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New England Fishery Management Council

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E.F. "Terry" Stockwell III, *Chairman* | Thomas A. Nies, *Executive Director*

January 29, 2016

Mr. Alan Risenhoover
Director, Office of Sustainable Fisheries
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East-West Highway, Room 14743
Silver Spring, MD 20910

Dear Mr. Risenhoover:

Thank you for the opportunity to comment on the draft guidance for the review of catch share programs provided to the Council Coordinating Committee on October 1, 2015. The New England Fishery Management Council encourages the evaluation of fishery management programs to ensure their effectiveness in meeting program goals and promoting sustainable fisheries. As evidence of this commitment, we completed a review that was not required of our General Category Limited Access Individual Fishing Quota program. Unfortunately, we have serious concerns with the draft guidance. We believe it describes a process that is unmanageable with current data and resources.

As described, a review would be almost impossible to complete in a manner consistent with the guidance. Any attempt to accomplish a review as proposed would likely take multiple years to complete and would limit the ability of the Council to address other issues. Overall, the draft guidance should be simplified and made more concise, providing the latitude for Councils to tailor reviews to each unique catch share program, focusing on evaluating what is relevant. The statutory requirements for Limited Access Privilege Program reviews should be clearly distinguished from recommendations for best practices.

Attached are more detailed comments approved by the Council. Please contact me if you have any additional questions. Thank you for your attention to our comments.

Sincerely,

Thomas A. Nies
Executive Director