

I am unable to attend and am sending these comments in advance of this Thursdays meeting.

Dear Participants of the Groundfish Accumulation Limits Workshop:

I am writing to ask that you take actions to prohibit consolidation/excess accumulation within the North East Multi Species Groundfish Fleet and in doing so allow smaller vessels to profitably exist in the industry.

NOAA has taken appropriate steps to reserve some allocation for smaller vessels through creation of the state permit banks. I ask that you acknowledge this lead and make permanent steps to not overlook the smaller vessels.

NMFS NERO Statistics of Groundfish Landings & Revenue by Vessel Size, 2009 & 2010 shows that vessels > 50' have landings up 8.4% and revenue up 21.5% while vessels <=50' have landings down 51.7% and revenue down 34.2%. The current system rewards larger vessels that can pay higher prices to lease/buy with no limits on how much allocation they can obtain. This creates major problems for smaller vessels that historically fish summer months and during those months obtain a lower market price for their catch.

My hope is that you can find an approach that ends the disparities that exist today.

Sincerely,

Brian Pearce

F/V Gretchen Marie

No. Yarmouth, ME