



Small Mesh Multispecies Fishery Management Plan
Comments received via email, fax or letter
Public comment period open May 15 – June 16, 2006

Six individuals and one organization provided written comments on the proposed Small Mesh Multispecies management action (Amendment 14 to the Northeast Multispecies Fishery Management Plan). Comments were received by:

- (1) Gib Brogan, Oceana – Mystic, Connecticut
- (2) Brendan Casey, F/V Sea Angel – Centerport, New York
- (3) Charles Etzel – Montauk, New York
- (4) David Goethel, F/V Ellen Diane – Hampton, New Hampshire
- (5) James Lyons, F/V Edna Mae – Nichols, New York
- (6) BL Sachau – Florham Park, New Jersey
- (7) Edward Todd, F/V Alliance – Wakefield, Rhode Island

Four specific issues for public comment were included in Notice of intent to prepare a supplemental environmental impact statement and request for comments. Those issues are:

- (1) Limited entry in the Small Mesh Multispecies fishery
- (2) Hard total allowable catch (TAC)
- (3) Possible restrictions on the juvenile whiting fishery
- (4) Dedicated access privileges

Summary of written comments

Comments were received from as far north as New Hampshire and as far south as Long Island, New York. All seven comments pertained directly to at least one of the issues to be addressed in scoping, and four addressed all four issues.

Limited entry was addressed in five commenter letters. Four commenter's were in favor of limited entry, and one was opposed. All those in favor of limited entry supported the control date for qualification purposes, and all recommended a qualification inception date between 1994 and 1996. Two commenter's were in favor of separate qualification criteria for the northern and southern areas. Minimum poundage requirement recommendations ranged from 100,000 to 500,000 pounds in any one year for qualification in the southern area, and from 50,000 to 500,000 pounds for the northern area. One commenter felt that percentage of total fishing within the small mesh multispecies fishery should be a factor in allocating limited access permits, while four felt that allocations should be based solely on landings history.

Four commenters addressed hard TACs. One was against, one was in favor and one was “not necessarily opposed” to the idea of a hard TAC. The fourth commenter, who stated “cut all quotas by 50%,” is difficult to categorize, but may be presumed to be in favor of hard TACs. One commenter stated a preference for individual TACs for each species and stock area (that would be six separate TACs) in addition to bycatch TACs for both small mesh multispecies and other species caught in this fishery. Another commenter, who was opposed, stated that if overfishing were to occur in the future under a limited access program, hard TACs should then be considered. The third commenter was awaiting an explanation of how to implement hard TACs given the lack of guidance available via the most recent stock assessment. The recreational fishery was not discussed in any comment letters, nor were mechanisms for limiting or preventing derby-style fishing practices under a TAC.

Four commenters provided thoughts on possible restriction on fishing for juvenile small mesh multispecies. Three of the commenters expressed a desire to avoid taking juvenile fish, but all four opposed minimum fish size restrictions (one commenter made no preference regarding the taking of juveniles, but opposed a minimum size). Three of the four favored mesh size as the preferred mechanism for avoiding juveniles, while one favored the raised footrope trawl.

Four of the seven commenters addressed dedicated access privileges. Of the four, one preferred to wait until after limited entry was enacted before allowing for sectors or transferable shares, while the other three were opposed to “ITQs” or other forms of dedicated access privileges in general.