

April 27, 2012

The MA DMF & NMFS proposals to reduce vertical line risk meet the reduction requirements of the ALWTRP. Area closures, as proposed on the backside of Cape Cod and in the GSC, are unnecessary and will provide no additional risk reduction.

The MA DMF proposal is preferable because it not only addresses the effects of fishery FMP'S on risk reductions, but also considers the risk imposed on fishermen fishing alone in state waters. Closure of the CCB Critical Habitat from February 1 through April 30th will give a great reduction from vertical lines risk, according to the updated baseline. The MA DMF proposal assumes that the NMFS proposal will be in effect elsewhere in the Northeast waters. Consequently, the MA DMF proposal offers the greatest risk reduction while addressing concerns of industry.

The GSC and CCB-GSC proposals offer no greater risk reduction. Both proposals fail to identify reductions in those areas of vertical lines due to the various Fishery Management Plans. The results of these Fishery Management Plans reductions do show up on the updated baseline results which show a decline in endlines in those areas in 2009/2010. Also, according to IEC analysis, both proposals offer little more risk reduction than that proposed by NMFS on MA DMF. The fishermen in those areas have already, through great expense, made their gear compliant with ALWTRP requirements. If these two proposals offer no significantly greater risk reduction than the MA DMF or NMFS proposal, they should not be considered.

To consider area blocks in the co-occurrence model that have the "0" value for the purpose of risk reduction is pointless. The ALWTRT should concentrate on the area blocks with the higher co-occurrence scores in order to get the maximum benefit from risk reduction.

Best,

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