

10/25/11

Good Afternoon,

My name is Frank Patania and I would like to share my views on sectors with you.

My family has been part of the commercial fishing industry since 1950. Over the years we have invested heavily in the business with hard work and the money earned from that work. We own three vessels and are members of the Sustainable Harvest Sector.

With the first year of sector management under our belt and nearly half way through our second; I am quite happy with the results thus far.

For the first time in years I feel like I have control of my own fate.

With a clear allotment of ACE we can get back to deciding when, where and how we want to fish in order to gain the maximum benefit out of it. I know many stakeholders , including myself have certain choke species that make things a little more difficult; but, overall I have found the ACE trading process painless and prices reasonable. Much easier and more affordable than leasing DAS was.

At this point in time I would like us to stability return to the industry by moving forward with the Sector system. By making some changes to improve Optimum Yield I think we will see the industry flourish again. I think removing some or all of the groundfish mortality closures will do just that.

One problem I do see for sector management is the prohibitive costs of monitoring. We need to find a long term solution for this.

Recently I've heard talk about reallocating ACE so that certain communities and new entrants can get their share. I think this is ridiculous. Most of us have been suffering for years under DAS and now we finally got a plan in place that allotted ACE from a ten year time span to the people who have historically harvested it and now we should just give it away! No one permit holder has enough fish now! Who decides the winners and losers?

Another concern that I have is the discussion of controlling ACE trades by vessel class and size. ACE trading in sectors is a key component of sector management and should be kept as simple and affordable as possible. This was a major flaw in the DAS management system that drove DAS prices up for vessels in larger classes. We should continue to encourage ACE trading between vessels of all sizes for the mutual benefit of all.

I want to reiterate that STABILITY is very important at this time. As an industry we are operating with an aging fleet and if you expect stakeholders to invest in new vessels we need STABILITY in our regulatory system.

THANK YOU

FRANK PATANIA

32 Clinton St.  
Portland, ME 04103

207-671-8984

10/23/11

New England Fishery Management Council:

The purpose of this letter is to provide you with my perspective on sectors.

I have been involved in the groundfish industry for my entire life as I am the son of a commercial fisherman. I currently am part owner of a family business that owns a mid-size dragger and a small gillnetter. I'm heavily invested in the industry both in paper and steel. I am part of the Sustainable Harvest Sector.

From my perspective sectors have been a success. We have been able to, for the first time in years, balance our books in the sense of individual accountability. Allotment is clear. Business plans enable us to decide how, when and where we will fish. If I don't have enough fish, I have the ability to lease. This is pretty impressive given the fact that we are only in our second year under this new management.

What this industry needs more than anything is stability and sectors have helped us achieve this. Making untimely changes to the sector system would only set our industry back by years.

There has been talk of re-allocation and even the mere mention of it creates feelings of instability. No one permit holder has enough fish as it is. Taking fish from one person to give to another is only going to make things worse. No matter how fish are allocated someone is going to be unhappy with their part of the pie. Quotas were not arbitrarily decided, rather based on historical landings. Re-allocation would most definitely lead to more problems.

Fortunately, those that don't have enough fish do have a system that allows them to lease. ACE trades, especially those between vessel classes, have created a lot of opportunity for leasing fish. Restricting ACE trades would most certainly limit access and only make it more difficult for large and small boats to do business with one another. We should continue to encourage ACE trades among boats of all sizes.

As I said before, sectors have been successful, however, there are some things the Council should consider that would make the system even more successful. First,

sector monitoring as it is currently delivered is not efficient. The cost far outweighs the benefit. We need to look for a better way to monitor at sea that is more efficient and cost effective. Fisherman are not in a position to fund this status quo monitoring going forward.

Also, mortality closures are no longer necessary. They were put in to effect when we were managed under the old days-at-sea system and no longer make sense. Closed areas are no longer necessary under hard TAC system.

The key to making the sector management system even greater is to support it fully:

- Remove closures that were established under the old system
- Devise a better (any hopefully less expensive) way to monitor at sea
- Allow vessels of all classes to trade with one another
- Let current allocation stand

and most importantly allow the sector system to prove it works before considering changes!

Please contact me if you have any questions regarding my perspective on sectors.

Sincerely,

Thomas P. Kelly

Peter W. Kelly III

Ocean Fisheries, Inc  
Celtic Pride, Inc.

Allyson Jordan  
34 Quebec Street  
Portland, ME 04101  
[eatlocalfish@me.com](mailto:eatlocalfish@me.com)

10/24/2011

Rip Cunningham, Chair  
NEFMC

The purpose of this letter is to comment on recent activities regarding sectors and the way they are managed and possible changes.

Finally, after years of smothering regulations, some that worked many that have not we have a system that is working. The system, sectors, was our only option if we wanted to remain in business. I belong to the Sustainable Harvest Sector.

Sectors have given us stability and the ability to actually run our businesses again. After DAS, closures upon closures and so many years of uncertainties- sectors are a welcome change. We have seen a steadier market for our product, our captains are not so pressured as with DAS, having the ability to actually go fishing again and not worry about a clock is actually a luxury to us. The ability to trade fish amongst ourselves and other sectors is a necessity- you need all species to fish and if you can trade and keep fishing it is a win win for all involved.

National Marine Fisheries gave us a TAC that we can harvest and remain at a sustainable level. We need flexibility to do this efficiently. There is no scientific reason for closures with sectors. We need to open these closed areas to allow us to fish more efficiently and stop leaving such a large percentage of the ACE in the water.

There has been recent rumors of certain organizations and individuals wanting and pushing for reallocations and caps. America is a capitalist country- lets keep it that way. I believe that the original allocations were quite fair. Based on history... If you did not fish, did not reinvest or sold to the black market you had no history. Do not punish those individuals who found a bank, took the loans to reinvest to remain in business. Do not punish those who did not sell for cash. Do not punish those who worked through those years and fought to stay in business. The government has given those people who are complaining permit banks already - how much more do they want. Everyone has the same opportunity to fish- buy a permit- go to a bank and invest in the industry.

As far as caps go- the thought should not be entertained, period. Look around the world, do we put caps on sports figures pay- real estate- wall street executives? How would people like it if we put a cap on how much foundation funding could be given to each ENGO???

We have only been working with sectors for one year. Leave it alone. Work on opening closed areas, observer data and getting it into the process. We also keep hearing we need more observer coverage. What have we learned from all the coverage from the first year? What are the goals of these observers and where is there data going ? We pay to be tracked on boatracs from \$135.00-600.00 per month- how much more do you want? If there are private organizations pressuring for more observer coverage- let them pay with their foundation dollars.

We have heard for years you must watch stocks for at least 5 years to see a pattern- well let's watch sectors for 5 and see if we can create a stable market, steady jobs and maybe find a new group of people wanting to work in the industry, and support local economy and US jobs.

We import 83% of our seafood in the country- supporting foreign jobs, and foreign fishing that most often have no regulations. Let's support our US fishermen and work with them on the success of sectors and help efficiently harvest the ACE that NMFS set for us.

Sincerely

Allyson E. Jordan  
F/V Theresa & Allyson  
F/V Jamie & Ashley  
Portland, ME

October 20, 2011

Mr. Rip Cunningham, Chair  
New England Fishery Management Council

Dear Mr. Cunningham:

I am not able to attend the workshop on sectors in Portland next week, but I do want to give you my opinion on sector management.

I am the owner/operator of a 60' groundfish boat and a member of the Sustainable Harvest Sector.

Sector management has been a big change, and it hasn't been easy, but we are figuring out how to make it work. We have a pretty big sector, so we are able to spread the cost of management around.

I don't know how we will continue to make it work though if we are forced to pay observers. The Council must change the regulations so that we are not responsible for this unreasonable cost.

The rolling closures make it real hard for small and mid size boats to catch all of our allocation. For example, there are a lot of dabs in those closures, but we can't get at them when they are there. It would be real helpful, if the Council could get rid of those closures, and get rid of the Western Gulf of Maine closed area while you are at it.

I heard some people talking about things like set-asides and restrictions on trading, and I think those are lousy ideas. No one has enough allocation so there is really nothing to give away. Besides, I worked for my allocation, so I don't think it is fair for someone else to get allocation for free. Right now I have to compete with boats that get cheap quota from the Maine permit bank, and that is not fair. I don't want any restrictions on trading. That makes no sense at all.

Please get this monitoring thing straightened out right away, and let us fish in the closed areas.

Thanks

Ken Hunt  
F/V Cavalier  
Phippsburg, ME