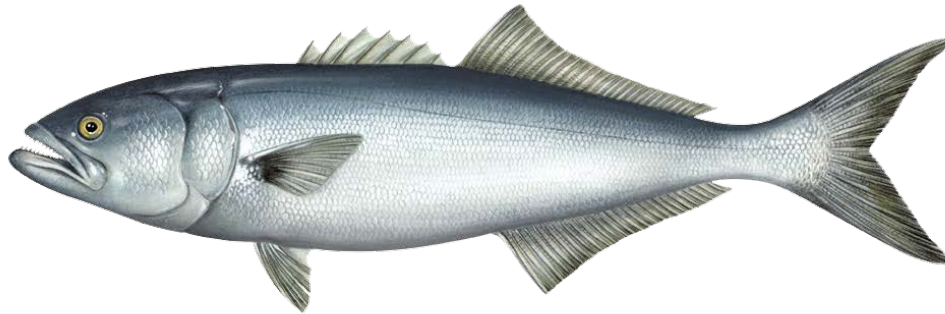


# Bluefish Allocation Amendment Scoping Comments Summary



August 2018

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



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## 1 INTRODUCTION AND COMMENT SUMMARY

### 1.1 SCOPING OVERVIEW

The Mid-Atlantic Fishery Management Council and the Atlantic States Marine Fisheries Commission have proposed to develop a Bluefish Allocation Amendment. This amendment was initiated in order to review/revise the FMP goals and objectives, commercial/recreational allocations, commercial allocations to the states, the quota transfer processes, and any other issues. Additional information and amendment documents are available at: <http://www.mafmc.org/actions/bluefish-allocation-amendment>.

The scoping process commenced from publication in the Federal Register on June 6, 2018 and continued through July 30, 2018. Scoping is the process of identifying issues, potential impacts, and reasonable alternatives associated with a particular management issue. It provides the first and best opportunity for the public to make suggestions or to raise issues and concerns before development of an amendment begins. No alternatives are set during the scoping process.

Twelve public scoping hearings were held from Massachusetts through North Carolina (Table 1). Hearings were attended by over 114 people in total. Of the 114 people, 53 individuals provided a total of 120 comments on the issues representing individuals and organizations from almost all states that had a hearing.

This document summarizes the major themes of written and hearing comments (section 1), in addition to providing detailed scoping hearing summaries (section 2) and copies of all written comments received (section 3).

**Table 1: Scoping hearing schedule.**

<b>Date</b>	<b>Time</b>	<b>Address</b>
<b>Wednesday, June 20, 2018</b>	6:00 PM	Dare County Commissioners Office, 954 Marshall Collins Drive, Room 168, Manteo, North Carolina 27954
<b>Thursday, June 21, 2018</b>	6:00 PM	NC Division of Marine Fisheries Central District Office, 5285 Highway 70 West, Morehead City, North Carolina
<b>Thursday, June 21, 2018</b>	6:00 PM	Dover Public Library, 35 E. Loockerman Street, Dover, Delaware 19901
<b>Tuesday, June 26, 2018</b>	6:30 PM	NYSDEC Division of Marine Resources, 205 North Belle Mead Road, Suite 1, East Setauket, New York 11733
<b>Tuesday, June 26, 2018</b>	6:00 PM	Ocean City Municipal Airport, 12724 Airport Road, Berlin, Maryland 21811
<b>Wednesday, June 27, 2018</b>	6:00 PM	Ocean City Library, 1735 Simpson Avenue, Ocean City, New Jersey 08226
<b>Thursday, June 28, 2018</b>	6:00 PM	Ocean County Administration Building, 101 Hooper Avenue, Toms River, New Jersey 08753
<b>Thursday, June 28, 2018</b>	6:00 PM	Brevard County Government Center North, "Brevard Room", 518 South Palm Ave., Titusville, Florida 32780
<b>Tuesday, July 10, 2018</b>	7:00 PM	CT DEEP Boating Education Center, 333 Ferry Road, Old Lyme, Connecticut 06371
<b>Wednesday, July 11, 2018</b>	6:00 PM	Plymouth Public Library, Otto Fehlow Room, 132 South Street, Plymouth, Massachusetts
<b>Thursday, July 12, 2018</b>	6:00 PM	URI Narragansett Bay Campus, Corless Auditorium, South Ferry Road, Narragansett, Rhode Island
<b>Monday, July 16, 2018</b>	6:00 PM	Internet webinar: Connection information to be available at <a href="http://www.mafmc.org">http://www.mafmc.org</a> or by contacting the Council

## 1.2 SUMMARY OF COMMENTS

A total of 36 written comments were received via email (33), hand delivered (2), or mail (1) on a variety of issues. Table 2 summarizes major themes of the comments, with the corresponding number of comments received on each issue. This list reflects the most commonly raised themes for each general topic, and does not reflect all issues raised in written comments. See section 3 for the full text of written comments.

The most frequently discussed issues (as summarized in Table 2) were commercial and recreational allocations followed by quota transfer processes, other issues, commercial allocations to the states, and the FMP goals and objectives. Most comments related to the commercial and recreational allocations were in favor of status quo allocations. Under the quota transfer processes, comments were mostly in favor of status quo; few comments did not support transfers from the recreational to commercial sector. Few written comments directly addressed the commercial allocations to the states. Overall, many commenters stated that they would like to see updated data incorporated into the assessments to help reallocate the overall quotas (if necessary).

**Table 2: Summary of major written comment themes, and number received. Because most commenters addressed multiple issues, numbers do not add to total number of submitted written comments.**

Issue	Number of written comments received	Number of hearing comments received
<b>FMP Goals and Objectives</b>		
Supports status quo	1	3
Goals and objectives should be re-evaluated and/or revised	2	0
Supports maintaining one or more of the current objectives	0	1

<b>Commercial/Recreational Allocation</b>		
Supports status quo	19	31
Increase commercial allocation	0	2
Decrease commercial allocation	1	0
Increase recreational allocation	0	0
Decrease recreational allocation	0	1
Update data for reallocation	1	6

<b>Commercial Allocations to the States</b>		
Supports status quo	3	14
Alter commercial allocations to the states	4	7

**Table 2, Continued:**

<b>Issue</b>	<b>Number of written comments received</b>	<b>Number of hearing comments received</b>
<b>Quota Transfer Processes</b>		
Supports status quo transfer from recreational to commercial sector	5	24
Do not allow transfer from recreational to commercial sector	6	0
Supports status quo state-to-state transfers	2	0
Do not allow state-to-state transfers	0	1
Do not allow any transfers	1	1
New transfer suggestion	1	1

<b>Other Issues</b>		
Status quo bag limit	0	5
Increase bag limit	0	4
Decrease bag limit	4	19
Other	10	0

### 1.3 SUMMARY OF PUBLIC SCOPING HEARINGS

The following section contains brief summaries of attendance and major comment themes at each of the twelve public scoping hearings (listed north to south). For a more detailed record of hearing comments, see section 2.

#### Plymouth, MA

Eight people attended the hearing in Plymouth, MA, and 5 gave comments spanning the different issues. Of the 8 attendees, 1 was a private recreational fisherman, 1 was a commercial gill-netter, and 6 were involved in management from a variety of different local agencies. Of those who offered comments, there was a majority consensus that the MA attendees want the allocations to remain status quo until we have an operational assessment that includes updated data. The commercial representative emphasized the importance of the state-to-state transfers and that MA would occasionally exceed their quotas if they did not occur. Overall, the attendees stressed the importance of bluefish in the New England region, and despite the lower abundances in recent years, do not want to see drastic changes to the overall allocations. See section 2.1 for additional detail.

#### Narragansett, RI

One NOAA employee attended the hearing in Narragansett. After a brief presentation from Council staff, no public comments were given at this hearing. See section 2.2 for additional detail.

#### Old Lyme, CT

Eight people attended the hearing in Old Lyme, CT, and 6 gave comments spanning the different issues. In addition to their verbal comments, members of the public stated they will submit written comments to Council staff. Of the 8 attendees, 7 were private recreational fishermen and 1 was a charter boat captain and bluefish Advisory Panel Member. Of those who offered comments, there was a majority consensus that CT private recreational fishermen want the allocations to remain status quo until we have an operational assessment that includes updated data. They feel the bluefish fishery is not as active as in recent years and do not want to see abrupt changes. Stock status is stable and positive and is important to maintain this into the future. See section 2.3 for additional detail.

#### East Setauket, NY

Approximately 19 people attended the hearing in East Setauket, NY, and 13 gave comments. In addition to their verbal comments, two fishermen provided written comments to Council staff. The majority of attendees were recreational for-hire fishermen. Of those who offered comments, many spoke in favor of maintaining the current 83/17 split between the recreational and commercial allocation and do support the quota transfer from recreational to commercial, when available.

Many attendees were concerned about the recreational bag limit. Most for-hire fishermen want to maintain the 15 fish bag limit as it provides great opportunity for clients to go home with lots of fish. If the bag limit is reduced, many for-hire fishermen feel they will lose clients since the number of landings may not be worth the trip. On the contrary, few attendees are supportive of reducing the bag limit in order to develop the recreational fishery into more of a sport fishery.

Of the commercial fishermen attendees, many feel the commercial allocation is too low and needs to be re-evaluated with more recent catch histories. Additionally, the state-to-state transfers are necessary and allow NY to catch more fish. The commercial fishermen are very concerned about the update to the MRIP numbers and feel the recreational sector should be subject to the same accountability measures as the commercial sector. See section 2.4 for additional detail.

**Toms River, NJ**

13 individuals provided public comment out of 30 total attendees. Attendees included 8 from the recreational sector and 6 from the commercial sector (including one dealer), as well as 9 staff members from NJDFW. Comments supported the status quo for the recreational and commercial sector allocations, state commercial quota allocations, and transfer processes. Many comments were concerned with starting an amendment prior to receiving an updated stock assessment with updated MRIP numbers, and noted that a research recommendation should be to look at the impacts of hurricane Sandy and beach replenishment on bluefish populations. See section 2.5 for additional detail.

**Ocean City, NJ**

Seven individuals provided public comment out of 23 total attendees. Attendees included 10 from the recreational sector and 1 from the commercial sector, as well as 9 staff members from NJDFW. Comments generally supported status quo for the transfer of quota from the recreational to commercial sector. Two comments cautioned against reallocating commercial quota amongst the states. One person was in support of continuing with the quota transfer processes, and suggested quota transfers should be timed when fish are needed in the fall. There was discussion and several comments relating to concerns with the accuracy of MRIP estimates and how the updated numbers will affect this amendment. See section 2.6 for additional detail.

**Dover, DE**

One recreational fisherman and an additional Council staffer attended the hearing in Dover. After a presentation from Council staff, no public comments were given at this hearing; the one recreational fishermen stated they may submit written comments. See section 2.7 for additional detail.

**Berlin, MD**

Four individuals attended the meeting and gave comments, in addition to one Council member present. Three represented the commercial sector and one was a recreational charter boat captain. The comments generally supported status quo for all issues, since the system seems to be working. All had some concerns about unreliable recreational MRIP estimates being used for management. One person expressed frustration with the northern state commissioners wanting to take quota from southern states. See section 2.8 for additional detail.

**Manteo, NC**

Eight people attended, including four commercial fishermen, one recreational fisherman, and two NCDMF employees. Five people gave comments. Comments generally supported the flexibility provided by quota transfers, and highlighted the need to further investigate changes in migratory patterns, distribution and stock structure of bluefish. One person suggested the possibility of setting up a quota bank. See section 2.9 for additional detail.

**Morehead City, NC**

One individual from the commercial sector attended the meeting and gave comments. One other individual attended the meeting as a member of the press. There was discussion of what the purpose of this amendment is, considering that bluefish management seems to be working well. Comments indicated that North Carolina does not want their commercial allocation reduced, and that the transfer process is working well. See section 2.10 for additional detail.

**Titusville, FL**

Six people attended the hearing in Titusville, FL, and 5 gave comments. In addition to their verbal comments, members of the public stated they will submit written comments to Council staff. Of the 6 attendees, 3 were commercial fishermen, 1 was a recreational fisherman, and 2 were dealers. Of those who offered comments, there was a majority consensus that Florida stakeholders want the allocations to remain status quo. They feel the bluefish fishery is actively growing and do not want to lose any future opportunity due to the allocations being altered. See section 2.11 for additional detail.

**Internet Webinar**

Three individuals participated in the webinar hearing. The three members of the public were representing the commercial sector, a commercial fisheries reporter, and NOAA Fisheries. After a presentation from Council staff, no public comments were given at this hearing. There was ample discussion on how the new MRIP numbers may affect this amendment and the current status of bluefish moving forward. The commercial representative stated they will be supplying multiple written comments along with other stakeholders at a later date. See section 2.12 for additional detail.



## 2 SCOPING HEARING SUMMARIES

### 2.1 PLYMOUTH, MA

Wednesday, July 11, 2018, 6 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
Paul Caruso	Recreational	Marston Mills, MA
Tom Smith	Commercial	Orleans, MA
Dan McKiernan	MA DMF	Boston, MA
Matt Cutler	NEFSC SSP	Woods Hole, MA
Bill Doyle	MFAC	Plymouth, MA
Raymond Kane	ASMFC	Chatham, MA
Michael Pierdinock	MA MFC	Plymouth, MA
Nichola Meserve	MA DMF	Boston, MA

#### Issue 1

No comments given.

#### Issue 2

**Paul Caruso:** I want to stress the importance of bluefish in the area. Bluefish and stripers are the two main targets and abundant stocks are vital to keep the fisheries happy/stable. We need as many bluefish in the water as possible to maintain the fishery especially with the changes we have observed in recent years. I would like to see the new data incorporated into the assessment to develop updated allocations.

**Tom Smith:** Bluefish are highly prone to natural cycles. The numbers seemed to be skewed when you compare them to the 1980s. Bluefish were much more abundant in the 1980s. Now, that there are more stripers there has been a decrease in effort for bluefish. Please keep status quo allocations.

**Mike Pierdinock:** I want to emphasize the importance of bluefish in this region and note that the new MRIP numbers seem to be ~3x higher than what was previously thought. We should keep status quo allocations until we understand the new MRIP numbers and they have been incorporated into an assessment.

**Ray Kane:** We should keep status quo allocations until we understand the new MRIP numbers and they have been incorporated into an assessment. Ultimately, we need a better time series.

#### Issue 3

**Tom Smith:** It is necessary to reallocate the state-to-state allocations. Northern states consistently request quota from other states.

**Dan McKiernan:** It is necessary to reallocate the state-to-state allocations. Northern states consistently request quota from other states.

**Issue 4**

**Tom Smith:** The bluefish FMP calls for quota transfers. I am highly supportive of state-to-state transfers in MA. Fishing would have ended in August last year without the state transfers. The markets continue to want local fresh fish and the quota transfers allow for yearlong fishing.

**Paul Caruso:** From a stock point of view, it is not a great idea to be transferring fish from FL to northern states. Different stocks?

**Dan McKiernan:** The way the transfers occur is appropriate. State-to-state transfers are great to lean on if we are not going to hit our quota. Great for a fish that is highly migratory.

**Issue 5**

**Dan McKiernan:** The 10 fish bag limit in MA seems quite liberal.

**Mike Pierdinock:** Abundances of (mako) sharks have a significant impact on bluefish populations. This is very important to take into account when looking at ecosystem-based management.

**2.2 NARRAGANSETT, RI**

Thursday, July 12, 2018, 6 p.m.

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<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
<u>LAUREN GENTILE</u>	<u>NOAA/NEFSC/SSB</u>	<u>Narragansett, RI</u>

No public comments were given at this hearing.

**2.3 OLD LYME, CT**

Tuesday, July 10, 2018, 7 p.m.

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<u>Name</u>	<u>Sector</u>
George Baldwin	Recreational
Barry McGuire	Recreational
Patrick Vogt	Recreational
Ray Rivera	Recreational
Charles Gargano	Recreational
Bill Goeben	Recreational
Michael Pirri	Charter Captain
Unknown	Recreational

**Issue 1**

**Barry McGuire:** We need to review and better understand the relationship between the inshore and offshore populations.

**Issue 2**

**George Baldwin:** Status quo allocations because we are in the middle of the SSB threshold and target, do not increase the commercial quota as there is constantly an advisory on eating bluefish. Make consumers aware about health risks.

**Barry McGuire:** Status quo allocations because we are in the middle of the SSB threshold and target.

**Patrick Vogt:** Status quo allocations because we are in the middle of the SSB threshold and target.

**Ray Rivera:** Status quo allocations because we are in the middle of the SSB threshold and target.

**Charles Gargano:** Status quo allocations because we are in the middle of the SSB threshold and target.

**Bill Goeben:** Status quo allocations because we are in the middle of the SSB threshold and target.

**Issue 3**

**Barry McGuire:** Reallocate the commercial allocations to the states using updated data.

**Patrick Vogt:** Reallocate the commercial allocations to the states using updated data.

**George Baldwin:** Reallocate the commercial allocations to the states using updated data.

**Issue 4**

**Patrick Vogt:** Remain status quo on the transfer processes.

**George Baldwin:** Remain status quo on the transfer processes.

**Bill Goeben:** Remain status quo on the transfer processes.

**Barry McGuire:** Do not allow state-to-state transfers to occur because they are unnecessarily removing more fish.

**Issue 5**

**George Baldwin – Recreational:** The way the fishery is currently managed with maximum sustainable yield does not support a large enough buffer. This is a highly variable system that includes invasive and bacteria's that add to natural mortality. This trend is ongoing and not cyclical. How can we manage when new factors are constantly included and unforeseen? Please maintain a status quo bag limit and try to impose better enforcement with higher fines to hopefully incentivize no poaching.

**Barry McGuire – Recreational:** Decrease the 10 fish bag limit or impose a slot limit to help conserve fish.

**Patrick Vogt – Recreational:** Support a status quo bag limit.

## 2.4 EAST SETAUKET, NY

Tuesday, June 26, 2018, 6:30 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
RALPH VIGMOSTAD	NYCRF & LIBBA	GREENLAW NY
CHARLES WITICK	RECREATIONAL	WEST BABYLON NY
Arnold Leo	Town of East Hampton	East Hampton, NY
Victor Vecchio	NOAA FISHERIES	East Hampton NY
Michael Fogel	NYCOM HARK ASS.	SEAFORD, NJ
Joe Angel	King Cod / NY REIFA	MORiches NY
MARIE CUSUMANO	FIELD TESTER II / COMM	MONTAUK, NY
Michael Ardolino	BROOKLYN IZ	BROOKLYN NY
JAMES W. SEITZBERG	JAMES JOSEPH IZ	HUNTINGTON NY
STEVEN CANLIZZO	BROOKLYN IZ / NY REIFA	BROOKLYN NY
Gina Faneli	NYS DEC	E. Setauket NY
Stephanie Bekemeyer	NYS DEC	E. Setauket
JAMES FOSTER	HAMPTON LADY	HAMPTON BAYS -
Pat Augustus	RECREATIONAL / BUS/ADVISORY	CANDLER NY
CARLUCCO	RECREATION	BARYLON NY
J. MCBRIDE	RECREATIONAL / BUS/ADVISORY	N.Y.
Steven R. Winick	Comm / For Hire	ELWOOD NY
Willie Young	N.Y. C.R.F.	MASSAPEQUET, NY
Bob Weigand		

**Issue 1**

**Bob Weigand – Flamingo, For-Hire:** Just as a historical point of view, bluefish has gone in cycles. I remember my father told me, he started in the bluefish fishery in 1955 and it was robust, and then 1959 and all of sudden there were none. It went for a 3-4-year period with none. You would have a small fishery in the fall and the same in the spring. Suddenly, in the beginning of the 1960s it changed, the only time you caught any fish is when you were in deep-water and offshore, and when they were plentiful in shore they were never seen offshore. The bluefish do not stay in a certain place any given time. You can go by past performance to predict future performance, but it is very difficult to do. Taking this into consideration, I think everything should remain status quo. This is not an emergency, and historically it shows this is not an emergency fishery. You have ebbs and flows and that is how the fishery goes.

**Issue 2**

**Ralph Vigmostad:** This is not a time to reallocate limits to the commercial sector or anybody else. The limits, given the state of the fishery, are far too high.

**Charles Witick:** I think the current allocation is proper. There should be no change in the allocations from the recreational to commercial side. One reason, the premise for reallocation of fish is that the recreational anglers did not meet their quota. But, on July 2, 2018 we are going to learn that recreational anglers most likely exceeded their quota by anywhere from 65-250% in the last 5 years. That takes away any reason for

reallocation. Beyond that, fisheries managers have not figured out how to manage a recreational fishery that is primarily a sport fishery. We understand summer flounder, scup, black sea bass. You manage those species for pounds. Two-thirds of caught bluefish are released. In a release fishery you try to encourage abundance and promote catch and release. So, quota is not an effective means of judging the fishery. Keep the current allocation as it is, so anglers can take fish home if they want to. Or, they can release them and hopefully not fear any allocation change in the future.

**Michael Ardolino:** Support status quo allocations.

**James Foley:** Bluefish used to be much more abundant. In the past, there were not nearly as many summer flounder and sea bass boats. People no longer want to target bluefish as often due to the presence of the other species. As sea bass and fluke stocks decline, I ask that you keep the bluefish quota the way it is because we will need to resort back to bluefish fishing.

**Joe McBride:** The striped bass stock is not doing as well as it once was. In recent years, the bag limit was changed from 2 fish to 1 fish. If this stock continues to decline, our target fishery would shift to bluefish like it was many years ago. We do not want anything other than the current regulations in regard to bluefish.

**Arnold Leo:** The present allocations are based from landings from 1981-1989, clearly there has to be a new base established for the allocations (commercially by state). This needs to be addressed through this amendment. It's ridiculous that we are still using allocations based of 1981 data.

**Timothy Froelich:** I have been waiting 20 years for an increase in this fishery, and in my opinion, we are never going to get it. Reduce today for a better tomorrow, but not for me. From the standpoint for a business it is the worst it's ever been. It does not matter which dock you go to up and down the coast.

**Bob Weigand:** Just as a historical point of view, bluefish has gone in cycles. I remember my father told me, he started in the bluefish fishery in 1955 and it was robust, and then 1959 and all of sudden there were none. It went for a 3-4-year period with none. You would have a small fishery in the fall and the same in the spring. Suddenly, in the beginning of the 1960s it changed, the only time you caught any fish is when you were in deep-water and offshore, and when they were plentiful in shore they were never seen offshore. The bluefish do not stay in a certain place any given time. You can go by past performance to predict future performance, but it is very difficult to do. Taking this into consideration, I think everything should remain status quo. This is not an emergency, and historically it shows this is not an emergency fishery. You have ebbs and flows and that is how the fishery goes.

### **Issue 3**

**Michael Ardolino:** Support status quo allocations.

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#### **Issue 4**

**Charles Witick:** Recreational fish should remain in the recreational sector to promote recreational encounters and opportunity. I do not like the current message that we are sending with the way these fish are managed. In the 1960s, no one released bluefish and many of them got wasted. If we still did that today, we would not be talking about allocations because we would have killed them all. So, why now that we are releasing fish are you going to take them away from us?

**Michael Fogal:** New York continues to rely heavily on the state-to-state transfer. We always receive quite a bit of cooperation from other states. I hope they do not plan on changing that because NY commercial fisheries are pretty much dead. We have consistently been bailed out and we need this transfer to continue.

**Joe Tangel:** If there is quota to roll over from the recreational to commercial sector, we are fine with that. Please do not create a crisis. We support status quo.

**Mark Cusamano:** Any transfers from recreational to commercial are desperately needed, especially in NY State. We are seeing drastic reductions in other species and commercial fishermen are having major difficulties making a pay check. (Written comments will also be submitted).

**Michael Ardolino:** Support status quo rollover of quota from the recreational to commercial fishery.

**Steven Cannizzo:** The rollover of quota should continue. This is a commercial issue and they try to get people here to take our quota. There is no problem with the bluefish stock, we just no longer see them as often in our waters. (Written comments were also submitted.)

**James Foley:** We support the quota transfer from recreational to commercial, when available.

**Joe McBride:** We are supportive of a transfer of quota from the recreational to commercial sector, when available, but we do not want this done on a permanent basis.

**Arnold Leo:** Regarding recreational fishing, I agree that the rollover from recreational to commercial should continue.

**James Schneider:** Like sea bass and other species, we have thrown a wrench into fisheries management. As far as commercial, I will give all my extra bluefish we do not use to them. But, when things change just like in the 60s, when they disappeared and then decide to come back we will need to switch into that fishery.

**Timothy Froelich:** We need to get the transferability from the other states to the commercial quota, where there is no more commercial fleet like NC. We need to give it to the states that are using the quota. For example, in NY in July and August, that is when the bluefish are worth the most. That use to be the highest quota period, but now it is one of the lowest because you prosecute a fishery on 1000 lbs of fish. You give them back to us in the fall when they are worth a nickel. Who wants to catch something when you must pay 30 cents to freight and get paid 5 cents for it?

**Bob Weigand:** Just as a historical point of view, bluefish has gone in cycles. I remember my father told me, he started in the bluefish fishery in 1955 and it was robust, and then 1959 and all of sudden there were none. It went for a 3-4-year period with none. You would have a small fishery in the fall and the same in the spring. Suddenly, in the beginning of the 1960s it changed, the only time you caught any fish is when you were in deep-water and offshore, and when they were plentiful in shore they were never seen offshore. The bluefish do not stay in a certain place any given time. You can go by past performance to predict future performance, but it is very difficult to do. Taking this into consideration, I think everything should remain status quo. This is not an emergency, and historically it shows this is not an emergency fishery. You have ebbs and flows and that is how the fishery goes.

#### **Issue 5**

**Ralph Vigmostad:** Bluefish are a mysterious fish that we know very little about. In 1945 a record bluefish was caught and weigh 14.75 pounds from NJ. This was considered a huge fish at the time. In the next 30 years the record increased to 31 pounds from NC. No other fish in the world has seen the world record double over any period of time. Bluefish has done a very odd thing that remains unexplained. Historically, bluefish populations have cycled through large abundances to being almost completely absent. This cycle still continues today. In the 1800s, an Indian tribe on Nantucket relied heavily on bluefish for food and fertilizer. When the population declined, the whole tribe starved. The takeaway here is that it is very difficult to regulate a mysterious fish and we need to be very careful. The SSB in 1982 was 700 million lbs and declined gradually to ~150 million lbs in 2014. This coincides with what fishermen have observed on the water in recent years. The 2-6 lb fish that anglers like to target are not as abundant as they once were. Bluefish are clearly in decline, but we do not know how critical this is. Recreationally, the bag limit should be cut down drastically from 15 fish. This bag limit is ridiculously high.

**Charles Witick:** Within MSA, one of the stated purposes is to create recreational catch and release programs. Yet, here we have a fishery with a large catch and release aspect. They say that if you are releasing those fish, we (managers) are going to take them away from you. That does not make any sense. The definition of optimum yield spans from food production to recreational opportunity, and both aspects are on the same playing field. We should be looking at managing the recreational sector by abundance and not penalizing anyone for releasing their fish.

**Joe Tangel:** The bluefish stock is not overfished and overfishing is not occurring. There have been rumors of a push to cut the recreational bag limit from 15 to 5 fish. I feel the stock has been managed properly and I do not see the reason for a proposed cut.

**Steven Cannizzo:** We do not have bluefish in NY and NJ anymore the way we used to. Warmer waters and changing habitat have altered prey availability and thus, bluefish abundance. After travelling over 35 miles of ocean at night, we at times, do not see any bluefish. This is unheard of in relation to past years.

The for-hire fishermen should be able to continuously take up to the 15 allowed fish if they choose to. They do not have to, but they should have the option. Those fishermen should not have the quota taken away because there are no fish in the ocean. It is not true; the bluefish are no longer here. Migratory patterns have changed, and bluefish are now further offshore being caught in 700 feet of water.

**James Foley:** Assessments need to be reevaluated because we are now finding bluefish way offshore. They are being caught on tilefish trips in 900 feet of water.

**Arnold Leo:** Regarding recreational, I support that recreational fisherman need more education about catching what you are going to eat, and then stop. Bluefish do not survive very well, especially in the surf and even on charter boats. This is an important aspect of recreational fishery.

**Steven Cannizzo:** (In response to questions regarding MRIP updates) So, you are only using two modes, he used private vessel and shore bound angler, and not for-hire. Which has noticeably dropped throughout the state of NY and NJ. The for-hire sector harvests the fewest bluefish compared to the other two recreational modes. And they are advocating that we are taking fish away from the other two modes, when in reality these two modes are taking all the fish. I just want to point out that it is not the for-hire sector that is not harvesting these fish.

**James Schneider:** I target bluefish from August 1 – November 30 on the night trip. We use to full day bluefish, but when we started the 10 fish limit, that ended full day fishing. We traditionally get the fish on the first moon of August and carry them until they leave around thanksgiving.

The difference between me and others commenting, is that I fish, every day. I started commercial fishing when I was 8 years old 1971. My son held a commercial lobster license when he was 2 years old before they put a limit on it. I have three members of my family in the commercial sector and two members in both. When we went to the 10 fish limit, we would carry a large group of ethnically diverse people that depend on substance fishing in order to feed themselves, and when it dropped to 10 fish that is when the full day trips went out of business. Fifteen boats stopped fishing all together. The previous comment that 15 fish is too many fish is not true for a family that makes \$18,000 a year. We educate our customers on catch and release and its moved to more of a catch and release fishery, but if that family that comes fishing once a year and wants to keep 15 bluefish, and we're not exceeding our recreational limit, we certainly should be able to keep those fish.

The care of bluefish has changed over the years. Now people bleed their fish, they put the head down in brine, and they bring it to the restaurant and it's delicious. When I first started fishing for bluefish in 1988, I bought my first party boat. I bought the boat from saving my money from working on fluke boats and a full night shift, 120 hours a week for 8-10 years until I bought my first party boat. (SHOWS IMAGE). This 650 lb mako shark, this shark at the time had 9 bluefish between 10-15 lbs in its stomach, and not a tooth mark in the bluefish. And this would happen every night. The blues would come in first, and then the sharks would come in after that and then everything would clear out. Now since we've pretty much ended recreational mako shark fishing by making the limit larger than most sharks that are in near shore waters we have unleashed this species of shark that goes across the ocean, same as the bluefish. They follow bluefish across the ocean and harvest them, daily.



**Timothy Froelich:** The accountability measures should apply in both fisheries. If you overharvest 250% well then you go 2.5 years without a recreational fishery, just like the commercial fishery. The recreational fishery is unhindered by any overage. It was just a biased plan to take away from the commercial side and redistribute to the recreational side.

2.5 TOMS RIVER, NJ

Thursday, June 28, 2018, 6:00 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
Brick Wenzel	SALTY5	Lawville, NJ 08735
Tom FAL	GAAS MFC	TA NJ
Heather Corbett	NJDFW	Port Republic, NJ
Shannon Madsen	NJDFW	Port Republic, NJ
Stacy VanMorter	NJDFW	Port Republic, NJ
Joanne Pellegrino	NOAA	Toms River NJ
John Pellegrino	—	FORKED RIVER NJ
Brian Neilan	NJDFW	Galloway NJ
Colleen Brust	NJDFW	Galloway, NJ
Chad Fouch	NJDFW	Galloway, NJ
Ed Ward	GSSA	B.L. N.J.
AL MARANTZ	JCAA/NBFCC	WALL, N.J.
Greg DiDomenico	GSSA	
Moath Henry	NJDFW	Port Republic NJ
EANIE YATES	UNITED BOATMAN DIS	BARNEGAT LT NJ
Lee GRICE	Rate	Waxton, Nc
ALAN KUNZE	OCELY	OCELY BEACH NJ
JOHN TOTH	JCAA/NJDA	MONROE TWP, NJ
Paul Hye, et al	FATC, BSC	Forked River, Seaside Park
Don MARANTZ	NBFCC, HREA	MILBURN TWP, NJ
CARE Benson	NJ Hal Summer Fender	Toms River NJ
Mary Benton	Teacher	Toms River
Jim	Wine Makers	Toms River
Rick Luedtke	GSSA	Toms River

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
HOWARD BOGAN	M/V JAMAICA	BRIELLE NJ
Dany Zernoch	Rutgers	Toms River, NJ
David Ribick	M/V Queen Mary	Pt. Pleasant Bch NJ
Rich Falcone	Golden Eagle	Belmar, NJ
Scott Suter	NJDFW	Toms River NJ
Michael Celestino	NJDFW	Port Republic, NJ

**Issue 1**

**Kevin Wark:** Supports goals and objectives already in place.

**Issue 2**

**David Riback:** Keep status quo.

**Eddie Yates:** Worried that if the split between commercial and recreation changes then recreational regs will also change. Bag limits are low in other species (fluke/black seabass) so they can't have a reduction in bag limits for bluefish. They do not let people on their boats ever catch the maximum, but large bag limit is a marketing tool. Low bag limits will destroy the for-hire sector. The system has worked fine for the last 12 years. Every port is feeling the decline of bluefishing. Everything should stay status quo for now until we have another stock assessment.

**Greg DiDomenico:** The commercial industry does not want to impact the recreational guys at all. The problems the recreational guys are seeing are not related to the rollovers as that has been done for 12 or 15 years. The rollover does not affect recreational fishing or bag size or limits. They (commercial guys) are seeing the same time of type of impact on the fishery (in reference to the decline many recreational guys were talking about on the water). He noted that the battle will be to save the NJ quota from the northern states.

**Howard Bogan:** Keep status quo.

**John Toth:** Against any recreational quota moving to the commercial sector. Believes a bluefish stock assessment needs to happen first. Mentioned the changing MRIP numbers and said he was not sure if the catch was actually higher for rec anglers. The recreational anglers want to rebuild stocks and not reduce them. Changing allocations may end up confusing fishing seasons and changing recreational fisheries. Party charter boats are going out of business because of other fisheries regulations so they need to have bluefish. Bluefish provides a safety belt for when other fishing gets tight.

**Kevin Wark:** Commercial landings were not captured properly in this time period (80s when the split was established).

**Paul Hartel:** Rec fisherman are underfishing but do not want their quota to be transferred to commercial (in reference to changing the percentages of the quota split between commercial and recreational sectors). There used to be massive runs of bluefish and the recreational guys are trying to conserve the fishery, and we need to rebuild the stock. The SSB is below the target, and he was outraged that Council and Commission are discussing transferring quota to commercial sector. He is also afraid that transferring will change the recreational regulations.

**Rich Falcone:** Keep status quo.

**Al Marantz:** Do not change the quotas between commercial and recreational at all. Party/charter depend on bluefish in the summertime.

**Issue 3**

**Chris Merone:** Does not want to reallocate quota between states since transfers work.

**Rick Luedtke:** Does not want to reallocate quota between states.

**Kevin Wark:** Supports commercial trade of allocation between the states. Does not support reallocation to the northern states. Concerned NJ will lose what it has earned.

#### **Issue 4**

**Brick Wenzel, Chris Merone, David Riback, Eddie Yates, Greg DiDominico, Howard Bogan, John Toth, Rich Falcone, Rick Luedtke, Al Marantz:** Keep status quo.

**Kevin Wark:** Commercial landings were not captured properly (in the 80s again) so we needed to have the rollover, but if the landings were captured correctly the rollover would not be necessary. That history needs to be brought up. But overall, keep status quo.

#### **Issue 5**

**David Riback:** Bluefish numbers have changed drastically after hurricane Sandy and beach replenishment. Need to research if these things are having an impact.

**Don Marantz:** We need up to date data (referring to an updated stock assessment and MRIP numbers) before doing an amendment.

**John Toth:** Bluefishing has not been good the past few years, they are going out and the fishing is spotty, this has been happening for the past 2 years.

**Kevin Wark:** Something inshore is happening that shifts bluefish all offshore. Beach replenishment is an issue that could be moving the fish offshore. He also noted that prey are booming recently but there are no predators. It should be a research priority to ask why fish are moving offshore. Saw young fish leaving and going down the beach this year and did see schools of small bluefish last year, would like to know why these fish are moving offshore

**Paul Hartel:** New MRIP estimates are coming out, would like to have that information and a new stock assessment before moving forward with the amendment

**Tom Fote:** Wants to see a 50-60 year historical catch estimate in future documents.

**Al Marantz:** There used to be 7 boats (charter) going out in Belmar and now there is only 1. There are not any bluefish around.

## 2.6 OCEAN CITY, NJ

Wednesday, June 27, 2018, 6:00 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
David A Holmes	Absecon Saltwater Sportsman	Brigantine, N.J.
Louis Sobott	n	GALLOWAY-NJ
Michael Komand	SJ Coastal Fly Anglers	Ocean City, NJ
Robert Hutchinson	SJ Coastal Fly Anglers	Ocean City, NJ
Josh O'Ganner	NJDA	North NJ, NJ
Chad Pounce	NJDFW	Port Republic, NJ
Matt Hoyt	NJDFW	Port Republic, NJ
Joseph Gerace	South Jersey Coastal Fly Anglers	Ocean City, NJ
Heather Orbett	NJDFW	Port Republic, NJ
Bradley Harrison	NJDFW	Port Republic, NJ
Jeff East	NJDFW	Port
Mike Celestino	NJDFW	Port
Colleen Brust	NJDFW	Port
Tom Baum		EHT, NJ
Jami Darrow	NJDFW	Port
Michael Celestino	NJDFW	Port Republic, NJ
William Collins	Recreational Fisherman	Glendora, NJ
John DePersenaria	Recreational Fishing Allium	New Britain, NJ
Greg DiNemico	GSSA	
FRED AKEKS	REC FISHER	NEWENGLAND NJ
MIKE SHLEPHERD	PROSS	Liawood, NJ
Adam Nowalsky	MAFMC	Port Republic, NJ
Victor Hartley	Miss Ocean City	Woodbine, NJ

**Issue 1**

No comments.

**Issue 2**

**John DePersenaria:** Bluefish are still very important to the recreational sector as revenue to the for hire industry, tackle shops, etc. This issue should be removed from consideration in this amendment at this time because there is no current problem, and MRIP changes will have an impact on the numbers.

**Bill Collins:** He has no problem with the recreational to commercial transfers but does not want the recreational allocation to be reduced as a result.

**Issue 3**

**Tom Baum:** He commented that it would be difficult to change the state allocations because landings are a byproduct of the quotas, which creates a conundrum. He said to be careful because if reallocation is based on transfers, then that would penalize states who have transferred quota away.

**Greg DiDomenico:** Bluefish has been and always will be important for the commercial fishery regardless of landings in a given year, and there is a concern that if NJ doesn't harvest its full commercial quota, the northern states will pursue reallocation and take fish away from NJ. It is important to remember that there are other issues such as gillnet restrictions and other regulations related to low landings, not just abundance, and this shouldn't be cause for reallocation.

**Issue 4**

**Greg DiDomenico:** We continue to support rollovers, especially if it doesn't cause problems in other sectors. This amendment should not make things adversarial between the sectors; there is no conflict. If the administrative burden can handle the transfers, then they should just do it. It's not worth it and a waste of time and resources, and would cause acrimony that doesn't exist. Streamlining could be from a temporal aspect; we need fish in the fall, so wrapping it up at the end of the year.

**Issue 5**

**Joe Gerace:** "Estimate" needs to be in capital letters. There is bias in the studies. Has it been shown that the estimates are actually valid?

**Bob Hutchinson:** Has a concern with the accuracy of the data being used to manage the fishery.

**Chuck Merimksy:** It is embarrassing how many bluefish were caught and killed 50 years ago, but now we can't catch anything. Where are they? It's sad.

2.7 DOVER, DE

Thursday, June 21, 2018, 6 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
E Shed A/ston		Dover DE.
JOSE MONTANER	MAYMC	"

No comments were provided at this hearing.

2.8 BERLIN, MD

Tuesday, June 26, 2018, 6 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
Jeff Yoalcum	Commercial Fisherman	Ocean City, MD
Merrill Campbell	SCOC Fisheries	Ocean City, MD
Vince Cannuli	Charter	Ocean City, MD
Jimmy Hahn	Fisherman - Commercial	Ocean City, MD
Sonny Gwin	Council	
Angel Willey	MD DNR	

**Issue 1**

**Merrill Campbell:** There is no problem with the status quo for FMP goals and objectives.

**Issue 2**

**Merrill Campbell, Jimmy Hahn and Jeff Yoalcum:** The sector allocations should stay status quo. They do not want to change a system that works.

**Issue 3**

**Merrill Campbell:** Status quo should be maintained; history is history and the allocations should stay as is. Reallocation is motivated by greed among the northern states.

**Jimmy Hahn:** Maryland needs the commercial quota it currently has because they don't have many other fisheries that can support them.

**Issue 4**

**Merrill Campbell:** The commercial transfer system between the states has worked for years, and that it can be used as a bargaining tool to get other fishery products. The recreational to commercial sector transfer seems like a great idea.

**Issue 5**

**Jimmy Hahn:** Expressed concern with the recreational harvest estimates, and said the recreational sector needs to have more accountability.

**Merrill Campbell:** Agreed that recreational harvest estimates are not reliable, need to be improved, and asked how management can be based on inaccurate reporting. The northern commissioners are throwing their weight around and want to take fish away from the southern states.

2.9 MANTEO, NC

Wednesday, June 20, 2018, 6 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
Dewey Hemilright	Com.	
George Harkness	non com	Manteo, NC
Andrew Spring	NCWU	Manteo, NC
Perry Beasley	NCWU	Columbia, NC
Perry Beasley		Columbia, NC
Joe Wilson		Wanchese, NC

Hearing summary provided by NC DMF staff

**Issue 1**

**George Harkis** asked for the definition of recruitment overfishing (objective #5).

**Joe Wilson** commented that recreational fishermen are more likely to catch small fish and effect recruitment overfishing. Recruitment overfishing is occurring due to recreational fishing.

**Perry Beasley** stated that there are not as many people commercial fishing for bluefish because the fish are further offshore and not worth going after when the market is poor. He thinks the wrong science is being used for many species. Preventing overfishing is fine for an objective, but overfishing isn't occurring with bluefish.

Several people commented that there is not much commercial waste, they can use different mesh gillnets to reduce discards, and spoiled bluefish can be used as crab bait. The commercial bluefish fishery is mostly being "regulated" by prices at fish house.

**Dewey Hemilright** wanted some clarification on what was meant by fishery waste as he doesn't consider using bluefish as crab bait as waste. Back in the 1970s and 1980s, beach recreational fisherman produced a lot of waste. He's concerned by the broad language of reducing waste in the current objectives.

**Issue 2**

**Dewey Hemilright** asked how close are commercial landings to the quota without a quota transfer from the recreational fishery? Would the commercial fishery be limited? Chris Batsavage referred people to Table 4 in the scoping document that shows the final bluefish quota transfers from the recreational fishery to the commercial fishery—the amount transferred varies annually.

**Mike Blanton** reminded the people that status quo is always an option.

**Issue 3**

**Dewey Hemilright** commented that North Carolina is not harvesting their quota. He thinks the quotas could better reflect the fishery, especially in relation to various state quotas and quota transfers. He suggests looking at the most recent 10 years to have quota reflect what is going on in the fishery to base allocations. Difference between the commercial summer flounder and bluefish fisheries in North Carolina is that bluefish quota is not being reached like summer flounder. He commented that it seems like the bluefish management process doesn't need much fixing. There is plenty of quota, so an adjustment to the quota allocations may be all that is needed. The quota transfer process seems to be working.

**George Harkis** said there needs to have more up to date data.

**Joe Wilson** commented that it sounds like the process has worked and commented that if commercial sells there is a trip ticket for that. The landings for the commercial fishery is accurate.

**Perry Beasley** claims that some recreational fisherman are catching and selling under the table. So, recreational data is not accurate.

**Chris Batsavage** posed the question if there is change in base years used to inform allocation how long that should be? Dewey has heard arguments for every 10 years. Chris also asked if 10 years a long enough time period for the commercial industry to set business plans. Everyone expressed the difficulty in addressing that question because the bluefish fishery is so variable. Access to the resource (weather, migration, predator-prey interactions, getting outside of inlet, market conditions, condition of other fisheries around bluefish, cost of gear for offshore fishing) is a concern.

**Mike Blanton** commented that fishermen are not always prepared for a fishery so they might miss a run. People may try to gear up and be prepared for bluefish if management provides opportunities to access the resource when it's available.

The general consensus was the most important thing for the commercial bluefish fishery is flexibility due to the many variables affecting the fishery.

**Issue 4**

The group was willing to continue allowing quota transfers to other states since North Carolina has the largest commercial allocation.

Several commented that state by state transfers seems to be working.

**Dewey Hemilright** suggested the possibility of setting up a quota bank. He doesn't want a state to have to shut down the fishery while waiting for a quota transfer. The bank would be available for whatever the state needed it like an overdraft insurance.

**Issue 5**

**Joe Wilson** asked if anything wrong with the bluefish population. He says they are staying offshore due to predation by bluefin tuna—beyond where the commercial bluefish fishery can catch them. Says bluefish the



commercial fishery catches are larger fish than the recreational fishery in North Carolina. He thinks looking at landings in poundage is inaccurate due to the fact that so many small bluefish are being caught by recreational anglers. He thinks that estimating fish by poundage isn't accurate for North Carolina. There seems to be two groups of bluefish based on body size and there are two different "bodies"/populations of bluefish: the large bluefish offshore in the winter and the large bluefish that migrate from the south through the estuarine waters in the spring. The presence of large bluefish in estuarine waters varies annually.

Several people considered identifying stock structure (inshore/offshore) contingents. Perhaps tagging to look for migratory patterns.

**Mike Blanton** commented that fishing on different stocks/populations along the species range should be considered.

Several people commented that bluefish serve as predators on smaller fish and are prey to large fish such as Bluefin tuna and other bluefish.

Several people commented on the changes in migratory patterns and distribution of bluefish.

**George Harkis** thinks that the stock structure is different. He thinks the eastern Florida stock is also in the Gulf of Mexico and that there is another stock up to the north. There may be two distinctive strains: migrants and those that don't. He wants to look at possible connection between mid-water trawls and low bluefish numbers in Maine. Has experience catching bluefish along most of the Atlantic coast.

Perry Beasley stated that the number fisherman is declining. Bluefish are there but the price is not always good enough to target. It is a fish house (market) issue.

**Joe Wilson** commented that back in the 1980s the fish were closer to shore, which made it cheaper to target them compared to today.

**Dewey Hemilright** thinks there are fewer bluefish available for the gill net fishery to catch over the last five years or so. He wants to know if ASMFC going to look at decline in bluefish effort. He also asked if there is going to be another meeting after scoping. Chris Batsavage answered that hearings on the actual amendment with issues and management options for those issues will probably be around this time next year. He also indicated that the more issues that are addressed in the amendment, the more time it might take to draft the amendment.

2.10 MOREHEAD CITY, NC

Thursday, June 21, 2018, 6 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
Glenn Skinner	NC Fisheries Assoc.	Morehead NC
Mike Q. Shytak	Carteret County News-Times	Morehead City, NC

**Issue 1**

No comments.

**Issue 2**

No comments.

**Issue 3**

**Glenn Skinner:** There would be some concern with reallocating quota because it might have an impact on North Carolina fishermen. North Carolina fishermen traditionally landed the majority of the fish and helped establish the quota. NC has the markets and fishermen.

**Issue 4**

**Glenn Skinner:** The transfer process seems to work well and provides flexibility to the states to move quota when needed. It seems like a waste of time to change it.

**Issue 5**

No comments.

2.11 TITUSVILLE, FL

Thursday, June 28, 2018, 6 p.m.

<u>Name</u>	<u>Organization/Sector</u>	<u>City, State</u>
Roy A. Coyle	Comm.	Melb. FL.
Tom Leggiche	Com	Melb. FL.
Stephen Shatto	COMM.	Grant FL.
Kuss Hansen	Rec	Titusville, FL
JIM BUSSE	Dealer	Cape Canaveral FL.
Mike Merrifield	Dealer	Titusville, FL

**Issue 1**

No comments.

**Issue 2**

**Mike Merrifield:** A 17% allocation to the commercial sector is relatively low.

**Jim Busse:** Seafood Atlantic landed 3/4 of what was brought in to dealers in 2017. Our fishermen have targeted bluefish more often in recent years and they show more effort because the price has steadily increased. There is also an increase in production. We are most likely responsible for most landings in the past. We can make money on bluefish, so I encourage fishermen to catch more. Other states land a lot of bluefish and saturate the markets before we target them. These fish are here, they are ours, and they will stay ours because we will keep our bluefish numbers at status quo. This fishery is being revitalized and we want to keep our quota. Do not reduce the allocation. Keep the fishery at status quo.

During the first 4 months of 2018, the ex-vessel value more than doubled to over \$1.00. We caught more in the first 4 months than all of 2017. The fishery is blossoming here due to bigger fish, harsh weather up north, not filling the demand up north, and fishermen here are now targeting these fish. We need to keep the current allocation.

Hook and line fishermen targeting Spanish mackerel have caught on to the bluefish fishery. The bluefish hook and line fishery has caught almost 50% of these values. The historical gill net/cast net fishery has changed to more of a hook and line fishery. The gear type for hook and line here is growing. I estimate that landings in 2018 will be double what they are now. We want to maintain status quo allocations.

**Tom Leggiere:** Keep the allocations status quo.

**Roy Coyle:** Keep the allocations status quo.

**Issue 3**

**Jim Busse:** Keep the allocations status quo. The more fish that come in, the stronger the market will be over time.

**Tom Leggiere:** Keep the allocations status quo.

**Roy Coyle:** Keep the allocations status quo.

**Issue 4**

**Tom Leggiere:** State-to-state transfers should not occur since we are hurting our economy by allowing them to flood our markets. \$0.40 will turn into \$0.20 very quickly.

**Issue 5**

**Mike Merrifield:** We need to start having more accountability for the recreational sector. The commercial sector is 100% accountable and is always dinged more. We have no control on the access of the resource to the recreational sector.

**Jim Busse:** The recreational sector needs to be just as accountable for overages as the commercial sector.

**Russ Hanson:** If MRIP numbers show the quotas have been exceeded, we should reduce the bag limit, so we do not have to change the quota. We also need to be very careful about saturating the market

## 2.12 INTERNET WEBINAR

Monday, July 16, 2018, 6 p.m.

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### Attendees

Cynthia Hanson – NOAA Fisheries (GARFO)

Rusty Hudson – Commercial (Daytona Beach, FL)

Joyce Rowley – Commercial Fisheries News (New Bedford, MA)

No comments were provided at this hearing.

## 3 WRITTEN COMMENTS

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**From:** Adam Sotiryadis <adamsotiryadis@yahoo.com>  
**Sent:** Wednesday, July 25, 2018 10:00 AM  
**To:** Seeley, Matthew  
**Subject:** Blue fish

Dr. Moore,

I am writing you to advocate against the bluefish allocation amendment. The last two seasons these fish have been scarce on Long Island, & I have been an avid fisherman for 40 years. As a writer for on the water magazine I am fortunate to correspond with many anglers both from boat & surfcasters. The information we share is always the same there are no bluefish around this season! Logically increasing the commercial allocation, to put more bluefish on the dock will result in less in the water, compounding a concerning situation and making it worse. I am happy to provide you with data from the NY State surfcasting contest over a period of several years that documents the decline in bluefish. As we know bluefish play a critical role in the food chain both as predator & prey, any increase will disrupt this natural balance & effect the ecosystem.

In closing please reflect on how many people first fell in love with fishing because of their first encounter with a bluefish & that great fight. For my family, my son Danny won the kids division in the NY state surfcasting contest when he was 11, a family moment we all cherish, BTW that fish was released!

Please feel free to call me if you wish to discuss this issue, my # is 917-371-8854

sincerely

Adam Sotiryadis

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**From:** Piperata <pip777@ptd.net>  
**Sent:** Friday, June 15, 2018 1:07 PM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Allocation Transfers

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Altho I am only a recreational fisherman, I can not believe that our Dept of Fish/Game keeps raiding the rewards to local friends, families, and fellow fishermen in order benefit private dinning industries in our state. Plus the fact that "Blues" are not typically the ultimate fish of choice on most dinning tables. Fishermen have greater skills and experience in preparing "Blues". The Commercial fisherman already has priority edges on the street-fisherman with Size-Limit and Catch quantities. Stop reversing the mission and intent of Conservation..... for the people, with the people, and by the people.....in order to further protect our NJ species. Keep the water, Blue, the fish Blue, and our skies Blue.....and stop the Commercial Industry from becoming "More Green!" Sincerely, Anthony J. Piperata, 236 Richline Hill Rd, Stewartsville, NJ 08886

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**From:** Bill Schott <wschott@mindspring.com>  
**Sent:** Monday, June 11, 2018 4:19 PM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Regulations

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I see no reason to change the bluefish management regulations. The stock is healthy and not over fished. I hate to over simplify things, but as the saying goes "if it ain't broke, don't fix it". Do not yield to the economic arguments from the commercial sector. Just because the recreational sector doesn't use its entire allocation, that doesn't give license to the commercial sector to grab the unused portion of the allocation. Maybe that's why the biomass is healthy and not over fished???

W.P. Schott  
110 Wehrli Road  
Long Valley, NJ 07853

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**From:** Bob Campbell <bobcampbell2010@gmail.com>  
**Sent:** Monday, July 9, 2018 8:13 AM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Amendment Scoping Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr. Seeley,

Thank you for accepting my comments here on bluefish amendment scoping, and for including them in public response materials for the DEEP Marine Fisheries Program, the Mid-Atlantic Fishery Management Council, and the Atlantic States Marine Fisheries Commission as they review and consider goals, allocations and strategies for our bluefish fishery.

I am a recreational catch-and-release fisherman who has fished in Connecticut's Long Island Sound waters for bluefish for twenty-eight years. I spend considerable dollars on this activity, as do many recreational fisher people pursuing this great fighting fish, here in Connecticut on gear, meals and other expenses.

My direct experience across numerous sites, verified by looking at any one of them, for example the Charles Island area of Milford, over the course of that time as well as even in just the past five to ten years, points clearly to a decline in number and size of bluefish. The trend line is quite clear.

Whether this is largely due, as with our stripers, to the current over-harvesting of Menhaden for fish oil, etc., or to other factors, the future and fate of this magnificent gamefish is in question when actual observational data is considered.

Commercial allocations for bluefish should, I believe strongly, be decreased, not kept at current levels and certainly not increased. I understand the hardship for these people when restrictions on their harvests are imposed, essential though that may be — my father's family farm had to close due to milk price reductions which necessitated finding other livelihoods (though that was ultimately the smart course of action for the future.)

Right now, the smart course of action for Connecticut and all ASMFC member states is to not let happen to our bluefish what we're letting happen to our stripers. Commercial harvest needs to be limited further if not banned. Recreation harvest as well needs to be further limited, if not made strictly catch-and-release at least temporarily.

There are those who will argue such measures are too severe. And when we irreparable damage our bluefish natural treasure, they will look for other scapegoat reasons as we always do. The fact remains it's our responsibility right now to do what we can, for the sake of our states' economies in terms of recreational dollars spent if not for the sake of the bluefish as a species, to protect them more effectively than we have.

Thank you Mr. Seeley, and please extend my thanks to DEEP, Council and Commission members who will decide the right thing to do for our bluefish,  
Bob Campbell  
Trumbull

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Coastal Conservation Association  
 Comments on Bluefish Allocation Amendment  
 To the Bluefish Management Plan  
 Mid-Atlantic Fishery Management Council / Atlantic States Marine Fisheries Commission  
 2018

To most anglers, bluefish are not a highly prized species like striped bass or even summer flounder. They are a cosmopolitan fish that have saved many a trip with their vicious strikes and strong fight. They are the third most important recreational species in pounds landed according to NOAA's latest information (2016), yet many more are released than kept. While they may not be a target species, they are an important component of the Atlantic coast recreational fishery.

As with all species managed primarily for the recreational sector, they should be managed for maximum practicable abundance. Yet according to the last stock assessment, as noted in Figure 2 of the scoping document, bluefish have been undergoing overfishing every year since 1985. This is no way to manage bluefish as a primarily recreational species.

Central to this tenet is the notion that fish in the water have value to recreational fisheries, and a lot of fish in the water have a lot of value. Yet managers persist in believing only landed fish have value. One of the goals of the FMP should be to manage for maximum economic value.

The MAFMC is correct in managing this species primarily for the recreational sector, defined as the commercial fishery not exceeding 20% of the total catch, and that should remain as a central goal in the FMP. Yet as a practical matter the MAFMC and ASMFC have likely violated this goal by routinely transferring quota from the recreational to the commercial sector every year since 2001. The original allocation was set in the early 1990's using previous catches by sector as the primary metric.

If the Council truly wishes to manage bluefish as primarily a recreational species and uses past catch history as the primary means of setting allocations percentages, then transfers between sectors should be abandoned.

It is time to use a different metric. Managing to an allocation set in past history makes little sense for today's fishery. The bluefish population has changed, the climate has changed and the number of fishermen pursuing bluefish has changed. In our view one of the better metrics to guide allocation decisions is maximum economic value. The council should be encouraged to take a step back and develop an allocation policy consistent with the NMFS national allocation policy that sets a series of triggers to start a reallocation process and sets a group of factors that will be used to set allocations. Currently, the only trigger that the council is using is that the recreational sector didn't harvest all they could. This is not fair nor is it in keeping with the national policy on allocation.

To manage for maximum economic value, one would have to compare the total value of fish in the commercial sector to the total value in the recreational sector. Total value on the recreational side is the sum of the value of caught fish, the value of a released fish and the value of access to take the fishing trip, summed across all anglers. As stated above, recreational anglers value abundance. One way to maintain the abundance they seek is by voluntarily releasing fish they catch to grow larger and be caught again. Allocating those uncaught fish to the commercial sectors robs the nation of that value and punishes the conservation decisions made by thousands of anglers. Setting allocations using just catch histories ignores the value being generated by a released fish. The current scoping document makes no mention of any other allocation factor other than catch histories.

1075 Tooker Avenue  
West Babylon, NY 11704  
June 26, 2018

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

Dear Dr. Moore:

I am taking this opportunity to provide comments with respect to the *Scoping and Public Information Document, Bluefish Allocation Amendment to the Bluefish Management Plan* (the "Scoping Document"). Such comments are based on more than 50 years' experience in the recreational bluefish fishery, most of which took place of southwestern Connecticut and in the bays and ocean waters off the South Shore of Long Island, New York.

My comments will be limited to Issue 2, Commercial and Recreational Allocations, and Issue 5, Other Issues.

!

## ISSUE 2

### COMMERCIAL AND RECREATIONAL ALLOCATIONS

**The current allocation, which grants 83% of the bluefish landings to the recreational sector and 17% to the commercial sector, is remains appropriate and should not be changed.**

A

**Corrected estimates of recreational bluefish landings, scheduled to be released on July 2, 2018, will probably demonstrate that anglers land, and often exceed, the entire recreational bluefish quota.**

The premise underlying any proposed change in the commercial/recreational allocation, that anglers regularly fail to land their entire allocation of bluefish, is probably fatally flawed. While current Marine Recreational Fishing Statistics Survey and Marine Recreational Information Program ("MRIP") data does suggest that recreational bluefish landings fall far short of the allocation, those landings estimates are being modified to reflect a new MRIP protocol,<sup>1</sup> with updated estimates scheduled to be released on July 2, 2018.

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<sup>1</sup> <https://www.st.nmfs.noaa.gov/recreational-fisheries/MRIP/effort-survey-improvements>



It is expected that such updated estimates will indicate that, on average, anglers fishing from boats caught 2.9 times as many fish as previously believed, while shore anglers' landings were 5.9 times as high as previously thought.<sup>2</sup>

Unfortunately, the hearing at which these comments were submitted was held on June 23, 2018, well before the revised estimates were scheduled for release. However, assuming that bluefish landings follow the general pattern and are not outliers, such landings for the five-year period 2013-2017, far from falling short of the recreational landings limit, probably exceeded such limit by 65% to more than 250%, depending on the year.<sup>3</sup>

The revised estimates, once released, may prove to be substantially lower (or higher) than revisions obtained simply by multiplying current shore-based and private/rental boat landings estimates by factors of 5.9 and 2.9, respectively. However, given that the current landings estimates would only have to be revised upward by anywhere between 12% and 44% for anglers to have caught their entire total allowable catch for the five years in question, there is almost certainly no justification for changing the allocation based on recent recreational harvest.

#### B

**Even if revised recreational landings estimates to not demonstrate that anglers landed their entire allocation of bluefish in recent years, recreational landings, and their relationship to recreational catch limits, are not the appropriate gauge of recreational activity in fisheries such as bluefish, which are dominated by catch and release**

While commercial fishermen must harvest fish in order to derive value from the resource, that is not necessarily the case in recreational fisheries. In the case of some species managed by the Mid-Atlantic Fishery Management Council (the "Council") and the Atlantic States Marine Fisheries Commission ("ASMFC"), such as summer flounder, scup, or black sea bass, anglers are fishing with the intention of harvesting at least some portion of their catch for personal use. However, in the case of other species, including bluefish, many anglers seek only the recreational experience of catching and releasing the fish, and have no intention of retaining any fish caught.

Such recreational fisheries, for what might be designated "sport" species, are very different from commercial and recreational "food" fisheries. Anglers' motivation for participating in them are different, and managers' goals and benchmarks need to be different as well.

In today's recreational bluefish fishery, where fewer than four out of every ten fish caught is harvested,<sup>4</sup> most anglers aren't seeking to maximize the number of fish landed and brought home, but rather to maximize the number of fish encountered and subsequently released. Thus, managers' goal should not be to maximize the number of fish killed and put on the dock, but rather to maximize the abundance of

<sup>2</sup> South Atlantic Fishery Management Council, *South Atlantic Update*, "Dr. Ned Cyr Addresses New Sampling Methods Leading to Changes in Recreational Fishing Effort Estimates," Spring 2018, p. 4

<sup>3</sup> Calculations based on data provided in personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, June 22, 2018; estimates for shore-based modes were multiplied by a factor of 5.9, while the estimate for the private/rental boat mode was multiplied by a factor of 2.9 and estimates for the party and charter boat modes were not changed from the original estimates.

<sup>4</sup> Mid-Atlantic Fishery Management Council, *Scoping and Public Information Document, Bluefish Allocation Amendment to the Bluefish Management Plan*, June 2018, p. 11

fish that remain in the water, because greater abundance leads to higher encounter levels and thus to greater recreational opportunity.

The concept of managing fish for greater recreational opportunity finds support in the Magnuson-Stevens Fishery Conservation and Management Act (“Magnuson-Stevens”).<sup>5</sup>

Magnuson-Stevens explicitly states one of its purposes as “to promote domestic commercial and recreational fishing under sound conservation and management measures, including **the promotion of catch and release programs in recreational fishing**. [emphasis added]”<sup>6</sup> Its definition of “optimum” yield refers to “the amount of fish which will provide the greatest overall benefit to the Nation, particularly with respect to food production **and recreational opportunities**... [emphasis added, internal numbering deleted]”<sup>7</sup>

Yet despite the clear mandate of the law, fishery managers have largely ignored the needs of recreational sport fisheries and the merits of promoting catch and release. Instead, as demonstrated by the Scoping Document itself, emphasis is placed solely on managing for food production, in the form of yield, and the requirement to place equal emphasis on recreational opportunity, in the form of increased abundance, particularly if it comes at the cost of decreased yield, is universally ignored.

The fact that federal fishery management documents do not even have language that expresses the concept of intentional releases made to benefit the health of the stock, but instead includes them under the catch-all term of “discards,” demonstrates how alien the concept is in our current management system. That stands in harsh contract to inland fishery managers’ approach, which uses catch and release as an important tool to manage recreational anglers. It is time for salt water fisheries managers to adopt their inland colleagues’ approach.

Reallocation of some portion of the recreational quota to the commercial sector, which would result in higher landings and a corresponding decrease in abundance, is contrary to Magnuson-Stevens’ purpose to promote recreational catch and release fisheries, and to put recreational opportunities on an equal plane with food production, and thus is contrary to the stated purposes and values of federal fisheries law.

### C

#### **Reallocating unharvested recreational quota to the commercial sector would discourage anglers from engaging in catch and release and voluntarily supporting conservation measures**

While today’s anglers release most of the bluefish that they catch, that wasn’t always the case. A chart in the Scoping Document, which tracks release practices back only to 1990, shows that anglers once released only about one-third of the bluefish caught.<sup>8</sup> The proportion released was even lower in previous years.

As I mentioned at the beginning of these comments, my experience in the fishery dates back to the mid-1960s. At that time, catch and release was virtually unheard-of in most salt water fisheries, and bluefish

<sup>5</sup> 16 U.S.C. 1801 et seq.

<sup>6</sup> 16 U.S.C. 1801(b)(3)

<sup>7</sup> 16 U.S.C. 1802(33)

<sup>8</sup> *Ibid.*, Mid-Atlantic Fishery Management Council, Scoping Document

was no exception. In the 1960s and early 1970s, virtually all bluefish caught were retained. In those days, there was no clear distinction between commercial and recreational fisheries; no license was required, at least in the northeastern states, to sell fish, and anglers who often caught large numbers of bluefish regularly sold their catch.

Anglers who didn't take their fish to market filled garbage pails, the standard "fish box" for small-boat bluefish anglers in western Long Island Sound in those days, with their catch, and before they even tied up at the dock were calling out "Who wants some bluefish?" to anyone standing nearby. If they had too few takers, as was typically the case, the dead fish were either dumped back into the water, forced onto reluctant neighbors who had little desire to take strong-tasting fish, made to taste even stronger by spending hours lying, uniced, in a garbage pail under the hot summer sun, or used to fertilize their gardens. Marina dumpsters, particularly those near charter and party boat docks, also received their share of unwanted bluefish.

Eventually, a conservation ethic began to permeate the fishery, the waste of previous years was decried, and release rates began to rise to the levels that we see today. At the same time, which overlapped the time that I sat on the Council, the increasing percentage of fish that were released led to an increase in the bluefish bag limit from 10 fish to 15.

Quite a few anglers asked why anyone would need to kill 15 bluefish at a time, but they were warned by some, less conservation-oriented members of the recreational fishing community that if anglers didn't kill their quota, the fish would just be given over to the commercial sector, who would be glad to harvest them. Such claim was supported by provisions of the bluefish management plan that allowed such transfers on a limited basis<sup>9</sup>, but most anglers still believed that catch and release had merit, and that killing fish just to prevent a reallocation of quota was not good policy.

Issue 2 of the Scoping Document is a message to anglers that their conservation efforts were pointless. If they still fed their bluefish to tomatoes and dumpsters, instead of returning them, alive, to the sea, landings would have remained high, and reallocation would never have been put on the table. But because they have chosen to become responsible, to return unwanted fish to the water in order to help conserve the stock and maintain if not increase bluefish abundance, recreational anglers have seen quota move from the recreational sector to the commercial sector on a temporary basis, and are facing the process of such transfer becoming permanent.

That sends exactly the wrong message to recreational fishermen. It tells them that their conservation efforts will ultimately be futile, because fish that they chose not to kill will only be reallocated to, and killed by, others. It turns the language of Magnuson-Stevens, which places recreational opportunity on the same plane as food production, into a lie, and frustrates the law's purpose of creating catch and release recreational fisheries.

Thus, from many standpoints, such reallocation is a bad idea.

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<sup>9</sup> Mid-Atlantic Fishery Management Council, *Amendment 1 to the Bluefish Fishery Management Plan*, Volume 1, 1998, p. 4

## D

**Bluefish support a relatively low-value commercial fishery, so reallocating quota from the commercial to the recreational sector would not make the best economic use of the bluefish resource**

Bluefish are critically important to the recreational fishery, particularly in the northeast, where the number of species available to anglers is relatively limited.

National Marine Fisheries Service (“NMFS”) data indicates that, in 2017, Atlantic coast anglers made about 1,350,000 trips with bluefish as the primary target; about 1,110,000 of those trips were taken in the New England and Mid-Atlantic regions.<sup>10</sup> Bluefish were also the secondary target of anglers on an additional 840,000 (750,000 in the New England/Mid-Atlantic regions) trips. While those figures clearly demonstrate the bluefish’s importance as a recreational species, mere numbers don’t convey the fish’s importance to anglers.

That’s because bluefish are “day-savers,” caught and enjoyed by anglers who were technically targeting something else, but were grateful for bluefish when they came along. That’s particularly true in the striped bass fishery, where the striped bass stock has fallen nearly to an “overfished” level,<sup>11</sup> and bluefish are often the only fish encountered on many trips made by striped bass anglers. Under such situations, it is the near-certainty of encounters with bluefish that motivate striped bass anglers to even make a fishing trip when they know that their preferred target is scarce; one charter boat captain I know very well, who caters to striped bass anglers in the New York Bight area, freely admits that bluefish saved his spring in 2018, when striped bass were often very difficult to come by. Without dependable action to keep his customers entertained, he probably would have booked far fewer trips that season, even though bluefish were not his customers’ primary target.

Anglers pursuing other species also see bluefish as a motivator to keep on making trips when their preferred target is scarce. I often fish for spring weakfish in Long Island’s Great South Bay, and depend on bluefish for action when the weakfish aren’t around, as has frequently been the case in recent years. And many shark tournaments in the New York area have added a prize category for the largest bluefish in an effort to attract anglers who feel that they have little likelihood of catching a prize-winning mako or thresher, but are at least in the running for the bluefish purse.<sup>12</sup>

Without an abundance of bluefish, anglers lose the certainty that bluefish will be available to provide opportunity when other species are absent, and will be less willing to make trips, and so provide economic benefit to coastal economies, as recreational fishermen are generally unwilling to fish when they know that the chances of catching anything are low.

Thus, it makes little sense to reduce abundance by reallocating fish released by anglers to the commercial sector. Bluefish are a low-value commercial fishery. The Scoping Document admits that “The relative value of bluefish is low among commercially landed species,” and quotes a \$0.71 per pound average price per pound for the period 2013-2017.<sup>13</sup> That’s far less than the roughly \$4.00 per

<sup>10</sup> Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, June 25, 2018

<sup>11</sup> Atlantic States Marine Fisheries Commission, *2016 Atlantic Striped Bass Stock Assessment Update*

<sup>12</sup> See, for example, the categories for the annual Bay Shore Mako Tournament, available at <http://bayshoretunaclub.angelfire.com/>

<sup>13</sup> *Ibid.*, Mid-Atlantic Fishery Management Council, Scoping Document, p. 16

pound commanded by more popular regional species, such as striped bass, black sea bass and summer flounder.<sup>14</sup> Even that average figure doesn't convey how little commercial fishermen receive for much of their quota. In New York, fishermen responding to early runs of bluefish typically flood the market with product, driving prices down to \$0.20 per pound.<sup>15</sup>

Creating market conditions that lead to such low prices for bluefish represents a poor use of existing quota, particularly when it costs approximately \$14 to pack and ship a 60-pound box of bluefish from the East End of Long Island, providing little or no opportunity for profit.<sup>16</sup> Reallocating quota from the recreational to the commercial sector, and thus creating the opportunity for more such supply/demand imbalances, represents poor management policy.

## II

### ISSUE 5

#### OTHER ISSUES

##### A

#### **Recreational fishery management should concentrate on maximizing abundance, rather than on maximizing landings.**

Recreational fishermen like to catch fish. A recent study indicated that catching fish was, by far, the most important determinant of a salt water angler's satisfaction with a fishing trip, while catching as many fish as possible for consumption, and catching a full bag limit of fish, rated among the lowest criteria of satisfaction.<sup>17</sup> Anglers in New England and the Mid-Atlantic were found to be typical in that respect.

That study largely reinforces the findings of an older study conducted by NMFS,<sup>18</sup> which found that 83% of anglers think that it is important to catch fish, while only 41% thought that it was important to take fish home to eat; that 95% of anglers believe that conservation measures are important to assure that

<sup>14</sup> Personal Communication from the National Marine Fisheries Service, Fisheries Statistics Division, June 25, 2018

<sup>15</sup> See, for example, Mid-Atlantic Fishery Management Council, Bluefish Fishery Performance Report, June 2017, p. 2, available at

[https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/597b6676cd39c3708a0a39a1/1501259385633/Tab03\\_Bluefish-2018-Specifications.pdf](https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/597b6676cd39c3708a0a39a1/1501259385633/Tab03_Bluefish-2018-Specifications.pdf); Mid-Atlantic Fishery Management Council, Bluefish Fishery

Performance Report, June 2016, available at

[https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/579b96aa46c3c4b8c179e48d/1469814452780/Tab08\\_Bluefish-Specs-2017.pdf](https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/579b96aa46c3c4b8c179e48d/1469814452780/Tab08_Bluefish-Specs-2017.pdf)

<sup>16</sup> Personal communication from Montauk commercial fishermen who asked to remain anonymous, June 25, 2018

<sup>17</sup> Brinson, Ayeisha A. and Kristy Wallmo, "Determinants of Saltwater Anglers' Satisfaction with Fisheries Management: Regional Perspectives in the United States," *North American Journal of Fisheries Management*, Vol. 37, Issue 1, 2017, pp. 225-234

<sup>18</sup> National Marine Fisheries Service, 2013 Saltwater Recreational Fisheries Opinions and Attitudes Survey, available at [https://www.st.nmfs.noaa.gov/Assets/economics/documents/rec-attitudes/Angler%20Attitudes%20Survey%20Fact%20Sheet%20FINAL%20\(Oct%202020\).pdf](https://www.st.nmfs.noaa.gov/Assets/economics/documents/rec-attitudes/Angler%20Attitudes%20Survey%20Fact%20Sheet%20FINAL%20(Oct%202020).pdf)

there are fish available in the future, and that 80% believe that recreational fisheries should be managed for an abundance of fish.

That being the case, managers of recreational fisheries, particularly those such as the bluefish fishery, which is dominated by anglers who primarily fish for recreation and not for food, should manage for abundance, which provides for increased recreational opportunity. Landings data are not appropriate for judging “use” in such fisheries, as recreational fishermen can and do “use” the resource without killing it; on the other hand, reallocating recreational quota to the commercial sector, whether on a temporary or permanent basis, has the effect of reducing abundance and thus reducing recreational opportunity and the economic benefits which that opportunity produces.

At a time when marine fuel is selling for nearly \$4.00 per gallon at many outlets catering to recreational fishermen, and even the most inexpensive artificial lures sold for bluefish cost \$7.50 or so (with many costing two or three times that amount), discouraging anglers from taking fishing trips by reducing abundance, so that commercial fishermen can sell additional fish at \$0.20, or even the average \$0.71, per pound makes little or no economic sense. Maintaining abundance at levels high enough to encourage anglers to go fishing frequently, knowing that they are nearly certain to enjoy frequent encounters with their quarry, will provide the greatest economic benefit from the bluefish resource.

That being the case, the Council should not consider reallocating uncaught, but still very much used, bluefish from the recreational to the commercial quota. If they feel it necessary to take any action at all, they should return to Magnuson-Stevens’ definition of “optimum” yield, and reduce optimum yield from where it is today to reflect the social and economic factors that militate in favor of an active, abundance-driven recreational fishery.

## **B**

### **Uncaught recreational quota has substantial economic value; such value militates against any reallocation of recreational quota to the commercial sector**

Abundance drives recreational effort, and recreational effort drives recreational fishing’s value to the economy. Effort data provided by NMFS<sup>19</sup> clearly demonstrates that fact, with the best example probably being striped bass effort figures that show effort increasing steadily from the period during the 1980s when the stock had collapsed, through stock recovery in the mid-1990s, with effort peaking between 2003 and 2007 when biomass peaked, then declining again as the biomass also declined.<sup>20</sup>

Thus, to maximize the relatively high-value recreational bluefish fishery, the Council should recognize the value of abundance, and thus the value of uncaught recreational quota that is allowed to remain in the water to be caught not only once, but multiple times. Furthermore, in part for reasons already explained in section IIA of these comments, the Council should seek to increase the abundance of bluefish available to anglers, and so encourage anglers not to harvest their entire quota, rather than reallocating such very much used, but unharvested, quota to the commercial sector

<sup>19</sup> NOAA Office of Science and Technology, Recreational Fishing Statistics Queries, available at <https://www.st.nmfs.noaa.gov/recreational-fisheries/data-and-documentation/queries/index>

<sup>20</sup> Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, June 25, 2018, combined with biomass data from Atlantic States Marine Fisheries Commission, 2016 Atlantic Striped Bass Stock Assessment Update

C**The Council should investigate approaches that would make better economic use of the commercial bluefish quota**

Much of the commercial bluefish quota is currently being squandered.

As already described in section ID of these comments, a large proportion of that quota, at least in New York, is being caught within a short period, when it floods into the market at a price too low to provide a meaningful benefit to the fishermen who catch it.

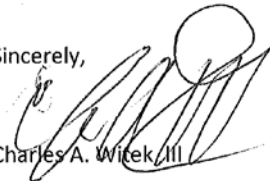
Such situation is not unique to bluefish, but is endemic in any minimally regulated derby-style fishery, in which commercial fishermen feel compelled to land as many fish as possible, regardless of price, to make use of available quota before it is filled by others.

That being the case, fishery managers should consider means to reduce the amount of bluefish that is available to the market at any one time. Doing so will probably require close cooperation between the Council and ASMFC, which should investigate and consider measures such as seasonal and regional quotas, tailored to match bluefish landings with the requirements of the markets. Requiring states to reduce trip limits during periods of low demand would also lead to better use of available quota.

Such regulations would provide a better alternative to increasing the commercial quota, which does nothing to encourage fishermen to make better economic decisions; instead, it merely encourages them to oversupply markets during times of low demand, and to harvest additional fish at the expense of the recreational sector, which could utilize the same resource to expand recreational opportunity.

Thank you for considering my views on this matter.

Sincerely,



Charles A. Witek, III

**From:** Cody McLaughlin <codymclaughlin.work@gmail.com>  
**Sent:** Tuesday, June 26, 2018 1:11 PM  
**To:** Glnn:  
**Cc:** John Toth (tothjohn@verizon.net); SERGIO RADOSSI; Seeley, Matthew; Anglerpmh; Dan Harrison; Ray Szpond; Joe Zagorski; Herb, Dick  
**Subject:** Re: "Bluefish Allocation Amendment Scoping Comments"  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Gentlemen,

The NJOA also just published a petition - which we'll present the number of if we get enough signups beforehand.

Success page also goes to the comments page and copy is provided in case someone wants to submit commentary:

<https://mailchi.mp/njoutdooralliance/keepbluefishrecreational>

On Tue, Jun 26, 2018 at 1:05 PM, Glnn: <[cristori@aol.com](mailto:cristori@aol.com)> wrote:

Pass it along!

Al

Al Ristori

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

-----Original Message-----

From: John Toth <[tothjohn@verizon.net](mailto:tothjohn@verizon.net)>

To: sradossi <[sradossi@verizon.net](mailto:sradossi@verizon.net)>; mseeley <[mseeley@mafmc.org](mailto:mseeley@mafmc.org)>

Cc: AnglerPMH <[AnglerPMH@aol.com](mailto:AnglerPMH@aol.com)>; DHarrison <[DHarrison@cdtresources.com](mailto:DHarrison@cdtresources.com)>; rayszpond <[rayszpond@gmail.com](mailto:rayszpond@gmail.com)>; codymclaughlin.work <[codymclaughlin.work@gmail.com](mailto:codymclaughlin.work@gmail.com)>; jzagorski <[jzagorski@crossroadsaudiovideo.com](mailto:jzagorski@crossroadsaudiovideo.com)>; cristori <[cristori@aol.com](mailto:cristori@aol.com)>; fish5271 <[fish5271@gmail.com](mailto:fish5271@gmail.com)>

Sent: Tue, Jun 26, 2018 8:49 am

Subject: Re: "Bluefish Allocation Amendment Scoping Comments"

Serge,

Good response!

JT

-----Original Message-----

From: Sergio Radosi <[sradossi@verizon.net](mailto:sradossi@verizon.net)>

To: mseeley <[mseeley@mafmc.org](mailto:mseeley@mafmc.org)>

Cc: John Toth <[tothjohn@verizon.net](mailto:tothjohn@verizon.net)>; Paul Haertel <[AnglerPMH@aol.com](mailto:AnglerPMH@aol.com)>; Dan Harrison <[DHarrison@cdtresources.com](mailto:DHarrison@cdtresources.com)>; rayszpond <[rayszpond@gmail.com](mailto:rayszpond@gmail.com)>; codymclaughlin.work <[codymclaughlin.work@gmail.com](mailto:codymclaughlin.work@gmail.com)>; Joe Zagorski <[jzagorski@crossroadsaudiovideo.com](mailto:jzagorski@crossroadsaudiovideo.com)>; Al Ristori <[cristori@aol.com](mailto:cristori@aol.com)>; Herb, Dick <[fish5271@gmail.com](mailto:fish5271@gmail.com)>



Sent: Tue, Jun 26, 2018 10:46 am  
Subject: "Bluefish Allocation Amendment Scoping Comments"

Dear Dr. Chris Moore, Ph.D., Executive Director,

It is understood that the Mid-Atlantic Fishery Management Council and the ASMFC are holding scoping hearings to gather information to be considered in the Bluefish Allocation Amendment which is being pushed by commercial interests seeking to slice off a greater percentage of the bluefish allocation for commercial fisheries.

Given that the sustainability of our recreational fisheries are already being stressed by reduced availability of Summer Flounder, Black Sea Bass, Winter Flounder, Weakfish, Striped Bass, Mako Shark, Tuna, Cod, Tautog, etc....., **the loss of bluefish access to the recreational community is unacceptable.**

Quoting Mr. Al Ristori from his blog, Tight Lines, *"This wouldn't be acceptable under any circumstances, but is particularly dangerous at this time when bluefish abundance seems to be declining.*

*Recreational fishermen are being punished for releasing such a large percentage of their bluefish catch, which makes it appear that they're not interested in that fishery. In actuality, we've generally had a hard time seeking blues in recent years"*

I respectfully request that the MAFMC and ASMFC leave the bluefish allocation and quotas as is. Please do not further punish the recreational community.

Further, I respectfully request that the MAFMC's and ASMFC's limit resources be focused on existing unresolved issues. Let's fix the problems we have first. Let's have some successes, before looking for other problems.

Thank You

Sergio Radossi

Recreational Angler and Recreational Representative for the New Jersey Marine Fisheries Council

**From:** nmfs GARBluefishAmend - NOAA Service Account <nmfs.garbluefishamend@noaa.gov>  
**Sent:** Monday, June 25, 2018 7:48 AM  
**To:** Seeley, Matthew; cstarks@asmfc.org; Cynthia Hanson - NOAA Federal  
**Subject:** Fwd: ER 18/0258 - NOI, Amendment to Bluefish FMP, Fisheries of the NE US, Bluefish Allocation Amendment Scoping Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi All,

Just forwarding an email comment we received from the NOI FR posting. This one is actually a "no comment" comment from the FWS.

No other comments have been received to this email yet.

----- Forwarded message -----

**From:** Jeannine Dube <[jeannine\\_dube@fws.gov](mailto:jeannine_dube@fws.gov)>

**Date:** Fri, Jun 22, 2018 at 10:04 AM

**Subject:** ER 18/0258 - NOI, Amendment to Bluefish FMP, Fisheries of the NE US, Bluefish Allocation Amendment Scoping Comments

**To:** Stephanie Nash <[stephanie\\_nash@fws.gov](mailto:stephanie_nash@fws.gov)>, [nmfs.garBluefishAmend@noaa.gov](mailto:nmfs.garBluefishAmend@noaa.gov)

**Cc:** David Simmons <[david\\_simmons@fws.gov](mailto:david_simmons@fws.gov)>, "Lazinsky, Diane" <[Diane\\_Lazinsky@ios.doi.gov](mailto:Diane_Lazinsky@ios.doi.gov)>, "Raddant, Andrew" <[Andrew\\_Raddant@ios.doi.gov](mailto:Andrew_Raddant@ios.doi.gov)>

David Simmons of the New England Field Office has requested that I submit a no comment on the subject ER.

Jeannine Dube

--

Secretary  
New England Field Office  
U.S. Fish and Wildlife Service  
[70 Commercial St., Suite 300](#)  
[Concord, NH 03301](#)  
[603-223-2541](#)

"You only live once, but if you do it right, once is enough." Mae West

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**From:** dpesante dpesante <dpesante@cox.net>  
**Sent:** Tuesday, July 24, 2018 10:30 PM  
**To:** Seeley, Matthew  
**Cc:** julia.livermore@dem.ri.gov  
**Subject:** Bluefish Scoping

Hi Mr Seeley. My name is Dean Pesante. I am the owner operator of the F/V Oceana a gillnet vessel based out of Point Judith R.I. Our primary target species is Bluefish. Over the course of the last five years or so it has become very apparent that the Bluefish are more abundant in our waters. This is obvious if you look at the coast wide landings. We have consistently gone over our quota being forced to transfer quota from the southern states who have consistently landed much lower than their allotted quota. I think it's clear that the trend has been for Bluefish to be more abundant to the North. Therefore I would recommend the percent of the coastwide quota be adjusted with a higher percentage going to the northern states. The numbers speak for themselves. Please take this into consideration. Thank you. Dean Pesante

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**From:** EJDSR251 <ejdsr251@aol.com>  
**Sent:** Sunday, June 17, 2018 10:36 PM  
**To:** Seeley, Matthew  
**Subject:** the nre proposed rules

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

All I will say is that between you and our government you have destroyed the whiting fishery, the ling fishery, the striped fishery, and the fluke fishery and now you want the bluefish fishery.

No way, no how.

---

**From:** George Govlick <ggovlick@icdmail.com>  
**Sent:** Tuesday, June 5, 2018 1:37 PM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Management Comment

Hello Matthew,

One thing that has always bothered me about the NJ Bluefish bag limit is, the no minimum size limit @ 15 fish. Of course children catching snappers is a fun part of growing up and the angling maturity process in NJ and other coastal states. However, I have seen many adults keep their limit and I feel this taxes the resource too much.

Let'm grow up a little and impose at least a 10" minimum size limit for 6-8 fish max. Maybe 4-5 smaller ones can be kept for fluke (doormat) bait only....

Thanks

Best Regards,

**George Govlick**  
*Project Manager / Inside Sales Team Leader*  
o: +1 732-918-9000 x5239

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**From:** captgordon@gmail.com [mailto:captgordon@gmail.com]  
**Sent:** Tuesday, June 12, 2018 5:50 PM  
**To:** Batsavage, Chris <chris.batsavage@ncdenr.gov>  
**Subject:** [External] Re: Mid-Atlantic Fishery Management Council and Atlantic States Marine Fisheries Commission to Hold Scoping Hearings for Bluefish Allocation Amendment

**CAUTION:** External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to [Report Spam](#).

1

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Do not transfer the unused recreational quota to commercial sectors. Let the uncaught fish live and reproduce so we can have a bigger population of fish in the water.

Gordon

---

**From:** Jimmy <jps0886@gmail.com>  
**Sent:** Monday, June 18, 2018 4:37 PM  
**To:** Seeley, Matthew; Moore, Christopher  
**Cc:** Augustine, Pat; 'Crescenzo Abbatiello'; joseph.amilicia@transdev.com; 'Louis Falsetta'; mcellan@sewanhaskaschools.org; 'Gene'; 'Lustig, Loren'; 'Irene Sabatelli'  
**Subject:** Reallocation of Bluefish quotas  
**Attachments:** image001.png

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To Whom It May Concern,

I have been fishing for 40 years and have seen firsthand the highs and lows of our fisheries which I believe are mostly a direct result of management. I strongly urge you not to transfer the recreational quota to the commercial fishery for my reasons below.

As a kid in the mid 1980s I vividly remember seeing big schools of large, marauding Bluefish going down the beaches of Fort Tilden in the Rockaways. I would start seeing these schools around the 2<sup>nd</sup> to 3<sup>rd</sup> week of August and they would continue well into October and sometimes into the beginning of November depending on how cold it got. For the past number of years this hasn't been the case. The fishing for big blues has been pretty horrible for a number of years now. Outside of having a decent shot of some big Blues for a few weeks in the Spring, they are non-existent for the rest of the year, including the Fall. A healthy fishery is one that goes on for months at a time and is not confined to a few locations for a brief period of time which the chart below from the ASMFC seems to reinforce my experience as a kid.

I have spoken with other fisherman, members of the ASMFC, scientists, fishery managers, etc. and for the most part, none of us know exactly how many actual Bluefish there are. I've heard some people say the fish are offshore but in my experience when there is a healthy population of fish around, both the surf fisherman and boat fisherman alike are able to partake in good fishing. Since we are not able to count every fish in the ocean, nor do I think we even need to, we should manage this shared resource carefully and on the conservative side because if we are wrong, and we cull too many, overfishing will continue and we may get to the point of no return.

Fishing for Striped Bass and Bluefish is becoming so bad by me, I am probably going half the amount of times I used to go just a few years ago. I have friends that hardly ever go now due to the lack of fish to catch. Do people really need to take 15 Bluefish per outing? If we are going to continue to have a viable fishery for all to enjoy, more measures need to be taken to reduce the catch, not increase it. Please take this into consideration and feel free to reach out to me with any questions.

Thanks,  
James Sabatelli

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**From:** Jean Public <jeanpublic1@yahoo.com>  
**Sent:** Sunday, June 24, 2018 3:51 PM  
**To:** Seeley, Matthew; info@pewtrusts.org; info@peta.org; humanelines@hsus.org  
**Subject:** ublic commetn on scoping hearings for bluefish allocation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

IT IS VERY IMPORTANT THAT YOU SAVE THE TAXPAYERS DOLALRS AND HAVE ONE INTERNET MEETING ON THIS ISSUE WHICH CAN BE HELD OVER TWO DAYS FOR THE ENTIRE NATION. ALL OF US WANT TO HEAR WHAT THE COMMERCIAL FISH PROFITERS SAY TO YOU THAT CAUSES SUCH EXCESSIVE CATCHES AS THEY GET. WE ARE SICK OFYOUR H AVING THESE PRIVATE HEARINGS IN 12 DIFFERENT LOCATIONS WHERE NOBODY KNOWS WHAT IS BEING SAID. IT IS TIME TO SWITCH TO INTERNET MEETINGS WHERE THEY ARE RECORDED AND POSTED ON THE YOUR WEBSITE. WHY ARE YHOU ACTING AS IF WE ARE STILL IN 1930 WHEN WE HAVE THIS 2018 WAY TO TAKE PUBLIC CMOMENT. IT IS TIME FOR ALL OF US TO HEAR WHAT THE OTHERS SIDE IS SAYING. WE CANT AFFORD TO GO ALL AROUDN THE NATION TO 12 SITES TO HEAR THAT. BUT WE CAN IF YOU DO IT IN AN OPEN PUBLIC FORUM.

I KNOW YOU DONT WANT TO BE OPEN AND TRANSPARENT.YOU PREFER YOUR LOCALIZED PLAYTIMES WITH THE COMMERCIALFISH PROFITEERS AND TO SCREW THE AVERAGE AMERICA WHO OWNS ALL THIOSE FISH THAT ARE GONIG TO EXTINCTION BECAUSE OF SO MUCH TAKE INT EH MOS CRUEL WAYS THAT ARE EXISTING TODAY.

TO ALLOW TRAWLING FOR EXAMPLE WHEN YOU KNOW IT WIPES OUIT THE BOTTOM OF THE SEA FOR LONG \LONG TIMES IS CRAZY, INSANE. IT IS TIME TO CUT ALL QUOTAS FOR BLUEFISH. COMMERCIAL FISH PROFITEERS ARE TAKNIG TOO MUCH. THIS COMMETN IS FOR THE PUBLIC RECORD. PLEASE RECEIPT. JEAN PUBLIEE JEAN PUBLIC1@GMAIL.COM

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**From:** Jean Public <jeanpublic1@yahoo.com>  
**Sent:** Monday, June 25, 2018 5:41 PM  
**To:** Contact MAFMC; Seeley, Matthew; info@pewtrusts.org; humanelines@hsus.org; info@peta.org; info@taxpayer.net; media@caqw.org; info@afphq.org  
**Subject:** Fw: public comment on federal register

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

all quotas for blues and flounder shoudl be cut by 50%. taking information from commercial fish profiteers who are renowned for taking it all and having no fish left, are bogus. we cant take that information any longer. we are being played for suckers by them this commetn is for the public record. why are you only meetnig l/2 day each day for two days. why not one day and cut the hotels bills that you send to the taxpaeys of this country. why should we be paying for hotels and meals for your vacaton time/ why not do this meeting on internet and save us all tax dollars. and budget costs. please receipt. stop playing the taxpaeys for all you can get will yoo. jean publiee jeanpublic1@yahoo.com

**From:** jetiii <jetiii@optonline.net>  
**Sent:** Friday, June 15, 2018 12:08 PM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Management

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I like catching and releasing large bluefish on the fly rod, a few small ones are okay to eat if prepared well. I usually release my catch safely though. There is almost no reason to take and keep a large one other than as a trophy. There should be limits on larger fish greater than 28" and an unlimited catch of the species is ridiculous. Even a limit of 15 fish is a waste of this resource. What really bothers me while Fishing is party boats gaffing and putting holes in every fish their customers catch. They should be required to net their catch and return safely all fish over a certain size and strict limits to the number of smaller fish kept. When in schools, blues are easy to catch with shiny lures. I however, fly fish exclusively for them and find them good sport. This method is much more sporting and difficult to do. Maybe a fly fish rule could be enacted that is more lenient. Bait Fishing for them with bunker chunks is almost like cheating. Over time, I have noticed a marked decline in bluefish numbers in the fall time period. Maybe a Bluefish season would also help, but with an exclusion for fly fishing. Trolling multi-lure rigs is also something that should be discontinued immediately and a single hook on all lures, be considered in order to save them from treble hook damage and overfishing.

JET III

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**From:** joe tropea <jstropea@yahoo.com>  
**Sent:** Friday, June 15, 2018 12:40 PM  
**To:** Seeley, Matthew; Seeley, Matthew  
**Subject:** Blue Fish

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

What is up with the blue fish & how can I help. Its pretty bad when the blue fish count is down. Just like the blueback herring. Wiped out by the giant commercial ships. No way can people with fishing poles wipe out any kind of fish in the ocean. Only commercial fishing kills what we all fish for.

Thanks  
Joe Tropea

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**From:** Jordan Jernigan <jvjernig@gmail.com>  
**Sent:** Wednesday, June 20, 2018 8:02 AM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Allocation Amendment Scoping Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please keep current bluefish allocation limits the same.

Bluefish are an extremely important recreational fish in North Carolina and one of the few fish that can be caught consistently for recreational anglers.

Thank you.

Jordan Jernigan  
Recreational Angler  
North Carolina

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*Commonwealth of Massachusetts*  
**Marine Fisheries Advisory Commission**  
 251 Causeway Street, Suite 400  
 Boston, MA 02114  
 Fax (617) 626.1509



**Raymond Kane, Jr**  
 Chairman

**Michael Pierdinock**  
 Vice Chairman

**William Doyle**  
 Clerk

**Kalil Boghdan**

**Charles Quinn**

**Andrew Walsh**

**Lou Williams**

**Arthur Sawyer**

**Tim Brady**

July 30, 2018

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

Dear Dr. Moore,

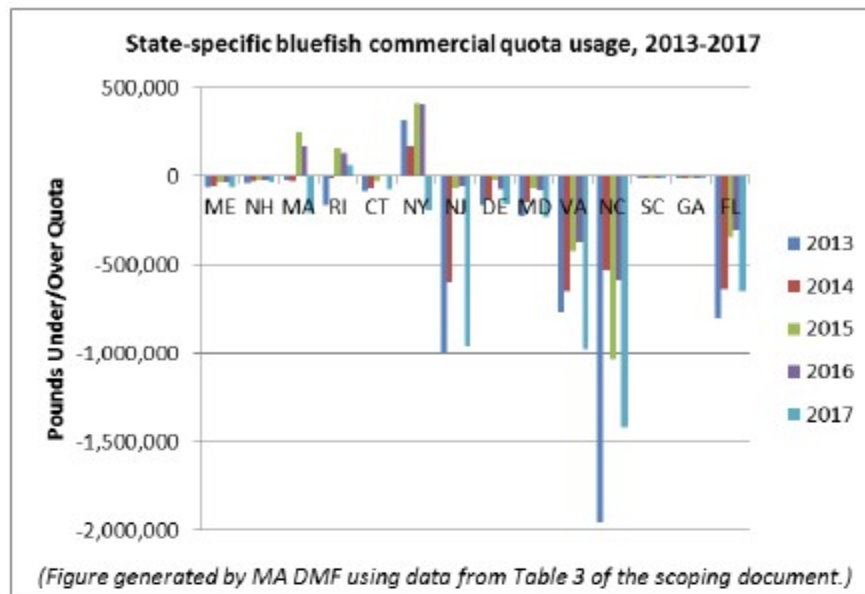
The Massachusetts Marine Fisheries Advisory Commission (MFAC) offers the following comments on the Scoping and Public Information Document for the Bluefish Allocation Amendment.

Issue 2: Commercial and Recreational Allocations

The MFAC recommends caution regarding revision to the commercial and recreational allocations for bluefish. Both fisheries are of historical and contemporary importance in Massachusetts. The existing allocations (with accompanying transfer provisions) have adequately supported both the commercial and recreational fisheries in the Commonwealth over the long-term. The objectives for any proposed revisions need to be defined in the draft amendment. Options should be considered in conjunction with any changes to the transfer provisions. The recalibrated recreational harvest estimates (i.e., MRIP) need to be evaluated and considered during decision making, as well as an updated stock assessment incorporating those data. There are indications that the stock is currently in a declining phase of its cyclical nature; the management program needs to be able to withstand such oscillations.

Issue 3: Commercial Allocations to the States

The MFAC supports reconsideration of the commercial allocations to the states. A comparison of recent state-by-state quotas to landings in the scoping document (Table 3) indicates a trend of consistent quota surpluses in some states and quota deficits in others. We recommend that a figure of the same data, such as that shown below, is used to display this trend more clearly in the draft amendment. Moreover, the draft amendment should examine and describe likely reasons for each state's quota performance, such as changes in regulations, effort levels, and resource abundance and distribution. Understanding the causes will help in the development of specific options for this issue. The MFAC considers this the most pressing matter in the scoping document to address.




#### Issue 4: Quota Transfers

The MFAC highlights the role that quota transfers have played in supporting Massachusetts' commercial bluefish fishery. The fishery would have been significantly constrained in many recent years without one or both types of quota transfers allowed under the plan having been utilized.

The recreational-to-commercial quota transfer has provided flexibility to the management system to achieve the total annual harvest limit. Whether any changes are warranted will depend in large part on the outcome of Issue 2. The draft amendment will need to address the impact of revised recreational harvest estimates on this issue.

State-to-state commercial quota transfers have enabled the Massachusetts fishery to avoid premature quota closures when bluefish have been highly available in local waters. Such transfers have routinely been obtained from a handful of states. State-to-state commercial quota transfers are also valuable to mitigate small, unintended quota overages. The continued availability of this management tool, which the MFAC supports, must not be used as an excuse for inaction on Issue 3. The MFAC also suggests that the Plan Development Team consider whether there are any biological reasons to limit the geographic range of state-to-state transfers (e.g., the donor and recipient states being within certain regions).

Sincerely,

  
Raymond Kane, Chair

Cc: MFAC Members  
David Pierce, DMF

-----Original Message-----

From: Mike Bobetsky [mailto:wannafish@optonline.net]

Sent: Saturday, June 23, 2018 3:30 PM

To: Caitlin Starks <cstarks@asmfc.org>; alvillarosa@verizon.net; Blanche Goodman <Justdear@verizon.net>; Steven Goodman <steveng32@verizon.net>; sdubon@aepest.com; Sheila Patton <ttksmp@gmail.com>; Ted Solomon <nopanegain@aol.com>; Tom\_Mckelvey@yahoo.com; Dennis Cataldo <Dmclife@aol.com>; bigpoppi01@verizon.net; Jodi Freind <Jodis83@aol.com>; LJRiccobono@aim.com; carolinecino@gmail.com; Rico Rienieri <enricoranieri9@gmail.com>; Ken Bell <forbelz@aol.com>; Ken Eldi <keldi1@optonline.net>; Willie Pellemonte <williampiemonte@yahoo.com>; jeffbp142@gmail.com; rm72761@aol.com; Heather Bernot <heather@meseronsales.com>; Michael Lowenstein <alideb@aol.com>; Mitchell Gootnick <MitchellGootnick@gmail.com>; mjn2@aol.com; phowe8834@gmail.com; Hcolflesh@gmail.com; Reed Riemer <ReedRiemer1@aol.com>; lindenmitchell39@aol.com; Joe Columbo <jcolumbo@wilmingtoncap.com>; Pezpal725 <Pezpal725@aol.com>; Asmds@aol.com; John Patton <hookfishnow@gmail.com>; Rich Geyer <rbell602@aol.com>; suebert2@aol.com; MARC K.HOFFMAN <mkhoffman@optonline.net>; amtteach@optonline.net >> Ann Tiss <amtteach@optonline.net>; gbob33@AOL.COM; wannafish@optonline.net; Matt Sutphin <matthebayrat@gmail.com>  
Subject: Scoping for bluefish allocation ammendment

Hello,

I am writing to you to express a few ideas about this bluefish Allocation ammendment to the management plan that is on tap.

1

I have been fishing for bluefish on and off for the better part of 40 years. I have seen many strong years followed by many lean years for no apparent reason, often in successive years. Forever an old adage about bluefishing after a full moon shuts them off and storms relocate schools offshore , etc etc, lend credence to the skittish and cyclic nature of bluefishing. Please understand that while it may seem that there is a lack of fish many times, like here in NY last season, the fish are all of a sudden here one day gone the next and there isn't a lot of pressure from the recreational sector and we shouldn't be limited when the fish are accessible to small boat recreation anglers, or pier fisherman who's first experience with fishing is catching snapper blues off a bulkhead .

The current allocations should be kept in place and the left over quota distribution to the commercial sector needs to be kept to a max of 75 percent while juvenile snapper blues should be limited to 6 or 7 not 10 or more of under 12 inches this is just in case there is a variable that we haven't identified yet as a problem. This errors on the cautious side even tho admittedly there isn't over fishing taking place and the stocks are not over fished. I also urge the consideration of the habitat destruction and how to limit its effect across the coast and the taking of forage fish such as bunker up and down the east coast to be limited strictly as bluefish will ride herd on those schools and inevitably will be collateral damage.

I write this not just as a lifelong recreational fisherman who has 2 boys liking fishing and who is always spending good money to keep fishing , but as a boat owner, a person who doesn't take fish for the sake of taking them but takes what i will consume, but also as a President of a fishing club comprised of same minded anglers who need to know that the management gurus don't execute plans that will make fishing a thing of the past.

Please do not change the allocations

Sincerely

Mike Bobetsky

President

Atlantis Anglers Association

www.atlantisanglers.com

**From:** Michael Pierdinock <cpfcharters@yahoo.com>  
**Sent:** Thursday, July 12, 2018 11:15 AM  
**To:** Seeley, Matthew  
**Cc:** Meserve Nichola (FWE); McKiernan, Dan  
**Subject:** Comments to The Bluefish Allocation Amendment to The Bluefish Management Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Matt:

The following comments are provided on behalf of the RFA of Massachusetts:

Issue 2 - The recent MRIP bluefish estimates of total harvest for private recreational and private boating recreational anglers has increased 3 times higher than historic levels. As a result, the RFA recommends no change to the recreational (83%) and commercial (17%) ACL until the MRIP bluefish data is subject to public review and comment and the bluefish stock assessment is conducted in the foreseeable future.

Issues 3 & 4 - As set forth in Table 5, it is evident that there has been a climatic shift or movement of bluefish farther north with fewer landings in southerly waters. As a result, the Commonwealth of Massachusetts continues to request commercial quota transfers. Adjustments to quota should be consistent with recent historical landings set forth in Table 5.

Ongoing transfers under the present scheme needs to consider northern and southern stocks with adjustments made accordingly. For instance, obtaining quota from Florida to utilize in Massachusetts appears inappropriate if obtained from the southern stock and should be obtained from a state associated with the northern stock.

Ultimately there have historically been fewer bluefish available to recreational anglers in our waters the past several years. Commercial quota transfers from state to state have an impact on recreational anglers if commercial pressure disrupts or depletes dense schools of bluefish particularly during periods of time when traditionally bluefish are very important to the recreational sector. The increase in commercial harvest may be contributing to this reduction. Ultimately the RFA recommends no change to the present quota transfer scheme at this time until the MRIP data is subject to public review and comment and the bluefish stock assessment is conducted in the foreseeable future.

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

Thanks

*Capt. Mike Pierdinock*  
*RFA - Massachusetts Chairman*  
617-291-8914 (cell)

---

**From:** monica pahuliz <monicapahuliz@hotmail.com>  
**Sent:** Friday, June 15, 2018 10:06 PM  
**To:** Seeley, Matthew  
**Subject:** Blue fish management

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

As it was stated in the prior email that the commercial fisheries has been allocated a percentage each year since 2001 and the recreational fishermen has not had an increase unfortunately the commercial catch is a lot more then the local fishermen there should be some changes made and that not to keep increasing the commercial fisherman

Thankyou

Monica Pahuliz  
Oakhurst, New Jersey

Sent from my iPhone

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#### North Carolina Fisheries Association's Bluefish Allocation Amendment Scoping Comments

Issue 1: FMP Goals and Objectives – After reviewing the goals and objectives outlined in the original Bluefish FMP the North Carolina Fisheries Association has concluded that in our opinion they are still relevant and appropriate for managing the Bluefish fishery.

Issue 2: Commercial and Recreational Allocations – The North Carolina Fisheries Association supports maintaining the current allocation of 83% recreational harvest and 17% commercial harvest as long as the FMP allows unused recreational quota to be transferred to the commercial sector when necessary.

Issue 3: Commercial Allocations to the States – The North Carolina Fisheries Association supports maintaining the current state allocations for Bluefish which were based on the historical significance of the Bluefish fishery to each individual state. We believe that the flexibility of allowing quota to be transferred and the fact that there has always been quota available for transfer when needed makes any discussion of reallocation unnecessary.

Issue 4: Quota Transfers – The North Carolina Fisheries Association strongly supports the current system of Quota transfers which allow quota to be transferred from state to state within the commercial fishery and from the recreational sector to the commercial sector. The ability to transfer quota is an important tool that managers can use to help them provide the highest availability of Bluefish to U.S. fishermen while maintaining traditional uses of Bluefish and to reduce the waste of regulatory discards which are two important goals outlined in the original FMP. While we support the current quota transfer process we could also support changes that would increase the efficiency of that process but have no recommendations of how to achieve this at this time.

---

**From:** owlsnest@enter.net  
**Sent:** Sunday, June 17, 2018 11:07 AM  
**To:** Seeley, Matthew  
**Subject:** Blue Fish Allocation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Keep allocations as is. There should be a major change in the summer fluke size limit for recreational fishing like [2] at 16" and {1}at 18" so you can take some fish home.ALSO MOST OF THE 18" AND ABOVE ARE ALL FEMALES.

---

**From:** Anglerpmh <anglerpmh@aol.com>  
**Sent:** Wednesday, June 27, 2018 5:18 PM  
**To:** codymclaughlin.work@gmail.com; cristori@aol.com  
**Cc:** tothjohn@verizon.net; sradosi@verizon.net; Seeley, Matthew; DHarrison@cdtresources.com; rayszpond@gmail.com; jzaqorski@crossroadsaudiovideo.com; fish5271@gmail.com  
**Subject:** Re: "Bluefish Allocation Amendment Scoping Comments"  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Below is a letter I wrote on behalf of the Forked River Tuna Club. See some of you at the meeting in Toms River tomorrow.

Paul Haertel

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

6/27/18

Director Moore,

I am writing this letter on behalf of the Forked River Tuna Club which is composed of more than 100 members and is based in Forked River, NJ. We appreciate this opportunity to comment on the amendment that is currently being developed by the ASMFC and the MAFMC regarding the Bluefish Fishery Management Plan.

Our primary concern is that this amendment may contain an option that would revise the allocation of bluefish between the commercial and recreational fishermen. More specially we are opposed to any option that would grant the commercial sector a higher percentage of the quota than they have now. The split is currently 87%-13% favoring the recreational sector and we want it to remain that way. Further, we are opposed to the transfers of recreational quota to the commercial sector that have been taking place for the last number of years and we urge you to immediately stop that practice.

The recreational fishermen have been under fishing their bluefish quota for a number of years. That is not a good reason to transfer some of their quota to the commercial sector. We want to rebuild the stock not reduce it. Bluefish are a very important fish for inshore and shore-based fishermen. There used to be massive runs of bluefish of all sizes in the NJ surf during spring and fall. During summer these fish used to settle in areas such as the Mud Hole and Barnegat Ridge and provided sport and food for the many private, charter and party boats that depended on them. Many of those boats have now gone out of business or have been forced to target other species. Striped bass are on the decline and there are virtually no weakfish around. It is quite difficult for shore-based anglers to catch a legal sized blackfish, fluke or sea bass and when they do, the season is often closed! Snappers are often a fun fish for children to catch from the docks and bay shore when they are first learning how to fish. We need this species to be rebuilt.



Further, we are outraged at the fact that the spawning stock biomass is below its target and yet the ASMFC and MAFMC are considering transferring some of the quota to the commercial side to ensure that they are killed. Also, in recent years the recreational harvest has dropped by about 50% compared to what it was during the first decade of the 2000's. We are facing shorter seasons, smaller bag limits and higher size limits for sea bass, a stock that is rebuilt to 230% and the ASMFC and the MAFMC want us to believe that our regulations won't become more stringent if we transfer some of our bluefish quota to the commercial sector? How about reallocating some of their quota for fluke and sea bass to the recreational side?

Sincerely,

In a message dated 6/26/2018 1:10:50 PM Eastern Standard Time, codymclaughlin.work@gmail.com writes:

Gentlemen,

The NJOA also just published a petition - which we'll present the number of if we get enough signups beforehand.

Success page also goes to the comments page and copy is provided in case someone wants to submit commentary:

<https://mailchi.mp/njoutdooralliance/keepbluefishrecreational>

On Tue, Jun 26, 2018 at 1:05 PM, Glnn: <[cristori@aol.com](mailto:cristori@aol.com)> wrote:

Pass it along!

Al

Al Ristori

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

-----Original Message-----

From: John Toth <[tothjohn@verizon.net](mailto:tothjohn@verizon.net)>

To: sradossi <[sradossi@verizon.net](mailto:sradossi@verizon.net)>; mseeley <[mseeley@mafmc.org](mailto:mseeley@mafmc.org)>

Cc: AnglerPMH <[AnglerPMH@aol.com](mailto:AnglerPMH@aol.com)>; DHarrison <[DHarrison@cdtresources.com](mailto:DHarrison@cdtresources.com)>; rayszpond <[rayszpond@gmail.com](mailto:rayszpond@gmail.com)>; [codymclaughlin.work@gmail.com](mailto:codymclaughlin.work@gmail.com); jzagorski <[jzagorski@crossroadsaudiovideo.com](mailto:jzagorski@crossroadsaudiovideo.com)>; cristori <[cristori@aol.com](mailto:cristori@aol.com)>; fish5271 <[fish5271@gmail.com](mailto:fish5271@gmail.com)>

Sent: Tue, Jun 26, 2018 8:49 am

Subject: Re: "Bluefish Allocation Amendment Scoping Comments"

Serge,

Good response!

JT

-----Original Message-----

From: Sergio Radossi <[sradossi@verizon.net](mailto:sradossi@verizon.net)>

To: mseeley <[mseeley@mafmc.org](mailto:mseeley@mafmc.org)>

Cc: John Toth <[tothjohn@verizon.net](mailto:tothjohn@verizon.net)>; Paul Haertel <[AnglerPMH@aol.com](mailto:AnglerPMH@aol.com)>; Dan Harrison <[DHarrison@cdtresources.com](mailto:DHarrison@cdtresources.com)>; rayszpond <[rayszpond@gmail.com](mailto:rayszpond@gmail.com)>; [codymclaughlin.work@gmail.com](mailto:codymclaughlin.work@gmail.com); Joe Zagorski <[jzagorski@crossroadsaudiovideo.com](mailto:jzagorski@crossroadsaudiovideo.com)>; Al Ristori <[cristori@aol.com](mailto:cristori@aol.com)>; Herb, Dick <[fish5271@gmail.com](mailto:fish5271@gmail.com)>

Sent: Tue, Jun 26, 2018 10:46 am  
Subject: "Bluefish Allocation Amendment Scoping Comments"

Dear Dr. Chris Moore, Ph.D., Executive Director,  
It is understood that the Mid-Atlantic Fishery Management Council and the ASMFC are holding scoping hearings to gather information to be considered in the Bluefish Allocation Amendment which is being pushed by commercial interests seeking to slice off a greater percentage of the bluefish allocation for commercial fisheries.

Given that the sustainability of our recreational fisheries are already being stressed by reduced availability of Summer Flounder, Black Sea Bass, Winter Flounder, Weakfish, Striped Bass, Mako Shark, Tuna, Cod, Tautog, etc....., **the loss of bluefish access to the recreational community is unacceptable.**

Quoting Mr. Al Ristori from his blog, Tight Lines, *"This wouldn't be acceptable under any circumstances, but is particularly dangerous at this time when bluefish abundance seems to be declining.*

*Recreational fishermen are being punished for releasing such a large percentage of their bluefish catch, which makes it appear that they're not interested in that fishery. In actuality. we've generally had a hard time seeking blues in recent years"*

I respectfully request that the MAFMC and ASMFC leave the bluefish allocation and quotas as is. Please do not further punish the recreational community. Further, I respectfully request that the MAFMC's and ASMFC's limit resources be focused on existing unresolved issues. Let's fix the problems we have first. Let's have some successes, before looking for other problems.

Thank You  
Sergio Radossi  
Recreational Angler and Recreational Representative for the New Jersey  
Marine Fisheries Council

**From:** Peter Nacci <naccipeter@gmail.com>  
**Sent:** Wednesday, July 11, 2018 8:02 AM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Amendment Scoping Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr Seeley,

I am writing in opposition to planned actions intended to shift bluefish quotas from recreational to commercial fishermen. I think that would be a very bad idea. I have fished recreationally for blue fish in the Chesapeake Bay (off the coast of Maryland) and Long Island Sound (off the coast of Connecticut) for over 50 years. In both locations there has been a huge decline in the size and number of bluefish taken. Merely shifting quotas from one group to another does nothing constructive, and would only invite over harvesting and collateral damage by commercial fishermen. A better strategy in my view would be a short term moratorium on all bluefish and on the fish they prey on, alewives, bunkers, menhaden etc. The moratorium on rockfish decades ago was very impactful and the fishery rebounded dramatically. Bluefish deserve the same kind of consideration as rockfish. Please do not support the proposed plan and work to modify a plan in a more "pro growth" direction.

Thank You,

Dr. Peter Nacci

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July 30, 2018



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

Fax: 302 674-5399

**RE: Comments on Scoping and Public Information Document to the Bluefish Fishery Management Plan**

Dear Dr. Chris Moore:

Please accept the following comments on behalf of the Recreational Fishing Alliance (RFA) with regards to the scoping and public information document for the bluefish allocation amendment. These written comments reaffirm comments provided by our organization on at the June 27<sup>th</sup> and July 11<sup>th</sup> public hearings in New Jersey and Massachusetts respectively.

Our comments are as follows;

RFA asks to completely strike Issue 2: Commercial and Recreational Allocations, from the scoping document and maintain the current allocations citing the following reasons. First, bluefish is still extraordinarily important to the recreational fishing community especially in the current regulatory climate that truncates recreational fishing seasons. In particular, the spring run of bluefish provides much needed fishing activity for party boats, for-hire boats, tackle shops and private anglers and generates some of the first real economic activity for our industry after a long winter and when other important species are closed. This importance is not always reflective in recreational landings. Second, quota transfers from the recreational sector to the commercial sector have occurred for the past 10+ years. Even with these transfers, the commercial sector has not fully utilized their given quota as reflected on table 3 of the scoping document. The commercial sector does not appear to need adjustments to the current allocation scheme unless they intend to expand their market which we do not support. Furthermore, neither ASFMC nor MAFMC has demonstrated that there is a significant administrative burden or problem with the current approach that makes these transfers on an annual basis. Therefore, RFA does not see any reason why the current approach needs to be changed. Finally, the pending revisions to the recreational catch and landings estimate produced through MRIP cast considerable doubt on the numbers contained in the scoping document and stand to have significant management implications. If recreational landings are revised upwards by 300 to 500% as suggested by NMFS personnel, the recreational sector will not have extra quota to give to the commercial sector. RFA believes now is absolutely worst time to even discuss permanent allocation changes that would take fish away from recreational anglers.

RECREATIONAL FISHING ALLIANCE  
PO Box 3080 New Gretna, NJ 08224  
Tel: 888 564-6732 Fax: (609) 294-3812  
[www.JOINRFA.org](http://www.JOINRFA.org)

2). RFA asked that the scope document include language that discusses the pending revisions to MRIP estimates. While this issue is mentioned on page 10 of the document however, it does not go into enough detail about the magnitude of the revisions. RFA finds this misleading because the scoping document indicates that the recreational sector has habitually failed to utilize its full ACL thus resulting in the annual 5 million pound quota transfer to the commercial sector. Yet, if the preliminary revisions to MRIP bear true, then in fact the recreational sector has been fully utilizing its ACL. RFA suggests including a table that includes the recreational annual catch limit on an annual basis, the recreational landings as predicted by MRIP and the pending revisions to the recreational landings.

Sincerely,



Jim Donofrio  
Executive Director



**RHODE ISLAND**  
**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**DIVISION OF MARINE FISHERIES**  
3 Fort Wetherill Road  
Jamestown, Rhode Island 02835

**TO:** Dr. Chris Moore, Executive Director of the Mid-Atlantic Fishery Management Council

**FROM:** Dr. Jason McNamee, Chief of Marine Resources

**DATE:** July 27, 2018

**SUBJECT:** Bluefish Amendment Scoping Comments

Staff at the Rhode Island Department of Environmental Management (RIDEM) Division of Marine Fisheries (DMF) have heard from local fishermen regarding the scoping for the bluefish allocation amendment that they would like the state-by-state allocations to be revised. RI has received transfers the last 4 years (2014-2017) ranging from 100,000 lbs. to 180,000 lbs. RI averaged a +55,949-lb. transfer over the past 13 years. This is therefore an issue that the state of RI would like to recommend as a priority for inclusion in the amendment. We recommend looking to the summer flounder comprehensive amendment for possible examples of how the state allocations could be revised. A few potential options include, but are not limited to:

- A. Revising the state-by-state allocations, adjusting by regional relative exploitable biomass using NEFSC, NEAMAP, and/or SEAMAP trawl survey data
- B. Use of a formula that combines the use of more recent landings data and an exploitable biomass approach such as that described in option A above
- C. State allocations revised above a commercial-quota trigger point (i.e., quota above a specific trigger point may be allocated differently)



**RHODE ISLAND**  
**SALTWATER**  
**ANGLERS**  
**Association**



P.O. Box 1465, Coventry, Rhode Island 02816

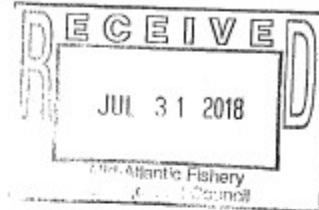
401-826-2121

FAX: 401-826-3546

www.RISAA.org

July 25, 2018

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



RE: Bluefish Allocation Amendment Scoping Comments

Dear Mr. Moore:

Please accept this letter as public comment pertaining to the scoping document for the Bluefish Allocation Amendment to the Bluefish Management Plan.

I write to you today as the President and Executive Director of the Rhode Island Saltwater Anglers Association (RISAA) which represents over 7,500 recreational anglers and 29 affiliated clubs and organizations in Southern New England.

We support your efforts to solicit amendment scoping comments on bluefish as they are very important to recreational anglers. Growing the bluefish stock to abundance, so there are many of them in the water to fish and catch, is extremely important to recreational fishers.

As a saltwater angler organization we encourage catch and release for bluefish, in particular so that the fish are there the next time we go fishing. It is therefore not acceptable to our members that after they practice conservation, those released fish are then allocated to commercial fishermen to harvest, extracting them from the ocean and eliminating the possibility for our members to catch them in the future.

We oppose transferring quota from the recreational sector to the commercial sector to kill more of these fish. We need to encourage conservation and grow this fishery as we have experienced a decrease in abundance over the past several years in our region.

Here are our comments on key issues.

**Issue 1: FMP goals and objectives... consider adding**

We should manage this fishery, in part, as a catch and release fishery accounting for the released fish, not just on extraction rates.

Need fish in the water to grow this fishery

Need to consider the movement of this biomass due to climate change and warming water, northern states are overfishing commercial quota. Is this due to a shift in the stock to the north?

**Issue 2: Commercial and recreational allocations**

The present 83% recreational and 17% commercial split is appropriate. Recreational fishing relies on this species for

economics and its intrinsic value. There should be no transfers from recreational to commercial fisheries as this is a catch & release fishery and we encourage conservation, not discourage it with sector transfers. We need to leave fish in the water to grow them to abundance as we have experienced a decline of bluefish in our region and this has greatly impacted our recreational bluefish fishery.

**Issue 3: Commercial allocation to the States**

Suggest the amendment take into consideration a shift in stock biomass due to climate change and other factors and to adjust commercial allocations to the states accordingly.

**Issue 4: quota transfers**

Need to stop recreational to commercial sector transfers. This is a bad practice that discourages conservation in this catch & release fishery.

**Issue 5: Other issues**

Bluefish have an economic and intrinsic value to the recreational fishery. The value of unharvested fish has to be a major factor considered. We need to grow this fishery to abundance so recreational anglers can catch and release more of them.

We are happy to provide further clarification of our position on the proposed bluefish amendment.  
Thank you for the consideration and opportunity to comment.

Sincerely,



Stephen J. Medeiros  
Executive Director  
Rhode Island Saltwater Anglers Association

**From:** veres02@aol.com  
**Sent:** Wednesday, July 25, 2018 10:48 AM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Allocation Amendment Scoping Comments

Re; Commercial vessel Gypsea Permit SF 1136 Hook/Line Fluke Federal permit # 150675

I would like to address the length of the current hook/line season for the commercial harvest of bluefish. Since inception, the season runs from June 16 to August 7 in a calendar year, basically 7 and a half weeks. Why is it so short and why does it occur when the majority of the migration is already well past us and heading north? I fish in the northern area of the state in Sandy Hook and Raritan Bay. Basically, the season just about excludes the N.J. hook/line commercial fishermen. All other methods for the commercial harvest of bluefish have no closed seasons(except possibly purse seine when quota is met). This is prejudiced against hook/line fishermen who have the least impact of all other fisheries especially when you take by-catch into account. Since I mostly fish for fluke, it may be illegal if I even retain a single bluefish during the closed hook/line commercial season while commercially fishing for fluke, for example, on May 25. What an injustice!!!!  
I sincerely hope that this prejudice and injustice finally gets rectified and that the hook/line fishermen have the same privileges as other commercial fishermen using different harvest methods and obtain a yearly season or at the very least a season that will run from April 1 to December 31.

Respectfully submitted,

Robert A. Veres

**From:** Ron Hoff <bronh22@yahoo.com>  
**Sent:** Wednesday, July 25, 2018 9:33 AM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Allocation Amendment Scoping Comment

Gentleman, I am a recreational fisherman, and have been fishing for most of my life, i am 76 years old. I have witness a decline in the Bluefish over the last 3 years. We have bluefish starting around may 1 every year. Once we get to June the amount of Bluefish caught has declined tremendously. I have see this trend and it's very disappointing. What Passing the Bluefish Allocation Amendment means to local businesses.

**I think it's possible that this action, if approved, could trigger undue**

**hardship down the road for tackle shops, guides and the waterfront**

**communities that support sport fishing.**

**Why can't you manage for abundance & not destroy the Bluefish stock.**

**I believe Bluefish are already on the decline.**

**Please Vote NO.**

**Ronald Hoff**

**806 E. Chester St**

**Long Beach, NY 11561**

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**From:** Sergio Radossi <sradossi@verizon.net>  
**Sent:** Tuesday, June 26, 2018 10:47 AM  
**To:** Seeley, Matthew  
**Cc:** John Toth; Paul Haertel; Dan Harrison; rayszpond@gmail.com; codymclaughlin.work@gmail.com; Joe Zagorski; Al Ristori; Herb, Dick  
**Subject:** "Bluefish Allocation Amendment Scoping Comments"  
**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Dr. Chris Moore, Ph.D., Executive Director,

It is understood that the Mid-Atlantic Fishery Management Council and the ASMFC are holding scoping hearings to gather information to be considered in the Bluefish Allocation Amendment which is being pushed by commercial interests seeking to slice off a greater percentage of the bluefish allocation for commercial fisheries.

Given that the sustainability of our recreational fisheries are already being stressed by reduced availability of Summer Flounder, Black Sea Bass, Winter Flounder, Weakfish, Striped Bass, Mako Shark, Tuna, Cod, Tautog, etc...., **the loss of bluefish access to the recreational community is unacceptable.**

Quoting Mr. Al Ristori from his blog, Tight Lines, *"This wouldn't be acceptable under any circumstances, but is particularly dangerous at this time when bluefish abundance seems to be declining.*

*Recreational fishermen are being punished for releasing such a large percentage of their bluefish catch, which makes it appear that they're not interested in that fishery. In actuality, we've generally had a hard time seeking blues in recent years"*

I respectfully request that the MAFMC and ASMFC leave the bluefish allocation and quotas as is. Please do not further punish the recreational community.

Further, I respectfully request that the MAFMC's and ASMFC's limit resources be focused on existing unresolved issues. Let's fix the problems we have first. Let's have some successes, before looking for other problems.

1

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Thank You

Sergio Radossi

Recreational Angler and Recreational Representative for the New Jersey Marine Fisheries Council

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## SOUTHEASTERN FISHERIES ASSOCIATION




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 East Coast Fisheries Section
 

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30 July 2018

Bluefish Allocation Amendment to Management Plan  
 Scoping and Public Information Document  
 Mid-Atlantic Fishery Management Council (MAFMC)  
 Atlantic States Marine Fisheries Commission (ASMFC)

Re: Bluefish Allocation Amendment Scoping Comments

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

Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) has members who depend on Bluefish catch and sales from Florida state and federal waters to non-boating consumers, and some recreationally land Bluefish on for-hire trips and/or privately. With that comment, we are currently in support of the "Status Quo" for allocation percentages with the transfer of quota that has existed since 1999, and 2019 fishing allocations are a positive choice.

The SFA ECFS position of status quo is defensive since this Bluefish scoping effort by the MAFMC and ASMFC began before the Marine Recreational Information Program (MRIP) calibration results had become public earlier this July. The Bluefish MRIP calibration changes are not included in the Bluefish scoping document alternatives. Until the 2019 "Operational Assessment" utilizes the estimated MRIP catch increases for the period 1981 to 2017, there are a great deal of unknowns currently with what could be a larger spawning stock biomass, stability, recruitment, dead discards, and how to handle MRIP years that have 100% to 400% increases of "estimated catch" for many years. The SFA ECFS asserts that a "Full Benchmark Assessment" should take place instead of depending on an operational assessment changes only MRIP data compared to past estimated totals by the National Marine Fisheries Service's science.

Some of the best ex-vessel prices for all sizes of Bluefish during the past few years are occurring as the non-boating consumer desire fresh domestic fish. Florida has had 10% of the commercial allocation on the US East Coast. North Carolina commercial fishing entities have also requested status quo and tend to land the largest amount of Bluefish on the US East Coast. Both Florida and North Carolina support the continued transfer of underutilized recreational catch to the commercial sector as needed. Data shows from the past that the recreational sector only exceeded their allocation during 2007, while not catching the estimated allocation in most years.

Recreational analyses are two to one for releases versus landings of Bluefish and have a 15% dead discard rate that needs to be reexamined in a Full Benchmark Assessment. SAW SARC 60

111 WEST GRANADA BLVD., ORMOND BEACH, FLORIDA 32174-6303  
 SFAECFS@gmail.com

completed the recent benchmark during 2015 with data through 2014. The results indicate that the Bluefish biomass is not overfished, and overfishing is not occurring. This as a positive result should justify a status quo until a Full Benchmark Assessment is completed.

The MAFMC 2019 Bluefish Recommendations pasted below are supported by the SFA ECFS membership for the US East Coast. Slide below is from the 24 July 2018 Bluefish Monitoring Committee Meeting Webinar Presentation.

Management Measure	2018 (Current Measures set in 2015, see FR)		Basis	2019 Recommendations	
	Million lbs	mt		Million lbs	mt
ABC	21.81	9,895	Derived by SSC; Council P* policy	21.81	9,895
ACL	21.81	9,895	Defined in FMP as equal to ABC	21.81	9,895
Management Uncertainty	0	0	Derived by Monitoring Committee	0	0
Commercial ACT	3.71	1,682	(ACL – Management Uncertainty) x 17%	3.71	1,682
Recreational ACT	18.11	8,213	(ACL – Management Uncertainty) x 83%	18.11	8,213
Commercial Discards	0	0	Value used in assessment	0	0
Recreational Discards	2.99	1,356	2015 discards	2.99	1,356
Commercial TAL (pre-transfer)	3.71	1,682	Commercial ACT – commercial discards	3.71	1,682
Recreational TAL (pre-transfer)	15.12	6,857	Recreational ACT – recreational discards	15.12	6,857
TAL Combined	18.83	8,539	Commercial TAL + recreational TAL	18.83	8,539
Expected Rec Landings	11.58	5,253	2015 recreational landings	11.58	5,253
Commercial quota	7.24	3,286	Commercial TAL + transfer	7.24	3,286
Recreational harvest limit	11.58	5,253	Recreational TAL - transfer	11.58	5,253

Jimmy Hull, Chairman  
SFA ECFS  
111 West Granada Blvd.  
Ormond Beach, FL 32174-6303

**From:** Sousaville Channel <sousaville@cox.net>  
**Sent:** Thursday, July 26, 2018 1:32 PM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Amendment

I believe we need to impose strong conservation efforts to protect the blue fish. At this point they appear to be do fair. But giving the commercial Fishery a higher quota doesn't make sense to me and this is how bad things start.

NY

Steve Cannizzo

**The Inconvenient Truth on Bluefish which the 'keep em  
in the water bunch' never can explain**

One does wonder with all the regulatory battles within the MAFMC and NEFMC management region over the past few years that one of the biggest for 2018 just happens to be over bluefish.

Few fishermen in the New York and New Jersey fishing nexus once noted for having the largest directed recreational fishing, knew that there would be a number of scoping hearings with roughly a dozen spread amongst the states, and then ending in July with a webinar at the end of the scoping process.

Well that was until two of the "usual suspects" started spreading a number of fallacies which have no grounding in fact, and is defied by the latest actual data that has been supplied within the documents for the MAFMC – A.P. Bluefish meeting in Maryland this week. This online campaign actually back-fired since it drew the attention of some within the commercial and for-hire industry

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which would be impacted by the changes that the “usual suspects” are advocating for.

The most notable issue and the primary issue of contention in the development of the new Bluefish Allocation Amendment is with the recreational to commercial rollover where the unused recreational quota is transferred to those states where commercial quota is needed. Due to past historical landings between the two sectors, the ACL (annual catch limit) has the recreational sector receiving 83% of the quota with much of it going unused (harvested) during the calendar year as recreational fishery behavior and the latest effort data clearly indicates that fewer anglers are targeting and harvesting bluefish along the coast. In fact, and as noted within the scoping document on page 12, based upon the most recent MRIP estimates over the past five years (from 2013 through 2017), the trend in harvest has gone down each and every year (more on this later and why recreational harvest has gone down).

In returning to the rollover of bluefish from the recreational to commercial sector, over a number of

Page 3 of 9

years these state to state transfers amongst the 14 states have gone smoothly and which have been written into the specifications which is noted, "State quota allocations have generally kept the proportion of total landings stable over time."

These days, the word "stability" in single-stock fishery management is not to commonly seen within fishery documents, but here with the recreational to commercial bluefish rollover the trend has been for states from Florida northward along with the state of New Jersey, do not catch their recreational quota, and what essentially is a shifting from one column to the other - 'on paper transfer' is made to the commercial sector to the traditionally high bluefish landing-states of New York, Rhode Island and Massachusetts. Without this rollover, the commercial sector (in the states that request and now require extra quota), would result in wasteful regulatory discards, as well as prematurely create in-season closures in the bluefish fishery in order to prevent over harvest in that sector.

To quickly sum up:

Page 4 of 9

- Unused recreational quota is redistributed to the commercial sector and has been done over the decades and as noted: “Transfers from the recreational to commercial sector have occurred in every year since 2001” without any serious issues arising from this program
- Quota is accounted for and there to be used where necessary
- There is no scientifically verified data that the recreational to commercial rollover lessens recreational angling behavior or impacts the stock itself

There is also one other factual nugget that the “usual suspects” fail to point out, and it is within the summary from the last bluefish Benchmark:

“Results from the most recent benchmark stock assessment indicate that the bluefish stock is not overfished and overfishing was not occurring in 2014

Page 5 of 9

relative to the biological reference points (BRPs) from the 2015 SAW/SARC 60.”

The other salient issue which the “usual suspects” manufactured to whip up their minions was on advocating for a reduction from the current 15 fish possession down to 5 fish - or what is essentially a 2/3rds ‘bag limit’ cut. The propaganda used here relied upon tales told from decades ago on wasteful fishery practices, with the most notable being in the discarding of large amounts of either bluefish or snappers after a day’s fishing along the docks, marinas or highways. The kicker in these few stories circled back on the well-worn line about “fishermen do not need to take that many ‘X’ or in this case with the current possession limit of 15 bluefish home.”

One only has to look back to the golden era of party boat blue fishing during the period from the 1970’s to the late 1980’s when aluminum supercruisers were commonly carrying 40, 50, 60 and more fishermen, both day and night for roughly six months of the season and with unlimited possession limits. Does anyone remember



Page 6 of 9

down seasons or the bluefish 'cycling out' during this period? Of course, lulls in the fishing did occur with the fish showing up later than expected on the calendar, but there was a very consistent – uninterrupted year by year unlimited harvest from one season to the next with no one ever indicating that the amount of bluefish available to anglers was contracting..

The current recreational bluefish fishery as far as being measured in 'participants,' has extremely contracted since the recreational peak of the fishery, especially when compared to a quarter century ago in the 1990's, with noticeably less angler participation in 'targeted bluefish fishing' especially during the period of 2000 to 2010. Much of this was due to the resurgence and popularity of striped bass in the Mid-Atlantic as well as other gamefish species being available in southern-region waters for all three recreational fishing modes (party/charter, private vessel and shorebound).

What is more notable for the recreational sector is that the greatest cause for not harvesting bluefish nearshore or within the local bays and harbors has been due to

Page 7 of 9

nature and the eco-system itself, and is well documented with the lack of various white/stick bait, higher than normal seasonal water temperatures as well as the more or what we all can say is most serious issues with water quality deteriorating along our shoreline. Nonetheless there has been a distinct pattern for migrating bluefish to travel further offshore, lessening access from the traditional fishing ports along this coast, and so far this season this trend of massive schools of bluefish coming through and passing our local canyons continues.

What the “two usual suspects” have done here with the bluefish scoping hearings is to create exaggerated hyperbole to first draw attention, then to use baseless rhetoric as far as the latest scientific data indicates. It is nothing more than their continued stirring of the pot to create further division amongst user groups, with one of the most fictitious points on this being a ‘zero-sum’ strategy being used by the commercial fishing industry and party boats of taking away “their fish” .... and I put that statement within quotes because this is the messaging that they are using on this issue.

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Just remember going into this evenings meeting at the NYS DEC Bunker, that here is another of the “much ado about nothing” fishery issues which everyone who either reads the documents or regularly targets bluefish can clearly and honestly state about bluefish.

**Steven Cannizzo**

**NY RFHFA**

**June 26, 2018**

[mb1143f@gmail.com](mailto:mb1143f@gmail.com)

917-687-3793

Captain Joe Tangel

fv KING COD

President – NY RFHFA



**NEW YORK RECREATIONAL &  
FOR-HIRE FISHING ALLIANCE**

**"LET US FISH"**

**From:** Tom Lynch <tgl9000@yahoo.com>  
**Sent:** Friday, July 27, 2018 6:40 PM  
**To:** Seeley, Matthew  
**Subject:** Bluefish Amendment Scoping Comments

I oppose transferring bluefish quota from the recreational sector to the commercial sector. This proposal will be heavily destructive to the bluefish stocks.

**Tom Lynch**  
owner/photographer  
Angry Fish Gallery LLC  
(t) 848.241.2744  
[www.AngryFishGallery.com](http://www.AngryFishGallery.com)

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**From:** Bill <doanbill@aol.com>  
**Sent:** Thursday, June 28, 2018 7:24 AM  
**To:** Seeley, Matthew  
**Subject:** bluefishmanagement changes

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To The Marine Fisheries Management Council:

The management objective for the bluefish fishery should be to increase the population to maintain a high quality sport fishery where it is likely to catch large numbers of bluefish on any given fishing trip. Bluefish should be managed to increase their abundance. Bluefish harvest needs to be reduced. Bluefish should be regarded as primarily a catch and release sport fish.

The allocation between commercial and recreational harvest probably does not need to be changed. A modest reduction in the commercial sector allocation might be the only thing that should be changed. However, there should be a significant reduction in both recreational and commercial harvest of bluefish. Bluefish are not as abundant as they once were. They, like almost everything else, have been overfished. No recreational angler in NJ really needs to keep 15 bluefish per trip. The bag limit should be reduced to 5. Bluefish are too easily overfished. Too many anglers keep more than they really can really consume.

There has been a change in fishing productivity. Bluefish are less common than in the recent past and there are fewer larger fish. The continued loss and degradation of salt marshes along the East Coast, the decline in the range and population size of menhaden and mackerel, and constant disturbance of the ocean bottom (inshore bottom structure that attracts fish) from beach replenishment have contributed to the decline in the size and distribution of the bluefish population. The probability of catching bluefish on any given fishing trip or catching larger bluefish has decreased tremendously. Bluefish used to be common and easy to find and catch. That is no longer true in NJ waters and federal waters.

Both recreational and commercial harvest of bluefish should be sharply reduced in all Atlantic Coast states. Bluefish should primarily be managed as a gamefish.

Sincerely,

William Doan

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