



## New England Fishery Management Council

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Robert E. Beal  
Executive Director  
Atlantic States Marine Fisheries Commission  
1050 N. Highland St, Suite A- N,  
Arlington, VA 22201

Dear Bob:

On behalf of the New England Fishery Management Council, please accept the following comments on American Lobster Addendum XXVI/Jonah Crab Addendum III. While our comments below focus mainly on the lobster fishery, we support enacting these monitoring improvements in both the lobster and Jonah crab fishery management plans.

On the first question, what percentage of harvesters should be required to report in the American lobster and Jonah crab fisheries, the Council supports Option C, 100% trip-level harvester reporting. Harvester reporting rates are 100% for most states, but only 10% for Maine. While many Maine vessels fish in state waters only, a large number fish in federal waters using federal permits. Requiring full reporting from these federally permitted vessels will create parity with other federal waters fisheries managed by the New England and Mid-Atlantic Fishery Management Councils. More importantly, as the lobster fishery continues to shift its operations further offshore it will increasingly interact with other federally managed fisheries, and the species targeted in those fisheries. It is important that we understand patterns of effort in these fisheries so that we can better estimate bycatch and consider other overlaps between the lobster fleet and the fisheries and habitats we manage. As noted in the draft addendum, an eventual increase to 100% harvester reporting rate was a goal of Addendum X to the American Lobster FMP, which was approved ten years ago. Now is the time to achieve that goal, at least for federal waters.

Assuming monitoring rate Option C is selected by the Commission, as harvester reporting ramps up over time it seems appropriate to optimize sampling as suggested under Option B. We do not have a strong preference for Sub-Option A or B under Option C, but Sub-Option B appears to reduce administrative burden for vessels that land few lobsters. This seems a reasonable tradeoff between administrative costs and the need to better characterize fishing effort.

On the second question, should current data elements be expanded to collect a greater amount of information in both fisheries, the Council supports Options B and C, which would expand data elements related to depth fished/bait type/soak time (Option B) and number of traps per trawl and number of buoy lines (Option C). As you know, the Council manages the Atlantic herring fishery in federal waters, and herring is an important source of bait for the lobster fishery. It would be very informative to our management of Atlantic herring to have a clearer understanding of bait use by area and season. We suggest distinguishing between fresh, salted,

and frozen herring when collecting data on bait usage. Information on the number of traps and the number of traps per trawl will help us to estimate the seabed effects of the lobster fishery as we revise our habitat impact modeling in the coming years. Information on the number of buoy lines will inform estimates of risks to protected resources, an issue that is of concern to both the Council and the Commission.

On the third question, at what scale should spatial information be collected, the Council supports Option B, NMFS Statistical Area and LCMA, at a minimum. Because vessels are permitted by LCMA this data element seems elemental to the reporting program. However, higher resolution spatial data including distance from shore (Option C) and reporting catch by ten-minute square (Option D) would allow users of lobster fishery data to more accurately attribute effort to specific management areas. Maine already collects distance from shore data, and continued collection of this information seems prudent to track the seasonal shifts in effort by distance from shore, as well as increasing use of the portions of LCMA 1 that lie further from shore. In addition, the Council supports Option E as a pilot program. Overall, the Council supports combining all of the options in this section to obtain the most comprehensive understanding possible of the spatial distribution of lobster fishing effort.

In general, the Council supports adopting any recommendations for improved monitoring in federal waters (Section 5.0). While most of the species we manage occur in both state and federal waters, overlap between the lobster fishery and Council-managed fishing effort and Council management areas is most likely in federal waters.

Overall, the Council appreciates the Commission's work on these addenda. We have collaborated closely with you and the American Lobster Technical Committee during development of our Deep-Sea Coral Amendment, and additional data would have improved our analysis of potential effects on the lobster fishery.

Sincerely,