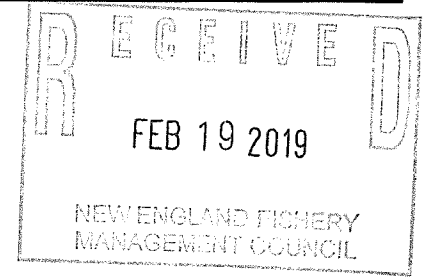


#6

CORRESPONDENCE

Sherie Goutier

From: Bruce Sweet <bsweet60@comcast.net>
Sent: Tuesday, February 19, 2019 8:41 AM
To: comments
Subject: comments on groundfish management actions



Dr. John Quinn and Mr. Director Tom Nies,

I am a charter boat operator out of Gloucester MA. As you know the zero cod possession and reduced haddock bag limits for GOM have been devastating to our charter fishing operations. Cod is essential for my customers from PA and NY to come to Gloucester. I know for fact numbers of them are traveling to RI for winter fishing instead or not at all. I am encouraged to see many of the action options do include the start of cod coming back to our catches. I still think the angling effort is overstated based on my on the water observations. As written, I find option 6 the most favorable but I would strongly request that any cod possession be moved to May through July not the late summer or fall months. Most of my customers want to come for groundfish in May and June when they are plentiful in shallow water and no dog fish are present. Further we have Striped bass and Tuna to fish for in the late summer and fall.

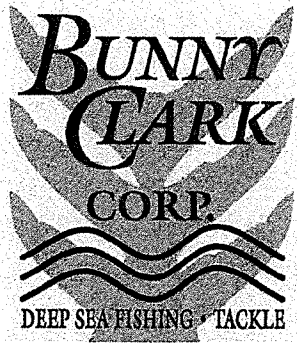
Thank you for your consideration.

Capt Bruce Sweet

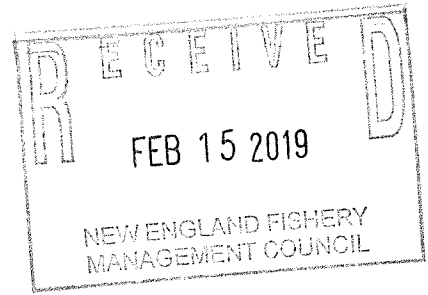
Sweet Dream Sport Fishing

Gloucester MA

jc 2/20/19



William R. Tower, III (Tim), President
P.O. Box 837
93 Frazier Pasture Road
Ogunquit, Maine 03907-0837
207-646-2214
F/V Bunny Clark
F/V Petrel
Fishing Tackle



February 15, 2019

Tom Neis
Executive Director
New England Fishery Management Council
50 Water St.
Newburyport, MA 01950

RE: RAP meeting on February 22, 2019 & adjusting recreational fishing regulations for fiscal fishing year 2019.

Dear Mr. Neis:

I will not be able to attend the upcoming RAP meeting on February 22, 2019. In lieu of this, I would like to present my comments to you based on attending the PDT meeting via Webinar on February 13, 2019.

I have reviewed the models/options that were presented by Scott Steinback during the PDT meeting, understand that they will be presented to the RAP and feel that another option should be reviewed. After talking to Scott I found that this option had already been run as a model but had not been presented. The specifics of the model are thus: minimum size limit on haddock of 17", a 15 haddock bag limit, a haddock season extending from April 15 until March 1 (removal of the fall haddock closure), a cod season with a one cod bag limit during September & October with a cod minimum size of 21" inches. I would ask that this be a proposal for another option available for the RAP to consider.

I have a strong feeling, based on my experiences in the fishery and from the many meetings I have attended over the years, that the uncertainty of getting these models to produce what we want them to produce is very high. We are using a cod sub-ACL of 220 metric tons (mt) for the recreational sector. The model that is probably the most desirable for the recreational fleet is number 6 which gives us a cod mortality rate of 145 mt. Knowing that in four of the six option review years, these models showed a higher mortality rate for cod than expected, I am afraid that 145 mt will bring us too close to our limit for any of us to feel comfortable moving forward.

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JC 2/20/19



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-2-

If you also take into account that participation in the fishery by recreational anglers was well down in the GOM in 2018, as compared to other years, that new regulations could spur increased involvement in the fishery in 2019 and that the new means of data collection for MRIP (coming available) might show that we are actually taking more cod than was previously thought, there is good reason for a more conservative approach when applying new regulations to the recreational fishery.

My seventh option proposal, mentioned above, has already been vetted by the Steinback/Lee team. And, if I understood correctly, gives us a mortality rate of 121 mt in respect to cod. This, I feel, is close to what we want to achieve for 2019. Our ultimate goal here should be regulation stability in the recreational fishery. In a perfect world we would have the same regulations for five years at a time with a review before the end. I know this can't be achieved at the present time. But to move toward this goal we need to have regulations that are more responsible now. And as much as I would love to see a cod season as described above, I wouldn't be opposed to having a more limited cod season if we could be assured of having an open haddock season as described above. For 2019, I think that this "option 7" will get us where we want to go and be conservative enough to apply.

Thank you very much for considering this proposal.

Sincerely,

William R. Tower, III (Tim)

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Greater Atlantic Region Bulletin

NOAA Fisheries, Greater Atlantic Regional Fisheries Office, 55 Great Republic Drive, Gloucester, MA 01930

For Information Contact:
Sustainable Fisheries Division
(978) 281 – 9315

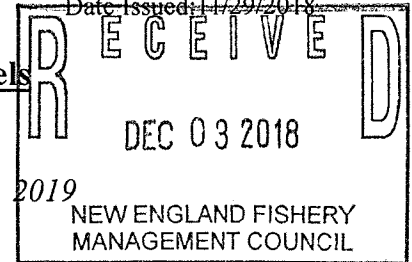
www.greateratlantic.fisheries.noaa.gov

Date Issued: 11/29/2018

Northeast Multispecies Common Pool Vessels

Possession and Trip Limit Increase
for Georges Bank Cod

Effective Date: November 29, 2018, through April 30, 2019



Effective at 0845 hours on November 29, 2018, the possession and trip limits for Georges Bank (GB) cod are adjusted, as summarized in the table below, for the remainder of the 2018 fishing year, through April 30, 2019.

Permit Type	Current Possession/Trip Limits	New Possession/Trip Limits
Day-At-Sea (DAS)	100 lb/DAS, up to 200 lb/trip (Outside of the Eastern U.S./Canada Area)	250 lb/DAS, up to 500 lb/trip
	100 lb/DAS, up to 500 lb/trip (Inside the Eastern U.S./Canada Area)	
	1,000 lb per trip [Closed Area II Yellowtail Flounder/Haddock SAP (for targeting haddock)]	500 lb per trip
Handgear A	100 lb/trip	250 lb/trip
Handgear B	25 lb/trip	unchanged
Small Vessel Category*	100 lb/trip	250 lb/trip

*The Small Vessel Category trip limit of 300 lb of cod, yellowtail flounder, and haddock combined remains in place.

If you are not participating in a Special Access Program (SAP), have declared your trip through the vessel monitoring system (VMS) or interactive voice response (IVR) system, and have crossed the VMS demarcation line prior to 0845 hours on November 29, 2018, you may land up to new possession and trip limits for that trip.

If you are participating in the Closed Area II Haddock SAP, have declared your trip through VMS or the IVR system, and have crossed the VMS demarcation line prior to 0845 hours on November 29, 2018, you are not subject to the new possession and trip limits for that trip.

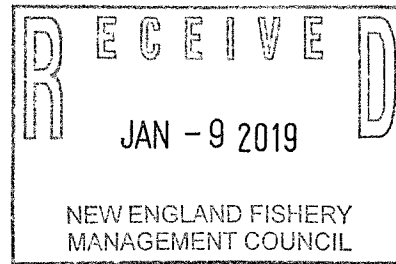
For small entity compliance guides, this bulletin complies with section 212 of the Small Business Regulatory Enforcement and Fairness Act of 1996. This notice is authorized by the Regional Administrator of the National Marine Fisheries Service, Greater Atlantic Region.

jc 12/10/18

Please note that the GB cod trip limit for vessels participating in the Closed Area II Haddock SAP has been reduced to 500 lb per trip to make it consistent with the trip limit when not participating in a SAP. This reduction in the trip limits for vessels participating in the SAP is expected to prevent an overage of the common pool's annual quota allocation.

<i>Frequently Asked Questions</i>	
Why is this action being taken?	We are increasing the possession and trip limits to provide additional fishing opportunities and facilitate harvest of the quota for GB cod.
How much of the quota has been caught?	As of October 13, 2018, only 11 percent of the GB cod annual quota has been caught. <u>Quota monitoring</u> reports are updated on the internet.
What happens if the Trimester TAC is exceeded? Underharvested?	If the Trimester 1 or Trimester 2 TAC for a stock is exceeded, the overage is deducted from the Trimester 3 TAC. Any unused portion of the Trimester 1 or Trimester 2 TAC for the stock is carried forward to the following trimester. No unused portion of the total annual quota may be carried over to the following fishing year.
What happens if the annual quota is exceeded?	If the 2018 fishing year quota is exceeded, the amount of the overage will be deducted from the common pool's quota for fishing year 2019.

NEFMC
Attn. Dr. John Quinn and Mr. Tom Nies
50 Water St.
Newburyport, MA 01950



January 4, 2019

Kevin M. Scola
P.O. Box 1392
Marshfield, MA 02050

RE. Comment on recreational limits

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Dear Mr. Chairman

I would like at this time to make a proposal that the catch limits for 2019 recreational measures concerning Gulf of Maine Cod & Haddock and Georges Banks Cod & Haddock be exactly the same for both geographical areas and user groups including but not limited to Charter boats & Head boats.

I strongly believe that this is the correct course of action given the strong scientific evidence that both of these stocks intermix at a much higher level than originally thought.

This is the only real responsible & correct course of action to take given the astronomical high level of fishing effort on the Georges Bank's stock in the recreational sector and the historical low-level of effort on the Gulf of Maine stock.

To allow one user group access to a stock that has basically collapsed & intermixes with another stock that has basically collapsed as well is irresponsible at best and leads to speculation of special interests being taken care of and corruption .

It only makes sense to have uniform regulations for both user groups if both of these stocks are indeed at very low historical levels as suggested and the mortality rate is astronomically high to the point where it basically accounts for 250 metric tons .

Whatever the catch rate is for the user group that fishes on Georges Bank stock is then it should be the same for Gulf of Maine stock user groups and vice versa..

It's about time we take hard measures in order to help the stock to rebuild in a timelier manner.

Yours truly

A handwritten signature in cursive script that reads "Kevin M. Scola".

Capt. Kevin M. Scola

Bluewater Charters
Survival fishing company

