

December 9 2016,

Mr. Mike Luisi, Chairman  
Mid Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE 19901

Dear Chairman Luisi and Members of the Council:

We would like to take this opportunity to voice our collective concerns pertaining to the proposed reduction in the Summer Flounder quota. The lack of recruitment in the NEFSC Spring/Fall surveys is one of the key drivers in the last status update, which in turn is driving the need for reducing the TAC for Summer Flounder. Since the time of the last SSC review, the data from the NEFSC Sweep Efficiency Study has been analyzed and reviewed. The focus of the study was to determine the efficiency of the rockhopper sweep used by the R/V Henry B. Bigelow on the 400 X 12 survey trawl vs a 400 x 12 survey trawl fitted with a chain sweep. The study determined that the estimates of efficiency for the rockhopper has been (since 2008) significantly over estimated. (As much as 400% for some species) The study also proved that the current survey trawl configuration is ineffective for sampling flatfish recruitment as juveniles were present in the chain sweep trawl and absent in the rockhopper trawl.

The Witch Flounder SARC has recently accepted this trawl study data during the last assessment, changing the status of the stock from "Overfished" to "Unknown" based on the new data.

We ask that the Council task the SSC with reviewing the summer flounder specifications with the new trawl data which is now available. The quota reduction will take effect January 1 2017, but if evaluating the new trawl data supports a smaller reduction or status quo, the balance can be added anytime within the year, as every state has the ability for an in season adjustment.

Thank you for your attention to and consideration of our request.

With best regards,

Virginia Seafood Association

Garden State Seafood Association

North Carolina Fisheries Association