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**To:** [atlanticconservation@noaa.gov](mailto:atlanticconservation@noaa.gov)  
**Subject:** National Monument Comments  
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**Attachments:** [national monument.docx](#)

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Dear President Obama,

As a member of the New England fishing community for 35 years, I am and have always been, committed to sustainable fishing and have dedicated decades of my life serving the management process – thousands of hours.

I would like to comment about the process and need for the “First Atlantic Ocean National Monument.

First a note about the process:

While I seem to remember a request for comment many months ago by the National Marine Fisheries Service, I heard little else until just recently when notice was given about a 2 hour town hall meeting to discuss the proposed national monument.

The process didn’t seem very democratic:

- <!--[if !supportLists]-->● <!--[endif]-->Although we were told our comments were important. Only 1 meeting has been held and it looks like there won’t be any more. A lot of voices have been left out of this discussion. This seems intentional.
- <!--[if !supportLists]-->● <!--[endif]-->At the meeting comments were limited to two minutes.
- <!--[if !supportLists]-->● <!--[endif]-->There was no documentation describing what area the monument will cover or what will be allowed in the area. We were shown a general map and given the names of the areas to be closed but no maps or detailed descriptions showing exactly where the monument will be.
- <!--[if !supportLists]-->● <!--[endif]-->I have been unable to find anything on the NMFS website giving any information about the whereabouts or regulations for the monument although the advocates for the monument seem to have a lot of information.
- <!--[if !supportLists]-->● <!--[endif]-->There has been no discussion or investigation to my knowledge regarding which of the current user stakeholders will be impacted by the creation of the monument

I, along with many others in the New England Fishing Community, have advocated for closed areas, gear modifications, gear and vessel limits and

catch shares in hopes that we would have better management, better science and a more sustainable fishery.

We are still waiting for better science. We are still waiting for the boatloads of regulations that were supposed to be replaced by catch shares to go away. There doesn't seem to be any interest for that.

We were told by supporters of the national monument that one of the reasons for its creation was to protect these areas from the threat of increased fishing pressure.

Our fleet has shrunk from over 1500 boats to less than 450 active permits. A word about permits: The morning of the town hall meeting, I spoke to a fisherman who owns 11 active permits. These 11 permits are being used to keep just 3 boats in business – boats that are barely staying alive financially because one permit per boat is no longer enough.

I believe the total number of boats actually fishing is around 250 and the average length is just over 50'. (and yet we are told that there is massive overfishing going on.)

In the 2014 fishing year which began on May, 1 2014 through April 30 2015, the New England Fishing Community left 92,096,344 pounds of fish in the water. (NMFS Northeast Web Page)

This is the shortfall of cumulative Annual Catch Limit for the region.

The Annual Catch Limit is twice buffered from the Overfishing Limit – a limit above which overfishing occurs.

The Over Fishing Limit is derived from a stock assessment. Once the Overfishing limit is determined (about 17% of the adult stock biomass) an Acceptable Biological Catch is created by reducing the Overfishing Limit by about 60% to account for uncertainty in the stock assessment.

The Acceptable Biological Catch is further reduced by another percentage – 5%- 25%, to account for management uncertainty. This number is called the Annual Catch Limit.

In the 2014 Fishing Year, the Northeast Multi Species Fleet only harvested 52,855,887 lbs out of a possible 144,952,231 pounds of ACL.

Where is the over fishing?

We have also heard trawl fishing compared to strip mining or clear cutting. This is a gross exaggeration of the truth. Nets are not made to act this way. In my personal experience in the very rare instance that a trawl net actually digs

into the soft bottom or hangs up on hard bottom, the life of the fishing crew is in immediate danger – danger of being swamped under in a following sea because the boat stops dead in the water. The only maneuver is to come about hard and go over the top of your gear in hopes of freeing it. This maneuver is also unsafe because it puts a vessel which is essentially tied down side two in the case of a following sea.

What usually happens next is the gear parts off and the crew is left retrieving portions of a destroyed net with a grapple and putting the net back together on the open ocean which can take days.

The “ancient coral gardens” described by supporters of the national monument are just that: Ancient. This means they have been around and largely undisturbed, for a long time. The areas they exist in are currently off limits to mobile bottom tending gear and the New England Fishery Management Council’s Habitat Committee is already slated to refine these closures to further protect these areas.

Sword fish and squid boats can fish these waters because their gear doesn’t come close to the bottom. I haven’t heard any discussion about what these sustainable fisheries are going to do if they are shut out of the area.

It’s also unclear if recreational fishermen will be prohibited.

During the hearing, some speakers asked to include the Cashes Ledge area in the monument. We heard that there is a kelp forest that needs to be protected from commercial fishing. It should be remembered that this area has closed to bottom tending mobile gear for 16 years – probably one reason why the kelp forest exists in such a healthy state.

The New England Fisheries Management Council has just completed the Omnibus habitat Amendment which already protects not only Cashes, but thousands of square miles of areas. The effort to end run the management process and create this zone is nothing more than an attack on sustainable fishing by some who aren’t interested in a healthy sustainable fishing fleet. Their goal seems simple: End fishing altogether. End fishing by painting the few fisherman that are left as something other than committed to a healthy resource, a healthy environment and a healthy fishery that provide healthy food to the citizens of this great country and coerce your administration to skip any substantive public discussion of the matter and just declare the areas closed.

I think you will find agreement in the fishing community that there are areas in our New England waters where certain kinds of fishing gear should never be deployed. We have closed thousands of square miles of bottom to many kinds of fishing and are in the middle of a process that is refining those areas with

real data.

These areas – especially Cashes and the Canyons aren't some distant areas – they are our front porch.

This is a plain and simple attempt by special interests to bypass the democratic process. As one who has supported your presidency twice with my votes, my donations (modest as they might be) and my time on the phone in 2008 , and remembering that you made a point of distancing your administration from special interests from the outset, the possibility of this happening now is tragic to me.

Please at least allow more voices to be heard. Your legacy is already sure and secure and doesn't need this. If sustainable fishing matters at all to you sir, please take the time to make sure we still have a fleet.

Sincerely

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CC: NOAA Atlantic Conservation, National Marine Fisheries Service