

March 21, 2012

Craig MacDonald
Superintendent
Stellwagen Bank National Marine Sanctuary
Scituate, MA

Re: Sanctuary Ecological Research Area (SERA) proposal

Dear Craig;

As you know, at our February 16, 2012 meeting, many SAC members expressed serious concerns about the lack of progress and current status of the sanctuary ecological research area (SERA) proposal. After thorough deliberation, the SAC voted nearly unanimously that you convey to all appropriate colleagues in NOAA and the Department of Commerce, our advice that the SERA proposal should officially be submitted to the New England Fisheries Management Council for its consideration as part of the Omnibus Habitat Amendment.

Members of the SAC highlighted the facts that: 1) the SERA is a key element to implement the current Sanctuary Management Plan - a document whose recommendations were reached by consensus among the representatives of the SAC, consulting with a large number and wide range of stakeholders, and thoroughly vetted and approved by all departments within NOAA; 2) the SERA, the culmination of over 12 years of discussions, input from SAC members and others and with numerous peer reviews, is the product of and an outstanding example of some of the best use of scientific data and technical information that SBNMS has produced.

SERA's excellent scientific resources would only enhance the NEFMC's work on the Omnibus Habitat Amendment. The SAC is extremely concerned that if NOAA does not promptly submit SERA as part of the Omnibus Habitat Amendment, then 1) NEFMC's planning and decision-making, currently underway within the NEFMC, will not benefit from the enormous effort and resources behind SERA; and 2) the Sanctuary will be handicapped in its ability to implement its management plan. The NEFMC Omnibus Habitat Amendment provides the best possible forum for entertaining the SERA concept as part of the overall Omnibus process and utilizing its excellent scientific reasoning.

To now sit on the sidelines would be a huge lost opportunity and it would especially frustrate Sanctuary constituents should the SERA be considered by the NEFMC at a later date once the Omnibus Habitat Amendment is complete; not to mention becoming a discouraging outcome for the Sanctuary and all of the citizens and colleagues who have contributed so much support and time and energy to the mission of SBNMS.

Lastly, SAC members understand the NOAA prescribed process whereby SAC and SBNMS do not make submittals directly to NEFMC; but rather send them through the NOAA chain of command. We have respected that process, and have followed it in good faith, but remain frustrated that despite wide-spread support throughout NOAA, SERA is stalled.

Therefore, as Chair of the SAC, I ask you as Superintendent once again to immediately convey to the national office and others in DC, the SAC's strongest recommendation to submit the SERA proposal to the NEFMC for inclusion in the Omnibus Habitat Amendment without further delay. As the minutes will show, this request is the result of a 19 to 1 vote by the SAC at our February, 2012 meeting with 1 abstention.

Sincerely,

A handwritten signature in cursive script that reads "Richard Delaney". The signature is written in dark ink and is positioned above the typed name.

Richard F. Delaney
Chair
SBNMS Sanctuary Advisory Committee