



February 8, 2024

Mr. Michael Pentony
GARFO Regional Administrator
NMFS/NOAA Fisheries
55 Great Republic Drive
Gloucester, MA 01930

Dear Mike,

The Sturgeon Bycatch Fishery Management Action Team/Plan Development Team (FMAT/PDT) developed four packages of alternatives that are designed to reduce Atlantic sturgeon bycatch. The packages use time/area closures and/or gear modifications based on the range of alternatives approved by both Councils in the fall of 2023. Low-profile gillnet gear mentioned below is defined based on research by Fox et al. (2012, 2013, and 2019) and He and Jones (2013) in New Jersey:

- Mesh size ranging from 12 to 13 inches,
- Net height ranging from 6 to 8 meshes tall,
- Net length of 300 feet,
- Tie-down length of at least 24 inches to 48 inches max,
- Tie-down spacing of 12 feet,
- Primary hanging ratio of 0.50,
- **Twine size 0.81mm, and**
- Net is tied at every float to keep float line down.

The Harbor Porpoise regulations require 0.90 mm minimum twine size for large-mesh gillnets ($\geq 7''$) in Mid-Atlantic management areas during applicable months (January-April)¹. The New England and Mid-Atlantic Fishery Management Councils request that NOAA Protected Resources Division consider an exemption of low-profile gear twine size requirements year-round, including when Harbor Porpoise regulations are in place (e.g., create an exemption for 0.81 mm twine size used in low-profile gillnet gear).

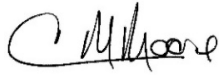
Any requirement of low-profile gear for the monkfish and spiny dogfish fisheries includes a proposed delay to allow additional time for the Harbor Porpoise Take Reduction Team to consider changes to minimum twine size requirements (and also for gear manufacturers to

¹ Harbor Porpoise Take Reduction Plan information: <https://www.fisheries.noaa.gov/new-england-mid-atlantic/marine-mammal-protection/harbor-porpoise-take-reduction-plan>

produce the gear for commercial use). The Councils are expected to take final action on any time/area closures and/or gear modifications during their April 2024 meetings with expected implementation by end of 2024.

Please let us know if you have any questions or would like any additional information.

Sincerely,



Dr. Christopher M. Moore
Executive Director, Mid-Atlantic Fishery Management Council



Dr. Cate O'Keefe
Executive Director, New England Fishery Management Council

cc: Lynn Lankshear, NOAA Protected Resources Division