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Attn: ALWTRP Scoping

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Ms. Colligan,

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I appreciate this opportunity to provide input regarding the ongoing efforts of the National Marine Fisheries Service (NMFS) to reduce the impact of fishing practices on large whales in our waters. The Board of Directors and members of the Cape Cod Commercial Fishermen's Association (CCCHFA) all recognize the importance of healthy whale populations and marine ecosystems, and we look forward to working with NMFS to achieve this through improved management.

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However, when reviewing the content of the Atlantic Large Whale Take Reduction Plan's Scoping Document as well as the information provided at the recent scoping meetings on this plan, we are troubled by the lack of adequate and timely stock-status information needed to inform these proposals. In fact, it does not appear that the most recent data regarding the status of right, humpback and minke whale populations is being employed or is even being identified as a crucial data need. Furthermore, there has been no obvious effort to quantify the impact of several recent management actions in key commercial fisheries which, while not targeted at reducing whale interactions, have almost certainly resulted in fewer vertical lines in the water (lobster trap reductions and increased CPUE in the groundfish fishery through sector management).

Therefore, instead of a data-rich process that is outcome-oriented with an eye towards supporting robust whale stocks, we have a process that is guided by what are termed 'overarching principles', namely the reduction on groundlines and vertical lines. These are tactics, not principles; and they are not an adequate basis for a management framework.

We and other industry groups are very concerned by the ongoing development of conservation measures intended to reduce the risk of serious injury and mortality of large whales due to entanglements *without current and comprehensive information regarding the known impacts of this fishing gear on each whale population*. With several of these whale stocks experiencing notable rebounds in terms of populations and health, occasional interactions with fishing gear are unfortunately inevitable. Therefore, our shared objective must be to minimize the mortality associated with these events and to ensure that these interactions are not undermining the overall upward population trajectory. As currently proceeding, this effort lacks appropriate and data-driven targets and risks unnecessary negative impacts to commercial fishing operations.

Protecting a resource, a tradition, and a way of life.

Because of these existing shortcomings, we strongly support the 'status quo' management alternative until such time as these decisions can be informed by more complete information regarding the stock status of each of these species and the relative impacts of these fishing gears on overall mortality and rebuilding trajectories.

Again, I appreciate the opportunity to provide comment and hope you will not act until we can do so with the benefit of this much-needed information.

Thank you for your attention to this matter.

Sincerely,

John Pappalardo
CEO, CCCHFA