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**NORTHEAST HOOK
FISHERMAN'S ASSOCIATION**

January 9, 2012

New England Fishery Management Council

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Dear NEFMC Council Members:

We represent a group of Commercial Fishermen with the Limited Access Handgear HA Permits, employing the use Rod and Reel or Hand lines to catch Cod, Haddock and Pollock along with small quantities of other regulated and non-regulated marine fish.

We are extremely concerned with the latest stock assessment conducted on GOM cod. We believe that the assessment failed to consider the best available science with regard to tagging studies and the latest information pertaining to stock boundaries. The problem is the eastern GOM cod & Eastern Georges bank stocks are not rebuilding while the western GOM and Western Georges bank stock is. Until a new stock assessment can be conducted to consider the most recent scientific research on GOM cod, the GOM cod ACL for the 2012 fishing year should remain fixed at the same level as 2011.

Below is some of the most recent work on GOM cod that was not considered in the latest stock assessment.

1. ***Exploring Fine-scale Ecology for Groundfish in the Gulf of Maine and Georges Bank, Genetic Insights into the Stock Structure of Atlantic Cod in US Waters, Adrienne Kovach***

http://www.gmri.org/community/seastate/Kovach_Adrienne/Kovach_Adrienne_Abstract.pdf

"The current management models are typically based on the "old dogma" of panmictic populations, and do not consider fine-scale population structure. Stocks encompass large geographic regions with multiple oceanographic features and may be comprised of individuals with potentially different life history histories. As such, their boundaries may not have a biological basis. This may be true for cod in U.S. waters, which are currently managed according to a two stock model, consisting of (1) a Gulf of Maine stock and (2) a stock comprised of Georges Bank and areas southward, from southern New England to the mid-Atlantic coast. Evidence inconsistent with the current management model includes movement data from recent tagging studies (Tallack and Whitford 2008) and genetic data (Lage et al. 2004, Wirgin et al. 2007). "

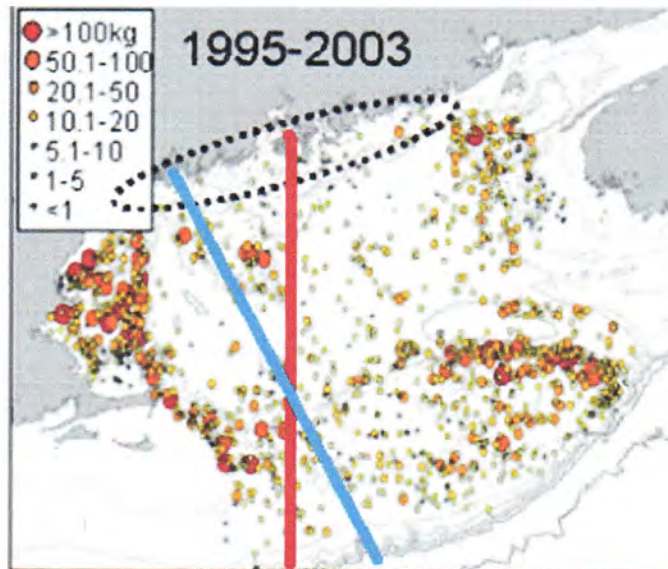
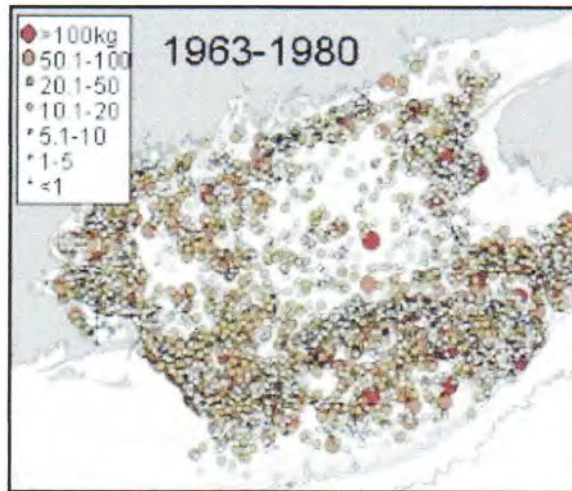
In conclusion, we found strong evidence for population genetic structure that is not consistent with the 2-stock management model. Cod in US waters are broadly structured into 3 groups: 1) a northern spring spawning coastal complex in the GOM, 2) a southern complex consisting of winter-spawning inshore GOM, offshore GOM and sites south of Cape Cod, and 3) a Georges Bank population....

2. **"Workshop on Reconciling Spatial Scales and Stock Structures for Fisheries Science and Management" 2011**

NEW COD STOCKS DEFINED BY WGOM AND EGOM

WGOM WEST OF BLUE OR RED LINE*

EGOM EAST OF BLUE OR RED LINE*



*Exact boundaries (maybe 3) derived by best available science to include tagging studies, genetics, etc.

There will be no longer a commercial cod jig fishery in the GOM if no action is taken. The cod jig fishery was the first in New England and if nothing is done it will be the first to be eliminated if the cuts proposed are made to the GOM cod stocks.

Respectfully,

Marc Stettner

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