



CITY OF NEW BEDFORD

JONATHAN F. MITCHELL, MAYOR

February 24, 2014

Chairman Ernest F. Stockwell III
New England Fishery Management Council
50 Water Street
Newburyport, Massachusetts 01950

John K. Bullard
Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930-2276

Re: Habitat Amendment – Georges Bank and Nantucket Shoals

Dear Chairman Stockwell and Administrator Bullard:

This week the New England Fishery Management Council will meet in Danvers, Massachusetts to select preferred alternatives for the Draft Omnibus Essential Fish Habitat (“EFH”) Amendment. I write to express my concern that the draft amendment contains certain alternatives that threaten New England’s fisheries with significant economic losses. The range of alternatives in the current Draft Environmental Impact Statement for habitat closures are inadequate, and invite the public to question whether the Council has fully carefully weighed the purported environmental benefits of such closures with the economic impact of those actions. I am especially troubled by the continued closures of areas along the Northern Edge of Georges Bank and the proposed closure of Nantucket Shoals.

Georges Bank

The scientific record does not support large-scale closures on Georges Bank because there is insufficient evidence that such closures would facilitate stock recovery and increase fishery productivity. In fact, the likelihood of effort displacement and increased bottom contact associated with closures in areas with relatively high densities of fish means that net damage to habitat is likely to increase if broad areas are closed. Despite this lack of scientific justification for designating large closures, the Council is considering alternatives that will have enormous economic consequences. It is estimated that thirty million pounds of scallops, valued at over \$400 million, are contained in Closed Area II along the Northern Edge of Georges Bank. The Council’s decisions during this habitat amendment process will determine whether the revenue

from this resource will be realized or locked away in the absence of a compelling environmental benefit.

It is imperative that the highest-yield areas along the Northern Edge remain open in order to maximize benefits to the resource, the industry, and our shoreside economy. The Council should not consider implementing fisheries closures for which there is no scientific justification. The Fisheries Survival Fund, Northeast Seafood Coalition, and Associated Fisheries of Maine have developed an alternate set of closed areas that provide equivalent habitat protection, as indicated by the SASI model used by the Council's scientists and technical teams, while minimizing the economic harm incurred by such closures. If closures must be designated at all, the option proposed by these organizations would be the only viable alternative.

Nantucket Shoals

Although New Bedford is known as the center of America's scallop industry, the clam industry has quickly become a significant segment of our regional economy. Clam vessels and processors now employ over five hundred people in Greater New Bedford. According to NOAA, the value-added estimate of the industry is over \$250 million annually, and the clam fishery itself is the third highest in Massachusetts. Most of the clamming vessels are home ported in New Bedford and Cape Cod and clam primarily in and around Nantucket Shoals, which is now widely recognized as arguably the richest clamming grounds in the world.

The proposed closure of Nantucket Shoals to clamming threatens all of this activity. Closing Nantucket Shoals would cause these vessel operators to choose between going out of business and fishing further offshore at a greater safety risk. As you know, the clam fishery occurs on sandy bottoms – high energy environments with little habitat to support fin fish. This is yet another issue in which reliable science must precede new fishing restrictions. Any action in the direction of reducing clamming opportunities must be preceded by thorough surveys with industry participation which show significant demonstrable benefits for finfish and the groundfish industry. I urge you not to proceed in that direction until the environmental benefits are known with a substantial degree of certainty and weighed in the fullest consideration of the resulting loss of opportunity, income and jobs for the men and women in the clam harvesting and processing industries.

Thank you for your careful consideration of these issues of tremendous importance to the City of New Bedford and its citizens.

Sincerely,


Jon Mitchell

Cc: Tom Nies, Executive Director New England Fisheries Management Council