



**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

June 9, 2023

Mr. Tom Nies
Executive Director, NEFMC
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Tom,

As a follow up to my previous letter dated April 6, 2023, I am writing to request that the NEFMC include all of Stellwagen Bank National Marine Sanctuary (SBNMS) in any Inshore Midwater Trawl Restricted Area or other management measure that may be re-established under Amendment 8 to the Atlantic Herring Fishery Management Plan to conserve Atlantic herring.

The high productivity of SBNMS, including its abundance of herring and other forage fishes is part of what makes it a critical foraging ground for fishes, mammals, and seabirds. This productivity supports numerous activities that occur in SBNMS which make valuable contributions to the local economies of coastal communities in Massachusetts, New Hampshire and Maine. Herring and often associated mackerel are caught throughout almost all of SBNMS, particularly on Stellwagen Bank proper. Therefore, including all of SBNMS within any new buffer zone or management measure helps ensure adequate prey for the numerous commercial species that use SBNMS as Essential Fish Habitat.

We also note the potential entanglement risk midwater trawl gear poses to marine mammals that concentrate on Stellwagen Bank. Midwater trawl nets may span the entire water column in some areas of Stellwagen Bank, potentially preventing dolphins, seals, porpoise, or even whales from moving out of the way. We request that the Herring Committee task the PDT with analyzing the range of sizes and extents of midwater trawl nets (both single and pair) in relation to the depth of SBNMS and Stellwagen Bank in particular to better understand entanglement risk.

SBNMS was designated as a national marine sanctuary due to its ecological significance and economic importance and having abundant herring within the sanctuary is a critical component to both. We urge the NEFMC to consider the ecological and economic benefits of prohibiting midwater trawling throughout the entire SBNMS.

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