

CORRESPONDENCE

Sherie Goutier

From: luke0503 <luke0503@comcast.net>
Sent: Friday, January 17, 2020 4:29 AM
To: comments

I think there should be a 3 cod a day limit

Sent from my T-Mobile 4G LTE Device

Sherie Goutier

From: Brian Curry <bcwashashore@gmail.com>
Sent: Thursday, January 16, 2020 11:55 PM
To: comments
Subject: Re: WGOM Recommend Cod and Haddock Measures 2020 Dear Dr. Quinn and Mr. Nies

Charter boat/for-hire captains and the recreational anglers they serve, continue to be affected by shortened seasons for many species and zero possession of Cod North of the 42 latitude line (GOM). Recreational anglers want a chance to catch Cod.

Presently, we have lost many long time clients to the fleets in RI and CT which has a 10 cod per person possession limit. We need an incentive to reconnect with these anglers and this would be cod.

It is essential, that serious consideration be given to providing the charter/for-hire fleet a cod season for two weeks in May and two weeks in August. This would be our own season and bag limits. Additionally, the current haddock bag limits and season should remain as is.

The fleet ACL can be considered a sub limit to the total ACL for cod. The monitoring of this sub limit can be easily done through the mandatory eVTRs we file.

The private recreational anglers should have their own season and bag limits that work for them.

Captain Brian Curry
Plymouth, MA.

Sherie Goutier

From: Peter Murphy <l-ocharters@comcast.net>
Sent: Thursday, January 16, 2020 9:12 AM
To: comments
Subject: Comment re GOM Cod & Haddock

Dear Dr. John Quinn,

I am writing this comment as a current Trustee and as past V.P. of the Stellwagen Bank Charter Boat Association , as well as on behalf of hundreds of Anglers and struggling Charter Boat owners that fish here in the Gulf of Maine. We have seen a devastating drop in business as a result of Cod restrictions over several years. It appears a much needed two week season in both May and August would perhaps breathe oxygen into our Charter Industry , already on life supportIn closing, I was recently forced to sell my boat due to restrictions.

Your immediate attention to this crisis would be much appreciated.

Sincerely,
Capt. Peter Murphy

Sherie Goutier

From: Jaron Frieden <captainjaron@fishlucky7.com>
Sent: Wednesday, January 15, 2020 7:17 PM
To: comments
Subject: Cod regulations

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. It does not seem fair to limit cod catches to the extent that it is to rod and reel anglers. I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Thank you,

Jaron

Jaron J Frieden
US Coast Guard Licensed Captain

Lucky 7 Fishing Charters
781-710-1190
www.fishlucky7.com

Sherie Goutier

From: Capt. Dave Waldrip <captdave@relentlesscharters.com>
Sent: Wednesday, January 15, 2020 10:46 AM
To: comments
Cc: Michael Pierdinock; info@stelwagenbank.org
Subject: Comments on Recreational Cod and Haddock For 2020 Fishing Season

Dear Tom,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. This seems like a yearly writing exercise pointing out the charter and recreational sector are headed down the path of a zero cod possession or a very small bag limit of one fish for two weeks out of a year. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

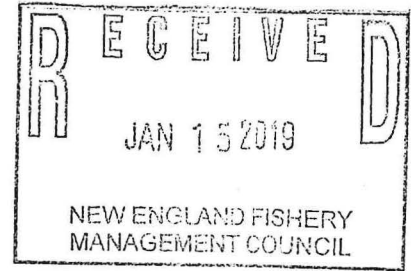
As a charter boat owner and the past president of the Stellwagen Bank Charter Boat Association I have experienced and hear of how these small seasons and bag limits have hurt the charter industry which once thrived from Southern Maine to Plymouth during the spring cod and haddock season. Last year we ended up not being able to land the recreational Sub ACL of GOM Cod and this was a direct result of GARFO not allowing a two week spring season for April or May 2020 after the RAP, Groundfish Committee, Council all approved after the NMFS Science Center stated the recreational sector would not exceed the Sub ACL with two additional weeks.

Charter and Head Boats are small businesses which are being hurt by not being allowed to land any cod. Charter and Head Boats move away from areas where there are large amounts of cod to target haddock. MA DMF has maps to help recreational anglers avoid so called cod hot spots which should reduce cod discards. It is time for the RAP and the NEFMC to develop and have the Council and GARFO approve a separate SUB ACL for charter head boats. With the electronic monitoring (EVTRs) that have been forced upon the charter head boat sector it should not be difficult to track how many fish have been landed by the charter party industry and shut it down once the ACL is reached. I am also requesting NMFS provide a spring season in May of 2020 and a two week period in August. This will assist the GOM for hire fleet a bit especially in the spring when there is no striped bass, fluke, black sea bass to target north of Cape Cod.

I appreciate your time and the opportunity to provide comment prior to the RAP and Groundfish Committee meetings.

Sincerely,

Capt Dave Waldrip
Relentless Charters



January 15, 2020

Dr. John Quinn, NEMFC. Chairman
50 Water Street, Mill 2
Newburyport, MA 01950

RE: WGOM Recommended For-Hire Cod and Haddock Measures for 2020

Dear John.

The Recreational Fishing Alliance, a national 501(c) (4) non-profit political action organization that has been representing individual sport fishermen and the sport fishing industry since 1996, recognizes that the for-hire captains who target groundfish in the Gulf of Maine continue to struggle with the shortened cod season and the one-fish-per-angler cod bag limit. Based on preliminary revised MRIP cod landings for 2018 (zero cod possession) and 2019, the recreational sector's total landings were well below the recreational sub-ACL in 2018 and at the approximate sub-ACL in 2019. Prior revised MRIP results were well below the sub-ACL for both 2018 and 2019. Recreational sub-ACL cod are being left in the water while the for-hire fleet continues to be impacted due to an arbitrarily shortened (two weeks in September, in 2019) season.

The for-hire fleet can, and does, avoid cod when targeting other groundfish species. This is reflected in the reduction in their cod landings in 2018 and 2019. In addition, the new MassDMF cod avoidance maps will be available for 2020, which should further assist in additional cod bycatch reductions.

Charter and party boat customers want cod. Many no longer book trips in the GOM, and instead patronize boats south of the 42 latitude line where the cod bag limit is ten per person. The GOM fleet does have haddock, pollock and redfish, but most clients are not interested unless cod are available as well, so many of these vessels sit idle at the dock.

Therefore, the RFA recommends a cod season for two weeks in May and two weeks in August for the for-hire fleet in 2020, with its own season and bag limits, along with status quo for the haddock season and bag limits. With the revised MRIP results now in, it is time to look at the historical landings by the for-hire fleet in order to estimate a cod sub-ACL that we understand would be lower than the total of the other modes. The mandatory use of eVTRs by the fleet should make it possible for the NEFMC and NOAA to effectively manage the fishery with little difficulty. The eVTRs can be monitored on a real-time basis and the fishery could be closed if the for-hire sub-ACL appears that it would be exceeded. The eVTRs need to be used for more than just estimating effort. Private recreational anglers should have their own season(s) and bag limits that work for them.

Thank you very much for your consideration, and we hope the NEFMC will discuss, and move forward with, this proposal in a timely manner.

Sincerely,

Barry

Capt. Barry Gibson
New England Regional Director
Recreational Fishing Alliance

cc: Mr. Wilbur Ross, U.S. Secretary of Commerce
Mr. Chris Oliver, NOAA
Mr. Mike Pentony, GARFO
Mr. Russ Dunn, NOAA
Mr. Tom Nies, NEFMC
Mr. Terry Stockwell, NEFMC



P.O. Box 1230
Marshfield, MA 02050
www.stellwagenbank.org



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Capt. Ron Savino

Bob Briggs

John Richardson

January 15, 2020

Dr. John Quinn, NEMFC, Chairman
Mr. Tom Nies, NEFMC, Executive Director
50 Water Street., Mill 2
Newburyport, Massachusetts 01950

RE: WGOM Recommended Cod and Haddock Measures 2020

Dear John/Tom:

The charter boat/for-hire captains of the Stellwagen Bank Charter Boat Association continue to struggle with the shortened cod season and the one fish per angler cod bag limit in the WGOM. Based on preliminary revised MRIP cod landings for 2018 (zero cod possession) and 2019, the recreational sector's total landings were well below the recreational sub-ACL in 2018 and at the approximate sub-ACL in 2019. Prior revised MRIP results were well below the sub-ACL for both 2018 and 2019. The Commonwealth of Massachusetts, Division of Marine Fisheries recommended a one-cod bag limit in 2018, yet NOAA was adamantly against the proposal and a zero possession cod limits was implemented, resulting in cod landings that were well below the sub-ACL. We are leaving cod in the water while the for-hire fleet struggles.

The for-hire fleet moves to other areas if cod are encountered while targeting haddock during closures. This is reflected in the reduction in cod landings in 2018 and 2019. Unless the cod season is open (such as the short period of time in September, 2019), we avoid cod when we target haddock. The new MassDMF cod avoidance maps will be available for 2020, which should further assist in additional cod bycatch reductions while we target other groundfish species.

Ultimately, the for-hire fleet is struggling. Our clientele wants cod. Many customers no longer book trips in the GOM, and instead patronize boats south of the 42 latitude line where the cod bag limit is ten per person. Yes, we have haddock, pollock and redfish in our waters, but most clients are not interested unless cod are available as well. Our historical and preferred cod season is April and May, when there are few



P.O. Box 1230
Marshfield, MA 02050
www.stellwagenbank.org

other species to target as striped bass and bluefin tuna have not yet arrived in our waters.

Therefore, we recommend a cod season for two weeks in May and two weeks in August for the for-hire fleet, with our own season and bag limits, along with status quo for the haddock season and bag limits. With the revised MRIP results now in, it is time to look at the historical landings by the for-hire fleet in order to estimate a cod sub ACL that is significantly less than the other modes (recreational angler, boat and shoreside). The mandatory use of eVTRs by the fleet should make it possible for NOAA to manage the fishery with little difficulty. Monitor our eVTRs and shut us down early if need be so that our sub-ACL will not be exceeded. The eVTRs need to be used for more than just estimating effort. Private recreational anglers can have their own season(s) and bag limits that work for them.

If you have any questions or comments, please contact us at the email below.

Very truly yours,

Capt. Mike Pierdinock
SBCBA, President
cpfcharters@yahoo.com

Capt. Paul Diggins 
SBCBA, Vice President
paul@bostonfishing.com

cc: Wilbur Ross, Secretary of Commerce
Chris Oliver, NOAA
Mike Pentony, GARFO
Russ Dunn, NOAA
Ron Amidon, MassF&G
Dan McKiernan, MassDMF

Sherie Goutier

From: Roland Guyette <captainrolo@off-shorecharters.com>
Sent: Tuesday, January 14, 2020 6:44 PM
To: comments
Subject: GOM Cod fishing

I enjoyed many years of Codfish and Haddock fishing in the stellwagon bank and GOM
This should not be denied to generations to come by overfishing but at the same time not be denied to the current
recreation fishermen when they sustain the population growth. Unlike the Commercial fishing fleet which discard levels
of juvenile fish are dieing daily

captainrolo@off-shorecharters.com
Roland J Guyette

Sherie Goutier

From: PAUL CRONIN <twigpc@aol.com>
Sent: Tuesday, January 14, 2020 2:09 PM
To: comments
Subject: GOM Cod recreational catch

Dear Mr. Nies,

I am in favor of the added 2 week season for cod, with the retention limit of one fish per person, per day.

I would like to see two weeks in May of the 2020 fishing year.

I would also like to see the two weeks allowed in September, moved to August. This would be a better weather fishing window for the recreational angler.

Thanks for your consideration,
Paul Cronin
Norwell, Ma

Sent from my iPad

Sherie Goutier

From: Damon <captdamon@gmail.com>
Sent: Tuesday, January 14, 2020 12:03 PM
To: comments
Subject: Cod/Haddock limits for Dr. John Quinn

Hi John.

I am writing on behalf of the upcoming meeting on cod and haddock limits as they relate to rod and reel fishermen. I am a 25 year sportfishing charter captain based in Cape Cod. I am simply proposing that time be allotted in August as it is a much more popular month for charter fishing and the weather allows for more outings than in September.

Thank you for your time and consideration.

Captain Damon Sacco
Castafari INC

Sherie Goutier

From: Janice Williamson <jmw5659@comcast.net>
Sent: Monday, January 13, 2020 7:05 PM
To: comments
Subject: Attn: Dr Quinn and Mr. Nies (Ground Fishing)

Greetings Dr John and Mr. Tom,

Just a note in regards to a message I read about the upcoming ground fish regulation discussion.

I would like to offer some input:

I fish out of Scituate Ma on the F/V James Dobie.

I have always enjoyed Cod Fishing here. Regulation has changed the fishery.

Many of us have missed the opportunity to fish for Cod off our Massachusetts coast. I hope you can find a way to open or at least extend the season in the coming years.

I wont carry on.....but would be glad to discuss anything that may offer fishing information to you in relation to ground fishing or fishing in general around the Scituate area.

I suggest Cod fishing for rod and reel open May 15 - 31 and again August 15 - 31.

I will be glad to explain why. I believe the fish currently in the area will support this.

Sincerely,

774 571 1728

jmw5659@comcast.net

Chris Williamson

Sherie Goutier

From: Paul Diggins <paul@bostonfishing.com>
Sent: Monday, January 13, 2020 4:26 PM
To: comments
Subject: 2020 GOM Cod and Haddock Measures

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,
Paul Diggins
O/O Reel Pursuit Charters
28 Constitution Rd
Charlestown Ma 02129

Sent from [Mail](#) for Windows 10

Sherie Goutier

From: Bruce Sweet <bsweet60@comcast.net>
Sent: Sunday, January 12, 2020 10:55 AM
To: comments
Subject: GOM Recreational Cod comments

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in the second half of August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet as well it is likely there will be a commercial bluefin tuna closure by mid August (as has occurred the past 2 years) and having the cod opening during the tuna closure would benefit the for hire fleet during that period.

Sincerely,

Capt. Bruce Sweet
Sweet Dream Sport Fishing - Gloucester MA

jc 1/14/20

Sherie Goutier

From: TIM BRADY <tcbship874@comcast.net>
Sent: Tuesday, January 7, 2020 9:19 PM
To: comments
Cc: Michael Pierdinock; Dave Waldrip
Subject: Recreational For-Hire Cod



Dear Mr. Nies,

My name is Tim Brady and I own and operate Capt. Tim Brady and Sons Deep Sea Fishing taking groups of 7-25 pp fishing out of Plymouth MA. In addition I am a member of Plymouth Partyboat Association, Massachusetts Marine Fisheries Advisory Commission, and Stellwagen Bank National Marine Sanctuary Advisory Council.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

The imposition of Catch Shares continues to decimate not only commercial ground fishing but Recreational For-Hire fishing in the ports of Massachusetts. During the 2 week cod opening in 2019 I was only able to get off the dock 4 days (primarily due to weather) we were able to catch keeper cod easily within 3 miles of Plymouth in Cape COD Bay. I believe the recreational cod catch numbers are wildly inflated and to keep removing abundant desirable historic target species (we throw back cod, wolf fish and ocean pout regularly), will simply continue to drive for-hire boats in Massachusetts out of business.

Sincerely,

Capt. Tim Brady
Capt. Tim Brady and Sons Deep Sea Fishing
Plymouth, MA 02360
508-746-4809

JC 1/8/20

Sherie Goutier

From: Douglas Brander <douglaskbrander@gmail.com>
Sent: Monday, December 30, 2019 5:44 PM
To: comments
Subject: COD comments

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks (At least!) for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet. There are lots and lots of Cod available as we prove every time we drop a line for ground fish.

Sincerely,

Captain Doug Brander
ReelBusiness.NET
ReelBusiness,LLC
617-967-2223 cell
Hull, MA 02045

jc 1/2/20

Sherie Goutier

From: FMurray@murraystowing.com
Sent: Monday, December 30, 2019 4:13 PM
To: comments
Subject: ✱ Dear Mr. Nies, I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30t...

Fran Murray
Fish tales
Scituate ma

Sent from my iPhone

Je 11/20/20

Sherie Goutier

From: Brandon Montanez <bmont162@gmail.com>
Sent: Monday, December 30, 2019 4:26 PM
To: comments
Subject: Gulf of Maine Cod Fishing

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely, Brandon Montanez

Sent from my iPhone

JC 11/2/20

Sherie Goutier

From: Capt. Brad White <oceanburial@aol.com>
Sent: Monday, December 30, 2019 4:10 PM
To: comments
Subject: 2020 Gulf of Maine recreational cod season and possession limits.

Executive Director Tom Nies

Email comments@nefmc.org

12/30/2019

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two – three weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Please consider this request.

Thank you

Sincerely,

Capt Brad White
White Cap Charters
149 Old Main St

JC 1/2/20

Marshfield Hills, MA

02051

Tel: 781-834-0112

Captain Brad White

New England Burials At Sea

Coast to Coast

149 Old Main St, PO box 489, Marshfield Hills, MA 02051

Cell: (617) 966.1986, Office: 781.834.0112, Fax 781.834.0113

Email: OceanBurial@aol.com www.NewEnglandBurialsAtSea.com

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As seen in: "SHOWTIME, Boston Globe, WCVB TV Chronicle, Wall Street Journal, CNBC, MSNBC, Mother Jones, TIME online, American Funeral Director, Wired Magazine and many more.

Memberships: National, Northeast and Stellwagen Charterboat Captains and Operators associations, Gulf South Resources Crew Drug Free member, Chambers of Commerce, Sea Tow, Boat US

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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 01930-2276



Thomas A. Nies
 Executive Director
 New England Fishery Management Council
 50 Water Street Mill 2
 Newburyport, MA 01950

Dear Tom:

We recently completed the groundfish year-end accounting for the 2018 fishing year. We sent you a letter conveying the draft report on November 4, 2019, but it did not include the finalized catch accounting for Atlantic halibut. The final report is attached to this letter.

In fishing year 2018, the total annual catch limit (ACL) for Atlantic halibut was exceeded by 3.3 percent, or 3.3 mt. However, the overage was not greater than the management uncertainty buffer, and therefore the halibut accountability measure is not triggered. Table 1 summarizes the Atlantic halibut ACL overage.

Table 1. Fishing Year 2017 Atlantic Halibut ACL and Catch

Stock	U.S. ABC (mt)	Total ACL (mt)	Catch (mt and percent of ACL or sub-ACL)				
			Total	Groundfish Fishery	State Waters	Other sub-Component	
Atlantic halibut	104	100	103.3	103.3%	91.9%	147.4%	80.9%

If you have any questions on the report, please contact Peter Christopher, Groundfish Team Supervisor, at (978) 281-9288.

Sincerely,

Fe
 Michael Pentony
 Regional Administrator

cc: Dr. Jon Hare, Science and Research Director, Northeast Fisheries Science Center

Enclosure

jc 12/13/19



Northeast Multispecies Fishery

Final Year-End Results for Fishing Year 2018

- Tables 1 through 5: Total groundfish caught, landed, and discard estimates
- Table 6: Estimated state water catch
- Tables 7-9: Other sub-component catch detail
- Table 10: FY 2016 through FY 2018 GOM cod and haddock recreational catch evaluation
- Table 11: Sector carryover
- Tables 12 through 17: U.S./Canada stocks catch evaluation

In this report: a table cell value of "0" or "0.0" indicates a non-zero value in the cell. "-" is displayed for values exactly equal to zero. Blanks are shown when there are no values. "NA" is displayed when no value is applicable.

Table 1: FY 2018 Northeast Multispecies Percent of Annual Catch Limit Caught (%)

Stock	Components with ACLs and sub-ACLs: With Accountability Measures (AMs)								Sub-components: No AMs	
	Total	Groundfish Fishery	Sector	Common Pool	Recreational	Midwater Trawl Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
GB Cod	58.4	61.6	71.1	26.0					50.2	29.0
GOM Cod	75.7	75.7	86.7	48.8	66.8				80.7	51.8
GB Haddock	11.5	11.5	11.6	1.4		6.5			3.5	24.6
GOM Haddock	29.1	28.6	32.8	33.8	17.7	-			54.1	94.1
GB Yellowtail Flounder	19.7	14.7	14.9	-			87.5	2.5	NA	NA
SNE Yellowtail Flounder	22.3	19.6	19.9	18.1			79.7		9.8	20.5
CC/GOM Yellowtail Flounder	52.0	42.8	43.3	32.3					108.6	70.8
Plaice	69.6	68.3	68.6	49.1					66.9	131.7
Witch Flounder	95.6	95.6	97.9	96.7					66.6	112.7
GB Winter Flounder	59.1	57.5	57.9	-					NA	79.3
GOM Winter Flounder	54.6	25.7	26.7	6.4					200.9	189.4
SNE/MA Winter Flounder	56.9	48.4	50.1	35.6					21.8	120.5
Redfish	48.9	49.9	50.1	2.3					2.2	3.8
White Hake	75.6	76.7	77.2	8.1					1.3	54.1
Pollock	10.9	9.3	9.4	2.2					119.7	54.0
Northern Windowpane	65.9	52.8	NA	NA			123.7		20.3	22.9
Southern Windowpane	99.5	125.4	NA	NA			99.5		93.1	94.0
Ocean Pout	44.8	18.2	NA	NA					14.5	157.2
Halibut	103.3	91.9	NA	NA					147.4	80.9
Wolfish	1.9	1.8	NA	NA					3.9	5.5

Source: NMFS Greater Atlantic Regional Fisheries Office
November 22, 2019, run date of July 22, 2019

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting; (4) Observers and at-sea monitors via the Northeast Fisheries Observer Program. Differences with previous reports are due to corrections made to the database.

Table 2: FY 2018 Northeast Multispecies Annual Catch Limits (mt)

Stock	Components with ACLs and sub-ACLs: With Accountability Measures (AMs)								Sub-components: No AMs	
	Total ACL	Groundfish	Sector ¹	Common Pool ¹	Recreational	Midwater Trawl Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
GB Cod	1,519	1,360	1,170	24					16	143
GOM Cod	666	610	357	12	220				47	9
GB Haddock	46,312	44,659	44,340	319		680			487	487
GOM Haddock	12,409	12,096	8,641	98	3,358	122			95	95
GB Yellowtail Flounder	206	188	185	3			15	4	NA	0.0
SNE Yellowtail Flounder	66	43	35	8			3		2	17
CC/GOM Yellowtail Flounder	490	398	381	17					51	41
Plaice	1,649	1,580	1,552	28					35	35
Witch Flounder	948	849	811	18					40	60
GB Winter Flounder	787	731	725	6					NA	57
GOM Winter Flounder	428	357	339	18					67	4
SNE/MA Winter Flounder	700	518	456	62					73	109
Redfish	10,986	10,755	10,705	50					116	116
White Hake	2,794	2,735	2,715	21					29	29
Pollock	38,204	37,400	37,170	230					402	402
Northern Windowpane	86	63	NA	63			18		2	3
Southern Windowpane	457	53	NA	53			158		28	218
Ocean Pout	120	94	NA	94					3	23
Halibut	100	77	NA	77					21	2
Wolffish	84	82	NA	82					1	1

¹To account for overages of the 2016 ACLs for GB cod, GOM cod, and witch flounder, the following sub-ACLs were reduced midyear: GB cod (sector and common pool), GOM cod (sector only), and witch flounder (sector and common pool)

Values in metric tons of live weight

Source: NMFS Greater Atlantic Regional Fisheries Office
November 22, 2019

Table 3: FY 2018 Northeast Multispecies Total Catch (mt)

Stock	Total Catch	Groundfish Fishery	Sector	Common Pool	Recreational	Midwater Trawl Herring Fishery	Scallop Fishery ¹	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
GB Cod	887.3	837.9	831.6	6.3					8.0	41.5
GOM Cod	504.5	461.9	309.2	5.8	146.9				37.9	4.7
GB Haddock	5,324.3	5,143.7	5,139.2	4.4		43.9			17.1	119.7
GOM Haddock	3,605.9	3,465.1	2,837.1	33.0	595.0	-			51.4	89.4
GB Yellowtail Flounder	40.5	27.6	27.6	-			12.7	0.1	-	0.0
SNE/MA Yellowtail Flounder	14.7	8.5	7.0	1.5			2.6		0.2	3.5
CC/GOM Yellowtail Flounder	254.7	170.3	164.8	5.5					55.4	29.0
Plaice	1,147.9	1,078.4	1,064.7	13.7					23.4	46.1
Witch Flounder	906.1	811.8	794.1	17.7					26.6	67.6
GB Winter Flounder	465.1	419.9	419.9	-					-	45.2
GOM Winter Flounder	233.9	91.7	90.6	1.1					134.6	7.6
SNE/MA Winter Flounder	398.0	250.7	228.7	22.0					15.9	131.3
Redfish	5,369.1	5,362.1	5,360.9	1.2					2.6	4.4
White Hake	2,113.1	2,097.1	2,095.4	1.7					0.4	15.7
Pollock	4,179.1	3,480.8	3,475.8	5.0					481.1	217.3
Northern Windowpane	56.7	33.3	33.0	0.3			22.3		0.4	0.7
Southern Windowpane	454.7	66.5	49.7	16.8			157.1		26.1	205.0
Ocean Pout	53.7	17.1	17.0	0.1					0.4	36.2
Halibut	103.3	70.8	70.1	0.7					31.0	1.6
Wolffish	1.6	1.5	1.4	0.1					0.0	0.1

¹Based on scallop fishing year April 2018 through March 2019

Values in metric tons of live weight

Sector and common pool include estimate of missing dealer reports

Any value for a non-allocated species may include landings of that stock or misreporting of species and/or stock area. These are northern windowpane, southern windowpane, ocean pout, halibut, and wolffish.

Source: NMFS Greater Atlantic Regional Fisheries Office

November 22, 2019, run date of July 22, 2019

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting; (4) Observers and at-sea monitors via the Northeast Fisheries Observer Program. Differences with previous reports are due to corrections made to the database.

Table 4: FY 2018 Northeast Multispecies Landings (mt)

Stock	Total Landings	Groundfish Fishery	Sector	Common Pool	Recreational	Midwater Trawl Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
GB Cod	871.8	833.2	827.1	6.1					7.4	31.3
GOM Cod	352.1	310.8	302.8	3.6	4.3				37.7	3.7
GB Haddock	4,763.8	4,708.6	4,704.1	4.4		43.9			10.6	0.7
GOM Haddock	3,314.6	3,243.9	2,787.1	32.9	423.9	-			50.0	20.7
GB Yellowtail Flounder	27.4	27.4	27.4	-				-	-	-
SNE/MA Yellowtail Flounder	7.5	7.3	5.8	1.5				-	0.1	0.1
CC/GOM Yellowtail Flounder	205.2	149.0	144.1	4.9					55.0	1.3
Plaice	1,042.8	1,019.7	1,008.1	11.7					21.9	1.2
Witch Flounder	778.9	753.3	747.2	6.1					25.1	0.5
GB Winter Flounder	419.7	419.3	419.3	-					-	0.4
GOM Winter Flounder	225.5	89.3	88.2	1.1					133.6	2.6
SNE/MA Winter Flounder	269.7	247.7	226.5	21.2					14.7	7.3
Redfish	5,299.1	5,294.3	5,293.3	1.0					1.0	3.8
White Hake	2,088.5	2,086.1	2,084.6	1.6					0.1	2.2
Pollock	3,633.7	3,374.0	3,369.2	4.8					187.2	72.5
Northern Windowpane	0.0	0.0	0.0	-					-	-
Southern Windowpane	18.8	0.0	-	0.0					18.8	0.0
Ocean Pout	-	-	-	-					-	-
Halibut	58.2	27.1	26.4	0.7					30.1	1.1
Wolffish	-	-	-	-					-	-

Values in metric tons of live weight

Sector and common pool include estimate of missing dealer reports

Any value for a non-allocated species may include landings of that stock or misreporting of species and/or stock area. These are northern windowpane, southern windowpane, ocean pout, halibut, and wolffish.

Source: NMFS Greater Atlantic Regional Fisheries Office

November 22, 2019, run date of July 22, 2019

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting; (4) Observers and at-sea monitors via the Northeast Fisheries Observer Program. Differences with previous reports are due to corrections made to the database.

Table 5: FY 2018 Northeast Multispecies Estimated Discards (mt)

Stock	Total Discards	Groundfish Fishery	Sector	Common Pool	Recreational	Midwater Trawl Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
GB Cod	15.5	4.7	4.4	0.2					0.7	10.2
GOM Cod	152.4	151.1	6.4	2.2	142.6				0.2	1.0
GB Haddock	560.6	435.1	435.1	0.0		-			6.5	119.0
GOM Haddock	291.3	221.2	50.0	0.1	171.1	-			1.4	68.7
GB Yellowtail Flounder	13.1	0.2	0.2	-			12.7	0.1	-	0.0
SNE/MA Yellowtail Flounder	7.3	1.1	1.1	0.0			2.6		0.1	3.4
CC/GOM Yellowtail Flounder	49.5	21.4	20.8	0.6					0.4	27.7
Plaice	105.1	58.7	56.7	2.0					1.5	44.9
Witch Flounder	127.2	58.5	46.9	11.6					1.5	67.1
GB Winter Flounder	45.3	0.6	0.6	-					-	44.8
GOM Winter Flounder	8.4	2.4	2.4	0.0					1.0	5.0
SNE/MA Winter Flounder	128.3	3.0	2.3	0.8					1.2	124.0
Redfish	70.0	67.8	67.7	0.2					1.6	0.6
White Hake	24.7	11.0	10.9	0.1					0.3	13.4
Pollock	545.5	106.8	106.6	0.2					293.9	144.8
Northern Windowpane	56.6	33.3	33.0	0.3			22.3		0.4	0.7
Southern Windowpane	435.9	66.5	49.7	16.8			157.1		7.3	205.0
Ocean Pout	53.7	17.1	17.0	0.1					0.4	36.2
Halibut	45.1	43.7	43.7	0.0					0.9	0.5
Wolffish	1.6	1.5	1.4	0.1					0.0	0.1

Values in metric tons of live weight

Sector and common pool include estimate of missing dealer reports

Source: NMFS Greater Atlantic Regional Fisheries Office

November 22, 2019, run date of July 22, 2019

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting; (4) Observers and at-sea monitors via the Northeast Fisheries Observer Program. Differences with previous reports are due to corrections made to the database.

Table 6: FY 2018 Northeast Multispecies Estimated State Water Sub-Component Catch Detail (mt)

Stock	Total			Commercial			Recreational		
	Catch	Landings	Discard	Total Catch	Landings ¹	Discard ¹	Total Catch	Landings	Discard
	A+B+C+D	A+C	B+D	A+B	A	B	C+D	C	D
GB Cod	8.0	7.4	0.7	2.5	2.4	0.1	5.5	4.9	0.6
GOM Cod	37.9	37.7	0.2	37.9	37.7	0.2	-*	-*	-*
GB Haddock	17.1	10.6	6.5	17.1	10.6	6.5			
GOM Haddock	51.4	50.0	1.4	51.4	50.0	1.4	-*	-*	-*
GB Yellowtail Flounder	-	-	-	-	-	-			
SNE/MA Yellowtail Flounder	0.2	0.1	0.1	0.2	0.1	0.1			
CC/GOM Yellowtail Flounder	55.4	55.0	0.4	55.4	55.0	0.4			
Plaice	23.4	21.9	1.5	23.4	21.9	1.5			
Witch Flounder	26.6	25.1	1.5	26.6	25.1	1.5			
GB Winter Flounder	-	-	-	-	-	-			
GOM Winter Flounder	134.6	133.6	1.0	106.5	106.4	0.1	28.1	27.2	1.0
SNE/MA Winter Flounder	15.9	14.7	1.2	14.6	14.5	0.1	1.3	0.2	1.1
Redfish	2.6	1.0	1.6	2.6	1.0	1.6			
White Hake	0.4	0.1	0.3	0.4	0.1	0.3			
Pollock	481.1	187.2	293.9	6.6	3.5	3.1	474.5	183.7	290.8
Northern Windowpane	0.4	-	0.4	0.4	-	0.4			
Southern Windowpane	26.1	18.8	7.3	26.1	18.8	7.3			
Ocean Pout	0.4	-	0.4	0.4	-	0.4			
Halibut	31.0	30.1	0.9	31.0	30.1	0.9			
Wolfish	0.0	-	0.0	0.0	-	0.0			

*Recreational catch of GOM cod and haddock in state waters is attributed to the recreational sub-ACL (see Tables 1 - 5), and so is not included above.

¹January through April 2019 commercial catches are estimated.

State discard rate estimates based on discard rates on federal trips

Values in metric tons of live weight

Source: NMFS Greater Atlantic Regional Fisheries Office

November 22, 2019, run date of September 27, 2019

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting; (4) Observers and at-sea monitors via the Northeast Fisheries Observer Program. Differences with previous reports are due to corrections made to the database.

Table 7: FY 2018 Northeast Multispecies Other Sub-Component Catch Detail (mt)

Stock	Total	SCALLOP ¹	FLUKE	HAGFISH	HERRING	LOBSTER/ CRAB ²	MACKEREL	MENHADEN	MONKFISH	REDCRAB	RESEARCH
GB Cod	41.5	7.6	0.1	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0
GOM Cod	4.7	0.3	0.0	0.0	0.3	0.0	-	-	0.1	-	3.5
GB Haddock	119.7	13.4	2.8	-	0.5*	-	0.9	0.0	0.3	-	0.5
GOM Haddock	89.4	0.0	0.0	0.7	2.8*	-	0.2	-	0.0	-	20.7
GB Yellowtail Flounder	0.0	-*	0.0	0.0	0.0*	-	-	-	-	0.0	-
SNE Yellowtail Flounder	3.5	-*	0.4	-	0.0	-	0.0	0.0	0.3	-	0.0
CC/GOM Yellowtail Flounder	29.0	11.8	0.0	0.2	1.0	-	-	-	0.0	-	1.3
American Plaice	46.1	25.7	0.0	-	0.1	-	0.2	0.0	0.0	-	1.2
Witch Flounder	67.6	31.7	1.0	0.0	0.2	-	0.3	0.0	0.1	0.0	0.5
GB Winter Flounder	45.2	34.8	0.0	0.0	0.9	-	-	-	-	0.0	-
GOM Winter Flounder	7.6	2.7	0.0	0.0	0.9	0.0	-	-	0.0	-	0.9
SNE Winter Flounder	131.3	52.5	3.8	0.0	0.3	0.0	0.6	0.0	0.5	0.0	0.0
Redfish	4.4	0.0	0.0	-	0.0	-	0.0	0.0	0.0	-	3.5
White Hake	15.7	1.9	0.6	0.0	0.1	0.0	0.1	0.0	0.1	0.0	2.0
Pollock	217.3	0.4	-	-	0.0	-	0.0	0.0	0.3	-	0.9
Northern Windowpane	0.7	-*	0.0	0.0	0.0	-	-	-	0.0	0.0	0.0
Southern Windowpane	205.0	-*	23.6	-	0.5	-	0.9	0.0	1.1	-	0.0
Ocean Pout	36.2	4.8	0.7	0.0	0.2	-	0.2	0.0	0.0	0.1	0.0
Halibut	1.6	-	-	-	0.0	0.8	0.0	0.0	0.2	-	0.1
Wolffish	0.1	0.0	0.0	-	0.0	-	0.0	0.0	0.0	-	0.0

Values in metric tons of live weight

¹Based on scallop fishing year April 2018 through March 2019

²Landings only. Discard estimates not applicable. Lobster/crab discards were not attributed to the ACL, consistent with the most recent assessments for these stocks used to set the respective quotas.

*Some or all catch attributed to separate sub-ACL as shown in Tables 1 through 5, and so is not included above.

Source: NMFS Greater Atlantic Regional Fisheries Office
Nov. 22, 2019, run date of Sept. 17, 2019

These criteria are used by the Greater Atlantic Regional Fisheries Office (GARFO) to categorize trips to attribute groundfish catch for groundfish ACL accounting. By necessity these rules cannot capture the full complexity of categorizing every trip taken by vessels fishing in the Northeast. Further analysis should be completed to definitively attribute groundfish catch to an FMP for management purposes.

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting. Differences with previous reports are due to corrections made to the database.

Table 7: FY 2018 Northeast Multispecies Other Sub-Component Catch Detail (mt)

Stock	Total	SCUP	SHRIMP	SQUID	SQUID/ WHITING	SURFLAM	WHELK/ CONCH	WHITING	UNCATEGORIZED	RECREATIONAL
GB Cod	41.5	0.1	0.0	0.8	0.1	0.0	0.0	0.0	0.7	31.6
GOM Cod	4.7	-	-	0.0	0.0	0.0	0.0	0.0	0.3	-*
GB Haddock	119.7	2.9	0.1	73.3	7.2	1.0	-	0.2	16.8	
GOM Haddock	89.4	-	-	0.0	4.2	0.2	0.1	5.5	55.0	-*
GB Yellowtail Flounder	0.0	0.0	-*	0.0*	0.0	-	-	-	0.0*	
SNE Yellowtail Flounder	3.5	0.4	0.0	1.3	0.1	0.0	-	0.0	0.9	
CC/GOM Yellowtail Flounder	29.0	-	-	0.9	7.5	0.1	0.0	2.5	3.6	
American Plaice	46.1	0.0	0.0	14.0	1.4	0.2	-	0.1	3.0	
Witch Flounder	67.6	1.0	0.0	23.9	2.4	0.3	0.0	0.2	6.1	
GB Winter Flounder	45.2	0.0	-	4.1	5.3	-	-	-	0.0	
GOM Winter Flounder	7.6	-	-	0.0	0.2	0.0	0.0	0.3	0.8	1.8
SNE Winter Flounder	131.3	3.5	0.1	47.9	3.2	0.8	0.0	0.1	14.1	4.1
Redfish	4.4	0.0	0.0	0.6	0.1	0.0	-	0.0	0.2	
White Hake	15.7	0.6	0.0	6.2	0.7	0.1	0.0	0.0	3.3	
Pollock	217.3	-	0.0	0.6	0.1	0.0	-	0.0	0.4	214.7
Northern Windowpane	0.7	0.0	-	0.1	0.2	0.0	0.0	0.0	0.3	
Southern Windowpane	205.0	24.8	0.1	98.7	7.2	2.5	-	0.2	45.2	
Ocean Pout	36.2	0.8	0.0	21.2	2.2	0.3	0.1	0.2	5.3	
Halibut	1.6	-	0.0	0.3	0.1	0.0	-	0.0	0.2	
Wolffish	0.1	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0	

Values in metric tons of live weight

*Some or all catch attributed to separate sub-ACL as shown in Tables 1 through 5, and so is not included above.

Source: NMFS Greater Atlantic Regional Fisheries Office
Nov. 22, 2019, run date of Sept. 17, 2019

These criteria are used by the Greater Atlantic Regional Fisheries Office (GARFO) to categorize trips to attribute groundfish catch for groundfish ACL accounting. By necessity these rules cannot capture the full complexity of categorizing every trip taken by vessels fishing in the Northeast. Further analysis should be completed to definitively attribute groundfish catch to an FMP for management purposes.

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Table 8: FY 2018 Northeast Multispecies Other Sub-Component Landings Detail (mt)

Stock	Total	SCALLOP ¹	FLUKE	HAGFISH	HERRING	LOBSTER/ CRAB	MACKEREL	MENHADEN	MONKFISH	REDCRAB	RESEARCH
GB Cod	31.3	0.6	0.0	-	-	0.0	-	-	0.2	-	0.0
GOM Cod	3.7	-	-	-	-	0.0	-	-	0.1	-	3.5
GB Haddock	0.7	0.0	0.1	-	-*	-	-	-	0.0	-	0.5
GOM Haddock	20.7	-	-	-	-*	-	-	-	-	-	20.5
GB Yellowtail Flounder	-	-*	-	-	-	-	-	-	-	-	-
SNE Yellowtail Flounder	0.1	-*	0.0	-	-	-	-	-	-	-	-
CC/GOM Yellowtail Flounder	1.3	-	-	-	-	-	-	-	-	-	1.3
American Plaice	1.2	-	-	-	-	-	-	-	-	-	1.2
Witch Flounder	0.5	0.0	0.0	-	-	-	-	-	-	-	0.5
GB Winter Flounder	0.4	0.4	-	-	-	-	-	-	-	-	-
GOM Winter Flounder	2.6	-	0.0	-	-	0.0	-	-	-	-	0.9
SNE Winter Flounder	7.3	1.2	0.6	-	-	0.0	-	-	0.0	-	-
Redfish	3.8	-	0.0	-	-	-	-	-	-	-	3.5
White Hake	2.2	-	0.0	-	-	0.0	-	-	0.0	-	2.0
Pollock	72.5	-	-	-	-	-	-	-	0.1	-	0.9
Northern Windowpane	-	-*	-	-	-	-	-	-	-	-	-
Southern Windowpane	0.0	-*	-	-	-	-	-	-	-	-	-
Ocean Pout	-	-	-	-	-	-	-	-	-	-	-
Halibut	1.1	-	-	-	-	0.8	-	-	0.1	-	0.1
Wolffish	-	-	-	-	-	-	-	-	-	-	-

Values in metric tons of live weight

¹Based on scallop fishing year April 2018 through March 2019

*Some or all catch attributed to separate sub-ACL as shown in Tables 1 through 5, and so is not included above.

Source: NMFS Greater Atlantic Regional Fisheries Office

Nov. 22, 2019, run date of Sept. 17, 2019

These criteria are used by the Greater Atlantic Regional Fisheries Office (GARFO) to categorize trips to attribute groundfish catch for groundfish ACL accounting. By necessity these rules cannot capture the full complexity of categorizing every trip taken by vessels fishing in the Northeast. Further analysis should be completed to definitively attribute groundfish catch to an FMP for management purposes.

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting. Differences with previous reports are due to corrections made to the database.

Table 8: FY 2018 Northeast Multispecies Other Sub-Component Landings Detail (mt)

Stock	Total	SCUP	SHRIMP	SQUID	SQUID/ WHITING	SURFLAM	WHELK/ CONCH	WHITING	UNCATEGORIZED	RECREATIONAL
GB Cod	31.3	0.0	-	0.0	0.0	-	-	-	0.2	30.3
GOM Cod	3.7	-	-	-	-	-	-	-	0.0	.*
GB Haddock	0.7	0.0	-	0.0	0.0	-	-	-	0.1	
GOM Haddock	20.7	-	-	-	-	-	-	-	0.2	.*
GB Yellowtail Flounder	-	-	-	-	-	-	-	-	-	
SNE Yellowtail Flounder	0.1	-	-	0.0	0.0	-	-	-	0.0	
CC/GOM Yellowtail Flounder	1.3	-	-	-	-	-	-	-	-	
American Plaice	1.2	-	-	-	0.0	-	-	-	-	
Witch Flounder	0.5	-	-	0.0	-	-	-	-	-	
GB Winter Flounder	0.4	-	-	-	-	-	-	-	-	
GOM Winter Flounder	2.6	-	-	-	-	-	-	-	-	1.7
SNE Winter Flounder	7.3	0.2	-	0.2	0.0	-	-	-	1.0	4.1
Redfish	3.8	-	-	0.3	0.0	-	-	-	0.0	
White Hake	2.2	-	-	0.0	0.0	-	-	-	0.1	
Pollock	72.5	-	-	-	-	-	-	-	0.1	71.5
Northern Windowpane	-	-	-	-	-	-	-	-	-	
Southern Windowpane	0.0	-	-	-	-	-	-	-	0.0	
Ocean Pout	-	-	-	-	-	-	-	-	-	
Halibut	1.1	-	-	-	0.1	-	-	-	0.1	
Wolffish	-	-	-	-	-	-	-	-	-	

Values in metric tons of live weight

*Some or all catch attributed to separate sub-ACL as shown in Tables 1 through 5, and so is not included above.

Source: NMFS Greater Atlantic Regional Fisheries Office

Nov. 22, 2019, run date of Sept. 17, 2019

These criteria are used by the Greater Atlantic Regional Fisheries Office (GARFO) to categorize trips to attribute groundfish catch for groundfish ACL accounting. By necessity these rules cannot capture the full complexity of categorizing every trip taken by vessels fishing in the Northeast. Further analysis should be completed to definitively attribute groundfish catch to an FMP for management purposes.

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Table 9: FY 2018 Northeast Multispecies Other Sub-Component Estimated Discards Detail (mt)

Stock	Total	SCALLOP ¹	FLUKE	HAGFISH	HERRING	LOBSTER/ CRAB ²	MACKEREL	MENHADEN	MONKFISH	REDCRAB	RESEARCH
GB Cod	10.2	7.0	0.1	0.0	0.0	NA	0.0	0.0	0.3	0.0	0.0
GOM Cod	1.0	0.3	0.0	0.0	0.3	NA	-	-	0.0	-	0.0
GB Haddock	119.0	13.3	2.7	-	.5*	NA	0.9	0.0	0.3	-	0.0
GOM Haddock	68.7	0.0	0.0	0.7	2.8*	NA	0.2	-	0.0	-	0.2
GB Yellowtail Flounder	0.0	-*	0.0	0.0	0.0*	NA	-	-	-	0.0	-
SNE Yellowtail Flounder	3.4	-*	0.4	-	0.0	NA	0.0	0.0	0.3	-	0.0
CC/GOM Yellowtail Flounder	27.7	11.8	0.0	0.2	1.0	NA	-	-	0.0	-	0.0
American Plaice	44.9	25.7	0.0	-	0.1	NA	0.2	0.0	0.0	-	0.0
Witch Flounder	67.1	31.7	1.0	0.0	0.2	NA	0.3	0.0	0.1	0.0	0.0
GB Winter Flounder	44.8	34.4	0.0	0.0	0.9	NA	-	-	-	0.0	-
GOM Winter Flounder	5.0	2.7	0.0	0.0	0.9	NA	-	-	0.0	-	0.0
SNE Winter Flounder	124.0	51.3	3.1	0.0	0.3	NA	0.6	0.0	0.4	0.0	0.0
Redfish	0.6	0.0	0.0	-	0.0	NA	0.0	0.0	0.0	-	0.0
White Hake	13.4	1.9	0.6	0.0	0.1	NA	0.1	0.0	0.1	0.0	0.0
Pollock	144.8	0.4	-	-	0.0	NA	0.0	0.0	0.2	-	0.0
Northern Windowpane	0.7	-*	0.0	0.0	0.0	NA	-	-	0.0	0.0	0.0
Southern Windowpane	205.0	-*	23.6	-	0.5	NA	0.9	0.0	1.1	-	0.0
Ocean Pout	36.2	4.8	0.7	0.0	0.2	NA	0.2	0.0	0.0	0.1	0.0
Halibut	0.5	-	-	-	0.0	NA	0.0	0.0	0.1	-	0.0
Wolffish	0.1	0.0	0.0	-	0.0	NA	0.0	0.0	0.0	-	0.0

Values in metric tons of live weight

¹Based on scallop fishing year April 2018 through March 2019

²Discard estimates not applicable. Lobster/crab discards were not attributed to the ACL, consistent with the most recent assessments for these stocks used to set the respective quotas.

*Some or all catch attributed to separate sub-ACL as shown in Tables 1 through 5, and so is not included above.

Source: NMFS Greater Atlantic Regional Fisheries Office

Nov. 22, 2019, run date of Sept. 17, 2019

These criteria are used by the Greater Atlantic Regional Fisheries Office to categorize trips to attribute groundfish catch for groundfish ACL accounting. By necessity these rules cannot capture the full complexity of categorizing every trip taken by vessels fishing in the Northeast. Further analysis should be completed to definitively attribute groundfish catch to an FMP for management purposes.

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Stock	Total	SCUP	SHRIMP	SQUID	SQUID/ WHITING	SURFCLAM	WHELK/ CONCH	WHITING	UNCATEGORIZED	RECREATIONAL
GB Cod	10.2	0.1	0.0	0.8	0.1	0.0	0.0	0.0	0.5	1.3
GOM Cod	1.0	-	-	0.0	0.0	0.0	0.0	0.0	0.3	-*
GB Haddock	119.0	2.8	0.1	73.3	7.1	1.0	-	0.2	16.7	
GOM Haddock	68.7	-	-	0.0	4.2	0.2	0.1	5.5	54.8	-*
GB Yellowtail Flounder	0.0	0.0	-	0.0*	0.0*	-	-	-	0.0*	
SNE Yellowtail Flounder	3.4	0.4	0.0	1.2	0.1	0.0	-	0.0	0.9	
CC/GOM Yellowtail Flounder	27.7	-	-	0.9	7.5	0.1	0.0	2.5	3.6	
American Plaice	44.9	0.0	0.0	14.0	1.4	0.2	-	0.1	3.0	
Witch Flounder	67.1	1.0	0.0	23.9	2.4	0.3	0.0	0.2	6.1	
GB Winter Flounder	44.8	0.0	-	4.1	5.3	-	-	-	0.0	
GOM Winter Flounder	5.0	-	-	0.0	0.2	0.0	0.0	0.3	0.8	0.1
SNE Winter Flounder	124.0	3.3	0.1	47.7	3.2	0.8	0.0	0.1	13.0	0.0
Redfish	0.6	0.0	0.0	0.3	0.0	0.0	-	0.0	0.2	
White Hake	13.4	0.6	0.0	6.2	0.6	0.1	0.0	0.0	3.2	
Pollock	144.8	-	0.0	0.6	0.1	0.0	-	0.0	0.3	143.2
Northern Windowpane	0.7	0.0	-	0.1	0.2	0.0	0.0	0.0	0.3	
Southern Windowpane	205.0	24.8	0.1	98.7	7.2	2.5	-	0.2	45.2	
Ocean Pout	36.2	0.8	0.0	21.2	2.2	0.3	0.1	0.2	5.3	
Halibut	0.5	-	0.0	0.3	0.0	0.0	-	0.0	0.1	
Wolffish	0.1	0.0	0.0	0.0	0.0	0.0	-	0.0	0.0	

Values in metric tons of live weight

*Some or all catch attributed to separate sub-ACL as shown in Tables 1 through 5, and so is not included above.

Source: NMFS Greater Atlantic Regional Fisheries Office

Nov. 22, 2019, run date of Sept. 17, 2019

These criteria are used by the Greater Atlantic Regional Fisheries Office to categorize trips to attribute groundfish catch for groundfish ACL accounting. By necessity these rules cannot capture the full complexity of categorizing every trip taken by vessels fishing in the Northeast. Further analysis should be completed to definitively attribute groundfish catch to an FMP for management purposes.

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**Table 10: FY 2016 - 2018 GOM Cod and Haddock Recreational Catch Evaluation
(mt)**

Stock	Fishing Year	Recreational Catch				
		Catch	Landings	Discard	Recreational sub-ACL	Percent of Catch Limit Taken
		A + B	A	B		
GOM Cod	2016	280.9	94.5	186.4	157	178.9
	2017	245.4	26.6	218.8	157	156.3
	2018	146.9	4.3	142.6	220	66.8
	Average	224.4	41.8	182.6	178	126.1
GOM Haddock	2016	887.0	560.2	326.8	928	95.6
	2017	795.0	533.7	261.3	1,160	68.5
	2018	595.0	423.9	171.1	3,358	17.7
	Average	759.0	505.9	253.1	1,815	41.8

Recreational estimates based on Marine Recreational Information Program (MRIP) data.
Values in metric tons of live weight

Source: NMFS Greater Atlantic Regional Fisheries Office
November 22, 2019

These data are the best available to NOAA's National Marine Fisheries Service (NMFS).

Table 11: FY 2018 Northeast Multispecies Sector Carryover (mt)

Stock**	FY 2018 Available Annual Catch Entitlement (ACE)				Available Carryover from FY 2018 to FY 2019	
	FY 2018 Initial ACE	FY 2017 Carryover	FY 2018 Total ACE	Total ACE as a Percent of Initial ACE	<i>de minimis</i>	Maximum
	A	B	C = A + B	C / A	D	E
GB Cod	1,170	38	1,208	103.3	13	83
GOM Cod	351	22	373	106.3	3	28
GB Haddock	44,338	3,840	48,178	108.7	502	2,865
GOM Haddock	8,558	265	8,823	103.1	79	687
GB Yellowtail Flounder	185.1	NA*	185.1	100.0	NA*	NA*
SNE/MA Yellowtail Flounder	35	11	46	131.5	0	2
CC/GOM Yellowtail Flounder	373	18	391	104.8	4	21
Plaice	1,531	67	1,598	104.4	14	77
Witch Flounder	794	39	833	104.9	7	35
GB Winter Flounder	725	19	744	102.6	7	24
GOM Winter Flounder	332	34	366	110.2	3	19
SNE Winter Flounder	456	31	487	106.8	4	27
Redfish	10,650	558	11,208	105.2	98	577
White Hake	2,703	154	2,857	105.7	23	144
Pollock	37,081	938	38,019	102.5	344	1,968

*Carryover of GB yellowtail flounder is not allowed because this stock is jointly managed with Canada.

**There is no carryover for non-allocated stocks: Northern windowpane flounder, southern windowpane flounder, ocean pout, halibut, and wolffish.

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting; (4) Observers and at-sea monitors via the Northeast Fisheries Observer Program. Differences with previous reports are due to corrections made to the database.

Source: NMFS Greater Atlantic Regional Fisheries Office

Run Date: October 18, 2019

**Table 12: FY 2018 End of Year Accounting of Transboundary U.S./Canada Stocks -
Percentage of U.S. TACs Caught (%)**

Stock	% of U.S. TAC	Percent of Each Fishery Component U.S. TAC Caught								
		Groundfish	Sector	Common Pool	Recreational	Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
Eastern GB Cod	41.4	41.4	42.3	0.0					NA	NA
Eastern GB Haddock	4.0	4.0	4.0	0.0		NA			NA	NA
GB Yellowtail Flounder	19.0	14.7	14.9	0.0			87.5	2.5	NA	NA

Values in percent live weight (%)

Includes estimate of missing dealer reports

Source: NMFS Greater Atlantic Regional Fisheries Office

August 27, 2019

Any value for a non-allocated species may be due to landings of that stock; misreporting of species and/or stock area; and/or estimated landings (in lieu of missing reports) based on vessel histories.

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Table 13: FY 2018 End of Year Accounting of Transboundary U.S./Canada Stocks - U.S. TACs (mt)

Stock	U.S. TAC	Fishery Component TAC								
		Groundfish	Sector	Common Pool	Recreational	Herring Fishery	Scallop Fishery	Small-Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
Eastern GB Cod	257	257	252	5						
Eastern GB Haddock	15,600	15,600	15,489	111						
GB Yellowtail Flounder	213.0	187.9	185.1	2.9			14.6	4.0		0.0

Values in live weight

Source: NMFS Greater Atlantic Regional Fisheries Office
August 27, 2019

Any value for a non-allocated species may be due to landings of that stock; misreporting of species and/or stock area; and/or estimated landings (in lieu of missing reports) based on vessel histories.

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting. Differences with previous reports are due to corrections made to the database.

Table 14: FY 2018 End of Year Accounting of Transboundary U.S./Canada Stocks - U.S. Catch (mt)

Stock	U.S. Catch by Fishery Component									
	U.S. Catch	Groundfish	Sector	Common Pool	Recreational	Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
Eastern GB Cod	106.4	106.4	106.4	-					-	0.0
Eastern GB Haddock	631.4	623.1	623.1	-		6.7			-	1.5
GB Yellowtail Flounder	40.5	27.6	27.6	-			12.7	0.1	-	0.0

Values in live weight
Includes estimate of missing dealer reports
August 27, 2019

Table 15: FY 2018 End of Year Transboundary U.S./Canada Vessels, Trips, DAS Used, and Observers

Area ¹	Number of Vessels		Number of Trips		DAS Used		Number of Observed Trips	
	Sector	Common Pool	Sector	Common Pool	Sector	Common Pool	Sector	Common Pool
Eastern U.S./Canada Area	25	0	145	0	921	0	28	0
Western U.S./Canada Area	39	0	407	0	2,357	0	75	0
Total	40	0	440	0	2,499	0	80	0

¹Area based on area fished. Totals don't sum due to multi-area trips
Data display "NA" due to data confidentiality.

Source: NMFS Greater Atlantic Regional Fisheries Office
August 27, 2019

Any value for a non-allocated species may be due to landings of that stock; misreporting of species and/or stock area; and/or estimated landings (in lieu of missing reports) based on vessel histories.

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting. Differences with previous reports are due to corrections made to the database.

Table 16: FY 2018 End of Year Accounting of Transboundary U.S./Canada Stocks - U.S. Landings (mt)

Stock	U.S. Landings	U.S. Catch by Fishery Component								
		Groundfish	Sector	Common Pool	Recreational	Herring Fishery*	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
Eastern GB Cod	105.0	105.0	105.0	-					-	-
Eastern GB Haddock	567.9	561.2	561.2	-		6.7			-	-
GB Yellowtail Flounder	27.4	27.4	27.4	-			-	-	-	-

Values in live weight

Includes estimate of missing dealer reports

Source: NMFS Greater Atlantic Regional Fisheries Office
August 27, 2019

Any value for a non-allocated species may be due to landings of that stock; misreporting of species and/or stock area; and/or estimated landings (in lieu of missing reports) based on vessel histories.

These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting. Differences with previous reports are due to corrections made to the database.

Table 17: FY 2018 End of Year Accounting of Transboundary U.S./Canada Stocks - U.S. Discards (mt)

Stock	U.S. Catch by Fishery Component									
	U.S. Discards	Groundfish	Sector	Common Pool	Recreational	Herring Fishery	Scallop Fishery	Small Mesh Fisheries	State Water	Other
	A to H	A+B+C	A	B	C	D	E	F	G	H
Eastern GB Cod	1.4	1.4	1.4	-					-	0.0
Eastern GB Haddock	63.5	61.9	61.9	-		-			-	1.5
GB Yellowtail Flounder	13.0	0.2	0.2	-			12.7	0.1	-	0.0

Values in live weight

Includes estimate of missing dealer reports

Source: NMFS Greater Atlantic Regional Fisheries Office
August 27, 2019

Any value for a non-allocated species may be due to landings of that stock; misreporting of species and/or stock area; and/or estimated landings (in lieu of missing reports) based on vessel histories.
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These data are the best available to NOAA's National Marine Fisheries Service (NMFS). Data sources for this report include: (1) Vessels via VMS; (2) Vessels via vessel logbook reports; (3) Dealers via Dealer Electronic reporting. Differences with previous reports are due to corrections made to the database.



New England Fishery Management Council

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John F. Quinn, J.D., Ph.D., *Chairman* | Thomas A. Nies, *Executive Director*

December 11, 2019

Mr. Alan Risenhoover
Director, Office of Sustainable Fisheries
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
1315 East-West Highway, Room 14743
Silver Spring, MD 20910

Dear Alan:

Thank you for providing the New England Fishery Management Council the opportunity to comment on the DRAFT tech memo titled "National Standard 1 Technical Guidance for Designing, Evaluating, and Implementing Carry-over and Phase-in Provisions within ABC Control Rules". As requested, the Council developed its comments in consultation with its Scientific and Statistical Committee (SSC).

Our Council believes that allowing ACL and ABC carryovers can be very beneficial, as long as the carryovers do not cause overfishing in the subsequent year. It believes that carryover provisions like those implemented under the Atlantic Scallop and Northeast Multispecies provide adequate safeguards to avoid overfishing and provide important safety and flexibility benefits for these fisheries.

Allowing a phase-in policy of fishing reductions needed to end overfishing also could be beneficial in terms of reducing economic and social impacts on the fishery under some circumstances, and our Council believes that the policy guidance provides a useful framework for evaluating whether a phase-in is appropriate.

One issue that should be considered in the development of National Standard 1 guidance is how councils should develop ABCs and ACLs for stocks that no longer have an accepted assessment and for which the OFL cannot be determined. I mention that in these comments because the lack of an agreed upon OFL also could affect carryovers and phase-ins.

Additionally, there is an error in the example that is provided for how carryover provisions might apply in the Atlantic Scallop FMP. The scallop ACLs that are proposed in each framework adjustment for updating scallop specifications and the final rule published by NMFS do not include carryover values because they are not known at that time.

Thank you for considering our Council's comments and if you have any questions, please contact me.

Sincerely,

Thomas A. Nies
Executive Director



conservation law foundation

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November 26, 2019

Dr. John Quinn, Council Chairman
Mr. Tom Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950



Submitted via comments@nefmc.org

RE: Framework Adjustment 59 to the Northeast Multispecies FMP

Dear Dr. Quinn and Mr. Nies:

Conservation Law Foundation (CLF) submits this letter to the New England Fishery Management Council (Council) regarding Framework Adjustment 59 to the Northeast Multispecies Fishery Management Plan (Framework 59), specifically the specifications for Gulf of Maine cod (GOM cod) and Georges Bank cod (GB cod) in fishing years (FY) 2020-2022. CLF has a long history of advocating for sustainable fisheries in New England, and we are increasingly concerned about the failure to end overfishing immediately and rebuild these stocks as quickly as possible consistent with legal requirements of the Magnuson-Stevens Act (MSA). We urge the Council to propose specifications for GOM cod and GB cod that end overfishing and place these stocks on appropriate rebuilding trajectories.

Legal Mandate

As set forth in National Standard 1, the primary mandate of the MSA is to prevent overfishing: “Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.”¹ To do so, the MSA requires annual catch limits and accountability measures that end overfishing “based upon the best scientific information available.”² Further, for overfished stocks such as GOM cod and GB cod, conservation and management measures must be implemented “to end overfishing *immediately* in the fishery and to rebuild affected stocks of fish.”³ To date, the Council has repeatedly proposed specifications for Atlantic cod stocks that do not achieve these legal mandates.

¹ 16 U.S.C. § 1851(a)(1).
² *Id.* §§ 1851(a)(2), 1853(a)(15).
³ *Id.* § 1854(e)(3)(A) (emphasis added).

Best Scientific Information Available

Both GOM and GB cod stocks are overfished with overfishing occurring,⁴ despite being in rebuilding plans (two for GOM cod) since 2004. The best scientific information available, including the 2019 operational assessments, demonstrate that they **have been subject to overfishing for 100 percent of the time periods covered by the assessments (GOM cod: 1982-2018, GB cod: 1978-2011) and have been overfished for all but two years.**

GOM cod lingers at historic low population levels that are only 6 to 9 percent of its spawning stock biomass target.⁵ In addition to a decline in stock size⁶ and geographic range,⁷ GOM cod also exhibits a severely truncated age structure,⁸ which is indicative of a population experiencing high fishing pressure and lack of recruitment. Recruitment remains near record low, with little positive signs of incoming recruitment,⁹ guaranteeing that the stock will not meet its 2024 rebuilding date. In fact, five years into the ten-year rebuilding plan, there is only a **0 to 1 percent chance that GOM cod will rebuild on schedule** even under a no-fishing scenario;¹⁰ that is a 26-fold decrease in probability of rebuild in just the last two years.

GB cod fairs no better. Based on the last accepted estimate, the stock was only 7 percent of its spawning stock biomass and experiencing overfishing.¹¹ Recent survey indices, the primary basis for assessing the fishery without an accepted analytical model, confirm low abundance.¹² The stock also exhibits a severely truncated age structure.¹³ Although precise projections cannot be made, there is no reason to expect that GB cod will meet its 2026 rebuilding date.

⁴ NEFSC, Operational Assessment of 14 Northeast Groundfish Stocks, Updated Through 2018 (pre-publication copy), October 3, 2019 at 26 and 38. Available at: <https://www.nefsc.noaa.gov/saw/2019-groundfish-docs/Prepublication-NE-Grndfsh-10-3-2019.pdf> (“2019 Groundfish Operational Assessment”); Per NMFS policy, “where a known determination had previously been provided and a new assessment is rejected or the results are inconclusive, the [last] known status will continue to be the official stock status.” Letter from John K. Bullard to John F. Quinn, August 31, 2017, p. 2. Available at: https://s3.amazonaws.com/nefmc.org/A8_170831_Bullard-to-Quinn_Groundfish-Inadequate-Rebuilding-Progress.pdf.

⁵ 2019 Groundfish Operational Assessment at 26.

⁶ NEFSC 2019. Gulf of Maine Atlantic Cod. 2019 Assessment Update Report Draft Supplemental Tables at 24.

⁷ NEFSC 2017. Gulf of Maine Atlantic Cod. 2017 Assessment Update Report Draft Supplemental Information.

⁸ 2019 Groundfish Operational Assessment at 29.

⁹ *Id.*

¹⁰ Memorandum from Groundfish Plan Development Team to Scientific and Statistical Committee regarding Candidate Groundfish OFLs and ABCs for fishing years 2020 to 2022 (Oct. 10, 2019 & revised Oct. 15, 2019) at 7. Available at: https://s3.amazonaws.com/nefmc.org/A.8-GF-PDT-memo-to-SSC-re-FY2020-FY2022-Groundfish-OFLs-ABCs_20191001-REVISED.pdf.

¹¹ NEFSC 2013. 55th Northeast Regional Stock Assessment Workshop (55th SAW). Assessment Summary Report. NEFSC Reference Document 13-01.

¹² NEFSC 2019. Georges Bank Atlantic Cod Tables (Draft; Supplement to 2019 Operational Groundfish Assessments) at 10.

¹³ 2019 Operational Groundfish Assessments at 40.



FY 2020-2022 Specifications

To comply with the MSA, the Council must propose in Framework 59 FY 2020-2022 specifications for GOM cod and GB cod that end overfishing immediately and place these stocks on appropriate rebuilding trajectories.

For GOM cod, a stock that cannot rebuild on schedule even without fishing, the ABC control rule is unequivocal: “For stocks that cannot rebuild to B_{MSY} in the specified rebuilding period even in the absence of fishing, the ABC should be based on incidental bycatch, including a reduction in the bycatch rate (i.e., the proportion of the [cod] stock caught as bycatch).”¹⁴ Given the current status of GOM cod, there is no rationale for the Council to deviate from the ABC control rule. ABCs set at $75\%F_{MSY}$, as suggested by the SSC for Framework 59, have repeatedly failed to end overfishing. Further, the SSC relied on anecdotal economic considerations – not relevant to the legal requirement to end overfishing immediately – to recommend an ABC that was even higher than the default control rule. In Framework 59, the Council must propose FY 2020-2022 ABCs, and subsequent ACLs, for GOM cod based on incidental catch, including a reduction in bycatch rate, to end overfishing immediately and support rebuilding of the GOM cod stock as required by the control rule and the MSA.

For GB cod, the Council should use the utmost caution when proposing specifications given the inability to quantifiably assess the stock. To that end, at a minimum, the Council should reject the Groundfish Committee’s recommended ABC, which was derived by an inconsistent utilization of the empirical approach compared to previous years. During the 2015 operational assessment for GB cod – when the analytical model was rejected – “the Operational Assessment Panel recommend[ed] that the *overfishing limit (OFL)* should be a proportion of the most recent 3-year average catch, and that proportion should be determined by recent survey trends.”¹⁵ Using the proportion of the most recent 3-year average catch to recommend *an ABC, not an OFL*, as the SSC and Groundfish Committee have done, is inconsistent with the original intent of this approach and removes a critical scientific uncertainty buffer for the stock, as described in the SSC’s minority report.¹⁶

Ultimately, however, the empirical approach (and the specifications derived from it) has repeatedly shown itself as being inadequate to end overfishing immediately and rebuild the GB

¹⁴ Amendment 16 to the Northeast Multispecies Fishery Management Plan at 78-79. Available at: http://archive.nefmc.org/nemulti/planamen/Amend%2016/final%20amendment%2016/091016_Final_Amendment_16.pdf.

¹⁵ 2015 Operational Assessment for Georges Bank cod at 39. Available at: https://www.nefsc.noaa.gov/publications/crd/crd1524/Individual%20Stocks/GB_Atlantic_cod.pdf.

¹⁶ Memorandum from SSC to Tom Nies, “Terms of Reference – Overfishing levels (OFLs) and acceptable biological catch (ABC) recommendations for groundfish stocks for fishing years 2020 to 2022 at 12-13. Available at: https://s3.amazonaws.com/nefmc.org/3g_SSC_response_GFSpecies_Oct17_FINAL.pdf.



cod stock. Therefore, it should not be used to propose FY 2020-2022 specifications in Framework 59. Given the continued overfished status and known chronic overfishing of GB cod, as well as the stock's unlikely ability to rebuild by 2026, CLF asserts that there should be no directed fishery for this stock. As with GOM cod, specifications should be based on incidental catch with measures to reduce bycatch rate over the FY 2020-2022 period.

Lastly, the Council should consider how to comprehensively address the biases and uncertainties that have resulted from the lack of adequate monitoring in this fishery. As it is currently impossible to set specifications using accurate and precise data, completing Amendment 23 should be the Council's highest groundfish priority in 2020.

Thank you for considering these comments.

Sincerely,

Allison Lorenc
Policy Analyst

Peter Shelley
Senior Counsel

Erica Fuller
Senior Attorney

Cc: Michael Pentony

Sherie Goutier

From: Rick Beal <rickbeal520@comcast.net>
Sent: Friday, November 22, 2019 11:02 AM
To: info info
Subject: Fwd: By-Catch and Monitoring



----- Original Message -----

From: Rick Beal <rickbeal520@comcast.net>
To: jquinnfish@gmail.com, michael.pentony@noaa.gov
Date: November 22, 2019 at 11:00 AM
Subject: Fwd: By-Catch and Monitoring

----- Original Message -----

From: Rick Beal <rickbeal520@comcast.net>
To: m
Date: November 22, 2019 at 10:43 AM
Subject: Fwd: By-Catch and Monitoring

----- Original Message -----

From: Rick Beal <rickbeal520@comcast.net>
To:
Date: November 21, 2019 at 6:26 AM
Subject: By-Catch and Monitoring

To All in fisheries

management

Let me start by saying that I speak only for myself and no other person or organization. I have been a commercial fisherman for 53 yrs. I have seen, and in fact been part of, the wasteful practices of the distant past I am a strong advocate for the reasonable and fact based regulations that have been implemented and applaud the management industry for doing so. But today I'd like to speak about the need for, and burden of, increased observer coverage and or electronic monitoring.

It is a fact that total discard is directly proportionate to total effort. Thirty-Five years ago over a hundred boats would leave the shores of Cape Ann daily to fish for ground-fish in the Western Gulf of Maine. Today there are at most a dozen that adds up to a reduction of approx 90%. Add to that the fact that the few of us still here, constrained by either the days at sea program of the past or the quota system of today, now fish half the time we did in the past the percentage of effort is even lower. Consequently total discard must be at an all time low. I am a strong supporter of the at sea observer program and in the past

je 11/25/19

have put this in writing. I understand and support the need for real time information to support fact based management. But I also know that a substantial increase in coverage coupled with the shift of financial responsibility to the fleet would, at least to the part of the fleet I am involved in, make operations financially untenable, leaving myself and others unable to support our families.

It's my understanding that electronic monitoring would put the responsibility of sorting by-catch on the vessel and crew. Although this is a small percentage of our catch it would still be an increased burden in terms of time, labor and expense. Over years, first because of lack of fish, and now because of lack of quota, vessels have had to cut back on personnel to remain solvent. Operations that employed 3-4 people now employ 2 and many fish alone.

Recently, due to good management and strict compliance by the fleet, there has been resurgence of several fish stocks. This is seasonal in nature and due to its seasonality does not promote the hiring of additional personnel. At times this leaves 1 and 2 person vessels doing the work that took 3-4 people in the past. Sorting and attempting to return by-catch to sea in a timely manner would undoubtedly increase fatigue. Fatigue's consequences are lapses in procedure and mental awareness. I have been both witness and victim to this and it is dangerous.

These are facts that will likely be ignored, for it has been stated by some in management that they have neither the time nor the inclination to listen to small stakeholders, the people that built industry, or dissenting views. The die has been cast. Consolidation is coming, in fact it's well on its way. An industry that for generations has prided itself on hard work and independence is going the way of the dinosaur and all in the management industry either through advocacy or by complacency will be complicit in its demise.

Richard

Beal Gloucester, Ma

Sherie Goutier

From: Rosario, Fernando G <fr216067@bhcc.edu>
Sent: Thursday, January 16, 2020 6:26 PM
To: comments
Subject: regarding the 2020 Gulf of Maine recreational cod season and possession limits.

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

Fernando Rosario
Sent from my T-Mobile 4G LTE Device

Sherie Goutier

From: Lyle Morris <bigtuna13@icloud.com>
Sent: Thursday, January 16, 2020 6:25 PM
To: comments
Subject: Recreational cod

please take 3 minutes and fire off an email.

it could mean the difference of allowing cod to be taken in the spring

Send in your comments. BY 8PM TONIGHT YOU SLACKERS if you would like an additional 2 weeks to catch cod this year. !

send Cod Comments to: comments@nefmc.org

below is a sample letter if you just want to copy and paste.

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,
Sent from my iPhone

Sherie Goutier

From: Keith Baker <kellyannfishing@yahoo.com>
Sent: Thursday, January 16, 2020 8:00 AM
To: comments
Subject: Cod

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Keith Baker

Sent from my iPad

Sherie Goutier

From: Eric Morrow <fishbountyhunter@gmail.com>
Sent: Thursday, January 16, 2020 7:57 AM
To: comments
Subject: GOM 2020 Cod proposals

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Logan Avery (Crew)

Bounty Hunter Charters

Fairhaven / Plymouth

Sherie Goutier

From: Eric Morrow <fishbountyhunter@gmail.com>
Sent: Thursday, January 16, 2020 7:54 AM
To: comments
Subject: 2020 GOM Cod Regulations

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Eric Normad (crew)

Bounty Hunter Charters

Fairhaven MA

Sherie Goutier

From: eric morrow <capteric@fishbountyhunter.com>
Sent: Thursday, January 16, 2020 7:50 AM
To: comments
Subject: GOM Cod 2020 Comment period

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Capt. Eric Morrow
Bounty Hunter Charters
Fairhaven, MA
508-748-3474

Sherie Goutier

From: Ray Castano <r.castano@comcast.net>
Sent: Thursday, January 16, 2020 7:46 AM
To: comments
Subject: 2020 Gulf of Maine recreational cod season

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely, Raymond V. castano

Sent from Rays iPad

Sherie Goutier

From: jay <jay@doyonsappliance.com>
Sent: Thursday, January 16, 2020 11:35 AM
To: comments
Subject: Cod

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Jay Ponte
Store Manager
Doyons Modern Home
40 North Rd.
Bedford, Ma 01730
781-275-4100
781-275-4110 (F)



Sherie Goutier

From: Terry Dolan <terrydolan7@gmail.com>
Sent: Thursday, January 16, 2020 2:02 PM
To: comments
Subject: Recreational cod regulations

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Terrence Dolan
Quincy Massachusetts
508.345.5797

Sherie Goutier

From: Wesley Mcrae <wmhunts@gmail.com>
Sent: Thursday, January 16, 2020 2:09 PM
To: comments
Subject: Cod

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,
Wesley McRae

Sherie Goutier

From: Tom Pappa <tomp@espressoplus.com>
Sent: Thursday, January 16, 2020 2:34 PM
To: comments
Subject: Cod Restrictions

To Whom it May Concern,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Tom Pappa

Sherie Goutier

From: Captain Jon <onthesidecharters@gmail.com>
Sent: Thursday, January 16, 2020 2:40 PM
To: comments
Subject: Cod Season

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Capt. Jonathan Carey
On the Side Charters

Sherie Goutier

From: Pete Aylward <peterpiper537@yahoo.com>
Sent: Wednesday, January 15, 2020 9:25 PM
To: comments
Subject: 2020 Gulf of Maine recreational cod season

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely,

Peter Aylward

Sherie Goutier

From: Mike Delzingo <ff_boston@yahoo.com>
Sent: Wednesday, January 15, 2020 5:38 PM
To: comments
Subject: cod comments

As a member of the Stellwagen Bank Charter Captains Association I agree with their stance on the upcoming 2020 cod regulations.

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

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Sincerely

Captain Mike Delzingo

Fishbucket Sportfishing Boston

Sherie Goutier

From: colleary@quikus.com
Sent: Wednesday, January 15, 2020 2:50 PM
To: comments
Subject: 2020 GOM Cod

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

Michael Colleary

Recreational Fishermen SBCBA

Sherie Goutier

From: Jeffrey Fontes <twocaptainscharters@gmail.com>
Sent: Tuesday, January 14, 2020 7:57 PM
To: comments
Subject: NEFMC Groundfish regs

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

Captain Jeffrey Fontes
Two Captains Charters

--

Captain Jeff Fontes
978-360-3245
Two Captains Charters

Sherie Goutier

From: John Richardson <je.richardson.builder@gmail.com>
Sent: Tuesday, January 14, 2020 3:15 PM
To: comments
Subject: 2020 Gulf of Maine recreational cod possession limits

Capt. John Richardson

43 Valley Beach Ave

Hull, MA 02045

Re: 2020 Gulf of Maine recreational cod season and possession limits

NEFMC Executive Director Tom Nies

Dear Mr. Nies,

The 2017 Gulf of Maine recreational cod season had a zero possession limit. The 2018 limit was 1 cod per person, only from September 15 to September 30. In both years the catch was under the Recreational GOM cod ACL.

Reacting to the 2019 NMFS Science Center's estimates, the Recreational Advisory Panel, the Groundfish Committee, and the New England Fishery Management Council approved an additional single cod from April 15, 2019 to April 30, 2019.

This action by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony. If approved, the additional two-week recreational spring season would have been welcome two fold relief to the for-hire fleet. They were once was nearly completely dependent upon cod, and therefor any increase in catch allowance goes a long way to creating more attractive charters. The more favorable weather of the April time slot is also important. And again the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

Capt. John Richardson

Stellwagen Bank Charter Boat Association Member and Trustee

Sherie Goutier

From: Rick Golden <1620anglers@gmail.com>
Sent: Monday, January 13, 2020 6:40 PM
To: comments
Subject: Cod & Haddock Comments

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely

Rick Golden

1620 Anglers

Cell: 508-818-0881

1620anglers@gmail.com

www.1620anglers.com

Sherie Goutier

From: charlie wade <cwade440@yahoo.com>
Sent: Monday, January 13, 2020 1:46 PM
To: comments
Subject: 2020 GOM Cod Measures

Dear Executive Director Nies,

I'm writing about the 2020 Gulf of Maine recreational cod season and possession limits. There was no possession of GOM cod during the entire 2017 season, and the 2018 season had a 1 cod per person limit from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,
Captain Charlie Wade
Rochester, MA

jc 1/14/20

Sherie Goutier

From: John <jp36lr33@aol.com>
Sent: Wednesday, January 1, 2020 5:12 PM
To: comments
Subject: Recreational GOM Cod Regulations 2020

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

John Parkinson

Attleboro, MA

Sent from my iPad

jc 1/1/20

Sherie Goutier

From: kyle Wiley <kylewiley9383@yahoo.com>
Sent: Tuesday, December 31, 2019 1:39 PM
To: comments
Subject: Cod season opening

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

This approved motion by the NEFMC was ultimately disapproved by the Greater Atlantic Region Fisheries Office Regional Administrator, Michael Pentony, who claimed he had "conservation concerns." If he had approved the additional two-week recreational spring season, it would have resulted in anglers being able to get out on the water in more favorable weather, have a bonus fish to take home, and the recreational GOM cod ACL would likely not have been exceeded.

I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

Kyle Wiley

Sent from my iPhone

jc 1/2/20

Sherie Goutier

From: Eric Morrow <fishbountyhunter@gmail.com>
Sent: Thursday, January 16, 2020 7:56 AM
To: comments
Subject: 2020 GOM Cod Proposal

Dear Mr. Nies,

I am writing to you regarding the 2020 Gulf of Maine recreational cod season and possession limits. During the 2017 season there was no possession of GOM cod, and the 2018 season was a limit of 1 cod per person from Sep 15th to Sep 30th. This resulted in the catch being under the Recreational GOM cod ACL in both years, which left uncaught fish in the water that had been designated to the recreational sector.

During the winter of 2019, the National Marine Fisheries Service's Science Center stated that anglers could be allowed a single cod from April 15th to April 30th (along with the 2-week September opening) without going over the recreational ACL. This was approved by the Recreational Advisory Panel, the Groundfish Committee, and the full New England Fishery Management Council.

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I am requesting that both the NEFMC and GARFO allow an additional two weeks for anglers to retain a single cod in May of 2020 in addition to a two-week period in August. Changing the season to August instead of September permits anglers to head offshore during a month when sea conditions are normally more favorable and safer for small-boaters and the for-hire fleet.

Sincerely,

Jillian Wood (crew)

Bounty Hunter Charters

Fairhaven MA