



September 9, 2016

Terry Alexander, Acting Chairman
Groundfish Committee
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Terry,

NSC is writing to request the Groundfish Committee include provisions under Framework 56 to the Northeast Multispecies Fisheries Management Plan for Atlantic halibut that would be adopted for the 2017 fishing year and beyond. Specifically, measure /s that refine the accountability measure (AM) adopted under Framework 48 as well as a revision to the OFL / ABC specifications for the Atlantic halibut for fishing years 2017-2018.

Although final catch information has not been released for the 2015 fishing year, over the past few months, the Groundfish Committee and Groundfish Plan Development Team have been discussing potential increases in Atlantic halibut catch in the 2015 fishing year by the state subcomponent of the ACL.

It is known the commercial groundfish fishery did not exceed their portion of the sub-ACL in fishing year 2015. But Framework 48 contains area-based AMs that apply only to the federal commercial groundfish fishery regardless of the source of an overage. This includes a large gear restricted area above Groundfish Closed Area 1 on Georges Bank for trawl vessels and two fishery closures in the Gulf of Maine for fixed gear (sink gillnet and longline). Possession may also be reduced from one fish per trip to zero. These AMs, if triggered for the 2017 fishing year, will impose significant economic hardships upon the commercial groundfish fleet.

Fortunately, Framework 48 also contains language that allows AMs to be reviewed in a future groundfish action. *NSC strongly urges the Committee to use this authority to reevaluate and modify the AMs under Framework 56.*

Aside from the AM, it is apparent the present signals of abundance for Atlantic halibut greatly differ from assumptions that led to the specifications adopted for the 2016-2018 OFL / ABC for Atlantic halibut. *This is consistent with the contrary signals being seen over the past few years for many groundfish stocks.*

You'll recall the 2015 Operational Assessment held for all groundfish stocks did not accept the results from the assessment model as a basis for scientific advice for management for Atlantic halibut. There were many diagnostic issues identified. If the model had been accepted abundance estimates would have been much greater. Alternatively, another approach was used when establishing the OFL / ABC for Atlantic halibut. The catch advice generated from this alternative approach holds to a highly conservative OFL and ABC that is held constant from 2016 through 2018 (OFL 210 and ABC 158).

1 Blackburn Center
Gloucester, MA 01930
Tel: (978) 283-9992

The most recent information available concerning the abundance of Atlantic halibut is not being accounted for in the present OFL / ABC. The signals differ greatly from the assumptions accepted. NSC strongly urges the Groundfish Committee to recommend the New England Fishery Management Council direct the Science and Statistical Committee to revisit the OFL / ABC for 2017-2018 based upon the most recent information.

To conclude, disproportionate treatment is not what was intended by the Magnuson Reauthorization 2006 for ACLs and AMs. With this in mind, NSC supports Committee and Council efforts to encourage, and where possible regain, management consistency between the various subcomponents of the groundfish ACLs. For Atlantic halibut, NSC supports Council efforts to ensure catch is controlled to current requirements so federally permitted fishermen are not negatively impacted by groundfish catch exceeded by another subcomponent of the ACL.

Sincerely,

A handwritten signature in blue ink that reads "Jackie Odell". The signature is written in a cursive, flowing style.

Jackie Odell
Executive Director