



March 1, 2016

Eileen Sobeck
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East-West Highway
Room 14636
Silver Spring, MD 20910

Dear Ms. Sobeck,

Today NOAA Fisheries will begin requiring our groundfish fishermen to pay the cost of the at sea monitoring (ASM) program for the northeast groundfish sector management program.

On behalf of Northeast Seafood Coalition (NSC) fishermen that are members of the Northeast Fishery Sectors, NSC wants to make sure you are acutely aware that the NSC does not support the industry funding requirement. NSC believes such a requirement at this present time when the fishery is facing a groundfish disaster declared by your Department, with historically low quotas, will exacerbate, not mitigate, the disaster. In addition, we do not support the design of the existing program which utilizes an outdated method for calculating coverage rates.

NSC acknowledges that in order to operate through the remainder of this current 2015 fishing year, and likely next fishing year, the sectors will need to establish and submit to the Agency pre-negotiated contracts with an ASM provider. We want to make sure you are aware that when a sector complies with these requirements, such compliance should not be construed by the Agency as indicating the fishermen's ability to cover such costs or their support for the current ASM program.

Lastly, the NSC has been actively engaged in recent policy discussions to reform the inefficient ASM program that has been in existence now since sectors were implemented in 2010. During the current 2015 fishing year the Agency continues to use an outdated process to calculate coverage rates. However, the upcoming 2016 fishing year offers an opportunity to learn from the previous five years of sector operations to make crucial improvements to the ASM program. NSC strongly encourages the Agency to approve and implement these policy changes as recommended by the Council in Framework 55 for the 2016 fishing year, and we strongly encourage the Agency to work collaboratively in the coming days on administrative and policy improvements that are still needed for the program.

Sincerely,

A handwritten signature in blue ink that reads "Jackie Odell".

Jackie Odell, Executive Director

Cc: John Bullard, Regional Administrator, NOAA Fisheries Northeast Regional Office
Tom Nies, Executive Director, New England Fishery Management Council
Elizabeth Etrie, Program Director, Northeast Sector Service Network (NESSN)

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