



CAPE COD COMMERCIAL HOOK FISHERMEN'S ASSOCIATION, Inc.  
 210-E Orleans Road  
 North Chatham, MA 02650  
 508-945-2432 • 508-945-0981 (fax)  
 www.ccchfa.org • contact@ccchfa.org

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Paul J. Howard, Executive Director  
 New England Fishery Management Council  
 50 Water Street  
 Newburyport, MA 01950

February 9, 2009

Dear Captain Howard,

**Problem:**

As the General Category changes to ITQ management, initial allocation will leave almost every fisherman without enough quota to support a viable business. Given current restrictions, it will also be extremely difficult for those fishermen to buy enough quota to fill their needs. In short, the livelihoods of many of these fishermen will be at risk.

**Our Proposal:**

To address this problem, a group of General Category fishermen proposed a harvesting cooperative, or Sector. This group would acquire scallop quota (up to existing Sector ownership cap) for the purposes of securing healthy fishing businesses for all members. To allow for a successful Sector, our proposal includes:

- Allowance for the Sector to gain future exemption from non-target species closures on a case-by-case basis, only where appropriate and supported by data.
- Ability of Sector to acquire managed species bycatch quota if/when approved by other FMPs.
- Finally, in order to acquire enough scallop access to support Sector members' businesses, we seek the ability for our Sector to purchase a *single* Limited Access permit. The Sector would forfeit all open-area DAS and simply divide the pounds associated with the permit among Sector members. This quota could only be fished by owner-operator Sector members and would be harvested within existing General Category trip limits (400 lbs).

Hopefully, this letter has clarified our purpose in developing this Sector, which is to protect small fishing businesses in our region. We appreciate your consideration.

Tom Dempsey  
 Cape Cod Hook Fishermen's Association