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# Additional Correspondence



91 FAIRVIEW AVE  
PORSTMOUTH NH 03801

**NORTHEAST HOOK  
FISHERMAN'S ASSOCIATION**

January 23, 2012

**New England Fishery Management Council**  
50 Water Street, Mill 2  
Newburyport, MA 01950  
Phone: (978) 465-0492  
Fax: (978) 465-3116



Dear NEFMC Council Members:

We represent a small group of Commercial Fishermen with the Limited Access Handgear HA Permits, employing the use Rod and Reel or Handlines to catch Cod, Haddock and Pollock along with small quantities of other regulated and non-regulated marine fish. Historically and currently our fishermen account for a very 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.

Our staple fish in the GOM is cod. With the pending very damaging restrictions that will be implemented for the 2012 fishing year for GOM cod we must be allowed to have access in statistical grids 132 & 133 to fish for haddock for the months of April and May. This area has very little cod in these months. The Ipswich Bay cod spawning grounds are protected where the GOM cod congregate. Without allowing access to harvest haddock, when they are plentiful, we will be severely economically harmed because of the loss of cod income for the rest of the season. Allowing us to access these ground (small inshore area) will help to mitigate the severe restrictions we face.

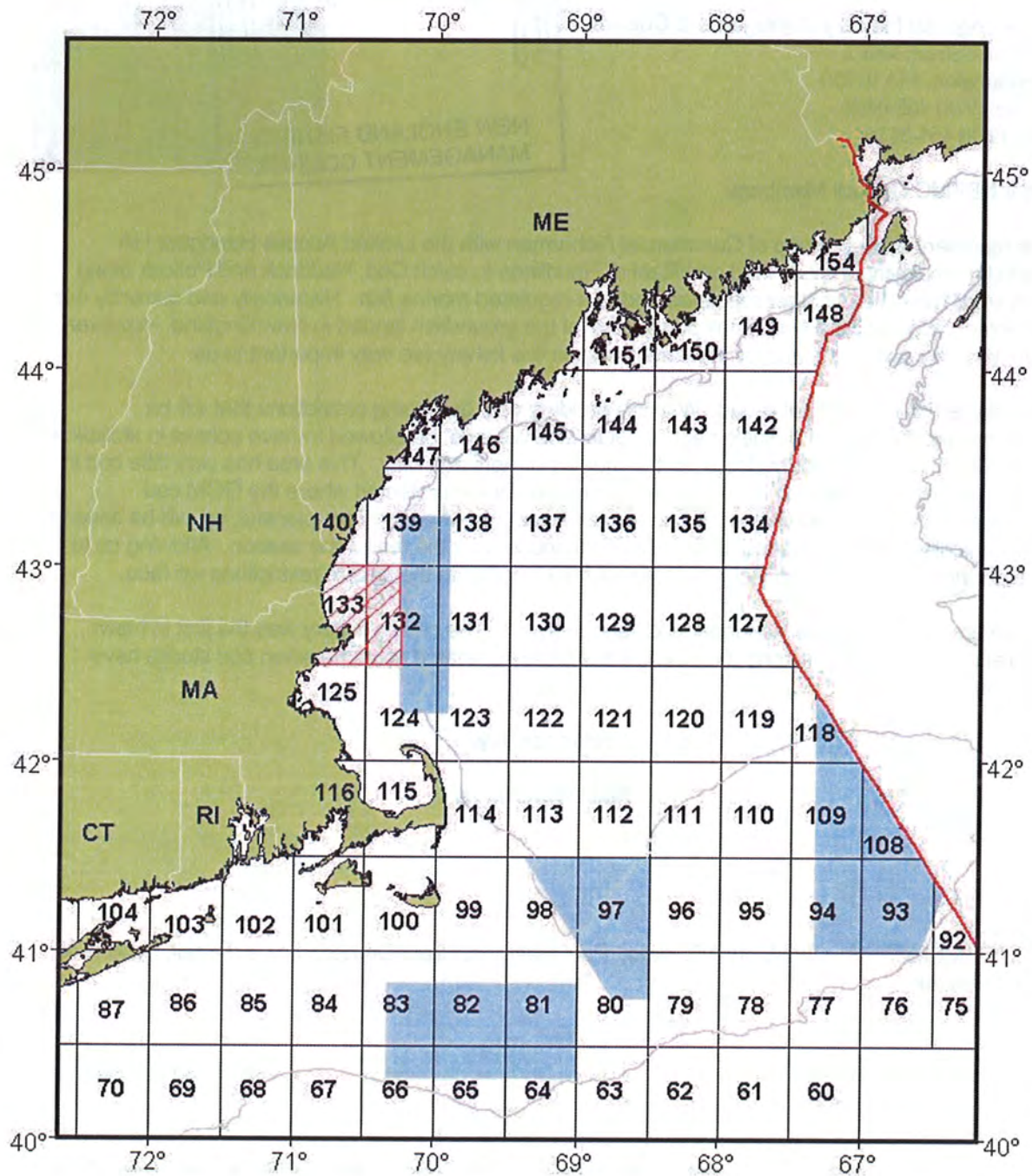
There are very few active Handgear cod fishermen left. The cod jig fishery was the first in New England and if nothing is done it will be the first to be eliminated at a time when cod stocks have rebound.

**Respectfully,**

**Marc Stettner /s/**

NEHFA MEMBERS: Christopher DiPilato, Paul Hoffman, Hilary Dombrowski, Ed Snell, Scott Rice, Marc Stettner

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





Please see my attached letter concerning the Gulf of Maine Cod Assessment. I have some additional questions as described below:

- What would be the outcome of the statistical evaluation of the status of the cod population if you were to use the former method of estimating the population? The outcome is important to understand if this is a new vs old statistical evaluation issue;
- Assuming a 100% mortality on discards is not reasonable;
- The trawler used for study has changed. My understanding is that the new vessel operated at a higher speed than the old vessel. Are there any other differences that could have impacted the outcome or results? This requires further discussion and evaluation; and
- There are many variables that may impact the presence or absence of cod or fish in a specific area. My understanding is that the trawler assessment is conducted in the same area every year. Unless the trawl cod assessment is conducted under similar conditions every year (time of year, water temperature, air temperature, pressure, wind direction, tide direction, tidal cycle, moon phase, salinity, CO<sub>2</sub>, O<sub>2</sub>, etc. before, during or after a storm) there could be good reason that the cod were not present in that area. Even under similar conditions you cannot guarantee similar results. This requires further discussion and evaluation.

Please include me in any future public emails or notices concerning this matter. I look forward to hearing from you or other representatives from your office concerning this matter.

Thank You.

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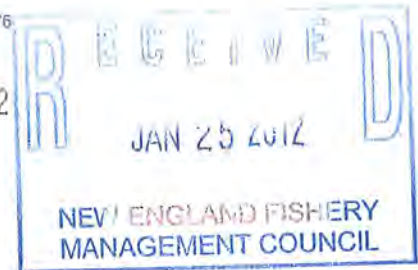
Capt. Mike Pierdinock  
CPF Charters  
P.O. Box 732  
Brant Rock , MA 02020





UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
NORTHEAST REGION  
55 Great Republic Drive  
Gloucester, MA 01930-2276

JAN 25 2012



C.M. "Rip" Cunningham, Jr., Chair  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

Dear Rip:

In October 2011, NOAA Administrator Dr. Jane Lubchenco announced that we will continue to fund the cost of at-sea monitoring (ASM) for the Northeast (NE) multispecies sector and common pool fishery through April 30, 2013, the end of fishing year (FY) 2012.

NE multispecies sectors and interested parties were previously notified in September 2011 that sectors would be required to propose, fund, and implement an ASM program, with a required universal coverage level of 17 percent of trips. Instead, based on Dr. Lubchenco's announcement, starting May 1, 2012, we intend to fund the ASM program at a 17-percent coverage level for both sector and common pool vessels, although this coverage level, as always, will be dependent on final fiscal year 2012 budget allocations. In combination with the existing Northeast Fisheries Observer Program (NEFOP) coverage, we expect to provide a total of 25-percent coverage of all NE multispecies fishing trips for FY 2012. We have initiated the process to contract directly with ASM providers for FY 2012, as we have done in the past.

Sector and common pool vessels will continue to use the Pre-Trip Notification System, providing NMFS with 48 hours' notice of an upcoming trip for the assignment of either a NEFOP Observer or an ASM monitor. FY 2012 sampling protocols for monitors will remain similar to FY 2010 and 2011. We will continue to fund and hold training and refresher courses for observers and monitors, as needed. NMFS will process the data and make those available to sector managers, industry members, authorized data users, and others interested in data summaries.

For NEFOP and ASM program management, contact Amy Van Atten at 508-495-2266, and for coverage level determination and sector-related regulatory information, contact Allison Murphy at 978-281-9122.

Sincerely,

Daniel S. Morris  
Acting Regional Administrator

cc: Sector Managers









# National Association of Charterboat Operators

P.O. Box 2990 Orange Beach, AL 36561

Phone (251-981-5136) Fax (251-981-8191)

E-Mail: [info@nacocharTERS.org](mailto:info@nacocharTERS.org) Web: [www.nacocharTERS.org](http://www.nacocharTERS.org)

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Beach Haven Charter Fishing Association  
Cape Cod Charter Boat Association  
Captree Boatman Open & Charter Boats  
Charterboat Association of Puget Sound  
Chicago Sportfishing Association  
Coastal Bend Guides Association  
Deep Creek Charterboat Association  
Destin Charterboat Association  
Eastern Lake Erie Charter Boat Assoc.  
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Maryland Charterboat Association  
Michigan City Charter Boat Association  
Mississippi Charterboat Captains Assoc.  
Northeast Charterboat Captains Assoc.  
Northern Neck Charter Captains  
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Seward Charterboat Association  
Sitka (AK) Charter Boat Operators Assoc.  
United Boatmen of New Jersey  
Virginia Charter Boat Association  
Waukegan Charter Boat Association  
Westport Charterboat Association

January 25, 2012

Sent Via Fax: (978) 465-3116

Chairman C.M. "Rip" Cunningham, Jr.  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

Re: Recent Gulf of Maine Cod Assessment and Potential Council Actions

Dear Mr. Cunningham :

NACO is a National Association of Charter Boat Owners and Operators that was created in 1991. We represent over 3,000 individuals all across the United States, our membership includes marine charters who provide fishing, sailing, diving, eco-tours, and other excursion vessels that carry passengers for hire. We are the premiere Association that represents professional charter boat interests in our country.

I am writing this on behalf of the NACO members who live and fish in the Northeast. I have addressed this to all of you because each of you play a critical role in the management of their fishery resources and the fishermen. We have been provided information that indicates there is much controversy in the recent cod stock assessments. Apparently the 2008 assessment provides a completely different picture than the most recent assessment even though harvest levels have been within recommendations.

There is also serious concern over the data from the recreational sector that shows harvest levels that are not believed by the anglers who spend their time on the water. The new MRIP system report was provided today and that report shows a significant difference of harvest in 2010 between MRIP and MRFSS data, MRIP 48% less. In addition some of your NEFMC SSC and Council members have serious concerns over this last assessment and the vessels and techniques used to sample the stock.

Based on the information we have been provided and on the serious concerns of many of our members as to how a partial or total closure will affect their jobs, families, and communities, we strongly request that no management changes be implemented until the science and other data are reconsidered and more reliability placed on the assessment. Your management decisions not only affect the resource but also affect the people, their families, and their communities. While all science is never perfect, certainly you can review what you have and try to gain a better picture of the status of this stock. A question has been asked how the most recent stock assessment can be so different than the last when fishermen do not see such a drastic change. Clearly, any reasonable manager would want to know the answer before putting people out of work, causing a child to do without a new pair of shoes, and causing local communities to suffer more harm in these difficult economic times.

We look forward to hearing from you with a positive report that no management measures will be changed until a complete review of the data has been done.

Sincerely,

*Robert F. Zales, II*

Capt. Robert F. Zales, II  
President

Cc:file



*cc: fn, ah*

