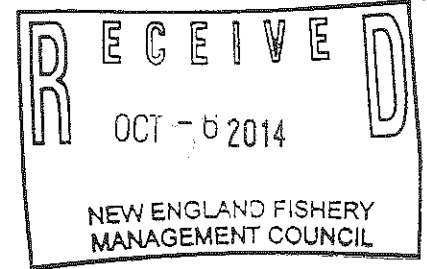


#5

MISS SHAUNA LLC
1 CAPE ST
NEW BEDFORD, MA 02740
TELEPHONE: 508-993-9505



New England Fisheries Management Council
50 Water St
Mill 2
Newburyport MA 01950
Attn: Mary Beth Tooley

Dear Ms. Tooley:

October 2, 2014

I am writing this letter in order to bring to your attention a problem I have regarding the new turtle dredge regulations. To the best of my knowledge I am the only one in the limited access scallop fleet that has this problem.

I am the owner of the F/V Miss Shauna a full – time two dredge scallop boat. The vessel is 51' in length, 20' in breadth and has a horsepower rating of about 325. The problem I have is the vessel is too small in size and horsepower to adequately and safely use the turtle dredges.

The boat's permit is based on the history of the original vessel when the "10/10/20" rule took effect. That rule effectively limited upgrades to a vessel's length, tonnage and horsepower which is perfectly acceptable, however, that rule was also based on the use of the "New Bedford" style dredge.

Miss Shauna is able to operate effectively and safely while using the "New Bedford" style dredge, but is unable to use the new turtle dredge in a safe or efficient manner. As I have mentioned above the breadth of the boat is documented at 20' at its widest point at midship, but that is the exterior width of the boat; the interior width of the boat is smaller. Deducting approximately 6" for each side rail leaves a deck width of approximately 228", deducting another 8" for the strongback in the center of the deck would leave 220" of total deck width leaving 110" per side. The scallop drags when placed on a boat are placed lengthwise across the width of the boat. A typical "New Bedford" style drag is approximately 62", without the bag, which would allow room to swing a drag on board and safely store it on deck. With the current turtle dredge design, the overall length of the dredge is approximately 96" not including the bag. Due to the fact that the Miss Shauna is such a small vessel we had the turtle dredges built at less than 10.5' so we can eliminate the "bump out" on the turtle dredge, saving us 12" per drag. However, this was still not enough of a reduction in length to fit our deck. Whenever

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we attempted to dump out a turtle drag on the boat it would have a tendency to get stuck between the strongback and the side rail which creates very dangerous conditions while at sea.

Another aspect of the new turtle drags is they have a tendency to tow much harder than a typical "New Bedford" style drag. In fact, two 8' turtle dredges bring the boat to a complete stop, much like an anchor. Again, due to the "10/10/20" rule we are unable to increase horsepower to compensate for the increase in drag resistance.

Miss Shauna is only 51' in length which in essence means it's a mild weather, summer time fishing boat. We normally start fishing sometime in April, weather permitting, and we try to finish in August. The turtle dredge season starts May 1 and ends October 31 which encompasses our entire fishing year. While the regulation requires the turtle dredges in areas west of 71 degrees, or the Mid Atlantic areas, it is not required for areas east of 71 degrees, or the George's Bank area. The problem that arises when there is no harvestable scallops in the George's Bank area we are effectively shut out of the Mid Atlantic area which encompass approximately half the scallop biomass.

I believe I have the only full time two drag permit that is affected by the turtle dredge regulation. There may be full time one drag permits that have similar length and horsepower restrictions, but they have the ability to move their strongback across the deck allowing plenty of deck area for the drag. With two drags I don't have that option.

While debating the merits of the turtle drag the New England Fishery Management Council created an exemption for the general category scallop vessels for the same reasons I have outlined in this letter, therefore, I would like to formally ask the New England Fishery Management Council to grant me an exemption from the turtle dredge requirements, which would put me back on a level playing field with the rest of the limited access fishery and correct the unintended consequences of the turtle dredge requirements have on me.

If you have any questions or require additional information please feel free to contact me.

Sincerely,

Paul Weckesser