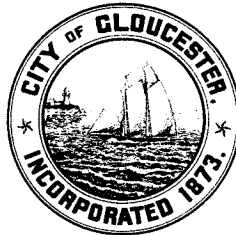


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CITY OF GLOUCESTER
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December 16, 2014

New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Comments on Omnibus Habitat Amendment

Council Members,

These past several years have been very hard on our groundfish fleet. A series of recent quota cuts and emergency actions have only exacerbated the region's federally declared economic disaster, and fishermen face a diminishing set of opportunities to make a living. As Mayor of Gloucester, I must confront the consequences of these decisions, and the economic toll they have taken on our storied waterfront, every day.

With the Council now considering habitat management areas, it is crucial to remember the responsibility under the Magnuson-Stevens Act to carry out these protections in a way that doesn't further damage the groundfish fleet, and gives fishermen the best opportunity to harvest allocations that remain available to them.

Area fishermen need to be able to catch their allocations in the most efficient way possible, a way that minimizes costs and allows them to stay financially viable. Several of the proposals before the Council today do not achieve these objectives. Instead, many of the proposals recommend taking some of the most productive fishing grounds away from the groundfish fleet, which would lead to negative environmental and economic consequences. They would displace fishing effort, forcing fishermen to fish longer in less productive areas which not only leads to higher expenses but actually offers less protection for habitat overall.

Protecting habitat and ensuring that the groundfish fleet stays viable does not have to be an either/or proposition. There are proposals before the Council that carefully balance the needs of habitat with the needs of the fishery. The industry is mindful of the potential benefits derived from sound habitat protection, and industry groups, from the Northeast Seafood Coalition representing the groundfish fleet to the Fisheries Survival Fund representing scallopers, have worked with each other and with members of the scientific community to search for a balanced solution for the region.

One of the most prominent examples of this is in the Western Gulf of Maine closure. The closure, which has been largely off-limits since 1998 due to a series of mortality and habitat regulations, has restricted access to fishing grounds where Gloucester-area groundfishermen historically caught haddock and pollock. Considering the current state of the fishery allowing fishermen to once again access parts of these areas, and catch groundfish stocks that they have traditionally fished, would provide a much-needed boost to the groundfish fleet.

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Establishing an alternative area for the Western Gulf of Maine closure other than status quo as currently recommended by the Council is strongly recommended. The industry and NOAA's Stellwagen Advisory Committee collaborated to develop Western Gulf of Maine Alternative 6, or "Stellwagen Large." This alternative provides protection for habitat areas that have been deemed important through the SASI analysis, while also allowing fishermen more flexibility than the current closure to access fish stocks in the Gulf of Maine. For these reasons, the Council should adopt this option.

For Central Gulf of Maine, the Council should also continue to support its preferred alternative for Central Gulf of Maine referred to as Alternative 4 or "Modified Cashes, Modified Jefferies Bank and Amen Rock".

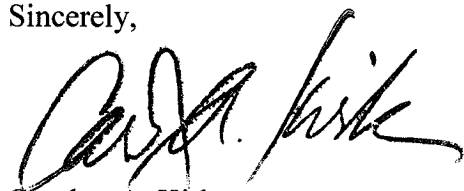
There are other alternatives, which also should be supported and ultimately selected by the Council. For Georges Bank, Alternative 7, which has received support from members of both the groundfish and scallop fisheries, provides essential habitat protection while allowing access to both key scallop grounds and groundfish areas not only along the Hague Line but also in areas where Georges Bank winter flounder is caught. Currently, with the closed area border aligned with the U.S. border, Americans are prevented from fishing along the edge of the closed area, yielding this advantage to Canadians.

For the Great South Channel, Alternative 5 strikes a similar balance. It advances and improves habitat protection while allowing the groundfish and scallop fisheries to successfully operate.

Too often the debate over habitat areas has been portrayed as a conflict between science and economics, between conservationists and fishermen. But the alternatives I've highlighted demonstrate that this isn't the case. Fishermen take their responsibility to be good stewards of the environment seriously. Faced with these challenges, these alternatives demonstrate that there can be serious and substantial habitat protections that are not economically ruinous.

As Mayor, I am frequently challenged to work in the best interests of all parties in Gloucester, and I take that responsibility seriously. As Council Members, I am sure you do the same. Fortunately, this is a circumstance that provides the opportunity to balance interests for the greatest benefit of habitat and our fisheries.

Sincerely,

A handwritten signature in black ink, appearing to read "Carolyn A. Kirk". The signature is fluid and cursive, with the first name "Carolyn" being more prominent than the last name "Kirk".

Carolyn A. Kirk
Mayor