Stellwagen Bank Charter Boat Association
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January 26, 2004

Chair Tierney and Members of the Task Force

RE: Comments of Stellwagen Bank Charterboat Association and Northeast Charter Captains Association on OMTF draft Recommendations

On behalf of the Stellwagen Bank Charterboat Association (SBCBA) and the Northeast Charter Captains Association (NECCA), we thank you for the opportunity to comment and hope you will give our concerns serious consideration.

Stellwagen Bank Charterboat Association represents about 60 members mostly from the Southshore of Massachusetts and we carry more than 10,000 clients per year, mostly out of state fishermen.

Northeast Charter Captains Association represents more than 90 members mostly from the Northshore of Massachusetts and they carry over 5,000 clients per year.

According to Paul Diadoti, director of Massachusetts Division of Marine Fisheries, there were 472 charterboats, 37 party boats and 13 registered guides licensed to operate within Massachusetts in 2003 and the number is increasing.

We are gravely concerned by the implications of much of the language found in the Ocean Management Task Force draft recommendations and their statement of justification. Our concern is that in their current form, the Task Force may make recommendations that will simply put many of our members out of business.

All of our members operate small, family owned and operated businesses in Massachusetts. Despite the small size of our businesses, we contribute millions of dollars per year to the Massachusetts economy and greatly enhance the quality of lives for our clients.

Here is an example of the economic contributions we make. The following is the average expenditure per person of Bigfish II Charter customers on fishing trips:

	Cost per person
Cost of Charter ($1,140 for up to 6 people)	$190
Gratuity for Mate	40
Restaurants	60
Drinks	40
Lunch (Box Lunch: sandwiches, chicken, drinks etc.)	20
Fuel (To get to and from Marshfield, MA)	20
Motel (Night before and night of trip)	120
Extras (Personal fishing tackle, sea sick pills etc)	10
	$500

6 people on charter X $500 = $3,000 per charter
Bigfish II Charters operates about 400 charters per year (3 boats)
400 charters X $3,000 = $1,200,000
This is the impact on the Massachusetts economy of just one operation. There are 520 other charter, party and guide boats that operate in Massachusetts.

In fact, there are more than 600,000 residents in Massachusetts who are recreational fisherman. This activity in turn has a total economic impact of over one billion dollars, generates over $10 million in state income taxes and provides over 8,000 jobs. Clearly, this is a significant positive impact for the coastal economy of Massachusetts.

We want you to understand that we do not believe the goals of several members of the task force are related strictly to ocean management in Massachusetts. We believe that task force member Priscilla Brooks is attempting to manipulate the task force recommendation in order to establish a foothold in New England for the political agenda of the Conservation Law Foundation and numerous national environmental organizations. Their agenda as we understand it is to seek a law that will declare up to 25% of all Massachusetts waters permanently off-limits to all fishing. Too often we have found that many of the proponents of no-fishing zones are not advocating for these closures because of the biological necessity.

For example, a gentleman who identified himself as a representative of the organization known as Environmental Entrepreneurs stated at the Task Force public hearing in Boston to the effect that there should be hundreds of closed areas in Massachusetts. His idea was that these closed areas would be good for the environment and the Massachusetts economy. This is totally incorrect.

First, we contend that Environmental Entrepreneurs is nothing more than a front organization of the Natural Resources Defense Council that tries to put a business friendly face on the Natural Resources Defense Council's political agenda of seeking no-fishing zones.

Second, the idea that the establishment of no-fishing zones for economic gain is considered to be unlikely. A paper prepared in 2000 by Dr. Tim McClanahan, Ph.D., States that "Marine reserves (parks) are not likely to be competitive with traditional management tools or will ecotourism operations be profitable to fund reserve maintenance or *meet thelosses of displaced fishers* (Emphasis added)

Indeed, the predictions of economic ruin for fisherman and related industries caused by the establishment of arbitrary no-fishing zones in California have been quantified. A study of the potential impacts of the establishment of no-fishing zones in California concluded that these closures might cost that state $100 million in direct expenditures and up to 2,700 jobs.

Our members operate a fairly small vessel, which translates into limited operating distances. The fish we pursue such as cod, haddock, striped bass, sharks and tuna are migratory and only available in certain areas during different times of the year. Being permanently forced out of productive near-shore fishing grounds will destroy our businesses and way of life and have very harmful impacts in our communities.

Many of the small supportive businesses in coastal communities such as Marshfield, where I operate from, depend on the early season charter fishing operations in March, April, May and June to get them through the economically slow winter and keep them

going until summer months when lots of tourists come to fill their establishments. Motels, restaurants, convenience stores, fishing tackle stores and gas stations depend on our customers to survive.

In Massachusetts, the marine environment can be conserved, protected, and restored without shutting down whole areas to fisherman. We are disturbed that a tiny minority of people such as the representative of Environmental Entrepreneurs and their possible allies on the Task Force are seeking a zoning scheme that gives exclusive rights of access to some to the detriment of a great deal of others. To these individuals we pose this simple question- What ever happened to the traditional value of sharing?

In conclusion, please don't take the suggestions being offered by these environmental organizations. The concept of permanent no-fishing zones is already being debated in the Massachusetts Statehouse and Congress. Conservation Law Foundation is part of a documented consortium of national environmental organizations attempting to force vast, permanent area closures on the nation's 17 million fisherman. Do not allow these organizations and their employees who serve on the Task Force to manipulate the Task Force in to making "back door" recommendations that are contrary to its stated objectives. To do so only involves in a contentious issue that the Task Force has spent essentially no time investigating or contemplating. I urge you to reject all language that will make recommendations specifically intended to impact fisheries management. Instead, I hope that the Task Force will focus its efforts on real issues facing the Commonwealth that do need to be addressed such as the impact of the placement of permanent structures in marine waters, pollution, and public access.

Thank you for your consideration.

Sincerely,
Captain Tom DePersia, President
Stellwagen Bank Charterboat Association

Captain Mike Sosik, President
Northeast Charter Captains Association

CC: Governor Mitt Romney