



L. D. Amory and Company, Inc.

Wholesale Seafood Since 1917

101 S. King St. • P.O. Box 518 • Hampton, VA 23669
Phone (757) 722-1915 • Fax (757) 723-1184

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Science Statistical Committee

While reviewing the Summer Flounder Assessment data and considering a recommendation for the 2016 quota, we would like to ask you keep several important points in mind:

1. Over the last 2 years our fishing vessels have seen an increase in smaller fish. This is supported by the NEMAP 2014 fall and 2015 spring data. We understand low recruitment is a serious concern and we are excited to see that trend has already begun to rebound.
2. Fishing Mortality may have been underestimated over the past several years , but should now be returning those estimates at least in the commercial industry for 2 reason:
 - A. More boats are using conveyors to cull the catch which allow live fish to be returned to the water untouched. It is estimated that more than 50% of the fleet has moved to this system.
 - B. Evidence of substantial illegal harvest associated with the RSA program has been eliminated and should no longer be a factor that likely contributed to the patterns of the last few years
3. If we had an assessment in 2014 many of these issue might have been addressed and we would not be faced with these devastating reduction.

4. Have the projections assumed the entire ACL has been taken for the last few years? There have been persistent under harvest especially in the Recreational harvest.

Considering these issues a 45 % reduction in one year does not appear warranted. We would like the SSC to consider the possibility of spreading it out over a 3 year period with the possibility of making adjustments up or down as needed.

Thank you for your consideration in this matter.

Meade Amory

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