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Subject: comments on monkfish FW5 proposed rule

Date: Tue, 11 Mar 2008 16:55:00 -0400

From: Maggie Raymond <maggieraymond@comcast.net>

To: Pat Kurkul <Pat.Kurkul@noaa.gov>, Allison McHale <Allison.McHale@noaa.gov>

CC: Marc Agger <marcagger@gmail.com>

March 11, 2008

Ms. Patricia Kurkul, Regional Administrator
National Marine Fisheries Service

Dear Pat:

We write, on behalf of Associated Fisheries of Maine (AFM) and the Monkfish Defense Fund (MDF) to comment on framework adjustment 5 to the monkfish fishery management plan. Members of AFM and MDF are economically dependent on a sustainable monkfish resource.

/_1) Revision of biological reference points_/

AFM/MDF concurs with the proposal to revise the biological reference points contained in the FMP to be consistent with those recommended in the July, 2007 assessment report. Severe restrictions on the fishing industry, over several years, affecting both monkfish and groundfish harvesters, has resulted in a determination that the stock is rebuilt ahead of schedule and that overfishing is not occurring in both management areas. Our members are among the many whose sacrifices have contributed to this positive outcome.

Due to the health of the resource, we are, however, disappointed that the existing restrictions on the fishery will not be reviewed any time soon to determine if they continue to be warranted in light of the July 2007 assessment. We do believe the Councils and the NMFS have an obligation to re-evaluate the appropriateness of the existing restrictions, even if the purpose is simply to mitigate the potential for discards (inherent in trip limit controls).

/_2) Reduction in carry-over DAS_/

In light of the July 2007 stock assessment, AFM/MDF contends that the proposed reduction in carryover DAS is not justified.

/_3) Revision to DAS counting provision for day gillnet vessels_/

AFM/MDF supports the proposal to require all monkfish gillnet trips of less than 15 hours in duration to be charged 15 hours, notwithstanding our long held position that minimum DAS charges should not apply to trip gillnet vessels. Exploitation of the 3-hour time window, by certain vessels, in order to maximize landings is completely contrary to the intended safety intent of this provision, and obviously has the potential to undermine the biological objectives of the FMP.

/_4) Revision to the incidental catch limit in the SFMA_/_

AFM?MDF supports the proposal to revise the incidental catch limit for large-mesh vessels in the SFMA.

/_5) Revision to LOA requirement_/_

AFM/MDF supports the proposal to eliminate the requirement to obtain a monkfish LOA to fish under the less restrictive management measures of the NFMA for vessels using a vessel monitoring system. This administrative burden is made obsolete by the use of the VMS.

As always, we appreciate your consideration of our views.

Sincerely,

Maggie Raymond
Associated Fisheries of Maine

Marc Agger
Monkfish Defense Fund