

**From:** Lou Goodreau  
**Sent:** Tuesday, August 28, 2018 11:23 AM  
**To:** Katie Pohl <[katherine.pohl@noaa.gov](mailto:katherine.pohl@noaa.gov)>  
**Cc:** Kevin King <[Kevin.M.King@uscg.mil](mailto:Kevin.M.King@uscg.mil)>; Tom Nies <[tnies@nefmc.org](mailto:tnies@nefmc.org)>; Chris Kellogg <[ckellogg@nefmc.org](mailto:ckellogg@nefmc.org)>  
**Subject:** RE: Omega Gauge

Hello Katie, if OLE has the authority, through Secretarial action, to include the use of the Omega Gauge in the NE regulations, that would be the most efficient way to implement it.

Amendments require scoping (to determine the purpose of the amendment), at least one if not two series of public hearings, interspersed with PDT, Advisors, Committee, and Council meetings. Frameworks, originally designed to change the parameters of existing measures, require at least two public hearings at Council meetings, but may take longer if new measures are added. Finally, once we put use of the Omega Gauge into a management action, whether Amendment or Framework, that makes it more difficult to make future changes without a similar management action.

Also, these would need to be coordinated between the MAFMC and NEFMC, and across 6 FMP's. The specific references are:

- 648.80(f)(2) found in the combined Northeast Multi-species / Monfish regulations
  - Referenced 3 times in section 648.23 of the Mackerel, Squid, Butterfish regulations
- 648.51(a)(2)(ii) in the Scallop regulations
- 648.108(a)(2) in Summer Flounder regulations
  - Referenced in 648.125(a)(2) of Scup regulations (this section may incorrectly reference 648.104..., which is minimum fish sizes, not gear measurement)
  - Referenced in 648.144(a)(1)(ii) of Black Sea Bass regulations (this section may incorrectly reference 648.104..., which is minimum fish sizes, not gear measurement)

A Secretarial action may argue for adding an alternative device, the Omega electronic gauge, to the existing 5 kg wedge, using the existing procedure. I think the key arguments are 1) the Omega gauge allows faster mesh measurement, shortening the total time spent on board and/or allowing the Coast Guard to perform other inspections, 2) the Omega gauge provides at least as accurate measurements as the wedge (I'm hoping that Kevin has more evidence from gauge/wedge comparisons than the three associated with the net tag boardings recently), and 3) Other reasons that may be important to the Coast Guard, GCSE, and OLE.

I believe a Secretarial action would need or want some public review. This may be accomplished by first reviewing the data at Enforcement Committee meetings (one MAFMC, one NEFMC), then presenting the data and wording of the regulatory change at respective Council meetings and/or publishing a 30 day comment period for the regulatory change in the Federal Register.

Thanks, Lou