Richard Hoff
4/10/2020 14:10
rick@dockstreetseafood.com

Attn: National Marine Fisheries Council
The Illex fishery is not over fished, the T.A.C. number was reached, and the fishery was shut down. This is the way it is supposed to work.
The arguments put forth at the public hearings were based solely on money and not on science.
The boats involved in the fishery had their biggest year ever. They made more money in less time. (Is this a bad thing?)
The people who are asking to have boats eliminated from the fishery using the argument of overfishing are the same people who are requesting to have the T.A.C. number increased because of the huge biomass we are seeing.
Is it better to let one boat catch six million pounds and employ 5 people or allow six boats to catch one million pounds each and employ 30 people?
At a time like this I don't think its prudent for any Federal Agency to be eliminating jobs.
The larger vessels will still land the majority of the Illex stock due to their ability to safely work rougher weather, pulling bigger nets, and a higher carrying capacity.
If we eliminate vessels from this fishery they are not going away. They will be displaced into other fisheries that might not have a stock assessment as strong as the Illex squid fishery.
There are approximately 28 permits with zero landings. If a concession must be made, eliminating these permits would reduce the possible latent fishing effort by 40%.
In conclusion, any vessel that has participated in the Illex Fishery from 1997-2019 should be allowed to continue fishing without a tier system. There is no biological reason for the current action, and it is in violation of National Standard 5 of the Magnuson Stevens Act.
Thank you for consideration in this matter.
Respectably Submitted,
Richard A. Hoff
o Dock St. Seafood,
o F/V Susan Marie II
o F/V Susan Marie
o F/V Atlantic Warrior
o F/V Nordic Viking
o Holly Beach Fisheries

Meade Amory
4/20/2020 15:47
meade@amoryseafood.com

Our company has been packing ilex squid each summer for over 30 years and it is a vital part the economy for this community. From June through September we stay busy packing Ilex until the other fishing seasons start up again in the Fall. The public hearing document briefly touches on community impact of potential redistribution. Kingston RI and Cape May NJ have the largest percent of landings, but Hampton Virginia has a just as much a dependence on Ilex. We might have smaller amount, but that amount is directly responsible for 50 + people that rely solely on the Ilex from June through September. We have lost a 30 -45 days of work over the last couple years because the quota has been reached.

In early 2012 we bought a boat, permit and RSW system specifically for getting into the Ilex fishery. It took us over a year and a lot more money then we thought to get the boat rebuilt and ready for fishing. We were late getting started and landed our first trip on July 1 2013. It was not a great season and we only landed a little over 200,000 lbs. As it stands now a proposed qualifier at 500,000 lbs. (B5) from 97 -13 (A4) does not work for us. However, based on language that was in the original Ilex qualification criteria there appears to be strong president to allow similar language in this amendment. I would propose language like this: A vessel that was under construction for , or was being re-rigged for use

in the directed Ilex fishery during the year leading up to the control date shall qualify for a Tier 1 permit if more than 300,000 lbs. of Ilex were landed by that vessel during the 2014 season.
OR,
Another option for Tier 1 would be to add year 2014-2019 with landings of over 1,000,000. lbs. in addition to the 97-13 / 500,000 lbs. (A5 with B5/B6)

We also bought another boat in 2016 and had significant Ilex landings in 2017 and 2018. As much as we would like to see this permit also qualify for Tier 1, we will support using alternatives A2 and B4 that would establish a Tier 2 permit. It is very important that the Tier 2 permits be allowed to land enough volume to be viable. 47,000 lbs. is to low and 124,000 lbs. is to high. I would suggest 85,000. lbs. (C5) landing limit for the Tier 2 qualifiers.

James Lopes
4/20/2020 15:48
JML@NORPEL.COM

Monday, April 20, 2020

Dr. Chris Moore
Executive Director
Mid-Atlantic Fishery Management Council

RE: MSB Goals and Illex Permits

Dear Dr. Moore,

Thank you for the opportunity to publicly comment regarding the proposed Illex squid permitting amendment to the Mackerel, Squid, Butterfish Fishery Management Plan.

I would first like to take this opportunity to introduce myself and my connection to the Illex squid fishery. My name is Jim Lopes and I work for Northern Pelagic Group, LLC- NORPEL in New Bedford, MA as the Operations Director. Over the past several years, NORPEL has become reliant on the Illex squid fishery. During the summer months, NORPEL catches, freezes, processes, stores and distributes Illex squid. Without Illex squid, most of the employees at NORPEL would be laid off, as this is an essential component to our business.

NORPEL employees nearly 100 of the brightest, hardworking and passionate residents of the South Coast of Massachusetts. Further we support local businesses and shoreside services such as trucking companies, gear manufacturers, packaging suppliers, ice houses and so many more.

By removing more participants from the Illex squid fishery, I am fearful that many of the fishing vessels who currently provide squid to NORPEL will lose their permits. This will have significantly negative impacts on NORPEL and the community of New Bedford. Maintaining geographic flexibility and maximizing the number of fishing vessels in the Illex squid fleet is absolutely vital.

Considering the above, I support the following proposal:

1) Preferred: No action; requalification of all 76 permits.

2) Preferred Alternative: Minimal action; full requalification of 51 active permits. This allows for requalification of all active permit holders with more than 50,000 pounds landed in any one year from 1997 to 2019. This essentially eliminates permits for the non-participants in the fishery in the time frame from 1997-2019.

3) Acceptable Alternative: Should the council insist on a tiered approach, we can support the following:

• Tier 1 Classification: 500,000 pounds best year qualifier 1997-2013;
or 1,000,000 lbs. best year qualifier 2014-2019 (+/- 41 permits).

• Tier 2 Classification: 100,000 pounds best year qualifier 1997-2019;
90,000 lbs. trip limit; no sub-quota (+/- 7 permits).

• Tier 3 Classification: 50,000 pounds best year qualifier;
47,000 lb. trip limit; no sub-quota (+/- 3 permits).

• Incidental limit: 10,000 lbs. (+/- 25 permits).

• No new fish-hold capacity limitation.

I urge the council to consider the motives behind a requalification amendment, which seeks to remove current active participants from a healthy fishery that supports vessels, shoreside industries and communities from Massachusetts to South Carolina. Illex squid is a public resource that vessels should be allowed to pursue in order to provide the greatest net benefit to the nation and not hoarded by a few entities.

Once again, I thank you for the opportunity to comment on this situation.

Sincerely,

James Lopes
Northern Pelagic Group, LLC - NORPEL

John DePersenaire
4/20/2020 20:43
news@joinrfa.org

April 20, 2020

Dr. Christopher M. Moore, Executive Director
Mid-Atlantic Fishery Management Council
cmoore@mafmc.org

Re: MSB Goals and Ilex Permits

Dear Dr. Moore:

On behalf of the Recreational Fishing Alliance (RFA), please accept the following comments in regard to the proposed goals and objectives and Ilex permit amendment to the Mackerel, Squid, Butterfish Fishery Management Plan. The RFA is a national, grassroots political action organization established to safeguard the rights of saltwater anglers, protect marine and tackle jobs and the ensure the long-term sustainability of our nation’s saltwater fisheries. The RFA and the broader recreational fishing industry have an interest in this proposed action due to the shared waters in which commercial fishermen target Ilex and recreational anglers target highly migratory species during the peak of our offshore fishing and tournament seasons. Over capacity in some fisheries has been a cause of spatial conflicts between sectors as well as disruptions to recreational fishing operations during times of concentrated effort. Listening in during the webinar public hearings, it was evident that there is a need to address latent permits and prevent the rush to enter this fishery.

The RFA believes that reducing the number of latent permits in the Illex fishery is necessary and appropriate at this time in order to slow the race to fish in the fishery, which has the potential to increase conflicts in the offshore waters between trawl fishing and recreational anglers who are pursuing offshore pelagic species such as marlin, tuna, and swordfish. An average offshore recreational trip to the canyon may cover a significant amount of ground to find fish, upwards of 140 miles on the troll. This illustrates the vast amount of area utilized by recreational anglers in the HMS fisheries as opposed to the bottom fisheries which focus on specific bottom features such as wrecks, rocks, reefs, sloughs and other physical features. An influx of commercial vessels targeting Ilex during this time of year could be highly disruptive. The current level of participation in terms of number of vessels in the commercial ilex fishery that have been actively fishing the Mid-Atlantic canyons in recent years, is adequate and has not caused any conflicts with the recreational sector. RFA supports maintaining the current level of vessels and does not want to see any expansion in this fishery.

Therefore, the RFA supports Alternatives A5 and B6. RFA recognizes that the combination of these two alternatives, if implemented, would result in the lowest number of re-qualifying permits. RFA believes it is imperative that the council work to eliminate all latent permits with minimal fishing history and prevent an expansion of effort. The recreational sector is very much concerned with the speculative influx of vessels into the Ilex fishery which has been observed as the ilex squid resource has become more plentiful in recent years.

The past several years have seen the Illex resource expand its traditional range but this will change again and we will see a retraction like we have in past years where most of the squid will be concentrated in one or two canyons. The existence of latent permits holds the potential for drastic increases in effort as well as creating spatial conflicts between sectors. Furthermore, an increase in fishing pressure by Illex boats has the potential to create localized disruptions to Illex which is one of the key forage species for offshore species targeted by recreational anglers.

As the Illex fishery has ramped up to catch the quota during the last three years, additional vessels are working the edge of the shelf where recreational anglers focus their fishing activities. We have a history of a good working relationship with fishermen that have operated in the fishery for many years and are concerned that any number of additional vessels may continue to access the fishery this summer and into the future and increase gear conflicts on the offshore grounds.

RFA encourages the Council to consider potential impacts to recreational fishermen as it deliberates final action on the MSB amendment. The resulting conflicts on recreational fishing opportunities from an increase in active boats fishing for Ilex in the middle Atlantic canyons during the peak of the recreational offshore HMS season must be a consideration in the final action for the proposed amendment. Thank you for the opportunity to provide input and for your consideration of our concerns.

Sincerely,

Jim Donofrio
Executive Director

MSB Committee Members,

Recently the SSC recommended that the council increase the illex quota to 30,000 MT for fishing years 2020 with another possible increase in 2021 as the council looks to a more dynamic quota management system. This is great news as it shows the SSC's belief that the stock remains lightly exploited and that the current level of fishing activity has had minimal impact on the health of the stock. In recent years both historical communities and developing communities have greatly benefitted from the health of the fishery and the market, with historical communities having record revenues in 2017-2019.

Currently you are now being asked to vote on preferred alternatives on the MSB illex permitting amendment, which could substantially reduce access to the fishery. Overly reducing access at this time would fly in the face of the current, and newly proposed, MSB goals and objectives. To raise quotas while simultaneously cutting out active participants in a fishery causes undue harm to those participants while further enriching the remaining members.

Even reducing access can have a huge impact. For example if the proposed "Historical Compromise" tier system were in place in 2019 with a 48,000 lb trip limit my vessel the Gabby G would have had its landing capability reduced by 68%. Total landings and revenues from illex would've decreased by 55.86%, and my total yearly revenues would've decreased by 20%. That reduction could mean the difference between being able to make a mortgage payment and losing a vessel.

I ask you to please take the least restrictive measures at this time, and to keep in mind the smaller players in this industry.

Thank you for your time and consideration of my comment.

Dan Farnham Jr.

FV Gabby G

Good Afternoon Chris and Jason,

I made a request to GARFO for information on illex landings and values by state from the years 2000-2019. I have attached the information that I received from GARFO staff and would request that this be included with all correspondence and documents for future meetings pertaining to this amendment.

While some of the information is unavailable to due confidentiality concerns I believe it is still important. Specifically in regards to the argument of community impacts with the historical communities of Cape May, NJ and North Kingston, RI being negatively impacted by increased participation in the fishery, I believe this data shows that while the percentage of total illex landings may have decreased in these states, the total lbs landed and revenues are at near record highs.

This seems to show that while the seasons may have been shorter in recent years, that profits and efficiency were increased.

If the FMAT and council plan to use community impacts as a primary reason for moving forward with a more restrictive management plan, such as reducing the number of permits and/or the level of access those permits have to the fishery, I would ask that there be a more intensive economic impact analysis done than what has been presented in the public hearing document, and that this information be made publicly available.

I have also included an updated version of the table provided by GARFO with some of the missing info filled in via the data available on GARFO's archive of weekly landings reports, any updates are listed in orange.

Thank You,

Dan Farnham Jr.

Silver Dollar Seafood Inc.

P.O. Box 2242

Montauk, NY 11954

(631) 374-2796

DOC/NOAA FISHERIES/GARFO
APSD MONITORING & ANALYSIS DIVISION
ILLEX SQUID LANDINGS & VALUE BY STATE 2000 - 2019
FROM NMFS DEALER WEIGHOUT DATABASE

YEAR	MAINE			MASSACHUSETTS			RHODE ISLAND		
	LBS LAND	VALUE	EX-VESSEL PRICE	LBS LAND	VALUE	EX-VESSEL PRICE	LBS LAND	VALUE	EX-VESSEL PRICE
2000				15,245	$6,004	$0.39	9,066,006	$2,109,796	$0.23
2001				582	$279	$0.48	7,143,562	$1,604,540	$0.22
2002				3,765	$1,905	$0.51	5,264,144	$1,255,271	$0.24
2003							10,161,786	$3,206,424	$0.32
2004				1,277	$785	$0.61			
2005				181,487	$134,944	$0.74	15,678,337	$5,899,785	$0.38
2006							18,085,252	$5,582,102	$0.31
2007							7,845,100	$1,912,823	$0.24
2008				1,145	$958	$0.84	11,757,361	$4,146,994	$0.35
2009				15,558	$13,070	$0.84			
2010				9,952	$5,604	$0.56	12,431,607	$5,327,184	$0.43
2011	1,256	$1,276	$1.02	3,919	$2,231	$0.57	16,078,840	$9,060,381	$0.56
2012	1,118	$1,353	$1.21	921	$971	$1.05			
2013				1,719	$1,739	$1.01			
2014				93,323	$50,030	$0.54	10,291,096	$3,742,838	$0.36
2015				1,197	$1,860	$1.55			
2016				43,685	$51,651	$1.18	10,405,994	$5,514,020	$0.53
2017				9,791	$9,680	$0.99	23,054,999	$13,536,539	$0.59
2018				3,397,056	$1,356,146	$0.40	20,786,875	$11,887,382	$0.57
2019				17,906,387	$7,200,099	$0.40	18,695,753	$10,908,249	$0.58

	CONNECTICUT			NEW YORK			NEW JERSEY		
	LBS LAND	VALUE	EX-VESSEL PRICE	LBS LAND	VALUE	EX-VESSEL PRICE	LBS LAND	VALUE	EX-VESSEL PRICE
2000							8,708,583	$1,515,560	$0.17
2001							1,297,217	$204,617	$0.16
2002									
2003									
2004							30,973,571	$6,740,325	$0.22
2005				16,571	$6,037	$0.36			
2006				42,605	$30,160	$0.71			
2007	2,559	$1,794	$0.70	5,855	$6,158	$1.05			
2008									
2009									
2010							20,335,605	$5,670,902	$0.28
2011							22,631,562	$9,154,668	$0.40
2012							13,346,864	$4,529,848	$0.34
2013				373	$370	$0.99	4,440,669	$1,129,434	$0.25
2014				6,026	$6,320	$1.05			
2015				1,110	$1,376	$1.24	868,191	$153,569	$0.18
2016				3,386	$4,930	$1.46	3,872,709	$1,488,531	$0.38
2017				5,472	$5,916	$1.08	24,894,184	$8,044,796	$0.32
2018				10,893	$7,041	$0.65	27,247,086	$9,749,563	$0.36
2019							21,598,662	$9,210,256	$0.43

DOC/NOAA FISHERIES/GARFO
APSD MONITORING & ANALYSIS DIVISION
ILLEX SQUID LANDINGS & VALUE BY STATE 2000 - 2019
FROM NMFS DEALER WEIGHOUT DATABASE

	VIRGINIA			NORTH CAROLINA		
	LBS LAND	VALUE	EX-VESSEL PRICE	LBS LAND	VALUE	EX-VESSEL PRICE
2000				85,267	$11,197	$0.13
2001	169,414	$20,736	$0.12	466	$192	$0.41
2002				92,245	$14,732	$0.16
2003				534,040	$107,375	$0.20
2004				2,478,843	$494,057	$0.20
2005	689,692	$196,452	$0.28	1,442,668	$275,508	$0.19
2006				885,948	$155,470	$0.18
2007				248,509	$47,765	$0.19
2008						
2009	621,047	$77,669	$0.13			
2010	958,893	$222,611	$0.23	1,149,142	$230,473	$0.20
2011	1,490,807	$413,484	$0.28	1,232,768	$343,509	$0.28
2012	634,173	$158,623	$0.25			
2013				216	$326	$1.51
2014						
2015	38,136	$8,080	$0.21			
2016	383,786	$153,562	$0.40			
2017						
2018	1,658,130	$605,230	$0.37			
2019						

	CONFIDENTIAL			TOTAL
	LBS LAND	VALUE	EX-VESSEL PRICE	
2000				17,875,101
2001				8,611,241
2002				5,360,154
2003				10,695,826
2004				33,453,691
2005				18,008,755
2006				19,013,805
2007				8,102,023
2008				11,758,506
2009				636,605
2010				34,885,199
2011				41,439,152
2012				13,983,076
2013				4,442,977
2014				10,390,445
2015				908,634
2016				14,709,560
2017				47,964,446
2018				53,100,040
2019				58,200,802
	154,273,674	$42,008,889	$0.27	154,273,674

Grand Total
567,813,712