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Stellwagen Bank National Marine Sanctuary

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August 5, 2013

Nicole R. LeBoeuf
Chief, Marine Mammal and Sea Turtle
Conservation Division
Office of Protected Resources, NMFS
1315 East-West Highway
Silver Spring, MD 20910

RE: Proposed Rule to Eliminate the Expiration Date Contained in the Final Rule to Reduce the Threat of Ship Collisions with North Atlantic Right Whales.

Dear Ms. LeBoeuf,

The Stellwagen Bank National Marine Sanctuary Advisory Council strongly supports the above referenced proposed rule. Stellwagen Bank National Marine Sanctuary (SBNMS) and the proximate Right Whale Critical Habitat of Cape Cod Bay provide important feeding grounds for the North Atlantic Right Whale; survey data show that at certain times in the year, more than half of the known population of the North Atlantic feed and socialize in the area.

The SBNMS and adjacent areas experience significant amounts of vessel traffic including major shipping lanes, subjecting the right whale, an endangered species believed close to extinction, to great risk. Fortunately, the current speed restrictions have helped reduce the occurrence and severity of vessel strikes as demonstrated by recent studies conducted by NOAA and independent research organizations.

SBNMS Sanctuary Advisory Council, therefore, requests that the "sunset clause" be removed from the regulation as proposed to ensure that this critically endangered population recovers.

The SAC also requests that a provision be added to the regulations to require periodic assessments of the effectiveness of the regulation in order to evaluate potential improvements including alteration of seasonal restrictions and management areas. The goal of any changes would be to retain or increase protection to the North Atlantic right whale.

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Thank you for this opportunity to comment on a matter that is a top management priority for the Stellwagen Bank National Marine Sanctuary.

Sincerely,



Chair, SBNMS Sanctuary Advisory Council

"The opinions and findings of this letter do not necessarily reflect the position of the Sanctuary and the National Oceanic and Administrative Administration."