



**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

January 9, 2024

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

Re: Amendment 10 Scoping - Atlantic Herring FMP

Dear Director O'Keefe:

NOAA's Stellwagen Bank National Marine Sanctuary (SBNMS) requests that the Herring Committee consider the items below when developing the scoping document and public hearings for Amendment 10 to the Atlantic Herring Fishery Management Plan.

*Scoping Document*

During the January 5 Herring PDT meeting, a revision to the draft scoping document was suggested that the scoping document invite the public and interested stakeholders to comment on what management measures should be considered to address user group conflicts in the Atlantic Herring Fishery. We support and agree with this revision to the scoping document.

*Public Hearings*

Herring are a key forage fish on Stellwagen Bank for many whale, seabird, and fish species. There are several related user groups that herring supports directly or indirectly, including whale watch companies, eco-tourism groups, and recreational fishermen and boaters. Some of these user groups may not typically engage in Council actions or be aware of the scoping process. SBNMS encourages the Council to solicit input from these stakeholders to ensure that their perspective is considered during the scoping for Amendment 10. Please let us know if you need contact information for any of these constituents.

Additionally, we would like to share with the Council that SBNMS recently concluded a Climate Vulnerability Assessment (CVA) expert workshop, which assessed the sensitivity and vulnerability of resources on Stellwagen Bank, including herring, to climate change and other



anthropogenic stressors. The CVA may be useful to inform decisions related to Amendment 10 and other management measures impacting forage fishes on Stellwagen Bank. We look forward to sharing our completed report with the Council upon publication later this year.

Thank you for considering these comments.

Sincerely,

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