

# CORRESPONDENCE

Hi David,

I was wondering if you could share this email with Enforcement? My husband and I have had concerns about the pollock stock. We live in Southern Maine, the pollock was historically a vibrant, healthy spawning stock and it used to come close to shore every year, starting in October, and they would slowly move out and be gone by mid-January. It used to be a four-month season. The pollock would first show up around the Isle of Shoals, then Boone island, and the Lightening Grounds, Tanta, Platts, Jeffries Ledge, and Three Dory.

We started to notice back around 2014, that the pollock weren't coming into spawn like they used to. A four-month spawning season has turned into a six- or eight-week spawning season, with a lot less pollock than we used to see. We used to see the pollock in our area, year-round, but now we don't see hardly any pollock at all. We used to catch thousands of pounds of pollock, and now we're lucky if we get 10 fish on a three-day trip. I requested the pollock data below from the National Marine Fisheries Science Center because everybody was wondering where the pollock went. This data set shows landings by trawl gear. From 2000 to 2009, the percentage of large pollock being landed was a high of 45% and a low of 26% of the total pollock landed. From 2012 to 2024 every year the percentage of large pollock landed has gone down. The last 3 years the percentage of large pollock landed is 4% and 5%. These are the lowest percentages for large pollock, in the history of record keeping.

The reason why there are so few large pollock is because fishing vessels are using such small sub-legal mesh size that they are catching the fish before they have had a chance to spawn. The Special Redfish Exemption Program has opened the door to using small sub-legal mesh size and other vessels have followed suit. The captains of these vessels are confident that no one is going to measure the extension and there will be no at-sea-boardings by Federal Enforcement and the Coast Guard. Using a legal mesh size-or not has been the honor system for the past 13 years.

# LNieuwkerk\_Pollock landings by fish size\_JAN 2025

Numbers  

[BY VESSEL SIZE](#) | 
 [BY FISH SIZE](#) | 
 [BY TRAWL GEAR](#) | 
 [BY 6.5" GILLNET GEAR](#) | 
 [BY ALL OTHER GEAR](#)

## TRAWL GEAR TRIPS BY FISH SIZE

FISHING YEAR	FISHERY GROUP*	SMALL/ SUB-LEGAL	MED or SELECT STEAKER	LARGE / UNCL.	TOTAL LIVE MT	# TRIPS†	DAYS FISHED	DAYS ABSENT	FISHING YEAR	FISHERY GROUP*	SMALL/ SUB-LEGAL	MED or SELECT STEAKER	LARGE / UNCL.	TOTAL LIVE MT	# TRIPS	DAYS FISHED		
2000	ALL	38.6%	21.6%	33.2%	6.6%	1,765.5	6,238	35,446	17,450	* ALL = all commercial and research trips inside the EEZ, Groundfish = commercial groundfish trips only								
2001	ALL	32.3%	26.2%	35.7%	5.9%	2,201.3	8,282	44,793	21,992	† This column will contain double counting when >1 one fish size is landed on the same trip								
2002	ALL	25.6%	22.9%	44.2%	7.3%	2,171.1	7,249	36,457	17,525	FY2024 data are not final								
2003	ALL	23.2%	30.5%	41.5%	4.8%	2,410.2	8,456	39,410	18,484									
2004	ALL	25.5%	32.6%	28.3%	13.6%	2,995.4	7,802	41,125	20,341									
2005	ALL	24.0%	33.8%	26.0%	16.1%	3,701.1	9,456	52,105	25,656									
2006	ALL	15.4%	50.7%	30.6%	3.4%	3,708.1	6,915	45,899	22,924									
2007	ALL	21.6%	40.1%	33.9%	4.3%	5,372.7	6,614	50,378	25,865									
2008	ALL	16.1%	41.5%	38.9%	3.5%	5,261.2	6,225	50,062	23,433									
2009	ALL	20.4%	43.2%	28.9%	7.5%	3,773.0	5,839	43,459	21,430									
2010	ALL	28.0%	41.1%	23.6%	7.3%	3,734.3	4,621	36,758	19,058	2010	GROUND FISH	28.0%	41.1%	23.6%	7.3%	3,730.6	4,552	36,650
2011	ALL	24.9%	45.7%	21.0%	8.4%	5,099.0	6,401	50,605	27,394	2011	GROUND FISH	25.0%	45.7%	20.9%	8.4%	5,083.3	6,166	50,100
2012	ALL	30.8%	45.3%	17.7%	6.2%	4,727.6	5,483	57,892	29,597	2012	GROUND FISH	31.1%	45.3%	17.4%	6.3%	4,683.7	5,301	57,400
2013	ALL	37.1%	44.1%	15.5%	3.3%	3,228.1	4,382	43,675	24,083	2013	GROUND FISH	37.1%	44.1%	15.5%	3.3%	3,227.2	4,324	43,500
2014	ALL	47.1%	34.6%	14.3%	4.1%	2,483.5	3,654	29,147	14,956	2014	GROUND FISH	47.0%	34.7%	14.3%	4.0%	2,477.7	3,631	29,050
2015	ALL	56.7%	32.2%	8.9%	2.2%	1,976.6	3,554	28,699	14,263	2015	GROUND FISH	56.8%	32.1%	8.9%	2.2%	1,972.8	3,515	28,400
2016	ALL	46.9%	42.3%	6.9%	3.9%	2,417.4	3,539	34,821	17,086	2016	GROUND FISH	46.9%	42.2%	6.9%	3.9%	2,414.9	3,480	34,600
2017	ALL	55.3%	37.0%	6.0%	1.7%	2,494.4	3,458	31,978	15,287	2017	GROUND FISH	55.3%	37.0%	6.0%	1.7%	2,493.3	3,325	31,700
2018	ALL	54.3%	34.6%	9.0%	2.2%	2,928.5	3,823	29,760	13,407	2018	GROUND FISH	54.3%	34.6%	8.9%	2.2%	2,925.7	3,716	29,500
2019	ALL	32.6%	53.4%	11.5%	2.5%	2,694.2	4,346	32,080	14,429	2019	GROUND FISH	32.6%	53.4%	11.5%	2.5%	2,692.8	4,298	31,900
2020	ALL	33.4%	55.4%	9.3%	2.0%	3,457.4	4,388	39,877	17,618	2020	GROUND FISH	33.4%	55.4%	9.3%	2.0%	3,457.4	4,374	39,800
2021	ALL	40.2%	48.9%	8.2%	2.6%	2,767.7	3,441	34,222	15,201	2021	GROUND FISH	40.2%	48.9%	8.2%	2.6%	2,767.2	3,430	34,200
2022	ALL	45.4%	48.0%	5.4%	1.2%	3,222.2	2,999	26,833	11,853	2022	GROUND FISH	45.4%	48.0%	5.4%	1.2%	3,222.2	2,998	26,800
2023	ALL	53.2%	42.6%	4.0%	0.2%	3,192.5	3,461	27,342	12,651	2023	GROUND FISH	54.0%	41.8%	4.1%	0.2%	2,415.1	2,306	18,600
2024	ALL	43.1%	49.1%	5.2%	2.5%	1,494.0	2,311	19,633	8,719	2024	GROUND FISH	47.5%	43.3%	5.0%	4.1%	727.8	671	5,100

This is the Historical Maine Pollock Landings which can be found on the webpage of the Maine Department of Marine Resources. Here you can see that we had a vibrant healthy pollock resource from 1950-2015. On average, from 2000-2009 fishermen landed 3,000,000 million pounds a year. The last 5 years the pollock landings are under 400,000 thousand pounds a year. We are lucky to see 10 pollock for a 3 day trip.

HISTORICAL MAINE POLLOCK LANDINGS

YEAR	SPECIES	METRIC TONS	POUNDS	POUNDS (millions)	VALUE	VALUE (millions)	PRICE/LB	ADJUSTED PRICE/LB	ADJUSTED VALUE	ADJUSTED VALUE (millions)
1950	ATLANTIC POLLOCK	3152.38	6,949,800	6.9498	\$160,091	\$0.160	\$0.02	\$0.69	\$4,765,015	4.7650
1951	ATLANTIC POLLOCK	2708.77	5,971,800	5.9718	\$207,002	\$0.207	\$0.03	\$0.96	\$5,761,660	5.7617
1952	ATLANTIC POLLOCK	3198.74	7,052,000	7.0520	\$189,899	\$0.190	\$0.03	\$0.76	\$5,326,423	5.3264
1953	ATLANTIC POLLOCK	2555.50	5,633,900	5.6339	\$133,446	\$0.133	\$0.02	\$0.67	\$3,766,249	3.7662
1954	ATLANTIC POLLOCK	2054.46	4,529,300	4.5293	\$105,388	\$0.105	\$0.02	\$0.66	\$2,972,828	2.9728
1955	ATLANTIC POLLOCK	2456.61	5,415,900	5.4159	\$125,103	\$0.125	\$0.02	\$0.65	\$3,543,630	3.5436
1956	ATLANTIC POLLOCK	2533.59	5,585,600	5.5856	\$125,044	\$0.125	\$0.02	\$0.59	\$3,271,593	3.2716
1957	ATLANTIC POLLOCK	1687.18	3,719,600	3.7196	\$97,271	\$0.097	\$0.03	\$0.65	\$2,430,600	2.4306
1958	ATLANTIC POLLOCK	1979.48	4,364,000	4.3640	\$141,155	\$0.141	\$0.03	\$0.75	\$3,277,698	3.2777
1959	ATLANTIC POLLOCK	1673.30	3,689,000	3.6890	\$113,174	\$0.113	\$0.03	\$0.74	\$2,712,326	2.7123
1960	ATLANTIC POLLOCK	1802.90	3,974,700	3.9747	\$106,759	\$0.107	\$0.03	\$0.63	\$2,515,444	2.5154
1961	ATLANTIC POLLOCK	1454.26	3,206,100	3.2061	\$103,355	\$0.103	\$0.03	\$0.72	\$2,302,824	2.3028
1962	ATLANTIC POLLOCK	1165.28	2,569,000	2.5690	\$83,318	\$0.083	\$0.03	\$0.65	\$1,680,503	1.6805
1963	ATLANTIC POLLOCK	1128.81	2,488,600	2.4886	\$73,482	\$0.073	\$0.03	\$0.63	\$1,576,021	1.5760
1964	ATLANTIC POLLOCK	599.35	1,321,336	1.3213	\$44,116	\$0.044	\$0.03	\$0.75	\$987,377	0.9874
1965	ATLANTIC POLLOCK	495.61	1,092,640	1.0926	\$47,162	\$0.047	\$0.04	\$0.92	\$1,005,188	1.0052
1966	ATLANTIC POLLOCK	579.66	1,277,931	1.2779	\$59,635	\$0.060	\$0.05	\$0.88	\$1,126,916	1.1269
1967	ATLANTIC POLLOCK	496.71	1,095,055	1.0951	\$54,723	\$0.055	\$0.05	\$0.96	\$1,049,746	1.0497
1968	ATLANTIC POLLOCK	682.39	1,504,416	1.5044	\$58,103	\$0.058	\$0.04	\$0.69	\$1,031,445	1.0314
1969	ATLANTIC POLLOCK	549.86	1,212,223	1.2122	\$50,209	\$0.050	\$0.04	\$0.67	\$811,724	0.8117
1970	ATLANTIC POLLOCK	367.85	810,966	0.8110	\$49,378	\$0.049	\$0.06	\$0.93	\$755,909	0.7559
1971	ATLANTIC POLLOCK	403.82	890,268	0.8903	\$55,369	\$0.055	\$0.06	\$0.87	\$774,323	0.7743
1972	ATLANTIC POLLOCK	601.39	1,325,834	1.3258	\$92,823	\$0.093	\$0.07	\$0.84	\$1,116,224	1.1162
1973	ATLANTIC POLLOCK	1068.99	2,356,724	2.3567	\$187,118	\$0.187	\$0.08	\$0.80	\$1,881,490	1.8815
1974	ATLANTIC POLLOCK	1630.22	3,594,008	3.5940	\$328,327	\$0.328	\$0.09	\$0.86	\$3,079,225	3.0792
1975	ATLANTIC POLLOCK	2683.80	5,916,759	5.9168	\$547,344	\$0.547	\$0.09	\$0.81	\$4,801,144	4.8011
1976	ATLANTIC POLLOCK	3500.45	7,717,166	7.7172	\$874,133	\$0.874	\$0.11	\$0.80	\$6,157,305	6.1573
1977	ATLANTIC POLLOCK	4846.72	10,685,179	10.6852	\$1,405,744	\$1.406	\$0.13	\$0.86	\$9,165,109	9.1651
1978	ATLANTIC POLLOCK	7015.49	15,466,479	15.4665	\$2,445,942	\$2.446	\$0.16	\$0.97	\$14,991,064	14.9911
1979	ATLANTIC POLLOCK	5959.98	13,139,499	13.1395	\$2,304,685	\$2.305	\$0.18	\$0.88	\$11,517,856	11.5179
1980	ATLANTIC POLLOCK	6129.00	13,512,109	13.5121	\$2,247,223	\$2.247	\$0.17	\$0.86	\$11,624,015	11.6240
1981	ATLANTIC POLLOCK	6219.90	13,712,517	13.7125	\$2,882,458	\$2.882	\$0.21	\$1.07	\$14,640,267	14.6403
1982	ATLANTIC POLLOCK	5445.78	12,005,873	12.0059	\$2,183,236	\$2.183	\$0.18	\$0.83	\$9,915,285	9.9153
1983	ATLANTIC POLLOCK	5040.92	11,113,324	11.1133	\$1,724,382	\$1.724	\$0.16	\$0.67	\$7,430,734	7.4307
1984	ATLANTIC POLLOCK	6582.88	14,512,747	14.5127	\$2,025,078	\$2.025	\$0.14	\$0.56	\$8,162,415	8.1624
1985	ATLANTIC POLLOCK	5618.76	12,387,232	12.3872	\$1,701,591	\$1.702	\$0.14	\$0.54	\$6,742,359	6.7424
1986	ATLANTIC POLLOCK	4965.64	10,947,351	10.9474	\$2,798,608	\$2.799	\$0.26	\$0.93	\$10,174,807	10.1748
1987	ATLANTIC POLLOCK	7058.19	15,560,632	15.5606	\$6,216,374	\$6.216	\$0.40	\$1.30	\$20,159,714	20.1597
1988	ATLANTIC POLLOCK	4433.67	9,774,556	9.7746	\$3,502,810	\$3.503	\$0.36	\$1.09	\$10,697,586	10.6976
1989	ATLANTIC POLLOCK	2785.49	6,140,953	6.1410	\$2,835,515	\$2.836	\$0.46	\$1.47	\$9,014,276	9.0143
1990	ATLANTIC POLLOCK	2569.25	5,664,213	5.6642	\$2,907,161	\$2.907	\$0.51	\$1.58	\$8,967,418	8.9674
1991	ATLANTIC POLLOCK	3162.61	6,972,351	6.9724	\$3,879,213	\$3.879	\$0.56	\$1.69	\$11,787,671	11.7877
1992	ATLANTIC POLLOCK	3412.77	7,523,866	7.5239	\$5,130,825	\$5.131	\$0.68	\$1.98	\$14,927,559	14.9276
1993	ATLANTIC POLLOCK	2528.30	5,573,935	5.5739	\$3,732,562	\$3.733	\$0.67	\$1.94	\$10,827,102	10.8271
1994	ATLANTIC POLLOCK	1394.69	3,074,755	3.0748	\$2,706,542	\$2.707	\$0.88	\$2.48	\$7,613,052	7.6131
1995	ATLANTIC POLLOCK	1317.63	2,904,864	2.9049	\$2,874,447	\$2.874	\$0.99	\$2.63	\$7,642,379	7.6424
1996	ATLANTIC POLLOCK	1178.77	2,598,742	2.5987	\$1,889,808	\$1.890	\$0.73	\$1.99	\$5,173,137	5.1731
1997	ATLANTIC POLLOCK	1530.05	3,373,173	3.3732	\$1,971,567	\$1.972	\$0.58	\$1.49	\$5,026,560	5.0266
1998	ATLANTIC POLLOCK	2119.49	4,672,666	4.6727	\$3,097,611	\$3.098	\$0.66	\$1.64	\$7,679,721	7.6797
1999	ATLANTIC POLLOCK	1618.23	3,567,574	3.5676	\$3,111,134	\$3.111	\$0.87	\$2.07	\$7,401,781	7.4018
2000	ATLANTIC POLLOCK	1793.97	3,955,032	3.9550	\$3,258,044	\$3.258	\$0.82	\$1.89	\$7,469,878	7.4699
2001	ATLANTIC POLLOCK	1563.43	3,446,768	3.4468	\$2,447,862	\$2.448	\$0.71	\$1.69	\$5,826,571	5.8266
2002	ATLANTIC POLLOCK	1341.81	2,958,177	2.9582	\$2,385,568	\$2.386	\$0.81	\$1.92	\$5,666,168	5.6662
2003	ATLANTIC POLLOCK	1852.92	4,084,978	4.0850	\$2,206,167	\$2.206	\$0.54	\$1.26	\$5,130,713	5.1307
2004	ATLANTIC POLLOCK	1900.65	4,190,200	4.1902	\$2,346,892	\$2.347	\$0.56	\$1.23	\$5,165,688	5.1657
2005	ATLANTIC POLLOCK	2385.27	5,258,613	5.2586	\$3,104,506	\$3.105	\$0.59	\$1.20	\$6,332,724	6.3327
2006	ATLANTIC POLLOCK	1668.40	3,678,191	3.6782	\$2,309,060	\$2.309	\$0.63	\$1.20	\$4,417,476	4.4175
2007	ATLANTIC POLLOCK	1927.35	4,249,066	4.2491	\$2,159,728	\$2.160	\$0.51	\$0.95	\$4,039,615	4.0396
2008	ATLANTIC POLLOCK	1843.37	4,063,929	4.0639	\$2,315,971	\$2.316	\$0.57	\$1.01	\$4,118,422	4.1184
2009	ATLANTIC POLLOCK	1379.10	3,040,387	3.0404	\$2,046,629	\$2.047	\$0.67	\$1.22	\$3,705,475	3.7055
2010	ATLANTIC POLLOCK	744.05	1,640,355	1.6404	\$1,502,498	\$1.502	\$0.92	\$1.53	\$2,505,021	2.5050
2011	ATLANTIC POLLOCK	1054.55	2,324,875	2.3249	\$1,919,852	\$1.920	\$0.83	\$1.30	\$3,031,680	3.0317
2012	ATLANTIC POLLOCK	1209.19	2,665,811	2.6658	\$2,526,892	\$2.527	\$0.95	\$1.50	\$3,990,964	3.9910
2013	ATLANTIC POLLOCK	1009.97	2,226,593	2.2266	\$2,560,807	\$2.561	\$1.15	\$1.74	\$3,884,342	3.8843
2014	ATLANTIC POLLOCK	1051.66	2,318,515	2.3185	\$2,878,378	\$2.878	\$1.24	\$1.75	\$4,054,687	4.0547
2015	ATLANTIC POLLOCK	626.44	1,381,059	1.3811	\$1,963,082	\$1.963	\$1.42	\$2.00	\$2,768,987	2.7690
2016	ATLANTIC POLLOCK	475.99	1,049,370	1.0494	\$1,662,861	\$1.663	\$1.58	\$2.20	\$2,305,419	2.3054
2017	ATLANTIC POLLOCK	384.71	848,136	0.8481	\$1,182,332	\$1.182	\$1.39	\$1.87	\$1,589,078	1.5891
2018	ATLANTIC POLLOCK	371.10	818,142	0.8181	\$987,796	\$0.988	\$1.21	\$1.59	\$1,302,120	1.3021
2019	ATLANTIC POLLOCK	221.54	488,416	0.4884	\$638,892	\$0.639	\$1.31	\$1.70	\$829,334	0.8293
2020	ATLANTIC POLLOCK	189.77	418,379	0.4184	\$544,951	\$0.545	\$1.30	\$1.69	\$705,509	0.7055
2021	ATLANTIC POLLOCK	146.43	322,816	0.3228	\$640,053	\$0.640	\$1.98	\$2.18	\$703,800	0.7038
2022	ATLANTIC POLLOCK	166.52	367,106	0.3671	\$667,569	\$0.668	\$1.82	\$1.87	\$687,902	0.6879
2023	ATLANTIC POLLOCK	137.09	302,239	0.3022	\$502,437	\$0.502	\$1.66	\$1.78	\$539,476	0.5395
2024	ATLANTIC POLLOCK	114.15	251,647	0.2516	\$414,651	\$0.415	\$1.65	\$1.76	\$443,779	0.4438
2025*	ATLANTIC POLLOCK	159.55	351,751	0.3518	\$550,731	\$0.551	\$1.57	\$1.57	\$550,731	0.5507

This is a large trawl vessel that is hauling back a net that has red fish in it. You can see the pinkish red blob near the end of the net. A crew member had woven a piece of twine between the extension and the codend before they deployed the net. This is called 'choking off the bag'. They did this so they could use sub-legal mesh in the extension. When they haul the net back and the fish get close to the net reel, they jerked the net reel and then all the fish dump into the codend. Anybody that is on the deck, wouldn't know that the fish were caught in the extension, they would think the fish were caught in the codend. The codend is a decoy. The at-sea-observer doesn't know the codend is a decoy, so they would measure the mesh size in the codend and write it down in their report. In reality, the codend was never actually fishing, it was completely empty, choked off, the entire time that the net was fishing on the bottom.

A private person took this photo from his airplane, and posted the photo on Facebook. I read online, under violations that the captain and the vessel owner got a violation because of this photo. This is the only violation I have ever seen that was about mesh size.



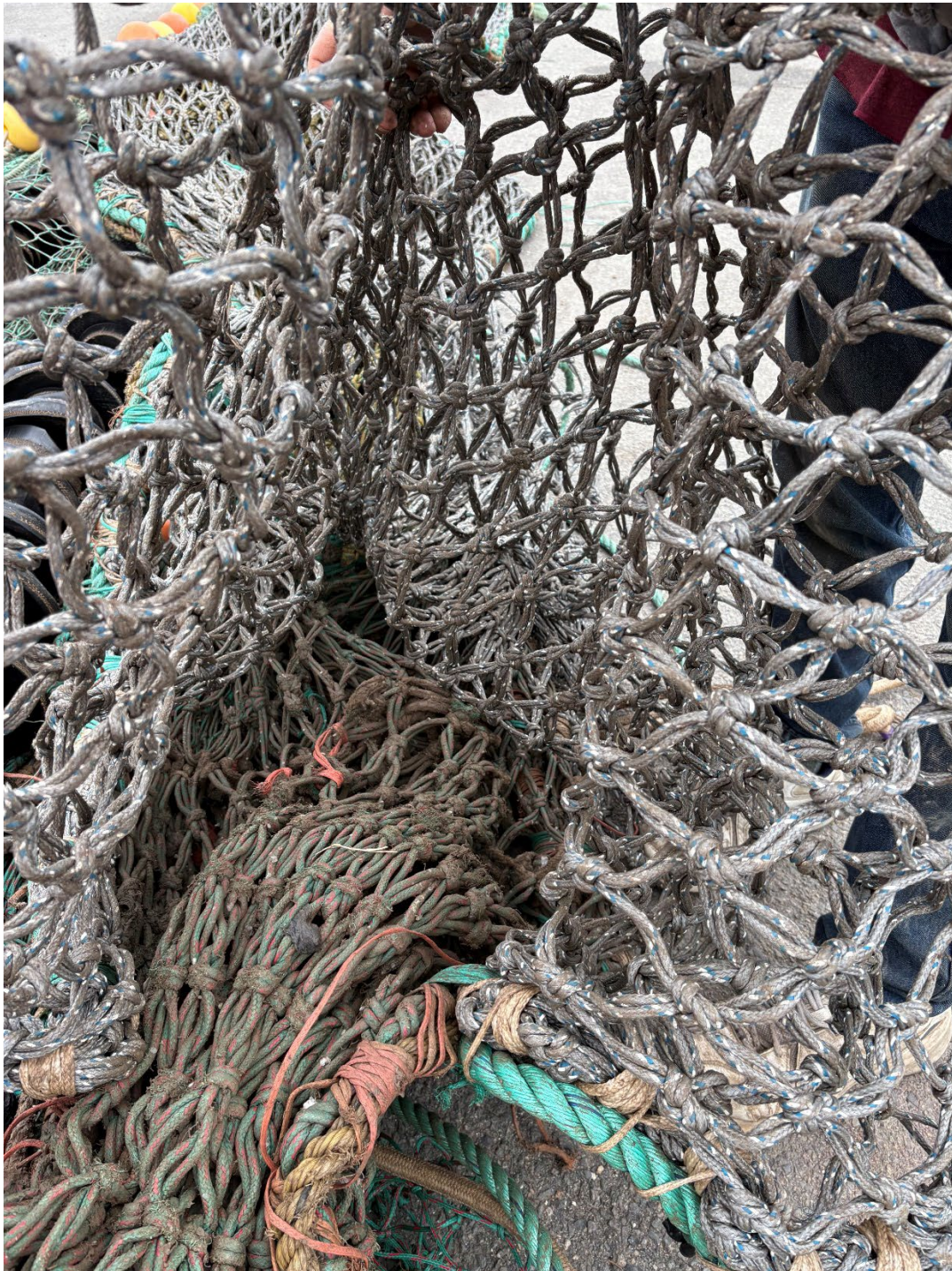
This photo is a picture of the mesh size in an extension that was in public view for atleast 3 weeks, in the net yard. There was confidence by the boat owner that there would be no repercussions if someone saw this. As you can see the mesh size of this extension is 4.5". The legal size of an extension on all ground fish nets, that have a roller frame, is 6"-not 4.5". This extension has sub-legal mesh in it and is a violation of the regulations.



Below is chafing gear on the underside of the extension. The mesh above is part of the extension below that has chafing gear on it. The only reason that there is chafing gear on the bottom of this extension is because the captain and the crew plan to choke off the legal mesh codend. They plan to use the codend as a decoy, and to use the 4.5 mesh above to catch the ground fish. This extension has chafing gear because that is the part of the net that is going to be dragged along the bottom of the ocean. Without chafing gear, the single layer extension would tear, and the fish would escape. This is also considered a liner which is illegal. The extension is only supposed to be single layer tube. It is also supposed to be 6 inches and not 4.5". That is 2 violations.



This is a long extension that was laying in the net yard. Legally this is supposed to be a single mesh tube, but it is actually a tube, inside another tube. It is supposed to be a single mesh tube in order to allow small fish to escape out of the mesh. Escapement is much harder if the tube is double mesh. It is also sub-legal.



The double mesh extension (above) has the codend inside of it. This makes it even harder for escapement of small fish. This part of the net is a triple mesh with the codend inside the middle. Below is a photo of the mesh size in the codend. This is not a redfish exemption net, it is regular groundfish net, so the legal mesh size for the codend is 6.5". The tape measure shows that the mesh sizes is 5.25". The triple liner and the 5.25" codend are both illegal.



**From:** Alex Todd <alextodd207@gmail.com>

**Sent:** Sunday, May 10, 2026 1:56 PM

**To:** comments <comments@nefmc.org>

**Subject:** NGOM enforcement

Dear Chairman Dan Salerno and Executive Director Cate O'Keefe:

I'm writing to ask that the Scallop Committee and the Enforcement Committee take up the issue of long tow times in the Northern Gulf of Maine Scallop Fishery.

I've fished for scallops since 1990, and in the NGOM for over 20 something years. it's been an important area to me. I fished there back before it was known as the NGOM, and I fished on Platts and other areas in the early years of the NGOM when the area was open all year. It's always had its ups and downs, and I was one of the fishermen who lobbied to fix management loopholes so that the next time it started to boom, we could maybe prevent it from going bust. And I'm worried that we're not headed in a good direction, because I saw a lot of boats fishing for a lot longer than they should have to get 200 pounds.

Most years on Stellwagen, I'd get the limit in 1 or 2 tows but especially in the 2025 season and some in this season I witnessed boats fishing for hours on end. Some were boats with dredges that sure appeared to be close to double the size of my eight footer. I know everyone fishes differently, and there may be occasional problems that result in longer tow times. And this year after day 3 it did take longer, but there seemed to be a whole lot of vessels fishing for hours longer than would be necessary to get 200 pounds, even if they were high grading. And that's not good for the resource or for the guys who are playing by the rules.

I know that fishing is different on Georges and in the Mid Atlantic: in those areas guys are encouraged to fish an area hard and then move on to the next one, with the idea that the area that was fished hard will recover to be fished hard again. But we set the NGOM area up because **we know the Gulf of Maine is different**. It's prone to booms and busts, and I worry that if we don't do something to stop guys from towing for hours on end, we're not going to have much of a fishery in future.

I know Government shutdowns the past two seasons have had an impact on the amount of enforcement presence available. But I didn't see these long tow times routinely before 2025. I think if you're speeding and you see a patrol car, You generally slam on the brakes. I think the same thing can be said if you plan to take more than the daily limit.

Alex Todd

F/V Jacob and Joshua

**From:** Paul Theriault <fvterminator@outlook.com>  
**Sent:** Sunday, May 10, 2026 5:18 PM  
**To:** comments <comments@nefmc.org>  
**Subject:** NGOM

Dear Chairman Salerno, Executive Director O'Keefe and members of the Council and Enforcement Committee:

I've been scalloping in the Northern Gulf of Maine for over 40 years. I've watched the fishery evolve first hand from a 400 pound trip limit that lasted 4 or 5 months to a derby with a 200 pound trip limit that now lasts 2 weeks!! I am writing today to express my concerns about what I see as a near complete lack of at-sea enforcement. While I do see a much higher level of enforcement at the dock by the Mass Environmental Police, I don't think they can possibly police all the landing spots involved in this unique fishery. Personally I have not witnessed the USGC conduct a fisheries boarding in over 2 full seasons. When the derby opened this year we were catching our limit in two 15 minute tows with a 7 foot dredge with little to no high grading. At the same time we watched an 80 foot vessel with a heavy 10 foot dredge stay in that same area for hours!! That's not high grading!! Moving forward I hope that NMFS and the Council will give NOAA OLE and Mass DMF the resources they need to ensure that the small boats in the NGOM will continue to have a sustainable fishery well into the future.

Thank you

Paul Theriault  
F/V Terminator

**From:** John Tripp <spindrift4481@gmail.com>

**Sent:** Monday, May 11, 2026 11:01 AM

**To:** comments <comments@nefmc.org>

**Subject:** Fwd: NGOM Fishery

Good morning Chairman Salerno and Executive Director O'Keefe:

My name is John Tripp, I am the owner and operator of my fishing vessel SkyAnnIra. I have participated in the fishery from the 2021 season that occurred in the SW tip of Jeffery's Bank, and then on Stellwagen in the following year.

I am writing in concerns with what the future of the NGOM fishery holds for the mid to small boat fleet from ME, NH, and MA. From what I experienced over the past few years this fishery should have lasted longer at the take rate we were allocated. I did not firsthand see any illegal fishing activity and only heard dock talk and hearsay, there were plenty of guys claiming to see large corporate vessels towing a 15' dredges, and guys talking about at sea transfers. I did not see any 15' dredges nor did I see any at sea transfers. What I did see is experienced scallop vessels and operators towing for hours on end, when less experienced, smaller vessels with smaller dredges like myself make 2-3 10 minute tows to get a limit, while high grading through product. I think if anyone wanted to dig and compare the time spent on the bank by 50+ foot vessels vs time spent on the bank by less than 50 foot vessels through VMS data an educated person could probably come to an assumption as to what activity was occurring.

The NGOM fishery could have been an excellent opportunity to run the scallop fishery differently than the southern New England fishery's. I think we could have harvested in a longer lasting way. As earlier noted I participated in high grading, picking out the biggest scallops and dumping the rest back, which I would imagine increase the mortality rate of the discarded product. This was an unnecessary practice driven by ego, greed, and shortsightedness. Had laws been in place that essentially stated you are required to harvest anything placed on deck over a set size limit, which could be area specific we would handle a lot less product, tow over it for less time, and encourage good stewardship and a more sustainable long lasting fishery.

The fishery changed noticeable after allowing vessels to land below the 42 20 line as well. There was a big change after that season, I don't know if it's because guys were dumping product off below the 42 20 where it could be harvested, or just landing extra product down there where there is very little enforcement. I had an incident this year where a local lobsterman had spoken with a lobsterman from below the 42 20 who stated he had watched scallop boats unloading bag after bag of scallops.

In Gloucester we had shoreside enforcement and they were actively monitoring the scallop fleet as they landed, which was good. As far as it goes for the guys that live below the 42 20 and that is their home port, my home port is 100 miles from Gloucester and I live aboard my vessel for the entirety of the NGOM season, so sacrifices have to be made to participate my most guys.

I would urge the Enforcement Committee to start looking into ways to keep this fishery sustainable, and keep guys honest. I believe strongly that something was occurring out there, I've heard enough reports from big boat crewmen about shady stuff happening on these larger vessels that we need a way to make sure guys are only taking their share. I think this fishery was a missed opportunity to build something that could have lasted a lot longer, and any actions that get taken now will be based on what we've learned from this recent fishery. The NGOM fishery, until the next set of scallops, is talked over now.

I strongly hope the council will at the very least look into guys towing a lot longer than needed. Compare VTR to VMS data, see if things don't add up, talk to the guys that were there and what they saw with their own catch, I will gladly provide all of my trip data that I can.

Attached is a photo of an 8 minute tow 2 days before the season ended in 2025. 8 foot drag, approx 35 baskets. My first and best tow of the season 2026 was less than half of that.

Thanks, John Tripp

**From:** Robert Odlin <robodlin13@gmail.com>

**Sent:** Monday, May 11, 2026 5:01 PM

**To:** comments <comments@nefmc.org>

**Subject:** NGOM scallop

Hello ,  
I fished the NGOM Scallop Fishery since 2017.

This year the scallops were harder to come by than any other season that Stellwagon was open.

I think the 2025 season is when I started seeing the really long days by boats and thought maybe high grading.

But now I've heard that boats were maybe deck loading and translocating the scallops down below 42.20N

No proof just rumors and speculation, which I know you don't need.

But the sharp decline year over year leads me to believe something nefarious may have occurred.

Other speculation was boats would turn off their VMS and sneak into Stellwagon and make tows.

The sharp decline from 25 to 26 seems to be from excessive effort whether it was legal or not, I can't say for certain.

Robert Odlin  
F/V Maria and Dorothy

From: Tad Miller <tadmiller60@gmail.com>

Sent: Monday, May 11, 2026 7:09 AM

To: comments <comments@nefmc.org>

Cc: LT Danny White <daniel.e.white@maine.gov>; SAC James Cassin <james.cassin@noaa.gov>; Togue Brawn <togue.brawn@gmail.com>

Subject: NGOM Enforcement Issues

Dear Chairman Dan Salerno and Executive Director Cate O'Keefe:

My name is Ira Miller, I am a fisherman from midcoast Maine. Most of my family and many of my friends are fishermen as well. I am writing to you now to emphasize the importance of the Northern Gulf of Maine scallop fishery represents to myself, my friends, as well as to our communities here in Maine as well as New Hampshire and Massachusetts. This current NGOM fishery was created by the Councils recognition that this area was historically an area that the "small boat fleet" harvested scallops and they had the foresight at a time when the resource was in trouble to state that the development of any management scheme took into account the fact that when the fishery came back it would be created with the small boats and communities that depend on them along the New England coast as the center piece to any management scheme that was to be developed in the future. I and others were personally involved in fishing for scallops in a small boat many years before this area was created until the stock collapsed. I and some other small boat fishermen weighed in during the process of managing this area to create the fishery as it currently exists now, that being said there is still much more work to be done to try to help to maintain this area as a productive area that will intern benefit many families and communities along the New England coast for years to come. Based on what the last few years have shown, the impact has been very significant for all that have been involved and I'm hopeful that with improved management including upgraded enforcement effort that there will be hope for the future for this important fishery area and all the communities and fishermen that have come to depend on this fishery.

I hope that the Scallop Committee and eventually the full Council will look at how this fishery has been prosecuted to date and move forward with other actions, such as area allocations to help identify areas further north that could add opportunities and add to what has already been a boon to a huge percentage of the fleet (the small daybook fleet at least) that basically had little to no access to the federal scallop fishery for many years due to the stock collapse and changing management scheme's in the federal scallop fishery. I also understand that the NGOM is on the agenda for the upcoming Enforcement Committee meeting and I feel as though this would be a good place to start making some decisions regarding what issues exist currently in the fishery and what can be done in the future to improve what's already been happening. My stepson Jamie Keizer runs my boat in the NGOM fishery. Back three to four years ago when they had longer NGOM seasons I would go to Gloucester to spell him from time to timed give him a few breaks. I had already heard about the larger boats with bigger gear and so on were spending much more time on the grounds than the small boat fleet was. My experience there confirmed that notion. I could see larger vessels that were engaged in towing for scallops as I approached the fishing grounds (at 8 knots, so it gave me lots of time to observe what was going on when I came and went) and were still there towing after I had made three to four tows with a smaller drag than they were towing to get my limit of U-12 scallops towing the same area as I was working. There is no possible way that they could not have also achieved their limit as well, even if they were hydrating they would've left before me. I witnessed this same action every time I went down there. Most fishermen really don't want to say anything regarding another fishermen's possible illegal habits as at times we all potentially depend on one another. My reason for bringing this to your attention is that though many fishermen abide by the law, there's always some that don't and as far as I'm concerned the

impact of over fishing by mainly the larger boats has had a devastating effect on the fishery especially on Stellwagen Bank. The biomass that was there could've easily lasted another couple of years if the rule of law had been followed by in particular the larger boats, not to say that the smaller boats never did anything wrong either. I have many friends that work on large full-time LA boats, but I'd like to point out what I feel is a very natural philosophical difference between the small boat fleet and the larger LA fleet. Most, but not all larger vessels have no ownership ties to the boat they're fishing on and chances are that only some have a family connection to those boats. In the smaller boats the largest percentage of the boats are owner operator, or at least have a family connection to the boats owner. It's a lot easier to not do what's best for the resource and your fellow fishermen without that connection to the past and the impacts that illegal fishing present for your future. It's human nature to take better care of something that you have a personal stake in, rather than something that you may or may not continue to do in the future.

I think there is probably information out there that currently exists, be it through VMS, AIS and etcetera that could confirm or rebuff what I and others are saying by using a set of parameters of small boat versus large to determine if there's a pattern there that shows this to be true. Is it time to consider electronic monitoring to have a better understanding of how the fishery is prosecuted? That is for you to decide. No fisherman thinks that their privacy should be invaded like that and I'm one of them, but if what I suspect is deemed to be happening after proper research then so be it. If not my apologies go out to that portion of the fleet which I deem to be responsible. That being said maybe there's enough validity to these things going on to justify this or other actions. It seems that the common opinion from the people that I talk with is the problems especially on Stellwagen were exacerbated when the rule was changed to allow landing below the 42 20' line. The horse is already out of the barn on these issues and I believe that they have probably had devastating effects on the fishery already. Even if what I have observed has not been the rule, having sufficient enforcement is a cornerstone to maintaining a healthy resource. I would like to see that protecting the resource is a priority for the good of all now and into the future.

Sincerely, Ira Miller  
F/V Julie Ann