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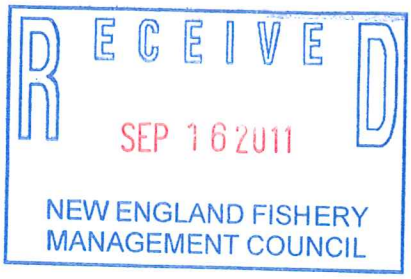
ASSOCIATED FISHERIES OF MAINE
Po Box 287 South Berwick, ME 03908 207-384-4854

September 15, 2011



Mr. Rip Cunningham, Acting Chair
New England Fishery Management Council

VIA ELECTRONIC MAIL:

Dear Rip:

I write, on behalf of Associated Fisheries of Maine with respect to the pending **"initial discussion of 2012 Council management priorities"** scheduled for September 26, 2011.

We request that the Council support the August 30, 2011 motion of the Habitat Committee: *To recommend that the Council prioritize completion of the Omnibus Habitat Amendment, including analysis of the groundfish closures, year-round and rolling, and to devote time at upcoming full Council meetings to reconcile changes to groundfish mortality closures with the Omnibus Habitat Amendment (5/0/0)*

We agree that the existing habitat closures should be re-defined in ways that provide better protection to essential fish habitat, and to provide opportunities for both the scallop and groundfish fleets to achieve high catch per unit of effort and thereby reduce area swept. It is essential that the Council document and acknowledge the significant reductions in area swept that have already occurred as a result of scallop rotational management and the 38% reduction in days absent that have occurred in the groundfish fishery from 2007-2010.

Groundfish sectors are facing crippling monitoring costs, and we need the Council to develop a workable alternative to handing the industry a bill that it cannot pay.

We anticipate that the Council will soon receive a list of recommendations from groundfish sector managers for needed improvements to the sector management system, and we request that the Council prioritize a mechanism to address those recommendations, and especially any recommendations that would increase the possibility of achieving optimum yield in the fishery.

With respect to Amendment 18, we believe that the Council could best achieve the goal of a diverse groundfish fleet by alleviating the monitoring burden, by providing more fishing opportunities through access to both inshore and offshore fishing grounds, and by making improvements to assure the success of sector management. This would be a far more efficient use of limited council resources than a social engineering effort that will definitely be divisive and almost certainly include input controls. And, any strategy based on input controls will diminish the ability to achieve optimum yield at a time when increasing our ACE utilization rates is our top priority.

We also wish to see the Council address how it is represented at the TMGC, with more industry representation to better mirror the Canadian composition of the TMGC.

As always, we appreciate the Council's consideration of our views.

Sincerely,

M. Raymond
Maggie Raymond

c: Council, CBK, TN, PMF (9/19)