

My name is BG Brown and I am a commercial fisherman out of Gloucester, Massachusetts. I am a second generation fisherman. My father fished for 30 years, but unfortunately downsized in his last 10 years and lost all his catch history when he sold his boat. I have commercial fishing on and off for 25 years and an owner operator for the last 6 years. I gillnet out of 31' boat all winter long and have improved my landings almost every year since I owned the boat. Last year I would have said that I was in a good position, plenty of gear and I finally finished overhauling my boat. Because of this new catch share system and the time frame used, my future in the industry is based on someone else's ability to catch fish. The years used to determine own's ACE doesn't accurately represent those currently fishing. If there is any hope for me and those in the same situation in today's fishing industry than the following problems need to be addressed.

Urge Council not to postpone discussion to address groundfish goals and objectives related to fleet diversity, consolidation, and community protections. Postponing discussion will not help managers to achieve their own goals and objectives which are currently not being met.

- * I urge the Council not to postpone discussion to address groundfish goals and objectives related to fleet diversity, consolidation, and community protections.
- * Postponing discussion will not help managers to achieve their own goals and objectives which are currently not being met.
- * **There are many options that should be discussed, researched, and brought back to the industry for a meaningful discussion on ways to achieve the stated goals and objectives.**
- * Consolidation is hurting communities and driving the distribution of quota in one direction: towards the large-scale.
- * Lack of protections is leading us toward a less diverse fleet which hurts infrastructure as well as access to local fish.
- * The fishery is becoming unaffordable for independent fishermen.
- * There were inherent inequities with the initial allocation that have not been addressed.
- * There is a high concentration of effort happening in certain areas where fish are spawning.

- * In June 2010 the Council voted on these goals and objectives: 1. **Maintain inshore and offshore fleets**, 2. Maintain a diverse groundfish fishery, including different gear types, vessel sizes, geographic locations, and levels of participation. 3. Maintain a balance in the geographic distribution of landings to protect fishing communities and the infrastructure they provide and 4. Prohibit any person from acquiring excessive access to the resource, in order to prevent extraction of disproportionate economic rents from other permit holders.

- * Right now these goals and objectives will not be met.
- * A management program that cannot meet its own goals and objectives must be addressed.

- * There are many possible ways to achieve the stated goals and objectives listed above.
- * Leasing Policies – Under Days at Sea baseline leasing policies protected fleet diversity as well as made leasing/buying more affordable. Now there exists no such tool. There needs to be a tool in place that serves the same purpose as baseline leasing.

* Owner-Operator – Policies that increase the ability and opportunities for owner-operators to succeed in the fishery will help prevent excessive consolidation and lead to a more diverse fleet.

* Initial Allocation – There exists inequities in the initial allocation that must be addressed. Tools such as quota-set aside programs can help to achieve the stated goals above.

*Urge Council members not to delay this process.

Thank you,

BG Brown