



# National Association of Charterboat Operators

P.O. Box 2990 Orange Beach, AL 36561

Phone (251-981-5136) Fax (251-981-8191)

E-Mail: [info@nacocharTERS.org](mailto:info@nacocharTERS.org) Web: [www.nacocharTERS.org](http://www.nacocharTERS.org)

**Bobbi M. Walker**  
*Executive Director*

**Bob Zales, II**  
**Panama City Boatman Assn.**  
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**Maryland Charter Boat Assn.**  
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#### **Member Associations :**

Beach Haven Charter Fishing Assn.  
Black River Charter Guides Assn  
Cape Cod Charter Boat Assn  
Cape May County Party & Charter Boat  
Captree Boatman Open & Charter Boats  
Charterboat Assn. Of Puget Sound  
Chicago Sportfishing Assn.  
Deep Creek Charterboat Assn.  
Destin Charterboat Assn  
Eastern Lake Erie CharterBoat Assn.  
Florida Guides Association, Inc.  
Genesee Charterboat Assn, Inc.  
Golden Gate Fishermen's Assn.  
Homer Charter Assn.  
Ilwaco Charter Assn.  
Indiana's North Coast Charter Assn.  
Kenosha Charterboat Assn.  
Key West Charter Boatmen's Assn.  
Lake Michigan Sportfishing Assn.  
Marathon Guides Association  
Marco Island Charter Captain's Assn.  
Maryland Charterboat Assn.  
Michigan Charterboat Assn.  
Michigan City Charterboat Assn.  
Mississippi Charterboat Captain's Assn.  
Orange Beach Fishing Assn.  
Panama City Boatmen Assn  
Pennsylvania Lake Erie Charter Captain  
Pensacola Charterboat Assn.  
Petersburg Charterboat Assn.  
Port Aransas Boatmen Inc.  
Prince William Sound Charter Boat Assn  
Seward Charterboat Assn.  
Sitka Charter Boat Operators Assn.  
Sportfishing Association of California  
Steinhatchee Charterboat Assn  
Thumb Area Charter Captains Assn.  
Virginia Charter Boat Assn.  
Westport Charterboat Association

Commander (dre)  
Ninth Coast Guard District  
1240 East 9th Street  
Room 2069  
Cleveland, OH 44199

By Fax to 216-902-6055

November 13, 2006

Re: Safety Zones; U.S. Coast Guard Water Training Areas, Great Lakes  
(CGD09-06-123)

Dear Commander Wulfkuhle,

The National Association of Charterboat Operators (NACO) is the premiere voice for charter boats across the United States. We represent more than 3,200 vessel owners and operators who operate passenger vessels.

Many NACO members operate in the Great Lakes and are concerned about the live fire areas being proposed for Coast Guard water training areas. This proposal seems to be in direct conflict with recreational fishing and passenger vessels operating on the Great Lakes. Surely, in the vast reaches of the Coast Guard they can locate areas in which to conduct live fire training that do not conflict or cause unnecessary peril to passenger vessels and recreational anglers. The lethal consequences that could incur do not warrant approval of this proposal.

In addition to safety concerns, NACO notes that forcing these vessels to route around live fire safety zones will have an adverse economic impact on vessels that would be near impossible to measure. Additionally what economic impact would be associated with tourism throughout the Great Lakes?

According to a 2000 study by Fish and Game seven of the eight Great Lakes States were identified as the top 20 states in the United States with the most number of registered boats. Michigan ranked #1 followed by Minnesota #4, Wisconsin #6, New York #7, Ohio #8, Illinois #10 and Pennsylvania #11. Needless to say the Great Lakes has an enormous number of recreational vessels that would be affected by this proposed rule.

We look forward to hearing from you regarding this proposed rule.

Sincerely,

Bobbi M. Walker  
Executive Director

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