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NORTHEAST
SEAFOOD COALITION

September 12, 2013

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



Dear Mr. Bullard,

On 11 March 2013, the Northeast Seafood Coalition submitted comments to the proposed rule to implement an emergency action for the monkfish fishery (please see enclosure). You will recall the intention of the emergency action is to help mitigate adverse economic and social harm resulting from substantial across-the-board groundfish Annual Catch Limit (ACL) reductions by providing additional fishing opportunities.

In the March letter, NSC supported efforts to liberalize existing monkfish input controls in the Northern Fishery Management Area. Based on input from stakeholders, NSC recommended increasing allocated monkfish DAS for Monkfish Category C and D permits. This recommendation was based on the fact that the daily possession limit had not been the constraining factor for C and D monkfish vessels. Instead, the constraint had been on the number of limited access monkfish days allocated. NSC and its stakeholders felt these recommendations, along with others noted in the submitted comments, would appropriately achieve the emergency action's intended purpose: more fishing opportunities for vessels affected by groundfish ACL reductions.

Our members and their Northeast Fishery Sector organizations are in the midst of a crisis that will continue now for many years. Groundfish-dependent businesses and communities need all possible mitigating opportunities to survive the low ACLs. We strongly urge you to reconsider the implemented emergency action to reflect the recommendations of the NSC. We believe these recommendations will provide more fishing opportunities for vessels, and in turn will provide desperately needed economic mitigation to the fleet.

Sincerely,

Jacqueline Odell
Executive Director

cc Tom Nies, New England Fishery Management Council Executive Director
Phillip Haring, New England Fishery Management Council Monkfish Plan Coordinator
Tom Dempsey, New England Fishery Management Council Monkfish Oversight Committee Chair
Douglas Christel, National Marine Fisheries Service Fishery Policy Analyst

Enclosure

NORTHEAST SEAFOOD COALITION

March 11, 2013

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

Dear John,

The Northeast Seafood Coalition (NSC) submits the following comments for the proposed rule to implement a temporary emergency action for the monkfish fishery.

NSC supports the effort to liberalize the existing monkfish input controls in the Northern Fishery Management Area (NFMA) for the purpose of mitigating the adverse economic impacts of the annual catch reductions for key groundfish stocks. However, to accomplish this goal, NSC offers the following recommendations to provide necessary fishing opportunities to vessels affected by the reductions without resulting in overfishing monkfish within the NFMA.

- For Monkfish Category C and D Permits, increase the number of allocated monkfish DAS from 40 DAS to 60 DAS.
- For Monkfish Category E Permits increase the proportion of total fish on board for monkfish (tail weight) from up to 25% of the total weight of fish onboard to up to 50% of the total weight of the fish onboard.
- Maintain the existing possession limit on all Monkfish Permit Categories.
- Allow for a running clock provision for Monkfish Category C and D Permits. Such a provision would allow monkfish caught on a trip which is in excess of the possession limit to be landed and covered by the appropriate number of days. (Note: the intent of this provision is to continue to charge monkfish DAS for the entire trip by days absent (as it is currently) plus any additional days necessary to cover an overage.)

NSC's recommendations set forth above are intended to provide opportunities for the NFMA while minimizing any unintended consequences to the resource. Furthermore, modifications made in the NFMA should not inadvertently increase fishing effort in the Southern Fishery Management Area.

Thank you for your consideration,

Jackie Odell

Jackie Odell
Executive Director