



May 17, 2011

DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

RE: Groundfish Amendment 17 Public Review Comments

On behalf of the Northwest Atlantic Marine Alliance we support the Amendment 17 (A17) to the Multispecies Fisheries Management Plan, which seeks to create an administrative exemption for State Permit banks to provide affordable access to local community-based fishermen.

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We recognize permit banking as one of several critical tools to ensure coastal communities and smaller-scale fishermen maintain access to the rights to fish in New England.

Permit banks cannot get the job done alone. The implied goals for A17, as articulated in the A17 document, are listed below:

- Provide options to fishermen with little access to capital.
- Help fishermen to improve cooperation and operating efficiencies.
- Maintain small-boat enterprises through the combination of a variety of permit attributes to meet the needs of fishermen and fishing communities for access to fishery resources.
- Help fishing communities preserve stable access to local fishery resources for local fishermen.
- Preserve continued access to fishery resources for local, small-scale fishermen from small fishing communities throughout the states of Maine, New Hampshire, Massachusetts, and Rhode Island.
- Supplement existing access privileges held by fishermen in small communities.
- Mitigate the effects of fishing effort consolidation on small-scale fishermen and fishing communities in these four states.

In order to achieve the implied A17 goals as well as the stated goals of the NEFMC related to fleet diversity and excessive accumulation there must be additional policy tools that compliment the intent of permit banking. We recommend that NOAA support the use of additional tools in the multispecies fishery such as:

- Quota set-aside programs that secure community access to fishing rights.
- Leasing policies that foster affordability and fleet diversity.
- Policies that address the disproportionate impact of rules on small-scale businesses.
- Incentives for owner-operators and low-carbon footprint

- fishermen
- Limitations on the accumulation of fishing rights.

We support permit-banking programs that provide affordable access to community-based fishermen. We also urge NOAA to consider successful models within the affordable housing communities and apply those best practices to Permit Banks during the early stages of development. One common aspect of modern State or community-based affordable housing models is a provision that allows for property to transition back into the ownership of families (rent-to-own model). Current Permit Bank MOUs between NOAA and the States are void of this type of provision and we recommend it be put in place.

Thank you,

A handwritten signature in blue ink, appearing to read "Brett Tolley", with a stylized flourish above the name.

Brett Tolley
Community Organizer