

# NORTHEAST SEAFOOD COALITION

December 5, 2011

Patricia Kurkul  
Regional Administrator  
NMFS, Northeast Regional Office  
55 Great Republic Drive  
Gloucester, MA 01930

Re: RIN 0648-BB40; Fisheries of the Northeastern United States; Changes to Vessel Replacement and Upgrade Provisions for Fishing Vessels issued Limited Access Federal Fishery Permits.

Dear Pat,

The Northeast Seafood Coalition ("NSC") submits the following comments in response to the advance notice of rulemaking to initiate changes to the current system of regulations that govern vessel replacements and upgrades.

NSC strongly supports a NMFS rulemaking to eliminate the tonnage restrictions. The present restrictions on tonnage result in an unnecessary administrative and financial burden. Since tonnage admeasurement can be both inconsistent and manipulated, it is not a reliable indicator of vessel capacity. It should be removed from the regulations.

NMFS should establish a more deliberate process, in conjunction with the New England Fishery Management Council and the Council's associated Committees and Advisory bodies, when reevaluating modifications to existing vessel baselines, replacements and upgrade restrictions for length and horsepower. These factors do play a role in determining capacity and do have merit when considering fleet diversity. In light of the recent deliberations on fleet diversity in the northeast multispecies fishery, NMFS should follow a more thoughtful and deliberate process for modifying the present restrictions. Although a higher upgrade percentage may be warranted, the recalculation should engage a more thoughtful process and be integrated among all fisheries.

Lastly, NSC does not see a problem with eliminating the one-time upgrade provision as listed under consideration #2 in the Proposed Rule.

Thank you for your consideration.

Sincerely,

*Jackie Odell*

Jacqueline Odell  
Executive Director

4 Parker Street Gloucester, MA 01930 Tel: (978) 283-9992  
62 Hassey Street New Bedford, MA 02740  
[www.northeastseafoodcoalition.org](http://www.northeastseafoodcoalition.org)