
From: John Kolano <hdcars@aol.com>
Sent: Wednesday, March 17, 2021 1:45 PM
To: Kiley Dancy
Subject: Fluke scup sea bass

RECOMMENDATION

1) CHANGE IN REALLOCATION	RECOMMENDATION	STATUS QUO
2) TRANSFERS	RECOMMENDATION	NO TRANSFERS
3) FUTURE AMENDMENT	RECOMMENDATION	REQUIRE AMENDMENT

Comments

Doing regression analysis going back 30-40 years with all the technology advances Boats, Engines, Electronics, And Communications defies all logic. You may draw the line, but its only a line....meaningless.

Sent from my iPhone

From: philip <psuwelsh@gmail.com>
Sent: Thursday, March 18, 2021 3:13 PM
To: Kiley Dancy
Subject: Allocation amendment comments

Hello,

Here are my comments on this:

Based on the presentations made, it is obvious that the recreational fishing sector be allocated more %. I have been following this and attended the latest Webinars, both for the MAMFC and the NJ state meetings, and it is clear that without a change a negative adjustment in the NJ regs could easily occur in 2022.

I also find that the commercial sectors issue with how the recreational sector reports a red herring meant to either give the Council "cover" to vote status quo OR table the decision. This just cannot happen. Asking the recreational sector to report each trip is just not administratively feasible nor reliable. Are we really going to ask someone who fished the beaches for a hour to report in? Again, a red herring.

From the presentation, the commercial sector would be giving up possibility while the recreational sector would finally get relief it desperately needs. For black sea bass, it is critical that an adjustment be made, especially considering the rebuilt stock that even the commercial sector has acknowledged.

Please note that I submitted this on the written comment link also and that there is a discrepancy in due date on the MAMFC meeting sites. One say March 16 and another says March 24.

Thank you,

Philip Welsh
Stone Harbor, NJ
518.573.6165

From: Mary Clark Sabo
Sent: Wednesday, March 24, 2021 1:36 PM
To: Kiley Dancy; Beaty, Julia; Coutre, Karson
Subject: FW: Form Submission - 2021-04 Public Comments

From: Squarespace <form-submission@squarespace.info>
Sent: Tuesday, March 23, 2021 5:52 PM
To: Mary Clark Sabo <msabo@mafmc.org>
Subject: Form Submission - 2021-04 Public Comments

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

Name: George Burns

Email: gmoney529@aol.com

Topic: Summer Flounder, Scup, and Black Sea Bass Commercial/Recreational Allocation Amendment

Comments: Feel we should be allowed A 4 fish limit since we haven't overfished the species in 4-5 years



SEAFOOD HARVESTERS OF AMERICA

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(703) 794-5114 • seafoodharvesters.org

March 24, 2021

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

Dear Dr. Moore:

We write to you today on behalf of our 19 member organizations and thousands of commercial fishermen from Alaska to Maine. We are proud stewards of America's seafood, our nation's strategic protein reserve and a critical component of our country's food security.

Reallocation is one of the most controversial issues that fishery managers face. In many cases throughout the country, we have seen efforts to reallocate commercial quota from the highly-accountable, limited access commercial sector that counts fish to a much-less-accountable, open access sector with varying levels of guesswork as to what's actually being caught.

Reallocation can do very real financial damage to commercial fishing businesses, coastal fishing communities, and the supply chain that helps feed America. Reallocation uproots our business plans and our ability to run successful small businesses.

It is also inherently unfair to penalize one sector for playing by the rules while rewarding the other sector for flouting them.

And we cannot ignore the conservation consequences of reallocating from an accountable commercial sector to the uncertain recreational sector, where doing so may impact discards and discard mortality, as well as rebuilding timelines which could mean a reduction in quotas for all fishermen; in the case of the latter, commercial fishermen are unfairly hit with a "double whammy" where they lose quota to reallocation and to lower catch limits.

Fishermen United for the Future.

Alaska Bering Sea Crabbers • Alaska Whitefish Trawlers Association • Cape Cod Commercial Fishermen's Alliance • Cordova District Fishermen United • Fishermen's Marketing Association • Fishing Vessel Owners' Association • Fort Bragg Groundfish Association • Georges Bank Cod Fixed Gear Sector • Gulf Fishermen's Association • Gulf of Mexico ReefFish Shareholders' Alliance • Hawaii Longline Association • Maine Coast Fishermen's Association • Midwater Trawlers Cooperative • New Hampshire Community Seafood • North Pacific Fisheries Association • Purse Seine Vessel Owners' Association • Rhode Island Commercial Fishermen's Association • South Atlantic Fishermen's Association • United Catcher Boats

We cannot support that happening here.

To be clear—we are strong supporters of improving the accuracy, precision, and timeliness of recreational catch and effort data. The more accountable the recreational sector becomes, the more access they will receive. And they deserve the chance to experience the benefits that come with accountability, as we did.

We urge the Mid-Atlantic Fishery Management Council to look forward—not backward—and focus its efforts on crafting meaningful solutions for the recreational sector that better count fish and don't harm commercial fishermen, but instead improve accountability and therefore improve their sustainable access to the fish stocks in the region.

We appreciate your consideration.

Sincerely,

Christopher Brown
President

Leigh Habegger
Executive Director

Captain John Richardson
95 Clifton Ave, Hull, MA 02045
cell (781) 718-0306 ~ office (781) 749-2209
je.richardson.builder@gmail.com

March 17, 2021

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

RE: Comments on Summer Flounder, Scup, and Sea Bass Allocation Amendment

Dear Dr. Moore:

I recommend catch based allocations as follows:

- **Summer Flounder Option 1a-2 = Catch Based Allocation – 43% commercial, 57% recreational.**
- **Scup Option 1b-3 = Catch Based Allocation – 61% commercial, 39% recreational.**
- **Black Sea Bass, Option 1c-2 = Catch Based Allocation – 28% commercial, 72% recreational.**

Quota Transfer Process Alternatives Option 2b - Two Year Phase in Period

The commercial quota increases were implemented for summer flounder in 2019 and for black sea bass in 2020 as a direct result of MRIP revisions. As a result we recommend the most expedited or two year phase in period.

Quota Transfer Cap Alternatives

I would not recommend the transfer between sectors. Equitable and timely reallocations should lessen underutilization.

The National Academy of Science concluded that MRIP data is the best available science to manage the recreational fishery. This data fully supports immediate reallocation of commercial and recreational quotas on a catch based basis. Delaying this action due to speculation that the Recreational Reform Initiative may, some day, contribute to equitable allocations or improve utilization of the resource risks further detrimental impact to the recreational fishery in the immediate future.

Because the country's need for small group outdoor activities caused by the Corona Virus pandemic will, no doubt, increase effort in recreational fisheries and because the above proposed actions are consistent with the maximum sustainable yield directives of the Magnuson Stevens Act, I believe there exists a uniquely appropriate opportunity for government to match current public needs with well-established fishery policy.

Very truly yours,

Capt. John Richardson

Capt. John Richardson
Stellwagen Bank Charter Boat Association, Member and Trustee

From: [Dustin C. Leaning](mailto:Dustin.C.Leaning)
To: [JAMES TIETJE](mailto:JAMES.TIETJE)
Cc: [Kiley Dancy](mailto:Kiley.Dancy); [Coutre, Karson](mailto:Coutre.Karson); [Beaty, Julia](mailto:Beaty.Julia); [Savannah Lewis](mailto:Savannah.Lewis)
Subject: RE: [External] Summer Flounder, Scup, Black Sea Bass Amendment
Date: Thursday, April 1, 2021 9:08:30 AM

From: patriottoo@aol.com [mailto:patriottoo@aol.com]
Sent: Wednesday, March 31, 2021 4:08 PM
To: Dustin C. Leaning <DLeaning@asmfc.org>
Subject: [External] Summer Flounder, Scup, Black Sea Bass Amendment

Dustin,

This amendment represents a very complex issues for three species that are very important to Massachusetts and my party boat business. I have been observing the management of them for over 40 years. Some years we catch our share of fish for our customers some years we have to avoid a species because every single fish is too small and we don't want to hurt fish or our future. Consistently over the years our catch has been slowly reduced by bag limits, size limits, and seasons, it never goes the other way.

It seems that the MIRP data has caused this amendment to be necessary as it now appears that the recreational sector has been catching more fish all along. So in the interest of keeping the actual ratios closer to reality we need to adjust. I know this is hard for all parties because it affects us all economically. Never the less if what you are saying is true and I am not going to debate the history, statistics or science, I think we should do the following:

- 1a-2 for flounder
- 1b-3 for scup
- 1c-2 for black sea bass
- Phase it in right away.
- Make it consistently catch based.
- No transfers.

I know that we will all be monitoring the outcome of this change and as usual you try to improve the data and fishermen should always to be better conservationist and do everything we can to protect the resource.

Regards,
Jim Tietje
Patriot Party Boats