

September 17, 2021

Dear Shellfish Advisory Council members,

Members of several Downeast communities representing shellfish harvesters, shellfish committee members and law enforcement personnel met this summer to discuss the Shellfish Program Management Criteria proposal introduced at the last SHAC meeting. We appreciate the Department's attempt to improve local and state co-management of shellfish and hope that any such changes are developed collaboratively with local shellfish committees, harvesters and wardens on important issues that will create positive effects on Maine shellfish management.

The key issue that shellfish co-management in Maine recognizes is **that each coastal community in Maine has differing ecological, geographical, and social issues**. This system provides flexibility that is essential to adaptive management needed to manage this local resource that varies so much from one town to the next. Many of these proposed changes would eliminate the basic elements of that flexibility and will risk eroding our ability to successfully manage shellfish resources in our varying and changing coastal ecosystems.

Several of the proposed changes such as linking license allotment to survey results lack the context of what that survey would look like and how it would be translated into license numbers. This "one size fits all" approach would eliminate a town's ability to manage their fishery based on their own goals and knowledge of a local resource. For this to be considered further, development of the survey method is needed and a discussion on how survey results would be used must be considered.

The idea of setting "use it or lose it" performance requirements is contrary to any other fishery that the State of Maine manages and should not be considered for just one fishery. Other requirements suggested, such as changing residency requirements for people that leave town due to cost of living restrictions and still being able to obtain a resident license, are tools that shellfish committees already have access to. Towns currently have the ability to change the definition of residency within the context of their ordinance with the approval of the Department.

Improving any fishery management plan is a positive step forward, but in this co-managed fishery, it is something that should be developed at a state-wide scale that describes how Maine DMR will improve management by taking advantage of local capacity and knowledge of local managers and harvesters. Development of this type of plan should be a thoughtful process involving state and local managers and other stakeholders working to improve our co-management system. For a successful management plan to be developed it must involve broader input from scientists, local managers, law enforcement, and harvesters.

There are several proposed changes that this group unanimously supported. We agree that municipalities should be required to form a shellfish committee as part of their ordinance. This is a significant responsibility and should require a commitment by municipalities to do the work needed for successful fisheries management. Additionally, we support working to create better State/Federal/other permitting processes that can streamline multiple communities using similar methodology to monitor, conserve, and/or enhance shellfish populations.

We also support improving enforcement capabilities to the degree that it remains possible and affordable for towns. We were briefed on current work being done in the municipal shellfish warden program and have confidence that improvements already underway in the training program will be successful in further supporting this important aspect of shellfish management.

In closing, **this group recognizes and appreciates the Departments goals and actions in trying to improve how we co-manage shellfish in the state of Maine.** Shellfish have always been, and will continue to be, one of the most important commercial fisheries in the state of Maine and everything that can be done, should be done to preserve it through adaptive, nimble, and informed management practices that combine the capacity of the state and municipalities. It is for that reason that **we recommend that a sub-committee or task force made up of SHAC members and other invited parties be formed to review past audits, receive broad input, and make specific recommendations on how we can make improvements on the co-management system that we entrust to manage this incredible fishery for our future generations.**

We thank you for starting this discussion on improving shellfish management and hope the SHAC considers these thoughts and insights as it discusses potential changes to shellfish co-management.

Respectfully,

Mike Pinkham, Gouldsboro and Steuben Shellfish Warden

Lewis Pinkham, Milbridge Shellfish Committee

Chris Petersen, Bar Harbor Shellfish Committee

Ron Parritt, Steuben Harvester

Brooklin Shellfish Committee (Voted unanimous support)

Kathleen Billings, Stonington Town Manager

James Fisher, Deer Isle Town Manager

Bailey Bowden, Penobscot Shellfish Committee Chair/Harvester

John Higgins, Sedgwick

George Powell, Deer Isle/Stonington Shellfish Committee Chair/Harvester

Meeting facilitated and synthesized here by Mike Thalhauser, Maine Center for Coastal Fisheries