



Dr. John F. Quinn
Chairman
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

September 30, 2019

Dear Chairman Quinn,

I am writing to ask for your support in ranking the voluntary Scallop Leasing Demonstration Project third on the NEFMC 2020 Priority Task List for the Scallop Committee. Our request is that this project be prioritized to follow the 2021 specifications framework and Amendment 21 (A21).

Ten years ago, I was involved in a stacking and leasing effort during Council consideration of Amendment 15 (A15). At that time, the Council identified fishing capacity reduction as a major goal of the Amendment. The Scallop Committee, the PDT, and Council staff put a significant amount of work and resources into that proposal, following normal Committee and Council procedures. However, due to lingering concerns, the proposal ultimately failed on final passage by the slimmest of margins.

From that experience, we learned that industry and Council members were highly concerned about the permanent nature of the proposal, the fear of creating “super boats” with large allocations of DAS that could be used in any manner, and the unknown impacts of the proposal on non-participants. Now, a decade later, permit holders still do not have any mechanisms to match their fishing capacity with their resource allocations.

Based on these lessons and others we have learned from over a decade of experience, today we are asking the Council to develop a multi-year leasing demonstration project for the limited access scallop fishery. We think this is a logical next step, as the Council has already authorized leasing in one segment of the fishery. Additionally, the temporary nature of this project will provide the Council opportunities to evaluate, modify, and even end the program.

While the details and outcomes of the demonstration project would be determined through the Council process, the vessel owners we represent have agreed to support a set of core principles, including:

1. The project should be conservation neutral;
2. It should increase resiliency in the fishery;
3. It should provide operational flexibility and economic benefits broadly to the industry;
4. It should increase job security and safety for crew; and
5. Most importantly, it should fully protect non-participants (vessels that do not elect to participate in the leasing demonstration project).

Using these core principles, we have developed an initial “four corners” draft proposal, but expect and respect that this would be more fully developed through the standard Council process of industry and public participation, as well as Council development and deliberation.

In making our request to initiate development of the program, we offer several recommendations to promote conservation neutrality and address efficiency concerns, including:

1. No vessel would be allowed to lease and add more than one permit allocation of DAS and access trips to an existing permitted vessel;
2. Permits would retain their unique, individual identities; and
3. DAS from different permits would be fished on separate trips, rather than on the same trip.

Lastly, I want to emphasize that we are not seeking to displace or delay the important work the Council must do next year regarding 2021 specifications framework action and A21. Rather, based on our discussions with staff, we understand the leasing demonstration project would be addressed as Committee and staff time allow. Nevertheless, we believe solid progress on this project can be made in 2020, and we ask you to support our request.

Our group already includes approximately 100 limited access permits, and we are hopeful that if the Council includes this issue in its ranking for 2020 priorities, even more will engage. To help us with the challenges ahead, we've put together a small team to work with the Council and staff. I am particularly pleased that Rick Robins has agreed to be a key member of the team. Rick's knowledge of the issues and the Council process will be invaluable as we move forward. Please contact Rick (757-876-3778) or me if you have any questions or if we can provide any additional information.

With kind regards,

A handwritten signature in black ink, appearing to read "Jeffrey Pike". The signature is stylized and cursive.

Jeffrey Pike