

**Testimony of James Gutowski
Chairman, Fisheries Survival Fund
before the
Subcommittee on the Coast Guard and Maritime Transportation
House of Representatives Committee on Transportation and Infrastructure**

**Regulation of the Maritime Industry:
Ensuring U.S. Job Growth While Protecting the Environment and Worker Safety**

April 26, 2012

Chairman LoBiondo, Ranking Member Larsen, and members of the Subcommittee, thank you for this opportunity to testify today. I am James Gutowski, a scallop fishermen and vessel owner from Barnegat Light, New Jersey. I am also Chairman of the Board of the Fisheries Survival Fund ("FSF"). I am part owner the *F/V Kathy Ann* and others which fish out of Viking Village in Barnegat Light. I am also a member of the Garden State Seafood Association ("GSSA"). GSSA contributed to and shares in my remarks today.

I. Introduction

Today, I am testifying on behalf of the FSF. I am accompanied today by Kirk Larson, a fellow scalloper, participant in the FSF, and the mayor of my town, Barnegat Light. Founded in 1998, the FSF is a non-profit organization whose participants include over 200 full-time Limited Access Atlantic scallop fishing permit holders along the New England and Mid-Atlantic coast. Since its founding, FSF has advocated on behalf of its participants in the federal fisheries management process, before Congress, and, when necessary, in court.

We take a lot of pride in the significant role FSF has played in making the Atlantic scallop fishery sustainable and the most profitable fishery in the country. FSF has worked to improve scallop fishing gear, fishing practices, and the regulatory regime to provide reasonable protections for the environment and fishermen alike.

Through participating in and funding cooperative research, we have been able to enhance the information and techniques used to manage our fishery. We have made it a priority to minimize our impact on the marine habitat and reduce interactions with non-target species, including both finfish and sea turtles.

While I always appreciate the opportunity to speak about the scallop fishery, I am here for another reason today: the new fishing vessel safety regulations contained in the Coast Guard Authorization Act of 2010 ("Authorization Act") and the application of the EPA's Vessel General Permit ("VGP") to fishing vessels. Both of these regimes would impose significant additional requirements and restrictions on our operations. Our concern is that the pace of the new regulations out-strips both the Federal Government's and the fishing industry's ability to implement these ambitious programs. We are also concerned that the Environmental Protection Agency ("EPA"), which is designing the VGP program, lacks sufficient understanding of how fishing vessels operate to develop and implement a workable program. I recognize and greatly

appreciate that this Subcommittee shares many of the same concerns and has taken positive steps to address some of the issues raised here today via H.R. 2838, the Coast Guard and Maritime Transportation Act of 2011, which passed the House last November.

II. Coast Guard Fishing Vessel Requirements

First, I must commend and thank the Coast Guard for all they do to protect fishermen throughout this country, including those of us at Viking Village. With that being said, I do have some significant concerns with some of the new Coast Guard requirements for fishing vessels. As I will explain, I believe that I share many of these concerns with the Coast Guard itself.

The 2010 Coast Guard Authorization Act enacted wide-ranging changes to the requirements fishing vessels face. Among other things, the law heightened the standard for survival craft, required ongoing training for fishing vessel captains and crews, imposed certification requirements, mandated dockside vessel safety inspections, and required certain newly constructed vessels to be classed and have load-lines, while other vessels have to meet an alternative compliance program. The industry recognizes and appreciates the need for increased safety, but there are details with the implementation of these latter requirements which need refinement.

A. Mandatory Fishing Vessel Inspections

As an initial matter, FSF would like to express its appreciation to the Coast Guard and Maritime Transportation Subcommittee for its leadership in seeking to amend Section 604 of the Authorization Act. Specifically, H.R. 2838, the Coast Guard and Maritime Transportation Act of 2011, now awaiting action in the Senate, would extend the time for the United States Coast Guard to initiate its mandatory dockside fishing vessel safety examination program. The dockside inspection program currently is scheduled to come into effect by October 2012. H.R. 2838 postpones this mandate until October 2015 and requires inspections every five years, rather than every two years. We fully support these legislative adjustments, which would put the fishing vessel inspection program on the same implementation and five-year renewal schedules as other maritime sectors.

We at the FSF are concerned that if the Senate does not act, the new biennial dockside inspection requirement will overwhelm the Coast Guard's current ability to inspect vessels in a timely manner. The universe of vessels that will be subject to the mandatory inspection and certification program will range from 30,000 to 35,000. The Coast Guard currently inspects only some 8,000 vessels per year under the current voluntary inspection program. If not granted the proper amount of time to develop the program, the Coast Guard may not be able to certify all vessels, potentially forcing vessel owners to remain tied to the dock for an indeterminate period of time. Our captains and crew are not salaried, and need to go fishing to support their families.

The Coast Guard shares our concern about workable implementation of the Authorization Act's inspection timetable. Indeed, at this Subcommittee's May 24, 2011, hearing, "Creating U.S. Maritime Industry Jobs by Reducing Regulatory Burdens," U.S. Coast Guard Rear Admiral Kevin Cook testified to likely problems his agency will have implementing the dockside

examination program for fishing vessels. Representative Guinta specifically asked whether it would be appropriate for the Subcommittee to consider an extension, to which Admiral Cook replied, “if there was an additional time, [the Coast Guard would] be able to develop a more systematic program.”

The FSF very much agrees with this position and appreciates this opportunity to supplement the record to support the House’s position on this important matter. Unlike the towing industry referred to by Admiral Cook in his testimony last May, no single, overarching association represents the commercial fishing industry. As a result, the Coast Guard will need to work with many different fishing associations, fishery sectors, and even individual fishermen in many, often remote coastal regions to help facilitate this program. The Admiral is thus correct when he states that it will take time for the agency to develop a “systematic” approach for devising and, more importantly, implementing the inspection and certification program.

Given the looming deadline and need for additional time for planning to implement the ambitious mandatory dockside inspection program, the industry will work to educate the Senate Committee on Commerce, Science, and Transportation’s Oceans, Atmosphere, Fisheries, and Coast Guard Subcommittee on the need for this change in existing law. Our hope is that if the Senate acts to pass a version of the Coast Guard and Maritime Transportation Act, the House continues to insist on this and other important provisions discussed below, and comes to speedy resolution of these important issues.

In conclusion, we share the Subcommittee’s commitment to safety for this industry. Granting the Coast Guard the time it needs to implement this complex program and modifying the examination schedule will ensure that the Authorization Act’s safety goals are met in a fair and practical manner.

B. Load-Line Requirement

The Authorization Act amended section 5102 of Title 46 to require that every fishing vessel of 79-feet or greater that is built after July 1, 2012, have a load-line assigned. The Authorization Act also requires any such fishing vessel built before July 1 of this year to enter an alternative compliance program if it undergoes a substantial change to its dimension or type. Under the terms of the Authorization Act, this alternative load-line compliance requirement does not become effective until such a program is “is developed in cooperation with the commercial fishing industry and prescribed by the Secretary.”

While FSF acknowledges that several fishing vessel casualties have been linked to failures related to stability, this new rule poses a significant hardship to the fishing fleet. Load-lining a vessel is an extremely expensive regulatory requirement. Because this requirement for newly-built vessels was mandated in the Authorization Act, FSF understands that the Coast Guard is taking the position that it does not need to undertake any small business economic impacts analysis under the Regulatory Flexibility Act. In fact, to date, no regulations have been issued for either the load-line or alternative compliance program requirements.

Indeed, it appears the Coast Guard is simply following in the footsteps of Congress, which itself may have failed in its statutory duty to conduct economic impact analyses before it enacted the Authorization Act. The Unfunded Mandates Reform Act of 1995 (“UFMA”) requires Congress to assess the direct costs imposed on the general public by a “federal private sector mandate,” such as this and the vessel classification requirement which my testimony addresses next.

Such direct costs include the aggregate estimated amounts that the public sector will be required to spend to comply with the new statutory mandates. If these costs exceed \$139 million (\$100 million, adjusted for inflation), the UFMA also requires, among other things, that Congress prepare qualitative and quantitative assessments of the costs and benefits of the new private sector mandate, as well as to discuss steps taken by the committee of jurisdiction to avoid such adverse economic impacts.

The 2009 House committee report for the Authorization Act states: “The aggregate costs of the mandates in the bill on private-sector entities are uncertain because many of them would depend on regulations to be developed under the bill.” The Congressional Budget Office thus could not determine if the mandates set forth in the Authorization Act exceeded the \$139 million threshold or not.

Just looking at my one small sector of the overall U.S. fishing industry, I can testify that the costs to load-line or class a vessel are major. Requiring load-lines and classing a new scallop vessel, as explained below, add an extra million dollars to its construction cost. Nor is the alternative load-line compliance program likely to be inexpensive. The alternative compliance program will increase costs of retrofitting “older” vessels to make them safer and more efficient. Given the compliance costs for the scallop sector alone, it is clear the economic impact of these and other new Authorization Act requirements will easily exceed the \$139 million threshold for the industry nationwide. This Subcommittee should take this opportunity to take a more clear-eyed look at the mandates the Authorization Act would impose on small business fishermen, particularly in this economy. Neither this issue, nor that of classing fishing vessels and discussed below, were addressed in H.R. 2838.

FSF also encourages the Committee to require the Coast Guard to conduct a cost-benefit analysis and small business impact analysis of this rule before it is fully implemented—and in sufficient time to make any legislative changes which these analyses suggest.

C. Classing of Vessels

Related to the load-line requirement, the Authorization Act amended section 4503 of Title 46 to require that new vessels larger than 50-feet must be designed, constructed, and maintained to the standards of a classification society. The law also now requires such a vessel to enter an alternative compliance program if it is either rebuilt or repurposed, or else is simply more than 25 years in age in 2020.

To build a new scallop vessel costs approximately \$4 million. After consulting with the shipyards with which we do business, we have been informed that the new requirements will add

25 percent to the cost of building a new vessel, that is, \$1 million per vessel. This significant increase in cost will cancel several orders for new vessels, with the attendant loss of shore-side work.

In addition to the as-yet unevaluated economic impacts on fishing industry participants, the law of unintended regulatory consequences should be studied—a point Office of Information and Regulatory Affairs head, Dr. Cass Sunstein, has often made. As U.S. fishermen, we are required by law to build our vessels in this country, and so we already have to pay a premium price to construct new vessels. As the Coast Guard has mentioned on several occasions in testimony before this Subcommittee and elsewhere, the Nation’s fishing fleets are aging. In fact, the scallop fleet is one of the few fleets in the country that is currently able to recapitalize. For most fishing fleets, however, the profit margins are way too low for any fishermen to consider building a new vessel. This new requirement, while certainly a well-intentioned one, will likely have a detrimental impact on fishing vessel safety as it will forestall the introduction of new and safer vessels into the fishing fleet.

One solution to this problem is a simple repeal of the classification requirement. If the Subcommittee is not amenable to a repeal, then FSF proposes that Congress investigate alleviating some of the cost pressures on building a new fishing vessel in the United States. Safety is clearly the goal of everyone at this hearing, and we all know that a newer vessel is inherently safer than an aging vessel. Let’s have a serious conversation about how we can encourage the replacement of older vessel with new, safe fishing vessels. Under the (relatively) recently-amended Magnuson-Stevens Fishery Conservation Act’s new “annual catch limit” management regime, conservation benefits can no longer be achieved by requiring fishermen to have inefficient, older fishing vessels. Congress needs to change the playing field. If safety is the goal, it should support, rather than impede, the replacement of aging, potentially unsafe fishing vessels by lowering the costs of production.

III. EPA’s Vessel General Permit

First, I must preface my comments on the VGP with a general observation. It is readily apparent from the way it has approached the regulation of fishing vessels that EPA does not have the internal capability to understand and effectively regulate the fishing industry. This fact is highlighted by the EPA’s cursory and, I believe, inaccurate assessment of the economic impacts of the VGP on small business fishermen. We recognize that a court order under the Clean Water Act (“CWA”) is forcing EPA to deal with this issue, but that not change the fact that any regulations it develops as a result must actually be workable within the heavily regulated and complex fishing industry.

Once again, this is an area where the Subcommittee, the full Transportation and Infrastructure Committee, and the House of Representatives have taken leadership. FSF strongly supports the changes made in Section 703 of the 2011 Coast Guard and Maritime Transportation Act, which exempt commercial fishing vessels from the need for a CWA incidental discharge permit. Instead, as you know, the EPA and Coast Guard will be required, should this provision become law, to consult on cost-effective “best management practices” to reduce the impacts of incidental vessel discharges on our nation’s sensitive waterways. Section 703 also, sensibly in

our view, puts the Coast Guard in charge of promulgating any new requirements. As with the proposed changes to the dockside vessel inspection program, FSF and others in the industry will work with the Senate in seeing that these changes are implemented.

The need for changes such as those in H.R. 2838 are highlighted by the EPA's Notice of Proposed Rulemaking to implement the VGP requirement for fishing vessels, issued on December 8, 2011. EPA's proposed regulations are, in many respects, counter-productive. In far more than one instance, they would mandate unsafe practices or else require a vessel to violate a fisheries regulation to comply with VGP requirements. FSF is also extremely concerned about how the CWA is applied to fishing vessels that are mobile and frequently land in multiple states within a fishing year, making them subject to widely differing state requirements under the CWA. In this respect, FSF hopes that, if adopted, the Coast Guard and Maritime Transportation Act makes clear that neither states nor tribes are free to impose additional restrictions or requirements on highly mobile fishing vessels. The fishing industry is already one of the most highly regulated industries. Introducing direct EPA regulation into the mix will only exacerbate matters.

We are concerned in particular about the following VGP mandates, most of which could be addressed if Congress were to adopt H.R. 2838. At the very least, these issues demonstrate that the Coast Guard, not EPA, should take the lead in addressing new vessel requirements.

A. Eligibility

At the most fundamental level, the EPA's decision to use a 79-foot cutoff to differentiate VGP coverage among the fishing fleet¹ bears no relationship to the operation of our fishing fleets. This arbitrary dividing line would include some FSF participants within the VGP requirements, while excluding others. This random outcome causes the type of economic imbalances within the fleet that we have been working hard to avoid. Further, no owner in his right mind would replace an aging, maybe unsafe 75-foot fishing vessel for a newer, safer 85-foot vessel if that meant he would need to comply with the VGP requirements. Accordingly, if forced to proceed under the terms of EPA's proposed permit, we recommend that the terms of the sVGP be used for all fishing vessels to ensure consistent treatment in our industry. At the very least, a more sensible dividing line would be the same greater than 165-foot overall length used for setting conditions on eligibility for fisheries endorsements.

B. Electronic Reporting

The EPA is proposing a requirement that all reporting be done electronically and that temporary waivers may be granted if justifiable. FSF believes that requiring all commercial fishing vessels over 79-feet to submit electronic reports is not technologically feasible. Many fishing vessels have limited means to report electronically and the challenges of the marine environment make electronic reporting more difficult and costly. Both paper and electronic reporting must be an option, assuming these reporting requirements are adopted.

¹ That is, fishing vessels 79-feet and over are covered by the VGP, while those under are covered by a less stringent "small vessel general permit" ("sVGP"), with much less burdensome reporting and compliance mandates.

C. Effluent Limits and Related Requirements

EPA in its proposed rule would require the use of environmentally-acceptable lubricants (“EAL”) in all machinery and equipment when discharges of oil to surrounding waters are likely to occur, *unless such use is technically infeasible*. We are concerned about the cost and performance of these products, and we recommend an exemption be provided for prohibitive costs, as well as technical infeasibility. In addition, engine manufacturers may specify other lubricants in their operating manuals, and a fishing vessel’s failure to adhere to those specifications because of new EPA requirements could void engine warranties.

D. Cathodic Protection

The use of sacrificial anodes is necessary to protect expensive equipment from electrolysis when it comes into contact with seawater. Sacrificial anodes are made of materials with a different electro-chemical composition from the metal they are designed to protect, allowing seawater to corrode the anode instead of the protected structure. The EPA proposes that vessel operators use the least toxic metals (such as magnesium), and document their choices in their recordkeeping. Zinc is the only effective and readily available noble metal alternative, but the EPA does not clearly articulate whether cost savings and effectiveness are acceptable reasons to use zinc as opposed to magnesium or aluminum anodes. We recommend the EPA remove the draft permit language regarding anode changes and compliance or clarify that cost savings, availability, effectiveness, and technological feasibility all be considered acceptable justifications.

E. Graywater

The EPA has proposed that all vessels minimize graywater discharges in port. If a vessel cannot store graywater, its production must be minimized while in port. These requirements are not workable for the fishing industry. First, our vessels are not equipped to store graywater, meaning there is no alternative to discharging some amount while in port. It is important for the Subcommittee to understand that crewmembers may live on vessels for some period of time when the vessel is in port, thereby complicating a requirement to minimize graywater discharge and production. Water is essential to the operations of a fishing vessel while in port. This is yet another example of EPA’s basic misunderstanding of how fishing vessels operate.

F. Seawater Cooling Overboard Discharge

The EPA requirement to discharge seawater cooling water overboard only when the vessel is underway is not technologically feasible. Nor does it reflect knowledge of the equipment commonly used on board commercial fishing vessels or the regulatory requirements applicable to fishing vessels. First, refrigeration condensers are in use at all times, circulating ambient seawater as needed to maintain efficient cooling. Effective refrigeration is critical to maintaining the product quality and safety of our fish products. Although the discharge is sometimes a little warmer than the ambient water, there is no way to capture this seawater discharge, and so it should not be a requirement to do so.

Nor will scallop vessels be able to comply with scallop fishery regulations under the EPA proposal. Even when a scallop vessel is in port, it still is required by regulation to operate a

satellite tracking unit called a vessel monitoring system, or “VMS,” to enable NOAA Fisheries to monitor the vessel’s location. To operate the VMS unit at the dock (which a scallop vessel must very often do), the vessel must run its generator, and there will be discharges of seawater cooling. Wet exhausts and cooling water discharges cannot be captured or stored. Therefore, to comply with one federal requirement, a scalloper would have to violate another.

G. Fish Hold Effluent

The EPA’s prohibition on the discharge of fish hold effluent presents concerns for many fishermen in general, and scallop fishermen in particular. First, the proposed regulations would prevent the discharge overboard of any unused bait unless the bait had been caught “in that waterbody.” For ocean waters, how is “waterbody” defined? The impacts of this are potentially enormous.

For instance, New Jersey fishermen harvest a wide range of bait species, including squid, Atlantic herring, Atlantic mackerel and Atlantic menhaden. To varying degrees, these fish are frozen and shipped all over the United States for use as bait and chum (macerated fish) . Is it the intent of the EPA to prohibit chum from New Jersey entering a “waterbody” in the Gulf of Mexico? The reliance upon New Jersey bait products is essential to commercial and recreational fisheries all over the United States, not to mention to the New Jersey coastal communities that produce that bait. FSF respectfully submits the EPA has set an inappropriate standard for commercial fishing in the ocean, and it should be deleted.

The proposed EPA regulation may have unanticipated consequences for the scallop fishery, as well. Federal regulations require scallopers to shuck scallops at sea, returning the shells and viscera to the water. The shucking at-sea requirement is a crucial conservation component of the fishery management plan, in that a scallop vessel’s catching power is limited by how many scallops a seven man crew can shuck on a time-limited fishing trip. Health, economic, and safety/stability considerations also counsel strongly in favor of shucking scallops at sea, rather than deck-loading them, and then shucking and disposing of the related waste on-shore. If a scallop vessel moves from one area to another while its crew is shucking, are there circumstances under which they might be considered to be changing water bodies?

H. Extended Unmanned Period (EUP) Inspections

The current EPA-proposed requirement of a 13-day minimum and 2-week inspection period is overly burdensome. The full-time Limited Access scallop fishery in which I participate is strictly limited in how often we may go to sea. In a typical year, a scallop vessel is only at sea for approximately 60 days. Requiring an inspection every two weeks is unreasonable in that circumstance. FSF recommends the following, alternative EUP schedule:

- A pre-Layup inspection for a 90-day minimum period;
- If the unmanned period is greater than or equal to 90 days, we recommend a monthly inspection requirement initiated on the 90th day; and
- A post-Layup inspection before returning to service.

I. Definitions

Certain definitions in EPA's VGP proposed rule fail to understand how fishing vessels operate, and should be modified, in the following ways:

- "Deck runoff" should be modified to cover only washdowns of a vessel. Precipitation and seawater falling on weather decks is unavoidable and the consequences of heavy rain or heavy seas are unpredictable. In the weather conditions prevalent in the Atlantic Ocean, some discharge as a result of rain or wave runoff is inevitable, and prevention is futile. Actually, prevention of runoff is dangerous, as free surface water makes vessels extremely unstable.
- "In port" should be modified to include only designated anchorages or while tied to a dock or mooring buoy. Commercial fishing vessels often seek shelter from weather and sea conditions in protected bays along the coast without tying up to a dock. Their decision to obtain safe haven should not preclude them from normal operations, including cooking, maintaining personal sanitation, and preserving the quality of their catch.
- "Oil" should be modified to specifically exclude fish slime or fish residues so that the stringent requirements surrounding fuel and engine oil and lubricants do not encompass natural residue from a vessel's catch. A similar change needs to be made to "oily mixture."

J. Availability of Individual Vessel Permit Information

EPA has not clarified whether the recordkeeping information submitted by permitted vessel owners or operators will be made available to the public. We believe the information submitted to the EPA by permitted individuals should be protected to the greatest extent possible. Pursuant to the Magnuson-Stevens Act, NOAA and NMFS go to great lengths to properly protect the fishing industry from revealing crucial trade secrets, and EPA needs to do the same.

IV. Conclusion

I very much appreciate this opportunity to share these concerns with the Subcommittee and for your attention to these very important issues. I also want to thank the Subcommittee for its proactive efforts to balance the need for safety, environmental protection, and an economically sustainable commercial fishing industry. This industry faces many challenges, from increased conservation requirements to the dangers inherent in the profession. I, FSF, and the fishing industry more broadly share your interest in minimizing these dangers to the greatest extent practicable, as well as preserving the marine environment on which our livelihood depends. No one has more at stake in these matters than working fishermen.

With that in mind, I sincerely hope you give serious considerations to the above comments and recommendations. These changes, many of which have been incorporated into the Coast Guard and Maritime Transportation Act of 2011, strike a reasonable balance among safety, the environment, and the need to make a living in these difficult times. Thank you very much for your time and attention.

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE
Truth in Testimony Disclosure

Pursuant to clause 2(g)(5) of House Rule XI, in the case of a witness appearing in a nongovernmental capacity, a written statement of proposed testimony shall include: (1) a curriculum vitae; and (2) a disclosure of the amount and source (by agency and program) of each Federal grant (or subgrant thereof) or contract (or subcontract thereof) received during the current fiscal year or either of the two previous fiscal years by the witness or by an entity represented by the witness. Such statements, with appropriate redaction to protect the privacy of the witness, shall be made publicly available in electronic form not later than one day after the witness appears.

(1) Name:

James M. Gutowski

(2) Other than yourself, name of entity you are representing:

FISHERIES SURVIVAL FUND

(3) Are you testifying on behalf of an entity other than a Government (federal, state, local) entity?

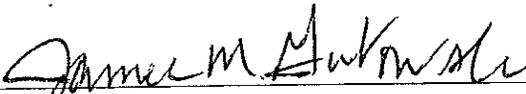
YES

If yes, please provide the information requested below and attach your curriculum vitae.

NO

(4) Please list the amount and source (by agency and program) of each Federal grant (or subgrant thereof) or contract (or subcontract thereof) received during the current fiscal year or either of the two previous fiscal years by you or by the entity you are representing:

Signature



Date

4/23/12

(4) Federal grants

I receive no federal grant money. For completeness of the record, however, my vessels have participated in scallop gear and loggerhead turtle research in conjunction with the Coonamessett Farm Foundation and the Virginia Institute of Marine Science ("VIMS"). This research is funded by a set-aside of annual scallop total allowable catch. Coonamessett Farm and VIMS make proposals for scallop and protected species research that the National Marine Fisheries Service and the New England Fishery Management Council consider and approve. To fund this research, these entities are allocated an amount of scallops to harvest for sale. My vessels have been used to harvest these scallops, and are occasionally used as a platform for research. The vessels and crews are retained under contract with the researchers, receiving a portion of the proceeds from the scallops harvested and sold under the set-aside program.

James Gutowski

Education:

Seton Hall Preparatory School 1979

University of Rhode Island – Commercial Fisheries and Marine Technology 1979-1980

New Jersey Agricultural Leadership Program 2001-2003

Marine Resource Education Program- GRMI 2007

Associations:

Fisheries Survival Fund (Chairman Board of Directors)

Garden State Seafood Association

Blue Water Fisherman's Association

Employment:

Crew member various scallop and long line Vessels, Montauk NY and Barnegat Light NJ 1980-1984

Captain F/V Lori-I and F/V F. Nelson Blount, Barnegat Light NJ 1984-1989

Owner /Operator F/V Kathy Ann, Barnegat Light NJ 1989-1997

Operation Manager/ Owner F/V Kathy Ann 1997-Present

Viking Village Commercial Seafood Producers: sales, A/R manager 1997-2006

Operation Manager / Owner F/V Elizabeth 2000-Present

Administrative manager Larson Scallop Fleet 2006-Present

Operation Manager / Owner F/V Provider III 2011-Present

Note: My responsibilities at Viking Village included fresh and frozen sales of seafood including; scallops, finfish and highly migratory species. All of our sales people are HACCP certified to ensure high quality standards and compliance of all seafood safety regulations. It is also my responsibility to inform the public on all aspects of the commercial fishing industry and have done so by developing a "Dock Tour" for the public that routinely serves thousands of people each season. I am partial owner and manager of the F/V, Kathy Ann, Elizabeth and Provider III. My duties include general maintenance of machinery, electronics and the hiring of all crew and captains. Included in my responsibilities are: adherence with all USCG Commercial Fishing Vessel Safety regulations; maintenance of appropriate equipment and communications according FCC

requirements. I am actively involved in monitoring all management for the Atlantic Scallop Fishery to assure strict compliance with regulations and routinely attend New England Fishery Management meetings. I currently sit on the New England Fisheries Management Council Scallop Advisory panel.