



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
NORTHEAST REGION
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MEMORANDUM FOR: Nancy B. Thompson, Ph.D.
Science and Research Director

FROM: 
Patricia A. Kurkul
Regional Administrator

SUBJECT: Comments on Proposed Standardized Bycatch Reporting
Methodology (SBRM) Prioritization for 2009

Following the presentation by your staff of the proposed 2009 SBRM prioritization at the February meetings of the New England and Mid-Atlantic Fishery Management Councils, I requested that my staff review the prioritized observer coverage levels. As a result, we offer the following comments:

In general, future iterations of this report would be improved if more information was provided to explain the basis for the proposed prioritization, particularly for fleets for which the proposed observer coverage levels differ substantially from the levels indicated by the “available coverage with shortfall applied proportionally” or the SBRM Amendment preferred alternative. For example, this year’s report should have more clearly explained the rationale for allocating 680 observer sea days to the New England large-mesh gillnet fleet when the SBRM Amendment preferred alternative would only require 187 sea days. Other examples include the Mid-Atlantic small-mesh gillnet fleet, for which the SBRM Amendment preferred alternative would require 1,155 sea days, but 0 are proposed; and the New England large-mesh otter trawl fleet, for which 1,978 sea days are proposed, but the SBRM Amendment preferred alternative would require only 1,233 sea days. Contrast this latter example with the New England small-mesh otter trawl fleet, for which only 129 sea days are proposed, but the SBRM Amendment preferred alternative would require 4,027 sea days. Understanding the rationale for these proposed coverage levels is important for us and the Councils, in order to have an informed discussion of the relative trade-offs involved in increasing observer coverage in some fleets from the SBRM Amendment levels while decreasing coverage in others.

We need to better understand the justification for the proposed coverage level of 123 sea days for the New England mid-water trawl fleet (i.e., the herring fishery). As you know, there are substantial monitoring issues associated with the herring fishery, and bycatch monitoring in this fishery is a highly visible and controversial issue. I am concerned that the proposed coverage level may not be adequate. I am also concerned with the proposed level of coverage for the New England and Mid-Atlantic small-mesh otter trawl fleets



(i.e., the squid fishery). The prioritization proposes only 354 sea days, combined, for these fleets, in spite of target coverage levels in excess of 5,500 sea days under the SBRM Amendment preferred alternative. We need to ensure that the coverage levels are sufficient for monitoring of the butterfish bycatch cap recently proposed for the *Loligo* fishery in Amendment 10 to the Mackerel, Squid, and Butterfish Fishery Management Plan. Previous discussion between our staffs on this issue assured us that, if approved, such a cap could be monitored through observer coverage. Is that still the case?

Lastly, I would appreciate some additional discussion of the proposed coverage level for the SAP/B DAS/US-CAN fishing mode. It is unclear whether the proposed 1,940 sea days are sufficient to address, and mitigate, the monitoring concerns associated with these unique programs. In particular, please explain the interactions between the sea days allocated to these specific programs with the proposed coverage levels for fleets such as the New England large-mesh otter trawl fleet (1,978 days) that overlap substantially with the SAP/B DAS/US-CAN programs.

Thank you for considering our comments on this very important issue.