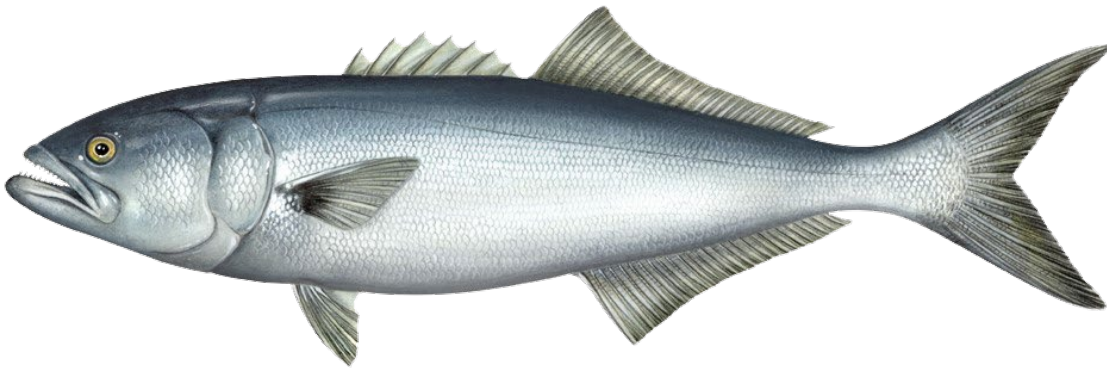


# BLUEFISH ALLOCATION AND REBUILDING AMENDMENT

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PUBLIC COMMENT SUMMARY DOCUMENT  
MAY 2021



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



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## 1 INTRODUCTION AND COMMENT SUMMARY

### 1.1 OVERVIEW

This document summarizes public comments on the Bluefish Allocation and Rebuilding Amendment. Through this action, the Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission (Commission) are considering potential modifications to the Fishery Management Plan (FMP) goals and objectives, current allocations between the commercial and recreational sectors, current commercial allocations to the states, initiating a rebuilding plan, revising the quota transfer processes, revising how the FMP accounts for management uncertainty, and revising *de minimis* provisions in the Commission’s plan. Additional information and amendment documents are available at: <https://www.mafmc.org/actions/bluefish-allocation-amendment>.

Five virtual public hearings were held between March 24 and April 8, 2021, targeted toward certain states or regional groupings of states (Table 1). Hearings were attended by 134 people in total (excluding Council and Commission staff). Not all attendees provided comments.

Written comments were accepted from February 22, 2021 through April 23, 2021. In total 361 individuals or organizations either provided written comments (84) or sent in a form letter (277) on this action. Some of these commenters overlapped with those providing comments at hearings.

In total, 378 unique individuals and organizations provided comments during hearings and/or in writing. Attempts were made so that individuals who provided multiple comments (e.g., in person and written, multiple in person, or multiple written comments) were only counted once towards the tallies included later in this document. In some instances, individuals provided in-person comments on behalf of an organization and those organizations also submitted written comments. In those instances, the individual and the organization comments were counted as one comment. The tables below differentiated comments received from individuals, organizations, and via form letter to help provide a clear picture of the comments received.

All public hearing comments are summarized in Section 2 of this document and all written comments are included in Section 3.

Ninety-two percent of the 378 individuals and organizations who provided in-person and/or written comments were primarily affiliated with the recreational fishery, and 5% with the commercial fishery (Table 2). About 80% of the comments associated with the recreational fishery came from the form letter.

**Table 1: Amendment public hearing schedule.**

Date and Time	Regional Grouping
Wednesday, March 24, 6-8pm	North Carolina, South Carolina, Georgia, and Florida
Thursday, March 25, 6-8pm	Delaware, Maryland, Potomac River Fisheries Commission, and Virginia
Tuesday, March 30, 6-8pm	Connecticut and New York
Thursday, April 1, 6-8pm	Maine, New Hampshire, Massachusetts, Rhode Island
Thursday, April 8, 6-8pm	New Jersey

**Table 2: Number of individuals and organizations who provided in-person and/or written comments (including 277 form letters which were associated with the recreational sector) by primary affiliation.**

Sector	Individuals	Organizations	Percent of Total
Recreational	333	13	92%
Commercial	14	4	5%
Unknown/not specified	10		3%
Other	2	1	<1%
Multiple	1		<1%

## 1.2 COMMENT SUMMARY

Public comments are summarized in the text and tables below grouped by management issue (commercial/recreational allocation, commercial allocations to the states, rebuilding plan, sector transfers, management uncertainty, *de minimis*, and general comments). Only those topics addressed by more than three individuals or organizations, or those directly related to specific alternatives are included in the summaries below. However, all comments are included in sections 2 and 3 of this document.

A total of 37 commenters provided feedback on the FMP Goals and Objectives. Many of these comments were unique with specific suggestions making it hard to tally across similar comment themes. As such, comments contained in section 2 and 3 should be carefully read and considered. However, there were a few reoccurring themes that can be highlighted. For example, many commenters supported consideration of managing for optimum yield in the FMP Goals and Objectives. Four recreational organizations emphasized that the Magnuson Stevens Act (MSA) requires fishery management measures achieve optimum yield, defined as a fishery’s maximum sustainable yield reduced by any relevant economic,

social, or ecological factor. Several other commenters referenced the socioeconomic benefit of reduced harvest and increased abundance to catch-and-release anglers. A few comments referenced the need for better accountability across both sectors. Several commenters said that “fair and equitable” should be clearly defined in the FMP Goals and Objectives. Several other individuals commented on the importance of forage fish, the need to improve our understanding of the ecological role of bluefish and expressed a desire to implement ecosystem-based management. A few other comments included recognizing the cyclical and environmentally driven nature of the bluefish stock. Lastly, a few individuals said that environmental stressors should be addressed, and they were concerned about the impacts of sand mining and beach replenishment on inshore bluefish habitat.

Feedback on the commercial/recreational allocation alternatives was mixed. An individual’s or organization’s primary sector affiliation is indicative of which alternative was supported. For example, 20 commenters supported status quo allocations, and the majority of these 16 individuals and 4 organizations were affiliated with the commercial sector. In total, 287 commenters supported reallocating 87% to the recreational sector and 13% to the commercial sector (alt 2a-3). This alternative received support from the most organizations and from 277 form letters. Alternative 2a-2, which allocates 89% to the recreational sector and 11% to the commercial sector, also received significant support from 12 individuals and 4 organizations. The remaining alternatives received support from less than 10 individuals and organizations. The vast majority of commenters were opposed to phasing in allocation changes with 296 opposed and only 5 in support. However, it is worth noting that most comments that were in support of status quo commercial/recreational allocations did not provide input on the phase-in alternatives.

Support was spread fairly evenly across all four state commercial allocation alternatives. That being said, alternative 3a-2 received the most support with 8 individuals and 3 organizations expressing this reallocation alternative as their preference. Generally speaking, commercial stakeholders from states who stood to benefit from reallocation voiced support for using a more recent time series. Conversely, commercial stakeholders from states that would lose quota from reallocation voiced support for status quo, with only a few exceptions. In total, eight commenters supported a phase-in approach, only slightly more than the 6 commenters that supported no phase-in. The vast majority of comments received on the trigger approach expressed how complicated the approach was and did not support its use in management. Nine individuals and organizations supported providing states with a minimum default allocation versus 5 commenters who were opposed to the idea. Many commenters expressed support for the minimum default allocations in an effort to reduce regulatory discards in states that would otherwise have no allocation.

A total of 293 commenters said they supported the 7-year constant fishing mortality rebuilding plan, 14 supported the 5-year P\* approach, 12 supported the 4-year constant harvest approach, and 5 supported taking no action on rebuilding. A few individuals who supported the 7-year rebuilding plan also voiced support for implementing a 10-year plan to allow the stock plenty of time to rebuild. Ten commenters voiced skepticism that the stock would be able to rebuild by the target date. Several reasons were provided including: the stock is cyclical or environmentally driven, the population is offshore, and abundance will not be detected inshore, or fishing mortality is not a large factor in the stock’s ability to rebuild. Seven commenters said that the lack of forage fish is a significant factor in the bluefish stock’s ability to rebuild. Lastly, 20 individuals said that they rarely encounter bluefish anymore and that drastic and immediate action should be taken by the Board and Council to rebuild this stock.

A total of 288 commenters said they support bi-directional transfers between the sectors and 15 supported maintaining the status quo transfer process. Similarly, a total of 288 commenters supported a 10% sector transfer cap, and 12 supported the status quo cap of 10.5 million lbs. Commenters who provided a rationale

for not allowing b-directional transfers tended to say that they were wary of using Marine Recreational Information Program (MRIP) data to analyze the recreational sector's short term need for quota. Those who supported bi-directional transfers often mentioned equity as an important reason for allowing transfers both ways. Many commenters did not think transferring quota during a rebuilding period was a good idea. Finally, 17 individuals and 6 organizations thought that quota should not be transferred between sectors at all.

In regard to the management uncertainty issue, 6 individuals, 8 organizations and the 277 people who submitted a form letter were in support of making no changes to the way that management uncertainty is applied through specifications. By contrast 19 individuals and 5 organizations recommended updating management uncertainty so that it may be applied to each sector without negatively affecting the other sector.

A total of 14 commenters supported the status quo *de minimis* alternative that only exempts states from fishery independent monitoring. Approximately the same number of commenters supported updating the *de minimis* provision to allow states some level of flexibility in setting recreational measures, but support was spread amongst alternatives 7b-e. Those who voiced support for updating *de minimis* said that anglers should be allowed to have unrestrictive measures when fishing in states where bluefish are rarely encountered. Others said that it should not matter what their measures are considering that they have minimal impact on the health of the stock.

Reoccurring general comments are also listed at the end of the table. These comments either pertain to multiple management issues or are not directly related to the management issues under consideration in this amendment. Twenty-two individuals and organizations said that management should account for the catch-and-release aspect of the fishery and recognize the value of fish left in the water. The context in which this was said varied by commenter, but many said this in reference to managing for higher abundance to recognize the economic value of the sport fishing industry. Many also shared this sentiment in support of halting sector transfers. Ten commenters said that recreational reporting and accountability need to be improved, and similarly 4 individuals thought that the recreational discarding issue should be addressed by management. Nine commenters expressed strong concerns with using the MRIP data for management and thought that the data was not believable. The remaining reoccurring comments were in reference to the recreational bag and size limit or expressing the need to increase or lower the commercial quota.

**Table 3: Summary totals of comments received on the amendment. Totals should not be summed between rows as this would result in double counting of individuals and organizations who commented in multiple categories.**

Management Issue		Number of Form Letters/Individuals/Organizations			
<b>Commercial/Recreational Allocation</b>		<b>Form Letter</b>	<b>Individuals</b>	<b>Organizations</b>	<b>Grand Total</b>
2a-1	83% Rec, 17% Comm (Status quo)		16	4	20
2a-2	89% Rec, 11% Comm		12	4	16
2a-3	87% Rec, 13% Comm	277	3	7	287
2a-4	86% Rec, 14% Comm		8	1	9
2a-5	84% Rec, 16% Comm		3	1	4
2b-1	No Phase-in	277	9	10	296
2b-2	Phase-in		2	3	5
<b>Commercial Allocations to the States</b>		<b>Form Letter</b>	<b>Individuals</b>	<b>Organizations</b>	<b>Grand Total</b>
3a-1	Status quo		8	1	9
3a-2	5 year		8	3	11
3a-3	10 year		8	2	10
3a-4	½ 1981-1989 and ½ 2009-2018		6		6
3b-1	No Phase-in		5	1	6
3b-2	Phase-in		5	3	8
3c-1	No Trigger		7	2	9
3c-2	Pre-Transfer Trigger		1		1
3c-3	Post Transfer Trigger				
3d-1	No Minimum Default Allocation		3	2	5
3d-2	0.10% - Minimum Default Allocation		4	1	5
3d-3	0.25% - Minimum Default Allocation		3	1	4
<b>Rebuilding Plan</b>		<b>Form Letter</b>	<b>Individuals</b>	<b>Organizations</b>	<b>Grand Total</b>
4a	Status quo/No action		5		5
4b	Constant harvest (4 years)		11	1	12
4c	P* approach (5 years)		12	2	14
4d	Constant F (7 years)	277	5	11	293
General comments on rebuilding	Stock is cyclical/environmentally driven/offshore; fishing mortality is not the problem		7	3	10
	Bluefish abundance is low/we do not see bluefish anymore/immediate and drastic action needed		20		20
	Bluefish stock is hurt by low abundance of forage fish		6	1	7

Management Issue		Number of Form Letters/Individuals/Organizations			
<b>Sector Transfers</b>		<b>Form Letter</b>	<b>Individuals</b>	<b>Organizations</b>	<b>Grand Total</b>
5a-1	No Action/Status quo		12	3	15
5a-2	Allow transfer both ways	277	5	6	288
5b-1	No Action/Status quo		10	2	12
5b-2	Sector transfer cap: 10%	277	5	6	288
General comments on transfers	Quota should not be transferred between sectors		17	6	23
<b>Management Uncertainty</b>		<b>Form Letter</b>	<b>Individual</b>	<b>Organization</b>	<b>Grand Total</b>
6a	No Action/Status quo	277	6	8	291
6b	Post Sector-Split		19	5	24
<b>De Minimis</b>		<b>Form Letter</b>	<b>Individual</b>	<b>Organization</b>	<b>Grand Total</b>
7a	No Action/Status quo		12	2	14
7b	Recreational De Minimis – no management measures		2		2
7c	Recreational De Minimis – state-selected management measures		2	2	4
7d	Recreational De Minimis – rollover management measures		2		2
7e	Recreational De Minimis – 2020 management measures		4	1	5
<b>General Comments</b>		<b>Form Letter</b>	<b>Individual</b>	<b>Organization</b>	<b>Grand Total</b>
Management should account for the catch-and-release fishery (value of fish left in the water)			13	9	22
Recreational reporting and accountability need to be improved			7	3	10
Implement a minimum size limit			9		9
Strong concerns with MRIP data; unbelievable/unreliable			6	3	9
Lower the bag limit			6		6
Increase the bag limit			3		3
Cut the commercial quota			6		6
Increase the commercial quota			4		4
Address recreational discard issue			4		4

## 2 PUBLIC HEARING SUMMARIES

A summary of each public hearing is provided below. Due to the complexity and high number of amendment alternatives, each management issue was presented and commented on individually. Comments are summarized by hearing and individual comments are grouped by management issue and paraphrased.

### 2.1 NORTH CAROLINA, SOUTH CAROLINA, GEORGIA, AND FLORIDA

Wednesday, March 24, 2021, 6:00 p.m.

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**Attendees: (18 excluding Council/Commission staff):** Chris Batsavage, Michael Carotta, Michelle Duval, James Fletcher, Cynthia Ferrio, Sonny Gwin, Hannah Hart, Doug Haymans, Dewey Hemilright, Rusty Hudson, William Mandulak, Thomas Newman III, Will Poston, Art Smith, Eric Summers, Sara Winslow, Amy Zimney, Wes Townsend

**Summary:** The meeting started with an introduction and briefing from the hearing officer Chris Batsavage (NC). Five members of the public offered public comment on the amendment alternative sets. The majority of comments were focused on the allocation alternatives with an emphasis on ensuring quotas remain at levels that support positive fishery participation from both sectors. Some members of the public expressed their frustration with the complexity of alternatives associated within the commercial allocations to the states. The two who spoke on this issue were supportive of maintaining status quo commercial allocations for their respective state to ensure quotas do not fall much lower than the current levels. Feedback was mixed on how to proceed with the rebuilding plan and the transfer process. Members of the public did express their frustration with the current stock status and offered comments to that effect. The two comments received on management uncertainty were in support of adopting sector specific management uncertainty. Finally, the one comment received on *de minimis* status voiced support for status quo. Questions from the public mainly focused on the new MRIP estimates, the overfished stock status, current quotas and management measures, and the transfer provisions.

#### Comments

##### FMP Goals and Objectives

- **William Mandulak (Recreational – NC):** I am concerned about how you are going to evaluate sustainable harvest, given migratory patterns of bluefish. Are you taking measurements from ME-FL? How are you going to do that? In that objective, you said promote practices that reduce discard mortality within the commercial/recreational fishery. Does that mean if we find discard mortality is high in gillnets/trawl we ban that gear? I am confused when you say we are going to give fair and equitable access. If you have 1,000 people on the beach fishing for bluefish, and maybe 1000 commercial fishermen fishing for bluefish, how do you determine equitability?

##### Commercial/Recreational Allocation

- **William Mandulak (Recreational – NC):** Many of the changes increase the recreational allocation. However, over a long period of time there were transfers from the recreational to the commercial sector. Without knowing what the specific impacts are going to be on the fishermen that are on the beach, we might as well just take the most we can get. But, I think it's important to provide a maximum allocation to the commercial sector as well. Therefore, keep things status quo for now.



- **Thomas Newman (Commercial – NC):** 2a-1 (status quo) allows for adequate commercial allocation. Commercial fishing reporting and accountability happens in real time during the season. Last year, we went to a 300-pound limit to avoid going over our limit. The recreational sector catch is not accounted for until later in the year. We have no bycatch in our gillnet fishery.
- **James Fletcher (United National Fisherman’s Association, Commercial – NC):** We are using MRIP data which is considered the best available science. It looks to me that we are overfished because of the MRIP estimates. These estimates are not based on data from individual fishermen. Would we be better off to require every saltwater recreational fisherman to register?
- **Rusty Hudson (Directed Sustainable Fisheries, Inc., Other – FL):** Florida has increased its commercial landings in the recent past. Do not lose us in the next stock assessment because we have had a good signal. Status quo or 2a-5 to offer a reasonable allocation to the commercial sector.

#### Commercial Allocations to the States

- **Thomas Newman (Commercial – NC):** Status quo across the board. I may not be well versed in it all, but I think the fishery has been managed well. Status quo for trigger and minimum default as well.
- **Michael Carotta (Commercial - MA/NC):** Status quo because I am not comfortable in the disparity in some of the proposed alternatives.

#### Rebuilding Plan

- **James Fletcher (United National Fisherman’s Association, Commercial –NC):** 2006 MSA required recreational anglers to register. Why do we have to follow MSA under this rebuilding plan? Commercial landings in NC have decreased due to lack of access to the resource, because inlets have been closed which doesn’t allow boats to go out easily. We must comply with all requirements of MSA! The Council should have individual registration of recreational fishermen. When is management going to come up with something new to solve the problem? Would it be possible for the Council and ASMFC to have foreign scientists to come in and see if this stock is actually overfished?
- **Thomas Newman (Commercial - NC):** The commercial sector has a long history of understanding their harvest. Commercial limits should not change because we have not gone over limits and do have the ability to close when necessary. We need real time recreational data. I do not have a lot of faith in the MRIP data. We want to continue to harvest at the rate we are at now.
- **William Mandulak (Recreational – NC):** It is frustrating that we have been under our limits by transfers, but now we do not have that ability to transfer since we are overfished. As a recreational fisherman that wants to be fair to both sectors, I suggest alternative 4d. The longer-term plan allows for the stock to recover over more time and allows the fishery to get to a higher biomass level.

#### Sector Transfers

- **Thomas Newman (Commercial - NC):** 5a-1 and 5b-2. Status quo has been working very well for the commercial sector.

- **William Mandulak (Recreational – NC):** Why do we do transfers at all? If the stock is not overfished, I would support 5a-2 to allow bidirectionality.
- **Michael Carotta (Commercial - MA/NC):** As a commercial fisherman I am more and more aware of the place recreational bluefish holds in the culture. Family, kids, and fishermen are thrilled to go blue fishing. I am against any transfer that puts the recreational fishermen’s quota at risk. Secondly, I was hoping more of this hearing to focus on abundance and how we can conserve the fishery. There are bigger and more important things to talk about to restore the fishery.

Management Uncertainty

- **Thomas Newman (Commercial - NC):** Each sector should be responsible for its own management uncertainty. I support 6b.
- **James Fletcher (United National Fisherman’s Association, Commercial – NC):** Why is fisheries management associated with so much uncertainty?
- **William Mandulak (Recreational):** There will always be management uncertainty since these fish are always on the move (chasing bait and different water temperatures). The best we will ever be able to do is to have a level of uncertainty we are able to deal with. If I had to vote, each sector should have their own uncertainty. Therefore, I support 6b.

De Minimis

- **Thomas Newman (Commercial - NC):** De minimis states should have the same regulations as the rest of the states (status quo – 7a). All states should have the same federal measures.

**2.2 DELAWARE, MARYLAND, POTOMAC RIVER FISHERIES COMMISSION, AND VIRGINIA**

Thursday, March 25, 2021, 6:00 p.m.

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**Attendees (24 excluding Council/Commission staff):** Chris Batsavage, John Bello, Joan Berko, Alan Bianchi, Ellen Bolen, John Clark, Eric Durell, Michelle Duval, James Fletcher, John Ford, Martin Gary, Pat Geer, Sonny Gwin, Dewey Hemilright, Michael Luisi, Olivia Phillips, Michael Platt, Will Poston, Somers Smott, David Stormer, Jonathan Watson, Angel Willey, Roger B Wooleyhan Jr, Erik Zlokovitz

**Summary:** The meeting started with an introduction and briefing from the hearing officer Mike Luisi (MD). This hearing experienced low turnout and as a result there were only four individuals who provided a comment or question on the management issues. Three of the four people who spoke were Council members. The one member of the public who spoke at the hearing said that bluefish is currently not a priority commercial species for this region. While he was supportive of a lower commercial allocation to Delaware, he wanted to ensure that state to state transfers remain as an option to allow access to the resource should it become more abundant in the future. Staff were also asked several questions regarding when amendment changes would be implemented, the rebuilding timeline, and if rebuilding should be removed from the amendment.

**Comments**

FMP Goals and Objectives

No comment offered.

Commercial/Recreational Allocation

- **Roger Wooleyhan (Commercial – DE):** When will we know what the state specific quotas will be after you make these changes?
- **Sonny Gwin (Council Member – MD):** Have there been any problems with the transfer provisions? Is there a race to access quota transfers? In MD, we have been not catching our full quota and have been transferring it away. If through reallocation we lose quota, we may not have the ability to use excess quota or transfer it away.

#### Commercial Allocations to the States

- **Roger Wooleyhan (Commercial - DE):** In the 1970s there were a lot of people who were catching bluefish. Nowadays bluefish isn't worth much and people fish for other species. There are only a few commercial fishermen targeting bluefish in our area. Larger bluefish are moving further offshore, and we do not go far enough out to target them. However, I am concerned that because we haven't been fishing for bluefish we could lose access to quota. I don't want a situation where bluefish become abundant again later on and we aren't be able to catch them. If state-to-state transfers are able to be used in the future to give us access to bluefish, I would be ok with smaller allocations since our current effort is so low.

#### Rebuilding Plan

- **Mike Luisi (Council Member - DE):** Do you think there is any chance that we will need to pull rebuilding out of this amendment to address it more quickly?
- **David Stormer (Council Member - DE):** Do you think the 7-year rebuilding plan will be able to be fully rebuilt within the 10-year MSA requirement given this started in 2019?

#### Sector Transfers

No comment offered.

#### Management Uncertainty

No comment offered.

#### De Minimis

No comment offered.

## 2.3 CONNECTICUT AND NEW YORK

Tuesday, March 30, 2021, 6:00 p.m.

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**Attendees:** (36 excluding Council/Commission staff): Chris Batsavage, Alan Bianchi, Christopher Borgatti, Colleen Bouffard, Gary Bowman, Ted Burdacki, Floyd Carrington, Maureen Davidson, Justin Davis, John DePersenaire, Anthony DiLernia, Sandra Dumais, Michelle Duval, Mark Ellis, Julie Evans, James Fletcher, Dan Farnham, Dan Farnham Jr., Cynthia Ferrio, Timothy Froelich, Tom Fuda, Matthew Gates, William Goeben, Kurt Gottschall, Emerson Hasbrouck, TJ Karbowski, James Monzoli, Jeff Moore, Jerry Morgan, Cheri Patterson, Mike Plaia, Will Poston, Paul Risi, Deri Williams, Steven Witthuhn, Erik Zlokovitz

**Summary:** The meeting started with an introduction and briefing from the hearing officers, Maureen Davidson (NY) and Justin Davis (CT). In total, eight people offered comments on the amendment alternative sets. Comments offered under the FMP goals and objectives section consisted of several on the water observations, but a few individuals commented on the fact that there is economic benefit to caught and released bluefish. Four people supported status quo commercial/recreational allocations. Of the comments received on commercial allocations to the states, two individuals supported using the hybrid time series that recognized historical landings and recent trends. One individual supported alternative 3a-3d-2, which would provide a minimum default allocation of 0.1% to every state. Regarding rebuilding, one person supported 4b, another 4d, and two others offered their thoughts on why the rebuilding options are problematic. When sector transfers were discussed, two people supported bi-directional transfers, one person supported the status quo process, and two people supported the status quo transfer cap. In regard to management uncertainty, two people spoke in favor of sector-specific management uncertainty (6b). Lastly, one individual supported *de minimis* alternative 7e, which would allow *de minimis* states to set recreational management measures equal to those that were in place in 2020.

Questions from the public covered a variety of topics including the overfished stock status, current quotas and management measures, the validity of the new MRIP estimates, and whether the transfer provisions can occur during rebuilding. Some were concerned about the probability of rebuilding within 10 years and the consequences of not rebuilding within the set timeframe. Others asked why the ten-year plan was not included in the alternative set and thought that ten years would be the best rebuilding duration. Many members of the public expressed frustration with the complexity of the alternatives. Individuals offered their perspective on aspects of the amendment they understood; however comments may have been limited because individuals did not want to comment on alternative sets they did not fully understand. Staff indicated they are happy to work with any members of the public offline to better understand all the alternatives.

### Comments

#### FMP Goals and Objectives

- **Tom Fuda (Recreational - CT):** The goals and objectives talk about discard mortality. There is a recreational sector that practices catch and release. To this group, a released fish is not a wasted fish. The goals should consider the fact that there is economic benefit associated with released fish.
- **TJ Karbowski (For-Hire - CT):** There is little retention for recreational anglers. Bag limits were 15 fish and now they are at 3 fish. Often, we do not keep too many fish. To put a rough estimate, out of 100 fish that hit the deck, we maybe only kept 10.

- **Timothy Froelich (Commercial - NY):** How and why are we now under strict management measures? The fishery was over managed to the point where we were not able to harvest enough fish. The larger fish ate the smaller fish and then the older fish died of old age. As water quality deteriorates the bluefish migrate further offshore to cleaner water. They are no longer where they once were.
- **James Fletcher (United National Fisherman's Association, Commercial - NC):** I agree with the water clarity comment. Also, why are we using MRIP to manage these fish? Why do we still not have required recreational reporting? Why has management not mandated barbless hooks as a better release practice if this is a catch and release fishery? We need to go to an international party to assess stock status. NMFS says we are overfished, but we are not!
- **TJ Karbowski (For-Hire - CT):** I do not know the specifics of the year classes. However, these fish spawn more offshore where we cannot keep tabs on them. It is a cyclical spawning issue. This is not a recreational or commercial fishing issue. In 2013, we had the last year of alligator bluefish in Long Island Sound, after that, the menhaden were basically gone. Besides the 2020 season, there were not many menhaden in recent years. The small harbor-sized bluefish eat bay anchovies. The larger bluefish are following bunker around. This past year we caught large bluefish and large stripers that were following the menhaden. When NC banned omega protein from their waters in 2014, they depleted the menhaden fishery farther north. Since then, we have problems with Omega protein exceeding their cap in our waters.

#### Commercial/Recreational Allocation

- **Tom Fuda (Recreational - CT):** In favor of status quo, no action.
- **TJ Karbowski (For-Hire - CT):** Status quo unless there is a large increase in commercial demand. We have to pick and choose our battles. Ultimately, the recreational sector is not affecting these fish.
- **Dan Farnham Jr. (Silver Dollar Seafood Inc., Commercial - NY):** I know overfishing is not currently occurring, but how close are the recreational landings to the RHL? Also, what is the rate of dead discards? Why is there not an alternative that would readjust the historical allocation (1981-1989) using recalibrated MRIP estimates as we have done for black sea bass and scup? For the alternatives, I prefer status quo, but I would like to see the 1981-1989 data use the recalibrated estimates instead.
- **Mike Plaia (Commercial/Recreational - CT/RI):** Try to get the allocations in line with revised MRIP data. I prefer 2a-4 or 2a-5 with no phase-in.
- **Timothy Froelich (Commercial - NY):** Status quo for now. I agree with Dan Farnham that one side should not be restricted while the other sector has accountability measures. For NY the quota was 200,000 pounds, which is not large enough to have a fishery. Last year, we were constrained by our limits very early in the year. Bluefish are so abundant that we struggle to avoid them while fishing for other species.
- **Tony DiLernia (Council member - NY):** I want to give historical context to the amendment 1 decision and why I supported (at that time) the ability to transfer from the recreational sector to the commercial sector. From 1981-1989 I was active on headboats. When fish were caught by headboats they were caught recreationally but often sold commercially. That is why I support the

transfer. While some of those fish were counted as recreational fish, they were sold as commercial fish.

- **James Fletcher (United National Fisherman's Association, Commercial - NC):** Tony brings up a good point - If the recreational sector was selling fish we should see if that was illegal or not (at the time). ASMFC is not requiring saltwater anglers to register. Why are we enforcing the need to rebuild but not enforcing the 2009 saltwater registration requirement? We need to implement total retention and ban barbless hooks.
- **TJ Karbowski (For-Hire - CT):** 99.99% of the time bluefish are caught right in the mouth and I do not see any reason to mandate the hooks for bluefish. Once you know how to use a de-hooker or pliers, there is little to no damage and it does not affect mortality.

### Commercial Allocations to the States

- **Timothy Froelich (Commercial - NY):** Even if NY doubles its allocation, the 200,000-pound quota doubled is still only 400,000 pounds, which is still not enough. The 200-pound trip limit is too restrictive. A 400-pound trip limit still needs to be increased. If we keep going back and using the wrong data, then this whole management action is misguided.
- **Tony DiLernia (Council member - NY):** Helping to clarify Tim's concerns - While many fish were caught in a recreational manner and were allocated to the rec community, many were shipped into the commercial market. With that in mind, 3a-2 gets an increase, but NJ gets a decrease. I cannot support this because it decreases NJ's allocation. This also happens for 3a-3. Therefore, I would support 3a-4 because it supports both NY and NJ (slight loss).
- **Tom Fuda (Recreational - CT):** State-to state transfers will still occur, correct? Then, select an option that uses more recent data. I have no strong preference because I am a recreational guy.
- **TJ Karbowski (For-Hire - CT):** We need to ensure the recreational sector does not end up with a smaller bag limit.
- **Dan Farnham Jr. (Silver Dollar Seafood Inc., Commercial - NY):** These alternatives are quite convoluted. However, I support a minimum default allocation for states. In support of 0.1%, because it is the current minimum for other states. The reason I did not want to base com/rec allocation on an updated time series was because of the unrestricted angler phenomenon. But when it comes to commercial allocation, this is not an issue because we are not discussing recreational accountability. I'm in support of the hybrid approach 3a-4 which gives weight to recent landings trends while also respecting historical landings and allocation.
- **James Fletcher (United National Fisherman's Association, Commercial - NC):** This does not address the conditions in NC with the problem of the inlet where sometimes commercial vessels have to land fish in VA. The organization I represent used to have 237 vessels, and all but 18 gave up their permits to NY. I'm dumbfounded why every species we are managing benefits NY; NY will not accept what they turned in on their records and NY does not trust their own data. I'm also frustrated that we are calling MRIP best scientific information available. All in all, agencies have not done their job.

### Rebuilding Plan

- **John DePersenaire (Recreational Fishing Alliance - NJ):** Fishing mortality has a diminishing return on SSB. I assume that environmental factors are at play. Why do we not have 10-year plan? What happens if we do not make adequate progress towards rebuilding?
- **TJ Karbowski (For-Hire - CT):** These rebuilding plans use MRIP numbers and thus are not useable. I 100% agree with this chart in terms of what happened in 2014. The ecosystem in Long Island Sound “died” during this time. There was nothing going on in the spring (maybe road salt added to the problem). This was the same time Omega Protein got kicked out of NC.
- **Mike Plaia (Commercial/Recreational - CT/RI):** I support 4b because it gets us there quickly, but most importantly, within 10 years.
- **Tom Fuda (Recreational - CT):** What we are talking about is doubling the SSB (in regards to rebuilding to the target). How achievable is that? Menhaden are managed using ecological reference points and ecosystem-based management. The striped bass population is considered part of this process. How does this factor in Bluefish? I prefer 4d, the 7-year plan. I do not think the 4-year plan is good because it will keep catch low for 4 years and then greatly increase the limits, which will be an issue. I prefer a more gradual approach where catch is allowed to increase gradually as the stock rebuilds.
- **James Fletcher (United National Fisherman’s Association, Commercial - NC):** What we miss by not including data prior to 1984 is the understanding that Russian’s were fishing dogfish, which allowed bluefish to reach a high population level. We are not managing any fishery right because of one predator. Is NMFS supporting the dogfish population to throw off management for all other species?

#### Sector Transfers

- **Mike Plaia (Commercial/Recreational - CT/RI):** Would these transfers occur during the rebuilding plan? I prefer status quo for both sets (5a-1 and 5b-1).
- **Tom Fuda (Recreational - CT):** 5a-2 because it would prevent transfers when the stock is overfished. I prefer 5b-1 for the transfer cap.
- **John DePersenaire (Recreational Fishing Alliance – NJ):** 5a-2 makes sense from an equity standpoint. But I am opposed to transfers until we can get to reasonable regulations on the recreational side. The recreational regulations are too restrictive right now and transfers should not occur until they are fixed.

#### Management Uncertainty

- **TJ Karbowski (For-Hire - CT):** Does management uncertainty account for MRIP uncertainty? Having management uncertainty for MRIP needs to be included in management. New MRIP has to be factored into the decision.
- **Mike Plaia (Commercial/Recreational CT/RI):** I prefer 6b.
- **Tom Fuda (Recreational - CT):** I prefer 6b.

#### De Minimis

- **Tom Fuda (Recreational - CT):** I am in favor of 7e because it implements consistent regulations coastwide.

## Other

- **TJ Karbowski (For-Hire - CT):** As an example, MRIP has us taking thousands of fish from shore, where there are no fish up here. For BSB they have us (CT) taking a ton of fish during the winter when no one is fishing. We have sat here for 2 hours, we have heard that commercial sector is not catching the fish, recreational sector is not catching fish, I conclude that we have a YOY survival rate problem. We need to focus on the root issue, which is the survival rate of bluefish, not the issues addressed here today.
- **James Fletcher (United National Fisherman’s Association, Commercial - NC):** Maybe we need to look at our science differently. Can we pull regulations from bluefish entirely? See if the fishery manages ok on its own. I don’t know of any fishery that has been fished to extinction.

## **2.4 MAINE, NEW HAMPSHIRE, MASSACHUSETTS, AND RHODE ISLAND**

Thursday, April 1, 2021, 6:00 p.m.

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**Attendees: (46 excluding Council/Commission staff):** Mike Andresino, Chris Batsavage, Owen Baute, Gerald Belastock, Rick Bellavance, Alan Bianchi, Kali Boghdan, Paul Caruso, Jack Creighton, James Cullen, Mike DeAnzeris, Michelle Duval, Dave Eisner, Peter Fallon, Dan Farnham, Jay Farris, Cynthia Ferrio, Kimberly Fine, Corey Gammill, Steven Grust, David Gullette, Dewey Hemilright, Raymond Kane, John LaFountain, Nicole Lengyel Costa, John Manteiga, Parker Mauck, Joe Mckenna, Nichola Meserve, Ethan Minichiello, David Monti, Anthony Nascimento, Dale Newton, William Nicholson, Cheri Patterson, Michael Pierdinock, Will Poston, Kermit Robinson, Sarah Schumann, Eric Summers, Lou Tirado, Sam Truesdell, Megan Ware, Anna Webb, Katie Perry, Keith Yocum

**Summary:** The meeting started with an introduction and briefing from the hearing officer Nicole Lengyel (RI). In total, eight members of the public offered comments on the amendment alternative sets. Several comments were made in regard to the FMP goals and objectives, but two reoccurring themes stood out. Two individuals said that “fair and equitable” should be better defined. Additionally, two individuals thought it important that the catch and release aspect of the recreational fishery be recognized. On the subject of the commercial/recreational allocation, three people supported alternative 2a-2, two people supported status quo, and one person supported 2a-3. Four individuals supported updating the state commercial allocations to alternative 3a-2. The three attendees who provided input on a preferred rebuilding alternative agreed that the stock should be rebuilt as quickly as possible and as such, supported alternative 4b. In regard to transfers, three people said that sector transfers should not be continued, but one individual supported the status quo transfer process, and another thought the transfer cap should be updated (5b-2). Lastly, one individual voiced support for sector specific management uncertainty and *de minimis* alternative 7e.

Staff received a lot of technical questions on the amendment, a few of the reoccurring and more substantive questions are included below. A few people asked how the commercial and recreational allocations were calculated and what data was used. Two individuals asked why there was no alternative that used the same base years with new MRIP data. Staff also received questions on the rebuilding plans including: why a ten year option was not included; if rebuilding to the target was considered realistic; and why the stock was considered overfished.

### **Comments:**

#### FMP Goals and Objectives



- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** Overall, the amendment is a reset due to MRIP, more so than a reallocation. Like striped bass, we need to look at the value of the fish left in the water. The availability of fish is what drives the demand. This is largely a catch and release fishery. The value of bluefish to the recreational community is very high; bait and tackle shops, fuel, charter trips, generate a lot of economic activity. The commercial value is quite low. We support catch data over landings data. We support goals and objectives that recognize keeping this value of fish in the water as the highest economic concern. This is a key component of considering economic and social needs of all groups as is described in objective 2.2.
- **Rick Bellavance (Priority Charters, For-Hire/Commercial – RI):** The proposed goals are much better than the existing goals, and strongly recommends that the Commission and Council consider updating the FMP. In particular goal 2 is extremely important. However, “fair and equitable” is quite subjective, so if we can further define those terms it would improve the overall message. Goal 2 addresses the fact that many stakeholders utilize the bluefish resource. These goals support all stakeholders, regardless of whether you want to eat bluefish, harvest them yourself, or catch and release them.
- **Owen Baute (Recreational – RI):** How do you define stakeholder engagement? How do you plan to achieve that?
- **Mike Pierdinock (For-Hire - MA):** I would like to recommend that “equitable access to all user groups” be defined. At times, bluefish are used as bait, food, and catch-and-release and we want all user groups represented.

#### Commercial/Recreational Allocation

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** Can you explain the difference between how catch vs landings data is allocated? In regard to the allocations, I would like to see catch data used so each fishery has their own sector specific discards. I support 2a-2 or 2a-3 because these alternatives use catch data and are based on more recent years, but I would like to see what the status quo option with updated MRIP estimates looks like. In regard to the phase-in, we support 2b-2.
- **John LaFountain (Fox Seafood Inc., Commercial – RI):** Why are there no alternatives higher than 17% for the commercial sector? Considering how low the other commercial allocations are, I support status quo. I am surprised there is not an option with a higher allocation for the commercial sector. We also feel that the MRIP data is highly inflated, and the fish are not coming as close to shore where the recreational guys are. The commercial fishery is quite healthy but has been restricted by a low quota. Bluefish is a food source that should be enjoyed by the public. This is a fishery which can be harvested by smaller boats which supports local fishermen. Small-scale commercial fishing operations rely on bluefish, and they have made investments that depend on access to the resource, we cannot decrease their access. Also, when I hear reports that recreational anglers are unable to catch three fish, I question the validity of MRIP data and think the estimates are inflated. Bluefish are migrating through, but they are staying offshore.
- **Mike Pierdinock (For-Hire – MA):** How did you come up with the phase-in time periods and why is there no 10-year option?

- **Rick Bellavance (Priority Charters, Recreational/Commercial – RI):** Why isn't there an alternative that uses the original base years with new MRIP information? I support using the catch-based approaches that you have proposed.
- **Eric Summers (Recreational - MA):** I support 2a-2 to increase the recreational allocation to 89%.
- **Mike DeAnzeris (Commercial – MA):** I support the comments proposed by John LaFountain. Status quo because the fish are most valuable to the smaller boats that bring catch to the local markets. The fishery is well suited to day-boat catch. Make sure the quota is accessible in a proper manner, so fresh fish can be distributed quickly. Bluefish should be caught and marketed within a day or so to economically benefit local communities.
- **Steven Grust (Recreational – NJ):** I support 2a-2 but I am concerned that there is not a minimum size limit to help conserve the stock. Many people harvest small bluefish for bait and that definitely affects the health of the stock.

#### Commercial Allocations to the States

- **John LaFountain (Fox Seafood Inc., Commercial – RI):** I support 3a-2 because 5 years is a long enough period to know what the current trends in abundance are. In Rhode Island there are plenty of bluefish, and other states are not harvesting them. These fish seem to not spend much too time down south. The proposed goals and objectives support economic efficiency and fair access for fishermen. Rhode Island needs a larger quota so that their fishery isn't closed in the fall when the run of bluefish occurs.
- **Steven Grust (Recreational – NJ):** I support 3a-2. A 5-year time series is long enough to pick up on the migration patterns of bluefish. In NJ it's rare to see more than 3 fish caught a day.
- **Rick Bellavance (Priority Charters, Recreational/Commercial – RI):** The 5-year average is the smart way to go (3a-2). I also support a minimum default allocation to convert discards to landings (3d-3). I support a phase-in because some of the changes are significant.
- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** I support 3a-2 and a minimum default allocation (3d-3). The trigger approach is too complex. For phase-in, we support 3b-2 which phases in reallocation evenly over the duration of the rebuilding plan.
- **Eric Summers (Recreational – MA):** I support 3a-2 and 3d-2

#### Rebuilding Plan

- **Eric Summers (Recreational – MA):** Is the target a real value? We have never been at the target since 1985. Is there something being done differently this time that will make it more likely that biomass will hit the target? I recommend we be cautious; the target may not be too high, the threshold could be too low. I support 4b to have the stock be rebuilt as soon as possible. Maybe make the threshold 75% of the target instead of 50%.
- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** I support 4b as it rebuilds the stock quickest. The other options are remarkably unpleasant, with a lower chance of success.
- **Mike Pierdinock (For-Hire – MA):** He remembers back in 1980s when bluefish were abundant, and this is not the same fishery today. Is the reduction in estimates of biomass due to the fact that less people are targeting bluefish because they have moved offshore?

- **Rick Bellavance (Priority Charters, Recreational/Commercial – RI):** Spawning stock biomass and recruitment looks to be fairly stable. I think the Council’s risk policy has been vetted and is the appropriate alternative (4c). This alternative will get the job done, but won’t overly burden the fisheries.
- **Steven Grust (Recreational – NJ):** Does the biomass graph account for unreported caught fish?
- **John LaFountain (Fox Seafood Inc., Commercial – RI):** We support 4b, along with many of the fishermen I have spoken to.

#### Sector Transfers

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** Earlier I pointed to the value of the catch and release aspect of the fishery. We feel the quota transfer provision is not reflective of the 65% of folks who practice catch and release in the fishery. Why practice catch and release if the unused quota is going to be transferred. The idea of catch release is to practice conservation in safe release practices so that there are fish tomorrow to catch. There is no benefit to the fishery if we transfer the fish and do not help them grow. We feel strongly that there should be no transfer at all in either direction. Given there are no options to that affect we support 5b-1 status quo in regard to the transfer cap.
- **Steven Grust (Recreational – NJ):** I support 5b-2.
- **John LaFountain (Fox Seafood Inc., Commercial – RI):** I support 5a-1 which will continue to allow quota going from the recreational to the commercial sector. It is important to support the commercial fishermen at the end of the season when the transfers typically occur.
- **Eric Summers (Recreational – MA):** I support no transfers.
- **Owen Baute (Recreational – RI):** I support no transfers. Catch and release is only worth it when the fish are going to stay there.

#### Management Uncertainty & De Minimis

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** We support 6b, the post-sector split. Seems to be the fairest alternative.

#### De Minimis

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** We support 7e, the 2020 management measures.

## 2.5 NEW JERSEY

Thursday, April 8, 2021, 6:00 p.m.

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**Attendees: (37 excluding Council/Commission staff):** Steven Avakian, Chris Batsavage, Bill Blanke, Bonnie Brady, Jeffrey Brust, Tony Campagna, Michael Celestino, Douglas Chase, Joe Cimino, Heather Corbett, John Dwyer, Jessica Daher, John DePersenaire, Michelle Duval, Cynthia Ferrio, Frank Florio, Thomas Fote, Paul Haertel, Ross Hartley, Stephen Hydock, Bob Keller, Tom Little, Wayne Maloney, Reel MaxLife, Steven Morey, Adam Nowalsky, Will Poston, Michael Purvin, Andrew Rigby, Lenny Rodriguez, Mark Taylor, John Toth, Mike Waine, Kevin Wark, Thomas Wayne, Harvey Yenkinson, Douglas Zemeckis,

**Summary:** The meeting started with an introduction and briefing from the hearing officer Joe Cimino. In total, six individuals offered comments on the amendment. Very few comments received at this hearing were in support of a specific alternative. The majority of the meeting was geared towards answering questions on the amendment and several suggestions were made that fall outside of the current range of alternatives.

Individuals offered several recommendations for the FMP goals and objectives including greater consideration of the following: the consumer user group; environmental stressors; the importance of forage fish; and differences in regional abundance. When asked about the commercial/recreational allocation alternatives, one individual voiced support for alternative 2a-1. No comments were provided on the state commercial allocations, but two commercial stakeholders said they thought the alternatives were too complex and expressed a preference to discuss the matter later offline with staff. On the subject of the rebuilding plan, three people thought that the stock is responding to environmental and ecological cues and that fishing mortality is not the cause for the stock's decline. Four people were in strong support of a ten-year rebuilding plan to give the stock adequate time to rebuild. In regard to the sector transfers, one person shared that they were never in support of this process and a second person said that they would prefer that no transfers occur until the recreational sector has a higher bag limit. Lastly, one person commented in support of sector specific management uncertainty (6b) and flexible recreational measures for *de minimis* states (7b).

Attendees asked several clarifying questions, a few of which are highlighted below. One person stated that prior to final action, the public will need clarification from NOAA Fisheries on what actually happens if adequate progress is not achieved during rebuilding. Another person asked about when transfers are allowed during the rebuilding plan. Staff explained that the newly proposed transfer process (5a-2), which would allow transfers during rebuilding so long as the stock was above the overfished threshold and overfishing is not occurring. Lastly, one person asked if a ten-year rebuilding plan could even be implemented if it was previously removed from the alternative set, to which a NJ commissioner responded that nothing is completely off the table until after final action.

### Comments

#### FMP Goals and Objectives

- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** I see that the FMP goals and objectives reference fair and equitable access to user groups along the coast, but what about consumers?
- **Kevin Wark (Viking Village, Commercial - NJ):** Bluefish are suffering from great environmental issues. I have watched this my entire life. Moving up and offshore and they have

now dwindled to a small population. I feel a lot of this work is in vain. Until we can learn why recruitment is low, we are going to struggle. I think the objectives need to be more focused on the stressors in the environment that caused changes in the fishery. Why are bluefish swimming at 100 fathoms when they used to be just a few miles off the beach? Collectively, we need to open our eyes and look at what is happening in the environment. I don't believe this is an overfishing issue. These fish used to look like schools of menhaden.

- **Tom Fote (Board Member - NJ):** In 1989 we put a 10 fish bag limit in it was not due to stock status. A few years later the stock declined, but it was due to sand eel populations declining. In the 1960s through the 1980s bluefish were feeding heavily on sand eels. In the 1990s bluefish were no longer looking healthy and well fed because of warming waters and less bait. The fish go further offshore to be in colder waters. We know these issues are environmental and bluefish have gone through these cycles. We are at about the 75-year average population. Now, we changed the limits again and its due to stock status. I see that we are going to put a lot of commercial and recreational fishermen through unnecessary suffering, because we know that the stock depends on forage species, and forage species are moving because the water is warm.
- **John Toth (Jersey Coast Anglers Association):** Sand mining has destroyed habitat on the inshore waters. When you lose habitat, it is less attractive for all species. We are dealing with climate change here and also had hurricane Sandy destroy much of the inshore environment. This is one of the major reasons we are not seeing bluefish in our waters.
- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** On the eastern end of Long Island there has been some of the largest bluefish and most abundant schools we have seen in years. I know water temperature plays a role, but our experience has not been the same as the previous commentors.

#### Commercial/Recreational Allocation

- **John DePersenaire (Recreational Fishing Alliance - NJ):** Can you show a time series of recreational landings relative to the RHL?
- **Mike Waine (American Sportfishing Association - NC):** Do recreational landings include dead discards? Does the document have discard information within it?
- **Kevin Wark (Viking Village, Commercial - NJ):** I represent Viking Village, we have 34 vessels and we were huge bluefish producers for many years, until we saw bluefish shift to the east. The epicenter of bluefish fishing has been moving northward over the years. However, if the fish return, we want to be able to fish for them. We are looking for opportunities to continue fishing in the Mid-Atlantic and keeping the infrastructure alive. I am just curious of what the historical percentages are to ensure we have opportunities moving forward. It costs a lot of money to keep the doors open. I support 2a-1. This is all about opportunity for these vessels if the fish present themselves.
- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** Can you explain why the percentages change when we are using catch data?
- **Mike Waine (American Sportfishing Association - NC):** This bluefish fishery is absolutely different from the summer flounder, scup, and black sea bass fisheries in that catch-and-release fishing is a large component of the bluefish fishery.

## Commercial Allocations to the States

- **Bonnie Brady (Long Island Commercial Fishermen’s Association – NY):** This is a very complicated set of alternatives. Would it be possible to talk offline to better understand the management implications?
- **Kevin Wark (Viking Village, Commercial - NJ):** I agree with Bonnie. This is too confusing for me to make any comment right now. We need to know what this truly means for individual states especially when I am representing the commercial sector.

## Rebuilding Plan

- **John DePersenaire (Recreational Fishing Alliance – NJ):** I previously asked about the absence of a 10-year rebuilding plan option. It was explained that the MSA requires that the stock be rebuilt as soon as possible, and it was determined that the 10-year option was not appropriate. I do think that this is a significant concern from our standpoint. This stock is responding more to environmental and ecological cues as opposed to directed fishing mortality. By not having the 10-year option, we are setting managers up for failure. We are putting the burden of unnecessary pain on the fishermen. Section 304e in MSA allows for going up to 10 years. I really think that the 10-year option should be included. I also think the SSB rebuilding target is actually unattainable knowing that we have never been at that level before.
- **Mike Waine (American Sportfishing Association - NC):** The public hearing document states “if adequate progress is not made through the rebuilding plan, the regional office will immediately make revisions necessary to achieve adequate progress. NOAA Fisheries technical guidance on MSA National Standard 1 recommends that in these situations the rebuilding fishing mortality proxy (F) be set at 75% of the target F. This means that if the selected rebuilding plan is demonstrating difficulty in achieving the target on time, F may be further decreased to achieve a rebuilt stock.” Am I understanding correctly that if we do not rebuild on pace with the plan that we start lowering our target fishing mortality rate to 75% of the target to speed rebuilding? If this is the guidance, but we don’t know for sure if that is what gets implemented, then that leaves quite a bit of uncertainty for the stakeholders. I continue to maintain that this is going to be a really frustrating moment if we are wrong about this ambitious timeline and MSA NS1 says we need to further constrain. There are many factors aside from fishing mortality that impact rebuilding. Prior to final action we will need clarification from NOAA Fisheries on what actually happens if we do not achieve adequate progress towards rebuilding.
- **Bonnie Brady (Long Island Commercial Fishermen’s Association, NY):** There has to be a 10-year option. Midway through the rebuilding plan if new stock assessment information is made available and the research surveys are unable to catch bluefish, the quotas will be dropped and both fleets will be heavily restricted. Winter flounder was an interesting situation. In 2010 the NEFMC put a moratorium on winter flounder in southern New England because the trawl survey was unable to catch the fish and the assessment showed that there were no fish. The problem was that the net was about 6 inches off of the bottom and unable to catch flat fish. I highly recommend as a failsafe to have the ten-year option in the plan. If regionally there is an issue – tides, temperature, forage, EFH – the only people that are going to pay for it are the fishermen and you have to have the 10-year option as a buffer just in case.

- **John Toth (Jersey Coast Anglers Association):** The ten-year approach is the way to go. Right now, we are constrained to 3 fish. How much more can we do to help the stock? This is not a result of fishing mortality; this is an environmental issue and beyond our control. The last thing we need to do is to see the for-hire fleet go out of business. They are already struggling with low bag limits and the pandemic. Whatever we can do to help the for-hire fleet would be much appreciated.
- **Kevin Wark (Viking Village, Commercial - NJ):** Everyone on the call has been spot on. Bluefish are the next weakfish, where the bag limit is down to one and the species can't get a foothold back into the environment. We also used to have winter flounder in New Jersey and that fishery is almost nonexistent now. This adds to the long list of species we have lost. We need to be mindful of our infrastructure and provide the opportunities we can. We do not want our goals to be too high. I think bluefish are not going to be able to rebuild. We used to see them spawning inshore in the spring and summer and now we don't see that anymore in the Mid-Atlantic. This is the next grey trout – where nobody can pinpoint what happened. All the comments we have heard tonight are very good and accurate.
- **Mike Waine (American Sportfishing Association - NC):** When the Council and ASMFC developed this draft amendment, we asked them to keep the 10-year alternative in place. They removed it and we now can no longer have it added back in because it is outside of the current range of alternatives. Is that correct?
- **Tom Fote (Board Member, NJ):** Nothing is ever completely off the table. I have seen weirder things happen before. The real problem is looking at the public hearing attendance numbers. The small number of stakeholders do not represent the entire community. We used to have hearings with 100s of people. People are webinar-ed out. We are not getting enough public input.
- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** I agree with Tom and think there is a fair amount of burnout from all the meetings we have had. If there was a way to add a few more types of public hearings, that could be very beneficial. I think people need a break and it has pretty much been non-stop for weeks. It would be helpful to ask Bob and Chris to see if additional hearings could be scheduled.

### Sector Transfers

- **John DePersenaire (Recreational Fishing Alliance – NJ):** The recreational sector needs reasonable bag limits to entice people to pursue bluefish. We need that incentive. I would surmise that directed trips are down, just because of their change in distribution. Bluefish are very far offshore, and less people are targeting them. In fact, many of the bluefish fishing tournaments that would usually happen during the springtime in New Jersey have shut down. I have a hard time supporting transfers to the commercial sector until reasonable bag limits are restored. I am not opposed to transfers to the commercial side in general, just not until reasonable recreational measures are restored that incentive people to go on a head boat or steam 20 miles offshore to catch them.
- **Kevin Wark (Viking Village, Commercial - NJ):** I spoke against this quota transfer so many years ago when it was first implemented because I knew the day would come that it would no longer be feasible. We can't expect the recreational sector to transfer fish to the commercial sector. Many years ago, I spoke against this system where unused fish would be transferred

away. Back then, accounting was not very accurate for either sector, which made transfers an even bigger problem in his view. This was never a good system and I hope we have all learned from this. Transfers hasn't been a huge issue lately because the commercial sector hasn't been landing all their quota but moving forward, I do not see it likely that the recreational sector would transfer over fish. I do not see transfers working as an option moving forward.

- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** When are transfers allowed and not allowed in regards to stock status and the rebuilding plan?

#### Management Uncertainty

- **John DePersenaire (Recreational Fishing Alliance – NJ):** We would support 6b. This position is consistent with the position we have taken for the recent summer flounder, scup, and black sea bass allocation amendment. There is value added to the catch-and-release component of the bluefish fishery. I think it is best to not share uncertainties across sectors. We need to revisit how we estimate average weight of discarded fish.
- **Mike Waine (American Sportfishing Association - NC):** It seems that switching to sector specific management uncertainty will just penalize the recreational sector for uncertainty associated MRIP estimates. The recreational reform initiative has been working to develop tools to better use MRIP data and for management to account for its inherent uncertainty. There is an effort to potentially base recreational measures on stock status. I wanted to provide greater context around this issue when these decisions are being made.

#### De Minimis

- **John DePersenaire (Recreational Fishing Alliance – NJ):** We would support 7b. I really do not think the impacts of fishing in a de minimis state are going to have any measurable impacts on the stock during rebuilding. Let those states take full advantage of any bluefish. In the broader scheme of things, de minimis states will have a very small impact.



## 3 WRITTEN COMMENTS

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### 3.1 ONLINE COMMENT FORM

Steven Schnebly

**Email**

[smddfsh@gmail.com](mailto:smddfsh@gmail.com)

**1. FMP Goals and Objectives**

Weakfish, flounder, fluke, striped bass, kingfish, blowfish, cod, mackeral. All a fraction of what they once were.

What do you guys do again?

**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

**Date Submitted**

02/20/2021

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George Horvath

**Email**

[georgerhorvath@yahoo.com](mailto:georgerhorvath@yahoo.com)

**8. General Comments**

I tagged 2,397 bluefish in NJ with American Littoral Society spaghetti tags. 29 were recaptured from the Cape Cod Canal to Atlantic Beach, NC. Last year I tagged 89 bluefish in Manasquan Inlet, and one was recaptured in the Point Pleasant Canal.

**Upload File**

[425426b05c384ba4971ad10abb036975.jpeg](#)

**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

**Date Submitted**

02/22/2021

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Aaron Uehara

**Email**

[aaron.uehara@gmail.com](mailto:aaron.uehara@gmail.com)

**8. General Comments**

Blue fish are disappearing. Drop the commercial quotas, populations are not what they were 20 years ago. You need to give them a chance to recover.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

02/23/2021

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David Walt

**Email**

[dwalt@bwh.harvard.edu](mailto:dwalt@bwh.harvard.edu)

**1. FMP Goals and Objectives**

Something drastic needs to be done. I am a recreational fisherman on Cape Ann. I haven't caught a bluefish in two years.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

02/23/2021

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Alan Anderson

**Email**

[alanblackpowderstuffer@gmail.com](mailto:alanblackpowderstuffer@gmail.com)

**1. FMP Goals and Objectives**

I believe that commercial fishing quotas on Striped Bass and Bluefish should be halved, or even a 2 year ban on commercial fishing for these species, to allow stocks to rebuild. As a recreational fisherman. I have not seen a bluefish, or caught a striped bass for many years, i believe, due to commercial over-harvesting by commercial fishers.

**Primary state(s) you land bluefish in:**

Massachusetts

**Date Submitted**

02/24/2021

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Michael Toole

**Email**

[toolemf@hotmail.com](mailto:toolemf@hotmail.com)

**1. FMP Goals and Objectives**

Objective 1.1 should clearly state maintain catch below Acceptable Biological Catch rather than "rate of fishing mortality".

Objective 2.2. should be deleted. This is commonly used as an excuse for not taking needed actions for the best protection of the fish. While this is something I think should play in the allocation of catch between user groups but not for weakening needed restrictions on catch numbers. Example being giving party/charter 5 fish limit verse others 3 fish. Both should have been 3.

**2. Sector (Commercial/Recreational) Allocations**

Support 2a-2 89% Rec, 11% Commercial. I support this because I believe both the economic and social value of bluefish are much greater in recreational fishing.

Support 2b-1 No phase-in. I support this because with the current status of the bluefish stock this change should be immediate.

**3. Commercial Allocations to the States**

Support 3a-4 Half 1981-1989 and half 2009-2018. I support this because it recognizes historic landing before the stock level dropped so low that states like NH and Maine have seen very few bluefish while also recognizing we will not reach the level seen in the 80s.

Support 3b-2 allocation change spread evenly over same duration as rebuild plan. I support this sine no reason to increase allocations to states that have limited access to them until stock is rebuilt.

**4. Rebuilding Plan**

Support 4b Constant harvest - 4-year rebuild plan. I support this because I think it is the most likely to succeed in rebuilding the stock with less risk. Since the stock is already over fished more drastic action is required.

**5. Transfers**

No transfer until stock levels reach target level, than 5a and 5b.

**6. Management Uncertainty**

Support 6b Post-sector split. Allows addressing differences between commercial and recreational fishing uncertainty.

**7. De Minimis Provisions**

Support 7c Recreational De Minimis - state selected management measures. I support this because it allows states to develop regulations that fit their need while maintaining less than 1% harvest threshold.

**8. General Comments**

For the recreational catch there should be no differences between for hire industry and individual recreational fishing limits.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

New Hampshire, Massachusetts, Rhode Island, New Jersey

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

02/24/2021

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MATTHEW QUAIL

**Email**

[matthewquail@gmail.com](mailto:matthewquail@gmail.com)

**1. FMP Goals and Objectives**

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

**2. Sector (Commercial/Recreational) Allocations**

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

**4. Rebuilding Plan**

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

**6. Management Uncertainty**

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

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Forwarding this to hopefully influence any decisions on bluefish catch limits

**8. General Comments**

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/03/2021

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Dean Pesante

**Email**

[dpesante@cox.net](mailto:dpesante@cox.net)

**1. FMP Goals and Objectives**

The Bluefish stocks/fishery are very healthy here in Rhode Island. It is our primary fishery. Many fisherman and related businesses rely on it. We could not stay in business without it. Which ever management plan will allow us to continue making a living and provide for our families is the plan we would support.

**2. Sector (Commercial/Recreational) Allocations**

We support 2a-1: 83% Rec, !7% Comm (status quo)

We 2b-1: No phase in (status quo) from these alternatives.

We would like to see it return to 75% Rec, 25% Comm. as in past years. Not sure how they came up with the %/numbers given the fact that all recreational landings are voluntary and can be easily inflated and inaccurate.

**3. Commercial Allocations to the States**

We support Alt. 3a-2: 5 year (2014-2018) This reflects the most current trend/data. 2019 and 2020 would also support this.

We support 3b-1: No phase in (status quo) Our fishery is healthy here in Rhode Island. We can't afford any reductions.

We support 3c-1 No Trigger (status quo)

WE support 3d-2 0.10% Minimum Default Allocation

**4. Rebuilding Plan**

We support 4b Constant harvest - 4 year rebuilding plan

**5. Transfers**

We support 5a-1 No Action/Status QUO

We support 5b-1 No Action/Status Quo

**6. Management Uncertainty**

We support 6b Post-Sector Split

**7. De Minimis Provisions**

We support 7d Recreational De Minimis-rollover management measures

**8. General Comments**

The Bluefish stocks and fishery in Rhode Island is healthy. We have always had an abundance of Bluefish in our waters and this is still true at the present time.

I'm not sure why Bluefish landings have dropped off in the states to the south. Possibly water temperature or water quality do to run off from rivers and estuaries with fertilizers, pesticides and other pollutants. Also Beach Renovation (dredging) are all possibilities that may keep Bluefish away. Possibly further offshore waters.

I hope the appropriate changes can be made to reflect the CURRENT Bluefish trends when managing this resource and accommodate those who rely on this fishery. Than you.

Respectfully, Dean Pesante F/V Oceana

### 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

### Date Submitted

03/05/2021

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Corey Gammill

### Email

[cmgammill@gmail.com](mailto:cmgammill@gmail.com)

### 1. FMP Goals and Objectives

I like the proposed goals to the FMP. The question I have, and this will be a theme of this document is how can ASMFC and NMFS stay with their finger on the pulse of what is happening.

The goal is simple: a fishery that is sustainable and enjoyed by ALL user groups.

I just think it is VERY important for regulators to understand why they failed in managing the fishery? The goals originally are good goals as well, but the bluefish bag limit was 10 fish per person for days for a VERY long time and no changes were made and not enough questions asked about whether measurement was correct?

### 2. Sector (Commercial/Recreational) Allocations

Bluefish and Striped Bass are the two key fish for the recreational fishery from Florida to Maine. These two fish get people on the water, using their boats, using fuel, buying bait, buying fishing gear. While I am incredibly supportive of commercial fishermen, Bluefish have very little value in price per pound and have much more value to recreational fishermen and the businesses that support them. I vote 2a-2

### 3. Commercial Allocations to the States

Status quo or 3a-4...

3b-2

3c-1

3D-3

### 4. Rebuilding Plan

4B: For starters, I am very skeptical that the changes in bag limit alone in 2020 will lower the catch rate by 2/3rds. I don't know anyone who keeps 3 fish, so I don't see how lowering the bag limit will make a difference, but we will see. I wish the council had created a minimum size and had restricted treble hooks. I also wish the council would manage the fishery recognizing that the more bait we have the more fish we will have. This was seen clearly in the summer of 2020. This was the best bluefishing we have seen for LARGE fish and it is no coincidence that the commercial fishermen were not fishing for squid as there was no market.

The real cause of less bluefish in coastal waters is less bait and the fish we have have, have gotten smaller because most of the big bait is sitting offshore with the bigger bluefish. So what this means is the smaller fish come in and these are the bluefish that are targeted.

If you look at catch data over the last 5 years bluefish harvest size has gotten smaller as less big fish exist. It has been proven that the smaller the bluefish the higher the release mortality rate is. So the irony is that as we let our fishery fall apart we are only hurting it more because the release mortality rate increases.

How can we solve all this?

- 1) Minimum sizes. Let the fish grow and have a chance to reproduce. No one should keep a fish smaller than 3 pounds.
- 2) Adjust gear types: no treble hooks and no J hooks with bait.... Any sign of blood severely decreases a fishes chance of survival and both lead to more gut/gill hooks and multiple hooks.
- 3) Have closures to commercial bait fishermen when Migratory fish are present. For instance off Nantucket in the summer limit the squid fishermen and you will see the big fish inshore, reproducing inshore. \*\*\* I am sure this is true up and down the coastline...

LASTLY, the reason I think we should do 4B is that if we can rebuild the fishery slowly or quickly, why wouldn't we do it quickly? At least if we do it quickly we can see what is working and not, where if we take our time, it will take us longer to assess results, potentially pushing our fishery further into decline.

## **5. Transfers**

No ACTION: Statust quo....

We do not currently collect data well enough to know what is happening right now with a fishery, so how can we expect to make educated decisions about Data Transfer if we don't have real time data? If we had more accurate data, I would say absolutely, but without it we would be making decisions on information from 1.5 years ago...

## **6. Management Uncertainty**

While every part of me wants 6B, because I do think that the two should be separated as data is much easier gathered from the commercial fishermen than the recreational. If there is uncertainty about the recreational side, the commercial fishermen should not be penalized while regulators dig into where the issue is, and visa versa

This said, if uncertainty is HURTING the WHOLE FISHERY, decision makers need to act a lot more aggressively than they have in the past. It is easier to open a fishery than to rebuild it right? It is amazing how conservative ASMFC is being towards rebuilding the fishery. I think that any sign of overfishing should lead to aggressive management and rule changes.

So my vote would be 6A

## **7. De Minimis Provisions**

No comment

## **8. General Comments**

Below I am including a public comment submitted in 2020.

I want it noted again that I do not think the regulation changes in 2020 were strong enough to make a change in our fishery.

We need to do more than adjust the bag limit to make a difference in rebuilding the stock.

I also think that ASMFC and NMFC need to seriously consider ways to reduce the release mortality rate. In the study used to come up with the assumed 15% rate it is made VERY CLEAR that the presence of blood decreases the likelihood of survival by 9-11 times. If we could lower poor hookings this would make a monumental difference in survival rate of fish and lower the 15% assumed rate significantly. I firmly believe that eliminating treble hooks are a key to reducing this mortality rate and I highly suggest the council start a study to see if this is the case.

It is also very clear that the larger the fish targeted, the less likely that they will die. So with this information why is the ASMFC and NMFC encouraging targeting of small fish with no minimum size. Minimum size should be required.

Lastly, ASMFC should be looking at the vertical nature of an eco system. 2020 was the best blue fishing that Nantucket has seen in the last 5 years for large fish. This was NOT because of a smaller bag limit started in April 2020, but because of a lack of Squid boats south of Nantucket and the Vineyard. Limiting pressure on bait, led to more herring and squid in our waters, which brought back the LARGE bluefish. So a question that should be asked is WHETHER RECREATIONAL BLUEFISH ARE MORE VALUABLE THAN COMMERCIAL SQUID THIS IS KEY!!!!

WE HAVE DATA THAT SHOWS THAT MORE BAIT = MORE FISH. SO WHY CAN'T WE MANAGE FISHERIES AT THE SAME TIME? If the squid boats were moved 12 miles off and the bait had a chance to get in, than the commercial fishermen would still catch their squid, albeit with a bit more effort, but a recreational fishery for 3 months around Nantucket, Martha's Vineyard and Cape Cod would be brought back. if this model were followed up and down the coast and comparisons made between bait fisheries and fin fish fisheries, I think ASMFC would find some different answers to how the bait fisheries should be managed.

## **Upload File**

[bluefishcomment2021.docx](#)



**How would you describe your primary role in the fishery?**

Recreational (for-hire)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/08/2021

Jeff Norton

**Email**

[jeffnrtn@yahoo.com](mailto:jeffnrtn@yahoo.com)

**1. FMP Goals and Objectives**

Make all NE states have the same regulations for all fish. For blues make it 1 fish per day per angler. Not sure what the size should be or if a slot limit works for blue fish. 10 per day was way too many and even 3 is too many. Thank you.

Haven't seen a striper public comment box like this but they should shut it down altogether for a couple seasons. OR ban commercial fishing and fishing in the cape cod canal

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/11/2021

Ray West

**Email**

[rrrwest@yahoo.com](mailto:rrrwest@yahoo.com)

**2. Sector (Commercial/Recreational) Allocations**

I recommend  
2a-3 87% Rec, 13% Comm

**4. Rebuilding Plan**

recommend  
4b Constant harvest – 4-year Rebuilding Plan

**5. Transfers**

no action

**8. General Comments**

please manage for abundance

**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

**Date Submitted**

03/11/2021

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Dave Surdel

**Email**

[dsurdel@wiley.com](mailto:dsurdel@wiley.com)

**8. General Comments**

The fisheries management council needs to act quickly and aggressively to halt the decline of our Bluefish population and restore an abundant fishery. As I recreational angler that travels all over New England from Cape Ann to Montauk, I have witnessed the bluefish population crashing over the last 10 years. It has reached the point where the inshore recreational bluefish opportunity is nearly nonexistent. Long gone are the days when we could expect thousands of bluefish to be patrolling their traditional strongholds from Cotuit to Monomoy and Sankaty to Montauk. This fishery ran like clockwork for the better part of 20 years. But the bluefish are not there anymore. You can hardly find them in a boat, much less fishing from shore. The bluefish are gone and the commercial fleet that helped wipe them out has gone away. The years and years of greed and 'recremercial' charter captains wiping out the inshore fishery coupled with overly generous (and widely unenforced) bag limits have decimated our population. My friends used to brag about how many pounds of bluefish they could fill the boat with and still make it back to the ramp from Nantucket. Now the fishery is so decimated, it's hardly worth the trip.

The burden of responsibility for this mismanagement falls on the fishery councils. It's clear that councils have failed to maintain a healthy fishery. It's a pity it has come to this, particularly given the dire straits the Striped Bass are in for the exact same reasons: complete stock mismanagement coastwide, bickering between states over resource-grab and prioritizing a small special interest group of commercial and charter captains to the detriment of the overall resource. Too little action is being taken, too late. Please stop micromanaging the statistics, debating percentages, and rolling out stop-gap measures. Everyone can see through that at this point. Trivial changes make little impact. The fisheries councils need to take drastic measures to protect our bluefish stock before it's too late. If that means stopping commercial fishing and implementing a recreational moratorium, please do it. Commercial opportunity goes beyond a handful of commercial fisherman. It also impacts coastal communities through declining charter business. Fisherman that once that once traveled to Cape Cod to have fun, stay in our hotels and eat at our restaurants are disappearing quickly.

Please do the right thing and take immediate action to stop the overfishing by all sectors and restore this once-abundant fishery to it's former glory.

Thanks, Dave Surdel

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts, Rhode Island, Connecticut, New York

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/12/2021

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Andreas Sofronas

**Email**

[asofronas@students.stonehill.edu](mailto:asofronas@students.stonehill.edu)

**1. FMP Goals and Objectives**

I think that there should be more regulations for bluefish. Over the past few years bluefish have not arrived in the numbers that they have historically. They have not arrived in June and July when they are supposed to, rather they are showing up in my area in August and don't stay very long. When they did arrive, we didn't catch many of them but they are very fun fish to catch and pound for pound I think they put up a better fight than bass do. People will take the full bag limit of blues when they do not need all of that bluefish. I think that bluefish deserve just as much respect as bass do and should have similar regulations as the striped bass.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/17/2021

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Josh Tanz

**Email**

[jbtanz@gmail.com](mailto:jbtanz@gmail.com)

**2. Sector (Commercial/Recreational) Allocations**

I am in support of reduced commercial limits and stricter recreational limits as well (size limits and bag limits) and for immediate implementation of any changes.

**8. General Comments**

Bluefish have been over-harvested and overfished. The goal should be reduced harvesting and stricter recreational rules implemented immediately in order to increase and then maintain bluefish populations at the highest levels possible

**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

**Date Submitted**

03/23/2021

Thomas Fuda

**Email**

[tom.fuda@gmail.com](mailto:tom.fuda@gmail.com)

**1. FMP Goals and Objectives**

Regarding proposed goals 1.2 and 2.1, 2.2: I feel the term "discard mortality" is somewhat misused at times. It basically sounds like it is not taking into consideration the fact there is a fairly large segment of the recreational sector that often catches and intentionally releases Bluefish as sport, and not in response to any regulation that mandates "discarding" the fish. Participants in this mode of fishing often have no intention of keeping fish, but rather they see value in the experiencing the thrill of catching the one of the most aggressive and strongest fish, on a pound per pound basis. I'm all in favor of promoting better handling to reduce "release mortality", but let's not underestimate the value these anglers place on the experience of fishing for Bluefish, nor the economic benefit seen by the money this sector spends. So, when crafting goals that seek to reduce release mortality, we don't reduce access to this sector of the recreational fishery.

**2. Sector (Commercial/Recreational) Allocations**

I am in favor of the status quo option (2a-1) regarding commercial / recreational allocation.

**4. Rebuilding Plan**

Regarding the Rebuilding Plan: I am in favor of option 4c (5-year rebuilding plan). I feel this offers the best compromise between rebuilding the stock quickly, while reducing the socioeconomic impact to the commercial fishery and fishing communities.

**5. Transfers**

Regarding Sector Transfers: I am in favor of option 5a-1 (status quo). I'm more concerned with rebuilding the stock to abundant levels than I am with making unused commercial allocation available for recreational harvest.

**6. Management Uncertainty**

Regarding Management Uncertainty: I am in favor of option 6b (Post-sector split). I feel this provides for a more equitable application of management uncertainty.

**7. De Minimis Provisions**

Regarding De Minimis Provisions: I am in favor of option 7e (2020 management measures). This option provides for consistent coast-wide regulations.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Connecticut

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/29/2021

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Craig Eldredge

**Email**

[bubbaboards@bellsouth.net](mailto:bubbaboards@bellsouth.net)

**2. Sector (Commercial/Recreational) Allocations**

As a recreational fisherman I would like you to reconsider the 3 fish limit to exclude snapper blues from the limit . Maybe a slot size is a better alternative.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

03/30/2021

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David Cannistraro

**Email**

[fastboat01@yahoo.com](mailto:fastboat01@yahoo.com)

**1. FMP Goals and Objectives**

Stop the commercial fishery. They decimate whole schools of Bluefish.

The recreational fishery adds much more to the economy without destroying the gene pool.

**Primary state(s) you land bluefish in:**

Massachusetts

**Date Submitted**

03/31/2021

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James Molinaro

**Email**

[jim.m1@verizon.net](mailto:jim.m1@verizon.net)

**1. FMP Goals and Objectives**

I would like to support 2a-5 for shore anglers and charter boats .

**2. Sector (Commercial/Recreational) Allocations**

I support 3a-3 !

**3. Commercial Allocations to the States**

3D-3

**4. Rebuilding Plan**

4d

**5. Transfers**

5b-1

## 6. Management Uncertainty

6b

## 7. De Minimis Provisions

7b

### How would you describe your primary role in the fishery?

Recreational (private angler)

### Primary state(s) you land bluefish in:

New Jersey, Delaware, Virginia, North Carolina

### Gear type(s) used

Hook and line or handline

### Date Submitted

04/01/2021

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Preston Southwick

### Email

[prsouthwick123@yahoo.com](mailto:prsouthwick123@yahoo.com)

## 3. Commercial Allocations to the States

netting must be banned for the health of all species that call our United States waters home. It is an indiscriminate harvesting method that has no way of limiting bycatch.

### 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

### Date Submitted

04/01/2021

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William Doan

### Email

[doanbill@aol.com](mailto:doanbill@aol.com)

## 1. FMP Goals and Objectives

Bluefish have been overfished. Both recreational and commercial fishing share the blame. I saw too many people keeping bluefish that they had no intention of eating. The former 15 fish limit really hurt their population. Bluefish are harder to find now and larger ones are harder to find as well. I release all bluefish I catch to try to help the population rebuild.

## 2. Sector (Commercial/Recreational) Allocations

I favor the the 2a-2 option.

### 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

**Date Submitted**

04/03/2021

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Paul Tokarz

**Email**

[tok67@verizon.net](mailto:tok67@verizon.net)

**1. FMP Goals and Objectives**

Needs to be revised

**2. Sector (Commercial/Recreational) Allocations**

I would rather see the 5 year closure. To rebuild the stock.

**3. Commercial Allocations to the States**

3A

**4. Rebuilding Plan**

4CC

**5. Transfers**

Closure

**6. Management Uncertainty**

Closure

**7. De Minimis Provisions**

7E

**8. General Comments**

Closure for 5 years

**How would you describe your primary role in the fishery?**

Other

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

04/04/2021

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Daniel Lester

**Email**

[dannylester@optonline.net](mailto:dannylester@optonline.net)

**1. FMP Goals and Objectives**

Status quo

**2. Sector (Commercial/Recreational) Allocations**

2a-1 status quo

**3. Commercial Allocations to the States**

New york should get more quota.

**4. Rebuilding Plan**

Status quo

**5. Transfers**

Status quo

**6. Management Uncertainty**

Status quo

**7. De Minimis Provisions**

Status quo

**How would you describe your primary role in the fishery?**

Commercial

**Primary state(s) you land bluefish in:**

New York

**Gear type(s) used**

Pound net

**Date Submitted**

04/07/2021

GRACE JORGE

**Email**

[gracemjorge@aol.com](mailto:gracemjorge@aol.com)

**1. FMP Goals and Objectives**

REFER TO GENERAL COMMENT

**2. Sector (Commercial/Recreational) Allocations**

REFER TO GENERAL COMMENT

**3. Commercial Allocations to the States**

REFER TO GENERAL COMMENT

**4. Rebuilding Plan**

REFER TO GENERAL COMMENT

**5. Transfers**

REFER TO GENERAL COMMENT

**6. Management Uncertainty**

REFER TO GENERAL COMMENT

**7. De Minimis Provisions**

REFER TO GENERAL COMMENT

**8. General Comments**

FORGIVE THE LACK OF FINESS OR POLITICALLY CORRECTNESS MUMBO-JUMBO! THE JERSEY SHORE SUFFERS A SERIOUS INFLUX OF OUT-OF-STATE RESIDENTS, WHICH SERIOUSLY TOLLS THE LIMITS OF RECREATIONAL CAPTURE. SUPPORT STATE RESIDENTS LIKE THEY SUPPORT YOU, AND IMPOSE THE SNAPPER LIMIT OF 3 PER PERSON ON OUTSIDERS...& INCREASE THE RCL FOR RESIDENTS FROM 3 TO 4 ON BLUEFISH (AVERAGE HOME HAS COUPLE & 2 CHILDREN), 3 TO 15 ON SNAPPERS & MANDATORY REGISTRY PROGRAM WHERE ADDRESS ON REGISTRATION CARD MATCHES A GVT ISSUED PICTURED ID! TIRED OF PAYING FOR THE BRAINLESS ACTS OF OTHERS AND BE LUMP-SUMMED WITH COMMERCIAL



BUSINESS, WHEN MOST OF US ARE NOT FISHING DURING THE WEEK OR EVEN ABLE TO FISH EVERY WEEKEND! YOU WILL NEVER CONVINC ME THAT RECREATIONAL FISHING AND NJ RESIDENTS ARE THE PROBLEM AND SOMEONE SHOULD CONSIDER OUTSIDERS THAT COME HINDER OUR SHORT-SPAN SUMMER FUN, ESPECIALLY WHEN A SPECIES SUCH AS SNAPPERS IS AVAILABLE FOR SUCH A SHORT WINDOW.

ALTERNATIVE: MAKE REGISTRATION MANDATORY FOR A FEE, DOUBLE THE FEE FOR NON-RESIDENTS & PUT A STOCK FISHERY TO WORK...CREATES JOBS, MAINTAINS FUN AND KEEPS EVERYONE HAPPY!!!

GIVE INSTEAD OF TAKE...MAKE JOBS INSTEAD OF ROBBING US ALL THE FUN WHEN WEATHER AND WORK PERMITS US TO SPEND A COUPLE OF HOURS OF FUN AWAY FROM JOB AND HOME!

**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

**Date Submitted**

04/09/2021

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Michael Rapoza

**Email**

[rapdiver@comcast.net](mailto:rapdiver@comcast.net)

**8. General Comments**

As usual the marine fishery council has failed to act in a timely fashion and another valuable( bluefish) resource is on the verge of collapse.

Commercial fishery is always put first and money is the motivation.As an avid recreational fisherman I see lack of real oversight by the council.

Striped bass ,tautog, and Squetague were once abundant and now have become a shadow of what they once were.

The council needs to have a backbone and regulate our Commercial and recreational fisheries in a sustainable way

**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

**Date Submitted**

04/17/2021

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jean publiee

**Email**

[jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)

**1. FMP Goals and Objectives**

again this agency has failed to protect the fish stocks by being captured by the commercial fishing industry too many reps are on these councils from fishing councils when it should be populated by environmental representatives. the commercial fishing industry has a philosophy of take it all immediately and they sneak and take more than any quotas that this agency give them. they lie to take more as well. all quotas in this species should be cut by 75% to the commercial fising industry. they are the ones who are stealing the fish. this comment is for the public rcord. the focus shoudl be on sustainability, not rape the oceans so that nothing lives there anymore

**2. Sector (Commercial/Recreational) Allocations**

all above shoudl be cut by 75%

**3. Commercial Allocations to the States**

all allocations shoudl be cut by 75% immediately

**4. Rebuilding Plan**

shut down all harvest of this species. all harvest shoudl be shut down. that is the best plan

**5. Transfers**

i see no reason for any transfers from any other site

**6. Management Uncertainty**

this agency needs change within itself. the focus on members from teh commercial fishindustry is seriously prejudicing this agency in its deliberations and pronouncements. certainly action to cut takings and harvesting is immediately needed and necessary

**7. De Minimis Provisions**

management measures -the only ones i want are the ones i propose

**8. General Comments**

cut all takings and harvest

**How would you describe your primary role in the fishery?**

Other

**Primary state(s) you land bluefish in:**

New Jersey

**Gear type(s) used**

Pound net

**Date Submitted**

04/19/2021

Richard Allebach

**Email**

[rsallebach@verizon.net](mailto:rsallebach@verizon.net)

**2. Sector (Commercial/Recreational) Allocations**

Any allocation changes need to directed toward the idea that the current plan is not working and what can be done to bring about the most improvement the fastest while still being fair to both parties.

**4. Rebuilding Plan**

I think that the plan should be geared more to catch and release of bluefish than it has been because the resource has been abused by many "recreational " fishermen.

**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

**Date Submitted**

04/20/2021

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Robert Pride

**Email**

[bobpride@gmail.com](mailto:bobpride@gmail.com)

**1. FMP Goals and Objectives**

Support proposed objectives.

**2. Sector (Commercial/Recreational) Allocations**

Support 2a-2 89% rec, 11% comm - Better reflects recent fishery dynamics

Support Phase in option 2b-2 - minimize commercial impact over time

**3. Commercial Allocations to the States**

Support

3a-4 - rewards states with new entrants but give credit for long time players who developed the fishery

3b-2 - works to minimize impacts over time

3c-2 - no additional reward for recreational transfer

3d-3 - (reduce dead discards for incidental bycatch)

**4. Rebuilding Plan**

Support 4d - minimizes commercial impacts and allows time for participants to adapt and build better business strategies

**5. Transfers**

5a-2 - Why not?

5b-2 - seems more conservative for protecting windfall harvest and market gluts

**6. Management Uncertainty**

6b - less sector impact for both sectors

**7. De Minimis Provisions**

7e - consistent for all states, easier to implement and manage for the states

**8. General Comments**

Thank you for considering economic and social impacts that led to the longer phase in options. The biggest complaint from fishermen in all sectors (other than the general grumble about allocations and restrictions) is inconsistent rules from year to year. Perhaps a longer phase in period for changes will minimize year to year changes.

**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

**Date Submitted**

04/20/2021

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Tim Stroud

**Email**

[timstroud@yahoo.com](mailto:timstroud@yahoo.com)

**1. FMP Goals and Objectives**

I propose a 12" minimum size limit with a 6 fish creel limit for recreational fishermen. Most people consider bluefish to be trash fish and do not keep them.

**2. Sector (Commercial/Recreational) Allocations**

Currently, the 3 fish per day for rec, and 800 pound per day for commercial is inequitable. Gill netting should be banned as gill nets target all marine fishes, mammals, and reptiles indiscriminately. If a gill netter catches 1600 of bluefish, or any other regulated fish, they must discard the overages and waste 800 pounds of dead or dying fish.

**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

**Date Submitted**

04/20/2021

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John Redmond

**Email**

[jredm10204@aol.com](mailto:jredm10204@aol.com)

**1. FMP Goals and Objectives**

Until North Carolina stops all shrimp trawls in the inshore waters. Nothing you do will help any fish recover and you all know it.

**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

**Date Submitted**

04/20/2021

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Stephen Hickman

**Email**

[bigsteve1998@yahoo.com](mailto:bigsteve1998@yahoo.com)

**2. Sector (Commercial/Recreational) Allocations**

There definitely does not need to be a shift in the allocations. The commercial sector does not need less than the 17% than they are getting. Taking any away will have a negative impact in NC.

**4. Rebuilding Plan**

There needs to be no action taken. Bluefish are abundant and most of the time its hard to avoid them while trying to catch other species of fish.

**8. General Comments**

This statement in the proposal is about the most asinine thing I've ever read.

" Relative to the status quo alternative, alternative 2a-2 would have positive impacts for recreational user groups, and in particular for those groups in communities that are highly engaged in and reliant upon recreational fisheries. The top fifteen communities in recreational fishing engagement and reliance are displayed in Figure 9 and Figure 11. Please note that the recreational fishing engagement and reliance scores are not bluefish specific, the metrics were based off of fishing engagement and reliance for all recreational species. For a more thorough introduction of community fishing engagement and social vulnerability indicators please reference Appendix A. These communities are likely to benefit from Alternative 2a-2, but some may see greater positive social impacts based on relative social vulnerabilities and reliance on the recreational industry. Communities in NC in particularly, such as Topsail Beach, Hatteras, and throughout the Outer Banks, have high reliance on recreational fisheries while at the same time moderate to high poverty, labor force vulnerability, and housing vulnerability. Increasing recreational allocations for bluefish could improve economic opportunities and result in positive social outcomes for these communities in particular. "

Apparently you don't realize the people you are talking about living in poverty are the commercial fisherman whom the government is trying to regulate out of business with the help of the CCA. The CCA sends me at least 2 emails a week with their objectives with one of the latest trying to ban all nets in the sound with a ballot referendum. Yes these communities rely a lot on recreational fishing but giving the recreational industry more quota will not improve the economic opportunities and positive social outcomes. I know this because I've called Hatteras home for my entire life. Taking fish away from the people who need it the most is not the answer. Prioritizing someone's fun over someone trying to make a living and reprehensible. The tackle shops and guides are doing great with the way things are now, there is no need for any change.

**How would you describe your primary role in the fishery?**

Other

**Primary state(s) you land bluefish in:**

North Carolina

**Date Submitted**

04/21/2021

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Christopher Hickman

**Email**

[bouttimefishing@yahoo.com](mailto:bouttimefishing@yahoo.com)

**2. Sector (Commercial/Recreational) Allocations**

I believe that 2a-1 should stay in place until the recreational sector is brought into compliance because they go over their quota every year..

**3. Commercial Allocations to the States**

I believe the allocations to the states should stay the same until the recreational sector is brought into compliance with their quota. We can't reallocate until the recreational sector stops catching over their quota.

**4. Rebuilding Plan**

4a is the recommended action until both sector can be brought into compliance with the quota.

**5. Transfers**

5a-1 is recommended as it seems to be working as it should.

**6. Management Uncertainty**

Keep with the status quo.

**7. De Minimis Provisions**

Status quo.

**Date Submitted**

04/21/2021

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Carroll Clayton

**Email**

[carrollc@esinc.net](mailto:carrollc@esinc.net)

**1. FMP Goals and Objectives**

As a 35 year veteran recreational surf fisherman, I appreciate this action you are taking to bring back the bluefish population. I watched the opportunity to catch bluefish decline significantly once they started appearing on restaurant menus and heard they were being harvested commercially. We all face the situation where the ocean cannot support mankind's desire for a larger amount of all fish.

**2. Sector (Commercial/Recreational) Allocations**

Obviously status quo is not working. The percentages are pretty even.

I like 2b-2

**4. Rebuilding Plan**

I support the 4-b plan.

**5. Transfers**

I support 5a-1

**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

**Date Submitted**

04/22/2021

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Scot Calitri

**Email**

[smcalitri@gmail.com](mailto:smcalitri@gmail.com)

**1. FMP Goals and Objectives**

I support alternative 1A, but we need to look at Optimum Yield rather than Maximum Sustainable Yield. Maximum Sustainable Yield brings us on the razor's edge of failure and especially with a fishery with a heavy non-commercial element, the economic elements outside of "selling meat" are better represented by Optimum Yield.

**2. Sector (Commercial/Recreational) Allocations**

I support Alternative 2a-4 as we need immediate action and to best represent the baseline years most advantageous to the fishery!

**3. Commercial Allocations to the States**

I can't pretend to understand all of this, but we need to manage in favor of the fish. The Bluefish is not fueling anyone's full time commercial salary.

**4. Rebuilding Plan**

I support Alternative 4c, which is based on the Council's risk policy and projected to rebuild the stock within five years.

**5. Transfers**

Transfers are never good for the fishery. Transfers should not be allowed under the Bluefish Management / Rebuilding Plan.

**6. Management Uncertainty**

I support 6b as we need to protect this fishery and the economic value that the recreational sector produces. In all cases, a recreational fish is much more valuable than a commercial table fish.

**7. De Minimis Provisions**

7a needs to be the option as conservation equivalency cannot game this fishery too. Think and speak for the fish, not for those looking to cheat the system or find loopholes.

**8. General Comments**

Here's a great opportunity to speak for the fish in a less heated situation. Bluefish is not the key to any commercial incomes. Let's give them a chance and aggressively rebuild the stock.

A sincere thank you to those working to provide us with a sustainable, abundant stock. This is not easy work, but know that doing the right thing for the fish is always the way to lean. We're ruining so much as a species, Bluefish and other nearshore species are truly in our control to save.

The Bluefish need us.

Thank You.

**How would you describe your primary role in the fishery?**

Recreational (for-hire)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

04/22/2021

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Andrew Bosco

**Email**

[ndrwbosco@gmail.com](mailto:ndrwbosco@gmail.com)

**1. FMP Goals and Objectives**

While we support the proposed goals and objectives, we would like to see “optimum yield” discussed as an objective.

**2. Sector (Commercial/Recreational) Allocations**

Therefore, i support Alternative 2a-4 because it uses a combination approach of historic and recent data, all of which lead to the same result.

**3. Commercial Allocations to the States**

No stance

**4. Rebuilding Plan**

I prefer Alternative 4c, a five-year rebuilding plan

**5. Transfers**

For these reasons, i support removing quota transfers from the Bluefish FMP.

**6. Management Uncertainty**

I support Alternative 6b, the post-sector split

**7. De Minimis Provisions**

I support Alternative 7a, the status quo.

**8. General Comments**

N/a

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Maine, New Hampshire, Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

04/22/2021

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John LaFountain

**Email**

[foxseafood@gmail.com](mailto:foxseafood@gmail.com)

**1. FMP Goals and Objectives**



Hello,

I stated most of my comments and what I supported via the online meeting . I just wanted add to # 2

## **2. Sector (Commercial/Recreational) Allocations**

As you know my smoked fish business in Narragansett RI purchases a lot of bluefish by from boats and dealers in Rhode Island and from dealers from the eastern states. Just wanted to emphasize that the commercial value of the fishery is not just in the amount paid to the boat.

Although that price has increased significantly. I heard the comment that the "highest value of the fish is to leave it in the water" as it is a lower value fish. I don't think it is considered a lower value fish anymore. I went through my numbers and after checking the retail prices being paid for smoked bluefish \$17.99 to \$22.99 a pound the retail value of just what I produce is over \$1.1 million . My fish is being sold predominantly at fish markets, farmers markets, smaller independent grocery and gourmet markets all up and down the east coast. These are small business many of which are family owned and operated. I have only 3 albeit well paid employees that receive \$18 to \$23 an hour and health benefits. I know a lot of these fish markets pay and treat their employees well as I do. We have developed the market for smoked bluefish over many years with these customers. From Portland Maine to Chatham MA to Martha's Vineyard , Long Island , the jersey shore , down into Maryland these customers rely on us for a steady year round supply of this local Atlantic shore fish.

If you think about the amount of individual servings and people experiencing this and the joy it brings not to mention healthy nourishment. 500,000 servings is what we make a year.

We cannot afford to give anymore of the commercial percentage to the recreational sector. Smoked Bluefish is a traditional culinary East Coast treat!! Very few recreational fisherman will actually take bluefish on a regular basis and eat it. And even fewer will do the work to smoke it. And if they do most don't do it again. The main way that people enjoy bluefish is by purchasing it either smoked or filleted with the blood lined removed from a local fish monger and that fish must be landed by a commercial vessel.

Side point:

If the recreational sector is mostly catch and release then I have know idea how the estimated numbers they are taking could possibly be that high

### **How would you describe your primary role in the fishery?**

Commercial

### **Date Submitted**

04/22/2021

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Norm Staunton

### **Email**

[norm.staunton@gmail.com](mailto:norm.staunton@gmail.com)

## **1. FMP Goals and Objectives**

I support the proposed set of goals and an objectives, specifically Alternative 1(a). I would further add that optimum yield is not just the maximum harvest, or landings, or biomass. Particularly for a

predominantly catch-and-release fishery, the socioeconomic benefits of recreational C&R fishing should be included in this metric. I would further add that optimum yield should incorporate the highest possible ecological distribution of that yield over maximizing yield in a single state... by which I mean that restoration of the fishery in Maine in NH should count toward yield higher than poundage in a currently active fishery.

## **2. Sector (Commercial/Recreational) Allocations**

I support option 2a-5 because the data suggests the the bulk of the landings are already recreational and it has been established in many other fisheries that a fish in the water is worth more than a fish harvested. The bulk of the recreational fishery is catch and release, so lets maximize the benefit of that fishery and make bluefish slightly harder to get on the commercial market, but drive up its price as a result to offset the lost poundage to the commercial sector.

I support no phase in. Its more efficient and we need to act now.

## **3. Commercial Allocations to the States**

I am no fisheries scientist. What I do know is that Bluefish are a migratory fish which used to be abundant in New England waters. They are not now. And I cannot get past the idea that the states with the highest commercial allocations are also the states that make up the gauntlet that fish swim through to get to my home waters in Maine and Rhode Island. I cannot advocate for a specific allocation, but I would encourage the board to enact whatever allocations result in the greatest/widest geographic distribution of fish and economic benefit, not simply the highest harvests.

## **4. Rebuilding Plan**

I support managing for abundance and geographic distribution of fish. As such, I support shortened Rebuilding times. I am not familiar enough with the alternatives to state a preference between 4b and 4c, but I would advocate for whatever alternative provides the fastest recovery, regardless of the impact on short-term harvest. I would prefer recovery over harvest at almost any cost.

## **5. Transfers**

I am absolutely opposed to transferring unused recreational quota to the commercial quota. A fish in the water is worth much much more to the economy and to recreational fishermen (who largely release their catch to be caught again).

Released fish SHOULD NOT be counted as quota. They are not harvested and thus should not count.

I am fully supportive of commercial harvest and commercial fishermen. I was one at one time (in a different fishery). But the recreational sector has a much larger and more equitably distributed benefit than the commercial sector does, and the fishery should be managed (for abundance) as such.

I do not support any of these alternatives, but rather support an end to transfers and its removal from the BFMP.

## **6. Management Uncertainty**

Frankly, I do not think there is sufficient data to support any of these alternatives. There are many challenges to monitoring all catch, all harvest, all mortality and we do not have enough information to be able to accurately predict any one- particularly in light of the fact that many of the bluefish caught by the recreational sector are released. I would support additional research, focused primarily on the

recreational and C&R sectors before supporting any of the stated alternatives. That said, if one must be picked, I would support 6b- Post Sector Split because it minimizes cross-sector impacts.

### 7. De Minimis Provisions

De Minimis catch is a very small portion of the total catch. As such, I would support option 7a but with the additional comment that this is a coastwide fishery. Abundance and greater distribution of benefit (ie increasing De Minimis catch) is actually preferable. Additionally, since De Minimis is calculated only using commercial landings, I would advocate for caution in this approach based on the the ways that other fisheries have used conservation equivalency to manipulate their numbers.

### 8. General Comments

As stated in several sections above, I would support any measures that:

Increase abundance

Distribute fish and economic benefit across the greatest range (including restoration of abundance in states where it once was but is not anymore)

Value a fish in the water over fish harvested for both its social and economic value.

Thank you for taking the time to consider my comments.

### How would you describe your primary role in the fishery?

Recreational (private angler)

### Primary state(s) you land bluefish in:

Maine, New Hampshire, Rhode Island

### Date Submitted

04/22/2021

Robin Calitri

### Email

[csicagain@hotmail.com](mailto:csicagain@hotmail.com)

### 1. FMP Goals and Objectives

As a Charter Captain I completely support the position advocated by the American Saltwater Guides Association to protect and restore a robust sport fishery for Bluefish.

### 5. Transfers

No transfers

### Primary state(s) you land bluefish in:

New Hampshire

### Date Submitted

04/22/2021

Ralph Haddock

### Email

[ralphhaddock@aol.com](mailto:ralphhaddock@aol.com)

### 1. FMP Goals and Objectives

Use the new goals and objectives.

## 2. Sector (Commercial/Recreational) Allocations

Support 2a

## 3. Commercial Allocations to the States

Use 3a

## 4. Rebuilding Plan

4b

## 5. Transfers

5a-1 and 5b-1

## 6. Management Uncertainty

6b

## 7. De Minimis Provisions

7e

## 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

## Date Submitted

04/22/2021

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Thomas Smith

## Email

[bluefish4@comcast.net](mailto:bluefish4@comcast.net)

## 2. Sector (Commercial/Recreational) Allocations

I'm in favor of status quo, every single pound of commercial bluefish on the East Coast has been documented and are extremely accurate , recreational catch is to often randomly and inaccurately determined. I support 2a-1

## 3. Commercial Allocations to the States

I am in favor of 3a-2 or 3a-3 . Due to the natural cyclic nature of bluefish, New York , Massachusetts and Rhode Island has been the epicenter of Bluefish landings for the last 10 years . I feel like this is a trend and also some Southern states with large quota no longer allow certain types of gear types since the 1980s when they were originally given a generous percentage of the bluefish pie. Therefore it is unrealistic to keep the quota the same for those states going forward. Luckily here in Massachusetts we have been able to get a transfer of quota from other states the last 10 years to keep our local fisheries going through the fall instead of a closure in August.

## 5. Transfers

State to state transfers are extremely important to the cyclic nature of the Bluefish fishery. Bluefish are fickle and due to environmental circumstances some states will have an influx of fish some years and lean other years. it's very important to be able to receive or transfer quota to take full advantage of a particular season. I have been full-time commercial bluefishing for over 40 years, in the 60s Bluefish

were unheard of on Cape Cod and it was rare to catch one! by the early 1980s they were literally the most prolific fish off Cape Cod, this boom or bust nature has been going on forever whether they were being fished on or not. Massachusetts Has relied on transfers for many years to keep the local fishermen, restaurants and fish markets in fish through the fall.

**8. General Comments**

Having fished for Bluefish full-time for over 40 years I feel like I've seen almost every aspect of this fishery in New England. We've had lean years followed by incredible years, never been a rhyme or reason whether they are Fished on or not. I feel like the cyclic nature of the fishery is never discussed enough and too many people point fingers at user groups when we have a lean year, most probably due to poor spawning conditions offshore for those particular years that resulted in weak reproduction for that timeframe

**How would you describe your primary role in the fishery?**

Commercial

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Gillnet

**Date Submitted**

04/22/2021

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Nick Martin

**Email**

[nixstyx@gmail.com](mailto:nixstyx@gmail.com)

**1. FMP Goals and Objectives**

I support the current FMP goals.

**2. Sector (Commercial/Recreational) Allocations**

I support Alternative 2a-4.

**4. Rebuilding Plan**

I support alternative 4c.

**5. Transfers**

I do not support either alternative, and instead suggest transfers be removed from the Bluefish Fishery Management Plan.

**6. Management Uncertainty**

I support 6b, the post-sector split.

**7. De Minimis Provisions**

I support the status quo option, 7a.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Maine, New Hampshire

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

04/22/2021

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Elmer Edwards

**Email**

[gannet349@gmail.com](mailto:gannet349@gmail.com)

**1. FMP Goals and Objectives**

Increase Northern Blue Fish quota, and leave Commercial and Recreational Allocations status quo.

**2. Sector (Commercial/Recreational) Allocations**

Commercial and Recreational Allocations status quo

**3. Commercial Allocations to the States**

Increase Northern quota

**5. Transfers**

Allow transfers both ways

**How would you describe your primary role in the fishery?**

Commercial

**Primary state(s) you land bluefish in:**

New York

**Gear type(s) used**

Gillnet

**Date Submitted**

04/22/2021

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Sawyer Clark

**Email**

[sawyerjclark12345@hotmail.com](mailto:sawyerjclark12345@hotmail.com)

**1. FMP Goals and Objectives**

No action/ status quo option

**2. Sector (Commercial/Recreational) Allocations**

Status quo, if possible more to commercial

**3. Commercial Allocations to the States**

Status quo

**4. Rebuilding Plan**

No action/status quo

**5. Transfers**

No action/ status quo

**6. Management Uncertainty**

No action/status quo

**7. De Minimis Provisions**

No action/ status quo

**8. General Comments**

As a pound trap fisherman in New York, I would like to see more bluefish quota go to the commercial fishermen. I know it is unrealistic, but in this day and age the fishing industry is under a lot of pressure. With this, if you take more quota away from commercial fishermen you are increasing the financial strain and may force many people to leave the industry. Last year with plenty of blue fish around we were shut down and no quota was transferred from recreational to commercial, with this loss of fish my income suffered tremendously. In my eyes, if recreational fisherman lose a couple fish it won't have any impact on their day or year. While if we were to lose quota I may not be able to afford my mortgage or start a family.

**How would you describe your primary role in the fishery?**

Commercial

**Primary state(s) you land bluefish in:**

New York

**Gear type(s) used**

Pound net

**Date Submitted**

04/22/2021

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Richard Rich

**Email**

[rich18rich@aol.com](mailto:rich18rich@aol.com)

**1. FMP Goals and Objectives**

a sustainable optimal yield should be up for discussion.

**2. Sector (Commercial/Recreational) Allocations**

2a-4 would be best, looking at the numbers.

**3. Commercial Allocations to the States**

3a-3.

**4. Rebuilding Plan**

5 year risk policy would be my choice.

**5. Transfers**

quota transfers should be removed.

**6. Management Uncertainty**

post-sector.

**7. De Minimis Provisions**

7a status quo.

**How would you describe your primary role in the fishery?**

Recreational (private angler)

**Primary state(s) you land bluefish in:**

Maine

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

04/22/2021

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John Toth

**Email**

[tothjohn@verizon.net](mailto:tothjohn@verizon.net)

**1. FMP Goals and Objectives**

I attended this Webinar and hav the following comments to make:

This Webinar was poorly attended and I believe only a total of 15 people were on it which is not giving you the information you need to make a thoughtful decision on any option. Better posting of these meetings needs to be done or outreach!

Bluefish are not on our inshore waters as they used to be because of habitat issues caused by sandmining, Sandy and climate change which gives the impression that the stocks ar in trouble. Because of these issues also affecting the lack of bait, the bluefish have moved off to federal waters.

We are allowed to catch 3 fish from shore and 5 fish fro for-hire boats. How much more can you cut back from the recreational sector? Do more and you will put more tackle shops and for-hire boat out of business already struggling because of COVID-19! John Toth JCAA President

**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

**Date Submitted**

04/23/2021

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Rick Sasser

**Email**

[rick.sasser@hotmail.com](mailto:rick.sasser@hotmail.com)

**1. FMP Goals and Objectives**

I am in favor of revised goals and objectives. It is a management travesty for bluefish to be overfished and overfishing occurring in all but one of the most recent years. Commercial harvest, although small, should be honestly reviewed. I hope we are not commercially harvesting bluefish for cat food like we did at a time weakfish. We know what happened to weakfish. Bluefish should be management for abundance.

**2. Sector (Commercial/Recreational) Allocations**

Move immediately to a 89/11 split- options 2a-2 and 2b-1.



### 3. Commercial Allocations to the States

3a-1

3b-1

3c-1

3d-1

### 4. Rebuilding Plan

4C meet the 5-year rebuilding plan.

### 5. Transfers

We need to stop the transfer of unused quota from the recreational sector to the commercial sector. We should be retaining unused recreational quota in the biomass to build abundance.

Choosing one it would be 5b-2.

### 6. Management Uncertainty

6a No Action

### 7. De Minimis Provisions

7c

### 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

### Date Submitted

04/23/2021

Sarah Schumann

### Email

[schumannsarah@gmail.com](mailto:schumannsarah@gmail.com)

### 1. FMP Goals and Objectives

no comment

### 2. Sector (Commercial/Recreational) Allocations

Preferred option: 2a1, status quo

The reason we are recommending the status quo is that the commercial fleet cannot afford any major reductions to the commercial quota. If bluefish were a secondary species that we could live without,

this might be different. But for boats like the one I work on, it is our primary target. Any lowering of the ABC will already make it harder for us to keep generating the income to support ourselves, our families, and our businesses. To then further curtail the commercial quota by reallocating some of it to the recreational sector would only further the economic damage on the commercial fleet.

### 3. Commercial Allocations to the States

Preferred options:

3a-3 (10-year) AND 3b-1 (no phase-in) OR 3a-2 (5-year) AND 3b-2 (allocation change spread over rebuilding plan)

Bringing allocations up to date with the current distribution of the fishery resource is really critical. There are arguments for doing this as fast as possible, for the sake of the fishermen in areas where the stock is increasing (like me). But there are also arguments for taking a more gradual pace, following a "just transitions" framework for those whose access to the stock is shrinking as the its center of biomass shifts.

Even though an immediate re-allocation based only on the most recent years is in my own self-interest as a Rhode Island fisherman, I see the wisdom in taking an approach that is more considerate of states to our south. Thus, I am recommending one of two combinations, both of which I believe present a compromise solution.

Moreover, in general, I tend to feel that a 10-year basis may be better for taking into account the effects of inter annual variability in stock distribution. But I will defer to the scientists on that.

### 4. Rebuilding Plan

Preferred option:

4c P\* Council Risk Policy – 5-year Rebuilding Plan

### 5. Transfers

Preferred options:

5a-1 No Action/Status Quo

5b-1 No Action/Status Quo

### 6. Management Uncertainty

Preferred option:

6b Post-Sector Split

### 7. De Minimis Provisions

Preferred option:

7d Recreational De Minimis – rollover management measures

### 8. General Comments

I work as a deckhand on an inshore gill netter out of Point Judith, RI. Bluefish is our primary target species and it makes up the lion's share of our income. Our bluefish goes to the local smokehouse. From there, it is distributed to fish markets, farmers markets, smaller independent grocery and

gourmet markets all up and down the east coast. Fox Seafoods smoked bluefish is the finest smoked fish around!

There are not many commercial boats that make bluefish a key part of their fishing portfolio. But for those who do, like us, it's a really big deal.

According to my captain, who's been fishing them far longer than I have, there has not been any decrease in our catch of bluefish in recent years. Ever since I started working on this boat in 2019, we have been doing well. However, each year we have to ask our state to secure state-to-state quota transfers because the quota runs out long before the fish have departed out local waters each fall. Any drastic reductions in RI's bluefish quota would cause our season to end much earlier than it currently does, and would have serious impacts on our income.

In addition, we would like to recommend consistency in the minimum size for bluefish, bringing all states into alignment with Rhode Island's minimum size of 18". The market for small bluefish is limited and we believe it is preferable to allow them to mature before harvesting them.

**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

**Date Submitted**

04/23/2021

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James Goodhart

**Email**

[jgoodhart56@aol.com](mailto:jgoodhart56@aol.com)

**1. FMP Goals and Objectives**

Bluefish management has been a failure for several decades. We used to have an abundant population until 20 years ago. Now catching any bluefish is a very rare occurrence. I haven't been able to take out clients to target bluefish for over ten years, because the population is so decimated. We need to take immediate and drastic action!

**2. Sector (Commercial/Recreational) Allocations**

2a-2

**4. Rebuilding Plan**

4b

**5. Transfers**

5b-2

**8. General Comments**

Bluefish management has been a failure for several decades. We used to have an abundant population until 20 years ago. Now catching any bluefish here is a very rare occurrence. I haven't been able to take out clients to target bluefish for over ten years, because the population is so decimated. It concerns me that it has taken so long to accept and come to grips with the reality that this once abundant resource has been massively depleted. Immediate and decisive action is definitely needed and half measures should be unacceptable!

Capt. James Goodhart  
Shadowcaster Charters

**How would you describe your primary role in the fishery?**

Recreational (for-hire)

**Primary state(s) you land bluefish in:**

Massachusetts

**Gear type(s) used**

Hook and line or handline

**Date Submitted**

04/23/2021

Timothy Froelich

To Whom it May Concern:

I am writing in regards to the bluefish allocation and rebuilding amendment. I feel as though, if the bluefish have not been rebuilt we need to re evaluate the goal. We are not even close. That is a red flag that something is very wrong. Maybe those standards are too high. Things are not what they were back then. They are not what they were back in the 80's when those standards were put into place. The spots where the bluefish would grow are developed now and the bluefish are not going there anymore. The little creeks all have houses on them and the meadows are built on. The water quality is not the same. The bluefish may never come back to that level.

Also, I feel they cannot take anymore from the commercial fisherman to give to the recreational. They can redistribute commercial quota from other states to give to New York so they don't have to transfer.

Timothy Froelich

**Date Submitted**

04/23/2021

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Bonnie Brady

**Email**

[greenfluke@optonline.net](mailto:greenfluke@optonline.net)

**1. FMP Goals and Objectives**

Because of the historical overfishing by the recreational sector and limited discards in the commercial sector, it would be a plus for the overall sustainability of the fishery to make both sectors carry accountability measures, such as pound for pound payback.

Commercial fishermen should not suffer a loss to their sector's quota because of chronic overfishing of the stock by the recreational fishery.

These comments are on behalf of the Long Island Commercial Fishing Association.

**2. Sector (Commercial/Recreational) Allocations**

Sector allocations.

We support 2A-1 status quo

Should 2A-1 not be chosen, then and only then do we support re phase in 2B-2

**3. Commercial Allocations to the States**

We support 3A-2 or 3A-3, 3B-2, and 3D-1

**4. Rebuilding Plan**

We support 4D

**5. Transfers**

We support 5A-1 and 5B-1

**6. Management Uncertainty**

We support 6B

**How would you describe your primary role in the fishery?**

Commercial

**Primary state(s) you land bluefish in:**

New York

**Date Submitted**

04/23/2021

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### 3.2 EMAIL AND LETTER COMMENTS

**From:** Jean Public <jeanpublic1@yahoo.com>

**Sent:** Monday, February 22, 2021 2:52 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>; dleaning@mafmc.org; info@peta.org; info@pewtrusts.org; scoops@huffpost.com; contac@thedodo.com; info@oceana.org

**Subject:** Fw: MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment comment on bluefish

the fish profiteers steal as much as they admit catching. this agency has been notorious in doing nothing to stop the stealing and poaching that these men do. they pollute the ocean and need to be shut down. the fact that the stock needs rebuilding is a testament to your ineffectiveness and negligence in setting quotas that make sense and are sustainable. obviously you are nothing but a poseur for the fishing profiteers and you let them get away with murder. this comment is for the public record. cut the quota by 50% immediately. jean public1@jeanpublic1@yahoo.com

**From:** Dave Anderson <davez28327@yahoo.com>

**Sent:** Tuesday, February 23, 2021 12:52 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** Blue fish Striped Bass quotas.

You want to be serious about restoring these fish, STOP commercial harvesting of these species for a couple years. The sport fisherman is not the one damaging the survival of the fish. They are NOT taking them by the Metric Ton daily

**From:** Charles Foster <chcfsalar@gmail.com>

**Sent:** Tuesday, February 23, 2021 12:55 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** BLUEFISH

Good day,

I am not a biologist, I am a fisherman and I principally FLY FISH in Massachusetts waters from shore. We have not seen Bluefish plentiful in Massachusetts waters for over ten years. .

Because I also conduct environmental work along the coastline and have done so many times in many states for the past 15 years,

What I see as a supplemental reason for the decline of the species is men with Bags. . Men out scooping up as many juvenile bluefish as they can carry. In New Jersey, In Long Island sound and in anyplace where they can to get a bunch of appetizers which I believe they call "Cocktail blues". Thousands upon thousands of juvenile 5 inch bluefish.

Adult Bluefish are a fantastic gamefish. There just are not enough of them The recreational captain's Charter boats used to slaughter them 10 per person every single day two trips per day and that obviously lent itself to the huge reduction in adult blue fish.

Most everyone knows that Bluefish are not great table fare yet they GAFF MURDER and FILET them by the 10s of thousands along the entire eastern seaboard..NO GAFFING BLUEFISH FOR ANY REASON

Reduce the harvest to ONE fish per Trip just like striped Bass - Reduce the harvest for 5 years - give them a chance to comeback. Just like Striped Bass - Humans are the Problem and the answer,

ENFORCEMENT FINES and LICENSE CONFISCATION. . . .

CHCF

**From:** Harry Van Sciver <hbvwhitebriar@gmail.com>

**Sent:** Tuesday, February 23, 2021 12:56 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** Bluefish

2a-2 is best.

Moderate reduction in commercial, moderate increase in recreational.

And I'm OK reducing Bluefish recreational catch to 5 per day.

Harry Van Sciver  
Marstons Mills, MA

**From:** joebrodsky <joebrodsky@comcast.net>

**Sent:** Tuesday, February 23, 2021 2:43 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** Bluefish and striped bass

I don't think the management of bluefish and striped bass around Cape Cod can be properly done without addressing the harvesting of squid in Vineyard and Nantucket Sounds. Though this is a political hot potato, if we don't limit the harvesting of the favorite food of these species, which also costs us the loss through by catch mortality of several other game fish species, then we are wasting our efforts to support the Bluefish and Striped Bass rebuilding.

Joseph Brodsky  
Falmouth, Ma

**From:** peter erickson <cperickson48@gmail.com>

**Sent:** Tuesday, February 23, 2021 3:12 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** END BLUEFISH TOURNAMENTS

M. Seeley:

Here on Ipswich Bay, through the mid 70's, a fishermen could not give bluefish away. The blues would commonly force schools of mackerel into our cove and up on the rocks, on a dark night one could see comets of bluefish chasing bait and the estuaries were full of "snapper blues" breaking the surface. Boats would approach with garbage cans full of bluefish trying to give them away. And now they are gone.

There was then a period of years when it suddenly occurred to saltwater fishermen that you could actually catch and release as size limits were imposed and the numbers, tho' diminished, began to even out. And as

the striped bass returned, the bluefish population began to stabilize, despite annual bluefish "tournaments" held by every club and marina all along the coast.

The last time I saw bluefish in any numbers was at Lane's Cove in Gloucester. There was a drunken bluefish tournament with blues piled head high on the wharf, in the hot sun.... killed and gone to waste. Unceremoniously dumped overboard. So why'd they have to kill them?

Despite so-called "catch-and-release" tournament rules (when they exist at all) bluefish, by their nature (and their teeth), are hard to release unharmed. Even if numbers could be stabilized through catch-and-release, this is not the way to rebuild stocks. **There will never be a sustainable fishery for bluefish unless it begins with a moratorium on all bluefish tournaments.**

Peter Erickson  
Plum Island  
><iii;>

**From:** n n <gentlemanofthecharcoal@gmail.com>  
**Sent:** Tuesday, February 23, 2021 3:43 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Amendment comment

I've lived in Massachusetts since 1973 and have actively fished salt water for much of that time....and my public comment is that the fishery for bluefish has COLLAPSED. This formerly reliable catch and healthy/high omega 3 fish for consumption is no longer a dinner offering at my table. It has VANISHED from all the inland waters that I have fished my entire life. The decline in both scup and bluefish has made my opinion of Massachusetts waters, particularly Buzzard's Bay...grow from a feeling of ecstasy that I was so lucky to live here...to outright despondency at the ruin of this once great fishery for the average citizen.

One bluefish in 2019...none in 2020...and no scup for the past three years. In 1986 they actually jumped in my canoe at times with the peanut bunker they would chase...what a horrible and devastating decline it has been.

**From:** Mark Mattson <mark.d.mattson@gmail.com>  
**Sent:** Wednesday, February 24, 2021 9:07 AM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish plan comments

Dear MAFMC,  
I read the summary document and the brief 7 point options for management. While I have a degree in biology and a PhD in aquatic ecology from Cornell with coursework in population biology I am confused by your documents. It appears to be a deliberate attempt to obfuscate the science. Furthermore, the narrow range of options you present are not the options we would like to see. I can only assume you are doing this to stifle meaningful public comments so you can choose from a set of limited options that you prefer. The fact of the matter is that MAFMC has repeatedly allowed overfishing and that bluefish, along with the other fish stocks, are at a fraction of past numbers. I hope that someday you will develop the structure and discipline that would allow you to join members of the subphylum vertebrata that you propose to protect.

-Mark Mattson, PhD

**From:** Chris Cain <doskil@gmail.com>  
**Sent:** Wednesday, February 24, 2021 7:24 PM



**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Allocation and Rebuilding Amendment

Bluefish stocks in North and South Carolina are way down from when I was a kid in the 1980s.

They need to be rebuilt

I support 2a-2: 89% recreational, 11% commercial

Thank you

Chris Cain

**From:** Marc Lamothe <marcolamothe.keeper@gmail.com>  
**Sent:** Wednesday, February 24, 2021 7:25 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Comments

I have worked as a charter captain for ten years. My season starts the last week of June, and sometimes extends to the end of September. I primarily work as a school teacher.

In my inaugural charter season bluefish were prevalent in the waters of Saco Bay, Maine, just south of Portland. My first customers were excited and I had many repeat customers from that experience. Most of the fish were in the 8-12 pound category. Since that season I have not had a customer catch a bluefish.

I am not a fisheries biologist, so my knowledge of bluefish numbers on waters south of Saco bay is limited.

I understand that bluefish migrations into Maine have been sporadic historically. As a young fisherman (1972?), bluefish arrived for the "first time in forty years", was the quote from an old fishing friend. In that era (early 70's into 80's) we caught and wasted large, beautiful bluefish, as if the resource would never be depleted, no matter what we did. We showed them off, then buried them in the garden. Striped bass were our preferred table fare.

I believe catch limits and size limits should be implemented. My hope is that if bluefish numbers increase the probability of migrations returning to Maine will increase.

Capt. Marco Lamothe  
Saco, Maine

**From:** Tony Saldutti <tsaldutti99@gmail.com>  
**Sent:** Monday, March 1, 2021 1:51 PM  
**To:** Kiley Dancy <kdancy@mafmc.org>  
**Cc:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Ammendment Feedback

Thank you for allowing a surf fisherman's perspective to drive a better solution for the fish.

Your comments on quota transferring should be a red flag for us. It either tells us the allocation was wrong in the first place, or the fish are in greater trouble than we think, and greater restrictions are an order.

The categorization of boats, whether privately owned or for hire, in the same category as surf fisherman is unfair for the surf fishermen. The boats are hunting the huge schools of fish just like the commercial boats.

It sounds far fetched, but please consider no more new boats and a gradual boat reduction over time.

The surf fisherman are not the problem here. It is the predatory nature of all boats and the technology to find the fish in large numbers that I believe to be the problem.

The beach replenishment processes going on up and down the coast are decimating the habitat for the fish as well. The bait is no longer there to hold the larger fish. We should address this issue ASAP. If they refuse to stop pumping sand, they must be forced to establish structure in the water to reestablish the habitat for the fish. I can't believe all of the tree hugging environmentalists are not all over this!

As for what we can do now, I would suggest the following:

- impose lower overall seasonal limits now in one shot
- implement lower daily catch limits across the board (greater than or equal to one daily)
- institute a bonus system in exchange for a mandatory data log from fishermen
- have all states follow same rules
- institute a voluntary tag program to track migratory trends and mortality

From a heuristic point of view, something is seriously wrong with this fishery. We have not seen large bluefish or striped bass in 3 years on the beach, except a few days in the spring. The fall used to be a bonanza. The peanut bunker and mullet are gone. The sand eels are down significantly. Gannets are gone too. We have to do something drastically now or it will be too late to recover.

Thanks.

Tony Saldutti, CPIM  
610-533-2711  
[tsaldutti99@gmail.com](mailto:tsaldutti99@gmail.com)

**From:** Jean Public <jeanpublic1@yahoo.com>

**Sent:** Monday, March 8, 2021 4:44 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>; info@peta.org; info@seashepherd.org; information@sierraclub.org; info@pewtrusts.org

**Cc:** info@oceana.org

**Subject:** Fw: public comment on federal register

bluefish quotas have been overfished for years and this agency has allowed the species to be overfished. how can we now trust this agency which deliberately allowed this overfishing for years? i am in favor of cutting all quotas by 50% immediately. and no other factors except to start watching what the fishing boats come in with because they are taking 90% over what they are allowed. and you are allowing it by not catching them at

this robbery of our national species. this comentn is for the pubcli record please receipt. jean puboee  
[jeanpublic1@yahoo.com](mailto:jeanpublic1@yahoo.com)

**From:** Robert Severi <robert.severi@gmail.com>  
**Sent:** Monday, March 22, 2021 6:23 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Comments

Dear Sir or Madam,

I'm providing anecdotal evidence for your consideration. I've been a boater fishing inshore around Long Beach Island since 1982. As you know, bluefish stocks, like most others are faltering. For the last two years, not one bluefish has been entered in the LBI Surf Classic. Almost 1,000 surf fisherman fish LBI for 10 weeks in the fall. Large bluefish no longer visit Great Bay in the Spring. I'm a recreational fisherman, not a marine biologist or scientist. Accordingly, I defer to the judgment of such subject matter experts. Please rely on science to determine how to ensure that the bluefish fishery thrives. If a moratorium is required, so be it.

Kind regards,  
Captain Bob

**From:** Dustin C. Leaning <DLeaning@asmfc.org>  
**Sent:** Wednesday, March 31, 2021 11:04 AM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** I just pulled TJ's email comment from our email chain

Good morning,

Looking at data based on "New MRIP" being frustrating is a pretty accurate description...  
The biggest problem with the "scientific data" is that is not scientific. It is anything but. It is simply put- a totally overcomplicated math equation (based on guesses), favoring an environmental or political agenda to rid the world of recreational fishermen.

Harvest figures in such a small state as ours isn't complicated. Connecticut has only 6 target species, all of which are seasonal. You just need access to a small plane with EXPERIENCED fishermen in the passenger seat. After 2 or 3 seasons of figuring out the patterns of the fishermen and working the kinks out, you would find the New MRIP overshoots the figures by 75 -95% for "most" of the species the ASMFC manages.

Thank you,  
Capt. TJ Karbowski  
Rock & Roll Charters  
Clinton, CT  
203.314.3765  
<https://rockandrollcharters.com/>

**From:** Frank Walsh <squidder329@gmail.com>  
**Sent:** Thursday, April 1, 2021 11:31 AM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** "Bluefish Amendment"

I would be happy to see significant catch restrictions on bluefish from snappers to gators. Large bluefish are non-existent within five miles of the beach in Southern New Jersey. Two fish limits for adult fish as they don't freeze well and excess will end up in trash or garden.

Thank You  
Frank Walsh

**From:** Vetcraft Sportfishing <vetcraft@aol.com>  
**Sent:** Thursday, April 1, 2021 3:29 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** bluefish amendment comments

In light of the recent MRIP phone based survey showing a recreational catch 116% higher than the MRFSS data when the bluefish allocation was formed, I think the fairest option is 2a2. In light of the fact that the commercial sector has not utilized their quota (except 2020), can appreciate price increases with reduced quotas, and low price per pound of this fishery, I think the loss of quota to the sector would be minimal. The recreational sector in the Cape May, NJ area where I fish runs many charter trips to target bluefish out on the five fathom bank area. This is also an important fishery from shore sites and is often the first fish caught by the young generations.

I am not in favor of any quota transfers between sectors due to the uncertain nature of fish stock analytics and inaccuracy of MRIP data. Disallowing quota transfers will also help to build back the stock.

Capt Harv  
Vetcraft Sportfishing  
Cape May, New Jersey  
Call or Text 610-742-3891  
Email: [vetcraft@aol.com](mailto:vetcraft@aol.com)  
[www.vetcraftsportfishing.com](http://www.vetcraftsportfishing.com)

**From:** William Nicholson <sirunick@comcast.net>  
**Sent:** Thursday, April 1, 2021 8:04 PM  
**To:** Leaning, Dustin Colson <dleaning@asmfc.org>; Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish management

Thank you for giving a good presentation of a complicated subject! I am a recreational fisherman from Massachusetts. My experience says that the blues are way overfished and should be rebuilt as quickly as possible.

I agree with the comment that the threshold should be raised. I would say at least to 125,000 mt and the target might as well be lowered some to 175,000 mt since we have never come close to the target on the chart. I see no benefit to the consumer by giving the commercial fleet a bigger % of the catch. The recreational fisherman enjoys the freshest fish and they deserve it after a long day on the water. The charter fleet depends on blues to keep their sports happy especially with the lack of stripers.

I am not sure how the catch is verified. I have never been checked in my many years of fishing. I understand that you use estimates but wonder how accurate they are. That said, I would support 4b. Allocation 2a-3 I would not support triggers. As the Navy Seals say "KISS".

Thank you for your work,

William "Nick" Nicholson  
Member Cape Cod Salties

**From:** Dean Pesante <dpesante@cox.net>

**Sent:** Monday, April 5, 2021 7:12 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** Re: Bluefish Management Letter for Mid-Atlantic Fisheries Council Meeting

The only other comment I would have right now is to increase the minimum size limit to 18" for both recreational and commercial. This is the size that the fish are 100 percent sexually mature. Common sense fisheries management. Don't harvest a fish until it has the opportunity to reproduce. We have already done this for the commercial sector here in Rhode Island.

**From:** Arthur D Smith <artsmith@rsnet.org>

**Sent:** Tuesday, April 6, 2021 5:44 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Cc:** Hemilright Jr, Dewey <FVTARBABY@embarqmail.com>; bjseafood <bjseafood@earthlink.net>

**Subject:** Bluefish Allocation and Rebuilding Ammendment

MY NAME IS ART SMITH FROM BELHAVEN, NC. I CONSIDER MYSELF A RETIRED ADVOCATE FOR THE COMMERCIAL FISHING INDUSTRY IN NORTH CAROLINA. I AM DISAPPOINTED THAT THERE IS NO ALTERNATIVE THAT WILL ALLOW FOR AN INCREASE IN THE COMMERCIAL ALLOCATION. THAT BEING SAID I CAN ONLY SUPPORT THE STATUS QUO ALTERNATIVE. I SUPPORT STATUS QUO FOR THE FOLLOWING REASONS.

1. THE COMMERCIAL FISHERY HAS MINIMAL DISCARDS. THE REC FISHERY HAS A SUBSTANTIAL AMOUNT OF DISCARDS. I HAVE BEEN TOLD BY RELIABLE SOURCES THAT REC DISCARDS COULD BE AS MUCH AS NINE MILLION POUNDS PER YEAR. AN INCREASE IN REC ALLOCATION WILL RESULT IN AN INCREASE IN DISCARDS. AN INCREASE IN DISCARDS IS UN-ACCEPTABLE. THE COUNCIL MUST DO ALL IT CAN TO DECREASE DISCARDS.
2. ALTERNATIVES OTHER THAN STATUS QUO WILL RESULT IN COMMERCIAL DISCARDS WHERE NONE EXIST NOW. THE ALTERNATIVES INCREASE QUOTAS FOR STATES LIKE NEW YORK, RHODE ISLAND AND MASSACHUSETTS AND DECREASES FOR STATES LIKE VIRGINIA, MARYLAND AND NEW JERSEY. LOWERING QUOTAS FOR THESE STATES WILL RESULT IN INCIDENTAL CATCHES OF BLUEFISH BEING DISCARDED.
3. I AM RELUCTANT TO BRING THIS POINT UP BUT COMMERCIAL INTERESTS IN NEW YORK, RHODE ISLAND AND MASSACHUSETTS WOULD PROBABLY GO ALONG WITH ALTERNATIVES OTHER THAN STATUS QUO. THESE STATES WOULD BE RECEIVING A LARGER SLICE OF A SMALLER PIE BUT WOULD STILL BE GETTING MORE PIE THAN THEY HAVE NOW. I WOULD THINK THESE STATES WOULD ADVOCATE IN THEIR OWN INTERESTS. IF "FAIR AND EQUITABLE" IS ONE OF THE MANAGEMENT GOALS THIS REDISTRIBUTION OF QUOTA IS NOT FAIR AND EQUITABLE.
4. 83% FOR THE REC SECTOR IS GRACIOUS A PLENTY. THIS DOES NOT NEED TO BE CHANGED. FISH STOCKS MOVE CONTINUOUSLY SO EVEN A FIVE YEAR UPTICK FOR ONE STATE IS NOT INDICATIVE OF A SHIFT IN ABUNDANCE. STATE QUOTAS DO NOT NEED TO BE CHANGED.

5. SINCE I SUPPORT STATUS QUO THERE IS NO NEED FOR ME TO ADDRESS THE OTHER ISSUES SUCH AS "PHASE INS" OR "DE MINIMIS STATUS".

THANK YOU,

ART SMITH  
BELHAVEN, NC

**From:** EDMUND PANZELLA <user@votervoice.net>  
**Sent:** Tuesday, April 20, 2021 10:07 AM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Allocation and Rebuilding Amendment

Dear Mr. Seeley,

Sir, I can tell you that as a recreational fisherman for the last 50 years that bluefish stocks are being decimated, particularly in the last 6 years or so. Hard fighting and easy to catch, Bluefish are essential in introducing young people to fishing. Nothing turns a young fisherman off like a day without action. Do whatever you have to do to restore this vital fishery. Thank you,

Sincerely,

EDMUND PANZELLA  
117 Dish Mill Rd  
Higganum, CT 06441  
[epanzella@yahoo.com](mailto:epanzella@yahoo.com)

**From:** Ken Redman <workkdog@gmail.com>  
**Sent:** Thursday, April 22, 2021 8:06 AM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish amendment

I would like to see the recreational day quota rise from 3 fish/day. I've fished the coast 50 years and can't believe how few fish we as recreational fishermen can actually keep to eat given the financial input we contribute to the economy at the coast while fishing. It has decreased my visits to the coast definitely. Ken Redman, Chapel Hill

**From:** William Keith <user@votervoice.net>  
**Sent:** Thursday, April 22, 2021 1:15 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Amendment

Dear Mr. Seeley,

As an angler that loves sportfishing, I understand the nature of power grabs and attempts to control with regard to management decisions to ensure the bluefish resource returns to a healthy status. The laws of nature work quite well without man kinds meddling. Therefore, I oppose adding any restrictions on the fishery. They will rebuild on their own without your/our interference or help just as they have for thousands of years.

Thank you for your time and consideration.

Sincerely,

William Keith  
PO Box 304  
Gulf Hammock, FL 32639  
[princibill@icloud.com](mailto:princibill@icloud.com)

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**From:** Luis Tirado <[captloutirado@gmail.com](mailto:captloutirado@gmail.com)>  
**Sent:** Thursday, April 22, 2021 8:19 PM  
**To:** Seeley, Matthew <[mseeley@mafmc.org](mailto:mseeley@mafmc.org)>; [comments@asmfc.org](mailto:comments@asmfc.org)  
**Subject:** Bluefish Public Comment

Dear Members of the Board,

I am writing this evening to voice my concern regarding the management of Bluefish. I live in Maine and the Bluefish has become more of a unicorn than a fish. I feel that this is how anglers felt during the Striped Bass crash in the 1980's. Bluefish were once common in our waters, and I can remember when the fishing was so good that this state held Bluefish Tournaments, I know Commissioner Keliher remembers them. It was commonality to see these fish in July and throughout the summer, sadly I have not seen a bluefish in eight years. While that may be somewhat common for other anglers this is alarming to me. I run a charter fishing business, and guide 75-90 days per season.

The bluefish has great value to the recreational community, they provide great sport, they get novice anglers out on the water due to their aggressive nature, they cause clients to book with charter captains, and their unruliness keeps tackle shops in the black. To piggyback on that, they are not exactly great on the table. It is my opinion that they are better off to be enjoyed and then put back.

I am in favor of option 2a-2. And I would like to see measures taken to rebuild the stock as fast as possible. I applaud the measures that were taken last year to decrease bag limits, but I think more needs to be done to bring these fish back to all the states, not just Maine, so that all anglers can enjoy them.

Please take aggressive measures to get this stock back to where it needs to be, not overfished. These fish are too valuable to be taken out of the water and killed.

Thank you for your time,

Captain Lou Tirado  
Diamond Pass Outfitters  
9 Delaware Ave  
South Portland, ME 04016  
04106

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**From:** Victor Gano [<mailto:vgano@comcast.net>]  
**Sent:** Thursday, April 22, 2021 9:40 AM  
**To:** Comments <[comments@asmfc.org](mailto:comments@asmfc.org)>  
**Subject:** [External] Bluefish Allocation and Rebuilding Amendment

Hi,

I believe beach replenishment/beach nourishment is pushing bluefish further offshore. The army corps of engineers has destroyed fish habitat along the New Jersey coast from Long Beach island to Cape May Point. The army corps of engineers has done this year after year covering the jetties and covering the beaches with lifeless dead sand. Zero environmental impact is ever done and fish habitat continues to be destroyed year after year.

It is a billion dollar scam and the rich home owners and politicians are brain washed believing that moving sand from offshore to the coastal beaches will save a barrier island or peoples homes. It is a flat out lie. Follow the money trail and you will see the sea of lies behind beach replenishment. Environmental engineers have become environmental terrorists in my mind. I am sick of people like me being ignored year after year.

I have been fishing in South Jersey for over 40 years and I have never seen the fishing suck so bad along the South Jersey beaches.

Please help save fish habitat along our South New Jersey beaches.

**From:** Jeff Norton <user@voterveice.net>  
**Sent:** Friday, April 23, 2021 3:24 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Subject:** Bluefish Allocation and Rebuilding Amendment

Dear Mr. Seeley,

As an angler that loves sportfishing, I understand the responsibility of making tough management decisions to ensure the bluefish resource returns to a healthy status. Therefore, I support rebuilding the bluefish population using the following management actions.

Commercial/Recreational Allocations

I support Option 2a-3: 87% recreational, 13% commercial. This option uses the most recent 20 years of catch data (1999-2018) as opposed to the current allocation

Thank you for your time and consideration.

Sincerely,

Jeff Norton  
16 Wellingsley Ave  
Plymouth, MA 02360  
jeffnrtn@yahoo.com

**From:** Wesley Phillips <wesley@markjupiter.com>  
**Sent:** Friday, April 23, 2021 3:54 PM  
**To:** Seeley, Matthew <mseeley@mafmc.org>  
**Cc:** Leaning, Dustin Colson <dleaning@asmfc.org>; Davidson, Maureen <maureen.davidson@dec.ny.gov>  
**Subject:** Bluefish Allocation and Rebuilding Amendment

Dear Mr. Seeley,



I am a private recreational angler from NY writing to you regarding the Blue Allocation and Rebuilding Amendment because bluefish are an important part of not just my enjoyment of our coastline but of every anglers. They are fun to catch and on occasion, delicious to eat. It is important to me to see this fish stock rebuilt and maintained so they can continue to be enjoyed at sustainable levels for generations to come.

#### Fisheries Management Plans Goals and Objectives

I support the set of goals and objectives (**Alternative 1A**) but would like to see biennial analysis of the fishery to better understand the resource and the values that comprise it. This fishery is predominantly catch and release and depends heavily on the maximum sustainable amount of fish in the water. The socioeconomic effect should not be ignored.

#### Commercial/Recreational Allocations

I support **2a-4**. It represents data from higher biomass years as well as recent timeframes.  
I support **2b-1** because there is no, slow, phase-in.

#### Rebuilding Plan

The most critical part! It must be rebuilt quickly with the opportunity to still harvest as well as protect. I support **Alternative 4c**.

#### Quota Transfer Provisions

The primary value of this fishery is the catch and release of bluefish and not the harvest. **I recommend transfers be removed from consideration.**

#### Management Uncertainty

I support **6b, the post sector split**.

#### De Minimis

I support **7a**

Thank you for taking the time to consider my comments!

Sincerely,

Wesley Phillips

**From:** Parker Mauck <pgmauck@gmail.com>

**Sent:** Friday, April 23, 2021 4:47 PM

**To:** Seeley, Matthew <mseeley@mafmc.org>

**Subject:** Bluefish Allocation and Rebuilding Amendment

April 23, 2021

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

**Re: Bluefish Allocation and Rebuilding Amendment**

Dear Dr. Moore,

I am a proud member of the American Saltwater Guides Association (ASGA) a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of “better business through conservation,” reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Bluefish are a keystone species to recreational fishermen and our coalition, and we are thankful for the opportunity to comment on this amendment.

The bluefish fishery is predominantly recreational, as reflected by historic allocations and catch data. The 2018 revised Marine Recreational Information Program (MRIP) data resulted in recreational catch and harvest estimates much greater than previously believed. In August 2019, bluefish were declared overfished, although overfishing was not occurring. The Council adopted management measures to constrain the recreational sector in December 2019, but to the best of our knowledge bluefish remain overfished, current mortality levels are near overfishing levels, and recreational landings continue to exceed limits.

It is important to note that the recreational bluefish fishery, which makes up roughly 80-90% of historic mortality, is mostly a catch-and-release fishery. From 2010-2019, even with the federal bag limit at 15 fish per person with no size limit, Atlantic coast recreational anglers released about two thirds of the bluefish they caught annually.<sup>1</sup> This demonstrates that the recreational sector values the opportunity to repeatedly encounter bluefish, often more than intentionally harvesting them. The bluefish fishery thus represents a prime example of the value of fish left in the water.

We understand the “ebb and flow” nature of the bluefish stock but believe that there is a great opportunity to improve bluefish management. As such, it is imperative that the stock be efficiently rebuilt to best realize the value and benefits of the fishery.

Below are my views and the views of the ASGA on each of the issues contained in this amendment:

*Fishery Management Plan Goals and Objectives*

**We support the proposed set of goals and objectives (Alternative 1a).** However, we would like to suggest that the following objective be added: “Objective 2.3: perform biennial optimum yield analyses to better understand the resource and values therein.” MSA requires fisheries management measures to achieve optimum yield, which is defined as a fishery’s maximum sustainable yield “as reduced by any relevant economic, social, or ecological factor.”<sup>2</sup> Since catch-and-release fishing, which depends on lots of fish in the water, is such a major component of the recreational bluefish

fishery, its impact on optimum yield—namely, the socioeconomic benefits that come from reduced harvest and increased abundance—should not be ignored.

#### *Commercial/Recreational Allocations*

While we would normally support allocation based on catch rather than landings and one that solely uses baseline data from the most recent timeframes, **we support Alternative 2a-4 for the following reasons.**

At present, the bluefish stock is overfished, SSB has declined considerably since 2009, and there is a very strong possibility that overfishing occurred in 2019 and 2020. From a management perspective, we believe that base years should include timeframes when the stock was at historically abundant levels. The additional inclusion of recent timeframes will inform how the fishery is currently being utilized. The stock was at its largest in the early 1980s and experienced surges in 1999, 2003, and 2006. Alternative 2a-4 includes catch data from all of those high biomass years as well as landings data from more recent timeframes.

We do not support a phase in because the percentages included in the sub-alternatives would seem to have little real effect—**thus, for efficiency’s sake, we prefer Alternative 2b-1.**

#### *Commercial Allocation to the State*

We do not wish to offer opinions on the commercial fishery-focused alternatives within the document.

#### *Rebuilding Plan*

We strongly believe that the rebuilding plan is the most important component of this amendment. Legally, the Council must adopt a plan by November of this year and rebuild the stock by 2029. **We support Alternative 4c, which is based on the Council’s risk policy and projected to rebuild the stock within five years.** This alternative is precautionary to the resource while still providing some short-term opportunity for harvest. The bluefish fishery thrives when the stock is healthy, and rebuilding quickly is critical.

#### *Quota Transfer Provisions*

As highlighted above, the recreational bluefish fishery is a predominantly catch-and-release fishery that derives significant value from fish left in the water. We do not support the practice of transferring unused “quota” from the recreational sector to the commercial sector. Recreational anglers choose to release the majority of bluefish, indicating that the primary value of the recreational fishery is in encountering them and catching them—and more often than not, releasing them. Viewing intentionally released fish as unused quota and then transferring it to the commercial sector negates the conservation value of voluntary release practices and manifests a fundamental misunderstanding of the fishery. Additionally, the revised MRIP data tells us that many of the past recreational-to-commercial transfers should not have even occurred. Recreational anglers enjoy the opportunity to

encounter this fish and should not be punished for releasing them. We view transfers in this fishery as a form of dis-incentivizing the practice of catch and release that ignores the benefits it provides.

**For these reasons, we do not support either alternative, but rather recommend transfers be removed from the Bluefish Fishery Management Plan.**

#### *Management Uncertainty Alternatives*

We recognize the need for all fishery sectors to be held accountable, and while we understand the challenges in anticipating and monitoring recreational catch, the uncertainties that such challenges engender should not negatively impact the commercial sector. While we would like to learn more about the specifics of how recreational uncertainty will be considered in reducing recreational harvest limits, **we support 6b, the post-sector split.** In addition, we recommend that the Council support human-dimensions research concerning bluefish angler preferences and values, which could better inform future management decisions and more accurately predict recreational effort, an area of particular uncertainty.

#### *De Minimis Provisions*

*De minimis* states land less than 0.1% of the coastwide commercial landings for the year before, and the FMP does not subject these to recreational management measures. It is our view that these states contribute so minimally to the coastwide stock that additional measures are futile in practice. **Thus, we prefer the status quo option: 7a.** However, as currently written *de minimis* status is determined solely by commercial landings; we would be remiss to not highlight the opportunity for states to “game” this system as conservation equivalency has been used in other fisheries.

Thank you for providing all of the relevant information on this amendment and for considering our input. **I ask that you reflect on your responsibility and your opportunity to take actions that will MANAGE TO ABUNDANCE, which will help bluefish as a species, commercial anglers, recreational anglers, and the thousands of small businesses like mine that depend on the abundance of bluefish and other inshore fish species.**

Sincerely,

Parker G. Mauck  
Owner  
Westport Fly

Capt. Parker G. Mauck  
PO Box 42  
69 Masquesatch Road  
Westport Point, MA 02791  
[pgmauck@gmail.com](mailto:pgmauck@gmail.com)  
(508) 496-8682  
[www.westportfly.com](http://www.westportfly.com)

**277 identical or near-identical versions of the following comment were submitted. The names of the individuals who submitted this comment are listed below.**

Dear Mr. Seeley,

As an angler that loves sportfishing, I understand the responsibility of making tough management decisions to ensure the bluefish resource returns to a healthy status. Therefore, I support rebuilding the bluefish population using the following management actions.

**Commercial/Recreational Allocations**

I support Option 2a-3: 87% recreational, 13% commercial. This option uses the most recent 20 years of catch data (1999-2018) as opposed to the current allocation that uses outdated landings data from the 1980's.

**Commercial/Recreational Allocation Phase In** I support Option 2b-1: No Phase In. This allocation change does not need a phase in period because it differs by only 4% from the current allocation split. I also believe it is necessary to implement the allocation quickly to avoid any further recreational restrictions which could occur under a phased in approach.

**Rebuilding Plan Alternatives**

I support Option 4d: use constant fishing mortality to rebuild in a 7-year timeframe. It is uncertain whether fishing mortality or environmental conditions will have more of an impact on rebuilding the bluefish population. Scientists also think that recent changes in recreational catch data make it difficult to determine a rebuilding timeframe. All this uncertainty requires a longer rebuilding timeframe to provide the greatest opportunity to successfully rebuild bluefish.

**Quota Transfers**

I support Option 5a-2: allow for optional bi-directional transfers with Option 5B-2 a 10% transfer cap. Historically, transfers only occurred from the recreational fishery to the commercial fishery. If transfers are to be allowed, they should be bi-directional; however, I do not support transfers out of the recreational fishery until stock size has increased to a level that allows for equal measures between the for-hire and private modes.

**Management Uncertainty**

I support Option 6a: no action/status quo. The recreational sector has no ability to address the uncertainty association with recreational catch. Therefore, I believe management uncertainty should not be specific to each sector.

Thank you for your time and consideration.

Submitted by:

John Stillwagon, Jr., Jeff Miller, Phyllis Hamilton, Tony Sergi, Bruce Dana, Richard Terrazzino, Thomas Miloszewski, Dan Gallagher, Leoard McGill, Fred Johnson, Dave Beneway, Dennis Leon, John Higdon, Richard Lacafta, Ronald Lynch, Gary Johnson, William E. Burke, Andrew Roman, Thomas Wood, Alcides Vignolo, Paul Tomasura, Stanley Shenker, David Sams, Gary Harsel, Ken Allen, Rick Wakem, Ted Ring, Michael Avara, Al

Ristori, Perry Rease, George Ballard, Jim Reznik, Daniel McKee, Raymond Sales, Erik Nees, Nicholas Tinaro, Bryan Starke, Nicholas Passaretti, Anthony Cardwell, Ronald Audette, Steve Quigley, Robert Searles, Ben Yang, James Anderson, Scott Riddle, Richard Dowd, Vaughan Dize, Greg Lieb, Steven Fifer, Randy Sizemore, Roy Rhodes, Alex Gerus, Ronald Robichaud, George Fazio, Robert DeBonis, Tom West, Luis Sosa, Andrew King, Mike Piotrowski, Lewis Mitchell, Stephen Hiller, Claudio Ripoll, Joseph Vigorito, Ernest Mellon, Hayden Best, Leslie Hartman, Douglas Simms, Chris Carlson, Ronald Mazzarella, Allen Keith, Ron Broking, Kirk Fay, John Russell, Howard Smith, Charles Goins, Joseph Hughes, Emil Kolodi, Foyt Ralston, Michael Duclos, William Sciturro, Edward Richter, Michael Frybarger, Patrick Callahan, Robert Link, RJ Carl, Jerry Rau, William Byers, Bert Olmstead, Chris Edwards, Christopher Butler, Leo Sands, Bob Verge, German Forero, Daniel Kennedy, Christopher Detweiler, Keith Heiring, Warren Brown, Gary Coleman, Stephen Wuertz, David Anderson, Cy Pizam, John Gruber, Mark Vandebosch, Arthur Lewandowski, Jose Jaime, Philip Wrublewski, Frank DeCampra, Lynn Behler, John Peters, Richard Bielawiec, Mark Salopek, Joe Reustle, Carl Pearse, Robert Hawryluk, James Stauffer, Walter Fisher, Andrew Slousky, Brook Gabel, Richard Yates, Walter Everard, Tom Warman, Bradford Myers, Richard Pasko, Daniel Carney, Brian Toole, William Kazawic, Gary Akers, John Farrell, Gerald Clark, John Grida, Justice Rivera, Karen Gudzinski, Robert Haimelin, Martin Tait, Ben Speciale, Rick Holmberg, Russell Headley, David Nevin, Victor Regan, Enos Webster, Barry Moak, Joe Temple, Thomas Voltz, Dexter Grindstaff, Bill Bishop, Andrew Petersen, Thomas Gerrity, Michael Ebner, James Kiehnl, Deborah London, Cindy Galvin, Bruce Lawson, Chris Skibinski, Willie McCall, John Chandley, Michael Avara, Michael Wallick, Eric Morrow, Lester Pastewski, Walter Dudek, James Sanders, Patrick Bike, Reed Riemer, Michael Kenney, Chris Buck, Michael Rousseau, Michael Dorich, Jeff Hill, Don Goebel, Joseph Florek, David Pianki, Thomas Duncan, Joe Somers, Christopher DeFoe, Michael Norinsky, Jerry Negron, Paul Cavallaro, Robert Delark, Steven Free, Ralph Williams, Jim Wilkerson, David McCarty, David Hennessey, Robert Klapproth, Aaron Isban, Mark Kaspar, Larry Obuchowski, Maureen Hunt, Larry Rodriguez, Henry Massicotte, Phil Everingham, George Harkness, Stephen Lassiter, Jason Grieco, James Gorel, Mark MacDonald, Richard Rohloff, David Barrows, Michael Hennessey, Dave Kerrigan, Tom Palchanes, Charles Spindelman, Charles Addis, Frank Gundlach, Daniel Lesnieski, Charles Medlock, Alex Fernandez, Stephen Molo, Ronald Rupert, Robert burke, James Romeo, Howard Scheurenbrand, Theo Gionis, John Hooven, Robert Cuddy, Emil Borruso, Ronald Paffrath, Nick Fioravanti, Ed Giordano, Lou Di Bello, Emmett Luck, Steven Christensen, Thomas McGlynn, Debra McGlynn, Darryl Mosher, Michael Mascia, Chris Bartosh, John Lawson, Rob Kaluza, Joseph Gallinoto, Tibor Terek, John Davey, Jon Brunetti, Charles Seitzman, Gene Petit, Albert Conover, Eli Hamid, George Schnepf, Norman Hill, Todd McGonnell, Terence Glass, Doug McPherson, Paul Echavarria, Dennis ODriscoll, Michael DeLuca, Joe Meyer, Jerry Kells, Henry Elsesser, Mike Blaskovich, John Nardi, Terry Langer, Sean Shay, Craig Austin, Nick Murphy, Dan Rapolla, Bill Wrubel, Gerard Galluccio, Cristofer Pastore, Thomas C. Webster, Joseph Jordan, Howard Davis, Jim Foster, Michael Lambert, Matthew Anton, Robert Bennett, William Martin, Claudio Sala, Arthur Lewandowski, Charles Trowbridge, Ian Cochrane, Joel Huerta, Richard Trifone, Ed DeSanto, Robert Maynes, Rick Botoff, Paul Decoste, Francis Tierney, Howard Achilles, Chester Zegler

14 July 2020

To the Mid-Atlantic Fisheries Management Council,

My name is Dean Pesante, owner/operator of the F/V Oceana Inshore Gillnet Vessel based out of Point Judith, Rhode Island. I have been working as a commercial fisherman since 1984 and have captained my own vessel since 1991. On behalf of myself, other commercial fishermen, and shoreside dealerships and businesses throughout the state of Rhode Island, I am writing to you today to express my concern and request action be taken on issues pertaining to recent changes in Bluefish management. Specifically, I am referring to 1) quota distribution between commercial and recreational sectors and 2) commercial quota distributions between the Atlantic states. I am expressing my concerns because the new drastic cuts in quota for the commercial sector would create tremendous hardships for people in the Bluefish industry.

#### **Adjustment of Recreational and Commercial Quota**

Currently, Bluefish are in greater demand in the marketplace than they ever have been. More people are buying Bluefish every year, and they have become an extremely desirable fish to eat. The increasing demand for Bluefish has made the fishery more valuable and important to commercial fishermen and related businesses. Consequently, more commercial fishermen and related businesses have come to rely on this fishery and need an appropriate amount of quota to sustain their businesses.

Recent management measures have cut the commercial quota by more than 50%. These measures will create enormous financial and economic hardships for the commercial fishing industry. In keeping true to its mission of providing food to consumers, the commercial fishing industry is considered an essential business, and the reduction in quota will prevent the industry from operating sufficiently. It is important to understand that cutting the commercial Bluefish quota in half will have detrimental social and economic impacts as well as severely and directly hurt the livelihoods of Bluefish fishermen and associated businesses. In creating policies, please consider how you would feel if your income were cut in half.

The commercial fishery is managed with empirical data reported in a responsible manner under Federal and State Laws by both fishermen and dealers. ALL commercial fishermen provide accurate and realistic information to Federal and State entities. In contrast, recreational fishermen are not required by any law to report data nor any information. They only provide information voluntarily, and the data received from recreational fishermen is marginal at best. Because they are not regulated by Federal or State Laws, recreational fishermen that voluntarily report information have the ability to inflate data and exaggerate landings.

It is difficult to understand how such severe quota reductions to the commercial Bluefish industry were made with consideration to incredibly uncertain data from the recreational sector.

14 July 2020

For these reasons, we feel the Bluefish quota needs to be reallocated with a much higher percentage given back to the commercial industry.

#### **Adjustment of Commercial Bluefish Quota between Atlantic States**

The second issue I would like to discuss is the commercial Bluefish quota distribution between the Atlantic states. Evidence suggests the trend of both Bluefish populations and associated landings by commercial fishermen have changed immensely in recent years on the Atlantic coast. While the population of Bluefish and consequent landings have together increased significantly in northern Atlantic waters, the population and landings have decreased significantly in southern Atlantic waters. These changes are most likely due to climate change and water temperatures.

Southern states that currently have a larger percentage of Bluefish quota have consistently reported landings significantly below their allocation. The opposite is true in Northern states (New York, Rhode Island, and Massachusetts), who have consistently landed an amount of fish that exceeded their quotas. Consequently, northern States have had to request quota be transferred from the Southern states.

I believe an adjustment of quota allocation between the States should be made to accommodate the current state of the Bluefish population and landings. A more accurate and appropriate allocation of Bluefish quota is necessary.

Reductions in quota in the commercial Bluefish industry will have dire consequences for fishermen and related businesses. In this letter, I have proposed the following two solutions to resolve the current problems: 1) Reallocate quota from the recreational sector to the commercial sector and 2) Modify the percentage of commercial quota between Atlantic States to better represent the current trends in Bluefish populations and landings. Please consider these solutions and take prompt action.

Respectfully,

Dean Pesante

F/V Oceana





April 20, 2021

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

**Re: Bluefish Allocation and Rebuilding Amendment**

Dear Dr. Moore,

The American Saltwater Guides Association (ASGA) is a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of “better business through conservation,” reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Bluefish are a keystone species to recreational fishermen and our coalition, and we are thankful for the opportunity to comment on this amendment.

The bluefish fishery is predominantly recreational, as reflected by historic allocations and catch data. The 2018 revised Marine Recreational Information Program (MRIP) data resulted in recreational catch and harvest estimates much greater than previously believed. In August 2019, bluefish were declared overfished, although overfishing was not occurring. The Council adopted management measures to constrain the recreational sector in December 2019, but to the best of our knowledge bluefish remain overfished, current mortality levels are near overfishing levels, and recreational landings continue to exceed limits.

It is important to note that the recreational bluefish fishery, which makes up roughly 80-90% of historic mortality, is mostly a catch-and-release fishery. From 2010-2019, even with the federal bag limit at 15 fish per person with no size limit, Atlantic coast recreational anglers released about two thirds of the bluefish they caught annually.<sup>1</sup> This demonstrates that the recreational sector values the opportunity to repeatedly encounter bluefish, often more than intentionally harvesting them. The bluefish fishery thus represents a prime example of the value of fish left in the water.

We understand the “ebb and flow” nature of the bluefish stock but believe that there is a great opportunity to improve bluefish management. As such, it is imperative that the stock be efficiently rebuilt to best realize the value and benefits of the fishery.

Below are our views on each of the issues contained in this amendment:

**Fishery Management Plan Goals and Objectives**

We support the proposed set of goals and objectives (Alternative 1a). However, we would like to suggest that the following objective be added: “Objective 2.3: perform biennial optimum yield analyses to better understand the resource and values therein.” MSA requires fisheries management measures to achieve optimum yield, which is defined as a fishery’s maximum sustainable yield “as

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reduced by any relevant economic, social, or ecological factor.”<sup>2</sup> Since catch-and-release fishing, which depends on lots of fish in the water, is such a major component of the recreational bluefish fishery, its impact on optimum yield—namely, the socioeconomic benefits that come from reduced harvest and increased abundance—should not be ignored.

#### Commercial/Recreational Allocations

While we would normally support allocation based on catch rather than landings and one that solely uses baseline data from the most recent timeframes, we support **Alternative 2a-4 for the following reasons.**

At present, the bluefish stock is overfished, SSB has declined considerably since 2009, and there is a very strong possibility that overfishing occurred in 2019 and 2020. From a management perspective, we believe that base years should include timeframes when the stock was at historically abundant levels. The additional inclusion of recent timeframes will inform how the fishery is currently being utilized. The stock was at its largest in the early 1980s and experienced surges in 1999, 2003, and 2006. Alternative 2a-4 includes catch data from all of those high biomass years as well as landings data from more recent timeframes.

We do not support a phase in because the percentages included in the sub-alternatives would seem to have little real effect—thus, for efficiency’s sake, we prefer **Alternative 2b-1.**

#### Commercial Allocation to the State

We do not wish to offer opinions on the commercial fishery-focused alternatives within the document.

#### Rebuilding Plan

We strongly believe that the rebuilding plan is the most important component of this amendment. Legally, the Council must adopt a plan by November of this year and rebuild the stock by 2029. We support **Alternative 4c, which is based on the Council’s risk policy and projected to rebuild the stock within five years.** This alternative is precautionary to the resource while still providing some short-term opportunity for harvest. The bluefish fishery thrives when the stock is healthy, and rebuilding quickly is critical.

#### Quota Transfer Provisions

As highlighted above, the recreational bluefish fishery is a predominantly catch-and-release fishery that derives significant value from fish left in the water. We do not support the practice of transferring unused “quota” from the recreational sector to the commercial sector. Recreational anglers choose to release the majority of bluefish, indicating that the primary value of the recreational fishery is in encountering them and catching them—and more often than not, releasing them. Viewing intentionally released fish as unused quota and then transferring it to the commercial sector negates the conservation value of voluntary release practices and manifests a fundamental misunderstanding of the fishery. Additionally, the revised MRIP data tells us that many of the past recreational-to-commercial transfers should not have even occurred.

Recreational anglers enjoy the opportunity to encounter this fish and should not be punished for releasing them. We view transfers in this fishery as a form of disincentivizing the practice of catch and release that ignores the benefits it provides.

For these reasons, we do not support either alternative, but rather recommend transfers be removed from the Bluefish Fishery Management Plan.

Management Uncertainty Alternatives

We recognize the need for all fishery sectors to be held accountable, and while we understand the challenges in anticipating and monitoring recreational catch, the uncertainties that such challenges engender should not negatively impact the commercial sector. While we would like to learn more about the specifics of how recreational uncertainty will be considered in reducing recreational harvest limits, we support 6b, the post-sector split. In addition, we recommend that the Council support human-dimensions research concerning bluefish angler preferences and values, which could better inform future management decisions and more accurately predict recreational effort, an area of particular uncertainty.

De Minimis Provisions

*De minimis* states land less than 0.1% of the coastwide commercial landings for the year before, and the FMP does not subject these to recreational management measures. It is our view that these states contribute so minimally to the coastwide stock that additional measures are futile in practice. Thus, we prefer the status quo option: 7a. However, as currently written *de minimis* status is determined solely by commercial landings; we would be remiss to not highlight the opportunity for states to “game” this system as conservation equivalency has been used in other fisheries.

Thank you for providing all of the relevant information on this amendment and for considering our input.

Sincerely,



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Vice President and Policy Director  
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Willy Goldsmith, Ph.D.  
Executive Director  
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<sup>1</sup> Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, April 19, 2021.

<sup>2</sup> Magnuson–Stevens Fishery Conservation and Management Act, 16 U.S.C. § 1802 (2012).





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

April 22, 2021

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

RE: Bluefish Amendment

Dear Dr. Moore,

On behalf of the 60 members of the R.I. Party and Charter Boat Association, I would like to submit the following comments regarding the joint MAFMC/ASMFC Bluefish Amendment.

Regarding the Goals and Objectives, we support the proposed changes to the FMP goals and objectives. While we feel strongly that all user groups need to be treated with respect, we also "Fair and Equitable" should be clearly defined as it may mean different things to different people. Providing access to recreational fishermen who wish to fish home to eat is important for our businesses to survive and thrive.

**Section 5.0 Commercial/Recreational Allocations:**

Included within the alternatives of other commercial/recreational allocation actions has been an alternative that considers maintaining the current baseline years updated with new MRIP catch estimates. In this action, that alternative was not included, but we feel it should be a consideration for the council/board. In consulting with staff, we understand that an alternative using a catch-based approach with the baseline years of 1981-1989 would result in an allocation of approximately 90% recreational and 10% commercial. We would support that methodology and allocation formula if considered. As a second choice we would support Alternative 2a-2 as described in the public hearing document.

**Section 5.2 Allocation Phase-In:**

We support Alternative 2b-2: Allocation change spread evenly over the same time as the rebuilding plan.

**Section 6.0 Commercial Allocation to the States:**

Several RIPCBA members are dual permitted and hold both for-hire and commercial bluefish permits which allow them to prosecute a commercial blue fishery on days when they do not have a recreational for-hire trip scheduled. We support updating the timeseries used to determine state allocations. We support Alternative 3a-3 to accomplish this.

**Section 6.2 Commercial Allocation Phase-In:**

We support Alternative 3b-2: Allocation change spread evenly over the same duration as the rebuilding plan.

**Section 6.3 Commercial Triggers:**

We do not support using commercial allocation triggers due to unnecessary complexity created by triggers.

**Section 6.4.1 Minimum Default Allocations:**

We support Alternative 3d-2 0.10% Minimum Default Allocation

**Section 7.1 Rebuilding Plan Alternatives:**

We believe rebuilding of Bluefish should in accordance with the ABC Control Rule, guided by the Council's risk policy. We support Alternative 4c. In addition, we are opposed to Alternative 4b, a constant catch strategy that would rebuild in 4 years. The restrictive catch limits under this alternative are not worth the 1-year faster rebuilding schedule.

**Section 8.0 Quota Transfer Alternatives:**

Its hard for us to support transfers of quota while the stock is undergoing rebuilding. We recommend a pause on any transfers until rebuilding is complete. After that we would support a bi-directional transfer program of some type. A cap would be needed for transfers and a program would need to be developed that accounts for the variability in MRIP catch estimates. We recommend removing all transfers from the FMP and initiating an action to develop a transfer plan for implementation when rebuilding is complete.

**Section 9.0 Management Uncertainty Alternatives:**

Alternative 6b Post Sector Split allows for a targeted approach to accounting for management uncertainty. We believe this is the best and most fair way to go, potentially incentivizing each sector to address management uncertainty where it becomes problematic.

Respectfully Submitted,

*Capt. Rick Bellavance*

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

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April 22, 2021

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

RE: Bluefish Amendment

Dear Dr. Moore,

I am the owner/operator of the FV Priority Too, which holds a GARFO issued commercial fishing permit for bluefish. I have participated in this fishery for many years. I would like to offer the following comments related to the Bluefish allocation and rebuilding amendment.

**Section 6.0 Commercial Allocation to the States:**

I support updating the timeseries used to determine state allocations. I support Alternative 3a-3 as an appropriate way to allocate between states.

**Section 6.2 Commercial Allocation Phase-In:**

I support Alternative 3b-2: Allocation change spread evenly over the same duration as the rebuilding plan.

**Section 6.3 Commercial Triggers:**

I do not support using commercial allocation triggers due to unnecessary complexity created by triggers. They have not been used in this FMP in the past and I don't see a reason to start now.

**Section 6.4.1 Minimum Default Allocations:**

I support Alternative 3d-2 0.10% Minimum Default Allocation. If a fisherman from a state without allocation, harvests a few bluefish that fisherman should be able to bring them in and avoid discarding them. This alternative would give every state at least a little bit of allocation.

**Section 7.1 Rebuilding Plan Alternatives:**

I support rebuilding of Bluefish should in accordance with the ABC Control Rule, guided by the Council's risk policy. I support Alternative 4c. I do not support Alternative 4b, a constant catch strategy

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that would rebuild in 4 years. The restrictive catch limits under this alternative are not worth the 1-year faster rebuilding schedule.

**Section 8.0 Quota Transfer Alternatives:**

I support pausing any transfer of quota from one sector to another until the stock is rebuilt. During rebuilding, time should be given to develop a bi-directional transfer plan that meets the fisheries needs once stocks are rebuilt.

**Section 9.0 Management Uncertainty Alternatives:**

I support Alternative 6b Post Sector Split allows for a targeted approach to accounting for management uncertainty.

Respectfully Submitted,  
Capt. Rick Bellavance

Priority Fishing Charters  
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**CONSERVATION & PROTECTION OF MARINE LIFE**

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April 23, 2021

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

Dear Dr. Moore,

Thank you for the opportunity to comment on the Bluefish Allocation and Rebuilding Amendment. Coastal Conservation Association is the nation's largest marine conservation group, with over 100,000 members in 19 state chapters.

Bluefish are a popular species whose often vicious strike have saved many a fishing trip. While not favored for their dining quality, they are prized for their fighting abilities. They are typically abundant, which increases the encounter rate, and indiscriminate feeders, which increases the strike rate. In short, they are a prototypical recreational species and should be managed as such. Many are released alive to strike and fight another day.

We have always had a serious concern over the arbitrary transfer of unused recreational quota to the commercial bluefish fishery. The original bluefish allocation was 87% recreational to 13% commercial, which was not adhered to very often. It was set based on past catch history and clearly shows the predominance of recreational catch in the fishery. We are opposed to the concept of transferring quota, especially for bluefish which, as mentioned earlier, are primarily a recreational species. As such, fish left in the water have value, possibly more value than dead in a cooler.

There should be some economic analysis that compares the value of bluefish to the commercial fishery and to the recreational fishery, including the value of released fish, as another metric to help with allocation. Past catch history should not be the primary, let alone sole, metric to decide allocations.

If the Council and Commission believe the commercial fishery should have more fish, then they should make the case for a change in allocation.

**4.0 FISHERY MANAGEMENT PLAN GOALS AND OBJECTIVES**

We are in favor of the revised goals and objectives, though we would prefer language acknowledging the bluefish's importance to the recreational fishery and managing for abundance.



**5.0 COMMERCIAL/RECREATIONAL ALLOCATION ALTERNATIVES AND IMPACTS**

We are in favor of option 2a-2, 89% recreational to 11% commercial, simply because the additional fish available to the fishery were generated from the new effort estimation – the Fishery Effort Survey.

We are also in favor of 2b-1 – the No Phase in option.

**6.0 COMMERCIAL ALLOCATIONS TO THE STATES ALTERNATIVES AND IMPACTS**

We have no comment on the state-by-state commercial allocations.

**7.0 REBUILDING PLAN ALTERNATIVES AND IMPACTS**

Due to the uncertainty with factors affecting rebuilding, either fishing mortality, environmental factors or a combination of the two. When coupled with the recent changes in MRIP, rebuilding may take longer than expected. We are in favor of 4d – Constant Fishing Mortality – 7-year rebuilding.

**8.0 QUOTA TRANSFER ALTERNATIVES AND IMPACTS**

We are in favor of removing this Alternative from consideration. While we know this is nigh impossible, we are in favor of changing the current status quo to eliminate the possibility of in season quota transfers from the recreational fishery to the commercial fishery

**9.0 MANAGEMENT UNCERTAINTY ALTERNATIVES AND IMPACTS**

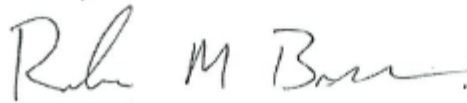
We are in favor of 6a – No Action. The recreational sector has very limited ability to address the uncertainty associated with recreational catch. Management uncertainty should not be specific to each sector.

**10.0 DE MINIMIS PROVISIONS ALTERNATIVES AND IMPACTS**

We are in favor of 7c – letting the state decide recreational management measures.

Thank you for the opportunity to provide comment on these issues.

Sincerely,



Richen Brame  
CCA Atlantic Fisheries Director

April 23, 2021

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

Dear Dr. Moore,

Thank you for the opportunity to comment on the Bluefish Allocation and Rebuilding Amendment. The Coastal Conservation Association North Carolina the largest marine conservation group in North Carolina with over 10,000 members and supporters across the state. We would like to add our support for comments already submitted by the CCA National office.

Bluefish are a popular species among recreational fishermen in North Carolina. Recent statistics from the NC DMF indicate it was the second most harvested fish by recreational anglers with over 2.7 million fish harvested in 2019. Many more were released alive to be encountered by anglers again another day. In short, they are a prototypical recreational species and should be managed as such.

We have always had a serious concern over the arbitrary transfer of unused recreational quota to the commercial bluefish fishery. The original bluefish allocation was 87% recreational to 13% commercial, which was not adhered to very often. It was set based on past catch history and clearly shows the predominance of recreational catch in the fishery. We are opposed to the concept of transferring quota, especially for bluefish which, as mentioned earlier, are primarily a recreational species. As such, fish left in the water have value, possibly more value than dead in a cooler.

There should be some economic analysis that compares the value of bluefish to the commercial fishery and to the recreational fishery, including the value of released fish, as another metric to help with allocation. Past catch history should not be the primary, let alone sole, metric to decide allocations.

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We are in favor of removing this Alternative from consideration. While we know this is nigh impossible, we are in favor of changing the current status quo to eliminate the possibility of in season quota transfers from the recreational fishery to the commercial fishery

#### **9.0 MANAGEMENT UNCERTAINTY ALTERNATIVES AND IMPACTS**

We are in favor of 6a – No Action. The recreational sector has very limited ability to address the uncertainty associated with recreational catch. Management uncertainty should not be specific to each sector.

#### **10.0 DE MINIMIS PROVISIONS ALTERNATIVES AND IMPACTS**

We are in favor of 7c – letting the state decide recreational management measures.

Thank you for the opportunity to provide comment on these issues.

Sincerely,

David A. Sneed, Executive Director  
Coastal Conservation Association North Carolina  
4809 Hargrove Road, Suite 123  
Raleigh, NC 27616



Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE 19901

April 22, 2021

Dr Christopher Moore,

The North Carolina Watermen United is submitting these comments regarding the bluefish fishery.

We believe that, though the statistics for the Charter/Headboat Sector are accurate because they are now being sent electronically, and the Commercial statistics are accurately recorded at the fish houses where the catch is sold, the Recreational numbers are incomplete.

The information from the Recreational Sector is not valid because neither the surveys nor the mail-in forms completely show the true number of fishermen on private boats, the true number of on-shore anglers or the accurate number of fish that have been caught. Although the Marine Recreational Intercept Program (MRIP) has been in place for a few years, and is highly touted by Recreational fishing magazines, the program needs refinement and much better distribution, so that the actual number of fishermen and their catches is included.

Until we have better accounting from the Recreational Sector, including private boat catches and much more reliable surveys of the private on-shore anglers, it is just an arbitrary exercise to "make up" rules and regulations that effect all three Sectors of fishermen.

We are asking that MAFMC and ASFMC address this problem immediately so we can get accurate an accounting for the bluefish fishery.

Thank you for your attention to this matter.

Yours truly,

*Perry Wood Beasley*

Perry Wood Beasley  
President, NCWU  
252-706-0184

PWB: mm

cc: NC Division of Marine Fisheries

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# DIRECTED SUSTAINABLE FISHERIES, INC. A SALTWATER FISHERIES CONSULTING COMPANY

23 APR 2021

Re: BLUEFISH Allocation and Rebuilding Amendment Comment

To: Matt Seeley (mseeley@mafmc.org)

Thank you for the opportunity to provide comment on behalf of Directed Sustainable Fisheries, (DSF) clients concerned about current Bluefish Amendment Actions

Below is an image of the Bluefish Amendment Proposed Actions Overview, and the proposed actions, following that will be the intent of the DSF Bluefish written Comment;

The Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission (Commission) are seeking public comment on management options under consideration in the Bluefish Allocation and Rebuilding Amendment. This amendment contains alternatives to:

- Revise the fishery management plan (FMP) goals and objectives;
- Modify the bluefish allocations between the commercial and recreational sectors;
- Modify the commercial allocations to the states;
- Initiate a rebuilding plan;
- Revise the quota transfer processes;
- Revise how the FMP accounts for management uncertainty; and
- Revise the *de minimis* provisions in the Commission's FMP.

Comments may be provided at any of 5 virtual public hearings to be held between **March 24** and **April 8, 2021** or via written comment until **April 23, 2021**.

DSF provided oral comment on behalf of the Florida Atlantic Bluefish Fishery on 24 March 2021. Below will be DSF comments with the proposed actions, and maybe some general comment besides supporting the Florida Atlantic Bluefish fishery.

## FMP Goals and Objectives Action 1.

DSF unfortunately agrees that the Bluefish FMP process has now tasked the two fishing sectors with probable allocation changes through these proposed management actions, using these current projections, since Status Quo does not seem to be a real option anymore for the present commercial sector allocations by States. This is after the past year or more of the public process of the commercial sector pushing against the new MRIP FES "currency" data shift from the old MRFSS "currency" that now inflates the previously already massive recreational sector estimated catch and mortality rates.

This current action of replacing the historic assessment inputs by changing current allocations between the commercial and recreational sectors has unfortunate consequences overall for the commercial sector of Florida, and elsewhere on the Atlantic coast for commercial interests due to

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1



the new "MRIP FES currency" that we do not entirely agree with the estimated and inflated past catches by the recreational sector, yet it will take several years to verify or deny the veracity of the new method MRIP FES methods (currency) of estimating recreational catch of Bluefish. Meanwhile the commercial Bluefish seafood clients are denied past access, and the recreational "fishing public" gets to play with their Bluefish seafood, and release the majority of the greatly expanded estimated catch, many to die and become a modeled dead discard input in the future Bluefish stock assessments. For two years we have opposed the MRIP FES for various reasons, especially since it is not a real census of the catch like commercial fishing has been, it is only an estimate, albeit a greatly expanded recreational mortality going into the future that will always be a year to two years behind as to final annual catch, landings and release mortality. Even the Florida Fish & Wildlife Conservation leadership does not trust the results from the MRIP FES for many of the Florida fish stocks.

#### Sector (Commercial/Recreational) Allocations Action 2.

For sector allocation Set 2a, we would prefer to stay with Alternative 2a-1, Status Quo 83% Recreational and 17% Commercial. With that said managers do not seem inclined to help the commercial maintain the percentage previously allocated, so our secondary choice will be Alternative 2a-5, 84% Recreational and 16% Commercial.

Alternative Set 2b is the Allocation Change Phase-In as worded in the Bluefish public hearing document, then as long as Action 1 unfolds as we desire, then no-phase in, Alternative 2b-1, Status Quo should be okay. Some of this will depend on the future allocations and which rebuilding plan duration choice is implemented.

#### Commercial Allocations to the States Action 3.

Florida Bluefish interests would prefer Alternative 3a-1 of Status Quo, (1981-1989) that maintains the Florida current commercial percentage of 10.04%. Since managers will probably not agree to that choice, then our back up will be Alternative 3a-4 that uses half of 1981-1989 and half of 2009-2018 to achieve 8.59% that keeps Florida commercial Bluefish allocation closest to the past allocation of Status Quo.

Alternative Set 3b-1 No phase-in Status Quo is the best commercial choice as long as the maximum two allocations can be available to Florida commercial fishermen.

Alternative Set 3c-1 of no Quota trigger, Status Quo has been the Bluefish FMP norm, and we support the continued status quo.

Alternative Set 3d-1 of No Minimum Default Allocation Status Quo for Bluefish is probably the best choice, unless one of the two other allocations work out best for states like Georgia and South Carolina that doesn't harvest much commercial Bluefish historically.

#### Rebuilding Plan Action 4.

Alternative Set 4-d for Constant Fishing Mortality for a 7-year Rebuilding Plan is the favored choice by the Florida Atlantic Bluefish fishing industry. This will reveal how well the Bluefish population status is unfolding for both fishing sectors.

# DIRECTED SUSTAINABLE FISHERIES, INC.

## A SALTWATER FISHERIES CONSULTING COMPANY

### Transfers Action 5.

We support the continued inclusion of Sector Transfer Provisions as a tool to keep in the FMP for potential future use. Alternative Set 5a-1 No Action/Status Quo is the Florida choice, though in our commercial history, we have never required a transfer to Florida, but Florida did benefit northern states in the past by giving transfers to help their fishing interests.

### Management Uncertainty Action 6.

Since Figure # 21 in the public hearing document illustrates some of the new FMP choices, with suggestions including the transfers that could in the future get activated in both directions for commercial and recreational potential utilization. Also, developing types of a census approach for the for-hire and private recreational fisheries in all the states that catch and land Bluefish. We can support Alternative Set 6-b for Post-Sector split, and we can only hope that Scientific, Commercial and Recreational Uncertainties can be reduced in the future with better data collection.

### De Minimis Provisions Action 7.

Atlantic Florida Recreational fishing interests for Bluefish have a robust fishery in state and federal waters that depends on certain migrations based on available food sources for the Blues usually affected by water temperatures and the weather patterns that sometimes have Bluefish being pulled further or closer to the beach creates some variations on annual catch & landings. Particularly the past two falls and winters have impacted a lot of fishing efforts from all sectors since 2019. We cannot control the effects of Mother Nature on Bluefish, only the catch. Managers are in charge, and for now we will simply choose Alternative Set 7-a No Action/Status Quo, and let management make these final choices after recreational inputs.

### General.

It is still our desire to see ultimately a census gathering effort for both the for-hire and private recreational sectors to provide these data, instead of depending only on a MRIP FES that is an estimate of an estimate that hurts the commercial sector with these actions of this proposed FMP.

Thank you, again, and we hope you help the Florida commercial Bluefish fishery, and not harm its recent positive growth over the past decade.

*Rusty*

Russell Howard Hudson, President  
Directed Sustainable Fisheries, Inc. (DSF)

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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, 1958-2021  
Sixth Generation Waterman from Central Florida (FL) East Coast  
Seafood Coalition (SFC) member  
American Elasmobranch Society (AES) member 2004-2021  
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  
IWMC World Conservation Trust Vice-President – Marine Fish Species, especially Sharks  
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 2021-2026  
South Atlantic Fishery Management Council (SAFMC) SEDAR AP Pool member no term limits  
SAFMC Fisheries Citizen Science Program Participant 2016-2021  
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 & 2019-2021.  
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 (Atlantic Red Snapper/~~Gray Triggerfish~~), 50 (Blueline Tilefish), 53 (Red Grouper), 54 (Sandbar Sharks), 56 (Black Sea Bass), 65 (Atlantic Blacktip Sharks), 66 (Golden Tilefish) 73 (Atlantic Red Snapper) and SEDAR 78 (Atlantic Spanish Mackerel).





April 23, 2021

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

Dear Dr. Moore,

On behalf of the recreational fishing industry, and east coast anglers, we submit the following comments to the Mid-Atlantic Fisheries Management Council (MAFMC) and the Atlantic States Marine Fisheries Commission (ASMFC) on the Bluefish Allocation and Rebuilding Amendment.

Recreational anglers and the sportfishing industry recognize that a healthy bluefish population and fishery is critical to the east coast outdoor economy and is a significant driver of angler engagement and participation in coastal states from Maine through Florida. As a sportfish, bluefish provide fishing opportunities across all modes of the recreational sector making it an important target for a diverse and growing population of recreational anglers.

Historically, management of the bluefish fishery has been exceptionally stable until the 2019 operational assessment concluded that bluefish were overfished and experiencing overfishing during a significant part of the time series. These results were based mainly on the inclusion of updated MRIP catch data and represent a significant shift from the previous understanding of stock status. Unfortunately, this means that a rebuilding plan is now needed to return the bluefish population to a healthy status.

Furthermore, managers are currently using the new MRIP data in every aspect of fisheries management except for allocation. National standard 2 guides the use of best scientific information available in management decisions. Therefore, we recommend the MAFMC and ASMFC adjust the recreational and commercial allocation splits for the bluefish fishery using the new MRIP data which has been deemed best scientific information available.

To help assist the MAFMC and ASMFC in responding to these substantial changes in stock status and the need to revisit allocation, we submit the following comments on the Bluefish Allocation and Rebuilding amendment.

#### Goals and Objectives

We support the revised goals and objectives but recommend adding an objective under Goal 1 about the importance of maintaining management stability in the bluefish fishery.

#### Commercial/Recreational Allocations:

We support Option 2a-3: 87% recreational, 13% commercial.

**Justification:** This option uses the most recent 20 years of catch data (1999-2018) which is a broad timeframe that better reflects ongoing changes in the overall fishery. Using catch data as the basis for

allocation will correct the current mismatch that exists where landings data are used for allocation, but catch data are used for accounting. Additionally, the recreational sector remained within its recreational harvest limit over the entire 20-year timeframe (1999-2018) providing a fair and equitable basis for using these years in the allocation calculation.

#### Commercial/Recreational Allocation Phase In

**We support Option 2b-1: No Phase In.**

**Justification:** The 87% recreational, 13% commercial allocation change does not need a phase in period because it differs by only 4% from the current allocation split. We also believe it is necessary to implement the allocation change quickly to avoid any further recreational restrictions which could occur under a phased in approach.

#### Rebuilding Plan Alternatives

**We support Option 4d: use constant fishing mortality to rebuild in a 7-year timeframe.**

**Justification:** It is uncertain whether fishing mortality or environmental conditions will have more of an impact on rebuilding the bluefish population. Although maintaining fishing mortality at the target level will be of paramount importance, even the stock assessment scientists expressed concern with the recent changes in recreational catch data making it difficult to determine a rebuilding timeframe with certainty. Furthermore, it is difficult to understand that over the entire time series (1985-2018), bluefish spawning stock biomass (SSB) has never reached the SSB target. We value the health of the bluefish stock and understand that rebuilding it has measurable benefits to our industry, but express continued concern regarding choosing an overly ambitious rebuilding timeframe that requires rebuilding to a level that has never been achieved.

Also, the Draft Amendment states that if the stock is unable to rebuild in a chosen timeframe that NOAA Fisheries technical guidance on MSA National Standard 1 recommends that the rebuilding fishing mortality proxy (F) be set at 75% of the target F. This means that if the selected rebuilding plan is demonstrating difficulty in achieving the target on time, F may be further decreased to achieve a rebuilt stock.

Given the uncertainty associated with the rebuilding timeframe projections and the potential for further restrictions if the projections are inaccurate, we strongly recommend a longer rebuilding timeframe to provide the greatest opportunity to successfully rebuild bluefish.

#### Quota Transfers

**We support Option 5a-2: allow for optional bi-directional transfers with Option 5B-2 a 10% transfer cap.**

**Justification:** We do not support quota transfers between sectors while the population is under a rebuilding plan. Additionally, we do not support quota transfers between sectors until both the for hire and private modes have equal management measures. Because eliminating quota transfers is not a management alternative in the document, if quota transfers are allowed, they need to be bi-directional with a 10% transfer cap.

Management Uncertainty

We support Option 6a: no action/status quo.

**Justification:** The recreational sector has no ability to address the uncertainty associated with MRIP catch estimates, but we continue to advocate for better catch reporting systems. Additionally, the public hearing document does not provide any information on the level of uncertainty that may be applied through Alternative 6b or how such an application of management uncertainty would impact recreational regulations for this fishery. Therefore, we believe management uncertainty, which is controlled by the managers not the stakeholders, should not be specific to each sector.

Thank you for the opportunity to comment.

Sincerely,

Michael Waine  
Atlantic Fisheries Policy Director  
American Sportfishing Association

Jeff Angers  
President  
Center for Sportfishing Policy

Chris Horton  
Senior Director of Fisheries Policy  
Congressional Sportsmen's Foundation

Clay Crabtree  
Director of Federal Government Relations  
National Marine Manufacturers Association

Jim Donofrio  
President  
Recreational Fishing Alliance



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<p><b><u>Officers</u></b> Capt. Michael J. Pierdinock President</p> <p>Capt. Paul Diggins Vice President</p> <p>Capt. Rick Golden Secretary</p> <p>Debora Holt Treasurer</p> <p><b><u>Board of Directors</u></b> Capt. John Bunar</p> <p>Capt. Jeff Depersia</p> <p>Capt. William Hatch</p> <p>Capt. Eric Morrow</p> <p>Capt. Damon Sacco</p> <p>Capt. Tim Brady</p> <p><b><u>Trustees</u></b> Capt. Tom Depersia</p> <p>Capt. David Waldrip</p> <p>Capt. Charlie Wade</p> <p>Capt. Peter Murphy</p> <p>Capt. Brian Curry</p> <p>Capt. Robert Savino</p> <p>Capt. John Richardson</p>	<p>April 23, 2021</p> <p>Chris Moore, Ph.D., Executive Director Mid-Atlantic Fishery Management Council 800 North State Street, Suite 201 Dover, Delaware 19901</p> <p><b>RE: <u>Bluefish Amendment</u></b></p> <p>Dear Dr. Moore:</p> <p>On behalf of the Stellwagen Bank Charter Boat Association (SBCBA) whose membership includes the for hire fleet, recreational anglers and commercial fisherman that fish the state and federal waters off the coast of Massachusetts and abutting states, we offer the following comments to the Mid-Atlantic Fisheries Management Council (MAFMC) and Atlantic States Marine Fisheries Commission (ASMFC), Bluefish Allocation and Rebuilding Amendment.</p> <p>A healthy bluefish population and fishery is critical to anglers and the entire blue economy of Massachusetts and the east coast. Bluefish provide fishing opportunities across a cross section of the recreational community making it an important target for a diverse and growing population of anglers.</p> <p>The management of the bluefish fishery has been stable until the 2019 operational assessment concluded that bluefish were overfished and experiencing overfishing. This is primarily a result of updated MRIP data. Consistent with National Standard 2, the use of the best scientific information available and/or updated MRIP data is required to manage the fishery. As a result, the SBCBA recommends that the MAFMC and ASMFC adjust the recreational and commercial allocation for the bluefish fishery using the new MRIP data consistent with the recommendations summarized below.</p> <p><b><u>Commercial Recreational Allocations:</u></b> <b>Recommend Option 2a-3: 87% recreational, 13% commercial.</b></p> <p>This option uses the most recent 20 years of catch data (1999-2018) that reflects the ongoing change in the overall fishery over time. Using catch</p>
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data as the basis for allocation will correct the current mismatch that exists where landings data are used for allocation, but catch data are used for accounting. It should also be noted that the recreational sector has remained within its recreational harvest limit over the entire 20-year timeframe (1999-2018) providing a fair and equitable basis for using these years in the allocation calculation.

Commercial/Recreational Allocation Phase In  
**Recommend Option 2b-1: No Phase In.**

A phase in period is not recommended since the 87% recreational and 13% commercial allocation differs by only 4% from the current allocation split. The SBCBA believes it is necessary to implement the allocation change quickly to avoid any further recreational restrictions which could occur under a phased in approach.

Rebuilding Plan Alternatives

**Recommend Option 4d: use constant fishing mortality to rebuild in a 7-year timeframe.**

MSA section 304(e)4 details the requirements for rebuilding overfished fisheries and allows for exemptions to the "as short as possible" requirement to account for the "interaction of the overfished stock of fish within the marine ecosystem." As a result, the SBCBA is disappointed that a 10-year rebuilding option was not selected to rebuild the fishery. It is uncertain whether fishing mortality or environmental conditions will have more of an impact on rebuilding the bluefish population. Maintaining fishing mortality at the target level will be very important. It should be noted that during the entire time series (1985-2018), the bluefish spawning stock biomass (SSB) has never reached the SSB target. The SBCBA has continued concern associated with selecting an overly ambitious rebuilding timeframe that requires rebuilding to a level that has never been achieved.

As a result of the uncertainty associated with the rebuilding timeframe projections and the potential for further restrictions if the projections are inaccurate, the SBCBA strongly recommends a longer rebuilding timeframe to provide the greatest opportunity to successfully rebuild bluefish.



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Quota Transfers

**Recommend Option 5a-2: allow for optional bi-directional transfers with Option 5B-2 a 10% transfer cap.**

The SBCBA does not support quota transfers between sectors while the population is under a rebuilding plan. If quota transfers are allowed, the SBCBA recommends a bi-directional transfer with a 10% transfer cap.

Management Uncertainty

**Recommend Option 6a: no action/status quo.**

The recreational sector has no ability to address the uncertainty associated with MRIP catch estimates. The greatest proportion of uncertainty in the recreational bluefish fishery is associated with the estimates of discarded fish. Estimates of discards rely on angler recall which inherently contains more uncertainty.

The public hearing document does not provide information on the level of uncertainty that maybe applied through Alternative 6b or how such an application of management uncertainty would impact recreational regulations. As a result, the SBCBA recommends that the management of uncertainty be conducted by the fishery managers not the stakeholders across all sectors.

If you have any questions or comments please email or give me a call.

Very truly yours,

*Capt. Mike Pierdinock*

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Cc: Dan McKiernan, MassDMF  
Ron Amidon, MassF&G

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