

CAPE COD COMMERCIAL
**FISHERMEN'S
ALLIANCE**

Small Boats. Big Ideas.

October 10, 2014

Ms. Libby Herland, Project Leader
Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776

Re: Monomoy Refuge Draft CCP/EIS

Dear Ms. Herland,

Thank you for the opportunity to offer comments regarding the US Fish and Wildlife Service's (FWS) proposed Monomoy National Wildlife Refuge Comprehensive Conservation Plan Environmental Impact Statement (CCP/EIS).

The Cape Cod Commercial Fishermen's Alliance is a member-based non-profit organization which works to build lasting solutions to protect our ecosystem and the future of our fisheries. The Fishermen's Alliance represents 150 fishing businesses and over 300 fishing families, making our organization the leading voice for commercial fishermen on Cape Cod. As such, we have closely tracked the development of the CCP/EIS impacting this area for years. We write today to provide input into several of the measures included in the draft CCP/EIS and to urge you to create a permanent, collaborative decision-making framework with the Commonwealth of Massachusetts and the Town of Chatham. There are - and will continue to be - many important decisions regarding the conservation of Monomoy and the responsible management of sustainable activities in these areas. These decisions should be made with all parties working respectfully together, building solutions that support the mission of the refuge and the goals of the town and the state.

At heart, Chatham is a maritime community that has relied on abundant natural marine resources for hundreds of years. We have always recognized the importance of healthy waters and coastal areas and advocated for management measures that prioritized the conservation of natural resources while allowing access for sustainable harvest. For generations Cape Cod's fishermen have relied on productive inshore fisheries to make up a portion of their fishing year and to support their businesses. With this perspective, while we recognize the draft CCP/EIS deals with a wide range of important and complicated issues, we'd like to focus our comments to highlight several issues pertaining to fishing:

- We strongly support the FWS decision to allow continued hand-harvest of scallops and clams (softshell, quahog, and razor clams) in the intertidal area. This activity has long been recognized to support the overall management goals and should continue.
- However, we oppose the FWS' proposal to prohibit wheeled carts. The use of these carts facilitates sustainable shellfishing activities allowed in these areas and prohibiting their use will have no conservation benefit whatsoever. We urge you to recognize the reality of this 'gear' and reconsider this proposal.

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- We support the FWS' proposal not to further regulate any fishing activity in open waters above submerged lands, including the use of demersal longlines, hook and line/rod and reel, hand-harvest of scallops, or lobster, crab, and whelk pots. These near-shore fisheries are of great importance to the local fishing communities and have been successfully and sustainably managed under the existing management structure for decades. We see no need to alter an approach that is clearly working well.
- Finally, we oppose FWS' proposal to prohibit any fishing method that uses bottom-tending gear, such as scallop and mussel dredging, otter trawl gear, hydraulic quahogging, or fish weirs. We recognize the need to protect seafloor habitats and that some of these gears may not be appropriate for all areas at all times, but we think an outright prohibition is the wrong approach. We ask that you consider these gears individually and recognize the significant differences among them. For example, fishermen have historically dredged for bay scallops in these waters and the Town has established gear restrictions and seasonal closures that protect vital habitat while maintaining a robust fishery. Evidence indicates that this traditional method of harvest has not had a negative impact on the refuge's nearshore waters. With this in mind, we urge you to work with management partners and the scientific community to better understand the respective impacts of each gear type and consider revisions to existing practices only where appropriate and necessary.

Beyond these specific issues, we strongly urge you to immediately begin to develop a cooperative management and decision-making framework which allows for ongoing partnership between your agency, the Commonwealth of Massachusetts and the Town of Chatham. The Town has clearly demonstrated the ability to sustainably manage its intertidal and nearshore fisheries and FWS would benefit from integrating this knowledge and experience into future management decisions. Together, these three entities can achieve the shared goal of responsible natural resource management using an inclusive decision-making process that highlights respectful discussion and collaborative solutions. We believe this "co-management" framework has the potential to result in a much more transparent and positive process, as well as better outcomes. Precedents exist for this type of collaborative approach and the successful results of those partnerships speak to the potential for improving how we manage Monomoy together. We look forward to working with you to develop this improved decision-making process and hope that it can be created, reviewed, and jointly implemented in the near-term.

Thank you for your attention to these important issues and for the opportunity to provide our comments.

Sincerely,



John Pappalardo
CEO

