



July 25, 2016

Betsy Nicholson
Northeast RPB Federal Co-lead
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930-2276

Dear Federal Co-lead Nicholson,

The Maine Coast Fishermen's Association (MCFA) represents 35 of the remaining community-based fishermen in Maine who participate in the fishery as members of the Maine Coast Community Sector. These fishermen have dependably harvested about ½ of the total groundfish value landed in Maine since the implementation of the sector system, and are actively engaged in preserving Maine's struggling fishing communities. MCFA fishermen believe in approaching fisheries management with community and conservation in mind to ensure that we are not the last generation of working small-boat fishermen in Maine. As such, we applaud the ongoing effort to gather more information about the use of coastal and marine environments with the Northeast Ocean Plan (NOP).

The section of the Northeast Ocean Plan's third chapter which addresses commercial fishing emphasizes the difficulty of predicting the impact of new marine activities on fishing in the Northeast. This is due, at least in part, to a lack of knowledge about the nature of potential interactions between fishing gear, historical fishing grounds, and proposed activities. A potential solution to this problem, the plan states, is getting the fishing industry to participate in the discussion of a proposed project involving new users such as offshore infrastructure (Ch. 3, p. 87). But as the plan acknowledges, it is often very difficult to get members of the fishing industry to participate in planning discussions.

The plan presents a circular problem: ignorance about potential negative interactions between fisheries and new users leads to "user conflicts", in industry parlance, when these negative interactions inevitably occur (Ch. 3, p. 87). When new users prevail and make fishing difficult or impossible in a certain area, this contributes further to the alienation of the fishing industry and discourages fishermen from participating in information-sharing prior to the entry of new users. If it is true, as the report implies, that better understanding between NOP and new users will help protect fisheries, then it is seemingly in the best interest of the commercial fishing industry to participate in and contribute to NOP so that further conflicts may be avoided. In order for this to occur, according to the plan's logic, barriers created by past user conflict and misinformation must be broken down so that fishermen will feel comfortable participating.

However, as we understand it at MCFA, the real obstacle to getting the fishermen's participation in the NOP process is the fact that fishermen see the entry of any new users on the ocean as a losing proposition. Any future users that will take up space in the ocean, or on the ocean floor, will by definition make their work more difficult, reduce their income or even put them out of a job. Because of this, fishermen feel that any possible outcome of NOP will negatively impact them and are unlikely to contribute to it.

However, there are several ways that fishermen might be incentivized to "come to the table" for planning discussions. As stated in the draft, one of the top planning goals of NOP is the creation of a series of maps which will spatially depict the fishery types and frequency of fishing using data gathered from Vessel

Monitoring System (VMS) onboard computers. If these maps were sufficiently high-resolution, they could be used in the planning process to minimize spatial conflict between fisheries and new users. They could also be used to identify which fishery participants would be most affected by the entry of new users (p. 90). If fishermen were made more fully aware of the potential usefulness of these maps, they might feel compelled to help make them as comprehensive as possible.

However, the maps in the current draft of the NOP are based on historical use trends, and we are concerned that an exclusive focus on historical data may prevent us from having a full understanding of the serious challenges facing our fisheries today. For this reason, we ask that recent annual or multiyear average data be included in the plan as well. In a rapidly changing ecosystem such as the Gulf of Maine, a map that reflects outdated information can be more misleading than no map at all. However, we know that historical data lets us see how much fisheries in the Northeast have shrunk over the past four decades. Taking a longer-term view helps us to set ambitious but plausible targets for stock rebuilding based on historical abundances. Knowledge of historically important spawning grounds and other sensitive areas is also extremely helpful for the ocean planning process. In summary, both recent annual data and long-term historical trends are needed to truly understand fisheries from a planning perspective.

Another potential way to engage fishermen which, as far as MCFA is aware, has not been discussed is the possibility of designating fishing-only areas in the ocean. Just as it happened on land centuries ago, more and more parcels of seafloor and ocean “real estate” are being parceled off for various uses, from oil extraction to wind power to aquaculture and conservation. We feel confident that fishermen would be more interested in discussing ocean planning if they felt that they stood to gain equal benefit from it, rather than simply avoid worst-case-scenario outcomes. We welcome any ideas you may have about other ways to empower fishermen in the ocean planning conversation.

Thank you very much for your consideration of our comments. Please feel free to contact us with any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ben Martens".

Ben Martens
Executive Director