

CAPE COD COMMERCIAL
**FISHERMEN'S
ALLIANCE**

Small Boats. Big Ideas.

September 20, 2021

Mr. Tom Warren
HMS Management Division
NOAA GARFO
55 Great Republic Drive
Gloucester, MA 01930

RE: Comments on Proposed Rule NOAA-NMFS-2019-0042

Dear Mr. Warren,

Thank you for the opportunity to comment on the proposed rule for Draft Amendment 13 to the Highly Migratory Species Fishery Management Plan.

The Cape Cod Commercial Fishermen's Alliance is a member-based, nonprofit organization that works to build lasting solutions to protect our ecosystem and the future of our fisheries. The Fishermen's Alliance represents 150 fishing businesses and more than 300 fishing families, making our organization the leading voice for commercial fishermen on Cape Cod. We are deeply invested in the scientific assessments and public policies that impact our communities.

Fishermen's Alliance does not support proportional reallocation of Purse Seine category quota to directed bluefin categories. Reallocating Purse Seine quota to charter/recreational sectors would not have a proportionate effect on the fishery. The Purse Seine category targeted a larger, mature fish that had the chance to spawn, whereas recreational fisheries would be targeting smaller fish that may not yet have spawned. This undermines the conservation of a very important fishery.

We also oppose implementing a Harpoon category limit. By nature of this gear type, participants in this category will have days with zero fish. Therefore, this category requires the flexibility of no bag limit to balance out days with no fish. Current measures support this flexibility and give fishermen the ability to continue making a living. We support status quo for the Harpoon category.

Sincerely,



John Pappalardo
CEO

BOARD OF DIRECTORS Gwen Holden Kelly, *Treasurer* • Greg Connors, *Vice-Chairman* • Brian Sherin, *Clerk*
Andy Baler • Richard Banks • Gregory Bilezikian • Charles Borkoski • Beau Gribbin • Eric Hesse • Barry LaBar • Kurt Martin • Tim Linnell

1566 Main Street, Chatham, MA 02633 (508) 945-2432 info@capecodfishermen.org www.capecodfishermen.org