Thomas A. Nies, Executive Director,

New England Fishery Management Council,

50 Water Street, Mill 2,

Newburyport, MA 01950;

4/15/2018

**RE: Public scoping comments regarding Amendment 21 to the scallop fishery management plan.**

Dear Executive Director Nies,

Thank you for the time and commitment you and the New England Fishery Management Council have put into addressing the issues facing the Northern Gulf of Maine scallop fishery. As you are well aware, loopholes in the regulations put the health and future of this fishery at risk for Maine small boats. The response from the Council in Framework 29 was instrumental in protecting the resource and the fishermen, like me, who rely on the NGOM fishery as an important part of our businesses. I understand that Framework 29 was a Band-Aid, and that this current Amendment 21 is an opportunity to create long-term regulations, but there was significant effort that went into Framework 29 and I firmly believe that we should rely on the outcomes of that process to inform this Amendment. As such, please accept the following comments on Amendment 21.

Pick and choose the issues that you find important to include below.

**An allocation split between the Limited Access and General Category:**

I strongly support status quo (70,000lbs and a 50/50 split of remaining allocation dedicated to general category fishing in the NGOM) for the allocation of the scallop resource in the Gulf of Maine. Status quo is working and is the simplest way to move this amendment forward in a timely manner. The council spent significant energy and resources last year developing this allocation split and there was abundant public input in that process.

**Consistent Gear Restrictions:**

The Gulf of Maine is a unique area for the scallop resource and while there is potential, we have to recognize how different this inshore habitat is. I think examining what consistent gear restrictions would look like within this area now would be an important thing to do for the future of the resource and habitat.

**Should the Council limit the ability to turn incidental permits and Gen Cat permits into NGOM permits?**

There aren’t a lot of scallops within this area right now and as there is concern about increased effort in the Gulf of Maine I think it would be appropriate to examine limiting the movement of permits into the fishery, especially incidental permits that have never historically fished in the Gulf of Maine.

**Spread the availability of catch throughout the year (trimester TACs)**

**Allocate portions of the catch across sub-regions of the NGOM**.

While spreading the catch of scallops throughout the season and the region would be beneficial for some, the biomass is too small to support a redistribution seasonally and we don’t have the science to actually or appropriately distribute catch throughout the Gulf of Maine. If the council would like to explore these measures, they should look into what kind of data would need to be collected including increased surveys, potential for gear conflict, and safety.

**Develop set-asides to support research and monitoring.**

I strongly supports creating a set-aside for research and monitoring as it is essential to have good science and accountability to ensure a sustainable and profitable fishery in the Gulf of Maine. We need more surveys within the data-poor area Gulf of and an accountable fishery to ensure the resource is managed effectively.

**Change of the NGOM boundary**

I emphatically do not support moving the NGOM line. This is a push from the limited access boats to get access to what little scallop resource there currently is in the Gulf of Maine and there is no real rational for changing the southern boundary.

I want to thank you again for the time and effort the council has put into creating effective solutions that create a sustainable scallop fishery that works for a diverse set of boats. The Northern Gulf of Maine is a miniscule part of the fishery, but it is very important to those of us from Maine, New Hampshire, and Mass who make money on this local fishery.

Thank you

NAME

FV

Home Port: