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June 4, 2026

Mr. John Hadley, Fishery Management Plan Coordinator & Fishery
Economist

South Atlantic Fishery Management Council
john.hadley@safmc.net

**RE: Comments to Regulatory Amendment 3 to the Fishery
Management Plan for Dolphin and Wahoo**

Dear Mr. Hadley:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA) whose membership includes the for-hire fleet, recreational anglers and commercial fisherman that fish the Stellwagen Bank waters as well as state and federal waters of New England we offer the following comments associated with Amendment 3 to the Fishery Management Plan for Dolphin and Wahoo:

- This fishery is short in duration in New England from typically August through October with weather conditions in the fall resulting in many vessels not leaving the dock. Shore side or near shore access is a rare event and/or nonexistent in New England. As a result, effort, catch and/or mortality is negligible in comparison to areas from Hatteras, North Carolina south and is reflected in the annual catch estimates.
- In general this is not a targeted fishery and takes place during multispecies trips south of Cape Cod and the Islands and/or off shore (Coxes, Claw, Star, etc.) and at the Canyons and is dictated by water temperature and forage with many years the fish remaining as far south as the “Dump” well east of Montauk due to cold water temperatures and forage.
- In many cases mahi saves the day when no other catch occurs at the Canyons or offshore. The Canyons have larger fish and the 20-inch threshold at the Canyons works but will increase discards. The offshore fishery consists of smaller fish less than 20 inches in size that with a 20-inch catch threshold will result in increased discards.
- Mahi is not a targeted fishery in New England; it is short in duration and effort/catch is limited due to the distance to transit



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and access to the fishery. Ultimately the catch in New England is negligible. As a result, the SBCBA recommends the following:

Action 1, Alternative 1 and/or 2, with a 20-inch threshold applicable from Hatteras, North Carolina to Florida and/or those areas where the fishery is different with significant contributions to the catch and/or mortality in comparison to areas north of North Carolina. The dolphin fishery exhibits significant regional variation in abundance, recruitment, and fishing pressure. The Decision Document notes that recent concerns over low dolphin abundance have been most pronounced in the South Florida area, not in regions north of Hatteras, NC. Extending the size limit northward may not address the specific conservation needs of the southern region and could impose unnecessary restrictions on northern fisheries where such measures are not biologically justified.

Action 2, Alternative 2, Modify the applicable geographic range of the 20-inch fork length to Florida to North Carolina to implement such in New England is no different than a closure with a 20-inch threshold. The fishery from Florida to North Carolina is completely different from New England and/or the states from Hatteras, North Carolina to Maine as noted above. While the AP unanimously supported extending the size limit through Maine (Alternative 4), the Decision Document also emphasizes the importance of considering a range of options, including maintaining the current geographic scope. This approach respects the diversity of stakeholder perspectives and allows for targeted management where it is most needed.

The primary need for this amendment is to provide increased conservation benefits to the dolphin fishery. The Decision Document indicates that recent regulatory changes in Florida state waters (e.g., reduced bag and vessel limits) have already addressed conservation concerns in the region most affected by low abundance. Maintaining the current size limit north of Hatteras, North Carolina avoids unnecessary regulatory complexity and ensures consistency with existing federal and state measures.

Action 3, Alternatives/sub-Alternatives 3 – The SBCBA has always questioned the rationale and/or basis for the fifty-four dolphins per charter boat/headboat in New England. A ten fish per angler limit is recommended since the harvest in New England is negligible. The for-hire fleet represents 2% of the harvest in New England and 6% combined from



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Virginia to Maine.

Other options that work to achieve conservation measures where such is needed where the harvest is highest from Hatteras, North Carolina to Florida are recommended. Avoiding Unintended Socioeconomic Impacts Extending the minimum size limit to areas from Hatteras, North Carolina to Maine could negatively impact recreational and commercial fisheries in those regions. These fisheries may not experience the same abundance or recruitment issues as southern areas, and additional restrictions could reduce access and economic opportunities without clear conservation benefits. The Decision Document's inclusion of a "No Action" alternative recognizes the importance of balancing conservation with socioeconomic considerations.

Action 4, Alternative 1 (no Action), rationale detailed above.
We thank you for the opportunity to provide these comments.

Very truly yours,

Capt. Timothy Brady

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