

February 25, 2015

John K. Bullard, Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Re: Comments on Gulf of Maine Cod Sector Exemption Request

Dear John,

The Northeast Seafood Coalition (NSC) is writing to express our support for the sector exemption request offered by Northeast Fishery Sector IV, Gloucester Fishing Community Preservation Fund (GFCPF), working in collaboration with several other groundfish sectors.

On December 13, 2014, NSC submitted extensive public comments on the GOM cod Interim Management Measures enacted by NMFS on November 13, 2014. Within our comments NSC supported a proposal submitted by the GFCPF that had worked with other groundfish sectors to acquire 60 metric tons of GOM cod in return for relief from the possession limit, BSA restrictions and closures planned for March 2015 to allow access to GOM haddock. The proposal submitted was in direct response to the Council's request for "GARFO to analyze the possibility of taking away some unused ACE rather than have the 200 lb. trip limit."

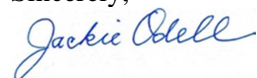
NSC reiterates our support for this original request and is now commenting in support of this recent sector exemption request. Under the present sector exemption request the 30 metric tons of GOM cod offered in return for relief from the trip limit and accompanying BSA restrictions results in far greater biological benefits for GOM cod than the 20 metric tons generated by the 200 lb. trip limit. Furthermore, the present sector request eliminates the biological waste estimated, according to NMFS analysis, by the 200 lb. trip limit. The sector exemption request achieves this greater conservation benefit while minimizing economic hardships.

However, NSC would be remiss not to identify the additional 30 metric tons of GOM cod offered by the GFCPF to be relinquished for relief from the March closures to allow access to GOM haddock. This request is presently not being considered under this rule making. This is a tremendous loss for the inshore fleet whose fishing grounds have been impacted by seasonal inshore fishing closures by the GOM cod Interim Management Measures and, thus, have had little to no income from groundfish fishing since November.

NSC conveyed that access to GOM haddock had been essentially eliminated through the area closures implemented by the GOM cod Interim Measures through the NSC public comments submitted for the GOM haddock Emergency Action on December 12, 2014. NSC noted the increase in the GOM haddock ACL would have little economic benefit for commercial vessels most impacted by the seasonal GOM cod closures because the GOM haddock fishery is seasonally limited for inshore areas, from mid-February through April.

Although NSC is discontent that NMFS was unable to reconsider access to the March closures, NSC does appreciate NMFS's willingness to reexamine a sector-based solution for the Interim Management Measures for GOM cod and is fully supportive of the current sector exemption request under consideration.

Sincerely,

A handwritten signature in blue ink that reads "Jacqueline Odell".

Jacqueline Odell
Executive Director