



Coalition for the Atlantic Herring Fishery's Orderly, Informed and Responsible Long Term Development

March 10, 2011

Paul Rago, Chief
Population Dynamics Branch
NMFS NEFSC
166 Water Street
Woods Hole, MA 02543

Re: SBRM observer coverage levels

Dear Paul,

I am writing on behalf of CHOIR to comment on the projected SBRM observer coverage levels for the Atlantic herring fishery. CHOIR is an industry coalition made up of over 440 commercial and recreational fishing organizations, fishing and shore side businesses, researchers and eco-tourism companies working together to ensure proper management of the Atlantic herring resource.

We are concerned with what appears to be a rather significant drop in projected observer coverage levels for single and pair midwater trawls in the herring fishery for April 2011-2012. As you likely know, there is widespread concern about levels of bycatch in the midwater trawl fishery here in New England. Many fishermen in this region believe that much of this bycatch has been missed by observers due to the low levels of coverage normally seen in the fishery. This low coverage has also led to a lack of understanding of what is being dumped in the fishery, including both herring and other species.

While coverage levels were higher last year due to extra funding for observing in Closed Area I, we are disappointed to see that levels may drop again in the coming year. Given all of the concern over what these boats are catching, we find it hard to understand how levels could possibly drop in the coming year.

In order to accurately assess the levels of bycatch in the midwater trawl fishery, it is critical that the NEFSC ensure that coverage levels do not drop for the coming year. We also believe that it is important to ensure adequate levels of coverage throughout the fishery, not just in one closed area. Until this fishery has consistent levels of coverage- both in terms of overall percentage of coverage as well geographical coverage- the NEFSC and fishery managers will not have an accurate understanding of bycatch levels in this fishery.

We urge you to ensure that levels do not drop in the midwater trawl fishery in the coming year. We also urge you to ensure that coverage levels are balanced so that adequate monitoring is achieved in all areas, including Areas 1A and B. Lastly we believe that when it comes to distributing the limited amount of days available that midwater trawl vessels should take priority over purse seine vessels as there is far more concern regarding the former than the latter.

Thanks for your time,



Steve Weiner, Chair