

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

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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