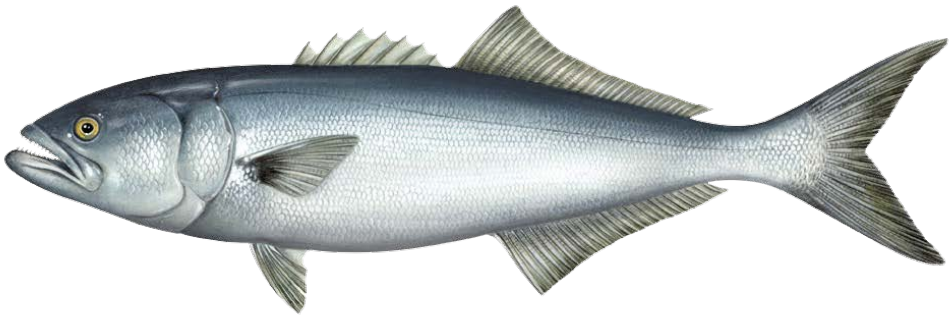
Bluefish Allocation and Rebuilding Amendment Scoping Comments Summary



March 2020

Prepared by the Mid-Atlantic Fishery Management Council (MAFMC or Council) and the Atlantic States Marine Fisheries Commission (ASMFC or Commission)

TABLE OF CONTENTS

1 INTRODUCTION AND COMMENT SUMMARY

1.1 SCOPING OVERVIEW

The Mid-Atlantic Fishery Management Council and the Atlantic States Marine Fisheries Commission have proposed to develop a Bluefish Allocation and Rebuilding Amendment. This amendment was initiated in order to review/revise the FMP goals and objectives, commercial/recreational allocations, commercial allocations to the states, the quota transfer processes, develop a rebuilding plan, and any other issues. Additional information and amendment documents are available at: https://www.mafmc.org/actions/bluefish-allocation-amendment.

The supplemental scoping process commenced from publication in the Federal Register on February 6, 2020 and continued through March 17, 2020 and included eleven public scoping hearings held from Massachusetts through Florida (Table 1). Scoping is the process of identifying issues, potential impacts, and reasonable alternatives associated with a particular management issue. It provides the first and best opportunity for the public to make suggestions or to raise issues and concerns before development of an amendment begins. No alternatives are set during the scoping process.

Table 1: Scoping hearing schedule.

Date	Time	Address
February 13, 2020	7:30-9:00 PM	Massachusetts Maritime Academy, Admiral's Hall, 101 Academy Drive, Buzzards Bay, MA 02532
February 18, 2020	6:00-8:00 PM	Ocean County Administration Building, Room 119, 101 Hooper Avenue, Toms River, New Jersey 08753
February 19, 2020	7:00-8:00 PM	Delaware Dept. of Natural Resources & Environmental Control Auditorium, Richardson & Robbins Building, 89 Kings Highway, Dover, Delaware 19901
February 25, 2020	4:45-6:00 PM	Berlin Library, 13 Harrison Ave. Berlin, MD 21811
February 26, 2020	7:30-9:00 PM	Rhode Island Division of Marine Fisheries, University of Rhode Island Bay Campus, Corless Auditorium, South Ferry Road, Narragansett, Rhode Island 02882
February 26, 2020	8:00-9:00 PM	Connecticut Department of Energy and Environmental Protection Marine Headquarters Boating Education Center (Rear Building), 333 Ferry Road, Old Lyme, CT 06371
February 27, 2020	6:00-7:30 PM	NC Division of Marine Fisheries Central District Office, 5285 Highway 70 West, Morehead City, North Carolina 28557
February 27, 2020	7:30-9:00 PM	Stony Brook University, School of Marine and Atmospheric Sciences (SOMAS), Room 120 Endeavour Hall; Stony Brook, NY 11794
March 2, 2020	6:00-8:00 PM	Merritt Island Service Center Complex, 2575 N. Courtenay Pkwy #205, Merritt Island, FL 32953
March 2, 2020	6:00-7:00 PM	Virginia Marine Resources Commission, 380 Fenwick Road Bldg 96 Fort Monroe, VA 23651
March 4, 2020	6:00-7:30 PM	**Internet webinar**: http://mafmc.adobeconnect.com/bf_allocation_rebuilding_scoping/ For audio-only access, dial 800-832-0736 and enter room number 5068609.

1.2 Summary of Comments

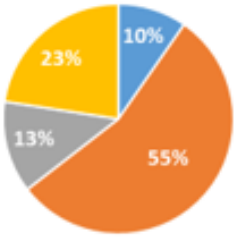
This document summarizes the major themes of written and hearing comments (section 1), in addition to providing detailed scoping hearing summaries (section 2) and copies of all written comments received (section 3). Attendance across all hearings exceeded 208 individuals. Of the 208+ people, 75 individuals provided a total of 132 comments on the issues representing individuals and organizations from almost all states that had a hearing. A total of 141 written comments by 84 individuals were received via email, hand delivered, or mail on a variety of issues.

Table 2 summarizes major themes of the comments, with the corresponding number of comments received on each issue. This list reflects the most commonly raised themes for each general issue, and does not reflect all issues raised in the written comments. See section 3 for the full text of written comments.

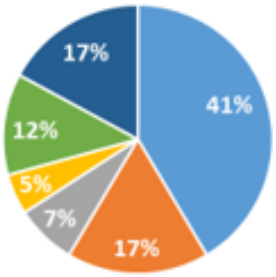
Comments were received on all six issues, however, the most frequently discussed issues (as summarized in Table 2) were "other issues", followed by the rebuilding plan, the quota transfer processes, the commercial and recreational allocations, the FMP goals and objectives, and the commercial allocations to the states. Trends identified within the comments pertaining to "other issues" are presented in Table 3. For the rebuilding plan, more comments supported a longer plan (up to ten years) rather than being as short as possible. Many individuals reasoned that a longer-term plan would be less disruptive to the current recreational measures than a short rebuilding plan. The public's view of the transfer of quota from the recreational to the commercial sector was split. The majority of comments coming from the commercial sector approved of the process and the majority of comments coming from the recreational sector opposed it. Most people support state-to-state transfers and appreciate the ability to move quota, but many individuals stated they do not want to see this occur during the rebuilding plan. For sector allocations, many individuals support status quo or utilizing an updated time series. Most individuals would like to see the FMP goals and objectives revised to include an emphasis on environmental conditions and the importance of the snapper fishery. For commercial allocations to the states, comments were split between status quo and adjusting with an updated time series, but most of the northern states indicated they would like to see an increase in their quota (or at least no decrease).

Table 2: Summary of major written comment themes and number of comments received. Because most commenters addressed multiple issues, numbers do not add to total number of submitted written comments. Note: The percentages in the pie charts may not equal 100% due to rounding.

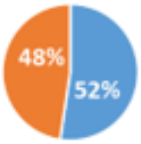
Issue 1: FMP Goals and Objectives	Number of comments
Supports status quo	3
Goals and objectives should be re-evaluated and/or revised	17
Supports maintaining one or more of the current objectives	4
Bait/Snapper fishery is important	7



Issue 2: Commercial/Recreational Allocation	Number of comments
Supports status quo	17
Increase commercial allocation	7
Decrease commercial allocation	3
Increase recreational allocation	2
Decrease recreational allocation	0
Use revised MRIP to update allocations/revise time series	5
New allocation suggestion	7



Issue 3: Commercial Allocations to the States	Number of comments
Supports status quo	11
Alter commercial allocations to the states	10



Issue 4: Quota Transfer Processes	Number of comments
Supports status quo transfer from recreational to commercial sector	10
Do not allow transfer from recreational to commercial sector	13
Supports status quo state-to-state transfers	14
Do not allow state-to-state transfers	3
New transfer suggestion	2

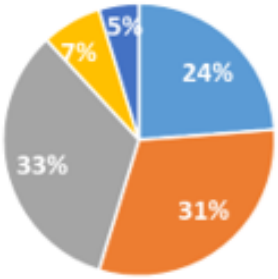
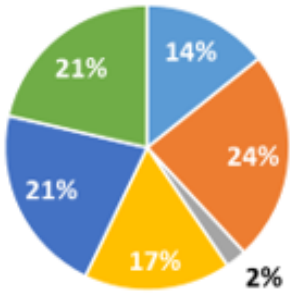


Table 3 Continued.

Issue 5: Rebuilding Plan	Number of comments
Stock should be rebuilt quickly	6
Stock should be rebuilt within a long time frame with minimal change to management measures	10
Supports constant harvest under the current ABC	1
Stock is affected by environment/further research is needed	7
Doubts the overfished status/stock status cyclical	9
Other	9



Issue 6: Other Issues	Number of comments
For-hire sector separation or allowance	11
Doubts MRIP data/greater transparency needed	8
Status quo bag limit	4
Increase bag limit	21
Decrease bag limit	1
Other	52

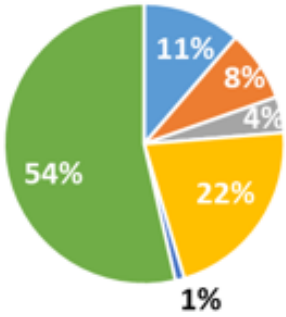


Table 3: Examples of comments that were provided by more than one individual under Issue 6-6 (Other Issues – "Other").

Issue 6: Other Issues – "Other"
Add a minimum size limit
Identify the intrinsic value of fish left in the water
Emphasize the catch-and-release aspect of the fishery
Maximize abundance
Address the discard mortality assumption rates
Ecosystem based management
More research on stock dynamics needed
Close the fishery until it is rebuilt
Georgia DNR – *de minimis* request
General observations

1.3 SUMMARY OF PUBLIC SCOPING HEARINGS

The following section contains brief summaries of attendance and major comment themes at each of the eleven supplemental public scoping hearings (listed by date). For a more detailed record of hearing comments, see section 2.

Buzzards Bay, MA

Ten individuals provided public comment out of approximately 30 total attendees (some of the attendees did not plan on coming to the bluefish hearing, but stayed after the fluke, scup, black sea bass hearing). The majority of attendees represented the for-hire sector, but there were also several attendees representing the commercial sector. Many commenters expressed frustration with MRIP, citing a lack of transparency in how the estimates are generated and they doubted the credibility of the estimates. For-hire fishermen were supportive of sector separation, whereby the for-hire sector would obtain its own allocation. All those who commented on the rebuilding plan timeline were supportive of selecting the longest timeframe possible in order to prevent any major changes to recreational measures. A few individuals commented on reassessing the state-by-state commercial allocations and updating the percentages using a more recent timeframe.

Toms River, NJ

Approximately 20 people (including NJ staff) attended the hearing in Toms River, NJ and 14 provided public comments. In addition to their verbal comments, two fishermen provided written comments to Council staff. The attendees were a mix of recreational for-hire fishermen, private anglers, and commercial fishermen. Of those who offered comments, many spoke in favor of maintaining the current 83/17 allocation between the recreational and commercial sectors, respectively, and do support the quota transfer from recreational to commercial, when available.

Many attendees were concerned about the current recreational bag limit, which was recently reduced to 3 fish for private and shore anglers and 5 fish for for-hire anglers. They are concerned that the bag limit is going to continue to decline in the next few years, especially with the implementation of a rebuilding plan. The for-hire captains are very concerned with the implications these reductions will have on their businesses.

Of the commercial fishermen attendees, many did not want to see the state allocations changed because they are concerned New Jersey's allocation will decline. Support for the state-to-state transfers was split amongst attendees. Some fishermen appreciate the flexibility afforded to states in increasing their quota when needed while others feel that quota should not be shifted around the coast since bluefish migrate throughout the coastal waters.

Most attendees were in support of a 10-year rebuilding plan because it will have less of an impact on commercial quotas and recreational measures. If the rebuilding plan is longer, there is the potential to have higher ABCs. However, most anglers would still like to see improved data collection (in reference to MRIP) utilized in the stock assessments. In turn, this data ultimately drives the development of the rebuilding plan.

Dover, DE

Approximately 19 people (including staff) attended the hearing in Dover, DE and 7 provided public comments. The attendees were a mix of recreational and commercial fishermen. Of those who offered comments, many spoke in favor of maintaining the current 83/17 allocation between the recreational and commercial sectors, respectively. Individuals generally were in favor of status quo for the commercial allocations to the states because they are concerned that they may lose quota if the allocations are revisited. Additionally, most

attendees continue to support the ability to transfer quota from the recreational to commercial sector and the transfer of commercial quota between states.

Many attendees were concerned about the current recreational bag limit, which was recently reduced to 3 fish for private and shore anglers and 5 fish for for-hire anglers. They are concerned that the bag limit is going to continue to decline in the next few years, especially with the implementation of a rebuilding plan. The for-hire captains are very concerned with the implications these reductions will have on their businesses, especially since the number of for-hire vessels on the DE coast has drastically declined in recent years.

Almost all attendees expressed major concerns with the MRIP estimates and feel they should not be used in setting recreational quotas and management measures.

Berlin, MD

Approximately 17 people (including MD staff) attended the hearing in Berlin, MD and 4 provided public comments. There were representatives from the private recreational, for-hire, and commercial sectors. Much of the initial conversation revolved around the MRIP estimates. Most stakeholders in the room did not support the new estimates and think they should be revised (or different data sets used) prior to reallocating quota within the fishery. Stakeholders also questioned the change in stock status and 200,000 mt target that must be reached through the rebuilding plan.

Many anglers indicated that bluefish are caught mostly as bycatch or for bait. There is not much targeted effort since anglers and commercial fishermen prefer to target other (more palatable and lucrative) species. For allocations, commercial fishermen are concerned with losing quota and recreational anglers supported status quo.

Individuals supported revising the FMP goals and objectives to include the importance of environmental conditions and predation on bluefish stock status. Stakeholders noted that bluefish are no longer found in locations where they were once abundant. Many observed that the fish are moving further offshore and into northern waters.

Narragansett, RI

A total of eight people, including three RIDEM staff members, attended the hearing and four attendees provided public comment. The attendees included three for-hire boat Captains, a commercial gillnetter, and a RI based seafood dealer. The specific comments provided are below.

Old Lyme, CT

Approximately 14 people attended the hearing in Old Lyme, CT and 4 offered comments related to the Allocation and Rebuilding Amendment. The party/charter and commercial sectors were well represented at the hearing. However, they did not want to speak much about allocations or rebuilding because most attendees lacked any support whatsoever for the new MRIP estimates. When discussion occurred, stakeholders agreed that the since the commercial allocation is so small and CT is already not meeting it, there is not much reason to revise it. Recreationally, anglers do not want to see changes until more accurate data is used.

Often, discussion went to tangential subjects such as the status of striped bass and tautog, local permitting issues, and interest in changing the reporting methodologies.

Many stakeholders emphasized the lack of bait issues, electronic monitoring, and environmental conditions within the FMP goals and objectives. Additionally, general consensus supported status quo allocations due to the lack of confidence in the MRIP estimates.

Morehead City, NC

The MAFMC/ASMFC Bluefish scoping hearing in Morehead City, North Carolina had minimal attendance. Four members of the public attended as well as four North Carolina Division of Marine Fisheries staff (Chris Batsavage, Alan Bianchi, Sargent Ashley Bishop, and Officer Zach Nelson). The public included one commercial fishery representative and three recreational fishery representatives. However, only two of the attendees spoke.

Most of the initial comments were focused on concerns with the current recreational bag limits and the impacts to North Carolina's fishing piers. There was much discussion that the impact to the piers wasn't accounted for and there was also some concern on the estimates generated by MRIP. Attendees felt that the pier component of the fishery wasn't accurately accounted for in MRIP calculations. Attendees were also concerned about discard mortality from future management that will create a large number of discards negating the impact of trying to reduce fishing pressure to rebuild the stock.

The attendees felt only minor modifications were needed for the goals and objectives. The suggested modifications were to include management flexibility and equitable access to bluefish for all user groups. The commercial representative asked about the objective of gaining a better understanding of the stock status and wondered if we have gained any better insight on the stock since the initial FMP. A recreational representative also noted that he felt that the objective of providing the highest availability of bluefish has not been met.

Attendees felt that the current allocation between the recreational and commercial sectors were adequate and that the ability to transfer quota between sectors should remain in place. They felt there was no need to revisit the commercial allocations to the states as long as the flexibility remained to transfer quota between sectors and between the states when necessary.

Attendees did not really have any input on the rebuilding plan time period. They felt it was hard to make any recommendations or to provide input without seeing what types of management measures would need to be put in place to shorten the time frame of the rebuilding plan.

Stony Brook, NY

Approximately 50 people (including NY staff) attended the hearing in Stony Brook, NY and 12 provided public comments (~20 more offered status quo comments by a show of hands – see the comment summary). In addition to their verbal comments, some stakeholders provided written comments to Council staff. The attendees were a mix of recreational for-hire fishermen, private anglers, commercial fishermen, reporters, staff, and other.

Many individuals spoke in favor of maintaining the current sector and commercial state-to-state allocations, while some were hopeful of seeing increases to NY's commercial quota. There was also support for maintaining the commercial state-to-state transfers because NY often benefits, and other states have the option to approve or disapprove of a transfer request. Most stakeholders support the sector-based transfer because it only occurs if available, however a few individuals did not show support because they view the recreational sector as participating in more of a catch and release fishery. They do not want to see their released fish transferred to the commercial sector.

Most for-hire attendees were concerned about the current recreational bag limit, which was recently reduced to 3 fish for private and shore anglers and 5 fish for for-hire anglers. They are concerned that the bag limit is going to continue to decline in the next few years, especially with the implementation of a rebuilding plan. The for-hire captains are very concerned with the implications these reductions will have on their businesses. Other stakeholders also spoke out on the importance of the Council to consider the socioeconomic impacts associated with reductions in quotas and implementation of management measures.

Recommendations were split amongst stakeholders for the rebuilding plan. Many individuals want to stretch the plan to ten years because it will offer the least negative impacts on fishermen throughout the process (higher quotas). However, others want it as short as possible to get out of the rebuilding phase. Overall, most anglers would still like to see improvements to the data (particularly MRIP) utilized in the stock assessments that are ultimately driving the development of the rebuilding plan.

Merritt Island, FL

Only 3 people (including staff) attended the hearing in Merritt Island, FL. No verbal comments were offered at the hearing, but attendees noted that written comments will be submitted at a later date. Discussion predominantly revolved around the MRIP estimates and their influence on Florida's overall catch. Then, Florida staff indicated that the allocations should be reviewed and noted that Florida often transfers some of their commercial quota to other states.

Fort Monroe, VA

Only 3 people (excluding staff) attended the hearing in Fort Monroe, VA and 2 offered comments related to the Allocation and Rebuilding Amendment. Both the recreational and commercial sector were represented.

Some discussion during the hearing revolved around stakeholders' opinions of the new MRIP estimates. However, much of the conversation focused on how bluefish migration patterns and habitat preference has changed over time. Both commenters noted that changes in abundance may be due to climate change and/or food availability.

Internet Webinar

Approximately 26 people (attendees signed on and off throughout) attended the webinar hearing and 8 provided public comments. In addition to their verbal comments, many stakeholders indicated they will be submitting written comments. The attendees were a mix of recreational for-hire fishermen, private anglers, commercial fishermen, state and federal staff, and other organization representatives.

Discussion started around the lack of confidence stakeholders have in the new MRIP estimates. Many stakeholders are concerned that the Council is going through a rebuilding plan using recreational estimates that are considered inaccurate. However, when commenting on the rebuilding plan, most individuals were in favor of a longer rebuilding plan (10 years) that allows for higher ABCs. Additionally, some stakeholders emphasized they would like to see a dynamic rebuilding plan that offers higher quotas as the stock begins to rebuild.

Many for-hire captains are very concerned with how the reductions associated with the 2020 management measures will affect their businesses.

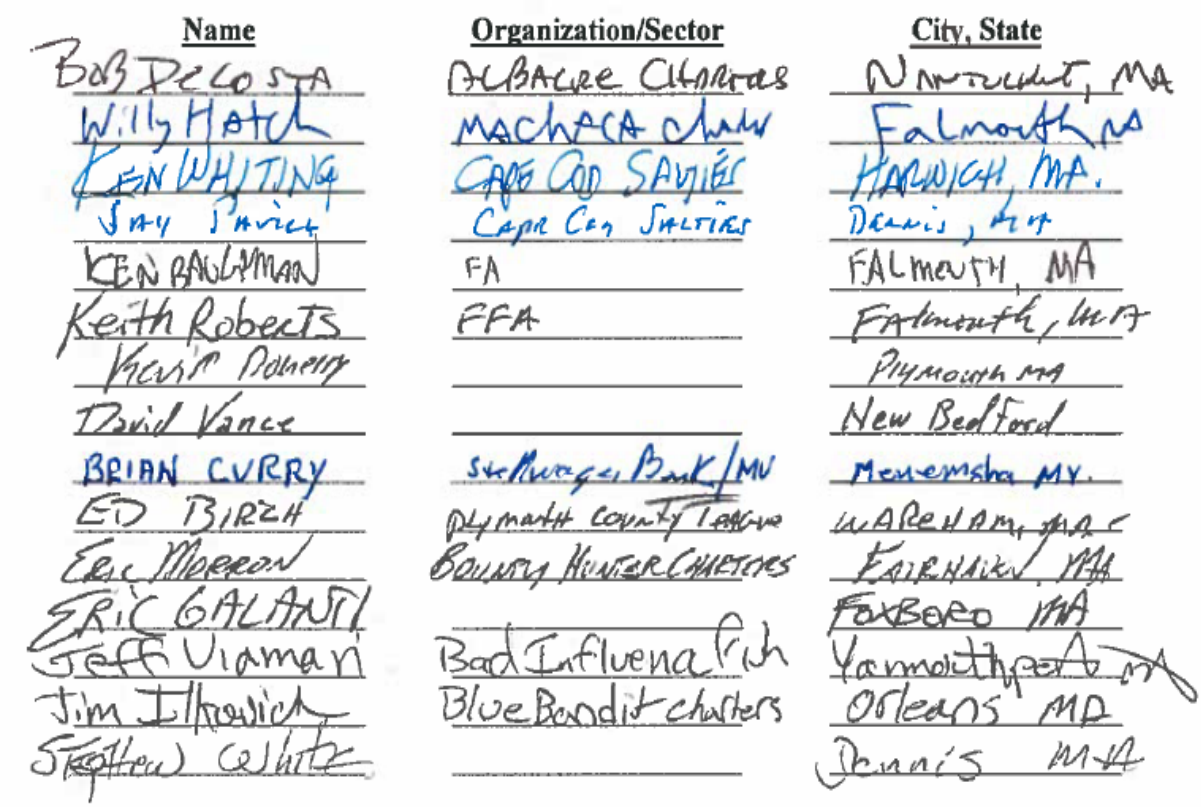
Of the commercial stakeholders, many noted they do not want to see the state allocations changed because they are concerned that their state's allocation will decline. There was strong support for the state-to-state transfers because it offers an extra opportunity to increase quotas.

There was extensive discussion on the transfers. Most comments supported the sector-based transfer (recreational to commercial). However, stakeholders would like to see if it is possible to have a dynamic transfer allowance that can be transferred back and forth between sectors depending on which sector is actually in need of a transfer.

2 SCOPING HEARING SUMMARIES

2.1 BUZZARDS BAY, MA

February 13, 2020



Name	Organization/Sector	City, State
Bob DeCosta	Bluefin Charters	Nantucket, MA
Willy Hatch	Machaca charter	Falmouth, MA
Ken Whiting	Cape Cod Sailfish	Harwich, MA.
Tony Patrick	Cape Cod Sailfish	Dennis, MA
Ken Baldyman	FA	Falmouth, MA
Keith Roberts	FFA	Falmouth, MA
Kevin Powers		Plymouth MA
David Vance		New Bedford
Brian Curry	Stellwagen Bank/MV	Menemsha MV.
Ed Birch	Plymouth County Tarpon	Wareham, MA
Eric Moreau	Bounty Hunter Charters	Falmouth MA
Eric Galanti		Foxboro MA
Jeff Viaman	Bad Influenza fish	Yarmouthport MA
Jim Illowich	Blue Bandit charters	Orleans MA
Stephen White		Dennis MA

Issue 1

No comments.

Issue 2

No comments.

Issue 3

- **Tom Smith** (commercial gillnetter): Commercial state-by-state quotas should be reconsidered given some states routine underutilization, e.g., FL and VA; He thinks that the state by state quotas should be updated to reflect current data, a 10-year average should be used.

Issue 4

- **Tom Smith** (commercial gillnetter): Commercial state-to-state transfer ability should be maintained as a management tool.

Issue 5

- **Pete Kaizer** (Nantucket Charter): He is concerned that the stock is hurting from environmental factors rather than overfishing; he has personally observed the on/offshore movements of bluefish from flights; should work with spotter planes or others to try to get confirmation.
- **Jim** (Charter): Doubts the overfished stock status. Other reasons affect availability to fisheries and surveys that ought to be considered, such as predation on bluefish by tuna. Concerned about a size limit being used as a management tool for rebuilding because this would affect use of bluefish as bait for tuna fishing.
- **Willy Hatch** (charter): Doubt the overfished stock status; bluefish evade trawls so trawl surveys not a good indicator; history of bluefish is cyclical – not a lot of sand eels lately to bring them in close.
- **Tom Smith** (commercial gillnetter): Doubts the overfished stock status; Bluefish are a highly cyclical species, fluctuations in stock size are part of the natural process. Rebuilding should take place over a 10-year period to avoid major changes in quota.
- **Bobby Costa** (Charter): Supports a longer rebuilding plan because he is concerned that measures will be overly restrictive. He is concerned about fishery closures, he doesn't want to see the recreational fishery get closed. Bag limits should not be dropped lower than 5 and 3 fish even if it means a longer rebuilding period; also concerned about closures as a management tool for rebuilding; variable spatial distribution by month. Recommend a tagging study to better know where bluefish go; seal and tuna predation driving fish offshore.
- **Bryan Curry** (Commercial): Socioeconomics need to be considered in setting the rebuilding timeline; longer timeline to minimize impact. A long term look at rebuilding is important to keep measures not overly restrictive. Consistency in measures across years is important to maintaining for-hire activity. Doubt the overfished status; stock migration is cyclical; fish are elsewhere, e.g., chasing bait offshore.
- **Eric Morrow** (Bounty Hunter Charters): There is a lack of trust in the MRIP data. Finds it hard to believe that the stock is actually overfished. People are losing faith in the management. Fish have redistributed offshore, as bluefish cyclically do due to bait or other environmental conditions. Concerned that we will implement a rebuilding plan and suffer from restrictive measures that we later realize was not needed.

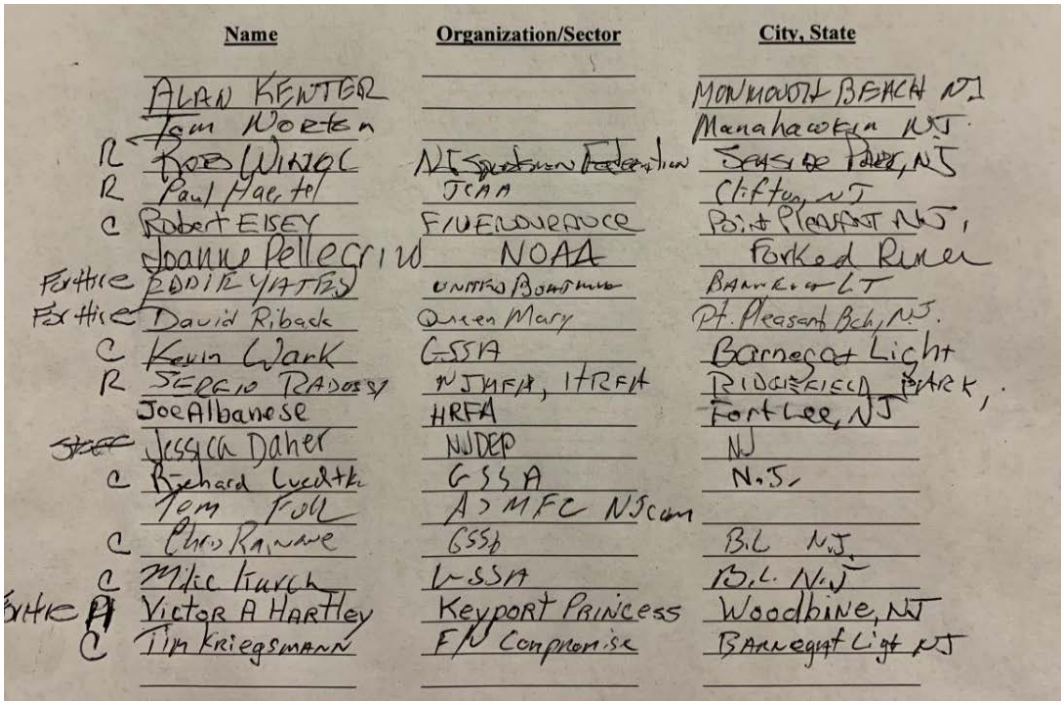
Issue 6

- **Jim** (Charter): He likes the idea of giving the for-hire sector a larger bag limit.
- **Willy Hatch** (charter): Agree with sector separation as a management tool; i.e., higher bag limit for for-hire vessels. Opposed to a size limit; bluefish used as bait for bluefin tuna and mako sharks. Concern that MA quota will close prematurely and those that catch a minimal amount for bait use will be shut out by fall; MA should consider a correction (e.g., lower the trip limit). Rec bag limits should not be reduced lower than they are now.
- **Tom Smith** (commercial gillnetter): Opposed to MA reducing the commercial trip limit for bluefish.
- **Eric Morrow** (Charter): Snapper fishery is critical component of fishery that needs to be preserved in some capacity.
- **Bryan Curry** (Commercial): Supports recreational sector separation between for-hire and private anglers. Bluefish need to be used as bait, we cannot restrict the fishery with a minimum size.
- **Mike Pierdinock** (Charter): For-hire eVTR data needs to be more fully utilized in management.
- Patrick Cassidy (Cape Cod on the Fly): Size limit could be tailored to address different segments of the fishery, e.g., bait, snappers.

- **Bobby Costa** (Charter): Doubt MRIP data on MA landings; Nantucket is epicenter of bluefish fishery and personal observations do not support MA rec fishery having taken just under 2,000,000 lbs across 2017-2018.
- **Brian** (Charter): NOAA Fisheries needs to do better outreach about MRIP methods to stakeholders to increase our confidence in the data; frustrated that there is never an MRIP person at these meetings.

2.2 TOMS RIVER, NJ

February 18, 2020



Name	Organization/Sector	City, State
ALAN KENTTER		MONMOUTH BEACH NJ
Tom Norton		Manahawkin NJ
R Rob Winkel	NJ Sportsmen Federation	Sea Isle City, NJ
R Paul Haertel	JCAA	Clifton, NJ
C Robert EISEY	FIVEFISHERIES	Pt. Pleasant NJ,
Joanne Pellegrino	NOAA	Forked River
For Hire EDDIE YATES	UNITED BOATMEN	BARNEGAT LT
For Hire David Riback	Queen Mary	Pt. Pleasant Bch, NJ.
C Kevin Wark	GSSA	Barnegat Light
R SERGIO RADOSSY	NJFA, HRFA	RIDGEFIELD PARK,
Joe Albanese	HRFA	Fort Lee, NJ
~~Staff~~ Jessica Daher	NJDEP	NJ
C Richard Lucatte	GSSA	N.J.
Tom Fote	AOMFC NJ.com	
C Chris Rainone	GSSA	B.L. NJ.
C Mike Kurch	GSSA	B.L. NJ
For Hire Victor A Hartley	Keyport Princess	Woodbine, NJ
C Tim Kriegsmann	F/V Compromise	Barnegat Lgt NJ

Issue 1

- **Sergio Radossi**: Disconnect between fisheries management and what actually occurs. Increase sampling.
- **Rob Winkel**: More stakeholder meetings.
- **Kevin Wark**: Look at the fishery through an environmental perspective. Start thinking about environmental shifts.
- **Tom Fote**: Need a better system of surveying the public through increased funding. Economic impact for a rebuilding plan from 5 to 10 years.
- **Paul Haertel**: Bring the stock to a sustainable level and consider an ecosystem approach.
- **Eddie Yates**: Incorporate the financial impact on the fishermen and associated stakeholders.

Issue 2

- **Victor Hartley**: Leave the allocations at 83% - 17%. If we are not hitting the allocations now, why change them.
- **Paul Haertel** (NJCAA): If the new MRIP numbers are showing 90% recreational them make the new allocations 90% recreational and 10% commercial.

- **Kevin Wark**: Leave the allocations at 83% - 17%. We got shortchanged in the beginning. Fish are there, but our gear is not effective, especially until the fish move back to shore. We should not be taking fish from anybody. Need to consider what reducing the commercial quota does to a fishery that is not productive for fishermen that have been doing this for a long time.
- **Rob Winkel** (Sportsman Association): Leave the allocations at 83% - 17%. MRIP is driving almost all the issues and needs to be reevaluated. The survey is jaded towards success and the extrapolation causes issues.
- **David Riback**: Leave the allocations at 83% - 17%.
- **Sergio Radossi**: Need to get a handle on the stock before making any adjustments.
- **Eddie Yates**: Need better data. Leave the allocations at 83% - 17% until things improve.

Issue 3

- **Kevin Wark**: Leave alone the allocations until we understand how this fishery is evolving. Do not want to see us lose our historical participation in the fishery.
- **Chris Rainone**: Leave the allocations alone until we understand how this fishery is evolving.
- **Robert Elsey**: Leave the allocations alone until we understand how this fishery is evolving.
- **Paul Haertel**: Leave the allocations alone until we understand how this fishery is evolving.
- **David Riback**: Leave the allocations alone until we understand how this fishery is evolving.
- **Michael Karch**: Leave the allocations alone until we understand how this fishery is evolving.
- **Rick Luedtke**: Leave the allocations alone until we understand how this fishery is evolving.
- **Tim Kriegsmann**: Leave the allocations alone until we understand how this fishery is evolving.
- **Victor Hartley**: Leave the allocations alone until we understand how this fishery is evolving.

Issue 4

- **David Riback**: No commercial state to state transfers. Sector transfer can continue as needed.
- **Sergio Radossi**: No transfers at all.
- **Victor Hartley**: Would like to see the ability to transfer quota from the commercial to recreational sector. No commercial state to state transfers; NJ needs to keep all the quota they can.
- **Paul Haertel**: No to both transfers at least until rebuilding has concluded.
- **Joe Albanese**: No to both transfers at least until rebuilding has concluded.
- **Kevin Wark**: Commercial state to state is a useful tool to keep people fishing, but maybe not during rebuilding.
- **Rob Winkel**: Commercial state to state is a useful tool to keep people fishing, but maybe not during rebuilding. Better understand recreational harvest prior to doing sector based transfers.
- **Paul Haertel**: Recreational fishermen have a lot to lose, so do not consider transferring from commercial to recreational.
- **Chris Rainone**: Commercial state to state is a useful tool to keep people fishing, but maybe not during rebuilding.

Issue 5

- **Kevin Wark**: Stretch it out to 10 years because a lot of this is environmental. We need to see things improve and we do not want to put people and businesses (e.g. party) through a lot of stressors. This offers the fish protection due to availability of vessels. The fish are protecting themselves.

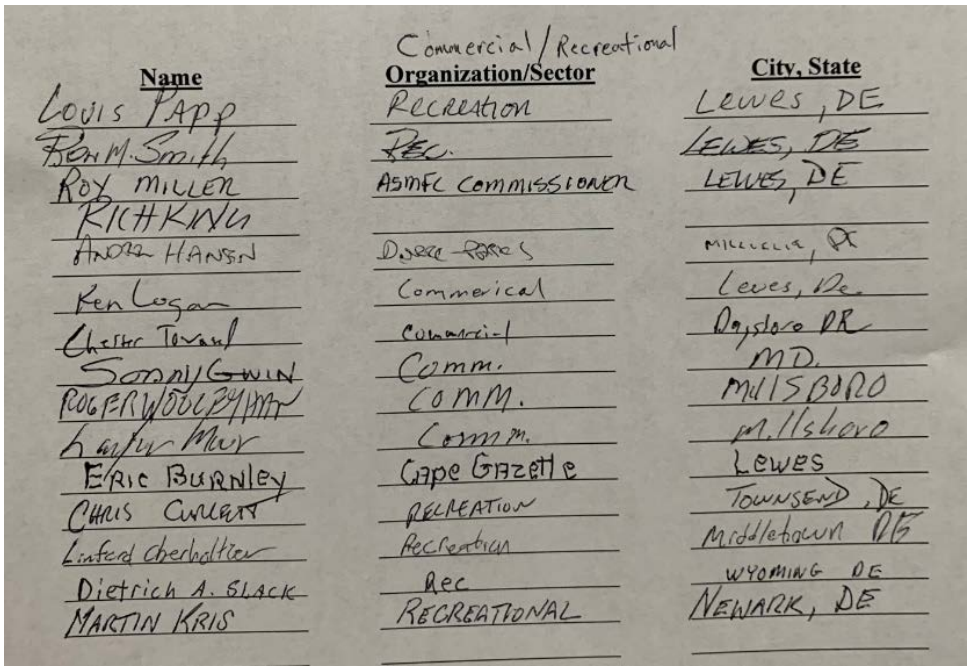
- **David Riback**: Stretch it out to 10 years because a lot of this is environmental. We need to see things improve and we do not want to put people and businesses (e.g. party) through a lot of stressors.
- **Rick Ledtke**: Do a 10-year plan because this is an environmental issue and not due to fishing pressure.
- **Robert Elsey**: Do a 10-year plan because this is an environmental issue and not due to fishing pressure.
- **Paul Haertel**: Do a 10-year plan because this is an environmental issue and not due to fishing pressure. This is going to affect low income families and tourists. We do not want to put measures that are too restrictive.
- **Michael Karch**: Do a 10-year plan because this is an environmental issue and not due to fishing pressure.
- **Sergio Radossi**: Do a 10-year plan because this is an environmental issue and not due to fishing pressure, but really look at the environmental impacts at play.
- **Chris Rainone**: Do a 10-year plan, but this fishery cycles. This may cause issues until we get better data.

Issue 6

- **Victor Hartley**: I would like to see for-hire sector have a separate allocation from the private and shore mode within the recreational allocation. But, also be able to use a size limit which will allow us to get more fish. Also, through using the VTRs.
- **Victor Hartley**: I would like to see the ability to transfer quota from the commercial to recreational sector.

2.3 DOVER, DE

February 19, 2020



Issue 1

- **Sonny Gwin**: Identify a more effective and efficient way to look at comm and rec discards. How do we reduce waste if discard rate is zero?

- **HD Parsons**: Bring the environment into the goals and objectives. Look at the historical weather data. Look at how fish availability has shifted over time. Rebuilding plan is interesting - catch figures should consider weather patterns such as in 2017/2018, which were extremely wet years.
- **Michael Cerchio**: Include how interactions with other species affects abundance of bluefish and other stocks. How are management plans from other species affecting the mortality rate of species we are trying to recover. Need to address the species food sources because species will shift their target food and may affect population structures.
- **Roger** (commercial): Increasing dolphin populations cause declines in bluefish stocks.

Issue 2

- **HD Parsons**: weather and temperature and salinity have caused bluefish to decline and we need better data before we change the allocations (status quo).
- **Sonny Gwin**: status quo until we get better data.
- Michael Cerchio: status quo

Issue 3

- **Sonny Gwin**: status quo until we get better data.
- Michael Cerchio: status quo

Issue 4

- **Sonny Gwin**: status quo on both types of transfers until we get better data. Haven't profited from rec transfer but have from state to state commercial transfers when it comes to commercial fish of different species in different scenarios. Provides economic opportunity for fishermen if it shows up.
- **Michael Cerchio**: status quo on both transfers.
- **Lou**: No transfer from the recreational to the commercial sector.
- **Roy Miller**: No sector transfers while the stock is overfished.
- **HD Parsons**: Keep all the transfers status quo.

Issue 5

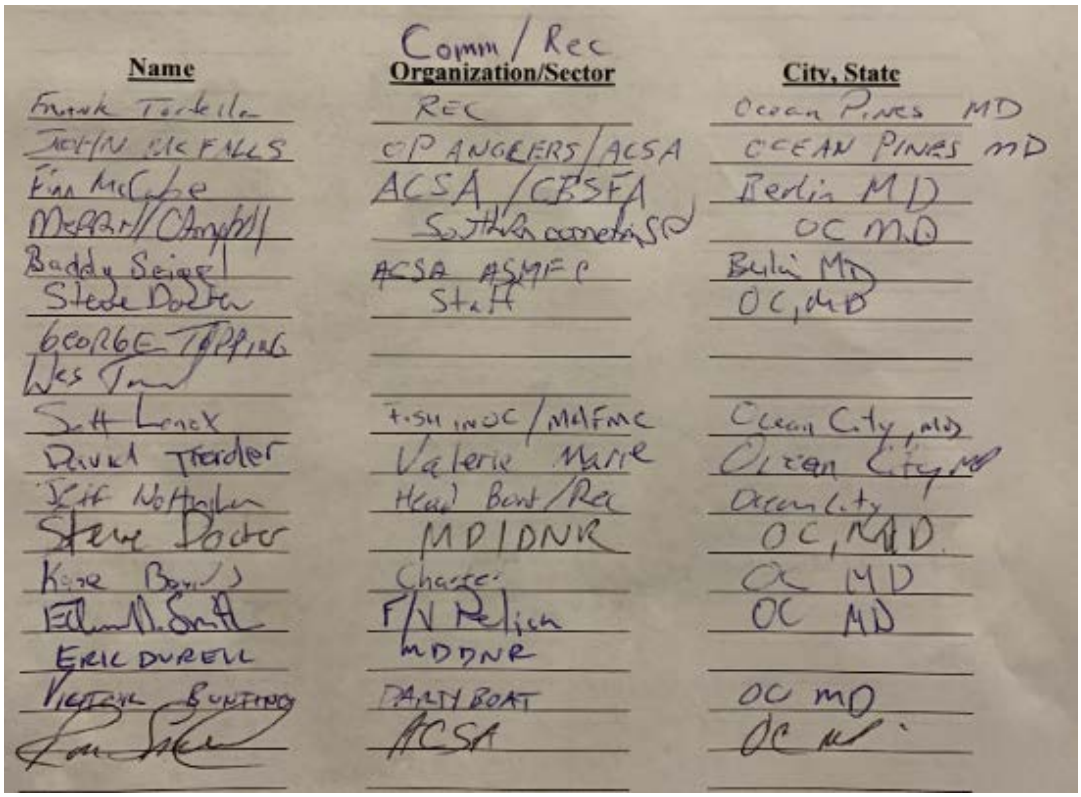
- **Eric Burnley**: To think you can set 10-year plan to recover bluefish is ego times infinity. Bluefish will come back when they come back no matter what you do. The only thing you do when you cut limits on bluefish is make it harder for charter boats in Delaware to make a living. Been around a long time and bluefish come in boom/bust cycles. Cutting bag limit just makes it harder for for-hire - waste of time and energy.
- **Michael Cerchio**: Stretch the rebuilding plan as long as possible (10 years) that allows for annual reviews.
- **Martin Kris**: I look at bluefish as a sport fish or bycatch fish. Bluefish are linked closely with predation, prey, and environmental conditions. There is nothing we can do that is going to fix the overfished status. People are not causing the decline.
- **Roy Miller**: If MRIP was not revised, we may not have the overfished status.
- **Roger** (commercial): Increasing dolphin populations are a major cause of the change in bluefish stock status.

Issue 6

No comments.

2.4 BERLIN, MD

February 25, 2020



Name	Comm / Rec Organization/Sector	City, State
Frank Torbello	REC	Ocean Pines MD
JOHN MCFALLS	CP ANGLERS/ACSA	OCEAN PINES MD
Finn McCabe	ACSA / CBSFA	Berlin MD
Merrell Campbell	Southern coordinator SC	OC MD
Buddy Seiger	~~ACSA ASMFC~~ Staff	Berlin MD
Steve Doctor		OC, MD
GEORGE TOPPING		
Wes Tarr		
Seth Lenox	Fish in OC / MAFMC	Ocean City, MD
David Traeder	Valerie Maine	Ocean City MD
Jeff Nottingham	Head Boat/Rec	Ocean City
Steve Doctor	MD DNR	OC, MD
Kane Bond	Charter	OC MD
Edward M. Smith	F/V Relish	OC MD
ERIC DURELL	MD DNR	
VICTOR BUNTING	DAILY BOAT	OC MD
Tom Sadler	ACSA	OC MD

Issue 1

- **Finn McCabe**: We need to have better accounting on the recreational side and better grasp the changing environmental conditions (shifting temperatures).
- **Merrel Campbell**: Status quo.
- **Edward Smith**: Need to take into account predations and other ocean factors.

Issue 2

- **Merrel Campbel**l: We are targeting other fisheries right now and that is why we don't have a lot of people targeting bluefish. Despite lower ever right now, we do not want to see the commercial allocation go down to 10%.
- **Edward Smith**: If things change with the whelk fishery, we then may have to change to bluefish, and we don't want to find that our quota has been taken out from under us. Bluefin and porpoises are eating bluefish. It is not just humans that are affecting the biomass. There is a large biomass of sharks that are not being kept in check.

- **Finn McCabe**: new MRIP is the problem, point of sale of the license, conduct a survey, we need better data before we alter the allocations.
- **Victor Bontino**: What did other states say? I have a party boat in OC and I've started running bluefish trips, not bsb, curious if they are saying other things, are they actually seeing a decline?

Issue 3

- **Merrel Campbell**: Status quo allocations.
- **Edward Smith**: Status quo allocations. We often give quota to other states, but we want to keep the allocation status quo as a fall back. I think there is less effort coastwide.
- **Finn McCabe**: Reallocate the states that are regularly giving away a lot of quota.
- **Edward Smith**: I agree with status quo allocations for the states. There have been many years where we have been close to our quota, so we do not want to lose any.

Issue 4

- **Edward Smith**: Status quo for the state-to-state and sector transfers.
- **Merrel Campbell**: Status quo for the state-to-state and sector transfers.
- **Finn McCabe**: Status quo for the sec state-to-state tor transfers but fix the allocations so transfers do not always have to occur.
- **Finn McCabe**: No sector transfers until we fix data issues with MRIP.

Issue 5

- **Victor Bontino:** It's hard to comment on this when we don't know what the regulations would be under the plan.
- **Merrel Campbell**: I support constant harvest under the current ABC.

Issue 6

- No comments.

2.5 NARRAGANSETT, RI

February 26, 2020

Name	Organization/Sector	City, State
Frank Blount		
John LaFountain	Fox Seafood Inc.	Narr. RI
Ryan Reynolds	F/V Dreamstar	Wakefield RI
Paul R Johnson	Carol J Chaitas	Wakefield RI
MATTHEW COX	CHARTER CAPTAIN	Wakefield RI

Issue 1

No comments.

Issue 2

- **Dean Pesante** (F/V Oceana, gill netter): Trend has been that bluefish are moving north and while the northern typically do not have issues harvesting their quota, the southern states do. RI's largest challenge is having a small quota and continually having to seek quota transfers from other states. I suggest re-allocating more quota to the commercial sector (commercial is more accountable through reporting).
- **John LaFountain** (Fox Seafood): Agrees with statements made by Dean Pesante.

Issue 3

- **Dean Pesante** (F/V Oceana, gill netter): Suggest re-allocating more quota to the northern states, implementing a minimum size of 18" in the north and 16" in the south (lengths at which 100% of fish are sexually mature), and implement a minimum mesh size for gillnets like RI in all other Atlantic states (could be specific for directed bluefish trips).
- **John LaFountain** (Fox Seafood): Agrees with statements made by Dean Pesante. As a dealer sees the states of NC and VA harvesting a lot of small fish (1.5 to 2 lbs each). Landing 1 million pounds of 1.5-2-pound fish can have a larger impact on the population than landing 1 million pounds of larger fish typical of the northern states. RI has only come in under quota recently due to bad weather. Re-allocate quota to the northern states where the larger, healthier fish are.

Issue 4

- **Frank Blount** (The Frances Fleet): Maintain the sector transfers.

Issue 5

No comments.

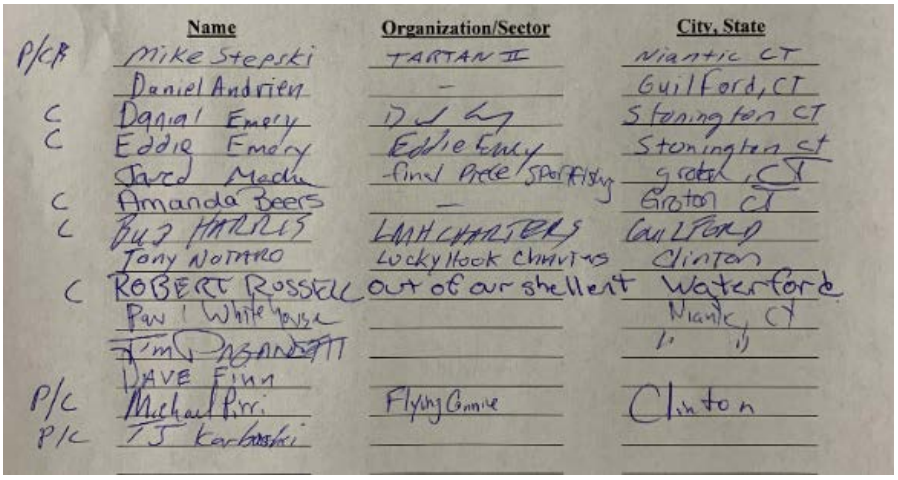
Issue 6

- **Paul Johnson** (Carol J charters): Decisions should be made with data that involves hard numbers submitted, not estimates. Should separate for-hire as its own sector.
- **Frank Blount** (The Frances Fleet): I support sector separation. The shore mode is extremely important as 1st bluefish experience.

Intentionally left blank

2.6 OLD LYME, CT

February 26, 2020



	Name	Organization/Sector	City, State
P/C	Mike Stepski	TARTAN II	Niantic CT
	Daniel Andrien	–	Guilford, CT
C	Daniel Emery		Stonington CT
C	Eddie Emery	Eddie Emery	Stonington ct
	Jared Medu	Final Rate Sportfishing	groton, CT
C	Amanda Beers	–	Groton CT
C	BUD HARRIS	LMH CHARTERS	Guilford
	Tony Notaro	Lucky Hook Charters	Clinton
C	ROBERT RUSSELL	out of our shell rest	Waterford
	Paw ! White House		Niantic, CT
	TIM [illegible]		1' 1)
	DAVE FINN		
P/C	Michael Pirri	Flying Gannie	Clinton
P/C	TJ Karbowski		

Issue 1

- **TJ Karbowki**: MRIP numbers are made up fake data. Biologically, small (harbor) blues eat small bait, large bluefish eat bunker. Lately, we have had an absence of large bluefish, but the small harbor bluefish follow clouds of bait. This fish disappearance lines up with omega proteins in the Chesapeake Bay. Consider adding issues with bait and aspects of ecosystem-based management to the FMP goals and objectives.
- **Mike Pirri**: Revise the FMP goals and objectives to reflect acquisition of better data.
- **Ed Emory**: The FMP goals and objectives need to emphasize better monitoring and take into consideration movement of bluefish and baitfish.

Issue 2

- **TJ Karbowski**: Status quo allocations until new data is used. We need something better than the "new" MRIP numbers.
- **Bud Harris** (comm): Status quo allocations. We do not want to see a reduction in the commercial quota.
- **Mike Pirri**: There has to be tons of dead discards that are killing our stock. How is a reduction in limits going to prevent overfishing? We need to keep managing by weight and not by numbers of fish.

Issue 3

- **Ed Emory**: We need better monitoring.
- **Bud Harris** (comm): Status quo on allocations.

Issue 4

- **Bud Harris** (comm): Status quo on state to state transfers, as states should give and take.

Issue 5

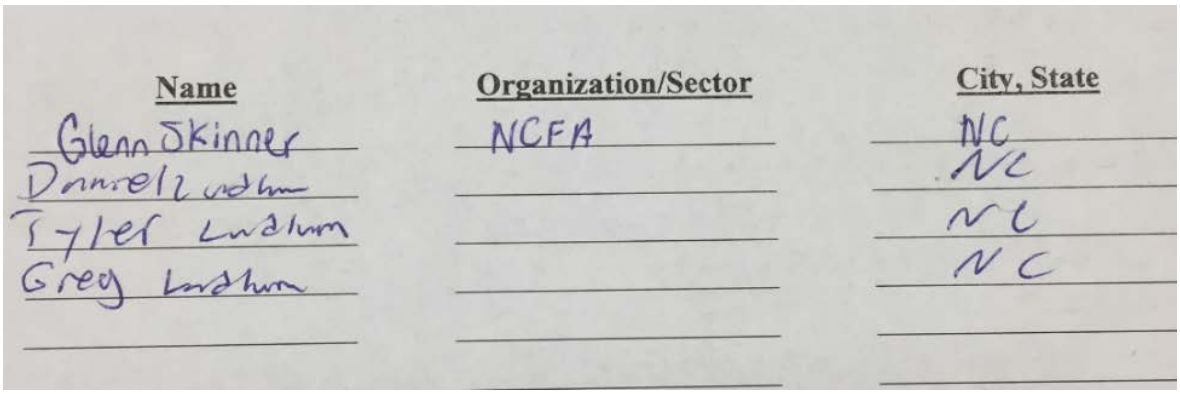
- **Mike Pirri**: Initiate the rebuilding plan by weight and not numbers of fishto include shore estimates of snappers. I support a ten-year rebuilding plan but would like to see the target/threshold lowered because the amount of harvest estimated by MRIP is not occurring. We want to get people out on our for-hire boats, its perception, we are not keeping that many fish.
- **Ed Emory**: We need better monitoring. I support the review of a variety of rebuilding plans (different durations). When we did rebuilding for groundfish we were cut 90%. Giving 3, 5, 7 years is generous, and I want to applaud that.

Issue 6

- **TJ Karbowski**: I support separate for hire regulations. On the recreational side you do not know if you should tell the truth. If you day that you had a good day, they are going to tell you that you are overfishing. If you say you had a bad day, they will say you previously overfished. So, these surveys are not accurate.
- **Mike Pirri**: Separate the for-hire sector from private recreational and shore modes.
- **Ed Emory**: It seems as if there is no monitoring on the for-hire sector.

2.7 MOREHEAD CITY, NC

February 27, 2020



Name	Organization/Sector	City, State
Glenn Skinner	NCFA	NC
Donnie Ludlum		NC
Tyler Ludlum		NC
Greg Ludlum		NC

Issue 1

- **Glenn Skinner**: Do we have any better understanding of the stock status today then back in 1990? Seems like objectives are sometimes put in place but not accomplished. Need to focus on preventing overfishing while also minimizing waste—especially as the stock is rebuilt. We also need to maintain our flexibility when it comes to transferring quota. Flexibility should be included in the objectives.
- **Greg Ludlum**: Felt we haven't made access to bluefish equitable to all fishing sectors. Include an objective to provide equity among user groups.

Issue 2

- **Glenn Skinner**: As long as we maintain the ability to transfer from quota from the recreational to commercial sectors and from state to state, then there is no need to revisit this. Current allocation in

FMP is pretty close to harvest percentages between commercial and recreational fisheries using revised MRIP estimates.

Issue 3

- **Glenn Skinner**: Recommended to keep the current base years for the use of state by state allocations. Nobody will like the current reductions but as long as we allow the transfer from state to state he was comfortable with how they are now. Maybe revisit allocations after stock is recovered. Seasonal or coast wide allocations won't necessarily prevent fish being caught in one place more than another.

Issue 4

- **Glenn Skinner**: Really likes this flexibility—it allows the Bluefish FMP to account for annual variable distribution of bluefish.

Issue 5

- **Greg Ludlum**: Noted that if we continue to decrease the bag limits then we will adversely impact the fishing piers. Appropriate length of the rebuilding plan will depend on the regulations in place.
- **Glenn Skinner**: He couldn't make any suggestions without knowing what the specific measures would be to shorten the rebuilding period. Need to consider economics and dead discards when setting the length of the rebuilding plan. Need to figure out how to manage the open access recreational fishery to prevent excess waste, which could result in a discard fishery during the rebuilding period, which has happened for other species.

Issue 6

- **Glenn Skinner**: Important to maintain as much flexibility as possible for quota transfers and to minimize waste. Need to consider equitability for the different user groups in the commercial and recreational fisheries.
- **Greg Ludlum**: Keep in mind that fishing piers serve as an access point for fishermen who can't easily use guide boats or the beach, such as the disabled and elderly. Also, keep in mind that piers play a significant role in the community.

Intentionally left blank

2.8 STONY BROOK, NY

February 27, 2020

SIGN-IN SHEET

NAME	AFFILIATION	EMAIL ADDRESS	PHONE
NEIL DELANO/	CAPTREE BOATMEN'S ASSC.	NDELANO/@AOL.COM	631-560-6925
VINNIE CATALANO		VINCENT.CATALANO@SIEMENS.COM	516 924 2913
Ken Higgins	Captree Pride Captree Princess	captainkenhiggins@yahoo.com	631-848 665 7
Richard Jensen	North Fork Capts	NANCYANNCHARTERS@YAHOO.COM	631-744 5580
Phil KESS	FISHY BUSINESS CHARTERS	PKESS@OPTONLINE.NET	516-316-6967
ARTHUR KRETSCHMER	LISLA	arthur.fl(KRETSCHMER)gmail.com	631 387 2533
Ed Mlodynia		EEMlodynia@yahoo.com	631-968-5117
John T. MLODYNIA		JohnmloDynia@Gmail.com	631-543-5346
TOM VINCENT		DUCKISLANDMARINE@GMAIL	631 275 4248
Brian Culhane		brianculhane@verizon.net	516 449 7250
Bob Slade			631 804 7833
AL Schaffer			631 236 8778
Greg DiDomenico	GSSA		
Richard Cornell	Fish on fishing	cornellRichard60@gmail.com	631-655-5918
NANCY SOLOMON	LI TRADITIONS		516-767-3803

NAME	AFFILIATION	EMAIL ADDRESS	PHONE
STEVEN CANNIZZO	NY RFHFA	mb1143f@gmail.com	
Anthony Testa	NY RFHFA	nyrfhfa@gmail.com	
FRANK MORELLI	NY RFHFA	bluefish1260@aol.com	
Victor Vecchio	NOAA FISHERIES	victor.vecchio@NOAA.GOV	
JAMES SCHNEIDER	NY RFHFA	run4fish@aol.com	
PETE LAUDA	NY RFHFA	BLUELOBSTER8@HOTMAIL.com	
Joe Locascio	NYRFHFA	Jlocascio321@aol.com	
STEVEN RWITHERBEE	Chamber / Mon Mark	SSeaBee@aol.com	
JOHN D'IORIO	NONE	binary2@optonline.net	
DAN SULLIVAN	NONE Rec-Fishing		631-585-9990
MARK CUSUMANO	COMMS	MARKCUSUMANO@GMAIL.COM	
JAMIE [illegible]	Miss Montauk	captJamie@MissMontauk.com	
Paul Cicalese	—	PDNO 1406 yahoo.com	
Tom Cuozzo	Simple Life	Simple life charters@gmail	
Anthony Cuozzo	Miss Montauk	anthony.cuozzo@yahoo.com	

NAME	AFFILIATION	EMAIL ADDRESS	PHONE
JOSEPH DEFALCO	NOAA	NANASTY26@YAHOO.COM	
John Maniscalco	NYSDEC	john.maniscalco@dec.ny.gov	
CHARLES WITEK	—	charleswitek@gmail.com	
Bob Danielson	NYSF	surfrat1@optonline.net	
Steve Heins	MAFMC NY	steveheins.ifish@gmail.com	
JAMES FOLEY	HAMPTON LADY	JFOLEY77@GMAIL.COM	631-521-3366
Pat Augustine		Pamgustine3@verizon.net	631 928 1524
Ken Hejducek			
Joe DeVito	Laura Lee Fleet		
Robert Andersen	Captree Princess - Captree Ride	RRJCP1@AOL.COM	631 4046817
Mark Harrington	Newsday		
Paul Risi	KINGSBOROUGH COLLEGE	PAUL.RISI@KBCC.CUNY.EDU	
Mark Woolley	Congressman Zeldin	mark.woolley@mail.house.gov	631-289-1097
Nick marchetti			
Bryan Soriee	Island Princess	Cptbryan@gmail.com	631-587-6024

Comm/Rec

Name	Organization/Sector	City, State
Frank Schwartzer	LIBBA	
Ronald DiCostanzo	WHSC	Commack NY
TOM FARRELL	MSA (MONTAUK SURFCASTERS ASSOC.)	BAYPORT N.Y.
Ken Conlon	Commercial	Rocky Point, NY
Joseph Gottheimer	LIBBA / REC	Center Moriches, NY
Emerson Hasbrouck	ASMFC - Sec. Appt.	

Issue 1

- **Jamie** (Miss Montauk): Include aspects of predation into the FMP goals and objectives.
- **Bob Danielson**: Ensure the snapper fishery is available for the kids and focus on ecosystem-based management.
    - Put a min size limit (12") for anyone that needs a rec fishing license – let kids have a bag limit and no size limit.
    - Young of the year bluefish congregate; we need to think about how they are going to survive in polluted water.
- **Fred** (no last name): snapper fishery is critical for kids and tackle/bait shops and should be preserved through the FMP goals and objectives. We need to combine a size limit and reduction in season (wave 6) to get the bag limit up for perception to clients.
- **James Schneider**: Introduction of farmed salmon hurt commercial bluefish. Snappers are only available for 6 weeks. Outreach on proper handling should be added to the FMP goals and objectives.

- **Charles Witek**: Only federal fishery north of Cape Hatteras that is predominantly recreational catch and release. Most fish kept are under 12". Goal 2 of the FMP goals and objectives: highest availability of bluefish - This fishery should be managed as a catch and release fishery. In a release fishery you are managing for abundance and sometimes size. Goal 5 of the FMP goals and objectives: delete recruitment from :recruitment overfishing" because we do not want growth overfishing.
- **John Mlodynia**: Discuss the snappers within the FMP goals and objectives.

Issue 2

- **Bob Danielson**: Once the quotas are set, let them be.
- **Dan Sullivan**: Recreational fishermen will never meet the 83% because they are releasing fish.
- **Joe Gittleman**: Status quo on allocations. Commercial fishing is driven by sales and they have not come close to the quota. I disagree that recreational bluefishing is a catch and release fishery. On party/charter vessels, fish are treated very poorly and there is a tremendous amount of discard mortality. I have seen gaff and release - they do not survive.
- **James Schneider**: I support status quo allocations. The fishery is completely unutilized. There are only two party boats on long island that target bluefish. This is not an allocation issue. Waste is now a non-issue, and this is not a recreational overfishing activity. The issue is with the environment. Everyone on both sides of Long Island are striper fishing and other fish; there is no recreational pressure on bluefish. It is not like the old days you hear about. Occasionally, some are bled and thrown in a cooler.

- *Prefer status quo (by a show of hands): ~15 individuals.*

Issue 3

- **James Schneider**: There is not much commercial interest in bluefish anymore. They are not targeted as much and are often bycatch. Pressure for both sectors has gone down because the desire to eat them has gone down. I prefer status quo allocations.
- **Mark Cusumano**: I support reallocation by states with an updated time series, especially since NY often meets the state allocated quota.
- **Al Schaefer** (Montauk): Reallocate quota to make the NY commercial quota higher and avoid the need for transfers.

- *Prefer status quo (by a show of hands): ~15 individuals.*

Issue 4

- **Bob Danielson**: I support the commercial state-to-state transfers, but do not support the sector transfer. Set a quota and let it be.
- **Dan Sullivan**: I do not support the sector transfer because recreational fishermen are releasing large numbers of fish and do not want to see those released fish transferred to the commercial sector.
- **Charles Witek**: I oppose transfers on an annual basis by sector. The transfer demonstrates a misunderstanding of the use. We are releasing them to maintain abundance, not so another sector could catch them.
- **Mark Cusumano**: Has the recreational sector historically met their RHLs? There have been reductions in quotas in NY, and we rely heavily on the sector transfers. I support status quo commercial state to state transfers.

- *Prefer status quo for both types of transfers (by a show of hands): ~15 individuals.*

Issue 5

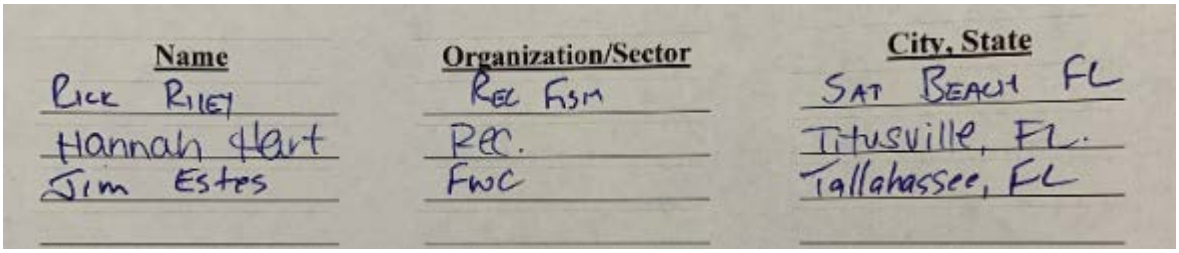
- **James Schneider**: Rec fishing is not what caused the overarching decline to overfished status.
- **Ken Hejducek**: Bob Danielson: Make the rebuilding plan as short as possible.
- **Bob Danielson**: Make the rebuilding plan as short as possible.
- **Mark** (no last name): We rebuilt seabass and did not see an increase in quotas. So, I am in favor of stretching the rebuilding plan to 10 years.
- **James Schneider**: You need better data before you can initiate a rebuilding plan and to reevaluate if the stock is even overfished.

Issue 6

- **Steve Cannizzo**: I would like to see recreational bluefish management measures evolve into a 7, 5, 3-bag limit, similar to that of blueline tilefish. This should be sustainable because the for-hire sector is responsible for <5% of the overall recreational landings (in recent years).

2.9 MERRITT ISLAND, FL

March 2, 2020



Name	Organization/Sector	City, State
Rick Riley	Rec Fish	Sat Beach FL
Hannah Hart	Rec.	Titusville, FL.
Jim Estes	FWC	Tallahassee, FL

No comments – Attendees noted that written comments will be submitted.

2.10 FORT MONROE, VA

March 2, 2020

Name	Organization/Sector	City, State
Tom Powers	Recreational	Poquoson VA.
Jeff Deem	Rec	
Jim + Kate Dawson	Comm	Chincoteague

Issue 1

No comments.

Issue 2

- **Tom Powers**: I believe it is reasonable to revisit the allocation if we believe the MRIP data, but I question the MRIP data. I would prefer staff use a 3-year average to make regulatory decisions.

Issue 3

- **Tom Powers**: I would prefer staff use a 3-year average to make regulatory decisions.
- **Jim Dawson**: There is a large commercial fishery, but often, these fisheries are moving further offshore.

Issue 4

- **Tom Powers**: I would prefer staff use a 3-year average to make regulatory decisions. Also, the commercial fishery may be happy with 5-6 lb fish, but the recreational fishery wants to catch 20lb fish that make the drags scream. Furthermore, responsible recreational fisherman will keep two fish because bluefish don't keep well. Recreational anglers are conservation minded and they want a quality fishery, not a quantity fishery. When you go for maximum sustainable yield and then transfer quota that the recreational fishery is allocated, but not catching to the commercial sector, you drive down the quality of the fishery which makes more and more recreational fishermen not want to go out.

Issue 5

- **Tom Powers**: I would prefer staff use a 3-year average to make regulatory decisions.

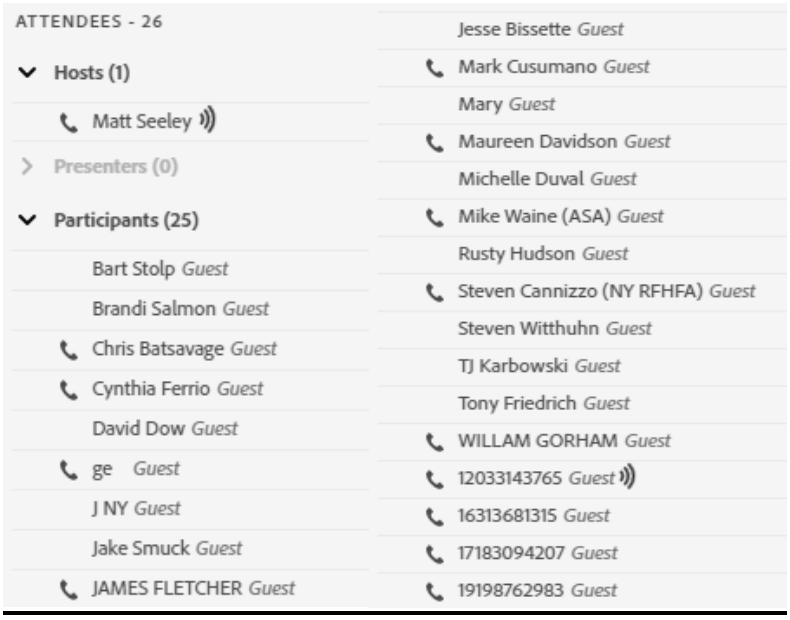
Issue 6

- **Tom Powers**: There is something going on with the migration I believe part of it is a food source issue, but that is an ecosystem management issue, and I don't believe they're going to get into that with this fishery. Also, I would suggest when staff look at options for reductions that they look at current years because the fishery is failing and not go back but so far or at least do an analysis comparing 10 years and 3 years to current regulations. So, reductions are meaningful so we can have the fishery recovery better and have then come back in shore and hopefully we can all be happy with that.
- **Jim Dawson**: I believe bluefish migration patterns have changed and that is why we no longer are seeing them in the same abundance. I also feel as though climate change, not food availability, and perhaps something else is driving them or forcing them offshore. I think they have enough food. I'm seeing the small fish inshore, but the big fish are further offshore. They used to come inshore, but do not do that anymore.

Intentionally left blank

2.11 INTERNET WEBINAR

March 4, 2020



Issue 1

- **James Fletcher**: Please use total discards in the future instead of just dead discards. Understanding the stock – there is a stock of bluefish off Africa. It seems to vary with our stocks. Reduce the waste in the fisheries through the use of barbless hooks.
- **TJ Karbowski**: Add protection for the for-hire sector to the FMP goals and objectives. MRIP needs to be further reviewed.
- **Bill Gorham**: Emphasize that this fishery is very important to the shore fishermen. Ensure these goals and objectives are actually achievable.
- **Bonnie Brady**: Ensure that concerns with MRIP do not negatively affect the commercial sector.

Issue 2

- **James Fletcher**: We need to switch the allocation quickly to allow stock status to go up.
- **Glen Evans**: We should use a more recent time series.
- **Bonnie Brady**: Need to use data when allocations were set with no management occurred (1981-1989). Data was taken from landings data (1981-1989) when no regulations were involved. I am confused how data with hard TACs on the commercial and recreational end has had suggestions and seasons, but not a hard stop. Then, how could you use landings data when one side (commercial) is held to a hard quota and the other (recreational) is not. In summary, the commercial data has been restricted to a specific quota and then pound for pound paybacks. I do not see how you can use any other time series that includes regulations that restrict fishing.
- **Rusty Hudson** (DSF): We want no allocation percentage shift with the rebuilding plan. Plan on the same percentages, but a different ABC is the obvious answer to me. Do not damage the commercial industry using a census to monitor the commercial catch by using an estimate to monitor the recreational catch.

Issue 3

- **Mark Cusumano**: Would like to see reallocation occur between the states. New York consistently requests transfers and to avoid this, we would like to see New York have a higher commercial quota.

Issue 4

- **TJ Karbowski**: Recreational fishermen do not want to fight with commercial fishermen. I propose we allow quota transfers from the commercial to the recreational sector if it is going unused.
- **Bonnie Brady**: We need to switch the allocation quickly to allow stock status to go up. Or, allow transfers to go from sector to sector, quickly. Commercial sector wants to see the transfers continue. This is very important for the state of New York.
- **James Fletcher**: Allow transfers to go from sector to sector.
- **Steve Cannizzo**: We need rollover between the two sectors that allows for back and forth transfers, as necessary. This could be in the form of an allowance (potentially different than sector separation).

Issue 5

- **TJ Karbowski**: People do not support MRIP and have no confidence in the new estimates. How are you supposed to choose a rebuilding plan option when we cannot believe any of the estimates? Also, I have never been interviewed by MRIP.
- **Steve Cannizzo** (NY RFHFA): I think it is very dangerous to deal with rebuilding plans that are very short. The bluefish stock has the propensity of disappearing for unknown reasons and then randomly coming back. We need to have a high abundance level. I would highly recommend extending the rebuilding plan to 10 years or as long as possible.
- **James Fletcher**: A rebuilding plan of 5, 7, and 10 years does not fit into the cyclical patterns of bluefish. We need better data before we can initiate a rebuilding plan.
- **Mark Cusumano**: Stretch out the rebuilding plan to 10 years. Also, we should have some dynamic options throughout this rebuilding plan. We want to ensure that certain percentages of fish are going to come back to us once the stock is rebuilt. For example, when the stock starts to rebuild, a percentage of quota should be returned to the sectors to so we can continue to fish. We need to take a dynamic approach.

Issue 6

- **TJ Karbowski**: Add for-hire sector separations and/or rollover between the two sectors that allows for back and forth transfers, as necessary. This will create incentive for potential clients. People need to feel that for $1,000 they are getting what they paid for, but we need to be careful with reporting through apps because there are many ways people can false report and interrupt other individual's ability to access a permit. Many of these issues can not be revised at the current stage because we have no faith in the MRIP numbers. Also, I have conducted thousands of recreational trips and have never been interviewed by MRIP.
- **James Fletcher**: We need electronic reporting (cell phone) on all fisheries in the EEZ. Until we get better data, we need recreational fishermen to report electronically. Also, if we used barbless hooks and had no dead discards there would be no issues here. We need to come at the issues from a different perspective and start to actually make some changes.

- **Steve Cannizzo** (NY RFHFA): Develop a program where anybody who wants to engage in catching bluefish has to dial in and note they are fishing. This could drastically help by honing in on an effort component within the fishery. This could be developed so in individual states can collect better data. Comment related to effort. Most important thing about tonight has to do with MRIP. Additionally, we need sound data for our assessments and MRIP is not currently providing what we need. Lastly, we need rollover between the two sectors that allows for back and forth transfers, as necessary. This could be in the form of an allowance (potentially different than sector separation).
- **Bonnie Brady**: There are ways to understand size by taking a photo through an app. This would be very useful for many of our fisheries.
- **Glen Evans**: No one agrees with the MRIP estimates. Also, reporting through an app would be much more effective than our current approaches to monitoring.

3 WRITTEN COMMENTS

All written comments are listed alphabetically by the commenter's or organization's first name. Each comment was provided via the online portal (www.mafmc.org), email, or mail/hand delivered. Comments are as follows:

From: Glnn: <cristori@aol.com>
Sent: Tuesday, March 17, 2020 8:26 PM
To: Seeley, Matthew
Subject: Comment relating to Bluefish Scoping Hearing

As a member of the original Mid-Atlantic Council, I fought to add bluefish to the species managed. There wasn't initially much support in those days for managing a species so abundant, but a huge catch by a tuna seiner and reports of a foreign market being a possibility changed perceptions of the fishery. Anglers packed public hearings, and a good management plan went into effect.

A great change occurred after that was accomplished as recreational fishermen who used to keep every bluefish became more aware of conservation. In a relatively short period of time, anglers began releasing many more blues than they kept -- and that trend has increased over the years. As a result, anglers were building up a conservation reserve to hopefully ensure good bluefising in the future even for a species which had been cyclical in the past.

With the market providing relatively low prices for commercial fishermen, there wasn't very much pressure on the fishery. Unfortunately, with anglers not filling their quotas due to all the releases, management started transferring that conservation reserve to commercial fishermen even though there was no provision for that in the plan.

Now bluefish have been declining for years and the market price has been increasing to provide an incentive for catching as many as possible. Party and charter boats have been going out of business, and will be further impacted by the new regulations that will discourage patronage from Pennsylvania fishermen who want a volume of fish.

The transfer of recreational quota to commercials never should have happened, and must be specifically prohibited by amendment to the management plan to be sure it will never happen again. There are many factors involved in the bluefish decline, but it's certain that we could have used the reproductive potential of all those blues that were eliminated needlessly by management that should be practicing conservation of a vital public resource.

Al Ristori
Wall, N.J.

THE SALTWATER RECREATIONAL FISHERY IS DYING

February 18, 2020

The recreational fishery is dying a slow death. Not because of economic or social actions, but because the National Marine fishery Service (NMFS) is gradually decreasing the amount of fish we are allowed to catch. Seasons have been shortened, possession amounts decreased, and fish size increased. The NMFS obviously concerned in protecting and expanding the commercial fishery at the expense of the recreational fishery.

Bluefish possession cut 80%. In 2019, the allowable catch for the recreational sector went from 80 to 66% and commercial went from 20 to 34%. If the fishery is in such dire trouble why not decrease the allowable catch equally?

Black sea bass allowable catch increased 59 percent for the commercial and *no* increase for the recreational side.

Summer flounder quota increased by 49 percent for the commercial and again nothing for the recreational allocation.

Striped bass cut 50%

Attached you will find an article written in 2017 by Captain Bob Bogan from the party boat Gambler that illustrates the economic impact caused by NMFS. More than 50 for hire party boats that carry more than six persons have gone out of business. Also attached is a comparison of the 1997 regulations as compared to 2019.

Alan Kenter

kingofbdock@aol.com

Title: Fishing Community Is in Dire Trouble!!
Post by: Capt Bogan on May 30, 2017, 11:05:42 AM
Party Fishing Vessel and Charter fishing vessels that carried more than 6 passengers --Businesses that have Gone Under in New Jersey (not replaced) since the Bad Reauthorizations of Magunson-Stevens in 1996 and 2006.

Bayonne--- --- --- --- ------ ---- -Bucky

Perth Amboy--- -- ----- - -- -- -Sea Pigeon

Leonardo----------Freddy C

Highlands------ --- ----- - --- - -Crack-a-Dawn
" "-- ---------- - -- - --- -Eagle
" "--------- ---'---- -- -- ---Jersey Girl
" "----------Ranger

Belmar----------Catherine II
" "----------Mohawk Explorer
11 "--- - ------- ---- - ---- - -Mohawk IV
" "----------Eileen
11 "--- -- -- -- ----- -- -------Ginny Lynn
11 "----- -- -- -- ------ - --- -- American Eagle

Brielle- ----- ------- ----- -- -- - -Atlantis
" "----------Capt Ke!

Point Pleasant----------Norma KII
" "------- --- ------- -----Miss Norma K
" "---------- ----------Deep Adventures III
" 11 ---------- -- --- -- -----Deep Adventures IV
11 "------- ------ ------- --Sea Devil
" "----------'---Cock Robin

Barnegat ------- -- - ---- -- -- --White Star
" 11 - - -- - - - -- -- --- -- - - - -- -Miss LBI
" "----------Doris Mae
11 "-- ---- -- ----- --- ----- -Searcher
11 "- - ---- ----- -- --- ----- -Jersey Devil

Atlantic City---- --- -- ---- -- -Capt Applegate

Sea Isle City - --- ----- -- -- -- -Capt Robbins
11 " - -- -- -- --- ---- --- -- -- -Miss Ocean City
Fortesque---- ----- ---- --- --Angler
Cape May- - -- -- --- -- -- - - --- Mid 90's: 29 party boats----Currently: 3 party boats

During Same Years, new to the industry :
Perth Amboy --- - -- -- -- - - - -- Sea Hawk (for sale?)
High Lands----------Dorothy B (transferred from NY)
Pt Pleasant----------Voyager

This is a count of more than 50 once viable businesses, that are gone for good (in NJ alone). This is NOT anecdotal information. These were US Coast Guard, federally documented vessels. NMFS wants us off the ocean --they have done a good job. Fisheries management has been hi-jacked by special interest groups that are making money by putting us out of business. They are penalizing fishermen on fish stocks that are rebuilt as high as 300%! Summer flounder biomass stock rose from 35.9 mil lbs in 1995, to 88.9 million lbs by 2014 (more than double) --this was achieved through our sacrifices --not fisheries management (who I've heard get paid $400 plus per-day, put up in a fancy hotel, all expenses paid, for their time at the meetings.)
The Original intent of Magnunson Stevens was good: Increase fish stocks and maintain a viable fishing community through sound fisheries management. This is no longer the case. Fishing communities no longer matter.
Above is only a list of larger recreational for-hire fishing charter and party boat businesses that have disappeared since the Magnunson-Stevens reauthorizations of 1996 and 2006. It does not include family run tackle shops and fishing marinas and boat rental marinas --and all the residual loss of business that has suffered under the inequity of these unfair fish rulings.
And would be improbable to estimate the numbers of a whole generation of lower-income people who have given up -- or not even learned-- saltwater fishing due to the fact that the cost doesn't warrant --no chance of bring home dinner.
Fisheries management has successfully divided and conquered fishermen; from Recreational vs Commercial, private boat vs for-hire boat, State against State, beach fishermen vs boat fishermen. All the while, the enviro-industry (and make no doubt, it is a money making industry) are laughing all the way to the bank. Behind doors, these same people are earnestly working to create Marine Sanctuaries to further restrict our... "Liberty and the pursuit of Happiness", (which was our unalienable right, spoken of in the Declaration of Independence).
If you look at the lobbyist, Marine Fish Conservation Network, for example, you will see a wolf in sheep's skin; Pretending to be concerned about fishing communities. MFCN is on Capitol Hill, lobbying to put a stop to any bill that would introduce common sense flexibility into our fisheries management. 200 organizations are represented and many individuals contribute to the MFCN lobby business, thinking they are helping us, not realizing they are in truth, working against us. Other lobby groups with deep pockets: Environmental Defense Fund, PEW Trust Fund, PETA and many more.
During this same 20 year period, marine estuaries (according to NOAA, 2/3 of all marine life begins in the estuary) continue to be built upon --and polluted into --and beach replenishment continues to ruin marine habitat by stealing sand from underwater hills and ridges and pumping into onto the beaches, only to get washed away during the next storm. (It's a shame that govt continues to use the tax money of hard working people to dump marine habitat onto the beaches, yet access for surf fishermen continues to be diminished.) It seems the enviro-industry has kept most quiet about this because I guess they are okay with replacing fishing communities with condos and sail boats.
The Axe needs to be laid to the root. Magunson Stevens needs to be fixed --returned to its original intent. If our Fisheries Management Council is not going to stand up for our fishing communities, we must do our part by reaching our representatives. Send an email --make a call - use social media: facebook, twitter, ect. Information on how your rep can be reached has never been easier. You do not need to be eloquent, you don't need to be long winded, you only need to let your reps know how the fisheries system is broke and that Magnunson Stevens needs to be fixed before our fishing communities are solely given over to the elite.
Support Bill HR 200 and HR 2023.
Our Representatives in NJ and NY have been very quiet on these two bills --They need to wake up. I urge you to rattle their cage.
If you fish, please, "do not go quietly into that good night." (T.Dylan)

1997 NJ Fishing Regs ** 2019 Fishing Regs in Red

Summer flounder--35.9 mil lbs bio stock in 1995- - -88.9 mil lbs in 2014* 14.5" no close, 10 fish limit
18" May 24-Sept 21 18" Commercial quota increase 50% recreational - none (0%)

Black Sea Bass-stock rebuilt 229%- not over fished-overfishing not occurring* 9" no close-no limit
10 fish May 15-June 22 12.5" Commercial quota increase 59% - recreational - none (0%)
2 fish July 1-August 31 12.5"
10 fish Oct 8-31 12.5"
15 fish Nov 1- Dec 31 13"

Scup (Porgy) stock rebuilt 300%
No size no close no limit
50 fish 9"

Winter Flounder
No limit Mar 1-May 31 Sept 15 - Dec 31
2 fish March 1- Dec 31 12"

Bluefish
1O fish limit No size or close
3 fish private, 5 fish charter and private boats

Weakfish
14 fish no close 14"
1 fish 14" no close

Tautog
No limit no close 13"
4 fish Jan1 Feb 28 15"
4 fish April 1- April 30 15"
1 fish July 17- Nov 15 15"
5 fish Nov 1-Dec 31 15"

Cod
No limit no close 19"
No limit no close 21"

Striped bass
2 fish , no close 28"
1 fish 28-35" (proposed)

River herring
No limit no close no size
Closed to recreational fisherman

* information received from NMFS

From: Alexander Spindelman <a.spindelman@gmail.com>
Sent: Friday, March 6, 2020 8:08 PM
To: Seeley, Matthew
Subject: Bluefish scoping comments

Hi there, I just wanted to let you know that my fishing club takes regulation and wildlife conservation very serious. I was sent emails telling me about meetings, discussions and decisions all the time. Though I am younger then most anglers, (30 years old), I am old enough to have educated opinions on matters. I LOVE THE NEW BLUEFISH REGULATION. It can not be easy cutting fish quotas especially when people may not like then. But it's commerical fishermen and as well as recreational fishermen who have DESTROYED fishing populations. I have seen gross violations of the laws since I was a child. I hope my children will one day be able to enjoy fishing like I have. Keep doing what is right, not what's popular

March 17, 2020

Dr. Christopher Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE 19901

Dear Dr. Moore,

The American Sportfishing Association (ASA) appreciates the opportunity to provide comments to the Mid-Atlantic Fishery Management Council on the bluefish allocation and rebuilding amendment to the Bluefish Fishery Management Plan.

ASA is the nation's recreational fishing trade association and represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 49 million recreational anglers. ASA also safeguards and promotes the social, economic, and conservation values of sportfishing in America, which results in a $125 billion per year impact on the nation's economy.

As a sportfish, bluefish are a critical component of the Atlantic coast recreational fishery creating significant economic benefits to our industry and bringing considerable value to a diverse angling community. The 2019 operational assessment results concluded that bluefish were overfished, but overfishing is not occurring. These results were based on the inclusion of updated MRIP catch data which ASA, other stakeholders, and state agencies have expressed concern with using without further review and validation.

For example, it is difficult to understand that over the entire time series (1985-2018), bluefish spawning stock biomass (SSB) has never reached the SSB target. ASA of course values the health of the bluefish stock and understands that rebuilding it higher than its current level has measurable benefits to our industry, but it is truly difficult to understand that our rebuilding target is something that we have never achieved in the last 33 years. We recommend that the SSC further discuss this matter to assist the council and stakeholders in providing further input on an adequate rebuilding timeframe for this important sportfish.

ASA also offers the following recommendations on the issues outlined in scoping document.

<u>Issue 1: Goals</u>
The MAFMC is correct in managing this species primarily for the recreational sector, defined as the commercial fishery not exceeding 20% of the total catch, and that should remain as a central goal in the FMP. As with all species managed primarily for the recreational sector, bluefish should be managed for maximum practicable abundance.

We also recommend adding objectives to the FMP that better reflect the value of bluefish to the recreational fishery. Being a largely catch-and-release recreational species, many more fish are released than are landed, yet typical fisheries management only assigns value to landed fish. We believe an objective of the FMP should also include the intrinsic value of a recreationally released fish.

AMERICAN SPORTFISHING ASSOCIATION
1001 N. Fairfax Street, Suite 501, Alexandria, VA 22314 • 703-519-9691 • Fax: 703-519-1872
Web: www.ASAFishing.org • Email: info@ASAFishing.org

Additionally, bluefish has been a relatively stable fishery throughout its management history, and we recommend that maintaining that management stability should be an added objective of the FMP.

Issue 2: Commercial and Recreational Allocations

Setting allocations using just landings histories (the current scoping document makes no mention of any other allocation factor other than landings histories) ignores the value being generated by a released fish and allocating those released fish to the commercial sector through quota transfers (i.e., Issue 4) punishes the conservation decisions made by thousands of anglers and removes that value added to the fishery for the next season.

Therefore, we recommend setting allocation based on total catch history instead of landings history to account for the released fish. Additionally, ASA recommends the consideration of socio-economic data to help inform allocation decisions.

Issue 4: Quota Transfers

The provision to transfer quota from the recreational to commercial sector highlights an issue of the Council not adequately attributing value to the recreational fishery. ASA recommends addressing the needs of the commercial fishery through reconsidering of the commercial state-by-state allocations as opposed to transferring quota from the recreational sector to the commercial sector.

Issue 5: Rebuilding Plan

ASA recommends that the council consider various projections to determine the best management alternatives for a rebuilding timeline. Considering our earlier comments on the stock assessment results, ASA recommends including a full suite of rebuilding timeline options as alternatives in the Amendment. We also recommend including various catch projection scenarios in the Draft Amendment so that both stakeholders and the Council can provide input on a preferred rebuilding timeline informed by the projection analysis.

Issue 6: Other Issues

The concept of subdividing the recreational allocation of bluefish into separate private/shore mode and for hire mode, known as sector separation, has recently been discussed for potential consideration. We believe that the Council/Commission decided on separate measures between modes for bluefish in 2020 without adequate public input or a demonstrated need. We oppose further exploration of sector separation for this fishery.

Sincerely,

Michael Waine
Atlantic Fisheries Policy Director
American Sportfishing Association

From: Anthony Testa <anthony@avscons.com>
Sent: Monday, March 2, 2020 12:24 PM
To: Seeley, Matthew
Cc: Beaty, Julia; Leaning, Dustin Colson
Subject: Scoping comments Bluefish, Scup, Summer Flounder and Black Sea Bass

Good afternoon Matt

First I want to thank you for excellent presentation at the meeting last week at Stony Brook. I did not write down the other presenter that did the summer flounder, scup and sea bass part of the meeting but wanted to get the thank you to her as well. I attend most of these meetings and this one was very well done. I do not have her email so if you could please send this to her it would greatly be appreciated.

My comments:

I am a recreational fisherman and board member of the NYRFHFA and have been fishing off Long Island for just about 50 years and have seen the ups and downs of fishing stocks including times when regulations did not exist. Few points for my opinion:

1) There has to be regulations that are fair and equitable for both the fish and people that fish! It is my opinion that the regulations in place and what is being discussed for the future is only hurting the fish and the people that fish for them. This applies to both recreational and commercial fisherman. I understand that your following past laws and procedures but it is time to revisit these laws and procedures as they are failing terribly and doing much more harm than good. I base this opinion on my many years of fishing and adapting to fish and bait migration patterns, disruption to the ecosystem that these fish call home and other problems that are both environmental and due to not education people on how to better take care of the fishing resources and waters. I speak to many people about the problems if fishing regulations and 9 out of 10 times the people have either no idea or the wrong information about how to correctly help if the fish management process.
2) Second and also very important is the MRIP data used for the assessment of the fish stocks. I can tell you first hand that since Hurricane Sandy fishing off the south shore of long island has changed a lot. These changes are having me run my boat to totally different areas to find the fish we are trying to catch and the fish are not really where they used to be. This does not show that there are no more fish but that due to the changes listed in my point #1 the people that fish have to adapt as well. I keep a log book and have not really found a measurable decline in my catches but find myself fishing in areas that no other boats fish because they just don't understand that fishing patterns change. The MRIP data is most troubling as this is the main problem we are facing and if not fixed there is a high percentage of failure in the fishery management efforts.
3) I believe that 10% of the people that fish catch 90% of the fish. This is a very important statement as if you ask the average person that really does not know how to fish how fishing is they will say it is terrible and there are no fish. I see this just about every time we come back to the dock. These "weekend warriors" that are out there are fishing right next to me and they cannot catch. Why is that? It is because they don't understand or adapt to fishing conditions. It would be a very good idea to reach out to some of the captains that really have a handle on what's going on and use that info in your work. At the meeting at Stony Brook there were some of the top guys both recreationally, commercially and for hire captains at the meeting and although comments were made, they often get ignored.
4) NYRFHFA: This group was started 2 years ago to fight for fair and equitable fishing regulations. We assembled a board of the top captains so we could try and work together with the powers that be to put a plan together that works for all. We want the fish stocks to be as strong as possible but cannot make any headway with this due to the process and current laws in place. Our group stands ready to help with any and all of our knowledge and

experience so all can benefit from the best plan for our goal. Too much time is wasted at these meetings just kicking the can down the street with no positive impact on the problems.
In closing I want to stress again that in order to fix this problem we should start over from scratch and come up with a more sensible approach to fishery management as we owe it to the fish and the people that fish for them. Fishing regulations are without question needed for all but these regulations have to work and in my opinion are not and if not will make things much worse than they seem to be right now.

Thank you
Capt. Anthony Testa

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, January 28, 2020 1:58 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Arnold Ulrich

Email: kavester@aol.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: The proposed regulation changes for Bluefish (3-fish bag limit for private anglers and a 5-fish bag limit for charter and party boats) is not sensible in that the states would not be able to manage and enforce the regulation. It's just not realistic.

(Sent via *Mid-Atlantic Fishery Management Council*)

AMERICAN SALTWATER GUIDES ASSOCIATION
Promoting Sustainable Business Through Marine Conservation

American Saltwater Guides Association

Chris Moore, PhD, Executive Director
Mid-Atlantic Fishery Management Council
North State Street, Suite 201
Dover, DE 19901

Dear Dr. Moore:

The American Saltwater Guides Association appreciates the opportunity to comment on the Bluefish Allocation and Rebuilding Amendment to the Bluefish Fishery Management Plan. This process provides us all the chance to recover the bluefish stock back to abundant levels. As you know, the fishery is dominated by the recreational sector and trends indicate that the species is a favorite of catch and release fishermen.

Issue 1: Fisheries Management Plan Goals and Objectives

We have only one comment on Issue 1. In goal two, the term "greatest availability" needs clarification. Recreational fishermen used to keep almost all bluefish. Today, they release a large majority. Furthermore, the recreational allocation for bluefish is set at 83%. This is a recreational fishery and must be managed as such.
Under these conditions, "greatest availability" should be maximizing opportunity for recreational anglers. That opportunity is increased with abundance. That abundance drives our business. The more fish in the water, the more trips will be taken. Bluefish need to be managed for abundance and that should be the definition of "greatest availability".

Issue 2: Recreational and Commercial Allocation

Prior to the recalibration of MRIP, the allocation discussion arose because managers saw that recreational anglers weren't using their portion of the quota. The preliminary plan was to look at shifting some of the quota to the commercial sector. Once MRIP was recalibrated and the full recreational effort was shown, this was no longer an issue. However, it is a real problem that the council viewed the trend of releasing fish as "not using their quota".

The economic impact of bluefish is not decreased by anglers choosing to release them. In fact, it is most likely increasing the value of the fish. Recreational anglers are not releasing fish so that commercial fisherman can harvest them. They are releasing them in the hopes of catching them again. Yet, they came close to losing allocation because they are being conservation minded.

For those of us that lived through the 80's and 90's, we saw the incredible waste from bluefish harvest. Large fish were frequently seen roasting in the sun on boats only to be thrown in dumpsters at the harbor. Is that a better se of the resources than catch and release? Does that drive the economy and sell plugs and lures for the tackle shops?

202.744.5013 info@saltwaterguidesassociation.org

American Saltwater Guides Association

Chris Moore, PhD, Executive Director
Mid-Atlantic Fishery Management Council
North State Street, Suite 201
Dover, DE 19901

This is a serious issue for all fisheries. Managers need to understand that catch and release is not a waste. It is actually a very responsible use of the resource. The Magnuson-Stevens Act lists catch and release fishing as a sound management practice for promoting fishing in the United States. Reallocation of bluefish to the commercial sector because recreational anglers are practicing catch and release goes against this federal law.

Issue 4: Quota Transfers

Please refer to our comments in Issue 2. The recreational sector is using their quota is they are choosing to release the fish. Taking quota away from recreational anglers for choosing to catch and release is the opposite of what managers should be doing.

Issue 5: Rebuilding Plan

We need to ensure that bluefish are rebuilt within ten years. The reductions for the 2020 season are appreciated.

Bluefish are widely dispersed and travel great distances. We need one uniform regulation for the entire fishery. We can not allow special concessions for one state. As per Magnuson-Stevens, the stock will do best when managed as a coastwide unit.

Consistent regulations will bring bluefish back in the shortest possible timeframe. That is what is best for all stakeholders up and down the coast.

Issue 6: Other Issues

We are seeing a dramatic decline in trips taken which can be directly correlated to lack of abundance. The same trend playing out in striped bass fishery. Abundance drives participation and that participation drives the economy.

As previously stated, this a recreational dominated fishery that is primarily catch and release. Bluefish are not highly prized as food but they are readily pursued by shore bound anglers for catch and release angling.

202.744.5013 info@saltwaterguidesassociation.org

American Saltwater Guides Association

AMERICAN SALTWATER GUIDES ASSOCIATION
Promoting Sustainable Business Through Marine Conservation

Chris Moore, PhD, Executive Director
Mid-Atlantic Fishery Management Council
North State Street, Suite 201
Dover, DE 19901

We have a rare opportunity to manage bluefish for abundance. This actually what the law directs us to do. MSA tells us to manage fisheries for the maximum benefit of the nation. The maximum benefit would be realized by having a well stratified population that represents all age classes and an abundant number of fish in the water to drive angler participation.

The council can achieve this goal by setting optimal yield well below maximum sustainable yield. This would not have a negative impact on commercial fisheries. As we have seen in the past, bluefish prices can fall substantially when the supply side is overwhelmed. By having a reasonable commercial limit, we are increasing the value of each individual fish. Lowering optimal yield would stabilize prices on the commercial side while benefiting the economy of the recreational side. The final issue that needs to be addressed is that commercial discards are ignored. Science tells us that the commercial fleet experiences discard mortality.

Since the quota is being lowered, we can expect commercial discards to rise. Incidental harvest will occur, and those fish will be dead discards as most of these fish are landed via gill nets. Ignoring the discards is not acceptable. We are trying to rebuild this stock and assigning a zero to that column is nothing more that inputting bad data. If we are truly interested in using the best available science, we need to account for dead fish.

We sincerely appreciate the opportunity to comment on this portion of the bluefish management process.

Respectfully,

Tony Friedrich

Tony Friedrich
VP/Policy Director

202.744.5013 info@saltwaterguidesassociation.org

From: o <bk1492@aol.com>
Date: Sun, Feb 9, 2020 at 4:35 PM
Subject: Fwd: PUBLIC comment ON FEDERAL REGISTER
To: <nmfs.garbluefishamend@noaa.gov>, <INFORMATION@sierraclub.org>, <CONTACT@thedodo.com>, <SCOOPS@huffpost.com>, <INFO@godscreaturesministry.org>, <INFO@lohv.org>, <INFO@pewtrusts.org>

THE QUOTA FOR LAS TYEARS SHOUDL BE CUT BY 50% AND THAT SHOULD BE THE QUOTA FOR THE COMING PERIOD.

I SEE THAT YOU HAVE SCHEDULED ONE OR TWOHOUR MEETINGS ALL OVER THE SEABOARD WHICH IS COSTING TAXPAYERS HUGE SUMS IN TERMS OF HOTELS, MEALS AND TRAVEL COSTS.WHY NOT JUST CHANGE THIS TO AN INTERNET MEETING IN THOSE SITES AND ALLOW PUBLIC COMMENT.
THIS INCESSANT UP AND DOWN THE COAST FOR A ONE HOUR MEETING THAT COSTS THE TAXPAYERS FOR MEALS, HOTELS AND TRAVEL IS INCESSANTLY COSTLY. WHENYOU SPEND SO MUCH, YOU TRY TOMAKE IT UP BY KILLING MORE FISH.I FIND THAT OFFENSIVE. LETS CUT THE COSTS AND MOVE THESE MEETINGS TO INTERNET MEETEINGS THAT ALL CAN JOIN. THIS COMMENT IS FOR THE PUBLIC RECORD. WE ARE IN 2020. HAVING MEETINGS IN 1935 STYLE DOESNT MAKE SENSE NOT HWNE IT COSTS SO MUCH FOR HOTELS, MEALS AND TRAVEL THESE DAYS.THIS COMMETN IS FOR THE PUBLICRECORD.
PLEASE RECEIPT. B KER BK1492@AOL.COM

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, January 31, 2020 6:15 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: barbara sachau

Email: bsachau@gmail.com

How would you describe your primary role in the fishery?: Other

Primary state(s) you land bluefish in::

Gear type(s) used::

Comments: quota to be cauht should be zero. the fact is the takings are overfishing and sustainability has been lost. all those fish belong to every citizens of the usa, nnot to the profiteers. it is time to consider the allocation to all the citizens of this country and stop the overexploitation of this species of fish. we are sick of fish stocks being exploited. look at the cod. ut the quota to zero

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Brian B <bassatnite@hotmail.com>
Sent: Tuesday, February 25, 2020 4:53 PM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments

Hi Mr. Seeley,
Who or what is causing the population decline of bluefish? That's what should be addressed. I fish over 50 days from surf and boat per year, and caught none from the surf along Robert Moses beach, but did have about a dozen days from June thru August where I took 1 - 3 blues in the Great South Bay, avg 3-5lb. Many fisherman I know release blues. How much is taken commercially? The commercials are prone to misrepresent in order to make $$$$.

Sincerely,
Captain Brian Bishop
Bayshore, NY

From: Brian Marks <bkm072@gmail.com>
Sent: Wednesday, January 29, 2020 1:53 PM
To: Seeley, Matthew
Subject: bluefish

where are the bluefish?why no answer to that simple question. but to cut all size bluefish from15 to 3 is insane that is an 80% reduction we are down to a handful of party boats in sheepshead bay a few will close with these regs. see how many bait and marine fuel stores have also closed. so $200 in gas $100 in bait and now 3 snappers with the kids I guess you guys will be happy when we all give up and play golf. do you really care about the impact on the recreational sector ? I read cuts cuts cuts but how about some answers on blues and fluke
and why the amazing amount of pory seabags and sea robin. it would be better to make some constructive statements and facts and stop killing our fishery and sport. never hear about the big time commercial poachers. its easier going after the law abiding fisherman but honestly how many of those will be left????

From: Brian Marks <bkm072@gmail.com>
Sent: Saturday, February 29, 2020 8:47 AM
To: Seeley, Matthew
Subject: rec fisherman less bait stores hardly any marine fuel hardly any party boats left in sheepshead bay

continue your assault on us THAT WILL BE YOR LEGACY HOW ABOUT SOME COMMON SENSE. 15 blues to 3 real good for the poachers

---

1075 Tooker Avenue
West Babylon, NY 11704
February 27, 2020

Chris Moore, PhD, Executive Director
Mid-Atlantic Fishery Management Council
North State Street, Suite 201
Dover, DE 19901

Dear Dr. Moore:

I am taking this opportunity to comment on the *Bluefish Allocation and Rebuilding Amendment to the Bluefish Fishery Management Plan* (the "Amendment"). The Amendment process provides the Mid-Atlantic Fishery Management Council (the "Council") with an opportunity not only to rebuild the bluefish resource to a healthy level of abundance, but also to pioneer a new approach to the management of federal fisheries that are dominated by the recreational sector and include a significant catch-and-release component.

ISSUE 1: FMP GOALS AND OBJECTIVES

The goals and objectives of the Bluefish Fishery Management Plan (the "Management Plan") largely remain valid, although in two cases need to be tweaked to reflect the evolving nature of the fishery.

I

With respect to Goal 2, the language should make it clear that "greatest availability" refers to maximizing the abundance of fish that remain alive in the water, rather than maximizing landings.

Bluefish is primarily a recreational fishery. The Management Plan allocates 83 percent of bluefish landings to the recreational sector.[1] The recent operational stock assessment[2] (the "Operational Assessment") revealed that recreational fishermen have exceeded that allocation in almost every year since it was established in 1998, meaning that anglers are accounting for an even greater part of the landings than previously believed. However, despite such high landings, anglers choose to release far more bluefish than they retain. In 1985, bluefish anglers kept more than 80 percent of the fish that they caught, but by the turn of the century, catch-and-release dominated the fishery; nearly 65 percent of the bluefish caught between 2010 and 2019 were returned to the water.[3]

It is thus clear that anglers are more concerned with catching bluefish than with keeping them. That being the case, and given the fact that anglers dominate the bluefish fishery, this fishery goal should

---

[11] Mid-Atlantic Fishery Management Council, *Amendment 1 to the Bluefish Fishery Management Plan*, 1998, p. 5
[2] Northeast Fisheries Science Center, *Operational Assessment of the Black Sea Bass, Scup, Bluefish, and Monkfish Stocks, Updated through 2018*, 2019, p. 54.
[3] Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, February 24, 2020.

define "greatest availability" as maximizing the abundance of fish, and thus angler encounters, as opposed to maximizing harvest.

II

With respect to Goal 5, the word "recruitment" should be deleted, as growth overfishing is undesirable in a predominantly recreational, catch-and-release fishery

Recruitment overfishing, which inevitably leads to a decline in stock abundance, is always unacceptable. However, growth overfishing, which sees the loss of the older, larger fish in a population, can be acceptable in a predominantly commercial fishery, if it allows larger annual harvests that do not exceed the maximum sustainable yield for the stock in question.

Recreational fisheries, and particularly recreational catch-and-release fisheries, are different. Most of the anglers participating in such fisheries are not seeking yield, but instead a quality fishing experience, with "quality" defined as frequent encounters with the target species, including occasional encounters with larger fish. Large bluefish are particularly prized for their hard fight, their willingness to attack artificial lures and, when the population is healthy, their availability to the shored-based anglers that constitute the single largest component of the fishery.

That being the case, avoiding recruitment overfishing is not enough. Growth overfishing should be prevented as well.

ISSUE 2: COMMERCIAL AND RECREATIONAL ALLOCATIONS

When this issue was originally raised, the Council believed that anglers did not land their entire annual allocation, and contemplated permanently reallocating some portion of the chronically unharvested recreational fish to the commercial sector. The Operational Assessment informed the Council that recreational landings were much higher than previously believed, and thus removed any justification for such reallocation. However, the original premise for a possible reallocation, that anglers didn't utilize the bluefish that the did not harvest, was false, and should be addressed in the Amendment.

Repeating a comment made in response to Issue 1, anglers release most of the bluefish that they catch. Most anglers fish for bluefish not so to kill them and utilize them as food, but because they enjoy catching and, at least in most cases, releasing them. Such fish are "utilized" by anglers when they are caught, fought and subsequently returned to the water; they do not have to be killed to be used. Furthermore, anglers return bluefish to the water in the hope that such fish will survive to be caught again, hopefully on multiple occasions. They do not release them solely so that they could be caught and killed by the commercial sector, pursuant to the reallocation contemplated by the initial scoping documents for the Amendment, that were released in 2018.

In fact, any such reallocation would tend to discourage anglers from releasing their fish, and encourage the sort of waste that was common prior to the 1990s, when anglers would keep most of the bluefish that they caught, then try, often unsuccessfully, to give them away upon returning to the dock. In those days, bluefish commonly ended up dumped in the bay, discarded in dockside dumpsters, or were used

to fertilize gardens. Recognizing catch and release as a legitimate use of the bluefish resource, and not as a justification for reallocating fish to the commercial sector, reinforces the goal of reducing waste in the fishery. It is also in accord with one of the explicitly stated purposes of the Magnuson-Stevens Fishery Conservation and Management Act[4] ("Magnuson-Stevens") which is "to promote domestic commercial and recreational fishing under sound conservation and management principles, ***including the promotion of catch and release programs*** in recreational fishing. [emphasis added]"[5] Reallocation of bluefish from the recreational to the commercial sector, because anglers chose to release rather than land some portion of their allocation, would thus be contrary to a stated purpose of Magnuson-Stevens.

ISSUE 5: REBUILDING PLAN

The Operational Assessment demonstrated that the bluefish stock is overfished, and thus triggered the need, pursuant to Magnuson-Stevens, to rebuild the stock. In doing so, there currently appears to be no biological reason why the stock cannot be rebuilt to the target within ten years, and there is no compelling biological, social or economic argument for compressing the rebuilding program into a shorter time period. Given that the bluefish fishery has different characteristics in different states, and even in different waters within the same state, a bag limit is probably the most equitable way to limit harvest. If a bag limit is not, in itself, adequate to constrain fishing mortality to a rate that would permit timely rebuilding, a size limit should be the next management measure considered, despite its impact on the so-called "snapper" fishery for young of the year bluefish.

Because bluefish is a species that engages in long coastwise migrations, and a single fish can potentially travel from New England into southeastern waters, the Council should seek to adopt a single, consistent approach to rebuild the stock. Such approach is consistent with National Standard 3, which directs, in part, that "To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range."[6] Permitting multiple management approaches, which would have disparate impacts on various components of the stock, would conflict with such National Standard.

ISSUE 6: OTHER ISSUES

I

Optimum yield should be set well below maximum sustainable yield, in order to maximize abundance, increase the number of older, larger fish in the population, and so maximize recreational opportunity

Magnuson-Stevens states that

> The term 'optimum," with respect to yield from a fishery, means the amount of fish which will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems; is prescribed as such on the basis of maximum sustainable yield from the fishery, ***as reduced*** by any relevant economic, social, or ecological factor; and

[4] 16 U.S.C. 1801 *et seq.*
[5] 16 U.S.C. 1801(b)(3)
[6] 16 U.S.C. 1851(a)(3)

> in the case of an overfished fishery, provides for rebuilding at a level consistent with producing the maximum sustainable yield in such fishery. [emphasis added; internal numbering omitted][7]

As noted earlier in these comments, a predominantly recreational fishery such as bluefish, where the majority of fish caught are released, should be managed for primarily for recreational opportunity, not food production. That is particularly true given the fact that, at least when bluefish are abundant, they command a relatively low market price,[8] suggesting that they are not a highly prized food fish. And as noted earlier, recreational fishermen, especially those participating in a primarily catch and release fishery, are primarily motivated by the opportunity to encounter bluefish, and at least occasionally by the opportunity to encounter large bluefish, rather than by the opportunity to harvest bluefish. That is a "social factor" that fully justifies reducing the optimum yield from the bluefish fishery well below maximum sustainable yield, as the lower target fishing mortality rate associated with such optimum yield is more likely to increase both abundance and the number of older, larger fish in the population.

There are also "economic factors" militating in favor of setting the optimum yield well below maximum sustainable yield. Bluefish, as noted in the previous paragraph, do not command high market prices. And when fish are present in an area, anglers will be able to fill the current 3-fish bag limit (which will be dropped even lower in 2021 if anglers harvest appreciably more bluefish in 2020 than they did in 2018 and pound-for-pound paybacks are imposed, something that is arguably likely given that 2019 landings exceeded those of 2018 by nearly 20 percent[9]) with a relatively limited expenditure of time and effort. On the other hand, catch and release fishing can be conducted for a much longer period while having the same impact on fishing mortality. Using the currently accepted 15% release mortality rate,[10] an angler who would have to catch and release 20 bluefish to cause the same level of fishing mortality as the angler who catches and retains only three; given the current level of bluefish abundance, catching and releasing 20 fish would probably require multiple trips, and a correspondingly high economic contribution

Managing for abundance, with a lower optimum yield, would also have a positive economic impact because abundance tends to drive angling effort. While the overall trend in directed bluefish trips has only been mildly negative in the period 2010-2019, with trips peaking at slightly under 7.9 million in 2012 and slowly declining to slightly over 5.4 million in 2019 (up from a time series low of 4.3 million the year before), it is far more marked in some regions and some sectors of the recreational fishery. In the North Atlantic, directed bluefish trips have steadily declined from 2.27 million in 2010 to just 0.84 million in 2019, presumably because the bluefish range is contracting in response to decreasing

---

[7] 16 U.S.C. 1802(33)

[8] *See* Mid-Atlantic Fishery Management Council, "Bluefish Fishery Performance Report," June 2018, p. 3, which indicates that bluefish prices fell as low as $0.20 to 0.25 per pound in New York when large fish were seasonally abundant, but rose to $0.50 to $0.60 per pound later in the year; *but see* Mid-Atlantic Fishery Management Council, "Bluefish Fishery Performance Report," August 2019, which saw scarcity cause New York prices to rise as high as $0.70 to $0.90 per pound, and New Jersey and Virginia prices to rise as high as $1.75 per pound.

[9] Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, February 23, 2020.

[10] Mid-Atlantic Fishery Management Council, "Bluefish Monitoring Committee Meeting Summary," September 18, 2019, p. 2

abundance. But the most dramatic decline in effort came in the party boat fishery, which saw anglers take over 100,000 directed trips as recently as 2014, when party boat effort peaked, and then quickly exit the fishery as abundance declined, taking less than 7,300 trips in 2018 and 6,200 in 2019, a 94 percent reduction in effort over only six years.[11] Given that more angling trips generate more economic activity, reducing optimum yield well below maximum sustainable yield would certainly be justified as a result of economic factors.

II

The Council should revisit its estimates of commercial and recreational discards

When the Council set bluefish specifications at its October 2019 meeting, it assumed that there were no discards in the commercial bluefish fishery,[12] and that discard mortality in the recreational fishery would be 4.03 million pounds.[13] There is good reason to believe that both assumptions are inaccurate.

At least half of the commercial bluefish landings can be attributed to the gill net fishery; another 9 percent is taken in trawls,[14] gear types that can lead to high levels of discard mortality. When such gear types are combined with the trip limits in place in many states,[15] discard mortality is inevitable. The most recent benchmark stock assessment chose to disregard such discard mortality, which it estimated as ranging between 1.5 and 10.7 percent of landings in any given year, believing that "commercial discards are minimal relative to landings and their use would likely introduce more error than they would resolve."[16] However, given the sharply reduced 2020 bluefish quota, there is a substantial likelihood that the level of commercial discards will increase, both relative to landings and in absolute terms. Thus, it would be prudent to obtain more precise estimates of such discards, and include such improved estimates in future management documents.

Recreational discard mortality is also likely higher than the 4.03 million pound estimate used to calculate the 2020-2021 recreational specifications. As noted by the Bluefish Monitoring Committee (the "Monitoring Committee"), the 4.03 million pound estimate "does not fully capture what is occurring in the recreational fishery because length frequency data suggests that most anglers keep smaller bluefish and release larger bluefish." In response to that issue, the Monitoring Committee recommended that a 9.90 million pound recreational discard estimate be used to calculate the recreational harvest limit for

---

[11] *Ibid.*

[12] Mid-Atlantic Fishery Management Council, "Bluefish Monitoring Committee Meeting Summary," September 18, 2019, p. 5

[13] Mid-Atlantic Fishery Management Council, Memorandum from Matthew Seeley to Dr. Chris Moore, Executive Director, "2020-2021 Bluefish Recreational Management Measures," November 1, 2019, p. 2

[14] Mid-Atlantic Fishery Management Council, *Supplemental Scoping and Public Information Document, Bluefish Allocation and Rebuilding Amendment to the Bluefish Fishery Management Plan*, December 2019, p. 15

[15] *See, e.g.*, New York State Department of Environmental Conservation, "Bluefish Quota Distribution Plan," February 2020, available at https://www.dec.ny.gov/outdoor/26823.html; Massachusetts Division of Marine Fisheries, "Commercial Finfish Regulations," January 30, 2020, available at https://www.mass.gov/service-details/commercial-finfish-regulations; Rhode Island Department of Environmental Management, "Marine Fisheries Minimum Sizes & Possession Limits," available at http://www.dem.ri.gov/programs/marine-fisheries/mfsizes.php

[16] Northeast Fisheries Science Center, *60th Northeast Regional Stock Assessment Workshop (60th SAW) Assessment Report*, 2015, p. 354

2020 and 2021.[17] Such recommendation was rejected by the Council, with various Council members questioning the data on which the 9.90 million pound estimate was based; surprisingly, not a single recreational member rose to support the Monitoring Committee's basic premise, that anglers tend to keep smaller bluefish and release the larger ones, as such behavior is very typical among recreational fishermen. Many anglers don't keep any bluefish at all, believing that their flesh is too oily and strong-tasting; the majority of anglers who do keep bluefish prefer smaller individuals which are less dependent on menhaden and similar forage species, and thus have a more mild taste, and release the larger, stronger-tasting individuals. That being the case, the Council's finding that the size of the fish released parallels the size of the bluefish retained by anglers will lead to a very significant underestimate of release mortality, has the potential to hamper rebuilding, and should thus be revisited.

Thank you for considering my views on this matter.

Sincerely,

Charles A. Witek, III

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 11:57 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Chris Dollar

Email: cdollar@cdollaroutdoors.com

How would you describe your primary role in the fishery?: Recreational (for-hire)

Primary state(s) you land bluefish in:: Maryland, Virginia

Gear type(s) used:: Hook and line or handline

Comments: Council and ASMFC members,
As a fishing guide and outfitter, Bluefish Fishery Management Plan should be as conservative as possible to leave in the water as many bluefish as possible to ensure the stock rebounds adequately.

Regards,
Capt. Chris D. Dollar
CD Outdoors
(410) 991-8468
cdollar@cdollaroutdoors.com

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Chris Nastasi <cnastasi33@verizon.net>
Sent: Tuesday, March 17, 2020 5:01 PM
To: Seeley, Matthew
Subject: New blue fish regulations

Once again fisheries management has found a way to screw the little guy. If you can't afford to go on a pay for hire boat you can only keep 3 fish. If you can't afford your own boat it is very difficult to catch three Bluefish unless they are of the snapper size. Tell me what good are three Snapper Bluefish going to do for an individual who would like to eat a meal? Why is someone who pays to go on a boat or can afford to own his own boat like myself more privileged then those who can't?
As a private boat owner I spend a lot of money supporting businesses between my purchase of boat and fishing equipment gasoline Bait and Tackle food Etc why am I penalized because I'm not paying to go on a party or Charter boat? Your regulations are poor make them even for all at 5 Fish per person!
For the record I want it to be known I am against the current proposed regulations.

Bluefish Scoping Comments

March 10, 2020

To whom it may concern,

I am writing to provide comment for the Scoping Document of the "Bluefish Allocation and Rebuilding Amendment to the Fishery Management Plan. These comments are all my own opinion.

I am a recreational fisherman who lives in Maine. I have been fishing for striped bass and just about every other saltwater species that we get here for over 20 years. The fishing for bluefish over the past few years has been extremely poor. I was glad to hear of the new coast wide regulations in both State and Federal waters that set the bag limits at 3 fish/person and 5/charter boat for the recreational fisherman. Hopefully in a few years this will lead to improved fishing here in Maine. With that said I hope these measures stay put for at least 3-5 years in order to give them a chance to work. I know there will be many fishing interests who will want to increase these limits.

On Issue 1, I think the Goals and Objectives are good although I do think there needs to be more scientific research into understanding the stock of this fishery. I am thinking about this with regards to fishing here in Maine. It has long been known that the fishing here for bluefish can be very variable from year to year. Many thought it was tied to the presence of menhaden, which can also be highly variable here. But for the past 3 years we have had large amounts of menhaden here and virtually no bluefish. Obviously overfishing is a cause of the lack of bluefish here but are there other factors that drive the fishing cycles? Are the fish we catch here in Maine really the same fish they catch in Florida?

On Issues 2-4 I don't have a strong opinion, but I would just like to make sure that with whatever the allocations the recreational sector gets a fair share.

On Issue 5, the Rebuilding Plan. Hopefully, as is stated in the Scoping Document, the fast growth rates of bluefish will lead to a quick recovery of the stock. As I have said I am happy with the new restrictions for the recreational fisherman and I hope they are in place for a little while to see if they can make a difference. Also, the proportionate restrictions for the

commercial sector are important. With that being said I hope the stock is closely monitored and if it does continue to decline more restrictive measures are put in place.

On Issue 6, Other Issues, there are a couple of things to keep in mind. First, there is a lot of talk in the Scoping Document about changes in the geographic range of bluefish. This may be true, but I think it is important to keep in mind that there has been overfishing of bluefish for almost every year in the time series of this document! So, when it comes to State to State Allocations and changes in the geographical range it is going to be difficult to make an accurate choice.

On Management uncertainty I would like to comment as well. As you show in the Scoping Document there is a considerable difference between the New and Old MRIP estimates. I have seen that this is true when looking at other species as well. Maybe it would be worthwhile to reexamine the New MRIP estimation to see if the values are as high as they claim. Regardless, if you look at either method, they both show the recreational bluefish harvest to be the lowest in the time series.

Thank you for allowing me the chance to give my input for this process.

Chris Uraneck

Freeport, ME

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, February 5, 2020 12:43 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Chris Yoda

Email: cyoda6@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: The past and current management plans have let down this species to the highest degree. There are little to no more bluefish in my area. Drastic and long term changes need to be implemented to save what is left of this once prolific species. Shame on fisheries management

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, January 31, 2020 5:34 PM
To: Beaty, Julia <jbeaty@mafmc.org>
Subject: Form Submission - SFSBSB Allocation Amendment Scoping

Name: Chuong Ngo

Email: ChuongNJ@yahoo.com

Check all that apply: Private Recreational Angler

: Bluefish deduction

Comments: I have question:

How the the bluefish data was collected?
How we know these data was corrected, what is error percent rate on these data?

I data was present look very nice on the chart.

I went out fish bluefish very year, I can see one year had more and another has less. it was not less and less year by year.

I don't see math to used for reduction will help the bluefish improve.

1

My suggestion is size limit should be enforce, this will give time for the fish to grow. because I saw a lot of people fishing small fish.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Corey Gammill <cmgammill@gmail.com>
Sent: Tuesday, February 11, 2020 9:58 PM
To: Seeley, Matthew
Subject: "Bluefish Scoping Comments"

To Whom it may concern:

I am commenting on the Bluefish Stock status seeing as I will be unable to make the scoping meeting at mass maritime on the evening of February 13th.

Like many I am incredibly concerned with the status of the bluefish stocks. It is no secret that the two main species in our fishery are Stripers and Blues and we are seeing both on a decline. I am personally frustrated that we are managing by looking in the rearview mirror rather than try and be proactive and adjusting on what the future looks like. We have enough data and information that we should be able to make reasonable assumptions about the future. Instead we wait until both stocks are "overfished" to manage rather than to watch their trajectories. As a professional fishermen, this has been coming at us for the last five years, yet we are only making changes now...

That said, I do understand that the DMF and ASMFC only have certain tools in their toolbox to manage both fisheries including min/max size and bag limits. Unfortunately what we hear very little about is the vertical role of these fish in the ecosystem. There is no doubt that the main bait source in the NorthEast for both fish are over pressured. Herring and squid which are two of the prime baits for both fish. Herring has been recognized as being on the decline and has been mismanaged. As for squid, I understand coastwise squid stocks are fine, but localized depletion is taking place in Mass. We see this as most of the fishing for longfin squid in the middle trimester is taking place just south of Nantucket and the vineyard so much of these bait are not getting through to the bass and blues, thus the fish are waiting for bait that isn't coming. These commercial squid boats 10 years ago never fished off of Nantucket and their predominance over the last 10 years have severely affected the bait off the cape and islands which is a key piece of the puzzle for these fish.

Over the last 10 years we have also seen a large increase in competition for the bait that does exist. Competition exists not just amongst bass/blues, but also with the rise in the seal population. Fishermen are talking about it, but No government official is willing to recognize the impact that the seal population is having on bait.

Everything I am hearing for a "solution" is lowering bag limits. This is too easy an answer that will again have us looking in the rearview mirror in two years. I have no data to prove my theory, but I doubt less than 5% of recreational fishermen are keeping their bag limit let alone the new proposed limits of 3 or 4 fish and most of those keeping the limit are for hire guys who are keeping the bag limit to make the dock look good. So why is adjusting the bag limit a potential solution if it does not change anything. One of the common trends stated in the data being collected is that average size of fish are decreasing. For starters, lets create a minimum size so small fish can get to reproduction age, just as we are doing with Striped Bass. We should also have a maximum size, so the large fish can reproduce safely.

So here is a summary of how we should be looking to solve the problem from one fishermen's opinion:

- Minimum/max size, just like Striped Bass
- Adjust the bag limit to 1 fish per person per day. Get ahead of this problem, don't chase it.
- Look very closely at the role that seals are playing in consuming bait that the bluefish want.
- Be thoughtful about protecting bait at its source. Squid for example reproduce south of Nantucket and historically the squiddos are the prime food for blues through July/August. The destruction of the squid mops

and reproduction grounds have ruined our squiddo population and the same areas that 7-15 years ago produced bluefish all summer long are now barren.

- Even though I am a "for hire" fishermen, I do believe in most cases the recreational guys are the issue and both commercial and rec guys should bear the burden for solving this problem and one is not the problem, but both need to make adjustments. The one problem I do have with the commercial world is that we still have one gill netter in Mass who can kill 5000lbs a day. If we are going to begin to solve this problem, lets eliminate this piece as that gill netter alone was responsible for a up to one half of all commercial fish caught. This seems like a simple solution. Why should one person get to make a living using an archaic method that has only one person allowed to do it in the state, while the rest of us struggle on a daily basis.

My name is Corey Gammill and I make my living working on the water. I spend 140 days on the water every year and I have for the last 20 years. I fish the waters around Nantucket and south of the vineyard and east of the cape. My log books can tell it all. We have less bait than we used to, we have less fish (blues/bass) than we used to, and the fish we do have are smaller and we have more big predators(seals/sharks) than ever before. Small adaptions in bag limits will not be enough, we must looking at the vertical nature of our ecosystem and make some big changes.

My only last small question/comment is why does Stripers use a 9% dead discard rate assumption and bluefish use a 15% dead discard rate assumption?

Capt. Corey Gammill

203-962-8867
cmgammill@gmail.com
Owner: Bill Fisher Outfitters www.billfisheroutfitters.com ,
Owner: Bill Fisher Tackle www.billfishertackle.com
Director of Fishing: Great Harbor Yacht Club
Twitter: @billfishers

Directions to Madaket Marine: http://billfisheroutfitters.com/pricing-info

Weather and Cancelation Policy: All Weather related cancelations are determined by the Captain. The season is short and we try to take every opportunity to fish, so please plan accordingly. If changes in your schedule come up you can cancel up to 7 days off. Inside 7 days if we can rebook the trip we will happily oblige. And please remember as we tell our kids all the time, *see your commitments through....*

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 10, 2020 4:42 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Craig Shultz

Email: Snipershultz70@GMAIL.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey, Florida

Gear type(s) used:: Hook and line or handline

Comments: If they change the blue fish limit I will not be renting for 2 to 4 weeks in Ocean City N.J.as I have done for the past 20 years. The landlords and the shore towns will suffer. Cut out the commercial guys like Fl. did. Cast nets only!

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, February 4, 2020 7:20 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Dan Sheehan

Email: ds6051@yahoo.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: The limit reductions being proposed are very drastic and should make some differentiation between the charter business and the individual angler. They keep more of the catch on the charter boats than off the beach or on private boats.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, January 31, 2020 11:29 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Daniel Wwhitcraft

Email: wildboar201267@yahoo.com

How would you describe your primary role in the fishery?: Recreational (for-hire)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: I don't that's fair the Jersey to cut back on the bluefish limit there's so many bluefish out there they should cancel that bill on bluefish limits noway

(Sent via *Mid-Atlantic Fishery Management Council*)

---------- Forwarded message ---------
From: David Dow <ddow420@comcast.net>
Date: Tue, Mar 10, 2020 at 4:08 PM
Subject: Bluefish Scoping Comments
To: <nmfs.garbluefishamend@noaa.gov>
Cc: David Dow <ddow420@comcast.net>, Peter deFur <pldefur@gmail.com>, Judith Weis <jweis@newark.rutgers.edu>, leslie Kaufman <lesk@bu.edu>, Wes Pratt <pratt.wes@gmail.com>, <cmoore@mafmc.org>, <rbeal@asmfc.org>

I am a retired marine scientist from the Northeast Fisheries Science Center in Woods Hole, Ma. and grassroots environmentalist living on Cape Cod, Ma. I participated in the March 4 online scoping webinar for the Bluefish FMP which left something to be desired (since no information was provided on the underlying stock assessment which provided the basis for developing the recovery plan for overfishing by saltwater anglers).

I was the Recreational Fisheries Coordinator in the Northeast for a number of years and attended the SAW/SARC (Stock Assessment Workshop/Stock Assessment Review Committee) assessment for recreational managed species. I also visited with a number of recreational fishing organizations in the Northeast where I was often asked how catch and release of Atlantic striped bass by saltwater anglers killed more fish than direct harvesting/bycatch by the commercial fishing sector (large differences in fishing effort coupled with 10% catch and release mortality). A number of the constituent commenters on the March 4 webinar brought up concerns on discard mortality for bluefish, so I would suggest better outreach on this topic.

In more recent times the "natural mortality" is a larger fraction of the total mortality than in the past due to combination of: warming waters and increased ocean acidity; eutrophication; hypoxia; competing human uses of the ocean (ocean wind farms; US Naval training; oil/ gas seismic surveys; increased ocean noise; etc.). The shifting ocean baseline; changes in the marine food chain (shifts in prey species and their predators in space/time) and reduced "productive capacity of Essential Fish Habitat" has altered catches of species harvested by both the commercial and recreational sectors in state/federal jurisdictional waters.

I participated in the EMaX (Energy Modeling and Analysis Exercise) Carbon budget project for the Northeast Continental Shelf Ecosystem. The EMaX project showed the there was a disconnect between primary production at the base of the food chain and the yield of Living Marine Resources at the top. In addition, as fish species and their prey shift in space and time due to warming inshore waters; increased ocean acidity; eutrophication; hypoxia; etc., the predation and competition interactions at the top of the food chain have

changed. Thus the yield of bluefish may be diminished by both fishing and natural mortality and shifts in the productive capacity of Essential Fish Habitat. Thus some scientists and ENGOs favor transition to an adaptive, ecosystem-based management approach to include these changes in the traditional fisheries management approach.

I don't know whether the MAFMC, ASMFC and NOAA Fiheries GARFO are considering a,EbM approaches to supplement the traditional SAW/SARC assessment for quotas; overfished and overfishing reference points; developing realistic recovery plans, etc. In addition, there is consideration of "sustainable fishing" approaches which include: ecological; socioeconomic; cultural and institutional indicators of successful recreational and commercial fishing. See the attached Addendum for the Sierra Club approach to these challenges (Sustainable Fisheries Policy and Adaptive Management graphic)

The changes in the MRIP and its effects on changing the status of the recreational fishing harvest illustrates the need to convert scientific studies and monitoring into the management process for bluefish (since this plan has taken a number of years and won't be completed until 2021) in a timely/more efficient fashion. There is a need to coordinate fisheries management (ASMFC; MAFMC; NOAA Fisheries GARFO) with regional ocean management plans which try to balance compatible human uses with the protection of wild places, wild things. The Massachusetts Ocean Management Plan (MOMP) pushes for offshore wind farms, but ignores fisheries management and human activities in coastal watersheds ("N" enrichment; contaminants of emerging concern; ocean outfalls from wastewater treatment plants; disposal of dredge spoils & barrels of toxic chemicals; etc.). The Northeast Regional Ocean Plan has databases for habitats and the associated marine species.

Thanks for your consideration of these comments.

Dr. David D. Dow
East Falmouth, Ma.

Addendum:

From: **David Dow** ddow420@comcast.net
Subject: Ma. Chapter Comment on OHA 2 DEIS Attachment
Date: December 13, 2014 at 2:57 AM
To: **David Dow** ddow420@comcast.net

* Sierra Club Sustainable Fisheries Policy

Sierra Club Conservation Policies

Policy on Sustainable Marine Fisheries

Fish are a vital ecological, economic, and food resource, but many species are in decline because of habitat loss, pollution, over fishing, and bycatch1. Fisheries management is hampered by incomplete knowledge of fish life cycles, complex ecosystem relationships, population size, natural population fluctuations, and the adverse effects of habitat loss and pollution. Current commercial and recreational fishery practices have contributed to changes in the biological composition of marine ecosystems. Long-term ecological health and sustainability of aquatic biodiversity must take precedence over short-term economic considerations.

All parties, commercial and recreational fishers, consumers, environmental groups, governmental regulators, and the general public, must move towards a policy of recovering depleted fisheries stocks and developing a sustainable fishery management regime.

The Sierra Club therefore urges the state and federal agencies responsible for fisheries management to:

1. Adopt the precautionary principle to protect the biodiversity and integrity of the coastal and ocean ecosystems;

2. Move from managing fisheries on a species or species complex basis to an ecosystem approach which would include addressing: (a) the impacts of fishing on non-target species (sea turtles, marine mammals, sea birds); (b) changes in biodiversity of the marine food web as a consequence of harvesting fish; (c) impacts of land-based pollution from all sources and habitat loss/degradation from physical human activities in estuarine, nearshore, and offshore areas; and (d) population structure of target fish species and composition fish communities to avoid fishing down the food chain from larger predator species to smaller species lower in the chain.

3. Invest in coordinated and expanded research on habitat, fishing and natural fish mortality, climate change, threats posed by biotoxins, bacteria, and viruses, and development of less destructive fishing gear and techniques;

4. Designate and utilize no-take reserves, time and area closures, and restrictions on fishing effort for protection of breeding, spawning, and nursery areas for fish.

5. Develop better coordination of fisheries management across jurisdictional boundaries;

6. Establish and implement programs and policies that effectively reduce habitat degradation by physical disruption and land based pollution sources;

7. Eliminate government subsidies that support unsustainable fishing operations;

8. Provide financial aid only for retiring fishing vessels and gear, and for retraining displaced fishermen for new employment opportunities. Support economic incentives to promote the use of gear or fishing operations that are shown to be less damaging to habitats and ecosystems.

9. Provide greater opportunity for non-commercial fishing constituents, representatives of environmental and consumer groups, and private citizens interested in our public fisheries resources to participate in fishery commissions, councils, and advisory panels that recommend or set fisheries public policy.

Definitions:

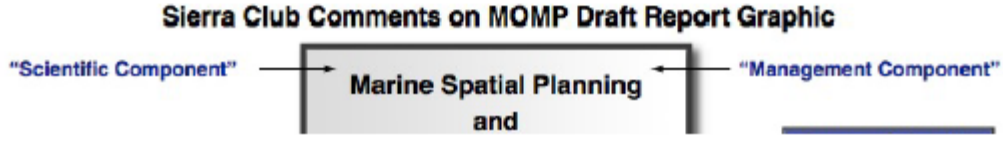
1. Bycatch - Bycatch is the indiscriminate catching of fish and other marine life other than those a fishing vessel intends to capture. This includes fish that are not the target species, sex, size, or quality. It also includes many other fish and marine life that have no economic value, but are ecologically important, such as starfish, sponges, and skates. Primarily, bycatch results from fishing practices and gear that are not selective. In addition to visible mortality, fish and other sea life are sometimes killed or injured when passing through or escaping fishing gear, and through ghost fishing from abandoned or lost gear.

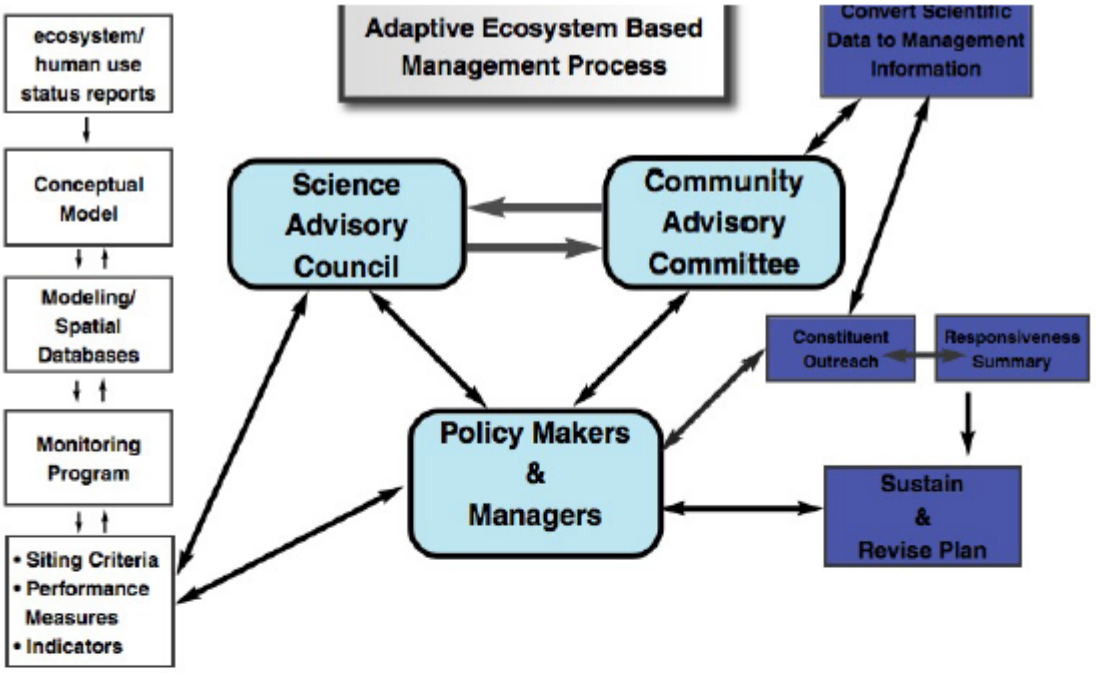
2. Precautionary Principle - Precaution involves acting in advance to avoid or minimize negative impacts, which implies, in environmental management, that in the face of scientific uncertainity on cause and effects relationships accompanying the potential impacts that the benefit of the doubt is given to the conservation of natural resources and the maintenance of biodiversity.

Board of Directors, September 20-21, 2002
Agenda #B3b, Consent Agenda

* Adaptive, Ecosystems Based Management Graphic from MOMP Comments (developed by Dave Raney and myself)

2. Sierra Club MOMP Adaptive Management Graphic





Definitions and Flow-Chart Description - Marine Spatial Planning Process
Ecosystem Status Report: describes existing state of marine biota (distribution and abundance in time
and space) and their associated habitats, plus the key environmental processes that support these components

Human Usage Report: describes the spatial distribution and socioeconomic outcomes associated with
fishing, sediment dredging, aquaculture, proposed renewable energy projects, marine transportation lanes,
recreational activities, etc.

Conceptual Model (options): risk analysis; vulnerability analysis; scenario techniques; complex adaptive approaches.

Modeling/Marine Spatial Databases: NEFSC Bottom Trawl and Food Habits ; Nature Conservancy
Marine Ecoregional Assessments (MERA); U.S. Geological Survey Seabed Sediment mapping; Massachusetts. Ocean Management Plan human uses (fishing, recreation, marine transportation, beach
renourishment),SSUs habitats/marine life (special, sensitive and unique) and EVI (Ecological Valuation
Index); potential wind energy maps; etc.

Monitoring Program: Site specific (project proponent) and regional context (MMS; Massa.state agencies) for physical, chemical, geological and biological components specified in permits or government work plan.

Siting Criteria/Performance Measures/Indicators: changes in distribution/abundance of key fish,

marine mammal, seabird/shorebird species; biomass spectra of marine food chain; benthic/epibenthic indicator species; sustainability indicators; socioeconomic direct/indirect/induced benefits (multiplier ratio); changes in human usage patterns; etc.

Science Advisory Committee: MOMP Ocean Science Advisory Committee
Management Options:

• Mitigation - measures taken to reduce the pace and magnitude of climate change (increased energy use efficiency; planting more forests; increased use of renewable energy sources to produce "green electricity)

• Adaptation - Measures taken to reduce adverse impacts associated with climate disruption (shoreline retreat for human structures; rebuild beaches, dunes and salt marsh buffers; etc.)

• *i.e. mitigation is designed to avoid unmanageable climate change, while adaptation addresses climate change effects that are unavoidable (See* "Avoiding the unmanageable and managing the unavoidable" *study by U.N.Scientific Expert Panel on Climate Change)*

Resilience: For socioecological systems refers to its ability to absorb a shock and maintain its basic capacity to function/maintain critical structural components (Boston Globe article on financial complexity and the inability to estimate systemic risk which lead to cascading effects/economic meltdown).

Community Advisory Committee: MOMP Ocean Advisory Council and MMS State Stakeholder Groups (federal, state, local and tribal representatives).

Constituent Outreach: those of us looking for community benefits and meaningful input on planning/implementation process for small scale community wind farms in state waters and large scale projects within the EEZ (reactive versus proactive involvement

---

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 10, 2020 1:19 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Dean Kenny

Email: ddkenny311@aol.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New York, New Jersey

Gear type(s) used:: Hook and line or handline

Comments: Make 5 and 5 people are going to start selling their boats and then the jersey shore will be screwed. Bring back winter flounder to

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, January 21, 2020 10:20 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Dean Pesante

Email: dpesante@cox.net

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Gillnet

Comments: To the Bluefish Scoping committee.My name is Dean Pesante owner and operator of the F/V Oceana based out of Point Judith Rhode Island.I have been deeply involved in the Bluefish fishery since 1991. The two suggestions I would make for this process would be 1) Increase the minimum size in the north to 18" and to the south 16'. For both commercial and recreational fisheries. The studies that have been done show that at these sizes Bluefish are 100% sexually mature and 100% spawning can occur.There is no reason to harvest a fish before it has the opportunity.to reproduce..This would assure future recruitment and a healthy stock. 2) Based on landings over the past 10 years there is a obvious shift of Bluefish to the North. Therefore the percentage of the coast wide quota to individual states should be adjusted to accommodate this trend. Bluefish has been a healthy fishery here in Rhode Island for a long time and continues to be currently. Many of the Fishermen here rely on this fishery. Hopefully these suggestions will be helpful moving forward during this process. Sincerely. Dean Pesante

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, February 28, 2020 8:14 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Dean Pesante

Email: dpesante@cox.net

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Gillnet

Comments: My Name is Dean Pesante. Owner / operator of the F/V Oceana a inshore Gill-net vessel based out of Point Judith Rhode Island. We have been fishing for Bluefish since 1991. It is our primary fishery. There is no problem with the Bluefish stocks here in Rhode Island. There are plenty of fish. Our biggest problem is getting enough quota to cover our landings. We have been getting quota transfers from the southern states on a regular basis. It is obvious that the trend for Bluefish has been a move to the North. The southern states are not coming close to their quota and we keep going over.Having to ask for transfer quota. So I would recommend reallocation of quota from south to north to change with the times. Also I think it is VERY important to raise the minimum size to allow Bluefish to reproduce. The science shows a 18" fish to the north and a 16" fish to the south will be 100% sexually mature. Small immature fish should not be allowed to be taken. This should apply to BOTH commercial and recreational. Finally the the percentage of quota between commercial and recreational should be changed to adjust to accommodate the demand for Bluefish in the market place. Bluefish has become a very popular food fish. The general pubic should not be denied the opportunity to buy Bluefish. The increase in demand has greatly increased the value. Not only making it more important to the public but also to the commercial fisherman and woman harvesting them. There fore I would recommend a much higher parentage of the quota allocated to the commercial fisheries. 40% commercial 60% recreational. This is not unreasonable.Fish is food,their not toys. The public should not be denied this source of protein.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, March 11, 2020 7:52 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Dean Pesante

Email: dpesante@cox.net

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Gillnet

Comments: Bluefish is a important food fish. More people are eating Bluefish now then ever before.Bluefish is the east coast salmon. The general public should not be denied the opportunity to have access to this incredible source of protein. The only way Bluefish will be made available to the general public in the market place is to adjust the percentage of quota between commercial and recreational fisheries. I would propose a 50/50 split between commercial and recreational fisheries. The public should not be denied this important source of protein. FISH IS FOOD. NOT TOYS. Sincerely. Dean Pesante F/V Oceana

(Sent via *Mid-Atlantic Fishery Management Council*)

DIRECTED SUSTAINABLE FISHERIES, INC.

A SALTWATER FISHERIES CONSULTING COMPANY

17 March 2020

Bluefish Allocation and Rebuilding Amendment to the Bluefish Fishery Management Plan
Scoping and Public Information Document
Mid-Atlantic Fishery Management Council (MAFMC)
Atlantic States Marine Fisheries Commission (ASMFC)

Re: Bluefish Allocation and Rebuilding Amendment Scoping Comments

To: Matthew Seeley, mseeley@mafmc.org
To: Dustin Leaning, dleaning@asmfc.org

Directed Sustainable Fisheries (DSF) clients depend on catching Bluefish from Florida state and federal waters for decades to provide seafood sales for the non-boating consumers. Also, the Florida recreational fishing sector land Bluefish during for-hire trips, or privately for personal consumption. DSF commercial client Seafood Atlantic from Port Canaveral, FL is in support of "Status Quo" for allocation percentages with a continued transfer of unused quotas as needed.

The MAFMC/ASFMC proposed reallocation of acceptable catch limits from commercial entities who have regularly reported their landings is fiscally harmful to the seafood industry. This is because "estimated catches" are being used from inflated populations of the recreational fishing sectors depending on Marine Recreational Information Program (MRIP) data produced under new circumstances. Many for-hire captains, commercial entities and State managers including then Florida Fish & Wildlife Commission (FL FWC) as evidenced by the attached three letters from FL FWC who do not believe the astronomically high landings. The MRIP results are not reliable and the damage to the commercial seafood industry and the for-hire fleets will be financially harmful if not fixed.

The DSF position for status quo is defensive to fix a bad MRIP estimated choice for the Bluefish scoping effort by MAFMC and ASMFC that began before the MRIP calibration results had become public during July 2018. The Bluefish MRIP calibration changes were not included in the 2018 Bluefish scoping document alternatives. When the 2019 Operational Assessment used the new MRIP catch increases for the period 1981 to 2017, there was concern with that action, and the inflated results.

A Full Benchmark Assessment should have taken place instead of depending on an Operational Assessment result to suddenly use revised MRIP data as compared to past estimated totals by the National Marine Fisheries Service's science. The FL FWC during 2019 noted their concern with quotes such as copied below from the three attached documents;

> The magnitude of differences in new catch estimates generated from FES compared to those generated from the CHTS and some observations that we have made in Florida make us question the accuracy of these estimates. Some of these observations include:
>
> - Different independent surveys conducted by Gulf states consistently generate substantially lower estimates of effort and catch than those generated from the FES.

For the period 2000-2017, the estimates from the FES indicate that statewide trips are 2.8 to 3.9 times higher than previous estimates. This dramatic difference in fishing effort results in estimates of harvest that are far greater than what we had been managing for previously. For example, the new statewide estimate of the harvest of red snapper is double what it was for the old estimates. For inshore species, such as common snook, harvest estimates are more than triple those calculated previously.

In summary, we believe that there is ample evidence that the FES may be over-estimating fishing effort. We also believe that there should be a thorough analysis of the effect of these estimates on stock status and allocation before they are used for management of our fish stocks. Utilization of these estimates, that in some cases appear to be non-sensical will affect management decisions and further erode the public's confidence in a management process that already has lost public confidence. We are requesting that the FES generated estimates be reviewed thoroughly by a panel of statistical experts to ensure that the FES design is **functioning** as intended.

We do not believe that the estimates generated from the FES should be used to determine stock status, catch advice, or allocation decisions until potential biases causing these unrealistic estimates have been identified and the estimates have been corrected. Until this recalibration has been done, utilization of the FES generated estimates in assessments and for allocation decisions can lead to inappropriate stock status determinations and allocation formulations.

Some of the best ex-vessel prices for all sizes of Bluefish during the past few years are occurring as the non-boating consumer desire fresh domestic fish. Florida has had 10% of the commercial allocation on the US East Coast. North Carolina commercial fishing entities have also requested status quo, and tend to land the largest amount of Bluefish on the US East Coast. Both Florida and North Carolina support the continued transfer of underutilized recreational catch to the commercial sector as needed. A real recreational census should have been developed over the past years. Past data shows that the recreational sector only exceeded their allocation during 2007, while not catching the estimated allocation during most years based on the previous data.

Recreational analyses are two to one for releases versus landings of Bluefish and have a 15% dead discard rate that needs to be reexamined in a Full Benchmark Assessment. SAW SARC 60 completed the recent benchmark during 2015 with data through 2014. The results indicated then that the Bluefish biomass was not overfished, and overfishing was not occurring then. This was a positive result that should have justified a status quo until a Full Benchmark Assessment was completed. But the rush to employ science that really is not the best available, and using it will create a negative economic scenario. DSF supports Status Quo with the commercial 2018 Initial Quotas pasted below as presented in Table 2 on page 16 from the December 2019 Supplemental Scoping and Public Information Document.

Table 2. Commercial state allocations (percent share) and 2018 landings.

State	Percent Share	2018 Initial Quota	2018 Landings
Maine	0.67	48,424	29
New Hampshire	0.41	30,025	0
Massachusetts	6.72	486,539	195,402
Rhode Island	6.81	493,160	237,182
Connecticut	1.27	91,727	48,220
New York	10.38	752,268	539,345
New Jersey	14.82	1,073,245	56,210
Delaware	1.88	136,052	6,486
Maryland	3.00	217,442	27,353
Virginia	11.88	860,518	102,630
North Carolina	32.06	2,322,397	765,764
South Carolina	0.04	2,550	0
Georgia	0.01	688	0
Florida	10.06	728,697	224,999
Total	**100.01**	**7,243,726**	**2,203,591**

Rusty

DIRECTED SUSTAINABLE FISHERIES, INC.

A SALTWATER FISHERIES CONSULTING COMPANY

Russell Howard Hudson, President
Directed Sustainable Fisheries, Inc. (DSF)
PO Box 9351
Daytona Beach, Florida 32120-9351

(386) 239-0948 Office
(386) 290-8443 Cellular

DSF2009@aol.com

Saltwater Fisheries Consultant, Shark Specialist
Deep-Sea Fishing Expert and Shrimp Boat Captain
Retired 100-ton United States Coast Guard (USCG) Licensed Sea Captain
Recreational, For-Hire & Commercial Fishing Life Experience, 1958-2020
Sixth Generation Waterman from Central Florida (FL) East Coast
Seafood Coalition (SFC) member
American Elasmobranch Society (AES) member 2004-2020
Atlantic Coastal Cooperative Statistics Program (ACCSP) Advisory Committee FL member
ACCSP Biological Review Panel (BRP) member
ACCSP Bycatch Prioritization Committee (BPC) member
Atlantic States Marine Fisheries Commission (ASMFC) Coastal Shark (CS) Advisory Panel (AP) FL Commercial & For-hire recreational member [former Chair of CS AP]
ASMFC Bluefish AP FL Commercial member
National Marine Fisheries Service (NMFS) Highly Migratory Species (HMS) AP Commercial Shark member 2019-2021
NMFS HMS SouthEast Data, Assessment and Review (SEDAR) AP Pool member 2016-2021
South Atlantic Fishery Management Council (SAFMC) SEDAR AP Pool member no term limits
SAFMC Fisheries Citizen Science Program Participant 2016-2020
SAFMC Mackerel-Cobia AP FL Commercial member 2018-2021
SAFMC Snapper-Grouper (SG) AP FL Commercial member 2015-2021
SAFMC System Management Plan (SMP) Workgroup FL Commercial member 2018-2021
SAFMC Marine Protected Area (MPA) Expert Work Group (EWG) participant 2012-2013
Former SAFMC MPA AP FL Commercial member
Former NMFS Atlantic Large Whale Take Reduction Team FL participant (ALWTRT)
Former NMFS Bottlenose Dolphin Take Reduction Team FL participant (BDTRT)
Participant, observer and/or contributor to US coastal shark stock assessments during 1992, 1996, 1998, 2001, 2002, 2005, 2006, 2007, 2010-2015, 2017, 2019 and 2020.
Participant, observer and/or contributor SEDAR 11 (Large Coastal Sharks), 13 (Small Coastal Sharks), 16 (King Mackerel), 19 (Red Grouper/Black Grouper), 21 (Large Coastal Sharks/Small Coastal Sharks), 24 (Red Snapper), 25 (Black Sea Bass/Golden Tilefish), 28 (Spanish Mackerel/Cobia), 29 (Gulf Blacktip Sharks), 32 (~~Gray Triggerfish~~/Blueline Tilefish), 34 (Atlantic Sharpnose Sharks/Bonnethead Sharks), 36 (Snowy Grouper), 38 (King Mackerel), 39 (Smoothhound Sharks), 41 (Red Snapper/~~Gray Triggerfish~~), 50 (Blueline Tilefish), 53 (Red Grouper), 54 (Sandbar Sharks), 56 (Black Sea Bass), 65 (Atlantic Blacktip Sharks) and SEDAR 66 (Golden Tilefish).

Florida Fish and Wildlife Conservation Commission

Commissioners
Robert A. Spottswood
Chairman
Key West

Michael W. Sole
Vice Chairman
Tequesta

Joshua Kellam
Palm Beach Gardens

Gary Lester
Oxford

Gary Nicklaus
Jupiter

Sonya Rood
St. Augustine

Office of the Executive Director
Eric Sutton
Executive Director

Thomas H. Eason, Ph.D.
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

850-487-3796
850-921-5786 FAX

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: 850-488-4676

Hearing/speech-impaired:
800-955-8771 (T)
800 955-8770 (V)

MyFWC.com

March 1, 2019

Chris Oliver, Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
1315 East-West Highway, 14th Floor
Silver Spring, MD 20910

RE: MRIP Recalibration

Dear Chris:

Accurate information about angler effort, harvest and catch rates is necessary for proper management of our fisheries. The sustainability of these stocks is essential to provide for the economic and social benefits that are derived from them. The Florida Fish and Wildlife Conservation Commission (FWC) has concerns about the immediate use of the Marine Recreational Information Program (MRIP) Fishing Effort Survey (FES) effort estimates to calculate catch for the species managed by the Fishery Management Councils. While the survey methodology underlying the FES is clearly an improvement from that used for the Coastal Household Telephone Survey (CHTS), the initial effort estimates based on the FES are dramatically higher than historical estimates and implausible based on our understanding of Florida fisheries. Also, it is important to note that the magnitude of these effort estimates differs dramatically from those generated by NOAA Fisheries certified surveys conducted by the Gulf states. Due to concern over these differences, the Gulf of Mexico Fishery Management Council (GMFMC) and the South Atlantic Fishery Management Council (SAFMC) Scientific and Statistical Committees (SSC) have recommended a cautious approach when utilizing potentially conflicting estimates of harvest in stock assessments until these differences can be reconciled and corrected if necessary.

It is important that fisheries managers use the best available science when making decisions that impact fish stocks and the stakeholders that use these stocks. We believe that this process should include taking the time necessary to ensure that a newly implemented survey approach is generating plausible results free of bias. Although the National Academy of Sciences conducted a critical review of the methods used in the FES, we do not believe that the results of the survey are reliable. Fisheries managers already face a lack of confidence from stakeholders. It is important that the public is confident in the results of our data collection techniques so that managers' credibility is not further eroded. Additionally, the effect of the magnitude of changes of estimates of effort and harvest from the CHTS and FES to stock status and the allowable biological catch is unknown.

The magnitude of differences in new catch estimates generated from FES compared to those generated from the CHTS and some observations that we have made in Florida make us question the accuracy of these estimates. Some of these observations include:

- Different independent surveys conducted by Gulf states consistently generate substantially lower estimates of effort and catch than those generated from the FES. The Florida Gulf Reef Fish Survey, certified by NOAA Fisheries, and using a mail survey similar to the FES, estimated 1.2 million private/rental boat trips targeting ten reef fish species in the Gulf of Mexico in 2017. The FES generated estimate for **total** private/rental boat trips on Florida's west coast in 2017 was more than 18 million trips. Given the popularity of reef fish as target species off Florida's west coast, it is difficult to believe that only 6% of the boat-based trips in 2017 targeted these reef species on Florida's Gulf coast. Leading us to believe the FES greatly overestimated the number of trips.

- 2.3 million saltwater fishing licenses were sold in 2017 in Florida. Moreover, there may also be up to 40% of our anglers who are exempt. This would mean that we have about 4 million saltwater anglers. The number of trips estimated using the FES in Florida is approximately 80 million, meaning that on average, anglers fish 20 days per year. We do not believe that an average angler takes 20 fishing trips per year.
- FES generated statewide estimates of effort for shoreline anglers are four times as high as those estimated from CHTS. These estimates were seven times higher than those generated by CHTS on the Atlantic coast of Florida. The FES statewide estimates indicate that in 2017, there were **51.4 million shoreline trips** in Florida. This FES generated estimate equates to an **average of 4,000 trips per day** for each of Florida's 35 coastal counties or an **average of 65 trips per day for each mile** of tidal shoreline. We do not believe these estimates reflect reality.
- The 2016 National Survey of Hunting, Fishing, and Wildlife Associated Recreation conducted by the US Fish and Wildlife Service estimated that anglers 16 years old and older completed **61 million** saltwater trips **nationwide**. FES generated effort for 2017 indicates that there were over **80 million** saltwater fishing trips in Florida alone. The extreme lack of corroboration with this independent survey alone is enough to warrant further investigation into the veracity of the FES.

For the period 2000-2017, the estimates from the FES indicate that statewide trips are 2.8 to 3.9 times higher than previous estimates. This dramatic difference in fishing effort results in estimates of harvest that are far greater than what we had been managing for previously. For example, the new statewide estimate of the harvest of red snapper is double what it was for the old estimates. For inshore species, such as common snook, harvest estimates are more than triple those calculated previously.

In summary, we believe that there is ample evidence that the FES may be over-estimating fishing effort. We also believe that there should be a thorough analysis of the effect of these estimates on stock status and allocation before they are used for management of our fish stocks. Utilization of these estimates, that in some cases appear to be non-sensical will affect management decisions and further erode the public's confidence in a management process that already has lost public confidence. We are requesting that the FES generated estimates be reviewed thoroughly by a panel of statistical experts to ensure that the FES design is **functioning** as intended.

Thank you for your considerations. Please feel free to direct any questions or comments to Jessica McCawley in our Division of Marine Fisheries Management at (850)-617-9635.

Sincerely,

Thomas H. Eason

Thomas H. Eason, Ph.D.
Assistant Executive Director

Florida Fish and Wildlife Conservation Commission

Commissioners
Robert A. Spottswood
Chairman
Key West

Michael W. Sole
Vice Chairman
Tequesta

Joshua Kellam
Palm Beach Gardens

Gary Lester
Oxford

Gary Nicklaus
Jupiter

Sonya Rood
St. Augustine

Executive Staff
Eric Sutton
Executive Director

Thomas H. Eason, Ph.D.
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

Division of Marine Fisheries Management
Jessica McCawley
Director

(850) 487-0554
(850) 487-4847 FAX

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: 850-488-4676

Hearing/speech-impaired:
800-955-8771 (T)
800 955-8770 (V)

MyFWC.com

April 4, 2019

Dr. John T. Carmichael
Deputy Executive Director for Science & Statistics
South Atlantic Fisheries Management Council
John.Carmichael@safmc.net

RE: MRIP Recalibration

Dear Dr. Carmichael,

This letter is written in response to your March 21, 2019 email requesting that state agency representatives provide a letter to the South Atlantic Fishery Management Council's Science and Statistical Committee (SSC) about concerns with revised Marine Recreational Information Program (MRIP) estimates of fishing effort and catch. These concerns are outlined in the two attached letters.

We are appreciative of attempts to improve the procedures used by MRIP. However, estimates of recreational landings using the Fishing Effort Survey (FES) are not consistent with our experience and understanding of managed fisheries and unrealistic. In the two attached letters, we provide examples about why we think that the estimates generated from the FES defy common sense.

We do not believe that the estimates generated from the FES should be used to determine stock status, catch advice, or allocation decisions until potential biases causing these unrealistic estimates have been identified and the estimates have been corrected. Until this recalibration has been done, utilization of the FES generated estimates in assessments and for allocation decisions can lead to inappropriate stock status determinations and allocation formulations.

Please feel free to call me at (850)-251-2458 if you have any questions.

Sincerely,

James R. Estes
Deputy Director

Enclosure
cc: Jessica McCawley
Gil McRae
Luiz Barbieri

Florida Fish and Wildlife Conservation Commission

Commissioners
Robert A. Spottswood
Chairman
Key West

Michael W. Sole
Vice Chairman
Tequesta

Joshua Kellam
Palm Beach Gardens

Gary Lester
Oxford

Gary Nicklaus
Jupiter

Sonya Rood
St. Augustine

Office of the Executive Director
Eric Sutton
Executive Director

Thomas H. Eason, Ph.D.
Assistant Executive Director

Jennifer Fitzwater
Chief of Staff

850-487-3796
850-921-5786 FAX

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street
Tallahassee, Florida
32399-1600
Voice: 850-488-4676

Hearing/speech-impaired:
800-955-8771 (T)
800 955-8770 (V)

MyFWC.com

March 1, 2019

Jessica McCawley, Chairman
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

RE: MRIP Calibration

Dear Jessica:

Accurate information about angler effort, harvest and catch rates is necessary for proper management of our marine fisheries. The sustainability of these stocks is essential to provide for the economic and social benefits that are derived from them. The Florida Fish and Wildlife Conservation Commission (FWC) has concerns about the immediate use of the Marine Recreational Information Program (MRIP) Fishing Effort Survey (FES) effort estimates to calculate catch for the species managed by the South Atlantic Fishery Management Council (SAMFC). While the survey methodology underlying the FES is clearly an improvement from that used for the Coastal Household Telephone Survey (CHTS), the initial effort estimates based on the FES are dramatically higher than historical estimates and implausible based on our understanding of Florida fisheries. Also, it is important to note that the magnitude of these effort estimates differs dramatically from those generated by NOAA Fisheries certified surveys conducted by the Gulf states. Due to concern over these differences, the Gulf of Mexico Fishery Management Council (GMFMC) Scientific and Statistical Committee (SSC) has recommended a cautious approach when utilizing potentially conflicting estimates of harvest in stock assessments until these differences can be reconciled and corrected if necessary.

It is important that fisheries managers use the best available science when making decisions that impact fish stocks and the stakeholders that use these stocks. We believe that this process should include taking the time necessary to ensure that a newly implemented survey approach is generating plausible results free of bias. Although the National Academy of Sciences conducted a critical review of the methods used in the FES, we do not believe that the results of the survey are reliable. Fisheries managers already face a lack of confidence from stakeholders. It is important that the public is confident in the results of our data collection techniques so that managers' credibility is not further eroded. Additionally, the effect of the magnitude of changes of estimates of effort and harvest from the CHTS and FES to stock status and the allowable biological catch is unknown.

The magnitude of differences in new catch estimates generated from FES compared to those generated from the CHTS and some observations that we have made in Florida make us question the accuracy of these estimates. Some of these observations include:

- Different independent surveys conducted by Gulf states consistently generate substantially lower estimates of effort and catch than those generated from the FES. The Florida Gulf Reef Fish Survey, certified by NOAA Fisheries, and using a mail survey similar to the FES, estimated 1.2 million private/rental boat trips targeting ten reef fish species in the Gulf of Mexico in 2017. The FES generated estimate for **total** private/rental boat trips on Florida's west coast in 2017 was more than 18 million trips. Given the popularity of reef fish as target species off Florida's west coast, it is difficult to believe that only 6% of the boat-based trips in 2017 targeted these reef species on Florida's Gulf coast. Leading us to believe the FES greatly overestimated the number of trips.

- 2.3 million saltwater fishing licenses were sold in 2017 in Florida. Moreover, there may also be up to 40% of our anglers who are exempt. This would mean that we have about 4 million saltwater anglers. The number of trips estimated using the FES in Florida is approximately 80 million, meaning that on average, anglers fish 20 days per year. We do not believe that an average angler takes 20 fishing trips per year.
- FES generated statewide estimates of effort for shoreline anglers are four times as high as those estimated from CHTS. These estimates were seven times higher than those generated by CHTS on the Atlantic coast of Florida. The FES statewide estimates indicate that in 2017, there were **51.4 million shoreline trips** in Florida. This FES generated estimate equates to an **average of 4,000 trips per day** for each of Florida's 35 coastal counties or an **average of 65 trips per day for each mile** of tidal shoreline. We do not believe these estimates reflect reality.
- The 2016 National Survey of Hunting, Fishing, and Wildlife Associated Recreation conducted by the US Fish and Wildlife Service estimated that anglers 16 years old and older completed **61 million** saltwater trips **nationwide**. FES generated effort for 2017 indicates that there were over **80 million** saltwater fishing trips in Florida alone. The extreme lack of corroboration with this independent survey alone is enough to warrant further investigation into the veracity of the FES.

For the period 2000-2017, the estimates from the FES indicate that statewide trips are 2.8 to 3.9 times higher than previous estimates. This dramatic difference in fishing effort results in estimates of harvest that are far greater than what we had been managing for previously. For example, the new statewide estimate of the harvest of red snapper is double what it was for the old estimates. For inshore species, such as common snook, harvest estimates are more than triple those calculated previously.

In summary, we believe that there is ample evidence that the FES may be over-estimating fishing effort. We also believe that there should be a thorough analysis of the effect of these estimates on stock status and allocation before they are used for management of our fish stocks. Utilization of these estimates, that in some cases appear to be non-sensical, will affect management decisions and further erode the public's confidence in a management process that already has lost public confidence. These estimates need to be reviewed thoroughly by a panel of statistical experts to ensure that the FES design is **functioning** as intended. Also, the implications of using these estimates for management should be examined thoroughly through an extensive data workshop process on an individual species level. We plan to send a letter to NOAA to request that they embark on an analysis of potential biases associated with the FES that may be causing unrealistic estimates of effort.

We urge the SAMFC to pause in the use of FES generated estimates for management until the results of the FES can be fully reviewed and important issues are resolved.

Thank you for your considerations. Please feel free to direct any questions or comments to Jim Estes in our Division of Marine Fisheries Management at (850)-617-9622.

Sincerely,

Thomas H. Eason

Thomas H. Eason, Ph.D.
Assistant Executive Director

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, March 16, 2020 3:42 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Donald Kiesel

Email: kieseldb@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey, Delaware, Maryland, Virginia

Gear type(s) used:: Hook and line or handline

Comments: These fish range half the Atlantic. They go where they want when the want. While the catch isn't what it was, it has ebbed and rebounded several times in the 60 years I've been catching them. I do not believe the proposed rules under consideration will make one bit of difference overall. I do not believe changes are in order or necessary.

Further, there should absolutely no difference in the per person catch retention limit between private vessel fisherman and charter operators. That proposed rule was/is offensive and arrogant.

Your agencies are crushing the recreational fishing way of life and the businesses that support it.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Ed Daniels <ed.daniels@outlook.com> on behalf of Ed Daniels <ed.daniels@comcast.net>
Sent: Monday, February 10, 2020 11:43 AM
To: Seeley, Matthew
Subject: Bluefish catch limits

I'm a recreational fisherman and we catch and eat the blue fish. Whether or not the blue fish need to be restricted Depends 1st on Whether the fishing is causing the Problematic reduction in population. I understand that there are many elements that could be responsible for blue fish decline, but if recreational fishing or commercial fishing are exacerbating the problem then that needs to be restricted.
We catch and eat bluefish we catch, but if the choice is between Not catching and eating and not catching at all, I certainly will take the Former.

Edward Daniels, 10 Mary Rd, Eastham, MA 02642

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 10, 2020 12:58 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Edward Valentine

Email: ejv14@msn.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: The snapper fishing in the Manasquan Inlet and Stockton Lake was very poor last year. I don't know if there is a decline in the spawning process or if this was an aberation.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, January 13, 2020 10:41 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Name: George Horvath

Email: georgerhorvath@yahoo.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: I tagged 2,308 bluefish in NJ with American Littoral Society tags. 28 were recaptured from the Cape Cod Canal, MA, to Atlantic Beach, NC. There has been no fall bluefish run in the NJ surf for several years. A bluefish that I tagged in NJ was found in a NC fish market. Three bluefish that I tagged in Barnegat Inlet, NJ, were found in an Oyster Creek Nuclear Power Plant December fish kill. A bluefish that I tagged in Barnegat Inlet, NJ, in August was caught 7 miles East of Hatteras Inlet, NC, by a NC Division of Marine Fisheries Research Vessel in February. A bluefish that I tagged in Barnegat Inlet, NJ, in June was found dead in a VA marsh in April. If commercial fishermen don't report the tagged fish that they catch, their net license should be revoked.

(Sent via *Mid-Atlantic Fishery Management Council*)

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY • BRUNSWICK, GA 31520 • 912.264.7218
COASTALGADNR.ORG

MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

March 12, 2020

Dr. Christopher Moore, Executive Director
Mid-Atlantic Fisheries Management Council
800 North State Street, Suite 201
Dover, DE 19901

Dr. Moore,

Thank you for the opportunity to comment on the joint amendment for the Atlantic Coast Fishery Management Plan for Bluefish. Georgia requests the MAFMC and Commission consider amending the definition of *de minimis* to include recreational landings and to relax regulatory requirements for *de minimis* states.

Georgia's recreational fishery for Bluefish is minimal. Directed recreational trips where Bluefish were identified as the primary target account for less than 0.5% of the total trips in each of the last three fishing years (2016 - 2018). During each of the last ten years, the annual harvest levels have been well below 1%, ranging from 0.01% to 0.53%, of the coastwide harvest.

Based on the Commission's Interstate Fisheries Management Program Charter (ISFMP, Feb. 2016) definition "*(l) De minimis - A situation in which, under existing conditions of the stock and scope of the fishery, conservation, and enforcement actions taken by an individual state would be expected to contribute insignificantly to a coastwide conservation program required by an FMP or amendment,*" we are asking the MAFMC and Commission to consider including recreational *de minimis* which would exempt such states from regulatory requirements as those conservation measures would be insignificant.

The ISFMP Policy Board discussed, in August 2007, standardization of *de minimis* definitions including conditioning for commercial or recreational or combined and which component a state could request *de minimis*. Precedent exists in other fisheries where commercial and recreational landings have been used either separately (e.g., Atlantic Croaker) or in combination (e.g., horseshoe crab, American Eel, Black Drum). It was suggested in the minutes of that meeting that if the Commission's management board wanted to make changes to *de minimis* in an FMP, it could be done through an amendment/addendum. Our hope is that a similar process may be available through the MAFMC.

Thank you for your consideration,

Doug Haymans

Cc: Dr. Carolyn Belcher – Chief of Marine Fisheries, GADNR CRD
Spud Woodward – Georgia Legislative Appointee
Toni Kerns / Bob Beal – ASMFC

From: Gerald Audet <geraldnaudet@gmail.com>
Sent: Thursday, February 13, 2020 10:08 AM
To: Seeley, Matthew
Subject: Bluefish Comment

Hello
I would like to comment on blue fish regulations. First, **I am in support of new regulations limiting harvest and new regulations decreasing daily limits on Bluefish, coast wide.**

As to the the specific points MAFMC has asked the public to comment on:

Are the existing goals and objectives appropriate for managing the bluefish fishery? No. While I applaud the action to decrease harvest, more focus needs to be put into angler education and decreasing dead discards and release mortality. Further, the decrease in comm harvest will likely not be sufficient to rebound the fishery quickly.

Is the existing allocation between the commercial and recreational sectors based on the annual catch limit appropriate for managing the bluefish fishery?

No. Recreational anglers are provided with a disproportional smaller opportunity to access the fishery. There needs to be a shift away from commercial harvest to provide better equity between rec and comm anglers.

Are the existing commercial state allocations appropriate for managing the bluefish fishery? No comment, I do not have enough information.

Are the existing transfer processes appropriate for managing the bluefish fishery? No. The bluefish should be managed with regards to other fisheries and as a biological system. Simply transferring fish from comm to rec or otherwise is not addressing this issue.

What is the appropriate approach to take for rebuilding? First, environmental protection of the Bluefish habitat is critical. Next, we need better data as to population dynamics and distribution. Next, reduction of the comm harvest of bluefish needs to be implemented, with even tighter standards and further reductions- at least in the short term, if not the long term. Finally, increased angler education as to proper release of fish for maximum discard survivability.

Thank you for allowing me to comment

Dr. Gerald Audet, PhD

Douglas, MA

From: Gerald Audet <geraldnaudet@gmail.com>
Sent: Monday, March 16, 2020 4:34 PM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments

ATTN Dr. Christopher Moore

I am sending my comments as to Bluefish Management.
1) Are existing goals and objectives appropriate for managing the bluefish fishery?
No. Bluefish and Striped Bass should be managed for abundance, not yield. They should also be managed as part of the biological system, not as individual species.

2) Is the existing allocation between the commercial and recreational sectors based on the annual catch limit appropriate for managing the bluefish fishery?
No. Commercial sector has too great a stake in the fishery, and too substantial a take.

3) Are the existing commercial state allocation approproireate for the managing the bluefish fishery?
No comment

4) Are the existing transfer processes appropriate for managing the bluefish fishery?
No. Again, commercial sectors have disproportional access and harvest.

5) What is the appropriate approach to take for rebuilding?
WE should be managing for an equitable fishery that is managed on an ecosystem scale, not on a species. WE should be attempting to rebuild the fishery as quickly as possible, whatever that cost- this means more quickly than a 10 year or 5 year timeline. Harvest across all sectors should be substantially reduced. Further, environmental concerns- like spawning habitat and forage availability- should be addressed beyond simple reductions in harvest.

Thank you for this opportunity to comment
Dr. Gerald Audet
Douglas, MA

From: Germain Cloutier <stripedbassking@yahoo.com>
Sent: Wednesday, March 4, 2020 6:39 PM
To: Seeley, Matthew
Subject: Bluefish

Hello,
With Bluefish Stocks falling, it is evident that they are overfished. It is not in the best interest of the species to be adding to the commercial harvest of Bluefish and taking away from the recreational side like what was done in the past. The action needed it cuts on all fronts to ensure that this great gamefish is able to survive and give anglers a good fight. Bluefish can save many anglers efforts when Striped bass are hard to find(since their numbers are also falling).

Thank you,
Germain

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, January 29, 2020 10:19 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Gil Hawkins

Email: gilhawkins@verizon.net

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New York, New Jersey

Gear type(s) used:: Hook and line or handline

Comments: I am against the 3 bag limit on blue fish. There are many reasons. One is every child remembers taking home a catch if snapper blues. Three fish doesn't make a meal. Two, blue fish are self destructive in a boil. Is half a fish a catch? The idea of spending fuel or going to the beach to catch 3 fish is ludicrous. Fish over five pounds are not good eating so limit the size not the bag limit. Gil Hawkins. Past President Hudson River Fishermen's Association.

(Sent via *Mid-Atlantic Fishery Management Council*)

The Great Egg Harbor Watershed Association & River Council

Fred Akers - Administrator
P.O. Box 109
Newtonville, NJ 08346
856-697-6114
Fred_akers@gehwa.org

March 17, 2020

Dr. Christopher Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE 19901
(Sent via email, electronic copy attached)

RE: Bluefish Scoping Comments

Dear Dr. Moore:

Recreational values are an important Outstanding Resource Value for the Great Egg Harbor National Scenic and Recreational River and National Park, and marine fishing is a very popular recreational activity in the tidal river and estuary.

Bluefish are a very popular game fish in our system, so we offer you the following comments regarding the Scoping to update the bluefish FMP.

ISSUE 1: FMP GOALS AND OBJECTIVES

We think that the existing objectives as stated below are very comprehensive and still very appropriate for managing the bluefish fishery:

1. Increase understanding of the stock and of the fishery.
2. Provide the highest availability of bluefish to U.S. fishermen while maintaining, within limits, traditional uses of bluefish (defined as the commercial fishery not exceeding 20% of the total catch).
3. Provide for cooperation among the coastal states, the various regional marine fishery management councils, and federal agencies involved along the coast to enhance the management of bluefish throughout its range.
4. Promote compatible management regulations between State and Federal jurisdictions.
5. Prevent recruitment overfishing.
6. Reduce the waste in both the commercial and recreational fisheries

ISSUE 2: COMMERCIAL AND RECREATIONAL ALLOCATIONS

Given that the characteristics and participation in both the commercial and recreational fisheries has changed over the last 20 years, and especially in light

of the MRIP changes, the commercial and recreational allocations should be revised.

The commercial/recreational split should be updated based on the new MRIP data as shown in the scoping video table where the 38 year average from 1981-2018, the 10 year average from 2009-2018, the 5 year average from 2014 to 2018, and the 3 year average from 2016 to 2018 are all the same at 87% recreational and 13% commercial.

ISSUE 6: OTHER ISSUES

There are many important management considerations that the bluefish FMP must consider, and we highlight the following 2 issues of concern:

1. Ecosystem approaches to bluefish management – given the changes in distribution of bluefish caused by temperature changes and other ecosystem changes brought on by climate change, ecosystem approaches to managing bluefish need to be developed and implemented.

2. Economic characteristics of the fishery – given the management changes to the recreational fishery with sector splitting and the resulting drastic decrease in the bag limit from 15 fish to 3 fish for private anglers after 20 years of the 15 fish bag limit, fishery managers need to revisit the economic characteristics of the bluefish fishery and identify the economic costs and economic changes to the fishery from new and significant management changes.

The economic characteristics of the fishery were an important and informative component of both the 1990 Bluefish FMP and the 1998 Amendments. Below are 2 excerpts from the 1990 FMP, and attached is the 9 page economic characteristics of the fishery in the 1998 Amendment:

8.0. DESCRIPTION OF ECONOMIC CHARACTERISTICS OF THE FISHERY (From May 1989 FMP p27)

Because of the importance of bluefish to recreational anglers, a decline in expenditures by these anglers as a result of bluefish management measures would impact the sales, service, and manufacturing sectors of the recreational fishing industry. In 1985, Atlantic coast direct sales related to recreational fishing amounted to $2.6 billion (Table 32). These sales and services required 42 thousand person years of labor and generated wages of $522 million (SFI 1988a).

APPENDIX 1. ALTERNATIVES FOR THE PROPOSED FMP (from May 1989 FMP)

2.1.2. Analysis

Approximately 79% of successful coastwide anglers landed 5 or less bluefish per trip in 1987 {Table 40). Potentially, this possession limit could affect 21% of the recreational effort, resulting in a significant decrease in the economic surplus associated with recreational fishing and adversely impacting expenditures, income and employment in associated and dependent industries.

Thank you for this opportunity to comment on the future of bluefish management.

Respectfully

Fred Akers

Fred Akers

Appendix: Amendment 1 to the Bluefish Fishery Management Plan (Pg. 99-107)

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 11:53 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Greg duckworth

Email: truetwistreap@yahoo.com

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Gillnet

Comments: More people are eating bluefish now. It should be made more available to the general public in the marketplace by increasing the commercial quota. The commercial quota needs to be increases to 30 or 40 percent. The minimum size of bluefish should likewise be increased to 18 inches . There needs to be more quota transferred to the northern states from the southern states for commercial quota. FISH ARE FOOD NOT TOYS.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Greg Ludlum <fishingpierman@yahoo.com>
Sent: Wednesday, February 26, 2020 9:38 AM
To: Seeley, Matthew
Subject: blue fish seaview fishing pier

Greg ludlum seaview fishing pier I was doing some reading on the blue fish rule and not happy at all about it but that beside the point all I want is fairness I was reading the rule set out part 600 of the magnuson -steven act 600.325 I thing we need go back and look this is a true violation under standard #4 because out off the 400000 thousand people that fish on north Carolina piers are 40%other than white 15% seniors citizens approx. 5%disable not only to say lower income it is in true violation I would love to have your input in this matter thanks greg ludlum

Sent from Mail for Windows 10

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 3, 2020 9:55 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: greg ludlum

Email: fishingpierman@yahoo.com

How would you describe your primary role in the fishery?: Other

Primary state(s) you land bluefish in:: North Carolina

Gear type(s) used::

Comments: Greg Ludlum owner seaview fishing pier north topsail beach
I know I'm not supposed to use this for bag limits but it need to be said, you cannot discriminate against people who can not afford a for hire boat.This rule does just that as a pier owner in north Carolina you must
consider the ADA ,seniors and the poor that have no where to fish. this is a true discriminative ruling ,please pass it on to whom ever needs to read it thanks Greg Ludlum

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Vetcraft <vetcraft@aol.com>
Sent: Tuesday, January 14, 2020 9:43 AM
To: Seeley, Matthew
Subject: Bluefish scoping comments

With the stock overfished but overfishing not occurring, it would seem logical that the biomass had depleted before we became aware of it. It has been my observation that we started seeing the decline of the stock in the Nee Jersey area where I fish, over a decade ago.

Bluefish are a significant contributor to the recreational sector and we should make all efforts to keep the quota at reasonable amounts. New MRIP calculations should allow a greater % to be allocated to the recreational sector.

In order to rebuild the stock I would immediately suspend any recreational to commercial quota shifts as allowed under amendment 1. I would further recommend suspending state to state transfer quotas as allowed under amendment one. This will help reduce regional depletions which will occur when state specific quotas become unbalanced over the range of a stock.

Although no figures were given on the value of bluefish to the commercial sector, in the past I have seen very low ex vessel price per pound figures. The above suggestions should help the stock rebound without being unfair

I would also keep in mind the stock decline may be cyclical and unrelated to F.

Dr Harvey Yenkinson
AP advisor fluke, sea bass, scup
Sent from my iPhone

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, January 31, 2020 1:00 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Ivan Garcia

Email: caprichos4@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: the snapper bluefish should be exempt. bluefish for shark bait also exempt

(Sent via *Mid-Atlantic Fishery Management Council*)

ROUGHLY 16 18 MILLION AMERICANS FISH FRESH & SALT WATER.
PRECENTAGE WISE THE ALLOCATION SPLIT DOES NOT PROVIDE THE NON FISHING AMERICAN PUBLIC THE CORRECT PRECENTAGE OF FISH **[HARVESTER BY COMMERCIAL FISHERMEN] PERHAPS COUNCIL WOULD EXPLAIN IMPORTS IN SCOPING DOCUMENT.**

WHY HAS COUNCIL POLICY & SCOPING RESULTED IN 92% TO 93% OF SEAFOOD CONSUMMED IN AMERICA BEING IMPORTED?
SCOPING SHOULD ADDRESS WHY THE COUNTRY WITH SECOND LARGEST EEZ IN WORLD IMPORT 92% TO 93% CONSUMMED SEAFOOD?
WHAT IS COUNCIL POLICY FOR OCEAN RANCHING?
WHERE IS A COUNCIL FISHERY MANAGEMENT PLAN FOR AQUACULTURE IN EEZ?
WHERE IS COUNCIL SCOPING FOR TOTAL RETENTION FOR RECREATIONAL CAUGHT BLUEFISH & ALL FISH ? Atlantic States Marine Fisheries Commission ARTICAL 1 PREVENT WASTE OF FISH FROM ANY MEANS MUST BE DISCUSSED IN BLUEFISH SCOPING; SCOPING WILL NOT DISCUSS Atlantic States Marine Fisheries Commission PREVENTION OF PHYSICAL WASTE!
WILL COUNCIL DISCUSS TOTAL UTILIZATION FOR RECREATIONAL CAUGHT BLUEFISH?
WILL Atlantic States Marine Fisheries Commission DISCUSS ARTICLE 1 SECTION 1 PREVENT PHYSICAL DURING SCOPING ?

KNOWING THESE SCOPING COMMENTS WILL NOT REACH COUNCIL DISCUSSION BRING DISALISIONMENT WITH scoping Atlantic States Marine Fisheries Commission & Council PROCESS.
United National Fisherman's Association 123 Apple Rd. Manns Harbor NC 27953.

SCOPING DOCUMENT BLUEFISH

Council has a risk policy. Scoping should ask council to publicly state a utilization policy on all recreational caught fish. NO DISCARDS!
IMPLEMENTING
Scoping should require a recreational smart phone or reporting procedure prior to going fishing & on returning to land. [prior so law enforcement can enforce] BLUEFISH SHOULD REQUIRE STATES TO REQUIRE PHONE REPORTING PRIOR TO GOING FISHING. (lot of shore fishing) North Carolina may have such a app. TILE FISH MANDATORY REPORTING **IS A JOKE!** WITH NO ENFORCEMENT NO FINES! **A JOKE!**
Scoping must have a barbless hook requirement; for all recreational fishing. [ALL SPECIES] WOULD REDUCE NUMBER OF LINES IN WATER! Bluefish has higher release rates, barbless hooks would reduce dead fish.
Scoping must require a total length as a part of total utilization. IF NOAA DATA IS CORRECT 2/3 OF ALL RECREATIONAL TRIPS ARE SHORE SIDE this convert discards to landings. [reducing Council & Atlantic States Marine Fisheries Commission policy of targeting large females!] DATA ON BLUEFISH DOES NOT ADDRESS THE CYCLE OF FISH FROM EAST COAST TO AFRICA. (EAST COAST STOCK SCIENCEIS INCORRECT)
Council recognizes chub mackerel are transatlantic WHY NOT BLUEFISH? **JOKE SCIENCE!**
NEED SATELLITE TRACKING TAGS ON LARGE FISH. NOAA tracks sharks spend money tracking transatlantic for bluefish. Method of survey on bluefish is worse than dogfish which survey missed 80% of dogfish. Survey probably missing greater number of bluefish in trawl due to bucket effect.
CONPAIRSON OF NEMAP & SCIENCE CENTER CATCH OF BLUEFISH CAUSES A QUESTION! WHY DOES SCIENCE CENTER NOT CATCH SMALL BLUEFISH AT SAME ABUNDANCE?
A QUESTION AT SCOPING IS *** WAS IT POSSIBLE SOMEONE WAS MUMPLIPATING NUMBERS TO BE CONSERVATION RADICALS? ******** [example the lynx hair DNA] ****
Scoping document shows dead discards all documents **MUST SHOW TOTAL DISCARDS! [especially bluefish] NOT SHOWING ALL DISCARDS ON GRAPH IS AS MENTIONED ABOVE DISHONIST MANAGENENT.**
Scoping document shows landings decline in in cyclical patterns, perhaps the introduction of man made chemicals at the mud hole due to sludge dumping & effects of birth control chemicals accumulating in sounds & rivers reducing reproduction. A dead zone off NJ is much the same as in Gulf of Mexico yet scoping does not mention reproduction from eggs. SCOPING SHOULD ADDRESS CHEMICALS AFFECTING REPRODUCTION OF ALL FISH.
Scoping should endorse ocean ranching of of BLUEFISH [Though cannibalistic blue fish may be a ocean ranching fish. SCOPING SHOULD INCLUDE DISCUSSION FOR BLUEFISH. (HERPAPS BY PRIVATE ENTERPRISE) [SPAWING & RELEASING MOSTLY FEMALE BLUEFISH FISH COULD REVERSE COUNCIL POLICY OF ELIMINATION OF FASTER GROWING FEMALE FISH] SCIENCE: YEAR CLASSES OF MOSTLY FEMALE FISH SHOULD PRODUCE MORE SPAWN. **** READ YAMAHA FISHERY JOURNAL FOR SPECIES LIKE BLUEFISH AVAILABLE ON INTERNET ****

SCOPING MUST ADDRESS Intercepts of recreational fishing from EEZ returning to private docks. Law enforcement seldom encounter these vessels for enforcement. [smart phone above] representing 80% of recreational fishing in EEZ! WOULD REPORT!

2%
Diltiazem
Antihypertensive
(0.93 nanograms per gram of fish fillet tested)
Carbamazepine
46%
Norfluoxetine
Antidepressant byproduct
(3.2 nanograms/gram)
20%
Diphenhydramine
33%
Carbamazepin
Fish Pharm
These pills represent the relative amounts of four pharmaceutical drugs found in fish pulled from Chicago's North Shore Channel and tested by Baylor scientists.
The traditional foe of water quality is waste from factor
and farms, but now environmental regulators are eyein
pollution sources: our medicine chests. Fish caught dow
from sewage treatment plants in five U.S. cities contain
of pharmaceuticals and toiletries. Baylor University re
found in a recent study. You'd have to eat tons of fish
small concentration to affect human health, b the
could worsen threats to marine life. To assess the risk
has scientists monitoring 150 lakes with results du

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, March 16, 2020 7:35 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: jason jarvis

Email: buddhajay108@yaho.com

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Hook and line or handline

Comments: i am one of the commercial representatives on the RIMFC. There is overwhelming opposition from RI commercial fishermen and their stakeholders on adjusting allocation using skewed MRIP data. To use random data from random recreational fishermen that have zero accountability to report true landings is absurd. Lets make mandatory reporting for recreational fishermen ,and then come up with real numbers and real data . Not some random estimate pulled out of the air.Its absolutely absurd to hold the for hire sector and commercial sectors accountable for their catch reports ,yet recreational fishermen have more say without accountability. This is a joke and could quite possibly lead to a lawsuit.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Jean Public
To: Seeley, Matthew; information@sierraclub.org; info@pewtrusts.org; info@peta.org; info@idausa.org; info@cok.net; info@nyclass.org; info@earthjustice.org
Subject: Fw: Supplemental Scoping Hearings Scheduled for Bluefish Allocation and Rebuilding Amendment public comemnt on this notice
Date: Monday, January 13, 2020 6:03:16 PM

your allocations are much too large leading to overfishing. cut all quotas you have established by 50% immediately to avoid explotation. we cannot continue to overfish. Ithis comment is for the public record jean publiee jean public1@yahoo.com

From: Squarespace <no-reply@squarespace.info>
Sent: Thursday, March 5, 2020 4:54 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: jerry spooner

Email: jspnr40@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: this is going to hurt the boat rental tackle shops and motels i also use snapper blues for bait and take kids fishing for them as it is the only fish they can catch with no size limit

(Sent via *Mid-Atlantic Fishery Management Council*)

Jersey Coast Anglers Association
Working for Marine Recreational Anglers
1594 Lakewood Road, Unit 13, Toms River, NJ 08755
TEL.: 732-506-6565 - FAX: 732-506-6975

Chris Moore, PH.D. Executive Director
Mid-Atlantic Fishery Management Council
Dover, DE 19901

Dear Director Moore,

I am writing on behalf of the Jersey Coast Anglers Association which represents approximately 75 fishing clubs and many thousands of fishermen throughout our state. We are thankful that you held scoping meetings and are accepting comments in regard to the Bluefish Allocation and Rebuilding Amendment to the Bluefish Fishery Management Plan. We would like to offer the following comments regarding the amendment.

Issue 1: FMP Goals and Objectives – We believe the existing objectives are still appropriate for managing our bluefish fishery today. However, the SSB target on 200,000 MT seems too high. Figure 1 in the scoping document shows that the target has not been achieved at least since 1985 which is the fist year included in the chart. Why not make a more realistic target?

Issue 2: Commercial and Recreational Allocations – We understand that the quota split between the two sectors was amended through Amendment 1 in 1999 and based on landings from 1981-1989. At that time, it was adjusted to 83% recreational and 17% commercial. However, due to the recently re-calibrated MRIP numbers, we have learned that recreational fishermen removed more fish than originally thought. That resulted in a determination that the recreational sector accounted for 90% of the removals and the commercial sector 10%. Therefore, it stands to reason that the quota split needs to be adjusted to 90/10 as that is what was actually happening over the years on which the quotas were based. Below is an example of what could happen due to the recalibrated MRIP numbers:

Suppose the commercial sector was given a quota 20,000,000 lbs. With the 83/17 split under the old MRIP numbers that would mean that the recreational sector caught 5.88x that amount which would be 117,600,000 lbs. However, under the recalibrated MRIP numbers there is a 90/10 split that would mean that the recreational sector caught 9x as many fish as the commercial sector which would be 180,000,000. Therefore, under the old MRIP numbers the total between both sectors would be 137,000,000 lbs. and under the new MRIP numbers the total would be 200,000,000 lbs. Now, let's suppose that because of the recalibrated MRIP numbers, it is determined that the biomass is larger

than what was thought so it is still Ok to remove 200,000,000 lbs. from the biomass. Remember, that the new MRIP numbers show that the recreational sector is responsible for 90% of the removals. If we leave the split at 83/17 that would result in the commercial sector getting an increase from 20,000,000 lbs to 34,000,000 while the recreational sector would get a decrease from 180,000,000 lbs. to 166,000,000 lbs. The end result is that the commercial sector would get a 70% increase while the recreational sector would be decreased by 9.2%. That would be very unfair especially at a time when the recreational sector already has very strict regulations.

From 2001-2018, 77.617 million pounds of the recreational quota was transferred to the commercial sector. We have been told that not all of the transferred quota was used, but still, why was this done? Exactly how much of this transferred quota was used? These were fish that the recreational sector may have chosen to conserve but were instead transferred to the commercial sector. Now, due to the apparent mismanagement of the species, the private sector is restricted to just 3 bluefish per person per day. Do you have any idea of how negatively those restrictive measures will impact our shore economy? Bait and tackle stores, marinas, private and for-hire boats and many more businesses will suffer. What about the sustenance fishermen and kids fishing for snappers from the docks of our bays? Many kids learn how to fish by catching snappers and now even they are being virtually shut out of this fishery. Kids are the future of our sport!

Issue 3: Commercial Allocations to the States: We believe that the existing state allocations are fair. New Jersey's commercial allocation should not be reduced.

Issue 4: Quota Transfers: We are strongly opposed to any transfer of the recreational sector to the commercial sector. In fact, any transfers at all, including state-to-state transfers, of the commercial quota should be stopped until the stocks are rebuilt.

Issue 5: Rebuilding Plan: It seems that one of the only things the Council can do to help restore the fishery is to establish lower quotas and more restrictive regulations. However, to lessen the impact to the many businesses that depend on this fishery, we recommend the development of a 10-year plan as opposed to trying to rebuild the fishery through a 3- or 5-year plan.

Issue 6: Other Issues: It would be great if we could stop the destruction of our marine environment through sand mining and beach replenishment. This has destroyed various lumps that both forage and gamefish depended on. It has also buried marine life and destroyed habitat along our shoreline. We should do anything we can to improve habitat. We also support an eco-system management approach to our various fisheries. Action should be taken to increase our forage species and studies should also be done to determine the effects that climate change and warmer water is having on this species.

Respectfully submitted,

John Toth, JCAA President

From: jim Manzolli <comanche327@gmail.com>
Sent: Friday, January 31, 2020 2:55 PM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments

I am a 78 year old angler, from Stratford Ct. Caught my first blue fish in 1964 and do all my fishing within a 15 mile radius of the Housatonic River on Long Island Sound.
My initial thoughts are "it's about time" this fishery, in my area, has been in decline for the past 10 years, and has accelerated in the past 5 years. I realize I am one angler fishing in a very small area, but having spent over 50 years in one spot I feel I have a pretty good gauge of what I have observed.
Here are some of my so not scientific observations;

1. Our yacht club has not had a "kids snapper contest" off our dock in the past 4 years… no snapper are here to catch. (Always was catch , measure and release)
2. My club is part of a 12 club Blues tournament held for the past 40 years. Typically 10 boats per club. Each boat would weight in 3 Blues, and the winning club based on weight of the highest 5 boats per club. Typical winning club weight would be 70 to 90 lbs. The last three years the winning weight was under 50 lbs. Last year my club won with 34 pounds of fish along with a minimum length of 20 inches.
3. On a clear calm day you can see pods of bunker moving with the tide and nothing pushing them. Ten years ago Blues were feasting on them.

My vote is for the three fish rule with a 12 inch size restriction. I don't know one person who caught snappers and actually ate them. Usually used for bait or who knows what.

"The stock was over fished but not experiencing over fishing" time for the experts to put down the pencil and paper and spend time in the field with actual anglers.

Thank you,
Jim Manzolli

Ona side note, I remember Striped Bass in the 80's with a 40inch minimum keeper, seems we are heading in that direction again..

Sent from Mail for Windows 10

From: Squarespace <no-reply@squarespace.info>
Sent: Saturday, February 22, 2020 9:51 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: John Cooper

Email: coopie@juno.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New York, New Jersey

Gear type(s) used:: Hook and line or handline

Comments: Ok we need minnimums and bag limits on everything.

Fishermen are mostly greedy and ignorant.

Kingfish
Bluefish
Triggerfish
Every fish needs minnimums & bag limits.
Bait fish bait crabs help save the earth.

When will we stop trawling on the bottom?

I know this may be outside the survey.

I do not deal with paperwork well.

John Cooper

New York, New Jersey & Florida.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 10, 2020 2:09 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: John Fago

Email: jfago100@comcast.net

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey, Florida

Gear type(s) used:: Hook and line or handline

Comments: The current quota in NJ is 15 bluefish. The limit should be reduced to 8-10 fish per day.. I have been fishing over 50 yrs and no one keeps 15 fish. Most anglers will keep 1-3 for consumption.. The issue is the Asian fishermen who take over their quota either to sell or distribute in their community.

I fish over 200 days a year in NJ and Florida and have seen illegal harvest of bluefish time and time again because Fish and Game are so understaffed that patrolling the jetty's, piers and bulkheads is nearly impossible

The issue is on land not on party boats or charter boats

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 2:34 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: John LaFountain

Email: foxseafood@gmail.com

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in::

Gear type(s) used::

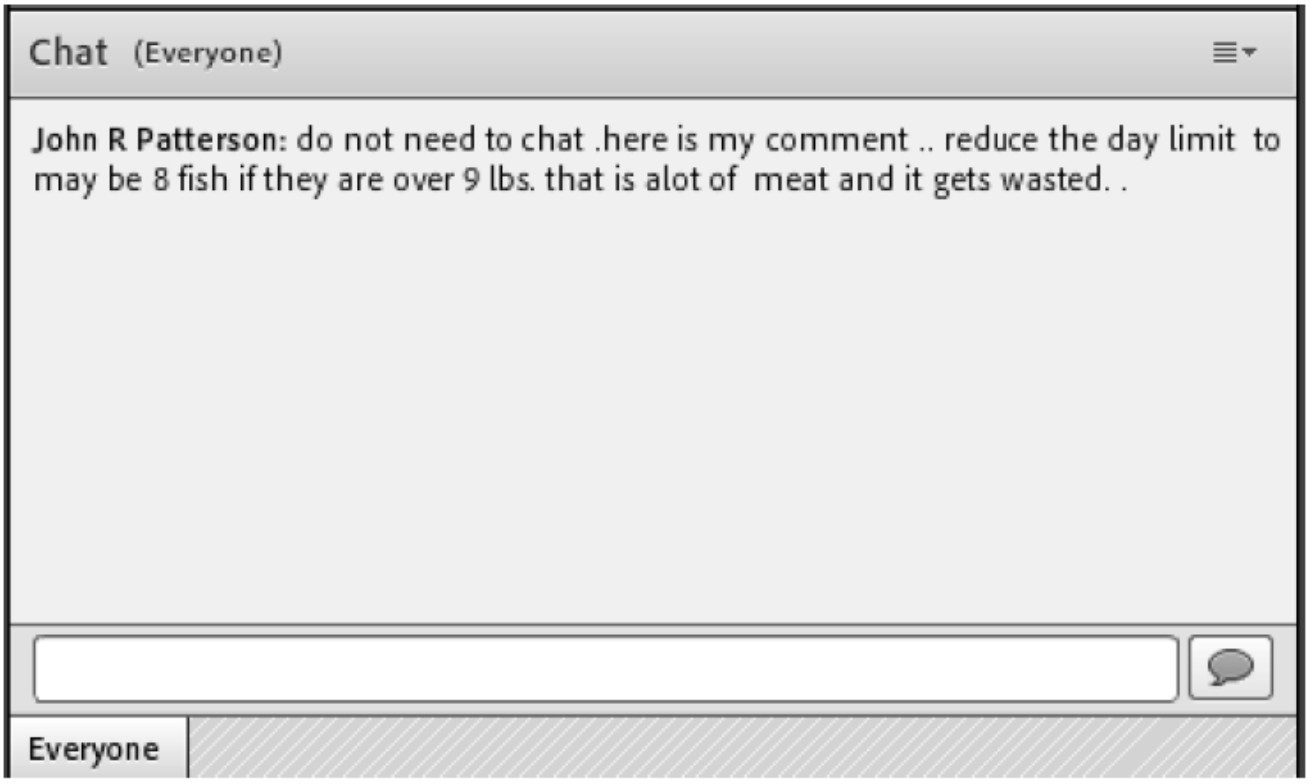
Comments: Hello,

- Commercial/recreational allocations -based on the graph that was presented at the scoping hearing it looked as if the commercial side used to get a higher percentage of fish and has dwindled down now to 13%. Considering the reduced quota I think that this now needs to be adjusted .I fear the Commercial fisherman that have high stakes in the bluefish fishery as a means of living can longer make it with the quota. My company Fox Seafood Inc in Narragansett Rhode Island purchases a lot of the bluefish landed in the state and we pay a good or it. We smoked it and sell it the fish markets and independent grocery stores. We purchase mostly in the fall when the fish are large , fatty and abundant here in Rhode Island. If the quota goes to 180,000 pounds roughly what is proposed that quota will be used up by September and all those beautiful , large mature fish fish will swim right past us. And we will effectively be out of business as it makes up for 40% of our sales. Also we are the largest producer of smoked bluefish, there is only one other company that does it much of it. We want to keep this New England tradition going. We are a family run business that sells to family business all over New England. We want to see local fish available at our fish markets here in Rhode Island. It is not just a game fish . It is food that is vital to our community and supports jobs and businesses in New England. I think the new estimates of what anglers are catching is grossly over estimated. We have heard for it least the past few years that the for -hire boats and recreation
guys are not catching fish. So again what I propose is take all years percentages and average it out so the commercial side gets a higher percentage that is in line with what it was historically. We need more than 180,000 lbs . If we had 25% percent of the over all quota instead of 13% we could make it work and keep all invested commercially going for now.

-Allocations to the states- We believe that Rhode Island's bluefish fishery in healthier than the southern states. In particular from New Jersey to North Carolina. The fish that are landed in Virginia and North Carolina are all very small fish that have not had a chance to reproduce .We need to do something about the size limits or this fishery will be gone . I purchased fish from those 2 states for the last 12 years . They have always had the largest fatty fish landed on the East Coast. Not in the last 5 years and in particular the last 3 years zero large bluefish. What they are catching is destroying the ability for the fishery to recover. There should be a permanent reallocation of some quota to the Northern states and a size limit in place.

Thank you for considering my comments.

Regards,
John G LaFountain
Fox Seafood Inc.



From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 17, 2020 9:28 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: john pendergast

Email: jwpeng57@msn.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: I think that measures need to be taken to keep commercial fishermen and industries from netting bluefish and other spiecies such as floudner , weakfish. Measures such as a ban on catching these fish until they are plentiful again.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, February 5, 2020 4:01 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Louis Tocci

Email: onecrab2041@yahoo.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New York, New Jersey

Gear type(s) used:: Hook and line or handline

Comments: I don't think there is a problem with blue fish i just believe they are farther off shore than before as we have so much bait out there they don't need to come in shore to feed i have also seen less snappers in the river in the past 5 years but i also have seen the big breaders in the last 3 years in the rivers and I'm talking about the Shrewsbury and navesink rivers in New Jersey

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, January 20, 2020 8:36 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Mac Currin

Email: maccurrin@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: North Carolina

Gear type(s) used:: Hook and line or handline

Comments: Do want is necessary to rebuild this stock as soon as possible since it is vitally important to the recreational sector,

Maybe this time the MAFMC will not allow transfer of rec quota to the commercial sector- I sure hope so. I have asked you folks each and every time you have modified the bluefish plan over the past 10 years, to eliminate this option but it has always remained and recreational quota has been transferred to the commercial sector most if not all years. PLEASE END this. There is no sane reason that recreational anglers should not be allowed to "bank" fish if they choose to do so by catch and release. Instead, the MAFMC transferred quota to the commercial sector every year the rec sector was not projected to harvest it's allocation. If you had not done so, maybe the rec sector would not have to take such a drastic reduction in harvest under this amendment.

Please do the right thing this time.

Mac Currin
Raleigh, NC

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 3, 2020 9:34 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Marc Chiappini

Email: chipnsnj@yahoo.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey, Delaware

Gear type(s) used:: Hook and line or handline

Comments: Blue Fish have been a staple recently as a fish you could take daily. Their numbers in Delaware Bay have been great, so why the limits now?
But, if you put limits on, keep them the same for commercial head boats and private boaters. It is not fair to give commercial operators an advantage in limits over those of us that operate and own our own boat.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Thursday, February 27, 2020 9:38 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Mateusz Brodka

Email: brodkamatt@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New York

Gear type(s) used:: Hook and line or handline

Comments: Im usually fishing for bf in May from shore- beach and saw a decline in numbers over the course of 4 years. It would be good to consider smaller bag limit. Also it would be beneficial for researchers to do surveys to determine if bf have declined in numbers.

I'm interested if anyone has any statistics

Thank you
-Matt

(Sent via *Mid-Atlantic Fishery Management Council*)

Michael Pirri
2-26-2020

Never in my fishing career have I experienced more volatility with fishing regulations than now, tonight, here in 2020. Scup, Seabass, Striped Bass, Bluefish, Fluke and Tautog are all under attack; future harvest are unknown with no stability insight. There's No chance to plan and grow your businesses under these conditions. Or enjoy fish for dinner if you're a recreational fisherman.

It would be easy tonight to become emotional and try to steal another modes or fisherman's slice of the pie. Commercial vs Recreational and vice versa. But I wont! Maybe these regulators intended to distract all fishermen and have them fight each other for fish. Maybe fishermen wont pay attention to MRIPs awful data being published, which makes over regulating easier for them to achieve.

Tonight I ask that no fisherman turns on each other but unite our fight to discredit MRIP, lower discards by decreasing harvestable length, and achieved better managed stocks.

Id like to share published preliminary 2019 CT mrip estimates:

Tautog- MRIP repots CT recreational anglers harvested 273,170 keepers in wave 6 which is only opened for the 28 days of November that's 9756 keepers everyday regardless of weather by just recreational fisherman with majority boats already hauled for winter.

Black Seabass- (PER MRIP) CT recreational anglers harvested 111,971 keepers in wave 6 November and December. I personally did catch 1 in November or December, Where in CT are these fish being harvested that time of year? again recreational boats are out of the water Veterans Day Nov.11 That's 1866 fish a day harvested by CT. recreational anglers. Does anyone believe CT harvested 495,701 in 2019? (2183 everyday) from May 19 to year end

Bluefish- Wave 3 (May/June) MPIR reports 121,712 from shore when snapper aren't even available yet? Where in CT. is this happening? (2028 per day from shore)

Fluke- Wave 5, fluke are only opened for 30 days of September shore anglers caught 5517 in that period MRIP Says.

Scup- Wave 3 (May/June) Shore harvested 494,619 divide by 60 days 8243 fish every day. Maybe I should sell my boat and start shore fishing.

The fish catch #s were difficult to believe when MRIP utilized a phone survey. Now MRIP reports 300% more fishing effort as data was better submitted by post card. Two weeks ago at the Striped Bass management meeting I polled 30 CT. fishermen in this room, not 1 ever received a post card requesting their fishing habits. In that same Striped bass meeting CT. DEEP terminated the bonus Striped Bass tag program, 4000 tags were handed out and only 100 postcards were returned from angler reporting their catch. In 2020 are postcards really the best we can do? For the last 4 years I have volunteered to participate in Electronic vessel trip reports written by SAFIS software, an IPAD tracts my time of effort, # of passengers and fish harvested. This is an actual fish count not a survey or a guess. Is this data applied to regulation making "NO!" Is it mandated in CT "NO!" Why isn't it used?

How can we continue make management decision based off of awful MRIP data? Bad data IN equals more dead discards, and interrupted breeding OUT! Seabass population is estimated 240% above threshold value, maybe strongest stock of my lifetime, did we get more fish A longer season? Instead Regulators called for a further 38% reduction of harvest, because their mathematical equation didn't work out. Stock was fine but MRIP reported to many people fishing for them.

I started my business in 2008 Bluefish, Striped Bass, Scup, Seabass and Tautog regulations stayed consistent year to year. The regulation you needed to watch changes for, was Fluke. Every year, the minimum keeper size grew an inch. We never knew if this new regulation helped the Stock, because it would further change the next year. Fast forward to 2020 we now know that it was this management tactics that caused low fluke stocks and anglers to pray on the large breeding females. That's years of of dead discards for only crabs to eat.

Three years ago, a few of us attended a Garfo workshop in Portsmouth NH. We were tasked with creating a perfect state of fishing regulations.

My perfect state:

- would immediately dis-credit and throw all of MRIP's data out. Freeze all regulations for 3 years. Immediately begin collecting new data from a localized electronic reporting source for recreational anglers. Mandate all

CT For Hire vessels to use EVTRs. Perform trawl surveys with proper matched doors to horsepower in known fish areas and times, not over empty bottom that fish intermittently only migrate through. This data should be processed and published by our fishery managers and over seen by fishermen, not sent to a third party.

- When public hearing are held, show the meeting complete data don't leave the last three years of data off the slide (like we recently experienced in the Striped Bass meeting only going up to 2016) Lets see what 3 years of 1 @28" did for the stock.
- Passed regulations shouldn't expire for 3 years, so we can clearly see the impact it created. Have a strict cutoff date, all new regulations must be passed before February 1st any later they aren't enacted till the following year.
- For Hire has proven it makes up less than 10% of the harvest and provides access to people of all income levels and demographics, we need to create a sector for for-hire of their own this will achieve stability and maintain a resource for all fishermen without boats to enjoy.

I have brought copies to hand out supporting everything thing I have spoken of.

Thank You for your time

Michael Pirri

Michael Pirri
2-26-2020

NOAA FISHERIES SERVICE

Scup

Your Query Parameters:

Query:	MRIP CATCH TIME SERIES
Year:	2019 - 2019
Wave:	BY WAVE
Species:	SCUP
Geographic Area:	CONNECTICUT
Fishing Mode:	ALL MODES BY MODE
Fishing Area:	ALL AREAS COMBINED
Type of Catch:	HARVEST (TYPE A + B1)
Information:	NUMBERS OF FISH

**Review the glossary for a description of how the for-hire survey methods have changed over time.

** Results from this query for 1981-2017 now contain estimates resulting from the full application of both the Access Point Angler Intercept Survey (APAIS) and Fishing Effort Survey (FES) calibration.
** Beginning in 2018 wave 1, all catch estimates in shore and private/rental boat modes are calculated using effort based on the FES.

Return to Query Page

Estimate Status	Year	Wave	Common Name	Fishing Mode	Total Harvest (A+B1)	PSE
PRELIMINARY	2019	MAY/JUNE	SCUP	SHORE	404,619	93.7
PRELIMINARY	2019	MAY/JUNE	SCUP	PARTY BOAT	77,972	25.8
PRELIMINARY	2019	MAY/JUNE	SCUP	CHARTER BOAT	3,830	65.5
PRELIMINARY	2019	MAY/JUNE	SCUP	PRIVATE/RENTAL BOAT	16,972	58.6
PRELIMINARY	2019	JULY/AUGUST	SCUP	SHORE	380,304	85.2
PRELIMINARY	2019	JULY/AUGUST	SCUP	PARTY BOAT	199,370	20.1
PRELIMINARY	2019	JULY/AUGUST	SCUP	CHARTER BOAT	14,969	46.2
PRELIMINARY	2019	JULY/AUGUST	SCUP	PRIVATE/RENTAL BOAT	423,927	21.5
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SCUP	SHORE	496,532	55.9
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SCUP	PARTY BOAT	78,446	36.4
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SCUP	CHARTER BOAT	7,005	60.6
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SCUP	PRIVATE/RENTAL BOAT	380,391	36.9
PRELIMINARY	2019	NOVEMBER/DECEMBER	SCUP	PARTY BOAT	439	11.9
PRELIMINARY	2019	NOVEMBER/DECEMBER	SCUP	PRIVATE/RENTAL BOAT	0	.

PSE

Shore 1,281,456 47.6
Party Boat 356,226 14.9
Charter 26,803 32.9
Rec 840,290 20.7

= 2,503,776 Total

Annual PSE 25.4

PSE, or proportional standard error, is automatically included in all outputs.
It expresses the standard error of an estimate as a percentage of the estimate and is a measure of precision.
A PSE value greater than 50 indicates a very imprecise estimate.

Data Sources by Geographic Area:
MRIP: ME-LA (LA through 2013), PR, HI, WA/OR/CA (through 2004)

If you want to cite a reference for data retrieved from our website, use: Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division February 25, 2020 .

Return to Query Page

NOAA FISHERIES SERVICE

Tautog

Your Query Parameters:

Query:	MRIP CATCH TIME SERIES
Year:	2019 - 2019
Wave:	BY WAVE
Species:	TAUTOG
Geographic Area:	CONNECTICUT
Fishing Mode:	ALL MODES BY MODE
Fishing Area:	ALL AREAS COMBINED
Type of Catch:	HARVEST (TYPE A + B1)
Information:	NUMBERS OF FISH

**Review the glossary for a description of how the for-hire survey methods have changed over time.

** Results from this query for 1981-2017 now contain estimates resulting from the full application of both the Access Point Angler Intercept Survey (APAIS) and Fishing Effort Survey (FES) calibration.
** Beginning in 2018 wave 1, all catch estimates in shore and private/rental boat modes are calculated using effort based on the FES.

(Day after) (21) (28)

Return to Query Page

Estimate Status	Year	Wave	Common Name	Fishing Mode	Total Harvest (A+B1)	PSE
PRELIMINARY	2019	MAY/JUNE	TAUTOG	SHORE	617	104.3
PRELIMINARY	2019	MAY/JUNE	TAUTOG	PRIVATE/RENTAL BOAT	0	
PRELIMINARY	2019	JULY/AUGUST	TAUTOG	SHORE	0	
PRELIMINARY	2019	JULY/AUGUST	TAUTOG	PRIVATE/RENTAL BOAT	2,306	74.5
PRELIMINARY	2019	SEPTEMBER/OCTOBER	TAUTOG	SHORE	0	
PRELIMINARY	2019	SEPTEMBER/OCTOBER	TAUTOG	PARTY BOAT	1,063	79.2
PRELIMINARY	2019	SEPTEMBER/OCTOBER	TAUTOG	CHARTER BOAT	2,509	63.4
PRELIMINARY	2019	SEPTEMBER/OCTOBER	TAUTOG	PRIVATE/RENTAL BOAT	165,658	37.6
PRELIMINARY	2019	NOVEMBER/DECEMBER	TAUTOG	PARTY BOAT	1,467	49.3
PRELIMINARY	2019	NOVEMBER/DECEMBER	TAUTOG	PRIVATE/RENTAL BOAT	273,170	38.6

PSE | Wave 5 | Wave 6
Shore | 0 | —
Party | 1063 | 1467
Charter | 2509 | —
Rec | 165,658 | 273,170 (7883)(97
CT = 446 1691 Total

Annual PSE 26.4

Fish Per Da

PSE, or proportional standard error, is automatically included in all outputs.
It expresses the standard error of an estimate as a percentage of the estimate and is a measure of precision.
A PSE value greater than 50 indicates a very imprecise estimate.

Data Sources by Geographic Area:
MRIP: ME-LA (LA through 2013), PR, HI, WA/OR/CA (through 2004)

If you want to cite a reference for data retrieved from our website, use: Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division February 25, 2020 .

Return to Query Page

NOAA FISHERIES SERVICE

B Sea bass

Your Query Parameters:

Query:	MRIP CATCH TIME SERIES
Year:	2019 - 2019
Wave:	BY WAVE
Species:	BLACK SEA BASS
Geographic Area:	CONNECTICUT
Fishing Mode:	ALL MODES BY MODE
Fishing Area:	ALL AREAS COMBINED
Type of Catch:	HARVEST (TYPE A + B1)
Information:	NUMBERS OF FISH

**Review the glossary for a description of how the for-hire survey methods have changed over time.

** Results from this query for 1981-2017 now contain estimates resulting from the full application of both the Access Point Angler Intercept Survey (APAIS) and Fishing Effort Survey (FES) calibration.
** Beginning in 2018 wave 1, all catch estimates in shore and private/rental boat modes are calculated using effort based on the FES.

Return to Query Page

Estimate Status	Year	Wave	Common Name	Fishing Mode	Total Harvest (A+B1)	PSE
PRELIMINARY	2019	MAY/JUNE	BLACK SEA BASS	PARTY BOAT	6,102	72.4
PRELIMINARY	2019	MAY/JUNE	BLACK SEA BASS	CHARTER BOAT	1,304	52
PRELIMINARY	2019	MAY/JUNE	BLACK SEA BASS	PRIVATE/RENTAL BOAT	52,380	51.6
PRELIMINARY	2019	JULY/AUGUST	BLACK SEA BASS	SHORE	0	.
PRELIMINARY	2019	JULY/AUGUST	BLACK SEA BASS	PARTY BOAT	38,352	17.9
PRELIMINARY	2019	JULY/AUGUST	BLACK SEA BASS	CHARTER BOAT	4,095	22.6
PRELIMINARY	2019	JULY/AUGUST	BLACK SEA BASS	PRIVATE/RENTAL BOAT	179,594	21.7
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLACK SEA BASS	SHORE	0	.
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLACK SEA BASS	PARTY BOAT	5,984	49.8
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLACK SEA BASS	CHARTER BOAT	4,145	46.2
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLACK SEA BASS	PRIVATE/RENTAL BOAT	88,571	28.7
PRELIMINARY	2019	NOVEMBER/DECEMBER	BLACK SEA BASS	PARTY BOAT	225	18.7
PRELIMINARY	2019	NOVEMBER/DECEMBER	BLACK SEA BASS	PRIVATE/RENTAL BOAT	111,971	58.1

Shore 0 0
Party 52,642 18
Charter 9544 23.4
Rec 433,515 19.1
CT = 495,701 Total

Not possible

Annual PSE 16.8

PSE, or proportional standard error, is automatically included in all outputs.
It expresses the standard error of an estimate as a percentage of the estimate and is a measure of precision.
A PSE value greater than 50 indicates a very imprecise estimate.

Data Sources by Geographic Area:
MRIP: ME-LA (LA through 2013), PR, HI, WA/OR/CA (through 2004)

If you want to cite a reference for data retrieved from our website, use: Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division February 25, 2020 .

Return to Query Page

NOAA FISHERIES SERVICE

Bluefish

Your Query Parameters:

Query:	MRIP CATCH TIME SERIES
Year:	2019 - 2019
Wave:	BY WAVE
Species:	BLUEFISH
Geographic Area:	CONNECTICUT
Fishing Mode:	ALL MODES BY MODE
Fishing Area:	ALL AREAS COMBINED
Type of Catch:	HARVEST (TYPE A + B1)
Information:	NUMBERS OF FISH

**Review the glossary for a description of how the for-hire survey methods have changed over time.

** Results from this query for 1981-2017 now contain estimates resulting from the full application of both the Access Point Angler Intercept Survey (APAIS) and Fishing Effort Survey (FES) calibration.
** Beginning in 2018 wave 1, all catch estimates in shore and private/rental boat modes are calculated using effort based on the FES.

Return to Query Page

Estimate Status	Year	Wave	Common Name	Fishing Mode	Total Harvest (A+B1)	PSE
PRELIMINARY	2019	MAY/JUNE	BLUEFISH	SHORE	121,712	67.9
PRELIMINARY	2019	MAY/JUNE	BLUEFISH	PARTY BOAT	567	52
PRELIMINARY	2019	MAY/JUNE	BLUEFISH	CHARTER BOAT	159	61.3
PRELIMINARY	2019	MAY/JUNE	BLUEFISH	PRIVATE/RENTAL BOAT	4,117	67.1
PRELIMINARY	2019	JULY/AUGUST	BLUEFISH	SHORE	11,157	107.7
PRELIMINARY	2019	JULY/AUGUST	BLUEFISH	PARTY BOAT	517	45.3
PRELIMINARY	2019	JULY/AUGUST	BLUEFISH	CHARTER BOAT	603	63.6
PRELIMINARY	2019	JULY/AUGUST	BLUEFISH	PRIVATE/RENTAL BOAT	74,335	38.9
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLUEFISH	SHORE	356,595	78.3
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLUEFISH	PARTY BOAT	336	74.9
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLUEFISH	CHARTER BOAT	6,670	56
PRELIMINARY	2019	SEPTEMBER/OCTOBER	BLUEFISH	PRIVATE/RENTAL BOAT	93,743	34.5

PSE

Shore 489,463 61.1
Party 1420 31.9
Charter 7432 52.3
Rec 172,195 25.2
CT = 670,511 Total

45.1 PSE
Near very imprecise estimate

PSE, or proportional standard error, is automatically included in all outputs.
It expresses the standard error of an estimate as a percentage of the estimate and is a measure of precision.
A PSE value greater than 50 indicates a very imprecise estimate.

Data Sources by Geographic Area:
MRIP: ME-LA (LA through 2013), PR, HI, WA/OR/CA (through 2004)

If you want to cite a reference for data retrieved from our website, use: Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division February 25, 2020 .

Return to Query Page

NOAA FISHERIES SERVICE

Striped Bass

Your Query Parameters:

Query:	MRIP CATCH TIME SERIES
Year:	2019 - 2019
Wave:	BY WAVE
Species:	STRIPED BASS
Geographic Area:	CONNECTICUT
Fishing Mode:	ALL MODES BY MODE
Fishing Area:	ALL AREAS COMBINED
Type of Catch:	HARVEST (TYPE A + B1)
Information:	NUMBERS OF FISH

**Review the glossary for a description of how the for-hire survey methods have changed over time.

** Results from this query for 1981-2017 now contain estimates resulting from the full application of both the Access Point Angler Intercept Survey (APAIS) and Fishing Effort Survey (FES) calibration.
** Beginning in 2018 wave 1, all catch estimates in shore and private/rental boat modes are calculated using effort based on the FES.

Return to Query Page

Estimate Status	Year	Wave	Common Name	Fishing Mode	Total Harvest (A+B1)	PSE
PRELIMINARY	2019	MARCH/APRIL	STRIPED BASS	SHORE	527	106
PRELIMINARY	2019	MARCH/APRIL	STRIPED BASS	PRIVATE/RENTAL BOAT	783	67
PRELIMINARY	2019	MAY/JUNE	STRIPED BASS	SHORE	3,379	100.8
PRELIMINARY	2019	MAY/JUNE	STRIPED BASS	PARTY BOAT	2	112
PRELIMINARY	2019	MAY/JUNE	STRIPED BASS	CHARTER BOAT	608	41.5
PRELIMINARY	2019	MAY/JUNE	STRIPED BASS	PRIVATE/RENTAL BOAT	34,391	40.6
PRELIMINARY	2019	JULY/AUGUST	STRIPED BASS	SHORE	0	.
PRELIMINARY	2019	JULY/AUGUST	STRIPED BASS	PARTY BOAT	7	105.2
PRELIMINARY	2019	JULY/AUGUST	STRIPED BASS	CHARTER BOAT	1,394	52.3
PRELIMINARY	2019	JULY/AUGUST	STRIPED BASS	PRIVATE/RENTAL BOAT	6,426	37
PRELIMINARY	2019	SEPTEMBER/OCTOBER	STRIPED BASS	SHORE	0	.
PRELIMINARY	2019	SEPTEMBER/OCTOBER	STRIPED BASS	PARTY BOAT	0	.
PRELIMINARY	2019	SEPTEMBER/OCTOBER	STRIPED BASS	CHARTER BOAT	1,553	69.3
PRELIMINARY	2019	SEPTEMBER/OCTOBER	STRIPED BASS	PRIVATE/RENTAL BOAT	2,787	51.9
PRELIMINARY	2019	NOVEMBER/DECEMBER	STRIPED BASS	PRIVATE/RENTAL BOAT	12,822	94.1

Shore 3906
Party 9
Charter 5,556
Pvt 57,209
CT= 64,680 Total

PSE
88.3
89.3
37.3
32.6

Annual PSE
29.4

Not Possi

PSE, or proportional standard error, is automatically included in all outputs.
It expresses the standard error of an estimate as a percentage of the estimate and is a measure of precision.
A PSE value greater than 50 indicates a very imprecise estimate.

Data Sources by Geographic Area:
MRIP: ME-LA (LA through 2013), PR, HI, WA/OR/CA (through 2004)

If you want to cite a reference for data retrieved from our website, use: Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division February 25, 2020 .

Return to Query Page

NOAA FISHERIES SERVICE

Fluke

Your Query Parameters:

Query:	MRIP CATCH TIME SERIES
Year:	2019 - 2019
Wave:	BY WAVE
Species:	SUMMER FLOUNDER
Geographic Area:	CONNECTICUT
Fishing Mode:	ALL MODES BY MODE
Fishing Area:	ALL AREAS COMBINED
Type of Catch:	HARVEST (TYPE A + B1)
Information:	NUMBERS OF FISH

**Review the glossary for a description of how the for-hire survey methods have changed over time.

** Results from this query for 1981-2017 now contain estimates resulting from the full application of both the Access Point Angler Intercept Survey (APAIS) and Fishing Effort Survey (FES) calibration.

** Beginning in 2018 wave 1, all catch estimates in shore and private/rental boat modes are calculated using effort based on the FES.

Return to Query Page

Estimate Status	Year	Wave	Common Name	Fishing Mode	Total Harvest (A+B1)	PSE
PRELIMINARY	2019	MAY/JUNE	SUMMER FLOUNDER	SHORE	0	-
PRELIMINARY	2019	MAY/JUNE	SUMMER FLOUNDER	PARTY BOAT	3	112.8
PRELIMINARY	2019	MAY/JUNE	SUMMER FLOUNDER	CHARTER BOAT	80	99
PRELIMINARY	2019	MAY/JUNE	SUMMER FLOUNDER	PRIVATE/RENTAL BOAT	25,073	51.4
PRELIMINARY	2019	JULY/AUGUST	SUMMER FLOUNDER	SHORE	1,162	111.4
PRELIMINARY	2019	JULY/AUGUST	SUMMER FLOUNDER	PARTY BOAT	502	87.6
PRELIMINARY	2019	JULY/AUGUST	SUMMER FLOUNDER	CHARTER BOAT	121	82.6
PRELIMINARY	2019	JULY/AUGUST	SUMMER FLOUNDER	PRIVATE/RENTAL BOAT	58,333	25.5
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SUMMER FLOUNDER	SHORE	5,617	109
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SUMMER FLOUNDER	PARTY BOAT	0	-
PRELIMINARY	2019	SEPTEMBER/OCTOBER	SUMMER FLOUNDER	PRIVATE/RENTAL BOAT	1,111	72.3

PSE

Shore 6,679 92.1
Party 505 87.1
Charter 201 63.4
Rec 82,516 23.4

CT= 89,902 Total

Annual PSE 22.5%

PSE, or proportional standard error, is automatically included in all outputs.
It expresses the standard error of an estimate as a percentage of the estimate and is a measure of precision.
A PSE value greater than 50 indicates a very imprecise estimate.

Data Sources by Geographic Area:
MRIP: ME-LA (LA through 2013), PR, HI, WA/OR/CA (through 2004)

If you want to cite a reference for data retrieved from our website, use: Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division February 25, 2020 .

Return to Query Page

From: Squarespace <no-reply@squarespace.info>
Date: January 29, 2020 at 8:37:38 PM EST
To: Mary Clark Sabo <msabo@mafmc.org>
Subject: Form Submission - Contact Info - Bluefish scoping
Reply-To: mimi217@sbcglobal.net

Name: Michelle Defeo

Email Address: mimi217@sbcglobal.net

Subject: Bluefish scoping

Message: I think the first thing you should do to save the bluefish is stop all public and private bluefish contests in the tri-state area ! Also eliminate all snapper fishing for 2 years ! Limit the size for of fish that reproduce ! My opinion

(Sent via *Mid-Atlantic Fishery Management Council*)

From: mikekenville@aol.com
Sent: Wednesday, February 19, 2020 10:45 AM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments

Thank you for taking the time to read my comments concerning Bluefish:

I'm a 56 year old sportsman from New Jersey who has fished for Bluefish his entire life. I appreciate the fact that fishery managers are taking a look at Bluefish conservation, considering that we are in a down cycle of Bluefish abundance in the Garden State.

The proposed bag limit I've read thou, (3 for private anglers, 5 for hire) appear to be overly draconian and I don't feel will have any significant positive effect. This is because Bluefish are a pelagic species that roam most of our oceans and here in the US are not heavily harvested either commercially or recreationally. They certainly are targeted a lot by sportsman, but many more are released then kept now in my recent experience over the last 20 years in New Jersey - gone are the days of filling a burlap sack on a party boat.

So you may wonder if I release most of my Bluefish why do I feel a bag limit of 3 is a hardship? The reason is that there are times when I enjoy harvesting the smaller Bluefish of 12 to 16 inches and a bag limit of 3 would make this pointless. Five for both private and boat anglers would make more sense and I don't think the net effect would be harmful to the overall population.

There is another reason too, late in the summer and early fall the 12 to 16 inch Bluefish provide one of the few consistent opportunities for the shore based angler who wants to harvest fresh seafood. With the current size limits you could fish your entire life from a beach or pier and never catch a keeper Sea Bass or Fluke, so what else is there beside Bluefish?

Please consider NOT reducing the bag limit to 3.

Sincerely,
Mike Kenville
147 Pebblebrook Lane
Mt. Laurel, NJ

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, February 11, 2020 7:39 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: mike Rapoza

Email: rapdiver@comcast.net

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: Massachusetts, Rhode Island

Gear type(s) used:: Hook and line or handline

Comments: Sadly bluefish is going the way of other game fish in the northeast. Over fishing by commercial fisherman and
catch limits for recreational fisherman that are ridiculously high are bringing the bluefish population down to historic lows.Our liberal fishery management of this species is an insult to shore and small boat fisherman of New England.
When will our fisheries management have the backbone to set sustainable limits on bluefish?
Every other game fish is our region is near historic lows and will soon be nothing more than a memory.

Respectfully,
Michael Rapoza

(Sent via *Mid-Atlantic Fishery Management Council*)

NEW YORK RECREATIONAL & FOR-HIRE FISHING ALLIANCE
"LET US FISH"

March 17, 2020

Dr. Christopher Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE 19901

RE: **Written comment *Fluke/Scup/Sea Bass/Bluefish Allocation and Bluefish Rebuilding Amendment***

Submitted via email.

Dear Dr. Moore,

I am writing on behalf of the New York Recreational & For-Hire Fishing Alliance (NY RFHFA) which is the largest advocacy organization for the for-hire fleet and the interests of anglers who fishes upon party and charter boats in the NYS Marine & Coastal District as it concerns the Summer Flounder, Scup, and Black Sea Bass and Bluefish Commercial/ Recreational Allocation and Bluefish Rebuilding Amendment.

The board of the NY RFHFA reconquer with the previous oral public comments made by Regulatory & Science Research Director Steven Cannizzo at both the Belmar, New Jersey and Stony Brook, New York scoping hearings on the priorities that both the MAFMC and ASMFC should immediately address in 2020 and in improve upon in the years thereafter.

During these hearings we heard at times extremely passionate public input from a diverse audience of attendees made up of commercial and for-hire owners, operators, crew members as well as the general fishing angler, and there was an extremely unified theme voiced by almost all speakers on the following "issues for consideration" which we agree and again will provide written comment upon.

This is a brief and broad summary of the five areas in which the council and commission should prioritize their future regulatory work in addressing.

1- NO ACTION/STATUS QUO

At this time with the unending unstable regulatory environment of the species of concern on this issue of summer flounder (fluke), scup, black sea bass (bsb) and bluefish, the majority of audience members agreed that the 're-balancing' of the historical percentage in the allocations between the commercial and recreational sector was not addressing the major concern of improving recreational catch estimate data, nor would it provide any substantial liberalization to the recreational regulatory controls which recreational fishermen must adhere to. These include in the lessening of the minimum size, increasing possession limits where appropriate for a particular species, increasing open days during a season or lessening regulatory discards as these fisheries have morphed into de facto catch & release exercises on a for-hire vessel with little of any fish to harvest of the overall daily catch.

As troubling was the approach the council has put forward of which the power point presentation and relevant scoping document did not address in clarifying the exact cause for changing the percentage of allocation from the original FMPs which were based upon landings data from the 1980 to early 1990 time period.

Fishery data from both the commercial and recreational sector during this period has a wide range of variability in the available data as far standardized or inaccurate reporting and low levels of compliance by both sectors during those years. Without a complex and thorough review of raw fishery catch, discard and harvest data, it begs the question on the appropriateness to base current management on both the data and statistics from that period in the history of these fisheries, and the final decision made in changing allocations in the FMPs to either sector.

For these reasons we support NO ACTION/STATUS QUO

2- SEPARATION OF FOR-HIRE MODES FROM PRIVATE VESSEL AND SHORE BOUND MODES

It was clearly evident by those stakeholders from the for-hire sector that the council should move forward in recognizing that the for-hire sector has mandatory paper VTR and eVTR reporting which increases fishery dependent data in the accuracy of catch and harvest which is a more precise indicator on increased or lower biomass levels of abundance of these species.

The for-hire industry is not requesting a specifically allocated sub-ACL for party and charter boats, but believes in the further use of a 'sector allowance' which is currently used by the MAFMC in the management of scup, blueline tilefish and in 2020 for bluefish. The reason is obvious for creating sector allowances for these species as it is directly linked to historical recreational reported MRIP estimates and the most catch and harvest estimates. As seen for these four species of concern:

FLUKE (2014-2018) PRIV. VESS: 85%, SHORE: 9%, FOR-HIRE: 6%

SCUP (2016-2018) PRIV. VESS: 56%, SHORE: 34% FOR-HIRE: 10%

BSB (2016-2018) PRIV. VESS: 88%, SHORE: 2% F0R-HIRE: 10%

==========

BLUEFISH – USING REC. MEASURES for DEC.10.19 PRESENTATION ON STAFF REC.

(2016-2018) Coast wide Landings (harvest):

PRIV.VESS. & SHORE: 96.4%

FOR-HIRE: 3.6% with PARTY BOATS UNDER >1% OF HARVEST

Due to the 2 to 5 times increase in the magnitude of catch and harvest as a result of the new MRIP re-calibration, the for-hire industry has extremely low levels in the percentage of harvest which has not resulted in exceeding harvest limits for the party and charter modes, as well as in operating accordingly in not threatening the sustainability nor imperil any stock in need of, or undergoing rebuilding.

For these reasons we support For-Hire 'sector allowances'

3- INCREASING RECREATIONAL ACCOUNTABILITY AND DATA ESTIMATE ACCURACY

Though Kiley, Karson and Matt from the council presented and led the scoping discussion to the audience and tried as best to shy away from – "in best teasing out" the information on the "issues for consideration," MRIP has been deemed the "root of all regulatory evil" and is apparent with the comments made at the meetings and for the last few years as the most primary issue for-hire industry economic viability and the frustration of recreational fishing public in angler satisfaction.

Recreational accountability should result in mandatory reporting by private vessels and shore bound anglers with at a minimum to report that they have engaged in a fishing activity to increase the accuracy of MRIP effort estimates. This can be vastly improved through a pilot program which can be designed in a similar fashion to that of the FACTS reporting system in Maryland where an angler 'Hails-Out' by dialing from either a hardline, smartphone or on his computer to log in, then receive a verification number which he uses if stopped by marine enforcement, and eventually 'Hails-In' to the same number after his trip and then enters the number of participants for effort along with catch/harvest info for species such as fluke, bsb, bluefish or striped bass and tautog.

A properly set up voice call in system with a brief question and then a response from the angler would greatly help in increasing angler cooperation and data accuracy directly from the angler, and most of all in design to be as least intrusive and time consuming in that it should take roughly one minute to complete.

As to the MRIP program and the new changes which obviously have now made the resulting recreational estimates shift from previously being implausible to now becoming impossible to believe with the new estimates. We had also heard from the SSC Q&A MRIP webinar the prior week where it was made clear that the current new MRIP was a painstaking process to undergo in re-calibrating estimates, and one should not expect any distinct changes that can be recommended by stakeholders or the fishing public other than to move forward with direct private vessel and shore bound angler mandatory reporting.

For these reason we support mandatory private vessel and shore bound modes reporting.

4- CATCH LIMITS DEFINED IN POUNDS AND/OR NUMBERS OF FISH

One point which was brought up at the Belmar, NJ scoping meeting by long time ASMFC NJ Commissioner Tom Foote and Captain Neil Delanoy of the Laura Lee fleet at the Stony Brook, NY meeting in that the "currency of recreational fisheries" is in the counting of the numbers of fish caught, harvested and discarded, and that the resulting conversion to pounds as allocations are based in pounds and the multiplier used on the average size of fish is not only inaccurate in MRIP estimates but penalizes fishermen for catching larger fish.

As Commissioner Tom Foote noted that the 1980s represented a decade where average fish sizes were notably different in being smaller for fluke, scup and bsb in contrast to the last full decade period when these stocks were rebuilt and had a much larger number of older fish during the 2010-2019 time period, and was later echoed by Captain Delanoy at the following NY meeting that an approach should be made in transitioning back to fish counts in regulating harvest limits for the recreational sector. This corresponds with the sentiment of stakeholders involved in Advisory Panel discussion over the years with this statement,

"No matter the fishing mode in which a fish is harvested, a harvested fish is just that in being 'one harvested fish,' no matter the weight."

The council should examine in coordination with the SSC and MC in starting a process where recreational fisheries can have catch limits based upon counting fish in a particular time frame from when the FMPs were approved.

For this reason we support moving Catch Limits to be defined in numbers of fish

5- MANAGEMENT FLEXIBILITY IN TRANSFER OF ALLOCATIONS

One of the lessor noted topics of discussion was in allowing management at the MC level and the council to have the flexibility in transferring allocations where they are needed for both the commercial and recreational sector. This would be a regulatory tool which can be adopted through the development of a framework to be applied for stocks that are not in the process of rebuilding or in the early stages before a rebuilding program has been implemented.

There is a growing belief that once the ABC is set during specifications by the SSC, that a flexible ACL for both the sectors can be used with caps or upper limit boundaries along with triggers for shifting either a percentage of, or pre-determined amount of poundage to be made available in order to prevent that sector in exceeding their harvest limit.

From the audience consensus, and among the board members of the NY RFHFA, approving management flexibility in transferring allocation between sectors would be seen as positive outcome from the scoping process in preventing fisheries to be shut down or poundage penalties accessed in the following calendar year.

For this reason we support the use of Management Flexibility in allocation transfers

The NY RFHFA appreciates the opportunity to provide input in public comments, in improving the management of fluke, scup, sea bass and bluefish in the Northeast region. The NY RFHFA will continue to participate in this process moving forward, and will advocate as much during MC, AP, council, commission and state meetings.

These written comments align to what was stated at the public hearings, and we again like to thank you for carefully considering these comments from not only the NY RFHFA, but also we believe represent the sentiments of fishermen from both the commercial and recreational fishing sectors in the New York Marine & Coastal District.

Sincerely,

Steven Cannizzo, NY RFHFA

New York Recreational & For-Hire Fishing Alliance

mb1143f@gmail.com

NEW YORK RECREATIONAL & FOR-HIRE ALLIANCE:

Executive Director Captain Joe Tangel, fv KING COD

Board Member Captain Carl Forsberg, Viking Fishing Fleet

Board Member Captain Jimmy Schneider, James Joseph Fishing Fleet

Board Member Captain Kenny Higgins, Captree Pride & Captree Princess

Board Member Captain Anthony Testa Sr., f/v Stefani Ann

Board Member Captain Anthony Testa Jr., f/v Stefani Ann

Concurred by:

NYS Recreational MRAC Advisor, MAFMC AP Advisor & NYS FFL permit holder

Captain Steve Witthuhn, f/v TOP HOOK

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, February 11, 2020 4:17 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Orlando Panico

Email: opanico1@comcast.net

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: Is the goal of these hearings to destroy recreational fishing? Bluefish are perhaps the most abundant fish in the Delaware Bay. Putting a limit on them not only hurts the recreational fishermen but also may put in danger the bunker population. Bluefish feed on bunker. The more blues the less bunker. The less bunker the less striped bass. The less stiped bass the more stupid the laws passed to save them. The flounder laws and limits are probably the most ridiculous laws on the book. The larger fish over 18" are more than likely to be females which are allowed to be kept. DUH. How about keeping 17" fish and letting the larger ones return back to lay eggs! WAKE UP! Why is it that environmentalists continually play games with the recreational fishermen? STOP trying to be Mother Nature and help with keeping the bays and oceans clean. This would make an impact instead of laws and limits few obey .

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 11:58 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: patrick duckworth

Email: patrick_duckworth@yahoo.com

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Gillnet

Comments: The commercial quota needs to be increased to 50%. Min bluefish size should be 18 inches. Northern states need more bluefish quota from southern states

(Sent via *Mid-Atlantic Fishery Management Council*)

From: drpat33 <drpat33@aol.com>
Sent: Tuesday, March 17, 2020 10:49 PM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments

As a veterinarian and avid fisherman I would suggest a 3 year moratorium on snapper fishing along the entire east coast .The problems is that to many juveniles are caught and never get a chance to reproduce.
Dr. Patrick Lanzarone 9179919683

Sent from my Verizon, Samsung Galaxy smartphone

From: hoppyale <hoppyale@sbcglobal.net>
Sent: Sunday, March 1, 2020 10:23 AM
To: Seeley, Matthew
Subject: Bluefish scoping comments

Chris as a recreational fisherman I appreciate your work. To me, besides the skewed numbers everybody has a problem with there is 2 major problems with compiled data and management plan. First I believe the biggest problem is the seemingly arbitrary target goal of 200,000 MT that has never been reached, even back in th 80s when people were filling garbage cans with blues. That just doesn't happen any more even when "the race" is red hot. Habits have changed. Also fish have moved. Speaking from my vantage point of the eastern sound, the race, where much of the fishing occurs, the big schools of large fish are not centered here any longer. I believe the target number of 200,000 needs to change rather drastically. Thanks, Paul Whitehouse. Niantic, ct

From: KESS <pkess@optonline.net>
Sent: Tuesday, March 17, 2020 4:01 PM
To: Seeley, Matthew
Subject: BLUE FISH ALLOCATION

Captain Philip A. Kess
FISHY BUSINESS Sportfishing Charters
P.O. Box 129 Aquebogue , N.Y. 11931
Pkess@optonline.net
516-316-6967

Bluefish Allocation and Rebuilding Amendment 3/17/2020

To whom it may concern,

I'm the owner operator of the charter boat FISHY BUSINESS sailing out of Orient Point L.I. New York for the past 25 years .
Below are my main points of concern at this time.

1. I believe we should stay status quo until we can get more reliable data
especially in the recreational sector. MRIP numbers have been shown to be unreliable .

2. Explore having a separate allocations for the for hire fleet . With the data obtained from our VTRS, the for hire fleet has been shown to have minimal effect on our fisheries .

3. Much more study and action on the effects of Pollution and Predation on the juvenile and breeding stock . With the explosion of Seal and Cormorant populations as well as the Sea Bass , which are eating tens of thousands of fish daily.

Thank you for your consideration

Captain Philip A. Kess

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, February 11, 2020 5:45 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Phillip LaStella

Email: panfilio@acedsl.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: Please implement significant reduction in bluefish quotas especially for boat and commercial/recreational fisherman.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, February 26, 2020 9:36 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Ralph Chappell

Email: captrechappell@yahoo.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: North Carolina

Gear type(s) used:: Hook and line or handline

Comments: The abrupt change to a three fish limit while allowing a five fish limit if the same angler is fishing with a guide demonstrates the abject lack of science behind the decision.

Compound that with the there being no size or slot limits also challenges the credibility of the decision

Finally, try to find any mention anywhere for Commercial Limits....and see if you can determine what it might be.

When discussing this issue with a NOAA employee.....the reaction was both hands in the air and the statement that there is no telling what the State of North Carolina does!

That coming from a very credible and reasonable proponent for controlled limits on fishing stocks.

Stick with the old Limits... and apologize for getting it exactly wrong is my suggestion.

Note.....I hold both Recreational and Commercial Licenses in North Carolina.

I can see both sides of the issue....although I seriously doubt the State of North Carolina can based upon the last Bluefish Decision.

I can be convinced....but there was absolutely no effort to do that by the State of North Carolina PRIOR to announcing the decision.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Randy Sigler <randy@striper.com>
Sent: Tuesday, January 14, 2020 12:10 PM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments ...

Hey Matt,

Randy Sigler here, from Marblehead, MA. Thanks for accepting thoughts about the bluefish fishery :)

I am a commercial fisherman, and a licensed seafood dealer in the Boston area. However, the largest component of my business is Sigler Guide Service, a charter operation primarily fishing nearshore for striped bass and bluefish. I have eight guides, running 24' - 26' center consoles, with the majority of our trips being half day, inshore trips with 1 - 4 anglers per boat.

As some reference, we ran over 800 trips this past summer which, I believe, would make us the largest charter operator in the north east. We are highly conservation/ catch & release oriented, and have had a self-imposed "slot limit" on striped bass for many years ... releasing any fish over 36". For our business, having fish available to catch is far more important than having fish to bring home.

My charter business generates a significant economic impact when considering charter fees, gratuities, lodging/dinging/etc from visiting anglers, as well as fuel, ice, dockage, tackle, etc, etc for eight boats and guides.

In terms of bluefish, we have grown increasingly concerned over the last five to eight years at the decline in abundance that we have seen in our area. I am nor familiar enough w/current stock assessments and trends, nor am I intimately familiar with historical allocations. What I can say is that our business suffers when abundance drops, and it thrives when stocks are at high abundance levels.

If the overall stock is managed to create high abundance, I am less concerned with commercial vs recreational allocations. A two or three fish bag limit is more than sufficient for our business to thrive. My concern with allocation becomes more relevant if the allocations chosen lead to difficulty rebuilding stock levels.

I'm not sure if that helps, but wanted to share some perspective from what I think is a significant economic player in the bluefish fishery north of Boston.

Thanks again Matt. Please feel free to reach out w/any questions or thoughts.

Sincerely,

Randy

Randy Sigler
Sigler Guide Service
1 Peabody Ln
Marblehead, MA 01945
www.Striper.com
randy@striper.com
617-459-1798

From: rich beneduci <rlb6233@gmail.com>
Sent: Tuesday, March 17, 2020 4:08 PM
To: Seeley, Matthew
Subject: Blue fish limits

I have been fishing in NJ now for over 40years. I understand the need to put limits on keeping fish. What I do not understand is why limits on party boats are higher than private boats.
As an owner and fisherman on my boat, I spend and support the NJ economy as do party boat owners.
I buy bait, tackle, gas and other other items. All fisherman are equal, therefore limits should be equal. (Be it 3,4,or5) .
The board should also consider putting size limits on blue fish. Small fish do not yield enough meat for food and will grow to enhance the stock.
I understand the argument that snappers are used for bait, but there other baits that can used.

With all restrictions on flounder, weak fish (which I do not even target anymore), fluke and stripe bass, it becomes less and less appealing to continue fishing.
I truly believe that limits on bluefish are required but all fisherman should adhere to the SAME restrictions. People on party boats tend to be wasteful. They tend to feel they need to get their monies worth. Owners must instruct participants the need for conserving our resourses.

Please consider giving all fisherman the same limits. Why be different? All other fish limits are the same for all fisherman. What is different about bluefish?

Rich Beneduci

From: ROBERT SWITZER <robert_switzer@msn.com>
Sent: Wednesday, March 18, 2020 8:39 AM
To: Seeley, Matthew
Subject: bluefish scope

Bluefish are a cyclical species. Always have been, always will be.

Going from 15 to 3 is not reasonable, nor warranted.

The public appetite for bluefish has decreased, not increased.
But those who do enjoy them should not be penalized for
bad models.

Regards,
Robert Switzer

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, February 26, 2020 3:23 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Ross Baker

Email: rvbaker15@gmail.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: Virginia

Gear type(s) used:: Hook and line or handline

Comments: Reduce commercial catch, not many rec anglers keep bluefish.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 8:28 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Roy Miller

Email: FISHMASTER70@COMCAST.NET

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: Delaware

Gear type(s) used:: Hook and line or handline

Comments: Sector allocations between commercial and recreational fisheries should be adjusted according to the revised coastal MRIP estimates. If we are going to use revised and back-calculated MRIP estimates to determine if the stock is overfished or if overfishing is occurring, then we should use these same estimates for allocation purposes, regardless of which years are employed in the calculations.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Friday, March 13, 2020 8:30 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Sarah Schumann

Email: schumannsarah@gmail.com

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Rhode Island

Gear type(s) used:: Gillnet

Comments: I work on a state waters gill net vessel out of Point Judith, RI. Bluefish are our primary target species. My captain and I would like to see a larger minimum size for bluefish: 18 inches to the north and 16 inches to the south. We would also like to see a shift in quota for a commercial from the south to the north to accommodate larger landings to the north. We would also like to see some quota shifted from the recreational to the commercial side, because more people are eating bluefish now and they should be made available to the general public in the markets. We are only getting 14% commercial and 86% recreational; it would be nice to get 30% commercial. In recent years, we haven't had any problem filling our quota here in Rhode Island, and we've had to ask for quota transfers on a regular basis from states further south. It is obvious that the trend for bluefish is a movement to the north, and the regulations needs to keep stride with climate change. Thank you for the opportunity to comment.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 10, 2020 2:01 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Scott Hall

Email: hall.scott.27@gmail.com

How would you describe your primary role in the fishery?: Other

Primary state(s) you land bluefish in:: Maine, New Hampshire, Massachusetts, Rhode Island

Gear type(s) used:: Hook and line or handline, Gillnet

Comments: I regret to make this certainly unpopular comment about the commercial bluefish regulations and as they may apply to other regulations. I am a former commercial fisherman from Gloucester MA, and now work as a scientist.

I think the approach taken worldwide by fishery regulators is to task scientists to evaluate catch data, estimate stocks and regulate harvest so that people can retain as much biomass as possible while having a stock maintain and or grow. There are inherent flaws in this type of measurements and speculative correlations cannot be made accurately even if it is best available science.

My recommendation is that for the bluefish stock and for other stocks, that the regulations be made on the far conservative side and to take pressure off the stocks for a series of years to see if it can rebound, rate of rebound, and to increase environmental monitoring; to attempt to evaluate scientifically, changes in temperature and water chemistry to comprehensive stock evaluations to see the ability of the stock to rebound. Regulations following that scheme of wait and evaluate will undoubtedly be unpopular in the industry and among recreational anglers for any given crashing stock. Sadly, I am okay with unfair to people and fleets as I want stocks healthy, and not only just being there, for when my children look to the ocean.

Specific to this regulation, I am unable to find if the raw data, believe that this is a case of risk management and the risks of under regulating stocks to keep fisherman semi-happy and commercially viable will ultimately be detrimental to the stocks years from now as is being witnessed in multiple fisheries around the globe.

Thank you for your time,

Scott

(Sent via *Mid-Atlantic Fishery Management Council*)

From: SCOTT LUNDBERG <reelsportfishing@aol.com>
Sent: Tuesday, February 18, 2020 3:07 PM
To: Seeley, Matthew
Subject: Bluefish Scoping Comments

Sent from Mail for Windows 10
As a full time charter boat captain in Pt. Judith Rhode Island, I would support separating the for hire industry from the private boat and shore angler in the recreational category. Historically, the bluefish has been the bread and butter of the charter boat industry in the Northeast. This would give our industry stability and our daily electronic reporting would give us accountability. Sincerely Yours, Captain Scott Lundberg Reel to Reel Sportfishing LLC www.reeltoreelsportfishing.com

Bluefish Comments for the supplemental scoping hearings to gather public input for the Bluefish Allocation and Rebuilding Amendment at Toms River on February 18, 2020

Respectfully resubmitted 02/21/2020
Sergio Radossi
Ridgefield Park, NJ

Bio; Retired Engineer/ Eng. Exec., Past President Hudson River Fishermen's Assn, Past Director NJ Outdoor Alliance, Current member NJ Marine Fisheries Council, member various sportsmen's organizations.

Note to Mr. Matthew Seeley, Fishery Mgmt. Specialist, MAFMC,
Pursuant to the February 18, 2020 Toms River, N.J. Bluefish supplemental scoping public hearing, please replace my comments dated 2/18/2020 with this comment submission dated 2/20/2020.

I have revised my comments to better follow your outline "Issues for Public Comment", pg. 10 of your Supplemental Scoping and Public Information Document distributed at the 2/18/2020 hearing.

Please note that I am available to answer any questions and assist as time allows.
Thank You
Sergio Radossi

Issue 1: FMP Goals and Objectives

Issue 1.1 Increase understanding of the stock and of the fishery.

The hearing was attended by a good cross section of commercial, party boat and larger for-hire (6+ people) Captains/Owners along with individual/private anglers. These folks offered firsthand information on the current state of the subject fishery. These fishermen have decades of knowledge, experience and wisdom which they are willing to share with fisheries managers. There is an obvious disconnect between the end users (the fishermen) and fisheries managers.

I strongly urge that the fishery managers responsible for the current and future regulations use these (and like) fishermen as consultants.

Issue 1.2 Provide the highest availability of bluefish to the U.S. fisherman while maintaining, within limits, traditional uses of bluefish (defined as the commercial fishery not exceeding 20% of the total catch)

Please take my comments as a constructive critique, but issue 1.2 is an opened ended goal. I suggest "*highest availability*" be replaced with "*meeting the SSB target*". Also the term "*within limits*" is included in the issue 1.2 goal should either be defined or deleted.

In short, all goals must be state a desired outcome, be time bound and must include metrics. If the goals are not met on time, initiate a corrective action to get the project back on track. Note that this is the standard operating procedure in the many successful private sector companies.

However, I believe that I do understand your intent with issue 1.2; my reply is as follows;
In order to rebuild the fishery we need good, verifiable data *, include environmental factors , use the experience and wisdom of the folks who are out on the water(fishing), develop metric and time bound project goals which address the needs of your customers. Your customers are the resource and both the commercial and recreational sectors.

*Insure that the SSB target is both realistic and attainable. If the biomass target has never been met in the past, it is a strong indicator that it is wrong, it should not be used and it must be rejected. To state the obvious, poor input data produces poor results.

Issue 1.3 Provide for cooperation among coastal states, fisheries managers…. Etc.
Great question, I think you're looking at a major root cause issue. Unfortunately, my experience shows that the odds of having fisheries management decision makers, working with end users is unlikely (at best). Please see comment 5 below, for additional information.

Issue 1.4 Promote compatible management regulations between state and federal jurisdictions.
Again great root cause issue, but beyond public's pay grade.

Issue 1.5 Prevent recruitment overfishing.
I do not understand this goal as stated. Are we talking about more restrictive size, bag and season limits or closing the fishery? Again, I see this as an open ended goal.

Issue 1.6 Reduce the waste in both commercial and recreational fisheries.
Please see comment 6 below, for additional information as related to the recreational sector.

Regarding Management Questions; refer to comments and addendum for issues 1.1 -1.6 above.

Issues 2, 3, 4, 5;
I believe these where adequately covered at the 2/18/20 bluefish scoping hearing, but I reserve the right to provide additional future comments.

Other Issues;

Comment 1) SSB Target:

In addition to my comments is section regarding the SSB Target.

Fisheries managers have consistently preached the importance of maintain consistency in data collection and process. My understanding is that the current 200,000 MT value is the result of a 2018 change in MRIP's data collect process. This changed the way MRIP estimates the recreational catch effort resulting in a much higher catch effort. The 2018 change was used to recalibrate (back date) the SSB values 2018 thru 1985.

Given the importance of maintaining consistency in data collection and process, **I am requesting that the MAFMC Bluefish committee review this, verify that errors were not introduced and provide a report to NJ anglers via the NJMFA and the NJMFC.**
I am also requesting that a corrective action plan be implemented to address any issues found.

Comment 2) MRIP Data: Estimated Anglers actively fishing.

In the past 37 years the number of party and charter boats has greatly deceased. For example: per a post from Capt. Bogan in May 2017, approximately 50 party and charter boats have gone out of business between 1996 and 2006. I do not have information on closure since 2006, but I am sure that organizations such as the United Boatmen can help you with this.

We must also include party and charter boats that have closed shop in adjacent states (NY and Delaware). Recently the Brooklyn (from Jamaica Bay) has ended operations in February due to the new bluefish regulations.

Also consider that Hurricane Sandy, the recession of 2008 and the stricter regulations on even recovered species (such as black sea bass) greatly reduced both the number of private boats and the number of trips taken. There has been a reduction of over 50,000 private boat registrations. If we estimate 2 anglers per boat this is 100,000 few private boat anglers. Finally, consider that night blue fishing for years has not occurred for years.

Bottom Line there are few people fishing each year, the sport is dying.

Since there are few fishing resources available, fewer people must be fishing. **I am requesting that the MAFMC Bluefish committee demand that MRIP justify in writing how fewer people fishing results in overfishing today as compared to the 1980's, 90's etc., and provide a report to NJ anglers via the NJMFA and the NJMFC.**

I am also requesting that a corrective action plan be implemented to address any issues found.

Comment 3, MRIP Data Error example.

As a member of the NJ Marine Fisheries Council, I participated in a discussion regarding the option of a delayed start to springtime Striped Bass fishing in Raritan Bay. Raritan Bay is part of the NY/NJ boundary waters, the state lines runs along Ambrose channel to the Raritan Reach to the Kill Van Kull, approximately. It is fished by both NY and NJ anglers.

During the discussion on closure, I was informed that MRIP is charging 100% of the Striped Bass catch to NJ. This is blatantly incorrect and results in corrupt data. Given this major error, all MRIP efforts must be questioned. **I am requesting that the MAFMC Bluefish committee demand that MRIP justify in writing how such a blatant error occurred and was and provide a report to NJ anglers via the NJMFA and the NJMFC.**

I am also requesting that a corrective action plan be implemented to address any issues found.

Comment 4, Environmental Factors.

The current marine resource management process is focused on one tool. Quotas (size limits, catch limits season are just a subset of quotas). No fish species can be successfully managed using one restrictive management tool. Proof is that it has not worked to date.

Some areas that MUST be considered in the Bluefish management plan are (but limited to) forge (example, lack of sand eels), habitat, sand mining (destruction of habitat with regard to the impact on marine resources), resource availability (fish are reported to have moved offshore).

Considering that Bluefish is a marine pelagic fish found around the world in temperate and subtropical waters. They are not just an east coast inshore species. They have been documented to disappear for years, just to return in great numbers. They are cyclic.

Has anyone stop to ask where did the bluefish go? Perhaps look at the historical records on bluefish…before the creation of the MAFMC. And why did they disappear? There are many reports of large numbers of bluefish from folks fishing offshore.

I am requesting that the MAFMC Bluefish committee include environmental factors along with pelagic migrations as a possible cause of low numbers in the bluefish plan and provide a report to NJ anglers via the NJMFA and the NJMFC. I am also requesting that a corrective action plan be implemented to address any issues found.

Comment 5, Regarding Issue 1.3 Provide for cooperation among coastal states, fisheries managers…. Etc.

This comment speaks to the recreational fisherman's frustration in attempts to speak to and work with the NMFS and its component sections/departments.

A few years ago, New Jersey recreational anglers attempted to work with NMFS to resolve issues regarding regulations (summer flounder in particular). The process seems hopeful as a meeting between key sportsmen organizations and John Bullard, NMFS Administrator, and his staff. We all met at a NJ State facility in Ocean County. The outcome was a plan outlining items to move forward and "improve cooperation". Follow up letters were sent to Mr. Bullard. To the best of my knowledge this is where it ended. No responses, no plans, no further action. It was just a show.

Mr. Bullard was replaced by Michael Pentonyas. I know that some have attempted to open discussions regarding regulations, stock status, etc. Result… To the best of my knowledge no replies have been received.

One cannot fault the fishing community for its skepticism regarding cooperation with fisheries managers and the administration. I will say that I believe that NJFMA is trying to do its best with the cards they are dealt.

Recommended Corrective actions;

a) When special meeting are called, follow up correspondence and actions are a must. It is both unprofessional; and disrespectful to hold a meeting and then ignore the participants. This applies to all meeting participants including administrators. Better to not have any communication.
b) Initiate corrective actions to achieve process transparency, simplify reports (stop using marine fishery speak, it is not necessary and impresses no one except those writing the reports), Stop answering end users questions by saying, "look online" (for many end users, online access is equal to or worse than refusing to answer).
c) There is a perception that the NMFS, NOAA, and the councils and commission would like nothing better than ending the recreational fishery altogether (I have actually been told of verbal statements fishery managers to this effect), additionally we can look at the unchanged current black sea bass regulations on a fully recovered fishery, the threat to impose a 3 fish limit on scup and other examples as proof that the perception may be true. Corrective action, prove the perception wrong, by action not words or 10 year plans.

Comment 6; Issue 1.6 Reduce the waste in both commercial and recreational fisheries.
As the result of the most recent regulation issue regarding summer flounder and N.J.'s attempt to fight it by going out of compliance, a discard reduction plan was developed in a cooperative effort between NJ recreational fishermen and the NJMFA. This included the use of circle hooks, dehooking tools, proper release and fish handling education. The deliverable was to reduce dead discards and to try to achieve a future quota increase. This plan was approves by the TC, councils and commission. Unfortunately, there was no metric or timeline line in the plan. There was no follow up and even though the program had been accepted and implemented by recreational fishing community, there is no report showing if it actually reduced dead discards. There was no quota reduced. If a similar program is

initiated for bluefish, will it follow the same path as used above for summer flounder? Or will the program have metrics, be time bound and using management practices accepted by industry?

Then there is the question of developing a data collection smart phone app for the recreational sector. The fishery management community treats this subject like the plague. What is the fear in trying some different?

Recommendation; the marine fishery management community needs to stop doing the same thing over and over again and excepting a different outcome. If a different outcome is desired, one needs to assess the process and do something different.

Comment 7, Economic Impact of Recreational Marine Fishing Regulations, Funding and the best available science.

First and very important…I believe recreational support sustainable fisheries management. I believe most fishermen believe the same.

Second and very important… the current recreational marine fisheries management program is destroying the sport of marine fishing. Regulations are a one way street, ever more restrictive, it serves neither the fish nor the angler. Mission failed. **Conclusion….We need to change the process.**

Third and very important…Funding, It is understood that this is a data hungry process, it requires funding. It also requires working smarter, better tools, etc. **Conclusion….If you don't have the funding required to get the job done correctly, push for the funding…. Please do not shove another restrictive regulation thru the pipe and call it job done.**

Fourth and extremely important… Stop using the term "best available science (BAS), unless it actually is the best available science". That is an excuse for not meeting goals. Instead replace BAS with "the science needed to get the job done". If additional funding is needed, make it the issue.

Conclusion …. Stop using "BAS" as an excuse.

I am requesting that the MAFMC Bluefish committee include the Economic Impact of Recreational Marine Fishing Regulations, Funding and the best available science in the bluefish plan and provide a report to NJ anglers via the NJMFA and the NJMFC. I am also requesting that the term best available science be banned and replaced with "the science required to get the job done"

I am also requesting that a corrective action plan be implemented to address any issues found.

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 6:09 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Steve Bernardo

Email: getbig2@aol.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: North Carolina

Gear type(s) used:: Hook and line or handline

Comments: In NC waters Bluefish have never been endangered and always plentiful. It is not the fish of choice by many anglers. but is the bait of choice. The extreme restictive bag limits are not needed in our waters.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Squarespace <no-reply@squarespace.info>
Sent: Wednesday, February 26, 2020 1:27 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Steven Mines

Email: smines@me.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: Connecticut, New York

Gear type(s) used:: Hook and line or handline

Comments: I can confirm as a recreational angler the complete absence of this species from the fishing grounds I frequent in both Long Island Sound and the Peconic estuary. In addition to a complete lack of adult fish, the shocking lack of juvenile fish is of great concern.

While I believe strongly that commercial fisherman need to earn their living and therefore should continue to receive an appropriate allocation of adult fish, the taking of juvenile fish by either commercial or private anglers under the current dire circumstances would seem foolish.

For this fishery to rebound, no juvenile fish should be taken for a period of time (to be determined by the people that know and understand population dynamics). This suggestion is a bitter pill to swallow for a large group of recreational anglers, but I don't see any other way for this fishery to recover.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Top Hook <ssofabed@aol.com>
Sent: Friday, March 6, 2020 2:59 PM
To: Seeley, Matthew
Subject: General comments To SCOPING HEARING

Hi Matt

1) M.R.I.P. 😱

2) Bluefish, as records show, fish were in decline ,no efforts were made to tweak the decline.Instead business as usual.So ten years go by and BOOM we get hit with" OVER FISHING" WHICH MEANS , REBUILDING MANAGEMENT, In both the recreational and commercial industries. A ten year rebuilding plan , which was one of the options .I'm not getting any younger. We know that we will not see a 15 fish bag limit any more for the recs but hopefully we can get the commercial quotas back up.So I guess what I am asking is we need to make better management decisions, so we don't GET KICKED BELOW THE BELT AGAIN..

3)Sector separation,needs more evaluation. At this point perhaps a sector ALLOWANCE program. ex 3 bluefish, 5 bluefish for-hire. which is now in place. Scup 50/ 30 season, now we work on Sea bass, Fluke AND LOOK FOR THE SWEET SPOT. THE FOR -HIRE SECTOR WILL AND MUST REPORT ACCURATELY ON THE E- VTRS IN ORDER FOR THIS PROGRAM TO SUCCEED.

4) M.R.I.P. 😡

Thank You
Cap't Steven R. Witthuhn
AP MAFMC
AP ASMFC
MRAC N.Y.
Top Hook Fishing Charters Montauk N.Y.
35 yrs of Fisheries Involvement

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 3:45 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Taylor Ingraham

Email: tayloringraham@tightlined.com

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: Rhode Island, Connecticut, New York

Gear type(s) used:: Hook and line or handline

Comments: Thank you for allowing me the opportunity to comment on the ongoing management of bluefish.

Bluefish are an incredible light-tackle species to target, yet have relatively limited culinary value. As a result, the majority of bluefish that are caught by the recreational sector are then released. As new regulations are put into place and the fish are managed in the long-term, the focus on catch and release and the value of a bluefish in the water must be a top priority. There is an opportunity to manage these fish as a valuable recreational fish, by incorporating catch and release practices into managing the fish for abundance.

Accordingly, since catch and release anglers comprise such a large portion of bluefish that are caught each year, quota reallocation should NOT be considered or implemented.

Please approach bluefish differently than other fish, and manage them according to their value in the ocean, rather than on a dinner plate. We need strong regulations to ensure that bluefish are available to those who target them - as recreation - for years to come.

Thank you,

Taylor Ingraham

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Tom Fuda <tom.fuda@gmail.com>
Sent: Friday, March 6, 2020 6:41 AM
To: Seeley, Matthew
Subject: Bluefish Amendment Scoping Comments

Hello,

I am an avid recreational saltwater fisherman based in Connecticut. Last year I made at least 50 trips (the vast majority from shore) targeting striped bass and bluefish. I definitely noticed a reduction in the numbers and size of bluefish that I caught. I don't think I caught a bluefish bigger than 4 lbs last season.

As I read the allocation and rebuilding amendment, I see much talk of two sectors; commercial and recreational, but in reality, the management plan has effectively created three sectors, with the "recreational" sector being split into the "for-hire" sector, and "everyone else". I feel like this is a flawed and biased management / rebuilding plan. It gives a select and vocal few, access to kill more of the overfished bluefish stock than everyone else. Why should anglers that have access to, and can afford to pay for a boat trip have the right and privilege to kill more fish than the private boaters and shore bound anglers? This policy creates an adversarial situation between the two recreational sectors, and the clear appearance of favoritism to the for-hire sector in the management process.

Most of the recreational anglers that I know are more interested in seeing more and bigger bluefish available for the thrill of the catch (and release), than they are in killing more bluefish to take home to the table. The bluefish's value as table fare is relatively low. Their value is more as a sport fish (2nd only to the striped bass in the Northeast waters, IMO). The folks that pay money to go on bluefish boat trips should be bound by the same regulations as the rest of the recreational sector. To quote Mr. Spock: "The needs of the many outweigh the needs of the few".

Thank you for your time.

Sincerely,
Thomas Fuda

From: Squarespace <no-reply@squarespace.info>
Sent: Tuesday, March 17, 2020 10:39 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Thomas Smith

Email: bluefish4@comcast.net

How would you describe your primary role in the fishery?: Commercial

Primary state(s) you land bluefish in:: Massachusetts

Gear type(s) used:: Gillnet

Comments: Dear Council and Commission members,
My name is Tom Smith I own and operate two strike netters in Massachusetts commercial bluefish fishery; both boats are named Seawolf. I started the fishery in June 1981 and I've been at it ever since, though it is my livelihood it is also my passion. My landings in the 80's mostly provided the landings for Massachusetts to receive a 6.75% of the bluefish pie that we have had over the years. Most years this quota has been sufficient to carry us through this season but some years it has not been enough. Massachusetts DMF has been proactive during those years and has been able to secure quota transfers to keep its fisherman fishing and the hundreds of fish markets able to offer bluefish throughout the season. As we all know, a lot has changed in the 30 years since the bluefish management plan was put in place. Some states such as Virginia and Florida no longer have the fisheries that gave them the quotas that they still have. I believe if the quota is redistributed the last 10 years of landings should be the benchmark for what states are catching the bluefish and what states have been needing and receiving quota transfers to extend the season. Also, I think it is very important to have the mechanism in place to transfer fish from state to state as necessary. For the last 10 years, Massachusetts, New York and Rhode Island have had the most bluefish off their states. Though the landings have been off the last two years, this was predictable seeing as bluefish are offshore spawners and they had a couple of years with poor spawning conditions. The last two years we have seen a couple of strong year classes of mostly 1-3 pound fish that should be up to 5 pounds this season when they arrive in May. I've always believed the bluefish have come and gone based on their cyclic nature regardless of catch rates and fishing pressure. When I was growing up in the 60's bluefish were very scarce on Cape Cod but in the early 80's, they were at an all-time high. In the last 40 years, I've seen every variation of both boom and lean years that I feel is based on the success of particular spawning years. Thank you for your time.

Thomas Smith
Orleans MA

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Anthony Durso <surfzonelures@gmail.com>
Sent: Sunday, February 2, 2020 8:32 AM
To: Seeley, Matthew
Subject: scoping

hi ,
I feel the 3 fish recreational limit is good and would also like to see something done on snapper blues maybe a size limit or smaller bag limit. The commercial quota needs to be looked at also thank you

Tony Durso

From: Squarespace <no-reply@squarespace.info>
Sent: Saturday, February 29, 2020 8:21 AM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: Vincent Martella

Email: hammer1654@verizon.net

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New York, New Jersey

Gear type(s) used::

Comments: I enjoy shark fishing and Bluefish is the primary bait we use to catch shark. I usually shark fish with 1 other angler making for a total of 2 people on my boat. We often use more than 6 bluefish when the bite is good.
I would like to ask that there be some kind of exception to the 3 Bluefish per man rule while shark fishing. These bluefish that we use for bait are caught by rod and reel sometime over months and stored in our freezer until we us them. They are not caught the same day as we are shark fishing.
Please consider this when making your decision.

(Sent via *Mid-Atlantic Fishery Management Council*)

From: Vittorio Paternostro <vittoriopaternostro@gmail.com>
Sent: Tuesday, March 3, 2020 6:20 PM
To: Seeley, Matthew; Leaning, Dustin Colson
Subject: Bluefish regulation

Dear sirs,
I'm writing against limiting recreational fishing of bluefish to 3. It does't make an sense. I fish once in a while when possible, I respect all the laws and the beaches leaving them cleaner than the were. We eat the fish I catch, we don't bother animals for the challenge of the battle. I fish and hunt onl for eating. 3 for day it's not enough! there are thousands of them in each beach and we don't make a difference taking five or six home for our kids and our friends families once in a while when we can go fishing!!! professional and commercial fishing make a difference, why someone had the bad idea always to limit people's freedom!!!
Feel free to conctact me.

Respectfully
Vittorio Paternostro

+1 312 479 8997

From: Squarespace <no-reply@squarespace.info>
Sent: Monday, February 10, 2020 6:22 PM
To: Seeley, Matthew
Subject: Form Submission - Bluefish Supplemental Scoping

Name: William Royle

Email: wroyle@comcast.net

How would you describe your primary role in the fishery?: Recreational (private angler)

Primary state(s) you land bluefish in:: New Jersey

Gear type(s) used:: Hook and line or handline

Comments: your objective is to drive recreational anglers out of saltwater fishing through ever decreasing bag limits so kiss my ass.

(Sent via *Mid-Atlantic Fishery Management Council*)