

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: Re: Your Request
Date: 10/08/2008 1:54:08 PM

----- Original Message -----

Subject: Re: Your Request
Date: Fri, 27 Jun 2008 10:21:51 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Smith, Eric <Eric.Smith@ct.gov>
References: <323299F9D5554341B51DF09D288237607E937D@DOIT-EX401.exec.ds.state.ct.us>

Eric - Thank you very much for this information. Nothing insulting here, and I greatly appreciate your taking the time to provide this clarification, particularly in face of your pending retirement. It was good meeting you again at the Mystic Aquarium. Hope our paths cross in the future.

Best wishes, Craig

Smith, Eric wrote:

> Good afternoon, Craig:
>
> To your request last week (what words I felt were somewhat
> inflammatory...), here's a quick summary, just from the Executive Summary:
>
> Page 1, Column 2, bottom of page: "...fishing -- especially
> commercial fishing -- impacts and pressures every resource state..."
> This is pretty broad and pejorative.
>
> Page 2, Column 1, top of page: "...every square kilometer... is
> physically disturbed by fishing." I suspect that this is not true.
> The figure you showed suggested, symbolically, that every square inch
> was covered but that's the problem with small maps and large symbols.
> Also, if I recall correctly, that figure aggregated the "hits" over a
> 5-year period, not annually, all the more reason to think that some
> areas get fished frequently and others do not get fished at all (as
> happens everywhere else in the ocean).
>
> Just below: "...all of the big old growth individuals..." Frankly
> (and hopefully without being inflammatory myself...), a fishery
> resource is not a redwood forest. Old growth in this context (perhaps
> only in my view but I doubt it) seems calculated to inspire an
> anti-fishing sentiment by offering up an analogy to old growth
> logging. Regarding the folks that have captured the public's
> attention with statements like "...trawling the ocean is like clear
> cutting a forest...", I've always felt such statements were rather
> shameful when made by individual advocate/scientists. I didn't expect
> to see such statements in a NOAA publication. This is not to suggest
> that growth overfishing isn't a problem worth solving. However, as
> the fishing mortality rates of exploited populations decline, fish
> will quickly grow to larger sizes (witness scup and summer flounder in

> the Mid-Atlantic). This is, of course, a fundamental difference
> between fisheries and forests.
>
> Finally (same column): "Fishing removes 3,200 metric tons of herring
> from the sanctuary each year on average, an amount sufficient to
> potentially deplete the forage base for whales and other sanctuary
> wildlife." Again, I think this is entirely presumptuous. The fishing
> mortality rate on Atlantic herring is well below Fmsy and the biomass
> is well above Bmsy. Allowable catches are held well below the levels
> that would allow the fishery to reach those limits. By any
> definition, this is a well-managed resource, providing public benefits
> and opportunities in bait and food fisheries, and ecological services
> for piscivorous marine mammals, seabirds and fish species. Therefore,
> I do not see the basis for the statement "...an amount sufficient to
> potentially deplete the forage base..." What is a bone of contention
> is that a lot of different folks don't think much of mid-water and
> pair trawling for sea herring. That's a societal conflict that will
> work itself out, in time. Your report seems to have been co-opted by
> those folks into disparaging a sustainably-managed fishery.
>
> Anyway, as I said last week, my real concern is that the good elements
> of your message will get lost in the battles over the inflammatory
> parts. Frankly, as I first read the summary, I could not figure out
> why the editorial process did not "round off the sharp edges?"
>
> I hope this doesn't insult you; that's not my intent. I'm traveling
> "at the speed of light" these past few days so I'm not necessarily
> properly sanitizing everything I say or write but, since you asked,
> you have the pleasure of receiving what will likely be my last comment
> on a technical matter.
>
> Good luck!
>
> Eric Smith

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: public comments
Date: 10/06/2008 2:32:33 PM

----- Original Message -----

Subject: pulic comments
Date: Fri, 03 Oct 2008 14:13:39 -0700 (PDT)
From: aija briga
Reply-To: aijabriga@yahoo.com
To: Craig.MacDonald@noaa.gov

Dear Craig, 1.am in support of a ban on sand lance. 2.nursing mother and calves as well as logging whales should have special consideration with at least some time line. Irene Briga Marine Mammal/ Endangered Species Observer

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: RE: WDCS/Nantucket Soundkeeper DMP comments
Date: 10/06/2008 2:23:47 PM

----- Original Message -----

Subject: RE: WDCS/Nantucket Soundkeeper DMP comments

Date: Fri, 03 Oct 2008 15:16:32 -0400

From: Judith Pederson

To: 'Craig Macdonald'

CC: 'Mason Weinrich' , 'Sharon Young'

, 'Priscilla Brooks' , 'Susan Farady'

, 'Nathalie Ward Ward'

, 'Peter Auster Auster'

, 'Rich Delaney' ,

Gib5@charter.net, 'Judi Pederson Pederson'

jen@stellwagenalive.org, 'Regina Asmutis-Silvia'

Greeting Craig:

This email is short because I did not have the time to review in detail and comment on details within the Management Plan.

I commend you and the staff for your efforts in bringing this to be public. Unfortunately, it has not tackled the difficult issues. The action plans are reasonable in most cases, but cost money to implement. There is not indication of what is gained from implementing a particular plan - What does characterization of contaminants in Stellwagen Bank at \$55 K (more if you add endocrine disrupters) for 5 years do to advance protection of the resources? How does this particular issue measure to other action plan items. What is the greatest concern of the public and what are the critical (and often difficult) items that would address these.

I could choose one or more of the first three items, whale watch program, maritime heritage program and forage base management and as the same question - what does focusing on these in the early years gain the sanctuary in terms of its highest priorities.

Quite honestly, I thought that Gib had identified the issues by focusing on the need for identifying no-action versus actions and looking at the impacts to the resources, the stakeholders, and the vision and goals of the sanctuaries. To produce a document that lays out alternative actions from all the various action plans is not an easy task for staff busy with full time jobs, but it would have served as a basis for discussion and a way forward.

Two of the management continuums the whale watch program and forage base

management are not one of the major action plans, and habitat zoning and compatibility analysis are lumped together. In quickly looking at the index, I could not find what was intended for each of the years.

I apologize for not being more specific and providing some thoughts but I have run out of time.

Cheers,
Judy
Judith Pederson, Ph.D.
MIT Sea Grant College Program
MITSG Center for Coastal Resources
292 Main Street, E38-300
Cambridge, Massachusetts 02139
tel. 617-252-1741 fax 617-252-1615
<http://massbay.mit.edu>; <http://seagrant.mit.edu/>

From: sbplan <sbplan@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: Re: Stellwagen Bank National Marine Draft Management Plan and EAComments
Date: 10/06/2008 11:43:39 AM

ddow@cape.com wrote: The Massachusetts Chapter- Sierra Club will submit separate comments on marine mammal concerns than those submitted by the Cape Cod & the Islands Group on fisheries & habitat issues

----- Original Message -----
Subject: Fwd: Stellwagen Bank National Marine Draft Management Plan and EA Comments
From: "David Dow" <ddow@cape.com>
Date: Thu, October 2, 2008 7:16 am
To: sbplan@noaa.gov
Cc: "David Dow" <ddow@cape.com>
"billie bates" <bcbts@yahoo.com>
"R Philip Dowds" <rpdowds@comcast.net>
"James McCaffrey" <Director@sierraclubmass.org>
"Jay Miller" <jmiller123@cox.net>
"Bob Murphy" <Murphydalzell@aol.com>

Comments on Stellwagen Bank National Marine Sanctuary's Draft Management Plan and Environmental Assessment (MP&EA) :

The Cape and the Islands Group- Sierra Club (CC&I) agrees with the assessment of the Stellwagen Bank National Marine Sanctuary's (SBNMS) draft Management Plan and Environmental Assessment that some of the sanctuaries key biological resources are in trouble from human activities (especially fishing, ship traffic, whale watching and climate change). Thus our comments will concentrate on the threats to fish populations (target and non-target)/ marine mammals (especially North Atlantic right whales) and their supporting habitats. Portions of the SBNMS are critical habitat for the North Atlantic right whale and other whales listed under the Endangered Species Act (ESA). Many of these whale populations are listed as strategic stocks under the Marine Mammal Protection Act (MMPA), so that human impacts are a pervasive problem for recovery of many whale species. Thus it is critical to protect the pelagic habitats that these whales occupy, especially zooplankton prey (*Calanus finmarchicus*) populations for right whales (and other planktivores) and Atlantic herring for humpback whales (and other piscivores). Forage prey species, such as Atlantic herring, are important for many fish populations, marine mammals and seabirds, so that we have concerns about the directed fishery for this species in the emerging Fishery Management Plan (FMP).

Many demersal fish populations depend upon benthic essential fish habitat (EFH) for food, shelter and reproduction, so that we have have a concern about the impacts of mobile fishing gear on EFH. In addition, there is excess commercial and recreational harvesting of many of the target fish/shellfish species; bycatch of non-target species which diminishes the ecological integrity of the wider ecosystem and incidental mortality of marine mammals and sea turtles by static

fishing gear. The CC&I comments will focus on this topic, while the Massachusetts Chapter- Sierra Club will submit separate comments on protected species issues, especially North Atlantic right whale protection. It is possible that the Sierra Club's national Marine Wildlife & Habitat Activist Team will submit comments on protecting whales as well.

The CC&I proposes some studies to examine the effects of mobile fishing gear on benthic EFH and approaches for reducing the impacts of static fishing gear, ship strikes and whale watching on whale populations. We feel that the National Oceanic and Atmospheric Administration (NOAA) needs to better coordinate the role of NOAA Fisheries in managing fish/shellfish and protected species (marine mammals and sea turtles) with the role of the National Ocean Service (NOS) in protecting the biological resources within the SBNMS which have been impacted by human activities for which NOAA has management responsibility (Interagency Coordination Action Plan). Given the move towards an ecosystem approach to management (EAM) and the designation of spatial management zones with special regulations as part of this process, we feel that the SBNMS needs to fall in this category if it is to meet its mandate to protect the living marine, protected and natural trust resources within its boundaries. We are disappointed that there is no action plan to address natural trust resources (i.e. seabirds at al.) within the Management Plan, even though they are mentioned in the Environmental Assessment. Many of our members have strong interests in conserving shorebirds and seabirds, so that we would like to see greater acknowledgement of this issue in the document. An ocean zoning approach is needed within the SBNMS in order to allow compatible human activities with the protection of the biological resources, but the Compatibility Determination Action Plan provides no information on this topic. We stand ready to help in elaborating this action plan.

Effects of Fishing on the Biotic Resources and Habitats within the SBNMS:

The Cape Cod and the Islands Group- Sierra Club agrees with the conclusion in the draft SBNMS draft Management Plan and Environmental Assessment (MP&EA) that the direct/indirect effects of fisheries harvesting have impacted the biotic resources and habitats within the sanctuary's boundaries. Even though the Sierra Club supported the original compromise that allowed commercial and recreational fishing within the newly designated sanctuary, we feel that in light of its adverse impacts that some constraints need to be placed on where this activity occurs and that the overall harvest level needs to be reduced. We envision using the SBNMS and adjacent western Gulf of Maine Closed Area (WGoM CA) as test areas to examine the effects of mobile fishing gear on Essential Fish Habitat (EFH) and the role of incidental catch of non-target fish species, plus the static fishing gear impacts on bycatch of protected species (marine mammals)/natural trust resources (seabirds). This proposal would require cooperation between NOAA Fisheries and the National Ocean Service (which oversees the SBNMS) which haven't always shared the same management visions for this special place. This section will focus on the direct and indirect effects of fisheries harvesting on the target species, their prey and EFH.

We advocate the use of a significant portion of the WGoM CA (that overlaps boundaries of SBNMS) as a no take Marine Protected Area (MPA). This MPA would serve as the natural baseline to examine fishing impacts from zoned fishing gear areas (mobile and static) within the

SBNMS, where different areas would be set aside for different types of commercial and recreational fishing activities. Using realistically sized zones for different fishing gears within the SBNMS and comparing this to the WGOM CA MPA would allow the National Oceanic and Atmospheric Administration (NOAA) to develop management regulations that would promote sustainable fisheries, while at the same time protecting the biotic resources and habitats (pelagic and benthic) within the SBNMS. This approach is consistent with the Massachusetts Chapter's Sustainable Fisheries Policy and that developed at the national level by the Marine Wildlife & Habitat Activist Team. Our Group helped develop the Chapter's Sustainable Fisheries Policy in the mid- 1990's, so that we have had a long term interest in this issue. This would be consistent with the recent call (Grafton et al., 2008) by fisheries scientists to move towards sustainability in managing fisheries. The SBNMS needs to ensure biodiversity, ecosystem integrity, societal amenities and sustainable uses of biotic resources which will require changes in governance and management institutions. There needs to be better balance between the protection of public resources and private benefits within the SBNMS boundaries.

This suggestion would support concepts advanced in the MP&EA Compatibility and Ecosystem Protection Action Plans. The Compatibility Action Plan would greatly benefit from the applied research/ecosystem monitoring/modelling concept briefly described above for a new ocean zoning approach. All of these scientific components would be required to support an adaptive management program required to allow sustainable fishing, while protecting the the SBNMS's biotic resources and habitats. The Ecosystem Protection Action Plan addresses ecosystem-based management (EbM) and ecosystem alteration which would require cooperation by NOAA Fisheries and NOAA NOS. NOAA Fisheries has management responsibilities for fisheries harvesting; protection of marine mammals and sea turtles and natural trust resources (sea birds). The Canadian Eastern Scotian Shelf Integrated Management (ESSIM) plan provides a good example of the required framework (Rutherford et al., 2005) that should be pursued within the GoM/SBNMS ecosystem between different components of NOAA and other federal/state management entities.

The Northeast Fisheries Science Center's (NEFSC) fishery independent Bottom Trawl Survey (BTS) with its fish stomach data base provide a useful long term database on the distribution/abundance of target fish species and their prey (finfish and invertebrates). There is no long term monitoring program for the benthic components of EFH (other than prey species), while the ecosystem monitoring program for pelagic habitats is much more limited than its demersal fish counterpart. More process oriented research is required to link fish production to the functional properties of pelagic and benthic EFH. There is a need for the SBNMS management and that at the NOAA Fisheries Northeast Regional Office (NERO) to better coordinate their scientific monitoring/research programs with management objectives to protect and conserve biological diversity and habitats both within the SBNMS and in the wider Gulf of Maine/Georges Bank ecosystem (GoM/GB). NOAA needs to develop an integrated ecosystem assessment of the wider GoM system, similar to the one done on the Eastern Scotian Shelf to support ESSIM (Choi et al., 2005). NOAA needs to view the SBNMS as a component of the wider GoM/GB seascape and manage this from a landscape ecological framework, rather than by mandates based upon the MSFCMA (Magnuson-Stevens Fishery Conservation and Management Act), ESA (Endangered Species Act), MMPA (Marine Mammal Protection Act), etc. This would entail better coordination of research and management, plus

a more effective constituent involvement program to resolve potential multi-user, multi-sector conflicts.

Additional monitoring is required on the distribution/abundance of sea birds and their pelagic habitat requirements. This would require cooperation between NOAA Fisheries and NOS. Since forage fish species (menhaden, Atlantic herring, Atlantic mackerel, sand eels, etc.) are important in the bottom up trophic coupling between the plankton and fish, marine mammals and sea birds, this component would benefit from a more comprehensive ecosystem-based monitoring program; associated process oriented research and modelling (Read and Brownstein, 2003). Academic scientists and those within NOAA Fisheries have developed network modelling approaches (Ecopath and EcoNetwrk) that allow one to incorporate bottom up trophic components into the management advice provided in the stock assessment process. Multispecies VPAs allow predator-prey interactions to be incorporated into management advice. New modeling approaches need to be developed to incorporate advice on the impacts of fisheries harvesting on EFH and biological diversity of other components of the marine ecosystem. The New England Fishery Management Council (NEFMC) development of the second Omnibus Habitat Amendment for the Council's 27 managed species offers an opportunity to examine the effects of mobile fishing gear on EFH and direct/indirect impacts of fishing on biodiversity (from genetics to populations/communities).

The SBNMS needs to operationally define "ecosystem integrity" and their "compatibility" guidelines in order to develop an adaptive management approach for protecting the biotic resources and habitat within the sanctuary's boundaries. This implies that NOAA Fisheries and NOS have to cooperate more efficiently than has been the case in the past in order to have an integrated management effort both within the sanctuary and in the wider GoM/GB ecosystem (since what happens outside the sanctuary provides the context for what occurs inside). Sometimes conflicts arise between the mandates for managing the SBNMS and those under which NOAA Fisheries operates. Since NOAA Fisheries is moving towards an ecosystem approach for management (EAM) which features place-based rule making, it may be necessary to consider separate rules for the SBNMS to encompass its mandates under the NMS Act. As mentioned earlier the Canadian ESSIM initiative can be used for lessons learned on how to pursue an integrated management approach for multisector uses and coordinate the activities of diverse constituents (Choi et al., 2005; Rutherford et al., 2005). It took a many years to implement ESSIM, so that in our view NOAA has a long way to go for implementing an EAM for the SBNMS and the surrounding GoM ecosystem.

One final point is that climate change in the marine environment from human activities is likely to exacerbate the future effects associated with fisheries harvesting. Given the fish community changes in Narragansett Bay (Collie et al., 2008), climate change (natural and human-induced) effects have become apparent for inshore ecosystems. It is likely that the distribution of forage fish species will show either seasonal or annual shifts in the foci of distribution/abundance on the Northeast Continental Shelf, which implies that new efforts will be required in monitoring, process oriented research and modeling to understand how climate change interacts with the direct/indirect impacts from fishing. These changes may exacerbate the fisheries harvesting induced regime shift in the northwest Atlantic ecosystem from demersal to pelagic-dominated fish community plus increased invertebrates (Choi et al., 2005). This might

also include the need to better understand the effects of eutrophication in coastal waters and the MWRA (Massachusetts Water Resources Authority) outfall pipe's water quality impacts on the SBNMS biotic resources and habitat. The SBNMS MP&EA provides a good background on the multiple human threats facing the sanctuary resources and the Action Plans offer some solutions.

The SBNMS lies along the gradient between coastal waters, continental shelf and off shelf water masses and these all interact to influence what happens with the sanctuary's boundaries. This has to be viewed as an integrated physical, chemical and biological system from both the science side and the resultant management actions. The two ocean commissions (Pew and U.S.) emphasized this need, but the federal government has not implemented this perspective either scientifically or in management. The Sierra Club favors using regional coastal commissions to integrate local/state/federal management actions. Potential management models include the California Commission or Gulf of Maine Council on the Marine Environment. On the scientific side the Gulf of Maine Ocean Observing System (GoMOOS) might offer a useful model. We face a future in which multiple human stressors will impact the SBNMS resources and these will emanate from local, state and federal jurisdictional units. Since all three levels of government face severe constraints on financial and personnel resources, there is a need to prioritize the activities required to address the problems highlighted in the SBNMS MP&EA. The CC&I Group feels that this document has made a good start in this prioritization.

Bibliography:

Choi, J.S., K.T. Frank, B.D. Petrie, and W.G. Leggett. 2005. Integrated assessment of a large marine ecosystem: a case study of the devolution of the eastern Scotian Shelf, Canada. *Oceanography & Marine Biology Annu. Rev.* 43: 47-67.

Collie, J.S., A.D. Wood, and H.P. Jeffries. 2008. Long-term shifts in the species composition of a coastal fish community. *Can. J. Fish. Aquat. Sci.* 65: 1352-1365.

Grafton, R.Q., R. Hilborn, et al. 2008. Positioning fisheries in a changing world. *Marine Policy* 32: 630-634.

Read, A.J. and C.R. Brownstein. 2003. Considering other consumers: Fisheries, predators, and Atlantic herring in the Gulf of Maine. *Ecology & Society* 7 (1); art. 2; 11 p.

Rutherford, R.J., G.J. Herbert and S.S. Coffen-Smout. 2005. Integrated ocean management and the collaborative planning process: the Eastern Scotian Shelf Integrated Management (ESSIM) initiative. *Marine Policy* 29: 75-83

Thanks for considering our comments and proposed suggestions for improvement in this document.

Dr. David Dow
Treasurer, Cape Cod & the Islands Group- Sierra Club
18 Treetop Lane
East Falmouth, Ma. 02536-4814
Phone: 508-540-7142
Email: ddow@cape.com

Comments on Stellwagen Bank National Marine Sanctuary's Draft Management Plan and Environmental Assessment (MP&EA):

The Cape and the Islands Group- Sierra Club (CC&I) agrees with the assessment of the Stellwagen Bank National Marine Sanctuary's (SBNMS) draft Management Plan and Environmental Assessment that some of the sanctuaries key biological resources are in trouble from human activities (especially fishing, ship traffic, whale watching and climate change). Thus our comments will concentrate on the threats to fish populations (target and non-target)/ marine mammals (especially North Atlantic right whales) and their supporting habitats. Portions of the SBNMS are critical habitat for the North Atlantic right whale and other whales listed under the Endangered Species Act (ESA). Many of these whale populations are listed as strategic stocks under the Marine Mammal Protection Act (MMPA), so that human impacts are a pervasive problem for recovery of many whale species. Thus it is critical to protect the pelagic habitats that these whales occupy, especially zooplankton prey (*Calanus finmarchicus*) populations for right whales (and other planktivores) and Atlantic herring for humpback whales (and other piscivores). Forage prey species, such as Atlantic herring, are important for many fish populations, marine mammals and seabirds, so that we have concerns about the directed fishery for this species in the emerging Fishery Management Plan (FMP).

Many demersal fish populations depend upon benthic essential fish habitat (EFH) for food, shelter and reproduction, so that we have a concern about the impacts of mobile fishing gear on EFH. In addition, there is excess commercial and recreational harvesting of many of the target fish/shellfish species; bycatch of non-target species which diminishes the ecological integrity of the wider ecosystem and incidental mortality of marine mammals and sea turtles by static fishing gear. The CC&I comments will focus on this topic, while the Massachusetts Chapter- Sierra Club will submit separate comments on protected species issues, especially North Atlantic right whale protection. It is possible that the Sierra Club's national Marine Wildlife & Habitat Activist Team will submit comments on protecting whales as well.

The CC&I proposes some studies to examine the effects of mobile fishing gear on benthic EFH and approaches for reducing the impacts of static fishing gear, ship strikes and whale watching on whale populations. We feel that the National Oceanic and Atmospheric Administration (NOAA) needs to better coordinate the role of NOAA Fisheries in managing fish/shellfish and protected species (marine mammals and sea turtles) with the role of the National Ocean Service (NOS) in protecting the biological resources within the SBNMS which have been impacted by human activities for which NOAA has management responsibility (Interagency Coordination Action Plan). Given the move towards an ecosystem approach to management (EAM) and the designation of spatial management zones with special regulations as part of this process, we feel that the SBNMS needs to fall in this category if it is to meet its mandate to protect the living marine, protected and natural trust resources within its boundaries. We are disappointed that there is no action plan to address natural trust resources (i.e. seabirds at al.) within the Management Plan, even though they are mentioned in the Environmental Assessment. Many of our members have strong interests in conserving shorebirds and seabirds, so that we would like to see greater acknowledgement of this issue in the document. An ocean zoning approach is needed within the SBNMS in order to allow compatible human activities with the the protection of the biological resources, but the Compatibility Determination Action Plan provides no information on this topic. We stand ready to help in elaborating this action plan.

Effects of Fishing on the Biotic Resources and Habitats within the SBNMS:

The Cape Cod and the Islands Group- Sierra Club agrees with the conclusion in the draft SBNMS draft Management Plan and Environmental Assessment (MP&EA) that the direct/indirect effects of fisheries harvesting have impacted the biotic resources and habitats within the sanctuary's boundaries. Even though the Sierra Club supported the original compromise that allowed commercial and recreational fishing within the newly designated sanctuary, we feel that in light of its adverse impacts that some constraints need to be placed on where this activity occurs and that the overall harvest level needs to be reduced. We envision using the SBNMS and adjacent western Gulf of Maine Closed Area (WGoM CA) as test areas to examine the effects of mobile fishing gear on Essential Fish Habitat (EFH) and the role of incidental catch of non-target fish species, plus the static fishing gear impacts on bycatch of protected species (marine mammals)/natural trust resources (seabirds). This proposal would require cooperation between NOAA Fisheries and the National Ocean Service (which oversees the SBNMS) which haven't always shared the same management visions for this special place. This section will focus on the direct and indirect effects of fisheries harvesting on the target species, their prey and EFH.

We advocate the use of a significant portion of the WGoM CA (that overlaps boundaries of SBNMS) as a no take Marine Protected Area (MPA). This MPA would serve as the natural baseline to examine fishing impacts from zoned fishing gear areas (mobile and static) within the SBNMS, where different areas would be set aside for different types of commercial and recreational fishing activities. Using realistically sized zones for different fishing gears within the SBNMS and comparing this to the WGOM CA MPA would allow the National Oceanic and Atmospheric Administration (NOAA) to develop management regulations that would promote sustainable fisheries, while at the same time protecting the biotic resources and habitats (pelagic and benthic) within the SBNMS. This approach is consistent with the Massachusetts Chapter's Sustainable Fisheries Policy and that developed at the national level by the Marine Wildlife & Habitat Activist Team. Our Group helped develop the Chapter's Sustainable Fisheries Policy in the mid- 1990's, so that we have had a long term interest in this issue. This would be consistent with the recent call (Grafton et al., 2008) by fisheries scientists to move towards sustainability in managing fisheries. The SBNMS needs to ensure biodiversity, ecosystem integrity, societal amenities and sustainable uses of biotic resources which will require changes in governance and management institutions. There needs to be better balance between the protection of public resources and private benefits within the SBNMS boundaries.

This suggestion would support concepts advanced in the MP&EA Compatibility and Ecosystem Protection Action Plans. The Compatibility Action Plan would greatly benefit from the applied research/ecosystem monitoring/modelling concept briefly described above for a new ocean zoning approach. All of these scientific components would be required to support an adaptive management program required to allow sustainable fishing, while protecting the the SBNMS's biotic resources and habitats. The Ecosystem Protection Action Plan addresses ecosystem-based management (EbM) and ecosystem alteration which would require cooperation by NOAA Fisheries and NOAA NOS. NOAA Fisheries has management responsibilities for fisheries harvesting; protection of marine mammals and sea turtles and natural trust resources (sea birds). The Canadian Eastern Scotian Shelf Integrated Management (ESSIM) plan provides a good example of the required framework (Rutherford et al., 2005) that should be pursued within the GoM/SBNMS ecosystem between different components of NOAA and other federal/state management entities.

The Northeast Fisheries Science Center's (NEFSC) fishery independent Bottom Trawl Survey (BTS) with its fish stomach data base provide a useful long term database on the distribution/abundance of target fish species and their prey (finfish and invertebrates). There is no long term monitoring program for the benthic components of EFH (other than prey species), while the ecosystem monitoring program for pelagic habitats is much more limited than its demersal fish counterpart. More process oriented research

is required to link fish production to the functional properties of pelagic and benthic EFH. There is a need for the SBNMS management and that at the NOAA Fisheries Northeast Regional Office (NERO) to better coordinate their scientific monitoring/research programs with management objectives to protect and conserve biological diversity and habitats both within the SBNMS and in the wider Gulf of Maine/Georges Bank ecosystem (GoM/GB). NOAA needs to develop an integrated ecosystem assessment of the wider GoM system, similar to the one done on the Eastern Scotian Shelf to support ESSIM (Choi et al., 2005). NOAA needs to view the SBNMS as a component of the wider GoM/GB seascape and manage this from a landscape ecological framework, rather than by mandates based upon the MSFCMA (Magnuson-Stevens Fishery Conservation and Management Act), ESA (Endangered Species Act), MMPA (Marine Mammal Protection Act), etc. This would entail better coordination of research and management, plus a more effective constituent involvement program to resolve potential multi-user, multi-sector conflicts.

Additional monitoring is required on the distribution/abundance of sea birds and their pelagic habitat requirements. This would require cooperation between NOAA Fisheries and NOS. Since forage fish species (menhaden, Atlantic herring, Atlantic mackerel, sand eels, etc.) are important in the bottom up trophic coupling between the plankton and fish, marine mammals and sea birds, this component would benefit from a more comprehensive ecosystem-based monitoring program; associated process oriented research and modelling (Read and Brownstein, 2003). Academic scientists and those within NOAA Fisheries have developed network modelling approaches (Ecopath and EcoNetwrk) that allow one to incorporate bottom up trophic components into the management advice provided in the stock assessment process. Multispecies VPAs allow predator-prey interactions to be incorporated into management advice. New modeling approaches need to be developed to incorporate advice on the impacts of fisheries harvesting on EFH and biological diversity of other components of the marine ecosystem. The New England Fishery Management Council (NEFMC) development of the second Omnibus Habitat Amendment for the Council's 27 managed species offers an opportunity to examine the effects of mobile fishing gear on EFH and direct/indirect impacts of fishing on biodiversity (from genetics to populations/communities).

The SBNMS needs to operationally define "ecosystem integrity" and their "compatibility" guidelines in order to develop an adaptive management approach for protecting the biotic resources and habitat within the sanctuary's boundaries. This implies that NOAA Fisheries and NOS have to cooperate more efficiently than has been the case in the past in order to have an integrated management effort both within the sanctuary and in the wider GoM/GB ecosystem (since what happens outside the sanctuary provides the context for what occurs inside). Sometimes conflicts arise between the mandates for managing the SBNMS and those under which NOAA Fisheries operates. Since NOAA Fisheries is moving towards an ecosystem approach for management (EAM) which features place-based rule making, it may be necessary to consider separate rules for the SBNMS to encompass its mandates under the NMS Act. As mentioned earlier the Canadian ESSIM initiative can be used for lessons learned on how to pursue an integrated management approach for multisector uses and coordinate the activities of diverse constituents (Choi et al., 2005; Rutherford et al., 2005). It took a many years to implement ESSIM, so that in our view NOAA has a long way to go for implementing an EAM for the SBNMS and the surrounding GoM ecosystem.

One final point is that climate change in the marine environment from human activities is likely to exacerbate the future effects associated with fisheries harvesting. Given the fish community changes in Narragansett Bay (Collie et al., 2008), climate change (natural and human-induced) effects have become apparent for inshore ecosystems. It is likely that the distribution of forage fish species will show either seasonal or annual shifts in the foci of distribution/abundance on the Northeast Continental Shelf, which implies that new efforts will be required in monitoring, process oriented research and modeling to understand how climate change interacts with the direct/indirect impacts from fishing. These changes may

exacerbate the fisheries harvesting induced regime shift in the northwest Atlantic ecosystem from demersal to pelagic-dominated fish community plus increased invertebrates (Choi et al., 2005). This might also include the need to better understand the effects of eutrophication in coastal waters and the MWRA (Massachusetts Water Resources Authority) outfall pipe's water quality impacts on the SBNMS biotic resources and habitat. The SBNMS MP&EA provides a good background on the multiple human threats facing the sanctuary resources and the Action Plans offer some solutions.

The SBNMS lies along the gradient between coastal waters, continental shelf and off shelf water masses and these all interact to influence what happens with the sanctuary's boundaries. This has to be viewed as an integrated physical, chemical and biological system from both the science side and the resultant management actions. The two ocean commissions (Pew and U.S.) emphasized this need, but the federal government has not implemented this perspective either scientifically or in management. The Sierra Club favors using regional coastal commissions to integrate local/state/federal management actions. Potential management models include the California Commission or Gulf of Maine Council on the Marine Environment. On the scientific side the Gulf of Maine Ocean Observing System (GoMOOS) might offer a useful model. We face a future in which multiple human stressors will impact the SBNMS resources and these will emanate from local, state and federal jurisdictional units. Since all three levels of government face severe constraints on financial and personnel resources, there is a need to prioritize the activities required to address the problems highlighted in the SBNMS MP&EA. The CC&I Group feels that this document has made a good start in this prioritization.

Bibliography:

Choi, J.S., K.T. Frank, B.D. Petrie, and W.G. Leggett. 2005. Integrated assessment of a large marine ecosystem: a case study of the devolution of the eastern Scotian Shelf, Canada. *Oceaography & Marine Biology Annu. Rev.* 43: 47-67.

Collie, J.S., A.D. Wood, and H.P. Jeffries. 2008. Long-term shifts in the species composition of a coastal fish community. *Can. J. Fish. Aquat. Sci.* 65: 1352-1365.

Grafton, R.Q., R. Hilborn, et al. 2008. Positioning fisheries in a changing world. *Marine Policy* 32: 630-634.

Read, A.J. and C.R. Brownstein. 2003. Considering other consumers: Fisheries, predators, and Atlantic herring in the Gulf of Maine. *Ecology & Society* 7 (1); art. 2; 11 p.

Rutherford, R.J., G.J. Herbert and S.S. Coffen-Smout. 2005. Integrated ocean management and the collaborative planning process: the Eastern Scotian Shelf Integrated Management (ESSIM) initiative. *Marine Policy* 29: 75-83

Thanks for considering our comments and proposed suggestions for improvement in this document.

Dr. David Dow
Treasurer, Cape Cod & the Islands Group- Sierra Club
18 Treetop Lane
East Falmouth, Ma. 02536-4814
Phone: 508-540-7142
Email: ddow@cape.com

From: W. D. Grafton III <wdgrafton@hotmail.com>
To: sbplan@noaa.gov
Subject: SBNMS Draft Management Plan Comments
Date: 10/03/2008 11:12:45 PM

Recently, I had the pleasure of listening to a presentation of the Stellwagen Bank National Marine Sanctuary (SBNMS) Draft Management Plan. I am new to the issues but I would like to express the following:

- 1) Management of the Herring fishery within the SBNMS seems to be an important topic. Local rivers with historical Herring Runs have experienced substantially diminished herring counts. I also understand that 7 million tons of herring have been taken each year from the SBNMS since the 1990s. Considering the dwindling counts of Herring observed in a number of local rivers with historical Herring Run and the large take of Herring within the SBNMS, it seems that a management plan is needed to sustain the Herring population.
- 2) Prevention of a Sand Lance fishery within the SBNMS is a paramount concern. Reduction of the sand lance population within the SBNMS by allowing fishing/harvesting in the future would have a significant impact of the species that rely on the sand lance for survival. A proactive step preventing the emergence of a sand lance fishery would seem warranted.
- 3) Expanding/training the organizations permitted to disentangle whales and other large marine mammals from floating gear would be helpful considering that 50-70% of the Humpback and Right Whales within the Gulf of Maine show signs of entanglement, that virtually the entire SBNMS is fished by some form of gear and that the residence time of humpack and right whales within the SBNMS exposes them to floating gear (e.g.) ghost nets, it seems that a larger coordinated effort to disentangle whales is merited.
- 4) Considering the impact of floating and eventually sinking fishing gear on the fauna and historical resources of the SBNMS, it seems that launching an expansion to an emerging interest in collecting floating gear and utilizing it as "trash-to-energy" might have some success. I understand that a program called "Fishing For Energy" was launched in Gloucester, MA in February 2008. With support and permission from the SBNMS, this program could expand beyond the small number of ports that have committed to support this program to date and could help introduce additional ports within the fishing community to join the emerging program and expand operations within the confines of the SBNMS. This program was modeled after a successful program in Hawaii an area which experiences all sizes of floating marine debris ranging from microscopic sized particles through ghost nets.

I wish you well in the process and hope my comments are helpful. Sincerely, Bill Grafton

Want to do more with Windows Live? Learn “10 hidden secrets” from Jamie. [Learn Now](#)

From: ddow@cape.com
To: sbplan@noaa.gov
Subject: Fwd: Stellwagen Bank National Marine Draft Management Plan and EAComments
Date: 10/03/2008 4:37:59 PM

Attachment N1: untitled-[2]

The Massachusetts Chapter- Sierra Club will submit separate comments on marine mammal concerns than those submitted by the Cape Cod ? Group on fisheries ?

----- Original Message -----

Subject: Fwd: Stellwagen Bank National Marine Draft Management Plan and EA Comments
From: "David Dow"
Date: Thu, October 2, 2008 7:16 am
To: sbplan@noaa.gov
Cc: "David Dow"
"billie bates"
"R Philip Dowds"
"James McCaffrey"
"Jay Miller"
"Bob Murphy"

> Comments on Stellwagen Bank National Marine Sanctuary's Draft
> Management Plan and Environmental Assessment (MP)?

The Cape and the Islands Group- Sierra Club (CC? assessment of the Stellwagen Bank National Marine Sanctuary's (SBNMS) draft Management Plan and Environmental Assessment that some of the sanctuaries key biological resources are in trouble from human activities (especially fishing, ship traffic, whale watching and climate change). Thus our comments will concentrate on the threats to fish populations (target and non-target)/ marine mammals (especially North Atlantic right whales) and their supporting habitats. Portions of the SBNMS are critical habitat for the North Atlantic right whale and other whales listed under the Endangered Species Act (ESA). Many of these whale populations are listed as strategic stocks under the Marine Mammal Protection Act (MMPA), so that human impacts are a pervasive problem for recovery of many whale species. Thus it is critical to protect the pelagic habitats that these whales occupy, especially zooplankton prey (*Calanus finmarchicus*) populations for right whales (and other planktivores) and Atlantic herring for humpback whales (and other piscivores). Forage prey species, such as Atlantic herring, are important for many fish populations, marine mammals and seabirds, so that we have concerns about the directed fishery for this species in the emerging Fishery Management Plan (FMP).

Many demersal fish populations depend upon benthic essential fish habitat (EFH) for food, shelter and reproduction, so that we have have a concern about the impacts of mobile fishing gear on EFH. In addition, there is excess commercial and recreational harvesting of many of the target fish/shellfish species; bycatch of non-target species which diminishes the ecological integrity of the wider ecosystem and incidental mortality of marine mammals and sea turtles by static fishing gear. The CC?

Massachusetts Chapter- Sierra Club will submit separate comments on protected species issues, especially North Atlantic right whale protection. It is possible that the Sierra Club's national Marine Wildlife ? whales as well.

The CC?

gear on benthic EFH and approaches for reducing the impacts of static fishing gear, ship strikes and whale watching on whale populations. We feel that the National Oceanic and Atmospheric Administration (NOAA) needs to better coordinate the role of NOAA Fisheries in managing fish/shellfish and protected species (marine mammals and sea turtles) with the role of the National Ocean Service (NOS) in protecting the biological resources within the SBNMS which have been impacted by human activities for which NOAA has management responsibility (Interagency Coordination Action Plan). Given the move towards an ecosystem approach to management (EAM) and the designation of spatial management zones with special regulations as part of this process, we feel that the SBNMS needs to fall in this category if it is to meet its mandate to protect the living marine, protected and natural trust resources within its boundaries. We are disappointed that there is no action plan to address natural trust resources (i.e. seabirds at al.) within the Management Plan, even though they are mentioned in the Environmental Assessment. Many of our members have strong interests in conserving shorebirds and seabirds, so that we would like to see greater acknowledgement of this issue in the document. An ocean zoning approach is needed within the SBNMS in order to allow compatible human activities with the the protection of the biological resources, but the Compatibility Determination Action Plan provides no information on this topic. We stand ready to help in elaborating this action plan.

>

> Effects of Fishing on the Biotic Resources and Habitats within the
> SBNMS:

> The Cape Cod and the Islands Group- Sierra Club agrees with the
> conclusion in the draft SBNMS draft Management Plan and Environmental
> Assessment (MP)?
> harvesting have impacted the biotic resources and habitats within the
> sanctuary's boundaries. Even though the Sierra Club supported the
> original compromise that allowed commercial and recreational fishing
> within the newly designated sanctuary, we feel that in light of its

> adverse impacts that some constraints need to be placed on where this
> activity occurs and that the overall harvest level needs to be
> reduced. We envision using the SBNMS and adjacent western Gulf of
> Maine Closed Area (WGoM CA) as test areas to examine the effects of
> mobile fishing gear on Essential Fish Habitat (EFH) and the role of
> incidental catch of non-target fish species, plus the static fishing
> gear impacts on bycatch of protected species (marine mammals)/natural
> trust resources (seabirds). This proposal would require cooperation
> between NOAA Fisheries and the National Ocean Service (which oversees
> the SBNMS) which haven't always shared the same management visions for
> this special place. This section will focus on the direct and indirect
> effects of fisheries harvesting on the target species, their prey and
> EFH.

>

> We advocate the use of a significant portion of the WGoM CA (that
> overlaps boundaries of SBNMS) as a no take Marine Protected Area
> (MPA). This MPA would serve as the natural baseline to examine fishing
> impacts from zoned fishing gear areas (mobile and static) within the
> SBNMS, where different areas would be set aside for different types of
> commercial and recreational fishing activities. Using realistically
> sized zones for different fishing gears within the SBNMS and
> comparing this to the WGOM CA MPA would allow the National Oceanic and
> Atmospheric Administration (NOAA) to develop management regulations
> that would promote sustainable fisheries, while at the same time
> protecting the biotic resources and habitats (pelagic and benthic)
> within the SBNMS. This approach is consistent with the Massachusetts
> Chapter's Sustainable Fisheries Policy and that developed at the
> national level by the Marine Wildlife ?

> Group helped develop the Chapter's Sustainable Fisheries Policy in the
> mid- 1990's, so that we have had a long term interest in this issue.
> This would be consistent with the recent call (Grafton et al., 2008)
> by fisheries scientists to move towards sustainability in managing
> fisheries. The SBNMS needs to ensure biodiversity, ecosystem
> integrity, societal amenities and sustainable uses of biotic resources
> which will require changes in governance and management institutions.
> There needs to be better balance between the protection of public
> resources and private benefits within the SBNMS boundaries.

>

> This suggestion would support concepts advanced in the MP?

> Compatibility and Ecosystem Protection Action Plans. The Compatibility
> Action Plan would greatly benefit from the applied research/ecosystem
> monitoring/modelling concept briefly described above for a new ocean
> zoning approach. All of these scientific components would be required
> to support an adaptive management program required to allow
> sustainable fishing, while protecting the the SBNMS's biotic resources
> and habitats. The Ecosystem Protection Action Plan addresses
> ecosystem-based management (EbM) and ecosystem alteration which would
> require cooperation by NOAA Fisheries and NOAA NOS. NOAA Fisheries has
> management responsibilities for fisheries harvesting; protection of
> marine mammals and sea turtles and natural trust resources (sea
> birds). The Canadian Eastern Scotian Shelf Integrated Management

> (ESSIM) plan provides a good example of the required framework
> (Rutherford et al., 2005) that should be pursued within the GoM/SBNMS
> ecosystem between different components of NOAA and other
> federal/state management entities.
>
> The Northeast Fisheries Science Center's (NEFSC) fishery independent
> Bottom Trawl Survey (BTS) with its fish stomach data base provide a
> useful long term database on the distribution/abundance of target fish
> species and their prey (finfish and invertebrates). There is no long
> term monitoring program for the benthic components of EFH (other than
> prey species), while the ecosystem monitoring program for pelagic
> habitats is much more limited than its demersal fish counterpart. More
> process oriented research is required to link fish production to the
> functional properties of pelagic and benthic EFH. There is a need for
> the SBNMS management and that at the NOAA Fisheries Northeast Regional
> Office (NERO) to better coordinate their scientific
> monitoring/research programs with management objectives to protect and
> conserve biological diversity and habitats both within the SBNMS and
> in the wider Gulf of Maine/Georges Bank ecosystem (GoM/GB). NOAA needs
> to develop an integrated ecosystem assessment of the wider GoM system,
> similar to the one done on the Eastern Scotian Shelf to support ESSIM
> (Choi et al., 2005). NOAA needs to view the SBNMS as a component of
> the wider GoM/GB seascape and manage this from a landscape ecological
> framework, rather than by mandates based upon the MSFCMA
> (Magnuson-Stevens Fishery Conservation and Management Act), ESA
> (Endangered Species Act), MMPA (Marine Mammal Protection Act), etc.
> This would entail better coordination of research and management, plus
> a more effective constituent involvement program to resolve potential
> multi-user, multi-sector conflicts.
>
> Additional monitoring is required on the distribution/abundance of sea
> birds and their pelagic habitat requirements. This would require
> cooperation between NOAA Fisheries and NOS. Since forage fish species
> (menhaden, Atlantic herring, Atlantic mackerel, sand eels, etc.) are
> important in the bottom up trophic coupling between the plankton and
> fish, marine mammals and sea birds, this component would benefit from
> a more comprehensive ecosystem-based monitoring program; associated
> process oriented research and modelling (Read and Brownstein, 2003).
> Academic scientists and those within NOAA Fisheries have developed
> network modelling approaches (Ecopath and EcoNetwrk) that allow one to
> incorporate bottom up trophic components into the management advice
> provided in the stock assessment process. Multispecies VPAs allow
> predator-prey interactions to be incorporated into management advice.
> New modeling approaches need to be developed to incorporate advice on
> the impacts of fisheries harvesting on EFH and biological diversity of
> other components of the marine ecosystem. The New England Fishery
> Management Council (NEFMC) development of the second Omnibus Habitat
> Amendment for the Council's 27 managed species offers an opportunity
> to examine the effects of mobile fishing gear on EFH and
> direct/indirect impacts of fishing on biodiversity (from genetics to
> populations/communities).

>

> The SBNMS needs to operationally define "ecosystem integrity" and
> their "compatibility" guidelines in order to develop an adaptive
> management approach for protecting the biotic resources and habitat
> within the sanctuary's boundaries. This implies that NOAA Fisheries
> and NOS have to cooperate more efficiently than has been the case in
> the past in order to have an integrated management effort both within
> the sanctuary and in the wider GoM/GB ecosystem (since what happens
> outside the sanctuary provides the context for what occurs inside).
> Sometimes conflicts arise between the mandates for managing the SBNMS
> and those under which NOAA Fisheries operates. Since NOAA Fisheries is
> moving towards an ecosystem approach for management (EAM) which
> features place-based rule making, it may be necessary to consider
> separate rules for the SBNMS to encompass its mandates under the NMS
> Act. As mentioned earlier the Canadian ESSIM initiative can be used
> for lessons learned on how to pursue an integrated management approach
> for multisector uses and coordinate the activities of diverse
> constituents (Choi et al., 2005; Rutherford et al., 2005). It took a
> many years to implement ESSIM, so that in our view NOAA has a long way
> to go for implementing an EAM for the SBNMS and the surrounding GoM
> ecosystem.

>

> One final point is that is that climate change in the marine
> environment from human activities is likely to exacerbate the future
> effects associated with fisheries harvesting. Given the fish community
> changes in Narragansett Bay (Collie et al., 2008), climate change
> (natural and human-induced) effects have become apparent for inshore
> ecosystems. It is likely that the distribution of forage fish species
> will show either seasonal or annual shifts in the foci of
> distribution/abundance on the Northeast Continental Shelf, which
> implies that new efforts will be required in monitoring, process
> oriented research and modeling to understand how climate change
> interacts with the direct/indirect impacts from fishing. These changes
> may exacerbate the fisheries harvesting induced regime shift in the
> northwest Atlantic ecosystem from demersal to pelagic-dominated fish
> community plus increased invertebrates (Choi et al., 2005). This might
> also include the need to better understand the effects of
> eutrophication in coastal waters and the MWRA (Massachusetts Water
> Resources Authority) outfall pipe's water quality impacts on the SBNMS
> biotic resources and habitat. The SBNMS MP?
> background on the multiple human threats facing the sanctuary
> resources and the Action Plans offer some solutions.

>

> The SBNMS lies along the gradient between coastal waters, continental
> shelf and off shelf water masses and these all interact to influence
> what happens with the sanctuary's boundaries. This has to be viewed as
> an integrated physical, chemical and biological system from both the
> science side and the resultant management actions. The two ocean
> commissions (Pew and U.S.) emphasized this need, but the federal
> government has not implemented this perspective either scientifically
> or in management. The Sierra Club favors using regional coastal

> commissions to integrate local/state/federal management actions.
> Potential management models include the California Commission or Gulf
> of Maine Council on the Marine Environment. On the scientific side the
> Gulf of Maine Ocean Observing System (GoMOOS) might offer a useful
> model. We face a future in which multiple human stressors will impact
> the SBNMS resources and these will emanate from local, state and
> federal jurisdictional units. Since all three levels of government
> face severe constraints on financial and personnel resources, there is
> a need to prioritize the activities required to address the problems
> highlighted in the SBNMS MP?

> document has made a good start in this prioritization.

>

> Bibliography:

> Choi, J.S., K.T. Frank, B.D. Petrie, and W.G. Leggett. 2005.
> Integrated assessment of a large marine ecosystem: a case study of the
> devolution of the eastern Scotian Shelf, Canada. *Oceaogaphy* ?
> *Biology Annu. Rev.* 43: 47-67.

>

> Collie, J.S., A.D. Wood, and H.P. Jeffries. 2008. Long-term shifts in
> the species composition of a coastal fish community. *Can. J. Fish.*
> *Aquat. Sci.* 65: 1352-1365.

>

> Grafton, R.Q., R. Hilborn, et al. 2008. Positioning fisheries in a
> changing world. *Marine Policy* 32: 630-634.

>

> Read, A.J. and C.R. Brownstein. 2003. Considering other consumers:
> Fisheries, predators, and Atlantic herring in the Gulf of Maine.
> *Ecology* ? art. 2; 11 p.

>

> Rutherford, R.J., G.J. Herbert and S.S. Coffen-Smout. 2005.
> Integrated ocean management and the collaborative planning process:
> the Eastern Scotian Shelf Integrated Management (ESSIM) initiative.
> *Marine Policy* 29: 75-83

Thanks for considering our comments and proposed suggestions for improvement in this document.

Dr. David Dow
Treasurer, Cape Cod ?
18 Treetop Lane
East Falmouth, Ma. 02536-4814
Phone: 508-540-7142
Email: ddow@cape.com
>

From: Meredith Tanguay <meredith.tanguay@gmail.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank Draft Management Plan Comment
Date: 10/03/2008 4:25:01 PM

As a diver, I do not support a Stellwagen Bank National Marine Sanctuary Management Plan that would restrict access to any shipwrecks within the sanctuary. I also do not support a permitting program. In other sanctuary and protected areas, divers have proven to be a low-impact usage group and have benefited the mission of the sanctuary or preserve by enhancing public awareness and/or contributing to conservation, education and research initiatives.

In Ontario, Canada, the management of historic and submerged resources is extremely successful. The Ontario Heritage Act protects resources both above and below water while still allowing nearly unrestricted access to these resources by the public. Wreck, historic or not, are open to divers in a no-take, no-disturb capacity, without the need or obstacle of permits. The no-take, no-disturb restrictions are the only ones placed on the wrecks protected by the Ontario Heritage Act.

Three benefits of the Ontario Heritage Act have been:

1. PROTECTION: Access to and enjoyment of these wrecks has created a culture of guardianship in the dive community thus fostering self-policing of the no-take policies in place. Such self-policing reduces and nearly eliminates management resources and funding dedicated to compliance. The dive community places a priority on protecting and preserving these wrecks, actually strengthening the protection already in place. In Ontario, divers have created mooring projects, organized yearly mooring maintenance events and started "Save Ontario's Shipwrecks" and "Preserve Our Wrecks" as non-profit groups focused on preservation and education. Wide usage of live-boating techniques and off-set moorings eliminate anchor or tie-in damage to submerged resources.
2. ECONOMIC: Ease of access creates a draw of divers into the area, both local and from afar, therefore injecting additional dollars into diving, hotel, restaurant and other tourism-related, local businesses. Divers from Massachusetts are known to travel 8 hours each way several times a year to pump monkey into the Ontario economy while diving Ontario's protected, yet unrestricted-access shipwrecks.
3. RESEARCH: Ease of access to the shipwrecks creates the opportunity for divers to contribute to the pool of data accessible to scientists studying the wrecks or wildlife in the reserve. The openness of the dive community, fostered by unrestricted access, has encouraged divers to immediately share the results of unexpected finds of unknown/rediscovered shipwrecks or other submerged resources with the public. It is a common occurrence in Ontario for a group of private citizens to locate a "new" wreck, place an offset mooring, start a survey and publish GPS coordinates within one week of the initial find. Often hobbyist divers, operating on their own funds and often without the significant restrictions placed on commercial divers, are able to perform photo/video survey, in situ measurement survey, or fish-count dives that research or government organizations do not have the budget, personnel, depth/exposure range, or insurance-latitude to conduct independently. There is significant history of such diver-researcher cooperation in Ontario, facilitated by most projects not requiring permitting. Many of the divers involved in such projects have formal education in the sciences and scientific method and/or have obtained specific training in underwater archaeological survey methods thru the Nautical Archeological Society program for recreational divers.

By working with the dive community as a usage group, protection, economic and research benefits can be realized. Community-partnered preservation and research efforts can only be effective if unrestricted access is granted to divers. Any time-consuming or multi-step permitting process for non-disturbance diving activities would alienate the dive community and place the shipwrecks and other submerged resources at risk.

I urge NOAA to share the information they currently have on shipwrecks in the Sanctuary so that we can all work together to understand these public resources before the wrecks and other submerged resources naturally disintegrate. Further, I urge NOAA to revise the management plan so that it does not restrict access to divers nor require permitting for non-disturbance, pleasure diving.

Respectfully submitted,

Meredith Tanguay

68 The Fairways

Ipswich, MA 01938

meredith.tanguay@gmail.com

From: STEVE BLANCHARD <scubasteveblanc@hotmail.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary Management
Date: 10/03/2008 4:23:37 PM

As a diver, I do not support a Stellwagen Bank National Marine Sanctuary Management Plan that would restrict access to any shipwrecks within the sanctuary. I also do not support a permitting program.

Respectfully submitted,
Steve Blanchard

From: Deb Fraize <debfraize@yahoo.com>
To: sbplan@noaa.gov
Subject: Comments on Draft Management Plan
Date: 10/03/2008 3:38:32 PM

Dear SBNMS staff:

I greatly appreciate your efforts on the Draft Management Plan and your ongoing efforts on behalf of the health of the sanctuary. As a citizen of Massachusetts, I write to provide this one general comment on the plan:

The sanctuary should be treated a special place and serve as a model for better stewardship of our ocean resources. In other words, greater restrictions on all commercial activities (particularly) in the sanctuary than exist in the surrounding waters.

Thank you for this opportunity to provide comments.

Very best regards,

Deb Fraize
114 Fayerweather Street, No. 2
Cambridge, MA 02138

From: Ron Scharf <ron@scharf.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary Management Plan
Date: 10/03/2008 3:25:26 PM

Dear Sirs,

As a diver, I do not support a Stellwagen Bank National Marine Sanctuary Management Plan that would restrict access to any shipwrecks within the sanctuary. I also do not support a permitting program.

Respectfully submitted,

Dr. Ronald F. Scharf
Waltham, Massachusetts

From: Christine Siegel <chrisnycdive@yahoo.com>
To: sbplan@noaa.gov
Subject: Draft Management Plan
Date: 10/03/2008 3:23:42 PM

As a diver, I do not support a Stellwagen Bank National Marine Sanctuary Management Plan that would restrict access to any shipwrecks within the sanctuary. I also do not support a permitting program.

Regards,

Christine Siegel

From: Dutton_Harold@emc.com
To: sbplan@noaa.gov
Subject: National Marine Sanctuary's DMP
Date: 10/03/2008 2:09:59 PM

I have been a diver now for 30+ years and The government is always wanting to step in and take our rights away. This is going to be a new election year were we are going to take our right back and I don't agree with restricting access to sanctuary shipwrecks and that you don't support a permitting program.

From: jcrounse02@aol.com
To: sbplan@noaa.gov
Subject: Stellwagen Bank Management Plan
Date: 10/03/2008 8:47:34 AM

October 1, 2008

To whom it may concern,

I am writing to comment on the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I appreciate the opportunity to allow my thoughts on the plan to be heard.

To me, the Stellwagen Bank National Marine Sanctuary is a special place. I care very much about the protection of the wildlife and ecosystem that it protects.

Let me start by thanking the Sanctuary for this thorough evaluation of their management actions. Protecting this complex environment, with its many human uses (such as fishing, whalewatching, and recreational boating among others), is not an easy feat. I am very supportive of your ultimate goal of resource protection.

The management plan offers many actions that address a wide variety of issues. If they were all to be accomplished, the Stellwagen Sanctuary would be a much better protected area. However, with the current Sanctuary budget, as well as because of other constraints, it is unlikely that all of these actions can be undertaken in the next five years. It would be very helpful to have a clearer presentation of how these actions will be prioritized, and what management actions are deemed to be most important as a result of this plan.

However, there are four areas which seem to be identified as priority items. These are 1) The Whale Watch Program, 2) The Maritime Heritage Program (e.g. shipwrecks and artifacts); 3) Forage Base Management; and 4) Habitat Zoning and Human Use Compatibility Analysis. These are presented in documents and timelines in both the Management Plan and BankNotes, the accompanying Management Plan summary.

Assuming these are the priority items, I would offer the following comments:

1. **Whale Watch Program:** I agree that the Sanctuary should look for ways to partner with the industry and encourage commercial whale watch boats to comply with the official whalewatch guidelines. Further, I agree with the Sanctuary that disturbance of whales by private whale watch boats, commercial fishing boats that target whales, and other boats is worth addressing. However, putting in simple approach regulations for whales (such as a 100-yard approach regulation, as exists in many areas) has no data to support any positive conservation value, and may not do anything to protect whales other than the far more complex existing guidelines and, if they result in the removal of the suggested speed limits around whales, could be detrimental.
2. **Maritime Heritage Program:** While I applaud the concept of the program, the limited resources of the Sanctuary should focus on developing management actions to protect marine life and the marine ecosystem. Only after significant progress has been made in protecting the Sanctuary's biological resources should expansion of the marine heritage program take place.
3. **Forage Management (protection of prey species):** I am strongly supportive of these actions to protect prey resources, especially to protect herring and sand lance from fishing pressures, and commend the Sanctuary for taking important steps toward insuring the integrity of the marine ecosystem.
4. **Habitat Zoning:** I support the activities proposed here, but think that they may not go far enough. The current plan only suggests that there will be a *process* put in place to determine what

activities are or are not compatible with the ultimate goal of resource protection. By the end of the five years, I would like to see each use considered with this process, to see where we many need to take future actions. If sufficient resources are put to this task, this should be possible in a five-year time frame.

In addition, I feel that the following actions should be given added priority:

1. Evaluation of incorporating Jeffreys Ledge into the Stellwagen Sanctuary. The southern third of Jeffreys Ledge, another glacial deposit of high productivity, is included in the Sanctuary. I support the Sanctuary undertaking a study during the next five years to determine whether the full length of the Ledge should be incorporated into the Sanctuary. Jeffreys Ledge is a very important habitat for highly endangered North Atlantic right whales, is one of the most important herring spawning habitats in the entire Gulf of Maine, and is an important ecological buffer to Stellwagen Bank. By the time of the next plan, a full evaluation of the possibility of including all of the Ledge should be possible.
2. Development of a plan to monitor water quality on Stellwagen should be encouraged. With the myriad of uses taking place on or near the Sanctuary, such a monitoring program is vital for warning signs of ecosystem health.
3. Establishing the Sanctuary as a testing ground for whale-safe fishing gear. Recently, scientists stated that the only fishing gear known to eliminate the risk of whale entanglement is through rope-less fishing. We think access to fishery resources in some part of the Sanctuary should be awarded to fishermen willing to test innovative ways to achieve this goal, and obtain a financial reward in the process.

Thank you for the opportunity to comment on the plan. I look forward to seeing what revisions come in the next version of the plan, and hope that together we can work to preserve the ecosystem of Stellwagen Bank for many generations to come.

Sincerely,

Debra Crounse

Find phone numbers fast with the [New AOL Yellow Pages!](#)

From: nkeeney@bu.edu
To: sbplan@noaa.gov
Subject: Draft Management Plan comment
Date: 10/02/2008 11:35:54 PM

As a marine science student at Boston University currently studying megafaunal ecology in and around Stellwagen Bank National Marine Sanctuary I am writing to suggest a line of thought that was not represented in the current iteration of the Draft Management Plan. The plan is comprehensive, and successfully addresses direct and indirect ways to manage human uses of the sanctuary. The proposed increases in administrative and enforcement infrastructure in particular will greatly benefit the Sanctuary, related programs and stakeholders.

However, I am concerned that although problems associated with fishing and lobstering gear are addressed the action plan does not adequately face the potential problem of diet replacement in wild lobsters. The commercial lobster industry creates a human source of food through its ubiquitous use of bait herring that may cause dietary dependence and a shift away from natural foraging behavior in Massachusetts? American lobsters. The high trap escape rate and releases based on size and v-notching ensure that much of this bait is supporting the extremely large current populations that have led to such high valued landings in recent years. A study by the American lobster aquaculture program at New England Aquarium has shown that lab-raised specimens feeding on a homogenous herring diet had higher mortality and a higher incidence of shell disease (especially affecting juveniles). These individuals died or were significantly afflicted well within the seven years it is estimated to take a lobster to reach commercial size. Shell disease poses a serious threat in the wild due to a decrease in protection offered by a heavily lesioned shell. It can also cause berried females to eject their eggs possibly leading to decreases in the stock replacement rate which may not be evident for several years, and may decrease the value of commercial landings due to the unsightliness of the symptomatic lesions. Whether this means a potential decline in the fishery or disruption of the natural benthic role of the American lobster (or both) is unknown because of the relative lack of research in this field. I suggest inquiry into species-specific and ecosystem effects of this enormous biomass injection, to see whether or not current the lobster industry effort is as sustainable as it is lauded to be.

Sincerely,
Nicholas Keeney
Boston University 2010

From: Cherie Donato <Cherie0803@nycap.rr.com>
To: sbplan@noaa.gov
Subject: No subject
Date: 10/02/2008 8:02:05 PM

Stellwagen Bank National Marine Sanctuary
175 Edward Foster Road
Scituate MA 02066
October 2,, 2008

To whom it may concern,

I am writing to comment on the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I appreciate the opportunity to allow my thoughts on the plan to be heard.

To me, the Stellwagen Bank National Marine Sanctuary is a special place. I care very much about the protection of the wildlife and ecosystem that it protects.

Let me start by thanking the Sanctuary for this thorough evaluation of their management actions. Protecting this complex environment, with its many human uses (such as fishing, whalewatching, and recreational boating among others), is not an easy feat. I am very supportive of your ultimate goal of resource protection.

The management plan offers many actions that address a wide variety of issues. If they were all to be accomplished, the Stellwagen Sanctuary would be a much better protected area. However, with the current Sanctuary budget, as well as because of other constraints, it is unlikely that all of these actions can be undertaken in the next five years. It would be very helpful to have a clearer presentation of how these actions will be prioritized, and what management actions are deemed to be most important as a result of this plan.

However, there are four areas which seem to be identified as priority items. These are 1) The Whale Watch Program, 2) The Maritime Heritage Program (e.g. shipwrecks and artifacts); 3) Forage Base Management; and 4) Habitat Zoning and Human Use Compatibility Analysis. These are presented in documents and timelines in both the Management Plan and BankNotes, the accompanying Management Plan summary.

Assuming these are the priority items, I would offer the following comments:

1. **Whale Watch Program:** I agree that the Sanctuary should look for ways to partner with the industry and encourage commercial whale watch boats to comply with the official whalewatch guidelines. Further, I agree with the Sanctuary that disturbance of whales by private whale watch boats, commercial fishing boats that target whales, and other boats is worth addressing. However, putting in simple approach regulations for whales (such as a 100-yard approach regulation, as exists in many areas) has no data to support any positive conservation value, and may not do anything to protect whales other than the far more complex existing guidelines and, if they result in the removal of the suggested speed limits around whales, could be detrimental.
2. **Maritime Heritage Program:** While I applaud the concept of the program, the limited resources of the Sanctuary should focus on developing management actions to protect marine life and the marine ecosystem. Only after significant progress has been made in protecting the Sanctuary's biological resources should expansion of the marine heritage program take place.
3. **Forage Management (protection of prey species):** I am strongly supportive of these actions to protect prey resources, especially to protect herring and sand lance from fishing pressures, and commend the Sanctuary for taking important steps toward insuring the integrity of the marine ecosystem.
4. **Habitat Zoning:** I support the activities proposed here, but think that they may not go far enough. The current plan only suggests that there will be a process put in place to determine what activities are or are not compatible with the ultimate goal of resource protection. By the end of the five years, I would

like to see each use considered with this process, to see where we many need to take future actions. If sufficient resources are put to this task, this should be possible in a five-year time frame. In addition, I feel that the following actions should be given added priority:

1. Evaluation of incorporating Jeffreys Ledge into the Stellwagen Sanctuary. The southern third of Jeffreys Ledge, another glacial deposit of high productivity, is included in the Sanctuary. I support the Sanctuary undertaking a study during the next five years to determine whether the full length of the Ledge should be incorporated into the Sanctuary. Jeffreys Ledge is a very important habitat for highly endangered North Atlantic right whales, is one of the most important herring spawning habitats in the entire Gulf of Maine, and is an important ecological buffer to Stellwagen Bank. By the time of the next plan, a full evaluation of the possibility of including all of the Ledge should be possible.
2. Development of a plan to monitor water quality on Stellwagen should be encouraged. With the myriad of uses taking place on or near the Sanctuary, such a monitoring program is vital for warning signs of ecosystem health.
3. Establishing the Sanctuary as a testing ground for whale-safe fishing gear. Recently, scientists stated that the only fishing gear known to eliminate the risk of whale entanglement is through rope-less fishing. We think access to fishery resources in some part of the Sanctuary should be awarded to fishermen willing to test innovative ways to achieve this goal, and obtain a financial reward in the process.

Thank you for the opportunity to comment on the plan. I look forward to seeing what revisions come in the next version of the plan, and hope that together we can work to preserve the ecosystem of Stellwagen Bank for many generations to come.

Sincerely,
Cherie L. Donato

From: fowler61@juno.com
To: sbplan@noaa.gov
Subject: Stellwagen Sanctuary National Marine Sanctuary
Date: 10/02/2008 7:58:52 PM

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

October 2, 2008

To whom it may concern,

I am writing to comment on the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I appreciate the opportunity to allow my thoughts on the plan to be heard. To me, the Stellwagen Bank National Marine Sanctuary is a special place. I care very much about the protection of the wildlife and ecosystem that it protects.

Let me start by thanking the Sanctuary for this thorough evaluation of their management actions. Protecting this complex environment, with its many human uses (such as fishing, whale watching, and recreational boating among others), is not an easy feat. I am very supportive of your ultimate goal of resource protection.

The management plan offers many actions that address a wide variety of issues. If they were all to be accomplished, the Stellwagen Sanctuary would be a much better protected area. However, with the current Sanctuary budget, as well as because of other constraints, it is unlikely that all of these actions can be undertaken in the next five years. It would be very helpful to have a clearer presentation of how these actions will be prioritized, and what management actions are deemed to be most important as a result of this plan.

However, there are four areas which seem to be identified as priority items. These are 1) The Whale Watch Program, 2) The Maritime Heritage Program (e.g. shipwrecks and artifacts); 3) Forage Base Management; and 4) Habitat Zoning and Human Use Compatibility Analysis. These are presented in documents and time lines in both the Management Plan and BankNotes, the accompanying Management Plan summary.

Assuming these are the priority items, I would offer the following comments:

1. **Whale Watch Program:** I agree that the Sanctuary should look for ways to partner with the industry and encourage commercial whale watch boats to comply with the official whale watch guidelines. Further, I agree with the Sanctuary that disturbance of whales by private whale watch boats, commercial fishing boats that target whales, and other boats is worth addressing. However, putting in simple approach regulations for whales (such as a 100-yard approach regulation, as exists in many areas) has no data to support any positive conservation value, and may not do anything to protect whales other than the far more complex existing guidelines and, if they result in the removal of the suggested speed limits around whales, could be detrimental.
2. **Maritime Heritage Program:** While I applaud the concept of the program, the limited resources of the Sanctuary should focus on developing management actions to protect marine life and the marine ecosystem. Only after significant progress has been made in protecting the Sanctuary's biological resources should expansion of the marine heritage program take place.
3. **Forage Management (protection of prey species):** I am strongly supportive of these actions to protect prey resources, especially to protect herring and sand lance from fishing pressures, and

commend the Sanctuary for taking important steps toward insuring the integrity of the marine ecosystem.

4. Habitat Zoning: I support the activities proposed here, but think that they may not go far enough. The current plan only suggests that there will be a *process* put in place to determine what activities are or are not compatible with the ultimate goal of resource protection. By the end of the five years, I would like to see each use considered with this process, to see where we many need to take future actions. If sufficient resources are put to this task, this should be possible in a five-year time frame.

In addition, I feel that the following actions should be given added priority:

1. Evaluation of incorporating Jeffreys Ledge into the Stellwagen Sanctuary. The southern third of Jeffreys Ledge, another glacial deposit of high productivity, is included in the Sanctuary. I support the Sanctuary undertaking a study during the next five years to determine whether the full length of the Ledge should be incorporated into the Sanctuary. Jeffreys Ledge is a very important habitat for highly endangered North Atlantic right whales, is one of the most important herring spawning habitats in the entire Gulf of Maine, and is an important ecological buffer to Stellwagen Bank. By the time of the next plan, a full evaluation of the possibility of including all of the Ledge should be possible.
2. Development of a plan to monitor water quality on Stellwagen should be encouraged. With the myriad of uses taking place on or near the Sanctuary, such a monitoring program is vital for warning signs of ecosystem health.
3. Establishing the Sanctuary as a testing ground for whale-safe fishing gear. Recently, scientists stated that the only fishing gear known to eliminate the risk of whale entanglement is through rope-less fishing. We think access to fishery resources in some part of the Sanctuary should be awarded to fishermen willing to test innovative ways to achieve this goal, and obtain a financial reward in the process.

Thank you for the opportunity to comment on the plan. I look forward to seeing what revisions come in the next version of the plan, and hope that together we can work to preserve the ecosystem of Stellwagen Bank for many generations to come.

Sincerely,
Diane Fowler

From: Cliff and Deb Merchant <cliff.deb.merchant@hotmail.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary
Date: 10/02/2008 6:38:14 PM

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

October 1, 2008

To whom it may concern,

I am writing to comment on the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I appreciate the opportunity to allow my thoughts on the plan to be heard.

To me, the Stellwagen Bank National Marine Sanctuary is a special place. I care very much about the protection of the wildlife and ecosystem that it protects. I participate regularly in whale watches in the Sanctuary, and am a member of The Whale Center of New England.

Let me start by thanking the Sanctuary for this thorough evaluation of their management actions.

Protecting this complex environment, with its many human uses (such as fishing, whalewatching, and recreational boating among others), is not an easy feat. I am very supportive of your ultimate goal of resource protection.

The management plan offers many actions that address a wide variety of issues. If they were all to be accomplished, the Stellwagen Sanctuary would be a much better protected area. However, with the current Sanctuary budget, as well as because of other constraints, it is unlikely that all of these actions can be undertaken in the next five years. It would be very helpful to have a clearer presentation of how these actions will be prioritized, and what management actions are deemed to be most important as a result of this plan.

However, there are four areas which seem to be identified as priority items. These are 1) The Whale Watch Program, 2) The Maritime Heritage Program (e.g. shipwrecks and artifacts); 3) Forage Base Management; and 4) Habitat Zoning and Human Use Compatibility Analysis. These are presented in documents and timelines in both the Management Plan and BankNotes, the accompanying Management Plan summary.

Assuming these are the priority items, I would offer the following comments:

1. **Whale Watch Program:** I agree that the Sanctuary should look for ways to partner with the industry and encourage commercial whale watch boats to comply with the official whalewatch guidelines. Further, I agree with the Sanctuary that disturbance of whales by private whale watch boats, commercial fishing boats that target whales, and other boats is worth addressing. However, putting in simple approach regulations for whales (such as a 100-yard approach regulation, as exists in many areas) has no data to support any positive conservation value, and may not do anything to protect whales other than the far more complex existing guidelines and, if they result in the removal of the suggested speed limits around whales, could be detrimental.
2. **Maritime Heritage Program:** While I applaud the concept of the program, the limited resources of the Sanctuary should focus on developing management actions to protect marine life and the marine ecosystem. Only after significant progress has been made in protecting the Sanctuary's biological resources should expansion of the marine heritage program take place.
3. **Forage Management (protection of prey species):** I am strongly supportive of these actions to protect prey resources, especially to protect herring and sand lance from fishing pressures, and commend the Sanctuary for taking important steps toward insuring the integrity of the marine ecosystem.

4. Habitat Zoning: I support the activities proposed here, but think that they may not go far enough. The current plan only suggests that there will be a *process* put in place to determine what activities are or are not compatible with the ultimate goal of resource protection. By the end of the five years, I would like to see each use considered with this process, to see where we many need to take future actions. If sufficient resources are put to this task, this should be possible in a five-year time frame.

In addition, I feel that the following actions should be given added priority:

1. Evaluation of incorporating Jeffreys Ledge into the Stellwagen Sanctuary. The southern third of Jeffreys Ledge, another glacial deposit of high productivity, is included in the Sanctuary. I support the Sanctuary undertaking a study during the next five years to determine whether the full length of the Ledge should be incorporated into the Sanctuary. Jeffreys Ledge is a very important habitat for highly endangered North Atlantic right whales, is one of the most important herring spawning habitats in the entire Gulf of Maine, and is an important ecological buffer to Stellwagen Bank. By the time of the next plan, a full evaluation of the possibility of including all of the Ledge should be possible.
2. Development of a plan to monitor water quality on Stellwagen should be encouraged. With the myriad of uses taking place on or near the Sanctuary, such a monitoring program is vital for warning signs of ecosystem health.
3. Establishing the Sanctuary as a testing ground for whale-safe fishing gear. Recently, scientists stated that the only fishing gear known to eliminate the risk of whale entanglement is through rope-less fishing. We think access to fishery resources in some part of the Sanctuary should be awarded to fishermen willing to test innovative ways to achieve this goal, and obtain a financial reward in the process.

Thank you for the opportunity to comment on the plan. I look forward to seeing what revisions come in the next version of the plan, and hope that together we can work to preserve the ecosystem of Stellwagen Bank for many generations to come.

Sincerely,
Debra and Clifford Merchant

Get more out of the Web. Learn 10 hidden secrets of Windows Live. [Learn Now](#)

From: chapinz@verizon.net
To: sbplan@noaa.gov
Subject: Make Stellwagen Bank a true marine sanctuary
Date: 10/02/2008 3:25:51 PM

I vote and I do not like the exploitation of the environment for the benefit of humanity.

Stop shipping from killing creatures in the Stellwagen Bank. A nature preserve is supposed to allow fish/shellfish stocks to recover. If you support fishing and are any kind of feeling person, keep industrial shipping out of Stellwagen, allow the bait and groundfish to recover, stop hitting/killing whales, and do something that you can be proud of instead of selling out to the commercial interests!

John Chapin
72 Elm Street
Holliston, MA 01746

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: sbplan/comment]
Date: 10/02/2008 11:23:27 AM

----- Original Message -----

Subject: sbplan/comment
Date: Wed, 01 Oct 2008 18:53:11 -0400
From: Hedges Inc. <hedgesinc@comcast.net>
To: Stellwagen@noaa.gov

Dear Sir or Madame,

I was impressed with the public meeting I attended last week at Jones River. Ben Haskell provided a very useful overview of Stellwagen Bank and the promising future of the habitat.

As someone who uses the bank to tunafish for sport (45-55) times a year I am very interested in keeping this fishery open and thriving. I understand the pressure humans can put on wildlife in the ocean, as do most fishermen. But, I know the respect myself and others who fish pay to this area.

I expect to enjoy this wonderful resource of fishing for tuna with my son (who is 4) and my son's son.

Good luck and remember that fishermen are great stewards of the sea.

Kindly,

Chad Frost

78 Alden St.
Duxbury, MA
02332

781-934-2001

From: David Dow <ddow@cape.com>
To: sbplan@noaa.gov
Subject: Fwd: Stellwagen Bank National Marine Draft Management Plan and EAComments
Date: 10/02/2008 7:16:37 AM

> Comments on Stellwagen Bank National Marine Sanctuary's Draft
> Management Plan and Environmental Assessment (MP?)

The Cape and the Islands Group- Sierra Club (CC)?
assessment of the Stellwagen Bank National Marine Sanctuary's (SBNMS) draft Management Plan and Environmental Assessment that some of the sanctuaries key biological resources are in trouble from human activities (especially fishing, ship traffic, whale watching and climate change). Thus our comments will concentrate on the threats to fish populations (target and non-target)/ marine mammals (especially North Atlantic right whales) and their supporting habitats. Portions of the SBNMS are critical habitat for the North Atlantic right whale and other whales listed under the Endangered Species Act (ESA). Many of these whale populations are listed as strategic stocks under the Marine Mammal Protection Act (MMPA), so that human impacts are a pervasive problem for recovery of many whale species. Thus it is critical to protect the pelagic habitats that these whales occupy, especially zooplankton prey (*Calanus finmarchicus*) populations for right whales (and other planktivores) and Atlantic herring for humpback whales (and other piscivores). Forage prey species, such as Atlantic herring, are important for many fish populations, marine mammals and seabirds, so that we have concerns about the directed fishery for this species in the emerging Fishery Management Plan (FMP).

Many demersal fish populations depend upon benthic essential fish habitat (EFH) for food, shelter and reproduction, so that we have have a concern about the impacts of mobile fishing gear on EFH. In addition, there is excess commercial and recreational harvesting of many of the target fish/shellfish species; bycatch of non-target species which diminishes the ecological integrity of the wider ecosystem and incidental mortality of marine mammals and sea turtles by static fishing gear. The CC?

Massachusetts Chapter- Sierra Club will submit separate comments on protected species issues, especially North Atlantic right whale protection. It is possible that the Sierra Club's national Marine Wildlife ? whales as well.

The CC?
gear on benthic EFH and approaches for reducing the impacts of static fishing gear, ship strikes and whale watching on whale populations. We feel that the National Oceanic and Atmospheric Administration (NOAA) needs to better coordinate the role of NOAA Fisheries in managing

fish/shellfish and protected species (marine mammals and sea turtles) with the role of the National Ocean Service (NOS) in protecting the biological resources within the SBNMS which have been impacted by human activities for which NOAA has management responsibility (Interagency Coordination Action Plan). Given the move towards an ecosystem approach to management (EAM) and the designation of spatial management zones with special regulations as part of this process, we feel that the SBNMS needs to fall in this category if it is to meet its mandate to protect the living marine, protected and natural trust resources within its boundaries. We are disappointed that there is no action plan to address natural trust resources (i.e. seabirds at al.) within the Management Plan, even though they are mentioned in the Environmental Assessment. Many of our members have strong interests in conserving shorebirds and seabirds, so that we would like to see greater acknowledgement of this issue in the document. An ocean zoning approach is needed within the SBNMS in order to allow compatible human activities with the protection of the biological resources, but the Compatibility Determination Action Plan provides no information on this topic. We stand ready to help in elaborating this action plan.

>

> Effects of Fishing on the Biotic Resources and Habitats within the
> SBNMS:

> The Cape Cod and the Islands Group- Sierra Club agrees with the
> conclusion in the draft SBNMS draft Management Plan and Environmental
> Assessment (MP)?
> harvesting have impacted the biotic resources and habitats within the
> sanctuary's boundaries. Even though the Sierra Club supported the
> original compromise that allowed commercial and recreational fishing
> within the newly designated sanctuary, we feel that in light of its
> adverse impacts that some constraints need to be placed on where this
> activity occurs and that the overall harvest level needs to be
> reduced. We envision using the SBNMS and adjacent western Gulf of
> Maine Closed Area (WGoM CA) as test areas to examine the effects of
> mobile fishing gear on Essential Fish Habitat (EFH) and the role of
> incidental catch of non-target fish species, plus the static fishing
> gear impacts on bycatch of protected species (marine mammals)/natural
> trust resources (seabirds). This proposal would require cooperation
> between NOAA Fisheries and the National Ocean Service (which oversees
> the SBNMS) which haven't always shared the same management visions for
> this special place. This section will focus on the direct and indirect
> effects of fisheries harvesting on the target species, their prey and
> EFH.
>
> We advocate the use of a significant portion of the WGoM CA (that
> overlaps boundaries of SBNMS) as a no take Marine Protected Area
> (MPA). This MPA would serve as the natural baseline to examine fishing
> impacts from zoned fishing gear areas (mobile and static) within the
> SBNMS, where different areas would be set aside for different types of
> commercial and recreational fishing activities. Using realistically

> sized zones for different fishing gears within the SBNMS and
> comparing this to the WGOM CA MPA would allow the National Oceanic and
> Atmospheric Administration (NOAA) to develop management regulations
> that would promote sustainable fisheries, while at the same time
> protecting the biotic resources and habitats (pelagic and benthic)
> within the SBNMS. This approach is consistent with the Massachusetts
> Chapter's Sustainable Fisheries Policy and that developed at the
> national level by the Marine Wildlife ?
> Group helped develop the Chapter's Sustainable Fisheries Policy in the
> mid- 1990's, so that we have had a long term interest in this issue.
> This would be consistent with the recent call (Grafton et al., 2008)
> by fisheries scientists to move towards sustainability in managing
> fisheries. The SBNMS needs to ensure biodiversity, ecosystem
> integrity, societal amenities and sustainable uses of biotic resources
> which will require changes in governance and management institutions.
> There needs to be better balance between the protection of public
> resources and private benefits within the SBNMS boundaries.
>
> This suggestion would support concepts advanced in the MP?
> Compatibility and Ecosystem Protection Action Plans. The Compatibility
> Action Plan would greatly benefit from the applied research/ecosystem
> monitoring/modelling concept briefly described above for a new ocean
> zoning approach. All of these scientific components would be required
> to support an adaptive management program required to allow
> sustainable fishing, while protecting the the SBNMS's biotic resources
> and habitats. The Ecosystem Protection Action Plan addresses
> ecosystem-based management (EbM) and ecosystem alteration which would
> require cooperation by NOAA Fisheries and NOAA NOS. NOAA Fisheries has
> management responsibilities for fisheries harvesting; protection of
> marine mammals and sea turtles and natural trust resources (sea
> birds). The Canadian Eastern Scotian Shelf Integrated Management
> (ESSIM) plan provides a good example of the required framework
> (Rutherford et al., 2005) that should be pursued within the GoM/SBNMS
> ecosystem between different components of NOAA and other
> federal/state management entities.
>
> The Northeast Fisheries Science Center's (NEFSC) fishery independent
> Bottom Trawl Survey (BTS) with its fish stomach data base provide a
> useful long term database on the distribution/abundance of target fish
> species and their prey (finfish and invertebrates). There is no long
> term monitoring program for the benthic components of EFH (other than
> prey species), while the ecosystem monitoring program for pelagic
> habitats is much more limited than its demersal fish counterpart. More
> process oriented research is required to link fish production to the
> functional properties of pelagic and benthic EFH. There is a need for
> the SBNMS management and that at the NOAA Fisheries Northeast Regional
> Office (NERO) to better coordinate their scientific
> monitoring/research programs with management objectives to protect and
> conserve biological diversity and habitats both within the SBNMS and
> in the wider Gulf of Maine/Georges Bank ecosystem (GoM/GB). NOAA needs
> to develop an integrated ecosystem assessment of the wider GoM system,

> similar to the one done on the Eastern Scotian Shelf to support ESSIM
> (Choi et al., 2005). NOAA needs to view the SBNMS as a component of
> the wider GoM/GB seascape and manage this from a landscape ecological
> framework, rather than by mandates based upon the MSFCMA
> (Magnuson-Stevens Fishery Conservation and Management Act), ESA
> (Endangered Species Act), MMPA (Marine Mammal Protection Act), etc.
> This would entail better coordination of research and management, plus
> a more effective constituent involvement program to resolve potential
> multi-user, multi-sector conflicts.
>
> Additional monitoring is required on the distribution/abundance of sea
> birds and their pelagic habitat requirements. This would require
> cooperation between NOAA Fisheries and NOS. Since forage fish species
> (menhaden, Atlantic herring, Atlantic mackerel, sand eels, etc.) are
> important in the bottom up trophic coupling between the plankton and
> fish, marine mammals and sea birds, this component would benefit from
> a more comprehensive ecosystem-based monitoring program; associated
> process oriented research and modelling (Read and Brownstein, 2003).
> Academic scientists and those within NOAA Fisheries have developed
> network modelling approaches (Ecopath and EcoNetwrk) that allow one to
> incorporate bottom up trophic components into the management advice
> provided in the stock assessment process. Multispecies VPAs allow
> predator-prey interactions to be incorporated into management advice.
> New modeling approaches need to be developed to incorporate advice on
> the impacts of fisheries harvesting on EFH and biological diversity of
> other components of the marine ecosystem. The New England Fishery
> Management Council (NEFMC) development of the second Omnibus Habitat
> Amendment for the Council's 27 managed species offers an opportunity
> to examine the effects of mobile fishing gear on EFH and
> direct/indirect impacts of fishing on biodiversity (from genetics to
> populations/communities).
>
> The SBNMS needs to operationally define "ecosystem integrity" and
> their "compatibility" guidelines in order to develop an adaptive
> management approach for protecting the biotic resources and habitat
> within the sanctuary's boundaries. This implies that NOAA Fisheries
> and NOS have to cooperate more efficiently than has been the case in
> the past in order to have an integrated management effort both within
> the sanctuary and in the wider GoM/GB ecosystem (since what happens
> outside the sanctuary provides the context for what occurs inside).
> Sometimes conflicts arise between the mandates for managing the SBNMS
> and those under which NOAA Fisheries operates. Since NOAA Fisheries is
> moving towards an ecosystem approach for management (EAM) which
> features place-based rule making, it may be necessary to consider
> separate rules for the SBNMS to encompass its mandates under the NMS
> Act. As mentioned earlier the Canadian ESSIM initiative can be used
> for lessons learned on how to pursue an integrated management approach
> for multisector uses and coordinate the activities of diverse
> constituents (Choi et al., 2005; Rutherford et al., 2005). It took a
> many years to implement ESSIM, so that in our view NOAA has a long way
> to go for implementing an EAM for the SBNMS and the surrounding GoM

> ecosystem.

>

> One final point is that climate change in the marine environment from human activities is likely to exacerbate the future effects associated with fisheries harvesting. Given the fish community changes in Narragansett Bay (Collie et al., 2008), climate change (natural and human-induced) effects have become apparent for inshore ecosystems. It is likely that the distribution of forage fish species will show either seasonal or annual shifts in the foci of distribution/abundance on the Northeast Continental Shelf, which implies that new efforts will be required in monitoring, process oriented research and modeling to understand how climate change interacts with the direct/indirect impacts from fishing. These changes may exacerbate the fisheries harvesting induced regime shift in the northwest Atlantic ecosystem from demersal to pelagic-dominated fish community plus increased invertebrates (Choi et al., 2005). This might also include the need to better understand the effects of eutrophication in coastal waters and the MWRA (Massachusetts Water Resources Authority) outfall pipe's water quality impacts on the SBNMS biotic resources and habitat. The SBNMS MP?

> background on the multiple human threats facing the sanctuary resources and the Action Plans offer some solutions.

>

> The SBNMS lies along the gradient between coastal waters, continental shelf and off shelf water masses and these all interact to influence what happens with the sanctuary's boundaries. This has to be viewed as an integrated physical, chemical and biological system from both the science side and the resultant management actions. The two ocean commissions (Pew and U.S.) emphasized this need, but the federal government has not implemented this perspective either scientifically or in management. The Sierra Club favors using regional coastal commissions to integrate local/state/federal management actions.

> Potential management models include the California Commission or Gulf of Maine Council on the Marine Environment. On the scientific side the Gulf of Maine Ocean Observing System (GoMOOS) might offer a useful model. We face a future in which multiple human stressors will impact the SBNMS resources and these will emanate from local, state and federal jurisdictional units. Since all three levels of government face severe constraints on financial and personnel resources, there is a need to prioritize the activities required to address the problems highlighted in the SBNMS MP?

> document has made a good start in this prioritization.

>

> Bibliography:

> Choi, J.S., K.T. Frank, B.D. Petrie, and W.G. Leggett. 2005. Integrated assessment of a large marine ecosystem: a case study of the devolution of the eastern Scotian Shelf, Canada. *Oceaogaphy* ? *Biology Annu. Rev.* 43: 47-67.

>

> Collie, J.S., A.D. Wood, and H.P. Jeffries. 2008. Long-term shifts in the species composition of a coastal fish community. *Can. J. Fish.*

> Aquat. Sci. 65: 1352-1365.
>
> Grafton, R.Q., R. Hilborn, et al. 2008. Positioning fisheries in a
> changing world. Marine Policy 32: 630-634.
>
> Read, A.J. and C.R. Brownstein. 2003. Considering other consumers:
> Fisheries, predators, and Atlantic herring in the Gulf of Maine.
> Ecology ? art. 2; 11 p.
>
> Rutherford, R.J., G.J. Herbert and S.S. Coffen-Smout. 2005.
> Integrated ocean management and the collaborative planning process:
> the Eastern Scotian Shelf Integrated Management (ESSIM) initiative.
> Marine Policy 29: 75-83

Thanks for considering our comments and proposed suggestions for improvement in this document.

Dr. David Dow
Treasurer, Cape Cod ?
18 Treetop Lane
East Falmouth, Ma. 02536-4814
Phone: 508-540-7142
Email: ddow@cape.com
>

From: Madeleine Hall-Arber <arber@MIT.EDU>
To: sbplan@noaa.gov
Subject: Comments on Stellwagen Bank draft management plan
Date: 10/01/2008 7:23:18 PM

Dear Dr. MacDonald,

In the last 20 years, there has been a world-wide growth in “protected areas.” As West et al. (2006:255) pointed out, protected areas have become the way “many people see, understand, experience, and use the parts of the world that are often called nature and the environment.” This has imposed a nature/culture dichotomy that sets up protected areas as “just, moral, and right.” In the terrestrial setting, numerous governments have established protected lands that separate people from their surroundings and present the ecological effects of human activities (i.e., culture) as unnatural (West et. al 2006:256). In some cases, the imposition of this dichotomy has led to the resistance of local people to the creation of protected areas. What you may wonder, does this have to do with the Stellwagen Ban National Marine Sanctuary’s Draft Management Plan?

In reading the management plan, I was struck by the “competing cultural constructions that assert resource rights and environmental entitlements,” (Moore 1998:379). The language used in the draft seemed calculated to place the customary human use of Stellwagen into a category of the unjust and immoral, and certainly, not right. Yet the photographs and documentation of the wonderful diversity of wildlife in the sanctuary and history of its use suggests a more accurate depiction would be of coexistence.

The fifth annual World Parks Congress’s action plan noted the connection between protected areas and dispossession, poverty, cultural change, social and subsistence losses to the people who had previously used the land. Protected area creation commonly restricts access and use by rural people through legislation, enforcement and privatization. The small boat owners who live along the south shore of Massachusetts will surely feel a strong kinship with indigenous peoples displaced by protected areas if they are banned from fishing on Stellwagen. This displacement would be particularly galling to the fishing industry that helped promote designation of the marine sanctuary with the understanding that fishing would continue to be permitted.

Protected areas also frequently fuel social conflict between groups, particularly when top-down approaches disrupt customary land-tenure systems that alter local community dynamics (West et al.2006:259). Stellwagen Bank, also known as Middle Bank, has been successfully fished for hundreds of years. Research looking at the last three decades has documented the long-term importance of the Bank to both recreational and commercial inshore fishermen of Massachusetts (Hall-Arber et al. 2007). Nevertheless, restricted days-at-sea, larger mesh sizes, more selective gear, limited access permits, and closed areas have, without a doubt, diminished impacts of commercial fishing on Stellwagen. With its mandate to halt any overfishing and to balance the nation’s needs, the New England Fishery Management Council is the proper agency to oversee the management of fishing. If Stellwagen Bank managers and other stakeholders are seriously concerned about particular fishing operations in the sanctuary, they are free to participate in public discussion and comment on proposed management plans. Management plans should be designed with a broad constituency and variety of interests represented, but also need to consider social and economic impacts (immediate and cumulative).

Schultz and Zelezny (1999) argue that effective environmental policies depend on understanding the values and motives behind people’s environmental concern and behavior. These values and motives may well be complex, ranging from the tangible (livelihood) to such intangibles as aesthetics, peace, identity,

educational, etc. To develop environmental policies that will benefit local people, communities, as well as the region and nation, a broader understanding of what and why people feel the way they do about Stellwagen is needed. Parroted sound bites generated by particular interest groups should be weighed carefully so that the process is not distorted.

Other researchers (e.g., Ross and Medin 2005) note, “culture may produce different ‘habits of the mind’ that have consequences for people’s conceptualization of nature,” creating different “interpretations of experience and attention to various aspects of nature.” In the 25 years or so that I have been working in fishing communities, I have witnessed a change in attitude towards the environment and marine ecosystem, specifically a recognition that certain areas or species need protection. Most fishermen are strong advocates for sustainability—the difference between the fishermen and some of the scientists who demand the cessation of fishing is that the fishermen advocate for the sustainability of both fish and fishing communities!

Other researchers make a similar point that the values associated with landscapes are the result of a social process. Stellwagen Bank may be highly valued precisely because it has been a source of sustenance, subsistence, and even wealth in some cases, to many generations of fishing families and communities, as well as other human users of the area. A gentle warning in popular culture says to, “be careful of what you wish for.” As commercial fishing has been slowly removed from large swaths of our coasts, the voice for protection of the coastal ecosystem has grown weaker, out-shouted by demands for cheap energy. Is it a coincidence that the ban on offshore drilling has not been renewed?

Before closing, I do want to add that the tremendous amount of work that has gone into the draft management plan for the sanctuary is very impressive. The challenges of managing this area are clear. I caution, however, against banning those who may be as vulnerable to extinction as any of the non-human species who utilize the sanctuary.

Regards,

Madeleine Hall-Arber
Anthropologist

References:

Hall-Arber, Madeleine, Rhonda Ryznar, David Bergeron, Judith Pederson, Christiaan Adams. 2007. Charting Anecdotal Information and Oral Histories on Stellwagen Bank from Local Commercial Fishermen. Final report.

Moore, D.S. 1998. Clear waters and muddied histories: environmental history and politics of community in Zimbabwe’s eastern highlands. *Journal of Southern African Studies* 24(2): 377-404.

Ross, Norbert and Douglas Medin. 2005. *Ethnography and Experiments: Cultural Models and Expertise Effects Elicited with Experimental Research Techniques*.

Schultz, P.W. and L. Zelezny. 1999. Values as Predictors of Environmental Attitudes: Evidence for Consistency Across 14 Countries. *Journal of Environmental Psychology*. 19:255-265.

West, Paige, James Igoe, and Dan Brockington. 2006. Parks and Peoples: The Social Impact of Protected Areas. *Annual Review of Anthropology* 35:251-77.

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: PUBLIC COMMENTS ON SBNMS's DRAFT MANAGEMENT PLAN]
Date: 10/01/2008 4:18:20 PM

----- Original Message -----

Subject: PUBLIC COMMENTS ON SBNMS's DRAFT
MANAGEMENT PLAN
Date: Tue, 30 Sep 2008 18:32:15 +0100
From: Erich Hoyt <erich.hoyt@mac.com>
To: Craig.MacDonald@noaa.gov
CC: Elizabeth.Stokes@noaa.gov

PUBLIC COMMENTS ON SBNMS's DRAFT MANAGEMENT PLAN

Dear Dr. MacDonald,

I would like to offer a few comments on the Draft Management Plan for Stellwagen Bank National Marine Sanctuary.

I am familiar with Stellwagen Bank, having gone out whale watching and on research trips numerous times especially in the 1980s and early 1990s. Since 1992 I have been working on marine protected areas and critical habitat issues for the Whale and Dolphin Conservation Society. I have served as Invited Expert to the ACCOBAMS Scientific Committee and helped to organize MPA workshops within ACCOBAMS meetings and at the European Cetacean Society (last year), among many other meetings. I am co-chairing a workshop on Mediterranean MPAs at this year's IUCN WCC in Barcelona. My book MARINE PROTECTED AREAS FOR WHALES, DOLPHINS & PORPOISES (Earthscan, London, 2005, 516pp) is in the process of going to a 2nd Edition later in 2009. I am currently preparing the revision and will include updated information on SBNMS. I have also written extensively on whale watching, including the report Whale Watching 2001 (IFAW, 156pp) as well as various papers.

As you know, research has shown that Stellwagen Bank National Marine Sanctuary (SBNMS) provides critical support for the endangered North Atlantic humpback whale population as an important feeding and nursery grounds. Just as important, SBNMS serves as a critical forage base for the most vulnerable segment of the humpback population, specifically mothers and weaning calves, and pregnant and lactating females. Mainly for this reason, I believe that it is important to implement a permanent ban on the exploitation of sand lance in the sanctuary (Ecosystem Alternation Action Plan 3.3.1). This should be an integral part of ecosystem-based management both in sanctuaries and throughout the North Atlantic.

In addition, I would suggest 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.

I would also like to bring up the idea of boundary expansion and zoning. All of Jeffreys Ledge would be a logical expansion of the sanctuary, as has been suggested in the past. Just as important is the introduction of zoning of uses. Much could be said about this, but as a starting point, the next plan should identify and ZONE (permanently 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 assessing fishery impacts and potential fishery management actions in other areas.

I would also encourage you to continue your pioneering acoustic and behavioral work on humpback whales which will continue to inform management and lead to improved outcomes. I would encourage you to adopt 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 and pertaining to whale watching, commercial fishing, and vessel traffic.

Humpback whales are of international significance. Your recent establishment of the sister sanctuary between SBNMS and the Dominican Republic's Marine Mammal Sanctuary could well serve as a model for an ecosystem-based framework for management. In this way, the arrangement could be more than on paper and in fact could contribute to humpback whale recovery in the North Atlantic.

Thank you for this chance to comment.

Sincerely yours,

Erich Hoyt

Senior Research Fellow, WDCS, the Whale and Dolphin Conservation Society
Programme Leader, Critical Habitat / MPAs, WDCS
Co-director, Far East Russia Orca Project
Member, IUCN/SSC Cetacean Specialist Group

29A Dirleton Avenue
North Berwick, Scotland EH39 4BE
Email: erich.hoyt@mac.com

www.wdcs.org
www.whales.org
www.cetaceanhabitat.org

From: ussdpv@juno.com <ussdpv@juno.com>
To: sbplan@noaa.gov, ussdpv@juno.com
Subject: My Comments to the Plan
Date: 10/01/2008 3:35:56 PM

What I said at Gordan

5 Paul Blanchette.

6 MR. BLANCHETTE: My name is Paul

7 Blanchette from Dracut, MA. I'm also here from the
8 diving community. The plan right now is not
9 specific enough and needs much more definition. No
10 one is asking for a blank check, and as a taxpayer
11 I'm not agreeing with that at all. They're asking
12 for way too much. We're looking for no permitting
13 on the diving regulations in the marine sanctuary.

14 People have had a lot of problems with

15 NOAA in the Monitor Marine Sanctuary. I for one was
16 able to dive the Monitor last year, and it was just
17 out of luck I got in on a permit that was being run
18 down there, and the permits are extremely difficult
19 to get. Very poorly managed. Their permitting
20 process is not defined. It's not clear. People are
21 being turned down for permits and they don't know
22 why.

23 If there is going to be issues with

0006

1 diving in the marine sanctuary, the NOAA group needs
2 to work on putting in moorings and defining the
3 moorings, ask the diving community to vote on where
4 to put moorings. We'll help you with the
5 information. We're here. A lot of people here

Page 2

060908 - vol. I.txt

6 today are from the diving community to talk about
7 this stuff.

8 There is trash on the wrecks. I know

9 on the Monitor we picked up trash on one of our
10 dives. There is fishing lines on the wrecks.
11 Again, the applications to get the permits for the
12 wrecks are not clearly defined. I feel that the
13 Marine Sanctuary should be handled the same as the
14 National Park Service does. You should be able to
15 walk in, get a permit, pay a fee, tell the ranger or
16 whoever is in charge you're going out, going to
17 enjoy the park for the day, come back the same day,
18 whatever. It shouldn't be all the letters and
19 correspondence we have with NOAA now, and you don't
20 even hear back from them to understand whether you
21 got a permit or don't have a permit.

22 The Monitor has failed miserably, and I
23 don't see what is going on up here is a very
0007

1 exciting thing at all. I think it's going to be
2 very damaging to the community. Thanks Paul

From: Bjdurk@aol.com
To: sbplan@noaa.gov
Subject: Stellwagen Bank Draft Management Plan comments Barbara Durkin
Date: 10/01/2008 3:26:24 PM

October 1, 2008

Stellwagen Bank National Marine Sanctuary

175 Edward Foster Rd
Scituate, MA 02066

RE: Comments on the Stellwagen Draft Management Plan

Dear Dr. MacDonald:

I respectfully request that you consider my comments on the Stellwagen Bank Draft Management Plan that I continue to review. I was in attendance on May 6, 2008 at the Sanctuary Advisory Council Meeting held in Boston at the Children's Museum that focused on the release of the Draft Management Plan. I have also participated as a private citizen at the related public hearings held on June 5, 2008 in Portland, ME; and on June 12, in Hyannis MA.

My main concern is in regard to the presentation of facts in manner(s) that suggest to me that heritage fishing trades are threatened under the auspices of best management practices.

I have a very deep reverence for cultural legacy and heritage trades ongoing at Stellwagen Bank. And, I have profound appreciation for the historic and intimate relationship that exists between man and the bountiful sea. This relationship has sustained extended communities for untold centuries. And, if this relationship is severed, there will be no harvest upon which we depend as once did our ancestors. Fishing communities in turn rely upon our consumption of the food that they catch; so shall they be set asunder by bad policy that threatens all of us.

The fishing industry and their communities need our help, not hindrance. Regulations have helped to sustain fisheries, while it is counterintuitive, if not sinful, to require fishermen to toss thousands of pounds of fish, by-catch, away, under self-defeating regulations that are poorly considered. I would ask that you address this travesty that punctuates the need for good science and policy to form the foundation for sustainable fisheries that I implore you to help protect.

I have selected excepts of the Stellwagen Bank Draft management plan, (and other sources), that emphasize the significant importance of fishing as a heritage trade.

Evidence of a symbiotic reliance on the amphibious cultural resource of Stellwagen Bank throughout history is provided for your consideration.

Please note that, “The primary commercial use of the Bank's resources is fishing, which has occurred in the area for several generations.”

I ask that you please assist in the protection of heritage trades, traditional cultural practices, fishing communities; and the public that depends upon the food source delivered to us by these noble tradesmen and women of the fishing industry.

Most Respectfully,

Barbara Durkin

48 Moore Lane

Northboro, MA 01532

Telephone: (508) 612-4133

“Whatever long time has sanctioned,

that is a law forever;

the law tradition makes

is the law of nature.”

Euripide

(485?-406 B.C.)

“People are joined to the land by work. Land, work, people, and community are all comprehended in the idea of culture.”

Wendell Henry (1934)

<http://stellwagen.noaa.gov/maritime/maritimehistory.html>

"It is likely that between 11,000 and 12,000 years ago, Paleoindians inhabited these areas and exploited the rich marine resources found along the shore."

"Bounty of the Sea"

"For over 400 years, Massachusetts Bay has been a center for fishing activities. The area was first fished by Native Americans who collected a variety of marine foods along the water's edge. During the colonial period, fish played a large role as one of the region's main export commodities. The Pilgrims came to Plimoth colony with the intention of fishing, and many 17th century towns grew and prospered from this industry. As technology progressed, fishing vessels and fishing methods evolved to meet the demands of the market. The small rowed craft of the colonial period were replaced by swift schooners in the 18th and 19th century which were then replaced by engine driven trawlers in the 20th century. Today, fishermen travel from their home ports for Stellwagen Bank to harvest finfish and shellfish."

Fishermen used hand lines to catch cod.

Courtesy of the Library of Congress.

"History of Fishing on Stellwagen Bank"

"In the 20th century, with the "growth of the trawler and dragger industries," attention turned once more to Stellwagen as a site for modest-scale commercial fishing (Mastone 1990: 18). In the late 1980's, an annual average of 16.2 million pounds of fish was harvested on the bank, with approximately \$12.5 million dollars of value annually (Pett and McKay 1990: 41). The most valuable species included bluefin tuna, cod, yellowtail flounder, and pollock, although dogfish, whiting, cod, and pollock dominate in terms of total poundage landed(Pett and McKay 1990:41)."

<http://stellwagen.noaa.gov/about/sitereport/fishing.html>

"The sanctuary's overall mission is to conserve, protect and enhance the biodiversity, ecological integrity and cultural legacy of the sanctuary while allowing uses compatible with resource protection."

<http://pressherald.mainetoday.com/specialrpts/shipbuilding/story.html?ID=1518>

Stellwagen Bank Final EIS and Management Plan

http://www.archive.org/stream/stellwagenbankna01unit/stellwagenbankna01unit_djvu.txt

Page 4:

PART ONE: INTRODUCTION

decisionmaking in national marine sanctuaries;

A. Authority for Designation

“National marine sanctuaries are built around the existence of distinctive natural and cultural resources whose protection and beneficial use require comprehensive planning and management.”

http://www.archive.org/stream/stellwagenbankna01unit/stellwagenbankna01unit_djvu.txt

F. Purpose and Need for Designation

“The primary commercial use of the Bank's resources is fishing, which has occurred in the area for several generations.”

2. Regional Access

“Resources of the Stellwagen Bank area have traditionally supported an active commercial fishing industry, which reaches the Bank's fishing grounds primarily from Gloucester (approximately 12 miles northwest of the north end of the Bank), and Provincetown (approximately 6 miles south of the southern end of the Bank) (Figure 2). Additional fishing ports using the area include Boston, Chatham, New Bedford, Plymouth, Scituate, Hyannis, Fall River, Manomet, Falmouth, Wellfleet, Barnstable, Beverly, Salem, Ipswich, Rockport, Dartmouth, Westport, Fairhaven, Cuttyhunk, Duxbury, and Onset. Out-of-state fishing vessels also visit the Bank area from New Hampshire

(primarily Portsmouth), Maine, and (less frequently) Connecticut. Currently, there are approximately 280 commercial fishing vessels fishing regularly in the Stellwagen Bank region. (Kellogg, 1990)."

Pages 23, and 24:

"Many of the identified Gulf of Maine species have been traditionally important commercially, and continue to provide an important economic resource to the New England region. Commercially important species include" [cut]

Stellwagen Bank Final EIS and Management Plan

Page 36

"Further, fishing vessels utilized the study area not only as a fishing ground but also as the route to major fishing grounds on Georges Bank and the Great South Channel.

Historical fisheries and whaling activities of this region are well established. It is clear that near shore fisheries (including whaling from long boats) encompassed Stellwagen Bank (Stuart Frank, pers. comm., 1990). It was the shift from smaller vessels to the schooners which moved the majority of fisheries further offshore to areas such as Georges Bank, Great South Channel, and Grand Bank.

Nearshore fisheries were typically restricted to a few small open boats engaged in market fisheries almost exclusively in the winter months up to the Civil War (Collins, 1890). It appears that Stellwagen Bank was not heavily exploited by the schooner-based fisheries because Georges Bank was more lucrative (Collins, 1889). Growth of the trawler and dragger fishing industries focused attention back to Stellwagen Bank in this century.”

Page 38

C. Human Activities

1. Commercial Fishing

a. Regional History

“Historically, the most economically important human activity directly dependent on the resources of the entire Gulf of Maine, including Stellwagen Bank, has been commercial fishing. The yield from groundfish, invertebrate, and pelagic fisheries has been the most important commercial resource available throughout the New England region since the time of early Colonists. This traditional activity continues today as an important source of revenue to the New England coastal states.”

D. . Fisheries Management

“Most commercial and recreational fishing activities in the Stellwagen Bank area are regulated by fishery management plans (FMPs) developed by Fishery Management Councils. FMPs recognize the inseparable association between fishery resources and the commercial/recreational interests dependent upon them. The goal of FMPs is to preserve the fishery resource, through implementation of a management scheme which provides operational flexibility, encourages efficiency and lessens regulatory mechanisms.

Depending upon the particular target species, Stellwagen Bank fisheries are managed by the New England Fishery Management Council (NEFMC), and/or the Mid-Atlantic Fishery Management Council (MAFMC), pursuant to the provisions of the Magnuson Fishery Conservation and Management Act (16 U.S.C. § 1801) (FCMA).

Section 303 of the FCMA requires that FMPs contain conservation and management measures; assessment of present condition of the fishery and

its maximum sustainable yields; the capacity and extent of fishing vessel harvest of the fishery; and information on the significance of the habitat of the fishery. Owing to the seasonal variability of specific species, the two Fishery Management Councils make recommendations to each other when additional information is required.

Once an FMP is approved by the Secretary of Commerce, implementation of its provisions is the responsibility of the National Marine Fisheries Service (NMFS), the U.S. Coast Guard (USCG), and an FMP Technical Monitoring Group.”

Supplemental information:

Marine Reserve Networks Key to Protecting Oceans

<http://www.ens-newswire.com/ens/jan2003/2003-01-14-10.asp>

Leon Panetta chairs the Pew Oceans Commission (Photo courtesy [Coastal America](#))

“The United States has long appreciated the value and benefits of preserving and protecting the land, said Leon Panetta, chair of the Pew Oceans Commission, but is only just beginning to apply that same conservation ethic to the oceans.

The report finds that the area protected in state and federal parks is more than 100 times what is protected within marine reserves.

“The oceans are a public trust and need our protection,” Panetta said. “Setting aside parts of the ocean as marine reserves, based on science and the public’s involvement, is an essential part of a comprehensive approach to ocean management.”

In addition to Panetta, former White House chief of staff under President Bill Clinton, the commission consists of 17 members with a broad range of interests.

The commission includes John Adams, the founder of the Natural Resources Defense Council; Mike Hayden, the former president and CEO of the American Sportfishing Association; as well as New York Governor George Pataki, and Kathryn Sullivan, the first American woman to walk in space. Other commissioners come from the commercial fishing industry, from research and academia as well as from conservation groups...

"Our goal is to restore and maintain marine ecosystems, and preserve our fishing heritage," Panetta said. "Congress and the nation have the opportunity to build a better future for the oceans and those who depend on them for their livelihood."

...Obstructing this goal is Conservation Law Foundation that condemns fishing, a heritage trade; and past, present and hopeful future livelihood.

And, for this public lobbying effort, CLF should be condemned:

<https://secure2.convio.net/clf/site/Advocacy?JServSessionId=009=4iur831ai1.app45b&cmd=display&page=UserAction&id=147>

"Help Make Stellwagen Bank a REAL Marine Sanctuary!"

"Stellwagen Bank National Marine Sanctuary is one of New England's great ocean treasures and home to an abundance of whales, turtles, seabirds, fish and other ocean wildlife. But the Sanctuary is in trouble and suffers from relentless degradation of ocean habitat and marine life caused by destructive fishing practices, commercial shipping traffic and encroaching ocean development.

Now, a proposed new management plan gives us a real opportunity to make Stellwagen Bank National Marine Sanctuary live up to its name and provide a refuge to the ocean wildlife that it was designated to protect. You can help make Stellwagen Bank a true sanctuary. Please send a letter to Stellwagen Bank Sanctuary's managers today and urge them to protect all that this ocean refuge has to offer."

Click here to learn more.

1. Review the message on the right.
2. Complete the form below with your information.
3. Click the "Send Your Message" button to send your letter to these decision makers:
 - Your Senators
 - Your Representative
 - Craig McDonald

"Dear Superintendent MacDonald: [Decision Maker],

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of Stellwagen and the destructive impacts of human activities including bottom trawling and commercial

shipping. Today Stellwagen is a sanctuary in name only. The proposed management plan is woefully inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people.

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,

[Your Name]
[Your Address]
[City, State ZIP]”

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: Public Comment for SBNMS Management Plan]
Date: 10/01/2008 10:12:44 AM

----- Original Message -----

Subject: Public Comment for SBNMS Management Plan
Date: Wed, 01 Oct 2008 08:26:12 -0400
From: kim.beddall <kim.beddall@usa.net>
To: Craig.MacDonald@noaa.gov
CC: Elizabeth.Stokes@noaa.gov

Dear Dr. MacDonald,

As a life long conservationist and Secretary on the board of directors for the Samana Bay Boat Owners Association in the Dominican Republic; on behalf of our 26 members, I would like to offer the following comments on the Draft Management Plan for Stellwagen Bank National Marine Sanctuary.

The Stellwagen Bank National Marine Sanctuary (SBNMS) off the coast of Massachusetts, and the Santuario de Mamíferos Marinos de la República Dominicana (SMMRD?Marine Mammal Sanctuary of the Dominican Republic) are two marine protected areas, 1,500 miles apart, that provide critical habitat for the same group of approx. 900 humpback whales. These endangered humpbacks whales are resident at SBNMS's feeding and nursery grounds from April through December and migrate to the warm waters of the Dominican Republic to mate and calve during January, February and March, where they are the foundation for a sustainable tourism industry that is a vital part of this provinces economy. It is therefore crucial that both countries regulate to protect ?humpback whales" and their habitat on both ends of their annual migration.

SBNMS serves as a critical forage base for humpback whales, especially mothers and weaning calves, and pregnant and lactating females. We believe that it is imperative to implement a permanent ban on the exploitation of sand lance inside the Stellwagon Bank National Marine Sanctuary (Ecosystem Alternation Action Plan 3.3.1).

We also encourage you to continue your pioneering acoustic and behavioral work on humpback whales. The sister sanctuary agreement between SBNMS and SMMRD was designed to enhance coordination in management, research and education efforts between the two sanctuaries. Ecosystem-based management within both sanctuaries will provide an opportunity to answer important natural history questions, vital to informed management objectives in feeding and reproductive areas. Humpbacks whales are of national and international significance to both of our countries and therefore we must both do our parts to help ensure humpback whale recovery in the North Atlantic.

Thank you for the opportunity to comment.

Sincerely yours,

Kim Beddall,
Secretary,
Samana Bay Boat Owners Association,
Avenida Malecon,
Edificio 3, Apt. 1
Samana,
Dominican Republic.

Tel./Fax 1-809-538-2494

From: PAUL MCCARTHY <pfmcc@verizon.net>
To: sbplan@noaa.gov
Subject: Kudos to the work of the staff and volunteers at the GES
StellwagenBank National Marine Sanctuary
Date: 10/01/2008 9:56:28 AM

To whom it may concern:

I am writing to enthusiastically endorse the management plan as proposed. As a lifelong coastal resident with significant family ties to work and play along the Gulf of Maine and particularly Massachusetts and Cape Cod Bay I applaud the good work of the Marine Sanctuary program and staff in all of the efforts to preserve and protect this most important life sustaining and historical resource.

The Sanctuary folks deserve the highest of praise for their commitment to educate the public about this maritime treasure. Their lectures, outreach programs and publications are of the first rank. An educated and involved citizenry will keep our republic strong and healthy for generations to come. Please continue to keep up the great job you are doing.

Sincerely,

Paul F. McCarthy
9 Carolyn Circle
Marshfield, MA 02050
781-834-7863 - office
781-837-0953 - fax
pfmcc@verizon.net

From: Matt Rigney <mattrigney268@comcast.net>
To: sbplan@noaa.gov
Subject: Protect the Foundation of the Food Web in Stellwagen
Date: 09/30/2008 8:26:46 PM

Sep 30, 2008

Superintendent Craig MacDonald
175 Edward Foster Road
Scituate, MA 02066

Dear Superintendent MacDonald,

We have got to leave something for the fish and other marine life. I am writing you from Tokyo after having just visited Tsukiji Fish Market, the largest in the world, and while an impressive place, it also was a symbol of how voracious mankind is.

Do NOT develop a sand lance fishery for economic reasons. The "economics" will benefit a few human beings in the short term but will cost marine mammals and fish too much in the long term. The US has got to get away from a band-aid and patchwork approach to fisheries management. Leaving Stellwagen completely alone--including

the sand lance--will ensure that we take an approach of actually trying to bring back some species to robust levels.

Leave the sand lance alone and do not develop the fishery for it.

Thank you,

Mr. Matt Rigney
268 Shelburne Falls Rd
Conway, MA 01341-9633

From: Michael Ferro <harborbar@yahoo.com>
To: sbplan@noaa.gov
Subject: Draft Management Plan comment
Date: 09/30/2008 6:46:44 PM

Impose a strict limit on charter boats of 1 fish per/charter party member.

From: emcnamee@bu.edu
To: sbplan@noaa.gov
Subject: Draft Management Comments
Date: 09/30/2008 12:36:34 AM

Dear Superintendent McDonald,

Though the decades, society has looked towards the ocean for sustenance, transportation, and entertainment. Though now we know that these resources are not inexhaustible, we have yet to make many huge strides towards the conservation of something so important. Creating the Stellwagen Bank National Marine Sanctuary was an enormous step in protecting one of these places of great biodiversity, but just as the action plan states, there is still more to be done. Unfortunately, the action plan is lacking in some respects.

As a marine science major at Boston University, SBNMS is the closest and best place to study. This has given me an in depth look at the ecosystems that Stellwagen Bank encompasses. Though I am interested in all aspects of SBNMS, since my research is based on whales, they are my main concern.

I feel that the action plan does a very good job stating the problems surrounding whales including interactions with a variety of water vessels, aircrafts, and possible entanglements situations, yet I feel that one of the biggest problems pertains to their consumption of food. Though the Draft Management Plan recognizes that boats can be incredibly stressful towards whales, it overlooks some important consequences of boat activity. Humpback whales come up to Stellwagen Bank for one reason: to feed. If, while a humpback whale is feeding, a boat approaches, the whale will stop feeding to move away from the boat. Though considered normal behavior, this is unhealthy for the whale because it has left a large food source that was important for storing food for the winter and can be detrimental to their overall fitness. Though whale watching is a huge business in and around Stellwagen Bank, I feel that restricting boats from trailing whales would be a great way to ensure the health of the humpback whales.

While we always think of whales as being a pelagic species, we have to keep in mind that they do not remain at one place in the water column. Research performed at SBNMS has suggested that whales bottom feed, and therefore must be considered in the benthos ecosystem. Also, the project that I have been working on suggests that this type of bottom feeding is common mostly among juveniles, and is therefore very important in the development of humpback whales. Because much of the public is concerned about whales because of their massive size, yet almost unexplainable gracefulness, by adding them into the benthos ecosystem, the public's concern is shifted to something that is commonly overlooked.

Thank you for your time,
Elizabeth McNamee
emcnamee@bu.edu

From: rfdemarzo@aol.com
To: sbplan@noaa.gov
Subject: Stellwagen Bank draft management plan
Date: 09/29/2008 2:56:17 PM

I am opposed to any additional restrictions on recreational fisherman as part of any revisions to the management plan. The major impact on the fisheries is the Large commercial fisherman and the shipping lanes.

It is sad enough that the federal government may or will be imposing a licensing fee on saltwater fisherman without the revenue going towards marine issues.

Robert F. DeMarzo
Phone- 781-293-5456

Find phone numbers fast with the [New AOL Yellow Pages!](#)

From: Jeff Downing <diverjmd@hotmail.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary Comments
Date: 09/29/2008 9:23:29 AM

To whom it may concern,

I was lucky enough to grow-up on the north shore of Massachusetts. As a child, I spent countless hours recreational fishing with my father and neighbors in the Plum Island area. As I became a teenager, I worked on various small fishing boats. As I got older in college, I finally took the steps to become a certified scuba diver. Now 11 years later, I have progressed to advanced levels of training and I have obtained instructor credentials. Although I no longer reside on the north shore, I still frequent there often and still call New England my home. Now being a father, I wish for my children to be able to follow in my footsteps if they choose and appreciate the wonderful sport of scuba diving.

I have personally seen fishing stocks decline over the years. I remember back as a child watching schools of fish coming ashore on the beaches of Plum Island I know that no longer has. As a scuba diver, I have also seen depreciations in the amount of fish while being under the water. Although I have no opinion or recommendations as to what could help the fish populations, I do feel I have something to contribute when it comes to Stellwagen Bank National Marine Sanctuary and scuba diving.

As a scuba diver, we are able to explore the last frontier. We are able to explore places no other human has ever been. In today's world, that is extraordinary. There is a tremendous amount of history under our waters, especially in Stellwagen Bank. As a scuba diver, I have been privileged enough to dive on shipwrecks and to see first hand glimpses of history. I have been able to see shipwrecks 100 years old, that have real meaningful stories behind their demise. As a father, there is nothing more than I could want than for my children to be able to experience these same joys as I have. Unfortunately these shipwrecks I dive will not be in very good condition as my children grow up.

I believe we should preserve these shipwrecks as much as possible. However, unlike archaeological sites under the earth, our maritime shipwrecks are not able to be preserved. Unfortunately there is no government or known technological resources or control we can do to protect these shipwrecks from their biggest threat...mother nature. I cringed over this past weekend when hurricane warnings were posted for the eastern seaboard, knowing these mountainous seas would permanently damage our precious shipwrecks all along its path. These shipwrecks are also deteriorating on their own due to the destructive nature of the ocean. As shipwreck divers, we are able to clearly see the breakdown and destruction of these shipwrecks from year-to-year. These wrecks are collapsing upon themselves to forever become a part of the ocean. Any limitations placed on divers, we permanently remove anyone being able see these pieces of history forever.

As our technology grows, our shipwrecks are not reproduced at the same rate as they have been in history. As long as man travels via water, we will continue to have vessels sink, however they will never fall at the rates of the past. Our world has changed on the battlefield. No longer do our world nations fight their battles on the high seas, and no longer do people travel the oceans the way they have in the past. Even our cargo is flown more than it is shipped over the oceans.

Please keep these precious shipwrecks open to divers without any restrictions so those of us can see these pieces of history and share our experiences with the next generation because they will not be able to see what we can.

Thank you,
Jeffrey Downing
PO Box 119
Sunapee, NH 03782

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: Les Kaufman <lesk@bu.edu>
To: sbplan@noaa.gov
Subject: Comment on Draft Management Plan for Stellwagen Bank National Marine Sanctuary
Date: 09/26/2008 6:03:12 PM

Dear Colleagues and Fellow Citizens,

I wish to take this opportunity to comment on the SBNMS Draft Management Plan. I am a professor of biology at Boston University, conduct research in the Sanctuary, and have worked closely with a wide range of people in the region since moving to the Boston area 28 years ago. Today, SBNMS is one of the Commonwealth's most remarkable assets. It is a wildlife wonder and economic cornucopia, where on a clear day great whales, fishing boats, and skyscrapers are visible in a single view. The only place in the world that strikes me as even vaguely similar is Nairobi National Park in Kenya. Think about it. SBNMS is America's urban national marine sanctuary, and its most distinctive inhabitant is us.

The SBNMS Draft Management Plan is in many ways a plan to be proud of. It is well written, clear, highly informative, attractive, and comprehensive. Its one major weakness- and a lethal one- is the paucity of clear action items. This is a huge disappointment. During the process of stakeholder involvement that accompanied the drafting of the plan, and in the various working groups, action was the order of the day. The Sanctuary is currently a sanctuary in name only, and this Plan was intended to change that. It was to do so in a way that ensured the safety and sustainability of both wildlife populations and human ways of life. Everybody understood that this great goal would require give-and-take, that was not the issue. Everybody wanted the outcome to be a healthy and sustainable Sanctuary. Late drafts of documents out of the working groups in which I was personally involved aimed high and embraced this objective with a host of specific recommendations and action items. I was so proud of my fellow participants, most especially those with whom I may have disagreed. Somewhere between public participation and the printer, the greater weight of good intention slipped over the stern. The result is that this attractive document is sorely lacking in Woody Allen's two favorite organs, and most especially, his very favorite.

One issue that is cardinal to all aspects of the Sanctuary's future health lies deeply hidden in the Action Plan for "Ecosystem-Based Sanctuary Management." All the stuff in the action plan is good, but what is missing is catastrophic. What is missing is a direct acknowledgement that there are use conflicts that must be resolved, and actions that will be taken to resolve them. The Sanctuary is a fishing zone. It is also a wildlife protection zone. And on top of this, human use within the Sanctuary is supposed to be managed with the entire ecosystem in mind. That means that the fish you are about to remove to pay the mortgage or feed a family gathering must be debited from the ecosystem's ability to maintain self-sustaining populations and healthy habitats. This isn't just about counting the fish and then catching fewer than that number. It's about keeping valuable commercial product swimming around in the sea, because it is sometimes *more* valuable as wildlife, or as a recreational catch, or, heaven forbid, merely because it matters to us that out there someplace there are still a few cod and lobster and bluefin so huge and old as to be the stuff of awe. It is about making sure that the full and amazing panoply of species that swim, crawl, fly or flutter out there, are there, in good numbers and forever. And what about the ways of life we vowed to preserve? What about watermen? Wasn't this our chance to show that within limits, we can have our fish and eat them too? Where is the bold action that will demonstrate that this is so, or else discover that it just isn't? What about the connections between the Sanctuary and the watershed of Massachusetts, or indeed, New England? Where is the action to restore anadromous fish runs that contribute to the Sanctuary's food base, or to help ensure the survival of our most endangered great whale?

We know where the plans for these actual actions vanished off to: the land of jurisdictional conflict and political cowardice. I tell you, somebody has been at this document with an axe. We talked about these things, we argued and fought and debated and got all heated up and then we made very substantive progress toward solutions. How dare this government make so little of its citizens' well-intentioned expenditure of vast sums of human energy and emotion? Causing us to repeat this entire process from the very beginning- which is what, in essence, the Draft Management Plan requires us to do- is a huge disservice to the Sanctuary's constituents- all of them- human and otherwise.

This is not to say that the work carried out in preparation of this document actually resulted, then and there, in solutions. No, but we did frame the key problems front and center for all to see. Then they were put away, like the curious belongings of some eccentric and embarrassing relative who just recently passed away. All that work.

So if this document is indeed a draft, then what the final version must show is a lucid recognition of the user conflicts and trade-offs that must be resolved if the Sanctuary is to emerge from its cynical chrysalis and spread and dry its wings for real.

In closing, I have only praise for the Sanctuary staff and the difficult position they are in. They have succeeded in preserving within this document, the spirit, principles, and ideals that grew out of the participatory process. So the brains of the operation are still partly there. However, I need not spell out those organs most conspicuously missing. The current action plans in the SBNMS Draft Management Plan bear just a bit of that signature of a Washington DC government hostile to reason and friendly to denial, too cowardly, or too self-interested to deal up front with uncomfortable truths. But we are citizens of a Commonwealth that prides itself on thinking and acting in accordance with more noble aspirations. Shame on us for forgetting this in our mission to heal and nurture our Sanctuary. Let's put the mojo back in this manuscript, state outright that we recognize the challenge of conflicting uses in this Sanctuary, and dedicate ourselves to bold action that resolves these conflicts and does best by our grandchildren and our mother planet...who by the way are in the same boat right there along with us.

Sincerely,

Les Kaufman
Citizen of Brookline, Massachusetts
Professor of Biology, Boston University
Associate Director, Boston University Marine Program
Principal Investigator, Marine Management Area Science, Conservation International

From: Erin Hobbs <ehobbs@stonehamschools.net>
To: sbplan@noaa.gov
Subject: Sanctuary Needs Education
Date: 09/16/2008 8:14:43 PM

To whom it may concern,

I first picked up the Stellwagen Bank National Marine Sanctuary's management plan this past summer while working part-time at the Gulf of Maine Research Institute. I immediately started thumbing through the research and projects looking for something I could use in my High School classroom. A Masters in Zoology provided me with research training, which I now use translate difficult science into material I can use in my classroom. Unfortunately, many elementary, middle and high school teachers do not get that opportunity and training. Therefore, I feel the management plan is missing a vital component, EDUCATION. In order to preserve and protect the Sanctuary, it is necessary to educate those who will be utilizing the sanctuary in the future. More often than not, the general public is unaware of the research taking place, reasons for the research and the importance of preserving a place like the sanctuary. Overcoming this challenge requires education in both the classroom and a general public setting. The effectiveness of this plan will only extend to those who are aware of the Sanctuary's concerns. Increase awareness of the sanctuaries efforts and one will increase the number of stewards willing to protect it.

Thank you,
Erin Hobbs

Erin Hobbs
Science Teacher
Stoneham High School
149 Franklin St
Stoneham, MA

From: Carolyn Bishop <cbishopma@verizon.net>
To: sbplan@noaa.gov
Subject: Stellwagen Bank Draft Management Plan comments
Date: 09/10/2008 11:08:17 AM

From: Carolyn and Walter Bishop
7 Orchard Street, Belmont MA 02478
September 10, 2008
Re: Stellwagen Draft Management Plan and Environmental Assessment:

I understand that the comment period on Stellwagen Draft Management Plan and Environmental Assessment has been extended into October. I hope this is true so our comments may be considered part of the record.

Stellwagen Bank is a vital resource for the health of the ocean in the New England area. Our oceans worldwide have been abused, depleted, polluted and degraded in every possible way and yet provide vital links to the health of the planet. We celebrated when it was named as a Marine Sanctuary, however Stellwagen is still being exploited and abused, denying its role as a sanctuary; which is interpreted as a place of safety for many species. Instead it is trawled, dragged, overfished, polluted from dumped ballast waters, oil spills and dumped bycatch.

The health of many species depends on the management of Stellwagen. This management plan is a first stage in recognizing the vital role this area plays. The magnificent whales and graceful terns are dependent on the seemingly insignificant sand lance for survival. Studies have shown this fish has an important role in the food chain and their habitat, sandy shoals, need protection. Studies of malnourished terns feeding on substitute food sources indicate the population of sand lance is severely impacted.

Trawling and dragging should be prohibited from the sanctuary. The destruction of the sea bed impacts the health and productivity of the whole area. Having personally dragged ashore many abandoned fishing nets, weights and floats that have floated near shore, we know that many many more are out there indiscriminately killing species. Requiring identification on fishing gear is an important step toward responsible fishing.

Bycatch of fish is wasteful and polluting. Even more appalling is the bycatch of seabirds, turtles and mammals trapped in unmonitored nets or by trawlers. More enforcement is vital and more trained observers on NOAA boats must be funded as soon as possible.

The stress on this area by commercial fishing is incalculable. Isn't there some way to protect the sanctuary this pressure? Every square inch of the area is physically disturbed by fishing, the mature individuals of the population have been removed, the millions of tons

of fish and crustaceans annually taken are depleting the ability of the area to recover. The food source for creatures higher on the food chain has been decimated. The linked impacts are serious and must be addressed.

Commercial shipping is another concern. This is a regular Times Square of shipping activity and records many vessel/whale collisions that naturally cause more damage to whales than to ships! Noncompliance with regional whale watch guidelines is higher than is acceptable. Dumping of bilge water makes the area susceptible to invasive non native species as well as pollution.

We are strongly in support of implementing the Management Plan and funding enforcement as soon as possible in the hope that it isn't too late to rescue this vitally important resource.

Thank you for your consideration of our comments
Carolyn and Walter Bishop

From: nproctor@fundstaff.org
To: sbplan@noaa.gov
Subject: Make Stellwagen Bank a true marine sanctuary
Date: 09/10/2008 11:00:42 AM

Dear Marine Sanctuary Superintendent for Stellwagen Bank, I urge you to protect the Right and Humpback whales of Stellwagen Bank. Stellwagen Bank is supposed to be a marine sanctuary, but harmful practices threaten the whales there and the entire ocean ecosystem upon which they depend.

To make Stellwagen Bank a true marine sanctuary, I urge you to:

- Keep industrial shipping out of the Bank in order to prevent huge ships from striking the whales;
- End bottom trawling wherever it threatens to destroy the Bank's fragile floor;
- Ensure that factory fishing vessels leave enough plankton, herring and other food for the Bank's whales; and
- Enforce the rules designed to prevent whales from being tangled in discarded fishing nets.

Nathan Proctor
44 Winter St.
Boston , MA 02108

From: CharterWhiteCap@aol.com
To: sbplan@noaa.gov
Subject: Stellwagen Bank Plan
Date: 09/04/2008 7:35:28 AM

9/4/08

Management Plan Review Coordinator, Stellwagen Bank National Marine Sanctuary, 175 Edward Foster Rd., Scituate, MA 02066.

Please do not close, alter or modify the banks current operation. To do so will be against the original mission statement of Gerry Studds SANctuary--if the Sanctuary is closed or modified, over 200 captains and charter boat operators will petition congress to remove the name "Sanctuary" from the designation, allowing full use of the area.

Instead, I suggest a \$1 tarriff on each and every of the 1.1 million whale watchers annualy to the area to continue the great enforcement of the ruiles and regulations of the area.

Hope that helps

Captain Brad White

White Cap Charters LLC

149 Old Main St, PO box 489, Marshfield Hills, MA 02051

Toll free tel: (877) 897.7700, boat: (617) 966.1986

email: CharterWhiteCap@aol.com

website: <http://www.charterwhitecap.com/>

Over 37 Years Experience Navigating Massachusetts Bay

Ships Master - USCG Licensed 50 Gross Tons - #1122098

Memberships: North East Charter Boat Captains Association, Stellwagen Charterboat Captains Association,

New Inlet Boating Association,

Newport Drug Free Alliance, Ducks Unlimited & Scituate Rod and Gun Club

It's only a deal if it's where *you* want to go. Find your travel deal [here](#).

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: 'Aircraft observe the FAA minimum altitude of 1,000 feet overwater.'][1]
Date: 08/27/2008 2:16:49 PM

----- Original Message -----

Subject: 'Aircraft observe the FAA minimum altitude of 1,000 feet over water.'
Date: Wed, 07 May 2008 13:11:19 -0400
From: w.kossowan <wkossowan@comcast.net>
To: Stellwagen@noaa.gov

RE: Whale Watching from aircraft: 'Aircraft observe the FAA minimum altitude of 1,000 feet over water.'

According to the Federal Aviation Regulations - there is no such regulation.

The only thing the FARs state is that aircraft shall not be operated closer than 500', (be that vertically; diagonally or horizontally), from any person or man-made object.

I insist that you provide the specific FAR Part that states the operating rules pertaining to watching whales from aircraft or get your facts straight - and stop trying to play 'say so authority" (that's the way it is because I say so.)

W. Kossowan

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: Urgent letter for Superintendent MacDonald]
Date: 08/25/2008 3:40:15 PM

----- Original Message -----

Subject: Urgent letter for Superintendent MacDonald
Date: Thu, 05 Jun 2008 08:44:52 -0400 (EDT)
From: Medtec0207@aol.com
To: Stellwagen@noaa.gov

Dear Superintendent MacDonald,
I am writing in regard to the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. I, and my friends, also committed wildlife supporters here in Massachusetts, am very concerned that New England's only National Marine Sanctuary provides very little protection for the habitat and animals within its borders, and that your proposed plan simply does not increase protection.

Your plan does detail 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. Yet the proposed action plans and future

potential regulatory packages extending out five years into the future do not contain sufficient detail, commitment, or timeliness to truly demonstrate your goal of protecting sanctuary resources.

I URGE you to revise the Draft Plan to contain the following:

- Develop regulations immediately to reduce whale disturbance by all commercial and recreational vessels;
- Develop a zoning plan immediately with accompanying regulations that designates no-take 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;
- Adopt the proposed draft 'vision' as the Sanctuary's guiding vision.

Thank you from all wildlife supporters at Plum Island, Mass and National Refuge Area

Sincerely, Carol Turnquist, 5 I Street, Newburyport, MA & Parker River Refuge Volunteer (_medtec0207@aol.com (mailto:mailto:_medtec0207@aol.com))

*****Get trade secrets for amazing burgers. Watch "Cooking with Tyler Florence" on AOL Food.

(<http://food.aol.com/tyler-florence?video=4?&NCID=aolfod00030000000002>)

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: Response to Draft Management Plan]]
Date: 08/25/2008 3:39:20 PM

----- Original Message -----

Subject: [Fwd: Response to Draft Management Plan]
Date: Thu, 10 Jul 2008 09:53:49 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>,
Ben Haskell <Ben.Haskell@noaa.gov>

file for the record

----- Original Message -----
Subject: Response to Draft Management Plan
Date: Thu, 10 Jul 2008 09:18:54 -0400
From: Skip DeBrusk <sdebrusk@comcast.net>
To: Craig MacDonald, Ph.D. <Craig.MacDonald@noaa.gov>
CC: Rick Murray <rickm@bu.edu>

Response to Stellwagen Bank Draft Management Plan

7-10-08

To: Craig MacDonald, Ph.D.
From: Skip DeBrusk

Superintendent
18
Michael Ave.

Stellwagen Bank National Marine
Sanctuary Scituate, MA 02066

175 Edward Foster
Road
781-545-1353

Scituate, MA
02066
sdebrusk@comcast.net

Dear Dr. MacDonald,

Thank you for this opportunity to comment on the Stellwagen Bank National Marine Sanctuary Draft Management Plan and Environmental Assessment.

I have enjoyed the privilege of visiting Stellwagen Bank for over 60 years.

As I have stated, publicly and privately, the Sanctuary is a very special and unique place worthy of our most careful and earnest protection.

Were Gerry Studds alive today, I believe he would urge us to find simple, elegant solutions resulting in win / win actions. As a friend and supporter of commercial fishing he would ask that we avoid inflammatory, antagonistic language and the use or placement of selective data.

There are numerous areas where positive actions would benefit everyone involved - commercial fishermen, recreational fishermen, environmentalists, and residents of the bank including the fish, mollusks, etc. Examples include:

- * The permanent protection of sand lance.

Nearly everyone would agree this is a benefit to all. I suggest the proposal go further, to take pro-active steps to protect more of the lower food chain - the copepods, krill and zooplankton before someone starts to commercially fish these species. Certainly there are people thinking of a way to provide food for farmed fish.

- * Reduce the number of discards.

The endorsement of sector formation by commercial fishermen holds the potential to dramatically reduce the number of discarded fish. If Sanctuary Management took a leadership position in sector formation it would result in a reduction of one of the most egregious aspects of commercial fishing.

- * Act on the Ecosystem Based Sanctuary Management Plan.

Moving from the stock-specific to the more effective ecosystem also provides for fewer discards and a healthy regeneration of bio-mass.

- * Expand working relations with the Mass Fishermen's Partnership (MFP).

Escalating the common interests between fishing and management of the Sanctuary via recent scientific input is a positive step for all.

Surely there are many other areas in this worthy of consideration and discussion, however, I believe a simple plan, acted on in a timely manner is far more effective than a complex, multi-layered 5 (or 10) year plan.

Sincerely,

Skip DeBrusk

/"Codfish, Dogfish, Mermaids, and Frank"/
By Skip DeBrusk
18 Michael Ave., Scituate, MA 02066
<http://skipdebrusk.com/>

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: Request for management plan comment period extension]]
Date: 08/25/2008 3:37:25 PM

----- Original Message -----

Subject: [Fwd: Request for management plan comment period extension]
Date: Mon, 21 Jul 2008 15:51:25 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>

please file with draft management plan comments.

----- Original Message -----

Subject: Request for management plan comment period extension
Date: Fri, 18 Jul 2008 15:35:47 -0400
From: Sean Cosgrove <SCosgrove@clf.org>
To: Craig.MacDonald@noaa.gov

Superintendent Craig MacDonald
Stellwagen Bank National Marine Sanctuary
Scituate, Mass.

July 18, 2008

Dear Mr. MacDonald:

I am writing to request an extension of the comment period of the Draft Management Plan and Environmental Assessment to extend an added 60 days past the August 4, 2008 deadline. I'd appreciate any information regarding this request.

Sincerely,

Sean Cosgrove
Campaign Manager
Conservation Law Foundation

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: RE: FW: Stellwagen Bank Sanctuary Draft Plan Released]]
Date: 08/25/2008 3:37:09 PM

----- Original Message -----

Subject: [Fwd: RE: FW: Stellwagen Bank Sanctuary Draft Plan Released]
Date: Mon, 21 Jul 2008 17:43:01 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
CC: Ben Haskell <Ben.Haskell@noaa.gov>

BiBi - Formal comment on DMP. Please file. Craig

----- Original Message -----

Subject: RE: FW: Stellwagen Bank Sanctuary Draft Plan Released
Date: Fri, 18 Jul 2008 10:56:44 -0400
From: Mickelson, Mike <Mike.Mickelson@mwra.state.ma.us>
To: Craig MacDonald <Craig.MacDonald@noaa.gov>
CC: Ben Haskell <Ben.Haskell@noaa.gov>
References:
<C0CF5802DA312049982061E94F592D3908A093E9@MWRAMAIL.mwra.net>
<4835A187.6030906@noaa.gov>

Craig

May I make a late suggestion:
Fig 110 shows the LNG ports. Consider adding the GOMOOS A buoy and the NOAA 44013 buoy.

Thanks
Mike Mickelson
617 788-4951 desk
617 549-8336 cell

-----Original Message-----

From: Craig MacDonald [<mailto:Craig.MacDonald@noaa.gov>]
Sent: Thursday, May 22, 2008 12:39 PM
To: Mickelson, Mike
Cc: Ben Haskell
Subject: Re: FW: Stellwagen Bank Sanctuary Draft Plan Released

Mike - Didn't get the earlier email with your comments, so thanks for resending. They are very substantive and we will address them in the final plan.

Thanks, Craig

-----Original Message-----

From: Mickelson, Mike

Sent: Wednesday, May 07, 2008 5:56 PM
To: 'sbplan@noaa.gov'
Cc: Ben Haskell (Ben.Haskell@noaa.gov); Rex, Andrea
Subject: FW: Stellwagen Bank Sanctuary Draft Plan Released

Dear Craig,

I have 4 specific comments on the draft management plan, in addition to congratulating you for a job well done.

1) p58. "... the highest concentration of Alexandrium cysts was recorded in the sediment of the sanctuary." Is this true? Even if it is, it lacks the proper context. You should check it with Don Anderson.

2) p162. "Figure 110. Location of two separate Liquefied Natural Gas (LNG) deepwater ports..."

I believe that your coordinates for the Neptune LNG buoys are wrong.
Northeast gateway is OK

Neptune (proposed):

North Buoy: Lat N 42 deg 29' 13", Long W 70 deg 36' 30"

South Buoy: Lat N 42 deg 27' 21", Long W 70 deg 36' 07"

Northeast Gateway (as-built):

Buoy A: 42° 23' 38.46" N/ 70° 35' 31.02" W

Buoy B: 42° 23' 56.40" N/ 70° 37' 0.36" W

So please correct your figure and avoid propagation of the remarkably widespread confusion about those coordinates.

3) You could have mentioned your collaboration with Seakeepers to outfit the RV Auk with underway-sampling sensors.

4) One of the most important sources of data we have is NOAA Buoy 44013, operated by NDBC. You forgot to mention it! A nod to NDBC might help continue funding of that buoy.

Thanks
Mike

~~~~~

Dr Michael J Mickelson  
MWRA Building 39; 100 1ST AVE  
Boston MA 02129  
[mike.mickelson@mwra.state.ma.us](mailto:mike.mickelson@mwra.state.ma.us)  
(617) 788-4951 desk; -4888 FAX  
(617) 549-8336 cell  
<http://www.mwra.state.ma.us/harbor/html/bhrecov.htm>

~~~~~

...

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: comments on Stellwagon Plan]]
Date: 08/25/2008 3:36:51 PM

----- Original Message -----

Subject: [Fwd: comments on Stellwagon Plan]
Date: Mon, 28 Jul 2008 12:12:02 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
CC: Ben Haskell <Ben.Haskell@noaa.gov>

Please include in DMP public comment file. Craig

----- Original Message -----

Subject: comments on Stellwagon Plan
Date: Mon, 28 Jul 2008 12:01:02 -0400
From: John Bullard <jbullard@sea.edu>
To: Craig MacDonald <Craig.MacDonald@noaa.gov>
CC: Priscilla Brooks <PBrooks@clf.org>, John Jensen <jjensen@sea.edu>, Mary Malloy <mmalloy@sea.edu>, Erik Zettler <ezettler@sea.edu>, Paul Joyce <pjoyce@sea.edu>, Noah Chesnin <Nchesnin@clf.org>

Hi Craig,

My comments are offered as an individual, not of behalf of Sea Education Association.

The management plan's findings have credibility because of the very thorough process that was undertaken to produce it. Congratulations. The management plan calls for further study and policy development. This is understandable.

The management plan identifies various threats to Stellwagon Bank - destruction of habitat and historical resources from mobile gear, marine mammal entanglements from fixed gear, high discards, total removals that alter biodiversity and threaten food supplies, ship strikes of marine mammals - and others. The plan does a good job of describing the value and services of the Bank, defining a vision for what the Bank could be and pinpointing the major threats to achieving this vision.

Having identified the threats, the plan does nothing directly to reduce or eliminate those threats. It calls for study and conversation with NEFMC, NOAA and other parties.

Sooner or later, to achieve the goals of the Stellwagon Bank Sanctuary, fishing practices are going to need to be significantly altered and in some places eliminated. This will be very controversial. Besides calling for study and conversation to tiptoe up to this hard reality, the Management Plan should be clearer and more forceful about the need for these measures. Join the battle. Advocate restrictions. Suggest alternatives such as the opening of some currently closed areas (designed before Stellwagon and modern location enforcement measures) that might provide the equivalent harvest that would be given up if Stellwagon is closed. Or a modification to allocated days at sea, to

make the closure neutral to harvest.

There is one comment I would like to make on behalf of SEA. We operate two sailing research vessels. One of them, the /Corwith Cramer/, transits Stellwagon Bank several times each year with our students and our modern research equipment. We have enjoyed a mutually beneficial relationship with several sanctuaries and would welcome the opportunity to explore whether there is more we could do for Stellwagon. Please let me know if you are interested in exploring this offer.

All the best,
John

John K. Bullard
President
Sea Education Association
P.O. Box 6
Woods Hole, MA 02543
508.548.8404 direct
<http://www.sea.edu>

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: Protect Stellwagen Sanctuary, Improve the Draft Management Plan]]
Date: 08/25/2008 3:36:25 PM

----- Original Message -----

Subject: [Fwd: Protect Stellwagen Sanctuary, Improve the Draft Management Plan]
Date: Tue, 12 Aug 2008 10:08:08 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>

please file under DMP comments, Craig

----- Original Message -----
Subject: Protect Stellwagen Sanctuary, Improve the Draft Management Plan
Date: Mon, 11 Aug 2008 18:12:51 -0400
From: Fran Hensler <fjh@zvm.sru.edu>
Reply-To: fjh@zvm.sru.edu
Organization: Slippery Rock University
To: Craig.MacDonald@noaa.gov

Dear Mr. 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.

Thank you.

Francis J Hensler Home: 724-794-6172

165 W Liberty St Work: 724-738-2153

PO Box 85 FAX: 503-212-6563

Slippery Rock, PA 16057-0085 RockFox@zoominternet.net
[<mailto:RockFox@zoominternet.net>](mailto:RockFox@zoominternet.net)

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: Protect Stellwagen Sanctuary, Improve the Draft Management Plan]]
Date: 08/25/2008 3:36:25 PM

----- Original Message -----

Subject: [Fwd: Protect Stellwagen Sanctuary, Improve the Draft Management Plan]
Date: Tue, 12 Aug 2008 10:08:08 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>

please file under DMP comments, Craig

----- Original Message -----
Subject: Protect Stellwagen Sanctuary, Improve the Draft Management Plan
Date: Mon, 11 Aug 2008 18:12:51 -0400
From: Fran Hensler <fjh@zvm.sru.edu>
Reply-To: fjh@zvm.sru.edu
Organization: Slippery Rock University
To: Craig.MacDonald@noaa.gov

Dear Mr. 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.

Thank you.

Francis J Hensler Home: 724-794-6172
165 W Liberty St Work: 724-738-2153
PO Box 85 FAX: 503-212-6563
Slippery Rock, PA 16057-0085 RockFox@zoominternet.net
[<mailto:RockFox@zoominternet.net>](mailto:RockFox@zoominternet.net)

From: William Cromwick <billcromwick@yahoo.com>
To: Craig.MacDonald@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary
Date: 08/20/2008 10:15:10 PM

Dear Mr. MacDonald and the Staff of Stellwagen Bank National Marine Sanctuary,

This email is to share my profound concern over the welfare of the Stellwagen Bank National Marine Sanctuary and to provide my comments for consideration.

I strongly propose that the following items be part of a new management plan:

- Establishment of no-take zones, in order to provide the opportunity for sea mammals, aquatic sea-life, and other species to recover; from the ocean floor to the ocean surface.
- Regulations to enforce the use of environmentally-friendly fishing gear & nets; along with financial assistance to fisherman in securing such equipment.
- Establishment of a well-defined zone in which large commercial vessels would not be permitted entry into the most sensitive areas of the sanctuary.
- Regulation and strict enforcement of adequate speed limits of large commercial vessels, to minimize whale collisions.
- String regulation to prohibit and/or severely limit trawling of the sea floor in order to prevent further damage to the ecology of the sanctuary.
- Monitoring of water quality to confirm current and new sources of pollution, as well as initiating scientifically sound steps to mitigate the impact of waste-water treatment discharge from Deer Island, and waste disposal from commercial and pleasure craft, within or in close proximity of the sanctuary.
- Making a concerted determined effort to save the North Atlantic Right Whale from extinction, by combining the talents and resources of all relevant parties; including marine biologists, environmentalists, fisherman, commercial fleets, and all concerned citizens.
- Disseminating educational material through all media outlets, in order to educate Massachusetts citizens of what remains a tremendous resource only a few short miles off our shores, and the necessity of protecting it for future generations.

Thank you for the opportunity to share my views!

In addition, please let me know how I may be of service, in any capacity, to assist in these efforts, and for the general preservation of our natural resources.

Yours Truly,

William Cromwick
116 Pearson Rd
Somerville, MA 02144
Tel 617-646-9657
billcromwick@yahoo.com

From: Michael Ferro <harborbar@yahoo.com>
To: sbplan@noaa.gov
Subject: FISHING CLOSURE IN STELLWAGEN BANK MARINE SANCTUARY (SBNMS)
Date: 08/20/2008 5:39:02 PM

T.W.I.M.C.,

THE FOLLOWING ARE STATEMENTS FROM 2004 REGARDING SBNMS. "Commercial and Recreational Fishermen Unite on the Future Management of Stellwagen Bank"

These commercial and recreational fishermen agree that (2004):

- The current designation charge that allows fishing in the SBNMS should be retained without amendment;

This is due to the fact the commercial and recreational fishermen CAN NOT AGREE on how the manage themselves and use a fishing stock rebuilding style of fishing practices.

- The National Marine Fisheries Service and the New England Fishery Management Council should retain exclusive authority to manage fisheries regulation within Sanctuary boundaries;

Though these organization have tried to curtail fishing to help stock rebounds, their efforts have come with still higher quotas and knowingly allow unscientific information from politicians to set fishing quota guidelines. Talk about the "*fox guarding the henhouse*"

- The current boundaries of the SBNMS should be maintained without modification;

Commercial and recreational fishermen do not want expansion of the boundaries because the fish landing and the general science at large know without drastic measures the fish will be gone with a chance to rebound. Drastic measures being full closure of SBNMS, zero fish forever.

- The 400 year history of fishing on Stellwagen Bank should be prominently included as part of SBNMS's public outreach message;

This statement goes to show where commercial and recreational fishermen are completely crazy. 400 hundred years for fishing without a rest, that should be reason enough the close SBNMS to all fishing,

- The Ecosystem Based Management Work Group's Action Plan should serve as the basis for the development of the SBNMS five-year management plan. This plan strives to create a foundation upon which ecosystem-based management can be developed and implemented in the future. Fishing industry members and organizations desire to be and should be active participants in all stages of recommended research projects and initiatives;

Like I said before "*fox guarding the henhouse*". *In all the years that SBNMS has existed have commercial and recreational fishermen agreed with a plan for increasing fish stock with the Gulf of Maine or SBNMS*

- The SBNMS should be considered as a subset of the larger Gulf of Maine ecosystem when being assessed from scientific and regulatory perspectives;

SBNMS should be considered that last hope in the full fish stock recovery of the larger Gulf of Maine ecosystem. 400 years of fishing is a testament to the fact that this area will like reap the best benefits for zero fishing zone.

- Research should necessarily precede policy-making and scientifically defensible findings should be the foundation upon which these decisions are made;

DUH!!!!!! So why has it not happened?

- Research and use data should be maintained centrally and should be easily accessible and comprehensible by the public;

Commercial and recreational fishermen as well as SBNMS should develop their own outreach plans. People around the state have no idea the SBNMS exist and less of an idea to the real health of our coastal waters. Research data and use of it is a secret to the common citizen, and that is a shame.

- and Quality partnerships and stewardship are essential to maintain the ecological health of SBNMS.

No mount of harmony land based organization will help the *ecological health* of SBNMS.
THE ONLY WAY TO HELP *ecological health* of SBNMS IS TO STOP FISHING IN 1% OF THE GULF OF MAINE. THAT 1% IF THE AREA OF SBNMS.

Please help NOAA close SBNMS to fishing.

Sincerely,

Mike Ferro

From: Leo, Wendy <Wendy.Leo@mwra.state.ma.us>
To: sbplan@noaa.gov
Subject: SBNMS management plan comments
Date: 08/19/2008 3:48:11 PM

Dear SBNMS staff:

Congratulations on the Stellwagen Bank NMS draft management plan. It is quite comprehensive and the final plan is sure to be a valuable resource. I just have a few comments.

page 64

While it appears that inputs from point source discharges have been decreasing over the past decade, it has been difficult to adequately estimate the magnitude of the non-point source inputs. A major component missing in the present MWRA and the Stellwagen Bank sanctuary water monitoring projects is "event-driven" sampling geared to wastewater system failures and storm-water overflows. While 98% of the effluent in 2002 underwent secondary treatment, for example, there was still part of the waste-stream that was released untreated or only partially treated due to storm events and temporary inability of the facility to handle the overflow.

Comment: Since it is not actually possible to release untreated wastewater from the Massachusetts Bay outfall, I suggest "untreated or only partially treated" should be changed to "only partially treated". Even during large storms the vast majority of the flow through the outfall receives secondary treatment, and 100% receives primary treatment and disinfection.

There are some discharges of untreated combined sewage-stormwater up in Boston Inner Harbor and its tributary rivers -- for which MWRA does indeed have a monitoring program at appropriate time and space scales – but effects of these discharges are local and not relevant to the offshore sanctuary.

page 225

While scientific studies indicate that effluent discharges from the MWRA outfall are not a nutrient concern to Massachusetts Bay and SBNMS, there is discussion and concern over levels of chlorine discharge in the immediate area of the outfall diffusers. Added demands on this system, and/or the addition of new sewage outfalls into Massachusetts Bay; however, may introduce additional nutrients and pollutants that could affect the sanctuary. Cumulative impacts of all waste streams are also unknown at this time and should be monitored.

Comment: It is not clear who is discussing levels of chlorine and what the concern is. MWRA's NPDES discharge permit has a very strict limit for chlorine residual, and the effluent is dechlorinated before

discharge.

Comments on citations of MWRA documents:

All references to "MWRA, 2006" on pages 59-61 should actually be to "Werme and Hunt, 2006." In the reference list:

Massachusetts Water Resources Authority, 2006. 2005 outfall monitoring overview. Environmental Quality Department report ENQUAD 2006-18. 105 pp.

should be replaced with the following:

Werme C, Hunt CD. 2006. 2005 outfall monitoring overview. Boston: Massachusetts Water Resources Authority. Report 2006-18. 105p.

p. 64 - "However, over the years improved treatment and pre-treatment methods and technologies have helped to dramatically lessen the quantity of pollutants discharged into the Massachusetts Bay/Cape Cod Bay system (MWRA, 2002)"

Correct citation is Rex et al., 2002. This should be listed in the "Sources Cited" as follows:

Rex AC, Wu D, Coughlin K, Hall MP, Keay KE, Taylor DI. 2002. The state of Boston Harbor: mapping the Harbor's recovery. Boston: Massachusetts Water Resources Authority. Report 2002-09. 42 p.

page 65, "MWRA, 2004" (caption of figure 28) – correct citation is "Werme and Hunt, 2004." In the reference list this should appear as

Werme C, Hunt CD. 2004. 2003 outfall monitoring overview. Boston: Massachusetts Water Resources Authority. Report 2004-13. 97 p.

In the "Sources Cited" section, the following reference seems to be a bunch of reports mashed together. I don't think any of them are actually referred to in the text except for the "State of Boston Harbor 2002", which is Rex et al. 2002 as noted above.

Massachusetts Water Resources Authority, 1991. The State of Boston Harbor 2002: Mapping the Harbor's Recovery.

December 20, 2004. Assessment in Boston Harbor

Massachusetts Water Resources Authority, 2002.

Massachusetts Bay Fact Sheet. Boston Harbor Outfall

Project. ENQUAD Technical Report 92-3.

Please email me if you need any clarification on my comments. I look forward to the final management plan.

Sincerely,

Wendy S. Leo

Program Manager, Marine Studies

MWRA Environmental Quality Department

From: Heather Knowles <hlk@northernatlanticdive.com>
To: sbplan@noaa.gov
Subject: Final comments on the DMP
Date: 08/15/2008 12:20:49 PM

Attachment N1: [dmp_mhr_ap-knowles-final_081508.pdf](#)

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
Web: <http://www.northernatlanticdive.com>

From: jjwest@hyperusa.com
To: sbplan@noaa.gov
Subject: No subject
Date: 08/11/2008 11:26:24 AM

Any plan for the creation of a marine sanctuary, considering the condition of our oceans today, should trump any economic considerations as they are only short term.

From: Michael P. Massagli <mikemassagli@comcast.net>
To: sbplan@noaa.gov
Subject: COMMENT ON DRAFT MANAGEMENT PLAN
Date: 08/10/2008 7:39:39 AM

If it's a sanctuary, treat it like one. Not having any restrictions on commercial fishing is ridiculous.

Michael Massagli
29 Mount Vernon Street
Cambridge, MA 02140

From: atmame77@aol.com
To: sbplan@noaa.gov
Subject: Draft Management Plan, Syellwagen Bank
Date: 08/07/2008 4:00:11 PM

I hav a few comments about Appendix J. Preliminary species list for the Stellwagen Bank National Marine Sancturay.

On page 329 under family "Calanidae" is used for "Cancer borealis". But this is a "near" duplicate as just below
the correct family is used "Cancridae" is used for "Cancer borealis".

On page 330 under family "Cancridae" is is used for "Centropages typicus". "Centropagidae" is the correct family.

Also the common name "Jonah Crab" is for "Cancer borealis". on page 329.

On page 330 under family "Chirocephalidae" is the correct family name for "Chiridotea caeca"

I won't go on, but the Families are incorrect in many places due to "typo glitches".

Thanks again for publishing this report.
I do find these kind of lists very useful.

Douglas N. Greene
31 Cape Cod Avenue
Reading, MA 01867

It's time to go back to school! Get the latest trends and gadgets that make the grade on [AOL Shopping](#).

From: PAT PRICE <pat321@sbcglobal.net>
To: sbplan@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary
Date: 08/07/2008 2:08:28 AM

I've been reading what I can find, and believe I can tell you how I feel and think about the Stellwagen Bank National Marine Sanctuary. I was born and raised in Nebraska and I would go down to the Platte River on my bike and I'd sit and watch. I got books from the library about sailing ships, and the first iron ships, and read all of them I could find. I even read Moby Dick and I loved that, too. But already I had decided that I was on the whale's side. As soon as I heard about California and the Gulf of Mexico, I left. I never regretted it. While living near League City, I bought a 30 foot Cal sail boat and sailed off to Corpus. I had many, many dolphins in Matagorda Bay that followed me for a long time. Since those days I have been to Cape Ann and am in love with New England as well.

A little long, but I love the sea and the animals and fish that live in it. We, as the people who make up the world, have not cared for the surface nor the sea of the globe and we are about to lose it all. I think about why someone would think that it is better to continue at a hurried pace or save some fuel to slow up and let the whale go swimming away. Fuel problems will probably be with us for a long time, but we are not sure of how long the right whale will have enough females to keep the animals continue to live. They only breed every six or seven years and there are only 50 of them left. My heart breaks to think I may never get to see one.

My son was an off-shore diver, and he would bring me shells and tell me about it. He died at 29, but he loved the sea as well as I do, and I like to think that he knows I'm still trying to keep the water clear, the whales safe, and the birds coming back in the spring. I have gone to Cape Ann for my vacation a couple of times and seen those huge "ships" that scrape the bottom of the sea there and it completely clears off all that was at the bottom. Do we have to do that? Isn't there a better way for all of us to work out a way that causes less damage? The water there is once again clear and people were fishing. Houston is far away from that, the nation's worst polluter.

I'm not sure I've written the kind of letter you wanted, but I only have the one story to tell you. I will help all that I can, but I pray that you will see how important it is to clean up our globe. We'll end up with a bare Earth. Right now I have read that there is only about 3.5% of the ocean that is still pure. The icebergs are breaking off much faster than expected. I've even heard that some tiny islands in the Pacific have already been washed away.

Anything that we can do or say to change what we are doing, should be done as soon as possible. Your plan is excellent, now put it into action.

I love the Whale Center of New England, so whatever they want, I want, too.

Sincerely,

Pat L. Price

From: Auster, Peter <peter.auster@uconn.edu>
To: sbplan@noaa.gov
Subject: comments on management plan
Date: 08/04/2008 7:41:50 PM

Attachment N1: SBNMS_Scientist_letter.pdf

Please see attached academic scientist letter in regards to the draft management plan. Thank you, in advance, for your consideration.

Sincerely,
Peter

Peter J. Auster, Ph.D.
Science Director, National Undersea Research Center
and
Research Associate Professor, Department of Marine Sciences
Univ. of Connecticut at Avery Point
1080 Shennecossett Rd.
Groton, CT 06340-6048 USA
Phone: 860-405-9121
Fax: 860-445-2969
e-mail: peter.auster@uconn.edu
Auster Lab Homepage: <http://www.nurc.uconn.edu/BigMouthFishes/homepage>
OceanAGE: <http://oceanexplorer.noaa.gov/edu/oceanage/05auster/welcome.html>
NURC Homepage: <http://www.nurc.uconn.edu>
Dept of Marine Sciences Homepage: <http://www.marinesciences.uconn.edu>

From: R. L. Garnett <aurelle@mchsi.com>
To: sbplan@noaa.gov
Subject: Comments on Draft Revised Management Plan for Stellwagen Bank
Date: 08/04/2008 4:27:50 PM

Dear Friends,

I am emailing to commend everyone who has been involved over the past several years in the preparation of the Draft Management Plan and Environmental Assessment for the Stellwagen Bank National Marine Sanctuary, and to express my appreciation for the opportunity to comment on the plan.

Although I no longer live in Massachusetts, I continue to have a personal interest in the protection of our coastal and marine environments, and of the animals that live and feed in the waters of the Sanctuary. I would like to offer these brief comments on areas of the Draft Plan that I find of particular importance.

1. Establishing a Program for Management of Whale Watching: I believe it would be important for the Sanctuary to look for ways to partner with the whale-watching industry and to encourage greater compliance on the part of the industry with speed guidelines. Disturbance of whales by vessels other than commercial whale-watch boats should also be studied, and addressed where the impact of such disturbance has a demonstrable negative effect on the whales.
2. Maritime Heritage Program: I think that, given limited funding resources, development in this area should not take priority over developing management actions that directly protect marine life and the marine ecosystem. Only after significant progress has been made in protecting the Sanctuary's biological treasures should any expansion of the marine heritage program be considered.
3. Forage Base Management: I am in support of the proposal to ban commercial sand lance fishing, and to monitor the level and impact of herring fishing. Without their natural food sources, whales and other marine predators will abandon the Sanctuary; insuring their forage base is an important step toward insuring the continued integrity of the marine ecosystem within the Sanctuary.
4. Habitat Zoning and Compatibility Analysis: While the activities proposed in this section are all positive, they may not go far enough. Within the next five years, I would hope to see a determination not just of the criteria for deciding which activities and uses are compatible with the goal of resource protection in the Sanctuary, but a comprehensive statement of what those activities and uses (both compatible and incompatible) are.

Other priorities:

1. I support the undertaking of a study to determine whether the full length of Jeffreys Ledge should be incorporated into the Sanctuary. As an important habitat for highly endangered North Atlantic right whales and one of the most important herring spawning habitats in the Gulf of Maine, I believe that Jeffreys Ledge in its entirety should be extended the status of marine sanctuary, to serve as a protected ecological buffer to the current Sanctuary area.

2. I would welcome the development of a plan to monitor water quality on Stellwagen Bank. With the many activities and uses taking place in or near Sanctuary waters, such a monitoring program would be vital for early warning signs of deterioration in ecosystem health.

3. I believe that the need to develop whale-safe fishing gear would warrant the granting of limited access to fishery resources in some part of the Sanctuary to fishermen who are willing to test innovative fishing methods, such as rope-less fishing, that would be safer for non-target species and lessen the risk of whale entanglements.

Thank you, again, for the opportunity to participate in this process. Stellwagen Bank is a vital marine resource with a long history as a rich and prolific center of biodiversity, and I appreciate very much the thought and care that has gone into producing a new, updated plan to guide all areas of its management, conservation, and resource protection.

Best wishes,
R. L. Garnett
3617 Evergreen Lane
Columbia MO 65201

From: steve@salevy.com
To: sbplan@noaa.gov
Subject: comment on draft
Date: 08/04/2008 3:13:00 PM

Volunteer coordination could be a top priority. "Volunteers" can multiply your efforts many times. They have technical, business and marketing skills that could be used. Volunteer management is not free and takes some special skills. Maybe you should start small and get a part time coordinator?

Steven Levy, BSME, MBA, MA DOE Lic. Physics & Math
steve@salevy.com, salevy.blogspot.com, 781-771-2779

From: ussdpv@juno.com <ussdpv@juno.com>
To: sbplan@noaa.gov, ussdpv@juno.com
Subject: DRAFT Plan on SBMS
Date: 08/04/2008 2:32:32 PM

I think today is the dead line and I spoke in Wenham, but I want to stress AGAIN NO DIVING Restrictions. Unless you define them and the PERMIT PROCESS 100 %..

Paul R Blanchette Jr

35 Intervale Ave

Dracut, Ma 01826

978 930 7397

From: Michael Ferro <harborbar@yahoo.com>
To: sbplan@noaa.gov
Subject: Comment for the SBNMS management plan
Date: 08/02/2008 7:02:19 PM

My past comments have been toward establishing SBNMS as a 'no-take marine zone', tempered with compromise division of the SBNMS limits.

WELL THAT IS NOT WHAT THIS COMMENT WILL BE!!!!

After read the history of fishing types and the limits of certain fishing gear it is time to limit all fishing within SBNMS limits.

It has taken me close to 4 months but I, a land surveyor with no marine back ground, have read;

The Unnatural History of the Sea-by Callum Roberts

Marine Protected Areas : Tools for Sustainin Ocean Ecosystem -by National Research Council, National Academy Press

Marine Reserves A Guide to Science, Design, and Use-Jack Sobel, Craig Dahlgren, Ocean Conservancy

Body of Evidence-The Fragile State of America's Oceans - A Review of Recent

Science and a Framework for Recovery-

BY

The Marine Fish Conservation Network

600 Pennsylvania Avenue, SE

Suite 210

Washington, DC 20003

www.conservefish.org

All three describe the state of the oceans created by fishing and how without complete stopping of fishing whole species will cease to exist from over fishing or starvation.

In the SBNMS management plan final draft please add the following phrase.

Instead of waiting for the fishing industries to provide ways to conserve Gulf of Maine fishing stocks. Starting in the year 2009, SBNMS limits will be a refuge for the preservation of marine life. In other words, NO MORE FISH WILL BE TAKEN with in the limits of Stellwagen Bank National Marine Sanctuary.

We will no longer cater to the few that use SBNMS currently. We have to manage the sanctuary for the good of everyone inlanders and fishers alike.

Thank you for your time,

Mike Ferro

87 searsville rd.

So. Dennis, MA

02660-3795

harborbar@yahoo.com

From: Tom Pierce <jtompierce@comcast.net>
To: sbplan@noaa.gov
Subject: comments on the draft management plan
Date: 07/31/2008 9:29:27 PM

Attachment N1: stellwagen letter.odt

From: Michael Prange <prange@alum.mit.edu>
To: sbplan@noaa.gov
Subject: Comments on Stellwagen DMP
Date: 07/31/2008 6:39:13 PM

My name is Michael Prange and I am a resident of Somerville, MA. These are my comments on the Stellwagen Bank National Marine Sanctuary Draft Management Plan. My primary concerns are to see the sanctuary managed to serve two purposes:

- 1) as a sanctuary for marine life, it should restrict fishing to allow it to recover and flourish; and
- 2) as a sanctuary for historical resources, it should protect our submerged maritime heritage so that, as in a national park, it can be experienced by current and future generations.

I have been scuba diving for more than 33 years, with 26 years of diving in the Boston area. This has made me aware and saddened by the degradation of our local marine environment. On my last scallop dive offshore of Manchester, MA, the sandy bottom was devoid of life, scoured clean by bottom trawlers whose telltale furrows were plainly visible in the sand -- this even though we were diving within three miles from shore. On another day we motored to a wreck site only to find a gill net moored to it. As we motored to another wreck, we passed several more gill nets. These are devastating because they indiscriminately kill turtles, seals and anything else that happens by. When they break lose, they are drifting killing machines for which no one takes responsibility. The Stellwagen Bank was once a thriving marine community, a habitat for sedentary bottom dwellers, migrating whales and everything in between. Given half a chance, it could recover to its former glory. I am strongly in favor of structuring the sanctuary management plan so that it provides marine protected areas within the sanctuary. This was done in the California Channel Islands NMS against the wishes of the local fishing industry, but it is already providing benefits for everyone by increasing marine life abundance and diversity both within and outside of the no-take zones. *Unfortunately, the draft management plan proposes few constraints on fishing within the sanctuary.* This must be rectified for the plan to be effective.

My second concern is that the draft management plan seems to view scuba divers as a threat to marine heritage sites. Instead of managing the Stellwagen wrecks as historical artifacts on public display, as has been successfully done with Lake Champlain, Lake George and St. Lawrence Seaway wrecks, where divers can only take photos and leave bubbles, the plan makes it easy for sanctuary managers to keep wrecks off limits to divers indefinitely until marine archeologists have fully analyzed them. The model seems to be that of the early days of the Monitor NMS, where only NOAA-sanctioned divers were allowed access to the site. According to Gary Gentile's 2008 book, *Shipwrecks of Massachusetts (North)* in the chapter entitled "The Stellwagen Bank Robbery", it took two law suits against NOAA before the Monitor was opened to diving by anyone. An alternative approach is to think of divers as joint custodians of these wrecks. NOAA does not have the resources to monitor these wrecks as they are gradually torn apart by storms and fishing activities, but could use local dive boat operators and volunteer divers to perform this role. To my knowledge divers are not only allowed, but are encouraged to dive the wrecks in other NMSs. This is a boon to local businesses, trains divers to think of wrecks as museum pieces and not salvage sites, and could be of use to NOAA in site monitoring. To assuage concerns about dive-related damage to the wrecks, I suggest that the plan writers query the managers of the successful dive sites mentioned above. The Thunder Bay NMS provides another model that may be useful.

Let's work together to make the Stellwagen Bank a role model for marine sanctuaries by creating a plan to increase its marine life abundance and diversity, and to open its historical resources to the public so that we may better appreciate the beauty and heritage of this bank.

Michael

From: steve@salevy.com
To: sbplan@noaa.gov
Subject: No subject
Date: 07/29/2008 3:26:10 PM

for: eA.2 objective—reDuce AlterAtion oF benthic habitat by mobile fishing

Minimizing the effect of fishing on the bottom and killing "junk" fish is the most important item.

Also, it would be nice to see more video media on your web site. Ask for donations?

Steven Levy, BSME, MBA, MA DOE Lic. Physics ?
steve@salevy.com, salevy.blogspot.com, 781-771-2779

From: Anamarija Frankic <Anamarija.Frankic@umb.edu>
To: sbplan@noaa.gov
Subject: students' comments and suggestions
Date: 07/28/2008 7:51:52 PM

Attachment N1: [Students' suggestions for Stellwagen.doc](#)

Please find attached comments and suggestions provided by the UMASS Boston Students of the class 226 Intro to Oceanography (55 students), Professor A. Frankic.
If you have any questions please contact me.

With best regards

Dr. Anamarija Frankic

Assistant Professor

UMASS - EEOS

100 Morrissey Boulevard

Boston, MA 02125

Tel: 617-287-4415

Fax: 617-287-7474

email: anamarija.frankic@umb.edu

<http://alpha.es.umb.edu/faculty/af/frankic.html>

[/email.umb.edu/exchweb/bin/redir.asp?URL=http://alpha.es.umb.edu/faculty/af/frankic.html](http://email.umb.edu/exchweb/bin/redir.asp?URL=http://alpha.es.umb.edu/faculty/af/frankic.html)

"We have a beautiful mother; her green lap immense; her brown embrace internal; her blue body - everything we know." (Alice Walker)

* Please consider the environment before printing this email

From: John Bullard <jbullard@sea.edu>
To: Craig MacDonald <Craig.MacDonald@noaa.gov>
Subject: comments on Stellwagon Plan
Date: 07/28/2008 12:01:02 PM

Hi Craig,

My comments are offered as an individual, not of behalf of Sea Education Association.

The management plan's findings have credibility because of the very thorough process that was undertaken to produce it. Congratulations.

The management plan calls for further study and policy development. This is understandable.

The management plan identifies various threats to Stellwagon Bank - destruction of habitat and historical resources from mobile gear, marine mammal entanglements from fixed gear, high discards, total removals that alter biodiversity and threaten food supplies, ship strikes of marine mammals - and others. The plan does a good job of describing the value and services of the Bank, defining a vision for what the Bank could be and pinpointing the major threats to achieving this vision.

Having identified the threats, the plan does nothing directly to reduce or eliminate those threats. It calls for study and conversation with NEFMC, NOAA and other parties.

Sooner or later, to achieve the goals of the Stellwagon Bank Sanctuary, fishing practices are going to need to be significantly altered and in some places eliminated. This will be very controversial. Besides calling for study and conversation to tiptoe up to this hard reality, the Management Plan should be clearer and more forceful about the need for these measures. Join the battle. Advocate restrictions. Suggest alternatives such as the opening of some currently closed areas (designed before Stellwagon and modern location enforcement measures) that might provide the equivalent harvest that would be given up if Stellwagon is closed. Or a modification to allocated days at sea, to make the closure neutral to harvest.

There is one comment I would like to make on behalf of SEA. We operate two sailing research vessels. One of them, the *Corwith Cramer*, transits Stellwagon Bank several times each year with our students and our modern research equipment. We have enjoyed a mutually beneficial relationship with several sanctuaries and would welcome the opportunity to explore whether there is more we could do for Stellwagon. Please let me know if you are interested in exploring this offer.

All the best,
John

John K. Bullard
President
Sea Education Association
P.O. Box 6
Woods Hole, MA 02543
508.548.8404 direct
<http://www.sea.edu>

From: Mike Hall <mikehall02@yahoo.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank National Marine Sanctuary public comment
Date: 07/28/2008 11:23:02 AM

To Whom It May Concern,

While it is encouraging that Stellwagen Bank is receiving attention for its unique biological and cultural resources, the draft management plan clearly does not go far enough.

It is imperative that Stellwagen is designated as a 'no take' zone, both for commercial and recreational fishing and that a speed limit no greater than 18.5 km per hour is mandated and enforced to reduce the potential hazards to marine mammals.

Research into the effects of human use may be necessary, but inaction comes at the cost of continued degradation of Sanctuary resources.

These actions would not be unprecedented. Our National Park system is charged with protecting natural, historical and cultural resources on land and prohibits any resource extraction whatsoever within park boundaries. Other countries, most notably Australia, have designated protected marine areas with proven economic benefit, while protecting natural resources.

Taken from the Australian Marine Sciences Association website :

.. "local studies have shown increased size and number of lobster in reserves in Tasmania and Western Australia (Edgar and Barrett 1999; Babcock et al. 2007) recolonisation of Sanctuary Zones by snapper in New Zealand (Denny et al. 2004) and spillover

of mudcrabs from no-take Sanctuary zones into fished areas in Moreton Bay (Pillans et al. 2005). Even though some MPAs may not be designed to directly increase fish numbers or growth within their boundaries, MPAs provide insurance for some fish species by acting as a refuge and protecting broodstock. Benefits to fish populations flow on to other species of marine life as the ecosystem is restored, to the extent that overall productivity of coastal

ecosystems can be increased (Babcock et al. 1999). MPAs act as critical 'baseline' areas to assess the impact of human activities and larger scale events such as global warming. The Australian Marine Sciences Association and the Australian Coral Reef Society together represent the majority of professional marine scientists in Australia. We support government initiatives to create representative MPAs on the basis of sound scientific evidence that MPAs (in particular sanctuary, conservation or no-take, zones) protect and enhance marine biodiversity and are a useful tool for the sustainable management of some fisheries."

It is clear that Stellwagen is in need of immediate protection and that change is necessary. Further study only delays appropriate action.

Regards,

Mike Hall

5 Leslie Rd.

Belmont, MA 02478

From: Alice Charkes <acharkes@verizon.net>
To: sbplan@noaa.gov
Subject: comments
Date: 07/26/2008 9:54:09 AM

These are comments for the Stellwagen Bank plan:

1. Too much commercial and private fishing is still allowed in Stellwagen Bank. These activities must be curtailed further to protect the Sanctuary.
2. Commercial fishing catches are still too large to support a healthy ocean population. The fishermen are depleting a natural resource in the short-term that has detrimental short-term and long-term effects. Too many herring are being caught, and the ocean bottom is being destroyed by commercial fishing techniques.
3. Commercial fishing traffic is too high in the Sanctuary area and it is adversely affecting the whale populations there. Restrict the number of commercial boats allowed through the Sanctuary.
4. Whale boats are adversely affecting the whale populations. Restrict their number severely.
5. Whale watch boats are not complying with regulations to protect the whale populations. Educate the population about what these restrictions are so that they can report non-compliance. Restrict the number of whale watch boats and fine them heavily when they are in noncompliance.
6. Work to reduce exotic species in the Sanctuary by enforcing existing precautions and reducing the disturbances caused by commercial shipping traffic.

Sincerely,
Alice Charkes
Brattleboro VT

From: hollyshelf@hotmail.com
To: sbplan@noaa.gov
Subject: Stand by the word SANCTUARY for Stellwagen Bank
Date: 07/25/2008 10:44:10 AM

Dear Superintendent McDonald,

A sanctuay should not include the destructive impacts of human activities including bottom trawling and commercial shipping. The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally outstanding ecological value -- it requires protection, not more human activity.

A new management plan must be put into place. Please consider all of these suggestions:

- Manage all commercial and recreational activities inside the Sanctuary;
- Immediately identify and protect vulnerable seafloor habitats from harmful bottom trawling and other harmful human activities;
- Protect herring, sand lance and other critical forage fish that provide a source of food for whales, tuna, cod, and other ocean wildlife;
- Inventory and protect maritime heritage sites;
- Improve monitoring and protection of water quality; and
- Manage shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

Stellwagen Bank must be considered a Sanctuary in action, not in theory. Please craft an effective management plan to protect and restore the diversity of the ocean wildlife of Stellwagen Bank Sanctuary.

Sincerely,

Holly Twining
67 Bennoch Road
Orono, ME 04473

From: Dorothy Cormier <dcormier731@yahoo.com>
To: sbplan@noaa.gov
Subject: SB draft management plan
Date: 07/23/2008 1:55:30 PM

from Dorothy Cormier

75 Moody Street

Manchester, NH

To those entrusted with the preservation and management of Stellwagen Bank as a sanctuary:

Please develop a plan that makes Stellwagen Bank a true sanctuary.

--Protect habitats from bottom trawling

--Protect sanctuary from fishing nets

--Control speeds of shipping vessels to protect whales

--Prohibit herring fishing

--Manage all the activity within the sanctuary to preserve and protect its ecology

From: macro3@juno.com <macro3@juno.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank Plan
Date: 07/21/2008 1:43:14 PM

Dear Friends, Please know that I support the Draft Management Plan which restores and protects the sanctuary's ecosystem. In particular, the container ship and other commercial ships need to reduce their speed when operating in the boundaries of the sanctuary.

May Cronin, RSM

From: tgregoire@suscom-maine.net
To: sbplan@noaa.gov
Subject: Need management plan that protects Stellwagon
Date: 07/21/2008 10:43:29 AM

Dear Superintendent McDonald,

Living in Maine, we know the great value of our oceans.

Today Stellwagen is a sanctuary in name only. The proposed management plan provides no real and immediate protections for ocean wildlife or habitat.

I urge you to develop a final management plan for Stellwagen Bank National Marine Sanctuary that:

- Manages all commercial and recreational activities inside the Sanctuary;
- Immediately identifies and protects vulnerable seafloor habitats from harmful bottom trawling and other harmful human activities;
- Protects herring, sand lance and other critical forage fish that provide a source of food for whales, tuna, cod, and other ocean wildlife;
- Inventories and protects maritime heritage sites;
- Improves monitoring and protection of water quality; and
- Manages shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

We need a management plan that will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Sincerely,

Tracy Gregoire
59 Ward Road
Topsham, ME 04086

From: Michael Ferro <harborbar@yahoo.com>
To: Electronically Mail Comments <sbplan@noaa.gov>
Subject: Electronically Mail Comments
Date: 07/20/2008 7:37:24 AM

Attachment N1: [Comment for SBNMS-Ewritten6-8.pdf](#)

Below you will find my comments regarding the SBNMS management plan. A PDF attachment accompanies the comments-showing the map schematics for fishing closure for SBNMS.

Thank you for accepting my comments.

Mike

Written Comment

for

Gerry E. Studds

Stellwagen Bank National Marine Sanctuary

Draft Management Plan

By

Mike Ferro

87 Searsville Road

South Dennis, MA

02660-3795

HARBORBAR@YAHOO.CO
M

Sanctuary Budget

(PLEASE SET THIS ACTION AS A ‘PRIORITY – HIGH’)

The current Sanctuary management plan budget has not taken the current economy forecast into account. Three factors to consider:

- Strength of the US dollar.
- Iraq war, and the treasury print money to pay for it.
- Petroleum prices.

Strength of the US dollar and petroleum prices are the factors that will hurt the 5-year budget the most. Therefore the bottom line of the budget should increase by 15-25%.

Sanctuary Revenue

(PLEASE SET THIS ACTION AS A ‘PRIORITY – HIGH’)

Revenues can be created on sanctuary protection intents. Charge all tanker ships and cruise lines that pass through a fee of \$ 200/ft. Assuming 1000 ft vessel, the fee would be \$200,000 is for round trip crossing of SBNMS. The fee will be paid prior to entering SBNMS.

Upon complying to the following regulations.

- Speed of 9 knots.
- Provide two (2) in water whale spotters one rear and one forward. Reporting to central recording whale spotter center.

Full compliance will gain a return of 75% of the fee. Non-compliance in any form will reduce the returnable money value. Speeding will get only 50% returned. Failure to comply with both only 5% will be returned.

All everyday smaller vessels will be fined for speed violations, the fine going directly to the ships' owner and Captain and operating business related to that vessel. That would be 3-fines for every violation. IE \$50 fine value equals \$150.

Automatic Identification System (AIS) could be modified to issue violators with a fine Automatically, thereby eliminating the cost of additional personnel.

Protection of whales

(PLEASE SET THIS ACTION AS A ‘**PRIORITY – HIGH**’)

Banning all ocean vessels from using the sanctuary is the best chance for Right Whale

recovery. Another practical way is to mandate propeller guards, and a maximum speed limit for all ships using SBNMS. Such mandates are to include all ocean crafts recreational and commercial, and of any size.

Outreach Program

(PLEASE SET THIS ACTION AS A ‘**PRIORITY – HIGH**’)

The outreach program has to be more reaching. My children ages 9 and 10, that would be 3rd & 5th grade, only know about SBNMS, because of the comments made by me regard the draft management plan (DMP). Another example of not knowing SBNMS happened at the local copy shop. The woman that made me a copy did not know where SBNMS was located. Her husband is a lobsterman, and he had not heard of the DMP and the commenting period regarding SBNMS management plan.

I suggest; SBNMS work with local libraries along the coast, and through out the state to create a SBNMS display, and suggest Sanctuary related reading for children’s reading hour to be done monthly. During the slow part of the season pick a grade where kids will be taken out on boats to see ocean life around Cape Cod. The cool thing about this is that most towns have a central dock allowing participating boats to pickup kids from their own town.

This increased effort will bring attention to the SBNMS and New England’s coastal waters. You are going have to get more support from the non-fishing general public succeed in getting MPAs instituted in SBNMS.

Expansion of SBNMS

(PLEASE SET THIS ACTION AS A ‘**PRIORITY – HIGH**’)

The future of SBNMS is **marine protected areas** (MPAs) that protect the SBNMS from any kind of recreational or commercial exploitation. In other words, ‘NO-TAKE MARINE ZONE’. In order to get any MPAs in place you will have to expand SBNMS boundaries. The proposal of adding Jeffery’s Ledge for boundary extension is a good start but not enough.

I suggest; Taking all of “Gulf of Maine” (GoM) Rolling Closure Areas - 3” (*map e. page 359 of SBNMS DM *.pdf version*) will be both a ‘bargaining’ area for future MPAs

negotiations, and cover a ocean floor area that has great diversity and somewhat under protection now. Move the present easterly boundary of the sanctuary out to the 200-mile limit. Take part of Cape Cod Bay to the 30ft contour, if possible. (I'm not sure how the state and federal boundary work in this area.)

Such action will allow future implementation of 'NO-TAKE MARINE ZONE'. Also, extending the burden of the SBNMS to include portions of the NH and ME coast.

'NO-TAKE MARINE ZONE'

(PLEASE SET THIS ACTION AS A 'PRIORITY – HIGH')

I suggest the marine protected areas (MPAs) be changed to 'NO-TAKE MARINE ZONE'. Definitions of MPAs have too many ambiguous meanings. While 'NO-TAKE MARINE ZONE' definition is clear, and without misinterpretation. The area of Stellwagen has been fished for 400+ years. It is amazing that fish are still being landed. The whole of "the sanctuary" is only 1% of U.S. owned GoM, and 0.001% of the eastern seaboard. That should give you an idea how little of our oceans are protected by National Marine Sanctuaries program.

Designating a 'NO-TAKE MARINE ZONE' for SBNMS that would be only 1% of GoM. Four hundred years of fishing with limited conservation actions it is amazing fish is still profitable. 'NO-TAKE MARINE ZONE' would allow the sea biodiversity to rebound to a natural state, a natural state that has not been seen in 400-years. Therefore any additional study regarding the precise placement of a 'NO-TAKE MARINE ZONE' would be pointless. A 'NO-TAKE MARINE ZONE' purpose is for total marine protection. The science has been around science 1989, simple in both design and logic. It is the right thing to do. I am suggesting-**Add rhetoric for implementation of 'NO-TAKE MARINE ZONE' for half of the sanctuary for 2009 and all of th sanctuary by 2011. Complete protection for forever with no human activity.**

The next three pages are maps giving different configuration options for placement of 'NO-TAKE MARINE ZONE'.

From: Susan Farady <susan.farady@verizon.net>
To: sbplan@noaa.gov
Subject: Ocean Conservancy comments on SBNMS DMP
Date: 07/17/2008 3:53:26 PM

Attachment N1: [OCcommentsltrhead_july08.doc](#)

Hi Craig

Please find attached our comments. Thank you.

Regards,

Susan

From: kaminc <kaminc@comcast.net>
To: sbplan@noaa.gov
Subject: SBNMS Comments
Date: 06/16/2008 5:12:07 PM

Attachment N1: [SBNMS Comments.doc](#)

Please find attached the comments of Frank Mirarchi, 67 Creelman Drive, Scituate, MA 02066. I will also submit a hard copy to the Sanctuary office in Scituate, Mass. Thank you. Sincerely, Frank Mirarchi

From: icthio03@comcast.net
To: sbplan@noaa.gov
Subject: No subject
Date: 06/11/2008 5:32:27 PM

This plan is nothing more than a Government land-grab. What "crisis" was the genesis for this ridiculous plan? Which 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 we'll need to impose also. 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** (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.

From: MIKE FERRO <harborbar@yahoo.com>
To: sbplan@noaa.gov
Subject: Help Make Stellwagen Bank a REAL Marine Sanctuary!
Date: 06/05/2008 9:13:45 AM

Jun 5, 2008

Superintendent Craig McDonald

Dear Superintendent MacDonald: Superintendent McDonald,

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of Stellwagen and the destructive impacts of human activities including bottom trawling and commercial shipping.

Today Stellwagen is a sanctuary in name only. The proposed management plan is woefully inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people.

I urge you to:

- Immediately STOP ALL COMMERCIAL AND RECREATIONAL HARVESTING IN Stellwagen Bank National Marine Sanctuary.

Stellwagen Bank National Marine Sanctuary IS ON 10% OF THE GULF OF MAINE (GoM). PROTECTING MEANS THAT 90% OF GULF OF MAIEN IS STILL AVAILABLE.

Stellwagen Bank National Marine Sanctuary HAS THE HIGHEST NUMBER OF FISH LANDING THAN ANY WHERE ELSE IN THE GoM, BY ELIMINATING ALL HARVESTING, MINING, AND ANY OTHER HUMAN DESTRUCTIVE ABILITY WILL SAVE GoM.

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,

Mr. MIKE FERRO
87 Sears village Rd
South Dennis, MA 02660-3795

From: Michael Ferro <harborbar@yahoo.com>
To: Superintendent SBNMS <sbplan@noaa.gov>, Governor Deval Patrick <Gov.Webmail@state.ma.us>, William Delahunt <William.Delahunt@mail.house.gov>, Brendan (GOV) O'Bryan <Brendan.O'Bryan@state.ma.us>, Ian A. Bowles <env.internet@state.ma.us>
Subject: SBNMS-COMMENT (01)-by-Mike Ferro
Date: 06/03/2008 9:16:35 AM

Help Make-Gerry E. Studds Stellwagen Bank National Marine Sanctuary-*A REAL Marine Sanctuary!*

Sanctuary: An animal sanctuary is a place where animals live and are protected. The term is used to mean a place of safety.

Dear Superintendent MacDonald: [Decision Maker],

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary (SBNMS) was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of (SBNMS) and the destructive impacts of human activities including bottom trawling and commercial shipping. Today (SBNMS) is a sanctuary in name only. The proposed management plan is inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Gerry E. Studds Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people.

I urge you to develop a final management plan for Stellwagen Bank National Marine Sanctuary that:

1. Immediately make the northerly quarter and the southerly quarter a No-Take Marine Zone.
2. Make adding Jeffery's ledgeManages all commercial and recreational activities inside the Sanctuary;
3. Immediately identifies and protects vulnerable sea floor habitats from harmfulbottom trawling and other harmful human activities;
4. Protects herring, sand lance and other critical forage fish that provide a sourceof food for whales, tuna, cod, and other ocean wildlife;
5. Inventories and protects maritime heritage sites; Improves monitoring and protection of water quality;
6. Manages shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

Stellwagen Bank can no longer be a Sanctuary in name only. I urge you to immediately apply #1. right now as apart of SBNMS current plan, and add #1. to next 5-year management plan under review. Adding "Immediately make the northerly quarter and the southerly quarter a No-Take Marine Zone will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Please honor the true intent of the sanctuary by creating it with all usage rules as our NATIONAL PARK SYSTEMS. Implement them now to get all those opposed to it to rear their 'not-so-good-looking' heads. This will allow those advocating for; to prepare for campaign with direction and teeth.

Thank you for your time.

Sincerely,

Michael Ferro
87 Searsville Rd. - So. Dennis

MA 02660-3795
HARBORBAR@YAHOO.COM

508-398-4447(h)

P.S.

On that subject below you will find links to PISCO - The Partnership for Interdisciplinary Studies of Coastal Oceans; PISCOWEB.org it is a quick and easy explanation of No-Take Marine Zone.

The information was done in 2002, and is still rings true today.

If your time is limited just check out the links to 'evidence' and 'spillover'.

The Science of Marine Reserves video (2002)

	<input type="checkbox"/>	broadband	<input type="checkbox"/>	modem
Introduction	<u>7.5MB</u>	<u>1.8MB</u>	<u>5.9MB</u>	<u>1.4MB</u>
Changing Perspectives	<u>15MB</u>	<u>3.7MB</u>	<u>12MB</u>	<u>2.8MB</u>
Many Problems, One Tool	<u>7.3MB</u>	<u>1.8MB</u>	<u>5.7MB</u>	<u>1.3MB</u>

The Evidence	<u>15MB</u>	<u>3.7MB</u>	<u>11MB</u>	<u>2.7MB</u>
Rate of Change	<u>11MB</u>	<u>2.6MB</u>	<u>8.3MB</u>	<u>2.0MB</u>
Spillover and Export	<u>16MB</u>	<u>3.9MB</u>	<u>12MB</u>	<u>2.9MB</u>
Reserve Networks	<u>23MB</u>	<u>5.7MB</u>	<u>18MB</u>	<u>4.2MB</u>
Conclusion	<u>5.9MB</u>	<u>1.5MB</u>	<u>4.7MB</u>	<u>1.1MB</u>

Thank you for your time, and efforts.

Sincerely,

Mike

Michael Ferro
 87 Searsville Rd.
 So. Dennis, MA
 02660-3795
HARBORBAR@YAHOO.COM
 508-398-4447(h)

From: Michael Ferro <harborbar@yahoo.com>
To: Superintendent SBNMS <sbplan@noaa.gov>, Governor Deval Patrick <Gov.Webmail@state.ma.us>, William Delahunt <William.Delahunt@mail.house.gov>, Brendan (GOV) O'Bryan <Brendan.O'Bryan@state.ma.us>, Ian A. Bowles <env.internet@state.ma.us>
Subject: SBNMS-COMMENT (01)-by-Mike Ferro
Date: 06/03/2008 9:16:35 AM

Help Make-Gerry E. Studds Stellwagen Bank National Marine Sanctuary-*A REAL Marine Sanctuary!*

Sanctuary: An animal sanctuary is a place where animals live and are protected. The term is used to mean a place of safety.

Dear Superintendent MacDonald: [Decision Maker],

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary (SBNMS) was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of (SBNMS) and the destructive impacts of human activities including bottom trawling and commercial shipping. Today (SBNMS) is a sanctuary in name only. The proposed management plan is inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Gerry E. Studds Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people.

I urge you to develop a final management plan for Stellwagen Bank National Marine Sanctuary that:

1. Immediately make the northerly quarter and the southerly quarter a No-Take Marine Zone.
2. Make adding Jeffery's ledgeManages all commercial and recreational activities inside the Sanctuary;
3. Immediately identifies and protects vulnerable sea floor habitats from harmfulbottom trawling and other harmful human activities;
4. Protects herring, sand lance and other critical forage fish that provide a sourceof food for whales, tuna, cod, and other ocean wildlife;
5. Inventories and protects maritime heritage sites; Improves monitoring and protection of water quality;
6. Manages shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

Stellwagen Bank can no longer be a Sanctuary in name only. I urge you to immediately apply #1. right now as apart of SBNMS current plan, and add #1. to next 5-year management plan under review. Adding "Immediately make the northerly quarter and the southerly quarter a No-Take Marine Zone will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Please honor the true intent of the sanctuary by creating it with all usage rules as our NATIONAL PARK SYSTEMS. Implement them now to get all those opposed to it to rear their 'not-so-good-looking' heads. This will allow those advocating for; to prepare for campaign with direction and teeth.

Thank you for your time.

Sincerely,

Michael Ferro
87 Searsville Rd. - So. Dennis

MA 02660-3795
HARBORBAR@YAHOO.COM

508-398-4447(h)

P.S.

On that subject below you will find links to PISCO - The Partnership for Interdisciplinary Studies of Coastal Oceans; PISCOWEB.org it is a quick and easy explanation of No-Take Marine Zone.

The information was done in 2002, and is still rings true today.

If your time is limited just check out the links to 'evidence' and 'spillover'.

The Science of Marine Reserves video (2002)

	<input type="checkbox"/>	broadband	<input type="checkbox"/>	modem
Introduction	<u>7.5MB</u>	<u>1.8MB</u>	<u>5.9MB</u>	<u>1.4MB</u>
Changing Perspectives	<u>15MB</u>	<u>3.7MB</u>	<u>12MB</u>	<u>2.8MB</u>
Many Problems, One Tool	<u>7.3MB</u>	<u>1.8MB</u>	<u>5.7MB</u>	<u>1.3MB</u>

The Evidence	<u>15MB</u>	<u>3.7MB</u>	<u>11MB</u>	<u>2.7MB</u>
Rate of Change	<u>11MB</u>	<u>2.6MB</u>	<u>8.3MB</u>	<u>2.0MB</u>
Spillover and Export	<u>16MB</u>	<u>3.9MB</u>	<u>12MB</u>	<u>2.9MB</u>
Reserve Networks	<u>23MB</u>	<u>5.7MB</u>	<u>18MB</u>	<u>4.2MB</u>
Conclusion	<u>5.9MB</u>	<u>1.5MB</u>	<u>4.7MB</u>	<u>1.1MB</u>

Thank you for your time, and efforts.

Sincerely,

Mike

Michael Ferro
 87 Searsville Rd.
 So. Dennis, MA
 02660-3795
HARBORBAR@YAHOO.COM
 508-398-4447(h)

From: MICHAEL E. FERRO <harborbar@yahoo.com>
To: sbplan@noaa.gov
Subject: Help Make Stellwagen Bank a REAL Marine Sanctuary!
Date: 06/03/2008 9:06:28 AM

Jun 3, 2008

Superintendent Craig McDonald

Dear Superintendent MacDonald: Superintendent McDonald,

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of Stellwagen and the destructive impacts of human activities including bottom trawling and commercial shipping. Today Stellwagen is a sanctuary in name only. The proposed management plan is woefully inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people. I urge you to develop a final management plan for Stellwagen Bank National Marine Sanctuary that:

1. Immediately make the northerly quarter and the southerly quarter a No-Take Marine Zone.
2. Manages all commercial and recreational activities inside the Sanctuary;
3. Immediately identifies and protects vulnerable sea floor habitats from harmful bottom trawling and other harmful human activities;
4. Protects herring, sand lance and other critical forage fish that provide a source of food for whales, tuna, cod, and other ocean wildlife;
5. Inventories and protects maritime heritage sites; Improves monitoring and protection of water quality;
6. Manages shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

Stellwagen Bank can no longer be a Sanctuary in name only. I urge you to immediately apply #1. right now as apart of SBNMS current plan, and add #1. to next 5-year management plan under review. Adding "Immediately make the northerly quarter and the southerly quarter a No-Take Marine Zone will fully protect and restore the diversity of the ocean wildlife that call Stellwagen Bank Sanctuary home.

Please honor the true intent of the sanctuary by creating it with all usage rules as our NATIONAL PARK SYSTEMS. Implement them now to get all those opposed to it to rear their 'not-so-good-looking' heads. This will allow those advocating for; to prepare for campaign with direction and teeth.

Please look at the following:

On that subject below you will find links to PISCO - The Partnership for Interdisciplinary Studies of Coastal Oceans; PISCOWEB.org it is a quick and easy explanation of No-Take Marine Zone.

The information was done in 2002, and is still rings true today.

If your time is limited just check out the links to 'evidence' and 'spillover'.

The Science of Marine Reserves video (2002)

PISCOWEB.org - <http://www.piscoweb.org/outreach/pubs/reserves>
(following links uses Windows Media Player)

Introduction -

http://www.piscoweb.org/files/reserves/movies/1.1_Intro.wmv

Changing Perspectives -

http://www.piscoweb.org/files/reserves/movies/2_Changing_perspective.wmv

Many Problems, One Tool -

http://www.piscoweb.org/files/reserves/movies/3_One_Tool.wmv

The Evidence -

http://www.piscoweb.org/files/reserves/movies/4_Evidence.wmv

Rate of Change -

http://www.piscoweb.org/files/reserves/movies/5_Rate_of_Change.wmv

Spillover and Export -

http://www.piscoweb.org/files/reserves/movies/4_Evidence.wmv

Reserve Networks -

http://www.piscoweb.org/files/reserves/movies/7_Reserve_Networks.wmv

Conclusion -

http://www.piscoweb.org/files/reserves/movies/8_Credits.wmv

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,

Mr. MICHAEL E. FERRO

87 Searsville Rd

South Dennis, MA 02660-3795

From: Philip Johnson <philipjohnson@gmail.com>
To: sbplan@noaa.gov
Subject: Help Make Stellwagen Bank a REAL Marine Sanctuary!
Date: 06/03/2008 8:36:25 AM

Jun 3, 2008

Superintendent Craig McDonald

Dear Superintendent MacDonald: Superintendent McDonald,

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of Stellwagen and the destructive impacts of human activities including bottom trawling and commercial shipping. Today Stellwagen is a sanctuary in name only. The proposed management plan is woefully inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people. I urge you to develop a final management plan for Stellwagen Bank National Marine Sanctuary that:

- Manages all commercial and recreational activities inside the Sanctuary;
- Immediately identifies and protects vulnerable seafloor habitats from harmful bottom trawling and other harmful human activities;
- Protects herring, sand lance and other critical forage fish that provide a source of food for whales, tuna, cod, and other ocean wildlife;
- Inventories and protects maritime heritage sites;
- Improves monitoring and protection of water quality; and
- Manages shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

While it's too bad the fishing industry might be affected by further restrictions, let's all recognize the obvious fact that commercial fisheries are not sustainable the way they're currently managed, and we must do what's possible to protect the few remaining resources in the Atlantic.

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,

Mr. Philip Johnson
8 Inverness Rd
Wellesley, MA 02481-6115

From: Chalmers Hardenbergh <editor@atlanticnortheast.com>
To: sbplan@noaa.gov
Subject: Help Make Stellwagen Bank a REAL Marine Sanctuary!
Date: 06/02/2008 3:33:02 PM

Jun 2, 2008

Superintendent Craig McDonald

Dear Superintendent MacDonald: Superintendent McDonald,

The Gerry E. Studds Stellwagen Bank National Marine Sanctuary was designated in 1992 in recognition of its nationally outstanding ecological value and the need to protect this ocean treasure for future generations. However, the recently released draft sanctuary management plan paints a grim picture of Stellwagen and the destructive impacts of human activities including bottom trawling and commercial shipping.

Today Stellwagen is a sanctuary in name only. The proposed management plan is woefully inadequate and provides no real and immediate protections for ocean wildlife or habitat. This must change for Stellwagen Bank National Marine Sanctuary to live up to its name and deliver on its ocean stewardship responsibility to the American people. I LIVE IN MAINE, where many make their living from fishing. However, it's clear that we must reduce fishing. Start with Stellwagen!

I urge you to develop a final management plan for Stellwagen Bank National Marine Sanctuary that:

- Manages all commercial and recreational activities inside the Sanctuary;
- Immediately identifies and protects vulnerable seafloor habitats from harmful bottom trawling and other harmful human activities;
- Protects herring, sand lance and other critical forage fish that provide a source of food for whales, tuna, cod, and other ocean wildlife;
- Inventories and protects maritime heritage sites;
- Improves monitoring and protection of water quality; and
- Manages shipping, fishing and whale watching boats to stop endangered whales from being disturbed, entangled or killed while they try to raise and feed their young.

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,

Mr. Chalmers Hardenbergh
162 Main St

Yarmouth, ME 04096-6712

From: mylespost@libero.it <mylespost@libero.it>
To: none
Subject: Congratulation!!!
Date: 05/07/2008 7:55:06 PM

From: Mickelson, Mike <Mike.Mickelson@mwra.state.ma.us>
To: sbplan@noaa.gov
Subject: FW: Stellwagen Bank Sanctuary Draft Plan Released
Date: 05/07/2008 5:56:26 PM

Dear Craig,

I have 4 specific comments on the draft management plan, in addition to congratulating you for a job well done.

1) p58. "... the highest concentration of Alexandrium cysts was recorded in the sediment of the sanctuary." Is this true? Even if it is, it lacks the proper context. You should check it with Don Anderson.

2) p162. "Figure 110. Location of two separate Liquefied Natural Gas (LNG) deepwater ports..."

I believe that your coordinates for the Neptune LNG buoys are wrong. Northeast gateway is OK

Neptune (proposed):

North Buoy: Lat N 42 deg 29' 13", Long W 70 deg 36' 30"

South Buoy: Lat N 42 deg 27' 21", Long W 70 deg 36' 07"

Northeast Gateway (as-built):

Buoy A: 42° 23' 38.46" N/ 70° 35' 31.02" W

Buoy B: 42° 23' 56.40" N/ 70° 37' 0.36" W

So please correct your figure and avoid propagation of the remarkably widespread confusion about those coordinates.

3) You could have mentioned your collaboration with Seakeepers to outfit the RV Auk with underway-sampling sensors.

4) One of the most important sources of data we have is NOAA Buoy 44013, operated by NDBC. You forgot to mention it! A nod to NDBC might help continue funding of that buoy.

Thanks

Mike

Dr Michael J Mickelson
MWRA Building 39; 100 1ST AVE
Boston MA 02129
mike.mickelson@mwra.state.ma.us
(617)788-4951 desk; -4888 FAX
(617)549-8336 cell
<http://www.mwra.state.ma.us/harbor/html/bhrecov.htm>

-----Original Message-----

From: GOMMPAS@willamette.nos.noaa.gov [mailto:GOMMPAS@willamette.nos.noaa.gov]
Sent: Tuesday, May 06, 2008 6:27 AM
To: Gulf of Maine MPA
Cc: sbplan@noaa.gov
Subject: Stellwagen Bank Sanctuary Draft Plan Released

Dear Interested Party-

The National Oceanic and Atmospheric Administration is pleased to announce the release of the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary. The document can be accessed at <http://stellwagen.noaa.gov>. If you wish to comment on the plan, please follow the instructions on the Web site and submit your comments by close of business on August 4, 2008 (postmarked by August 4th, if mailing). Additionally on this Web site, you will find a link to a special edition of the Banknotes newsletter, which serves as a 32-page summary of the Draft Management Plan.

You are receiving this message because you attended one of the sanctuary's scoping meetings in 2002 for the management plan review, sent us an e-mail during the official scoping comment period, or expressed an interest in the sanctuary. If you would like to be removed from this list, please use your reply button and type "remove" in the subject line. Thank you.

GoMMPAS

List moderators:

Ben Cowie-Haskell/Stellwagen Bank National Marine Sanctuary, USA
Email: ben.haskell@noaa.gov
Phone: (781)545-8026 x207

Derek Fenton/ Department of Fisheries and Oceans Canada
Email: fentond@mar.dfo-mpo.gc.ca
Phone: (902) 426-2201

Web Site: [/stellwagen.nos.noaa.gov](http://stellwagen.nos.noaa.gov)

From: Cwenapco@aol.com
To: sbplan@noaa.gov
Subject: Re: Stellwagen Bank Sanctuary Draft Plan Released
Date: 05/06/2008 9:42:08 PM

Pine, do you comment on this?

Wondering what's for Dinner Tonight? [Get new twists on family favorites at AOL Food.](#)

From: Representative Stephen Lynch <ma09ima.pub@mail.house.gov>
To: sbplan@noaa.gov
Subject: Responding to your message
Date: 05/06/2008 6:41:35 AM

Thank you for your email. Please know that I appreciate you taking the time to share your views on this important issue. As always, I will keep your comments and concerns in mind as this issue continues to develop in the 110th Congress.

Please note that if this is an emergency or a time-sensitive issue, please contact my Boston office at 617-428-2000, and a member of my staff would be happy to help you.

Again, thank you for your email. Please don't hesitate to contact me in the future regarding this or any other issue.

Sincerely,

Stephen F. Lynch
Member of Congress

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: Fwd: MMC draft comments on Stellwagen Bank Mgt. Plan
Date: 10/10/2008 3:49:34 PM

Attachment N1: 8-14-08_C MacDonald, Stellwagen Bank Sanctuary mgmt plan.pdf

--

----- Original Message -----

Subject: Fwd: MMC draft comments on Stellwagen Bank Mgt. Plan
Date: Fri, 15 Aug 2008 08:53:21 -0400
From: Nathalie Ward
To: Craig Macdonald , Ben Cowrie-Haskell

From: Kassandra Cerveny <Kassandra.Cerveny@mcbi.org>

To: sbplan@noaa.gov

Subject: Stell public comments

Date: 10/10/2008 11:00:45 AM

Attachment N1: [image001.gif](#)

Attachment N2: [image002.jpg](#)

Attachment N3: [2008_3_10_Stellwagen_Public_Comments.docx](#)

Dear Sir or Madam,

We recently submitted comments for the draft management plan. It has come to my attention, that due to a file naming error, there track changes still visible in our final document. Please accept this copy – the only change is that the track changes have been removed.

Thank you for your understanding in this matter and please accept our apologies for not catching this earlier,

Kc



Kassandra Cerveny, Congressional Relations Manager
Marine Conservation Biology Institute
600 Pennsylvania Ave SE, Suite 210
Washington DC 20003 USA
(202) 546-5346
Kassandra.Cerveny@mcbi.org
www.mcbi.org

Protecting Ocean Life through Science and Conservation Advocacy

From: Kassandra Cerveny

Sent: Friday, October 03, 2008 4:27 PM

To: 'sbplan@noaa.gov'

Cc: Kassandra Cerveny; William Chandler; Emily Douce

Subject:

Please find attached public comments concerning the Stellwagen national Marine Sanctuary Draft Management Plan.

Thank you,

Kc



Kassandra Cerveny, Congressional Relations Manager
Marine Conservation Biology Institute
600 Pennsylvania Ave SE, Suite 210
Washington DC 20003 USA
(202) 546-5346
Kassandra.Cerveny@mcbi.org
www.mcbi.org

Protecting Ocean Life through Science and Conservation Advocacy

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: Sanctuary DMP comments
Date: 10/06/2008 2:22:42 PM

Attachment N1: [DMPCommentsWDCS_NS_08.pdf](#)

Additional comments for DMP list. Craig

----- Original Message -----

Subject: Sanctuary DMP comments
Date: Fri, 03 Oct 2008 18:18:14 +0100
From: Regina Asmutis-Silvia
To: Craig.MacDonald@noaa.gov
CC: heather@nantucketsoundkeeper.org

Dear Craig- thank you for the opportunity to comment on the Sanctuary's Draft Management Plan. Please consider the attached comments submitted on behalf of the Whale and Dolphin Conservation Society and the Nantucket Soundkeeper.

Sincerely,
Regina Asmutis-Silvia
Senior Biologist
WDCS
7 Nelson Street
Plymouth, MA 02360
508-746-2522

From: angela sanfilippo <asanfilippo@mass-fish.org>
To: sbplan@noaa.gov
Subject: GFWA comments on Stellwagen Bank National Marine Sanctuary
Date: 10/03/2008 8:31:59 PM

Attachment N1: [GFWA.doc](#)

Attachment N2: [Fishermen's Wives Stellwagen Comments October 3 2008.doc](#)

Please find attached cover letter and comments to the Stellwagen Bank National Marine Sanctuary from the Gloucester Fishermen's Wives Association.

Angela Sanfilippo

GFWA President

From: jackie odell <jackie_odell@yahoo.com>
To: sbplan@noaa.gov
Subject: Stellwagen Bank Draft Management Plan
Date: 10/03/2008 6:22:23 PM

Attachment N1: [NSC Final Comments Stellwagen October 2008.doc](#)

To Whom It May Concern:

Please find the comments by the Northeast Seafood Coalition for the Stellwagen Bank Draft Management Plan enclosed.

Sincerely,
Jackie Odell

From: Priscilla Brooks <pbrooks@clf.org>
To: sbplan@noaa.gov, Craig MacDonald <Craig.MacDonald@noaa.gov>
Subject: CLF Comments on SBNMS DMP
Date: 10/03/2008 4:59:21 PM

Attachment N1: [CLF Comments, Stellwagen Draft Management Plan.pdf](#)

Dear Dr. MacDonald:

On behalf of the Conservation Law Foundation please accept the attached comments on the Stellwagen Bank National Marine Sanctuary Draft Management Plan and Environmental Assessment.

Sincerely,

Priscilla M. Brooks

Priscilla M. Brooks, Ph.D.

Director, Ocean Conservation Program

Conservation Law Foundation

62 Summer Street

Boston, MA 02110

(617) 350-0990 x737

www.clf.org

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: Comments on the Draft Management Plan for Stellwagen Bank
Date: 10/03/2008 4:46:58 PM

Attachment N1: [commentsDraftMgmtPlanStellwagen_DR.pdf](#)

----- Original Message -----

Subject: comments on the Draft Management Plan for
Stellwagen Bank
Date: Fri, 03 Oct 2008 13:29:06 -0700 (PDT)
From: Yolanda Leon <ymlleon@yahoo.com>
To: Craig.MacDonald@noaa.gov
CC: Elizabeth.Stokes@noaa.gov

Dear Dr. MacDonald, please find attached my letter with comments on the Draft Management Plan for Stellwagen Bank National Marine Sanctuary

Best,
Y.

Yolanda M. Leon, PhD
Universidad INTEC y Grupo Jaragua
Santo Domingo, Rep Dominicana (Dominican Rep)
e. ymlleon@intec.edu.do
t. +1 809 567 9271 x426
f. +1 809 566 3200

From: Mary Beth Tooley <mbtooley@roadrunner.com>
To: sbplan@noaa.gov
Subject: Comments on Draft Plan
Date: 10/03/2008 4:39:51 PM

Attachment N1: [SBNMS Draft Plan Fianl.doc](#)

Please see attached comments on the Draft Management Plan for SBNMS. Please feel free to contact me if you have any concerns or questions.

Mary Beth Tooley

Small Pelagic Group

207-763-4176

From: Pat Hughes <phughes@coastalstudies.org>
To: Craig.MacDonald@noaa.gov
Subject: Provincetown Center for Coastal Studies comments
Date: 10/03/2008 4:05:00 PM

Attachment N1: [PCCS_comments_StellwagenDMP_3X_08.doc](#)

Hi Craig~

Attached are the Center's comments on the draft management plan. We will send a signed paper copy next week.

It was great to meet you and to see Nathalie again. I look forward to working with you both!

Cheers~ Pat

Pat Hughes
Marine Policy Coordinator
Provincetown Center for Coastal Studies
5 Holway Street
Provincetown, Massachusetts 02657
Phone: 508 487 3623, extension 121

From: jennifer@stellwagenalive.org
To: sbplan@noaa.gov
Subject: comments on budget
Date: 10/03/2008 4:05:00 PM

Attachment N1: [JBF_DMP_public_comments.doc](#)

Hi Dad,

I have an appointment at Harvard to possibly start teaching in the extension school in a couple of weeks.

Attached is a public comment I made for work! (Just an FYI)

xox

me

Jennifer Bender Ferre Ph.D.



Executive Director

Stellwagen Alive
PO Box 300130
Boston, MA. 02130
617 522-1838

From: Boeri, Robert (EEA) <Robert.Boeri@state.ma.us>
To: sbplan@noaa.gov
Subject: MCZM Draft Management Plan Comments
Date: 10/03/2008 3:17:42 PM

Attachment N1: [SBNMS Draft Management Plan 10-01-08 - signed.pdf](#)

Good Afternoon Dr. MacDonald,

I am pleased to submit the comments of the Massachusetts Office of Coastal Zone Management relating to the Stellwagen Bank National Marine Sanctuary's Draft Management Plan and Environmental Assessment. The comments are attached. Please feel free to contact me should you have any questions.

Regards,

Bob Boeri

Robert L. Boeri

Project Review Coordinator

The Massachusetts Office of Coastal Zone Management

251 Causeway Street, Suite 800

Boston, MA 02114-2138

phone: 617-626-1050

fax: 617-626-1240

email: Robert.Boeri@state.ma.us

From: Karen Roy <KRoy@NEFMC.ORG>
To: sbplan@noaa.gov
Subject: SBNMS draft amendment plan comments
Date: 10/03/2008 3:01:58 PM

Attachment N1: [081003_Craig MacDonald re SBNMS comments.pdf](#)

Attached our our comments re the draft plan. A hard copy will be placed in this mail this date.

Regards, Karen

<<081003.Craig MacDonald re SBNMS comments.pdf>>

Karen Roy
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950
kroy@nefmc.org
Phone: 978/465-0492 * Fax: 978/465-3116
><{{{{(*> ><{{{(*> ><{{{(*>

From: Sally J. Yozell <syozell@tnc.org>
To: sbplan@noaa.gov
Subject: TNC's DMP comments
Date: 10/03/2008 2:58:59 PM

Attachment N1: [emailsig_pixel.gif](#)
Attachment N2: [emailsig_logo.gif](#)
Attachment N3: [Stellwagen DMP comments_oct_3_final.doc](#)

Craig,

Please find the Nature Conservancy's comments on the Stellwagen Bank National Marine Sanctuary Draft Management Plan,

thank you,

Sally

Sally Yozell

*Director of
Marine
Conservation,
Eastern U.S.
Region*

syozell@tnc.org
g
(617)
542-1908 Ext.
232 (Phone)
(202)
320-0929
(Mobile)
(617)
542-1620
(Fax)

nature.org

**The Nature
Conservancy
Eastern
Resource
Office**

11 Avenue De
Lafayette
5th Floor
Boston, MA
02111



Protecting nature. Preserving life.™

From: angela sanfilippo <asanfilippo@mass-fish.org>
To: sbplan@noaa.gov
Subject: SBNMS
Date: 10/03/2008 2:55:57 PM

Attachment N1: [MFP Stellwagen Comments October 3 2008.doc](#)

Please find attached the SBNMS comments.

Angela Sanfilippo

MFP Executive Director

From: sigreen@bu.edu
To: sbplan@noaa.gov
Subject: Comments
Date: 10/03/2008 2:46:20 PM

Attachment N1: [mgmt_plan.doc](#)

Susan Green
215-260-6980
sigreen@bu.edu
Boston University Student

From: Sean Cosgrove <SCosgrove@clf.org>
To: sbplan@noaa.gov
Subject: Comment Letter for DMP and EA
Date: 10/03/2008 1:26:14 PM

Attachment N1: [Final - Stellwagen Bank NMS org sign-on letter 10-3-08.pdf](#)

Superintendent McDonald:

Please consider the attached letter from 14 conservation groups as official comments on the Stellwagen Bank Draft Management Plan and Environmental Assessment.

Sincerely,

Sean Cosgrove

Sean Cosgrove

Marine Campaign Director

Conservation Law Foundation

From: Noah Chesnin <Nchesnin@clf.org>
To: sbplan@noaa.gov
Subject: SBNMS Letters and Petition from New England Citizens
Date: 10/03/2008 1:09:52 PM

Attachment N1: [Stellwagen Letters and Petition from New England Citizens.PDF](#)

Dear Superintendent MacDonald,

Attached you will find an electronic copy of a cover letter from Sean Cosgrove of the Conservation Law Foundation, as well as twenty nine comment letters and fifteen petitions from citizens from across New England. The original copies of each document are in the mail. Please include these documents in the official record for the comments regarding the Draft Management Plan and Environmental Assessment for the Sanctuary.

Thank you,

Noah

Noah Chesnin

Program Assistant

Conservation Law Foundation

62 Summer Street, Boston, MA 02110

phone: 617.850.1753 | fax: 617.350.4030 | web: clf.org

[Click here](#) to become a CLF e-advocate! You'll receive action alerts and CLF's monthly e-newsletter keeping you up-to-date with our work to protect New England's environment.

From: Mastone, Victor (EEA) <Victor.Mastone@state.ma.us>
To: sbplan@noaa.gov
Subject: Comments on SBNMS Draft Management Plan
Date: 10/03/2008 10:39:31 AM

Attachment N1: [SBNMS_2008_Draft_plan_comments.pdf](#)

Attached below are the comments submitted by BUAR on the SBNMS Draft Management Plan.

<<SBNMS_2008_Draft plan_comments.pdf>>

Victor T. Mastone
Director and Chief Archaeologist
Board of Underwater Archaeological Resources
251 Causeway Street, Suite 800
Boston, MA 02114
Direct Line: 617-626-1141
Fax line: 617-626-1240
Email: victor.mastone@state.ma.us
Website: www.mass.gov/czm/buar/index.htm

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: [Fwd: [Fwd: Stellwagen letter]]]
Date: 10/03/2008 9:12:48 AM

Attachment N1: [Stellwagen.pdf](#)

----- Original Message -----

Subject: [Fwd: [Fwd: Stellwagen letter]]
Date: Thu, 02 Oct 2008 18:17:02 -0400
From: Craig MacDonald <Craig.MacDonald@noaa.gov>
To: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>

DMP comment file

----- Original Message -----

Subject: [Fwd: Stellwagen letter]
Date: Thu, 02 Oct 2008 17:55:14 -0400
From: Jonathan.Kelsey <Jonathan.Kelsey@noaa.gov>
To: John Armor <John.Armor@noaa.gov>, Craig MacDonald
<Craig.MacDonald@noaa.gov>, Matt Stout <Matthew.Stout@noaa.gov>, Dan
Basta <Dan.Basta@noaa.gov>, Margo Jackson <Margo.E.Jackson@noaa.gov>

FYI - Letter from Senator Kerry (D-MA) regarding the Stellwagen Bank NMS draft management plan.

JK

From: capcraig@bu.edu
To: sbplan@noaa.gov
Subject: Comments for Draft Management Plan- Caitlin Craig
Date: 10/03/2008 7:09:33 AM

Attachment N1: [CaitlinCraigcomments.doc](#)

This message is in MIME format.

From: Dale Brown <daletb@verizon.net>
To: sbplan@noaa.gov
Subject: Comments on SBNMS Draft Management Plan
Date: 10/02/2008 5:24:05 PM

Attachment N1: [Comments on Stellwagen Bank National Marine Sanctuary.doc](#)

Attached are my comments on the Draft Management Plan for the Stellwagen Bank National Marine Sanctuary.

Thank you.

Dale Brown

Sanctuary Advisory Committee, At-Large Member

Stellwagen Bank National Marine Sanctuary

37 Beacon Street

Gloucester, MA 01930

978 281-4104

daletb@verizon.net

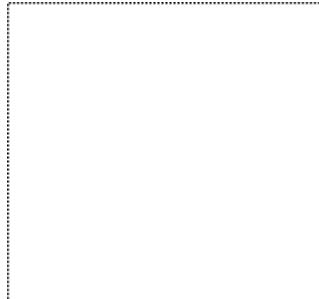
From: jennifer@stellwagenalive.org
To: sbplan@noaa.gov
Subject: Fwd: SA public comments attached
Date: 10/02/2008 5:23:48 PM

Attachment N1: [SA_public_commentsfinal.doc](#)

This is Stellwagen Alive's collective comments -
The board not me -

Richard Wheeler
John Williamson
Sandi McKinley
Michael Cohen
PO Box 300130
Boston, MA. 02130

Jennifer Bender Ferre Ph.D.



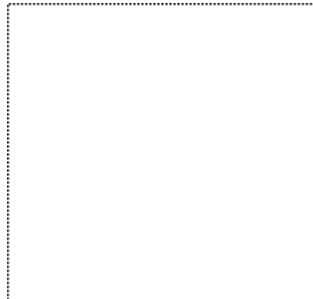
Executive Director

Stellwagen Alive
PO Box 300130
Boston, MA. 02130
617 522-1838

-----Original Message-----

From: jennifer@stellwagenalive.org [mailto:jennifer@stellwagenalive.org]
Sent: Thursday, October 2, 2008 02:45 PM
To: sbplan@noaa.gov
Subject: SA public comments attached

Jennifer Bender Ferre Ph.D.



Executive Director

Stellwagen Alive
PO Box 300130

Boston, MA. 02130
617 522-1838

From: Mason Weinrich <mason@whalecenter.org>
To: sbplan@noaa.gov, 'Craig Macdonald' <Craig.MacDonald@noaa.gov>
Subject: Whale Center Comments Supplement
Date: 10/01/2008 11:39:27 AM

Attachment N1: [Stellwagen DMP Comments Final - Supplement.pdf](#)

Whoops – forgot one important issue. Supplementary comments attached.

- Mason

Mason Weinrich

mason@whalecenter.org

Whale Center of New England

www.whalecenter.org

From: Gib <Gib5@charter.net>
To: sbplan@noaa.gov
Subject: Stellwagen DMP Review comments
Date: 09/30/2008 8:39:16 PM

Attachment N1: [SBNMS Review ltr sept_ 29, 2008.doc](#)
Attachment N2: [Stellwagen DMP Review Letter 2008.doc](#)

To whom it may concern:

Attached are two letters with my comments on the Stellwagen Bank NMS Draft Management Plan.

Gib Chase

former SAC Associate

From: Mason Weinrich <mason@whalecenter.org>
To: sbplan@noaa.gov
Subject: Whale Center of New England Comments on SBNMS Draft Management Plan
Date: 09/30/2008 3:50:23 PM

Attachment N1: [Stellwagen DMP Comments Final.pdf](#)

Hi –

Our comments are attached. Please send an acknowledgement that the comments have been received and opened so that we can rest assured they will be addressed.

Thank you and we look forward to moving forward in this process.

- Mason

Mason Weinrich

mason@whalecenter.org

Whale Center of New England

www.whalecenter.org

From: Distel, Dan <distel@oglf.org>
To: sbplan@noaa.gov
Subject: Comment on SBMP
Date: 09/30/2008 12:05:09 PM

Attachment N1: [StellwagenComment.doc](#)

Dear Dr. MacDonald,

I have attached a letter of comment regarding the Stellwagen Bank Draft Management Plan.

Best wishes,

Dan

Daniel L. Distel, Ph.D.
Executive Director, Ocean Genome Legacy
240 County Rd., Ipswich, MA 01938
978-380-7425
distel@oglf.org
<http://www.oglf.org>

From: Emily Collins <emilytc@gmail.com>
To: sbplan@noaa.gov
Subject: draft management comment form
Date: 09/29/2008 4:46:05 PM

Attachment N1: [SBNMS_DraftPlanCommentForm_emilycollins.doc](#)

9.29.08
emily collins

From: Chase, Alison <achase@nrdc.org>
To: sbplan@noaa.gov
Subject: Stellwagen Bank Comments
Date: 09/29/2008 1:31:56 PM

Attachment N1: [stellwagen_comments_9-29-08.pdf](#)

We noticed an inadvertent factual error in our comments that were submitted on Sept. 15. We have revised our comments to address this inaccuracy; the new version is attached. It would be greatly appreciated if you would please substitute this letter for our previous comments.

Please feel free to call me with any questions at 212.727.4551.

Sincerely,

Ali Chase

Alison Chase

Policy Analyst

Natural Resources Defense Council

40 West 20th Street

New York, NY 10011

Phone: 212.727.4551

Fax: 212.727.1773

achase@nrdc.org

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law as attorney work-product, or as attorney-client or otherwise confidential communication. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, copying, or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, immediately notify us at the above telephone number and delete or destroy it and any copies. Thank you.

From: Young, Suzanne
Sent: Monday, September 15, 2008 11:32 AM
To: 'sbplan@noaa.gov'
Cc: Chase, Alison
Subject: Stellwagen Bank Comments

Please see attached letter signed Sarah Chasis of NRDC, comments regarding the Stellwagen Bank National Marine Sanctuary Draft Management Plan.

Suzanne Young (on behalf of Sarah Chasis)

Program Assistant, NY-NJ Harbor Bight

Natural Resources Defense Council (NRDC)

40 W. 20th St.

New York, NY 10011

212-727-4419

P Please consider the environment before printing this email P

From: Lijo Chacko <lchacko@bu.edu>

To: sbplan@noaa.gov

Subject: Comments

Date: 09/29/2008 1:08:27 PM

Attachment N1: [SBNMS_DraftPlanCommentForm_Lijo_Chacko.doc](#)

To Whom it May Concern,
I have attached my comments about the SBNMS draft plan.

Sincerely,

Lijo Chacko

From: adyanr@bu.edu
To: sbplan@noaa.gov
Subject: Draft Mamangement Comments
Date: 09/29/2008 12:29:03 PM

Attachment N1: [Rios_2008Draft_Management_Comments.doc](#)

Attached are my comments to the SBNMS draft management plan.

Sincerely,

Adyan Rios
adyanr@bu.edu

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: PUBLIC COMMENTS FOR SBNMS's DRAFT MANAGEMENT PLAN]
Date: 09/29/2008 9:23:42 AM

Attachment N1: [SMMRD Letter.pdf](#)

----- Original Message -----

Subject: PUBLIC COMMENTS FOR SBNMS's DRAFT
MANAGEMENT PLAN
Date: Sun, 28 Sep 2008 20:16:05 -0400
From: cebse <cebse@codetel.net.do>
To: [Craig MacDonald@noaa.gov](mailto:Craig.MacDonald@noaa.gov),
Elizabeth.Stokes@noaa.gov, nath51@verizon.net
CC: 'Kim Bedall' <kim.bedall@usa.net>, 'Idelisa
Bonnelly - Fundemar' <fundemar@codetel.net.do>

Santo Domingo, República Dominicana

28 de septiembre de 2008

Dr. Craig MacDonald

Sanctuary Superintendent

Stellwagen Bank National Marine Sanctuary

Dear Dr. MacDonald,

As executive director of the Center for Conservation and Ecodevelopment of Samaná Bay and its Environs (CEBSE), an organization that works since 1993 in the protection of the Atlantic population of humpback whales and one of the many promoters of the SMMRD, I would like to offer the following comments on the Draft Management Plan for Stellwagen Bank National Marine Sanctuary.

The Stellwagen Bank National Marine Sanctuary (SBNMS) off the coast of Massachusetts, and the Santuario de Mamíferos Marinos de la República Dominicana (SMMRD?Marine Mammal Sanctuary of the Dominican Republic), two marine protected areas 1,500 miles apart, provide critical support for the same humpback whale population of around 900 whales. These endangered humpbacks whales are resident at SBNMS's feeding and nursery grounds from

April through December and migrate to the waters off the Dominican Republic, where they mate and calve during the winter months. It is therefore crucial that both countries protect "our humpback whales? on both ends of the migration.

As importantly, SBNMS serves as a critical forage base for humpback whales, especially mothers and weaning calves, and pregnant and lactating females. We believe that is imperative to implement a permanent ban on the exploitation of sand lance in the sanctuary (Ecosystem Alternation Action Plan 3.3.1).

We also encourage you to continue your pioneering acoustic and behavioral work on humpback whales. The sister sanctuary agreement between SBNMS and SMMRD was designed to enhance coordination in management, research and education efforts between the two sanctuaries. Ecosystem-based management within both sanctuaries will provide an opportunity to answer important natural history questions that will inform management objectives. Humpbacks are of national significance to both of our countries and internationally. We must both do our parts to help improve humpback whale recovery in the North Atlantic.

Thank you for the opportunity to comment.

Sincerely yours,

Patricia Lamelas

Executive Director

CEBSE, Inc.

www.samana.org.do

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: SBNMS AET comments]
Date: 09/29/2008 9:23:20 AM

Attachment N1: [SBNMS AET Comments.rtf](#)
Attachment N2: [Attached Message Part](#)

----- Original Message -----

Subject: SBNMS AET comments
Date: Sun, 28 Sep 2008 19:19:24 -0400
From: ET <evastropic@wanadoo.fr>
To: Craig.MacDonald@noaa.gov
CC: Elizabeth.Stokes@noaa.gov,
Nathalie.Ward@noaa.gov

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: Comments for SBNMS Draft Management Plan]
Date: 09/29/2008 9:22:02 AM

Attachment N1: [pastedGraphic.tif](#)
Attachment N2: [Attached Message Part](#)
Attachment N3: [carta_Dr_MacDonald.doc](#)
Attachment N4: [carta_Dr_MacDonald.doc](#)
Attachment N5: [Attached Message Part](#)

----- Original Message -----

Subject: Comments for SBNMS Draft Management Plan
Date: Sun, 28 Sep 2008 12:41:36 -0400
From: Idelisa Bonnelly <ibonnelly@gmail.com>
To: Craig MacDonald <Craig.MacDonald@noaa.gov>
CC: Elizabeth Stokes <Elizabeth.Stokes@noaa.gov>

Dear Dr. MacDonald:

I am including some comments in support of the SBNMS Draft Management Plan which will be of great help for our own marine mammals sanctuary.

We will keep working in the Sister Sanctuary Action Plan.
Best wishes,

Idelisa

Idelisa Bonnelly
ibonnelly@gmail.com

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: Stellwagen Bank National Marine Sanctuary]
Date: 09/29/2008 9:21:24 AM

Attachment N1: [09-26-2008 \(2\) .pdf](#)

----- Original Message -----

Subject: Stellwagen Bank National Marine Sanctuary
Date: Fri, 26 Sep 2008 16:19:12 -0500
From: Brenda Dewdney <bld@cep.unep.org>
Reply-To: bld@cep.unep.org
Organization: UNEP-CAR/RCU
To: Craig.MacDonald@noaa.gov
Elizabeth.Stokes@noaa.gov,
CC: Nathalie.Ward@noaa.gov, 'Alessandra Vanzella-Khoury' <avk@cep.unep.org>

Dear Dr. MacDonald,

On behalf of Alessandra Vanzella-Khoury, SPAW Programme Officer at the United Nations Environment Programme Regional Coordinating Unit for the Caribbean Environment Programme (UNEP-CAR/RCU), please find letter attached which is self-explanatory.

In appreciation of your kind attention.

Regards,

Brenda Dewdney

From: Michael Dombek <mdombek@bu.edu>
To: sbplan@noaa.gov
Subject: DRAFT MGMT PLAN COMMENT
Date: 09/29/2008 7:45:41 AM

Attachment N1: [SBNMS_DraftPlanCommentForm.doc](#)

Dear Sir or Madam,

Please disregard my previous email as I attached the incorrect document to the message. Attached you will find my comment form for the draft management plan. Please let me know if it was received successfully. Thank you.

Sincerely,

Michael Dombek
Boston University 2010

From: marissad@bu.edu
To: sbplan@noaa.gov
Subject: SBNMS Comment
Date: 09/28/2008 9:58:03 PM

Attachment N1: [SBNMS comment.doc](#)

I would just like to submit my comment.

Thank you,

Marissa Donovan

From: cachorn@bu.edu
To: sbplan@noaa.gov
Subject: SBNMS Draft Management Plan Comments
Date: 09/28/2008 1:34:42 PM

Attachment N1: [SBNMS_DraftPlanCommentForm.doc](#)

Dear Sir or Madam,

I would like thank you for the opportunity to submit my comments on the SBNMS Draft Management Plan. I think that the Plan will be a great help in preserving our Sanctuary, and I hope that my comments may help in some way.

Thank you,

-Catherine Achorn

From: Aurora Tsai <amtsai@gmail.com>
To: sbplan@noaa.gov
Subject: SBNMS draft management plan comments
Date: 09/28/2008 12:53:47 PM

Attachment N1: [TsaiProposal.pdf](#)

I have attached a letter providing my comments for the SBNMS Draft Management Plan. I hope you'll take my comments under consideration when revising the plan into its final form.

Thank you,
Aurora Tsai

From: stougas@bu.edu
To: sbplan@noaa.gov
Subject: comment on the draft management plan
Date: 09/25/2008 11:43:51 PM

Attachment N1: [SBNMS_DraftPlanCommentFormyes.doc](#)

This message is in MIME format.

From: Eric J. Takakjian <rvquest@comcast.net>
To: sbplan@noaa.gov
Subject: SBNMS Draft Management Plan Comments
Date: 09/25/2008 8:45:53 PM

Attachment N1: [SBNMS Draft Management Plan Comments.doc](#)

Dear Mr. Craig MacDonald Ph.D.,

Attached are my comments on the SBNMS draft management plan. I have focused my comments on the area of the plan which concerns the activites I am involved in within the SBNMS. My activities within the sanctuary are primarily having to do with various types of oceanographic research and diving connected with historical maritime research.

Best regards

Eric J. Takakjian
General Manager
Quest Marine Services
502 Sconticut Neck Road
Fairhaven, MA 02719
508-789-5901 Cell
508-990-3802 Office
www.questmarineservices.com
info@questmarineservices.com

From: srstark@bu.edu
To: sbplan@noaa.gov
Subject: Draft Management Plan Comment Form
Date: 09/25/2008 3:28:50 PM

Attachment N1: [Stark Comment.doc](#)

To whom it may concern:

Attached is my comment form for the Stellwagen Bank Marine Sanctuary Draft Management Plan. Thank you for the opportunity to contribute to the Plan, and thank you for taking the time to read and consider my comment!

---Sarah Stark
Boston University '10

From: allief06@bu.edu
To: sbplan@noaa.gov
Subject: Draft Management Plan Comments
Date: 09/25/2008 11:04:14 AM

Attachment N1: [SBNMS_DraftPlanCommentForm.doc](#)

Here are my comments on the Draft Management Plan.
Thank you for taking the time out to read and consider them.

Allison Finnell
Boston University.

From: Elizabeth.Stokes <Elizabeth.Stokes@noaa.gov>
To: sbplan@noaa.gov <sbplan@noaa.gov>
Subject: [Fwd: Draft Management Plan Document --comments and inquiry]
Date: 08/27/2008 2:35:41 PM

Attachment N1: [Stellwagen DMP Review Letter 2008.doc](#)

----- Original Message -----

Subject: Draft Management Plan Document --comments and inquiry
Date: Fri, 09 May 2008 15:02:31 -0400
From: Gib <Gib5@charter.net>
Nathalie Ward <nward@mbl.edu>, Kathryn Greene <yintao@earthlink.net>, Kathi Rodrigues <Kathi.Rodrigues@noaa.gov>, Susan Farady <susan.farady@verizon.net>, Judi Pederson <jpederso@mit.edu>, Regina Asmutis <regina.asmutis-silvia@wdcs.org>, Captain Martin Mccabe <mmccabe@BostonPilots.com>, Steve Tucker <apogee33@gmail.com>, Tim Moll <tmoll@byy.com>, Priscilla Brooks <pbrooks@clf.org>, Bill Adler <Bill@lobstermen.com>, Kate Nattrass <knattrass@ifaw.org>, "William (Chip) Reilly, III Reilly" <creilly@bostonharborcruises.com>, Reed Bohne <Reed.Bohne@noaa.gov>, Sally Yozell <syozell@tnc.org>, Paul Howard <phoward@nefmc.org>, Craig Macdonald <Craig.MacDonald@noaa.gov>, Rich Delaney <delaney@coastalstudies.org>, Dale Brown
To: <daleth@verizon.net>, Steve Milliken <sjmilliken@comcast.net>, Dick Wheeler <wheelerauk@comcast.net>, DAVID ROBINSON <drobinson@palinc.com>, Leslie-Ann McGee <Leslie.Ann.McGee@state.ma.us>, Robert Foster <bob@bostondeepwrecks.com>, Captain Frank Morton <fmorton@bostonpilots.com>, David Pierce <david.pierce@state.ma.us>, Heather Rockwell <heather@nantucketsoundkeeper.org>, Deborah Cramer <deborahcramer@deborahcramer.net>, Leona Roach <LSRMARINE@aol.com>, Barry Gibson <barrygibson6@aol.com>, Porter Hoagland <Phoagland@whoi.edu>, David Casoni <lobsterteacher@hotmail.com>, Mason Weinrich <mason@whalecenter.org>, Heather Knowles <heather.knowles@ariad.com>, Nat Ward <nath51@verizon.net>, Brendan O'Brien

Bjo272@aol.com, Nathalie Ward
Nathalie.Ward@noaa.gov, Chris Kellogg
ckellogg@nefmc.org, mark Wilkins
mcwilkins@comcast.net, Paul Ticco
Paul.Ticco@noaa.gov, Peter Auster
peter.auster@uconn.edu, Peter Auster home
home pjauster@aol.com, "Edward J. Marohn
Marohn" edward.j.marohn@uscg.mil, Jack Kent
Crowley t.j.crowley@comcast.net, Vito
Giacalone summer-breeze@mindspring.com,
Edward Barrett fvphoenix@earthlink.net,
Michael Sosik mfsosik@nemerchant.com,
Kathleen Dolan Kathleen.Dolan@state.ma.us
Stephanie Young Young
stephanie.young@mcbi.org, John Williamson
jwilliamson@oceanconservancy.org, "Theresa
Barbo Barbo Dir." ccbay@coastalstudies.org,
Jennifer Ferre ferre@alum.bu.edu, David
Bergeron dbergeron@fishermenspartnership.org,
David Dickson Dickson
ddickson@oceanconservancy.org, Olivia Rugo
Free orugo@fishermenspartnership.org, Dan
Morast Morast dmorast@iwc.org, Chad
Demarast cdemarest@NEFMC.ORG, Dave
Wiley David.Wiley@noaa.gov, Leila Hatch
Leila.Hatch@noaa.gov, Alan Collette
Alan.Collette@noaa.gov, "Dorine.L.Westgate"
Dorine.L.Westgate@noaa.gov, Nathalie Ward
Nathalie.Ward@noaa.gov, Just Moller Moller
Just.Moller@noaa.gov, Michaeal Thompson
Thompson Michael.A.Thompson@noaa.gov,

CC: Ruthetta Halbower

Ruthetta.Halbower@noaa.gov, Nat Ward
nath51@verizon.net, Dave Waldrip
David.Waldrip@noaa.gov, Matt Lawrence
Lawrence Matthew.Lawrence@noaa.gov, Ben
Cowrie-Haskell Ben.Haskell@noaa.gov, Dede
Marx Marx Deborah.Marx@noaa.gov, Anne
Smrcina Anne.Smrcina@noaa.gov, Bibi Stokes
Stokes Elizabeth.Stokes@noaa.gov, Craig
Macdonald Craig.MacDonald@noaa.gov,
Carole Carlson science@whalewatch.com,
Sharon Young SYoung@hsus.org, Kim Amaral
Amaral kamaral@whoi.edu, sue rocca
sue.rocca@gmail.com, Peter Borrelli
pborrelli@verizon.net, Peter Tyack Tyack
ptyack@whoi.edu, andrea bogomolni
andreab@whoi.edu, Maggie Geist
mgeist@apcc.org, Jooke Robbins
jrobbins@coastalstudies.org

References: b644ae8a09f8e162195358172201f17e@mbl.edu

>

Craig and all -- I apologize for not staying for the afternoon session of the SAC Meeting this past Tuesday as maybe your discussions would have clarified or answered my concerns. However, after hearing your morning presentation and a quick scan of the document, I had a few reservations and concerns about the direction taken with this report.

If I am way off base please let me know. I would appreciate hearing from others too.

Gib

From: Heather Knowles <hlk@northernatlanticdive.com>
To: sbplan@noaa.gov
Subject: Final comments on the DMP
Date: 08/15/2008 12:20:49 PM

Attachment N1: [dmp_mhr_ap-knowles-final_081508.pdf](#)

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
Web: <http://www.northernatlanticdive.com>

From: Auster, Peter <peter.auster@uconn.edu>
To: sbplan@noaa.gov
Subject: comments on management plan
Date: 08/04/2008 7:41:50 PM

Attachment N1: SBNMS_Scientist_letter.pdf

Please see attached academic scientist letter in regards to the draft management plan. Thank you, in advance, for your consideration.

Sincerely,
Peter

Peter J. Auster, Ph.D.
Science Director, National Undersea Research Center
and
Research Associate Professor, Department of Marine Sciences
Univ. of Connecticut at Avery Point
1080 Shennecossett Rd.
Groton, CT 06340-6048 USA
Phone: 860-405-9121
Fax: 860-445-2969
e-mail: peter.auster@uconn.edu
Auster Lab Homepage: <http://www.nurc.uconn.edu/BigMouthFishes/homepage>
OceanAGE: <http://oceanexplorer.noaa.gov/edu/oceanage/05auster/welcome.html>
NURC Homepage: <http://www.nurc.uconn.edu>
Dept of Marine Sciences Homepage: <http://www.marinesciences.uconn.edu>

From: Tom Pierce <jtompierce@comcast.net>
To: sbplan@noaa.gov
Subject: comments on the draft management plan
Date: 07/31/2008 9:29:27 PM

Attachment N1: stellwagen letter.odt

From: Anamarija Frankic <Anamarija.Frankic@umb.edu>
To: sbplan@noaa.gov
Subject: students' comments and suggestions
Date: 07/28/2008 7:51:52 PM

Attachment N1: [Students' suggestions for Stellwagen.doc](#)

Please find attached comments and suggestions provided by the UMASS Boston Students of the class 226 Intro to Oceanography (55 students), Professor A. Frankic.
If you have any questions please contact me.

With best regards

Dr. Anamarija Frankic

Assistant Professor

UMASS - EEOS

100 Morrissey Boulevard

Boston, MA 02125

Tel: 617-287-4415

Fax: 617-287-7474

email: anamarija.frankic@umb.edu

<http://alpha.es.umb.edu/faculty/af/frankic.html>

[/email.umb.edu/exchweb/bin/redir.asp?URL=http://alpha.es.umb.edu/faculty/af/frankic.html](http://email.umb.edu/exchweb/bin/redir.asp?URL=http://alpha.es.umb.edu/faculty/af/frankic.html)

"We have a beautiful mother; her green lap immense; her brown embrace internal; her blue body - everything we know." (Alice Walker)

* Please consider the environment before printing this email

From: Michael Ferro <harborbar@yahoo.com>
To: Electronically Mail Comments <sbplan@noaa.gov>
Subject: Electronically Mail Comments
Date: 07/20/2008 7:37:24 AM

Attachment N1: [Comment for SBNMS-Ewritten6-8.pdf](#)

Below you will find my comments regarding the SBNMS management plan. A PDF attachment accompanies the comments-showing the map schematics for fishing closure for SBNMS.

Thank you for accepting my comments.

Mike

Written Comment

for

Gerry E. Studds

Stellwagen Bank National Marine Sanctuary

Draft Management Plan

By

Mike Ferro

87 Searsville Road

South Dennis, MA

02660-3795

HARBORBAR@YAHOO.CO
M

Sanctuary Budget

(PLEASE SET THIS ACTION AS A ‘PRIORITY – HIGH’)

The current Sanctuary management plan budget has not taken the current economy forecast into account. Three factors to consider:

- Strength of the US dollar.
- Iraq war, and the treasury print money to pay for it.
- Petroleum prices.

Strength of the US dollar and petroleum prices are the factors that will hurt the 5-year budget the most. Therefore the bottom line of the budget should increase by 15-25%.

Sanctuary Revenue

(PLEASE SET THIS ACTION AS A ‘PRIORITY – HIGH’)

Revenues can be created on sanctuary protection intents. Charge all tanker ships and cruise lines that pass through a fee of \$ 200/ft. Assuming 1000 ft vessel, the fee would be \$200,000 is for round trip crossing of SBNMS. The fee will be paid prior to entering SBNMS.

Upon complying to the following regulations.

- Speed of 9 knots.
- Provide two (2) in water whale spotters one rear and one forward. Reporting to central recording whale spotter center.

Full compliance will gain a return of 75% of the fee. Non-compliance in any form will reduce the returnable money value. Speeding will get only 50% returned. Failure to comply with both only 5% will be returned.

All everyday smaller vessels will be fined for speed violations, the fine going directly to the ships' owner and Captain and operating business related to that vessel. That would be 3-fines for every violation. IE \$50 fine value equals \$150.

Automatic Identification System (AIS) could be modified to issue violators with a fine Automatically, thereby eliminating the cost of additional personnel.

Protection of whales

(PLEASE SET THIS ACTION AS A 'PRIORITY – HIGH')

Banning all ocean vessels from using the sanctuary is the best chance for Right Whale

recovery. Another practical way is to mandate propeller guards, and a maximum speed limit for all ships using SBNMS. Such mandates are to include all ocean crafts recreational and commercial, and of any size.

Outreach Program

(PLEASE SET THIS ACTION AS A ‘**PRIORITY – HIGH**’)

The outreach program has to be more reaching. My children ages 9 and 10, that would be 3rd & 5th grade, only know about SBNMS, because of the comments made by me regard the draft management plan (DMP). Another example of not knowing SBNMS happened at the local copy shop. The woman that made me a copy did not know where SBNMS was located. Her husband is a lobsterman, and he had not heard of the DMP and the commenting period regarding SBNMS management plan.

I suggest; SBNMS work with local libraries along the coast, and through out the state to create a SBNMS display, and suggest Sanctuary related reading for children’s reading hour to be done monthly. During the slow part of the season pick a grade where kids will be taken out on boats to see ocean life around Cape Cod. The cool thing about this is that most towns have a central dock allowing participating boats to pickup kids from their own town.

This increased effort will bring attention to the SBNMS and New England’s coastal waters. You are going have to get more support from the non-fishing general public succeed in getting MPAs instituted in SBNMS.

Expansion of SBNMS

(PLEASE SET THIS ACTION AS A ‘**PRIORITY – HIGH**’)

The future of SBNMS is **marine protected areas** (MPAs) that protect the SBNMS from any kind of recreational or commercial exploitation. In other words, ‘NO-TAKE MARINE ZONE’. In order to get any MPAs in place you will have to expand SBNMS boundaries. The proposal of adding Jeffery’s Ledge for boundary extension is a good start but not enough.

I suggest; Taking all of “Gulf of Maine” (GoM) Rolling Closure Areas - 3” (*map e. page 359 of SBNMS DM *.pdf version*) will be both a ‘bargaining’ area for future MPAs

negotiations, and cover a ocean floor area that has great diversity and somewhat under protection now. Move the present easterly boundary of the sanctuary out to the 200-mile limit. Take part of Cape Cod Bay to the 30ft contour, if possible. (I'm not sure how the state and federal boundary work in this area.)

Such action will allow future implementation of 'NO-TAKE MARINE ZONE'. Also, extending the burden of the SBNMS to include portions of the NH and ME coast.

'NO-TAKE MARINE ZONE'

(PLEASE SET THIS ACTION AS A 'PRIORITY – HIGH')

I suggest the marine protected areas (MPAs) be changed to 'NO-TAKE MARINE ZONE'. Definitions of MPAs have too many ambiguous meanings. While 'NO-TAKE MARINE ZONE' definition is clear, and without misinterpretation. The area of Stellwagen has been fished for 400+ years. It is amazing that fish are still being landed. The whole of "the sanctuary" is only 1% of U.S. owned GoM, and 0.001% of the eastern seaboard. That should give you an idea how little of our oceans are protected by National Marine Sanctuaries program.

Designating a 'NO-TAKE MARINE ZONE' for SBNMS that would be only 1% of GoM. Four hundred years of fishing with limited conservation actions it is amazing fish is still profitable. 'NO-TAKE MARINE ZONE' would allow the sea biodiversity to rebound to a natural state, a natural state that has not been seen in 400-years. Therefore any additional study regarding the precise placement of a 'NO-TAKE MARINE ZONE' would be pointless. A 'NO-TAKE MARINE ZONE' purpose is for total marine protection. The science has been around science 1989, simple in both design and logic. It is the right thing to do. I am suggesting-**Add rhetoric for implementation of 'NO-TAKE MARINE ZONE' for half of the sanctuary for 2009 and all of th sanctuary by 2011. Complete protection for forever with no human activity.**

The next three pages are maps giving different configuration options for placement of 'NO-TAKE MARINE ZONE'.

From: Susan Farady <susan.farady@verizon.net>
To: sbplan@noaa.gov
Subject: Ocean Conservancy comments on SBNMS DMP
Date: 07/17/2008 3:53:26 PM

Attachment N1: [OCcommentsltrhead_july08.doc](#)

Hi Craig

Please find attached our comments. Thank you.

Regards,

Susan

From: kaminc <kaminc@comcast.net>
To: sbplan@noaa.gov
Subject: SBNMS Comments
Date: 06/16/2008 5:12:07 PM

Attachment N1: [SBNMS Comments.doc](#)

Please find attached the comments of Frank Mirarchi, 67 Creelman Drive, Scituate, MA 02066. I will also submit a hard copy to the Sanctuary office in Scituate, Mass. Thank you. Sincerely, Frank Mirarchi