

1991 - 2021

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YEARS

CAPE COD COMMERCIAL  
**FISHERMEN'S  
ALLIANCE**

**Small Boats. Big Ideas.**

The Honorable Deb Haaland  
Secretary of the Interior  
United States Department of the Interior  
1849 C Street NW  
Washington, DC 20240

Dear Secretary Haaland:

“Together, we must listen to science and meet the moment.”

The final line of the first paragraph of President Biden’s Executive Order, “Tackling the Climate Crisis at Home and Abroad,” is crucial to turning back the tide on climate change and informs the entire document, including Section 216(c), which directs NOAA to collect recommendations on how to make fisheries, including aquaculture, and protected resources more resilient to climate change.

Two things are required for success: 1) a significant monetary commitment for fishermen-driven cooperative research, including enhanced annual surveys using industry vessels, and 2) a reliance on the perspective and experience of commercial fishermen and the communities they support, as they are on the front lines of climate change.

The following is one of many examples where commercial fishermen, whose livelihoods have depended on the ocean for generations, have been out in front of regulators and officials in recognizing the impacts of climate change. And they have been there alone.

Small-boat fishermen noticed scallops increased spawning from once to twice a year and, likely, with fewer young. Scallops are valued fourth in the nation at \$541 million.<sup>1</sup> The Cape Cod Commercial Fishermen’s Alliance, a member-based, non-profit organization that works to build lasting solutions to protect our ecosystem and the future of our fisheries, proposed a research project that would study how

**Celebrating 30 years. Navigating 30 more.**

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warming waters were impacting reproduction for the economically critical sea scallop. The sustainably harvested scallop is one of many domestic fisheries that uses far less energy than agriculture to help feed the nation, and reduces the carbon footprint created from importing seafood. Despite the economic and cultural value of the fishery and the extreme concern expressed by fishermen, the study went unfunded.

Studies, although essential in providing the opportunity to proactively deal with the challenges of a changing climate, are not enough alone. There needs to be an overarching, decision-making management structure, which can bring the different regulatory agencies together to develop comprehensive plans that make a difference in the battle against climate change.

Again, we reference the sea scallop. Ocean acidification (OA), often called climate change's evil twin, is driven by global increases in atmospheric carbon dioxide, and exacerbated by warming waters and local nutrient pollution leading to eutrophication of coastal waters. As pH decreases so do carbonate ions needed to form shells, which forecasts trouble for shellfish such as oysters and sea scallops, and to a lesser, but still worrisome extent, lobsters. Research shows that ocean acidification can reduce mollusk survival rates by 34 percent and that surviving mollusks can be 17 percent smaller.<sup>2</sup>

The interconnectedness of the sea, intertidal areas and land are not trivial. Decisions and regulations in regard to land use, and the essential protection of marshes, is imperative if we want to avoid the further perils of climate change. If we want to prevent the collapse of coastal communities, we cannot continue to allow nitrogen from development to course into our estuaries or be dismissive of the exponential loss of marshland.<sup>3</sup> Restoring tidal wetlands will go a long way in sequestering carbon, one study estimates that 12 million metric tons of CO<sub>2</sub> can be sequestered annually through restoration.<sup>4</sup>

We must also protect the essential infrastructure of working waterfronts as they continue to innovate and change. As coastal communities see harbingers of significant changes wrought by climate change and move to forestall them, we want to see more climate-resilient improvements to infrastructure.

There is not a singular driver of climate change, therefore the solution cannot be singular.

We cannot begin to address the immense challenge of climate change with a patchwork and often conflicting fiefdoms of management. We advocate for a new regulatory framework with multi-jurisdictional authority based upon natural ecosystems (not political boundaries). We as fishermen and fishing organizations are acutely aware of the rapid changes in our ecosystem, such as shifting stocks of commercially important species and their prey. Management requires a more adroit

and encompassing system to address issues stemming from climate change and the ability to quickly use catch information. We further propose the climate change information the agencies use be open source and inclusive of data driven from outside of government. The resources of private and non-profit entities need to be brought to bear if we intend to address this growing threat.

An important cog in this super agency wheel should be the regional fishery management councils. The New England Fishery Management Council has put years into developing a model ecosystem-based fisheries management plan, which takes into account climate change and shifting stocks, as well as stand-alone climate change scenario planning.

The council is one of eight set up more than 40 years ago through the powerful, landmark piece of legislation known as the Magnuson -Stevens Act, which is regarded as the strongest statutory framework in the world. Councils, through public, collaborative processes, began conserving the ocean from their earliest days. Under NOAA, through a variety of conservation methods, including National Marine Sanctuaries and Marine Protected Areas, close to 70 percent of the nation's oceans have been conserved.

Thank you for the opportunity to comment on Section 216(c) of the *Executive Order on Tackling the Climate Crisis at Home and Abroad*. But we believe that building climate-resistant fisheries cannot be separated out of the larger initiative. We believe strong, sustainable fishing communities are at the heart of the larger goal the executive order aims to reach. By making protecting and supporting small-boat, coastal communities a priority, you enable foot soldiers in the battle against climate change.

Sincerely,



John Pappalardo

1. National Marine Fisheries Service (2020) Fisheries of the United States. 2018. U.S. Department of Commerce, NOAA Current Fishery Statistics No. 2018. Available at: <https://www.fisheries.noaa.gov/national/commercial-fishing/fisheries-united-states-2018>.
2. Massachusetts Special Legislative Commission on Ocean Acidification. 2021. Report on the Ocean Acidification Crisis in Massachusetts, Feb. 9, 2021. Available at: <https://drive.google.com/file/d/1Pcx8r-rSu8T4mf-FBHLRQH48KdGXP1uj/view>.

3. Bromberg, Keryn D., and Mark D. Bertness. 2005. Reconstructing New England Salt Marsh Losses Using Historical Maps. *Estuaries*, 28(6), 823-832. Available at: <http://www.jstor.org/stable/3526949>.
4. Fargione, Joseph E., et al. 2018. Natural Climate Solutions for the United States. *Science Advances*, American Association for the Advancement of Science, 4(11). Available at: [advances.sciencemag.org/content/4/11/eaat1869/tab-pdf](https://advances.sciencemag.org/content/4/11/eaat1869/tab-pdf).

