



New England Fishery Management Council

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John Pappalardo, *Chairman* | Paul J. Howard, *Executive Director*

#2

February 27, 2009

Dr. Nancy Thompson, Director
Northeast Fisheries Science Center
National Marine Fisheries Service
166 Water Street
Woods Hole, MA 02543

RE: Comments on Northeast Fisheries Observer Coverage Priorities for 2009

Dear Nancy:

The Council's Interspecies Committee reviewed the proposed priorities for observer coverage in the northeast for 2009 and is providing the following comments on behalf of the Council.

The Council does not feel it has the expertise to recommend specific changes in terms of the number of observer days that might be re-assigned from one fishing mode to another. However, it is concerned that too many observer days might have been allocated to the Northeast large-mesh mixed trawl fishery that could be better used to cover other fishing modes, particularly if the activity for this fishing mode substantially decreases under the proposed interim management measures for the multispecies fishery. The Council, therefore, requests if there are excess days or unused days under any fishing mode, that these days be reassigned to cover fishing modes that catch small mesh species such as whiting and herring. The reason for this recommendation is that the Council is developing an amendment to the herring FMP and also plans to develop an amendment to the Small Mesh Multispecies FMP that includes whiting. Bycatch by vessels in these fisheries has been identified as a major concern by a number of groups.

Thank you for considering this Council's comments. Please contact me if you have any questions.

Sincerely,

Paul J. Howard
Executive Director

cc: Patricia Kurkul, NMFS
Daniel Furlong, MAFMC

