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Paul J. Howard, Executive Director
New England Fisheries Management Council

Ref: Report On Mobile Fishing Gear Effects And Citation Validity In NEFMC Documents Affecting The Atlantic Sea Scallop Fishery

Dear Mr. Howard,

Transmitted herewith is a report with far reaching implications as to how mobile gear fisheries are managed. There were three report objectives. The first was to evaluate the accuracy of scientific citations in recent FMP/EIS/EFH documents prepared by the NEFMC relative to the actual scientific papers. Dr. Emory Anderson led this analysis. The problems we found are minor. Council staff did a credible job in assembling the documents.

The second objective was to ascertain the validity of studies about dredging impacts, particularly those included in Council documents. There are major problems with several studies that purport to measure productivity, but only assess what can be caught in sampling dredges or coring tools, missing all the fish and what the fish have eaten. The authors did not return sufficiently, nor did they compare against suitable controls. Several references and their implications should be replaced. This is not a problem with the Council staff, but rather with the available literature.

The third objective was to determine if the literature supports the hypothesis that dredging can cause increased productivity. When I left fishing to join NMFS, my father charged me with learning why dredging caused a bloom of quahog production in Fairhaven, MA. I found the answer several years ago and shared it with my NMFS colleagues and family, planning to write a paper some day. A cousin raised it with me a year ago, but with respect to sea scallops. I then proposed a study of my hypothesis to the Fisheries Survival Fund. The findings are integrated with the other elements of this report. In brief, dredging disturbs the sea floor removing the film of fine silt, algae, and detritus that suffocates and clogs the gills of setting bivalve, polychaetes, flounder, and other larvae, and can suffocate herring egg masses. This is the primary effect, but there are several others that can contribute to increasing productivity.

Sincerely,

John T. Everett
President