Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201, Dover, DE 19901
Phone: 302-674-2331 | FAX: 302-674-5399 | www.mafmc.org
Michael P. Luisi, Chairman | P. Weston Townsend, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

MEMORANDUM

Date: May 19, 2021

To: Council and Board

From: Matthew Seeley, Council staff

Subject: Bluefish Allocation and Rebuilding Amendment: Cover Memo for Final Action

The Council and Board are developing an amendment to the Bluefish Fishery Management Plan to address several issues in the bluefish fishery. The Council and Board approved a public hearing document at the February 2021 joint meeting. Public hearings were then held in March and April 2021 to recruit public feedback on the final range of alternatives. This public input was reviewed by the Bluefish Advisory Panel (AP) and Fishery Management Action Team (FMAT). Now, the Council and Board will take final action on the Bluefish Allocation and Rebuilding Amendment on Tuesday, June 8th at 10:00 a.m.

The following briefing materials are enclosed behind this tab:

1) Bluefish Amendment Final Action Staff Memo – May 19, 2021
2) FMAT Summary – May 12, 2021
3) Bluefish Amendment Public Comment Summary Document – May 2021
4) Bluefish Public Hearing Document – Revised in May 2021
5) Advisory Panel Meeting Summary – April 27, 2021
6) Bluefish Amendment Alternatives Reference Guide – February 2021

In addition, the ASMFC's Bluefish Allocation and Rebuilding Draft Amendment Document, which was also revised in May 2021, is available on the Council's meeting page.

As noted above, the Bluefish Public Hearing Document was revised in May 2021. A minor error was discovered in the commercial allocations to the states alternative set within the Public Hearing Document (Table 6) and the Bluefish Allocation and Rebuilding Draft Amendment Document. This error was in the status quo allocation column of both tables and included values for some states that were off by a few hundredths of a percent. Given many of the alternatives in the commercial allocations to the states section are linked, this error affected other tables and text within the section. However, all revisions have been made and are highlighted in yellow in the documents. Economic analyses were rerun and all conclusions from the impacts remain the same.

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MEMORANDUM

Date: May 19, 2021

To: Dr. Chris Moore, Executive Director

From: Matthew Seeley, Staff

Subject: Bluefish Allocation and Rebuilding Amendment: Staff memo for final action

On Tuesday, June 8th, the Council and Board will review public comments, input from advisors and the Fishery Management Action Team (FMAT) before considering final action on the Bluefish Allocation and Rebuilding Amendment. This memo outlines Council staff recommendations for each alternative set being considered in the amendment (except *de minimis* – Board only action) with respect to the public comments and input provided by the advisors and FMAT.

FMP Goals and Objectives

Council staff fully support the FMAT recommendations on the FMP Goals and Objectives, which include implementing minor revisions to the language that were suggested during the public comment process. The revisions below (in red), reflect the comments that the FMAT and Council staff recommends be considered by the Council and Board when taking final action. Specifically, the recommendation to change "discard" to "release" encompasses the catch-and-release aspect of the fishery while avoiding the negative connotation that accompanies the term "discard". This potential change carries the same message as using the term "discard" but better suits the desires of the recreational community. The recommendation to change "along the coast" to "within the management unit" allows for the inclusion of inland bluefish consumers that do not live on the coast.

Goal 1: Conserve the bluefish resource through stakeholder engagement to maintain sustainable recreational fishing and commercial harvest.

Objective 1.1: Achieve and maintain a sustainable spawning stock biomass and rate of fishing mortality.
Objective 1.2: Promote practices that reduce ~~**discard**~~ release mortality within the recreational and commercial fishery.
Objective 1.3: Maintain effective coordination between the National Marine Fisheries Service, Council, Commission, and member states by promoting compliance and to support the development and implementation of management measures.
Objective 1.4: Promote compliance and effective enforcement of regulations.
Objective 1.5: Promote science, monitoring, and data collection that support and enhance effective ecosystem-based management of the bluefish resource.

Goal 2: Provide fair and equitable access to the fishery across all user groups throughout the management unit.

Objective 2.1: Ensure the implementation of management measures provides fair and equitable access to the resource across to all user groups ~~**along the coast**~~ within the management unit.

Objective 2.2: Consider the economic and social needs and priorities of all groups that access the bluefish resource in the development of new management measures.

Objective 2.3: Maintain effective coordination with stakeholder groups to ensure optimization of economic and social benefits.

Commercial/Recreational Sector Allocations

The public continues to discuss the cyclical and environmentally driven aspect of the bluefish stock. Given the stock's fluctuations in abundance and availability, Council staff agrees with the FMAT conclusions that alternatives associated with a shorter time series may not be as appropriate for determining allocation between the two sectors. Ideally, capturing the fluctuations in abundance over time will best represent the trends in the bluefish fishery.

Given the FMP stipulates that the allocation percentage be applied to the Acceptable Biological Catch to determine each sector's Annual Catch Target, Council staff recommends using catch data to inform the allocations. Council staff agrees with the FMAT that using catch data as the basis for the allocations of catch will more effectively encompass the needs of a large subset of the recreational sector that receive economic and social benefits from catching and releasing fish, as opposed to harvesting fish.

As noted by the assessment scientist on the FMAT, the status quo alternative does not represent the reality of the fishery anymore. The status quo alternative was based on uncalibrated MRIP estimates from 1981-1989. These estimates are no longer being used in the stock assessments or in catch accounting and should not be considered as the Council and Board discuss reallocation.

As noted by the economist on the FMAT, alternative 2a-4 offers the highest economic benefit to the commercial sector followed by 2a-3 and 2a-2, amongst the allocations based on catch data.

Council staff recommends alternative 2a-3 (87% recreational, 13% commercial) given: 1) the vast majority of public comments supported this alternative, 2) it offers the second highest economic benefit to the commercial sector, 3) is based on catch data, and 4) the time series encompasses the most recent 20 years of fishery performance, which considers more of the cyclical nature present in this fishery over time, as compared to a shorter time series.

For the phase-in alternatives (alternative set 2b), the FMAT and Council staff recommends alternative 2b-1 (no phase-in). This recommendation is consistent with the overwhelming majority of public comments which identified that the phase-in approach does not offer much benefit when the allocations are changing by such a small amount. Additionally, the phase-in approach would add an unnecessary level of complexity and administrative burden.

Commercial Allocations to the States

As described in the sector allocations section, the bluefish fishery often experiences cyclical and environmentally driven levels in abundance. The status quo alternative (3a-1) represents fishery abundance and allocations from 1981-1989, which no longer reflect the current nature of the bluefish fishery. Over time, the bluefish fishery is available in certain regions due to the migratory habits and preferences for offshore waters. Moreover, this change in availability is more well represented over a longer time series, so Council staff does not recommend alternative 3a-2. By design, alternative 3a-4 captures a wide range of years including the historical aspect of the overall time series. However, since half the time series is weighted towards historical abundance, the allocations do not fully represent the current needs of all states and may still warrant state-to-state transfers immediately following reallocation. Finally, public comments were fairly evenly split, however most support was provided for alternative 3a-2, followed by 3a-3, 3a-1, and 3a-4. ***Given the justification provided above, Council staff recommends alternative 3a-3 and notes that while reallocation should reduce the need for state-to-state transfers in years immediately following amendment implementation, transfers may still occur as needed.***

In regard to the option to phase-in, Council staff and the FMAT indicated that the selection of a more recent time series to inform reallocation will more accurately reflect current state-specific needs and may reduce the need to phase-in any changes. Similar to the recommendation for the sector allocations, Council staff and the FMAT noted that the phase-in alternative set was also unpopular (often at public hearings) despite receiving some support from the public. Phasing-in allocations has added levels of complexity and administrative burden, especially given the changes associated with implementation of a rebuilding plan and updated stock assessments. Overall, Council staff believes the perceived benefits of phasing-in potentially small allocation changes for most states does not outweigh the complexity and administrative burden. ***Therefore, Council staff recommends alternative 3b-1, no phase-in.***

After reviewing all public comments related to the trigger alternative set (3c), the FMAT and Council staff recommends alternative 3c-1, no trigger. Council staff and the FMAT noted that the public found the trigger approach to be overly complicated with limited perceived benefit.

Considering the commercial allocations to the states section included 4 sub-alternatives, Council staff and the FMAT believes the complexity tied to sub-alternative sets 3b and 3c may have influenced the public's widespread support on minimum default allocation alternatives. ***Ultimately, the FMAT and Council staff recommend implementation of a 0.10% minimum default allocation (3d-2).*** This alternative will allow states that would otherwise lose their allocation through the reallocation process to retain a minimum default allocation, which will allow small amounts of bluefish caught in these states to be harvested instead of discarded. Council staff agrees with the FMAT that 0.10% strikes a balance between reducing regulatory discards and not overburdening other states' allocations.

Rebuilding Plan

As indicated in the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the preferred rebuilding plan shall be as short as possible, taking into account the status and biology of any overfished stocks of fish, the needs of fishing communities, recommendations by

international organizations in which the United States participates, and the interaction of the overfished stock of fish within the marine ecosystem; and not exceed 10 years, except in cases where the biology of the stock of fish, other environmental conditions, or management measures under an international agreement in which the United States participates dictate otherwise.

Council staff agrees with the FMAT that the rebuilding plan should be as short as possible while considering the needs of the fishing communities that depend on the resource. Additionally, the rebuilding plan should account for the inherent uncertainty associated with the cyclical and environmentally driven nature of the stock. Given the spread in public comments, Council staff and FMAT members noted that alternative 4c may be a fair middle point that considers both the biological and social requirements as required in MSA. Furthermore, alternatives 4c and 4d offer catches that increase steadily over the duration of the rebuilding plan, as compared to the constant harvest approach (4b) which rebuilds as quickly as possible with low harvest limits. According to the economist on the FMAT, alternative 4c and 4d offer higher gross and average revenues to the commercial sector compared to 4b. Furthermore, 4b has the potential to be particularly damaging to the commercial sector. The culmination of rebuilding plan alternative 4b could create an instability in market supply and weaken supply chain linkages in addition to offering the lowest economic returns to the commercial sector. This in turn could compound the commercial sector's economic burden by imposing several years of reduced market share due to low quotas during the rebuilding period. Council staff and FMAT members cautioned that once the stock is rebuilt, regulations could likely be liberalized.

For the reasons provided above, Council staff recommends alternative 4c. Moreover, alternative 4c uses the updated 2019 Council risk policy, which by design, evaluates current stock biomass in relation to its target and threshold and adjusts risk accordingly.

Sector Transfers

The reallocation process in this amendment will most likely reflect more recent fishery performance and reduce the need for sector transfers in the immediate future post rebuilding plan. The staff recommendation on sector allocations reduces the commercial allocation, which will likely result in limited quota to transfer from the commercial to recreational sector, should bi-directional transfers be preferred. Furthermore, sector transfers will not be allowed while the spawning stock biomass (SSB) is below the SSB threshold and if overfishing is occurring.

As with the FMAT, Council staff also notes the almost even split in support for bi-directional transfers (5a-2), but when accounting for the form letter, the vast majority of comments do support bidirectionality. Many of the public comments describe that alternative 5a-2 is more fair and equitable since transfers can be sent in both directions. For these reasons, ***Council staff recommends alternative 5a-2 and notes that the Council and Board will have the ability to make an informed decision on how to set transfers during the annual specifications process given the needs of both the commercial and recreational fishery at the time.***

For alternative set 5b, the FMAT and Council staff recommend alternative 5b-2, a transfer cap up to 10% of the ABC. A transfer cap that scales with biomass is a sound approach from a biological and process-oriented perspective. During times of lower biomass, it makes sense to be precautionary by limiting the amount of transferred quota to reduce the risk of a transfer

contributing to overfishing. Conversely, during times when biomass is much higher, the transfer cap would increase, allowing for more flexibility to address each sector's needs. The status quo option, which caps transfers from summing to a commercial quota greater than 10.5 million pounds, does not offer as much flexibility as alternative 5b-2. The 10.5-million-pound value is now outdated, considering biomass is projected to increase significantly throughout the rebuilding plan.

Management Uncertainty

Council staff and the FMAT noted that the majority of public comments supported the status quo alternative. However, individuals supported the post-sector split alternative, while organizations (and form letters) support the status quo alternative.

The FMAT and Council staff recommend alternative 6b. From a process perspective, this alternative allows the Monitoring Committee to be as precise as possible with applying a management uncertainty buffer to one sector without negatively affecting the other. The application of management uncertainty is more fair and equitable under alternative 6b and has received strong support from many user groups.

Summary of Recommendations

Recommendations are provided for each alternative set. At times, the FMAT did not make a consensus recommendation for a specific alternative set and only a Council staff recommendation is present.

Alternative	Management Issue	Recommendation
1: FMP Goals and Objectives		
Current	Status quo	
Proposed	Proposed	FMAT and Council Staff
2: Sector Allocations		
2a-1	83% Rec, 17% Comm (Status quo) 1981-1989: Landings-Based	
2a-2	89% Rec, 11% Comm 2014-2018, 2009-2018: Catch-Based	
2a-3	87% Rec, 13% Comm 1999-2018: Catch-Based	Council Staff
2a-4	86% Rec, 14% Comm 1981-2018: Catch-Based, 2014-2018 and 2009-2018: Landings-Based	
2a-5	84% Rec, 16% Comm 1999-2018, 1981-2018: Landings-Based	
2b-1	No Phase-in	FMAT and Council Staff
2b-2	Phase-in over preferred rebuilding plan duration	

Alternative	Management Issue	Recommendation
3: Commercial Allocations to the States		
3a-1	Status quo Old MRIP 1981-1989 (Amend 1)	
3a-2	5 year 2014-2018: Landings-Based	
3a-3	10 year 2009-2018: Landings-Based	Council Staff
3a-4	1981-1989 (50%) and 2009-2018 (50%) Landings-Based	
3b-1	No Phase-in	Council Staff
3b-2	Phase-in over preferred rebuilding plan duration	
3c-1	No Trigger	FMAT and Council Staff
3c-2	Pre-Transfer Trigger	
3c-3	Post Transfer Trigger	
3d-1	No Minimum Default Allocation	
3d-2	0.10% - Minimum Default Allocation	FMAT and Council Staff
3d-3	0.25% - Minimum Default Allocation	
4: Rebuilding Plan		
4a	No action/Status quo	
4b	Constant harvest: 4 years	
4c	P* approach: 5 years	Council Staff
4d	Constant F: 7 years	
5: Sector Transfers		
5a-1	No Action/Status quo	
5a-2	Bidirectional transfers	Council Staff
5b-1	No Action/Status quo	
5b-2	Sector transfer cap: up to 10% of ABC	FMAT and Council Staff
6: Management Uncertainty		
6a	No Action/Status quo	
6b	Post Sector-Split	FMAT and Council Staff

Bluefish Allocations and Rebuilding Amendment

FMAT Meeting: April 30, 2021 from 9:00 a.m. - 12:00 p.m.

Meeting Summary (Dated: May 12, 2020)

The objective of this meeting was for the Fishery Management Action Team (FMAT) to review the public comment summary document, Advisory Panel (AP) comments, and provide recommendations of preferred alternatives to be presented to the Council and Board at the joint meeting hosted by the Council in June. At the meeting, the Council and Board will take final action on the Bluefish Allocation and Rebuilding Amendment.

There are several issues that the FMAT believes are policy decision that should be made solely by the Council and Board with thorough consideration of the input provided thus far, but the FMAT made recommendations where they thought it was appropriate.

FMP Goals and Objectives

The FMAT discussed the public and AP comments on the proposed FMP Goals and Objectives and noted that the vast majority of comments support the proposed option. The FMAT considered a number of suggestions from the public and the AP but determined that the majority of comments received were already captured in the FMP Goals and Objectives, as currently written. For example, there were many comments received pertaining to managing the fishery based on optimum yield and recognition of many angler's preference to utilize the resource through catch-and-release. The FMAT felt that maintaining a sustainable spawning stock biomass (objective 1.1), providing fair and equitable access to all user groups (goal 2), and considering the economic and social needs and priorities of all groups (objective 2.2) already captures the definition of managing for optimum yield. In addition, several public comments suggested increasing recognition of the role that environmental factors and forage fish play in the health of the bluefish stock. Again, the FMAT thought that promoting science, monitoring, and data collection that support and enhance effective ecosystem-based management (objective 1.5) already captures the topic. While the FMAT agreed that the issues raised by the AP and members of the public are important considerations, the FMAT determined the proposed FMP Goals and Objectives already capture these important issues.

However, the FMAT did support implementing minor revisions to the language that were suggested during the public comment process. The revisions below (in red), reflect the comments that the FMAT recommends be considered by the Council and Board when taking final action. Specifically, the recommendation to change "discard" to "release" encompasses the catch-and-release aspect of the fishery while avoiding the negative connotation that accompanies the term "discard". This potential change carries the same message as using the term "discard" but better

suits the desires of the recreational community. The recommendation to change "along the coast" to "within the management unit" allows for the inclusion of inland bluefish consumers that do not live on the coast.

Goal 1: Conserve the bluefish resource through stakeholder engagement to maintain sustainable recreational fishing and commercial harvest.

- **Objective 1.1**: Achieve and maintain a sustainable spawning stock biomass and rate of fishing mortality.
- **Objective 1.2**: Promote practices that reduce ~~**discard**~~ release mortality within the recreational and commercial fishery.
- **Objective 1.3**: Maintain effective coordination between the National Marine Fisheries Service, Council, Commission, and member states by promoting compliance and to support the development and implementation of management measures.
- **Objective 1.4**: Promote compliance and effective enforcement of regulations.
- **Objective 1.5**: Promote science, monitoring, and data collection that support and enhance effective ecosystem-based management of the bluefish resource.

Goal 2: Provide fair and equitable access to the fishery across all user groups throughout the management unit.

- **Objective 2.1**: Ensure the implementation of management measures provides fair and equitable access to the resource across to all user groups ~~**along the coast**~~ within the management unit.
- **Objective 2.2**: Consider the economic and social needs and priorities of all groups that access the bluefish resource in the development of new management measures.
- **Objective 2.3**: Maintain effective coordination with stakeholder groups to ensure optimization of economic and social benefits.

Commercial/Recreational Sector Allocations

To start, the FMAT discussed the cyclical and environmentally driven aspect of the stock that is continuously commented on by the public. Given the stock's fluctuations in abundance and availability, the FMAT believes alternatives associated with a shorter time series may not be as appropriate for determining allocation between the two sectors. Ideally, capturing the fluctuations in abundance over time will best represent the trends in the bluefish fishery.

The FMAT also recommends utilizing catch data (landings plus dead discards) to inform allocations between the commercial and recreational sectors. The FMP currently stipulates that the allocation percentage be applied to the Acceptable Biological Catch to determine each sector's Annual Catch Target. In short, the allocation percentage will inform the allocation of catch between both sectors, not landings. In addition, the FMAT believes using catch data as the basis for the allocations of catch will more effectively encompass the needs of a large subset of the recreational sector that receive economic and social benefits from catching and releasing fish as opposed to harvesting fish. Given alternative 2a-5 is derived from landings data, the FMAT recommends not moving forward with this alternative.

Alternative 2a-3 received the most support, however, when excluding the form letter, the status quo alternative received the most support. The assessment scientist on the FMAT noted that the

status quo alternative does not represent the reality of the fishery anymore. The status quo alternative was based on uncalibrated MRIP estimates from 1981-1989. The uncalibrated MRIP estimates are no longer being used in the stock assessments or in catch accounting and should probably not be considered as the Council and Board discuss reallocation.

The economist on the FMAT noted that of the remaining alternatives, 2a-4 offers the highest economic benefit to the commercial sector followed by 2a-3 and 2a-2.

Ultimately, the FMAT did not offer a formal recommendation by consensus on one alternative from the alternative set 2a. The FMAT agreed that selection of an allocation alternative is ultimately a policy decision that should be made solely by the Council and Board with thorough consideration of the input provided thus far. ***However, the FMAT does recommend consideration of either alternatives 2a-2, 2a-3, and 2a-4.***

For the phase-in alternatives (alternative set 2b), the FMAT recommends alternative 2b-1 (no phase-in). This recommendation is consistent with the overwhelming majority of public comments which identified that the phase-in approach does not offer much benefit when the allocations are changing by such a small amount. Additionally, the phase-in approach would add an unnecessary level of complexity and administrative burden.

Commercial Allocations to the States

To start, the FMAT noted that all alternatives in set 3a are justified as appropriate under potential future circumstances and for various states, as this stock rebuilds and availability increases. ***Therefore, the FMAT made no recommendation on a preferred 3a alternative. Selecting an allocation alternative is a policy decision that should be made solely by the Council and Board with consideration of the Public Hearing Document's impact analyses and public input provided thus far.***

In regard to the option to phase-in, the FMAT indicated that the selection of a more recent time series to inform reallocation will more accurately reflect current state-specific needs and may reduce the need to phase-in any changes. Similar to the recommendation for the sector allocations, the FMAT noted that the phase-in alternative set was also unpopular. Again, the FMAT described the added levels of complexity and administrative burden to implementing a phase-in approach. As the allocation alternatives are based on landings data, a phase-in approach may prolong inefficiencies via the need for state transfers. However, the FMAT recognizes the public comments which highlights that there may be an economic benefit from phasing-in for states incurring a large percent decrease in quota. ***Overall, the FMAT did not provide a consensus recommendation for alternative set 3b.***

After reviewing all public comments related to the trigger alternative set (3c), the FMAT made a consensus recommendation for alternative 3c-1, no trigger. The FMAT noted that the public found the trigger approach to be overly complicated with limited perceived benefit.

Public comments related to the minimum default allocation alternative set (3d) were evenly dispersed across the three alternatives. The FMAT discussed the utility of implementing minimum default allocations in that they allow states to continue to harvest bluefish without major disruption

to other states with larger allocations. Considering the commercial allocations to the states section included 4 sub-alternatives, the FMAT believes the complexity tied to sub-alternative sets 3b and 3c may have influenced the public's perspective on minimum default allocations. ***However, given the cyclical and ever-changing nature of the bluefish fishery, the FMAT recommends a 0.10% minimum default allocation (3d-2).*** This alternative will allow states that would otherwise lose their allocation through the reallocation process to retain a minimum default allocation, which will allow small amounts of bluefish caught in these states to be retained instead of discarded. The FMAT agreed that 0.10% would strike a balance between reducing regulatory discards and not overburdening other states' allocations.

Rebuilding Plan

The FMAT discussed that the Magnuson-Stevens Fishery Conservation and Management Act (MSA) indicates: 109-479 (4) "For a fishery that is overfished, any fishery management plan, amendment, or proposed regulations prepared pursuant to paragraph (3) or paragraph (5) for such fishery shall —

(A) specify a time period for rebuilding the fishery that shall—

(i) be as short as possible, taking into account the status and biology of any overfished stocks of fish, the needs of fishing communities, recommendations by international organizations in which the United States participates, and the interaction of the overfished stock of fish within the marine ecosystem; and
(ii) not exceed 10 years, except in cases where the biology of the stock of fish, other environmental conditions, or management measures under an international agreement in which the United States participates dictate otherwise;

Given the data limitations, data concerns and associated uncertainty, selecting a rebuilding plan is an important policy decision that the Council and Board will need to make. However, the FMAT discussed the implications and consequences that may apply to each of the alternatives and offered the following discussion as supporting context for recommending a preferred rebuilding alternative.

Through this discussion, the FMAT noted that the rebuilding plan should be as short as possible while considering the needs of the fishing communities that depend on the resource and accounting for the uncertainty inherent in the cyclical and environmentally driven nature of the stock. Interestingly, the public comments indicated that individuals prefer alternatives 4b and 4c (relatively short rebuilding periods with lower short-term catches) while organizations prefer alternative 4d (the longest rebuilding period associated with higher short-term catches). ***Given the spread in comments, FMAT members noted that alternative 4c may be a fair middle point that considers both the biological and social requirements as required in MSA. Furthermore, alternatives 4c and 4d offer catches that increase steadily over the duration of the rebuilding plan, as compared to the constant harvest approach (4b) which rebuilds as quickly as possible with low harvest limits.*** Alternative 4c and 4d offer higher gross and average revenues to the commercial sector compared to 4b. Furthermore, 4b has the potential to be particularly damaging to the commercial sector. The culmination of rebuilding plan alternative 4b could create an instability in market supply and weaken supply chain linkages in addition to offering the lowest economic returns to the commercial sector. This in turn could compound the commercial sector's

economic burden by imposing several years of reduced market share due to low quotas during the rebuilding period. FMAT members cautioned that once the stock is rebuilt, regulations could likely be liberalized.

The stock assessment scientist indicated that the general comment provided by many members of the public that "the stock is cyclical/environmentally driven/and moving offshore; fishing mortality is not the problem" has merit and could influence the stock's ability to reach the rebuilt target. It is hypothesized that some components of the stock are not accessible to the inshore fishery (i.e., inshore charter and shore anglers) in certain years due to offshore migrations. Furthermore, the assessment scientist expressed concern that presently there are no offshore surveys that could pick up and verify these trends. In addition, there are limited tagging studies assessing regional bluefish abundance and migration. The last comprehensive study was published in 2006[1]. Therefore, certain data may not be available to inform the model, and in turn, rebuilding goals may not be met, which will have implications on how projections may change over time.

The FMAT wanted to ensure the Council and Board are aware of the implications, benefits, and consequences of all rebuilding alternatives. The FMAT recommends a review of the general rebuilding process, including regular reviews of adequate progress; as well as a thorough discussion of how the different rebuilding scenarios could look or change as data are updated.

Sector Transfers

The FMAT first discussed the fact that there were a number of public comments received that were asking for clarity on the interplay between the rebuilding plan and sector transfers. The FMAT clarified the criteria that dictate if and when a transfer could occur under the bi-directional transfer process alternative 5b. When the stock is in an overfished state or overfishing is occurring, transfers from one sector to the other cannot occur. However, once the stock is above the spawning stock biomass (SSB) threshold (not overfished) and if the fishing mortality rate is less than fishing mortality at maximum sustainable yield (or its proxy), a transfer can occur. In this scenario where a transfer can still occur, bluefish may be under a rebuilding plan (not yet at the SSB target), but no longer overfished or experiencing overfishing.

The FMAT noted that the public comments (excluding the form letter) were evenly split between supporting and opposing bi-directional transfers. Interestingly, many people commented on removing sector transfers from the FMP altogether, despite not being an alternative within this amendment. One FMAT member offered that the need for transfers should decline in the near future as the purpose of reallocating better suits each sector's present needs. ***However, the FMAT offered no specific recommendation on alternative set 5a and noted that it is more of a policy decision for the Council and Board.***

For alternative set 5b, the FMAT recommends alternative 5b-2 by consensus. The FMAT indicated that a transfer cap that scales with biomass is a sound approach from a biological and process-oriented perspective. During times of lower biomass, it makes sense to be precautionary by limiting the amount of transferred quota to reduce the risk of a transfer contributing to

[1] Shepherd, G.R. & Moser, Joshua & Deuel, D. & Carlsen, Pam. (2006). The migration patterns of bluefish (Pomatomus saltatrix) along the Atlantic coast determined from tag recoveries. Fishery Bulletin. 104. 559-570.

overfishing. Conversely, during times when biomass is much higher, the transfer cap would increase, allowing for more flexibility to address each sector's needs. The FMAT agreed that the status quo option, which caps transfers from summing to a commercial quota greater than 10.5 million pounds, does not offer as much flexibility as alternative 5b-2. The FMAT thought that the 10.5-million-pound value is now outdated, considering the biomass is projected to increase significantly in order to achieve the SSB target.

Management Uncertainty

The FMAT noted that the majority of public comments supported the status quo alternative. However, individuals supported the post-sector split alternative, while organizations (and form letters) support the status quo alternative.

The FMAT recommends alternative 6b by consensus. From a process perspective, this alternative allows the Monitoring Committee to be as precise as possible with applying a management uncertainty buffer to one sector without negatively affecting the other. The application of management uncertainty is more fair and equitable under alternative 6b and has received strong support from all sorts of user groups.

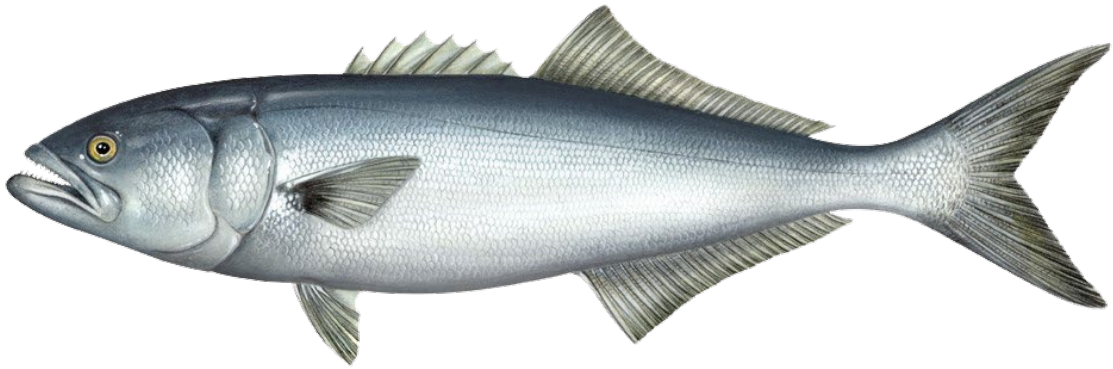
De Minimis

The FMAT discussed the *de minimis* alternative set and public comments and noted that the majority of comments were in favor of the status quo alternative (7a). One FMAT member noted that the Board will have to weigh the economic and social benefits of increased access for recreational fishers in *de minimis* states against the potential risk of shifts in effort from neighboring states resulting from more liberal measures within *de minimis* states' waters. ***Ultimately, the FMAT offered no specific recommendation because this is a Board-only policy decision.***

BLUEFISH ALLOCATION AND REBUILDING AMENDMENT

PUBLIC COMMENT SUMMARY DOCUMENT

MAY 2021



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

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

ATLANTIC STATES MARINE FISHERIES COMMISSION

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1 INTRODUCTION AND COMMENT SUMMARY

1.1 OVERVIEW

This document summarizes public comments on the Bluefish Allocation and Rebuilding Amendment. Through this action, the Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission (Commission) are considering potential modifications to the Fishery Management Plan (FMP) goals and objectives, current allocations between the commercial and recreational sectors, current commercial allocations to the states, initiating a rebuilding plan, revising the quota transfer processes, revising how the FMP accounts for management uncertainty, and revising *de minimis* provisions in the Commission's plan. Additional information and amendment documents are available at: https://www.mafmc.org/actions/bluefish-allocation-amendment.

Five virtual public hearings were held between March 24 and April 8, 2021, targeted toward certain states or regional groupings of states (Table 1). Hearings were attended by 134 people in total (excluding Council and Commission staff). Not all attendees provided comments.

Written comments were accepted from February 22, 2021 through April 23, 2021. In total 361 individuals or organizations either provided written comments (84) or sent in a form letter (277) on this action. Some of these commenters overlapped with those providing comments at hearings.

In total, 378 unique individuals and organizations provided comments during hearings and/or in writing. Attempts were made so that individuals who provided multiple comments (e.g., in person and written, multiple in person, or multiple written comments) were only counted once towards the tallies included later in this document. In some instances, individuals provided in-person comments on behalf of an organization and those organizations also submitted written comments. In those instances, the individual and the organization comments were counted as one comment. The tables below differentiated comments received from individuals, organizations, and via form letter to help provide a clear picture of the comments received.

All public hearing comments are summarized in Section 2 of this document and all written comments are included in Section 3.

Ninety-two percent of the 378 individuals and organizations who provided in-person and/or written comments were primarily affiliated with the recreational fishery, and 5% with the commercial fishery (Table 2). About 80% of the comments associated with the recreational fishery came from the form letter.

Table 1: Amendment public hearing schedule.

Date and Time	Regional Grouping
Wednesday, March 24, 6-8pm	North Carolina, South Carolina, Georgia, and Florida
Thursday, March 25, 6-8pm	Delaware, Maryland, Potomac River Fisheries Commission, and Virginia
Tuesday, March 30, 6-8pm	Connecticut and New York
Thursday, April 1, 6-8pm	Maine, New Hampshire, Massachusetts, Rhode Island
Thursday, April 8, 6-8pm	New Jersey

Table 2: Number of individuals and organizations who provided in-person and/or written comments (including 277 form letters which were associated with the recreational sector) by primary affiliation.

Sector	Individuals	Organizations	Percent of Total
Recreational	333	13	92%
Commercial	14	4	5%
Unknown/not specified	10		3%
Other	2	1	<1%
Multiple	1		<1%

1.2 COMMENT SUMMARY

Public comments are summarized in the text and tables below grouped by management issue (commercial/recreational allocation, commercial allocations to the states, rebuilding plan, sector transfers, management uncertainty, *de minimis*, and general comments). Only those topics addressed by more than three individuals or organizations, or those directly related to specific alternatives are included in the summaries below. However, all comments are included in sections 2 and 3 of this document.

A total of 37 commenters provided feedback on the FMP Goals and Objectives. Many of these comments were unique with specific suggestions making it hard to tally across similar comment themes. As such, comments contained in section 2 and 3 should be carefully read and considered. However, there were a few reoccurring themes that can be highlighted. For example, many commenters supported consideration of managing for optimum yield in the FMP Goals and Objectives. Four recreational organizations emphasized that the Magnuson Stevens Act (MSA) requires fishery management measures achieve optimum yield, defined as a fishery's maximum sustainable yield reduced by any relevant economic,

social, or ecological factor. Several other commenters referenced the socioeconomic benefit of reduced harvest and increased abundance to catch-and-release anglers. A few comments referenced the need for better accountability across both sectors. Several commenters said that "fair and equitable" should be clearly defined in the FMP Goals and Objectives. Several other individuals commented on the importance of forage fish, the need to improve our understanding of the ecological role of bluefish and expressed a desire to implement ecosystem-based management. A few other comments included recognizing the cyclical and environmentally driven nature of the bluefish stock. Lastly, a few individuals said that environmental stressors should be addressed, and they were concerned about the impacts of sand mining and beach replenishment on inshore bluefish habitat.

Feedback on the commercial/recreational allocation alternatives was mixed. An individual's or organization's primary sector affiliation is indicative of which alternative was supported. For example, 20 commenters supported status quo allocations, and the majority of these 16 individuals and 4 organizations were affiliated with the commercial sector. In total, 287 commenters supported reallocating 87% to the recreational sector and 13% to the commercial sector (alt 2a-3). This alternative received support from the most organizations and from 277 form letters. Alternative 2a-2, which allocates 89% to the recreational sector and 11% to the commercial sector, also received significant support from 12 individuals and 4 organizations. The remaining alternatives received support from less than 10 individuals and organizations. The vast majority of commenters were opposed to phasing in allocation changes with 296 opposed and only 5 in support. However, it is worth noting that most comments that were in support of status quo commercial/recreational allocations did not provide input on the phase-in alternatives.

Support was spread fairly evenly across all four state commercial allocation alternatives. That being said, alternative 3a-2 received the most support with 8 individuals and 3 organizations expressing this reallocation alternative as their preference. Generally speaking, commercial stakeholders from states who stood to benefit from reallocation voiced support for using a more recent time series. Conversely, commercial stakeholders from states that would lose quota from reallocation voiced support for status quo, with only a few exceptions. In total, eight commenters supported a phase-in approach, only slightly more than the 6 commenters that supported no phase-in. The vast majority of comments received on the trigger approach expressed how complicated the approach was and did not support its use in management. Nine individuals and organizations supported providing states with a minimum default allocation versus 5 commenters who were opposed to the idea. Many commenters expressed support for the minimum default allocations in an effort to reduce regulatory discards in states that would otherwise have no allocation.

A total of 293 commenters said they supported the 7-year constant fishing mortality rebuilding plan, 14 supported the 5-year P* approach, 12 supported the 4-year constant harvest approach, and 5 supported taking no action on rebuilding. A few individuals who supported the 7-year rebuilding plan also voiced support for implementing a 10-year plan to allow the stock plenty of time to rebuild. Ten commenters voiced skepticism that the stock would be able to rebuild by the target date. Several reasons were provided including: the stock is cyclical or environmentally driven, the population is offshore, and abundance will not be detected inshore, or fishing mortality is not a large factor in the stock's ability to rebuild. Seven commenters said that the lack of forage fish is a significant factor in the bluefish stock's ability to rebuild. Lastly, 20 individuals said that they rarely encounter bluefish anymore and that drastic and immediate action should be taken by the Board and Council to rebuild this stock.

A total of 288 commenters said they support bi-directional transfers between the sectors and 15 supported maintaining the status quo transfer process. Similarly, a total of 288 commenters supported a 10% sector transfer cap, and 12 supported the status quo cap of 10.5 million lbs. Commenters who provided a rationale

for not allowing b-directional transfers tended to say that they were wary of using Marine Recreational Information Program (MRIP) data to analyze the recreational sector's short term need for quota. Those who supported bi-directional transfers often mentioned equity as an important reason for allowing transfers both ways. Many commenters did not think transferring quota during a rebuilding period was a good idea. Finally, 17 individuals and 6 organizations thought that quota should not be transferred between sectors at all.

In regard to the management uncertainty issue, 6 individuals, 8 organizations and the 277 people who submitted a form letter were in support of making no changes to the way that management uncertainty is applied through specifications. By contrast 19 individuals and 5 organizations recommended updating management uncertainty so that it may be applied to each sector without negatively affecting the other sector.

A total of 14 commenters supported the status quo *de minimis* alternative that only exempts states from fishery independent monitoring. Approximately the same number of commenters supported updating the *de minimis* provision to allow states some level of flexibility in setting recreational measures, but support was spread amongst alternatives 7b-e. Those who voiced support for updating *de minimis* said that anglers should be allowed to have unrestrictive measures when fishing in states where bluefish are rarely encountered. Others said that it should not matter what their measures are considering that they have minimal impact on the health of the stock.

Reoccurring general comments are also listed at the end of the table. These comments either pertain to multiple management issues or are not directly related to the management issues under consideration in this amendment. Twenty-two individuals and organizations said that management should account for the catch-and-release aspect of the fishery and recognize the value of fish left in the water. The context in which this was said varied by commenter, but many said this in reference to managing for higher abundance to recognize the economic value of the sport fishing industry. Many also shared this sentiment in support of halting sector transfers. Ten commenters said that recreational reporting and accountability need to be improved, and similarly 4 individuals thought that the recreational discarding issue should be addressed by management. Nine commenters expressed strong concerns with using the MRIP data for management and thought that the data was not believable. The remaining reoccurring comments were in reference to the recreational bag and size limit or expressing the need to increase or lower the commercial quota.

Table 3: Summary totals of comments received on the amendment. Totals should not be summed between rows as this would result in double counting of individuals and organizations who commented in multiple categories.

Management Issue		Number of Form Letters/Individuals/Organizations			
Commercial/Recreational Allocation		**Form Letter**	**Individuals**	**Organizations**	**Grand Total**
2a-1	83% Rec, 17% Comm (Status quo)		16	4	20
2a-2	89% Rec, 11% Comm		12	4	16
2a-3	87% Rec, 13% Comm	277	3	7	287
2a-4	86% Rec, 14% Comm		8	1	9
2a-5	84% Rec, 16% Comm		3	1	4
2b-1	No Phase-in	277	9	10	296
2b-2	Phase-in		2	3	5
Commercial Allocations to the States		**Form Letter**	**Individuals**	**Organizations**	**Grand Total**
3a-1	Status quo		8	1	9
3a-2	5 year		8	3	11
3a-3	10 year		8	2	10
3a-4	½ 1981-1989 and ½ 2009-2018		6		6
3b-1	No Phase-in		5	1	6
3b-2	Phase-in		5	3	8
3c-1	No Trigger		7	2	9
3c-2	Pre-Transfer Trigger		1		1
3c-3	Post Transfer Trigger				
3d-1	No Minimum Default Allocation		3	2	5
3d-2	0.10% - Minimum Default Allocation		4	1	5
3d-3	0.25% - Minimum Default Allocation		3	1	4
Rebuilding Plan		**Form Letter**	**Individuals**	**Organizations**	**Grand Total**
4a	Status quo/No action		5		5
4b	Constant harvest (4 years)		11	1	12
4c	P* approach (5 years)		12	2	14
4d	Constant F (7 years)	277	5	11	293
General comments on rebuilding	Stock is cyclical/environmentally driven/offshore; fishing mortality is not the problem		7	3	10
	Bluefish abundance is low/we do not see bluefish anymore/immediate and drastic action needed		20		20
	Bluefish stock is hurt by low abundance of forage fish		6	1	7

Management Issue		Number of Form Letters/Individuals/Organizations			
Sector Transfers		**Form Letter**	**Individuals**	**Organizations**	**Grand Total**
5a-1	No Action/Status quo		12	3	15
5a-2	Allow transfer both ways	277	5	6	288
5b-1	No Action/Status quo		10	2	12
5b-2	Sector transfer cap: 10%	277	5	6	288
General comments on transfers	Quota should not be transferred between sectors		17	6	23
Management Uncertainty		**Form Letter**	**Individual**	**Organization**	**Grand Total**
6a	No Action/Status quo	277	6	8	291
6b	Post Sector-Split		19	5	24
De Minimis		**Form Letter**	**Individual**	**Organization**	**Grand Total**
7a	No Action/Status quo		12	2	14
7b	Recreational De Minimis – no management measures		2		2
7c	Recreational De Minimis – state-selected management measures		2	2	4
7d	Recreational De Minimis – rollover management measures		2		2
7e	Recreational De Minimis – 2020 management measures		4	1	5
General Comments		**Form Letter**	**Individual**	**Organization**	**Grand Total**
Management should account for the catch-and-release fishery (value of fish left in the water)			13	9	22
Recreational reporting and accountability need to be improved			7	3	10
Implement a minimum size limit			9		9
Strong concerns with MRIP data; unbelievable/unreliable			6	3	9
Lower the bag limit			6		6
Increase the bag limit			3		3
Cut the commercial quota			6		6
Increase the commercial quota			4		4
Address recreational discard issue			4		4

2 PUBLIC HEARING SUMMARIES

A summary of each public hearing is provided below. Due to the complexity and high number of amendment alternatives, each management issue was presented and commented on individually. Comments are summarized by hearing and individual comments are grouped by management issue and paraphrased.

2.1 NORTH CAROLINA, SOUTH CAROLINA, GEORGIA, AND FLORIDA

Wednesday, March 24, 2021, 6:00 p.m.

Attendees: (18 excluding Council/Commission staff): Chris Batsavage, Michael Carotta, Michelle Duval, James Fletcher, Cynthia Ferrio, Sonny Gwin, Hannah Hart, Doug Haymans, Dewey Hemilright, Rusty Hudson, William Mandulak, Thomas Newman III, Will Poston, Art Smith, Eric Summers, Sara Winslow, Amy Zimney, Wes Townsend

Summary: The meeting started with an introduction and briefing from the hearing officer Chris Batsavage (NC). Five members of the public offered public comment on the amendment alternative sets. The majority of comments were focused on the allocation alternatives with an emphasis on ensuring quotas remain at levels that support positive fishery participation from both sectors. Some members of the public expressed their frustration with the complexity of alternatives associated within the commercial allocations to the states. The two who spoke on this issue were supportive of maintaining status quo commercial allocations for their respective state to ensure quotas do not fall much lower than the current levels. Feedback was mixed on how to proceed with the rebuilding plan and the transfer process. Members of the public did express their frustration with the current stock status and offered comments to that effect. The two comments received on management uncertainty were in support of adopting sector specific management uncertainty. Finally, the one comment received on *de minimis* status voiced support for status quo. Questions from the public mainly focused on the new MRIP estimates, the overfished stock status, current quotas and management measures, and the transfer provisions.

Comments

<u>FMP Goals and Objectives</u>

- **William Mandulak (Recreational – NC)**: I am concerned about how you are going to evaluate sustainable harvest, given migratory patterns of bluefish. Are you taking measurements from ME-FL? How are you going to do that? In that objective, you said promote practices that reduce discard mortality within the commercial/recreational fishery. Does that mean if we find discard mortality is high in gillnets/trawl we ban that gear? I am confused when you say we are going to give fair and equitable access. If you have 1,000 people on the beach fishing for bluefish, and maybe 1000 commercial fishermen fishing for bluefish, how do you determine equitability?

<u>Commercial/Recreational Allocation</u>

- **William Mandulak (Recreational – NC)**: Many of the changes increase the recreational allocation. However, over a long period of time there were transfers from the recreational to the commercial sector. Without knowing what the specific impacts are going to be on the fishermen that are on the beach, we might as well just take the most we can get. But, I think it's important to provide a maximum allocation to the commercial sector as well. Therefore, keep things status quo for now.

- **Thomas Newman (Commercial – NC)**: 2a-1 (status quo) allows for adequate commercial allocation. Commercial fishing reporting and accountability happens in real time during the season. Last year, we went to a 300-pound limit to avoid going over our limit. The recreational sector catch is not accounted for until later in the year. We have no bycatch in our gillnet fishery.
- **James Fletcher (United National Fisherman's Assocation, Commercial – NC)**: We are using MRIP data which is considered the best available science. It looks to me that we are overfished because of the MRIP estimates. These estimates are not based on data from individual fishermen. Would we be better off to require every saltwater recreational fisherman to register?
- **Rusty Hudson (Directed Sustainable Fisheries, Inc., Other – FL):** Florida has increased its commercial landings in the recent past. Do not lose us in the next stock assessment because we have had a good signal. Status quo or 2a-5 to offer a reasonable allocation to the commercial sector.

Commercial Allocations to the States

- **Thomas Newman (Commercial – NC)**: Status quo across the board. I may not be well versed in it all, but I think the fishery has been managed well. Status quo for trigger and minimum default as well.
- **Michael Carotta (Commercial - MA/NC)**: Status quo because I am not comfortable in the disparity in some of the proposed alternatives.

Rebuilding Plan

- **James Fletcher (United National Fisherman's Assocation, Commercial –NC)**: 2006 MSA required recreational anglers to register. Why do we have to follow MSA under this rebuilding plan? Commercial landings in NC have decreased due to lack of access to the resource, because inlets have been closed which doesn't allow boats to go out easily. We must comply with all requirements of MSA! The Council should have individual registration of recreational fishermen. When is management going to come up with something new to solve the problem? Would it be possible for the Council and ASMFC to have foreign scientists to come in and see if this stock is actually overfished?
- **Thomas Newman (Commercial - NC)**: The commercial sector has a long history of understanding their harvest. Commercial limits should not change because we have not gone over limits and do have the ability to close when necessary. We need real time recreational data. I do not have a lot of faith in the MRIP data. We want to continue to harvest at the rate we are at now.
- **William Mandulak (Recreational – NC)**: It is frustrating that we have been under our limits by transfers, but now we do not have that ability to transfer since we are overfished. As a recreational fisherman that wants to be fair to both sectors, I suggest alternative 4d. The longer-term plan allows for the stock to recover over more time and allows the fishery to get to a higher biomass level.

Sector Transfers

- **Thomas Newman (Commercial - NC)**: 5a-1 and 5b-2. Status quo has been working very well for the commercial sector.

- **William Mandulak (Recreational – NC)**: Why do we do transfers at all? If the stock is not overfished, I would support 5a-2 to allow bidirectionality.
- **Michael Carotta (Commercial - MA/NC)**: As a commercial fisherman I am more and more aware of the place recreational bluefish holds in the culture. Family, kids, and fishermen are thrilled to go blue fishing. I am against any transfer that puts the recreational fishermen's quota at risk. Secondly, I was hoping more of this hearing to focus on abundance and how we can conserve the fishery. There are bigger and more important things to talk about to restore the fishery.

Management Uncertainty

- **Thomas Newman (Commercial - NC)**: Each sector should be responsible for its own management uncertainty. I support 6b.
- **James Fletcher (United National Fisherman's Assocation, Commercial – NC)**: Why is fisheries management associated with so much uncertainty?
- **William Mandulak (Recreational)**: There will always be management uncertainty since these fish are always on the move (chasing bait and different water temperatures). The best we will ever be able to do is to have a level of uncertainty we are able to deal with. If I had to vote, each sector should have their own uncertainty. Therefore, I support 6b.

De Minimis

- **Thomas Newman (Commercial - NC)**: De minimis states should have the same regulations as the rest of the states (status quo – 7a). All states should have the same federal measures.

2.2 DELAWARE, MARYLAND, POTOMAC RIVER FISHERIES COMMISSION, AND VIRGINIA

Thursday, March 25, 2021, 6:00 p.m.

Attendees (24 excluding Council/Commission staff): Chris Batsavage, John Bello, Joan Berko, Alan Bianchi, Ellen Bolen, John Clark, Eric Durell, Michelle Duval, James Fletcher, John Ford, Martin Gary, Pat Geer, Sonny Gwin, Dewey Hemilright, Michael Luisi, Olivia Phillips, Michael Platt, Will Poston, Somers Smott, David Stormer, Jonathan Watson, Angel Willey, Roger B Wooleyhan Jr, Erik Zlokovitz

Summary: The meeting started with an introduction and briefing from the hearing officer Mike Luisi (MD). This hearing experienced low turnout and as a result there were only four individuals who provided a comment or question on the management issues. Three of the four people who spoke were Council members. The one member of the public who spoke at the hearing said that bluefish is currently not a priority commercial species for this region. While he was supportive of a lower commercial allocation to Delaware, he wanted to ensure that state to state transfers remain as an option to allow access to the resource should it become more abundant in the future. Staff were also asked several questions regarding when amendment changes would be implemented, the rebuilding timeline, and if rebuilding should be removed from the amendment.

Comments

FMP Goals and Objectives

No comment offered.

Commercial/Recreational Allocation

- **Roger Wooleyhan (Commercial – DE):** When will we know what the state specific quotas will be after you make these changes?
- **Sonny Gwin (Council Member – MD):** Have there been any problems with the transfer provisions? Is there a race to access quota transfers? In MD, we have been not catching our full quota and have been transferring it away. If through reallocation we lose quota, we may not have the ability to use excess quota or transfer it away.

Commercial Allocations to the States

- **Roger Wooleyhan (Commercial - DE):** In the 1970s there were a lot of people who were catching bluefish. Nowadays bluefish isn't worth much and people fish for other species. There are only a few commercial fishermen targeting bluefish in our area. Larger bluefish are moving further offshore, and we do not go far enough out to target them. However, I am concerned that because we haven't been fishing for bluefish we could lose access to quota. I don't want a situation where bluefish become abundant again later on and we aren't be able to catch them. If state-to-state transfers are able to be used in the future to give us access to bluefish, I would be ok with smaller allocations since our current effort is so low.

Rebuilding Plan

- **Mike Luisi (Council Member - DE):** Do you think there is any chance that we will need to pull rebuilding out of this amendment to address it more quickly?
- **David Stormer (Council Member - DE):** Do you think the 7-year rebuilding plan will be able to be fully rebuilt within the 10-year MSA requirement given this started in 2019?

Sector Transfers

No comment offered.

Management Uncertainty

No comment offered.

De Minimis

No comment offered.

2.3 CONNECTICUT AND NEW YORK

Tuesday, March 30, 2021, 6:00 p.m.

Attendees: (36 excluding Council/Commission staff): Chris Batsavage, Alan Bianchi, Christopher Borgatti, Colleen Bouffard, Gary Bowman, Ted Burdacki, Floyd Carrington, Maureen Davidson, Justin Davis, John DePersenaire, Anthony DiLernia, Sandra Dumais, Michelle Duval, Mark Ellis, Julie Evans, James Fletcher, Dan Farnham, Dan Farnham Jr., Cynthia Ferrio, Timothy Froelich, Tom Fuda, Matthew Gates, William Goeben, Kurt Gottschall, Emerson Hasbrouck, TJ Karbowski, James Monzolli, Jeff Moore, Jerry Morgan, Cheri Patterson, Mike Plaia, Will Poston, Paul Risi, Deri Williams, Steven Witthuhn, Erik Zlokovitz

Summary: The meeting started with an introduction and briefing from the hearing officers, Maureen Davidson (NY) and Justin Davis (CT). In total, eight people offered comments on the amendment alternative sets. Comments offered under the FMP goals and objectives section consisted of several on the water observations, but a few individuals commented on the fact that there is economic benefit to caught and released bluefish. Four people supported status quo commercial/recreational allocations. Of the comments received on commercial allocations to the states, two individuals supported using the hybrid time series that recognized historical landings and recent trends. One individual supported alternative 3a-3d-2, which would provide a minimum default allocation of 0.1% to every state. Regarding rebuilding, one person supported 4b, another 4d, and two others offered their thoughts on why the rebuilding options are problematic. When sector transfers were discussed, two people supported bi-directional transfers, one person supported the status quo process, and two people supported the status quo transfer cap. In regard to management uncertainty, two people spoke in favor of sector-specific management uncertainty (6b). Lastly, one individual supported *de minimis* alternative 7e, which would allow *de minimis* states to set recreational management measures equal to those that were in place in 2020.

Questions from the public covered a variety of topics including the overfished stock status, current quotas and management measures, the validity of the new MRIP estimates, and whether the transfer provisions can occur during rebuilding. Some were concerned about the probability of rebuilding within 10 years and the consequences of not rebuilding within the set timeframe. Others asked why the ten-year plan was not included in the alternative set and thought that ten years would be the best rebuilding duration. Many members of the public expressed frustration with the complexity of the alternatives. Individuals offered their perspective on aspects of the amendment they understood; however comments may have been limited because individuals did not want to comment on alternative sets they did not fully understand. Staff indicated they are happy to work with any members of the public offline to better understand all the alternatives.

Comments

FMP Goals and Objectives

- **Tom Fuda (Recreational - CT)**: The goals and objectives talk about discard mortality. There is a recreational sector that practices catch and release. To this group, a released fish is not a wasted fish. The goals should consider the fact that there is economic benefit associated with released fish.
- **TJ Karbowski (For-Hire - CT):** There is little retention for recreational anglers. Bag limits were 15 fish and now they are at 3 fish. Often, we do not keep too many fish. To put a rough estimate, out of 100 fish that hit the deck, we maybe only kept 10.

- **Timothy Froelich (Commercial - NY):** How and why are we now under strict management measures? The fishery was over managed to the point where we were not able to harvest enough fish. The larger fish ate the smaller fish and then the older fish died of old age. As water quality deteriorates the bluefish migrate further offshore to cleaner water. They are no longer where they once were.
- **James Fletcher (United National Fisherman's Assocation, Commercial - NC):** I agree with the water clarity comment. Also, why are we using MRIP to manage these fish? Why do we still not have required recreational reporting? Why has management not mandated barbless hooks as a better release practice if this is a catch and release fishery? We need to go to an international party to assess stock status. NMFS says we are overfished, but we are not!
- **TJ Karbowski (For-Hire - CT):** I do not know the specifics of the year classes. However, these fish spawn more offshore where we cannot keep tabs on them. It is a cyclical spawning issue. This is not a recreational or commercial fishing issue. In 2013, we had the last year of alligator bluefish in Long Island Sound, after that, the menhaden were basically gone. Besides the 2020 season, there were not many menhaden in recent years. The small harbor-sized bluefish eat bay anchovies. The larger bluefish are following bunker around. This past year we caught large bluefish and large stripers that were following the menhaden. When NC banned omega protein from their waters in 2014, they depleted the menhaden fishery farther north. Since then, we have problems with Omega protein exceeding their cap in our waters.

<u>Commercial/Recreational Allocation</u>

- **Tom Fuda (Recreational - CT)**: In favor of status quo, no action.
- **TJ Karbowski (For-Hire - CT):** Status quo unless there is a large increase in commercial demand. We have to pick and choose our battles. Ultimately, the recreational sector is not affecting these fish.
- **Dan Farnham Jr. (Silver Dollar Seafood Inc., Commercial - NY):** I know overfishing is not currently occurring, but how close are the recreational landings to the RHL? Also, what is the rate of dead discards? Why is there not an alternative that would readjust the historical allocation (1981-1989) using recalibrated MRIP estimates as we have done for black sea bass and scup? For the alternatives, I prefer status quo, but I would like to see the 1981-1989 data use the recalibrated estimates instead.
- **Mike Plaia (Commercial/Recreational - CT/RI):** Try to get the allocations in line with revised MRIP data. I prefer 2a-4 or 2a-5 with no phase-in.
- **Timothy Froelich (Commercial - NY):** Status quo for now. I agree with Dan Farnham that one side should not be restricted while the other sector has accountability measures. For NY the quota was 200,000 pounds, which is not large enough to have a fishery. Last year, we were constrained by our limits very early in the year. Bluefish are so abundant that we struggle to avoid them while fishing for other species.
- **Tony DiLernia (Council member - NY):** I want to give historical context to the amendment 1 decision and why I supported (at that time) the ability to transfer from the recreational sector to the commercial sector. From 1981-1989 I was active on headboats. When fish were caught by headboats they were caught recreationally but often sold commercially. That is why I support the

transfer. While some of those fish were counted as recreational fish, they were sold as commercial fish.

- **James Fletcher (United National Fisherman's Assocation, Commercial - NC):** Tony brings up a good point - If the recreational sector was selling fish we should see if that was illegal or not (at the time). ASMFC is not requiring saltwater anglers to register. Why are we enforcing the need to rebuild but not enforcing the 2009 saltwater registration requirement? We need to implement total retention and ban barbless hooks.
- **TJ Karbowski (For-Hire - CT):** 99.99% of the time bluefish are caught right in the mouth and I do not see any reason to mandate the hooks for bluefish. Once you know how to use a de-hooker or pliers, there is little to no damage and it does not affect mortality.

Commercial Allocations to the States

- **Timothy Froelich (Commercial - NY):** Even if NY doubles its allocation, the 200,000-pound quota doubled is still only 400,000 pounds, which is still not enough. The 200-pound trip limit is too restrictive. A 400-pound trip limit still needs to be increased. If we keep going back and using the wrong data, then this whole management action is misguided.
- **Tony DiLernia (Council member - NY):** Helping to clarify Tim's concerns - While many fish were caught in a recreational manner and were allocated to the rec community, many were shipped into the commercial market. With that in mind, 3a-2 gets an increase, but NJ gets a decrease. I cannot support this because it decreases NJ's allocation. This also happens for 3a-3. Therefore, I would support 3a-4 because it supports both NY and NJ (slight loss).
- **Tom Fuda (Recreational - CT)**: State-to state transfers will still occur, correct? Then, select an option that uses more recent data. I have no strong preference because I am a recreational guy.
- **TJ Karbowski (For-Hire - CT):** We need to ensure the recreational sector does not end up with a smaller bag limit.
- **Dan Farnham Jr. (Silver Dollar Seafood Inc., Commercial - NY):** These alternatives are quite convoluted. However, I support a minimum default allocation for states. In support of 0.1%, because it is the current minimum for other states. The reason I did not want to base com/rec allocation on an updated time series was because of the unrestricted angler phenomenon. But when it comes to commercial allocation, this is not an issue because we are not discussing recreational accountability. I'm in support of the hybrid approach 3a-4 which gives weight to recent landings trends while also respecting historical landings and allocation.
- **James Fletcher (United National Fisherman's Assocation, Commercial - NC):** This does not address the conditions in NC with the problem of the inlet where sometimes commercial vessels have to land fish in VA. The organization I represent used to have 237 vessels, and all but 18 gave up their permits to NY. I'm dumbfounded why every species we are managing benefits NY; NY will not accept what they turned in on their records and NY does not trust their own data. I'm also frustrated that we are calling MRIP best scientific information available. All in all, agencies have not done their job.

Rebuilding Plan

- **John DePersenaire (Recreational Fishing Alliance - NJ)**: Fishing mortality has a diminishing return on SSB. I assume that environmental factors are at play. Why do we not have 10-year plan? What happens if we do not make adequate progress towards rebuilding?
- **TJ Karbowski (For-Hire - CT):** These rebuilding plans use MRIP numbers and thus are not useable. I 100% agree with this chart in terms of what happened in 2014. The ecosystem in Long Island Sound "died" during this time. There was nothing going on in the spring (maybe road salt added to the problem). This was the same time Omega Protein got kicked out of NC.
- **Mike Plaia (Commercial/Recreational - CT/RI):** I support 4b because it gets us there quickly, but most importantly, within 10 years.
- **Tom Fuda (Recreational - CT)**: What we are talking about is doubling the SSB (in regards to rebuilding to the target). How achievable is that? Menhaden are managed using ecological reference points and ecosystem-based management. The striped bass population is considered part of this process. How does this factor in Bluefish? I prefer 4d, the 7-year plan. I do not think the 4-year plan is good because it will keep catch low for 4 years and then greatly increase the limits, which will be an issue. I prefer a more gradual approach where catch is allowed to increase gradually as the stock rebuilds.
- **James Fletcher (United National Fisherman's Assocation, Commercial - NC)**: What we miss by not including data prior to 1984 is the understanding that Russian's were fishing dogfish, which allowed bluefish to reach a high population level. We are not managing any fishery right because of one predator. Is NMFS supporting the dogfish population to throw off management for all other species?

Sector Transfers

- **Mike Plaia (Commercial/Recreational - CT/RI):** Would these transfers occur during the rebuilding plan? I prefer status quo for both sets (5a-1 and 5b-1).
- **Tom Fuda (Recreational - CT)**: 5a-2 because it would prevent transfers when the stock is overfished. I prefer 5b-1 for the transfer cap.
- **John DePersenaire (Recreational Fishing Alliance – NJ)**: 5a-2 makes sense from an equity standpoint. But I am opposed to transfers until we can get to reasonable regulations on the recreational side. The recreational regulations are too restrictive right now and transfers should not occur until they are fixed.

Management Uncertainty

- **TJ Karbowski (For-Hire - CT):** Does management uncertainty account for MRIP uncertainty? Having management uncertainty for MRIP needs to be included in management. New MRIP has to be factored into the decision.
- **Mike Plaia (Commercial/Recreational CT/RI):** I prefer 6b.
- **Tom Fuda (Recreational - CT)**: I prefer 6b.

De Minimis

- **Tom Fuda (Recreational - CT)**: I am in favor of 7e because it implements consistent regulations coastwide.

Other

- **TJ Karbowski (For-Hire - CT):** As an example, MRIP has us taking thousands of fish from shore, where there are no fish up here. For BSB they have us (CT) taking a ton of fish during the winter when no one is fishing. We have sat here for 2 hours, we have heard that commercial sector is not catching the fish, recreational sector is not catching fish, I conclude that we have a YOY survival rate problem. We need to focus on the root issue, which is the survival rate of bluefish, not the issues addressed here today.
- **James Fletcher (United National Fisherman's Assocation, Commercial - NC)**: Maybe we need to look at our science differently. Can we pull regulations from bluefish entirely? See if the fishery manages ok on its own. I don't know of any fishery that has been fished to extinction.

2.4 MAINE, NEW HAMPSHIRE, MASSACHUSETTS, AND RHODE ISLAND

Thursday, April 1, 2021, 6:00 p.m.

Attendees: (46 excluding Council/Commission staff): Mike Andresino, Chris Batsavage, Owen Baute, Gerald Belastock, Rick Bellavance, Alan Bianchi, Kali Boghdan, Paul Caruso, Jack Creighton, James Cullen, Mike DeAnzeris, Michelle Duval, Dave Eisner, Peter Fallon, Dan Farnham, Jay Farris, Cynthia Ferrio, Kimberly Fine, Corey Gammill, Steven Grust, David Gullette, Dewey Hemilright, Raymond Kane, John LaFountain, Nicole Lengyel Costa, John Manteiga, Parker Mauck, Joe Mckenna, Nichola Meserve, Ethan Minichiello, David Monti, Anthony Nascimento, Dale Newton, William Nicholson, Cheri Patterson, Michael Pierdinock, Will Poston, Kermit Robinson, Sarah Schumann, Eric Summers, Lou Tirado, Sam Truesdell, Megan Ware, Anna Webb, Katie Perry, Keith Yocum

Summary: The meeting started with an introduction and briefing from the hearing officer Nicole Lengyel (RI). In total, eight members of the public offered comments on the amendment alternative sets. Several comments were made in regard to the FMP goals and objectives, but two reoccurring themes stood out. Two individuals said that "fair and equitable" should be better defined. Additionally, two individuals thought it important that the catch and release aspect of the recreational fishery be recognized. On the subject of the commercial/recreational allocation, three people supported alternative 2a-2, two people supported status quo, and one person supported 2a-3. Four individuals supported updating the state commercial allocations to alternative 3a-2. The three attendees who provided input on a preferred rebuilding alternative agreed that the stock should be rebuilt as quickly as possible and as such, supported alternative 4b. In regard to transfers, three people said that sector transfers should not be continued, but one individual supported the status quo transfer process, and another thought the transfer cap should be updated (5b-2). Lastly, one individual voiced support for sector specific management uncertainty and *de minimis* alternative 7e.

Staff received a lot of technical questions on the amendment, a few of the reoccurring and more substantive questions are included below. A few people asked how the commercial and recreational allocations were calculated and what data was used. Two individuals asked why there was no alternative that used the same base years with new MRIP data. Staff also received questions on the rebuilding plans including: why a ten year option was not included; if rebuilding to the target was considered realistic; and why the stock was considered overfished.

Comments:

FMP Goals and Objectives

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** Overall, the amendment is a reset due to MRIP, more so than a reallocation. Like striped bass, we need to look at the value of the fish left in the water. The availability of fish is what drives the demand. This is largely a catch and release fishery. The value of bluefish to the recreational community is very high; bait and tackle shops, fuel, charter trips, generate a lot of economic activity. The commercial value is quite low. We support catch data over landings data. We support goals and objectives that recognize keeping this value of fish in the water as the highest economic concern. This is a key component of considering economic and social needs of all groups as is described in objective 2.2.
- **Rick Bellavance (Priority Charters, For-Hire/Commercial – RI):** The proposed goals are much better than the existing goals, and strongly recommends that the Commission and Council consider updating the FMP. In particular goal 2 is extremely important. However, "fair and equitable" is quite subjective, so if we can further define those terms it would improve the overall message. Goal 2 addresses the fact that many stakeholders utilize the bluefish resource. These goals support all stakeholders, regardless of whether you want to eat bluefish, harvest them yourself, or catch and release them.
- **Owen Baute (Recreational – RI):** How do you define stakeholder engagement? How do you plan to achieve that?
- **Mike Pierdinock (For-Hire - MA):** I would like to recommend that "equitable access to all user groups" be defined. At times, bluefish are used as bait, food, and catch-and-release and we want all user groups represented.

<u>Commercial/Recreational Allocation</u>

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** Can you explain the difference between how catch vs landings data is allocated? In regard to the allocations, I would like to see catch data used so each fishery has their own sector specific discards. I support 2a-2 or 2a-3 because these alternatives use catch data and are based on more recent years, but I would like to see what the status quo option with updated MRIP estimates looks like. In regard to the phase-in, we support 2b-2.
- **John LaFountain (Fox Seafood Inc., Commercial – RI):** Why are there no alternatives higher than 17% for the commercial sector? Considering how low the other commercial allocations are, I support status quo. I am surprised there is not an option with a higher allocation for the commercial sector. We also feel that the MRIP data is highly inflated, and the fish are not coming as close to shore where the recreational guys are. The commercial fishery is quite healthy but has been restricted by a low quota. Bluefish is a food source that should be enjoyed by the public. This is a fishery which can be harvested by smaller boats which supports local fishermen. Small-scale commercial fishing operations rely on bluefish, and they have made investments that depend on access to the resource, we cannot decrease their access. Also, when I hear reports that recreational anglers are unable to catch three fish, I question the validity of MRIP data and think the estimates are inflated. Bluefish are migrating through, but they are staying offshore.
- **Mike Pierdinock (For-Hire – MA):** How did you come up with the phase-in time periods and why is there no 10-year option?

- **Rick Bellavance (Priority Charters, Recreational/Commercial – RI):** Why isn't there an alternative that uses the original base years with new MRIP information? I support using the catch-based approaches that you have proposed.
- **Eric Summers (Recreational - MA):** I support 2a-2 to increase the recreational allocation to 89%.
- **Mike DeAnzeris (Commercial – MA):** I support the comments proposed by John LaFountain. Status quo because the fish are most valuable to the smaller boats that bring catch to the local markets. The fishery is well suited to day-boat catch. Make sure the quota is accessible in a proper manner, so fresh fish can be distributed quickly. Bluefish should be caught and marketed within a day or so to economically benefit local communities.
- **Steven Grust (Recreational – NJ):** I support 2a-2 but I am concerned that there is not a minimum size limit to help conserve the stock. Many people harvest small bluefish for bait and that definitely affects the health of the stock.

Commercial Allocations to the States

- **John LaFountain (Fox Seafood Inc., Commercial – RI):** I support 3a-2 because 5 years is a long enough period to know what the current trends in abundance are. In Rhode Island there are plenty of bluefish, and other states are not harvesting them. These fish seem to not spend much too time down south. The proposed goals and objectives support economic efficiency and fair access for fishermen. Rhode Island needs a larger quota so that their fishery isn't closed in the fall when the run of bluefish occurs.
- **Steven Grust (Recreational – NJ):** I support 3a-2. A 5-year time series is long enough to pick up on the migration patterns of bluefish. In NJ it's rare to see more than 3 fish caught a day.
- **Rick Bellavance (Priority Charters, Recreational/Commercial – RI):** The 5-year average is the smart way to go (3a-2). I also support a minimum default allocation to convert discards to landings (3d-3). I support a phase-in because some of the changes are significant.
- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** I support 3a-2 and a minimum default allocation (3d-3). The trigger approach is too complex. For phase-in, we support 3b-2 which phases in reallocation evenly over the duration of the rebuilding plan.
- **Eric Summers (Recreational – MA):** I support 3a-2 and 3d-2

Rebuilding Plan

- **Eric Summers (Recreational – MA):** Is the target a real value? We have never been at the target since 1985. Is there something being done differently this time that will make it more likely that biomass will hit the target? I recommend we be cautious; the target may not be too high, the threshold could be too low. I support 4b to have the stock be rebuilt as soon as possible. Maybe make the threshold 75% of the target instead of 50%.
- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** I support 4b as it rebuilds the stock quickest. The other options are remarkably unpleasant, with a lower chance of success.
- **Mike Pierdinock (For-Hire – MA):** He remembers back in 1980s when bluefish were abundant, and this is not the same fishery today. Is the reduction in estimates of biomass due to the fact that less people are targeting bluefish because they have moved offshore?

- **Rick Bellavance (Priority Charters, Recreational/Commercial – RI):** Spawning stock biomass and recruitment looks to be fairly stable. I think the Council's risk policy has been vetted and is the appropriate alternative (4c). This alternative will get the job done, but won't overly burden the fisheries.
- **Steven Grust (Recreational – NJ):** Does the biomass graph account for unreported caught fish?
- **John LaFountain (Fox Seafood Inc., Commercial – RI):** We support 4b, along with many of the fishermen I have spoken to.

Sector Transfers

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** Earlier I pointed to the value of the catch and release aspect of the fishery. We feel the quota transfer provision is not reflective of the 65% of folks who practice catch and release in the fishery. Why practice catch and release if the unused quota is going to be transferred. The idea of catch release is to practice conservation in safe release practices so that there are fish tomorrow to catch. There is no benefit to the fishery if we transfer the fish and do not help them grow. We feel strongly that there should be no transfer at all in either direction. Given there are no options to that affect we support 5b-1 status quo in regard to the transfer cap.
- **Steven Grust (Recreational – NJ):** I support 5b-2.
- **John LaFountain (Fox Seafood Inc., Commercial – RI):** I support 5a-1 which will continue to allow quota going from the recreational to the commercial sector. It is important to support the commercial fishermen at the end of the season when the transfers typically occur.
- **Eric Summers (Recreational – MA):** I support no transfers.
- **Owen Baute (Recreational – RI):** I support no transfers. Catch and release is only worth it when the fish are going to stay there.

Management Uncertainty & De Minimis

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** We support 6b, the post-sector split. Seems to be the fairest alternative.

De Minimis

- **David Monti (Rhode Island Saltwater Anglers Association, Recreational):** We support 7e, the 2020 management measures.

2.5 NEW JERSEY

Thursday, April 8, 2021, 6:00 p.m.

Attendees: (37 excluding Council/Commission staff): Steven Avakian, Chris Batsavage, Bill Blanke, Bonnie Brady, Jeffrey Brust, Tony Campagna, Michael Celestino, Douglas Chase, Joe Cimino, Heather Corbett, John Dwyer, Jessica Daher, John DePersenaire, Michelle Duval, Cynthia Ferrio, Frank Florio, Thomas Fote, Paul Haertel, Ross Hartley, Stephen Hydock, Bob Keller, Tom Little, Wayne Maloney, Reel MaxLife, Steven Morey, Adam Nowalsky, Will Poston, Michael Purvin, Andrew Rigby, Lenny Rodriguez, Mark Taylor, John Toth, Mike Waine, Kevin Wark, Thomas Wayne, Harvey Yenkinson, Douglas Zemeckis,

Summary: The meeting started with an introduction and briefing from the hearing officer Joe Cimino. In total, six individuals offered comments on the amendment. Very few comments received at this hearing were in support of a specific alternative. The majority of the meeting was geared towards answering questions on the amendment and several suggestions were made that fall outside of the current range of alternatives.

Individuals offered several recommendations for the FMP goals and objectives including greater consideration of the following: the consumer user group; environmental stressors; the importance of forage fish; and differences in regional abundance. When asked about the commercial/recreational allocation alternatives, one individual voiced support for alternative 2a-1. No comments were provided on the state commercial allocations, but two commercial stakeholders said they thought the alternatives were too complex and expressed a preference to discuss the matter later offline with staff. On the subject of the rebuilding plan, three people thought that the stock is responding to environmental and ecological cues and that fishing mortality is not the cause for the stock's decline. Four people were in strong support of a ten-year rebuilding plan to give the stock adequate time to rebuild. In regard to the sector transfers, one person shared that they were never in support of this process and a second person said that they would prefer that no transfers occur until the recreational sector has a higher bag limit. Lastly, one person commented in support of sector specific management uncertainty (6b) and flexible recreational measures for *de minimis* states (7b).

Attendees asked several clarifying questions, a few of which are highlighted below. One person stated that prior to final action, the public will need clarification from NOAA Fisheries on what actually happens if adequate progress is not achieved during rebuilding. Another person asked about when transfers are allowed during the rebuilding plan. Staff explained that the newly proposed transfer process (5a-2), which would allow transfers during rebuilding so long as the stock was above the overfished threshold and overfishing is not occurring. Lastly, one person asked if a ten-year rebuilding plan could even be implemented if it was previously removed from the alternative set, to which a NJ commissioner responded that nothing is completely off the table until after final action.

Comments

FMP Goals and Objectives

- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** I see that the FMP goals and objectives reference fair and equitable access to user groups along the coast, but what about consumers?
- **Kevin Wark (Viking Village, Commercial - NJ):** Bluefish are suffering from great environmental issues. I have watched this my entire life. Moving up and offshore and they have

now dwindled to a small population. I feel a lot of this work is in vain. Until we can learn why recruitment is low, we are going to struggle. I think the objectives need to be more focused on the stressors in the environment that caused changes in the fishery. Why are bluefish swimming at 100 fathoms when they used to be just a few miles off the beach? Collectively, we need to open our eyes and look at what is happening in the environment. I don't believe this is an overfishing issue. These fish used to look like schools of menhaden.

- **Tom Fote (Board Member - NJ):** In 1989 we put a 10 fish bag limit in it was not due to stock status. A few years later the stock declined, but it was due to sand eel populations declining. In the 1960s through the 1980s bluefish were feeding heavily on sand eels. In the 1990s bluefish were no longer looking healthy and well fed because of warming waters and less bait. The fish go further offshore to be in colder waters. We know these issues are environmental and bluefish have gone through these cycles. We are at about the 75-year average population. Now, we changed the limits again and its due to stock status. I see that we are going to put a lot of commercial and recreational fishermen through unnecessary suffering, because we know that the stock depends on forage species, and forage species are moving because the water is warm.
- **John Toth (Jersey Coast Anglers Association):** Sand mining has destroyed habitat on the inshore waters. When you lose habitat, it is less attractive for all species. We are dealing with climate change here and also had hurricane Sandy destroy much of the inshore environment. This is one of the major reasons we are not seeing bluefish in our waters.
- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** On the eastern end of Long Island there has been some of the largest bluefish and most abundant schools we have seen in years. I know water temperature plays a role, but our experience has not been the same as the previous commentors.

<u>Commercial/Recreational Allocation</u>

- **John DePersenaire (Recreational Fishing Alliance - NJ):** Can you show a time series of recreational landings relative to the RHL?
- **Mike Waine (American Sportfishing Association - NC):** Do recreational landings include dead discards? Does the document have discard information within it?
- **Kevin Wark (Viking Village, Commercial - NJ):** I represent Viking Village, we have 34 vessels and we were huge bluefish producers for many years, until we saw bluefish shift to the east. The epicenter of bluefish fishing has been moving northward over the years. However, if the fish return, we want to be able to fish for them. We are looking for opportunities to continue fishing in the Mid-Atlantic and keeping the infrastructure alive. I am just curious of what the historical percentages are to ensure we have opportunities moving forward. It costs a lot of money to keep the doors open. I support 2a-1. This is all about opportunity for these vessels if the fish present themselves.
- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** Can you explain why the percentages change when we are using catch data?
- **Mike Waine (American Sportfishing Association - NC):** This bluefish fishery is absolutely different from the summer flounder, scup, and black sea bass fisheries in that catch-and-release fishing is a large component of the bluefish fishery.

Commercial Allocations to the States

- **Bonnie Brady (Long Island Commercial Fishermen's Association – NY):** This is a very complicated set of alternatives. Would it be possible to talk offline to better understand the management implications?
- **Kevin Wark (Viking Village, Commercial - NJ):** I agree with Bonnie. This is too confusing for me to make any comment right now. We need to know what this truly means for individual states especially when I am representing the commercial sector.

Rebuilding Plan

- **John DePersenaire (Recreational Fishing Alliance – NJ):** I previously asked about the absence of a 10-year rebuilding plan option. It was explained that the MSA requires that the stock be rebuilt as soon as possible, and it was determined that the 10-year option was not appropriate. I do think that this is a significant concern from our standpoint. This stock is responding more to environmental and ecological cues as opposed to directed fishing mortality. By not having the 10-year option, we are setting managers up for failure. We are putting the burden of unnecessary pain on the fishermen. Section 304e in MSA allows for going up to 10 years. I really think that the 10-year option should be included. I also think the SSB rebuilding target is actually unattainable knowing that we have never been at that level before.
- **Mike Waine (American Sportfishing Association - NC):** The public hearing document states "if adequate progress is not made through the rebuilding plan, the regional office will immediately make revisions necessary to achieve adequate progress. NOAA Fisheries technical guidance on MSA National Standard 1 recommends that in these situations the rebuilding fishing mortality proxy (F) be set at 75% of the target F. This means that if the selected rebuilding plan is demonstrating difficulty in achieving the target on time, F may be further decreased to achieve a rebuilt stock." Am I understanding correctly that if we do not rebuild on pace with the plan that we start lowering our target fishing mortality rate to 75% of the target to speed rebuilding? If this is the guidance, but we don't know for sure if that is what gets implemented, then that leaves quite a bit of uncertainty for the stakeholders. I continue to maintain that this is going to be a really frustrating moment if we are wrong about this ambitious timeline and MSA NS1 says we need to further constrain. There are many factors aside from fishing mortality that impact rebuilding. Prior to final action we will need clarification from NOAA Fisheries on what actually happens if we do not achieve adequate progress towards rebuilding.
- **Bonnie Brady (Long Island Commercial Fishermen's Association, NY):** There has to be a 10-year option. Midway through the rebuilding plan if new stock assessment information is made available and the research surveys are unable to catch bluefish, the quotas will be dropped and both fleets will be heavily restricted. Winter flounder was an interesting situation. In 2010 the NEFMC put a moratorium on winter flounder in southern New England because the trawl survey was unable to catch the fish and the assessment showed that there were no fish. The problem was that the net was about 6 inches off of the bottom and unable to catch flat fish. I highly recommend as a failsafe to have the ten-year option in the plan. If regionally there is an issue – tides, temperature, forage, EFH – the only people that are going to pay for it are the fishermen and you have to have the 10-year option as a buffer just in case.

- **John Toth (Jersey Coast Anglers Association):** The ten-year approach is the way to go. Right now, we are constrained to 3 fish. How much more can we do to help the stock? This is not a result of fishing mortality; this is an environmental issue and beyond our control. The last thing we need to do is to see the for-hire fleet go out of business. They are already struggling with low bag limits and the pandemic. Whatever we can do to help the for-hire fleet would be much appreciated.
- **Kevin Wark (Viking Village, Commercial - NJ):** Everyone on the call has been spot on. Bluefish are the next weakfish, where the bag limit is down to one and the species can't get a foothold back into the environment. We also used to have winter flounder in New Jersey and that fishery is almost nonexistent now. This adds to the long list of species we have lost. We need to be mindful of our infrastructure and provide the opportunities we can. We do not want our goals to be too high. I think bluefish are not going to be able to rebuild. We used to see them spawning inshore in the spring and summer and now we don't see that anymore in the Mid-Atlantic. This is the next grey trout – where nobody can pinpoint what happened. All the comments we have heard tonight are very good and accurate.
- **Mike Waine (American Sportfishing Association - NC):** When the Council and ASMFC developed this draft amendment, we asked them to keep the 10-year alternative in place. They removed it and we now can no longer have it added back in because it is outside of the current range of alternatives. Is that correct?
- **Tom Fote (Board Member, NJ):** Nothing is ever completely off the table. I have seen weirder things happen before. The real problem is looking at the public hearing attendance numbers. The small number of stakeholders do not represent the entire community. We used to have hearings with 100s of people. People are webinar-ed out. We are not getting enough public input.
- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** I agree with Tom and think there is a fair amount of burnout from all the meetings we have had. If there was a way to add a few more types of public hearings, that could be very beneficial. I think people need a break and it has pretty much been non-stop for weeks. It would be helpful to ask Bob and Chris to see if additional hearings could be scheduled.

<u>Sector Transfers</u>

- **John DePersenaire (Recreational Fishing Alliance – NJ):** The recreational sector needs reasonable bag limits to entice people to pursue bluefish. We need that incentive. I would surmise that directed trips are down, just because of their change in distribution. Bluefish are very far offshore, and less people are targeting them. In fact, many of the bluefish fishing tournaments that would usually happen during the springtime in New Jersey have shut down. I have a hard time supporting transfers to the commercial sector until reasonable bag limits are restored. I am not opposed to transfers to the commercial side in general, just not until reasonable recreational measures are restored that incentive people to go on a head boat or steam 20 miles offshore to catch them.
- **Kevin Wark (Viking Village, Commercial - NJ):** I spoke against this quota transfer so many years ago when it was first implemented because I knew the day would come that it would no longer be feasible. We can't expect the recreational sector to transfer fish to the commercial sector. Many years ago, I spoke against this system where unused fish would be transferred

away. Back then, accounting was not very accurate for either sector, which made transfers an even bigger problem in his view. This was never a good system and I hope we have all learned from this. Transfers hasn't been a huge issue lately because the commercial sector hasn't been landing all their quota but moving forward, I do not see it likely that the recreational sector would transfer over fish. I do not see transfers working as an option moving forward.

- **Bonnie Brady (Long Island Commercial Fishermen's Association - NY):** When are transfers allowed and not allowed in regards to stock status and the rebuilding plan?

Management Uncertainty

- **John DePersenaire (Recreational Fishing Alliance – NJ):** We would support 6b. This position is consistent with the position we have taken for the recent summer flounder, scup, and black sea bass allocation amendment. There is value added to the catch-and-release component of the bluefish fishery. I think it is best to not share uncertainties across sectors. We need to revisit how we estimate average weight of discarded fish.
- **Mike Waine (American Sportfishing Association - NC):** It seems that switching to sector specific management uncertainty will just penalize the recreational sector for uncertainty associated MRIP estimates. The recreational reform initiative has been working to develop tools to better use MRIP data and for management to account for its inherent uncertainty. There is an effort to potentially base recreational measures on stock status. I wanted to provide greater context around this issue when these decisions are being made.

De Minimis

- **John DePersenaire (Recreational Fishing Alliance – NJ):** We would support 7b. I really do not think the impacts of fishing in a de minimis state are going to have any measurable impacts on the stock during rebuilding. Let those states take full advantage of any bluefish. In the broader scheme of things, de minims states will have a very small impact.

3 WRITTEN COMMENTS

3.1 ONLINE COMMENT FORM

Steven Schnebly

Email

smddfish@gmail.com

1. FMP Goals and Objectives

Weakfish, flounder, fluke, striped bass, kingfish, blowfish, cod, mackeral. All a fraction of what they once were.

What do you guys do again?

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New York

Gear type(s) used

Hook and line or handline

Date Submitted

02/20/2021

George Horvath

Email

georgerhorvath@yahoo.com

8. General Comments

I tagged 2,397 bluefish in NJ with American Littoral Society spaghetti tags. 29 were recaptured from the Cape Cod Canal to Atlantic Beach, NC. Last year I tagged 89 bluefish in Manasquan Inlet, and one was recaptured in the Point Pleasant Canal.

Upload File

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How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Jersey

Gear type(s) used

Hook and line or handline

Date Submitted

02/22/2021

Aaron Uehara

Email

aaron.uehara@gmail.com

8. General Comments

Blue fish are disappearing. Drop the commercial quotas, populations are not what they were 20 years ago. You need to give them a chance to recover.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

02/23/2021

David Walt

Email

dwalt@bwh.harvard.edu

1. FMP Goals and Objectives

Something drastic needs to be done. I am a recreational fisherman on Cape Ann. I haven't caught a bluefish in two years.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

02/23/2021

Alan Anderson

Email

alanblackpowderstuffer@gmail.com

1. FMP Goals and Objectives

I believe that commercial fishing quotas on Striped Bass and Bluefish should be halved, or even a 2 year ban on commercial fishing for these species, to allow stocks to rebuild. As a recreational fisherman. I have not seen a bluefish, or caught a striped bass for many years, i believe, due to commercial over-harvesting by commercial fishers.

Primary state(s) you land bluefish in:

Massachusetts

Date Submitted

02/24/2021

Michael Toole

Email

toolemf@hotmail.com

1. FMP Goals and Objectives

Objective 1.1 should clearly state maintain catch below Acceptable Biological Catch rather than "rate of fishing mortality".

Objective 2.2. should be deleted. This is commonly used as an excuse for not taking needed actions for the best protection of the fish. While this is something I think should play in the allocation of catch between user groups but not for weakening needed restrictions on catch numbers. Example being giving party/charter 5 fish limit verse others 3 fish. Both should have been 3.

2. Sector (Commercial/Recreational) Allocations

Support 2a-2 89% Rec, 11% Commercial. I support this because I believe both the economic and social value of bluefish are much greater in recreational fishing.

Support 2b-1 No phase-in. I support this because with the current status of the bluefish stock this change should be immediate.

3. Commercial Allocations to the States

Support 3a-4 Half 1981-1989 and half 2009-2018. I support this because it recognizes historic landing before the stock level dropped so low that states like NH and Maine have seen very few bluefish while also recognizing we will not reach the level seen in the 80s.

Support 3b-2 allocation change spread evenly over same duration as rebuild plan. I support this sine no reason to increase allocations to states that have limited access to them until stock is rebuilt.

4. Rebuilding Plan

Support 4b Constant harvest - 4-year rebuild plan. I support this because I think it is the most likely to succeed in rebuilding the stock with less risk. Since the stock is already over fished more drastic action is required.

5. Transfers

No transfer until stock levels reach target level, than 5a and 5b.

6. Management Uncertainty

Support 6b Post-sector split. Allows addressing differences between commercial and recreational fishing uncertainty.

7. De Minimis Provisions

Support 7c Recreational De Minimis - state selected management measures. I support this because it allows states to develop regulations that fit their need while maintaining less than 1% harvest threshold.

8. General Comments

For the recreational catch there should be no differences between for hire industry and individual recreational fishing limits.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Hampshire, Massachusetts, Rhode Island, New Jersey

Gear type(s) used

Hook and line or handline

Date Submitted

02/24/2021

MATTHEW QUAIL

Email

matthewquail@gmail.com

1. FMP Goals and Objectives

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

2. Sector (Commercial/Recreational) Allocations

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

4. Rebuilding Plan

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

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6. Management Uncertainty

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

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Forwarding this to hopefully influence any decisions on bluefish catch limits

8. General Comments

MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment

I fish Salem Sound often. I have not seen any bluefish in the Salem Sound area for 4+ years. Not sure if this is a migration nuance or an indicator of the health of the biomass.

Forwarding this to hopefully influence any decisions on bluefish catch limits

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

03/03/2021

Dean Pesante

Email

dpesante@cox.net

1. FMP Goals and Objectives

The Bluefish stocks/fishery are very healthy here in Rhode Island. It is our primary fishery. Many fisherman and related businesses rely on it. We could not stay in business without it. Which ever management plan will allow us to continue making a living and provide for our families is the plan we would support.

2. Sector (Commercial/Recreational) Allocations

We support 2a-1: 83% Rec, !7% Comm (status quo)
We 2b-1: No phase in (status quo) from these alternatives.
We would like to see it return to 75% Rec, 25% Comm. as in past years. Not sure how they came up with the %/numbers given the fact that all recreational landings are voluntary and can be easily inflated and inaccurate.

3. Commercial Allocations to the States

We support Alt. 3a-2: 5 year (2014-2018) This reflects the most current trend/data. 2019 and 2020 would also support this.
We support 3b-1: No phase in (status quo) Our fishery is healthy here in Rhode Island. We can't afford any reductions.
We support 3c-1 No Trigger (status quo)
WE support 3d-2 0.10% Minimum Default Allocation

4. Rebuilding Plan

We support 4b Constant harvest - 4 year rebuilding plan

5. Transfers

We support 5a-1 No Action/Status QUO
We support 5b-1 No Action/Status Quo

6. Management Uncertainty

We support 6b Post-Sector Split

7. De Minimis Provisions

We support 7d Recreational De Minimis-rollover management measures

8. General Comments

The Bluefish stocks and fishery in Rhode Island is healthy. We have always had an abundance of Bluefish in our waters and this is still true at the present time.
I'm not sure why Bluefish landings have dropped off in the states to the south. Possibly water temperature or water quality do to run off from rivers and estuaries with fertilizers, pesticides and other pollutants. Also Beach Renovation (dredging) are all possibilities that may keep Bluefish away. Possibly further offshore waters.
I hope the appropriate changes can be made to reflect the CURRENT Bluefish trends when managing this resource and accommodate those who rely on this fishery. Than you.
Respectfully. Dean Pesante F/V Oceana

How would you describe your primary role in the fishery?

Commercial

Primary state(s) you land bluefish in:

Rhode Island

Gear type(s) used

Gillnet

Date Submitted

03/05/2021

Corey Gammill

Email

cmgammill@gmail.com

1. FMP Goals and Objectives

I like the proposed goals to the FMP. The question I have, and this will be a theme of this document is how can ASMFC and NMFS stay with their finger on the pulse of what is happening.

The goal is simple: a fishery that is sustainable and enjoyed by ALL user groups.

I just think it is VERY important for regulators to understand why they failed in managing the fishery? The goals originally are good goals as well, but the bluefish bag limit was 10 fish per person for days for a VERY long time and no changes were made and not enough questions asked about whether measurement was correct?

2. Sector (Commercial/Recreational) Allocations

Bluefish and Striped Bass are the two key fish for the recreational fishery from Florida to Maine. These two fish get people on the water, using their boats, using fuel, buying bait, buying fishing gear. While I am incredibly supportive of commercial fishermen, Bluefish have very little value in price per pound and have much more value to recreational fishermen and the businesses that support them. I vote 2a-2

3. Commercial Allocations to the States

Status quo or 3a-4...
3b-2
3c-1
3D-3

4. Rebuilding Plan

4B: For starters, I am very skeptical that the changes in bag limit alone in 2020 will lower the catch rate by 2/3rds. I don't know anyone who keeps 3 fish, so I don't see how lowering the bag limit will make a difference, but we will see. I wish the council had created a minimum size and had restricted treble hooks. I also wish the council would manage the fishery recognizing that the more bait we have the more fish we will have. This was seen clearly in the summer of 2020. This was the best bluefihsing we have seen for LARGE fish and it is no coincidence that the commercial fishermen were not fishing for squid as there was no market.

The real cause of less bluefish in coastal waters is less bait and the fish we have have, have gotten smaller because most of the big bait is sitting offshore with the bigger bluefish. So what this means is the smaller fish come in and these are the bluefish that are targeted.

If you look at catch data over the last 5 years bluefish harvest size has gotten smaller as less big fish exist. It has been proven that the smaller the bluefish the higher the release mortality rate is. So the irony is that as we let our fishery fall apart we are only hurting it more because the release mortality rate increases.

How can we solve all this?
1) Minimum sizes. Let the fish grow and have a chance to reproduce. No one should keep a fish smaller than 3 pounds.
2) Adjust gear types: no treble hooks and no J hooks with bait.... Any sign of blood severly decreases a fishes chance of survival and both lead to more gut/gill hooks and multiple hooks.
3) Have closures to commercial bait fishermen when Migratory fish are present. For instance off Nantucket in the summer limit the squid fishermen and you will see the big fish inshore, reproducing inshore. *** I am sure this is true up and down the coastline...

LASTLY, the reason I think we should do 4B is that if we can rebuild the fishery slowly or quickly, why wouldn't we do it quickly? At least if we do it quickly we can see whatis working and not, where if we take our time, it will take us longer to assess results, potentially pushing our fishery further into decline.

5. Transfers

No ACTION: Statust quo....

We do not currently collect data well enough to know what is happening right now with a fishery, so how can we expect to make educated decisions about Data Transfer if we don't have real time data? If we had more accurate data, I would say absolutely, but without it we would be making decisions on information from 1.5 years ago...

6. Management Uncertainty

While every part of me wants 6B, because I do think that the two should be separated as data is much easier gathered from the commercial fishermen than the recreational. If there is uncertainty about the recreational side, the commercial fishermen should not be penalized while regulators dig into where the issue is, and visa versa

This said, if uncertainty is HURTING the WHOLE FISHERY, decision makers need to act a lot more aggressively than they have in the past. It is easier to open a fishery than to rebuild it right? It is amazing how conservative ASMFC is being towards rebuilding the fishery. I think that any sign of overfishing should lead to aggressive management and rule changes.

So my vote would be 6A

7. De Minimis Provisions

No comment

8. General Comments

Below I am including a public comment submitted in 2020.

I want it noted again that I do not think the regulation changes in 2020 were strong enough to make a change in our fishery.

We need to do more than adjust the bag limit to make a difference in rebuilding the stock.

I also think that ASMFC and NMFC need to seriously consider ways to reduce the release mortality rate. In the study used to come up with the assumed 15% rate it is made VERY CLEAR that the presence of blood decreases the likelihood of survival by 9-11 times. If we could lower poor hookings this would make a monumental difference in survival rate of fish and lower the 15% assumed rate significantly. I firmly believe that eliminating treble hooks are a key to reducing this mortality rate and I highly suggest the council start a study to see if this is the case.

It is also very clear that the larger the fish targeted, the less likely that they will die. So with this information why is the ASMFC and NMFC encouraging targeting of small fish with no minimum size. Minimum size should be required.

Lastly, ASMFC should be looking at the vertical nature of an eco system. 2020 was the best blue fishing that Nantucket has seen in the last 5 years for large fish. This was NOT because of a smaller bag limit started in April 2020, but because of a lack of Squid boats south of Nantucket and the Vineyard. Limiting pressure on bait, led to more herring and squid in our waters, which brought back the LARGE bluefish. So a question that should be asked is WHETHER RECREATIONAL BLUEFISH ARE MORE VALUABLE THAN COMMERCIAL SQUID THIS IS KEY!!!!

WE HAVE DATA THAT SHOWS THAT MORE BAIT = MORE FISH. SO WHY CAN'T WE MANAGE FISHERIES AT THE SAME TIME? If the squid boats were moved 12 miles off and the bait had a chance to get in, than the commercial fishermen would still catch their squid, albeit with a bit more effort, but a recreational fishery for 3 months around Nantucket, Martha's Vineyard and Cape Cod would be brought back. if this model were followed up and down the coast and comparisons made between bait fisheries and fin fish fisheries, I think ASMFC would find some different answers to how the bait fisheries should be managed.

Upload File

bluefishcomment2021.docx

How would you describe your primary role in the fishery?
Recreational (for-hire)

Primary state(s) you land bluefish in:
Massachusetts

Gear type(s) used
Hook and line or handline

Date Submitted
03/08/2021

Jeff Norton

Email
jeffnrtn@yahoo.com

1. FMP Goals and Objectives
Make all NE states have the same regulations for all fish. For blues make it 1 fish per day per angler. Not sure what the size should be or if a slot limit works for blue fish.
10 per day was way too many and even 3 is too many. Thank you.

Haven't seen a striper public comment box like this but they should shut it down altogether for a couple seasons. OR ban commercial fishing and fishing in the cape cod canal

How would you describe your primary role in the fishery?
Recreational (private angler)

Primary state(s) you land bluefish in:
Massachusetts

Gear type(s) used
Hook and line or handline

Date Submitted
03/11/2021

Ray West

Email
rrrwest@yahoo.com

2. Sector (Commercial/Recreational) Allocations
I recommend
2a-3 87% Rec, 13% Comm

4. Rebuilding Plan
recommend
4b Constant harvest – 4-year Rebuilding Plan

5. Transfers
no action

8. General Comments
please manage for abundance

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts, Rhode Island

Gear type(s) used

Hook and line or handline

Date Submitted

03/11/2021

Dave Surdel

Email

dsurdel@wiley.com

8. General Comments

The fisheries management council needs to act quickly and aggressively to halt the decline of our Bluefish population and restore an abundant fishery. As I recreational angler that travels all over New England from Cape Ann to Montauk, I have witnessed the bluefish population crashing over the last 10 years. It has reached the point where the inshore recreational bluefish opportunity is nearly nonexistent. Long gone are the days when we could expect thousands of bluefish to be patrolling their traditional strongholds from Cotuit to Monomoy and Sankaty to Montauk. This fishery ran like clockwork for the better part of 20 years. But the bluefish are not there anymore. You can hardly find them in a boat, much less fishing from shore. The bluefish are gone and the commercial fleet that helped wipe them out has gone away. The years and years of greed and 'recremercial' charter captains wiping out the inshore fishery coupled with overly generous (and widely unenforced) bag limits have decimated our population. My friends used to brag about how many pounds of bluefish they could fill the boat with and still make it back to the ramp from Nantucket. Now the fishery is so decimated, it's hardly worth the trip.

The burden of responsibility for this mismanagement falls on the fishery councils. It's clear that councils have failed to maintain a healthy fishery. It's a pity it has come to this, particularly given the dire straits the Striped Bass are in for the exact same reasons: complete stock mismanagement coastwide, bickering between states over resource-grab and prioritizing a small special interest group of commercial and charter captains to the detriment of the overall resource. Too little action is being taken, too late. Please stop micromanaging the statistics, debating percentages, and rolling out stop-gap measures. Everyone can see through that at this point. Trivial changes make little impact. The fisheries councils need to take drastic measures to protect our bluefish stock before it's too late. If that means stopping commercial fishing and implementing a recreational moratorium, please do it. Commercial opportunity goes beyond a handful of commercial fisherman. It also impacts coastal communities through declining charter business. Fisherman that once that once traveled to Cape Cod to have fun, stay in our hotels and eat at our restaurants are disappearing quickly.

Please do the right thing and take immediate action to stop the overfishing by all sectors and restore this once-abundant fishery to it's former glory.

Thanks, Dave Surdel

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts, Rhode Island, Connecticut, New York

Gear type(s) used

Hook and line or handline

Date Submitted

03/12/2021

Andreas Sofronas

Email

asofronas@students.stonehill.edu

1. FMP Goals and Objectives

I think that there should be more regulations for bluefish. Over the past few years bluefish have not arrived in the numbers that they have historically. They have not arrived in June and July when they are supposed to, rather they are showing up in my area in August and don't stay very long. When they did arrive, we didn't catch many of them but they are are very fun fish to catch and pound for pound I think they put up a better fight then bass do. People will take the full bag limit of blues when they do not need all of that bluefish. I think that bluefish deserve just as much respect as bass do and should have similar regulations as the striped bass.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

03/17/2021

Josh Tanz

Email

jbtanz@gmail.com

2. Sector (Commercial/Recreational) Allocations

I am in support of reduced commercial limits and stricter recreational limits as well (size limits and bag limits) and for immediate implementation of any changes.

8. General Comments

Bluefish have been over-harvested and overfished. The goal should be reduced harvesting and stricter recreational rules implemented immediately in order to increase and then maintain bluefish populations at the highest levels possible

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New York

Gear type(s) used

Hook and line or handline

Date Submitted

03/23/2021

Thomas Fuda

Email

tom.fuda@gmail.com

1. FMP Goals and Objectives

Regarding proposed goals 1.2 and 2.1, 2.2: I feel the term "discard mortality" is somewhat misused at times. It basically sounds like it is not taking into consideration the fact there is a fairly large segment of the recreational sector that often catches and intentionally releases Bluefish as sport, and not in response to any regulation that mandates "discarding" the fish. Participants in this mode of fishing often have no intention of keeping fish, but rather they see value in the experiencing the thrill of catching the one of the most aggressive and strongest fish, on a pound per pound basis. I'm all in favor of promoting better handling to reduce "release mortality", but let's not underestimate the value these anglers place on the experience of fishing for Bluefish, nor the economic benefit seen by the money this sector spends. So, when crafting goals that seek to reduce release mortaility, we don't reduce access to this sector of the recreational fishery.

2. Sector (Commercial/Recreational) Allocations

I am in favor of the status quo option (2a-1) regarding commercial / recreational allocation.

4. Rebuilding Plan

Regarding the Rebuilding Plan: I am in favor of option 4c (5-year rebuilding plan). I feel this offers the best compromise between rebuilding the stock quickly, while reducing the socioeconomic impact to the commercial fishery and fishing communities.

5. Transfers

Regarding Sector Transfers: I am in favor of option 5a-1 (status quo). I'm more concerned with rebuilding the stock to abundant levels than I am with making unused commercial allocation available for recreational harvest.

6. Management Uncertainty

Regarding Management Uncertainty: I am in favor of option 6b (Post-sector split). I feel this provides for a more equitable application of management uncertainty.

7. De Minimis Provisions

Regarding De Minimis Provisions: I am in favor of option 7e (2020 management measures). This option provides for consistent coast-wide regulations.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Connecticut

Gear type(s) used

Hook and line or handline

Date Submitted

03/29/2021

Craig Eldredge

Email

bubbaboards@bellsouth.net

2. Sector (Commercial/Recreational) Allocations

As a recreational fisherman I would like you to reconsider the 3 fish limit to exclude snapper blues from the limit . Maybe a slot size is a better alternative.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

03/30/2021

David Cannistraro

Email

fastboat01@yahoo.com

1. FMP Goals and Objectives

Stop the commercial fishery. They decimate whole schools of Bluefish.
The recreational fishery adds much more to the economy without destroying the gene pool.

Primary state(s) you land bluefish in:

Massachusetts

Date Submitted

03/31/2021

James Molinaro

Email

jim.m1@verizon.net

1. FMP Goals and Objectives

I would like to support 2a-5 for shore anglers and charter boats .

2. Sector (Commercial/Recreational) Allocations

I support 3a-3 !

3. Commercial Allocations to the States

3D-3

4. Rebuilding Plan

4d

5. Transfers

5b-1

6. Management Uncertainty

6b

7. De Minimis Provisions

7b

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Jersey, Delaware, Virginia, North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/01/2021

Preston Southwick

Email

prsouthwick123@yahoo.com

3. Commercial Allocations to the States

netting must be banned for the health of all species that call our United States waters home. It is an indiscriminate harvesting method that has no way of limiting bycatch.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Jersey

Gear type(s) used

Hook and line or handline

Date Submitted

04/01/2021

William Doan

Email

doanbill@aol.com

1. FMP Goals and Objectives

Bluefish have been overfished. Both recreational and commercial fishing share the blame. I saw too many people keeping bluefish that they had no intention of eating. The former 15 fish limit really hurt their population. Bluefish are harder to find now and larger ones are harder to find as well. I release all bluefish I catch to try to help the population rebuild.

2. Sector (Commercial/Recreational) Allocations

I favor the the 2a-2 option.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Jersey

Gear type(s) used
Hook and line or handline
Date Submitted
04/03/2021

Paul Tokarz

Email
tok67@verizon.net
1. FMP Goals and Objectives
Needs to be revised
2. Sector (Commercial/Recreational) Allocations
I would rather see the 5 year closure. To rebuild the stock.
3. Commercial Allocations to the States
3A
4. Rebuilding Plan
4CC
5. Transfers
Closure
6. Management Uncertainty
Closure
7. De Minimis Provisions
7E
8. General Comments
Closure for 5 years
How would you describe your primary role in the fishery?
Other
Primary state(s) you land bluefish in:
Massachusetts
Gear type(s) used
Hook and line or handline
Date Submitted
04/04/2021

Daniel Lester

Email
dannylester@optonline.net
1. FMP Goals and Objectives
Status quo
2. Sector (Commercial/Recreational) Allocations
2a-1 status quo
3. Commercial Allocations to the States
New york should get more quota.

4. Rebuilding Plan

Status quo

5. Transfers

Status quo

6. Management Uncertainty

Status quo

7. De Minimis Provisions

Status quo

How would you describe your primary role in the fishery?

Commercial

Primary state(s) you land bluefish in:

New York

Gear type(s) used

Pound net

Date Submitted

04/07/2021

GRACE JORGE

Email

gracemjorge@aol.com

1. FMP Goals and Objectives

REFER TO GENERAL COMMENT

2. Sector (Commercial/Recreational) Allocations

REFER TO GENERAL COMMENT

3. Commercial Allocations to the States

REFER TO GENERAL COMMENT

4. Rebuilding Plan

REFER TO GENERAL COMMENT

5. Transfers

REFER TO GENERAL COMMENT

6. Management Uncertainty

REFER TO GENERAL COMMENT

7. De Minimis Provisions

REFER TO GENERAL COMMENT

8. General Comments

FORGIVE THE LACK OF FINESS OR POLITICALLY CORRECTNESS MUMBO-JUMBO! THE JERSEY SHORE SUFFERS A SERIOUS INFLUX OF OUT-OF-STATE RESIDENTS, WHICH SERIOUSLY TOLLS THE LIMITS OF RECREATIONAL CAPTURE. SUPPORT STATE RESIDENTS LIKE THEY SUPPORT YOU, AND IMPOSE THE SNAPPER LIMIT OF 3 PER PERSON ON OUTSIDERS...& INCREASE THE RCL FOR RESIDENTS FROM 3 TO 4 ON BLUEFISH (AVERAGE HOME HAS COUPLE & 2 CHILDREN), 3 TO 15 ON SNAPPERS & MANDATORY REGISTRY PROGRAM WHERE ADDRESS ON REGISTRATION CARD MATCHES A GVT ISSUED PICTURED ID! TIRED OF PAYING FOR THE BRAINLESS ACTS OF OTHERS AND BE LUMP-SUMMED WITH COMMERCIAL

BUSINESS, WHEN MOST OF US ARE NOT FISHING DURING THE WEEK OR EVEN ABLE TO FISH EVERY WEEKEND! YOU WILL NEVER CONVINCE ME THAT RECREATIONAL FISHING AND NJ RESIDENTS ARE THE PROBLEM AND SOMEONE SHOULD CONSIDER OUTSIDERS THAT COME HINDER OUR SHORT-SPAN SUMMER FUN, ESPECIALLY WHEN A SPECIES SUCH AS SNAPPERS IS AVAILABLE FOR SUCH A SHORT WINDOW.

ALTERNATIVE: MAKE REGISTRATION MANDATORY FOR A FEE, DOUBLE THE FEE FOR NON-RESIDENTS & PUT A STOCK FISHERY TO WORK...CREATES JOBS, MAINTAINS FUN AND KEEPS EVERYONE HAPPY!!!

GIVE INSTEAD OF TAKE...MAKE JOBS INSTEAD OF ROBBING US ALL THE FUN WHEN WEATHER AND WORK PERMITS US TO SPEND A COUPLE OF HOURS OF FUN AWAY FROM JOB AND HOME!

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Jersey

Gear type(s) used

Hook and line or handline

Date Submitted

04/09/2021

Michael Rapoza

Email

rapdiver@comcast.net

8. General Comments

As usual the marine fishery council has failed to act in a timely fashion and another valuable(bluefish) resource is on the verge of collapse.
Commercial fishery is always put first and money is the motivation.As an avid recreational fisherman I see lack of real oversight by the council.
Striped bass ,tautog, and Squetague were once abundant and now have become a shadow of what they once were.
The council needs to have a backbone and regulate our Commercial and recreational fisheries in a sustainable way

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Massachusetts, Rhode Island

Gear type(s) used

Hook and line or handline

Date Submitted

04/17/2021

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jean publiee

Email

jeanpublic1@gmail.com

1. FMP Goals and Objectives

again this agency has failed to protect the fish stocks by being captured by the commercial fishing industryl too many reps are on these councils from fishing councils when it should be populated by environmental representatives. the commercial fishing industry has a philosophy of take it all immediately and they sneak and take more than any quotas that this agency give them. they lie to take more as well. all quotas in this species should be cut by 75% to the commercial fising industry. they are the ones who are stealing the fish. this comment is for the public rcord. the focus shoudl be on sustainability, not rape the oceans so that nothing lives there anymore

2. Sector (Commercial/Recreational) Allocations

all above shoudl be cut by 75%

3. Commercial Allocations to the States

all allocations shoudl be cut by 75% immediately

4. Rebuilding Plan

shut down all harvest of this species. all harvest shoudl be shut down. that is the best plan

5. Transfers

i see no reason for any transfers from any other site

6. Management Uncertainty

this agency needs change within itself. the focus on members from teh commercial fishindustry is seriously prejudicing this agency in its deliberations and pronouncements. certainly action to cut takings and harvesting is immediately needed and necessary

7. De Minimis Provisions

management measures -the only ones i want are the ones i propose

8. General Comments

cut all takings and harvest

How would you describe your primary role in the fishery?

Other

Primary state(s) you land bluefish in:

New Jersey

Gear type(s) used

Pound net

Date Submitted

04/19/2021

Richard Allebach

Email

rsallebach@verizon.net

2. Sector (Commercial/Recreational) Allocations

Any allocation changes need to directed toward the idea that the current plan is not working and what can be done to bring about the most improvement the fastest while still being fair to both parties.

4. Rebuilding Plan

I think that the plan should be geared more to catch and release of bluefish than it has been because the resource has been abused by many "recreational " fishermen.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/20/2021

Robert Pride

Email

bobpride@gmail.com

1. FMP Goals and Objectives

Support proposed objectives.

2. Sector (Commercial/Recreational) Allocations

Support 2a-2 89% rec, 11% comm - Better reflects recent fishery dynamics
Support Phase in option 2b-2 - minimize commercial impact over time

3. Commercial Allocations to the States

Support
3a-4 - rewards states with new entrants but give credit for long time players who developed the fishery
3b-2 - works to minimize impacts over time
3c-2 - no additional reward for recreational transfer
3d-3 - (reduce dead discards for incidental bycatch)

4. Rebuilding Plan

Support 4d - minimizes commercial impacts and allows time for participants to adapt and build better business strategies

5. Transfers

5a-2 - Why not?
5b-2 - seems more conservative for protecting windfall harvest and market gluts

6. Management Uncertainty

6b - less sector impact for both sectors

7. De Minimis Provisions

7e - consistent for all states, easier to implement and manage for the states

8. General Comments

Thank you for considering economic and social impacts that led to the longer phase in options. The biggest complaint from fishermen in all sectors (other than the general grumble about allocations and restrictions) is inconsistent rules from year to year. Perhaps a longer phase in period for changes will minimize year to year changes.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Virginia

Gear type(s) used

Hook and line or handline

Date Submitted

04/20/2021

Tim Stroud

Email

timstroud@yahoo.com

1. FMP Goals and Objectives

I propose a 12" minimum size limit with a 6 fish creel limit for recreational fishermen. Most people consider bluefish to be trash fish and do not keep them.

2. Sector (Commercial/Recreational) Allocations

Currently, the 3 fish per day for rec, and 800 pound per day for commercial is inequitable. Gill netting should be banned as gill nets target all marine fishes, mammals, and reptiles indiscriminately. If a gill netter catches 1600 of bluefish, or any other regulated fish, they must discard the overages and waste 800 pounds of dead or dying fish.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/20/2021

John Redmond

Email

jredm10204@aol.com

1. FMP Goals and Objectives

Until North Carolina stops all shrimp trawls in the inshore waters.Nothing you do will help any fish recover and you all know it.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/20/2021

Stephen Hickman

Email

bigsteve1998@yahoo.com

2. Sector (Commercial/Recreational) Allocations

There definitely does not need to be a shift in the allocations. The commercial sector does not need less than the 17% than they are getting. Taking any away will have a negative impact in NC.

4. Rebuilding Plan

There needs to be no action taken. Bluefish are abundant and most of the time its hard to avoid them while trying to catch other species of fish.

8. General Comments

This statement in the proposal is about the most asinine thing I've ever read.

" Relative to the status quo alternative, alternative 2a-2 would have positive impacts for recreational user groups, and in particular for those groups in communities that are highly engaged in and reliant upon recreational fisheries. The top fifteen communities in recreational fishing engagement and reliance are displayed in Figure 9 and Figure 11. Please note that the recreational fishing engagement and reliance scores are not bluefish specific, the metrics were based off of fishing engagement and reliance for all recreational species. For a more thorough introduction of community fishing engagement and social vulnerability indicators please reference Appendix A. These communities are likely to benefit from Alternative 2a-2, but some may see greater positive social impacts based on relative social vulnerabilities and reliance on the recreational industry. Communities in NC in particularly, such as Topsail Beach, Hatteras, and throughout the Outer Banks, have high reliance on recreational fisheries while at the same time moderate to high poverty, labor force vulnerability, and housing vulnerability. Increasing recreational allocations for bluefish could improve economic opportunities and result in positive social outcomes for these communities in particular. "

Apparently you don't realize the people you are talking about living in poverty are the commercial fisherman whom the government is trying to regulate out of business with the help of the CCA. The CCA sends me at least 2 emails a week with their objectives with one of the latest trying to ban all nets in the sound with a ballot referendum. Yes these communities rely a lot on recreational fishing but giving the recreational industry more quota will not improve the economic opportunities and positive social outcomes. I know this because I've called Hatteras home for my entire life. Taking fish away from the people who need it the most is not the answer. Prioritizing someone's fun over someone trying to make a living and reprehensible. The tackle shops and guides are doing great with the way things are now, there is no need for any change.

How would you describe your primary role in the fishery?

Other

Primary state(s) you land bluefish in:

North Carolina

Date Submitted

04/21/2021

Christopher Hickman

Email

bouttimefishing@yahoo.com

2. Sector (Commercial/Recreational) Allocations

I believe that 2a-1 should stay in place until the recreational sector is brought into compliance because they go over their quota every year..

3. Commercial Allocations to the States

I believe the allocations to the states should stay the same until the recreational sector is brought into compliance with their quota. We can't reallocate until the recreational sector stops catching over their quota.

4. Rebuilding Plan

4a is the recommended action until both sector can be brought into compliance with the quota.

5. Transfers

5a-1 is recommended as it seems to be working as it should.

6. Management Uncertainty

Keep with the status quo.

7. De Minimis Provisions

Status quo.

Date Submitted

04/21/2021

Carroll Clayton

Email

carrollc@esinc.net

1. FMP Goals and Objectives

As a 35 year veteran recreational surf fisherman, I appreciate this action you are taking to bring back the bluefish population. I watched the opportunity to catch bluefish decline significantly once they started appearing on restaurant menus and heard they were being harvested commercially. We all face the situation where the ocean cannot support mankind's desire for a larger amount of all fish.

2. Sector (Commercial/Recreational) Allocations

Obviously status quo is not working. The percentages are pretty even.
I like 2b-2

4. Rebuilding Plan

I support the 4-b plan.

5. Transfers

I support 5a-1

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/22/2021

Scot Calitri

Email

smcalitri@gmail.com

1. FMP Goals and Objectives

I support alternative 1A, but we need to look at Optimum Yield rather than Maximum Sustainable Yield. Maximum Sustainable Yield brings us on the razor's edge of failure and especially with a fishery with a heavy non-commercial element, the economic elements outside of "selling meat" are better represented by Optimum Yield.

2. Sector (Commercial/Recreational) Allocations

I support Alternative 2a-4 as we need immediate action and to best represent the baseline years most advantageous to the fishery!

3. Commercial Allocations to the States

I can't pretend to understand all of this, but we need to manage in favor of the fish. The Bluefish is not fueling anyone's full time commercial salary.

4. Rebuilding Plan

I support Alternative 4c, which is based on the Council's risk policy and projected to rebuild the stock within five years.

5. Transfers

Transfers are never good for the fishery. Transfers should not be allowed under the Bluefish Management / Rebuilding Plan.

6. Management Uncertainty

I support 6b as we need to protect this fishery and the economic value that the recreational sector produces. In all cases, a recreational fish is much more valuable than a commercial table fish.

7. De Minimis Provisions

7a needs to be the option as conservation equivalency cannot game this fishery too. Think and speak for the fish, not for those looking to cheat the system or find loopholes.

8. General Comments

Here's a great opportunity to speak for the fish is a less heated situation. Bluefish is not the key to any commercial incomes. Let's give them a chance and aggressively rebuild the stock.

A sincere thank you to those working to provide us with a sustainable, abundant stock. This is not easy work, but know that doing the right thing for the fish is always the way to lean. We're ruining so much as a species, Bluefish and other nearshore species are truly in our control to save.

The Bluefish need us.

Thank You.

How would you describe your primary role in the fishery?

Recreational (for-hire)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

04/22/2021

Andrew Bosco

Email

ndrwbosco@gmail.com

1. FMP Goals and Objectives

While we support the proposed goals and objectives, we would like to see "optimum yield" discussed as an objective.

2. Sector (Commercial/Recreational) Allocations

Therefore, i support Alternative 2a-4 because it uses a combination approach of historic and recent data, all of which lead to the same result.

3. Commercial Allocations to the States

No stance

4. Rebuilding Plan

I prefer Alternative 4c, a five-year rebuilding plan

5. Transfers

For these reasons, i support removing quota transfers from the Bluefish FMP.

6. Management Uncertainty

I support Alternative 6b, the post-sector split

7. De Minimis Provisions

I support Alternative 7a, the status quo.

8. General Comments

N/a

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Maine, New Hampshire, Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

04/22/2021

John LaFountain

Email

foxseafood@gmail.com

1. FMP Goals and Objectives

Hello,

I stated most of my comments and what I supported via the online meeting . I just wanted add to # 2

2. Sector (Commercial/Recreational) Allocations

As you know my smoked fish business in Narragansett RI purchases a lot of bluefish by from boats and dealers in Rhode Island and from dealers from the eastern states. Just wanted to emphasize that the commercial value of the fishery is not just in the amount paid to the boat.
Although that price has increased significantly. I heard the comment that the "highest value of the fish is to leave it in the water" as it is a lower value fish. I don't think it is considered a lower value fish anymore. I went through my numbers and after checking the retail prices being paid for smoked bluefish $17.99 to $22.99 a pound the retail value of just what I produce is over $1.1 million . My fish is being sold predominantly at fish markets, farmers markets, smaller independent grocery and gourmet markets all up and down the east coast. These are small business many of which are family owned and operated. I have only 3 albeit well paid employees that receive $18 to $23 an hour and health benefits. I know a lot of these fish markets pay and treat their employees well as I do. We have developed the market for smoked bluefish over many years with these customers. From Portland Maine to Chatham MA to Martha's Vineyard , Long Island , the jersey shore , down into Maryland these customers rely on us for a steady year round supply of this local Atlantic shore fish.
If you think about the amount of individual servings and people experiencing this and the joy it brings not to mention healthy nourishment. 500,000 servings is what we make a year.

We cannot afford to give anymore of the commercial percentage to the recreational sector. Smoked Bluefish is a traditional culinary East Coast treat!! Very few recreational fisherman will actually take bluefish on a regular basis and eat it. And even fewer will do the work to smoke it. And if they do most don't do it again. The main way that people enjoy bluefish is by purchasing it either smoked or filleted with the blood lined removed from a local fish monger and that fish must be landed by a commercial vessel.

Side point:
If the recreational sector is mostly catch and release then I have know idea how the estimated numbers they are taking could possibly be that high

How would you describe your primary role in the fishery?

Commercial

Date Submitted

04/22/2021

Norm Staunton

Email

norm.staunton@gmail.com

1. FMP Goals and Objectives

I support the proposed set of goals and an objectives, specifically Alternative 1(a). I would further add that optimum yield is not just the maximum harvest, or landings, or biomass. Particularly for a

predominantly catch-and-release fishery, the socioeconomic benefits of recreational C&R fishing should be included in this metric. I would further add that optimum yield should incorporate the highest possible ecological distribution of that yield over maximizing yield in a single state... by which I mean that restoration of the fishery in Maine in NH should count toward yield higher than poundage in a currently active fishery.

2. Sector (Commercial/Recreational) Allocations

I support option 2a-5 because the data suggests the the bulk of the landings are already recreational and it has been established in many other fisheries that a fish in the water is worth more than a fish harvested. The bulk of the recreational fishery is catch and release, so lets maximize the benefit of that fishery and make bluefish slightly harder to get on the commercial market, but drive up its price as a result to offset the lost poundage to the commercial sector.

I support no phase in. Its more efficient and we need to act now.

3. Commercial Allocations to the States

I am no fisheries scientist. What I do know is that Bluefish are a migratory fish which used to be abundant in New England waters. They are not now. And I cannot get past the idea that the states with the highest commercial allocations are also the states that make up the gauntlet that fish swim through to get to my home waters in Maine and Rhode Island. I cannot advocate for a specific allocation, but I would encourage the board to enact whatever allocations result in the greatest/widest geographic distribution of fish and economic benefit, not simply the highest harvests.

4. Rebuilding Plan

I support managing for abundance and geographic distribution of fish. As such, I support shortened Rebuilding times. I am not familiar enough with the alternatives to state a preference between 4b and 4c, but I would advocate for whatever alternative provides the fastest recovery, regardless of the impact on short-term harvest. I would prefer recovery over harvest at almost any cost.

5. Transfers

I am absolutely opposed to transferring unused recreational quota to the commercial quota. A fish in the water is worth much much more to the economy and to recreational fishermen (who largely release their catch to be caught again).

Released fish SHOULD NOT be counted as quota. They are not harvested and thus should not count.

I am fully supportive of commercial harvest and commercial fishermen. I was one at one time (in a different fishery). But the recreational sector has a much larger and more equitably distributed benefit than the commercial sector does, and the fishery should be managed (for abundance) as such.

I do not support any of these alternatives, but rather support an end to transfers and its removal from the BFMP.

6. Management Uncertainty

Frankly, I do not think there is sufficient data to support any of these alternatives. There are many challenges to monitoring all catch, all harvest, all mortality and we do not have enough information to be able to accurately predict any one- particularly in light of the fact that many of the bluefish caught by the recreational sector are released. I would support additional research, focused primarily on the

recreational and C&R sectors before supporting any of the stated alternatives. That said, if one must be picked, I would support 6b- Post Sector Split because it minimizes cross-sector impacts.

7. De Minimis Provisions

De Minimis catch is a very small portion of the total catch. As such, I would support option 7a but with the additional comment that this is a coastwide fishery. Abundance and greater distribution of benefit (ie increasing De Minimis catch) is actually preferable. Additionally, since De Minimis is calculated only using commercial landings, I would advocate for caution in this approach based on the the ways that other fisheries have used conservation equivalency to manipulate their numbers.

8. General Comments

As stated in several sections above, I would support any measures that:

Increase abundance

Distribute fish and economic benefit across the greatest range (including restoration of abundance in states where it once was but is not anymore)

Values a fish in the water over fish harvested for both its social and economic value.

Thank you for taking the time to consider my comments.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Maine, New Hampshire, Rhode Island

Date Submitted

04/22/2021

Robin Calitri

Email

csicagain@hotmail.com

1. FMP Goals and Objectives

As a Charter Captain I completely support the position advocated by the American Saltwater Guides Association to protect and restore a robust sport fishery for Bluefish.

5. Transfers

No transfers

Primary state(s) you land bluefish in:

New Hampshire

Date Submitted

04/22/2021

Ralph Haddock

Email

ralphhaddock@aol.com

1. FMP Goals and Objectives

Use the new goals and objectives.

2. Sector (Commercial/Recreational) Allocations

Support 2a

3. Commercial Allocations to the States

Use 3a

4. Rebuilding Plan

4b

5. Transfers

5a-1 and 5b-1

6. Management Uncertainty

6b

7. De Minimis Provisions

7e

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/22/2021

Thomas Smith

Email

bluefish4@comcast.net

2. Sector (Commercial/Recreational) Allocations

I'm in favor of status quo, every single pound of commercial bluefish on the East Coast has been documented and are extremely accurate , recreational catch is to often randomly and inaccurately determined. I support 2a-1

3. Commercial Allocations to the States

I am in favor of 3a-2 or 3a-3 . Due to the natural cyclic nature of bluefish, New York , Massachusetts and Rhode Island has been the epicenter of Bluefish landings for the last 10 years . I feel like this is a trend and also some Southern states with large quota no longer allow certain types of gear types since the 1980s when they were originally given a generous percentage of the bluefish pie. Therefore it is unrealistic to keep the quota the same for those states going forward. Luckily here in Massachusetts we have been able to get a transfer of quota from other states the last 10 years to keep our local fisheries going through the fall instead of a closure in August.

5. Transfers

State to state transfers are extremely important to the cyclic nature of the Bluefish fishery. Bluefish are fickle and due to environmental circumstances some states will have an influx of fish some years and lean other years. it's very important to be able to receive or transfer quota to take full advantage of a particular season. I have been full-time commercial bluefishing for over 40 years, in the 60s Bluefish

were unheard of on Cape Cod and it was rare to catch one! by the early 1980s they were literally the most prolific fish off Cape Cod, this boom or bust nature has been going on forever whether they were being fished on or not. Massachusetts Has relied on transfers for many years to keep the local fishermen, restaurants and fish markets in fish through the fall.

8. General Comments

Having fished for Bluefish full-time for over 40 years I feel like I've seen almost every aspect of this fishery in New England. We've had lean years followed by incredible years, never been a rhyme or reason whether they are Fished on or not. I feel like the cyclic nature of the fishery is never discussed enough and too many people point fingers at user groups when we have a lean year, most probably due to poor spawning conditions offshore for those particular years that resulted in weak reproduction for that timeframe

How would you describe your primary role in the fishery?

Commercial

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Gillnet

Date Submitted

04/22/2021

Nick Martin

Email

nixstyx@gmail.com

1. FMP Goals and Objectives

I support the current FMP goals.

2. Sector (Commercial/Recreational) Allocations

I support Alternative 2a-4.

4. Rebuilding Plan

I support alternative 4c.

5. Transfers

I do not support either alternative, and instead suggest transfers be removed from the Bluefish Fishery Management Plan.

6. Management Uncertainty

I support 6b, the post-sector split.

7. De Minimis Provisions

I support the status quo option, 7a.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Maine, New Hampshire

Gear type(s) used

Hook and line or handline

Date Submitted
04/22/2021

Elmer Edwards

Email
gannet349@gmail.com

1. FMP Goals and Objectives
Increase Northern Blue Fish quota, and leave Commercial and Recreational Allocations status quo.

2. Sector (Commercial/Recreational) Allocations
Commercial and Recreational Allocations status quo

3. Commercial Allocations to the States
Increase Northern quota

5. Transfers
Allow transfers both ways

How would you describe your primary role in the fishery?
Commercial

Primary state(s) you land bluefish in:
New York

Gear type(s) used
Gillnet

Date Submitted
04/22/2021

Sawyer Clark

Email
sawyerjclark12345@hotmail.com

1. FMP Goals and Objectives
No action/ status quo option

2. Sector (Commercial/Recreational) Allocations
Status quo, if possible more to commercial

3. Commercial Allocations to the States
Status quo

4. Rebuilding Plan
No action/status quo

5. Transfers
No action/ status quo

6. Management Uncertainty
No action/status quo

7. De Minimis Provisions
No action/ status quo

8. General Comments

As a pound trap fisherman in New York, I would like to see more bluefish quota go to the commercial fishermen. I know it is unrealistic, but in this day and age the fishing industry is under a lot of pressure. With this, if you take more quota away from commercial fishermen you are increasing the financial strain and may force many people to leave the industry. Last year with plenty of blue fish around we were shut down and no quota was transferred from recreational to commercial, with this loss of fish my income suffered tremendously. In my eyes, if recreational fisherman lose a couple fish it won't have any impact on their day or year. While if we were to lose quota I may not be able to afford my mortgage or start a family.

How would you describe your primary role in the fishery?

Commercial

Primary state(s) you land bluefish in:

New York

Gear type(s) used

Pound net

Date Submitted

04/22/2021

Richard Rich

Email

rich18rich@aol.com

1. FMP Goals and Objectives

a sustainable optimal yield should be up for discussion.

2. Sector (Commercial/Recreational) Allocations

2a-4 would be best, looking at the numbers.

3. Commercial Allocations to the States

3a-3.

4. Rebuilding Plan

5 year risk policy would be my choice.

5. Transfers

quota transfers should be removed.

6. Management Uncertainty

post-sector.

7. De Minimis Provisions

7a status quo.

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

Maine

Gear type(s) used

Hook and line or handline

Date Submitted

04/22/2021

John Toth

Email

tothjohn@verizon.net

1. FMP Goals and Objectives

I attended this Webinar and hav the following comments to make:

This Webinar was poorly attended and I believe only a total of 15 people were on it which is not giving you the information you need to make a thoughtful decision on any option. Better posting of these meetings needs to be done or outreach!

Bluefish are not on our inshore waters as they used to be because of habitat issues caused by sandmining, Sandy and climate change which gives the impression that the stocks ar in trouble. Because of these issues also affecting the lack of bait, the bluefish have moved off to federal waters.

We are allowed to catch 3 fish from shore and 5 fish fro for-hire boats. How much more can you cut back from the recreational sector? Do more and you will put more tackle shops and for-hire boat out of business already struggling because of COVID-19! John Toth JCAA President

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

New Jersey

Gear type(s) used

Hook and line or handline

Date Submitted

04/23/2021

Rick Sasser

Email

rick.sasser@hotmail.com

1. FMP Goals and Objectives

I am in favor of revised goals and objectives. It is a management travesty for bluefish to be overfished and overfishing occurring in all but one of the most recent years. Commercial harvest, although small, should be honestly reviewed. I hope we are not commercially harvesting bluefish for cat food like we did at a time weakfish. We know what happened to weakfish. Bluefish should be management for abundance.

2. Sector (Commercial/Recreational) Allocations

Move immediately to a 89/11 split- options 2a-2 and 2b-1.

3. Commercial Allocations to the States

3a-1
3b-1
3c-1
3d-1

4. Rebuilding Plan

4C meet the 5-year rebuilding plan.

5. Transfers

We need to stop the transfer of unused quota from the recreational sector to the commercial sector. We should be retaining unused recreational quota in the biomass to build abundance.

Choosing one it would be 5b-2.

6. Management Uncertainty

6a No Action

7. De Minimis Provisions

7c

How would you describe your primary role in the fishery?

Recreational (private angler)

Primary state(s) you land bluefish in:

North Carolina

Gear type(s) used

Hook and line or handline

Date Submitted

04/23/2021

Sarah Schumann

Email

schumannsarah@gmail.com

1. FMP Goals and Objectives

no comment

2. Sector (Commercial/Recreational) Allocations

Preferred option: 2a1, status quo

The reason we are recommending the status quo is that the commercial fleet cannot afford any major reductions to the commercial quota. If bluefish were a secondary species that we could live without,

this might be different. But for boats like the one I work on, it is our primary target. Any lowering of the ABC will already make it harder for us to keep generating the income to support ourselves, our families, and our businesses. To then further curtail the commercial quota by reallocating some of it to the recreational sector would only further the economic damage on the commercial fleet.

3. Commercial Allocations to the States

Preferred options:
3a-3 (10-year) AND 3b-1 (no phase-in) OR 3a-2 (5-year) AND 3b-2 (allocation change spread over rebuilding plan)

Bringing allocations up to date with the current distribution of the fishery resource is really critical. There are arguments for doing this as fast as possible, for the sake of the fishermen in areas where the stock is increasing (like me). But there are also arguments for taking a more gradual pace, following a "just transitions" framework for those whose access to the stock is shrinking as the its center of biomass shifts.

Even though an immediate re-allocation based only on the most recent years is in my own self-interest as a Rhode Island fisherman, I see the wisdom in taking an approach that is more considerate of states to our south. Thus, I am recommending one of two combinations, both of which I believe present a compromise solution.

Moreover, in general, I tend to feel that a 10-year basis may be better for taking into account the effects of inter annual variability in stock distribution. But I will defer to the scientists on that.

4. Rebuilding Plan

Preferred option:
4c P* Council Risk Policy – 5-year Rebuilding Plan

5. Transfers

Preferred options:
5a-1 No Action/Status Quo
5b-1 No Action/Status Quo

6. Management Uncertainty

Preferred option:
6b Post-Sector Split

7. De Minimis Provisions

Preferred option:
7d Recreational De Minimis – rollover management measures

8. General Comments

I work as a deckhand on an inshore gill netter out of Point Judith, RI. Bluefish is our primary target species and it makes up the lion's share of our income. Our bluefish goes to the local smokehouse. From there, it is distributed to fish markets, farmers markets, smaller independent grocery and

gourmet markets all up and down the east coast. Fox Seafoods smoked bluefish is the finest smoked fish around!

There are not many commercial boats that make bluefish a key part of their fishing portfolio. But for those who do, like us, it's a really big deal.

According to my captain, who's been fishing them far longer than I have, there has not been any decrease in our catch of bluefish in recent years. Ever since I started working on this boat in 2019, we have been doing well. However, each year we have to ask our state to secure state-to-state quota transfers because the quota runs out long before the fish have departed out local waters each fall. Any drastic reductions in RI's bluefish quota would cause our season to end much earlier than it currently does, and would have serious impacts on our income.

In addition, we would like to recommend consistency in the minimum size for bluefish, brining all states into alignment with Rhode Island's minimum size of 18". The market for small bluefish is limited and we believe it is preferable to allow them to mature before harvesting them.

How would you describe your primary role in the fishery?

Commercial

Primary state(s) you land bluefish in:

Rhode Island

Gear type(s) used

Gillnet

Date Submitted

04/23/2021

James Goodhart

Email

jgoodhart56@aol.com

1. FMP Goals and Objectives

Bluefish management has been a failure for several decades. We used to have an abundant population until 20 years ago. Now catching any bluefish is a very rare occurrence. I haven't been able to take out clients to target bluefish for over ten years, because the population is so decimated. We need to take immediate and drastic action!

2. Sector (Commercial/Recreational) Allocations

2a-2

4. Rebuilding Plan

4b

5. Transfers

5b-2

8. General Comments

Bluefish management has been a failure for several decades. We used to have an abundant population until 20 years ago. Now catching any bluefish here is a very rare occurrence. I haven't been able to take out clients to target bluefish for over ten years, because the population is so decimated. It concerns me that it has taken so long to accept and come to grips with the reality that this once abundant resource has been massively depleted. Immediate and decisive action is definitely needed and half measures should be unacceptable!

Capt. James Goodhart
Shadowcaster Charters

How would you describe your primary role in the fishery?

Recreational (for-hire)

Primary state(s) you land bluefish in:

Massachusetts

Gear type(s) used

Hook and line or handline

Date Submitted

04/23/2021

Timothy Froelich

To Whom it May Concern:

I am writing in regards to the bluefish allocation and rebuilding amendment. I feel as though, if the bluefish have not been rebuilt we need to re evaluate the goal. We are not even close. That is a red flag that something is very wrong. Maybe those standards are too high. Things are not what they were back then. They are not what they were back in the 80's when those standards were put into place. The spots where the bluefish would grow are developed now and the bluefish are not going there anymore. The little creeks all have houses on them and the meadows are built on. The water quality is not the same. The bluefish may never come back to that level.

Also, I feel they cannot take anymore from the commercial fisherman to give to the recreational. They can redistribute commercial quota from other states to give to New York so they don't have to transfer.

Timothy Froelich

Date Submitted

04/23/2021

Bonnie Brady

Email

greenfluke@optonline.net

1. FMP Goals and Objectives

Because of the historical overfishing by the recreational sector and limited discards in the commercial sector, it would be a plus for the overall sustainability of the fishery to make both sectors carry accountability measures, such as pound for pound payback.

Commercial fishermen should not suffer a loss to their sector's quota because of chronic overfishing of the stock by the recreational fishery.

These comments are on behalf of the Long Island Commercial Fishing Association.

2. Sector (Commercial/Recreational) Allocations

Sector allocations.
We support 2A-1 status quo

Should 2A-1 not be chosen, then and only then do we support re phase in 2B-2

3. Commercial Allocations to the States

We support 3A-2 or 3A-3, 3B-2, and 3D-1

4. Rebuilding Plan

We support 4D

5. Transfers

We support 5A-1 and 5B-1

6. Management Uncertainty

We support 6B

How would you describe your primary role in the fishery?

Commercial

Primary state(s) you land bluefish in:

New York

Date Submitted

04/23/2021

3.2 EMAIL AND LETTER COMMENTS

From: Jean Public <jeanpublic1@yahoo.com>
Sent: Monday, February 22, 2021 2:52 PM
To: Seeley, Matthew <mseeley@mafmc.org>; dleaning@mafmc.org; info@peta.org; info@pewtrusts.org; scoops@huffpost.com; contac@thedodo.com; info@oceana.org
Subject: Fw: MAFMC and ASMFC to Hold Public Hearings for Bluefish Allocation and Rebuilding Amendment comment on bluefish

the fish profiteers steal as much as tehy admit catching. this agency has been notiroius in doing nothing to stop the stealing and poaching that these men do. they pollute thre ocean and need to be shut down. the fact that the stock needs rebuilding is a testament to your ineffectiveness and negligence in setting quotas that make sense and are sustainable. obviouisly you are nothing but a poseur for the fishing profiteers and yiou let them get away with murder. this comment is for the publci record. cut the quota by 50% immediately. jean publiee jeanpublic1@yahoo.com

From: Dave Anderson <davez28327@yahoo.com>
Sent: Tuesday, February 23, 2021 12:52 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Blue fish Striped Bass quotas.

You want to be serious about restoring these fish, STOP commercial harvesting of these species for a couple years. The sport fisherman is not the one damaging the survival of the fish. They are NOT taking them by the Metric Ton daily

From: Charles Foster <chcfsalar@gmail.com>
Sent: Tuesday, February 23, 2021 12:55 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: BLUEFISH

Good day,
I am not a biologist, I am a fisherman and I principally FLY FISH in Massachusetts waters from shore. We have not seen Bluefish plentiful in Massachusetts waters for over ten years. .
Because I also conduct environmental work along the coastline and have done so many tiems in many states for the past 15 years,

What I see as a supplemental reason for the decline of the species is men with Bags. . Men out scooping up as many juvenile bluefish as they can carry. In New Jersey, In long Island sound and in anyplace where they can to get a bunch of appetizers which I believe they call "Cocktail blues". Thousands upon thousands of juvenile 5 inch bluefish.

Adult Bluefish are a fantastic gamefish. There just are not enough of them The recreational captain's Charter boats used to slaughter them 10 per person every single day two trips per day and that Obviously lent itself to the huge reduction in adult blue fish.

Most everyone knows that Bluefish are not great table fare yet they GAFF MURDER and FILET them by the 10s of thousands along the entire eastern seaboard..NO GAFFING BLUEFISH FOR ANY REASON

Reduce the harvest to ONE fish per Trip just like striped Bass - Reduce the harvest for 5 years - give them a chance to comeback. Just llke Striped Bass - Humans are the Problem and the answer,

ENFORCEMENT FINES and LICENSE CONFISCATION. . ..

CHCF

From: Harry Van Sciver <hbvswhitebriar@gmail.com>
Sent: Tuesday, February 23, 2021 12:56 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish

2a-2 is best.

Moderate reduction in commercial, moderate increase in recreational.

And I'm OK reducing Bluefish recreational catch to 5 per day.

Harry Van Sciver
Marstons Mills, MA

From: joebrodsky <joebrodsky@comcast.net>
Sent: Tuesday, February 23, 2021 2:43 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish and striped bass

I don't think the management of bluefish and striped bass around Cape Cod can be properly done without addressing the harvesting of squid in Vineyard and Nantucket Sounds. Though this is a political hot potato, if we don't limit the harvesting of the favorite food of these species, which also costs us the loss through by catch mortality of several other game fish species, then we are wasting our efforts to support the Bluefish and Striped Bass rebuilding.
Joseph Brodsky
Falmouth, Ma

From: peter erickson <cperickson48@gmail.com>
Sent: Tuesday, February 23, 2021 3:12 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: END BLUEFISH TOURNAMENTS

M. Seeley:
Here on Ipswich Bay, through the mid 70's, a fishermen could not give bluefish away. The blues would commonly force schools of mackerel into our cove and up on the rocks, on a dark night one could see comets of bluefish chasing bait and the estuaries were full of "snapper blues" breaking the surface. Boats would approach with garbage cans full of bluefish trying to give them away. And now they are gone.

There was then a period of years when it suddenly occurred to saltwater fishermen that you could actually catch and release as size limits were imposed and the numbers, tho' diminished, began to even out. And as

the striped bass returned, the bluefish population began to stabilize, despite annual bluefish "tournaments" held by every club and marina all along the coast.

The last time I saw bluefish in any numbers was at Lane's Cove in Gloucester. There was a drunken bluefish tournament with blues piled head high on the wharf, in the hot sun…. killed and gone to waste. Unceremoniously dumped overboard. So why'd they have to kill them?

Despite so-called "catch-and-release" tournament rules (when they exist at all) bluefish, by their nature (and their teeth), are hard to release unharmed. Even if numbers could be stabilized through catch-and-release, this is not the way to rebuild stocks. **There will never be a sustainable fishery for bluefish unless it begins with a moratorium on all bluefish tournaments.**

Peter Erickson
Plum Island
><iii;>

From: n n <gentlemanofthecharcoal@gmail.com>
Sent: Tuesday, February 23, 2021 3:43 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Amendment comment

I've lived in Massachusetts since 1973 and have actively fished salt water for much of that time....and my public comment is that the fishery for bluefish has COLLAPSED. This formerly reliable catch and healthy/high omega 3 fish for consumption is no longer a dinner offering at my table. It has VANISHED from all the inland waters that I have fished my entire life. The decline in both scup and bluefish has made my opinion of Massachusetts waters, particularly Buzzard's Bay...grow from a feeling of ecstasy that I was so lucky to live here...to outright despondency at the ruin of this once great fishery for the average citizen.

One bluefish in 2019...none in 2020...and no scup for the past three years. In 1986 they actually jumped in my canoe at times with the peanut bunker they would chase...what a horrible and devastating decline it has been.

From: Mark Mattson <mark.d.mattson@gmail.com>
Sent: Wednesday, February 24, 2021 9:07 AM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish plan comments

Dear MAFMC,
I read the summary document and the brief 7 point options for management. While I have a degree in biology and a PhD in aquatic ecology from Cornell with coursework in population biology I am confused by your documents. It appears to be a deliberate attempt to obfusticate the science. Furthermore, the narrow range of options you present are not the options we would like to see. I can only assume you are doing this to stifle meaningful public comments so you can choose from a set of limited options that you prefer. The fact of the matter is that MAFMC has repeatedly allowed overfishing and that bluefish, along with the other fish stocks, are at a fraction of past numbers. I hope that someday you will develop the structure and discipline that would allow you to join members of the subphylum vertebrata that you propose to protect.

-Mark Mattson, PhD

From: Chris Cain <doskil@gmail.com>
Sent: Wednesday, February 24, 2021 7:24 PM

To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Allocation and Rebuilding Amendment

Bluefish stocks in North and South Carolina are way down from when I was a kid in the 1980s.

They need to be rebuilt

I support 2a-2: 89% recreational, 11% commercial

Thank you

Chris Cain

From: Marc Lamothe <marcolamothe.keeper@gmail.com>
Sent: Wednesday, February 24, 2021 7:25 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Comments

I have worked as a charter captain for ten years. My season starts the last week of June, and sometimes extends to the end of September. I primarily work as a school teacher.

In my inaugural charter season bluefish were prevalent in the waters of Saco Bay, Maine, just south of Portland. My first customers were excited and I had many repeat customers from that experience. Most of the fish were in the 8-12 pound category. Since that season I have not had a customer catch a bluefish.

I am not a fisheries biologist, so my knowledge of bluefish numbers on waters south of Saco bay is limited.

I understand that bluefish migrations into Maine have been sporadic historically. As a young fisherman (1972?), bluefish arrived for the "first time in forty years", was the quote from an old fishing friend. In that era (early 70's into 80's) we caught and wasted large, beautiful bluefish, as if the resource would never be depleted, no matter what we did. We showed them off, then buried them in the garden. Striped bass were our preferred table fare.

I believe catch limits and size limits should be implemented. My hope is that if bluefish numbers increase the probability of migrations returning to Maine will increase.

Capt. Marco Lamothe
Saco, Maine

From: Tony Saldutti <tsaldutti99@gmail.com>
Sent: Monday, March 1, 2021 1:51 PM
To: Kiley Dancy <kdancy@mafmc.org>
Cc: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Ammendment Feedback

Thank you for allowing a surf fisherman's perspective to drive a better solution for the fish.

Your comments on quota transferring should be a red flag for us. It either tells us the allocation was wrong in the first place, or the fish are in greater trouble that we think, and greater restrictions are an order.

The categorization of boats, whether privately owned or for hire, in the same category as surf fisherman is unfair for the surf fishermen. The boats are hunting the huge schools of fish just like the commercial boats.

It sounds far fetched, but please consider no more new boats and a gradual boat reduction over time.

The surf fisherman are not the problem here. It is the predatory nature of all boats and the technology to find the fish in large numbers that I believe to be the problem.

The beach replenishment processes going on up and down the coast are decimating the habitat for the fish as well. The bait is no longer there to hold the larger fish. We should address this issue ASAP. If they refuse to stop pumping sand, they must be forced to establish structure in the water to reestablish the habitat for the fish. I can't believe all of the tree hugging environmentalists are not all over this!

As for what we can do now, I would suggest the following:

- impose lower overall seasonal limits now in one shot
- implement lower daily catch limits across the board (greater than or equal to one daily)
- institute a bonus system in exchange for a mandatory data log from fishermen
- have all states follow same rules
- institute a voluntary tag program to track migratory trends and mortality

From a heuristic point of view, something is seriously wrong with this fishery. We have not seen large bluefish or striped bass in 3 years on the beach, except a few days in the spring. The fall used to be a bonanza. The peanut bunker and mullet are gone. The sand eels are down significantly. Gannets are gone too. We have to do something drastically now or it will be too late to recover.

Thanks.

Tony Saldutti, CPIM
610-533-2711
tsaldutti99@gmail.com

From: Jean Public <jeanpublic1@yahoo.com>
Sent: Monday, March 8, 2021 4:44 PM
To: Seeley, Matthew <mseeley@mafmc.org>; info@peta.org; info@seashepherd.org; information@sierraclub.org; info@pewtrusts.org
Cc: info@oceana.org
Subject: Fw: public comment on federal register

bluefish quotas have been overfished for years and this agency has allowed the species to be overfished. how can we now trust this agency which deliberately allowdd this overfishing for years? i am in favor of cutting all quotas by 50% immediately. and no other factors except to start watching what the fishing boats come in with because they are taking 90% over what they are allowed. and you are allowing it by not catching them at

this robbery of our national species. this comemtn is for the pubcli record please receipt. jean puboee
jeanpublic1@yahoo.com

From: Robert Severi <robert.severi@gmail.com>
Sent: Monday, March 22, 2021 6:23 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Comments

Dear Sir or Madam,

I'm providing anecdotal evidence for your consideration. I've been a boater fishing inshore around Long Beach Island since 1982. As you know, bluefish stocks, like most others are faltering. For the last two years, not one bluefish has been entered in the LBI Surf Classic. Almost 1,000 surf fisherman fish LBI for 10 weeks in the fall. Large bluefish no longer visit Great Bay in the Spring. I'm a recreational fisherman, not a marine biologist or scientist. Accordingly, I defer to the judgment of such subject matter experts. Please rely on science to determine how to ensure that the bluefish fishery thrives. If a moratorium is required, so be it.

Kind regards,
Captain Bob

From: Dustin C. Leaning <DLeaning@asmfc.org>
Sent: Wednesday, March 31, 2021 11:04 AM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: I just pulled TJ's email comment from our email chain

Good morning,

Looking at data based on "New MRIP" being frustrating is a pretty accurate description...
The biggest problem with the "scientific data" is that is not scientific. It is anything but. It is simply put- a totally overcomplicated math equation (based on guesses), favoring an environmental or political agenda to rid the world of recreational fishermen.

Harvest figures in such a small state as ours isn't complicated. Connecticut has only 6 target species, all of which are seasonal. You just need access to a small plane with EXPERIENCED fishermen in the passenger seat. After 2 or 3 seasons of figuring out the patterns of the fishermen and working the kinks out, you would find the New MRIP overshoots the figures by 75 -95% for "most" of the species the ASMFC manages.

Thank you,
Capt. TJ Karbowski
Rock & Roll Charters
Clinton, CT
203.314.3765
https://rockandrollcharters.com/

From: Frank Walsh <squidder329@gmail.com>
Sent: Thursday, April 1, 2021 11:31 AM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: "Bluefish Amendment"

I would be happy to see significant catch restrictions on bluefish from snappers to gators. Large bluefish are non-existent within five miles of the beach in Southern New Jersey. Two fish limits for adult fish as they don't freeze well and excess will end up in trash or garden.

Thank You
Frank Walsh

From: Vetcraft Sportfishing <vetcraft@aol.com>
Sent: Thursday, April 1, 2021 3:29 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: bluefish amendment comments

In light of the recent MRIP phone based survey showing a recreational catch 116% higher than the MRFSS data when the bluefish allocation was formed, I think the fairest option is 2a2. In light of the fact that the commercial sector has not utilized their quota (except 2020), can appreciate price increases with reduced quotas, and low price per pound of this fishery, I think the loss of quota to the sector would be minimal. The recreational sector in the Cape May, NJ area where I fish runs many charter trips to target bluefish out on the five fathom bank area. This is also an important fishery from shore sites and is often the first fish caught by the young generations.

I am not in favor of any quota transfers between sectors due to the uncertain nature of fish stock analytics and inaccuracy of MRIP data. Disallowing quota transfers will also help to build back the stock.

Capt Harv
Vetcraft Sportfishing
Cape May, New Jersey
Call or Text 610-742-3891
Email: vetcraft@aol.com
www.vetcraftsportfishing.com

From: William Nicholson <sirunick@comcast.net>
Sent: Thursday, April 1, 2021 8:04 PM
To: Leaning, Dustin Colson <dleaning@asmfc.org>; Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish management

Thank you for giving a good presentation of a complicated subject! I am a recreational fisherman from Massachusetts. My experience says that the blues are way overfished and should be rebuilt as quickly as possible.
I agree with the comment that the threshold should be raised. I would say at least to 125,ooo mt and the target might as well be lowered some to 175,000 mt since we have never come close
to the target on the chart. I see no benefit to the consumer by giving the commercial fleet a bigger % of the catch. The recreational fisherman enjoys the freshest fish and they deserve it after a long day on the water. The charter fleet depends on blues to keep their sports happy especially with the lack of stripers.

I am not sure how the catch is verified. I have never been checked in my many years of fishing. I understand that you use estimates but wonder how accurate they are. That said, I would support 4b. Allocation 2a-3
I would not supporttriggers. As the Navy Seals say "KISS".

Thank you for your work,

William"Nick"Nicholson
Member Cape Cod Salties

From: Dean Pesante <dpesante@cox.net>
Sent: Monday, April 5, 2021 7:12 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Re: Bluefish Management Letter for Mid-Atlantic Fisheries Council Meeting

The only other comment I would have right now is to increase the minimum size limit to 18" for both recreational and commercial. This is the size that the fish are 100 percent sexually mature. Common sense fisheries management. Don't harvest a fish until it has the opportunity to reproduce. We have already done this for the commercial sector here in Rhode Island.

From: Arthur D Smith <artsmith@rsnet.org>
Sent: Tuesday, April 6, 2021 5:44 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Cc: Hemilright Jr, Dewey <FVTARBABY@embarqmail.com>; bjseafood <bjseafood@earthlink.net>
Subject: Bluefish Allocation and Rebuilding Ammendment

MY NAME IS ART SMITH FROM BELHAVEN, NC. I CONSIDER MYSELF A RETIRED ADVOCATE FOR THE COMMERCIAL FISHING INDUSTRY IN NORTH CAROLINA. I AM DISAPPOINTED THAT THERE IS NO ALTERNATIVE THAT WILL ALLOW FOR AN INCREASE IN THE COMMERCIAL ALLOCATION. THAT BEING SAID I CAN ONLY SUPPORT THE STATUS QUO ALTERNATIVE. I SUPPORT STATUS QUO FOR THE FOLLOWING REASONS.

1. THE COMMERCIAL FISHERY HAS MINIMAL DISCARDS. THE REC FISHERY HAS A SUBSTANTIAL AMOUNT OF DISCARDS. I HAVE BEEN TOLD BY RELIABLE SOURCES THAT REC DISCARDS COULD BE AS MUCH AS NINE MILLION POUNDS PER YEAR. AN INCREASE IN REC ALLOCATION WILL RESULT IN AN INCREASE IN DISCARDS. AN INCREASE IN DISCARDS IS UN-ACCEPTABLE. THE COUNCIL MUST DO ALL IT CAN TO DECREASE DISCARDS.

2. ALTERNATIVES OTHER THAN STATUS QUO WILL RESULT IN COMMERCIAL DISCARDS WHERE NONE EXIST NOW. THE ALTERNATIVES INCREASE QUOTAS FOR STATES LIKE NEW YORK, RHODE ISLAND AND MASSACHUSETTS AND DECREASES FOR STATES LIKE VIRGINIA, MARYLAND AND NEW JERSEY. LOWERING QUOTAS FOR THESE STATES WILL RESULT IN INCIDENTAL CATCHES OF BLUEFISH BEING DISCARDED.

3. I AM RELUCTANT TO BRING THIS POINT UP BUT COMMERCIAL INTERESTS IN NEW YORK, RHODE ISLAND AND MASSACHUSETTS WOULD PROBABLY GO ALONG WITH ALTERNATIVES OTHER THAN STATUS QUO. THESE STATES WOULD BE RECEIVING A LARGER SLICE OF A SMALLER PIE BUT WOULD STILL BE GETTING MORE PIE THAN THEY HAVE NOW. I WOULD THINK THESE STATES WOULD ADVOCATE IN THEIR OWN INTERESTS. IF "FAIR AND EQUITABLE" IS ONE OF THE MANAGEMENT GOALS THIS REDISTRIBUTION OF QUOTA IS NOT FAIR AND EQUITABLE.

4. 83% FOR THE REC SECTOR IS GRACIOUS A PLENTY. THIS DOES NOT NEED TO BE CHANGED. FISH STOCKS MOVE CONTINUOUSLY SO EVEN A FIVE YEAR UPTICK FOR ONE STATE IS NOT INDICATIVE OF A SHIFT IN ABUNDANCE. STATE QUOTAS DO NOT NEED TO BE CHANGED.

5. SINCE I SUPPORT STATUS QUO THERE IS NO NEED FOR ME TO ADDRESS THE OTHER ISUUES SUCH AS "PHASE INS" OR "DE MINIMIS STATUS".

THANK YOU,

ART SMITH
BELHAVEN, NC

From: EDMUND PANZELLA <user@votervoice.net>
Sent: Tuesday, April 20, 2021 10:07 AM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Allocation and Rebuilding Amendment

Dear Mr. Seeley,

Sir, I can tell yo that as a recreational fisherman for the last 50 years that bluefish stocks are being decimated, particularly in the last 6 years or so. Hard fighting and easy to catch, Bluefish are essential in introducing young people to fishing. Nothing turns a young fisherman off like a day without action. Do whatever you have to do to restore this vital fishery. Thank you,

Sincerely,

EDMUND PANZELLA
117 Dish Mill Rd
Higganum, CT 06441
epanzella@yahoo.com

From: Ken Redman <workkdog@gmail.com>
Sent: Thursday, April 22, 2021 8:06 AM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish amendment

I would like to see the recreational day quota rise from 3 fish/day. I've fished the coast 50 years and can't believe how few fish we as recreational fishermen can actually keep to eat given the financial input we contribute to the economy at the coast while fishing. It has decreased my visits to the coast definitely. Ken Redman, Chapel Hill

From: William Keith <user@votervoice.net>
Sent: Thursday, April 22, 2021 1:15 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Amendment

Dear Mr. Seeley,

As an angler that loves sportfishing, I understand the nature of power grabs and attempts to control with regard to management decisions to ensure the bluefish resource returns to a healthy status. The laws of nature work quite well without man kinds meddling. Therefore, I oppose adding any restrictions on the fishery. They will rebuild on their own without your/our interference or help just at they have for thousands of years.

Thank you for your time and consideration.

Sincerely,

William Keith
PO Box 304
Gulf Hammock, FL 32639
princibill@icloud.com

From: Luis Tirado <captloutirado@gmail.com>
Sent: Thursday, April 22, 2021 8:19 PM
To: Seeley, Matthew <mseeley@mafmc.org>; comments@asmfc.org
Subject: Bluefish Public Comment

Dear Members of the Board,

I am writing this evening to voice my concern regarding the management of Bluefish. I live in Maine and the Bluefish has become more of a unicorn than a fish. I feel that this is how anglers felt during the Striped Bass crash in the 1980's. Bluefish were once common in our waters, and I can remember when the fishing was so good that this state held Bluefish Tournaments, I know Commissioner Keliher remembers them. It was commonality to see these fish in July and throughout the summer, sadly I have not seen a bluefish in eight years. While that may be somewhat common for other anglers this is alarming to me. I run a charter fishing business, and guide 75-90 days per season.

The bluefish has great value to the recreational community, they provide great sport, they get novice anglers out on the water due to their aggressive nature, they cause clients to book with charter captains, and their unruliness keeps tackle shops in the black. To piggyback on that, they are not exactly great on the table. It is my opinion that they are better off to be enjoyed and then put back.

I am in favor or option 2a-2. And I would like to see measures taken to rebuild the stock as fast as possible. I applaud the measures that were taken last year to decrease bag limits, but I think more needs to be done to bring these fish back to all the states, not just Maine, so that all anglers can enjoy them.

Please take aggressive measures to get this stock back to where it needs to be, not overfished. These fish are too valuable to be taken out of the water and killed.

Thank you for your time,

Captain Lou Tirado
Diamond Pass Outfitters
9 Delaware Ave
South Portland, ME 04016
04106

From: Victor Gano [mailto:vgano@comcast.net]
Sent: Thursday, April 22, 2021 9:40 AM
To: Comments <comments@asmfc.org>
Subject: [External] Bluefish Allocation and Rebuilding Amendment

Hi,

I believe beach replenishment/beach nourishment is pushing bluefish further offshore. The army corps of engineers has destroyed fish habitat along the New Jersey coast from Long Beach island to Cape May Point. The army corps of engineers has done this year after year covering the jetties and covering the beaches with lifeless dead sand. Zero environmental impact is ever done and fish habitat continues to be destroyed year after year.

It is a billion dollar scam and the rich home owners and politicians are brain washed believing that moving sand from offshore to the coastal beaches will save a barrier island or peoples homes. It is a flat out lie. Follow the money trail and you will see the sea of lies behind beach replenishment. Environmental engineers have become environmental terrorists in my mind. I am sick of people like me being ignored year after year.

I have been fishing in South Jersey for over 40 years and I have never seen the fishing suck so bad along the South Jersey beaches.

Please help save fish habitat along our South New Jersey beaches.

From: Jeff Norton <user@votervoice.net>
Sent: Friday, April 23, 2021 3:24 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Allocation and Rebuilding Amendment

Dear Mr. Seeley,

As an angler that loves sportfishing, I understand the responsibility of making tough management decisions to ensure the bluefish resource returns to a healthy status. Therefore, I support rebuilding the bluefish population using the following management actions.

Commercial/Recreational Allocations
I support Option 2a-3: 87% recreational, 13% commercial. This option uses the most recent 20 years of catch data (1999-2018) as opposed to the current allocation

Thank you for your time and consideration.

Sincerely,

Jeff Norton
16 Wellingsley Ave
Plymouth, MA 02360
jeffnrtn@yahoo.com

From: Wesley Phillips <wesley@markjupiter.com>
Sent: Friday, April 23, 2021 3:54 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Cc: Leaning, Dustin Colson <dleaning@asmfc.org>; Davidson, Maureen <maureen.davidson@dec.ny.gov>
Subject: Bluefish Allocation and Rebuilding Amendment

Dear Mr. Seeley,

I am a private recreational angler from NY writing to you regarding the Blue Allocation and Rebuilding Amendment because bluefish are an important part of not just my enjoyment of our coastline but of every anglers. They are fun to catch and on occasion, delicious to eat. It is important to me to see this fish stock rebuilt and maintained so they can continue to be enjoyed at sustainable levels for generations to come.

Fisheries Management Plans Goals and Objectives

I support the set of goals and objectives **(Alternative 1A)** but would like to see biennial analysis of the fishery to better understand the resource and the values that comprise it. This fishery is predominantly catch and release and depends heavily on the maximum sustainable amount of fish in the water. The socioeconomic effect should not be ignored.

Commercial/Recreational Allocations

I support **2a-4**. It represents data from higher biomass years as well as recent timeframes.
I support **2b-1** because there is no, slow, phase-in.

Rebuilding Plan

The most critical part! It must be rebuilt quickly with the opportunity to still harvest as well as protect. I support **Alternative 4c.**

Quota Transfer Provisions

The primary value of this fishery is the catch and release of bluefish and not the harvest. **I recommend transfers be removed from consideration**.

Management Uncertainty

I support **6b, the post sector split**.

De Minimis

I support **7a**

Thank you for taking the time to consider my comments!

Sincerely,

Wesley Phillips

From: Parker Mauck <pgmauck@gmail.com>
Sent: Friday, April 23, 2021 4:47 PM
To: Seeley, Matthew <mseeley@mafmc.org>
Subject: Bluefish Allocation and Rebuilding Amendment

April 23, 2021

Dr. Christopher Moore, Executive Director Mid-Atlantic Fishery Management Council 800 North State Street, Suite 201
Dover, DE 19901

Re: Bluefish Allocation and Rebuilding Amendment

Dear Dr. Moore,

I am a proud member of the American Saltwater Guides Association (ASGA) a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of "better business through conservation," reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Bluefish are a keystone species to recreational fishermen and our coalition, and we are thankful for the opportunity to comment on this amendment.

The bluefish fishery is predominantly recreational, as reflected by historic allocations and catch data. The 2018 revised Marine Recreational Information Program (MRIP) data resulted in recreational catch and harvest estimates much greater than previously believed. In August 2019, bluefish were declared overfished, although overfishing was not occurring. The Council adopted management measures to constrain the recreational sector in December 2019, but to the best of our knowledge bluefish remain overfished, current mortality levels are near overfishing levels, and recreational landings continue to exceed limits.

It is important to note that the recreational bluefish fishery, which makes up roughly 80-90% of historic mortality, is mostly a catch-and-release fishery. From 2010-2019, even with the federal bag limit at 15 fish per person with no size limit, Atlantic coast recreational anglers released about two thirds of the bluefish they caught annually.[1] This demonstrates that the recreational sector values the opportunity to repeatedly encounter bluefish, often more than intentionally harvesting them. The bluefish fishery thus represents a prime example of the value of fish left in the water.

We understand the "ebb and flow" nature of the bluefish stock but believe that there is a great opportunity to improve bluefish management. As such, it is imperative that the stock be efficiently rebuilt to best realize the value and benefits of the fishery.

Below are my views and the views of the ASGA on each of the issues contained in this amendment:

Fishery Management Plan Goals and Objectives

We support the proposed set of goals and objectives (Alternative 1a). However, we would like to suggest that the following objective be added: "Objective 2.3: perform biennial optimum yield analyses to better understand the resource and values therein." MSA requires fisheries management measures to achieve optimum yield, which is defined as a fishery's maximum sustainable yield "as reduced by any relevant economic, social, or ecological factor."[2] Since catch-and-release fishing, which depends on lots of fish in the water, is such a major component of the recreational bluefish

fishery, its impact on optimum yield—namely, the socioeconomic benefits that come from reduced harvest and increased abundance—should not be ignored.

Commercial/Recreational Allocations

While we would normally support allocation based on catch rather than landings and one that solely uses baseline data from the most recent timeframes, **we support Alternative 2a-4 for the following reasons.**

At present, the bluefish stock is overfished, SSB has declined considerably since 2009, and there is a very strong possibility that overfishing occurred in 2019 and 2020. From a management perspective, we believe that base years should include timeframes when the stock was at historically abundant levels. The additional inclusion of recent timeframes will inform how the fishery is currently being utilized. The stock was at its largest in the early 1980s and experienced surges in 1999, 2003, and 2006. Alternative 2a-4 includes catch data from all of those high biomass years as well as landings data from more recent timeframes.

We do not support a phase in because the percentages included in the sub-alternatives would seem to have little real effect—**thus, for efficiency's sake, we prefer Alternative 2b-1**.

Commercial Allocation to the State

We do not wish to offer opinions on the commercial fishery-focused alternatives within the document.

Rebuilding Plan

We strongly believe that the rebuilding plan is the most important component of this amendment. Legally, the Council must adopt a plan by November of this year and rebuild the stock by 2029. **We support Alternative 4c, which is based on the Council's risk policy and projected to rebuild the stock within five years.** This alternative is precautionary to the resource while still providing some short-term opportunity for harvest. The bluefish fishery thrives when the stock is healthy, and rebuilding quickly is critical.

Quota Transfer Provisions

As highlighted above, the recreational bluefish fishery is a predominantly catch-and-release fishery that derives significant value from fish left in the water. We do not support the practice of transferring unused "quota" from the recreational sector to the commercial sector. Recreational anglers choose to release the majority of bluefish, indicating that the primary value of the recreational fishery is in encountering them and catching them—and more often than not, releasing them. Viewing intentionally released fish as unused quota and then transferring it to the commercial sector negates the conservation value of voluntary release practices and manifests a fundamental misunderstanding of the fishery. Additionally, the revised MRIP data tells us that many of the past recreational-to-commercial transfers should not have even occurred. Recreational anglers enjoy the opportunity to

encounter this fish and should not be punished for releasing them. We view transfers in this fishery as a form of dis-incentivizing the practice of catch and release that ignores the benefits it provides.

For these reasons, we do not support either alternative, but rather recommend transfers be removed from the Bluefish Fishery Management Plan.

Management Uncertainty Alternatives

We recognize the need for all fishery sectors to be held accountable, and while we understand the challenges in anticipating and monitoring recreational catch, the uncertainties that such challenges engender should not negatively impact the commercial sector. While we would like to learn more about the specifics of how recreational uncertainty will be considered in reducing recreational harvest limits, **we support 6b, the post-sector split**. In addition, we recommend that the Council support human-dimensions research concerning bluefish angler preferences and values, which could better inform future management decisions and more accurately predict recreational effort, an area of particular uncertainty.

De Minimis Provisions

De minimis states land less than 0.1% of the coastwide commercial landings for the year before, and the FMP does not subject these to recreational management measures. It is our view that these states contribute so minimally to the coastwide stock that additional measures are futile in practice. **Thus, we prefer the status quo option: 7a.** However, as currently written *de minimis* status is determined solely by commercial landings; we would be remiss to not highlight the opportunity for states to "game" this system as conservation equivalency has been used in other fisheries.

Thank you for providing all of the relevant information on this amendment and for considering our input. **I ask that you reflect on your responsibility and your opportunity to take actions that will MANAGE TO ABUNDANCE, which will help bluefish as a species, commercial anglers, recreational anglers, and the thousands of small businesses like mine that depend on the abundance of bluefish and other inshore fish species.**

Sincerely,

Parker G. Mauck
Owner
Westport Fly

Capt. Parker G. Mauck
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277 identical or near-identical versions of the following comment were submitted. The names of the individuals who submitted this comment are listed below.

Dear Mr. Seeley,

As an angler that loves sportfishing, I understand the responsibility of making tough management decisions to ensure the bluefish resource returns to a healthy status. Therefore, I support rebuilding the bluefish population using the following management actions.

Commercial/Recreational Allocations
I support Option 2a-3: 87% recreational, 13% commercial. This option uses the most recent 20 years of catch data (1999-2018) as opposed to the current allocation that uses outdated landings data from the 1980's.

Commercial/Recreational Allocation Phase In I support Option 2b-1: No Phase In. This allocation change does not need a phase in period because it differs by only 4% from the current allocation split. I also believe it is necessary to implement the allocation quickly to avoid any further recreational restrictions which could occur under a phased in approach.

Rebuilding Plan Alternatives
I support Option 4d: use constant fishing mortality to rebuild in a 7-year timeframe. It is uncertain whether fishing mortality or environmental conditions will have more of an impact on rebuilding the bluefish population. Scientists also think that recent changes in recreational catch data make it difficult to determine a rebuilding timeframe. All this uncertainty requires a longer rebuilding timeframe to provide the greatest opportunity to successfully rebuild bluefish.

Quota Transfers
I support Option 5a-2: allow for optional bi-directional transfers with Option 5B-2 a 10% transfer cap. Historically, transfers only occurred from the recreational fishery to the commercial fishery. If transfers are to be allowed, they should be bi-directional; however, I do not support transfers out of the recreational fishery until stock size has increased to a level that allows for equal measures between the for-hire and private modes.

Management Uncertainty
I support Option 6a: no action/status quo. The recreational sector has no ability to address the uncertainty association with recreational catch. Therefore, I believe management uncertainty should not be specific to each sector.

Thank you for your time and consideration.

Submitted by:

John Stillwagon, Jr., Jeff Miller, Phyllis Hamilton, Tony Sergi, Bruce Dana, Richard Terrazzino, Thomas Miloszewski , Dan Gallagher, Leoard McGill, Fred Johnson, Dave Beneway, Dennis Leon, John Higdon, Richard Lacafta, Ronald Lynch, Gary Johnson, William E. Burke, Andrew Roman, Thomas Wood, Alcides Vignolo, Paul Tomasura, Stanley Shenker, David Sams, Gary Harsel, Ken Allen, Rick Wakem, Ted Ring, Michael Avara, Al

Ristori, Perry Rease, George Ballard, Jim Reznik, Daniel McKee, Raymond Sales, Erik Nees, Nicholas Tinaro, Bryan Starke, Nicholas Passaretti, Anthony Cardwell, Ronald Audette, Steve Quigley, Robert Searles, Ben Yang, James Anderson, Scott Riddle, Richard Dowd, Vaughan Dize, Greg Lieb, Steven Fifer, Randy Sizemore, Roy Rhodes, Alex Gerus, Ronald Robichaud, George Fazio, Robert DeBonis, Tom West, Luis Sosa, Andrew King, Mike Piotrowski, Lewis Mitchell, Stephen Hiller, Claudio Ripoll, Joseph Vigorito, Ernest Mellon, Hayden Best, Leslie Hartman, Douglas Simms, Chris Carlson, Ronald Mazzarella, Allen Keith, Ron Broking, Kirk Fay, John Russell, Howard Smith, Charles Goins, Joseph Hughes, Emil Kolodi, Foyt Ralston, Michael Duclos, William Sciturro, Edward Richter, Michael Frybarger, Patrick Callahan, Robert Link, RJ Carl, Jerry Rau, William Byers, Bert Olmstead, Chris Edwards, Christopher Butler, Leo Sands, Bob Verge, German Forero, Daniel Kennedy, Christopher Detweiler, Keith Heiring, Warren Brown, Gary Coleman, Stephen Wuertz, David Anderson, Cy Pizam, John Gruber, Mark Vandenbosch, Arthur Lewandowski, Jose Jaime, Philip Wrublevski, Frank DeCambra, Lynn Behler, John Peters, Richard Bielawiec, Mark Salopek, Joe Reustle, Carl Pearse, Robert Hawryluk, James Stauffer, Walter Fisher, Andrew Slousky, Brook Gabel, Richard Yates, Walter Everard, Tom Warman, Bradford Myers, Richard Pasko, Daniel Carney, Brian Toole, William Kazawic, Gary Akers, John Farrell, Gerald Clark, John Grida, Justice Rivera, Karen Gudzinski, Robert Haimelin, Martin Tait, Ben Speciale, Rick Holmberg, Russell Headley, David Nevin, Victor Regan, Enos Webster, Barry Moak, Joe Temple, Thomas Voltz, Dexter Grindstaff, Bill Bishop, Andrew Petersen, Thomas Gerrity, Michael Ebner, James Kiehnle, Deborah London, Cindy Galvin, Bruce Lawson, Chris Skibinski, Willie McCall, John Chandley, Michael Avara, Michael Wallick, Eric Morrow, Lester Pastewski, Walter Dudek, James Sanders, Patrick Bike, Reed Riemer, Michael Kenney, Chris Buck, Michael Rousseau, Michael Dorich, Jeff Hill, Don Goebel, Joseph Florek, David Pianki, Thomas Duncan, Joe Somers, Christopher DeFoe, Michael Norinsky, Jerry Negron, Paul Cavallaro, Robert Delark, Steven Free, Ralph Williams, Jim Wilkerson, David McCarty, David Hennessey, Robert Klaproth, Aaron Isban, Mark Kaspar, Larry Obuchowski, Maureen Hunt, Larry Rodriguez, Henry Massicotte, Phil Everingham, George Harkness, Stephen Lassiter, Jason Grieco, James Gorel, Mark MacDonald, Richard Rohloff, David Barrows, Michael Hennessey, Dave Kerrigan, Tom Palchanes, Charles Spindelman, Charles Addis, Frank Gundlach, Daniel Lesnieski, Charles Medlock, Alex Fernandez, Stephen Molo, Ronald Rupert, Robert burke, James Romeo, Howard Scheurenbrand, Theo Gionis, John Hooven, Robert Cuddy, Emil Borruso, Ronald Paffrath, Nick Fioravanti, Ed Giordano, Lou Di Bello, Emmett Luck, Steven Christensen, Thomas McGlynn, Debra McGlynn, Darryl Mosher, Michael Mascia, Chris Bartosh, John Lawson, Rob Kaluza, Joseph Gallinoto, Tibor Terek, John Davey, Jon Brunetti, Charles Seitzman, Gene Petit, Albert Conover, Eli Hamid, George Schnepf, Norman Hill, Todd McGonnell, Terence Glass, Doug McPherson, Paul Echavarria, Dennis ODriscoll, Michael DeLuca, Joe Meyer, Jerry Kells, Henry Elsesser, Mike Blaskovich, John Nardi, Terry Langer, Sean Shay, Craig Austin, Nick Murphy, Dan Rapolla, Bill Wrubel, Gerard Galluccio, Cristofer Pastore, Thomas C. Webster , Joseph Jordan, Howard Davis, Jim Foster, Michael Lambert, Matthew Anton, Robert Bennett, William Martin, Claudio Sala, Arthur Lewandowski, Charles Trowbridge, Ian Cochrane, Joel Huerta, Richard Trifone, Ed DeSanto, Robert Maynes, Rick Botoff, Paul Decoste, Francis Tierney, Howard Achilles, Chester Zegler

14 July 2020

To the Mid-Atlantic Fisheries Management Council,

My name is Dean Pesante, owner/operator of the F/V Oceana Inshore Gillnet Vessel based out of Point Judith, Rhode Island. I have been working as a commercial fisherman since 1984 and have captained my own vessel since 1991. On behalf of myself, other commercial fishermen, and shoreside dealerships and businesses throughout the state of Rhode Island, I am writing to you today to express my concern and request action be taken on issues pertaining to recent changes in Bluefish management. Specifically, I am referring to 1) quota distribution between commercial and recreational sectors and 2) commercial quota distributions between the Atlantic states. I am expressing my concerns because the new drastic cuts in quota for the commercial sector would create tremendous hardships for people in the Bluefish industry.

Adjustment of Recreational and Commercial Quota

Currently, Bluefish are in greater demand in the marketplace than they ever have been. More people are buying Bluefish every year, and they have become an extremely desirable fish to eat. The increasing demand for Bluefish has made the fishery more valuable and important to commercial fishermen and related businesses. Consequently, more commercial fishermen and related businesses have come to rely on this fishery and need an appropriate amount of quota to sustain their businesses.

Recent management measures have cut the commercial quota by more than 50%. These measures will create enormous financial and economic hardships for the commercial fishing industry. In keeping true to its mission of providing food to consumers, the commercial fishing industry is considered an essential business, and the reduction in quota will prevent the industry from operating sufficiently. It is important to understand that cutting the commercial Bluefish quota in half will have detrimental social and economic impacts as well as severely and directly hurt the livelihoods of Bluefish fishermen and associated businesses. In creating policies, please consider how you would feel if your income were cut in half.

The commercial fishery is managed with empirical data reported in a responsible manner under Federal and State Laws by both fishermen and dealers. ALL commercial fishermen provide accurate and realistic information to Federal and State entities. In contrast, recreational fishermen are not required by any law to report data nor any information. They only provide information voluntarily, and the data received from recreational fishermen is marginal at best. Because they are not regulated by Federal or State Laws, recreational fishermen that voluntarily report information have the ability to inflate data and exaggerate landings.

It is difficult to understand how such severe quota reductions to the commercial Bluefish industry were made with consideration to incredibly uncertain data from the recreational sector.

For these reasons, we feel the Bluefish quota needs to be reallocated with a much higher percentage given back to the commercial industry.

Adjustment of Commercial Bluefish Quota between Atlantic States

The second issue I would like to discuss is the commercial Bluefish quota distribution between the Atlantic states. Evidence suggests the trend of both Bluefish populations and associated landings by commercial fishermen have changed immensely in recent years on the Atlantic coast. While the population of Bluefish and consequent landings have together increased significantly in northern Atlantic waters, the population and landings have decreased significantly in southern Atlantic waters. These changes are most likely due to climate change and water temperatures.

Southern states that currently have a larger percentage of Bluefish quota have consistently reported landings significantly below their allocation. The opposite is true in Northern states (New York, Rhode Island, and Massachusetts), who have consistently landed an amount of fish that exceeded their quotas. Consequently, northern States have had to request quota be transferred from the Southern states.

I believe an adjustment of quota allocation between the States should be made to accommodate the current state of the Bluefish population and landings. A more accurate and appropriate allocation of Bluefish quota is necessary.

Reductions in quota in the commercial Bluefish industry will have dire consequences for fishermen and related businesses. In this letter, I have proposed the following two solutions to resolve the current problems: 1) Reallocate quota from the recreational sector to the commercial sector and 2) Modify the percentage of commercial quota between Atlantic States to better represent the current trends in Bluefish populations and landings. Please consider these solutions and take prompt action.

Respectfully,

Dean Pesante

F/V Oceana

AMERICAN SALTWATER GUIDES ASSOCIATION
BETTER BUSINESS THROUGH CONSERVATION

April 20, 2021

Dr. Christopher Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE 19901

Re: Bluefish Allocation and Rebuilding Amendment

Dear Dr. Moore,

The American Saltwater Guides Association (ASGA) is a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of "better business through conservation," reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Bluefish are a keystone species to recreational fishermen and our coalition, and we are thankful for the opportunity to comment on this amendment.

The bluefish fishery is predominantly recreational, as reflected by historic allocations and catch data. The 2018 revised Marine Recreational Information Program (MRIP) data resulted in recreational catch and harvest estimates much greater than previously believed. In August 2019, bluefish were declared overfished, although overfishing was not occurring. The Council adopted management measures to constrain the recreational sector in December 2019, but to the best of our knowledge bluefish remain overfished, current mortality levels are near overfishing levels, and recreational landings continue to exceed limits.

It is important to note that the recreational bluefish fishery, which makes up roughly 80-90% of historic mortality, is mostly a catch-and-release fishery. From 2010-2019, even with the federal bag limit at 15 fish per person with no size limit, Atlantic coast recreational anglers released about two thirds of the bluefish they caught annually.[1] This demonstrates that the recreational sector values the opportunity to repeatedly encounter bluefish, often more than intentionally harvesting them. The bluefish fishery thus represents a prime example of the value of fish left in the water.

We understand the "ebb and flow" nature of the bluefish stock but believe that there is a great opportunity to improve bluefish management. As such, it is imperative that the stock be efficiently rebuilt to best realize the value and benefits of the fishery.

Below are our views on each of the issues contained in this amendment:

Fishery Management Plan Goals and Objectives

We support the proposed set of goals and objectives (Alternative 1a). However, we would like to suggest that the following objective be added: "Objective 2.3: perform biennial optimum yield analyses to better understand the resource and values therein." MSA requires fisheries management measures to achieve optimum yield, which is defined as a fishery's maximum sustainable yield "as

reduced by any relevant economic, social, or ecological factor."[2] Since catch-and-release fishing, which depends on lots of fish in the water, is such a major component of the recreational bluefish fishery, its impact on optimum yield—namely, the socioeconomic benefits that come from reduced harvest and increased abundance—should not be ignored.

Commercial/Recreational Allocations

While we would normally support allocation based on catch rather than landings and one that solely uses baseline data from the most recent timeframes, **we support Alternative 2a-4 for the following reasons.**

At present, the bluefish stock is overfished, SSB has declined considerably since 2009, and there is a very strong possibility that overfishing occurred in 2019 and 2020. From a management perspective, we believe that base years should include timeframes when the stock was at historically abundant levels. The additional inclusion of recent timeframes will inform how the fishery is currently being utilized. The stock was at its largest in the early 1980s and experienced surges in 1999, 2003, and 2006. Alternative 2a-4 includes catch data from all of those high biomass years as well as landings data from more recent timeframes.

We do not support a phase in because the percentages included in the sub-alternatives would seem to have little real effect—**thus, for efficiency's sake, we prefer Alternative 2b-1**.

Commercial Allocation to the State

We do not wish to offer opinions on the commercial fishery-focused alternatives within the document.

Rebuilding Plan

We strongly believe that the rebuilding plan is the most important component of this amendment. Legally, the Council must adopt a plan by November of this year and rebuild the stock by 2029. **We support Alternative 4c, which is based on the Council's risk policy and projected to rebuild the stock within five years.** This alternative is precautionary to the resource while still providing some short-term opportunity for harvest. The bluefish fishery thrives when the stock is healthy, and rebuilding quickly is critical.

Quota Transfer Provisions

As highlighted above, the recreational bluefish fishery is a predominantly catch-and-release fishery that derives significant value from fish left in the water. We do not support the practice of transferring unused "quota" from the recreational sector to the commercial sector. Recreational anglers choose to release the majority of bluefish, indicating that the primary value of the recreational fishery is in encountering them and catching them—and more often than not, releasing them. Viewing intentionally released fish as unused quota and then transferring it to the commercial sector negates the conservation value of voluntary release practices and manifests a fundamental misunderstanding of the fishery. Additionally, the revised MRIP data tells us that many of the past recreational-to-commercial transfers should not have even occurred.

Recreational anglers enjoy the opportunity to encounter this fish and should not be punished for releasing them. We view transfers in this fishery as a form of disincentivizing the practice of catch and release that ignores the benefits it provides.

For these reasons, we do not support either alternative, but rather recommend transfers be removed from the Bluefish Fishery Management Plan.

Management Uncertainty Alternatives

We recognize the need for all fishery sectors to be held accountable, and while we understand the challenges in anticipating and monitoring recreational catch, the uncertainties that such challenges engender should not negatively impact the commercial sector. While we would like to learn more about the specifics of how recreational uncertainty will be considered in reducing recreational harvest limits, **we support 6b, the post-sector split**. In addition, we recommend that the Council support human-dimensions research concerning bluefish angler preferences and values, which could better inform future management decisions and more accurately predict recreational effort, an area of particular uncertainty.

De Minimis Provisions

De minimis states land less than 0.1% of the coastwide commercial landings for the year before, and the FMP does not subject these to recreational management measures. It is our view that these states contribute so minimally to the coastwide stock that additional measures are futile in practice. **Thus, we prefer the status quo option: 7a.** However, as currently written *de minimis* status is determined solely by commercial landings; we would be remiss to not highlight the opportunity for states to "game" this system as conservation equivalency has been used in other fisheries.

Thank you for providing all of the relevant information on this amendment and for considering our input.

Sincerely,

Tony Friedrich
Vice President and Policy Director
American Saltwater Guides Association
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(202) 744-5013

Willy Goldsmith, Ph.D.
Executive Director
American Saltwater Guides Association
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[1] Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, April 19, 2021.
[2] Magnuson–Stevens Fishery Conservation and Management Act, 16 U.S.C. § 1802 (2012).

R.I. Party and Charter Boat Association
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www.rifishing.com

April 22, 2021

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

RE: Bluefish Amendment

Dear Dr. Moore,

On behalf of the 60 members of the R.I. Party and Charter Boat Association, I would like to submit the following comments regarding the joint MAFMC/ASMFC Bluefish Amendment.

Regarding the Goals and Objectives, we support the proposed changes to the FMP goals and objectives. While we feel strongly that all user groups need to be treated with respect, we also "Fair and Equitable" should be clearly defined as it may mean different things to different people. Providing access to recreational fishermen who wish to fish home to eat is important for our businesses to survive and thrive.

Section 5.0 Commercial/Recreational Allocations:

Included within the alternatives of other commercial/recreational allocation actions has been an alternative that considers maintaining the current baseline years updated with new MRIP catch estimates. In this action, that alternative was not included, but we feel it should be a consideration for the council/board. In consulting with staff, we understand that an alternative using a catch-based approach with the baseline years of 1981-1989 would result in an allocation or approximately 90% recreational and 10% commercial. We would support that methodology and allocation formula if considered. As a second choice we would support Alternative 2a-2 as described in the public hearing document.

Section 5.2 Allocation Phase-In:

We support Alternative 2b-2: Allocation change spread evenly over the same time as the rebuilding plan.

Section 6.0 Commercial Allocation to the States:

Several RIPCBA members are dual permitted and hold both for-hire and commercial bluefish permits which allow them to prosecute a commercial blue fishery on days when they do not have a recreational for-hire trip scheduled. We support updating the timeseries used to determine state allocations. We support Alternative 3a-3 to accomplish this.

Section 6.2 Commercial Allocation Phase-In:

We support Alternative 3b-2: Allocation change spread evenly over the same duration as the rebuilding plan.

Section 6.3 Commercial Triggers:

We do not support using commercial allocation triggers due to unnecessary complexity created by triggers.

Section 6.4.1 Minimum Default Allocations:

We support Alternative 3d-2 0.10% Minimum Default Allocation

Section 7.1 Rebuilding Plan Alternatives:

We believe rebuilding of Bluefish should in accordance with the ABC Control Rule, guided by the Council's risk policy. We support Alternative 4c. In addition, we are opposed to Alternative 4b, a constant catch strategy that would rebuild in 4 years. The restrictive catch limits under this alternative are not worth the 1-year faster rebuilding schedule.

Section 8.0 Quota Transfer Alternatives:

Its hard for us to support transfers of quota while the stock is undergoing rebuilding. We recommend a pause on any transfers until rebuilding is complete. After that we would support a bi-directional transfer program of some type. A cap would be needed for transfers and a program would need to be developed that accounts for the variability in MRIP catch estimates. We recommend removing all transfers from the FMP and initiating an action to develop a transfer plan for implementation when rebuilding is complete.

Section 9.0 Management Uncertainty Alternatives:

Alternative 6b Post Sector Split allows for a targeted approach to accounting for management uncertainty. We believe this is the best and most fair way to go, potentially incentivizing each sector to address management uncertainty where it becomes problematic.

Respectfully Submitted,

Capt. Rick Bellavance

Capt. Rick Bellavance, President
RI Party and Charter Boat Association

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April 22, 2021

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

RE: Bluefish Amendment

Dear Dr. Moore,

I am the owner/operator of the FV Priority Too, which holds a GARFO issued commercial fishing permit for bluefish. I have participated in this fishery for many years. I would like to offer the following comments related to the Bluefish allocation and rebuilding amendment.

Section 6.0 Commercial Allocation to the States:

I support updating the timeseries used to determine state allocations. I support Alternative 3a-3 as an appropriate way to allocate between states.

Section 6.2 Commercial Allocation Phase-In:

I support Alternative 3b-2: Allocation change spread evenly over the same duration as the rebuilding plan.

Section 6.3 Commercial Triggers:

I do not support using commercial allocation triggers due to unnecessary complexity created by triggers. They have not been used in this FMP in the past and I don't see a reason to start now.

Section 6.4.1 Minimum Default Allocations:

I support Alternative 3d-2 0.10% Minimum Default Allocation. If a fisherman from a state without allocation, harvests a few bluefish that fisherman should be able to bring them in and avoid discarding them. This alternative would give every state at least a little bit of allocation.

Section 7.1 Rebuilding Plan Alternatives:

I support rebuilding of Bluefish should in accordance with the ABC Control Rule, guided by the Council's risk policy. I support Alternative 4c. I do not support Alternative 4b, a constant catch strategy

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that would rebuild in 4 years. The restrictive catch limits under this alternative are not worth the 1-year faster rebuilding schedule.

Section 8.0 Quota Transfer Alternatives:

I support pausing any transfer of quota from one sector to another until the stock is rebuilt. During rebuilding, time should be given to develop a bi-directional transfer plan that meets the fisheries needs once stocks are rebuilt.

Section 9.0 Management Uncertainty Alternatives:

I support Alternative 6b Post Sector Split allows for a targeted approach to accounting for management uncertainty.

Respectfully Submitted,
Capt. Rick Bellavance

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401-741-5648
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COASTAL CONSERVATION ASSOCIATION

CONSERVATION & PROTECTION OF MARINE LIFE
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p 713.626.4234 | f 713.626.5852 | www.JoinCCA.org

April 23, 2021

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

Dear Dr. Moore,

Thank you for the opportunity to comment on the Bluefish Allocation and Rebuilding Amendment. Coastal Conservation Association is the nation's largest marine conservation group, with over 100,000 members in 19 state chapters.

Bluefish are a popular species whose often vicious strike have saved many a fishing trip. While not favored for their dining quality, they are prized for their fighting abilities. They are typically abundant, which increases the encounter rate, and indiscriminate feeders, which increases the strike rate. In short, they are a prototypical recreational species and should be managed as such. Many are released alive to strike and fight another day.

We have always had a serious concern over the arbitrary transfer of unused recreational quota to the commercial bluefish fishery. The original bluefish allocation was 87% recreational to 13% commercial, which was not adhered to very often. It was set based on past catch history and clearly shows the predominance of recreational catch in the fishery. We are opposed to the concept of transferring quota, especially for bluefish which, as mentioned earlier, are primarily a recreational species. As such, fish left in the water have value, possibly more value than dead in a cooler.

There should be some economic analysis that compares the value of bluefish to the commercial fishery and to the recreational fishery, including the value of released fish, as another metric to help with allocation. Past catch history should not be the primary, let alone sole, metric to decide allocations.

If the Council and Commission believe the commercial fishery should have more fish, then they should make the case for a change in allocation.

4.0 FISHERY MANAGEMENT PLAN GOALS AND OBJECTIVES
We are in favor of the revised goals and objectives, though we would prefer language acknowledging the bluefish's importance to the recreational fishery and managing for abundance.

5.0 COMMERCIAL/RECREATIONAL ALLOCATION ALTERNATIVES AND IMPACTS
We are in favor of option 2a-2, 89% recreational to 11% commercial, simply because the additional fish available to the fishery were generated from the new effort estimation – the Fishery Effort Survey.

We are also in favor of 2b-1 – the No Phase in option.

6.0 COMMERCIAL ALLOCATIONS TO THE STATES ALTERNATIVES AND IMPACTS
We have no comment on the state-by-state commercial allocations.

7.0 REBUILDING PLAN ALTERNATIVES AND IMPACTS
Due to the uncertainty with factors affecting rebuilding, either fishing mortality, environmental factors or a combination of the two. When coupled with the recent changes in MRIP, rebuilding may take longer than expected. We are in favor of 4d – Constant Fishing Mortality – 7-year rebuilding.

8.0 QUOTA TRANSFER ALTERNATIVES AND IMPACTS
We are in favor of removing this Alternative from consideration. While we know this is nigh impossible, we are in favor of changing the current status quo to eliminate the possibility of in season quota transfers from the recreational fishery to the commercial fishery

9.0 MANAGEMENT UNCERTAINTY ALTERNATIVES AND IMPACTS
We are in favor of 9a – No Action. The recreational sector has very limited ability to address the uncertainty associated with recreational catch. Management uncertainty should not be specific to each sector.

10.0 DE MINIMIS PROVISIONS ALTERNATIVES AND IMPACTS
We are in favor of 7c – letting the state decide recreational management measures.

Thank you for the opportunity to provide comment on these issues.

Sincerely,

Richen Brame
CCA Atlantic Fisheries Director

April 23, 2021

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

Dear Dr. Moore,

Thank you for the opportunity to comment on the Bluefish Allocation and Rebuilding Amendment. The Coastal Conservation Association North Carolina the largest marine conservation group in North Carolina with over 10,000 members and supporters across the state. We would like to add our support for comments already submitted by the CCA National office.

Bluefish are a popular species among recreational fishermen in North Carolina. Recent statistics from the NC DMF indicate it was the second most harvested fish by recreational anglers with over 2.7 million fish harvested in 2019. Many more were released alive to be encountered by anglers again another day. In short, they are a prototypical recreational species and should be managed as such.

We have always had a serious concern over the arbitrary transfer of unused recreational quota to the commercial bluefish fishery. The original bluefish allocation was 87% recreational to 13% commercial, which was not adhered to very often. It was set based on past catch history and clearly shows the predominance of recreational catch in the fishery. We are opposed to the concept of transferring quota, especially for bluefish which, as mentioned earlier, are primarily a recreational species. As such, fish left in the water have value, possibly more value than dead in a cooler.

There should be some economic analysis that compares the value of bluefish to the commercial fishery and to the recreational fishery, including the value of released fish, as another metric to help with allocation. Past catch history should not be the primary, let alone sole, metric to decide allocations.

If the Council and Commission believe the commercial fishery should have more fish, then they should make the case for a change in allocation.

4.0 FISHERY MANAGEMENT PLAN GOALS AND OBJECTIVES
We are in favor of the revised goals and objectives, though we would prefer language acknowledging the bluefish's importance to the recreational fishery and managing for abundance.

5.0 COMMERCIAL/RECREATIONAL ALLOCATION ALTERNATIVES AND IMPACTS
We are in favor of option 2a-2, 89% recreational to 11% commercial, simply because the additional fish available to the fishery were generated from the new effort estimation – the Fishery Effort Survey.

We are also in favor of 2b-1 – the No Phase in option.

6.0 COMMERCIAL ALLOCATIONS TO THE STATES ALTERNATIVES AND IMPACTS
We have no comment on the state-by-state commercial allocations.

7.0 REBUILDING PLAN ALTERNATIVES AND IMPACTS

Due to the uncertainty with factors affecting rebuilding, either fishing mortality, environmental factors or a combination of the two. When coupled with the recent changes in MRIP, rebuilding may take longer than expected. We are in favor of 4d – Constant Fishing Mortality – 7-year rebuilding.

8.0 QUOTA TRANSFER ALTERNATIVES AND IMPACTS

We are in favor of removing this Alternative from consideration. While we know this is nigh impossible, we are in favor of changing the current status quo to eliminate the possibility of in season quota transfers from the recreational fishery to the commercial fishery

9.0 MANAGEMENT UNCERTAINTY ALTERNATIVES AND IMPACTS

We are in favor of 6a – No Action. The recreational sector has very limited ability to address the uncertainty associated with recreational catch. Management uncertainty should not be specific to each sector.

10.0 DE MINIMIS PROVISIONS ALTERNATIVES AND IMPACTS

We are in favor of 7c – letting the state decide recreational management measures.

Thank you for the opportunity to provide comment on these issues.

Sincerely,

David A. Sneed, Executive Director
Coastal Conservation Association North Carolina
4809 Hargrove Road, Suite 123
Raleigh, NC 27616

Mid-Atlantic Fishery Management Council
800 North State Street. Suite 201
Dover, DE 19901

April 22, 2021

Dr Christopher Moore,

The North Carolina Watermen United is submitting these comments regarding the bluefish fishery.

We believe that, though the statistics for the Charter/Headboat Sector are accurate because they are now being sent electronically, and the Commercial statistics are accurately recorded at the fish houses where the catch is sold, the Recreational numbers are incomplete.

The information from the Recreational Sector is not valid because neither the surveys nor the mail-in forms completely show the true number of fishermen on private boats, the true number of on-shore anglers or the accurate number of fish that have been caught. Although the Marine Recreational Intercept Program (MRIP) has been in place for a few years, and is highly touted by Recreational fishing magazines, the program needs refinement and much better distribution, so that the actual number of fishermen and their catches is included.

Until we have better accounting from the Recreational Sector, including private boat catches and much more reliable surveys of the private on-shore anglers, it is just an arbitrary exercise to "make up" rules and regulations that effect all three Sectors of fishermen.

We are asking that MAFMC and ASFMC address this problem immediately so we can get accurate an accounting for the bluefish fishery.

Thank you for your attention to this matter.

Yours truly,

Perry Wood Beasley

Perry Wood Beasley
President, NCWU
252-706-0184

PWB: mm

cc: NC Division of Marine Fisheries

Board of Directors

Andrew Berry	Billy Maxwell
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DIRECTED SUSTAINABLE FISHERIES, INC.
A SALTWATER FISHERIES CONSULTING COMPANY

23 APR 2021

Re: BLUEFISH Allocation and Rebuilding Amendment Comment

To: Matt Seeley (mseeley@mafmc.org)

Thank you for the opportunity to provide comment on behalf of Directed Sustainable Fisheries, (DSF) clients concerned about current Bluefish Amendment Actions

Below is an image of the Bluefish Amendment Proposed Actions Overview, and the proposed actions, following that will be the intent of the DSF Bluefish written Comment;

The Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission (Commission) are seeking public comment on management options under consideration in the Bluefish Allocation and Rebuilding Amendment. This amendment contains alternatives to:

- Revise the fishery management plan (FMP) goals and objectives;
- Modify the bluefish allocations between the commercial and recreational sectors;
- Modify the commercial allocations to the states;
- Initiate a rebuilding plan;
- Revise the quota transfer processes;
- Revise how the FMP accounts for management uncertainty; and
- Revise the *de minimis* provisions in the Commission's FMP.

Comments may be provided at any of 5 virtual public hearings to be held between **March 24** and **April 8, 2021** or via written comment until **April 23, 2021.**

DSF provided oral comment on behalf of the Florida Atlantic Bluefish Fishery on 24 March 2021. Below will be DSF comments with the proposed actions, and maybe some general comment besides supporting the Florida Atlantic Bluefish fishery.

FMP Goals and Objectives Action 1,
DSF unfortunately agrees that the Bluefish FMP process has now tasked the two fishing sectors with probable allocation changes through these proposed management actions, using these current projections, since Status Quo does not seem to be a real option anymore for the present commercial sector allocations by States. This is after the past year or more of the public process of the commercial sector pushing against the new MRIP FES "currency" data shift from the old MRFSS "currency" that now inflates the previously already massive recreational sector estimated catch and mortality rates.

This current action of replacing the historic assessment inputs by changing current allocations between the commercial and recreational sectors has unfortunate consequences overall for the commercial sector of Florida, and elsewhere on the Atlantic coast for commercial interests due to

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DSF2009@AOL.COM

the new "MRIP FES currency" that we do not entirely agree with the estimated and inflated past catches by the recreational sector, yet it will take several years to verify or deny the veracity of the new method MRIP FES methods (currency) of estimating recreational catch of Bluefish. Meanwhile the commercial Bluefish seafood clients are denied past access, and the recreational "fishing public" gets to play with their Bluefish seafood, and release the majority of the greatly expanded estimated catch, many to die and become a modeled dead discard input in the future Bluefish stock assessments. For two years we have opposed the MRIP FES for various reasons, especially since it is not a real census of the catch like commercial fishing has been, it is only an estimate, albeit a greatly expanded recreational mortality going into the future that will always be a year to two years behind as to final annual catch, landings and release mortality. Even the Florida Fish & Wildlife Conservation leadership does not trust the results from the MRIP FES for many of the Florida fish stocks.

Sector (Commercial/Recreational) Allocations Action 2,
For sector allocation Set 2a, we would prefer to stay with Alternative 2a-1, Status Quo 83% Recreational and 17% Commercial. With that said managers do not seemed incline to help the commercial maintain the percentage previously allocated, so our secondary choice will be Alternative 2a-5, 84% Recreational and 16% Commercial.

Alternative Set 2b is the Allocation Change Phase-In as worded in the Bluefish public hearing document, then as long as Action 1 unfolds as we desire, then no-phase in, Alternative 2b-1, Status Quo should be okay. Some of this will depend on the future allocations and which rebuilding plan duration choice is implemented.

Commercial Allocations to the States Action 3,
Florida Bluefish interests would prefer Alternative 3a-1 of Status Quo, (1981-1989) that maintains the Florida current commercial percentage of 10.04%. Since managers will probably not agree to that choice, then our back up will be Alternative 3a-4 that uses half of 1981-1989 and half of 2009-2018 to achieve 8.59% that keeps Florida commercial Bluefish allocation closest to the past allocation of Status Quo.

Alternative Set 3b-1 No phase-in Status Quo is the best commercial choice as long as the maximum two allocations can be available to Florida commercial fishermen.

Alternative Set 3c-1 of no Quota trigger, Status Quo has been the Bluefish FMP norm, and we support the continued status quo.

Alternative Set 3d-1 of No Minimum Default Allocation Status Quo for Bluefish is probably the best choice, unless one of the two other allocations work out best for states like Georgia and South Carolina that doesn't harvest much commercial Bluefish historically.

Rebuilding Plan Action 4,
Alternative Set 4-d for Constant Fishing Mortality for a 7-year Rebuilding Plan is the favored choice by the Florida Atlantic Bluefish fishing industry. This will reveal how well the Bluefish population status is unfolding for both fishing sectors.

Transfers Action 5.
We support the continued inclusion of Sector Transfer Provisions as a tool to keep in the FMP for potential future use. Alternative Set 5a-1 No Action/Status Quo is the Florida choice, though in our commercial history, we have never required a transfer to Florida, but Florida did benefit northern states in the past by giving transfers to help their fishing interests.

Management Uncertainty Action 6.
Since Figure # 21 in the public hearing document illustrates some of the new FMP choices, with suggestions including the transfers that could in the future get activated in both directions for commercial and recreational potential utilization. Also, developing types of a census approach for the for-hire and private recreational fisheries in all the states that catch and land Bluefish. We can support Alternative Set 6-b for Post-Sector split, and we can only hope that Scientific, Commercial and Recreational Uncertainties can be reduced in the future with better data collection.

De Minimis Provisions Action 7.
Atlantic Florida Recreational fishing interests for Bluefish have a robust fishery in state and federal waters that depends on certain migrations based on available food sources for the Blues usually affected by water temperatures and the weather patterns that sometimes have Bluefish being pulled further or closer to the beach creates some variations on annual catch & landings. Particularly the past two falls and winters have impacted a lot of fishing efforts from all sectors since 2019. We cannot control the effects of Mother Nature on Bluefish, only the catch. Managers are in charge, and for now we will simply choose Alternative Set 7-a No Action/Status Quo, and let management make these final choices after recreational inputs.

General,
It is still our desire to see ultimately a census gathering effort for both the for-hire and private recreational sectors to provide these data, instead of depending only on a MRIP FES that is an estimate of an estimate that hurts the commercial sector with these actions of this proposed FMP.

Thank you, again, and we hope you help the Florida commercial Bluefish fishery, and not harm its recent positive growth over the past decade.

Rusty

Russell Howard Hudson, President
Directed Sustainable Fisheries, Inc. (DSF)

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Saltwater Fisheries Consultant, Shark Specialist
Deep-Sea Fishing Expert and Shrimp Boat Captain
Retired 100-ton United States Coast Guard (USCG) Licensed Sea Captain
Recreational, For-Hire & Commercial Fishing Life Experience, 1958-2021
Sixth Generation Waterman from Central Florida (FL) East Coast
Seafood Coalition (SFC) member
American Elasmobranch Society (AES) member 2004-2021
Atlantic Coastal Cooperative Statistics Program (ACCSP) Advisory Committee FL member
ACCSP Biological Review Panel (BRP) member
ACCSP Bycatch Prioritization Committee (BPC) member
Atlantic States Marine Fisheries Commission (ASMFC) Coastal Shark (CS) Advisory Panel (AP) FL Commercial & For-hire recreational member [former Chair of CS AP]
ASMFC Bluefish AP FL Commercial member
IWMC World Conservation Trust Vice-President – Marine Fish Species, especially Sharks
National Marine Fisheries Service (NMFS) Highly Migratory Species (HMS) AP Commercial Shark member 2019-2021
NMFS HMS SouthEast Data, Assessment and Review (SEDAR) AP Pool member 2021-2026
South Atlantic Fishery Management Council (SAFMC) SEDAR AP Pool member no term limits
SAFMC Fisheries Citizen Science Program Participant 2016-2021
SAFMC Mackerel-Cobia AP FL Commercial member 2018-2021
SAFMC Snapper-Grouper (SG) AP FL Commercial member 2015-2021
SAFMC System Management Plan (SMP) Workgroup FL Commercial member 2018-2021
SAFMC Marine Protected Area (MPA) Expert Work Group (EWG) participant 2012-2013
Former SAFMC MPA AP FL Commercial member
Former NMFS Atlantic Large Whale Take Reduction Team FL participant (ALWTRT)
Former NMFS Bottlenose Dolphin Take Reduction Team FL participant (BDTRT)
Participant, observer and/or contributor to US coastal shark stock assessments during 1992, 1996, 1998, 2001, 2002, 2005, 2006, 2007, 2010-2015, 2017 & 2019-2021.
Participant, observer and/or contributor SEDAR 11 (Large Coastal Sharks), 13 (Small Coastal Sharks), 16 (King Mackerel), 19 (Red Grouper/Black Grouper), 21 (Large Coastal Sharks/Small Coastal Sharks), 24 (Red Snapper), 25 (Black Sea Bass/Golden Tilefish), 28 (Spanish Mackerel/Cobia), 29 (Gulf Blacktip Sharks), 32 (~~Gray Triggerfish~~/Blueline Tilefish), 34 (Atlantic Sharpnose Sharks/Bonnethead Sharks), 36 (Snowy Grouper), 38 (King Mackerel), 39 (Smoothhound Sharks), 41 (Atlantic Red Snapper/~~Gray Triggerfish~~), 50 (Blueline Tilefish), 53 (Red Grouper), 54 (Sandbar Sharks), 56 (Black Sea Bass), 65 (Atlantic Blacktip Sharks), 66 (Golden Tilefish) 73 (Atlantic Red Snapper) and SEDAR 78 (Atlantic Spanish Mackerel).



April 23, 2021

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

Dear Dr. Moore,

On behalf of the recreational fishing industry, and east coast anglers, we submit the following comments to the Mid-Atlantic Fisheries Management Council (MAFMC) and the Atlantic States Marine Fisheries Commission (ASMFC) on the Bluefish Allocation and Rebuilding Amendment.

Recreational anglers and the sportfishing industry recognize that a healthy bluefish population and fishery is critical to the east coast outdoor economy and is a significant driver of angler engagement and participation in coastal states from Maine through Florida. As a sportfish, bluefish provide fishing opportunities across all modes of the recreational sector making it an important target for a diverse and growing population of recreational anglers.

Historically, management of the bluefish fishery has been exceptionally stable until the 2019 operational assessment concluded that bluefish were overfished and experiencing overfishing during a significant part of the time series. These results were based mainly on the inclusion of updated MRIP catch data and represent a significant shift from the previous understanding of stock status. Unfortunately, this means that a rebuilding plan is now needed to return the bluefish population to a healthy status.

Furthermore, managers are currently using the new MRIP data in every aspect of fisheries management except for allocation. National standard 2 guides the use of best scientific information available in management decisions. Therefore, we recommend the MAFMC and ASMFC adjust the recreational and commercial allocation splits for the bluefish fishery using the new MRIP data which has been deemed best scientific information available.

To help assist the MAFMC and ASMFC in responding to these substantial changes in stock status and the need to revisit allocation, we submit the following comments on the Bluefish Allocation and Rebuilding amendment.

Goals and Objectives
We support the revised goals and objectives but recommend adding an objective under Goal 1 about the importance of maintaining management stability in the bluefish fishery.

Commercial/Recreational Allocations:
We support Option 2a-3: 87% recreational, 13% commercial.

Justification: This option uses the most recent 20 years of catch data (1999-2018) which is a broad timeframe that better reflects ongoing changes in the overall fishery. Using catch data as the basis for

allocation will correct the current mismatch that exists where landings data are used for allocation, but catch data are used for accounting. Additionally, the recreational sector remained within its recreational harvest limit over the entire 20-year timeframe (1999-2018) providing a fair and equitable basis for using these years in the allocation calculation.

Commercial/Recreational Allocation Phase In

We support Option 2b-1: No Phase In.

Justification: The 87% recreational, 13% commercial allocation change does not need a phase in period because it differs by only 4% from the current allocation split. We also believe it is necessary to implement the allocation change quickly to avoid any further recreational restrictions which could occur under a phased in approach.

Rebuilding Plan Alternatives

We support Option 4d: use constant fishing mortality to rebuild in a 7-year timeframe.

Justification: It is uncertain whether fishing mortality or environmental conditions will have more of an impact on rebuilding the bluefish population. Although maintaining fishing mortality at the target level will be of paramount importance, even the stock assessment scientists expressed concern with the recent changes in recreational catch data making it difficult to determine a rebuilding timeframe with certainty. Furthermore, it is difficult to understand that over the entire time series (1985-2018), bluefish spawning stock biomass (SSB) has never reached the SSB target. We value the health of the bluefish stock and understand that rebuilding it has measurable benefits to our industry, but express continued concern regarding choosing an overly ambitious rebuilding timeframe that requires rebuilding to a level that has never been achieved.

Also, the Draft Amendment states that if the stock is unable to rebuild in a chosen timeframe that NOAA Fisheries technical guidance on MSA National Standard 1 recommends that the rebuilding fishing mortality proxy (F) be set at 75% of the target F. This means that if the selected rebuilding plan is demonstrating difficulty in achieving the target on time, F may be further decreased to achieve a rebuilt stock.

Given the uncertainty associated with the rebuilding timeframe projections and the potential for further restrictions if the projections are inaccurate, we strongly recommend a longer rebuilding timeframe to provide the greatest opportunity to successfully rebuild bluefish.

Quota Transfers

We support Option 5a-2: allow for optional bi-directional transfers with Option 5B-2 a 10% transfer cap.

Justification: We do not support quota transfers between sectors while the population is under a rebuilding plan. Additionally, we do not support quota transfers between sectors until both the for hire and private modes have equal management measures. Because eliminating quota transfers is not a management alternative in the document, if quota transfers are allowed, they need to be bi-directional with a 10% transfer cap.

Management Uncertainty
We support Option 6a: no action/status quo.

Justification: The recreational sector has no ability to address the uncertainty associated with MRIP catch estimates, but we continue to advocate for better catch reporting systems. Additionally, the public hearing document does not provide any information on the level of uncertainty that may be applied through Alternative 6b or how such an application of management uncertainty would impact recreational regulations for this fishery. Therefore, we believe management uncertainty, which is controlled by the managers not the stakeholders, should not be specific to each sector.

Thank you for the opportunity to comment.

Sincerely,

Michael Waine
Atlantic Fisheries Policy Director
American Sportfishing Association

Jeff Angers
President
Center for Sportfishing Policy

Chris Horton
Senior Director of Fisheries Policy
Congressional Sportsmen's Foundation

Clay Crabtree
Director of Federal Government Relations
National Marine Manufacturers Association

Jim Donofrio
President
Recreational Fishing Alliance

P.O. Box 1230
Marshfield, MA 02050
www.stellwagenbank.org

April 23, 2021

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

RE: Bluefish Amendment

Dear Dr. Moore:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA) whose membership includes the for hire fleet, recreational anglers and commercial fisherman that fish the state and federal waters off the coast of Massachusetts and abutting states, we offer the following comments to the Mid-Atlantic Fisheries Management Council (MAFMC) and Atlantic States Marine Fisheries Commission (ASMFC), Bluefish Allocation and Rebuilding Amendment.

A healthy bluefish population and fishery is critical to anglers and the entire blue economy of Massachusetts and the east coast. Bluefish provide fishing opportunities across a cross section of the recreational community making it an important target for a diverse and growing population of anglers.

The management of the bluefish fishery has been stable until the 2019 operational assessment concluded that bluefish were overfished and experiencing overfishing. This is primarily a result of updated MRIP data. Consistent with National Standard 2, the use of the best scientific information available and/or updated MRIP data is required to manage the fishery. As a result, the SBCBA recommends that the MAFMC and ASMFC adjust the recreational and commercial allocation for the bluefish fishery using the new MRIP data consistent with the recommendations summarized below.

Commercial Recreational Allocations:
Recommend Option 2a-3: 87% recreational, 13% commercial.

This option uses the most recent 20 years of catch data (1999-2018) that reflects the ongoing change in the overall fishery over time. Using catch

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data as the basis for allocation will correct the current mismatch that exists where landings data are used for allocation, but catch data are used for accounting. It should also be noted that the recreational sector has remained within its recreational harvest limit over the entire 20-year timeframe (1999-2018) providing a fair and equitable basis for using these years in the allocation calculation.

Commercial/Recreational Allocation Phase In
Recommend Option 2b-1: No Phase In.

A phase in period is not recommended since the 87% recreational and 13% commercial allocation differs by only 4% from the current allocation split. The SBCBA believes it is necessary to implement the allocation change quickly to avoid any further recreational restrictions which could occur under a phased in approach.

Rebuilding Plan Alternatives
Recommend Option 4d: use constant fishing mortality to rebuild in a 7-year timeframe.

MSA section 304(e)4 details the requirements for rebuilding overfished fisheries and allows for exemptions to the "*as short as possible*" requirement to account for the "*interaction of the overfished stock of fish within the marine ecosystem.*" As a result, the SBCBA is disappointed that a 10-year rebuilding option was not selected to rebuild the fishery. It is uncertain whether fishing mortality or environmental conditions will have more of an impact on rebuilding the bluefish population. Maintaining fishing mortality at the target level will be very important. It should be noted that during the entire time series (1985-2018), the bluefish spawning stock biomass (SSB) has never reached the SSB target. The SBCBA has continued concern associated with selecting an overly ambitious rebuilding timeframe that requires rebuilding to a level that has never been achieved.

As a result of the uncertainty associated with the rebuilding timeframe projections and the potential for further restrictions if the projections are inaccurate, the SBCBA strongly recommends a longer rebuilding timeframe to provide the greatest opportunity to successfully rebuild bluefish.

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www.stellwagenbank.org

Quota Transfers

Recommend Option 5a-2: allow for optional bi-directional transfers with Option 5B-2 a 10% transfer cap.

The SBCBA does not support quota transfers between sectors while the population is under a rebuilding plan. If quota transfers are allowed, the SBCBA recommends a bi-directional transfer with a 10% transfer cap.

Management Uncertainty

Recommend Option 6a: no action/status quo.

The recreational sector has no ability to address the uncertainty associated with MRIP catch estimates. The greatest proportion of uncertainty in the recreational bluefish fishery is associated with the estimates of discarded fish. Estimates of discards rely on angler recall which inherently contains more uncertainty.

The public hearing document does not provide information on the level of uncertainty that maybe applied through Alternative 6b or how such an application of management uncertainty would impact recreational regulations. As a result, the SBCBA recommends that the management of uncertainty be conducted by the fishery managers not the stakeholders across all sectors.

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

Very truly yours,

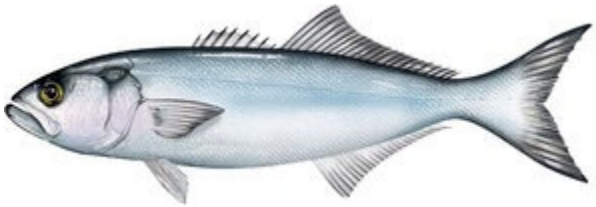
Capt. Mike Pierdinock

Capt. Mike Pierdinock
SBCBA, President
sbcbamp@gmail.com

Cc: Dan McKiernan, MassDMF
Ron Amidon, MassF&G

Atlantic Bluefish Allocation and Rebuilding Amendment

PUBLIC HEARING DOCUMENT



February 2021

(Revised in May 2021)

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

1.0 CONTENTS

2.0 INSTRUCTIONS FOR PROVIDING PUBLIC COMMENTS

The Mid-Atlantic Fishery Management Council (MAFMC or Council) and the Atlantic States Marine Fisheries Commission (ASMFC or Commission) will collect public comments on the Bluefish Allocation and Rebuilding Amendment during 5 public hearings to be held from March 24th through April 8th, and during a written public comment period extending until April 23rd. Written comments may be sent by any of the following methods:

1. **Online** at https://www.mafmc.org/comments/bluefish-allocation-rebuilding-amendment
2. **Email** to the following address: mseeley@mafmc.org
3. **Mail or Fax** to:

   Chris Moore, Ph.D., Executive Director
   Mid-Atlantic Fishery Management Council
   800 North State Street, Suite 201
   Dover, DE 19901
   FAX: 302.674.5399

If sending comments through the mail, please write "Bluefish Allocation and Rebuilding Amendment" on the outside of the envelope. If sending comments through email or fax, please write "Bluefish Allocation and Rebuilding Amendment" in the subject line.

All comments, regardless of submission method, will be compiled for review and consideration by both the Council and Commission. **It is not necessary to separately submit comments to the Council and Commission or submit the same comments through multiple channels.**

Interested members of the public are encouraged to attend any of the following 5 public hearings and to provide oral or written comments at these hearings.

Date and Time	State or Regional Grouping	
Wednesday, March 24 6:00 - 8:00 p.m.	**North Carolina, South Carolina, Georgia, and Florida**	Chris Batsavage (NC), 252-241-2995 Mel Bell (SC), 843-953-9007 Doug Haymans (GA), 912-264-7218 Hannah Hart (FL), 321-861-5058
Thursday, March 25 6:00 - 8:00 p.m.	**Delaware, Maryland, Potomac River Fisheries Commission, and Virginia**	John Clark (DE), 302-739-9914 Michael Luisi (MD), 443-758-6547 Martin Gary (PRFC), 804-456-6935 Ellen Bolen (VA), 757-247-2269
Tuesday, March 30 6:00 - 8:00 p.m.	**Connecticut and New York**	Justin Davis (CT), 860-447-4322 Maureen Davidson (NY), 631-444-0483
Thursday, April 1 6:00 - 8:00 p.m.	**Maine, New Hampshire, Massachusetts, Rhode Island**	Megan Ware (ME), 207-446-0932 Cheri Patterson (NH), 603-868-1095 Nichola Meserve (MA), 617-626-1531 Nicole Lengyel (RI), 401-423-1940

Date and Time	State or Regional Grouping	
Thursday, April 8 6:00 - 8:00 p.m.	**New Jersey**	Joseph Cimino (NJ), 609-748-2020

For additional information and updates, please visit: https://www.mafmc.org/actions/bluefish-allocation-amendment. If you have any questions, please contact either:

Council contact
Matthew Seeley, Mid-Atlantic Fishery Management Council
mseeley@mafmc.org
302-526-5262

Commission contact
Dustin Colson Leaning, Atlantic States Marine Fisheries Commission
dleaning@asmfc.org
703-842-0714

3.0 INTRODUCTION AND AMENDMENT PURPOSE

3.1 Amendment Purpose, Next Steps, and Decision Trees

The purpose of this amendment is to consider modifications to the Fishery Management Plan (FMP) goals and objectives, current allocations between the commercial and recreational sectors, current commercial allocations to the states, initiate a rebuilding plan, revise the quota transfer processes, revise how the FMP accounts for management uncertainty, and revise *de minimis* provisions in the Commission's plan.

The current sector-based and commercial state-to-state allocations were set in 2000 using data from 1981-1989 and have not been revised since that time. Recreational catch and harvest data are provided by the Marine Recreational Information Program (MRIP). In July 2018, MRIP released revisions to their time series of catch and harvest estimates based on adjustments for a revised angler intercept methodology (used to estimate catch rates) and a new effort estimation methodology (namely, a transition from a telephone-based effort survey to a mail-based effort survey). These revisions resulted in much higher recreational catch estimates compared to previous estimates, affecting the entire time series of data going back to 1981. These data revisions have management implications due to the fixed commercial/recreational allocation percentages defined in the FMP. These allocation percentages do not reflect the current understanding of the recent and historic proportions of catch and landings from the two sectors. Since these allocation percentages are defined in the Council and Commission FMPs, they cannot be modified without an FMP amendment. This amendment will consider whether the allocations are still appropriate and meeting the objectives of the FMP. In reviewing/adjusting the allocations, the need for transfers may be reduced, however, improvements to the transfer processes will also be reviewed.

Bluefish was deemed overfished with overfishing not occurring as a result of the 2019 Operational Assessment. Therefore, the Council is mandated to initiate a rebuilding plan within two years of notice by the Greater Atlantic Regional Fisheries Office (GARFO) Regional Administrator. Under a rebuilding plan, the stock will be considered rebuilt once spawning stock biomass reaches the target biomass (spawning stock biomass maximum sustainable yield proxy) of 198,717 mt. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires the overfished stock to be rebuilt within ten years once the regional office notifies the Council of the overfished

state. Under the current amendment timeline, the rebuilding plan would be implemented at the beginning of 2022.

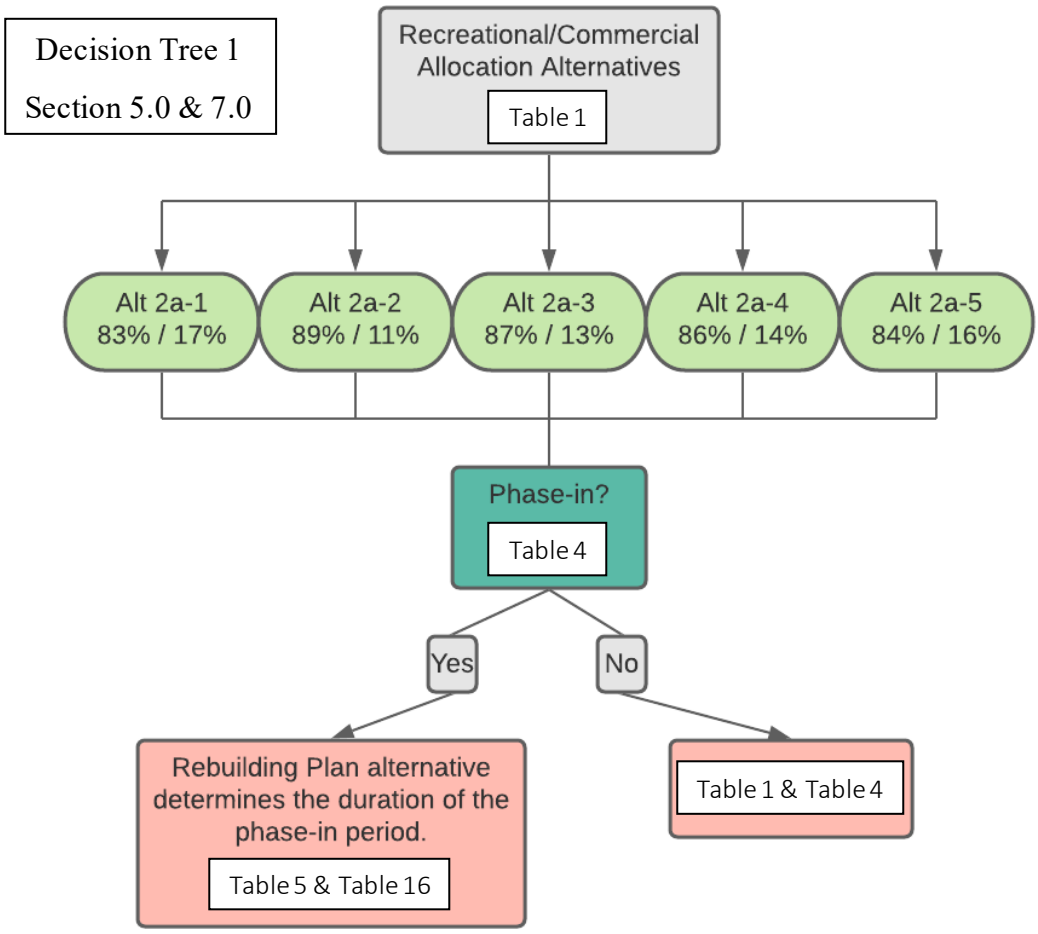
Several other issues identified during scoping for this action were considered by the Council and Board for inclusion in this amendment but have since been removed. Some of those issues will be taken up through other initiatives or actions. More information on removed issues is available in past meeting documents and meeting summaries for this amendment, available at: https://www.mafmc.org/actions/bluefish-allocation-amendment.

What Happens Next?

This document supports a series of public hearings and a public comment period scheduled to take place during [March/April 2021]. Following public hearings, written and oral comments will be compiled and provided to the Council and Board for review. These comments will be considered prior to taking final action on the amendment, which is tentatively scheduled for May/June 2021. The Council's recommendations are not final until they are approved by the Secretary of Commerce through the National Marine Fisheries Service, so the timing of full implementation of this action will depend on the federal rulemaking timeline. This rulemaking process is expected to occur in 2021, with the intent for revised measures (if applicable) to be effective at the start of the 2022 fishing year.

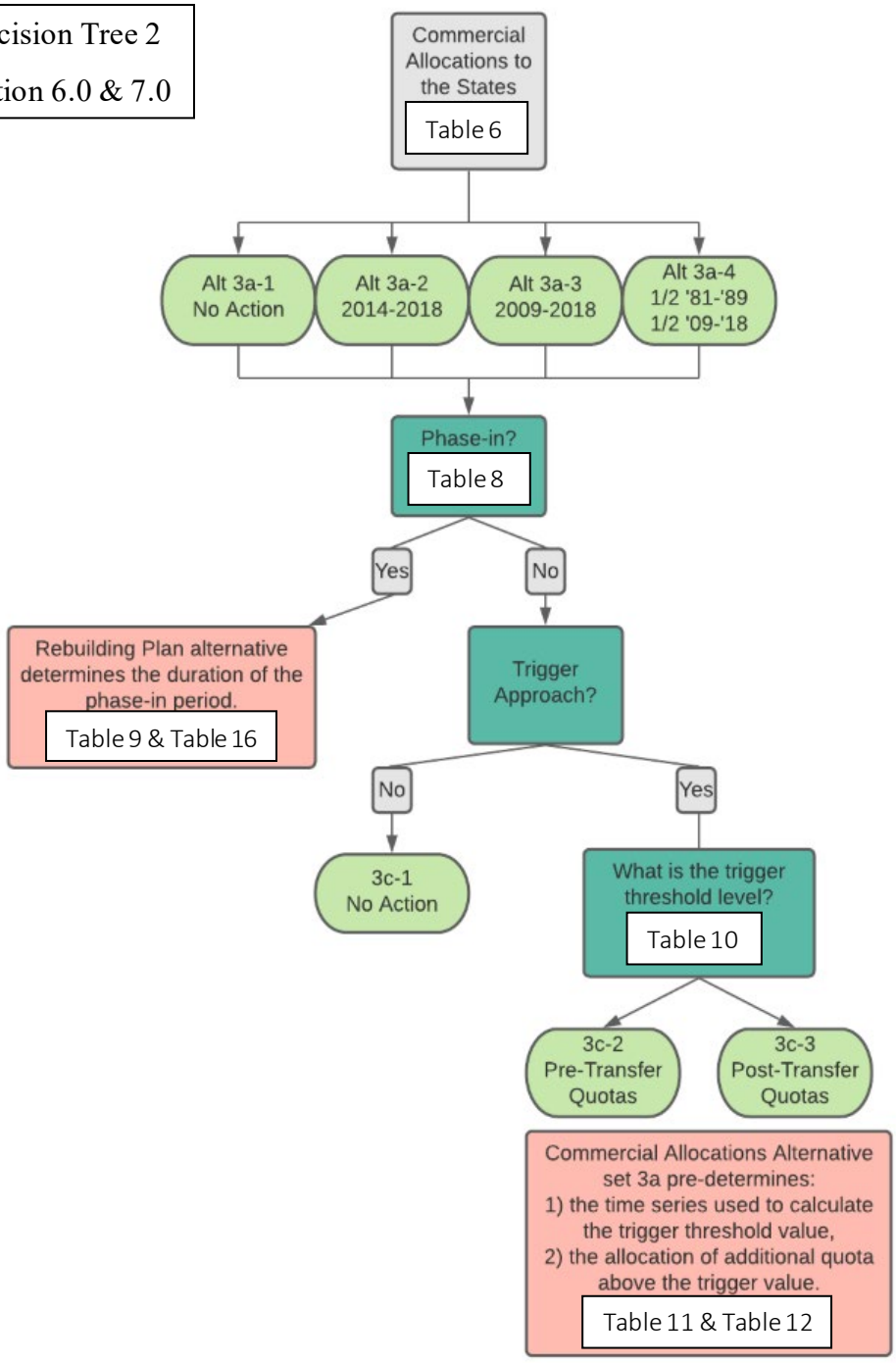
Decision Trees

In some instances, decisions in one section will dictate how other alternative sets should be interpreted. Decision trees 1-3 are included to help guide public comment on those sections that are tied together (i.e., Sections 5, 6, and 7). For example, the preferred rebuilding alternative will have a specified duration. That duration will dictate the amount of years allocation changes will be phased-in, should phase-in alternatives be a preferred alternative. **Note: Click the table number to jump to that table.**


Decision Tree 1
Section 5.0 & 7.0
Recreational/Commercial Allocation Alternatives
Table 1
Alt 2a-1
83% / 17%
Alt 2a-2
89% / 11%
Alt 2a-3
87% / 13%
Alt 2a-4
86% / 14%
Alt 2a-5
84% / 16%
Phase-in?
Table 4
Yes
No
Rebuilding Plan alternative determines the duration of the phase-in period.
Table 5 & Table 16
Table 1 & Table 4

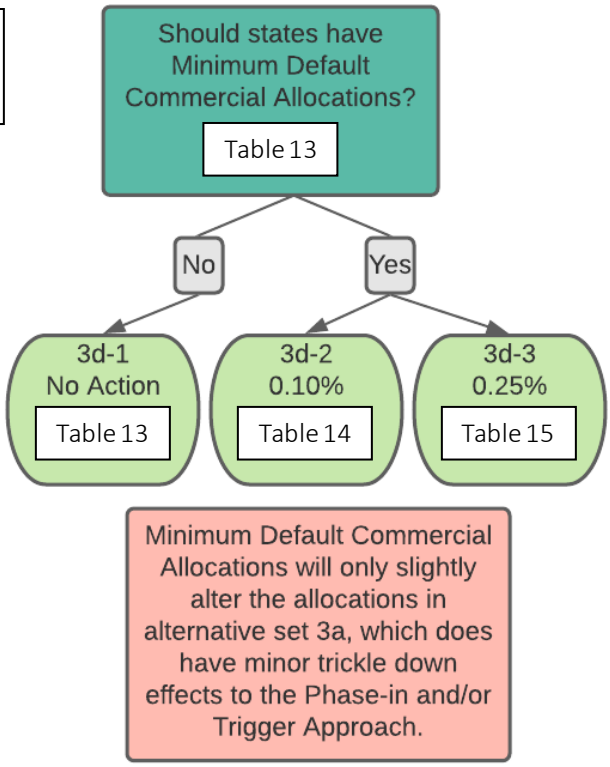
Decision Tree 2

Section 6.0 & 7.0



Decision Tree 3

Section 6.4



4.0 FISHERY MANAGEMENT PLAN GOALS AND OBJECTIVES

The Council and Board are considering revisions to the existing FMP goals and objectives for bluefish through this amendment. The no action/status quo option keeps the existing FMP goals and objectives that were developed in 1991. The proposed FMP goals and objectives include revisions based on input provided by the public, bluefish advisory panel members, and Council and Board members.

Please note: While these revisions are not included as an explicit alternative within this amendment, the proposed revisions are not final until approved by the Council and Board. **The Council and Board are seeking feedback from the public on the proposed revisions during the public hearing process.**

4.1.1 Current Fishery Management Plan Goals and Objectives

Goal: Conserve the bluefish resource along the Atlantic coast.

Objective 1: Increase understanding of the stock and of the fishery.
Objective 2: Provide the highest availability of bluefish to U.S. fishermen while maintaining, within limits, traditional uses of bluefish.
Objective 3: Provide for cooperation among the coastal states, the various regional marine fishery management councils, and federal agencies involved along the coast to enhance the management of bluefish throughout its range.
Objective 4: Prevent recruitment overfishing.
Objective 5: Reduce the waste in both the commercial and recreational fisheries.

4.1.2 Impacts of Maintaining Current Fishery Management Plan Goals and Objectives

Under the status quo option, the Bluefish FMP goals and objectives would remain unchanged. According to the summary of public comments submitted during the scoping hearing process, only 10% of submitted comments were in support of the status quo. More than half (55%) of submitted comments were in favor of re-evaluating and/or revising the FMP goals and objectives. About 13% of comments did support maintaining one or more of the current goals and objectives, but not the entirety of those listed under the status quo option.

4.2.1 Proposed Fishery Management Plan Goals and Objectives

Goal 1: Conserve the bluefish resource through stakeholder engagement to maintain sustainable recreational fishing and commercial harvest.

Objective 1.1: Achieve and maintain a sustainable spawning stock biomass and rate of fishing mortality.
Objective 1.2: Promote practices that reduce discard mortality within the recreational and commercial fishery.
Objective 1.3: Maintain effective coordination between the National Marine Fisheries Service, Council, Commission, and member states by promoting compliance and to support the development and implementation of management measures.
Objective 1.4: Promote compliance and effective enforcement of regulations.
Objective 1.5: Promote science, monitoring, and data collection that support and enhance effective ecosystem-based management of the bluefish resource.

Goal 2: Provide fair and equitable access to the fishery across all user groups throughout the management unit.

Objective 2.1: Ensure the implementation of management measures provides fair and equitable access to the resource across to all groups along the coast.
Objective 2.2: Consider the economic and social needs and priorities of all groups that access the bluefish resource in the development of new management measures.
Objective 2.3: Maintain effective coordination with stakeholder groups to ensure optimization of economic and social benefits.

4.2.2 Impacts of Revising the Fishery Management Plan Goals and Objectives

The proposed changes and additions to the Bluefish FMP goals and objectives are anticipated to have neutral to positive social impacts [1] to bluefish fishery stakeholders. The majority of comments submitted during the scoping process were in support of revising the goals and objectives altogether and an even larger majority supported revising at least some of the current goals and objectives. The proposed Goal 1 commits to stakeholder engagement in the interest of maintaining sustainable recreational fishing and commercial harvest. A commitment to stakeholder engagement is likely to improve attitudes about the FMP among bluefish fishery stakeholders. The proposed Goal 2 ensures fair and equitable access to the fishery across all user groups. According to Crew Survey results in 2012 and 2018, the majority of commercial crew and hired captains reported that they believe the regulations in their primary fishery are too restrictive and fewer than half agree that the fines associated with breaking the rules are fair. For at least the commercial harvest user group, the proposed Goal 2, ensuring fair and equitable access, would likely have positive impacts on their attitudes towards the FMP and its objectives. There may be positive or negative social impacts to the various recreational angling sectors as the Council and Board consider mode-specific regulations.

5.0 COMMERCIAL/RECREATIONAL ALLOCATION ALTERNATIVES AND IMPACTS

Section 5.1 describes the alternatives for commercial and recreational allocations for bluefish, along with their expected impacts. The range of allocation alternatives includes options that would maintain the current allocations, as well as options to revise allocations based on updated data using modified base years. Section 5.2 describes options to phase in any allocation changes over multiple years, and the expected impacts of these phase-in provisions.

Under the current FMP for bluefish, the Acceptable Biological Catch (ABC) equals the fishery level Annual Catch Limit (ACL), which is then divided into a commercial and recreational Annual Catch Target (ACT) based on the allocation percentages defined in the FMP. Sector-specific expected discards are subtracted from the sector-specific ACTs to derive a commercial quota and a Recreational Harvest Limit (RHL).

Commercial discards are considered negligible within the bluefish fishery (NEFSC 2015). Recreational discards are estimates based on the MRIP B2s (released alive). Managers assume a 15% mortality rate on the released alive fish (NEFSC 2015). The number of fish are converted to

[1] Social impacts are impacts that directly affect the human communities with focus outside of the economics (Appendix A).

weight by multiplying by the average weight of landed fish coastwide in a given year. This approach assumes that the weight of released fish is equal to the weight of landed fish.

Aside from the status quo option (alternative 2a-1), the following approaches revise the allocation percentages based on modified base years or different data sets.

5.1 Commercial/Recreational Allocations

5.1.1 Commercial/Recreational Allocation Alternatives

Table 1 lists the alternatives under consideration for the commercial and recreational bluefish allocation percentages based on both catch and landings data. The current allocations for bluefish are based on commercial and recreational landings data from 1981-1989 that have not been updated with a renewed understanding of historic fishery performance. The current allocations for bluefish are represented by the no action/status quo alternative (alternative 2a-1, highlighted in green in Table 1).

Table 1: Bluefish commercial/recreational allocation alternatives. The current allocations are highlighted in green.

Allocation Percentages	
Alternative	**Basis**
2a-1: 83% recreational, **17%** commercial	No action/status quo (1981-1989 landings data)
2a-2: 89% recreational, **11%** commercial	Multiple approaches: 2014-2018 and 2009-2018 catch data
2a-3: 87% recreational, **13%** commercial	1999-2018 catch data
2a-4: 86% recreational, **14%** commercial	Multiple approaches: 1981-2018 catch data; 2014-2018 and 2009-2018 landings data
2a-5: 84% recreational, **16%** commercial	Multiple approaches: 1981-2018 and 1999-2018 landings data

5.1.2 Impacts of Commercial/Recreational Allocation Alternatives

Alternatives 2a-2 through 2a-5 result in lower commercial allocations and higher recreational allocations compared to the no action/status quo alternative (2a-1). Table 2 compares the commercial and recreational allocation alternatives by displaying the percent change in allocation share from the status quo alternative. The relative percent change to each sector's allocation differs notably. Since the commercial sector's share of the fishery-level ACL is much smaller by comparison to the recreational sector's share, any changes to the allocation percentages have a larger impact on the commercial sector relative to the impact on the recreational sector.

Table 2: Percent change (in green and red) of commercial and recreational allocations for each alternative relative to status quo. The grey boxes refer to the status quo alternative.

Alternative	2a-1	2a-2	2a-3	2a-4	2a-5
Proposed Recreational Allocation	83%	89%	87%	86%	84%
% Change from Status Quo	0%	+7%	+5%	+4%	+1%
Proposed Commercial Allocation	17%	11%	13%	14%	16%
% Change from Status Quo	0%	-35%	-24%	-18%	-6%

An increase in the recreational allocation would result in increased RHLs compared to the current allocations. RHLs are tied to recreational measures such as possession limits, fish size restrictions, and open/closed seasons. These measures are adjusted as needed to allow the RHL to be achieved, but not exceeded. Depending on the magnitude of the increase, an increased recreational allocation may not allow for liberalized recreational management measures compared to recent years in all cases. In some cases, recreational restrictions may still be needed if the allocation increase is not enough to account for recent increases in the MRIP harvest estimates.

Liberalizing or restricting recreational measures can impact angler access to bluefish. Increased access could take the form of more fish to take home (under higher possession limits and/or lower minimum fish sizes) and more opportunities to target the species (under longer open seasons), while decreased access could mean the ability to retain fewer fish and reduced opportunities to target the species. This can affect angler satisfaction, revenues for for-hire businesses (e.g., by impacting demand for for-hire trips), and revenues for support businesses such as bait and tackle shops.

With respect to the commercial sector, alternatives other than status quo will result in lower quotas relative to status quo with impacts described below.

Social Impacts

Alternative 2a-1 is anticipated to have positive social impacts for commercial stakeholders in general due in part to the support for the status quo from written and oral comments received during the amendment scoping process. The plurality of comments (41%) supported the status quo on Issue 2: Commercial/Recreational Allocation (MAFMC et al 2020). Moreover, the majority of commercial crew surveyed in both the 2012 and 2018 Crew Surveys reported that the rules and regulations change so quickly that it can be hard to keep up. While these results are not necessarily representative of bluefish commercial crew in general, they do align with the overall sentiment supporting the status quo among those who provided comment during the scoping process.

Alternative 2a-2 would increase the recreational fishery allocation by 6 percentage points and reduce the commercial allocation by the same amount using 2014-2018 and 2009-2018 catch data. Results from the Commercial Crew Survey indicate that the majority of crew and hired captains believe the rules and regulations in their respective commercial fisheries are too restrictive. An increase in allocation to the recreational sector could allow for a liberalization of measures, potentially providing positive social impacts. Further reducing the commercial allocation could lead to negative impacts with respect to commercial fishers' attitudes towards management, as

well as detrimental impacts on the ability of some fishers to continue to participate in the fishery. According to the Social Performance Indicators [2], the five most highly engaged communities in the commercial bluefish fishery from 2009 to 2019 are: 1) Wanchese, NC; 2) Montauk, NY; 3) Narragansett/Point Judith, RI; 4) Hampton Bays/Shinnecock, NY; and 5) New Bedford, MA (Figure 1). For commercial bluefish stakeholders located in these ports, the reduction in allocation to the commercial fishery may have the most substantial negative social impacts.

Relative to the status quo alternative, alternative 2a-2 would have positive impacts for recreational user groups, and in particular for those groups in communities that are highly engaged in and reliant upon recreational fisheries. The top fifteen communities in recreational fishing engagement and reliance are displayed in Figure 2 and Figure 3. Please note that the recreational fishing engagement and reliance scores are not bluefish specific, the metrics were based off of fishing engagement and reliance for all recreational species. For a more thorough introduction of community fishing engagement and social vulnerability indicators please reference Appendix A.

These communities are likely to benefit from Alternative 2a-2, but some may see greater positive social impacts based on relative social vulnerabilities and reliance on the recreational industry. Communities in NC in particularly, such as Topsail Beach, Hatteras, and throughout the Outer Banks, have high reliance on recreational fisheries while at the same time moderate to high poverty, labor force vulnerability, and housing vulnerability. Increasing recreational allocations for bluefish could improve economic opportunities and result in positive social outcomes for these communities in particular.

Alternative 2a-3 proposes to set the recreational allocation at 87% and adjust the commercial allocation down to 13%, based on the 1999 to 2018 catch data. Under alternative 2a-4, the recreational allocation would be set to 86% and the commercial allocation would be 14%, based on multiple approaches including 1981-2018 catch data, 2014-2018 landings data, and 2009-2018 landings data. The commercial and recreational impacts described for alternative 2a-2 likely apply to a lesser degree to alternatives 2a-3 and 2a-4 considering that the shifts in allocation from the commercial to the recreational sector are smaller than what is proposed in alternative 2a-2.

Under alternative 2a-5, the recreational allocation would increase slightly from the status quo to 84% and the commercial allocation would correspondingly decrease slightly to 16%. These allocation determinations would be based on multiple approaches using the 1981-2018 and 1999-2018 landings data. Alternative 2a-5 is expected to have neutral to low positive social impacts on the recreational bluefish fishery relative to the status quo, whereas 2a-5 would likely produce neutral to low negative impacts on the commercial fishery as compared to the status quo. While the allocations would change, the increases and decreases for each user group are comparatively minimal to alternatives 2a-2, 2a-3, or 2a-4.

At the community level, impacts may be greatest for communities with or near recreational fishing sites, communities where for-hire businesses are based, and communities with tourism that is impacted by recreational fishing.

[2] https://apps-nefsc.fisheries.noaa.gov/socialsci/pm/index.php.

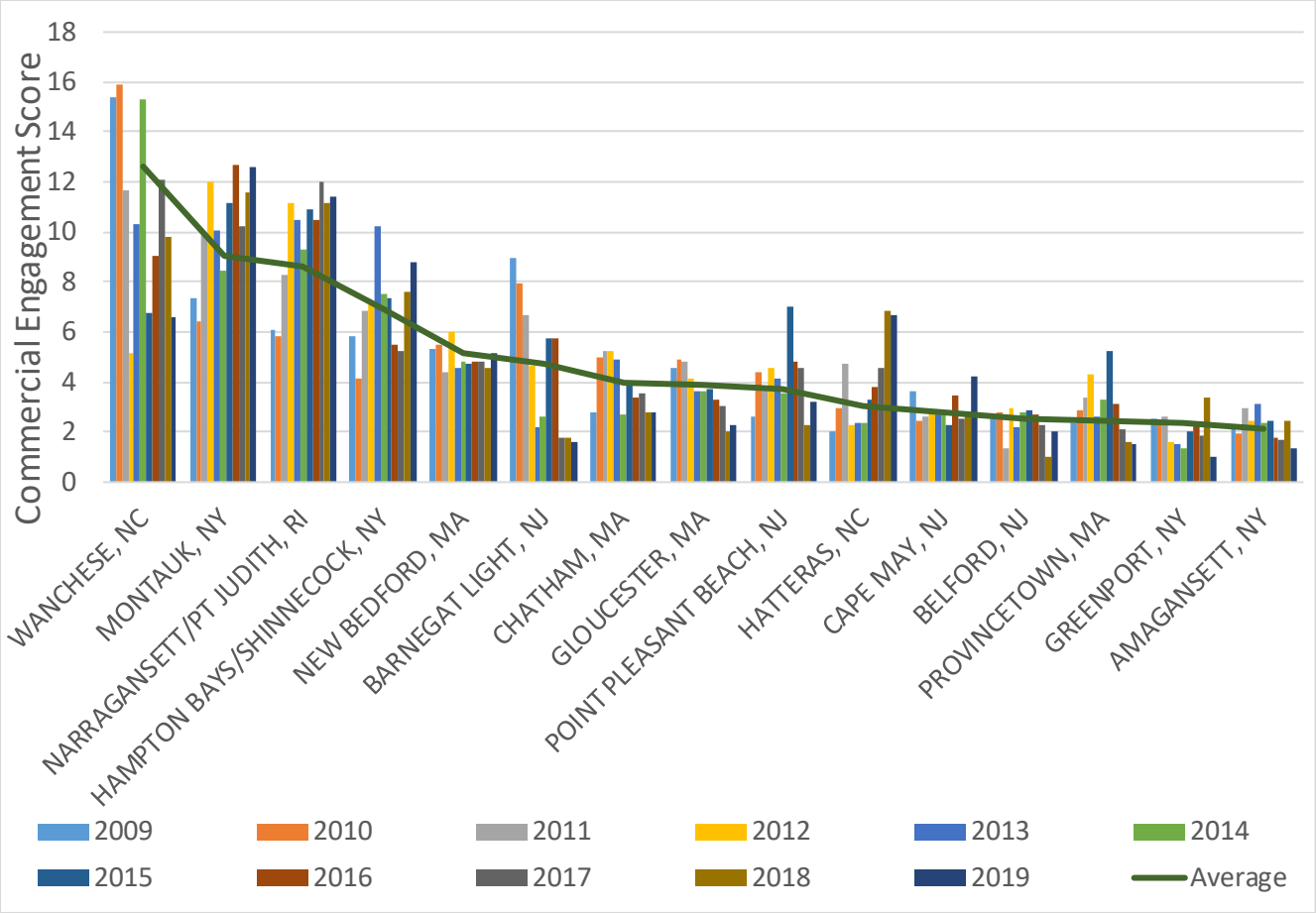


Figure 1: Commercial Bluefish Engagement Scores by Community: Top Fifteen Communities in Average Engagement from 2009-2019.

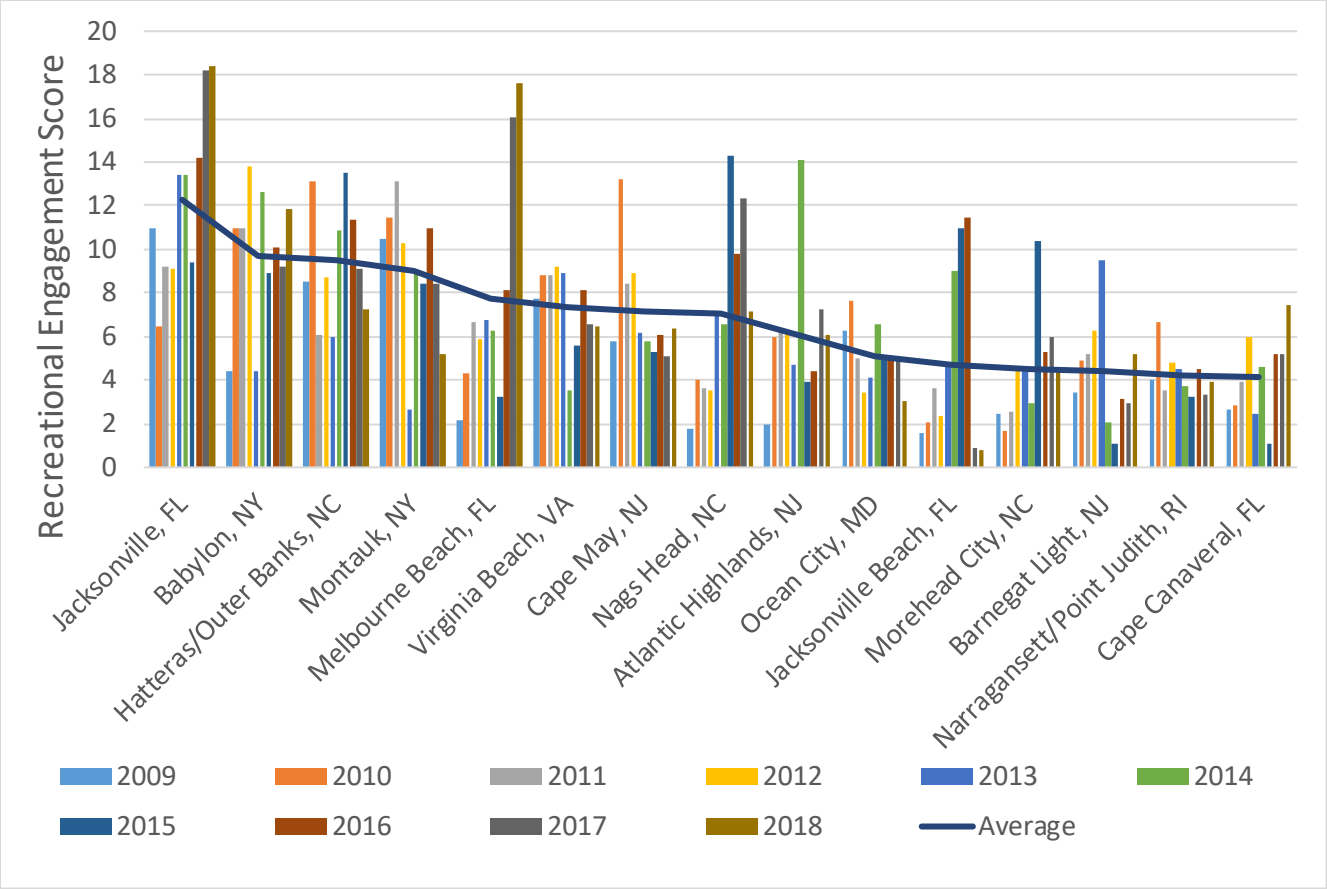


Figure 2: Recreational Fishing Engagement Scores by Community: Top Fifteen Communities in Average Engagement from 2009-2018.

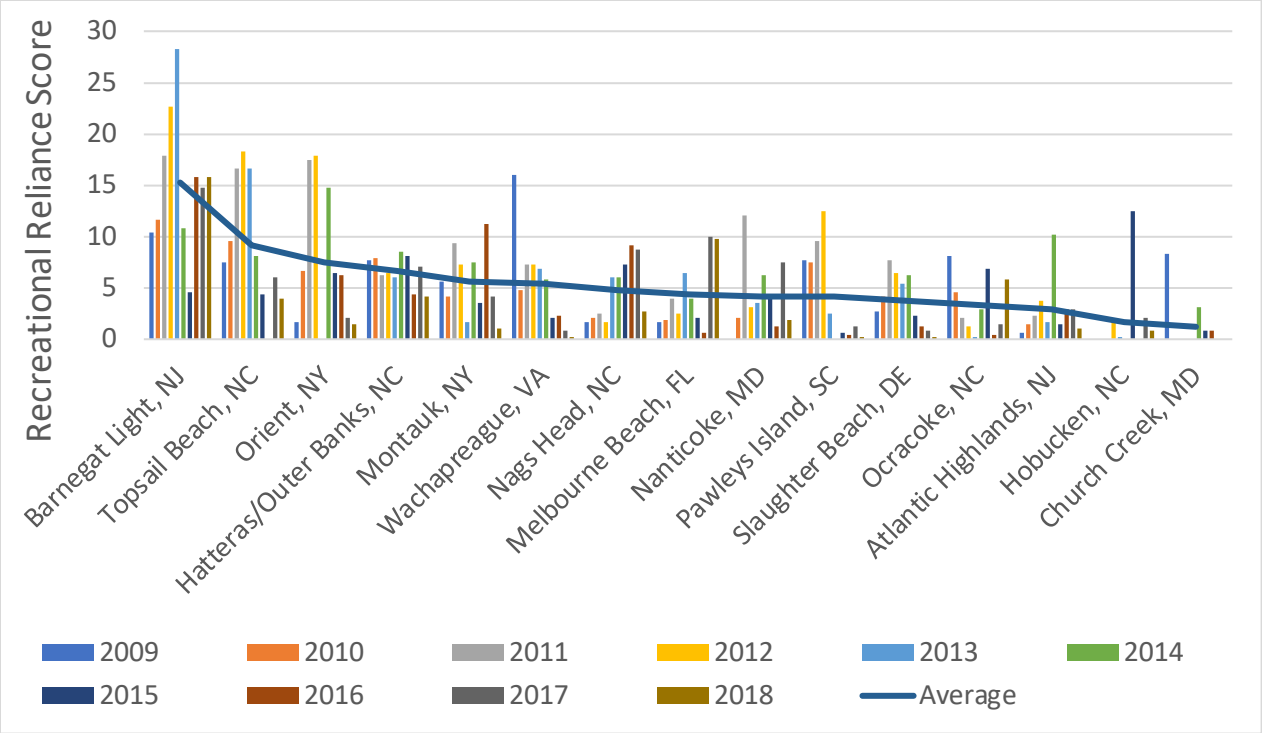


Figure 3: Recreational Fishing Reliance Scores by Community: Top Fifteen Communities in Average Reliance from 2009-2018.

Economic Impacts

Aside from the no action/status quo alternatives, all alternatives result in a reduced allocation to the commercial sector, which is expected to decrease commercial quotas compared to the current allocations. The commercial sector could experience a loss in revenue due to corresponding decreased quotas and a reduction in potential landings of bluefish. However, with the exception of 2020, the commercial sector has not fully utilized its post transfer quota in over a decade, so a decrease in allocation may not necessarily lead to a decrease in commercial landings or revenues in the long term. The economic analysis discussed below looks at historical landings to inform the potential future economic impacts of a reduction in the commercial allocation.

The economic impacts stemming from alterations in the commercial pre-transfer bluefish allocations were assessed using historical realized and predicted bluefish landings for the commercial sector. The time series used spans from 1999-2019[3] where realized landings are compared to pre-transfer quota across the various proposed sub-alternatives, allocating 17% (i.e., the status quo), 11%, 13%, 14%, or 16% of the ACL to the commercial sector (sub-components 2a-1 to 2a-5, respectively) (Figure 4). A key assumption of this analysis is that all the allocated quota is landed. When comparing the pre-transfer allocated quota to the total realized landings, there are 14 of 95 cases where the pre-transfer quotas exceed the realized landings quantities. Each allocation sub-alternative (2a-1 to 2a-5) contains at least one year in which the pre-transfer

[3] Regulations and catch limits for this fishery are not clearly defined until Amendment 1 (approved in 1999). The year of 2019 was the last full year of data on record when this economic assessment was drafted.

commercial allocation exceeds the realized annual commercial landings, suggesting that in these years, the pre-transfer allocation would not have been a limiting factor in landing bluefish. Ultimately, losses in landings resulting from smaller pre-transfer quota allocations relative to realized landings becomes relevant if transfers from the recreational sector to the commercial sector are discontinued.

Post transfer, projected quotas exceed the realized commercial landings for all alternatives each year except in for 2a-2 and 2a-3 in 2001, 2015 (2a-2 only) and 2016. However, if MRIP recalibration was factored into these years when transfers occurred, the commercial sector may not have actually received any transfers (or the transfers may have been much smaller). Ultimately, if sector transfers are to continue and are not substantially lower than previous years, changes in landings stemming from the pre-sector transfer quota allocations are expected to be minimal.

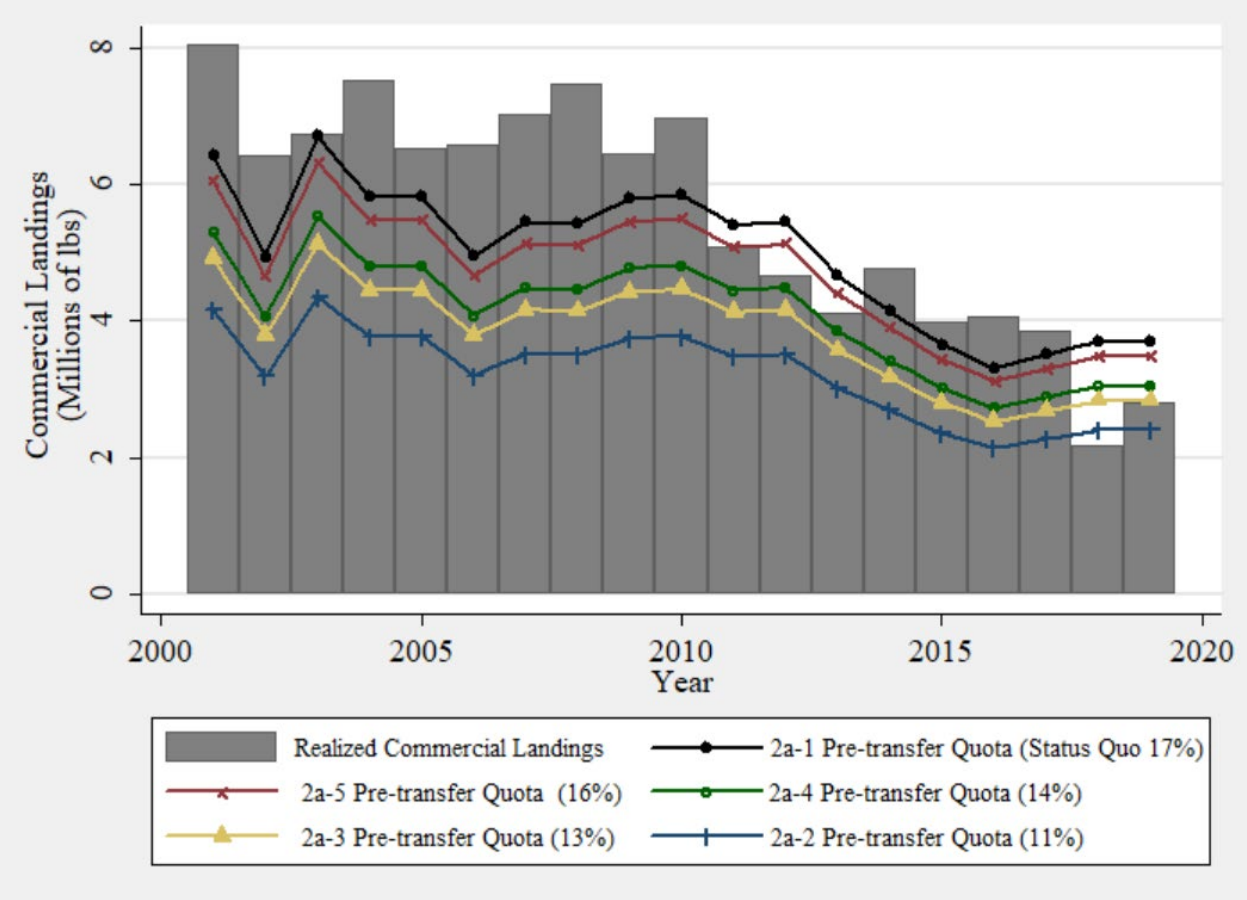


Figure 4: Realized commercial bluefish landings and proposed pre-transfer commercial landings (Millions of lbs.) by sub-allocation alternative and year (2001-2019).

For this analysis, commercial revenues are estimated for allocations under the status quo of pre-transfer quota (i.e.,17% of the ACL) and are compared to revenues estimated under the four additional proposed allocation sub-alternatives (2a-2 – 2a-5, 11%,13%,14%, and 16% of the ACL) to provide insight into how allocation changes could impact revenue. Revenues are estimated using the allocated pre-transfer quota percentage and all quota is assumed to be landed. The price model

described in Appendix B is used to generate average annual ex-vessel bluefish prices at the various landings levels. The pre-transfer landings are multiplied by the predicted price and presented in 2020 constant dollars as the estimated revenue. Average differences in revenues between the status quo (17% of the ACL) and the additional proposed allocation percentages are presented in Table 3. Over 1999-2019, annual revenues decrease by an average of $200K (6%), $590K (18%), $790K (29%) and $1.19M (35%) under the 16%, 14%, 13% and 11% commercial allocations relative to the 17% allocation, respectively. Average differences in annual revenues decrease in magnitude when averaged over the last 10 years and further decrease when compared to the 5-year average annual revenue differences driven by relatively lower historical ABC's from 2010-2019. This analysis is informative in the potential average reduction in revenue that may be experienced under each allocation alternative. However, it is important to remember that this analysis assumes that the entire commercial quota be landed, which may not always be the case, especially when considering that commercial quotas will increase substantially as the stock rebuilds back to the biomass target.

Table 3: Average differences in estimated commercial bluefish revenues by pre-transfer alternative relative to the pre-transfer quota status quo (2a-1 vs. 2a-2-5).

Time Series	Average Differences in Estimated Revenues (Millions of 2020 Constant Dollars)			
	11% Commercial Quota (2a-2) vs 17% Status Quo (2a-1)	13% Commercial Quota (2a-3) vs 17% Status Quo (2a-1)	14% Commercial Quota (2a-4) vs 17% Status Quo (2a-1)	16% Commercial Quota (2a-5) vs 17% Status Quo (2a-1)
Averaged over Entire Time Series (1999-2019)	-$1.19M	-$0.79M	-$0.59M	-$0.20M
Standard Deviation	*0.14*	*0.09*	*0.07*	*0.02*
Averaged over Past 10 Years (2010-2019)	-$1.09M	-$0.72M	-$0.54M	-$0.18M
Standard Deviation	*0.12*	*0.08*	*0.06*	*0.02*
Averaged over Past 5 Years (2015-2019)	-$0.98M	-$0.65M	-$0.49M	-$0.16M
Standard Deviation	*0.03*	*0.02*	*0.01*	*0.00*
Average Percent Decrease Relative to Annual Status Quo Revenues (1999-2019)	35%	24%	18%	6%

Note: This calculation does not consider transfers from the recreational sector and is based solely on the full utilization of the pre-transfer quota.

Impacts from a reduction in commercial quota will not be uniform across all states and commercial industry participants. Commercial fishermen from states that fully utilize quota are more likely to experience losses in revenue, restrictive trip limits, and seasonal closures to account for the reduced commercial quota. States that have historically underutilized their quota may still be impacted in the medium- to long-term; reduced access to quota may inhibit the ability for market expansion in the future. These states could also be impacted in the near-term depending on the magnitude of allocation reduction. If the commercial allocation is reduced substantially, quotas in some states may drop below what is currently being utilized. Again, the impacts across states are also dependent upon the state commercial allocation alternative selected in section 6.

Ultimately, alternatives 2a-2 through 2a-5 may limit the potential for market expansion and future increases in landings and ex-vessel revenue compared to the status quo alternative (2a-1).

Currently, accountability measures (AM) [4] are implemented when the fishery-level ACL is exceeded, and a transfer was deemed not the cause of the overage. When there has been a sector transfer to the commercial fishery that is larger than the overage, there will be no transfer allowed in the following fishing year unless the transfer amount is smaller than the overage. However, given the bluefish stock is currently overfished, a combination of management measures and a pound for pound payback may be implemented.

Under section 9, management uncertainty is discussed. If alternative 6b is selected, which creates sector-specific ACLs, AMs will be modified to ensure overages by one sector do not affect the other sector, unless a transfer has occurred and was the cause of an overage.

It is difficult to identify and quantify the economic impacts stemming from increases in recreational bluefish quota. Without a demand model, it is impossible to estimate the changes in angler effort and expenditures resulting from quota increases. Qualitatively, increases in recreational bluefish quota is expected to have neutral or slightly positive economic impacts which may result from increases in recreational sector quota. Increases in bag limits might increase angler satisfaction as well as recreational for-hire and independent angler trips which would result in increased expenditures and effort. However, the economic impacts resulting from increases in recreational quota could be neutral given the high catch and release nature of the sector—where the same number of trips may occur despite the changes in quota.

Biological Impacts

As described above, all but the no action/status quo alternatives would reduce the commercial allocations, which would in turn result in lower commercial quotas than the no action/status quo alternatives.

Depending on the scale of the change, a decrease in the commercial quota or additional restrictions on the recreational fishery could lead to altered fishing behavior and increased regulatory discards compared to recent levels. Actual changes will depend on many factors such as weather, availability of other target species, and market demand. Discards are also influenced by availability of bluefish, both overall abundance and by size class. For example, a new large year class can lead to high availability of fish smaller than some states' minimum size for a few years, which can lead to increased regulatory discards. Lower availability of legal-sized fish can lead to decreased

[4] Current accountability measures for bluefish can be found in Amendment 4: Bluefish Accountability Measures.

discards. For these reasons, it is challenging to predict future discards based on changes in allocations.

In all cases, total dead catch will continue to be constrained by the overall ABC, which is set based on the best scientific information available and is intended to prevent overfishing. In this way, none of the alternatives are expected to change patterns in landings, discards, or fishing effort in such a way that they negatively impact stock status.

In 2019, the operational stock assessment indicated that the bluefish stock was at 46% of the biomass target level. The stock will begin a rebuilding program in 2022 with the goal of reaching the biomass target within ten years or less.

5.2 Allocation Change Phase-In

5.2.1 Allocation Change Phase-In Alternatives

The alternatives listed in Table 4 consider if any changes to the allocation percentages considered through alternative sets 2a should occur in a single year (alternative 2b-1, no phase-in) or if the change should be spread out over 4, 5, or 7 years (alternatives 2b-2). The Council and Board agreed that if alternative 2b-2 is selected, the duration over which new allocations will be phased in will match the duration of the selected rebuilding plan (alternatives 4a-4d). The choice of whether to use a phase-in approach, and the phase-in approach duration, may depend on the magnitude of allocation change proposed. *A phase-in period may not be desired if the overall allocation change is relatively small.* However, larger allocation changes may be less disruptive to fishing communities if they are phased in over several years (Table 5).

Table 4: Bluefish commercial/recreational allocation change phase-in alternatives.

Phase-in Alternatives
2b-1: No phase-in
2b-2: Allocation change spread evenly over the same duration as the selected rebuilding plan

Table 5: Percent shift in bluefish commercial/recreational allocation per year for 4, 5, and 7-year phase-in options for all allocation change alternatives.

Bluefish Commercial/Recreational Allocation Change Phase-In			
Current allocation (2a-1): 83% recreational, 17% commercial			
Allocation Alternatives	**4-year phase-in**	**5-year phase-in**	**7-year phase-in**
2a-2: 89% Rec., **11%** Comm.	**1.5%** change per year	**1.2%** change per year	**0.86%** change per year
2a-3: 87% Rec., **13%** Comm.	**1%** change per year	**0.8%** change per year	**0.57%** change per year
2a-4: 86% Rec., **14%** Comm.	**0.75%** change per year	**0.6%** change per year	**0.43%** change per year
2a-5: 84% Rec., **16%** Comm.	**0.25%** change per year	**0.2%** change per year	**0.14%** change per year

5.2.2 Impacts of Allocation Change Phase-In Alternatives

The biological, social, and economic impacts of the phase-in alternatives under consideration in this amendment are dependent on two main factors: 1) the difference between the status quo allocation percentage and the allocation percentage selected, and 2) the duration of the phase-in

period, which will be the same duration as the preferred rebuilding plan. Based on the range of allocation percentages for bluefish (Section 5.2.1), the commercial and recreational sector allocations could shift by as much as 1.5% per year, or as little as 0.2% per year under the above phase-in timeframes of 4-7 years. Ideally, minimal transfers will occur while phasing-in allocations considering reallocation will reflect more up-to-date landings history.

Considering the small range that the phased-in allocations would change over 4-7 years, minimal impacts are expected for the recreational fishery, which already holds the larger share of the ACL. However, a 1.5% shift in allocation away from the commercial sector is a much larger annual impact to the commercial sector relative to its smaller initial allocation. As such, a phase-in approach may slightly reduce the economic burden on commercial stakeholders. A phase-in would most likely have short-term economic benefits in the form of increased landings and revenues over the non-phase in alternative if all else was held constant.

Under Alternative 2b-1, the preferred allocation selected from the 2a set of alternatives will occur in a single year upon implementation. This will likely have a range of social impacts depending upon the alternative selected from the 2a allocation set. Alternative 2b-1 will likely have neutral to low negative impacts on the commercial fishery if alternatives 2a-4 or 2a-5 are selected, but the negative impacts increase substantially if alternatives 2a-2 or 2a-3 are selected due to the abrupt and sizeable change in allocations to the commercial fishery. However, this remains contingent on the continuation of sector transfers and if the transfers decrease in relation to historical transfers given the MRIP update.

By contrast, an abrupt shift from alternative 2b-1 in concert with 2a-2 or 2a-3 could have substantial short-term positive social impacts on the recreational fishery user group. A single year increase of 4-6% in the recreational allocation could provide additional employment and income opportunities, especially in communities most highly engaged in and/or reliant upon recreational fisheries in general (Figure 2 and Figure 3).

Under alternative 2b-2, the new allocation selected from the 2a set of alternatives will be phased in over the period of time that matches the selected rebuilding plan. The phase-in approach of alternative 2b-2 will likely have the most substantial social impacts if alternative 2a-2 is selected, with diminishing impacts across the other alternatives with smaller percent changes in allocations. The 7-year phase-in approach may reduce the negative impacts to the commercial industry the most, with less than a one percent reduction in the commercial allocation per year. For communities that are the most highly engaged in commercial bluefish (Figure 1) a prolonged phase-in approach may buffer against negative social impacts that accompany abrupt employment and income losses that result from the allocation reductions associated with alternatives 2a-2 through 2a-5.

6.0 COMMERCIAL ALLOCATIONS TO THE STATES ALTERNATIVES AND IMPACTS

The sections below describe alternatives for commercial allocations of bluefish to the states, along with their expected impacts. The range of allocation alternatives includes options that would maintain the current allocations as well as options to revise them based on updated data using modified base years. Only landings data were used to develop allocation alternatives since commercial discards are considered negligible. Section 6.2 describes options to phase in any

allocation changes over multiple years, and the expected impacts of these phase-in provisions. Section 6.3 describes options to implement quota-based triggers that would reallocate any commercial quota that exceeds a specified threshold, and the expected impacts of those trigger provisions. Section 6.4 describes options to implement minimum default allocations, and the expected impacts of these provisions.

The alternatives in section 6 are mutually exclusive, meaning the Council and Board can only choose one of the alternatives from set 3a, 3b, 3c, and 3d. Considering section 6 contains multiple moving parts, the Fishery Management Action Team (FMAT) recommends that the Council and Board select either a trigger approach or minimum default allocation, but not both. Using too many management tools at once can overcomplicate the process and reduce the benefits associated with just using one approach.

6.1 Commercial Allocations to the States

6.1.1 Commercial Allocations to the States Alternatives

Table 6 lists the alternatives under consideration for the bluefish commercial allocations to the states using only landings data since commercial discards are considered negligible. The percent allocations represent the share of coastwide quota that is annually allocated to each state. The current allocations are represented by the no action/status quo alternative (alternative 3a-1, highlighted in green in Table 6), which was set through Amendment 1 using General Canvass Data.

Table 6: State-by-state commercial bluefish allocations along the U.S. Atlantic coast using different proposed time series. Percentages sum to > 100% due to rounding; actual allocations will not exceed 100% of quota.

Landings-Based Allocation Alternatives				
State	3a-1	3a-2	3a-3	3a-4
	No action/ Status quo (1981-1989)	5 year (2014-2018)	10 year (2009-2018)	1/2 '81-'89 1/2 '09-'18
ME	0.67%	0.00%	0.01%	0.49%
NH	0.41%	0.03%	0.12%	0.33%
MA	6.72%	10.64%	10.16%	7.66%
RI	6.81%	11.81%	9.64%	7.59%
CT	1.27%	1.18%	1.00%	1.19%
NY	10.39%	20.31%	19.94%	13.01%
NJ	14.82%	11.23%	13.94%	14.57%
DE	1.88%	0.58%	0.40%	1.47%
MD	3.00%	1.50%	1.84%	2.68%
VA	11.88%	4.62%	5.85%	10.26%
NC	32.06%	32.06%	32.38%	32.13%
SC	0.04%	0.00%	0.00%	0.03%
GA	0.01%	0.00%	0.00%	0.01%
FL	10.06%	6.07%	4.75%	8.59%
Total	**100.02%**	**100.01%**	**100.03%**	**100.00%**

6.1.2 Impacts of Commercial Allocations to the States Alternatives

Under alternative 3a-1, no changes to the commercial allocations would be made, meaning this alternative would result in impacts to the bluefish stock, non-target species, habitat, protected resources, and human communities that are generally similar to conditions in recent years. Bluefish landings and effort would continue to be constrained by the annual quotas and associated management measures. States would continue to be constrained to their existing state allocation, and the distribution of landings by state would remain similar to the generally stable levels observed since allocations were implemented in 2000 (Figure 5). Typically, landings by state as a percentage of coastwide landings do not fluctuate much from year to year since allocations are constant and most states land or come close to landing their quota. Exceptions do occur, as bluefish often display an idiosyncratic nature in movements into deeper waters offshore and up the coast, and states often receive transfers of quota from other states. Commercial landings from ME, NH, SC, and GA are minimal if they occur at all, since directed fisheries for bluefish do not exist in these states. The majority of landings in these states are incidental.

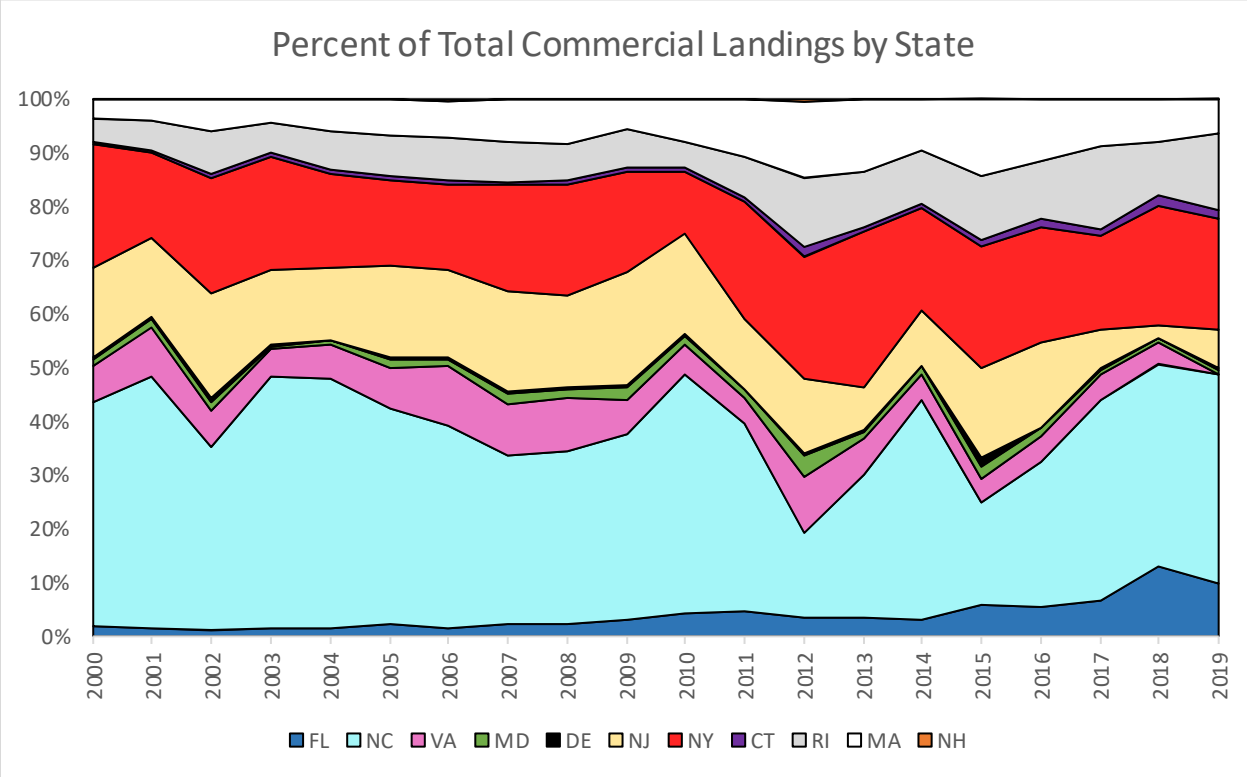


Figure 5: Percentage of coastwide landings by state from 2000-2019 (Atlantic coast excluding ME, SC and GA). ME, SC, and GA each account for less than 0.1% of landings each year.

Alternatives 3a-2 and 3a-3 are both based on recent time series (most recent 5 and 10-year time series, respectively) Therefore, the allocations are relatively similar given both time series reflect more recent landings. In contrast, alternative 3a-4 is based on the average of one recent time series (2009-2018) and one historic time series (1981-1989) to encompass the recent state of the commercial fishery as well as historical fishery performance. In capturing recent and historical fishery performance, the allocations associated with alternative 3a-4 equally weigh both time series

resulting in allocations that are closer to the status quo (3a-1) alternative than alternatives 3a-2 and 3a-3. Table 7 displays the four alternatives and the resulting percentage increase (blue) or decrease (red) relative to the current allocations (3a-1) for each state.

Table 7: State-by-state commercial bluefish allocations along the U.S. Atlantic coast including the percent change (negative in red; positive in blue) from status quo for each alternative.

Allocation Alternatives Based on Landings Data							
	3a-1	3a-2		3a-3		3a-4	
State	Status quo (1981-1989)	5 year (2014-2018)		10 year (2009-2018)		1/2 '81-'89 1/2 '09-'18	
ME	0.67%	0.00%	-100%	0.01%	-99%	0.49%	-27%
NH	0.41%	0.03%	-93%	0.12%	-71%	0.33%	-20%
MA	6.72%	10.64%	58%	10.16%	51%	7.66%	14%
RI	6.81%	11.81%	73%	9.64%	42%	7.59%	11%
CT	1.27%	1.18%	-7%	1.00%	-21%	1.19%	-6%
NY	10.39%	20.31%	95%	19.94%	92%	13.01%	25%
NJ	14.82%	11.23%	-24%	13.94%	-6%	14.57%	-2%
DE	1.88%	0.58%	-69%	0.40%	-79%	1.47%	-22%
MD	3.00%	1.50%	-50%	1.84%	-39%	2.68%	-11%
VA	11.88%	4.62%	-61%	5.85%	-51%	10.26%	-14%
NC	32.06%	32.06%	0%	32.38%	1%	32.13%	0%
SC	0.04%	0.00%	-100%	0.00%	-100%	0.03%	-25%
GA	0.01%	0.00%	-100%	0.00%	-100%	0.01%	0%
FL	10.06%	6.07%	-40%	4.75%	-53%	8.59%	-15%
Total	100.02%	100.01%[5]		100.03%		100.00%	

Social Impacts

The socioeconomic impacts of the existing allocations vary from state to state. Some states report negative economic impacts associated with current allocations due to a mismatch between their current allocation and their fishery capacity and/or bluefish availability in their waters. Commercial fishermen that land bluefish within a state that consistently harvests less than its quota have the benefit of operating within an unconstrained fishery. Future fluctuations in stock size are less likely to restrict fishing effort and mitigate revenue losses within that state. Each state manages their fishery differently in terms of total number of participants, trip limits, seasons, and other measures. A restriction in one or more of these measures is the driver of the social and economic impacts to industry participants. For example, a restriction in the daily trip limit will likely have an outsized impact on larger vessels compared to smaller vessels which may already harvest bluefish under the newly imposed daily trip limit.

The proposed allocation alternatives incorporate more recent data that are reflective of current state-specific performance and have the potential to increase economic efficiency. Nonetheless, any reduction in allocation may limit a state's potential for market expansion and future increases

[5] Some percentages exceed 100% due to rounding but will be adjusted by the regional office upon implementation.

in landings and ex-vessel revenue compared to the no action alternative. Revenue is also variable in nature and is influenced by fluctuations in costs and prices.

Under alternative 3a-1, impacts are likely negative for commercial fishery stakeholders located in states with smaller proportions of allocations relative to what commercial stakeholders believe should be their states' allocations. The submitted scoping comments were divided roughly in half, with 52% of commenters supporting status quo and 48% in favor of altering the commercial allocations to the states. Among the commercial stakeholders who submitted comments opposed to altering the state allocations were those from NJ (and other states where reductions would take place) who were opposed to reductions in the NJ allocation. Others supported the status quo so long as flexibility remained to transfer quotas between states when necessary. On the other hand, roughly half of the submitted comments were in favor of revisiting state commercial allocations.

Alternative 3a-2 would set allocations using a five-year time series of landings data (2014-2018). MA, RI, and NY would see the most substantial increases in allocations using this approach, whereas NJ, VA, and FL would see the largest reductions in commercial allocations under this approach. NY has two of the top five (Montauk and Hampton Bays/Shinnecock) and four of the fifteen most highly engaged communities in the commercial bluefish fishery (Figure 3). Relative to status quo, alternative 3a-2 would likely result in positive social impacts for these NY communities given the substantial increase in allocations to the state. While FL and VA do not have any communities among the top fifteen in commercial bluefish engagement, four of the fifteen highest in engagement are located in NJ. Therefore, while FL and VA may not experience substantial negative impacts from the reductions in commercial allocations, NJ communities and user groups will likely experience negative social impacts from alternative 3a-2.

Under alternative 3a-3, a 10-year time series of landings data would inform the distribution of state allocations of commercial bluefish. This scenario would increase the allocations for RI (~3%), MA (~3%), and NY (~9%) considerably, but reduce allocations for VA and FL by a similarly substantial amount (~6%). Unlike alternative 3a-2, however, this alternative would only reduce the NJ allocation by less than one percent. Relative to the status quo, alternative 3a-3 would likely result in positive social impacts for commercial stakeholders in MA, RI, and NY, while at the same time limiting the negative impacts of reducing the allocation to NJ. As discussed under alternative 3a-2, communities in FL and VA do not feature among the most highly engaged in commercial bluefish activity (Figure 3), whereas MA, RI, NY, and NJ all have several communities with relatively high engagement in commercial bluefish fishery activities. Alternative 3a-3 provides relative benefits to most of the north Mid-Atlantic and New England user groups without affecting stakeholders in NJ as dramatically as alternative 3a-2.

Under alternative 3a-4, state allocations would be redistributed based partially on landings data from the 1981-1989 time series and partially on the 2009-2018 time series. This approach provides the most limited change in state allocations among other alternatives to the status quo. Northern states such as MA, RI, and NY would see modest increases in allocations (under 3%), while southern states such as NJ, VA, and FL would only see minor decreases in allocations (~2% or less). Alternative 3a-4 would likely result in neutral to low positive social impacts for the northern states and neutral to low negative impacts for the southern states relative to the status quo alternative. Among all state allocation alternatives, alternative 3a-4 would likely produce the least impactful changes to the social factors among commercial bluefish fishery stakeholders and communities.

Economic Impacts

The current state-level commercial allocations consider landings data from 1981-1989. Through transfers, states which predict to land bluefish quantities above their allocated quota can request additional quota from states which are not expected to land their allocation. This transfer increases the requesting state's landings and revenues, overall. In addition, no incentives are given to the state transferring out quota. In theory, this transaction could be classified as a Pareto improvement, where the transfer of quota does not negatively impact either participating party. Given that these state-to-state transfer channels exist, the economic impacts of the proposed reallocations at the state-level are expected to be marginal during years of higher bluefish population levels given that 1) allocations are based on realized landings/catch data and 2) states can transfer quota depending on their predicted performance in any given year. However, in years when the coastwide commercial quota is low resulting from an overfished stock, there may not be a sufficient number of states with additional quota available to cover other states' needs. During these years, states with a small allocation relative to their share of recent coastwide landings are likely to be negatively impacted the most. In addition, there is opportunity cost in the form of time and effort associated with transfers. There is a decrease in economic efficiency linked with the processing and approving of transfer requests. If transfers continue, the maximum economic benefits are associated with the reallocation plan which accurately captures each states' quota needs and minimizes the need for quota transfers.

To highlight how each allocation alternative relates to decreases in state quota transfers, both realized landings and average reallocation quantities by sub-alternative are depicted in Figure 6. Here, the distribution of each state's annual bluefish landings are summarized by box and whisker plots. The interquartile range of state-level bluefish landings are portrayed by the gray boxes and the whiskers, which indicate the maximum and minimum annual bluefish landing quantity for each state from 1999-2019. [6] Average annual allocations are calculated using the percentages presented in 3a-1 to 3a-4 which include the status quo of allocations determined using the 1981-1989 time series of landings data, allocations based on the previous five years of state landings, allocations based on landings from the previous 10 years, and allocations based on landings from 1981-89 and 2009-18. State allocations by sub-alternative are calculated using the historical commercial sector quota and each allocation plan's corresponding quota percentage from 1999-2019. The average allocations by state and plan are plotted against realized bluefish landings for comparison.

There is no consistent trend in impacts stemming from each reallocation sub-alternative when compared across states. For example, under status-quo, quota allocations for FL would be much greater than the state's median landings value (above the state's maximum annual landings value); however, for NY, quota allocated under the status quo alternative would be much less than the state's median realized landings. When comparing which sub-alternative is closest in value to the median realized landings of each state, plan 3a-3 (ten-year) performs the best, with landings predictions closest to 38% of state median landings values and furthest from only 8% of state median landings. [7] The 3a-2 plan (five-year) is second in performance based on this metric, which is closest to the median landings for 31% of states but furthest from the median value for 25% of states. The status quo (3a-1) plan had average allocations most similar to the median landings

[6] The 1999-2019 time series is used to show how the proposed allocations align with realized landings over the past two decades.

[7] This analysis excludes Georgia and South Carolina because each plan had an equal average allocation estimate.

values for 23% of states but is furthest from the median landings value for 67% of states. Lastly, 3a-4 (1989-91 & 2009-18 based allocations) is nearest to 8% of state median landings values but furthest from the median value of 0% of the states. It should be reiterated that landings and revenues may not be impacted by the state-level reallocations if transfer requests continue to be issued and approved. However, by determining the plan which best predicts state landings, the need for transfers will decrease—increasing efficiency within the commercial sector. A slight economic advantage is expected for states which are allocated quota above their historic median landings value, as these states will have the ability to land above their expected median landings without requesting additional quota from another state, while states which are allocated a quota slightly below their annual median may need to request quota on an annual basis.

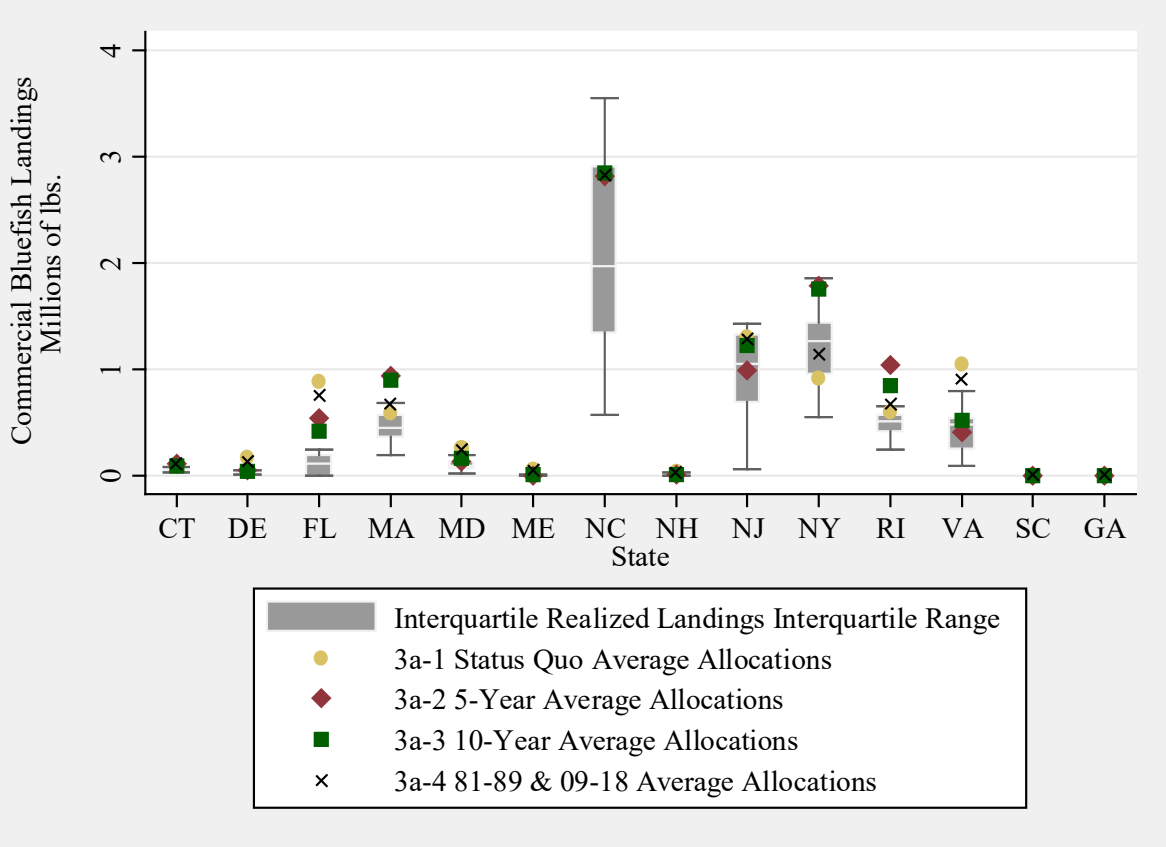


Figure 6: Realized annual commercial bluefish landings box and whisker plots (1999-2019) and average annual allocations (1999-2019) by proposed state-level allocation sub-alternative by state. Median landings represented by white horizontal line within box and whisker.

Biological Impacts

Currently, bluefish discards in the commercial fishery are considered negligible. Depending on the scale of the allocation change, a decrease in the commercial quota or additional restrictions on the commercial fishery could lead to increased regulatory discards compared to recent levels. Actual changes in discards will depend on many factors such as fishing behavior, weather, availability of other target species, and market demand. Discards are also influenced by availability of bluefish,

both overall abundance and by size class. Therefore, it is challenging to predict future discards based on changes in allocations.

6.2 Commercial Allocation Change Phase-In

6.2.1 Commercial Allocation Change Phase-In Alternatives

The alternatives listed in Table 8 consider if any changes to the allocation percentages considered through alternative set 3a should occur in a single year (alternative 3b-1, no phase-in) or if the change should be spread out over 4, 5, or 7 years (alternative 3b-2). The Council and Board agreed that if alternative 3b-2 is selected, the duration over which new allocations will be phased in will match the duration of the selected rebuilding plan (section 7). The choice of whether to use a phase-in approach may depend on the magnitude of allocation change proposed. Larger allocation changes may be less disruptive to fishing communities if they are phased in over several years as identified by the percent point change (Table 9).

Table 8: Bluefish state commercial allocation change phase-in alternatives

Phase-in Alternatives
3b-1: No phase-in
3b-2: Allocation change spread evenly over the same duration as the selected rebuilding plan

Table 9: Percentage point shifts in bluefish state commercial allocation per year for 4, 5, and 7-year phase-in options for all allocation change alternatives

		5 year (2014-2018) See 3a-2			10 year (2009-2018) See 3a-3			1/2 '81-'89 1/2 '09-'18 See 3a-4		
State	**Current Allocations**	**4-year**	**5-year**	**7-year**	**4-year**	**5-year**	**7-year**	**4-year**	**5-year**	**7-year**
ME	0.67%	-0.17%	-0.13%	-0.10%	-0.17%	-0.13%	-0.09%	-0.05%	-0.04%	-0.03%
NH	0.41%	-0.10%	-0.08%	-0.05%	-0.07%	-0.06%	-0.04%	-0.02%	-0.02%	-0.01%
MA	6.72%	0.98%	0.78%	0.56%	0.86%	0.69%	0.49%	0.23%	0.19%	0.13%
RI	6.81%	1.25%	1.00%	0.71%	0.71%	0.57%	0.40%	0.19%	0.16%	0.11%
CT	1.27%	-0.02%	-0.02%	-0.01%	-0.07%	-0.05%	-0.04%	-0.02%	-0.02%	-0.01%
NY	10.39%	2.48%	1.98%	1.42%	2.39%	1.91%	1.36%	0.65%	0.52%	0.37%
NJ	14.82%	-0.90%	-0.72%	-0.51%	-0.22%	-0.18%	-0.13%	-0.06%	-0.05%	-0.04%
DE	1.88%	-0.33%	-0.26%	-0.19%	-0.37%	-0.30%	-0.21%	-0.10%	-0.08%	-0.06%
MD	3.00%	-0.38%	-0.30%	-0.21%	-0.29%	-0.23%	-0.17%	-0.08%	-0.06%	-0.05%
VA	11.88%	-1.82%	-1.45%	-1.04%	-1.51%	-1.21%	-0.86%	-0.41%	-0.32%	-0.23%
NC	32.06%	0.00%	0.00%	0.00%	0.08%	0.06%	0.05%	0.02%	0.01%	0.01%
SC	0.04%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	<0.01%	<0.01%	<0.01%
GA	0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	0.00%	0.00%	0.00%
FL	10.06%	-1.00%	-0.80%	-0.57%	-1.33%	-1.06%	-0.76%	-0.37%	-0.29%	-0.21%

Section 6.3 discusses alternatives related to the trigger approach. The trigger approach requires baseline quotas to determine the allocation of the quota greater than the trigger threshold. By

design, the phase-in approach alters each state's baseline quota on a yearly basis, which greatly complicates the calculation of each state's additional quota. The various combinations of phase-in and trigger alternatives would require numerous tables to display each state's allocation for each year during the phase-in period. *As such, examples are not included in this document and the combination of these approaches is not recommended.*

Section 6.4 discusses alternatives related to minimum default allocations. If the Council and Board decide to select both phase-in and a minimum default allocation, the percentage point shifts in Table 9 will be slightly smaller (see Appendix C).

6.2.2 Impacts of Commercial Allocation Change Phase-In Alternatives

The impacts described in section 5.2.2 largely apply here to the commercial allocations to the states. The biological, social, and economic impacts of the phase-in alternatives for the commercial allocations to the states under consideration in this amendment are dependent on three main factors: 1) the difference between the status quo allocation percentage and the allocation percentage selected, 2) the duration of the phase-in period, which will be the same duration as the preferred rebuilding plan (section 7), and 3) the continuation of state-to-state transfers (section 8). Based on the range of allocation percentages in Section 5.1.1, the commercial allocations to the states could shift by as much as 2.48 percentage points per year (NY), or as little as 0.01 percentage points (NH, SC, GA) per year under the above phase-in timeframes of 4-7 years. Table 7 (red/blue showing change in section 6.1.2) presents the percent change that would be associated with each alternative.

In summary, under alternative 3b-1, the state allocations selected from among the 3a set of alternatives would occur in a single year upon implementation. The social impacts of alternative 3b-1 will align with whichever 3a alternative is selected for determining the future of state allocations of commercial bluefish.

Under alternative 3b-2, both the positive and negative social impacts discussed in section 6.1.2 would still apply, but they would be phased in over time. This could mitigate to an extent the negative social impacts by providing a buffer through smaller percentage changes over time, but also slow the realization of some states' increases in quota and their associated positive social impacts.

6.3 Commercial Quota Triggers

6.3.1 Commercial Quota Trigger Alternatives

This alternative set would create state allocations that vary with overall stock abundance and resulting coastwide commercial quotas (Table 10). Options are provided to implement quota-based triggers that would reallocate any commercial quota that exceeds a specified threshold. The selection of alternative 3c-1 would implement no trigger, which is consistent with the current FMP. Alternative 3c-2 would implement a trigger level equal to the average of the initial commercial quota for each time series associated with alternative set 3a that do not include transfers from the recreational to commercial fishery. Alternative 3c-3 would implement a trigger level equal to the average of the final commercial quota that includes transfers from the recreational to the commercial fishery. Ultimately, the commercial quota time series selected will correspond with the time series associated with the alternative selected in section 6.1.1.

Please note, no trigger threshold was developed under the status quo state commercial allocations because no formal commercial quotas existed prior to the implementation of Amendment 1 in 2000. As such, the trigger approach is not able to be implemented under status quo commercial allocations to the states (alternative 3a-1).

Table 10: Trigger threshold levels for additional quota allocations.

Commercial Quota Time Series	**No Trigger** Alternative: **3c-1**	**Pre-Transfer** Alternative: **3c-2**	**Post-Transfer** Alternative: **3c-3**
No Action/Status quo [3a-1]	No trigger approach implemented	N/A	N/A
5-year (2014-2018) [3a-2]		3.67 M lbs	6.67 M lbs
10-year (2009-2018) [3a-3]		4.31 M lbs	8.21 M lbs
½ 1981-1989 and ½ 2009-2018 [3a-4]		4.31 M lbs*	8.21 M lbs*

*No formal commercial quota existed before the implementation of Amendment 1 in 2000; the average represents the quota for available years only.

For all years when the annual commercial quota is at or below a specified annual commercial quota trigger level, the state allocations would be specified by the selected option from alternative set 3a. In years when the annual coastwide quota exceeds the specified trigger level, quota up to the trigger amount would be distributed according to the chosen allocation alternative from alternative set 3a, and the distribution of quota over the trigger would be set according to the allocations listed in Table 11.

Table 11: Bluefish commercial state allocations applying a trigger threshold for all commercial allocation time series.

Allocation of additional quota greater than the trigger threshold.				
State	**Status quo (1981-1989)**	**5 year (2014-2018)**	**10 year (2009-2018)**	**1/2 '81-'89 1/2 '09-'18**
ME	0.10%	0.10%	0.10%	0.10%
NH	0.10%	0.10%	0.10%	0.10%
MA	7.50%	16.60%	19.60%	7.50%
RI	7.50%	16.60%	7.50%	7.50%
CT	3.00%	3.00%	0.10%	3.00%
NY	15.12%	16.60%	19.60%	17.03%
NJ	15.12%	16.60%	19.60%	17.03%
DE	3.00%	0.10%	0.10%	3.00%
MD	3.00%	3.00%	3.00%	3.00%
VA	15.12%	3.00%	7.50%	17.03%
NC	15.12%	16.60%	19.60%	17.03%
SC	0.10%	0.10%	0.10%	0.10%
GA	0.10%	0.10%	0.10%	0.10%
FL	15.12%	7.50%	3.00%	7.50%
Total	100%	100%	100%	100%

The allocations in Table 11 were developed by using the tiered approach displayed in Table 12 where the baseline quota allocations selected from alternative set 3a determine how the quota greater than the trigger will be allocated to each state. In summary, the trigger threshold level and the associated additional quota allocation are all informed by the time series selected in alternative set 3a.

Table 12: Range of baseline quotas and the associated additional quota allocation once a trigger threshold is surpassed.

Range of Baseline Quota Tiers	Associated Additional Quota Allocations
<=1%	0.10%
>1-5%	3.00%
>5-10%	7.50%
>10%	Remainder

Section 6.4 discusses alternatives related to minimum default allocations. If the Council and Board decide to select both a trigger approach and minimum default allocations, the percentages in Table 11 will shift slightly. On occasion, specific state allocations in the proposed time series will cross a threshold into a different percentage of associated additional quota (see Appendix C).

6.3.2 Impacts of Commercial Quota Trigger Alternatives

Between alternatives 3c-2 and 3c-3, the trigger thresholds associated with 3c-2 are more likely to be exceeded given the thresholds are much lower. These thresholds are approximately half those associated with alternative 3c-3 because they account for the commercial quotas prior to incorporating historical transfers from the recreational to commercial fishery. Figure 7 displays the four potential trigger thresholds and the post-transfer commercial quotas as well as total coastwide commercial landings for the years 2000-2018. Both of the potential pre-transfer trigger thresholds associated with alternative 3c-2 would have been exceeded by the commercial quota every year going back to 2000. By comparison, both of the potential post-transfer trigger thresholds associated with alternative 3c-3 would have been exceeded by the commercial quota for every year except 2015 and 2016 when the commercial quota was much lower. The trigger approach only impacts states directly in years when the trigger threshold level is exceeded. Following this logic, the impacts discussed in the economic impacts section are experienced to a greater degree under the lower pre-transfer trigger (3c-2) compared to the higher post-transfer trigger (3c-3).

The trigger approach could also provide additional beneficial social impacts or buffers against negative impacts, for states that are either receiving increased allocations or having allocations reduced. Therefore, alternatives 3c-2 and 3c-3 are likely to have a range of social impacts from neutral to low positive varying state-to-state, depending upon the alternative selected from the 3a set. Ultimately, the impacts are difficult to ascertain because of the number of combinations that can arise under the trigger option. Some states will experience neutral to positive impacts, others neutral to negative, and those impacts might change when quotas are below the trigger vs above the trigger. In summary, it is difficult to know what the impacts are, and the impacts will depend on other decisions made in this document.

Considering the bluefish FMP will be going through rebuilding starting at the end of this year, the FMAT concluded that it is unlikely the initial ABCs will be large enough to exceed the trigger threshold.

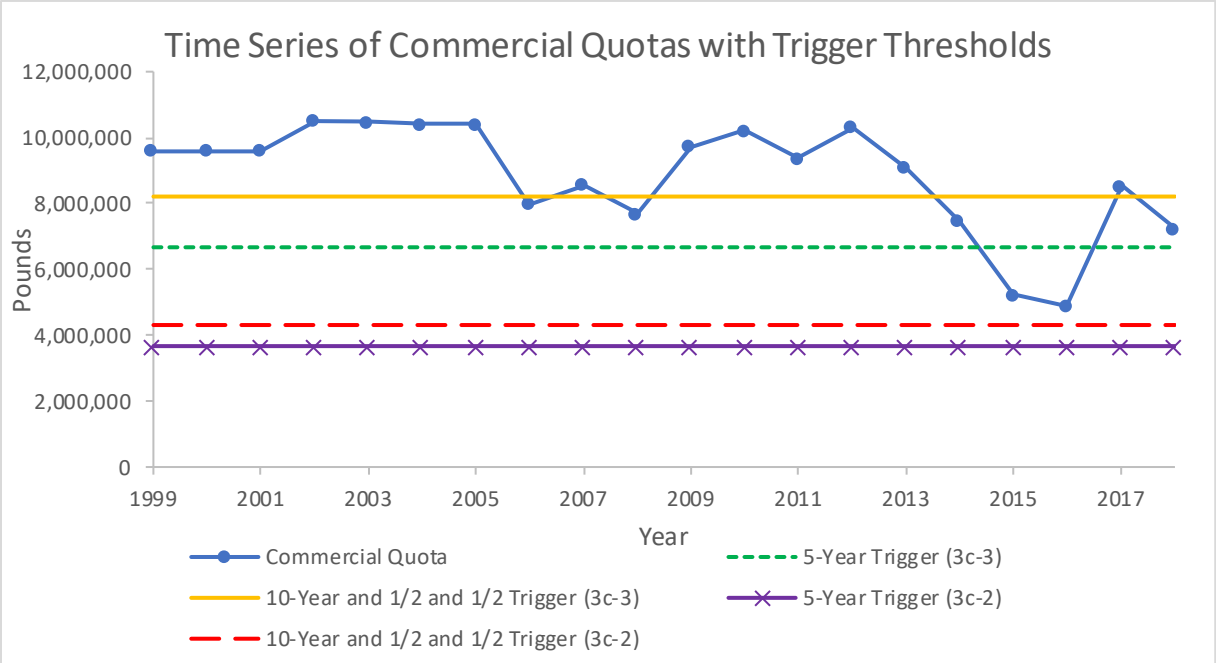


Figure 7: Trigger thresholds for additional quota compared to commercial quotas.

Economic Impacts

Section 6.3 would allocate quota differently above a specified pre- or post-transfer threshold (i.e., the trigger) than the allocation method described in section 6.1.1. To analyze the economic impacts of this difference in allocation, a commercial quota 100,000 lbs. above both the pre- and post-transfer threshold levels is used. [8] Revenues are calculated at the state-level using allocations under the trigger scheme. The revenues generated from the trigger-allocated quota are compared to revenues generated under a no-trigger allocation scenario across the various commercial sector allocations proposed in section 6.3 (i.e., 3a-1 through 3a-4). Since ex-vessel bluefish prices are needed at the state-level and a state-level price model has yet to be developed, annual state ex-vessel bluefish prices, averaged over 1996-2019, are used for the calculation of revenues and reported in 2020 constant dollars. One limitation of this analysis is that average state prices omit the inverse relationship between ex-vessel prices and estimated landing quantities. Average state prices reflect landing quantities closer to that of the pre-transfer trigger threshold amounts, as bluefish landings have never reached the proposed post-transfer trigger threshold levels.

[8] Average total realized bluefish landings from 1999-2019 equal 5.68 M lbs. which also informs the average price data used calculate revenues. Given that the post-transfer trigger quantities exceed the average realized landings, a minimum overage quantity of 100,000 lbs. was chosen to highlight the possible economic impacts of the trigger-induced allocation process of additional quota.

Conceptually, when the trigger is activated, states will receive greater quantities of quota if they are grouped into an allocation category which results in higher allocations than the non-trigger alternative allocation method. The opposite is true for a state that is allocated a higher percentage of quota under the non-trigger allocation but is grouped in an allocation bracket lower than its original allocation. For example, ME is allocated 0.67% under the status quo (i.e., 17% of the ABC for commercial sector pre-transfer allocations) with no trigger. With a trigger, the allocation of additional quota to ME would be set at 0.1% given that it falls in the ≤1% allocation range, resulting in less allocated quota than would be received under the state's baseline allocation percentage. The state of MA, on the other hand, would be allocated 6.72% of the additional quota under the status quo with no trigger, but quota allocation after the trigger threshold would increase to 7.50% under the trigger sub-alternative.

When an additional 100,000 lbs. is allocated under the trigger vs. the non-trigger status quo, average revenues decrease for NC, ME and NH, when averaged across all state allocation alternatives (Figure 8). On average, NC revenues would decrease by $7,912, ME by $167, and NH by $101. It should be noted, however, that whether a state earns increases or decreases in revenues varies across the allocation alternatives. For example, RI would earn a revenue increase of $2,854 under 3a-2 (i.e., the five-year allocation) but a decrease in revenues (-$1,275) under 3a-3 (i.e., the ten-year allocation). The highest increases in revenues when averaged across the alternatives are earned by MA, NJ and VA with increases of $3,430, $2,508, and $1,378, respectively.

This analysis highlights the variation in economic outcomes and their dependence on the allocation sub-alternatives proposed in section 6.3. Though triggers would impact the initial allocation of the quota, this analysis assumes that each state will fully utilize their allocated quota with no state-to-state transfers. If additional allocations resulting from the trigger method are not utilized and transfers are to continue, there may be little change in landings/revenues and the burden of transfers will be the main economic consequence of this sub-alternative.

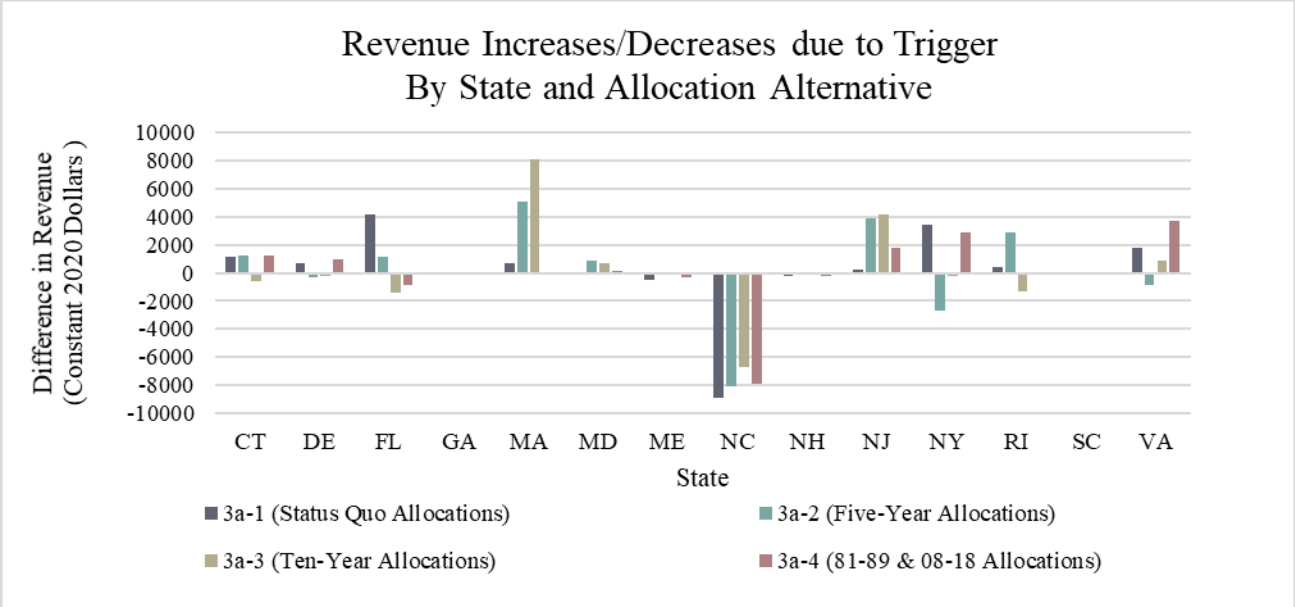


Figure 8: Differences in commercial bluefish revenues (2020 constant dollars) resulting from trigger-induced allocations by state and state-level allocation sub-alternative.

6.4 Minimum Default Allocations

6.4.1 Minimum Default Allocation Alternatives

This alternative set would establish minimum default commercial quota allocations for each state within the bluefish management unit. A minimum default allocation provides each state with a fixed minimum percentage allocation of the coastwide commercial quota, and the remainder would be allocated based on the commercial allocation alternative selected from section 6.1.1. The minimum default allocation alternatives are presented in Table 13. If 0.1% (3d-2) is selected, 1.4% of the allocation would be evenly distributed amongst the 14 states within the bluefish management unit. Then, the remaining 98.6% of the commercial quota would be distributed in accordance with the preferred alternative in section 6.1.1. If 0.25% (3d-3) is selected, 3.5% of the allocation would be evenly distributed to the 14 states. Then, the remaining 96.5% of the commercial quota would be distributed following the preferred alternative in section 6.1.1. Table 14 and Table 15 present the final state allocations with the incorporated minimum default allocations of 0.10% and 0.25%, respectively.

Table 13: Minimum default allocation alternatives.

Minimum Default Allocation Alternatives	
3d-1	No Action/Status quo: No Minimum Default Allocation
3d-2	0.10% Minimum Default Allocation
3d-3	0.25% Minimum Default Allocation

Table 14: State-by-state commercial bluefish allocations along the U.S. Atlantic coast using different proposed time series and a minimum default allocation of 0.10%.

3d-2		0.10% Minimum Default Allocation			
State	**No Action 1981-1989**	**Status quo 1981-1989**	**5-year 2014-2018**	**10-year 2009-2018**	**1/2 '81-'89 1/2 '09-'18**
ME	0.67%	0.76%	0.10%	0.11%	0.58%
NH	0.41%	0.50%	0.13%	0.22%	0.42%
MA	6.72%	6.73%	10.59%	10.12%	7.65%
RI	6.81%	6.81%	11.74%	9.61%	7.58%
CT	1.27%	1.35%	1.26%	1.09%	1.28%
NY	10.39%	10.34%	20.12%	19.76%	12.93%
NJ	14.82%	14.71%	11.17%	13.85%	14.46%
DE	1.88%	1.95%	0.67%	0.49%	1.55%
MD	3.00%	3.06%	1.57%	1.92%	2.75%
VA	11.88%	11.81%	4.65%	5.87%	10.22%
NC	32.06%	31.71%	31.71%	32.03%	31.78%
SC	0.04%	0.14%	0.10%	0.10%	0.13%
GA	0.01%	0.11%	0.10%	0.10%	0.11%
FL	10.06%	10.02%	6.08%	4.78%	8.57%

Table 15: State-by-state commercial bluefish allocations along the U.S. Atlantic coast using different proposed time series and a minimum default allocation of 0.25%.

3d-3		0.25% Minimum Default Allocation			
State	No Action 1981-1989	Status quo 1981-1989	5-year 2014-2018	10-year 2009-2018	1/2 '81-'89 1/2 '09-'18
ME	0.67%	0.90%	0.25%	0.26%	0.72%
NH	0.41%	0.65%	0.28%	0.36%	0.56%
MA	6.72%	6.73%	10.52%	10.05%	7.64%
RI	6.81%	6.82%	11.65%	9.56%	7.57%
CT	1.27%	1.48%	1.39%	1.22%	1.40%
NY	10.39%	10.28%	19.85%	19.49%	12.80%
NJ	14.82%	14.55%	11.09%	13.70%	14.31%
DE	1.88%	2.06%	0.81%	0.64%	1.67%
MD	3.00%	3.15%	1.69%	2.03%	2.84%
VA	11.88%	11.71%	4.71%	5.89%	10.16%
NC	32.06%	31.19%	31.19%	31.50%	31.25%
SC	0.04%	0.29%	0.25%	0.25%	0.28%
GA	0.01%	0.26%	0.25%	0.25%	0.26%
FL	10.06%	9.96%	6.10%	4.83%	8.54%

6.4.2 Impacts of Minimum Default Allocation Alternatives

Minimum default allocations were proposed to ensure states currently allocated a small share of the coastwide commercial quota do not lose their entire allocation through the re-allocation process. ME, NH, SC, and GA stand to benefit most from the implementation of a minimum default commercial allocation. All four of these states are currently allocated less than 1% of the coastwide quota. Furthermore, the allocation alternatives under consideration in Section 6.1.1 would provide these states with allocations close to 0%. The commercial fisheries in these states are quite small, but bluefish are still occasionally landed. Without a sufficient share of the commercial quota, fishermen operating within ME, NH, SC, and GA waters may be forced to discard incidental bluefish catch or travel further to offload landings in another state. The adoption of a minimum default allocation may reduce these negative biological and economic impacts. In addition, bluefish are historically a cyclical species and highly migratory. States like Maine and New Hampshire may encounter bluefish more in the future due to distribution shifts in the bluefish population. If this occurs, these two northern states would be afforded a small allocation that would allow some harvest of bluefish.

Alternatives 3d-2 and 3d-3 provide for minimum default allocations to states of 0.10% and 0.25%, respectively. Relative to the status quo/no action alternative, 3d-1, these minimum default allocations may result in neutral to low positive social impacts on state commercial bluefish stakeholders, depending upon the alternative selected from the 3a set. The difference between 3d-2 and 3d-3, however, is relatively small in terms of default percentages and thus the difference in social impacts between these two alternatives is anticipated to be neutral or negligible.

Economic Impacts

Differences in state bluefish revenues resulting from allocations with minimum defaults vs. allocations without the minimum defaults are calculated across the various state-allocation alternatives proposed (3a-1 through 4). Revenues are estimated and compared across both of the proposed minimum defaults (0.10% and 0.25%). Landings for each allocation series (3a-1 to 3a-4) are simulated using historic pre-sector transfer quota quantities given that pre-sector transfer allocations are closer to realized landings relative to post-transfer quantities (1999-2019) and the assumption that all allocated quota is landed is necessary for the analysis. The simulated allocated quota, and therefore estimated landings, for each series is multiplied by the average state ex-vessel bluefish price. Average annual state bluefish prices ($/lb) are used rather than an econometric model as a peer-reviewed state-level annual price model has yet to be developed. The use of average state bluefish prices omits the inverse relationship between price and quantity of bluefish landed, which is a limitation of this specific analysis. The average difference in revenues under minimum default allocations and their non-minimum default counterparts are presented in Figure 9.

In terms of revenue gains or losses, NC's revenues decrease the most under the minimum default allocation, with average losses of $55K and $137K for the 0.10% and 0.25% minimum defaults, respectively (Figure 9). This is followed by NY and NJ where revenues decrease on average by $29K and $19K under the 0.10% minimum default and $66K and $49K under the 0.25% minimum default for NY and NJ, respectively. The states with the highest increases in revenues are NH, ME, GA and SC. This is not surprising given that these states have the lowest allocations across all of the state-level reallocation plans, all of which are allocated under 1% of the commercial quota on when averaged across the non-minimum default allocations. SC, GA, ME and NH earn average annual revenue increases of $21K, $21K, $25K and $25K under the 0.10% minimum default and $52K, $52K, $62K and $62K under the 0.25% minimum default, respectively. Revenues for the states not mentioned previously range from an average decrease of $8K to average increase of $17K for the 0.10% minimum default and an average decrease of $15K to average gain of $41K under the 0.25% minimum default when summarized across all proposed state-level allocation alternatives. Lastly, if transfers are to occur and if the states receiving minimum allocations are not projected to land their quota, it is possible for quota transfers to counteract the decreases in revenue stemming from minimum default allocations.

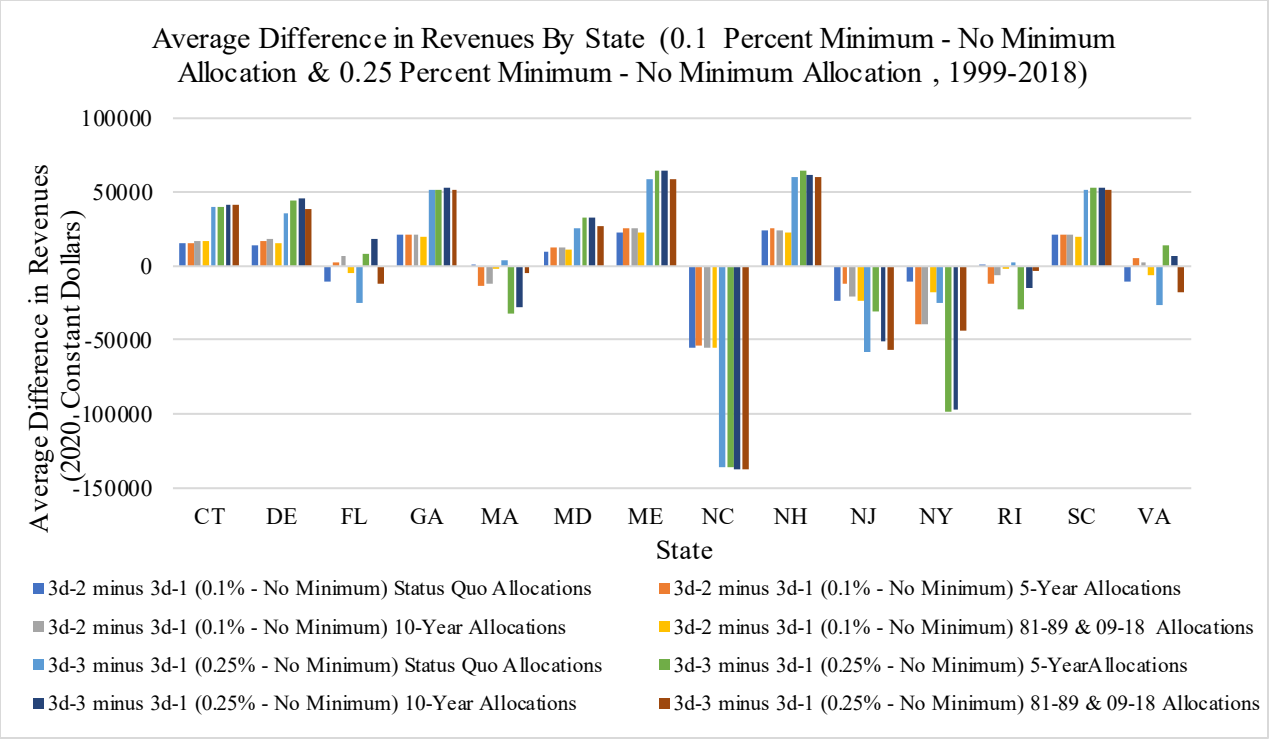


Figure 9: Average difference in commercial bluefish revenues under minimum default allocations and no minimum default allocations (1999-2019) by commercial allocation alternative and state.

7.0 REBUILDING PLAN ALTERNATIVES AND IMPACTS

The 2019 operational stock assessment indicates that the bluefish stock is overfished, but overfishing was not occurring in 2019 [9]. Section 304(e)(3) of the MSA states: "Within 2 years after…notification…the appropriate Council…shall prepare and implement a fishery management plan, plan amendment, or proposed regulations…to end overfishing immediately in the fishery and to rebuild affected stocks of fish…" Furthermore, the MSA states that FMPs shall "contain the conservation and management measures… necessary and appropriate for the conservation and management of the fishery to prevent overfishing and rebuild overfished stocks, and to protect, restore, and promote the long-term health and stability of the fishery." If adequate progress is not made through the rebuilding plan, the regional office will immediately make revisions necessary to achieve adequate progress. NOAA Fisheries technical guidance on MSA National Standard 1 recommends that in these situations the rebuilding fishing mortality proxy (F) be set at 75% of the target F. This means that if the selected rebuilding plan is demonstrating difficulty in achieving the target on time, F may be further decreased to achieve a rebuilt stock.

Spawning stock biomass (SSB) was estimated to be 91,041 metric tons in 2018, or 46% of the SSB target. The biomass target is the SSB associated with the F that achieves maximum sustainable yield (MSY) or SSB_{MSY} proxy. Under a rebuilding plan, the stock will be considered rebuilt once SSB reaches the SSB_{MSY} proxy equal to 198,717 mt (Figure 10). Once rebuilt, the MSY proxy is

[9] 2019 Bluefish Operational Stock Assessment Report

estimated to be 26,677 mt. Total fishing mortality is also available for reference (Figure 11). Again, MSA requires the overfished stock to be rebuilt within 10 years once the regional office notifies the Council of the overfished state. Under the current amendment timeline, the rebuilding plan would be implemented at the beginning of 2022.

In mid-2021, a management track assessment will be conducted to re-assess the bluefish stock. As a result of this assessment, the biological reference points may shift. Moreover, rebuilding projections will be rerun to reflect the updated status of the stock. Then, Council and Commission staff will work with the NOAA Fisheries regional office and the Scientific and Statistical Committee (SSC) to identify how these new projections will be translated into future specifications.

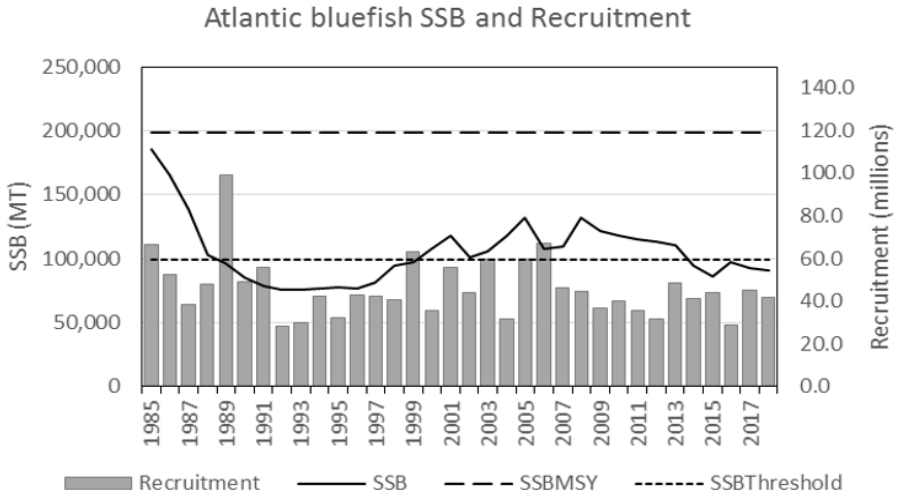


Figure 10: Atlantic bluefish SSB and recruitment at age 0 (R; gray vertical bars) by calendar year. The horizontal dashed line is the updated SSBMSY proxy = SSB40% = 198,717 mt.

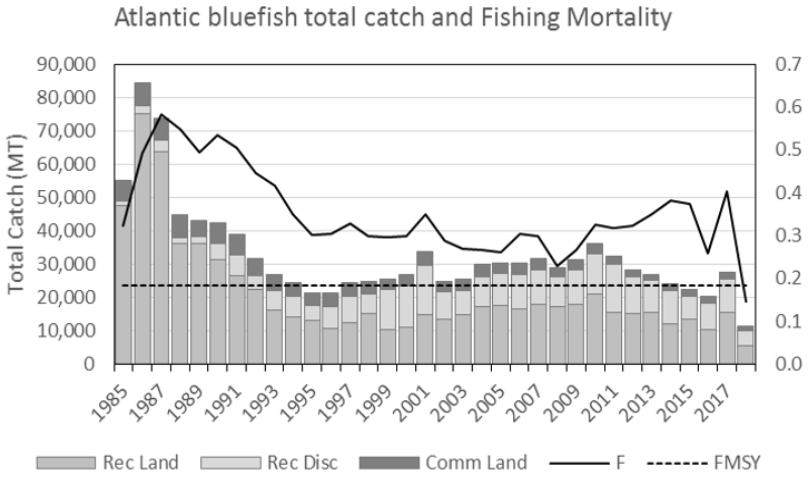


Figure 11: Total fishery catch (metric tons; mt; solid line) and fishing mortality (F, peak at age 3; squares) for Atlantic bluefish. The horizontal dashed line is the updated FMSY proxy = F35% = 0.183.

7.1 Rebuilding Plan Alternatives

This section introduces the four rebuilding plan alternatives under consideration, including status quo (Table 16). SSB values and catch projections are provided for reference for each of the three rebuilding plans. The proposed rebuilding plans assume all the projected catch will be caught. Regardless of which alternative is selected, the stock assessment scientist will perform assessment updates and rerun projections every two years. Each projection is based on current stock status information, meaning the catch values are subject to change depending upon the latest assessment. The SSC will then use the projections to develop recommendations for the specification packages that remain in line with the goals of the rebuilding plan.

Table 16: Rebuilding projection alternatives and the duration until rebuilt.

Alternative	Rebuilding Plan	Duration	Adjustment to Council Risk Policy
4a	No Action/ Status Quo	N/A	N/A
4b	Constant Harvest	4 years	No
4c	P* (Council Risk Policy)	5 years	N/A
4d	Constant Fishing Mortality	7 years	Yes

All rebuilding alternative sections contain tables detailing the biomass levels, fishing mortality, catch, SSB_{MSY} proxy, and $SSB_{Threshold.}$ The P* approach includes all the same metrics, but in terms of the projected ABCs. Table 17, Table 18, and Table 19 all begin in 2019 despite the rebuilding plans beginning in 2022. These data are presented for reference to display the assumed catch values when the projection was run in 2020.

7.1.1 No Action/Status quo (Alternative 4a)

The no action/status quo alternative would not initiate a rebuilding plan, no changes to the current risk policy would occur, and the current specifications would remain in place, as described in the proposed rule for the 2021 specifications package [10].The Council is legally bound to develop a rebuilding plan and this alternative is included as a formality.

7.1.2 Constant Harvest – 4-year Rebuilding Plan (Alternative 4b)

The 4-year constant harvest rebuilding alternative specifies that the stock be rebuilt by the end of 2025. The rebuilding plan projection presented in Table 17 and Figure 12 demonstrates that the projected catch and SSB values remains constant across the four years. However, as previously mentioned, the stock assessment scientist will conduct assessment updates and rerun projections every 2 years, which means the catch values may be adjusted up or down depending upon the assessment results. This alternative does not require an adjustment to the Council's risk policy because the catches are less than those described under the P* approach. In 2022, fishing mortality rates peak at F=0.064, but still remains below the overfishing threshold (MSY Proxy above 0.183). Rebuilding projections indicate that this alternative would be expected to rebuild bluefish to slightly above the SSB_{MSY} proxy as defined in the recent bluefish operational assessment (198,717 mt) by 2025.

[10] https://www.federalregister.gov/documents/2020/11/05/2020-24364/fisheries-of-the-northeastern-united-states-atlantic-bluefish-fishery-2021-bluefish-specifications.

Figure 12: Rebuilding plan projections including catch (top) and SSB (bottom) for alternatives 4b, 4c, and 4d.

Table 17: Constant harvest projection to rebuild over 4 years.

Year	SSB (MT)	Recruits (000s)	F	Catch (MT)	SSBMSY (MT)	SSBthreshold (MT)
2019	92,779	43,282	0.279	22,614	198,717	99,359
2020	102,165	43,455	0.087	7,385	198,717	99,359
2021	115,085	43,428	0.075	7,385	198,717	99,359
2022	137,450	43,460	0.064	7,385	198,717	99,359
2023	162,495	43,353	0.052	7,385	198,717	99,359
2024	197,141	43,239	0.045	7,385	198,717	99,359
2025	229,121	43,379	0.039	7,385	198,717	99,359

7.1.3 P* Council Risk Policy – 5-year Rebuilding Plan (Alternative 4c)

The 5-year P* Council risk policy rebuilding alternative specifies that the stock be rebuilt by the end of 2026. The catch values shown in Table 18 are in accordance with the ABC control, which is guided by the Council's risk policy. Figure 12 provides a visual of catch and SSB rebuilding over the 5-year period. In 2022, the probability of overfishing is 29%. This coincides with a projected fishing mortality rate of F=0.098, which remains below the overfishing threshold (FMSY proxy = F35% = 0.183). Rebuilding projections indicate that this alternative would be expected to rebuild bluefish to slightly above the SSB_{MSY} proxy as defined in the recent bluefish operational assessment (198,717 mt) by 2026. As previously stated, the ABC values presented in Table 18 are based on the 2019 operational assessment and are subject to revision following each stock assessment update.

Table 18: Rebuilding projection based on P* using the Council's risk policy to rebuild over 5-years.

Year	OFL Total Catch (MT)	ABC Total Catch (MT)	ABC F	ABC Pstar	ABC SSB (MT)	SSBMSY (MT)	SSBthreshold (MT)
2019	15,368	22,614	0.280	0.183	92,732	198,717	99,359
2020	16,212	7,385	0.087	0.207	102,174	198,717	99,359
2021	17,205	7,385	0.075	0.239	115,012	198,717	99,359
2022	20,237	11,222	0.098	0.291	135,586	198,717	99,359
2023	23,998	15,181	0.113	0.338	154,257	198,717	99,359
2024	26,408	18,653	0.127	0.394	176,619	198,717	99,359
2025	28,807	23,048	0.144	0.431	191,063	198,717	99,359
2026	30,848	26,677	0.157	0.450	207,619	198,717	99,359

7.1.4 Constant Fishing Mortality – 7-year Rebuilding Plan (Alternative 4d)

The 7-year constant fishing mortality rebuilding plan alternative specifies that the fishing mortality rate be set constant across the duration of the rebuilding period with a rebuilt date set for 2028. Table 19 presents the project catch and SSB values associated with the rebuilding plan and Figure 12 presents catch and SSB over time. Starting in 2022 and for the duration of the rebuilding plan,

the fishing mortality rate is projected to be at F=0.166, which remains below the overfishing threshold. However, because these catches are higher than the P* catches described in 4c, the Council would also adjust its risk policy for this rebuilding plan. The Council's current risk policy states that the SSC should provide ABCs that are the lesser of rebuilding ABCs or standard risk policy (P*) ABCs (4c follows the current P* approach). The P* catches in 4c are lower than 4d. In absence of a risk policy adjustment, ABCs prescribed under alternative 4c would override those in 4d. The adjustment to the Council risk policy would be limited to only bluefish for this specific rebuilding alternative. Approval of this adjustment to the risk policy is necessary for the implementation of any rebuilding plan exceeding five years with the associated higher catches. Rebuilding projections indicate that this alternative would be expected to rebuild bluefish to slightly above the SSB_{MSY} proxy as defined in the recent bluefish operational assessment (198,717 mt) by 2028. As previously discussed, the catch values produced by the projection are subject to change following new stock assessment information.

Table 19: Constant 7-year F rebuilding projection.

Year	SSB (MT)	Recruits (000s)	F	Catch (MT)	SSBMSY (MT)	SSBthreshold (MT)
2019	92,755	43,320	0.279	22,614	198,717	99,359
2020	102,186	43,531	0.087	7,385	198,717	99,359
2021	115,073	43,310	0.075	7,385	198,717	99,359
2022	132,150	43,390	0.166	18,477	198,717	99,359
2023	143,271	43,292	0.166	20,813	198,717	99,359
2024	158,152	43,272	0.166	22,033	198,717	99,359
2025	168,006	43,395	0.166	23,532	198,717	99,359
2026	182,311	43,336	0.166	25,121	198,717	99,359
2027	191,855	43,578	0.166	26,191	198,717	99,359
2028	198,520	43,411	0.166	26,939	198,717	99,359

7.2 Impacts of Rebuilding Plan Alternatives

All proposed alternatives, with the exception of no action, are projected to rebuild the stock to the SSB_{MSY} proxy biomass target of 198,717 by 2028 or earlier. The catch values associated with each rebuilding plan scale up with the duration of the rebuilding period. The recreational and commercial sectors are likely to experience significantly different impacts from each rebuilding plan considering the varied duration and projected catch values.

When comparing impacts of the three rebuilding plans, individuals need to consider how a longer rebuilding timeline will affect ABCs, fishing mortality rates, and the resulting ACL, which may be constrained with various management measures, if necessary.

Social Impacts

Alternative 4a is the status quo alternative under which no action would be taken to initiate a rebuilding plan and therefore the bluefish stock would remain in an overfished state. It is likely that there would be negative social impacts from the no action alternative due to the negligence of the MAFMC to comply with its legal obligation to develop a rebuilding plan when a stock is overfished. This would likely lead to an erosion of trust and confidence among stakeholders across

user groups in the ability of the MAFMC to handle its responsibilities to ensure the equitable sustainability of the bluefish resource. According to the written and oral comments provided during the scoping process, about 40% of commenters supported some type of rebuilding plan. By contrast, about 21% doubted the overfished status of the stock or viewed the stock status as "cyclical," and 17% reported that they believed the stock to be affected by environmental factors and more research is needed on those issues. These stakeholder perspectives indicate that a plurality of resource users would prefer the MAFMC take action on rebuilding the stock, but the approach in doing so would need to be carefully considered in terms of its impacts and equitability for stakeholders across user groups.

Under alternative 4b, a constant harvest approach would be utilized until the stock is rebuilt. The projected date for the stock to be rebuilt under this scenario is the end of 2025 (4 years). This approach applies perhaps the most constraining rebuilding plan given that catch would be set at a constant level of 7,385 mt over the four-year period. Relative to the no action alternative, alternative 4b would have positive social impacts due to the MAFMC implementing a rebuilding plan as it is legally required to do, but this approach may have neutral to negative social impacts relative to the other rebuilding plan alternatives under consideration. Most commercial crew and hired captains reported through Crew Survey results that they believed the rules and regulations in their primary fisheries have been too restrictive. If the projection holds and the stock is rebuilt in four years, however, the potential negative impacts may be offset by an improved stock status and likely increases in catch thereafter, subject to constraining fishing mortality below the threshold.

Alternative 4c would utilize the MAFMC risk policy (P*) to rebuild the stock. This approach is projected to rebuild the stock by the end of 2026 (i.e., a 5-year rebuilding plan). Under this alternative, there would likely be positive social impacts relative to the no action alternative and positive impacts relative to alternative 4b, the four-year rebuilding plan. Alternative 4c provides for more catch over the course of the rebuilding plan, thus allowing more flexibility for stakeholders across user groups to continue to access the resource and potentially preserve employment and income opportunities in the short term as the stock is being rebuilt.

Under alternative 4d, the rebuilding plan would follow a constant fishing mortality approach through which the stock is projected to be rebuilt by the end of the year in 2028 (i.e., a 7-year rebuilding plan). This alternative would likely produce positive social impacts relative to the no action alternative and alternative 4b but might result in only neutral to low positive impacts relative to alternative 4c. While the amount of allowable catch is higher in the short term than under alternative 4c, the additional time to rebuild the stock might reduce the opportunities for employment and income from the bluefish resource over the longer-term relative to a shorter rebuilding plan target. However, if alternative 4d provides the greatest probability of rebuilding the stock then the potential negative impacts relative to alternative 4c might be negated by the benefits of a rebuilt stock for stakeholders to utilize across the spectrum of resource user groups. Additionally, most crew and hired captains interviewed through the Crew Surveys reported that the rules and regulations change so quickly that it can be hard to keep up. A longer rebuilding period with more gradual changes to allowable catch might reduce the amount of uncertainty in fishing business decisions and thus mitigate potential negative social impacts of a rebuilding plan.

Economic Impacts

Forecasted bluefish commercial landings and revenues are compared across the 4-year (alternative 4b), 5-year (alternative 4c), and 7-year (alternative 4d) rebuilding schedules. Landings and

revenues are estimated from 2019 to 2028 for each rebuilding plan with the expectation that each plan will be implemented in 2022. Landings and revenues for 2019 and 2020 in this analysis were based off of the values used in the projections and likely differ from 2019 and 2020 realized values because the projections were conducted before final data for these years were made available Moreover, rebuilding projections will continue to be revised every two years as the assessment is updated. For plans which indicate the stock will be rebuilt in less than 7 years, the ABC upon rebuilding the stock is assumed to equal 26,677 mt (58.8 M lbs.) [11] for the remaining years in the time series, allowing for meaningful comparison between rebuilding schedules. For each plan, a minimum and maximum commercial allocation percentage was used to simulate allocations (11% and 17%, respectively, as proposed by alternatives 2a-1 and 2a-2). This analysis assumes that all allocated commercial quota is landed in each forecasted year. Revenue streams are estimated using the predicted landings and ex-vessel bluefish prices are predicted using the modeling methods and parameters specified in Appendix B. Once estimated, future revenues streams are discounted to obtain present values for each rebuilding plan. Discounting revenue streams accounts for the time value of money when assessing future benefits. We present three different discount rates (0%, 3% and 7%) which are applied to the forecasted revenue streams. [12] The 0% discount rate serves as a baseline, while the 3% and 7% discount rates are suggested by NOAA's Social Rate of Time Preference (NOAA 1999) and the Executive Branch's Office of Management and Budget Circular No. A-94 discounting recommendations, respectively.

Trends in landings by rebuilding plan are shown in Figure 13 while average landings are summarized in Figure 14, where A and B represents the 11% and 17% commercial allocations for each figure, respectively. Alternative 4b (i.e., the 4-year plan) had the lowest overall landings in terms of average landings (3.6 M lbs and 5.5 M lbs under the 11% and 17% commercial allocations, respectively). Alternative 4d had the highest average annual landings with averages of 4.9 M lbs and 7.5 M lbs under the 11% and 17% commercial allocations, respectively.

Discounted revenue streams across the various rebuilding timelines are shown in Figure 15, where the three discount rates (0%, 3% and 7%) are applied to the 11% commercial quota allocations for panels A-C and to the 17% commercial allocations in panels D-F. Additionally, average revenues by plan are presented in Figure 16 where panels A and B refer to the 11% and 17% commercial quota allocations, respectively. The highest average annual revenues by rebuilding plan follow trends similar to those of the landings results. Average annual revenues for alternative 4b range from $1.8 M-$2.7 M and $2.8 M-$4.2 M across the discounted revenue streams under the 11% and 17% commercial allocations, respectively. The highest average annual revenues range from $2.2 M-$3.3 M and $3.5 M-$5.1 M across the three discount rates under the 11% and 17% commercial allocations, respectively. Overall, alternative 4d (i.e., 7-year schedule) has the highest economic benefits and alternative 4b (i.e., 4-year schedule) the lowest, in terms of average annual bluefish landings and revenues.

Without a demand model, it is unclear how the proposed rebuilding plans will impact recreational bluefish fishing effort. However, given the high catch and release nature of the fishery, there is likely to be little shift in the demand for recreational fishing given the changes in proposed ABCs

[11] The 26,677 MT quantity is the terminus year of the 5-year rebuilding projection based on P* using the Mid-Atlantic Fishery Management Council's rebuilding risk policy.
[12] The discount rate is a highly disputed topic in the field of economics. The discount rates presented are used to ensure that a low and high discount rate is accounted for when presenting results.

by the rebuilding plans. Any increases in recreational TAL may have a slight positive economic impact in possibly more for-hire trips which may have higher value on catching and retaining fish. It is overall unclear to what degree recreational effort and angler expenditures will be impacted by the proposed rebuilding plans.

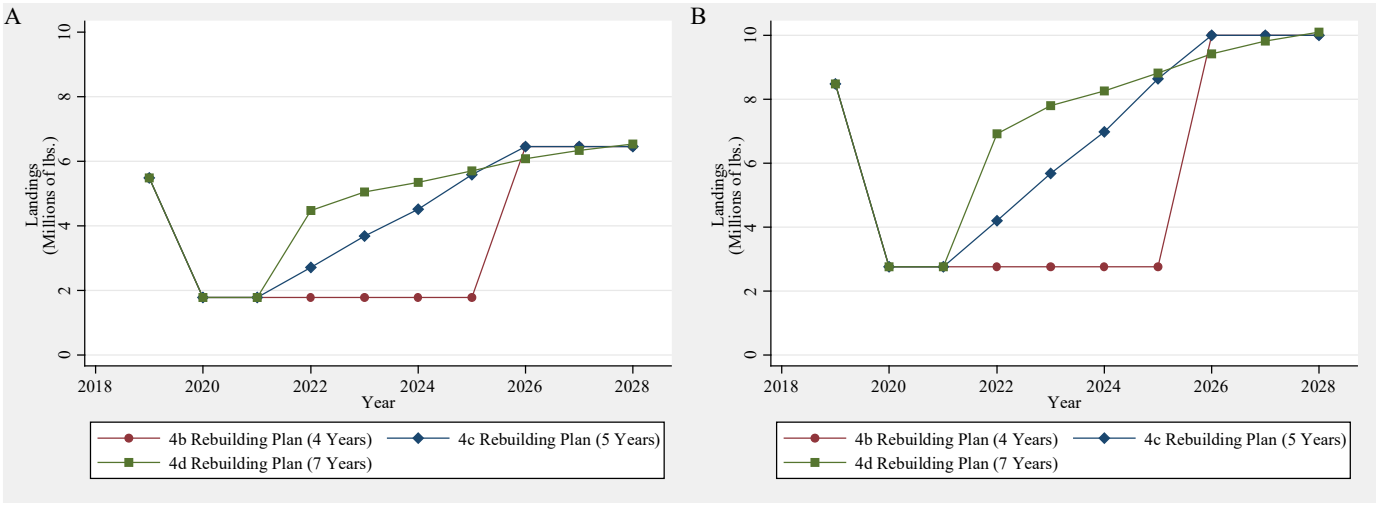


Figure 13: Projected commercial bluefish landings under an 11% and 17% commercial sector allocation (A and B, respectively) by rebuilding plan for years 2019-2028.

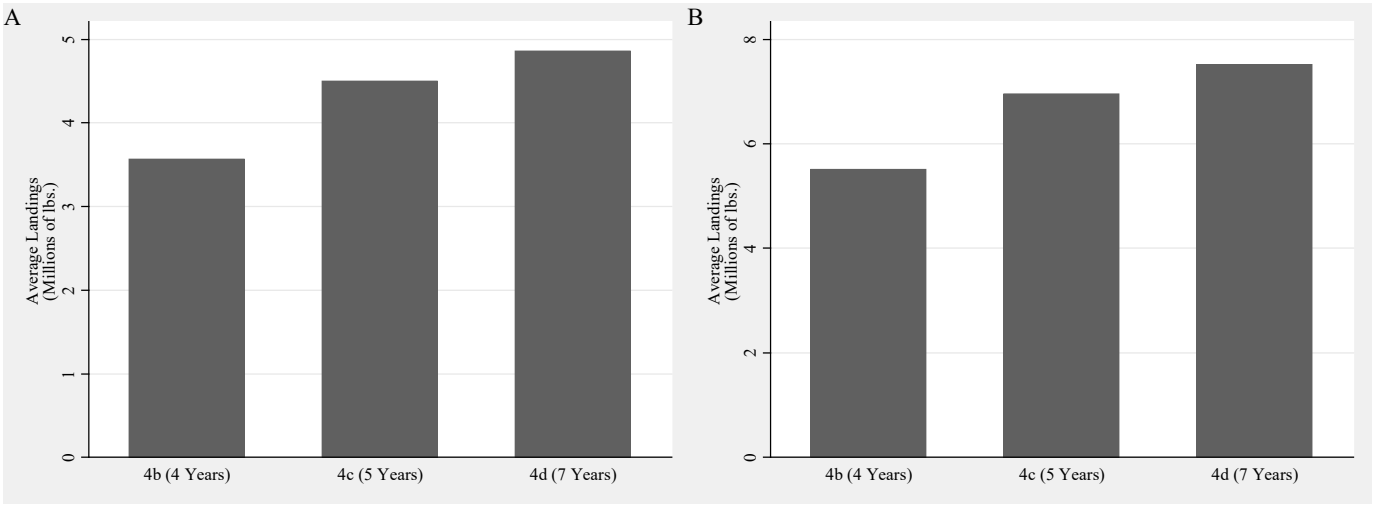


Figure 14: Average projected commercial bluefish landings (2019-2028) under an 11% and 17% commercial sector allocation (A and B, respectively) by rebuilding plan.

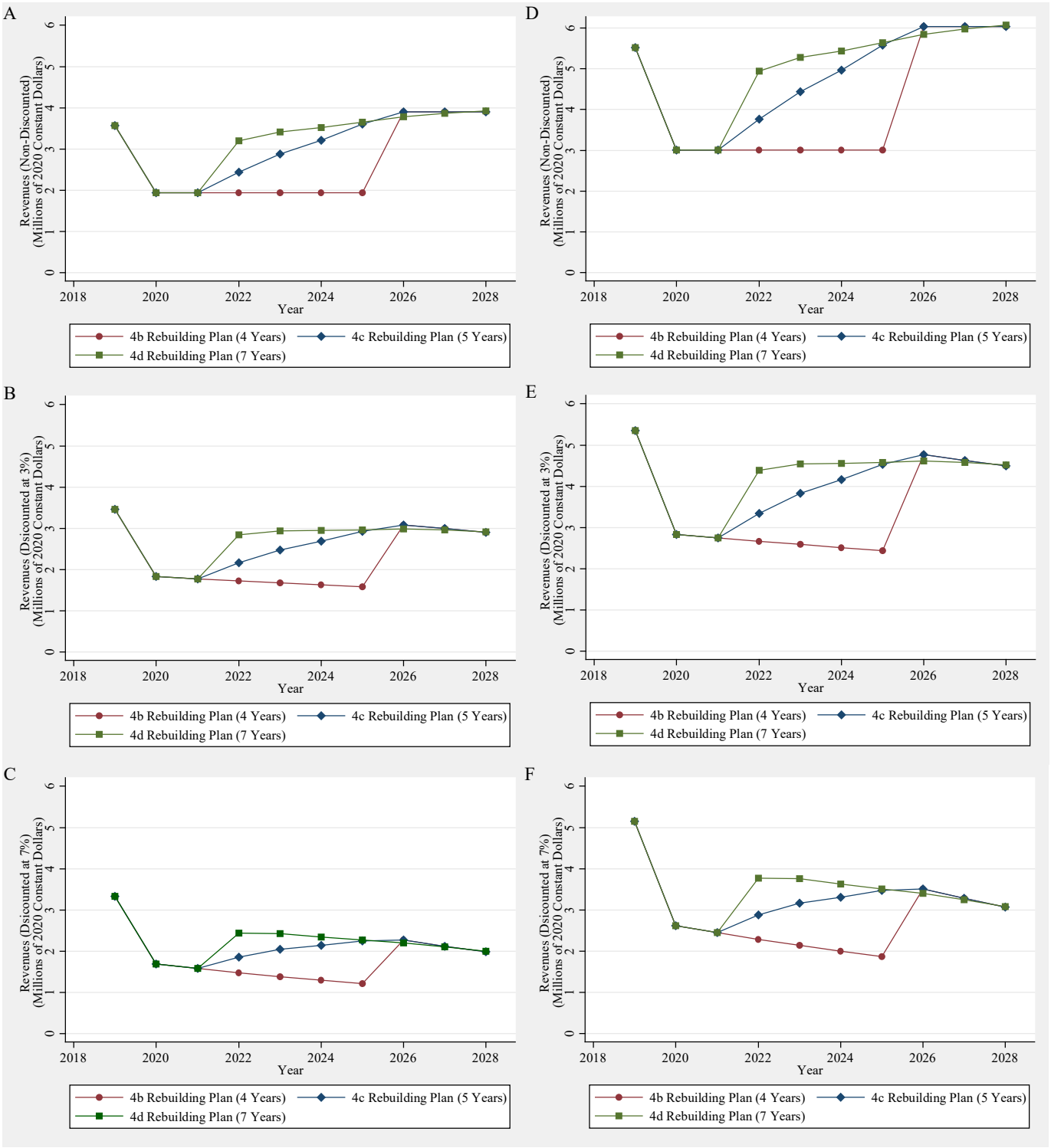


Figure 15: Estimated commercial bluefish revenues under 11% (A-C) and 17%(D-F) commercial allocations and discounted at 0%, 3%, and 7% by rebuilding plan and year (2019-2028).

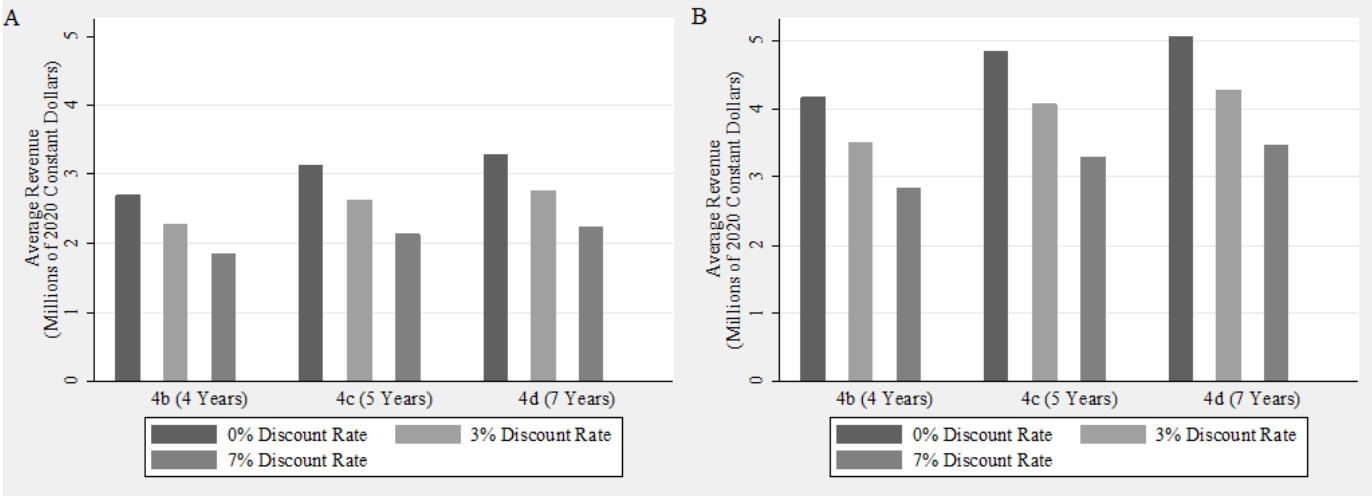


Figure 16: Average annual commercial bluefish revenues (2019-2028) discounted at 0%, 3% and 7% by rebuilding alternative and under 11% (A) and 17% (B) commercial quota allocations.

8.0 QUOTA TRANSFER ALTERNATIVES AND IMPACTS

The following alternatives describe options for allowing annual transfer of quota between the commercial and recreational sectors as part of the specifications setting process (i.e., the annual process of setting or reviewing catch and landings limits for the upcoming fishing year). Section 8.1 discusses quota transfer process alternatives while Section 8.2 addresses options for a cap on the total amount of a transfer.

8.1 Sector Transfer Provision Alternatives

8.1.1 Sector Transfer Provision Alternatives

Alternatives under consideration for quota transfer provisions are presented in Table 20.

Table 20: Alternatives for annual transfer of quota between the commercial and recreational sectors.

Alternatives	Annual Quota Transfer Alternatives
5a-1	No Action/Status Quo
5a-2	Allow for optional bi-directional transfers through the annual specifications process with pre-defined guidelines and process. The transfer would consist of a portion of the total ABC in the form of a landings limit (i.e., commercial quota and RHL) transfer. Transfers would not occur if the stock is overfished or overfishing is occurring.

Under alternative 5a-1, transfers from the recreational to the commercial sector could continue but transfers from the commercial to the recreational sector would not be included as an option in the FMP.

Under alternative 5a-2, each year during the setting or review of annual catch limits, the Council and Board would have the ability to recommend a transfer of quota between the recreational and commercial sectors, affecting the final commercial quota and RHL. The Council and Board could recommend a transfer from the commercial fishery to the recreational fishery or from the recreational fishery to the commercial fishery. The transfer amount would not exceed the cap adopted via one of the sub-alternatives under alternative set 5b. Table 21 describes how the process of transfers works within the Council and Board's current specifications process under alternative 5a-1 and would work under alternative 5a-2.

Table 21: Quota transfer process during a typical specifications cycle under alternative 5a-1. The quota transfer process would differ slightly under alternative 5a-2 as described in the green shaded rows.

July: **Assess the need for a transfer**	Staff and the Monitoring Committee (MC) assesses the potential need for a transfer and develop recommendations to the Council and Board as part of the specifications setting or review process. The MC considers the expected commercial quota and RHL (pending Council and Board review/approval) in the coming year, and each sector's performance relative to landings limits in recent years. The MC has very limited data for the current year and is not able to develop precise current year projections of landings for each sector. The MC also considers factors including but not limited to: • Projected changes in stock size, availability, or year class strength; • Recent or expected changes in management measures; • Recent or expected changes in fishing effort; The MC considers how these factors might have different impacts on the commercial and recreational sectors. The effects of these considerations are largely difficult to quantify and there is currently no methodology that allows the MC to quantitatively determine the need for a transfer with a high degree of precision. The MC uses their best judgement to recommend whether a transfer furthers the Council and Board's policy objectives, using mostly recent trends by sector.
August: **Council and Board consider whether to recommend a transfer**	The Council and Board considers MC recommendations on transfers while setting or reviewing annual catch and landings limits. Similar to the process for jointly setting catch limits, the Council and Board needs to jointly agree on the transfer amount .
August: **Alternative 5a-2**	In addition to the steps described in the row above, the Council and Board would also need to jointly consider the direction of transfer if alternative 5b-2 were to be adopted.
October: **Council staff submits specifications package to NOAA Fisheries**	Council staff prepares and submits supporting documents if needed to modify catch limits or implement transfers.

Mid-December: **Recreational measures adopted***	The Council and Board would adopt federal waters recreational measures and a general strategy for coastwide recreational management including any reductions or liberalizations needed in state waters. These recommendations are based on the expected post-transfer RHL which are not always implemented via final rule but have usually been recommended by the Council and Board and proposed to the public.
Late December: **Final specifications published**	NOAA Fisheries approves and publishes the final rule for the following year's catch and landings limits (if new or modified limits are needed), including any transfers.
January 1: **Fishing year specifications effective, including any transfers**	Fishing year specifications including any transfers would be effective January 1.
February: **NOAA Fisheries post-implementation review and adjustment**	NOAA Fisheries compares the estimate of recreational landings for the previous year to the RHL to make any necessary adjustments before finalizing the amount of quota transferred. The adjustment notice with final specifications is usually published in March/April.
February: **Alternative 5a-2**	No post-implementation reviews and adjustments to the transfer amount would occur given the final rule would recently have published, and recreational measures would have already been considered based on expected post-transfer RHLs.

*While this step is not directly part of the quota transfer process, the timing of the recreational measures setting process influences the necessary timeline of transfer-related decisions.

If transfer provisions under alternative 5a-2 are adopted, some changes to the AMs may need to be considered. The AMs indicate that if the MC determines that a transfer from the recreational to commercial sector caused the fishery-level ACL to be exceeded, the transfer amount could be deducted from the receiving fishery in a subsequent year. The Council and Board could consider whether to include these changes in this amendment or develop a follow-up action.

8.1.2 Impacts of Sector Transfer Alternatives

The impacts of transfers depend on the frequency of transfer, the amount transferred in each year, the direction of transfer between sectors, and to what extent each sector has been or is expected to achieve their limits. The impacts of a transfer are also dependent on the marginal economic value of additional allowable landings for each sector (in terms of commercial and for-hire revenues and revenues for associated commercial and recreational businesses), as well as the positive or negative impacts on angler satisfaction that may arise from modifying or maintaining recreational measures. As described below, many additional factors can influence how the commercial and recreational fisheries may be impacted by a transfer, including market conditions, overall availability of the species, availability of substitute species, and trends in effort driven by external factors.

Commercial to Recreational Transfers

If the recreational fishery receives a transfer, they will experience positive socioeconomic impacts due to outcomes such as the potential for liberalized measures, the ability to maintain measures when a reduction may otherwise be needed, and a reduced risk of an RHL or ACL overage that

may impose negative consequences in a future year. These outcomes are likely to result in maintained or increased revenues for recreational businesses as well as improved or maintained levels of angler satisfaction, compared to if no commercial to recreational transfer occurred.

In this scenario, the commercial sector would give up quota that is not expected to be fully utilized. In theory, if the decision to transfer is based on a pattern of underutilization in the commercial sector, the economic impacts to the commercial sector from such a transfer would be neutral. However, the commercial sector could experience a loss in revenue if the potential for underutilization is incorrectly evaluated. This could be due to a disconnect in the data used to evaluate the transfer and conditions in the relevant fishing year, possibly driven by changes in market conditions or fishery participation and effort.

Impacts to the commercial fisheries are not likely to be felt equally across states given different commercial quota management systems and differing quota utilizations by state. While coastwide commercial landings can frequently fall short of the total commercial quota, individual states vary considerably in utilizing or underutilizing their individual quotas. A coastwide projected underutilization could occur even if one or more states would be expected to fully utilize their quota in the upcoming year. This could have negative economic impacts to the commercial industries in states that regularly achieve their quotas.

Recreational to Commercial Transfers

If the commercial fishery receives a transfer, they will experience positive social and economic impacts in the year of the transfer due to increased revenue earning potential associated with higher potential landings. In general, quota increases tend to result in higher revenues, although some of these benefits may be partially offset by decreases in price per pound that can be associated with higher quotas. All else held constant, transfers from the recreational to commercial sector would lead to positive impacts for the commercial sector.

In theory, if the decision to transfer is based on a pattern of underutilization by the recreational sector, negative socioeconomic impacts to the recreational sector from such a transfer may not be realized. However, this would limit the potential for liberalizing recreational management measures. Since recreational harvest is more difficult to predict and control than commercial harvest, recreational management measures are frequently adjusted in order to strike an appropriate balance between conservation and angler satisfaction.

Impacts of Transfers in Either Direction

The impacts of transfers should be considered in combination with the short-term and long-term impacts associated with commercial/recreational allocation modifications under alternative set 2. However, it is difficult to do so quantitatively given the uncertainties about allocation changes as well as the uncertainties in the frequency, amount, and direction of potential transfers. In general, any annual transfers away from a sector can compound the negative impacts experienced due to a reduction in that sector's total allocation, or in the short term could partially offset the positive impacts of an increase in allocation. Annual transfers to a sector can simultaneously create additional positive impacts on top of the positive impacts of reallocation from the perspective of the receiving sector, and also exacerbate negative impacts of a loss in allocation for the donating sector.

The impacts of transfers would also be influenced by annual reductions or increases in the overall ABC based on changes in projected stock biomass and the application of the Council's risk policy. The recipient of a transfer could have some negative socioeconomic impacts from ABC reductions mitigated by receiving a transfer, while the transferring sector may experience exacerbated negative economic impacts from ABC reductions. Conversely, if the ABC were increasing, this could offset negative impacts to the transferring sector and provide additional benefits to the sector receiving the transfer.

The impacts of transfers can also be impacted by the availability and management of substitute species for a particular sector. High availability and access to recreational or commercial substitute species would help mitigate negative impacts of a transfer away from a given sector, while lower availability and access would compound these negative effects.

Social Impacts

Under alternative 5a-1, the status quo would remain, and no action would be taken to allow for bi-directional sector quota transfers. This might result in neutral to low-negative social impacts. Some stakeholders may desire and could benefit from the flexibility to transfer unused quota across sectors in both directions whenever the need or oversupply might arise.

Under alternative 5a-2, bi-directional transfers of quota across sectors would be permissible. This alternative is anticipated to have low positive social impacts relative to the no action alternative. Allowing for bi-directional transfers across sectors might improve flexibility for stakeholders throughout the fluid and changing quota needs of various stakeholders across user groups, sectors, and state lines. This may be especially helpful for some stakeholders in light of new rebuilding plans and allocation changes, which might have disparate impacts on stakeholders depending upon their initial positions and access to the resource prior to the change in allocations and implementation of a rebuilding plan.

Economic Impacts

The economic impacts of 5a-1 (status quo, recreational to commercial sector transfers, only) are expected to continue to be more or less neutral for the recreational sector and positive for the commercial sector. The commercial sector has historically utilized a portion of the additional transferred quota by increasing landings above the initial pre-transfer commercial allocation. The additional quota transferred from the recreational sector to the commercial sector may also contribute to increases in job opportunities and/or higher paying trips for crew members along with increases in revenues. A bi-directional transfer, suggested by alternative 5a-2, would only provide positive economic impacts to the recreational sector if a future quota transfer were large enough to allow for a liberalization of recreational measures. In the absence of an increase in the bag limit resulting from a higher post-transfer RHL, the recreational sector is likely to experience negligible economic impacts. Within the commercial sector, there is a slight negative economic impact associated with a bi-directional transfer which could result from miscalculations in projected commercial landings which could limit the quantity landed by the commercial sector.

8.2 Transfer Caps

8.2.1 Transfer Cap Alternatives

The no action/status quo transfer cap alternative 5b-1 keeps the existing commercial sector transfer cap in place. If the pre-transfer commercial share of the ACL is less than 10.5 million and the Council and Board determines the need for a transfer from the recreational sector to the commercial sector, the commercial quota may be allocated up to 10.5 million lb as its quota. If the Council and Board selects alternative 5b-1 along with alternative 5a-2, which allows for bi-directional transfers, no transfer cap would be implemented for the recreational sector. Specifically, if the Council and Board determines the need for a transfer from the commercial sector to the recreational sector, the transfer amount and the RHL would not be subject to any cap.

Under alternative 5b-2, any transfer from one sector to the other would be capped at 10% of the ABC (Table 22). This approach allows quota transfers to scale with biomass. The size of the transfer cap will increase and decrease with changes in the acceptable biological catch that are associated with changes in the stock size. Unlike 5b-1, transfers could still occur even when the commercial quota is above 10.5 million pounds.

Table 22: Proposed transfer caps for sector-based transfers.

Alternatives	Transfer Cap
5b-1	No Action/Status Quo
5b-2	Up to 10% of the ABC

8.2.2 Impacts of Transfer Cap Alternatives

Alternative 5b-1 10.5 million lb cap was set through Amendment 1 and was based on the average commercial landings for the period 1990-1997. The existing transfer cap was specifically designed for one-way transfers, and as such, selecting bi-directional transfers with no action on the transfer cap does not cap transfers from the commercial sector to the recreational sector. However, due to the smaller commercial allocation it is highly unlikely that the commercial sector would ever transfer more than 10.5 million lb to the recreational sector, meaning a 10.5 million lb cap on commercial to recreational transfers would not be restrictive anyway.

Alternative 5b-2 would implement a maximum transfer cap of up to 10% of the ABC. Considering a recent time series of ABCs (Table 23), 10% of the average of ABCs from 2000-2019 would result in a sector transfer of 2.97 M lbs. This estimate is smaller than the average transfer over the same time period (4.30 M lbs). However, since alternative 5b-2 is a percentage of the total ABC, future transfer amounts would scale with biomass as bluefish continues through the rebuilding plan. By comparison, the status quo alternative will result in no transfers if the commercial quota exceeds 10.5 M lbs.

Table 23: Recreational to commercial sector transfer amounts, ABCs in million lb, and estimates of retroactive 10% transfer caps from 2000-2019.

Year	Sector Transfer Amount	ABC	10% Transfer Cap
2000	0	36.840	3.684
2001	3.150	37.840	3.784
2002	5.933	29.100	2.910
2003	4.161	39.500	3.950
2004	5.085	34.215	3.422
2005	5.254	34.215	3.422
2006	5.367	29.150	2.915
2007	4.780	32.033	3.203
2008	4.088	31.887	3.189
2009	4.838	34.081	3.408
2010	5.387	34.376	3.438
2011	4.772	31.744	3.174
2012	5.052	32.044	3.204
2013	4.686	27.472	2.747
2014	3.340	24.432	2.443
2015	1.579	21.544	2.154
2016	1.577	19.456	1.946
2017	5.033	20.642	2.064
2018	3.535	21.815	2.182
2019	4.000	21.820	2.182

Economic Impacts

The economic impact of sector transfer caps on the commercial bluefish sector are investigated by comparing realized landings data to predicted landings under a 10% ABC cap transfer scenario over 2001-2019.[13] Revenues are also estimated under these two scenarios. Ex-vessel bluefish prices are estimated using the price model and methods described in Appendix B. Revenues are estimated as opposed to incorporating realized revenues in order to establish an equal comparison between the status quo transfer cap alternative (5b-1) and the 10% ABC transfer cap alternative (5b-2) and their economic implications. Quotas under alternative 5b-2 are estimated using the historic ABC's for each year and for each of the sector allocation sub-alternatives presented in section 5.1.1 (i.e., 2a-1 to 2a-5). Then 10% of the ABC is added to the pre-transfer quantities to produce the post-transfer values. Similar to previous economic analyses, it is assumed that all allocated quota is landed when comparing the projected commercial quotas under alternative 5b-2 to the realized landings. It should be noted that in every year in the time series, realized landings have been less than the full allocation generated under the 5b-2 scenario (Figure 17). If the proposed transfer cap had been implemented over the time series, and all else was held constant, landings would not have been restricted by the transfer cap. Further, in some years (2001, 2015, and 2016) the realized post-transfer quantities are less than the 5b-2 scenario [14] such that a transfer

[13] Sector transfers occurred on an annual basis from 2001-2019.
[14] The realized sector transfer was less than 10% of the ABC.

cap equal to 10% of the ABC would not have impacted landings in these years even if the full historic post transfer landings had been fully utilized.

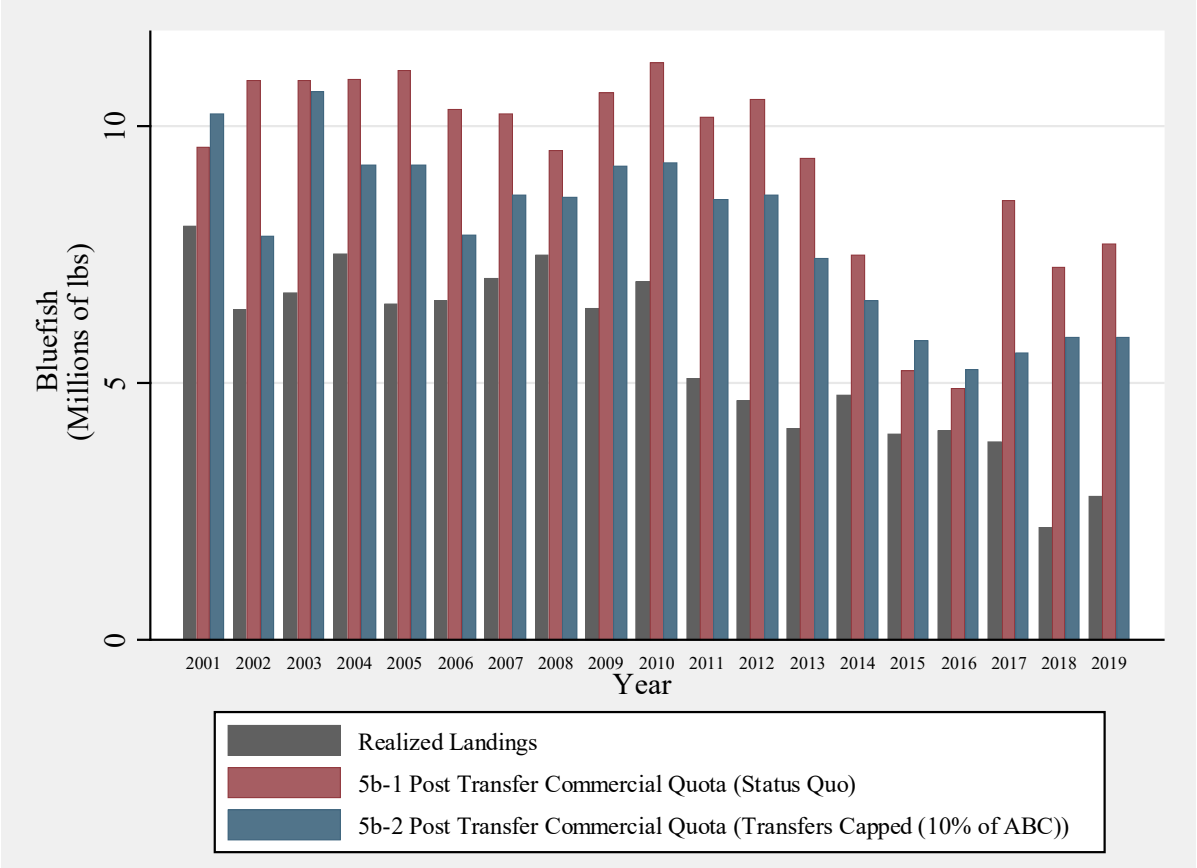


Figure 17: Realized bluefish landings, historical post-transfer commercial bluefish quotas under the status quo alternative 5b-1, and post-transfer commercial bluefish quota with a transfer cap of 10% of the ABC (5b-2) applied over 2001 to 2019.

There are only a handful of years where predicted landings under the 5b-2 transfer scenario are less than realized landings when investigated across the proposed commercial allocations described in section 5.1.1 (Figure 18). Specifically, there are only six years where predicted landings are less than realized landings, all occurring under the 2a-2 (11% commercial allocation) alternative.

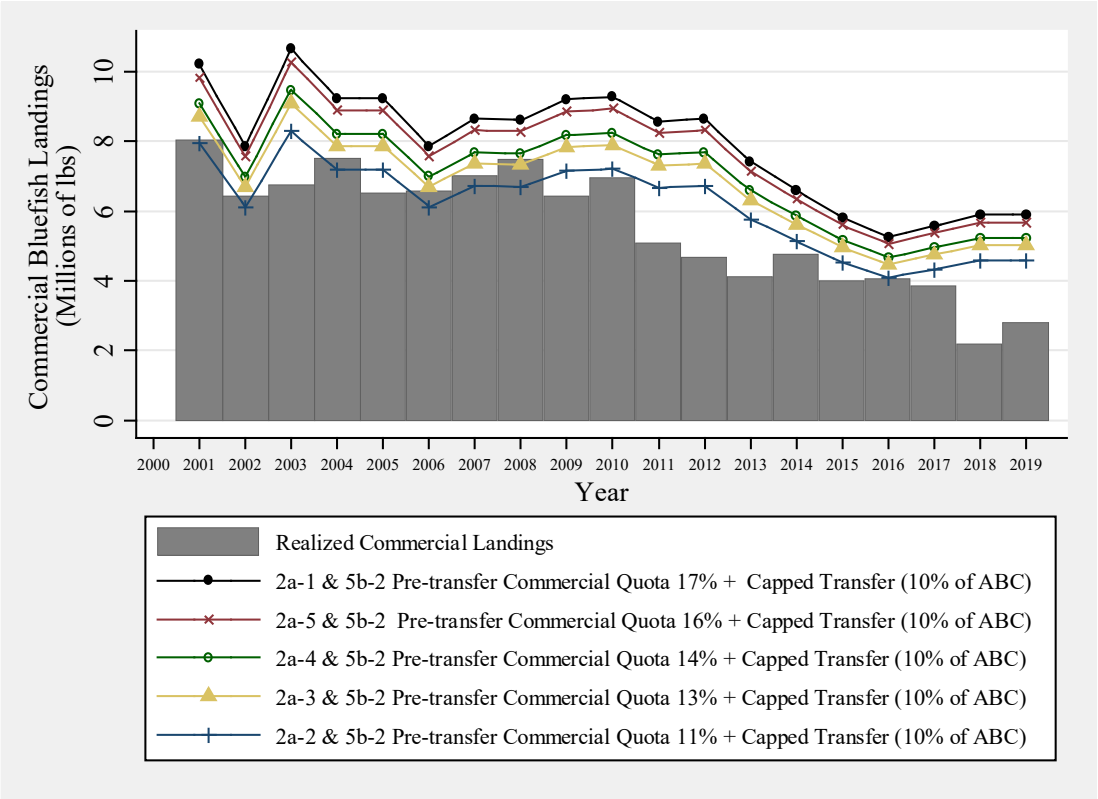


Figure 18: Realized commercial bluefish landings and predicted commercial landings under the 10% ABC cap transfer scenario across proposed commercial allocation alternatives from 2001-2019.

Despite the few instances where realized landings are less than landings predicted under the 5b-2 scenario, estimated revenues are higher under all 5b-2 landings scenarios relative to revenues estimated under the realized landings scenario (Figure 19). This result is driven by the inverse relationship between ex-vessel price and landings (described further in Appendix B). However, higher revenues under the 5b-2 transfer scenario are heavily reliant on the price model which only describes about 68% of the variability in annual prices and is informed by a limited sample size.

In summary, realized commercial bluefish landings are almost always less than the possible landings under the 5b-2 transfer scenario. In the six cases where realized landings *do* exceed landings from the capped transfer scenarios, the differences in revenue are marginal. Overall, there are few cases where bluefish landings/revenues are expected to be impacted by the implementation of a sector transfer cap of 10% of the ABC.

The economic impacts of implementing a 10% cap on sector transfers on the recreational sector of the bluefish fishery are expected to be negligible. Although, these caps would limit the transfer quantities from the commercial sector to the recreational sector, recreational harvest, effort, and expenditures are not expected to be impacted by this sub-alternative unless a sector transfer resulted in the need to adjust recreational measures. In reverse, transfers from the recreational to the commercial sector only occur when the recreational sector is predicted to harvest quantities below the recreational RHL, such that the existence of a transfer cap should not impact recreational harvest, effort, or expenditures.

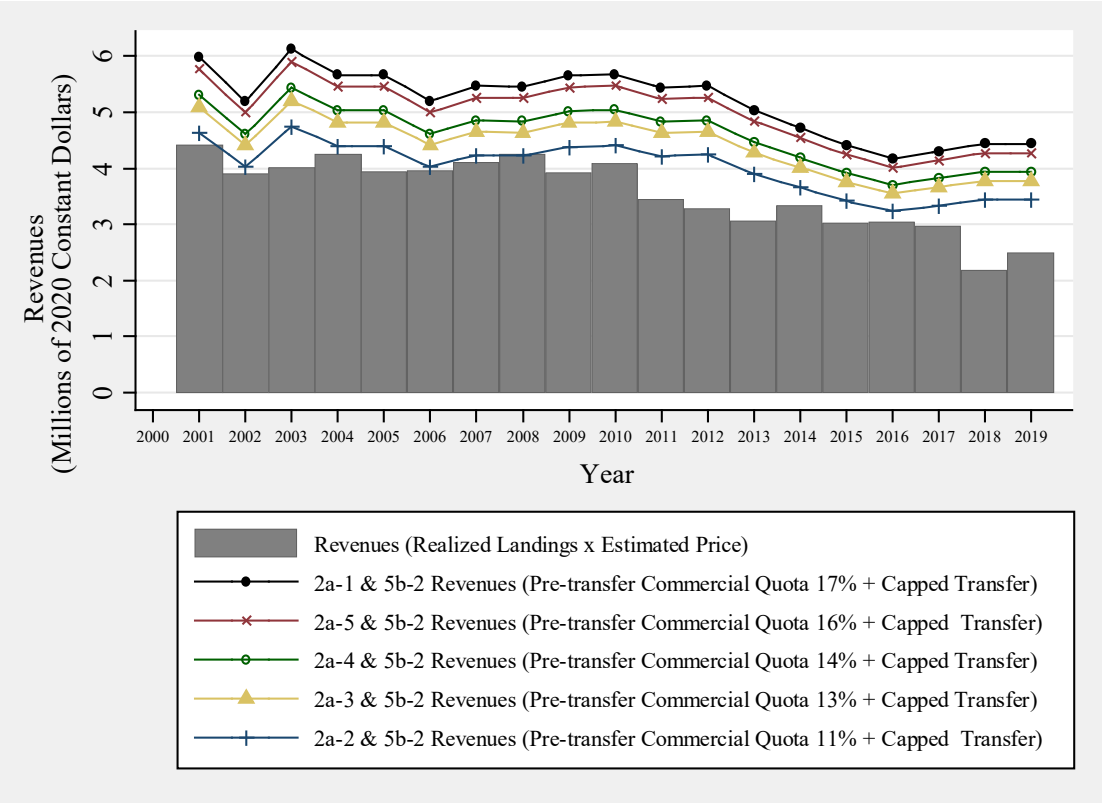


Figure 19: Estimated commercial bluefish revenues (realized landings multiplied by estimated ex-vessel bluefish price) and estimated commercial revenues under the 10% ABC cap sector transfer scenarios across proposed sector allocation alternatives from 2001-2019.

9.0 MANAGEMENT UNCERTAINTY ALTERNATIVES AND IMPACTS

9.1 Management Uncertainty Alternatives

This alternative set is included to modify how the Monitoring Committee accounts for management uncertainty (Table 24). In the current FMP, the fishery-level ACL may be reduced by a buffer to account for sources of management uncertainty. The ACL minus the management uncertainty buffer equals the ACT as displayed in the bluefish flowchart (Figure 20). The Monitoring Committee annually identifies and reviews the relevant sources of management uncertainty to recommend ACTs for the commercial and recreational fishing sectors as part of the bluefish specification process. The status quo option (alternative 6a) would maintain the bluefish flowchart as displayed in Figure 20, which demonstrates that any uncertainty buffer applied to the fishery-level ACL applies to both sector specific ACTs equally. Alternative 6b would provide greater flexibility by establishing ACLs and ACTs for each sector as displayed in the bluefish flow chart in Figure 21. Specifically, the proposed flowchart allows for management uncertainty to be

accounted for within each sector. This targeted approach would allow for the identification of sources of management uncertainty that are specific to one sector and are not present in the other.

Table 24: Proposed management uncertainty alternatives.

Alternatives	Management Uncertainty Alternatives
6a	No Action/Status Quo
6b	Post-Sector Split

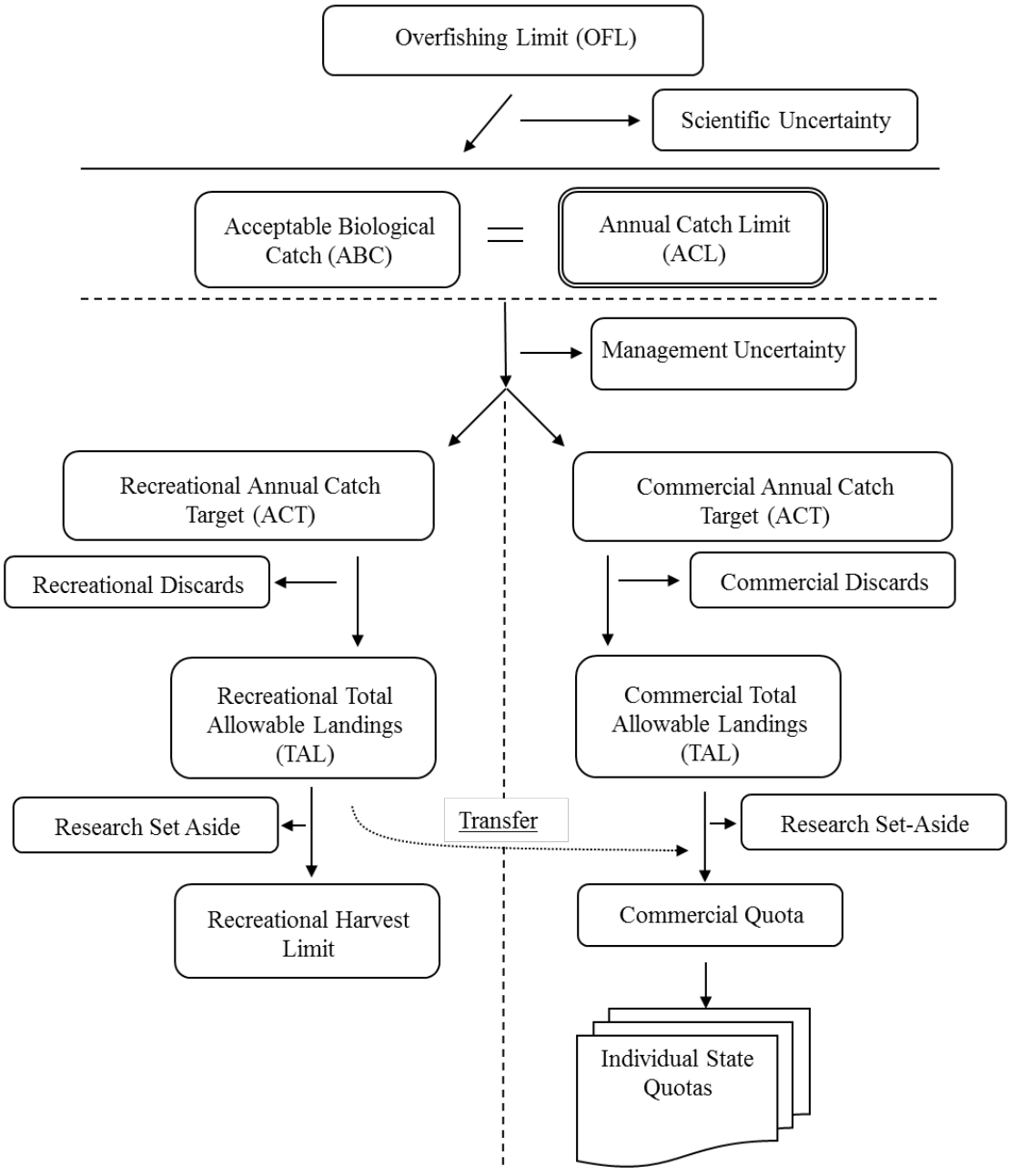


Figure 20: Current bluefish flow chart representing a reduction for management uncertainty prior to the sector split.

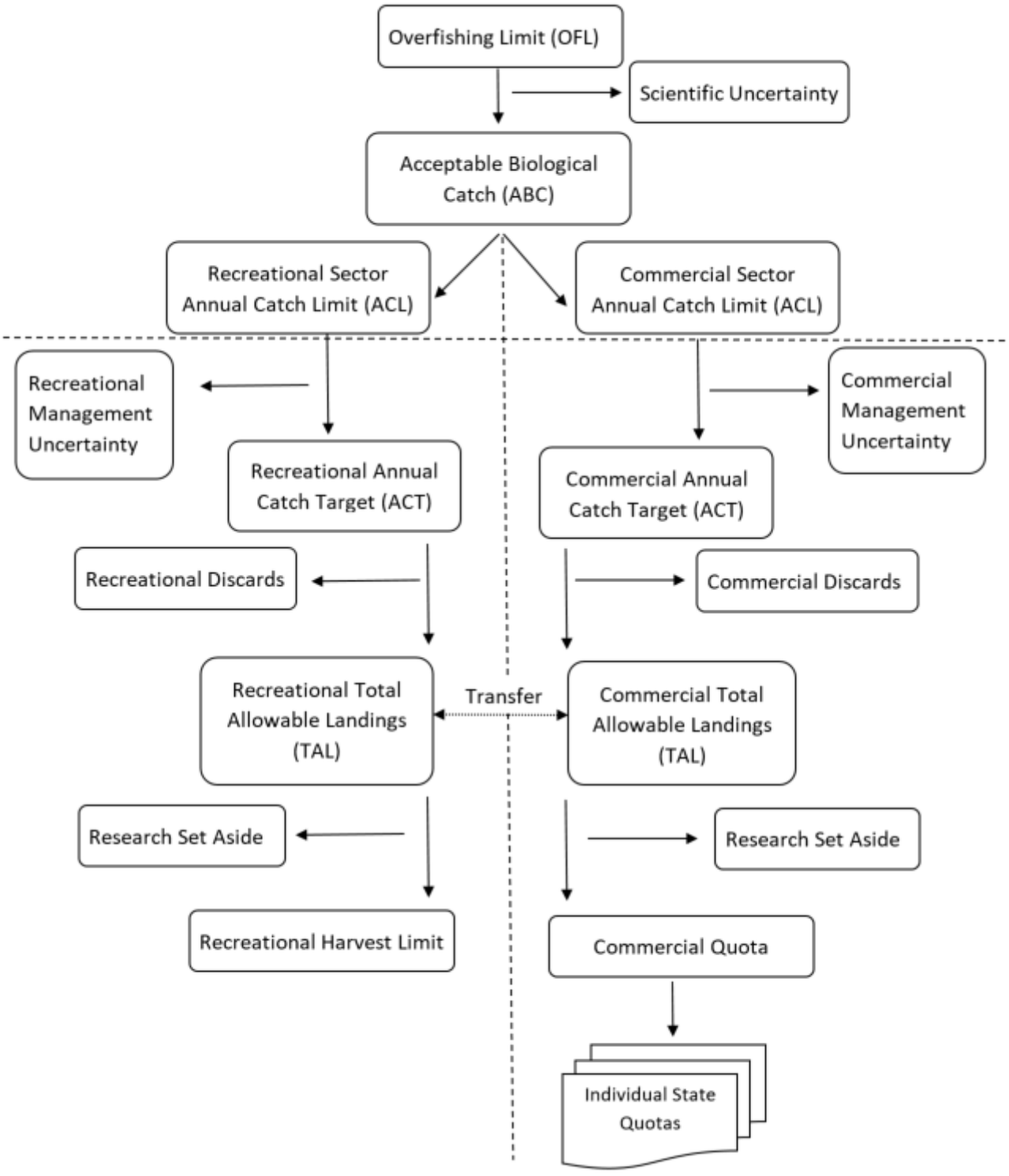


Figure 21: Proposed bluefish flow chart including sector specific management uncertainty.

9.2 Impacts of Management Uncertainty Alternatives

Identifying sources of management uncertainty and applying a buffer to reduce the probability of exceeding an ACL is a helpful tool in the management toolkit. However, the status quo alternative (6a) is lacking in its inability to specifically target sources of uncertainty that are present in one sector and not the other. In the current FMP, the management uncertainty buffer is applied to the fishery-level ACL prior to the sector split and as such has the unintended consequence of reducing both sector's ACLs regardless of the source of management uncertainty. Alternative 6b allows for a more targeted approach, where management uncertainty can be addressed by reducing one sector's ACL to the ACT while leaving the other sector unaffected.

The following example is used for demonstrative purposes only. Under alternative 6a, if the Council and Board are concerned about the lack of data on commercial discards and believe this to be a source of management uncertainty, the fishery-level ACL may be reduced by an agreed upon buffer. According to the flowchart in Figure 20, this reduction trickles down to both the commercial and recreational sectors' ACTs. This negatively impacts the recreational sector's catch and landings limits despite the fact that the source of the management uncertainty was the commercial sector. To avoid these cascading effects, the Council and Board could decide to not implement management uncertainty despite the associated greater potential risk of exceeding the ABC. Using this same example under alternative 6b, the Council and Board has the ability to reduce the commercial sector's ACT through the application of a management uncertainty buffer to the commercial sector ACL. This would leave the recreational sector's ACL unaffected and would not negatively impact the recreational sector's catch or landings limits.

Without the ability to apply sector specific management uncertainty buffers, Council and Board members are faced with the difficult decision of applying management uncertainty to both sectors indiscriminately, or not applying management uncertainty at all and risking potential overages in the fishery-level ACL or ABC.

Ultimately, alternative 6b might have neutral to low positive impacts for resource user groups. If management uncertainty disproportionately affects one sector over another, keeping the process in its current order could continue to frustrate and constrain some stakeholders who might otherwise benefit from determining uncertainties after dividing out sector catch targets. Furthermore, alternative 6b is expected to have minimal to no economic impacts on the commercial and recreational bluefish sectors.

The adoption of alternative 6b would require adjustments to the AMs as currently written. The evaluation of catch overages would transition from the fishery-level ACL to sector specific ACLs. The adoption of sector specific ACLs also has implications for the transfer process. For the purpose of maintaining accurate accounting and accountability of the ACL, both sector's ACLs would be adjusted to reflect the transfer at the landings limit level. If alternative 6b is selected by the Council and Board, the AM regulations would be updated through the federal rule making process for this amendment.

10.0 *DE MINIMIS* PROVISIONS ALTERNATIVES AND IMPACTS

Under the Commission's current FMP, states which land less than 0.1% of the coastwide commercial landings in the year prior are exempt from fishery independent monitoring

requirements for the following year. However, the federal plan does not require states to submit fishery independent monitoring reports, and as such has no *de minimis* provision.

10.1 *De Minimis* Provision Alternatives

The *de minimis* alternative set is presented in Table 25. Under the no action/status quo alternative 7a, *de minimis* status would remain excluded from the Federal Bluefish Amendment and maintain the status quo *de minimis* provision in the Commission Amendment.

Alternatives 7b, 7c, 7d, and 7e all expand upon the Commission's current *de minimis* provision, and the existing exemption of the requirement to conduct fishery independent monitoring remains. A state's three-year average of combined recreational and commercial landings compared against coastwide landings for the same period with a 1% threshold would be used to determine status for alternatives 7b, 7c, 7d, and 7e. The key distinction between the four alternatives is the different recreational management measures that *de minimis* states may adopt. Under all alternatives a *de minimis* state has the option to implement the coastwide measures if the state is only requesting *de minimis* status for the purposes of the fishery independent monitoring exemption.

Under alternative 7b, a *de minimis* determination would exempt the state from recreational measures. Since *de minimis* states would be exempt from coastwide recreational measures in state waters, there is potential for recreational effort to shift to *de minimis* states and for landings to become substantial before adequate action can be taken. To mitigate this, *de minimis* states are encouraged to implement recreational bag limits which would deter shifts in effort to their state.

Under alternative 7c, a *de minimis* determination would exempt the state from the coastwide measures. However, a *de minimis* state would still be required to implement recreational management measures of its choosing, which would deter shifts in effort from other states. *De minimis* states would be required to design measures that maintain harvest at levels below the 1% coastwide harvest threshold.

Under alternative 7d, a *de minimis* determination would allow a state to maintain the measures that were in place when the state first requested and qualified for *de minimis* status. The intent of this alternative would be to maintain low levels of harvest with consistent regulations. Please note that the base year of reference would be measures implemented in 2019, which was prior to the most recent change in coastwide measures. For example, Georgia has requested and qualified for *de minimis* status for the years 2019-2021. Upon implementation of this Amendment in 2022, Georgia would be allowed to adopt recreational measures consistent with those in place during the 2019 fishing year, assuming Georgia maintains its *de minimis* status for the 2022 fishing year. North Carolina on the other hand, has not qualified for *de minimis* status for any of the years 2019-2021. If North Carolina requested and qualified for *de minimis* status in 2022, North Carolina would be able to implement recreational measures consistent with what were in place for 2021.

Under alternative 7e, a *de minimis* determination would allow a state to maintain a set of minimum default recreational measures. At the October 2020 meeting, the Board and Council agreed that the fixed set of minimum default measures would consist of a bag limit of 3 fish for anglers fishing from shore or private vessels and 5 fish for anglers fishing on a for-hire trip, no minimum size, and an open season all year. These measures are consistent with the coastwide measures that were implemented in 2020.

Table 25 Proposed *de minimis* provision alternatives.

Alternatives	*De Minimis* Alternatives
7a	No Action/Status Quo
7b	Recreational *De Minimis* – no management measures
7c	Recreational *De Minimis* – state-selected management measures
7d	Recreational *De Minimis* – rollover management measures
7e	Recreational *De Minimis* – 2020 management measures

10.2 Impacts of *De Minimis* Provision Alternatives

Alternative 7a is anticipated to have neutral social impacts to the majority of stakeholders to the bluefish resource across user groups and sectors. Taking no action on the *de minimis* provision is expected to have low negative social impacts to recreational anglers that fish within state waters of *de minimis* states. These anglers would be subject to the coastwide recreational measures, which as of winter 2021 consist of a 3-fish bag limit for private anglers and a 5-fish bag limit for for-hire party and charter vessels. During the scoping process, the Georgia Department of Natural Resources provided a written request to alter the *de minimis* provision to allow for an exemption of restrictive recreational measures. GA, along with SC and ME have historically qualified for *de minimis* status. In the short term, alternatives 7b, 7c, and 7d would likely provide more liberalized recreational measures for anglers operating within these states' waters as well as any states that meet the requirements of *de minimis* status in the future.

Alternatives 7b, 7c, 7d and 7e complicate coastwide management of bluefish from an enforcement perspective. Anglers will need to be cognizant of the differing regulations between state and federal waters, as well as differing regulations when crossing state lines from a non *de minimis* state to a *de minimis* state. However, these concerns are already at play when states implement recreational measures within state lines under the Commission's conservation equivalency policy that differ from the coastwide measures. Alternatives 7b, 7c, and 7d would allow for a greater variety of state measures compared to alternative 7e, which would maintain just one default set of *de minimis* measures.

From a catch accounting perspective, the proposed *de minimis* provision in alternatives 7b, 7c, and 7d would reduce a state's accountability for its recreational harvest in the short term. Currently, the plan ensures that all states are held accountable by annually evaluating the need to adjust recreational measures to insure coastwide recreational catch does not exceed the RHL. A state that meets the *de minimis* criteria would not be held accountable in the same way, which raises questions about fairness and equity across state user groups. However, if a *de minimis* states' recreational landings increase significantly due to an unforeseen increase in angler effort, the state may exceed the 1% coastwide landings threshold and no longer be afforded *de minimis* status in the coming year. As such, that state will be held accountable and be required to implement recreational measures through the standard specifications process. Thus, *de minimis* states are incentivized under each of the proposed alternatives to implement measures that would prevent large increases in recreational landings. By comparison to incentivizing restrictive measures, alternative 7e requires more restrictive measures, which has a greater likelihood of constraining *de minimis* states to low levels of catch, but restricts flexibility.

Ultimately, the *de minimis* alternatives 7b, 7c, and 7d would result in minor economic benefits for states that meet the *de minimis* criteria. Currently, there is an opportunity cost associated with abiding to the coastwide bluefish recreational regulations, such that relieving a state from adhering to these regulations would give a slight economic advantage to these low-landing states. Alternatives 7b, 7c, and 7d also have the potential to relieve *de minimis* states of the administrative burden of implementing new and changing recreational measures.

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12.0 APPENDIX A SUPPLEMENTAL SOCIAL IMPACTS

Social Impacts

National Standard 8 (NS8) requires the Council to consider the importance of fishery resources to affected communities and provide those communities with continuing access to fishery resources, but it does not allow the Council to compromise the conservation objectives of the management measures. Thus, continued overall access to fishery resources is a consideration, but not a guarantee that fishermen would be able to use a particular gear type, harvest a particular species of fish, fish in a particular area, or fish during a certain time of the year.

A fundamental difficulty exists in forecasting social change relative to management alternatives, since communities or other societal groups are constantly evolving in response to external factors (e.g., market conditions, technology, alternate uses of waterfront, tourism). Certainly, fishery regulations influence the direction and magnitude of social change, but attribution is difficult with the tools and data available.

While the focus here is on the social impacts of the alternatives, external factors may also influence change, both positive and negative, in the affected communities. External factors may also lead to unanticipated consequences of a regulation, due to cumulative impacts. These factors contribute to a community's ability to adapt to new regulations. When examining potential social impacts of management measures, it is important to consider impacts on the following: the fishing fleet (vessels grouped by fishery, primary gear type, and/or size); vessel owners and employees (captains and crew); bluefish dealers and processors; final users of bluefish; community cooperatives; fishing industry associations; cultural components of the community; and fishing families. While some management measures may have a short-term negative impact on some communities, these should be weighed against potential long-term benefits to all communities which can be derived from a sustainable bluefish fishery.

Social Impact Factors

The social impact factors outlined below can be used to describe the Atlantic bluefish fishery, its sociocultural and community context, and its participants. These factors or variables are considered relative to the management alternatives and used as a basis for comparison between alternatives. Use of these kinds of factors in social impact assessment is based on NOAA Fisheries guidance (NMFS 2007) and other texts (e.g., Burdge 1998). Longitudinal data describing these social factors region-wide and in comparable terms is limited. Qualitative discussion of the potential changes to the factors characterizes the likely direction and magnitude of the impacts.

The social impact factors fit into five categories:

1. *Size and Demographic Characteristics* of the fishery-related workforce residing in the area; these determine demographic, income, and employment effects in relation to the workforce as a whole, by community and region.
2. The *Attitudes, Beliefs, and Values* of fishermen, fishery-related workers, other stakeholders and their communities; these are central to understanding the behavior of fishermen on the fishing grounds and in their communities.
3. The *Social Structure and Organization*; that is, changes in the fishery's ability to provide necessary social support and services to families and communities, as well as effects on the community's social structure, politics, etc.

4. The *Non-Economic Social Aspects* of the fishery; these include lifestyle, health, and safety issues, and the non-consumptive and recreational uses of living marine resources and their habitats.
5. The *Historical Dependence on and Participation in* the fishery by fishermen and communities, reflected in the structure of fishing practices, income distribution, and rights (NMFS 2007).

Community Fishing Engagement and Social Vulnerability Indicators

In addition to traditional economic indicators such as landings and revenue, fishing communities can also be understood in terms of overall engagement in the commercial and recreational fishery and other social and economic community conditions. NOAA Fisheries social scientists produce indicators of commercial and recreational fishing engagement, reliance, and other community characteristics for virtually all fishing communities throughout the United States, referred to as the Social Indicators of Fishing Community Vulnerability and Resilience (Colburn and Jepson 2012). The Social Indicators are composite indices of factors that comprise community-level latent constructs, such as commercial fishing engagement or social vulnerability. The strength of these indicators is that they provide greater depth and contextualization to our understanding of fishing communities than the more commonly utilized landings and revenue statistics. The Social Indicators provide a more comprehensive view of fishing communities by including social and economic conditions that can influence the viability of commercial and recreational fishing activities, such as gentrification pressure, poverty, and housing characteristics, among other factors.

2009-2018 Recreational Engagement and Reliance

The Recreational Engagement Indicator is a numerical index that reflects the level of a community's engagement in recreational fisheries relative to other communities in the Northeast and Mid-Atlantic. This index was generated using a principal components factor analysis (PCFA) of variables related to recreational fishing activity from the NOAA Fisheries MRIP datasets. PCFA is a common statistical technique used to identify factors that are related, yet linearly independent, and likely represent a latent or unobservable concept when considered together, such as factors that contribute to the level of a community's social vulnerability or engagement in commercial fishing. The variables that were identified to best reflect community engagement in recreational fisheries included; 1) the total number of shore trips per community for each year; 2) the total number of charter trips per community for each year; and 3) the total number of private recreational trips per community for each year. The Recreational Reliance Indicator is calculated by dividing these three variables by the total community population obtained from the U.S. Census Bureau's American Community Survey (ACS). It should be noted that a high engagement score does not necessarily mean that a community or its fishery participants are solely dependent upon recreational fishing activities. There may be other fishing or economic activities that may sustain the livelihoods of individuals or entities within these communities that have relied on recreational fishing historically.

Figure 2 displays the factor scores for the Recreational Engagement Indicator for the fifteen communities that have the highest average recreational engagement between 2009 and 2018. The index factor scores are commonly categorized from low to high based on the number of standard deviations from the mean, which is set at zero. Categories rank from 0.00 or below as "low", 0.00 – 0.49 as "medium," and 0.50 – 0.99 as "medium-high," and 1 standard deviation or above as

"high." All of the ports displayed in Figure 1 have "high" recreational engagement. However, there has also been substantial year-to-year variability in recreational engagement for many of these ports. For example, communities in Florida with high average engagement have seen large increases in engagement in recent years relative to the earlier part of the time series, whereas communities in New York and New Jersey have experienced wide fluctuations over time in their extent of recreational fishing engagement.

Figure 3 shows the factor scores for the Recreational Reliance Indicator for the fifteen communities that have the highest average recreational reliance between 2009 and 2018. A comparison of Figure 2 and Figure 3 reveals that some highly engaged communities may not be as highly reliant on recreational fisheries due to the size of those communities and the accompanying opportunities for other social and economic activities. Among the five most highly reliant communities on recreational fisheries over the period of 2009 to 2018 were Barnegat Light, NJ, Topsail Beach, NC, Orient, NY, Hatteras (and all other communities throughout the Outer Banks), NC, and Montauk, NY. In recent years, Nags Head, NC, and Melbourne Beach, FL, have increased considerably in their reliance on recreational fisheries.

Community Social Vulnerability Indicators

The Community Social Vulnerability Indicators (CSVI) include indices of labor force structure, housing characteristics, poverty, population composition, and personal disruption. The labor force structure index measures the makeup of the labor force and is reversed scored so that a higher factor score represents fewer employment opportunities and greater labor force vulnerability. The housing characteristics index measures vulnerability related to infrastructure and home and rental values. It is also reversed score so that a higher score represents more vulnerable housing infrastructure. The poverty index captures multiple different factors that contribute to an overall level of poverty in a given area. A higher poverty index score would indicate a greater level of vulnerability due to a higher proportion of residents receiving public assistance and below federal poverty limits. The population composition index measures the presence of vulnerable populations (i.e., children, racial/ethnic minorities, and/or single-parent, female-headed households) and a higher score would indicate that a community's population is composed of more vulnerable individuals. Finally, the personal disruption index considers variables that affect individual-level vulnerability primarily and include factors such as low individual-level educational attainment or unemployment. Higher scores of personal disruption likely indicate greater levels of individual vulnerability within a community, which can in turn impact the overall level of community social vulnerability.

Gentrification Pressure Indicators include housing disruption, urban sprawl, and retiree migration. The Housing Disruption Index combines factors that correspond to unstable or shifting housing markets in which home values and rental prices may cause residents to become displaced. The Urban Sprawl Index indicates the extent of population increase due to migration from urban centers to suburban and rural areas, which often results in cost of living increases and gentrification in the destination communities. The Retiree Migration Index characterizes communities by the concentration of retirees or individuals above retirement age whose presence often raises the home values and rental rates, as well as increase the need for health care and other services. These

components of gentrification pressure influence the degree to which the current residents, communities, and local economies can remain in place, generally, and the extent to which those in the fishing industry in these communities are able to withstand or overcome changes to fisheries conditions and management, specifically. As places go through the process of gentrification, housing becomes less available and/or unaffordable for the existing population and the historically significant local fishing businesses and industries that had once thrived become displaced or replaced by new and emerging industries, such as tourism, finance, real estate, and service.

Data used to develop these indices come from multiple secondary data sources, but primarily the U.S. Census ACS at the place level (Census Designated Place and Minor Civil Division). More information about the data sources, methods, and other background details can be found online at https://www.st.nmfs.noaa.gov/humandimensions/social-indicators/. Table 26A displays the CSVI categorical scores for all of the highly engaged and/or reliant communities on recreational fishing activities. Table 27A displays CSVI categorical scores for all highly engaged communities in commercial bluefish fishery activities.

Socio-Economic Survey of Hired Captains and Crew in New England and Mid-Atlantic Commercial Fisheries (Crew Survey)

The Socio-Economic Survey of Hired Captains and Crew in New England and Mid-Atlantic Commercial Fisheries (hereafter referred to as the Crew Survey) is an ongoing effort conducted by the Social Sciences Branch of the National Oceanic and Atmospheric Administration Fisheries Northeast Fisheries Science Center intended to gather general information about the characteristics and experiences of commercial fishing crew members (including hired captains) because little is known about this critical segment of the commercial fishing industry. Information collected by the survey include demographic information, wage calculations systems, well-being, fishing practices, job satisfaction, job opportunities, and attitudes towards fisheries management, among other subjects. There have been two waves of Crew Survey data collection thus far – Wave 1 in 2012-13 and Wave 2 in 2018-19.

Table 26A: 2018 Community Social Vulnerability Indicator Categorical Scores for Recreational Fishing Communities.

Community	Poverty	Labor Force	Housing Characteristics	Population Composition	Personal Disruption	Housing Disruption	Retiree Migration	Urban Sprawl
Slaughter Beach, DE	Low	High	Low	Low	Low	High	High	Low
Cape Canaveral, FL	Low	Med-High	Med-High	Low	Low	Med-High	Med-High	Low
Jacksonville, FL	Medium	Low	Medium	Medium	Medium	Low	Low	Low
Jacksonville Beach, FL	Low	Low	Low	Low	Low	High	Low	Low
Melbourne Beach, FL	Low	Medium	Low	Low	Low	Medium	Med-High	Low
Church Creek, MD	Low	Low	Medium	Low	Medium	Medium	Low	Low
Nanticoke, MD	Low	Med-High	Low	Low	Low	Low	High	Low
Ocean City, MD	Low	Medium	Med-High	Low	Low	Med-High	Med-High	Low
Hatteras/Outer Banks, NC	Med-High	Low	Medium	Low	Med-High	Med-High	Medium	Low
Hobucken, NC	High	Low	Low	Low	Medium	Low	Med-High	Low
Morehead City, NC	Medium	Medium	Med-High	Low	Medium	Medium	Medium	Low
Nags Head, NC	Low	Low	Low	Low	Low	High	Low	Low
Ocracoke, NC	Med-High	Med-High	Low	Medium	High	Low	Med-High	Low
Topsail Beach, NC	Medium	Med-High	Low	Low	Low	Low	Med-High	Low
Atlantic Highlands, NJ	Low	Low	Low	Low	Low	Medium	Low	Medium
Barnegat Light, NJ	Low	High	Low	Low	Low	High	High	Med-High
Cape May, NJ	Low	Med-High	Low	Low	Low	High	High	Medium
Babylon, NY	Low	Low	Low	Low	Low	Med-High	Low	High
Montauk, NY	Low	Medium	Low	Low	Low	High	Med-High	Med-High
Orient, NY	Low	High	Low	Low	Low	High	High	Med-High
Narragansett/Point Judith, RI	Low	Medium	Low	Low	Low	Med-High	Medium	Low
Pawleys Island, SC	Low	High	Low	Low	Low	Medium	High	Low
Virginia Beach, VA	Low	Low	Low	Medium	Low	Medium	Low	Low
Wachapreague, VA	Low	Med-High	Medium	Low	Low	Low	Med-High	Low

Table 27A: 2018 Community Social Vulnerability Indicator Categorical Scores for Commercial Bluefish Fishing Communities.

Community	Poverty	Labor Force	Housing Characteristics	Population Composition	Personal Disruption	Housing Disruption	Retiree Migration	Urban Sprawl
Chatham, MA	Low	High	Low	Low	Low	High	High	Medium
Gloucester, MA	Low	Low	Low	Low	Low	Medium	Low	Medium
New Bedford, MA	High	Low	Medium	Med-High	Med-High	Medium	Low	Med-High
Provincetown, MA	Low	Medium	Low	Low	Low	High	Med-High	Med-High
Hatteras, NC	Low	High	Low	Low	Low	Low	High	Low
Wanchese, NC	Low	Low	Med-High	Medium	Low	Medium	Low	Low
Barnegat Light, NJ	Low	High	Low	Low	Low	High	High	Med-High
Belford, NJ	Low	Low	Low	Low	Low	High	Low	Medium
Cape May, NJ	Low	Med-High	Low	Low	Low	High	High	Medium
Point Pleasant Beach, NJ	Low	Medium	Low	Low	Low	High	Medium	Med-High
Amagansett, NY	Low	Med-High	Low	Low	Low	High	Med-High	High
Greenport, NY	Low	Medium	Low	Medium	Medium	High	Medium	Med-High
Hampton Bays/Shinnecock, NY	Low	Low	Low	Medium	Low	High	Medium	Med-High
Montauk, NY	Low	Medium	Low	Low	Low	High	Med-High	Med-High
Narragansett/Pt Judith, RI	Low	Medium	Low	Low	Low	Med-High	Medium	Low

13.0 APPENDIX B PRICE MODEL

To assess the economic impacts of the various rebuilding alternatives as well as estimation of revenues under various landing scenarios, ex-vessel bluefish prices require estimation. In lieu of well-developed market supply and demand models, an inverse-demand based price model is used to estimate ex-vessel bluefish prices. Though price and quantity demanded are jointly determined such that Gauss Markov assumptions of exogeneity are violated, here, we assume harvest is weakly exogenous to ex-vessel price given the quota allocations and seasonal constraints which cause fishermen to maximize catch in order to maximize profits (Gordon 2020). This specification implies that the decision to fish is independent of ex-vessel prices. This assumption, as well as ex-vessel price models, are not uncommon in fishery economics literature. [15]

The Generalized Least Squares bluefish price model is given as:

$$(\log)\text{Ex-vessel Price}_t = \alpha + \beta_1 (\log)\text{Landings}_t + \text{AR}_t \qquad \text{(Equation A)}$$

where the dependent variable is the natural logarithm of average annual ex-vessel bluefish price [16] ($/lb.) and the dependent variable is the natural log of total annual bluefish landings, t is time (i.e., years) and AR is an autoregressive error term. The dependent and independent variables are logged because the relationship between ex-vessel prices and landings is not expected to be strictly linear such that the slope of the regression is not assumed to be constant. The logged GLS model was implemented in place of a logged OLS model as the error term is suggested to be serially correlated over time with a Durbin-Watson d statistic of 0.72. After the implementation of the Prais–Winsten GLS estimator, the Durbin-Watson statistic was transformed to 1.67. It should be noted that additional models were taken into consideration after autocorrelation was detected, including a Cochrane-Orcutt AR(1) regression, linear autoregressive integrated moving-average (ARIMA) specified models with AR(2-5), an OLS regression with the inclusion of a lagged ex-vessel price, and a separate OLS regression with a lagged landings variable. Given the dependence of the lagged OLS regression on the previous year's price, the lack of significance on the AR(n) coefficients when the lag is greater than one [17], along with the consideration of RMSE's, the Prais-Winsten GLS with an AR(1) error term was chosen. The Prais-Winsten was selected over the Cochrane-Orcutt given a lower RMSE and a Durbin-Watson statistic closer to 2. The Prais-Winsten GLS model parameters and results are shown in Table 29B.

[15] Gordon (2020), Bloznelis (2018) and Tai (2017) offer thorough reviews of various price models and their respective methods.
[16] Prices were adjusted to 2020 constant dollars using the Annual, Seasonally Adjusted, Gross Domestic Implicit Price Deflator (2012=100) https://fred.stlouisfed.org/series/GDPDEF.
[17] $\alpha = 0.01$

Table 28B: Prais-Winsten Generalized Least Squares (GLS) logged ex-vessel bluefish price model results.

Variable	Coefficient	Standard Error	t	P>t	95% Confidence Interval	
Ln Landings	-0.543	0.0951	-5.71	0	-0.74	-0.35
Constant	7.753	1.435	5.40	0	4.78	10.73
ρ	0.688		**Durbin-Watson Statistic (original)**			0.72
R-squared	0.68		**Durbin-Watson Statistic (transformed)**			1.67
Number of Obs.	24		**Root Mean Square Error**			0.08

Both price and landings data were retrieved from the Commercial Fisheries Database (CFDERS) from 1996 to 2019. About 68% of the variability in logged average ex-vessel bluefish prices are explained by logged total annual landings. Modeling the inverse relationship between prices and landings aids in more precisely estimating revenues given various expected landing quantities. The logged price variables are retransformed using Duan's smearing method to avoid inciting heteroskedastic errors. Average realized ex-vessel prices and estimated prices by year are shown in Figure 24B. Average annual predicted ex-vessel prices range from $0.55 to $0.98 per lb with an average price of $0.66/lb. Average realized prices range from $0.46 to $1.03/lb and average $0.66/lb across the time series.

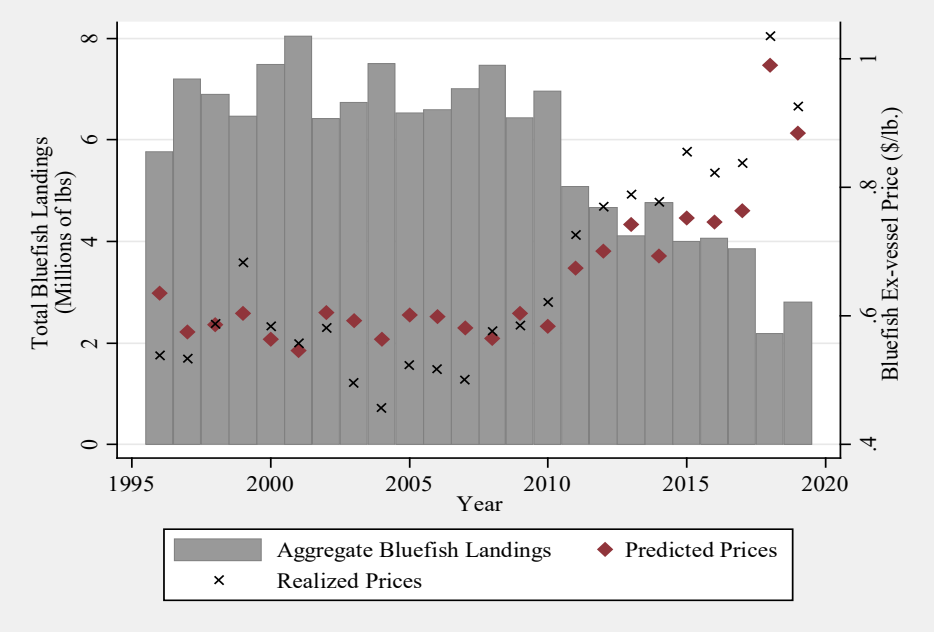

Figure 22B: Realized and predicted ex-vessel bluefish prices and realized commercial bluefish landings by year (1996-2019).

14.0 APPENDIX C SUPPLEMENTAL MINIMUM DEFAULT TABLES

Table 29C: Bluefish state-by-state allocation percentage point shift along the U.S. Atlantic coast using different proposed time series and a minimum default allocation of 0.10% while incorporating a phase-in approach.

0.1% Minimum Default Allocation		Min. Def. Status quo			5 year (2014-2018) - 3a-2			10 year (2009-2018) - 3a-3			1/2 '81-'89 1/2 '09-'18 - 3a-4		
State	Current Allocations	4-year	5-year	7-year	4-year	5-year	7-year	4-year	5-year	7-year	4-year	5-year	7-year
ME	0.67%	0.02%	0.02%	0.01%	-0.14%	-0.11%	-0.08%	-0.14%	-0.11%	-0.08%	-0.02%	-0.02%	-0.01%
NH	0.41%	0.02%	0.02%	0.01%	-0.07%	-0.06%	-0.04%	-0.05%	-0.04%	-0.03%	0.00%	0.00%	0.00%
MA	6.72%	0.00%	0.00%	0.00%	0.97%	0.77%	0.55%	0.85%	0.68%	0.49%	0.23%	0.19%	0.13%
RI	6.81%	0.00%	0.00%	0.00%	1.23%	0.99%	0.70%	0.70%	0.56%	0.40%	0.19%	0.15%	0.11%
CT	1.27%	0.02%	0.02%	0.01%	0.00%	0.00%	0.00%	-0.05%	-0.04%	-0.03%	0.00%	0.00%	0.00%
NY	10.39%	-0.01%	-0.01%	-0.01%	2.43%	1.95%	1.39%	2.34%	1.87%	1.34%	0.63%	0.51%	0.36%
NJ	14.82%	-0.03%	-0.02%	-0.02%	-0.91%	-0.73%	-0.52%	-0.24%	-0.19%	-0.14%	-0.09%	-0.07%	-0.05%
DE	1.88%	0.02%	0.01%	0.01%	-0.30%	-0.24%	-0.17%	-0.35%	-0.28%	-0.20%	-0.08%	-0.07%	-0.05%
MD	3.00%	0.01%	0.01%	0.01%	-0.36%	-0.29%	-0.20%	-0.27%	-0.22%	-0.15%	-0.06%	-0.05%	-0.04%
VA	11.88%	-0.02%	-0.01%	-0.01%	-1.81%	-1.45%	-1.03%	-1.50%	-1.20%	-0.86%	-0.41%	-0.33%	-0.24%
NC	32.06%	-0.09%	-0.07%	-0.05%	-0.09%	-0.07%	-0.05%	-0.01%	-0.01%	0.00%	-0.07%	-0.06%	-0.04%
SC	0.04%	0.02%	0.02%	0.01%	0.02%	0.01%	0.01%	0.02%	0.01%	0.01%	0.02%	0.02%	0.01%
GA	0.01%	0.02%	0.02%	0.01%	0.02%	0.02%	0.01%	0.02%	0.02%	0.01%	0.02%	0.02%	0.01%
FL	10.06%	-0.01%	-0.01%	-0.01%	-0.99%	-0.80%	-0.57%	-1.32%	-1.06%	-0.75%	-0.37%	-0.30%	-0.21%

Table 30C: Bluefish state-by-state allocation percentage point shift along the U.S. Atlantic coast using different proposed time series and a minimum default allocation of 0.25% while incorporating a phase-in approach.

0.25% Minimum Default Allocation		Min. Def. Status quo			5 year (2014-2018) - 3a-2			10 year (2009-2018) - 3a-3			1/2 '81-'89 1/2 '09-'18 - 3a-4		
State	Current Allocations	4-year	5-year	7-year	4-year	5-year	7-year	4-year	5-year	7-year	4-year	5-year	7-year
ME	0.67%	0.06%	0.05%	0.03%	-0.10%	-0.08%	-0.06%	-0.10%	-0.08%	-0.06%	0.01%	0.01%	0.01%
NH	0.41%	0.06%	0.05%	0.03%	-0.03%	-0.03%	-0.02%	-0.01%	-0.01%	-0.01%	0.04%	0.03%	0.02%
MA	6.72%	0.00%	0.00%	0.00%	0.95%	0.76%	0.54%	0.83%	0.67%	0.48%	0.23%	0.18%	0.13%
RI	6.81%	0.00%	0.00%	0.00%	1.21%	0.97%	0.69%	0.69%	0.55%	0.39%	0.19%	0.15%	0.11%
CT	1.27%	0.05%	0.04%	0.03%	0.03%	0.02%	0.02%	-0.01%	-0.01%	-0.01%	0.03%	0.03%	0.02%
NY	10.39%	-0.03%	-0.02%	-0.02%	2.36%	1.89%	1.35%	2.27%	1.82%	1.30%	0.60%	0.48%	0.34%
NJ	14.82%	-0.07%	-0.05%	-0.04%	-0.93%	-0.75%	-0.53%	-0.28%	-0.22%	-0.16%	-0.13%	-0.10%	-0.07%
DE	1.88%	0.05%	0.04%	0.03%	-0.27%	-0.21%	-0.15%	-0.31%	-0.25%	-0.18%	-0.05%	-0.04%	-0.03%
MD	3.00%	0.04%	0.03%	0.02%	-0.33%	-0.26%	-0.19%	-0.24%	-0.19%	-0.14%	-0.04%	-0.03%	-0.02%
VA	11.88%	-0.04%	-0.03%	-0.02%	-1.79%	-1.43%	-1.02%	-1.50%	-1.20%	-0.86%	-0.43%	-0.34%	-0.25%
NC	32.06%	-0.22%	-0.17%	-0.12%	-0.22%	-0.17%	-0.12%	-0.14%	-0.11%	-0.08%	-0.20%	-0.16%	-0.12%
SC	0.04%	0.06%	0.05%	0.04%	0.05%	0.04%	0.03%	0.05%	0.04%	0.03%	0.06%	0.05%	0.03%
GA	0.01%	0.06%	0.05%	0.04%	0.06%	0.05%	0.03%	0.06%	0.05%	0.03%	0.06%	0.05%	0.04%
FL	10.06%	-0.03%	-0.02%	-0.01%	-0.99%	-0.79%	-0.57%	-1.31%	-1.05%	-0.75%	-0.38%	-0.30%	-0.22%

Table 31C: Bluefish state allocations above a trigger threshold for all commercial allocation time series and a minimum default allocation of 0.10%.

Allocation of additional quota beyond the trigger threshold with a Minimum Default Allocation of 0.10%.				
State	**Status quo (1981-1989)**	**5 year (2014-2018)**	**10 year (2009-2018)**	**1/2 '81-'89 1/2 '09-'18**
ME	0.10%	0.10%	0.10%	0.10%
NH	0.10%	0.10%	0.10%	0.10%
MA	7.50%	16.60%	18.88%	7.50%
RI	7.50%	16.60%	7.50%	7.50%
CT	3.00%	3.00%	3.00%	3.00%
NY	15.12%	16.60%	18.88%	17.03%
NJ	15.12%	16.60%	18.88%	17.03%
DE	3.00%	0.10%	0.10%	3.00%
MD	3.00%	3.00%	3.00%	3.00%
VA	15.12%	3.00%	7.50%	17.03%
NC	15.12%	16.60%	18.88%	17.03%
SC	0.10%	0.10%	0.10%	0.10%
GA	0.10%	0.10%	0.10%	0.10%
FL	15.12%	7.50%	3.00%	7.50%
Total	100%	100%	100%	100%

Table 32C: Bluefish state allocations above a trigger threshold for all commercial allocation time series and a minimum default allocation of 0.25%.

Allocation of additional quota beyond the trigger threshold with a Minimum Default Allocation of 0.25%.				
State	**Status quo (1981-1989)**	**5 year (2014-2018)**	**10 year (2009-2018)**	**1/2 '81-'89 1/2 '09-'18**
ME	0.10%	0.10%	0.10%	0.10%
NH	0.10%	0.10%	0.10%	0.10%
MA	7.50%	16.60%	18.88%	7.50%
RI	7.50%	16.60%	7.50%	7.50%
CT	3.00%	3.00%	3.00%	3.00%
NY	17.03%	16.60%	18.88%	17.03%
NJ	17.03%	16.60%	18.88%	17.03%
DE	3.00%	0.10%	0.10%	3.00%
MD	3.00%	3.00%	3.00%	3.00%
VA	17.03%	3.00%	7.50%	17.03%
NC	17.03%	16.60%	18.88%	17.03%
SC	0.10%	0.10%	0.10%	0.10%
GA	0.10%	0.10%	0.10%	0.10%
FL	7.50%	7.50%	3.00%	7.50%
Total	100%	100%	100%	100%

15.0 APPENDIX D ACRONYMS AND ABBREVIATIONS

ABC	Acceptable Biological Catch
ACL	Annual Catch Limit
ACS	American Community Survey
ACT	Annual Catch Target
AM	Accountability Measure
Board	The Commission's Bluefish Management Board
Commission	Atlantic States Marine Fisheries Commission
Council	Mid-Atlantic Fishery Management Council
CSVI	Community Social Vulnerability Indicators
F	Fishing Mortality Rate
FMAT	Fishery Management Action Team
FMP	Fishery Management Plan
GARFO	Greater Atlantic Regional Fisheries Office
MC	Monitoring Committee
MRIP	Marine Recreational Information Program
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NOAA	National Oceanic and Atmospheric Administration
NEFSC	Northeast Fisheries Science Center
NMFS	National Marine Fisheries Service
PCFA	Principal Components Factor Analysis
RHL	Recreational Harvest Limit
SSB	Spawning Stock Biomass
SSC	Scientific and Statistical Committee
TAL	Total Allowable Landings

Atlantic States Marine Fisheries Commission & Mid-Atlantic Fishery Management Council
Joint Summer Flounder, Scup, and Black Sea Bass Advisory Panel
Meeting Summary

April 27, 2021

ASMFC Advisory Panel members in attendance:

- ***Frank Blount** – RI (for hire)
- **Rusty Hudson** – FL (commercial)
- **TJ Karbowski** – CT (for hire)
- **John LaFountain** – RI (commercial)
- **Robert Lorenz** – NC (recreational)

MAFMC Advisory Panel members in attendance:

- ***Frank Blount** – RI (for hire)
- **Captain Victor Hartley III** – NJ (for hire)
- **Michael Pirri** – CT (for hire)

Additional attendees:

- **Chris Batsavage** (MAFMC & ASMFC, NC)
- **Emilie Franke** (ASMFC)
- **Stephen Pearson** (MAFMC)
- **Mike Waine** (American Sportfishing Association)

Staff: Dustin Colson Leaning (ASMFC Staff), **Matt Seeley** (MAFMC Staff)
* Indicates member of both Council and Commission APs

Meeting Summary

The Advisory Panels of the Atlantic States Marine Fisheries Commission (Commission) and the Mid-Atlantic Fishery Management Council (Council) met jointly via webinar on April 27, 2021 to review the Bluefish Allocation and Rebuilding Amendment Public Comment Summary and provide recommendations on the alternatives being considered in the amendment.

In February 2021, the Council and the Commission released the Bluefish Allocation and Rebuilding Amendment Public Hearing Document and Draft Amendment to consider: (1) revisions to the fishery management plan (FMP) goals and objectives; (2) modifying the current allocations between the commercial and recreational sectors; (3) modifying the current

commercial allocations to the states; (4) initiation of a rebuilding plan; (5) revisions to the quota transfer process (6) revisions to how the FMP accounts for management uncertainty; and (7) revisions to the *de minimis* provisions in the Commission's FMP. Commission and Council staff hosted 5 public hearings via webinar in March and April to gather public comment on the document. The Board and Council received written and in-person comments from 378 individuals and organizations during the public comment period.

Council and Commission Staff briefly presented on each of the alternative sets under consideration followed by an overview of the range of comments received by the Board and Council. Advisors provided comments of their own on which alternatives they supported from the documents. Advisor comments submitted by email are appended at the end of this summary.

FMP Goals and Objectives

- **John LaFountain:** The current objective 2 is to provide the highest availability of bluefish to U.S. fishermen while maintaining, within limits, traditional uses of bluefish. I feel this objective supports commercial fishing and harvest of bluefish. I'm scared that the proposed objectives are leaning toward managing the fish for abundance to more support the recreational fishery. I'm afraid the recreational advocates want the fish to be managed more like striped bass. If they had it their way all the bluefish would be kept in the ocean to be caught and released based on the comments I have heard at the public meetings. Also, is the proposed objective 1.1 saying in other words: allow the maximum harvest of bluefish while maintaining a sustainable stock biomass? I would like the language to include something about managing to allow the "maximum harvest" or "highest availability" to fisherman as the current objective 2 included.
- **TJ Karbowski:** You can change language as much as you want, but there needs to be something in here that is tied to ecosystem-based management. All the large fish disappeared in 2013 when the bunker left. Promote objective 1.5 to 1.1.
- **Capt. Victor Hartley:** I support separating the different user groups into their own sectors. This should happen in all fisheries. We need sector separation with the for-hire sector having its own allocation.

Sector Allocations

- **Capt. Victor Hartley:** I support 2a-3 and do not believe we need a phase-in.
- **John LaFountain:** 2a-5 considers the most amount of data. I originally preferred status quo; however, I think we should use as much data as possible and thus the longest time series. Also, why are we considering reallocating when we are initiating a rebuilding plan, how is this relevant?
- **TJ Karbowski:** I still support status quo even though it hurts me a little bit. I do not think we need to take money from any of the commercial guys. I also think we will be

throwing out the new Marine Recreational Information Program (MRIP) numbers in a few years. Keeping things status quo will make the whole process much easier.

- **Rusty Hudson:** In Florida, we have had the worst weather the past few years. You have my choices in my letter – Spanish and king mackerel, and bluefish are all farther offshore. We are hoping for sufficient allocation to allow the food producing community to continue operating.
- **Frank Blount:** I do not necessarily discount the form letter, but I like using catch data. Either 2a-2 or 2a-3. The support for those when summed almost matches the other alternatives. I am curious if this support for these alternatives is because catch data is being used or whether the public simply prefers the percentages.

Commercial Allocations to the States

- **Capt. Victor Hartley:** Stay with status quo and use a 0.25% minimum default allocation.
- **Robert Lorenz:** I am a recreational fishermen in North Carolina. The commercial catch is interesting because Hatteras-north has very large bluefish. South of Hatteras, the fish are much smaller. Sometimes the larger ones are available south but farther offshore. These fish are persistently cyclical. For that reason, I believe this fishery will recover on its own. Fishing may not be the biggest influence that causes this cyclical nature. Therefore, I am in favor of keeping things as simple and fair as possible. Use status quo and a 0.25% minimum default allocation. No trigger or phase-in and keep it as simple as you can.
- **John LaFountain:** How often will allocations be reviewed? *Staff responded: allocations will be reviewed at least within every 10 years according to the Council's new policy*. Therefore, go with 3a-2 using the most recent data.
- **Frank Blount:** Any of the alternatives other than status quo. I also support a 0.25% minimum default allocation. I am assuming transfers between states will still occur.
- **Rusty Hudson:** Since the pandemic, MRIP recalibration seems to be inflated. It takes so long to get these numbers with lag in reporting, do we have 2020 data yet? How reliable are these 2020 estimates and what will be incorporated into the 2021 stock assessment? *Staff responded: there was a 3–4-month period during the spring/summer of 2020 where intercepts were halted, and as they were phased back they were still limited. Frequency of intercepts also varied state by state. The 2021 assessment will only use data through 2019.*
- **Mike Waine (member of the public):** What was the terminal year of the 2019 operational assessment? *Staff responded: 2018.*

Rebuilding Plan

- **Capt. Victor Hartley:** We should go with the 7-year rebuilding plan. For Jersey, bluefish is a big part of our business. I do not want folks to experience a reduced bag limit.

- **TJ Karbowski:** Forage fish are a major issue here. Whatever math is being conducted, the MRIP numbers need to be thrown out. For 2019, in Connecticut from shore, over 2000 fish were harvested per day – this is not realistic.
- **John LaFountain:** Have the rebuilding plans already started? *Staff responded: After a rebuilding plan is selected it will be implemented starting in 2022.* I would support 4d to reduce the impact to the commercial quotas.
- **Robert Lorenz:** I support the p* approach. In southeast North Carolina, I hear reports that bluefish are biting in the surf and from their boats. I know a few folks that are very happy with this at the moment.
- **Rusty Hudson:** I support the constant fishing mortality approach 4d. The lion share of fishing mortality is attributed to the recreational sector – my concerns regarding MRIP and intercepts still apply here.

Sector transfers

- **Capt. Victor Hartley:** Go with 5a-2. The comment that transfers should be not allowed is not a good idea. We should use transfers to ensure both sectors do not go over their limits. If one sector needs quota and the other sector has the ability to transfer some, then this should happen. We need to ensure we don't exceed the quotas and also support all sectors.
- **John LaFountain:** When do transfers occur? *Staff responded: transfers for the coming year (2022) are first considered in July 2021 by the Monitoring Committee based on catch and landings projections. The Board and Council then make their decision on the size of the transfer at their annual August 2021 specifications meeting.* I would like to support 5a-2, but it's hard to trust the recreational data. Therefore, I support 5a-1 until recreational catch accounting can be done more accurately.
- **Rusty Hudson:** I support 5a-2 as a tool in the toolbox. If MRIP recalibration explodes the recreational catch, you would not know that until the next year. This would kick in accountability measures. If this was the case, the recreational sector could benefit from transfers to avoid being penalized. Commercially, Florida typically transfers quota to northern states when they need it.
- **Frank Blount:** I agree with 5a-2 because I am interested in having transfers go both ways.
- **Mike Waine (member of the public):** A lot of people supported no transfers. Is that outside of the range of alternatives or can the Council and Board address that? *Staff responded: technically, this is outside of the current range of alternatives, however, this standpoint is helpful information that will be conveyed to the Board and Council for their consideration.*

Management Uncertainty

- **TJ Karbowski:** Where does recreational reform fit into this? *Staff responded: management certainty is already incorporated into management as a tool in the toolbox. One aspect of the recreational reform initiative is looking at how to best use MRIP estimates and the application to management. The uncertainty around MRIP apply to both management tools, but are definitely separate and only management uncertainty is being considered through this amendment.* Why is management uncertainty only applied as a reduction to the commercial and recreational landings limits? Shouldn't management uncertainty go both ways? I think it is ridiculous that we know MRIP numbers are overinflated and the only tool we have to address that is to reduce landings limits further. Management uncertainty should also account for inflated MRIP estimates.
- **John LaFountain:** I am in support of 6b.
- **Capt. Victor Hartley:** If you do a post-sector split, this needs to be really looked at hard. The commercial guys report so well and know what is going on. So do the party boats. I would support 6b because this heads towards a sector separation direction that we prefer.

De Minimis

- **Capt. Victor Hartley:** I would keep this at 7b, which is the least restrictive. This allows states' constituents to have hope moving forward. They already catch so few fish that they should be allowed to have measures that encourage people to go out and fish. If this leads to much more catch, there is still the *de minimis* threshold that will prevent this from occurring the next year.
- **Robert Lorenz:** I support 7c. Things are changing right now with an explosion of recreational boating. In looking into the future, 7c allows states to think about their own management measures and what fits best. They need to look into the potential that species need to be managed on a tighter and tighter basis. Reporting of recreational catch is also becoming more important.

Comments Received by Email

From: PAUL CARUSO [mailto:pkcaruso@comcast.net]
Sent: Tuesday, April 27, 2021 7:53 AM
To: Dustin C. Leaning <DLeaning@asmfc.org>
Cc: nichola.meserve@mass.gov
Subject: [External] Re: Reminder: Bluefish Addendum Comments

Reallocation: I support a more contemporary data set but one that will incorporate some of the prior distribution patterns 1999 to 2018 87/13 split, 2a-3 with a 5-year phase in.

Commercial allocation to states: 2009 to 2018, similar reasons as above 3a-3, phased over 5 year.

I am opposed to state-by-state transfers, fish do not come with quota, local availability can drive catch rates and not indicative of distribution over wider area, this causes conflicts with the recreational fishery and can result in localized depletion.

I support a minimum commercial allocation to states with no allocated quota.

I support a constant catch rebuilding strategy or P*, for the quickest recovery.

I do not support sector transfers. Leave the unused landings in the water to support robust stocks.

Sincerely, Paul G. Caruso

Massachusetts Recreational Advisor

From: John LaFountain [mailto:foxseafood@gmail.com]
Sent: Monday, May 3, 2021 12:05 PM
To: Dustin C. Leaning <DLeaning@asmfc.org>
Subject: [External] Re: Bluefish AP Summary - please review by 5-5-21

Hi Dustin,

-If you could include some of my written comment about the economic and social impacts. I know you said that is on a separate document. That is fine I just want to make sure that my comment is on that document.

-I think we are missing a chance here to set a federal size limit. In the last 10 years I have purchased fish from North Carolina and Virginia probably every time there is a run of fish. In the last 3-4 years 50% of the time the fish is under 2 lbs and often times under 1 lb. These are not mature sized fish. They do land a lot of 3-4 lb fish as well and I don't have a problem with that. But if they are landing 500,000 lbs a year of fish that don't have a chance to reproduce it's going to be hard to rebuild.

- Every year in the past I purchased bluefish in the spring particularly the month of April. The fish are racing up the coast from down south. We call them "racers" because they are so skinny. The big boats in New Jersey would just crush them catch tons of them and freeze them whole to be sold later. Whether I bought them fresh or frozen in April there was no meat on them and they were full of roe. The large egg masses. Always without exception the spring time April bluefish racers or runners were always caught before they reached where they were headed to lay their eggs. We can't have this happening if we are to rebuild the stock.

I don't know where you can include these comments but I think they need to be seen and thought about in this amendment.

Bluefish Allocation and Rebuilding Amendment

Alternatives Reference Guide

How to Use This Reference Guide

This reference guide provides a quick overview of the alternatives under consideration in this amendment. This document is intended to be used in conjunction with the amendment Public Hearing Document, which provides more detail on the alternatives and their basis as well as possible impacts. The tables, sections, and appendices referenced throughout this document are all contained in the Public Hearing Document. **We strongly encourage all interested individuals to review the full Public Hearing Document before submitting comments.** Informed comments on these alternatives cannot be made based on this document alone without also considering the background and implications described in the Public Hearing Document.

The final section on page 5 includes several decision trees. These decision trees are intended to guide the flow of selecting alternatives as decisions in one section will dictate how other alternative sets should be interpreted. Decision trees 1-3 are included to help guide public comment on those sections that are tied together (i.e., Sections 5, 6, and 7).

Introduction

The Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission (Commission) are jointly developing the Bluefish Allocation and Rebuilding Amendment. This amendment considers:

1. Revisions to the fishery management plan (FMP) goals and objectives;
2. Modifying the current allocations between the commercial and recreational sectors;
3. Modifying the current commercial allocations to the states;
4. Initiation of a rebuilding plan;
5. Revisions to the quota transfer process;
6. Revisions to how the FMP accounts for management uncertainty; and
7. Revisions to the *de minimis* provisions in the Commission's FMP.

How to Provide Comments

Comments may be submitted at any of five virtual public hearings to be held between March 24 and April 8, 2021 or via written comment through April 23, 2021. Please visit https://www.mafmc.org/bluefish-amendment for a hearing schedule and instructions for submitting comments.

To be most effective, we request that you identify which alternative you support in each of the categories. It is helpful to include specific details as to why you support or oppose a particular alternative.

This reference guide is intended to be used in conjunction with the amendment Public Hearing Document, which provides more detail on the alternatives and their possible impacts. Informed comments on these alternatives cannot be made based on this document alone without also considering the background and implications described in the Public Hearing Document.

SUMMARY OF ALTERNATIVES

Note: Table numbers referenced throughout this section refer to the table numbers in the Public Hearing Document.

1. Fishery Management Plan Goals and Objectives

Public Hearing Document Section 4.0

This amendment considers revisions to the FMP goals and objectives. While these revisions are not included as an explicit alternative, the Council and Board will need to approve the revised goals and objectives through this amendment. The current and proposed FMP goals and objectives can be found in the Public Hearing Document.

2. Commercial/Recreational Allocations

Public Hearing Document Section 5.0

Commercial/Recreational Allocation Alternatives (Table 1)

This alternative set considers changes to the allocation of bluefish between the commercial and recreational sectors. The current allocations are highlighted in green. Alternatives 2a-2 through 2a-5 would revise allocations based on updated data using modified base years. It is important to note that while the proposed allocation percentages directly affect the annual commercial quotas and recreational harvest limits, these limits are also influenced by total catch limits, recent discard trends, and other factors.

Allocation Percentages	
Alternative	**Basis**
2a-1: 83% recreational, **17%** commercial	No action/status quo (1981-1989 landings data)
2a-2: 89% recreational, **11%** commercial	Multiple approaches: 2014-2018 and 2009-2018 catch data
2a-3: 87% recreational, **13%** commercial	1999-2018 catch data
2a-4: 86% recreational, **14%** commercial	Multiple approaches: 1981-2018 catch data; 2014-2018 and 2009-2018 landings data
2a-5: 84% recreational, **16%** commercial	Multiple approaches: 1981-2018 and 1999-2018 landings data

Allocation Change Phase-In Alternatives (Table 4)

This alternative set considers whether any changes to the allocation percentages should occur in a single year or if the change should be spread over multiple years.

Phase-in Alternatives
2b-1: No phase-in
2b-2: Allocation change spread evenly over the same duration as the selected rebuilding plan

3. Commercial Allocations to the States

Public Hearing Document Section 6.0

This section contains four alternative sets related to commercial bluefish allocations to the states.

Commercial Allocations to the States Alternatives (Table 6)

The table below lists the alternatives under consideration for the bluefish commercial allocations to the states using only landings data since commercial discards are considered negligible. The percent allocations represent the share of coastwide quota that is annually allocated to each state. The current allocations are represented by

the no action/status quo alternative (alternative 3a-1, highlighted in green in Table 6). Alternatives 3a-2 through 3a-4 propose modifications to state allocations based on updated data using modified base years.

Landings-Based Allocation Alternatives				
State	3a-1	3a-2	3a-3	3a-4
	No action/ Status quo (1981-1989)	5 year (2014-2018)	10 year (2009-2018)	1/2 '81-'89 1/2 '09-'18
ME	0.67%	0.00%	0.01%	0.49%
NH	0.41%	0.03%	0.12%	0.33%
MA	6.72%	10.64%	10.16%	7.66%
RI	6.81%	11.81%	9.64%	7.59%
CT	1.27%	1.18%	1.00%	1.19%
NY	10.39%	20.31%	19.94%	13.01%
NJ	14.82%	11.23%	13.94%	14.57%
DE	1.88%	0.58%	0.40%	1.47%
MD	3.00%	1.50%	1.84%	2.68%
VA	11.88%	4.62%	5.85%	10.26%
NC	32.06%	32.06%	32.38%	32.13%
SC	0.04%	0.00%	0.00%	0.03%
GA	0.01%	0.00%	0.00%	0.01%
FL	10.06%	6.07%	4.75%	8.59%
Total	**100.02%**	**100.01%**	**100.03%**	**100.00%**

Commercial Allocation Change Phase-In Alternatives (Table 8)

This alternative set considers if any changes to the allocation percentages considered through alternative set 3a should occur in a single year (alternative 3b-1, no phase-in) or if the change should be spread out over 4, 5, or 7 years (alternative 3b-2). The Council and Board agreed that if alternative 3b-2 is selected, the duration over which new allocations will be phased in will match the duration of the selected rebuilding plan (section 7).

Phase-in Alternatives
3b-1: No phase-in
3b-2: Allocation change spread evenly over the same duration as the selected rebuilding plan

Commercial Quota Trigger Alternatives (Table 10)

This alternative set describes options to implement quota-based triggers that would reallocate any commercial quota that exceeds a specified threshold. This alternative set could allow state allocations to vary with overall stock abundance and resulting coastwide commercial quotas.

Commercial Quota Time Series	No Trigger Alternative: 3c-1	Pre-Transfer Alternative: 3c-2	Post-Transfer Alternative: 3c-3
No Action/Status quo [3a-1]	No trigger approach implemented	N/A	N/A
5-year (2014-2018) [3a-2]		3.67 M lbs	6.67 M lbs
10-year (2009-2018) [3a-3]		4.31 M lbs	8.21 M lbs
½ 1981-1989 and ½ 2009-2018 [3a-4]		4.31 M lbs*	8.21 M lbs*

This reference guide is intended to be used in conjunction with the amendment Public Hearing Document, which provides more detail on the alternatives and their possible impacts. Informed comments on these alternatives cannot be made based on this document alone without also considering the background and implications described in the Public Hearing Document.

Commercial Minimum Default Allocation Alternatives (Table 13)

This alternative set considers whether to establish minimum default commercial quota allocations for each state within the bluefish management unit. A minimum default allocation provides each state with a fixed minimum percentage allocation of the coastwide commercial quota, and the remainder would be allocated based on the commercial allocation alternative selected from alternative set 3a.

Minimum Default Allocation Alternatives	
3d-1	No Action/Status quo: No Minimum Default Allocation
3d-2	0.10% Minimum Default Allocation
3d-3	0.25% Minimum Default Allocation

4. Rebuilding Plan

Public Hearing Document Section 7.0

This section contains four rebuilding plan alternatives. The no action option (4a) is included only as a formality, as the Council is legally bound to develop a rebuilding plan.

Rebuilding Plan Alternatives (Table 16)

Alternative	Rebuilding Plan	Duration	Adjustment to Council Risk Policy
4a	No Action/ Status Quo	N/A	N/A
4b	Constant Harvest	4 years	No
4c	P* (Council Risk Policy)	5 years	N/A
4d	Constant Fishing Mortality	7 years	Yes

5. Quota Transfer Provisions

Public Hearing Document Section 8.0

The following alternatives describe options for allowing annual transfers of quota between the commercial and recreational sectors as part of the specifications setting process (i.e., the annual process of setting or reviewing catch and landings limits for the upcoming fishing year).

Sector Transfer Provisions Alternatives (Table 20)

This alterative set offers the ability for transfers to occur bi-directionally between the commercial and recreational sectors (alternative 5a-2). The status quo alternative (5a-1) only allows for quota transfers from the recreational to commercial fishery.

Alternatives	Annual Quota Transfer Alternatives
5a-1	No Action/Status Quo
5a-2	Allow for optional bi-directional transfers through the annual specifications process with pre-defined guidelines and process. The transfer would consist of a portion of the total ABC in the form of a landings limit (i.e., commercial quota and RHL) transfer. Transfers would not occur if the stock is overfished or overfishing is occurring.

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Transfer Cap Alternatives (Table 22)

This alternative set considers whether to establish a cap on the amount that can be transferred between sectors.

Alternatives	Transfer Cap
5b-1	No Action/Status Quo
5b-2	Up to 10% of the ABC

6. Management Uncertainty Alternatives

Public Hearing Document Section 9.0

This alternative set considers modifications to the process for accounting for management uncertainty in the specification setting process. Under the status quo alternative (6a), a single management uncertainty buffer is applied to the commercial and recreational sectors equally. Alternative 6b would allow for management uncertainty to be accounted for within each sector.

Management Uncertainty Alternatives (Table 24)

Alternatives	Management Uncertainty Alternatives
6a	No Action/Status Quo
6b	Post-Sector Split

7. De Minimis Provisions

Public Hearing Document Section 10.0

This section considers modifications to the *de minimis* provisions contained in the Commission's FMP. For a more detailed description of each *de minimis* alternative, please reference Section 10 of the Public Hearing Document.

De Minimis Provisions Alternatives (Table 25)

Alternatives	***De Minimis* Alternatives**
7a	No Action/Status Quo
7b	Recreational *De Minimis* – no management measures
7c	Recreational *De Minimis* – state-selected management measures
7d	Recreational *De Minimis* – rollover management measures
7e	Recreational *De Minimis* – 2020 management measures

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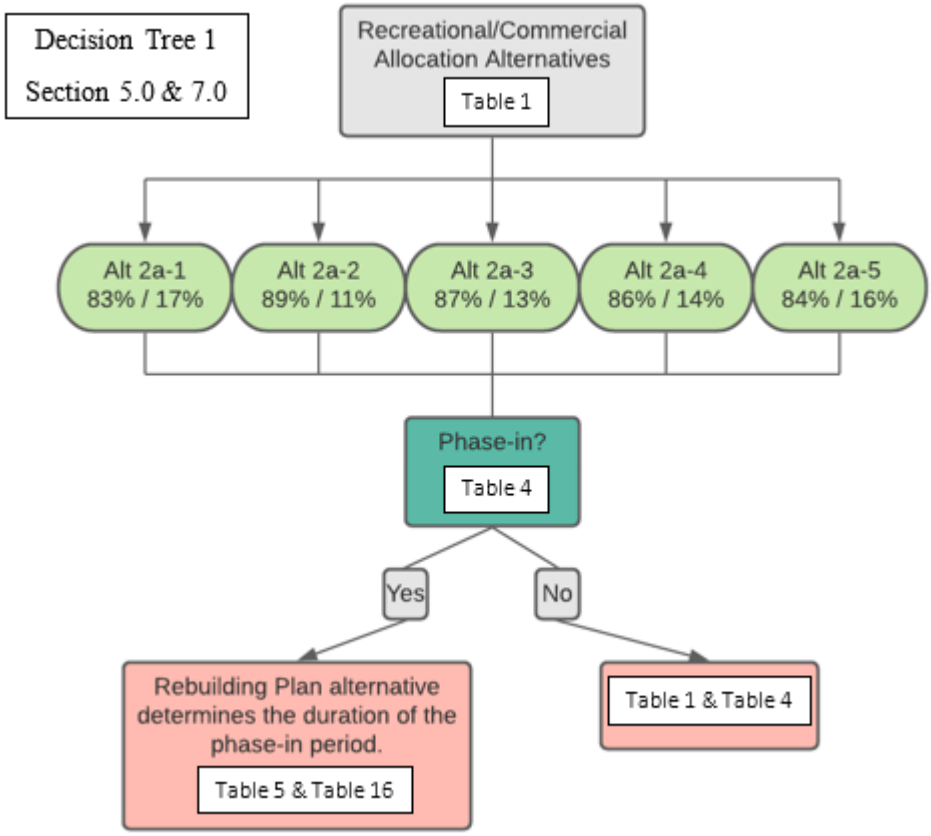
Decision Trees

Decision trees are included to help guide the flow of commenting on alternatives as some decisions may impact the alternatives that will be selected in different alternative sets. For example, if a phase-in alternative is selected in either the sector allocations or commercial allocations to the states alternative set, the duration as to how long the allocations will be phased-in will match the durations of the preferred rebuilding alternative. **Note:** The tables listed in the decision trees directly reference the tables within the Public Hearing Document.



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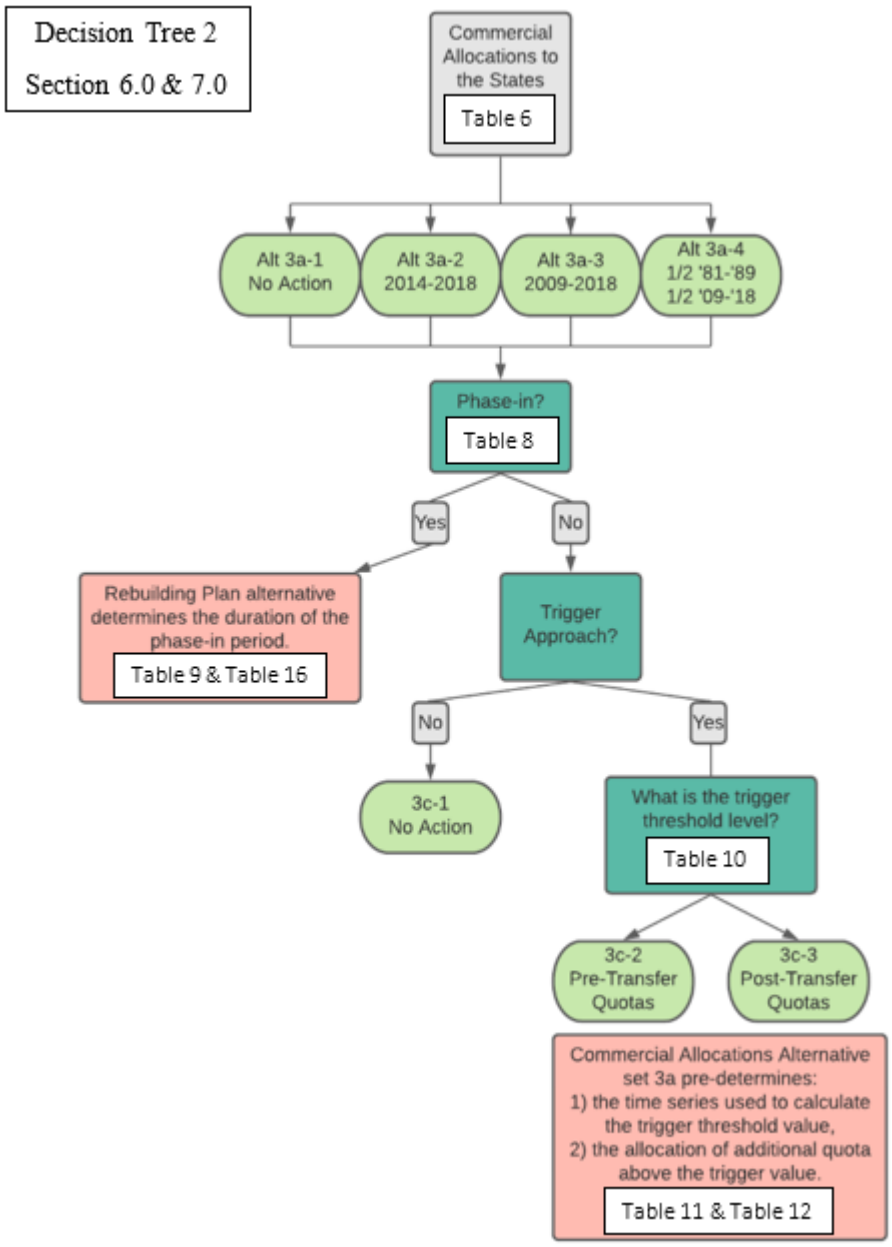

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