

Honorable John E. Bryson, Secretary  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230



Re: Integration of National Marine Sanctuary and fishery management in New England.



Dear Mr. Bryson:

The undersigned organizations wish to convey their strong support for a proposal produced by Stellwagen Bank National Marine Sanctuary (SBNMS) which would, if implemented, provide a valuable new tool for management of both fisheries and Sanctuary resources in New England. This Sanctuary Ecological Research Area (SERA) proposal has been well-considered within NOAA, and has been developed to address NOAA's science goals in regards to ecosystem-based management. The proposal was released by SBNMS as a draft to the general public on September 14, 2011 and was to be conveyed by NOAA to the New England Fisheries Management Council (NEFMC) for their consideration and potential integration into their Omnibus Habitat Plan Amendment 2. NOAA withdrew from this intended procedure hours before its release, leaving the proposal "on the street" as a draft document but with no destination for consideration by any NOAA management process. We request that the Department of Commerce address whatever policy or decision that has delayed forwarding the SERA proposal to the NEFMC for the draft EIS now under development. Forwarding the proposal simply begins a new round of public discussion and review that occurs at multiple levels within the Council process.



The SERA proposal would designate areas within SBNMS as marine habitat reference sites essential to the design of research and monitoring programs within the Sanctuary and elsewhere in New England waters. The SERA proposal is the result of a long development process with ample public and expert input already, in response to priorities identified during SBNMS Management Plan Review by a multi-stakeholder Sanctuary Advisory Council. In September, the Sanctuary Advisory Council approved the proposal for NOAA to convey to the NEFMC for the next stage of development.

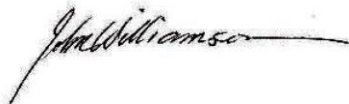
For the Sanctuary this SERA tool is long overdue. But the most urgent imperative compelling this proposal to be brought forward now stems from its strong link to regional fishery management. Fishing is well-documented as the primary source of impact to living marine resources within the Sanctuary. The SERA, as an "experimental control", would be closed to various kinds of fishing as part of its design; procedure requires coordination with regional fishery management. Currently the New England Fishery Management Council is making a complete review of its spatially-explicit management strategies, likely resulting in a comprehensive system of areas managed for optimum benefit to both conservation and fisheries. The SERA

could be an important component of this system, providing the basis for tracking the ecological integrity of marine communities within the Sanctuary, consistent with the National Marine Sanctuaries Act, while also providing fishery managers information for conservation of essential fish habitat, consistent with the Magnuson-Stevens Fishery Conservation and Management Act. But this will not happen without coordination by NOAA.

By integrating the SERA into fishery management plans through the New England Fishery Management Council planning process, there need not be any loss to the fishing community through its implementation, and there could be economic gains realized in the short-term by allowing managers to more tightly focus other fishery management actions currently under development for optimal economic results. The SERA can fulfill an important science function, enhancing the ability to predict the threshold at which human uses might compromise the marine ecology which supports fisheries' vitality; the long-term benefit will be the creation of more high-quality jobs for commercial fishermen and more high-quality fishing opportunities for recreational fishermen through informed stewardship.

The SERA proposal is a critical link in the discussion about balancing multiple human needs in regards to ocean management. That NOAA has indefinitely postponed this discussion seems inconsistent with the stewardship role the agency plays, one which our organizations have come to expect. The public process must be allowed to proceed to its conclusion. The SERA should be evaluated on its scientific merits and incorporated in the context of fishery management for optimum benefit to society.

Sincerely,



John Williamson, President  
Stellwagen Alive! Friends of Our National Marine Sanctuary



Robert Moir, Executive Director  
Ocean River Institute



Jack Clarke  
Director of Public Policy & Government Relations  
Massachusetts Audubon



Dave Raney, Chair  
Sierra Club Marine Action Team

cc: Dr. Jane Lubchenco, NOAA Administrator  
Senator John Kerry  
Senator Scott Brown  
Congressman Barney Frank  
Congressman Edward Markey  
Congressman John Tierney  
Congressman Michael Capuano  
Congressman William Keating  
Daniel Basta, Director, ONMS  
Dr. Craig MacDonald, Superintendent, SBNMS