

10

Mr. Tom Nies
New England Fisheries Management Council
50 Water Street
Newburyport, MA 01950



Dear Mr. Nies:

I am writing to you as an owner and operator of a charter boat fishing out of Green Harbor, MA regarding the proposed habitat protection measures that have been drafted and are being considered by the New England Fisheries Management Council. I strongly oppose any changes to the Western Gulf of Maine closed area and strongly support Alternative 1, No Action.

Additional closed areas for the charter/party and recreational angler will create an adverse effect on a sector that is already operating under rules with strict bag limits, minimum size limits, a hard TAC and a five and a half month closed season on GOM cod. If the SERA II is put into place the charter/party boats fishing out of the South Shore of Massachusetts will be forced to transit greater distances up to 40 NM to locate cod and haddock for anglers to take home for dinner. Currently we are already fishing over 28 NM from our homeport and the additional distances we are now running has resulted in a loss of customers who can fish out of other ports with less time transiting. The SERA II will result in a major disadvantage to the charter party fleet from our area. We have already lost a major number of cod charters to the boats fishing out of Rhode Island and New York in the winter while we are tied to the dock.

I also have major concerns this will affect our tuna and shark charters as we often fish for ground fish while drifting to allow customers a chance to go home with a few cod and haddock. There will also be new regulations regarding to enforcement. I presume boats would be required to remove all bait and hooks from fishing rods and have all fish on board gutted and stowed when transiting from outside of the area (similar to the seasonal closure on Whale Back). This will create additional hardships for boats fishing to the northeast which need to transit through this area on the way back to homeport.

It is my understanding the Vessel Trip Reports (VTR) data used to determine where the SERA would take place was from over three years ago

when the cod stock was healthier and boats were able to locate fish on Stellwagen Bank on the shoal water (15-25 fathom). Since going to catch shares where a concentration of large draggers fishing 24/7 on the bank in the winter and spring, the charter/party and recreational anglers have been forced to fish east of the bank (WGOM) in order to locate cod and haddock. An analysis of the past two years of VTR data would clearly indicate this change in fishing locations.

The recreational angler has little impact on the bottom using weights, cod jigs and hook and line to harvest fish for personal consumption. Creating a SERA and shutting out the recreational angler will have no benefit to the protection of juvenile cod compared to the massive amount of juvenile fish eaten daily by spiny dog fish and seals in the area. Any changes other than Status Quo, Alternative 1, No Action will virtually be the end of the charter/party industry from the South Shore of Massachusetts which fish Stellwagen Bank. It will also be a domino effect resulting in a loss of revenue to the local hotels, tackle shops, marinas, boat dealers etc. in the local area. If you have any questions please feel free to contact me anytime.

Respectfully,

David Waldrip
Charter Boat Relentless, Green Harbor, MA
captdave@relentlesscharters.com

Copy: Mr. John Bullard, Administrator, NMFS, NERO
Mr. RIP Cunningham, Chairman NEFMC
Mr. Barry Gibson, Chairman, Recreational Advisory Panel
Mr. Stephen James, President, Stellwagen Bank Charter Boat Assoc
Mr. Paul Diodati, Director, Massachusetts Division of Marine Fisheries
Dr. David Pierce, Massachusetts Division of Marine Fisheries
Mr. Dave Preble, New England Fisheries Management Council