



CITY OF NEW BEDFORD

JONATHAN F. MITCHELL, MAYOR

August 8, 2013

John Bullard
Regional Administrator, Northeast Region
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Re: Observer Requirement for Sector Vessels Accessing Closed Areas

Dear John:

I write to express my grave concern regarding the requirement in the Proposed Rule to Allow Sector Vessels Access to Year-Round Closed Areas, 78 Federal Register 41722, that the industry fund 100% of at-sea monitoring (ASM) coverage.

As you know, the draconian cuts in the groundfish quotas for the 2013 fishing year threaten the very existence of the groundfish industry in the Northeast and will have severe consequences on New England fishing ports, including New Bedford. One bright spot since last summer's announcement of the reduced quotas was NOAA's stated willingness to help "soften the blow" by allowing sector vessels to submit requests to fish in sections of closed areas.

The requirement that industry fund 100% observer coverage in the closed areas renders this bright spot a mirage. Because the cost of observers is so high -- often exceeding \$500 a day -- it seems likely that many boat owners will conclude that fishing in the closed areas is cost prohibitive, and they will reluctantly choose not to fish there.

Given the gravity of the fishing crisis, I ask that NOAA strive to make access to the closed areas a real option, whether by funding the observers with federal dollars or reducing the observer requirement. Retaining the requirement that industry fund 100% coverage in the closed areas would send the signal that NOAA is not serious about mitigating the devastating effect of the groundfish cuts and that fishermen are not to be trusted. I suggest there is a better course.

Thank you for your consideration.

Sincerely,


Jon Mitchell