ADDITIONAL CORRESPONDENCE

From: Eben Nieuwkerk <fvrestless@icloud.com>
Sent: Monday, April 6, 2026 6:31 PM
To: comments <comments@nefmc.org>
Subject:

Hello this is eben nieuwkerk with the de dee mea and white cap, I have a lot of concern of the proper use of the (red fish catching program) it is not being used to solely catch red fish. The boats are using the red fish program to target small haddock and small pollock. Brian Pierce, Jordy king and my father Knoep nieuwkerk have been Groundfishing over 30 years and have never seen a 19" pollock that has viable spawn in it. The GOM pollock does not have viable spawn until 22-27 inches long, the majority of the females have to be 27 long. The MSA state's specifically if your targeting species in witch a no lease cost fish (pollock caught with reds) is a highly targeted species using under sized mesh to kill small fish before proper spawning is against MSA.

their is a very good stock of small pollock coming up, I would really like to see a lot of small boat Gillnetters have a chance on these fish, theirs a growing group of Gillnetters out of Portland that could really benefit from being able to harvest these fish as mediums and larges. We cannot catch them though if they're caught at 19" we won't ever mesh them as our mesh is 2" larger than what the trawlers are using. We as Gillnetters thrive on large pollock that's mostly what we catch, we get about 60/40 large and mediums and last year because all the fish are being caught before the Gillnetters can mesh them you can see only 03 percent of the pollock was landed as larges, that's not because we can't catch them as larges it's because they weren't given a chance to properly grow to a large.

We have a lease cost on haddock cod hake sole and in the past dabs,

Target species would be dabs reds pollock and monk.
Monk is still DAS and still doing good.
Reds and pollock have the most value and this red fish program gave the biggest baddest boats with the most hp the most opportunities to catch them. That's not how MSA works not one group is suppose to have all the catching power its states on my permit equal opportunity fishery.

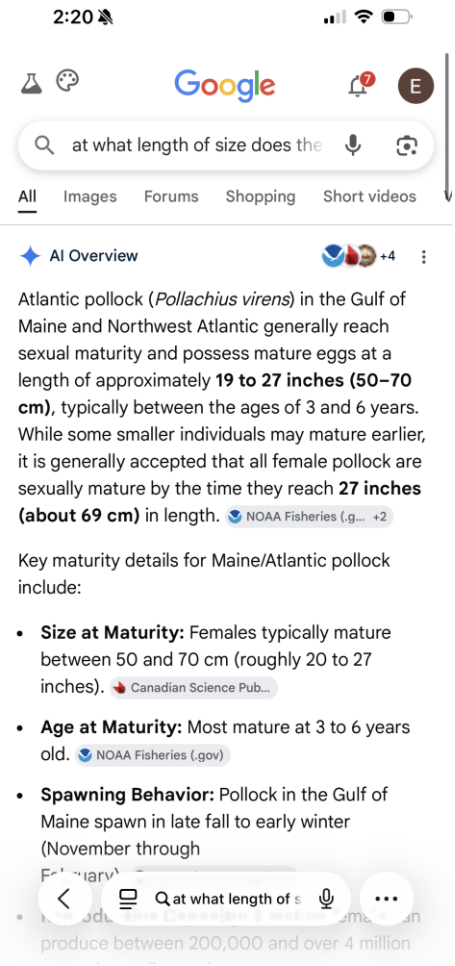
Are you as the council ok with knowing and agreeing with this program knowing it's hurting small boat family's and fishermen? Are you ok with boats like miss trish coming in with thousands of pounds of under sized haddock? There is many vessels like them that are being caught bringing in thousands of pounds of under sized haddock and being fined for it but get to keep using this 5.5" program. Every under sized fish landed and sold is hurting the boats like mine that fish legal 6.5" to sustainably harvest that reproduce viably. The pollock information below was taken from NOAA's website. This proves that the red fish program is in violation of MSA by using it to target fish that arnt having a mature reproduction cycle and being caught by and sold prematurely of reproductive cycle.

If the red fish program had only a 05 percent retention of other ground fish it would be a viable fishery. But 50/50 makes it a dirty and unhealthy fishery that is depleting the stocks of fish for alll of the fishermen except the 75 foot and up boat class size.

Theirs no need to allow these boats to use 5.5"
To target dabs monk sole haddock pollock their is a very high discard rate hence why we

implemented the 6.5” not 5.5” we all want more fish for next year and the year after, I would really like to be able to make a living consistently as a small boat Gillnetter/trawler and this program I can see is hurting my friends and family. The whole purpose of the red fish program is to land red fish. Not pollock not haddock not sole not dabs not hake not whiting.
It’s a red fish exemption program and needs to be treated and fished so.

Please consider how this program is affecting the small boat Gillnetter fleet, and how there is no longer any large pollock, a strong biomas shows larges mediums and smalls. We had 03 percent large pollock landed 2025 that’s a bad sign and not a strong biomass.



Sent from my iPhone

From: NOAA Fisheries Greater Atlantic Region <garfo.noaafisheries@public.govdelivery.com>
Sent: Monday, April 6, 2026 1:24 PM
To: Cate O'Keefe <cokeefe@nefmc.org>
Subject: NOAA Fisheries Removes Regulations Prohibiting Commercial Fishing in the Northeast Canyons and Seamounts Marine National Monument

April 6, 2026

NOAA Fisheries Removes Regulations Prohibiting Commercial Fishing in the Northeast Canyons and Seamounts Marine National Monument

The Northeast Canyons and Seamounts Marine National Monument was established by Presidential Proclamation, under the authority of the Antiquities Act. Commercial fishing was prohibited within the monument via Presidential Proclamations 9496 and 10287, respectively. In 2024, NOAA Fisheries incorporated the Monument boundaries and commercial fishing prohibition into the regulations at 50 CFR 600.10 and 600.725(x). This rule conforms U.S. fishing regulations to the Presidential Proclamation *Unleashing Commercial Fishing in the Atlantic*, which removed the prohibition on commercial fishing within the Monument. Commercial fishing is allowed within the Monument, consistent with all other applicable regulations, including the implementing regulations for the New England Fishery Management Council's Deep Sea Coral Amendment, found at 50 CFR 648.373, as follows:

1. Commercial red crab fishing anywhere within the boundaries of the Monument;
2. Commercial Atlantic Highly Migratory Species and pelagic fishing anywhere within the boundaries of the Monument; and

3. Bottom-tending gear to be fished in the portion of the Monument that does not overlap with the Georges Bank Deep-Sea Coral Protection Area, including trap/pot gear, otter trawl, dredge, etc.

For more information, read the final rule as filed in the *Federal Register* and/or the Fishery Bulletin for this action.

Questions?

Fishermen: Contact Allison Murphy, Sustainable Fisheries, 978-281-9122

Media: Contact GARFO Public Affairs

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

April 6, 2026

Daniel Salerno, Chairman
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, Massachusetts 01950

Dear Dan:

I am pleased to inform you that today I approved Amendment 25 (Revised) to the Northeast Multispecies Fishery Management Plan (FMP) on behalf of the Secretary of Commerce.

As you know, Amendment 25 (Revised) to the FMP revises the stock definitions for Atlantic cod managed in the FMP and includes measures in the FMP necessary to manage four stocks of Atlantic cod in U.S. waters. Under the Amendment, the four Atlantic cod stock units in the FMP are:

1. A new stock unit of Eastern Gulf of Maine (EGOM) cod;
2. A new stock unit of Western Gulf of Maine (WGOM) cod;
3. A revised stock unit of Georges Bank (GB) cod; and
4. A new stock unit of Southern New England (SNE) cod.

Amendment 25 (Revised) also includes the following management measures necessary to manage these four stocks of Atlantic cod in U.S. waters:

- Definitions for the stock areas for each of the four cod stocks;
- Status Determination Criteria for the four cod stocks;
- Specifications for the four cod stocks for fishing year 2026;
- An apportionment method for setting the WGOM cod commercial sub-annual catch limits (ACL);
- Management uncertainty buffers for the four cod stocks;
- Recreational sub-ACLs for WGOM and SNE cod;
- Common pool trimester total allowable catch (TAC) distributions, TAC closure areas, and baseline common pool trip limits for the four cod stocks;
- A regulatory process for the Regional Administrator to set recreational measures for GB and EGOM cod for fishing year 2026; and
- Recreational measures for EGOM, WGOM, GB, and SNE cod.

We published a Notice of Availability (NOA) for Amendment 25 (Revised) in the *Federal Register* on January 13, 2026 (91 FR 1257), with a comment period that ended on March 16, 2026. In response to the NOA, we received 261 public comments submitted by the Massachusetts Division of Marine Fisheries (MADMF); Oceana; The Nature Conservancy (TNC); Gloucester Fishing Community Preservation Fund (GCFPF) and the Northeast Seafood Coalition (NSC); Maine Coast Fishermen's Association (MCFA); Conservation Law Foundation (CLF); Natural Resources Defense Council (NRDC), Ocean Defense Initiative (ODI), and CLF; Sustainable Harvest Sector (SHS); one company associated with the fishing industry; and 252 members of the public, including both commercial and recreational fishermen.

Comments broadly supported the approval and quick implementation of Amendment 25 (Revised). We did not receive any comments urging the disapproval of the Amendment or opposing Amendment 25 (Revised) overall. We received comments about delays in the Agency review of the original Amendment 25 and the timing of our rulemaking. The vast majority of comments focused on approving the amendment and implementing regulations by the beginning of the 2026 fishing year. Commenters also focused on the timing of the next phase of the Council's development of cod management measures and the need for deliberate and careful consideration before implementing any new allocation measures. Some comments expressed concern about a small portion of the measures that will be implemented under Amendment 25 (Revised) but did not oppose the amendment overall.

We published a proposed rule that included implementing regulations for the management measures in Amendment 25 (Revised) on March 18, 2026 (91 FR 12993). The comment period on the proposed rule ends on April 17, 2026. A final rule implementing Amendment 25 (Revised) management measures will be published after the proposed rule comment period and after May 1, 2026. While the Amendment 25 (Revised) final rule is pending, we intend to implement default allocations for two stocks of cod (Gulf of Maine and Georges Bank). These allocations will equal 75 percent of the cod allocations included in the fishing year 2025 emergency action (May 2, 2025; 90 FR 18804) and extension (October 3, 2025; 90 FR 47989).

We appreciate the efforts of the Council and staff on this action, as well as ongoing efforts to improve the overall Northeast multispecies fishery. Please contact me or Heather Nelson in our Sustainable Fisheries Division at (978) 281-9334 if you have any questions.

Sincerely,

Michael Pentony
Regional Administrator

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

Dear Council Chair Daniel Solano,

4-8-2026

It has been brought to my attention that the southern windowpane flounder and Ocean Pout Small a.m. Area will be closing May 1st because of ACL quota overages. This area made up of south of Block Island and from Montauk Point South to the 40° 50-minute line. This is a general description, but it encompasses the grounds on which we drag for Little Skate in the Skate Bait industry this time of year. I have sent a picture of the legend to give you a better idea. This area will completely close the fishing area because East of this proposed closure area, it is unfishable due to construction of windmills encompassing twice as much area as the windowpane closer. As a result, this leaves fishermen no area to go because it's completely closed now. I suggest more conversation in an emergency action to stop this May 1st action from happening. This windowpane and Ocean Pout Closure will close from Montauk Cox's Ledge, adding all the windmill closures to the east. This will have a devastating effect on the fishermen that fish these waters, the local communities, and the lobstermen who purchased the bait who have also voiced their concerns and very worried. This situation will not allow us to continue business as usual, and this action will have a devastating effect on all of us.

The Council's timely attention to this matter is greatly needed to prevent the devastating consequences that could occur from this action.

Thank you,
Dan Nordstrom - Fisherman and Skate Advisor to The Northeast Skate Committee
508-294-4160

I want to give you all a heads up on an issue that the SNE trawl fleet will have to deal with starting May 1. Based on final FY 2024 catch accounting which was just recently completed, NMFS has determined that there were ACL quota overages for both southern windowpane flounder (207.5 %) and ocean pout (118.0 %). Because of these overage, NMFS will be implementing predetermined accountability measures for both stocks which are area based, trawl gear restricted measures. If you recall from the last time this occurred, vessels fishing within these areas will now be restricted to using selective gear only (haddock separator trawl, Ruhle trawl, or a rope separator trawl).

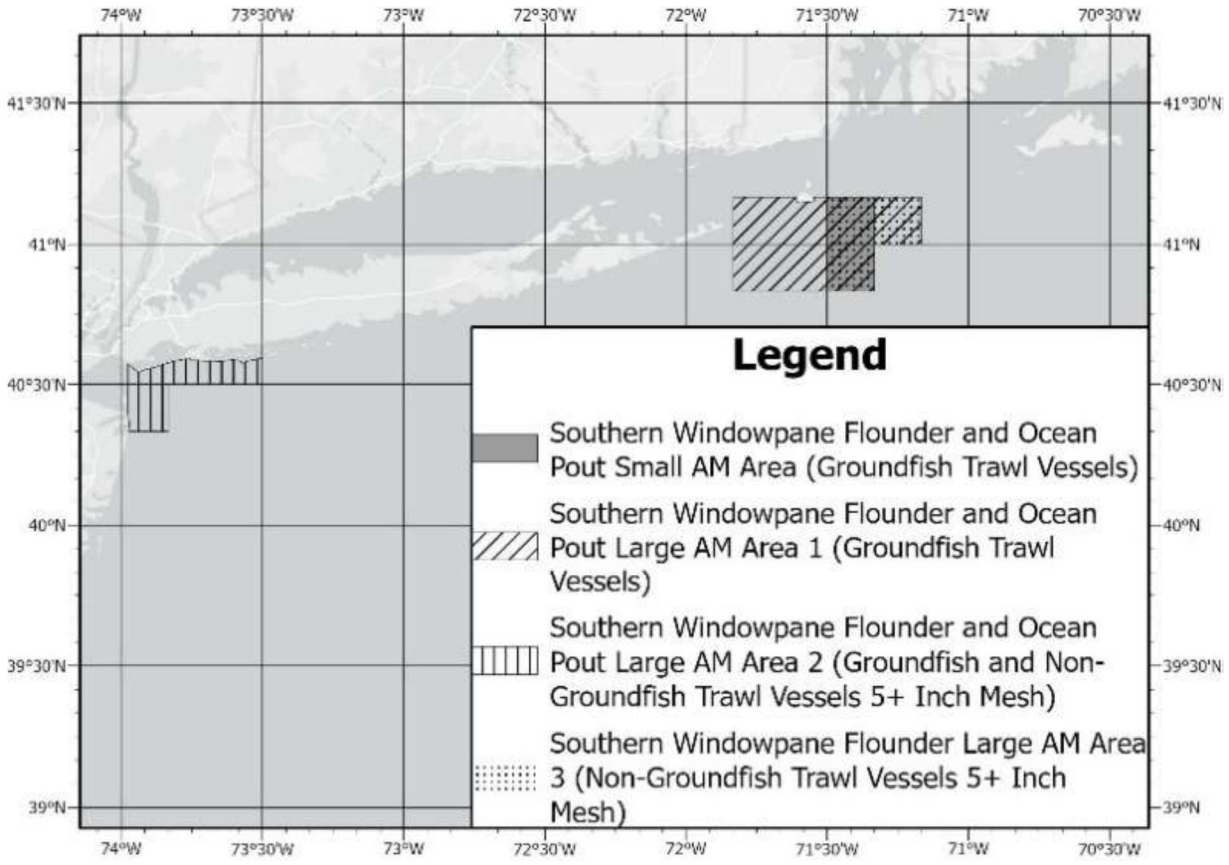
The southern windowpane flounder large AM area will be implemented which encompasses two areas, one around Block Island and the other in the entrance to the Lower Hudson Bay region. For ocean pout, the small AM area will be implemented which also encompasses two area, one that overlaps with the southern windowpane area in the Block Island region, and the other that is just southwest of Georges Bank Closed Area II. See below for maps and coordinates of the areas.

As a reminder, the southern windowpane AM is applied to all groundfish trawl vessels (both sector and common pool) as well as non-groundfish trawl vessels using a codend mesh size of 5 inches or greater. The ocean pout AM is applied to only groundfish vessels (both sector and common pool).

There are two triggers that can used to reduce the size or duration of the southern windowpane accountability measure.

1. The size of the southern windowpane AM area may be reduced if the stock is considered rebuilt (YES for southern windowpane) and recent survey information suggests that the excess catch did not have a substantial impact on the stock.
2. The duration of the southern windowpane AM may be shortened if FY 2025 catch accounting (which will occur in September 2026) determines that there is underage.

Unfortunately for ocean pout, there are no such triggers and therefore the AM will be in place for the entire fishing year.


74°W
73°30'W
73°W
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41°30'N
41°N
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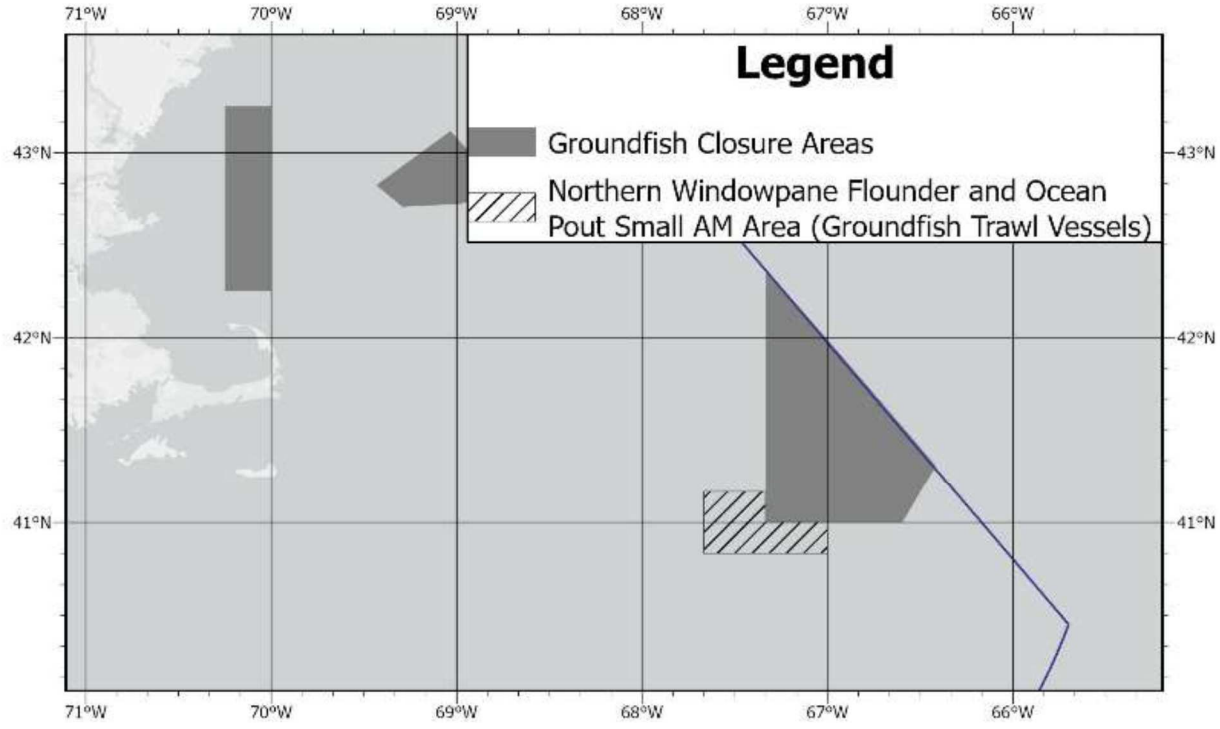
40°N
39°30'N
39°N
Legend
Southern Windowpane Flounder and Ocean Pout Small AM Area (Groundfish Trawl Vessels)
Southern Windowpane Flounder and Ocean Pout Large AM Area 1 (Groundfish Trawl Vessels)
Southern Windowpane Flounder and Ocean Pout Large AM Area 2 (Groundfish and Non-Groundfish Trawl Vessels 5+ Inch Mesh)
Southern Windowpane Flounder Large AM Area 3 (Non-Groundfish Trawl Vessels 5+ Inch Mesh)


71°W
70°W
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67°W
66°W
43°N
42°N
41°N
Legend
Groundfish Closure Areas
Northern Windowpane Flounder and Ocean Pout Small AM Area (Groundfish Trawl Vessels)

Southern Windowpane Large AM Area 1

Point	Lat	Lon
1	41 10	71 50
2	41 10	71 10
3	41 00	71 10
4	41 00	71 20
5	40 50	71 20
6	40 50	71 50

Southern Windowpane Large AM Area 2

Point	Lat	Lon
1	(southern coast of LI)	73 30
2	40 30	73 30
3	40 30	73 50
4	40 20	73 50
5	40 20	(eastern coast of NJ)
6	(northern coast of NJ)	73 58.5
7	(southern coast of LI)	73 58.5
8	40 32.6	73 56.4

Southern Windowpane Large AM Area 3

Point	Lat	Lon
1	41 10	71 30
2	41 10	71 10
3	41 00	71 10
4	41 00	71 20
5	40 50	71 20
6	40 50	71 30

Ocean Pout Small AM Area 1

Point	Lat	Lon
1	41 10	71 30
2	41 10	71 20
3	40 50	71 20
4	40 50	71 30

Ocean Pout Small AM Area 2

Point	Lat	Lon
1	41 10	67 40
2	41 10	67 20
3	41 00	67 20
4	41 00	67 00
5	40 50	67 00
6	40 50	67 40

Dear Chairman Dan Salerno,

I am writing this comment about the Special Exemption Program.

Figure 3, page 22, in the redfish report are the length frequencies for discarded fish and landed fish.
The length frequencies are for large mesh, Part A, of a redfish trip, and the length frequencies for small mesh, Part B, of a redfish trip.

There is no evidence of any selectivity for the 2 mesh sizes, meaning the large mesh and small mesh caught exactly the same size fish. You can see this on the graph for redfish, pollock, haddock, dabs and witch flounder. The lines on the graph overlap perfectly. This means that the captains used the same exact mesh size for Part A and Part B of the redfish trips. This graph shows data from 4 years and 18 different participants.

Fisherman and marine biologists can attest to the fact that a 5.5" mesh codend is going to retain smaller fish and a 6.5" inch mesh codend is going to allow more escapement of small fish.

If the fisherman was using a 6.5" mesh you would see on the graph less small fish in the kept catch. If a fisherman was using 5.5" mesh then you would see more small fish in the kept catch.

The same can be said for discarded fish, the large mesh would have fewer small sized discards. The small mesh would have more small sized discards.

There is a simple mathematical equation that scientist use, in order to know what size fish can escape from a net or be retained in the net.

The mesh size is actually a flattened circle.

You measure the distance from knot to knot of one mesh, because the mesh is a continuous loop of twine. The 6.5" measurement represents two parallel sides, So you multiply 6.5 x 2=13. That is the circumference of the opening of the 6.5" mesh.

If we look at an 18 inch pollock, the thickest part (the girth) of the pollock is 10 inches. That means if the mesh size is 6.5" that the pollock has 3 inches of extra room to slide through the 13 inch opening.

In Figure 3, page 22, the graph shows that the small mesh and the large mesh have the same exact length frequencies for discards and landings. The 18" inch pollock were retained in the net, for both large mesh and small mesh. The large mesh should not have retained the 18" pollock, if a 6.5" mesh size was being used for Part A of the exemption trip. The pollock would have had 3 inches of wiggle room to escape. This shows the vessels were using a mesh size smaller than 6 1/2 inch mesh.

The same is true for the length frequencies of haddock, dabs, greysole, and redfish in figure 3, page 22 of the report.

There were 18 different participating vessels over 4 years. The only way all of the discards and all of the landings would be overlapped in the graph is if all the vessels were all using the exact same mesh size. We don't know what mesh size was actually used to harvest the fish because there was only one physical boarding by the Coast Guard and Federal Enforcement in 13 years (2012-2025). We also don't know if anyone has ever measured the extension of the net, ever.

I believe it is important to measure the extension because this is the part where the fish escape, or are retained. Once the fish are herded into the body of the net, they go into the extension. This is where the smaller fish have a chance to escape. If the fish are too large to escape, they tire, and die, and they fall into the codend.

This is important because the fish don't escape out of the codend. They only escape out of the extension. They are dead when they reach the codend.
If the extension is made sublegal mesh and it is being pinched off with twine, nobody on deck would know, because the twine breaks, and all the fish dump into the codend.

The at-sea-monitors are not required to measure the extension. Only the Coast Guard and Federal Fishery Agents can measure the extension.

The at-sea-monitors are on the vessels for scientific, biological data collection only. They are not Enforcement officers.

The Redfish Exemption Report stated that there was one special operation boarding with the Coast Guard and Federal Enforcement Officers at the end of 2021. They did one boarding. That was the only boarding for the redfish program for the last 13 years.

I believe National Standard 1 is being violated.

National Standard 1: Optimal Yield

"Conservation and management measures shall prevent over fishing while achieving, on a continuing basis the optimum yield.."

If Enforcement boardings occur only once every thirteen years, there is no way for the council to verify that the gear being used, matches what is reported on 'paper'. Without enforcement, "overfishing cannot be prevented because there's no deterrent for using illegal mesh sizes or extensions. This undermines the biological integrity of the entire fishery."

We were told by the presenter of the redfish review report, that VTR's were used to verify a 6.5" mesh size, for Part A.
A redfish regulation states that the small mesh codend must be stowed under the deck during Part A of the trip. Before they deploy the net, in Part B of the trip, the 6.5 " codend has to be removed and the 5.5" mesh codend has to be sewn on. I asked at the same meeting if the observers take note and write it on a report, of when the 6.5" inch mesh codend was taken off of the extension, and at what point the 5.5" mesh codend was sewn onto the extension, before they started Part B of their trip. I also asked at what point the observer measured the 5.5" codend, during the Part B of the trip. There wasn't anybody on the zoom meeting that could answer any of my questions about the mesh size.

We have had at sea monitors on our vessel. In the beginning, we thought that the monitors were supposed to watch for discarding of legal fish by the crew. But we were wrong. Glenn Chamberlain, who trains the observers, told us the first priority for at sea monitors is to weigh and measure the bycatch. Bycatch is lobsters, crabs, seaweed, rocks, scallops,

clams, whiting, etc. Bycatch in this situation is everything that isn't going to be sold.
When the bag of fish come aboard and is dumped the crew of the vessel picks through the pile and separates the fish by species. And while this is happening, the at sea monitor is weighing and measuring the bycatch. What we noticed is, it would be really hard at sea monitor to watch for the discards that may be occurring when the crew is sorting their pile.
I believe there may be 'high grading' or species that have a high lease cost that are getting dumped overboard because the observer is tasked with weighing and measuring the bycatch.

Also, the observer has to be able to sleep. When the observer sleeps, that leaves an opportunity for a lot of discarding. I am not, in anyway, saying an observer shouldn't sleep, I am just pointing out that there are eight hours a day, that discards are not being observed.

There are pressure sensors, called Codend Cover Sensors, Symmetry Sensors or Catch Sensors. The sensors can be put in the extension of the net and it would measure the pressure and know whether the extension was being pinched off. If the sensor is not showing any pressure then it means it was tampered with. OLE could immediately see this with a signal through Starlink. The Office of Law Enforcement could give an immediate stop fishing order and come straight in order. If the sensor was in a 5 gallon bucket instead of in the extension, it would give a signal to OLE for a stop fishing order.
There's also a method where they have a laser that can measure the mesh size of the net as it's being deployed and as it's being hauled back. This is in tandem with a sensor on the winch.
This would make it so that Federal Law Enforcement would not have to board the boat in order to see if the lengthener is choked off.
The sensor could detect if it was a 4", 4.5" or 5" inch mesh in the extension.

I'm advocating that we should use the sensors in tandem with 100% electric monitoring. With EM, the entire catch would be 100% observed. This electric monitoring is saved on a pen drive.

I think this would be cheaper than hiring at-sea-monitors. I have heard that it cost between $800 and $1000 per day for one day of at-sea-observer coverag. Electric monitoring doesn't cost the fishery anything.

A full sensor package to monitor the pressure in the extension might cost around $15,000-$20,000, but that is a one time investment. At-sea-monitoring costs $800-$1000 per day, in less than 30 monitoring days at sea the sensors have paid for themselves. There would still be annual maintenance costs.

While gear sensors require an initial investment, they are a one time cost that provides real world verification of the mesh sizes and whether or not the extension is getting choked off. When paired with free electronic monitoring.

I don't think NMFS and the NEFMC should keep having at-sea-monitors on the fishing vessels because of the tragic accident on the Lilly Jean. Twenty-two year old kids, that have graduated with a marine biology degree are often the observers that we've had on our boat.
There is no way, that NMFS can 100% guarantee that the vessels won't rollover and sink. I don't think NMFS should keep putting these kids at risk. This is another really good reason to go with electric monitoring.

This is 24 years of pollock data I requested from National Marine Fisheries Science Center.

I am including this data because NEFSC has said for the last five pollock assessments, 2010-2024, that there is a cryptic biomass of pollock that fisherman have not seen, and the trawl surveys and bottom long line surveys have not seen either. the computer model says there are massive amounts of large pollock out there, but nets can't find them.

The question is: Are we managing a massive population of pollock that we can't see, or are we overestimating a stock that isn't actually there?

The dome shaped selectivity model believes older, larger, pollock are out there, but are too smart and too fast to be caught by research trawls or commercial gear.

The model automatically creates a cryptic biomass of thousands of tons of fish that exist in the computer model, but never show up in the net.

The risk is: if these fish don't actually exist, the stock is actually flat topped, meaning we actually are catching the big ones and there just aren't many left.

If the cryptic biomass is a myth, meaning the big fish aren't hiding, and they just aren't there, then the base model, (the cryptic biomass model) is overestimating the ACL.
With a flat top model, the biomass of pollock is likely 50% lower than the scientist claim. The scientists could be setting catch limits based on 'ghost fish'.

The mesh size input being used for the dome-shaped model is 6 1/2 inches.

Because we have only had one physical boarding by law enforcement in 13 years, we don't have any physical proof of what size mesh is actually being used to catch pollock. Also, since the length frequencies in the redfish report were exactly the same, then we have to assume that Part A and part B of the exemption trips were using 5 1/2 inch mesh, or less. The fact is that the 18" discarded pollock could escape through a 6.5" mesh.
We also don't know whether or not the extension of the net has ever been measured. Therefore, we don't know if the lengthener has been choked off with a smaller size mesh, like 4.5".

I think it would be prudent to re-run the dome shaped model and the flat top model with a variety of mesh inputs, such as 5 1/2 inch mesh, 5 inche mesh and 4 1/2 mesh. This might provide a more realistic outcome for the models.

When it comes to the sustainability of groundfish stocks, we have to know exactly what mesh sizes are in the net. We have to be honest about the inputs.

We had a vibrant healthy spawning stock biomass of pollock up until 2014. We have noticed that the pollock used to come in and spawn off of our coast, for four months, from October through January. Now the pollock come in for about 6 to 8 weeks. I honestly believe that this pollock stock is significantly depleted. All fisherman for the last 70 years caught huge large pollock off the coast of Southern Maine during the spawning season. We also caught the pollock year-round off the coast of Maine, but we caught way more from October to January.

There seem to be a lot of confusion on the redfish review report on what size pollock had viable, ripe eggs and which once we're too young to ripe viable eggs.
I think it's important to know if a 19 inch pollock is a good spawner or if the 28+ pollock are the super spawners.

Eggs:

15 inch pollock: this fish is likely immature if it's caught it's a total loss to the future of the stock because it hasn't spawned once.

19 inch pollock: is contributing to the spawning stock biomass. It is a 1 for 1 producer.
It is likely spawning for the first or second time, she may produce roughly 250,000 to 400,000 eggs

30 inch pollock: has significantly more body cavity space, a 30 inch female can produce over 2 million eggs. The 30 inch fish is a 6 to 1 producer.

Oil Globule: quality over quantity:

The 19 inch pollock has smaller eggs and smaller oil globules, her larvae hatch with a "small lunchbox". If they don't find food almost immediately in the open ocean, they starve

The 30 inch pollock is physically larger and packed with much more superior oil globules and an extended spawning window. They spawn in multiple batches over a long period. Her larvae hatch with a huge backpack of food. The larvae from a 30 inch Pollock can survive days longer without finding food than larvae from a 19 inch fish. In a year where the plankton bloom is late or the water is cold only the offspring of the 30" fish will survive.

Spawning experience and duration:

19 inch fish: have a short, "one shot" spawning window. If a storm hits during that week, their entire reproductive effort for the year is wiped out.

30 inch fish are batch spawners with massive energy reserves. They can release eggs in waves over a much longer period (sometimes up to a month). They "bet" on different weather windows, ensuring that at least some of their millions of eggs find a calm ocean.

Large females don't just produce more eggs. They produce higher quality eggs with larger oil globules. They give their larvae a better chance of survival.

National Standard 1. says: 'we must allow fish to reach their most productive life stage. Current landings show a drop from 34% to 5% for large pollock, proving that we are harvesting the juveniles at such a small size and preventing them from ever reaching maturity. Without gear verification of what size mesh fishermen are using, we are simply presiding over the slow motion depletion of the resource.

Commercial fishermen in Maine traditionally used one boat, and change the gear throughout the seasons, in prefer to catch a variety of species throughout the year.

In 2010, the fisheries went to an allocation system and a lot of the gillnetters didn't get a great allocation because they diversified over different species throughout the year. They didn't catch all of the same species year-round. After 2012, gillnetters didn't have alot of allocation for the cod and the hake, so they had to pay a high lease cost for those two species. Pollock was our best stock in Maine. As the size of the pollock got smaller and smaller because of the small mesh being used in the redfish program, the pollock weren't coming into spawn, and the year round pollock have disappeared. There were 94 gillnet vessels in 2009 and now there are 18. The gillnetters have lost 81% of the fleet.

We had to buy a trawl vessel in order to still be able to catch ground fish. The trawl vessel was $325,000 but we still have to maintain our 38 foot boat so we could catch lobsters in the winter months, and menhaden in early summer.
The gillnetter haven't left, a lot of them are lobstering year round. If the pollock, cod and hake make a come back, they could go back gillnetting. Lobster is the main species we have left that people can catch a lot of. I think ground fisherman didn't want, or couldn't afford to buy a second boat, especially if the boat is more than a $300,000.

For 70 years, fisherman in Maine landed a lot of pollock.
The historical data that's on the Main DMR website shows from 2000-2009 that we landed around 4,000,000 pounds a year with the value of 2,000,000.00 per year
From 2014 to the present, the amount of pollock landed went down every year. Last year, fisherman landed 251,000 thousand pounds with a value of 414,367 dollars.
You can see that in the last 10 years our fishing communities lost 3,500,000 pounds of pollock per year. The price of pollock right now, is around $1.50 a pound. So that 3,500,000 pounds of pollock would be worth $5,250,000 per year.

I believe that several of the National Standards of the MSA have been violated because we can't make a living with a gillnets anymore.

National Standard 8: Adverse economic impact
National Standard 8. the failure of sustained participation

By creating the red fish exemption that only one gear type can access, the council failed to provide for the sustained participation of the Maine gillnet community. proves that the management measures were not practical for the existing fleet.
It forced a choice between buying a second boat, which would've been a trawler or exiting the ground fish fishery.

National Standard 4: lack of equity
This standard requires that allocations of fishing privileges, be fair and equitable
By giving trawlers a specific pathway, to use smaller mesh than the gillnetters are allowed to use, the red fish program has remained profitable. While gillnetters struggle with a severely diminished pollock stock and high lease costs for cod and hake, the council created an in equitable distribution of opportunity. You are essentially penalizing the one-boat diversified model that Mainers naturally use.

National Standard 6: variations and contingencies
This Standard states that management should take into account the variations and contingencies of fisheries, fishery resources, and catches. The Maine gillnet fleet was built on variability, switching from groundfish to lobster, shrimp or menhaden. The 2010 allocation and the trawler only

redfish program ignored this contingency and tried to force a diverse fleet into a one-size-fits-all gear mandate, which led to the 81% exit rate of the gillnet fleet.

By creating exemptions like the redfish program that are exclusive to trawl vessels, you have failed the fair and equitable test of National Standard 4. You have ignored the diverse one boat reality of the Maine fisherman. We are not just asking for a change in mesh size, we are asking for the council to fulfill it's legal mandate to protect the survival of our fishing communities.

I don't believe the goals and objectives for the redfish exemption are being met. Objective #2 is certainly not being met -" increase the harvest of redfish while reducing to the extent practicable bycatch of other groundfish stocks". That is absolutely not happening, an 'expert fisherman' at the redfish review meeting said they were catching redfish during the day and and catching the pollock when they drop down at night, that is a targeted fishery with a 5.5" mesh or less.

Fisherman don't use a 'ground fish net' to catch dabs and greysole . They use a 'flounder net'. A flounder net has a smaller roller frame and the net, when deployed, is 10 to 15 feet tall. A ground fish net, on the other hand, has a huge heavy roller frame and it's 30 feet tall.

Part A and Part B of the trip for the flounders, has exactly the same length frequencies for these two species. This means captains are using the same mesh size for Part A and Part B. The redfish vessels are targeting flounders inside and outside of the exemption area. That's not 'reducing bycatch to the extent practicable'. I think a vessel on a redfish exemption trip, should not be deploying a flounder net, to specifically catch greysole and dabs.

In conclusion,
I have read, and re-read all of the Special Redfish Exemption Program rules and regulations, over and over to try and figure it out. I think this is the most convoluted, complicated regulation, I have ever read,

Thank you for allowing me this written comment,
Sincerely,
Lucinda Nieuwkerk,
Co-partner of a commercial fishing, owner operator business

From: Andrea Incollingo <ai454@msn.com>
Sent: Thursday, April 9, 2026 1:13 PM
To: comments <comments@nefmc.org>
Subject: Upcoming GRA in Southern New England

To: NEFMC Chairperson

Dear Dan,

I am writing on behalf of the fishing vessels who supply me with my main bait product, little skate. My name is Andrea Incollingo. I own The Bait Company in Pt. Judith, Rhode Island supplying local lobstermen with their bait needs. I have been doing this for the last 40 years. I am an on the Advisory Panel to the Skate Committee for the Northeast Skate Complex. I was recently informed by my fishermen of a rule to restrict dragging in the very area where 90% of the little skate bait are harvested during the bulk of the lobstering season (May through December). It seems that unless very specific gear is used, the area is closed to traditional otter trawling. I am told that utilization of this specific gear is not conducive to catching skates, virtually eliminating the ability of them to meet my market demands. As you must understand, the lobstermen are now very concerned about the availability of bait as they prepare for this season. More and more area has been lost to the skate harvesters with the installation of the wind farms. This added restrictive measure will be crippling to both the dragging and lobstering businesses here in Point Judith. (Not to mention my business!)

At the last couple of Skate Meetings, the potential of this action was never mentioned. Our focus has been on other priorities that have less dire consequences to the survival of our fishery. I understand that the analysis has just been completed that triggered an Accountability Measure in respect to the condition of the window pane (brill) flounder. I cannot emphasize enough how devastating this action may prove to be as well as just how beneficial it will be for the brill. There was a similar action some years ago, but I think the restricted area was much smaller.

With so much ground already off limits to these draggers, losing more at this time is devastating. I am hoping there is something that can be done through an Emergency Action to postpone this multi business destruction. We have just

come through a very hard winter and as the weather improves, the hopes for a successful season are taking a crushing blow with this pending action.

Due to the timeframe this requires your immediate attention. I am hoping this can be addressed in the upcoming Council meeting.

Thank you and please advise as to anything you may need to facilitate this discussion.

Andrea Incollingo
The Bait Company
401-742-9728