



Jared Golden
Congress of the United States
2nd District of Maine

April 22, 2019

Mr. Michael Pentony
Regional Administrator
Greater Atlantic Regional Fisheries Office
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Dr. Jonathan A. Hare
Science & Research Director
Northeast Fisheries Science Center
166 Water Street
Woods Hole, MA 02543

Dear Administrator Pentony and Dr. Hare:

As the Atlantic Large Whale Take Reduction Team (TRT) gathers to recommend modifications to the Atlantic Large Whale Take Reduction Plan (ALWTRP) to reduce impacts of fixed gear fisheries on North Atlantic right whale, I write to convey my grave concern about the potential impact these proposals will have on Maine's lobster fishery.

Maine's lobster industry is an economic engine for our state, supporting the livelihoods of 4,500 lobstermen and the thousands of Mainers employed through lobster dealers and seafood processors, vessel and trap manufacturers, restaurants, and other coastal businesses. Last year, Maine led the nation in lobster landings with 119 million pounds valued at \$484 million. All told, our lobster industry generates approximately \$1.4 billion annually.

Given the importance of the lobster fishery to Maine's economy, I am deeply troubled by the manner in which the TRT intends to carry out its goal of reducing right whale mortalities by sixty to eighty percent and the impact its actions may have on the future viability of our lobster fleet. My concern is compounded by the assumptions and data that are being used in the "Risk Assessment Tool," which NOAA Fisheries intends to use to determine the health of the right whale population moving forward. It has come to my attention that this management tool has not been peer reviewed and relies on data based on averages of whale locations from 1990 to 2018. As a result, I have heard from potentially impacted stakeholders that the model could produce an output that does not account for the present-day distributional shift of these whales. Moreover, the portal for the "Risk Assessment Tool" was not available for viewing and engagement by the public until just last week. Consequently, I find it difficult to understand how a comprehensive strategy to protect an endangered species can be developed and agreed upon when the

management tool relies on outdated inputs and was only made available days before the TRT meeting.

As you know, over the past two years twelve of the twenty confirmed stranded whales were found in Canadian waters. Despite this fact, it appears that your agencies have failed to incorporate Canada's role in right whale deaths when formulating the TRT target. This omission is particularly worrisome as right whales continue to migrate through areas that overlap with Canadian lobster and snow crab fisheries that are not subject to the same whale protection measures. Ignoring the role of Canadian fisheries in future right whale management plans overlooks the reality that the species is not bound by national borders. Any management plan considered by the TRT cannot be successful unless the impacts from Canadian fisheries on right whale injury and mortality are considered and accounted for.

While I share your commitment to protecting the critically endangered North Atlantic right whale, I believe we must pursue conservation efforts that do not threaten to put thousands of hard-working Mainers out of business. For this reason, I encourage NOAA Fisheries and the TRT to postpone its rulemaking so that it can develop an improved risk assessment tool that has the support of impacted stakeholders.

I will be monitoring this situation closely and look forward to working with you and Maine's lobster industry on real solutions that both protect right whales while ensuring our state can continue to harvest lobster in the future.

Sincerely,



JARED GOLDEN
Member of Congress