



CREATION JUSTICE MINISTRIES

Justice for God's planet and God's people.

Subject: Stellwagen Bank National Marine Sanctuary Public Comment

Creation Justice Ministries

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Creation Justice Ministries represents the creation care and environmental justice policies of 38 major Christian denominations and communions throughout the United States to protect and restore God's Creation.

Creation Justice Ministries educates, equips and mobilizes Christian communions/denominations, congregations and individuals to protect, restore, and rightly share God's creation.

Based on the priorities of its members, with a particular concern for the vulnerable and marginalized, we provide collaborative opportunities to build ecumenical community, guide people of faith and faith communities towards eco-justice transformations, and raise a collective witness in the public arena echoing Christ's call for just relationships among all of creation.

As Christians, we care deeply not only for God's creation and take seriously our responsibility to live in right relationship with God's people and planet. The creation of marine sanctuaries can be a vital tool in our care for God's creation. Unfortunately, that care is null and void if the management plans are not updated to reflect the challenges facing God's Marine Creation.

In the past 10 years, NOAA has tracked measurable degradation of habitat quality in the sanctuary. This degradation is tracked to human activities and commercial fishing, both of which are only allowed minimally in highly and fully protected areas. These effects are being seen in the endangerment of Humpback whales and the warming of Stellwagen's waters, which are warming faster than 99% of the global ocean, exacerbating the effects of other stressors on

sanctuary resources. Outdated management practices for this sanctuary are putting a great wealth of biological diversity at risk, such as more than 575 species residing within, including seabirds, sea turtles, 22 species of marine mammals, and fish.

The central purpose and policy of the National Marine Sanctuaries Act is “to maintain the natural biological communities in the national marine sanctuaries, and to protect and, where appropriate, restore and enhance natural habitats, populations, and ecological processes. NMSA Section 301(b)(3). By not updating the management plans for the sanctuary NOAA is forgoing its legal responsibility under the National Marine Sanctuaries Act..

It’s time to update the management plan for this beautiful, important piece of God’s creation. We ask that NOAA revises the management plans to place the strongest possible protections in place for the sanctuary. Given the degraded state of the habitat and wildlife in the sanctuary, the draft management plan ought to propose major changes to the current regulatory regime as well as include input from affected communities. We ask NOAA and the Secretary of Commerce to fulfill the purpose and policies of NMSA and revise the management plan to protect and restore the sanctuary’s wildlife and habitats. This is a question of science, law, and most importantly, morality. NOAA is scientifically, legally, and morally responsible for the health and flourishing of Stellwagen Bank Sanctuary. Use your authority to update the management plan and provide the strongest possible protections for this one-of-a-kind piece of God’s creation.

Specifically, we urge the sanctuary management plan to:

1. Amend the Soundscape Action Plan to commit the Sanctuary to conduct sector-specific noise management planning, in partnership with private sector stakeholders, and require, within 12 months, noise mitigation measures to be implemented by the Sanctuary.
2. Require vessels operating within or transiting through the sanctuary to travel at speeds of 10 knots or less, to reduce the incidence and severity of vessel strikes with humpback whales and other large whale species.
3. Formally request the New England Fishery Management Council to do the following:
 - a. Prohibit all directed fishing for Atlantic cod within the Sanctuary. Any recreational fishing allowed would need to be catch and release of Atlantic cod and utilize best practices to minimize mortality.
 - b. Expand seasonal spawning protections for cod in the area in and surrounding the NW corner of Stellwagen Bank.
 - c. Provide protections to the southern portion of the sanctuary because of the importance of the area for sand lance, a critical prey species, and for humpback whales which feed on the sand lance.
 - d. Provide additional protection for sand lance, a species that is currently unmanaged by the New England Fishery Management Council through either: (1) a fishery management plan specifically developed to conserve and manage sand lance and other unmanaged species in the region; or (2) through an amendment to the Northeast Multispecies fishery management groundfish plan to add sand lance as an ecosystem component species and prohibits the development of a fishery for sand lance;

4. If the Council refuses to take actions such as the above, NOAA should revise the sanctuary designation document to empower the sanctuary to regulate fishing to enable the sanctuary to effectively protect valuable resources.

We encourage NOAA to revisit the management plan for Stellwagen Bank National Marine Sanctuary and include input from communities most-affected.

NOAA has the scientific, legal, and moral responsibility to amend the management plan to protect this important part of God's creation. The dozens of national denominational bodies, thousands of churches, and hundreds of thousands of Christians in the Creation Justice Network pray for you and urge you to do all you can to protect this amazing sanctuary.

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