



May 27, 2020

Michael Pentony
Regional Administrator
55 Great Republic Drive
Gloucester, MA 01930

Re: Comments on the 2020 Sector Interim Final Rule

Dear Mike,

The Northeast Seafood Coalition (NSC) supports the 2020 Sector Interim Final Rule comments as submitted by the Northeast Sector Service Network (NESSN).

As requested by NESSN, NSC urges the Agency to immediately reinstate the Redfish Exemption Area to its pre-fishing year 2020 state. The Agency should focus on ensuring compliance with the exemption on a Sector by Sector basis and work collaboratively with the Sectors and their members who are using this exemption and have the expertise in the redfish fishery to foster improvements and make adjustments accordingly.

The preliminary analysis conducted by NESSN clearly details the flaws and inadequacies underlying the Agency's decision to modify the exemption areas. These modifications were absent any substantive collaboration with the Sectors. In fact, as the NESSN comments point out, it diverges from feedback offered by the sector managers earlier this year. The inability of the Agency to work in cooperation with the sectors runs contrary to co-management principals of the sector management program and this action conflicts with the Agency's reported efforts to improve communication and rebuild trust with the fishing industry.

Furthermore, the redfish exemption modification is at complete odds with the policy and intent of Executive Order 13921 and other Congressional efforts to provide opportunities for the fishing industry in light of the global pandemic. On May 7, 2020, the Trump Administration offered clear directive in Executive Order 13921 to reduce the burdens on domestic fishing and to increase production within sustainable fisheries. Redfish is an underutilized stock. Redfish, along with other underutilized groundfish stocks, will be the key focus of the New England Fishery Management Council in the coming weeks.

Sincerely,

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

Jackie Odell
Executive Director

Cc: Chris Oliver, Assistant Administrator for NOAA Fisheries
Tom Nies, Executive Director, New England Fishery Management Council
Libby Etrie, Program Director, Northeast Sector Service Network

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