

**Stellwagen Bank Charter Boat Association
P.O. Box 1230
Marshfield, MA 02050**



John Bullard, Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

March 15, 2016

“Comments On Groundfish Recreational Fishing Measures”

Dear Mr. Bullard:

I am writing to you on behalf of the Stellwagen Bank Charter Boat Association membership in regards to the proposed recreational measures on Gulf of Maine haddock and cod (Docket #NOAA-NMFS -2016-001) . Our association supports the proposed bag limit of fifteen haddock per person on both a private and charter/party boats with a minimum size of 17” which will help reduce dead discards.

We are very disappointed in the proposed GOM cod bag limits and seasonal closures, allowing only a single fish per person from August 1st through September 30th with a minimum size of 24” and certainly do not support these bag limits and months allowed.

Last season there were many reports of anglers catching small to large market cod while targeting other species. The past several years, there has been excellent cod fishing in the southeast New England area off of Block Island and south of Long Island, NY.

These observations came from not only fisherman from all over but also by you. Last summer you spent 48 hours fishing with Captain Terry Alexander on board the F/V Jocka on August 26th, 2015 and were able to see with your own eyes what captains have been reporting. After your trip you posted a wonderful story about the magnificent fishing on the GARFO website at

http://www.greateratlantic.fisheries.noaa.gov/stories/2015/september/28_48_hours_commercial_fishing.html

In the article you quoted “Terry wanted to show me that there are cod out there. He did his first tow in 45 minutes and put 1,000 pounds of cod on my shoes” says Bullard.” The whole net was full of cod. Just cod. Big Cod.”

Since you have been the Regional Administrator you have received hundreds of letters and comments regarding the impacts of small bag limits and long seasonal closures on the charter/head boat industry. Yes the fifteen haddock will offer some relief, however the majority of charter boat customers want to fish for cod. Two years ago, one charter boat out of Green Harbor, MA during May 2014 had every day booked except for three. Last year during 2015 with the horrific bag limits imposed, the same captain with a reputation of catching fish, only had three days booked during the same month which is a substantial loss of business for anyone to overcome. Most charter boats have large expenses like the commercial fleet with dockage from \$150 to \$200 per foot, insurance, maintenance, advertising costs and a large monthly boat payment. Unlike a smaller commercial fisherman, we own no quota and have no fish to lease to receive some income. Ours is all based on taking customers fishing and without a reasonable bag limit on cod most will fail.

The charter boat industry has worked in the past and offered their boats for tagging programs, received presentations from researchers on dead discards and migration patterns of large breeding cod. We want to be part of the solution and do anything to once again have back the exciting fishing we had prior to catch shares. Anglers were going home extremely happy and commercial boats fishing under DAS were making money.

We applaud you and the NEFMC for the proposed increase in the GOM haddock and all we are asking for right now is a bag limit of at least five cod which will help attract customers for a ten to twelve hour day of offshore ground fishing. Please take into account, the bag limit is only a number which attracts customers and once in a while is reached, and not on every trip which some believe.

If you have any questions please feel free to contact me anytime at captdave@relentlesscharters.com

Sincerely,

David Waldrip
Pres, Stellwagen Bank Charter Boat Assoc

Copy: Dr. David Pierce, Director, Massachusetts Division of Marine Fisheries,
Mr. Mark Grant, GARFO, Regional Coordinator for Recreational Fisheries
Mr. Barry Gibson, Chairman, NEFMC, Recreational Advisory Panel