



**UNITED STATES DEPARTMENT OF  
COMMERCE**

**National Oceanic and Atmospheric  
Administration**

Office of National Marine Sanctuaries  
Stellwagen Bank National Marine Sanctuary  
175 Edward Foster Rd Scituate, Massachusetts  
02066

August 28, 2023

Dr. Cate O'Keefe  
Executive Director, NEFMC  
50 Water Street, Mill 2  
Newburyport, MA 01950

Dear Director O'Keefe,

I request that the Council include all of Stellwagen Bank National Marine Sanctuary (SBNMS) in any proposed management measures when revisiting alternatives to conserve Atlantic herring under Amendment 8 to the Atlantic Herring Fishery Management Plan.

SBNMS was established as a national marine sanctuary due to its ecological significance and economic importance. Herring and other forage fishes, found throughout the sanctuary, support numerous fish, mammal, and seabird predators, a highly valuable whale watching industry, and lucrative commercial and recreational fisheries. Whale watching in SBNMS generates over \$182 million in annual economic activity and supports 1,400 jobs based on survey data collected in 2018-19<sup>1</sup>. By comparison, a study conducted around the same time frame found that commercial and recreational fishing that occurs in SBNMS produces \$78 million in annual economic activity and supports upwards of 790 jobs<sup>2</sup>. Given this significant amount of biological and economic activity, it makes sense to preserve the forage base within the boundaries of SBNMS to ensure this blue economy activity is sustainable over the long term.

I hope that the Council acknowledges the economic and ecological significance of SBNMS by adopting management measures for herring that recognize the entire sanctuary as a

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<sup>1</sup> Schwarzmann, D., Shea, R. 2020. Whale Watching in Stellwagen Bank National Marine Sanctuary: Understanding Passengers and their Economic Contributions. National Marine Sanctuaries Conservation Series ONMS-20-12. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries, Silver Spring, MD. 60 pp.

<sup>2</sup> Schwarzmann, D., Shea, R. Leeworthy, V.R., Steinbeck, S., Dato, C. 2020. Technical Methods of Estimating Commercial and Recreational Fishing Effort and Economic Contributions in Stellwagen Bank National Marine Sanctuary. Marine Sanctuaries Conservation Series ONMS-20-05. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries, Silver Spring, MD. 195 pp.

single ecological unit, supporting the goals in our newly published management plan<sup>3</sup> of comprehensive sanctuary management and conserving the forage base. In addition, including the entire boundary of SBNMS within any spatially and temporally explicit gear restrictions such as the previously considered midwater trawl exclusion area would address several concerns with the previous version of the closure. It would protect critical herring habitat beyond 12 nautical miles from shore within SBNMS. It would also reduce entanglement risk to marine mammals and sea turtles from midwater trawl gear, particularly in shallow portions of SBNMS where midwater trawl nets could span the entire water column. Finally, a midwater trawl exclusion area that encompasses all of SBNMS would avoid the unintentional concentration of midwater trawl activity along any exclusion area boundary that cuts across Stellwagen Bank proper, potentially resulting in unnecessary and unacceptable interactions between the midwater trawl fleet and sanctuary resources.

Thank you for the opportunity to provide input on this important conservation matter.

Sincerely,

Captain Peter DeCola  
U.S. Coast Guard (retired)  
Superintendent,  
Stellwagen Bank National Marine Sanctuary

cc: Mr. Eric Reid, Chair NEFMC  
Mrs. Cheri Patterson, Chief, Marine Fisheries, NHFGD  
Mr. Rick Bellavance, Vice Chair, NEMFC  
Mr. Michael Petony, Regional Administrator, GARFO  
Dr. Jon Hare, Science and Research Director, NEFSC  
Matt Brookhart, Eastern Regional Director, Office of National Marine Sanctuaries

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<sup>3</sup> National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries. 2023. Stellwagen Bank National Marine Sanctuary Final Management Plan and Environmental Assessment. Silver Spring, MD.