

Correspondence

August 20, 2014

Dr. William Karp, Science and Research Director
Northeast Fisheries Science Center
NOAA Fisheries Northeast Region
166 Water Street
Woods Hole, MA 02543



Terry Stockwell, Chair
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

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

Dear Dr. Karp, Mr. Stockwell, and Dr. Kritzer:

We are writing to express our concern that the recent benchmark assessment conducted for Gulf of Maine (GOM) haddock did not adequately address the Term of Reference (TOR)¹ concerning mixing between the Georges Bank (GB) haddock and Gulf of Maine haddock stocks. We also wanted to notify you of our concerns relating to the treatment of the 2012 year class for GOM haddock when setting a future ABC/ACL for this stock.

One of the reasons why the NEFMC and NRCC prioritized the GOM haddock assessment for 2014 was due to the great disparity between the ABCs for the GB haddock and GOM haddock stocks. In fishing year 2013, the ABC for the Georges Bank haddock stock was approximately 29,335 mt or 100 times greater than the ABC for the Gulf of Maine haddock stock. Concern was expressed by many NEFMC members that the large biomass and newly reported year classes of the GB haddock being recruited into that stock would spill over into the Gulf of Maine, which would prompt a shutdown of fishing in the Gulf of Maine due to the very low ABC prescribed for the GOM haddock stock.

On April 23, 2013 the NEFMC passed a motion to “task the PDT and SSC to examine the issue of GB haddock spillover into the GOM stock area, provide an estimate of the amount of spillover when large year classes of GB haddock occur, and provide suggestions as to how the anticipated spill-over of the strong 2010 year class can be used to adjust the GOM haddock ABC for FY 2013, 2014 and 2015.”

After reviewing available data and literature on this topic, the PDT and SSC concluded in their reports to the NEFMC that exchange rates were not well characterized. The SSC further noted in their correspondence to the NEFMC in a Memo dated September 3, 2013 that “although the literature

¹ 3. Evaluate the hypothesis that haddock migration from Georges Bank influences dynamics of GOM stock. Consider role of potential causal factors such as density dependence and environmental conditions.

perhaps suggests an upper bound of 10% - this figure is not robust." The SSC also concluded that they could find "no scientific basis for adjusting haddock ACLs based on mixing or spillover."

Both the PDT and the SSC agreed that some mixing was likely but they didn't have enough information available to recommend a specific percentage or number. This prompted the NEFMC to prioritize a GOM haddock benchmark assessment during their subsequent discussions with the NRCC.

During the recent benchmark assessment for GOM haddock, the only material reviewed to address the mixing TOR was tagging data. Using this data Miller and Palmer concluded that "migrating rate estimates imply individuals starting in the Gulf of Maine have approximately a 94% probability of being in the Gulf of Maine for 1 year given they survived the interval. Individuals starting in Georges Bank have approximately 86% probability of being in the Georges Bank 1 year later." In summary, tagging data shows that 6% of the fish tagged in GOM migrating to GB and 14% of the fish tagged in Georges Bank migrating to the Gulf of Maine.

At the model meeting held for the assessment, Dr. Butterworth and Ms. Rademeyer conducted 3 scientific analyses on GOM haddock, using the SCAA model. The first analyses included an approach whereby the stock was treated as isolated, no mixing was estimated. The second analysis included an approach which allowed for interchanges in the form of permanent migration from (and to) the neighboring Georges Bank haddock population. The third analysis included an approach (known in the IWC Scientific Community as the sabbatical model) that allowed for interchanges which were not permanent in nature. The last analysis considered some GB haddock may visit the GOM area during a year, and perhaps be caught in the Gulf of Maine but if not suffering from mortality in some form, may return to the Georges Bank area (Butterworth and Rademeyer June 2014).

Dr. Butterworth and Ms. Rademeyer's model which addressed mixing between stocks was not selected as the final model sent to the Peer Review. The working group decided to only forward the Peer Review the assessment conducted by the NEFSC that did not include any consideration of mixing. Therefore, the only actual scientific model that explored mixing was not reviewed by the Peer Reviewers.

We hope in the days ahead the NEFMC, NEFSC and the SSC will be able to address this issue.

We also request the NEFMC and SSC look further into the application of uncertainty when estimating the strength of year classes and their impact on future recruitment estimates, as well as their impact on setting ABCs. This is in specific reference to the 2012 GOM haddock year class where there is a recommendation to down-weight the survey indices by 50%, but it also presents a broader question. Is there consistency in the treatment of the data? Does the scientific process consider uncertainty associated with extraordinarily low survey results in the same manner as it does for optimistic results? Has the process examined the impacts to a fishery when an overly pessimistic result has later proven by an updated assessment to be wrong?

Sincerely,

Maggie Raymond
Associated Fisheries of Maine

Vito Giacalone
Gloucester Fishing Community Preservation Fund

Jackie Odell
Northeast Seafood Coalition

August 21, 2014



To NEFMC SSC:

As a career fisherman with more than 36 year experience, I am writing to express my concerns about the PDT recommendation for Gulf of Maine haddock. Specifically, the PDT is recommending that the model sensitivity run, which discounts the 2012 year class of haddock, should be used to set the ABC for Gulf of Maine haddock for the 2015-2017 fishing years. This is essentially what was done with the 2010 year class in setting shockingly low ABCs for this stock for the 2012-2014 fishing years. In 2013, the recreational fleet, using passive fishing gear, caught almost the entire ABC for Gulf of Maine haddock, and the commercial fleet forfeited tons of other valuable catch while running away from Gulf of Maine haddock.

It's hard for me to understand how we can have the largest amount of fish in the time series (if not discounted) and the second largest if discounted and still come up with an ABC that isn't even close to an average catch in the Gulf of Maine.

I strongly urge the SSC to dismiss the PDT's ABC recommendation that results from the sensitivity run (temp 11 run) and instead accept the ABC recommendations that result from the final model (temp 10 run) and described by the SAW as "most realistic".

I disagree with the PDT's take on haddock spillover. The question of haddock spillover was the major reason the Council asked for a benchmark assessment. Most of us (fishermen) think it is occurring but it is hard to quantify. The PDT's memo to you says "perhaps the rate is considerably less than 1%", though the tagging data shows mixing rates of 9 and 14%. I just wanted to remind you that a 1% spillover would amount to 290 tons of catch.

The PDT's memo also discusses changes in selectivity, because of changes in the minimum fish sizes. We have not changed the mesh size so we haven't changed selectivity. We are catching more small fish because there are more small fish available.. These fish have spawned at least once if not twice to contribute to the stock.

I am also writing to request that the PDT provide a scientific explanation of the decision making process for when survey indices are discounted (e.g. both haddock stocks in recent assessments) and when the survey indices are taken at face value (e.g. Gulf of Maine cod).

Thanks
Terry Alexander
F/V Rachel T
F/V Jocka

SSC/CBK 8/21/14

David T. Goethel
23 Ridgeview Terrace
Hampton, NH 03842

August 18, 2014

Dear SSC, small mesh PDT, and Council members,



As former chair of the whiting committee, I am concerned with the upcoming specification setting for red hake. Because I chaired the last specification setting process, I felt unable as chair, to express my views that the specifications for red hake, especially the so called northern stock, was an order of magnitude too low and not remotely reflective of the status of the stock. Since then, those concerns have been realized with the ACL being overrun by 45% percent in 2012 giving the perception of over fishing. Why is this occurring? The answer can be found in a number of places.

First, red hake is an index based stock. In order to get an accurate index you have to tow where the fish live. Many of the principal hake grounds listed in "Fishes of the Gulf of Maine" (Bigelow and Schroeder) pg. 227 are, "centers of abundance for them inshore are along the coast of Maine between Machias and Mount Dessert Island, in Frenchman's Bay, the ground known as the Grumpy near Isles of Haut and off Penobscot Bay...". They go on to list numerous grounds inshore around the Gulf of Maine including the only area now open to small mesh fishing, Ipswich Bay. The point is there are two things all these grounds have in common. They are completely filled with lobster traps and there is no small mesh fishing in any of them. The survey will not tow where there is fixed gear, thus your index is completely inaccurate. This gives you an artificially low index which then is caught by ten boats fishing in twelve square miles in Ipswich Bay in less than a month, this from a fishery that had consistent landings of around 1100 tons, never mind discards, when all these grounds were open to fishing.

Next please consider how we came to have two stocks of red hake. This country often set stock boundaries for political reasons. Foreigners, particularly Eastern Europeans, were interested in harvesting red and silver hake for reduction in the 1960's. The State Department and the Navy did not want them near their military bases in the Gulf of Maine. By having a small stock in the north they could force the foreigners out under their MSY management strategy without having to acknowledge the need for the 200 mile limit. For a full discussion of this subject please consult "All the Fish in the Sea" by Carmel Finley. Indeed, there is no biological reason for two stocks that I can find. In, "Fishes of the Gulf of Maine", (Collette and Klein-Mac Phee) pg. 256, it states "two stocks have been assumed" with no further biological explanation.

Finally, please consider that the center of many stocks has moved to the north and east during the last fifteen years. Just as in Henry Bigelow's time of the early 1950's, when water temperatures warmed substantially, large numbers of red hake are appearing on George's Bank further exacerbating the problem of two stocks. These fish have probably moved north from southern New England.

So what is the solution? In the long term the trawl survey has to start moving fixed gear so that it can adequately sample fish populations in the inner part of the Gulf of Maine. This is not only a problem for red hake, but for every other species inhabiting these areas. I believe it is the major reason for increasing uncertainty in a number of our stock assessments. That is a long term fix. In the short term

SSC/CBIC - 8/18/14

the SSC should request that the council consider setting an ABC and ACL for red hake throughout its range. This would solve the problem of fish moving based on water temperature and allow more than adequate fish for the small mesh fisheries in all open areas to continue to operate. Absent this change you will have the appearance of overfishing in the north, the defiance of common sense, and yet another problem to deal with where none is warranted.

Sincerely,

David Goethel
Owner/Captain
F/V Ellen Diane

From: Capt. Testaverde
Sent: Thursday, August 21, 2014 2:38 PM
To: Andrew J. Applegate
Subject: Red hake

Andy I am writing this letter to you about the red hake assessment which I think something is wrong with and please pass this on to council members ,and the plan development team and who ever. I have fished for silver & red hake for over 35 years now and think I know a little something about this stock that N.M.F.S. Is saying the northern stock is in danger. And has put very low quota on that are using stock assessments from the 1980's & 90's . To start with I think their should be no north & south stocks because fish have no boundary ,and work with feed & water temperatures which have changed dramatically in the last decade . And are using pas landings from 10-20-30 years ago is 'dumb. During those earl years we had 20 -25 or more boats fishing small mesh in Iswich bay and around Gloucester and had at another 20 or so fishing from Gloucester & rhoad Island at the cultivator. now maybe 8 boats inshore and 8-10 off shore all bringing in red hake with their silver hake catches so EFFORT is down dramatically .also in the north area was P. Town with a fleet of 15-25 or more fishing sm mest summers & fall . The fleet of Gloucester fishing ling [red hake] and whiting from the boon island to middle banks till Dec. & Jan.down 40-50 fat curve . The flowing is a list of areas were I targeted ling with our three family boats

- 1 in iswich bay and inside the three mile limit when it was open but can't go inside any more and is full of lobster gear
- 2 off thatchers island 50-60-fat and long beach 28-34 fat can't go no more it's out of small mesh area
- 3 rosey's & Lucy's hole east of gloucester was a big ling fishing area fishing in the pass one or two tow's and get 15000-20000 lbs all lings can't go closed area
- 4 the scollop grounds was a big ling area also can't go no more in closed area
- 5 some gloucester boats fished just out side gloucester just outside 3miles at half hour closed because outside small mesh area
- 6 First edge was another big time place for lings going for market & bait bringing in 15-25 thousand per trip at times but now in closed area
- 7 Jeffery's in the winter 80-120 fat. Is in closed area
- 8 Boon Island 40-60=fat now off limit because full of lobster gear
- 9 Eastern side of Jeffery's ledge 100-130 fat was a big time ling area just before mother's day and after like clock work no more in closed area
- 10 Wilkinsons basin out of small mesh area
- 11 off nauset's beach using raised footrope passing over them now

Takeing into consideration since the raised footrope trawl and just four small areas allowed for season openings the catch rate for ling is at 50-60 %of what it could be caught .we used to target lings back when we had markets in Philly & Baltimore and had big bait market for lobsters before the big herring boats showed up . Again water temperatures has a big role in fish movement as they seek cooler water THATS WHY N.M.F.S. \$\$\$\$\$ dollar boat cant fine them and are probably towing to fast THAT'S why we call them mud hake . And another point is before the shrimp great we would catch red & silver hake and come in with trips of 7-10 thousand shrimp and 7-10 of ling & whiting . IN CONCIUETION if you think a few boats fishing in a few pond size areas are catching all the red hake then I lost all my faith in science I think to solve this quota problem is to make it one area not north & south . DO YOU SEE THE TREND IN REDUCED EFFORD in the north I also would be willing to do test with a raiser foot fope trawl and a controlled chain net like we used in the pass to show how many red hake can be caught . AND I strongly support a limited assess for small mesh to help keep effort down .

Thank you for your time

Capt Tom Testaverde
F/V Midnight Sun

Public comment.

From: Jim Ford

Date: August 22, 2014, 2:07:57 AM EDT

To: Nefmc <pfiorelli@nefmc.org>

Cc: Johanna Thomas Thomas <jothomas@edf.org>, Bill Hoffman <bill.hoffman@state.ma.us>, <john.bullard@noaa.gov>, Amy Martin <Amy.Martins@noaa.gov>, Steve Eayrs <steve@gmri.org>, Hank Soule <shsector@gmail.com>, John Hoey <John.Hoey@noaa.gov>, Dan salerno <daniel.j.salerno@gmail.com>, Dave Leveille nefs02@gmail.com

Subject: Party/ Charter

I usually do not care what goes on in the Party/Charter side of things ,but it makes no sense at all to shut them down Sept 1st for cod and haddock. They are now going to keep fishing and target pollock and reds and cusk which are in the same places as the cod and haddock. They are not changing gear to be fish specific. This is absolutely ridiculous to think this is saving fish. A dead fish is still a dead fish. Mortality on haddock in my opinion is at a minimum of 80 percent and cod varies maybe 20 percent depending on water temp and if foul hooked and so on. What I really don't understand is why they are not required to carry observers as the commercial sector. If you want full data like it seems NOAA wants why not spread the coverage across the board. NOAA is already sending them on groundfish, squid, scallop, whiting ,herring and trying to get them on lobster boats . Anything more than a 6 pack vessel should be observed. They get a lot of the juvenile fish that the commercial sector don't see as much of and you would get a pile of closed area data (Jeffrey's ledge) especially. I would think the more data available the better job can be done to help all that are involved in the decision making. By the way we have been observed 10 out of the last 14 trips ,don't think they stopped stacking observers yet! Sounds like what's going on with everyone , this is not a way to get quality data. Thanks Jim Ford

F/V Lisa Ann III