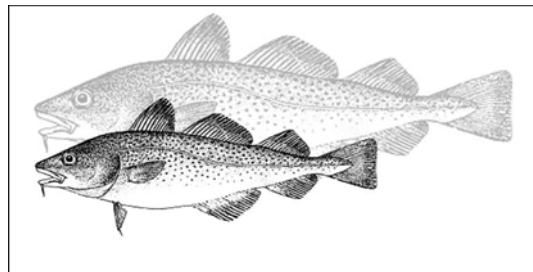


**Comments by the Gloucester Fishermen's Wives Association
on the Stellwagen Bank National Marine Sanctuary
and the Draft Management Plan
October 3, 2008**

In the view of the Gloucester Fishermen's Wives Association, the Draft Management Plan does not adequately represent the range of issues pertaining to fishing pressure on the Stellwagen Bank National Marine Sanctuary. To prove this point, a few specific examples have been extracted from the Draft Plan:

1. How can it be proven that “on an annual basis, virtually every square kilometer of the sanctuary is physically disturbed by fishing?” Does that include the Western Gulf of Maine Closure and the areas which are simply too rugged for fishing nets? Is it really true that commercial fishing impacts and pressures every resource state in the sanctuary? How many sand lance are harvested by commercial fishing and how does that compare with the numbers that are eaten by whales? Why wasn't VMS data used to track commercial fishing activity?
2. Why are the landings from 1996 being used in the average? Doesn't it matter more how many fish have been landed since Amendment 13 was imposed? What was the estimated level of discards in 2006? Is the amount increasing or decreasing?
3. “Of the total New England landings, the part of the catch from the sanctuary amounts to 1.9% to 2.8%.” This represents 40 million dollars of value when you consider that the New England fishery is said to be valued at 2 billion dollars. Also, VTR's are not reliable as an indicator of where fish were actually caught.
4. “From 1963 to 2000, the maximum length of cod in the sanctuary decreased by 27%.” We object to this unfair depiction of cod maximum length which is biased and misleading. Elsewhere in the report it states, “Since the onset of fishery management actions in the 1990s, the maximum length of some species, particularly cod and haddock, appears to be increasing.” So which is it? Are cod lengths increasing or decreasing in recent years? Shouldn't this figure be redrawn to reflect current trends?



5. “Fishing gear fouls 11 of 18 known historic shipwreck sites in the sanctuary, which also display evidence of damage by gear impacts.” Has any effort been made to distinguish between historic damage and recent impacts since regulations took effect?

6. “The sanctuary seems prone to biological invasion by exotic species, based on factors associated with chronic habitat disturbance by fishing and proximity to extensive commercial shipping traffic.” What is the evidence that fishing spreads invasive species? Aren’t there other more plausible explanations?

Other statements in the plan seem to imply a necessary pathway to fisheries closures, without any regard to the negative consequences. For example, Draft Management Plan cites:

1. “Effects of Disturbance, the disturbance of the seabed by bottom mobile fishing gear (otter trawls and dredges) is sometimes viewed as synonymous with forest clearcutting...”
2. “The exemption for traditional fishing activities reduces the effectiveness of these [sanctuary] regulations in managing habitat disturbance, and thereby protecting ecological integrity and managing for biodiversity conservation.”
3. “The BOFF [big old fat females] effect should be incorporated into management models for fishing in the Stellwagen Bank area; most likely they should apply to the GoM as a whole for the sanctuary to appreciate major benefits.”

The following sweeping statements appear to be taking us down a new road towards uncharted territory in fisheries management. They imply that conventional fisheries management is obsolete and we need to manage based on biological diversity. Where has this new management strategy been tested? Do we manage farms or game preserves for maximum biological diversity.

EFFECTS OF FISHING:

1. “the sanctuary cannot effectively conserve its biodiversity by managing just for population level effects of fishing on commercially important species, and that the ultimate goal of sanctuary management must be the protection and restoration of its biological communities.”
2. “the key to protecting and restoring biological communities within the sanctuary must be modification of fishing activities to make them environmentally sustainable such that habitats are not damaged and excessive biomass as bycatch is not removed. If the sanctuary is to be effectively managed for biodiversity conservation, fishing in the sanctuary cannot continue to be prosecuted solely in terms of the more conventional sense of sustainable production. Rather, the calculation of optimum yield within the sanctuary should explicitly include the protection of biological diversity pursuant to the objectives of the National Marine Sanctuaries Act.”

The landings alone from Stellwagen Bank are worth \$30-40 million annually. When a conservative multiplier of 3 to 4 times sales benefits is applied, the local direct plus indirect economic benefit could reach \$140 million per year.

It is far more difficult to value the cultural legacy that protects an entire way of life. The cultural assets like our working waterfronts and our fishing grounds, are invaluable, and the Stellwagen Sanctuary has inherited a responsibility to protect these irreplaceable cultural resources.

The waters of Massachusetts support a diverse and complex fishery shaped as much by the contours of the coastline as by the abundance and location of fish stocks. While the deep-water ports of Gloucester and New Bedford remain legendary for their distant water fleets, fisheries have evolved with the constraints of fishing geography and current fisheries management. Stellwagen Bank is now the favored fishing ground for most of the forty to sixty foot, one to two man crew, New England federal groundfish boats. Stellwagen Bank National Marine Sanctuary constitutes the vast majority of federal waters these fishing vessels can safely access. Furthermore, the harbors that indent the coastline of Massachusetts Bay from Cape Ann to Cape Cod support, and are supported by, these local independent fishermen.

However, today most of these harbors are crowded by residential and recreational activity. Yet, in an ironic twist, commercial fishing, which was once the dominant activity, has become an icon of the community's cultural heritage. Fishing trades are the living cultural assets of the waters that produce their catch. In the Stellwagen Bank National Marine Sanctuary, the renewable resources fishermen help to maintain, provides the citizens of the United States with a daily catch of high quality healthy food. Commercial fishermen are the stakeholders on behalf of the American consumer.

Areas of productive fishing grounds are being recognized as conduits of food and commerce as well as reminders of historical community character. Our heritage, traditional -cultural practices, fishing communities, and the public depend on access to the Stellwagen Bank National Marine Sanctuary. It was the realization of the high value of Stellwagen Bank as fishing ground, which initially led local communities to seek protection of it under the Sanctuary program. It is the family jewel of the New England fishing communities entrusted to the National Marine Sanctuaries Program.

The tenacity of fishermen is legendary. Facing a blown engine, a ripped net or a November gale, they will cope; there is always hope of another fair day with a bountiful catch ahead to balance the books. However, the creeping economic strangulation they now face is unprecedented. Tomorrow may now mean a three month closure. Most of a bountiful catch must now be discarded, dead, into the sea. The once-free ocean is now hemmed by boundaries: state waters, federal waters, permanent closed areas, seasonal closed areas, and marine sanctuaries. Each carries its own set of rules. The synergistic effect of these multiple jurisdictions has added enormous complexity to the decision of where and when to fish.

Once, at a time when the decision was unfettered by regulatory complexity, the logical choice was to go where the catch rate was expected to be highest, consistent with safety and vessel capability. Often that decision led to waters now encompassed by the SBNMS where the day boat operators, typical of the smaller Massachusetts ports could expect to fish safely and return home with a profitable catch.

Today, the Sanctuary's managers and some of its advocates are challenging access to these historic grounds. Initially, the value of this area was a key motivator in the Sanctuary's initial designation. But now, in a perverse turn, fishing is identified as a potentially incompatible activity.

Advocates of a ban on fishing dismiss the Sanctuary's contribution to regional fishery economics. This argument fails to recognize the importance of these waters to day boat operators and the communities that support them. A prohibition on fishing within the Sanctuary would be a death knell for scores of these vessels. It would impoverish working families and leave voids in the remaining working waterfronts of coastal communities.

Yet to simply argue for no change is an inadequate and incomplete response. The underlying malefactor is an ineffective and failing fishery management plan. This must be addressed and remedied not only for the benefit of the Sanctuary but also for fisheries and fish habitats throughout the region. Development of catch-based management programs, such as harvest cooperatives, will eliminate regulatory discard and go a long way towards this end. Advocates for both fisheries and the Sanctuary should find common ground and begin working together toward that objective.

One way to accomplish this is through a dedicated effort to conduct more collaborative research within the sanctuary to better define the state of the resource, baseline biodiversity, and potential threats to sustainability. The report by the US Commission on Ocean Policy to the President (2005) recommended collaborative research as a way to incorporate an ecosystem-based science into management, which is completely consistent with the goals of the Draft Management Plan. Yet, nowhere in the plan was a collaborative approach to research recommended.

Finally, we have come to a topic seldom mentioned in the Draft Management Plan: the negative consequences of fisheries closures. Specifically, what are the downsides of less fishing on Stellwagen Bank to the American consumer? To address this issue we need to know where our fish products are coming from now. It is well established that 80% of all seafood consumed in the U.S. is imported. About a fifth of what is imported comes from China. Less well known is that according to the NYT (12/15/07), less than 1% of these imports are inspected. Even if you try to avoid imports, how can you be sure that farm raised fish aren't raised with cheap fishmeal which comes from polluted Asian fish farms

If you loved China's cat food, toys, and contaminated milk products, then you should really pay attention to their imported fish products. There are now more than 4 million fish farmers in China and many of their water ways are polluted. Many crowded fish farms are maintained with illegal antibiotics and veterinary drugs. There have been hundreds of recalls in the past two years alone including one for mislabeling poisoned puffer fish as monkfish. Last year the U.S. and Europe both temporarily banned Chinese fish imports because they didn't pass one of the infrequent inspections.

So how safe are fish imports overall? As reported on the ABC News site (11/6/07), in Alabama where they do comprehensive testing of fish products more than 60% of all fish imports are rejected.

How do we know that fish from Stellwagen Bank aren't polluted as well? For one thing, the draft plan and Environmental Assessment shows that the waters on Stellwagen Bank are clean and getting cleaner. However, the real proof was obtained by the Gloucester Fishermen's Wives Association with the help of local fishermen. Their collaborative research published by E. Monosson & D. Lincoln in the June 2006 issue of the *Marine Pollution Bulletin*, "Comparison of PCBs, Organochlorine Pesticides, and Trace Metals in Cod Liver from Georges Bank and Stellwagen Bank" showed conclusively that chemical pollutants were not bioaccumulated in the organs of cod fish on Stellwagen Bank.

This work demonstrates an important example of successful research that can be accomplished through collaborative efforts of both industry and scientists. To that end, the Gloucester Fishermen's Wives Association recommends that the future scientific research agenda for Stellwagen Bank be conducted in a collaborative nature, where both commercial fishermen and marine scientists work together combining both of their expertise and knowledge to develop and execute management relevant research projects. It is further recommended that any science advisory committee that is created to oversee new data and information either have a representative of the fishing industry, a scientist who has done collaborative research with industry, or at least give priority to research gathered through collaborative partnerships.

All of these facts should be carefully considered when planning the future of the Stellwagen Bank Sanctuary. The Draft Management Plan cannot simply nudge us inexorably towards less fishing. As days at sea are shortened and regulations are tightened, it is only a matter of time on the present course until local fishing will no longer be viable.

If that happens, the working waterfronts will disappear forever and American consumers will find themselves depending on untested foreign imports to put fish on their plates. While it may be a simple matter to consider more fishing restrictions on Stellwagen Bank, a more productive approach is to ask, "Is There a Better Alternative?" Finding innovative solutions to this question will ultimately benefit local fishermen and their communities as well as Americans throughout the country.

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