

Correspondence

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**NORTHEAST HOOK
FISHERMAN'S ASSOCIATION**

March 22, 2015

New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116
Thomas A. Nies, *Executive Director*



Dear Tom Nies & Terry Alexander:

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 some species of groundfish. Historically and currently our fishermen account for a small percentage of the groundfish landed in New England. However, the monetary gains obtained by the participants in this fishery are very important to us.

We are requesting the GAP/Groundfish Committee and full NEFMC adopt the language contained in the PDT memo of March 18th 2015 concerning Amendment 18 as stated below:

Appendix I

PDT Suggestions for Alternate Language of Alternatives

**Section 4.2.1.2 Alternative 2: Establish a Fishery for Handgear A Permits
Carryover provision**

Up to 10% of unused HA sub-ACL would be able to be carried forward, provided that the total unused HA sub-ACL combined with sector sub-ACL carried forward for all sectors from the previous FY plus the total ACL does not exceed the ABC for the fishing year in which the carryover would be harvested (e.g., from FY 2015 to FY 2016). If the total exceeds the ABC, NMFS would adjust the maximum amount of unused carryover (down from 10%) to an amount equal to or less than the ABC of the following fishing year. The distribution in downward adjustment between sectors and the HA fishery would be proportional to the ACLs of these two subcomponents.

Rationale: This would create a carryover provision for the HA fishery and make it consistent with the carryover provision for sectors adopted through Framework 53, which was revised to be compliant with a 2014 ruling of the U.S. District Court for the District of Columbia. The ruling specified that a 'total potential catch' (the total ACL plus 10% unused ACE carryover) cannot exceed the ABC for any stock.

Section 4.2.4.2 Alternative 2: Sector Exemption from VMS Requirements

Under this alternative, vessels with a limited access Handgear A permit enrolled in a groundfish sector would be exempt from the requirement to use the Vessel Monitoring System while fishing on a sector trip (VMS). Vessels fishing with handgear in a sector must declare trips through the Interactive Voice Response (IVR) system.

Rationale: This alternative would allow the approach currently used for handgear vessels in the common pool to apply to those fishing in a sector. Vessels fishing with handgear in the common pool use the IVR system to declare a trip and then submit a Vessel Trip Report upon completion of a trip. There are costs associated with purchasing the VMS hardware, satellite connections, and data transmission, so this could be a lower-cost approach and may thus encourage participation in sectors by handgear vessels.

The NEFMC and the NMFS should be committed to doing what is necessary to maintain this fishery as they have done for other substance or small scale fisheries around the country.

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

If you are a holder of a groundfish HA permit and wish to join the NEHFA, please contact the NEHFA at the address above.