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## Maine DMR comments on proposed ALWTRT alternative measures

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To: Kate Swails &lt;kate.swails@noaa.gov&gt;

Hi Kate.

I am writing to submit the Maine Department of Marine Resources (DMR) comments on the alternative management measures proposed to the ALWTRT regarding the reduction of the risk of entanglement to large whales due to vertical lines.

DMR supports the use of "Maine DMR #2" for the regulation of the Maine lobster industry in place of the Maine portion of the "NMFS Northeast Proposal". This proposal reduces the vertical lines calculated annually for Lobster Area Management 1 by over 30% and reduces the co-occurrence score by over 36% annually. That decrease in the co-occurrence score is the largest reduction of any alternative management measure proposed, including the NMFS Northeast Proposal, with the exception of a closure in the Cape Cod Bay right whale critical habitat. Additionally, when right whales are considered alone, Maine DMR #2 achieves a reduction in the co-occurrence score of almost 52% in the fall, when both whales and gear are abundant in the Gulf of Maine. This continues the trend of achieving larger decreases in the co-occurrence score than the management strategy initially proposed by NMFS. DMR #2 achieves higher reductions in co-occurrence scores by targeting measures in more strategic locations, increasing the trawl minimum further from shore and targeting areas with high seasonal overlap between whales and gear. This type of approach makes the most sense for both the protection of whales, and the continuation of an economically important industry.

Several of the proposed alternative management measures include closures in different large whale habitats throughout the northeast at different times of the year. DMR is not opposed to the Kraus *et al.* proposal to close the Jordan Basin region in the winter months, but encourages NMFS to utilize the 25 600 loran line for simplification and for ease of enforcement. Additionally, with regards to the Young *et al.* proposed closure on Jeffrey's Ledge, DMR re-states the necessity for NMFS to assume that all gear displaced by this closure will be relocated rather than removed.

I appreciate the opportunity to comment and, as always, please don't hesitate to contact me with any questions or concerns.

Terry Stockwell

Director of External Affairs