

ADDITIONAL
CORRESPONDENCE

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**NORTHEAST HOOK
FISHERMAN'S ASSOCIATION**

September 21, 2017

New England Fishery Management Council

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Thomas A. Nies, *Executive Director*



Subject: **Evaluating 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 agree with the PDT recommendation that at this time Gulf of Maine (GOM) cod, Georges Bank cod, Cape Cod/GOM yellowtail flounder, Southern New England/Mid-Atlantic yellowtail flounder, American plaice, and witch flounder trimester TACs need to be adjusted to match the current fishery.

We support Option 2 Revised Common Pool Vessel Trimester Total Allowable Catch (TAC) Apportionments as shown on Groundfish Plan Development Team (PDT) dated September 14, 2017. Their calculation represents the average of the last five years fishing effort and shows the fishery has changed significantly since the implementation of Amendment 16. The new TACs should minimize or eliminate any seasonal closures in Trimesters 1 and 2. Although there is less quota in Trimester 3 this is the winter months with much less effort and any leftover quota from Trimesters 1 & 2 is moved into Trimester 3 per A16.

We do not support Option 1 because this retains the status quo where the percentages allocated to each trimester are not changed. Option 1 will continue to cause unnecessary closures of the common pool along with the common pool exceeding its trimester quotas for some species. These trimester closures financially harm the Common Pool fishermen in addition to preventing these fishermen from harvesting healthy stocks.

We are requesting that the NEFMC supports Option 2 in Framework Adjustment 57 (FW57) which takes action to adjust the percentages of total TAC allocated to each trimester based on the most recent five year period considering regulatory changes and recent landings patterns. These changes to the TACs will better align the current status of the stocks with the effort in each trimester to preventing unnecessary closures while allowing the common pool to harvest their allocation of each species.

Your consideration and action on our request would be greatly appreciated.

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

Amendment 16

Target (Trimester) TACs

For each stock, the total annual TAC will be apportioned to trimesters. Each trimester will be four months in duration. The trimesters will be divided as follows:

- 1st trimester: May 1-August 31
- 2nd trimester: September 1-December 31
- 3rd trimester: January 1-April 30

The target TACs, or percentages of total TAC allocated to each trimester, are shown in Table 27. The initial distribution was developed by the Council after taking into account the influence of regulatory changes on recent landings patterns. Subsequent calculations will use the most recent five year periods available when the calculations are performed. For other stocks, the distribution of landings has been heavily influenced by management measures and the distribution shown in the table represents a preferred distribution of landings.

The trimester TAC distribution for Atlantic wolffish was not included in the draft amendment and is added here since this stock was added to the management unit.

Table 27 – Initial apportionment of common pool TAC to trimesters

Stock	Trimester 1	Trimester 2	Trimester3
GOM Cod	27%	36%	37%
GB Cod	25%	37%	38%
GOM Haddock	27%	26%	47%
GB Haddock	27%	33%	40%
CC/GOM Yellowtail	35%	35%	30%
GB Yellowtail	19%	30%	52%
SNE/MA Yellowtail	21%	37%	42%
GOM Winter	37%	38%	25%
GB Winter	8%	24%	69%
SNE/MA Winter	36%	50%	14%
Witch Flounder	27%	31%	42%
Plaice	24%	36%	40%
Pollock	28%	35%	37%
Redfish	25%	31%	44%
White Hake	38%	31%	31%
N. Windowpane			
S. Windowpane			
Ocean Pout			
Halibut			
Atlantic wolffish	75%	13%	12%