


**From:** Bowman, Randal  
**To:** [Downey Magallanes](#)  
**Subject:** suggested edits to commercial fishing impacts sec of New England memo  
**Date:** Monday, September 11, 2017 3:31:30 PM   
**Attachments:** [Suggested edits to Background D of NE memo.docx](#)

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This section, while accurate (except for one sentence) seems to me to undercut the case for the commercial fishing closure being harmful. I suggest in the attached deleting most of it for that reason.

In addition, there is one sentence that was originally included based on information available, but updated information indicated a problem; however the sentence was not removed as recommended.

D. Impacts to Fisheries of Commercial Fishing Prohibition

Commercial fisheries operate in and around the NCSMN, predominantly around the landward edges of the canyons. These areas support fisheries for a variety of species of fish and shellfish, providing income and employment throughout the Northeastern United States.

~~The most sought after species in the monument area include lobster, Jonah crab, red crab, scallops, silver hake, longfin squid, butterfish, flounders, Atlantic mackerel, and haddock. The primary gear types used in the area of the monument include bottom trawls, lobster pots, and scallop/clam dredges, with less use of separator trawls and Ruhl trawls. The New England Fishery Management Council estimated total annual fisheries revenue associated with the monument at \$1.8 million for the period 2010-2015 (based on vessel logbook data). The Council believes this may underestimate lobster revenue which, for lobster and Jonah crab, may amount to \$2.4-2.8M annually from the area of the National Monument. Many lobster vessel operators are not required to submit logbook data, accounting for the difficulty in estimation. Also according to the Council, while many vessel owners may have a low percentage of their revenue or effort attributed to the monument, others, particularly those using fixed gears, may be more dependent on the area. This is consistent with NOAA's estimate that for 2005-2014, only four vessels had annual revenue from within the monument area exceeding 25% of the vessel's total annual revenues. The majority of vessels (123) generated 5% or less of their annual landings from within the monument; 49 vessels generated between 6 and 15%; and 10 vessels generated between 16-25%.~~

The most significant impacts from the commercial fishing ban are likely to fall on the red crab fishery; and the lobster fishery, and the highly migratory species fishery. The red crab fishery is a small fishery, primarily homeported out of New Bedford, Massachusetts. The red crab fishery operates in deep sea canyons. The industry recently built its own processing plant in New Bedford, employing over 100 people annually, after years of sending crab to Canada for processing. ~~In 2009, the red crab fishery became the first Marine Stewardship Council certified sustainable fishery on the east coast of the United States.~~ Because Atlantic deep-sea red crab sex-segregate by depth, the red crab fishery is highly selective, targeting a narrow band along the shelf (between 620-650 m) in order to maximize efficiency and set traps only near the large males because retention of female crabs is prohibited.

The precise extent of the lobster fishery is not clear because only about 75% of the vessels in the monument area are required to submit vessel trip reports. Additionally, since individual lobster fishermen tend to fish the same areas to avoid each other's traps, a closure, even 7 years in the future, may disproportionately affect a few individuals who historically fish the Monument area. In theory, their lobster fishing effort could be transferred to other areas, but such transfer would result in conflicts among fishermen. Displacing any significant portion of the effort from the Monument area into Southern New England could be problematic for the health and management of that stock. It would also be difficult to re-locate effort to the northern Georges Bank or the Gulf of Maine because they are already considered saturated with gear.

Because of these characteristics of the red crab and lobster fisheries, the Obama Administration determined that the fisheries could continue for a 7-year phase out period. However, as

**Comment [ADN1]:** Need to review section to confirm.

**Comment [BRR2]:** This section is based on information provided by NOAA and the Fishery Management Council, and so can be presumed accurate. However, including all this information undercuts the case for the ban being harmful, as most of the figures here represent small %s of the total catch and revenues. I suggest keeping only the lobster/red crab section.

**Comment [BRR3]:** NOAA advised me AUG 23 that the certification was revoked and I advised Rick to delete this sentence.

discussed below, these same characteristics support the conclusion that the red crab and lobster fisheries have minimal impact on monument objects and can be effectively regulated.

The Monument area is also important to the U.S. commercial Atlantic pelagic longline fishing fleet, particularly the swordfish and tuna fisheries. Available data show that, between 2006 and 2013, the 42 vessels fishing in the Monument area reported 1001 sets occurring on 280 individual trips; that this area contains approximately 1.4% of the total U.S. Atlantic pelagic longline activity for this period, or about \$12 million average annual revenue. These vessels hail from various areas on the Atlantic coast and may fish the entire coast during different periods of the year. With pelagic species, the fishing effort can be displaced to other areas, although the cost of catching fish may go up if more travel is required. About 1293 permitted vessels fish in the monument area—though not exclusively—equaling about 40 percent of the commercial tuna rod and reel fleet.