

**Amendment 16 Public Comments Received Via
Email – Individual Comments**

From: "Ruth Clarke-Smith" <ruthruth75@hotmail.com>
To: <MultsAmendment16@noaa.gov>
Sent: Sunday, May 24, 2009 10:19 AM
Subject: RE: End Overfishing in New England

Now is the time to stop this from becoming a big problem for all New Englanders. Thanks for taking the time to read my response!

Ruth

> Date: Sun, 24 May 2009 14:15:11 +0000
> From: MultsAmendment16@noaa.gov
> Subject: Re: End Overfishing in New England
> To: ruthruth75@hotmail.com
>
> Thank you for your comment regarding the Amendment 16 Draft Environmental Impact Statement.

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----- Original Message -----

Subject: Council - Public Hearing Comment (Lisa Ann II)
Date: Wed, 27 May 2009 00:15:00 +0000 (UTC)
From: Jim Ford- F%2FV Lisa Ann II <captainjim1@comcast.net>
To: phoward@nefmc.org
CC: Pat.Kurkul@noaa.gov,
PLEASE FORWARD THE FOLLOWING LETTER TO THE REST OF THE COUNCIL.

Dear NEMFC Council,

I own the fishing vessel Lisa Ann II and am very concerned over my ability to support my family. Currently I fish year round, except when rolling closures pushed us too far out. My biggest concern is with the option that is based on length and HP of a boat. Everyone in the industry knows this is bogus and invalid information. I know people with 40 ft boats that catch a lot more fish than boats that have twice the size and twice the HP. Capacity does not determine how much fish can be caught, the expertise of the captain and the gear fished is what determines how much can be caught. For example, there are boats with Detroit 671 engines and their permits state they have 671 HP, but this is not accurate because 671 is a model number not the amount of HP generated. This also applies to boats with a Detroit 1271. I have a 3406 CAT, does this mean I qualify to have my permit state I have 3,406 HP? Even if you do look at HP, you should also look at the gear ratio. For example, my boat has low horse power, but because I have a 7 to 1 gear ratio and a 60 inch nozzle it puts out more torque than most most 60- 80 ft boats and my boat is only 56 foot. There is no basis for HP in any equation other than helping boats with no history.

Over the last 15 years we have had many reductions and changes in the groundfish industry and regulations and as a result fisherman had to make sacrifices and hard choices. Some chose to stick with the groundfish industry and work with the regulations to continue groundfishing. By choosing to stick with the groundfish industry many fishermen were required to purchase multiple permits in order to keep fishing. Others, on the other hand, made the choice to fish other species, such as monk fish, slime eels, whiting, squid, and scallops, not because they couldn't afford groundfish permits, but because they saw it offered more revenue without spending money on permits. Everybody made a choice based on what they felt was appropriate for their situation at the time. For those fisherman that stuck with catching flounders they will lose out on catching cod with the new regulations just as those fisherman that stuck with fishing cod will lose out on catching flounders with the new regulations. As the saying goes, "you can't have your cake and eat it too". If you left the industry unfortunately it comes with consequences and you shouldn't be able to have it all just because it looks like things are turning profitable again. Personally I will lose out on the permits I bought and leased to myself, but again, that was a choice I made at the time and I must live with those decisions

I hope the council will vote for the 5 year straight history. As any scientist will tell you, you should base your decisions on the "best available" data. To use data that is 13 years old would be a huge mistake. Accurate data was not kept at that time, (as most people are just realizing with the landing history that was provided), and the amount of fish has changed over that long period of time. If we want to do what is right for the fishing industry today, we should be using current data. I was an advisor to ACCSP and personally know that older data for commercial and recreational fishing is not valid because it was not reported accurately and recreational data was inputted with MRFSS, which is a telephone survey of fish caught. With the new laws and reporting systems (SAFIS) I believe the recent data (last 5 years) is more reliable.

I know that there are tough times ahead for all fishermen and that no matter what option you pick there will be people upset. I am asking that you use valid, recent data and take into consideration that some fisherman made the choice to stop groundfishing and unfortunately we should not be basing decisions on their wanting to change their mind. Please support the fisherman that made the conscious choice to stick with the industry even when it got hard.

Jim Ford

F/V Lisa Ann I

From: "Dan Murphy" <fvbantrybay@hotmail.com>
To: <MultsAmendment16@noaa.gov>
Sent: Friday, May 29, 2009 9:01 AM
Subject: DEIS for amd. 16 to the northeast multispecies FMP

Dear members of the council,

I would like to voice my opinion on which option I think the council should vote on. I would like the council to vote on the NO Action Alternative. There are a few good reasons why I prefer this option. First, most of my landings were made in the past five years. The reason for that is because in the earlier years our trip limits were very low so we targeted other species, such as scallop, hagfish, urchins, whiting and tuna. As a result, for not fishing groundfish we did not end up with great catch history. Second, All the options that capacity is being considered will not help the small boat fisherman. I own a small boat with small horsepower and with these options the small boat fleet will not have a chance. Finally, I think option 4 is not a good option. I do not think SNE and GB vessels should get GOM fish. Nor, should we get theres. I have a small boat so do many others, what are we going to do with GB fish? We do not have the means to catch them. You may argue that you will be able to trade fish or sell it. I wish that would be the case ,but that will not happen. SNE and GB vessels are going to travel the GOM to catch their GOM share.

Thank you for all your time

Daniel Murphy FV Bantry Bay

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May 31, 2009

Patricia Kurkul, Regional Administrator
National Marine Fisheries Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930

RE: "DEIS for Amendment 16 to the Northeast Multispecies FMP"

Dear Ms. Kurkul:

My name is Troy Bichrest. I am the "owner" and "captain" of the gillnetter, Pamela Grace. I am writing regarding the new sectors for 2010. As a small boat owner we are getting pushed out of the fisheries. We have not enough landings or financial backing to compete with the larger and offshore boats. It is my opinion, if you feel something has to be done, I strongly support ITQ instead of sectors for two reasons; first, it would be a lot cheaper for everyone involved to monitor and two, everyone would know exactly where they stand on how many fish they could land without depending on fellow fishermen. Going with sectors is going to further divide the fishing community more than it already is.

Thank you,

Troy Bichrest
F/V Pamela Grace

From: "Gary Libby" <pcredale@yahoo.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 01, 2009 5:34 AM
Subject: [DEIS for amendment 16 to the northeast multispecies FMP]

never stop fighting till the fight is done

--- On Sun, 5/31/09, Gary Libby <pcredale@yahoo.com> wrote:

From: Gary Libby <pcredale@yahoo.com>
Subject: comments
To: multsamendment@noaa.gov
Date: Sunday, May 31, 2009, 3:34 PM

I am writing to support option 2 for allocation under consideration at the June council meeting. Its the 50% catch history and 50% base line capacity of only the species within the vessels catch history.

I would also like to add in the concept of having an inshore/offshore line allowing sector based management within an inshore area, and the option of an IFQ based system offshore. So that the vessels asking for catch history only under option 1, would have an opportunity to plan their fishing businesses for the way that they chose to fish. This is a way to keep larger vessels going and smaller community vessels within sector/area based systems to also manage their businesses in a way that makes the most sense for both offshore/inshore vessels.

If the inshore/offshore concept can't be done in amendment 16, I would like to have it considered in amendment 17 under an area management program.

Captain Gary Libby
F/V Leslie & Jessica
Port Clyde, Maine

never stop fighting till the fight is done

From: <edward.buccigross@bbh.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 01, 2009 9:32 AM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Please support Option 3 for Codfish and Option 2 for Haddock in Amendment 16. A reduction in the Codfish limit from 10 to 6 is unfair. The GOM closure is an effective management tool and protects the fish during spawning. I also believe there should be a limit (9) on haddock similar to the codfish limit. Thank you.

Ed Buccigross
Brown Brothers Harriman
Operations - Central Pricing
Department Head

617-772-6467 ***** IMPORTANT

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From: <hawklobster@gwi.net>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 01, 2009 11:15 AM
Subject: DEIS Amendment 16

Regional Administrator Patricia Kurkul
National Marine Fisheries Service
One Blackburn Drive
Gloucester, MA 01930

Dear Regional Administrator Kurkul,

I do not support this in totality. This proposal does not seem to take into consideration your small owner operated groundfish boats. Which if close scrutiny was done you would realize that the small owner operated boats are more conservation minded, less of a threat to the overall catch. The unfair playing field over the past years of corporate run multi-boat owners vs owner operated small boat fishing is what has decimated the small coastal fishing towns. And in the past 15 yrs your rules appear to have rid the coast of these boats and not helped conserve the fish much either.

Sincerely,
sue Hawkes
22 Harbor Heights
Harpwell, ME 04079

From: "Louise" <weeziem@comcast.net>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 01, 2009 1:04 PM
Subject: "DEIS for Amendment 16 to the Northeast Multispecies FMP"

I am glad to have a chance to comment on amendment 16.

First, I feel that "history only" should be the preferred allocation method. Fishermen have had to purchase additional permits or vessels to stay afloat as "days at sea" have continually been ratcheted down. People who had to lease days gained history through landings, and this makes more sense than history divided by some other formula.

Sectors work, and as a Fixed Gear Sector member, we have been working with an ITQ allocation within our sector. Having the ability to plan ahead 6 months and make business decisions is very important. We have eliminated the discard issues that plagued us with the DAS system by being able to fish under a quota with a hard TAC. I would hope that the council will leave the 2 existing sectors with their '96 to '01 baseline that were given to them. To change them now sets a dangerous precedent that the allocation process could change under any new amendment. This will undermine anyone who is considering joining a sector, because of fear that things will change later. Let us choose the allocation process once and once only.

Thankyou for the chance to comment,
Sincerely, Jan Margeson
F/V Decisive F/V Great Pumpkin

From: "Fichera, Al [DPYUS]" <AFichera@its.jnj.com>
To: <MultsAmendment16@noaa.gov>
Sent: Tuesday, June 02, 2009 10:39 AM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

To Whom It May Concern:

I am writing to voice my opinion and concerns on the DEIS for Amendment 16 of the Northeast Multispecies FMP. **In regards to this matter, the first and foremost consideration is the allocation years that should be used in basing this decision. I support the utilization of the years 2001 – 2006, as this is best representation of the recent impact that recreational fishing has on the overall stocks concerning groundfish populations within the GOM.**

Using the allocation years from 2001 through 2006, there is no need to change the current size, bag limits or seasons for fishing Gulf of Maine (GOM) cod. Additionally, utilizing the years 2001 – 2006 would also allow the minimum size for GOM haddock be reduced to 18 inches. Using data that would include the years 1996 – 2001 is antiquated in its concept, as decisions today should be based on the real-time information that current research technologies allow.

Should the New England Fisheries Management Council decide to use the allocation years 1996 –2006, and a reduction is necessary in GOM cod and haddock bag limits, possession limits and seasons, then I strongly endorse Option Number Three for cod (which is a closed season Nov 1 April 15 – no size/possession changes) and Option Number One for haddock (increases GOM haddock size limit to 21" - no season or bag limit).

As the latest available data from 2001 – 2006 do not demonstrate that recreational fishing has a significant impact on GOM haddock and cod stocks, then the economic impact that the different options have on the charter boats and local amenities (hotels, motels, restaurants, gas stations, bait supplies, etc.) must be evaluated. The other options that restrict bag limits or increase size limits would have a significant negative impact on said economies as less people would invest the capital to fish these stocks. These local economies are already experiencing a negative impact due to the national and global economic situation, and further strain is unjustified and unwarranted.

In closing, please hear my voice – use the 2001 – 2006 allocation data and make no changes to the current size, bag limits or seasons for fishing Gulf of Maine (GOM) cod; additionally, please reduce the minimum size for GOM haddock to 18 inches. However, should the allocation years 1996 – 2006 be considered, please vote for Option Number Three for cod and Option Number One for haddock.

Thank you for your time and consideration in this matter.

Thank you,

Al Fichera
Group Development Manager
ThoracoLumbar Group

From: "Phillip Sego" <phil@philsego.com>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Tuesday, June 02, 2009 11:18 AM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service ----- I support Proposed Amendment 16. I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery; Implement sector management; Implement Science-based annual catch limits on all managed fish stocks; Include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and establish a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species.

Phillip Sego, phil@philsego.com
221 Norfolk Street, Cambridge MA 02139-1402
tel: 1-617-492-1032, cell: 1-617-610-3054

From: "Phillip Sego" <phil@philsego.com>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Tuesday, June 02, 2009 11:18 AM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service ----- I support Proposed Amendment 16. I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery; Implement sector management; Implement Science-based annual catch limits on all managed fish stocks; Include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and establish a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species.

Phillip Sego, phil@philsego.com
221 Norfolk Street, Cambridge MA 02139-1402
tel: 1-617-492-1032, cell: 1-617-610-3054

From: "Patrick Mertens" <patrickmert@yahoo.com>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Tuesday, June 02, 2009 1:54 PM
Subject: I support Amendment 16

I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery;
Implement sector management;
Implement Science-based annual catch limits on all managed fish stocks;
Put in place strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and
A comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species)

Thanks

Patrick Mertens
103 Union Street
Watertown MA 02472-2524

From: "Paul Boyce" <paul.boyce@sbcglobal.net>
To: <MultsAmendment16@noaa.gov>
Sent: Tuesday, June 02, 2009 2:33 PM
Subject: Revised GOM cod and haddock rules

To whom it may concern:

As a person who loves to ground fish Stellwagen and Tillies and trailer a boat for a 300 mile round trip about 6-8 times a year, please consider choices as follows:

Codfish option #3 (loss of two weeks in April)

Haddock option #1

Thank you very much

From: <charlese3@peoplepc.com>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Tuesday, June 02, 2009 2:43 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service ----- I support Proposed Amendment 16. I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery; Implement sector management; Implement Science-based annual catch limits on all managed fish stocks; Include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and establish a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species.

Sincerely,

Eunice Charles
35 Waterston Ave
Quincy MA 02170

From: "Bill Keller" <bill.keller2@comcast.net>
To: <MultsAmendment16@noaa.gov>
Sent: Tuesday, June 02, 2009 3:08 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Please reconsider the current thinking for amendment 16. You will devastate the charter fishing industry in New England and impact recreational anglers as well. Recreational anglers are not the problem, it is the commercial guys!

Thanks for your consideration.

Regards,

Bill Keller
Home Office: 978.463.0878
Cell Phone: 978.290.1448
Home: 978.463.9987

From: <mattrigney268@comcast.net>
To: <MultsAmendment16@noaa.gov>
Sent: Tuesday, June 02, 2009 4:52 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP and turn NEFMC recommendation for 100% monit

Amendment 16

Dear Regional Administrator Kurkul,

We know that conventional fisheries management regimes have failed for more than 30 years. We need innovative new methods, and this catch share proposal (co-op sectors) is a good idea.

You and the Council have worked tirelessly to develop effective sector management in the New England groundfish fishery.

I hope you will protect the investments of sector members and strengthen their ability to work together by ensuring all groundfish vessels are bound by a hard, annual catch limit by 2010.

Sincerely,
Matt Rigney
268 Shelburne Falls Road
Conway, MA 01341

cc:
Regional Administrator Patricia Kurkul

From: "Margaret McGinnis" <margaretmcginnis@verizon.net>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Tuesday, June 02, 2009 8:17 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service ----- I support Proposed Amendment 16. I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery; Implement sector management; Implement Science-based annual catch limits on all managed fish stocks; Include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and establish a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species.

From: <mattrigney268@comcast.net>
To: <MultsAmendment16@noaa.gov>
Sent: Tuesday, April 28, 2009 8:09 PM
Subject: DEIS Amendment 16

Regional Administrator Patricia Kurkul
National Marine Fisheries Service
One Blackburn Drive
Gloucester, MA 01930

Dear Regional Administrator Kurkul,

What we've done to the oceans and to fish stocks is sadly the result of human greed and shortsightedness.

I doubt any of us can really imagine what the ocean looked like before humans began applying industrial catch technologies to ecosystems, under the illusion that the abundance of the sea was endless.

Those days are over, and we need to begin working urgently to rebuild stocks and increase the robust health of ecosystems. We need more fish in the sea, and more of them allowed to stay there.

Please take these monitoring and catch shares measures outlined in DEIS Amendment 16.

Sincerely,
Matt Rigney
268 Shelburne Falls Road
Conway, MA 01341

Joan O'Leary

From: Paul Howard
Sent: Thursday, June 04, 2009 2:51 PM
To: Tom Nies
Cc: Joan O'Leary
Subject: FW: DEIS for Amendment 16 to the Northeast Multispecies FMP

-----Original Message-----

From: jongeary@jkgitc.com [mailto:jongeary@jkgitc.com]
Sent: Thursday, June 04, 2009 1:50 PM
To: multsamendment16@noaa.gov
Cc: Pat Kurkul; Paul Diodati; Paul Howard; Barry Gibson; John Pappalardo; Rip Cunningham
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service,

I am a long time commercial ground fisherman, I mainly fish in the highly regulated Cod and Haddock fisheries, under my hand gear permit. I am a Rod and Reel fisherman, and I have seen, first hand, the poor state that our fishery is in. I am writing to agree with the view that a reduction to the fishing pressure on and harvestable quota of Cod and Haddock ground fish stocks is necessary and that this should factor into the commercial and recreational components of the fishery.

Having reviewed the draft recommendations for both the Cod and Haddock fisheries, I am writing to request that you vote for Option Number Three for the cod fishery, which specifies a closed season Nov 1 April 15. And for haddock, I am requesting that you vote for Option Number 01, which is an increase in size to 21" and no season or bag limit.

Our Haddock stocks have seen a strong recovery, only to be undermined by the rules which lowered the minimum size to 18" to allow for the immediately harvest as much of our strong year classes as possible. If we had let these fish mature and reproduce for a few more years and harvested them when they reached 21" instead, I am sure we would have increased the health of the fishery greatly with only minor financial burdens.

Thank you for your time,

Jonathan Geary
31 Whitman Ave
Chatham MA, 02633

From: "Stephane Acel" <stephaneacel@hotmail.com>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Wednesday, June 03, 2009 4:32 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service ----- I strongly support Proposed Amendment 16. As a sports fisherman and consumer of New England fish, I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery; Implement sector management; Implement Science-based annual catch limits on all managed fish stocks; Include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and establish a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species.

Sincerely,
Stephane Acel-Green
29 Carroll Street
Watertown, MA 02472

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From: <shawmps@shawmps.com>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Wednesday, June 03, 2009 4:43 PM
Subject: Amendment 16

Dear NMFS,

I am writing to support Proposed Amendment 16.

I urge the agency take immediate action to end overfishing.

I would like to see you implement sector management as well as science-based annual catch limits on all managed fish stocks.

Thank you for your time.

Shawn Schillberg
Norton, MA

From: "CHRISTOPHER CHARETTE" <charettelandsurveying@verizon.net>
To: <MultsAmendment16@noaa.gov>
Sent: Wednesday, June 03, 2009 10:50 PM
Subject: Deis for Amendment 16 to the NE MultispeciesFMP

It has been brought to my attention that it may be necessary for a reduction in the season and or bag limits for both cod and haddock in the GOM. I'm a recreational fisherman and fish privately from my own boat with my kids. I would like to request that if a reduction is necessary that you use Option #3 for cod and Option #1 for haddock.

Thank you for your time.

Sincerely

Chris Charette
(508) 261-1582

From: "R.K. O'Hara" <rae.k.ohara@gmail.com>
To: <MultsAmendment16@noaa.gov>
Sent: Thursday, June 04, 2009 7:00 AM
Subject: DEIS for amendment 16 to the northeast multispecies FMP

June 1 2009
Brian O'Hara
Dragon Fisheries
POBox 119
Jamesown RI 02858

RE: DEIS for Amedment 16 to the northeast multispecies FMP

Patricia Kirkul or to whom it may concern:

I am writing in regards to the Sector allocations. It is my opinion that options #2 or #4 are the only acceptable options when calculating allocation. Days at sea and baseline cannot be overlooked in this matter. For the past 20 years, DAS has been the "currency" of the fishing industry, and it has been by this standard that we have been following. Now, to go and change the standard of measurement would be akin to the US adopting the Euro (or the metric system).

Thank you for your time:

Sincerely:

Brian J O'Hara
President, Drag-on Fisheries LLC

From: <rosmar@boatracs.com>
To: <MultsAmendment16@noaa.gov>
Sent: Thursday, June 04, 2009 12:33 PM
Subject: DEIS AMEND 16 NE MULT FMP

SENT BY BOATRACS BOAT-TO-EMAIL SERVICE

FROM:ROSMAR
POSITION: 0420345N, 0693837W, 24 M ENE of Truro, MA
MESSAGE:SECTORS ARE HERE FOR THE MIXED
TRAWL FISHERY. GET IN A SECTOR OR BE
LEFT IN THE COMMON POOL. NMFS HAS MADE
THE PRESS RELEASES, AND ALL CONCERNED
GROUPS HAVE ENDORSED SECTORS. SECTORS
HAVE NOT BEEN PROVEN IN THE MIXED
TRAWL FISHERY ANYWHERE IN THE WORLD.
IF WE ARE HEADED FOR ITQS IN THE NEXT
AMENDMENT, OPTION 1 FOR PSC'S MAKES
THE MOST SENSE. LANDINGS HISTORY FROM
1996-2006 NOT INCLUDING ANY LEASING
LANDING HISTORY. LEASING LANDING
HISTORY SHOULD NOT BE CONSIDER BECAUSE
AT THE TIME IT WAS A PILOT PROGRAM AND
BROUGHT IN LATENT EFFORT TO THE
FISHERY AND HAS THWARTED REBUILDING
EFFORTS.
TO CONSERVE HADDOCK FOR THE FUTURE,
THE MINIMUM SIZE LIMIT SHOULD INCREASE
INSTEAD OF DECREASE. DISCARD PROBLEMS
COULD BE SOLVED VERY EASILY WITH THE
USE OF SQUARE MESH ON GEORGES. THIS
WOULD GO A LONG WAY TO CONSERVE COD,
HAKE,OCEAN POUT AND WOLFISH.
CLOSED AREAS SHOULD REMAIN CLOSED
TO ALL GEAR TYPES INCLUDING LOBSTER
GEAR. THE CONCEPT HERE IS APROPAGATION
AREA FOR MARINE LIFE. THE SAP'S HAVE
HAD VERY LIMITED SUCESS. LOBSTER
GEAR IN THE AREA KNOWN AS THE TRIANGLE
WHICH WAS TRADITIONALLY TRAWL BOTTOM
HAS MADE IT SO A SAP CAN'T EVEN BE
ATTEMPTED. MICHAEL MATULAITIS F/V
ROSE MARIE 111 WINTERGREEN LN.
BREWSTER, MA 02631 508-280-0490

From: <rosmar@boatracs.com>
To: <MultsAmendment16@noaa.gov>
Sent: Thursday, June 04, 2009 1:06 PM
Subject: DEIS AMENDMENT 16 NE MULT FMP

SENT BY BOATRACS BOAT-TO-EMAIL SERVICE

FROM:ROSMAR
POSITION: 0420322N, 0694407W, 19 M ENE of Truro, MA
MESSAGE:CONT.
THE PROPOSED STACKING OF PERMITS
(SCALLOP+MULT.) SHOULD BE HELD OFF
UNTIL AFTER CA 2 OPENS FOR SCALLOPS
THIS FISHING YEAR. MY GUESS IS THAT
SCALLOPERS ARE GOING TO NEED SOME
MORE YT QUOTA TO GET AT THE SCALLOPS
IN CA 2 BECAUSE OF HIGH YT ABUNDANCE.
MICHAEL MATULAITIS 111 WINTERGREEN LN
BREWSTER,MA 02631 508-280-0490

From: <jongeary@jkgitc.com>
To: <MultsAmendment16@noaa.gov>
Cc: <Pat.Kurkul@noaa.gov>; <paul.diodati@state.ma.us>; <phoward@nefmc.org>; <BarryGibson6@aol.com>; <johnp@ccchfa.org>; <Ripcham@verizon.net>
Sent: Thursday, June 04, 2009 1:50 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service,

I am a long time commercial ground fisherman, I mainly fish in the highly regulated Cod and Haddock fisheries, under my hand gear permit. I am a Rod and Reel fisherman, and I have seen, first hand, the poor state that our fishery is in. I am writing to agree with the view that a reduction to the fishing pressure on and harvestable quota of Cod and Haddock ground fish stocks is necessary and that this should factor into the commercial and recreational components of the fishery.

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Jonathan Geary
31 Whitman Ave
Chatham MA, 02633

From: "Amanda Odlin" <aodlin@maine.rr.com>
To: <MultsAmendment16@noaa.gov>
Sent: Thursday, June 04, 2009 1:50 PM
Subject: Amendment 16 Comment

To: Pat Kurkul,

Our comment on Amendment 16 is to select Alternative 2 (50% capacity added to 50% history **apply only to stocks caught on permit). After carefully weighing the poor selection of options, we feel that Alternative 2 is in our best interest.

From,

Christopher & Amanda Odlin

F/V Lydia & Maya

F/V Bethany Jean

From: "David Dow" <ddow420@comcast.net>
To: <MultsAmendment16@noaa.gov>
Cc: "David Dow" <ddow420@comcast.net>
Sent: Thursday, June 04, 2009 2:52 PM
Subject: DEIS for Amendment 16 to Northeast Multispecies FMP

I feel that findings of the Omnibus Habitat Amendment's "vulnerability analysis" on the effects of mobile fishing gear on Essential Fish Habitat (EFH) for the New England Fishery Management Council's (NEFMC) 27 managed species should be incorporated into Amendment 16 to the Northeast Multispecies FMP. The Omnibus Habitat Amendment designates EFH for roughly half of species covered in Amendment 16. In addition, the combined effects of climate change and commercial fishing harvesting/bycatch should be considered in setting the Total Allowable Catches (TACs) and recovery schedules for overfished stocks covered under Amendment 16. Since the invertebrate benthic prey species for the groundfish species covered under Amendment 16 are likely to change their ranges and seasonal temporal/spatial distribution slower than the fish themselves and epibenthic prey species, ocean climate change (natural and human induced) is likely to create gaps between prey and their predators which will influence the secondary production (potential harvest rates of the species managed under Amendment 16.

Amendment 16 should indicate how the NEFMC and NOAA Fisheries will transition from multispecies management to an ecosystem approach to management (EAM). An EAM approach could address issues important to potential fish production and yield, such as climate change; alterations in prey species distribution/abundance; effects of mobile fishing gear on EFH and potential fish production; impacts of static fishing gear on the incidental mortality of marine mammals and sea birds; importance of forage fish in coupling the plankton to the groundfish addressed under Amendment 16; etc. The current Virtual Population Analysis (VPA) techniques used to predict the TACs don't address many of these ecosystem challenges that effect the potential groundfish harvest. An interim step might be to utilize a multispecies VPA, since NOAA Fisheries Northeast Bottom Trawl Survey (BTS) Food Habits database includes information on epibenthic and benthic prey species back to the 1970s. This modelling effort will have to be supported by a better resource monitoring program that employs an ecosystem perspective and includes ecological indicators to measure the health of the food chain supporting living marine resources (LMRs) and the environment on which they depend. The BTS program has been basically unchanged since it was implemented back in the 1960's (other than getting a new vessel and bottom trawl type in recent years). The Northeast Regional Office (NERO) and Northeast Fisheries Science Center (NEFSC) need to work together to gather fishery independent information that is more useful in supporting the emerging EAF paradigm.

To ensure a sustainable future for groundfish, it makes sense to move towards a sector approach for allocating the TAC amongst the commercial fishing groups. Adjustments in the TAC allocation will be required to account for bycatch of undersized target fish species and catch/release mortality of the less valuable components of the Multispecies FMP with a focus on the species with greater commercial value. Sustainable management of the groundfish will require a new approach to address risk and to establish the uncertainty in the TAC estimates. Uncertainty needs to address both the quality and quantity of fishery dependent and independent data used to support the management process (not just the error bars around the TAC estimates). I would encourage use of "vulnerability analysis" and estimates of "resilience" (both natural and social science aspects) as components of sustainable fisheries. In climate change the responses include adaptation, mitigation and resilience and the same is true for sustainable fisheries. We manage the behavior of "fishers" and not the fish themselves, so that we have to approach sustainable fisheries from a more holistic philosophy and better integrate

science/management/outreach to constituents. EAF will require much more effective constituent outreach which will require more resources (\$ and people) and new tools/staff training.

I have incorporated these ideas in the following bullets:

- * Since there is a directed fishery management plan for Atlantic Herring which is an important prey species for targeted fish species; nontarget fish species; marine mammals/seabirds and these forage species link the lower levels (plankton) in the food chain to higher levels (fish, seabirds and marine mammals), the total allowable catch (TAC) should consider the needs of these other users of forage fish (Atl. herring, menhaden, juvenile Atl. mackerel, etc.).
- * The NEFMC's Habitat, MPA and Ecosystem Committee is developing an Omnibus Habitat Amendment for the Council's 27 managed species. This committee is doing an analysis of the effects of fishing gear on essential fish habitat (EFH) which should be incorporated into Amendment 16. The other factor that is not being addressed is climate change (natural and manmade) which is an emerging stressor on fish populations and their prey. Mobile fish and epibenthic invertebrates can change their spatial/temporal distribution patterns much more readily in response to climate change than their immobile benthic invertebrate prey. This will disrupt the ocean food chain supporting living marine (fish), protected (marine mammals and sea turtles) and natural trust (seabirds) resources in the ocean.
- * The NEFMC needs to move to an ecosystems approach for fisheries management (EAF) to replace the multispecies groundfish FMP, so that they can incorporate the issues listed above in Amendment 16. NOAA Fisheries scientists have investigated this approach, but the policy makers and managers have been slow to respond to make EAF operational. Now that Dr. Jane Lubchenco is head of NOAA, she is likely to require a transition to EAF and Amendment 16 needs to address this change.
- * Implement Sector management amongst commercial interests
- * Need for a more comprehensive monitoring and reporting system based on an adaptive management philosophy that links modelling---monitoring---ecological indicators/ reference points (strategic and tactical)---management measures---constituent outreach (environmental NGOs, animal rights groups, public, commercial fishermen/women, and saltwater anglers)
- * Strong accountability so that fishing ceases once TAC is reached and correction for overages if they occur. This TAC needs to explicitly address the needs of the wider marine ecosystem and food chain supporting marine wildlife, not just target species
- * Include components of Omnibus Habitat Amendment in the Amendment 16 process and TAC allocations for the groundfish stocks
- * Take immediate action to end overfishing and restore stocks subject to excess fishing mortality/overfished stock status. Need to develop a strategy to move toward sustainability and EAF.

Thanks for your consideration of these comments on Amendment 16.

Yours truly,

Dr. David Dow
18 Treetop Lane
East Falmouth, Ma. 02536-4814

Phone: 508-540-7142

Email: ddow420@comcast.net

From: "Chris Porter" <cdptrans@gmail.com>
To: <MultsAmendment16@noaa.gov>
Sent: Friday, June 05, 2009 8:31 AM
Subject: DEIS for Amendment 16 to the NE Multispecies FMP

To whom it may concern,

I am writing in support of the proposed Amendment 16 to change fisheries management practices in New England. It is critically important that we manage our fisheries sustainably. I enjoy eating fish but do so only occasionally, because I am concerned about overfishing of stocks. If necessary, both the fishing industry and New England consumers must make short-term sacrifices in order to ensure the long-term health of our fisheries.

Amendment 16 would implement sector management practices and science-based annual catch limits on all managed fish stock. I urge you to include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught.

Sincerely,

Chris Porter
230 Lexington Ave.
Cambridge, MA 02138
617-354-3751
cdptrans@gmail.com

From: <bduncan11@cox.net>
To: <MultsAmendment16@noaa.gov>
Sent: Friday, June 05, 2009 8:41 AM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Please support option three on Amendment 16

From: "GARRY GLECKEL" <gleckel@verizon.net>
To: <MultsAmendment16@noaa.gov>; <office@sierraclubmass.org>
Sent: Friday, June 05, 2009 10:25 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear National Marine Fisheries Service ----- I support Proposed Amendment 16. I urge the agency take immediate action to end overfishing and help restore New England's historic groundfish fishery; Implement sector management; Implement Science-based annual catch limits on all managed fish stocks; Include strong accountability measures that ensure fishing ceases once limits are reached and that correct overages if they occur; and establish a comprehensive monitoring and reporting system that provides accurate estimates on all fish caught (landings and discards of all species.

Garry Gleckel
185 Main St
Ashby, MA 01431

From: "Hope Bichrest" <hbichrest@hotmail.com>
To: <MultsAmendment16@noaa.gov>
Sent: Sunday, June 07, 2009 8:53 AM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

From:
Bryan Bichrest
F/V Safe Haven
Permit Number 242844

I am fifty years old and have been fishing since I started Tub Tralling for cod fish with my father at age 10. Since that time, I have fished for everything in the gulf of Maine such as, cod, halibut, tuna, shrimp, lobster, mussels, scallops, flounder, to name just a few.

I have accumulated 3 permits with average history. With The qualifications to go fishing on these permits was an "A" day, you did not need history to go fishing. With your calculations, I would make out better going with straight history but I feel that it is unfair taking all of the value out of an "A" day, when other fisherman have stayed with the fisheries when they could have cashed in and got out. If you use history along, you should add the past two years to get a true measure of which fisherman have actually stayed true to the fishery.

I feel that **OPTION 2**, is the only fair way because it is the only option that treats people fair and gives them the opportunity to fish where they have historically fished.

As far as the sectors go, I would rather go to straight tac because I am a small boat and going through a sector would be economically challenging.

I feel that the new proposal for bi catch is unfair as it is actually taking out our bi catch twice. To be fair you should add our bi catch on to our past history and then deduct a new amount. There was much more bi catch during those 10 years that you are using for a base line than what we are doing now, especailly the year that there was a 40 lb limit on cod fish. Besides, are they really bi catch or just part of the eco system?

We are a fishing family with 3 kids in college. One of my sons has been fishing with me and on his own every summer since he was a boy. He, most likely, will follow the family tradition of fishing once he graduates. I do think it is important to stop fisherman from wasting fish, but it is important to consider all boat size or it will end up that big investment companies, owned by outside investors, will by up all the history and will put many small fishing communties out of business.

Thank you for taking my thoughts into consideration.

Bryan Bichrest

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From: "Challinn" <chalinn@comcast.net>
To: <MultsAmendment16@noaa.gov>; <MultsAmendment16@noaa.gov>; <MultsAmendment16@noaa.gov>;
<MultsAmendment16@noaa.gov>
Sent: Sunday, June 07, 2009 9:15 PM
Subject: Amendment16

June 4, 2009

Patricia Kurkul, Regional Administrator
National Marine Fisheries Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930
Fax: (978) 281-9207
e-mail: multsamendment16@noaa.gov

Re: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear Ms. Kurkul,

For the past few years there has been a growing concern among members of the fishing community that the Council was developing options for allocation in Amendment 16 that would forever change the face of the commercial groundfish fishery. Many believed a deliberate and highly transparent process and discussion would take place. But this has not been the case.

Permit holders just received their landings data with associated allocation options (percentage quota shares) a week before the public hearings began. Permit holders have not been provided sufficient time or information to effectively understand how these options impact their business, their fishing community nor have they considered how a dual system established for Sectors and Common Pool participants will emerge. The worst part is that we will not have the full picture until this fall when the final TACs are determined. Basically we are being asked to make critical decisions without knowing all the information.

As the Council continues to move full steam ahead, with the NOAA Fisheries fueling the poorly guided process by pressuring the Council and permit holders to make decisions without the adequate information, I strongly urge the Council & NOAA to ensure:

- The baseline years chosen for the allocation should be the same for all "sectors" of the fleet (commercial v. recreational and sector v. sector).
- The Council must remain committed to adopting a management system for the Common Pool fishery that is not treated or considered a "cesspool" for those that are enrolled.
- Transferability within and between Sectors must be allowed. Catch history during such transfers should be considered temporary. The history should remain frozen with the original permit thus not be credited to the lessee, lesser or the Sector.
- Sectors should be treated as a management tool to achieve economic and administrative efficiencies. *Policy decisions should not direct the costs to outweigh the potential benefits.*

Sincerely,

Donna R. Chamberlin, 124 Concord St, Gloucester, MA
Signature

From: "Anthony Gross" <anthonygross@comcast.net>
To: <MultsAmendment16@noaa.gov>
Sent: Sunday, June 07, 2009 9:17 PM
Subject: "DEIS for Amendment 16 to the Northeast Multispecies FMP"

Sir, Madam,

I am writing in opposition to the proposed sectors program in Amendment 16.

This form of fishery allocation will destroy the vitally important independent commercial fishing enterprises that it so ironically claims to be helping. The formulas used to determine catch allocations overwhelmingly favor large vessels. This is neither equitable or good practice, considering that large vessels do far more damage to the fish stocks and ocean habitat, especially the sea floor. As the Agency charged to protect all aspect of the fisheries, including fishing communities, and the oceans themselves it is unfathomable to think that these sectors can be thought of as a reasonable approach. Is there no common sense involved here? Is the Agency caught up in the pressures of outside lobbyists? By the Agency's own info groundfish take has declined 44% from 2001 to 2007 and most fish stocks are increasing. Why on earth would anyone implement a plan the will forever shut down hundreds of small business, particularly since those businesses have proven resiliency to survive tough times (as recently proven to be necessary for a stable economy). The cost of the proposed observer program alone will put many of the small boats out of business.

I'm sure there are some (large vessel owners who stand to benefit) who agree with this approach, I question the motives and intellect behind what I believe is a disaster, and **more importantly you need to question is this right, many families will be destroyed with little or no benefit to the fish stock.**

Sincerely,
Anthony M. Gross
18 Nashua Ave.
Gloucester, MA

From: "Marc S." <ijigcod@mindspring.com>
To: <MultsAmendment16@noaa.gov>
Sent: Sunday, June 07, 2009 11:48 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Dear NMFS/NEFMC

There is a error in the document on page I-478 in the paragraph below regarding Handgear A permits. The sentence "*The period is selected by the permit holder and can be taken during a rolling closure.*" is incorrect since Handgear A & B permits can not choose when to take their 20 day spawning closure. It was set many Amendments ago at March 1-20 for handgear permits.

"The only limits on fishing days are a requirement to not fish during a 20-day period in the spring." Handgear permits are restricted to the same seasonal rolling closures as DAS vessels which is several months long depending on location so this statement should be revised.

I support the increase in the GOM cod trip limit to 750 lbs. I suggest that the limit be increased to 800 lbs which is easier to determine the weight of the fish as being a full tote. It is difficult to estimate 50 lbs of fish. This a similar rounding up was made under the previous Amendment or framework for handgear permits.

Regarding Handgear A permits for sector allocation calculations, HP and DAS are used in addition to history I would use the average number of trips that each handgear permit made for goldfish up to the maximum number of DAS regular DAS would have. HP can also be used since it is listed. It would not be fair to set DAS or HP to zero for Handgear A permits if these sector allocation formulas are used.

Regarding Dockside Weigh masters. I believe this is a unnecessary burden on the industry and at this time is not warranted. It is far easier to just modify the VTR to have a box and assign each sector a number. Then the dealer can report which sector the fish came from.

V/R

Marc Stettner

91 Fairview Ave

Portsmouth NH 03801

"In addition to modifying effort controls for limited access fishing vessels, this option modifies the GOM cod trip limit for vessels with Handgear A (to 750 pounds) and Handgear B permits (to 200 pounds). These permit holders are allowed to use both handgear and tub-trawls. The only limits on fishing days are a requirement to not fish during a 20-day period in the spring. The period is selected by the permit holder and can be taken during a rolling closure....."

To Whom It May Concern:

I attended the public hearing on May 26, 2009 and would like to share my whole hearted belief that Option 1 is truly the only plan that realizes the feasibility of sector-based fishing regulations as well as the endpoint of viable conservation. As an owner/captain of a New Bedford based vessel for over 39 years, I endorse Option I, a "history based" plan, as one which allows those fisherman who have annually produced, documented and adhered to government regulations as the only plan which affords sustainability of a species and the prospect of earning a living.

A history based plan recognizes the working vessels who have endured the various regulations imposed (i.e. limited days at sea, trip limits, daily limits, mesh size restrictions, seasonal closures, rolling closures etc....) and have survived, to be allowed to participate in the forward thinking of the proposition of Option I. To allow those permit holders who have NOT actually obtained a history is to essentially reward those permit holders to bypass all the above stated rules and regulations. Why should the speculative nature of purchasing random non-history permits be rewarded? It does not serve the rebuilding of stocks nor does it serve those fishermen who have always adhered to the rules and regulations and thereby are able to produce and maintain a catch history.

In closing, sector based policies can only succeed with the diligence of those fishermen who've maintained history based permits. The purchasing of speculative non-history permits must be seen as just that.... speculation. The success of fisheries management lies with those of us who've actually produced and not merely speculated. Option 1 provides hope for the New England fisheries as well as the true New England fisherman.

Respectfully submitted,

Albert (Toby) C. Lees

Owner/Captain F/V SEEL&TROPICO

From: "Mark Roberts" <mrobert3@maine.rr.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 9:07 AM
Subject: "DEIS for Amendment 16 to the Northeast Multispecies FMP"

Please be advised that the fishing vessel Deborah Ann 251364 & 455 is in favor of Option #1. We are also in favor of NO HARD TAC for the common pool as we feel it will cause market gluts and safety issues.

We are also in favor of requesting and receiving our individual permit history by year for our landings.

Mark C. Roberts

F/V Deborah Ann

207-671-1280

From: "Susan Murphy" <Susan.A.Murphy@noaa.gov>
To: "Douglas Christel" <Douglas.Christel@noaa.gov>
Sent: Monday, June 08, 2009 10:50 AM
Subject: [Fwd: Fw: new limit proposals]

----- Original Message -----

Subject: Fw: new limit proposals
Date: Mon, 08 Jun 2009 09:20:06 -0400
From: Pat Kurkul <Pat.Kurkul@noaa.gov>
To: 'George.Darcy@noaa.gov' <George.Darcy@noaa.gov>, 'Susan.A.Murphy@noaa.gov' <Susan.A.Murphy@noaa.gov>

From: Beaglevt@aol.com <Beaglevt@aol.com>
To: pat.kurkul@noaa.gov <pat.kurkul@noaa.gov>
Sent: Mon Jun 08 08:36:41 2009
Subject: new limit proposals

Hello, After looking at the new regulations for deep sea fishing I feel I need to express my opinion. For 25 years I have made a trip to Maine or NH to deep sea fish for 2-3 days per year. I do this so I will have fish to eat throughout the year. With the new regulations I do not think I would risk spending the money for less fish to possibly bring home. The recreational angler is something that we may see a lot less of in the near future if these laws go into effect. In the ole days I remember seeing draggers pull thousands of pounds of fish in one drag and it amazes me that we would be the ones having limits imposed.....so in the meantime I plan on looking at buying a small boat that I can fish the beautiful freshwater lakes of Vermont to catch what I need versus spending all kinds of money heading to the ocean to let many fish go that will probably die upon their release anyway....Its sad that nobody protects the recreational angler.....the numbers will dwindle trust me of those who have enjoyed what I have for years without really harming the fish stocks....AIM your attention at the netters taking all the herring....how can you allow these commercial fisherman to take the very food supply that the cod and haddock rely on to grow???.....Maybe you should spend 30 days on the ocean and see for yourself...

Thank-you,
Jay Kennedy

Catamount Studios
613 King Road
Elmore, Vermont 05680
USA
phone 802-888-7700
home 802-888-7456

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From: "Michael and Lori Leary" <cbat@comcast.net>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 12:04 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Patricia Kurkul
Regional Administrator
National Marine Fisheries Service
Northeast Region
Gloucester, MA 01930

Dear Ms. Kurkul,

My name is Michael P Leary and I own and operate the F/V Lori B. I have enrolled in a sector and the only option for allocation that keeps my business viable is option 1: Landing history **only** during FY 1996-2006. The other capacity options that use vessel characteristics is discriminatory. The council should be consistent with other FMP's and allocate using history only during the longest time period possible.

Thanks,

Michael P Leary
F/V Lori B 146819

From: "Eric Brazer" <eric@ccchfa.org>
To: <MultsAmendment16@noaa.gov>; <Rider0503@aol.com>
Cc: "'Eric Brazer'" <eric@ccchfa.org>; "'Sue Nickerson'" <suenick@ccchfa.org>
Sent: Monday, June 08, 2009 5:07 PM
Attach: Allocation to Existing Sectors.doc
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP - Fixed Gear Sector comments

Dear Administrator Kurkul,

On behalf of Glen Libby, in his capacity as Captain of the F/V Skipper (not as Chairman of the MFA), please accept this comment on the DEIS for Amendment 16 to the Northeast Multispecies FMP.

Thank you in advance for your consideration of his recommendations.

Cheers,
Eric

Eric Brazer, Jr.
Manager, GB Cod Fixed Gear and Hook Sectors
Fisheries Policy & Management Coordinator, CCCHFA
210-E Orleans Road, North Chatham, MA 02650
508.945.2432 (phone)
508.945.0981 (fax)
eric@ccchfa.org

From: "Bonnie Brady" <greenfluke@optonline.net>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 5:00 PM
Subject: "DEIS for Amendment 16 to the Northeast Multispecies FMP"

It is the belief of the Long Island Commercial Fishing Association that there is no need for the drop chain requirement for SNE/MA small mesh fisheries gear (§4.4.2.5): since there is no science to prove it's efficiency or lack thereof, and according to the Regional Administrator of NERO/NMFS at the Portsmouth, NH audiotape #8 2:13:50, meeting of the NEFMC, NMFS has never done a gear-modification without science to back it up. Since this modification would have a devastating effect on SNE's squid and whiting fisheries without any proof that it will have any effect on SNE/MA winter flounder, we request that this requirement be removed from the finalized Amendment 16 document.

Also, re Non-sector vessels, we request the No Action alternative (§4.4.2.1) as a preferred choice, since with moratorium on winter flounder, there really isn't a need for more restrictive measure, the moratorium has effectively closed the area to groundfishing.

Sincerely,
Bonnie Brady
Long Island Commercial Fishing Association

From: <Hugetuna@aol.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 4:59 PM
Subject: DEIS for amendment 16 to the northeast multispecies FMP

I strongly urge the NEFMC and NMFS to select the allocation years of 2001-2006 to determine action under Amendment 16 to ground fishing among the recreational and commercial fisheries. there has been many regulatory actions over the last 15 years that effect the catch of both recreational and commercial fishermen. The period of 2001 to 2006 more accurately represents our catch now. While the period of 1996 to 2006 slightly favors less restrictions for commercial fishermen it does not represent what commercial fishermen are catching and sets severe restrictions to recreational fishermen. Please choose an allocation period 2001-2006 for amendment 16.

Capt. Tom DePersia president
Stellwagen Bank Charters Boat Association

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From: <plowoho@comcast.net>
To: <MultsAmendment16@noaa.gov>
Cc: <tnies@nefmc.org>
Sent: Monday, June 08, 2009 4:56 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Gentlemen,

In my opinion the requirement for those wishing to form sectors to have to produce or pay to have produced an environmental impact statement focusing on its sector violates the Regulatory Flexibility Act. This requirement, one that is not explored as an alternative in any regulatory document to this FMP, amounts to a tax on those who wish to form a sector. The net result of this requirement is the production of 17 inferior and unnecessary EISs while the Agency produces its own as it is required. Nothing new is learned from the information provided. This clearly singles out a subset of small producers who seek more efficient operating options.

If these EISs are being relied upon to predict environmental impacts of changing fishing patterns, the agency (NOAA Fisheries) is derelict in relying on this information. This kind of unnecessary information does "appear" to justify NEPA concerns, however. Or perhaps there is some thought of restricting or controlling production. Why should vessels be required to list where they will sell their product?

If the agency is depending upon the EISs to reveal and mitigate any increase in effort by sector vessels in other fisheries, the agency is derelict in relying on this information and in not preparing other participants in other FMPs of the need for them to initiate regulations that will prevent the inter-fishery flow of additional effort.

Pushing fishing companies to seek deeper pockets to provide funds for development of non-productive EISs can put their independence and freedom to act in jeopardy. This same process may, in fact, lead to their inability to resist coordinated action in marketing their output.

Sectors should be as independent of each other as possible. One of their primary reasons for being is to provide the opportunity to rationalize their operating expenditures and capital. Beyond that, coordinated fishing or not fishing or other fleet-level or multiple sector level coordination could easily result in less competition in the production of fish, or the perceptions of same, and possible bring legal problems for all sector participants.

Yet it is the blind application of NEPA rules that can push operators into the arms of those with deeper pockets who could see various forms of "coordinated harvesting" as advantageous.

Thanks for this chance to comment

Phil Logan
Woods Hole MA

From: "Eric Brazer" <eric@ccchfa.org>
To: <MultsAmendment16@noaa.gov>
Cc: "Eric Brazer" <eric@ccchfa.org>; "Sue Nickerson" <suenick@ccchfa.org>
Sent: Monday, June 08, 2009 4:43 PM
Attach: A16 Hook Sector Comments.pdf
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP - Fixed Gear Sector comments

Dear Pat,

On behalf of the Georges Bank Cod Hook Sector, please accept these comments on the DEIS for Amendment 16 to the Northeast Multispecies FMP.

Thank you in advance for your consideration of our recommendations.

Cheers,
Eric

Eric Brazer, Jr.
Manager, GB Cod Fixed Gear and Hook Sectors
Fisheries Policy & Management Coordinator, CCCHFA
210-E Orleans Road, North Chatham, MA 02650
508.945.2432 (phone)
508.945.0981 (fax)
eric@ccchfa.org

From: <captainhappy@optonline.net>
To: <MultsAmendment16@noaa.gov>; <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 4:41 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

My name is Dave Aripotch, I have been a fisherman since 1974, and am owner/ operator of a 73' dragger. I fish out of Montauk, N.Y.

With regard to Potential Sector Contributions, I feel sectors are going to consolidate the what's left of the fishing industry to nothing, but if the Enviros are set on cramming them down our throats, then it should be option 1, Landing History Only.

I am totally against sectors, if anything they should go right to ITQ.

Mortality Controls for the common pool? For the Southern New England Groundfish fleet, Instead of 3:1 maybe something along the lines of 365:1 . Seeing as winter Flounder is closed, what's the difference? Obviously this is ridiculous. Why not go back to 1:1? Other than if a few Codfish show up , who can go burn a day, + \$ 2.00 =a gallon fuel for 250 lbs of yellowtail?

This differential counting is ridiculous. It hasn't worked yet, why keep on with that insanity?

I also don't feel that drop chains are called for in Southern New England. Ms. Kurkul said in the NEFMC meeting in Feb. 2009 that NMFS has never done this without the science to back it up, and for this drop chain, there is no science to prove its claims and will not help the winter flounder fishery mortality at all. You can hear it on the audio tape of that meeting. <http://www.nefmc.org/actions/index.html> Feb 9-11 audio, tape # 8, @ 2:13:50.

The drop chain will destroy our few remaining fisheries in Southern New England, all the while not helping the flounders because they're not in the area we're whiting and squid fishing in. The Observer data I believe will show that winter flounder are not being caught or discarded in the mixed trawl fishery.

Sincerely

Dave Aripotch

P.O. Box 1036

Montauk, NY 11954

From: "stephen norberg" <marlin10009@yahoo.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 4:39 PM

I would like to let the new england fisheries managemant council know that I am against the privatization of the public fisheries resource.that is what appears to be the effect of amendment 16. I dont think any of the ace quota alternatives in relation to the formation of sectors fairly distribute the tacs on species! you have let the people down.Awarding quota to vessels that caught the most fish during pre selected dates was nothing more than political manuevering to insure the dominance of bigger more horsepower boats while at the same time smaller owner operated boats are going out of business.Not only has this destroyed the smaller ports ability to survive it goes directly against the national standards clause that fishery management councils will take into account the social and economic impacts of fishery actions.I support the idea of sectors and local area management butt only if that includes open access vessels and community based quotas that come off the top of tacs and let the community have a place for young people to enter into the fishery.

sincerly yours
capt. Stephen F. Norberg
F/V Corrina Marthas VInyard Ma.

From: "allyson jordan" <eatlocalfish2@yahoo.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 3:27 PM
Subject: DEIS for Amendment 16 to the Northeast Multispecies FMP

Jordan Maritime Ind.,LTD.
F/V Theresa & Allyson
Jordan Marine Inc.
F/V Jamie & Ashley
2 Jodrey State Pier
Gloucester MA 01930

Patricia Kurkul, Regional Administrator
national Marine Fisheries Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930

Dear Ms. Kurkul,

This letter is to provide my comments on the DEIS for Amendment 16 to the Northeast Multispecies FMP.

First, my preference would be to urge the Agency to prioritize ITQ's over sectors as soon as possible. The Sector strategy to "help" change the way the fishery is managed is being driven by Non Government Agency's that claim to be non-profit. These private organization's are being funded by foundations that have no idea about fisheries nor any financial investment. These NGO's just have greed for money from wealthy foundations to help their own special interests. We have systems in effect at present for monitoring, these organizations are pushing for over the top dock side monitoring, on board camera monitoring where the cost would be deferred to the vessel of an estimate of \$20,000.00 per boat to be a part of a sector. As a boat owner that cost is unattainable, for the fix cost increase to keep a vessel safe and updated has sky rocketed, while fish prices at a low because of the world economy. At the end of the year there is barely enough money to take care of maintenance. Allowing these wealthy organizations to drive fisheries management this way is like giving a greeter at WallMart the Chief Neurosurgeons job at Massachusetts General.

Sectors have so many uncertainties, it makes it difficult to make a decision on joining one. The predictions of the TAC's that will be given to the sectors are extremely low, as the landing history given by NMFS is in many cases not as accurate as the dealer landings- and the no option to dispute your history for another year is completely unacceptable.

The Northern Groundfish Fishery has not landed nor exceeded the TAC I believe for ever. This is a problem- we are discarding marketable fish. We are told we are overfishing- then we find out two years later the Monkfish Fishery was totally rebuilt two years ago when the new restrictions went into effect- now because of law also being driven by the wonderful wealthy NGO's we have to start the process all over to change the restrictions.

My preference for Allocation in Amendment 16 would be for ITQ's as soon as possible, based on 100%

history- Option 1. We have been fishing the same areas and ways for a number of years and do not want to get species we historically and presently can not access. I also support our history should be taken from the years 1996-2007. We chose to stay with our industry in Groundfish- history should be the way we get an allocation as in other fisheries. The formulas the council comes up with are over complicated with much room for error. Formulas for allocations are completely unnecessary- 100% history is the only option.

I urge you to use the money that NMFS just received to put it towards the observer program. Dockside monitoring should be covered by the current Mandatory Dealer Reporting. By law dealers are responsible for reporting all fish purchased and they do. As a boat owner- I am at the dock when offloading and receive a weigh out slip that you then compare to your sales slip after selling the product that you also confirm with your captain to make sure your catch is all accounted for and then we have the trip reports that are also mandatory.

As far as the common pool- my preference is for option 3A- all common pool options will be a disaster- the options that involve the complicated(worse than present) differential DAS areas are totally unacceptable.. Hard TACS are even more unacceptable if that is possible! Hard Tacs will do nothing but increase discards, most likely marketable discards-will ruin markets that are currently in the dumpster.

I urge you to stop managing fisheries by threats of law suits because of the way the law is written. These NGO's have been operating the same for many years- as soon as you finish with a new restrictions they want more. I urge you to set ACE's at a reasonable level, not one that will please the lawyers from the NGO's waiting to pounce. One that will allow us to harvest and eliminate marketable discards. The Groundfish Fishery has drastically changed during the past 10 years. People whom have remained in this fishery have worked hard at working with new and constantly changing regulations, trying to work with management and the process- just trying to remain in business and contributing to the community. It is time we managed the fish and allow harvesting for marketable product.

Thank you for considering my views.

Allyson Jordan

From: "tom osmers" <tom.osmers@gmail.com>
To: <MultsAmendment16@noaa.gov>
Sent: Monday, June 08, 2009 4:06 PM
Subject: ATTN: NMFS/NOAA

To: New England Fisheries Management Council
From: Tom Osmer, Martha's Vineyard Sector

Comments:

Unfortunately, none of the options that deal with access and allocation are a great help in the preservation of the small fishing community.

We strongly urge the council to support the Community Fishery Association concept that was endorsed by the Ground Fish Advisory Committee and include CFA's in amendment 16.

Tom Osmer
PO Box 1087
West Tisbury Mass.
02575

From: "Susan Murphy" <Susan.A.Murphy@noaa.gov>
To: "Douglas Christel" <Douglas.Christel@noaa.gov>
Sent: Monday, June 08, 2009 1:25 PM
Subject: [Fwd: Fw: Cod & Haddock regulations]

----- Original Message -----

Subject: Fw: Cod & Haddock regulations
Date: Mon, 08 Jun 2009 13:02:18 -0400
From: Pat Kurkul <Pat.Kurkul@noaa.gov>
To: 'Susan.A.Murphy@noaa.gov' <Susan.A.Murphy@noaa.gov>

From: M. Emid LaClaire <emid@som.umass.edu>
To: pat.kurkul@noaa.gov <pat.kurkul@noaa.gov>
Sent: Mon Jun 08 12:57:09 2009
Subject: Cod & Haddock regulations

Dear Director of the National Marine Fisheries Service Patricia Kurkul,

The Cod, Haddock and Pollock fishing along the New England coast is the best it has been since I first started fishing deep sea in 1975. I believe that the regulations that are now in effect are the reason and to regulate the recreational fishermen further is of no use. The focus of the NMFS In my humble opinion would be better aimed at the commercial bycatch problem. Dragging up and killing tons of fish(the Atlantic Halibut for example) that are to be returned to the sea dead does no one any good stop the draggers or make them keep all the fish that they kill. Please leave the recreational laws alone as they seem to be doing just fine. Further changes would be detrimental to the charter boat and tourism trade along the entire coast.

Mathew E. LaClaire
Leverett Ma. 01054

413-367-9436

PS: If it ain't broke don't fix it !

