

Point Judith / Southern New England Trawl Sector
Chris Brown
35 Erica Court West Kingston, RI 02892

April 30, 2007

Paul J. Howard
Executive Director
New England Fisheries Management Council
50 Water St. Mill #2
Newburyport, MA 01950

Dear Paul,

The attached document is the outline of the Environmental Assessment for the Point Judith / Southern New England Trawl Sector.

Sincerely,

Chris Brown

Point Judith / Southern New England Trawl Sector
Chris Brown
35 Erica Court West Kingston, RI 02892

Paul J. Howard
Executive Director
New England Fisheries Management Council
50 Water St. Mill #2
Newburyport, MA 01950

Re:

Submission of the Point Judith / Southern New England Trawl Sector Allocation Proposal

Captain Howard,

April 30, 2007

Please accept this correspondence as notification of our intent to participate directly as a stakeholder in the Sector Allocation process the New England Fisheries Management (NEFMC) council will be deliberating during the next management action to adjust or amend the Northeast multispecies FMP.

Upon careful review of the Sector Allocation provisions in section 648.87, we find this provision to be extremely vulnerable to a myriad of potential interpretations and applications that may result in severe and irreparable reallocation of the fishery. We are especially disheartened by the apparent direction the Amendment 16 process has recently taken.

For these and other reasons, we feel compelled to request the NEFMC consideration of our formation of a Sector. However, this request is primarily for the purpose of securing a placeholder as a directly effected stakeholder in future sector allocation baseline discussions.

At this time the allocation we will be requesting is consistent with the current regulations contained in 648.87 and the sector allocation / operations methodology proposed by the two existing sectors and approved by the NEFMC and NMFS.

The Point Judith / Southern New England Trawl sector will interact with monkfish and skates which are currently managed with Days at Sea. Our sector will be requesting an allocation of Southern New England yellowtail flounder and will utilize Days at Sea to account for our interaction with the other stocks managed under the Northeast multispecies plan as well as monkfish and skates.

We anticipate initial enrollment to be in the range of 10 to 60 vessels that have individual DAS limited access multispecies permits with A DAS qualified through Amendment 13. These vessels are small and medium sized trawlers that fish primarily in Southern New England.

Under existing regulations we would anticipate the aggregate total of the individual quota shares of the members to produce an allocation of Southern New England yellowtail flounder of between 7% and 20% of the TAC of each stock. When the allocation of either stock is reached, all members of the sector would cease fishing for the remainder of the fishing year.

Consistent with treatment of the current sector proposals, our sector will be seeking exemptions from the SNE differential counting and SNE yellowtail trip limit.

We've included a sample EA that we acknowledge will require extensive work and analysis that will be the burden of the sector to complete. We also understand an Operations Plan and Contractual documentation must be submitted at least 3 months and preferably 4 months prior to the end of the 2007 fishing year in order to be operational in fishing year 2008.

We anticipate the NEFMC will have to resolve the numerous, complicated and controversial issues surrounding the Sector allocation process by further developing the currently vague and arguably incomplete Sector regulations.

It seems it would be a futile exercise to attempt to conduct a valid economic analysis absent a comprehensive sector policy or a greater understanding of the global allocation implications of approving sectors by using IFQ's based purely upon catch history.

However, we do see the potential benefits of "sector management" such as consolidated reporting, accountability and stewardship qualities that may come from this approach. It is the "sector allocation" method that poses the greatest potential setbacks. Managing a multispecies fishery under IFQs / ITQs has proven an almost insurmountable task throughout the world. The threat of foreign investment, corporate ownership and loss of fishing communities is real, present and near guaranteed if this careless shift to species specific quota shares is allowed to take place here in New England.

We believe that the council should first develop a better, fairer, more fungible currency in a fully transparent and comprehensive allocation process for all individual permit holders. We could envision this being followed by the natural formation of sectors or management co-operatives to share resources, ease administrative burdens and promote stewardship and accountability.

Absent such an effort, we feel compelled to submit this request to be considered along with any sector proposals to be considered in the near future.

Respectfully submitted,

Chris Brown