



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

New England Fisheries Management Council  
50 Water Street  
Newburyport, MA  
01950

October 23, 2018

**“Comments on Recreational Measures for Gulf of Maine cod and Haddock”**

Dear Dr. Quinn,

I am writing to you on behalf of the Stellwagen Bank Charter Boat Association with over one hundred and fifty members consisting of both charter boat captains and recreational anglers. I want to let you know we are very concerned regarding what the recreational measures for Gulf of Maine cod and haddock during the 2019 fishing year even though nothing has been proposed.

A reminder of what the recreational bag limits for Gulf of Maine cod and haddock have been since 2010 are outlined in the table below.

**Bag Limits on GOM Cod and Haddock from 2010 – 2018**

Year	Bag Limit GOM Cod	Bag Limit GOM Haddock
2010	10	No Bag Limit
2011	10	No Bag Limit
2012	9	No Bag Limit
2013	9	No Bag Limit
2014	9	3
2015	0	3
2016	1 Aug/Sep	15
2017	0	12
2018	0	12

**Note: This does not include the closed seasons which include zero possession of GOM Haddock from 17 September – October 1<sup>st</sup> and 1 March – 14 Apr**

Looking at the historical bag limits since 2014, the regulations have had a dramatic impact for anyone who recreationally fishes for cod and haddock in the GOM. It was bad enough going from no bag limit on haddock during 2013 followed by a three fish limit during 2014 thinking it could not get worse. Well we were wrong and during 2015 were handed a zero possession of cod and a three haddock forcing many recreational anglers to quit fishing offshore and also many charter and party boats out of business. During 2016 the haddock bag limit was raised to fifteen fish per person and during the last two years reduced to twelve due to the fear we would catch too many GOM cod and exceed the ACL due to dead discards. This included not allowing the recreational sector to harvest approximately the 2100 extra metric tons of GOM Haddock ACL.

Since 2015 recreational anglers have had virtually zero possession of GOM cod with the exception of 01 fish per person during Aug/Sep 2016 when there is little effort. I would imagine you are also hearing what anglers are telling us, they are observing lots of codfish in the Gulf of Maine. Pictures are being posted on social media of large market cod being caught and released while fishing for haddock or tuna from Maine to Stellwagen Bank. A dragger from the North Shore posted photos on Facebook of 2,000 lbs. of beautiful market size cod caught on a twenty minute tow and later repeated this a few days later at another location.

While private anglers in the GOM and charter/party boats have a zero possession limit on cod, boats fishing south of 42 degrees north are landing ten fish limits of cod. They are filling not only totes with fish, but also boats with charters. Why would a recreational angler desire to charter a boat in the GOM when they can fish south to Cape Cod and land ten cod and have no bag limit on haddock? Numerous studies have proven these two stocks mix and move between the Gulf of Maine and Southern New England, Georges Bank locations.

Green Harbor, MA located in Marshfield used to have 15-20 boats taking out charters each weekend from March through June. It was historically known as the place to go to book a charter to fish Stellwagen Bank for cod and haddock. Today after closed seasons, zero cod possession, bag limits as low as only 3 haddock, many charter boat businesses have folded due to being unable to attract customers. With the current day situation the fleet is now reduced to just a handful of charter boats. Many private boats won't even leave the dock, claiming it is not worth the fuel to fish offshore with the current regulations.

The vessels running charters especially on six pack boats are currently struggling at the present time with zero possession of cod, haddock closed and now commercial Giant Bluefin Tuna shut down they are tied to the dock especially with no tautog or other southern species available.

We are asking the Recreational Advisory Panel, Groundfish Advisory Panel, Groundfish, Committee, New England Fisheries Management Council and Greater Atlantic Regional Fisheries Office (GARFO) to understand the economic loss and impact these regulations have caused, not only for the for hire sector but also the impact to marinas, tackle shops etc.

If we were not seeing cod we could certainly understand further restrictions, but boats are catching cod and seeing plenty of fish on the bottom. At a minimum the NEFMC should provide the recreational angler a reasonable bag limit of cod and eliminate the fall closure of haddock in the GOM. We remain frustrated hearing the same information each year at the RAP of exceeding the ACL based on bad MRIP data and other surveys.

Finally, we respectfully request the Recreational Advisory Panel report directly to the NEFMC and not the Groundfish Advisory Panel as there are many issues pertaining to recreational fisheries which are not groundfish related. These include everything from ASFMC managed species such as striped bass, black sea bass, summer flounder and HMS species. How can the groundfish committee have time to address other concerns of the recreational sector?

I want to thank you for your time and allowing us to comment on this matter. I am sure as we have additional meetings and proposals we will continue to make comments. If you have any questions please contact me anytime.

Sincerely,

David Waldrip  
Stellwagen Bank Charter Boat Association

cc: Tom, Nies, Executive Director, NEFMC  
Michael Pentony, Administrator (GARFO)  
Terry Stockwell, Vice Chairman, NEFMC  
Barry Gibson, Recreational Fishing Alliance, New England Representative  
Michael Pierdinock, Recreational Fishing Alliance, MA Representative  
Frank Blount, NEFMC, RAP Chairman  
Dr. David Pierce, Director MA Department of Marine Fisheries

