



## Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | P. Weston Townsend, Vice Chairman  
Christopher M. Moore, Ph.D., Executive Director

August 15, 2022

Mr. Michael Pentony  
Regional Administrator  
Greater Atlantic Regional Fisheries Office  
National Marine Fisheries Service  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mike:

Thank you for the opportunity to comment on the draft Action Plan to Reduce Atlantic Sturgeon Bycatch in Federal Large Mesh Gillnet fisheries. The plan recommends that the New England and Mid-Atlantic Fishery Management Councils (NEFMC and Council), in coordination with the National Marine Fisheries Service and the Atlantic States Marine Fisheries Commission, consider a range of potential measures to reduce Atlantic sturgeon bycatch in federal, large-mesh gillnet fisheries.

Based on the discussion at our recent meeting, the Mid-Atlantic Council shares the questions and supports the concerns identified by the NEFMC in their letter dated August 12, 2022. Several of these areas of concern have been raised by our Council in NRCC meetings and between members of our individual staff. These issues include consideration of the impacts of measures identified under phase 2 of the Atlantic Large Whale Take Reduction Plan on the gillnet fishery and the implication of the recent court decision which declared the 2021 Biological Opinion invalid. We believe that addressing these concerns as well as the other issues listed in the NEFMC letter will improve the ability of the Councils to respond in a more timely and effective manner once the final Action Plan recommendations are released.

Thank you for your consideration of these comments. Please contact me or Karson Cisneros of my staff if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Moore".

Dr. Christopher M. Moore  
Executive Director, Mid-Atlantic Fishery Management Council

CC: M. Luisi, W. Townsend, T. Nies, K. Cisneros