

I begin my comment with an open invitation to Loretta O Brian and Mike Palmer to come out on a fishing trip with me anytime. in the past Steve Murawski and John Brodsiak made trips with me and found them enlightening.

My name is Mike Russo, I am the owner operator of the FV GULF VENTURE. The Gulf Venture is a 40' gillnetter currently enrolled in the Trip Gillnet category. undoubtedly the smallest trip netter in New England. We make 3 to 5 day trips anywhere inside the US Canadian line. We fish between 48 to 96 nets daily depending on location and conditions. Soak times typically under 16 hrs.

I have been groundfishing as a crew and Captain for 30 years now, primarily with tub trawl and gillnet. Most of my experience is from fishing east of the Cape but in recent years have expanded my range thru out the Gulf of Maine and out to the Eastern area on GB.

After last year's GOM cod assessment and the subsequent quota reduction ,I had to bring my boat back to the Cape to fish on GB. There's more cod in the GOM than what nmfs says and the quota is very difficult to lease. Now we're going to be up against the same situation on GB.

This summer I've made 9 trips in the EGB and WGB stock areas. In the eastern area I have no experience, I found cod in 25 to 30 fathom and had hauls over 10000lbs in one day. On my last trip there I fished in 100 to 110 fathom and found cod ,I left the because I was looking for pollock and hake. Day 2 and 3 of that same trip was spent on Franklin Swell . By day 3 I had found fish and it was primarily cod in 90 to 100 fathoms. I made 3 more trips to Franklin and had good catches with 50% of the Catch being cod. In my past experience I've never had that kind of cull deeper than 65 fathom. Also my catch of cod has been averaging 25% large cod, the best %s being up to 50% in 95 fathom. That's an indication to me that there's some large cod around ,large cod tend to bounce off 6.5 in gear ,the ones you catch are usually rolled up in the net. Same trend I have been experiencing in the GOM . I feel the cod stock has shifted to the deep water in the WGB area. .Grey Seals, dogfish and water temps I believe are the biggest reasons.

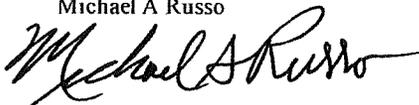
If a 150 mt TAC were in place this year my wgb my landings would have accounted for close to 8% of the quota in 9 days. I can't stress enough that this is the SMALLEST boat currently groundfishing in New England In the trip gillnet category. I have been working without the benefit of a network on GB. I steam 18 hrs and not see another groundfish boat. I'm finding cod in various quantity everywhere I go beyond the inshore bottom off the Cape.

I do not believe the trawl survey is finding the fish in the deep water on GB and GOM. If the stock is so low ,why am I finding them from 25 to 110 fathom and over a wide geographic range? I will not accept the excuse that I'm seeing the last aggregation of cod .

However there are problems inside of 50 miles from the Cape .that's why I shifted offshore. The Grey seals And dogfish have destroyed the inshore fishing . I have little hope that I'll be able to catch a trip of cod within sight of the Cape for the rest of my career. Cutting the WGB cod quota will do nothing to solve those issues. It's not a problem caused by commercial fisherman and I feel we shouldn't be penalized for it.

sincerely

Michael A Russo





Franklin Swell 95 FATHOM  
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