

June 11, 2008

## **Stellwagen Bank Marine Sanctuary Statement**

My name is Susan Playfair. I am the author of *Vanishing Species*, and a Board Member of Friends of South Shore Fisheries.

Friends of South Shore Fisheries applauds the Sanctuary Staff for its work in researching and compiling the Stellwagen Bank Draft Management Plan and its accompanying Review. However we have a few comments and suggestions.

The stated Sanctuary Mission is "to conserve, protect and enhance the biological diversity, ecological integrity and cultural legacy of the sanctuary while facilitating compatible uses." Commercial fishing should be viewed as the principle compatible use. As the review points out, "fishermen make the sanctuary waters safer." To deny the importance of their contributions is to deny that commercial fishermen provide one of the healthiest food sources available on the planet. Contrary to the mission, page 7 of the Plan Review is highly inflammatory in its tone, its outdated data, and its omissions. We would like to see it rewritten in order to give a more balanced view of the benefits and interdependent nature of commercial fishing and the stated mission of Stellwagen Bank.

The National Marine Sanctuaries Act requires that marine sanctuaries be required "to facilitate to the extent compatible with the primary objective of resource protection, all public and private uses of the resources of these marine areas not prohibited pursuant to other authorities." At present, a 1200 NM area closed to fishing abuts and overlaps the Sanctuary. Commercial groundfishing and use of bottom-tending mobil gear is prohibited in this area. In addition, areas where groundfishing is prohibited through seasonal closures for up to four months each year overlap the

entire sanctuary. These restrictions to commercial fishing are not adequately mentioned until page 81 of the Draft Management Plan. We hope this oversight can be corrected in the final plan.

The National Marine Sanctuaries Act also requires the Plan "to create models of, and incentives for, ways to conserve and manage these areas, including the application of innovative management techniques." The Draft Management Plan for Stellwagen Bank cites scientific studies indicating the importance of conserving fish species by preserving older and larger spawning females. We would like to suggest an "innovative management technique" geared to accomplishing this goal while allowing a healthy commercial fishing community. Commercial Fishing must be seen as an integral means to conservation of a healthy resource within a marine sanctuary. We suggest that zones within the sanctuary be set aside for the growth of large, female members of the various species of groundfish. All human activity would be prohibited within these breeding grounds. Commercial fishing would take place at the edges of the breeding grounds.

Commercial fishing cannot have additional restrictions placed on it. And regulatory bycatch must not be encouraged by any final sanctuary plan. Thus, I propose that commercial fishermen fishing on the perimeter of breeding grounds established by any sanctuary plan not be ruled by species management.

Yield has increased in the other marine sanctuaries where this plan has been tried. We encourage NOAA, the National Marine Fisheries Service, and others in charge of the Gerry E. Studds Stellwagen Bank National Marine Sanctuary to adopt a similar plan.

Thank you for your consideration.

Susan R. Playfair

Friends of South Shore Fisheries