

# NEFMC Council Meeting

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Scallop Vessel Incidental Catch of YTF  
Discussion Materials

for

Thursday, November 20

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**Discussion Paper – Proposals for Yellowtail Flounder and the Scallop Fishery  
November 6, 2008**

**PURPOSE OF THIS DISCUSSION PAPER**

The purpose of this discussion paper is to:

- state the problems caused by yellowtail flounder incidental catch, and limits on such catch, in the scallop fishery
- provide management goals and objectives to resolve the problems
- and outline and discuss alternatives to achieve those objectives.

At the September, 2008 Council meeting, the Council directed the staff to prepare this paper in response to a request and set of proposals presented by the Associated Fisheries of Maine.

**PROBLEMS BEING ADDRESSED – NEED FOR ACTION:**

**1. Scallop Access Areas Incidental Catch**

Scallop dredge vessels have an incidental catch of yellowtail flounder that up to now, in the case of the scallop access areas, presents an impediment to their ability to harvest the allowable amount of scallops for those areas, especially as the yellowtail flounder TAC has been reduced. Scallop Framework Adjustment 16/Multispecies Framework 39, implemented November 2, 2004, limited the scallop access area fishery to 10% of the yellowtail flounder TACs for Georges Bank and Southern New England yellowtail flounder stocks. This yellowtail TAC is for access area programs only; incidental catch from scallop trips in open areas is not part of the 10% limit. Limited access scallop vessels are permitted to land 1,000 pounds per trip of yellowtail flounder on access area trips; general category scallop vessels are not. All discards and catch from both fleets, limited access and general category vessels on access area trips, are counted against the access area yellowtail flounder incidental catch TAC.

Monitoring of the catch with respect to the yellowtail TAC is based on an extrapolation of the discards and catch on observed trips to scallop access areas (portions of Closed Area I, Closed Area II, and Nantucket Lightship). When the yellowtail TAC is projected to be reached, the access area closes to all scallop fishing, regardless of whether all allocated trips have been taken. In the event of a premature closure, limited access vessels are awarded open area DAS as compensation for the area closing. For example, in 2008 after the Nantucket Lightship closed area closed, limited access vessels could fish 7.7 DAS in open areas if they were not able to take their allocated trip in that area.

In 2006 and 2008 scallop vessels reached or exceeded the yellowtail flounder limit before all vessels could take their allotted trips in the access areas, see Table 1, Attachment 1. When the access areas closed prematurely, vessels that had not taken their allotted trip(s) were provided compensation DAS for use in the open areas. Catch rates of scallops in open areas are usually not as high as access areas, so trips are not equivalent, but it should not be assumed that the catch and revenue was completely lost when the access areas closed, nor that vessels that did not take their access area trips were able to fully recoup what they otherwise would have caught.

The problem caused by the yellowtail flounder TAC will likely be exacerbated in the future by two other factors, namely, the GARM III assessment and recommendations for other groundfish species, and the increasing average size of yellowtail flounder. In the first case, the TACs for other incidentally caught species in the access area programs, particularly SNE/MA winter flounder, will likely be reduced significantly, implying that other incidental catch species may be more limiting on the access area

fisheries than yellowtail flounder. In the second case, according to the assessment, the average size of yellowtail flounder is increasing, suggesting that the overall weight of catch for a given number of fish might increase, which implies that the TAC could be reached sooner.

**The immediate problem before the Council, therefore, is to reduce or eliminate the impediment to achieving the optimum yield from the scallop fishery caused by the fishery's incidental catch of yellowtail flounder, and, perhaps, other species.**

## **2. Impact of ACLs**

On August 28, 2008, the Associated Fisheries of Maine (AFM) submitted a letter to the Council, raising the issue of yellowtail flounder limits impacting the scallop fishery (Attachment 2). While the letter focused on access to groundfish closed areas, the staff notes that the implementation of ACLs in the groundfish plan may raise similar issues outside the access areas. Amendment 16 proposes that ACLs for the three yellowtail flounder stocks will be divided into specific sub-components for the scallop fishery. If adopted, all scallop fishing activity could be subject to limitations as a result of exceeding these ACLs. Exact amounts have not been determined (Amendment 16 currently suggests the amounts should not be a fixed percentage, but should be determined in concert with the scallop area access program), and specific accountability measures have not been established. It is possible that limits on yellowtail flounder catches may restrict scallop fishing everywhere under the ACL/AM provisions.

### **GOALS AND OBJECTIVES OF THE PROPOSALS – PURPOSE OF THE ACTION:**

If and when the Council agrees to proceed with the development of management measures to address the problems outlined above, it would be appropriate first to state its objectives. The purpose of stating the objectives first is to provide the conceptual framework for developing and evaluating different management alternatives. The Council staff suggests, for Council consideration, that the objectives could be stated as follows:

- maximize scallop yield while rebuilding groundfish stocks, particularly yellowtail flounder
- mitigate the effect of the yellowtail flounder catch limit, or other existing or future multispecies catch limits, on harvesting the total allowable catch of scallops within portions of the groundfish closed areas
- mitigate the impact of any such changes on multispecies vessels currently involved in the yellowtail flounder fishery
- Resolve similar problems that may occur as a result of the implementation of ACLs in scallop, groundfish and other fisheries

The staff notes that the objectives above are only a suggestion, and that the Council may modify, remove or replace any of the language.

### **Proposals – Range of alternatives for consideration**

#### **Associated Fisheries of Maine Proposals**

As noted above, the Associated Fisheries of Maine (AFM) letter outlined a problem and offered three conceptual solutions for Council consideration. The proposals are based on the assumption that groundfish vessels will be allocated “annual catch entitlements” (ACE) that they can potentially transfer to scallop vessels to remedy the problem presented in the letter. In fact, Amendment 16 proposals do not allocate ACE as a quantity of fish to individual permits. Amendment 16 defines ACE as: *a sector's share of a stock, in weight, based on the aggregated Potential Sector Contributions of each permit in the sector. The nuance is that ACE does not exist for individual permits; it only exists for sectors.* In any case, under all three AFM proposals, the Council will need to clarify the impact of such transfers on the existing 10% yellowtail TAC allocation to scallop vessels. For example, if some scallop vessels do not avail themselves

of one of the opportunities for obtaining yellowtail ACE from groundfish vessels (under any of the three proposals), would they still be operating under the same 10% cap, or would the cap be adjusted for the smaller number of vessels than when the cap was established?

Another overarching concern is consistency with the mandate of the Magnuson-Stevens Act to minimize bycatch to the extent practicable. Since all three of the proposals involve ways to increase the allowable yellowtail flounder *catch* on scallop vessels, and since those vessels are limited to *landing* a small amount of yellowtail, these proposals would likely result in increased discards. The Council may, on the other hand, consider that achieving optimum yield from the scallop fishery outweighs the increase in bycatch that would result, and, if so, should explicitly state its rationale.

The AFM alternatives are described and discussed below. Where possible, the pros and cons of each are identified, but since the proposals are mostly conceptual, and lacking specifics, it is difficult to make detailed evaluation or comparison. Most of the discussion, therefore, is an attempt to identify issues or questions that would need to be resolved as the concepts are developed into more detailed management alternatives.

**1) Allow scallop permit holders to absorb groundfish permits that are allocated yellowtail ACE. All other ACE associated with that groundfish permit could not be utilized, thereby reducing effort on other groundfish stocks.** Discussion Points: The term “absorb” needs to be better defined. It could be interpreted as either purchase or lease. The proposal does not say whether other permits associated with the groundfish permit would also be absorbed, but suggests that those permits could only be used as a way to harvest yellowtail flounder, and would potentially reduce effort on all other groundfish stocks. Current regulations do not allow for permit splitting, so either all other permits would be eliminated, or the Council would need to provide for permit splitting in the Multispecies FMP. Under the current proposals in Amendment 16, vessels are provided with a “potential sector contribution” value that is not converted into pounds of fish until such vessel joins a sector. Thus, it does not appear that the AFM proposal is consistent with the ACE concept under consideration in Amendment 16, since permits are not automatically assigned individual weights of yellowtail without being a sector participant. Furthermore, if this approach is adopted, it could be considered the transfer of an individual quota share of yellowtail flounder, and, as such, would trigger all of the LAPP requirements of the Magnuson-Stevens Act, including a referendum and cost recovery program, for the groundfish, and, perhaps, the scallop fisheries.

**2) Allow scallop permit holders to lease groundfish days at sea (DAS) from permit holders that are allocated yellowtail ACE. The scallop vessel would then fish on a joint groundfish/scallop day at sea. This option would also reduce effort on other groundfish stocks.** Discussion points: The proposal as written implies, but does not state whether the scallop vessel fishing on a combination DAS would be prohibited from landing other groundfish species. If this is the Council’s intent, it would need to state it in the alternative. If a vessel holding a groundfish permit that leases its DAS also holds permits in other fisheries, that vessel could continue fishing in those other fisheries. If the vessel is historically active in those other fisheries, this proposal would enable that vessel to continue to generate income from those fisheries and not cause an effort increase in those other fisheries. On the other hand, if the vessel has not been active in those other fisheries, but becomes so after leasing out its groundfish DAS, there would be potentially negative impacts resulting from the shift in effort.

There is also the question of whether a vessel that does not have a groundfish limited access permit can fish on a groundfish DAS; although, if the Council chooses to develop this alternative further, it could develop a mechanism that would enable this to take place under the specific circumstances. The NMFS DAS tracking program would also have to accommodate these special scallop/groundfish DAS. At this point, there are no limits on the amount of DAS that could be transferred, and the Council may want to

consider whether limits are appropriate. The Council would also have to establish a mechanism for associating the transferred DAS with specific yellowtail flounder ACE (or, more correctly, potential sector equivalent). In other words, if a groundfish vessel leases a portion of its DAS, would its ability to catch yellowtail flounder, or other groundfish species, be reduced proportionally or by some other formula? This proposal might not have the same IQ issues as the one above, since the transfer would be in DAS rather than pounds of fish.

**3) Allow scallop permit holders to join a groundfish sector for the purpose of utilizing yellowtail ACE. This option does not provide the extra benefit of reduced effort on groundfish, but it may provide economic relief to groundfish permit holders.** Discussion Points: Under the current Sector Policy adopted by the Council, vessels must have a limited access permit in the fishery in which it is joining a sector. (*Each FMP may adopt a sector program through a plan amendment to enable limited access permit holders in the respective fishery to form sectors.*) If the Council chooses to pursue this approach as an alternative, it will have to modify the Sector Policy, or otherwise provide justification for and limitations on allowing sector membership by vessels that do not hold limited access permits in the fishery in which the sector is formed. One such change is contemplated in Amendment 16, which includes an alternative that would allow one vessel to possess a limited access multispecies and scallop permit at the same time. If adopted, a scallop vessel could acquire a limited access multispecies permit and then join a groundfish sector. While this concept appears to be the least complicated of the three, operating much the same way as existing and already proposed sectors do, it would require some changes to the Amendment 16 sector management program. At present, Amendment 16 proposes that groundfish catches by scallop dredge vessels be counted against the scallop fishery ACL rather than a sector; this provision was designed primarily for General Category scallop vessels who can already join groundfish sectors. This provision would need to be revisited if the decision is made to use sector ACE to support scallop fishing activity. Some of the issues that would need to be addressed include:

- How does this program affect the 10% yellowtail TAC allocation to the scallop fleet – should the scallop fishery yellowtail flounder ACL be reduced if scallop vessels join groundfish sectors and are allowed to apply yellowtail flounder catches against the sector’s ACE?
- If scallop permit holders are in a groundfish sector, should their yellowtail flounder catch count against the scallop fishery yellowtail flounder ACL or the sector’s ACE?
- If a scallop vessel is in a sector that catches its yellowtail flounder ACE, is the scallop vessel prohibited from fishing for scallops for the rest of the fishing year?
- Can a scallop vessel in a groundfish sector fish under both the access area incidental catch TAC and its sector ACE, or just one or the other?
- If the scallop access area incidental catch TAC is caught, but a scallop vessel is in a groundfish sector that still has yellowtail flounder ACE, can the scallop vessel enter the access area and apply yellowtail flounder catches against the sector’s ACE? If this is allowed, what cap (if any) will be placed on scallop catches of yellowtail flounder from the closed areas?

Whatever calculation is made, with respect to adjusting the TAC for the common pool (vessels not participating in sectors), it would have to be updated annually to account for changing sector participating by scallop vessels under this proposal.

### **Other alternatives –**

To aid the Council in considering the full range of alternatives that could be considered to address the problems outlined in the problem statement, the staff compiled the following list, but notes that none is a perfect solution, with each having its own issues.

**1. Gear solutions** – Over the past decade, substantial research has been conducted to minimize bycatch in scallop dredges. This research led to the requirement of a minimum of 10” twine top for all scallop dredge vessels in all areas (Amendment 10, 69 FR 35194). Based on the large body of research conducted to date, any further increase in mesh size would result in significant and unacceptable reductions in scallop catch rates. There is research currently being conducted on other modifications to dredge gear primarily to reduce turtle bycatch, and preliminary results indicate that additional gear modifications may reduce finfish bycatch as well. However, the final results from this research are not yet complete, so for the time being gear solutions may be exhausted.

**2. Increase yellowtail TAC for access area fisheries** – Under this alternative the Council would raise the allowance or allocation from 10% of the yellowtail flounder TAC to some other (to be determined) level. The consequences of this approach would be that yellowtail flounder catch by scallopers would increase, and the amount of yellowtail flounder available to be landed by groundfish vessels would be reduced. Currently, limited access vessels are permitted to retain up to 1,000 pounds of yellowtail flounder per access area trip. Limited access scallop vessels can retain 300 lbs. of regulated groundfish per trip outside the access areas. General category vessels are not permitted to retain groundfish when fishing with a dredge. The bycatch issue could be resolved by requiring scallop dredge vessels to land all legal size yellowtail flounder incidental catch.

**3. Enable scallop vessels to form sectors for the sole purpose of pooling allowable yellowtail catch** – This approach would require the Scallop FMP to allocate the yellowtail flounder incidental catch TAC to individual scallop vessels. Previous discussions regarding scallop sector formation focused on allowing member vessels to pool their allowable scallop catch in order to achieve some economic efficiency. The Council decided not to develop these proposals in Amendment 15 out of concerns that such measures could result in unacceptable levels of consolidation in the industry. If, however, vessels could organize into sectors for the sole purpose of managing their yellowtail bycatch those vessels could cooperate to avoid yellowtail, and then use their pooled yellowtail allocation to cover unavoidable incidents of bycatch. Given the relatively small quantity of yellowtail flounder that would be allocated to individual vessels, this proposal would require extensive monitoring, potentially approaching 100% observer coverage.

**4. Make voluntary measures required.** Following the 2006 closures the industry provided “best fishing practice” handouts to all scallop vessels about how to reduce or avoid YT bycatch. The handout recommended several specific fishing behavior changes vessels could make to potentially reduce YT bycatch (i.e. reduce the length of tow times, move fishing location if YT is encountered etc.). All the suggestions could potentially reduce YT bycatch, but they were voluntary. It could be possible for the Council to consider including some of these ideas within the management program, but enforcing these measures would be difficult. Furthermore, in recent years each vessel has only been allocated one access area trip per area on GB, so the incentive to reduce bycatch is less since that vessel will not need to return to that area (that is, the subsequent closure will affect someone else, not the vessels who caught the yellowtail flounder causing the limit to be reached).

**5. Allocate access area trips differently.** One option could be change the way we allocate scallop access on GB. Currently vessels are allocated access based on the amount of available scallop yield in the area. The approach could be modified so that vessels are allocated access based on the amount of scallop effort that is expected to catch the available YT TAC. The system today impacts vessels that get “shut out” of an area more than the vessels that take access area trips at the beginning of an opening. By limiting the level of access to match the amount of YT available, this option would distribute the impacts more evenly

between the fleet since the “optimal” yield from these access areas is sometimes constrained by the YT TAC.

Under this option the fishery would be allocated a certain level of access that would also catch an expected level of YT catch. A bycatch rate (YT catch/scallop catch) could be determined from previous years and combined with projections of YT and scallop resources. That ratio could then be applied to the total available YT TAC. For example, in NL in 2008 the bycatch ratio of YT to scallop catch was approximately 0.013 (63,000 lbs. of YT to 4.7 million pounds of scallop catch when the area was closed). If that ratio is applied to the available YT TAC in the future, i.e. 67,000 pounds of YT would equate to 5.2 million pounds of scallop catch. Instead of allocating one 18,000 pound trip to each vessel of the 325 full-time equivalent vessels (total of 5.9 million pounds), and potentially closing the area when the YT TAC is reached, each vessel could be allocated a portion of the 5.2 million pounds of “available scallop catch” based on the estimated ratio of YT catch to scallop catch. In this example, each of the 325 full-time equivalent vessels would be allocated one trip with a 16,000 pound possession limit ( $16,000 \times 325 = 5.2$  million pounds).

While YT bycatch rates differ by year and area within each access area, the framework could consider first how much YT is available and then only allocate scallop effort up to that level. Similar problems still exist in terms of an area closing because the projected ratio could be wrong and the area may close regardless, but this option may have a greater potential of providing access to each vessel because the allocation of scallop catch is more closely linked to the amount of YT TAC available.

Another option that would allocate trips in the area differently could be in terms of how trips are allocated throughout the year. Currently, access areas on GB open on June 15, and remain open through the rest of the fishing year (Feb 28/29 the following year) or until the YT TAC is reached, whichever happens first. One way to reduce derby affects and potentially keep the area open longer would be to allocate trips by month, or week if necessary. A fleetwide restriction on the number of trips that can be taken by month or week could spread effort out and reduce bycatch levels so each vessel is able to take a trip. However, scallop meat weights do vary by season, so there will be more desirable times to access these areas from the scallop fishery perspective, i.e. most vessels will want to fish in the summer when meat weights are higher and weather is better.

**6. Increased observer coverage** – Some members of the scallop industry have argued that the method for observing and monitoring YT bycatch may be leading to closures earlier than necessary (i.e. if observed trips with high bycatch levels (outliers) overly influence the estimate when expanded to the full fishery). It is possible that if more trips are observed then the estimate would be more robust. The Council recently requested that the Center investigate how the YT TAC is currently being observed and monitored to assess if the current level of coverage is sufficient. If the monitoring of yellowtail flounder incidental catch is inaccurate, then increased observer coverage may improve the estimates. If the current methodology results in estimates that are too large, improving the accuracy of the estimates would allow for more trips, with no other changes to the rules. On the other hand, if the current estimates are too low, improving the accuracy would result in earlier closures, and the current problem would worsen.

**7. Do Nothing (no action alternative)** – This approach would probably result in some continued foregone scallop yield in the near term, until yellowtail flounder rebuild. As the overall yellowtail flounder TAC increases, along with stock rebuilding, the poundage available under the existing 10% allocation to the access area programs will increase proportionally, possibly reducing the frequency of early closures. The yellowtail flounder TACs should be higher than recent values by 2010, when Amendment 16 is implemented (see Table 2). What is not clear is whether discard rates will increase

proportional to stock increases. If that occurs, then the problem may not lessen with increased allowable catches.

**Table 2 – Past TTAC/TAC and estimated future TTAC/TAC for GB and SNE/MA yellowtail flounder. Future values are based on median catch projected using the rebuilding mortality rate. For GB yellowtail flounder, future value has been reduced by 25 percent to account for Canadian quota share and actual values may differ.**

	<b>Fishing Year</b>	<b>GB YTF (U.S. Only)</b>	<b>SNE/MA YTF</b>
TTAC/TAC	2008	1,868	312
	2009	1,617	272
Median Catch	2010	2,075	489
	2011	2,567	673
	2012	2,977	989
	2013	3,341	1,390

**Recommendations and Implementation Matters**

The staff is not recommending any specific alternative at this time. It notes, however, that each alternative would have a different development and implementation timeline, given the range of issues and analysis requirements. Any alternative that requires a modification of groundfish regulations would not be implemented until 2010, at the earliest, if it could be inserted into Amendment 16. Staff would require guidance from NMFS or NOAA GC as to whether the alternatives could be implemented by a framework adjustment or would require an amendment, and which FMPs need to be modified. If an alternative requires a groundfish amendment, and the Council wants to adopt it in Amendment 16, it will need to make that decision at this meeting (November Council meeting). Some alternatives would depend on the decisions made in Amendment 16, such as ACL/AMs or sector rules, and would be contingent upon those alternatives being approved by NMFS. Amendment 15 under the Scallop FMP is currently under development as well. It is possible some of these ideas could be included in that action, but the Council is scheduled to approve the final range of alternatives for analysis in February 2009.



Table 1 is a summary of the scallop effort and available YT incidental catch TACs for scallop access areas in 2006-2008. Scallop vessels were first granted access into closed areas on Georges Bank in 1999. Since that time the access areas have closed a total of three times before all allocated trips could be taken due to the YT incidental catch TAC being caught. Both access areas in 2006 closed before the end of the year (NL and CA2) and NL closed in 2008.

In general, each access area trip allocation has the potential to yield approximately 6 million pounds if all trips are taken and all vessels land their full possession limit. The amount of YT available has varied by year as well as the bycatch rates. For example, in 2008 more YT TAC was available, but the bycatch rate was about double (0.006 in 2006 compared to 0.013 in 2008), so even though the scallop fishery was allocated the same amount of effort in that area each year, NL closed in 2008 with about 65 full-time trips not being taken. In addition, the general category fishery was allocated 667 trips in that area, and took 593 before the area closed, leaving 74 trips unused. FW19 estimated that the bycatch rates in NL would be similar to 2006 and 2007, thus did not expect the area to close before all trips could be taken because the YT TAC increased by about 20,000 pounds in 2008 compared to 2007. The SNE YT TAC was actually exceeded in 2006 in NL when an estimated YT catch of 55,458 pounds were caught, 176% of the allocated YT TAC. In addition, the TAC was slightly exceeded in CA2 in 2006 as well before the area was closed.

**Table 1 – Summary of scallop effort and YT incidental catch TAC allocations, catch and trips taken in the scallop access area program on GB in 2006-2008**

		2008	2007		2006	
		NL	NL	CA1	NL	CA2
<b>Allocations</b>	# of trips allocated (FT)	1	1	1	2	3
	# of total LA trips*	325	325	325	650	975
	Allocated YT incidental TAC	67,409	46,018	194,442	31,544	447,230
	# GC trips allocated	667	394	216	577	865
<b>Catch</b>	LA Scallop Catch	4,684,026	5,867,448	5,634,427	8,892,000	14,292,000
	Estimated YT catch	63,193	34,778	53,888	55,458	462,312
	Ratio of YT/scallop catch	0.013	0.006	0.010	0.006	0.032
	estimated % YT quota caught	93%	76%	28%	176%	103%
<b>Trips</b>	# of LA trips taken**	282	336	351	508	814
	# of FT 18K trips	260	326	313	494	794
	# of trips not taken	65	N/A	N/A	138	154
	# GC trips taken	593	354	155	614	2
	# GC trips left	74	N/A	N/A	-37	N/A
<b>Date of closure</b>		<b>8/4/2008</b> Open 50 days	N/A	N/A	<b>7/20/2006</b> Open 35 days	<b>9/6/2006</b> Open 83 days

\* 325 is not the actual number of permitted vessels each year. That is the value that was used in FW19 to estimate the number of full-time equivalent vessels for analysis purposes.

\*\* Includes compensation trips, so more accurate to compare number of FT equivalent 18K trips

**ASSOCIATED FISHERIES OF MAINE**

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August 28, 2008

Mr. John Pappalardo, Chair  
New England Fishery Management Council  
50 Water Street  
Newburyport, MA 01950

Dear John:

The recommendations of GARM III will have a profound negative impact on the groundfish fishery, and with respect to yellowtail flounder the recommendations will also negatively impact the scallop fishery.

I am writing to propose potential mechanisms that may provide some relief to both fisheries.

Amendment 16 will allocate "annual catch entitlement" (ACE) to groundfish permit holders. We believe the Council can and should allow scallop permit holders to utilize yellowtail ACE allocated to groundfish permits for the purpose of managing bycatch in the scallop fishery.

We offer three broad concepts for Council consideration:

- 1) Allow scallop permit holders to absorb groundfish permits that are allocated yellowtail ACE. All other ACE associated with that groundfish permit could not be utilized, thereby reducing effort on other groundfish stocks.
- 2) Allow scallop permit holders to lease groundfish days at sea from permit holders that are allocated yellowtail ACE. The scallop vessel would then fish on a joint groundfish/scallop day at sea. This option would also reduce effort on other groundfish stocks.
- 3) Allow scallop permit holders to join a groundfish sector for the purpose of utilizing yellowtail ACE. This option does not provide the extra benefit of reduced effort on groundfish, but it may provide economic relief to groundfish permit holders.

We understand that there are pros and cons for each of these concepts, and we have deliberately left out many details. We hope that the Council will agree that these concepts have merit, and will also agree to find the most expedient regulatory vehicle to work out the necessary details. This will take some creative thinking and a strong willingness to achieve a solution.

I am prepared to speak to this issue on Thursday, September 4 under the agenda item "Open Period for Public Comment".

As always, we appreciate your consideration of our views.

Sincerely,

*M. Raymond*

Maggie Raymond

*Associated Fisheries of Maine is a trade association of fishing and fishing dependent businesses. Membership includes harvesters, processors, fuel/gear/ice dealers, marine insurers and lenders, and other public and private individuals and businesses with an interest in commercial fishing.*

