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April 15, 2013

Mr. John K. Bullard, Regional Administrator
NOAA Fisheries
55 Great Republic Drive
Gloucester, MA 01930

RE: Comments on the Proposed Rule for NE Multispecies Framework
Adjustment 50

Dear Mr. Bullard:

On behalf of the Northwest Atlantic Marine Alliance we submit the following comments on the rule proposed by NOAA Fisheries for Framework 50 (FW 50) to the Northeast Multispecies Fishery Management Plan (FMP) for groundfish (NOAA-NMFS-2013-0053).

We are concerned that the proposed reductions in catch limits under FW50 will not achieve its goals without first implementing a suite of safeguard measures. Severe quota cuts will exacerbate fleet consolidation and pending no safeguards in place, lead to concentrated levels of fishing pressure on inshore areas that the ecosystem cannot sustain. Furthermore the absence of safeguards will disproportionately displace small and mid-scale fishing businesses.

Scale of Fishing Pressure on Inshore Areas

We hear from a large number of commercial fishermen around New England that the scale of fishing pressure on discrete inshore areas must be addressed because in many cases the fishing pressure is too great for the ecosystem to withstand. The result is both a depleted ecosystem and displaced community based fishermen who have historically depended on inshore areas for a living and still do to this day.

The majority of New England commercial fishermen have sacrificed over the past 15-20 years to rebuild in areas, including the Western Gulf of Maine, that contain critical habitat for multiple life stages, including juvenile and spawning fish. Prior to 2010 there were positive signs that the ecological commitment was paying off.

Since the implementation of Amendment 16 to the groundfish FMP the bulk of safeguards to protect both inshore fish stocks as well as small to medium-scale fishing businesses were lifted. The removal of safeguards assumed that it did not matter who fished or where fishing took place, and whether the fishing pressure and scale was appropriate for that particular discrete ecosystem. We strongly believe that in order to comply with the Magnuson-Stevens Fishery Conservation and

Management Act it the Agency must ensure scale of fishing matches the scale of fishing from which fish are removed, and that it does matter *who* fishes and *where* fishing takes place.

Over the past three years in the Western Gulf of Maine a scale of fishing pressure has exceeded that which the ecosystem can sustain. Fishermen who depend on this area saw nearly all of the quota that was set for the region from Eastport, Maine to Provincetown, MA get caught in just two 10 by 10 nautical mile squares (2% of the area of Gulf of Maine). We know this is not an isolated case. We know similar situations are occurring Southeast of Block Island and we can look to the Downeast Maine area where mismatch of scale has resulted in depleting cod sub-stocks that have been extremely slow to rebuild.

Moving forward

In the short-term safeguards must be put in place to reduce the scale of fishing pressure in the Western Gulf of Maine. NMFS should consider both trip limits and seasonal inshore/offshore area designations in order to return the area to a scale appropriate level.

In the long-term additional safeguards must be put in place to ensure that fleet consolidation does not result in; 1) scales of fishing that adversely impact discrete ecosystems, and 2) disproportionate impacts to small and medium size fishing businesses. Please see NAMA's policy recommendations offered to the New England Fishery Management Council (enclosed).

Conclusion

Quota limits alone are insufficient to achieve management goals of rebuilding fish stocks and supporting a more diverse fleet. Short term and long term safeguards to protect inshore areas as well as small and medium scale fishing businesses will support healthy fishing communities in the long run as the fish stock stocks' health improves.

Sincerely,



Brett Tolley
Community Organizer