

The small mesh Area 1 whiting fishery has not worked well for fishermen this year despite, and in many cases because of, a super abundance of both silver and red hake. Why is this and how can the Council solve these issues?

The market for silver hake continues to decline because of a lack of processing capability and an ongoing decline of fresh fish purchasing of whole fish in America's big cities. This could be improved by the Council requesting NMFS to leverage the Dept. of Commerce for low interest loans for a whiting processing facility in the northeast and an ad campaign touting the taste and benefits of eating whiting as a substitute whitefish. This will not, however solve our short term issues.

For the past several years the southern New England squid fishery has closed just as the Area 1 whiting fishery has opened. This has forced those boats to switch to whiting and exacerbated a flooded market. A possible solution is to make the squid trimesters unequal TAC's so the fishery will not close until mid-August keeping the fleet diversified. The Council also should request NMFS contact the Department of Defense to see if they would be interested in some large whiting purchases during July and August to provide some floor to the market. This was done successfully with Pollack during the 1970's and 80's. The Council should also consider repealing the increase in the trip limit during July and August and not consider any further increase year round until the market stabilizes. The original proposal that was supported by industry was for the winter months only. The market simply cannot handle the extra fish in the summer when boats can fish seven days per week.

The Council should also eliminate the 500 pound restriction on transfer at sea. Bait currently has a higher value than whiting for food. Many lobstermen will buy it as a fresh bait substitute for herring. However, it does not salt well so larger bait dealers will only buy small amounts. The solution is to allow the boats to sell directly to other boats with all the usual caveats of obtaining a transfer at sea permit and not exceeding the mesh size trip limit.

Finally the red hake assessment issue has to be acknowledged and fixed. Red Hake are currently divided into two stocks for no scientific reason I can determine..."two stocks have been assumed...Sosebee 1998", Fishes of the Gulf of Maine, third edition. From a fishermen's perspective it is one population that shifts north and south based on water temperature. Waiting for a benchmark assessment to examine the issue is NOT a solution. Even the most skeptical scientist would have to acknowledge that a small number of vessels fishing very little time per day in a twelve square mile area, triggering an incidental catch limit in less than four weeks indicates a glaring discrepancy between the assessment and reality. The whiting PDT and the Council's SSC have the technical skills to examine the facts and consider making Red Hake one stock and combining the ACL's. Meanwhile, the trawl survey advisory committee should be tasked with examining the catchability of Red Hake on the Bigelow. Another year of making every seagull from Monomoy to Matinicus to fat to fly by 9AM is not a viable fishery management strategy.

All of the above mentioned solutions are measures to stabilize the fishery until limited access is implemented. Red Hake will always constrain the fishery whether it is one or two stocks. Fishermen in Area 1 are already using the raised footrope trawl which eliminates a substantial amount of red hake from the catch compared to traditional small mesh nets. Red and silver hake occur throughout the fishery. There is no time-area strategy to eliminate the interaction. Unfortunately, the only current strategy is to limit the number of participants. I hope the Council will continue to move expeditiously on the limited access amendment.

Sincerely,

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Submitted electronically