



April 4, 2016

John K. Bullard
Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Re: Comments on the Proposed Rule for Groundfish Framework Adjustment 55

Dear John,

The Northeast Seafood Coalition (NSC) offers the following comments for the proposed rule published for Framework Adjustment (FW) 55 to the Northeast Fishery Management Plan.

2016 Fishing Year U.S. / Canada Quotas:

General Discussion:

- Last year members within the scientific and management community raised concern in regards to the low utility of GB yellowtail by the commercial groundfish fleet. Although the U.S. / CA agreement is reliant upon updated trawl survey indices from both the U.S. and Canada trawl surveys, some expressed concern that the low utility by the fleet confirmed low stock abundance as seen in the trawl survey datasets. In an NSC letter to the SSC on August 28, 2015 (see attached), NSC provided a fishery viewpoint on ACLs and the extreme decline in fishing effort that has led to a loss of the U.S. market.

Catch Limits for the 2016-2018 Fishing Years:

Correction:

The description in the proposed rule does not correctly reference the Council's motion and intent for the reconsideration of the ABC for witch flounder. Specifically, the Council requested on December 3, 2016, which was approved in a Council motion, "the SSC develop an additional alternative for the 2016 ABC for witch flounder without being constrained by 75% Fmsy. The Council will accept the temporary risk level associated with an ABC up to the OFL for FY 2016." Subsequent to this motion, the Plan Development Team updated 2015 catch estimates which slightly increased the 2016 OFL of witch flounder to 521 mt and the 75% Fmsy to 399 mt.

Comment:

NSC appreciates the Council's willingness to accept a 2016 ABC for witch flounder which is not constrained by 75% Fmsy, closer to the OFL of 521 mt. Although NSC supported the SSC's

recommendation of an ABC of 500 mt, NSC does support the ABC of 460 mt for witch flounder as endorsed by the Council and now proposed under Framework 55.

NSC expressed concern with the reported status of witch flounder during the public process. In the NSC letter to the SSC dated January 16, 2016 (see attached), NSC conveyed the strong fishery wide dependence on witch flounder, a unit stock, and expressed concern that catch rates within the fishery are completely inconsistent with the reported stock status from the assessment. Additionally, in the absence of correlating negative signals from the commercial fishery, the 2015 Operational Update still incorporated a substantial (downward) retrospective adjustment that lowered the biomass estimates resulting from the model by approximately 50%. This significant adjustment combined with the fact that projections for the range of catches from 399 to 521 mt provided by the Plan Development Team produced differences in corresponding biomass that were *biologically insignificant* present compelling support for the Council's decision to adopt an ABC of 460 mt. *NSC notes witch flounder will still be a -45% change from 2015.*

NSC supports the assessment panel's decision to reject the GB cod model for use to inform catch advice. Several model performance indicators suggested that problems in the 2012 benchmark assessment are worse in the 2015 assessment update. There was a strong retrospective pattern in the benchmark assessment that worsened considerably in this assessment update. NSC recognizes that GB cod will be prioritized for a benchmark in the near future and looks forward to participating on behalf of our membership in that process.

NSC views the strong retrospective pattern that appeared in the SNE / MA yellowtail assessment as clear grounds to reject the model for use to inform catch advice. The simple fact that a retrospective adjustment, if applied, would have resulted in model failure should have provided enough evidence to reject the model. Furthermore, the fact that the reported status for SNE / MA yellowtail is a complete departure from the previous assessment held only a few years ago and model runs shown required an illogical acceptance that catch in one year could equate to the total biomass in a subsequent year provide further justification.

Notwithstanding NSC's serious reservation concerning this assessment, NSC does support the SSC's effort to provide an alternative approach to setting catch advice. NSC supports the recommended catch for SNE / MA yellowtail based on the SSC's recommendation. NSC views this as a placeholder and strongly endorses a more thorough scientific examination that evaluates the datasets, model formulation and source of the strong retrospective error.

General Discussion:

NSC has been an active participant over the years in the scientific assessments for groundfish stocks. Direct engagement in the process, however, has made NSC leadership grow more leery of groundfish assessments.

The catch limits now proposed under FW 55 are based upon the results of the 2015 Operational Assessment Update completed for all groundfish stocks this past fall. The results of

this operational assessment have yet again resulted in significant swings in reported stock conditions.

Most notably is the swing that has occurred for SNE/ MA yellowtail and GB winter flounder with respective reductions of 62% and 67% from 2015 to 2016 fishing years. The percentage change from 2015 to 2016 for other stocks is also devastating: GB cod -62%, SNE/MA winter flounder -53%, witch flounder -41% and CC/GOM yellowtail -22%. Another stock, American plaice will have a 16% reduction in the ACL at a time when the fishery continues to see historical abundance and availability. With the fleet operating at historical low effort levels both in numbers of participating vessels and total days at sea, the ACE available to the fishery still poses a serious constraint on the fishery. There appears to be a pattern of declining ACLs correlating to increasing abundance which has the fishery and their representatives confounded and discouraged.

Those that have remained fishing for groundfish and trying to survive the steep ACLs reductions that started in 2012, are experiencing a much healthier multi-species complex with higher levels of abundance than is being reported by the assessments. Throughout the region, fishermen spend more time avoiding groundfish due to the low ACLs than catching groundfish. This is a profound and historic predicament for this fishery. NSC finds it alarming that the conflicts that exist between the reported status generated by stock assessments and fishery catchability is not being adequately addressed nor is it being taken as seriously as it merits.

NSC offers these additional general comments following the latest 2015 Operational Update:

- NSC has continuously expressed our concern over the stock assessment process that is being used for management decision making. The Operational Assessment Update in 2015 may have included updated catch information for quantifying and aging the removals, but the estimates on stock size from which the catch is removed continues to rely on the trawl survey index as the primary driver of determining stock size within the models. The operational assessment process, which is referred to as a “turning of the crank” by some, has to date, resulted in drastic swings in reported abundance estimates for many groundfish stocks. Until other datasets or methods are used to either ground-truth estimates of stock size external to the models or additional datasets are used within the models where currently only the trawl survey datasets are used, there will continue to be instability and unpredictability in the management regime. This volatility and unpredictability, chasing noise, will continue to negatively impact commercial groundfish fishing vessels and their respective communities.
- On April 20, 2015, NSC organized and submitted to members of Congress a petition of no confidence in the stock status reported by recent assessments for many groundfish stocks (see attached). While the concern was largely based on the reported status of Gulf of Maine cod, the petition reflected the growing sentiment among groundfish fishermen across the region that the reported status does not remotely match what fishermen are seeing on the water.

Make no mistake, we believe this problem is systemic and the magnitude of the problem cannot be overstated. Simply improving the survey at this juncture will not rectify the precarious position we've allowed the groundfish industry to exist in today. Stock sizes on several critical stocks are so grossly underestimated that the existing assessment methods that rely upon survey trends cannot recover to "stock size reality" in time to preserve a viable commercial fishery. NSC strongly recommends a sincere recognition of this reality from the Northeast Fishery Science Center (NEFSC) be conveyed and a course of action that includes an urgent effort to develop and implement independent means of reestablishing current stock size estimates to reset the baseline stock sizes from which future assessments will adjust going forward.

Examples of methods to reset stock size baselines are Swept Area Biomass Surveys both traditional and video, creating a retrospective commercial CPUE index using existing datasets and conducting extensive simulations of the assessment models using broad variables for alternative survey index values for consecutive years starting when the Bigelow was put online. The reason for the latter is that there appears to be a progressive decline that gains momentum and scale of impact on the terminal year biomass estimate within the models caused by a period of consecutive and "poor" survey indices. The time series is considered continuous but the reality is that significant changes have occurred which required calibrations of exponential magnitudes. The most notable being the transition from Albatross to Bigelow and the changes to the survey gear. NSC fears that calibration coefficients that are exponential in values have the potential to create significant and potentially unrecoverable management conditions if proven to have not been correct.

- NSC has been an advocate for exploring alternative methods for setting catch advice within the management process in order to offer fishery managers a tool that can smooth management responses from the noise (both highs and lows) inherent in the trawl survey data. Although the Council has begun to explore potential methods through a contract, there has been a growing practice with the technical team to recommend constant quotas for stocks, quotas that are held low for multiple fishing years in a row. Constant quotas have typically been recommended when assessments have been poor and projection models have been overly optimistic on predicting biomass growth. The technical team has expressed their lack of faith in the projection / stock recruitment estimates used in rebuilding plans therefore constant quotas are recommended under the premise that a correlation between keeping quotas low will force growth. This approach is often recommended regardless of the increases in the allowable catch offered by the projection model estimates.

NSC has voiced our serious concern over this type of use of a constant quota approach with managers and the scientific teams. Since mechanisms already exist and are used within the assessment process to account for uncertainty, notably to apply retrospective adjustments to data sets that in some instances have greatly reduced the perceived biomass for stocks, applying additional layers of precaution under a constant quota approach is not only non-biological but takes precaution to an extreme. Furthermore,

since many of the allowable catches for groundfish stocks have been driven down to historical lows, every additional metric ton allocated to the fishery will enable the groundfish fishery, or non-groundfish fisheries, to operate. Essentially, every metric ton allocated to the fishery will assist the fishery to achieve optimum yield on other stocks. Also, the biological benefits of applying a constant quota approach have been shown by the projection model runs to be inconsequential when compared to the potential long-term harm to the fishery when doing so.

- Following the results of the GARM III Assessment held in 2007 where retrospective patterns plagued some assessments, the NEFSC organized a working group in 2008 to examine retrospective patterns in stock assessments. Simulation analyses were used to account for sources of retrospective patterns, which include missing catch, errors in natural mortality rate calculations and a change in survey catchability. The workshop concluded in a report released in 2009 that contains recommendations, notably on grounds for which an assessment should be rejected for management advice when a strong retrospective pattern exists.¹

The latest 2015 Operational Update Assessment revealed that many groundfish assessments continue to be plagued by strong retrospective patterns. Regardless of the data adjustments that have occurred over the years, the pattern has appeared to worsen for a host of groundfish assessments. Although NSC agrees with the decision to reject the GB cod assessment, NSC questions the decision not to reject other assessments

NSC is gravely concerned that the source of the retrospective remains largely unidentified. Adjustments that have been applied appear to be done to improve the data fit with a model but not solve an underlying problem. In the case with the witch flounder assessment, the most recent adjustment applied may result in a better performing model but NSC would argue it definitely does not offer a more accurate view of the actual biomass.

Groundfish At Sea Monitoring Program Adjustments:

Comment:

NSC continues to oppose the concept of industry funded ASM. However, the issue of who is funding the program is independent of the collective responsibility to improve the program, seek efficiencies, and take advantage of the incremental benefits of additional years of data and knowledge gained since the inception of the program.

With this in mind, NSC fully supports the full suite of measures proposed under FW 55 to adjust the ASM program and advises the Agency to approve the full package of measures as endorsed by the Council. NSC appreciates and concurs with the description and rationale

¹ Legault, C. *Report of the Retrospective Working Group, January 14-16, 2008*, Northeast Fisheries Science Center Reference Document 09-01, January 2009.

provided for each of the proposed adjustments contained under the proposed rule. The language provides an exceptional explanation concerning the background of the existing program as well as the rationale behind the ASM adjustments proposed.

NSC notably supports the measures recommended to evolve the target coverage rate methodologies used to achieve the 30 percent coefficient of variance (CV) requirement. Utilizing multiple years of data now available through the ASM program increases the statistical strength and lessens the volatility in inter-annual changes in coverage rates generated by the existing methodology that is based solely on a single fishing year data set. Using multiple years of data also lessens the inefficiency inherent in the existing methodology which, as proven by Agency reports, has led to target coverage levels that have far exceeded the level necessary to meet the 30% CV standard for the vast majority of groundfish stocks.

Furthermore, NSC supports the removal of the administrative standard of monitoring 80 percent of discard pounds at the 30 percent CV or better, the full list of standards proposed to filter the 30% CV requirement and the clarification offered concerning the goals and objectives of the ASM program. NSC also supports the exemption for ASM coverage requirement for the extra-large gillnet trips where data has proven minimal to no groundfish bycatch has been encountered. However, NSC continues to support this provision so long as the Agency removes these trips when calculating the overall coverage rate requirements. This exemption should not inadvertently increase the coverage rate requirements for other groundfish trips.

NSC members already face an extraordinary level of inter-annual uncertainty that results in business instability. Huge changes in ACLs coupled with other uncontrollable and unpredictable variables have caused a situation where many have either left or are on the verge of leaving the fishery. Using multiple years of data combined with the suite of other adjustments proposed in this action to determine ASM coverage rates will lessen the volatility in the inter-annual coverage rates in a more efficient and statistically robust manner. If left unadjusted, the current methodology will continue to result in large swings in coverage rates which would be difficult if not impossible for NSC fishing members and their respective NEF Sectors to develop business plans.

General Discussion:

- NSC is gravely concerned with the current process being followed to determine the Northeast Fishery Observer Program (NEFOP) coverage to be targeted in a given fishing year for the groundfish fishery. As of April 4, 2016, the Agency has still not notified the industry on the level of NEFOP coverage that the Agency will provide to the overall coverage rate requirements. The Agency is, reportedly, continuing to determine monitoring requirements (SBRM) for all fisheries and the approximate level of federal funding available to do so. In the case of the northeast groundfish fishery, where the Agency has transitioned to industry funding requirements, the burden of monitoring coverage according to the Agency's budget ultimately falls upon the shoulders of the fishery, which is now only weeks away from operating.

Distribution of Eastern / Western GB Cod Sector Allocations:

Comment:

- NSC supports the proposed measure to allow sectors to convert their eastern GB cod allocation into western GB cod allocation. The GB cod stock was divided into separate management units (east / west) to accommodate the U.S. / Canada Sharing Agreement. The distinction between east and west is not for scientific or biological purposes. This measure is conservation neutral and provides necessary flexibility to individual fishing businesses without compromising our US responsibility to comply with the transboundary management agreement.

Sector Measures for the 2016 Fishing Year:

Comment:

- NSC supports the proposed operation plan submitted for Northeast Fishery Sector 12 for fishing year 2016.

Thank you for the opportunity to comment on these important measures for the commercial groundfish fishery.

Sincerely,



Jacqueline Odell
Executive Director

ATTACHMENTS



January 15, 2016

Dr. Jacob Kritzer, Chair
New England Fishery Management Council
Scientific and Statistical Committee
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Dr. Kritzer,

We are writing to offer the Scientific and Statistical Committee (SSC) a groundfish fishery perspective on the availability and utilization of witch flounder based upon our experience with Northeast Seafood Coalition (NSC) fishing members that operate out of the Northeast Fishery Sectors.

NSC members enrolled in the Northeast Fishery Sectors include fishing vessels that fish inshore as well as vessels that have a broader range which operate offshore and in multiple broad stock areas (BSAs). In terms of the witch flounder fishery, NSC members participate in the two key components that comprise of this fishery, the inshore Gulf of Maine and offshore Gulf of Maine / Georges Bank.

For NSC members and non-members, CPUE has remained high in all areas where witch flounder is an expected component of catch. Put another way, from a historical perspective the witch flounder fishery footprint within the overall stock area has not constricted and CPUE at the fringes remains dangerously high relative to the recent commercial ACLs and resulting individual and fleet allocations.

For the offshore fleet this is especially problematic because the fleet is already avoiding the areas within the footprint that are producing highest CPUEs of witch flounder because the 2013-2015 ACLs have presented a witch flounder avoidance scenario for the mobile gear fleet in recent years. For the inshore fleet, witch flounder continues to be readily available and comprises an ever increasing proportion of total catch due to dramatically reduced catch reductions of other inshore stocks.

For most of the fishery, witch flounder shares a fishery footprint that is similar to other important groundfish stocks as well as monkfish. Notably, american plaice, white hake, pollock and monkfish share huge overlaps of their respective fishery footprints to the extent that the catch of any of these species can be directly constrained by the ACL of one of the others. The extent to which the fishery is constrained is largely a function of the ability of the assessment to come close to correctly estimating the true state of nature for a particular stock among the mix of stocks that co-exist.

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NSC has consistently stated that large ABC reductions that result from a truly smaller stock should not present an insurmountable fishery constraint. This is because the overall CPUE within the historical fishery footprint should decline proportionally to the reported stock status and fishermen should find it relatively easy to avoid any known concentrations.

Unfortunately, for many stocks in the groundfish complex this is not the case. Witch flounder is a prime example of a stock that suffers from a pessimistic assessment concurrent to completely contradictory signals in the fishery throughout the full footprint areas both inshore and offshore.

At the Groundfish Committee Meeting on Thursday January 14, 2016, catch projection results provided by the Plan Development Team shown to the Committee revealed an ABC of 521 metric tons in FY 2016 has a corresponding biomass of 3,234 metric tons. A constant quota approach using an ABC of 521 metric tons in FY 2017 would result in a corresponding biomass of 4,210 metric tons.

Alternatively, an ABC of 399 metric tons in FY 2016 has a corresponding biomass of 3,253 metric tons and a constant quota utilizing an ABC of 399 metric tons in FY 2017 results in a corresponding biomass of 4,342 metric tons.

NSC views the difference in these corresponding biomass values as insignificant and, thus, fully supports the Council's willingness to accept an ABC for witch flounder that is up to 521 metric tons.

To conclude, in this instance, there are far greater risks to the groundfish fishery than to the resource. With no correlating negative signals being generated by the commercial fishery the 2015 updated assessment included a substantial downward retrospective adjustment (approximately 50%). For this reason and recognizing there will be a benchmark assessment in 2016, NSC fully encourages the reconsideration of an ABC up to the OFL.

Sincerely,



Jackie Odell
Executive Director



Vito Giacalone
Policy Advisor, Board of Directors



August 28, 2015

Dr. Jacob Kritzer, Chair
New England Fishery Management Council
Scientific and Statistical Committee
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Dr. Kritzer,

We are writing to offer the Scientific and Statistical Committee (SSC) with a groundfish fishery perspective on the low utilization of Georges Bank (GB) yellowtail in recent years in preparation for the Scientific and Statistical Committee's (SSC) discussion relating to the ABC for GB yellowtail in 2016-2017.

Although we are not aware of any analysis conducted to date that has evaluated the change in effort over time with respect to directed GB yellowtail trips, we do know that the reduction in ACLs for GB yellowtail that began in the mid-2000s has greatly impacted the number of participants in the fishery. From speaking with our members from New Bedford, the offshore fleet that targeted GB yellowtail has been reduced by roughly 75% over the past 7 or 8 years. Vessels have either tied-up, been sold, or have switched to other fisheries. To put this into perspective we conducted a cursory review of a roster of vessels that once contributed substantially to the directed yellowtail fishery on Georges Bank. Of the 60 vessels recalled from no earlier than 2006, only 15 vessels remain in the fishery today. Those 15 vessels no longer fish for yellowtail for a combination of compelling reasons:

1. When the Major Change model first hit the GB yellowtail assessment, pressure to reduce the ACL below 2,000 metric ton effectively eliminated the directed fishery which resulted in permanent loss of market. The market for yellowtail flounder has now become so fragile that even low volumes can return very low ex-vessel price on the fresh spot market.
2. The continuous downward direction of ACL caused individual Potential Sector Contributions (PSC) that were relatively high for historical GB yellowtail vessels, to result in very low Annual Catch Entitlements (ACE).
3. This caused a mass exodus from the fishery and left the permit holders with no other option than to lease their allocations through the sector system.
4. For the few remaining vessels who continued to be active they are faced with speculating on trying to lease GB yellowtail quota from multiple inactive fishermen in order to compile enough yellowtail for one directed trip. Many of the potential lessor permit holders are trying to move their allocations in packages which makes collecting GB yellowtail quota even more onerous financially.
5. Once individual allocations (via sector internal distribution) dropped below the threshold that

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justifies directed fishing, the costs of leasing coupled with the loss of a reliable market price has the same effect as a fishery closure.

Again, from our cursory review, the 15 vessels that are still active from the 60 vessels we identified are only active because they were able refocus their fishing businesses onto haddock and deeper water fisheries of sole, dabs, monkfish or redfish.

Yellowtail, like many of our NE groundfish species, are spatially discreet in that their preferred habitat is a small percentage of the biological range of the stock.

For stocks like GB yellowtail flounder, there is a threshold where utility rates would increase once the ACL was increase to or above the level that would make it financially feasible to try to rebuild the market for yellowtail which will only happen once a regular supply reoccurred.

The PDT correctly noted that a substantial portion of the GB yellowtail historical fishery areas are restricted by the Northern windowpane flounder accountability measure (AM) which prohibits the use of flounder nets.

The windowpane AM requiring the exclusive use of the separator trawl coupled with the fact that the haddock fishery on Georges Bank has been occurring primarily on the western edge of the bank rather than the Southeast Parts, the groundfish fleet interaction with the GB yellowtail stock is extremely limited.

The important message we are trying to convey here is that utility rates in cases such as GB yellowtail are a very poor indicator of stock size for stocks that are spatially and temporally discreet and predictable.

We would therefore advise the SSC not to view recent catches from the commercial groundfish fleet as confirmation for low biomass and would urge the SSC to at a minimum retain status quo when considering the ABC for this stock. It is our hope that targeted research coupled with direct initiatives undertaken by the groundfish fishery in the near future can work to improve the biological knowledge and thus assessment for the GB yellowtail stock.

Sincerely,

Jackie Odell
Executive Director

Vito Giacalone
Policy Advisor, Board of Directors

April 21, 2015

The Honorable Susan Collins
United States Senator

The Honorable Angus S. King, Jr.
United States Senator

The Honorable Jeanne Shaheen
United States Senator

The Honorable Kelly Ayotte
United States Senator

The Honorable Elizabeth Warren
United States Senator

The Honorable Edward J. Markey
United States Senator

The Honorable Jack Reed
United States Senator

The Honorable Sheldon Whitehouse
United States Senator

The Honorable Richard Blumenthal
United States Senator

The Honorable Christopher Murphy
United States Senator

The Honorable Charles E. Schumer
United States Senator

The Honorable Kirsten E. Gillibrand
United States Senator

The Honorable Robert Menendez
United States Senator

The Honorable Cory A. Booker
United States Senator

Dear Senators:

The undersigned express, through this petition, no confidence in the stock status reported by recent assessments for many groundfish stocks. While these concerns are with respect to the recent Gulf of Maine cod report and management actions that have flowed from it, many of these same concerns apply to other groundfish stocks throughout the northeast region.

We are conveying our no confidence because the latest assessment and reported status of Gulf of Maine cod **does not remotely** match what fishermen (we) have seen on the water over the past year. Specifically fishermen (we) have seen multiple concentrations of cod appearing simultaneously across the Gulf of Maine, specifically those that are open to both commercial and recreational fishing. These concentrations indicate numerous age classes and recruitment events.

Although this petition of no confidence is primarily about Gulf of Maine cod, other stocks throughout the northeast region (Gulf of Maine, Georges Bank and Southern New England) are showing similar results of abundance and strength in year classes that are not being reported by most recent assessments. Those species include, but are not limited to Georges Bank cod, Gulf of Maine haddock, yellowtail, witch flounder, American plaice, red hake, thorny skate, wolfish and windowpane flounders.

For these reasons we strongly support the following action:

The formation of a blue ribbon panel of assessment scientists, which includes government and academic and industry leaders to be coordinated by either the National Research Council (NRC) or the United States Government Accountability Office (GAO), to determine the underlying causes of assessment failures. Based on these findings, provide binding recommendations to correct those causes in a transparent and collaborative manner and in time for the updated review scheduled for all groundfish stocks this coming September.

Michael Walsh	F/V Atlantic Prince, F/V Guardian	Boston, MA
Tory Bramante	F/V American Pride, F/V America	Boston, MA
James Hayward	F/V Heidi & Elisabeth	Eliot, ME
Carl Bouchard	F/V Stormy Weather	Exeter, NH
Albert Cottone	F/V Sabrina Maria	Gloucester, MA
Vincenzo Taormina	F/V Miss Sandy	Gloucester, MA
Sebastian Brancaleone	F/V Tina & Tom	Gloucester, MA
Joseph Jurek	F/V Mystique Lady	Gloucester, MA
Giusseppe Randazzo	F/V Razzo	Gloucester, MA
Daniel Murphy	F/V Bantry Bay	Gloucester, MA
Joseph Orlando	F/V Santo Paulo	Gloucester, MA
Clark and Susan Sandler	F/V Sea Farmer II	Gloucester, MA
Russell and Christine Sherman	F/V Lady Jane	Gloucester, MA
Richard Beal	F/V Explorer IV	Gloucester, MA
Sam Novello	F/V Capt. Novello	Gloucester, MA
Mark Novello	F/V Capt. Novello	Gloucester, MA
Francesco Paul Vitale	F/V Angela Rose	Gloucester, MA
Frank Sciortino	F/V Christina Eleni	Gloucester, MA
Vincenzo Russo	F/V Miss Trish II	Gloucester, MA
Sebastian and Stefanie Noto	F/V Grace Marie	Gloucester, MA
Giuseppe Dimaio	F/V Capt. Joe, F/V Tyler, F/V Orion	Gloucester, MA
Thomas T. Testaverde	F/V Midnight Sun	Gloucester, MA
Thomas J. Testaverde	F/V Midnight Sun	Gloucester, MA
Ignazio Sanfilippo	F/V Cat Eyes	Gloucester, MA
Accurssio Sanfilippo	F/V Lilly Jean	Gloucester, MA
Accurssio Sanfilippo	F/V Captain Dominic	Gloucester, MA
Joseph Sanfilippo	F/V Maria GS	Gloucester, MA
Salvatore Sanfilippo	F/V Jenaya & Joseph	Gloucester, MA
David Williams	F/V Kathryn W	Gloucester, MA
John Deltorchio	F/V Amber and John	Gloucester, MA
John Montgomery	F/V Chandelle	Gloucester, MA
Bill Skrobacz	F/V Toots	Gloucester, MA

Pete Mondello	F/V Allison Carol	Gloucester, MA
Tom Lupo	F/V Jennie C	Gloucester, MA
Jim Santapaola	F/V Amanda Leigh, F/V Amanda & Andy II, F/V Amanda & Andy III	Gloucester, MA
Doug Germain	F/V Labor in Vain	Gloucester, MA
Mark Byard	F/V SS Mellon 3	Gloucester, MA
Bonnie Akerley	F/V Explorer II	Gloucester, MA
Randall Morgan	F/V Miss Dolores	Greenbackville, VA
Richard Syphers	F/V Ashleigh	Hampton, NH
Dean Holt	F/V Katie May	Hampton, NH
David Goethel	F/V Ellen & Diane	Hampton, NH
Peter Lagerstrom	F/V Miss Maura	Hampton, NH
Troy Dwyer	F/V Langley Douglas	Hampton, VA
Ed Smith	F/V Special K, F/V Claudia Marie	Manchester, MA
Richard Burgess	F/V Lori B, F/V Ryan Zackery	Manchester, MA
Vincent Carrilo	F/V Kahuna	Montauk, NY
Mark Phillips	F/V Illusion	Montauk, NY
Dan Farnham	F/V Megan Marie	Montauk, NY
Kevin Maquire	F/V Evening Prayer	Montauk, NY
Willis Blount	F/V Ruthie B	Nantucket, MA
William P. McCann	F/V Shamrock, F/V Pilgrim	New Bedford, MA
Todd Bragdon	F/V Resilient	New Bedford, MA
Jack Morris	F/V Brittany Eryn	New Bedford, MA
Standley Adamczewski	F/V Humbak	New Bedford, MA
Antonia Cravo	F/V United States	New Bedford, MA
Armando Silva	F/V Iberia II	New Bedford, MA
Tomas Vinegra	F/V Hustler	New Bedford, MA
Pedro Cura	F/V Fisherman	New Bedford, MA
Antonio JR Borges	F/V Sao Paulo	New Bedford, MA
Antonio Sao Marcos	F/V Sao Marcos II	New Bedford, MA
David Stanley	F/V Seven Seas	New Bedford, MA
Carlos Alberto	F/V CSM	New Bedford, MA
Michael Matuliatis	F/V Rose Marie	New Bedford, MA
Alex Smith	F/V Buzzards Bay	New Bedford, MA
David Stanley	F/V Kathy & Jackie	New Bedford, MA
Antonio Fernandes	F/V Vila Nova do Corvo I	New Bedford, MA
Cesar Verde	F/V Ilha do Corvo	New Bedford, MA
Brian Janelle	F/V Athena	New Bedford, MA
Saverio Viola	F/V Hera II	New Bedford, MA
Joao Abrev	F/V Southern Crusader II	New Bedford, MA
Roferio Paulino	F/V My Way	New Bedford, MA
Manuel Magalhaes	F/V Hera	New Bedford, MA

Jose Janardo	F/V Sasha Lee	New Bedford, MA
John Oliveira	F/V Triunfo	New Bedford, MA
Luis Fidalgo	F/V Destiny	New Bedford, MA
Antonio Pereira	F/V Poseidon	New Bedford, MA
Jose Dos Santos	F/V Olivia & Rafaela	New Bedford, MA
Domingos Goncalves	F/V Cowboy	New Bedford, MA
Thomas Simpson	F/V Bull Dog	New Bedford, MA
Shawn Machic	F/V Apollo	New Bedford, MA
Amilcar Esteves	F/V Green Acres	New Bedford, MA
Virgio Martins	F/V Hercules	New Bedford, MA
Antonio Rico	F/V Luso American I	New Bedford, MA
Carlos Alberto	F/V Luso American I	New Bedford, MA
Alan Sherman	F/V Resolute	New Bedford, MA
Arlindo Casteira	F/V Sao Jacinto	New Bedford, MA
Antonio Pacheco	F/V Predator	New Bedford, MA
Antonio Oliveira	F/V Sandra	New Bedford, MA
Virginia Martins	F/V Can-Do	New Bedford, MA
Francosco Garcia	F/V Casa Blanca	New Bedford, MA
Dan Connors	F/V Early Times	Newburyport, MA
Mike Doyle	F/V Seafarer, F/V Charlies Pride	Point Judith, RI
Tim Hauser	F/V Shelby Ann	Point Judith, RI
Donald Fox	F/V Determination, F/V Stephanie & Bryan, F/V Excalibur, F/V Lightning Bay, F/V Rebecca Mary, F/V Tenacity	Point Judith, RI
Patrick Knapp	F/V Connoe & Michael	Point Judith, RI
Troy Sawyer	F/V Debbie Sue	Point Judith, RI
Steve Roebuck	F/V Margaret Holly	Point Judith, RI
James Haitz	F/V James & Matthew	Point Judith, RI
Tony Faciano	F/V Shelby Ann	Point Judith, RI
Steve Follett	F/V Heather Lynn	Point Judith, RI
Cathy Harvey	F/V Ryan & Dillon	Point Judith, RI
Michael Gallagher	F/V Determination	Point Judith, RI
Joe Alvernes	F/V Yankee Pride	Point Judith, RI
Timothy Carrell	Seaside Fuel Inc.	Point Judith, RI
Dave Gallup	Rhode Island Engine Co.	Point Judith, RI
Thomas Williams	F/V Heritage, F/V Tradition	Point Judith, RI
Donald Roebuck	F/V Margaret Holley, F/V Debbie Sue	Point Judith, RI
Christopher Roebuck	F/V Yankee Pride, F/V Karen Elizabeth	Point Judith, RI
Brent Loftes	F/V Asher & Arianna	Point Judith, RI

Robert Cabral	F/V Provider	Point Judith, RI
Einar Barlow	F/V Lena Pearl	Point Judith, RI
Brian loftes	F/V Evan Christine	Point Judith, RI
John Ainsworth	F/V Hope & Sydney	Point Judith, RI
Stephan Arnold	F/V Elizabeth & Katherine	Point Judith, RI
Dennis Robilard	F/V Julie Ann II	Portsmouth, NH
Peter A. Flanigan	F/V Wendy Lee	Portsmouth, NH
Mike and Whitney Waltron	F/V Wendy Lee	Portsmouth, NH
Geordie King	F/V Brittany Lynn	Portsmouth, NH
Erik Anderson	F/V Scruffy	Portsmouth, NH
Jay Vanderpool	F/V Alyssa & Andrew	Rockport, MA
Jeff Tutine	F/V Lucky Strike	Rockport, MA
Paul Theriault	F/V Terminator	Rockport, MA
Dennis C O'Connell	F/V Lady Elaine	Rockport, MA
Jim Jones	F/V Wil-Mar	Rye, NH
Richard Anderson	F/V Bridget Leigh	Rye, NH
Jayson Driscoll	F/V Sweet Misery	Rye, NH
Jonathan Drake	F/V Paniolo	Rye, NH
Jean-Paul and Debra Metivier	F/V Debra Ann II	Salisbury, MA
Kevin Norton	F/V Yankee Rose	Scituate, MA
Dan Shannon	F/V Sorry Charlie	Scituate, MA
Kevin Shea	F/V Endeavor	Scituate, MA
Paul Unagst	F/V Destiny	Scituate, MA
Brainerd Ames	F/V Brenna Ashley	Scituate, MA
Frank Mirachi	F/V Barbara I Peters	Scituate, MA
Ronald Gustafson	F/V Cherylann	Scituate, MA
Charles Felch	F/V Lady Victoria	Seabrook, NH
Thomas Lyons	F/V Marion J	Seabrook, NH
Peter Bessette	F/V Miss Karyn	Stonington, CT
Phil Powell	F/V Foxy Lady	Swampscott, MA
Pete Fadden	F/V Catherine F	Swampscott, MA
William Borges	F/V Holly Jean	Westport, MA

April 21, 2015

The Honorable Chellie M. Pingree
U.S. House of Representatives

The Honorable Bruce L. Poliquin
U.S. House of Representatives

The Honorable Ann Kuster
U.S. House of Representatives

The Honorable Frank C. Guinta
U.S. House of Representatives

The Honorable Stephen F. Lynch
U.S. House of Representatives

The Honorable William Keating
U.S. House of Representatives

The Honorable James P. McGovern
U.S. House of Representatives

The Honorable Richard E. Neal
U.S. House of Representatives

The Honorable Michael E. Capuano
U.S. House of Representatives

The Honorable Niki Tsongas
U.S. House of Representatives

The Honorable Katherine Clark
U.S. House of Representatives

The Honorable Joseph P. Kennedy III
U.S. House of Representatives

The Honorable Seth Moulton
U.S. House of Representatives

The Honorable Tom MacArthur
U.S. House of Representatives

The Honorable Jim Langevin
U.S. House of Representatives

The Honorable David Cicilline
U.S. House of Representatives

The Honorable Joe Courtney
U.S. House of Representatives

The Honorable Lee Zeldin
U.S. House of Representatives

The Honorable Frank LoBiondo
U.S. House of Representatives

The Honorable Frank Pallone
U.S. House of Representatives

Dear Congressmen:

The undersigned express, through this petition, no confidence in the stock status reported by recent assessments for many groundfish stocks. While these concerns are with respect to the recent Gulf of Maine cod report and management actions that have flowed from it, many of these same concerns apply to other groundfish stocks throughout the northeast region.

We are conveying our no confidence because the latest assessment and reported status of Gulf of Maine cod **does not remotely** match what fishermen (we) have seen on the water over the past year. Specifically fishermen (we) have seen multiple concentrations of cod appearing simultaneously across the Gulf of Maine, specifically those that are open to both commercial

and recreational fishing. These concentrations indicate numerous age classes and recruitment events.

Although this petition of no confidence is primarily about Gulf of Maine cod, other stocks throughout the northeast region (Gulf of Maine, Georges Bank and Southern New England) are showing similar results of abundance and strength in year classes that are not being reported by most recent assessments. Those species include, but are not limited to Georges Bank cod, Gulf of Maine haddock, yellowtail, witch flounder, American plaice, red hake, thorny skate, wolfish and windowpane flounders.

For these reasons we strongly support the following action:

The formation of a blue ribbon panel of assessment scientists, which includes government and academic and industry leaders to be coordinated by either the National Research Council (NRC) or the United States Government Accountability Office (GAO), to determine the underlying causes of assessment failures. Based on these findings, provide binding recommendations to correct those causes in a transparent and collaborative manner and in time for the updated review scheduled for all groundfish stocks this coming September.

Michael Walsh	F/V Atlantic Prince, F/V Guardian	Boston, MA
Tory Bramante	F/V American Pride, F/V America	Boston, MA
James Hayward	F/V Heidi & Elisabeth	Eliot, ME
Carl Bouchard	F/V Stormy Weather	Exeter, NH
Albert Cottone	F/V Sabrina Maria	Gloucester, MA
Vincenzo Taormina	F/V Miss Sandy	Gloucester, MA
Sebastian Brancaleone	F/V Tina & Tom	Gloucester, MA
Joseph Jurek	F/V Mystique Lady	Gloucester, MA
Giusseppe Randazzo	F/V Razzo	Gloucester, MA
Daniel Murphy	F/V Bantry Bay	Gloucester, MA
Joseph Orlando	F/V Santo Paulo	Gloucester, MA
Clark and Susan Sandler	F/V Sea Farmer II	Gloucester, MA
Russell and Christine Sherman	F/V Lady Jane	Gloucester, MA
Richard Beal	F/V Explorer IV	Gloucester, MA
Sam Novello	F/V Capt. Novello	Gloucester, MA
Mark Novello	F/V Capt. Novello	Gloucester, MA
Francesco Paul Vitale	F/V Angela Rose	Gloucester, MA
Frank Sciortino	F/V Christina Eleni	Gloucester, MA
Vincenzo Russo	F/V Miss Trish II	Gloucester, MA
Sebastian and Stefanie Noto	F/V Grace Marie	Gloucester, MA
Giuseppe Dimaio	F/V Capt. Joe, F/V Tyler, F/V Orion	Gloucester, MA
Thomas T. Testaverde	F/V Midnight Sun	Gloucester, MA
Thomas J. Testaverde	F/V Midnight Sun	Gloucester, MA

Ignazio Sanfilippo	F/V Cat Eyes	Gloucester, MA
Accurssio Sanfilippo	F/V Lilly Jean	Gloucester, MA
Accurssio Sanfilippo	F/V Captain Dominic	Gloucester, MA
Joseph Sanfilippo	F/V Maria GS	Gloucester, MA
Salvatore Sanfilippo	F/V Jenaya & Joseph	Gloucester, MA
David Williams	F/V Kathryn W	Gloucester, MA
John Deltorchio	F/V Amber and John	Gloucester, MA
John Montgomery	F/V Chandelle	Gloucester, MA
Bill Skrobacz	F/V Toots	Gloucester, MA
Pete Mondello	F/V Allison Carol	Gloucester, MA
Tom Lupo	F/V Jennie C	Gloucester, MA
Jim Santapaola	F/V Amanda Leigh, F/V Amanda & Andy II, F/V Amanda & Andy III	Gloucester, MA
Doug Germain	F/V Labor in Vain	Gloucester, MA
Mark Byard	F/V SS Mellon 3	Gloucester, MA
Bonnie Akerley	F/V Explorer II	Gloucester, MA
Randall Morgan	F/V Miss Dolores	Greenbackville, VA
Richard Syphers	F/V Ashleigh	Hampton, NH
Dean Holt	F/V Katie May	Hampton, NH
David Goethel	F/V Ellen & Diane	Hampton, NH
Peter Lagerstrom	F/V Miss Maura	Hampton, NH
Troy Dwyer	F/V Langley Douglas	Hampton, VA
Ed Smith	F/V Special K, F/V Claudia Marie	Manchester, MA
Richard Burgess	F/V Lori B, F/V Ryan Zackery	Manchester, MA
Vincent Carrilo	F/V Kahuna	Montauk, NY
Mark Phillips	F/V Illusion	Montauk, NY
Dan Farnham	F/V Megan Marie	Montauk, NY
Kevin Maquire	F/V Evening Prayer	Montauk, NY
Willis Blount	F/V Ruthie B	Nantucket, MA
William P. McCann	F/V Shamrock, F/V Pilgrim	New Bedford, MA
Todd Bragdon	F/V Resilient	New Bedford, MA
Jack Morris	F/V Brittany Eryn	New Bedford, MA
Standley Adamczewski	F/V Humbak	New Bedford, MA
Antonia Cravo	F/V United States	New Bedford, MA
Armando Silva	F/V Iberia II	New Bedford, MA
Tomas Vinegra	F/V Hustler	New Bedford, MA
Pedro Cura	F/V Fisherman	New Bedford, MA
Antonio JR Borges	F/V Sao Paulo	New Bedford, MA
Antonio Sao Marcos	F/V Sao Marcos II	New Bedford, MA
David Stanley	F/V Seven Seas	New Bedford, MA
Carlos Alberto	F/V CSM	New Bedford, MA
Michael Matuliatis	F/V Rose Marie	New Bedford, MA

Alex Smith	F/V Buzzards Bay	New Bedford, MA
David Stanley	F/V Kathy & Jackie	New Bedford, MA
Antonio Fernandes	F/V Vila Nova do Corvo I	New Bedford, MA
Cesar Verde	F/V Ilha do Corvo	New Bedford, MA
Brian Janelle	F/V Athena	New Bedford, MA
Saverio Viola	F/V Hera II	New Bedford, MA
Joao Abrev	F/V Southern Crusader II	New Bedford, MA
Roferio Paulino	F/V My Way	New Bedford, MA
Manuel Magalhaes	F/V Hera	New Bedford, MA
Jose Janardo	F/V Sasha Lee	New Bedford, MA
John Oliveira	F/V Triunfo	New Bedford, MA
Luis Fidalgo	F/V Destiny	New Bedford, MA
Antonio Pereira	F/V Poseidon	New Bedford, MA
Jose Dos Santos	F/V Olivia & Rafaela	New Bedford, MA
Domingos Goncalves	F/V Cowboy	New Bedford, MA
Thomas Simpson	F/V Bull Dog	New Bedford, MA
Shawn Machic	F/V Apollo	New Bedford, MA
Amilcar Esteves	F/V Green Acres	New Bedford, MA
Virgio Martins	F/V Hercules	New Bedford, MA
Antonio Rico	F/V Luso American I	New Bedford, MA
Carlos Alberto	F/V Luso American I	New Bedford, MA
Alan Sherman	F/V Resolute	New Bedford, MA
Arlindo Casteira	F/V Sao Jacinto	New Bedford, MA
Antonio Pacheco	F/V Predator	New Bedford, MA
Antonio Oliveira	F/V Sandra	New Bedford, MA
Virginia Martins	F/V Can-Do	New Bedford, MA
Francosco Garcia	F/V Casa Blanca	New Bedford, MA
Dan Connors	F/V Early Times	Newburyport, MA
Mike Doyle	F/V Seafarer, F/V Charlies Pride	Point Judith, RI
Tim Hauser	F/V Shelby Ann	Point Judith, RI
Donald Fox	F/V Determination, F/V Stephanie & Bryan, F/V Excalibur, F/V Lightning Bay, F/V Rebecca Mary, F/V Tenacity	Point Judith, RI
Patrick Knapp	F/V Connoe & Michael	Point Judith, RI
Troy Sawyer	F/V Debbie Sue	Point Judith, RI
Steve Roebuck	F/V Margaret Holly	Point Judith, RI
James Haitz	F/V James & Matthew	Point Judith, RI
Tony Faciano	F/V Shelby Ann	Point Judith, RI
Steve Follett	F/V Heather Lynn	Point Judith, RI
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Jayson Driscoll	F/V Sweet Misery	Rye, NH
Jonathan Drake	F/V Paniolo	Rye, NH
Jean-Paul and Debra Metivier	F/V Debra Ann II	Salisbury, MA
Kevin Norton	F/V Yankee Rose	Scituate, MA
Dan Shannon	F/V Sorry Charlie	Scituate, MA
Kevin Shea	F/V Endeavor	Scituate, MA
Paul Unagst	F/V Destiny	Scituate, MA
Brainerd Ames	F/V Brenna Ashley	Scituate, MA
Frank Mirachi	F/V Barbara I Peters	Scituate, MA
Ronald Gustafson	F/V Cherylann	Scituate, MA
Charles Felch	F/V Lady Victoria	Seabrook, NH
Thomas Lyons	F/V Marion J	Seabrook, NH
Peter Bessette	F/V Miss Karyn	Stonington, CT
Phil Powell	F/V Foxy Lady	Swampscott, MA
Pete Fadden	F/V Catherine F	Swampscott, MA
William Borges	F/V Holly Jean	Westport, MA