

# ADDITIONAL CORRESPONDENCE

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November 28, 2017

New England Fishery Management Council

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Thomas A. Nies, *Executive Director*



**NORTHEAST HOOK  
FISHERMAN'S ASSOCIATION**



**Subject: Framework Adjustment 57 Common Pool Trimester Total Allowable Catches (TACs)**

Dear Executive Director Tom Nies & Council Chairman Dr. John Quinn

We represent a small group of Commercial Fishermen with the Limited Access Handgear HA Permits, employing the use rod and reel, handlines or tub trawls to catch Cod, Haddock and Pollock along with small quantities of other regulated and non-regulated marine fish.

**We are requesting that the NEFMC adopt option 4.1.1.2.1.2 Option 2: Revised Common Pool Vessel Trimester Total Allowable Catch (TAC) Apportionments in FW 57 Alternatives Under Consideration and as shown below.**

**Table 8 - Common pool trimester catch by percentage (average) for FY 2012 – FY 2016.**

Stock	Trimester 1	Trimester 2	Trimester 3
GB Cod	28%	34%	38%
GOM Cod	49%	33%	18%
SNE/MA	21%	28%	51%
Yellowtail			
CC/GOM	57%	26%	17%
Yellowtail			
American	74%	8%	18%
Plaice			
Witch	55%	20%	25%
Flounder			

Framework Adjustment 57

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We support this change because it is based on the most recent five-year period of data available. Amendment 16 set the initial target TACs, or percentages of total TAC allocated to each trimester, for the common pool based regulatory changes and landings patterns that occurred prior to 2009. The common pool fishery has significantly changed since 2009.

Since the percentages allocated to each trimester has not changed since 2009, this has caused unnecessary closures of the common pool along with the common pool exceeding its trimester quotas for some species. Closing a trimester financially harms the common pool fishermen in addition to preventing these fishermen from harvesting healthy stocks. **Approving Option 2 will prevent unnecessary closures of the common pool fishery and allow the common pool fishermen to collectively harvest the groundfish allocated to this fishery.**

Respectfully,  
Marc Stettner /s/

NEHFA MEMBERS: Marc Stettner, Timothy Rider, AJ Orlando, Hilary Dombrowski, Paul Hoffman, Christopher DiPilato, Ed Snell, Scott Rice, Roger Bryson, Brian McDevitt, Anthony Gross, Doug Amorello

jc 11/30/17