

#8a

Additional Correspondence

September 20, 2012

Rip Cunningham, Council Chairman
New England Fisheries Management Council
50 Water Street
Newburyport, Massachusetts 01950



RE: Fleet Diversity

Dear Mr. Cunningham,

It's time to stop crisis management and start fixing the core problems. Consolidation of the fishing industry and lack of protections threaten the fish, family fishermen, and leads to one crisis after another that distracts the Council from dealing with the real problems facing our ocean. In just two years of the new Catch Share policy, we have seen what it can do to the fish stocks that fishermen worked so hard to rebuild.

The Council can't hide behind short-term emergencies that are rooted in problems associated with consolidation and the disappearance of family fishermen. This is a major problem because family fishermen support local economies, a healthy ocean, and access to locally harvested food.

I urge you to adopt policies that protect fleet diversity, level the playing field for family fishermen, and ensure that the rights and access to fish are NOT concentrated into the hands of a few players.

Consolidation is not conservation.

Sincerely,

Jason Jarvis, Westerly, Rhode Island, 02891
Bonnie McCay Merritt, Bridgewater, New Jersey, 08807
Robert Steneck, Whitefield, Maine, 04353
Gary Libby, Port Clyde, Maine, 04855
Rick Anderson, Rye, New Hampshire, 03870
Leesa Cobb, Port Orford, Oregon, 97465
Brian Pearce, North Yarmouth, Maine, 04097
Shannon Eldredge, West Chatham, Massachusetts, 02669
Louis Williams, Salem, Massachusetts, 01970
Padi Anderson, Rye, New Hampshire, 03870

cc: TN, FH, Council (9/20)

Ted Ames, Stonington, Maine, 04681
James Keding, Plymouth, Massachusetts, 02360
Amanda Beal, Freeport, Maine, 04032
Timothy Barrett, Duxbury, Massachusetts, 02332
Zeke Grader, San Francisco, California, 94129
Jared Auerbach, Natick, Massachusetts, 01760
Rev. Dr. Robert Ross, Mansfield, Massachusetts, 02048
Morgan Parker, Plymouth, Massachusetts, 02360
Kathi Turner, Gloucester, Massachusetts, 01930
Jim Turner, Gloucester, Massachusetts, 01930
Shareen Davis, South Chatham, Massachusetts, 02633
Rob Odlin, Scarborough, Maine, 04074
Diane Wilson, Seadrift, Texas, 77983
Alex Friedman, Edgartwon, Massachusetts, 02539-6142
Hilary Dombrowski, Gloucester, Massachusetts, 01930
Katherine Ozer, Washington, District Of Columbia, 20009
Christina Schiavoni, New York, New York, 10034
Stephen Bartlett, Louisville, Kentucky, 40206
Joann Lo, Glendale, California, 91207
Tanya Kerssen, Oakland, California, 94618
Russell Libby, Mount Vernon, Maine, 04352
Christopher Scanlan, Damariscotta, Maine, 04543
Robert Lesnikoski, East Fairfield, Vermont, 05448
Ravi Khanna, Malden, Massachusetts, 02148
Marilyn Borchardt, Oakland, California, 94618
Bev Veals, Carolina Beach, North Carolina, 28428
JustIn Mcaneny, Philadelphia, Pennsylvania, 19130
Laura Bellon, Oakland, California, 94618-1040
Lisa Griffith, Columbia, Missouri, 65203
Miriam Boyer, Chapel Hill, North Carolina, 27516
Elizabeth Henderson, Newark, New York, 14513
Leeann Edyvane, Reedville, Virginia, 22539
Vicki Garrett, Columbus, Ohio, 43207
Robert Hines, Redwood City, California
Patience W., Brewer, Maine, 04412
J. Huston, Oakland, California, 94606
Nancy Romer, Brooklyn, New York, 11215
Steve Gilman, Stillwater, New York, 12170

Brenda Biddle, Dummerston, Vermont, 05346
Tracy Dyckhoff, Bering Sea, Alaska, 99661
Kristine Harder, Haines, Alaska, 99827
Arianna King, Louisville, Kentucky, 40204
Licia Trudeau-Caldwell, Hatteras, North Carolina, 27943-0067
Vivienne Wulff, Fredericksburg, Virginia, 22406
Ross Pearsall, Newport, Rhode Island, 02840
Cynthia Bush, Gloucester, Massachusetts, 01930
Anne D Burt, Edgecomb, Maine, 04556
Angela Hagigeorges, Rockport, Massachusetts, 01966
John Richard Young-Higgins, Norristown, Pennsylvania, 19401-1531
Joy Peterson, Sinsinawa, Wisconsin, 53824, United States
Suzy Costello, Boston, Massachusetts, 02108
Virginia Nickerson, North Chatham, Massachusetts, 02650
Sam Nickerson, Centerville, Massachusetts, 02632
Andrew Kang Bartlett, Louisville, Kentucky, 40207
Michele Reilly, San Jose, California, 95116
Virginia Husting, Boise, Idaho, 83705
Matthew Canfield, Brooklyn, New York, 11205
Donald Sack, Whitethorn, California, 95589
Georgia Sack, Arcata, California, 95521
Diane Sims, Las Vegas, Nevada, 89142
James Seaman, Tucson, Arizona, 85705
Amanda Kloer, Washington, District Of Columbia, 20001
Maureen Smith, Whitethorn, California, 95589
Tim Girrback, Elizabeth, New Jersey, 07208
Ronald Borjeson, Plymouth, Massachusetts, 02360
James Mulcare, Clarkston, Washington, 99403-2576
Brett Tolley, Brooklyn, NY 11215
Molly Glasper, Eureka, California, 95503
Andrew Sible, McKinleyville, California, 95519
Dawn Tolley, Chatham, Massachusetts, 02633
Amanda Wood, Carlotta, California, 95528
Heather Lehman, Vancouver, Washington, 98660
Ian Hoffman, Chatham, Massachusetts, 02633
Linda Evans, San Diego, California, 92117-3819
Edward Laurson, Denver, Colorado, 80235
Deborah Denham, Fortuna, California, 95540

Aaron Longton, Port Orford, Oregon, 97465
Geoffrey Day, Newburyport, Massachusetts, 01950
Lori Day, Newburyport, Massachusetts, 01950
Rachel Donkersloot, Anchorage, Alaska, 99518
Theresa Smith, Somerville, Massachusetts, 02145
jason morse, westbrook, Maine, 04068
Lisa Forness, St Louis, Missouri, 63141
Michael Steele, Morrice, Michigan, 48857
jennifer Hilton, Princeton, Massachusetts, 01541
Karen Masterson, Sherborn, Massachusetts, 01770
Karissa McCarthy, Port Murray, New Jersey, 07865
Katrina Kazda, Arlington, Massachusetts, 02476
Alexander Barber, Cambridge, Massachusetts, 02140
Kean Fleming, Langlois, Oregon, 97450
Lorna Thompson, San Marino, California, 91108
Georgi Adams, South Chatham, Massachusetts, 02659
shedy berrios, jacksonville nc, North Carolina, 28540
Aaron Thiele, Eureka, California, 95501
Chelsea Hebard, Whitethorn, California, 95589
Sarah Howard, New Orleans, Louisiana, 70119
J. Patrick Hart, Pisgah, Iowa, 51564
Brad Wilson, Springville, Iowa, 52336
Joann Lo, Glendale, California, 91207
Joe Grafton, Plainfield, Massachusetts, 01070
Orson Moon, Jamaica Plain, Massachusetts, 02130
Karen Johnson, Groton, Massachusetts, 01450
abby evankow, Gorham, New Hampshire, 03581
Donald Ackerman, Norwood, Massachusetts, 02062
Craig Hird, Salem, Massachusetts, 01970
Karen Pierce, Acton, Massachusetts, 01720
Ed Falis, Ipswich, Massachusetts, 01938
Patricia A Hogan, Cambridge, Massachusetts, 02140
Thomas Traina, Harwich, Massachusetts, 02645
Marge Townsend, Windsor, Ohio, 44099
Janet Campbell, Dover, New Hampshire, 03820
Annette Slonim, Brooklyn, New York, 11216
Katherine Sniffen, Waltham, Massachusetts, 02452
Todd Sievel, Brighton, Massachusetts, 02135

Regina Dlugokencky, centerport, New York, 11721
John Goodman, Belmont, Massachusetts, 02478
Aaron Salter, Westminster, Maryland, 21157
Olga Pelecky, Holliston, Massachusetts, 01746
Monica T, Honolulu, Hawaii, 96813
Jan DEKENIS, Cambridge, Massachusetts, 02140
David Phillips, Medford, Massachusetts, 02155
Dan Donato, Marblehead, Massachusetts, 01945
Ernest J.P. Muhly, Walkersville, Maryland, 21793
Michele C, Reading, Massachusetts, 01867
Marion Sibley, Gloucester, Massachusetts, 01930
Kim Libby, Port Clyde, Maine, 04855
cheryl montale, ipswich, Massachusetts, 01938
Ann Lafferty, Gloucester, Massachusetts, 01930
sheila king, newburyport, Massachusetts, 01950
Terry d'Selkie, Ukiah, California, 95482
Wendy Fitting, Gloucester, Massachusetts, 01930
Cheryl Davis, Gloucester, Massachusetts, 01930
Rebekah Wilce, Madison, Wisconsin, 53703
Dave Smith, Ukiah, California, 95482
Maria Sutto, Pond eddy, New York, 12770
Bruce Bornstein, Marblehead, Massachusetts, 01945
Colleen McKiernan, Somerville, Massachusetts, 02144
Rose Hanig, Cambridge, Massachusetts, 02139-2637
Mary Hewey, Jamaica Plain, Massachusetts, 02130
Andres Aguirre, Belmont, Massachusetts, 02478
Eric Huskinson, Fenton, Michigan, 48430
Amy Austin, Acton, Massachusetts, 01720
Elizabeth Bish, Gloucester, Massachusetts, 01930
Margaret D. Russell, Wunchester, Massachusetts, 01890
dorothy baldini, brookline, Massachusetts, 02445
Rocky Burns, San Francisco, California, 94129
Tina Clarke, Amherst, Massachusetts, 01002
Dave Lacey, Gold Beach, Oregon, 97444
Bill Duesing, Oxford, Connecticut, 06478
Jane Maher, oxford, Connecticut, 06478
michael donagher, farmington, Connecticut, 06032
Danielle Tolley, Brooklyn, New York, 11215

Daniel Atienza, Brooklyn, New York, 11216
Loryn Simonsen, Astoria, New York, 11106
john arsenault, wellfleet, Massachusetts, 02667
Chris Hamel, Quincy, Massachusetts, 02169
Thomas Kandler, Canton, Massachusetts, 02021
James maloney, Pocasset, Massachusetts, 02559
Susan West, buxton, North Carolina, 27920
Jay Michaud, Marblehead, Massachusetts, 01945
Jason Tucker, Jamaica Plain, Massachusetts, 02130
william chaprales, marstons mills, Massachusetts, 02648
Jason Allen, canton, Massachusetts, 02021
Kevin Odell, Gloucester, Massachusetts, 01930
Christy Crutchfield, Northampton, Massachusetts, 01060
Joyce Bakker, East Harwich, Massachusetts, 02645
Mark Brown, East Falmouth, Massachusetts, 02536
Sandy Estell, East Liverpool, Ohio, 43920
Jesse Browning, Gloucester, Massachusetts, 01915
Nicholas Maloney, West Roxbury, Massachusetts, 02132
Skip Mildrum, Durham, Maine, 04222
Beth Germain, Gloucester, Massachusetts, 01930
James Lausier, peaks island, Maine, 04108
raminta moore, portland, Maine, 04101
David Whitehouse, Dubois, Pennsylvania, 15801
Freya Hoffman-Terry, Somerville, Massachusetts, 02143
Mary Coughlan, Waltham, Massachusetts, 02451
Colleen Culley, Rochester, New York, 14607
Amy Chalker, Santa Barbara, California, 93101
sharyle patton, bolinas, California, 94924
Jennie Porter, Chatham, Massachusetts, 02633
Lindsay Keiter, Williamsburg, Virginia, 23185
Hains Christina, Provo, Utah, 84606
greg bennett, harwich, Massachusetts, 02645
Rebecca Taylor, wellfleet, Massachusetts, 02667
Steve Hardy, Lake Bluff, Illinois, 60044
Nicole Weber, Pasadena, Maryland, 21122
Rosemarie Denn, North Chatham, Massachusetts, 02650
Maegan S, South Chatham, Massachusetts, 02659
Niaz Dorry, Gloucester, Massachusetts, 01930

Suska Matsik, West Chatham, Massachusetts, 02669
mark sutherland, nantucket, Massachusetts, 01742
Ellaine Lurie-Janicki, West Haven, Connecticut, 06516
Sophia Lombard, West Yarmouth, Massachusetts, 02673
Kelly McInturff, Corpus Christi, Texas, 78404
Philip Montminy, Las Vegas, Nevada, 89123
virginia alberts, orleans, Massachusetts, 02653
David Sadoski, Harwich Port, Massachusetts, 02646
Rory Behnke, Lubbock, Texas, 79413
James Long, Corpus Christi, Texas, 78412
Bryn Warren, Somerville, Massachusetts, 02145
Gef Flimlin, Toms River, New Jersey, 08755
Ashley Kenney, Corpus Christi, Texas, 78414
Michael Altschul, Riverside, California, 92505
allegra banducci, Nome, Alaska, 99762
Laura Kelley, north eastham, Massachusetts, 02651
Meribeth Ratzel, Harwich, Massachusetts, 02645
Steven Nelson, League City, Texas, 77573
Kristin Reilly, Saint Petersburg, Florida, 33711
James Nordstrom, Bedford, New Hampshire, 03110
Jeanne Brooks, Orrs Island, Maine, 04066-0008
Robert Scherf, Philadelphia, Pennsylvania, 19128
Larry and Mary Knapp, Boothbay, Maine, 04537
Leyton Curtis, Mt Vernon, New York, 10552
Warren Burkholder, Houston, Texas, 77008
Bobbie Burkholder, Bainbridge Island, Washington, 98110
Alan Freedman, Cornville, Arizona, 86325
Tristan Quinn-Thibodeau, Brooklyn, New York, 11216
Nancy Foster, Mont Vernon, New Hampshire, 03057
De Peaslee, South Portland, Maine, 04106
Rebecca Brownlie, Bellingham, Washington, 98226
Randall Smith, Northampton, Massachusetts, 01060
Wendy Dolliver, Southwest Harbor, Maine, 04679
mynalee johnstone, saltspring island, Washington, 98723
Catherine Schwenk,"Freeport,", Maine, 04032
Jacqueline Bort, Chesapeake, Virginia, 23320
Kara Johnson, Providence, Rhode Island, 02906
Pat Isaacs, West Deptford, New Jersey, 08051

J Albano, Seabrook, New Hampshire, 03874
Erin Soucy, Colebrook, New Hampshire, 03576
Antonia Small, Port Clyde, Maine, 04855
Christopher Graham, New York, New York, 10034
Kelly Renn, "Astoria, NY", New York, 11106
Corey Cate, Tracy, California, 95376
Ann Getsinger, New Marlborough, Massachusetts, 01230
nick bowman, wake forest, North Carolina, 27587
Cassie Kilbride, Tenants Harbor, Maine, 04860
Jayne Steinmetz, Almond, Wisconsin, 54909
Valerie Garrigan, Thomaston, Maine, 04861
Jonathan Bailey, Tenants Harbor, Maine, 04860
John Enge, Central Point, Oregon, 97502
Darlene Hinkle, Kitty Hawk, North Carolina, 27949
Linda H. Small, Port Clyde, Maine, 04855
Cynthia Price, Muskegon, Michigan, 49441
Lindsay Buchanan, New Haven, Connecticut, 06511
Becca Calendo, Schaumburg, Illinois, 60195
fernanda de campos, san diego, California, 92105
Katherine Collins, Washington, District Of Columbia, 20016
Saulo Araujo, Boston, Massachusetts, 02130
Salena Tramel, Brooklyn, New York, 11206
Lisa Archer, Oakland, California, 94609
Joshua Martin, Asheville, North Carolina, 28806
Monica Wilson, Berkeley, California, 94703
Ally Tarbous, Philadelphia, Pennsylvania, 19122
Jackie Dragon, Oakland, California, 94611
Gillian Gurish, Dedham, Massachusetts, 02026
Navina Khanna, Oakland, California, 94610
Marisa Anand, Newport, Rhode Island, 02840
Ariana de Lena, Oakland, California, 94618
Christine James, Jamaica Plain, Massachusetts, 02130
judy robinson, marlboro, Vermont, 05344
Sara Mersha, Jamaica Plain, Massachusetts, 02130
Roberta Packer, Lanesborough, Massachusetts, 01237
Kerry Marhefka, Mt Pleasant, South Carolina, 29464
Alexandra Scranton, Pullman, Washington, 99163
Zach Elfers, Newark, Delaware, 19711

Chris Iberle, Seattle, Washington, 98107
Chris Chapron, Watertown, Massachusetts, 02472
Janet Stanton, Sheffield, Massachusetts, 01257
Anna Sherman ,new york, New York, 10025
Kate Newburger, Brooklyn, New York, 11217
Gerald Leape, Washington, District Of Columbia, 20016
Abigail Seiler, Baltimore, Maryland, 21212
Sarah James, Petaluma, California, 94952
Joan P Mencher, NY, New York, 10023-2769
Ruth Sellers, Mt Home, Arkansas, 72653
CATA The Farm workers Support Committee, Glassboro, New Jersey ,08028
bev bull, frisco, North Carolina, 27936
Marian Feinberg, Bronx, New York, 10463
M. Jahi Chappell, Portland, Oregon, 97214
Adriana Voss-Andreae, Portland, Oregon, 97214
Molly Anderson, Bar Harbor, Maine, 04609
Biola Jeje, brooklyn, New York, 11225
keith Flyn, ft. lauderdale, Florida, 33334
Nancy Lee Fostr, Hatteras, North Carolina, 27943
Pam` Morris, Smyrna, North Carolina, 28579
Ariele Baker, Highland Park , New Jersey, 08904
Mark Hooper, Smyrna, North Carolina, 28579
michael hubbard, lanexa, Virginia, 23089
Rachel Scott, Whitewater, Wisconsin, 53190
carla reynols, buxton, North Carolina, 27920
Karen Huizing, Buxton, North Carolina, 27920
Zachary Hajian, Ann Arbor, Michigan, 48104
Laurie Kellogg, Manteo, North Carolina, 27954
Zoya Benjamin, halfmoon bay, California, 94019
Allyson Lynch, Brooklyn, New York, 11218
Jean Hamilton, Starksboro, Vermont, 05487
Jessica Zemaitis, Vancouver, Washington, 98665
Katy Riker, Portland, Oregon, 97211
Steven Jones-D'Agostino, Worcester, Massachusetts, 01604
Jayne Chase, Marlborough, New Hampshire, 03455-2532
Catherine Badgley,C helsea, Michigan, 48118
Jay Groccia, Boylston, Massachusetts, 01505
Carol Hebert, Danvers, Massachusetts, 01923

Andy Spalding, Cumberland Foreside, Maine, 04110
Heather Retberg, Penobscot, Maine, 04476
Jay Peterson, Sedgwick, Maine, 04676
Suzanne Buglione, Fall River, Massachusetts, 02720
Stephanie Webb, Port Orford, Oregon, 97465
Maggie Robertson, Sligo, Pennsylvania, 16255
Karim Shumaker, Port Orford, Oregon, 07465
Ofurhe Igbinedion, Berkeley, California, 94703
Joe Caliri, Stafford, Virginia, 22554
Maggie Fry, Conneautville, Pennsylvania, 16406,
Danny Pronk, Nantucket, Massachusetts, 02554
Chris O'Reilly, Nantucket, Massachusetts, 02554
Lyle Keeler, Langlois, Oregon, 97450
Curtis OBrien, east hampon, New York, 11937
Rebecca Wentworth, Blue Hill, Maine, 04614
Janice Black, Hanson, Massachusetts, 02341
Liz Carollo, Brooklyn, New York, 11222
Matthew Stillman, New York, New York, 10027
Nicole Dyer, Abingdon, Virginia, 24210
Mike Thuring, Hawthorne, New Jersey, 07506
Wendy H, New York, New York, 10029
Michael Azerrad, New York, New York, 10014
Laura Orleans, New Bedford, Massachusetts, 02740
David Jou, Woodside, New York, 11377
Tyson Rasor, Port Orford, Oregon, 97465
Lucy Lee, Cambridge, Massachusetts, 02140
Diana van de Hoef, New York, New York, 10016
Julie Watson, Sixes, Oregon, 97476
David Chappell, Portland, Oregon, 97211
Daniel Keeler, Port Orford, Oregon, 97465
Alyssa Nathanson, Montpelier, Vermont, 05602
Jennifer Hashley, Sudbury, Massachusetts, 01776
Sean Barrett, Bronxville, New York, 10708
nicholas gault, nantucket, Massachusetts, 02554
Anna Bressack, New York, New York, 10003
doug germain, gloucester, Massachusetts, 01930
Peg Nicholson, Van Buren, Missouri, 63965
CATHY TOTH, BROOKTONDALE, New York, 14817

Carol King Monhan, Gloucester, Massachusetts, 01930
Jacquelyn Conn, Buxton, Maine, 04093
Valerie Sousa, Kittery, Maine, 03904
Amy Peavey, Gloucester, Massachusetts, 01930
Kathleen Curtis, Schenectady, New York, 12306
Sarah Hoague, Portland, Massachusetts, 01930
dan hebert, buxton, Maine, 04093
peter mourmouras, biddeford, Maine, 04005
Julie Gunn, Ocean City, New Jersey, 08226
Milissa Knox, Tacoma, Washington, 98407
Dan Eagan, Bristol, Rhode Island, 02809
Tucker Neale, Jamestown, Rhode Island, 02835
Yesenia Marquetti, Key Largo, Florida, 33037
Kathleen Reside, Pennington, New Jersey, 08534
Penelope Scott, Eugene, Oregon, 97404
Jeanne Ewe, Pitman, New Jersey, 08071
Kerry Herrmann, Gloucester, Massachusetts, 01930
Donald Landergren, Gloucester, Massachusetts, 01930
Lori French, Morro Bay, California, 93442, United States
Manuela Barrett, Green Harbor, Massachusetts, 02041
Ray Huber Jr, Takoma Park, Maryland, 20912
Ryan Kelley, Freeport, Maine, 04032, United States
caleb easton, Portland, Maine, 04103, United States
Sheila Garzoni, Plymouth, Massachusetts, 02360
BEcky Bernie, Gloucester, Massachusetts, 01930
Christopher Newman, Eleanor, West Virginia, 25070
Rene Young, Gloucester, Massachusetts, 01930
Mary Beth Garceau, Plympton, Massachusetts, 02367
charles good, carver, Massachusetts, 02330
Jason Smith, Chicago, Illinois, 60647
patricia leontie, plympton, Massachusetts, 02367
Michael Orr, Baton Rouge, Louisiana, 70806
Adrienne Garzoni, Plymouth, Massachusetts, 02360
Mary Edwards, Saratoga Springs, New York, 12866
Trent Garzoni, Plymouth, Massachusetts, 02360
David Jenkins, Edmond Oklahoma, 73003
Keith Hall, Scaeborough, Maine, 04074
John Ullrich, Laramie, Wyoming, 82070

jeff clough, swampscott, Massachusetts, 01907
Dael Goodman, Las Cruces, New Mexico, 88011
Mary V Tegel, Williston, Vermont, 05495,
Miranda Updike, Ipswich, Massachusetts, 01938
Barbara McGovern, Weymouth, Massachusetts, 02189
Gale Preston, West Chatham, Massachusetts, 02669
Gail Dress, Chatham, Massachusetts, 02633
Monica Lussier, Chatham, Massachusetts, 02633



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

54 Chatham Drive Bedford New Hampshire 03110
office 603.206.5468; fax 603.666.5601; offshorelobster.org

September 17, 2012

Mr. John Bullard, Regional Director
National Marine Fisheries Service
55 Great Republic Way
Gloucester, MA 01930-2276

Mr. C.M. Cunningham, Chairman
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950



Dear Messrs. Bullard and Cunningham:

In 1994 Groundfish Closed Area II (CAII) was closed to mobile gear fishing; and is now under consideration by the Council for reopening. The opening of this area is a source of great concern for offshore lobstermen fishing within that area, as CAII has long been a productive lobster ground. Long before 2000, when the scallop and offshore lobster fleets came together to forge an agreement relative to fishing in CAII, the lobstermen became aware that large numbers of female lobsters, seasonally migrate into the area. In fact, last year's VTR's alone from only 8 of the 20 offshore boats fishing north of the 41°30' line in Closed Area II reported more than 1,300,000 lbs. of egg bearing females discarded between June and October, and another single vessel, alone, discarded 300,000 lbs.

I have attended Groundfish and Habitat Committee meetings on behalf of the lobstermen presently fishing in CAII, to convey the number of females thrown overboard in that area during that timeframe each year. Specifically, the area in question north of the 41°30' line in the now CAII, encompasses less than 12% of the entirety of closed areas (CAII, CAI, Nantucket Lightship, Western GOM, and Cashes Ledge) under consideration for reopening. When one pro-rates the 5 month (1 June – 31 October) closure, which would insure the viability of what the AOLA believes to be the most concentrated egg rearing ground in the offshore fishery, there would be a less than 5% impact on the access to the closed areas for the groundfish and scallop fisheries.

I have also made reference to gear conflict in the past; however, it would have been impossible to expound on my concerns of the severity of what might actually take place two-hundred miles out to sea. Needless to say the potential for conflict would be obviated if that part of CAII were seasonally closed to bottom trawling.

*u: Comit, TN, CBA (9/18)
FA,*

As was recognized by the Council, the NEFSC Science and Statistical Committee (SSC) presented a white paper in November 2010 focused on Ecosystem-Based Fishery Management. This paper followed the July 2010 White House Executive Order (EO) which proposed nine national priorities, one of which was **Ecosystem Based Fisheries Management (EBFM)**. The EO and white paper form a perfect basis for my request of the Council regarding NEPA; as part of that process, I am requesting that while formulating an economic impact statement, the NEFMC take into consideration the economic impact that would affect lobstermen, as well as the mobile gear fleet, regarding decisions relative to CAII. This process needs to be looked at in a holistic manner, taking into account everything that will be affected by the Council's and NMFS's decision. This action would constitute a true example of **EBFM**, and could possibly work as a model for other fisheries.

The AOLA has for the past 10 years proactively instituted a number of measures including but not limited to a 30% trap reduction to make the offshore lobster fishery sustainable. Starting in 2013, an additional five year trap reduction, equaling an additional 25% is scheduled to commence, bringing the overall industry consolidation plan and total trap reduction to 55%. We have also instituted a 1548 pot, individual license cap, reduced from a 3650 cap, originally established prior to the first round of reductions.

Everything we are trying to accomplish is focused on a conscious, concerted, and judicious effort to protect a resource and its habitat as well as to maintain the economic interests of the fishermen who have depended on the area for their livelihoods. In doing so, we are requesting the Council protect a particular portion of an area in the ocean, only for the amount of time necessary to insure the well-being of our brood stock and a significant portion of income of the offshore lobster fleet. These five months in question are the optimal time for the protection of females bearing eggs, as well as for a substantial harvest of those financially dependent on the fishery.

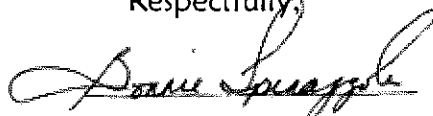
According to the white paper by the SSC, a breakout group attending a 2009 EBFM workshop determined, "Processes instituted to establish objectives and issues might identify one such overarching management goal as: *Protect ecosystem structure and function to allow optimal harvest for fishing communities and future generations*. This simple statement recognizes that to protect fisheries and fishing communities and to address other societal preferences and values, we need to protect the ecosystems on which these communities depend (p.9-10). Also on p.5 of the same document, under the heading of "NEED FOR ECOSYSTEM BASED MANAGEMENT," is noted, "In particular, it will be important for the

NEFMC to be directly involved in parallel EBFM efforts of the MAFMC and the ASMFC as these have implications for shared resources and their management." Lobster is managed through the Atlantic States Marine Commission (ASMFC), hence, this situation would prove to be an exemplary model on which to base the Council's efforts toward EBFM.

I know members of the lobster fleet who are reaching out to other fleets are optimistic that agreements can be forged to allow those planning to fish in that area, the ability to do so at the appropriate times. My members fishing in CAII are especially hopeful the Council and NMFS will take our pro-active efforts into consideration and wait to discuss the opening of Groundfish Closed Area II, until the combined group of fixed and mobile gear vessel owners has had a chance to fully vet all options, and hopefully produce a positive conclusion to this matter for all concerned.

I thank you for your attention to this matter; please feel free to contact me, should you have any questions relative to this correspondence, or any other matter.

Respectfully,

A handwritten signature in cursive script, appearing to read "Bonnie Spinazzola".

Bonnie Spinazzola
Executive Director

Cc: Paul Howard, Executive Director NEFMC
Terry Stockwell, Chairman NEFMC Groundfish Committee
Mary Beth Tooley, Chairwoman NEFMC Scallop Committee
David Preble, Chairman, NEFMC Habitat Committee

