



New England Fishery Management Council

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Draft

Mr. Samuel D. Rauch, III
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Rauch:

Thank-you for the opportunity to comment on the Draft National Bycatch Reduction Strategy. This strategy is intended to guide and coordinate efforts to reduce bycatch and bycatch mortality. The six overall objectives, and the specific strategies underlying each, are straight-forward and easily understood. We have no comments on these elements of the strategy.

The Council is concerned, however, that there does not appear to be any high-level direction on the relative importance of different types of bycatch. The strategy will lead to the development of national and regional action plans to further reduce bycatch. Given the current budget and management climate, it is unlikely that there will be sufficient time or resources to address all bycatch issues at the same time. Regional action plans will need to face these limitations. The strategy should provide guidance on how to rank the relative importance of bycatch so that regional plans are consistent with national priorities. As an example, from a national perspective reducing bycatch of endangered or threatened species might deserve more immediate attention than reducing bycatch of a commercially important, overfished stock – even though a region may reach a different conclusion. As drafted, the strategy is silent on these tradeoffs.

Please consider our comments as you prepare the final strategy. Please contact me if you have any questions.