet fishermen have low net limits, breakaway lines, pingers, sinking lines, special anchors, and Dynamic Area Closures that have dramatically reduced the effort of these fishermen.

LOSS OF ACCESS to traditional gears such as bottom trawl and gillnet will result in such inefficiency by virtue of the loss of yields of flounder, monkfish and other valuable species that the small, that the inshore vessel fleets will shrink to a point that the historic coastal fishing communities and their vital infrastructure will be lost forever.

In short, the loss of access by traditional bottom trawl and gillnet methods to SBNMS will result in catastrophic social and economic losses to historical fishing communities along with the loss of millions of pounds of the healthy seafood available to American consumers. The SBNMS as it is currently delineated is Irreplaceable and vital to any chance of survival of an inshore fleet.

## Gloucester Fishing Community Preservation Fund

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In closing, GFCPF wishes to express our recommendation to continue to have fisheries management under the comprehensive laws of the MSRA through NMFS and the regional council process. The GFCPF also recommends that the SBNMS disclose the location and of the historical wreck sites and the alternatives considered for measures to protect the sites before soliciting comment from the stakeholders who will be most impacted. Thoughtful and meaningful comment is dependent upon this critical information.

The GFCPF wishes to thank the SBNMS for this opportunity to comment on the Draft Management Plan.

Respectfully Submitted,

Vito Giacalone, Executive Director, Gloucester Fishing Community Preservation Fund

10 Witham St.

Gloucester, MA 01930

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BOSTON, MA 02114  
617-626-1520  
617-626-1509 FAX

PAUL DIODATI  
DIRECTOR

# Fax



**To:** Craig MacDonald **From:** Paul Diodati

**Fax:** 781.545.8036 **Pages:** 25 19

**Phone:** \_\_\_\_\_ **Date:** 10/3/08

**Re:** \_\_\_\_\_ **CC:** \_\_\_\_\_

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fax



Paul J. Diodati  
Director

*Commonwealth of Massachusetts*

**Division of Marine Fisheries**

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Deval Patrick  
Governor

Ian A. Bowles  
Secretary

Mary B. Griffin  
Commissioner

October 3, 2008

Mr. Craig D. MacDonald, Ph.D.  
Superintendent

Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Road  
Scituate, MA 02066

Dear Dr. MacDonald:

The Division of Marine Fisheries (*Marine Fisheries*) offers the following comments on the Sanctuary Draft Management Plan (the Draft Plan) and Environmental Assessment. These comments come almost six years since our first set of comments (October 17, 2002) that covered a wide range of issues with one emphasis being on the Sanctuary's need to gain trust with fishing communities economically dependent on valuable, historic Stellwagen fishing grounds.

We suggested you parlay that trust into long-term relationships involving collaborative research and support for Sanctuary approaches to deal with impacts of fishing on Sanctuary resources. We urged you to create: (1) research agendas and strategies to answer important Sanctuary questions along with action plans related to protection of well-defined, sensitive habitat; and (2) blueprints for continued cooperation with and support from the fishing industry and state and New England Fishery Management Council (NEFMC) fisheries managers who share many of the same concerns as the Sanctuary.

Now we have the Draft Plan to consider with action plans. We contributed to the development of some of those action plans. In particular, *Marine Fisheries* contributed to the Ecosystem-Based Sanctuary Management (EBSM) Action Plan dealing with issues and actions crossing over to the Ecosystem Alteration Action Plan having two objectives pertinent to *Marine Fisheries* and NEFMC fisheries managers, e.g., reducing alteration of benthic habitat by mobile fishing and reducing ecological impacts of biomass removal by fishing.

We now look forward to our continued involvement with Sanctuary planning, especially through our membership on the Sanctuary Zoning Working Group that is focusing on habitat zoning that will include, according to the Draft Plan (page 355), consideration of fully protected reserves to meet scientific requirements and goals of EBSM. This Zoning Working Group has been inactive over the past two years, but we anticipate the group will convene soon after the Draft Plan is made final.

In 2002, we urged you to work with fishermen as a partner for Sanctuary sustainable use and protection. However, comments at public hearings indicated fishermen feel you already have concluded fishing is incompatible with - and a major threat to - the Sanctuary. The intensity of fishermen's responses can be understood especially from those who worked hard and provided assistance over these many years on Draft Plan development.

Our comments and recommendations are lengthy and detailed because your findings and proposed actions demand a serious and well thought-out response/critique. As the Draft Plan potentially forecasts major changes in traditional uses of the Sanctuary, we recommend a full national Environmental Policy Act review and more outreach and discussion with fishermen and other stakeholders. We address sections of the Draft Plan by subject headers.

### **Executive Summary**

Starting with the Executive Summary one finds the message to "*rediscover the sanctuary*" and that the plan is "*based on the concept of managing marine resources for biodiversity conservation.*" This suggests targeting the fishing industry as the principal threat to the Sanctuary as evidenced by the hyperbolic "key finding" of the Draft Plan, i.e., "*...However, fishing – especially commercial fishing – impacts and pressures every resource state in the sanctuary. On an annual basis, virtually every square kilometer of the sanctuary is physically disturbed by fishing. Fishing has removed almost all of the big-old growth individuals among biologically important fish population and reshaped biological communities and habitats in the process...*"

The Executive Summary then highlights the Sanctuary Advisory Council (SAC) vision for the future that, according to the text, "contrasts" with current conditions in the Sanctuary. Therefore, one concludes from reading the vision that the Sanctuary is neither teeming with great diversity and abundance of marine life nor supported by diverse, healthy habitats in clean ocean waters. Furthermore, one concludes the Sanctuary's ecological integrity is not protected and fully restored for current and future generations and the Sanctuary ecosystem must be restored. We disagree with this portrayal.

The Executive Summary highlights the Sanctuary's likely need to amend its designation document to acquire authority over fishing in the Sanctuary. There is no mention of working with the Commonwealth or the NEFMC to achieve shared objectives. Relationships with states and the Council are described on pages 15-16, but the importance of these relationships should be emphasized in the Executive Summary as well as the Draft Plan Summation.

You should acknowledge that the Commonwealth and Stellwagen Bank National Marine Sanctuary (SBNMS) share boundaries and many of the same fisheries resources that traverse between and within state and Sanctuary borders. We refer you back to our October 2002 comments and to our policies for Marine Protected Areas (MPAs; January 2004) that reference the Sanctuary. The Sanctuary abuts and is at the doorway of Commonwealth waters of Massachusetts and Cape Cod Bay. It is not separate and distinct from surrounding coastal and more offshore waters especially with regards to finfish that seasonally move in and through the Sanctuary with some being temporary and seasonal residents (e.g., cod, redfish, flounders, herring, and sand lance).

We don't mean to diminish the importance of the Sanctuary. We only mean to highlight it's being part of a whole – an important part, to be sure. Your Draft Plan section on "Connectivity" (pages 41-42) makes this point although reference to connectivity with the Commonwealth's waters is conspicuously absent.

### **Summation**

Although you recognize the Sanctuary having historic fishing grounds you de-emphasize the present-day importance of the Sanctuary to fishermen. Instead, introductory paragraphs note that historic exploitation of cod is "*difficult to perpetuate today as a result of overfishing, coastal and ocean habitat destruction...*" and that "*modern appreciation*" of Sanctuary resources equates to protection of intrinsic value and multiple ecosystem services. Those paragraphs continue: "*Consumptive uses (including fish and seafood production)*" must be environmentally sustainable and "*compatible with the widely recognized need and legislative mandate for resource protection.*" We disagree with the Draft Plan's conclusions.

The summation's highly suggestive sections (current challenges and compatible uses) reveal the Sanctuary's likely next step(s), i.e., to use the Draft Plan's findings as a basis for concluding that fishing is incompatible with Sanctuary use. You make it clear that: "*...the key to protecting and restoring biological communities within the sanctuary must be modification of fishing activities to make them environmentally sustainable such that habitats are not damaged and excessive biomass as bycatch is not removed. If the sanctuary is to be effectively managed for biodiversity conservation, fishing in the sanctuary cannot continue solely in terms of the more conventional sense of sustainable production. Rather the calculation of optimum yield (our emphasis) within the sanctuary should explicitly include the protection of biological diversity pursuant to the objectives of the National Marine Sanctuaries Act.*"

We highlight all of the above to make our point that the fishing industry that relies on fishing within Sanctuary boundaries feels threatened. After all, the Sanctuary has characterized fishing as affecting Sanctuary resources "*through multiple pathways to cumulatively impact biological community interactions*" causing "*changes in the composition of biological communities ultimately affecting the ecological integrity and biological diversity of the Stellwagen Bank Sanctuary*" (page 170).

### **Draft Management Plan Outreach & Presentations**

The Sanctuary Office has been disingenuous in its attempt to influence public opinion about biodiversity in the Sanctuary. The Sanctuary continues to highlight a graphic, eye-catching poster entitled, "Inside the Anemone Forest" to describe mud basins with "densely-spaced anemones [*Cerianthus borealis*]" that form forests on the seafloor. However, this artwork is a composite portrait from the artist's imagination. The artist acknowledges in *Stellwagen Soundings* (Vol. 10, No. 1, 2005), "This painting represents no particular site in the Sanctuary, but showcases the variety of species that can be found in these special muddy sea floor forests." We recommend you support your arguments with scientific data and photos of the actual and varied habitats in the Sanctuary.

What also is not mentioned is that the forest temporarily retracts when disturbed, i.e., the anemones retract and compress themselves to the bottom and in depressions. To what extent this escape behavior enables "forests" to avoid "clear-cutting" by mobile bottom-tending gear is a subject for research.

Furthermore, photos taken by the NOAA Maritime Heritage Program on or near shipwrecks are highly selective. They leave the viewer with a mistaken impression of Sanctuary undisturbed habitat.

### **Action Plans**

We consider the action plans to be the backbone of the Draft Plan. The SAC has spent countless hours working with your staff to craft these plans to describe what we don't know about Sanctuary dynamics and begin or continue efforts to increase understanding and then be the basis for future management actions requested of those with the authority to take those actions, e.g., NEFMC.

Strategy 2.2 is an excellent example; it reads, "*Develop a science plan to assess and mitigate benthic habitat alteration: Conduct and/or encourage research resulting in a greater understanding of benthic habitat alteration and ways to mitigate impacts from mobile bottom fishing gears. The research should be directed at determining how benthic habitats and their associated biological communities are structured and function in the presence and absence of fishing.*" This is a smart strategy with activities related to the overall objective and responsive to what we do not know.

Furthermore, Strategy 2.1: "*Develop a process to establish reference areas that serve as benchmarks for discerning human and natural impacts on habitat alteration*" is sensible. The Zoning Working Group will deal with this strategy, and we suspect the group will deal with this issue of reference areas sometime in late 2008 or 2009.

However, after reviewing this Ecosystem Alteration (EA) Action Plan we conclude an important element is missing. This element is the heart of the Draft Plan and its potential impact on mobile gear fishing, i.e., compatible use. How will compatibility be determined and will there be degrees of compatibility, i.e., compatible in some areas but not in others or will it be a 2-option "you're in or you're out" (compatible versus incompatible)? We ask these questions because the background material prefacing EA.2 strongly suggests that mobile fishing will be incompatible with Sanctuary use or at least in 66% of the Sanctuary (page 216).

### **Compatibility Determination**

Considering the Draft Plan's emphasis on mobile gear fishing within the Sanctuary, we had expected to see at least one example of "compatibility determination" for mobile gear fishing. Instead, there's only one example, and it's for marine mammals. Your focus on marine mammals is warranted, but your example leads to more questions than answers. In Figure 119 (page 205) the all-important "standard" is "*marine mammal behavior is not altered and marine mammals are not struck or entangled by 'x' activity.*" Perhaps it would have been better for you to force the issue and provide a vivid example of how the Marine Mammal Behavioral Disturbance Action Plan is connected to compatibility determination.

Specifically, even though you propose just a "process" (framework) to determine compatibility, it appears you've already determined commercial and recreational whale watching is an incompatible use (i.e., the Behavioral Disturbance standard has not been achieved). We draw this conclusion after reading the Action Plan (page 230). We also conclude you're signaling that

commercial and recreational whale watching can be made compatible through strategy 1.1 with its associated seven activities.

On page 103 you say in your Issue Statement the "*AP only recommends process; it does not determine the appropriateness of any specific sanctuary use, current or potential...*" Instead of everyone having to "read between the lines" to discover the end result(s) clearly state what you already have concluded.

Here is an example of how we suggest you rework Figure 119 with mobile gear use in mind and the Sanctuary intent to zone the Sanctuary and potentially implement fully protected reserves (page 208, Table 38, EBSM.5). We use your formatting.

### Figure 119. Hypothetical Application of S-CAP Process

**Issues:** (1) Does mobile gear fishing in the SBNMS impact the composition of biological communities and adversely affect the Sanctuary's ecological integrity and biological diversity to the extent that it should be prohibited or restricted in specific areas or regions of this "urban" sanctuary?

(2) Would prohibitions or restrictions be consistent with facilitating compatible use by fishermen who fish mobile gear and are part of the SBNMS cultural legacy, e.g., mobile gear fishermen use and depend on this "urban" sanctuary as evidenced by their major contribution to Congressional recognition of the Sanctuary's importance and its eventual designation?

**Vision:** Ecological integrity is protected while recognizing and facilitating the need for continued compatible and diverse human use. [Note: Do not include "full restoration" unless this ecosystem attribute is well-defined with useful and realistic metrics in the plan. Currently, the SBNMS has "fully restored" in its Vision statement (page 182). Regardless of how "fully restored" may be defined, getting this state will be difficult as you acknowledge: "*The extent to which the sanctuary can be restored is dependent on the state that can be sustained within the greater Gulf of Maine and Atlantic Ocean, given the changes (some irreversible) that have occurred to ecosystems throughout the globe.*"]

**Mission:** Biological diversity, ecological integrity, and cultural legacy conservation protection and enhancement while facilitating compatible use [Note: "Cultural" should be clarified to ensure respect for and attention to the rich cultural aspects of commercial and recreational fishing within the Sanctuary contributing to the establishment and growth of fishing communities bordering the Sanctuary. Refer to page 133 where you state: "*Just as Gloucester is considered America's oldest seaport, Stellwagen Bank (formerly Middle Bank) is listed among the most historic fishing grounds in the Gulf of Maine, harkening back to early colonial times...*" The "Context" section of the "Summation" begins: "*The Stellwagen Bank sanctuary has a long cultural (emphasis added) tradition based around fishing and whaling. Humans have depended on the sanctuary's diverse and abundant marine resources for sustenance and economic prosperity for hundreds of years...*" Also refer to page 31 and the 1635 map with its "pyramid of cod heads" used as a clever marketing approach to draw settlers to New England.].

**Goal:** Achieve the mission.

**Objectives:** (1) Discern human (mobile gear fishing) impacts on habitat from

natural impacts; (2) Understand the processes of and time for habitat recovery from mobile gear fishing and natural impacts (e.g., storms); (3) Identify areas in the SBNMS where mobile bottom fishing gear should be modified, restricted or prohibited; and (4) Determine the extent to which status quo mobile gear fishing in areas subject to some degree of fishing gear disturbance (e.g., mud) should be allowed thereby providing access to fish and shellfish that can only be caught with mobile bottom-tending gear

**Standards:** (1) Science plan for zoning and assessment/mitigation of benthic habitat alteration is developed and implemented; and (2) 3-dimensional, vertical profiled, structured bottom communities of invertebrates and plant life – not subject to natural disturbances and impacts – is not swept away or damaged by mobile gear fishing in areas/regions not zoned for status quo mobile gear fishing.

**Indicators** that standards are being achieved:

- Funds have been allocated for science plan development and implementation.
- Science Plan activities (EA.2.2.1 - 2.2.4) occur as scheduled.
- Marine benthic communities begin to emerge and flourish in areas where mobile gear fishing is modified, restricted, or prohibited.
- Mobile gear fishermen have access to key SBNMS fishing grounds – access provided through negotiated agreements recognizing fishermen's dependence on those grounds and Sanctuary desire to zone some bottom as reference areas (EA.2 Strategy 2.1) and as elements of ecosystem-based sanctuary management (i.e., protecting sanctuary ecological integrity, EBSM.4, Strategy 4.1).

### **Vision & Mission**

Our suggested reworking of Figure 119 for mobile gear use in the SBNMS (above) refers to a specific vision and mission statement. Your Figure 119 has its own vision and mission. We note they don't correspond to the Sanctuary's vision and mission detailed and "unpacked" on page 182. If these statements for each action plan differ from the Sanctuary vision itself, we suggest there's a disconnect and compatibility determinations will be very difficult to make and will be confused.

We recommend you modify the vision statement. By stating that ecological integrity should be "fully restored," you leave the reader wondering what you "see" for the future because in the "ecological integrity" definition you reveal that the term is "neither well defined nor completely understood."

"Ecological integrity" is a challenging concept, yet it is the cornerstone for sanctuary management. Your draft definition for ecological integrity (page 362) is lofty and very ambiguous. The Zoning Working Group that drafted this definition in 2006 acknowledged it needs more work and refinement. The group argued for caution in using the definition as the Sanctuary's platform. For example, we have no idea about the degree to which the system is structurally intact and functionally resilient within the context of historic baselines. "Structurally intact" and "functionally resilient" are defined in the ecological integrity definition, but those definitions are just as ambiguous and unquantifiable.

Ecosystem-based management has not evolved to the point where quantitative assessments of ecosystem status and integrity are feasible - until a suite of ecosystem multiple metrics can be

developed and applied. Those metrics will have to be sensitive to change, directional, general enough to be useful, feasible to measure, able to incorporate uncertainty, and not be cost prohibitive.

### **Historical Baselines**

Reference to historical baselines is found in your definition of ecological integrity and on pages 30-31. You indicate, *"To the extent possible, an understanding of the historic abundance and diversity of organisms in the Stellwagen Bank sanctuary area is essential to effectively manage biodiversity conservation... Historical baselines can help avoid underestimations of ecosystem capacity or biased policy decisions resulting from lack of historical context."*

We agree that baselines are important, and "shifting baselines" can cause managers and those they regulate to forget or not realize the history that pre-dated them. Unfortunately, that history may be undocumented especially if it goes back many decades or centuries. Moreover, those historical baselines may have been influenced by factors beyond the control of managers, i.e., temperature trends or even climatic change and different oceanic regimes. Species and trophic interactions also have an important role. Your "ink-blot" or tangled "bird's nest" (Figure 7) highlights just how complicated and indecipherable those interactions can be.

We appreciate the Sanctuary's concern about fish, especially cod, and we understand why you rely on a very informative paper published by Rosenberg et al. in 2005 (The history of ocean resources: modeling cod biomass using historical records). This paper is useful for indicating what might be; however, their analyses focus on landings of cod caught on Canada's Scotian Shelf in the mid-19<sup>th</sup> century. They estimated cod total biomass in 1852 to have been around 1,260,000 metric tons – a far cry from today. But, that catch was from trips taken far and wide all along the Nova Scotian Shelf and southwest of Newfoundland. Amazingly, these sailing schooners left the Gulf of Maine to find productive fishing grounds.

One wonders why they traveled so far. We suspect the answer is that's where the cod were in greatest abundance – not in the Gulf of Maine. The Scotian Shelf's productivity is related to subarctic waters flowing south along the Nova Scotian shelf. Cod in the Gulf of Maine and on Georges Bank are at southern extent of their range and subject more to warmer water impacting their reproductive success, growth potential, and abundance.

This fact is supported by recent Northeast Fishery Science Center (NEFSC) advice and warning that the productivity of groundfish off New England is declining. For 12 of 20 stocks length and weight are decreasing. The trend in maturation has increased for 11 stocks. Most significant, there has been a regional overall warming trend for summer and winter temperatures, and there has been a recent increase/shift in Georges Bank zooplankton anomalies since 1990 all associated with a change in the inflow of Labrador Subarctic Slope Water (ATSW), i.e., cool, fresh, low nutrient shelf water. Furthermore, the North Atlantic Oscillation index continues to be positive meaning that ATSW isn't making its way southward into the Gulf of Maine and Georges Bank. Warmer, southern water continues to penetrate to the north. This has serious implications for Gulf of Maine cod abundance and other groundfish needing colder environments to promote recruitment and rebuilding. We refer you to NOAA Fisheries' "Ecology of the Northeast Continental Shelf: Toward an Ecosystem approach to Fisheries Management" (pages 6-7, "ecosystem drivers"). [Note that this publication highlights, through its back and front covers, luxurious growth ostensibly as a result of ecosystem management. These photos are from

a Sanctuary shipwreck (not identified as such) you properly describe on page 8 of "Stellwagen Banknotes" (Spring 2008). The Draft Management Plan would have benefited greatly from actual photos of rock piles and associated marine life. Using a shipwreck with its vertical profile (Paul Palmer? Page 124) to make a case for the benefit of ecosystem management is deceptive unless, of course, the Sanctuary intends to establish a network of deepwater artificial reefs.

We recommend you move away from reliance on historical baseline arguments as your "fundamental concept of biodiversity." We appreciate your desire to recommend targets that can be considered "historical," but you won't find any for the Sanctuary or for the Gulf of Maine. You can promote rebuilding strategies for the Gulf of Maine through the NEFMC that will greatly benefit the Sanctuary while recognizing the Sanctuary's "urban" nature and fishermen's dependence of Sanctuary fishing grounds.

### **BOFFF Hypothesis**

We support your two key and related issues especially relevant to cod rebuilding and "for cod to once again become a major functional part" of the Gulf of Maine ecosystem (pages 78-79). The NEFMC should prevent continued truncation of the size and age structure of GOM cod and subscribe to the BOFFF hypothesis, i.e., protect "Big, Old, Fat, Fecund, Females."

This BOFFF hypothesis was instrumental for *Marine Fisheries'* implementation of our Cod Conservation Zone (CCZ) in state waters to the west of the Sanctuary extending from outer Boston Harbor to the state's boundary. The CCZ has reduced commercial and recreational fishing pressure on large aggregations of pre-spawning and spawning cod from December through February. Tied to this management initiative was research in the CCZ – research enabling us to consider modifying the closure's timing to December through January beginning later this year and next. Our research and monitoring have indicated cod move out into federal waters at that time where they are targeted by fishermen in Stellwagen and elsewhere.

### **Site Fidelity**

More consideration should be given to the implications of our CCZ work and Sanctuary concerns regarding these conservation/protection issues that we believe are quite real and will take on even greater importance due to the 2007 Magnuson-Stevens Reauthorization Act (MSRA). Your conclusions should have great weight in this NEFMC debate and spur important scrutiny of Sanctuary research you already have suggested makes a strong case for "[cod] management directed at the Sanctuary area alone (as opposed to the entire GOM) may be effective in meeting Sanctuary objectives" (page 80). We refer to your finding that "...35% of Atlantic cod tagged in the sanctuary demonstrated a high degree of site fidelity and a meta-analysis of 100 years of cod tagging studies across the North Atlantic showed a high rate (32%) of sedentary behavior for this species..." (page 50).

We are especially interested in this research because you use it to conclude: "...The high site fidelity of many cod to individual piled boulder reefs suggests that habitat-specific management measures, such as marine reserves (our emphasis), may offer significant protection to cod within the sanctuary. Neat et al. (2006) conclude that marine protected areas could be an effective management measure in sustaining small resident populations of Atlantic cod." Here's where a detailed chart of the Sanctuary plotting all boulder reef sites will be important, especially for the Zoning Working Group.

Your "site fidelity" work cited in Lindholm et al. (2005) is quite useful, although results are not surprising. *Marine Fisheries* cod survey work with commercial fishermen is consistent with your findings. Two surveys were completed (2003/04 & 2004/05) with each survey consisting of five cruises (Nov-Dec, Jan-Feb, Feb-Mar, Mar-Apr, and Apr-May). Each cruise involved 225 stations (about 1,125 stations/year). The survey was designed to measure spatial/temporal changes in cod distribution in the inshore waters of the Gulf of Maine.

Our data reveal that cod (i.e., greater 40 cm) leave "shallow" waters (e.g., 60 meters or 35 fathoms) starting in February/early March and move to deeper GOM waters (greater 70 fathoms) to the east. Your deep boulder reefs with acoustic receivers were placed in 60-65 meters, and "winter cod" were tracked through the end of February. The 27 cod you tagged between 16 September and 27 November 2004 averaged 57 cm. Therefore, it is unlikely these cod were "resident" on boulder reefs outside of the expected times when they occupy inshore fishing grounds, including Stellwagen, during the fall and spring.

Furthermore, your site fidelity data don't always show the fidelity you seem to have expected. For example, while 35% of your tagged cod showed "high" site fidelity (80-100%) to individual reefs (i.e., 35% of tagged fish recorded at reef of their release for greater 82% of time monitored), 51% showed "low" site fidelity (less 20% of time monitored). They left after a couple of days and were never recorded again. The other 13% "fell somewhere in between those two extremes" (page 50).

Nevertheless, your references to site residency and fidelity are on target and especially relevant to any initiative you may wish to promote with the NEFMC to protect pre-spawning and spawning cod in the Sanctuary, i.e., CCZ-like initiatives. You used some of the same research we referenced during the development of our CCZ.

However, like our CCZ initiative, any conservation/protective measure you may wish to promote will be handicapped by the cod themselves. Specifically, cod move great distances within the Gulf of Maine and travel outside the Gulf to Georges Bank and Canadian waters. The Draft Plan appears to miss this point because you focus on making your case that there is "high" site fidelity so marine reserves should be considered.

You omit any reference to movement (tagging) information revealing major movements into, through, and out of the Sanctuary. We urge you and your Zoning Working Group to review that information and consider its implications for sanctuary management. For example, although the researchers concluded cod in the western Gulf of Maine "are effectively resident" (about 70% of tagged fish traveled less than 30 km) with "limited seasonal movements," those movements are extensive enough to indicate it's inappropriate to refer to cod in the Sanctuary as "sanctuary cod."

#### **Draft Environmental Assessment**

The Draft Plan requests ask for a categorical exclusion from the requirement to conduct an environmental assessment or environmental impact statement. A categorical exclusion for a potentially major departure that could affect many traditional uses at the Sanctuary seems ill-advised and difficult to justify. We understand why you seek the exclusion because you indicate you're not proposing regulatory changes. However, it appears you are proposing regulatory changes or the potential for regulatory changes in many places in the Draft Plan. For example, you indicate that commercial and recreational whale watching can be made compatible through

strategy 1.1 with its associated seven activities. Those activities include criteria for speed control and restrictions, criteria for close approach, etc. You draw a very fine line here and elsewhere between not proposing regulations yet indicating very specific regulations must be adopted to obtain "compatible" status.

Additionally, NAO 216-6 (Environmental Review Procedures for Implementing the National Environmental Policy Act (page 7) indicates that "*categorical exclusions may not be appropriate when the proposed action is either precedent-setting or controversial...*" We argue that the Draft Plan is both, and even though specific regulatory actions are not proposed, many are inferred, e.g., the Sanctuary is working towards an objective of prohibiting or regulating mobile gear bottom trawling in two-thirds of the Sanctuary.

Consider that "*preparation of an EA or EIS is required if proposed actions involve a geographic area with unique characteristics.*" Therefore, because you argue Sanctuary uniqueness, an EA or EIS is required especially because in many cases you indicate an action. Granted, all the details are not provided, but they are actions. For example, in the Ecosystem Alteration Action Plan you have the following performance measure: "*By 2011, 50% of the bottom otter trawl and dredge fishermen in the sanctuary will be using fishing gear that reduces bycatch and habitat impacts*" (page 221). That performance measure begs for an explanation/justification and evaluation. This measure is an action by which performance of the EA AP will be measured, i.e., bottom otter trawl and dredge fishermen are to only fish modified fishing gear in 50% of the Sanctuary.

#### **Age/size Structure Truncation & Maximum Lengths**

Returning to the BOFFF hypothesis, we encourage you to pursue this concept with the NEFMC. Controlling fishing mortality must be done region-wide through NEFMC groundfish management with the Sanctuary providing advice, good science from Sanctuary research, and recommendations.

Your opening paragraph in "Changes in Fish Maximum Length" (page 79) begins with Jackson's claim that 3,500 years ago cod mean body length was 100 cm (39.4 inches). These data should not be used as a metric of historic average size in the population. This length was calculated based on vertebrae diameter collected from the Turner Farm shell midden (North Haven, Maine) deposited there by Native Americans. This approach assumes that all size vertebrae are equally preserved over time, have equal chance of recovery, and the ancient fishery for cod did not have any size selectivity.

From Jackson's "data" you cannot infer anything about the length structure of Gulf of Maine cod and certainly not from the Stellwagen Bank. Their biases would be similar to those experienced by calculating mean length of "whale" cod from a market sample in Gloucester or Portland and then assuming that sample represented mean length for all cod in the Gulf of Maine. [Note: Look at Jackson, et al.'s figure. Their claim of mean length observed from the earliest time period actually is in the low 80 cm range, not 100 cm as indicated in their table.]

Furthermore, Jackson et al. cite data from Bigelow and Schroeder (1953) to get sizes of fish from the coast. However, Bigelow and Schroeder do not provide any information enabling a calculation of average lengths in the population. Yes, they have tables of length-weight and average length-at-age, but they do not have catch by age or by length, or any survey length

distributions. We would have anticipated a review of their "research" submitted for publication would have caught these glaring problems. Apparently, that review did not; therefore, you and others referencing their paper have been misled.

We note one of the recent mean sizes provided in Jackson et al.'s graph is 20 cm with the table stating a mean size of 30 cm. This seems incredibly small, especially if it is catch data and not survey catch data that may be heavily weighted towards age 1 cod. Jackson et al. conclude: "New mechanized fishing technology in the 1920's set off a rapid decline in numbers and body size of cod." Despite not having a stock assessment, the authors concluded numbers declined and rapidly. Assessments began in 1982, and survey indices were available since 1963, not before. We suspect the authors' inferences on declines in population numbers are based solely on catch. If so, note that assignment of cod catch to (Gulf of Maine, NAFO Division 5Y) is unreliable prior to 1932.

No doubt three millennia ago cod age and size structure in the Gulf of Maine, especially in the southwestern portion, was far different than today. Fishing was minimal and the environment was different; coastal development, pollution and eutrophication were non-existent. This is 2008 with climatic changes and coastal population pressures. Certainly there must have been many very large cod and cod of all sizes and ages in varying proportions in some Gulf of Maine elaborate food web with many predator-prey interactions thousands if not hundreds of years ago. Actually, the 2000's continue to experience complex food webs with large cod still present.

We question an analysis presented in Figure 9 (page 35) where you attempt to show a "historical baseline of ecosystem condition." Although this ecosystem structure shift (also caused by high abundance of pelagics, i.e., sea herring and mackerel) appears to have been caused by competitive interactions and other factors, your conclusion (through Claussen) that fishing pressure has caused ecosystem condition to drop below the historical baseline is without foundation.

In Figure 9 two time-series are plotted: GOM: 1901-1935 and Northeastern US Continental shelf: 1950-2003 of which the GOM is a subset. Only means are shown, so there is no sense of variability around the annual estimates of trophic level.

Furthermore, catch data were not recorded for statistical area 5Y (Gulf of Maine) prior to 1932, and Gulf of Maine cod catches for the period prior to 1932 were estimated using the ratio of 5Y to 5Z (Georges Bank) for the period 1932-1976 (Lange and Palmer, 1985). The quality of data for the early and later time-series clearly is different, and comparisons are not legitimate.

Additionally, yearly species composition is not shown, so it is unclear how or why species composition has changed over the years. For example, lobster landings all but collapsed in 1905 and remained low through 1930. As a result, mean trophic level increases. Lobster landings were much larger prior to the 1905 crisis. Without knowing species composition (or even reliability of species composition in the historic dataset), the two arbitrary time-series cannot be compared.

There are other factors/influences to consider too. For example, fishery management actions can alter landings' species composition. Also, suppose a fishery exists for just two species (e.g., cod @ TL 4.5 and haddock @ TL 4.0). If an equal amount of fish is landed for the two species, the mean TL is 4.25. If fisheries managers reduce cod landings and encourage haddock landings,

mean TL for the fishery will decline towards 4.0. A decrease in mean TL's can occur by sequentially adding species that are lower on the trophic level just as well as by declines in higher trophic level species. This is a glaring problem with any TL analysis and implications of TL shifts.

Our reference (above) to a lack of confidence intervals around the mean TL estimates is especially apropos because the alleged reduction in mean TL (Figure 9) occurs within a very narrow range (about 3.8 to 3.95). Figure 9 presents data that makes differences look more impressive than they actually are (Figure 9 difference of about 0.15 TL, but with no confidence limits).

Another key issue you raise and explore is changes in maximum length of different fish derived from National Marine Fisheries Service (NMFS) survey data within Stellwagen Bank. You highlight those "differences" in Figures 39 and 40 (page 79). You rely on a document "in preparation" by Crawford and Cook, and the document is unavailable for review. Their work should be scrutinized because although their conclusion about decreases in maximum length may be correct, both the magnitude and rate of decline likely are inaccurate. Specifically, maximum length in a year will be sensitive to the number of NMFS survey tows within the Sanctuary. Number of tows in a year is not available.

Even though we do not know the number of tows in the Sanctuary, we felt it was worthwhile to reconstruct the data set for white hake based on Figure 39 to illustrate some difficulties with its interpretation. In the white hake example, a linear relationship between maximum length and year is assumed. However, this relationship is highly influenced by both 1965 and 1981 points, and a linear model doesn't fit the earlier years. In reality, the maximum length appears to fluctuate or perhaps slightly increase in the period 1963 through 1980 before declining.

The predicted maximum length in 1963 (as opposed to 1960) is 86.6 with 95% prediction limits of 59.0 - 114.2 cm. The predicted maximum length in 2000 is 47.4 with 95% prediction limits of 19.9 - 75.0 cm. The reduction from 1963 to 2000 was 45%, not 50%. If we use the predicted value of the loess line, predicted length in 1963 is 74 cm to 50.3, a 32% drop.

Additionally, regressions are shown for 15 species (Figure 40), but 8 out of the 15 have P-values that are greater than 0.07 suggesting there are no significant relationships between maximum length and time for these 8 species.

We also wonder whether the authors conducted regressions only on those species that showed declines. They indicate: "...were regressed over time for each of the 15 species studied with comparable findings." It would be useful to know the number of species that did not show decline in size over time.

Regardless of what the data show or don't show, once again we remind you that what happens in the Sanctuary is dependent on what happens outside the Sanctuary. We don't downplay your concerns. We share some of them. However, we caution you not to make a case that Sanctuary-specific restrictions on white hake, for example, will have any meaningful impact on changes in white hake size/age distributions for fish that seasonally reside in or pass through the Sanctuary. Refer to NEFSC assessments for white hake and consider that white hake are found all throughout the Gulf of Maine in deep as well as shallow waters.

Also, consider that focusing on maximum length sampled from any area to prompt valuable BOFFF discussions is insufficient. We suggest you look at relative abundance of those older fish and their seasonal distribution by area. That would be far more meaningful. For example, maximum size of cod west of the Sanctuary in 2005 was 62 inches! Are we to assume that the Gulf of Maine cod resource is in good shape because of this one fish? Have we achieved an age structure better than that assumed for what is guessed to have existed 3,500 years ago? This example reveals potential problems with use of a maximum size approach. A good stock assessment is required with effective federal rebuilding strategies including use of approaches consistent with the BOFFF hypothesis.

### **Ecosystem Management: predator/prey**

Dogfish. One species you did not mention at all, but it is a major component of all fisheries resources that frequent the Sanctuary is spiny dogfish. In fact spiny dogfish can dominate to the dismay of commercial and recreational fishermen. Dogfish biomass – soon to reach the Councils' "biomass target" for mature females (not overfished and overfishing not occurring) – appears to be overwhelming the Sanctuary. There are serious implications some of which are described in the paper by Link et al. (2002), "Ecological interactions between elasmobranches and groundfish species on the northeastern U.S. continental shelf. I. Evaluating predation." (*North Amer. J. Fish. Manage.*). This paper is not in your "Sources Cited," and it should be especially because of their conclusions regarding cod and sea herring.

This NEFSC research has verified that dogfish prey on juvenile cod. Although amount of predation (1998 data) was considered by NMFS to be minimal when compared to predation on other species, an annual amount of 2.2 million cod with most being juvenile fish is consequential especially because that predation likely is localized on inshore, cod spawning and nursery grounds such as those in the Sanctuary (refer to Link et al. pages 557 & 559). According to Link et al., 2.15 million age-1 cod (range from 490,000 to 4.66 million fish) were consumed by dogfish. The cod assessment indicated cod age 1 stock size was 5.77 million fish. Clearly, the potential exists for very significant impacts on cod in the Sanctuary or that will eventually enter the Sanctuary. As cod get larger they move into and through the Sanctuary; therefore, the Sanctuary should take notice of this ecological interaction.

Additionally, according to NEFSC, dogfish consume about 68,000 mt of sea herring (848 million fish) annually. With sea herring also being an important Sanctuary seasonal species and its fishery being a Sanctuary "current challenge" because: "*Herring removal in this amount [7,726 mt in 2005] by fishing reduces the forage base available to marine mammals in the sanctuary and could be a factor in causing local prey depletion and in determining the local abundance of whales and dolphins in the sanctuary*" (page 168). The Sanctuary cannot do anything about dogfish. Management is through the NEFMC, Mid-Atlantic Fishery Management Council and Atlantic States Marine Fisheries Commission (ASMFC). Nevertheless, you need to be aware of this dogfish predator/prey problem that could worsen for the Sanctuary. Additionally, consider that dogfish also eat sand lance.

Sea herring. Currently, sea herring fishing in the Sanctuary is restricted due to a number of factors we outline here. These restrictions were developed by the NEFMC and ASMFC to address "local availability and depletion" concerns. Sea herring is managed with hard quotas, and the quota for the inshore portion of the Gulf of Maine (Area 1A) was decreased significantly

in part to deal with forage base questions. Adequate forage was at the top of the mangers' agenda.

Your focus on the "reduced forage base" (page 113) is appropriate especially in the context of marine mammals. Nevertheless, we suggest you update your discussion and references to be consistent with current thinking, especially NEFSC research. For example, you reference the paper by Overholtz and Link regarding sustainable yield and trophic links. However, their 2006 (not 2007) conclusions were reached after review of GOM and Georges Bank data through 2002. Much has happened since then such as the NEFMC's dramatic lowering of the Area 1A quota and the implementation of a large and extensive seasonal closure to mid-water trawling for herring in the GOM, including the Sanctuary.

Your Figures 71 & 72 and Table 10 are now out-dated and don't reflect what now happens in the Sanctuary. For example, you note that from 1996-2005, 65.5% of herring caught in the Sanctuary were by mid-water pair trawls. The herring fishery has seen substantial changes thanks to a combination of the mid-water trawling closure, ASMFC spawning area closures and restrictions on number of days for fishing, and the relatively low NEFMC/ASFMC Area 1A quota.

Your Ecosystem Alteration Action Plan, Objective EA.3 also needs to be revised to reflect current management of sea herring and fishing in the Sanctuary (page 218). We definitely will work with you to achieve this goal and that includes your desire to prevent a fishery on sand lance from developing.

We recommend you revise the performance measure in Table 43: "By 2009, the key forage species in the Sanctuary, sand lance (sand eels) and sea herring will be protected from local depletion." That timetable is impossible to meet unless NOAA Fisheries takes emergency action to implement a ban on exploitation on sand eels within the Sanctuary. Sea herring activities related to a potential ban cannot be completed until after 2009.

### **Marine Mammals Resource States**

Under "Conservation Status" *population status* is described only for the North Atlantic right whale (page 103). However, the humpback whale is the focus of the whale watch industry and the Sanctuary's whale research program. It is one of the most abundant marine mammals in the Sanctuary. Given this, we recommend you include a description of the population status for the North Atlantic humpback whale. The 2007 NMFS stock assessment found that the Gulf of Maine humpback whale population was steadily increasing in size with an estimated trend of 3.1% for the period 1979-1993 (NMFS Stock Assessment Report, October 2007).

In addition, it would be helpful to provide information about what portion of the humpback whale diet is made up of sand lance versus herring. This information would help the reader better understand the implications of your "reduced forage base" section (page 113). It appears that sand lance continues to be very abundant in the Sanctuary and elsewhere. To what extent would we expect whale abundance and distribution to change and shift in response to sand lance abundance/distribution independent of herring abundance in the Sanctuary?

Under "Whale Watching" the document references the "downside" of the whale watch industry by citing impact studies conducted in other parts of the world (page 105). However, it does not appear any impact studies have been conducted on Stellwagen Bank. The Sanctuary should carry

out an impact study of its own to truly understand the effect this human use has on the local population. It appears that is your intent, and we encourage that research described in your "Marine Mammal Behavioral Disturbance Action Plan" (page 228-231).

Consider that the extensive dataset for humpback whales on Stellwagen Bank is due in large part to the whale watch industry. Most commercial whale watch boats have naturalists aboard who collect photo-ID data contributing significantly to what the document describes as the "longest and most detailed study of baleen whales in the world" (page 92). Consequently, the upside of whale watching should be highlighted; otherwise, your description portrays the industry troublesome, self-serving, and in need of further regulation. Perhaps further regulation is necessary if what you claim is true: "The high degree of non-compliance, however, indicates that whale watching 'guidelines' cannot be relied upon as a voluntary measure to reduce the risk of behavioral disturbance within the Sanctuary." Nevertheless, the industry is your partner, and we wonder the extent to which you already have worked with the industry beforehand to confirm your impressions about compliance based on the "recent survey conducted over several years" (page 229).

You conclude that tuna fishing in the Sanctuary has high potential for interaction and disturbance of whales. The plan states: "*The frequency of hooked whales trailing tuna fishing tackle in 2007 prompted calls from so many whale watch patrons, that it clogged the whale disentanglement hotline, jeopardizing its effectiveness*" (page 107). Actually, only one humpback (Springboard, as seen in Figure 61 on page 108) and one fin whale were seen "hooked" in 2007, according to the Disentanglement Network website. In addition, Springboard was carrying brightly-colored, easily-seen squid tackle. In the aforementioned quote, the Sanctuary equates the high number of calls with a high frequency of entanglement events. That extrapolation is inappropriate. A much more likely scenario is that multiple calls were made about the same animal which was easily detected due to the bright tuna tackle. Tuna gear does interact with humpbacks, but the type of loose correlation made on page 107 does not provide a clear picture of the whale-tuna gear issue.

Entanglement is an important issue for the Sanctuary as it is for the Commonwealth. Your "Entanglement" section (page 111) begins with the first of many statements about the Sanctuary being "*a hotspot for fishing gear entanglements with whales and has the highest number of reported incidents in the GoM.*" There is a strong sighting and reporting bias in the Sanctuary with regards to entangled whales. While the plan mentions this fact, it appears to have overlooked its importance in its analysis. The sighting and reporting bias cannot be ignored when discussing entanglement rates.

We suggest you could better handle this bias issue by having the plan provide information about known entanglements which originated inside the Sanctuary. We recommend you determine how many there have been; what gear was associated with them; and in what area of the Sanctuary entanglements occur. The Draft Plan focuses on biased reporting rates and fails to evaluate entanglements that can be traced back to gear set within the Sanctuary. Some of these data do exist.

Also, you conclude: "*The area in and around the sanctuary has the highest use (combination of spatial extent and density) of fixed gear vessels (gillnet, lobster and other trap/pot fisheries) anywhere along the eastern seaboard of the United States*" (page 111) This statement and the associated plot (Figure 68) are based on federal Vessel Trip Reports (VTRs) and lobster permit-

holder data. Federal requirements do not require universal reporting by lobster permit holders so the data are incomplete. Moreover, the data do not include state permit holders. Without the inclusion of state permit holders who fish fixed gear, it is difficult to determine which area of the Gulf of Maine has the highest use by fixed gear.

### **Status of Human Uses**

Under "Standardized Surveys" you describe methods used during two surveys to map the quantity and patterns of fishing effort in the Sanctuary (page 133). Sightings of fixed gear surface buoys, fixed gear vessels, mobile gear vessels, and baleen whales were collected each month. Gear sightings were corrected for effort per month and expressed as sighting per square kilometer per month, as seen in Figures 69 and 95.

However, there is no temporal component to the maps presented in either Figure 69 or 95, although data were calculated monthly. Gear sightings in Figure 95 are labeled as sightings per square kilometer per month, but the view shown in the map is for the entire year of the survey.

You fail to show the temporal variation associated with the spatial overlap between whales and fixed gear. This variation would be very helpful in identifying areas and times when whales are most at risk. Neither do you explain how you account for the potential dependence of the monthly gear sightings. It appears that the monthly gear sighting per unit effort have been additively applied to create the year-long density plots. The maps should be broken out by month in accordance with how the data were collected to accurately evaluate the spatial-temporal overlap of whales and gear. In addition, you should explain how you dealt with the potential to re-count gear seen during each monthly survey.

Despite this confusing analysis, you use these maps to draw conclusions about the density and distribution of fixed gear in the Sanctuary. You state: "*Comparison of results from the two survey periods between 1994-1995 and 2001-2002 indicates that the area fished by fixed gear in the sanctuary greatly expanded during the interim*" (page 137) No further explanation is offered as to how this conclusion was drawn, and you do not address uncertainties and assumptions in your survey data. Differences in survey area between the two should be taken into account. Was the conclusion that fixed gear greatly expanded based on quantitative analysis or merely on the visual "spread" of gear seen in the map? You should analyze how the monthly sightings of gear might represent a "re-sighting" and if the amount of gear truly increased or just became more spread out?

Some of these questions could be answered by evaluating federal and state fixed gear permit information. Overall, it should be noted that fishermen often move their gear, both long and short distances. Simply re-setting the same gear usually places it in a different location. This fact, along with your inability to say whether the surveys already counted that gear last month, confounds the picture of gear density and distribution presented in Figures 69 and 95.

We have a final note about data used to analyze gear. On page 133, you say: "*The standardized survey data, together with Vessel Trip Report data for the July 2001-June 2002 period, were used for the analyses of spatial distribution and density of fishing in the sanctuary.*" However, VTRs are not the only other source of information about fixed gear in the Sanctuary, aside from surveys. More information can be gained from the Annual Recall Logs and Mandatory Trip Reporting forms used by Massachusetts fixed gear fishermen. These annual reports provide

monthly estimates of the amount of gear fished (including number of buoy lines, starting in January 2009) and the location of the gear fished (statistical area).

### **Marine Mammal Protection Action Plan**

We offer these specific comments on the "Marine Mammal Protection Plan" (page 229):

#### MMBD.1 Objective – Reduce Marine Mammal Behavioral Disturbance and Harassment by Vessels

The plan says the Sanctuary will consider amending Sanctuary regulations to address close approach and vessel speed, in light of past vessel strikes, complaints of whale behavior disruption and non-compliance with whale watch guidelines on commercial boats. The action plan calls for establishing criteria for making those restrictions. In the previous paragraph, the plan states that regulations "seem warranted because the Sanctuary was created in large part to safeguard Stellwagen Bank's historic importance as a feeding area and nursery for threatened and endangered whales."

It would seem that the best reason to create regulations would be an impact study showing that commercial and recreational whale watching was negatively affecting the population in specific ways. But, the Sanctuary has yet to undertake a behavior impact study concerning whale watching within the Sanctuary itself. While whale watching regulations may very well benefit whales, a study on the impact of commercial and recreational whale watching within the Sanctuary is greatly needed. Also, if whale watching regulations are found to be beneficial, who will enforce them? Would these regulations apply to both commercial and recreational (private vessel) whale watching? How will the Sanctuary categorize recreational whale watching?

Page 230, section 1.1: Are some of these behavioral disturbances, such as transiting through bubble nets and separating mother-calf pairs, already prohibited by the Marine Mammal Protection Act? Is this just a matter of enforcement?

#### MME.1 Objective – Aid Disentanglement Efforts

1.3.1 Please elaborate on the type of marking system you mean to better identify which part of the gear is involved with an entanglement (i.e., groundline vs. buoyline, etc).

1.3.2 Surface indicators on fishing gear are already required to bear markings which can be traced back to gear type.

#### MME.2 Objective – Reduce Marine Mammal Interaction with Trap/Pot Fishery

2.1.1 The federal sinking groundline requirement will take effect on April 5, 2009 under the Atlantic Large Whale Take Reduction Plan. Since January 1, 2007, the Commonwealth has prohibited floating groundline in adjacent waters year-round. Many lobstermen who fish Stellwagen Bank have already switched over to sinking line, due to frequent DAM zones in their area and/or the adjacent prohibition in Massachusetts, making it easier for them to fish their gear in either federal or state waters without having to re-rig.

2.1.2 This "weak link" requirement took effect on April 5, 2008 under the ALWTRT.

2.2.3 The State of Maine and the New England Aquarium have been conducting research into the feasibility of modifying buoylines to reduce entanglement risk, including altering breaking strength and number of buoylines. The Sanctuary could benefit from consulting with the aforementioned groups on this subject.

MME.3 Objective – Reduce Marine Mammal Interaction with the Gillnet Fishery

3.1.1 The weak link and sinking groundline requirement for gillnet fishermen are taking place under the ALWTRT.

Marine mammals in the Sanctuary are likely impacted in certain ways by human uses. Mitigation measures specific to the Sanctuary may be required. However, the manner in which the Sanctuary has analyzed potential impact and has made correlations regarding impact does not provide a clear and accurate picture.

Effectiveness of action plans could be greatly improved by conducting a whale watch industry impact study and performing gear surveys which more accurately portray the whale-gear overlap. These surveys could be accomplished, in part, by partnering with the fixed gear industry to increase the independence of Sanctuary gear sightings, as well as by working with state and federal resource management agencies to use the permit system to elucidate gear density and distribution in the Sanctuary.

**Conclusions**

We congratulate you and your staff for completing this major task after so many years of hard work by your office and the SAC. But, as we have emphasized, the Draft Plan draws premature conclusions before action plans have been implemented. This suggests a pre-ordained outcome that will alienate nearly every historic user of Sanctuary resources. The Draft Plan's view of "modern use" seems to equate to non-use of the Sanctuary. The plan must be reasonable and accommodate stakeholders to ensure their valuable political support.

We continue to offer our assistance to the Sanctuary. We anticipate working with you and your staff on your action plans.

Sincerely,



Paul J. Diodati  
Director

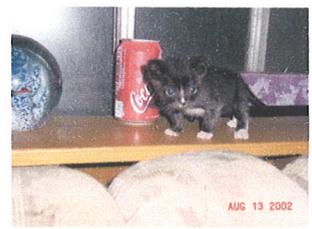
Cc: Commissioner Griffin, DFG  
Massachusetts Marine Fisheries Advisory Commission  
Paul Howard, NEFMC  
Patricia Kurkul, NOAA Fisheries  
Nancy Thompson, NEFSC



Linus eating



Linus playing piano



Little Linus with Coke

*[Handwritten scribble]*

**Eva Hofberg**  
**824 W. 15th Street, #27, Newport Beach, CA 92663**

Aug 28, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
9/2/08

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

I urge you to revise the draft plan to contain the following in the final plan:

- Develop regulations immediately to reduce whale disturbance by all commercial and recreational vessels;
- Develop a zoning plan immediately with accompanying regulations that designate no-take research reserves and limited-use areas in addition to areas for commercial and recreational use;
- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Please help to save animals!

Thank you.

Sincerely,

*Eva Hofberg*  
Eva Hofberg

Aug 28, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
9/2/08

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,

Mr. E. A. Gerster  
9325 SW 77th Ave Apt 247  
Miami, FL 33156-7924



RECEIVED  
9/2/08

Ms. Dawn Keur  
510 S Marion Ave  
Sandpoint, ID 83864-1151

Aug 28, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,

Ms. Dawn Keur

~~SECRET~~

Aug 29, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
9/4/08

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Mrs. Jessica Eisenhauer  
21 University Ln  
Colchester, VT 05446-7936

Aug 17, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
9/5/08

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection. Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Ms. Elizabeth Winkler  
1409 Twin Trails Dr  
Fenton, MO 63026-4229

Aug 11, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
9/4/08

WSP

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Ms. Wendy Perrina  
907 Dutchess Tpke Apt 4  
Poughkeepsie, NY 12603-1549

RECEIVED  
9/8/08

Sep 4, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

Dear Superintendent MacDonald,

I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I am very concerned that New England's only Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

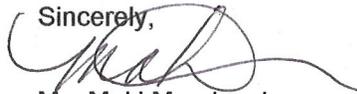
Your plan contains compelling information that the Sanctuary's biodiversity is at risk, that endangered whales are impacted by vessels and loss of their food sources, and that human activity, particularly fishing, is compromising the purpose of the Sanctuary. Time is of the essence. The proposed action plans should include detailed regulatory proposals for immediate development and implementation.

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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you.

Sincerely,



Ms. Maki Murakami

3 Pheasant Ln

Monroe, NJ 08831-1906

Sep 9, 2008

Superintendent Craig MacDonald  
175 Edward Foster Road  
Scituate, MA 02066

RECEIVED  
9/15/08

Dear Superintendent MacDonald,

I am writing because I am very concerned that New England's only Sanctuary, the Stellwagen Bank National Marine Sanctuary, actually provides very little protection for the habitat and animals within its borders, and that your proposed plan does not increase protection.

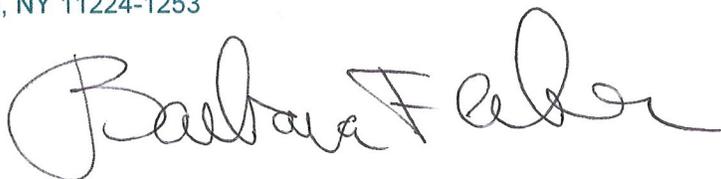
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- Develop regulations to ban fishing on forage species such as sand lance and herring;
- Officially adopt the proposed draft 'Vision' as the Sanctuary's guiding vision.

Thank you for your attention to my concerns.

Sincerely,

Mrs. Barbara Ferber  
3848 Atlantic Ave  
Brooklyn, NY 11224-1253



**Subject:** Final comments on the DMP

**From:** Heather Knowles <hlk@northernatlanticdive.com>

**Date:** Fri, 15 Aug 2008 09:20:49 -0700

**To:** sbplan@noaa.gov

**CC:** Matthew.Lawrence@noaa.gov, Deborah.Marx@noaa.gov, Ben.Haskell@noaa.gov, Craig.MacDonald@noaa.gov, bob@bostondeepwrecks.com, drobinson@fathomresearch.info

Dear Dr. MacDonald,

Attached please find my final comments on the Draft Management Plan. A hard copy of this file, along with the 399 public comments collected via the shipwreck divers website online commenting tool (pre-DMP) have been sent to you via US mail. Thanks for this opportunity to participate in the public commenting process.

Heather

--

Captain Heather L. Knowles  
Northern Atlantic Dive Expeditions, Inc.  
GAUNTLET Diving  
PO Box 154  
Beverly MA 01915  
Phone: (617) 480-5261  
Email: [hlk@northernatlanticdive.com](mailto:hlk@northernatlanticdive.com)  
Web: <http://www.northernatlanticdive.com>

*attached*

**DMP\_MHR\_AP-Knowles-final\_081508.pdf**

**Content-Type:** application/octet-stream

**Content-Encoding:** base64

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
1	2	Aaron	Brown	181 Charles St #3		Waltham	MA	02453	781-572-2825	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	soggy@thedecostop.com	1	2005-09-28 10:32:52	2005-09-20 19:26:18	225ef4624ba520b8e3d2283a25c56668	24.91.148.234
2	3	Craig	Bussel	1660 Center Groton Road		Ledyard	CT	06339	860-464-2075	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	cbussel@comcast.net	1	2005-09-28 10:32:52	2005-09-22 14:41:01	4a651da01182cf56215bfd5243690537	137.99.198.194
3	4	Heather	Knowles	50 Cornell Rd		Marblehead	MA	01945		1	The Action Plan MHR-1 (AP) does not appropriately address the needs of divers. I reject any management plan incorporating recommendations outlined in the AP.	hik329@aol.com	1	2005-09-28 10:32:52	2005-09-28 08:01:14	e1723d78ba3ac5902cbad007c88cf65	206.107.252.26
4	5	Eric	Fine	12 Leland Ave		North Grafton	MA	01536	508-839-1098	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. As a SCUBA Diver. I feel there should be zero restrictions put on by the state regarding shipwrecks. Divers conduct as much, maybe more research into the history and identification of these wrecks than marine archeologists	ericfine50@hotmail.com	1	2005-09-28 10:32:52	2005-09-28 08:45:22	8473ec789c29bfb614cf9b184c37b88	160.79.139.10
5	6	maurice	pentico	504 tryst lane		wake forest	MA	27587		1	Please do not restrict access to our shipwrecks!	pentico1999@excite.com	1	2005-09-28 10:32:52	2005-09-28 08:48:05	6357c554c16249305b66bb649a23f66a	152.3.54.141
6	7	Roman	Plashka	25 Elaine Cir		Bellingham	MA	02019		1	The current action plan is indeed unacceptable. The restrictions are arbitrary and are proposed with no regard to the SBNMS's original intended mission nor in fact the spirit of freedom that is the very foundation of this country.	notabob@gmail.com	1	2005-09-28 10:32:52	2005-09-28 09:01:28	796871ab71f13af6d00407410a6de2f	67.104.73.130
7	8	Robert	Cass	800 Sixth Ave.	20D	New York	MA	10001	212-727-9302	1	I am against any controls or prohibitions on scuba diving on ship wrecks.	bcass1@aol.com	1	2005-09-28 11:56:30	2005-09-28 09:05:12	5d497ed484c1365e6181bf0c7d57d9d	152.163.100.70
8	9	JOSEPH	TERZUOLI	710 TODT HILL RD.		STATEN ISLAND	NY	10304	718 979 7731	1	THE WRECK SHOULD BE OPEN TO ALL DIVERS IN FACT. THE MARINE SANCTUARY IS IN OPEN WATERS (IN PART) AS SUCH ONLY AMERICANS CAN BE KEPT OUT, MUCH LIKE THE MONITOR. THE NUMBER OF DIVERS ABLE TO REACH THE DEEPER WRECKS IS INSIGNIFICANT. THERE IS NO WAY FOR THE GOV. TO PROTECT THESE WRECKS FROM THE RAVAGES OF THE OCEAN. WE SHOULD SEE THEM BEFORE THEY ARE GONE	CAPTZEROOO@ AOL.COM	1	2005-09-28 10:32:52	2005-09-28 09:09:46	4e6ccedd1b067bb7f4c4700d44f1e9c	205.188.116.137
9	10	John	Whitehouse	17 ash street		cohasset	MA	02025	7813830350	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	johnwhitehouse@comcast.net	1	2005-09-28 18:17:25	2005-09-28 09:12:40	df0509b4f5dc87e803b5fd2278d5422d	65.96.40.120
10	11	Dan	Weyant	140 Lost River		Georgetown	TX	78628	512-809-0964	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	dan@weyant.net	1	2005-09-28 10:32:52	2005-09-28 09:15:58	72433a03730495ca135a36b0b7adcbd	207.193.126.66
11	12	John	Lydon	33 Hardwick Road		Ashland	MA	01721	508-881-9005	1	I am in complete disagreement with NOAA's proposed changes to Stellwagen Bank. The public (divers, fishermen, boaters) deserve to have easy access to our nation's resources.	jlydon11@comcast.net	1	2005-09-28 10:32:52	2005-09-28 09:18:55	534c5db8015529b07cda15b14f88aa61	68.15.38.78
12	13	Mike	Ditello	1671 hillsbury dr.		Galloway	OH	43119	614-851-1271	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	mditello@aol.com	1	2005-09-28 10:32:52	2005-09-28 09:21:30	da3ebdec2aa29cd6c24b312bb95692d2	208.14.16.15
13	14	Mark	Munro	2329 Glasgo Road		Griswold	CT	06351	860-376-6458	1	I disagree with NOAA's proposed management changes of Stellwagen Bank which severely limits access to the public.	Mark.Munro@ppo2.com	1	2005-09-28 12:04:55	2005-09-28 09:22:22	9492915b5599a15f5bc1e98b4568d07	158.106.50.3
14	15	Stephen	Cantelli	297 Main Street	Apt# 2	Vergennes	VT	05491	8028771566	1	"I disagree with NOAA's proposed changes for management of Stellwagen Bank". The ocean belongs to the people. It is the people that help to maintain it as well as unfortunately, destroy it. It is our RIGHT as residents of the United States to have access to a natural resource, the Gulf of Maine and the Atlantic Ocean. The State of Vermont has an underwater preservation area for wrecks in Lake Champlain. Divers have minimal restrictions to access these sites but are not forbidden. Please reconsider your proposal.	stevdivesudnh@yahoo.com	1	2005-09-28 10:32:52	2005-09-28 09:27:58	62554b321a9bfc984afdb33ae5e8a38	209.198.99.98
15	16	ian	riddington	2009 trail of madrones		austin	TX	78746		1	I am very concerned about NOAA'S proposed changes for the management of Stellwagen Bank. I think that the plan needs to be reconsidered	ianr33@ix.netcom.com	1	2005-09-28 10:43:58	2005-09-28 09:36:54	6bf93b03cc6d98578cb3860284ec0	24.153.200.104
16	17	Hank	Werner	8 Circle Drive		Merrimack	NH	03054	603 424-4315	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. I want the right for me and my fellow divers to continue diving and exploring these costal waters when and without hassle of getting "permitted".	HankRoundDancer@aol.com	1	2005-09-28 10:32:52	2005-09-28 09:40:56	bb58840a5919fca80c87d94b5fc1f90	161.114.64.75
17	18	Kenny	Taylor	315 College Drive N.E.	Apartment 301	Hanceville	MA	35077	256-352-2636	1	Please donot restrict our diving.	bigken462@yahoo.com	1	2005-09-28 10:32:52	2005-09-28 09:41:07	09616366fc9d635ea27214c555f7759c	72.146.14.190
18	19	Nikolai	Schwertner	92 Chester Rd		Belmont	MA	02478		1	The proposal poses unreasonable restrictions on divers.	nikolai.schwertner@tufts.edu	1	2005-09-28 10:32:52	2005-09-28 09:42:39	7dcf31644fd12c33e1ach34b3cd077ed	24.63.47.24

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
19	20	Devereaux	Clifford	18 Pelham Lane		Wilton	MA	06897		1	The proposed changes to the management plan infringe on our rights as citizens and divers to access shared, national resources. I strongly oppose the changes on this basis, and find the NOAA proposal odious in the extreme for its condescending and elitist position. These are the country's - and therefore each citizen's - resources, not NOAA's private playground.	cliff4@optonline.net	1	2005-09-28 10:32:52	2005-09-28 09:45:52	cc32c1f6825f8b899fde34bf8269308e	67.86.1.139
20	21	Frank	Murphy	155 Webster St., Unit J		Hanover	MA	02339	781-223-8524	1	I strongly urge reconsideration of the proposed restrictions to be placed on fishing and diving in this area. I do not believe that history or education is best served by leaving these resources alone, unseen, and heavily restricted. There is currently no logical basis to restrict public access to these shipwrecks and I feel that special interest groups are driving this legislation and do not have the spirit of public access and education as their guiding principle	woodguys@juno.com	1	2005-09-28 10:32:52	2005-09-28 10:03:20	3a6e57635851ae25afceb91a635cc9a4	4.154.210.73
21	22	Marty	Senetra	10464 Belfast Street West		Crystal River	FL	34428	352.794.0474	1	Leave the Banks open to diving.	marty@birdsunderwater.com	1	2005-09-28 10:52:59	2005-09-28 10:04:51	245b7d9c9bfa3464ce820b11779d24f	65.41.142.200
22	23	Rick	Heineman	13977 Thornapple Dr		Perry	MA	48872	517-282-1010	0	I believe it is possible to regulate recreation out of existence	mrheineman@tds.net	1	2005-09-28 10:53:38	2005-09-28 10:15:02	a93f6a7860c263b5ad8fe89c46d79e9f	69.129.80.192
23	24	David	Morton	3 Grace Drive		Nashua	NH	03062	603-321-9927	1	I strongly disagree with NOAA's proposed plan for managing the Stellwagen bank National Marine Sanctuary, and feel that there is currently sufficient coverage and legislation in place, and that no more is needed.	morton@oasislex.com	1	2005-09-28 10:55:04	2005-09-28 10:20:42	41dee2e18e17ef23a0f6be024d6d9b77	155.212.130.88
24	25	Richard	Yager	77 Morningside Dr.		Grand Island	NY	14072	716-622-8140	1	Public access should not mean only a select few!	dive7156@aol.com	1	2005-09-28 10:32:52	2005-09-28 10:25:26	394948ca0e8cd55f1e368fa916d3a5f	64.65.209.174
25	26	Michael	Zappala	110 Bradley Ave Ext		Methuen	MA	01844	978-771-8906	1	I strongly disagree with NOAA's proposed management changes of Stellwagen Bank. Stellwagen should remain open to divers, as the divers are not the ones harming the environment. Divers can help with the conservation of it in fact.	mikezappa@yahoo.com	1	2005-09-28 10:32:52	2005-09-28 10:31:55	728d0be06e713c88c1789b248ad768a	155.212.133.163
26	27	John	Storer	30 Settlers Path		Marshfield	MA	02050		1	Please do not limit access by tax-paying divers to the shipwrecks of Stellwagen Bank. Divers are some of the most environment-conscious people on the planet. The Federal Abandoned Shipwrecks Act of 1987 requires states to provide access to wrecks. Please do not take this away from diving citizens.	jackstorer@yahoo.com	1	2005-09-28 10:51:55	2005-09-28 10:32:25	804fe376d94373832faed3898544b02b	69.168.70.0
27	28	Owen	Schultz	Lake Toxaway Golf Maintenance	111 Old Tom Morris Way	Lake Toxaway	NC	28747	828-966-9613	1	Whatever happened to government by the people for the people. I have about had it with the government restricting me from using resources that are supposedly "mine" to begin with.	owen.schultz@direcway.com	1	2005-09-28 10:32:52	2005-09-28 10:32:31	f4dc25d0cce1e634654d5279d32f7b8d	207.144.185.193
28	29	Ofc. Rob	Davie	16502 Oxnard Lane		Friendswood	TX	77546	281.615.1916	1	Too often the bureaucrat sees his or her role as that of: "Just say NO!" The people have a right to visit these sites and see them BEFORE they rot silently away, unnoticed by anyone except a few specially appointed NOAA divers.	rob.davie@sbcglobal.net	1	2005-09-28 11:22:37	2005-09-28 10:35:25	6445ac3a09bdf12133b9a02440a879c	70.241.78.52
29	30	David J.	Zappala	14 Martin Ave		Salem	NH	03079	603-896-6373	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Access should remain open! Thank you	kvdivr@comcast.net	1	2005-09-28 10:46:10	2005-09-28 10:45:44	bc234996b7dd2fafa201787944d742d	24.128.220.9
30	31	Dennis	St Germain	169 Bellevue Avenue		North Smithfield	MA	02896		1	Do not restrict access to law abiding, tax paying, free Americans!	dennisstgermain@cox.net	1	2005-09-28 16:56:18	2005-09-28 10:57:49	33d2d988b137edc27451c9dcabe4992b	68.15.62.39
31	32	Michael	Pelletier	24 Vandy Drive		Griswold	CT	06351	(719) 930-1060	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.....	Mpellet937@aol.com	1	2005-09-28 17:46:42	2005-09-28 10:59:40	6f6005dc9cb1b1541c923f31e8d4512	66.212.204.51
32	33	Erik	Van Dorn	959 Rabbit Ear Pass		Victor	NY	14564		1	This will effect my travels to Mass to do diving, which is a result in dollars in the Mass. economy. I am not the only person that travels to Mass to dive Shipwrecks.	erik@mendonpipeline.com	1	2005-09-28 11:11:05	2005-09-28 11:08:08	cc2169d7af8ac48c0bb88190c6604b19	24.39.230.41
33	34	Tim	Cotton	106 Bristol Lane		Birmingham	MA	35242	205-980-1972	0	Public lands must not deny public access, unless there is an overriding need for exclusion. The need for exclusion has not been demonstrated by the government.	tcotton106@charter.net	1	2005-09-28 13:06:00	2005-09-28 11:09:11	d8e659201d3b4632cb834b50cd5f2172	24.196.14.11

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
34	35	James	Herbert	7233 East Lake Road		Westfield	NY	14787	716-326-3722	1	I operate Osprey Dive Charters, Inc. located on Lake Erie on the shores of NY. Our community and the surrounding communitys benefit greatly from the 2000 plus divers that come from all over the world to dive the well preserved shipwrecks that date back to the war of 1812. This kind of legislation would be devastating to my business and to the communitys that benefit from the visiting divers. Lastly, I would like to thank you for bringing this to the diving public before it is to late. James Herbert, Osprey Charters, Inc.	osprey@cecomet.net	1	2005-09-28 11:34:49	2005-09-28 11:12:02	12cfe7550bf609b8e85f708953d5d7	66.243.218.13
35	36	Antonio	Simonini	342 E62nd street	Apartment 20	New York	NY	10021	212-319-6323	1	I strongly disagree with NOAA's proposed changes for the management of Stellwagen Bank. These changes are an unacceptable limitation of personal freedom and only serve the purpose of special interest groups. Lets keep this country free please.	diver@ximox.com	1	2005-09-28 11:40:15	2005-09-28 11:27:15	cf6973dd648dcb4c46494b1d0982e81	12.45.1.186
36	37	Jim	Maffett	8595 Carriage Hill Dr.		Warren	OH	44484		1	Just would like to say that all wreck sites should be accessible to all divers and researchers to study and enjoy. History is history and should be enjoyed by all who can access it.	jmaffett@jarotrans.com	1	2005-09-28 11:45:31	2005-09-28 11:43:47	b4bf35be5e9d9425e05487b6f2f76ede	65.40.136.67
37	38	Christopher	Pearson	5500 Kenbridge Drive		Highland Heights	MA	44143	440-449-2246	1	Passage of this will adversely affect wreck diving in the preserve.	christopher.pearson@tri-c.edu	1	2005-09-28 11:49:33	2005-09-28 11:49:15	7d93300827069b92e389b02c49e60adb	141.110.76.21
38	39	William J.	Madden	1652 Worcester Drive		Pittsburgh	PA	15243	412.276.2820	1	As an avid wreck diver I strongly disagree with the proposed changes.	wmadden@hs.pitt.edu	1	2005-09-28 11:51:24	2005-09-28 11:50:59	87ccdf6a57233ca6c513f75672a512b6	136.142.46.17
39	40	John	DeRoo	30 West Main Street		Hopkinton	MA	01748		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	jderoo@alum.mit.edu	1	2005-09-28 11:55:01	2005-09-28 11:54:34	3e56b12723d9a7efd2cbe2e86344e337	192.18.128.13
40	41	Joseph	Steffen	360 Dumbarton Blvd.		Richmond Heights	OH	44143	216-531-9174	1	I am against the proposed restriction placed on the wrecks in the marine sanctuary.	jsteffen@hotmail.com	0	0000-00-00 00:00:00	2005-09-28 11:56:47	c90e2a60321aff6bf03066e0dadad2da	69.171.60.166
41	42	Matthew	Silvia	23 Alrick Rd	#1	Quincy	MA	02169		1	Public access sites should not require notification.	msilvia7@comcast.net	1	2005-09-28 12:01:38	2005-09-28 12:01:00	072c15e95a3a76731a33654101d1ccfe	12.0.39.130
42	43	JIM	ST GERMAIN	44 BURNT SWAMP ROAD		CUMBERLAND	RI	02864	401-447-3388	1	I have recently learned about proposed regulations limiting and / or prohibiting SCUBA diver access and related activities within Stellwagen Bank National Marine Sanctuary. This appears to be yet another example of environmental lobby groups and the ignorant pushing regulations that will in no way serve to protect the underwater environment. Having been a SCUBA diver for approximately 20 years, I have not witnessed any SCUBA diving activities that have threatened our underwater environment here in the North East. Limiting or prohibiting access to shipwrecks within the sanctuary is comparable to not allowing us to take a walk through our national forest to enjoy its majestic beauty. What a disgrace.	JIM.STGERMAIN	0	0000-00-00 00:00:00	2005-09-28 12:02:00	3e6aa674a1a1009cece61806333d1d68	167.219.88.140
43	44	Kenneth	Rutt	P.O. Box 867		Brooklyn	CT	06234		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	ken@raxafarian.com	1	2005-09-28 12:08:21	2005-09-28 12:08:00	779eca9c3cef6c93a8e5e46f88f18	68.118.198.157
44	45	brian	harris	124 Keller Ave		kenmore	NY	14217		1	Do not restrict access to wrecks by scuba divers. They can be your front line supporters for conservation. They are in a better position to voice to non divers the decline state of ocean resources. Not allowing them to view ship wrecks makes it harder for them to support rest of the good conservation efforts you are trying to do. The efforts to replenish the ocean should be much higher priority then letting a small number of divers not visit and view a wreck site.	brian_harris@hanfordbay.com	1	2005-09-28 14:56:49	2005-09-28 12:10:54	581904fd587031a54f52b0ad3a39b737	64.179.79.47
45	46	Andrew	Favata	3958 Berger ave		Bethpage	MA	11714		1	Avid wreckdiver, registered voter	divrude2000@yahoo.com	1	2005-09-28 19:29:52	2005-09-28 12:21:20	63915a101c7f3cfd9648043c0deaff	24.47.171.34
46	47	John	Bricker	121 Bixley Heath		Lynbrook	NY	11563		1	I strongly disagree with NOAA's proposed changes for the management of Stellwagen Bank.	wracker123@yahoo.com	1	2005-09-28 12:32:01	2005-09-28 12:28:12	eee626a6ae4b296239a33cbf53f927	24.188.141.70
47	48	Sara	Van Keuren	150 Powell Ave		Springfield	MA	01118	413-250-5211	1	Please do not close down Stellwagen Bank!	sdvive3@hotmail.com	1	2005-09-28 12:39:57	2005-09-28 12:37:31	3ec1766b0cbbdf65f3c577b0924745d6	12.31.97.44
48	49	steve	bielenda	po box 888		millier place	NY	11764	631 744 7800	1	Please get the input from local divers and do not limit there access to the site	wahooo@optonline.net	1	2005-09-28 13:31:35	2005-09-28 12:50:37	8bfb256d55514939fa15d9e375267f65	24.190.24.250
49	50	Jan	Polex	37 Burdette St		Dracut	MA	01826	978-957-5391	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. This is Public Property Not NOAA's	polex@psicorp.com	1	2005-09-28 13:11:39	2005-09-28 13:07:53	de8bc8a168d0006b325122d7c3485db4	64.69.116.190

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
50	51	Larry	Slomski	19631 Porky Street		Saegertown	PA	16433	814-756-2391	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank, and any other restrictions on shipwreck diving, in my opinion as a researcher as well as a shipwreck diver the majority of the shipwrecks are located by divers and respected totally for their historic value to be enjoyed by all not governed by a few	larrys@mdvl.net	1	2005-09-28 13:12:35	2005-09-28 13:12:05	6906b946f707bc11afd38d33ca61306	63.173.34.152
51	52	JAMIE	ZEGHDANI	1700-1 WIND WILLOW WAY		ROCHESTER	MA	14624	585-370-7726	0	STOP THE RESTRICTIONS ON SHIPWRECKS IN Stellwagen	BESTROCHESTER@FRONTIERNET.NET	1	2005-09-28 13:32:14	2005-09-28 13:29:07	57a802b3b049f4c31e1b175178d4ebb	209.63.178.163
52	53	Bart. P	Malone	25 Brown Ave.		Bellmawr	NJ	08031-1233	856-931-3542	1	When will The Politations stop taking my rights away for the benefit of them self	bartifacts@comcast.net	1	2005-09-28 13:33:08	2005-09-28 13:31:00	f50d1ab771c3d1b8e28db637ff5fa1e4	69.253.178.77
53	54	Allison	Vitsky	13 Dover Rd		Natick	MA	01760		1	In restricting divers' access to these wrecks, you are ("protecting" them from those who add greatly to the public's knowledge about them. Many of us - even the most nonexploratory, recreational divers - regularly visit local wreck sites and spread their stories throughout the nondiving community.	avitsky@comcast.net	1	2005-09-28 14:51:21	2005-09-28 14:09:39	3b7b2304043fb6c0d5aa18058226a48c	199.245.32.11
54	55	Charles	Johnson	5943 Davie St.		Clover	MA	29710	803-831-9020	1	Access to shipwrecks in US waters should be given to all US citizens and not just special interest groups.	charles@gorilladiving.com	1	2005-09-29 10:02:12	2005-09-28 14:34:58	4fa14796304c37f68d06a8f92de776a3	207.203.88.15
55	56	Andrew	Honeychurch	150 Central AVENUE		Fredonia	NY	14063	716-679-5603	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	ahoneych@netsync.net	1	2005-09-28 14:39:03	2005-09-28 14:38:03	5d92b774ad9e066d85f624cfc58cc8ec	168.169.122.86
56	57	James	Donohue	20 Wolf Hill Rd.	Unit 8H	Wolcott	CT	06716	203-879-7194	1	As a diver, one of the most enjoyable aspects of my life is shipwreck diving. Not for the glory, not for artifacts but simply seeing a rusted hulk sitting silent on the ocean bottom. Most divers are conservationists at heart. Any perceived threat to marine life is completely unfounded. Please don't stop us from enjoying the things in life that we live for.	jdonohue@mcintireco.com	1	2005-09-28 14:45:59	2005-09-28 14:45:47	5b66f70f691c3e5d5777de48e8566130	66.153.69.202
57	58	barry	curran	po box 143	1 briarcliff lane	hamilton	MA	01936	6178845946	1	the original intent of the sanctuary was to protect from gravel excavation and oil drilling. this oversteps any of the original framework	hubairinl@msn.com	1	2005-09-28 15:10:24	2005-09-28 15:02:17	a06befbfe30b10fde83d5e0fedfe8140	192.204.186.172
58	59	Marc	Beaudry	45 Treasure Road		Maple	MI	L6A 2Y7	905 832 8044	1	I am a Canadian resident. I also protest the actions of individuals trying to restrict the rights and freedom of others to where they go to explore and enjoy our marine heritage. There is no other place or museum you can go and see the history like the many shipwrecks that lay in bottom of our lakes, rivers and oceans. It is a tribute to the many people that lost their lives for the history is relived everytime we visit these time capsules.	mbeaudry007@sympatico.ca	1	2005-09-28 15:17:57	2005-09-28 15:12:04	573fc9d404481890933a4f50f28d7f	67.70.64.218
59	60	David	Caldwell	5 Treetops Lane		Danvers	MA	01923	978-750-4851	1	I am greatly opposed to The Stellwagen Management Plan, the plan prohibits the "right of access" to a natural resource. This plan will set a precedent for future Marine Sanctuaries to prohibit access if this plan is passed. We as US citizens have the right of access to our natural resources.	djc@northernatlanticdive.com	1	2005-09-28 15:20:47	2005-09-28 15:19:22	6cc762761550ac2be16ea41b34416b80	151.190.254.107
60	61	Dave	Dornay	710 Central Avenue		Dunkirk	NY	14048	716-366-2944	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	graypaystation@scubadiving.com	1	2005-09-28 15:43:31	2005-09-28 15:41:40	6c4c00de399a7566504dba3f3ea7a1b4	208.15.25.179
61	62	William	Sternecker	8663 Kennard Rd.		Lodi	OH	44254	330-948-3156	1	As an avid wreck diver and member of the Marine Archeological Survey Team I feel that arbitrary restriction of shipwrecks to divers is a violation of our rights. Amateur wreck divers find and survey more shipwrecks than any agency can possibly survey. Our level of care and concern for these wrecks is above question. We provide the only ongoing monitoring of the status of most wrecks before government sponsored surveys can get them on a survey list. Please see that the resources of this large number of citizen wreck divers is not wasted by restricting our access to these wrecks.	wsternecker@neo.rr.com	1	2005-10-01 19:41:45	2005-09-28 15:56:19	b5b11b27246de17e4a16920e970cae8	24.164.105.228
62	63	jack	cherney	4547 valleyview dr		west bloomfield	MA	48323		1	The proposed regulations are way "overboard" and far too heavy-handed.	divesafe@gmail.com	0	0000-00-00 00:00:00	2005-09-28 16:05:19	4c0e2283f2250442872787c3bdef79d1	24.221.72.10

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
63	64	Phillip	Jones	25241 conrad court		damascus	MD	20872	301-253-3116	1	I strongly disagree with the proposed NOAA management plan for the Stellwagen Bank National Marine Sanctuary, for many reasons. Please feel free to contact me for detailed reasons. Phillip Jones, Maryland, USA	ncwannabe@msn.com	1	2005-09-28 16:06:06	2005-09-28 16:05:41	11ee42481eaf6979751139218fd5d865	138.88.136.243
64	65	Anthony J.	Glennon	334 N. Albany Ave		Massapequa	NY	11758	516-752-4090	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	aglennon@optonline.net	1	2005-09-28 16:19:23	2005-09-28 16:12:07	fab06df61488007c0f8c24842491782	4.43.38.100
65	66	Matthew	Grein	166 Magazine St		Cambridge	MA	02139		1	I do not agree with NOAA's proposed changes for the management of Stellwagen Bank. I ask that you reconsider, as the changes will have adverse effects on scuba diving and exploring around and near shipwrecks in the Bank.	megrein@alum.mit.edu	1	2005-09-28 16:20:52	2005-09-28 16:16:30	cf51b3e0169bbbd1effa26980e854824	129.55.200.20
66	67	Elisabeth	Sylvan	42 Curtis Avenue		Somerville	MA	02144		1	Thank you.	lisardme@yahoo.com	1	2005-09-30 17:40:26	2005-09-28 16:20:46	895c22c0c4ebfc48592e2e0e1e12631c	18.85.18.70
67	68	James	Helmuth	2010 Kansas Ave NE		St Petersburg	FL	33703	(727) 525-5841	1	Public lands (submerged or otherwise) should remain free to the taxpayers so long as they are kept in tact and are not "raped" or damaged such that they are not available to the public in future generations.	jhelmuth@kronos.com	1	2005-09-28 16:23:18	2005-09-28 16:22:37	208eedf52de8d4b9d4bc45aff2762ad	158.228.250.166
68	69	Darlene	Starr	P.O.Box: 6206		Christiansted	VI	00823		1	Massive over regulation does more harm than good.	darlene@techdive-vi.com	1	2005-09-28 16:43:54	2005-09-28 16:25:58	007019d7141ede2deca3917e75633d03	208.30.109.146
69	70	Nate	Hathaway	161 South St. Apt 6		Jamaica Plain	MA	02130		1	I also disagree with NOAA's proposal for the management of Stellwagen Bank, and think almost all areas of the ocean should be accessible to the public	natehat@hotmail.com	1	2005-09-28 16:26:37	2005-09-28 16:26:16	44da25360bf01f6045cb5c891aa2af6	134.174.170.76
70	71	Keith	Thoresz	128 Magazine St.		Cambridge	MA	02139		0	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	thorek1@yahoo.com	1	2005-09-28 16:28:58	2005-09-28 16:28:37	516c9760a63288a9076880adb6b5d77	204.9.221.20
71	72	ALLEN	PERKINS	1303 Conrad Dr.		NEW SMYRNA BEACH	MA	32168	389-409-7313	1	More government intrusion is not a thing welcomed by it's citizens .	PERKINS194@AOL.COM	0	0000-00-00 00:00:00	2005-09-28 16:31:10	8d68643fd1e6597db0c240304b43b85d	64.12.116.70
72	73	Colin	Davidson	639 East Main Street	Suite 103-B	Hendersonville	TN	37075	615-824-0021	1	freedom includes public diveable wrecks!	colin@wmbinc.com	1	2005-09-28 16:32:53	2005-09-28 16:32:29	bce776f42f661cbe2b156e42924f161c	68.17.115.34
73	74	David	Schloerb	16 Mt. Auburn St.		Cambridge	MA	02138		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	schloerb@mit.edu	1	2005-09-28 16:42:49	2005-09-28 16:42:04	5e02f1a5cfd4906196439fca0ebdd139	18.62.12.244
74	75	Richard	Hann	7934 Buffalo St Ext		Bergen	NY	14416		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	lodgetender@hotmail.com	1	2005-09-28 16:43:44	2005-09-28 16:43:19	4c595c64cab3a2695fa67a3ccf2687a7	66.67.36.116
75	76	Daniel	Stutenroth	21 W. Springville Road		Boiling Springs	MA	17007	717-258-5277	1	reconsider proposed changes	daniel@facarisle.com	1	2005-09-28 16:47:47	2005-09-28 16:45:25	63dc9dccc5ccfc529a188ed13d05dbf11	12.108.100.139
76	77	Patrick	Garon	20 Page St		Canton	MA	02021	617-851-4997	1	na	Patrick@pgaron.com	1	2005-09-28 17:23:57	2005-09-28 17:05:53	82f6b3d9803e43c894f5c0ef682d1b3	143.165.168.50
77	78	Tim	Owens	222 N. Columbus Dr. #1112		Chicago	IL	60601	312-543-8296	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. The public deserves unfettered access to these sites.	netmage2112@gmail.com	1	2005-09-28 17:14:53	2005-09-28 17:10:07	2070aea4f7840255d43c63eda5e27073	165.125.8.17
78	79	Paula	Nunes	214 Erie Street		Cambridge	MA	02139		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. The public should have access to shipwrecks.	pantsfirstshoes@hotmail.com	1	2005-09-28 17:18:53	2005-09-28 17:18:35	b16d997a92b345d8670dedec41827cf8	65.96.173.212
79	80	Christopher	Walt	273 Nehoiden St.		Needham	MA	02492		1	To Whome it May Concern, I would request that this proposal and any related management plans derived from it be revised to incorporate a more reasonable and practical approach to managing shipwreck diving activities. Any plan should permit and facilitate visitation of Stellwagen Bank National Marine Sanctuary and the resources contained within it. Respectfully Submitted, Chris Walt	large_diver@scubadiving.com	1	2005-09-28 23:37:46	2005-09-28 17:25:02	7f56c926bf659d05feaecca573e3cde5	198.180.131.18
80	81	Stephen	Perdue	60 Wadsworth St. #12G		Cambridge	MA	02142	(617) 877-5740	1	Limiting access to the diving community is an aggressive act of limiting public knowledge of these important historical monuments. The diving community as a whole is self-managed in terms of safety and respect for the ships and poses no threat to these landmarks or the marine environments in which they reside. This legislation is yet another attempt to remove the public from direct interaction with our history. It is unnecessary and unlawful.	stephenperdue@yahoo.com	1	2005-09-28 17:27:32	2005-09-28 17:25:52	26f41fc886e99b684587002e7c273a28	18.97.6.85
81	82	zach	albert	8724 appleridge ct		carlisle	OH	45005	5139197747	1	I don't want ship wrecks controlled in this way	ohiosound123@yahoo.com	1	2005-09-28 17:40:11	2005-09-28 17:37:06	99099aa09cb1324b559e67e55927ba1d	66.161.131.50
82	83	Tim	Richards	474 W. Prairie Street		Sequim	WA	98382	360 683-2440	1	Wrecks must remain open to the public	tim@nwsmedical.com	1	2005-09-28 18:08:28	2005-09-28 18:03:20	b296d0d7a76652631fd9388b34bbd02e	65.117.225.131
83	84	Trish	Boyer	10194 N. Old State Road		Lincoln	DE	19960	302-422-3483	1	I vehemently disagree with NOAA's proposed changes for the management of Stellwagen Bank.	surf@surfaceinterval.net	0	0000-00-00 00:00:00	2005-09-28 18:11:14	de3e0bba180825912215a53a167e055	68.33.7.119
84	85	John	Chaplain	3 David Circle		Stoneham	MA	02180		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	johnchaplain@comcast.net	1	2005-09-28 21:08:39	2005-09-28 18:27:12	25695cef1b65e04659c5d197da1a4d7	66.30.216.252
85	86	Ann	Irza	10 Garfield Lane East		Andover	MA	01810		1	This is a nonsensical proposal. Please reconsider access rules, which make no sense. Thanks	anni@sygnus.com	1	2005-09-28 18:47:34	2005-09-28 18:47:18	44dbf42875bbefc727c97d1693b2b39	66.31.125.71

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
86	87	Michael	Struchen	3800 Center RD		Conneaut	OH	44030		1	Not only do I disagree with NOAA's proposed changes for the management of Stellwagen Bank, but I would more adamantly oppose this type of "management" in/on the Great Lakes!	simflyr@suite224.net	1	2005-09-28 19:23:05	2005-09-28 19:19:56	2d08acff1cd0b5db31d7e468b1d54753	72.2.81.174
87	88	Louis	sarkas	177 Pine Street		Yarmouth Port	MA	02675	508 3627433	1	Independent diving of shipwrecks can actually increase the preservation efforts, than hamper them. By actual visualization of deterioration, shifting of sands, and unsanding of wrecks, a majority of divers look to preserve wrecks, especially in salt water where there time is limited, before they are gone forever. will the tide and weather also be restricted from being near these historical wrecks? they seem to be able to do more damage than any single diver!	lsarkas@hotmail.com	1	2005-09-28 19:39:17	2005-09-28 19:39:07	32369864fac141a3c3dc77eb413dc6b5	129.44.187.77
88	89	Don	Ferris	PO Box 766		East Sandwich	MA	02537		1	We have the right to dive in Stellwagen and visit ALL of its shipwrecks. The Federal Abandoned Shipwrecks Act of 1987 requires that states facilitate access to shipwrecks. We ask that national marine sanctuaries comply.	don@donferris.com	1	2005-09-29 08:22:12	2005-09-28 19:48:14	23ec7d6b0731ebcd84a49e60c7871ae	69.164.88.32
89	90	Gaeton	Godios	13 Edith St		Tonawanda	NY	14150		0	The entire treatise of this proposal for management of the site is without firm and concrete timing. I don't believe the public as a whole and divers in particular are served by this amendment and proposed plan. The public access part is really not suited for public access either. Please don't waste my tax dollars on legislation that has intent on prohibiting myself and other tax payers from enjoying the natural marvels and historic naval heritages. Thank you for your attention to this matter. Guy Godios	squirrel2hd@yahoo.com	1	2005-09-28 20:01:23	2005-09-28 20:00:53	1b06fe10c261fae48fc1b7f91f61c8f8	69.161.90.249
90	91	Date	Swift	1636 4th Ave.		Yuma	MA	85364	928-783-2118	0	I disagree with NOAA's proposed changes to the management of Stellwagen Bank!!	diving@scubacowboys.com	1	2005-09-28 20:17:51	2005-09-28 20:14:26	371287dc3a2803aad6a351e082e5f2c	69.167.23.122
91	92	Laura	Martin	42 Zollars Ave		Buffalo	NY	14220	716-826-9185	0	I AM IN DISAGREEMENT WITH NOAA'S PROPOSED CHANGES TO THE MANAGEMENT OF STELLWAGEN BANK. IT IS NOT ONLY UNFAIR TO DIVERS BUT TO THE GENERAL PUBLIC AS WELL. EVERY ONE SHOULD HAVE THE RIGHT TO ENJOY THESE SITES. THESE WRECKS ARE PART OF ALL OF OUR HISTORY AND SHOULDN'T BE RESTRICTED TO ONLY A FEW.	snowback13@msn.com	1	2005-09-28 20:21:38	2005-09-28 20:21:21	f269bb8171722850eaafc6d5bf814b4c	70.104.47.73
92	93	David	Swift	617 Captain Cooke Way		Chesapeake	VA	23322		1		techdiver@cox.net	1	2005-09-28 20:25:58	2005-09-28 20:23:26	cccafa545065ca4052c702e8954b5ed	24.254.237.204
93	94	Ted	Green	1710 S. Mill Dr.		Salisbury	MD	21804		1	Total waste of tax payer dollars!	tedgreen22@yahoo.com	1	2005-09-28 20:25:10	2005-09-28 20:23:50	3a2008466a7df8966cf80a9c5627523d	69.250.15.248
94	95	Jerry	Blaski	284 Candee Ave		Sayville	MA	11782	6312443690	1	We as divers - but most importantly as the tax-paying public - have the right to dive in Stellwagen and visit ALL of its shipwrecks - and that includes the PORTLAND, the Palmer/Crary, etc. The Federal Abandoned Shipwrecks Act of 1987 requires that states facilitate access to shipwrecks - why should national marine sanctuaries be any different?	jblaski@optonline.net	1	2005-09-29 09:25:32	2005-09-28 20:24:40	4d550397b4d936b712fd6b901c50938	24.186.238.203
95	96	Tyler	Stalter	10730 frank daniels way		san diego	CA	92131		1	history will be lost.	tylerstalter@hotmail.com	1	2005-09-28 20:51:28	2005-09-28 20:47:37	df3e389a34b0a65e9ba7c84df65e8db	66.75.234.55
96	97	Robert	Overstreet	820 W Bigelow Ave Apt 81		Findlay	OH	45840		1	Please do not implement NOAA's proposed changes to the management of Stellwagen Bank, as it pertains to wrecks.	rebar416@gmail.com	1	2005-09-28 21:13:54	2005-09-28 21:13:32	69214d1663fe7c73cb5aa6a5e43334e7	65.185.184.7
97	98	William	Crossen	1 Moulton Park Road		Framingham	MA	01702	508-875-1709	1	I do not agree with NOAA's proposed changes for diver's access and their management of Stellwagen Bank. Please reconsider actions being considered to limit diver's access to wreck's in this National preserve. Thank you Bill Crossen	bcrossen@verizon.net	1	2005-09-28 21:19:54	2005-09-28 21:17:10	7ed6cc3e5a637df21f5d19f3d9368fd	151.203.246.92
98	99	William	Heffelfinger	One Sassafras Lane		Greensburg	PA	15601		1	I strongly disagree with NOAA and their proposed changes for the management of Stillwagen Bank. Let us keep Democracy in this great country.	heff33@comcast.net	1	2005-10-04 20:31:02	2005-09-28 21:33:50	849b40b405c3697b210b59c03eca28be	67.165.52.135
99	100	Paul	Hartwick	3522 D Farmington Drive		Greensboro	NC	27407	336-209-2024	1	I strongly believe that divers should be allowed to dive the shipwrecks in the sanctuary without the proposed "restrictions".	pjh343@yahoo.com	0	0000-00-00 00:00:00	2005-09-28 21:54:37	29e1473b0b5d1964741468b626366aa	24.136.176.147

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
100	101	Frank	Pellegrino	19 Altmore Place		Staten Island	NY	10306	(917) 589-4705	1	We Live in the USA. NOT COLD WAR RUSSIA. Most Ocean wrecks will be gone in a short time by natural erosion. Let diver/fisherman enjoy and benefit from them while there still there. Its great for the economy and America to have FREE access to these sites. IT'S THE AMERICAN WAY OF LIFE!	alohaf Frankie@juno.com	1	2005-09-28 22:15:29	2005-09-28 22:04:44	83b43304063cd20b4438cd73cee91c81	4.237.221.13
101	102	Steve	Sobczak	18 caddy pl		rocky point	NY	11778	2039963429	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	tolatchimnycare@yahoo.com	1	2005-09-28 22:25:20	2005-09-28 22:20:56	45bc0d47db83b07b6c70bc4141fd089	24.190.20.136
102	103	Derek	Smith	2135 Clifford Ave		Rochester	NY	14609	585-733-7207	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Other than wrecks, we have very little to dive here in the NE. Please do not take this from us, especially those of us who have to travel from out of state to see such wonderful "windows to the past".	BOSS10L@yahoo.com	1	2005-09-29 14:15:35	2005-09-28 22:39:53	afad75efb41a631e4871803baf3d5c81	67.139.66.216
103	104	Kenneth	Keane	3416 McKinley Pkwy #H-3		Biasdoll	NY	14219	716-826-4343	1	I am a scuba diver and strongly desire access to wreck sites.	kenk1969@hotmail.com	1	2005-09-28 23:53:31	2005-09-28 23:52:02	5c520e0d9074a47528aed432fcee0b8b	71.243.159.226
104	105	Uwe	Lovas	6607 Marsh court		Fredericksburg	VA	22407		1	This plan is all about restricting access to the open ocean to a few select individuals in government and academia, nothing more. It is a fraud foisted upon the public by self centered, power hungry bureaucrats. I am writing to my representatives in Congress. I believe NOAA is a great place to start slashing budgets when looking to reduce the national deficit.	wrckdvr@aol.com	1	2005-09-29 00:05:51	2005-09-29 00:05:08	2b9578e1d417ee7048485e1d1d1c1f82	64.236.208.25
105	106	Kenneth	Farnsworth	49058 Peck-Wadsworth Rd.		Wellington	OH	44090	440 647 6388	1	Preserve, protect, but don't prohibit our access to diving shipwrecks. Use the example of the laws in the Great Lakes. These laws work for shipwreck preservation, while still allowing access to the wrecks by shipwreck divers. There is no need to restrict our access to these underwater time capsules, so please don't.	mail@tncs.com	1	2005-09-29 01:18:31	2005-09-29 01:16:39	bad5474ca598ff218ee0562c2aaf620	67.129.203.110
106	107	Michael	Lakin	4630 French Rd.		Alpena	MI	49707	989 356-4543	1	The restrictions of NOAA is very unfair. If this is allowed to happen at Stellwagen what about here in the Thunder Bay Underwater Preserve here in Alpena, or the other preserves around the world. This was one the topics brought up during the designation process here in Alpena, and NOAA said that the preserve would not affect recreational fishing, boating, or diving. Two thumbs down to NOAA.	mlakin_1@charter.net	1	2005-09-29 06:07:23	2005-09-29 05:46:24	cb3631c3b61ec39111ac7f35b66ba7b	68.188.228.187
107	108	Christina	Young	94 Spring Valley Rd.		Hardwick	NJ	07825		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. There is no evidence that the current management plan is deficient, and this proposed one would unnecessarily restrict the rights of citizens to access their own underwater sanctuary.	christina@christinayoung.com	1	2005-09-29 07:01:54	2005-09-29 06:48:18	ebfc7ed0f08deec302c5f481c20a9031	69.69.127.140
108	109	Carlin	Anderson	12355 Twin Sands Trail E		Jacksonville	FL	32246		1	I do not believe that the US government has the right to restrict the personal access & use of natural waters. This is especially true regarding the NOAA's proposed changes for the management of the Stellwagen Bank.	carlanders@comcast.net	0	0000-00-00 00:00:00	2005-09-29 06:51:28	5eeb9d3cf2863d94e753348c66e936ec	24.129.102.178
109	110	Jonathan	Cousins	2171 13th St		Troy	NY	12180		1	I disagree with these proposed changes.	ship@jcnnythan.com	1	2005-09-29 07:12:15	2005-09-29 07:09:26	c7b892993f10f2a99af0b814126c6043	72.224.119.252
110	111	paul	blanchette	35 Intervale Ave		Dracut	MA	01826	9789307397	1	Stop controlling our waters.	usdsvp@juno.com	1	2005-09-29 08:05:20	2005-09-29 07:28:55	8dc2e17f6d049d0f577cc653650dc1	63.71.19.253
111	112	Mark	Hendry	800 Camelia St		Atlantic Beach	FL	32233		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	markhendry@comcast.net	1	2005-09-29 07:55:35	2005-09-29 07:55:01	f6947c4912005da95cd0f6014e4e59a2	66.177.166.83
112	113	Preston	Hobbie	2714 Sheffield Dr.		Indianapolis	IN	46229	317-894-9338	1	please revisit the Action Plan to allow SCUBA divers access like they have had before	hphobbie@ameritech.net	1	2005-09-29 08:04:49	2005-09-29 08:03:22	286f9013a259236074951418e4ee19ba	68.251.188.2
113	114	Robert	Jude	202 college st		Battleground	MA	47920		1	the government has enough to worry about, think how this will go if some bureaucratic moron gets assigned to run this program, like most of the other government run programs.	robjude@kellcon.com	1	2005-09-29 08:15:57	2005-09-29 08:15:15	2e606502a3a17c141bacbb83e634555b	12.221.144.103
114	115	Catherine	Snow	8 Pine Knoll Drive		Southwick	MA	01077	413-569-5822	1	As a full time worker and mother, I have limited time to obtain permission for something that should be available to me at any time. I enjoy being able to visit new sites, including shipwrecks, which tend to have a significant number of marine species available to observe in one spot.	csnowconsultant@gmail.com	1	2005-09-30 11:44:16	2005-09-29 08:59:29	615d615ad45247b7f8f3215402bbf508	216.19.230.202
115	116	JAY	STERLING	PO BOX 794		SANBORNVILLE	NH	03872	603-473-8255	1	KEEP WRECK DIVING OPEN TO THE PUBLIC	STERLINGJP@MAIL.PORTS.NAVY.MIL	0	0000-00-00 00:00:00	2005-09-29 09:03:40	752fe4ae80aff1c946a590958a42915	199.208.157.35

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
116	117	richard	green	1621 wimmenauer drive		indianapolis	IN	46203	3174140787	1	I am a small business owner for many years, and I understand how some people can bully other people just so they get to do it their way. but this is not always the best for everyone as a whole. my motto is Teamwork,there is no self-made men,you will reach your goals with the help of others.	rickg@thepeanutking.com	1	2005-09-29 09:17:14	2005-09-29 09:08:36	adf71cfd6df9577316d4f531a6aee8d	69.210.1.198
117	118	william	millin	28 franklin st		easthampton	MA	01027		1	.	mils2252@yahoo.com	1	2005-09-29 09:48:55	2005-09-29 09:48:18	e4085e6f164e92b4ee794d7b1d46cb13	24.151.140.169
118	119	Matthew	Ferrell	12835 Bridgett Dr. N		Camby	IN	46113	317-834-2395	1	I do not agree with the Maritime Heritage Resources Action Plan.	ferrellm@purdue.edu	1	2005-09-29 10:19:43	2005-09-29 10:18:48	c53f7bb73a33b11efa658cca11f166bd	128.210.52.137
119	120	Jo	Coleman	3144 N Norfolk St		Indianapolis	IN	46224		1	Requiring advance notification of dives is an unnecessary bureaucratic demand.	joicoleman@sbcglobal.net	1	2005-09-29 11:08:54	2005-09-29 10:21:09	d8623f038fe6b7ce30df93df5e886374	68.253.58.160
120	121	Martin	Schutzbank	210 N Kentucky ave.		Massapequa	MA	11758	5166209044	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Martin Schutzbank	martyx9x@msn.com	0	0000-00-00 00:00:00	2005-09-29 10:34:19	b9493d7461e9d7878af470752e572365	68.194.34.246
121	122	Barbara	Knowles	50 Cornell Road		Marblehead	MA	01945	7816316428	0	Newly discovered shipwreck sites should be studied; however, without a time limit on the assessment period of newly discovered shipwreck sites, a site can be withheld from the public indefinitely. This is unfair and unnecessary. Newly discovered shipwreck sites must be inventoried in a timely manner and subsequently shared with the public, which means facilitating access.	amarellis@aol.com	1	2005-09-29 18:48:42	2005-09-29 10:34:54	dfc5f5ee5c3b00ff15e8370ca786d4	64.12.116.12
122	123	Christopher	Ekberg	29 Wellesley Ave Apt D		Natick	MA	01760	(508) 545-1104	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	cekberg.dive@bluetulip.net	1	2005-09-29 11:53:10	2005-09-29 10:38:04	cc14d99ca25d7a1404026856a78957ed	209.202.205.1
123	124	David	Stoebe	1489 Rt 136		Washington	PA	15301	724 229-8989	1	There should be absolutely no restrictions to access to Stellwagen Bank.	david.stoebe@papitt.ang.af.mil	1	2005-09-29 11:18:01	2005-09-29 11:17:11	f0314d02334d3b26918fc732a6d6e203	137.14.10.22
124	125	Mary	Curran	P.O. Box 143		Hamilton	MA	01936	978-468-7926	0	I am a spouse and mother of certified divers as well as a supporter of commercial fisherman...Access should not be limited	mamcurran@comcast.net	1	2005-09-29 11:27:45	2005-09-29 11:22:32	340bfd0f0306a45fb97fb79970ae7d	24.34.162.213
125	126	Thomas	Piper	39 Barnes st		Leominster	MA	01453	978-534-6332	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank."	tpiper@esmi.us	1	2005-09-29 12:33:58	2005-09-29 12:21:31	fc199cf665ecb399dc06b05a8bc4b6c9	24.63.196.128
126	127	Julian	Race	5 Bonneau Ct		South Dartmouth	MA	02748		1		jrface@wpi.edu	1	2005-09-29 12:43:09	2005-09-29 12:41:41	081cbe910f6dc85970f80725644c3322	24.151.134.61
127	128	Nilufer	Usta	206 Weatherstone Dr		Worcester	MA	01604	5083632521	1	As I diver and a biologist, I respect and protect the nature. I do not understand why NOAA (which used to be known as diver friendly organization) would try to restrict our access to this National Marine Sanctuary. I have to admit that I am extremely disappointed in NOAA's efforts to change the existing management plan.	nilusta@hotmail.com	1	2005-09-29 13:35:13	2005-09-29 13:34:53	b8d788da4e8c8ed9c5e629305e474e37	216.195.18.253
128	129	Sarah	Artz	6716 Chillems Dr		Spring Grove	IL	60081		0	Access to these historical wrecks should be available to the public unless there are safety or preservation concerns that are explicitly stated.	bluezebragirl@hotmail.com	1	2005-09-29 14:12:44	2005-09-29 14:12:12	c24f87e2360e2d06ed1310eb680513b3	130.215.233.71
129	130	Ken	Goguen	9 Maynard Road		Berlin	MA	01503		1	I also disagree with NOAA's proposed changes for the management of Stellwagen Bank!	kengog@charter.net	1	2005-09-29 14:22:08	2005-09-29 14:20:50	1972f8c5ef223821588f88d6fa183f61	168.159.190.36
130	131	Marc	Courchesne	134 Fisherdick Rd.		Ware	MA	01082	413-967-7519	1	Please keep these areas open I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	mr1retired98@yahoo.com	1	2005-09-29 14:32:50	2005-09-29 14:31:57	fa34b247a49df6e82cbd617462bda7f8	24.60.124.170
131	132	PAUL	MITCHELL	16 LINSCOTT ROAD		HINGHAM	MA	02043	781-337-7400	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	pfm111@comcast.net	1	2005-09-29 14:40:11	2005-09-29 14:33:23	f8fb57067c7d17f840f6e965d017d2a	209.113.210.114
132	133	Olivia	Free	130 Lake Shore Ave		Hamilton	MA	01982		1	1) Of paramount importance is the fact that the SBNMS is so short-staffed (I believe their MMH staff numbers 3) that wrecks being evaluated "on a case-by-case basis" during the Discovery and Restricted Access phases could potentially remain on those lists for years awaiting assessment. There is also a lack of prioritization criteria by which the wrecks would be selected for evaluation. 2) There has been no definition of the scientific criteria that will be used to determine the size of the avoidance area around wrecks. 3) It is arrogant to believe that commercial fishermen actually need to be informed about the locations of hangs in areas they have been fishing collectively for more than 400 years.	olivrugeo@hotmail.com	1	2005-09-29 14:51:05	2005-09-29 14:47:39	1dcad0523674380ba46a42479260eb60	141.154.123.45

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
133	134	JAMES	HARRIS	10 HOBSON ST		DANBURY	CT	06810	2037443991	1	PLEASE ALLOW US TO CONTINUE OUR ACCESS TO THE WRECKS. AS A SCUBA INSTRUCTOR I TRAIN ALL STUDENT TO BE ENVIRONMENTALLY AWARE AND TO RESPECT OUR NATURAL RESOURCES. ALSO AS A MEMBER OF REEF. WE DO ANNUAL STUDIES OF LOCAL MARINE LIFE. ENOUGH GOVERNMENTAL INTRUSIONS ON OUR RECREATION. I disagree with NOAA's proposed changes for the management of Stellwagen Bank. THANK YOU	SCUBAPUK@AOL.COM	1	2005-09-29 16:32:00	2005-09-29 14:47:54	157ab33a7a184cee0f0350960de65bd4	65.160.239.30
134	135	Damon	Gray	49 Center Rd		Shirley	MA	01464		1	I agree with the position/s described here: <a href="http://www.shipwreckdivers.org/response.shtml">http://www.shipwreckdivers.org/response.shtml</a> And feel that NOAA's proposed changes for the management of Stellwagen Bank are not in the best interests of the people of the Commonwealth of Massachusetts.	damon_gray@gillette.com	1	2005-09-29 15:04:09	2005-09-29 14:54:01	be237ed87e6b6e9a8c6d04138bd2b878	204.110.99.42
135	136	Renee	Lange	105 Challenger Rd		Ridgefield Park	NJ	07660	201-229-5780	1	"I disagree with NOAA's proposed changes for the management of Stellwagen Bank."	reneel@sea.samsung.com	1	2005-09-29 15:23:39	2005-09-29 15:20:37	dd2f570b3e265ef0e702121dd02ffe2d	63.124.79.254
136	137	Laraine	Zappala	14 Martin Ave		Salem	NH	03079	978-292-5533	1	I do NOT agree with NOAA's plans for management of Stellwagen Banks.	laraine.zappala@polycom.com	1	2005-09-29 15:36:06	2005-09-29 15:33:25	a400585392d6366b90c6b71431888e5	140.242.250.10
137	138	Leo	Nicolera	161 Arrowwood Place		Ballston Spa	NY	12020	518-877-6600	1	I strongly disagree with NOAA's proposed changes for the management of Stellwagen Bank. There should be NO limitations imposed on diving activities.	lm2dive@hotmail.com	1	2005-09-29 15:46:44	2005-09-29 15:45:39	838de3e1e8ff1f565568ecbd13358c72	72.43.7.51
138	139	Peter	Spinney	73 Burnside St.		Lowell	MA	01851	978-458-8387	1	It makes no sense to bar the public from sites that have no compelling archeological significance.	peter.spinney@analog.com	1	2005-09-29 15:46:54	2005-09-29 15:45:57	d35492bde43923b1ed3e3d8c24154071	137.71.23.54
139	140	Alvin	Golden	195-46 Keno Ave.		Holliswood	NY	11423	(718) 464-3322	1	As a scuba diver, it is natural that I would want the ability to visit and witness "underseas history". The proposed regulations, however, will stifle and undermine shipwreck exploration, to the detriment of not only the scuba diving public, but to the entire general population. These regulations inhibit further underwater exploration, and prevents responsible scuba divers from providing ongoing historical research and information for the betterment and benefit of the public at large.	algolden3@juno.com	1	2005-09-29 15:58:06	2005-09-29 15:57:01	b7b092ad405cc2ad33c3812ed0701a6	68.161.198.120
140	141	Michael	Drumstas	68 Aspen Ave		S Grafton	MA	01560		1	I disagree with NOAA's proposal relating to Stellwagen bank	griswald8@aol.com	1	2005-09-30 16:01:20	2005-09-29 16:21:01	4817fa396c0821e8f442ced6474e49b	68.116.166.11
141	142	Stephen	Scheuer	261 Charlotte White Rd.		Westport	MA	02790-4331	508-636-3033	1	I do not agree with NOAA's proposed changes for the management of Stellwagen Bank. scheuer	stephen.scheuer@gmail.com	0	0000-00-00 00:00:00	2005-09-29 16:30:30	8e1f73a0711191cfbac388b71be8691	68.191.79.146
142	143	Chris	Grace	4817 Ensign Ave N		New Hope	MN	55428	763-537-6229	1	New England Diver Former MA Resident	cgrace12@yahoo.com	1	2005-09-29 17:22:47	2005-09-29 17:14:47	b5d094173a47790c8346f6c08959273	151.190.254.106
143	144	John	Grzybowski	1499 Mahaffy Road		Fort Edward	NY	12828	(518) 838-8093	1	These shipwrecks in question will eventually become unrecognizable piles of rubble due to the effects of nature. Scuba divers would have very little if any effect on their own, in fact they may preserve some of the artifacts that would be destroyed if allowed to.	depthcharge@direcway.com	1	2005-09-29 17:43:09	2005-09-29 17:41:04	91b55526e2ba2a3464199695ee1d29bb	64.80.241.92
144	145	Jason	Thibodeau	PO Box 10013		Concord	NH	03301	6032246876	1	Scuba divers, as a group, are one of the most environmentally concerned people in our country. Every diver goes into the ocean to admire it's beauty. Restricting access to people who care for the sights does not make sense. They serve as a protection to sensitive areas by being respectful of the sight and educating others about it. Divers are at the forefront of that education.	djnprofessional@netscape.net	1	2005-09-29 17:46:40	2005-09-29 17:44:02	a2907dcd63279b1d3d5e854d5b27ad9	64.222.151.149
145	146	MARK	DEXTER	3 VALERIE LANE		DANBURY	CT	06811	(203)743-6893	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	mark.dexter@sbcglobal.net	1	2005-09-29 18:03:17	2005-09-29 18:02:10	70927805bd3e96d17e9b420649c6b1ef	64.252.138.113
146	147	Paul	Gilberti	4 Nowell Court		Salem	MA	03079	603-893-3370	0		paul@pgis.net	1	2005-09-29 18:05:29	2005-09-29 18:05:29	3f0e04be6f004f5037fe33408b244c81	4.36.56.132
147	148	Barry	Campbell	726 Blossom Street		Fitchburg	MA	01420	978-345-7106	1	Once again the government is trying to take public lands away from the public in the name of conservation.	scubabear6@msn.com	1	2005-09-29 20:00:19	2005-09-29 19:59:47	e3233e901165e92ee99d7bd5d402140	141.154.212.80
148	149	Valerie	Feehan	27 Great Woods Terrace		Lynn	MA	01904	781/595-1679	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	john_val27@yahoo.com	1	2005-10-01 07:04:51	2005-09-29 20:22:47	7ee73f8b1cf0cd2de8cb91d2c4b68438	151.203.244.195
149	150	Richard	Shepardson	19 Parkwood Street		Springfield	MA	01108	413-315-7574	1	Someday I would like to take my kids to some the great dive sites this state has, and I hope this will be one of them... Please keep them open for people like us. Everyone should be able to enjoy them.	phase392@yahoo.com	1	2005-09-29 20:44:01	2005-09-29 20:43:18	ed5fac3a0bb05b6ff0fe324b2653537c	70.109.226.162

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
150	151	Tim	dWYER	256 aRCH rD		AVON	CT	06001		1	This is a great resource enjoyed by all. Given the location diving cannot possible destroy this environment. Visiting wrecks and diving this area is a mean of passing history / stories and experiences to those who are not capable of visiting this area.	1BEOGRAD1@COMCAST.NET	0	0000-00-00 00:00:00	2005-09-29 20:54:43	b6d1392999e1c7e6de4911eb9a967db2	67.172.9.176
151	152	Brian	West	7760 N. College Ave.		Indianapolis	IN	46240		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	brian_west@hotmail.com	1	2005-09-29 23:04:24	2005-09-29 23:04:08	6ad3250b6359b4a7e6ee3214771f71d4	68.58.5.105
152	153	Albert	Grove	514 N. Dequincy St.		Indianapolis	IN	46201	317-356-7098	1	I very much disagree with NOAA's proposed changes for the management of Stellwagen Bank.	www.grove_heating@msn.com	0	0000-00-00 00:00:00	2005-09-29 23:36:11	9cb78e461d9f6a348c4f8142276eeef	68.249.103.163
153	154	Charles	Cain	1221 Poplar Ridge Road		White House	MA	37201		0	As a SCUBA diver and someone interested in the historical aspects of shipwrecks, we need to ensure that future divers and historians can have access to these shipwrecks	randy@scubarandy.com	1	2005-09-30 00:32:52	2005-09-30 00:31:22	841249652a2357d711b82dcb05e0e45	70.149.159.204
154	155	Gary	Richard	8 Thayer Pond Dr.	#8	North Oxford	MA	01537	5089871690	1	I am totally against any restricted access for divers, believing that protection and preservation is not best achieved by closing an area off. Specifically, I consider divers to be non-invasive to the ecosystem.	divgary217@att.net	1	2005-09-30 07:25:48	2005-09-30 07:24:46	cc842d3e0578f549a1ef9c679e45996d	209.247.222.84
155	156	Scott	Neff	16 Conklin Road		Stafford Springs	CT	06076		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	scott22@ci.manchester.ct.us	1	2005-09-30 07:43:12	2005-09-30 07:40:42	2608b1678863702f4537d8d9ae33158c	204.60.182.125
156	157	Mark	Matley	100 Glenwood Drive		Leominster	MA	01453	978-502-5723	0	Please do not allow access to be restricted to Stellwagen banks.	cmmatley5@comcast.net	1	2005-09-30 07:55:24	2005-09-30 07:46:05	11b1b3632f4f3d16c540e8f7357b13d1	67.189.199.123
157	158	MArk	Corriveau	46 Bushnell Road		Sturbridge	MA	01566		1	This will impact the tourism industry on Cape Cod. There is not much else for divers to see but this area from the Cape.	usermsc@aol.com	1	2005-09-30 08:09:07	2005-09-30 08:07:10	505ea45f521c1fb3d29373d512503bd	207.190.242.114
158	159	Kevin	Magee	4363 W. 182nd Street		Cleveland	OH	44135	216-941-2998	1	I am strongly against any restrictions on diving or recreational access in general to the Sanctuary. This includes the imposing of user fees or requiring registration of divers to dive within the Sanctuary limits. This goes strongly against the purpose of having public lands/waters and will only hurt support for future conservation efforts of our waters.	kevin.magee@zin-tech.com	1	2005-09-30 08:22:09	2005-09-30 08:16:14	c6466b2b0a2552145cdccde16da8e8f	128.156.10.80
159	160	Mark	Nix	303 Wellspring Ct		Hockessin	DE	19707	302 235 0963	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	mark_nix@msn.com	1	2005-09-30 08:27:46	2005-09-30 08:27:34	b03d860f82cc75c9e8dc2304e0c0eb01	169.145.3.11
160	161	Gregory	Leiby	206 Water Mill Road		Greer	MA	29650	864.848.1151	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	gleiby@yahoo.com	1	2005-09-30 08:44:11	2005-09-30 08:33:57	d6fa1721895872620761d0950cab4289	204.0.197.190
161	162	Mark	Naile	9 Falls Grove Road		Nashua	NH	03063	970-595-7106	1	I agree that the marine sanctuary needs to be preserved but also think that recreational diving does not pose a threat to the longevity of the area as long as no souvenirs are taken and boat anchoring is done in a way that will not harm the seabed or artifacts.	mark_naile@msn.com	1	2005-09-30 08:36:09	2005-09-30 08:35:52	b3f8636394cf87126de4bc097243af2	208.253.58.133
162	163	Lesley	Jacques Pittaro	12324 SW 94th Terrace		Miami	FL	33186	305-338-4397	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	runawaylobster@yahoo.com	1	2005-09-30 08:42:46	2005-09-30 08:41:45	7ed4e1152ee7f09d3b3d939c0eed34dc	52.128.30.23
163	164	Jason	Swenson	4806 Mill Park Court		Glen Allen	MA	23060		0	Thanks for your efforts on this petition.	jason.swenson@suntrust.com	0	0000-00-00 00:00:00	2005-09-30 08:48:24	a9f59b230fd10aa0c19cbe08c92ea55	167.181.12.201
164	165	James	Canty	1101 Juniper St NE #1226		Atlanta	GA	30309	954-298-1747	1	NOAA's proposed changes for the management of Stellwagen Bank are contrary to the public good.	kelliamus@yahoo.com	1	2005-09-30 09:42:15	2005-09-30 09:34:21	fa15ed492e5b79948944c740f56fc64c	66.56.8.115
165	166	Greg	Jackson	32 Highland St.		Dunstable	MA	01827	978-842-4040	1	I oppose the management changes proposed by the NOAA with regard to the Stellwagen Bank National Marine Sanctuary. As a U.S. citizen I demand that this resource remain available to me for access.	greg@gregjackson.ws	1	2005-09-30 09:58:21	2005-09-30 09:49:11	4759aa4fd69b9442cd7a7ee1495cd77	68.114.92.52
166	167	Brian J	Perry	22 Stephen Drive		Webster	MA	01570	508-640-0414	1	I am a shipwreck diver. I take pictures and leave buoys. I am not a threat to the environment. The Federal Government has no cause to restrict my entry into the sea to conduct a peaceful and harmless recreational activity in marine sancuary areas like Stellwagen Bank. Nor does it need to control, monitor, or supervise my diving activity. Please strike all references to diving or underwater exploration of shipwrecks from your proposal.	bperry@web5.com	1	2005-09-30 09:55:26	2005-09-30 09:51:27	eba148e0481a01ebd95b9f58f571099	64.65.242.62
167	168	Michelle	Marengo	113 Brigham Street	Unit 1C	Hudson	MA	01749		1	I don't agree with NOAA's proposed changes for the management of Stellwagen Bank - we should be able to visit this landmark!	michelle.marengo@fmr.com	0	0000-00-00 00:00:00	2005-09-30 12:14:17	66e28ac028ea78aa73d8ac0b875109ac	192.223.226.5
168	169	George	Gilligan	10 Rey st		N. Grafton	MA	01536		0	The need to close this area to divers is un-necessary. We have shown in the past we are responsible without intervention from government agencies.	jgggerg@netzero.net	1	2005-09-30 12:37:23	2005-09-30 12:33:46	1874c0e602b64024f1e26c195409654d	66.100.4.162

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
169	170	Randy	Mongeau	134 Creamery Brook Road		Brooklyn	CT	06234	860-234-7475	1	We need to keep our oceans open for all to use. Instead of putting all these resources to close down these sites, we should be looking at ways to preserve our environment.	yakone@hotmail.com	1	2005-09-30 13:20:05	2005-09-30 12:47:32	bb7e75f3625d80cf388ba004789d6aa	66.168.46.234
170	171	robert	casson	2602 alvey drive		haymarket	VA	20169	7037635840	1	DOnt allow NOAA to do this.	racasson@yahoo.com	1	2005-09-30 13:05:26	2005-09-30 13:04:58	595911f64e1093aedcfc3d3ae4dcb4	63.136.118.243
171	172	Philip	Dubey	1764-B Middlesex St.		Lowell	MA	01851-1108		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	linmanphil@yahoo.com	1	2005-09-30 13:17:25	2005-09-30 13:16:34	5c2b24a52e3d13a489dc3004bd18caac	56.0.103.25
172	173	Carole	Laverdiere	p.o. box 98		putnam	MA	06260		1	please list my name on the petition, thank you.	loracnov@aol.com	0	0000-00-00 00:00:00	2005-09-30 13:34:56	87b52ddc70f1f3b47c7ad0cb2e5100f7	64.252.193.147
173	174	michael	oconnell	6 hillside ave		southborough	MA	01772		1	I disagree with the NOAA's pending petition for changes for the management of Stellwagen Bank." as a certified "open water advanced" diver this will greatly limit myself and others appreciating the sport and the historcial sites in the great state we live in. The Federal Abandoned Shipwrecks Act of 1987 requires that states facilitate access to shipwrecks. Recreational divers like myself do not destroy, damage or pillage the environment we greatly appreciate.	memoconnell@verizon.net	1	2005-09-30 14:39:43	2005-09-30 14:38:06	1cd2659a8c6a492600f613a238c84676	68.239.5.215
174	175	Alex	Vasauskas	P.O. Box 3195		Palmer	AK	99645		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. In particular, restricting access by scuba divers to shipwrecks is a misguided attempt to preserve something that ultimately cannot be preserved and akin to attempting to preserve wrecked cars along our highways.	surlyc@alaska.net	1	2005-09-30 14:53:48	2005-09-30 14:52:12	24648b5efc9cc9fce92f7304e97dc12c	209.193.43.76
175	176	John	Daley	14 Park Street		Sullivan	ME	04664	(207) 422-6571	1	I am all for history but not at the cost of freedom. Sport Diving in the Stellwagen Bank preserve should be allowed.	tauntobay@hotmail.com	0	0000-00-00 00:00:00	2005-09-30 15:01:19	ea4315b4c53a5b51bfa980913087e24	169.244.70.148
176	177	Martin	Ruse	4 Starknaught Rd		Gloucester	MA	01930		0	I think this is yet another scheme designed to restrict the freedom and liberty of American citizens.	martin.ruse@it.com	0	0000-00-00 00:00:00	2005-09-30 15:37:08	95f81172a666fe344de748282e7b060	192.121.45.2
177	178	Joseph W.	Augusto	96 pineland ave		worcester	MA	01604	5087985844	1	I disagree w/ NOAA's proposal on Stellwagen Bank. The proposed AP for Stellwagen Bank has serious flaws in the area dealing with diving access. As a member of the Maritime Archaeological Surver Team, Inc., I am well aware of the need to protect underwater cultural resources. At the same time, I know how much positive work is performed by lay people and the public. Government funding is not unlimited but, the enthusiasm of included people can be nearly unlimited. A more cooperative set of rules, like those of Thunder Bay NMS, should be used to revise the current AP. Regards, Ken Marshall	augspkter@msn.com	1	2005-09-30 16:07:18	2005-09-30 16:04:15	55f005a08a26d8d6d3760b5e1b8932b5	24.107.233.141
178	179	Kenneth	Marshall	1203 E 344th street		Eastlake	OH	44095	440-942-6670	1	WE have been losing to many of our rights for special interest groups that want to close wild life areas with out understanding all the facts. Divers do more good to any area then harm so it could stay a free place for all ot enjoy.	ksmarshall@core.com	1	2005-10-01 10:20:26	2005-09-30 17:05:00	2c8a3ad7d81e324e1e4e9e024cd38d68	208.178.188.18
179	180	Harold	Dutton	2 kennedy lane #25		milford	MA	01757	508-435-1000	1		harolddutton@comcast.net	1	2005-09-30 18:08:32	2005-09-30 18:07:26	279a4b01570de8f5a93883989f299c07	24.218.42.84
180	181	Marvin	Gozum	833 Chestnut St #701		Philadelphia	PA	19107		1	Policies governing diving on wrecks must include input from members of the diving community and should not restrict access to such wrecks.	gozum@computer.org	1	2005-09-30 18:44:20	2005-09-30 18:21:11	ccf5d59adc0b2de4299f889c173f5cca	70.110.210.253
181	182	Laura	FranzeseOrtmann	40 Alton Road		Babylon	NY	11702	6316614452	1	I disagree with the proposed plan to limit access by divers, fisherman and others to the Stellwagen area and other marine sanctuaries. Further, excessive governmental interference is not a valid use of my tax dollars.	lortmann@optonline.net	1	2005-09-30 18:29:52	2005-09-30 18:24:53	74611d8573012f131389bb6c736997178	24.187.224.214
182	183	David	Hinkle	4609 Cardington Court		Virginia Beach	VA	23466	757 471-2269	1	The oceans and all waterways should be freely open to everyone. There should not be any restrictions for any activities whether its fishing or diving.	David.Hinkle@aig.com	0	0000-00-00 00:00:00	2005-09-30 20:50:24	7d28cad030379ba042c09d442bd45ae8	70.160.212.104
183	184	Marlow	Patrick	1629 Winterberry Lane		Weston	FL	33327		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank or any other submerged areas of historic interest that would limit my access to these historic wreck sites. Thank you for your consideration of my viewpoint.	patrib@yahoo.com	1	2006-01-11 16:31:58	2005-10-01 00:45:24	82dc0f710ee4109cc17fac743dc86c6	65.8.109.132
184	185	Tom	Hundley	212 NW Streamside CT		Lake City FL	FL	32055	386-754-8480	1	I disagree with limiting access of public lands and sea. I would like for you to reconsider you actions.	Tomeauburn@aol.com	1	2005-10-01 01:18:56	2005-10-01 01:18:10	7f9b99026d3d95a9ab020f914c9dc9ff	205.188.116.8
185	186	John	Feehan	27 Great Woods Terrace		Lynn	MA	01904	781-595-1679	1	I completely disagree with NOAA's proposed changes for the management of Stellwagen Bank. It's too restrictive for all concerned.	jvfehan@verizon.net	1	2005-10-01 07:13:35	2005-10-01 07:03:53	ed8fd08e355eb07c85fa0b55dfdf54f0	141.154.241.137

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
186	187	James	Meehan	289 Mossman Road		Sudbury	MA	01776	978-443-8690	0	These wrecks belong to us all, not just to some elite group of researchers nor to the government gatekeepers. The wrecks should be open for all to enjoy.	jamesmeehan@comcast.net	1	2005-10-01 08:30:04	2005-10-01 08:29:35	1b7fa2db1b9217b4b26fe76a6812bd99	24.91.223.1
187	188	Frank	Hartig	4 Beech Street		Norwood	MA	02062	781-762-1888	1	I strenuously disagree with NOAA's proposed changes for the management of Stellwagen Bank. This proposed policy unnecessarily infringes on the rights of the public in the oceans and would effectively result in a complete ban on recreational wreck diving in this and other marine sanctuaries. Trained, certified recreational divers cause virtually no damage to sensitive marine areas and should not be singled out and discriminated by this oppressive legislation.	frank.hartig@verizon.net	1	2005-10-01 10:34:10	2005-10-01 10:33:20	1186ba2b33df6921c34a3cd15d5836c6	71.243.79.84
188	189	John	Sullivan	3 Broadway		West Babylon	NY	11704		1	I hope that reason prevails and that a reasonable compromise is reached soon. As a diver, I can appreciate the need to keep these sites intact for all to see and to keep preserved as long as possible - but we should still be able to visit them, take pictures and learn from our history. Quoting from the National Forest Association: "...take nothing but pictures, leave nothing but footprints..." Thanks for listening! -John-	x11717@yahoo.com	1	2005-10-01 10:44:27	2005-10-01 10:43:42	130608b4833607deade0720619ba1a0	68.195.144.22
189	190	Lisa	Dular	4300 McKinney		Willoughby	OH	44094		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	ldular@email.com	1	2005-10-01 11:09:11	2005-10-01 11:05:43	c69c070034aa4983beb31609d6187b98	12.75.67.135
190	191	Blaise	Gassend	474 Cambridge St		Cambridge	MA	02141		1	I'm just getting started wreck diving. I would hate to see all these great diving opportunities go off limits.	blaise.gassend_shipwreckdivers@m4x.org	1	2005-10-01 11:14:31	2005-10-01 11:13:36	4231780e2db591544b2b430938aac6f1	70.19.171.147
191	192	Dallas	Edmiston	99 Patton Avenue		Williamsville	NY	14221	716-725-5333	1	Divers have every right to dive these sites without government restriction and monitoring.	dtek@adelphia.net	1	2005-10-01 12:36:19	2005-10-01 12:35:51	322ea5216994ecc81535e2dafbf54a05	67.20.229.185
192	193	Tony	Pender	350 Old Wood Dr		columbia	SC	29212		0	I agree on the response on these issue's	tpender@sc.rr.com	0	0000-00-00 00:00:00	2005-10-01 23:13:42	8922b998defa8c572a9be580520c740	65.188.31.20
193	194	David	Nance	1736 Yorktown Drive		Norfolk	VA	23505		1	Please reconsider this restriction to wreck diving	dnance@hamptonroads.com	1	2005-10-02 12:51:47	2005-10-02 12:51:25	9a728423448c11f9f75fe96f165dad9c	68.229.114.69
194	195	Scott	Tomlinson	15 Hunters Run Place		Haverhill	MA	01832		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	scott.tomlinson@verizon.net	1	2005-10-02 16:41:04	2005-10-02 16:37:59	385dcb5e9aefa23894279dee90c66d6e	151.203.50.195
195	196	Julie	McGowan	4713 Stoughton Ct		Indianapolis	IN	46254		1	As an eco-dive instructor, I am very aware of the contributions that are made to maritime historic preservation by recreational scuba divers. I am quite concerned that restrictive mandates in our maritime preserves might inhibit this sport and the concomitant support by this critical group.	jmcmcgowa@iupui.edu	0	0000-00-00 00:00:00	2005-10-02 19:04:50	95de9a3f29b88b5174bef7de48e0ed65	149.166.135.32
196	197	James	Greene	249 Marrett Rd		Lexington	MA	02421	781 860-0699	1	There is no data to my knowledge to support restrictions or outright banning of divers from those proposed waters. Divers are the harbingers of water protection. To ban us would put those resources at risk!	marrett1@rcn.com	0	0000-00-00 00:00:00	2005-10-02 22:14:08	fe7229a39870aea57d5e5a0916213cc	204.167.92.26
197	198	Steven	Bolster	133 Carter Court, SW		Vienna	VA	22180	703-499-2808	1	Scuba Diver are the least intrusive of Marine activities!!!	deepbluevideo@yahoo.com	1	2005-10-03 08:48:21	2005-10-03 08:42:39	1873b7e171dd10270b22866a4fa2b6f8	67.111.253.158
198	199	Jenny	Wu	216 Summer Street #2		Somerville	MA	02143		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	diverjwu@yahoo.com	1	2005-10-03 08:56:53	2005-10-03 08:47:44	i0066fc55b272c5c1315ca0ba37ace5	12.105.75.17
199	200	Daniel	Bruso	11 Mallard Circle		Somers	CT	06071	860-286-2929	1	The suggestion that a huge tract of ocean embodying portions of our maritime heritage should be closed off by the Federal Government is wholly and utterly without merit. We dive to explore and experience maritime history. For the Federal Government to deny access based upon unsupported conjecture regarding damage to shipwrecks is inappropriate and should not be tolerated.	DBruso@cantorcolburn.com	1	2005-10-03 09:43:04	2005-10-03 09:42:34	9b7c26a484fac5c0a627cc771a015ad3	12.178.89.104
200	201	Timothy	Doly	1119 Frost Rd		Endicott	NY	13760		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	timothydoly@hotmail.com	1	2005-10-03 09:55:41	2005-10-03 09:55:12	d9b768bedaf90852f5d5ba5405dc9f1	66.162.72.105
201	202	Jeffrey	Downing	P.O. Box 119	7 Dowd Lane	Sunapee	MA	03782	603-454-7190	1	Allow divers to visit shipwrecks	diverjmd@hotmail.com	1	2005-10-03 13:50:02	2005-10-03 10:22:00	84d3a922f1daa0c52c69c6dd0f1dcd1e	64.223.151.158
202	203	Joseph	Tunkel	38 Summersweet Drive		Middle Island	MA	11953		0	Save the sanctuaries!	Justcruzen@verizon.net	1	2005-10-04 20:46:15	2005-10-03 11:09:28	d4ce18092a15c8078d516a56fe560c6a	69.27.230.202
203	204	Mark	Lombardo	67 Ridge Rd		Concord	NH	03301		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	MLom1@aol.com	1	2005-10-03 11:16:09	2005-10-03 11:13:53	8ed51c7e6c10f1dbdd846f0f0580836c	198.212.228.1
204	205	Samuel	Niles Peretz	5 Grace Path		Acton	MA	01720		1	I firmly disagree with NOAA's proposed changes for the management of Stellwagen Bank. These changes are unwarranted and unfair.	srnp@comcast.net	1	2005-10-03 21:12:11	2005-10-03 21:11:45	ef8365ce10c4a046d5b32d32508c0783	66.92.85.82
205	206	Brian	Holmes	86 Steven Rd		Marshfield	MA	02050	3392193027	1	I vote every election	lcthoo3@adelphia.net	1	2005-10-03 21:59:58	2005-10-03 21:37:28	04aeeda66b728014a68d84a0ffafb8dd	69.168.88.73
206	207	Michael	Sanderson	79 helmstad		Detroit	MA	14377		1	None at this time	msanderson@msn.com	0	0000-00-00 00:00:00	2005-10-03 21:50:39	b6ba6c105120176a45650ae2ffc4b65	70.27.66.145

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
207	208	Rafael	Figueroa	11782 SW 99 Lane		Miami	FL	33186		0	1)I oppose the classification system. 2)Mooring systems like in the Florida Keys NMS should be employed.	rf_scuba@hotmail.com	1	2005-10-03 22:40:59	2005-10-03 22:39:47	d06063ea4192fe4c54c959c24990259	67.101.125.179
208	209	David	Daly	520 Ferry Street		Marshfield	MA	02050	9784709767	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. This is a public resource that should remain accessible to the public without retractive and unnecessary permitting.	ipdaly2525@yahoo.com	1	2005-10-04 10:01:21	2005-10-04 09:56:40	e01128d9c1bf0b16fb423989cd20180a	199.46.198.231
209	210	david	schreck	75 salem court		hinckley	OH	44233-9620	330-225-7389	1	I disagree with NOAA's proposed changes for the management of Stellwagen bank.	schreckdi@chemstress.com	0	0000-00-00 00:00:00	2005-10-04 13:12:02	c5954fe7be6daa63922128b380f5c142	66.218.139.34
210	211	Joe	Cushing	6 Hillside Drive		Strafford	NH	03884	603-664-7666	1	Another way of trying to control what we can and cannot do. NOAA or anyone else should not have control over access to any Undersea sites. The sites should be left to be viewed by all that venture below.	jjclc@metrocast.net	0	0000-00-00 00:00:00	2005-10-04 13:35:53	f1f91628c05642263182b33a1245275b	138.162.0.44
211	212	Reed	Coles	27 Ely Road		Monson	MA	01057	4132679995	1	you should close off the red wood forest so you can let the trees go un seen	reedccr2samnel.net	0	0000-00-00 00:00:00	2005-10-04 15:06:07	efdb49f19554dca6c9ba97c9a8cd61e	66.103.2.148
212	213	Eric	Smith	132 Saddlebred Road		Fitchburg	MA	01420	508 207 2688	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	eric.smith@civigenics.com	1	2005-10-04 16:17:43	2005-10-04 16:16:39	2fd2b37cf12df10d72d765f8abf73a3e	65.105.97.67
213	214	Angie	Humbles	3214 Carica Dr.		Indianapolis	IN	46203	317-322-0716	1	I agree with the petition and feel it isn't right to restrict divers from visiting shipwrecks when ever we feel the inclination.	ahumbles@simon.com	1	2005-10-04 16:43:27	2005-10-04 16:17:56	8bb63f47e4f0c7b4de782c8a9615f04c	208.0.121.20
214	215	Michael	Hancock	4629 Delco Road		Virginia Beach	VA	23455		1	The government should have no right to prevent diving on wrecks. These waters belong to all of us and shouldn't be denied to us because of political game playing!!	hancock97@yahoo.com	1	2005-10-07 00:30:01	2005-10-04 16:21:20	f0696ac95b3371aedbeaa678f9acb9d0	65.201.160.68
215	216	Frank	Rutkowski	329 S. Guilford Rd.		Carmel	IN	46032		1	I strongly disagree with NOAA's proposed changes for the management of Stellwagen Bank! Please do not make these changes!!	farutkowski@msn.com	1	2005-10-04 22:37:01	2005-10-04 22:25:11	f339257907ac762dfda3d870eb2d52	4.160.150.33
216	217	Kathleen	Menard	3 North Steele Street		Worcester	MA	01607	508-754-5116	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Although currently not certified to dive wrecks, I want the option to do so in the future!	kjmenardrn@hotmail.com	1	2005-10-05 16:30:06	2005-10-05 16:28:44	99bd686c4c3f4aedbd1bdb0d0f4b74a11	68.116.192.153
217	218	Ed	Krisak	319 Chemung Road		Meredith	NH	03253	603-279-4755	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	krisak@together.net	1	2005-10-05 18:45:08	2005-10-05 18:29:43	814b628c6c329f6fa35e870a1fcd7c4c	207.69.137.23
218	219	Ryan	Kenner	222 William Henry Road		North Scituate	RI	02857		1	Privitize/ commercialize the wrecks/ reefs - this will ensure that someone with a vested interest will properly main and manage them.	rkr@wpi.edu	0	0000-00-00 00:00:00	2005-10-06 12:13:03	72cbb60722112fe83480d89097637cc	198.137.214.20
219	220	Hans	Henning	237 East Main St		Gloucester	MA	01930	978-281-4695	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	hch@henning-eng.com	1	2005-10-06 17:00:58	2005-10-06 16:43:29	4e00c418e1d5e75117d494cd2c3d772	68.239.16.30
220	221	Robert	Chartier	308 Tattlers Trail		Irmo	SC	29063	8037810168	1	Am also asuba instructor. I have seen what careless BOATERS and their trash/even anchors do to caoral and sea beds. Divers learn to avoid damage so as to enjoy the next visit.	RCHARTIER@SC.RR.COM	1	2005-10-07 09:38:38	2005-10-06 20:11:36	b86b48949bb2e3b1aa4ace7f607759db	65.188.14.156
221	222	Rusty	Bachman	5412 W Wernet		Pasco	WA	99301	509-545-4172	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	Rustykfd@clearwire.net	1	2005-10-07 09:54:30	2005-10-07 00:16:23	84f69d8955f01a0a6e4606a6be962b2	207.254.32.163
222	223	Cecil	Stewart	976 Stonewood		Maitland	MA	32751		1	Limiting access and the rights to recover artifacts will reduce the ability to identify the culturally significant shipwrecks found on the bank. These are finit resources, as can be seen by the wreck of the Doria. If these items are not found and preserved they will be lost forever. Please consider allow divers to do this important work. work the government does not have the resources or will to complete on its own Thank you Cecil Stewart	kekke@yahoo.com	0	0000-00-00 00:00:00	2005-10-07 07:28:37	ce200aaa0b34e5b421d8a4407d500d7	70.148.188.212
223	224	Matt	KREISEL	1309 drake crove		mayer	MA	55360		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank."	megdiver12@yahoo.com	0	0000-00-00 00:00:00	2005-10-07 09:17:37	b6652acb8737dc29bb2a191d8013dc1c	70.98.86.149
224	225	David	Dalton	13625 Warrior Brook Terrace		Germantown	MA	20874		0	Thunder Bay National Marine Sanctuary has developed a management plan that serves to both protect and to facilitate responsible access to marine heritage resources. I suggest that plan be utilized here rather than the far more restrictive plan proposed.	dmdalton1@gmail.com	1	2005-10-07 12:39:06	2005-10-07 12:38:48	eda794cb5aa6c1677be114c4378bb09a	65.205.231.250
225	226	Christopher	Wilson	8749 Monica Drive		Miamisburg	OH	45342	937-305-5258	1	I disagree with the NOAA's proposed changes for the management of Stellwagen Bank. The proposed plan isn't a balanced plan for protection and diver's rights to this utilize this important resource.	wilsoncs3980@yahoo.com	1	2005-10-09 17:46:31	2005-10-07 14:49:18	a30bd8550b340569f8ebc3e7fc8545e8	64.56.106.14
226	227	Lori	Takakjian	502 Scouticut Neck Road		Fairhaven	MA	02719	508-990-3802	1	I disagree with the proposed management plan for stelwagion bank national marine sanctuary.	eltak@comcast.net	1	2005-10-08 07:41:52	2005-10-08 07:41:10	e913c1f4651649a35d2783b6484e5cc	24.63.92.185

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
227	228	Eric	Takajian	502 Sconticut Neck Road		Fairhaven	MA	02719	508-789-8901	1	I completely disagree with the proposed management plan for stelwagion bank national marine sanctuary. This plan infringes upon the rights of the public at large in many ways. The whole proposed plan is so seriously flawed it will need to be completely redeveloped.	rvquest@comcast.net	1	2005-10-10 08:13:53	2005-10-08 10:04:37	966886c886be09813155fdb63034126	66.174.76.208
228	229	Seth	Freach	7 Milano Court		Croton	NY	10520		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. I most strongly disagree with the wreck classification system that has been proposed.	sfreach@hotmail.com	1	2005-10-08 10:22:29	2005-10-08 10:20:26	bb4e1175044f785ca0bbe2063a50c744	68.199.19.88
229	230	Russell	Neal	1 Kingswood Dr		North Stonington	CT	06359	860-535-8563	1	I am firmly in favor of continuing to allow Diver access to the wrecks within the sanctuary. I find the Thunder Bay Management plan reasonable. However some provision should be included which allows unrestricted access to shipwrecks with no historical or cultural value.	roneal22@comcast.net	1	2005-10-08 15:15:51	2005-10-08 15:15:26	4f195484dd98ba9efee1d867f309cc8	68.60.212.221
230	231	Adam	Altman	117 Springmeadow Drive		Holbrook	MA	11741	631-285-1739	0	Preserve Divers rights	dixerex@optonline.net	1	2005-10-08 17:16:27	2005-10-08 17:16:12	dccbcc878be6f6865ed38fca2f0ee5d41	24.190.2.43
231	232	Vincent	Bertone	45 West Ave		Ocean View	DE	19970	302-539-2632	0	I disagree with NOAA changes.	vbertone@yahoo.com	1	2005-10-08 21:23:05	2005-10-08 21:16:12	30c6c4970f9f27c4585abb43816814ee	12.226.114.170
232	233	Jeffrey	Goodreau	199 Main st.	apt 2	Rindge	NH	03461	603-899-9811	1	Federal and state tax funded reserves should not be closed to tax paying , and law abiding U.S citizens.	narkt@aol.com	1	2005-10-09 21:41:39	2005-10-08 21:40:26	e4aea241ab09a2aa0e87134193bbea0d	152.163.100.12
233	234	Gary	Gilligan	104 Bay St.		Bridgeport	CT	06607	(203) 335-0709	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	ggilligan@sbcglobal.net	1	2005-10-16 12:09:25	2005-10-09 11:49:55	0e4ae2bcba1f379627c077f5c10a4f2	69.182.92.195
234	235	Eric	Colford	1005 Oakhurst Ave.		High Point	NC	27262	336 255-6776	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	rcolford@msn.com	1	2005-10-10 12:03:39	2005-10-10 12:03:27	f4a0fa337e823447c0915f787546fd149	65.190.245.113
235	236	Roger	St Germain	5 Brookside Drive		Lincoln	RI	02865		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	rogerstg@cox.net	1	2005-10-10 14:47:31	2005-10-10 14:45:06	d12a8082cb3afa34a7f5312156b0f617	70.172.199.124
236	237	Jeffrey	Bachtel	1601 Vallyview Dr. #301		College Station	TX	77840		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	jeff@cephoid.org	1	2005-10-10 18:05:11	2005-10-10 17:52:48	c24790090723c284ea867e4382906abe	165.91.119.150
237	238	Carl	Keller	132 Nicholas Drive		Malaga	NJ	08328		0	It is my belief that this is not an attempt to preserve artifacts or sites and is a blatant attempt by the Government to regulate in the name of taxation and regulation. It is unfair.	crikel@snip.net	1	2005-10-10 20:36:21	2005-10-10 20:04:43	b23e5f4f2fd1227162261efdabd5a096	209.204.124.164
238	239	Judd	Lentz	3649 Riverside dr		Norfolk	VA	23502	7574806121	1	"I disagree with NOAA's proposed changes for the management of Stellwagen Bank."	jjkml@operamail.com	1	2005-10-10 22:57:55	2005-10-10 22:46:20	0bbb26edd82f3e09c17a885fdebdab9f	66.173.146.94
239	240	Gene	Peterson	2905 Fire Road		Egg Harbor Township	NJ	08234	609 641-7722	1	All shipwrecks in saltwater should have free public access and full salvage privileges to rescue artifacts being lost by the caustic effects of the natural enviroment. The federal government should concentrate our tax moneys on the relief effort of hurricanes, earthquakes, viruses, and homeland security. Turning recreational areas into patrol areas is an definalive encroachment on our freedom.	atlanticdivers@hotmail.com	0	0000-00-00 00:00:00	2005-10-11 12:02:30	cc6f5ab4242c722c3aee29c25f6665c	209.247.222.93
240	241	Daniel	Bader	14801 Armin Ave		Lakewood	MA	44107	216-228-3805	0	Please continue to allow scuba diving in the Stellwagen Marine Sanctuary	crashdiver9@yahoo.com	1	2005-10-18 16:02:28	2005-10-11 12:47:45	522320183e0ae5ba4c874835bb16694a	207.69.139.142
241	242	John	Gavroy	320 Harbor Village Dr.		Edinburg	PA	16116	724 658 1511	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	jpgavroy@flemingdoors.com	1	2005-10-12 12:45:10	2005-10-12 12:43:45	00696abd9ed2e795c0fd1389bdcc15f	69.162.228.18
242	243	Scott	Matthews	535 Crane Rd.		Venice	FL	34293		1	I think this will have a negative effect on the diving community.	toothdivr@msn.com	1	2005-10-12 19:40:39	2005-10-12 19:01:23	d1a03e7f469994179114aba574f5b8ff	71.101.234.28
243	244	Marcie	Bilinski	130 Northridge Drive		East Bridgewater	MA	02333	508-456-1234	0	I believe we should not have any type of restricted access to public resources and property and in fact resources such as this should be made even more easily accessible.	marcie.bilinski@gdc4s.com	1	2005-10-12 21:32:01	2005-10-12 21:30:37	58771b2b33d5c37d14c05870e16f3d72	24.218.175.190
244	245	Ian	Campbell	425 Danielson Pike		North Scituate	MA	02857	401-647-2061	0	I am in full agreement with the petition.	ianflyboy@att.net	0	0000-00-00 00:00:00	2005-10-14 13:31:26	a2db8bd82be29e5a717479b4ce9a1c13	70.184.14.64
245	246	DONALD	MORSE	6 HASKELL STREET		BEVERLY	MA	01915		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	DIVERDON40@YAHOO.COM	1	2005-10-16 12:50:17	2005-10-15 21:04:10	d1ccfa611674cc7cba5e074ae6e6948f	24.128.24.222
246	247	Kathi	Bell	1220 Massachusetts Ave		Arlington	MA	02476		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	kathijo@yahoo.com	1	2005-10-23 15:43:12	2005-10-23 15:42:44	b677057b9a56c34f1a27095c5b6f0bda	66.30.193.72
247	248	Jeffrey	Wiklund	81 Aster Circle		Weymouth	MA	02188		1	The proposed changes for management of Stellwagen Bank NMS are too restrictive.	aktunbuzo1@yahoo.com	1	2005-10-24 11:15:37	2005-10-24 11:03:34	5d5bea9abc5fe15e404faeed70760294	12.102.30.226
248	249	Michael	Lutz	64 mar vista ave apt 202		pasadena	CA	91106	605-645-9554	1	We as divers - but most importantly as the tax-paying public - have the right to dive in Stellwagen and visit ALL of its shipwrecks - and that includes the PORTLAND, the Palmer/Crary, etc. The Federal Abandoned Shipwrecks Act of 1987 requires that states facilitate access to shipwrecks - why should national marine sanctuaries be any different? one of 13 in our country	micheal.lut@gmail.com	1	2005-10-24 15:40:28	2005-10-24 15:39:55	fd78b60a5256734e4dad8631724a9df0	66.215.6.126

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
249	250	Robert	Lout	4 George Street		Holyoke	MA	01040	413 532 8217	1	These proposals restricting dive access are ridiculous! These are wreck sites! Somebody with SBNMS has too much time.	RPLT@comcast.net	1	2005-10-31 14:24:56	2005-10-31 14:22:09	a158d1f9eff4a91505cc18fba357bba	71.192.214.92
250	251	Vincent	Luciano	1828 Avalon Pines Drive		Coram	NY	11727	631-312-7004	1	Diver's access to the wrecks at Stellwagen Bank should not be limited by the government.	info@luciano.ws	0	0000-00-00 00:00:00	2005-11-01 08:53:49	33d20d9b36ae8e47531811951a1bbcd6	24.187.120.180
251	252	William	Hulik	13 Academy Lane		Budd Lake	NJ	07828	201-650-9456	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. These proposals artificially limit access to sites that will be destroyed by the ocean and storm action and thus will not be enjoyed by anything.	whulk@yahoo.com	1	2005-11-01 10:58:44	2005-11-01 09:58:21	6d85e2e51730f1cb95d0681bc2571257	63.115.18.19
252	253	Christopher	Miller	619 Wattaquodock Hill Road		Bolton	MA	01740	9786341046	1	I do not agree with NOAA's proposed changes for the management of Stellwagen Bank. I wish to keep more access to the public, especially scuba divers.	chris.miller@infofoundry.com	1	2005-11-01 10:07:28	2005-11-01 10:06:24	dac594f220fa179c1d2f235332739fce	199.5.47.1
253	254	Mark	O'BRIEN	16 Hillside Avenue		St James	NY	11780		1	Request the right to dive wrecks in marine Sanctuaries.	maobrien1436@hotmail.com	1	2005-11-14 15:47:24	2005-11-01 10:15:25	09bad9261812e470cd0ad79134d6f1b7	207.140.182.5
254	255	Frederick	Burgess	569 Fruit Hill Ave.		North Providence	RI	02911	401-354-8949	1	I disagree with the NOAA proposal regarding the National Marine Sanctuaries. Scuba diving is a sport which attracts a majority of citizens interested in ecology and history. The majority act with considerable discretion towards environmental sensitivity and the desire to preserve artifacts of a historical significance. The proposed guidelines would stifle and greatly limit recreational diving. More thought, funding, and development is needed before finalizing these proposed changes. We should be developing the ways and means to enhance the enjoyment of the marine sanctuary in an ecologically sensitive manner, not restrict it.	RIDiver55@aol.com	1	2005-11-01 10:49:51	2005-11-01 10:48:54	d1703f7a1f094fc1f8539d2e4b962ef0	204.17.80.4
255	256	James	Vafeas	7 Baldwin Street		Farmingdale	MA	11735	631-756-0924	1	Good Luck!	jmvafeas@hotmail.com	1	2005-11-01 16:37:11	2005-11-01 10:54:25	16eed030cd463aa9541be0aa07daefe0	64.215.91.79
256	257	Richard	Gonzalez	35 Deepdale Parkway		Roslyn Heights	MA	11577	516-621-8916	1	I reject the management and restricted access to the banks or any other body of water.	rgonzal@optonline.net	1	2005-11-01 20:43:10	2005-11-01 11:26:28	084b34cfc540faab029e92b5a28b5553	69.114.86.3
257	258	Marc H.	Landey	5 Calais Ct.		Rockville Centre	MA	11570	5167666155	1	I do not believe in restricting access to any wrecks or dive sites	landey354@yahoo.com	1	2005-11-01 13:36:51	2005-11-01 12:42:15	20993d7ea654900ebb49e85e76d074d6	67.100.8.168
258	259	Mike	Bakich	RR 2, Box 361		Paxinos	PA	17860		1	Divers need access to these shipwrecks. We enjoy diving them.	bakichmg@yahoo.com	1	2005-11-01 16:13:55	2005-11-01 16:12:11	d4a3d374e832883b229f3ea7793f32b	24.152.244.167
259	260	Jason	Richards	313 Juniata Ave		Delran	NJ	08075	856-824-0020	1	I urge the government to work with scuba divers to create a fair and equitable solution for all.	richards_jc@yahoo.com	1	2005-11-01 20:52:18	2005-11-01 17:09:56	f98e8267f75799bd7c59bc328baff633	68.60.234.228
260	261	Adam	Mandel	101 Coralie Dr		Summerville	SC	29483	8438713567	1	Although I have relocated, diving in the Stellwagen Bank NMS remains an important issue to myself and my diving companions. Do not make the misguided mistake in thinking that by restricting diving you will making a positive environmental impact.	diverdoc121@yahoo.com	1	2005-11-01 17:29:18	2005-11-01 17:28:09	a29fae4ad1f13754c95a0cdee46c8146	24.168.255.40
261	262	Judith	Workman	1133 Swanson Court		Reynoldsburg	OH	43068	6148822990	1	I believe in taking pictures and leaving bubbles. Don't restrict us from these sites.	rjwork@hotmail.com	1	2005-11-02 08:33:47	2005-11-02 07:22:39	a2ae6147ae6b12fb24c717322a04ae3b	206.173.110.13
262	263	Stewart	Pease	103 Clarendon St		Pittsfield	MA	01201	4134437788	1	Leave public access to wrecks alone.	firefighter@rnetworx.com	1	2005-11-02 08:32:46	2005-11-02 08:31:11	ddd086f44e7bb46a26ba72edb277c66	69.60.183.32
263	264	Joe	Porter	102 Huntcliff Dr.		Taylors	SC	29687	864-313-4755	1	I disagree with DJ!	joe@wreckdivingmag.com	1	2005-11-07 11:34:07	2005-11-03 11:49:17	fc0759ef2890fc43d7e273ed7b9aa123	68.28.251.113
264	265	Mr. Richard	Spadola Sr.	255-32 149 Ave.	Rosedale	New York	MA	11422	17189783052	1	I have read your e-mail and believe that this country is becoming a democracy within a dictatorship. Only the filthy rich have enjoyed full democracy. Every day this government creates new laws that take our rights away, and are enforced by our legal system.	romen2132@worldnet.att.net	0	0000-00-00 00:00:00	2005-11-04 19:32:43	3a206d9b19fa56d46a8a7199c999a83e	209.247.222.99
265	266	James	Jones	2627 narrows way		akron	MA	44312	330 606 1803	1	good job	james_jones497@yahoo.com	1	2005-11-05 22:10:31	2005-11-05 22:09:49	50123bc047c6fec9d790586407d2c696	24.166.70.68
266	267	Richard	Shadock	3 Roxbury Lane		Massapequa	NY	11758		1	I disagree with NOAA's proposed changes for the management of the Stellwagen Bank.	cheers2@optonline.net	1	2005-11-10 01:30:46	2005-11-10 01:29:21	35e4036f209458b5bbf8304f1043fc20	68.194.246.126
267	268	Daniel	McLaughlin	25 Richardson Lane		Islip	NY	11751	531-650-1513	1	I petition against the proposed amendment .	saaz@optonline.net	1	2005-11-10 13:46:45	2005-11-10 13:39:01	4bcc4a76ba7d74b95d48c026dd4377de	69.113.23.150
268	269	Mark	Cavanaugh	P.O. Box 1313		Londonderry	NH	03053	6034348532	1	Our Undersea treasures, either natural or man made through accident, war, or folly, belong to every citizen of this Country. We do not need more restrictions on our individual freedoms. While I firmly believe in conservation to protect our natural and other resources, a few bureaucrats with a self imposed "plan" for the rest of us is a terrible thing. Absolute power corrupts absolutely. We need to protect our resources, but still allow access without more federal or state red tape disguised as a management plan, controlling our lives, and desires to venture beneath the Sea.	landandsea24@adelphia.net	1	2005-11-17 16:14:44	2005-11-16 08:47:07	77fc92187dd7e5c20632b3b7c47e7dc	65.112.20.131

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
269	270	Henry	GODIN	1 CHRISTOPHER DR		Johnston	MA	02919	401 934 2820	1	WE STILL CALL IT AMERICA...RIGHT?	INKABODPAIN@AOL.COM	1	2005-11-16 10:33:43	2005-11-16 09:56:22	8eb8d319d9c5b7af55fa770c9e894	68.110.195.75
270	271	erik	ekroth	222 laft ave		warwick	RI	02886	4017362962	0	I do not agree with the changes to the management of stellwagen banks	warfire107@cox.net	1	2005-11-16 10:51:53	2005-11-16 10:51:30	df5a3b4c1a2287e01bfc246cb78796a	24.250.5.200
271	272	David	Stoehr	99 Nepaug Road		Narragansett	RI	02882	401 225-0009	1	While I disagree with there use of the term special interests, I do agree the proposed rules are too restrictive to divers.	d.stoehr@cox.net	1	2005-11-17 17:32:10	2005-11-17 07:55:38	d6fe860977f0c1e98ae7cb992190/ba0	164.223.72.7
272	273	Scott	Annis	49 William Court		Wolcott	CT	06716		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. The response to the objections cited by the Bay State Council of Divers from Superintendent MacDonald does almost nothing to address their objections to the proposed management plan.	swannis@adelphia.net	1	2005-11-22 08:45:01	2005-11-21 14:14:08	ef922489c1dc178ca14f74dc8c8b19e	69.173.106.19
273	274	Elena	Salerno	284 Candee Ave		Sayville	NY	11782	6312443690	0	My husband is a scuba instructor and tech diver.	ellie511@optonline.net	0	0000-00-00 00:00:00	2005-11-21 22:21:23	b7989bcfa56b9818caa795c2dd0110c	68.195.93.75
274	275	Richard	Hartford	176 Manning St.		Hudson	MA	01749	978-424-1942	0	We need more protection from NOAA.	rhartford@hotmail.com	0	0000-00-00 00:00:00	2005-11-22 00:38:05	6532e1bf0fa3af18e7160c25246a10da	68.163.96.169
275	276	Clare	Petosia	28 Country Club Drive		Neptune	NJ	07753		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	njdiver@optonline.net	1	2005-11-22 12:29:44	2005-11-22 12:29:10	407d900337faa385e7aea0b279f61c56	160.254.107.55
276	277	Capt H. Lee	Livingston	730 North Madison Rd		Guilford	MA	06437		1	none	leealg@comcast.net	1	2005-11-23 08:39:55	2005-11-23 08:37:57	b9d9f79b51db9187fa96c17bd6ac1b0	67.186.147.122
277	278	Alfred	Tessier	362 Scruton Pond Road		Barrington	NH	03825-4021		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	NHdiver@metrocast.net	1	2005-11-26 18:22:35	2005-11-26 18:02:28	6466569b819f9a3b1fca9a9f817b3	65.175.226.50
278	279	Bjorn	Bakken	44 Spring Street		Shrewsbury	MA	01545		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	gayleogbjorn@townisp.com	1	2005-11-26 20:43:23	2005-11-26 20:42:53	b1a025126f7b5732f8f2b747bd9f588	216.195.8.151
279	280	Charles	Firton	311 Litac Drive		Union	NJ	07083		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	njdivr@msn.com	1	2005-11-28 10:48:54	2005-11-28 10:48:04	4239c8b18517b1eab38d0a01a6a6983f	70.111.199.216
280	281	John	McErlain	94 Primrose Ct		Mt. Laurel	NJ	08054		1	I OPPOSE NOAA's proposed changes for the management of Stellwagen Bank	jmcerlain@jmsonline.com	1	2005-11-28 12:01:43	2005-11-28 12:01:07	d85af2e53afc537218a698c59440acc	12.108.99.30
281	282	Thomas	Robinson	49 Poplar Ave.		Fair Haven	NJ	07704	N/A	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Everyone that wants to should be able to look at these wrecks! This is just another example of to much government.	thomas.robinson5@us.army.mil	1	2005-11-28 15:33:00	2005-11-28 15:32:19	dea5e569435d4b4902b9d58c3acd830	192.172.8.13
282	283	Jeffry	Horowitz	4 Salisbury Point		South Nyack	NY	10960	845-429-5381	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	jhorowitz@northernriverview.com	1	2005-11-29 08:47:47	2005-11-29 08:43:44	e6acbbe88a81b606c790bb6a5f6eb265	216.44.2.16.211
283	284	Sterling	Levie	34 Wildhedge Lane		Holmdel	NJ	07733	732-946-8712	1	As a certified, wreck-visiting, knowledgeable scuba diver, I have an informed interest in the SBNMS proposal. Declaring shipwrecks as historic sites is analogous to declaring car wrecks as historic. It's pointless (except for the few authentically historic wrecks). The bulk of shipwrecks are living environments for marine life. Analogous to geographic features in national parks, they are meaningful only if they can be visited. It would be more a helpful use of bureaucracy to track visits, perform fish censuses, and regulate intensity of use BASED ON INDIVIDUAL SITE DATA, than to be a bar's bouncer.	s3k4@yahoo.com	1	2005-11-29 16:05:47	2005-11-29 08:50:59	f20516edfde38f874dc9eb12a426ba8	68.38.7.31
284	285	Melissa	Lansley	12 Lonview Drive		Rockaway	NJ	07866	973-723-9167	0	I feel it is my right to dive the area	msouto@siac.com	1	2005-11-29 12:02:42	2005-11-29 12:00:53	16a84b83a7ebfd9a5b84f8a1fbc84d1	198.140.63.116
285	286	Barb	Sylvestre	PO Box 278		Milford	MA	03055	603-387-1877	0	Certified divers should be allowed to expore the area. Generally divers do more good than harm while underwater. Just about every dive I have ever done I have come up with at least 1 beer can. With over 5000 dives, think how much clearer the water is	barbdives@yahoo.com	1	2005-11-29 12:21:47	2005-11-29 12:15:42	b6dc9f6aee8ae87a795ae8503db7905	70.109.130.47
286	287	Steven	Marentis	58 Old Stewart Ave		Garden City Park	NY	11040	516-747-5678	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank	SMarentis@soundac.com	1	2005-11-29 15:41:43	2005-11-29 15:41:10	49584ddf85c93a97b3fa4a95645cb9d6	64.232.31.226
287	288	Frank	Lipere	139 Queen Ann Rd		Brick	NJ	08723		1	I strongly disagree with NOAA's proposed changes for the management of Stellwagen Bank	flip17@verizon.net	1	2005-11-30 10:55:31	2005-11-30 10:54:13	2926dd0ed5a50cdc3d80ee2addf232aa	68.239.242.78
288	289	Christine	Duval	1085 Oak Hill Road		Fitchburg	MA	01420		1	Please reconsider restricting access.	scubachick@andysportsshop.com	0	0000-00-00 00:00:00	2005-11-30 12:30:20	9e03a3d09cdd0eb9b69604ae0d0a983	70.22.130.214
289	290	Dan	Lieb	107 Wilson Road		Neptune	MA	07753		0		Aqualieb@aol.com	0	0000-00-00 00:00:00	2005-12-01 12:33:15	20e8c510639c9d1fd152c6aee15a4a41	63.169.115.71
290	291	Daniel	Brown	605 Fletcher Lake Avenue		Bradley Beach	MA	07720	732-778-6490	1	Scuba Divers should be allowed to dive on any wrecks they desire without interference. For the most part people become scuba divers because they RESPECT the ocean and EVERYTHING IN IT !!!	DiverDB@msn.com	1	2005-12-01 21:01:35	2005-12-01 17:24:08	0a5fe425c8970120ad59955c8ebc21e	151.198.125.62
291	292	Michael	Ryan	2203 Edgar Road		Point Pleasant	NJ	08742	732 600-1934	1	this is unfair in that it only allows archeologist to dive on and take things off of wrecks	decolyme645@comcast.net	1	2005-12-01 21:48:37	2005-12-01 21:44:14	67dc4020b36473127534af4f89259929	68.36.197.29
292	293	Jineane	La Bate	23 Bowne Avenue		Freehold	NJ	07728-1660	732-409-2997	1	I think it wrong of the proposal which will prohibit the sport diving of visitiing these wrecks whether historical or otherwise.	Jineane7@msn.com	1	2005-12-02 12:56:42	2005-12-02 12:06:52	5de9264b8412e314f05a1acee8bf5460	70.111.248.225

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
293	294	Mike	Skuya	8 Old Farm Road		Warren	NJ	07051	7322715160	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. We don't need any more regulations for fishing or diving, thank you.	arleen.skuya@verizon.net	1	2005-12-04 10:00:20	2005-12-02 16:52:53	dca63d0101ce287631f6a7db5d5dbf0	68.162.58.62
294	295	Diana	Harmon	9 Elizabeth Pkwy		Eatontown	NJ	07724		1	I strongly disagree with NOAA's proposed changes for the management of Stellwagen Bank.	ladydiver@comcast.net	1	2005-12-02 18:51:08	2005-12-02 18:31:41	bf7bec78d1e86494a7e3109cc8a60d	68.44.78.58
295	296	Stephen	Picardo	21 Hatters Hill Rd		Medfield	MA	02052		1	Fully support this proposal	stephen@picardogroup.com	1	2005-12-05 13:09:38	2005-12-05 12:40:39	5201ddcc04ac5d68c4474f1192f7caff8	68.162.253.19
296	297	Doug	Bell	749 West Long Lake Rd.		Traverse City	MI	49684	231-943-4258	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	dab749@charter.net	1	2005-12-12 19:22:49	2005-12-12 19:00:57	35d9654a87172944011459bacd33260	24.236.214.155
297	298	David	Faye	392 cambridge Street		Cambridge	MA	02141	617 661-8600	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Stellwagen should remain accessible to researchers, explorers and divers.	dfaye@erofs.com	1	2005-12-13 22:08:05	2005-12-12 20:15:54	c360e932b9d1e3714d55709a46843a20	24.147.82.42
298	299	F. Gregg	Bemis Jr	3876 Old Santa Fe Trail		Santa Fe	MA	87505	505-982-1717	1	Congratulations. Please keep us informed	gbemis@swcp.com	1	2005-12-13 10:06:56	2005-12-12 23:17:57	1c4db4a526d1b5511edb26dfdc0bc6bf	216.184.7.73
299	300	James	Sinclair	15 Marlin Dr.		St. Augustine	FL	32080	904-819-0408	1	Keep up the good fight, we here in Florida have been wrestling with same form many years. Our organization the Historic Shipwreck Policy Council HSPPC and affiliate ShipRex Int. Have been at now for quite some time the problem is that with each new crop of mid-level federal employees the education process must start all over again. Best of luck in your efforts, Jim Sinclair, MA, RPA Archaeologist	jmsinclair@searex-inc.com	1	2005-12-13 07:48:42	2005-12-13 06:01:44	26fd4929529c533ef141a580cd90400f	24.26.24.135
300	301	Michael	Lewis	13500 Maple Leaf Drive		Garfield Heights	MA	44125	216-346-2250	1	I am in full support of this petition.	mjlewis@core.com	1	2005-12-13 08:18:15	2005-12-13 08:14:17	5eac2fd9303bfd1d759f142cf7014d32	156.63.242.3
301	302	Andrew	Donn	1115 S Edison St		Arlington	VA	22204	703-931-6517	1	Just say "NO" to government regulation.	andrewdonna@msn.com	1	2005-12-13 10:33:35	2005-12-13 10:27:42	6ca0f269364635531a15f3f6fd0d2e358	199.36.20.5
302	303	Richard	Hansen	310 N Meridian #201		Puyallup	WA	98371	253-770-8098	1	As Vice President of ProSEA and Shiprex I have grave concern of government carte blanche control of any wrecks. Give an inch they take a mile, often for self preservation without best of intentions.	rick@maritimeall.net	0	0000-00-00 00:00:00	2005-12-13 11:35:33	163eabc07a5d2acb471bb2b978753d3	207.254.98.196
303	304	Peter	Hess	PO Box 7753		Wilmington	DE	19803-7753	302.690.1715	1	The presumption of innocence requires NOAA to not outlaw diving on ANY wrecksite, historic or otherwise, until there is evidence of wrongdoing by divers. The proposed approach in Stellwagen Bank NMS is precisely wrong and vilifies the diving community from the get-go. More importantly, it contradicts the Marine Sanctuary Act, in which Congress declares that Sanctuaries are to be open to the widest possible public and private usage consistent with the protection of the resources therein.	Hessians@aol.com	0	0000-00-00 00:00:00	2005-12-13 14:18:06	e9bf0760e62c972818c1b6c11e046063	69.136.250.44
304	305	Officer Rob	Davie	16502 Oxnard Lane		Friendswood	TX	77546	281-615-1916	1	As a diver, a tax-payer, and as an officer of the law here in Texas, I am offended by this attempt to put totally unnecessary bureaucratic restrictions on these dive sites.	airlandseatrg@sbcglobal.net	1	2005-12-13 15:14:35	2005-12-13 15:12:13	27df7a36a9646bc89bedd073ff460e51	70.241.118.118
305	306	David	Schott	106 Judy Way		Aston	MA	19014	6103647850	1	We reject the proposed classification system for maritime heritage resources (e.g. shipwreck sites) in its entirety, including the stipulations attached to each designation, (as outlined in the Action Plan and any management plan derived from it). The classification system proposed in the MHR Action Plan is too restrictive on access; it is highly subjective, with many shipwreck sites likely to become restricted from public access. For example, even "public access" shipwreck sites call for an inappropriate level of monitoring. Newly discovered shipwreck sites should be studied; however, without a time limit on the assessment period of newly discovered shipwreck sites, a site can be withheld from the public indefinitely. This is unfair and unnecessary. Newly discovered shipwreck sites must be inventoried in a timely manner and subsequently shared with the public, which means facilitating access. If anchoring and use of ground tackle on shipwreck sites is to be prohibited, then the sanctuary must make a commitment to establish and maintain mooring buoys on wrecks likely to host regular visitation.	vschott@comcast.net	1	2005-12-14 18:04:07	2005-12-14 18:03:51	16088bf1253ea01b1497af129ee09945	69.139.165.209
306	307	Anne	Dashevsky	1215 Adams Way		Neptune City	NJ	07753	732-775-6494	1	There should not be any restrictions on shipwrecks off the New England coast--there are so few of us divers anyway, let us enjoy these resources too!	annedashevsky@netscape.net	0	0000-00-00 00:00:00	2005-12-15 20:54:50	7d41f79b82a8311fa6f94fb659ea96b0	70.111.56.144
307	308	Kevin	Costantino	114 claypool dr.		Warwick	MA	02886	401-736-0177	1	thanks	ndiver@cox.net	1	2005-12-18 17:37:01	2005-12-18 17:36:41	9dd6d55bc98190b335c65a3b06600f44	68.9.110.204

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
308	309	Richard	StGermain	1 Riverbend Rd		Upton	MA	01568	508.529.6154	1	I disagree with NOAA's proposed management plan and feel the public should be included in the discovery and assessment of new or significant sites within the sanctuary Thank You, Rick StGermain	rick_stgerman@charter.net	0	0000-00-00 00:00:00	2005-12-22 21:38:11	6584e770251345452c6c694cb8fac561	71.10.239.195
309	310	Thomas R.	Yerian	1621	.Ritter Cir	Port Royal	SC	29935	843-522-9705	1	I am a certified Technical Instr. Trainer, in several organizations, and I as only one of many divers/instrs. who promote diver safety and conservation, do object to any restrictions placed on diving in the area. We, as divers are the first line of defense in the protection of, and the reporting of careless use of the area by, boaters, commercial activities, ect. Divers are actually the vanguard forces for protection. To restrict divers is to limit a valuable resource for the conservation of that area...Thank You	tyerian@charter.net	1	2005-12-23 15:36:52	2005-12-23 12:15:54	294d31c06c5f717e69ebc8cb217642a2	71.81.96.24
310	311	Renee	St Germain	555 Turnpike Street		Canton	MA	02021	781-828-9300	1	I oppose NOAA's proposed changes for the management of Stellwagen Bank	rstgermain@cml.com	1	2005-12-27 15:52:43	2005-12-27 15:47:56	a1b15d4f26a1a06159e0f0c79211d88	63.145.6.126
311	312	Chad	Smith	1136 N 115th St	A202	Seattle	WA	98133	6179055212	1	NOAA's proposed changes are unacceptable to the diving, tax paying public who visit the submerged wrecks. I am a frequent diver of Massachusetts Bay.	mariner79@verizonmail.com	1	2005-12-29 01:46:25	2005-12-29 01:06:03	85444421a8a1ce6ab3a1c900d766e0af	24.16.255.94
312	313	Raymond	Picard	16 Wesleyan Ave		Coventry	MA	02816	401-821-5896	1	Our marine history cannot be truly appreciated without unrestricted access for those adventurous few willing to brave the elements and fulfill the inherent human desire to explore and to learn and experience history first-hand. Truly, what good is a marine sanctuary if it is allowed to merely decay into it's constituent elements without ever having been seen, touched, and experienced by those with the burning interest and desire to experience these unspoiled and unaltered remnants? Music is not music unless it can be heard. A sanctuary dedicated to preservation is not a sanctuary unless that which is being preserved can at least be seen and visited.	U-853@msn.com	1	2005-12-29 18:09:05	2005-12-29 18:08:14	63fbd99ae60d68c7342d411796716b	64.222.51.14
313	314	Fred	LeBlanc	25 CROSS ST		Bellingham	MA	02019	508-883-9861	1	I wish to keep sport diving alive and well. Lets all share the same waters.	fredleblanc4@netscape.net	0	0000-00-00 00:00:00	2005-12-30 16:08:35	57a13d887c2bb3b490d22feb135e965	24.218.64.179
314	315	Alan	Reilly	7 Willerval Ave.		No.Smithfield	RI	02896	401-766-1274	1	I disagree with NOAA's proposed changes to Stellwagen Bank. I believe that discovering our history is extremely important for all future generations.	a-reilly@cox.net	1	2006-01-19 16:38:30	2005-12-31 13:31:08	0162d71b032d64cd05c2ec3ada6f14be	68.9.183.180
315	316	ed	paupreto	11 highland st		milford	MA	01757	508-634-1414	1	its ridiculous trying to keep people away from learning and diving these areas.	edpp@hotmail.com	1	2006-01-02 07:03:27	2006-01-02 07:02:24	e415de9fda66144f9d46cb074fcc367c	68.160.26.40
316	317	Martin	Wright	Luetzelastrasse 50		Weggis, Switzerland	TX	6353	+41-41-3900629	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	mcwright@btuwin.ch	1	2006-01-16 08:46:51	2006-01-13 06:41:18	d6e5106b54076e59864853e758c3a2ce	198.176.190.201
317	318	James	Blake	16 Tobin Ave.		North Chelmsford	MA	01863	(978) 251-7833	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Public access, especially for recreational divers, needs to be addressed under the management plan, as well as a workable arrangement for assessment of newly found wrecks which will enable future exploration by recreational divers.	jblake.ma.ultranet@rcn.com	1	2006-01-24 12:45:01	2006-01-24 12:44:05	7d49507fce967510446fcb39d722514	129.53.219.20
318	319	Kirstie	Perez	3169 E Crystal Waters #5		Holland	MA	49424	616-786-3874	1	I am learning to dive wrecks, and the sheer amount and quality of wrecks in this area need to be available to us!	plain_k@yahoo.com	1	2006-01-26 10:19:59	2006-01-26 10:14:01	ddf70b2a7150185fb3429264911dcfe6	68.79.132.2
319	320	Scott	Kroll	37 Allen St		Arlington	MA	02474		0	I would like to do what I can to be part of this project. Best of Luck to you.	skphotos@gmail.com	1	2006-01-27 10:17:49	2006-01-26 16:21:42	4f21b8f306b28839ca9d93dc70ba2e6	4.36.213.116
320	321	Richard	Boucher	10 Winnecowett Dr.		Ashburnham	MA	01430	(978)827-5043	1	Please do not restrict access to the Stellwagen Banks, leave them wild and open to all to enjoy and explore.	rickboucher@msn.com	1	2006-01-29 08:40:10	2006-01-28 17:00:28	77b1781f3f2f81b79be39f101e7f3341	24.63.171.16
321	322	David	Lawrence	15 Mortimer Rd.		Sterling	MA	01564	(978)422-8128	1	Way too restrictive. Adopt the Thunder Bay Regulations Our history needs exploration by those willing to do the work. The wrecks contained on the banks will not be there forever....don't let us lose the chapters which make up our own book of history.	dpljr@earthlink.net	1	2006-01-29 11:01:41	2006-01-29 10:59:54	5f1fbccd889bab1bc305507d014bb899	24.41.92.208
322	323	Bryan	Sorensen	51 Albert Avenue		Edison	MA	08837	7326627478	1	Full support for petition	bsoren@optonline.net	1	2006-01-29 23:05:33	2006-01-29 23:02:28	11db4c2911cb0bda6c2f01d6c0685d	67.85.240.46
323	324	Kristine	Olmsted	1124 Whippoorwill Lane		Raleigh	MA	27609	919/632-4079	0		rae_kristine@yahoo.com	1	2006-02-02 10:38:06	2006-02-02 10:16:13	921fd1a3dccc27ac953fbc3d3a1ecec8	152.5.254.13

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
324	325	Allen	Kirby	75 Becky Dr.		Rossville	GA	37343	(423)544-4550	1	I'm signing this petition because I disagree with NOAA's proposed changes for the management of the Stellwagen Bank. Thank you, Allen Kirby	aqualovr1@yahoo.com	1	2006-02-03 15:56:03	2006-02-03 10:27:38	9d6aa9d0f0dd47eace48a515a9ed503	69.254.80.34
325	340	Mike	Boring	12912 S. Chester Road		Chester	MA	23831	804.796.6640	1	Restricting access to these wrecks will only hinder the preservation of history, not advance it.	mhboring@yahoo.com	1	2006-02-22 18:07:43	2006-02-22 18:05:39	db59990942f1f98dd2fd394785f67bc28	70.105.40.97
326	341	Rafael	Del Razo	31A Cottage St.#2		Boston	MA	02128	(617) 543 4333	1	I just want to say, please do not take away from me the opportunity to dive this sites. Diving for me is more than a sport or favorite pass time, SCUBA diving changed my life in a very positive way, and i really loved it, and for me one of the best parts of diving is being here in Boston and diving in the sanctuary is one of my dreams the wrecks located there are on my list of things i have to do, and it will be very sad to be shut down. Thank you.	rafaelyeve@hotmail.com	1	2006-02-23 21:17:58	2006-02-23 16:56:30	2fd00fa840a281801a5bfff2eecb56da	205.158.158.34
327	342	Jack	Bliesath	269 Frederickville Rd		Mertztown	MA	19539		1	This should not be put off limits just because the government believes that they have sole rights to the wrecks. All this will do is to allow these wrecks to rot, because NOAA doesn't have the resources or talent to locate, investigate and catalog the information on these wrecks.	sprat@ptd.net	1	2006-02-26 12:33:52	2006-02-26 12:31:38	a70634422d02756f04c69ff799620de2	70.44.53.184
328	337	Rich	Venuti	Box 305	2 Grove Ave.	Clementon	NJ	08021		1	"I disagree with NOAA's proposed changes for the management of Stellwagen Bank." Although I can agree with some restrictions to public use in a sanctuary, such as dragging through a known wreck site with commercial fishing gear, or knowingly destroying a historical wreck site, non-intrusive activities such as diving should not be included. More damage to the ocean environment is done by the fishing industry, than could ever be done by diving on a wreck. The use of permanent moorings can eliminate damages to the site which would occur during anchoring. It would be cheaper for the government to install moorings, than to police an entire sanctuary area! Let the government work with the diving community, not against it.	jerseydiver@hotmail.com	1	2006-02-19 08:36:33	2006-02-19 08:35:12	1c4397fe97fb9c6474246501f2e6b605	209.204.64.141
329	330	james	hilt	po box 563	2788 sawyer rd	gaylord	MI	49735	9893903784	1	I feel that sancuarys and reserves are a fine idea for any area that should be cared for as long as it follows the normal reasoning which is to preserve FOR PUBLIC USE.	jhilt@immml.com	1	2006-02-08 11:49:55	2006-02-08 11:47:05	d3a8e077c6027d6bd058ab83012dd4d8	12.27.14.178
330	343	Roland	Campbell	72 Van Buren St		Port Jefferson Station	NY	11776		1	While it is important to protect the undersea heritage, it only lasts for a finite period of time. If serious study is not planned for a wreck it should be open to the public before it goes away	roland.campbell@gmail.com	1	2006-03-05 10:24:35	2006-03-05 10:23:43	4d2b499f66b970c3b4abab968bc7ef75	69.113.107.255
331	344	R MICHAEL	SMALL	8 DEBRA LANE		KITTERY	ME	03904	207.439.2810	1	I DISAGREE WITH THE PROPOSED CHANGES TO THE MANAGEMENT PLAN OF STELLWAGEN BANK.	R_MICHAEL_SMALL@JUNO.COM	1	2006-03-05 14:30:04	2006-03-05 14:08:26	1d19a0aac62b4dc537165302a5e64d1d	70.20.48.39
332	345	Edward	Ockerby	73 Decatur Street		Arlington	MA	02474	781-646-5532	1	I understand that NOAA wants to protect these wrecks and the ecosystems. The current legislation is so broad in scope, and I wonder how it will be possible to enforce the fishing regulation, as they are currently written, furthermore who will be enforcing these rules. As Diver who does wreck diving, it has been my experience that my fellow wreck divers are usually well trained and want to take in the history of the wreck. Captains of these vessels that visit the wrecks for the most part would never grapple into the wreck. If NOAA, the Diving community and other regulatory agencies work together on this a feel that a GREAT piece of legislature could come out of it. From the Federal side, lets put together regulations to protect and preserve these wrecks in cooperation with both State agencies and the diving community. Allow the diving community to serve as a monitoring agency for these wrecks.	edwardock@yahoo.com	1	2006-03-15 11:31:54	2006-03-15 08:54:30	c3ff7a7f6e3c1e4e7432b36942f72912	66.89.219.99
333	338	Richard	Hartford	11 Lake St #132		Hudson	MA	01749		1	The Stellwagen Bank National Marine Sanctuary must saved from any encroachment !!!	rhartford@hotmail.com.com	0	0000-00-00 00:00:00	2006-02-21 20:34:24	b4063c9b788c9a5e788e7e52aa85b359e	66.19.201.164

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
334	339	Sharon	Kissling	4406 Jason Ct.		Wilmington	NC	28405	9104525139	1	I believe that NOAA's proposed changes for the management of Stellwagen Bank are overly and unnecessarily restrictive to the public. I've been involved in scientific research on Stellwagen Banks and do not agree with these changes....thank you	skissling@cc.rr.com	1	2006-02-22 08:29:59	2006-02-22 07:46:27	5ab296b9b5b59e8f6836f9d785132d9	66.56.202.87
335	346	Steven	Moore	54763 Pine Street		New Baltimore	MI	48047		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	deep06@sbcglobal.net	1	2006-03-16 12:08:43	2006-03-16 12:03:56	c569c37ae4af4e7206b3c6bd0cda8da0	70.227.11.130
336	347	Paul	Christenson	895 Van Sicklen Rd		Williston	VT	05495	802-860-3919	1	I think that NOAA's proposed changes for the management of Stellwagen Bank border on stupidity :-(	PaulChristenson@aol.com	1	2006-03-17 00:15:10	2006-03-17 00:14:29	b3b6363885bdb04663b7e8b2ba0139e7	152.163.101.13
337	353	Patrick	Ahearn	19 Cross Street		North Attleboro	MA	02760	508-643-9344	1	Do not close our waters to scuba divers.	pahearn@nymc.com	0	0000-00-00 00:00:00	2006-04-30 16:46:12	dc8ac44da969ca24f1215d959ad0b5c0	71.243.19.74
338	354	Raymond	Hill	PO Box 752		Northbridge	MA	01534-0752	401-741-8185	1	Hi, I think that the regulations proposed unnecessarily restrict divers ability to access and explore sites within the discussed area. Thank you, Raymond Hill	rjhill3@cs.com	1	2006-05-04 22:04:29	2006-05-04 21:50:13	0de6128d350da99af68f2e5b7f6e508	66.189.27.175
339	355	David	Fitzpatrick	1281 New Boston Road		Fall River	MA	02720		1	Ref: <a href="http://www.shipwreckdivers.org/response.shtml">http://www.shipwreckdivers.org/response.shtml</a> "...shipwreck sites should be studied; however, without a time limit on the assessment period of newly discovered shipwreck sites, a site can be withheld from the public indefinitely. This is unfair and unnecessary."	aNighDiver@hotmail.com	1	2006-05-10 14:44:45	2006-05-10 14:44:29	1069ab29d9d1312189f9d0cfded5a0	65.204.211.10
340	350	William	Pardee	10305 Parkcrest Dr		Tampa	FL	33624	813-968-8038	1	The diving community and the general public have a right to access these areas, they belong to US not the agencies charged with their care. Not only is this unjust, but also is an insult considering the contributions of the private sector diving community to archeology, geology, and marine conservation. Have those who govern this nation forgotten that they work FOR the people? As I understand the Federal Abandoned Shipwrecks Act of 1987 divers are allowed reasonable access to shipwrecks. Are there special extenuating circumstances present at Stellwagen Bank National Marine Sanctuary that should limit public access? Why would the federal government mandate the States follow one set of guidelines and excuse themselves from their own mandates?	admin@berlindrafting.com	1	2006-03-27 10:52:05	2006-03-27 10:51:50	1ca054e28c9e0db2669d04f94275944e	71.41.70.138
341	351	David	Stewart	118 Decker Drive		Newark	DE	19711	302-731-4493	1	I fully disagree with NOAA's proposed changes for the management of Stellwagen Bank.	crisis_12@comcast.net	1	2006-04-03 12:37:17	2006-04-03 12:33:50	4500ffe7eb0925a1d03c8ee401ab5341	71.225.180.189
342	352	Elizabeth	Young	14 Gale Street		Malden	MA	02148	781-321-0308	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	lizayoung@comcast.net	1	2006-04-05 16:18:09	2006-04-05 15:14:56	b9103fb84c2ac3b7cfe83d340913f4c5	66.31.50.16
343	356	Andrew	Fallon	1206 Green End Avenue		Middletown	RI	02842		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	newportstair@cox.net	1	2006-05-15 17:29:26	2006-05-15 17:28:42	2eec0411e79d9079a911995c1ac9d999	68.0.224.154
344	385	Paul	Flynn	22 Karen Circle		Holl	MA	01746		0	stellwagen belongs to the people, not just whales. divers should not be restricted from swimming there!	kim_paul_flynn@yahoo.com	1	2006-10-12 19:49:05	2006-10-12 08:05:00	385ba48245114414a865150d7bc66164	12.30.230.138
345	387	jeff	fowler	145 west ironstone rd		harrisville	RI	02830	401-568-1409	1		nicehd@cox.net	1	2006-10-28 19:53:56	2006-10-28 19:49:23	895d114d8895519e1149d527d073ad9c	68.109.30.2
346	365	Robert	Melideo	26 Nelson Ave		Georgetown	MA	01833	978-352-2293	0		bob.melideo@verizon.net	0	0000-00-00 00:00:00	2006-05-30 22:23:17	6a8fa54571c93d00f93e69d4eb541c	141.149.184.91
347	366	Howard	Chalmers	3454 Toomer Kiln Cir		Mt Pleasant	SC	29466	843-568-4973	1	There is definitely a need to segment the diving community from a comment perspective. Both recreational and technical divers have valid, although likely different, perspectives on the NMS.	hchalmers@yahoo.com	1	2006-06-02 08:24:22	2006-06-02 08:22:37	efb4b437c8318297a188200a12da81aa	216.235.192.10
348	367	Philip	Mercurio	4802 51st Street West	Apt. #1309	Bradenton	FL	34210		0	I support this.	pmercurio@gmail.com	1	2006-06-02 08:55:06	2006-06-02 08:53:46	8347c8a1a84e3549b66548593288560a	12.174.211.170
349	368	Leo	Laskin	21 Debra Lane		Framingham	MA	01701		1	Under no circumstances would I support the action plan in its current form. This restricts public access to public property which is ridiculous.	llaskin@gmail.com	1	2006-06-02 11:01:24	2006-06-02 10:45:16	08c57eb90e53b7301d65620318b561ad	24.60.55.188
350	369	STEPHEN	PACE	PCU GRIDLEY	590 WASHINGTON ST.	BATH	ME	91935	619-200-1736	1	Please leave all wrecks open to divers. Divers play a big part in the history of our nations ship wrecks. I would be happy with a no touch policy but we should be able to look and explore. Thanks, Steve Pace active duty U.S Navy	dcpac@hotmail.com	1	2006-06-02 23:36:17	2006-06-02 21:29:15	f388f6982b965ae985f53f3a4c2758a9	64.136.49.228
351	370	Willie	Strickland	172 Brazos Point Dr.		Waco	TX	76705	254-799-3293	1	Please reconsider these excessive restrictions.	willie@igc.org	1	2006-06-02 23:14:22	2006-06-02 23:07:32	604a526c056638e4864736cf5b6540e2	64.194.106.99
352	371	Jonathan	Faucher	7 Grassy Plain Rd.		Barrington	RI	02806	401 246 2010	1	While I am against taking artifacts or disturbing wreck sites, I am even more strongly opposed to governmental restrictions on dive site access. Management money would be better spent on enforcing existing laws, and diver education programs.	jonathan.faucher@verizon.net	0	0000-00-00 00:00:00	2006-06-03 06:11:04	aa78431fb471ba77e5acb2ff1b00c69f	70.109.202.179

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
353	372	Thomas	Stange	133 Curtiss Street		BRISTOL	CT	06010	860-585-1442	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. Thomas R. Stange	mover_59@yahoo.com	1	2006-06-03 14:29:06	2006-06-03 14:28:44	1377b209641eefba186c9af93e9e56e1	66.159.146.208
354	373	David	Moysey	3206 Wynford Dr		Fairfax	VA	22031	703-816-8092	1	There is no reason to restrict access to this area. Please listen and work with the divers.	dmoysey@arccorp.com	1	2008-06-05 15:37:04	2008-06-05 15:36:36	1b8b4264f823703efe0d43d1953883ab	68.163.68.50
355	374	bob	porter	po box 524		centereach	NY	11720	6315672996	1	I disagree with NOAA's proposed changes for the management of Stellwagen bank. Its all just rusting away	welderbob@gmail.com	1	2006-06-15 17:25:33	2006-06-15 17:01:26	0cd40da04af67e3af633bf0c356346ed	69.113.222.213
356	375	Richard	Lamb	9915 North Wildflower		Cedar Hills	UT	84062	801 796 6235	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	rlambdvm@hotmail.com	1	2006-06-15 18:27:34	2006-06-15 18:26:00	493dbf3d8e98607bb3d13c068261f7de	67.42.19.112
357	376	Mike	Drainville	19 Squire Lane		Bellingham	MA	02019		1	I support this petition	raponevil@aol.com	0	0000-00-00 00:00:00	2006-08-19 20:48:22	8521a237eca1b3f6e975f41e40941d03	64.12.117.13
358	381	Lawrence	McGlynn	99 Chestnut Street		Weston	MA	02493	781-894-7123	1	We need to find a balance between history and diving.	Lmcglynn@concast.net	0	0000-00-00 00:00:00	2006-09-27 08:48:53	1598a5f66880d8d02c8e03cf7f5125e4	205.188.116.71
359	382	Serge	Saakov	112 Horizon Drive		Chittenango	NY	13037		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	serge_saakov@yahoo.com	0	0000-00-00 00:00:00	2006-09-27 15:40:30	739462051ba6ad1531d8908d6cf53c8d	165.89.84.86
360	391	vladislav	Mlch	398 Meridian st.		East Boston	MA	02128		1	I think Stellwagen Sanctuary is already highly regulated and any further regulations would make it effectively out of limit for general public.	mlch@verizon.net	0	0000-00-00 00:00:00	2006-11-27 12:01:25	540e274f0d1054c80b75ee5b8926929	72.72.25.15
361	396	Jim	Dobson	198 Tremont Street, Number 506		Boston	MA	02116	617-830-0852	0	I liked your site.	ci-Dobson3349@your-pop3.com	0	0000-00-00 00:00:00	2006-12-13 23:37:26	93601f7d3ca9e246f496fe6e80d93f8	206.225.94.28
362	1704	Michael	McCann	146 W Main St		Westborough	MA	01581		1	There is no need to restrict access with out just cause. If there is a location of unique public interest that needs to be protected this is reasonable. Restricting access to the entire area is not.	mikem@irobot.com	1	2007-02-27 11:38:37	2007-02-27 11:37:40	4c5af3b274da7bdeb298f8e10460be0	66.238.211.199
363	1705	Jackie	Cooper	403 Joseph Street		Rockville	MA	20850	301-838-5561	1	The proposed changes are not in the best interests of US taxpayers. They will allow public resources to be withheld from public usage for an indefinite time period.	jackiecooper@comcast.net	1	2007-02-27 12:20:01	2007-02-27 11:46:11	5e29fb228993f6ed3c91d339649b217f	69.255.224.252
364	1721	russell	smith	4810 6th street		brooklyn	MD	21225		0	I dont agree with the noaa plan for this area.	rsmith111@verizon.net	0	0000-00-00 00:00:00	2007-02-27 17:08:04	575a6093834a549a5693785df2809b	70.22.37.65
365	2949	Chris	Lavoie	101 Century St. Ext.		Medford	MA	02155	781-396-3788	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	crlavoie@att.com	1	2008-05-07 12:50:23	2008-05-07 12:49:16	745f712e9bde1007581b11f4db32aee	192.128.167.68
366	2868	mark	mark wilhyde	po box 2069		ocean shores	MA	98569		0	I live in ocean shores, Washington a recent storm brought up a fairly large piece of a ship its currently at the interpretive center here. I have many detailed pictures I just need some idea of who to send them to for possible dating and/or identification thanks mark wilhyde	hoode2000@hotmail.com	1	2008-01-20 20:49:27	2008-01-20 19:53:38	e28d6a23038ecd14d8d051cd24d31f41	64.184.168.150
367	2877	Thomas	Paradis	42 Chadwick way		weeksmills	ME	04358	207 445 2850	1	Commercial certified Tec certified	micmac33@fairpoint.net	1	2008-01-30 18:32:28	2008-01-30 13:43:14	978e5c505be9f094f5d4a13637fb109	66.243.216.106
368	2881	dana	kane	12 pleasant st	#7	auburn	MA	01501		1	I disagree with NOAA's proposed changes for the management of stellwagen bank	w3ldt@yahoo.com	1	2008-02-07 12:32:09	2008-02-07 12:29:01	57ceba4da14a66bacba4f88b4448aba	66.189.61.244
369	2886	Jeff	Goodreau	199 main st #2		Rindge	NH	03461	603-899-9811	1	Stellwagen Bank is paid for with tax dollars and we should have full access to it. Jeff	Mod410@aol.com	0	0000-00-00 00:00:00	2008-02-12 18:17:44	10917b729293b69b728f75097219b4e	64.12.117.198
370	2903	Matthew	Preye	51 Herman St		West Springfield	MA	01089		1	Please allow divers	Matt@weu.com	1	2008-02-29 11:11:18	2008-02-28 18:17:54	d1b0837de7fc84b17f6be51bfcdd7257	71.233.52.202
371	2778	Andrew	House	3184 Montebello Dr W		Colorado Springs	MA	80918		0	I disagree with NOAA's proposed changes concerning divers and wreck access	andrew.house@lycos.com	1	2007-09-03 07:30:28	2007-09-03 07:28:39	9407ae4a2435f0acdea0208dc61a8a8a	214.13.113.138
372	2925	nch	brey	187 partridge cove rd		lamoine	MA	04605		1	.	richard.brey@gmail.com	1	2008-03-24 13:32:27	2008-03-24 13:32:13	9ae5c68a29276ec53831a6745b6d535	68.56.64.180
373	2933	jonathan	iseson	26 hicks lane		Great Neck	NY	11024	516.672.1752	1	I agree	jonathandiseon@yahoo.com	1	2008-04-01 12:18:12	2008-04-01 12:03:42	a6a2c48f382631b84a251cb992e1a12f	69.74.227.206
374	2934	CHERYL	DORAN	902 VAUGHN AVE		TOMS RIVER	NJ	08753		1	I DISAGREE WITH ACCESS TO OCEAN SITES BEING LIMITED.....PLANS TO PROTECT BUT NOT DENY ACCESS SHOULD BE IN PLACE....THE OCEAN DOES ITS DAMAGE TO THESE WRECKS.....THEY HSOULD BE ENJOYED AND RESPECTED	CCCHERYLD@AOL.COM	0	0000-00-00 00:00:00	2008-04-01 12:28:58	b3d9a148df8f756d3559073388af9f66	64.12.117.131
375	2935	Szymon	Poplawski	10624 Gorman Rd		Laurel	MA	20723	3014041565	0	Please keep our shipwrecks open to all divers, these proposed restrictions are unnecessary.	dive2deep@comcast.net	1	2008-04-01 15:00:47	2008-04-01 14:59:43	174d3e15712fca88ef645c5794b4c76a	199.1.202.252
376	2936	Andrew	Ainslie	110 Westwood Plaza	Room B412	Los Angeles	CA	90095	310-904-2982	1	Please consider the negligible damage done to shipwrecks by divers before pointlessly regulating access to them.	andrew.ainslie@anderson.ucla.edu	1	2008-04-01 20:18:49	2008-04-01 20:17:38	c6a7e24c438757cd6279c15b3192c010	75.5.220.16

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377	2938	Michael	Carvalho	2168 Major Loring Way		Marietta	GA	30064	770-598-4514	1	I am a certified Divemaster with over 30 years of diving experience and practicing Environmental Attorney. This background forms the basis of my opinion that SCUBA Divers are uniquely qualified to be sentinals of the environment given our ability to directly observe ever changing oceanic conditions. SCUBA Diving should be encouraged and promoted as a non-threatening, eco-friendly opportunity to interact with the environment. I disagree with NOAA's proposed changes to the management of Stellwagon Bank, because it seeks to unfairly restrict the affective learning process that SCUBA diving provides. Thank you for your consideration. M.P. Carvalho, Esq. Marietta, GA	mpc@carvalholawfirm.com	1	2008-04-02 09:09:48	2008-04-02 09:08:25	59486383ec171d2dbfd8ec637a54d120	74.251.174.245
378	2939	Jeffrey	Gershen	48 Old Pound Road		Pound Ridge	NY	10576	914 879 4303	1	The NOAA proposal for the management of Stellwagen Bank is unacceptable.	Chinajeff1945@yahoo.com	1	2008-04-02 12:49:22	2008-04-02 12:41:08	9e51997cd5b2d82b74a94f0760452e3e	66.153.2.62
379	2940	Charles	Sellers	2064 Briarcliff Rd.	#104	Atlanta	GA	30329		1	Live Free or Die.	scooter@underseaadventures.com	1	2008-04-02 13:13:25	2008-04-02 13:12:08	a8836dca83af3004ceda197286c9f409	66.37.51.35
380	2943	Sunny	Longordo	7 Skyview Gardens Road		Lebanon	MA	08833		1	Access to these shipwrecks should remain open.	scubasunny22@yahoo.com	1	2008-04-07 21:24:03	2008-04-07 20:17:51	1cd6bc3169691b9ddd0a0bf73841bb48	71.1.169.119
381	2945	Nicolae	Sipitca	146 Boyce Street		Auburn	MA	01501		1	Diving is about FREEDOM	veriqster@gmail.com	1	2008-04-25 02:08:48	2008-04-25 01:45:13	7af3ce3b1379d447ae6736b27fab439c	68.114.90.182
382	2841	Ryan	Battles	21 Julia Ct.		Harwich	MA	02845	704-258-7756	1	Please keep responsible wreck diving alive in MA.	battles2a5@hotmail.com	1	2007-12-17 17:26:13	2007-12-17 17:25:48	d936c14225baab9a883c49ee36d09c70	24.74.71.137

Number	Unique ID	First Name	Last Name	Address 1	Address 2	City	State	Zip	Phone	Certified Diver 1=Yes, 0=No	Comments	Email Address	Email Confirmed	Confirmation Time	Signed Time	Confirmation Code	IP Address
383	2842	Faith	Ortins	3344 central Ave		Spring Valley	CA	91977	619-303-9540	1	My husband and I logged many dives on Stellwagen when we lived in MA and we disagree with the management plans as it pretains to divers. As someone who helped with the first Sanctuary website (supplied pictures and they were the only ones taken on Stellwagen) and the dives with Sylvia Earle, this is very disappointing.	faith@dui-online.com	1	2007-12-18 10:01:18	2007-12-17 18:30:52	a250ed9adb44df7b2e37a8c04c581f2a	207.88.199.162
384	2843	Joel	Bertuzzi	15 Briarcliff Rd.		Longmeadow	MA	01106	413-567-3524	0	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	joel_bertuzzi@aspensquare.com	1	2007-12-18 07:36:51	2007-12-17 18:37:39	79d124a2b556f124d2ef29c45825de44	205.188.117.131
385	2844	Mark	Ostojich	442 C Brick Boulevard		Brick	NJ	08723		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	mostojich@comcast.net	1	2007-12-17 19:03:37	2007-12-17 19:03:02	b29b0e0065e083031505d126b6f5a7a8	76.116.125.152
386	2845	James	Lapenta	615 McNary Ave Apt 2		Canonsburg	PA	15317		1	I may not get to dive there in the near future but if the bureaucrats can do it there they'll start screwing us out of other sites.	jimlap212@comcast.net	1	2007-12-18 16:28:06	2007-12-17 19:52:27	2ac49fb34d6dd5cb4acd6a819e3e6be	76.120.182.41
387	2846	H. Bradford	Rose	Box 52	99 B Hamilton St	Belchertown	MA	01007		1	I dive and I vote!!	hbrose@charter.net	1	2007-12-17 22:37:10	2007-12-17 21:29:47	f45fa1fb79bf972d19b3d847ccc73d88	68.118.242.215
388	2847	Karl	Kelso	49 Leslie Lane		Smithtown	NY	11787		1	I highly disagree with NOAA's proposed changes for the management of Stellwagen Bank.	kkelso@optonline.net	1	2007-12-17 22:25:20	2007-12-17 22:20:05	1d24b1d34be9f961a0c5d2d698508e7d	24.184.72.184
389	2848	Drew	Gore	1314 Pollys Ln		Bainbridge Island	WA	98110		1	"I disagree with NOAA's proposed changes for the management of Stellwagen Bank." The oceans and airwaves belong to the citizens of the respective country, not the government or private organizations.	drewgore@gmail.com	1	2007-12-24 00:11:10	2007-12-23 13:39:01	eaaf8972aaf6b05832aec126c12322ac	71.216.8.121
390	2850	Todd	Baldi	1391 Waller Street		San Francisco	CA	94117		1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. What is the point of NOAA "preserving" this site and others (notably the USS Monitor) if no American citizen can have reasonable access to them?	sandiegoaes@yahoo.com	1	2007-12-27 10:48:52	2007-12-26 18:52:10	ee2619d45222b27d8312ba162f1299d9	65.200.194.59
391	2379	Timothy	Kesner	151 Naticook Rd		Merrimack	NH	03054	603-886-0504	1	I agree in full with petition to allow divers access to wrecks with the Stellwagen Bank Marine Sanctuary.	timothykesner@comcast.net	1	2007-05-23 05:11:47	2007-05-22 15:14:17	17cb407918ae3a2c5077736ebd4d6377	63.164.202.130
392	2382	Robert	Foster	555 Stevens St		Lowell	MA	01851	978-758-5658	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank. These sites are in a state of rapid decay and should be explored and enjoyed while they still exist.	bert@multitask-media.com	1	2007-05-23 23:06:04	2007-05-23 23:03:52	cab89d0c64fa722aeb6a5605e9f692	24.63.48.26
393	2421	michael	hayes	19 perkins st		peabody	MA	01960		1	these sites will eventually be non exsistant do to decay and the harsh environment in which they lie.non divers are most likely unaware of thier exsistance. restricting diving on them would only ensure no one gets to enjoy or research these historical locations.	hazymh@yahoo.com	1	2007-05-28 13:13:56	2007-05-28 08:50:22	8ea55da4208e1c3b273ee3b16472457d	68.167.98.22
394	691	Peter	Nichol	107 Farmstead RD APT 35		Southington CT	CT	06489	617-480-9147	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank." I enjoy diving and the "no touch" diving we do as little to zero effect on dive locations/wrecks. We dive because we love the ocean and enjoy history. We dive because we'd like to see some of that history.	pnichol@centricinternational.com	1	2007-01-08 17:29:55	2007-01-08 17:25:47	25e53644dc9d2ec3deb4a46faf1d592a	68.9.82.177
395	772	Matthew	Taglienti	3640 Mountain drive		Brookfield	WI	53045	262.781.5564	1	I disagree with NOAA's proposed changes for the management of Stellwagen Bank.	matamyltag@aol.com	0	0000-00-00 00:00:00	2007-01-17 17:11:52	f537308ab8226cab368aedf56a74da5	70.94.29.204
396	2079	James	Powers	24 Washington Street		Groveland	MA	01834-1131	978-372-3349	1	No diving restrictions for Stellwagen Banks.	jmyvettepowers@comcast.net	1	2007-04-01 06:52:04	2007-04-01 06:31:37	58ee852aa662a4dac311f74dc930e24	24.128.76.7
397	2096	Irving	Meredith	3 Blake Road		Moultonborough	NH	03254		1	I think this way too restrictive on divers.	lke@devthink.com	1	2007-04-04 10:06:04	2007-04-04 09:58:28	24c2c55b7c9b3003796c04582e143733	71.255.139.247
398	2140	James	Vaughn	2707 Fairlawn Street		Temple Hills	MD	20748	703-477-3964	1	I would hate to see this area closed, it has so much to experiance. Would we close Yosemite? Or Yellowstone? Why limit visitation access to this site?	james.vaughn6@verizon.net	1	2007-04-11 15:32:06	2007-04-11 15:29:29	e86057e7138e317552b19644d354ec65	208.255.162.18
399	2636	Sally	Kraus	198 Tremont Street, Number 506		Boston	MA	02116	781-658-2687	1	Your site is very useful.	cxl.skraus0187@real-cheap-email.com	0	0000-00-00 00:00:00	2007-06-26 01:13:06	0ad8a74eb80ca851ae05545d5a954c3b	66.180.169.35