



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
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APR 16 2015

Dear Terry:

I am concerned about several of the Habitat Committee's recommendations for Omnibus Habitat Amendment 2 preferred alternatives. This is not the first time I have raised such concerns. You may recall our letters from February 2014 and January 2015 regarding the Draft Environmental Impact Statement (DEIS) and the direction the Amendment is going. After a decade of development, the Council may be poised to take actions that significantly weaken, rather than improve, essential fish habitat (EFH) protection in New England.

The Magnuson-Stevens Fishery Conservation and Management Act requires¹ that we "minimize to the extent practicable adverse effects" on EFH caused by fishing, and "identify other actions to encourage the conservation and enhancement of such habitat." The Council's Goals and Objectives for this Amendment² are varied, but they include the goal of "enhancing groundfish fishery productivity" and several objectives related to "improved groundfish spawning protection, including protection of localized spawning contingents; improved protection of critical groundfish habitats; and, improved refuge for critical life history stages." We have fully supported these goals and objectives throughout the Amendment development.

Given the analyses in the DEIS and additional information submitted during public comment opportunities for the amendment, I feel strongly that the Committee's recommendations for preferred alternatives do not meet the Magnuson-Stevens Act's requirements and this Amendment's goals and objectives. This should not be surprising. Agency personnel have provided consistent guidance and feedback at the Committee level, and outlined my concerns as the Committee debated and ultimately recommended its preferred alternatives. The Committee's recommendations for two areas in particular, Cashes Ledge and Georges Bank, are severely inadequate, as outlined below.

Gulf of Maine

Collectively, the Committee's recommendations for preferred alternatives in the Gulf of Maine represent a 26-percent reduction in area size from the status quo protections and a 38-percent reduction in size from the Council's previously preferred alternatives in this region. More

¹ Magnuson-Stevens Fishery Conservation and Management Act, § 303(a)(7)

² OA2 DEIS, Vol. 1, Section 3.2



important than just area size alone, the Committee's recommended alternatives are expected to result in an increase in the adverse effects of fishing on EFH and a reduction in the protection afforded juvenile groundfish habitat. The Council must carefully consider the collective suite of alternatives and the resulting impacts to both EFH protection and spawning groundfish, as described in the goals and objectives. Within these recommendations, I am particularly concerned about the Committee's recommended approach for the Central Gulf of Maine that will undo many years of protection afforded to Cashes Ledge.

Eastern Gulf of Maine

At the February 2014 Council meeting, the preferred alternative in the Eastern Gulf of Maine sub-region included the Large Eastern Maine Habitat Management Area and the Machias Habitat Management Area, closed to mobile bottom-tending gears and gears capable of catching groundfish (Alternative 2, Options 1 and 5). The Committee recently recommended the Small Eastern Maine Habitat Management Area, closed to mobile bottom-tending gear (a portion of Alternative 3, Option 1). This represents a 76-percent reduction in habitat protection from the Council's previously preferred alternative. There is not currently much mobile bottom tending gear use in this region, so these gear restrictions would do little to minimize adverse effects in the short-term. However, there are currently no habitat management areas in place in this area, so the Committee's recommendations in this sub-region would represent a step towards protecting vulnerable habitat historically used by spawning and juvenile cod and other groundfish.

Central Gulf of Maine

I am especially concerned about the Committee's recommendation for the Cashes Ledge Closure Area in the Central Gulf of Maine. The Committee is recommending a mobile bottom-tending gear closure in the Modified Cashes Ledge, Fippennies Ledge, and Modified Jeffreys Bank Habitat Management Areas, with a prohibition on all fishing on Ammen Rock (Alternative 3, without Platts Bank, Option 1.) The Modified Cashes Ledge Habitat Management Area is 26 percent smaller than the current habitat closed area, while the modification to the Jeffreys Bank Habitat Closure Area would result in more vulnerable substrate being protected in roughly the same amount of area as the status quo area. The Fippennies Ledge Habitat Management Area is small and focuses solely on the top of the ledge. This recommendation is similar to the Council's previously preferred alternative, but adds Fippennies Ledge. In our January 8, 2015, comment letter, I noted our concerns about opening the status quo groundfish closure on Cashes Ledge in light of the recent Gulf of Maine cod stock issues and expressed strong support for the status quo.

The importance of the Cashes Ledge area is not limited to the ledge itself. Because the current Cashes Ledge Groundfish Closure (Alternative 1, No Action) is more than 3.5 times larger than the Fippennies and modified Cashes Ledge areas combined, and includes the deep basin between these two ledges and Sigsbee Ridge, it includes a greater diversity of habitats than in the areas that focus on the rocky ledges.³ This diverse mosaic of habitat types has been protected from the adverse habitat effects of trawling for 13 years and supports a variety of demersal fish species, including cod, haddock, plaice, pollock, witch flounder, redfish, monkfish, smooth and thorny

³ DEIS, Vol. 3, Section 4.2.1.2, Page 221

skate, and three species of hakes.⁴ Furthermore, gillnets, which were also used to catch cod and other species in the area before it was closed, would continue to be prohibited if the status quo gear restrictions in the groundfish closed area are left in place.

The Cashes Ledge area is known to provide excellent habitat for Atlantic cod. Structured bottom habitats provide shelter and food for juvenile cod and there is a resident cod population on the ledge.⁵ Recent research has shown that cod inside the groundfish closed area are larger than cod outside the area, indicating that it provides a refuge for spawning cod as well as excellent habitat for juveniles.⁶ Research has also shown that adult cod are found in the deeper mud and sand habitats around and between the ledges.⁷

Removal of the existing groundfish closure, and the gear restrictions on all gears capable of catching groundfish, in favor of the smaller areas recommended by the Committee with more limited prohibitions on mobile bottom-tending gear (except for the very small Ammen Rock area, where all gears would be prohibited), would compromise any recovery of bottom habitats in the larger area that has occurred over the last 13 years and potentially increase the adverse effects of fishing on a diverse array of bottom habitats used by resident and migrant populations of groundfish in the area. The Committee's recommendation for the Central Gulf of Maine, in concert with other recommendations for the region, substantially reduces the overall habitat protection benefits for the entire Gulf of Maine. We believe there is insufficient information in the record to show that the Committee's recommended preferred alternative improves juvenile groundfish habitat protections and would likely fail to meet the Council's stated goals and objectives.

As we have noted before, the status quo Cashes Ledge Closure Area is not only the most protective of a wide range of vulnerable habitats, the DEIS shows that it is the most economically practicable. The DEIS concludes that, "despite the current, direct costs to the fleet in terms of effort displacement, the status quo would be expected to result in slight positive economic impacts because of the protection of habitats supporting juvenile groundfish that are susceptible to fishing disturbance⁸."

Western Gulf of Maine

The Council previously preferred the status quo Western Gulf of Maine Closure Areas, with the existing gear restrictions, in combination with a slight expansion of the existing 12-inch roller gear requirement and an exemption for shrimp trawls in a small, defined portion of the northwestern corner. The Committee is recommending a modification to the status quo that would align the eastern boundary of the Western Gulf of Maine Groundfish Closure Area with the existing Habitat Closure Area, opening 25 percent of the current total closed area.

In combination with the reduction from the current closures in the Central Gulf of Maine and the reduction from the Council's preferred alternative in the Eastern Gulf of Maine, this additional

⁴ DEIS, Vol. 3, Table 41

⁵ Sherwood, G.D. and J.H. Grabowski 2010. Exploring the life history of colour variation in offshore Gulf of Maine cod (*Gadus morhua*). ICES J. Mar. Sci. 67:1640-1649.

⁶ See G. Sherwood comment letter, DEIS Public Comment Letter #166

⁷ See G. Sherwood comment letter, DEIS Public Comment Letter #166

⁸ DEIS, Vol. 3, Section 4.2.3.2.1, page 380

reduction further jeopardizes the Council's ability to comply with the requirements of the Magnuson-Stevens Act and meet the goals and objectives of this Amendment.

Georges Bank & Great South Channel

The Council had previously not identified a preferred alternative in the Georges Bank or Great South Channel/Southern New England sub-regions. I have been and continue to be very concerned about the Committee's approach for Georges Bank. The agency has consistently raised concerns about the Habitat Area of Particular Concern (HAPC) on the Bank as well as the overall reduction in meaningful protection areas that the Committee has discussed and now recommends as preferred. Even if HAPC designation was to be removed on the Northern Edge, we would remain very concerned about opening that area to mobile bottom-tending gears.

Georges Bank

The Committee is recommending the Georges Shoal 2 Habitat Management Area and the EFH South Habitat Management Area, closed to mobile bottom tending gear (Alternative 7, Option 1). The HAPC for juvenile cod was first designated in the Omnibus Habitat Amendment 1 in 1998 and was subsequently closed to mobile bottom-tending gear in 2003 as one of the habitat management measures intended to minimize the adverse effects from fishing on EFH on Georges Bank. As we have emphasized in earlier letters to the Council, opening the area would reverse 20 years of habitat protection and recovery in an area that is highly vulnerable to the adverse effects of mobile bottom-tending gear and would be inconsistent with the Council's decision in 2007 to maintain the HAPC designation for juvenile cod in this area. As we noted in a prior letter⁹, it seems unlikely that maintaining the gear restrictions in the Closed Area II Habitat Closed Area/HAPC alone would be sufficient to improve habitat protection for juvenile cod and other groundfish species on Georges Bank. Some additional area of vulnerable habitat along the northern edge of the bank would be needed in order to meet the goals and objectives of the Amendment.

Proponents of Alternative 7 suggest that the two Alternative 7 areas are of equivalent habitat value to the current habitat closure areas on Georges Bank. However, the areas of Alternative 7, despite the larger size¹⁰, fall far short of the current Closed Area II Habitat Closure Area in several key metrics, including a lower percent coverage of gravel-cobble¹¹, almost no juvenile groundfish hotspots,¹² and low abundance for most groundfish species (see below). The Georges Shoal 2 Habitat Management Area has little to no EFH for cod, haddock, pollock, and three skate species. EFH designations are based on the relative abundance of fish caught in trawl surveys, as well as other metrics. Therefore, the absence of EFH designations in this area demonstrates that groundfish occur in low numbers there because the habitat is largely unsuitable. One evaluation that illustrates this well is the EFH Overlap Analysis for the Georges Bank Alternatives.¹³ The EFH Overlap Analysis shows that the Georges Shoal 2 Habitat Management Area has the lowest total score of all of the areas under consideration on Georges Bank. The Georges Shoal 2 Habitat Management Area also has the lowest count of species represented and the lowest count

⁹ Letter to Chairman Stockwell, January 8, 2015.

¹⁰ HAPC = 650 km²; Georges Shoal 2 + EFH South = 1,316 km², DEIS Vol. 3, Table 48

¹¹ 65 percent in HAPC vs. 33 percent (Georges Shoal) and 46 percent (EFH south), DEIS Vol. 3, Table 48

¹² 19 in HAPC; 2 Georges Shoal + EFH South combined, DEIS Vol. 3, Table 68

¹³ DEIS, Volume 3, Section 4.2.1.4.9, Table 51, page 258

of EFH designations represented, despite being one of the larger mobile bottom tending gear closure alternatives in the region.

The area within Alternative 7 has very little current trawl or scallop dredge activity from which adverse effects are accruing, particularly in the most recent few years. This conclusion is based on the modeling results for the accrual of adverse effects over time (2000, 2005, and 2009)¹⁴, as well as the estimates of potential revenue displacement and the number of hours fished by different gear types in more recent years (2010-2012).¹⁵ Closing the area to bottom trawls and dredges would not displace much, if any, fishing, by those gear types and would not improve or minimize adverse effects of those gears in the region. On the other hand, opening the HAPC would result in an increase in adverse effects on even more vulnerable substrate.

Using nearly every metric in the DEIS, the areas in Alternative 7 do not have “equivalent habitat protection value” as the current closures on Georges Bank. It appears, particularly in concert with reductions in habitat protections elsewhere, that this measure would result in an increase in adverse effects on vulnerable habitat. Further, this alternative would fail to improve the protection of critical habitats that enhance survival, growth, and recruitment of juvenile groundfish. The Committee’s discussion and other public input, has, to date, failed to provide compelling rationale that demonstrates the information in the DEIS is incorrect or that other information about Alternative 7 meets the established goals and objectives.

At its April 9, 2015, meeting, the Committee voted to add an alternative that would modify the current Closed Area II Habitat Closed Area to open the most northern part of the area, close a portion of Closed Area II that is not currently included in the habitat closed area, and combine it with the Georges Shoal 2 Habitat Management Area from Alternative 7. The new Northern Edge area would appear to provide roughly equivalent protection as the existing area and allow some access to the heaviest concentration of scallops in the area. The Georges Shoal area does not contribute to the overall protection of the region, as described above. When compared to the existing closures, including the Closed Area I closures and the Nantucket Lightship Areas, and in conjunction with the Committee’s recommendation in the Great South Channel, this would not likely result in an “improvement” to juvenile groundfish habitat protection overall.

Great South Channel/Southern New England

The Council had not previously identified a preferred alternative in this sub-region. The Committee is recommending Alternative 5, Nantucket Shoals, closed to mobile bottom-tending gear, with an exemption for clam dredges in the majority of the area for at least three years, while a follow-on action to identify more discrete clam access areas is developed. The Habitat Plan Development Team originally identified four smaller areas of complex, stable substrate as potential habitat management areas in the Great South Channel. In early 2012, an analysis was completed to combine the area into a single habitat management area with approximately equivalent habitat protection value. Thirty-two percent, or 742 km², of Alternative 5 is vulnerable substrate¹⁶, Alternative 4 covers a greater percentage of the vulnerable substrate (40 percent, or 1,018 km²) and Alternative 3 covers an even greater percentage of vulnerable

¹⁴ DEIS, Vol. 1, Section 4.2.2, page 149-158

¹⁵ DEIS Vol. 3, Section 4.2.3.4, Table 94

¹⁶ Percentage of gravel, cobble, and boulder, DEIS Vol. 3, Section 4.2.1.5, Table 54

substrate (46 percent, or 1,533 km²) and includes juvenile cod hotspots. The Committee's preferred alternative would not provide as much protection as the other two alternatives, but may be more practicable by minimizing the economic impact on the groundfish and scallop fleets.

However, the clam exemption option being put forward by the Committee further weakens an already diluted alternative. Recent information provided by the clam industry clearly shows that they are fishing in parts of the Nantucket Shoals/Great South Channel area identified by the Swept Area Seabed Impact model as cobble and boulder-dominated substrates. These substrates are more vulnerable to the adverse effects of fishing than the sandy sediments that clam dredges were assumed to be fishing in.¹⁷ This apparent contradiction stems from the substrate classification types where cobble and boulder-dominated substrates can include patches of sand and gravel. Clearly, clam dredges are being used successfully in this type of patchy bottom, apparently because of the short tows in selected areas where clam dredge operators know they can avoid damage to the gear. Given what the DEIS concludes about the impacts of hydraulic clam dredges on the type of habitats where they are fishing¹⁸, I do not support the clam dredge exemption in the Great South Channel, or anywhere on Georges Bank, in substrates identified as more vulnerable. An exemption for clam dredges would substantially reduce or nullify any of the benefits gained from a prohibition on bottom trawls and scallop dredges and would not contribute to the overall habitat protections in the region.

Our concerns about the gear modifications options (Options 3 and 4) are well known.¹⁹ Unfortunately, the Committee is recommending Option 4, a prohibition on groundcables, as a management option for the two Cox Ledge Habitat Management Areas. The Committee and members of the public have consistently stated that these gear modifications are viable alternatives, largely based on their use as habitat conservation measures in other regions of the country. This is not a compelling argument. It is a vague and broad comparison that does not consider specific analyses that supported such use on the west coast, and ignores the information compiled by the Plan Development Team with respect to gear modification for impact mitigation within our region. The DEIS states unequivocally that these measures cannot be shown to minimize adverse effects on habitat in our region.²⁰ Because of the unknown impact to catch efficiency, the potential for the swept area reductions to be cancelled out by longer tows means that we cannot rely on this as a measure to effectively minimize adverse effects. No new information has been provided that would indicate that this measure would be likely to minimize adverse effects from fishing and should not be used in an attempt to comply with that requirement.

Combined Habitat Management Alternatives

Looking at the habitat management alternatives collectively, the combination of preferred habitat management areas being recommended by the Committee results in meaningful reductions in overall habitat protection and would fail to adequately minimize the adverse effects from fishing on EFH in the region. Our preliminary evaluation of the Committee's recommended

¹⁷ The effects of hydraulic clam dredges in cobble and boulder substrates were not evaluated because it was assumed, based on input from the clam industry, that the gear could not be operated in these habitat types.

¹⁸ DEIS, Vol. 3, p. 156 and Vol. 1, Section 4.2.2.1 and Figure 5, pp 136-138.

¹⁹ Letter to Chairman Stockwell dated February 21, 2014.

²⁰ DEIS, Vol. 3, Section 4.1.2.3, page 159

combination of measures indicates they do not appear to comply with the Magnuson-Stevens Act requirement to minimize to the extent practicable the adverse effects from fishing on EFH. As noted above, several components of these alternatives would also fail to satisfy the goals and objectives and purpose and need of the Amendment.

Spawning Alternatives

The Committee contends that the proposed Gulf of Maine Cod Protection Measures in Framework Adjustment 53 to the Northeast Multispecies Fishery Management Plan are sufficient to meet the Habitat Amendment's objective of "improving groundfish spawning protection." However, the collective set of recommendations, including those for the year-round habitat protection measures, need to be considered when determining if the goals and objectives related to spawning protection would be achieved.

Framework 53, if approved as recommended, would modify the existing set of rolling closures by removing the April closures, slightly modify the May and June closures, and would implement new closures in the winter (November–January). Framework 53 would also maintain the October and March rolling closures that are only applicable to the small fraction of the groundfish fleet within the common pool.

The Framework 53 Environmental Assessment submitted by the Council concludes that the impacts of the measures on Gulf of Maine cod and other groundfish are mixed. There are likely positive impacts on the winter spawning Gulf of Maine cod population, but likely negative impacts on the stock's spring spawners.²¹ Likewise, there would be some negative impacts on other spring spawning groundfish, including winter flounder, yellowtail flounder, American plaice, and haddock, and, to a lesser extent, witch and windowpane flounder from the removal of the April closure. The only species for which a slight positive impact would be expected is ocean pout, which spawns in the fall and winter. All of these groundfish stocks, except for haddock, are either under a rebuilding plan and/or have stock sizes trending downward. I find it impossible to rationally understand how, in light of the Framework 53 analyses, the Committee's recommended spawning alternative meets the objective of improving groundfish spawning protection.

It is also important to note that modifications to the year-round closures will have impacts on spawning fish, the potential for which is not considered in the impacts discussion in Framework 53. While fish do not spawn year-round, the year-round groundfish closures have provided some level of spawning protection by excluding disruptive gears from areas where spawning fish congregate. The potential opening of the Cashes Ledge Groundfish Closure to all gears throughout the basin and non-mobile bottom-tending gears on the ledge itself could have negative implications for cod, witch flounder, haddock, and plaice.²² Gillnets have been shown to disrupt cod spawning aggregations.²³ In addition, the DEIS concludes that both Alternatives 3 and 4, similar to the Committee's preferred alternative, would have a slightly negative impact on

²¹ FW 53, Section 7.1.2.1.3.2, page 210

²² FW 53 Appendix II (maps of spawning condition fish in block 130)

²³ Dean, M.J. et al. 2012. Disruption of an Atlantic cod spawning aggregation resulting from the opening of a directed gill-net fishery. *N. Amer. J. Fish. Mgmt.* 32:124-134.

large-mesh spawning groundfish relative to the status quo²⁴, although low sampling contributes to a high amount of uncertainty in this region. We also know that the cod population on Cashes Ledge is resident and less productive than other, more mobile cod populations.²⁵ As such, careful consideration should be given to the potential impacts from allowing even non-mobile bottom-tending mobile gear capable of catching groundfish into the area where this sub-component of the cod stock is present. Once a sub-population of spawning cod is lost, it is not likely to recover.²⁶ Protection of localized sub-populations or spawning contingents was pointed to as being particularly important under the goals and objectives. In addition to the habitat protection described above, the status quo Cashes Ledge Groundfish Closure Area would continue to provide this protection.

Additionally, the Council's currently preferred measure, the implementation of a discrete closure within portions of blocks 124 and 125 from November through January (Massachusetts Bay Spawning Protection Area), would be spatially covered by the Framework's measures. This action would implement additional gear restrictions (i.e., prohibit the use of mid-water trawls, purse seines, and recreational groundfish fishing²⁷) beyond what the Framework's Cod Protection Measures would implement. While this would be an improvement of the winter closures, it is a small proportion of the areas and is likely to have a minimal impact on protecting spawning fish beyond the closures recommended in the Framework.

In addition to these changes in the Gulf of Maine, the Habitat Amendment is considering spawning measures on Georges Bank. The currently preferred alternative would change Closed Area II and Closed Area I Habitat Closed Area North from year-round to seasonal closures from February 15–April 15 of each year. Currently exempted gears would be permitted into the areas during the seasonal spawning closures, including scallop dredges, mid-water trawls, other pelagic gear, and trap gear. There is no explanation why these gear types would be allowed in these spawning areas, but not in others. As a result, the only change is in the reduction in season from year-round to 3 months. The DEIS concludes that the Committee's recommended preferred alternative (Alternative 3, with options B and C) would result in negative impacts on the groundfish resource and productivity, relative to the status quo.²⁸

Given the Council's conclusions in Framework 53 and the DEIS on the impacts to groundfish from the Committee's preferred alternatives (both spawning and habitat management), it is difficult to see how the goal of "improving groundfish spawning protection, including protection of localized spawning contingents or sub-populations of stocks" would be met with the implementation of those recommendations alone. To address this, I feel strongly that the Council should consider restoration of some or all of the April rolling closure blocks, seasonal or year-round closures of Cashes Ledge to gear capable of catching groundfish, increased gear restrictions in the existing and proposed seasonal closures and in the Georges Bank proposed spawning modifications, or some other additional measures in order to meet the goals and objectives of the Amendment.

²⁴ DEIS, Section 4.2.2.4.2, page 290

²⁵ Sherwood, G.D. and J.H. Grabowski 2010. Exploring the life history of colour variation in offshore Gulf of Maine cod (*Gadus morhua*). ICES J. Mar. Sci. 67:1640-1649.

²⁶ Ames EP (1997) Cod and Haddock Spawning Grounds in the Gulf of Maine. Island Institute, Rockland, Maine

²⁷ DEIS, Vol. 3, Section 2.2.1.3

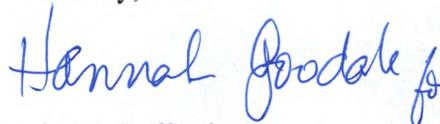
²⁸ DEIS, Section 4.3.2.2.4, Page 525

Conclusion

In developing the Omnibus Amendment, the Council concluded that habitat specific management measures were necessary to continue to comply with the Magnuson-Stevens Act requirements to minimize adverse effects.²⁹ The areas that were implemented as habitat protection areas in Northeast Multispecies Amendment 13 and Scallop Amendment 10 have been used to demonstrate compliance with this requirement since 2004 across most of the Council's fishery management plans. While there is no requirement to necessarily maintain or increase the footprint of habitat protection in size alone, the Council needs to demonstrate that the new suite of habitat protection measures would continue to minimize to the extent practicable the adverse effects from fishing on EFH and improve juvenile groundfish habitat and spawning protections. There is a compelling amount of analysis in the DEIS and many additional studies provided for the Council's consideration that strongly suggest the Committee recommendations have not made use of the best available scientific information, as it pertains to habitat protection and long-term improvements for groundfish spawning. I am very concerned about this. It is critical that the Council relies upon the best scientific information available when making its final decisions because we cannot approve measures that are contrary to that information. Moreover, there is an appearance that the collective suite of alternatives being recommended to the Council by the Committee substantially decreases habitat protection in New England, and fails to meet the Amendment's goals and objectives. For the reasons previously outlined, this is particularly evident in the Central Gulf of Maine and on Georges Bank. Based on our preliminary evaluation of the Committee recommendations, we believe we would not be able to approve substantial portions of the Amendment if the Council adopts the Committee recommendations in full.

I strongly encourage all of the Council members to consider the long-term implications of the decisions to be made at this upcoming meeting.

Sincerely,



John K. Bullard
Regional Administrator

cc: Thomas Nies, NEFMC Executive Director
Richard Robins, MAFMC Chairman
David Preble, NEFMC Habitat Committee Chairman

²⁹ A13, Section 4.2.7.1.1, page I-204; DEIS Vol. 1, Section 1.2.2.1