

Sally McGee, Chair
Scallop Oversight Committee
New England Fishery Management Council
50 Water Street
Newburyport, MA 01950

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March 31, 2009

Dear Sally,

We are writing to express our views on some of the General Category topics that the Committee and Council will discuss during their April meetings. Most or all of us will not be able to attend these meetings, because we are in the middle of a fishing derby; but we'd like the Council members to hear our views on some of the issues in front of you.

As it is, the IFQ program will prevent small, independent fishermen from building viable businesses. The allocation process has left every one of us without enough quota to put together a full-time, profitable business; and we can't buy additional quota without also buying all the attached permits. This type of restriction just doesn't work with a quota-system like it does in a days-at-sea fishery.

We urge the Committee and Council to give us a chance to buy enough quota to sustain our businesses. We would like the ability to buy a permit's entire quota allocation separate from the IFQ permit itself and all other permits held by the original vessel; we support keeping the ownership caps that are already in place to help prevent too much consolidation. This would make it so we can get the quota we need without having to find a way to buy a bunch of groundfish and other permits that we don't want and can't afford.

We understand that some Council members were wary of this concept. But we hope that, with a better understanding of the issue, all members will recognize that this is the only way to help us survive.

Thank you very much,

Sincerely,

James Bergstrom, Andrew Keese, Robert Keese, Thomas Reilly, Tye Vecchione