



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: American Lobster Management Board

FROM: David Borden, Chairman Lobster Board

DATE: April 25, 2016

SUBJECT: Commission Position on Offshore Monument

The Obama Administration is currently considering, per the request of several environmental organizations, the creation of a National Monument (Monument) in the New England Canyons and Seamounts Area via the Antiquities' Act, which may or may not eventually include Cashes Ledge in the Gulf of Maine. While little information has been provided on the specific boundaries under consideration or on what fishing activities may or may not be prohibited, the action could have significant negative impacts on the lobster and crab, fisheries managed by the Commission. Chairman Grout, has arranged for the leadership of the Commission to meet with representatives of the President's Office on Environmental Quality (CEQ) on May 4, 2016 so that we have an opportunity to comment on the issue.

Of key interest to the Commission is the offshore lobster fishery which we manage in conjunction with our partners in NOAA fisheries. There are currently 132 Area 3 lobster permit holders. Each of these fishermen could be negatively affected by the designation of a Monument, either through the direct prohibition of fishing in the area, or by the displacement of effort into adjacent fishing grounds. The economic impacts of a potential Monument designation would undoubtedly be significant, as lobster and Jonah crab revenue from the SNE area alone are estimated to be \$38 million. These economic impacts would be felt coast wide as the fishing fleets working in and around the canyons hail from ports across New England and the Mid-Atlantic (Table 1).

Table 1: Federal permit holders by state. Fishing Year 2016 NOAA GARFO permit holder information.

State	# Area 3 Permit Holders	# Area 3 Trap Allocation
ME	10	4,665
NH	19	25,514
MA	47	48,701
RI	38	41,288
CT & NY	5	5257
NJ, DE, MD, & VA	13	11,443

There is also the potential for negative impacts to the lobster stock. The 2015 Benchmark Stock Assessment found Georges Bank/Gulf of Maine (GOM/GB) stock to be healthy and at record abundance. Therefore closing any portion of GOM/GB stock area to lobster fishing could displace

effort into the Southern New England (SNE) stock, which is currently depleted and experiencing recruitment failure. This redirection of effort could cause further resource depletion in SNE and hinder management actions in the area. Given the potential for large impacts on the lobster and crab fishery and the stocks, I believe it is appropriate and important for the American Lobster Management Board to collectively take a position on the Monument issue, and offer suggestions on ways to mitigate its potential impact should the Administration choose to move forward on the issue.

Notwithstanding the points above, I believe there are other important compelling considerations at risk in this decision that may affect the States. A large number of the States represented on the Commission have major interests in finfish, pelagic longline, squid, and red crab fisheries or have sizable recreational fisheries that pursue pelagic fisheries along the edge of the shelf. Although the States do not directly manage a number of these fisheries, they do have a vital interest in the decision.

All of these fisheries could be directly affected by a closure or indirectly affected by a redirection of effort. For example, a prohibition on squid fishing in proximity of offshore canyons would most certainly result in a redirection of effort to near shore New England and Mid-Atlantic waters by the offshore squid fleet. A prohibition on red crab fishing would result in a redirection into the lobster fishery since all of the red crab vessels have lobster and Jonah crab permits. The red crab fishery alone is valued in excess of \$15 million and employs over 150 individuals in New Bedford, MA. Canyon closures could force fishermen into neighboring shallower waters that are inhabited by higher densities of endangered right whale and other protected species. A Cashes Ledge closure alone would surely displace gear into other GOM areas utilized by higher densities of Right and Humpback whales. These are just a few examples of the potential impacts on the recreational and commercial community.

In recognition of the above concerns, I recommend that the Lobster Board formalize a position/guidance on this issue, and forward the recommendation to the Executive Committee, for consideration and action. Any position adopted by the Executive Committee would therefore be communicated to the office of CEQ at the May 4, 2016 meeting as a formal Commission position.