



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: Summer Flounder, Scup, and Black Sea Bass Management Board and Mid-Atlantic Fishery Management Council

FROM: Caitlin Starks, ASMFC FMP Coordinator; Savannah Lewis, ASMFC FMP Coordinator; Julia Beaty, MAFMC Staff

DATE: November 18, 2020

SUBJECT: Public Comment on Black Sea Bass Draft Addendum XXXIII

The following pages represent a summary of all comments received by ASMFC and the Mid-Atlantic Fishery Management Council (Council) on Black Sea Bass Draft Addendum XXXIII and the Council Amendment on black sea bass commercial allocation as of 5:00 PM (EST) on November 13, 2020 (closing deadline). Comment totals for the Addendum and Amendment are provided in the tables below, followed by summaries of the state public hearings, and letters sent by organizations and individuals. Please note a summary was not provided for the Virginia, Rhode Island, and Massachusetts public hearings as no public comment was given. Additional comments were submitted and are summarized below and included in the attached comments and public hearing summaries.

A total of 17 written comments were received on Draft Addendum XXXIII and the Council Amendment from individuals and organizations. Four organizations and 13 individual stakeholders and members of the commercial fishing industry submitted comments on the Addendum and Amendment.

Seven public hearings were held via webinar for individual or multiple states: Massachusetts, Rhode Island, Connecticut and New York, New Jersey, Delaware and Maryland, Virginia and North Carolina. 62 individuals are estimated to have attended the hearings, and an estimated 13 of these individuals provided comments pertaining to Draft Addendum XXXIII and the Council Amendment.

The following tables (pages 2-5) are provided to give the Board an overview of the support for specific management options contained in Draft Addendum XXXIII and the Council Amendment. The counts for each state were tallied based on the state an individual identified as being from rather than the webinar the individual attended. This was done because of some combined state webinars and the ability of participants to attend webinars for different states.

Public Comment Summary Tables: Draft Addendum XXXIII and Council Amendment

<i>Allocation Approaches</i>						
	Option A	Option B	Option C	Option D	Option E	Option F
<i>Written Comments</i>	Status Quo	CT 5%	DARA	Trigger	CT NY Trigger	Percentage
Individual	9	1		1	1	
Organization			1			
Form Letter						
<i>Public Hearings</i>						
MA						
RI						
CT		7				
NY						
NJ	1					
DE	2					
MD						
VA	1					
NC	1					
Total	14	8	1	1	1	0

<i>C. DARA Sub-options</i>									
	Final Weights		% change per adjustment		Frequency of adjustments		Regional allocation adjustment cap		
<i>Written Comments</i>	C1-A	C1-B	C2-A	C2-B	C3-A	C3-B	C4-A	C4-B	C4-C
Individual									
Organization	1		1			1			
Form Letter									
<i>Public Hearings</i>									
MA									
RI									
CT	1		1		1				
NY									
NJ									
DE									
MD									
VA									
NC									
Total	2	0	2	0	1	1	0	0	0

D. Trigger Approach Sub-options								
Written Comments	Trigger Value		Surplus Distribution		Regional Distribution		Static/Dynamic Base Allocations	
	D1-A	D1-B	D2-A	D2-B	D3-A	D3-B	D4-A	D4-B
Individual		1		1	2			
Organization								
Form Letter								
Public Hearings								
MA								
RI								
CT		1						
NY								
NJ								
DE								
MD								
VA								
NC								
Total	0	2	0	1	2	0	0	0

F. Percentage Approach Sub-options						
Written Comments	Percentage initial		Remaining % distribution		Regional distribution	
	F1-A	F1-B	F2-A	F2-B	F3-A	F3-B
Individual						
Organization						
Form Letter						
Public Hearings						
MA						
RI						
CT						
NY						
NJ						
DE						
MD						
VA						
NC						
Total	0	0	0	0	0	0

G. Regional Configuration		
	Option G1	Option G2
Written Comments	2 regions	3 regions
Individual	1	
Organization		1
Form Letter		
Public Hearings		
MA		
RI		
CT		
NY		
NJ		1
DE		
MD		
VA		
NC		
Total	1	2

3.2 Federal Management Options				
	Commission Only vs Council & Commission Management		Sub-options: Paybacks under Council FMP	
	Option A	Option B	Option B1	Option B2
Written Comments	Status Quo	Council & Commission	Status quo	Always
Individual	1	3	1	1
Organization	4	1	1	
Form Letter				
Public Hearings				
MA				
RI				
CT	1			
NY				
NJ				
DE				
MD				
VA				
NC				1
Total	6	4	2	2

3.2.2 Federal In-season Closures			
	Option A	Option B	Option C
Written Comments	Status Quo	Quota + 5%	ACL
Individual	2		
Organization			
Form Letter			
Public Hearings			
MA			
RI			
CT			
NY			
NJ			
DE			
MD			
VA			
NC			
Total	2	0	0

Additional Comments:

The majority of individuals that commented were frustrated with the complexity of the document, and were concerned that they were not able to provide better comments. One specific comment was that the options were too complicated to even consider, and that they involve counting and redistributing fish with no consideration for peoples’ livelihoods. Most of the individuals that expressed frustrations also supported status quo.

Fourteen individuals endorsed status quo because of fears of overfishing and undercounting of fish, because the quota is still being caught in states that would lose quota, and based on the rationale that the biomass has not shifted north but rather expanded. There was also concern about commercial quota being moved to states that allow for recreational industry participants to buy state license authorizations to sell black sea bass.

One individual from New Jersey expressed that they would like to keep status quo because all of the other options steal quota from New Jersey. They stated that in the past New Jersey gave away a portion of its allocation to other states that requested it, even with a strong commercial fishery. This was done without the input of the commercial fishery, and the industry does not want to give up any more.

A few individuals were concerned about the timing of this addendum, and expressed that this is not the year to change things. They prefer to maintain status quo until economic impacts for commercial fisherman can be discussed.

Some individuals and the Atlantic Offshore Lobstermen’s Association support revising state-based allocations due to unnecessary discard driven by a distribution shift and small quotas. Black sea bass are often bycatch in lobster pots, and the commercial industry would rather land them than throw them back.

Four participants indicated that the MAFMC should have more of a role in managing quotas than they currently do, while six individuals wanted only ASMFC to play a role in managing quota. Support for more MAFMC involvement comes from the thought that the majority of black sea bass landings come from federal waters, so it should be under federal oversight. Support for ASMFC was mainly because of the flexibility of management and concern about increased complexity under federal administration.

The Town Dock, based in Rhode Island, supports option C, the DARA approach, because it is flexible and shifts the quota to where the fish are. It is also based on science and is fair and equitable. However, one individual expressed strong opposition to the DARA approach, citing that it is too overcomplicated and political.

Eight participants from Connecticut supported the increase to Connecticut quota. They supported this option based on increases in the amount of fish they are seeing, but they do not have the quota to land the fish. One individual mentioned seeing 10 times as many fish as he did 30 years ago, and another mentioned he had not seen so many fish in his life. A few others supported the increase because of the increased habitat and prey provided by the offshore wind farms. Another individual from Connecticut did not support the DARA approach because of a hesitation to change base allocations. He expressed support for the trigger approach because it could benefit low quota states without destabilizing norms.

Two commercial fishery participants from the southern region indicated the importance of the black sea bass fishery to themselves and their region. They say that it is one of the few fish that can be landed year round, and is often bycatch for other species. For example, in Maryland the black sea bass fishery supports commercial fisherman and local fish houses.

General Comments on Fishery Management:

One public comment suggested dramatically reducing the overall commercial harvest.

A few participants commented on the financial impact of ITQs on the rest of the fishery. With no landing limits, several ITQ permit holders land tens of thousands of pounds in a single day, flooding the markets. This disrupts the market and reduces the price for non-ITQ states.

One individual provided several comments on the SAW/SARC process, including considerations for essential fish habitat, human environmental stressors on habitat, climate change, shifts in the food chain, and socioeconomic considerations for black sea bass.

The East Hampton Fisheries Advisory Committee commented that they want more information on how historical allocations were made in states, and were unable to endorse any option because of this. They hope that any plan selected does allow for the East Hampton harvesters to maintain if not expand the fishery.

One individual wants to know if northern states will be giving back their commercial permits to southern states, because the historic landings for northern states can be directly traced back to southern boats.

One individual brought up the idea of a quota bank, where states that do not harvest their full quota can put unused quota into a bank. States would be able to pull from this bank the following year if they needed additional quota.

Addendum XXXIII Public Hearings

Virginia Webinar Hearing

October 8, 2020

1 Public Participant

Public: Sara Gibbs (Undergraduate - Northeastern)

Commissioners/Council Members: Chris Batsavage (NC), Pat Geer (VA), Michelle Duval (MAFMC)

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Alexa Kretsch (VA), Alan Bianchi (NC), Jill Ramsey (VA), Shanna Madsen (VA), Julia Beaty (MAFMC)

Only state and federal agency staff, commissioners and council members, and one undergraduate student attended. No comments were given.

Addendum XXXIII Public Hearings
North Carolina Webinar Hearing
October 13, 2020
4 Public Participants

Public : Peter Consiglio, Harry Doernte (VA), Mark Hodges (VA), Julie Evans (NY)

Commissioners/Council Members: Chris Batsavage (NCDNR), Pat Geer (VMRC), Sonny Gwin (MAFMC), Tony DeLernia (MAFMC), Dewey Hemilright (MAFMC)

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Alexa Kretsch (VMRC), Alan Bianchi (NCDNR), Michelle Duval (MAFMC), Julia Beaty (MAFMC), Meredith Whitten (NCDNR), Shanna Madsen (VMRC), Brandi Salmon (NCDNR), Lorena de la Garza (NCDNR)

Four members of the public were on the webinar hearing. There were few comments and questions, mostly coming from a member of the public and advisors for the MAFMC. All active participants expressed concern over the complexity of the document. One member of the public and one advisor supported status quo for the commercial fishery because of the importance of the black sea bass fishery to the region.

Public Comment Summary

Mark Hodges (Commercial fishery participant, VA)

- Supports status quo because they believe that the stock has only expanded and not shifted north because they have reported more fish this fall than in prior years.
- Believes that the northern states are taking commercial quota and then turning it into recreational quota.
- Worried about more quota going to states that have lower trip limit fisheries.
- Voiced support for B2, saying that states should payback overages no matter what. Believes that when states go over quota it hurts the market for the other states.
- Expressed concern about the complexity of the document.

Dewey Hemilright

- Voiced concerns over the complexity of the document, and that participants need additional time to review options and provide comments. Concerned that the document may be too complicated for fishermen.

Sonny Gwin (Commercial fishery participant, MD and DE)

- Noted that the black sea bass is probably one of the most important commercial fisheries in federal waters, and it is the only fish landed year round, 12 months out of the year.
- Indicated that webinar's do not feel the same as in person, and that information is not as readily absorbed.

Addendum XXXIII Public Hearings
Maryland and Delaware Webinar Hearing
October 14, 2020
2 Public Participants

Public: Wes Townsend (DE), James Fletcher (NC)

Commissioners/Council Members: Mike Luisi (MD), John Clark (DE), Sonny Gwin (MAFMC), Michelle Duval (MAFMC)

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Steve Doctor (MD), Jason Boucher (DE), Erik Zlokovitz (MD), Alan Bianchi (NC), Angel Willey (MD)

Two members of the public participated. There were a few questions clarifying the DARA approach, but the participants expressed concerns over the impact removing quota from Maryland and Delaware would have on the commercial fisheries there.

Public Comments

Wes Townsend (commercial industry participant, DE & MD):

- Taking quota away from Maryland and Delaware would create hardships for the fishery.
- Wanted to know why the historical allocations looked so low with the DARA approach, and had specific questions about Option C1-C and Option D. Concerned that DARA didn't credit the historical fishery enough.
- Expressed support for *Option A, Status Quo*, because black sea bass is the biggest fishery Delaware and Maryland have and the commercial industry is still catching their quotas.

James Fletcher (representing the United National Fisherman's Association, NC):

- Disagreed with the heavy use of acronyms.
- Wanted to know if the northern states would be giving the southern states back their quota and permits. He thinks they should at no cost to southern boats. Historic landings for northern states can be traced back to southern boats.
- Expressed concerns over the NMFS survey, that it doesn't sample a key location of rocks 50 fathoms north of Norfolk Canyon.
- Wants to know what NMFS doesn't require electronic reporting of black sea bass in the EEZ.
- Expressed support for *Option A, Status Quo*, on behalf of himself and the United National Fishermen's Association.
- Recommended that if the council or ASMFC does anything to change the quota and move it north, then commercial trawlers that lost permits due to the cuts in quota have a chance to get them back. Many of the boats in their region had given up their permits because they could no longer afford them due to the expense of the permits and too low of a quota to make enough money.

Addendum XXXIII Public Hearings
Connecticut and New York Webinar Hearing
October 15, 2020
12 Public Participants

Public: Daniel Malone (CT), Gary Yerman (CT), Joesph Gilbert (CT), Robert Smith (CT), Roy Miller, Sid Holbrook (CT), Michael Plaia (CT), Joel Lizza (CT & NY), Peter Consiglio (CT), DJ King (CT & NY), Julie Evens (NY)

Commissioners/Council Members: Tony DiLernia (MAFMC), Wes Townsend (MAFMC), Emerson Hasbrouck (ASMFC), Dan Farnham (MAFMC), Michelle Duval (MAFMC), Maureen Davidson (NY), Justin Davis (CT)

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Colleen Bouffard (CT), John Maniscalco (NY), Matthew Gates (CT), Renee St. Amand (CT), Alan Bianchi (NC), Greg Wojcik (CT)

Comments were made by 11 participants. The overall consensus was the more black sea bass are being seen now than ever, and Connecticut needs more quota. Participants agreed that the biomass was expanding into the northern waters, and that the fish are established. Some members mentioned that they want ASMFC to have full control over black sea bass.

Comments Related to State Allocation Options

Michael Plaia (Advisor from Connecticut):

- Thinks that the Council should stay out of the process because it makes it too unwieldy. ASMFC should have sole decision making power.
- Has not seen this many sea bass ever. It's not a migration, but they are breeding in the canyons offshore and are now native fish. It is an expanding biomass, and ASMFC needs to recognize that.

Peter Consiglio (Commercial trap fishery participant, Connecticut):

- The water temperatures in July and August are a booming time to catch black sea bass. They need higher quotas in the spring and summer time because they are doing more damage throwing fish overboard than landing them.
- Over the years, there has been a rise in juvenile black sea bass and now they are seeing marketable fish. Now they are breeding

Robert Smith (Commercial fishery participant, Connecticut):

- Supports an increase quota for Connecticut, and thinks that there should be individual triggers for recreational and commercial quotas.

Joel Lizza (Commercial fishery participant, Connecticut and New York):

- 30 years ago, he didn't see black sea bass in New York, but now he can catch hundreds of pounds in a day. Fish are showing up mid sound in Gilford, both in New York and Connecticut waters. Late May to early July, they are seeing more and more bass each year until mid-August. This year they have seen 10x more than they used to see. Concerned about the increase in black sea bass predation on lobster.

Sid Holbrook (Commercial fishery participant, Connecticut):

- Support for Connecticut to get at least 5%, if not more. Also expressed support for *Options C1-A, C2-A, C3-A, and D1-B*.
- Supports yearly increases and the tie between assessments. Also expressed concern of predation on lobsters by black sea bass.

DJ King (Commercial fishery participant, Connecticut and New York):

- Temperature shifts have increased the amount of black sea bass than historically landed, and we need an increase in allocation, at least double what is available now. There isn't a lot of quota available to catch, and they need to make it a target fishery like the southern states.

Joseph Gilbert (Commercial fishery participant, Connecticut):

- Supports giving Connecticut more quota, along with New York. Historical landings have biased the system, and he would like to land fish in his state instead of other states.
- Wants to take unused quota to benefit other states.
- Windfarms are creating more habitat for black sea bass and their prey, and it will bring more fish their way.

Tony DiLernia (Advisor, New York):

- Document was difficult to get through.
- Question about whether the stock was shifting north or the range was expanding.
- Thinks that the level of black sea bass has leveled off south of Hudson Canyon but isn't decreasing.
- Participated in an offshore wind seminar that found black sea bass were eating crabs found on the windfarms rather than lobsters.

Julie Evans (Representative of the East Hampton Fishery Advisory Committee):

- Wanted to know why states that had historically overfished their quotas were getting other states allocations, specifically the New Jersey allocation. New Jersey had to borrow from other states.
- If one state goes over, will other states be impacted?
- Plans on providing written comment

Daniel Malone (Commercial fishery participant, Connecticut):

- Agrees with several comments, and will spend more time reading the document before providing written comment.
- Would like to see the quota adjusted every year
- Does not want NOAA involved in any way because they take too long to get anything done, and he likes the state flexibilities.
- Has also seen the increases in black sea bass, and would be happy with 5% but doesn't think that is enough for Connecticut. Thinks it should be up near 11% or 12%.

Gary Yerman (Commercial fishery participant, Connecticut):

- Believes that a minimum of 5% is on the small side, and it should be more like 10%.
- If they have all of the black sea bass and other states aren't catching all of their quota, then why can't we have a quota bank that states can borrow from? States aren't utilizing their quota, so it should carry over is not used and go into that quota bank.

Addendum XXXIII Public Hearings

New Jersey Webinar Hearing

October 27, 2020

7 Public Participants

Public: Scot Mackey (NJ), Jeff Kaelin (NJ), Mike Plaia, Carl Howard (NJ), Greg DiDomenico (NJ), James Lovgren (NJ), Michael Monteforte (NJ)

Commissioners/Council Members: Joe Cimino (NJ), Anthony DiLernia (MAFMC), Adam Nowalsky (Council/ASMFC), Dan Farnham (MAFMC), Michelle Duval (MAFMC), Peter Clarke (MAFMC), Nichola Meserve (Commission),

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Chad Power (NJ), Heather Corbett (NJ), Jeffrey Brust (NJ), Joshua O'Connor (NOAA), Mike Celestino (NJ), Alan Bianchi (NMFS)

Seven members the public attended the hearing. Five attendees said the document was complex, and they would be providing written comment after taking more time to review. Four participants had questions about stock distribution, focusing on whether the stock had shifted or was expanding. Participants also asked for more examples of state quotas under different scenarios. One participant provided comment, below.

Public Comment Summary

James Lovgren (Commercial fishery participant, NJ):

- Supported *Option A, Status Quo*, but recognized that probably will not happen.
- Strongly opposed to *Option C, DARA Approach*, because it is overcomplicated and political.
- The main issue from the New Jersey standpoint is that New Jersey should not take any cuts to their allocation. New Jersey had previously given up 10-18% of the quota to other states in the original amendment, and they should not lose anymore.
- Would like more involvement of the MAFMC because the large majority of black sea bass are caught in federal waters.
- Supported *Sub-option G2*, for New Jersey as a separate region, because the biomass is centered off New Jersey.
- Claimed that most fish landed in southern states are actually caught in the waters off of New Jersey to Rhode Island, and asked for the Council and Commission to look at where the boats are harvesting fish compared to where they land the fish.
- Expressed dislike of ITQ fishery systems, and suggested that the Council and Commission move quota to active fisheries instead of inactive ITQ fisheries with latent quota.
- Wanted to know where the majority of black sea bass were actually being caught and what states the boats were landing in.

Addendum XXXIII Public Hearings

Rhode Island Webinar Hearing

October 28, 2020

5 Public Participants

Public: Christopher Sarro, Kate Almeida, Michael Monteforte, Roy Barlow, Thomas Heimann

Commissioners/Council Members: Eric Reid (RI), Dan Farnham (MAFMC), Michelle Duval (MAFMC),

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Alan Bianchi (NMFS), Jason McNamee (RI), John Lake (RI), Scott Olszewski (RI), Nichola Meserve (MA), Corinne Truesdale (RI)

Five members the public attended the hearing. No participants provided comments. One question was asked about the process for approval of the addendum, which staff will follow up.

Addendum XXXIII Public Hearings

Massachusetts Webinar Hearing

October 29, 2020

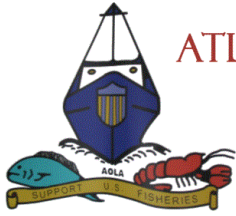
2 Public Participants

Public: Michael Pierdinock (MA), Luciano Mascari (MA)

Commissioners/Council Members: Nichola Meserve (Board), Raymond Kane (Board), Chris Batsavage (Board-NC), Mike Armstrong (Board), Michelle Duval (MAFMC), Dan Farnham (MAMFC)

Staff: Caitlin Starks (ASMFC), Savannah Lewis (ASMFC), Sam Truesdell (MADMF), James Cullen (MA), Alan Bianchi (NC DMF), Jared Silva (MA)

Two members the public attended the hearing. No participants provided comments. One participant had a question about clarifying the difference between the trigger approach and the percentage approach. A Commissioner had a question about how the trigger would work, and who would vote on it. A member of the public wanted to know if minimum sizes would increase in the state of Massachusetts.



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

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October 8, 2020

Caitlin Starks, FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, VA 22201

Dear Ms. Starks,

I'm writing as representative of the Atlantic Offshore Lobstermen's Association to provide comments toward the Commission's Draft Addendum XXXIII to Black Sea Bass Commercial Management. As noted in our scoping document comments, our primary interest in this issue relates to black sea bass (BSB) being unavoidable bycatch in lobster gear, as most of our members do not directly target the species.

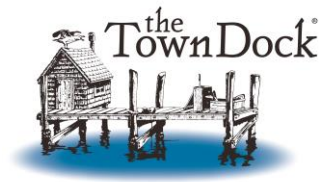
The Association supports revising BSB state-based allocations. Since implementation of static state-based allocation management in 2003 the species distribution has shifted considerably and small quotas in some states coupled with increased BSB abundance creates unnecessary discard. These discards could be avoided if the quota system was realigned in response to shifting distributions.

As to specific management approaches, the Association supports a solution that strikes a balance between historic allocations and current biomass, while also considering recent trends in fisheries utilization, discards, and fleet capacity. The approach should be dynamic, or at a minimum, static allocations should sunset after 2-3 years to prevent this issue arising again. The approach should readjust coastal state allocations to reflect local abundance and include provisions to shift allocations to the more southern states if the current trends reverse. If an approach is selected that will reduce states' quotas below historic landings, adjustments should be made incrementally to minimize financial disruption.

As to including state specific commercial allocations in the federal FMP managed by MAFMC and NOAA, we don't think it is warranted or valuable at this time. We believe it's unnecessary given that the Mid-Atlantic states are well represented on the ASMFC's BSB Board, giving them control of the vote if they choose to exercise that prerogative. We also note that there are no members of the New England states on the Mid-Atlantic Council, so it is hard to envision how New England fishermen would be able to provide meaningful input into the Council process. Finally, shifting interstate quota transfers from Commission to NOAA Fisheries purview would certainly make in-season management more difficult and less flexible. We have no objections to inclusion of the federal managers in deliberations on coastal allocation issues, but duplicate and redundant regulations are unwarranted.

Thank you for the opportunity to comment.

Heidi Heninger
Program & Science Manager



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November 5, 2020

Caitlin Starks, FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, VA 22201

Dear Ms. Starks,

Please find below our preferred alternatives for the Black Sea Bass Commercial State Allocation Amendment.

The Town Dock prefers the Alternative C, the Dynamic Adjustments to Regional Allocations (DARA) approach. This approach is extremely flexible and shifts the quota to where the fish are. Not only is this approach based on science, but it is also both fair and equitable, not showing favorability to one state over another.

Under Alternative C we support the following sub-options:

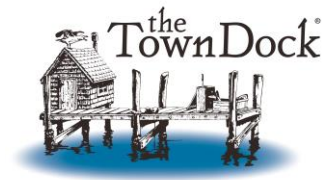
1. Sub-Alternative C1-A. At the end of the transition phase the allocations will be based on 90% of the stock distribution and 10% on the initial allocation. This alternative ultimately reaches the goal of this Amendment, by allocating the quota to where the stock is distributed.
2. Sub-Alternative C2-A. This alternative would favor a slower transition of 5% per adjustment. This would allow for markets and processors to absorb any changes that will come with any changes in quota.
3. Sub-Alternative C3-B. Under this Alternative, adjustments to the allocations and stock distribution would occur every other year. This is the slower of the two adjustment rates, but for the same reasons I stated in C2-A it gives markets and processors time to absorb any changes.

Under Alternative G we support the following Sub-Alternative:

1. Sub-Alternative G2. This Alternative would create three regions 1) ME-NY, 2) NJ and 3) DE-NC.



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Regarding 3.2.1 Alternatives for adding allocations for adding state commercial allocations to the FMP we support Alternative A: Status Quo, that the commercial state allocations included only in the Commissions FMP. If the MAFMC should become involved there would be a requirement for joint action on issues. This makes discussion and voting more complicated and complex. How allocations are handled now is efficient and should remain as such.

Thank you for taking the time to consider our recommendations.

Sincerely,

Katie Almeida
Fishery Policy Analyst



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Comments

From: Julie Evans <jevansmtk@gmail.com>
Sent: Friday, November 13, 2020 8:18 PM
To: Comments
Subject: [External] Black Sea Bass Addendum XXXIII

The East Hampton Fisheries Advisory Committee has considered the ASMFC and MAFMC Draft Addendum XXXIII/Black Sea Bass Commercial State Allocation Amendment and makes the following comments and observations. It is hard to endorse the expansion of any particular plan option when there is considerable concern about the way the historic allocations were made in NYS and in the other states. The EHFAC would prefer to have this information before committing to any particular allocation scheme that becomes part of the ASMFC or the MAFMC fishery management plan or becomes a component of any new regulation or layer of government focusing on adding the burden of more regulation on the fishing industry. The new proposals are intriguing however and the dynamic allocation partially based upon regional stock distribution and partially based upon historic allocation may eventually rise to the top as an idea worth considering. However, we are not there yet as a committee ready to endorse this or any other of the options. It is our hope as the biomass moves northward that a plan which allows our East Hampton fishermen to maintain if not to expand this fishery in order to feed both the economic needs of industry and to consistently meet the demand to supply wild seafood to the people without disruption. This statement was written on behalf of the EHFAC by Capt. Julie Evans who was recently appointed and now officially represents the EHFAC.

Caitlin Starks

From: Beverly Lynch <braelynch@gmail.com>
Sent: Thursday, September 10, 2020 9:56 AM
To: Comments
Subject: [External] black sea bass addendum XXXIII

We are for Option I, Status Quo.

Of all years to change anything! The markets disrupted, quotas not landed and fishermen suffering. How many fishermen are going to be able to use these webinars?

Your science shows a decline in seabass spawning stock biomass in the north since 2014. (figure I) By the time you change quotas, sea bass stock will have changed.

You shouldn't take quota from fishermen who have been landing it (until this awful year) and depending on it and give it to someone else who has never landed it.

Your alternatives are too complicated to even consider. They involve counting and redistributing fish with no consideration of people's livelihoods. Fish move and so do boats.

State quotas were a bad idea. Quotas should be allocated to individual fishermen as was done in Maryland, Delaware and Virginia. These individual quotas should be federal.

Beverly R. Lynch
Edward T. Smith

Painter, VA

Caitlin Starks

From: ejcpoker@aol.com
Sent: Thursday, September 10, 2020 5:31 PM
To: Comments
Subject: [External] Black Sea Bass regulations

It seems as soon as the fishing populations start increasing , people want to increase the allocations. The reason and purpose of the increase was because of the strict regulations. The populations have not bounced back to previous levels prior to the year 2000. Please don't change anything!

Caitlin Starks

From: Jean Public <jeanpublic1@yahoo.com>
Sent: Monday, September 14, 2020 11:34 AM
To: Caitlin Starks
Subject: [External] Fw: ASMFC and MAFMC Schedule Public Hearings on Draft Addendum XXXIII/Black Sea Bass Commercial State Allocation Amendment - public comment on your below proposals

----- Forwarded Message -----

From: Jean Public <jeanpublic1@yahoo.com>
To: Mid-Atlantic Fishery Management Council <contact@mafmc.org>; comments@asmfc.org <comments@asmfc.org>; cstark@asmfc.org <cstark@asmfc.org>; information@sierraclub.org <information@sierraclub.org>; info@epwtrusts.org <info@epwtrusts.org>; info@peta.org <info@peta.org>; katherine.schatzmann@hsus.org <katherine.schatzmann@hsus.org>; info@idausa.org <info@idausa.org>; info@cok.net <info@cok.net>; info@nyclass.org <info@nyclass.org>; westchesterhumane@gmail.com <westchesterhumane@gmail.com>
Sent: Monday, September 14, 2020, 01:04:17 PM EDT
Subject: Re: ASMFC and MAFMC Schedule Public Hearings on Draft Addendum XXXIII/Black Sea Bass Commercial State Allocation Amendment - public comment on your below proposals

we should not increase any takings or harvesting. we need to cut the entire harvest down to 1,000 mt. that should be the limit of commercial fishing. all states should get an equal amount. they then can trade among themselves. that is the fairest way. this is my comment for the below proposed policy. this comment is for the public record. please receipt. jean public jean public1@yahoo.com

On Wednesday, September 9, 2020, 01:01:47 PM EDT, Mid-Atlantic Fishery Management Council <contact@mafmc.org> wrote:

View this message in your [browser](#)



September 9, 2020

Comments

From: info
Sent: Monday, November 2, 2020 9:31 AM
To: Comments
Subject: FW: Thank you for attending Black Sea Bass Addendum XXXIII Public Hearing (October 2020)

From: michael monteforte [mailto:mike.monteforte@hotmail.com]
Sent: Friday, October 30, 2020 6:02 AM
To: info <info@asmfc.org>
Subject: [External] Re: Thank you for attending Black Sea Bass Addendum XXXIII Public Hearing (October 2020)

Good morning

The whole issue with black Seabass is very important to me, because it is one of my primary fisheries. To that point, to further understand what is about to happen to this fisheries by way of an increase or decrease, I felt it necessary to attend the meeting. I thought it would be complicated so I listened to the same program in New Jersey and in my home state of Rhode Island. I still am not sure of what direction I would support, because I still do not fully understand The proposal.

I continued to fish for black sea bass this whole year. There seems to be a huge biomass of Seabass and an abundance of small recruitment Seabass in our area. Which I find very encouraging. The webinar program was very well done!

Thank you for making the future changes to the Fisheries regulations available to me and other fisherman.

Have a great day!

Michael Monteforte

On Oct 29, 2020, at 8:01 PM, Webinar Staff 2 <customercare@gotowebinar.com> wrote:

We hope you enjoyed our webinar.

Please send your questions, comments and feedback to: info@asmfc.org.

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This email is sent on behalf of the organizer by GoToWebinar.

Comments

From: Jean Public <jeanpublic1@yahoo.com>
Sent: Monday, November 9, 2020 5:37 PM
To: Comments; cstark@asmfc.org; tina.berger@mafmc.org
Subject: [External] Fw: Reminder: Nov 13 Deadline to Submit Comments on the Draft Addendum XXXIII/Black Sea Bass Commercial State Allocation Amendment

the present quota should be cut by 50% immediately to prevent overfishing. the population needs to be sustainable. the commercial fishing fleet steals and you have such little amount of law enforcement you don't catch any of it. and they are killing dolphins and other animals because they eat fish. this comment is for the public record. please receipt. jean public1@yahoo.com

----- Forwarded Message -----

From: Mid-Atlantic Fishery Management Council <contact@mafmc.org>
To: "jeanpublic1@yahoo.com" <jeanpublic1@yahoo.com>
Sent: Monday, November 9, 2020, 03:13:09 PM EST
Subject: Reminder: Nov 13 Deadline to Submit Comments on the Draft Addendum XXXIII/Black Sea Bass Commercial State Allocation Amendment

View this message in your [browser](#)



November 9, 2020

Reminder: Submit Comments on the Draft Addendum XXXIII/Black Sea Bass Commercial State Allocation Amendment by November 13

As a reminder, the deadline to submit public comments on the Atlantic States Marine Fisheries Commission's Black Sea Bass Draft Addendum XXXIII and the Mid-Atlantic Fishery Management Council's Black Sea Bass Commercial State Allocation Amendment is this **Friday, November 13, 2020, 11:59 p.m. (EST)**. The draft amendment and addendum propose alternative approaches for allocating the coastwide black sea bass commercial quota among the states. This action also considers changes to federal regulations and Council management of state allocations.

Comments

From: Paul <tok67@verizon.net>
Sent: Tuesday, November 10, 2020 8:13 AM
To: Comments
Subject: [External] Black Sea Bass Addendum XXXIII

Good morning ,

My recommendation is to leave the status QUO for all states and Quota's. I also suggest allowing the sea bass to be added to the federal multi species A & B licenses

Thank for reading

Paul

Comments

From: David Duncan Dow <ddow420@comcast.net>
Sent: Wednesday, November 11, 2020 6:12 PM
To: Comments
Cc: David Duncan Dow
Subject: [External] Black Sea Bass Addendum XXXIII

I am a retired marine scientist and grassroots environmental activist living on Cape Cod and wanted to submit comments on the Black Sea Bass Commercial State Allocation Amendment. Black Sea Bass (BSB) and Summer Flounder are moving into Nantucket Sound, while Winter flounder & American lobster are moving either further offshore or Northeastwards into the Gulf of Maine. There has been a shift in forage fish prey as sea herring population has collapsed and is being replaced by menhaden and other forage species from the Mid-Atlantic region (which are used as lobster pot bait). Since the Atlantic States Marine Fisheries Commission and Mid-Atlantic Fishery Management Council manage Black Sea Bass throughout their range, the commercial allocations will have to be increased in southern New England. Since I retired from the Northeast Fisheries Science Center's Woods Hole Laboratory in 2009, I don't know enough about the status of the commercial fishery for Black Sea Bass in state/Federal jurisdictional waters to make specific suggestions on how the commercial allocations should be divided in face of the COVID-19 Pandemic health and socioeconomic crises.

Instead I plan to focus my comments on SAW/SARC process which develops the quota for Black Sea Bass and the "Productive Capacity" of Essential Fish Habitat for this species. I was the Recreational Fisheries Coordinator in the Northeast for a number of years and attended the Stock Assessment Workshop/Stock Assessment Review Committee meetings for key recreational species. In addition, I served on the New England Fishery Management Councils Habitat Plan Development Team which helped developed Omnibus Habitat Amendment 2 which was released in 2018. I also participated in the EMaX (Energy Modeling & Analysis Exercise) project which developed a carbon flow model for the Northeast Continental Shelf Ecosystem. Finally I have read the Executive Summary of the Ecosystem Status reports for the Mid-Atlantic and New England Regions which discussed human stressors like warming waters; increased ocean acidity and ocean noise; conflicts from other human uses like ocean wind farms (with 20 to be built between North Carolina and New England between now and 2030); shifts in managed species and their prey in space and time which influence recruitment; growth and natural mortality in stock assessment models and allocations in the catch quotas between state (0-3 miles)/Federal (3-200 miles) jurisdictional waters and Massachusetts Ocean Management Plan (0.3-3 miles).

Interactions between "Nitrogen Enrichment"; warming waters; increased ocean acidity and periodic anoxia in bottom waters during the Summer have effected coastal finfish/shelfish habitats in coastal embayments adjacent to Nantucket Sound (i.e. Waquoit Bay watershed) and Cape Cod Bay (killing lobsters in their pots). It is not apparent to me that the NOAA Fisheries SAW/SARC process includes these human environmental stressors in the stock assessments that provide the basis BSB commercial quotas. For example, climate change effects the base of the marine pelagic food chain (microbial and grazing food chains)

& top down shifts in predation/competition as fish species and their prey shift in space/time. The current population dynamic models assume that the age structure of the managed fish populations will reflect the effects of climate disruption in the COVID-19 era when the Bottom Trawl Surveys no longer take place.

As someone who led two Task Forces on the NEFSC Monitoring & Ecosystem Survey programs, this doesn't appear to be a sound assumption. The same is true for the assumption that the "Natural Mortality" component is constant in the midst of these human based stressors. The BOEM Cape Cumulative Environmental Impact Assessment of the proposed 20 wind farms indicated potential effects on "Fisheries Management". The Ecosystem Status reports indicate that shifts in the pelagic food chain will decrease the yield of Living Marine Resources as community respiration increases in a longer food chain (something born out in the EMaX model). Thus the SAW/SARC quotas should be viewed with caution from my perspective.

Essential Fish Habitat for pelagic species needs to be modified to include the shifts in the food chain which reduce the yield of managed species. As the BOEM MV Wind Supplemental EIS pointed BSB should benefit from the structures provided by ocean wind farms being constructed in Southeastern New England (which would support increasing the commercial catch allocation locally). NOAA Fisheries assumes that ocean wind farms will negatively affect most pelagic fish stocks. When I lived in Slidell, La many saltwater anglers used offshore oil/gas platforms to fishing sites (in spite of periodic spills and fires). You might want to consider an adaptive, ecosystems-based management approach (a, EbM) to explore the consequence of shifts in the ecosystem which influence BSB and other pelagic target species. This would include both bottom-up and top down shifts in EFH. There needs to be shifts in the NEFSC Monitoring and Ecosystem Surveys To support the a, EbM (return continuous plankton surveys to the Gulf of Maine from vessels of opportunity or increased use of drones/underwater submersible vehicles like the North Atlantic right whale surveys around a wind farm off the coast of New Jersey).

The one final point is that the socioeconomic studies on commercial fishing should include Environmental Justice issues in coastal communities and ecological economics considerations on the effects of fishing on marine biodiversity and marine natural capital/ecosystem services. Here on Cape Cod we are losing our working waterfront to other non-water related activities which will make it hard to continue commercial fishing into the future for smaller vessels. When I worked at the Fisheries Lab, I chaired a Gulf of Maine Council on the Marine Environment Task Force on Fisheries & Aquaculture and we developed indicators on the Economic Multiplier Effects at the County level throughout New England. This might help preserve the Working Waterfronts in small towns from inroads of tourist-based enterprises as young people move to cities/suburban areas for better job opportunities. It is not easy to buy a house or rent a year round apartment here on Cape Cod, even if you work for the Federal Government. There is a Woods Hole Diversity Advisory Committee that provides input to the scientific institutions on EJ concerns locally. Roughly 35% of the employees at the Fisheries Lab in Woods Hole are contractors who require housing. When I worked at NASA's Earth Resources Laboratory at the Stennis Space Center in Mississippi we had 3-4 contractors for every civil servant. It is likely that the post-COVID 19 world will feature more contractors replacing civil servants/full time employees with salaries & benefits

Thanks for your consideration of these comments.

Dr. David D. Dow
East Falmouth, Ma.

Comments

From: Jim Dawson <jimdawson1@verizon.net>
Sent: Wednesday, November 11, 2020 6:29 PM
To: Comments
Cc: ELLEN BOLEN; Jill Ramsey
Subject: [External] James Dawson black sea bass comments

Importance: High

I am a commercial “full time” black sea bass fisherman 12 months out of the year. You all may check that I personally may be the ONLY fisherman who fishes for them and places black sea bass on the market 12 months in a year.

- 1.) My vessels are “forced” to maintain records by “VTR”. If anyone would just check these records and my own records to verify that the black sea bass population has grown and “expanded” in ALL areas. Our catch records “VERIFY” this.
- 2.) Mark Hodges records in Virginia Beach will also verify that our catch has substantially increased, not that they have moved north, but the overall stock size has expanded as our catch data verifies as FACT!
- 3.) Several northern states had a problem with catching their quota for 2020 which has not happened in the past, indicating a possible “peak” in the northern states stock size.
- 4.) “Jumbo bass” have not been as prevalent within the marketplace also indicating a northern fishery peak and year class loss not seen and as noticeable until 2020. This indicates “overfishing” within the northern states fishery and biomass.
- 5.) Our stock size within the southern “Mid Atlantic states” have lost over 90% of the sea bass “set gear” which has allowed our southern stock and biomass to dramatically increase. VTR records verify these statements as FACT.

Please do NOT allow adjustments that have serious and life altering impacts such as we have already witnessed currently in 2020. Increasing quotas and allocations simply lowers market prices and causes more pressures on fishermen and the species! We would ALL be better off fishing for less fish at a higher market price. More fish would then be available to each sector of fishermen. It is and has been a very bad decision to raise the quota levels and these decisions came from those currently attempting to make this one! Today, 11-11-2020, the price offered at the dock for a black sea bass fell below \$1.00 to the boat! This fact crushes the “small fishermen” and we feel as though it may be by design. Yes, our stocks ARE growing, but damn, give them a chance to grow, you all did a good job and were slowly increasing the amounts. This doubling the amount and also not giving things until halfway through the year has caused difficulties that I believe SHOULD BE discussed MUCH further with respect to “economic impacts” that “legally” our commission and council members MUST follow.

At this point until those economic impact statements from fishermen such as myself are followed and received by each fisherman, we should stay at a “status quo” until we can discuss what impacts everyone has gone and suffered through.

I CANNOT agree that the overall stock has “moved north”. My catch records verify that it has not and I personally have caught MORE than my own personal quota since Virginia started a historically based IFQ system. This fact alone indicates what Jimmy Rhule has stated over and over: “The sea bass stock has simply expanded in size, it has not moved”.

Jim Dawson
Chincoteague, Virginia.

Comments

From: JACK STALLINGS <vagrumpy@aol.com>
Sent: Friday, November 13, 2020 9:11 AM
To: Comments
Subject: [External] Black Sea Bass Addendum XXXIII

I have been involved in the commercial BSB fishery since 1973, so about 47 years. It will take me at least that long to understand what I just tried to read in the 59 page amendment you posted.

Keep the quota Status Quo!

Thank you,

Jack Stallings

Virginia Beach, Va

Sent from my iPad

Comments

From: Joe <jdelcampo@cox.net>
Sent: Friday, November 13, 2020 2:37 PM
To: Comments
Subject: [External] Bsb management plan

My name is Joe Del Campo. I have been in the black sea bass fishery since the 1980s. I fish in the state of VA. I choose status quo for section 3.1 option A.

If you choose a trigger management plan I choose option D1-B which uses a trigger of 4,500,000 pounds. Section 3.2 I choose option A status quo.

Under Sub alternative I choose option B-2 where states always pay back their overages Section 3.2.2 I choose option A. Status quo no in season closures.

I have invested hundreds of thousands of dollars in Virginia BSB IFQ's. Should you choose to reallocate this quota I hope you have the means to compensate those of us who have significant investments in our quota. Thank you. Joe Del Campo

Sent from my iPhone

James Lovgren

FV Shadowfax

Nov 13,2020

COMMENTS REGARDING BLACK SEA BASS ALLOCATION AMENDMENT

Of the options offered in regard to the reallocation of sea Bass quota, I support Status Quo, primarily because of all the options offered they all will steal more quota from New Jersey. Steal is a harsh word, but its exactly what is being attempted. A little history lesson for the newby's on the council and commission, back in 2003 during the development of what was amendment 13 which in conjunction with the ASMFC created the state by state system which has allocated sea bass quota since that year, each state was proposed to receive an allocation based on their catch history during the time frame of 1980 to 2001. There were a number of different timeframes to choose from and each generally had a different percentage of quota which a state would receive according to the landings they had in any of the timeframes chosen. New Jersey's percentages ranged from a low of 28% to a high of 38% which was indicative of NJ's strong commercial sea bass fisheries, both trap and trawl. Somehow during lunch at the council /commission meeting to decide the fate of the amendment, New Jersey's state director decided that it was a good idea to give away New Jersey's hard earned quota to make a few cry babies to the north happy. So instead of getting a 30 % share, NJ gave away roughly 10% of the total commercial allocation to make other states feel better. And here they are back demanding more.

Let me give you an idea of what NJ gave away. With an average annual coastwide commercial quota of 4 million pounds that means NJ gave away 400,000 pounds every year from 2004 to present. If I use a very conservative average price over that time of \$2.50 a pound, that means New Jersey fishermen gave away one million dollars worth of fish every year for a total around 16 million dollars. Let me be clear, Mr Freeman did not ask any commercial fishermen for their thoughts on this matter he unilaterally gave the fish away, as a Council member at the time I was livid over this unwarranted give away, {and he didn't ask me about this idea until after the fact}. So my position and I'm sure every fisherman in NJ believe that we should not give up another pound of quota. Remove us from consideration, or else give us back some of the quota that we rightfully were supposed to receive, and then take that. During the development of the original summer Flounder plan I didn't hear North Carolina or Virginia offer to give away any of their quota, for any reason, and just recently they fought tooth and nail to retain as much quota as possible from the northern raiders.

Fair and equitable management isn't fair if the ASMFC arranges voting blocks to be able to transfer quota from one state to another by taking from those with the largest fisheries and giving it to other states who never had much of a fishery, so that they will vote for the thievery. With that in mind I support more involvement of the MAFMC in the state by state management system, after all over 90% of Black Sea Bass commercial landings come from federal waters, so its amazing how this plan ever came into place in the first place, but we all know its because the ASMFC has the ability to utilize state by state management plans, while the MAFMC does not.

If the stock has shifted to the north its hard to tell in New Jersey, because we are flooded with them. In over 45 years of fishing I have never seen Sea Bass as plentiful as they are right now, and every year just gets better in regard to the stock, The over all quota should be raised, it is artificially low, and raising it to something resembling a reasonable MSY figure would alleviate some of the need to change allocations. There is something that the council and commission should consider doing that would be a help to almost all the states and their fishermen and would help keep the price stable. Presently Virginia and Maryland manage their quota by an ITQ system, I don't think that Maryland even has an active sea bass fisherman at this point, those with state granted quota are simply leasing it out by the pound, while they count their cash without doing anything. I don't know the present situation in regard to how many active Sea Bass fishermen are working in Virginia under their state ITQ system, but a large amount of that quota has been leased to out of state boats over the last few years. This week alone northern fishing vessels utilizing Maryland and Virginia ITQ poundage had individual landing in the order of, 30,000, pounds, 25,000 pounds and 15,000, a piece, days later in one case the buyer is still trying to sell these fish and price has dropped below a dollar a pound average. [The vessel with the 30,000 pound trip caught those fish in only two days of fishing, that's an insane catch rate]. ITQ fisheries disrupt the market and harm all fishermen, except the lazy dogs renting it out. So if northern states want more quota, let them buy it from Maryland and Virginia at a fair market value that would compensate the present ITQ holders. A system like this exists in Scallops, quota can be leased for a year or sold forever to anyone who has the money. Create a system where the states that need the quota can buy it from the states that don't really utilize it. The purchasing states could set up some type of fee to pay for the quota over time by those utilizing it, [perhaps a 10 cent a pound landing fee on BSB until the purchase price is paid off.]

All the fishermen along the coast are being financially hurt by these huge ITQ landings that destroy the market for weeks at a time. Perhaps its time for a federal maximum trip limit of 7,500 pounds so that all participants can fairly compete and not be unfairly advantaged by these huge ITQ trips. Something needs to be done and now's the perfect time to do it.

Thanks, Jim Lovgren

FV Shadowfax

Comments

From: Joe Gilbert <hiddenemp@aol.com>
Sent: Friday, November 13, 2020 4:21 PM
To: Comments
Subject: [External] Draft Addendum XXXIII

RE: BSB draft addendum #33

Thankyou for the opportunity to comment.
I appreciate the creativity and effort that went into developing the draft Addendum #33.

It would seem simple to support 3.1B and have allocations as proposed in Table 2. Try this first.

Pg 10 3.1B

Increase CT to 5%. Even though it only impacts other states by a fraction of a percent I think it is likely to be opposed by states taking the reduction.

If 3.1B does not get support, then I move to the position detailed below.

State quotas and fishermen's access to resource are historic positions that were hard earned over many years. I expect that states with larger quota shares and the fishermen that have permits to access that quota will vigorously defend from having their positions diminished.

I am active in the CT state water BSB fishery as well as the Federal waters fishery where we regularly land BSB into NJ, VA and NC. I, like others, have large investments in vessels and permits. I want to see CT benefit from BSB, however not at the expense of my NJ, VA and NC permit values. The goal is to increase CT Quota without taking quota from someone else.

Options that reduce or shift baseline quota will be destabilizing to the fishery. Current state quota allocations allow trawlers to land trips in distant ports. Sometimes these trips are profitable and sometimes they are not. Quota shifting would result in diminished economic viability for trawlers to visit distant ports and at some point forego marginal landings. Consequences to the ports must be considered also.

I do not think the DARA approach is right to do.
I am resistant to base allocation change.

Support D Trigger approach. The option that could benefit low quota states without destabilizing current norms is the trigger approach. I support this because while BSB populations in the northern range are increasing, BSB in the southern range is not decreasing. Therefore the established norm is based on something that still exists.

1. Trigger Value -

I support Sub option D1-A

The 3 million pounds represents a recent historical average that allows business as usual for all, before any surplus is distributed.

D2B is good dividing into regions would provide for surplus from region to redistribute without affecting the other region.

I strongly support E-5% to CT off the top.

D3A increase equally if E is not supported

G Regional Configuration - I support sub option G1 2 Regions

3.2.2 Sub option B-1 - Payback only if coastwise quota is exceeded. I would expect states to cooperate and keep account of "borrowed" quota to account for state or regional overages.

3.2.2 Again - in season closures-I support whichever option is most permissive of fishing effort and most lenient on overages. It is important to harvest these fish for ecologic balance and economic opportunity.

Respectfully submitted:
Joseph J Gilbert
Empire Fisheries
Stonington CT
203-606-2831

Comments

From: Sonny Gwin <sonnygwin@verizon.net>
Sent: Friday, November 13, 2020 7:03 PM
To: Comments
Subject: [External] Public comment - Black Sea bass Allocation

•

- Which proposed options/sub-options do you support, and which options/suboptions do you oppose?

I believe that the fair option would be to maintain the current state allocation percentages (status quo).

- Why do you support or oppose the option(s)?

The black sea bass fishery is one of the most important federal fisheries because black seabass are landed 12 months out of the year. Consumers depend on the year-round fishery for consumption while commercial fishermen from West Ocean City; Maryland's only ocean inlet, depend on them for their livelihood. Local fish houses rely heavily on the black seabass quota to remain open year-round which keeps community members employed. It is a very important fishery for the state of Maryland.

- Is there any additional information you think should be considered?

In reference to alternatives for adding state commercial allocations to the Council FMP, I support that commercial state allocations for black sea bass be included in both Commission and Council FMPs. Black seabass are a mainly a federal fishery, with over 70% of seabass caught in federal waters and therefore should be part of the Council's FMP. As a seabass fishery participant and a Council member, this topic impacts me, my family and the State of Maryland greatly.

•

From: [Squarespace](#)
To: [Julia Beaty](#)
Subject: Form Submission - 2020-09 BSB Allocation Amd
Date: Wednesday, November 11, 2020 2:38:20 PM

Sent via form submission from [Mid-Atlantic Fishery Management Council](#)

Name: Mark Hodges

Email: mlhodges56@verizon.net

Primary state(s) for black sea bass fishing activity:: Virginia

Comments: Mark Hodges, I am full time comm. BSB trap fisherman, I support status quo. The science that the northern states are basing this proposed % changes is false. The stock is expanding not shifting. There still exist large amounts of BSB below Wilmington NC, the Chesapeake bay is full of nice BSB all the way up into Maryland. I am having the best fall that I have had in a number of years. I have caught almost 19,000#s in Oct. and Nov. as of Nov. 11. It appears that there are not as many BSB in the northern states as there has been in the past because of Ma. just now closing, where in the past years they were never open for this long. My biggest problem with this quota grab is the use of the extra quota that the northern states may get. From Ney Jersey south the BSB quota is caught almost exclusively by full time commercial fishermen. If the northern states do get the extra quota a very high % of the quota will go to recreational who buy a state license authorizing them to sell BSB at very small trip limits, thus creating a nice financial windfall for these northern states, a 50# trip limit is not a comm. fishery. The vast majority of these fishermen do not have a comm. BSB license, because most of the fish come from state waters. Mark Hodges

From: [Squarespace](#)
To: [Julia Beaty](#)
Subject: Form Submission - 2020-09 BSB Allocation Amd
Date: Friday, November 13, 2020 3:50:12 PM

Sent via form submission from [Mid-Atlantic Fishery Management Council](#)

Name: Thomas Anderson

Email: tommya705@comcast.net

Primary state(s) for black sea bass fishing activity:: New Jersey

Comments: I'd like everything to stay at status quo. I feel that we gave away enough quota in the past and have no problem catching the quota available to us now.