



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930

December 14, 2021

Eric Reid
Chairman
New England Fishery Management Council
50 Water Street Mill 2
Newburyport, MA 01950

Dear Eric:

The total target level of at-sea monitoring (ASM) coverage required for Northeast multispecies sectors in fishing year 2022 will be 99 percent of all sector trips subject to the at-sea monitoring program. An ASM target coverage level of 99 percent is the highest level I am allowed to set under the regulations. This target level helps address bias, supports the collection of information and data that will help make future determinations of appropriate ASM coverage levels, and provides the additional benefit of preparing our ASM infrastructure for higher required coverage, if Amendment 23 is approved. I am announcing my determination now to allow time for us to support increased coverage, for monitoring providers to hire and train additional staff, for sectors to negotiate with providers to contract for services, and for industry members to make decisions for fishing year 2022. In the event that Amendment 23 is not approved, I may re-evaluate my coverage level determination if public comments on the Amendment or our Amendment 23 decision merit revisiting our 2022 target coverage level determination.

Each year, we complete an analysis to determine the level of ASM coverage required to estimate discards for each Northeast multispecies stock with no greater than a 30-percent coefficient of variation (CV). However, as a result of the COVID-19 health emergency, gaps in available observer and monitoring data for fishing year 2020 prevented us from completing a CV analysis to inform the 2022 target coverage level, which normally would have relied on data from the 2020 fishing year. Since fishing year 2020, in addition to the CV analysis, we have also considered the four analyses of bias developed by the Groundfish Plan Development Team (PDT) and the peer review by a sub-panel of the Council's Scientific and Statistical Committee (SSC)¹. I previously determined in fishing years 2020 and 2021 that it would be inappropriate to base the target coverage level solely on the results of the CV analysis, and instead set the fishing coverage level target at a level that aimed to address bias to the extent practicable. Similarly, the

¹ The SSC sub-panel concluded that "(T)he set of studies provide substantial support to conclude that there are differences both in discarding behavior and in fishing behavior between observed and unobserved trips. The analyses suggest that discard estimates from observed trips should not be used to estimate discards from unobserved trips, or at minimum not without some adjustments. In addition, this suggests it is not appropriate to determine a level of observer coverage that should be deployed by considering the coefficient of variation of discard estimates from observer coverage since observed trips are not representative of unobserved trips."



2022 target coverage level must continue to account for bias beyond previous coverage levels in light of the PDT's and SSC sub-panel's conclusions. The precise level of coverage under 100 percent that sufficiently removes or reasonably accounts for bias remains unknown. There is still not sufficient information available to make this determination, and to date both we and the PDT have been unable to develop a new method or analysis for calculating this precise target coverage below 100 percent.

We expect to continue to have funding available to reimburse industry for all of its at-sea monitoring costs in fishing year 2022, including sector costs for electronic monitoring. If you have further questions about the fishing year 2022 ASM coverage target, please contact Sarah Bland, Assistant Regional Administrator for Sustainable Fisheries, at (978) 281-9257.

Sincerely,

A handwritten signature in blue ink that reads "Michael Pentony". The signature is written in a cursive style with a large, sweeping initial "M".

Michael Pentony
Regional Administrator