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New England Fishery Management Council

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C.M. "Rip" Cunningham, Jr., *Chairman* | Paul J. Howard, *Executive Director*

Draft Amendment 19
to the
Northeast Multispecies Fishery Management Plan

Written Comments

Comments received through April 13, 2012

Woneta M. Cloutier

From: Dan Farnham <offshorefishery@aol.com>
Sent: Wednesday, April 11, 2012 8:47 PM
To: comment
Cc: Dan Farnham
Subject: Comments on Small-Mesh Multispecies Amendment 19

Dear Mr. Howard,

I am writing this letter to comment on the proposed Amendment 19 to the Small-Mesh Multispecies Plan. In the Northern Stock Area I would agree with all of the preferred alternatives. I would also agree with an incidental possession limit of 400 lbs for red hake and 2000 lbs for silver hake. I think that the council should also give some consideration to a year round possession limit for red hake of 3000 lbs in the Northern Area. Red hake has the potential to become a choke species for the directed silver hake fishery and a year round possession limit might keep fishermen from targeting red hake when the price is high therefore keeping landings low but not turning them into discards.

One item that I would like to raise is the possibility of the council using the non preferred alternative of using landings targets, or separate allocations, for the different Small-mesh exemption area programs in the Northern area. The Amendment proposes using VTR data from 2004 to 2010 as the basis for allocating the landings targets for each program instead of using dealer data as has been done with just about all other fisheries including every other aspect of the Small-mesh Multispecies plan. The use of VTR data instead of dealer data would decrease the estimated red hake allocation percentage for Cultivator Shoals from 45% to 18% while increasing the inshore programs up to almost 57%. If the Council uses this non preferred alternative then I would suggest using dealer data for allocation purposes and using a roll over system so that unlanded quota can be landed later in the other areas.

As far as the Southern Stock area I would also agree with all of the preferred alternatives including the incidental possession limits of 400 lbs and 2000 lbs for red and silver hakes respectively. Again, and for the same reasons as in the Northern area, I would propose using a year round possession limit on red hake of 4500 lbs to keep fishermen from targeting red hake when the price is high. I agree that the Southern TAL's should be allocated by quarter in the case of red hake in 2012 but for the silver hake I think you could wait for a trigger when landings exceed 2/3rds of the next years TAL.

For TAL monitoring the preferred alternative of weekly VTR's seems appropriate. Regarding the requirement of accountability measures I agree with the preferred alternative of using an adjustable TAL trigger for the incidental landings trip limit.

I closing I believe that the Council is long overdue in implementing a limited access program for Small-mesh multispecies. The Council attempted to create a limited access program back in the early 2000's during the development of Amendment 12 but the limited access portion of the plan wasn't approved by NMFS. The Council again attempted limited access in this fishery in 2006 but dropped the ball due to a discrepancy in landings data. With the consolidation of permits in other fisheries and an abundance of unused vessels it is only a matter of time before new vessels start targeting the small-mesh fisheries which would put more pressure on the red hake stocks and depress the sometimes fragile market for silver hake. At the same time the Council should consider increasing the trip limit for silver hake by a percentage for the directed fleet to try to offset the raising cost of fuel. One option to consider is to develop a program for the eastern fishery in the Southern area that would allow for a double trip limit once per week. As it stands now most of the vessels that fish there land two trips per week with the associated fuel costs of steaming back and forth twice. Such a program would cut their fuel consumption almost in half. There is a lot that should be done with this

fishery beyond the obligation of satisfying the requirements of the Magnuson-Stevens Act. I hope that the Council can take the initiative to do so in the coming year.

Thank you for considering my comments on Amendment 19 at this time.

Dan Farnham, VP satifing
Blue Water Fisheries, Inc.

Woneta M. Cloutier

From: JDHLCL@aol.com
Sent: Thursday, April 12, 2012 9:17 AM
To: comment
Subject: Fwd: Comments on Small-Mesh Multispecies Amendment 19

From: JDHLCL@aol.com
To: comment@nemfc.org
Sent: 4/12/2012 9:15:09 A.M. Eastern Daylight Time
Subj: Comments on Small-Mesh Multispecies Amendment 19

Dear Mr. Howard,

I am writing this letter to comment on amendment 19 of the small mesh multi species plan. I agree on all the preferred alternatives for both the northern and southern areas.

I do have a problem with the use of VTR data as an allocation tool, when dealer data has always been the measuring stick for setting quotas and allocations. I do not believe the changing of standards is the appropriate thing to do in the middle of developing a fishing plan. The use of VTR data versus dealer data greatly changes the allocation percentage of red hake between the inshore areas and the offshore cultivator shoals fishery and unfairly disadvantages the larger directed whiting boats.

In regards to red hake, the potential for it, to be a choke species to the silver hake fishery, would leave me to believe trip limits should be instituted... something like 5000LBS per trip would be in line.

Lastly, the council needs to consider a trip limit increase for this fishery. With the ever rising cost of fuel and the long distances traveled to catch whiting, I believe the trip limit should be increased to 40,000lbs per trip...

Thanks,

Hank Lackner
L & G Fisheries, Montauk, New York

