



Kate Swails <kate.swails@noaa.gov>

RE: Comments on the Co-occurrence Model

Patrice McCarron <patrice@mainelobstermen.org>

Fri, Apr 27, 2012 at 11:51 AM

To: Scott Kraus <skraus@neaq.org>, Kate Swails <kate.swails@noaa.gov>

Cc: "hauke@whoi.edu" <hauke@whoi.edu>, Brooke Wikgren <BWikgren@neaq.org>, "Brehme, Christopher" <cbrehme@keene.edu>

Hi Kate

In addition to the letter forwarded to you by Scott Kraus, I wanted to offer additional input from the MLA. I've liaised with the MLA Board to the extent possible to solicit additional feedback on the proposals.

The MLA continues to support the proposal, called DMR #2 in the most recent analysis. Feedback from the MLA board indicates that this approach should be feasible for lobstermen to implement, though only a small fraction of the industry is really aware of the proposal at this point in time. Key considerations include that the "6 mile" line was drawn in a relatively straight configuration off the coast in a location to capture a change in the bathymetry and therefore lobstermen's ability to "trawl up" and fish gear safely and efficiently. Additionally, this proposal does not propose trawls of >15 traps in areas 12+ miles from shore. There is a category of vessels in Maine which fish in offshore waters that have raised safety and operational concerns with regards to fishing trawls of >15 traps. They consider 15 traps the absolute limit of what can be safely fished (they prefer to stay at 10's). These vessels are limited because some are shorter in length and/or width and do not have the space to adequately handle that number of traps and rope, and others use older equipment which cannot handle the strain of hauling longer trawls.

However, preliminary model output from the alternative WHOI model (discussed in the letter forwarded by Scott Kraus) indicates that the risk can be significantly reduced by focusing vertical line reductions in areas solely beyond 12 miles from shore, and it identifies minimal risk reduction resulting from changes made from 3 to 12 miles. Though much additional outreach is needed to understand issues which may be raised regarding safety and operational feasibility, the MLA would like NMFS to analyze two additional "trawl up" scenarios:

Scenario 1:

Maine zones in waters outside 12 miles, minimum 15 trap trawls

Seasonal Measures, minimum of 20 trap trawls in waters outside of 12 miles:

Zones D, F, G in Dec and Jan

Zone C in Nov, Dec and Jan

Zone A in Aug and Sept

Scenario 2:

Maine zones in waters outside 12 miles, minimum 20 trap trawls

Seasonal Measures, minimum of 25 trap trawls in waters outside of 12 miles:

Zones D, F, G in Dec and Jan

Zone C in Nov, Dec and Jan

Zone A in Aug and Sept

With regard to the seasonal measures, we would like to further target those measures to the smallest spatial unit necessary to achieve meaningful reductions. We would also like to include a conservation equivalency for the category of vessels (limited by length, width or equipment) whose safety could be compromised by aggressive trawl up requirements by limiting the number of vertical lines that they can fish in a high risk area while allowing them the flexibility to trawl up in a manner that is safe for each vessel.

The MLA does not support closures in waters off the Maine coast. The MLA would like to see model output based on the "Maine" management area, rather than as part of the Northeast or Atlantic Coast. It is important that Maine lobstermen clearly understand the conservation benefit which will result in the waters where they fish as a result of their conservation efforts. The MLA would like to see model output based on the "Maine" management area separately for rights versus humpback whales. The MLA urges NMFS to remain open to continuing to refine management ideas, or consider alternative scenarios as it is very likely that lobstermen will continue to identify concerns with existing proposals or simply come up with better ideas. As the safety, operational and economic consequences of these proposals become better understood, the industry must have the flexibility to alter existing proposals or generate new proposals.

Thank you for your consideration.

Patrice

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From: Scott Kraus [mailto:skraus@neaq.org]

Sent: Thursday, April 26, 2012 3:43 PM

To: Kate Swails

Cc: hauke@whoi.edu; Patrice McCarron; Brooke Wikgren; Brehme, Christopher

Subject: RE: Comments on the Co-occurrence Model

Hi Kate,

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