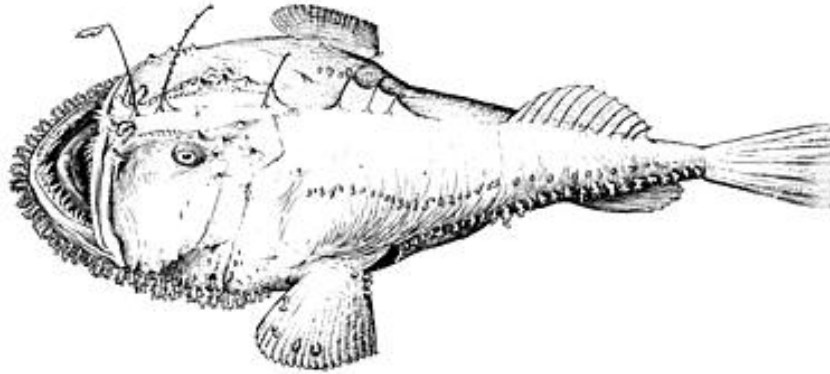


Monkfish Fishery Management Plan

Amendment 6



Public Scoping Comments **Written comments - 1 of 2** **December 2010 – February 2011**

New England Fishery Management Council and the
Mid-Atlantic Fishery Management Council
in consultation with the
National Marine Fisheries Service



Riverhead

Monkfish Defense Fund

c/o Marc Agger
Brooklyn Navy Yard, Bldg. 313
Brooklyn, New York 11205

January 30, 2011

Subject: Comments on the Monkfish Fishery Management Plan Amendment 6 - Catch Shares Discussion and Scoping Document.

The Monkfish Defense Fund (MDF) is an association of monkfish fishermen, dealers, processors and exporters. Following are our comments on the Catch Shares Discussion and Scoping Document.

- 1) The Monkfish Defense Fund (MDF) is opposed to any form of Sector Management in the Southern Management Area (SMA), and is equally opposed to any attempts to LINK monkfish management in the SMA to the New England Groundfish Sector Management System in any way, shape or form.
- 2) The MDF supports having each permitted monkfish vessel's catch history in the Northern Management Area (NMA) and SMA clearly defined and restricted to that particular management area when determining future allocations, catch shares, quotas, any NMA-only sector program, etc.
- 3) The MDF urgently requests the councils reaffirm the Control Date for permitted monkfish vessels to coincide with the end of the 2009 fishing year at the earliest possible moment.
- 4) Considering the differences in the characteristics of the monkfish and associated fisheries in the NMA and the SMA, the MDF supports separate and distinct management regimes in each area if the industry in the North and the South cannot come to agreement over a single management program.
- 5) The MDF supports having a double referendum for all legitimate permit holders in the SMA to determine if the fishermen: (1) wish to explore the possibility of fishing under a catch shares program; and (2) to approve any final catch share program. Each referendum would be subject to the two-thirds majority requirement for adoption.
- 6) If the initial referendum shows that members of the fishery in the SMA are in favor of considering management via catch shares, the MDF requests that the Monkfish Catch Share Allocation and ITQ Referendum Proposal – revised 6/4/09, serves to initiate discussions on catch shares. The MDF does not endorse any of the particular options presented in the document, nor does it reject any options that are not included.
- 7) The MDF supports having the SMA monkfish fishery included in the Mid-Atlantic Council's "visioning process" for a discussion of potential catch share fisheries in the Mid-Atlantic region. The MDF believes this is an opportunity to inform future decision-making in the region that should not be ignored.
- 8) The MDF does not support moving forward with a catch share program while the monkfish stock remains in a data poor condition. The MDF requests that NMFS take whatever steps are necessary as soon as possible to have monkfish removed from the "Data Poor Species List"

including at least two more cooperative trawl surveys, one conducted every second year beginning in the spring of 2012.

- 9) The MDF will not support any management regime in the SMA that substantially changes the character of the fishery as it exists today if it is not designed and accepted by a majority of fishery participants.

The MDF believes that monkfish management as it is currently being done is meeting the needs of the monkfish industry and that from fisherman to dealer we would all be better served if resources that would be committed to designing and then "selling" a catch shares management program in the SMA were instead devoted to increasing the level of knowledge of the monkfish stock. Simply removing monkfish from the Data Poor category would provide significant tangible benefits to the participants in the fishery (as well as to the fish) while entailing none of the dislocations that a move to catch shares would unquestionably generate.

Finally, we have been informed that the Mid-Atlantic Council has formed a Social Science Subcommittee of its Scientific and Statistical Committee. While it's not a part of the scoping document, we are taking this opportunity to request that this Subcommittee explore Community-Based Management options which might be appropriate for the monkfish fishery in the Southern Management Area. We will provide as much input, information and support to this effort as we are able to.

Sincerely,

Marc Agger

Email: marcagger@gmail.com

Telephone: 718-855-1717

Riverhead NY
1/31/11

To Whom It May Concern:

I would like to start off by saying I am not for or against ~~seas~~ or ITQ's. There are a lot of questions that need to be answered first. Here are some of my concerns. First one is, right now only half of permits are active. That means everyone who is fishing at 90 or 100% of it's potential is going to get less fish than they are now to accommodate the permits that are not actively fishing. Unused permits need to be addressed.

If you look at page 15 for fishing year 2009, I took a rough tally of how many pounds of monk I caught and both of my vessels are in the top 1/8th of boats catching between 65,000 and 235,000 lbs. of monk. But if you look at page 18 and find Hampton Bays and look at the dollar value, I know I caught almost that much myself. That to me says the data is wrong. And if mine isn't right it is a safe bet that most others are wrong too. There are at least five other directed boats that fish there part of the time also, not counting all non directed fishing trips for the whole port.

History from the north has to stay in the north and history from the south has to stay in the south. Qualifying years should be current like from 2003 -2008. Current years show economic dependency. For example: potentially a boat in the north could land more fish in one trip than I could for the whole year by fishing exclusively in the south. By dividing history up into each area it levels the playing field for everyone.

Who is going to pay for dockside monitors and mandatory observer coverage? I can't. At a time when operating costs are going up for equipment there is less room for profit. It seems like it is more about giving someone else a job while you are on the verge of losing yours.

I would like to see what we are going to get before we decide what we are going to do. I don't want to be forced into something because in your mind you think it is going to be better, then to find out later that it is worse. I can't afford to have things get worse. I know what we have now and how it works.

Sincerely,

Tim Froelich
F/V's Miss Independence & Liberty

Timothy Froelich

Stoping Comments on Monkfish

JAN 25, 11

Eastport N.Y. 11941

Dear Mr Kunkul

As a past monkfish advisor for over 25 years I must strongly protest any change to the current monkfish regulations. If something is working, why fix it?

I have been fishing for monkfish before there were any (over 25 yrs) regulations at all. At no time has the resource been in better shape. D.A.S. has been an effective tool in managing the monk fishery. Please do not force I.T.Q. on sectors on the hard working and brave fisherman engaged in this fishery.

In a recent mailing from the N.M.F.S. the landings for monkfish were grossly understated for Shinnecock N.Y. I know for a fact that one boat landed the meager and stated by N.M.F.S. as this what sectors or I.T.Q. ↓

will be based on? If this is
so, it's a criminal injustice.

All fishermen and those
that fish out of Shannock^{N.Y.} or
Hempstead Bay N.Y. risk their lives
on a daily basis to provide
food for a growing populace.
Please don't restrict their
ability to fish with more
onerous regulations, sectors or
I.T.G.

Instead give us the respect
and help afforded to other food
producers like farmers, who are
~~not hamstrung by~~ who are given
grants to buy diesel motor and pumps

Please stop taking and
give us more D.A.S. No Sectors

Yours truly
Richard M. LaRocca
30 E. Pond
Eastport N.Y. 119

To: Patricia Kurkul, and Monkfish Committee Members,

According to the amendment 6 scoping document, page 13, of the monkfish fisheries in both the northern and southern fishing zones, monkfish are not being overfished.

As a monkfish fisherman for many years, I feel very strongly that catch shares, ITQs, and IFQs are not the way to go in the monkfish fishery, or in the Mid-Atlantic. We the fisherman have the Day at Sea program(DAS) in effect here in the Mid -Atlantic and it works. We call in before we sail, and call out when we come back from fishing. Everything is logged in log books and recorded. So why change something that is in place and working? (DAS) has also increased the monkfish biomass in the stock.

From what I have been hearing and seeing from the Northern Atlantic states, where catch shares and sectors have been put in place, the fisherman are taking it on the chin, because of the cut backs on fish allocations in sectors and the catch share program. Fisherman can't afford the extra expenses put on them by the government, with dockside monitoring, at sea observers and VMS. Not only in extra expenses, but not being able to support the homes, boats, and crew members that have families also. By not being able to catch fish that have been allocated to them when they got qualified for the (DAS) Program, by using the category A,B,C,D,E, permits method, their income has dropped drastically.

(DAS) is in effect and easy for fisherman to understand. It is easy to adjust days allocated for fishing, and trip limits for fish that were allocated per day for that trip. Fisherman have it tough enough with the economy the way it is, with over priced fuel and increasing expenses on our boats. So please leave what we have in place. Why fix something if it is not broken????

We should consider leaving Groundfish, Monkfish, Skates, and Multispecies as separate management plans, because they are all different. Yet all are caught in theses and other fisheries, and are allowed as some bycatch at times..

Thank you for the time to voice my concerns and opions during this scoping period.

Ed Chiofalo

Ed Chiofalo

CARSON'S MARINE INC.
WEST MAIN STREET
CRISFIELD, MD. 21817

PHONE ~~410-968-3600~~
410-968-3600

FAX ~~410-968-3600~~
410-968-3600

FAX TRANSMISSION

NUMBER OF PAGES (including cover letter): 1

NOTE: If you did not receive all of the pages or if you have a question, please call the phone number above.

DATE:

1-16-11

FAX NO.:

1-978-281-9135

FIRM NAME:

ATTN:

Patricia Kurekul

FROM:

LEE ROY CARSON IV

Permit # 150357

SUBJECT:

Propping on Montpelier Adm. 6

REMARKS:

To Whom it Concerns

The system we got works, the saying you
if its not broke dont fix it.

Thank you



From: thomas coley <tpcoley@sbcglobal.net>
To: monkfisha6@noaa.gov
Subject: scoping comments on monkfish amendment 6
Date: 02/07/2011 9:42:45 AM

To: Patricia A. Kurkul
Regional Administrator, N.M.F.S.

"Scoping Comments on Monkfish Amendment 6"

My name is Thomas Coley. I am a scallop vessel captain in the full time scallop fleet. I reside in Connecticut. I believe the current monkfish management program is working, because as stated in the scoping document, both the northern and the southern stock components are not overfished, and overfishing is not occurring. Scallop vessels have historically always caught monkfish, and it is an important part of the fishery.

I am against moving the monkfish fishery to a catch share management system. The only current catch share management system in place in New England is in the groundfish fishery and it has many problems and is currently in litigation. In the groundfish fishery some owners have accumulated large amounts of quota while others don't have enough and are going out of business because they can't afford to purchase or lease any more quota. Catch share management systems are not fair and equitable to all fishermen. Catchshare programs cause large scale consolidation, which puts many fishermen out of business, and puts the fishery into the hands of a few well financed people. I am against any fishing program that leases, rents, or stacks permits and quota. This is only good for investors, the fishermen become tenant farmers.

In the scallop fishery we don't always catch our allowance of monkfish, but sometimes we do. I don't want this ability to catch monkfish taken away from the scallop fleet. I am also concerned that with catch share management, the monkfish could become a "choke" species, used against the scallop fleet to close fishing grounds. Another concern I have is that although monkfish is a traditional catch in the scallop fishery, that if there was to be a referendum vote, scallopers could be excluded from this vote because of the "income-dependent criteria" in New England.

In conclusion I would say no to a catch share management system in the monkfish fishery. The fishery is not overfished and overfishing is not occurring. And I don't believe there are any

problems with the current management program.

Captain; Thomas Coley
11 Palmer Terrace
Clinton, CT. 06413

Patricia A. Kurkul
Regional Administrator
NMFS, Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930

Re: Monkfish Scoping Comments

February 10, 2011

I would like to submit my written comments for inclusion into the Monkfish Public Scoping Process. I have already given public testimony at two of the public hearings that have taken place throughout the region. My written comments are meant to affirm those that I gave orally at those meetings. I am the owner of one fishing vessel with a monkfish permit, as well as a shore-side business in New Bedford, Mass. I currently employ 18 people, all of whom will be negatively affected by Amendment 6 to the Monkfish Management Plan as currently proposed.

The leading issue that I will address is that there is no conservation based reason to change the current limited access monkfish management plan into a "Catch Share" management scheme. As documented by the Stock Status report on page 13 in the working document for Amendment 6 to the Monkfish Fishery Management Plan, **"both the Northern and Southern stock components are not overfished and overfishing is not occurring."**¹

Catch Shares at least as currently devised and implemented, does not approach fishery management fairly or equitably. In fact Catch Shares have never been accurately defined in any of your documents,. It has been used to describe the matter of the moment, it's use has been intended to solely confuse the issues and the resulting actions. It has shown that those who are in a better strategic position financially, will be the ones who will "achieve the economic sustainability" that NOAA continually uses as bait, to entice the unwary or uninformed. This ruse is currently devastating the less strategically placed permit holder and vessel owner. It is doing even further harm to the ordinary fisherman and his family, along with the businesses and supporting infrastructure that has built itself around this industry for decades.

"The monkfish resource is not overfished, nor is overfishing occurring. East coast monkfish tails, cheeks, and livers generate landings that are worth about \$40 million annually!"² This revenue is currently shared among fishermen of two management regions, and across several different fisheries, with various catch limits assigned to specific permitted classes. This approach has worked, and worked well, as evidenced by another statement made in the same NEFMC news release: **"The Council has also approved a 2011-2013 annual catch target for the Southern Management Area (SMA) of 11,469 metric tons, or 25 million pounds. The new SMA**

¹ A 6 Catch Shares Discussion and Scoping Document, Jan.- Feb. 2011, pg. 13

² NEFMC News Release, June 25, 2010 (emphasis added)

and NMA (10,750 metric tons or 24 million pounds) catch targets represent increases of 75% and 100%, respectively, over the catch targets in place since 2007. The increases are justified based on peer reviewed stock assessments that have concluded both monkfish stocks are above their management biomass targets.³

The report goes on to state: **“But the assessments contain statements about the uncertainty associated with the scientific understanding of monkfish biology, a situation that warrants a precautionary management approach.”**⁴ If there truly is a weakness in the monkfish management plan, it is that uncertainty and lack of understanding, as stated above, which causes monkfish to be classified as a “Data Poor Stock”. The NEFMC and NMFS should first be addressing these issues in Amendment 6 with better science and surveys, rather than the aggressive attempt to redesign and recreate the fishery in its own preconceived vision. The NMFS, through the manipulation of the regional Councils, is attempting to manage the lives and future of the people rather than the health of the fisheries!

The goal of NOAA, as stated within the Amendment 6 Scoping Document, **“is to achieve long-term ecological and economical sustainability of the fishery resources, and fishing communities.”**⁵ As evidenced by the Catch Share/Sector program currently in place for the New England Multispecies fishery, this is not what is occurring. While a minority of fishermen (approximately 1/3rd) are able to make this system work for themselves, it comes at a cost to the greater majority of fishermen (approximately 2/3rds) who cannot. These numbers do not even take into consideration the cost to the fishing communities, to the infrastructure and the ancillary businesses that are already withering, as we deliberate imposing further harm upon the industry and their communities.

Since the Magnuson-Stevens Act was first implemented in 1976, the majority of these fishermen and their communities have struggled and worked to rebuild the fisheries to their current state, which in the case of monkfish, is approaching its rebuilt status. Now, through newly imposed management schemes, we are encouraged to adopt a plan of cultural manipulation that will be nothing less than genocide to the vast majority of these same fishermen and their communities.

NOAA and the NMFS have spent millions of dollars in a self-serving way in an attempt to force the adoption of a system called Catch Shares/Sectors, and failing that, at least to make them appear to be achieving their goals. This money should be spent in advancing the science needed to achieve a better understanding of not only this “data poor” stock, but of all the resource that they are mandated to protect and sustain. Bettering the science should be the goal of Amendment 6, not social engineering by way of allocation.

³ NEFMC News Release, June 25, 2010 (emphasis added)

⁴ NEFMC News Release, June 25, 2010 (emphasis added)

⁵ Amendment 6 Monkfish FMP, Catch Shares Scoping Document pg.3

A careful reading of the “National Standards” within Magnuson, particularly National Standards 2, 4, 5 and 8,⁶ will also show that Amendment 6 as currently proposed fails to meet those Standards in any form. Failure to at least attempt, to meet those Standards is essentially against the Magnuson-Stevens Act, which is the fishery law of the land.

In another example of failing to adhere to Magnuson, there has been a carefully crafted attempt to differentiate Catch Shares from Individual Fishing Quota (IFQ). Apparently, this is being done in an attempt to avoid having to meet the requirement in Magnuson for a referendum, if a fishery management plan or amendment creates an IFQ program.⁷

As yet another example of not meeting the requirements of Magnuson-Stevens Act, a comprehensive Socio-economic impact statement has not been provided for public consideration and comment. The Act states that a plan or amendment that is submitted;

(9) include a fishery impact statement for the plan or amendment (in the case of a plan or amendment thereto submitted to or prepared by the Secretary after October 1, 1990) which shall assess, specify, and analyze the likely effects, if any, including the cumulative conservation, economic, and social impacts, of the conservation and management measures on, and possible mitigation measures for—

(A) participants in the fisheries and fishing communities affected by the plan or amendment;

(B) participants in the fisheries conducted in adjacent areas under the authority of another Council, after consultation with such Council and representatives of those participants; and

(C) the safety of human life at sea, including whether and to what extent such measures may affect the safety of participants in the fishery.⁸

Dr. Steven Murawski, the recently retired Director of Scientific Programs and Chief Science Advisor for NOAA Fisheries Service, stated in January 2011 that overfishing has ended. On the record with the Associated Press, Dr. Murawski was confident in saying that for the first time in recorded history, no fish stocks were being over-fished by US fishers. His statement regarding the health of all the United States fish stocks, as reported far and wide in the local and national press, should show that we were meeting the rebuilding requirements of Magnuson. Why then should so many individuals, who had struggled to remain viable during the rebuilding periods, and had born the sacrifices for these past 15 years to meet those rebuilding goals, need to surrender in order to implement the suspect goals of a few?

⁶ Magnuson-Stevens Fishery Conservation and Management Reauthorization Act 2006, Sec.301, pg.58

⁷ Magnuson-Stevens Fishery Conservation and Management Reauthorization Act 2006, Sec. 303A, 6D, pg.84

⁸ Magnuson-Stevens Fishery Conservation and Management Reauthorization Act 2006, Sec. 303, pg. 75

At a time when the monkfish stocks have been rebuilt to a level that supports increases in the Annual Catch Targets for 2011 - 2012, why then are NOAA/NMFS, through the joint efforts of the New England and Mid-Atlantic Councils, attempting to direct those efforts to reducing the biomass of the fishermen through the adoption of Catch Shares/Sector management?

After attending the public hearings in New Bedford, MA and Riverhead, NY it was clearly the consensus that the vast majority of fishermen present preferred the "status quo!" As stated by one of the fishermen who spoke at one of these public hearings; **"better the devil you know, than the devil you don't!"** The reality and spectacle of what has already occurred as a result of Amendment 16 to the Multi-species Management Plan has put fishermen, fishing families and their communities in dire fear of Catch Shares/Sector management!

Thank you for consideration of my comments.

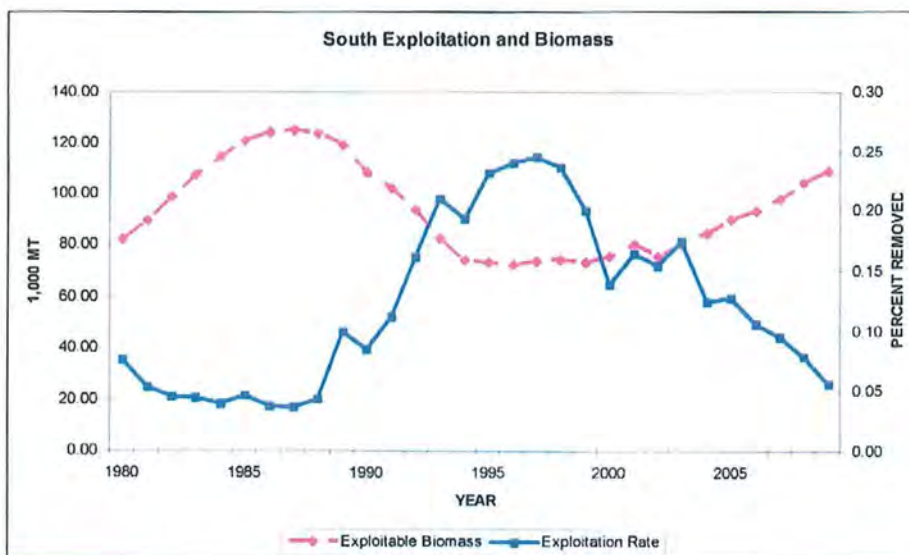
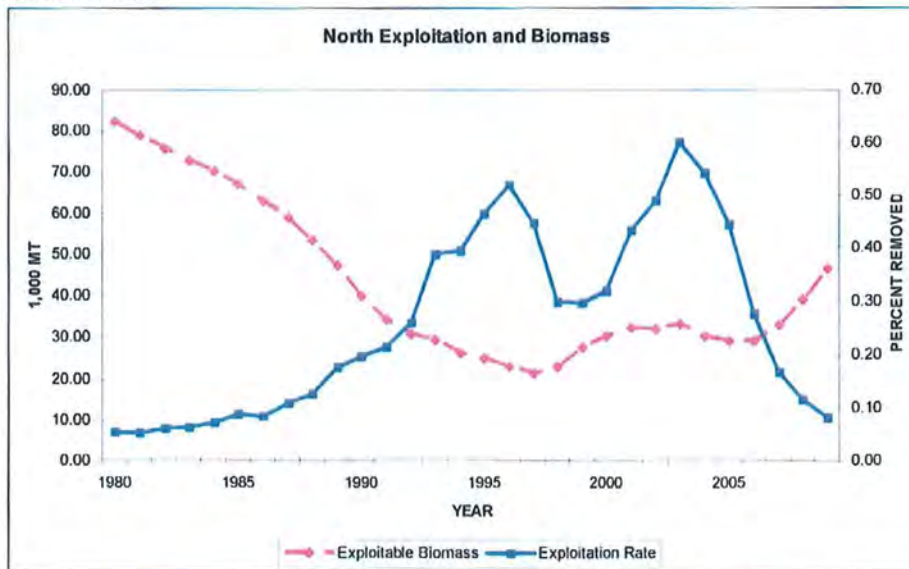
Harriet Ane Didriksen
Port of New Bedford, MA

CC: Senator John F. Kerry
Senator Scott Brown
Congressman Barney Frank
Mayor Scott W. Lang
New England Fishery Management Council
Monkfish Chairman Terry Stockwell (NEFMC)
Monkfish Vice-Chairman Howard King (MAFMC)
Monkfish Analyst Phil Haring (NEFMC)

Description of the Monkfish Fishery

Stock Status

- Stock assessments in 2007 and 2010 concluded that both northern and southern stock components are **not overfished** and **overfishing is not occurring**
- Both stock components are above the biomass target associated with maximum sustainable yield
- Both assessments strongly emphasized the **high degree of uncertainty** in both the input data and the model results



From: Patty <danchise@charter.net>
To: monkfisha6@noaa.gov
Subject: Fw: catch shares
Date: 01/13/2011 7:40:25 PM

----- Original Message -----

From: Patty
To: 4walkers1@versiso.net
Sent: Wednesday, January 12, 2011 8:34 PM
Subject: catch shares

I AM NOT IN FAVOR OF CATCH SHARES.
I DO NOT SEE ANY NEED TO CHANGE A PLAN THAT WORKS FOR ALL INVOLVED. THE STOCKS
ARE REBUILT AND THE MARKET IS NOT STRESSED BECAUSE THE FISH ARE SPREAD OUT
THROUGHOUT THE YEAR. NMFS HAVE SET THE DAYS AND TRIP LIMITS AND WE LIVE WITH
IT.
DON'T FIX SOMETHING THAT ISN'T BROKEN.

F/V HANDFUL
TOMMY DANCHISE

Comment on monkfish amendment 6

My name is Dan Mears I am owner operator of F/V Monica. I hold a monkfish A permit and have been active in the fishery every year since 1995. I am also part owner of two D permits. one of the D permits has been active since 2001 the other is in history. my home port is Barnegat Light. there are several monkfish boats in Barnegat Light. most are owner operated. the town of Barnegat Light is one of the biggest producers of monkfish in the mid-Atlantic. a majority of the fisherman in this town do not support moving to a catch share system or sectors including myself. the main reason being is the current system that is in place seems to work for everyone. having days at sea is about the same as having a catch share. so why mess with something that is not broke? however there is one thing that needs to change in the current system. the biggest problem we have is having to stop hauling gear when we reach are catch limit. there are times when we can not get back to the gear for several days do to weather. a lot of the fish that are left behind in the net are not marketable by the time we get back to them. if we had a running clock which everyone in Barnegat Light supports there would be way less waist. the nets would be cleaned out every trip out. this would be a big plus for the fishery. another thing I would like to see changed is having monkfish separate from multi-species. having the two together creates nothing but problems for guys holding D or C permits in are area. when out on a monkfish day we are using a 12 inch net and do not interact with any multi-species such as cod, yellowtail, haddock, etc. in closing I would add that having catch shares there would be winners and losers. the losers most likely being the small boat operations and the town of Barnegat Light needs those guys to continue to stay in business. thank you for the opportunity to comment, Dan Mears

Received 2/17/11

February 15, 2011

Peter Cura
M&P Fishing Corp
114 MacArthur Drive
New Bedford, MA 02740

My name is Peter Cura, I am the owner-operator of the fishing vessel *Fisherman* homeported in New Bedford, MA. I have been fishing in this country for over 30 years. I am writing to express my opposition to adopting a catch share system in the monkfish fishery of which I am an active participant. I primarily target monkfish in deep water on Georges Bank and the Gulf of Maine. Even though I likely would stand to benefit from a high allocation of monkfish based on my fishing history, I disagree with a catch share sector system on principle, mainly due to the adverse social and economic impact such a system has on captains and crew. Under any catch share system, I could easily sell my quota and tie my vessel to the dock and enjoy a comfortable living from the proceeds, but I've consciously decided to keep my vessel active out of concern for the well being of my crew, even though doing so requires that I purchase additional quota to last an entire year. I would not be able to sleep well at night if I put my crew out of work.

If the groundfish catch share system is any example, a monkfish catch share system will similarly have adverse impacts on many captains and crew. In the groundfish catch share system, the plight of captains and crew has been grossly ignored. For many years, fishing industry practice prescribed that a vessels catch be split 50-50 between vessel owner, the captain and his crew. In fact, up until the early '90's the split was actually 58-42 in favor of the captain – crew! In other words, captain and crew received economic compensation for half of the resource, while the vessel owner received the other half. Under the groundfish catch share system, vessel owners who sell their quota receive 100% of the proceeds instead of only 50%, while the captains and crew receive 0%. To add insult to injury, not only are they not compensated, but they are left unemployed. Based on long standing history and precedent, hardworking captains and crew have an important stake in the resource and are entitled to their half. When drafting catch share regulations, the New England Fishery management Council and NOAA neglected this precedent. Any monkfish catch share system should avoid mistakes made with groundfish catch shares and include provisions to compensate captains and crew. An alternative idea would be to allow a vessel to keep its half of quota and release the other half to the remaining vessels active in the fishery.

This regions fishermen entrust the New England Fisheries Management Council with the responsibility to safeguard them from socio-economic inequities such as what they are currently

experiencing under groundfish catch shares. Hardworking men, who put fish on deck and in the hold during the vessels 10 year landings period, should receive their fair portion. To now be denied access to public fisheries resources is completely unfair, unethical and immoral. In effect, the fishermen's basic and demonstrable rights to this nation's public fisheries resource have been taken away by the catch share system. The fish belongs to them and should not go to anyone else.

Inevitably, the sale of a vessels quota in a catch share system results in sudden unemployment for vessel captain and crew. Since these men are predominantly heads of households, one can only imagine how the sudden loss of earnings results in grave social and economic consequences to both their spouses and children who depend on them solely for income. Since the implementation of groundfish catch shares, it has become exceedingly difficult for them to come up with money for their basic necessities like, mortgage and rent payments, medical expenses, car payments, and health insurance. Saving for retirement is an afterthought. Furthermore, many fishermen are important contributors to their children's higher education at area schools. Without their fathers financial support, the sons and daughters of unemployed fishermen struggle to continue attending school.

In some cases captain and crew, have worked for the same vessel for decades. They have labored long and hard, year after year. How can we allow such economic injustice to occur to our honorable fishermen? They have sacrificed a great deal while plying their trade far out at sea, in harsh conditions, away from their loved ones. While we sit around the café table and reminisce about how much we New Englanders esteem our fishermen, the fact is, they have been completely disrespected by the catch share system developed by the New England Fishery Management Council and approved by NOAA. The New England Fishery Management Council should act on principal and take steps in the near future to create a provision to prevent this from happening again. The NEFMC should restore the rights of captain and crew and do what is morally and ethically correct by requiring vessel owners to compensate their captains and crew when vessels individual quota is sold.

With the implementation of catch shares, the view from here is that there are two options for the working fishermen of New Bedford, the loss of your job, or the reduction in income from the purchase of quota to remain barely viable. What makes this practice more difficult to swallow, is that a vessels quota-based on their landings history was received for free! They didn't have to pay for it in the past, so why are they getting paid for it now! Vessel owners are making money on a public resource they received free. It was never solely theirs to begin with.

A minority group of fishermen who receive a high allocation of fish and don't have to purchase additional quota like the rest of the fleet, are understandably in favor of catch share systems. Obviously, if a majority received similarly high individual vessel quotas, they too would be in favor of catch shares. We need to find a way to restore balance and fairness with allocation of the resource within sustainable limits.

The NEFMC should take the following actions before catch share sector management system is considered for the monkfish fishery.

1. A referendum should be taken to approve or reject switching from the current regulations governing monkfish to an individual vessel quota (catch share – sector) system.
2. The votes of a vessels captain and the vessels crew should be counted equally with that of the vessel owner.
3. A provision should be adopted requiring vessel owners to compensate their captain and crew at least 50% upon sale of the vessels quota
4. Each vessel should be provided with their allocation before the referendum and not after like what took place prior to implementation of groundfish catch shares. Knowing your allocation prior to the vote will allow owners, captains and crew make an informed decision. There should be no surprises about what the vessels allocation will be.
5. The NEFMC should consider modifying the current monkfish regulations to improve economic efficiencies, for example, allowing the combination of permits on a single vessel, and adding flexibility to the clock / DAS counting. This type of modification may be all that's required rather than adopting a completely new form of management.

To reiterate the above, any catch share management system should include a requirement to share vessel quota with crew when sold. It seems unfair to not compensate crewmen for their years of hard work at sea. Our fishermen are the hardest working men in America. They are wholeheartedly deserving of our respect and better treatment than what the groundfish catch share system has unjustly imposed. The catch share sector management system is simply un-ethical, as well as immoral and should be stopped in favor of a more socio-economically equitable fishery management system. It should not be repeated in the monkfish fishery.

Thank you for the opportunity to share my points of view in light of my decades of experience.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter Cura". The signature is fluid and cursive, with a large initial "P" and a stylized "Cura".

Peter Cura
Captain and Owner FV *Fisherman*

From: chuck etzel <chucketzel@yahoo.com>
To: monkfisha6@noaa.gov
Subject: Monkfish amendment 6
Date: 02/04/2011 2:45:27 PM

To Whom It May Concern,

I am writing in regards to the scoping for amendment six. I want to be clear before I write any further. I will not support any management for any species that resembles what we have with ground fish sectors.

I am in favor of the status quo for monkfish. I started monkfishing in 2001 since then we have seen ups and downs in limits and biomass. On a whole we have done well on our DAS system. Right now we are experiencing big increases in skate catches however we have been unable to retain the skate that we catch due to low limits. We have seen good improvements in the Das system such as an offshore fishery category f permit that allows vessels to consolidated their DAS so they can catch there monkfish allocation efficiently. This "Offshore fishery" mostly appeals to the larger boat fishery. We are in the process of allowing a running clock on our monkfish DAS so we can land 2 limits in a 24+1 accrual. We have been on the positive side of the rebuilding schedule since 2005.

Right now with the implementation of groundfish sectors we are and will see some more effort in the SNE area for monkfish. We are looking at a shutdown of lobstering in our area. This will put more effort on the monkfishery. These are all concerns. However nothing concerns me more than the disregard for the communities and effect of over regulation on existing business. This "regime" is pursuing an IDEA, That idea is We are still overfishing and we have too many boats chasing to few fish. The Fact is stocks are healthy! If we cut down on regulatory discards we could support more fishers than we do now. If we harvested our allowed quotas on species we could support more fishers. If we increased our Conservative goutas we could employ more fishers. We have a real dirty secret called "underfishing" that managers are numb to. It is kind of like how we are getting numb to discarding thousand of dollars Worth of marketable fish as regulatory discards. Only regulators just look at the numbers as discards and we physically have to deal with the labor and fact that we are wasting perfectly good fish in pursuit of there IDEA of what is better for everyone.

The following is my "IDEA of itqs. I just want to be clear that this is my idea. I do not want to turn into our regime that rules on there ideas of overfishing and too may fishers. Our capacity to catch fish is great. We could feasibly catch all of our fish with very very few boats. But we do not want that. We have shown in surveys such as the fleet visioning that we want a diverse fleet not an efficient fleet. ITQs will promote an efficient fleet which

will require very few boats. We all know that a large boat that can fish year round 24/7 can catch fish the most efficiently and deliver a fresh processed product. ITQs will consolidate the fleet rapidly. At first you will see quota aggressively bought up by fishermen with good financial backing. Then non fishermen will dominate the fishery in years to come. Fishermen will never know

the the sense of accomplishment of owning there own boat,I have owned my boat since 2007 and it is hard but rewarding.

I would like to see a reversal in policy by noaa and nmfs. Let look at the economics of fishing and if these cuts will help our country or hurt our country.Let look at fish as a natural resource that we all can profit from and not as a natural resource that we should look at and not touch.

Please lets not bulldoze the existing DAS System in pursuit of this Idea that ITQs will solve all of our problems.

Sincerely, Chuck Etzel

From: Allison McHale <Allison.McHale@noaa.gov>
To: monkfisha6@noaa.gov
Subject: [Fwd: Monkfish / Sectors]
Date: 12/28/2010 10:25:01 AM

----- Original Message -----

Subject: Monkfish / Sectors
Date: Sun, 26 Dec 2010 13:23:12 -0800 (PST)
From: chuck etzel <chucketzel@yahoo.com>
To: Allison.McHale@noaa.gov, Andrew.Cohen@noaa.gov, greenfluke@optonline.net, cbat@comcast.net, cheri.patterson@wildlife.nh.gov, dave.chanda@dep.state.nj.us, Dale.Jones@noaa.gov, david.pierce@state.ma.us, david.simpson@ct.gov, Diana.Avery@noaa.gov, dmiko@state.pa.us, douglas.grout@wildlife.nh.gov, egoethel@comcast.net, fishearlybird@cox.net, comments@foxnews.com, francesflt@aol.com, friends@foxnews.com, George.Darcy@noaa.gov, george.lapointe@maine.gov, me@glennbeck.com, glen@midcoastfishermen.org, HChris5509@aol.com, hspeir@dnr.state.md.us, huckmail@foxnew.com, info@asmfc.org, CATCHSHARES@noaa.gov, jack.travelstead@mrc.virginia.gov, James.Weinberg@noaa.gov, Jane.Lubchenko@noaa.gov, jgrabowski@gmri.org, Jim.Balsiger@noaa.gov, jimfair@comcast.net, jjgilmore@gw.dec.state.ny.us, Joel.G.Macdonald@noaa.gov, joeshaw@southamptonpress.com, john4impnb@aol.com, louis.daniel@ncmail.net, marcagger@gmail.com, mark.alexander@ct.gov, Mary.A.Colligan@noaa.gov, stormlobster@yahoo.com, mbtooley@roadrunner.com, davidfalkowski@hotmail.com, Nancy.Thompson@noaa.gov, Noelle.Bowlin@noaa.gov, Dimitry.Abramenkoff@noaa.gov, oreilly@foxnews.com, Pat.Kurkul@noaa.gov, paul.diodati@state.ma.us, peter.himchak@dep.state.nj.us, Peter.N.DeCola@uscg.mil, RCole@state.de.us, rdrumm@ehstar.com, red.munden@ncmail.net, ripc@comcast.net, BRocha@athearnmarine.com, rodavila@comcast.net, Russ.Vetter@noaa.gov, Ryan.Silva@noaa.gov, smcgee@environmentaldefense.org, swheins@gw.dec.state.ny.us, terry.stockwell@maine.gov, timothy.t.brown@uscg.mil, brett@namanet.org, trawlers@maine.rr.com, voshea@asmfc.org, wateraye@gmail.com

To Whom It May Concern,

I am writing to you concerning the scoping of monkfish Catch shares with amendment 6. Please do not go with a sector system for monkfish. The sector system is an expensive, poorly implemented way of managing fish stocks.

There is pressure to put forward a sector system for monkfish to follow the groundfish sector program. The sector system has only consolidated effort and gave fishers with larger landings a way to stay in the fishery at the expense of other fishers. The das system was not a bad system. It was the system we have worked with for many years now and many fish stocks were coming back. We will never be able to keep diversity in our fleet with the kind of consolidation that has occurred in the past 10 months. The sectors have added extensive layers for people to keep fishing, and yes every layer must make a dollar adding to the cost of doing business.

We need to find simple solutions to our fishing "problems". Changing ways of management in the middle of rebuilding plan is not a solution. Das is a good management tool. There are ways of increasing efficiency in the das system. We have an offshore fishery program that many large vessel owners do not know about. Come May 1 we will have a monkfish running clock that will let us land double trips using the vms. These are just some examples of increasing efficiency in the das system. I will be sending in a comment directly for amendment 6. Any corrections or questions please do not hesitate to contact me
at chucketzel@yahoo.com

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Allison McHale  
Fishery Policy Analyst  
NOAA / National Marine Fisheries Service  
55 Great Republic Drive  
Gloucester, MA 01930

(978)281-9103

**F/V Miss Leslie  
1 - 5 Cape Street  
New Bedford, MA 02740  
Phone (508) 993-9505  
Fax (508) 993-1910**

National Marine Fishery Service  
55 Great Republic Drive  
Gloucester, MA 01930

February 15, 2011

Dear Patricia Kurkul:

I would like to object to the recent proposal to convert the monkfish fishing regulations to a catch share and/or sector regulation. I believe this is a poorly thought out proposal and is designed only to appease those at the highest echelon of this administration, regardless of what the science is, and what the affect of the biomass and the fishing communities will be.

In the New England and Mid Atlantic Fishery Management Councils' Monkfish Fishery Management Plan Amendment 6 – Catch Shares Discussion and Scoping Document it states the monkfish biomass is not overfished and overfishing is not occurring and the overall biomass is above the maximum sustainable yield. I would also note there appears to be a great deal of uncertainty regarding the biomass, probably due to the low level of scientific study in the fishery.

The Councils' Scoping Document also noted that "one quarter of the vessels landed two thirds of the total" monkfish landings and "[T]he top 1/8'th of vessels landed between 65,000 lbs. and 235,000 lbs. and accounted for 43% of the total". If the catch share/sector proposal were to be approved it would necessarily imply that 25% of the permit holders would receive the bulk of the total allowable catch while leaving three quarters of the permit owners scrambling for ways to ensure they have enough quota in order to fish.

While it has been said many times yet continues to fall on deaf ears I will say again, it is not NOAA's responsibility or prerogative to make winners or losers in the fishing industries and their communities in order to promote its own agenda. By the Magnuson-Stevens Act, the Act which NOAA must adhere to, NOAA is directed by using the best available science to ensure the sustainability of the fisheries and the fishing communities. As I have noted, it appears the science in this fishery is sporadic at best, the biomass is not overfished and overfishing is not occurring. By any other standard it appears the monkfish fishery is a perfect example of a successful fishery and NOAA's attempt create additional hardships for the majority of fishermen in order to promote its own agenda. I would also like to note how heavily the New England and Mid Atlantic Fishery Management Councils' Monkfish Fishery Management Plan Amendment 6 – Catch Shares Discussion and Scoping Document relied on various environmental groups to create the Scoping Document and influence the decision.

I would like the Councils to reject the catch share/sector proposals in the monkfish fishery.

Sincerely,

Paul Weckesser



**From:** Krista Walker <chincowalkers@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** FW: Monkfish amendment 6  
**Date:** 01/13/2011 2:57:22 PM

From: chincowalkers@hotmail.com  
To: red.munden@ncdenr.gov  
Subject: Monkfish amendment 6  
Date: Thu, 13 Jan 2011 14:53:52 -0500

Council members,

My name is Chris Walker, I am a full time commercial gillnet fisherman from Chincoteague Virginia. I am writing this letter in hopes that I can be of assistance in helping both councils better understand how the H category permit for monkfish fisherman operate , also give a brief history in how the permit was created. I was a monkfish fisherman in my area before it was necessary to have a federal permit. In 1997 due to a geographical boundary line change left me out of the fishery, whereas I didn't need a permit before I needed one now. Without federal reports to backup the fact that I was indeed in this fishery I was unable to catch monkfish anymore. For seven years Jimmy Ruleh , council member at the time fought to see that I as well as five other fishermen were granted permits. There was a northern boundary placed on these permits which didn't allow us above the 37.40 parallel or just above Ocean city MD. These would be the H category permits. This line was put in place in case of a large influx of boats tried to enter the fishery under the same criteria, what this means is it would keep us from moving any further north. The number of H permits still remain at six. Unfair as it may seem we gladly accepted this permit and the opportunity it brought for employment. We do not want to go further north , we just want to persevere to the right to go fishing and support our families , in turn our communities, in turn our country. There are a large number of environmental issues that we face, in North Carolina, we can't fish below Wimple Shoal, we have to fish inside of three miles and outside of two, up to the NC/VA line, from March 15th to April 15th. After April 15th we have to move up above the 37.56 parallel or just twenty miles or so below our northern boundary. Still happy with the opportunity of employment and also still producing enough monkfish to make a living we now face the possibility of another change.. Catch share issues. Unless industry driven and allocation is based on the worth of the permit (days x weight) there are problems aimed at these fishermen, including myself again. Without the opportunity to fully utilize this permit, we would be treated unfairly again. My suggestion would be to stay with the current plan , it seems to be working out well . The call in system, days at sea , and a daily catch limit work for me as well as the other H category permit holders. Please feel free to contact me if there are any questions that may help in the decisions that would ensure a fishery that has a bright future. Thank you for your time . Capt. Chris Walker F/V Krista, Caleb & Morgan

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To: Patricia Kurkul, and Monkfish Committee Members,

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According to the amendment 6 scoping document, page 13, of the monkfish fisheries in both the northern and southern fishing zones, monkfish are not being overfished.

As a monkfish fisherman for many years, I feel very strongly that catch shares, ITQs, and IFQs are not the way to go in the monkfish fishery, or in the Mid-Atlantic. We the fisherman have the Day at Sea program (DAS) in effect here in the Mid-Atlantic and it works. We call in before we sail, and call out when we come back from fishing. Everything is logged in log books and recorded. So why change something that is in place and working? (DAS) has also increased the monkfish biomass in the stock.

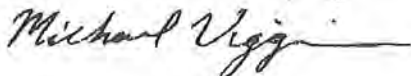
From what I have been hearing and seeing from the Northern Atlantic states, where catch shares and sectors have been put in place, the fisherman are taking it on the chin, because of the cut backs on fish allocations in sectors and the catch share program. Fisherman can't afford the extra expenses put on them by the government, with dockside monitoring, at sea observers and VMS. Not only in extra expenses, but not being able to support the homes, boats, and crew members that have families also. By not being able to catch fish that have been allocated to them when they got qualified for the (DAS) Program, by using the category A,B,C,D,E, permits method, their income has dropped drastically.

(DAS) is in effect and easy for fisherman to understand. It is easy to adjust days allocated for fishing, and trip limits for fish that were allocated per day for that trip. Fisherman have it tough enough with the economy the way it is, with over priced fuel and increasing expenses on our boats. So please leave what we have in place. Why fix something if it is not broken????

We should consider leaving Groundfish, Monkfish, Skates, and Multispecies as separate management plans, because they are all different. Yet all are caught in theses and other fisheries, and are allowed as some bycatch at times..

Thank you for the time to voice my concerns and opions during this scoping period.

MICHAEL VIGGIANO





Office of the Supervisor  
WILLIAM J. WILKINSON  
Supervisor

## TOWN OF EAST HAMPTON

159 Pantigo Road  
East Hampton, NY 11937



Office: (631) 324-4140  
Fax: (631) 324-2789

February 14, 2011

Ms. Patricia Kurkul  
North East Regional Administrator  
NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Ms. Kurkul

**Re: Scoping Comments on Amendment 6 to the Monkfish Fishery Management Plan.**

I write to you today with great concern for East Hampton's monkfish fishermen.

I would like to thank you for scheduling one of the Amendment Vi scoping meetings in Riverhead NY. It is often difficult for our fishermen to attend distant meetings. At the January 31<sup>st</sup> meeting, your representative mentioned that the Riverhead meeting had been the best attended meeting thus far. This is a testament to the importance of the monkfish fishery in our fishing community.

Amendment VI to the FMP has been greatly discussed among our fishing fleet of both directed monkfish fishermen and non-directed monkfish fishermen. All speak united against the use of Catch Shares as a fisheries management tool in the Monkfish fishery in the Southern New England (SNE) fishery management area.

The Monkfish DAS management system has been in effect since the 1990's, and has met with much success. The monkfish stock in SNE is doing well under current management system, specifically Days At Sea (DAS), Limited Entry and Total Allowable Catch. Your own stock assessment show we have been on the positive side of the rebuilding schedule since 2005. *If it isn't broken, don't fix it.*

Most fishermen have become accustomed to DAS and have structured their lives around it. Our fishermen do not want catch shares because of the rapid consolidation of the fleet, which will occur. East Hampton Town does not want catch shares because fishermen like monk fishermen provide year

*cc Pet, email to Allyson (2/17)*



round industry, which benefits all our residents. The wives and children of monk fishermen don't want catch shares because fewer fishermen on the water make fishing more dangerous. Fishermen rely on each other for safety. We rely on fishermen for food and economic inputs.

The Scoping process is used to identify a range of actions and alternatives, one of which is taking no action. I strongly urge you to take no action and maintain current DAS management measures in place for Monkfish in SNE.

Sincerely,

A handwritten signature in black ink, appearing to be 'William J. Wilkinson', written over a horizontal line.

William J. Wilkinson  
Supervisor Town Of East Hampton

Cc:

Senator Charles Schumer  
Senator Kirsten Gillibrand  
Congressman Timothy Bishop  
Suffolk County Executive Steve Levy  
New York State Assemblyman Fred Thiele  
New York State Senator Ken LaValle  
NEFMC Chair John Pappalardo  
MAFMC Chair Richard Robins  
NY DEC Marine Bureau Chief Jim Gilmore

East Hampton Star  
East Hampton Independent  
East Hampton Press  
Patch

**From:** Christopher Nye <nyepie@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Catch shares for monkfish  
**Date:** 02/01/2011 1:09:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions, IF THE PROGRAM WILL HAVE THE EFFECT OF DRIVING SMALL FISHERMEN OUT OF BUSINESS IN FAVOR OF LARGE, INDUSTRIAL-SCALE OPERATIONS.

I agree that the primary objective should be preserving the resource so that there are fish to catch in the future.

Thank you for this opportunity to comment and I look forward to your response.

Christopher Nye  
190 Rote Hill Road  
Sheffield, MA 01257  
413 229-8136

**From:** RICKSHEEN@aol.com  
**To:** monkfisha6@noaa.gov  
**Subject:** Scoping comments on monkfish Amend.6  
**Date:** 02/07/2011 8:12:37 PM

My name is Rick Mears,I own or co/own 3 Monkfish permits,2 of which are active 1 in CPH.We operate

in the Southern Management Area and always have.

The biggest problem I see with the current DAS and trip limits is when we go fishing and the fishing is good

you cannot haul all your gear and harvest your whole catch.If the weather is good (it never is)you can go

back out after letting 24 hours elapse and resume hauling.This means more fuel being burned and more

wear and tear on boats and crews.Often during the winter we only get short windows of decent weather and

cannot go right back out.This results in wasted fish that are left to rot and be eaten by sea lice.

If we could incorporate a "running clock" where we could land whatever fish we have in nets and be charged

the appropriate DAS.This would mean less wasted fish and would ultimately reduce the amount of time the

gear is in the water.

The current measures call for a vessel with a CAT. C or D permit to remain outside the Demarcaion line

for at least 24 hours to land a double limit.These trips end up being at least 25 hours dock to dock.The

weather window doesn't usually last that long.A and B permits can preload the clock ,which is good.

I am not sure Catch Shares are the way to go in our fishery.I am in favor of keeping fishermen fishing.

I am afraid the small boat fleet would be shut out,and the majority of quota would go to large companies

where the owners dont even go fishing.This seems to be the trend in the Gen. scallop fishery.The folks who

want to fish will have to pay non fishing "wishermen" for the right to fish.

I am also against Sectors in our fishery.

I would also considor seperating the North And South areas further if a plan cannot be agreed on between

two.

I would like NMFS to take the necessary steps ASAP to have Monkfish removed from the "Data Poor

Species List", with more trawl surveys.

Our fishery doesn't need much changes, I think a couple small tweaks would help the actual fishermen

and the resource as well.

Thank You for your consideration in these matters,

Capt. Rick Mears

F/V Frances-Anne

Barnegat Light, N.J.



# New Bedford Seafood Consulting



**Captain James M. Kendall**

19 Weaver Street

New Bedford, MA 02740-1240

Tel. (508) 997-0013

Fax. (508) 997-0913

Cell (508) 287-2010

Email: nbsc@comcast.net



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Fisheries Management

Seafood Quality Control Assurance - HACCP Certified

Vessel and Crew Safety

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Patricia A. Kurkul  
Regional Administrator  
NMFS, Northeast Regional Office  
55 Great Republic Drive  
Gloucester, MA 01930

Re: Monkfish Scoping Comments

February 14, 2011

I am submitting my written comments for inclusion into the Amendment 6 Monkfish Scoping public document. I did attend three of the public hearings where I did have an opportunity to offer some of my comments and I would like to expand upon them. Since I am no longer a fisherman, I would like to offer a bit of perspective of my background and relative experience with regard to monkfish.

As a former scalloper, I participated in the early days of the monkfish fishery. Later I was one of the original NEFMC members who were on the first monkfish committee, and participated in the development of the original monkfish FMP.

Apparently, that plan and the following Amendments to monkfish fishery management plan have worked. Since the adoption of the FMP in those early days much has changed, not only in the subsequent plans, but disposition of the participants, and the health of the resource. Monkfish is no longer overfished, and overfishing is not occurring, and has not in either management area for 3 or more years. While a new Amendment is needed to meet the new requirements of the reauthorized Magnuson-Stevens Fishery Management Act of 2007, there is certainly no biological reason to be forcing a Catch Share allocation management plan onto the fishermen.

As part of the process to implement Catch Shares, the public hearing document takes great pains to offer various reasons why they are considering Catch Share management. The document points out various reasons why the Councils are considering Catch Shares, but do not cite any specific references or proof of these claims that might provide the public the opportunity to either challenge or accept them.

The document states that nearly 3/4ths of the New England fishermen who hold monkfish permits are also in a Catch Share program known as Sectors. This statement regarding the level of participation in the Sector program might be intended as a commendation or an acclamation of Catch Shares, but the majority of those same fishermen apparently do not agree with that! The document further states that "some of those permit holders have requested that the NEFMC consider Catch Shares in the monkfish fishery..."<sup>1</sup>

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<sup>1</sup> Monkfish FMP Amendment 6 – Catch Shares Discussion & Scoping Document, pg 3



Isn't the normal protocol for such measures generally done in a written request and then vetted up through the various Council processes? On the other hand, are Catch Shares such a high priority of NOAA/NMFS that the Councils will adopt and attempt to implement these "request" regardless of, or despite the interests of the greater majority of interested parties?

The Catch Shares/Sector program that is now in place for the multispecies fishermen in New England has been a catastrophe for the majority of permit holders. Only about 1/3<sup>rd</sup> of the permit holders have been actively fishing, while the remaining 2/3<sup>rd</sup>s have been forced to try to lease their allocations. While this may provide a modicum of income for those permit holders, it does not provide any recompense for the deckhands of those vessels, nor does it provide for any of the associated industries and communities that provided support and logistics for those stagnant vessels.

If a Catch Shares program was to be adopted, and if the allocation process was to mirror the allocation process that took place for the multispecies permit holders, the resulting outcome would invariably be the same. A woefully inadequate dispensation of the catch history, with little recourse for an adequate appeal process! What would their alternatives be? Would it be a similar purgatory as the multispecies' Common Pool? Would Caps or ownership levels be provided for before or after the allocation process, perhaps in future years? Where does the **"set-aside harvesting privileges"** come from that will be used when necessary and appropriate...?<sup>2</sup>

How can you even dare to consider **"General Allocation Approaches"** where the "allocation formulas" may be based upon **"level of investment, i.e., such as vessel length, size or combined value of other capital investments"**? Particularly, **"since this option is important for new entrants or where landings data are unreliable or do not exist."**<sup>3</sup>

An ironic stroke, is that the "Historical participation" consideration on page 5 of the document, is a victim of an apparent typographical error where the conclusion of the considerations are abruptly missing, or are they the victims of an apparent Freudian Slip?

I have stated previously that the approach to Catch Shares/Sectors is not fishery management, it is more a form of social engineering through allocation, that now supersedes any concern for the relevant fish species, for that of the management of the participants. How else do you explain the forced expulsion of the long-term participants in the rebuilding processes, who have struggled in order to remain viable just so they could be able to harvest the benefits that we all have worked so hard to achieve? The resulting harm in such cases is much more wide spread than is first readily apparent. These ill-conceived plans harm the families, the fishing communities, along with all the supporting infrastructure and businesses throughout those communities.

The terms "Catch Shares and Sectors" seem to have come about as alternative verbiage to the term Individual Fishing Quota (IFQ), this being done in order to avoid triggering the mandate in Magnuson that requires that a referendum approve by 2/3<sup>rd</sup>s of those voting for any fishery management plan or amendment that creates an individual fishing quota program in New England.<sup>4</sup>

NOAA/NMFS is well aware of this provision and have carefully crafted their steps to exclude any sector allocation program from this provision, even when it essentially is the same. A monkfish by any other name (e.g., goosfish, anglerfish, monkeyfish, *Lophius americanus*, etc.) is still a monkfish!

<sup>2</sup> A6 Catch Shares Discussion and Scoping Document, Jan.- Feb. 2011, pgs. 5

<sup>3</sup> A6 Catch Shares Discussion and Scoping Document, Jan.- Feb. 2011, pgs. 5&6

<sup>4</sup> Magnuson-Stevens Fishery Conservation & Management Act 2007, Sec. 303A-6D.i, pg. 84

The bottom line to this whole issue should be wise and efficient fishery management! Not only in this FMP for the conservation and sustainable harvest of this monkfish resource, but all our FMPs; as is very clearly stated in the "National Standard 1 for Fishery Conservation and Management!" Several other of the 10 National Standards also should be adhered to in the development of this FMP as well, they are "National Standards, 2, 4, 5, & 8."<sup>5</sup>

The health of this resource is good, and has improved to the point where the NEFMC approved a 2011-2013 annual catch target increase for both the Northern & Southern Management Areas, of 75% & 100% respectively, over the prior catch targets that were in place since 2007.

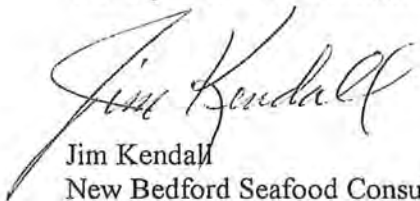
There are more compelling issues to be effectively managed in any future amendments to this management plan, we should be working in that direction rather than blindly adopting management strategies that have been proven to exclude the very people and communities who have carried the weight of the rebuilding processes all these years.

There has been millions of dollars expended of the "forced adoption" of Catch Shares/Sectors, not only by NOAA/NMFS, but by a strange coincidence, several of the leading environmental groups. Perhaps none so openly, or as expansively as the Environmental Defense Fund (EDF).

Yes, there are still problematic issues in this management plan. This is true in any of the other FMPs, and that is where we should be concentrating our time, efforts, and money; not in a misguided effort to fashion fishery management in what some people see as the best scenario for their own personal and financial interests.

In closing, I wish to say that I realize that the majority of my comments are directed at the philosophical concerns I have with this document that is by choice, as I feel that the actual biological and conservational concerns are actually less harmful and more beneficial to the fishing industry.

Thank you for their consideration.



Jim Kendal  
New Bedford Seafood Consulting

CC: Senator John F. Kerry  
Senator Scott Brown  
Congressman Barney Frank  
Mayor Scott w. Lang

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<sup>5</sup> Magnuson-Stevens Fishery Conservation & Management Act 2007, Sec.301, pg.58

To: Patricia Kurkul, and Monkfish Committee Members,

I as a dealer and seller of monkfish feel that the Das at Sea Program (DAS) is in place and it is working. The fisherman call into the government before they leave the dock, and they call out when they get back to the dock. Everything is logged in logbooks and recorded.

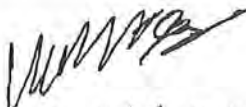
As a dealer and seller of monkfish, I feel very strongly that catch shares, ITQs, and IFQs are not the way to go in the monkfish fishery, or in anyother fishery at this point.

From what I have been seeing and hearing in the Northern Atlantic states, where sectors and catch shares have been put in place, the fishermen's incomes have dropped drastically. By not being able to catch fish that have had allocated to them, in and through the (DAS) program, but have been taken away by the catch shares or sectors program. Not to mention the extra expenses put on the fisherman by the government with dockside monitoring, at sea observers and VMS. A lot of fisherman are having trouble supporting their homes, boats, and crew members who have families also.

We should also consider leaving Groundfish, Monkfish, Skates and Multispecies as separate management plans, considering that they are targeted in many different ways. Yet they are caught in many fisheries as bycatch sometimes.

According to the amendment 8 scoping document, page 13 of the monkfish fisheries in both the northern and southern fishing zones, monkfish are not being over fished. So why try to fix something that is not broken, if the (DAS) program is working and has brought back the stocks biomass in the Monkfishery leave it in place.

Thank you for the time to voice my opions and concerns during this scoping period.

  
WILLIAM A. MILLIGAN  
BOX 354  
SOUTHAMPTON, NY 11969

SOUTHAMPTON, NY 11969

Scoping comments on Monkfish amendment 6  
Attn: Patricia A. Kurkul, Regional administrator, NMFS  
Email- monkfisha6@noaa.gov

#### Catch share

I have listed many reasons this program should not be implemented.

- 1 extra cost to buy more fish stock under leasing program, hurts bottom line, reduces crew pay.
- 2 in the next 4 years on board observer will cost \$35,000 per 100 days at sea coverage, again hurts bottom line, and reduces crew pay
- 3 under catch share you will also be required to pay 3-15% royalty system to support science, research, law enforcement, and management for the catch share. Again hurts bottom line reduces crews pay.
- 4 under the fish stock sustainability index (FSSI) 230 key stocks. At this point only 16 are managed by a form of catch shares. Ground fishing in New England is one of the sectors that is having huge problems because of this.
  - A) 37stocks nationwide last year were being over fished (counting only those living exclusively in US waters)
  - B) New England had the most with 10 stocks over fished
  - C) With only 15% being over fished why the hard ship is put on fisher man at this time. New stocks reports are coming out with favorable reports of more fish.
- 5 catch shares will not stop over fishing, nor bring a better fish price. Only true TAI will do this. This can only be done with better on time science and data.
- 6 New England 253 boats out of a fleet of 500 not fishing since catch shares
- 7 759 to 1265 people out of work
- 8 Catch share compound by a transfer of wealth and consolidation of revenue. 55 of the 247 boats fishing are now realizing 61% of the revenue. The remaining 192 vessels account for only 39% of total revenue.
- 9 catch shares has not been designed correctly up to this point and rushing here will not help
- 10 \$21 million in direct economic losses and forgone yield of \$19 million for the Massachusetts groundfish fishery. Report prepared by the Massachusetts division of marine fisheries and the University of Massachusetts at Dartmouth and submitted to commerce secretary Gary Locke.
- 11 catch share program has reduced the number of people holding fishing permits and jobs while providing those left in the industry with more stable and sustainable jobs.
- 12 bycatch is still a problem
- 13 need to watch out for lucrative leasing fees in the catch share system
- 14 fish stocks fluctuate so will you're TAC under catch share
- 15 leasing can take 60% of the landed value of fish
- 16 crew shares are less when fish stocks need to be leased.
- 17 with the high cost of leasing, boats with less inexperienced or less crewman will still try to fish in bad weather

Might I suggest some areas to be looked at.

- 1 accurately determine the status of all fish stocks
- 2 rethink fishery management
- 3 establish a systems and inventory management approach to fisheries management
- 4 rethink budgeting programs to better serve fishery management
- 5 make all fishery management council an elected body
- 6 form a fishery management reform commission
- 7 should really look into better computer information. Boats, permits, TAI. Fisherman would not disapprove, they have asked for this. Better reporting, easier on enforcement, information all in one spot so to say. We all deserve better. We may never be able to marry or bridge old computer information to new.

We must move ahead. Fishing stock science and computer to start and then we have a great base to start with. Not the patch work we have now with the abrupt closing of the fish stocks.

Sincerely

Gabrielle Muench  
P.O. Box 307  
Spring Lake, NJ 07762



## **Monkfish Defense Fund**

c/o Marc Agger  
Brooklyn Navy Yard, Bldg. 313  
Brooklyn, New York 11205

January 30, 2011

### **Subject: Comments on the Monkfish Fishery Management Plan Amendment 6 - Catch Shares Discussion and Scoping Document.**

The Monkfish Defense Fund (MDF) is an association of monkfish fishermen, dealers, processors and exporters. Following are our comments on the Catch Shares Discussion and Scoping Document.

- 1) The Monkfish Defense Fund (MDF) is opposed to any form of Sector Management in the Southern Management Area (SMA), and is equally opposed to any attempts to LINK monkfish management in the SMA to the New England Groundfish Sector Management System in any way, shape or form.
- 2) The MDF supports having each permitted monkfish vessel's catch history in the Northern Management Area (NMA) and SMA clearly defined and restricted to that particular management area when determining future allocations, catch shares, quotas, any NMA-only sector program, etc.
- 3) The MDF urgently requests the councils reaffirm the Control Date for permitted monkfish vessels to coincide with the end of the 2009 fishing year at the earliest possible moment.
- 4) Considering the differences in the characteristics of the monkfish and associated fisheries in the NMA and the SMA, the MDF supports separate and distinct management regimes in each area if the industry in the North and the South cannot come to agreement over a single management program.
- 5) The MDF supports having a double referendum for all legitimate permit holders in the SMA to determine if the fishermen: (1) wish to explore the possibility of fishing under a catch shares program; and (2) to approve any final catch share program. Each referendum would be subject to the two-thirds majority requirement for adoption.
- 6) If the initial referendum shows that members of the fishery in the SMA are in favor of considering management via catch shares, the MDF requests that the Monkfish Catch Share Allocation and ITQ Referendum Proposal – revised 6/4/09, serves to initiate discussions on catch shares. The MDF does not endorse any of the particular options presented in the document, nor does it reject any options that are not included.
- 7) The MDF supports having the SMA monkfish fishery included in the Mid-Atlantic Council's "visioning process" for a discussion of potential catch share fisheries in the Mid-Atlantic region. The MDF believes this is an opportunity to inform future decision-making in the region that should not be ignored.
- 8) The MDF does not support moving forward with a catch share program while the monkfish stock remains in a data poor condition. The MDF requests that NMFS take whatever steps are necessary as soon as possible to have monkfish removed from the "Data Poor Species List"

including at least two more cooperative trawl surveys, one conducted every second year beginning in the spring of 2012.

- 9) The MDF will not support any management regime in the SMA that substantially changes the character of the fishery as it exists today if it is not designed and accepted by a majority of fishery participants.

The MDF believes that monkfish management as it is currently being done is meeting the needs of the monkfish industry and that from fisherman to dealer we would all be better served if resources that would be committed to designing and then “selling” a catch shares management program in the SMA were instead devoted to increasing the level of knowledge of the monkfish stock. Simply removing monkfish from the Data Poor category would provide significant tangible benefits to the participants in the fishery (as well as to the fish) while entailing none of the dislocations that a move to catch shares would unquestionably generate.

Finally, we have been informed that the Mid-Atlantic Council has formed a Social Science Subcommittee of its Scientific and Statistical Committee. While it’s not a part of the scoping document, we are taking this opportunity to request that this Subcommittee explore Community-Based Management options which might be appropriate for the monkfish fishery in the Southern Management Area. We will provide as much input, information and support to this effort as we are able to.

Sincerely,

Marc Agger

Email: [marcagger@gmail.com](mailto:marcagger@gmail.com)

Telephone: 718-855-1717

Dear Council Members,

I am disappointed to hear that the New England and Mid-Atlantic Fishery Management

Councils are considering the implementation of catch shares within the Monkfish Fishery. I understand that catch shares is the new national policy of NOAA/NMFS. I also recognize that the intent behind catch shares is to develop sustainable stocks. If sustainability is the goal then I fail to see the logic behind forcing a new, complex and costly management strategy onto a fishery that is not overfished and not near the overfishing threshold. Monkfish in fact are thriving. The current Limited Access Management Plan is a success. Why is the Council considering altering a management plan that is working? Why would the Council unnecessarily jeopardize a healthy fishery by drastically altering an already successful management plan?

Rather than investing the time and dollars into developing a catch shares system where one is not needed the Council should be spending its time working to improve its management science. We know that Monkfish are plentiful. Any captain will tell you that. Yet we still struggle with the stock assessments. Doesn't it make more sense to improve the science and then once we know the facts alter the management plan (if it requires any alterations)? As the old saying goes "garbage in equals garbage out." If we cannot improve the science behind our assessments how will we ever effectively manage the resource? NMFS should tackle the science first and the management second.

Lastly, Magnuson-Stevens requires that potential economic impact must be considered during the development of management plans. Those of us on the East coast have seen first-hand the devastation inflicted on a fishery when a poorly planned and poorly executed catch shares management system is forced upon a fishery. We have lost 1,200 fishing related jobs over the last year in New Bedford, Massachusetts alone. Catch shares within the Monkfish Fishery will lead to job losses at a time when this country cannot afford to lose more jobs. Fisherman, shore support, dealers and their families will all be impacted. Catch shares will also lead to a loss of tax revenue by our coastal communities. And, as it has with the Northeast Multispecies Fishery, it will lead to a few powerful individuals controlling a significant share of the Monkfish resource.

I urge the Council to vote against catch shares within the Monkfish Fishery and to focus on the science behind the stock assessments.

Sincerely,

Cameron S. Miele  
Owner, F/V Kathryn Marie and F/V Hunter



**From:** Gail Marsh <gail\_marsh@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Catch shares for monkfish  
**Date:** 02/01/2011 1:23:04 PM

I oppose the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares would likely reduce the number of local fishermen active in this fishery. This would lead to a smaller number of jobs in coastal communities. Essentially the catch shares program would move us in the direction of a monopoly, or would sharply reduce the number of small players and leave only the large industrial fishing fleets as participating members.

Incentives should be used to maintain the participation of local fishermen, especially those using ecologically sound fishing methods.

Gail Marsh  
2713 McDowell Road  
Durham, NC 27705

February 21, 2011

Sirs,

I am writing because I am unable to attend this important Monkfish meeting and will not be able to speak on this personally.

Initially, I thought catch shares in this fishery would be a good idea mostly because of the discard issue we have with gillnets and having to leave nets once we caught our quota. After discussing the issue with several gillnetters here in Chatham, MA, my opinion has changed to a different perspective. I believe we can eliminate the discard problem by using a running clock, starting May 1st of this year.

Eliminating discards was, I believe, the major driving force behind moving this fishery toward catch shares. After attending the meeting in New Bedford, I see that the majority of the scallop fleet is opposed to the catch share idea. I believe we need to work with them and keep availability of monk open to them. They are the biggest economic drivers and cannot be shut down due to a lack of monkfish.

Also, we should open up the idea of leasing monkfish days similar to the Multispecies fishery, to help those who direct on these fish.

I believe a referendum will not pass by the majority of stakeholders and we should seek alternate ideas instead of the ITQ alternative that can be implemented quickly.

Respectfully,

Jan Margeson  
F/V Decisive  
F/V Great Pumpkin  
Monkfish Advisory Panel Member

**From:** angelicafish@aol.com  
**To:** monkfisha6@noaa.gov <monkfisha6@noaa.gov>  
**Subject:** Catch shares  
**Date:** 12/14/2010 9:26:54 PM

Don't use them have you not destroyed enough lives and enough jobs  
already?

Dave Marciano F/V Hard Merchandise  
Sent from my iPhone

Dear Council Members,

I am writing in to comment on the Amendment 6 Scoping Document for monkfish. I am actually disgusted that the Council is even considering a catch share plan for any fishery in New England at this time, considering the devastating consequences and turmoil that groundfish Amendment 16 has been causing since its implementation. When lawsuits and Congressional intervention have become the commonplace result of the Council's current catch share scheme, why on earth would there even be consideration of another? If 75% of the limited access monkfish permit holders are also involved in Amendment 16 catch shares, why not ask them how that is working?

Not one economic impact assessment was conducted by this Council prior to or after Amendment 16, nor has there been any substantive outreach/response to those fishermen to find out how they are truly faring. At a forum held by the New Bedford Standard Times this past November, many fishermen gave voice to what they are facing under the current catch share scheme. But there was not one Council member to be seen. Not one positive outcome of catch shares could be named by any of those fishermen at that forum- which would have been economic assessment right there. I realize that this letter is intended to address the Monkfish Amendment 6 Scoping Document, but I want to seriously highlight the current problems and failures of this Council already as far as catch shares are concerned. I have never once seen a Council member actually down on a dock speaking to fishermen about their situations. You expect those in the fishing industry to take time off work and travel sometimes hundreds of miles to be at your Council meetings, but are you ever actually outreaching to fishermen in their own environment and finding out what is happening on a ground level, listening to what they have to say? As far as fishermen's response to catch shares, what about the study produced at last year's April Council meeting in Mystic? That is the only actual Council commissioned study that I have ever heard of, designed to really find out what the New England fishing industry has to say about catch shares. The responses were overwhelmingly against the implementation of catch shares. But since the Council didn't like the findings, it not only challenged the professors who conducted the study of the integrity of their research, but also swept the whole report under the rug, broke for lunch and refused any public comment period on that section of the meeting! If social and economic scientific study such as that and the report compiled by Dr Julia Olson are ignored, how is the Council meeting its National Standard 8 obligations? Let me remind it again of its legal requirements under federal law- "Conservation and management measures shall...take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2) [the best scientific information available], in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities". Let me remind the Council that both Dr. Olson's paper as well as the study completed and reported at last April's Council meeting in Mystic are currently "the best scientific information available" as far as social and economic impact of catch shares are concerned for this fishery, and to ignore them as such is to breach federal law.

Economic conditions in the New England fishing industry are at an all time low. Fishermen I know are losing everything they've worked for. As a shoreside infrastructure and support industry member, I know we are losing customers because they are being forced out of business. New Bedford alone has lost upwards of 1000 jobs this year due to NOAA/NMFS/ Council actions. This Council needs to think long and hard about the economic impact of its actions before it even attempts to formulate any kind of fishery management plans. The point, according to federal law, is *to keep as many people fishing*

as possible, i.e. "provide for the sustained participation of such communities" and "minimize adverse economic impacts on such communities". Catch share plans have been economically destructive worldwide, and have been so in New England so far. Nothing good has come out of it here, so why would we want to do the same to another fishery? The social and economic requirements of National Standard 8 are designed to protect American fishermen from this type of devastation, but if our Fishery Management Councils refuse to conduct economic impact assessments or abide by federal law, our only recourse is to the courts and our elected officials, as has been the case with Amendment 16. If I were the Council, I would be hesitant to generate more legal action of the same sort, which again indicates a lack of participation/engagement of the fishing industry in the management process.

On this topic, I would like to point out one more thing: of all the "Key References" of this Scoping Document, three were generated by NOAA/NMFS, and three by environmental organizations, including two (EDF and Pew) who have been traditionally at arms with fishermen in New England and are pro catch share. They were the only six references given. Not one reference of this document was generated by the fishing industry itself, or by an independent study performed by a university, or by a factual account of what has happened in other areas of the world or the country where catch shares have been implemented before. That is concerning to me, because from what I was always taught, to give a fair overview of a legal or any other issue, one should have a variety of sources, from many different perspectives. To attempt to pick and choose only self generated and favorable, or a majority of favorable, sources to an argument, is not an argument. It is called stacking the deck.

Furthermore, "technical" concerns with the thought of even the attempt to formulate a catch share plan for monkfish include the fact that monkfish are primarily caught by two types of gear: trawls and gillnets. Under the current days at sea system, trawlers are charged for all travel time plus fishing time. Gillnetters are charged only for travel time and the time it takes to haul their gear and reset it. They are not charged for the time the gear is actually doing the fishing. Consequently, any kind of historical landings data will be skewed, since gillnetters can make their monkfish days last far longer and be more relatively productive than a trawler could. Those boats trawling for monkfish may have a day's steam to their fishing grounds, however long fishing, then a day's steam back to port. Gillnetters, on the other hand, fish closer to shore and can run in and out quickly. To have any type of historical landings allocation, such as under groundfish catch shares, would be biased due to the inequality in the way days at sea are managed for this fishery.

I want to make it clear to the Council that I have no problem with gillnetters per se. I, in fact, have a close friend who gillnets. But I do have a problem with the fact that certain groups would make out well at the expense of others who would make out poorly under a catch shares system, for no conservation purposes at all, since monkfish is not overfished. I happened to talk to a certain gillnetter from the Cape who was pushing for a catch share plan for monkfish due to these facts; he actually gloated that he would be OK at the expense of others who would be pushed out of the fishery. That is not National Standard 8 compliant ("the sustained participation of fishing communities" in the fishery), nor National Standard 4 compliant ("If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be...fair and equitable to all such fishermen").

As a side note, I recently read an article in the Feb. 1, Gloucester Daily Times, which indicated that certain groups of gillnetters would have access to much more capital with which to compete economically under catch shares, than the majority of New England fishermen, gillnetters or not: "The Hook Fishermen's Association — which now fishes primarily with gillnets, not hooks — received three Moore grants totaling \$1,943,548 between December 2005 and September 2007. The largest, for \$912,953 in 2007, was to support implementation of catch shares in New England through promoting regulatory reform and leading the region in sector governance and monitoring." For other fishermen,

particularly trawlers (but also other gillnetters), who do not have such huge amounts of capital or NGO funding, such economic competition would be worrying and potentially devastating.

Finally, monkfish are not overfished, nor is overfishing occurring. But, according to NMFS, it is data poor. So, why try to fix something that isn't broken? Instead, why doesn't the Council/NMFS/NOAA put its energy as far as monkfish go, into doing an actual, up to date assessment? The science /data seems to be the part of the system that is broken. And it is definitely in need of the most immediate attention. I would suggest that such an assessment be conducted by an actual fishing boat through cooperative research. Although the NOAA R/V Bigelow has the capability to tow in deep water, it is not the best vessel for obtaining sound assessments. The Bigelow has a 1300 HP engine. The net it tows is designed for a 500 HP boat. Although the claim is made that the 1300 HP can be tuned down to 750 HP, that is still too much for a 500 HP net. To tow a net too fast causes it to lift off the ground. If the purpose is to catch fish such as monkfish that live on the bottom, and the net does not touch the bottom, the tow is useless and will not catch fish. I am in support of a full blown monkfish assessment, using cooperative research and conducted with an actual monkfish net. Monkfish nets are their own type of net, with long wings designed to corral monkfish, since monkfish corral but do not herd. If an assessment is to be taken, it should be done with the correct gear so as to produce accurate results.

Sincerely,  
Meghan Lapp  
Member AAFC  
Employee ,Shoreside Infrastructure



Dear Regional Administrator,

I am an active participant in the monkfish fishery. Although there is room for improvement within the current system, I do not support moving to a catch share management system. My reasons for taking this position are very important to the future of my livelihood. Although the catch share management system may be a new approach, I feel the end result of this plan would be less fish for me to land. I derive half of my income from monk fishing, and due to faulty stock assessments and past regulatory decisions I have had to endure my available days at sea drop from 40 to 28 in 2004, to 12 in 2006, to 23 currently. These changes in recent years have hampered my ability to provide for the crew and my family, and feel that before we install any new management plan the days at sea that were taken from our permits should be returned to give the permits a baseline of 40 Days per year. According to the monkfish management plan discussion and scoping document, the stock status concluded that both northern and southern stocks are not overfished and overfishing is not occurring. With this in mind, the time is now to return to the permit holders the D.A.S. taken from them in the past.

Why am I against catch Shares? The devil is in the details. Going to catch shares will surely diminish the value of my permit and my ability to make a living. The current management plan allows 23 D.A.S. for my Cat. B permit. If I can land 2984 lbs per trip (each trip figured as a double limit with time consumed averaging 24hrs., 5 minutes) times 22 Days at sea with the last day being a single limit at 15 Hrs. that would total 67,140 lbs. However, that is a reduced amount from the 117,868 maximum available if given the original 40 days the permit had. Naturally, the odds of being able to land that poundage in that time are slim due to the availability of the fish, favorable weather, and effort from other user groups in the immediate area. None the less, as fishermen we strive to reach for the ultimate catch, and under the current system the chance of catching that kind of poundage remains a possibility. If we were to assign a numerical value, poundage wise, to what the permits are worth, we need to keep those poundage parameters in mind. My main concern is that a catch shares management plan would give me a fraction of that available poundage for the year. Such a plan would give each permit a predetermined piece of the pie. The amount of poundage in the pie would most likely be derived from T.A.C figures. Those Figures reflect past stock assignments proven to be faulty in many cases.

Another concern would be the question of how the catch shares plan would be designed. Some of the cost of various program elements may ultimately be passed down to the fisherman, who can ill afford such an expense. Although recently enacted, I have heard some horror stories of the additional expense to vessels involved in sectors, and feel that the catch shares plan could end up traveling down the same path.

Once the catch share plan is implemented and the fisherman is up in arms over such a small catch share, the speed in which such an action can be reversed would be slow at best. The smaller operations would be hit the hardest, most likely selling out to larger share holders who

have the capital, resources and time on their side. This would have a devastating effect on the fishing communities up and down the coast that have suffered enough, and would have the opposite effect on those localities that this plan should be designed to reach out to.

The future of the monk fishery and its relationship to my future is one in the same. My request that the monk permit holders receive the initial allotment of 40 Days would be a good start to healing the cynical attitudes toward fishery management plans of the past. This, in turn, could lead to a healthier dialogue between fishermen and management teams in the future. I would be interested in having a place at any table that ultimately would decide the fishery's future and mine as well.

Sincerely,

Capt. Joe Kelly

F.V. Toots

Permit # 240278

Dear Monkfish Council

My Name is Floyd Gibbs. I own F/V "Papa's Girl", I have a Category H Monk Permit. It took several years of not fishing to finally obtain this permit. We are strictly limited on the area we can fish. Only six Category H Permits were issued. I think the monkfish plan that we have now is working fine. I don't see any reason to change it. I need all the days at sea and pounds I have now in order to be able to make a living and support my family. Anything less and myself and my family are in trouble. If the panel comes up with IFQ's I need the pounds of fish, times, and days at sea that we have now to remain the same. I don't need my permit to be any less than what it is now.

Sincerely, Floyd G. Gibbs

**From:** borntotow@aol.com  
**To:** monkfisha6@noaa.gov  
**Subject:** Monkfish sectors  
**Date:** 01/11/2011 9:30:12 AM

Are you people serious or just blind ? Open your eyes to the catastrophe that is groundfish sectors. As one that is just about out of business, please spare my fellow fishermen from the same devastating situation you have put me in. Jim Keding  
Sent from my Verizon Wireless BlackBerry



**From:** captainjim1@comcast.net  
**To:** monkfisha6@noaa.gov  
**Subject:** No subject  
**Date:** 12/14/2010 3:46:58 PM

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I think all the fisheries should move into catch shares to maximize the dollar amount to the boats that have traditionally participated in that fishery and to slow everyone from jumping into other fisheries and putting too much pressure on it . I think catch shares is the right way to move forward. Thanks, Jim Ford  
F/V LISA ANN II and holder of 6 groundfish permits  
Sent from my BlackBerry® smartphone with Nextel Direct Connect

**ASSOCIATED FISHERIES OF MAINE**

PO Box 287, South Berwick, ME 03908

207-384-4854

February 11, 2011

Ms. Patricia Kurkul, Regional Administrator  
National Marine Fisheries Service  
55 Great Republic Drive  
Gloucester, MA 01930

RE: Scoping Comments on Monkfish Amendment 6

Dear Pat,

Thank you for the opportunity to provide comments on behalf of Associated Fisheries of Maine (AFM) regarding the pending Amendment 6 to the Monkfish Fishery Management Plan (FMP). Members of AFM have a long standing interest in the sustainability of the valuable monkfish resource.

Our comments will answer specific questions posed in the scoping document.

General questions:

*1) How well is the management program for monkfish working?*

According to the last two assessments, the monkfish rebuilding program has been completed ahead of schedule, and overfishing is not occurring.

However, the current management plan could be improved to address the economic needs of businesses and communities historically dependent on the resource, to promote efficiency, to align with groundfish management, to address the discard issues inherent in trip limit management, and to decrease impacts on habitat and protected species.

*2) If you support moving to a catch share management system to solve some of these problems:*

*a) What are your goals and objectives?*

Goals and Objectives of catch share management:

- Sustainable management of monkfish fishery
- Minimize discards
- Full utilization of monkfish resource (optimum yield)
- Improve economic viability
- Promote safety
- Promote consolidation to improve efficiency, decrease habitat impacts, and decrease impacts on protected resources

- Acknowledge time and capital investment in the fishery of historic participants
- Align monkfish management with groundfish management

*b) What do you see as the benefits and potential costs to both you and to the fishery as a whole?*

Benefits would include achieving objectives stated above. Costs would likely be related to an increase in monitoring. Increased monitoring, however, could also benefit stock assessment by improving catch/discard information.

*c) What type of catch share management program would work best for the monkfish fishery in your area?*

Members of AFM would prefer an individual transferable quota (ITQ) allocation and management program, but in the interest of expediency, would default preference to a sector allocation program. A catch share program in monkfish would improve the existing groundfish sector management program.

#### Catch Share Program Specific Questions:

In the early development of Amendment 5 to the Monkfish FMP, the Monkfish Committee and Monkfish Advisory Panel made considerable progress in the development of a sector and/or ITQ allocation and referendum proposal. AFM recommends that the Councils use that proposal as a starting point, while incorporating constructive comments and recommendations received during the scoping process. For example, we recommend that the draft proposal incorporate an additional allocation timeframe for the northern fishery management area that would be consistent with the allocation timeframe used for groundfish that is 1996-2006. Allocations should be made to vessel owners only. AFM strongly supports allocations based on landings history only, as this best addresses the economic needs of those businesses and communities most dependent on the resource.

As always, we appreciate your consideration of our views.

Sincerely,

*M. Raymond*

Maggie Raymond  
Associated Fisheries of Maine

**DAVID G. FYRBERG**  
107 Middle Street  
West Newbury, MA 01985

February 14, 2011

**Re: Scoping Comments on Monkfish Amendment 6**

I am in favor of an ITQ for monkfish management for the following reasons:

At the moment management is skewed towards the inshore small boat gillnet fleet that utilizes DAS counting of 24 hours + 1 minute to land (2) possession limits. However, the offshore fleet of draggers and gillnetters cannot take advantage of this option as they are on real time counting and can only use the "24 + 1" scenario on the last day of a multi-day trip. My vessels usually fish 100+ miles from shore in both the northern area and the southern area, with a minimum of 3½ days needed to make a round trip of hauling and re-setting the gear, and that is without any unforeseen problems that could lengthen the trip. The proposed higher daily limits in the northern area help address this problem, but the concurrent cost of multi-species days needed to fish in a non-exempt area is still problematic. In addition, the low daily possession limit in the southern area without the benefit of the "24 + 1" precludes the offshore fishery altogether, as the cost of operation (fuel, etc) makes it unprofitable.

As an offshore gillnetter, I prefer not to fish on the inshore spawning stocks in the spring. I would rather pursue these fish at another time of the year when the market responds to the better quality. Therefore, I would prefer an ITQ that would allow me to pursue this fishery in an economical and responsible manner.

In regards to the time frame to be used to determine historical effort, I prefer a ten year period from 1996-2006 which would coincide with the current groundfish management plan, or 1998-2008, which coincides with the initial issuance of monkfish permits in 1999, as well as accommodates new entrants. I believe that those who are advocating for a 2003-2007 timeframe are self serving and wish to preclude historical participants for their own gain.

Respectfully submitted,

David G. Fyrberg



**From:** Jon Pattee <charlottethedog@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Support for catch shares for monkfish  
**Date:** 02/02/2011 4:30:25 PM

It's the only way to have fishing jobs and healthy fisheries in the long term.  
I wholeheartedly voice my support for catch shares in the monkfish fishery.

Jon Pattee  
3209 Shepherd St.  
Mount Rainier, MD 20712

January 31, 2011

Proposal for ITQ in the Monkfish Fishery:

This is an open letter to all participants of the monkfish fishery. The New England and Mid-Atlantic fisheries management councils have given us an opportunity to amend the monkfish management plan. This gives us the opportunity to initiate an individual transferable quota [ITQ]. ITQs would allow us to fish responsibly and make important business decisions for the future. I would like to take this opportunity to initiate a discussion of where to go and how to get there.

- The single largest objection to a monkfish ITQ is that permit holders are afraid of losing quota. Eligibility for participation in a monkfish ITQ should be based on the current permit qualification. Those of us with significant economic investment in the monkfish fishery have already been issued a permit based on our participation in the fishery before it came under management. The ITQ program should be based on our original allocation tied to our permits.
- Each vessel participant should have a maximum limit of three permits purchased or leased from ITQ participants. This ownership cap would be approved by NMFS after receiving a letter authorizing the transfer of a percentage or the whole permit quota and a letter from the owner of the receiving vessel accepting the whole or percentage of the quota. The percentage of quota leased or sold would be accompanied by the transfer of the percentage of net tags involved.
- The number of tags issued should be eighty per vessel. Any vessel with two whole permits would be issued an additional forty tags. A vessel with three permits could have an additional twenty tags or a total of one hundred and forty. This will stabilize the price of monkfish by preventing too much product entering the market at any one time and will allow vessels to bring to market what is caught each day instead of having to leave fish behind when a daily limit has been reached.
- Vessels that opt to continue with the day at sea program will continue to have a daily limit while achieving quota. The vessels that participate in the ITQ program have the net limit to prevent a price drop. Vessels that participate in the ITQ program and participate in other fisheries that have a by catch of monkfish will have to set aside ten percent of their quota or as much as is necessary to not exceed their individual quota. No vessel may participate in a fishery that has a by catch of monkfish once that vessel, or combined vessels, have achieved their quota.
- Logbook [VTR] reporting, dealer reporting, observer and dockside monitoring will continue. Once a vessel has caught eighty percent of its quota, a weekly report will have to be mailed to NMFS. If additional funds are needed to facilitate this program, I would suggest an auction of scientific quota and a percentage of additional quota to meet the financial needs of the program.

I offer this proposal as an effort to begin discussion of how an ITQ would work. I believe the day at sea program needs to end in order to prevent waste and accidents. We deserve a better program that allows us to make business decisions for the future. This type of program will work only if a large number of people are willing to get involved - so let's get to work. This is a political process - so get involved and make your preference known.

Thank you,

Bill Mackintosh

F/V Thistle  
PO Box 961  
Little Compton, RI 02837

From: JDHLCL@aol.com  
To: monkfisha6@noaa.gov  
Subject: Fwd: (no subject)  
Date: 02/02/2011 8:24:36 PM

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From: JDHLCL@aol.com  
To: fvperception@juno.com  
Sent: 2/2/2011 4:43:43 P.M. Eastern Standard Time  
Subj: (no subject)

Ms. Kurkul,  
I am the owner and operator of a 100 foot trawler homeported in Montauk, New York. I am sending this e-mail in regards to amendment 6 to the monkfish management plan..

I represent the forgotten user group in this entire equation. As one of the pioneers of the deep water mid-atlantic monkfish trawl fleet, I would like to submit these comments:

I did attend the Riverhead New York scoping meeting and do agree with a lot of what was said and I will requote some of it as well.

1. As the operator of a larger trawl vessel, that was one of the first on the east coast to harvest deep water monkfish, and then, basically, have it taken away and given to 45 foot boats, I would like to see a

straight ITQ program. The deep water fishery was and still is a bycatch free fishery, that has, with no scientific justification, been reduced to nothing more than a bycatch fishery for larger boats. We need to catch more fish on our monkfish days and save fuel...

2. As a member of a groundfish sector, I am absolutely against them. The plan was not given enough fore thought and I don't believe the monkfishery is ready for its ruination, like the groundfisherman are experiencing. Sectors are very expensive and are leading to the extinction of the independent owner operator.

3. If the service moves ahead with any plan, I believe it is imperative to follow the qualifying years used in the groundfishery. That is 1996-2006...

4. I believe the data the service has presented is very poor and needs an extensive review before moving forward with any plan.

5. I question how the service intends to deal with potential choke species like skates if moving forward with a sector or catch share system is implemented.

6. If we move ahead with any new allocation method, I would like a delineation between Northern and southern areas included.

7. TIME CLOCK: The service must look very carefully at the injustice that has been served to the trawl fleet. As trip limits have been set so low, many draggers have not bothered to steam the 8-10 hrs to the grounds to land their 550lb allocation, while the small boat gillnetter has thrived. Actually, in past years, gillnetters were completing a trip in less than 3

hours!!!! Thus turning 40 days into (only you and they know how many trips)!!!

This issue leads to a tremendous injustice of landings history.

8. Lastly, A Mr. Larocca from Hampton Bays, New York brought up



a very interesting point. That is The Endangered Sturgeon. He stated he catches lots of them. I think this should be looked at VERY carefully. Maybe a lot more of this bycatch filled inshore fishery should be allocated to the offshore fisherman who have been deprived of this recovered resource,.... The offshore fleet, the very user group that has developed the science, to justify quota increases, is being needlessly discriminated upon..

Thanks,

Hank Lackner  
F/V Jason & Danielle

**From:** JDHLCL@aol.com  
**To:** monkfisha6@noaa.gov  
**Subject:** Fwd: (no subject)  
**Date:** 02/02/2011 8:24:35 PM

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**From:** JDHLCL@aol.com  
**To:** fvperception@juno.com  
**Sent:** 2/2/2011 4:43:43 P.M. Eastern Standard Time  
**Subj:** (no subject)

Ms. Kurkul,

We are the owners and operators of 80 foot and 100 foot trawlers homeported in Montauk, New York. I am sending this e-mail in regards to amendment 6 to the monkfish management plan..

We represent the forgotten user group in this entire equation/potential allocation grab bag. As one of the pioneers of the deep water

mid-atlantic monkfish trawl fleet, I would like to submit these comments:

We did attend the Riverhead New York scoping meeting and do agree with a lot of what was said and I will requote some of it as well.

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2. As members of a groundfish sector, we are absolutely against them. The plan was not given enough fore thought and we don't believe the monkfish fishery is ready for its ruination. We groundfisherman are already dying from the growing pains. Sectors are very expensive and are leading to the extinction of the independent owner operator.

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more of this BYCATCH filled inshore fishery should be allocated to the offshore fisherman who have been deprived of this recovered resource.....The offshore fleet, the very user group that has developed the science, to justify quota increases and , is being needlessly discriminated upon..

Thanks,

Hank Lackner, Bill Grimm  
F/V Jason & Danielle , F/V 2

Sea Sons  
, F/V Perception

12/16/10



PHIL HARING

NEFMC

Phil, I have learned that a segment of the fixed gillnet gear fishery for monkfish is using research DAS to supplement their season. This program is necessary for funding research, but I believe should be pursued in a manner that does not affect other fisherman fishing in close proximity to them.

The current system allows research DAS and monk DAS to be used concurrently which basically eliminates the constraints of the trip limits. These trip limits keep the amount of gear fished to manageable levels, and give no incentive to exceeding the net limit. These trip limits keep large concentrations of gillnetters on an even playing field as well as give some civility to a competitive fishery.

Please consider changing the current system to allow research DAS to be used separately and under current trip limits

JAMES BRINDLEY  
BARNEGAT LIGHT N.J.



**From:** Bob Cooley <bobcooley@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Re: Opposition to catch shares for monkfish  
**Date:** 02/02/2011 9:58:02 AM

the world needs to know the truth. Let the world know the truth, put information on Youtube, the world news agencies listen to videos that have a large number of hits. The masses of people want real fish not farm raised genetically modified fish. The masses want organic fresh food not corn syrup false food.

Best.

Bob Cooley

On Wed, Feb 2, 2011 at 3:51 PM, <monkfisha6@noaa.gov> wrote:

> Thank you for your input on the development of Monkfish Amendment 6.  
>

--

...becoming flexible in all ways.



Feb-15-11

03:06pm

From-Hoffman Silver Gilman &amp; Blasco P.C.

+7035270421

T-872

P.001/003

F-398

## HOFFMAN SILVER GILMAN & BLASCO P.C.

Washington, D.C. · Juneau, AK · Anchorage, AK

2300 CLARENDON BLVD, SUITE 1010

ARLINGTON, VA 22201

Phone: 703-527-4414

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### FAX

|                                                    |                       |                  |
|----------------------------------------------------|-----------------------|------------------|
| To: Ms. Pat Kulkul                                 | NO Regional<br>OFFICE | From: Rick Marks |
| Fax: 978-281-9135                                  | Date: 2/15/11         |                  |
| Phone:                                             | Pages 3               |                  |
|                                                    | Code: 9-9             |                  |
| Re: Comments on Monkfish Am 6 Catch Share Document |                       |                  |

Please accept the attached comments on  
Monkfish Am 6.

Thank you  
RM

If any problems were experienced, please call, 703-527-4414

February 15, 2011

Ms. Patricia Kurkul, Regional Administrator  
NOAA/National Marine Fisheries Service  
55 Great Republic Drive  
Gloucester, MA 01930  
*via facsimile to 978-281-9135*

**RE: Monkfish Amendment 6 Catch Shares Scoping Document Comments**

Dear Ms. Kurkul:

We urge the New England and Mid-Atlantic Fishery Management Councils and the National Marine Fisheries Service to work closely with affected full time fishermen and shore side, non-vessel community infrastructure to determine the most suitable options for the future of the monkfish fishery in each management area.

As processors and dealers located in primary and secondary monkfish ports, we historically handled substantial amounts of monkfish and have come to depend on continued participation in this fishery. In some cases monkfish revenues constitute a significant portion of our businesses and we have invested in our shore facilities to improve our ability to handle monkfish efficiently. For example, in Barnegat Light, NJ monkfish revenues can account for up to 40% of the total annual revenue of the entire port. In Portsmouth, NH monkfish landings can account for nearly 50% of the port revenues in a given year.

Naturally, our companies are closely intertwined with our fishermen. We provide shore side support and supplies, transportation, freezing and cold storage capabilities, access to global markets and at times, financing needs. In addition, we provide job opportunities in our coastal communities. We recognize the cultural and social importance of sustaining historic participation of our small owner-operator vessels as well as our coastal infrastructure.

We also recognize that many of our fishermen from both management areas are not in support of a monkfish catch share program. We support these fishermen. We prefer to allow full-time fishermen and community-based support businesses in each management area to decide what works best for them via a "bottom up" process. We believe that it is entirely possible for the NFMA to operate under a catch share (or sector) program while the SFMA remains under a separate and distinct limited access program to preserve the smaller-scale characteristics of the southern fishery.

However, if a catch share program is to be developed for the monkfish fishery in either management area we strongly recommend the Councils and NMFS work cooperatively with fishermen and shore side infrastructure to consider creative alternatives to the individual allocation system. Such approaches could include non-vessel allocations for dealers/processors, area-based allocations for a group of individuals in close proximity, as well as regional/community-based associations as specified in the Magnuson-Stevens Act.

Many of these catch share alternatives can provide protection for fishermen and the businesses that support their activities and we request they be made a part of the catch share debate. Thank you for the opportunity to comment on the Amendment 6 Scoping Document to the Monkfish FMP.

Sincerely,

Marc Agger, Agger Fish Company, Inc., Brooklyn, NY

Steve Barndollar, Seatrade International, Inc., Portsmouth, NH

Kirk Larsen, Mayor, Barnegat Light, NJ

Ernie Panacek, Viking Village, Inc., Barnegat Light, NJ

Jeff Reichle, Lund's Fisheries, Inc., Cape May, NJ





Food & Water Watch • 1616 P St. NW, Suite 300 • Washington, DC 20036  
www.foodandwaterwatch.org • T: +1.202.683.2500 • F: +1.202.683.2501

Attn: Patricia A. Kurkul  
Regional Administrator  
NMFS, Northeast Regional Office  
55 Great Republic Dr.  
Gloucester, MA 01930

Feb 11, 2011

**Re: Scoping Comments on Monkfish Amendment 6, RIN 0648-BA50**

Food & Water Watch (FWW) is a national consumer action organization that defends and advocates for robust public management of natural resources, including fish. We are writing to urge the New England and Mid-Atlantic Fishery Management Councils to rethink the use of a catch share program for the jointly managed monkfish fishery via Amendment 6. Below, please find FWW's comments regarding the proven negative consequences of fishery privatization and the potential consequences for monkfish and those that fish for them if a catch shares program is adopted.

Catch share systems as implemented throughout the United States and the world have typically resulted in an unfair giveaway of public resources to private entities. The gains in economic efficiency hailed by supporters of catch shares have come at the expense of the livelihoods of thousands of smaller-scale, traditional fishermen and their communities, and the claims of increased fishery sustainability and safety are a topic of continued academic debate. The design of catch share programs may violate guiding provisions within the Magnuson-Stevens Fishery Management Act, and have been found to violate human rights in international court.

While FWW believes that catch share-like programs can be one of many effective tools in addressing the modern challenges of fishery management, these programs must be rigorously designed to ensure that they retain public control of the fisheries resources and return a portion of the value of each fishery to the public. Allocations to fishermen must be fair and equitable, and the programs should include incentives to maintain a diverse fleet, minimize damage to the environment, and allow new participants in the fishery.

FWW urges the Council to reconsider the implementation of catch shares for monkfish until there is meaningful guidance on designing catch share programs in the United States to address the concerns stated herein. At the minimum, the Council must rigorously and broadly consider the environmental, economic, and social consequences of catch share programs, and explore all possible alternatives to catch share programs that privatize our nation's public resources.



### **Economic Devastation**

***The initial distribution of shares can create windfall profits for a select few and moves the fishery towards rapid consolidation that further disadvantages smaller scale fishermen. To avoid these consequences (detailed below), the New England Fishery Management Council (NEFMC) must ensure that catch share program design includes strict limits on transferability and consolidation, includes a tiered distribution of shares to preserve fleet diversity, and does not give away catch shares in perpetuity. The NEFMC should explore alternative management strategies that have fewer of these negative consequences.***

Catch share programs are justified by the idea of maximizing the economic efficiency of a fishery. Unfortunately, this “optimization” or “rationalization” comes at the cost of excluding large numbers of people from the system entirely. Shares in a new catch share fishery are typically distributed proportional to historical catch records. Those who receive the largest initial distribution of shares — or have the most capital to buy and lease shares — often gain control over an entire fishery, pushing smaller fishermen out of fishing and even into bankruptcy.<sup>1</sup> These privileged few may sell their quota and gain an instant profit,<sup>2</sup> or use the expected value of quota as collateral to get loans from a bank.<sup>3</sup> Anticipation of a new catch shares program can distort these statistics, as it prompts new fishermen to enter the fishery and current fishermen to increase their catch, a behavior termed “fishing for history.”<sup>4</sup>

Once quotas are distributed, the fishery moves rapidly toward consolidation. In 2010, less than five months after catch shares were implemented in the groundfish fleet in New England, 55 out of the initial 500 boats in the fishery controlled 61% of the revenue.<sup>5</sup> In another example, the ocean quahog fishery in the mid-Atlantic became so consolidated that one firm controlled 35 percent of the available quota two years after the program began.<sup>6</sup> Many quota holders don’t even fish themselves. Instead they become “armchair fishermen” or “fishery landlords” by leasing their quota for exorbitantly high prices. The Canadian halibut fishery switched to a privatized catch share system in 1991, and by 2006 a total of 79 percent of the quota was leased out instead of being fished by quota owners themselves.<sup>7</sup> Quota leasing has become the single largest operating cost for these fishermen, pushing them to the margins of profitability,<sup>8</sup> which could drive more fishermen into bankruptcy.<sup>9</sup>

Fishermen in Iceland who had been excluded from their country’s catch share system took their grievances before the United Nations Human Rights Committee, alleging that privatization violated the International Covenant on Civil and Political Rights by forcing





fishermen without quotas to pay money to a privileged group of citizens (the quota holders) in order to pursue their occupation. After reviewing the issue, the Committee ruled that privatized catch-share systems violated international law.<sup>10</sup>

***Consolidation of the fleet translates into widespread job losses and reduced wages for fishermen and crew. NOAA and the NEFMC must acknowledge that catch shares programs cause job losses, and widely inform stakeholders of the negative economic consequences of fleet reduction. Effective fisheries management strategies must minimize these adverse effects by preserving job opportunities within the fishery. The NEFMC should explore alternative management strategies that do not lead to significant unemployment for fishermen.***

As a result of consolidation, many fisheries have lost well over half of their fishing fleets. In Alaska's Bristol Bay king crab fishery, only 89 out of 251 boats remained the year after catch shares were implemented.<sup>11</sup> In early 2010, New England implemented catch shares in the groundfish fishery through a "sector" program, and the community warned that "50-75 percent of the fleet and thousands of jobs will be lost in a relatively short period of time."<sup>12</sup> Five months after the program was implemented, 253 of the 500 boats in the fishery were just sitting at the dock, unable to fish without quota.<sup>13</sup>

#### **Fleet Reduction Means Job Losses**

"Fleet reduction" — meaning fishermen being cut out of fishing — is often highlighted as a success of IFQ programs.<sup>14</sup> But every time a boat stops fishing, an estimated 3 to 6 jobs are lost,<sup>15</sup> resulting in struggling coastal and fishing communities.

| <b>IFQ Program</b>                            | <b>Boats in fishery prior to IFQ</b>         | <b>Boats in Fishery after IFQ</b>           | <b>Boats lost</b>                                              |
|-----------------------------------------------|----------------------------------------------|---------------------------------------------|----------------------------------------------------------------|
| Alaska Halibut                                | 3450 boats in 1994                           | 1156 boats in 2008                          | 66% in 14 years                                                |
| Alaska Sablefish                              | 1404 boats in 1994                           | 362 boats in 2008                           | 74% in 14 years <sup>16</sup>                                  |
| Bering Sea and Aleutian Islands Pollock       | 100 catcher and 30 catcher-processor in 1998 | 90 catcher and 21 catcher-processor in 2005 | 10% catcher and 30% catcher-processor in 7 years <sup>17</sup> |
| Bering Sea and Aleutian Islands red king crab | 251 boats in 2004                            | 74 boats in 2007-2008                       | 71% in 3-4 years                                               |



|                                           |                     |                           |                               |
|-------------------------------------------|---------------------|---------------------------|-------------------------------|
| Bering Sea and Aleutian Islands snow crab | 189 boats in 2004   | 78 boats in 2007-2008     | 59% in 3-4 years              |
| Pacific Sablefish                         | 328 boats in 2000   | 87 boats in 2008          | 73% in 8 years <sup>18</sup>  |
| Gulf of Mexico Red Snapper                | 546 permits in 2007 | 466 permits in 2008       | 15% in one year               |
| Wreckfish                                 | 91 boats in 1990    | Less than 5 boats in 2009 | 95% <sup>19</sup>             |
| Surf clam                                 | 128 boats in 1990   | 50 boats in 2005          | 61% in 15 years <sup>20</sup> |
| Ocean Quahog                              | 92 permits in 1991  | 47 permits in 2005        | 49% in 14 years <sup>21</sup> |

Despite widespread academic agreement that catch share programs create job loss in communities, NOAA Administrator Jane Lubchenco recently announced that catch shares are “merely a tool” and “not the cause” of lost fishing jobs.<sup>22</sup>

The precise impacts of catch shares on crew are relatively unknown, but the research that has been done belies the claim that crews have safer, better jobs with higher wages.<sup>23</sup> Vessel owners are shifting the costs of leasing additional quota onto crew by taking a large percentage of the total catch value before calculating wages. The crew of the Canadian halibut fishery received 10-20% of the catch value before catch shares, and now receive only 1-5 percent.<sup>24</sup> Even the quota owners who continue to fish their own quota have begun to pay their crew less, justifying this change by arguing that paying higher wages would make leasing their quota (and firing their crew) more profitable than fishing it themselves.<sup>25</sup> So, in the Canadian halibut fishery, although the overall value of the fishery has increased by 25 percent over 17 years, the crews’ share of that value has dropped by 73 percent.<sup>26</sup> In the Bristol Bay red king crab and Bering Sea snow crab fisheries, some crew members report that pay has dropped from 5-6 percent of catch value to less than 1 percent,<sup>27</sup> while an estimated 1,214 crew members lost their jobs entirely after IFQ implementation in those fisheries.<sup>28</sup>

***Catch shares can hurt communities and prevent new fishermen from entering the fishery. The NEFMC must ensure that catch share programs are designed to follow all of the guidelines in the Magnuson-Stevens Act to prevent individual and community economic hardship. Further, the NEFMC must include all likely community effects of consolidation and job loss in its economic assessments of the proposed program.***





The Magnuson-Stevens Fishery Conservation and Management Act specifies that all fishery management plans must “take into account the importance of fishery resources to fishing communities...in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.”<sup>29</sup> And that catch shares programs must provide for “fair and equitable initial allocations” of quota, prevent “excessive” consolidation, and set aside portions of the catch for entry-level fishermen, small vessel owners, and crew.<sup>30</sup>

But catch share programs have widely failed to meet these criteria. The economic hardship and job loss among fishermen due to catch share programs have widespread impacts — related industries like processors, baiters, and boat repairers also suffer, along with the ports and communities reliant on fishing. As unemployment spreads, there is less to spend at grocery stores, restaurants, and other key community businesses, which can eventually lead to a resident exodus in search of jobs and opportunity.<sup>31</sup> A study of the Nova Scotia mobile gear groundfish catch share program found that transferability of shares resulted in striking regional imbalances in consolidation, as some areas acquired quota at the expense of other towns and ports.<sup>32</sup> The increasing fortunes of those able to take advantage of catch shares in these communities have exacerbated disparities of wealth and status and put a strain on the values of hard work and equity that held the communities together.<sup>33</sup>

Quota leasing and purchasing also prevents new fishermen from entering the fishery. One study estimated that it can cost between \$250,000 to \$500,000 for a new entrant to lease enough quota for a single fishing trip in Alaska’s halibut fishery.<sup>34</sup> Fishermen who already have quota can use their existing quota as leverage for loans, but fishermen just starting out may have to use personal assets, such as their homes, for the required down-payment (between a quarter and half of the loan, or \$62,500 to \$250,000) before they can even catch any fish.<sup>35</sup> Purchasing the quota outright is out of the reach of most, since widespread leasing drives up the price of quota.<sup>36</sup>

***It is not clear that catch shares increase fishermen safety. The NEFMC should acknowledge that safety improvements due to catch shares are not guaranteed, and are unlikely in fisheries not already compromised by a “race to fish.”***

Catch shares are touted as a sure method for increasing fishermen safety,<sup>37</sup> but the data is unclear that such programs reduce accidents and deaths at sea.<sup>38</sup> The anticipated safety benefit of catch shares systems is that fishermen no longer have to race for fish. However, a survey of fishermen safety in six countries found that some catch shares-managed fisheries, especially those with quota aggregation and quota leasing, tended to continue to have major vessel accidents and fishing fatalities.<sup>39</sup> Overall, the data is mixed. Some





fisheries have experienced reductions in search and rescue missions (for example, Alaska's halibut and sablefish fishery saw a 63% reduction in missions after catch shares were implemented),<sup>40</sup> while others have seen no improvement (fisheries in Iceland, New Zealand, and some U.S. fisheries maintained high accident rates).<sup>41</sup>

### **Fishery Health**

***Privatization of a natural resource, like fish, does not ensure or even improve the chances that it will be better managed for conservation. Catch share systems do not ensure the recovery of fish stocks or prevent them from collapsing. The NEFMC must distinguish between conservation measures, such as a Total Allowable Catch (TAC), and management strategies such as catch shares. The NEFMC should avoid privatization of the monkfish fishery by exploring alternative management strategies, and use any new management strategy to incentivize ecologically responsible fishing and gear types.***

The National Resource Council concluded in 1999 that “much of the political support for IFQs is similarly driven by faith in the assumption that privatization will foster ecological sensibility.”<sup>42</sup> The NRC felt that catch shares may promote conservation by keeping catch below the total allowable catch, but only so long as there exists proper monitoring, enforcement, and penalties for violators.<sup>43</sup> As highlighted in their opinion, the key management strategy to ensure conservation is the existence of a biologically based TAC, while catch shares is just one way, but not the only way, to implement this conservation strategy.<sup>44</sup>

One widely cited study that suggested catch share programs are the solution to wide-scale fisheries collapse<sup>45</sup> has been criticized for failing to differentiate between landings increases due to catch shares management and landings increases due to the enforcement of a sustainable catch limit.<sup>46</sup> An opposing study painted a much more complicated picture. Looking at fish numbers, use of habitat-damaging gear and commercial landings data in fifteen North American catch share programs, the author concluded that results varied widely between programs, and that the implementation of catch shares – in 15 separate regional examples – did not ensure ecological sustainability.<sup>47</sup> A third researcher looked at stocks in 20 international catch share programs and found 8 that continued to decline.<sup>48</sup>

Fish populations under some of the most mature ITQ systems in the world are still overfished. In New Zealand, the percentage of assessed stocks below target levels increased from 15% to more than 30% between 2006 and 2010. In 2010, almost a quarter of New Zealand fish stocks experienced overfishing, six percent of them were collapsed and 13 percent were depleted.<sup>49</sup> In another example, Norway's cod stocks dropped to their lowest quota ever available in 2006 after years of catch shares management.<sup>50</sup>





***Catch share programs inherently include incentives to discard and “high-grade” fish, which can distort stock assessments and can only be countered through expensive monitoring and enforcement programs. The cost of these programs may further disadvantage small fishermen. The NEFMC must acknowledge that catch share programs likely increase high grading and discarding and include all projected costs for stock assessments, monitoring, and enforcement in any proposed catch share program. Any proposal for a catch share programs should make it explicitly clear what the expected increased burden of monitoring will be on individual fishermen.***

Stocks continue to decline because the very design of most catch shares programs includes incentives to discard some of the catch. By restricting fishermen to the amount of fish in their quota and making it too expensive to acquire additional quota, fishermen may discard smaller fish that will bring in less profit at the dock. This process, called “high-grading,” can result in the death of many fish, which are tossed overboard, depleting fishing stocks while yielding no profit for fishermen. Similarly, “bycatch” — ocean wildlife that is unwanted or illegally caught while fishing other species — is also discarded and has undermined fishery recovery efforts.

Discarding and high-grading have been described as “an almost inevitable outcome of quota-managed fisheries,”<sup>51</sup> and the implementation of catch shares typically increases incentives to discard and high-grade, particularly in multi-species fisheries like the New England and Mid-Atlantic monkfish fishery.<sup>52</sup> Low-impact fishing with lower bycatch and high-grading could be incentivized through fisheries management, but the reverse is currently happening: larger boats with less selective fishing methods are becoming dominant in the new privatized and consolidated catch share fisheries around the world.

The success of catch shares programs depends significantly upon monitoring both quota and non-quota holders that fish in related fisheries. Unreported landings, high-grading, and discarding weaken and can destroy the market for quota shares.<sup>53</sup> One of the only fisheries with significant and proven reductions in discard rates is the multispecies groundfish trawl fishery in British Columbia, which has 100% at-sea observer coverage and dockside monitoring.<sup>54</sup>

The United States struggles with monitoring and enforcement. In recent years, the National Marine Fisheries Service (NMFS) only analyzed 66 fishing trips of catch shares program vessels in the Gulf of Mexico red snapper fishery in 2009, and 55 trips in 2008.<sup>55</sup> In 2009, 1,898 red snapper were kept while 2,245 (over half of the total catch) were caught accidentally and then discarded, were discarded dead, or met some other unknown fate besides being sold at dockside.<sup>56</sup> These bycatch numbers were significantly worse than those in 2008,<sup>57</sup> when only about a quarter of the total red snapper catch was discarded, indicating that catch shares do not minimize bycatch problems over time and might





actually make it worse.

The National Resource Council suggested catch shares programs could improve monitoring and enforcement by levying fees to fund on-board and/or dockside monitoring programs.<sup>58</sup> New catch shares programs in the U.S. are looking for ways to pass those costs on to fishermen, but the systems proposed could only further hurt small fishermen. For example, in the New England sectors program, which the NRC highlighted as one of the most difficult regions to monitor and enforce (due to the large number of small boats and numerous ports),<sup>59</sup> the necessary improvements for monitoring the catch shares program were estimated by a local research institute to cost between \$6 million and \$12 million.<sup>60</sup> While the federal government will be subsidizing much of the initial implementation,<sup>61</sup> on-board observer costs are estimated to stay at \$700 to \$1,000 a trip<sup>62</sup> – a price that large quota holders will have few problems paying, but smaller fishermen already working at the margins of profitability, particularly with the additional costs of quota leases, may not be able to endure. Without long-term federal support, monitoring costs could drive the remaining small fishermen out of the industry.

#### **The New England and Mid Atlantic Monkfish fishery**

***New England fishermen are already experiencing significant economic devastation from the implementation of the groundfish sectors program which is currently in litigation and loudly opposed by many smaller-scale historic fishermen. The NEFMC should not further restrict fishing opportunities for struggling fishermen by implementing a catch shares program for monkfish. If it does proceed with a catch shares program, it should not use the groundfish sectors program as a model, as it is significantly flawed. The NEFMC should consider all alternative management strategies.***

According to the public notice for this scoping period, “Nearly 75-percent of limited access monkfish permit holders also hold a limited access permit in the Northeast multispecies fishery, where a catch share program (in the form of sector management) has been implemented. As a consequence, many monkfish permit holders have requested that the Councils consider a catch share program in the monkfish fishery to coordinate the management and improve the performance of both fisheries.”<sup>63</sup>

The NEFMC suggests that it is stakeholders that want to extend catch shares to monkfish, but there is not widespread community support for this action. In a recent public meeting between the NEFMC and stakeholders in the fishery, “the proposal found little favor, as fishermen, boat owners and fish dealers rose to oppose the expansion of catch shares to another fishery, while roundly condemning the existing management plan in the groundfish industry which, they say, has created only hardship for many fishermen.”<sup>64</sup> The Northeast multispecies fishery has already caused significant job losses and consolidation of profits. In just five months, 253 of the initial 500 boats are sitting idle while 55 of the





boats now control 61% of the revenue,<sup>65</sup> and those cut out of the fishery already do not support the expansion of these job-killing programs.

***Referenda for catch share programs have been fraught with problems, as smaller-scale fishermen are typically under-represented, and even intentionally excluded. The NEFMC and MAFMC must ensure that all fishermen with a stake in the fishery are allowed to vote on the implementation of a catch shares program, not just those running large operations.***

The use of income and catch level to determine voter eligibility for a catch shares referendum can exclude small-scale fishermen from the voting process unless deliberate measures are taken. The NEFMC uses the Gulf of Mexico Fishery Management Council's commercial grouper and tilefish referendum as a model,<sup>66</sup> but this vote was fraught with problems.

In the Gulf referendum, the only fishermen allowed to vote were those who had an active or renewable commercial Gulf of Mexico reef fish permit and a combined average annual grouper and tilefish landings of at least 8,000 pounds during the 1999-2004 period. This excluded approximately 69 percent of permit holders in the Gulf—the majority of fishermen whose livelihoods would be affected should the plan be implemented. Only those fishermen who were most likely to directly benefit from the management program could vote. Not surprisingly, the measure passed overwhelmingly.

FWW sent our own survey to Gulf permit holders, and our “re-referendum” returned starkly different results: 88.37 percent (152 respondents) said they would have voted against the IFQ program and only 6.98 percent (12 respondents) said they would have voted in favor of it. Eight respondents, or 4.65 percent, had no opinion.<sup>67</sup>

The survey also asked fishermen if they believed that the Gulf of Mexico Fishery Management Council was managing the Gulf of Mexico reef fish resource in a manner that benefits public interest. Ninety percent (154 respondents) said no, 7 percent (13 respondents) said yes, and 3 percent (5 respondents) had no comment.

The lesson is clear: the level at which “significant” investment in the fishery is set by a council will determine if smaller scale fishermen, who likely have the most to lose in the implementation of a catch share program, will even have the right to vote.

Monkfish is typically caught incidentally, and there are few directed fishery participants. These direct fishery participants earn a lower tier of income than fishermen participating in the broader groundfish fishery, so eligibility criteria for participation in the referendum should reasonably reflect their lower income.

In addition, it is possible that some fishermen now struggling because of the NE sectors program will turn to or intensify their efforts in non-quota regulated fisheries (like monkfish) to try to make ends meet. These fishermen may not be represented in voter referenda that only look at past income or past catch history. Further restricting access to northeastern fisheries is an unnecessary step that will only hurt these fishermen more.





### **Final Recommendations**

FWW urges the NEFMC to withdraw its proposal to implement catch shares in the New England and Mid-Atlantic monkfish fishery. Catch share programs that privatize fisheries cause significant job losses and hurt fishing communities while transferring the wealth of a public resource to private entities. The rush to implement these systems by NMFS and the Fisheries Management Councils ignores these devastating economic effects, and overlooks the likely cumulative effects of more of these systems further marginalizing the small fishermen of the United States. In addition, the ecological benefits touted by catch shares proponents are overstated and subject to debate in academic literature.

If the NEFMC continues with this scoping process, they must thoroughly study the likely economic effects on all participants in the fishery, not just those who are likely to remain in the fishery after consolidation. NEFMC should consider cumulative impacts of this program, existing catch shares programs, and possible future catch share programs in the region. Any referendum held on implementing catch shares in the monkfish fishery must include all fishery participants, not just those who dominate the fishery and are most likely to benefit from a catch shares program.

In addition, the Council should review in the proposed Environmental Impact Statement the full record of academic literature detailing the questionable ecological benefits for catch shares. As highlighted by the National Resource Council, catch shares are a management tool, not a conservation method. Catch shares do not always improve the health of a fishery; they inherently incentivize high-grading and bycatch, and move a fishery towards larger vessels that may use more destructive gear. The NEFMC must present support for its case that catch shares, not the associated TAC, are responsible for any stock improvements.

FWW urges the NEFMC to consider alternative methods for managing the monkfish fishery. We agree that we need responsible fisheries management policies to sustainably utilize the fish in our oceans, but we believe it can be done in a way that enhances, not destroys, the lives of fishermen and their communities.

FWW calls this approach "Fair Fish." As fish are a public resource, the federal government has a duty to preserve this resource in the public trust. But the assumption that this can only be achieved through privatization is false. Following upon the "common pool resources" research by Nobel-prize winning economist Elinor Ostrom, a recent analysis of fisheries have shown that there are many paths to effective co-management of fisheries resources between the public and the government.<sup>68</sup> Quota systems can be a part of the answer without relinquishing control of the resource.



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The foundation of a scientifically determined cap (the TAC) on fishing has been key the preservation and restoration of many fish stocks internationally. From this, percentage quotas can be distributed in ways that are not windfall give-aways, do not exclude smaller scale fishermen, and do not block new entrants to a fishery.

One way to distribute shares is renting or auctioning out quota. For economic and ethical reasons, many researchers agree that quota programs should be funded by fees, and rent paid by those granted access to the public's fish.<sup>69</sup> This system gives the government the greatest flexibility in distributing shares, as they can set tiers of eligibility (such as vessel size), social and environmental priorities (with quota distribution favored to communities or vessels with lower carbon emissions or gear associated with less bycatch or habitat impacts), and can set term limits on the permits so that the system can evolve along with the fishery.

These up-front fees are then reinvested directly into the fishery to fund stock assessments, management, and enforcement, and can also be used to fund community development and national priorities like greening our fishing fleet.

By ensuring that fishermen get their fair share, the U.S. can ensure that the fish in our markets were caught by healthy communities using the best available practices. This ensures a better life for our nation's fishermen and fishing communities, and a better product for our nation's consumers.

We appreciate the opportunity to comment on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meredith McCarthy', with a long, sweeping horizontal line extending to the right.

Meredith McCarthy  
Researcher, Fish Program





<sup>1</sup> Copes, Parzival and Charles, Anthony. "Socioeconomics of individual transferable quotas and community-based fishery management." *Agricultural and Resource Economics Review*. 33/2. October 2004 at 174-175.

<sup>2</sup> National Research Council. Committee to Review Individual Fishing Quotas. "Sharing the fish: Toward a national policy on individual fishing quotas." National Academy Press. Washington, DC. 1999 at 142.

<sup>3</sup> Arnason, Ragnar. "Iceland's ITQ system creates new wealth." *The Electronic Journal of Sustainable Development*. Vol 1 Issue 2. 2008 at 36.

<sup>4</sup> Macinko, Seth and Bromley, Daniel W. "Who owns America's fisheries?" Center for Resource Economics. 2002 at 18. For an example, see Brandt, Sylvia. "A tale of two clams." *Regulation*. Spring 2005 at 20.

<sup>5</sup> Saving Seafood. "Catch shares cut New England fleet in half; New Bedford mayor to convene council meeting." Dec 9, 2010. <http://www.savingseafood.org/state-and-local/catch-shares-cut-new-england-fleet-in-half-new-bedford-mayor-to-convene-council-me-4.html>

<sup>6</sup> National Research Council. Committee to Review Individual Fishing Quotas. "Sharing the fish: Toward a national policy on individual fishing quotas." National Academy Press. Washington, DC. 1999 at 295.

<sup>7</sup> Pinkerton, Evelyn et.al. "The elephant in the room: The hidden costs of leasing individual transferable fishing quota." *Marine Policy*. 2009 at 4.

<sup>8</sup> Pinkerton, Evelyn et.al. "The elephant in the room: The hidden costs of leasing individual transferable fishing quota." *Marine Policy*. 2009 at 2.

<sup>9</sup> Copes, Parzival and Charles, Anthony. "Socioeconomics of individual transferable quotas and community-based fishery management." *Agricultural and Resource Economics Review*. 33/2. October 2004 at 175.

<sup>10</sup> United Nations, Human Rights Committee, International Covenant on Civil and Political Rights, (91<sup>st</sup> session) *Communication No. 1306/2004. CCPR/C/91/D/1306/2004*. December 2007, #11 at 20. Available at [http://www.bayefsky.com/pdf/iceland\\_t5\\_iccpr\\_1306\\_2004.pdf](http://www.bayefsky.com/pdf/iceland_t5_iccpr_1306_2004.pdf)

<sup>11</sup> Alaska Journal of Commerce. "High Pressure Tactics Were in Place at Dutch Harbor." Web posted June 5, 2009. Available at [http://www.alaskajournal.com/stories/060509/fis\\_img37\\_001.shtml](http://www.alaskajournal.com/stories/060509/fis_img37_001.shtml)

<sup>12</sup> Rothschild, Brian. Testimony on Catch Shares to the Subcommittee on Insular Affairs, Oceans and Wildlife, Committee on Natural Resources, U.S. House of Representatives. April 22, 2010. <http://www.savingseafood.org/washington/dr.-brian-rothschild-testimony-on-catch-shares-4.html>

<sup>13</sup> Saving Seafood. "Catch shares cut New England fleet in half; New Bedford mayor to convene council meeting." Dec 9, 2010. <http://www.savingseafood.org/state-and-local/catch-shares-cut-new-england-fleet-in-half-new-bedford-mayor-to-convene-council-me-4.html>

<sup>14</sup> All from NOAA Fisheries Office of Sustainable Fisheries. Current Catch Share Program Spotlights. Available at [http://www.nmfs.noaa.gov/sfa/domes\\_fish/catchshare/index.htm](http://www.nmfs.noaa.gov/sfa/domes_fish/catchshare/index.htm)



except for Surf clam, from NOAA's Status of Fishery Resources off the Northeastern US: Atlantic Surfclam. <http://www.nefsc.noaa.gov/sos/spsyn/iv/surfclam/> and Ocean Quahog, from NOAA's Status of Fishery Resources off the Northeastern US: Ocean Quahog, <http://www.nefsc.noaa.gov/sos/spsyn/iv/quahog/>

<sup>15</sup> This number varies between fisheries. For the New England groundfish fishery, each boat is estimated to have 3 to 5 jobs available, while for the Alaska King crab and snow crab fishery, an average of 5 to 6 jobs are available. Saving Seafood. "Catch shares cut New England fleet in half; New Bedford mayor to convene council meeting." Dec 9, 2010.

<http://www.savingseafood.org/state-and-local/catch-shares-cut-new-england-fleet-in-half-new-bedford-mayor-to-convene-council-me-4.html> Also, see Knapp, Gunnar.

"Economic Impacts of BSAI Crab Rationalization on Kodiak Fishing Employment and Earnings and Kodiak Businesses. A Preliminary Analysis" Institute of Social and Economic Research, University of Alaska Anchorage. May 2006 at 21.

<sup>16</sup> Calculation performed by Food & Water Watch staff. NOAA reports a 70% reduction, which does not match the numbers provided.

<sup>17</sup> Calculation performed by Food & Water Watch staff.

<sup>18</sup> Calculation performed by Food & Water Watch staff.

<sup>19</sup> Calculation performed by Food & Water Watch staff.

<sup>20</sup> Calculation performed by Food & Water Watch staff. NOAA reports a 74% reduction, which does not match the numbers provided.

<sup>21</sup> Calculation performed by Food & Water Watch staff. NOAA reports a 40% reduction, which does not match the numbers provided.

<sup>22</sup> Gaines, Richard. "NOAA chief: System not causing job loss." *The Gloucester Times*. Dec 16, 2010. <http://www.gloucestertimes.com/local/x1707767675/NOAA-chief-System-not-causing-job-loss>

<sup>23</sup> For an example of such claims, see: Environmental Defense Fund. "What do catch shares mean for fishing jobs and fishing fleets?" Accessed on Feb 4, 2011; page last updated October 28, 2009; available at <http://www.edf.org/page.cfm?tagid=48874>

<sup>24</sup> Pinkerton, Evelyn, et al. "The elephant in the room: The hidden costs of leasing individual transferable fishing quota." *Marine Policy*. 2009 at 5.

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<sup>28</sup> Calculations performed by Food & Water Watch staff. "Rationalization resulted in an estimated loss of 757 total jobs in the BRR fishery.... And an estimated loss of 457 total jobs in the BSS fishery." From Knapp, Gunnar. "Economic Impacts of BSAI Crab Rationalization on Kodiak Fishing Employment and Earnings and Kodiak Businesses. A Preliminary Analysis" Institute of Social and Economic Research, University of Alaska Anchorage. May 2006 at 22.

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online at [http://www.nero.noaa.gov/sfd/MSA\\_amended\\_20070112\\_FINAL.pdf](http://www.nero.noaa.gov/sfd/MSA_amended_20070112_FINAL.pdf)

<sup>30</sup> Magnuson-Stevens Fishery Conservation and Management Act, as amended through Jan 12, 2007, § 303A(c)(5). May 2007, second printing. Available online at [http://www.nero.noaa.gov/sfd/MSA\\_amended\\_20070112\\_FINAL.pdf](http://www.nero.noaa.gov/sfd/MSA_amended_20070112_FINAL.pdf)

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<sup>32</sup> McCay et al. "Individual transferable quotas (ITQs) in Canadian and US fisheries." *Ocean & Coastal Management*. Vol 28, No 1-3. Pp 85-115. 1995 at 104.

<sup>33</sup> McCay et al. "Individual transferable quotas (ITQs) in Canadian and US fisheries." *Ocean & Coastal Management*. Vol 28, No 1-3. Pp 85-115. 1995 at 105.

<sup>34</sup> Dory Associates. "Access Restrictions in Alaska's Commercial Fisheries: Trends and Considerations." Prepared for the Alaska Marine Conservation Council and Gulf of Alaska Coastal Communities Coalition. January 2009 at page 21. Available online at <http://www.akmarine.org/pressroom/access-restrictions-in-alaska2019s-commercial-fisheries-trends-and-considerations>

<sup>35</sup> Dory Associates. "Access Restrictions in Alaska's Commercial Fisheries: Trends and Considerations." Prepared for the Alaska Marine Conservation Council and Gulf of Alaska Coastal Communities Coalition. January 2009 at page 21. Available online at <http://www.akmarine.org/pressroom/access-restrictions-in-alaska2019s-commercial-fisheries-trends-and-considerations>

<sup>36</sup> Ecotrust Canada. "Briefing: A cautionary tale about ITQs in BC fisheries." Issue 8. 209 at 3. Available online at <http://www.ecotrust.ca/fisheries/cautionarytale>

<sup>37</sup> For an example of such claims, see: Environmental Defense Fund. "What do catch shares mean for fishing jobs and fishing fleets?" Accessed on Feb 4, 2011.; page last updated October 28, 2009; available at <http://www.edf.org/page.cfm?tagid=48874>

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- <sup>56</sup> National Marine Fisheries Service. "2009 Gulf of Mexico Red Snapper Individual Fishing Quota Annual Report." Available online at <https://ifq.sero.nmfs.noaa.gov/> in "Additional Documents." 2009 at 15. Calculations performed by Food & Water Watch staff of 3 rows: "Number of red snapper discarded alive"; "Number of red snapper discarded dead"; "Number of red snapper with unknown disposition."
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Riverhead NY  
1/31/11

To Whom It May Concern:

I would like to start off by saying I am not for or against ~~seas~~ or ITQ's. There are a lot of questions that need to be answered first. Here are some of my concerns. First one is, right now only half of permits are active. That means everyone who is fishing at 90 or 100% of it's potential is going to get less fish than they are now to accommodate the permits that are not actively fishing. Unused permits need to be addressed.

If you look at page 15 for fishing year 2009, I took a rough tally of how many pounds of monk I caught and both of my vessels are in the top 1/8<sup>th</sup> of boats catching between 65,000 and 235,000 lbs. of monk. But if you look at page 18 and find Hampton Bays and look at the dollar value, I know I caught almost that much myself. That to me says the data is wrong. And if mine isn't right it is a safe bet that most others are wrong too. There are at least five other directed boats that fish there part of the time also, not counting all non directed fishing trips for the whole port.

History from the north has to stay in the north and history from the south has to stay in the south. Qualifying years should be current like from 2003 -2008. Current years show economic dependency. For example: potentially a boat in the north could land more fish in one trip than I could for the whole year by fishing exclusively in the south. By dividing history up into each area it levels the playing field for everyone.

Who is going to pay for dockside monitors and mandatory observer coverage? I can't. At a time when operating costs are going up for equipment there is less room for profit. It seems like it is more about giving someone else a job while you are on the verge of losing yours.

I would like to see what we are going to get before we decide what we are going to do. I don't want to be forced into something because in your mind you think it is going to be better, then to find out later that it is worse. I can't afford to have things get worse. I know what we have now and how it works.

Sincerely,

Tim Froelich  
F/V's Miss Independence & Liberty

*Timote Froelich*



As owners of older, larger offshore vessels that had heavy participation in ground fish, we ended up with almost no allocation. When management asked us to fish for other species so ground fish could rebuild, we created markets for Squid, Scup, Butterfish and Monk tail, only to have ground fish eligibility taken away. As we move to "catch shares" in monkfish, we are afraid that the same thing might happen for many reasons, including small daily trip limits and not being close enough to the fishing grounds. We feel that any effort that came in after 2000, is lateen effort and should not be given all monkfish allocations because:

1. Smaller boats live on small daily trip limits.
2. Deploying your fishing gear and being able to return to the dock and not be counted as a day at sea.
3. Being geographically located close to the fishing grounds. I.e.: Cape Cod, Northern New Jersey or Block Island.
4. NMFS considers "gillnets" more environmentally friendly. (I will include some photos of what's left behind after a gillnet season)
5. Not having the council chairman lobbying to use your most recent, best years. Or giving a group an allocation that they never landed.

We strongly feel that the NMFS should use VTR data from 1994m the year it was made mandatory, and any other earlier year with settlements that were used to pay taxes. If they were good enough for the IRS, they should be good enough for NMFS.

We feel larger vessels have been discriminated against do to small trip limits and using qualifying years after fishing restricting was implemented. We assure you that if a monkfish catch share plan is implemented like ground fish, litigation will follow.

Thank You,

F/V Titan  
F/V Yankee Pride  
F/V Lightning Bay  
F/V Shelby Ann

F/V Travis & Natalie  
F/V Vic-Ter-Ray  
F/V Karen Elizabeth



















**From:** jean public <jeanpublic@yahoo.com>  
**To:** monkfisha6@noaa.gov, americanvoices@mail.house.gov,  
info@oceana.org, INFO@OPSOCIETY.ORG, info@seashepherd.org,  
info@wdc.greenpeace.org, info@peta.org, info@emagazine.com,  
comments@whitehouse.gov  
**Subject:** public comment on federal register CUT ALL QUOTAS BY 50%  
**Date:** 12/02/2010 4:53:19 PM

noaa is not using effective, efficient government actions in administering the fish in the sea, like these monkfish. it is time that we get a more careful, effective administrator overseeing the public's interest in these fish. right now, we have an agency catering to profiteering fishmongers, and we know when a quota is established those profiteers take ten times as many fish as they are allowed to in quotas given to them. it also seems that there are meetings in luxury hotels far too often, with the general taxpayers on the hook for hotels, meals, travel, bar bills????? if the fish profiteers had to pay for these meetings, you can be sure they would be less frequent. i ask the inspector general to look into these far too frequent meetings which seem designed for members to have luxury hotel vacations more than effective administration for the whole public's good.

in fact the entire american public is being robbed blind by these fish profiteers. the profiteers have caused species after species to be extinct. allowing optimum yields will cause extinction of this species. these comments are for the public record. i oppose all that noaa is doing. nothing they do helps the fish. it is all about making fish profiteers rich with million dollar catches on one trip. allowing this means whales, dolphins, sharks are dying from having nothing left to eat in the sea. that is horrific. death by starvation for all other living cratures because these degenerate fish profiteers take it all.

jean public 15 elm st florham park nj07932

[Federal Register: November 30, 2010 (Volume 75, Number 229)]  
[Notices]  
[Page 74005-74006]  
From the Federal Register Online via GPO Access [wais.access.gpo.gov]  
[DOCID:fr30no10-49]

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DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

RIN 0648-BA50

Fisheries of the Northeastern United States; Monkfish Fishery;  
Scoping Process

AGENCY: National Marine Fisheries Service (NMFS), National Oceanic and



Atmospheric Administration (NOAA), Commerce.

ACTION: Notice; intent to prepare an environmental impact statement (EIS) and scoping meetings; request for comments.

---

SUMMARY: The New England Fishery Management Council (NEFMC) announces its intent to prepare an amendment (Amendment 6) to the Fishery Management Plan (FMP) for monkfish (*Lophius americanus*) and an EIS to analyze the impacts of any proposed management measures. The purpose of Amendment 6 is to consider one or more catch share management approaches for the monkfish fishery, including, but not limited, to Individual Fishery Quotas (IFQs), sectors, and/or community quotas. The NEFMC is initiating a public process to determine the scope of issues and range of alternatives to be addressed in Amendment 6 and its EIS. The purpose of this notification is to alert the interested public of the commencement of the scoping process and to provide for public participation in compliance with environmental documentation requirements.

DATES: Written and electronic scoping comments must be received on or before 5 p.m., local time, February 15, 2011.

ADDRESSES: Written comments on Amendment 6 may be sent by any of the following methods:

E-mail to the following address: monkfisha6@noaa.gov;

Mail to Patricia A. Kurkul, Regional Administrator, NMFS, Northeast Regional Office, 55 Great Republic Drive, Gloucester, MA 01930. Mark the outside of the envelope "Scoping Comments on Monkfish Amendment 6;" or

Fax to Patricia A. Kurkul, 978-281-9135.

Requests for copies of the scoping document and other information should be directed to Paul J. Howard, Executive Director, New England Fishery Management Council, 50 Water Street, Mill 2, Newburyport, MA 01950, telephone 978-465-0492. The scoping document is accessible electronically via the Internet at <http://www.nefmc.org>.

FOR FURTHER INFORMATION CONTACT: Paul J. Howard, Executive Director, New England Fishery Management Council, 978-465-0492.

#### SUPPLEMENTARY INFORMATION:

##### Background

The U.S. monkfish fishery is jointly managed by the New England and Mid-Atlantic Councils, with the NEFMC having the administrative lead. The Councils manage monkfish under a two-area program (northern and southern), primarily due to differences in the characteristics of the fisheries in the two areas, although no conclusive evidence exists supporting the idea that there are two biological stocks. The Monkfish FMP became effective on November 8, 1999. The Councils have modified the

[[Page 74006]]

management program several times since the original FMP was adopted, most recently in 2010 with the completion of Amendment 5, containing Annual Catch Limits, Annual Catch Targets (ACT) and specification of days-at-sea (DAS) allocations and trip limits for the 2011-2013 fishing

years.

While a significant portion of the monkfish catch in both areas is incidental to other fishing activities, a directed fishery also exists. The Councils have adopted incidental catch possession limits for all non-directed fisheries, and currently manages the directed fishery through a combination of DAS allocations and trip limits designed to achieve the ACT.

#### Measures Under Consideration

The Councils are considering catch shares for the monkfish fishery as a way to improve the economic performance of the fishery by increasing flexibility, maintaining catch within set limits, achieving optimum yield, promoting safety, and reducing the regulatory burden on vessel operators. Additionally, nearly 75-percent of limited access monkfish permit holders also hold a limited access permit in the Northeast multispecies fishery, where a catch share program (in the form of sector management) has been implemented. As a consequence, many monkfish permit holders have requested that the Councils consider a catch share program in the monkfish fishery to coordinate the management and improve the performance of both fisheries.

"Catch shares" is a generic term for a fishery management program that allocates a specific portion of a total fishery catch to individuals, communities, or cooperatives (including sectors). In contrast to managing through effort or input controls such as DAS and trip limits, catch shares management focuses on allocating and monitoring the catch or output controls. Specific catch share approaches include, but are not limited to, IFQs, Individual Transferrable Quotas (ITQs), Community Quotas, Harvest Cooperatives (including "sectors" such as those as recently adopted in the Northeast Multispecies FMP), area-based fishing rights, and non-vessel allocations (e.g., dealer or processor shares). At this stage in the amendment process, the Councils have not eliminated any of the various types of catch share management approaches from consideration. Rather, they intend to collect early comments from stakeholders and interested parties to guide them in the development of appropriate catch-share alternatives. The Councils are also interested in hearing from stakeholders what their concerns might be with various catch share elements, including, but not limited to, limits on accumulation of shares, costs of monitoring individual catch, barriers or incentives for new entrants, and the effect of consolidation on fishing communities.

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) authorizes and provides a regulatory framework for Councils to establish Limited Access Privilege Programs (LAPPs), of which ITQs are one type. In addition to the requirements and standards for all LAPPs, the MSA requires the NEFMC specifically to hold a referendum and gain approval of more than two-thirds of the voters for an IFQ program prior to submitting the plan to NMFS. The Councils will determine who is eligible to participate in the referendum from among the potential pool that includes permit holders and crew members who derive a significant part of their total income from the fishery. If an IFQ system is adopted, the Council would allocate individual proportions of the available catch to qualified participants who may then be allowed, under yet-unspecified terms and restrictions, to buy, sell, trade or otherwise transfer their shares to other entities or participants.

#### Scoping Process

All persons affected by or otherwise interested in monkfish fishery

management are invited to participate in determining the scope and significance of issues to be analyzed by submitting written comments (see ADDRESSES) or by attending one of the meetings where scoping comments will be taken. Scoping consists of identifying the range of actions, alternatives (including taking no action), and impacts to be considered in developing an amendment that addresses the purposes and goals discussed in this notice. Impacts may be direct, indirect, or cumulative. This scoping process will also identify and eliminate from detailed analysis issues that are not significant, as well as alternatives that do not achieve the goals of the FMP or this amendment.

The scoping process for Amendment 5 to the Monkfish FMP (74 FR 7880; February 20, 2009) also considered the development of a catch share program for the monkfish fishery in the range of issues to be considered in that amendment. However, by September 2009, the Councils recognized that, due to their complexity, development of catch share alternatives would likely delay Amendment 5, and risk not meeting the statutory deadline for annual catch limits and accountability measures under the MSA. At that time, the Councils agreed to separate the catch shares portion of the amendment to focus on the remaining elements, and consider catch shares in the next management action. Any comments concerning the development of a catch share program for the monkfish fishery that were received in conjunction with the scoping process for Amendment 5 will be carried forward in the development of Amendment 6.

After the scoping process is completed, the NEFMC will identify the range of alternatives to be considered in the Amendment 6, and to be analyzed in the EIS. Once a draft amendment document, including a draft EIS, is completed, the NEFMC will hold public hearings to receive comments on the alternatives and the analysis of its impacts presented in the draft EIS. Following that public comment period, the NEFMC will identify its proposed action and complete a final amendment document that includes a final EIS, as well as documentation and analysis required by all other applicable laws. The NEFMC will then submit the amendment to NMFS for review, approval and implementation.

#### Scoping Hearing Schedule

At this time, only one scoping meeting is scheduled. The Councils will schedule additional meetings in the near future, and announce those meetings in the Federal Register, as well as on the Councils' Web site and through other channels. The first scheduled meeting is to be held in conjunction with the Mid-Atlantic Fishery Management Council meeting:

1. Wednesday, December 15, 2010, 4:30 p.m.; Hilton Beach Oceanfront, 3001 Atlantic Avenue, Virginia Beach, VA 23451, telephone: (757) 213-3000.

#### Special Accommodations

The meetings are accessible to people with physical disabilities. Requests for sign language interpretation or other auxiliary aids should be directed to Paul J. Howard (see ADDRESSES) at least 5 days prior to this meeting date.

Authority: 16 U.S.C. 1801 et seq.

Dated: November 24, 2010.  
Emily H. Menashes,  
Acting Director, Office of Sustainable Fisheries, National Marine  
Fisheries Service,



**From:** Pam Pine <ppbl@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** monkfish ifq  
**Date:** 02/08/2011 9:21:02 AM

You absolutely cannot expect fishermen to support catch shares without knowing what they may entail. Any consideration for IFQS would have to include the following elements , the north-south line remains, no bringing quota back&forth, no monopolizing, (a cap on quota held by an individual or business entity), re-qualification of permits, eliminate latent effort and base catch shares on recent years with reasonable trip limits. Also a cap on the amount of gear allowed , no more net than we are currently allowed. Perhaps a different approach would be better for now, I believe we could make the fishery more efficient, increase ex-vessel price and reduce any possible environmental impact with a couple of small changes that would not involve changing the entire FMP. The most significant thing would be to consider some sort of fish for time program. This would allow a vessel to bring the fish to the dock and be charged DAS accordingly . Example, a vessel could bring 7,500# to the dock and be charged 2 1/2 days or something of that nature. Structuring the fishery along those lines would definitely result in less environmental impact (get the gear in and out of the water ASAP), a better, fresher product on the market and most importantly a safer fishery. The current regs have vessels sitting out in the ocean during adverse weather conditions or trying to fish in unsafe conditions because we are handcuffed by the way the laws are written. I believe that we need to consider some of these options before we give any consideration to any kind of IFQ program. Too many small business entities could be forced out of the fishery, paving the way for big business take-over and that is about 180 degrees from what we are trying to achieve. Mike Johnson, F/V Sea Farmer-Barnegat Light, NJ

**From:** PKavanagh5@aol.com  
**To:** monkfisha6@noaa.gov  
**Subject:** SCOPING COMMENTS ON MONKFISH AMENDMENT 6  
**Date:** 02/10/2011 12:26:00 PM

Gen Q's

- 1) No Good. Big mess coupled w/ but managed separately on same trip.  
(Groundfish/Monk trips)
  - a) Rubik's Cube of In-put controls are hopeless mess. i.e.; Current Trip limits being the same for a 30' boat and a 130' boat are outrageously unfair, and absurd.
  - b) Basing ITQ history on longer time period including years without trip limits would give a fairer break.  
Eliminate myriad of rules and mesh it with multi species under an ITQ makes sense. NOT SECTORS!!
- 2) If you support moving to...
  - a) Be able to land/ sell all monks that are caught while ground fishing
  - b) benefit; stable system, Relief from prohibitive rules  
cost; initial shock as reality of allocation sets in
  - c) ITQ/IFQ . NOT SECTORS!!! Sectors open the door to corruption. Also, the pilot program- CCHookSector, has failed.
- 3) N. A.

Catch share specific Q's

- 4) NMFS and ENVIROS should pay, supplemented by 3% of lease transactions (Forget Sectors. The pilot Hook Sector will have landed no fish this year as they have gone defunct.)
- 5) vessel owners should only be eligible. Don't open Pandora's box.
- 6) 1990-2006 Straight history per permit. Period. Permanent.
- 7) Not. No social engineering
- 8) Same limits as scallop rules
- 9) NO.No social engineering. They can buy in
- 10) Maybe by showing Tax return\$ with proof of 20% of Monkfish\$ over Qualifying years of plan
- 11) Why would you consider "Sectors" The hookers sector fell flat.  
Please let us continue to be individuals?

Thank You. Pat Kavanagh Owner FV"S Moragh K, Mary K, Atlantic. 100' steel trawlers based in New Bedford

**A New England Dilemma:**  
**Thinking Sectors Through**

Final Report

to

Massachusetts Division of Marine Fisheries

by

Seth Macinko

and

William Whitmore

Department of Marine Affairs  
University of Rhode Island

Revised June 2009



## Preface

This report was commissioned by the Massachusetts Division of Marine Fisheries (DMF) but the assessments expressed herein are solely those of the authors. DMF sought an “outside” consideration of the current policy process playing out in the New England Fishery Management Council arena regarding the multispecies groundfish fishery and the movement towards a management tool known as sectors. The authors thank the many people who contributed their thoughts on sectors. Without exception, the comments received were candid, thoughtful, and passionate. Management of New England groundfish fisheries appears to be in crisis and at a crossroads. The established management approach appears to be thoroughly broken, and it is hoped that this report can contribute to further discussions about the future of groundfish management in New England.

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## Executive Summary

- The current push for sectors obscures the fundamental policy decision at stake: whether to pursue catch shares via a model that emphasizes “privatization” of public resources or a model consistent with public ownership of fishery resources. The privatization model carries with it known inequities while the public ownership model could offer equity for all interests involved. Sectors can occur via either route but there has been no public recognition or discussion of this choice.
- Sectors hold great promise to improve the conservation of key stocks because they are predicated upon total allowable catch limits (TACs). However, the conservation benefits of sectors are not guaranteed; instead, they rest on the ability to set, monitor, and enforce sustainable TACs. This is going to be a challenging task in the context of a multispecies trawl fishery, but it is not insurmountable.
- The current approach to sectors appears to be driven by an extreme faith in privatization, deregulation, and devolution of authority. Mere faith that private ownership promotes stewardship *will not* contribute towards solving the monitoring and enforcement challenges on which conservation truly depends, and could spell disaster for sectors.
- Many fishers believe that sectors and the adoption of a quota system will create a market that will address all the problems associated with bycatch. But trawling, the dominant fishing method for New England groundfish, will still result in significant bycatch, and when a TAC is reached, under current law, the fishery will close. We are doubtful that sectors will “solve” the bycatch problem.
- In general, we found a sharp difference in support for sectors between a managerial class within industry (those that represent industry associations and/or sectors) and rank and file fishers within the fleet. Our interviews suggested that many in industry lack detailed knowledge about how sectors will work in practice, and thus greater and more impartial outreach is called for. While current permit holders and some captains are familiar with the idea of sectors, many fishers, particularly crew, are unaware of the potential changes and impacts associated with the switch to sectors.
- Our interviews found that there is a belief among some members of industry that sectors will render in-season closures unnecessary. If this belief is widespread, there could be substantial unrest when TACs are attained and closures are triggered.
- Sectors are likely to accelerate the consolidation that is already happening in the groundfish fleet. In addition to affecting sheer vessel numbers, consolidation will likely have a geographic component, shrinking the number of ports actively involved in the fishery.
- Though many individuals involved in the creation of the sector program voice concern for communities, there is nothing in the current approach to sectors that specifically addresses community impacts. Sectors and the planned “community banks” are fully

mobile corporations that have no explicit or permanent tie to municipalities. If communities are important to policy makers, they should be addressed specifically. For example, the Council should consider mandating that details of community banks be explicit and assure that these details favor communities (e.g., distribute benefits to communities).

- In view of the Council's expressed concern for adverse impacts on communities, as well as the statutory mandate to attempt to reduce such impacts (National Standard 8), the relationship between sectors and community benefits warrants closer consideration. Community benefits cannot be just assumed to happen via a trickle-down process.
- Sectors are private clubs. One potential benefit of this characteristic is that the club becomes a "vehicle" for exerting peer pressure on all members of the club. In this way, sectors may present opportunities for collective action that are not present under a catch share system featuring only individual allocations. This peer pressure may be applied for good or bad purposes. One obvious potential concern is the possibility for domination by a local elite. There is no certainty that sectors will be run on a democratic basis.
- Although limiting impacts to the dayboat/smallboat fleet is an expressed goal of the Council, besides allowing them the option to create their own sector, we see little being done to protect these fishers.
- In our interview sample, we encountered widespread belief that sectors are simply an interim stage in the movement towards ITQs (individual transferable quotas). If this belief turns out to be true, it is highly likely that much, if not most, of the critical characteristics of a future ITQ program are being preconfigured *without* informed public debate.
- There is a disconnect between managers' and fishers' expectations of monitoring requirements. In order for sectors to be successful, an accurate recording of catch and enforcement of the TAC is absolutely essential. We anticipate monitoring expenses will be significant.
- In many ways, we see little difference between sectors and an ITQ system in terms of conservation and other benefits. There are however, similarities in their disadvantages. The proposed rules and regulations for sectors allow trading of quota both within and between sectors and there is no established limit on quota holdings, so that consolidation effects under sectors may be similar to, or even more pronounced than those associated with an ITQ program. Sectors as planned, however, have an additional disadvantage: sectors will have markets that are less transparent and relatively inefficient and inflexible featuring fixed links between groundfish permits, vessels, and potential sector contributions. Market-based programs function best with open, transparent, and active markets.

- There is a leadership role for DMF to play in the sector process. The constituency of the Commonwealth is different than the constituency of the Council and DMF is the logical party to represent these broader interests. DMF can enhance the focus on meaningful conservation benefits. DMF can play an important role in the much needed outreach effort. DMF can also work to insure that communities (as municipalities) directly benefit rather than relying on endowments to individuals in the industry to provide benefits that trickle down to the community as a whole. Finally, there is an urgent need for DMF to contribute to the restructuring and improvement of the relationships between the groundfish industry, the Council, and the National Marine Fisheries Service.



## I. Introduction

### a) Context and Methods

As described in the Preface, this report was commissioned by the Massachusetts Division of Marine Fisheries (DMF) as an “outside” perspective on a pressing fishery management issue of relevance to the Commonwealth. Specifically, this is *not* a DMF report, but rather *our* report to DMF. We set out to learn more about the nature and extent of support for a management tool known as sectors. We wanted to think about sectors in the larger context of groundfish management in New England and indeed within the context of contemporary fishery management (particularly, but not exclusively, within the U.S.) in terms of the possible advantages and disadvantages offered by sectors. Ultimately, we were curious if the aspirations for sectors are likely to be realized given their current design.

To accomplish these goals, we employed the technique of ethnographic interviews primarily focused on the fishing industry—divided into those who would be managing/running sectors *and* those that would be fishing as a member of a sector. We emphasize that we specifically did not focus on members of the New England Fishery Management Council (the Council), choosing instead to let official Council documents and recordings of Council meetings provide us with documentation of Council members’ interests. We also did not consult with known proponents of sectors (unless they fell into the industry category already discussed) because our interest was in how the actual participants in sector management think about sectors. We also surveyed others (non-industry) providing direct support to the formation and running of sectors.

We held formal conversations with thirty people—most were from the commercial fishing industry but, as noted, we did speak with members of non-governmental organizations (NGOs) directly engaged with sectors. In particular, we spoke to representatives from seven different sectors as well as members of industry umbrella groups representing multiple sectors, thus covering the majority of the existing and proposed sectors. In addition to these formal conversations, we had impromptu conversations with others while at meetings and on the docks. We augmented our review of Council tapes and documents by speaking with key state and federal fishery managers. Finally, we consulted the literature on fishery management, particularly that associated with the use of “catch shares.”

### b) “Sectors” and Fishery Management in New England

The title of a recent article in *National Fisherman* succinctly sums up the state of play in fishery management in New England: “New Englanders pin hopes on fishing sectors [Smith 2008].” Going by such popular accounts or by the sense that is “in the air,” it seems that everyone is counting on “sectors” to save them. But *what* they are being saved from varies. For example, in the recent history of the New England Fishery Management Council (Council) some supporters see sectors as the only way out of continued purgatory under the current days-at-sea (DAS) input control regime; some see sectors as a way to head off strict catch limits and catch-accounting as required by the revised Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) which governs fishing in federal waters in the U.S.; some see

sectors as an alternative to individual transferable quotas (ITQs); some see sectors as a way to simplify management and devolve authority to industry; some see sectors as a means to promote stewardship; and some seemingly see sectors as a goal unto themselves. These perceived benefits of sectors are not mutually exclusive.

Yet these perceptions alone do not explain the avid embrace of sectors. The environment of despair and anxiety under which advocacy for sectors has taken place has played an important role. As the New England Fishery Management Council (the Council) notes in its Draft Environmental Impact Statement for Amendment 16<sup>1</sup> (Amendment 16 is the management package that includes an expansion of the currently limited use of sectors for groundfish management):

Several groundfish stocks are either overfished, have been declared overfished in the past, or are experiencing overfishing and are currently rebuilding under programs that do not meet the requirements of the M[agnuson]-S[tevens] Act. While many stocks will continue to increase under current fishing mortality rates—indeed some will increase to levels not observed in the last thirty years—most stocks will not achieve levels that will support maximum sustainable yields [A16DEIS 2008:18].

Thirty years of managing groundfish stocks off New England under the system of regional management created by the Magnuson-Stevens Act has, in many popular accounts, failed for both the fish and the commercial fishing industry (see, e.g., NRC 1999a). Things are bad and a recent fishery stock assessment presented even bleaker news (Rago 2008). Thus, the embrace of sectors is occurring in a context that is ripe for salvation-seeking.

At the same time that hopes are pinned on sectors, many individuals are reported to “have serious and valid concerns about sector management and the challenges of implementation [Smith 2008:8].” These hopes and concerns have special relevance for the Commonwealth of Massachusetts. The Commonwealth has a considerable stake in the outcome(s) produced by a shift to management featuring sectors, and not only because of the overfished status of many groundfish stocks. Whether sectors succeed or fail in delivering any or all of the anticipated benefits, the outcome will disproportionately fall on residents of the Commonwealth. Of the 1,271 federal groundfish permits, 646 are associated with vessels home-ported in the Commonwealth; of these permits 574 (total)/300 (Massachusetts) were “active” permits.

The background sketch offered above captures the context we were presented with as we began our inquiry into sectors for the groundfish fishery. Given the combination of despair, hope, residual concerns, and high stakes, it is important for all parties to take a closer look at sectors and to scrutinize the process associated with their construction and implementation.

We believe there is much to consider and to understand in order to thoroughly “think through” the policy options regarding sectors. We have endeavored to be complete in our

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<sup>1</sup> Note that all references to the Draft Environmental Impact Statement for Amendment 16 [A16DEIS 2008] are to the June 1, 2008 version—the version that was current at the time the bulk of the work on this report was in process.

presentation but the pace of what is clearly turning out to be a media campaign promoting sectors is accelerating and we will invariably not be able to address all of the claims made as part of that campaign.

We begin, in Section II, by presenting a working definition of sectors and consider key features of sectors as being contemplated under Amendment 16. In addition, we present a brief survey of the theory behind sectors (derived from a larger body of work on “catch share” programs). We think it is important for all those involved in the consideration of sectors to possess a basic familiarity with the lineage (and future direction) of the ideas and concepts involved. Recent advocacy for catch shares is clearly derived from an older literature on property rights and “rights-based fishing” and we characterize recent events as a crescendo in this movement. We note how events in New England are consistent with these larger trends and how many of the same players shaping the discussion at the national level are involved in the regional consideration of sectors.

In Section III, we discuss the result of the interviews we conducted (described above). It was immediately obvious that what we were being told was different than the popular perception of support for sectors and so we walk through a variety of factors that we think are critical in influencing the patterns of support and opposition we encountered. We then shift in Section IV to a policy analysis of the plan for sectors under Amendment 16, considering sectors from the standpoint of the declared goals and objectives for sectors.

In Section V we present a discussion of particular aspects of sectors having implications that run counter to popular perceptions. We also discuss areas where we think the policy process is ill served by some of the recent promotions of catch shares and sectors. We think it is important to reject the portrayal of the choice facing the Council (and the nation in the larger debate over fishery management in the U.S.) as one between catch shares and ruin. We argue that the real choice concerns *how* to structure catch shares. Finally, we close in Section VI and present two sets of recommendations. One set focuses on the existing approach to sectors. The second set of recommendations is focused on a completely different approach.



## **II. Sectors: Definitions, Features, and Supporting Theory**

The sector concept was introduced under Amendment 13 to the Northeast Multispecies Fisheries Management Plan (NEFMC 2003) and two sectors were subsequently formed under the guidance of the Cape Cod Commercial Hook Fishermen's Association (CCCHFA) based in Chatham, MA. To date, these are the only two sectors in existence and they have figured prominently in regional and national interest in the sector concept. While other forms of "catch share" programs exist (both nationally and internationally), none share the precise characteristics of sectors as they are understood in New England.

### **a) Definition of a Sector**

A sector is a group of fishers pursuing a shared specified total allowable catch (TAC). The relatively simple concept of fishing up to a TAC is actually a radical departure from past management practices by the Council. In the past, the Council has preferred what are known as "input" or "effort" controls, management measures that control industry inputs into the productive process of fishing. Restrictions on fishing gear, the number of days a boat may fish, and the number of fish a boat may catch per trip, are part of the bundle of input controls that the Council has applied to the groundfish fishery. In contrast, sectors bind participants to fixed limits on total catch, an example of what are called "output controls" because it is the output of fishing -- the catch -- that is directly regulated. While trip limits (used in New England in conjunction with effort controls) do constrain catches of some species for a given time period (e.g., daily or weekly landing limits), they do not limit the aggregate catch of a vessel or the fleet over the season. Sectors, in comparison, do feature a limit on the participating fleet's aggregate catch.<sup>2</sup> The formal definition of sectors is provided in the Council's policy statement on sectors:

*A sector means a group of persons holding limited access permits who have voluntarily entered into a contract and agree to certain fishing restrictions for a specified period of time, and which has been granted a TAC(s) [total allowable catch] in order to achieve objectives consistent with applicable FMP [fishery management plan] goals and objectives [NEFMC 2007:1].*

This definition is augmented by critical sentences found in Amendment 16 providing key details of how sectors are constructed:

*In the formation of a sector, sector participants can select who may participate. Only vessels with a limited access multispecies permit are eligible to join a sector. [A16DEIS 2008:41].*

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<sup>2</sup> We are aware that the Council has at times talked of an option for sectors that is based on days-at-sea rather than a total allowable catch (TAC) approach but in this report we focus exclusively on the TAC-based version of sectors. We do so because we think that is mostly likely to be the option pursued by the Council and because it is the option that is consistent with new mandates in the Magnuson-Stevens Act to utilize strict catch limits.

The share of the annual TAC for a stock that is allocated to a sector will be calculated based on the history attached to each permit that joins the sector in a given year [A16DEIS:43].

Note that catch history would be allocated to the sector as a whole and not necessarily to individual vessels within the sector. The self-selecting sector would then have to develop its own set of rules to distribute the sector's allocation among its membership [A16DEIS:45].

These sentences highlight critical features in the sector concept being contemplated by the Council. First, while a fisher may decide to join, actual admission to a sector is controlled by the sector, *not* the individual seeking to join. Merely holding a qualifying permit does not guarantee entry into a sector since the sector itself controls entry. It is not clear specifically who within the sector controls entry into a sector; acceptance could be determined by all sector members, strictly the initial founders, or some other subset of members.

The second sentence quoted above illuminates details of the market in access privileges that will be associated with sector management. This market will involve bundled combinations of vessels/permits/qualifying sector history.

The final sentences quoted above concern how the TAC for a sector is determined. A sector's dedicated TAC allocation is based on the catch histories brought into the sector by fishers who have been accepted as members by the sector. Notice that the individual catch histories do not translate into a fishable share of the TAC *unless* they are brought into/committed to a sector.

*b) "Potential Sector Contributions"---- Why Sectors are not LAPPs*

An interesting nuance is involved in the characterization of sectors presented above. Because allocations are not technically granted to individuals, sectors are not legally considered Limited Access Privilege Programs (LAPPs) under the Magnuson-Stevens Act, which defines LAPPs as catch shares assigned to individuals. With sectors, as opposed to LAPPs, an individual has a verified catch history,<sup>3</sup> not a catch share. While catch shares are granted to the individual and are usable upon issuance, sector allocations are based on verified individual catch histories of sector members. The critical feature here is that the actual *allocation* is to the sector, not to any individuals. Individuals simply pledge their catch history to the sector and the aggregate of these pledges becomes the allocation to the sector. A new term has been coined in the vocabulary of the Council process to reflect this distinction between the role of qualifying catch history in a LAPP versus in a sector; verified qualifying catch histories are known as "potential sector contributions."

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<sup>3</sup> The draft Amendment 16 refers to "catch history," "permit history," and "landings history" (see, for example p. 45) and although these terms sometimes have distinct meanings, we will use the term catch history to mean the qualifying catch history associated with a permit that becomes the "potential sector contribution."

#### c) The Common Pool

Since allocations are only to sectors, an individual who does not elect to join a sector or is not accepted by a sector cannot access their potential sector contribution. Such individuals remain in the “common pool” fishery. The common pool fishery targets the residual TAC that is not allocated to sectors. Note that in addition to the TAC-based option, the Council has considered a days-at-sea option for the common pool but we will not consider that option here because we do not think it will prove to be consistent with new mandates in the Magnuson-Stevens Act requiring catch limits. In any case, while the exact nature of how the common pool will be managed and what regulations will be applied is unclear, the common pool is the default option for those not in sectors.

Assuming that the common pool fishery is a TAC-based fishery, there is an opportunity cost to participating in the common pool fishery: effectively, an individual who is not in a sector (whether by choice or by rejection by the sectors) donates “his” catch history/potential sector contribution to the common pool where it is then available to all fishing in the common pool under whatever rules the Council elects to apply to the common pool. Of course, a fisher may do better in the common pool, catching more than his potential sector contribution, but most people we have talked to seem to fear the prospect of fishing in the common pool because of the possibility of a derby fishery developing as participants race for the common pool TAC.

#### d) The Permit Market Under Sectors

Regardless of whether a fisher joins a sector or opts for the common pool, all permits will be denoted with a potential sector contribution (and a fisher can fish in the common pool one year but attempt to join a sector in the following year). At present, it appears likely that all sector participants' catch histories will be based on a common and fixed set of years: “Unless changed by a future action, once a permit’s [potential sector contribution] is calculated in accordance with the selected [potential sector contribution] option, that [potential sector contribution] is permanent [A16DEIS:45].” This means that as time passes, the catch history used to determine the TACs of sectors will be based on an increasingly distant past. In this sense, there will be an “archaic” nature to sector management as time passes.

There is an interesting distinction here between sectors and other forms of catch share-based fisheries. Under sectors, there will be fixed assemblages of vessels/permits/potential sector contributions and the initial allocation freezes the fishery at the point of the qualifying years into these bundles. In contrast, other catch share programs use a qualifying period merely to *launch* the catch shares but then freely divisible allocations are traded, so the future does not necessarily resemble the past.

#### e) The Theory Behind Sectors

Sectors can be regarded as part of a global movement in fisheries management towards output controls, and more specifically toward catch share-based programs. Catch share programs feature two critical components. First, there is an overall limit on the amount of each managed target species that can be harvested by the fleet in aggregate, commonly known as the total allowable catch (TAC). Second, the TAC is then subdivided into allocations granted to



individual fishing operations. Hence, as the name implies, each vessel pursues its own “catch share.” Fishers in catch share systems enjoy greater operational flexibility than in fisheries managed through undivided TACs, since they are no longer in direct competition with each other to catch an unspecified portion of the TAC. Notice that in TAC-managed fisheries that do not contain a catch share component, it is this competition that often gives rise to a frenetic “race for fish” (the “derby”).

The simple explanation of catch shares offered above does not adequately convey a sense of the vast literature that has built up in support of such systems. To fully understand the force behind the trend towards catch shares, one has to understand this larger literature and, in particular, the emphases on private property rights and devolution of authority that dominate this literature and current catch share discussions. In the sections below, we present a synopsis of this literature and its emphases. We believe all parties interested in sectors should know the basics of this literature and aim here to just present an overview. We reserve critical comment until later in this report.

### *1) Private Property Rights and the Stewardship of Self-Interest*

A diagnosis of missing property rights is crucial to the entire field of fisheries economics and is central to the theoretical support for sectors: “From the start, it was recognized that fishery problems were related to the absence of individual property rights in the fish stocks. . . [Copes 1986:278].” While a voluminous literature has built up over a half-century regarding the importance of property rights and the need for “rights-based” fishing regimes (Gordon 1954; see, generally, Neher *et al.* 1989; Shotton 2000), the central content has not changed and is succinctly stated:

From an economic theory point of view, the major source of the overfishing problem is the lack of property rights [Anderson and Holliday 2007:9].

Note that the dominant causal model in the literature for over fifty years stresses the absence of property rights, not the absence of careful limitation of how many fish are caught, as the reason too many fish are caught (*c.f.*, Bromley 2009). Rather than framing the problem as a management problem—how to set appropriate catch limits and then enforce them—the prevailing literature instead frames the problem as a problem of ownership—since no one allegedly owns the fish, there is allegedly no incentive to conserve fish stocks. Ownership, it is argued, promotes stewardship. Stewardship, in turn, *would* bring management into play, because stewardship would presumably require adoption of sustainable catch limits.

The rationale for sectors, as a form of catch shares, thus rests on the circular reinforcement between beliefs about individual property rights and stewardship. It is a theory of self-interest—private owners will become stewards because of their long-term interest in protecting their property. While the National Research Council [NRC 1998:32] has noted that the entire theory (linking private ownership and stewardship) rests on “faith,” the argument is so ubiquitous that it now is taken as an established fact and presented to readers as something close to an immaculate chain of events:

[S]hares in a collapsed fishery are worth as little as shares in a collapsed bank. But shares in a thriving fishery command high prices and represent real wealth for their owners. Suddenly, fishermen have an incentive to preserve a fishery for the future, as preservation

will be reflected in a higher value of which they 'own' a share. Each fisherman has an incentive to lobby for the optimal TAC [Heal and Schlenker 2008:1045].

### 2) *Devolution, Deregulation, and Self-Regulation*

The second emphasis that pervades contemporary discussions of catch share programs focuses on catch shares as an alternative to what is perceived to be excessive or "heavy government involvement in fisheries management [Johnston and Sutinen 2009:11]."<sup>4</sup> It is no exaggeration to say that much of the rights-based/catch share literature features a marked anti-government tone. Perceiving a failure of government-based management that is regarded as top-down, this literature advocates putting fishermen in charge of management (Evans 2005; see also Fahn 2005). Notice that the emphasis here is on user *self-regulation* (Townsend *et al.* 2008), not *co-management* (understood as *shared* power and authority between users and government, see Pinkerton 1989).

### 3) *Theoretical Extremes and Recent Crescendo*

As mentioned above, the fisheries economics literature began with a focus on a property rights diagnosis. Still, the focus on property rights (and devolution) has become more pronounced over time. It can be argued that this evolution has created an extreme position. As a noted economist commented when he surveyed the literature in fisheries economics:

Actually, I would have to go much further in saying that I was shocked at learning the degree to which the regulatory agenda in this area had already been captured by some fisheries economists with an extreme "property rights" interpretation of harvesting quotas, which essentially preempts a serious consideration of [other standard economic tools] from the discussion table [Weitzman 2002:326 n.2].

The intense, and exclusive, focus on property rights as the causal force in what makes catch share programs "work" carries with it some implications that many people may indeed find extreme. For example, because holders of catch shares do not in fact "own" much that they could husband (were they so inclined), the leading theorists in fisheries economics have noted that if ownership promotes stewardship, it is important to own the correct thing(s). Thus we see statements such as the following from these theorists:

[Beyond] the property rights quality of the harvesting rights embodied in the quotas another important issue is the quality of *the property right in what really counts, i.e., the resource itself and its environment*. [Catch shares], being extraction rights, form only an indirect property right in these underlying resources. Consequently, they provide the individual quota-holders with little control over the fish stocks and the marine environment . . . [Árnason 2000:23-24, emphasis added].

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<sup>4</sup> Note that Johnston and Sutinen make this comment in the context of the current days-at-sea regime which is a cumbersome management scheme. We would only note that this regime arose through the Council process as a direct result of industry, and hence Council, rejection of strict catch limits (output controls) in the first place, it was not imposed from Washington, D.C.

[I]ndividual permanent catch quotas of a regulatory-determined TAC are *only a stage* in the development of management from licensing to private rights. This evolution can be expected to continue until the owner has a share in management decisions regarding the catch; and, further still, *until he has an owner's share in management of the biomass and its environment...* [Scott 1989:33, emphasis added].

The logic train that leads to these conclusions is straightforward. *If* one believes that ownership promotes stewardship and the resource in need of stewardship are fish, then “owning” a permit that entitles one to catch a share of an annually variable TAC is somewhat removed from owning the particular fish in need of stewardship. Further, even owning the fish would not be fully adequate to protect them since they are free-swimming and exposed to an environment that could be alternately benign or harmful. From this viewpoint, to exercise full care over the fish, one needs to exercise full care over the marine environment itself.

Our point here is not to challenge the logic employed above (we take up that challenge later) but to establish the facts of what is in the fisheries economics literature. In our view, all participants in ongoing debates over fisheries policy must understand that in the rights-based fishing literature, catch shares are not the *end* point of some logical imperative but merely a necessary *starting* point of a hoped for and inevitable evolution toward complete private control of coastal fisheries and their habitats by the fishing industry. Thus, we now see serious works openly calling for “the privatization of the oceans” (see, e.g., Hannesson 2004).<sup>5</sup>

The extreme emphasis on privatization and private property rights found in the fisheries literature is matched by the extent of the devolution to industry envisioned in that same literature—as noted, self-regulation is the desired goal. Perhaps most extreme is the occasional tone directed at the current management system in the U.S.: “‘Communism isn’t dead... Central planning is still thriving in our fisheries management’ [Pressman 2006].”<sup>6</sup>

In contrast to the steady emphasis on property rights in the fisheries literature, the reports of two national ocean policy commissions did not focus on, nor present, rights-based prescriptions (POC 2003; USCOP 2004). In fact, one of the commission reports carefully discussed catch shares as *privileges* (see USCOP 2004:289) and the distinction between privileges and rights was drawn in Congressional treatment of catch share programs in both the 1996 and 2006 reauthorizations of the Magnuson-Stevens Act (P. L. 104-297; P.L. 109-479). But 2008 saw a marked escalation of emphasis on privatization and property rights. Most notable was a publication in the journal *Science* and the subsequent press coverage it received worldwide. Costello *et al.* (2008) contrasted the performance of fisheries around the world with and without catch share systems by looking at data but *explained* the results they observed in

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<sup>5</sup> Others, including one of the main authors in the EDF/Reason/PERC partnership, call for private ownership of whales (see, DeAlessi 1997).

<sup>6</sup> Pressman is quoting a well-known fisheries economist, active in the discussion of sectors. We think the regional council system is a far cry from communism as a political system and even the most cumbersome assemblage of input controls is hardly a planned economy.



terms of the standard assumptions regarding the causal properties of property rights and the assertion that ownership promotes stewardship.

This rights emphasis in Costello *et al.* (2008) was then amplified in announcements of their findings, both in the same issue of *Science* (“Privatization Prevents Collapse of Fish Stocks, Global Analysis Shows [Stokstad 2008]”), and other outlets such as *The New York Times* (“Privately Owned Fisheries May Help Shore Up Stocks [Dean 2008]”) and *The Economist* (“Scientists find proof that privati[z]ing fishing stocks can avert a disaster [Economist 2008]”). Shortly after Costello *et al.* was released, a companion and derivative article appeared in the journal *Nature* repeating the ownership explanation (Heal and Schlenker 2008).

As is evident in the discussion above, academic economists have played a central role in developing the literature emphasizing property rights and devolution of authority. But the recent crescendo is due to the complementary influences of philanthropic foundations and other NGOs with a conservative, if not libertarian, political ideology. Among the most influential forces appears to be a partnership between the Environmental Defense Fund (EDF), the Reason Foundation, and the Property and Environment Research Center (PERC) known as “IFQsForFisheries” supported by funding from the Alex C. Walker Foundation, the Bradley Foundation (funds passed through the Sand County Foundation), the Charles G. Koch Foundation, and the Wilkinson Foundation.<sup>7</sup> More recently, other foundations have joined in the promotion of catch shares including the Walton Family Foundation, the Gordon and Betty Moore Foundation, and the Paul G. Allen Family Foundation.

#### *4) From theory to practice in New England*

The current interest in sectors under Amendment 16 is occurring in an environment influenced by the theoretical emphases and players reviewed above. Perhaps the most striking evidence of this influence is the suggestion reported in *The New York Times* that the Obama administration is interested in “privatizing” U.S. fisheries (via sectors):

The National Oceanic and Atmospheric Administration, the federal agency that regulates ocean fishing, is taking preliminary steps toward privatizing fisheries in New England, the agency’s administrator said Wednesday [Dean 2009].

The emphasis on devolution and deregulation in the fisheries literature is also evident in the approach to sectors under Amendment 16:

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<sup>7</sup> The current project website ([www.ifqsforfisheries.org](http://www.ifqsforfisheries.org)) downplays the participation of EDF but a search of the Web Archive locates a 2004 entry that clearly describes the partnership as does the linked article in *Philanthropy*, see:

<http://web.archive.org/web/20040417023615/www.ifqsforfisheries.org/about.html>  
<http://web.archive.org/web/20040415025947/www.philanthropyroundtable.org/magazines/2004/january/Adventures+in+Philanthropy.htm>

The three-party partnership continues as evidenced by recent publications such as Leal *et al.* (2008).

Still in the making, the ‘catch share’ system is to be based on a series of cooperatives known as ‘sectors,’ which shift much responsibility from government to the private structures [Gaines, 2009a].

The New England situation is also consistent with, and reflective of, the national picture in terms of the private funds and partnerships involved. The principals in the EDF/PERC/Reason partnership are active in the movement towards sectors (see, *e.g.*, Leal 2006), as is the Sand County Foundation (see, Petruncy-Parker 2007). The Moore Foundation has given significant amounts focused on the adoption of catch shares in the region.<sup>8</sup> The widely touted Costello *et al.* (2008) and the related Heal and Schlenker (2008) papers are influential in the New England setting— for example, both papers were cited as part of the supporting rationale for approval of a sector program in state waters in Rhode Island (Sullivan 2009).

Sectors are thus a home-grown concept being debated within a context that is inextricably linked to national events and a half-century of fisheries literature. With this background in hand, we turn now to our interviews with stakeholders in the New England consideration of sectors.

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<sup>8</sup> See: [www.moore.org/marine-conservation.aspx](http://www.moore.org/marine-conservation.aspx) ; and [www.moore.org/init-grants-awarded.aspx?init=112](http://www.moore.org/init-grants-awarded.aspx?init=112)

### III. Gauging Support for Sectors

The previous section documented our understanding of sectors as they are being contemplated under Amendment 16. We used this understanding as our background for conversations with industry members, sector managers, and state and federal managers. Almost immediately, we encountered what, to us, was an unexpected state of affairs. Support for sectors was much more varied than we anticipated given popular accounts regarding the embrace of sectors. In some cases, people were both notably dismissive of sectors and yet resigned to their apparent inevitability.

It was also clear that there is a rough division in New England between what might be called a “managerial” class and the “rank and file” fishers of the groundfish fleet. The former includes those most closely involved with the Council process whereas the latter includes people who may have very little knowledge of, or exposure to, the Council, yet ultimately may be very affected by Amendment 16 (however it is finally constructed and implemented). Generally, the support for, and outright promotion of sectors rests most clearly in the managerial class whereas the rank and file display the most diverse views on sectors. When reviewing the tapes of Council meetings associated with sectors, we found a segment of industry testimony that nicely captures this dichotomy (see Text Box 1).<sup>9</sup>

From our conversations, it also appears that understanding of sectors is highly varied across both industry and non-industry. “Sectors” for some represent something quite specific, while for others they are just anti-matter—an alternative to the status quo and therefore, almost by definition, an improvement. As a gross generalization, we have found that the firmest grasp of the sector concept is held by certain sector organizers, sector managers, and government fishery managers. Some, but clearly not all, boat owners are also quite knowledgeable about sectors, as are *some* hired captains. Crew are often totally unaware of what sectors are, beyond a new noun in the lexicon of fisheries management. This wide range of familiarity with the concept regarded as the last best hope for New England groundfish is cause for concern.

Most critically, we think it is important to have an accurate picture of how people are thinking about sectors *and* to understand reasons why those thoughts might depart from the popular depiction of broad support for sectors. As noted, our exchanges with industry in particular suggest that the embrace of sectors is not as emphatic or as universal as might be inferred from popular accounts. Our sense is that support for sectors reflects a fragile coalition of differing interests rather than a uniform conviction in the superiority of sectors. Below the surface appearance of widespread support, we found a more complicated picture of reasons for both support and doubts about sectors (and for some people these are not mutually exclusive categories).

**Text Box 1: The rank and file vs. the managerial class:**

“The rank and file fishermen are not so interested going off, jumping over the sector cliff as are maybe some folks in this room.”

<sup>9</sup> Source: Public testimony from industry recorded at the January 24, 2008 meeting of the NEFMC in Danvers, MA.



In the sections that follow, we provide several reasons why industry support for sectors may be more complicated than many in the managerial class seem to think is the case. We focus on factors that may be contributing to this divergence. We stress that we are reporting on what people told us.

*a) Sectors were the only alternative*

One reason sectors are attracting so much attention is because they represent the only alternative offered by the Council during most of the development of the Amendment 16 package to the status quo management regime based on controlling days-at-sea. Early in the Amendment 16 process, proposals for individual transferable quotas (ITQs), a “points system” (featuring tradable biologically referenced points rather than pounds of fish, see NESC 2007), and a proposal for area-based management were all dropped from further evaluation.

In one sense, the widespread embrace of sectors is thus driven by the elimination of alternatives, rather than by an independent preference on the part of industry for sectors over all alternatives. The status quo management regime seems increasingly politically unacceptable to many managers and industry participants.<sup>10</sup> In this situation, people are desperate for *any* alternative to the status quo. In this context, if the Council is only considering one alternative to the days-at-sea regime, it is not surprising that there is widespread “support” for that alternative.

We think that caution is warranted when interpreting this apparent support for sectors. All that the current embrace of sectors tells us is that people prefer sectors to the status quo (or to what they imagine will be the horror of the common pool fishery). It tells us nothing about how they feel about sectors versus other potential alternatives. Based on conversations with industry, our sense is that some, perhaps many, people are settling for sectors while knowing that sectors are not what they really want (see Text Box 2).<sup>11</sup> Sectors end up as the preferred alternative by default.

It must be acknowledged that the Council was facing, or acting under the influences of, external pressures when it eliminated other alternatives early in the Amendment 16 planning process. For example, consider the fate of an alternative based on individual transferable quotas (ITQs):

The Council decided not to pursue an ITQ proposal because recent changes to the M-S Act impose a requirement for an industry referendum before an ITQ can be implemented. The Council does not believe there is enough time available to develop a proposal and

**Text Box 2:  
Supporting  
Sectors, but....**

Q: From what you are saying... are you saying that you are investing enormous amounts of human and financial capital in pursuit of a system [sectors] you do not really want?

A: Yes.

<sup>10</sup> Although we note that one manager did suggest to us that the unpopularity of days-at-sea is only recent and wondered aloud whether this newfound unpopularity reflected the fact that the allowable days-at-sea had been reduced down so far that the reductions were actually having an impact on fishing mortality (i.e., on the total catch of individual operations and the fleet in aggregate).

<sup>11</sup> Source: Interview with industry member/sector organizer.

complete the referendum in time for a May 1, 2009 implementation date [A16DEIS 2008:23].

Supporters of an ITQ alternative noted the irony in this rationale: subsequent to the decision to eliminate any ITQ alternative, it was decided that sectors themselves could not be implemented by the May 1, 2009 date. But sectors remain the only alternative to the status quo under consideration by the Council.

*b) Uncertainty over Council Commitment to Sectors*

While sectors represented the only alternative to the status quo, the Council approach to sectors was marked by a kind of “on again, off again” pattern, especially in the earlier stages of the process. The table below (Table 1) illustrates this aspect through a partial chronology of Council actions regarding sectors in Amendment 16 (Table 1 is excerpted from a more complete chronology presented as Appendix I to this report).

Table 1: NEFMC SECTOR TIMELINE—key events in bold

|                                                              |                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| February 22, 2007 - Sector Omnibus Committee (first meeting) | - Debate over sectors as LAPPs<br>- Role of hard TACs in a sector                                                                                                                                                                                                                                                   |
| March 29, 2007 – Sector Omnibus Committee                    | - Sectors will establish ACLs and AMs<br>- Sector shares allocated a % of ACLs<br>- Discuss sector size and “sideboards”                                                                                                                                                                                            |
| April 20, 2007 – Groundfish Committee                        | - Debated over whether to do DAS alternatives in Am. 16 or 17, tabled the debate until May 31.<br>- Requested the Council include changes to specific groundfish sector guidance in Am. 16                                                                                                                          |
| May 31, 2007 – Groundfish Committee                          | - <b>Recommend that sectors and other DAS alternatives belong in Am. 17</b>                                                                                                                                                                                                                                         |
| June 19, 2007 – NEFMC                                        | - Approves a “Sector Policy”                                                                                                                                                                                                                                                                                        |
| June 21, 2007 – NEFMC meeting                                | - <b>Vote to include sectors and allocations to sector members in Am. 16</b><br>- Other DAS alternatives, including IFQ, points system, and area management remanded to Am. 17<br>- No more sector proposals will be included in Am. 16<br>- Sector omnibus committee disbanded                                     |
| September 18, 2007 – NEFMC meeting                           | - <b>Work on sectors is suspended</b> until the groundfish committee completes a plan for May 2009 biological targets that include: DAS modifications, annual catch limits, accountability measures, recreational measures.<br>- Groundfish committee directed to consider a hard TAC backstop for the common pool. |
| November 7, 2007 – NEFMC meeting                             | - Council approved recommendations by the groundfish committee for DAS modifications and a hard TAC backstop to help meet the ACL/AM requirements, as well as alternatives to mitigate fishery problems with the hard TAC.                                                                                          |

|                                          |                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          | <ul style="list-style-type: none"> <li>- Council agrees that ACL/AM process requirements will be in Am. 16</li> <li>- <b>Council votes to direct the groundfish committee to continue work on sectors, DAS modifications, recreational measures, and ACL/AM processes for Am. 16.</b></li> </ul>                            |
| December 7, 2007 – NMFS letter to NEFMC  | <ul style="list-style-type: none"> <li>- NMFS NERO sends a letter to the Council expressing concerns that Am. 16 and sectors development will not be completed on time. <b>The letter suggests delaying sector implementation until 2010.</b></li> </ul>                                                                    |
| December 13, 2007 – Groundfish Committee | <ul style="list-style-type: none"> <li>- Discuss the letter from NMFS</li> <li>- <b>Debate whether to push back sectors, possibly IFQ until Am. 17</b></li> <li>- It is revealed that confidentiality/ownership issues are slowing the permit history process.</li> <li>- Recommend sector baseline alternatives</li> </ul> |
| April 16, 2008 – NEFMC meeting           | <ul style="list-style-type: none"> <li>- Discussed sector allocation, ACL/AM issues</li> <li>- Proposed AMs for common pool remanded back to the planning development team</li> <li>- <b>Start date for sectors delayed until 2010</b></li> </ul>                                                                           |
| June 4, 2008 – NEFMC meeting             | <ul style="list-style-type: none"> <li>- <b>Am. 16 development put on hold</b> due to changing rebuilding targets associated with less productive stocks and concern that the draft effort control measures in Am. 16 may not be targeting the correct stocks.</li> </ul>                                                   |

The pattern of the Council's consideration of sectors resulted in influences on support for sectors that cut both ways. On one hand, the wavering Council pursuit of sectors can clearly be interpreted as less than full support for sectors, and it seems likely that this may have influenced some individuals to be similarly hesitant. On the other hand, some fishers may not have been paying close attention given the sense that the Council was not fully committed to sectors. The high demands in terms of time and attention on the average member of industry trying to stay informed on sectors are not conducive to broad participation in the policy process. In essence, because of the Council's wandering approach to sectors, we sense that some people in industry may have stopped paying close attention to the developing sector policies (even if they had enrolled in a sector), and it is not clear whether this detachment should be interpreted as support, opposition, or indifference.

We are not saying that the sector process in the Council is particularly unique or different in this regard than other management regimes constructed by the Council. It is likely the case that for many, if not most, Council actions, many people do not express their opinions until after the Council has reached a final decision and an actual change in the status quo regulatory structure is incipient. This seems to be the nature of fishery management in our experience. Our point is simply that the process itself is one in which it is often hard to accurately gauge support and the stop/start nature of the sector development process may have augmented this ambiguity. See the



industry testimony to the Council presented in Text Box 3 for a vivid example of how some in industry discounted the Council's commitment to sectors.<sup>12</sup>

*c) Commitment Required While Details Still Vague*

The National Marine Fisheries Service initially required industry members to sign up for (or in the vocabulary used by the National Marine Fisheries Service and the Council, to "enroll" in) sectors by March 1, 2008, *before* the details of sectors and sector implementation had been determined.<sup>13</sup> Originally, industry was told there was a fixed, and quite limited, window of time in which to apply for entry into sectors. This limited window helped create a sense of fleeting opportunity because there was no time for individuals to wait for full details or to develop a complete understanding of sectors. Our impression is that people perceived they were being "forced" (get on the train now or miss it) to choose between the common pool (which they feared) and sectors (which seemed new and attractive if not fully understood). Thus limited time (to decide) compounded the effect of only a single alternative. Our point is that the early, large, rapid enrollment in sectors cannot necessarily be interpreted as deep support for sectors.

Due to the delay in implementing sectors (see Table 1), the original enrollment cut-off date was relaxed, and the sense of a rushed, less-than-fully-informed choice will be eliminated if the Council determines sector program specifics before any new enrollment cutoff date is set for fishing in the first year under sectors (note that there will be an enrollment cutoff date for each subsequent year). At present, however, knowledge of sector program details remains slim for much of the fleet and many fishers did go through the enrollment process with little to no knowledge of sectors. Not only are portions of industry unaware of key program details, many individuals also do not yet know what their qualifying catch history will be because of difficulties in obtaining history verification from the National Marine Fisheries Service.<sup>14</sup>

Furthermore, individuals enrolled through sector organizers and in some cases these organizers were industry associations overseeing multiple sectors. It is our understanding that some individuals who enrolled in a sector will not know which sector they belong to until these associations assign them to a specific sector. Thus the mere act of enrollment cannot be interpreted as strong support for sectors.

Clearly people have a responsibility to inform themselves about critical decisions in their lives and our point here is not to suggest that lack of detailed familiarity with sectors is somehow a result of Council actions. Rather we merely want to emphasize that our interviews suggest that

**Text Box 3: Not taking the Council Seriously on Sectors...**

"I just talked to three people actually who are out at sea today, a guy on my boat, and some friends on other boats, and we talked about this issue and they said nothing is going to happen. What the rank and file don't realize is that this decision today is a huge thing."

<sup>12</sup> Source: Public testimony from industry recorded at the January 24, 2008 NEFMC meeting in Danvers, MA.

<sup>13</sup> There was also a drop-out or bailout date set for June 1, 2008.

<sup>14</sup> It is our understanding that the difficulties have to do with obtaining legal releases from all previous vessel owners during the qualifying period.

there are serious limits to how informed many people were (and are) about sectors (for example, concerning the relationship between sectors and TACs). Some, perhaps many, fishers may not know what they are supporting and we think there is a real possibility for explosive reactions within the fleet once the reality of fishing under TACs, albeit under sectors, plays out.

*d) Support for Sectors is Influenced by Feelings about ITQs*

Support for sectors is critically influenced by feelings (on the part of industry, Council members, and others involved in the discussion of sectors) about individual transferable quotas (ITQs). Both proponents *and* opponents of ITQs support sectors, but for opposing reasons. On one hand, our conversations with industry and managers suggest that there is more support for ITQs than is publicly acknowledged. But in the face of the Council decision to drop consideration of ITQs (itself influenced as mentioned above by recent changes to the Magnuson-Stevens Act), some proponents of ITQs have reluctantly accepted sectors as their next-best alternative.<sup>15</sup> Additionally, some ITQ proponents view sectors as a stepping-stone in an inevitable march to ITQs.<sup>16</sup>

Opponents of ITQs, on the other hand, embrace sectors because they regard them as an antidote to the trend towards ITQs. While ITQs focus on the individual, many believe that sectors provide a community oriented alternative. Some proponents of sectors claim they are a form of community-based fisheries *management*. Thus both opponents and proponents ironically embrace sectors because they believe sectors will be associated with a trajectory away from/towards ITQs. There is a real possibility that both some proponents and opponents of ITQs may feel substantially disappointed by sectors if their expectations are not met—and by definition, the expectations of both groups cannot be met, as they are mutually exclusive.

*e) Sectors as the “Allocation Amendment”*

Regardless of how people feel about ITQs, many people we talked with feel that sectors will establish what they call “the allocation,” meaning that they think some additional form of rationalization program *is* most likely coming, and that the initial allocation established now, in the debate over sectors, will be the basis of that future program. Publicly, there is disagreement between Council members about whether they are in fact establishing the allocations for any rationalization program in the future (beyond sectors). Industry members on the other hand, are far more wary of the implications of sectors for the future (see

**Text Box 4: The Allocation Amendment:**

“What I do find problematic, is the way the Council is going with this here now, we’re doing the allocation to support the sectors under the sector guise. The way I follow this here now, is we are going to reallocate in this amendment under the guise of sectors...”

<sup>15</sup> Within this group we note that there are some who would prefer a modified version of the present DAS system over even ITQs but feel that the new Magnuson-Stevens Act requirements for strict catch limit preclude that option and thus they have turned to ITQs.

<sup>16</sup> We did encounter some ITQ proponents who, while accepting sectors as a stepping-stone, are concerned that sectors might stall movement towards what they regard as the superior tool (ITQs).

Text Box 4 for an example from industry testimony to the Council).<sup>17</sup> As reviewed above, many see that future as involving ITQs and there is thus an inherent link between concerns about “the allocation” for sectors and ITQs (see Text Box 5 for an example of industry testimony to the Council featuring this linkage).<sup>18</sup>

Some of those who were not in favor of sectors in principle told us that they signed up for sectors because they thought it was the way to preserve their allocation under future management scenarios they suspected were coming. We were told that some people accepted sectors to avoid “being left behind.”

No doubt this statement may strike some readers as implausible or illogical: how can an individual be “left behind” by not supporting sectors? But this is an issue of feeling, not logic *per se*. We are reporting what we encountered and we have no doubt that this concern, even fear, was real in the minds of those expressing it. To us, this emphasizes just how uncertain and confused some people are regarding sectors.

Whether or not an individual supports sectors or enrolls in a sector, every groundfish permit will be marked in the future with a potential sector contribution. In this sense, no one will be left behind and regardless of whether they initially join a sector or not, individuals’ potential sector contributions will be established by the initial allocation scheme crafted by the Council. If the Council picks some new rationalization plan in the future but carries forward these potential sector contributions, they will carry forward for all. However, if the Council were to base future allocations on new, post-sectors catch history, it is possible that some people in the common pool could have lower catch histories (than the potential sector contributions on their permits) due to competition for the TAC in the common pool.

While we have confirmed our understanding of how potential sector contributions will be attributed to permits (regardless of the sector enrollment status of the permit holder) with NMFS staff, we do not know if this has been established in writing anywhere. We emphasize that people are not making up these fears (of being left behind by a future allocation). There *is* confusion surrounding this aspect of the sector debate, and people are taking action based on this confusion.

#### f) Enrollment in Sectors Obscures Concerns About the Fairness of the Process

As we have cautioned above, the mere fact that large numbers of the fleet have signed up to enroll in sectors is not necessarily evidence of broad support for sectors. Not a single industry member out of those we

#### **Text Box 5: Sectors as ‘backdoor’ ITQs?**

“I think we’re talking about allocation and there is not a person in this room that doesn’t believe that what allocation we do for a sector is not eventually going to carry forward into an ITQ system. The points that I have written down apply to sector allocation and they also apply to the ITQ, which we are basically developing right now. . . we are in a backdoor way getting into ITQs by allocating to the sectors in a given manner, and the Council is not going to revisit this thing and fight the battle twice...”

<sup>17</sup> Source: Public testimony from industry recorded at the January 24, 2008 NEFMC meeting in Danvers, MA.

<sup>18</sup> Source: Public testimony from industry recorded at the January 24, 2008 NEFMC meeting in Danvers, MA.



interviewed expressed confidence in the fairness of the process (for example, see Text Box 6).<sup>19</sup> While there is widespread dislike, even fear, of continuing with the present days-at-sea system, the feeling that sectors are being pushed on people is no less pervasive.

Concern for the process extended across both supporters and opponents of sectors. For example, we talked with people who were very supportive of and invested in sectors but told us they felt that various management bodies (e.g., DMF or NMFS) had a vision for sectors that was not fully supportive of how these individuals saw sectors. These individuals reported feeling frustrated by what they saw as their inability to influence the process to fully support their vision. The general point here that spans across all the people we talked with is one of perception: we encountered strong beliefs about the unfairness of, and lack of equal access to, the policy process. We suspect that this verdict on the process reflects an amalgamation of the concerns reviewed individually above in this section. Undoubtedly, individuals weigh the various aspects of the overall process differently but we are struck by the unanimity of the assessments on the overall process.

*g) Summary:*

A variety of factors have resulted in a sort of “stampede” effect and we think it is important to acknowledge from a policy process standpoint that support for sectors may be much more varied than appears to be believed by those in the managerial class.

**Text Box 6: A  
Conversation with  
a sector manager**

Q: What is your view of the appeal of sectors?

A: They suck, but it is better than what is going on now. [Because of the other sectors] [w]e were forced to join one.

Q: Was the process fair that lead to sectors?

A: No.

Q: How do sectors compare to ITQs?

A: An IFQ would be better, and that's what the majority believe.

Q: Do most people have a good understanding of sectors, what they are, how they will work?

A: Not at all.

<sup>19</sup> Source: Interview with a sector manager.

#### IV. A Policy Evaluation of Sectors

Sectors are a management tool that must, like all tools, be evaluated on the grounds of how well they meet their goals. We sense that much of the push for sectors seems to be propelled by a belief in sectors as a goal in themselves rather sectors as a tool that can be used to reach a fishery management goal. Nonetheless, the Council has stated that “the goals and objectives” of Amendment 16 “remain as described in Amendment 13 [A16DEIS 2008:24].” The goals and objectives described in Amendment 13 that are particularly relevant in terms of sectors are:

Goal 1: Consistent with the National Standards and other required provisions of the [Magnuson-Stevens Act], manage the northeast multispecies complex at sustainable levels.

Goal 2: Create a management system so that fleet capacity will be commensurate with the resource status so as to achieve goals of economic efficiency and biological conservation and that encourages diversity within the fishery.

Goal 4: Minimize, to the extent practicable, adverse impacts on fishing communities and shoreside infrastructure.

Goal 6: To promote stewardship within the fishery.

Objective 3: Adopt fishery management measures that constrain fishing mortality to levels that are compliant with the Sustainable Fisheries Act.

In addition to these statements pertaining to Amendment 16 in general, the Council has articulated specific goals for sectors [A16DEIS 2008:40].<sup>20</sup>

- \* Address bycatch issues
- \* Simplify management
- \* Give industry greater control over their own fate
- \* Provide a mechanism for economics to shape the fleet rather than regulations (while working to achieve fishing and biomass targets)
- \* Prevent excessive consolidation that would eliminate the day boat fishery.

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<sup>20</sup> A review of the tapes of Council sessions reveals that these goals were *not* intended to be goals for sectors on the whole, but goals for the *initial allocation* mechanism used to determine the “contributions” a vessel brings to a sector (see, <http://www.nefmc.org/actions/index.html>, link for Jan 24, 2008, Audio Recording #2). We ignore this distinction because we do not understand it (for example, it does not make sense to speak of an initial allocation option that gives “industry greater control over their own fate”), but this strange episode *does* serve to highlight just how hard it is at times to follow the Council consideration of sectors.

In the discussion that follows, we will walk through these goal statements (grouping them based on thematic similarity and not distinguishing between goals and objectives), considering how sectors might contribute to attaining each goal and whether the goals themselves are consistent with the context of fisheries management under the Magnuson-Stevens Act.

a) Conservation versus Stewardship

The Council has articulated both conservation and stewardship goals for Amendment 16 (see Goals 1, 2, 6 and Objective 3 above). We think it is important to consider these goals individually.

*1) Conservation*

Goals 1 and 2 and Objective 3 relate to the desire to curb overfishing. However, it is not clear how sectors *per se* will accomplish these goals. The Council talks of sectors as “additional tools to meet mortality objectives,” and there is a suggestion that sectors are regarded as “accountability measures” (themselves a new mandate in the reauthorized Magnuson-Stevens Act) that will help to end overfishing (see for example, A16DEIS:19). At other times, the Council’s consideration of sectors seems motivated mostly by an interest in sectors as a business planning tool for industry: “sectors are primarily formed to realize efficiencies in the use of vessels out of the consolidation or redistribution of sector vessel effort. . . [A16DEIS:124].” Ultimately however, in this report we regard it as self-evident that sectors *have* to be about conservation (stopping overfishing) in light of mandates from both Congress and the courts that propelled first Amendment 13 and then Amendment 16.

As we noted earlier in Section II, sectors as a form of catch share program feature a TAC that is subsequently divided into catch shares. While the subdivision of the TAC into individual catch shares provides undoubted economic benefits to fishers, the *primary* conservation benefit in such systems derives from imposition of the TAC itself rather than the subdivision of the TAC. Nonetheless, the subsequent division of the TAC into catch shares *does* provide additional conservation benefits. For example, assigning catch shares enables finer attainment of the TAC with less likelihood of over-shooting the TAC and protects against a derby fishery. In addition, there is less lost gear (particularly in fixed-gear fisheries) and thus less ghost fishing. However, these are additional benefits and are relatively small compared to the conservation benefits derived from the existence of a TAC – a fact often overlooked in discussions of catch share programs, where the assumption often seems to be that catch shares themselves hold the primary conservation promise inherent in such systems (see, e.g., Costello *et al.* 2008).

We believe that the success of sectors will depend in large part on understanding and careful attention to the role of TACs in catch share systems. Recall the assertion that the primary cause of overfishing is the alleged lack of property rights (Anderson and Holliday 2007). Ironically, these same authors contradict their property rights analyses by acknowledging the central conservation role of TACs:

A TAC that conforms with other parts of the MSA [Magnuson-Stevens Act] will ensure that there are no problems with overfishing [Anderson and Holliday 2007:24].



The point is that *overfishing is caused by overfishing*—catching too many fish—and this is addressed by the imposition of catch limits that—limit catch. Thus, the primary conservation benefit of sectors will come from the underlying introduction of TACs. Of course the confident pronouncement quoted above should be qualified by recognition that successful TAC management requires both the ability to set the TAC “correctly” *and* the ability, commitment, and political will to monitor and enforce attainment of the TAC. Setting the TAC “correctly” is a critical matter to be sure, but the challenge is not insurmountable. The Magnuson-Stevens Act sensibly calls for the best effort possible (in terms of setting catch limits) under given circumstances. Present circumstances surrounding stock assessments of groundfish off New England seem far from ideal, but this unfortunate situation does not endorse the alternative of fishing without strict limits on the aggregate fishing mortality inflicted on the target and by-caught stocks.

We sense that the some of the conversation about sectors verges on a form of denial regarding the reality that sectors *will*, by definition, involve TACs. That is, sectors seem to be regarded as a way to cope with new mandates in the Magnuson-Stevens Act regarding TACs in a way that will somehow make TACs less like TACs. Here it is useful to place the current interest in sectors in the larger context of recent evolution of the Magnuson-Stevens Act.

A brief history would note that with the Sustainable Fisheries Act (SFA, P. L. 104-297) amendments of 1996, the U.S. Congress signaled a new commitment to address chronic overfishing in many regions of the country—including New England. A decade later, the Magnuson-Stevens Reauthorization Act of 2006 (MSRA, P.L. 109-479) could be interpreted as Congress saying “no, we really meant it in the SFA, you have to stop overfishing,” and, with perhaps a nod in the specific direction of the NEFMC, Congress *mandated* that all regional councils must adopt strict “annual catch limits” (i.e. TACs<sup>21</sup>).

Our conversations with industry and managers confirm a well-known disdain for TACs throughout much if not most of the New England groundfish community that extends to some managers. This attitude appears to be both deep-rooted and longstanding, dating back to a very early failed attempt at introducing TAC management to New England (see, *e.g.*, Pierce 1982). The “problem” with TACs appears to be that fishing must cease when the TAC is reached. The specter of having to tell the fleet to stop appears as haunting anathema in Pierce’s (1982) account of the early formative (negative) experience with TACs. Related to the disdain for TACs is an article of faith in New England that “TACs don’t work.”

There is thus a contradiction involved in New England’s embrace of a tool that requires TACs—a tool whose conservation promise lies in the fact that a TAC is established (and presumably adhered to). Ironically, what some individuals like least about sectors, and what may pose the greatest challenge to sector management, is the enforcement of the TAC. The puzzle is, then, how can people reject TACs while embracing sectors?

Council documents and discussions suggest a belief that this conundrum is to be resolved by just turning the problem over to industry:

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<sup>21</sup> The MSRA introduced a new acronym into the lexicon of fisheries management: ACLs (annual catch limits). Though there is much clever wordplay involved in distinguishing between ACLs and TACs, for the purposes of this report we will treat the terms as synonymous.

By not mandating the commitment time to a sector and allowing the sectors to set their own rules, the sector might be more successful in the long-term. This success will be realized, while working within their allocation (hard TAC), the group will be largely self-regulating [A16DEIS:43].

In this quote, we see an emphasis on devolving management to industry, and a logic that seems to suggest that devolution itself will make TACs more palatable (or perhaps just less noticeable), easier to conform to, and thus, more likely to succeed. In essence, devolution has been positioned as being equivalent to conservation by virtue of the belief that the sectors “will be largely self-regulating” (most notably in terms of staying within their TACs). As we noted in Section II, belief in devolution features prominently in the movement towards sectors (and reflects a similar emphasis in the fisheries literature). Without challenging the belief in devolution on ideological grounds, it should be noted that the operational problems inherent in determining and then implementing and enforcing TACs are not necessarily made *any* easier by assigning these problems to industry. Shifting the incidence of the problem is not the same as solving the problem.

Hopefully, there will be conservation gains under sectors, but this reflects the conservation that can, potentially, be realized by TAC management, not some inherent benefit of putting industry in charge. But there will be additional expenses and work over and above a TAC-only system. As reviewed above, assigned catch shares are generally expected to produce less overruns of the TAC in comparison to the simpler case of a fleet-wide TAC (without assigned catch shares). But the finer control over attainment of the TAC under catch share systems is due to the fact that enforcement (and accountability) has been brought down to the *individual* vessel level. Under a simple fleet-wide TAC there is no such thing as holding an individual vessel accountable for “catching too much.” There is no basis to think that the monitoring and enforcement needs are lessened by the additional partitioning of the TAC into individual catch share assignments. In fact, the opposite is more likely:

Problems with enforcement of quotas apply equally to ‘global’ quotas and to individual quotas and may even be greater in individual quota- managed fisheries because of the additional surveillance requirements to monitor quotas at an individual vessel level [Morgan 1997:4].

This quote highlights what we call the “individual accountability challenge” posed by catch share programs. Under sectors, this burden of monitoring and enforcing individual vessels has not gone away, it has merely been shifted to the sector managers. It is true that sectors allow harvest overages by individual vessels to be compensated for by reallocations within the sector. Thus, sectors provide a measure of flexibility compared to an individual quota program (where the only way to adjust is to buy or lease additional quota on the open market) and this cooperative flexibility may be appealing to both industry and managers. However, individual vessel catches must still be tracked with accuracy and we sense that the cooperative flexibility of sectors may only be deflecting attention away from the individual accountability challenge.

Under sectors, federal regulators will focus on whether a particular sector stays within its aggregate share of the overall TAC. But accountability at the individual vessel level is still necessary. Sector managers will thus have to confront the enforcement and accountability (not to

mention liability) problems that are ultimately focused on the individual vessel level. In a multi-species fishery prosecuted with relatively non-selective fishing methods, these accounting problems are expected to be substantial. Conservation depends on the ability to “solve” the individual accountability challenge. Devolution merely devolves, it does not solve, the individual accountability challenge.

In our view, more time should be devoted to thinking through the challenges of TAC-based catch share management. *Any* form of catch share-based management carries with it a substantial enforcement and monitoring challenge that must be addressed with realism. The past record of TAC management in New England suggests that the management infrastructure and cultural commitment to enforcement that is necessary for effective TAC management is lacking. Sectors will fail on the conservation front unless this situation is addressed.

A report on monitoring and enforcement needs associated with sectors by consultants contracted by The Gulf of Maine Research Institute drew upon experiences with catch shares within the British Columbia multispecies trawl fisheries. This report underscores the central importance of monitoring:

The primary tool used to sustainably manage groundfish fisheries is the total allowable catch (TAC). TACs are generally set at a level where the annual fishing mortality will not decrease the standing stock. This requires knowledge of the true annual catch and mortality. *It is extremely difficult to ensure catch mortalities are kept within TAC limits when all mortalities are not accounted for.* Specifically, managers need an accurate accounting of the total catch and release mortality on a stock specific basis [Turris and McElderry 2008:2, emphasis added].

Our conversations with industry suggest that many people are attentive to the scale of the monitoring challenges. However, some key industry members indicated a belief that monitoring and accountability will be relatively easy to accomplish. It is not clear to us that the National Marine Fisheries Service is preparing to alter or augment its existing data collection and catch monitoring programs to meet the challenges posed by sector management. We believe that sectors will be a management failure (perhaps spectacularly so) with respect to conservation *unless* the monitoring and enforcement problems are taken more seriously. As is true of any form of catch share program, monitoring will involve *substantial* costs and we do not agree with industry members who dismiss the cost estimates provided by the outside consultants as being too large to be credible.

Finally, there is a distributional dimension to providing for conservation that may not be fully understood by all participants in the sector discussions. Because sectors shift the burden of monitoring at the individual level from federal regulators to sector managers, they shift costs away from the federal government towards industry. Of course, the actual funds for monitoring could still come from federal sources. However, the determination that sectors are not limited access privilege programs (LAPPs) under the Magnuson-Stevens Act may have important implications for who will pay the bulk of these substantial monitoring costs.

Under the Act, cost-recovery from LAPP participants is capped at 3% of ex-vessel value of the catch. But since sectors are not LAPPs (at least under present interpretations), there is effectively no limit on industry contribution to monitoring costs (and estimates of these costs run as high as 20% of ex-vessel value). We are not arguing for or against public subsidies to cover



the costs of monitoring, but we do believe that many participants in the sector debate are not fully aware of the implications sectors hold for who pays for what, and how much they pay.

## 2) *Stewardship*

Often the public rhetoric of sectors invokes “stewardship.” Stewardship appears as both a goal in itself (recall Goal 6 above: “to promote stewardship within the fishery”) and as a mechanism that will deliver the goal of conservation. The two concepts appear intimately intertwined in the minds of those involved, so that when we have asked directly about conservation, we have often been met with replies such as: “well, if sectors work the way we think they will and promote stewardship....”

Though the two terms seem to often be used interchangeably in discussions of fishery management, stewardship is different from conservation. Stewardship is an ethic, an attitude, a responsibility. Conservation is an outcome. Though stewardship often motivates conservation, one can have successful conservation without stewardship. In the context of conversations surrounding sectors, the concept of stewardship appears to be understood as less volitional than an individual or societal ethic, something that is somehow inherent in certain management structures. Participants in these conversations often refer to stewardship as if it (and conservation) will spring forth if only the Council designs the right system.

The expectation of an apparently automatic appearance of stewardship is tied to reliance, in the rhetoric surrounding sectors, on the conviction that ownership promotes stewardship. This conviction is widespread in a contemporary movement emphasizing privatization of natural resources. Examples of the ownership-promotes-stewardship thesis in the context of catch shares and sectors often invoke the legacy of Aldo Leopold in support of the idea that ownership is critical to stewardship (see, *e.g.*, Petruny-Parker 2007; Fahn 2005).

But Leopold did not advocate the conversion of public resources to private ownership (nor the reverse). Leopold concentrated on the difficult issue of how to get private owners to treat their land better. Leopold wrote that the essential problem in land conservation “is to induce the private landowner to conserve on his own land... [Meine 1988:321].” Note the complete undermining of the ownership-promotes-stewardship thesis explicit in this quote—Why would Leopold take it upon himself to “induce the private owner to conserve land” if private ownership inherently causes private owners to conserve land? There is nothing in Leopold’s legacy to suggest, much less assure, that sectors will promote stewardship.

The confusion between stewardship and conservation and the suggestion that a movement to sectors will on its own lead to greater conservation (as a result of sectors inherently fostering stewardship) must be understood as part of a larger uncritical emphasis on ownership that has begun to permeate the marine conservation literature generally. Consider for example the following statement from the National Research Council Committee on Marine Protected Areas:

The failure of communities to limit use of the commons by individuals in the cause of overall community interest and sustainability has led to a shift in most countries to private or government ownership of most land areas. This shift imbues property owners with a strong incentive to protect the land and its resources from overuse and destructive activities, thus empowering the owners to act as stewards of the land [NRC 2000:20].

If the logic of the above quote were sound, one has to wonder why any terrestrial conservation problems exist, given the near-universal ownership of land, whether private or public. The simple truth is that ownership does not *ensure* stewardship *or* conservation. We know (from Leopold among many other sources) that both private and public owners may either care for natural resources or abuse them. If hopes of conservation are pinned on a voluntary attitude change, the expectation that sectors will induce conservation is reckless.

We note that the currently existing sectors *do* seem to be associated with an ethic (or at least a rhetoric) of stewardship, but our understanding is that this ethic derives from the founders of those sectors, and was possessed by those individuals *before* founding the sectors, not acquired as a *result* of running these sectors. That is, stewardship can be introduced to sectors, but sectors will not automatically induce stewardship.

All the speculative emphasis on ownership as an incentive to stewardship detracts from a focus on the important issue of conservation and what makes conservation work. At one point, the authors of a recent, highly influential, report on catch shares emphasize “well-designed catch shares [Costello *et al.* 2008:1680]” but they do not elaborate on what constitutes good design. We think the elaboration of what truly matters in catch share systems (beyond the fact that they assign catches thus removing the incentive to race) is to be found in another recent study. Branch and Hilborn (2008) also invoke the rhetoric of “rights” as “incentives,” but ultimately do not stress this point in their analysis of what makes for successful management of TACs in the challenging context of multispecies trawl fisheries. Instead, these authors describe the key causal mechanism as follows:

The B.C. fishery is managed under an ITQ system *that provides incentives* for skippers to match their catches to individual-species quotas and also minimizes misreporting, high-grading, and discarding *by placing observers on board each vessel and deducting discard mortality of marketable fish from quotas* [Branch and Hilborn 2008:1442-43, emphasis added].

Notice that the critical “incentives” come not from ownership, but from placing observers on board. What Branch and Hilborn call “incentives” look to us like old-fashioned deterrents or *disincentives* in the form of strict monitoring backed up by the certain penalty of stopping fishing when a TAC is reached for either a target species or a bycatch species.

We think the assertions of catch shares unleashing stewardship are inflated rhetoric. If stewardship flowed from the mere conversion in ownership (from the public to private hands), then why are the enforcement costs associated with catch share programs so high (perhaps the highest of any management system, see Beddington *et al.* 2007), why do Chilean scholars publish studies of cheating under catch share programs (Chavez *et al.* 2008), why is the largest factory trawler company operating in the Alaskan pollock fishery (featuring the exclusive “ownership” conveyed by Congress in statute under the American Fisheries Act) under investigation for tampering with the onboard scales that form the basis of monitoring in that fishery,<sup>22</sup> and why was the chief opposition to substantial scientifically recommended TAC reductions in the

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<sup>22</sup> See , “Scale Scandal” at <http://community.adn.com/adn/node/128915>.

Icelandic cod fishery from catch share owners?<sup>23</sup> All of these examples are illustrations of the contest between short term economic gain and long term conservation that is familiar to any serious discussion of the economics of conservation (the classic work on the discount rate in conservation is Clark 1973; in the fisheries context, see, e.g., Macinko and Bromley 2002, 2004; Morgan 1997). There is *never* a guarantee that individual preferences for immediate economic gains will not trump long-term considerations.

In summary, in order to assess the prospects for sector management, it is important to separate the hard realities of effective conservation from dreams of stewardship. If sectors are to succeed in biological terms, it will be only because of a collective commitment to monitoring and enforcement, not because of faith in the power of privatization to promote stewardship.

#### *b) Addressing Bycatch*

The Council has articulated a specific hope for bycatch reduction (see Objective 10 listed earlier) and we have encountered great hopes on the part of both industry and managers that sectors will solve “the bycatch problem.” There seem to be several dimensions to the problem. On the one hand, the current management regime (featuring low trip limits for some species) combines with a multispecies fishery and the dominant mode of harvest by bottom trawling (which is relatively unselective) to produce *bycatch* (the unintended capture of particular fish) and, in turn, *discards* (fish thrown overboard at sea, in this case because they exceed the trip limit). From this perspective, the problem is one of excessive regulatory discards. On the other hand, there is open talk of a “culture of discarding” recognized by industry and said to be growing worse (Turris and McElderry 2008:1). This appears to be delicate phrasing recognizing that industry practices, along with the regulatory regime, are contributing to the problem of excessive discarding.

Of course, one partial solution to the problem is to adopt more selective modes of fishing. One example of this approach is the development of the Eliminator/Ruhle Trawl. Attacking the problem from the other end involves changing the regulatory regime -- and this is where sectors come in to play. At first glance, sectors would seem to offer significant improvement: the current trip limits would be eliminated. But, sectors will not do away with the all forms of catch limits that lead to discarding of overages. Individual vessels will presumably have limits (their catch shares assigned by the sectors), sectors as a whole will have limits, and there will be overarching TACs (in compliance with the new Magnuson-Stevens Act and the basis of sectors as discussed earlier).

The hope expressed to us by some sector managers is that sectors will feature trading within sectors and between sectors and these adjustments will make the overall TAC limits easier to accommodate. Still, whether these adjustments are done through the “point system” (NESC 2006) or through poundage trades, the underlying foundation of sectors is a TAC. Some of these TACs may be quite small and it is certain that there will be a need to make adjustments (in an individual fisher’s or a sector’s total collection of catch shares). The need for adjustments arises because of the problem of catching fish in exactly the right amounts to stay within limits and this is a challenge regardless of whether the catch shares in question apply to targeted *or* non-targeted

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<sup>23</sup> The cod TAC was reduced by about 30 % in 2007, see, <http://news.bbc.co.uk/2/hi/science/nature/6992938.stm>.



(but by-caught) species. A boat that goes over any of their assigned amounts is going to have to “pay” in one form or another (for points or pounds) even within a sector arrangement. At this point, the owner/operator must decide whether the cost of securing additional catch quota is less than the “cost” of discarding. Clearly, there will be a temptation to use discarding to avoid payment, *so long as the likelihood of detection remains low*.

Our interviews with fishers suggest that many believe that there will always be a market and demand for *any* fish they catch and that there will always be quota available to obtain (via purchase or trade) to insure that the sector as a whole never runs into the problem of exceeding its annual allocation. Even with external trades between sectors, there will not be an endless supply of quota, and eventually the fleet-wide TAC will be reached and then fishing must stop. We are concerned that the actual conditions of fishing in sectors under strict TAC management may come as a rude shock to some sector participants and cause more rancor and frustration with management in the future.

The issue of bycatch underscores the importance of credible monitoring to the biological integrity of sector management. A suggestion we heard from some sector managers -- that dockside monitoring will be sufficient -- seems to be at odds with worldwide experience with catch share systems. In our view, there is reason to be concerned about the casual attitude toward monitoring that we encountered in some of our conversations with both industry *and* managers. Catch share systems are known to present enhanced incentives to highgrade and otherwise discard at sea. Again, we emphasize the central finding by Branch and Hilborn (2008): extremely strict monitoring and enforcement programs are needed to overcome the bycatch problem inherent to multispecies trawl fisheries and make TAC-based catch shares work in these fisheries.

### c) Promoting/Preventing Consolidation

Goals 2 and 4, Objective 7, and two of the sector-specific goals articulated by the Council all address aspects of consolidation. However, there is a certain schizophrenia surrounding fleet consolidation in the context of sectors. On one hand, in its endeavor to facilitate conservation and improve the financial condition of remaining fishers, the Council embraces the idea that there is some correct size of the fleet that will be “commensurate” with the resource (see Goal 2 above). Toward this end, the Council notes that sectors “also provide a mechanism for capacity reduction through consolidation [A16DEIS 2008:40].” On the other hand, the Council is concerned about the potential for “excessive consolidation that would eliminate the day boat fishery.”

The contradiction between desiring consolidation yet fearing its impacts on the existing structure of the industry is not unique to the New England Council. Catch share programs around the world are associated with consolidation. Though policy-makers often express after-the-fact concern, even outrage, over the level of resulting consolidation, there should be no genuine surprise because consolidation is what catch share programs are designed to do (see Bromley and Macinko 2007). Sectors are no exception, they are *designed* to promote consolidation and this fact is clearly expressed by the Council. Recall the quote from the environmental impact statement presented above:

[S]ectors are *primarily* formed to realize efficiencies in the use of vessels out of the *consolidation* or redistribution of sector vessel effort . . . [A16DEIS:124,emphasis added].

The pace of consolidation in catch-share programs can be breathtaking: in the first year of the ITQ/co-op fishery in the Alaskan red king crab fishery, the fleet was reduced from about 250 to 89 vessels (Knapp 2006)<sup>24</sup>; in the South Atlantic, a consulting firm estimated that 75%-90% of the fleet would exit the snapper-grouper fishery following the introduction of an ITQ program (Redstone 2007). While it is hard to say in advance what level of consolidation might result from the widespread introduction of sectors in New England, we see no reason not to expect consolidation to be swift and extensive (see Text Box 4 for what may be an extreme prediction). Consolidation under sectors can reasonably be expected to be greater than under an ITQ program because the group nature of sectors allows, even encourages, pooling of catch onto fewer vessels to a greater degree than under an ITQ program.

Of course, consolidation is already occurring and will continue to occur, with or without sectors. For instance, it is well known that one member of industry currently owns in excess of 20 restricted groundfish vessel permits, and this has occurred without sectors. Independently of sectors or any other Council action, depressed stocks and once-again rising diesel fuel prices are powerful forces leading to a restructuring of the fleet. We think it is worth speculating about the combined effect of sectors, high fuel prices, and low TACs on future consolidation and fleet structure. On one hand, within the context of the trawl fleet, we have heard talk that smaller to mid-size vessels are better able to cope with high fuel prices.

On the other hand, the initial allocation formulas being contemplated by the Council would seem to favor larger vessels (particularly those options that blend catch history with some measure of the capital investment in a vessel). The irony here is obvious if overcapacity really is the problem. It seems likely that these large vessels can only cope with continued rises in fuel prices by increasing their throughput. That is, given increasingly high input costs, they cannot operate at anything near an “efficient” level unless they increase their catch. The owners of these large vessels could opt to downsize (scrap the vessels and move to smaller vessels able to cope with smaller catches) but it seems just as likely that they will press to consolidate even further in an attempt to “stack” catch shares on fewer vessels. We have even heard talk of constructing factory trawlers to stay at sea and cut steaming costs while increasing catches. We have not heard the Council contemplate what sort of future fleet structure it might be facilitating by adopting of sectors.

If the Council is concerned about consolidation, then it should address these concerns directly to meet specific goals. There are clear examples of this in other rationalization programs such as the vessel size categories established by the North Pacific Fishery Management Council for the ITQ program in the halibut fishery off Alaska. The vessel size classes in halibut ITQ program were just one of many “bells and whistles” that were once derided as “social

**Text Box 7: A conversation with an owner of multiple vessels.**

**Q.** How extensive do you think consolidation will be under sectors?

**A.** It's going to be like clamming—you'll have six operations left in the industry.

<sup>24</sup> Knapp (2006) states that about 15% of the observed consolidation in crab vessels was attributable to a buyback program, not the IFQ/co-op program.

engineering.” But now that program is held up as the example of socially responsible ITQs precisely because of the policy decisions made to temper the inevitable consolidation unleashed by the program.

Instead, the Council focus has been on the desire to “provide a mechanism for economics to shape the fleet rather than regulations.” This is an odd statement, for shaping by economics is exactly what is happening now under the conditions of low fish stocks and rising fuel prices. This statement by the Council (curiously articulated by the Council as a goal for the initial allocation mechanism, as mentioned above) reflects a belief that sectors will be “natural.” This attitude is consistent with larger assumptions in fisheries policy (and literature) in the U.S., where catch share programs are associated with markets that are thought to be natural. Discussions of catch share programs are often imbued with the sense that they are an *alternative* to government intervention. In the context of sectors, Council members emphatically state that they do not want to engage in “social engineering” and that the Council does not want to “micromanage” sectors. This language surfaces in discussions of placing restrictions on consolidation and related attempts to ensure fleet diversity.

But fisheries management *is* social engineering. The purpose of the Council is to engage in social engineering — the Council has been assigned that task by Congress. For example, National Standard 8 of the Magnuson-Stevens Act compels the Council to consider management impacts on fishing communities. And sectors are no exception to this “rule” of social engineering being the norm. In creating sectors, the Council is stepping in to an existing regulatory landscape and changing it, selecting winners through initial allocation qualifying schemes and deciding whether to address key implementation features via private industry or government oversight.

Regarding the Council’s desire to “create a management system so that fleet capacity will be commensurate with the resource status,” the idea appears to be that there is a “correct” fleet size for a given level of stock. In response, it must be recognized that this involves forever-moving targets, the resource and the catching power of the fleet are never constant. Moreover, this belief places too much emphasis on effort and too little on mortality: given the level of technology employed, and the relevant stock levels, overfishing can occur with 20 boats or 200 boats, if there is no effective way to contain fishing mortality. Of course with sectors, there will be a cap on fishing mortality, the TACs, but again, given a sufficiently advanced level of technology, TACs can be taken by 20, 200, or 2000 vessels (particularly with relatively low TACs). The determination of the “right” fleet size is an exercise in social engineering.

#### d) Mitigating Community Impacts

To a large degree, the Council’s concerns over the possibility of what some might consider extreme consolidation are expressed in terms of concerns for impacts on traditional fishing communities and ways of life. As noted above, the Council has expressed an interest in minimizing adverse impacts on communities (see Goal 4). In addition to the formal goal statement to this effect, we have encountered frequent expressions of concern by both managers and industry for communities in the groundfish fishery as well as widespread hope among these groups that sectors will help address these concerns. However, few details of sector management focus on place.



While many of the sectors are informally associated with places (for example many of the existing and proposed sectors use place names in the name of the sector), there is nothing in sector management as currently envisioned that prevents a sector from moving to a new location. Regardless of how they are named, sectors are simply placeless legal corporations. Sectors are thus “virtual” communities — clubs of permit holders that may or may not be associated with any particular place-based community. Since sectors receive the allocations, the sector management — not individual members — controls where a sector is based. In the absence of any externally imposed formal requirement, a sector’s location (if it even has one) is a private business decision of the kind that the Council has stated it prefers not to “micromanage.”

The Council is also silent on the concept of so-called community banks (permit banks). In general terms, the concept involves “communities” purchasing and holding permits for subsequent lease to fishers. This kind of approach responds to the widespread concern that consolidation could leave entire communities without access to fisheries that have long been part of their social and economic fabric. There is a very thoughtful document on the subject of community banking in the context of New England groundfish (see Holland 2007), but we know of no discussion or acknowledgment of this document in the Council arena. As currently structured, community banks are private holding companies and we see no explicit tie between these private companies and the communities presumably of interest to the Council. The entire subject of “community” warrants closer attention and we present a more detailed discussion in Section V (see “Where is the Community?”).

A repeated theme in our industry interviews was that the geography of the groundfish fleet has been consolidating as much as the sheer count of vessels. Individuals are leaving the fishery, selling their permits to ever fewer permit “collectors” based in an ever-smaller number of communities. Sectors are thought to facilitate this process because of the attractiveness of pooling catch onto fewer vessels, an option enabled in sectors. Among our industry respondents, the most popularly held view was that the future consisted of three ports — Gloucester, New Bedford, and Point Judith. However one key individual suggested that even Gloucester was ultimately at risk.

We are not endorsing any of these speculations but rather emphasize that sectors will not provide protection to communities unless such protection is built in. Rather than providing protection to communities, as some proponents seem to believe, sectors may disadvantage many communities. This is a predictable result of combining the potential of sectors to accelerate consolidation with a laissez-faire approach to placement of conditions on sectors in order to protect communities (in this case place-specific conditions).

Finally, we think there is an additional “community” dimension to sectors that has not received the attention it warrants and this concerns the larger community of the Commonwealth itself. It is not clear to us what happens in state waters under sectors. As a result, it is not clear that the Commonwealth is not inadvertently ceding an important state interest to the Council that in turn is ceding a tremendous amount over to the private sectors. Hypothetically, it is conceivable that an entire TAC could be allocated to sectors (if no one opted to fish in the

common pool) because there is no limit to how much of the TAC can be assigned to sectors or indeed to a single sector:

There will be no limit on the share of a stock's TAC that can be allocated to a sector [A16DEIS:43].

Under these terms, the state waters fishery could cease to exist by definition. It appears that the Commonwealth either needs to apply for its own sector or a dedicated portion of the overall TACs (or both) in order to fully protect the interests of *all* its citizens as opposed to those who are or will be enrolled in sectors. We understand that there is some informal arrangement to reserve part of the TAC for state waters, but surely if selected individuals in the present generation are having their share in groundfish formalized, the Commonwealth should be acting to formalize its share.

*e) Devolution versus Abdication*

The Council's specific goal statements for sectors speak of an interest in simplifying management and giving industry greater control. We have remarked above on the pronounced emphasis on devolution of authority (from the Council to industry) that pervades much of the conversation about sectors. The extent of the Council's planned devolution forebodes one of the most critical aspects of the shift to sectors. By devolution, we mean the Council's expressed interest in "simplifying" management by turning many key management functions and decisions over to the sectors. There is a companion emphasis on deregulation.

The emphasis on sectors as a path to devolution is evident in comments such as the following, from the draft Amendment 16:

One of the major benefits of self selecting sectors is that they provide incentives to self-govern, therefore reducing the need for Council-mandated measures [A16DEIS 2008:40].

In addition, a marked reluctance to provide oversight of sectors once they are up and running is evident and frequently heard at Council meetings in phrases such as: "we don't want to micromanage," "we don't want to get into social engineering," and "that is a private business matter." These expressions are evidence of the emphasis on deregulation. The Council seems so eager to hand over its traditional job as guardian of a public resources to privately run sectors, that it is worth asking: Does the current approach to sectors represent devolution of authority or the Council's abdication of its Congressionally assigned duties?

As noted in our review of the theory behind sectors (see Section II), the emphasis on devolution in the Council is consistent with a larger trend in fisheries policy towards devolution of authority (see, e.g., Pinto da Silva and Kitts 2006 for an example focused on New England). In the international arena, devolution has been embraced most noticeably in the principle of "subsidiarity" which essentially says that decisions should be made at the most local level practicable (see, e.g., Bavinck and Jentoft 2008). Devolution is also a long-standing theme or even ideal in American political culture. From the founding forward, our nation has been engaged in a giant experiment in devolution known as federalism. However, the extent of the devolution

rhetoric in fisheries goes beyond the balanced approach to devolution adopted by the framers of the Constitution and by Congress when it established the regional fishery management council system in the Magnuson-Stevens Act.

We believe that the emphasis on devolution deflects attention from important public policy issues such as consolidation and impacts on communities, and that there are reasons for concern over devolution on both biological conservation and social grounds. Our unease here is not with the concept of devolution, but the extent of its application.

To begin, we challenge the conceptual link that some proponents implicitly make between devolution and conservation. Although we do not reject the conservation potential of sectors (especially given the fact that they represent a vehicle for introduction of TACs), what actual evidence supports the idea that giving more management power to industry will inspire them to make the sacrifices necessary to reverse the overfishing trends of the last thirty years? This is bound to be a controversial question, but the condition of many key fish stocks suggests that it is time to try to have a conversation about some inconvenient truths of groundfish management in the region.

To examine the argument that devolution of power leads to sound biological management it is instructive to ask who has been in charge of groundfish management in New England the last thirty years? Ostensibly, the answer is the Council, and since the Council is mostly made up of industry members, it can be argued that industry *has been* in charge these thirty years – and that devolving more power to industry would hardly improve the chances of successful management.

Other studies argue that the commercial fishing industry is in charge, as it occupies a preponderance of the voting seats on the Council (Okey 2003; Eagle *et al.* 2003). Moreover, of the seventeen votes on the Council prescribed by Congress, only one is allotted to the federal government. Five votes *do* belong to the fishery agencies of the member states, but this does not alter the preponderance of votes held by industry and we suspect that often the state representatives are under considerable pressure from industry (more so than from other constituents). In addition, while it is true that the Secretary of Commerce has final authority to accept or reject Council plans, it is more relevant that, in practice, there are few instances of the Secretary using this power in New England.

Nonetheless, it is only fair to consider differing perspectives on what the Council represents. Supporters of the devolution/deregulation approach emphasize the fact that Congress gave the Secretary of Commerce final authority to approve or disapprove Council plans. This design feature permits an argument that the National Marine Fisheries Service (NMFS) is in control and that the regional council system is in fact an exercise in top-down management, not co-management (Pinto da Silva and Kitts 2006). Proponents of this argument counter that the Secretary does not, in practice, *have* to overrule the Council, because NMFS signals impending disapproval *before* Council approval, thus steering the process away from outcomes that the Secretary would not favor (Pinto da Silva and Kitts (2006) present a version of this critique).

In our view, the Council is functioning as the experiment in co-management that Congress clearly intended it to be (see, Young 1982). There *is* room to be concerned about the *representativeness* of the Council system (e.g., does it represent all of industry, does it represent consumers, does it represent the general citizenry, etc.) but it seems clear that management of groundfish has been controlled for the most part by industry since the inception of the council



system and that this conclusion presents a serious challenge to the belief that *more* industry control will produce better results for the stocks. Proponents of further devolution and deregulation are thus in the position of having to argue that management has failed not because industry has not been in control but that they have not been in *total* control.

While conceivably it may be argued that a shift of the power balance in one direction is as or more likely to improve management as a shift in the other direction, we see no convincing evidence or logic to support the claim that giving industry more control will improve the status of fish stocks. Supposing the charge of the proponents of further devolution is true—that conservation has not been achieved because NMFS is thwarting the wishes of the industry-controlled Council—it would be necessary to cite examples where NMFS has struck down *more* conservative plans from industry in favor of laxer plans that resulted in overfishing. We know of no such evidence.

Given what we feel is a dubious link between devolution and conservation of fish stocks, the most critical aspect of the conversation about sectors is the sheer extent of the devolution envisioned. In our view, the Council is taking a tremendous gamble on the idea that conservation is somehow a matter of management structure—and more specifically, that giving industry more power will lead to greater, not less, stewardship and thus, most importantly, conservation.

This is dangerous for two reasons. First, devolution may just as easily lead to *less* conservation, for what seems like an obvious reason: some fishers may see it to their short-term advantage to over-exploit the resource. Second, in placing its bets on devolution as a route to conservation, the Council is bypassing other measures that might have a more assured chance of cultivating both effective conservation and a stewardship mentality.

We have commented earlier on the faith in the idea that ownership-promotes-stewardship. In the extreme, this belief is nothing short of reckless. It seems irresponsible for managers charged by Congress with the responsibility of managing and conserving our public fishery resources to assign these problems to industry and then effectively look the other way buoyed only by the hope that private industry can and will care for the resource.

The view from the social perspective on fishery management points to additional problems inherent in devolution. Handing off difficult social issues (like allocations) to what are essentially locally controlled private clubs does not take any of the gravity out of the decisions—it merely shifts the decision point to a lower level. One of the time-tested lessons of political science is that it is the role of *higher* levels of authority to protect the rights of minorities. In all the Council's talk about devolution, we have seen no consideration of the likelihood of domination by local elites, yet the club-like nature of sectors is ripe for just such domination.

Nor has there been any discussion of what happens in the future in terms of how the sectors will operate in regards to ensuring fairness and equity in operations. For example, not only internal allocations, but entry to and exit from sectors as well, will be controlled by the handful of industry members in charge of each sector. Domination by a select and powerful few could become a serious impediment to individual fishers' attainment of benefits from the sector system. Unlike an ITQ system, where fishers may purchase the ability to fish what and how they want on a transparent and open market, under sectors they will be restricted not only by the rules of the game but by the whims of other fishers who have acquired, through sector membership or leadership, the power to open and close doors to remaining fishers.

No matter how wise, compassionate and fair the particular individuals controlling the present administration of sectors are, there is no guarantee that their successors will be so. The Council has not designed mechanisms to ensure fairness and transparency into the future. At bottom, the devolution embedded in current plans for sectors, which involve little to no oversight, could result in anti-democratic structures. Viewed from this perspective, the Council's expressed disdain for "social engineering" is disturbingly ironic. Whatever its faults may be, the present Council system is based on an open democratic process, open markets, and statutory protections subject to judicial review. In contrast, the Council is proposing to replace this system with a largely non-transparent reliance on private business arrangements. Surely, this is a substantial exercise in social engineering.

Earlier, we noted that pushing difficult decisions down to the local level does not in itself resolve those issues. We think it is worth considering the position that sector management is going to be in relative to the enforcement and monitoring needs for *successful* conservation under sectors. Sector managers will in a sense be local cops and small town policing presents particular challenges in terms of potentially awkward if not explosive social dynamics. The social environment can be particularly intense if there is a culture of "sticking it to the man" as the man is now local, a neighbor, and, often, a relative. We do not know if this particular culture exists in the context of New England groundfish but we do know that past experiences with trying to enforce groundfish catch limits were volatile (see, e.g., Miller and von Maanen, 1979).

Finally, we think it is important to note that the extreme nature of the talk of devolution of authority to sectors contains an implicit challenge to the future of the Council. *If* the Council does not wish to undertake the full responsibilities assigned to it by Congress but instead prefers to hand these off to industry, then why should the Council continue to exist at all?

## V. Discussion: Confusion, Omission and Oversell

We are struck by the sense of oversell associated with the advocacy for sectors and how this oversell is occurring in an atmosphere of conceptual confusion and omission. In this section of our report, we want to walk through some of the areas where we think more careful consideration of sectors (or aspects of the debate over sectors) is called for. We begin with some observations on characteristics of sectors as envisioned under Amendment 16 that have important implications. We then turn to some of what we regard as the more egregious examples of oversell—in all cases, our primary concern is that good public policy formulation depends on accurate information, not on what amount to advertising and public relations campaigns.

### *a) Sectors as Policy Goal vs. Policy Tool*

A visit to the Moore Foundation's Marine Conservation Initiative web-page (<http://www.moore.org/marine-conservation.aspx>) indicates that over the course of a year, the Foundation gave approximately \$3 million to groups in New England active in the development of sectors. Notably, the focus of these grants is on a management *tool* not a management *outcome*—as the Foundation's summary of the purpose of the grant to Environmental Defense Fund states: "This grant supports implementation of Dedicated Access Privileges (DAPs, also known as "catch shares") in the entire groundfish fishery. . . Environmental Defense will help to make DAPs the default management mechanism for New England fisheries."<sup>25</sup> The focus is clearly on a tool (catch shares) as a policy goal in itself. Subsequently, the funding recipients (EDF) refined that focus onto a single form of catch shares, sectors. Walker Foundation funding to CCCHFA is similarly focused on "ensuring catch share implementation in New England's groundfish fishery."<sup>26</sup> We think this focus on sectors as a goal unto themselves has clearly spilled over into the larger management process itself.

### *b) More about the Market for Permits*

It is interesting to contemplate the future market for the boat/permit/potential sector contribution bundles that will result from Amendment 16. Managers have told us that in practice the catch histories are likely to be forgotten and an amount (stated in either pounds or a percentage of the TAC) will simply be denoted on each permit, whether or not this permit has joined a sector yet. It seems certain that these permits will be bought and sold based upon the perceived value of these "attachments," not only inside of sectors but in the common pool fishery as well, in anticipation of what they will be worth if and when they join a sector. But if sectors are not LAPPs by virtue of the fact that there is no allocation to an individual, it is hard to envision exactly how permits can be issued with amounts attached to them and then bought and sold into the future based on the value of this amount.

The National Marine Fisheries Service has produced a Q&A sheet on sectors and one entry on the sheet notes: "Unlike an IFQ fishery, there is no individual vessel allocation made by NMFS, nor is there a permanent allocation that could be fished *or transferred* [NMFS 2008,

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<sup>25</sup> [www.moore.org/init-grants-awarded.aspx?init=112](http://www.moore.org/init-grants-awarded.aspx?init=112)

<sup>26</sup> <http://Walker-Foundation.org/net/org/project.aspx?projectid=54847&p=54846&s=0.0.69.5316>



emphasis added].” Since the amounts attached to permits are not allocations, it is simply the *specter* of a “potential sector contribution” that will be denoted on the permit and will undoubtedly acquire a market value, all without being a true allocation. Whatever the legal technicalities involved, it seems certain that the future market will regard these denoted amounts as allocations and that these “allocations” will come to be regarded as shadow ITQs or even (as some industry members have explicitly stated and some managers have hinted) as the basis for eventual ITQs.

There has been little discussion of how cumbersome this process could become as future participants search through the market for permits with the desired clump of attached “potential contributions.” Permits will feature “clumps” of potential sector contributions because the fishery is a multispecies fishery. There is no flexibility, no easy way to adjust one’s holdings (as there would be if there was a market for species specific catch shares) because these amounts are fixed to each permit, frozen forevermore in the clump first established by the initial allocation scheme (and associated qualifying years) chosen by the Council to establish these “non-allocations.”

In a way, this cumbersomeness provides a self-fulfilling rationale for sectors. Picture an entrant into the fishery who has managed to raise the funds to purchase a boat and a permit with a clump of “potential sector contributions.” Inevitably, this clump of various amounts for various species will not contain the right ratio to mirror the actual species composition of the new fisher’s catch. There are many reasons for the likelihood of a mismatch between the ratio of species amounts on the permit and the actual catch, among them being that the qualifying catch history occurred under a different set of rules (governing retention limits) than will presumably exist into the future. So, the new fisher will need some way of obtaining access to more of a particular species. But it is hard to obtain more on the open market because the market is only for complete bundles of permits, associated vessels, and attached potential sector contribution amounts; if the new fisher purchases an additional license to acquire the catch history he desires for some particular species, he will also acquire a whole additional clump along with it, making the desired species ratio virtually unattainable. Sectors, however, can adjust and transfer amounts freely and with divisibility; *only* by joining a sector can our hypothetical new fisher mean unclump his catch histories and mix and match until he has the desired species ratio. It would seem that sectors thus have a certain amount of leverage over fishers and the decisions to admit new participants to a sector could turn on the attractiveness of the clump of potential sector contributions (possessed by an aspiring entrant) to a particular sector. In turn, the market value of clumped sector contributions will surely reflect changing strategic calculations by sectors managers.

But why maintain the existence of permits tied to vessels once the sector program is implemented? While it may seem natural to continue with the restricted entry permits, from a conservation perspective they are not completely necessary under a catch share regime. Once the fishery is operating under the output control regime, continuation of the licensing input control is superfluous from the standpoint of protecting the stocks. Unless the purpose is simply to maintain the market value of the previous licenses, it is hard to understand the rationale for maintaining the obsolete licensing scheme instead of phasing out the licenses and just operating the sectors on the basis of potential sector contributions (or indeed explicit catch shares).

c) How Voluntary are Sectors?

Sectors are uniformly referred to as voluntary. Sectors are considered voluntary because no one is forced to participate; fishers choose to join a sector based on their own assessment of the potential benefits from joining. Thus, sectors are referred to in the Council arena as being “self-selecting.” However, as shown in Section III, there are reasons to question just how voluntary sectors are or will be for some in the fishing industry. How voluntary is the decision to join sectors when the only alternative is to join what is now being called the “cesspool” (*i.e.*, the common pool, see, Gaines 2009b)? An analogy may help to see why we question the voluntary label. Suppose the only items at the grocery store were sand or canned beans. Would we pronounce that people were happily choosing beans as if it were an indication of their true thoughts regarding beans?

It is clear that there are people who have signed up for sectors who are not happy volunteers. It is also clear from our conversations with industry that many are also relatively uninformed volunteers (*i.e.*, uninformed about sectors). What would make a sector program truly voluntary in our minds is if everyone had an individual allocation and *then* they could choose to form sectors *if* they so desired. If the Council thought there were advantages to the sector approach, they could even build in incentives to join sectors, but this is different than the all-or-nothing choice currently being presented to industry.

d) A Question of Money and Influence

In Section III, we noted how the people we interviewed reported having a sense of an external push for sectors. The level of funding from private foundations and environmental groups devoted to ensuring that sectors are implemented in New England is substantial. For example, the funding from a single foundation in one year devoted to the pursuit of sectors was approximately equal to the Council’s annual operating budget. As discussed above, the focus of this funding is on sectors as a policy *goal* rather than a tool. We have several concerns with private foundations promoting sectors. First, we believe that while the environment (the fish stocks) may certainly benefit from the implementation of a TAC and sectors, there will be an unequal distribution of costs and benefits from both a social and economic perspective. The private groups most heavily involved in advocating for sectors have shown little interest in this aspect of sectors as currently envisioned.

Second, money is being given to promote a *specific* vision of catch shares that, according to the language used by the foundations and groups, involves privatizing public resources with no return to the public. The amount of money involved can reasonably raise concerns about swamping the process with one particular view. Much of the public is trusting of the environmental lobby, and we understand that all private groups have the right to lobby for objectives they deem important. However, we feel that the general public is likely unaware of both the ideology and distributional consequences associated with sectors as currently designed.

The announcement of a new pass-through arrangement whereby NOAA is “working with the National Fish and Wildlife Foundation to provide additional resources to the councils to help break through any financial bottlenecks you experience in moving ‘catch shares’ forward [Gaines 2009c]” only exacerbates our concerns. We think there are time-honored reasons to be concerned about the influence of private funds on the performance of the public duties of government.

When there are a multitude of interests and potentially affected parties involved and the subject of the funding is fundamentally a political allocation (and that is what fishery management allocations are), we think this is a very slippery slope indeed regardless of how benevolent the intentions of the current suite of potential financial donors might be. Obviously, there *are* ways to fashion effective private/public partnerships but particular care must be taken when political (and possibly permanent) allocations are at stake. We also worry about the potential for management agencies to be inadvertently compromised if (1) key components of their programs currently benefit from private funding that has no involvement with resource allocation issues and then (2) the same donors direct funds to contentious allocation issues.

*e) The Curious Case of the Costello (et al.) Paper*

One of the most influential factors in terms of both the national enthusiasm for catch shares and the regional push for sectors in New England is the paper by Costello *et al.* (2008) mentioned earlier in Section II. The confusion over ownership, stewardship, and conservation that afflicts contemporary discussions of marine conservation is reflected in, and has been exacerbated by, this paper (recall it has been billed as providing scientific “proof that privati[z]ing fishing stocks can avert a disaster [Economist 2008]”). Clearly, this paper is the referent in the new NOAA administrator’s comments to the Council about “compelling global evidence” regarding catch shares<sup>27</sup> and this paper (along with the more sensational claims for “privatization” that accompanied it) are prominently featured in the EDF campaign for catch shares/sectors.<sup>28</sup>

We think the Costello paper is seriously flawed, in ways anybody interested in catch shares should become familiar with. In essence, the Costello paper is two papers in one. The first paper is about the observed effects (or performance) of catch share programs around the world. The second paper is about a *causal* explanation for the results observed in the first paper. We think both “papers” have serious flaws that have not been widely commented upon. We begin with the first paper. Clearly, catch share systems work. However this conclusion is not new, Costello *et al.* merely provided more rigorous support (grounded in a statistical analysis) for a conclusion reached nearly a decade earlier in a similarly broad analysis that is well-known to proponents of catch shares in the U.S.:

The scientific evidence is quite clear on these achievements. The Organization for Economic Cooperation and Development (OECD 1997) reviewed management experiences in more than 100 fisheries in 24 member countries. This is the only study I know of that systematically compares [catch shares] with more traditional approaches to fisheries management. The evidence shows that [catch shares] are an effective means of controlling exploitation, of mitigating the race-to-fish and most of its attendant effects, of generating resource rent and increased profits, and of reducing the number of participants in a fishery [Sutinen 2001:4].

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<sup>27</sup> Tape of NEFMC meeting, April 8, 2006, “Audio Track: Dr. Jane Lubchenco, NOAA Administrator” available online at: [www.nefmc.org/actions/index.html](http://www.nefmc.org/actions/index.html)

<sup>28</sup> See, [www.edf.org/article.cfm?contentID=8446](http://www.edf.org/article.cfm?contentID=8446).



We agree, catch shares work. But the rather, by now, mundane conclusion that dividing a TAC into subsequently assigned shares provides benefits is itself less potent than it could be because of a significant flaw in the methodology behind the Costello paper. In the language of science, the authors did not “control” for the presence of a TAC. This means that they cannot separate out the beneficial effects of the TAC from the beneficial effects of subdividing that TAC into individual assignments. The severity of the confusion is on display in this quote from the lead author following publication of the paper:

‘Under open access, you have a free-for-all race-to-fish, which ultimately leads to collapse,’ says lead author Christopher Costello, an economist at the Bren School of Environmental Science and Management at the University of California, Santa Barbara. ‘But when you allocate shares of the catch, then there is an incentive to protect the stock—which reduces collapse. We saw this across the globe. It’s human nature.’  
[\[http://esciencenews.com/articles/2008/09/18/new.study.offers.solution.global.fisheries.collapse\]](http://esciencenews.com/articles/2008/09/18/new.study.offers.solution.global.fisheries.collapse)

Assuming that the lead author speaks for the entire team, the problem here is we have no way of knowing what the authors mean by “open access.” Do they mean truly unmanaged, un-owned fishery resources in the sense of the legal concept *res nullius*? Or do they mean “common property” that is left unregulated by an oblivious management body? Or do they mean “common property” that features a TAC? If the latter, surely some management bodies with a proud record of sustainable management under TACs (*e.g.*, both the North Pacific Fishery Management Council and the International Pacific Halibut Commission had long records of sustainable TAC management *prior* to augmenting TACs with catch shares) will surely be surprised by the assertion of inevitable collapse. Unfortunately, since the authors did not distinguish between a fishery with a TAC and a fishery with a TAC *plus* catch shares, we (and they) have no way of sorting out the additional benefit provided by the introduction of catch shares. This is a serious shortcoming of the Costello study and one that is lamentably not commented on in the subsequent publicity afforded the study.

The authors’ interpretation of the data is further weakened because they mistake a correlation for a cause. That is, Costello *et al.* attributed any post-implementation improvement in stock status to the catch share program. But by this logic, any downturn in stock status would be evidence of “failure” of catch shares. Are we thus to conclude that the IFQ program in the halibut fishery off Alaska has recently failed because of the substantial reductions in TACs in the past few years?<sup>29</sup> Similarly, when Iceland cut the cod TAC by 30% in 2007,<sup>30</sup> is that to be interpreted as a sign the Icelandic ITQ program was failing? Or, to name one final example, when the TAC for pollock in the Bering Sea was recently reduced to an all-time low for the domestic fishery,<sup>31</sup> does this mean that the cooperatives in that fishery have also failed? By the correlation logic employed in the Costello *et al.* paper, the answer to all these questions is

<sup>29</sup> The halibut reductions are most sizable in management area 2C where the TAC was reduced 28% in 2008 and a further 19% for the current 2009 season. See, <http://community.adn.com/adn/node/134949> ; and <http://community.adn.com/adn/node/136750>

<sup>30</sup> <http://news.bbc.co.uk/2/hi/science/nature/6992938.stm>

<sup>31</sup> <http://community.adn.com/adn/node/135590>

presumably “yes” but, we think it is far more likely that what is being observed are natural fluctuations in fish stock populations.

At least the “first” Costello paper has data upon which the correlation-as-causality error is committed. The “second” Costello paper introduces a causal model, an explanation for the post-catch share stock conditions they observed, for which they have no data whatsoever. We are referring to the private property/ownership-promotes-stewardship explanation of catch shares that dominates the economic literature on fisheries and is prominently featured in the Costello paper (see particularly, Costello *et al.* 2008:1679 for emphasis on the link between “secure rights” and “stewardship incentives”). The lead author provided further explanation of their causal explanation during the PR blitz accompanying the paper’s release:

‘The difference is comparable to renting an apartment versus the house you own,’ says Costello. “if you own something, you take care of it—you protect your investment or else it loses value. But there’s no incentive for stewardship when you don’t own the rights to it.’

[<http://esciencenews.com/articles/2008/09/18/new.study.offers.solution.global.fisheries.collapse>]

But notice here how we are simply presented with an assertion, not a research question: if you own something, you take care of it. This assertion could be rendered into a testable hypothesis (or several) for which data could be collected, but Costello *et al.* did not do that, all they tested was what they clearly articulated they were going to test: “We tested the hypothetical causal link between the global assignment of catch shares and fisheries sustainability [Costello *et al.* 2008:1679].” This hypothesis says nothing at all about “ownership” and presumed ties to “stewardship.”

Costello *et al.* simply *assumed* the link between ownership and stewardship without testing. They took no account of the prevailing legal status of the ITQ programs for which they had performance data. Under U.S. law (i.e., the Magnuson-Stevens Act), rights are not involved in catch share systems (see the related discussion below under “*Is this Privatization?*”). Beyond this specific definition in law, the success of catch share programs does not rest on the exercise of enforceable claims (the essence of a right, see, Macinko and Bromley 2002, 2004). The success of catch share programs, as discussed above, lies simply in the fact that a TAC has been established (and credibly enforced) and then each vessel fishing pursues a subsequently assigned share of the TAC. Rights are not involved, but rationality is—the assignment of catch transforms fishing from a competitive exercise focused on maximizing catch (i.e., gross revenue) into a rational planning exercise focused on maximizing net revenue for a given (assigned) catch.

When it comes to statements of a *causal* nature (in other words why stocks might have improved following introduction of ITQs) the authors simply have no data upon which to base conclusions beyond the just-mentioned jumbled presence of a TAC+ITQ package. That is, they have no evidence to support statements about whether it was a sense of “ownership” that led to the stock changes they observed or whether privatization is necessary to obtain beneficial results. There is no data, for example, from standard social science-style survey work asking the participants whether they felt more like taking care of the resource after they had ITQs. There is not even any research to support a claim that ITQ holders felt that they “owned” the resource.

In fact, there is no data whatsoever to suggest that *any* “privatization” is necessary at all.

Costello *et al.* made no distinction between shares that were “owned” and shares that were leased. This is an important point because leasing permeates many catch share programs worldwide. Given the prevalence of leasing in “successful” programs, we seriously doubt whether there is anything in the data Costello *et al.* relied upon that would suggest that such leasing imperils the conservation gains offered by catch share programs. And it is unlikely that there is anything in the data to suggest that private lessors are somehow necessary instead of public lessors to produce the results they observed.

In summary, the Costello *et al.* paper has been oversold in ways that unfortunately truncate the discussion of options for fisheries policy. There is no basis in the data for jumping from the quite reasonable position that catch shares work to the completely ideologically-based position that catch shares work because people feel they own the resource and thus have a long term interest in preserving the resource – in other words, because ownership promotes stewardship.

#### f) Bad for Banks, Good for Fish?

In the comparison between apartment dwellers and home owners presented above, we see again the reliance on the presumed natural tendency to protect investments, a presumption that pervades the causal explanations of why catch shares work and that leads to the belief that catch shares must be thought of as private property rights. Recent events in the larger world outside of the fisheries literature have dramatically highlighted the substitution of ideology for analysis that is involved here. Recall the quote presented earlier that epitomized the standard causal explanation of catch shares:

[S]hares in a collapsed fishery are worth as little as shares in a collapsed bank. But shares in a thriving fishery command high prices and represent real wealth for their owners. Suddenly, fishermen have an incentive to preserve a fishery for the future, as preservation will be reflected in a higher value of which they ‘own’ a share. Each fisherman has an incentive to lobby for the optimal TAC [Heal and Schlenker 2008:1045].

About the time the paper containing this statement was being published in *Nature*, all too many banks did indeed collapse and many people (even entire nations such as Iceland) learned painful lessons about the limitations of the presumed linkage between self-interest and sustainability and the difference between ideology and reality. The irony here is that just as former Federal Reserve Chairman Alan Greenspan was telling Congress that he had found a “flaw” in his ideological belief in the self-sustaining powers of self-interest—“Those of us who have looked to the self-interest of lending institutions to protect shareholders’ equity, myself included, are in a state of shocked disbelief [as quoted in Andrews 2008]”—the self-interest explanation of catch shares was being pushed harder than ever.

Alarmingly, we see no signs that the proponents of the ownership-promotes-stewardship explanation of catch shares are aware that outside of fisheries, as the world’s financial systems are teetering, the reliance on self-interest as an adequate form of regulation for long-term sustainability is being thoroughly questioned even by former stalwart champions of this belief: “The movement to deregulate the financial industry went too far by exaggerating the resilience—the self-healing powers—of laissez-faire capitalism [Posner 2009, as quoted in Solow 2009:4].” We think the parallels are clear. The issue is one of personal discount rates on the part of



entrepreneurs be they engaged in finance or fishing. As we have discussed, the quest for short-term profits can overrun concerns for long-term sustainability. Given a high preference for profits now rather than later, it can always be “rational” to effectively liquidate the very basis of those profits.

Just as personal value differences can lead to substantially different assessments of how much to discount the future, different values can produce dramatically different interpretations of what is “optimal.” Thus the statement suggesting that under catch shares “[e]ach fisherman has an incentive to lobby for the optimal TAC [Heal and Schlenker 2008:1045]” brings to the fore the question of optimal for whom? We suggest that the events known as the Framework 42 lawsuit and the pursuit of a “mixed stock exception” provide vivid evidence that there is no reason to suggest that industry will have the same concept of the “optimal” TAC as society at large. Making industry “owners” and talk of property rights may only exacerbate this disagreement.

#### *g) How Model is the Hook Model?*

It is no exaggeration to say that the two sectors associated with the Cape Cod Commercial Hook Fishermen’s Association (CCCHFA)<sup>32</sup> have become the poster child for the sector concept, both regionally and nationwide (for evidence of the influential role of the CCCHFA sectors, see, *e.g.*, Fahn 2005; Pinto da Silva and Kitts 2006; Petruny-Parker 2007, 2008). Some industry respondents *did* emphasize reasons that the CCCHFA may be unique---they are based on fixed gear fisheries and originally involved an allocation for only a single species in contrast to the multi-species and predominantly trawl gear groundfish fisheries involved in the current sector discussions--- but this uniqueness, and several issues within the CCCHFA lead us to question whether “The Hook” should serve as the benchmark for sectors and groundfish management.

The CCCHFA sectors are represented as exemplars in at least three important dimensions. The CCCHFA sectors are said to show the promise and ability of the sector concept to accommodate strict TACs, are claimed to preserve traditional fishing communities,<sup>33</sup> and to provide “a working model of community management for others to follow [Leal *et al.* 2008:12].” But we caution that the CCCHFA sectors, in our view, provide at best an incomplete test of the sector concept on both of these dimensions for reasons that are likely to be important when planning for wider application of sectors in the groundfish fishery.

First, it is our understanding that the CCCHFA sectors have never reached their assigned TACs and in fact routinely fall far short. Thus, experience with the CCCHFA sectors has not

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<sup>32</sup> We say “associated” because we are aware of the fact that on occasion, representatives of CCCHFA (or the sectors) take pains to distinguish between the two sectors and the CCCHFA. We are also aware that at other times, these same representatives blur the distinction and speak on behalf of the sectors (see, *e.g.*, Nickerson 2009). We admittedly ignore the distinction (such as it is), noting that all of the entities/subsidiaries associated with CCCHFA (included the community bank) share a central office location, a central phone, and are distinguished in ways that a corporate lawyer could understand but we cannot.

<sup>33</sup> The CCCHFA website states that the sectors are “protecting a resource, a tradition, and a way of life.” See, <http://www.ccchfa.org>.

provided a test of the enforcement system necessary for successful TAC management via sectors. Neither NMFS nor the sectors have had to face a situation that tests the ability of the NMFS/sector partnership (inherent in the sector concept) to respond to the need to promptly stop fishing once the TAC is reached or to deal with overages should they occur. It is also our understanding that the contractual documents regarding internal “policing” of catches are far more vague for the CCCHFA sectors than, for example, equivalent contracts for the pollock cooperatives fishing off Alaska. We stress that this does not mean the sector concept will not work, but that sectors are untested in this most important and fundamental aspect of fishery management based on TACs.

Second, the CCCHFA experiences are ambiguous in terms of tempering the consolidation expected from catch share programs, particularly ITQs. The CCCHFA has struggled to maintain active participation levels in one of their sectors. Out of dozens of original enrollees, only a handful of boat owners are now fishing in the “hook” sector. While the exact number fishing full time may vary,<sup>34</sup> and while the reasons for the low participation rate seem to have more to do with the sheer inaccessibility of cod to the small boat fleet than consolidation *per se*, the fact remains that the participation level is very low and it is hard to see how this can provide strong comfort that sectors will succeed at limiting consolidation and “saving” communities. The CCCHFA experience is also tied to a very specific fleet and community structure that cautions against generalizing too much from the CCCHFA experience to other trials of the sector concept.

Third, we doubt the broader applicability of the CCCHFA experience in terms of the sustainability of sectors as business operations and thus of the sector concept itself. The CCCHFA enjoys a generous level of external funding—literally millions of dollars in grants from foundations and environmental groups. This level of funding and the sizable front office staff that it supports are unlikely to be repeated across all of the subsequent sectors anticipated under Amendment 16. In this sense, the CCCHFA sectors may represent a false model that cannot be replicated elsewhere. Unrealistic initial hopes for the financial condition of sectors as organizations may lead to dashed hopes later.

In summary, the CCCHFA experience is unique and there is much about the CCCHFA experience that is pioneering and/or laudatory. CCCHFA were the first industry group in New England to ask for and receive a TAC. The sectors are also very involved in at-sea monitoring programs. The CCCHFA collaborates with other environmental NGOs and has established several outreach programs. But these positive accomplishments do not erase the need to be cautious about extrapolating from the CCCHFA experience. For the reasons discussed above, we question whether the CCCHFA is the proper benchmark for the sector-management concept.

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<sup>34</sup> We were present at a February 12-13, 2008 meeting of the LAPP Exploratory Workgroup of the South Atlantic Fishery Management Council when the Workgroup received a presentation from Paul Parker and Eric Hesse of CCCHFA (see, [www.safmc.net/Portals/6/SocioEcon/IFQs/Final%20LAP%20Workgroup%20Report.pdf](http://www.safmc.net/Portals/6/SocioEcon/IFQs/Final%20LAP%20Workgroup%20Report.pdf)). In the Q&A that followed, members of the Workgroup asked how many fishers were fishing full time in the hook sector and were told that there were four vessels fishing full time.

*h) Where is the Community?*

One of the most touted features of sectors is that they are community-based and offer hope for sustaining the iconic fishing communities of New England. This is in part, the hope we saw expressed above in terms of the CCCHFA sectors as a model. The CCCHFA has established a permit bank, called a fisheries trust, "to protect depleted fisheries resources, reinvigorate fishing businesses, and revitalize coastal fishing communities on Cape Cod."<sup>35</sup> While the CCCHFA trust is managed by a Cape Cod development corporation, how the community members residing in local communities and municipalities are involved is unclear. Under the Amendment 16 approach to sectors, there are *no* rules or regulations mandating a connection between sectors and communities.

We question claims that sectors go beyond community-based and assert community *management*:

The existing sectors are among only a few successful community-managed fisheries in the nation [Nickerson 2009].

The goals of sector management are to .... preserve traditional fishing communities, and *provide a working model of community management for others to follow* [Leal *et al.* 2008:12, emphasis added].

Where is *the community* in all of this? Where is the community in what amounts, first and foremost, to an *allocation* of economic opportunity<sup>36</sup> to selected *individuals*? The answer lies in the definition of "community" which proponents of sectors supply with clarity: "Participating fishermen manage their catch as a community instead of under complex and often-ineffective federal restrictions [Nickerson 2009]." According to this view, a group of boat owners is a community--- the sector *is* the community. Of course, any group of people can be labeled a community in the sense of some shared interest. But this is not what most people mean by "community" in everyday language.<sup>37</sup>

It might be useful to consider some analogous uses of the terms "community" and "community-managed"--- supposing the Forest Service were to consider gifting perpetual timber harvest rights to the public forests to selected timber companies who agreed to form a cartel, or supposing the Minerals Management Service decided to stop leasing our public offshore oil supplies and instead decided to just give permanent oil extraction privileges to groups of oil executives? Would we be talking of these plans in terms of "community-based forestry" or "community-managed oil production"?

It appears to us that the actual benefits back to the larger community, the town, from sectors seem to rest almost entirely on a "trickle down" theory. If boats owners benefit,

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<sup>35</sup> <http://www.ccchfa.org/trust/>

<sup>36</sup> Almost all fisheries management can be reduced to actions that effect allocation or conservation. All rationalization programs, be they ITQs, sectors, co-ops, community development quotas, etc. are decidedly the former (allocations of economic opportunity) though they may often be dressed up as the latter.

<sup>37</sup> Elsewhere, we have explored the contest between place-based communities and communities of interest in the context of fisheries management. As is the case with sectors in New England, the implications for real towns can be profound (see, Macinko 2007).



presumably some of this financial gain will trickle down through the rest of the community. While a sector may be beneficial to a community, they do not represent community-based fisheries management as we envision it. We are unaware of any non-fishing residents who are directly involved in the management decisions of local sectors.

Similar trickle-down arguments are made for the community benefits from ITQs but support for sectors at least partially rests on the sense that somehow sectors are inherently more community-friendly than ITQs: “[In comparison to ITQs] harvest cooperatives or sectors are often perceived to be more equitable and community-friendly [Johnston and Sutinen 2009:17].” In our view, the aversion to ITQs is so strong in some portions of both the fishing industry and the environmental community that sectors are romanticized simply because sectors appear not to be ITQs. A misunderstanding has developed. In reality, we see little difference between sectors and ITQs from the community (in the “butcher, the baker and the candlestick maker” sense of the word) perspective.

As we have noted above, sectors are *not* tied to municipalities. The holders of the permits with qualifying potential-sector-contributions are free to lease their permits, to sell them, and most of all, to move to Mazatlan, just as holders of ITQs do. Similarly, we noted earlier that the so-called “community” permit banks are private holding companies. These private holding companies are potentially as footloose as the sectors themselves. The involvement of a “local community development corporation” is perhaps promising but it is also another private corporation. The problem here is the potential distance between a private corporation and an actually place-bound community in terms of overall goals. As the National Research Council noted (in the context of the Community Development Quota Program in Alaska), “the corporation is not the community” and goal displacement can result (NRC 1999b:104-105). We do not see any direct links between local municipalities, lending institutions, and fishers. We believe a transparent, formal connection is required to generate the most equitable results. The CCCHFA effort may be pointed in this direction. We see no such similar effort associated with the other 17 proposed sectors.

We think there has been a serious misappraisal of sectors on the community front. In the analogous cooperatives in Alaska, there have been clear indications that sectors/co-operatives are preferred by the advantaged boat owners precisely because sectors/co-operatives permit *greater* exclusion of other “community” interests compared to ITQs (see, Criddle and Macinko 2000):

[T]here is a fundamental policy to think about for IFQs vs. co-ops. IFQs in future programs have a trail of people who want a piece of the pie—environmentalists, crewmembers, and communities. Co-ops do not have these restrictions in place for the needed giveaways that would occur [NPFMC 1999].

There is a close connection between consolidation (discussed earlier in Section IV) and concern for community impacts. We have seen this connection play an important role in several debates over catch share programs in Alaska and sense it is important in the New England context. The Alaska experience suggests that the environment provided by sectors is even more conducive to consolidation and leasing than under ITQs (especially compared to those ITQ programs with an owner-onboard provision---a provision that seems highly unlikely under sectors since it fundamentally goes against the sector concept). We think categorical statements suggesting that “there are fewer concerns about quota consolidation by corporations or individuals [Johnston and Sutinen 2009:17]” under cooperatives (and by extension, under

sectors) are simply misleading and are not grounded in the facts. In Alaska, it is the consolidation under cooperatives that has been considered extreme.<sup>38</sup>

This is going to be a very tricky issue to “get right.” In New England, we have seen that it is openly recognized that sectors are “primarily formed” to realize efficiencies through consolidation (AS16DEIS 2008:124), and many if not most people seem to want consolidation in New England. But not too much, or not too much in their favorite port. We do not think that simply setting the stage for sectors to form and then looking the other way is likely to produce the balance that people seem to be striving for. The group nature of sectors *could* be used to protect a community by keeping permits in the local area. This seems to be along the lines of the original strategy behind the formation of the CCCHFA sectors. It *could* happen, but we do not see strong evidence to believe it will. For those communities and individuals with a strong commitment to seeing that it does happen, we see no reason to think that this preference could not be exercised under a number of different arrangements for catch shares.

Unfortunately, all the loose talk about “community” detracts from serious consideration of an important policy question. *If* actual fisheries dependent places are important to policy-makers, we think the record of rationalization programs (of *any* form) is clear: the community impacts of rationalization programs can be quite pronounced, in some cases severe, especially for smaller more remote communities and it is hard to address these impacts after the fact. But the Council is not doing this, preferring instead to adopt a laissez-faire approach and place all decisions about consolidation, the fate of crew, and the well-being of communities in the hands of the private clubs of boat owners known as sectors. This can *only* be a successful strategy for the broader community if the interests and goals of the boat owners in the sector are exactly the same as the interests and goals of the broader community (see NRC 1999b:105 on the potential problem posed by substituting a community of interest for a community of place *if* the place is the intended beneficiary). Communities involve everyone; they are not “self-selecting” like sectors. Community-based management involves citizens (including non-fishing) who make fishery management decisions. We do not see this occurring in the sectors that are currently operating or in the management plans of future sectors.

#### *i) Is this Privatization? Why Talk Matters Despite the Law*

As reviewed in Section II, theoretical support of catch shares rests squarely on the belief that private ownership promotes stewardship, that fisheries are afflicted by the lack of private property rights, and that catch shares provide these missing rights. We think this foundation is beyond debate and hardly the subject of controversy. Thus, we have been surprised to find people quite closely associated with the push for sectors that express surprise or concern that they might be establishing private property rights in the oceans. Yet there are suggestions by the advocates of sectors that no privatization is involved. For example, the Environmental Defense Fund has clearly stated that “catch shares are not a property right. Catch shares are a privilege to access a public resource subject to law and regulation [EDF n.d.:2].” But the position of Environmental Defense Fund is not that easy to pin down for in another publication there is the suggestion that catch shares are indeed property rights, just not to the fish themselves. The

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<sup>38</sup> For example, the rapid consolidation in the Bering Sea red king crab fleet in the first year of the “crab rationalization” program was a function of the cooperative structure in that program more than the IFQ component.

IFQsForFisheries partnership involving EDF, the Reason Foundation and PERC produced a policy brief that commented on:

... a misguided fear that IFQs will result in “privatization” of a public resource. This fear reflects a fundamental misunderstanding of IFQs. IFQs are at best, as in New Zealand, usufruct rights; that is, they do not convey a property right in the resource itself but in use of the resource [Leal *et al.* 2004:7].

We find these assertions puzzling and imagine that the general public must be confused as to what the proponents of catch shares really mean and understand when it comes to the question of private property rights. What comfort is it to those concerned about privatization to learn that what is being transformed into private property is not the resource itself but the *use* of the resource? The importance of the distinction is never explained and is seldom mentioned. For example, on the previous page in the brief by Leal *et al.* (2004:6) they note that “[i]n New Zealand, ... IFQs are considered property rights and not privileges.” Moreover the *long* publishing history by the principals in the IFQsForFisheries partnership is full of clear, unambiguous emphasis on “the case for property rights in U.S. fisheries” (Leal 2000) and “evolving property rights in marine fisheries” (Leal 2004). The privatization emphasis of the Costello *et al.* paper is still prominently displayed on the web-pages championing that paper.<sup>39</sup> Statements made in the specific context of advocacy for catch shares in New England (in this case in the Providence Journal) seem quite clear:

Without private-property rights to fish stocks, fishermen have little incentive to conserve, so they tend to take too many fish, jeopardizing future catches and income [Leal 2006].

We think it is an outright contradiction to advocate for sectors on the basis of ownership-promotes-stewardship and emphasis on private property rights and then assert that privatization is not intended. Moreover, this kind of opportunistic use of language can obscure what is really at stake. Contrary to the picture frequently portrayed by missing property rights diagnosis of the literature, there is already an ownership regime in place. Occasionally, this same literature openly celebrates that what is under discussion is the *replacement* of these existing property rights:

[Catch shares] are part of one of the great institutional changes of our times: the enclosure and privatization of the common resources of the ocean. These are now mostly the exclusive property of the coastal states of the world [Neher *et al.* 1989:3].

As a matter of *law* it turns out that in the U.S. there is in fact no privatization involved. Under the Magnuson-Stevens Act the legal status of catch shares is clear, catch shares are mere privileges, convey no right to the fish prior to harvest, *and* provide no *legal* basis for claims of compensation should they be revoked or modified. We note that protection via compensation is what it means to have a property right in the U.S. That is, property *is* whatever is protected

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<sup>39</sup> [www.edf.org/article.cfm?contentID=8446](http://www.edf.org/article.cfm?contentID=8446) [featuring links to Economist (2008) and Dean (2008)]



under the Fifth Amendment. But in order for the entire causal model upon which fifty years of fisheries economic theory is based, to “work,” catch shares *have* to be private property rights and so we see the proponents of catch shares continue to assert that they are indeed private property rights,<sup>40</sup> just not to the fish themselves. Even here, the legal situation is clear, there is no protected property right in the “use of the resource” either. This has recently been made dramatically clear for all manner of permits to fish in the court case of *Palmyra Pac. Seafoods, L.L.C. v. United States*.<sup>41</sup>

Given the clarity of the legal status of catch shares, one might think that the issue would die there and there would be no talk of “privatization” and the need for “property rights.” But as we all know, there is indeed such talk. And it is growing. And talk matters. As noted, reports indicate that the Obama clearly administration thinks they are privatizing fisheries (see Dean 2009). We think the NOAA Administrator’s comments are a candid reflection of the intellectual foundation supporting sectors/catch shares, a foundation based on fifty years of fisheries economics literature and the offspring of the property rights movement in western public lands debates. We question why the administration would want to embrace this language, endorse it, and advance it. We are also concerned because there appears to be a total absence of public concern over the news that we are about to privatize our public fisheries.

We wonder if the suite of downstream implications from such talk has been fully thought through. For example, we think the growing interest in ecosystem services and broader societal valuations of the oceans is likely to be impeded by the granting of a clear priority to users of one particular service out of the entire spectrum of services. Granting commercial fishers “property rights” is granting them a priority or privileged status against all other users of ocean ecosystem services. Of course, how one regards this priority status depends on one’s interests and vantage point. It is good for the entitled fishers and bad for everyone else. So for example, *if* the policy objective is to provide embattled fishers some protection against what are seen to be the unwarranted claims of environmental advocates, then one might want to grant commercial fishers rights. How much protection is provided may be an open question but the basic priority conferred is not in doubt:

[Catch shares provide] equally small protection from the *interference* of others (quota holders, marine predators and *other users* of the marine environment such as mining companies, polluters etc.) in these resources [Árnason 2000:23-24, emphasis added].

Obviously the “other users” may not feel so appreciative of such a policy choice. We can imagine for example some concern on the part of recreational fishers. And there are “other users” who cannot speak directly for their interests. Again, we think the implications are clear. Consider how one prominent proponent of rights-based fishing regards non-human elements of the marine ecosystem:

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<sup>40</sup> “*Are IFQs private property?* We contend that IFQs are property [Grafton *et al.* 2009:292].”

<sup>41</sup> 2009 U.S. App. LEXIS 7447 (Fed. Cir. Apr. 9, 2009).

[Limits were put on the fleet] so as not to interfere with the foraging of Steller's sea lions, an animal claimed to be endangered, but of no use to humans and if anything a competitor for valuable fish resources [Hannesson 2004:137].

Granting “rights” to one user in a multi-user world is taking sides, and, if not thought out, can lead to a quagmire of unintended consequences. We wonder if this is the position the administration really wants to take at this time. The experience in New Zealand (where catch shares were specifically defined as property rights) is instructive:

Currently, all competing fishing rights and legislative obligations to protect the marine environment cannot be simultaneously upheld to the extent possible and to the satisfaction of all parties. With hindsight, perhaps the recognition of particular fishing rights and protection of the marine environment could have been accomplished in ways that provided greater integration of competing rights and less social and economic upheaval in the recognition and exercise of the rights at different timeframes [Bess and Rallapudi 2007:728].

We note that in the extreme, one of the parties disadvantaged by the prioritizing of the industry is management itself. While the economic literature seems to celebrate the industry takeover of management (see, *e.g.*, Townsend *et al.* 2008), quieter voices point to the broader public interest management responsibilities that are submerged when the industry “owners” displace the public owners (Wallace and Weeber 2005).<sup>42</sup>

The lessons of the *Palmyra* case mentioned above are relevant here and cut both ways. The opinion in *Palmyra* emphasized that exclusive fishing privileges *are* fully revocable without compensation, but in so doing the opinion implicitly emphasized how much our management flexibility might be constrained if in fact there were to be a private property right in use of the resource.

We think the talk of privatization and property rights is reckless. More importantly, we wonder if all involved understand how unnecessary it is. *It is not necessary to speak of, much less grant, rights in order to attain the desired catch share solution.* For some reason, fisheries policy in the U.S. is poised on the edge of a decision that runs contrary to how we manage other public resources. These other public resources present management challenges to be sure. But we do not see calls to privatize them, to simply give them away in exchange for imposing sound harvest limits on the industries involved.

For example, forest management and park management are not without their challenges.

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<sup>42</sup> We are fully aware of the dicta in *Douglas v. Seacoast Products, Inc.*, 431 U.S. 265 (1977) regarding ownership of fish. We are also fully aware of Presidential Proclamation 5030, 3 C.F.R. 22 (1983) claiming sovereign rights over the resources of the U.S. Exclusive Economic Zone (EEZ). For a discussion, see, Macinko and Bromley (2004).

But imagine if the head of the Forest Service was quoted in *The New York Times* as saying the Service was taking steps to privatize our public forests, or if the Park Service announced it was going to permanently give away, for free, shares of Yellowstone and our other national parks to adjacent landowners. We cannot imagine that such news would be met with silence or even support. As we alluded to above, we *have* catch (harvest) shares in forestry on public lands, *without* a word about missing private property rights and we do these (timber) harvest shares in a way (royalty lease auctions) that provides a return to the current owners of the resource (the U.S. public). Only in fisheries is it assumed to be *necessary* to have the harvest shares be associated with private property rights and assertions of ownership induced stewardship.

The fact that we are talking about a public resource seems to have disappeared from the dialog over sectors and catch shares. For example, public ownership was not mentioned or recognized in the *Oceans of Abundance* report<sup>43</sup>. Yet members of the task force who produced that report were on the U.S. Commission on Ocean Policy when that body recognized the public ownership issues involved and recommended that catch share programs should:

... assign quota shares for a limited period of time to reduce confusion concerning public ownership of living marine resources, allow managers flexibility to manage fisheries adaptively, and provide stability to fishermen for investment decisions [USCOP 2004:290].

Notice that the Oceans Commission saw a need to reaffirm public ownership, not lessen it by talking of privatization and private property rights, yet the commission was clearly aware of the benefits of assigning catch shares.

Finally, we think is important to consider the public trust dimension. There is both the formal Public Trust Doctrine applicable in state waters and the sense of the U.S. government as guardian of the sovereign rights over fishery resources claimed in the EEZ proclamation. We do not understand why there is so little discussion and recognition of the fact that we are talking about the disposition of a public resource. We note that even when the extreme property rights proponents have called for the privatization of the public lands, they at least recognize public ownership and are not so bold as to just call for a free divestiture of a public asset (see Text Box 8).

In contrast, the plan for sectors replicates the “standard” approach to catch shares around the world: catch shares are issued to the original recipients for free, in perpetuity, and are fully tradable (sale or lease). The “in perpetuity” description warrants a brief elaboration. We have heard people stress that the sector allocations are issued annually, leading some to refer to a “renewable privilege” (Johnston and Sutinen 2009:13). But these are the same theorists who argue that catch shares need to be secure property rights, of long duration, in order

**Text Box 8: Why are Fisheries So Different from Other Public Resources?** How PERC talks about privatizing public lands:

Since our concern is with resources now held in the public domain, which in principle belongs to all citizens, it is desirable to permit the broadest possible participation in any divestiture proceedings. If public lands belong to all citizens, then all citizens have a legitimate claim to share directly in the wealth created by divestiture.

[From: “How and Why to Privatize Federal Lands.” T. Anderson, V. Smith and E. Simmons. *PERC Policy Analysis* 363(Nov. 9.1999):8.]

<sup>43</sup> [www.edf.org/article.cfm?contentID=8765](http://www.edf.org/article.cfm?contentID=8765)



to unleash the magic properties of ownership to induce stewardship. In reality, the potential sector contributions *are* a permanent<sup>44</sup> award, they will acquire value and be bought, sold and leased and they are analogous to the permanent award of quota share in the Alaska halibut/sablefish IFQ program. The annual allocation to the sectors is equivalent to the annual issuance of the individual fishing quota to quota share holders.

We do not think there is a serious objection to the characterization of catch shares (to date) as free, permanent, tradable awards. This combination means that the original recipients receive the wealth of the (formerly) public fishery in a process known as the “transitional gains trap” (Copes 1986:287) in which all subsequent generations of fishers are saddled with high entry costs. The full impact and import of this process is perhaps not often expressed or widely understood but is succinctly captured in the following statement:

The overall fishery may benefit economically from [catch shares], although the cost of buying the quota of exiting fishermen may consume much, if not the majority, of the fishery’s overall gains [Redstone Group 2007:1].

This wealth transfer amounts to a substantial privileging of the initial recipients over all other participants (in current and future generations) and in essence is a transfer from the current (public) owners of the resource. This transfer and privileging occur as the result of government action and present the basis for a little known (in the U.S at least) challenge to the conventional design of catch share programs. In December of 2007, the Human Rights Committee (HRC) of the United Nations publicly released its determination that the Icelandic ITQ system constituted a violation of the non-discrimination principle in the International Covenant on Civil and Political Rights (CCPR) to which Iceland is a signatory (HRC 2007).<sup>45</sup> Several facets of the HRC’s approach to this issue are relevant to discussions of catch shares and sectors in New England. Above all, the HRC saw the issue as one of privatization of a public resource. Yet the HRC was careful to note that catch shares in and of themselves were *not* the issue, nor was there any question of the need to manage Iceland’s fish stocks responsibly. The only issue was the particular manner the Icelandic ITQ system was designed and on this point the HRC was clearly most concerned with the free, perpetual gifting of tradable catch shares to selected individuals with no return to the owning public. The HRC noted that under this scheme, the catch shares acquired a property-like character but that under Icelandic law the fish stocks were the common property of the Icelandic nation. Summarizing the plaintiffs’ argument, the HRC decision communication noted:

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<sup>44</sup> The recent contention by Harte *et al.* (2009) that in the U.S. catch shares are of limited duration because they are good only so long as the overarching fishery management plan is in place is disingenuous in our view. By this logic, fee simple tenure in the U.S. is also of limited duration because such property rights are only good as long as the U.S. Constitution is in place.

<sup>45</sup> The Committee’s decision is called its “View” and the document is not easily accessible (we have a copy) but a short synopsis may be found on the web-site of the Icelandic Human Rights Centre: [www.humanrights.is/english/news/nr/2225](http://www.humanrights.is/english/news/nr/2225)

[F]ishing quotas are treated as a personal property of those to whom they were distributed free of charge during the reference period. Other persons, such as the [plaintiffs], must therefore purchase or lease a right to fish from the beneficiaries of the arrangement, or from others who have, in turn, purchased such a right from them. The [plaintiffs] consider that Iceland's most important economic resource has therefore been donated to a privileged group. *The money paid for access to the fishing banks does not revert to the owner of the resource, the Icelandic nation, but to the private parties personally* [HRC 2007:6, emphasis added]

Then, in stating their decision on the matter, the HRC noted:

Allocated quotas no longer used by their original holders can be sold or leased at market prices *instead of reverting to the State for allocation to new quota holders* in accordance with fair and equitable criteria. The [Government of Iceland] has not shown that this particular design and modalities of implementation of the quota system meets the requirement of reasonableness [HRC 2007:20].

In essence, what we see is a questioning of the wisdom, the fairness, and the necessity of the government imposing the transitional gains trap to the benefit of only a select few citizens at the expense of all others (fishers and non-fishers alike). The HRC viewed this extent and character of this government advantaging of some citizens as the essence of government sponsored discrimination. The Government of Iceland's response to the HRC determination is also instructive. The Icelandic government responded (IGR 2008) by saying that the language in the national fisheries legislation declaring the fishery resources to be the common property of the Icelandic nation was essentially meaningless in terms of any property content. In contrast, the government argued that the real property interests in need of protection were those associated with owning catch shares, interests that had built up over the many years the ITQ system had been in existence.

The Icelandic government made this latter argument despite acknowledging that the national fishery legislation declared that catch shares did not convey any property right and were fully revocable. We think this is a clear "tail wags dog" spectacle that should give pause for all involved in the discussions of catch shares in the United States, particularly those using a rhetoric of privatization and property rights. These programs may not (as the government of Iceland suggested) be revocable in practice.

We think it would be a mistake to write off the HCR decision as somehow inapplicable to U.S. experience and sensibilities. We say this for two reasons. First, there is increasing attention to the human rights dimension of fisheries "rights" discussions (see, *e.g.*, most of the entries in Volume 51(November 2008) of the *Sumadra Report*). While this attention is noticeably *not* present in the U.S., we think the trend is clear and irreversible. Second, the core of the HCR decision does resonate with U.S. experience where public trust issues and common use clauses regarding fish and wildlife are enshrined (either in statutes or constitutions or both).<sup>46</sup> Again, we

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<sup>46</sup> A particularly strong example of the parallels with the core issues in the HRC decisions is to

think the trend is towards, not away from, careful attention to such principles.

One way to address the intertwined concerns about free gifting, permanent conveyances and no return to the owning public is via leasing. Leasing is common in the management of other public natural resources in the U.S. Such leasing is between public lessors and private lessees. In New England, under sectors, there *will* be leasing. Most likely a lot (as in most all catch share programs worldwide)---leasing is desirable from the point of view of economic theory as it facilitates consolidation and the migration of shares to those considered to be the most economically productive operations). But the leasing envisioned for sectors is between private parties, *all* of the lessors will be private entities. We question why.

The projected path in New England looks to us something like the following: The American taxpayer is being asked to sanction the permanent, free gifting of a public resource (one might use the word “privatization” here) to a select group of individuals. Other individuals (in the current and future generations) will be put at a competitive disadvantage. Depending on one’s perspective, public trust principles or human rights, or both, may be violated. There will be leasing and this will advantage the initial recipients further. In response to concerns about access, private holding companies will solicit large donations from private parties to buy back some of the catch shares that were freely given away, and then these private holding companies will lease these shares back to fishers, perhaps to those who were disadvantage by the original allocation. In all cases of leasing, the disposition of lease proceeds is under private control and perhaps unknowable to the general public. On top of it all, taxpayers are being asked to pay (\$16 million in 2009 plus an additional \$18 million announced for 2010) to ease this transition to private ownership.

The obvious alternative to all of the above is to follow the suggestion of the U.S. Oceans Commission and use leasing to reaffirm public ownership and eliminate a lot of intermediaries in the process. To repeat, *there is going to be leasing*, so why not have public leasing? We know that public leasing will not destroy the economic benefits people associate with catch shares (Ledyard 2008). And we know that actually using the market in an active, open, and transparent way can provide important equity gains over the government give-away approach (Morgan 1995, 1997; Gylfasson and Weitzman 2003). Notably, the equity gains can apply to *all* fishers (current and future generations) *and* the general public. Public leasing could be done by local municipalities thereby ensuring real community benefits and involvement (Macinko 2007). There are a variety of ways such a system could be designed (Weitzmann 2002; Bromley and Macinko 2007). The investments of current participants can and should be addressed in the transition to such a system and again there are a variety of ways to do this (see, *e.g.*, Bromley and Macinko

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be found in an Alaska Supreme Court case that, while not a fisheries case, does make extensive reference to Alaska’s long judicial history with various forms of exclusive access to fisheries resources, see *Owsichek v. State, Guide Licensing and Control Bd.* 763 P.2d 488 Alaska, 1988. Just as in the Icelandic human rights case, the key attributes the court found to give rise to a sense of offense in *Owsichek* were the free, permanent gifting of a subsequently tradable natural resource-based asset with no return to the owning public.



2007).

*j) Hype does not Help*

We are concerned by the level of hype associated with the consideration of sectors under Amendment 16. Above we addressed what in our view is the significant overselling of the Costello *et al.* (2008) paper and the emphasis on “privatization” that paper was said to “prove” was beneficial to saving fish stocks. However, perhaps the most egregious example of oversell has occurred more recently with the late entry by the Pew Environment Group into the discussion of sectors. In May 2009, the Pew Environment Group released a glossy brochure entitled “One Last Chance” authored by two fisheries economists (see, Johnston and Sutinen 2009). In this brochure, the authors turn away from their long history of championing ITQs to promote sectors. Above, we have addressed the authors’ contentions that sectors are renewable privileges and that sectors are more community friendly compared to ITQs, particularly when it comes to consolidation. We think these aspects of the “One Last Chance” brochure detract from informed consideration of sectors. But the most serious distortion introduced by the brochure concerns the attitudes of fishers towards sectors. Johnston and Sutinen (2009:13) use the example of the Chignik Salmon Cooperative in Alaska to show that fishers are happier under sector-like programs:

Cooperatives also increase satisfaction among fishermen. Knapp (2008) reports that 70 percent of fishermen had either very or somewhat positive feelings regarding the Chignik Salmon Cooperative in Alaska...

The problem here is with what Johnston and Sutinen do not tell the reader about Knapp’s findings. Immediately following his presentation of the data Johnston and Sutinen refer to, Knapp (2008:341) notes that: “Independent permit holders responded that they had opposed the Co-op, that it had made them worse off and that they had negative feelings about the management change.” And then Knapp goes on to describe the redistribution that occurred under the co-op:

Clearly, the Co-op changed the relative distribution of benefits in favour of historically less successful harvesters [Knapp 2008:342].

[T]o its opponents, the Co-op redistributed income away from harvesters able and willing to work for it to those not skilled or hard-working enough to earn it for themselves. As another permit holder put it: ‘This Co-op is something of a welfare program for the people who have a permit but who haven’t fished. They get 9 percent of the total run. Most of those are poor harvesters or they don’t really fish their permit’ [Knapp 2008:342, citation omitted].

What is to be gained by leaving this information out? Fisheries rationalization programs are always complex in terms of the support and opposition they generate and we fail to see how the policy process is advanced by not accurately presenting the distributional stakes involved. Most inexplicable of all is the fact that Johnston and Sutinen did not tell the reader that the Chignik Salmon Co-op was *terminated* (after only a few years in existence) as a result of an Alaska Supreme Court ruling on a legal challenge brought against the co-op by those who opposed it

(Knapp acknowledged this important detail on the first and other pages of his account, see Knapp 2008:335; 343-44).

We think the recent announcement of results from a public opinion poll of the general citizenry in Massachusetts and Maine is similarly misleading and likely to distort the policy process. On June 8, 2009 The Pew Environment Group announced: “Poll Shows Strong Support for a New Management System.”<sup>47</sup> The context of the announcement is such that we think most people will take away the belief that support for *the specific sector scheme* under Amendment 16 is what garnered a high degree of support. But close reading of the announcement shows that the word sector is barely mentioned and the sense is that people voiced support for *a* new system as opposed to *the* new system of sectors. It is instructive to consider the actual question used by the polling firm (supplied to us by Pew on request) that is the basis for the “support” finding:

Up until now, the primary method for rebuilding fish populations has been a top-down approach that places limits on the number of days commercial fishing boats can be at sea and the quantity of fish brought home from each trip. Recently, however, a new management system has been proposed that sets specific annual catch limits for each threatened species of fish. These limits are based on what the best available science says is necessary to restore fish populations. I will tell you more about this plan in a moment, but based on what I’ve told you so far, would you be .... [in favor of such a plan or opposed to such a plan]

Note that this question is really focused on TACs and not on sectors. And we have learned, encouragingly, that people support sound, scientifically based TAC management. But what do responses to this question tell us about attitudes towards sectors? For example, imagine if the new system was referred to as privatizing a public resource, might that influence the general public’s impression of the new system?

Further, notice the reference to “each threatened species of fish” as if all fish are threatened. We think there is a pattern emerging here that comes close to outright fear-mongering. Is there really “one last chance” to save New England’s fisheries and is privatization that *sole* option?

It is time to stop manipulating the relatively uniformed public into thinking that the only choice is between catch share giveaways to select portions of industry versus wide-open fishing that leads to certain ecological ruin. Framing the choice in that way is simply a false dichotomy yet it is precisely what we see happening. Consider how Heal and Schlenker (2008) ended their much-cited companion to the Costello *et al.* (2008) paper. Discussing the future, Heal and Schlenker ponder why there is any resistance to ITQ programs given their obvious benefits:

Some environmental groups are opposed to anything based on market principles. Others feel that ocean fisheries are common property — that everyone should be free to use them, and that it is wrong to establish ownership rights in the sea. It is to be hoped that clear evidence of the effectiveness of ITQs will lead their opponents to think again [Heal and Schlenker 2008:1045].

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<sup>47</sup> [www.endoverfishing.org/newengland/newsroom/release\\_060809.html](http://www.endoverfishing.org/newengland/newsroom/release_060809.html)

Talk of “one last chance,” the repeated characterization of the effort control system designed by the industry-dominated Council as some top-down imposition or even as “communism,” and the caricature offered above by Heal and Schlenker<sup>48</sup> all border on the irresponsible coming from scholars who should be *informing* the policy process of the choices involved. We think it is time to stand up and insist that there are policy options that are not being presented by the current catch share lobby.

The question is *not* whether one is for or against catch shares. Or whether one is for or against markets. These are distortions. The serious question is whether we want to have catch shares in a way that is consistent with public ownership or whether we want to employ catch shares in line with an emphasis on privatization. The only reason to privatize, is to privatize. It has nothing to do with conservation. Masking the push for privatization as the “last chance” to save fisheries only serves to obscure the fact that we face a relatively distinct choice. We can sustain fisheries via catch shares and public ownership or we can sustain fisheries via catch shares and private ownership. We think the Council and the Obama administration are clearly pursuing the latter option *without* any formal recognition of the former. We think it is incumbent upon these policy makers to at least acknowledge the choices involved *and* to provide the citizenry with an explanation of their rationale for turning away from the default position of fisheries as public resources.

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<sup>48</sup> It is ironic that Heal and Schlenker explain some opposition to ITQs in terms of people being opposed to markets as if the standard approach to ITQs is really an embrace of markets. For discussion on the *real* use of markets in fisheries see Ledyard 2008; Weitzman 2002; Gylfasson and Weitzman 2003; Morgan 1997; Bromley and Macinko 2007; and Bromley 2009.



## VI. Conclusions and Recommendations

In this review, we have tried to evaluate the concept of sectors from the standpoint of the specific goals people have for them. Will sectors *save* the New England groundfish fishery? We do not think so. But sectors could be a success nonetheless. The measure of that success will depend on how sectors are constructed and what we collectively want from them. In our view much of the potential of sectors is at risk because of the repeated preference to leave critical, in some cases one can argue essential, details to the private operations of the sectors themselves. Much of the support for sectors in what we call the managerial class seems to be informed by and rely almost entirely upon an ideology that stresses the ability of private interests to regulate themselves for their own good *and* the larger public good. We think recent events in the world have exposed serious flaws in this ideology and question why it has such currency in contemporary fisheries policy given the dramatic nature of its failure in other sectors of economies around the world. Important public interests are being ignored in the rush to implement sectors based on this vision of self-regulation. Above all else, we think there are predictable consequences of pursuing the present path and no one should be surprised a year or five years from now when these consequences come to pass. From our vantage point, New England appears poised to turn away from open markets and democracy and embrace a feudal structure as the salvation to the predictable consequences of avoiding management in the first place.

It is not easy to talk about management in the present context. Because the economic and social stakes are so high, there is an almost built-in tendency to focus on the short term. We sense that, in part, the intense focus on the present generation of boat owners in the groundfish fishery is directly related to the scale of the problem confronting the industry and the Council. Council discussions have openly talked of sectors as a “lifeboat” for the current industry. As we heard at a recent Council meeting: “Just let us fish one more year.” But this has been the strategy for thirty years and it does not seem to be working in the long run for the fish *or* the fishing industry.

“The Council has been known to avoid hard decisions in the past.... [Hayden and Conkling 2008:9].” With sectors, the Council seems poised to repeat past patterns. We would argue that the extent of devolution and deregulation contemplated by the Council is simply a means of avoiding hard decisions. Management by delay is not management. Thirty years of management by delay has produced a fine mess. The sense we have received is that no one is happy, no one really wants exactly what is being pursued, there is little open discussion about the likely consequences of the present path, and remarkably few people are actually involved in determining that path.

Meanwhile is noticeable that there are other dimensions to generalized debates over rationalization programs that are conspicuously lacking from the Council discussions of sectors (e.g., the fate of crew, future generations, and broader public interests). One of the problems with concerns over these other interests is that it is very hard, if not in practice impossible in the political sense, to come back later and address many of these sorts of issues once market-values have been unleashed and powerful political interests are vested by the initial scheme (recall the predicament the government of Iceland finds itself in, now arguing the irrevocability of the

revocable-in-law catch shares). In addition, many other individuals invariably invest considerable sums of money reacting to the displacements caused by the original shift in policy and further adjustments quite possibly are perceived as “threats” to these new investment-backed interests. The political reality is that some concerns *must* be addressed in the original design of the program or else they will in all likelihood never be addressed. This is a sobering conclusion in light of the Council’s announced intention to *avoid* making detailed policy decisions,<sup>49</sup> opting instead to leave these to the privacy of the sector managers.

Looking forward, we offer two sets of recommendations. The first set is focused on the current approach to sectors while the second is focused on an entirely new approach.

a) Recommendations applying to the existing approach to sectors

- Increase outreach efforts
- Develop specific limits on consolidation
- Require direct linkages between municipalities and sectors
- Require direct linkages between private community permit banks and municipalities
- Require sector operation plans to specify contractual limits on individual annual catches within sectors
- Convene an on-going sector monitoring and implementation committee with membership representing the Council, NMFS, the States, all active sectors, industry not affiliated with any sector, and broader public interest representation
- Convene a Council sponsored committee to openly discuss the relationship between sectors and ITQs, including the possible future transition from one system to the other

It is clear that substantially more information on sectors needs to be disseminated to all levels of industry. We think this information need is particularly important given the hopes being placed on sectors. We think the current state of information potentially spells trouble (perhaps even violence) when the realities of catch share/TAC management are made clear to *all*.

A strong argument can be made that there is a broad public interest in informed decision-making (especially when it concerns public resources) by an informed citizenry, including affected stakeholders. Serving or addressing this public interest is clearly a function for which government is well suited. Ideally, outreach should be as neutral as possible, and great care will need to be taken to not simply continue the processes that have been followed to date and end up promoting the sense that sectors are the *only* option available or will deliver more than can be expected of them.

We think the Council is deferring too many decisions that have a broad public interest component to sector leadership. Serious issues like ties to communities and consolidation must be addressed up front by policy makers responsible to a broad public constituency. We think the Commonwealth clearly has an interest in *communities* and thus in municipally-controlled permit

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<sup>49</sup> We note that the Council did not even select any “preferred alternatives” for Amendment 16 prior to the public hearings.

banks run (indeed chartered) according to democratic principles. This interest is best addressed directly.

Our understanding of current sector internal contracts is that they are far too vague on the subject of catch accounting to be successful once TACs are routinely attained. Similarly, the whole subject of catch accounting and monitoring needs substantial attention from a broad spectrum of interests and perspectives.

Our conversations with industry and managers suggest that there is more support for ITQs than is publicly acknowledged. Moreover, the majority of people we spoke with think the sector system will evolve into ITQs, perhaps relatively quickly. But these are private conversations. We think it only makes sense to have an open, public, discussion of ITQs and sectors. Additionally, we sense that people think of sectors and ITQs as mutually exclusive. This need not be the case. For example, we noted that a truly voluntary system would feature direct awards (or purchases/leases) of catch shares by individuals who could then either fish them as individuals *or* elect to pool together with others in sectors/cooperatives. Note that we are *not* advocating ITQs *per se*, but rather making the case that New England would benefit from an open discussion of ITQs.

*b) Recommendations applying to a new approach to catch shares in New England*

In our view, the “standard” approach to catch shares is increasingly difficult to defend and we have written extensively on the nature of the problems posed by free, permanent gifting with no return to the public (Macinko and Bromley 2002; Bromley and Macinko 2007). We suspect that some of those problems are extremely relevant in the context of New England groundfish. Our contention is that most of the adverse consequences associated with catch shares are solely the product of the standard approach (Macinko 2005), *not* something inherent in the simple concept of subdividing a TAC into individually assigned catches.

Ours is *not* an anti-catch share message. To the contrary it is a plea to stop repeating a pattern of inflicting unnecessary pain through the stubborn application of the give-away model of catch shares. Catch shares can, and we argue must, be designed that impose fewer social, economic, and ecological costs than those we think are associated with the standard approach grounded on an appeal to faith in self-interest, self-regulation, and privatization. We also reject the tendency towards ends-justify-the-means rationales we sense in the current approach to sectors, most noticeably on the part of some environmental advocates who are willing to incur substantial inequities just to get to TACs.

We think it is critical to separate fishery *management* policies should from *economic disaster relief* policies and that both would benefit from such separation. There are more open and direct ways to provide economic relief than through the permanent allocation of the fishery. Again, fisheries policy seems distinctly out of sync with our nation’s approach to similar issues. When the mid-west suffered catastrophic flooding last spring, there was much talk of disaster relief but no talk of accomplishing that relief by effectively *giving* shares of the Mississippi River away to beleaguered citizens in the region. We propose addressing the economic issues directly, and then focusing on how to introduce catch shares in a manner that preserves more of a



sense of fair play between all the various interests in the industry, the public, and future generations.

We think the broad contours of the alternative to the standard approach are fairly clear:

- Opt for some version of the U.S. Ocean Commission's recommendation for limited duration shares coupled with public leasing to handle the periodic reallocation of shares. Leasing would be competitive (but there could be TAC partitions to accomplish desired goals), open (transparent), and frequent—thus ensuring fluid markets and opportunities for all to enter. Leasing would be between governments (at local, state, or federal levels or combinations thereof) and fishing firms. Communities (entire municipalities and their residents) would be involved directly. A portion of the lease proceeds could be used to fund necessary management and monitoring costs.
- Design the above specifically to compliment some vision of a desired future for the fishery *and* communities. This would require:
- Engaging in focused planning sessions to consider what future is desired for the groundfish fishery and communities. For example, how do people evaluate the tradeoffs between a broad array of small ports dominated by small vessels and firms versus a more concentrated vision featuring fewer, larger ports with larger vessels?
- Decide on a preferred approach to the transition to the new system.

The last element mentioned above is particularly critical. There are existing interests in play and an instant transition to a new system is not technically feasible or fair. We see two broad options for a transition:

1. Adopt some form of an "interim" sector program. This would only be in place for a fixed, relatively short period of time (*e.g.*, 1-5 years) while full consideration is given to the design and implementation of the new public leasing model. This could be based directly on the plans for sectors under Amendment 16.
2. A total buyout of the existing groundfish fleet. This would provide direct economic relief but would also be understood to extinguish any claims to priority access, treatment, or history when re-entering the fishery under the public leasing model. This buyout could be funded by a combination of redirecting the current supplemental funds announced for the transition to sectors and additional appropriations. It would be hoped that private donors interested in the reform of fisheries management in New England would also contribute at the rate they have been to the pursuit of the privatization model.

We note that these options are not mutually exclusive.

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## Appendix I

### NEFMC SECTOR TIMELINE – Key issues in bold

|                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| January 18, 2007 – Groundfish Committee                         | <ul style="list-style-type: none"> <li>- Discuss Scoping Period for Am. 16               <ul style="list-style-type: none"> <li>- DAS modifications</li> <li>- Hard TAC/Quota/ITQ</li> <li>- Area management</li> <li>- Point system</li> <li>- Hard TACs as stand alone option removed</li> </ul> </li> </ul>                                                                                         |
| February 8, 2007 – NEFMC meeting                                | <ul style="list-style-type: none"> <li>- Revisions to DAS in Am. 16</li> <li>- Voted against ITQ as option for Am. 16</li> <li>- Voted to include area management, points system as alternatives for Am. 16</li> <li>- Modifications for sector rules to be done in a Sector Omnibus Committee</li> </ul>                                                                                              |
| February 22, 2007 - Sector Omnibus Committee<br>(first meeting) | <ul style="list-style-type: none"> <li>- Debate over sectors as LAPPs</li> <li>- Role of hard TACs in a sector</li> </ul>                                                                                                                                                                                                                                                                              |
| March 29, 2007 – Sector Omnibus Committee                       | <ul style="list-style-type: none"> <li>- Sectors will establish ACLs and AMs</li> <li>- Sector shares allocated a % of ACLs</li> <li>- Discuss sector size and “sideboards”</li> </ul>                                                                                                                                                                                                                 |
| April 19, 2007 – Groundfish Advisory Panel                      | <ul style="list-style-type: none"> <li>- Allocation issues should be addressed by Groundfish committee, not sector omnibus committee</li> <li>- Splits in history due to leasing may increase capacity</li> <li>- <b>Recommend that the Council or NMFS notify all individual permit holders of their estimated allocations under each management option prior to any management action</b></li> </ul> |
| April 20, 2007 – Groundfish Committee                           | <ul style="list-style-type: none"> <li>- Debated over whether to do DAS alternatives in Am. 16 or 17, tabled the debate until May 31.</li> <li>- <b>Requested the Council include changes to specific groundfish sector guidance in Am. 16</b></li> </ul>                                                                                                                                              |
| April 26, 2007 – Sector Omnibus Committee                       | <ul style="list-style-type: none"> <li>- Discuss sector size, baseline, sideboards, quota transfers</li> </ul>                                                                                                                                                                                                                                                                                         |
| May 29, 2007 – Groundfish Advisory Panel                        | <ul style="list-style-type: none"> <li>- Debate when and how sectors should be implemented, but make no applicable recommendation</li> <li>- Recommend development of an allocation formula</li> </ul>                                                                                                                                                                                                 |
| May 31, 2007 – Groundfish Committee                             | <ul style="list-style-type: none"> <li>- <b>Recommend that sectors and other DAS alternatives belong in Am. 17</b></li> </ul>                                                                                                                                                                                                                                                                          |
| June 19, 2007 – NEFMC                                           | <ul style="list-style-type: none"> <li>- <b>Approves a “Sector Policy”</b></li> </ul>                                                                                                                                                                                                                                                                                                                  |
| June 21, 2007 – NEFMC meeting                                   | <ul style="list-style-type: none"> <li>- <b>Sectors, and allocations to sector members, to be included in Am. 16</b></li> <li>- Other DAS alternatives, including IFQ, points system, and area management remanded to Am. 17</li> <li>- No more sector proposals will be included in Am. 16</li> <li>- Sector omnibus committee disbanded</li> </ul>                                                   |

|                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| August 1, 2007 – Groundfish Committee                      | <ul style="list-style-type: none"> <li>- Debate baseline period, consolidation issues, allocation, and trading between sectors</li> <li>- Discussed, but took no action, on effort controls for “common pool”</li> </ul>                                                                                                                                                                                                                                                                                                             |
| September 5, 2007 – Groundfish Committee                   | <ul style="list-style-type: none"> <li>- Regional Administrator (RA) is concerned about a lack of attention on effort controls</li> <li>- Approve motions for allocation baselines and formulas</li> <li>- Discuss voluntary aspect of sectors, remove cap %</li> </ul>                                                                                                                                                                                                                                                              |
| September 18, 2007 – NEFMC meeting                         | <ul style="list-style-type: none"> <li>- <b>Work on sectors is suspended until the groundfish committee completes a plan for May 2009 biological targets that include: DAS modifications, annual catch limits, accountability measures, recreational measures.</b></li> <li>- Groundfish committee directed to consider a hard TAC backstop for the common pool.</li> </ul>                                                                                                                                                          |
| October 16, 2007 – Groundfish committee                    | <ul style="list-style-type: none"> <li>- Made recommendations for DAS modifications, ACLs and AMs for all groundfish stocks</li> <li>- Passed a motion that the committee present all sector work accomplished to the Council at the November meeting.</li> </ul>                                                                                                                                                                                                                                                                    |
| November 7, 2007 – NEFMC council meeting                   | <ul style="list-style-type: none"> <li>- Council approved recommendations by the groundfish committee for DAS modifications and a hard TAC backstop to help meet the ACL/AM requirements, as well as alternatives to mitigate fishery problems with the hard TAC.</li> <li>- Council agrees that ACL/AM process requirements will be in Am. 16</li> <li>- <b>Council votes to direct the groundfish committee to continue work on sectors, DAS modifications, recreational measures, and ACL/AM processes for Am. 16.</b></li> </ul> |
| December 7, 2007 – NMFS letter to NEFMC                    | - <b>NMFS NERO sends a letter to the Council expressing concerns that Am. 16 and sectors development will not be completed on time. The letter suggests delaying sector implementation until 2010.</b>                                                                                                                                                                                                                                                                                                                               |
| December 13, 2007 – Groundfish Committee                   | <ul style="list-style-type: none"> <li>- Discuss the letter from NMFS</li> <li>- Debate whether to push back sectors, possibly IFQ until Am. 17</li> <li>- It is revealed that confidentiality/ownership issues are slowing the permit history process.</li> <li>- Recommend sector baseline alternatives</li> </ul>                                                                                                                                                                                                                 |
| January 24, 2008 – NEFMC meeting (focused on sectors only) | <ul style="list-style-type: none"> <li>- “Goals” for sectors approved by the Council, the goals include: <ul style="list-style-type: none"> <li>- Address bycatch issues</li> <li>- Simplify management</li> <li>- Give industry greater control over their own fate</li> <li>- Provide a mechanism for economics to shape the fleet rather than regulations (while working to achieve fishing and biomass targets)</li> </ul> </li> </ul>                                                                                           |



|                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                          | <ul style="list-style-type: none"> <li>- Prevent excessive consolidation that would eliminate the day boat fishery.</li> <li>- Four sector allocation alternatives approved</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                  |
| February 11, 2008 – Groundfish Committee | <ul style="list-style-type: none"> <li>- Debate over permit history</li> <li>- Discuss ACL recommendation</li> <li>- Debate rules for limited access multispecies permits with or without A DAS.</li> <li>- Discuss problems with continued development of effort controls</li> </ul>                                                                                                                                                                                                                                                                                   |
| February 13, 14, 2008 – NEFMC meeting    | <ul style="list-style-type: none"> <li>- Continued work on ACL policies, admits that Committee needs to do more work on ACLs</li> <li>- Discussed requirements for sector operations plans</li> <li>- Council removed the 20% cap for sector allocations</li> <li>- Discussed other sector issues such as US/CA area, transfer of catch entitlement, mortality controls, exemptions, effort controls, and accountability measures.</li> <li>- Clarified its sector policy, including issues regarding voluntary commitment, acceptance, and liability issues</li> </ul> |
| April 16, 2008 – NEFMC meeting           | <ul style="list-style-type: none"> <li>- Discussed sector allocation, ACL/AM issues</li> <li>- Proposed AMs for common pool remanded back to the planning development team</li> <li>- <b>Start date for sectors delayed until 2010</b></li> </ul>                                                                                                                                                                                                                                                                                                                       |
| May 13, 2008 – Groundfish committee      | <ul style="list-style-type: none"> <li>- <b>Agrees to accept the default 18% DAS reduction</b></li> <li>- Recommends no in-season AM, discuss other AM issues</li> <li>- <b>Recommended that all Am. 16 sector policy revisions be implemented in 2010.</b></li> </ul>                                                                                                                                                                                                                                                                                                  |
| June 4, 2008 – NEFMC meeting             | <ul style="list-style-type: none"> <li>- <b>Am. 16 development put on hold due to changing rebuilding targets associated with less productive stocks and concern that the draft effort control measures in Am. 16 may not be targeting the correct stocks.</b></li> </ul>                                                                                                                                                                                                                                                                                               |



**Paul J. Diodati**  
*Director*

## *Commonwealth of Massachusetts*

### **Division of Marine Fisheries**

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**Deval Patrick**  
*Governor*

**Ian A. Bowles**  
*Secretary*

**Mary B. Griffin**  
*Commissioner*

February 9, 2011

Mr. John W. Pappalardo, Chairman  
New England Fishery Management Council  
50 Water St., Mill 2  
Newburyport, MA 01950

Dear John:

I offer the following comments based on the Council's Monkfish Catch Share Scoping Document referenced in the Federal Register of December 9, 2010. I have forwarded a copy of my comments to Pat Kurkul as well. Back on January 4, 10, and 11 public hearings were held in Massachusetts. I add my preliminary views about this critical issue clearly related to monkfish allocation and not overfishing.

The Scoping Document begins by mentioning the NOAA National Catch Share Policy; according to the policy, catch shares are an "effective tool to rebuild fisheries." This immediately raises the question as to whether monkfish are overfished and is overfishing occurring. Neither is the case for both northern and southern management areas (NMA & SMA). In fact, we have reached and exceeded our biomass targets according to Framework 7 that adopted revised biomass reference targets and control rules based on SARC 50 and SSC recommendations. We are rebuilt! Of special note, current biomass greatly exceeds the biomass target for the SMA and considerably so for NMA. Even with previous reference points, we exceed NMS/SMA targets.

Fishing mortality in 2009 was 0.09 for NMA and 0.12 for SMA.  $F$  is far below  $F_{\text{threshold}}$  for both areas (0.43 NMA and 0.46 SMA). Consequently, catch shares for the monkfish fishery to rebuild the monkfish fishery is a non-sequitur. We have achieved our biological objectives for monkfish without catch shares; therefore, shares are very difficult to justify from a conservation standpoint.

Moreover, after reflecting on scoping document "questions for consideration," I conclude the Council (we) missed an important question: "Is it appropriate to establish shares, likely based on historic catches only, when percent shares are applied to a rebuilt stock, such as monkfish?" In other words, should there be limits to the amount of actual poundage a shareholder or sector can acquire due to increased abundance? Opportunity for new entrants hinges on this consideration; perhaps quota should be set-aside for equitable distribution to new entrants.

Applying a fisherman's set percentage acquired when stocks were low (perhaps overfished with overfishing occurring) to increasing ACLs, represents a tremendous boon to the fisherman. It results in an allocation far higher than past historical catch(es) for that fisherman. We're doing this now for groundfish permit holders with little if any regard for the tremendous windfalls they will

receive as rebuilding continues and ACLs increase. Consider for example, currently one groundfish sector “owns” 30% of Georges Bank haddock ACE (about 26.4 million pounds).

A related question is: “With a rebuilt stock (i.e., monkfish) is it appropriate to adopt a catch share program for social and economic purposes?” This question is rhetorical because National Standard 5 states: “Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; *except no such measure shall have economic allocation as its sole purpose* (emphasis added).” No matter how we may spin it, monkfish catch shares ultimately will be for economic allocation solely with the understanding that allocation may lead to increased economic efficiency and other alleged benefits.

Furthermore, optimizing efficiency and quantifying benefits has become a wild goose(fish) chase because of confidentiality concerns. An examination of what is “owned” by each permit holder within that sector (and other sectors) would be enlightening and promote transparency. Currently groundfish sector transactions are clouded in secrecy. The Scoping Document reference to “quota trading mechanisms” addresses transparency and monitoring transfers. I suspect many will argue that private business decisions should remain private. I will disagree; has management given rise to the perfect market with no need for oversight?

I argue that gifting public resource quota and privileges to private fishermen catching/landing monkfish mandates critical decisions on NOAA’s Catch Share Policy “guiding principles” such as “allocation” and “review process” whether it be for IFQ or sector management. Refer to those principles.

One long-overdue decision by the Council, agreed upon in January, is to “determine the degree to which the groundfish fleet has consolidated and fishing privileges have accumulated for individual permit holders under Amendment 16 and to include social and economic impacts of permit banks...” This analysis will occur one-year after Amendment 16 implementation, and then there will be “continued scoping on accumulation limits” once the Council receives the analysis. It should remind us that before we venture head-long into monkfish catch-share management (e.g., ITQ or sector management), we need to “go to school” using groundfish 2010 sector management as our text for “lessons learned.”

One lesson already learned is the need for a control date on accumulation limits to deal with fleet diversity and other issues. The Council voted for a groundfish fishery “accumulation limit” control date. We wonder what this forebodes for monkfish catch-share management. Will the goose already be out of the barn at the expense of desirable fleet diversity however that may eventually be defined by the Council?

Developing a definition for “excessive” also is seriously hindered by confidentiality concerns. We are not positioned to review the nature and degree of consolidation in the groundfish fishery, to our detriment, so duplicating this dilemma for monkfish will be unwise. Until Magnuson is amended to deal with confidentiality in the context of proper oversight of catch shares, monkfish catch shares are very difficult to defend let alone manage adaptively.

Assuming that the Council decides to forego IFQ management for monkfish but decides to pursue the “easier” approach of sector management, I suggest the Council be more assertive with how a sector self-regulates. At this time, the Council has placed no restrictions on how a sector consolidates from within. Consequently, we are witnessing (to the extent that we can) larger and well-financed permit holders lease away quota from sector members with smaller, uneconomic



allocations or buy those permits outright. Fleet diversity is now being implicitly defined as active fishermen and “armchair” fishermen who no longer contribute to the socioeconomic fabric of the fleet and fishing communities except to supply quota to permit holders who can and are able to thrive through consolidation. – at the expense of real diversity.

Potentially moving to a catch-share management program for monkfish should spur the Council and NOAA to address the reality of groundfish sector management, i.e., sector participants acknowledge they are operating as if they have ITQs. Notwithstanding legal counsel unwritten advice that we do not have ITQs, all groundfish fishermen have been assigned allocations based on their PSCs. It seems self evident that sector fishermen have ITQs subject to some sector oversight that in practice doesn’t take away fishermen’s freedom to be entrepreneurial with their individual quotas.

I urge the Council to deal with this ambiguity before committing to monkfish sector management. I recognize the delicacy of this issue since what is concluded for monkfish likely will have an impact on groundfish sector management. I do not raise this issue as a new concern. DMF highlighted this concern in our comments on 17 proposed sector agreements (sector operations plans) for FY 2010 (January 18, 2010) and on Framework 44 proposed rules (February 26, 2010). Groundfish ITQs appear to have been nuanced as PSC (potential sector contributions).

Perhaps the best solution is for the Council to proceed directly to IFQ debate and avoid the uncomfortable discussion about sector management vis-à-vis IFQs. Then again, that decision will force us to deal with National Standard 5 issues, confidentiality concerns related to socioeconomic analyses of this allocation scheme, and referendum requirements. This will take considerable time, of course, but it’s a far better alternative to a quicker and hasty implementation of monkfish sectors that will overlap groundfish sectors.

Regarding sector management for monkfish, I suggest the Council read the report “A New England Dilemma: Thinking Sectors Through” by S. Macinko and W. Whitmore (June 2009). This report already should be available through the Council office. As the authors indicated: “This report was commissioned by DMF...DMF sought an ‘outside’ consideration of the current policy process playing out in the NEFMC arena regarding...the movement towards a management tool known as sectors.” This report is well done, insightful, and necessarily provocative, e.g., refer to authors’ comments on sectors and stewardship and “devolution versus abdication.”

While DMF does not agree with all of their assertions, many of their arguments and conclusions appear on target. I suspect some NMFS economists might share DMF’s assessment of Macinko and Whitmore’s work. I recommend this report be a valuable reference for our continuing sector management discussion on monkfish.

A good set of questions were developed for the scoping document. However, I offer no answers at this time because I believe the Council must first answer the pivotal questions posed herein. In summary:

(1) Monkfish is rebuilt, neither “stock” is overfished, and overfishing is not occurring; therefore, why are catch shares needed for a stock(s) not in need of rebuilding?

(2) Is it appropriate to establish shares, likely based on historic catches only, when percent shares are applied to a rebuilt stock, such as monkfish; i.e., should there be limits to the amount of tonnage (poundage) a shareholder(s) or sector(s) can possess?

(3) With a rebuilt stock (i.e., monkfish) is it appropriate to adopt a catch share program for social and economic purposes?

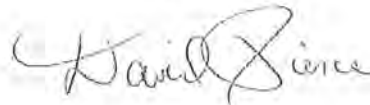
(4) Isn't it premature to venture head-long into monkfish catch-share management (e.g., ITQ or sector management) before we "go to school" using the first year of groundfish catch share management (sector) experience as related to consolidation and excessive shares?

(5) Should confidentiality constraints on responsible, adaptive management be removed before monkfish catch shares are considered?

(6) What is the definitive answer on monkfish sectors being de facto ITQs established without benefit of a legally required referendum?

I have provided answers to the aforementioned questions. There will be differences in opinion. Nevertheless, I've listed my primary concerns and have offered a few recommendations to assist the Council's scoping.

Sincerely yours,

A handwritten signature in cursive script that reads "David Pierce".

David Pierce, Ph.D.  
Deputy Director

cc  
Paul Diodati  
Dan McKiernan  
Melanie Griffin  
Pat Kurkul  
Paul Howard

**From:** Richard McBane <mcbaner@meredith.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Concern about Catch Shares for monkfish  
**Date:** 02/01/2011 1:09:27 PM

I am writing to express my concern about the equity of any plan to regulate the catch of monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

One might even consider distributing Shares every five years through a lottery. This would allow fishermen to recoup their investment without "locking in" a privileged class of industrialized fisheries who have historically been driven solely by profitability instead of sustainability of ecosystem balance and health. This would also create a market for Catch Shares that would benefit small fishermen who might choose to sell their Shares rather than exercise them, and larger fishing concerns would have to bid an equitable price for any shares beyond those received in the lottery.

Thank you for this opportunity to comment and I look forward to your response.

Richard McBane  
216 1/2 Hawthorn Rd  
Raleigh, NC 27605



Riverhead

**Monkfish Defense Fund**

c/o Marc Agger  
Brooklyn Navy Yard, Bldg. 313  
Brooklyn, New York 11205

January 30, 2011

**Subject: Comments on the Monkfish Fishery Management Plan Amendment 6 - Catch Shares Discussion and Scoping Document.**

The Monkfish Defense Fund (MDF) is an association of monkfish fishermen, dealers, processors and exporters. Following are our comments on the Catch Shares Discussion and Scoping Document.

- 1) The Monkfish Defense Fund (MDF) is opposed to any form of Sector Management in the Southern Management Area (SMA), and is equally opposed to any attempts to LINK monkfish management in the SMA to the New England Groundfish Sector Management System in any way, shape or form.
- 2) The MDF supports having each permitted monkfish vessel's catch history in the Northern Management Area (NMA) and SMA clearly defined and restricted to that particular management area when determining future allocations, catch shares, quotas, any NMA-only sector program, etc.
- 3) The MDF urgently requests the councils reaffirm the Control Date for permitted monkfish vessels to coincide with the end of the 2009 fishing year at the earliest possible moment.
- 4) Considering the differences in the characteristics of the monkfish and associated fisheries in the NMA and the SMA, the MDF supports separate and distinct management regimes in each area if the industry in the North and the South cannot come to agreement over a single management program.
- 5) The MDF supports having a double referendum for all legitimate permit holders in the SMA to determine if the fishermen: (1) wish to explore the possibility of fishing under a catch shares program; and (2) to approve any final catch share program. Each referendum would be subject to the two-thirds majority requirement for adoption.
- 6) If the initial referendum shows that members of the fishery in the SMA are in favor of considering management via catch shares, the MDF requests that the Monkfish Catch Share Allocation and ITQ Referendum Proposal – revised 6/4/09, serves to initiate discussions on catch shares. The MDF does not endorse any of the particular options presented in the document, nor does it reject any options that are not included.
- 7) The MDF supports having the SMA monkfish fishery included in the Mid-Atlantic Council's "visioning process" for a discussion of potential catch share fisheries in the Mid-Atlantic region. The MDF believes this is an opportunity to inform future decision-making in the region that should not be ignored.
- 8) The MDF does not support moving forward with a catch share program while the monkfish stock remains in a data poor condition. The MDF requests that NMFS take whatever steps are necessary as soon as possible to have monkfish removed from the "Data Poor Species List"

including at least two more cooperative trawl surveys, one conducted every second year beginning in the spring of 2012.

- 9) The MDF will not support any management regime in the SMA that substantially changes the character of the fishery as it exists today if it is not designed and accepted by a majority of fishery participants.

The MDF believes that monkfish management as it is currently being done is meeting the needs of the monkfish industry and that from fisherman to dealer we would all be better served if resources that would be committed to designing and then "selling" a catch shares management program in the SMA were instead devoted to increasing the level of knowledge of the monkfish stock. Simply removing monkfish from the Data Poor category would provide significant tangible benefits to the participants in the fishery (as well as to the fish) while entailing none of the dislocations that a move to catch shares would unquestionably generate.

Finally, we have been informed that the Mid-Atlantic Council has formed a Social Science Subcommittee of its Scientific and Statistical Committee. While it's not a part of the scoping document, we are taking this opportunity to request that this Subcommittee explore Community-Based Management options which might be appropriate for the monkfish fishery in the Southern Management Area. We will provide as much input, information and support to this effort as we are able to.

Sincerely,

Marc Agger  
Email: [marcagger@gmail.com](mailto:marcagger@gmail.com)  
Telephone: 718-855-1717

To Whom It May Concern:

As a monkfish permit holder, I feel it my obligation to express my concerns and considerations about moving to a catch share management system. I currently hold a category H permit #223687. I received the permit two years ago, after college at the age of 22, from my father who purchased the permit a couple of years before with my future in mind. Without being able to travel above the 38.40 latitude line and strict marine mammal laws, harvest with the category H permit is extremely restricted and our true landing potential has not been achieved.

I personally think our current DAS system works well with my style of fishing. A perfect catch share for me would be my current daily poundage multiplied by my DAS so I would be able to use the full potential of my permit and clear my nets instead of leaving fish when my daily limit is met. Recent landings history allocation would all but eliminate mine and most other category H permits. This permit has the potential to provide about 50% of my yearly income and has been a great source of income the past two years.

I hope the information I have provided can be helpful in your decision making process. If I can be of anymore assistance feel free to contact me. Thank you for your time.

-Thomas E. Newman III

Phone: 252-542-0449

Email: [thomas.newman03@gmail.com](mailto:thomas.newman03@gmail.com)

Address: 462 Main St., Swanquarter, NC 27885



**From:** Heidi Reinhard <hsreinhard@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Re: Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:08 PM

No problem. Living near Gloucester, MA, I know fish to be more than an economy but part of the culture too.

Hope this turns out well.

On Tue, Feb 1, 2011 at 12:56 PM, <monkfisha6@noaa.gov> wrote:

> Thank you for your input on the development of Monkfish Amendment 6.  
>

## Proposal For H Category Monkfish Permit

The purpose for this proposal is to better understand how H category Monkfish permit holders feel about the introduction of catch shares into the H category Monkfish fishery. Considering the history of the H category permit: 1. In 1997 there was a geographical line change that required us to have Federal Monkfish permits; beings where we didn't have Federal reports to support the fact that we were fishing prior to this time to we didn't get permits to continue fishing. We lost the right to harvest Monkfish in the waters of our home states because of a regulation that didn't recognize the very fisherman of that specific region. 2. In 2003 we got our permits from NMFS, they were called H category permits. There were 6 permits granted to the fishermen that could verify that they had landings before the 1997 line change. There was a Northern boundary placed on these permits, it is the 38.40 line. This line was put into effect in case there was a large influx of boats that also tried to enter the fishery under the same criteria. There are still 6 permits to this date. Some of these permits have been sold or transferred to other boats. Some have history, some do not, but they were granted by the history prior to 1997.

There is an environmental issue that is very influencial on the H category permit, which is marine mammal closures. The Harbor Porpise closure from February 15<sup>th</sup> to March 15<sup>th</sup>, The Sea Turtle rolling closure where as you must fish above the 37.56 line after April 15<sup>th</sup> until January 15<sup>th</sup>. This line 37.56 is approx. 40 miles below our Northern boundary; not much room to conduct a fishery that needs to move North as the water warms with Spring.

In North Carolina there are strong regulations that say you must fish inside of 3 miles and outside of 2 miles. What this means is that instead of going to the fish, you must wait for the fish to come to you. This area is from Wimble Shoal to the NC-VA state line from March 15<sup>th</sup> to April 15<sup>th</sup>'s large mesh closure. This area only offers about 20 miles of actual fishing bottom.

These are the facts about the regulations that the H category fishermen face. This should answer any concerns about the lack of opportunity to fully utilize the permit; simple, the restriction prevents using all the DAS which doesn't represent the potential which this group of fishermen could produce under a different management plan.

Our recommendations would be if the system we now operate has to change, let it be industry driven. If we have to change from DAS please recognize this lack of opportunity to utilize the H permit. Our recommendations would be, 1. A three year pilot program which would grant the DAS X daily weight, without daily weight limits. There would be dockside monitoring from the VMRC in Virginia and NCDP in North Carolina law enforcement to keep landing weights. This freedom from daily weight limits would have a number of benefits, not only to the fishermen's standpoint but also environmental issues as well. The whole idea would be a quick fishery in which you could keep nets clear, reduce by catch and maintain top quality product.

Considering a three year pilot program there could be the option to continue if it works well or to discontinue if not satisfying to the industry. There could be adjustments made if there were any disadvantages to other permit holders.

The H category Monkfish permit holders all agree on these facts. We disagree with any form of catch share program that would possibly enable the buying and selling of the right to harvest Monkfish, which could be taken from the communities that depend on them.

We appreciate your time as an advisory panel in considering the unique characteristics of the H category fishery. We also understand that what we are asking for may seem extreme, it only equals the amount of perseverance it required to endure the hardships related to the uncertainties of the H category monkfish fishermen. Also to consider is the on going environmental issues that the future brings involving marine creatures that pose a threat to how, where and when the H category permit holder can operate.

Thank you, H category permit holders

Chris Walker F/V Krista-Caleb-Morgan

Jamie Wescott F/V Risky Business

Tommy Danchise F/V Handfull

Randall Morgan F/V Miss Donna

Thomas Edward Newman F/V Got To Go

F.G. Gibbs F/V Papa's Girl



## ENDEAVOR FISHERIES, INC.

8 WEST 8TH ST.

P.O. Box 31

BARNEGAT LIGHT, NJ 08006-0031

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My Name is Kevin Wark I am a board member of the Garden state Seafood Association , owner and operator of the fishing vessel Dana Christine out of Barnegat Light and a monkfish advisor since the inception of the panel in the early 1990s. I have to say I am not completely against catch shares but I totally oppose sector management we are not Ground fisherman we are Monkfish only permit holders and do not need a complex and controversial system like sectors. But to add to that if a catch share system is adopted we must keep the integrity of the north , south line and keep all accumulated history in there respective areas because of the higher trip limits and greater amount of days that where enjoyed by our counterparts to the North and any transfer of effort into the south with its smaller TAC is not acceptable, I believe it will be a problem in a catch shares system without restrictive stacking provision as well as gear limits that the current system has addressed through trip limits. When I ponder a catch shares system with out numerous straw men to examine its hard to make a educated comment on catch shares which Leeds me to the suggestion of including this fishery in the Mid Atlantic councils visioning process so the participants in the south have a greater say in there regional fishery because of the major differences between the monkfish only permits holders and Ground-fisherman this important fact can not be ignored. I personally would like to see equal rolls played by both councils because frankly the ground fish management rules have often resulted in more complex rules that subjected mid Atlantic Fisherman to the back lash of the Groundfish regulations. Having said that I do believe that the referendum process is extremely important as well as removing monkfish from the data poor species list and continuing the cooperative survey work that has been key in the accurate assessment of the Monkfish stock. Having been involved in the management of this species and as member of all the current Take Reductions teams I highly recommend moving forward with caution so not to upset the current balance that has been struck by a lot of hard work by council and industry members in the past. And last I would like to say I have always suggested a fish for time system with the ability to bring in your overages which would reduce your available time at sea and not waste fish. But along with this must come restrictive net limits so smaller operators would not be displaced and use of current Days at Sea and trip limits would be key as guidelines to keep the fishery to its historic levels of effort and proportion pertaining to the makeup of the fleet, this to is a form of catch share .

**From:** Marcy West <marcywynne@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Marcy West  
1 Yerxa Rd  
Cambridge, MA 02140

From: p caporrino <kabrini@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:51:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

p caporrino  
625 park ave  
hoboken, NJ 07030



**From:** Peter Gawle <pgawle@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Peter Gawle  
19 Madison Ave.  
Sharon, MA 02067

**From:** Susan McFadden <smcfadden2002@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Susan McFadden  
3473B S. Stafford St.  
Arlington, VA 22206  
5712727621

**From:** Arielle DiGiacomo <ardigiacomo@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Arielle DiGiacomo  
14 Fieldston Rd  
Princeton, NJ 08540



**From:** Ed Ferrara <edferrara@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ed Ferrara  
651 2nd Ave.  
Long Branch, NJ 07740  
7733873278

**From:** Phoebe Pitassi <october71@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Phoebe Pitassi  
24 Scenery Lane  
Johnston, RI 02919  
4013001992

From: Marcus Rozbitsky <rozbitsky@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:51:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Marcus Rozbitsky  
50 Gold Star Road, Apt. 1  
Cambridge, MA 02140  
6179559777



**From:** Laurel Campbell <namastell1@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Laurel Campbell  
1617 Orleans Road  
Harwich, MA 02645

**From:** Susan Szewczuk <susans@lmairtech.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Susan Szewczuk  
2 Sheffield Way  
Clark, NJ 07066

**From:** Benjamin Phillips <bphillips@sc.org.ni>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Benjamin Phillips  
4 Ashburton Place  
Cambridge, MA 02139  
203-221-4224

**From:** Nick Berezansky <nick@acereprographic.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nick Berezansky  
123 Washington Pl.  
Ridgewood, NJ 07450  
201 670-6814



**From:** Daniel Tillinghast <dantiller2001@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:27 PM

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Thank you for this opportunity to comment and I look forward to your response.

Daniel Tillinghast  
20 Pheasant Lane  
Barrington, NH 03825

From: Jan Ochs <janochs@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:51:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jan Ochs  
90 Forest Lane  
90 Forest Lane Pinehurst, NC 28374  
Pinehurst, NC 28374

**From:** Bob Duke <bdd775@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Bob Duke  
1730 Winbury Drive  
Midlothian, VA 23114  
8044260111

**From:** Jacqueline Walsh <jacquelineawalsh@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jacqueline Walsh  
1015 N Calvert St. #2  
Baltimore, MD 21202  
410 3229857



**From:** Elizabeth Mello <emello@alumni.unh.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:40 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elizabeth Mello  
9 Dulcies Point Road  
Kingston, NH 03848  
603-661-7794

**From:** Wayne A Hogan DC <WayneHoganDC@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:51:57 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Wayne A Hogan DC  
905 Hudson River Road  
Mechanicville, NY 12118  
518-664-5281

**From:** Nicole Breedlove <nicolebreedlove@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nicole Breedlove  
6805 N. Borthwick Ave.  
Silver Spring, MD 20910

**From:** william toner <wtoner@twcny.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:14 PM

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Thank you for this opportunity to comment and I look forward to your response.

william toner  
9 highland ave  
PO Box 72  
mcgraw, NY 13101  
607 836 6032



**From:** Diana Lavery <diana.c.lavery@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:16 PM

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Thank you for this opportunity to comment and I look forward to your response.

Diana Lavery  
Willard Ave  
Chevy Chase, MD 20815  
949-244-9713

**From:** David Laux <dlaux3882@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:17 PM

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Thank you for this opportunity to comment and I look forward to your response.

David Laux  
4613 Randolph Dr  
Annandale, VA 22003

**From:** Lourdes Inoa <liset1099@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:19 PM

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Thank you for this opportunity to comment and I look forward to your response.

Lourdes Inoa  
8 overhill rd  
verona, NJ 07044  
718-644-7559

**From:** Jane Murphy <jmurphy7977@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jane Murphy  
179 South Conger Avenue  
Congers, NY 10920  
845-268-9175



**From:** Rev.Antoinette Pezet <godisblue@gwu.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:30 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rev.Antoinette Pezet  
c/o Circle of Hope, A Special Ministry of MCC  
POB 1671  
Portland, ME 04104  
207 774 7029

**From:** Howard Urbach <buddy\_vol@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:41 PM

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Thank you for this opportunity to comment and I look forward to your response.

Howard Urbach  
223 Nansemond St.  
Petersburg, VA 23803-3705

**From:** Bianca Koscielski <bianca.kosciel@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Bianca Koscielski  
126 Windbrooke Cir  
Gaithersburg, MD 20879

**From:** Pam Morris <pamdmorris@coresound.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:52:55 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Pam Morris  
222 Davis Lane  
Smyrna, NC 28579  
252-269-5020



**From:** Derek Meyer <dmmeier@email.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Derek Meyer  
3103 Circle Hill Road  
3103 Circle Hill Road  
Alexandria, VA 22305  
(703) 342-6991

**From:** JAMES SCHMIDT <jamespschmidt@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

JAMES SCHMIDT  
271 SO PROSPECT ST - STE 11  
HAGERSTOWN, MD 21740

**From:** Shirley Stotko <sstotko@udel.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:09 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Shirley Stotko  
90 Bluebird Lane  
90 Bluebird Lane  
Port Deposit, MD 21904  
410-478-9480

**From:** Steve Gilman <stevegilman@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Steve Gilman  
1  
Stillwater, NY 12170



**From:** Carl Klein <carl\_klein@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carl Klein  
12377 Big Tree Rd  
12377 Big Tree Rd  
Wales Center, NY 14169  
716-652-7805

**From:** Linda Lowell <lindalowellk0x@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Linda Lowell  
229 Cedar Lane  
Ossining, NY 10562  
914-923-2985

From: Nelson J Mendoza <nelson108@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:53:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nelson J Mendoza  
402 Pershing Road  
Raleigh, NC 27608  
9197609220

From: Jarett Gilbert <jarett\_gilbert@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:53:33 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jarett Gilbert  
725 4th Ave P5  
Brooklyn, NY 11232



**From:** Sascha Bollag <sbollag@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:34 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sascha Bollag  
7755 Hilliard Ln  
Concord, NC 28025  
919.923.5973

**From:** Mary Woodburn <kelso.mary@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:35 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mary Woodburn  
74 Church St.  
New Paltz, NY 12561  
845-255-2864

**From:** James Thomas <jmichaelthomas2001@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

James Thomas  
5900 Hathaway Lane  
Chapel Hill, NC 27514  
9199494314

**From:** Sascha Bollag <sbollag@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:40 PM

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Thank you for this opportunity to comment and I look forward to your response.

Sascha Bollag  
7755 Hilliard Ln  
Concord, NC 28025  
919.923.5973



**From:** richard lotterman <diceman1077@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

richard lotterman  
30 village green  
east longmeadow, MA 01028  
413-525-2068

**From:** Deborah Limanek <heroness@bellatlantic.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:43 PM

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Thank you for this opportunity to comment and I look forward to your response.

Deborah Limanek  
588 Hill St  
Whitinsville, MA 01588

**From:** Cheryl Dzubak <cadzubak@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:47 PM

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Thank you for this opportunity to comment and I look forward to your response.

Cheryl Dzubak  
69 Elton Avenue  
69 Elton Avenue  
Yardville, NJ 08620  
609 584-1506

**From:** Rheta Johnson <rheta.johnson@me.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rheta Johnson  
8033 Cobble Creek Cir  
Potomac, MD 20854  
240-403-7113



**From:** Gregory Light <gjlight0853@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:56 PM

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Thank you for this opportunity to comment and I look forward to your response.

Gregory Light  
50 Melody Lane  
Plattsburgh, NY 12901

**From:** Sherri Walters <Sherri@thelittlehousenh.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:53:58 PM

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Thank you for this opportunity to comment and I look forward to your response.

Sherri Walters  
325 Richmond Rd  
fitzwilliam, NH 03447

From: JANIS KIRK <JKIRK@DICORP.COM>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:54:01 PM

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Thank you for this opportunity to comment and I look forward to your response.

JANIS KIRK  
1233 CONOWINGO RD  
BEL AIR, MD 21014

**From:** Oren Gordin <orengordin@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:04 PM

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Thank you for this opportunity to comment and I look forward to your response.

Oren Gordin  
2299 E. 13th St.  
225 Church St.  
Brooklyn, NY 08879  
9175431245



**From:** Mary Muchui <muchui@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mary Muchui  
404 Boyd Avenue  
Takoma Park, MD 20912

From: Robyn Sharpe <missrobyn@rcn.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:54:10 PM

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Thank you for this opportunity to comment and I look forward to your response.

Robyn Sharpe  
110 Cornell Street  
Boston, MA 02131  
6173270735

**From:** Stanley Brajer <s0603262@monmouth.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:11 PM

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Stanley Brajer  
104 Oben Dr.  
Landing, NJ 07850

**From:** T. Alex Shimada-Brand <ashimada@hms.harvard.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

T. Alex Shimada-Brand  
35 Roseway Street  
Boston, MA 02130-0219



**From:** Charles Shackelford <shackman429@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Charles Shackelford  
1208 Bevis Drive  
Charlotte, NC 28209  
7045253505

**From:** Norman Krebs <normkrebs@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:34 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Norman Krebs  
207 East Park Street  
Albion, NY 14411  
15855894518

**From:** Deja Lizer <dayjah219@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Deja Lizer  
2 Melody lane  
Asheville  
Asheville, NC 28801  
8285459710

**From:** sarah-marie belcastro <smbelcas@toroidalsnark.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares. Introducing a plan for monkfish could reduce jobs in coastal communities reliant on a diverse fishing fleet and active ports.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

sarah-marie belcastro  
278 Bay Road  
Hadley, MA 01035



**From:** Martha Colella <marthacolella@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Martha Colella  
31 Roma Street  
Meadowbrook Dr  
Bristol, RI 02809  
401 524 6992

From: Frank Santangelo <v2schnieder@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:54:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Frank Santangelo  
17 Struyk Ave 2nd Fl  
2nd Fl  
Prospect Park, NJ 07508

**From:** Susan McClare <suemccclare@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Susan McClare  
324 Kirkwood Rd  
Millersville, MD 21108  
410-987-1789

**From:** James Welms <jwelms@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:54 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

James Welms  
2601 Bradwell Ct.  
2601 Bradwell Ct.  
Parkville, MD 21234-1518



**From:** Caren Johnson <carenjohnson@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Caren Johnson  
226 huntingtonbay road  
huntington, NY 11743

**From:** Rachel Felver <rfelver@mailworks.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:54:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Rachel Felver  
707 Hammond Branch Road  
601 Burtons Cove Way, MD 21401

**From:** patricia harriss <pharriss@embarqmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:00 PM

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Thank you for this opportunity to comment and I look forward to your response.

patricia harriss  
135 Swan Lane  
angier, NC 27501

**From:** Michael Grookett <mikegrook@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Michael Grookett  
108 five crown royal  
Marlton, NJ 08053  
8562616618



**From:** Mari Thulin <marithulin@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mari Thulin  
1011 Second Street  
Northfield, NJ 08225

**From:** Angelina LoCascio <angelina\_7882@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Angelina LoCascio  
371 Hudson Ave Apt 3B  
Albany, NY 12210

**From:** Richard Rheder <wellredwolf@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Richard Rheder  
P.O.B. 931  
Woodstock, NY 12498  
111-111-111

**From:** Kathryn Reilly <kathryn\_reilly@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:13 PM

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Thank you for this opportunity to comment and I look forward to your response.

-Kathryn Reilly  
Cambridge, MA

Kathryn Reilly  
36 Fairfield St  
Cambridge, MA 02140  
617-714-3254



**From:** Jane Davidson <romjulcat@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:13 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jane Davidson  
435 Valley View Road  
Englewood, NJ 07631  
201-569-8370

From: Molly Weigel <mweigel@ets.org>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:55:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Molly Weigel  
8 Diverty Road  
Pennington, NJ 08534

**From:** Richard Heaning <bumper8220@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Richard Heaning  
12 Seneca dr  
12 Seneca Dr  
No Massapequa, NY 11758-1026  
516-796-6190

**From:** Carmelle Malerich <cmalerich@centurylink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carmelle Malerich  
250 G.B.Kegley Dr.  
Bland, VA 24315



**From:** TOM FULTON <TOMAFJR@AOL.COM>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

TOM FULTON  
17 IROQUOIS ST.  
BLACK MOUNTAIN, NC 28711  
8286691334

**From:** Elizabeth Saenger <saengereb@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:55 PM

I am very much opposed to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Elizabeth Saenger  
702 Hall St.  
Mamaroneck, NY 10543

**From:** Pame Swallow <pswallow@nac.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:55:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Pame Swallow  
75 Summer Road  
Flemington, NJ 08822  
908-788-7884

**From:** Alex Balboa <alexbalboa\_us@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Alex Balboa  
1996 Waverly Drive  
Bel Air, MD 21015



**From:** Catherine Bell <endlessferrets@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Catherine Bell  
156 Columbia Dr.  
Amherst, MA 01002  
Phone

**From:** David Webb <david.1.webb@dartmouth.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:06 PM

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Thank you for this opportunity to comment and I look forward to your response.

David Webb  
2 Butternut Lane  
Hanover, NH 03755

**From:** Alan Bromborsky <abrombo@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:15 PM

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Thank you for this opportunity to comment and I look forward to your response.

Alan Bromborsky  
12435 Kemp Mill Road  
Silver Spring, MD 20902  
301-625-5951

From: Abigail Beutler <violabbyl@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:56:15 PM

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Thank you for this opportunity to comment and I look forward to your response.

Abigail Beutler  
6 Guilford Lane  
Nashua  
Nashua, NH 03063  
603 554 6164



**From:** laura braggiotti <ljbe@frontiernet.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

laura braggiotti  
160 linden st  
rochester, NY 14620  
5854736122

**From:** Carol Gillingham <edncees\_temp@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carol Gillingham  
800 E 5th St  
Washington, NC 27889  
252 946 5721

**From:** Rich Caloggero <rjc@mit.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:30 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rich Caloggero  
70 Marshall Street  
Medford, MA 02155

**From:** Terry Carlson <rtcat67@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:38 PM

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Thank you for this opportunity to comment and I look forward to your response.

Terry Carlson  
4 pluto lane  
PERSON\_COLLECTION\_ASSN<>address2  
nashua, NH 03062  
7742591304



**From:** jeff nach <momslikeuchoosejeff@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:40 PM

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Thank you for this opportunity to comment and I look forward to your response.

jeff nach  
159 madison ave  
clifton, NJ 07011  
973-405-1123

**From:** Beth DRaper <beth@capehealingarts.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:45 PM

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Thank you for this opportunity to comment and I look forward to your response.

Beth DRaper  
120 Beechtree Drive  
1275 Millstone Rd.  
Brewster, MA 02631  
508-896-7117

**From:** Robert Bermudes <boboncapcod@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:56:46 PM

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Thank you for this opportunity to comment and I look forward to your response.

Robert Bermudes  
96 Far Fields Rd.  
96 Far Fields Rd.  
Brewster, MA 02631

**From:** Alan Papskun <alan@papskun.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:06 PM

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Thank you for this opportunity to comment and I look forward to your response.

Alan Papskun  
40 Glendale Rd.  
40 Glendale Rd.  
Stockbridge, MA 01229-0084  
413 274-0123



**From:** Nancy McLure <nlmclure@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:15 PM

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Thank you for this opportunity to comment and I look forward to your response.

Nancy McLure  
9 Bodnar St  
9 Bodnar St  
Bernardsville, NJ 07924  
9082049572

**From:** P. Blevins <pbsantafe@tds.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:16 PM

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Thank you for this opportunity to comment and I look forward to your response.

P. Blevins  
Small Rd.  
Phillips, ME 04966

**From:** Dale Kurtz <dkurtz1162@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:17 PM

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Thank you for this opportunity to comment and I look forward to your response.

Dale Kurtz  
750 Grand Concourse  
Bronx, NY 10451

**From:** Mary Xakellis Chapman <thelancientone@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:21 PM

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Mary Xakellis Chapman  
6B Ridge Road  
Townhouse B  
Greenbelt, MD 20770-2961



**From:** Lesley Mowat <lesleymowat@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:21 PM

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Lesley Mowat  
14 Brampton Way  
Hamilton, NJ 08690

**From:** annette varady <annettevarady@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:22 PM

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annette varady  
po box 24  
jewett, NY 12444

From: Ellen Emerson <eemerson@wcvt.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:57:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

Ellen Emerson  
29 Horton Ave  
29 Horton Ave  
Middletown, NY 10940  
(845) 342-0315

From: John Robertson <robertson@bburglaw.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:57:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

John Robertson  
1213 Redbud Road  
Blacksburg, VA 24060



**From:** Casii Dodd <passingthymeherb@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:30 PM

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Casii Dodd  
19 E. Pennsylvania Ave.  
Walkersville, MD 21793  
443-421-1408

**From:** Hope-Whitney Davis <hdavis@risd.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:35 PM

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Hope-Whitney Davis  
34 Harbor View Ave  
Bristol, RI 02809  
401-254-0711

**From:** Barry Zuckerman <b\_zuckerman@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:42 PM

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Barry Zuckerman  
1 Old Anvil Lane  
1 Old Anvil Lane  
Middletown, NY 10940  
9144431485

**From:** Xyra Harper-Cann <xyra@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:46 PM

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Xyra Harper-Cann  
18579 Dettington Court  
Leesburg, VA 20176



**From:** eric weissberg <eweissberg@hvc.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:52 PM

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eric weissberg  
60 boggs hill  
woodstock ny  
woodstock, NY 12498  
845 679 9073

**From:** Michelle O'Gorman <empresslola@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:57:53 PM

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Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Michelle O'Gorman  
93 E Albany St  
Oswego, NY 13126-3341  
3153437153

**From:** Lois White <lois.white@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lois White  
1299 Williams Drive  
Shrub Oak, NY 10588

**From:** Linda Kelly-Keener <linda.keener@caritaschristi.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:09 PM

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Thank you for this opportunity to comment and I look forward to your response.

Linda Kelly-Keener  
22 Bradbury Street  
Allston, MA 02134  
617 254 2887

**From:** joe neri <jneri2754@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:16 PM

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Thank you for this opportunity to comment and I look forward to your response.

joe neri  
8920 dayton ave  
north beach, MD 20714



**From:** Dennis DeMarinis <denjwu@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Dennis DeMarinis  
1149 Victoria Street  
New Bedford, MA 02745

**From:** Joseph Manicone <joman1@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:35 PM

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Thank you for this opportunity to comment and I look forward to your response.

Joseph Manicone  
408 Chatfield Dr  
Chatfields Dr  
Pompton Plains, NJ 0

**From:** Fred Lovine <fred.lovine@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Fred Lovine  
9 Lawrence St.  
Wilmington, MA 01887  
9786580740

**From:** Mollie Mayfield <mollie.mayfield@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mollie Mayfield  
7500 New Sharon Ch Rd  
Rougemont, NC 27572

From: robin blier <rockinrobinv@hvc.rr.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:58:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

robin blier  
271 ralph vedder rd  
271 ralph vedder rd  
saugerties, NY 12477  
845 247-0007



**From:** Elizabeth Faraone <elizabethfaraone@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:52 PM

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Thank you for this opportunity to comment and I look forward to your response.

Elizabeth Faraone  
836 Carlton Avenue  
Apartment 3  
Plainfield, NJ 07060  
917-771-5983

**From:** sam. bros <shichimeitozoku@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:58:58 PM

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Thank you for this opportunity to comment and I look forward to your response.

sam. bros  
850 old n. ocean ave.  
patchogue, NY 11772

**From:** Joe Rocha <Rochaj100@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Joe Rocha  
100 Green St#402  
Same  
Fall River, MA 02720-2216  
508-567-3026

**From:** Anne Bliss <nybliss@me.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Anne Bliss  
12 Gould St  
East Hampton, NY 11937  
631-324-7355

**From:** Nicole Zanetakos <nickiz4154@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nicole Zanetakos  
689 Chestnut Street  
Kearny, NJ 07032  
201 9982132



**From:** theresa kisielewski <stpkis@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:25 PM

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Thank you for this opportunity to comment and I look forward to your response.

theresa kisielewski  
112 briarwood lane  
hendersonville  
hendersonville, NC 28791  
828-697-6698

**From:** Sylvia Golbin <SylviaGolbin@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sylvia Golbin  
PO Box 394  
Mahwah, NJ 07430  
201-787-0920

**From:** Carmin Ruggiero <carminruggiero@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:36 PM

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Thank you for this opportunity to comment and I look forward to your response.

Carmin Ruggiero  
1225 Martha Custis Drive,  
Alexandria, VA 22302  
571-970-2614

From: Evan Stover <stover@hvc.rr.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:59:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

Evan Stover  
617 Conifer Lane  
Kingston, NY 12401  
845-339-0072

**From:** Charles Kendall <kendallce@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:50 PM

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Thank you for this opportunity to comment and I look forward to your response.

Charles Kendall  
PO Box 665  
Redwood, NY 13679  
315-836-3839



**From:** Jon Prochovnick <jprochovnick@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 12:59:56 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jon Prochovnick  
136 Crossing Way  
Lindenwold, NJ 08021  
484-764-6174

From: Chelsea Saada <joisygurl182@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 12:59:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Chelsea Saada  
2207 Herbertsville rd  
Point Pleasant Beach, NJ 08742

**From:** Susan Larrabee <suelarrabee2000@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:00:01 PM

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Thank you for this opportunity to comment and I look forward to your response.

Susan Larrabee  
PO Box 308  
Yarmouth Port, MA 02675  
508-362-9420

**From:** Nancy & Joseph St John <njb.stj@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:00:11 PM

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Thank you for this opportunity to comment and I look forward to your response.

Nancy & Joseph St John  
PO Box 533  
Brett Rd  
Monterey, MA 01230

**From:** David Laski <dave.laski@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:00:14 PM

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Thank you for this opportunity to comment and I look forward to your response.

David Laski  
148 1st Ave., 2nd fl.  
Manasquan, NJ 08736-3354  
7327403341



**From:** Lisa Schaw <sales@nfwss.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:00:20 PM

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Thank you for this opportunity to comment and I look forward to your response.

Lisa Schaw  
155 Lake Ave  
Riverhead, NY 11901

From: Stephen Graham <stedo1976@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:00:39 PM

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Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Stephen Graham  
3361 5th Street  
Apt. 5A  
Oceanside, NY 11572  
917-686-5184

**From:** Janice Pumphrey-Willison <spinnwebe@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:00:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Janice Pumphrey-Willison  
707 W. 33rd St.  
Baltimore, MD 21211  
410.366.7722

**From:** K. Griffin <kapase@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

K. Griffin  
11419 Willows Green Way  
Glen Allen, VA 23059

From: John Stirk <jstirk@rochester.rr.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:01:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

John Stirk  
2864 Gaines Road  
Albion, NY  
Albion, NY 14411-9026  
585 589-4091



**From:** Sharon Garlena <sharon.garlena@tatrc.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:06 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sharon Garlena  
1054 Patchel Street  
Street  
Frederick, MD 21702

**From:** Cari Gardner <cariyogi@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Cari Gardner  
44 Clarewood Drive  
Hastings on Hudson, NY 10706

**From:** Marilyn Pettinga <marilyn\_pettinga@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

I write from the perspective of being the neice and great-neice of small-scale fishermen who made their living from the sea. My family have been fishermen and farmers for over 200 years. This plan would have a disastrous effect on small-scale fisherman.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

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Thank you for this opportunity to comment and I look forward to your response.

Marilyn Pettinga  
303 Wood Street  
Ithaca, NY 14850-5309  
6072722664

**From:** Joy Metcalf <rosawoodsii@bluestreakme.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions. I have to wonder if Catch shares was written by large companies to force out the smaller fishermen, because the result is the same.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Joy Metcalf  
23 Cobb Meadow Lane  
23 Cobb Meadow Lane  
Northport, ME 04849-3465  
207-338-0124

**From:** Neil Freson <nfreson@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Neil Freson  
26 Lane Bitternell  
Henrietta, NY 14467  
5853349360



From: Janet Grossman <swellideas@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:01:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Janet Grossman  
414 Main St  
414 Main St  
Sag Harbor, NY 119632956  
6317257216

**From:** Colette LaDue <Colettedre@frontiernet.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Colette LaDue  
334 Dings Hollow Rd.  
334 Dings Hollow Road  
Whitney Point, NY 13862  
6076922279

**From:** kent swenson <kswenson42@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:58 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

kent swenson  
225 dennis ln  
225 dennis lane  
franklin, NC 28734  
828 332 1090

**From:** Mali Hinesley <guacamali@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:01:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mali Hinesley  
44 Pleasant  
Gardiner, ME 04345

From: Kit Mason <kitmason@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:02:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kit Mason  
1508 Sanford Rd  
Silver Spring, MD 20902



**From:** Annette Overstreet <starchild6@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:02:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Annette Overstreet  
202 Shady Oak Lane  
202 Shady Oak Lane  
Forest, VA 24551  
434-525-6828

**From:** Robert Apperson <yankee\_rob2002@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:02:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Robert Apperson  
1311 Lorimer road  
Raleigh, NC 27606  
919-8526814

**From:** Gina Gilberto <girosebud1@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:02:29 PM

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Thank you for this opportunity to comment and I look forward to your response.

Gina Gilberto  
38 Clay Pit Rd  
Remsenburg, NY 11960

From: Shelby Carland <trelby@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:02:34 PM

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Thank you for this opportunity to comment and I look forward to your response.

Shelby Carland  
154 Chestnut Creek Rd.  
154 Chestnut Creek Rd.  
Candler, NC 28715  
828-670-8283

**From:** Patrick Durkin <patrick@thewellnessenterprise.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:02:37 PM

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Thank you for this opportunity to comment and I look forward to your response.

Patrick Durkin  
20 state park road  
20 State Park Road  
Hull, MA 02045  
7819251341



**From:** Theresa Lam <Therlam@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:03:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Theresa Lam  
44 Farms Road  
East Brunswick, NJ 08816  
732-967-0133

From: Maryam Shansab <Maryam.Shansab@tufts.edu>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:03:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Maryam Shansab  
205 Walden St  
Cambridge, MA 02140

From: Don Doornbos <dooorn@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:03:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Don Doornbos  
2466 State Route 12  
2466 State Route 12  
Chenango Forks, NY 13746  
607-765-6597

**From:** Sara Genthner <bayhee@webtv.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:03:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sara Genthner  
111 Bassett Brook Drive  
Easthampton, MA 0127-1096  
(413) 527-1425

**From:** Deborah Duley <debaduley@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:03:49 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Deborah Duley  
7910 Orange Drive  
Lusby, MD 20657  
3011212



From: Maureen Barillaro <lucyneptune@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:03:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Maureen Barillaro  
Main St  
Somerville  
Somerville, MA 02143  
617-555-5555

**From:** m brinkley <marilyncdb@wildblue.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:04:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

m brinkley  
1801 shaffer mill rd  
mount airy, MD 21771

**From:** Erinn Burke-Hecker <ErinnRN28@Msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:04:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Erinn Burke-Hecker  
796 Flowerdale Dr  
Seaford, NY 11783

**From:** David Dellea <davidd@chathammarketplace.coop>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:04:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

David Dellea  
4433 ELG Road  
Efland, NC 27312  
9195630941

From: Annie Saha <Annielittlepine@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:05:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Annie Saha  
146 plains rd  
New Paltz, NY 12562



From: Carmine Gorga <cgorga@jhu.edu>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:05:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carmine Gorga  
87 Middle Street  
Gloucester, MA 01930  
978.283.5926

**From:** Randi Klein <randi@crocker.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:05:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Randi Klein  
95 Maynard Rd.  
Northampton, MA 01060  
413-587-7995

**From:** Janet Heatwole <janet@ajheatwole.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:05:35 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Janet Heatwole  
11301 Moxley Rds  
DAMASCUS, MD 20872  
301-253-8808

**From:** Cheryle Streb <cstrebl@rochester.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:05:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Cheryle Streb  
1249 Latta Road  
Apt 5  
Rochester, NY 14612  
585-581-0198

**From:** Dorothy Ciak <dfciak@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Dorothy Ciak  
59 School Street  
Northborough,, MA 01532  
508-393-5491



**From:** Laurie Nigro <Celtchik.ln@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:02 PM

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Thank you for this opportunity to comment and I look forward to your response.

Laurie Nigro  
131 Brook St  
Riverhead, NY 11901

**From:** Peter Anderson <panderso@maine.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Peter Anderson  
45 forest Road  
Cape Elizabeth, ME 04107  
207 799-3977

**From:** Edina Molnar <edinamolnarus@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Edina Molnar  
Wall St  
1 Wall St 6/D  
Fort Lee, NJ 07024  
201-482-4301

**From:** Jane Vieira <janevieira@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jane Vieira  
75 Atlantic St.  
New Bedford, MA 02740

**From:** Brother Roger Croteau, CSC <croteau\_roger@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Brother Roger Croteau, CSC  
85 Overlook Circle  
New Rochelle, NY 10804-4501



**From:** Charlene maker <cmaker@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:06:47 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Charlene maker  
125 S. of Commons Rd.  
Little Compton, RI 02837

**From:** Rodney Roberts <rodneybradfordroberts@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Rodney Roberts  
40 Howard Street  
Portsmouth, NH 03801

**From:** Rebecca Yaffe <rebecca@yaffemays.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:05 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rebecca Yaffe  
258 Shelburne Line Rd.  
Colrain, MA 01340

**From:** Cheryl Lee <mdcheryl@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:06 PM

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Thank you for this opportunity to comment and I look forward to your response.

Cheryl Lee  
7711 Sarabee Drive  
274445  
Preston, MD 21655  
4104790007

**From:** Jon Albitz <jalbitz@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:10 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jon Albitz  
278 Riverside Drive  
Florence, MA 01062



**From:** Dennis Shaw <dennisgshaw@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:15 PM

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Thank you for this opportunity to comment and I look forward to your response.

Dennis Shaw  
12364 Harvey RD  
Clear Spring, MD 21722

**From:** Devin Henry <mrdsir@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:18 PM

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Devin Henry  
PO Box 413  
Nichols, NY 13812  
867-5309

**From:** Mona Naimark <mamaangel33@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mona Naimark  
62 N. Prospect St  
Amherst, MA 01002  
4132568627

**From:** charlie mccullagh <c.mtoole@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:35 PM

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Thank you for this opportunity to comment and I look forward to your response.

charlie mccullagh  
311 river rd  
311 river rd  
red bank, NJ 07701  
732 530 6332

**From:** Tracy Liberty <tracyliberty@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:45 PM

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Thank you for this opportunity to comment and I look forward to your response.

Tracy Liberty  
45 Rennie Lane  
Brownfield, ME 04010



**From:** Becky Ceartas <beckyceartas@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:46 PM

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Thank you for this opportunity to comment and I look forward to your response.

Becky Ceartas  
455 fair Oaks circle  
Chapel Hill, NC 27516  
9199324363

**From:** Tom Wroblewski <twroblewsk@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:46 PM

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Thank you for this opportunity to comment and I look forward to your response.

Tom Wroblewski  
17 Fairway Dr  
Manorville, NY 11949

**From:** Christopher Burkat <chrisburkat@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:07:48 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Christopher Burkat  
57 Rockledge Road, #20D  
BRONXVILLE, NY 10708

From: kevin talbot <kpt421@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:07:49 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

kevin talbot  
112 greenwood drive  
north babylon, NY 11703  
631-275-9489

**From:** Toby Higgins <thiggins@endicott.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:08:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Toby Higgins  
1092 Washington St  
Gloucester, MA 01930



From: Sandra Eisenring <suissesnow@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:08:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sandra Eisenring  
231 Shilings Chase Drive  
Cary, NC 27518

**From:** Brittany Walsh <bwalsh12@umd.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:09:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Brittany Walsh  
3959 Salem Bottom Rd  
Westminster, MD 21157  
4433401670

**From:** Christine King <slacker\_cricket@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:09:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Christine King  
146 College Highway # 7  
146 College Highway #7  
Southampton, MA 01073  
413-527-9149

**From:** elaine riesenberg <eriesenberg@myfairpoint.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:09:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

elaine riesenberg  
122 neal Street  
portland, ME 04102  
207-772-7053

**From:** Susannah Knox <susannah.knox@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:09:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Susannah Knox  
201 NC 54, Apt. 107  
Carrboro, NC 27510



**From:** Cindi Rauert <cindirauert@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:09:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Cindi Rauert  
2604 A S. Arlington Mill Dr.  
2604 A S. Arlington Mill Dr.  
Arlington, VA 22206  
703 717-9013

**From:** Gary Nason <ganason@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Gary Nason  
4 Begonia rd  
Ricky Point, NY 11778

**From:** Gail Weston-Roberts <weston-roberts@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Gail Weston-Roberts  
26 Western Ave.  
26 Western Ave.  
Natick, MA 01760

**From:** Emily Smith <emily.smith410@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Emily Smith  
85 Elm St. #1R  
85 Elm St.  
Worcester, MA 01609  
508-713-7854

**From:** Rusty Simpson <rusty.simpson@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Rusty Simpson  
1523 Marshall St  
Baltimore, MD 21230-4503  
410-527-9999



**From:** Claiborne Smisson <clai\_s@mindspring.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:33 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Claiborne Smisson  
P. O. Box 12253  
Apt. 2  
Raleigh, NC 27605-2253  
919-821-7382

**From:** Daniel Greenburg <dan@dangreenburg.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Daniel Greenburg  
645 N. Broadway, Apt. 16  
645 N. Broadway, #16, Hastings-on-Hudson, NY 10706  
Hastings on Hudson, NY 10706  
9144780382

From: Peggy Gannon <keepsondancing@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:10:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Peggy Gannon  
97 Madawaska Rd.  
Palmyra, ME 04965

**From:** Myra Hogan <myrahogan@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:10:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Myra Hogan  
1609 Sutton Drive  
Raleigh, NC 27605

**From:** Adero Solomon <adeslmn@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:11:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Adero Solomon  
801 CURIE ROAD  
NORTH BRUNSWICK, NJ 08902  
7329930402



**From:** Jacqueline Lessard <kre8peas@embarqmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:11:23 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jacqueline Lessard  
392 B Minor Ridge Road  
Charlottesville, VA 22901  
4349730247

**From:** Sandra Shumate <s.shumate@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:11:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares need to be thrown in the trash and burned and never brought up again. Please do not implement such a program that puts small businesses out-of-business while creating monopolies of large corporate giants that dictate to the American people.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Sandra Shumate  
5510 Boyers Mill Rd  
New Market, MD 21774  
301-865-3213

**From:** Joy Brown <joyflurybrown@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:11:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

Joy Brown  
29 East Mill Road  
Northfield, NJ 08225

From: Sharleen Kapp <Cookiekapp@comcat.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:11:36 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sharleen Kapp  
7 Upper Church Street  
7 UPPER CHURCH STREET  
West Springfield, MA 01089-3187

**From:** Michael A. Bratt <mabratt@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:12:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Michael A. Bratt  
26 Charena Rd  
Wayland, MA 01778



From: carol carne <ccarne43@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:12:21 PM

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Thank you for this opportunity to comment and I look forward to your response.

carol carne  
1220 tugwell drive  
1220 tugwell drive  
baltimore, MD 21228  
410-747-0026

**From:** Walter von Schonfeld <wkvs@nc.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:12:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Walter von Schonfeld  
2002 Wilshire Dr  
Durham, NC 27707  
919 493 3873

From: caleb scott <d\_random@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:12:50 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

caleb scott  
3508 Brevard St. Apt. B  
Greensboro, NC 27407  
336-339-1271

**From:** Anita McCollum <someltakemeaway@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:12:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Anita McCollum  
1505 Yacht Ave  
Cape May, NJ 08204  
6099726783

**From:** Thomas Bengaff <tbengaff@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:13:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Thomas Bengaff  
81 Rivervale Road  
River Vale, NJ 07675  
2017229537



**From:** Lydia Kennedy <lydiakennedy@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:13:09 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lydia Kennedy  
102 Gould Hill Road  
102 Gould Hill Road  
Greenfield, NH 03047  
603 831-4994

**From:** Lucie Brown <deskoflucie@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:13:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lucie Brown  
415 Croton Ave  
Cortlandt Manor, NY 10567

**From:** Janet Tice <starjet@mindspring.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:13:49 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Janet Tice  
310 Umstead  
Chapel Hill, NC 27516

**From:** John Page <jpfiddler@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:13:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

John Page  
29 Denny Lane  
Canton, NC 28716  
828.246.4949

**From:** Maryalice Webb <maryalicewebb@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:14:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Maryalice Webb  
63 Felch Road  
Natick, MA 01760  
508-651-0650



**From:** sandy donahue <sekld@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:14:33 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

sandy donahue  
wordsworth st  
portland, ME 04103

**From:** Amy Agigian <agigian@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:15:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Amy Agigian  
33 Corinthian Road  
33 Corinthian Road  
Somerville, MA 02144-1823  
617-666-1373

**From:** Susan Brody <baerhealth@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:15:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Susan Brody  
208 Lameshur Ln  
208 Lameshur Ln  
Monroe, NC 28110  
704 698 0202

**From:** Harold T. Hodes <hth3@cornell.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:15:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Harold T. Hodes  
102 Homestead Terrace  
Ithaca  
Ithaca, NY 14850-6218  
607 255-6821

**From:** Carmen Alvarado <alvaradoc@cherokee-inc.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:15:32 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carmen Alvarado  
9872 Burke Pond Court  
Burke, VA 22015  
703-229-5386



**From:** Barbara Costa <costange@rcn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:15:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Barbara Costa  
26 Woodland St.  
26 Woodland Street  
Arlington, MA 02476  
781-646-2116

From: Nancy Hooper <nan12563@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:16:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nancy Hooper  
P.O. Box 57  
Patterson, NY 12563

**From:** Eileen Mielenhausen <membership@bluehill.coop>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Eileen Mielenhausen  
502 Newbury Neck Rd.  
Surry, ME 04614

**From:** Mo Kafka <m.kafka@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:23 PM

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Thank you for this opportunity to comment and I look forward to your response.

Mo Kafka  
Livingston Ave  
Livingston Ave  
New Brunswick, NJ 08901

**From:** peter mc farland <gundalowg@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:27 PM

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Thank you for this opportunity to comment and I look forward to your response.

peter mc farland  
46 stalkers way  
jefferson, ME 04348



**From:** Deborah Blake <magicmysticminerva@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:43 PM

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Thank you for this opportunity to comment and I look forward to your response.

Deborah Blake  
621 Charlotte Crk Rd  
Oneonta, NY 13820

**From:** Bonnie Wagner-Westbrook <bonnie.westbrook@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:45 PM

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Thank you for this opportunity to comment and I look forward to your response.

Bonnie Wagner-Westbrook  
7 Burlinghoff Lane  
Lebanon, NJ 08833  
Lebanon, NJ 08833  
7327358345

**From:** Jonathan Alexander <jexander@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jonathan Alexander  
4213 Jefferson ST.  
Hyattsville, MD 20781

From: Yahara Katzeff <ystarmagic@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:16:58 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Yahara Katzeff  
9 Grove Street  
Turners Falls, MA 01376  
413 8639199

**From:** Stephen Piela <stephen\_piel@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:16:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Stephen Piela  
45 North St,  
Apt.#1  
Saco, ME 04072



**From:** John Rafferty <Jbrooftree@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:17:03 PM

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Thank you for this opportunity to comment and I look forward to your response.

John Rafferty  
Po box 359  
Huntington, NY 11743  
6312232290

**From:** Mona Dube <dubem@salve.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:17:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Many fishermen in my state are being pushed out of business because of catch limits on other species. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Mona Dube  
9 Warner Place  
Newport, RI 02840  
401.842.0181

**From:** scott williams <casketman45@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:17:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

scott williams  
2435 Lords Hill Rd.  
Lafayette, NY 13084

From: Hillary G. Buckingham <hg2bee@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:17:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Hillary G. Buckingham  
173 Warburton Avenue  
173 Warburton Avenue  
Hastings on Hudson, NY 10706  
9144784644

**From:** David Goldsmith <eohdfg@gwumc.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:17:53 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

David Goldsmith  
9504 Crosby Road  
Silver Spring, MD 20910



**From:** Shannon Harper <sharper91@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:18:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Shannon Harper  
511 Old Mill Rd  
511 Old Mill Rd  
Castle Hayne, NC 28429  
(910) 297-5502

From: Jo Davis <enfpj53@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:18:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jo Davis  
3809 Timber Ridge Rd,  
3809 Timber Ridge Rd,  
Midlothian, VA 23112  
804 744 6533

From: william siverson <whsiverson@att.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:18:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

william siverson  
18 river street  
18 river street  
chatham, NY 12037  
5183920734

**From:** Raphaela van Spaandonk <raphaela@frontiernet.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:18:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Raphaela van Spaandonk  
200 Round Pond Road  
Smithville Flats, NY 13841  
607-656-9203

From: Joseph Nardone <jsphnardone@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:18:40 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Joseph Nardone  
621 Market St.  
Newark, NJ 07105-3645  
973-817-8396



**From:** Dane Bowen <dbowen5@carolina.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:18:50 PM

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Thank you for this opportunity to comment and I look forward to your response.

Dane Bowen  
8740 Blair Rd.  
Mint Hill, NC 28227-7640

From: debbi watson <tannnude@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:19:03 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

debbi watson  
364 westwood ave #86  
#86  
long branch, NJ 07740

**From:** Patricia Neumann <wyld24@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:19:03 PM

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Thank you for this opportunity to comment and I look forward to your response.

Patricia Neumann  
89 Church Street  
89 Church St  
Tarrytown, NY 10591

From: KATHY UPHAM <KUPHAM90@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:19:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

KATHY UPHAM  
56 HILLTOP COURT  
CARMEL, NY 10512  
8452164076

**From:** George Toleson <gtoll@charter.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:19:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

George Toleson  
26 Chateau Pl.  
Asheville, NC 28805  
828-281-1166



**From:** Miriam Pinheiro <miriam.pinheiro@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:19:23 PM

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Thank you for this opportunity to comment and I look forward to your response.

Miriam Pinheiro  
4409 Yucca ST.  
Beltsville, MD 20705  
240-468-5227

**From:** Richard Warren <richard-warren@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:09:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Richard Warren  
273 River Street  
P.O. Box 503  
Halifax, MA 02338

**From:** Catherine Melina <catherinemelina@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:19:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Catherine Melina  
Pleasant Street  
Cambridge, MA 02139

**From:** Erin Pillman <erinpillman@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:19:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Erin Pillman  
P.O. Box 30925  
Bethesda, MD 20824  
Bethesda, MD 20912  
6513351990

**From:** Julie Kimmel <juliekimmel@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:20:13 PM

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Thank you for this opportunity to comment and I look forward to your response.

Julie Kimmel  
11108 Boathouse Ct  
Reston, VA 20191  
703 9809383



From: Lauren DiPerna <squidpillow@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:20:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lauren DiPerna  
9008 West St  
Manassas, VA 20110  
(508) 728-8354

**From:** Judith Shematek <jshematek119@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:20:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Judith Shematek  
119 Chisman Landing  
Seaford, VA 23696

**From:** Coriena Reynolds <corienareynolds@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:21:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Coriena Reynolds  
533 Mount Olive Rd  
Toms brook, VA 22660  
540-333-0072

From: Jess Summers <JessicaS0615@msn.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:21:03 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jess Summers  
3318 Maplewood Ave.  
Richmond, VA 23221  
8045190045

**From:** Edward Rengers <edreng@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:21:45 PM

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Thank you for this opportunity to comment and I look forward to your response.

Edward Rengers  
391 John Joy Rd  
Woodstock, NY 12498  
8456796001

From: Glenn Ewen <glennnewen@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:22:01 PM

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Thank you for this opportunity to comment and I look forward to your response.

Glenn Ewen  
465 Greenwood Ave  
Trenton, NJ 08609



**From:** William Boteler <bbot20008@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:22:02 PM

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

William Boteler  
811 Houston Avenue #2  
811 Houston Avenue #2, Takoma Park, MD 20912  
Takoma Park, MD 20912  
202-253-9435

From: Jim Walsh <jimrwalsh@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:22:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jim Walsh  
165 Shore Blvd  
13  
Keansburg, NJ 07734  
7329796883

**From:** Kristen Gorman <klgorman@loyola.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:22:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kristen Gorman  
1 Christianson Cir.  
Abington, MA 02351  
(781) 974-2812

**From:** Elisheva Shalom <Naturereflections@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:22:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elisheva Shalom  
11804 Auth Lane  
Silver Spring, MD 20902  
240 4981161

**From:** Patricia Foster <paterina@frontiernet.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:22:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Patricia Foster  
89 Meyer Road  
Middletown, NY 10940

**From:** Carol Short <care412@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:23:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carol Short  
2615 Route 50  
Mays Landing, NJ 08330



**From:** Don Manning <donmanning@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:23:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Don Manning  
110 Panorama Point  
Lynchburg, VA 24502-2895  
4345824703

From: ray detitta <rdetitta@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:23:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

ray detitta  
126 laning ave  
pennington, NJ 08534  
6097370656

**From:** Fargo whitman <fargowhi@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:23:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

Fargo whitman  
567 6th Street, #8  
Brooklyn, NY 11215  
718 499 5573

**From:** Lisa Coker <lbcoker@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:23:57 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lisa Coker  
567 Legacy Pride Dr  
Herndon, VA 20170

**From:** Margaret Lantz <margaretlantz@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:23:58 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Margaret Lantz  
629 Stonecroft Lane  
Cary, NC 27519

**From:** Vidya Sivan <vsivan80@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Vidya Sivan  
27 Phillips Street  
Boston, MA 02114



**From:** Lois Gaudinier <wordwitchva@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lois Gaudinier  
2301A Coddington Road  
Brooktondale, NY 14817-9515

**From:** Cheryl Vallone <clvallone@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Cheryl Vallone  
10 ivy Lane  
Ashland, MA 01721-1020  
508-881-3515

**From:** Lee Fahey <lee.fahey@duke-energy.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

Lee Fahey  
3306 Granard Lane  
Charlotte, NC 28269  
704-549-1733

**From:** allison knabb <ahv7@oal.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:39 PM

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Thank you for this opportunity to comment and I look forward to your response.

allison knabb  
474 james sst  
phillipsburg, NJ 08865

**From:** Martin Konrad <mkonrad@aclcargo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:43 PM

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Thank you for this opportunity to comment and I look forward to your response.

Martin Konrad  
130 Branch Rd  
Bridgewater, NJ 08807-2115

**From:** Rita Babie <Babiem@nehealth.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:50 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rita Babie  
894 Hoosick Road  
Troy, NY 12180-6630  
518-279-3546



**From:** hanna supeyeva <anninamerica1982@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:24:56 PM

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Thank you for this opportunity to comment and I look forward to your response.

hanna supeyeva  
30 Chester ave  
Waltham, MA 02453

**From:** Navindra Ramcharran <nav2711@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:25:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Navindra Ramcharran  
39 Ketner Street  
Bloomfield, NJ 07003

**From:** Sheila Ryan <cobymom@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:25:25 PM

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Thank you for this opportunity to comment and I look forward to your response.

Sheila Ryan  
21511 Awbrey Pl  
Broadlands, VA 20148

**From:** Rachel Di Re <rachel.dire@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:25:41 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rachel Di Re  
76 Maybrook Road  
Campbell Hall, NY 10916  
8457424539

**From:** Heather Dunado <montreaux1991@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:25:42 PM

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Thank you for this opportunity to comment and I look forward to your response.

Heather Dunado  
33 Rockland Terrace  
Suffern, NY 10901  
845-357-5575

**From:** Chiari Legare <clubharriet@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:25:51 PM

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Thank you for this opportunity to comment and I look forward to your response.

Chiari Legare  
12 mulberry st, apt 1  
claremont  
claremont, NH 03743  
6033122011



**From:** Bonnie Preston <bonniepreston@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:25:58 PM

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Thank you for this opportunity to comment and I look forward to your response.

Bonnie Preston  
49 Mattson Ln.  
N/A  
Blue Hill, ME 04614  
207 374-3636

**From:** Michelle Cipriano <michcip110@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:26:05 PM

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Michelle Cipriano  
119 Harvard Street  
Apt. 1  
Cambridge, MA 02139  
6172303467

From: Bonnie Shapiro <bonnieS@njto.org>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:26:06 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Bonnie Shapiro  
500 Linwood Drive  
500 Linwood Drive  
Fort Lee, NJ 07024  
201-461-3586

From: Shaun Spriggs <saspriggs@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:26:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Shaun Spriggs  
1623 Woodbourne Ave.  
Baltimore, MD 21239  
410-433-8526

**From:** Cecelia Bishop <bishopc@sunysuffolk.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:26:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Cecelia Bishop  
170 Fairview Circle  
Middle Island, NY 11953

**From:** Trish Stevens <aquila@uninets.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:26:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Trish Stevens  
142 N Dixmont Rd  
Troy, ME 04987



From: vincent scialabba <vincescial@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:26:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

vincent scialabba  
p.o. 1311  
merchantville, NJ 08109

**From:** charlotte elsner <charlros@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:26:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

charlotte elsner  
1133 boynton ave  
westfield, NJ 07090  
908 2325706

**From:** Pamela Cataldo <pamhere5@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:26:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Pamela Cataldo  
5 Oxford Court  
Medford, NJ 08055  
609 714-7790

**From:** Lorraine Gentz <Hollywahoo@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:26:54 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lorraine Gentz  
296 Extonville Rd  
Allentown, NJ 08501-1501  
6092597118

**From:** Kara Michelin <kara.michelin@fandm.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:27:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Kara Michelin  
117 Woodward Ave.  
Rutherford, NJ 07070  
551-404-8632

**From:** David Clark <atmdude@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:27:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

David Clark  
138 E Antietam St, 204  
204  
Hagerstown, MD 21740  
301 733-8015



From: C OWENS <owenscl@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:27:32 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

C OWENS  
rte 6  
carmel, NY 10512

From: Susan Roth <srothsueroth1@netzero.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:27:58 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Susan Roth  
463 Cooper St  
463  
Beverly, NJ 08010  
609-747-1458

**From:** marjorie spagnuolo <mspagnuolo@msd.k12.ny.us>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:28:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

marjorie spagnuolo  
61 HAMPTON PLACE  
FREEPORT, NY 11520

**From:** Cynthia Rankin <cynthia.rankin@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:28:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Cynthia Rankin  
82 Siders Pond Road  
82 Siders Pond Road  
Falmouth, MA 02540  
508 540-6570

**From:** Antonio Aversano <antonio@dailypassion.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:28:33 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Antonio Aversano  
11 Mulberry Street  
Leeds, MA 01053

**From:** mary ann maynard <iowairene@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:28:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares. Surely this is not something you are aiming for.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation, and allow for the growth of small-scale fishermen. There should be a level playing field for those starting out and also for those who have not focused on quantity in the past but may be forced into competition with those who have. Fishermen who have not been so successful in the past should not be limited to perpetual non-success, while large industries dredge on ahead. The public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

mary ann maynard  
8 Farrington Road  
Croton on Hudson, NY 10520  
845-419-2281



**From:** Julia Lawlor <julialawlor@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:28:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Julia Lawlor  
37 Maplewood Ave.  
Maplewood, NJ 07040  
973 762-4935

**From:** John Solaperto <vze2r2ww@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:29:03 PM

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Thank you for this opportunity to comment and I look forward to your response.

John Solaperto  
10 Malden  
10 Malden Street  
Worcester, MA 01606

From: walter and susan cudnohufsky <walt@wcala.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:29:09 PM

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Thank you for this opportunity to comment and I look forward to your response.

walter and susan cudnohufsky  
455 Bug Hill Rd  
PO Box 419  
Ashfield, MA 01330  
413 628 4759

**From:** Pat Berger <thepondrd@roadrunner.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:29:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Pat Berger  
PO Box 667  
PO Box667  
Oakland, ME 04963

**From:** Crystal Tracy <crystal\_sea24@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:29:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Crystal Tracy  
8263 Sebring Court  
Severn, MD 21144  
4846201501

**From:** sam daghestani <daghestanis@student.wpunj.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:29:52 PM

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Thank you for this opportunity to comment and I look forward to your response.

sam daghestani  
wayne  
Wayne  
wayne, NJ 07470



From: Alicja Trzopek <talicja@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:29:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

Alicja Trzopek  
401 W. Stimpson Ave  
Linden, NJ 07036

**From:** Brian Knox <forests@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:30:09 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Brian Knox  
3288 Beards Point rd  
Davidsonville, MD 21035

From: Amy Hueber <hueber@srcinc.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:30:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Amy Hueber  
342 Westbrook Hills Dr  
Syracuse, NY 13215

**From:** Rosie Altmann -Kouvaris <rkouvaris@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:30:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Rosie Altmann -Kouvaris  
14937 Scothurst Lane  
CHARLOTTE, NC 28277

**From:** Pam Murray <wallydoodlebree@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:30:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Pam Murray  
Military Rd.  
Remsen, NY 13438

**From:** Scott Amundsen <scottsteaux63@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:30:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Scott Amundsen  
556 Gifford Hill Road  
Oneonta, NY 13820-4186  
8204186



**From:** Barry Goldsmith <april22@maine.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:31:09 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Barry Goldsmith  
51 Pine Ridge Road  
North Yarmouth, ME 04097  
207 846-4889

**From:** Jake Anderson <ajakef@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:31:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jake Anderson  
2160 Royall Dr  
Winston-Salem, NC 27106

**From:** Tim McCoy <timjmccoy@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:31:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Tim McCoy  
121 Park Dr.  
Apt. 5  
Manlius, NY 13104

From: jon greenberg <jvermont@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:31:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

jon greenberg  
5938 Pittsburgh Avenue  
5938 Pittsburgh Avenue  
Mays Landing, NJ 08330  
516 456-8291

**From:** Emily Turner <eturne02@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:32:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Emily Turner  
15907 Nottingham Road  
Upper Marlboro, MD 20772  
2402741541

**From:** Alicia Korten <alicia@renewal.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:32:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Alicia Korten  
2301 North Kenmore Street  
Arlington, VA, VA 22201  
(703) 875 9239



**From:** Margaret Silvers <marsilvers@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:32:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Margaret Silvers  
404 Manor Ridge Drive  
Carrboro, NC 27510  
919-932-7453

**From:** Anne Wisniewski <annemdw@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:33:10 PM

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Thank you for this opportunity to comment and I look forward to your response.

Anne Wisniewski  
13515 John Cline Road  
Smithsburg, MD 21783

**From:** ted dawson <teddawson62@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:33:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

ted dawson  
central ave  
rye, NY 10580

**From:** Kathleen Coffey <kcoffey@frontiernet.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:33:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kathleen Coffey  
3 Wagner Drive  
Rock Tavern, NY 12575  
845-496-4085

**From:** Noel-Anne Brennan <nbrennan@etal.uri.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:33:40 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Noel-Anne Brennan  
231 Curtis Corner Road  
Peace Dale, RI 02879-2129

**From:** Jeremy Lopez <lopez.jeremy@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:33:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jeremy Lopez  
16 Brevoort Road  
Chappaqua, NY 10514  
914-238-0360



From: Nicholas Calvino <calvino.n@husky.neu.edu>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:34:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nicholas Calvino  
443 Jackson Ave.  
New Windsor, NY 12553

**From:** Michele Mattioli <mattioli@ntelos.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:34:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Michele Mattioli  
548 Three Pond Lane  
Earlsville, VA 22936

**From:** Frank Dall <dallfrank@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:34:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Frank Dall  
20210 Yankee Harbor Place  
Montgomery Village, MD 20886  
301 527 0508

**From:** Kevin Rhoads <kgrhoads@alum.mit.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:34:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kevin Rhoads  
188 D. C. Hwy  
POBox 302  
Lyme, NH 03768-0302

**From:** Maria Parrella <parrella.m@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:34:41 PM

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Thank you for this opportunity to comment and I look forward to your response.

Maria Parrella  
7-22 Cross Mdws  
Fair Lawn, NJ 07410

**From:** O. Ruiz <osiel2001@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:34:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

O. Ruiz  
Normandy Road  
Clifton, NJ 07013



**From:** Susan Edelstein <macturtle@att.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:34:59 PM

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Thank you for this opportunity to comment and I look forward to your response.

Susan Edelstein  
308 Heidinger Drive  
Cary, NC 27511

**From:** Ray Nichols <sagemongo@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:35:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ray Nichols  
71 Florence Rd  
Florence, MA 01062  
413-320-6515

**From:** Alice Theibault <artheibault@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:35:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Alice Theibault  
7 Foxcroft Ct  
Nason Hall 105  
Voorhees, NJ 08043  
(856) 275-4322

**From:** Margaret Srubek <annsrubek@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:35:18 PM

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Thank you for this opportunity to comment and I look forward to your response.

Margaret Srubek  
703 Somerset Park Dr. SE  
#205  
Leesburg, VA 20175  
505-235-7492

**From:** Marion Farina <farina39@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:35:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

Marion Farina  
39 OAK CREST RD  
39 Oak Crest Rd.  
WEST ORANGE, NJ 07052  
973 2439269

**From:** Blake Winter <mad2physicist@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:35:34 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Blake Winter  
6313B W. Quaker St.  
Orchard Park, NY 14127



**From:** Linda North <lnorth@broyhillfurn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:35:50 PM

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Thank you for this opportunity to comment and I look forward to your response.

Linda North  
804 Barrett Mtn Rd  
Taylorsville, NC 28681  
828 635-5829

**From:** Ingrid Werner <i.werner@att.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:36:21 PM

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Thank you for this opportunity to comment and I look forward to your response.

Ingrid Werner  
344 Audubon Rd.  
Englewood, NJ 07631

**From:** Jane Sunshine <janesunshine6@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:36:32 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jane Sunshine  
16 Woodstock Mdws, #B8  
Woodstock, NY 12498-3104  
845 679-9379

From: \Kimberly Smith <misshockeyfn@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:36:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

"Kimberly Smith  
30 Cumberland St.  
Apt. 5  
Brunswick, ME 04011  
207-319-4373

**From:** Richard Berggren <rchberggren@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Richard Berggren  
8 Suffolk Ave  
Maplewood, NJ 07040

**From:** Eric Krasinski <EricKrasinski@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Eric Krasinski  
9 Kingston Lane  
Cheektowaga, NY 14225  
6468814797



**From:** cheryl johnson <cmjohnson115@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

cheryl johnson  
3607 Quail Meadows Place  
midlothian, VA 23112

**From:** sharon intilli <greenbe8@warwick.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:41 PM

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Thank you for this opportunity to comment and I look forward to your response.

sharon intilli  
260 pine island turnpike  
warwick, NY 10990  
845 9885082

**From:** Debra Myers <wildflowerz5402@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:49 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Debra Myers  
3642 County Rd. 23A  
Dundee, NY 14837-9388  
607-292-6396

**From:** Mary Anne Grimley <symbioticsisters@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:37:54 PM

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Thank you for this opportunity to comment and I look forward to your response.

Mary Anne Grimley  
PO Box 32  
Beaufort, NC 28516  
2522409310

**From:** Cynthia Lawrence-Miles <lawrence.cynthia@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:38:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Cynthia Lawrence-Miles  
3101 Link Road #114  
114  
Lynchburg, VA 24503  
434-941-9640

From: patrick dell'italia <panevino@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:38:12 PM

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Thank you for this opportunity to comment and I look forward to your response.

patrick dell'italia  
42 nostrand ave.  
42 Nostrand Ave.  
selden, NY 11784  
6316987346



**From:** Carol Allan,ssj <allanc@elms.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:38:12 PM

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Thank you for this opportunity to comment and I look forward to your response.

Carol Allan,ssj  
34 Marion St  
Chicopee, MA 01013

**From:** Amanda Collins <Amandachasecollins@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:38:32 PM

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Thank you for this opportunity to comment and I look forward to your response.

Amanda Collins  
5107 Crossfield Court  
Rockville, MD 20852

**From:** Dennis Souto <densou@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:39:08 PM

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Thank you for this opportunity to comment and I look forward to your response.

Dennis Souto  
218 Willard Avenue  
Portsmouth, NH 03801  
603-498-3936

**From:** Emily Dale <edale@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:39:21 PM

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Thank you for this opportunity to comment and I look forward to your response.

Emily Dale  
P.O. Box 501  
Franklin, NC 28744-0501  
828-369-9050

**From:** Edith Eskenasy <edithesk@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:39:26 PM

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Thank you for this opportunity to comment and I look forward to your response.

Edith Eskenasy  
62-D Lake Club Circle  
Hendersonville, NC 28792

**From:** Cathy Lazarewicz <englishirishpolish@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:39:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

Cathy Lazarewicz  
P.O. Box 657  
Buffalo, NY 14207-0657  
716-836-0256



From: Annette Dion <adion82@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:39:55 PM

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I have watched many fishing families lose everything to the horrifically unfair "catch share" program. It is heartbreaking.

Thank you for this opportunity to comment and I look forward to your response.

Annette Dion  
1111R Washington St.  
1111R Washington St.  
Gloucester, MA 01930  
978 2393586

From: rosa naranjo <rosamnaranjo@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:39:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

rosa naranjo  
4119 Castleford Drive  
colfax, NC 27235  
336-423-9730

**From:** Steve Divens <steve\_divens@HOTMAIL.COM>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:40:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Steve Divens  
3651 Sleepy Hollow Rd  
Wake Forest, NC 27587  
9199869762

**From:** Linda Elsenhans <lumayoe@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:40:13 PM

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Thank you for this opportunity to comment and I look forward to your response.

Linda Elsenhans  
9 Copernicus Ct  
cranbury, NJ 08512

From: Pamylle Greinke <pamylle@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:40:42 PM

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Thank you for this opportunity to comment and I look forward to your response.

Pamylle Greinke  
P.O. Box 456  
P.O. Box 456  
Peconic, NY 11958  
6317650000

**From:** Jackie Kerr <kerrcreative@att.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:40:43 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jackie Kerr  
314 Melody Circle  
Swannanoa, NC 28778



From: Michael Haskell <mikehaskell@maine.rr.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:41:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Michael Haskell  
7 Sweetbrier Lane  
Scarborough, ME 04074  
207-749-3255

**From:** Joel Leitner <Joel@JoelLeitner.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:41:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions,

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Joel Leitner  
77 Myrtle Blvd  
Larchmont, NY 10538-2319  
914-426-8969

**From:** Kenneth Depew, Jr. <kendepew@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:41:54 PM

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Thank you for this opportunity to comment and I look forward to your response.

Kenneth Depew, Jr.  
537 south main street  
phillipsburg, NJ 08865  
908-859-0279

**From:** S. Thompso <himalayasun@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:42:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

S. Thompso  
168 Frazer Ave  
Collingswood, NJ 08108

**From:** Bonnie Gorman RN <bonniegorman1@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:42:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Bonnie Gorman RN  
222 rock island rd  
Quincy, MA 02169-3841

**From:** karen flood <kflood26@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:42:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

karen flood  
472 state route 55  
barryville, NY 12719  
917.805.8583



**From:** Selina Newbert <PGINC@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:42:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Selina Newbert  
2 East Moriches Blvd.  
East Moriches, NY 11940  
631 281 6001

**From:** Elizabeth Earle <eegardenbliss@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:42:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elizabeth Earle  
7 Granite Street  
Peterborough, NH 03450

From: Ann Gerard Alfano <alfano248@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:42:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ann Gerard Alfano  
1915 Huntington Drive  
Cherry Hill, NJ 08003  
856-751-9614

**From:** DANIEL SCHLAGMAN <DESCO0316@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:42:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

DANIEL SCHLAGMAN  
338 CHERRY PLACE  
EAST MEADOW, NY 11554  
516-794-0254

**From:** Vivienne Woodhead <vw1949@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Vivienne Woodhead  
6 Linwood Place  
Gloucester MA 01930  
Gloucester, MA 01930  
978 283 1847

**From:** Nolyn Sprouse <bjornstjern@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nolyn Sprouse  
10424 Chesdin Ridge drive  
Petersburg, VA 23803



**From:** Mina Connor <momina@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mina Connor  
25 Crosby Lane  
Londonderry, NH 03053-3274  
6034340096

**From:** Douglas Sedon <sedond@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:24 PM

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Thank you for this opportunity to comment and I look forward to your response.

Douglas Sedon  
6815 buckingham lane  
Buckeystown, MD 21717

**From:** Marie schopac <benzmarie@cox.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:30 PM

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Thank you for this opportunity to comment and I look forward to your response.

Marie schopac  
20 Indian Trail  
Charlestown, RI 02813  
4013649846

**From:** Tricia Larzelere <jplarz@care2.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:34 PM

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Thank you for this opportunity to comment and I look forward to your response.

Tricia Larzelere  
3256 Rt. 54A  
Keuka Park, NY 14478  
315-536-8504

From: Paul Naylor <naylorpaul@msn.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:43:37 PM

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Thank you for this opportunity to comment and I look forward to your response.

Paul Naylor  
3508 Manford Drive  
3508 Manford Drive  
Durham, NC 27707  
919 493-3702

**From:** Gail Veiby <herathveiby@charter.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:58 PM

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Thank you for this opportunity to comment and I look forward to your response.

Gail Veiby  
16 Nipmuck Drive  
16 Nipmuck Drive  
Westborough, MA 01581  
508-870-1742



From: Beth Henry <bethhenry@carolina.rr.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:43:58 PM

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Beth Henry  
3066 Stoneybrook Road  
Charlotte, NC 28205  
3066 Stoneybrook

**From:** Francie Portnoy <fportnoy@bellsouth.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:43:59 PM

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Thank you for this opportunity to comment and I look forward to your response.

Francie Portnoy  
5413 Pigeon Cove Dr  
5413 Pigeon Cove, Greensboro NC  
Greensboro, NC 27410  
336-605-3010

**From:** John Thackston <jake.Thackston@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:44:16 PM

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Thank you for this opportunity to comment and I look forward to your response.

John Thackston  
3130 Old Lynchburg Rd  
North Garden, VA 22959

**From:** Sunae Harket <sunaeharket@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:44:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sunae Harket  
1830 Logan Street  
Richmond, VA 23235

From: Maria Reidelbach <maria@hoopla.org>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:44:31 PM

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Thank you for this opportunity to comment and I look forward to your response.

Maria Reidelbach  
23 Main St.  
Accord, NY 12404

**From:** Judith Goodwin <jag7558961@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:44:38 PM

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Thank you for this opportunity to comment and I look forward to your response.

Judith Goodwin  
3953 Winwick Way  
A  
Virginia Beach, VA 23456  
7573016393



**From:** Ari Daniels <str8.70s@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:44:46 PM

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Ari Daniels  
856 Hacktown Rd.  
Keswick, VA  
Keswick, VA 22947  
434-409-3075

**From:** Bill Kuebel <bkframes@frontiernet.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:45:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Bill Kuebel  
1406 East Ridge RD  
r  
Rochester, NY 14621-2007

**From:** McDowell Myers <mcdowellmyers@vanclaborers.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:45:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

McDowell Myers  
6533 Laban Road  
Roanoke, VA 24019  
540-366-3401

From: emma bruno <ebruno@bostoncapital.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:45:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

emma bruno  
1458 hancock st #200  
quincy, MA 02169

From: Liz Archila <Taurusnode@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:45:35 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Liz Archila  
1299 Commonwealth Ave  
Allston, MA 02134  
67-784-6497

**From:** Jared Polens <jpolens@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:45:40 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Jared Polens  
366 1/2 Houghton St.  
North Adams, MA 01247



**From:** Loretta Fisher <swtangl1013@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/02/2011 5:22:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Loretta Fisher  
233 metropolitan ave  
Roslindale, MA 02131

**From:** Jon Batson <jontreel3@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:45:49 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Jon Batson  
33 Prospect St.  
Rochester, NH 03867  
6033355372

**From:** Cheryl Rohlicek <cheryl.rohlicek@alum.bu.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:46:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Cheryl Rohlicek  
86 Standish Rd  
86 Standish Rd  
Watertown, MA 02472  
617 924-5356

From: Carolyn Clapp <ricey.clapp@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:46:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions. I support the viability of small-scale fisherman who cycle funds back into their communities. There will be no economic recovery if policy continues to favor large industry and corporations over small, locally-owned and operated fishing businesses.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Carolyn Clapp  
39 Westover Drive  
Asheville, NC 28801  
828-505-1018

**From:** Mitchell Jones <mitchellpjones@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:46:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Mitchell Jones  
3716 Ellerslie Ave  
Baltimore, MD 21218  
(410) 814-6689

**From:** Faith Chanda <fchanda@live.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:46:53 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Faith Chanda  
filomina drive  
Cornwall, NY 12518



**From:** Barbara Hopkinson <barhop@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:46:53 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Barbara Hopkinson  
64 Northern Blvd  
Plum Island  
Newbury, MA 01951

**From:** Richard Campanile <rc60199@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:46:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

Richard Campanile  
3920 N. Freeman Rd.  
Orchard Park, NY 14127  
7166623543

**From:** Liz Archila <Taurusnode@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:47:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Liz Archila  
1299 Commonwealth Ave  
Allston, MA 02134  
67-784-6497

**From:** Barbara Brandler <barbaral3bb1984@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:47:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Barbara Brandler  
PO Box 56  
West Camp, NY 12490

**From:** Lona Farula <farulf@juno.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:47:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lona Farula  
291 Shoreline Dr  
New Bern, NC 28562  
252-633-9322

**From:** Carol Chappell <ccngbrazil@hughes.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:47:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Carol Chappell  
81 Clove Valley Road  
High Falls, NY 12440  
845-687-9001



**From:** Amy Richardson <amyrich18@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:47:53 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Amy Richardson  
27 Englewood Rd  
Clifton, NJ 07012  
973-617-0909

**From:** Paul G. Hammer <pgsledge47@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:48:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Paul G. Hammer  
40 Hornsby Drive  
40 Hornsby Drive  
Marlton, NJ 08053-1919

From: Patti Ulirsch <pulirsch@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:48:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Patti Ulirsch  
16 Woodmere Rd  
16 Woodmere Rd  
Arden, NC 28704  
828-654-8249

**From:** Anthony Doherty <anthony\_doherty@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:48:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Anthony Doherty  
17248 Arrowood Place  
17248 Arrowood Place  
Round Hill, VA 20141

From: Nancy Canning <ncanning@capecod.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:48:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nancy Canning  
39 Onset Avenue  
Buzzards Bay, MA 02532

**From:** Lisa Jackson <ljackson@niagara.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:48:24 PM

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Thank you for this opportunity to comment and I look forward to your response.

Lisa Jackson  
442 Tryon Drive  
Drive  
Lewiston, NY 14092  
716-286-8001



**From:** Sol Troy <123jump@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:48:27 PM

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Thank you for this opportunity to comment and I look forward to your response.

Sol Troy  
16142 English Setter Ct.  
English, Setter, Ct.  
Amissville, VA 20106-2248  
5409377275

**From:** Nancy Canning <ncanning@capecod.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:48:28 PM

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Thank you for this opportunity to comment and I look forward to your response.

Nancy Canning  
39 Onset Avenue  
Buzzards Bay, MA 02532

From: Robin Fox <robinfox@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:48:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Robin Fox  
20 Short Hill Road  
Croton-on-Hudson, NY 10520  
914-271-6088

**From:** Joshua Sloan <jcs2470@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:48:47 PM

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Thank you for this opportunity to comment and I look forward to your response.

Joshua Sloan  
10811 Amherst Ave #A  
Silver Spring, MD 20902

From: lillian shearer <lillshearer@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:48:50 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

lillian shearer  
2509 Dewitt ave  
alexandria, VA 22301  
7034725351

From: Patricia Ross <foxwinfarmllc@frontiernet.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:48:54 PM

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Thank you for this opportunity to comment and I look forward to your response.

Patricia Ross  
2418 Wilawana Rd.  
Elmira, NY 14901



**From:** Diane Crowe <diacrowe@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:49:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Diane Crowe  
78 Cave Hill Rd.  
Leverett, MA 01054

From: angus gilchrist <angusgilchrist@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:49:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

angus gilchrist  
46 power house rd  
glen spey, NY 12737  
914.474.1760

**From:** Alan Wojtalik <alan\_wojtalik@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:49:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Alan Wojtalik  
3723 Green Oak Court  
Baltimore, MD 21234-4258  
4106650881

From: Ann Rosen <Anntrosen@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:49:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ann Rosen  
166 mountain avenue  
166 Mountain Ave.  
Westfield, NJ 07090  
908 6544333

**From:** Betty Abadia <benigni@embarqmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:49:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Betty Abadia  
171 Goldfinch Lane  
New Bern, NC 28560  
2526362084

From: susan shaw <sue234@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:50:03 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

susan shaw  
12 Jarvis lane  
12 Jarvis lane  
north attleboro, MA 02760  
508-643-9871



**From:** Joan Kozar <joan.kozar@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:50:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Joan Kozar  
12 Maple Lane  
Harwich, MA 02645  
5084326052

**From:** Betsy Germanotta <betsydanteg@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:51:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Betsy Germanotta  
175 Harvey St. #2  
Cambridge, MA 02140  
617 868-6626

**From:** Anne de Rham <mderham36@roadrunner.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:51:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Anne de Rham  
539 Birches Rd. PO Box 185  
PO Box 185  
franconia, NH 03580

**From:** Mary Ellen Marucci <mary.marucci@maine.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:51:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mary Ellen Marucci  
28 Pleasant St., #201  
Fort Kent, ME 04743  
207-538-5770

**From:** Barbara Bills <barbarabills51@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:51:47 PM

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Thank you for this opportunity to comment and I look forward to your response.

Barbara Bills  
68 Willow St  
68 Willow St  
Sayville, NY 11782-3216  
6312181844

**From:** Robin Durfey <darlene3161@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:51:47 PM

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Thank you for this opportunity to comment and I look forward to your response.

Robin Durfey  
P.O. Box 196  
P. O. Box 196  
Fulton, NY 13069



**From:** Damian McDonnell <dmonmcd@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:52:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Damian McDonnell  
5 Harriet Dr.  
Bridgewater, MA 02324  
5086974245

**From:** Jennifer Creech <jennifercreech@fastmail.fm>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:52:08 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jennifer Creech  
150 Lantern Lane  
Rochester, NY 14623-1328

**From:** Susan Blain <s\_blain@mwcc.mass.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:52:11 PM

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Thank you for this opportunity to comment and I look forward to your response.

Susan Blain  
156 Vernon Street  
Gardner, MA 01440

**From:** Michael Carney <mcarneyv@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:52:21 PM

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Michael Carney  
25 Bowers Ave.  
Runnemede, NJ 08078

From: Marc B <mbaizman@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:52:33 PM

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Thank you for this opportunity to comment and I look forward to your response.

Marc B  
66 Beacon St.  
Boston, MA 02108

**From:** Janet Clark <farmer@steadylanefarm.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:52:47 PM

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Thank you for this opportunity to comment and I look forward to your response.

Janet Clark  
291 School Street  
Acton, MA 01720



From: Gerald Beyer <gerrybeyer@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:53:15 PM

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Thank you for this opportunity to comment and I look forward to your response.

Gerald Beyer  
27 Shrewsbury Ave  
Highlands, NJ 07732

**From:** Jerry Wehle <jwehle1@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:53:21 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jerry Wehle  
24 Stevens Road  
Toms River, NJ 08755  
732 604-0414

**From:** peter maron <pmaron@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:53:38 PM

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peter maron  
26 Beach road  
26 beach road ossining ny 10562  
Ossining, NY 10562  
914=941=9236

**From:** elisabeth hughes <bowmannowell@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:53:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

elisabeth hughes  
rutter  
Rutter St.  
baltimore, MD 21217

**From:** Curtis Adamo <curtis.s.adamo@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:53:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Curtis Adamo  
8415 Bellona Ln.  
8415 Bellona Ln.  
Towson, MD 21204  
410-409-1030

**From:** Donald J. Shaw <donshawcats@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:53:53 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Donald J. Shaw  
200 Lynch Ave.  
200 Lynch Ave.  
SYRACUSE, NY 13207  
315 4261919



**From:** Kristin McGee <mcgee\_kristin@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:54:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kristin McGee  
210 Brownville  
Hillsborough, NC 27278

**From:** Hadassah Fleishon <hhardouf@google.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:54:47 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Hadassah Fleishon  
3 Chauncy  
Apt 16  
Cambridge, MA 02138-2607  
617-5762381

From: d carr <d.c.carr@home.nl>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:55:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

d carr  
22a School Street  
Hanover, NH 03755

**From:** Denise Maurer <dmaurer@ets.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:55:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Denise Maurer  
17 Intervale Road  
Hamilton, NJ 08620  
6097345283

**From:** Thomas migliorini <thomas.migliorini@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:56:09 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Thomas migliorini  
16418 Keats Ter  
Derwood, MD 20855  
301.648.6317

From: Karen Fedorov <klfedorov@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:56:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Karen Fedorov  
8044 Tackett Lane  
Bealeton, VA 22712-7844  
5404393813



From: Karen Fisher <Kareninaction@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:56:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Karen Fisher  
40 Nimitz Rd.  
Wayne, NJ 07470  
862-219-2887

**From:** Mark Donato <markdonato@hvc.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:56:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

Mark Donato  
194 Watson Hollow Rd.  
West Shokan, NY 12494

**From:** Allan Tanzman <atanzman@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:56:54 PM

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Thank you for this opportunity to comment and I look forward to your response.

Allan Tanzman  
37  
Newton, MA 02459

**From:** Eric Becker <rulebecker@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:56:57 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Eric Becker  
25 Malvern Ave.  
Somerville, MA 02144

From: Sara Germain <germainsr@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:57:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sara Germain  
15 Hillside Avenue  
Corinth, NY 12822

**From:** Andrew Mumford <galacticempire63006@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:57:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Andrew Mumford  
25 Woodhollow Road  
colts neck, NJ 07722  
732-740-3413



**From:** Sarah Puleo <sarahepuleo@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 1:58:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sarah Puleo  
438 ISAAC BUDD ROAD  
SOUTHAMPTON, NJ 08088

From: Wendy Ebersberger <wsebersberger@earthlink.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 1:58:49 PM

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Thank you for this opportunity to comment.

Wendy Ebersberger  
153 Chapman Ln  
Front Royal, VA 22630

**From:** Lori Watkins <LoriWatkins@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:01:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lori Watkins  
772 Rifle Camp Road  
Woodland Park, NJ 07424  
973-785-4837

From: Holly Von Seggern <vonseggernh@whitsons.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:01:24 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Holly Von Seggern  
24 Stellenwerf Avenue  
East Islip, NY 11730  
631-424-2700

**From:** Tusi Gastonguay <ritachild@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:01:25 PM

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Thank you for this opportunity to comment and I look forward to your response.

Tusi Gastonguay  
121 Willow Street  
Florence, MA 01062  
413 585-0778

**From:** Anna Vaudin <amvaudin@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:01:40 PM

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Thank you for this opportunity to comment and I look forward to your response.

Anna Vaudin  
19307 Liberty Mill Rd  
Germantown, MD 20874



**From:** Beverly Linton <thessada@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:01:48 PM

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Thank you for this opportunity to comment and I look forward to your response.

Beverly Linton  
25 Udine Street  
Arlington, MA 02476-7006

**From:** gisele jacobson <giselejacobson@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:02:00 PM

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Thank you for this opportunity to comment and I look forward to your response.

gisele jacobson  
14 mcevoy road  
edison, NJ 08837  
732-225-2875

**From:** David Mickelsen <damickelsen@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:03:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

David Mickelsen  
67 Harland Rd.  
Waltham, MA 02453-7642

**From:** Naheed Vatcha <naheed.vatcha@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:03:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Naheed Vatcha  
19 Plum Grove Way  
19 Plum Grove Way  
Gaithersburg, MD 20878

**From:** Andrew Lawson <andreww522@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:03:31 PM

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Thank you for this opportunity to comment and I look forward to your response.

Andrew Lawson  
948 S Anson Rd  
Stanfordville, NY 12581

From: Robert Story <theIbishead@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:03:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Robert Story  
1805 Gracewood Dr.  
Greensboro, NC 27408  
(336)202-5571



**From:** Jennifer Sammut <jsaphire7@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:03:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jennifer Sammut  
520 Louisiana Trail  
Browns Mills, NJ 08015

**From:** Elaine Mallory <missy52k@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:04:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elaine Mallory  
9 State St. Apt. J  
Leominster, MA 01453  
9785494081

**From:** sandy walsh <sandy.thespace@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:04:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

sandy walsh  
130 miacomet  
nantucket, MA 02554  
508.863.1308

**From:** Jordan Pavlus <jordan.pavlus@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:04:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jordan Pavlus  
613 Sedgwick Drive  
Syracuse, NY 13203

**From:** Eloy Santos <eloyjsantos@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:04:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Eloy Santos  
Horno 13  
Madrid, NC 28010

**From:** David Snope <ds31@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:04:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

David Snope  
31 School St.  
Califon, NJ 07830



**From:** Roxy Gray <roxyjay5@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:05:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Roxy Gray  
5 Paddock Circle  
5 Paddock Circle  
Canton, MA 02021  
781 821 4964

From: sandra cohen <wherearethebirds@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:05:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

sandra cohen  
284 sidney street  
cambridge, MA 02139

**From:** Fran Egloff <frangator@bellsouth.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:06:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Fran Egloff  
2552 Cottage Place  
Greensboro, NC 27455  
2828345

**From:** chris palmaro <countcollar@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:06:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

chris palmaro  
744 blvd east  
744 blvd east  
weehawken, NJ 07086

**From:** pamela edwards <pedwards9@maine.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:06:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

pamela edwards  
921 Port Rd.  
921 Port Rd. Machiasport e 04655  
Machiasport, ME 04655

**From:** Judith Aldi <sfalbo2@roadrunner.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:06:45 PM

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Thank you for this opportunity to comment and I look forward to your response.

Judith Aldi  
30 Bramblewood Rd.  
Clark Mills, NY 13321

From: Tami Palacky <tpalacky@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:06:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Tami Palacky  
8005 Bethelen Woods Lane  
Springfield, VA 22153



**From:** Art Lajeunesse <alajeun314@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:07:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Art Lajeunesse  
73 Broadway  
73 Broadway  
Latham, NY 12110

**From:** tom watson <tomjoewatson@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:07:30 PM

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Thank you for this opportunity to comment and I look forward to your response.

tom watson  
112 adams drive  
montauk, NY 11954  
631 668 3958

From: Garry Gleckel <gleckel@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:07:58 PM

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Thank you for this opportunity to comment and I look forward to your response.

Garry Gleckel  
185 Main St  
Ashby, MA 01431  
978.386.5394

**From:** Jennifer Finnegan <Jlfinn@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:08:32 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jennifer Finnegan  
440 Toms River Rd  
Jackson, NJ 08527  
7328338554

**From:** Rich Meyer <ricmeyer@tds.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:08:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rich Meyer  
211 Bolstridge Road  
Corinna, ME 04928  
207 278 5669

**From:** Pastor Thomas Humphrey <thomashumphrey@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:09:24 PM

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Thank you for this opportunity to comment and I look forward to your response.

Pastor Thomas Humphrey  
105 Williams Ave  
Amityville, NY 11701

**From:** Lynn Palmiter <lynn.jr@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:09:44 PM

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Thank you for this opportunity to comment and I look forward to your response.

Lynn Palmiter  
172 4th Street  
Troy, NY 12180  
518 274-2031



**From:** Bonnie Moore <r\_e\_moore@juno.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:09:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

Bonnie Moore  
18319 Honeylocust Circle  
Gaithersburg, MD 20879

**From:** GRACE DeFillipo <gdefillipo@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:09:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

GRACE DeFillipo  
501 W. Elm St. #2A  
Linden, NJ 07036  
908-359-8952

**From:** Stephen Mitchell <smitchell6@hvc.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:09:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Stephen Mitchell  
13 Danbury Ct  
Rock Hill, NY 12775  
5183214289

From: Terry Merrill <terrymerrill@me.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:10:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Terry Merrill  
5 Jennifer Court  
New Paltz, NY 12561

**From:** Ellen Goodman <egoodman1942@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:10:36 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Ellen Goodman  
117 Warren Ave., Apt.1  
East Providence, RI 02914  
401 241-4768



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**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:10:36 PM

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Thank you for this opportunity to comment and I look forward to your response.

Ellen Goodman  
117 Warren Ave., Apt.1  
East Providence, RI 02914  
401 241-4768



**From:** Gregory Austin <gregaustin@mindspring.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:10:37 PM

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Thank you for this opportunity to comment and I look forward to your response.

Gregory Austin  
901 Plumstead Road  
Charlotte, NC 28216-3152  
704 399-6642

**From:** Mikki Chalker <ravynsdaughter@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:10:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mikki Chalker  
119 Prospect St  
x  
Binghamton, NY 13905  
607-771-6892

**From:** Alice Cole <mematonine@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:11:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Alice Cole  
392 Fern Avenue  
392 Fern Avenue  
Wyckoff, NJ 07481  
201-891-0394

**From:** William Young <bluescat48@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:11:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

William Young  
226 Main St  
Leominster, MA 01453-2933  
9787284023

**From:** Page Mead <pagemead@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:11:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Page Mead  
24 Gerrish Island Lane  
Kittery Point, ME 03905  
207-439-0638

**From:** Holly Cohen <barryholly@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:11:31 PM

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Thank you for this opportunity to comment and I look forward to your response.

Holly Cohen  
408 Sheffield Court  
Brewster, NY 10509  
845-940-1640

**From:** Paul Finker <walkhike@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:11:48 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Paul Finker  
375 Woodland Ct.  
coram, NY 11727



**From:** Mary Stack <mstack@ceoexpress.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:11:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

Mary Stack  
39 Tileston Street  
Boston, MA 02113-1949

**From:** Kathy Burpee <java\_sparrow@juno.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:12:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kathy Burpee  
6 High Street  
Cold Spring, NY 10516

**From:** BiLL Fowlie <bill.fowlie.no.co2@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:12:47 PM

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Thank you for this opportunity to comment and I look forward to your response.

BiLL Fowlie  
19 Wellington Rd  
Harmony, ME 04942  
2072383121

**From:** Richard Neill <rneill13@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:12:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

Richard Neill  
19 Windintgway  
19 windingway, CMCH, NJ 0-8210  
CAPE MAY CH, NJ 08210  
609 465 7001

**From:** Mary Jane Hadley Walsh <kalamitejane@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:12:55 PM

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Thank you for this opportunity to comment and I look forward to your response.

Mary Jane Hadley Walsh  
103 Central Ave  
103 Central Ave  
Milton, MA 02186  
617-698-1024

**From:** Barbaralynn Altorfer <barbie@workman.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:13:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Barbaralynn Altorfer  
628 Kissam Road  
Peekskill, NY 10566

**From:** Thomas giblin <twgiblin@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:13:39 PM

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Thank you for this opportunity to comment and I look forward to your response.

Thomas giblin  
130 Ahern Rd  
Binghamton, NY 13903-6517  
607 772-0284



**From:** Joanna Bagatta <jolittrell@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:14:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Joanna Bagatta  
7 casse ct  
7 casse ct  
mahopac, NY 10541  
914 6436375

From: Marilea Fried <mpolkfried@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:14:32 PM

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Thank you for this opportunity to comment and I look forward to your response.

Marilea Fried  
130 Federal Street  
Salem, MA 01970  
617-734-6559

From: David Scheck <dscheck7@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:14:34 PM

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David Scheck  
349 Washburn Rd  
Spencer, NY 14883

**From:** albert burns <acburns1@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:14:36 PM

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albert burns  
23101 bank barn ct  
germantown, MD 20876  
301-515-0607

From: Matt Hardin <h\_comf@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:14:54 PM

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Thank you for this opportunity to comment and I look forward to your response.

Matt Hardin  
2354 Old Chapel Rd  
Boyce, VA 22620

**From:** Barbara Vanduyne <albatross322@bellsouth.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:15:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Barbara Vanduyne  
1400 Carolina Beach Ave. N  
Box 322  
Carolina Beach, NC 28428  
910 458-5035

**From:** Megan Brodbeck <meganhobbs00@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:15:23 PM

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Thank you for this opportunity to comment and I look forward to your response.

Megan Brodbeck  
16 Longview Avenue  
16 Longview Avenue  
Madison, NJ 07940  
9175877316



**From:** Lacresha Johnson <ljohnson6@une.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:15:36 PM

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Thank you for this opportunity to comment and I look forward to your response.

Lacresha Johnson  
11 Hills Beach Rd  
apt 512  
Biddeford, ME 04005  
2168359646

**From:** Kathleen Cunningham <katc.yoga@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:15:41 PM

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Kathleen Cunningham  
415 South Huntington Ave  
Jamaica Plain, MA 02130

**From:** Craig Cascio <vitamincraig@juno.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:16:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Craig Cascio  
67 Oak St  
Oak St  
Amityville, NY 11701

**From:** L. Mataya <Moonridgel3@carolina.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:16:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

L. Mataya  
11724 Moonridge Dr.  
11724 Moonridge Dr.  
Charlotte, NC 28226  
704 543-0280

**From:** Emily Fox <efsignup@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:16:17 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Emily Fox  
40 Brookline Ave. #3  
Holyoke, MA 01040

From: summer zedan <summer.zedan@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:16:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

summer zedan  
12672 magna cart road  
herndon, VA 20171

**From:** Benjamin Reynolds <benolds10@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:16:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Benjamin Reynolds  
134 Mt Vernon St  
Dedham, MA 02026



**From:** kellie schroeder <kellieschroeder@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:17:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

kellie schroeder  
3 littlehale rd  
durham, NH 03824  
6033975251

**From:** Almerindo Portfolio <almerindo@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:18:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Almerindo Portfolio  
435 E 75th St Apt 22  
New York, NY 10021  
2016169371

**From:** Yvonne Prete <ytriem@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:18:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Yvonne Prete  
22 Linden Place #8  
Brookline, MA 02445  
617-738-1910

**From:** T.Ed. Webb <mwebb18@twcny.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

T.Ed. Webb  
825 Kimry Moor  
Fayetteville, NY 13066  
3156378251

**From:** Melba Mosely <Heartsongl2@frontier.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Melba Mosely  
311 Double Branch Cove  
Franklin, NC 28734

**From:** George Koury <prosper@hvc.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:33 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

George Koury  
8 Lower Sahler Mill Road  
Sahler Mill Road  
OLIVEBRIDGE, NY 12461  
212-642-5027

**From:** georgianne ginder <gsginder@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:33 PM

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Thank you for this opportunity to comment and I look forward to your response.

georgianne ginder  
3401 old gun road west  
midlothian, VA 23113  
804-320-4975



**From:** Jack Coble <jcoblephd@bellsouth.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:33 PM

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Thank you for this opportunity to comment and I look forward to your response.

Jack Coble  
413 Hillcrest Drive  
Greensboro, NC 27403-1212

**From:** David Schachne <daveschachne@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

David Schachne  
409 State Street#1  
Albany, NY 12203  
518 465-5251

**From:** Angela Johnson <angelajohnson@carolina.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:45 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Angela Johnson  
2717 Providence Rd  
Charlotte, NC 28211

**From:** Vickie Ciuccio <ophelyavs@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Vickie Ciuccio  
250  
Mc'donald Rd Spur  
Hamden, NY 13782  
607 3637723

**From:** Douglas Allam <dja642@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:19:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Douglas Allam  
78 PELLETIER AV  
78 PELLETIER AV  
Woonsocket, RI 02895  
4017662457

**From:** Debbie Wheatley <dwheatley@stny.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:20:01 PM

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Thank you for this opportunity to comment and I look forward to your response.

Debbie Wheatley  
768 Lillie Hill Road  
Apalachin, NY 13732

**From:** Beckie Kravetz <beckiekravetz@me.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:20:27 PM

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Thank you for this opportunity to comment and I look forward to your response.

Beckie Kravetz  
PO Box 77  
Cummington, MA 01026



**From:** Rudy Hunter <rudyhunter@hvc.rr.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:20:39 PM

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Thank you for this opportunity to comment and I look forward to your response.

Rudy Hunter  
8 Lower Sahler Mill Road  
Sahler Mill Road  
OLIVEBRIDGE, NY 12461  
845 6578308

**From:** louisa Dyer <louisadyer@charter.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:20:49 PM

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Thank you for this opportunity to comment and I look forward to your response.

louisa Dyer  
28 longs chapel rd  
WEAVERVILLE, NC 28787

**From:** Ann Eastman <annkezar@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:21:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ann Eastman  
91 Matawanakee Tr.  
91 Matawanakee Tr.  
Littleton, MA 01460  
9784869284

From: Leslie Lamb <leslie@gordonswine.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:21:31 PM

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Thank you for this opportunity to comment and I look forward to your response.

Leslie Lamb  
187 ocean st  
lynn, MA 01902

**From:** Laura Goldblatt <lgoldblatt@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:21:32 PM

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Thank you for this opportunity to comment and I look forward to your response.

Laura Goldblatt  
100 Court Square Annex  
Charlottesville, VA 22902

**From:** sam banola <s\_banola@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:21:40 PM

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sam banola  
1 grandview lane  
west milford, NJ 07480

From: Oscar Ogg <oscarogg@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:22:34 PM

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Oscar Ogg  
346 Beaverkill Rd  
346 Beaverkill Rd  
Kingston, NY 12401  
8456576469



**From:** Miyako Zeng <miyakoz@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:23:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Miyako Zeng  
7370 Hilltop Dr.  
Frederick, MD 21702

**From:** Strata Chalup <strata@virtual.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:23:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Strata Chalup  
122 Vienna Drive  
Sunnyvale, CA 94089

**From:** Peter Poanessa <info@signworx.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:24:35 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Having quit the commercial fishing business because of the devastating effect of government regulations I can attest to the destruction of small local fisherman and the communities that support them as a direct result of these regulations

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Peter Poanessa  
690 Court Street  
Keene, NH 03431  
603-358-1003

From: William Leavenworth <william.leavenworth@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/01/2011 2:24:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. In 1880, the coastal fisheries of Maine alone provided a living for around 12,000 men-- nearly 7.5% of Maine's population, when the boatbuilders and sailmakers, etc., were included. Today it doesn't provide a living for more than a few hundred fishermen, and it is essentially a monoculture, waiting to be destroyed by a single virus or bacterium.

In the years in which Massachusetts offshore seiners took tens of millions of pounds of alewives, in the 1950s and 1960s, the inshore alewife fisheries collapsed in Rhode Island, Connecticut and Massachusetts.

The Gulf of Maine is depleted to less than 5% of its potential carrying capacity, thanks to otter trawlers and seiners.

In the mid-19th century, Frenchman's Bay fishermen, fishing with hooks between April and November within 25 miles of Mt. Desert Rock, took more cod than were caught in the entire Gulf of Maine the last year before quotas were in place. Last summer we fished those grounds for a week steadily and never saw a cod, in waters that had produced thousands over the same season 150 years earlier, and produced them relatively sustainably year after year.

If this mindless industrialization of the Gulf of Maine fishing grounds continues, the entire area will become a marine equivalent of the Sahara, and will not recover for decades.

DO NOT LET CATCH QUOTAS HAPPEN; nobody knows when New England will need to find food in its own coastal waters or endure famine. A healthy marine ecosystem is crucial to New England's food security.

Our research group knows as much about the history of this Gulf of Maine ecosystem as any one in the country; we can supply the catch data on 20 or more species over one hundred and thirty years, and on some species over two centuries, often by exact ground or watershed.

Thank you for this opportunity to comment and I look forward to your response.

William Leavenworth  
198 Pond Road South,  
PO box 69  
Searsmont, ME 04973  
207-342-2589

**From:** Ronald Hurston <Rhur@msn.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:24:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Ronald Hurston  
29 shaw drive  
Wayland, MA 01778

**From:** Trish Kendall <trishkendall@mac.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:24:57 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Trish Kendall  
69 Pelley  
69 Pelley St.  
Gardner, MA 01440  
9786322811

**From:** Melanie Hotchkiss <melanierosehotchkiss@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:25:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Melanie Hotchkiss  
8894 Triumphant Ct  
Walkersville, MD 21793



**From:** Janet Brodeur <janetbrodeur@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/01/2011 2:25:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Janet Brodeur  
59 Barristers Walk  
Dennis, MA 02638  
508 3856907

From: Steve Branch <shb4123@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 12:42:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Steve Branch  
88 Edgehill  
Providence, RI 02906

**From:** Erin Foley <ecf216@nyu.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 1:04:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Erin Foley  
7 Georgetown Lane  
Hazlet, NJ 07730  
7326709895

From: Kerry Anderson <kerry.frances.anderson@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 2:22:40 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kerry Anderson  
38 Western Ave  
Fairfield, ME 04937

**From:** Geraldine Schick <gschick11@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 4:05:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Geraldine Schick  
plantation st  
505 plantation st  
worchester, MA 01605

From: Robert Canelli <rcanelli@cox.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 4:05:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Robert Canelli  
plantation st  
505 Plantation St  
worchester, MA 01605  
5084591853

**From:** Karen Guancione <karenguancione@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 4:34:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Karen Guancione  
262 DeWitt Ave.  
262 DeWitt Ave  
Belleville, NJ 07109



From: chris mccully <spaceweasel@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 5:14:51 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

chris mccully  
18 highland ave  
northampton, MA 01060

From: Rebecca Fitzgerald <rjrfl4@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 5:45:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Rebecca Fitzgerald  
119 W. 4th St.  
Frederick, MD 21701

From: Alexander Hornaday <chillax.ash98@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 5:48:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Alexander Hornaday  
Brompton St.  
Springfield, VA 22152

From: nancy willard <nwillard8160@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 6:34:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

nancy willard  
8160 glasgow dr.  
laurinburg, NC 28352

From: Tierney Grinavic <tgrinavic@comcast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 6:50:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Tierney Grinavic  
4735 Paul Hance Rd  
Huntingtown, MD 20639  
410-535-3646

From: Sarah De Munck <sarah.demunck@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 8:15:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sarah De Munck  
88 Ohio Street  
Rochester, NY 14609

From: Heidi Hoffmann <HeidiKev@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 8:52:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Heidi Hoffmann  
232 Challedon Dr  
Walkersville, MD 21793-8128  
301-845-2356



From: Maki Murakami <makim@hiokiusa.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 9:34:06 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Maki Murakami  
3 Pheasant Lane  
Monroe Township, NJ 08831

From: Kimberly Wiley <kwiley16@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 12:47:59 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kimberly Wiley  
72 Chimney Hill Rd  
72 Chimney Hill Rd  
Rochester, NY 14612  
5852274544

From: Tony Buontempo <tbuontempo@peoplepc.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 5:02:04 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Tony Buontempo  
1800 Grier Ave  
1800 grier ave  
Linden, NJ 07036  
9084860688

From: C. Krimmelbein <ckrimmelbein@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 5:05:03 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

C. Krimmelbein  
421 French Partridge Lane  
421 French Partridge Lane  
Biltmore Lake, NC 28715  
8286651230

From: Athena Batsios <guns6n6roses6@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 12:42:28 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Athena Batsios  
25 Lake Ave  
25 Lake Ave  
Nassau, NY 12123  
518-248-8618

From: Cassandra Chen <cassiechen98@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 12:44:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Cassandra Chen  
32 Briarhurst Dr  
Tonawanda, NY 14150  
585-278-6532

From: J. Adam Bailey <bajadam2002@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 12:55:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

J. Adam Bailey  
8 South Cross Rd.  
Gill, MA 01354



From: Therese Wilson <theresew2003@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 1:24:05 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Therese Wilson  
2066 Mecklenburg Rd.  
Ithaca, NY 14850-9357

**From:** meryl dror <meryljoy@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 1:05:47 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

meryl dror  
351 richard ct  
pomona, NY 10970  
9144190750

From: julie phalon <juliephalon@msn.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 1:45:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

julie phalon  
13031 brookmead dr  
manassas, VA 20112  
703-791-2788

From: Jordan Lahanas <jkl3092@rit.edu>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 1:43:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jordan Lahanas  
1395 Genesee St  
Rochester, NY 14611

From: david j. lafond <djlafond@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 3:14:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

david j. lafond  
70 Brown Avenue  
Holyoke, MA 01040-3502  
413-534-1736

From: ryan master <ryanmaster2002@aim.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 3:19:34 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

ryan master  
1424 tunbridge rd # 10  
lynchburg, VA 24501

From: Helga Spector <helspec@comcast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 12:10:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Helga Spector  
28 Spring St.  
Somerset, NJ 08873  
(732) 828-6471



From: Angelica Falcinelli <afalcine@smith.edu>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 12:34:36 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Angelica Falcinelli  
302 Broadway  
1 Chapin Way  
Ulster Park, NY 12487  
8453090606

**From:** Elaine Ruocco <e.ruocco@kennedyhealth.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 12:38:47 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elaine Ruocco  
201 Laurel Oak Rd  
Voorhees, NJ 08043

**From:** Scott Simontacchi <scott.j.simontacchi@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 12:49:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Scott Simontacchi  
25 Granada Drive  
Morris Plains, NJ 07950

From: Susan Lubianez <lubianes@ummmhc.org>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 12:42:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Susan Lubianez  
16 Wakefield st  
Worcester, MA 01605

From: Capt. Leslie davis sr <info@captstacy.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 1:08:36 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.  
Capt. Leslie M. Davis Sr.

Capt. Leslie davis sr  
p.o. box 3013  
atlantic beach, NC 28512

From: laura spickett <lauramicaell@hotmail.co>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 1:19:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

laura spickett  
5022-12 hunt club road  
wilmington, NC 28405  
2527254373

From: Linda Morey <lmorey52@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 2:06:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Linda Morey  
16 delta  
oxford, NJ 07933  
908 647 4194



From: Catherine Ramirez <ChibiK629@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 2:25:51 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Catherine Ramirez  
754 Union St  
Rahway, NJ 07065

From: patty campbell <patty.treespirit@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 2:37:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

patty campbell  
378 Broadway  
Apt A  
Saratoga Springs, NY 12866  
518-583-4104

From: Marianne Mukai <mmukai@stny.rr.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 4:07:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for your attention and for this opportunity to comment and I look forward to your response.

Marianne Mukai  
20 Elm St  
Delhi, NY 13753

From: Micheline Cipoletti <mirocip@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 4:12:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Micheline Cipoletti  
65RevereDrive  
65 Revere Drive Sayville N.Y.  
Sayville, NY 117821354

From: Emily Doutre <edoutre@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 4:47:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Emily Doutre  
5 Irving Street, #3  
#3  
Somerville, MA 02144  
4844672506

From: Oswald Sykes <stingray53@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 5:00:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Oswald Sykes  
P.O. BOX 189  
P.O. Box 189, Delmar, New York 12054  
DELMAR, NY 12054  
5184394121

From: Barbara Williams <Barbwilliams44@suddenlink.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 5:49:14 PM

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Thank you for this opportunity to comment and I look forward to your response.

Barbara Williams  
203 Nyon Court  
203 NYON COURT  
New Bern, NC 28562  
252 634-9733



**From:** Stephen Evans <outhouse161@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 5:49:57 PM

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Thank you for this opportunity to comment and I look forward to your response.

Stephen Evans  
161 Spring Lane  
Paramus, NJ 07652

From: Karen Kan <karenkanmd@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 6:09:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Karen Kan  
P.O.BOX 525  
Lake Placid, NY 12946  
5185248188

**From:** diane schabowski <trennax@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 7:38:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

diane schabowski  
35 circle dr  
west springfield, MA 01089

From: karen frame <karen\_frame@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 9:09:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

karen frame  
75 Central Parkway  
Huntington, NY 11743-4308  
(631) 673-0932

**From:** sawatdee sanlavun <sanlavun@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/05/2011 12:47:32 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

sawatdee sanlavun  
4504 gridley rd.  
silver spring, MD 20906

From: Angela Brust <angelabrust@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 10:55:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Angela Brust  
60 George St  
Green Island, NY 12183

From: Elizabeth Elkind <lizelkind@rocketmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 12:51:16 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Elizabeth Elkind  
2800 N Yucatan St  
Arlington, VA 22213



**From:** Thomas Wilson <balTHOMore@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/05/2011 3:40:49 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Thomas Wilson  
1161 Quantril Way  
Baltimore City  
Baltimore City, MD 21205-3254  
4100000000

From: Brad Knopf <bdknopf@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 7:47:11 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Brad Knopf  
1018 Magothy Park Ln  
1018 Magothy Park Ln  
Annapolis, MD 21409  
4107577992

From: Taylor Brown <tdb419@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 4:44:02 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Taylor Brown  
77 L Street  
Haverhill, MA 01835

From: Kathleen Hastings <kathleen.1.hastings@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 10:15:55 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kathleen Hastings  
133 Livingston St Apt 3  
Apt 3  
Buffalo, NY 14213  
17165158483

**From:** Robert Carr <joehawken100@indylink.org>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/05/2011 10:23:18 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Robert Carr  
PO Box 184  
97 Hendl Way  
Leicester, NC 28748  
8286836090

From: Penelope Lord <penraven@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 10:42:02 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Penelope Lord  
P.O. Box 746  
12 Beacon Hill  
Housatonic, MA 01236  
4132741030

From: Jericho Jebidiah <chaolan00@tekken.cc>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 10:52:04 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jericho Jebidiah  
746 Walter Ave.  
Baltimore, MD 21901



From: kelly gay <diceysemantics@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 12:25:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

kelly gay  
5409 stuart's ridge rd  
wake forest, NC 27587

From: Virginia Allen <ginnyallen10k@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 12:32:51 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Virginia Allen  
10 K Sandstone Court  
Apt. K.  
Annapolis, MD 21403

From: Rev. Mindy Yanish <msy34@msn.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 1:10:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Rev. Mindy Yanish  
44 Lily Pond Lane  
Katonah, NY 10536

From: Ann Albrecht <ann\_albrecht@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 12:47:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ann Albrecht  
14 Virginia Ave  
Staunton, VA 24401

From: Elizabeth Fitzgerald <widgekit@embarqmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 2:06:07 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elizabeth Fitzgerald  
535 Willwood Drive  
Earlysville, VA 22936

From: Catherine Brower <catb712@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 2:11:11 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Catherine Brower  
130 Driftwood Drive  
Bayville, NJ 08721

From: Leo Ahumada <bpa\_leo@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 2:20:44 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Leo Ahumada  
901 High Meadow Lane  
Yorktown Heights, NY 10598  
718-353-3720



From: Stephen Konarik <Stephenk12@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 2:26:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Stephen Konarik  
7788 Marshall heights ct  
7788 Marshall heights ct falls church va 22044  
Falls church, VA 22043

**From:** DYPNA HOLLIDAY <BILLIE10509@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/05/2011 3:52:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

DYPNA HOLLIDAY  
BLOOMER RD  
49 BLOOMER RD  
BREWSTER, NY 10509-1025

From: Hal Trufan <htrufan@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 4:14:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Hal Trufan  
6808 Old Forge Dr  
Charlotte, NC 28226  
7045570001

From: Sydney Dunlap <sydneydunlap@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 6:56:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sydney Dunlap  
106 Richard Drive  
Leesburg, VA 20175  
703-779-1066

From: Madeline Loder <mads425@comcast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 6:38:39 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Madeline Loder  
425 Maple Rd  
Longmeadow, MA 01106  
413 567 2154

**From:** Melissa Gumbert <gumbertm@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/05/2011 8:20:41 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Melissa Gumbert  
120 Berry Creek Dr  
120 Berry Creek Dr  
Flat Rock, NC 28731

**From:** Kathleen Leatherwood <lwoods34@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/05/2011 9:56:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kathleen Leatherwood  
1621 Greenbriar Ct  
1621 Greenbriar Ct  
Reston, VA 20190  
(703) 707-9602



From: John Pittenger <johnpittenger@rocketmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 9:38:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

John Pittenger  
54 A Hudson Parkway  
Whiting, NJ 08759-6303  
908-475 1106

From: Geoffrey Hubbs <geoffhubbs@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 10:21:21 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Geoffrey Hubbs  
1521 Tremont Road  
1521 Tremont Road  
Seal Cove, ME 04674  
2074792788

From: CAROL DAVIS <cjtdavis@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 11:34:41 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

CAROL DAVIS  
4 Littlefield Lane  
Scarborough, ME 04074

From: Ming Chen <maggiekaspen@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 10:50:52 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ming Chen  
23102 Timber Creek Ln  
Clarksburg, MD 20871  
301-704-8387

**From:** Joseph Egerton <zanel348@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 11:52:44 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Joseph Egerton  
2705 Mayfair Dr.  
Wilmington, NC 28403  
910-232-9711

**From:** Edmond Malone <edmalone1215@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 9:45:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Edmond Malone  
4 Locust Ave. E.  
West Harrison, NY 10604

**From:** Doug Morris <dfreshmorris@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 10:14:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Doug Morris  
324 Tern Ct  
Kill Devil Hills, NC 27948



From: Mark Barta <mrbarta@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 10:27:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mark Barta  
844 Garden Ave  
Olean, NY 14760  
7169945498

**From:** Miriam Devlin, M.D. <crowmother@earthlink.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 11:15:19 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Miriam Devlin, M.D.  
46 Charlie Star lane  
Orland, ME 04472

From: brian fallon <briantfallon@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 11:27:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

brian fallon  
643 west commodore blvd  
jackson, NJ 08527  
732 961-7098

From: Thomas Laco <alaco423@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 11:28:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Thomas Laco  
603 Sasser St.  
Raleigh, NC, NC 27604  
828.719.0814

From: Stefanie Royal <ladyroyal@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 11:50:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Stefanie Royal  
3221 Clifftmont Ave  
Baltimore, MD 21213

From: lea mac leod <jumeau5341@AOL.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 1:15:56 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

lea mac leod  
239 princeton ave.  
#3  
amherst, NY 14226-3064  
716-832-0958

**From:** Laura Stringer <theavonchica@aol.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 1:57:12 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Laura Stringer  
166 mike ct  
n/a  
Elkton, MD 21921  
4439451263



**From:** Ann Marie Dunn <amd57432@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 5:15:49 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ann Marie Dunn  
1186 Thornhill Dr  
Sylva, NC 28779  
7571234567

**From:** Benjamin Lascelle <benlascelle@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 6:41:42 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Benjamin Lascelle  
59 W River Dr. Apt. 39  
Manchester, NH 03104-1991  
8573666578

From: Elaine Annunziata <magicmaker500@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 7:38:40 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Elaine Annunziata  
20 Jessup Ln  
Stony Point, NY 10980  
845-942-2391

From: deborah eisenberg <deb929@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 7:51:47 AM

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Thank you for this opportunity to comment and I look forward to your response.

deborah eisenberg  
929 N sanford Rd  
929 N Sanford Rd  
afton, NY 13730  
607-467-5472

**From:** Eileen Decker1 <eileendecker@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 7:58:00 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Eileen Decker1  
159 S. 2nd St.  
Lindenhurst, NY 11757  
6318880179

From: Bonnie Wise <bonwise@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 8:05:11 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Bonnie Wise  
7607 boulevard east  
Second Floor  
north bergen, NJ 07047  
201-987-0987

**From:** Sharon Boxley <shar881@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 9:00:36 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sharon Boxley  
PO Box 1301  
Marlton, NJ 08053



From: Betty Ford <bfordx2@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 8:32:53 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Betty Ford  
12603 Dawnridge Ct.  
Midlothian, VA 23114

From: Matt Stedman <matt@nativeplants.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 9:22:26 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Matt Stedman  
23 Gloucester Avenue  
Montauk, NY 11954-5237  
6316686124

**From:** Jacqueline Birnbaum <jacqueline.birnbaum@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 9:37:13 AM

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Jacqueline Birnbaum  
311 Bronxville Road  
Bronxville, NY 10708  
914-961-6953

From: Mary Heaton <meheatie@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 9:40:13 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Mary Heaton  
6 Northrup Ave  
Norwich, NY 13815  
607 3344876

From: Christopher Camaione-Lind <c\_lind198@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/04/2011 11:04:19 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Christopher Camaione-Lind  
108 Asbury Street  
Rochester, NY 14620

**From:** Tarek Pertew <tpertew@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 11:17:54 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Tarek Pertew  
Joralemon Street  
Brooklyn, NY 11201

From: Mary Anne McCormack <mamc1500@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 6:08:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Mary Anne McCormack  
1500 Route 9G  
Hyde Park, NY 12538  
845-233-4703



From: W.Vanessa Pomales <vanessa.pomales@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 6:43:10 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

W.Vanessa Pomales  
92 10th Street  
Buffalo, NY 14201-1919  
716-854-3196

From: Ann Lamb <AREBECCALAMB@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:05:48 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ann Lamb  
2101 Broadway Apt 47  
Watervliet, NY 12189

From: Kiel Grosch <nj727pilot@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:26:23 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kiel Grosch  
134 RT.645  
Sandyston, NJ 07826

From: maryke petruzzi <pnkrvr@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:28:54 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

maryke petruzzi  
208 radcliff dr  
nyack, NY 10960

From: Bert Morris <bert1011@earthtones.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:36:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Bert Morris  
76 Mountain Avenue  
Millburn, NJ 07041-2115  
Phone

From: Matt Candelora <mattcandelora@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:37:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Matt Candelora  
69 Rutland Street  
Malden, MA 02148  
781 2236263

From: Laura Frame <framelc@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:41:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Laura Frame  
75 Central Pkwy  
Huntington, NY 11743  
631-912-6691



From: Hannah N Dring <hndring@skassen.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:38:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Hannah N Dring  
17 Skassen Lane  
17 Skassen Lane  
Harpwell, ME 04079

**From:** Denise Bence <denise818@care2.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 7:42:55 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Denise Bence  
P.O.Box 274  
W.Hyannisport, MA 02672

From: Melissa Bishop <mmorga10@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 7:46:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Melissa Bishop  
24 Church St.  
Deposit, NY 13754  
(607) 217-9145

From: Evelyn Griffith <jancole49@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 8:15:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Evelyn Griffith  
5044 Tara Dr  
Fredericksburg, VA 22407  
540 786 4246

**From:** David Stewart <lildstew@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 7:51:18 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

David Stewart  
22 Shaw Drive  
Rochester, NH 03868  
603-978-3306

From: Donald Harland <dharland1@hughes.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 8:38:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Donald Harland  
PO Box 2080  
Candler, NC 28715  
828-665-9247

**From:** June Perez <Junepererez@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 8:43:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

June Perez  
328 Elm Ave  
Nj, 08016  
Burlington, NJ 08016  
732-226-3643



**From:** david Paquette <davidpaquettejr@comcast.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 8:44:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

david Paquette  
41 methuen st  
apt 531  
lowell, MA 01854

**From:** Sue Osborn <ozvorn@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/03/2011 9:28:52 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Sue Osborn  
120 Brook st.  
120 Brook st.  
Hilton, NY 14468

From: Harry Aceto <haceto@earthlink.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 9:31:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Harry Aceto  
411 willow ave.  
411 willow ave.  
Ithaca, NY 14850  
607-273-9788

From: Janet Baer <jbaer@starband.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 6:54:12 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Janet Baer  
3227 Sharon Road  
Jarrettsville, MD 21084-1730  
410-692-2820 PM

From: Jeanne Jacobowitz <jeannejacobo@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/05/2011 10:14:51 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jeanne Jacobowitz  
1256 Route 23  
Craryville, NY 12521

**From:** Paul Cobb <pcobb@iamnow.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 12:24:39 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Paul Cobb  
31 Water St. Cot. 7  
Cot 7  
Bradford, NH 03221-3328

From: Dave Neumyer <tidal.2step@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 4:00:06 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Dave Neumyer  
356 Rosebank Ave  
Baltimore, MD 21212  
4103231392



From: Vincent Colletti <vinnycolletti@netscape.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 4:28:48 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Vincent Colletti  
51 Maple St  
Oneonta, NY 13820  
607-433-1956

**From:** KJ Ficker <venus\_617@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 8:10:17 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

KJ Ficker  
22183 Winter Lake Ct.  
Ashburn, VA 20148

From: Ruth Swilley <rswilley@comcast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 8:24:46 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ruth Swilley  
5670 Singletree Drive  
Frederick, MD 21703

From: gwen straub <gwenpstraub@frontier.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 10:19:04 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

gwen straub  
27 magnolia dr  
27 magnolia dr  
nebo, NC 28761-9533  
828 652-0088

From: Jessica Gotsch <jess13649@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/06/2011 10:06:32 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jessica Gotsch  
99 baker st.  
Belmont, MA 02478  
617-755-5286

**From:** Ming Chen <maggiekaspen@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/06/2011 10:49:03 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ming Chen  
23102 Timber Creek Ln  
Clarksburg, MD 20871  
301-704-8387

From: Edward Herbst <edwardherbst7@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 8:16:21 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Edward Herbst  
621 Algerie Rd  
621 Algerie Rd., E. Otis, MA  
East Otis, MA 01029  
413-269-4201



**From:** Sumera Foley <sumerafoley@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/04/2011 9:05:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Sumera Foley  
19 Kent Rd  
Red Hook, NY 12571

From: Joy Labudzinski <jateneyck@verizon.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 5:47:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Joy Labudzinski  
110 Sleight Plass Rd  
Poughkeepsie, NY 12603

From: Vasilios Kovoros <NYCVasilis@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/03/2011 6:03:14 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Vasilios Kovoros  
1207 Whitehall Lane  
Wantagh, NY 11793

**From:** Roberto Sandoval <Satori310@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/08/2011 9:03:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Roberto Sandoval  
517 East 77th St Apt 4D  
New York, NY 10075

**From:** Martin Mendelsohn <martinsandy@cox.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/07/2011 3:21:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Martin Mendelsohn  
303 Brooke Ave # 203  
303 Brooke Ave # 203  
Norfolk, VA 23510  
your phone numbe

From: Jennifer Baker <j\_\_baker@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 4:12:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jennifer Baker  
1600 South Eads St.  
Arlington, VA 22202

**From:** Ron Gordon <rongordon@quicksilveronline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/07/2011 8:02:54 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ron Gordon  
6371 Generals Court  
Centreville, VA 20121



From: Heather Barton <hbspring@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 8:58:01 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Heather Barton  
1 Woodland Rd  
Beacon, NY 12508  
845-440-6411

**From:** Lindsey McKay <plantedbytheriver@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/07/2011 9:22:07 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Lindsey McKay  
4321 DYER CT  
RALEIGH, NC 27604  
919.827.5135

From: Marilyn Mills <mgmtherd@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 9:18:45 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Marilyn Mills  
263 Kenberma St  
Manchester, NH 03103

From: debra wicks <yuwraam@msn.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 9:47:17 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

debra wicks  
346 princeton avenue, apt. 6  
apt. # 6  
jersey city, NJ 07305  
201-985-9496

From: Scott Stanley <sostan268@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 11:21:50 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Scott Stanley  
4 norwood st  
1  
portland, ME 04103

**From:** Vijayan Daniel <vjdaiel@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/07/2011 12:17:15 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Vijayan Daniel  
229 Strawtown Rd  
New City, NY 10956

From: K Muccillo <kmuccillo@morrisparks.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 12:16:20 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

K Muccillo  
353 East Hanover Avenue  
353 East Hanover Avenue  
Morristown, NJ 07960  
(973) 326-7601



From: Jennifer Menite <jenn@totalrestorationinc.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 12:34:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jennifer Menite  
9A Duke Street  
Bay Shore, NY 11706

From: Laurie B. Lewis <lewislaurieb@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 1:10:47 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Laurie B. Lewis  
14 Walnut St.  
Shrewsbury, MA 01545  
5088421751

From: jessica acree <jva712@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 2:15:46 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

jessica acree  
167 Oakleaf Drive  
Pine Knoll Shores, NC 238512

From: Shelley Ottenbrite <tiddas@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 2:55:20 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Shelley Ottenbrite  
1809 W Grace St  
Richmond, VA 23220  
804-901-9334

From: Jeremy Crytzer <jeremy@jcrytzerwoodworking.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/10/2011 10:42:56 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Jeremy Crytzer  
8202 Route 96  
Interlaken, NY 14847

From: Jane Goebel <Birder665@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/07/2011 9:31:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

Jane Goebel  
142 Morley Circle  
142 Morley Circle, Melville, NY 11747  
Melville, NY 11747-4843

**From:** Kimberly Spiegel <kspiegel82@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/08/2011 1:54:59 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Kimberly Spiegel  
2204 Evergreen Drive  
Folsom, NJ 08037



From: Conway Moy <conway.moy@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/08/2011 3:18:39 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Conway Moy  
PO Box 11  
Ninde, VA 22526

From: Amy Lippert <amy\_lippert@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/08/2011 12:28:50 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Amy Lippert  
108 Trowbridge St.  
Apt. 3  
Cambridge, MA 02138

**From:** Helen Hillebrand <helen.hillebrand@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/08/2011 2:55:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Helen Hillebrand  
605 Pershing Dr  
Silver Spring, MD 20910

From: Briana Wagner <peachy4543@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/08/2011 2:13:16 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Briana Wagner  
15610 National Pike  
Hagerstown  
Hagerstown, MD 21740  
3015823637

From: ken lavacca <raiders84@comcast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/08/2011 2:41:02 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

ken lavacca  
34 olive st.  
bloomfield, NJ 07003

**From:** Michael Bilecki <mbilecki@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/08/2011 9:24:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Michael Bilecki  
31 Locust Road  
Brookhaven, NY 11719  
631-286-3379

From: Brian Baublitz <brian@baublitz.org>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/08/2011 4:15:25 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Brian Baublitz  
1004 Hidden Moss Dr  
Hunt Valley, MD 21030  
(443) 353-9074



**From:** patricia poteat <rajial@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/08/2011 4:27:08 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

patricia poteat  
12 parker ave  
2nd floor  
westfield, MA 01085  
4136260706

From: Susie O'Keeffe <smokeeffe@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/13/2011 6:21:29 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Susie O'Keeffe  
181 Goosepecker Ridge Rd  
Montville, ME 04941  
207 382 3094

From: Karen Now <Nowsey@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/11/2011 10:28:52 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Karen Now  
284 fair haven rd  
fair haven rd  
Fair haven, NJ 07704  
7325307821

From: Nicole Gillespy <strangeomens@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/11/2011 8:32:01 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Nicole Gillespy  
426 S.Coles Ave.  
Maple Shade, NJ 08052

From: Frank Smith <Franksmith630@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/11/2011 9:23:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Frank Smith  
1906 Park Avenue  
Baltimore, MD 21217  
410-523-7789

From: Heidi Salzgeber <heidi.salzgeber@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/12/2011 12:42:09 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Heidi Salzgeber  
8704 Natures Trail Ct  
Unit 303  
Odenton, MD 21113

From: susan mcombs <suemcombs@att.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/12/2011 11:49:25 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

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Thank you for this opportunity to comment and I look forward to your response.

susan mcombs  
12 reed lane  
bedford, MA 01730  
781-275-5385



From: Jessie Myrie <jbmyrie@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/12/2011 7:03:00 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Jessie Myrie  
48 Davis Avenue  
Hackensack, NJ 07601

From: Tony Maiuro <tmaiuro@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/13/2011 9:03:50 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Tony Maiuro  
14 Oak Lane  
Wharton, NJ 07885  
973-361-6860

From: Marla Bottesch <snowbook@kynd.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/13/2011 11:06:08 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Marla Bottesch  
P.O.Box 458  
Norridgewock, ME 04957

**From:** Julia Smath-LeFebvre <editing4u@optonline.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/13/2011 5:06:47 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Julia Smath-LeFebvre  
1709B Half Moon Bay Drive  
Croton-on-Hudson, NY 10520  
(914) 827-9095

From: Liz Dyer <edyer1@cavtel.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/10/2011 12:50:59 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Liz Dyer  
2161 Woodlawn Ave  
Virginia Beach, VA 23455  
425-2123

**From:** Greg Proulx <gg.proulx@verizon.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/10/2011 4:11:31 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Greg Proulx  
137 Cambridge Turnpike  
Concord, MA 01742  
(978) 505-8034

**From:** Shelley Ottenbrite <tiddas@hotmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/09/2011 2:55:20 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Shelley Ottenbrite  
1809 W Grace St  
Richmond, VA 23220  
804-901-9334



**From:** Denise Hart <denisehart1000@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/09/2011 8:44:01 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Denise Hart  
P.O. Box 575  
Barrington, NH 03825  
2026834987

From: Ruth Kram <ruthkram@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 11:51:58 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Ruth Kram  
111 Coccio Drive  
West Orange, NJ 07052  
973 736-9278

From: Chrysanthia Rice <chrysanthia.rice@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 12:00:06 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Chrysanthia Rice  
806 Houston Ave.  
Takoma Park, MD 20912

From: linda hiers <lghiers@windstream.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 1:43:34 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

linda hiers  
201 South Ave.  
jamestown, NY 14701

From: Martha Hancock <mhancoc9@uncc.edu>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 3:24:12 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Martha Hancock  
1911 Crandon Dr.  
Charlotte, NC 28216

From: T.E. Perkins <tielperkins@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 4:36:30 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

T.E. Perkins  
118 bedford avenue  
Teaneck, NJ 07666

From: steven kroeger <stevenrolfkroeger@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 7:24:35 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

steven kroeger  
29 benson  
29 benson st  
albany, NY 12206  
5284888833



From: Linsi Deyo <linsi@zafu.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/09/2011 5:53:40 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Linsi Deyo  
289 Twilight Way  
Burnsville, NC 28714  
828-675-1235

From: Holly Kest <Hollyagar@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/10/2011 1:43:26 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Holly Kest  
24 pasture ct  
Ledgewood, NJ 07852  
7272153290

**From:** Ben Margolis <bmargoli@email.unc.edu>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/13/2011 8:32:27 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Ben Margolis  
409 Palmspring Drive  
#16  
Gaithersburg, MD 20878

From: Audrey David <writeali@optonline.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/13/2011 5:46:50 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Audrey David  
10 Stewart Place, #9GW  
10 Stewart Place  
White Plains, NY 10603  
914-8374310

From: Marianne Comfort <mcomfort@sistersofmercy.org>  
To: monkfisha6@noaa.gov  
Subject: I oppose catch shares for monkfish  
Date: 02/02/2011 8:46:55 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Marianne Comfort  
7311 Flower Ave.  
Takoma Park, MD 20912

**From:** Sandra O'Rourke <sandycares@taconic.net>  
**To:** monkfisha6@noaa.gov  
**Subject:** I oppose catch shares for monkfish and in general  
**Date:** 02/01/2011 3:35:37 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

For one, catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Perhaps most disturbingly, catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

Further, if the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Sandra O'Rourke  
3892 County Route 9  
East Chatham, NY 12060  
5187949247

From: Kathey Brodtman <kwb@kaballero.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/22/2011 1:22:43 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Kathey Brodtman  
247 Sunrise Ct.  
Lottsburg, VA 22511



From: Adriana Di Cecco <adicecco@mindspring.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/22/2011 4:36:55 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Adriana Di Cecco  
P.O. Box 228  
-  
Topsfield, MA 01983  
978-887-9494

From: Lisa Tondo <Liat11@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/22/2011 5:28:42 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Lisa Tondo  
4 Steinway ct  
4 Steinway court  
Suffern, NY 10901  
Phone

From: Janet Dunkelberger <dunkelberger@juno.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for fish  
Date: 02/01/2011 2:37:15 PM

I am writing to express my opposition to the development of a catch share program to regulate fishing in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Janet Dunkelberger  
801 S 25th St  
Arlington, VA 22202

From: Joan Reynolds <eliot.maine@hotmail.com>  
To: monkfisha6@noaa.gov  
Subject: No to Catch Shares  
Date: 02/12/2011 1:31:11 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Joan Reynolds  
114 Circuit Ave  
Weymouth, MA 02188

From: Michael Amendolare <mpa1480@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: No subject  
Date: 02/04/2011 7:40:20 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Michael Amendolare  
431 Blooming Grove Tpke  
apt 33  
New Windsor, NY 12553

From: Richard Norman Talley <rtalley@gmail.gwu.edu>  
To: monkfisha6@noaa.gov  
Subject: No to Catch Shares for Monkfish  
Date: 02/22/2011 9:16:13 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish will have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Richard Norman Talley  
2610 Urbana Dr  
Silver Spring, MD 20906

From: Sarah Reid <SarahRoseReid@Gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/22/2011 10:20:29 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Sarah Reid  
105 Sheldon Road  
Ithaca, NY 14850-2501



From: Greg and Karen Federico <gkfederico@comcast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/22/2011 4:25:53 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Greg and Karen Federico  
185 Fountayne Lane  
Lawrenceville, NJ 08648  
609-716-0491

From: Emily Flynn <e.m.flynn@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/15/2011 9:18:44 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Emily Flynn  
5 Eaton Lane  
Pittsfield, MA 01201  
4134466326

From: L E Payne <touchedpainter@metrocast.net>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/15/2011 2:42:03 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

L E Payne  
New Orchard  
Epsom, NH 03234  
6037368847

**From:** Christopher Needham <christopher.david.needham@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/15/2011 3:50:26 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Christopher Needham  
130A West All Saints Street  
Frederick, MD 21701

**From:** steven burke <steveburke22@gmail.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/15/2011 10:57:22 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

steven burke  
418 South 7th St.  
Wilmington, NC 28401  
704-606-5140

From: Patricia Pierre <patriciafpierre@aol.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/16/2011 8:40:38 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Patricia Pierre  
10 HARTLEY CIR., APT 635  
APT 635  
OWINGS MILLS, MD 21117  
6465228352

From: Kristin DeValue <kristin.devalue@gmail.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/17/2011 8:58:18 AM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Kristin DeValue  
55 Leonard Drive  
Wyckoff, NJ 07481



From: Helena Donovan <fhdonovan@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/17/2011 6:18:56 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions,

Catch shares threaten the ability of small-scale fishermen to make a living. Introducing a plan for monkfish could have disastrous consequences by reducing jobs in coastal communities reliant on a diverse fishing fleet and active ports. Catch shares result in the consolidation of the fishery, driving out those who cannot pay the high price of shares.

Catch shares essentially privatize access to fishing, facilitating the control of our fisheries by private interests. But our fisheries are a public trust resource and should be managed as such.

If the councils move forward with a catch share program, they should adopt a Fair Fish approach that does not privatize the resource. Shares should not be transferable, prices for quota should create incentives to maintain the participation of small-scale fishermen and the public should be ensured a fair return for the use of their resource.

Thank you for this opportunity to comment and I look forward to your response.

Helena Donovan  
27 Montague Road  
Amherst, MA 01002

From: Kimberly Jenkins <willowdrala13@yahoo.com>  
To: monkfisha6@noaa.gov  
Subject: Opposition to catch shares for monkfish  
Date: 02/18/2011 11:19:05 AM

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Thank you for this opportunity to comment and I look forward to your response.

Kimberly Jenkins  
P.O. Box 9314  
P.O. Box 9314  
Silver Spring, MD 20916  
3015231840

**From:** Monica Ferris <mrsci99@yahoo.com>  
**To:** monkfisha6@noaa.gov  
**Subject:** Opposition to catch shares for monkfish  
**Date:** 02/20/2011 7:56:48 PM

I am writing to express my opposition to the development of a catch share program to regulate monkfish in the Mid-Atlantic and New England regions.

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Thank you for this opportunity to comment and I look forward to your response.

Monica Ferris  
8 Fairfax Pl  
Utica, NY 13502