

# NORTHEAST SEAFOOD COALITION

December 27, 2011

Patricia Kurkul  
Regional Administrator  
NMFS, Northeast Regional Office  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Pat:

In reference to your August 15, 2011 letter to Gillnet Vessel Owner/Operators, NSC and its membership take very seriously the groundfish fishery's responsibilities under the Marine Mammal Protection Act and the need to minimize the incidental take of harbor porpoise in the gillnet fishery.

With this in mind, we are writing to request the Agency convene a meeting or workshop of the Harbor Porpoise Take Reduction Team as soon as possible. We feel it is important to take an open and proactive approach to review and discuss the preliminary analyses which may suggest the bycatch rates in the Gulf of Maine and Southern New England areas may be above the target rates in the first management season. We also believe it is critical to consider the latest information concerning bycatch estimates, pinger technology and proactive steps already taken to improve fishery compliance.

For example, it has come to our attention that there are issues to consider regarding pinger sound frequency and battery life that may have direct benefits to both pinger effectiveness and fishery compliance.

We are also aware that gillnet fishermen based out of the port of Gloucester have been leasing new generation pinger technology over the past year from the Gloucester Fishing Community Preservation Fund ("Gloucester Permit Bank") in a concerted effort to improve compliance as well as the efficiency and effectiveness of harbor porpoise bycatch reduction. This approach may have much broader application to gillnet fishermen throughout the region.

Finally, it has further come to our attention that there may be issues to consider regarding the Agency's current harbor porpoise bycatch estimation methodology. To the extent current bycatch estimates represent an extrapolation from metric tons of landed catch by gillnet fishermen, we feel a full and open reevaluation of this methodology is warranted with an eye toward improving the accuracy of such estimates. We all share the goal of minimizing harbor



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porpoise bycatch in the gillnet fishery and so we feel that such a meeting or workshop would be extremely timely and productive.

Thank you for your consideration of our request. As always, we appreciate the opportunity to work with you and the Agency on this and other issues involving management of the groundfish fishery. We look forward to your response.

Sincerely,



Jackie Odell

Executive Director

Cc: Daniel Morris, Deputy Regional Administrator  
Mary Colligan, Assistant Regional Administrator, Protected Resources Division