



## Testimony of the Island Institute about the Impact of Proposed Right Whale Risk Reduction Measures

October 11, 2022

The following testimony is submitted on behalf of the Island Institute, a nonprofit community development organization, based in Rockland, Maine. The Institute was founded in 1983, and for nearly four decades has served Maine's island and coastal communities, with an emphasis on strengthening the resilience of communities facing economic, social, and environmental change.

Lobstering is the economic and cultural backbone of much of coastal Maine. In some towns, one of every four families hold a lobster license, and these communities would be irrevocably changed if proposed right whale reduction plans do not carefully and intentionally address the impacts to the 4,500 small business owners participating in this fishery.

Maine's fishing industry has a history of cooperating with state and federal regulations aimed at balancing environmental and economic concerns, including reducing the amount of line in the water and innovating to reduce the likelihood of entanglements. We are extremely concerned about the potential for the proposed measures to be unnecessarily broad and to occur on an implementation timeline that will cause significant harm to communities. Furthermore, it is unclear whether the proposed measures will ultimately help right whales.

**We urge the National Marine Fisheries Service (NMFS) to provide sufficient time to develop alternatives as well as to carefully consider the timeframe for implementing the resulting measures. We strongly encourage NMFS to seek targeted solutions that reduce human impacts.**

Maine's island and coastal communities are intricately tied to the fishing industry and would bear a disproportionate load should the proposed measures be implemented. Impacts to a 90% risk reduction would extend far deeper than simply reduced profits and catch for the lobster industry—they would jeopardize the year-round viability of entire island and coastal communities. The following data, compiled by the Institute in our Waypoints Community Indicators publications,<sup>1</sup> demonstrates just how vulnerable Maine's island and coastal communities are to these drastic changes:

- 10% of the residents in some island and coastal communities hold a lobster license. That increases to 21% on Vinalhaven and 29% in Beals. Between kids, grandparents, and partners (and these numbers do not count sternmen), many, and in some cases most, of the families in island and coastal communities are directly connected to the lobster fishery.

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<sup>1</sup> <https://www.islandinstitute.org/stories/waypoints/>

- 75% of island and coastal communities have fewer than 3500 residents, 25% have fewer than 800. Maine's island and coastal communities are small towns with limited resources and in many cases limited opportunities. Smaller, rural communities have capacity and financial challenges that can limit investments in infrastructure and economic development. Being surrounded by water further constrains island communities and poses significant challenges to accessing various services.
- Maine's island and coastal communities have nearly twice the national average of self-employed people and that goes up to 3, 4, and even almost 5 times the national average as you go down the peninsulas and out onto the islands—where lobstering is the mainstay.
- Our schools are small. Out of 44 island and coastal high schools, 37 of them are smaller than the national average. Half of them (22) have less than 100 graduates annually. A quarter (12) have fewer than 50 graduates. A few families moving away can cause significant impacts and lead to school closures. On islands, it is incredibly challenging to bus students to the next town. The health and wellbeing of the children and families who rely on our working waterfront and make up our island and coastal communities need to be prioritized as much as the health of whales.
- Maine's coastal communities, particularly island communities, bear significantly higher energy costs, amplifying the impact of any negative changes to local economies.

Minimizing the highly disruptive impacts to fishermen and communities should be a key design principle for any measures. Broad measures or measures implemented too quickly could easily cause unnecessary impacts to these communities. We urge the NMFS to take a highly targeted approach that recognizes the diversity of fishing businesses and operations along the coast.

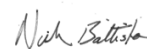
We also urge NMFS to tailor any measures to the smallest spatial scale possible. Utilizing a realistic spatial scale recognizes the actual risk of a whale being in some of Maine's near coastal waters, harbors, and in between island communities is vastly different from the potential risk posed by vertical lines further offshore.

It is worth noting that earlier whale regulations recognized the unique challenges facing island communities and established a small buffer around the community that would allow fishing activity to continue with different requirements. **At a minimum, the exemption line should remain in place and allow for opportunities for people to fish in our bays, harbors, and rivers, even if there are seasonal closures or other measures further offshore.**

Please consider the health and wellbeing of our island and coastal communities as you develop these measures to protect the right whale population. We believe there are measures that can be protective of whales and have far less impact on Maine's coastal and island communities. **Please allow sufficient time to develop targeted measures and an implementation timeframe that does not devastate Maine's lobster fishery or the island and coastal communities which depend on it.** Thank you for your consideration.



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