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March 17, 2021

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

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

Dear Dr. Moore:

I recommend catch based allocations as follows:

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

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

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

Quota Transfer Cap Alternatives

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

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

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

Very truly yours,

Capt. John Richardson

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