

# ADDITIONAL CORRESPONDENCE

**XII Northeast Fishery Sector, Inc.**

67 Creelman Drive

Scituate, MA 02066

Mr. Tom Nies, Executive Director

Dr. John Quinn, Chairman

New England Fishery Management Council

50 Water St., Mill 2

Newburyport, MA 01950

April 3, 2019

Dear Mr. Nies and Dr. Quinn,

We are writing with a deep and growing sense of urgency concerning the impending deadlines for public comments and Council action on Amendment 23. We do this due to the still unknown impacts of the economic catastrophe being caused by the COVID 19 pandemic.

As you are aware, we have been outspoken in our assertion that the cost of observer coverage envisioned in the preferred alternative is completely unaffordable to small, family owned fishing businesses throughout the Northeast. We have argued that ex-vessel groundfish prices have failed to keep pace with the cost burdens imposed by sector management.

Events of the past several weeks have reinforced those concerns. Due to factors such as restaurant closures, elimination of social and business gatherings and uncertainty over income security, the market for seafood products has all but collapsed. Fishermen have been requested by their dealers not to land fish without first determining whether processing and market capacity exists. Even with these constraints, prices often fail to cover trip costs.

The analysis that provided the economic rationale used by the Council in debating and selecting A23 alternatives clearly did not consider market disruptions of this magnitude. Moreover, the cascading wave of unemployment claims and business closings render any projections based on historic performance totally unreliable.

We are beginning a new fishing year facing additional increases in the cost of At Sea Monitoring. Proposed rates are increasing vessel costs to \$750 to \$800 per day at sea. Were it not for the current reimbursement program, our boats already be tied up on a permanent basis.

For these reasons we are strongly urging that the Council postpone any further development actions on Amendment 23 until such time that our economy stabilizes, and we can accurately evaluate the costs and benefits of monitoring in that context.

Thank you. Northeast Fishery Sector XII

Kevin Norton, President



Phil Lynch, Vice President



Frank Mirarchi, Treasurer



**From:** Michael Pierdinock [<mailto:sbcbamp@gmail.com>]

**Sent:** Sunday, April 05, 2020 4:20 PM

**To:** Tom Nies <[tnies@nefmc.org](mailto:tnies@nefmc.org)>; Michael Pentony <[michael.pentony@noaa.gov](mailto:michael.pentony@noaa.gov)>; [NMFS.COVID-19@noaa.gov](mailto:NMFS.COVID-19@noaa.gov)

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**Subject:** Corona Virus Impacts to the Recreational Anglers & For Hire Fleet

Mike/Tom:

On behalf of the SBCBA that represents the for hire fleet and recreational anglers that fish our Massachusetts state and federal waters beyond, the corona virus has shut down the for hire fleet with haddock trip cancellations associated with the opening April 15th as well as the May 18 black sea bass trips. We are also having problems with marinas having staff available to have our boats ready to be placed in the water for the upcoming season. We are concerned the entire upcoming season may be at risk with clientele having lack of funds to go on for hire trips. Many captains have already used their clienteles deposits to pay for insurance, dockage and vessel repair and are at further risk if things don't turn back to normal soon. The state and federal financial relief to obtain unemployment insurance as well as SBA loans is a step in the right direction but depending upon the duration of restrictive measures many may just close shop.

Prior to the state/town restrictions a OUPV 6 pack vessel could leave the dock and follow the CDC social distancing measures, washing hands and surfaces and other measures but in reality few were leaving the dock. Party boat operators have no options unless they limited the trip to ten or less people in total on the boat that financially makes no sense. If one follows the CDC measures and if there was a cost effective mechanism to corona test all essential employees and/or patrons with a 15 minute corona test daily the comfort level would be such that it would then be safe to leave the dock.

We need to maintain the ability for recreational anglers, clammers, etc to fish and put food on the table. There have been many inquiries with those concerned that ability to do such may stop. Follow CDC recommended measures when conducting such activities.

There are no MRIP interviews presently being conducted and few are fishing other than select recreational anglers. We hope that the fall season can be opened for those species where there are fall closures such as black sea bass, summer flounder, etc. This will provide us some financial relief and would provide a mechanism for recent MRIP fall landing data for species of concern that is lacking in our waters due to ongoing fall closures.

We anxiously await the details concerning financial relief for the for hire fleet for losses greater than 35% that will be administered by NOAA later in the year.

Be safe, be healthy and maintain the CDC distances and implement the CDC measures so we can get back in running in early May or sooner.

If you have any questions or comments please email or give me a call.

Thanks

***Capt. Mike Pierdinock***

SBCBA, President

(617) 291-8914

Stellwagen Bank Charter Boat Association

P.O. Box 1230

Marshfield, MA 02050

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## New England Fishery Management Council

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John F. Quinn, J.D., Ph.D., *Chairman* | Thomas A. Nies, *Executive Director*

April 10, 2020

Mr. Michael Pentony  
Greater Atlantic Regional Administrator  
National Marine Fisheries Service  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mike:

Today, my staff electronically sent a formal submission of Framework Adjustment 59 to the Northeast Multispecies (Groundfish) Fishery Management Plan, including the Environmental Assessment and associated Appendices, to your staff in the Sustainable Fisheries Division at the Greater Atlantic Regional Fisheries Office.

After reviewing the comments received by my staff on April 9, 2020 on the preliminary submission sent on March 10, 2020, the framework document has been updated to incorporate the changes requested.

Please contact me if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Nies".

Thomas A. Nies  
Executive Director