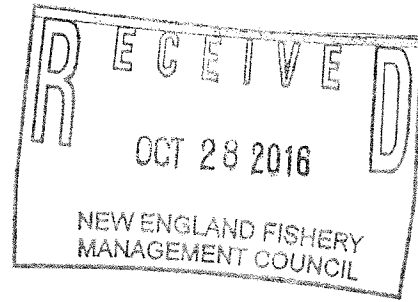


# CORRESPONDENCE



October 10, 2016

Dear Chairman Quinn, Executive Director Nies and members of the Scallop AP and Committee:

I am writing to ask you to ensure Northern Gulf of Maine (NGOM) scallop management corrections are kept on the list of 2017 scallop priorities.

The Scallop Committee voted on October 17 to include NGOM fixes in its 2017 priorities. I find it unsettling there was any debate as to whether or not it would be included. *There are currently no measures in place to control Limited Access fishing mortality in the NGOM.* This year LA boats took approximately 293,000 pounds from an area with a TAC of 70,000 pounds. This is a serious problem that threatens the viability of both the resource and the fishery.

I recognize the NGOM has not been a priority in the past, and as a result many people may be unfamiliar with its history and management. I'd like to highlight a few points:

- Amendment 11 established the NGOM as a separate management unit. It established measures to prevent overfishing by General Category vessels but failed to implement similar measures for Limited Access vessels. At the time it was suggested LA vessels would not fish in the NGOM.
- The NGOM TAC has its own separate survey, and the NGOM TAC is based on that survey. But because the TAC applies to only GC vessels, LA vessels can take an unlimited amount of scallops above and beyond it.
- The NGOM survey is not factored into the ACL for the scallop fishery.
- Some have suggested that LA vessels are not overfishing because "they're using DAS, which are calculated based on the status of the resource". But DAS are allocated based on the status of the resource *outside the NGOM*. As noted above, the NGOM is not factored into the ACL.
- The OFL flowchart handles the NGOM the same way it does state water landings: it ambiguously inserts them between the OFL and the ABC and then immediately removes them. This smoke and mirror move gives the appearance the NGOM is somehow considered in the ACL. It is not.
- Amendment 11 established the NGOM as a separate management area. Therefore the Council and NOAA Fisheries have an obligation to prevent overfishing of the NGOM. Right now, they can prevent overfishing by General Category vessels, but they have *no means to prevent overfishing by LA vessels*.
- Some have suggested extending the deck loading provision into the NGOM would solve the problem. It will not. In April the state of MA began enforcing their state regulation prohibiting possession of more than 50 bushels of shell stock in state waters (which roughly follow the

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WWW.DOWNEASTDAYBOAT.COM

demarcation line), and LA vessels remained in the NGOM until the last day of fishing (May 13) despite being unable to deck load. The only people suggesting this will solve the problem are those who like the status quo, and the status quo is not responsible management.

- PDT members have noted the “awkwardness” of generating a TAC based on the most recent survey when the LA fleet can harvest an unlimited amount of scallops above and beyond it. Awkward is an understatement. This is not a question of allocation, nor is it simply a question of fairness. The current management regime in the NGOM does not pass the straight face test.

The NGOM was created to preserve access to the scallop resource for small boats in Northern New England that had traditionally fished there when the resource was abundant. It cannot and will not fulfill its purpose until measures are put in place to control the fishing mortality of LA vessels. The beds off Cape Ann and Stellwagen could have sustained the NGOM fishery for many years. Instead, they are well on their way to being wiped out. I applaud the Scallop Committee for recognizing the severity of the problem and including NGOM fixes in its list of 2017 priorities, and look forward to working to help correct NGOM management in the months ahead.

Yours truly,



Togue Brawn  
Downeast Dayboat, Inc

**Sherie Goutier**

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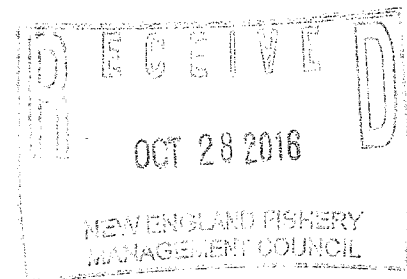
**From:** Francesco Paul Vitale <fvangelarose@comcast.net>  
**Sent:** Thursday, October 27, 2016 5:40 PM  
**To:** comments  
**Subject:** Chairman Quinn, members of Scallop AP and Committee. NGOM management priorities

Chairman Quinn, members of Scallop AP and Committee,

I'm writing to ask you to keep NGOM management corrections on the list of priorities for 2017. As a small boat/ Day boat fisherman this issue is very important to my fishing operation. I have mainly been a Groundfisherman, and have few option to diverse into other fisheries. Scalloping is one, but I'm limited to fishing only in the NGOM scallop fishery. Many small boat fishermen like myself are in the same situation. The NGOM management corrections need to remain a priority.

Thank You Francesco Paul Vitale

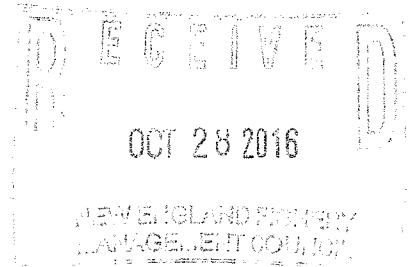
F/V Angela & Rose



**Sherie Goutier**

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**From:** Josh Trundy <jtrundy86@hotmail.com>  
**Sent:** Thursday, October 27, 2016 7:38 PM  
**To:** comments



Dear Chairman Quinn and members of the Scallop AP and Committee:

I'm writing to ask you to support the Scallop Committee's October 17th motion to include Northern Gulf of Maine (NGOM) management corrections in the 2017 scallop priorities.

For seven years, Maine fishermen and other stakeholders have been asking the Council to correct management inconsistencies that threaten the viability of the NGOM fishery and the resource itself. Current measures were established as a "placeholder" for when scallops returned. They have returned, and there are currently no measures in place to control Limited Access vessels' effort in the area. This is not responsible management.

I bought a NGOM permit because I want to be able to make a living as a fisherman, and having access to more than just one fishery is important to my survival. It's my understanding that the NGOM management area was created because the Council wanted guys like me to be able to continue to fish for scallops in the Gulf of Maine. Right now, it's entirely possible for LA boats to wipe out each and every bed that starts to recover in the NGOM. How is that right? I know fixing things won't be easy, but it's long past time we start the process.

Thank you for doing what's necessary to ensure NGOM management fixes are a top priority in 2017.

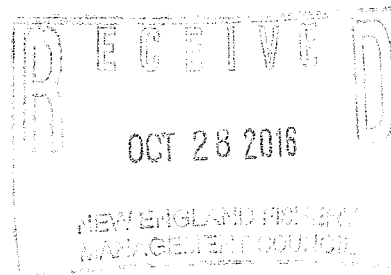
- Josh Trundy  
F/V Knot Exactly  
Permit # 233846

Sent from [Outlook](#)

**Sherie Goutier**

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**From:** Kristan <kbporter5@roadrunner.com>  
**Sent:** Thursday, October 27, 2016 10:14 PM  
**To:** comments  
**Subject:** NGOM



Dear Chairman Quinn

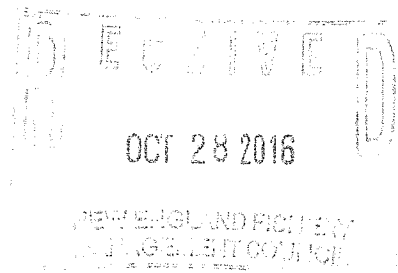
I am writing to request that the NGOM Scallop Fishery be included in the priorities for 2017. The inconsistencies in the way the NGOM fishery is managed need to be addressed as soon as possible. Even if the process starts now there will be no resolution until the 2018 season. The concerns about potential overfishing were raised years ago. There is no good reason to kick this can down the road any longer. The participants in the NGOM deserve to have a management plan that is complete so sound business decisions can be made.

Thank you  
Kristan Porter  
Cutler, ME  
Permit # 152057

**Sherie Goutier**

---

**From:** Robert Odlin <rodlin1@maine.rr.com>  
**Sent:** Friday, October 28, 2016 7:22 AM  
**To:** comments  
**Subject:** Support the motion



Hello  
I support the Councils action to include NGOM scallop on the meeting Agenda

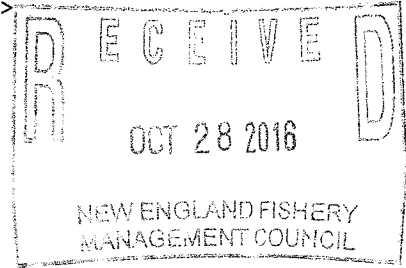
Need to keep Gen Cat vessels out of NGOM

Thanks  
Rob Odlin  
F/V Maria and Dorothy  
250527

**Sherie Goutier**

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**From:** Jim Wotton <cranberryislandlobster@yahoo.com>  
**Sent:** Friday, October 28, 2016 10:23 AM  
**To:** comments  
**Subject:** 2017 Priorities



Dear Chairman John Quinn,

I'm writing to ask you and the Council to ensure that the NGOM remains a priority to be addressed in 2017.

I realize that the NGOM is a very small portion of the overall scallop fishery but it is very important to me and the other small boat guys that need access to a variety of fisheries to remain profitable.

The NGOM has been ignored until just recently when large landings by the LA fleet drew attention to the area. Now is the time to ensure that the NGOM is protected and ensure that it remains true to its purpose; provide access for the small boats of the Gulf of Maine.

Thank you for your time and effort on the very important issue.

Jim Wotton

Owner and operator of F/V Overkill #151564

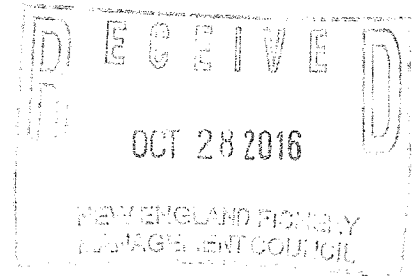
Friendship, Maine



**Sherie Goutier**

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**From:** Ben Crocker Jr <fvcleansweep@gmail.com>  
**Sent:** Friday, October 28, 2016 10:39 AM  
**To:** comments  
**Subject:** Northern Gulf of Maine Scallops



Dear Chairman and other Council members

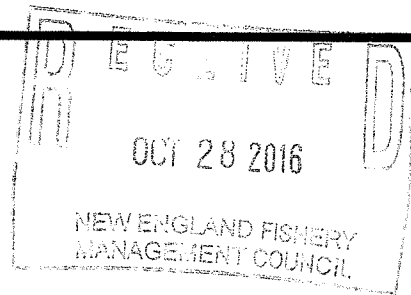
Im writing to ask you to keep NGOM management correction on the list of 2017 priorities. The NGOM could be a sustainable, profitable fishery for a diverse fleet of boats in northern New England, but that won't happen until the council closes dangerous loopholes that threaten both the fishery and the resource itself. I can't imagine why anyone would suggest fixing these problems is anything other than a top priority. I know it's not going to be easy to come up with a solution, but that's all the more reason we need start the process soon. We should have started the process years ago. If we had perhaps the scallops may have not been wiped out on Jefferys last summer and there would have been good fishing for years to come. Let's not let the same thing happen again.

Thanks for letting me comment  
F/V CLEAN SWEEP  
Ben Crocker Jr

## Sherie Goutier

---

**From:** Julie Miller <jamiller54@roadrunner.com>  
**Sent:** Friday, October 28, 2016 11:03 AM  
**To:** comments  
**Cc:** togue Brawn; ben Martens  
**Subject:** Prioritize NGOM scallops



Good morning Council Chairman Quinn, Executive Director Nies, the Scallop AP and Committee members:

I am taking this opportunity to write to you once again concerning the the absolute necessity to support prioritizing the much needed fixes to the current management of the Northern Gulf of Maine scallops for 2017. I had sent an email earlier this month outlining much of the same rational that I have included below. One of the points that I failed to include earlier was that many of the boats that hold a NGOM permit and deserve/hope to benefit from the proper management of this resource are many times owner/operator and or family owned and operated boats. This portion of the fleet was once the backbone of our fishing heritage and deserves to be recognized as an important portion of the fleet that should be preserved. By taking the proper action it is one way for this Council to ensure that a diverse fleet can still exist. Most of these vessels not only support the fishermen that are on board them, but they bring back the economic impact from being able to participate in another fishery that benefits the towns that they live in as well the various ports in which they choose to land. This is a welcome alternative to what has been taking place for many years where the economic benefits are concentrated in one geographic area. The management oversights have existed for many years and have reached the point that these inconsistencies can no longer be ignored. We must seek to improve the management of this important resource for the benefit all user groups and the geographic areas that should potentially benefit from this resource. I don't believe that it is fair that the management measures that currently exist to protect the area don't apply to all vessels actively fishing that area. Last year the current TAC was exceeded by 400%, and depending on how much the LA vessels decide to participate in this area could easily be many times higher in terms of harvest, with no tool in place to limit their landings other than a TAC being met by a completely separate segment of the fleet. How can this be right? How can this not be a priority? Just based on this one fact alone this couldn't be considered sound management and there are other issues which also deserve to be addressed in order to consider this any semblance of proper management. I was a participant in this fishery many years ago in the same places where most of it took place last year, it wasn't properly managed then, the result of that has been that we have waited around thirty years for this fishery to rebound and now we still don't even have the ability to properly manage this fishery. It cannot be pushed down the road any further. This area took a hard hit last year and in my opinion it will be more than likely wiped out again this spring. The fishery off of Cape Ann, had it been properly managed, could have supported a sustainable fishery for years to come. If this had been the case the economic impact achieved by having a sustainable resource could have spread across not only all sectors that make up the fishery, but also geographic areas that are desperately trying to cling to a way of life while having few options to do so. Thank you for taking the time to consider my comments on why we have no other option other than to put the issues facing the NGOM scallop fishery at the top of the Councils 2017 priority list.

Sincerely:

Ira Miller

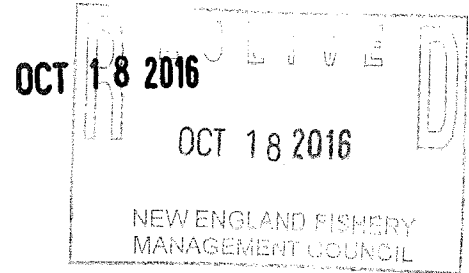
F/V Julie Ann

Permit # 231459



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
GREATER ATLANTIC REGIONAL FISHERIES OFFICE  
55 Great Republic Drive  
Gloucester, MA 01930-2276

Dr. John Quinn, Chair  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950



Dear John:

I am pleased to inform you that, on October 17, 2016, NOAA's National Marine Fisheries Service, on behalf of the Secretary of Commerce, approved Amendment 19 to the Atlantic Sea Scallop Fishery Management Plan (FMP). As you know, this amendment incorporates a specifications process into the FMP and changes the start of the fishing year from March 1 to April 1.

NMFS published a proposed rule to implement Amendment 19 on August 16, 2016, and we will publish a final rule soon to implement this amendment. Thank you for taking the time to address the issue of implementing scallop fishery allocations as soon as possible. Please contact me if you have any questions.

Sincerely,

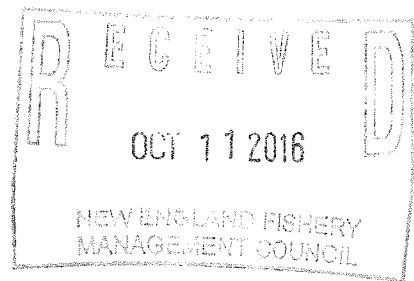
*for* John K. Bullard  
Regional Administrator

cc: Tom Nies



October 10, 2016

New England Fisheries Management Council  
Council Chairman John Quinn, Executive Director Tom Nies  
Comments@nefmc.org



Dear Chairman Quinn, Director Nies and members of the Scallop Advisory Panel and Committee:

We the undersigned Northern Gulf of Maine Scallop fishermen request that you make solving inconsistencies in the NGOM a top priority in the coming year. We also request that you set the FY2017 NGOM TAC at 95,000 pounds.

The PDT suggests around 400,000 pounds of scallops could be sustainably removed from the NGOM in FY2017. Unfortunately, there's no way to limit total removals from the NGOM. The NGOM TAC is a ceiling only for IFQ and NGOM boats. NOAA Fisheries has no current means to limit what LA vessels remove from the area, nor do they have a means to accurately determine what has been removed. This is a serious problem that threatens the sustainability of the NGOM fishery and the NGOM resource. We ask you to make its correction a top priority in 2017.

In the meantime, we must choose a TAC for the 2017 fishing year. The PDT has suggested 3 options and we request that you choose the middle ground of 95,000 pounds. As fishermen, it is unusual request a TAC be set *lower* than the highest level the PDT thinks is sustainable. We'd like to be able to set the TAC at the highest sustainable level. But we can't do that until dangerous inconsistencies are corrected.

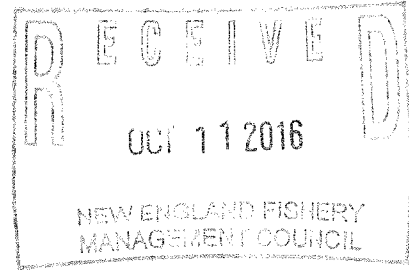
The NGOM was created because "the Council considered local access to the scallop resource by small vessels important to the continuation of fishing communities in Maine New Hampshire and Massachusetts" *Amendment 11 preamble*. If managed properly the NGOM could provide consistent, sustainable fishing opportunities for boats throughout northern New England. For that to happen, the Council **MUST** make correction of NGOM inconsistencies a priority in 2017. In the meantime, we believe a TAC of 95,000 strikes an appropriate balance between fishing opportunities in 2017 and years beyond. After last year's overage is deducted, that will put the effective TAC at around 75,000 pounds, which is roughly where it was last year. We'll keep our fingers crossed we can catch that TAC quickly so overall removals won't be higher than they were last year. And hopefully we won't need to rely on crossed fingers too much longer. Thank you.

Respectfully,

Kristan Porter F/V Brandon Jay Permit#150227  
Alex Todd F/V Jacob and Joshua Permit#242848  
James Wotton F/V Overkill Permit#151564  
Robert Odlin F/V Maria and Dorothy Permit#250527  
Joe Nickerson F/V Hayley Ann Permit#221740  
James West F/V First Impression II Permit#151983  
Joshua Trundy F/V Permit#151879  
Walter Jessiman, F/V Dream Catcher Permit#149896  
Kenneth Hunt, F/V Michelle & Lexi Permit#232055

Ben Crocker F/V Clean Sweep Permit#148781  
Dana Hammond F/V Nicole Leigh Permit#250716  
Justin Libby F/V Capt'n Lee Permit#242567  
Willis Spear F/V Old Speck Permit#151587  
Thomas Butler F/V Erica Jade Permit#241554  
Christopher Moore F/V Lori and Tammy Permit#250988  
Mike Love F/V Titan Permit#330774  
William Anderson F/V Eleanor Kathryn III 251772

*ip - 10/17/18*



October 10, 2016

Dear Chairman Quinn, Executive Director Nies and members of the Scallop Advisory Panel and Scallop Committee:

I am writing to ask you to make correction of NGOM management problems a top priority in 2017.

The NGOM was established in recognition of the fact that the area experiences wide fluctuations in abundance. The last time it "boomed" was over 20 years ago. We've learned a lot about scallop management in the past 20 years and we have the capability to prevent booms from going bust. It is therefore truly frustrating to be in the position we're in right now. It is irresponsible to claim the NGOM is protected by a conservative daily limit, a dredge size limit and a TAC *if none of those measures apply to the category of vessels with the greatest fishing power.*

The NGOM was created so small to mid sized vessels that had historically fished the area could continue to do so if and when the resource recovered. With appropriate management the recent bloom in the southern portion of the NGOM might have generated a long-term sustainable fishery. But that didn't happen.

Corrections to NGOM management problems are long overdue. I urge you to ensure they're prioritized in 2017.

In terms of the NGOM TAC, I am worried about the potential consequences of increasing the TAC prior to closing the loopholes that threaten the viability of the NGOM scallop resource and fishery. But the majority of the fishermen I work with support the 95,000 pound option. Although some preferred the status quo and some preferred the higher option, they were able to compromise on the middle ground, and I support their choice. I hope you will support it as well. Thank you.

Yours truly,

Togue Brawn

DOWNEAST DAYBOAT 48 UNION WHARF BOX 3 PORTLAND, ME 04101 207.838.1490  
WWW.DOWNEASTDAYBOAT.COM

jid 10/17/16

**Sherie Goutier**

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**From:** Jonathon Peros  
**Sent:** Wednesday, October 12, 2016 3:20 PM  
**To:** Sherie Goutier  
**Subject:** FW: Chinese scallop enhancement

**From:** Peter Hughes [mailto:PHughes@atlanticcapes.com]  
**Sent:** Wednesday, October 12, 2016 10:12 AM  
**To:** Jonathon Peros <jperos@nefmc.org>  
**Subject:** Chinese scallop enhancement

Jonathon,

Attached are a few photos of Chinese scallop enhancement for informational purposes.

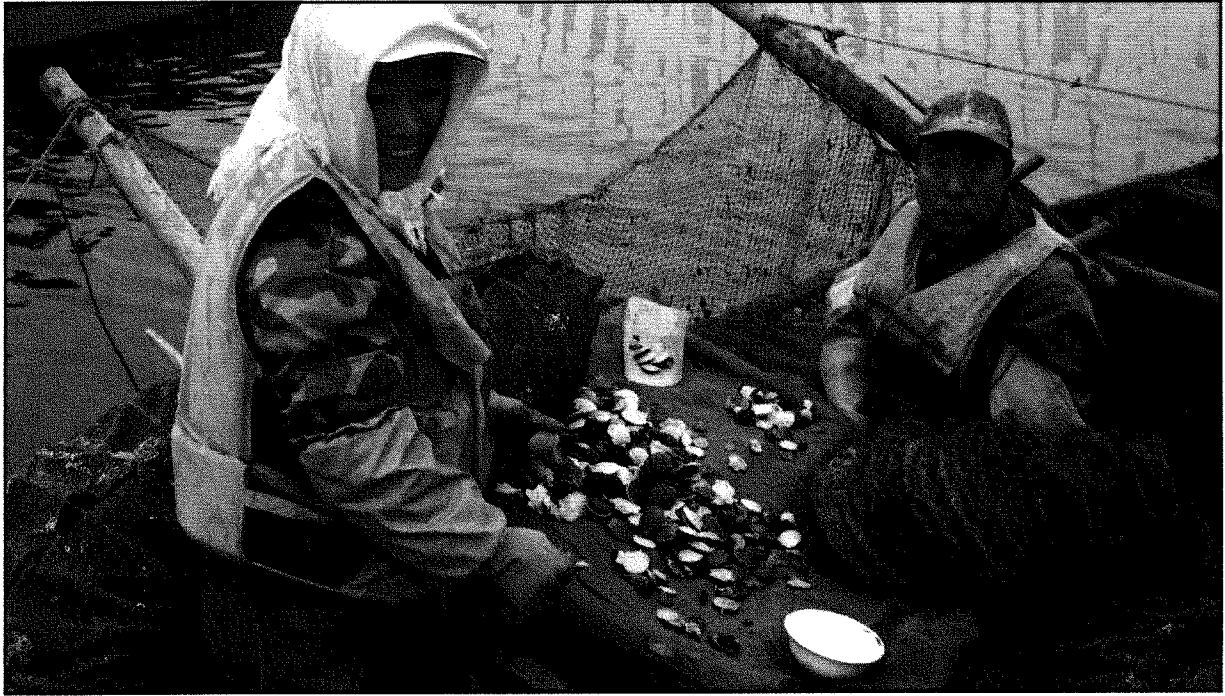
Thanks,

*Peter Hughes*  
Director of Sustainability  
Atlantic Capes Fisheries, Inc.  
985 Ocean Drive  
Cape May, New Jersey  
08204  
[www.atlanticcapes.com](http://www.atlanticcapes.com)  
609.425.3220 cell  
><(((°> ><(((°> ><(((°>

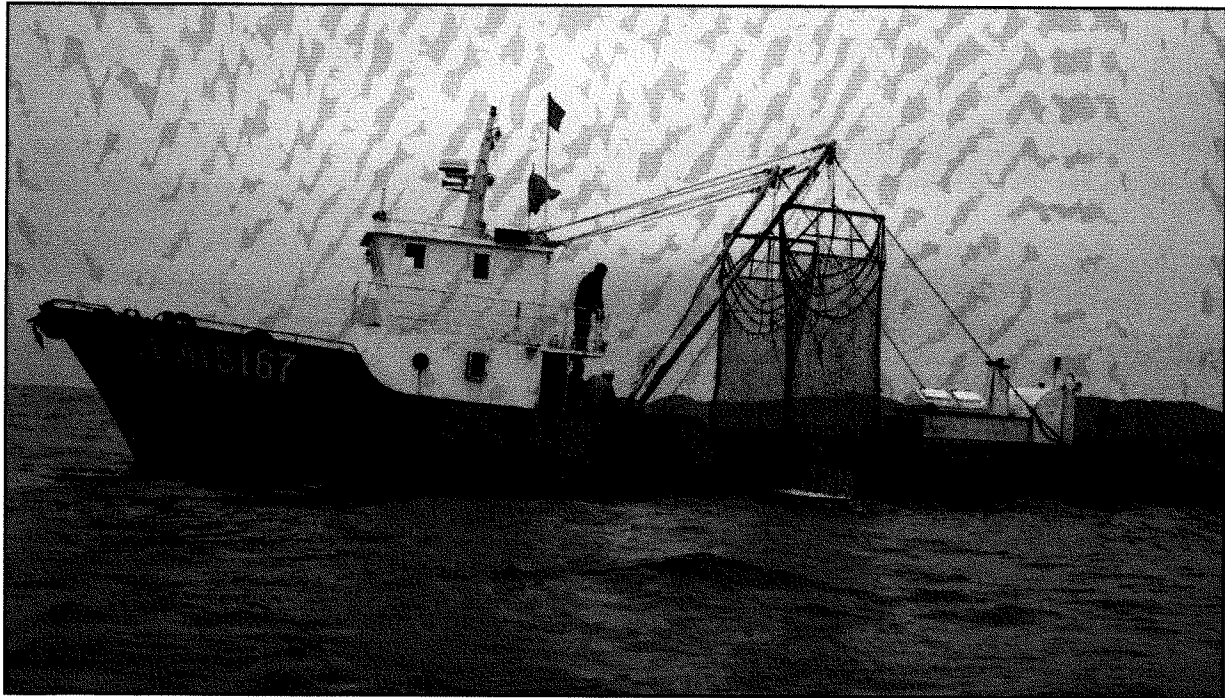
# Chinese Scallop Enhancement

1





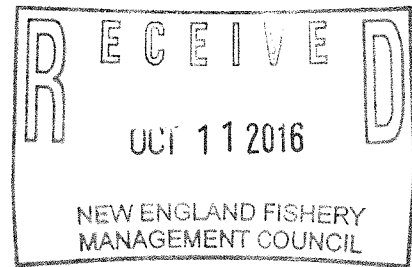




**Sherie Goutier**

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**From:** Julie Miller <jamiller54@roadrunner.com>  
**Sent:** Monday, October 10, 2016 6:28 PM  
**To:** comments  
**Cc:** ben Martens; Togue Brawn  
**Subject:** Input regarding NGOM scallop fishery



Dear

Chairman Quinn, Director Nies and members of the Scallop Advisory Panel and Committee:

I am a fisherman who participates in the Northern Gulf of Maine Scallop fishery . I am writing to you to strongly urge you to solve the inconsistencies that currently exist the NGOM fisheries management plan as it stands now by making it a top priority in the coming year. In keeping with that sentiment I also request that the Council set the FY 2017 NGOM TAC at the most conservative number of 70,000 pounds.

My rationale for requesting the lowest number available is based on the fact that currently there is no way to manage how much product can be removed by the Limited Access Fleet, other than the trigger mechanism of the TAC being reached by the IFQ / NGOM fleet. I understand that the PDT suggests that 400,000#'s of scallops could be sustainably harvested from the entire NGOM. But based on my observations I would expect most of the harvest would come from a small portion the management area which has historically been one of the most productive areas in the NGOM, which could have a negative impact on the rest of the NGOM management area. Not to mention that no one can predict with reasonable certainty what total removal would be under any of the quota scenario's as put forth as there are many variables that could impact harvest beyond the control of management to respond to. This could not be considered sound management and that is the biggest reason that I cannot support a larger quota as much as I would like to. I feel that because of the current management situation we may have squandered a golden opportunity to revive this portion of the fishery that has been missing for so many years already. So I suggest we be as conservative as allowable under the current system, in hopes that we can do a better job in the immediate future which will benefit all the user groups involved as we strive to a sustainable fishery for hopefully years to come. I believe this is the right approach as I was personally involved in this fishery many years ago when it collapsed and it's taken thirty years or thereabout to give us another chance at trying to do a better job. In my opinion any short term gain can easily be negated ( and may have already been ) if we keep looking at short term gains.

Sincerely, Ira Miller

F/V Julie Ann

Tenants Harbor, Maine

Permit

# 231459

*JP 10/17/16*

# **Cape Cod Commercial Fishermen's Alliance Bycatch Avoidance Program**

Interim Report  
26 September 2016

Principle Investigator: Steve Cadrin Ph.D.  
Co-Investigator: Brooke Wright  
Address: School for Marine Science and Technology  
University of Massachusetts Dartmouth  
200 Mill Road Suite 325  
Fairhaven, MA 02719

## **Objectives**

The objective of the SMAST Bycatch Avoidance System is to provide the scallop fleet with near-real time, spatially-specific information on bycatch rates to assist the fleet in maximizing scallop harvest while avoiding bycatch hotspots. The system relies on fishery-dependent data sent from active vessels including the location and amount of fishing effort, as well as the amount of target and non-target catch. The goal of the project was to include the General Category fleet in the avoidance system and collect additional data on scallop discarding to address concerns of potential high grading.

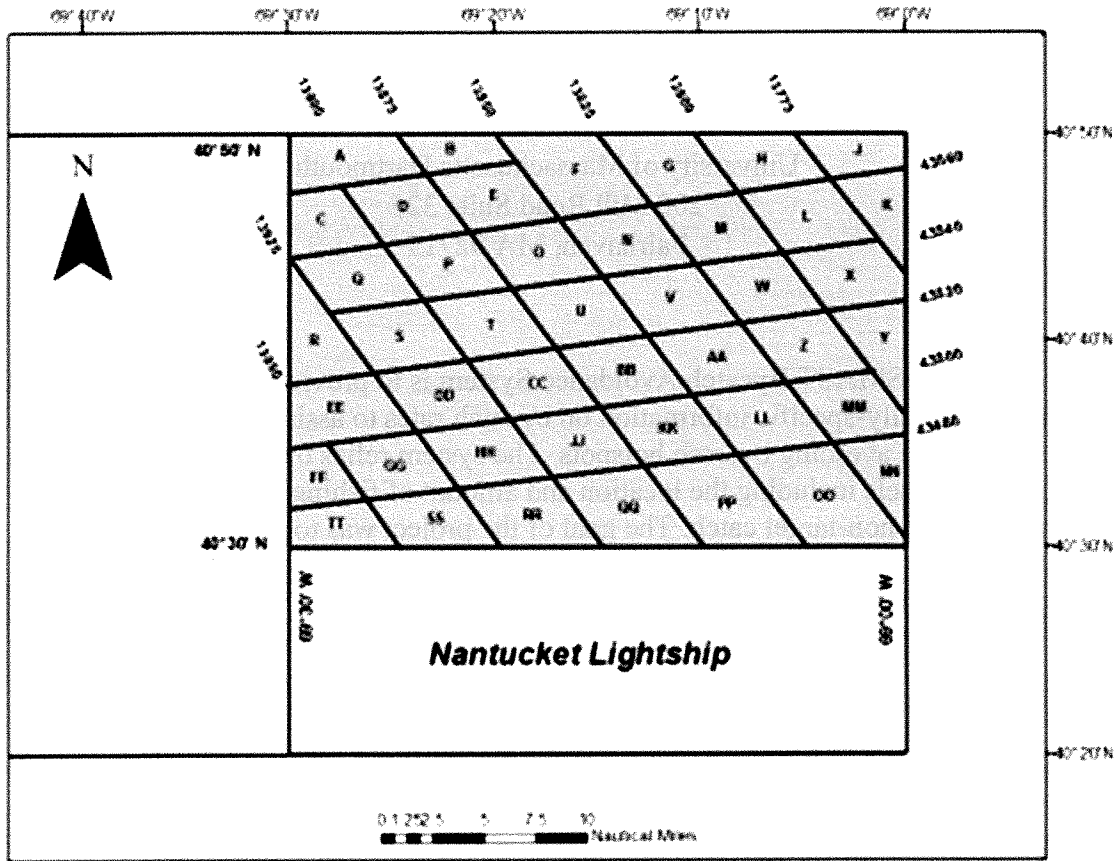
## **Methods**

We analyzed existing sources of information on the spatial distribution and catch rates of scallops and bycatch species. We established seasonal yellowtail and windowpane flounder bycatch thresholds based on past results of the SMAST Bycatch Avoidance System, past observer bycatch information, and the allocations of scallops, yellowtail and windowpane flounder to the scallop fleet in 2016. We sent a series of informational mailings to the scallop fleet in 2016 with instructions on how to participate in the program and the reporting grid for the Nantucket Lightship access area (Figure 1). We worked with members of the Cape Cod Commercial Fishermen's Alliance (CCCFA) to develop reporting protocols that were amenable to General Category fishermen.

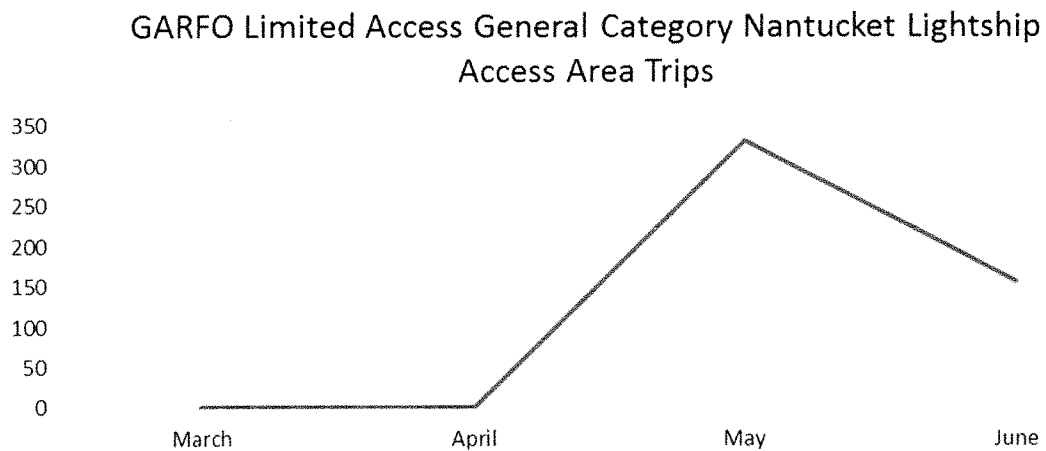
## **Tasks achieved**

We received approximately 205 reports from 18 General Category vessels between 5 May and 17 June 2016 in the Nantucket Lightship access area. Reports were received as a combination of Boatrac reporting macro entries and paper records compiled by CCCFA staff. Three advisories were sent to the fleet via email and posted to the SMAST bycatch website ([www.umassd.edu/smast/bycatch](http://www.umassd.edu/smast/bycatch)) in early June. The majority of fishing effort was reported in the northern part of the access area. General Category vessels used approximately 68% of allocated Nantucket Lightship Access Area trips in May, and completed all trips by mid-June (Figure 2). Overall flatfish bycatch reports were very low, averaging less than 10% of the established threshold for high advisories. There were no reports of the smallest size category of scallops (20-30 count) and a trend in decreasing 10-20 count and increasing U-12 count scallops beginning in late May and lasting through the area closure on 16 June (Figure 3). Following the close of the fishery, Northeast Fishery Observer Program (NEFOP) records from 30 trips were examined for

consistency with fishermen's reports. Length frequency of kept and discarded scallops on observed trips supported the low rate of catch and discards of small scallops from fishermen's reports (Figure 4). Flatfish bycatch rates were also similar (Table 1).



**Figure 1. Reporting grid for the Nantucket Lightship access area for the 2016 fishing year.**



**Figure 2. Limited Access General Category Nantucket Lightship Access Area Trips for fishing year 2016 (accessed from <http://www.greateratlantic.fisheries.noaa.gov> on 22 September 2016).**

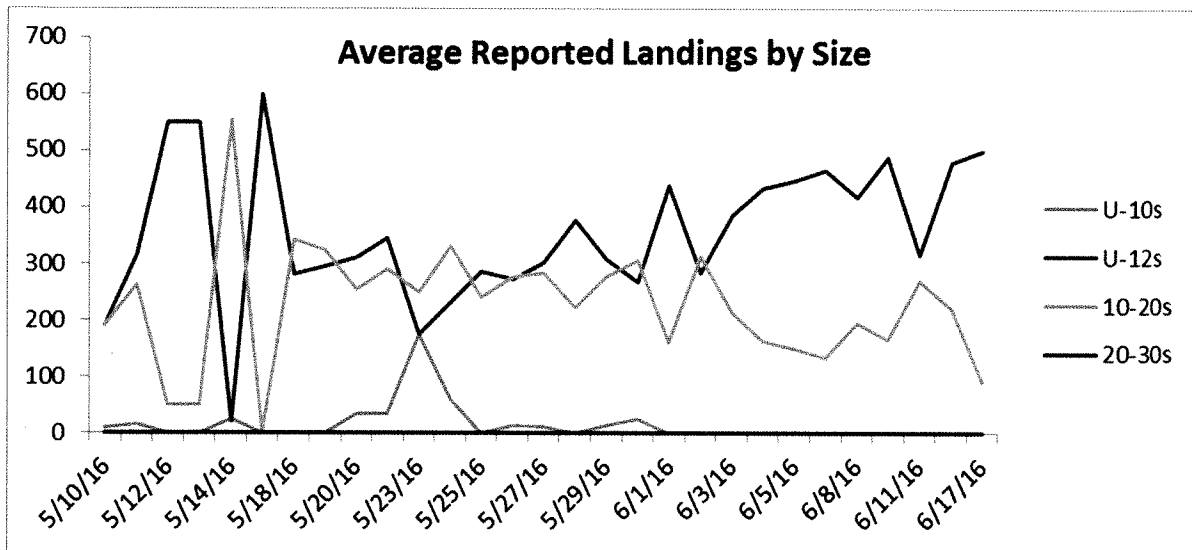


Figure 3. Average landings reported by market size category from the General Category fleet in Nantucket Lightship Access Area.

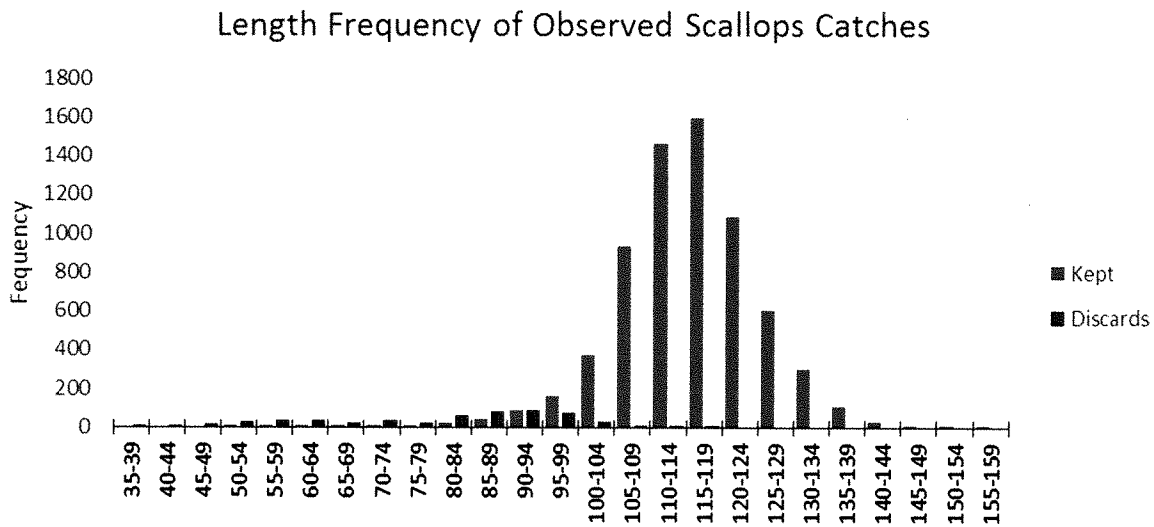


Figure 4. Length frequency of kept and discarded scallops on NEFOP observed trips.

Table 1. Target and non-target catch from fishermen reports and observer records.

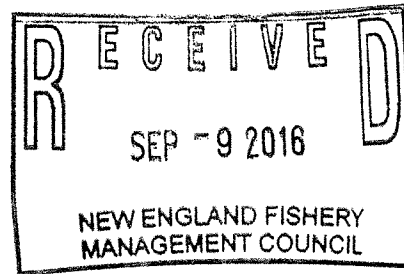
	Fishermen Reports	Observer Records
Total Tows	815	144
Total Kept Scallops (lbs)	127,672	20,049
Total Discarded Scallops (lbs)	~9,456	~1,058
Total Yellowtail (lbs)	24.8	0
Total Windowpane (lbs)	240	35.9
Average Yellowtail(lbs)/Kept Scallop(lbs)	0.0002 ± 0.001	0
Average Windowpane(lbs)/Kept Scallop(lbs)	0.0022 ± 0.005	0.0022 ± 0.006

**Outreach**

We attended a meeting with the Cape Cod Commercial Fishermen's Alliance in Chatham on 1 June, and hosted a meeting with members of the Cape Cod Commercial Fishermen's Association in Fairhaven on 15 July to discuss the Limited Access General Category Nantucket Lightship access area bycatch avoidance efforts. The meetings provided opportunities to address questions and discuss the performance of the Bycatch Avoidance System.



MAINE COAST  
FISHERMEN'S  
ASSOCIATION



September 7, 2016

Terry Stockwell  
Chair, New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

Dear Chairman Stockwell:

Please accept these comments on behalf of the Maine Coast Fishermen's Association regarding **setting the total allowable catch (TAC) of scallops for the Northern Gulf of Maine Management Area for FY 2017**. The Maine Coast Fishermen's Association (MCFA) is an industry-based non-profit which identifies and fosters ways to restore the fisheries of the Gulf of Maine and sustain Maine's historic fishing communities for future generations. Established and run by Maine fishermen, the objectives of the Association are: to provide a voice for our fishing communities; to rebuild the Gulf of Maine ecosystem; and to help build viable fishing businesses on our coast. With members living in Maine communities ranging from Kittery to Mount Desert Island, our fishermen represent a diverse range of fisheries but have come together to form a cohesive voice to weigh in on important management issues. As such, we are extremely interested in building a robust and sustainable scallop fishery in the Gulf of Maine and we hope that the Council will continue to work with us toward that goal.

For the first time in almost two decades, the scallop stock is rebuilding in the Gulf of Maine. This is not surprising considering the hard work that has established a strong state waters population, as well as warming waters within the Gulf. Unfortunately, we cannot yet celebrate the successful return of this valuable stock. Last year, as you are well aware, harvest of scallops *far* exceeded the recommended catch of 70,000lbs within the GOM. The small-boat fleet caught nearly 87,000lbs (between NGOM permits and general category permits) and the limited access boats landed at least 230,000lbs. The presence of so many scallops is obviously a good thing, but our inability to properly control the catch of this important species, especially as it continues to rebuild, is very worrying. The only way to currently regulate the Gulf of Maine scallop fishery is to place TAC catch limits on NGOM and general category boats and close the area to all fishing after the limit has been reached. We recommend a TAC of 100,000lbs for the 2017 fishing year.

The members of MCFA support a 100,000lb catch limit: they recognize that there is a growing scallop population and they want to ensure that Maine's small boat fleet can benefit from that growth. With participation in the groundfish fishery and shrimp fishery not being very lucrative for fishermen in Maine at this time, any additional income is extremely important for our small-boat fleet. The scallop PDT stated that the stock TAC



should represent *all take* from the area, which is currently impossible to control . However, we are aware that the proposed TAC could be as high as 500,000lbs. Increasing the NGOM TAC to this level prior to correcting dangerous management inconsistencies will allow limited access vessels to have an even longer period of unrestricted fishing in this unique and vulnerable area. This could risk delaying the rebuilding of this fishery for another 20 years, which we cannot afford. Instead, we hope that you will support a 100,000lb TAC, which will amount to 83,000lbs after the 2016 overage is applied, resulting in roughly the equivalent of what was caught in 2016.

Additionally, we ask that the scallop AP, scallop committee, and the NEFMC prioritize fixing these management inconsistencies within the NGOM management area. This is crucial to the success of our fishery, and we hope that you will ensure that this work gets done in a timely manner.

Thank you for your support and attention to this issue.

Sincerely,

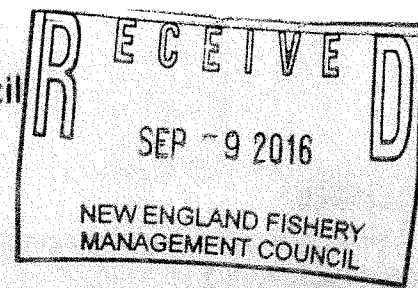


Ben Martens  
Executive Director





Terry Stockwell  
Chair, New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950



Dear Chairman Stockwell:

My name is Benjamin F. Cook Jr. and I am a fisherman from Bucks Harbor (town) or fishing vessel F/V Clean Sweep (boat name). I'm writing to ask you to set the N TAC at (70,000 or 100,000) pounds in 2017, and also to prioritize correcting dangerous inconsistencies that threaten the viability of the resource and the fishery.

The NGOM management area was created in recognition of the fact that the G Maine scallop resource fluctuates widely, and happened to be at a low point in qualifying years for Amendment 11. If Terry Stockwell and others had not work create the NGOM, many fishermen would have been shut out of a fishery that historically been very important to them. Many of us have for a long time to get NGOM permits to use, and it's a shame that after all the years of waiting I must now you to limit our catch to far below what scientific research says can safely be taken in this area. But because of the huge gaps that exist in the regulations, that is exactly what I am doing.

For the 2017 fishing year, I strongly believe that the TAC should be set at no more than 100,000 lbs. Currently, the General Category and NGOM boats tap at the TAC 200 pounds at a time. While they're doing that, Limited Access boats can harvest an unlimited amount of scallops from the area. The only way to constrain scallop catch within the NGOM is by setting a TAC that our small boats can harvest quickly so that all fishing within the NGOM can be stopped. Increasing the NGOM TAC too much prior to correcting dangerous management inconsistencies will allow limited access vessels an even longer period of unrestricted fishing in this unique and vulnerable area.

Setting the TAC too high will put the rebuilding of this fishery at risk. I hope that you will support the 100,000 lb TAC and will prioritize closing the loopholes that currently exist in NGOM management.

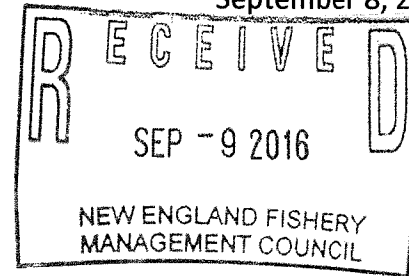
Thank you.

Sincerely,

Benjamin F. Cook Jr.  
F/V Clean Sweep

September 8, 2016

Terry Stockwell  
Chair, New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950



Dear Chairman Stockwell:

My name is Dana Hammond and I a fisherman from Portland, ME on the fishing vessel Nicole Leigh. I'm writing to ask you to set the NGOM TAC at 100,000 pounds in 2017, and also to prioritize correcting dangerous inconsistencies that threaten the viability of the resource and the fishery.

The NGOM management area was created in recognition of the fact that the Gulf of Maine scallop resource fluctuates widely, and happened to be at a low point in the qualifying years for Amendment 11. If Terry Stockwell and others had not worked to create the NGOM, many fishermen would have been shut out of a fishery that had historically been very important to them. Many of us have waited for a long time to put our NGOM permits to use, and it's a shame that after all the years of waiting I must now ask you to limit our catch to far below what scientific research says can safely be taken from this area. But because of the huge gaps that exist in the regulations, that is exactly what I am doing.

For the 2017 fishing year, I strongly believe that the TAC should be set at no more than 100,000lbs. Currently, the General Category and NGOM boats tap away at the TAC 200 pounds at a time. While they're doing that, Limited Access boats can take an unlimited amount of scallops from the area. The only way to the only way to constrain scallop catch within the NGOM is by setting a TAC that our small boats hit quickly so that all fishing within the NGOM can be stopped. Increasing the NGOM TAC too much prior to correcting dangerous management inconsistencies will allow limited access vessels an even longer period of unrestricted fishing in this unique and vulnerable area.

Setting the TAC too high will put the rebuilding of this fishery at risk. I hope that you will support the 100,000lb TAC and will prioritize closing the loopholes that currently exist in NGOM management.

Thank you.

Sincerely,

Dana Hammond  
F/V Nicole Leigh