

R.I. Party and Charter Boat Association P.O. Box 171 Wakefield, RI 02880 401-741-5648 www.rifishing.com



President Vice President Treasurer Secretary Director Capt. Rick Bellavance Capt. Steve Anderson Capt. Andrew D'Angelo Capt. Paul Johnson Capt. Nick Butziger

May 1, 2020

K. Rootes-Murdy, FMP Coordinator Atlantic States Marine Fisheries Commission 1050 North Highland Street Suite 200 A-N Arlington, VA 22201

RE: RI Tautog Conservation Equivalency Proposal

Dear Mr. Rootes-Murdy,

On behalf of the 57 members of the R.I. Party and Charter Boat Association, I would like to submit the following comments regarding Rhode Island's Tautog Conservation Equivalency Proposal.

In Rhode Island, the Party and Charter fleet currently targets Tautog in the fall, beginning October 15th. We have a small presence but a long history in this fishery where possession limits have gone from no limit, to 10, to 6, and now under the MARI Plan, 5 fish per person. The lower possession limit of 5 fish has had a particularly harsh impact on fall for-hire Tautog trips in RI. It seems we may have hit a tipping point in the minds of our clients who chose to fish for Tautog in RI. The For-Hire harvest in RI has fallen from 4648 fish in 2017 to 2281 fish during the first year of the MARI plan and again dropping to 1506 fish in 2019 (preliminary data).

The RIPCBA has supported RIDEM's conservative management of Tautog in RI for many years with proactive size increases, possession limit decreases, and spawning closures and we support the regional management of Tautog with Massachusetts. We recognize that the MARI regional management plan should have addressed the disparity within the states when it was implemented, but it did not. We would like the small nuances of our state fishery to be recognized and allowed through this Conservational Equivalency (CE) proposal. For their needs, Massachusetts decided during the MARI plan development to allow harvest during a period of spawning that RI has chosen to keep closed. When the MARI plan was implemented, the Mass For-Hire possession limit increased from 3 to 5 fish per person, while the RI For-Hire fleet possession limit for its for-hire fleet during an important fall season. The data provided by RIDEM in the proposal suggests that catch by RI's for hire fleet is low overall and comparable with the Massachusetts catch during the June/July spawning closure in RI. The increase catch from the Mass For-Hire possession limit increase was not analyzed in this proposal. The biological impacts of approving this CE proposal will be minimal and offers a way to add needed flexibility to RI for consideration of the spawning closure in place during June and July.

• Page 2

Every RI for-hire permit holder is now required to submit an eVTR for every trip within 48 hours of landing. Failure to report, including "Did Not Fish" reports, could result in loss of that permit. The eVTR collects both landings and discards as well as effort data and optional length frequency data that is helpful in assessment work. This mandatory reporting makes it possible to monitor the impacts of this proposal going forward and adjustments can be made as required based on high quality data provided by industry coupled with dockside APAIS interviews. There are no such mandates for the Mass for-hire fleet at this time, but we would recommend them.

Covid-19 restrictions have shuttered the for-hire fleet in RI starting on April 7 and continuing for the foreseeable future. Social distancing and travel restrictions will further limit the for-hire fleets opportunities for our important summer season. Our fleet has its fingers crossed for a chance at a successful fall season and approving this CE proposal will be positive step in helping us achieve that goal. We ask that you consider the small amount of harvest and the potentially positive socio-economic impacts and approve RI's CE Proposal.

Thank you for the chance to comment and for your time, the PRT's time, the TC's time and the Boards time.

Respectfully Submitted, Capt Ríck Bellavance

Capt. Rick Bellavance, President RI Party and Charter Boat Association

1 Mark Ambrosia	Misty - 43'
2 Steven Anderson	Bare Bones - 32'
3 Stephen Babigian	Lady K - 43'
4 Randell Bagwell	River Rebel - 26'
5 Norm Bardell	Busy Line - 23'
6 Chris Bell	Adventure - 35'
7 Earl Bell	Aces Wild - 35'
8 Rick Bellavance	Priority Too - 36'
9 Russ Benn	Seven B's - 80'
10 Russell Blank	Striker - 30'
11 Frank Blount	Lady Frances - 105'
12 Charles Boranian	Gail Ann - 27'
13 Jon Regini	Shortcake – 23'
14 Nick Butziger	Sea Hawk - 37'
15 Al Caletri	Avenger - 26'
16 Scott Capwell	A to Z - 35'
17 John Carpenter	Jackhammer - 24'
18 Rick Cataldi	Island Girl - 44'
19 Mitch Chagnon	Sakarak - 31'
20 Richard Chatowsky Sr	Drifter Too - 35'

• Page 3

21 Jason Howell 22 Barry Cherms 23 Andrew Dangelo 24 Bill Della Valle 25 Denny Dillon 26 Charles Donilon 27 Steven Follett 28 Matthew Cox 29 Jeff Hall 30 Chris Herz 31 Kip Jenkins 32 Charles Jenison 33 Charlie Johnson 34 Paul Johnson Sr 35 Willam Kelly 36 Tom Logan 37 Scott Lundberg 38 John McCann 39 David Monti 40 Joe Pagano 41 Steven Palmer 42 John Parente 43 Brian Patterson 44 John Rainone 45 Linwood Safford 46 Karl Schmaling 47 Mark Sherer 48 John Sheriff 49 Kelly Smith 50 Rich Templeton 51 David Tyrrell 52 Brian Bacon 53 Rich Napolitano 54 Joe Bleczinski 55 Jeff O'Brien 56 Mike Littlefield

Pamela May - 23' C.J. - 31' Maridee II - 36' Old Salt - 31' Persuder - 44' Snappa - 46' Andrew&Steven - 41' Laura Ann – 38' Fully Involved - 23' Hiz and Herz - 30' Just Fish - 29' Nasha III - 34' Hot Pursuit - 37' Carol J - 31' Knotty dog - 25' Fish Trap - 36' Reel to Reel - 35' Mission - 25 ' Virginia Joan - 26' Stuff it - 23' Lucky Lady - 32' Patty J - 35' Fin Deep - 23' L'il Toot - 35' Cherry Pepper - 32' Vycore - 31' Gannet - 21' Fish On - 29' C-Devil II - 32' Restless - 37' Mako II - 43' Big Game 35' Not Reel Teeth 50' Lady Karen 28' Gannset 48' Arc Angel 21'