

To: Kate Swails, NMFS NERO

From: April Valliere
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Date: April 26, 2012

Subject: Comments on ALWTRT Proposals

RIDEM Division of Marine Fisheries offers the following comments on the Northeast Subgroup proposals after the 4/11/2012 conference call.

RIDEM Proposal

For clarification, there was a question on the proposal on the reductions in Vertical lines by area. They are based upon the adoption of the ASMFS Addendum 18 which is expected to move forward thru the ASMFC lobster board next week at the Commission. Area 2 reductions will implement a 25% in the first year, with subsequent reductions over the following 5 years to achieve a 50% trap reduction

Area 3 was included to reflect the ASMFC Addendum on trap reductions, our proposal focuses on the impacts of the nearshore waters only.

The exemptions requested are for Area 2 nearshore and state waters to reflect the fishing practices commonly utilized and the safety factors which must be considered.

Additionally, based upon the co-occurrence scores, there is no high risk visible by the proposal presented.

It should be noted that in the past 2 years, the time of potential highest risk to right/humpback interactions (Dec-April), the amount of gear has been substantially reduced due to the low abundances of lobsters in the SNE area. A large number of the fleet in Areas 2 & 3 have chosen to tie up vessels during the winter months, rather than fish. This can be substantiated thru RI's Port and Sea Sampling database.

The RI proposal ranked higher than the NMFS reductions and merits consideration for the exemptions requested.

State Proposals

We do not have any comments on the other states proposals, each state is unique in their fisheries and consideration should be given based upon the reductions in impacts.

Other Proposals

We question why the proposed closure areas of Jefferys to Cashes Ledge and Jordan Basin state their analysis examines impacts **with and without** relocation of affected gear but both the Cape Cod Bay to Great South Channel and the Cape Cod Bay closure areas state the analysis by the NMFS gear team assumes that the closure area **does not** prompt re-location of gear to other waters. The Great South Channel Closure states the analysis assumes that the closure prompts relocation of gear to surrounding waters.

We would assume that the any area closure in the offshore waters with large vessels for a period of time will likely have a gear relocation affect. The amount of gear affected is not likely to come back to the dock for a 4 month closure.

