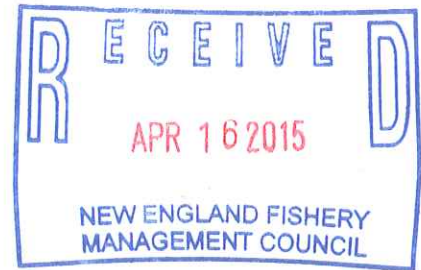




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April 16, 2015



Via Electronic Mail

Terry Stockwell, Chairman  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

RE: Observer Committee Report

Dear Chairman Stockwell:

These comments are submitted on behalf of the Ad Hoc Pelagics Coalition, comprised of Gloucester-based participants in the Atlantic sea herring fishery. At its upcoming meeting in Mystic, Connecticut, the New England Fishery Management Council will receive the Observer Committee's report on the Industry-funded Monitoring ("IFM") Omnibus Amendment. Among other things, the Council will consider actions on alternatives for the herring fishery to be considered in the IFM Amendment.

In terms of potential additions to the current set of alternatives, the Council will be considering provisions that would allow for electronic vessel monitoring systems, dockside monitoring, and less expensive at-sea monitors (in lieu of observers). The Coalition strongly supports the addition of these alternatives for further development in the Omnibus IFM Amendment. The Council deserves credit for focusing on the costs of the monitoring programs to be developed and for directing the IFM Fishery Management Action Team ("FMAT") to work with the industry to develop more realistic cost information and explore ways to reduce costs. These alternatives can help meet those objectives.

That said, consistent with the position it and, indeed, all full-time directed herring industry members have long taken, the Coalition opposes heightened monitoring requirements for this fishery beyond what is required to garner precise and accurate bycatch data and meet reasonable management objectives. Those are not the objectives of some, if not many, public supporters of the most extreme measures in the Amendment, including 100% observer coverage and no exemptions when observer coverage is unavailable. To some, these are just means toward the end of eliminating the mid-water trawl sector of the herring fishery.

Any monitoring program that is implemented must be practicable. That is to say, the measures must be cost-effective and reasonably calculated to obtain necessary information without unduly burdening the fishery's ability to obtain optimal yield from the herring resource on an ongoing basis. In the Coalition's view, there is no possibility that a 100% coverage requirement

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or any alternative that disallows a vessel from making a trip when coverage is unavailable can meet this test. If not patently unlawful, these alternatives represent poor policy and a diversion of monitoring resources that could be used to improve management of other fisheries. These costly measures also drain resources from already strapped fishing communities such as Gloucester that are reeling from the most recent groundfish reductions. Therefore, the Coalition respectfully requests that these alternatives be dropped from further consideration.

As mentioned, we very appreciative of the Council's focus on cost-minimization. Further, the herring industry as a whole fully appreciates the Council's and public's legitimate concerns regarding the potential for bycatch in this fishery. We look forward to working with you, the Observer Committee, and the Council as a whole in developing a reasonable monitoring program that we believe will prove the industry's long-standing contention that the herring fishery is one of the "cleanest" and most responsible fisheries not just in New England, but in the nation.

Thank you very much for your kind attention to these comments.

Sincerely,

/s/ Shaun M. Gehan

*Counsel for the Ad Hoc Pelagics Coalition.*