

In a letter to the council, groundfishermen from across New England criticized the process for developing the amendment by framing the issue within a simple cost/benefit analysis.

They claim the process for fashioning the amendment still has not identified what the revised monitoring programs will cost the groundfish industry that ultimately will be responsible for paying for it.

"That's an extremely important issue, since they're the ones paying for it," said Jackie Odell, the executive director of the Gloucester-based Northeast Seafood Coalition. "These are industry-funded programs."

The fishermen also claim the development process has failed to proffer any tangible benefits to the industry in return for what are expected to be higher costs in the implementation of new monitoring regulations and potentially more expansive monitoring levels.

"The purpose and need of Amendment 23 clearly identifies 'maximizing the value of collected catch data and minimizing costs for the fishing industry and the National Marine Fisheries Service' as critical parts of this action," according to a letter signed by 86 groundfishermen from Massachusetts, Rhode Island, New Hampshire and Maine. "So far, we have not seen an attempt to relate the additional costs of monitoring to any measurable benefit to our businesses for any of the alternatives."

The council has said the amendment is necessary to "improve the reliability and accountability of commercial groundfish catch reporting," including discards and landings. The council said it also seeks to improve the accuracy of collected data while creating "fair and equitable catch reporting requirements for all commercial groundfishermen."

The amendment, according to the council, seeks to provide "sector monitoring tools that explore options for human at-sea monitors, electronic monitoring, dockside monitoring and maximized retention of catch" designed to help improve ever-controversial stock assessments.

In their letter to the council, the groundfishermen question whether increased levels of monitoring necessarily translate into more accurate stock assessments.

"We hear theories that increased monitoring will improve stock assessments," the fishermen wrote. "But we have learned from Amendment 16 that higher levels of monitoring do not necessarily result in improved stock assessments. Certainly we have not seen any improved ability to estimate stock size."

The fishermen also point out that the infusion of federal funds in the past two seasons to alleviate or mitigate the industry's burden for paying for at-sea monitoring should not be considered a long-term solution.

"These federal funds should not be wasted on increased monitoring in the short-term with no quantifiable benefit," they wrote in the letter to the council. "Federal funds cannot be considered to offset the costs of Amendment 23 alternatives."

Once the council has finalized its range of alternatives, it will be up to the groundfish plan development team to complete a draft environmental impact study — perhaps in time for the council's vote at its September meeting here in Gloucester.

If approved, the council then would select its preferred alternatives in advance of a public hearing and comment period in November.

Final action, according to the council's own projected timeline, could come in December.

"At this point in the process, we hear there is a focus on finishing rather than on developing informed and sound alternatives," the fishermen wrote to the council. "As businesses that will be directly impacted by this action, we are more concerned that the council focus its effort on getting the alternative right than simply completing the action."