

United States Senate

WASHINGTON, DC 20510

July 26, 2011

Mr. Eric Schwaab
Assistant Administrator, NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910

Dear Mr. Schwaab:

We are writing to urge you to make several commonsense adjustments in support of New England groundfish fishermen that are consistent with recent New England Management Review recommendations made by the Touchstone Group.

We encourage the National Marine Fisheries Service to pursue these program adjustments within a broader strategy of industry engagement and we hope these modifications to the sector management system will help the region's fishermen achieve greater predictability in their business and harvesting practices. Effective fisheries management rests on reliable processes that promote stability for both fishing businesses *and* managers. Consistent with national fisheries policy, these adjustments will provide significant benefits both *to* fishermen and *for* the resource, as well as help the New England groundfish fishery move further down the path to a sustainable ecological and economic future.

Reduce Monitoring Costs: At-sea monitoring costs can and should be reduced. The current rates in New England for at-sea monitors in the sector system (\$585-\$675/day) far exceed those typical in catch share programs in other regions (\$365/day). An immediate transfer of responsibility for paying these costs will be difficult for the industry to absorb and a transition period would provide an opportunity to explore options for cost reduction. The sooner lower rates can be established, the more effectively the industry will be able to plan for the future. *We urge you to explore ways to achieve a more affordable at-sea monitoring system with costs comparable to other regions of the country and to phase in industry assumption of these costs.*

Evaluate Input Controls: In a hard Total Allowable Catch management system, effort controls previously in place may no longer be merited. Whenever possible, fishermen should have the flexibility to fish more selectively and efficiently. For example, where supported by science and appropriate management precautions, we encourage the agency to allow access to rebuilt stocks in areas that are currently closed to groundfish fishing and to incentivize the use

of more selective gear types. *We urge you to carefully evaluate existing regulations to be sure they remain relevant and necessary for the protection of the resource and allow increased flexibility wherever possible.*

Information Transparency: The Touchstone report highlighted the need for improved information management, noting that “outdated and fragmented systems...delay the efficient flow of data into the management process. Many see this issue as a high priority given the increased role quota management and stock assessments will play in the process.” *The data management and sharing systems at NMFS must be upgraded and integrated so that accurate ACE reconciliation can occur in real time thereby reducing the potential holdback of allocation in the following fishing year.*

Speed Delivery of Socioeconomic Data: As the management review says, socioeconomic data needs to be a more visible and meaningful part of the management process so that economic impacts of management actions can be better understood. *We urge you to speed up the delivery of socioeconomic information to the Council to increase transparency and improve decision-making. We also urge you to build capacity so that socioeconomic data can be timely and effectively incorporated into the management process.*

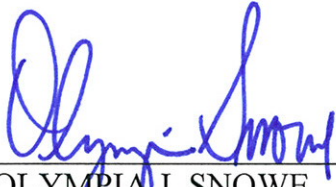
Grant Access to Unused Quota: There is increasing evidence that many New England fishermen are fishing conservatively and leaving much of their quota unused. Consistent with many catch share fisheries around the world, the New England sector program allows up to 10 percent of unused quota to be carried over to the next year. Where biologically appropriate, carryover levels should be increased, allowing increased flexibility in fishing behavior. *We support the effort to reward good fishing practices by allowing carry-over greater than 10 percent of underutilized quota into the following fishing year where biologically appropriate.*

Analyze the Impact of Permit Banks: NOAA and Congress have provided \$6 million for the purpose of “mitigating adverse impacts associated with catch share programs and to help preserve fishing opportunities for small scale fishermen operating in small fishing ports that may otherwise be disproportionately negatively affected by the consolidation of fishing effort that often follows implementation of catch share programs.” This mitigation is occurring partially through the creation of NOAA-funded, state sponsored permit banks. *NOAA should evaluate the effectiveness of the intended mitigation, as well as any adverse impacts on fishermen or communities not eligible for the benefits of these permit banks.*

Involve Industry in Leadership Selection: Leadership has been a concern to industry in New England and the future leaders of the regional office and science center will be critical elements of improving the working relationship between industry and NMFS. The Touchstone report recommended increasing leadership outreach to external partners to improve working relationships. *We support early and meaningful involvement of industry members in the identification of potential candidates for key leadership positions in the region.*

Thank you for considering these suggestions, and we stand ready to work with you to move them forward in an expeditious manner.

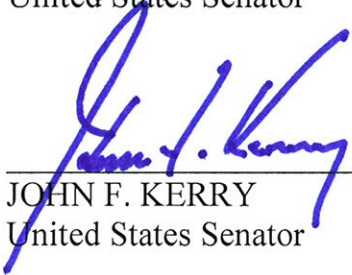
Sincerely,



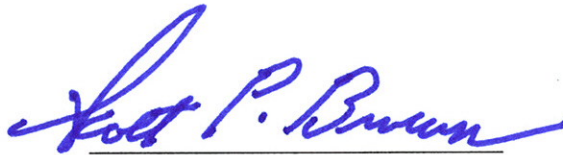
OLYMPIA J. SNOWE
United States Senator



SUSAN M. COLLINS
United States Senator



JOHN F. KERRY
United States Senator



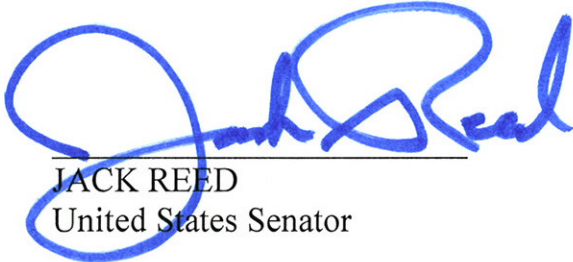
SCOTT P. BROWN
United States Senator




KELLY AYOTTE
United States Senator



JEANNE SHAHEEN
United States Senator



JACK REED
United States Senator



SHELDON WHITEHOUSE
United States Senator