Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Re: Atlantic Sea Scallop Amendment 21 Public Hearing Comments

Dear Director Nies,

I would like to thank you, your staff, and the entire NEFMC for devoting the time and energy necessary to address the needs of the fishermen who participate in the Northern Gulf of Maine scallop fishery. My name is \_\_\_\_\_\_\_\_\_ and I fish on the fishing vessel \_\_\_\_\_\_\_\_\_\_\_\_\_\_ out of \_\_\_\_\_\_\_\_\_\_\_\_\_\_.

In Amendment 11, the NGOM permit and management area was established to preserve access and opportunity for the small boats of northern New England. With the return of scallops to those waters, the regulations and rules governing access and sustainable management proved insufficient and your quick action through Framework 29 helped protect the fishery for an entire generation of inshore fishermen in Maine, New Hampshire, and Massachusetts.

As a scallop fishermen and NGOM Permit holder, I am excited to see the scallop fishery returning to Maine waters and believe the work done by the scallop committee and council through Amendment 21 has set up a fair and equitable way to ensure shared success, growth, access, and investment in the future of the scallop fishery for all boats in the NGOM. Below are my comments regarding the alternatives within A21.

**6.1.1- NGOM Management Measures:**

I support the preferred alternative of incorporating the NGOM into the flow chart and including the NGOM exploitable biomass into the overfishing limit as it creates some level of consistency.

**6.1.2 NGOM Allocations:**

I support the preferred alternative from The Council. Alternative 2 Option 2 creates a NGOM set-aside trigger of 600,000 pounds; pounds over the trigger would be split 25% for the NGOM set-aside and 75% for the NGOM APL up to 3 million pounds, then 5% for the NGOM set-aside and 95% for the NGOM APL. This is a middle of the road allocation split which will allow for shared opportunity and create incentives for all parties who wish to fish in the Gulf of Maine to manage it for growth. The NGOM cannot be treated like other offshore fishing grounds with heavy exploitation and then periods of inactivity. Our NGOM permits can only fish in this area of the ocean, so allowing a trigger of 600,000lbs gives a reasonable allowance for the small boats, and then the 25/75 split allows for shared growth. This option is a good compromise and I support it.

**6.1.3 Monitoring directed scallop fishing in the NGOM:**

I support alternative 2 which will create an industry funded observer program for the NGOM. Good stewardship requires accountability and the NGOM fishermen are dedicated to being good stewards of this resource.

**6.1.4 Support Scallop Research Using Scallops from the NGOM**

I support Option 4 which would allocate 25,000lbs of the NGOM allocation to increase scallop RSA and support RAS for the overall scallop fishery. While this may be a lot of pounds of scallops in years when the biomass is low, I understand that using a set number of pounds is an easier way to allocation research pounds and believe that good data is important to manage this fishery for the future.

**6.1.5 NGOM Fishing Season:**

I support the no action alternative for the NGOM fishing season. We do not need to establish limits on when or where vessels can fish at this time as there are no issues that currently exist. Changing the current regulations may have unintended consequences when it comes to gear conflict and I believe that through frameworks or other actions the council can quickly address any problems.

**6.1.6 Cumulative Maximum Dredge Size.** (choose one)

* Alt 1. No action (preferred alternative) No change
* Alt 2: Limit combined dredge width to 10.5 feet
* Alt 3. Limit combined dredge width to 15.5

Thank you for considering my comments and for helping protect the future of the Gulf of Maine scallop fishery for all fishermen.

Sincerely,

Name

F/V