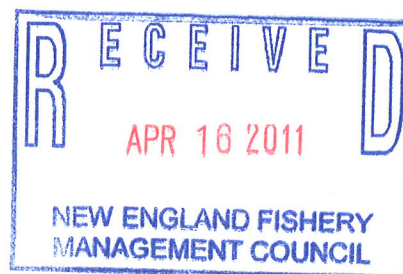


Additional Correspondence

13a

From: joseph huckemeyer <jhuck1414@me.com>
Date: April 16, 2011 8:51:43 PM EDT
To: FrancesFlt@aol.com
Subject: Block Island Cod



Groundfish Committee Members:

I am writing the committee with some information regarding the winter Block Island cod fishery, and to hopefully prevent an unnecessary restrictive bag limit. This fishery is relatively new. There is strong evidence that these fish did not originate in the Gulf of Maine as some have suggested. Block Island has seen a strong fishery for four or five years now, and it follows closely behind the influx of a large amount of bait into the area. The arrival of the fish each year follows shortly after the departure of a similar body of fish departs Nantucket Shoals. There is also a strong correlation between the parasite count of Block Island fish and the fish caught on Nantucket Shoals. These parasite numbers are far less than what are found in Gulf of Maine cod. A number of tags also have been recovered (four by myself) and they originated off Chatham, Middle Rip and Fishing Rip.

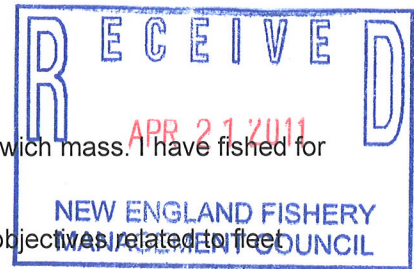
I have heard concerns that the school of cod off Block Island needs protection because it may be a spawning area similar to the Whaleback area up north. Although a few fish at the beginning of January are in spawning condition this is short lived and in small numbers. The fishery is comprised of several year classes with the majority of the fish under eight pounds, a fish over twenty pounds is a rarity. Other than cod a few pollack were caught, with maybe twenty in the entire fleet. It also seems the extent of effort directed onto these fish is misunderstood. This year saw eight full time partyboats, with four of them limiting their capacity to between 28 and 36 people. There were four part time partyboats sailing one or maybe two times a week and five charterboats fishing up to a few days a week. Commercially there was one tub trawler, one gill netter and up to ten dragners. Keep in mind winter weather also greatly reduces the number of days the fleet sailed and even less days for the smaller vessels. Comparatively, a few years ago during the same period, when the fish stayed in Nantucket Shoals, effort was represented by four partyboats, four charterboats, fifteen tub trawlers and twenty dragners.

This winter the entire fleet made a concerted effort to limit landings on good fishing days by heading home early. Not having a rigid bag limit gave the boats the flexibility to make sure the weaker fisherman caught what they needed at the same time controlling the better fisherman. These self imposed effort controls can be read about on a number of online discussion boards which at times appear to be at our own peril.

In conclusion we must responsibly and factually evaluate any actions that may be considered for this fishery. I do not know of any data that shows that we need a reduction, except that some boats who do not participate in the Block Island fishery want a 10 fish bag limit, similar to the Gulf of Maine. As some of you may remember that was a trade off for access to the Western Gulf of Maine closed area. If anything the party charter portion of this fishery is down 20 to 25% in the number of anglers over last year.

Thank you for your time. I will be at the groundfish committee meeting on Monday if any members have questions.

Joseph Huckemeyer
 Helen H Offshore Fishing



My name is William Chaprales and I am a commercial fishermen out of sandwich mass. I have fished for 40 years.

- * Urge Council not to postpone discussion to address groundfish goals and objectives related to fleet diversity, consolidation, and community protections.
- * Postponing discussion will not help managers to achieve their own goals and objectives which are currently not being met.
- * **There are many options that should be discussed, researched, and brought back to the industry for a meaningful discussion on ways to achieve the stated goals and objectives.**

- * Many problems currently exist.
- * Consolidation is hurting communities and driving the distribution of quota in one direction: towards the large-scale.
- * Lack of protections is leading us toward a less diverse fleet which hurts infrastructure as well as access to local fish.
- * The fishery is becoming unaffordable for independent fishermen.
- * There were inherent inequities with the initial allocation that have not been addressed.
- * There is a high concentration of effort happening in certain areas where fish are spawning.

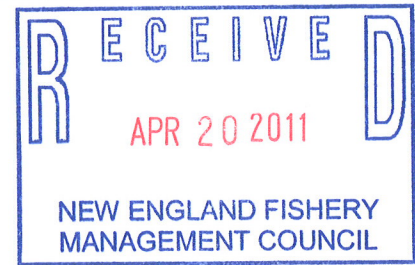
* In June 2010 the Council voted on these goals and objectives: 1. Maintain inshore and offshore fleets, 2. Maintain a diverse groundfish fishery, including different gear types, vessels sizes, geographic locations, and levels of participation. 3. Maintain a balance in the geographic distribution of landings to protect fishing communities and the infrastructure they provide and 4. Prohibit any person from acquiring excessive access to the resource, in order to prevent extraction of disproportionate economic rents from other permit holders.

- * Right now these goals and objectives will not be met.
- * A management program that cannot meet its own goals and objectives must be addressed.
- * There are many possible ways to achieve the stated goals and objectives listed above.
- * Leasing Policies - Under Days at Sea baseline leasing policies protected fleet diversity as well as made leasing/buying more affordable. Now there exists no such tool. There needs to be a tool in place that serves the same purpose as baseline leasing.
- * Owner-Operator - Policies that increase the ability and opportunities for owner-operators to succeed in the fishery will help prevent excessive consolidation and lead to a more diverse fleet.
- * Initial Allocation - There exists inequities in the initial allocation that must be addressed. Tools such as quota-set aside programs can help to achieve the state goals above.

*Urge Council members not to delay this process.

Thank you,
Bill Chaprales f/v rueby
29 stonebridge lane marstons mills ma

From: Shareen Davis [shareendavis@gmail.com]
Sent: Wednesday, April 20, 2011 4:10 PM
To: Joan O'Leary
Subject: groundfish comment



To the New England Fisheries Management Council:

RE: Amendment to Address Fleet Diversity and Excessive Consolidation

My name is Shareen Davis and I have commercially fished out of Chatham I have fished for 30 years with my husband, father and brothers. I come from generations of groundfishermen fishing out of Chatham. My husband's family owns a commercial fishing dock in Stage Harbor that facilitates the fishing industry transient and local.

I urge the Council not to postpone discussion to address groundfish goals and objectives related to fleet diversity, consolidation, and community protections. Postponing discussion will not help managers to achieve their own goals and objectives which are currently not being met. There are many options that should be discussed, researched, and brought back to the industry for a meaningful discussion on ways to achieve the stated goals and objectives. So many problems exist. * Consolidation is hurting communities and driving the distribution of quota in one direction: towards the large-scale.

Lack of protections is leading us toward a less diverse fleet which hurts infrastructure as well as access to local fish. The fishery is becoming unaffordable for independent fishermen.

There were inherent inequities with the initial allocation that have not been addressed.

In June 2010 the Council voted on these goals and objectives: 1. Maintain inshore and offshore fleets, 2. Maintain a diverse groundfish fishery, including different gear types, vessels sizes, geographic locations, and levels of participation. 3. Maintain a balance in the geographic distribution of landings to protect fishing communities and the infrastructure they provide and 4. Prohibit any person from acquiring excessive access to the resource, in order to prevent extraction of disproportionate economic rents from other permit holders. Right now these goals and objectives will not be met. A management program that cannot meet its own goals and objectives must be addressed:

There are many possible ways to achieve the stated goals and objectives listed above.

Leasing Policies - Under Days at Sea baseline leasing policies protected fleet diversity as well as made leasing/buying more affordable. Now there exists no such tool. There needs to be a tool in place that serves the same purpose as baseline leasing.

Owner-Operator - Policies that increase the ability and opportunities for owner-operators to succeed in the fishery will help prevent excessive consolidation and lead to a more diverse fleet.

Initial Allocation - There exists inequities in the initial allocation that must be addressed. Tools such as quota-set aside programs can help to achieve the state goals above.

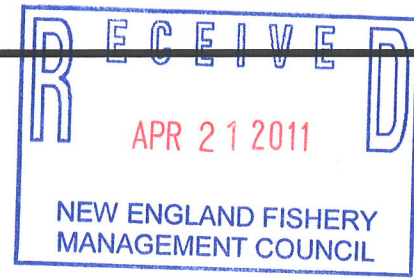
Council members should not to delay this process.

Thank you,

Shareen Davis
 Chatham Fisheries

Joan O'Leary

From: chucketzel@gmail.com
Sent: Thursday, April 21, 2011
To: Joan O'Leary
Subject: Accumulation limits regarding groundfish.



To Whom It May Concern,

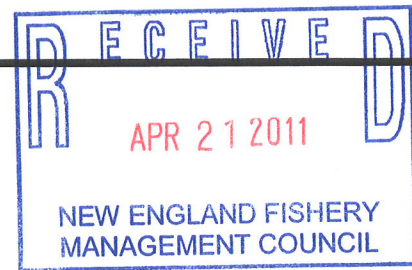
NEFMC must do more to preserve fleet diversity. I am in favor of restoring baselines limits to our ACE. I realize this will make the pool to lease from smaller, however it will preserve. Diversity. It is extremely hard call this new system fair. Fishers in harbors where infrastructure is better, fishers fishing more efficient gear and fishers with more efficient boats all have a huge advantage with a sector system. Please do more to keep a diverse fleet.

Thanks Chuck Etzel

Sent from my Verizon Wireless BlackBerry

Joan O'Leary

From: Kat Brown [kat-bgbrown@hotmail.com]
Sent: Thursday, April 21, 2011
To: Joan O'Leary
Subject: help



My name is BG Brown and I am a commercial fishermen out of Gloucester, Massachusetts. I am a second generation fisherman. My father fished for 30 years, but unfortunately downsized in his last 10 years and lost all his catch history when he sold his boat. I have commercial fishing on and off for 25 years and an owner operator for the last 6 years. I gillnet out of 31' boat all winter long and have improved my landings almost every year since I owned the boat. Last year I would have said that I was in a good position, plenty of gear and I finally finished overhauling my boat. Because of this new catch share system and the time frame used, my future in the industry is based on someone else's ability to catch fish. The years used to determine ones ACE doesn't accurately represent those currently fishing. If there is any hope for me and those in the same situation in today's fishing industry than the following problems need to be addressed.

- * Urge Council not to postpone discussion to address groundfish goals and objectives related to fleet diversity, consolidation, and community protections.
- * Postponing discussion will not help managers to achieve their own goals and objectives which are currently not being met.
- * **There are many options that should be discussed, researched, and brought back to the industry for a meaningful discussion on ways to achieve the stated goals and objectives.**
- * Consolidation is hurting communities and driving the distribution of quota in one direction: towards the large-scale.
- * Lack of protections is leading us toward a less diverse fleet which hurts infrastructure as well as access to local fish.
- * The fishery is becoming unaffordable for independent fishermen.
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- * In June 2010 the Council voted on these goals and objectives: **1. Maintain inshore and offshore fleets**, 2. Maintain a diverse groundfish fishery, including different gear types, vessels sizes, geographic locations, and levels of participation. 3. Maintain a balance in the geographic distribution of landings to protect fishing communities and the infrastructure they provide and 4. Prohibit any person from acquiring excessive access to the resource, in order to prevent extraction of disproportionate economic rents from other permit holders.

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- * There are many possible ways to achieve the stated goals and objectives listed above.
- * Leasing Policies - Under Days at Sea baseline leasing policies protected fleet diversity as well as made leasing/buying more affordable. Now there exists no such tool. There needs to be a tool in place that serves the same purpose as baseline leasing.
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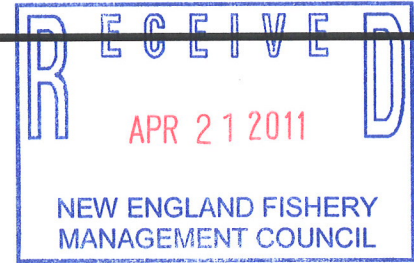
- *Urge Council members not to delay this process.

Thank you,

BG Brown

Joan O'Leary

From: Brian & Tracy Pearce [TPEARCE@MAINE.RR.COM]
Sent: Thursday, April 21, 2011
To: Joan O'Leary
Subject: amendment to address excessive consolidation



New England Fishery Management Council:

My name is Brian Pearce, I fish out of Portland, Maine and have been a full time Commerical Fisherman of New England Multispecies Groundfish for over 20 years. I'm writing today to ask that you take immediate action to support the goal of fleet diversity and put an end to consolidation of quota in the New England Groundfishery.

To support my request for immediate action against consolidation and in support of fleet diversity I will make four statements:

- Review the flow of quota for fishing year 2010 (quickly). If it is going from small to large vessels, the survival of the small boat fleet relies on immediate action to address the problem. Since the small boats generally fish summer months an immediate remedy to the current system is detrimental to the fate of this group of fishing operations
- Understand that if the supply is limited with the demand high larger well-funded corporations will prevail.
- The current catch share system fails to keep quota available in the small boat category because any permits baseline size can be transferred to another. I'm not suggesting that length and HP could work under catch shares but it did keep consolidation from happening under the Days at Sea management.
- Federally funded state permit bank have been set up to help address the issue but they have very little allocation. Rather than a federal bailout of the small boat fishery, corrective measures should be made to keep leasing affordable/available.

Please use your appointed authority to fix the negative economic impact that has been wrongly created in the catch share/sector management to the small boat fleet. I ask that you do not delay your attention to this matter.

Thank you,

Brian Pearce, F/V Gretchen Marie