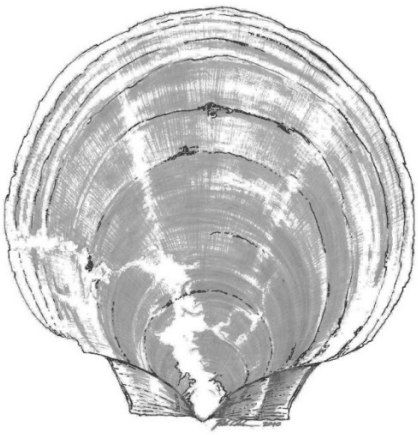
Atlantic Sea Scallop Fishery Management Plan

WRITTEN COMMENTS RECEIVED DURING THE SCOPING PERIOD

for

Limited Access Leasing



Prepared by the

New England Fishery Management Council

August 29, 2022

RECEIVED
JUL 05 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

June 17th 2022

Thomas A Nies, Executive Director

New England Fisheries Management Council

50 Water Street, Mill #2

Newburyport, MA. 01950

Re: Scallop Fishery Limited Access Leasing

Is leasing needed? Why or why not?

I am in favor of a leasing program in the LA scallop fishery as it would promote flexibility of operation within the fleet. When Amendment-4 passed back in 1994 it established the limited access scallop fishery; it also built in certain protections to help rebuild the resource. That action implemented crew size restrictions of no more than nine men, gear modifications to allow for escapement of smaller scallops and limited fishing time to two hundred and four day's at sea. It also put in a 5% cap on ownership to protect the heritage of the scallop fishery. Now almost 30 years later to maintain a sustainable rebuilt resource, vessels only spend 50 to 60 days at sea - down from 200 plus days at sea, crew has further been reduced to seven men, more gear restrictions have been implemented and rotational area management was adopted. I believe that it is time to look at the one boat one permit restriction. Designing a leasing program that would add flexibility while still maintaining the 5% ownership/control cap would increase the economic efficiencies of the fleet while having no added or negative impact to the resource.

The current management plan of one permit per boat leaves vessels tied to the dock for close to 300 days a year, if a leasing option were available it could save a tremendous amount of resources such as dock space, wasted fuel being burned while the boats sit idle for months at a time, and it would also limit the potential of environmental issues on unattended vessels.

If leasing/transferring of permits were to be allowed there would be no added effort on the resource as each permit would maintain it's original identity; meaning that at the beginning of each fishing year every permit in its particular category is allocated equal fishing opportunity. While maintaining the five percent ownership/ control cap, an additional cap of no more than two permit allocations to any one boat would protect the heritage of the fleet.

I would encourage the council to initiate an amendment to fully explore a fair and equitable program that allows for flexibility within the fleet.

: HOW COULD A LEASING PROGRAM EFFECT THE SCALLOP RESOURCE?

The scallop resource is surveyed on a yearly basis to determine the health and overall biomass of the resource, after which each Limited Access permit is equally allocated an amount of DAS and access area trips, as such leasing of allocation would have no impact on the resource.

: HOW COULD LEASING AFFECT PERMIT HOLDERS

. It would allow the permit holder the flexibility to transfer effort.

. The one boat one permit rule leaves boats tied to the dock for months at a time

Incurring unnecessary cost and taking up valuable dock space.

: HOW COULD LEASING AFFECT SHORESIDE BUSINESSES

. Shoreside businesses would operate more efficiently and cost effectively if workers didn't have to cross over 3 or4 idle boats to service their customers.

. If effort were transferred onto a vessel that vessel would work more often thus require more service more often.

. Shoreside businesses also have the option to work on other than scallop boats, while a scallop boat sits idle once it fishes it annual allocation.

. Scallop landings shoreside is relative to the fishing effort allocated to each individual permit which is based on the health of the resource on a yearly basis, not on the number of vessels in the port. Same goes for processors, service company's and supply houses.

: HOW COULD LEASING AFFECT CAPTAINS AND CREW

. Most captains and crew work on two or more vessels today, as they have been for many years now. Those captains and crew would not have to transfer from boat to boat they could simply stay on one boat. Under a volunteer leasing option, a one boat operator can simply choose to continue operating as they do today.

Thank you,



Peter Anthony

Nordic Fisheries inc.

New Bedford, MA.

Todd L. Bragdon
Oneonta Fisheries, Inc.
Resolve Fishing, Inc.
187 Cranberry Bog Rd.
Danielson, CT 06239

July 1, 2022

Thomas A. Nies
Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies:

I am writing you in opposition to the leasing of permits between scallop vessels. I have attended most of the scoping meetings and do not believe a leasing program is needed in the Limited Access catagory.

We have a program in place that has worked for the past 28 or so years and I do not see a need to change to improve some
corporate owner's bottom line. We hear the words "flexibility" and "safety" used as reasons for moving forward with a leasing program. While I am all for safety and improving overall safety of the operation of the vessel for the crew, a leasing program will fall short. Flexibility has been brought up several times at the scoping meetings as a reason for for a leasing program; flexibility in that some boats have not been able to use their full quota due to unforeseen circumstances. The scoping document does not state how often this may have occured and the question was never raised at
any of the meetings. Is this a solution looking for a problem?

If the problem is breakdowns or unforeseen circumstances, perhaps a review board would be a more appropriate way to address these issues. I was the only person at the scoping meetings, which I attended, to bring up this simpler solution to these "flexibility" issues.

As far as safety is concerned and maintaining a safe boat, if owners are unable to do this now, how will owners be able to do so under a leasing program? Under leasing, boats will be operating more and have less availabilty for maintenance.

As to who would be affected negatively by a leasing program: small shoreside businesses such as welders, mechanics, painters, suppliers as well as captains and crews who will pay financially for the opportunity to earn their living.
The fishing vessel crews who do some of the hardest and most dangerous work, will have to pay as in the LIMITED ACCESS general catagory for quota and permits under a leasing program. There were some owners at the scoping meetings
who said they would not charge the crews for permits they already own, but there are others who would charge the crews.
How long before that would become the industry standard? With a leasing program, some boats with combination permits such
as mine, may be forced into other fisheries. This will increase the efforts in other fisheries such as groundfish or squid.

If a leasing program were developed, I don't believe the council will go far enough. Days at sea should be eliminated and Annual Projected Landings (APL) should be divided equitably among the permit holders. The Council should be looking at the scallop fishery as a whole. This is where the council will fall short in a leasing program - they will be ensuring that larger corporations can improve their bottom line while making it difficult for smaller fleets to grow and expand. Leasing as proposed will make it even more difficult for any up and coming captain to become an owner/operator.

Although I oppose a leasing program, the council is asking for what I would prefer in a program if it moves forward with leasing. I find this disingenuous.

Thank you for the opportunity to comment.

Sincerely -

Todd L. Bragdon
Owner/Operator
F/V Resilient
F/V Resolve

toddresilient@gmail.com
401-864-1765

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Leasing in the Limited Access Atlantic Sea Scallop Fishery

Dear Mr. Nies:

I object to the leasing plan being discussed and urge the Council to vote against it. In many fisheries, like the groundfish, after the leasing programs are allowed Councils reduce the allocation for all permit holders within a fishery regardless if they lease or not.

If and when the Council decides to reduce DAS and/or closed area trips in the future many owners who can't lease will be forced out of the fishery. While it may not be the intention of the Council to reduce DAS, the scallop fishery is ever evolving and the Council cannot say with certainty trips won't be cut in the future. When the limited access program was established in the scallop fishery we had 204 fishing days and now we have only 24 days at sea and three access area trips even though the scallop resource has recovered and is not being overfished.

Any reduction in DAS or closed area trips will have a disproportionate effect on the owners who can't lease. For instance, if the current allocation is 24 DAS and three access area trips at 15,000 lbs. each and the Council decides to reduce the allocation 20% then the owners who don't/can't lease will be allocated 19 DAS and three access area trips totaling 36,000 lbs. whereas an owner with the ability to lease will be allocated 38 DAS and 6 access area trips totaling 72,000 lbs. Even though all permit owners suffered a 20% decrease, the owners who don't or can't lease will risk economic hardships every time the overall allocation is reduced.

No matter how you look at it, the leasing issue is an economic issue and the Council is being asked to make a decision that will decide who stays in the scallop fishery and who are forced to leave the fishery. Currently, the scallop fishery is one of America's greatest fishing successes and is envied throughout the world and I would ask the Council to preserve the resource and the fishing communities by rejecting the leasing proposal.

Sincerely,

John Cardarelli
F/V Jenna Lee – Permit ID # 310909

Edgar Seafood Products Inc.

15 Greene St 5th Floor
New York, NY 10013

June 22, 2022

Tom Nies, Executive Director
New England Fisheries Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Scallop Scoping Comments on Leasing Program

Council Members,

Edgar Seafood Products Inc is the owner of 4 limited access scallop vessels. We are scallop only vessels and do not engage in other fisheries currently.

We are in favor of a leasing program that allows for flexibility in fleet operations.

We see the need for similar flexibility in leasing that the LAGC fleet has. We have growing concerns with the sustainability of the fishery and see low allocations continuing for some time until the biomass is rebuilt.

Rising costs in fuel, electric, parts, maintenance, and shipyards are just a few factors that make it increasingly necessary to create the ability to remove some vessels from the fleet. These rising costs are not temporary and will not go down. Fuel costs are at an all time high which adversely affects the crews. With rising costs to the vessel owner in keeping the vessel safely and environmentally operable, we could see vessel owners needing to take more percentage and crew wages reducing as a result. Although we do not want this to take place as we need the best crews to produce for our vessels with the finite allocation we have, we may be forced into this without the ability to operate economically.

We have 2 crews for the 4 permits we fish, so we see no change to crew with a leasing program.

With a mechanism that will allow for quotas to be leased between permits, without hindering resource rebuilding plans, it is incumbent upon the council to create the flexibility within scallop plan to have this community survive.

As examples of leasing mechanisms that are already in place, look at the LAGC portion of the scallop TAC, Access Area Trip Trade program as well as the RSA program. These are all examples of temporary transfers of allocation from one permit to another. Temporary transfers only, should be in the program. Permanent transfers should not be allowed unless it is part of a usually transacted purchase and sale agreement.

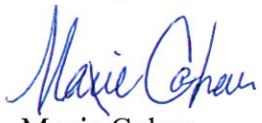
In whatever design we see in the management plan for leasing, an integral part should be not allowing permits to lease off their quota and to enter other fisheries. If a permit leases its quota

off in portion or in whole, then the remainder of the permit should be made dormant (unusable) for the remainder of the fishing year. This will ensure that a program will have a neutral effect on other fisheries. However, without the ability to increase the scallop usage of a vessel by a scallop leasing program, then we will have no choice but to enter the fisheries that we are currently permitted to fish to augment revenues for the year. For our vessel this includes primarily, longfin squid, summer flounder and black sea bass.

We do not see any ill effect on shoreside business from leasing. The same amount of DAS will be utilized, so basic consumables will stay the same. We also do not anticipate negative impacts to shoreside contractors, as there are not enough now to service our vessels due to the national labor shortage.

We support a leasing program for the limited access scallop fleet.

Best regards,



Maxie Cohen

Valerie Edwards
Oneonta Fisheries, Inc.
Resolve Fishing, Inc.
187 Cranberry Bog Rd.
Danielson, CT 06239

July 2, 2022

Thomas A. Nies
Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies:

I am writing you in opposition to the leasing of permits between scallop vessels. I have attended most of the scoping meetings and do not believe a leasing program is needed in the Limited Access catagory.

We have a program in place that has worked for the past 28 or so years and I do not see a need to change to improve some
corporate owner's bottom line. We hear the words "flexibility" and "safety" used as reasons for moving forward with a leasing program. While I am all for safety and improving overall safety of the operation of the vessel for the crew, a leasing program will fall short. Flexibility has been brought up several times at the scoping meetings as a reason for for a leasing program; flexibility in that some boats have not been able to use their full quota due to unforeseen circumstances. The scoping document does not state how often this may have occured and the question was never raised at
any of the meetings. Is this a solution looking for a problem? If the problem is breakdowns or unforeseen circumstances, perhaps a review board would be a more appropriate way to address these issues.

As far as safety is concerned and maintaining a safe boat, if owners are unable to do this now, how will owners be able to do so under a leasing program? Under leasing, boats will be operating more and have less availabilty for maintenance.

As to who would be affected negatively by a leasing program: small shoreside businesses such as welders, mechanics, painters, suppliers as well as captains and crews who will pay financially for the opportunity to earn their living.
The fishing vessel crews who do some of the hardest and most dangerous work, will have to pay as in the LIMITED ACCESS general catagory for quota and permits under a leasing program. There were some owners at the scoping meetings
who said they would not charge the crews for permits they already own, but there are others who would charge the crews.
How long before that would become the industry standard? With a leasing program, some boats with combination permits such
as mine, may be forced into other fisheries. This will increase the efforts in other fisheries such as groundfish or squid.

If a leasing program were developed, I don't believe the council will go far enough. Days at sea should be eliminated and

Annual Projected Landings (APL) should be divided equitably among the permit holders. The Council should be looking at the scallop fishery as a whole. This is where the council will fall short in a leasing program - they will be ensuring that larger corporations can improve their bottom line while making it difficult for smaller fleets to grow and expand. Leasing as proposed will make it even more difficult for any up and coming captain to become an owner/operator.

Although I oppose a leasing program, the council is asking for what I would prefer in a program if it moves forward with leasing. I find this disingenuous.

Thank you for the opportunity to comment.

Sincerely -

Valerie Edwards
Owner/President
F/V Resilient
F/V Resolve

oneonta187@gmail.com
401-374-4651

June 28, 2022

Thomas A. Nies, Executive Director
New England Fishery Management Council,
50 Water Street, Mill #2
Newburyport, MA 01950

Dear Director Nies,

RE: "Atlantic Sea Scallop Limited Access Leasing Scoping Comments"

I write to offer my comments on the scoping of Leasing. I am an owner of several Full-Time Limited Access Scallopers in New Bedford, MA. I am in favor of leasing. We need more and better operational flexibility. Leasing will be a good option to offer opportunities to transfer either DAS or AA trips onto another vessel.

It is important to remember that the highest priority is to continue to protect the scallop resource at all times. Need to have restrictions in how the transfers of DAS and AA be allowed. I offer these comments on what the leasing program should consider.

The following should be in the leasing plan:

1. The leasing program should not be mandatory and it should be **voluntary**.

2. The leasing program should **stay within the LA Fleet**, not to include the LA GC Fleet, not the NGOM scallopers, or include any other fishery.

3. **Vessel Allocation Restriction**: No scallop vessel should have more than twice as many Access Area (AA) trips or days at sea (DAS). If it's 3 AA trips this year then no vessel can have more than 6 AA trips. The same goes with DAS, if there's 24 DAS then capped at 48 DAS. To protect the resource there should be no mixing of carryover DAS from different permits, each permit should maintain its unique identity. All of the DAS fishing for each trip must come from one permit. Meaning that no boat should combine 5 DAS from one permit and 3 DAS from second permit to make an 8-day trip. The carryover of DAS will protect the resource and keep the monitoring easier.

4. **Vessel Size Leasing Restriction:** Leasing should only be allowed between vessels of same size or leases from equal or larger vessel. There should be no leasing from smaller vessel onto larger vessel.

5. **Ownership Restriction:** Maintain the 5% ownership cap which it really should translate into that no owner shall have more than 5% of the LA allocation. Since it's 5% of allocation; no owner can have more than 5% of DAS or 5% of the AA trips.

6. There should be consideration to **restrict potential redirecting into other fisheries**. This is an old issue. During the A15 over ten years ago, it was easier to jump into other fisheries. Now it is more restrictive but regardless both New England and Middle Atlantic councils along with GARFO need to do a better job. There are other tools in the toolbox.

Secondly, I want to comment about jobs whether it's on vessel or shoreside.

Crew Jobs: As for jobs to make it clear that we have had a job problem in our fishery for a long time, and a leasing initiative will not currently affect the number of jobs in the LA scallop. In terms of jobs among fishermen, they already shrank a long time ago. When scallop management shifted away from meat counts, the crew size per trip went from 13 down to 9 – that's 4 jobs per boat. Then shortly afterwards, it went down to 7 – cutting the original number almost in half. It has been stuck at 7 crewmembers since then. Now over the years the management plan reduced the time each vessel is at sea averaging 70 days away and spend more time at the docks than at the sea fishing. This has encouraged many captains and their steady crews to operate two or more boats. The consolidation of captains and crew have already occurred.

Shoreside Jobs: In terms of jobs among shoreside businesses, when it comes to the servicing of the engines and deck machinery, the number of shoreside jobs is proportional to exploitable biomass. With the management changes over the years, our fishery has shrunk to averaging 70-75 days. The hours on engines and winches on each vessel have reduced over time, and that's extending the life on main engines and winches. Even the hauling out boats at the shipyards have changed over time. The haul-out intervals have stretched from occurring every 12-18 months to now 30-36 months. If we have leasing, the overall hours will shift over to the vessel which will increase or double on the engines if you do allow leasing. And the main and cargo winches will require more servicing because of more usage, too. The same will happen with haul outs. The shipyard haul outs frequency will go back to 12-18 months, because the boats will be spending more at sea so there will be additional work on the boats.

It's fishing opportunities or strength of the scallop exploitable biomass resource that will determine the number of people who crew the fishing boats. The same goes for the servicing of fishing boats on the shoreside. More fishing allowed, more jobs. Less fishing, less jobs. I believe it's the size of the exploitable biomass not leasing that has greater impact on the jobs. Take a look at the Groundfish Industry, where the number of people working shrunk not because of the creation of sectors it was mainly due to the shrinking Groundfish biomass. Especially on the choke species such as Yellowtail. You can't go fishing unless you have enough choke species to go fishing. That's where the groundfish job losses came from.

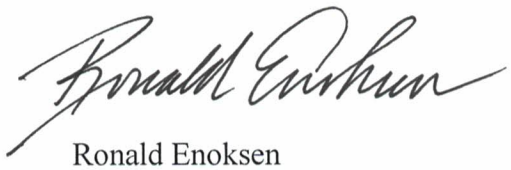
All of the jobs whether it's fishing or shoreside have shrunk or expanded is due to the current exploitable biomass levels, which it is very dynamic and it changes.

I encourage the Council to vote in favor to start the leasing program. I have faith in the Council process that using NMFS, PDT, AP, and Committee will develop a good leasing program incorporating restrictions to continue to protect the resource. Leasing can encourage the vessels

that do lease are to be newer having efficient engines at the same time provide better working environment for the captain and crew.

I am fully committed to support sustaining our offshore scallop fishery for the long term and generating good, safe jobs for crewmembers. Thank you for considering my comments.

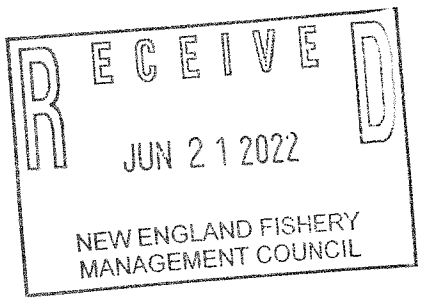
Respectfully,



Ronald Enoksen

NORDIC FISHERIES, INC.
14 Hervey Tichon Ave.
New Bedford, MA. 02740

June 16, 2022



Thomas A. Nies, Executive Director,

New England Fishery Management Council,

50 Water Street, Mill 2

Newburyport, MA 01950

Dear Mr. Nies,

I am writing this letter in support of leasing. My name is Roy Enoksen and I have spent my whole life in the scallop industry. From Scallop captain and deckhand for 20 years and then processor of scallops and fish. I attended the scoping meetings in New Bedford listened while many people spoke in opposition to leasing and that is their right, but many comments showed that they have probably not read the information and they had the facts wrong. The 5 percent cap is still in effect and we support that. This leasing proposal does not allow anyone to own more than 5 percent of the scallop fishery. This program does allow multi vessel owners to put 2 permits on one boat and if it is a large HP boat and it has a smaller permit added there will be an adjustment made the lesser permit will not be upgrading to match the larger permit.

Is leasing needed in the Limited Access Scallop Fishery "YES" because it creates fixability and would improve the overall quality of the boats in the fleet. Less boats fishing all the same time makes the fishing safer. The boats would be more fuel efficient and safer.

What are the benefits and drawbacks to leasing? The benefits are flexibility for everyone even if you don't lease right away but you have a boat that has a serious problem you can lease your lost opportunity to another boat while you make repairs or upgrades to your boat. Leasing would defiantly modernize the fleet over time. If the leasing program is structured properly, it will not give anyone more ability to fish more. I can not see any drawbacks and this is not mandatory this is an option and all we want to do is put two permits on one boat. The 5 percent limit on permits is good we are in favor of it. We are not asking for any more than 2 permits on one boat. There are approximately 70 percent of the permits that would like to have the option of leasing. In most organizations' majority rules, we have a majority it should not matter who owns the permits that is not he American way. This industry is I think the most over capitalized fisher in the country.

We would support 100 percent observers and or cameras on board the boats. More flexibility when things change in the resource. Leasing should not affect the captains or crews. If you work on 2 boats now you go to one, the best of the two. One boat does the work of two so very little change if any.

Remember it is voluntary and will take time. Most of the concerns some people have can be addressed in the amendment process. Since 70 percent of the permits are in favor of leasing, we should at least have the opportunity to develop of fair and equitable program.

Sincerely Yours,



Roy Enoksen

Thomas A Nies, Executive Director
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

It has been 10 years since stacking was discussed in Amendment 15 and ultimately turned down. In this decade, we have watched our the Limited Access fleet flourish without any sort of management changes that would require a need for consolidation measures. With that I can say that the new leasing program proposed is not needed. The proponents of leasing say this program will bring flexibility to the fishery, but it will not be beneficial for all stakholders in the long term. Leasing, much like stacking, will cause consolidation within the industry at the detriment of independent and small fleet owners. Consolidation allows the large fleet owners to exert more control over those in the industry including the owners, crews, and shoreside support businesses.

This type of program is not good for the majority of the industry and most stakeholders are not in favor of this style of management. Please urge the council to vote no on implementing a leasing program and keep our industry

Sincerely,

Aaron Feener

F/V Beth Anne – Permit #410463
F/V Fearless – Permit #410293

Empire Fisheries, LLC
926 Stonington Rd
Stonington, CT 06378
Phone (860) 495-0415

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950
February 25, 2022

Re: Atlantic Sea Scallop Management Plan – Limited Access Leasing

Dear Director Nies and the New England Fishery Management Council,

Empire Fisheries is a commercial fishing business out of the port of Stonington, CT. Our fleet of scallop boats represents the largest commercial fishing operation in the state. While we are based out of Stonington, CT our boats travel and fish in federal waters along the New England coast and mid-Atlantic.

We are not in favor of considering a leasing program! We believe the council has higher priorities that would better serve the scallop fleet as a whole. I do not believe it can be designed to create advantages that can be exercised by all or be conservation neutral.

While I believe some flexibility may benefit the fishery through providing temporary relief for a bona fide, verified hardship, preventing abuse would be difficult.

The few good ideas and outcomes that I have heard would come from this kind of thing can be achieved already through other business means. Leasing is a business plan, not a resource management tool. Most reasoning I've encountered would lead to consolidation and would create "tenant" fishermen situations.

I have concerns about the program being a foot in the door to modification that would have negative consequence to the resource and create embedded advantages and disadvantages for different groups of fishermen.

Sincerely,

Joseph J. Gilbert
Owner/Operator
Empire Fisheries

From: Joe Gilbert [mailto:hiddenemp@aol.com]
Sent: Friday, January 21, 2022 10:21 AM
To: melanie.griffin@state.ma.us; Eric Reid <ericreidri@gmail.com>; Tom Nies <tnies@nefmc.org>
Cc: Travis Ford <travis.ford@noaa.gov>
Subject: Fwd: Atlantic Sea Scallop Fishery

Dear Ms Griffin, Mr. Reid, and Mr. Nies,

I am forwarding a letter I sent to Michael Pentony on Monday regarding the scallop fishery. He suggested that I share it with you as well. Please see my original email below and let me know how we can continue this conversation.

Best Regards,

Joe Gilbert

On Mon, Jan 17, 2022 at 12:02 PM Joe Gilbert <hiddenemp@aol.com> wrote:

Mr. Michael Pentony
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

January 4, 2022

Dear Director Pentony,

I am writing to you as a member of the limited access scallop fleet. My entire career has been in fisheries and aquaculture. Like most in my position, I must be familiar with science, fisheries management, oceanography, environmental study, electronics, supply chains, administration, diesel mechanics, hard work, and finally fisheries.

The Atlantic Sea Scallop fishery is one of the best managed fisheries in the world. The path to today's position is well documented and relied on many factors. In the 1990s, the fishery was in collapse and the government was buying back capacity. Then a dedicated group from industry stepped forward to work with the regulators, researchers, and legislators to save the fishery. The group from industry was comprised of folks with broad backgrounds, vast experience, expertise in the scallop fishery, financial desperation, and most importantly, a willingness and desire to preserve the fishery and the way of life.

The challenges they faced were formidable. These folks, in partnership and collaboration with researchers and regulators, followed the science and over the years have helped design the fishery as we recognize it today.

A constant in the world is change. Things are changing in the ocean and the scallop industry must evolve.

Today's challenges are many. Climate change, ocean development, and the unknown effects that are certain to come are all of great concern to our industry. Taking the wait-and-see passive approach will only make us reactionary as we face challenges. I encourage industry and regulators to take an active approach and to think, manage, and innovate toward growing our resource, increasing yields, reducing uncertainty, and creating resiliency and stability in the resource, the fishery, and the downstream markets.

I believe we are perfectly positioned and there has never been a better time to begin the discussion of evolving scallop fishery resource management. Technology has advanced and there are new ways of observing and assessing the resource, habitats, and ocean chemistry.

Ideas have been brought to proof of concept and now need regulatory support to be scaled to effective implementation. Many more ideas are dismissed too easily at the review level. These ideas are ready to be explored by industry partnering with researchers. Unfortunately, the ideas that industry believes will offer insights into our future are too often not chosen for approval.

Within industry there are many owners, operators, and shoreside support that have broad backgrounds, vast experience, and expertise who regularly collaborate with universities and foundations on fisheries science. These industry members have demonstrated dedication to supporting scientific efforts to maintain and grow a healthy scallop fishery in a changing environment. Many have offered financial support and use of vessels and crew at their own expense for worthy research projects. The resulting outcomes and data have been instrumental in guiding and informing regulation and future science.

The following are topics relevant to evolving the fishery:

- Changes to FMP to facilitate more active management
- How to make FMP changes in a timely manner
- Redefine/define our 5, 10, and 20 year goals for the resource and the fishery
- Supporting initiatives in the area of resource enhancement, including but not limited to seed transplanting, spat survival, and predator controls
- Support applied science directed at expanding the resource and creating resiliency within the fishery

I have looked at examples of resource management from other countries and while none of those examples are a perfect fit, there are many noteworthy practices. I believe the US sea scallop fishery can be stabilized and grown if we dedicate ourselves to innovative research & development. A change in how we perceive our fishery and its management is the first step.

Please advise me as to the best way to begin these discussions.

Best Regards,

Joseph J. Gilbert

Empire Fisheries
926 Stonington Road
Stonington, CT 06378

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I own a full time vessel in the limited access fleet of the Atlantic Sea Scallop fishery. I also founded a multigenerational shoreside support service that still works on vessels in this fleet. A large portion of our company's income comes from fishing vessels in the Southern MA & RI regions, especially from the scallop fleet. In my opinion, a leasing program is not needed in the LA fishery. Our fishery instead needs to focus on promoting better fishing practices and better science to increase our biomass. Leasing is a contentious issue that will take up the majority of the Council's time. This time is better spent focusing on issues that will help the entire fleet, especially in these uncertain times. We need to be focusing on why we have low recruitment, what has caused the low biomass, and how to prevent further loss of fishing grounds to windmills. Concentrating on increasing the scallop resource benefits the shoreside support infrastructure along with the fishermen.

Please urge the council to vote no on developing a leasing program. The scallop fishery is what has made the Port of New Bedford the most prosperous port for the past twenty years – there is no reason to change the management of the fishery.

Sincerely,

SR.

Robert Haines

F/V Tropico – Permit ID # 410210



Wholesale Fish and Scallop Dealers
Cold Spring Harbor
Cape May, New Jersey 08204
609-884-3405

June 25, 2033

Mr. Tom Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, Ma 01950

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JUL 07 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

Dear Mr. Nies,

My name is Keith Laudeman. I own and operate a sea scallop business in Cape May, New Jersey. We have been in business just over 100 years. I support The NEFMC Developing and Leasing Program in the L.A. scallop fishery. Leasing Will provide vessel owners the ability to eliminate older vessels and replace with newer ones.

The following is a list of our vessels and permits:

Alexandra L, Full Time, 2 Dredge
Kim & Jr, Full Time, 2 Dredge
Pursuit, Full Time, 2 Dredge
Sea Quest, Full Time, 2 Dredge
Susan Leigh, Full Time, 2 Dredge
Vaud J, Full Time, 2 Dredge
Victoray, Part Time, 1 Dredge
Wesley L, Part Time, 1 Dredge

Sincerely,

K.N. Laudeman

Keith N. Laudeman

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Shawn Machie and I am currently the captain and partial owner of the Capt John in the LAGC fleet of the Atlantic Sea Scallop fishery and have 25 years of previous experience running full time scallop vessels in the LA fleet. I am writing to you today to voice my opposition to the implementation of a permit leasing program. I am concerned that this leasing program is going to have the same effects as stacking, which is not good for the industry as a whole. It could lead to the loss of jobs and decreased crew lay as outlined in the Amendment 15 process when stacking was examined.

All fishermen in the Atlantic Sea Scallop fishery rely upon a healthy resource and this change in the LA fleet could have lasting impacts on the LAGC fleet too. Leasing could lead to an increased mortality rate even if the 10/10/20 rule was followed. Increased mortality means a lower biomass to fish in future years, which would impact our fleet allocation negatively. There are many other ways to allow for flexibility in the LA fleet that will not lead to the fishery's detriment. I ask the council to not focus on leasing for flexibility and explore other options with all stakeholders in mind.

Please urge the council to vote no on developing a leasing program.

Sincerely, Shawn Machie

Mr. Nies,

My wife Rebecca and I own the F/V William Lee out of New Bedford, Ma. I have been in the scallop industry for close to 20 yrs and have been a commercial fisherman for 30 years. As both a part-time limited access owner and general category owner, we are looking for the ability and flexibility to run our business efficiently and effectively as possible, while making the bottom line a priority. Many fisheries on the east coast already successfully participate in quota leasing and have for years, for example groundfish, general category sea scallop, sea bass, surf clam, and area 3 lobster permits. There are many scallop owners who currently lease their ground fish quota every year and have for years. We are just asking for a voluntary program, that renews every year, allowing us the flexibility to make decisions on our fishing year and what would be the most profitable to pursue. Thank you for your consideration in this crucial matter and given the uncertainty of the post-pandemic business world, we ask that you address this issue and move forward with a voluntary pilot program as soon as possible.

Thank you,

Chad and Rebecca Maguire
FV William Lee
FV Noah Andrew
FV Grace Ann Marie

Sea Harvest Inc.

985 OCEAN DRIVE
CAPE MAY, NEW JERSEY 08204
TEL. (609) 884-3000
www.atlanticcapes.com

June 30, 2022

Tom Nies, Executive Director
New England Fisheries Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Scoping Comments on Leasing Program

Dear Council Members,

Fishing Vessel Enterprises is the owner of 16 limited access scallop vessels. We have a variety of classes in vessels with smaller part-time and full-time single dredge as well as double dredge vessels. Many of our fleet also have fishing permits other than scallops.

We are in favor of a leasing program or other method that allows for flexibility in fleet operations. We are not in favor of stacking permits.

The choice of program that comes to the top as the easiest method for flexibility is leasing as it is already being utilized in the management plan for the Limited Access LAGC fleet. We share the overall scallop quota but have different management regimes.

Leasing would aid in addressing the ever-increasing inflationary concerns for operators that need to maintain vessels that may be dormant for over 80% of the year. Insurance premiums are increasing at alarming rates. Shipyard and monthly maintenance along with supply chain issues are becoming unpredictable. Fuel costs are causing electricity costs to skyrocket for vessels laid up for more than 300 days a year. We need the flexibility to be able to adjust to changing unpredictable economic times during times of reduced biomass conditions.

We have issues that are being looked at to rebuild the stock, but that is not going to happen in the short term. The expenses to owners and the crews are unpredictably increasing. The crews need to maintain the crew compensation at the highest possible level to maintain the highest possible yield from the fishery and business. Without some type of flexibility in the fishery to eliminate unneeded expenses, the owners will be forced to retain more compensation to keep the vessel and business viable.

Many of the opponents of this type of program are crews that are concerned about losing revenue or lose their sites on vessels due to leasing. Most crews now operate 2-3 vessels each. The crew components will not change in compensation ***IF*** the owner can reduce expense and create financial efficiency to keep the best settlement possible to provide the best production for their vessels. It is in the best interest of any owner to maintain a good settlement to get good productive crews. We do not see any effects on the crews in leasing, but without it we do.

Leasing will address growing safety concerns. Vessels are aging out of their intended lifespan. Decreasing allocations and increasing expenses are preventing owners from allocating the needed funds to keep these old vessels in good repair, thereby preventing sinking or accidents. If the quota decreases or the ex-vessel prices do not follow the usual positive economics of supply and demand, the issue will get worse. In these uncertain inflationary times, we cannot predict pricing will always offset lower quotas.

Leasing should not result in any negative impacts to the resource. The same method of harvest and operational effort will be confined within the same rules of engagement we have now. We need to be careful that we do not create efficiencies in harvest by leasing. For access areas, there is output controls (area pound limits) so there will not be efficiency created by leasing access areas. Whether it is a large, small, single, or double, if the allocation for that area is limited by pounds, then the efficiency will not change. The same mortality rate applies. Open area DAS will need to be addressed differently.

Leasing for open area will need to be designed differently so as not to create negative impacts on the resource. Harvest volumes per vessel per day are largely dependent on size of vessel, horsepower or if they are single dredge or double dredge. The simple method would be to use the vessel baselines that are already in place and documented at NMFS. These are the same baselines that are used when an owner wants to replace a vessel. Provided the ***Lessee*** does not have baseline that is greater than what would be allowed in a standard vessel replacement, then the lease could be granted. Staying within vessel class for open area, utilizing what is already documented and approved, will have no effect on the resource. This would eliminate the need for power/length adjustments. Double dredge and single dredge (full-time and part-time) vessels would need to trade DAS within their dredge class.

We want to create flexibility that maintains the current permit value and continues to support the type of investment that it took to enter the fishery. This would mean that leasing would have to take place from LA permit holder to LA permit holder. It may be beneficial to lease only within common ownership. This would allow flexibility within companies. Currently the proposal is no more that 2 permits per vessel per year. With internal leasing only, there may be no negative impacts to allowing an owner to lease more than 2 permits per vessel per year or combination thereof.

Any leasing needs to limit harvest effort through ownership or leasing to no greater than the 5% ownership cap that exists today.

All transfers should be temporary only. Any permanent transfer should be no different than a standard sale from one owner to another as it exists today.

Leasing should be designed so that it does not allow increased capacity in any in any other fishery. Any vessel that leases scallop allocation away to another vessel shall have its federal permits "arrested" or without the ability to be utilized for the remainder of the fishing year starting at the time of transaction. Scallop allocation should be allowed to be leased out of CPH so that a permit does not need a vessel to be attached. This allows for older vessels to be taken out of the fishery and lease quota as well as maintain a mechanism to bring the permit back to active vessel harvesting. It seems likely that leasing could relive pressure on other fisheries as the vessels with the flexibility to lease on more scallop quota would be less likely to participate in lesser valued fisheries.

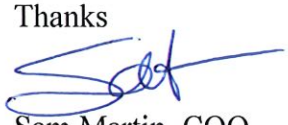
Shoreside business related to consumable services such as fuel, oil, rings, bags, dredges, wire, and the like, will have minor effects as the fishery will be prosecuted in the same fashion as is currently taking place. The same approximate amount of time will be spent on the water fishing in the same fashion, just with less individual vessels.

Other shoreside business will have minor effects if any from leasing. Preventative vessel maintenance and other major work at shipyards or wharf side, could increase with an owner's ability to reinvest into their remaining vessels with increased economic efficiency.

There are environmental benefits to leasing. Older vessels tend to be less fuel efficient, hence leasing could decrease carbon emission as likely older vessels will be exited first from the active fleet. Also, there will be many less vessels burning fuel or using shore power to be laid up for 300+ days a year, thereby further decreasing carbon emissions. Other benefits would be seen from reinvestment in vessel environmental compliance provisions from economic efficiencies gained through leasing.

We appreciate for your time and effort in supporting leasing in the LA Scallop fishery.

Thanks



Sam Martin, COO
Sea Harvest Inc

-----Original Message-----
From: Tom McNulty <tommcnultysr@hotmail.com>
Sent: Tuesday, June 28, 2022 5:17 PM
To: comments <comments@nefmc.org>
Subject: Leasing

To whom it my concern,
I I'm the owner of 4 scallop vessels, been in the business for 20 years. I'm in favor of permit leasing for the reason that it would with using the vessel more than 4 months out of the year. 2 of my boats are new vessels, but leasing still makes sense even with that.There are other reasons that makes it favorable but I'm sure you heard most of them. I'm asking for counsel to consider it. Thank You Tom Mcnulty T&S fisheries

Sent from my iPhone

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am the owner of the F/V Temptress, I have been in business for 28 years. I have seen highs and lows of the industry. I can tell you today that consolidation, leasing, or stacking permits will not benefit the hard working people of the industry. Fishermen and dockside work alike, will suffer, and struggle to deal with these changes. Also the small family business like I operate with my son will struggle to survive.

Please urge the counsel to vote NO on developing a leasing program. It will not benefit the industry.

Timothy Mello
Owner F/V Temptress
DOC#679608

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Jostein Mjolhus and I am the owner of F/V Sandra Jane in the limited access fleet of the Atlantic Sea Scallop fishery. I am writing to you today to voice my opposition to the implementation of a permit leasing program as it is another attempt at consolidation and is rooted in financial gain.

When we examined leasing and stacking in Amendment 15, the Council found that any consolidation measures would be detrimental to the fishery. The findings of the Council's studies painted a grim future for almost all stakeholders ranging from fishermen and owners to shoreside support. The only entities that would benefit from consolidation measures would be the large, vertically integrated corporations. With consolidation measures put in place, these corporations would be able to take control of the fishery and apply pressure to any independent owners like myself. Many independent owners will be forced out of the fishery that has allowed them to provide for their families. We will see the generational fishing families disappear and scalloping will be pushed towards a corporate fishing model.

In deciding whether to prioritize scoping for an amendment, the concept of flexibility was stressed repeatedly by the proponents of leasing. Flexibility is not what we currently need though. We need to begin thinking about how to foster our resource so we can continue to fish the Atlantic Sea Scallop. Time should be spent on conducting better science to understand why we are able to harvest millions of pounds less than expected in these closed areas. We should also be looking at ways to increase our biomass as we are seeing declining recruitment.

Please urge the council to vote no on implementing a leasing program. Time would be better spent promoting the health of our resource.

Sincerely,

Jostein Mjolhus

Jostein Mjolhus
F/V Sandra Jane – Permit ID #410430

From: jack morris <jackm.fleet@gmail.com>
Sent: Friday, June 24, 2022 8:24 AM
To: comments <comments@nefmc.org>
Cc: John private <john@jplgi.com>
Subject: Fwd:

I am Captain Jack Morris. My scallop fishing career started as a deck hand in 1975 out of Pt Pleasant NJ. I eventually moved to New Bedford with my wife and son. There, I worked my way up to engineer, mate and became Captain of a new 100' boat.I have seen all of the many changes in the scallop fishery first hand over the years. I am now a director of operations for 5 full time scallop vessels.

Sadly, some things have not changed and remain stuck in the late 1970's. As technology has changed the industry, the thinking in some aspects has not. 70% of the vessels in our scallop fishery were built in the mid 70's to the early 1980's. The majority remain fishing today and are between 40 to 50 years old.

There has been resistance to get the vessels of this age out of the fishery for no good reason. These old vessels keep chugging along with their old hulls which need constant repairs.

There is so much mis-information circulating about need for change, the benefits of reducing the fleet size and unfounded concerns about negative impact on the fishery itself. The pool of insurance companies which insure our vessels has dropped from many to about 5 total. The remaining company's rates have risen to unaffordable rates because of the age of the vessels. Almost all have stopped insuring old boats as a high risk.

There is a way to reduce the number of old boats operating. Owners of more than one vessel could have the flexabilty to take an old boat out of the fishery and put the permit on a newer vessel. This would not change the number of scallop permits in the fishery. The shoreside services would remain at the same level and this flexability would be completely voluntary. The crew size would remain the same. Owners who wish to continue the old way can operate as they have done.

I could continue so much more about the responsible ways to help our fishery thru flexibility. The environmental effects would take vessels with no fuel efficiency out and greatly decrease the carbon footprint which is a priority with the Biden administration.

respectfully,

Captain Jack Morris

O'Hara Corporation NE
120 Tillson Avenue, Ste. 100, Rockland, ME 04841 ph: 207-594-4444 • fax: 207-594-0407
oharacorporation.com Thomas A. Nies, Executive Director

New England Fishery Management Council
50 Water Street Mill#2
Newburyport, MA 01950

June 30, 2022

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Director Nies:

I write today on behalf of the O'Hara Corporation to support the Council initiating an amendment in 2023 to consider a leasing program for the limited access (LA) scallop fishery. The O'Hara Corporation is a 4th generation family held company active in commercial fishing in New England since 1907. The company owns 11 LA scallop vessels homeported out of New Bedford, Massachusetts.

Is a leasing program needed?

A leasing program is needed in the fishery to address the significant overcapacity that has existed in the fishery for decades. Recent ranges for total days fished (DAS & AA) for our vessels has ranged from 50-70 days. These vessels do not participate in other fisheries and therefor remain tied to the dock for most of the year. Allowing vessels to fish 2 permit allocations annually addresses this concern.

The Council should develop a voluntary, fair and equitable program that creates no harm to other participants in the scallop fishery or other fisheries in the region, maintains the current ownership cap of 5% and does not increase harvesting pressure on the resource. We believe leasing should be limited to a maximum of 2 full allocations per vessel annually to minimize crew disruptions.

Who/What would be affected…...

- A leasing program will not affect the resource as permit allocations will be calculated under the current annual system of surveys, estimates of exploitable biomass, pounds allocated for Access Areas and the most recent catch per unit of effort (CPUE) in determining DAS. A program would not allow increases in harvest beyond the current targets.

- A voluntary leasing program could provide all permit holders the opportunity to add 1 additional annual vessel allocation to their harvest plan for the year. The program provides a benefit of choice for all owners.
- We do not see negative affects to shoreside businesses in New Bedford. There are a tremendous number of vessels in New Bedford and shipyard services are limited. It is not uncommon for us to need to bring a vessel to Rockland Maine for these services. Dockside services are extremely inefficient, as rafting vessels is needed to accommodate numbers of boats – often 4 deep. When a vendor arrives they must bring all of their tools and parts across numerous vessel to complete a job – a trip their likely to take many times throughout the day. If a leasing program were available these businesses and our company would benefit if harbor congestion is reduced. Lastly, we do not see reductions in vessel maintenance needed with fewer vessels as the primary driver of work needed is hours fished – hours on the engine determine the schedule.
- Over many generations, the O'Hara family has highly valued our crew – we would not be in business without them. The lay system we utilize across all vessels we own in every fishery we participate in shares the cost of operations with the value of the catch with our crew. We anticipate savings in operations under a leasing program that would provide benefit to the company and our crew. Currently the crew we engage work 2 vessels per year and we do not expect any job loss under a leasing option.
- Maintaining a fleet of underutilized vessels creates unnecessary environmental impacts. When vessels remain idle and rafted it is not possible to provide shore power to all not against the dock. This requires running generators which increase fossil fuel emissions.

If a leasing program were developed…...

- A leasing program will provide conservation benefits. A quick google search provides a definition of conservation as "prevention of wasteful use of a resource." Wasteful use of resources is clearly embedded in the current system.
- There were many questions in the Scoping Document under this heading Answers to some are found in text above but many would benefit from more data and discussion in the development phase.

Climate change and increasing other ocean uses (offshore wind), will create significant challenges for the fishery. Steps are needed to create measures that allow us to be flexible and adapt under changing conditions. A leasing program can be a strong step forward in addressing these concerns.

Thank you for the opportunity to comment,

Casey O'Hara

Casey O'Hara

Executive Vice President

LUND'S FISHERIES

Wild caught product of USA

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

July 5, 2022

Mr. Thomas A. Nies, Executive Director, NEFMC
50 Water Street, Mill 2, Newburyport, MA 01950 - By Email: comments@nefmc.org
Re: Atlantic Sea Scallop Limited Access (LA) Leasing Scoping Comments

Mr. Nies:

Thank you for the opportunity to provide our comments concerning the limited access allocation leasing proposal. I am writing on behalf of our family-owned and operated, vertically-integrated, commercial fishing company, employing more than 200 on our company-owned vessels and in our freezing/processing plant and cold storage operation, based in Cape May, New Jersey. We are opposed to the Council moving ahead with an amendment to implement the proposal, just as we opposed NMFS implementing Scallop Amendment 15. We see no benefit to our company from the proposal.

Our primary reason for opposing the Council developing a leasing amendment next year remains the same as expressed in our August 23, 2010 letter to (then) regional administrator Pat Kurkul:

> *Due to our significant concerns about the potential for A15 to shift fishing effort from the scallop fishery into other fisheries in the New England and Mid-Atlantic regions, we are opposed to allowing a limited access scallop vessel to lease fishing effort from another limited access scallop permit.*
>
> *Allowing the leasing of scallop effort from a vessel with other limited access permits will have the effect of shifting that vessel's effort into other limited access fisheries, most of which are already struggling under limited quotas and other restrictions. The management system will take years to react to this transfer of effort into other fisheries (if) A15 is to be implemented in 2011.*

Although the proponents of LA permit leasing and LA allocation leasing have maintained, then and now, that a leasing program should be 'conservation neutral', a roadmap for how the management system will get there has yet to be developed. We do not believe the Council or the Agency can guarantee leasing LA scallop allocations would not lead to effort transfers into other, fully-subscribed fisheries since no mechanism to avoid this outcome has been described. Apparently, the option to lease scallop allocations is perceived as a benefit by some in the LA fishery, but a benefit for some should not come at a cost for others. Our recommendation is that all other fishery permits held by a LA scallop vessel leasing its scallop allocation should be held in CPH throughout the duration of any lease agreement.

While proponents of leasing argue it is somehow unfair to them that their vessels are tied up for long periods of time after their scallop allocations have been harvested, this outcome is a business decision on their part and the result should not be creating major uncertainties in the scallop fishery, at sea and shoreside, as their proposal would do.

In our family's business, for example, over many years, we have accumulated full-time, part-time and LAGC scallop permits but also have purchased and utilized a variety of other federal and state permits, for species like, scup, fluke, black sea bass, Illex and Loligo squid, mackerel and herring (to name a few), so that each of our scallop vessels can support a full-time, year-round crew on our boats and in our plant.

Just has occurred in the Multispecies fishery following consolidation of the fleet after the creation of the sector program, we can predict that scallop allocation leasing will also lead to a loss of jobs in the scallop fishery in the region, with less opportunity for individual fishermen and with a significant reduction in the demand for shoreside services like the provision of ice, fuel and vessel and gear maintenance.

Just has occurred with consolidation in the ITQ clam fisheries, scallop allocation leasing will lead to individuals exiting the fishery; to retire boats and live off the leasing income. These individuals are then no longer working in the industry and we predict their loss will lead directly to the loss of opportunity for individual fishermen and shoreside support businesses and fishing communities in the region.

With the approval of a scallop leasing amendment by the Council, we expect economic power in the region would shift away from the independent owner/operator fleet and accrue to the larger fleet owners, with the result being crew shares diminishing, since the fishermen are likely to be asked to pay the cost of the leased scallops they have been hired to catch. Negative impacts on the auction can also be anticipated, with less product sent there, as vessels with leased quota could be incentivized to expand their economic ability to invest in freezing at sea. The barrier to entrance into the scallop fishery can also be expected to increase as $7-8 million scallop permits' value can be expected to soar after having another LA share of leased scallops attached to it.

We conclude by identifying our comments with three conclusions reached in Dr. Georgiana's May, 2022 discussion document, which helps to solidify our opposition to the Council moving ahead with a scallop LA leasing amendment:

- The LA scallop fishery has been successful and stable. Major changes in the structure of this successful and stable fishery may cause unintended effects;

- Northern Economics' potential benefits of leasing in the LA scallop fishery identifies cost savings of less than 3% of the fishery's annual value, and;

- It is not apparent how a 5% limit on fishing rights could be enforced when AA Trips or DAS can be leased between owners.

We challenge the Council to attempt to pierce the corporate ownership veil of the LA scallop fleet to satisfy this third bullet!

Thank you for your attention to and consideration of our concerns and recommendation.

With best regards,

Wayne Reichle

Wayne Reichle,
President

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APR 25 2022
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MANAGEMENT COUNCIL

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a co-owner of scallop vessels in the limited access fleet of the Atlantic Sea Scallop fishery. A general leasing program is not needed in the LA fishery and would cause harm to the independent/small fleet owners, fishermen and shoreside businesses. The concept of putting two or more allocations onto one vessel will lead to consolidation in the scallop fishery and give larger, vertically integrated companies more power.

In other fisheries that have been consolidated, we see that the fishermen typically feel the immediate impacts via changed settlements or lease fees. The next to feel the effects will be the independent/small fleet owners when they are squeezed out of the fishery. Once those stakeholders dwindle, the independent shoreside businesses will have no customers as the large companies have their own support in house. These effects will trickle down to the local economies that rely on the waterfront workers and cause damage to those communities as well.

Please urge the council to vote no on developing a leasing program. Our fishery is one of the most prosperous because of our current management structure.

Sincerely,

Antonio Santos

F/V Lady of Fatima – Permit ID # 410363
F/V Queen of Peace – Permit ID #410556
F/V Santa Isabel – Permit ID # 410493
F/V Santa Maria – Permit ID #410459

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a co-owner of a small fleet in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. We have seen through other fisheries what leasing programs can lead to, just look at the Ocean Quahog industry. This measure may seem like it benefits all in the fishery, but it ultimately leads to consolidation. Leasing would eventually put independent and small fleet owners like me out of business. The large, vertically integrated companies will be able to exert more control over the industry and those of us who do not have these same operating capabilities will not be able to compete.

I would ask that the Council instead focus on conducting research on what is happening in areas like NLS-W and NLS-D. In those areas, there has been a major discrepancy in how many pounds the scientists estimated there are and how many pounds we are actually able to harvest out of these areas. We need to focus on fostering our resource and promoting its health so everyone is able to fish for years to come.

Please urge the council to vote no on developing a leasing program. Our fishery has been successful because the "one boat, one allocation" management structure supports all owners, not just a select few.

Sincerely,

Jaime Santos

F/V Lady of Fatima – Permit ID # 410363
F/V Queen of Peace – Permit ID #410556
F/V Santa Isabel – Permit ID # 410493
F/V Santa Maria – Permit ID #410459

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Gabriel Skaar and I am the owner of F/V Thor in the limited access fleet of the Atlantic Sea Scallop fishery. Through 62 years of hard work as a fishermen, I moved my way up to ownership. I am writing to you today to voice my opposition to the implementation of a permit leasing program as it is another attempt at consolidation and is rooted in financial gain.

When we examined leasing and stacking in Amendment 15, the Council found that any consolidation measures would be detrimental to the fishery. The findings of the Council's studies painted a grim future for almost all stakeholders ranging from fishermen and owners to shoreside support. The only entities that would benefit from consolidation measures would be the large, vertically integrated corporations. With consolidation measures put in place, these corporations would be able to take control of the fishery and apply pressure to any independent owners like myself. Many independent owners will be forced out of the fishery that has allowed them to provide for their families. We will see the generational fishing families disappear and scalloping will be pushed towards a corporate fishing model.

In deciding whether to prioritize scoping for an amendment, the concept of flexibility was stressed repeatedly by the proponents of leasing. Flexibility is not what we currently need though. We need to begin thinking about how to foster our resource so we can continue to fish the Atlantic Sea Scallop. Time should be spent on conducting better science to understand why we are able to harvest millions of pounds less than expected in these closed areas. We should also be looking at ways to increase our biomass as we are seeing declining recruitment.

Please urge the council to vote no on implementing a leasing program. Time would be better spent promoting the health of our resource.

Sincerely, Gabriel Skaar

Gabriel Skaar

F/V Thor – Permit ID #410338

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RECEIVED
JUN 27 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a captain and co-owner of a full time vessel in the limited access fleet of the Atlantic Sea Scallop fishery. I have been fishing for 22 years, but my have been around this fishery for my whole life as a member of a multigeneration fishing family. A leasing program is not needed in the LA fishery. It would make is harder for the independent and small fleet owners to compete, as proven by the Council's research during the Amendment 15 process. It is also assumed that the fleet owners would take the permit from a less efficient vessel and put it on the more efficient vessels, which would also place a greater stress on the resource. Leasing would make it harder for independent vessel owners, like myself, to keep a crew. The crews will choose to fish on vessels with two permits on it rather than on a vessel with only one permit on it. Please urge the council to vote no on developing a leasing program.

Sincerely,

Jeffrey Skaar

MR. TOM NIES EXECUTIVE-DIRCTOR
N.E.F.M.C.
50 Water ST. Mill #2
Newburyport Ma.
01950

RECEIVED
JUN 15 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

Dear Mr Nies,

leasing makes so much sense that it gives Captains the option to make sure that they can fish all the trips every season, regardless of any unforeseen problems that occur, something they lack under one boat - one share system.

Scallop trips will have a back up plan, there will be fewer times when trips are lost or Captains are unavailable.

Older boats can be retired and permit put on a newer vessel.

By using fewer and newer boats cost for fuel will be less and more money available for crew.

I support developing a leasing program in L.A. scallop fishery because also of the environmental benefits.

Sincerely Eleanor Starrett

P.S. I am from a fishing family. My Dad, uncles, Brother, cousins etc. and husband!

Mr. Tom Nies, Executive Director
New England Fishery Management Council
50 Water Street Mill #2
Newburyport, Ma 01950

Raymond Starrish
P.O. Box 231
Fairhaven, Ma
02719

RECEIVED
JUN 15 2022
NEW ENGLAND FISHERY MANAGEMENT COUNCIL

Dear Mr Nies,

My wife and I have been in the scallop fishery since June 1978. It has been a long road. When we started we could fish 365 days a year. This year we received 3 access trip of 15,000 lbs. and 24 open days, a far cry from 365.

The scallop fishery is very open Capitalized. Leasing will help too bring the size of the fleet and F.A.C Closer in line. We have four boats with 2 crews who share 2 boats each. They move everything needed to fish from boat to boat. Why not stay and one boat with 2 permits on it. Nothing will change for Captain and the Crew.

What is being proposed is a VOLUNTARY and I stress VOLUNTARY leasing plan. When we started Scallop management, we received 220 days at sea, look where we are now!

Please look at the proposed leasing plan with open eyes.

Sincerly Raymond Starrish Sr.

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

July 3, 2022

Re: Atlantic Sea Scallop Limited Access Leasing Scoping Comments.

Dear Mr. Nies:
I am writing today to provide comments on Scoping for Limited Access (LA) leasing in the sea scallop fishery. I am the Government Affairs Manager for the O'Hara Corporation, Rockland Maine, a family held company that operates 11 LA vessels in the fishery.

Management Status
In 1994, the New England Fishery Management Council ("Council") recommended Amendment 4 to the scallop fishery management plan (FMP) to address the overfished condition of the resource and lack of controls to limit fishery mortality. Amendment 4 enacted a limited access program that qualified a limited number of participants and allocated a days- at-sea (DAS) system for the fishery. This action, and those that followed, have resulted in a well-managed resource supported by strong science and industry led cooperative research that has become one of the highest valued fisheries in the country.

However, 28 years following Amendment 4, the fishery also has what is likely the highest level of overcapacity of any fishery in the country. Even as the resource has remained at its highest assessed biomass during the last 15+ years, utilization of the fleet has been reduced to 50-75 total days at sea (DAS and Access Area trips). It is difficult to imagine any scenario in which the vessels in this fishery would ever reach even 50% of utilization.

It is an extremely inefficient and wasteful system. Some examples are: many vessels idle for 79% of the year (@75 days), dockage shortages in exist in ports, there are difficulties in accessing services when needed and an inability to access electric connections when rafted 4 deep - which results in fuel use dockside in winter months. Certainly, there is much room for improvement here- we can do better.

Leasing in the Scallop Fishery
I encourage the Council to initiate an action to expand the leasing program already found in the FMP to the scallop LA fleet in 2023. This could allow a program that is similar to leasing measures that currently exist for the general category fleet while providing the opportunity to address issues that are particular to LA operations. I support the principles highlighted by the Scallop Campaign to ensure a program causes no harm to the resource or participants in the scallop fishery, or other fisheries, and maintains the 5% ownership cap.

Climate Change
I recently was able to attend the East Coast Climate Change Scenario Planning workshop, June 21-23. For the fisheries participants, the 2 common themes were the need for adaptation and

flexibility within a rigid regulatory system. The scallop fishery is challenged by multiple stressors under existing climate change conditions: high exposure to rising ocean temperatures, harmful effects of ocean acidification and a slow but sure change in spatial distribution. Adding the layer of an overcapitalized fleet is a huge barrier to flexibility and attempts to adapt to current and future conditions.

Conservation Benefit

By moving forward to address the issues associated with this overcapitalize fishery, the Council has the opportunity to increase conservation and the net benefit to the Nation. The Magnuson-Steven Fisheries Conservation and Management Act (MSA) provides National Standards (NS) to guide the Councils in the development of FMPs. I draw your attention to NS 5 as it is applicable here and provide the following excerpt:

> **§ 600.330 National Standard 5 - Efficiency.**
>
> ***(a) Standard 5.*** Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.
>
> ***(b) Efficiency in the utilization of resources*** -
>
> (1) ***General.*** The term "utilization" encompasses harvesting, processing, marketing, and non-consumptive uses of the resource, since management decisions affect all sectors of the industry. In considering efficient utilization of fishery resources, this standard highlights one way that a fishery can contribute to the Nation's benefit with the least cost to society: Given a set of objectives for the fishery, an FMP should contain management measures that result in as efficient a fishery as is practicable or desirable.
>
> (2) ***Efficiency.*** In theory, an efficient fishery would harvest the OY with the minimum use of economic inputs such as labor, capital, interest, and fuel. ***Efficiency in terms of aggregate costs then becomes a conservation objective, where "conservation" constitutes wise use of all resources involved in the fishery, not just fish stock***

In summary, I encourage the Council to take the opportunity to create a fishery that is more resilient to climate change and competing ocean uses while minimizing the negative impacts of overcapitization. The Council can provide an open transparent process supported by analysis to develop a fair and equitable program for the fishery.

Thank you for the opportunity to comment,

Mary Beth Tooley

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Manuel Viera and I am the owner of F/V Guidance in the limited access fleet of the Atlantic Sea Scallop fishery. Through years of hard work as a fishermen, I moved my way up to ownership. I am writing to you today to voice my opposition to the implementation of a permit leasing program as it is another attempt at consolidation and is rooted in financial gain.

When we examined leasing and stacking in Amendment 15, the Council found that any consolidation measures would be detrimental to the fishery. The findings of the Council's studies painted a grim future for almost all stakeholders ranging from fishermen and owners to shoreside support. The only entities that would benefit from consolidation measures would be the large, vertically integrated corporations. With consolidation measures put in place, these corporations would be able to take control of the fishery and apply pressure to any independent owners like myself. Many independent owners will be forced out of the fishery that has allowed them to provide for their families. We will see the generational fishing families disappear and scalloping will be pushed towards a corporate fishing model.

In deciding whether to prioritize scoping for an amendment, the concept of flexibility was stressed repeatedly by the proponents of leasing. Flexibility is not what we currently need though. We need to begin thinking about how to foster our resource so we can continue to fish the Atlantic Sea Scallop. Time should be spent on conducting better science to understand why we are able to harvest millions of pounds less than expected in these closed areas. We should also be looking at ways to increase our biomass as we are seeing declining recruitment.

Please urge the council to vote no on implementing a leasing program. Time would be better spent promoting the health of our resource.

Sincerely, Manuel Viera

Manuel Viera

F/V Guidance – Permit # 410507

Thomas A Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comment

Dear Mr. Nies,

My name is Michael Walsh and I currently own a fleet of six vessels, two of which have part time scallop licenses in the LA fleet. I also am a fish buyer and have a shoreside support business that focuses on management and maintenance. I have been a fisherman my whole life. I am writing in to you today to express opposition of prioritizing an amendment for leasing in the Limited Access fishery. In our fisheries we see a clear pattern of cycles where our productivity reaches highs and lows. Currently in the scallop fishery, we are approaching a low in terms of recruitments and biomass. This coupled with the loss of fishing grounds to windfarms is going to prove to be a challenge for the scallop fishery. We need to be focusing on ways to promote our fishery rather than spending time developing an amendment that has proven to be a contentious issue before we have even begun discussing the details.

Please urge the Council to vote "no" on developing a leasing program and ask them to rather spend their time focusing on promoting a healthy fishery.

Sincerely,

Michael Walsh

F/V Atlantic Prince – Permit ID #310337
F/V Boomer Too – Permit ID #330851

-----Original Message-----
From: wlfisheries (null) <wlfisheries@aol.com>
Sent: Monday, June 13, 2022 1:02 PM
To: comments <comments@nefmc.org>
Subject: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr Nies,

My name is Bill Wasilewski and I own a full time limited access scallop vessel whose homeport is Barnegat Light, N.J.

I would like to record my opposition to leasing in FT LA category. I don't believe it will have any benefit to the fleet and the infrastructure that supports it.

I realise the council is tasked with many duties and I think developing a leasing program will be a complicated time consuming effort that will yield no benefit to the resource and diminish shoreside infrastructure.

I would argue we have somewhat of an unofficial leasing,consolidation program going on right now in the industry. One crew running 2 or 3 boats etc. If you look closely at what's going on now you will see it's negative for the scallop resource. I will explain.

The crews who run 2-3 boats are out many times in late fall and early winter when the scallop meat yield is at its worst. Say the vessel is out on a 15k closed area trip. That vessel will kill roughly 40% more animals as opposed to a vessel that made the trip when yields are optimal. This is not being a good steward of the resource.

The council should be addressing these issues in our industry and not wasting time on something that will be detrimental to the scallop resource. Please do the right thing.

I thank you in advance for your service and being able to comment, William Wasilewski President F/V William&Lauren Inc.

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

Dear Mr. Nies:

I would ask the New England Fishery Management Council to reject the leasing proposal in the scallop fishery. The proposal is economically advantageous for the large vertically integrated companies and large fleet owners at the expense of the individual and small fleet owners. The leasing proposal is a consolidation measure designed to increase market share for the larger fleets while forcing the individual and smaller fleet owners to compete on an unequal basis.

The leasing proposal does not promote conservation, in fact, the leasing proposal would increase fishing mortality by 1) increasing fishing capacity and, 2) encourage high-grading. Fishing capacity will be gained simply by putting a permit onto a new vessel, even if the two vessels are in the same length and horsepower classification. A new vessel will have unquantifiable measures that will increase capacity such as attracting the most productive captains and crew, have fewer breakdowns or mechanical issues, better designed platforms and workspaces and have more comfortable living arraignments. Fishing mortality would also increase due to incentivizing high-grading. Increasing days at sea and closed area trips onto one vessel allows the captain and crew the opportunity to spend the extra time searching for the larger scallops while lease fees, normally passed down to the crew, would encourage the crew to high-grade in order to regain lost revenue due to lease fees.

The leasing program creates an unequal playing field whereas the larger, well financed organizations are able to enjoy the economic benefits of the economy of scale the leasing program offers while the smaller fleet and individual boat owners are unable to participate in any economic savings. Over time, this inequality will force the family run scallop boats and businesses to sell out to the larger corporations and private equity firms. I ask the Council to reject the leasing proposal and support the traditional family fishing enterprises.

Sincerely,

Paul Weckesser

F/V Miss Shauna 321122, F/V Miss Leslie 310986, F/V Mirage 330896, F/V Prospector 410367, F/V Interceptor 251687

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I currently work for my father's scallop fleet and shoreside support businesses as well as for a independent scallop vessel owner and an owner of combination scallop/groundfish vessels. When I began working for my father, I started reading the Amendments and Frameworks to understand how we came to our current rules and regulations in the Atlantic Sea Scallop fishery. Amendment 15 stood out because it described how consolidation measures, whether they be called stacking or leasing, could affect our fishery. I found that the best summarization of the effects of consolidation measures is,

> *"The primary social impacts that have been documented in empirical cases involving consolidation explained in greater detail below range from employment loss, decreased income, decreased quality of life, changing relations of production, structural disadvantages to smaller vessels and firms, dependency and debt patronage, concentration of capital and market power, inequitable gains, regulatory stickiness, reduced stewardship, decreased community stability, loss of cultural values, and so on."*

In my time working on the New Bedford waterfront, I had noticed a large part of our community was not actively involved in the Council process. When the NEFMC decided to move forward with scoping for leasing within our fleet, I felt the need to make sure our stakeholders were aware this change may take place as it would affect thousands of families in the long run. As I went boat to boat and business to business to speak about leasing to fishermen and shoreside support employees, it became clear that the overwhelming majority of the stakeholders felt leasing would destroy the Atlantic Sea Scallop Fishery. Almost all of the voices I heard echoed the same concerns listed in Amendment 15, which solidified my belief that leasing would not be for the benefit of our fishery. We heard these voices at the New Bedford scoping meeting. Unfortunately some of the voices of opposition have been silenced by the threat of lost employment if they speak their opposition to leasing.

I can confidently say our fishery does not need and the supermajority of our stakeholders do not want leasing. While New Bedford has many different fisheries operating out of it its success as the most prosperous port comes from the Atlantic Sea Scallop fishery. Why would we move forward with implementing a measure that has been proven to destroy fisheries when the majority of our stakeholders do not want it? As we witnessed in the New Bedford scoping meetings, those in favor of leasing could not clearly define their reasoning for the <u>need</u> for leasing. They indicated they were in favor of leasing as it would provide them with the economic flexibility in violation of National Standard 5 of the Magnusson Stevens Act. The questionable research they provided to further their claims was quickly and easily discredited by respected, unbiased scientists. With these thoughts, I am asking you to please urge the Council to vote "no" on this proposal.

Sincerely,

Shauna Weckesser

Shauna Weckesser

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

As a resident of Fairhaven, I grew up working on the New Bedford waterfront with my father who is a marine electrician. I am now currently a mate in in the limited access fleet of the Atlantic Sea Scallop fishery. There is no need for leasing of permits in this fishery. There is a great need for better science and the opening of more areas to allow for better rotation of fishing grounds. We are continuously given trips in the same areas forcing us to overfish these areas until the biomass is depleted. The most recent example of this can be found in the MAAA, which now has so few scallops it no longer qualifies for a closed area.

The Environmental Defense Fund is globally know entity that lobbies for catch shares, consolidation, and leasing. Their goal is to minimize fisheries in the name of sustainability at the hands of fishermen and their livelihoods. These same measures have trickle down effects that will also affect shoreside businesses. The EDF's mission is not about "sustainability" or the "carbon footprint," but more about privatizing a public resource and redistributing the resource to a select few wealthy corporations. Please look to Canada or Iceland to see that this measure is not for the benefit of the majority of stakeholders in this fishery, but rather for the corporation. Leasing will wreak havoc on the local economies and destroy our community's history.

Please urge the council to vote no on developing a leasing program and keep the fishing industry belonging to the fishermen.

Sincerely,

Devin Amarante

Devin Amarante

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been in the Limited Access fleet of the Atlantic Sea Scallop fishery for 36 years. I am currently a captain in the fishery and have seen the fishery develop from its beginning management plan. The Council, through its management, has assisted in making this fishery one of the most successful and prosperous in the world. They have consistently done their job of improving the fishery and allowing for plenty of flexibility in the industry. That being said – there is no need for leasing in this fishery. The LA fleet is so successful because of its current management, why change now?

The LA fleet have watched other fisheries downfall once they have implemented leasing. One of the most affected groups in those management changes have been the fishermen. Their lays were changed or they were charged lease fees. Many good fishermen were forced out of their fisheries because they simply could not make a living. The LA fleet of the scallop fishery is currently alive and well, please do not change the management to something that would benefit a select few.

Please urge the council to vote no on developing a leasing program. Leasing will not benefit the majority of stakeholders, it will instead destroy our fishery.

Sincerely,

Peter Barcz



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. The first scenario is that the fishermen will have to pay lease fees and it will create a financial burden that affects our livelihoods. The second scenario is that the owner absorbs the cost of the lease, but this will also be at the fishermen's detriment. If an independent owner absorbs the lease cost, they will now be that much more disadvantaged in the market. They will have an extra cost that will lead to having less funds to maintain a seaworthy vessel. Depending on what the fishing year looks like, these things combined could put small owners out of business and lead to a large loss in jobs. With these thoughts in mind, please urge the council to vote no on developing a leasing program.

Sincerely,

Rui Branco



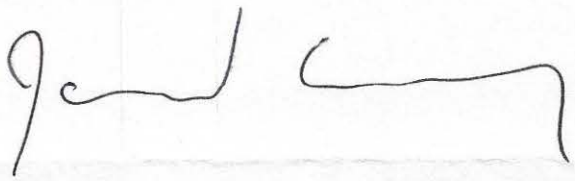
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To whom this may concern,

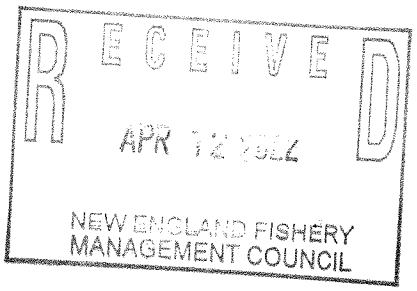
Please allow this statement to serve as an open letter against the movement to combine scallop fisheries vessels/owners licenses and the "stacking of permits" throughout the entirety of the scallop industry. My name is Jarrod Carney and I have been blessed to be a longstanding member of the New Bedford scallop fleet and it's working communities importance for 30+years. While this is not a request that all industry members will be able to participate in, please allow me to speak on behalf of the many in agreement to strongly protest the notion and actions to build larger and grossly efficient scalloping vessels that will undoubtedly and inevitably cause an unsustainable overfishing and processing of a precious and endangered public food resource. Stacking permits will only lead to imminent over-harvest and destruction to the biomass further tipping the scale to permanent industry wide damage and to the demise of it's working community all in the name of corporate greed. Please stand with me on the dire importance of this matter. Thank you for your efforts in understanding what is at stake for our food source, industry, and livelihoods.

Sincerely,

Captain Jarrod M. Carney



Capt Alan H Cass
888 Smith Neck Rd
Dartmouth, Massachusetts 02748



March 7, 2022

Tom Nies
Executive Director
New England Fishery Management Council
50 Water St., Mill #2
Newburyport, Massachusetts 01950

Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Sir:

I am writing in opposition to the Leasing of permit allocations between vessels.

The proposal in itself can lead to many negative issues affecting the industry and the communities that now provide support for vessels, crews and families of fishermen.

* Consolidation and a monopolizing of the industry

* Competition of service businesses will be lost as the Large corporations can and will take over supply.

* Independent fish buyers would have to deal with the big corporations for supply, instead of going through the auctions for supply of fish products.

If leasing is permitted, every business that works with, supplies to, gets product from, services crew with fuel, food, and gear, will feel the effects of this proposal.

Every community that gains an economic boost from the scallop industry, and the families of fishermen that will be displaced will feel the loss.

Look at the once thriving East Coast Groundfish fleet. Leasing has allowed a handful of vessels, to lease, the allocations of a hundred or so other fishing vessels.

Look at Gloucester, MA and Portland, ME and other fishing ports once their fleets shrank, the services moved because there wasn't enough work to support the shoreside businesses and keep them profitable.

What will be the direct and long term adverse effects on the people that go fishing on these vessels for their lively hood, the shore side businesses that support the scallop industry, and the fishing communities that surround this robust industry.

The Scallop Campaign has highlighted several key points in their discussion of the need for this proposal.

1. Operational Flexibility has improved with the economy of the scallop industry and with the management measures to made to insure a healthy resource. The high return on investment is evident even with limited allocations, which are decided by the condition of the resource monitored by the best science available and managed by the New England Management Council.

2. It is the Economic Stability that provides sustainability and operational flexibility, for owners, crew members, and support industries, not the other way around.

3. Operational efficiencies of fuel conservation and economic benefit are no different with the use of 4 boats for 4 allocations than it would be using 1 boat year round for all the allocations. The vessel owner may see more economic benefit as he would have to manage less boats, but the crewmembers would not.
For example; Instead of having 2 crews for 4 vessels, there would be one crew on the one vessel. There is no guarantee that the crew would benefit at all, in fact with more economic power concentrated among fewer participants, the possibility exists of changing the system of the lay or share system and how the crews are paid.

4. Since new construction is taking place now anyway for the replacement of older vessels, the crews are taking safety courses from shore side support services, and mandated safety drills are taking place, makes this point, effectively mute.

5. New Vessels are still being constructed and engine efficiency is decided by regulation on the carbon footprint, not by the owner. The power efficiency of the vessels ability to fish is already regulated, as the vessel being replaced cannot exceed 10% of the existing engine size and power.

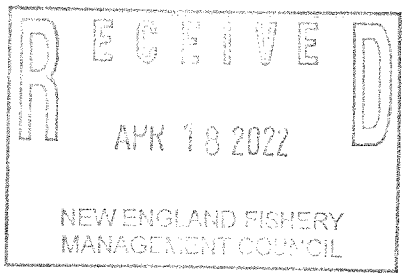
The Bottom Line!
If the proposal passes as an amendment:
Consolidation of form will take place and only create larger corporations within the scallop industry that will have more control of the resource from ocean to table and economically injure the smaller entities in the industry.
If it does not become an amendment:
The owners, crew, business entities, and the communities that support the Sea Scallop Industry will continue to thrive with the continued resiliency of the Sea Scallop Resource.

Sincerely,



Capt Alan H. Cass
ahc51@aol.com
508 991 0571

Alex Cass
39 Ohio St.
New Bedford, MA 02745
March 21,2022



Tom Nies
Executive Director
New England Fishery Management Council
50 Water St., Mill #2
Newburyport, Massachusetts 01950

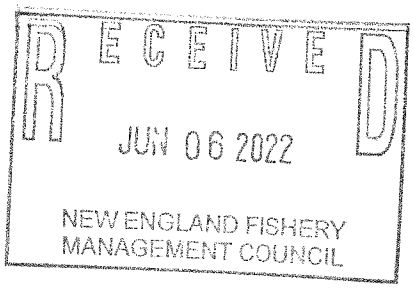
Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Sir,
I am writing in opposition to the Leasing Permit allocations between vessels.
The proposal itself can lead to many negative issues affecting the industry and the communities that now provide support for vessels, crews and families of fishermen.

If proposal passes as amendment:
Consolidation of form will take place and create larger corporations within scallop industry that will have more control of the resource from oceans to table and economically injure the smaller entities and businesses in the industries.
By not passing this amendment, the owners, crews, businesses and the community that support the scallop industries will continue to thrive with the continued resilience of the Sea Scallop Resource.

Sincerely,

Thomas A. Nies, Executive Director
New England Fishery Management Council,
50 Water Street, Mill 2
Newburyport, MA. 01950



Re: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Director Nies and the New England Fishery Management Council,

My name is Thomas Coley, I am a captain in the limited access full time scallop fleet, and also a member of the Scallop Advisory Panel. I am a hired Captain and do not own my own boat. I have earned a living working in the scallop fishery for over 40 years.

I am against a Limited Access Leasing Program. I don't believe there is a need for a leasing program in the LA scallop fishery. This fishery is not in a position where it needs leasing for the participants to survive. Everyone is viable, and earning a good living. The inefficiency in the scallop plan is part of what has made it so successful. All of the scallop permits are anchored to the boats which created the fishing history of that permit. As soon as you start removing the permits or trips from the boats and putting them up for rent, you will be opening the door to many things you did not see coming. Leasing and stacking of trips or permits are not conservation measures and do nothing to benefit the resource. To the contrary they will probably cause overfishing. There is nothing in the leasing of permits or trips that benefit the captains or crews that are working the boats. Leasing and permit stacking are nothing but a business plan designed to benefit some fishermen and or fleet owners over others to increase their bottom line.

When the social impacts of leasing and permit stacking have been studied and documented, they have included such things as " employment loss, decreased income, decreased quality of life, structural disadvantages to smaller vessels and firms, dependency and debt patronage, concentration of capital and market power, inequitable gains, and reduced stewardship" I believe that a leasing program would affect captains and crews with loss of income because the leasing fees are always passed onto the crews by the owners. I believe shoreside business will be negatively affected because there will be less vessels to service and repair.

Another approach that the Council could use to further address flexibility for permit holders, would be to create a program that could allow vessels with hardships that could not fish their allocation during the current year, carry their trips into the next year or fish them on similar same owner vessels.

If a leasing program is to be considered it has to be limited to a single permit leased in and ownership caps should apply. Open area DAS should only be allowed to be leased between vessels with similar baselines. No leasing between different LA permit types. Thank you for your attention to this letter.

Captain Thomas Coley,
Clinton, CT.
tpcoley@sbcglobal.net

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Miguel Cordeiro and I am currently a captain of two full time vessels in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. This is another consolidation measure that is being posed as something that will be good for the industry, but it will only be at the detriment of the small guys. Leasing in theory may look good on paper, but we can see it has not worked in every other fishery that has implemented it. Look at the draggers – the majority of their allocations are held by a select few and the owners are constantly leasing in more in order to survive.

In the scalloping industry, the majority of owners (62% according to the Council's scoping document) only own one or two vessels. These owners will not be able to compete with the large corporations that will have more bargaining power to lease allocation in. In eliminating the need for half of the vessels in the fleet, the large fleet owners will have less expenses/more capital to buy up more permits and allocation. Our management system of one boat, one permit works well for both the independent owners and large fleets and we should not change it.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Miguel Cordeiro

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a captain in the limited access fleet of the Atlantic Sea Scallop fishery and have been in this industry for 42 years. I do not believe a leasing program is needed in the LA fishery. If leasing is implemented, the large, vertically integrated corporations will buy up a lot of permits. They will drive the price of permits up, making it all but impossible for an independent guy to get into the industry. Our whole industry dynamic will change and the culture of the community fishing will erode.

Also, I have seen in the crew in the LAGC fleet pay for the price of the allocation and earning less money. Those who own the business running the vessel do not absorb the cost. Despite what some owners in the LA fleet say, we know that the crews will have the lease fees taken out of them.

If you go down to the waterfront and talk to the industry members – the fishermen, the gear stores, the shoreside support workers, you will find that the majority of stakeholders do not want this. Please urge the council to vote no on developing a leasing program. Our fishery is clearly successful with its current management, which leads me to the question of "if it ain't broke, don't fix it.

Sincerely,



Darryl Cutter

Thomas A Niés, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a fourth generation fishermen that hopes to pass this fishery and all of its opportunities to my children. Currently, I am the captain of my family's two vessels in the limited access fleet of the Atlantic Sea Scallop fishery. I am against a leasing program and do not believe it is needed in our industry. The consolidation this program will cause an overwhelming loss of jobs that will be detrimental to this industry. Further, the local economies that depend on this industry will be hard hit with these loss in jobs. We have watched other fisheries implement these measures and it has never worked. The only ones who benefit from consolidation measures are the large, vertically integrated companies. The crews, captains, small owners and independent shoreside workers will all suffer in the long run.

Enough is enough with the consolidation measures – they are not needed nor wanted. We need to focus on regulating the areas and promoting the health of our resource, not implementing measures that will hurt the hardworking people of the industry. Please urge the council to vote no on developing a leasing program.

Sincerely,

Alipio DaCunha

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a captain in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in this fishery for the past 18 years and I do not believe a leasing program is needed in the LA fishery. If a leasing program is implemented it will cause lots of harm to everyone, but mostly to the guys who are out at sea on these vessels. The most obvious negative effect is the change in our pays due to potential lease fees or changed settlements. What is more concerning is the potential unintended safety repercussions leasing could cause. The good owners are able to maintain their vessels during the vessel's downtime. If one vessel is allowed to fish two or more allocations, downtime for maintenance may be pushed to the backburner. This can have negative affects on the seaworthiness of the vessel and the safety of the fishermen.

Please urge the council to vote no on developing a leasing program and keep the fishermen safe at sea.

Sincerely,

Scott DeCosta

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a captain of an independently owned vessel in access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing, much like stacking, will only cause consolidation in the industry. A decade ago, the Council found that those affected most by a consolidation effort would be the captains and crews. Leasing will give larger companies more power and disrupt the system that has made us the most prosperous fishery for the past 20 years. It will put the independent and small fleet owners out of business. Jobs will be lost both on the crew end and on the shoreside end as the large, vertically integrated fleets will have no need for additional crew or outside support. Please urge the council to vote no on developing a leasing program.

Sincerely,

Lewis DeMello

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Derek Eilertsen

Derek Eilertsen

Captain of F/V Liberty and F/V Beiningen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a captain in the limited access fleet of the Atlantic Sea Scallop fishery. I am from a family of fishermen and own my own lobster boat. I do not believe a leasing program is needed in the LA fishery. Leasing is another form of consolidation that would eliminate the individual boat and small fleet owners. We have seen that leasing does not work in other fisheries and can lead to a loss in jobs and decreased quality of life for fishermen. Leasing in the scalloping fleet will change the nature of the fishery from community based to corporate fishing. The resource cannot currently withstand the higher mortality rate that would come from leasing. We should be focusing on ways to promote scallop growth and retention, not on a leasing program. Please urge the council to vote no on developing a leasing program.

Sincerely,



Tim Fields

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been in the limited access fleet of the Atlantic Sea Scallop fishery for more than 40 years. I am currently a captain of two vessels owned by a small fleet owner. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. There are other fisheries that have implemented leasing and the majority of these fisheries have fees associated with leasing. Either the fishermen will have to pay or the owners will have to pay this lease fee. I have been around long enough to see the effects of leasing on the groundfish fishery. Our fishery runs well as is and has made New Bedford the most prosperous port for the past 20 years. Do not allow this initiative to be taken up. Please urge the Council to vote no on the leasing proposal.

Sincerely,

Fernando Homen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Miguel Cordeiro and I am currently a captain of two full time vessels in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. This is another consolidation measure that is being posed as something that will be good for the industry, but it will only be at the detriment of the small guys. Leasing in theory may look good on paper, but we can see it has not worked in every other fishery that has implemented it. Look at the draggers – the majority of their allocations are held by a select few and the owners are constantly leasing in more in order to survive.

In the scalloping industry, the majority of owners (62% according to the Council's scoping document) only own one or two vessels. These owners will not be able to compete with the large corporations that will have more bargaining power to lease allocation in. In eliminating the need for half of the vessels in the fleet, the large fleet owners will have less expenses/more capital to buy up more permits and allocation. Our management system of one boat, one permit works well for both the independent owners and large fleets and we should not change it.

Please urge the council to vote no on developing a leasing program.

Sincerely,



Miguel Cordeiro

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a captain in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in this fishery for the past 18 years and I do not believe a leasing program is needed in the LA fishery. If a leasing program is implemented it will cause lots of harm to everyone, but mostly to the guys who are out at sea on these vessels. The most obvious negative effect is the change in our pays due to potential lease fees or changed settlements. What is more concerning is the potential unintended safety repercussions leasing could cause. The good owners are able to maintain their vessels during the vessel's downtime. If one vessel is allowed to fish two or more allocations, downtime for maintenance may be pushed to the backburner. This can have negative affects on the seaworthiness of the vessel and the safety of the fishermen.

Please urge the council to vote no on developing a leasing program and keep the fishermen safe at sea.

Sincerely,

Scott DeCosta

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a captain of an independently owned vessel in access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing, much like stacking, will only cause consolidation in the industry. A decade ago, the Council found that those affected most by a consolidation effort would be the captains and crews. Leasing will give larger companies more power and disrupt the system that has made us the most prosperous fishery for the past 20 years. It will put the independent and small fleet owners out of business. Jobs will be lost both on the crew end and on the shoreside end as the large, vertically integrated fleets will have no need for additional crew or outside support. Please urge the council to vote no on developing a leasing program.

Sincerely,

Lewis DeMello

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,
Hudson Frye



-----Original Message-----
From: DAVID LARSEN <janovitz@aol.com>
Sent: Wednesday, June 29, 2022 1:52 PM
To: comments <comments@nefmc.org>
Subject: Atlantic sea scallops limited access leasing scoping comments

To whom it may concern,

My name is David Larsen. I am the captain of the F/v Endeavor and the F/v Intrepid, both limited access scallopers out of New Bedford. I spoke at the meeting in New Bedford on May 11th, 2022 voicing my strong opposition to the idea of leasing in any capacity. I have been a scallop fisherman for thirty five.I have been a captain for thirty of those years.

I fished for five years on a pollock boat out of Dutch Harbor, Alaska, and have seen the terrible results of leasing there. There are roughly five companies that own all of the quota in the pollock fisheries. As a result, the small number of companies that own the quota control the fisheries which includes paying the fisherman a much lower salary. Just a few boats now fish all of the quota and the number of jobs has been reduced drastically.

I feel that as a crew member and not a boat owner, I and my fellow crew members will pay dearly. Not only from losing our jobs as a result of our owners leasing out our boat's quota, but also from the owner charging the crew a leasing fee. The ground fishermen of New England know this all too well. As a result of leasing there are very few ground fishermen left in New England.

As I listened to the different people speak at that May 11th meeting, one thing stood out to me. Not a single captain or crew voiced their opinion supporting the leasing measure. Only owners. We didn't even hear from a single captain who worked for the owners supporting the measure. Where were they? Surely you'd think they'd voice their opinion in support of their owners and the measurement. The simple answer is they didn't support leasing, even though their owners did.

Owners who complained about not being able to find crew members struggled to find crew because fishermen know who pays fairly and who doesn't. I have fishermen come to me looking for jobs constantly. If you pay fairly you will find capable fishermen.

I believe it would be a big mistake to go forward with leasing at any capacity because the crew would ultimately pay the price. Whether it would be from losing their job or paying exorbitant leasing fees, the fisherman would be the one who suffers.

It is my opinion that the fishermen and trades people that work in this industry under the current rules are successfully working as productive members of our society. To change the rules would be detrimental to their ability to do their jobs. Scallop fishing is one of the few blue collar jobs left in this country where one could make a good living without a college degree or a trade. Please allow this fishery to continue to thrive under the current rules.

Thank you
David Larsen
F/v Endeavor
F/v intrepid.

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been in the limited access fleet of the Atlantic Sea Scallop fishery full time for the past six years, but have been fishing every summer since I was 10. My family has been in this industry for generations and my uncle currently owns one full time vessel in the fishery. With my familiarity of this fishery, I can tell you that this fishery does not need and would not benefit from leasing.

As a captain, my first thought is about how this management decision would affect my crew and I. The biggest effect we will see short term is the cut in our paychecks. The lease fees or opportunity cost of a lease fee has to come out of somewhere and it makes no business sense for an owner to absorb that cost. Long term, once consolidation takes place in the industry, we will see jobs cut. Large companies have captains/crews that can run 2+ boats, what would be the need for additional personnel?

My second thought goes to the independent and small fleet owners. My uncle also owns draggers so my family has seen first hand what consolidation measures do to a fishery. Our fishery runs successfully with its current management and benefits all stakeholders. Please urge the council to vote no on developing a leasing program and keep our fishery great.

Sincerely,

Hunter Lees

5/10/22

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a mate on a vessel in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in this fishery for 22 years and I do not believe a leasing program is needed in the LA fishery. Much like stacking, a leasing program will put a lot of hard working people out of work. Leasing will lead to consolidation and put many of the independent and small fleet owners out of business. The Council already did studies showing that DAS leasing, while different than stacking, causes many of the same negative effects on the local communities. The Councils report in Amendment 15 detailed how there would be a negative economic impact on local communities, increased mortality, and consolidation if this type of program was implemented. Why are we going to reopen the same door that the people of this industry asked to be shut?

Please urge the council to vote no on developing a leasing program. It is not needed and it is not wanted.

Sincerely,

Patrick Massimiano

Patrick Massimiano

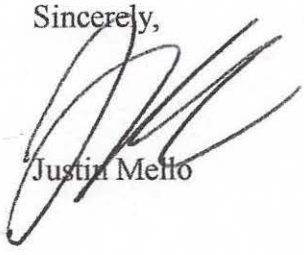
Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Justin Mello and I am currently a First Mate of the F/V Hear No Evil, and F/V Temptress in the limited access fleet of the Atlantic Sea Scallop fishery. Also I have worked for Tempest Fisheries LTD, unloading groundfish, scallops, and squid. I am 29 years old and have been in the industry for 14+ years. My father is an owner of these entities and has been in business since 1994. I am writing to you today to voice my opposition to the implementation of a permit leasing program. I am concerned that implementing a leasing program in this fishery will kill yet another industry in the waterfront, as it has proven to do time and time again. My father and his business partner, at one point owned 4 groundfishing vessels, and 2 scallop vessels. They had foreseen the downward spiral of ground fishing years ago and sold out when they could. Now here are today, facing another unsettling decision looming ahead. Look around. Do the research. And listen to the little guys because we also have an opinion and livelihoods to maintain. Mouths to feed. There was a monopoly law put in place to prevent the biggest companies in the industry from becoming these unstoppable powerhouses. But now they have changed their angle. Is it a coincidence that the biggest players in the game are the biggest supporters of these changes? It's just another angle to get more money through their doors, and squeeze out the little guy. Those in favor of leasing can try to say that these changes are for vessel and crew safety as much as they want. Unfortunately that is not the case. Leasing will force us as fishermen to spend many more days at sea to make less income. All these changes come down to greed. If you ask any veteran scallop fisherman he will tell you that as of right now things are great. We are able to make our money and have time to enjoy our families, why change it? Fishermen have a bad stigma, but we are not all the same. I am speaking for the next generation. The next young man or even now woman who isn't fit for the classroom. But isn't afraid to get their hands dirty and get to work. Please consider other industries that leasing has damaged. And more importantly, the families that will feel it the most.

Sincerely,



Justin Mello

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Tyler Miranda and I am a captain of two full time limited access vessels in the Atlantic Sea Scallop fishery based in New Bedford, MA. I strongly oppose the committee moving forward with the development of a leasing program for the limited access scallop fisheries. I made sure to plan my trips around the scoping meetings in New Bedford because I feel it is extremely important to speak up about this issue. At the scoping meetings, I voiced my opinion on why this would hurt the fisheries as a whole and also the community that depends on it. Amendment 4 established the blueprint that we used today and reiterated the idea of "one boat, one permit." We should not be changing the primary ideology that has allowed our fishery to grow so successful, which has also made the Port of New Bedford the most prosperous in the nation.

Although leasing has been pitched as a good idea, I believe motivation for those in support of leasing in our fishery is financial in nature – reduce operating costs to boost profits. This contradicts the National Standard 5 of the Magnusson Steven's Act, which says no management measure can be rooted in economics and has to be in the best interest of the resource. Our resource will be harmed as permits will be leased from the least efficient vessels to the most efficient vessels. Even two vessels that are of the same baseline can have drastically different harvesting capabilities - for instance, one vessel may be an old and poorly maintained vessel subject to breakdown and mechanical issues while another may be fresh out of a shipyard with the newest technology.

My concerns with leasing are shared by my fellow fishermen. We have seen lease fees be passed down to the crews in other fisheries and know it will be no different in our fishery. Leasing will also reduce the fleet size, which reduces work for the shoreside support businesses. There are so many families that rely upon the health of this fishery and the impacts of leasing could be detrimental to our communities.

Please urge the council to vote no on developing a leasing program and keep our fishery thriving.

Sincerely,

Tyler Miranda

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

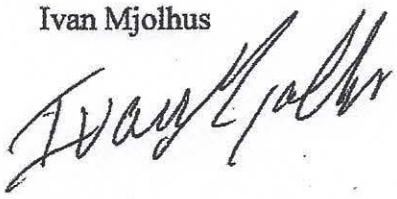
Dear Mr. Nies,

I am currently a captain in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing is another form of consolidation and will have detrimental effects to our fishery. Leasing has not worked well in the groundfish fishery and the members of the scallop fishery do not wish for the same thing to happen to our fishery.

The scallop fishery has made the port of New Bedford the most prosperous port in the nation. We are currently well managed by NEFMC and there is no reason to change our management structure. Please urge the council to vote no on developing a leasing program.

Sincerely,

Ivan Mjolhus



From: Arthur Ochse <ochsearthur@gmail.com>
Sent: Sunday, June 26, 2022 5:09 PM
To: comments <comments@nefmc.org>
Subject: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Thomas A. Nies, Executive Director
New England Fisheries Management Council,
5 Water Street, Mill 2,
Newburyport, MA 01950

Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Director Nies and the New England Fisheries Management Council:

My name is Arthur A. Ochse-Phan III, am a mate on a limited access scalloping vessel hailing out of Stonington, CT. I am against allowing permit leasing and stacking in the Limited Access Atlantic Sea Scallop Fishery. I have seen first hand the negative impacts permit leasing has had on the General Category Scallop Fishery as well as other fisheries that have allowed these types of holdings. I believe that this type of program and the separation of permits from the vessels and fishermen aboard them creates a situation where it is harder for the operators and deck personnel to make a living.

In an age of ever expanding globalization it is important to keep regional products close to their harvest. Another understated impact that stacking and leasing would lead to is the loss of our local seafood industry in small coastal communities. Not only would the ripples of consolidation affect the individuals directly involved in the industry but our national cultural identity is being erased with every small business that is lost. What would the ports of Stonington, CT, Point Pleasant, NJ, Point Judith, RI, etc. be without a small fleet of scallop boats bringing in revenue and supplying local restaurants and markets with fresh local seafood. Besides the major fishing centers where the fishermen are relegated to such as New Bedford, MA and maybe Cape May, NJ our coastlines will continually loose their diversity. Local people will find it harder to eke out a living; as taupe beach mansions replace what once bolstered colorful generations of families who went to sea for a living and put food directly on their tables. These small working ports are the beating heart of the coastal communities which gives them their identity. I passionately hope that this sustainable and mostly well managed resource can remain in the hands of the men and women who work to pry these riches from the sea.

Thank you kindly for your inclusion of us in this conversation, sincerely,

Arthur A. Ochse-Phan III
East Durham, NY

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

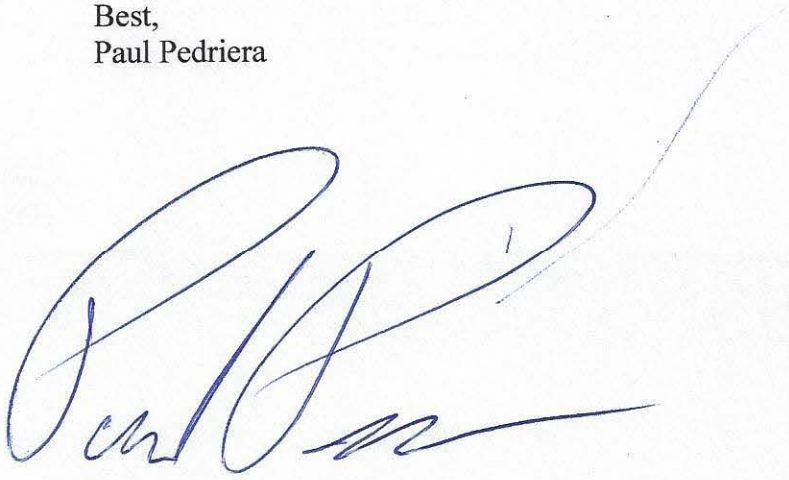
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name Paul Pedreira and I am currently a captain of two vessels in the Limited Access (LA) fleet of the Atlantic Sea Scallop fishery. I have been in this fishery for 30 years and have seen how much the industry has already consolidated. A leasing amendment will only promote further consolidation in this industry. It is already hard enough for us fishermen to become owners of our own vessels and this proposal would eliminate the possibility of us ever working our way up to ownership.

Please vote no on the implementation of a leasing amendment.

Best,
Paul Pedriera



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

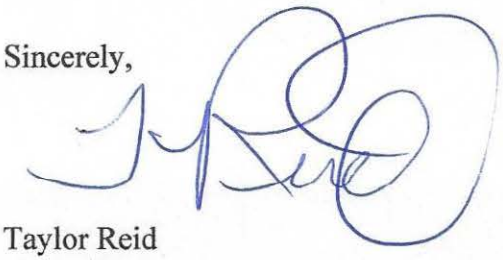
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Taylor Reid and I have been in the limited access fleet of the Atlantic Sea Scallop fishery for 11 years. I started by unloading boats and making trips as a ¼ man. Through hard work and dedication I have made my way to full share, then to engineer and now am a mate of two vessels. This hard work will be in vein if this type of program is implemented in this fishery. When I began my career, the amendment process for stacking was coming to a close. In this amendment, the Council found that stacking and leasing programs would be detrimental to the fishery. A stacking or leasing program will only benefit larger companies financially and it would be at the cost of fishermen, independent and small fleet owners, and shoreside businesses.

My family, much like many others, relies on the success this fishery has provided us. Please do not let our livelihoods be threatened by allowing for this type of management to be implemented. Urge the Council to vote no on implementing a leasing program.

Sincerely,



Taylor Reid

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My family owns four full time scallop vessels in the limited access fleet of the Atlantic Sea Scallop fishery. I am currently the captain of two of these vessels and with my experience, I do not believe a leasing program is needed in the LA fishery. Our fishery has typically been a generational fishery that supports the movement from deckhand to owner, but we are seeing less of this now. With the rising costs of permits and vessels, it is becoming harder for guys to work their way up to ownership. Independent and small fleet owners are being bought out by large fleets and corporations.

The "flexibility" this leasing program is only going to benefit these large, vertically integrated companies in the long run. It is going to be harder for independents to compete and consolidation will take over the fishery. The issues of flexibility would not even be brought up if there were more areas open to us and fishable scallops. We need to focus our efforts on finding new ways to increase our biomass so everyone can continue to fish a healthy resource.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Joseph Santos

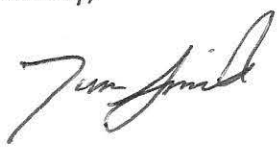
Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a fisherman for 20 years in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. This will impact the small, independent boat owners who will be disadvantaged in the market compared to the large, vertically integrated corporations. The large corporations will have a need to take on new crews and it will lead to loss of jobs for fishermen who work on independent vessels. There will also be independent shore support businesses that will be negatively affected as the large corporations already have in house support. Please urge the council to vote no on developing a leasing program.

Sincerely,



Timothy Smith

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Zachary Storer. I have been scalloping since 2007 and am currently a captain of two Limited Access vessels; F/V Jenna Lee and F/V Miss Shauna. I am writing this letter to say I am 100% against any permit leasing program proposed. This change in management will have no good outcome for us industry men and women. The winners in this program will be the larger corporations and fleets at the financial detriment of us captains and crew and the families we support.

Ideally, my hopes include being in this fishery for another 10+ years - but if this type of management is implemented, I will be forced out of the fishery as it will affect my livelihood. Please urge the council to vote no on this matter.

Best,

Zachary Storer

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a captain in the limited access fleet of the Atlantic Sea Scallop fishery and I have been in this industry for the past 20 years. I work for an independent boat owner and am a supporter of the "mom and pop" operations that built this fishery into what it is. For this reason, I do not feel a leasing program is needed in this industry. No matter which way the program is structured, it will not be to the benefit of the small guy or the fisherman. Ten years ago we were given a preview of our future if a stacking program was to be implemented. The Scientific & Statistic Committee of the Council outlined how our futures in this industry would be grim unless we were a large vertically integrated company. Although Amendment 15 focused on stacking, the Social Impact Analysis study mentioned that although leasing and stacking are two different things, they both are consolidation measures. Consolidation has not been good for the little guy in any industry it has been implemented in. If you go to the docks and talk to the fishermen, the supermajority will not want this type of program.

Please urge the council to vote no on developing a leasing program. We do not need it or any other form of consolidation.

Sincerely,

Kenny Thomas

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RECEIVED
APR 27 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a captain of an independently owned vessel in the limited access fleet of the Atlantic Sea Scallop fishery. As a third generation scallop fisherman, I am well versed both in what our management objectives are and how we can continue to implement them in daily fishing practices. In my experience I do not believe a leasing program would benefit the LA fishery. Leasing gives an advantage to the largest corporations and puts a potential strain on independent and small fleet owners. This strain trickles down to the crews and shoreside businesses working on these vessels. All data regarding leasing points to it being counterproductive for our fisheries management objectives.

Look to other fisheries and how the implementation of leasing has affected their fisheries. That alone should prove that this would be a foolish endeavor to undertake, especially at a time where we should be focusing on promoting a healthy resource and fostering the generation of scallops. Please urge the council to vote no on developing a leasing program.

Sincerely,

Justin Tonnessen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a captain in the limited access fleet of the Atlantic Sea Scallop fishery and have been fishing for over 40 years. I do not believe a leasing program is needed in the LA fishery. Leasing is bad for the industry as a whole and good for the large, vertically integrated corporations that want to control the entire resource. Once this door gets opened, we will see the end of the way of life we are used to. We will see corporate fishing practices like they have in other countries. It will be detrimental to hundreds of families and businesses that rely on this industry to stay as is. Please urge the council to vote no on developing a leasing program.

Sincerely,

Nathan E. Trip III

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

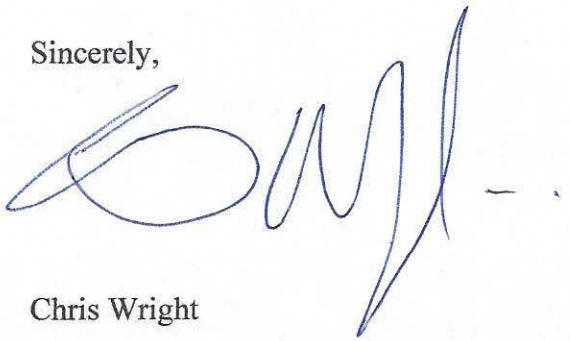
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a third generation fisherman and a captain in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in this industry for 16 years with family in all sectors of the fishery; operators, owners, and processors. I do not believe a leasing program is needed in the LA fishery. We've been through this argument before when stacking was proposed and just as before, the industry as a whole does not want it. Leasing has not worked in other fisheries – just look at the local groundfish boats. Owners are consistently having to pay to lease in pounds of fish to stay afloat. These costs are at least partially, if not completely, passed onto the fishermen. We work hard for a fair wage, which is supported by the "one boat, one allocation" management structure. If leasing is implemented, consolidation will soon follow and our fishery will not benefit from this.

Please urge the council to vote no on developing a leasing program. The majority of the stakeholders of the Atlantic Sea Scallop fishery do not want it.

Sincerely,



Chris Wright

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been in the limited access fleet of the Atlantic Sea Scallop fishery for 15 years and am currently a mate. I am a part of a third generation fishing family has been involved in every step of the sea scallop's life cycle. We have had owners who provide the vessel and allocation, operators who harvest the resource, and processors that prepare the product for consumption. I am very familiar with this industry which is why I do not believe a leasing program is needed in the LA fishery. Leasing will only harm the industry long term as it will cause consolidation. In the process, we will see losses in our wages as fishermen and losses of jobs as the need for good fishermen. Our fishery is prosperous because our current management structure promotes both competitiveness and preservation, leasing would only destroy this dynamic.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Nicholas J Wright

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely, Jaime Alamillo

Jaime Alamillo

F/V Liberty

F/V Beiningen

Position - Deck hand

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,

Paulo Amaral

Paulo Amaral

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. The first scenario is that the fishermen will have to pay lease fees and it will create a financial burden that affects our livelihoods. The second scenario is that the owner absorbs the cost of the lease, but this will also be at the fishermen's detriment. If an independent owner absorbs the lease cost, they will now be that much more disadvantaged in the market. They will have an extra cost that will lead to having less funds to maintain a seaworthy vessel. Depending on what the fishing year looks like, these things combined could put small owners out of business and lead to a large loss in jobs. With these thoughts in mind, please urge the council to vote no on developing a leasing program.

Sincerely,

Robert Amaral

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery and have been participating in this fishery for 14 years. I do not believe a leasing program is needed in the LA fishery. Leasing will mean fewer independent guys in the business, both in ownership and in shoreside support. Our local communities depend on the jobs that these small businesses provide. Without them, we will see fewer jobs. We will see more corporations, who favor an industrial fishing model rather than a community based one like the independent guys do.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Cory Arabian

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. The first scenario is that the fishermen will have to pay lease fees and it will create a financial burden that affects our livelihoods. The second scenario is that the owner absorbs the cost of the lease, but this will also be at the fishermen's detriment. If an independent owner absorbs the lease cost, they will now be that much more disadvantaged in the market. They will have an extra cost that will lead to having less funds to maintain a seaworthy vessel. Depending on what the fishing year looks like, these things combined could put small owners out of business and lead to a large loss in jobs. With these thoughts in mind, please urge the council to vote no on developing a leasing program.

Sincerely,

Nicholas Araujo

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing would not be able to maintain resource neutrality simply because owners with two or more vessels would put the allocation from the older, less efficient vessel onto the newer, more efficient ownership. Even if the 10/10/20 rule was followed the mortality rate would increase, which the Council had highlighted in the discussion regarding DAS leasing in Amendment 10. In the last ten years we have watched our closed areas dwindle - can the resource really afford an uptick in mortality? We need to focus on figuring out how to lower the morality of the scallops, not on a program that would only benefit a few in the long run.

Please urge the council to vote no on developing a leasing program.

Sincerely,

William Lane

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Lucas Berg

L. Berg

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely, Jonathan Bergeron

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

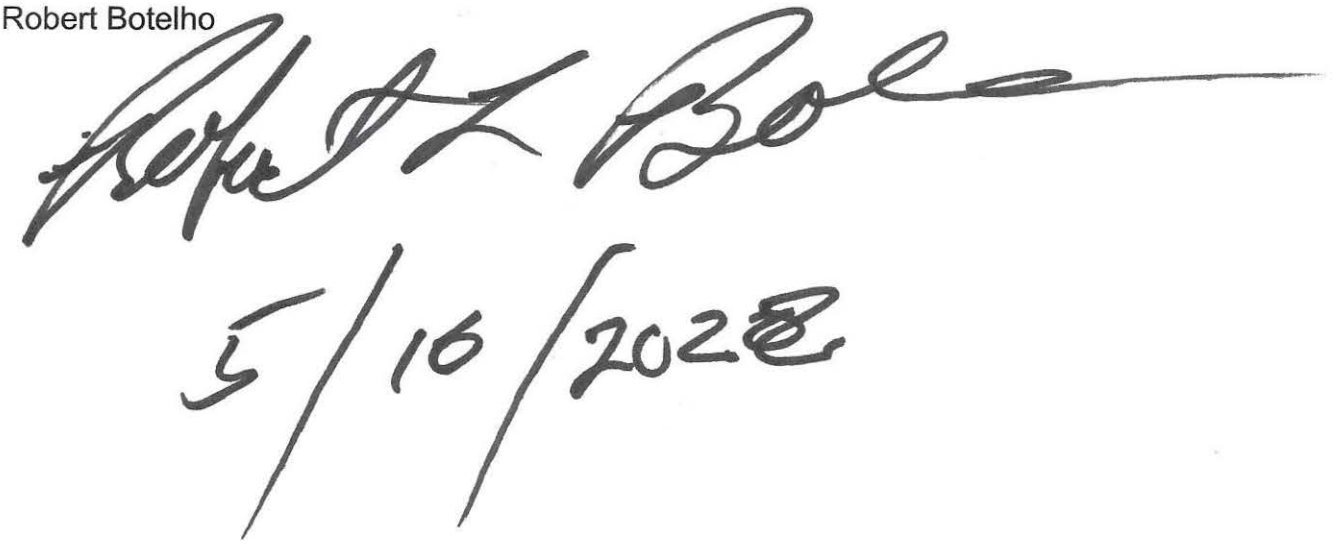
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for 41 years. I do not believe a leasing program is needed in the LA fishery. Although the amendment is not developed, we know the bulk of the costs would come out of the crews. This would not only directly affect our livelihood, but the local economies and jobs that rely on our spending for survival. Another party that will be affected is the shoreside support. The large companies have their own repair shops and do not need independent businesses. Leasing would cause consolidation and put the independent/small fleet owners out of business. The independent shoreside businesses rely on these owners and without them they would have to lay off employees or close down their shops. Please urge the council to vote no on developing a leasing program. It is no good for the small guy.

Sincerely,

Robert Botelho



5/10/2022

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Christian Branco

Christian Branco

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery as it will only lead to consolidation. In every other fishery that has taken consolidation measures, the people at the bottom of the food chain (fishermen in this industry) are the ones who suffer the most. We work very hard for our paychecks and implementing measures that will negatively affect our livelihoods but benefit the large corporations is just wrong. This measure will not benefit our resource or our surrounding communities either.

Please urge the council to vote no on developing a leasing program. The industry as a whole does not need it or want it.

Sincerely,

Morgan Brandso

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing would not be able to maintain resource neutrality simply because owners with two or more vessels would put the allocation from the older, less efficient vessel onto the newer, more efficient ownership. Even if the 10/10/20 rule was followed the mortality rate would increase, which the Council had highlighted in the discussion regarding DAS leasing in Amendment 10. In the last ten years we have watched our closed areas dwindle - can the resource really afford an uptick in mortality? We need to focus on figuring out how to lower the morality of the scallops, not on a program that would only benefit a few in the long run.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Barry Brasidio

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. A leasing program is not needed or wanted in the LA fishery. We have had the most successful, prosperous fishery in the nation for the past 20 years, why change it now? Our success has been partially due to the fact that the fishery belongs to the fishing families and not massive corporations. Leasing will draw more corporations in and cause detriment to the fishery as a whole. Our current management structure promotes the conservation neutrality required by National Standard 8; leasing of any sort will disrupt this. The Council has previously found in Amendment 15 that DAS leasing, even with following the 10/10/20 rule, will cause an uptick in mortality. With the low recruitment levels, we should not even be addressing this issue. We should instead be focusing on how we can nurture the resource for generations to come.

Please urge the council to vote no on developing a leasing program. It is not needed, nor is it wanted.

Sincerely,

Alex Brewster

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

We do not need a leasing program in the limited access fleet of the Atlantic Sea Scallop fishery. I am currently a crewman in Massachusetts that has seen what these type of management styles have done to other fisheries. Our fishery has been so successful because it does not have any sort of leasing or stacking program. If this changes for any reason, it could put a lot of fishermen and shoreside support employees out of work. We have seen the consolidation that leasing and stacking has brought with Ocean Quahogs and groundfish. Scalloping will be no different if this management style is adapted. A select few will own the majority of the permits and the little guy will be forced out of business.

Please urge the council to vote no on developing a leasing program.

Sincerely, Ronald Butilier

Ronald Butilier

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

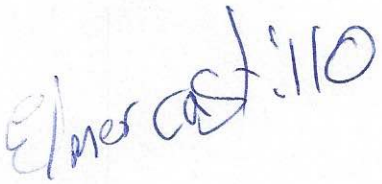
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a crewman from a multigeneration fishing family currently in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing will turn scalloping into a big corporation business and attract outside investment interests that do not have the fishery's best interest in mind. The mom and pop businesses will be forced out of the fishery and lots of people will lose their jobs. Fishermen will be forced into becoming day rate employees and our conditions will deteriorate. Scalloping is one of the last industries that still somewhat belongs to the people of the industry not to big business.

Please urge the council to vote no on developing a leasing program and keep our industry belonging to the fishermen.

Sincerely,



Matt Charest

Thomas A. Nies, Executive Director,

New England Fishery Management Council,

50 Water Street, Mill 2,

Newburyport, MA. 01950

Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Director Nies and the New England Fishery Management Council,

We are crew members who work on a limited access full time one dredge boat, fishing out of Stonington, CT. We are not in favor of the proposal for a leasing program in the limited access sea scallop fishery. Some of us have fished in the General Category sea scallop fishery and have seen first hand what leasing has done to reduce the wages and the ability to earn a living in that fishery.

We are concerned that leasing in the limited access sea scallop fishery will result in reduced wages and we will not be able to support our families. From our experience in the Gen Cat fishery the leasing fees are always passed onto the crew expenses. We do not support a leasing program in the limited access fishery, as we believe the fishery is successful. Thank you for your consideration.

Luke Conway Beacon, NY.

Anthony Mintiens Little Egg Harbor, NJ.

Daniel Leigh Little Egg Harbor, NJ.

Yubilian Ottermann Brick, NJ.

RECEIVED
JUN 21 2022
NEW ENGLAND FISHERY MANAGEMENT COUNCIL

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a fourth generation scallop fisherman currently working as a crew member on my family owned vessels. A leasing program would not only be horrible for my family's business, but also the majority of the stakeholders in the fishery. Leasing will cut the fleet in half and eliminate much needed employment opportunities, especially in New Bedford. I have lived in New Bedford for my whole life – a large portion of our area is dependent on the small fleet and individual owners for its livelihood. Please urge the council to vote no on developing a leasing program. Our fishery is fine the way it is, leave it be.

Sincerely,

Jarid DeMello

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,

Jimmy Fernandez

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery as it would only benefit the large, vertically integrated fleets. The Council has found that consolidation efforts have been to the detriment of the independent fleet owners, fishermen, and shoreside support companies. We are currently facing declining trips as a result of low biomass. The whole fleet would benefit from more trips, which is why we should be focusing our efforts on promoting the resource. Please urge the council to vote no on developing a leasing program and ask them to help us find new ways to promote the resource.

Sincerely,

Cody Fish

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. The first scenario is that the fishermen will have to pay lease fees and it will create a financial burden that affects our livelihoods. The second scenario is that the owner absorbs the cost of the lease, but this will also be at the fishermen's detriment. If an independent owner absorbs the lease cost, they will now be that much more disadvantaged in the market. They will have an extra cost that will lead to having less funds to maintain a seaworthy vessel. Depending on what the fishing year looks like, these things combined could put small owners out of business and lead to a large loss in jobs. With these thoughts in mind, please urge the council to vote no on developing a leasing program.

Sincerely,

Isidro Flores A.

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely,
Alan Gabriel

AG

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

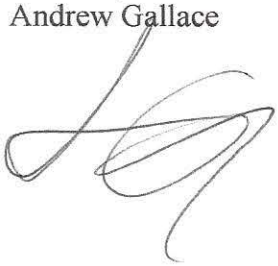
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,
Andrew Gallace



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely, Eric garcia

Eric Garcia

DECKHAND

LIBERTY AND BENIGEN

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,

Angel Gonzalez G.

Angel Gonzales Garza

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Kyle Geltzeiler and I have been working in the Atlantic Sea Scallop Limited Access fishery as a scalloper for two years. Prior to finding my passion for working as a crew member on these vessels, I was a fishery observer for two years. In my experience, I believe the implementation of any type of permit leasing program will ultimately lead to higher mortality and fewer fishable scallops. We as fishermen rely on an abundance of scallops to maintain a healthy fishery that continues to support us and our families' livelihoods. Please urge the council to vote "No" on the implementation of leasing in the Atlantic Sea Scallop Limited Access Leasing.

Best,

Kyle Geltzeiler

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Us fishermen work very hard when we are out at sea. If leasing is implemented, I fear it will create consolidation in the industry and have negative effects on our jobs. Consolidation puts the small owners out of business and the fishermen on those boats will ultimately lose their jobs. The large companies already have crews and do not have need for the guys from the small fleets. My whole life I have been a fisherman, it is my way of life and I don't wish it to change.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Angel Gonzales

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. A leasing program is not needed in the LA fishery. We have the most successful fishery in this nation, why would we do anything to potentially jeopardize this? There are hundreds of families that rely on the LA fleet for their livelihood. From my understanding, this type of program has been horrible for most stakeholders in other fisheries. The majority of the stakeholders in this industry do not want this type of program, since it would only benefit a select few organizations in the long run. We instead want the Council to focus on opening more areas, especially since we are losing a lot of our grounds to the windmills.

Please urge the council to vote no on developing a leasing program. The people of the industry do not have a want or a need for it.

Sincerely,

George Gottiaux

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,
Ashton Green



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been crewman in the limited access fleet of the Atlantic Sea Scallop fishery for more than 20 years. I do not believe a leasing program is needed in the LA fishery. Leasing will cause consolidation and it will directly affect our paychecks. We look at the other fisheries that have implemented leasing and we can see that it has never worked in the fishermen's favor. Our industry is so successful because we have the one boat, one permit management structure. Please urge the council to vote no on developing a leasing program.

Sincerely,

Ben Griffith

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Jaime Cesar Guzman

Jaime Guzman

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,
Mark Hebert



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Matt Hebert Jr and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in the industry for two years and also have a brother currently working in the industry. I am writing to you today to voice my opposition to the implementation of a permit leasing program. I am concerned that implementing a leasing program in this fishery will lead to increased mortality resulting in a declining biomass and fewer trips in the future. The potential change in lay for crew via changed settlements or lease fees will also have a negative economic impact on the families who rely upon our pay.

Please urge the council to vote no on implementing a leasing program as it is necessary to keep our waterfronts in the hands of the fishermen who have made it so successful and the small shoreside support business that have worked alongside them.

Sincerely,

Matt Hebert Jr.



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Israel Hernandez and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. Let me start by saying that a leasing program is not needed in the in the LA fleet. We have one of the most prosperous, successfully managed fisheries in the nation. The Council has already implemented plenty of measures to allow for flexibility in the Atlantic Sea Scallop fishery. We have seen how leasing has affected other fisheries and I do not believe our fleet will benefit from it in the long run. Leasing will lead to the loss of jobs and hurt local economies that depend on these jobs.

Please urge the council to vote no on developing a leasing program and keep the scallop industry belonging to the scallop fishermen.

Sincerely,



Israel Hernandez

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

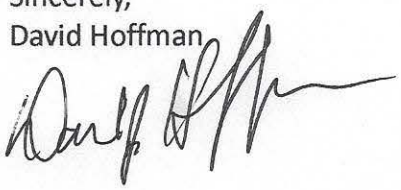
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing would not be able to maintain resource neutrality simply because owners with two or more vessels would put the allocation from the older, less efficient vessel onto the newer, more efficient ownership. Even if the 10/10/20 rule was followed the mortality rate would increase, which the Council had highlighted in the discussion regarding DAS leasing in Amendment 10. In the last ten years we have watched our closed areas dwindle - can the resource really afford an uptick in mortality? We need to focus on figuring out how to lower the morality of the scallops, not on a program that would only benefit a few in the long run.

Please urge the council to vote no on developing a leasing program.

Sincerely,
David Hoffman



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I, like most fishermen, do not believe a leasing program is needed in the LA fishery. The past year proved that our fishery is one of the most successful. The prices have been high and the yield has been decent, which should have allowed for plenty of "flexibility" for boat owners. Right now, the owners of the vessels have plenty of time to schedule maintenance and keep their boats up to date. If leasing was allowed, it could potentially eliminate that needed down time for repairs and maintenance that keep us safe while we are out at sea.

Please urge the council to vote no on developing a leasing program. We are doing well as is and the majority of the fishery does not want this.

Best,

Jack Houghton

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely, Alex Hutchins

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,

Tyler J. Hutchens

Tyler John Hutchens

Deckhand F/V Liberty + Beiningen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,

Antonio V. Inacio

A.I.

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past decade. I do not believe a leasing program is needed in the LA fishery. Leasing will lead to the decline of the Atlantic Sea Scallop fishery. The fishermen will see job loss and cut wages. We will be unable to provide for our families, especially with the cut in allocation that we are seeing.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Andres Ixcuna

Andres Ixcuna

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for five years, but previously participated in the longline swordfish and tuna fisheries. I do not believe a leasing program is needed in the LA fishery. In my previous fishery, the management style changed to IFQ causing consolidation which put me out of a job. I believe a leasing program in this fishery will cause the same consolidation as the IFQ program and put a lot of smaller guys out of business. It will also hurt the fishermen because the lease fees will probably be passed onto us in our settlements if our owners lease allocation in.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Kyle Jackson



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely, Tom JINAGRE

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,
Randy Jorgensen



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is William Knowles and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. For us in the industry fishing is more than just a job, it is a way of life. Take the New Bedford waterfront for example- we have our own communities and businesses that support us in all the ways they can. We have families that are accustomed to the the quality of life our industry provides. If leasing within the LA fleet is implemented, this could all be disrupted. As a fisherman in this industry, I will probably see lease fees implemented which will affect my pay tremendously. This change in management will affect more than just me though, it will wreak havoc on the local economies that depend on us scallop fishermen. I fear leasing will not only affect me but will ultimately lead to consolidation and have a negative effect on independent and small fleet owners and the independent shoreside businesses.

Please urge the council to vote no on developing a leasing program and keep the scallop industry belonging to the scallop fishermen.

Sincerely,

William Knowles

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 20 years and in my experience I can say a leasing program is needed or wanted in the LA fishery. If leasing is implemented, it will be a short time before consolidation takes place. The fishermen know that once this happens our way of life will be disrupted and we will become more like factory workers than fishermen. A lot of guys will quit once leasing is implemented and lease fees trickle in, but even more will leave the industry once the dynamic completely changes.

Please urge the council to vote no on developing a leasing program. Fishermen have our own way of life and culture and this sort of change will only lead to the extinction of the present day fishing culture.

Sincerely,

Jaroslaw Kozlowski

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

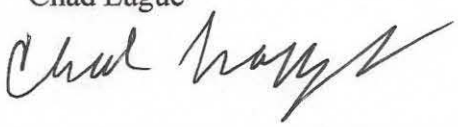
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,
Chad Lague



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The flexibility that some are asking for is very similar to what the general category has, which leads me to believe we will be charged for the lease fee just like they do. This will directly affect our livelihoods as it will decrease our pays. We will have less to spend in our local economies, which will also cause a trickle down effect on those who rely on our spending. This type of proposal is no good for anyone besides the large corporations.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Jose Landeros Jr Jose Landeros Jr

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Ross Larsen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for 12 years. I do not believe a leasing program is needed in the LA fishery. It will only make our fishery unsafe. Scalloping in the LA fishery is so great because our hard work results in larger stocks which translates to larger shares for the fishermen. If leasing is implemented, those fees will more likely than not be passed down to us and cut into our pays. I can see a lot of guys leaving because of this because it will no longer be worth it for them to stay scalloping. Those who do stay will be forced to deal with smaller wages and may not care as much, which could lead to unsafe conditions. The majority of this industry knows leasing will only be good for the big companies and that's why the majority of the industry is opposed to leasing.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Jeremy Lambalot

Jeremy Lambalot

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Scallopers are already facing high fuel costs and if leasing is implemented, the fees associated would make it not worth it for us to go fishing. The economic consequences of this decision could be disastrous and could put a lot of crews out of business.

Please urge the council to vote no on developing a leasing program.

Sincerely,

ARNLDO LA TORRE

Arnaldo LaTorre

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing would bring consolidation to the fishery and would result in a loss in jobs. The one or two boat owners would not be able to stay in business in the long run and will be forced out of the industry. The large companies in this industry already have their own crews and do not have a need to hire more guys, they will just give their crews more trips on more boats. Us crews that work on the smaller boats will then have no work.

Please urge the council to vote no on developing a leasing program. It is no good for anyone but the big guys in the long run.

Sincerely,

Ben Leuvelink

Ben Leuvelink

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Luis Linhares

Luis Linhares

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a crewman in the limited access fleet of the Atlantic Sea Scallop fishery and I have been in this industry for about 20 years. I work for an independent boat owner currently. I do not believe a leasing program is needed in this industry. These programs only benefit the large fleet owners and corporations as they cause consolidation in the industry. If consolidation occurs in our industry, the independent and small owners will go out of business. The fishermen will be affected to as we will probably be the ones to take on the lease fees whether it be a flat fee or a changed settlemenet. Our families depend on this industry and its health, please do not jeopardize this in order to benefit a select few wealthy individuals/corporations.

Please urge the council to vote no on developing a leasing program. Keep our industry belonging to the people that make it so great.

Sincerely,

Jose Manuel Lopez

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Marc Lorenz and I am currently a crewman in the Atlantic Sea Scallop Limited Access fishery. I have been in the industry for about five years now. I am writing my opposition to the implementation of the permit leasing program. I am worried that the implementation of the permit leasing program will increase mortality and lead to a declining biomass in the fishery. I am also concerned that the lease fees will be passed onto the crew and affect my family and I economically.

Please keep the fishery in the hands of the men and women who have made it successful and urge the council to vote no on the implementation of a leasing program.

Best,

Marc Lorenz

Marc Lorenz

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. We are doing very well as an industry. I do believe there is a need to open more areas though. It is not looking like there is going to be any closed areas in the 2023 fishing season. I would like the Council to look into ways to open other areas that have aging, fishable scallops as this would benefit the whole industry.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Alexander Lozano

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery and it is not wanted by the majority of people in the industry. The fishermen believe the management style we currently have works very well and we think it's why our fishery is the most prosperous in the country. We are rewarded for our hard work with fair prices and settlements. With leasing comes consolidation and we all know the fisherman is going to be the first affected when that happens. While there is no need for leasing, there is a need for more fishing areas to be opened.

Please urge the council to vote no on developing a leasing program. We would much rather have the Council focus on opening more areas for us to fish.

Sincerely,

Jaime Loredo

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Marc Lorenz and I am currently a crewman in the Atlantic Sea Scallop Limited Access fishery. I have been in the industry for about five years now. I am writing my opposition to the implementation of the permit leasing program. I am worried that the implementation of the permit leasing program will increase mortality and lead to a declining biomass in the fishery. I am also concerned that the lease fees will be passed onto the crew and affect my family and I economically.

Please keep the fishery in the hands of the men and women who have made it successful and urge the council to vote no on the implementation of a leasing program.

Best,

Marc Lorenz

Marc Lorenz

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. We are doing very well as an industry. I do believe there is a need to open more areas though. It is not looking like there is going to be any closed areas in the 2023 fishing season. I would like the Council to look into ways to open other areas that have aging, fishable scallops as this would benefit the whole industry.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Alexander Lozano

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Julio Lucas and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Many of us will be negatively affected if something like this is implemented. The fishermen in other industries are paying for their allocation of fish, so we have to assume the same thing will happen to us if leasing is put through. These fees may force guys who do not care about the longevity of the resource to only take the big stuff so they can make a paycheck. Leasing will put a strain on our resource and as of right now we cannot afford to lose any more of it with windmills and loss of days.

Please urge the council to vote no on developing a leasing program and keep the scallop industry belonging to the scallop fishermen.

Sincerely,



Julio Lucas

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 24 years. I do not believe a leasing program is needed in the LA fishery. Looking at other fisheries, the crews typically have to bear the burden of the lease cost. We are already facing a decreased income as a result of fewer trips, we cannot also afford to pay lease fees on top of that. We need to focus on coming up with better science and ways to promote our resource's health. Please urge the council to vote no on developing a leasing program.

Sincerely,

Celso E Cervantes Morales

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,

Mario Macedo

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing, just like any other form of consolidation, will lead to the decline of the industry. Fishermen will not be able to provide for their families because they will be expected to bear the brunt of the costs associated with the lease fees. Please urge the council to vote no on developing a leasing program.

Sincerely,

Miguel Colaj Mateo



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely, Antonio Mda

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely, Hunter Major

Mate of F/v Liberty and F/v Beiningen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 13 years. I am against consolidation measures in the industry as it will eventually force the small fleet and independent owners out of the industry. Seeing how other fisheries charge their crews for lease fees also tells us that we will probably be charged lease fees as well which will decrease our income. Leasing's definition is considered different from permit stacking, but it is clear they both will have the same effect. Please urge the council to vote no on developing a leasing program and keep our fishery belonging to the people.

Sincerely,



Pavel Matsko

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for seven years. In these last couple years, my life has been dramatically changed for the better as a direct result of the income the current management structure has allowed me to make. With my hard work in the fishery, I was able to move my family out of a neighborhood plagued with violence to a home in a good neighborhood that provides enough room for us and includes a back yard.

For many of us, scallop fishing is the only way of life we know. Looking to other fisheries, it is clear leasing would negatively affect us and add an additional barrier to prevent us from making a better life. I have seen this first hand with my father who has been a ground fishermen affected by lease fees. The crew suffered from the lease fees because the owners had to pass along the expense in order to stay in business.

Our fishery is proof that with hard work and determination, anyone can make a better life for themselves. This is supported by the management of "one boat, one permit." Please urge the council to vote no on developing a leasing program.

Sincerely,

Guillermo Novoa

5/10/22

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Minh Nguyen and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe there is a need in the LA fleet for any type of leasing program. Our fishery is very successful because it is a fishery belonging to all different types of owners. There is currently room for both small companies and large companies. If leasing of any kind is implemented, the large businesses will be able to push the small businesses out of business. Fishermen will lose their jobs and lose wages. Leasing is no good for anyone but the big companies.

Please urge the council to vote no on developing a leasing program.

Sincerely, Minh

Minh Nguyen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Urg Nguyen and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in this industry as a crewman for 30 years and have seen it in all its recent cycles. I do not believe there is a need in the LA fleet for any type of leasing program. We are doing well with the current management and leasing would only benefit the large, vertically integrated companies in the long run. We see how much of the lease is taken out of fishermen in other industries and do not think it will be good for our livelihoods. Everyone in the LA fleet is making money and doing well right now, please do not change this.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Urg Nguyen Urg Nguyen

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 20 or so years. I have seen various cycles of this fishery and I do not believe a leasing program is needed in the LA fishery. I believe that we need to find new ways to promote our resource so we can continue to fish it. Leasing is going to benefit the large, vertically integrated fleets. In other fisheries, the fishermen are made to bear the brunt of the lease fee and the independent owners struggle to compete with the large owners. The scallop fishery will be no different from these fisheries if leasing is implemented. Please urge the council to vote no on developing a leasing program.

Sincerely,

Alejandro Olveira

12:12 5GUC 100%
General-Lette... Save

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Sca fishery. I do not believe a leasing program is needed in the LA fishery. Although v not have parameters of what this program will contain, we can look at other fisher that have implemented leasing as a guide of what could come. Other fisheries tha for leasing have dealt with consolidation, which has caused loss of jobs and wage the fishermen. We have seen fishermen be charged with lease fees or have had lay changed. The scallop fishermen work hard for their pay and this would only cr an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The r of stakeholders in the industry do not want it or need it.

Sincerely,

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. If the vessels are allowed to have two allocations on them, when will they have time to do necessary maintenance? Although we have been allocated less trips, it is taking us longer to get a full closed area trip. It concerns me that harvesting the allocated pounds may take priority over giving the vessel down time to make repairs. Our season currently allows for a healthy balance between fishing and non-fishing time that has allowed the vessel owners to keep their vessels up to date and a leasing program may introduce a new time constraint. More time constraints and pressure means less flexibility to schedule repairs. When we are out at sea, we simply want to be safe and do our jobs. This leasing program would jeopardize that.

Please urge the council to vote no on developing a leasing program. It is necessary for vessels to have downtime to be worked on and remain seaworthy.

Sincerely,

Zachary Olivier

Engineer on F/V Liberty & F/V Beininger

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a second generation fisherman in the limited access fleet of the Atlantic Sea Scallop fishery. I have been a crewman for the past five years and I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture and way of life that is unique to them. Leasing will lead to consolidation which will lead to fishermen being treated like factory workers. It will destroy our independent identities that we have curated throughout history.

Before becoming a crewman, I worked for an independent shoreside business. These businesses will also be directly affected by a leasing program. If leasing is allowed, there could be the potential to eliminate up to half of the vessels in our fishery. This would mean half as many vessels for shoreside businesses to work on, which would put a lot of these companies out of business.

Please urge the council to vote no on developing a leasing program. There are only a select few that will benefit from this measure – the majority of the stakeholders will not.

Sincerely,

Torin Pacheco

Torin Pacheco

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Antonio M Pacheco

ANTONI M. PACHECO

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

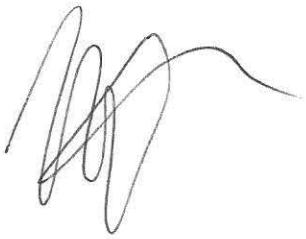
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for more than a decade. I do not believe a leasing program is needed in the LA fishery. It will lead to loss of wages for the fishermen. We will see owners either charge us the lease fee or change the settlement to cover the cost of leasing. We are already seeing a declining allocation in the upcoming years, the fishermen cannot afford to have these additional expenses. Please urge the council to vote no on developing a leasing program.

Sincerely,

Matthew Pacheco



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have worked as crewman in the limited access fleet of the Atlantic Sea Scallop fishery for 18 years. I do not believe a leasing program is needed in the LA fishery. A fisherman's job is very hard and dangerous as it is. We leave our loved ones at home and brave the elements out on the ocean to harvest scallops and bring home a paycheck to support our livelihoods. If leasing is put through, we know we will have to bare the brunt of the lease fees and costs as it would not make any business sense for the owner to absorb this cost solely.

Please urge the council to vote no on developing a leasing program. We work hard as fishermen and leasing would only make our job harder.

Sincerely,

Sergey Panfilov

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

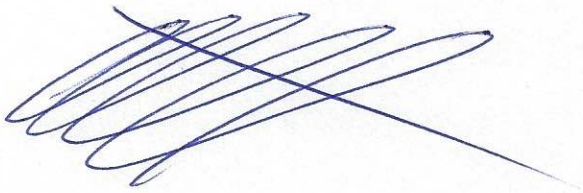
Dear Mr. Nies,

My name is Branden Patterson and I have been a crewman in the Limited Access fleet in the Atlantic Sea Scallop fishery for seven years. I am writing in today to voice my concerns and opposition to a leasing program within this fishery. I fear that this style management will encourage high grading and lead to fewer fishable scallops. I am also concerned with how the potential lease fees will be passed onto the crew and how it may affect our livelihoods.

Please urge the council to vote "No" on the implementation of leasing in the Atlantic Sea Scallop Limited Access Leasing.

Best,

Branden Patterson



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing would not be able to maintain resource neutrality simply because owners with two or more vessels would put the allocation from the older, less efficient vessel onto the newer, more efficient ownership. Even if the 10/10/20 rule was followed the mortality rate would increase, which the Council had highlighted in the discussion regarding DAS leasing in Amendment 10. In the last ten years we have watched our closed areas dwindle - can the resource really afford an uptick in mortality? We need to focus on figuring out how to lower the morality of the scallops, not on a program that would only benefit a few in the long run.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Everit Pearce

Everit Pearce

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. If the vessels are allowed to have two allocations on them, when will they have time to do necessary maintenance? Although we have been allocated less trips, it is taking us longer to get a full closed area trip. It concerns me that harvesting the allocated pounds may take priority over giving the vessel down time to make repairs. Our season currently allows for a healthy balance between fishing and non-fishing time that has allowed the vessel owners to keep their vessels up to date and a leasing program may introduce a new time constraint. More time constraints and pressure means less flexibility to schedule repairs. When we are out at sea, we simply want to be safe and do our jobs. This leasing program would jeopardize that.

Please urge the council to vote no on developing a leasing program. It is necessary for vessels to have downtime to be worked on and remain seaworthy.

Sincerely, OSVALDO PEIXOTO

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely, VITOR PINTO

Vitor Pinto

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely,
Giovanni Pinto

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past four years. I do not believe a leasing program is needed in the LA fishery. We are all doing well and our fishery is considered to be one of the best in the nation, why should anything change? The crews are work hard for their shares and leasing could potentially put a burden on this segment of the industry in the form of lease fees or changed lay. This style of management would also allow for permit holders to directly benefit financially (from the lease fees) at our expense.

Please urge the council to vote no on developing a leasing program. We work hard to provide for our families and do not deserve the repercussions this management style could bring.

Sincerely,

KRYSZTOF POLAK

Krystof Polado

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely, Patrick Previty

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Jonathan Ramos and I am currently a crewman on two vessels in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in the industry for the last three years and plan on continuing my work in the industry. I am writing to you today to voice my opposition to the implementation of a permit leasing program. I am concerned that implementing a leasing program in this fishery will lead to negative economic impacts on fishermen such as myself. In other fisheries, the lease fee is taken out of the crew. I am also concerned that there could be a loss of jobs in the long run as it will be harder for independent and small fleet owners to stay in business and that will eliminate the need for the crews on those vessels.

Please urge the council to vote no on this proposal that will open the door to create these issues in a fishery that us currently very successful and benefits all shareholders.

Sincerely,

Jonathan Ramos

Jonathan Ramos

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Our families depend on the livelihood scallop fishing provides us. Some of us in the industry are also the sole providers for our families. Leasing would directly affect that income because the cost of the lease is probably going to be taken out of us. It would make no sense for a business, especially a small company that has less market bargaining power, to cut into their margins instead of charging us. This management change is only to put the small fleets and independents out of business by consolidating the fishery. Please urge the council to vote no on developing a leasing program and prevent this from happening.

Sincerely,

Andrew Rapoza



5-10-22

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing is only a consolidation measure that will have detrimental effect on the small guys at the benefit of the large, vertically integrated fleets. We know that the cost of the lease will trickle down to the crew whether it be through fees or changed settlements. The independent and small fleet owners that have been in this fishery for generations will be forced out of business as they will not be able to compete. Captains and crews of the independent vessels/small fleets will then be out of a job because there will be no need for those crews.

My father-in-law is an independent vessel owner. Their vessel is family run and has allowed his family to live off of it for the past 30 years. The majority of owners in this fishery own one or two boats that have allowed them to do the same thing. Please do not let the Council change the management that has allowed for this. Urge the council to vote no on developing a leasing program.

Sincerely,

Zachary Rapoza

Zachary Rapoza 5/10/22

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

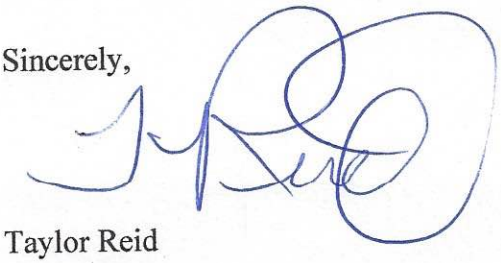
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Taylor Reid and I have been in the limited access fleet of the Atlantic Sea Scallop fishery for 11 years. I started by unloading boats and making trips as a ¼ man. Through hard work and dedication I have made my way to full share, then to engineer and now am a mate of two vessels. This hard work will be in vein if this type of program is implemented in this fishery. When I began my career, the amendment process for stacking was coming to a close. In this amendment, the Council found that stacking and leasing programs would be detrimental to the fishery. A stacking or leasing program will only benefit larger companies financially and it would be at the cost of fishermen, independent and small fleet owners, and shoreside businesses.

My family, much like many others, relies on the success this fishery has provided us. Please do not let our livelihoods be threatened by allowing for this type of management to be implemented. Urge the Council to vote no on implementing a leasing program.

Sincerely,



Taylor Reid

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,

Erick David Rodriguez

erv Dwl Rodrigue

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Oscar Rodriguez and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I have been in the industry for approximately 30 years and have seen the industry go through all its cycles. I am writing to you today to voice my opposition to a permit leasing program. I am concerned that implementing a leasing program in this fishery will lead to negative impacts on me and my fellow crew. During my time in the industry I have seen various proposals for these types of programs that will ultimately benefit very few entities in the long run.

Our fishery is one of the most successful in the world because of its current management. Please vote no on beginning the process to develop an amendment process. We do not need it and the majority of us do not want it.

Sincerely,

Oscar Rodriguez

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,
Carlos Reyes

Carlos Reyes

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery and have been in the fishery for the past 20 years. I do not believe a leasing program is needed in the LA fishery. Leasing is another attempt at consolidation in the industry and will lead to the decline of the fishery. Fishermen are going to see loss of income and will be unable to provide for their families. We are currently seeing less closed area trips being allocation. Why don't we figure out why this is happening before taking up an elective program that will only benefit a select few individuals? More trips benefits everyone from the fishermen to the owners to the shoreside support. Please urge the council to vote no on developing a leasing program and to focus on something that benefits all stakeholders.

Sincerely,

Tony Rodrigues

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,

Daniel Rowell



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,

Lance Ruelas

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 18 years. In my experience, I do not believe a leasing program is needed or necessary in the LA fishery. Leasing is just another form of consolidation and will put small business owners out of business. This industry is so successful today because of those same small business owners who have made scalloping a major part of their lives. The individual and small fleet owners always make sure that their crew is rewarded for their hard work and that their vessels are well maintained. If leasing is implemented, the corporations will eventually own the whole industry as they will be able to force the small guys to sell out. The large entities will have no problem using their economic power to lower the fishermen's lay or charging lease fees once this happens too. Everyone is doing well right now, we should not be focused on reinventing the wheel.

Please urge the council to vote no on developing a leasing program.

Sincerely,

William Rush

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. We instead need to focus on how we can better our fishery for all stakeholders by figuring out why we are not getting the estimated trips out of each area as well as figuring out how to keep our closed areas fishable. Leasing is only going to be beneficial to the permit owners that have large fleets. The fishermen are going to end up being charged lease fees, just like every other fishery is charged for allocation/quota and the small fleet owners will not be able to compete with the big fleets.

Please urge the Council to vote no on developing a leasing program.

Sincerely,

Ian Ruml

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. The first scenario is that the fishermen will have to pay lease fees and it will create a financial burden that affects our livelihoods. The second scenario is that the owner absorbs the cost of the lease, but this will also be at the fishermen's detriment. If an independent owner absorbs the lease cost, they will now be that much more disadvantaged in the market. They will have an extra cost that will lead to having less funds to maintain a seaworthy vessel. Depending on what the fishing year looks like, these things combined could put small owners out of business and lead to a large loss in jobs. With these thoughts in mind, please urge the council to vote no on developing a leasing program.

Sincerely,

JOSHUA DAVID SANTILLAN

Joshua D. Santillan

DECK HAND

LIBERTY AND BEINIGEN

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,
Doug Simmons



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely,

Alexey Shlak

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. If the vessels are allowed to have two allocations on them, when will they have time to do necessary maintenance? Although we have been allocated less trips, it is taking us longer to get a full closed area trip. It concerns me that harvesting the allocated pounds may take priority over giving the vessel down time to make repairs. Our season currently allows for a healthy balance between fishing and non-fishing time that has allowed the vessel owners to keep their vessels up to date and a leasing program may introduce a new time constraint. More time constraints and pressure means less flexibility to schedule repairs. When we are out at sea, we simply want to be safe and do our jobs. This leasing program would jeopardize that.

Please urge the council to vote no on developing a leasing program. It is necessary for vessels to have downtime to be worked on and remain seaworthy.

Sincerely,
Jessie Smerald



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Michael Soto and I am a third generation fisherman in the limited access fleet of the Atlantic Sea Scallop fishery. I've been in the industry for three years. I am writing today to ask you to urge the council to vote no on implementing a leasing program. This type of program has the potential to disrupt my life and my family who depend on my work. In previous proposals for similar programs, the Council found that the fishermen and surrounding communities would suffer while the larger, vertically integrated companies would profit. Most of us fishermen would prefer to work for smaller fleets or independent owners than large companies. The research done during Amendment 15 shows these independent and small fleet owners will have a hard time staying in business. History in other fisheries shows that many of these owners will eventually be pushed out of the industry. Along with this, fishermen have to bear the burden of the lease fees. This type of program has the potential to endanger our livelihood and we work too hard to have that happen.

Please urge the Council to vote no on implementing a leasing program.

Sincerely,

Michael Soto

Michael Soto

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. There are hundreds of families who depend on the livelihood made by scallop fishing. Leasing would cause consolidation, which the Council has already found consolidation measures harm the little guys. Consolidation means the big companies will get more power and be able to control the market more. The fishermen will be the first to suffer with loss of wages. The small fleet and independent guys will be next as they won't be able to compete with the big companies. The shoreside businesses that rely on the independent guys will then lose business. Please urge the council to vote no on developing a leasing program. This is no good for anyone.

Sincerely,

Justin Souza

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Andrew Spalt and I am currently a crewman in Limited Access (LA) fleet of the Atlantic Sea Scallop fishery as well as an owner of a vessel that fishes for lobsters in closed area 3 and in the Limited Access General Category (LAGC) fleet. In my experience in the LAGC, I have witnessed the quota become a tightly guarded commodity held by a very few who profit off of fishermen's labors. Currently in the LAGC fleet, 35% of my gross trip value goes to the purchase of quota.

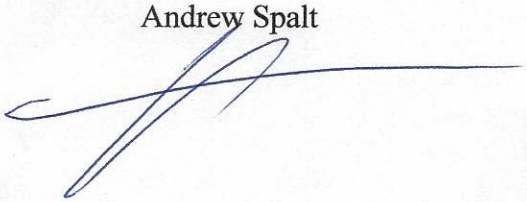
If any type of leasing of permits is allowed in the LA fleet, I believe the fishermen will pay the price. With the current rate of inflation causing an increase in crew expenses (fuel, food, gear maintenance, etc.), fishermen are already seeing a decline in their wages. The introduction of lease fees or changed settlements will hurt the fishermen and the communities that rely upon them.

Another major issue I feel would be of concern is the consequences of leasing amendment on a vessel's sea worthiness. The first thing that will take a back seat will be the vessel's maintenance. Owners will be financially ground down to nothing trying to make it on vessels that really shouldn't be offshore - putting lives at risk.

Please urge the council to vote no on the implementation of a permit leasing program within the Limited Access fleet.

Best,

Andrew Spalt



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

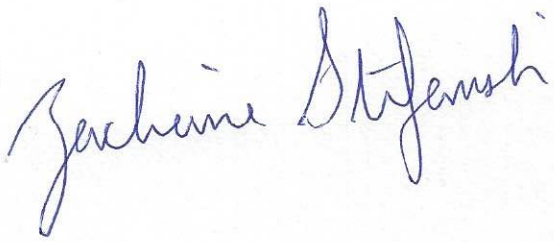
Dear Mr. Nies,

My name is Zacharie Stefanski and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I am a third generation fisherman and I have been in the industry for 18 years. I am writing you today to voice my opposition to any sort of leasing program in the limited access fishery. This management will lead to consolidation in our fishery, which will invite more corporations who know nothing about fishing into the industry. Our history will then be destroyed and our communities will feel the negative effects that come along with consolidation. Independent and small fleet owners as well as independent shore support businesses will be forced out of the industry. Just like with the draggers, scallop fishermen will have to pay lease fees. Leasing will only be good for the large vertically integrated companies. Our industry runs well as is, there is no need for leasing.

Please urge the council to vote no on developing a leasing program and keep the scallop industry belonging to the scallop fishermen.

Sincerely,

Zacharie Stefanski



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

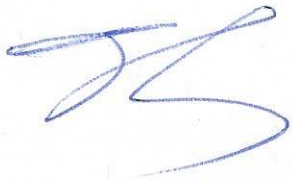
Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery and I do not believe it will be good for the resource. If leasing is implemented, the mortality rate will increase even if the 10/10/20 rule is followed. Our fishery is heading into a time with smaller recruitment levels and fishable scallops available, this will only make it worse. We need to focus on how to decrease the mortality rate and how to foster our fishing grounds so we can continue to have a successful fishery.

Please urge the council to vote no on developing a leasing program. Our resource needs to be protected and fostered before we even consider talking about a program like this.

Sincerely,

Jeremy Storer



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Eden Sylvia and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I am new to this industry, but my family has been in it for generations. From their stories and my current experience, I can say that this is a well-run and well managed fishery. I fear that the proposed change in management will have detrimental effects on the fishery. So many of us rely on this fishery to provide for our families. There could be lease fees, loss of jobs, and loss of generational fishing families if this is implemented.

We fishermen work very hard to provide for our loved ones and we do not want this change. Please urge the Council to vote no on implementing a leasing program.

Sincerely,

Eden Sylvia

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I have been in this industry for four years, but have learned about it for much longer from my father who worked in industry for 37 years. Leasing will reduce our quality of life in a couple of ways, but most visibly in our paychecks. Leasing will bring in some sort of fee that will make its way onto most settlements and directly affect what we are bringing home.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Phong Tieu

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. A leasing program will only cause consolidation, which we know will be no good for the majority of the industry. Consolidation will put the independent and small fleet owners out of business, but will benefit the large fleets. These fleets also typically have their own in house shore support that would eliminate the need for the independently owned shore side businesses. Our local economies depend on the well-being of all stakeholders in the fishery and that requires a fair market that provides opportunities for everyone, not just the wealthy.

Please urge the council to vote no on developing a leasing program. Keep our fishery belonging to the people who make it so great.

Sincerely,

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Fishermen have their own culture that is unique to them. We go out to sea for a few weeks at time harvesting our allocation and braving any weather we encounter. We work longer watches than we have rest time, but this is one part of our way of life that we are accustomed to. If the scallop industry allows for leasing, we will see the end of the generational fishing families and the modern day fishermen. Over the last decade, we have seen an increase of corporate fishing which is no good for our fishery. If leasing is implemented, it will only be a short time before the whole fishery is controlled by corporations that will be able to exert their influence. This will affect the fishermen, shoreside support workers, and local communities that rely on this fishery for survival and it will not be for the better.

Please urge the council to vote no on developing a leasing program. Our fishery and its culture will not benefit from this type of program.

Sincerely,

Frank Travers

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I come from a fishing family that had a hand in both the harvesting and handling phases of this industry. Leasing would destroy the historical fishing families that have made this fishery one of the most successful fisheries in the world. I, like many others, would like my children and their children to be able to experience how unique and extraordinary this fishery is. In order to do that though, we need to preserve the management structure that has allowed us to get to this point. Please urge the council to vote no on developing a leasing program.

Sincerely,

Keith Uzzell

Keith Uzzell

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery and a second generation fisherman. I do not believe a leasing program is needed in the LA fishery. A leasing program will allow for consolidation in the industry, which has been shown to directly affect the fishermen in their pay and job security. Lease fees will most likely be charged or the lay will be changed to offset the lease fees. The one or two boat owners will be forced out of the industry by the large companies and the fishermen on these boats will lose their jobs because the large companies already have their crews. The families and local economies that rely on these incomes will be negatively affected. Leasing is no good for the little guy.

Please urge the council to vote no on developing a leasing program and keep the fishery belonging to the people, not the corporations.

Sincerely,

Alan Meave V

Alan Meave Vazquez

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

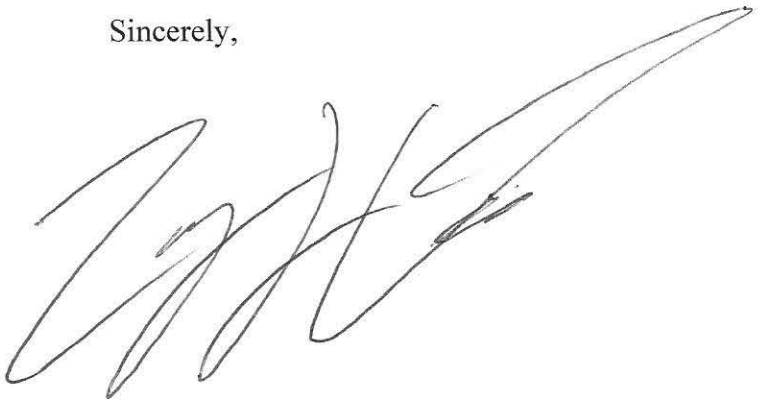
Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely,



ZACHARY VIEIRA

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. If the vessels are allowed to have two allocations on them, when will they have time to do necessary maintenance? Although we have been allocated less trips, it is taking us longer to get a full closed area trip. It concerns me that harvesting the allocated pounds may take priority over giving the vessel down time to make repairs. Our season currently allows for a healthy balance between fishing and non-fishing time that has allowed the vessel owners to keep their vessels up to date and a leasing program may introduce a new time constraint. More time constraints and pressure means less flexibility to schedule repairs. When we are out at sea, we simply want to be safe and do our jobs. This leasing program would jeopardize that.

Please urge the council to vote no on developing a leasing program. It is necessary for vessels to have downtime to be worked on and remain seaworthy.

Sincerely,



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. I think it will either create an unnecessary burden on the fishermen or the independent/small fleet owners. The first scenario is that the fishermen will have to pay lease fees and it will create a financial burden that affects our livelihoods. The second scenario is that the owner absorbs the cost of the lease, but this will also be at the fishermen's detriment. If an independent owner absorbs the lease cost, they will now be that much more disadvantaged in the market. They will have an extra cost that will lead to having less funds to maintain a seaworthy vessel. Depending on what the fishing year looks like, these things combined could put small owners out of business and lead to a large loss in jobs. With these thoughts in mind, please urge the council to vote no on developing a leasing program.

Sincerely,

BRANDON VIEIRA

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman that has also been a captain in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. We as fishermen are constantly told that leasing will be "the only way we'll be able to be a vessel owner." While condescending, it is also a misleading statement. If leasing is allowed, the value of permits will only increase while the actual vessel's price will decrease. If someone works their way up through the ranks and decides to try to become an owner, they will only be able to buy the vessel as it will be impossible to afford a permit. This would limit opportunities for fishermen move up the ladder. Please urge the council to vote no on leasing.

Sincerely,

Paulo Valente

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 12 years. I do not believe a leasing program is needed in the LA fishery. I believe it will lead to consolidation, which will in turn weaken our fishery and the market as a whole. The large, vertically integrated corporations will have more power and resources to lease in more allocation and monopolize the industry.

Another concern would be the mortality increases that may result depending on the type of leasing program allowed. The Council previously found that with DAS leasing, even if the 10/10/20 rule was followed, there would be an uptick in mortality. Do we really want to open ourselves up to a problem like that when recruitment and fishable scallops remain at low levels?

Please urge the council to vote no on developing a leasing program.

Sincerely,

Sergey Yuminov

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a crewman in the limited access fleet of the Atlantic Sea Scallop fishery for the past 12 years. I do not believe a leasing program is needed in the LA fishery. I believe it will lead to consolidation, which will in turn weaken our fishery and the market as a whole. The large, vertically integrated corporations will have more power and resources to lease in more allocation and monopolize the industry.

Another concern would be the mortality increases that may result depending on the type of leasing program allowed. The Council previously found that with DAS leasing, even if the 10/10/20 rule was followed, there would be an uptick in mortality. Do we really want to open ourselves up to a problem like that when recruitment and fishable scallops remain at low levels?

Please urge the council to vote no on developing a leasing program.

Sincerely,

Sergey Yuminov

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Rio Ypon and I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe there is a need in the LA fleet for any type of leasing program. This is just a new way to get consolidation within the industry. We are one of the most successful fisheries in the industry. Our fishery currently benefits all stakeholders; fishermen, owners, buyers, processors, etc. Please do not change the management to allow for leasing. It will lead to a loss of jobs and loss of wages for me and my fellow fishermen.

Please urge the council to vote no on developing a leasing program.

Sincerely,

Rio Ypon



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing would bring unnecessary fees associated with fishing our allocation. With fuel prices rising, we would not be able to afford to go fishing. This could create a disastrous economic situation that would leave lots of fishermen unemployed, which would then trickle down to the shoreside businesses and the local communities that we contribute to.

Please urge the council to vote no on developing a leasing program. Leasing would be horrible for our industry, especially now.

Sincerely,

Tyler Zahn

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. The last time the Council reviewed a program like this, it took up a large portion of the Council's time and nothing ever came to fruition. We are in a period of time with low rates of recruitment and low rates of fishable scallops. We have also seen massive discrepancies in the survey estimates and the scallops we are getting out of each area.

We do not need to be spending our time on an optional program that only would benefit a few. We need to be using our time to figure out how to foster our resource and promote better fishing practices allowing for increases in future DAS and access area allocations. This would benefit everyone from shoreside businesses to fishermen to owners.

Please urge the council to vote no on developing a leasing program. We need to focus on our resource's health because without a healthy resource, there is nothing to be leased.

Sincerely,
Mathew Zable
Matthew Zable

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a crewman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Although we do not have parameters of what this program will contain, we can look at other fisheries that have implemented leasing as a guide of what could come. Other fisheries that allow for leasing have dealt with consolidation, which has caused loss of jobs and wages for the fishermen. We have seen fishermen be charged with lease fees or have had their lay changed. The scallop fishermen work hard for their pay and this would only create an unfair burden on them in the long run.

Please urge the council to vote no on developing a leasing program. The majority of stakeholders in the industry do not want it or need it.

Sincerely,
Luke Zable
Luke Zable

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

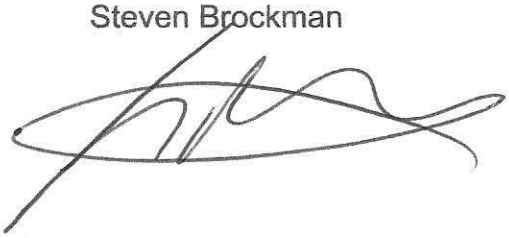
RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a second generation fisherman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. If leasing is permitted, it will consolidate the industry and allow large companies to buy up the industry quicker. When fewer owners exist, the workers will be the first to suffer. Wages will decrease and as a result, our quality of life will decrease as well. Jobs will be lost as the individual boat owner's crews will no longer be needed. The rich will get richer and the little guy will be the one getting the shaft. Please urge the council to vote no on developing a leasing program and keep our fishery as is.

Sincerely,

Steven Brockman



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

The captains and crews of the Atlantic Sea Scallop fishery are the backbone of the fishery. Without us harvesting the scallops, the pieces of paper allowing the boats to harvest the scallops would be useless. Leasing would affect us the most as we would be subject to any sort of fee system without much power to fight back. Leasing will also increase the mortality of the scallop resource. Owners with multiple permits will lease the permits from their less efficient boats to the more efficient ones. Areas are already closing faster than new ones can open up, why would we want to make that problem worse?

Please urge the council to vote no on developing a leasing program. We need the efforts to be focused on finding ways to replenish our resource instead.

Sincerely,

Jacob Cadreux

5/10/22

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been a fisherman in the limited access fleet of the Atlantic Sea Scallop fishery for 25 years. I do not believe a leasing program is needed in the LA fishery. We as fishermen work hard to earn a living and this program would negatively affect our livelihoods. In other fisheries, the crews pay for the lease fees. With rising fuel costs and declining trips, we cannot afford to bear the brunt of the lease fees. Please urge the council to vote no on developing a leasing program. The majority of the stakeholders in this industry do not want it.

Sincerely,

Jose Luis Joni

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

Leasing is not needed or wanted in the LA fleet of the Atlantic Sea Scallop fishery. Our fishery is considered to be the most prosperous/successful and any sort of dramatic change like this could change that. We are currently facing diminishing closed area trips and possibly DAS, what sense does it make to change our management style to one that has proven to increase the mortality of the resource? When stacking came up, the council found that leasing DAS could increase mortality. It makes no sense to adapt leasing as it will only make our current problem even worse.

Please urge the council to vote no on developing a leasing program.

Sincerely,



Nathaniel Cyzoski

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a third generation fisherman currently participating in the limited access fleet of the Atlantic Sea Scallop fishery. I have been a part of this fishery for the past five years and from my experience I can say there is not a need for leasing in our fishery. The fishermen dealing with the grueling conditions will be the ones who suffer at the hands of this style management. Men and women who go out to sea willing to risk their lives will see pay cuts and changed lays while the permit holder will profit off of these labors.

The group lobbying for this change in management has been composed of mostly permit holders. If you ask a fishermen what they want they'll tell you that they want to be rewarded fairly for their work as the current system provides. We do not want our management system to change, we only want more areas to open up for fishing in the upcoming years. We want a healthy resource and to continue on our way of life.

Please urge the council to vote no on developing a leasing program. Keep the industry belonging to the people and not the corporation.

Sincerely,

Daniel Heims

Daniel Heims

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

Innovations are contrary to the established norms and principles of fishing. Most people in this field are accustomed to the established system of renumeration our management provides. If a leasing program is implemented, it will directly affect the fishermen's livelihood. It will also lead to financial loses for the small owners who will need to compete with large fleets that will have more power over the market. If the small guys go out of business, our jobs will be at risk for layoffs as the large companies have their own guys already.

Please urge the council to vote no on developing a leasing program. My fellow fishermen and I in the limited access fleet of the Atlantic Sea Scallop fishery agree that a leasing program is not needed in the LA fishery

Sincerely,

Dmitry Loginov

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My name is Arthur Smith and I am a fisherman in the Atlantic Sea Scallop Limited Access fleet. I have been in a fisherman for 33 years. I have watched firsthand how the resource has dwindled as the industry has become more consolidated. If a leasing amendment is introduced to the fishery, it will cause more consolidation and will be no good for the resource. The resource will be quickly dwindled, leading to unsustainable participation in the fishery which is in violation of National Standard 8 of the Magnuson Stevens Act.

Please urge the council to vote no on the implementation of a leasing amendment in the limited access fleet.

Best,
Arthur Smith



Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am second generation fisherman in the limited access fleet of the Atlantic Sea Scallop fishery. I do not believe a leasing program is needed in the LA fishery. Leasing means less money for less industry members that our whole region will feel the effects of. Leasing leads to consolidation and the fishermen will be the first to pay the price with lease fees. The independent shore support will end up paying when there are no independent boats to work on. Consolidation gives more power to fewer individuals. I watched my father be forced out of a fishery he dedicated his life to by parties that were allowed too much power. I do not want the same thing to happen to many other independent owners in this fishery. Please urge the council to vote no on developing a leasing program.

Sincerely,

Eric Spalt

Eric Spalt

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am currently a second generation fisherman in the limited access fleet of the Atlantic Sea Scallop fishery. My father has been a part of this industry for over 30 years. I believe this type of management would destroy the current structure which allows for generational fishing families. Leasing would make the fishery even more attractive for outside investment firms that will push the industry towards a corporate fishing model. We are a community based fishery, which is supported by the current management structure. This management has worked for us for decades, we should not be trying to change it now. Please urge the council to vote no on developing a leasing program.

Sincerely,

5/10/22

Trevor Vaughan

Mr. Tom Nies, Executive Director
NEFMC
50 Water Str., Mill #2
Newburyport, MA 01950

Dear Mr. Nies,

Leasing will provide much needed operational flexibility in the LA scallop fishery for owners and crew. I support the NEFMC developing a leasing program for the LA scallop fishery, so that we may see what a leasing program would look like. Industry input is critical and once a program is developed, I will have a much better idea as to whether leasing would benefit my operations.

Sincerely,

Name
Address

Jose C Urbina 10 LANG ST LAKEVILLE MA

Dear Executive Director Nies and all other Esteemed Members of the New England Fisheries Management Council,

My name is Ira Miller, I am writing to you to comment on the proposed leasing within the Limited Access (LA) component of the Atlantic Sea Scallop Industry.While I do not participate in this segment of the industry, I am and have been involved in the scallop industry since before there was any distinguishing factors regarding permits. I originally started out holding a General Category Permit like every other permit holder on the East Coast. As we all know the fishery has evolved from that point to what it is now to where we have four different components of the fishery, I currently participate in the Northern Gulf of Maine (NGOM) component of the scallop fishery. Through the years of being involved in this fishery I've learned a few lessons, some the hard way. As we all know many times actions in fishery management may have unintended circumstances which is why I'm commenting on this scoping document. I feel that if it's amenable for the owners and also just as importantly for the captains and crews of these vessels to restructure how they commence their part of the fishery as long as it has no negative effects on the resource, or the ability to regulate and enforce the rules associated with not just their portion of the industry, but also the Limited Access General Category (LAGC), Incidental and the Northern Gulf of Maine components too. Not only that, there also seems to be some concern on how this may impact other fisheries such as Multi-species as well as monkfish permits. As a participant in the NGOM fishery I see the potential loophole for LA boats to lease off their days and then commence to fish in NGOM with just a shell permit and harvest pounds of scallops that were slated to support that component of the fishery which consists of mostly small boats that support many communities up and down the New England coast. The fishery was designed and set aside by the Councils foresight to see that there was great value achieved in doing so and currently it seems to be proving out to be the right decision as it seems to providing opportunities that are having a very positive effect for that portion of the fleet and their communities that depend on the continued success of this component of the fishery. These empty permits were not considered to be potential participants in the NGOM fishery when Amendment 21 was drafted and they definitely should not be considered to impact any part of the fishery if their poundage has been leased off, especially the NGOM portion of the fishery. I believe that many of these boats could have NGOM,Incidental or empty IFQ permits on them that would allow them to access the NGOM fishery. That would be a travesty for the NGOM fishery and its participants. The 2022 NGOM season lasted only about seven weeks this past season with a TAC that was set at the highest it's ever been since they've been setting a TAC for that fishery. The TAC in the NGOM will only go to 800,000# which is only a small increase before the LA boats get 95% of any remaining TAC issued after that while the NGOM portion will only receive 5%.If Ngom ever reaches a TAC of 800,000# it will only mean another couple of weeks of fishing the current exploration rate. I feel strongly that we are tapped out by the current participation rate and cannot afford anymore effort than we currently have. These permits will have already impacted the fishery by leasing out their allocation and then be able to double dip in a fishery that they were never considered to be part of, that option must remain off the table. Please don't allow more boats that were never factored into the equation to participate in other portions of the fisheries, namely the NGOM fishery.Thank you for your time and consideration of my comments on this issue.

Respectfully submitted,
Ira Miller
F/V Julie Ann
Permit# 231459

I'm writing to submit comments on the issue of Limited Access Leasing. When it comes to whether or not you allow LA boats to lease their DAS, for the most part I can't say as it matters much to me either way: I figure they should be able to decide that on their own. But there is one issue that DOES matter to me, and that's what you let them do once they've leased off their DAS.

There are a lot of General Category Permits on LA boats, and when the Council was fixing the management problems in the NGOM and deciding how many pounds the small boats would be able to fish, I don't think anyone figured those permits would ever actually be fished. In the end Amendment 21 allocated the first 800,000 pounds in the NGOM to the small boats the area was created for, and then beyond that, 95% will go to the big boats. But if you end up letting the LA boats lease off their DAS and then fish in the NGOM, you're essentially allowing them to double-dip.

The NGOM was created so the small boats that had traditionally fished the area would be able to do so if and when the resource came back. It was NOT created so big boats could consolidate all their DAS on a few boats and then send the "empty" boats into the NGOM. The NGOM is not a retirement plan for LA vessels.

I hope you'll keep this in mind when you consider whether or not to let LA boats to lease their DAS. For the most part I figure that question should be up to them. But their decision could have a big impact on the NGOM if you don't prohibit them from sending their "empty" boats into the area.

Thank you for your consideration of this important matter.

- Alex Todd
F/V Jacob & Joshua
Permit # ___242848_____

Dear Mr. Nies:

My name is John Tripp, I've been fishing 2 years in the NGOM area. My father in law Tad Miller was one of the fishermen in the group of men that came before you to overcome management issues in the NGOM, I also attended the meeting in Rhode Island. The healthy NGOM fishery has been a blessing for fishermen in my age class from Maine who haven't had the opportunity our fathers had to diversify in fisheries. I have made investments to be able to participate in order to not be reliant on only the lobster fishery. The recent positive management measures in the NGOM scallop fishery have help to alleviate the dependency to rely on a single species to provide the income to support my family. I write to oppose allowing leasing of quota which runs the risk of counteracting all of the gains that have been made to make the NGOM area a healthy and sustainable fishing ground.

I stand with the fishermen who oppose leasing quota, as with many changes that occur in fisheries management there are always loopholes, and without being sure these loopholes get closed the problems allowing leasing will create will be significant for the NGOM fishery.

From what I understand the potential for the effort applied in the NGOM will be more the double what it was last year if Gen Cat boats can lease their quota off to other vessels and then move to fish in the NGOM area. The productive areas in that fishery are very small and the positive effects of the recent management efforts would most certainly be negated by the increase in effort allowing fleet fisheries to consolidate quota and then send the boats off to fish NGOM.

Thank you

John Tripp
F/V SkyAnnIra
Permit 251896

Dear Mr. Nies:

I'm writing to ask that you make sure you consider the Northern Gulf of Maine (NGOM) when you look into whether or not to allow LA boats to lease their DAS.

When you divided the NGOM between the small boats it was created for and the bigger boats that had traditionally fished elsewhere, I don't think anyone thought about those big boats consolidating all their DAS and then sending their "inactive" boats into the NGOM to fish for bonus pounds. There are a lot of Gen Cat permits on LA boats. I'm pretty sure most people figured those (mostly incidental) permits were essentially out of commission. Well, if you let the big boats lease their DAS, those permits could be turned into NGOM permits and could add a whole new level of activity in the NGOM. I'm one of the people who opposed a Control Date a few years ago because I thought the NGOM could accommodate more than the 40 or so boats that had fished there. But there's a limit, and I certainly don't think anyone believes the NGOM should be the place where old boats go when they've leased out all their allocation that can be fished elsewhere.

I think the question of whether or not the big boats can lease their DAS should be left up to them. But when it comes to the NGOM, I think we should all remember why the area was created. If you let the LA fleet lease their DAS and consolidate, then you should make sure you put something in place to prevent them from fishing their Gen Cat permits in the NGOM.

Thank you

James West
F/V First Impression
NGOM Permit #151983

Thomas Nies
New England Fishery Management Council
comments@nefmc.org
July 2, 2022

Dear Mr. Nies:

I'm writing to make sure you realize that allowing Limited Access vessels to lease their DAS could have a big impact on the Northern Gulf of Maine.

I was one of the many fishermen who came before you between 2014 and 2021 to ask you to correct management problems in the NGOM. I'm glad those problems were finally corrected, and now I want to make sure we don't have a whole new slew of problems.

When Amendment 21 was developed there were lots of documents circulated showing the number of Gen Cat permits capable of fishing in the NGOM. Many of these Gen Cat permits were on vessels that also had LA permits, so folks figured these were out of circulation. This assumption was part of why the small boats in Northern New England for which the NGOM was created were allocated only the first 800,000 pounds, and after that 95% would go to the LA fleet. Well, if you allow LA boats to lease their days, those Gen Cat permits we assumed were out of circulation will be anything but. From what I understand there are almost 200 Gen Cat permits on LA boats. The consolidation that always happens when you allow leasing will yield a whole lot of big boats looking for a place to go to work. And with scallop prices where they are right now and are likely to be for at least a few more years, I'm guessing a lot of them will choose to come into the NGOM. After all, right now you can turn an incidental or IFQ permit into an NGOM permit and fish 200 pounds a day.

If you allow this to happen, you're going to be adding a whole new slew of boats into the NGOM. The NGOM was created so that small to mid-size boats that had traditionally fished the Gulf of Maine could continue to do so if and when it recovered. It was NOT created so LA boats could lease off their DAS and then come into the area to collect bonus pounds above and beyond the DAS they'd been given.

I hope you'll keep this in mind as you decide whether or not to allow leasing of DAS, and I hope that if you do allow leasing, you'll put something in place to make sure once a boat has leased its DAS, it's prohibited from fishing in the NGOM.

Thank you

Jim Wotton
F/V Overkill
Permit # 151564

Seafreeze Ltd.

100 Davisville Pier
North Kingstown, R.I. 02852 U.S.A.
Tel: (401)295-2585

June 17, 2022

Tom Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

Attn: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

We are writing to express our opposition to the proposed scallop leasing program and to request that the Council suspend any future work on this amendment.

Seafreeze owns and operates several vessels and two shoreside facilities. We do not possess Atlantic sea scallop permits; our business consists of primarily squid, mackerel, butterfish and herring harvest and processing. The illex squid and loligo squid fisheries are our most important sources of product and revenue. Loss of opportunity in either of these fisheries due to an influx of new effort would have devastating effects on our business. Our ever-increasing investments in these fisheries, our vessels, and our facilities would be devalued if our access to quota were curtailed by new entrants using previously latent permits.

The simple fact is that "when scallop landings/days fished decrease, activity in other fisheries increases". This is clearly spelled out in the staff scoping presentation, slide number 8. The example given of "2015 and 2016- scallop landings drop, roughly half of total days spent in other fisheries" on that same slide tells the Council everything it needs to know about effort shifts. If there were no scallop landings for a particular vessel due to leasing of quota, the chances of that vessel participating exclusively in other fisheries is high. Vessels and eligible permits for lucrative fisheries will not sit idle.

The squid fisheries are already fully capitalized with the existing number of active vessels. In the case of illex, the fishery is overcapitalized with the existing number of active vessels and has experienced early closures for five years in a row, from 2017-2021, with the quota being reached in record time. The longfin squid fishery has experienced early closures in various years over time, including the Trimester 2 summer fishery, which is when most scallop vessels are actively scalloping. Should scallop vessels lease quota and become inactive in the scallop fishery, it is very likely that many of the 97 squid/mackerel/butterfish permits currently held by limited access scallop vessels (see slide 7 of the staff scoping presentation) would become active in these two squid fisheries, which could result in early closures and loss of access for historic participants.

Therefore, we request the New England Council suspend any further work on this amendment. Thank you for the opportunity to comment.

Sincerely,

Meghan Lapp, Fisheries Liaison
Seafreeze Shoreside, Seafreeze Ltd.

-----Original Message-----
From: James Sjolund <sjolund@comcast.net>
Sent: Friday, May 27, 2022 12:29 PM
To: comments <comments@nefmc.org>
Subject: Scallop leasing

I am a third generation fisherman from Nantucket Island I am a currently a captain of a longlineliner in Alaska. Almost everything is now owned by big companies, boats, quota gear etc. Individuals can never get in as owners, it is sad to see there is no next step, from running a boat to owning your own. Scallop leasing will eventually end up with the same outcome if leasing is allowed. I do think some changes could be made to allow trips to be more efficient like rolling over quota from one year to the next so there isn't a partial trip. There are many ways to do it but the community's and business will suffer from leasing.

Jim Sjolund

Sent from my iPhone

Allen Steel Co.
202 High Street
Leesburg, NJ 08237

Tom Nies, Executive Director
New England Fisheries Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Scoping for Limited Access Scallop Leasing

Dear Council Members,

Allen Steel Company services commercial fishing vessels including scallop vessels from up and down the east coast.

We believe that a leasing program should be developed for the limited access scallop fleet.

We repair vessels that have reached or are reaching their life span. These vessels are not worth rebuilding and are seeing untimely issues that are unpredictable due to age. These issues are causing emergency haul outs to make bottom repairs and the like that were primarily unseen. This is a safety issue that could be remedied by the fleet having flexibility in trading quota for the vessels to work more during the year.

It does not make sense for a vessel to only work a very small portion of the year when there could be a leasing/trading program put together that will allow vessels to work longer for the year and remove safety risks from the industry. Our business could see positive impacts if vessel owners can financially increase capital expenditures on the newer vessels they would keep.

Any program that is developed should be designed in such a way that the resource is protected from dramatic changes in the way scallops are harvested currently, thereby not big changes in the way the fishery is governed. The design should concentrate on protecting the community during decreasing allocations as well as safety and risk reduction.

Thank you for considering a leasing program that will sustain the community shoreside support for the scallop industry as we feel without some type of flexibility to adapt to changing times, the industry may be in peril.

Sincerely,

James R. Allen III

Jim Allen
Allen Steel Co. Inc.

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I have been working as an electrician on the Fairhaven/New Bedford waterfront for my whole life. About 22 years ago I decided that I wanted to work for myself and a few years after that I incorporated my own company, Shoreside Marine Electrical Services Inc. My shoreside support business specializing in electrical repairs currently services the Limited Access fleet of the Atlantic Sea Scallop fishery as well as a few groundfish vessels. When I first started my company I had work from 17 groundfish vessels, but due to consolidation in their fishery I now only have three vessels to work on. If the scallop fishery implements leasing, we will see the same sort of consolidation occur. The Fairhaven/New Bedford waterfront is proof that this fishery is well managed and promotes the success of all stakeholders, not just the select few large fleet owners. There is no need or logical reason to change the current management system of "one boat, one permit." Please urge the council to vote no on developing a leasing program.

Sincerely,

Michael Amarante
Shoreside Marine Electrical Services Inc.

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street Mill#2
Newburyport, MA 01950

July 1, 2022

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Director Nies:

I write this letter to you in support of the LA scallop fishery leasing program. I weigh in on this specifically from the shoreside repair end. I am a manager at Dockside Repairs in New Bedford MA, where our primary customers are a fleet of LA scallop vessels. We are tasked with maintaining and repairing these vessels year-round to keep them in seaworthy condition. With that being said I see the leasing program as a positive for the industry for several reasons.

If this program where to where to come to life I believe it would impact the fleet in a positive way. with two permits being placed on to one vessel it would lead to more space in this harbor which is clearly filled to the max. it would allow owners to focus efforts on there better half of boats. Of those better half of vessels would be the more efficient ones producing less emission pollution. It would allow owners to move on from some vessels that have aged beyond a safe and seaworthy. Possibly giving them the opportunity to make upgrades or maybe even look at building new construction. It's hard to look at an owner an expect them to put out millions of dollars in a new build to just watch it sit tied idle to the dock. The current conditions LA scallop permit holders are forced to have that un necessary vessel to fish 60 days' worth of allocation. With some of these older vessels removed from the fleet it would decrease the chance of fuel and oil spill spills. There is no need to fill our docks with this amount of steel year-round with today's current LA scallop allocation.

As a shoreside repair facility in New Bedford, if this program where to pass I do not see it hurting my business at all. The vessel has to leave the dock to break. If that winch is not turning or the lights and electric motors are not tuning on and off, if that pump isn't pumping or that engine is not running it will not wear out and break. Putting two permits on one vessel will not change the amount of maintenance required to harvest the given allocation. That dredge the welder fabricated spends the same amount of time on the bottom fishing. That mechanic turns his wrench just as much only difference now it's on

one vessel and not two. because that engine still puts the same number of hours on and that dredge spends the same amount of time on the bottom fishing too catch its allocation.

I can only see positive things to come from this leasing program. I am in support of the development of a leasing program for the LA scallop fishery. I believe industry input is very important to this development. With the major confusion of what the ask is and what the rumors are. The leasing program will not change the ownership cap, the permits being leased would have to be of like wise size. The leasing program would also not have any affect on the allocation allowed to be harvested. At the end of the day, I cannot see any negatives for shoreside repair facilities. Only the much-needed space to operate our current business with opportunity to bring in new vessels that we currently have to turn away because we fill our dock with idle LA scallop vessels that will only spend maybe 60 days offshore to catch its allocated allocation.

Kyle Anthony

Manager

Dockside Repairs Inc.,

July 1, 2022

Dear Mr. Nies,

I am writing in support of developing an amendment to address leasing in the Limited Access scallop fleet. By allowing NEFMC to develop a leasing program, we will be able to see what it would look like and have a better idea of all of the benefits.

As an employee of a service -related industry, a large topic discussed by the proponents is lack of work if leasing occurs. Besides the opportunity for work on the remaining vessels in the Limited Access fleet, there will be opportunities on other fishing boats as well as in the Wind industry.

As it stands today boats are tied to the dock for over 250 days. By allowing leasing and putting two permits on one vessel, there will still be plenty of time to do any repairs needed. Another benefit is fuel. The crew pays for the fuel and boats tied to the dock burn a lot of wasted fuel. There isn't always an opportunity to use shore power. The fuel savings for the crews would be substantial.

All of the fishermen I have spoken to understand and agree with the benefits of a leasing program. Not having to switch boats between trips will enable them to spend more time on shore and more time with their families.

Leasing will allow more flexibility for both owners and crews.

I look forward to seeing the development of this amendment.

Sincerely,

Mark Buron, CFO

Dockside Repairs, Inc

New Bedford, MA 02740

Chairman Eric Reid
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

RECEIVED
JAN 10 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

Dear Mr. Reid,

I am an owner of a shoreside business supporting the limited access (LA) fleet of the Atlantic Sea Scallop fishery. I would like to voice my opposition to the development of an amendment for leasing within this fishery. This particular fishery has remained one of the most prosperous fisheries in the world, mostly due to the current management structure. Changing the management of this fishery could not only harm independent owners, but also the shore support industry that rely on them. Most limited access permit holders in favor of leasing own vertically integrated companies and are primarily self-sufficient and have little necessity for outside shore support businesses.

My small business currently employs individuals whose families' livelihoods rely upon my success. We believe that the council's time would be more productive and beneficial for *all* stakeholders in addressing other issues plaguing the fishery such as low recruitment and declining biomass.

Thank you for allowing us to be heard on matters that impact us and our families.

Sincerely,

Cape Fish & Lobster

3-2-22

I Do Not want Stacking and Leasing

John Iversen

Shore Engineer

Dorchester Shipyard, Inc.

"Serving the Fleet"

Tom Nies, Executive Director
New England Fisheries Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Public Comments on Scoping for Limited Access Scallop Fleet Leasing

Dear Council Members,

Dorchester Shipyard Inc. is a full-service shipyard in Dorchester, NJ for all types of commercial vessels. We service scallop vessels from Massachusetts down to North Carolina.

We are in favor of the development of a leasing program for the limited access scallop fleet.

We re-build and repair scallop vessels of all age ranges and are seeing that some of the scallop vessels are reaching the end of their life span. This, despite good regular shoreside and shipyard maintenance programs having been applied.

A leasing program, that maintains current sustainability standards in the resource, will only enhance the safety and age of the overall fleet. With growing costs and decreasing revenue to the owners, less capital will be spent on these older vessels. This increases risks of sinkings, mechanical failures and environmental spillage that are difficult to anticipate as vessel reach certain ages.

We see the impacts to be neutral to our business operations when eliminating older vessels from the fleet. Likely positive effects will take place, (1) owners will be able to economically put capital into major overhauls in retained vessels, (2) owners will haul vessels more often to inspect below the waterline (reducing unknown risks). These two factors alone will at least maintain, but more likely create jobs for skilled welders, mechanics as well as general labor.

There is currently not enough shipyard capacity on the eastern seaboard for scallop quota leasing to have a negative impact on our business.

We appreciate your consideration in the development of a leasing program.

Best Regards,



John Kelleher
President
Dorchester Shipyard Inc

13 FRONT STREET, DORCHESTER, NJ 08316
T (856) 785 8040 Email danp@dorchestershipyard.com

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My family business, started by my father, has been working on the New Bedford waterfront for decades. We do a lot of work on vessels participating in the (LA) fleet of the Atlantic Sea Scallop fishery. If a leasing program was implemented in this fishery, it would have negative effects on our business. If you look to the other fisheries that have implemented leasing, you would see that this style management would not be beneficial for all stakeholders involved in the industry. Leasing would only allow consolidation in the long run, which would put independent and small fleet owners out of business. Without these owners, there would be no need for independent shoreside businesses as the large fleets have their own in house support.

Please urge the Council to vote no on this proposal.

Sincerely,

Alex Oliveira

OLIVEIRA PAINTING & SONS

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am a part of a family owned and operated shoreside business supporting the limited access (LA) fleet of the Atlantic Sea Scallop fishery. Our business will be directly affected by a leasing program within this fishery. This type of management has been proved to result in consolidation in other fisheries, which eliminates the need for independent businesses. The larger corporations already have their own in house welders, painters, etc. and will have no need to hire other businesses. This fishery is currently healthy and alive with its current management, there is no need to change it.

Please urge the Council to vote no on this proposal.

Sincerely,

Cliff Oliveira

OLIVEIRA PAINTING & SONS

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

I am an owner of a shoreside business supporting the limited access (LA) fleet of the Atlantic Sea Scallop fishery. I would like to voice my opposition to the development of an amendment for a leasing program within this fishery. This fishery does not need this sort of program. It has remained one of the most prosperous fisheries in the world, mostly due to the current management structure. Changing the management of this fishery could not only harm independent owners, but also the shore support industry that rely on them. Most limited access permit holders in favor of leasing own vertically integrated companies and are primarily self-sufficient and have little necessity for outside shore support businesses.

Please urge the Council members to vote no on this proposal. Thank you for allowing us to be heard on matters that impact us and our families.

Sincerely,

Joe Oliveira

OLIVEIRA PAINTING & SONS

Allen Insurance | Financial
NAVIGATING LIFE'S RISKS & REWARDS

34 Elm Street, P.O. Box 578
Camden, ME 04843

94 High Street
Belfast, ME 04915

339 Main Street
Southwest Harbor, ME 04679

31 Chestnut Street
Camden, ME 04843

22 School Street
Rockland, ME 04841

47 Main Street
Waterville, ME 04901

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street Mill#2
Newburyport, MA 01950

June 30, 2022

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Director Nies:

This is a letter in support of both a temporary and permanent leasing program with a particular focus on its impact on industry safety – the health, safety and well-being of vessel crew members.

For more than 15 years I have had the pleasure of securing insurance coverage for a significant number of scallop vessels based in New Bedford.

Given the hazardous nature of being a crew member onboard a scallop vessel, any change in regulation that reduces the risk of injury or death should be supported. Under the current regulations, the vast majority of the vessels in the scallop fishery are tied up approximately 300 days a year. The underutilization of these vessels is costly and wasteful and provides its own unique set of risk management challenges, some of which can begin to be alleviated with this proposed change.

Under the proposed leasing program, a vessel owner leasing a permit would have the ability to fish twice as many DAS and access area trips while operating just one vessel. The proposed leasing program would be particularly beneficial to the many individual vessel owners (as well as corporations) who own more than one vessel. Permit leasing from one owned vessel to another could result in a significant savings; an owner could choose to maintain one vessel, rather than two.

The obvious benefit of not having unnecessary maintenance costs of two vessels would afford vessel owners the ability to provide a much higher level of quality of maintenance, as well as possibly help fund new vessel replacement in an aging fleet. It is my experience that better maintained vessels and new vessels provide for a much safer work platform.

Insurance claims history reveals numerous injuries arising from the transfer of gear from one vessel to another. Under the proposed leasing program, there would be no need to transfer gear from one vessel to another which will reduce unnecessary risk of injury. By eliminating this work, you mitigate a significant safety risk because less work transferring gear at the dock translates to fewer injuries.

Another benefit of the leasing program is the positive impact on the environment. Newer and better maintained vessels are much more fuel efficient, while older vessels pose a greater likelihood of pollution incidents. From my own personal experience, I can attest to the cost of pollution issues on older scallop vessels. These claims can be sizeable.

In summary, any change the New England Fishery Management Council undertakes to protect the scallop fishery should also work to protect the safety and wellbeing of the men and women who harvest the resource. This leasing proposal can help do that.

Thank you for this opportunity to provide these comments.

Sincerely,

Peter Williams

Peter Wiliams
Vice President
Allen Insurance and Financial

Thomas A Nies, Executive Director,
New England Fishery Management Council
50 Water St, Mill 2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Mr. Nies,

My husband is a commercial scallop fisherman. For years my husband has warned about this consolidation/ leasing plan that could be detrimental to our livelihoods and many families just like ours. I urge you to please urge the council to vote against developing a leasing program.

Victoria Mello

Victoria Mello

RECEIVED AT
APRIL 27, 2022
GLOUCESTER MEETING.
JMP

SCALLOPERS CAMPAIGN
FLEXIBILITY · SAFETY · FAIRNESS

Staying On Course: What We Stand For in the Scoping Process

April 27, 2022

The New England Fishery Management Council (Council) has initiated scoping meetings to ask the Limited Access (LA) scallop fleet whether it supports leasing and what a leasing program should include. They have not provided any information or details regarding what a voluntary leasing program in the LA scallop fishery would include. In fact, they are asking for input this year on that very question.

Unfortunately, there is a possibility that people could misinterpret or even misuse the scoping criteria and scheduled meetings as a chance to critique a leasing program that does not actually exist. That is not what the Scallop Advisory Panel (AP), Scallop Committee or Council intended when it approved scoping as a priority for this year, and it is not what the scoping document covers.

The Scallopers Campaign and our supporters want you to know what we stand for with absolute clarity. We have put forth a number of principles to explain more fully our vision of a fair and effective leasing program. While the leasing program in the General Category scallop fleet provides a general framework, there are other considerations, and we want you to know where we stand.

- **Conservation Neutrality:** A leasing program in the LA scallop fishery should maintain the same number of fishing trips and the same number of pounds landed, just on fewer boats. Leasing should not be used to increase the harvest level or change fishing behavior in the LA scallop fishery. Smaller vessels should not be allowed to lease to larger vessels; leasing should be limited to similar or smaller vessels.

- **No Harm to Other Fisheries:** Understanding that some LA scallop permit holders also hold permits in other fisheries, a successful leasing program will ensure that leasing does not allow for additional fishing effort in other fisheries.

- **No Harm to Other Scallop Fisheries:** Under a voluntary program, owners will have the choice about whether to lease or not. Leasing in the LA scallop fishery should not disadvantage other scallop sectors. Owners that lease should not be able to increase effort in the NGOM scallop fishery or in the general category with any affected vessels.

- **Ownership & Control Caps:** Leasing cannot be used to get around the current 5% ownership and control cap. No owner currently at the cap should be allowed to own or control more than 5% (of permits and vessel allocations) through leasing. The 5% cap applies across the board to maintain the integrity of the ownership cap.

- **Maximum of Two Allocations:** The Scallopers Campaign has advocated for limiting leasing to a maximum of two full allocations per vessel. Since the majority of crew members work on two vessels, due to the current limited fishing opportunities, limiting leasing to two full allocations per vessel will minimize crew disruptions and provide them with safer, more stable work.

- **No Mix and Match:** By maintaining the individual identity of each permit, mixing leased days with allocated days will not be allowed. Vessels should only be allowed to fish under one permit at a time, meaning that fishing behavior and length of trips will not change.

The Scallopers Campaign is confident that if given the opportunity, the AP and Scallop Committee can develop a fair and effective voluntary leasing program in the LA scallop fishery. Supporting the development of a leasing program is only the first step. After the development of a leasing program, the industry and the Council will be much better informed to make a judgement as to whether to approve and proceed with leasing.

LEASING IN THE LA SCALLOP FISHERY =

LOWER COSTS + MORE SAFETY + HIGHER CREW PAY

The New England Fishery Management Council is taking a hard look at a leasing option in the limited access (LA) scallop fishery to provide industry with more flexibility. **It's a good idea – and it's the right time.**

Q. What is "leasing"?

A. Voluntary permit leasing creates flexibility by providing the option to move scallop fishing from one vessel to another, without changing ownership and without making the change permanent.

Q. When does leasing make sense?

A. Here are just a few, routine cases where it makes sense to move fishing from one vessel to another to avoid losing the trip and the income:

1) **A vessel breaks down:** Right now, if a boat can't go (especially late in the season), the trip might be lost – and no one earns any money.
2) **A captain can't make the trip:** Right now, if a captain gets sick or something else keeps them off the water, the trip can also be lost – and no one earns any money.
3) **A small operator has two part-time permits:** Right now, small operators have to maintain two boats to fish two partial shares, even if they don't make up a full share.
4) **An operation has too many older boats:** Right now, owners of multiple boats can't reduce the size of their fleet, no matter how old some of their boats are.

Q. How would leasing help?

A. Flexibility! Leasing gives scallop operators an option to make sure that they can fish **all** their trips **every** season, regardless of any unexpected problems that pop up, something they lack under the one boat-one share system.

Q. What are the big picture benefits of leasing?

A. Here are a few of the top payoffs if leasing is an option in the LA fishery:

1) **Improves Safety:** Leasing allows for the possibility of newer and fewer boats for crew, making it a safer option for everybody.
2) **Lowers Costs:** By using fewer and newer boats, the costs for fuel go down – making more money available for crew.
3) **Guarantees Trips:** By having a back-up plan, there will be fewer times when trips are lost because the boat or captain are unavailable
4) **Cuts Pollution:** Fewer boats on the dock will save millions of gallons of fuel and cut CO2 emissions for everyone

the SCALLOPERS CAMPAIGN
FLEXIBILITY · SAFETY · FAIRNESS

WE CAN DO THIS!

Back in 2019, the Scallopers Campaign developed a set of principles that addresses most concerns regarding a leasing program, while still delivering great benefits. We offer these as a starting point to develop a program that works for all Atlantic fisheries.

In our view, the leasing program should:

- Promote flexibility and fairness for the benefit of the sea scallop fleet;
- Improve the economic performance and resiliency of the fishery;
- Improve crew safety in the scallop fishery;
- Ensure conservation neutrality;
- Maintain the individual identity of each LA scallop permit;
- Include a commitment and measures to ensure "No Harm" to non-participating scallop vessels;
- Recognize and address the diversity and characteristics of the LA scallop fleet, including multi-fishery vessels;
- Include a commitment and measures (for example, sideboards) to protect other fisheries from negative impacts of any approved program;
- Reflect and include the existing caps on ownership and control; and
- Limit the amount of leasing to a maximum of one additional full allocation per vessel, so that no vessel may fish more than two allocations.

It's a Proven Model:

Leasing already works in the GC scallop fishery and in dozens of fisheries across the USA. Crews in these fisheries know they make **more money** when there are **lower costs** and **more options** to fish **all authorized trips.**

The Bottom Line:

The Council has a good approach: Let's do our due diligence and build a leasing program that delivers benefits to us all and protects other fisheries. Then let's try it out next year. **Speak up now to make sure a few loud voices don't muddy the waters.**

The Scallopers Campaign... working to bring flexibility, safety, and fairness to the Atlantic sea scallop fishery.

Learn more and sign up for updates at www.scalloperscampaign.org.

The SCALLOPERS CAMPAIGN
FLEXIBILITY · SAFETY · FAIRNESS

RECEIVED
JUL 05 2022
NEW ENGLAND FISHERY
MANAGEMENT COUNCIL

WE ARE PROUD OF
FISHERMEN
123 APPLE RD.
UNITED NATIONAL FISHERMEN'S ASSOC.
919-473-3287
N.C. 27953
MANNS
HARBOR,

ATTENTION: ATLANTIC SEA SCALLOP LIMITED ACCESS LEASING SCOPING!

C/O Thomas Niles Director
NEFMC
50 Water Street Mill # 2
Newburyport MA. 01950

Dear Sir,

UNITED National Fisherman's Association is 100% in favor of leasing for the " LIMITED ACCESS SCALLOP FISHING PORTION OF SEA SCALLOPS PLAN!

Council allowed the General Category to lease & transfer sea scallop Quota; thus Under Magnuson the Council should allow the Limited Access the same privileges.
16 U.S.C. 1851
M-S Act 301 (4) Conservation and Management measures shall not discriminate between residents of different States. ETC.
It is the Associations belief that leasing by all sectors is required under Magnuson.

By dollars the Sea Scallop industry is the leading dollar fishery for the East Coast.

THE SEA SCALLOP FISHERY IS NOT BEING MANAGED FOR THE MOST ECONOMIC VALUE TO NATION.!

Hopefully Leasing for the Limited Access vessels will allow better utilization of the resource.

Council could consult "Yamaha Fishery Journal # 34
As a method to correctly manage the entire SEA SCALLOP FISHERY!
Council should / COULD ask science to consult
"Shumway" DEVELOPMENTS IN AQUACULTURE AND FISHERIES SCIENCE, VOLUME 21 SCALLOP : BIOLOGY ECOLOGY AND AQUACULTIRE TO ENHANCE THE VALUE OF VESSEL LEASING TO THE UNITED STATES!
Protection of "small Sea Scallops " if leasing were allowed could require removing star fish by vessels utilizing leasing for general Category & Limited access.
As stated above UNFA is 100% in favor of leasing!

James Fletcher

James Fletcher Director
6/272022

THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

May 6, 2022

The Honorable Charles Baker, Governor
State House – Room 280
Boston, MA 02133

Re: Scallop Fishery Leasing Proposals

Dear Governor Baker:

We are writing to you as a group of New Bedford area state legislators regarding the vibrant and successful scallop fishery based in the Port of New Bedford.

As you know, the federal New England Fishery Management Council is currently engaged in a preliminary 'listening tour' on whether to advance a regulatory proposal called "leasing" which has the potential to dramatically change the future of the Massachusetts scallop industry in ways we think are detrimental to the fishery and the SouthCoast. As described briefly below, we urge you to use caution through the participation of the Commonwealth's designated member of the federal fishery council (a designee participates from the Division of Marine Fisheries). While the listening tour is occurring right now with upcoming public sessions in New Bedford, there will likely be a full Fishery Management Council vote this fall as to whether to advance the idea of permit leasing to the full blown 'amendment process'.

Permit leasing is a potential practice where scallop boats, rather than go out to sea to fish, would lease out their fishing days to another vessel for use at sea. The businesses known to push this idea tend to be vertically integrated (often with ownership outside of Massachusetts) within the fishing industry; these business groups tend to own the vessels, the shoreside docking facilities and also own the processing businesses who then market seafood for sale. Those businesses are quite different from that portion of the New Bedford based scallop fleet

which consists of local family businesses, whether engaged directly in fishing or support areas like supplying gear, welding, repairs, provisions, etc.

We do not think that pushing the leasing proposal to the 'amendment process' is in the state's or the fishery's best interest while other critical issues important to the scallop industry are in need of Management Council attention. The Management Council is already in need of using its limited time and staff resources on the questions of protecting small scallops, promoting scallop recruitment in the mid-Atlantic, and reducing flatfish bycatch. Licensing would only, in our view, be a distraction from the needed work of the Council on these direct ocean-based issues affecting the size of the harvest and the health of the Atlantic Scallop biomass.

In addition, the Council should be focusing on the reopening of the prime fishing area known as the Northern Edge; this is a must in our view as it will open prime areas for commercial access to scalloping and bring certain economic benefit to our port in the tens of millions of dollars. These fishery issues (as opposed to leasing) will benefit ALL those who participate in the scallop fishery, while 'leasing' is of limited benefit to some, and a threat to the future of the smaller independent fleet which also involves a way of life and supports hundreds of families on the SouthCoast.

Specifically, 'leasing' proposals, which have come up for consideration and been rejected over many years by the Management Council, would change the way the fishery functions, and likely concentrate ownership in a few corporate and investor entities by allowing the grouping of individual fishing permits so that one vessel could fish in the name of many permits. In the end, we believe the result of this dramatic change in the shore-side fishery, will leave our port less diverse, with fewer participants; that would mean fewer participants not only in the boats and crews themselves, but in the many support businesses of maintenance, supply and repair which are the hallmark of the Port of New Bedford. Our port attracts vessels and their business activities to Massachusetts from Maine all the way south to North Carolina because there are so many independent support businesses available in the harbor.

Make no mistake, this is the kind of change in practice akin to the so-called 'sector management' plans adopted in New England a decade ago. It is now generally acknowledged that sector management reduced the groundfish fleet in our port to a few owners who regrettably used their essential control over the fishery to manipulate prices and reduce that fleet to a fraction of what it had been. Because such changes cannot be reversed once ownership and businesses change, this is not the kind of issue which can be 'tried out' to see how it works. Failure here, would mean a permanent change in our port, which as you know, has remained the Number One fishing port in the country for many years.

Our successful scallop fishery in New Bedford is no accident. Careful management has resulted in a healthy fishery and biomass supporting thousands and bringing several hundred million dollars to the local and state economy every year. A risky change in practice, on behalf of only some in the fleet, is not in the broader interest which we look to you for support.

Thank you for your consideration.

William M. Straus
State Representative
Mattapoisett -10th Bristol

Paul Schmid
State Representative
Westport – 8th Bristol

Christopher Hendricks
State Representative
New Bedford – 11th Bristol

Antonio F. Cabral
State Representative
New Bedford – 13th Bristol

Christopher Markey
State Representative
Dartmouth – 9th Bristol

City of New Bedford
MASSACHUSETTS

OFFICE OF THE CITY CLERK
133 WILLIAM STREET
NEW BEDFORD, MA 02740-6182
Tel: 508-979-1450 • Fax: 508-991-6225

DENNIS W. FARIAS
CITY CLERK

STEPHANIE MACOMBER
ASSISTANT CITY CLERK

SUSAN M. HENRIQUES
ASSISTANT COUNCIL CLERK

RECEIVED
JUN 15 2022
NEW ENGLAND FISHERY MANAGEMENT COUNCIL

June 13, 2022

Eric Reid, Chair
Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, #2
Newburyport, MA 01950

Dear Gentlemen:

I am writing to inform you that at a meeting held on June 9, 2022, the New Bedford City Council unanimously Adopted a Written Motion sponsored by Councillor Pereira, Morad, Gomes, Giesta, Carney and Baptiste, *"Requesting, that the City Council go on record in opposition to the New England Fishery Management Council's scoping inquiry for a Limited Access Leasing Amendment for the Atlantic Sea Scallop Fishery Management Plan."*

As such, the Council respectfully requests your support and assistance in their efforts to bring about a positive resolution to this important matter. It is on their behalf that I thank you for your time and attention. Please feel free to contact me directly should you or your office require additional information.

With kind regards,

Dennis W. Farias
City Clerk/Clerk of the City Council

cc: Ryan J. Pereira, Councillor Ward Six
Linda M. Morad, Councillor at Large
Brian K. Gomes, Councillor at Large
Maria E. Giesta, Councillor Ward Two
Naomi R.A. Carney, Councillor at Large
Derek Baptiste, Councillor Ward Four
File

CITY OF NEW BEDFORD
JONATHAN F. MITCHELL, MAYOR

May 24, 2022

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing

Dear Director Nies:

I write to provide comments regarding Atlantic Scallop Limited Access Leasing in conjunction with the scoping sessions being conducted by the New England Fisheries Management Council in New Bedford.

The Council's decision-making in this matter could not be more potentially consequential to the Port of New Bedford, as the scallop-related enterprises within the Port are performing well within the existing regulatory structures, and scallop-related enterprises (both vessels and shoreside operations) account for the overwhelming share of the Port's landed value and economic output. It is therefore imperative that the past and present success of the industry is weighed carefully by the Council before any consideration is given to changing the management policies which have been so integral to the Port's and the scallop industry's success.

As you know, the Port of New Bedford is the most valuable commercial fishing port in the United States. This success, again, is due in large part to the profitability of the scallop industry. The Port is home to roughly 7,000 workers and 400+ fishing vessels. Its complexity and scale are unparalleled on the U.S. East. Local shoreside businesses thrive from providing support services to the fleet, and the port continues modernize its operations and infrastructure. Our goal is to maintain New Bedford's overwhelming leadership position and maximize the Port's potential as an economic engine for the state and region.

It is with this in mind that I encourage the Council to focus its attention on reforms that have the most potential to deliver broad, tangible, quantifiable benefits across the commercial fishing industry, and refrain from an investment of the Council's time and resources on proposals with uncertain impacts and potential benefits likely to accrue to narrow interests. The policy changes which would allow for Atlantic Scallop Liming Access Leasing is one such concept that should warrant deep skepticism from the Council--as how it will affect, over the long-run, each owner, crew, and port stakeholder is essential unknowable.

On the other hand, we do know that the current performance of the fishing industry, especially the scallop-related enterprises, rests on a solid management foundation—not perfect in all respects, but solid nonetheless. The scale and profile of the scallop industry has come to helped shape and define the Port of New Bedford, and has supported consistent growth along the waterfront and delivered positive economic and social benefits extending far beyond the docks.

New Bedford is the full-service port that it is today--with a robust array of warehouses, ice houses, shipyards, engineering firms, workboats, pilots, mechanics, brokerages, insurers, distributors, and others—because of a policy-making process that has worked for the good of all, rather than the advantage of some. The central question before the Council today is then: "Do we need to change something that is already working?" The burden of an affirmative answer rests with proponents, and yet there are multiple, obvious weaknesses to their argument:

- Evidence of a reduction in the carbon footprint is lacking;
- There is a failure to mention reduced crew share of catch by passing on the cost of leasing to the crew (similar to what has happened in some portion of the groundfish sector);
- Not addressed is the potential shifting of efforts to other species by vessels that own multiple permits. A vessel could lease the scallop permit but increase effort on other species such as squid, groundfish;
- Not addressed is the consolidation of ownership of quota that will result in excess market power and market control;
- Not addressed is the likelihood of reduce employment in the industry due to vertical integration and reduction in number of vessels.

Given the many evidentiary gaps, the Port of New Bedford itself commissioned the attached independent study/survey titled "Perspectives on Leasing and Stacking Proposal" conducted by Daniel Georgianna, PhD, Chancellor Professor Emeritus at the School for Marine Science and Technology at UMASS Dartmouth. Although the result of the survey suggests that a "leasing" program within the scallop fleet would give multi-vessel owners more flexibility to use their vessels efficiently, many other issues were also found to arise that could negatively affect the scallop fishery.

Of particular importance, the survey concludes that effective control over the fishery by a smaller number of larger-scale vessels owners would arise as permits and revenues became concentrated among the larger fleet owners. The result would be undue influence over the fishery and its infrastructure.

Furthermore, these larger fleet owners, by exercising their buying power, could obstruct smaller feet owners from critical shoreside services. Single vessels owners not associated with a larger vertically integrated scallop fishery and processing could also suffer lower ex-vessel prices. Crew income could similarly suffer as larger fleet owners gained increased bargaining power over crew and shoreside suppliers, and this could lead to a wage-based system.

It is safe to say that, at the very least, that there will be a loss of trust and cooperation within the fishing community. Indeed, we have seen evidence of that emerging discord and division during the scoping sessions that have already taken place. To my mind, opponents have been vociferously critical because they have astutely recognized the fundamental inequity that lies at the heart of the proposal: There is no denying that there will be costs and impacts associated with the leasing program. But those costs and impacts will not fall equally; they will fall disproportionately onto individual boat owners who do not consolidate. The playing field will be tilted on day one, perhaps irrevocably so, and the transformation of the scallop fishery from a "community fishery" to a "corporate fishery" may become all but inevitable.

I am deeply concerned by this potential outcome, and I would argue that the Council should be as well. For one, an outcome that has the effect of corporatizing the scallop fishery runs counter to years of Congressional oversight and guidance. By way of example, I would ask the Council members to consider the remarks of then Maine Senator Olympia Snowe in 2003 before the Senate Subcommittee on Oceans, Fisheries and Coast Guard. Senator Snow spoke to the importance of National Standard 8 when implementing the Magnuson-Stevens Act:

> *"Second and critically, National Standard 8 states that managers shall take into account the importance of fishery resources to fishing communities in order to provide for the sustained participation of such communities and, to the extent practicable, minimize adverse economic impacts on such communities. Again, in Amendment 13 the agency has offered little more than a minimal cursory assessment of how stock size relates to landings and income...This is far from what Congress intended. To the contrary, we directed fishery managers to recognize that their actions impact the livelihoods of an untold number of fishermen. We intended for managers to fully identify and analyze the effects of regulations on the social fabric of communities and then to factor that information into their management approach, so that fishing-dependent businesses in small coastal communities would not be unnecessarily harmed by Federal fisheries management."*

Although Senator Snowe offered her concerns regarding NMFS handling of the issue of stock assessments, I would argue that her sentiments are as valid today as then, and the Council would be well served by applying them to the matter at issue today.

As the most valuable fishing port in the nation, New Bedford has, without a doubt, more at stake in this matter than any community in the nation. The Council's decision will reverberate across the waterfront and into the homes and businesses of our residents, impacting tens of thousands of lives in ways large and small. I trust then that Council will fairly consider all comments and views regarding this important topic and reach a reasonable conclusion that is received with broad consensus. Indeed, achieving consensus is the only sustainable path forward. In the absence of broad consensus, the Council risks not only a harmful division among fishing interests but puts in jeopardy its own role as a fact-based, arbiter that acts to advance the broad public good.

That said, I am hopeful that the Council will decline to proceed with the proposal before it, based on the vigorous opposition presented by New Bedford stakeholders and the Council's own record of incorporating stakeholder feedback into its deliberations. Thank you for this opportunity to share my thoughts with the Council.

Sincerely,

Jon Mitchell
Mayor, City of New Bedford
Chairman, New Bedford Port Authority

ATTACHMENT: *Perspectives on Leasing and Stacking Proposal*

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May 11, 2022

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

RE: Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Director Nies:

I am writing to express significant concern regarding a potential scallop fishery Limited Access days-at-sea (DAS) and access area leasing program. The Port of New Bedford is home to the nation's highest grossing commercial fishing port thanks in large part to our scallop landings. Our robust and diverse array of shoreside businesses keep our fleet running smoothly year after year, making our harbor one of the most desirable fishing ports in the industry. No other port comes close to the annual scallop landings that New Bedford produces each year.

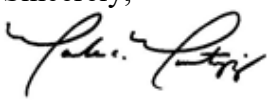
A scallop fishery Limited Access DAS and access area leasing program has the potential to disrupt this important economic ecosystem and the people who rely on it to earn a living. As such, I respectfully urge the Council to suspend efforts to further an amendment to the Atlantic Sea Scallop Fishery Management Plan so that more research can be conducted.

The Council's Scoping Document acknowledges that there is limited data available on captains and crew that participate in fisheries managed by it. The limited information from previous surveys covers all commercial fishermen with very little information specific to scallop captains and crews. Without a clear understanding of the workforce in this particular fishery, the Council should not proceed with a leasing program. Additionally, this document admits that additional analyses should be done to examine the relationship between individual and business ownership interests. These relationships can be complex, and therefore more analysis should be conducted prior to any further consideration of an Amendment to address leasing.

In New Bedford, we know from past experience that these programs can lead to industry consolidation, which can be highly detrimental to small, independent boat owners and shoreside businesses. Our community cannot afford to experiment with a highly successful scallop fishery that many in our city rely on to earn a living and to keep our economy strong.

In closing, the Council should reject a scallop fishery Limited Access DAS and access area leasing program at this time. More robust outreach and research must be done in order to better understand the complex economic ecosystem this fishery supports and how a leasing program could impact it. Now is not the time to implement significant changes to benefit a few, larger stakeholders without having a clear understanding of how this could impact the many small, independent boats and businesses.

Sincerely,



Mark Montigny
SENATOR

GREGORY F. MURPHY, M.D.
3RD DISTRICT, NORTH CAROLINA

COMMITTEE ON EDUCATION
AND LABOR

COMMITTEE ON VETERANS' AFFAIRS

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June 22, 2022

Thomas Nies
Executive Director
New England Fishery Management Council
50 Water Str., Mill #2
Newburyport, MA 01950

Dear Mr. Nies,

I write this letter in support of the North Carolina Fisheries Association's (NCFA) request to the New England Fishery Management Council (Council) to increase operational flexibility in the Atlantic Sea Scallop Fishery by exploring and developing a voluntary leasing program for the Limited Access Scallop fishery.

At the Council's June 1, 2022, scoping meeting on leasing held in New Bern, North Carolina, there was widespread support for a leasing program from the local scallop industry and the businesses that support it. I further understand there was similar support expressed at other scoping meetings held in New Jersey and Virginia.

The scallop industry serves as a major economic driver in both eastern North Carolina and for other regions on the east coast. The exploration and development of a leasing program would help ensure scallopers in these areas have an adequate supply of scallops to harvest now and in the future.

Because North Carolina is not represented on the Council, I urge you to give very strong consideration to the views of the NCFA's request. Thank you for your consideration of my letter.

Sincerely,

Gregory F. Murphy, M.D.
Member of Congress
North Carolina's Third District

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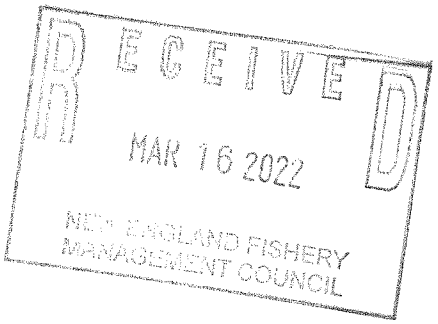
Nicholas Allardt 3/2/22

I do not want stacking and leasing!

MARCH 2, 2022

NO STACKING & CEASINGS PERMITS
NO! NO! NO!

Adam Bielski
340 Huttleston Ave
Fairhaven, MA 02719



March 10, 2022

Tom Nies
Executive Director
New England Fishery Management Council
50 Water St. Mill #2
Newburyport, Massachusetts 01950

Atlantic Sea Scallop Limited Access Leasing Scoping Comments

Dear Sir:

I am writing in opposition to the Leasing of permit allocations between vessels.

The proposal in itself can lead to many negative issues affecting the industry and communities that now provide support for vessels, crews and families of fisherman.

The Bottom Line!
If the proposal passes as an amendment:
Consolidation of form will take place and only create larger corporations within the scallop industry that will have more control of the resource from ocean to table and economically injure the smaller entities in the industry.

If it does not become an amendment:
The owners, crew, business entities, and the communities that support the Sea Scallop Industry will continue to thrive with the continued resiliency of the Sea Scallop Resource.

Sincerely,

Adam Bielski

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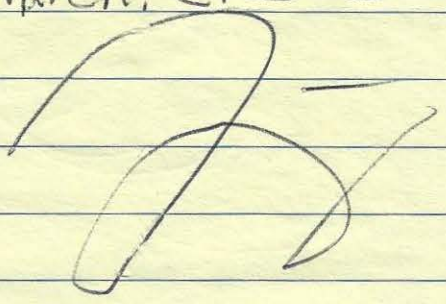
02/02/22 Jarred Brandso

I do not want stacking and fusing.

March 2, 2022

I do not want stacking } leasing -Robbie Flint

March. 2. 2022



Jared Riley

I Do Not want stacking and Leasing.

02-02-22 Timothy Winchenbach

I object to the Proposed Leasing - Fracking

02-02-22 Timothy Winchenbach

I object to the Proposed Leasing - Fracking