MARINE FISHERIES ADVISORY COMMISSION
BUSINESS MEETING AGENDA
8:30 AM
Tuesday, March 21, 2023
Via Zoom
Login: https://bit.ly/3Jijiwo
Call In: 1-312-626-6799
Webinar ID: 893 0519 0277

1. Introductions, Announcements and Review of March Agenda (8:30 – 8:35)
2. Review and Approval of February 2023 Draft Business Meeting Minutes (8:35 – 8:45)
3. Comments (8:45 – 9:15)
    a. Chairman
    b. Commissioner
    c. Law Enforcement
    d. Director
4. Upcoming Emergency Rule Making for Recreational Fisheries (9:15 – 10:00)
    a. Black Sea Bass and Scup
    b. Cod and Haddock
5. Discussion Items (10:00 – 11:00)
    a. Federal Fisheries Management Update
    b. Protected Species Management Update
    c. Update on Grant Programs for Gear Marking, Vessel Trackers, Resiliency, and Atlantic Herring Disaster Relief
    d. Shellfish Advisory Panel Meeting Summary
    e. Anticipated Public Hearing and MFAC Meeting Schedule
6. Presentation on DMF Circle Hook Study (11:00 – 11:30)
7. Other Business (11:30 – 11:45)
    a. Commission Member Comments
    b. Public Comment
8. Adjourn (11:45)

All times provided are approximate and the meeting agenda is subject to change. The MFAC may amend the agenda at the start of the business meeting.

Future Meeting Dates To Be Determined

MARINE FISHERIES ADVISORY COMMISSION
February 13, 2023
Via Zoom

In attendance:
Marine Fisheries Advisory Commission: Raymond Kane, Chairman; Michael Pierdinock, Vice-Chairman; Kalil Boghdan; Shelley Edmundson; Bill Amaru; Bill Doyle; Arthur "Sooky" Sawyer; and Lou Williams. Absent: Tim Brady

Division of Marine Fisheries: Daniel McKiernan, Director; Mike Armstrong, Deputy Director; Bob Glenn, Deputy Director; Kevin Creighton, Assistant Director; Story Reed, Assistant Director; Jared Silva; Julia Kaplan; Nichola Meserve; Melanie Griffin; Stephanie Cunningham; Kelly Whitmore; Jeff Kennedy; Dave Martins; Derek Perry; Nick Buchan; Scott Schaffer; Kerry Allard; and Alex Boeri.

Department of Fish and Game: Ronald Amidon, Commissioner.

Massachusetts Environmental Police: Lt. Bass

Members of the Public: Stormy Mayo, Daniel Gibson, Heather Haggerty, Mike Waine, Gerry O'Neill, Matt Belson, David Meservey, Phil Coates, Nora Blair, Beth Casoni, Thomas Novitsky, Sarah Martinez, Sharl Heller, Marissa McMahan, Lizzie Roche, Bill Sargent, Barbara Brennessel, Brad Winn, Brett Hoffmeister, Paul Ward, Mark Faherty, Katie Rodrigue, Eric Lorentzen, Denise Stowell, David Glover, Deborah Cramer, Domenic Santoro, Diane, Jo, Butch, Liz, and Kenny.

INTRODUCTIONS AND ANNOUNCEMENTS

Chairman Ray Kane called the February 13, 2023 Marine Fisheries Advisory Commission (MFAC) business meeting to order.

REVIEW OF FEBRUARY 13, 2023 BUSINESS MEETING AGENDA

No changes to the agenda were requested.

REVIEW AND APPROVAL OF DECEMBER 20, 2022 DRAFT BUSINESS MEETING MINUTES

No edits or comments were provided. Chairman Kane asked for a motion to approve the December 20, 2022 draft business meeting minutes. **Shelley Edmundson made the motion to approve the December 20, 2022 business meeting minutes. Bill Amaru seconded the motion. A roll call vote was taken and the motion passed unanimously 6-0 (Sooky Sawyer was absent during this vote).**

CHAIRMAN'S COMMENTS

Chairman Ray Kane thanked everyone for their attendance and turned the floor over to the Commissioner.

COMMISSIONER'S COMMENTS

Commissioner Ron Amidon visited Cat Cove Marine Lab this past month and congratulated Dan McKiernan, Kevin Creighton, and Dr. Mike Armstrong on their efforts restoring the laboratory. Ron was working to find some additional funding to bring the lab to its full potential.

LAW ENFORCEMENT COMMENTS

Lt. Matt Bass handled the comments for the Massachusetts Environmental Police (MEP). MEP was working with DMF to retrieve any gear remaining within the state waters fixed gear closure that began on February 1. He stated that compared to last year (2022), there is a lot less gear in state waters.

DIRECTOR'S COMMENTS

Director Dan McKiernan thanked everyone for their attendance and their flexibility regarding the change in meeting schedule.

He stated the Shellfish Advisory Panel is scheduled to meet at the beginning of March. DMF intended to address its concerns regarding the potential for state regulated commercial fishing activities—particularly hydraulic surf clam dredging—to be constrained by municipal conservation commissions ("ConCom") under the Wetlands Protection Act. This issue came to the forefront several years ago as a result of Provincetown enforcing local ConCom regulations restricting hydraulic dredging off Herring Cove.

DMF was in the process of putting together a list of nominees for the open at-large seats on the New England Fishery Management Council. The list will be submitted to the Governor's office on February 15 for review. The Governor is then expected to submit her list on to NOAA Fisheries on March 15. Dan reminded the Commission they should have received an email containing the bios of DMF's four preferred nominees and a request for their input regarding the candidates.

Dan McKiernan closed his comments by commending Brian Castonguay for his work on the Cat Cove Marine Lab.

ITEMS FOR PUBLIC HEARINGS

<u>Commercial Summer Flounder Limits</u>
Dan McKiernan highlighted various issues regarding reduced participation within the commercial summer flounder fishery. Dan and Jared Silva then explained the public

hearing proposals, which they described as designed to increase participation and landings to more fully utilize the available quota. The proposals are enumerated below:

1. Adjust the so-called “landing window”, so that vessels may offload summer flounder from 6AM to 10PM, rather than 6AM to 8PM.
2. For summertime Period II fishery (April 23–September 30), either:
   a. adopt a weekly aggregate pilot program for trawlers exempting them from daily limits in favor of a weekly limit; or
   b. increase the trip limit for trawlers from 500 pounds to 800 pounds with a scheduled increase to 1,000 pounds on September 1 (rather than 800 pounds) if more than 20% of the quota remains.
3. Adjust the bycatch allowance provision for the small mesh squid fishery. Rather than setting it at a 100-pound limit for summer flounder when fishing for small mesh or when in possession of more than 250 pounds of squid, have this limit only apply when fishing with small mesh.
4. For the fall Period II fishery (October 1–December 31), increase the trip limit from 3,000 pounds when more than 5% quota remains and 800 pounds otherwise to 10,000 pounds when more than 5% of the quota remains and 1.000 pounds otherwise.
5. For Period I (January 1 – April 22), increase the regulatorily set limit from 3,000 pounds to 10,000 pounds.

Dan welcomed any questions from the Commission.

Bill Amaru asked for clarification regarding the bycatch allowance provision. Jared Silva provided some history on the provision and noted the state’s rules are currently more restrictive than required by the federal fishery management plan (FMP). Jared then explained this change would align the state rules with the FMP and encourage vessels trip fishing for squid during the spring and summer to land in Massachusetts.

Bill Amaru expected there would be some debate at public hearing on the proposed trip limits adjustments and a weekly aggregate limit program. His initial preference was for a higher daily trip limit and he expressed concern these proposals may change the fleet composition of the summertime fishery.

<u>Commercial Horseshoe Crab Management</u>
Director McKiernan introduced DMF’s commercial horseshoe crab management proposal to the Commission. The proposals are enumerated below:

1. <u>Permitting.</u>
   a. Establish a new biomedical horseshoe dealer permit.
   b. Establish a new biomedical processor dealer permit. This permit may be limited in issuance.
2. <u>Conservation</u>.

a. Adopt a January 1 – May 31 closure to all horseshoe crab harvest and rescind the existing five-day closures around each new and full moon from mid-April through June.
b. Establish an annual processor quota for the biomedical fishery of 200,000 horseshoe crabs. This quota will be allocated evenly among biomedical processors.
c. Reduce the bait quota by 25,000 horseshoe crabs from 165,000 to 140,000 horseshoe crabs.

3. Bait Fishery Trip Limits
    a. Consider increasing the trip limits for all permitted bait harvesters up to 500 crabs. Current limits are 300 crabs for permitted trawlers and 400 crabs for permitted hand harvesters.
    b. Consider re-issuing Letters of Authorization to certain mobile gear fishers who do not hold a horseshoe crab permit to land a full trip limit of horseshoe crabs, not the 75-horseshoe crab incidental limit.
4. Reporting. Beginning in 2024, require daily electronic reporting for all bait and biomedical harvesters.
5. Permit Conditions. Adopt certain existing permit conditions affecting biomedical harvesters, biomedical dealers, and biomedical processors in regulation.

Dan then asked Jared Silva to provide further details regarding the items for public hearing proposals.

Jared stated the most recent stock assessment demonstrated the state's horseshoe crab resource was not in poor condition. DMF believes the fishery is sustainable at current levels of exploitation and mortality, as our survey indices have improved over the past ten-years with fairly consistent exploitation. However, DMF was concerned about opportunities for unconstrained growth in the biomedical fishery and how this may impact the long-term sustainability of the resource. This concern prompted DMF to initiate this proposal, take precautionary approach to management, and mortality and exploitation at recent levels.

Dan clarified that the proposed 200,000 horseshoe crab biomedical harvest limit would only apply to horseshoe crabs harvested in Massachusetts biomedical fishery and would not apply to horseshoe crabs obtained and processed from other sources (e.g., horseshoe crabs borrowed from the bait fishery through the "rent-a-crab program" or harvested in another state's biomedical horseshoe crab fishery and imported into Massachusetts for bleeding).

Jared added that the lunar spawning closures would be retained for this year (2023), and if approved, the blanket spawning season closure would go into effect in 2024. He then moved on to discuss the proposal affecting bait fishery trip limits and noted this proposal attempted to balance quota utilization, fishery profitability, and regulatory discarding. Jared concluded his comments by briefly discussing reporting, permit conditions, and permit types. He expressed the need to manage the biomedical fishery in a more publicly transparent manner.

Bill Amaru stated a comprehensive observer program should be implemented for the biomedical fishery to better understand the potential impact on the resource. Dan stated DMF was in the process of reviewing potential options to increase fishery dependent data regarding the biomedical fishery.

Kalil Boghdan echoed Bill Amaru's comments regarding an observer program. Kalil then asked DMF to clarify the mortality rate assumed for the biomedical fishery. Dan asked Derek Perry to speak to this. Derek stated a 15% mortality rate is used, which accounts for post-bleeding mortality and mortality observed by the biomedical firm prior to bleeding.

Shelley Edmundson asked for clarification regarding the harvester permits for horseshoe crabs. Jared Silva stated there is a limited entry bait fishery permit that is transferable and a biomedical harvest permit that is issued to persons who have a working relationship with a biomedical dealer or processor. An individual may not hold an active biomedical and bait harvest permit at the same time. Shelley was also curious as to the number of bait and biomedical harvesters by gear type. Jared stated he did not have that data on hand, but this information could be prepared for the public hearing.

Lou Williams expressed concerns the proposed spawning closure may disproportionately impact hand harvesters and asked about the seasonality of the hand harvest fishery. Derek Perry stated the hand harvest fishery occurs primarily in May and continues into June. Jared Silva stated Lou was correct to assume the proposed spawning closure would substantially limit the hand harvest fishery.

Chairman Kane encouraged Commission members and members of the public concerned about the horseshoe crab resource to reach out to state legislators to help fund DMF research and data collection programs. Ray also supported DMF's efforts to more transparently manage the biomedical fishery.

<u>Commercial Menhaden Management</u>
Nichola Meserve introduced the commercial menhaden proposals for public hearing, which are enumerated below:

1. Define the following gear groupings for the harvest of menhaden:
    a. Small-scale directed gear: cast nets, traps (excluding floating fish traps), pots, haul seines, hook and line, bag nets, hoop nets, hand lines, and bait nets.
    b. Non-directed gear: pound nets, anchored/stake gillnets, trammel nets, drift gill net, trawls, fishing weirs, fyke nets, and floating fish traps.
2. Adopt a June 15 menhaden fishery season start date and restrict landings prior to this date to small-scale directed and non-directed gears only (i.e., no purse seines) at a 6,000-pound limit harvested from state waters, with an exception for limited access weir fishers to land at a 120,000-pound limit.
3. Revise the limited access fishery's quota use triggers and trip limits, as follows:

    a. 120,000-pound trip limit until 50% quota use.
    b. 25,000-pound trip limit after 50% quota use and until 85% quota use.
    c. 6,000-pound trip limit after 85% quota use and until 100% quota use.
4. Establish open fishing days for the use of purse seines in the menhaden fishery (both limited entry and open access):
    a. Four open days/week, Monday–Thursday, until 50% quota use.
    b. Five open days/week, Monday–Friday, until 100% quota use.
5. Restrict landings after the quota is taken to small-scale directed and non-directed gears only (i.e., no purse seines) at a 6,000-pound limit harvested from state waters.
6. Restrict landings during the EESA fishery to a 6,000-lb trip limit (both limited access and open access) harvested from state waters; the limited access trip limit may be modified by the Director to a maximum of 120,000 pounds.
7. Restrict the use of carrier vessels to only limited entry permit holders operating from June 15 until 85% quota use (i.e., at the 120,000-lb and 25,000-lb trip limits only).
8. Require that all vessels used to carry or hold fish in the limited access fishery (i.e., either the catcher vessel or the carrier vessel if used) have their fish hold capacity certified and marked to demonstrate 25,000-lb and 120,000-lb storage levels by an accredited marine surveyor, and have any fish storage capacity over 120,000 pounds rendered unusable.
9. Require that all purse seine nets used in the menhaden fishery subject to net size restrictions be annually inspected and tagged by DMF prior to fishing for compliance with these restrictions. After its certification, any net that is altered with regards to the net size restrictions must be re-inspected prior to its use.
10. Establish in the regulations the following restrictions on the use of purse seines which currently reside in permit conditions:
    a. State-wide closed days of Saturdays, Sundays, Memorial Day, July 4, and Labor Day
    b. State-wide, year-round night fishing closure
    c. Year-round closure of Buzzards Bay
    d. Friday closed day in Beverly Harbor
    e. Year-round closures in certain Boston Harbor areas (i.e., Charles River, Mystic River, Chelsea River, Dorchester Bay, Neponset River, Marina Bay, Weir River, and Winthrop Harbor, all upstream of established landmarks, and “A Anchorage Areas” with an exception for off Merrymount in Quincy)
    f. The Director may issue permit conditions further affecting the use of purse seines.
11. Establish in regulations the following restrictions on the use of purse seines for menhaden which currently reside in permit conditions:
    a. Maximum purse seine size of 600’ in length within the Inshore Restricted Waters.
    b. This action eliminates the hand haul and 400’ x 60’ maximum net size requirements for the areas of Hingham Bay, Winthrop Bay, and Quincy

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Bay within Boston Harbor, thus enabling mechanical hauling of a 600' length net consistent with other open Inshore Restricted Waters.

12. Establish in the regulations the following restrictions on the use of carrier vessels which currently reside in permit conditions:
    a. Only limited access permit holders may use a carrier vessel, limited to a single carrier vessel to be named in permit conditions.
    b. The carrier vessel is restricted to receiving menhaden once a day, only on open purse seining days, restricted to receiving and possession the applicable limited entry trip limit, and may land only once per day.
    c. Year-round prohibition on the use of carrier vessels in Boston Harbor.
13. Adopt a June 14, 2023 control date for Menhaden permit endorsements and for CAP-Purse Seine permit endorsements.
14. Require the submission of daily electronic harvester reports prior to landing from all limited access permit holders beginning in 2024.

These proposals respond to revisions of the interstate fishery management plan and are designed to improve other aspects of the state's management approach to ensure the quota is fully utilized and remains available throughout the fishing season to meet local bait demand. DMF held two industry scoping meetings (September 2022 and January 2023) that helped inform these draft proposals.

Kalil Boghdan asked about the year-round prohibition on carrier vessels in Boston Harbor. Nichola explained the rule was implemented to resolve user group conflicts with recreational fishers and other vessel traffic.

Lou Williams was concerned about quota utilization and asked whether too much quota was being set aside for the 6,000-pound trip limit. Nichola stated DMF modeled quota utilization under the proposed trip limit scenario and projected that combination of trip limits proposed would result in similar performance to recent years and result in a fishery closure in mid-September. The Director could also change the trip limits in-season to address quota utilization. Dan added that these triggers might still be modified through the public comment process.

<u>Accommodating Federal Maximum Retention and Electronic Monitoring Program</u>
Jared Silva provided background on the proposal for the MFAC. The federal maximum retention and electronic monitoring (MREM) program exempts federal groundfish sector vessels from groundfish minimum sizes and requires maximum retention and electronic monitoring. MREM started as a federal experimental fishery in 2018. It was a pilot project among GMRI, NOAA Fisheries, states to incentivize electronic monitoring and study associated challenges and inform future policy. The MREM program was recently adopted in federal regulations as part of Amendment 23. DMF was now proposing to adopt language in the CMR to accommodate the federal program.

There were no comments from the Commission on this proposal.

DISCUSSION ITEMS

Interstate Fisheries Management Update

Nichola provided the Commission with updates from the winter ASMFC meeting. She started by discussing Draft Addendum XXVII to the American Lobster FMP. The addendum, which considers measures to increase spawning stock protections for the Gulf of Maine/Georges Bank stock, was approved for public comment. Massachusetts will hold a virtual public hearing on March 15. She then discussed the winter flounder benchmark stock assessment and the Management Board's decision to maintain status quo specifications for 2023 and 2024. Nichola stated action was delayed on Draft Addendum I to the Striped Bass FMP until the spring meeting. The addendum considers allowing state-to-state commercial quota transfers. In the interim, the Technical Committee will develop stock projections under the assumption of full commercial quota utilization. Additionally, a new benchmark stock assessment for American eel was completed. The results may lead to more conservative yellow eel management. Nichola moved on to spiny dogfish. The FY23 commercial quota was set at a 59% reduction (but similar to recent years' harvest levels), while the northern region trip limit was maintained at 7500 pounds. Nichola reported on the progress of the research track assessments for spiny dogfish and bluefish, both of which will have management track assessments completed later this year for use in setting 2024 specifications.

Nichola Meserve discussed the process for setting recreational scup and black sea bass measures, both of which are subject to 10% coastwide harvest reductions. Nichola described the timeline regarding the measures and how DMF would need to go through emergency rule-making. The expected schedule would include a March 2 ASMFC meeting to approve the states' range of options, a mid-March DMF public scoping meeting, and MFAC review of DMF's preferred management approach at the March 21 business meeting.

Nichola reviewed the preliminary regional (MA-NY) scup option which includes: a 10.5" size limit for all modes except shore; a 9.5" size limit for shore fishing, a January-April seasonal closure, and reducing the for-hire bonus season bag limit to 40 fish. She noted additional modifications to the season or bag may be needed to achieve the 10% reduction and these analyses and discussions remain ongoing.

For black sea bass, Massachusetts is part of the MA-NY management region. However, unlike scup, regionwide measures are not required allowing each state to adopt independent rules. DMF was analyzing six different options, including split-mode measures, that would achieve the mandatory 10% reduction through differing seasons, size limits and bag limits.

Federal Fisheries Management Update

Melanie Griffin briefed the MFAC on the January 2023 New England Fishery Management Council (NEFMC) meeting. Final actions and regulatory recommendations from that meeting included: (1) recommendations for recreational groundfish measures

(GOM cod, GOM haddock and GB cod); (2) approval of groundfish Framework 65 after correcting Atlantic halibut specifications; (3) monkfish specifications for 2023-2025 (Framework 13); and (4) a recommendation that NOAA Fisheries adopt a control date in the Northern Gulf of Maine scallop fishery. The NEFMC also discussed: (1) the development of an action to allow for possession of aquaculture-reared salmon; (2) planned work on ecosystem-based fishery management for 2023; (3) the development of ropeless trap fishing gear and potential interactions with mobile gear fisheries; and (4)joint action with the Mid-Atlantic Fishery Management Council regarding sturgeon interactions in the monkfish and dogfish gillnet fisheries. The NEFMC presented its annual award of excellence to Ms. Maggie Raymond and is searching for a new Executive Director after Mr. Nies announced retirement (summer 2023).

Ray Kane thanked Melanie for her presentation. Melanie welcomed questions from the Commission.

Kalil Boghdan asked about the increase in trip level for scallops in 2022. Melanie stated there is a background document she will send along that will provide him with insights regarding this topic.

Mike Pierdinock discussed the recommended recreational groundfish measures. He noted closing August to recreational Georges Bank cod fishing will be impactful, but it was necessary to maintain the fishery at other times of the year.

Protected Species Management Update

Director McKiernan provided a brief update regarding protected species. First, he focused on the Letter of Authorization issued by DMF to NOAA Fisheries allowing a series of commercial lobster fishers listed on a federal Scientific Research and Exempted Fishing Permit to fish on-demand (“ropeless”) trap gear within the seasonal trap gear closure this year. Second, DMF discussed NOAA Fisheries closure of the Massachusetts Restricted Area Wedge for this current season and DMF’s advocacy for the closure.

Matt Bass stated that gear loss reports help differentiate certain gear that is found during gear removal efforts.

There was further discussion among MEP, DMF and members of the Commission regarding gear conflicts between on-demand gear and scallopers, as well as the technology being used for on-demand gear and how fishermen would be able to locate where the gear is placed.

Sooky Sawyer asked DMF to send the map of where ropeless fishing research may be occurring in state waters. Dan stated DMF staff will provide this documentation to the MFAC.

Public Petitions

Dartmouth Saltwater Anglers on Fish Pots and Tautog

Jared Silva discussed a recent petition the Dartmouth Saltwater Anglers. The petition sought additional regulation of the black sea bass pot fishery to address concerns regarding the incidental catch and discarding of tautog. DMF did not intend to move forward with this petition and would respond directly in writing to the petitioners.

Kalil Boghdan asked for clarification as to who the petition was coming from as there were only two names listed on the petition. Jared Silva confirmed Dartmouth Saltwater Anglers is a recreational angler group.

Mike Pierdinock was unclear whether the use of the term “trawl” in the petition was designed to affect black sea bass pot gear or mobile gear fishing. Jared Silva stated he spoke with the petitioners and they were referring to black sea bass pot gear.

Request to Start Commercial Striped Bass Season Earlier

Dan McKiernan stated DMF received a request to move the opening day of the commercial striped bass season to June 1. DMF and the MFAC addressed the commercial striped bass season for 2021 and decided not to open the season earlier than June 15. recent recently addressed the season in recent rule making and determined not to open this season DMF would not be revisiting this for 2023. Dan stated his written response was sent to the petitioner, as well as the MFAC.

Mike Pierdinock asked DMF about ongoing striped bass research. Dan suggested staff could present on this at the next MFAC meeting.

OTHER BUSINESS

Commission Member Comments

Sooky Sawyer asked about who will be on the Commission that is being formed for the Fisheries Compensation Fund.

PUBLIC COMMENTS

Eric Lorentzen, a commercial fisherman who seines for menhaden generally supported DMF’s menhaden management proposal and stated he would DMF review the possibility of opening up Buzzards Bay to seining. Director McKiernan stated the area has been closed to mobile gear fishing for over 100-years.

Brett Hoffmeister represented the Associates of Cape Cod, a biomedical processor of horseshoe crabs based out of Cape Cod. He discussed some of the logistical challenges his operation would face if the spawning closures were implemented. He was also concerned about the impact this closure may have on hand harvesters and bait dealers.

ADJOURNMENT

Chairman Ray Kane requested a motion to adjourn the February MFAC business meeting. **Shelley Edmundson made a motion to adjourn the meeting. The motion was seconded by Bill Doyle. The motion was approved by unanimous consent.**

MEETING DOCUMENTS

- February 2023 MFAC Agenda
- December 2022 Draft MFAC Meeting Minutes
- Summer Flounder Public Hearing Proposal
- HSC Public Hearing Proposal
- Menhaden Public Hearing Proposal
- MREM Public Hearing Proposal
- Winter 2023 ASMFC Summary
- NEFMC Recommendation to GARFO re: Rec Limits
- December 12, 2022 Letter DMF to GARFO re: Protected Species Issues
- Dartmouth Anglers Petition
- Striped Bass Season Request and Response
- CJFAS Article

UPCOMING MEETINGS

8:30AM
March 21, 2023
via Zoom

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MAURA T. HEALEY, Governor | KIMBERLEY DRISCOLL, Lt. Governor | REBECCA L. TEPPER, Secretary | RONALD S. AMIDON, Commissioner | DANIEL J. MCKIERNAN, Director

MEMORANDUM

TO: Marine Fisheries Advisory Commission (MFAC)

FROM: Daniel J. McKiernan, Director

DATE: March 19, 2023

SUBJECT: **Proposal for Rule Making to Adjust Recreational Scup and Black Sea Bass Limits**

Overview

This memorandum serves to inform the MFAC of my intention to use emergency regulatory authority to implement revised recreational scup and black sea bass measures to achieve mandatory harvest reductions for 2023. I present my preferred approaches and seek your support for a set of measures to ensure continuity from emergency rulemaking to the subsequent final rulemaking that will be necessary over the summer.

My preferred approaches for 2023, as compared to the 2022 measures, are summarized below (Table 1). The selection of these preferred options, particularly for black sea bass, was informed by public input generated from a scoping meeting, written comment letters, and an angler feedback survey.

Table 1. DMF recommended options for recreational scup and black sea bass management in 2023.

<table>
<tr><th colspan="4">SCUP</th><th colspan="4">BLACK SEA BASS</th></tr>
<tr><th>Mode</th><th>Season</th><th>Bag</th><th>Size</th><th>Mode</th><th>Season</th><th>Bag</th><th>Size</th></tr>
<tr><td>Private Vessels</td><td><s>Jan 1 – Dec 31</s>
May 1 – Dec 31</td><td>30 fish*</td><td><s>10” min</s>
10.5” min</td><td rowspan="5">Private Vessels, Shore, & For-hire Vessels</td><td rowspan="5"><s>May 21 – Sep 4</s>
May 20 – Sep 7</td><td rowspan="5">4 fish</td><td rowspan="5"><s>16”</s>
16.5”</td></tr>
<tr><td>Shore</td><td><s>Jan 1 – Dec 31</s>
May 1 – Dec 31</td><td>30 fish</td><td><s>10” min</s>
9.5” min</td></tr>
<tr><td rowspan="3">For-hire Vessels</td><td><s>Jan 1 – Apr 30</s></td><td><s>30 fish</s></td><td rowspan="3"><s>10” min</s>
10.5” min</td></tr>
<tr><td>May 1 – Jun 30</td><td><s>50 fish</s>
40 fish</td></tr>
<tr><td>Jul 1 – Dec 31</td><td>30 fish</td></tr>
</table>

* 150 fish/vessel maximum

Background

Determination of Required Reductions. In December 2022, the Atlantic States Marine Fisheries Commission (ASMFC) and Mid-Atlantic Fishery Management Council (MAFMC) approved 10% coastwide harvest reductions for both scup and black sea bass. These outcomes were based on application of the newly approved Harvest Control Rule,[1] which makes improvements to the typical process of comparing predicted harvest under status quo measures to the upcoming year's recreational harvest limit (RHL) to determine when the recreational measures can be left unchanged, liberalized, or must be restricted. The major improvements include the incorporation of uncertainty around the harvest estimates when comparing to the RHL, and consideration of stock biomass with regards to its target level to cap the amount of change. In the case of scup and black sea bass, predicted harvest under status quo measures, even when incorporating reasonable error bars, is expected to exceed the 2023 RHL; however, because stock biomass is more than 150% the target level, the amount of reduction is capped at 10% rather than the larger amounts that would be required to achieve the RHL precisely.

The ASMFC and MAFMC voted to achieve the 10% reduction for scup by revising the federal measures and requiring the states to further amend their state regulations under the regional ASMFC process. For black sea bass, the ASMFC and MAFMC voted to achieve the 10% reduction through the regional ASMFC process rather than a uniform set of coastwide measures. During January–February, the states developed a suite of regulatory options, which were approved by the ASMFC in early March. We are limited to these approved options. Failure to implement compliant regulations will result in a non-compliance finding by the ASMFC and allow the Secretary of Commerce to intercede and close our black sea bass and scup fisheries until such a time that compliant rules are implemented.

For scup, the recommended federal measures would close January–April and reduce the bag limit by 10 fish, resulting in a May 1–December 31 open season, 40 fish bag limit, and 10" minimum size.[2] The states of Massachusetts through New York, where about 95% of scup are landed on average, comprise the Northern Region for recreational scup management and have an informal agreement to implement uniform regulations for the sake of interstate consistency. DMF has worked with the corresponding agencies in the Northern Region to develop a consistent set of regulations for 2023 to achieve a regional 10% reduction.

For black sea bass, the ASMFC plan establishes three regions: Massachusetts through New York, New Jersey, and Delaware through North Carolina. The ASMFC determined that each region would take a 10% reduction to achieve the overall 10% reduction. Within our Northern Region, it was determined that each state would take a 10% reduction achievable through separate actions by each state rather than uniform rules across the region (e.g., scup).

For 2023, a new method of estimating recreational catch under sets of regulations was used—a statistical model named the "Recreational Demand Model" (RDM) developed by the Northeast Fisheries Science Center. Whereas the prior method relied exclusively on prior years' catch data from the Marine Recreational Information Program (MRIP), the RDM also incorporates year class strength, population size, and angler preferences on harvest and discards. Year class strength and

[1] https://www.govinfo.gov/content/pkg/FR-2023-03-09/pdf/2023-04588.pdf

[2] The ASMFC has since recommended that NOAA Fisheries reconsider the need to close January–April based on the expected state waters' measures. The MAFMC has yet to meet again to reconsider this issue.

population size are based on stock assessment projections. Angler preferences are based on a survey of anglers from Maine through Virginia. This model also accounts for the interaction of summer flounder, scup, and black sea bass fishing regulations on angler behavior. This model was used to predict harvest in 2023 under status quo measures for comparison to the RHL, as well as in the states' development of regulatory options for 2023. One downside to this approach was that the model could only be run (for all states) by a single individual at NEFSC, with impacts on the efficiency of option development. The interaction of the three species' regulations also contributed to a need to develop a limited set of options.

Scup Regional Recreational Options Development. The Northern Region's development of options for scup considered a number of factors including:

1) Achieving the reduction through a bag limit change would require drastic action (e.g., a 15-fish bag limit coastwide achieves only a 5% reduction).
2) Most seasonal closures would affect the states in our region differently.
3) A ½" size increase can achieve a regionwide 10% reduction, but this would follow 2022's one-inch size increase. There are environmental justice concerns related to higher minimum size limits for this species (e.g., loss of shore fishing access).
4) The anticipated federal rules.
5) Opening January–April and increasing the for-hire bonus season bag limit from 45 fish to 50 fish were the last liberalizations taken within the region (in 2019).
6) Being open in January–April provides limited benefit but has produced unrealistically high catch estimates in both MA and NY (likely a result of sample size related issues) that become part of the timeseries.

The Northern Region state agencies developed a single option for scup that was approved by the ASMFC. The option is focused on achieving most of the required reduction through a size limit increase with an exception for the shore mode, while also complementing the anticipated federal open season and possession limit. We collectively endorsed:

- increasing the minimum size limit to 10.5" for vessel-based fishing, while decreasing the minimum size limit for shore fishing to 9.5"
- closing January–April, and
- reducing the for-hire bonus season bag limit to 40 fish.

Black Sea Bass Massachusetts Recreational Options Development. Massachusetts' development of options for black sea bass considered a number of factors including:

1) Taking the reduction by season (from the front or tail end) would require starting in early June or ending in early August, and such shortening of the season has not been favored in prior years of comment.
2) Prior comment has suggested different priorities among user groups (e.g., prioritizing of a higher bag limit by for-hire captains versus a willingness to forgo a higher bag for greater season length among private anglers) and for-hire captains have asked DMF to consider mode-specific measures tailored to each fishery.
3) Restrictions on the for-hire fishery have limited impact on overall harvest given the mode's minor contribution to overall harvest (~10%).
4) Extending the season into the fall would provide valuable information about catch rates for future use in management.
5) A Saturday opening date has been preferred in prior years.

DMF developed a range of six management options for ASMFC consideration, all of which were approved (Table 2). These focus on achieving the reduction through a size limit increase or bag limit reduction thereby avoiding significant seasonal cuts or even providing an opportunity to lengthen the season (for some). Several options consider mode-specific regulations, as well as not placing further restrictions on the for-hire mode to sustain this manner of access to the non-vessel-owning public.

Table 2. Massachusetts range of ASMFC-approved management options for black sea bass.

	Mode	Min. Size	Bag Limit	Open Season
Status Quo	Private Vessel, Shore, and For-hire Vessel ("All")	16"	4 fish	5/21 – 9/4
Option 1	All	16.5"	4 fish	5/20 - 9/7
Option 2	All	16"	3 fish	5/20 - 9/2
Option 3	All	16"	4 fish	5/20 - 6/30
			2 fish	7/1 - 9/11
Option 4	Private/Shore	16"	3 fish	5/20 – 8/31
	For-hire		4 fish	
Option 5	Private/Shore	16"	2 fish	5/20 - 10/24
	For-hire		4 fish	5/20 - 9/4
Option 6	Private/Shore	16"	3 fish	5/20 - 6/30
			1 fish	7/1 - 8/31
			3 fish	9/1 - 10/23
	For-hire		4 fish	5/20 - 9/4

Public Input

DMF held a virtual scoping meeting on March 13 and welcomed written comment submissions between February 28 and March 15 on both the scup and black sea bass options. Over 30 people attended the scoping meeting with nine providing oral comment (Attachment 1); 63 emailed comments were received (Attachment 2). In addition, DMF developed an online survey to collect public feedback on the black sea bass options. The survey, available from March 10–15, engaged a much larger number of constituents: 807 entries in which the options were ranked, including over 400 responses that provided some explanation of their rationale (Attachment 3).

General Comment. Several themes of comment applicable to both species included:

- General displeasure and disbelief with the need for reductions for both species given their stock status.
- Re-direction of blame on the commercial fisheries or flawed MRIP data.
- Frustration with the instability of measures year-over-year.

Scup. Overall, the comment was limited, likely by there being only one option. However, several notable areas of comment included:

- Support for pursuing a change in the FMP to allow quota transfers between the recreational and commercial sectors, particularly given the amount of underutilized scup commercial quota.
- Dissatisfaction with there being only one option, especially with no public input opportunity prior to its development.

- Support for a separate and lower minimum size for shore-based anglers.
- Members of the for-hire fleet sought to retain the 50-fish bag limit during the for-hire bonus season (May/June), fearing the 40-fish limit would not attract as many customers, particularly from out-of-state. To accomplish this, they supported an 11" for-hire minimum size limit. Given the availability of large scup in MA waters, they felt this would not impact their businesses.

Black Sea Bass. Comment was plentiful on the proposed sea bass options. Overall, comment from the scoping meeting was largely for-hire captains; written comment was a mixed bag of private-vessel-based anglers, for-hire captains, and party/charter patrons (most identifying with a particular vessel); and the survey respondents were dominated (94%) by recreational anglers. The survey also allowed us to look at preferences between anglers who primarily fish by private vessel, for-hire vessel, or shore; and contrast the views of for-hire captains and their clientele. Many of the individuals that commented at the scoping meeting and/or submitted a written emailed comment also completed the survey, and these results will be what is mostly enumerated below.

Some common themes of comment were:

- For-hire captains were pleased to "finally" see the Division propose mode-specific regulations, particularly those holding the for-hire fishery status quo to "ensure their survival". However, many, many recreational anglers voiced an ardent philosophical disagreement with mode splits, particularly those that favor one segment of the fishery over the other. These spoke to an inherent unfairness, favoritism for the wealthy, and how their investment into the fishery and impact on the economy is of no less value (or is greater). While some seemed more accepting of a mode split in recognition of keeping businesses afloat, they did not think it should come at the expense of private anglers. This dynamic led to a clear dichotomy of private anglers largely supporting Option 1 (within the survey, 380 out of 756) and for-hire captains largely supporting Option 6 (within the survey, 25 out of 51). Due to the volume of recreational anglers responding, Option 1 was the highest ranked "Most Preferred" option in the survey.
- Interestingly, there was a difference of opinion between for-hire captains and their patrons. As reported above, for-hire captains preferred Option 6 in oral, written, and survey responses. However, within the survey, those that identified as recreational anglers that fish primary from a party/charter vessel preferred Option 1 most, although the sample size was limited (11 out of 29), with Option 5 the second most preferred (7 out of 29).
- There were private anglers that supported Options 5 and 6 as their preferred options, primarily for the season extension into October. Those anglers opposing Option 5 and 6, in addition to disagreeing with an unbalanced mode split, often remarked on the seasonal 1- or 2-fish bag limits being too small to make these options palatable.
- Many angler and for-hire business comments reflected on the high availability of well over legal size black sea bass. Both modes seemed to position a size limit increase as the least negative change compared to a bag limit reduction or season shortening. Many reported routinely discarding all fish below a size greater than the minimum limit (e.g., 17" or 18").
- The for-hire fleet was vocal in saying a 4-fish bag limit was the absolute lowest that would keep them in operation.
- Many comments spoke in favor of simplicity of regulations to improve compliance, noting in particular that Option 5 and 6 were complicated and would reduce compliance. Options 1 and 2 were viewed as the simplest to adhere to and the least changed from 2022's measures. Calls for more enforcement were common.

Discussion of DMF Preferred Options

Scup. I support moving forward with the presented option for scup. It would be difficult—if not impossible—to make a revision to the regionally-developed and ASMFC-approved approach at this time. There are benefits to working as a region to adopt uniform regulations, including compliance and perceived fairness. Regarding the latter, black sea bass stands as a stark example of the alternative of taking state-by-state reductions and the constant complaints of inequity among the states' regulations that result.

I have several additional reasons to not pursue the for-hire industry suggestion for a mode-specific 11" size limit to retain a 50-fish for-hire bonus season bag limit. While I'm supportive of carving out an alternative size limit for the shore mode, this is based on the truncated size availability of fish to these anglers. Conversely, the data show similar size distributions of harvested fish by for-hire vessels and private vessels. Three different size limits for scup would also add additional complexity to the regulations. Comment as to the negligible expected effect of such a size limit increase on harvest also gives me pause when proposed as an alternative to the bag limit reduction. Such logic seems to ignore the fact that these regulation changes are intended to reduce harvest; without doing so, we will likely be in the same situation again next year. These comments also remarked on the attraction to coming to MA for the large scup here. No state will have a possession limit greater than 40 fish in 2023, meaning MA can still offer the potential for taking home the largest cumulative weight of fish per trip.

I do, however, agree with the numerous comments that the scup commercial quota underutilization adds to the frustration with the recreational reductions. It is fortunate that these commercial underages have occurred in recent years as they have been used as rationale to avoid larger recreational cuts and provided a buffer against exceeding the acceptable biological catch due to recreational overages. A more direct approach would be to allow inter-sector quota transfers, as is part of the bluefish management plan. DMF will pursue this with ASMFC and MAFMC as a near-term action. We'll also plan differently for next year to engage with the public prior to developing the regional scup approach.

Black Sea Bass. The survey on the black sea bass options proved itself a valuable tool, especially this year with our consideration of a mode split. My impression as to the public sentiment about these options would have been quite different from reviewing just the scoping meeting and written comments. While the for-hire industry requested our consideration of a mode split and supported these options, the majority of private vessel anglers—who dominate this fishery—showed a strong objection to mode splits. Although the black sea bass fishery is economically important to the for-hire industry, I am not comfortable ignoring the will of the vast majority of constituents in this case when my sense is that there is an alternative option that all constituents can live with.

Additionally, my primary interest in considering a mode split this year was to offer a private angler season into the fall. This could not be done without a bag limit reduction and it is plain that the for-hire fleet puts the highest priority on the bag limit. However, the mode split options lacked support from the majority of the constituents they were meant to benefit. It seems that we may have reached a tipping point amongst most private anglers where the bag limit has now dropped too low to forgo more for a season extension, especially with the increasing costs associated with a fishing trip. This situation adds to my general wariness that mode splits come at the expense of pitting user groups against each other, a probable increase in non-compliance, and another challenge for law enforcement. The mode splits we contemplated that hold the for-hire fishery status quo also raise the

question of how a potential liberalization would be treated next year. Lastly, the MAFMC and ASMFC have initiated an amendment to consider recreational sector separation (as well as recreational catch accounting) for summer flounder, scup, black sea bass, and bluefish, so while I am not in favor of adopting a mode-split this year, I do expect much more discussion and deliberation on how we treat the different recreational modes in the coming year(s).

Moving on to other options, the for-hire fleet's near-unanimity in opposing anything less than a 4-fish bag limit leads me to withdraw Option 2 and 3 from consideration despite their being the second and third most preferred options overall. Option 4 was often the least popular options among the various constituencies, and I too prefer not adopting an option that shortens the season (in addition to creating a mode-split).

This leaves me with Option 1. In addition to being the most preferred option amongst recreational anglers fishing from private vessels, it was also preferred (in the survey) by anglers who primarily fish for-hire vessels. In general, a uniform 4 fish at a 16.5" size limit (and slight season extension) was perceived as fair, an adequate amount to take home and make the trip worth it, the easiest to follow and enforce, and the least amount of change from 2022. Our data, supported by comments, demonstrate the abundance of sea bass well over 16" and 16.5". For-hire comment generally did not give a reason for opposing Option 1, other than supporting Option 5 and 6 more. Also, while not final yet, I believe that Rhode Island and New York will also be going with options that move to a 16.5" size limit. It is however worth noting at this time that if future reductions are needed, I will view additional size limit increases with substantially more caution. Our ratio of kept-to-released fish reached an all-time low in 2022; further declines bring concerns with regards to angler satisfaction and discard mortality.

Enc
Attachment 1. Summary of Oral Comment from Scoping Meeting
Attachment 2. Written Comments
Attachment 3. Results Overview from Survey

Attachment 1.

Summary of Oral Comment Received During MA DMF March 13 Scoping Meeting on 2023 Recreational Scup and Black Sea Bass Measures

Attendance (excluding DMF and MEP staff): David Allain, Scott Steinback, Steven Schmitt, Ray Castano, Mike DeAnzeris, Luciano Mascari, Vincent Miragliotta, Alan Steinbach, Mel True, Joe Petner, Richard Wood, Rick Golden, Hannah Hart, Willy Hatch, Frank Perry, Joseph Diodati, Jack Creighton, Daniel Smith, Jeff Viamari, Tyler Macallister, Carl Bois, Christopher Clarke, Elaine Mandell, Eric Morrow, Keith Baker, Will Poston, Shawn Ozolins, Mike Delzingo, Phil Vescio, Steve Theberge, Jr., Caleb Cebula, and Vin McCarthy.

Summary of Comments

Dan Smith (for-hire): For BSB, support Option 5 or 6 to hold for-hire fleet status quo. For scup, oppose reduction in for-hire bonus season bag limit.

Rick Golden (for-hire), Stellwagen Bank Charter Boat Association: Support options that hold for-hire fishery status quo [Option 5 or 6]. For scup, request an option that would maintain for-hire bonus season bag at 50 fish at expense of an 11" for-hire size limit. See organization's written comment for more information.

Richard Wood (for-hire), Cape Cod Charter Boat Association: Support options that hold for-hire fishery status quo [Option 5 or 6]. See organization's written comment for more information. For scup, request an option that would maintain for-hire bonus season bag at 50 fish at expense of an 11" for-hire size limit. In addition, appreciate the survey for black sea bass and how all six options could be ranked; displeased that scup locked in with only one option without an earlier opportunity for public input.

Eric Morrow (for-hire): Glad to see options with mode-specific regulation as has been requested by for-hire industry for years. High bag limits for both species are essential to attracting clients, particularly those out of state who constitute his majority. For scup, opposed to the for-hire bonus season bag limit reduction; and would prefer a higher size limit instead since anglers come to MA for bigger sized fish. For BSB, support Option 6, to maintain for-hire and give private anglers a longer season.

Jeff Viamari (for-hire): Agree with Stellwagen Bank Charter Boat Association position; Option 6 for BSB. Glad to finally see options with a mode-split reflecting different needs.

Vin McCarthy (angler): For BSB, support Option 6.

Joe Petner (angler): For BSB, support Option 1. Recognize that for-hire is recreational but also a business, and while for-hire should have measures that enable staying in business, it should not come at the private anglers expense whose interests are no less important. Everyone can deal with a ½" size increase. Longer season not particularly important because doesn't fish in Sept/Oct.

Willy Hatch (for-hire): For scup, need the highest bag limits possible. For BSB, appreciate the mode-split options reflecting different priorities; for-hire needs 4 fish at a minimum all season. Support Option 5 or 6 for for-hire and think that private anglers would appreciate longer season.

Steve Theberge, Jr. (angler): For BSB, top three choices in order of preference are Option 6, Option 5, Option 1. Would like longer season to retain BSB while tautog fishing.

Refer to video record of scoping meeting for full comment:
https://www.youtube.com/watch?v=x-L5WD4ZCY4&t=1338s

From: Riding, Audra (SEN)
To: McKiernan, Dan (FWE)
Cc: Fish, Marine (FWE)
Subject: 2023 Black Sea Bass
Date: Wednesday, March 15, 2023 2:21:48 PM
Attachments: Outlook-a2ug4mx0.png
Montigny DMF 2023 Black Sea Bass Comments 3.15.23.pdf

Dear Director McKiernan,

I hope you are doing well.

On behalf of Senator Montigny, please accept the attached letter regarding the 2023 Black Sea Bass measures currently under consideration.

Thank you,

_____

Audra Riding, Esq.
General Counsel & Legislative Director
Office of Senator Mark Montigny
State House, Room 312-C
Boston, MA 02133
(617)722-1440

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The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

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SENATE COMMITTEE ON STEERING AND POLICY

Vice Chair
EXPORT DEVELOPMENT

SENATE COMMITTEE ON INTERGOVERNMENTAL AFFAIRS

March 15, 2023

Director Daniel J. McKiernan
Massachusetts Division of Marine Fisheries
251 Causeway Street, Suite 400
Boston, MA 02114

RE: Public Scoping on 2023 Recreational Scup and Black Sea Bass Measures

Dear Director McKiernan:

I am writing to express my concern regarding the Division's proposed 2023 Black Sea Bass measures. While local recreational fishermen understand the necessity of the mandatory ten percent harvest reduction, I have heard from private, not-for-hire fishermen that several proposed options will create inequity among similarly situated anglers.

Specifically, Options 4 through 6 would modify possession limits and open season dates for private, not-for-hire vessels while maintaining the status quo for anglers aboard for-hire vessels. For example, Option 4 would allow for-hire vessels a 4 fish limit while not-for-hire vessels would be limited to 3 fish. Additionally, Option 5 would allow for-hire vessels up to 4 fish while not-for-hire anglers would be limited to just 2 fish. Lastly, Option 6 would limit not-for-hire vessels to just 1 fish during the prime fishing season between July 1st and August 31st. Meanwhile, for-hire vessels could catch their entire 4 fish allotment if they desired to do so.

Without a compelling justification, these options would be unfair to recreational fishermen who simply enjoy being outdoors and fishing for fresh saltwater fish. These fishermen enjoy their time on the water, and they contribute to our local economy through the sales of fuel, bait, tackle, dockage fees, and other services. They deserve to be treated on an equal playing field as vessels available for-hire.

In closing, the Division should reject any option that would create inequity among recreational fishermen. Other options are available to meet our harvest reduction obligations without sacrificing a sense of fairness amongst all recreational anglers. I respectfully ask that you give these thoughts your utmost consideration.

Sincerely,

Mark Montigny
SENATOR

From: Glenn Verdini
To: Fish, Marine (FWE)
Subject: 2023 Marine Recreational regulations; Input into the Proposed Options
Date: Wednesday, March 15, 2023 7:36:01 PM

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Daniel McKiernan

Director- The Commonwealth of Massachusetts Division of Marine Fisheries

Dear Director McKiernan,

I am writing you as a patron of several charter, open and party boats which include black sea bass and scup as part of our target species and would like to provide my input into the proposed options for 2023 Marine Recreational regulations regarding black sea bass and scup.

For Black Sea Bass, my preferred option is Option 6, second is Option 4 and lastly Option 3.

For Scup, my preference would be an 11" minimum size for Scup on the For-Hire vessels and a 50 Fish bag limit from May1-Sept 4.

Thank you for your consideration of and the opportunity to provide my input.

Glenn Verdini

16 Carlstad Street

Worcester, MA 01607

From:	Barbara Rigby-Clark
To:	Fish, Marine (FWE); Barbara Rigby-Clark
Subject:	2023 Regulations for Seabass and Scup
Date:	Wednesday, March 15, 2023 8:41:51 PM

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To: Massachusetts Division of Marine Fisheries,
Director Daniel Mckiernan

My Friends (We) and I have enjoyed fishing in Massachusetts, for 35 years, beginning in May, of 1988. We have also enjoyed many of your For-Hire Fleets there to include currently The Bounty Hunter.

This being addressed, We (and I) **strongly support** the following:

Option five (5) or six (6) for Black seabass, the status quo from the last season.

A mode shift that will create a separate category for the For-Hire Fleet in Massachusetts.

We and I additionally support the 11" minimum size for Scup on the For-Hire vessels along with the fifty (50) fish bag limit
from May1 - September 4.

Greatly appreciate this opportunity to express my thoughts in this matter.

Barbara Rigby-Clark

From: Joanne Morrow
To: Fish, Marine (FWE)
Subject: Att: director Daniel McKiernan
Date: Wednesday, March 15, 2023 10:59:39 PM

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Mr. McKiernan : I frequent the “for hire” fleet in Massachusetts, particularly onboard the vessel “Bounty Hunter” in Fairhaven. Undoubtedly I fully support a mode shift which will create a separate category for “ForHire” vessel fleets. Also I support an 11” minimum size for Scup on the “For Hire” vessels AND a 50 fish bag limit from May 1st - September 4th. I have read over the table of proposed options and I Definitely Support Options 4, 5, 6.....With Strongest Emphasis of support on Option 6. Thank you for reading my supportive remarks.

.....Avid supporter of Massachusetts fishing, Jo Hlavac.

From: Paul Gadd
To: Fish, Marine (FWE)
Subject: Black sea base regs
Date: Wednesday, March 15, 2023 1:54:45 PM

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Mr Daniel Mckiernan

I was unable to join the online meeting Monday evening about the new Black Sea Base regulations but having looked at the proposed suggestions I think the best option for everyone involved is # 6 ,I have spoke with other fisherman and charter captains I know who also think this is the best option.

Thank you

Paul Gadd
Marlboro Ma

From: William Hatch
To: Meserve, Nichola (FWE); Michael Pierdinock; Ray Kane; Silva, Jared (FWE); Fish, Marine (FWE)
Subject: Black Sea bass and scup 2023
Date: Tuesday, March 14, 2023 10:51:17 AM

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Director McKiernan and Members of the Commission,

I am writing to provide input regarding the upcoming measures for black sea bass and scup for 2023 season. I attended the zoom public hearing last night and several points all seemed to be unanimous among the participants providing input.

The first is that both user groups, private anglers and for hire operator's, appreciate the ability that separation between the two sectors allows for flexibility that gives both user groups measures that best suit their needs. The private anglers have options that allow for a longer season with a lower bag limit. The for hire boats prefer a higher bag limit to make the trip worth taking. A large percentage of the bottom fishing clients come from the New York, New Jersey area and we need a decent bag limit to make the trip worth while. The price of travel and hotels etc has gone up dramatically and it is hard to attract customers with a low bag limit especially when their home state like New Jersey have 10,15 sea bass bag limits in the spring and fall.

Both groups would like a May 20th start date as this is the best fishing of the season and the fish are close and accessible. Many of the other recreational species have not shown up yet In Massachusetts.

I do not support an increase in the size limit. This will lead to more discard and also targeting and removal of just the large mature males in the population.

Another sentiment shared by the participants is that even though there is an extremely robust population of sea bass year after year we continue to endure cuts that negatively affect our businesses and fishing opportunities. After years of cuts and reductions it is hard to believe we are faced with even more cuts given the health of the stock. We all hope for sustainable populations of fish but also management measures that are realistic and fair.

The recreational survey that was sent out by the state is a great idea to get anglers preferences for how they would like their fishery managed. I would support either of the options that would provide the for hire boats 4 fish 16 inches May 20- sept 4 and recreational anglers the ability of a longer season with lower bag limit. I believe either option 5 or 6 would achieve this.

I am upset to hear of the scup cuts that will negatively affect the for hire boats. The handful of boats that fish for scup depend on a high bag limit to attract customers. One proposal might be to keep the bag limit the same as previous years would be to be able to transfer unused underutilized commercial quota to the recreational sector.

Thank you for your consideration ,
Willy Hatch
Machaca Charters

From: reeldeaded
To: Fish, Marine (FWE)
Subject: Black Sea Bass and Scup Measures
Date: Tuesday, March 7, 2023 3:25:39 PM

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Director McKiernan,

I am an avid recreational angler and Massachusetts resident. I fish from up off the Merrimack River down to Sow and Pigs. One of my favorite fishing activities is the spring black sea bass run. It's a great way to put fish on the plate and to get kids involved in the sport. I spent a lot of hours the past few years making memories with my kids and their friends. Based on my experience, I have some thoughts on both management at large and the particular proposals you set forth.

From a 10,000' view there is something rotten about the way we manage recreational fisheries. Your agency needs to put more pressure on the Federal government to stop mismanaging our public resource before we are only left with access to fish we can't catch. I recognize that recreationally catch is driven by availability, but the whole process seems completely divorced from the reality of what we see out on the water and contrary to stock assessments.

If I were in your seat, I would advocate for two things. First is a system when limits are put in place for a series of years and then management responds and reacts to harvest over a those three years in context of a stock assessment. This cut in response to good fishing conditions approach stinks. This would give more certainty to our for-hire businesses who are hurting from this management program and maybe lend some more credibility to the process by taking the yo-yo away from NOAA. Second, there should be more flexibility for states to transfer commercial quota to their recreationally fisheries. There is no commercial market for scup and we leave million(s) of pounds of quota on the table every year. The fish are absolutely everywhere to the point where they are an inconvenience. Let's give our recreational anglers access to some of those fish, it'd certainly be a huge benefit to many poor and fixed income folks throughout the state.

For scup, I only take a couple large scup a year that I catch with sea bass. This really doesn't impact me. I'm glad to see the proposal gives a break to the shore anglers. I'm also glad it cuts down on that spring for-hire meat fishery, but we all know their coolers will still be full with everything that comes up. I know a lot of for-hire guys who rely on it, but it's gross to witness. Pigs.

On black sea bass, I personally like Option 6 and Option 1. Option 6 lets me target them in the spring and keep a few keepers in the fall when I may catch them when I'm targeting tog. I don't charter, but I like that it keeps these guys in the same season. They need a break. However, I also like Option 1 because it lets me keep more fish in the spring when the fishing is consistently good. To that point, I'd really like Option 6 if there was a way to keep 4 fish in the spring and fewer fish in the fall. I don't need more than 1 or 2 on a good day. Difference in minimum size is inconsequential to me up to about 18 inches because I'm not keeping anything that isn't a jumbo.

Thanks,

Edward

Sent with Proton Mail secure email.

From: Harry Graff
To: Fish, Marine (FWE)
Subject: Black Sea Bass Option 1
Date: Wednesday, March 1, 2023 9:42:53 AM

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I support Option 1

--
Harry Graff
harry.graff3@gmail.com
C 508.326.9220

From: Tom
To: Fish, Marine (FWE)
Subject: black sea bass options
Date: Thursday, March 2, 2023 10:21:02 AM

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As a regular recreational fisherman for black sea bass, I prefer Option 1.

Option 3 would be my secondary preference.

James White
40 Shore Drive
Plymouth, MA 02360

From: Caleb Cebula
To: Fish, Marine (FWE)
Subject: Black Sea Bass proposals
Date: Monday, March 13, 2023 8:13:33 PM

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Good Evening Mr. McKiernan,

I am a captain for Bounty Hunter Charters. My father and grandfather were both commercial lobstermen, so therefore I have spent my entire life on the water. I want to reach out and express my appreciation for giving options that separate the for-hire fleet. I would vote in favor of Option 6.

Thank you for your time and consideration,

Caleb Cebula

From: dtokla
To: Fish, Marine (FWE)
Subject: Black sea bass public forum
Date: Friday, March 3, 2023 8:24:08 AM

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Thank you for seeking public input on this matter.

As a lifelong Cape Cod resident I feel that option one should be the correct choice for this fishery.

I understand the importance of conservation and preservation of our ocean species. I would like to add that putting a different limit for for hire / recreational anglers creates animosity towards each group.

If it is truly about preservation of these species the limits should be the same across-the-board. When you look at the amount of recreational anglers and the money we spend on purchasing boats, maintaining boats, storage fees etc. I feel and some studies have shown that we put as much if not more money into the local economy than the for hire vessels.

Thank you for seeking input on this topic

Cheers

Sent from my T-Mobile 5G Device

From: Larry Perrault
To: Fish, Marine (FWE)
Subject: Black Sea Bass Reduction
Date: Sunday, March 5, 2023 8:08:57 AM

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I'm in favor of Option 2 on the listing of proposed changes to the Black Sea Bass season for 2023. I'm a recreational fisher and I feel that 3 fish is an adequate number for the average family and shortening the season by 5 days is not a hardship. Certainly it is a good idea to preserve this fishery for the future.

I fish mostly the Buzzards Bay Area for Black Sea Bass and in my opinion more enforcement would be welcomed by many fishers that obey the laws. There are the unpleasant few that land everything that is caught regardless of species or size. That would also help to preserve the fishery.

Thank you,

Larry

Sent from my iPad

From: Lach, Jordan
To: Fish, Marine (FWE)
Subject: Black Sea Bass Selection
Date: Sunday, March 5, 2023 10:37:11 AM

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To whom it may concern,

As I am unable to attend the virtual meeting on March 13th, I would like to strongly suggest that we go with Option 1, increasing the Black Sea bass size to 16.5”, keeping the possession limit of 4 fish and the season to be May 20th-September 7th.

Thank you.

From: Victor Yarra
To: Fish, Marine (FWE)
Subject: Black Sea Bass
Date: Friday, March 10, 2023 11:41:07 AM

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I am writing this to express my support for option #6 for the upcoming sea bass regulations. As a part time angler and trailering a boat from a distance it gives guys like me a better reason to purchase the permit a easier to swallow fuel costs. Thank you for my consideration.

Victor Yarra
Western Mass

Sent from Yahoo Mail for iPhone

From: Will Geresy
To: Fish, Marine (FWE)
Subject: Black Sea Bass
Date: Wednesday, March 1, 2023 7:28:14 PM

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As a recreational fisher I prefer option 5.

Closing the season for us in early September ruled out our best time to fish after the crowds of transient boaters left our area for the season at Labor Day.

From: ksimondd
To: Fish, Marine (FWE)
Subject: Black Sea Bass
Date: Monday, March 13, 2023 9:14:05 AM

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Please consider approving Option 6 for the upcoming season. There will be no bookings if the bag limit is cut beyond that. With the abundance of BSB in our waters there must not be a cut to the for hire fleet below 4 per person or there will be no BSB charters and therefore no Massachusetts charter businesses for that fishery

Thank you,
Kevin

--
Kevin Simon
508-769-8356

From: Rodney Walker
To: Fish, Marine (FWE)
Subject: Black Seabass and Scup
Date: Wednesday, March 15, 2023 11:26:01 PM

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I fish on the boat (Bounty Hunters) and strongly support the regulations 4 and 5,mainly 6.
I understand the need to preserve these fish and their reproduction as I also understand that we're all trying to feed our families.

From: John Dvorski
To: Fish, Marine (FWE)
Subject: Black Seabass Regulations
Date: Tuesday, February 28, 2023 5:36:51 PM

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Mr. McKiernan,
I am a recreational fisherman who loves to fish for all the different species of ground fish including Black Seabass. Any changes made to the daily quotas will have no impact as long as there is no one out checking fisherman on how many fish and what size they are landing. We need enforcement where the fish are being caught. I see people all the time taking undersized fish. Quantities are harder to judge but if they are disregarding size rules you can bet they are also disregarding quantities. I have never had law enforcement officers check my fish but would welcome this. Please get officers involved.
Regards,
John Dvorski

Sent from my iPhone

From: kitspitt
To: Fish, Marine (FWE)
Subject: Bounty Hunter Fishing Fleet
Date: Wednesday, March 15, 2023 5:37:34 PM

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Good afternoon
I frequent the Bounty Hunter Fishing Fleet regularly. It is a wonderful boat. And I strongly support the for-hire option #5 and #6 for Black Fish for May 1, 2023 thru September 4, 2023.

Also support 50 per man scup for the for-hire fleet for the dates of May 1, 2023-September 1, 2023.

I'm am looking forward to a great season this year.

That you
Die hard fishing customer
Randy Williams

Sent from my iPhone

Sent from my iPhone

From: Mark Petitt
To: Fish, Marine (FWE)
Subject: BS/Scup
Date: Tuesday, March 14, 2023 10:06:04 AM
Attachments: 031423 Final BSB SCUP LTR.pdf

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I could not write this better myself.
I completely agree with this recommendation.
Thank you

Mark Petitt
Plymouth
Charters & Cruises Inc.
508-326-3185

39 Industrial Park Road, Unit C
Plymouth, MA 02360
www.stellwagenbank.org

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Capt. Robert Savino

Capt. John Richardson

March 14, 2023

Mr. Daniel J. McKiernan, Director
Commonwealth of Massachusetts
Division of Marine Fisheries
251 Causeway St., Suite 400
Boston, Massachusetts 02114

RE: Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023

Dear Mr. McKiernan:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA), representing charter/party boat captains and recreational anglers that fish the north and south shore, Cape and the Islands and the south coast, below are the following comments associated with the black sea bass and scup seasons and bag limits for 2023.

- The proposed 10% recreational harvest reduction to both species continues to be inconsistent with our observations with the tremendous biomass of both species observed in our waters. We appreciate the fact and understand that the reduction could have been worse if the Management Strategy Evaluation, Harvest Control Rule was not implemented but there is still a significant disconnect with our observations on the water and our subsequent seasons and bag limits.
- The SBCBA has recommended for many years now separate seasons and bag limits for the for hire fleet for black sea bass. This recognizes the fact that the for hire fleet needs to operate a financially viable business as well as provide a mechanism for the public to be provided access to the fishery.
- The for hire fleet is the bus providing recreational anglers access to the fishery that would not be possible for those that do not have the time to learn to or fish from the shore or from a vessel nor have the economic ability to own and operate their own vessel. As a result, the public will not book a for hire trip if the price does not reflect a reasonable bag limit. If such is the case the public will not book a trip in turn not providing the public access to the fishery. With the increased cost of fuel, boat expenses, tackle etc., the for hire fleet

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Plymouth, MA 02360
www.stellwagenbank.org

is a timely and cost effective means for the recreational community to have access to the fishery.

- The for hire fleet cannot go below a black sea bass bag limit of 4 or there will be no bookings, we made this clear last year when such was proposed.
- Consistent with the reasons set forth above, the SBCBA recommends those options with a black sea bass for hire 4 fish limits at 16 inches over the timeline specified, May 20 through September 4th.
- The SBCBA proposes a for hire measure for scup with an increase to 11 inches with a 50 fish limit from May 1 through Sept 4th to maintain bookings. We are concerned that clients with a 30 fish limit will pursue other options elsewhere and will not book a trip.

If you have any questions or comments, please contact us at the emails below.

Very truly yours,

Capt Rick Golden

Capt. Rick Golden
SBCBA, Secretary
sbcbaofficers@gmail.com

Capt. William Hatch

Capt. William Hatch
SBCBA, Board of Directors
machacafishing@gmail.com

Capt Mike Delzingo

Capt. Mike Delzingo
SBCBA, Board of Directors
ff_boston@yahoo.com

Capt. Eric Morrow

Capt. Eric Morrow
SBCBA, Board of Directors
capteric@fishbountyhunter.com

Capt Paul Diggins

Capt. Paul Diggins
SBCBA, Trustee
captain_paul@bostonfishing.com

Capt Rob Savino

Capt. Rob Savino
SBCBA, Trustee
crobsaviino@mac.com

39 Industrial Park Road, Unit C
Plymouth, MA 02360
www.stellwagenbank.org

Capt Damon Saco

Capt. Damon Saco
SBCBA, Board of Directors
captdamon@gmail.com

cc: Ron Amidon, MassF&G
Michael Pentony, GARFO
Barry Gibson, RFA

From:	John Richardson
To:	Fish, Marine (FWE)
Subject:	Comment on Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023
Date:	Tuesday, March 14, 2023 5:18:57 PM

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Captain John Richardson

95 Clifton Ave, Hull, MA 02045

cell (781) 718-0306 ~ office (781) 749-2209

je.richardson.builder@gmail.com

March 14, 2023

Mr. Daniel J. McKiernan, Director

Commonwealth of Massachusetts

Division of Marine Fisheries

251 Causeway St., Suite 400

Boston, Massachusetts 02114

RE: Comment on Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023

Dear Mr. McKiernan:

Although I understand that a 10% reduction in recreational harvest of Black Sea Bass is not a decision of DMV, I would like to record that I have experienced a very high level of Black Sea Bass population in coastal waters of Massachusetts, indicating a need to regulate their catch on a northern and southern range basis.

Even though I am in favor of separate bag for For-hire vessels in most fisheries, I believe combining a proposal to reduce the recreational catch to 1 fish for the entire summer with the Option 6 separate For-hire bag limit proposal was a mistake.

I support Option 2 as the proposal that causes the least impact on the fishery.

Very truly yours,

John Richardson

From:	SBCBA Secretary
To:	Fish, Marine (FWE)
Cc:	Meserve, Nichola (FWE); ron.amidon@mass.gov; Michael Pentony; Barrygibson; russell.dunn@noaa.gov; McKiernan, Dan (FWE)
Subject:	Comments to Black Sea Bass & Scup 2023 Measures
Date:	Monday, March 13, 2023 8:46:02 AM
Attachments:	image.png 031423 Final BSB SCUP LTR.pdf

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Mr. McKiernan:

On behalf of the SBCBA, attached are comments and recommendations to the proposed black sea bass and scup measures for 2023. Details associated with the recommendations are set forth in the correspondence attached, in summary:

- The SBCBA recommends those options with a black sea bass for hire 4 fish limits at 16 inches over the timeline specified, May 20 through September 4th.

- In addition, the SBCBA proposes a for hire measure for scup with an increase to 11 inches with a 50 fish limit from May 1 through Sept 4th.

If you have any questions or comments please reach out via email.

Please confirm receipt of this email.

Thanks

Capt. Rick Golden

Secretary of SBCBA

Stellwagen Bank Charter Boat Association
39 Industrial Park Road, Unit C
Plymouth, MA 02360
www.stellwagenbank.org

The Stellwagen Bank Charter Boat Association is a 501(c)(6) non-profit organization within the charter boat industry, created to provide a forum for members in the for-hire sport fishing industry; to provide a unified voice to preserve and protect the rights, traditions and

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Capt. Peter Murphy

Capt. Brian Curry

Capt. Robert Savino

Capt. John Richardson

March 14, 2023

Mr. Daniel J. McKiernan, Director
Commonwealth of Massachusetts
Division of Marine Fisheries
251 Causeway St., Suite 400
Boston, Massachusetts 02114

RE: Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023

Dear Mr. McKiernan:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA), representing charter/party boat captains and recreational anglers that fish the north and south shore, Cape and the Islands and the south coast, below are the following comments associated with the black sea bass and scup seasons and bag limits for 2023.

- The proposed 10% recreational harvest reduction to both species continues to be inconsistent with our observations with the tremendous biomass of both species observed in our waters. We appreciate the fact and understand that the reduction could have been worse if the Management Strategy Evaluation, Harvest Control Rule was not implemented but there is still a significant disconnect with our observations on the water and our subsequent seasons and bag limits.
- The SBCBA has recommended for many years now separate seasons and bag limits for the for hire fleet for black sea bass. This recognizes the fact that the for hire fleet needs to operate a financially viable business as well as provide a mechanism for the public to be provided access to the fishery.
- The for hire fleet is the bus providing recreational anglers access to the fishery that would not be possible for those that do not have the time to learn to or fish from the shore or from a vessel nor have the economic ability to own and operate their own vessel. As a result, the public will not book a for hire trip if the price does not reflect a reasonable bag limit. If such is the case the public will not book a trip in turn not providing the public access to the fishery. With the increased cost of fuel, boat expenses, tackle etc., the for hire fleet

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is a timely and cost effective means for the recreational community to have access to the fishery.

- The for hire fleet cannot go below a black sea bass bag limit of 4 or there will be no bookings, we made this clear last year when such was proposed.
- Consistent with the reasons set forth above, the SBCBA recommends those options with a black sea bass for hire 4 fish limits at 16 inches over the timeline specified, May 20 through September 4th.
- The SBCBA proposes a for hire measure for scup with an increase to 11 inches with a 50 fish limit from May 1 through Sept 4th to maintain bookings. We are concerned that clients with a 30 fish limit will pursue other options elsewhere and will not book a trip.

If you have any questions or comments, please contact us at the emails below.

Very truly yours,

Capt Rick Golden

Capt. Rick Golden
SBCBA, Secretary
sbcbaofficers@gmail.com

Capt. William Hatch

Capt. William Hatch
SBCBA, Board of Directors
machacafishing@gmail.com

Capt Mike Delzingo

Capt. Mike Delzingo
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ff_boston@yahoo.com

Capt. Eric Morrow

Capt. Eric Morrow
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Capt Paul Diggins

Capt. Paul Diggins
SBCBA, Trustee
captain_paul@bostonfishing.com

Capt Rob Savino

Capt. Rob Savino
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crobsaviino@mac.com

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Capt Damon Saco

Capt. Damon Saco
SBCBA, Board of Directors
captdamon@gmail.com

cc: Ron Amidon, MassF&G
Michael Pentony, GARFO
Barry Gibson, RFA

future of saltwater fishing; to provide education to members concerning fishery regulations, fishing techniques, better business practices and vessel compliance and safety requirements; to promote sport fishing and collaboration among members; to promote marine conservation, advancement of science, education and sustainable fishery management practices.

From: Ralph Eugene
To: Fish, Marine (FWE)
Subject: Daniel McKiernan
Date: Wednesday, March 15, 2023 9:51:15 PM

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Hello Director McKiernan,

I am writing today as a frequent For-Hire vessel participant and an ex-at-sea-monitor to inform you about the pending MA DMF 2023 REGULATIONS FOR SEABASS & SCUP I support. I support the 11" minimum size for Scup on the For-Hire vessels and a 50 Fish bag limit from May 1-Sept 4. I also support options 4, 5, and 6, with greater emphasis on option 6.

Thank you,

Ralph Eugene

From: jay
To: Fish, Marine (FWE)
Subject: Fishing
Date: Monday, March 13, 2023 1:35:32 AM

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Stop the draggers. Whoever makes these adjustments needs to go on a draggers boat for a week. Its ruining fishing for people that want to go out and enjoy their boat and catch some family dinner. It cost a fortune to have a boat and gas to get to these fishing stops to come in with just a few fish to eat and freeze.
Hopefully you take some trips out on boats and see what it's like to come in with 3 sea bass after 80 in fuel and hour each way . Go back to 5 fish.

Sent from Yahoo Mail on Android

From: alwaysindia@aol.com
To: Fish, Marine (FWE)
Subject: Fishing
Date: Wednesday, March 15, 2023 11:11:56 PM

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Dear Mr. Daniel McKiernan,

I Cynthia Shephard frequent the Bounty Hunter. The for hire fleet in MA. I fully support a mode shift that will create a separate category for the For-Hire Fleet. I also support an 11 inch minimum size for scup on the For-Hire vesseles and a 50 fish limit from May 1st - Sept 4th. I also support options 4,5 and 6, especially 6

Thank you

From: Carlton Hudson
To: Fish, Marine (FWE)
Subject: For hire
Date: Wednesday, March 15, 2023 7:30:53 PM

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I would like to opt for options #4, #5 and #6

Another Furious Creation!

From: Meserve, Nichola (FWE)
To: Fish, Marine (FWE)
Subject: FW: Black Bass Scoping
Date: Tuesday, March 14, 2023 1:46:58 PM

-----Original Message-----
From: David Sullivan <repdbs53@comcast.net>
Sent: Tuesday, March 14, 2023 10:57 AM
To: Meserve, Nichola (FWE) <nichola.meserve@mass.gov>
Subject: Black Bass Scoping

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Nichola,
It just seems that restrictions on game fish keep falling on sportsmen (sportswomen), when the reality is problems are coming from the commercial side. I'm all for accountability and monitoring on all. Thousands of stripers are dumped dead or to die out in deep water. That damage is not done by recreational sport fishing. I understand how lobbyist can prevent effective measures to protect species having served in the legislature. However it's time to regulate the true source of the problems. While serving I always supported your agency please do the right thing when establishing new regulations and don't punish those who are not the problem.
David B. Sullivan
Thankyou for your consideration!

Sent from my iPhone

From: McKiernan, Dan (FWE)
To: Silva, Jared (FWE); Meserve, Nichola (FWE)
Subject: FW: Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023
Date: Monday, March 13, 2023 8:43:13 AM

From: Rich Wood <CaptainRichWood@comcast.net>
Sent: Sunday, March 12, 2023 4:14 PM
To: McKiernan, Dan (FWE) <dan.mckiernan@mass.gov>
Subject: Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023

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March 14, 2023

Mr. Daniel J. McKiernan Director Commonwealth of Massachusetts Division of Marine Fisheries
251 Causeway St., Suite 400 Boston, Massachusetts 02114

RE: Proposed Black Sea Bass & Scup Seasons & Bag Limits 2023

Dear Mr. McKiernan:

I am writing you on behalf of the Cape Cod Charter Boat Association (CCCBA), and its over 75 active and retired Charter boat captain/members.

- What must be said right from the get go, the observations of our membership relative to quantities of these species seen in our waters is vastly inconsistent with the data being used by those parties proposing the 10% recreational harvest reduction to both species. This statement in no way is meant to discredit those individuals, but is, again, bringing forth the fact that in most situations involving tightening of regulations the hands-on observations differs dramatically from the researchers, scientists, etc.etc. We don't have an easy answer to this seemingly continuous mis-match of viewpoints, but we are more than willing to brainstorm options. Perhaps representatives of a few user groups could be invited to personally participate in up-front actual work discussions/meetings to lend their first hand experiences.

- We are heartened to see the recommendation for separate seasons and bag limits for the for hire fleet for black sea bass. While we all want access to this fishery, for hire as well as individual recreational anglers, the main difference is the for hire fleet needs to be recognized for what it is, a business supporting not only the captain and crew, but also their families. Recreational fishers fish for pleasure, and maybe some food on the table. For hire fishers fish for their livelihood.

- In reviewing the various options presented, in our opinion the two variables which are

the most important to the for hire fleet are bag limit as well as length of season. Not to sound too dramatic, but it is extremely critical the current bag limit remain at four. With fuel prices still not down to pre-COVID levels, dockage fees increasing, and inflation at 6% plus, we have struggled to maintain our price structures. And our customers, who are also fighting fuel increases and the impact of inflation upon their mortgages and lives, are struggling to save away "just enough" to take their families fishing. The current four fish bag limit seems to have kept a balance, but we are extremely worried a bag limit of anything less will cause our customer base to collapse. Length of season is extremely important as well. With weather cancellations, etc., even "one more day" out on the water with customers can add to our Captains paying for that winter fuel bill or needed vessel repairs.

- In conclusion, for the reasons cited above, of the options available to us at this time the CCCBA is supportive of Option 6, for hire, 16", 4 fish bag limit, and a May 20 - Sept.4 season.

Please contact me should you have any questions or would like to discuss further.

Respectfully,

Captain Richard Wood
President, CCCBA
Beth Ann Charters
CaptainRichWood@comcast.net
860-716-0202

From: Ralph True
To: Fish, Marine (FWE)
Subject: Fwd: Picture
Date: Monday, March 13, 2023 10:40:57 AM

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Cutting seabass quotas is outrageous. The huge population of sea bass is there for everyone, not just commercial boats . Every year I watch senseless waste of this valuable resource by commercial boats discarding dead seabass into our ocean waters . It is not only seabass. A few years ago my fishing buddy and I also watched commercial boats throwing stripers overboard ? We need to clean up this mess and stop the waste . The recreational angler is a senseless target for these outrageous practices by commercial boats . These kids deserve better .
Take A Kid Fishing & Keep Them Rods Bending !

Ralph True Sr . Outdoor Writer for more than 40 years !!

---------- Forwarded message ---------
From: **Ralph True** <ralph.true@icloud.com>
Date: Sun, Mar 12, 2023 at 6:46 PM
Subject: Picture
To: <oldsalt.rts@gmail.com>

Sent from my iPhone

From: Rich Antonino
To: Fish, Marine (FWE)
Subject: Hi Dan
Date: Wednesday, March 1, 2023 12:30:54 PM

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I don't know how to express my dissatisfaction with fisheries regulations with enough vehemence that I feel my concerns will really be considered. (And not so vehemently that I get boarded 14 times in a summer, again).

So I'll be nice. As we are all quite aware, MRIP counts fish and miscounts are held against the anglers, as we see with a "10% reduction" because of "too much catch" and not because "the fisheries are hurting".

This is my problem. I think we can all agree that the sea bass population is not in any trouble. But instead of throwing our hands up with miscounts of the past and saying "ok, starting now, the regulations should be X based on populations of fish", we are hammering the fishermen. It is costing me a lot of money and making it difficult to attract customers.

When the bag limit was 8 fish per person, I was booked every day, two trips a day for the whole spring season for sea bass. At 5 fish I lost 40% of my trips. At 4 fish i went into survival mode and people stopped coming to Mass for sea bass.

As you know from the numbers of fish caught, it is the spring bite that brings people here for sea bass. The bite is better now than it was when the limit was 8 fish per person. Once we are in the summer and fall, other species are around and we think of sea bass as a delicious by catch.

While fishing for striped bass or fluke, it is nice to put a few sea bass in the cooler for customers. The fish are delicious, very plentiful, and letting them go seems arbitrary at best. Being able to keep fish for customers is what makes people spend money on charters. For this reason, I believe that the for-hire fleet should have an extended season to compliment our other fisheries.

And scup? Please. There is a biomass of scup that is not in any harm from overfishing. I hate being punished for "accounting errors" in the way fish are tabulated.

Thank you for your time; I hope to see an increase in the bay limit during the spring seasons and an extension into the fall for a few "by-catch" sea bass

Sincerely, Capt Rich AntonIno
Black Rose Fishing Charters
Plymouth, Mass.
--
Capt. Rich Antonino
Black Rose Fishing Charters
508-269-1882

www.blackrosefishing.com

From: Kevin Durfee
To: Fish, Marine (FWE)
Subject: Input on proposed Scup/Black Sea Bass changes
Date: Tuesday, February 28, 2023 4:56:24 PM

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Good afternoon
I'm a recreational fisherman living on Cape Cod.
I'm impartial to the proposed changes to the Scup regulations as I don't fish for that species.
However, I prefer option 3 for the Black Sea Bass changes, reducing the limit to 3 fish and keeping the minimum size at 16".

Thanks,
Kevin Durfee
178 Walton Heath Way
Mashpee, MA 02649

From: Jemal Mosley
To: Fish, Marine (FWE)
Date: Wednesday, March 15, 2023 6:32:16 PM

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Mr. Daniel McKiernan,

I am a frequent user of the Bounty Hunter fishing charter and I would greatly appreciate if you and your colleagues would truly consider allowing 11" for the minimum size for Scup for the For-Hire vessels and a 50 fish bag please. I will also like to include please consider a separate category such as option 5 or 6 for Black Seabass. Thank you for your time and consideration in this matter.

--
Keep God First, In Everything!

Jemal Mosley

From: Stephon Long
To: Fish, Marine (FWE)
Date: Wednesday, March 15, 2023 5:12:55 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good evening Director Daniel McKeirnan. My name is Stephon Long and I frequent the Bounty Hunter Charter for-hire. I fully support a mode shift that will create a separate category for the For- Hire Fleet. In addition, I support the 11" minimum size for scup on the For- Hire vessels as well as the 50 Fish Bag limit from May 1st- Sept 4th. Thank you for your time.

From: dan feeney
To: Fish, Marine (FWE)
Subject: Marine fisheries management practices
Date: Friday, March 10, 2023 2:02:29 PM

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It is a completely unfair practice to keep the present regulations in most if not all of our species without a complete reevaluation of the distribution of resources between the commercial and recreational fisheries.
First consideration should go to the sustainability of each followed by a fair distribution of excess or harvestable fish to the recreational fishermen. Any excess beyond that should be allocated to commercial interests. Special considerations like no circle hooks and allowance for commercial interests to harvest all the large striped bass are as corrupt as anything i have ever heard of.
The idea that you close black sea bass recreationally in early September then open up a huge commercial season shows us that your organization is not capable of managing our fisheries in an equitable manner.
Now you are going to cut the recreational black sea bass by 10%? Why don't you eliminate the late fall commercial season entirely and give all that excess
To recreational fishermen over the entire summer?
How stupid do you actually think we are?
It shall be my goal to educate and organize a fisheries rebellion to oust any of you that fail to
Face this issue fairly. Be aware that change is coming.

Unfortunately we need to save our resources- from you.

Sent from my iPhone

From: WILLIAM G LACH
To: Fish, Marine (FWE)
Subject: proposed black sea bass
Date: Saturday, March 4, 2023 4:19:56 PM

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Hi, I would propose option 1. increasing size limit to 16.5 inches.

Also has anyone looked at what the Sea bass is doing to the lobster populations. They love to eat small baby lobster, caught many with small lobsters in their throat or stomach. It was about 8 years ago that the sea bass exploded in Southeastern Ma and this last summer the lobster population has crashed.(takes about 8 years for a small lobster to reach legal size) These fish eat just about anything that moves. If we keep protecting these fish they will be the only ones left since they will eat all the smaller fry of local fish.

Bill Lach
86 Burt St
Norton, Ma

From: patriottoo@aol.com
To: Fish, Marine (FWE)
Subject: Proposed Recreational Measures for Sea Bass and Scup
Date: Tuesday, March 7, 2023 11:05:25 AM

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To whom it may concern:

After studying the options for the recreational measures to reduce the harvest of black sea bass and scup by 10% I prefer Option 5. For my business that is the option that would be the least painful.

Just as an aside, I often wonder when we will ever be able to relax these regulations. In my experience, there are more bigger fish than ever. In the last forty years we have not seen a reduction of conservation measures and we have never achieved any relaxing of these measures. I wonder at what point we might be allowed to catch the fish that we have so successfully protected and have seen an increase in the biomass by at least double?

Regards,

Capt. Jim Tietje

From: caleb slater
To: Fish, Marine (FWE)
Subject: Public Scoping on 2023 Recreational Scup and Black Sea Bass Measures
Date: Thursday, March 9, 2023 11:45:58 AM

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I am a Massachusetts resident, boat owner, and frequent recreational fisherman. I support option 1 (4 fish at 16.5") for Black Sea Bass.

Thanks,

Caleb Slater
Northbridge and Menemsha, MA

From: Jack
To: Fish, Marine (FWE)
Subject: Public Scoping on 2023 Recreational Scup and Black Sea Bass Measures
Date: Monday, March 6, 2023 12:42:29 PM

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"Dear Director McKiernan, I would like to see Option 1 (All Vessels) implemented for 2023 for Black Sea Bass: Size limit 16.5"/Possession Limit: 4 fish/day/angler. BSB season: 5/20/23 - 9/7/23.
Thank you"

Jack Pesa

From: Alan Davis
To: Fish, Marine (FWE)
Subject: Public Scoping on 2023 Recreational Scup and Black Sea Bass Measures
Date: Wednesday, March 1, 2023 11:02:26 AM

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My preference would be Option 1 as a recreational fisherman.
thank you,
Alan Davis

Sent from AOL on Android

From: Eddy Jimenez
To: Fish, Marine (FWE)
Subject: Public Scoping on 2023 Recreational Scup and Black Sea Bass Measures
Date: Wednesday, March 15, 2023 6:01:08 PM

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Hello Daniel McKiernan,

I frequent the For Hire Fleet in MA, Bounty Hunter. I full support a mode shift that will create a separate category for the For Hire Fleet. I support an 11" minimum size for Scup on the For Hire vessels and 50 Fish bag limit from May 1-Sept 4.
I support Option 6.

Thanks,

Eddy Jimenez
ejimenez3333@gmail.com

From: Paul Hume
To: Fish, Marine (FWE)
Subject: Quota
Date: Wednesday, March 15, 2023 5:10:13 PM

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I fish charter boats Mass- Rhode Island and Connecticut. I can accept 5-6 seabass and 50 porgies 11 inches.

Paul Hume

Sent via the Samsung Galaxy S9, an AT&T 5G Evolution capable smartphone

From: Neil Lettenberger
To: Fish, Marine (FWE)
Subject: RE Public Scoping on 2023 Recreational Scup and Black Sea Bass Measures
Date: Tuesday, February 28, 2023 5:35:54 PM

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Hi Daniel,

The new Scup options are not available yet but I don't harvest them and have no constructive input there.

Regarding Black Sea Bass, I'll offer the input that all the folks in my fishing circles don't keep anything under 18" -- a 16" or 16.5" fish barely yields a fillet -- so my preference is Option 1 where the min. length is increased. While you're at it, please increase it to 17" so you don't have to do another emergency change next year.

Kind Regards,
Neil Lettenberger

From: Rich Antonino
To: Fish, Marine (FWE)
Subject: Re: Hi Dan
Date: Thursday, March 2, 2023 4:49:10 PM

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And one more clarification….if there is one choice to be made from the 6 choices, and that's the only option for my suggestion, despite what i previously said: my voice is for Option 6. Thank you. Captain Richard AntonIno

On Wed, Mar 1, 2023 at 12:30 PM Rich Antonino <captain@blackrosefishing.com> wrote:

> I don't know how to express my dissatisfaction with fisheries regulations with enough vehemence that I feel my concerns will really be considered. (And not so vehemently that I get boarded 14 times in a summer, again).
>
> So I'll be nice. As we are all quite aware, MRIP counts fish and miscounts are held against the anglers, as we see with a "10% reduction" because of "too much catch" and not because "the fisheries are hurting".
>
> This is my problem. I think we can all agree that the sea bass population is not in any trouble. But instead of throwing our hands up with miscounts of the past and saying "ok, starting now, the regulations should be X based on populations of fish", we are hammering the fishermen. It is costing me a lot of money and making it difficult to attract customers.
>
> When the bag limit was 8 fish per person, I was booked every day, two trips a day for the whole spring season for sea bass. At 5 fish I lost 40% of my trips. At 4 fish i went into survival mode and people stopped coming to Mass for sea bass.
>
> As you know from the numbers of fish caught, it is the spring bite that brings people here for sea bass. The bite is better now than it was when the limit was 8 fish per person. Once we are in the summer and fall, other species are around and we think of sea bass as a delicious by catch.
>
> While fishing for striped bass or fluke, it is nice to put a few sea bass in the cooler for customers. The fish are delicious, very plentiful, and letting them go seems arbitrary at best. Being able to keep fish for customers is what makes people spend money on charters. For this reason, I believe that the for-hire fleet should have an extended season to compliment our other fisheries.
>
> And scup? Please. There is a biomass of scup that is not in any harm from overfishing. I hate being punished for "accounting errors" in the way fish are tabulated.
>
> Thank you for your time; I hope to see an increase in the bay limit during the spring seasons and an extension into the fall for a few "by-catch" sea bass
>
> Sincerely, Capt Rich AntonIno
> Black Rose Fishing Charters

> Plymouth, Mass.
> --
> Capt. Rich Antonino
> Black Rose Fishing Charters
> 508-269-1882
> www.blackrosefishing.com

--
Capt. Rich Antonino
Black Rose Fishing Charters
508-269-1882
www.blackrosefishing.com

From: josh_town@comcast.net
To: Fish, Marine (FWE)
Subject: Recreational Scup and C- Bass
Date: Thursday, March 9, 2023 11:12:49 AM

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Hello Dan, this is Joe Towns F/V Deana Marie home port Packet Landing, Bass River. The regulations last year hurt business considerably. Dropping to 4 c-bass was a killer. People just can't justify coming up here for two days fishing from Philly, the Carolinas and everywhere in between to catch four fish, and know with more regs it's just not sustainable. There is no question that my charter business will suffer badly and I will be sadly headed out of business. The 16 inch C-bass is not a problem, people are use to it and there are PLENTY of c-bass for the catching. There really isn't a shortage of c-bass or scup, I don\t understand how this is figured out. I would like to see at least 5 c-bass limit (and really should be more) and 50 scup. I think the minimum size on scup should be 11 or 12 inches. My scup gauge has been at 11 for years, anything less is just a very small fish. We need HELP Dan, the charter business for scup and c-bass will be gone with the continued raising of the minimum size and lowering of the possession limit. The fishermen in Massachusetts seem to always be on the short end. I think we always have bigger and more fish in our area but always pay the bigger price in conservation which is fine, but we never seem to be able to reap any of the benefits.

Thanks for your time Dan, Joe Towns

From: dlucianisr@yahoo.com
To: Fish, Marine (FWE)
Subject: Scup and Sea Bass reduction
Date: Monday, March 6, 2023 1:46:18 PM

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Dear Daniel McKiernan
It seems that the for hire and the individuals fishing on the shore and from their boats are always impacted by these changes yet i look at all of the tonnage of the commercial fisherman increase or do not get reduced like we do. I see all of the waste fish that are being recorded are not measured to see if they comply to the limits. I know that the fishing industry needs help but i feel that we all should have to support the environment and the fish population decrease. How many of the fish that are caught in the nets from commercial fishing are striped bass that are not the slot size that are kept. When i release a short or oversized striped bass i take care in making sure that they are released safely and able to survive maybe to be caught in the nets of the commercial fleet. I would hope that if the reduction for the scup and sea bass happens then it should happen to commercial fishing as well.
Respectfully,
Don Luciani

From: Bill Henault
To: Fish, Marine (FWE)
Subject: scup and sea bass
Date: Wednesday, March 1, 2023 8:54:31 PM

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the scup i can understand no one person needs that many fish,but sea bass is already low..you guys are slowly taking away all rec..fishermens catches .1st cod then stripers then tog then fluke and blackbacks now scup and sea bass but the commercial guys take take take..get rid of trollers and long lines ,and netters let the rec. people who like to feed there familys once in awhile be..we are the ones who spend money on poles,line,lures,weights,bait,ect..we put money back into the community not the commercial guys.keep taking it away and people wont be spending as much..just my view

From: Elaine Mandell
To: Fish, Marine (FWE)
Subject: Sea bass options
Date: Monday, March 13, 2023 8:11:56 PM

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Sent from my iPad
I vote option 1

From: Damon
To: Fish, Marine (FWE)
Subject: Sea bass regulations
Date: Monday, March 13, 2023 9:00:17 PM

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To whom it may concern

I am a 30 year Cape Cod charter captain ...I vote for black sea bass 4 fish limits at 16 inches over the timeline specified, May 20 through September 4th.

Thank you

Damon Sacco

From: Robert Ouellette
To: Fish, Marine (FWE)
Subject: Sea bass
Date: Wednesday, March 1, 2023 9:32:26 AM

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MARINE. FISH
Don't see where the for hire boats share any of this reduction
Why is it with all the cost of having your own boats that the guy on a charter brings home a larger take? Yes also charter boats land more fish than private boats by a large number , keepers and throw backs . They know where to fish , they're out there every day
Give the guy a break that is finding it so expensive to fish and not worth the time or money for so few fish . Most say , more Sea bass than ever . Maybe climate change!

Thank You

Sent from my iPhone

From: Charles Young
To: Fish, Marine (FWE)
Subject: Sea Bass
Date: Wednesday, March 15, 2023 8:46:09 PM

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I strongly suggest Option 6 and agree with 4 and 5

Charles Young

Sent from Mail for Windows

From: Carl Johansen
To: Fish, Marine (FWE)
Subject: Sea bass
Date: Wednesday, March 1, 2023 5:05:40 PM

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I do not understand why the resource is open during the time frame when the sea bass are doing there thing to reproduce , simply put, shut it down completely[for commercially and recreational]If delaying the opening will allow the season to maintain the same numbers and size of fish to keep for both users of the resource. Thank you for understanding , what ever we do should be observed by both users groups to be fair to the resource and the users. Carl Johansen

Peace and Prayers

From: Dmitry Petrov
To: Fish, Marine (FWE)
Subject: Seabass and scup regulations 2023 vote
Date: Wednesday, March 15, 2023 10:39:39 PM

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Hi, Mr Daniel McKiernan,
I'm a frequent customer of the for-hire fleet in MA, especially for Bounty Hunter, and would like to vote for option 6 for black sea bass limits for the 2023 season.
As for scup size and bag limits I'd like to put my vote for the 11" size option without reducing bag limits from May to September.
Thanks

--
Best regards,
Petrov Dmitry

From: fvcynthiac@comcast.net
To: Fish, Marine (FWE)
Cc: Silva, Jared (FWE); McKiernan, Dan (FWE)
Subject: Seabass and Scup take reductions call follow up
Date: Tuesday, March 14, 2023 8:38:13 AM

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Good Morning:

I am writing in response to last nights call on proposed reductions to scup and seabass retention limits. Once again, the disappointing part of the discussion is that the options presented are not really options, but rather the course of action the DMF will be taking with little or no input from user groups.

1. I want to start with the elephant in the room that continues not to be addressed with Black Seabass. The seabass, a protogynous hermaphrodite, starts its life as a female reaching sexual maturity at age 2 (approximately 12"), well below the minimum threshold for retention in MA. Therefore, the success rate for spawning is tremendously high. This is something you already know, but when applied to population modeling, completely alters the way the population structure and management strategies need to be addressed.

2. The last couple of years, the water was warmer than usual in the Spring, and the run of large male seabass establishing spawning locations in Buzzards Bay was 2 weeks early or better. While pursuing tautog, well prior to the opening of Black Seabass, we were encountering large schools of Black Seabass on the rock piles in eastern Buzzards Bay. When the season did open, the water had warmed enough to cause the bigger fish to seek deeper water in Buzzards Bay, 30-40' rather than the "usual" haunts between 25-30'. A complaint I heard from a member of your staff last year was that they were only able to find undersize seabass on the locations they usually find large seabass and then assumed there were no large seabass (18-22"). By moving to deeper water, I was able to find limits of jumbo, male seabass on every one of my charters without issue. Some mornings I had to move around to get on the biomass and away from the undersize fish. Until 2022, I had not done any black seabass fishing in August and September. The numbers of undersize seabass I encountered from Vineyard Sound to Noman's Island on multiple trips was literally mind blowing. They are on every rock pile from 25'-120' in high numbers. Catching a limit of large males was a little more challenging due to the aggressiveness of the smaller fish.

3. I am in agreement with every charter captain who spoke last night. Customers are no longer willing to travel to fish MA for seabass and scup. I work the fishing shows up and down the coast as a rep for my sponsors and the common theme from previous NJ Saltwater Fishing Expos, prospective charters are no longer willing to come up and fish for seabass and scup. I will be in NJ again this weekend supporting one of my sponsors and a local tackle shop while trying to book spring charters for seabass and scup. I will be reporting back to the DMF with a synopsis of the response from NY and NJ prospective customers. The economic impact of

these decisions is far reaching.

4. Although I do not retain a large amount of scup on most of my charters, I am continuously releasing scup throughout the trip from lines in to line out which taints the models you are using. My customers are often families with kids, the scup offer a lot of fun on light tackle and enough are generally retained for a couple dinners and they are well over 12". We release well over a boat limit of fish on every trip.

5. The big loser at the end of the day is every lobsterman who fishes in MA waters. Seabass are voracious and I have opened up a lot seabass with multiple juvenile lobsters in their stomachs. An occurrence not unique to Buzzards Bay.

If the options presented yesterday are the only options for 2023, then I support Option 6 for black seabass. The arguments made to increase the scup retention size to 11" and 50 fish retention limit have merit and should be seriously considered.

I am also suggestion that more interaction with user groups occur in 2024 before any management decisions are formulated. A 4 fish limit for seabass is not enough and considerations should be made to increase the limit to at least 5 or even more. Using the age at maturity model along with the fact that you have a majority of the population begin as females, more, larger fish, can be taken without impacting the spawning biomass.

I welcome the opportunity to meet and discuss further.

Have a great day!!.

Tyler Macallister, Owner/Captain
F/V Cynthia C^2 / Bottom Line
(508) 221-8991 (m)
fvcynthiac@comcast.net

From: Jake Crystal
To: Fish, Marine (FWE)
Subject: Support for Separate Category and Regulation Changes for the For-Hire Fleet
Date: Wednesday, March 15, 2023 5:59:33 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Director Daniel McKiernan,

I hope this message finds you well. As a frequent and valued client of Bounty Hunter Charters, I would like to express my strong support for the adoption of options 5 or 6 for the Black Sea bass management, which would maintain the STATUS QUO from last season. This decision would greatly benefit the for-hire fleet in Massachusetts and allow for sustainable growth in the industry.

By creating a separate category for the for-hire fleet, businesses like Bounty Hunter Charters will have the opportunity to access a larger share of the resource, ultimately benefiting the local economy and ensuring a thriving recreational fishing community.

Furthermore, I would like to express my support for the establishment of an 11-inch minimum size for Scup on for-hire vessels and a 50 fish bag limit from May 1 to September 4. This measure will help protect the Scup population while still allowing for ample recreational opportunities for anglers on for-hire vessels.

As a loyal client of Bounty Hunter Charters and a participant in the recreational fishing community, I firmly believe that the adoption of these measures will provide long-term benefits for our marine fisheries, the for-hire industry, and the countless individuals who enjoy spending time on the water.

Thank you for your time and consideration. I hope that you will take these recommendations into account as you make decisions regarding marine fisheries policies in Massachusetts.

Sincerely,

Jake Crystal

From:	larry louallen
To:	Fish, Marine (FWE)
Subject:	To Daniel McKierman Am A Frequent passenger /Fisherman on the Fleet For Hire Along with Dozens and Dozens of Friends who Fish Massachusetts For Hire Boats eg the Bounty Hunter Fleet as well as the HelenH fleet also and others I Choose MODE 6 of th...
Date:	Wednesday, March 15, 2023 6:11:52 PM

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Sent from my iPhone

From: Joanne Morrow
To: Fish, Marine (FWE)
Subject: To Director Daniel McKiernan
Date: Wednesday, March 15, 2023 11:03:42 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I frequently use the For Hire fleet in Massachusetts (very often onboard Bounty Hunter charters in Fairhaven). I fully support the mode shift that will create a separate category for the “For Hire fleet”. Additionally I also fully support an 11” minimum size for scup onboard the “For Hire” boats . And I also hig a 50 Fish Bag Limit from May 1st till September 4th of calendar year. I have been reading a proposed table with options And I Fully Support Options 4, 5 and 6 with my Strongest emphasis of support upon Option 6. Thank you for hearing the supportive concerns of those who fish n Massachusetts
Sent from my iPad

Attachment 3.

Overview of results from "Massachusetts 2023 Recreational Black Sea Bass Management Options - Angler Feedback Survey"

Total Responses: 807

Figure 1. Responding to survey as:

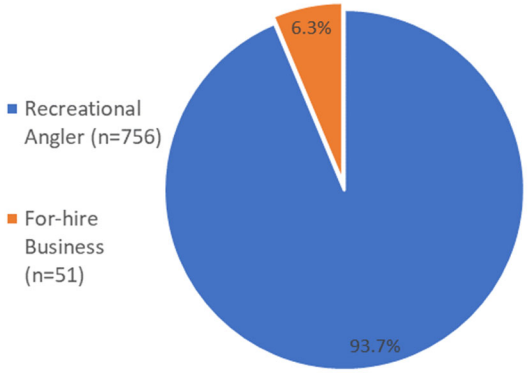

Figure 2. Of recreational anglers responding, primary mode of fishing for black sea bass is:

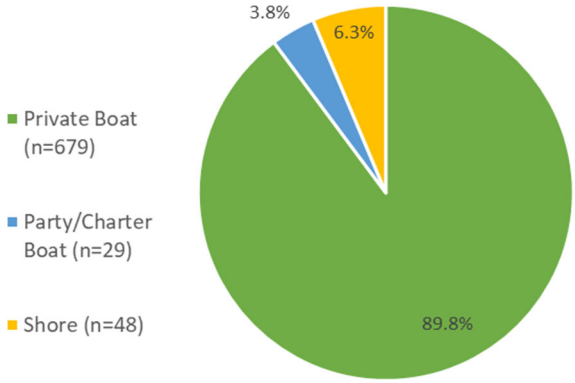

Figure 3. Primary areas fished for black sea bass (asked to check all the apply):

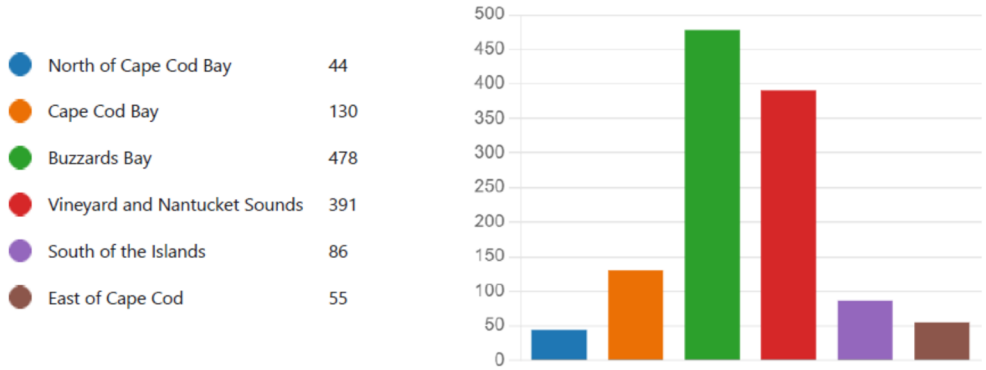

Figure 4. Approximate number of black sea bass fishing trips taken in 2022:

Attachment 3.

Table 1. Summary ranking results by various groups of respondents.

All Responses (807)						
	Most Preferred	2nd Preferred	3rd Preferred	4th Preferred	5th Preferred	Least Preferred
Option 1	48%	19%	13%	10%	7%	9%
Option 2	14%	32%	22%	11%	13%	6%
Option 3	13%	21%	34%	17%	9%	6%
Option 4	4%	7%	19%	38%	16%	14%
Option 5	9%	12%	6%	12%	38%	22%
Option 6	13%	10%	6%	13%	16%	43%
For-hire Business (n=51)						
	Most Preferred	2nd Preferred	3rd Preferred	4th Preferred	5th Preferred	Least Preferred
Option 1	18%	13%	15%	23%	25%	11%
Option 2	8%	11%	3%	15%	28%	32%
Option 3	2%	4%	18%	23%	25%	26%
Option 4	6%	9%	45%	23%	6%	13%
Option 5	18%	47%	15%	8%	17%	0%
Option 6	49%	16%	5%	8%	0%	18%
Recreational Angler (n=756)						
	Most Preferred	2nd Preferred	3rd Preferred	4th Preferred	5th Preferred	Least Preferred
Option 1	50%	19%	13%	9%	6%	9%
Option 2	14%	33%	23%	11%	12%	5%
Option 3	13%	22%	35%	17%	8%	5%
Option 4	4%	7%	17%	39%	17%	14%
Option 5	8%	10%	6%	12%	40%	23%
Option 6	10%	10%	6%	13%	17%	44%
Recreational Angler with Party/Charter as Primary Fishing Method (n=29)						
	Most Preferred	2nd Preferred	3rd Preferred	4th Preferred	5th Preferred	Least Preferred
Option 1	38%	8%	19%	14%	5%	27%
Option 2	10%	28%	14%	5%	33%	5%
Option 3	14%	12%	29%	14%	10%	27%
Option 4	7%	16%	19%	19%	14%	18%
Option 5	24%	16%	10%	10%	29%	9%
Option 6	7%	20%	10%	38%	10%	14%
Recreational Angler with Private Boat as Primary Fishing Method (n=678)						
	Most Preferred	2nd Preferred	3rd Preferred	4th Preferred	5th Preferred	Least Preferred
Option 1	53%	19%	12%	8%	6%	8%
Option 2	13%	34%	24%	11%	11%	5%
Option 3	13%	22%	35%	16%	8%	4%
Option 4	3%	7%	16%	40%	17%	13%
Option 5	8%	8%	6%	12%	40%	25%
Option 6	9%	9%	6%	12%	18%	46%
Recreational Angler with Shore as Primary Fishing Method (n=48)						
	Most Preferred	2nd Preferred	3rd Preferred	4th Preferred	5th Preferred	Least Preferred
Option 1	25%	18%	16%	17%	17%	13%
Option 2	25%	23%	14%	14%	22%	0%
Option 3	13%	15%	35%	20%	8%	8%
Option 4	6%	3%	22%	26%	14%	29%
Option 5	4%	31%	5%	14%	36%	8%
Option 6	27%	10%	8%	9%	3%	42%

Attachment 3.

Table 2. Survey data truncated to mode, rankings and rationale, sorted by responses from recreational anglers followed by responses by for-hire businesses.

		Options Ranking: Most to Least Preferred						
Responding as:	Primary fishing method for BSB:	Most	2nd	3rd	4th	5th	Least	Rationale for rankings:
Angler	Private Boat	1	6	2	2	5	6	
Angler	Private Boat	1	3	2	4	5	6	
Angler	For-hire Boat	1						
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	6	3	2	1	4	5	
Angler	Private Boat	2	1	3	4	5	6	Easiest to remember
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1					6	This is ridiculous. No matter where I fish I am tripping over sea bass.
Angler	Shore	2	1	3	5	4	6	Keeping the regulations as close as possible to last year's allows for less confusion
Angler	Private Boat	1	3	2	4	5	6	I'm opposed to any regulation that distributes more fish to the for-hire fleet than private anglers.
Angler	Private Boat	3	2	1	5	4	6	SIMPLE IS BETTER. Also I lean towards slightly tighter regulations. But, I mostly have opportunities to fish in September, so would hate to see that window closed entirely.
Angler	Private Boat	1	2	4	5	3	6	
Angler	Private Boat	6	3	1	5	2	4	
Angler	Private Boat	2	3	4				
Angler	Private Boat	6	3	1	2	4	5	
Angler	Private Boat	6	2	3	1	5	4	option 6 reduces bag limit during spawning aggregation, allows for-hire limit that might reduce lost customers due to bag limit. In all cases enforcement is critical.
Angler	Private Boat	3	1	2			5	
Angler	Private Boat	1	4	2	3	5	6	
Angler	Private Boat	2	3	1	4	5	6	less complicated regulation= better management
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	1						
Angler	Private Boat	3	1	6	4	2	5	

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Angler	Private Boat	1	3	2	5	4	6	more food
Angler	Private Boat	1	2	3	5	6	4	As a recreational fisherman, I would rather be able to take 4 fish.
Angler	Private Boat	2	3	1	4	5	6	Option 6 has too many dates and no one will keep track of them. Simple and clear regulaations are the most likely to be followed. I don't like prioritizing for hire over private vessels. And
Angler	Private Boat	1						
Angler	Private Boat	2	3	1	4	5	6	I don't believe for hire should be able to keep that many more fish than recreational. I don't like option 1 because a half inch can get confusing. I don't like the limits changing to much throughout the season because then I get confused about how many fish I can keep.
Angler	Private Boat	6	5	4	3	2	1	Longer season, less fish per trip, 2 fish per person is plenty for a meal or two!
Angler	Private Boat	1	2	3	4	6	5	
Angler	Private Boat	2	1	6	3	4	5	
Angler	Private Boat	1						The best fishing is in May and June in Vinyard sound.Vinard
Angler	For-hire Boat	2	1	3	5	6	4	For hire take should be reduced and rec(shore size increased!
Angler	Private Boat	5	4	3	2	6	1	
Angler	Private Boat	1	3				5	Prefer 16 1/2" full season per person
Angler	Private Boat	1	3	2	6	5	4	need the season yo go into Sept
Angler	Private Boat	3	2	5	4	1	6	
Angler	Private Boat	2	1	3	4	5	6	Other than option 1 and 2 things are to confusing and people won't get it! For hire should be same as private.
Angler	For-hire Boat	1	2	3	6	5	3	Let the fish grow, take fewer
Angler	Private Boat	3	1	2	4	6	5	There is no reason for hire vessels should be able to keep more, option three suits the fish best as they are in tight to shore and fair to all anglers.
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	5	4	6	3	
Angler	Private Boat	3	2	1	6	4	5	I think all fishers should abide by the same rules as we all want to conserve fish. Should not matter whether you are on charter, party boat, private boat or fish from shore. I like option 3 to extend the season a bit. Later in season i often catch seabass when trolling for stripers. Those fish are often worn out. I release themB/c season is closes but worry some do do not survive
Angler	Private Boat	1	2					

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Angler	Private Boat	1	3	2	4	5	6	We currently don't keep fish under 17 inches with most over 18 inches as most are male and they have more meat.
Angler	For-hire Boat	5	6	4	1	2	3	
Angler	Private Boat	1	4	6	2	3	5	I seldom keep sea bass below 18" as they are too hard to fillet. A bigger bag of larger fish is my preference.
Angler	Private Boat	5	2	3	6	4	1	I think my rankings support the idea of allowing people to fish and keep fish over a longer period, just reduce the numbers that they are allowed to keep, And avoid increasing the size to 16.5.
Angler	Shore	1	3	2	6	5	4	
Angler	For-hire Boat	6	5	1	4	2	3	I'd prefer bigger limits for for-hire vessels since I go with it primarily
Angler	Private Boat	3	2	1	6	5	4	
Angler	Private Boat	1						none of these options is acceptable, I with my limited amount of days and two lbs of squid am not a threat to any population of fish. Only being allowed to keep four or less fish make it hard to even bother leaving the dock. It's just not worth it by the time they are filleted it'll have cost me about $245 per lb..... If you want to protect fish stocks stop going after the guy who gets out a few times a year and would like to put some fish in the freezer. Go after the trawlers who kill more fish in one single pull from bycatch alone than I could kill in a lifetime. I don't know if y'all have seen the acres of dead fish behind a trawler that has pulled in their nets? I'm talking about the dead fish that never even made it onto the boat?
Angler	Private Boat	4	5	6	3	2	1	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	2	3	5	4	6	I like to fish as long as possible. Only take what I eat. I also catch a lot of 16" fish so adding a half inch may help save the stock.
Angler	Private Boat	1	3	4	6	2	5	
Angler	Private Boat	1	3	4	2	6	5	
Angler	Private Boat	5	6	4	3	2	1	
Angler	Private Boat	6	5	3	1	2	4	Longer season, fewer keepers... but more patrols to catch those poaching, which contributes to these required changes.
Angler	Private Boat	2	1	4	3	5	6	reasonable quotas
Angler	Private Boat	1	5	6	3	2	4	I support raising minimum size. I think 17 inches would be good.
Angler	Private Boat	1	3	2	4	6	5	For hire vessels should not have a higher bag limit than private anglers. They are selling the experience, not the meat!

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Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	1	2	5				Black sea bass is one of the finest table fish in our waters. Unlike fluke and striped bass, it also freezes well. If I go through the effort of launching my boat my goal is to catch fish for dinner and to stock the freezer. Four fish at 16.5 inches is a good day's catch. However, I'm unhappy with the early September end to the season. September is a great month to fish in Island waters. While targeting bass, blues, bonito and false albacore I invariably catch sea bass. It would be great to be able to keep at least one or two fish for the table. Thanks.
Angler	Private Boat	1		6				
Angler	Private Boat	1	2	3	4	5	6	Recreational fishers contribute significant amounts of funds to aid in management of fish fish species. For-hire vessels do multiple trips a day with many anglers, whereas many recreational anglers are limited to weekends and when they have vacations to fish during the week. More preference is given to commercial and for-hire vessels. Recreational fishers should have more opportunity to catch and keep black sea bass, and commercial and for-hire vessels should not have a higher possession limit than recreational anglers
Angler	Private Boat	1	2	3	4	5	6	NO WAY SHOULD FOR HIRE BE GIVEN BIGGER LIMITS! ALSO Increasing size limits really helped the haddock should increas that to 18" as well
Angler	Private Boat	1	2	6				
Angler	Shore	2	5	4	3	1	6	Better to keep it simple and reduce catches but keep a fairly long season. I fish the Canal a lot, and the biggest problem is large families taking undersized fish all day. They are clever; run their catches up to a car so the wardens only see what's in the Shore bucket!
Angler	Private Boat	1	2	3	4	5	6	Ease of use
Angler	Private Boat	3	4	2				
Angler	Private Boat	5	6	1	3	4	2	I prefer a longer season
Angler	Private Boat	1	3	2	6	4	5	
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	4	3	5	6	Prefer not to answer
Angler	Private Boat	5	6	4	3	1	2	I would prefer a longer private vessel season even if it means less fish can be harvested.
Angler	Private Boat	1	2					

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Angler	Private Boat	1	2	3	4	5	6	i find allowing party boats to get more fish than me a person catching fish to eat with my family insulting. i bet some people on charters are giving there fish to people on the boat when they get off.
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	1	3	4	5	6	2	
Angler	Private Boat	3	2	1	4	5	6	both commercial and recreational fisheries should share in the responsibility of reducing caught fish, and a shorter season, lower bag limit, and/or larger fish seem to all be viable strategies for doing so.
Angler	Private Boat	1	3	6	2	4	5	For hire vessels should not have higher retention limits than private recreational boats
Angler	Private Boat	5	4	2	3	6	1	
Angler	Private Boat	1	2	3	4	6	5	Private anglers make fewer trips for BSB - they should be preferred for most catch over for-hire vessels that may make daily trips and are less audited/reviewed for short catch.
Angler	Private Boat	1	2	4	3	5	6	There should be NO difference b/w for hire and recreational angler limits. It's unfair and another benefit for wealthy people.
Angler	For-hire Boat	1	4	2	3	5	6	
Angler	Private Boat	5	1	3	6	2	4	I prefer the longer season. I am also disturbed by the fact that For Hire vessels running a commercial business are getting a larger bag limit then the public regarding a public resource.
Angler	Private Boat	1	2	3	4	5	6	Absolutely no splitting of the Recreational catch limits based on Private vs For Hire vessels. Futhermore, the fact that every year we face a decrease in take indicates that the ASMFC is failing its duties to effectively manage fisheries stock. Futhermore, this indicates that the ASMFC board is choosing methods and philosophies that are failing to protect our fisheries stock.
Angler	Private Boat	3	1	6	5	4	2	
Angler	Private Boat	1					6	Should keep it as simple as possible.
Angler	Private Boat	1	3	2	4	5	6	Watching fish traps get pulled full of fish and the amount of sea bass in the waters the limit should always be at least 4 or more per trip even if this means raising the size limit
Angler	Private Boat	3	1	2		5	6	there should be a level playing field between private and charter
Angler	Shore	1	2	3	6	5	4	

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Angler	Private Boat	1	2	3	4	5	6	I don't favor any rules that allow a higher bag limit on for hire vessels. I would also like to see more enforcement of all bag limits
Angler	Private Boat	2	5	3	6	4	6	
Angler	Private Boat	1						
Angler	Private Boat	2	1	4	3	5	6	
Angler	Private Boat	2	4	5	6	3	1	I'd prefer to have an open season all summer with a 16" limit. Option 6 seems too complicated. Ideally there would not be higher limits for "for hire" vessels. They don't need to be taking 5 people out and coming back with 20 fish when we're trying to reduce the harvest of these fish.
Angler	Private Boat	1	2	3	4	5	6	I firmly believe that putting restrictions on law abiding anglers will not help solve this problem...we need more enforcement of the people stealing boats full of illegal fish as I have witnessed this with my own eyes.
Angler	Private Boat	3	1	2	4	5	6	Best fishing , less crowded in early season.
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	6	5	4	3	2	1	Early season I typically limit pretty well. Mid season or summer it is very hard to catch keepers. Fall while tautog fishing late Sept to Oct, keeper seabass are caught in the mix but out of season.
Angler	Private Boat	1	3	2	4	6	5	Preference to charter boats for such an accessible resource is frustrating and unfair. A rec limit of 3 fish/person almost isn't worth it. 4 is a good balance and I'm fine with a higher size limit as I try and keep fish over 17" anyways.
Angler	For-hire Boat	3	1	2	4	6	5	option 3 is the most fair...it's not worth it for a fore hire vessel to go out for less than 4 fish per person, but that doesn't mean you should hose the private guys
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	4	5	3	6	There are plenty if fish for harvest and a half inch increase does not make it more difficult to harvest your limit.
Angler	Private Boat	3						
Angler	Private Boat	4	2	3	5	1	6	
Angler	Private Boat	1	2	3	4	5	6	
Angler	Shore	6	5	3	1	2	4	Longer season - early September is always too short, I catch legal sized black sea bass from shore in September that would make a great meal, but I have to release them.
Angler	Private Boat	1	2	5	6	3	4	I prefer a longer season

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Angler	Private Boat	1	3	2	4	6	5	Absolutely need to have 4 fish limit for private shore and bear shore vessels early season during the buzzards bay spawn, 16.5 inch minimum is easily attainable when the fish are more accessible to small boat owners and shore anglers.
Angler	Private Boat	3	2	1	4	5	6	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Shore	1						
Angler	Private Boat	2	1	3	4	5	6	shorter season, less fish landed
Angler	Private Boat	1						For hire should not be entitled to more fish than private / recreational. It should all be the same. It generates confusion to not have conformity.
Angler	Private Boat	1	6	4	2	5	3	Option one seems fair. Preservation of the fish is important but I would like to see for hire be the same size and catch limit.
Angler	Private Boat	1	4					it is not worth leaving the dock for less than 4 fish. I would like to have 5
Angler	Private Boat	1	2	3	4	5	6	Bigger fish=more meat for a meal and more smaller fish left to grow
Angler	Private Boat	5	6	3	1	4	2	prefer a longer season
Angler	Private Boat	6	5	1	3	2	4	Season into October for greatest chance at the largest fish
Angler	Private Boat	1	2	4	3	5	6	When there are multiple different date ranges, it is often times easy to forget what the limit is for the day. I would rather be able to catch less fish with one date range then potentially more fish with more date ranges. Also I am all for an increase in the minimum size for all because then they can stay be tossed back to grow bigger and reproduce.
Angler	Private Boat	1	2	5	6		4	I would rather have a higher minimum size and longer season I personally do not keep any fish under 20"
Angler	Private Boat	5	6	4	3	2	1	
Angler	Shore	1						
Angler	Private Boat	1	3	4	6	5	2	
Angler	Private Boat	2	1	6	3	4	5	
Angler	Private Boat	1					6	No change should be made for private fisherman. Your reasoning for imposing these restrictions are misguided. If you "truly" want to improve black sea bass numbers and size, then limit commercial fisherman only in the number and size of fish taken. This annual and constant restriction tightening on private fisherman, and apparent disregard on what commercial fishing is doing to our sport is destroying the fish stock for those private fisherman who just want to try to have a nice day of fishing a few times a year.

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Angler	Private Boat	1	2	3	5	4	6	
Angler	Private Boat	1	2	3	6	4	5	Simplicity is king, having separate rules for "for hire" is not something I agree with, historically finding fish over 16.5 has not been an issue.
Angler	Private Boat	1						Keep it simple or mistakes will be made, consistency across the board
Angler	Private Boat	1	2	3	4	5	6	for hire should not have a higher limit than private
Angler	Private Boat	6	3	2	1	4	5	
Angler	Private Boat	6	5	4	3	2	1	Prefer longer season with less catch limits
Angler	Shore	6	5	3	2	4	1	Season ends in October
Angler	Private Boat	1	2	3	4	5	6	
Angler	Shore	4						
Angler	Private Boat	1						It is not worth it to start your boat to go catch one keeper fish
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	1	4	3	2	5	6	
Angler	Private Boat	1	2					
Angler	Private Boat	5	6	3	2	4	1	I generally support options that allow for smaller size limits and longest season. I generally only bring home one fish at a time for dinner anyway. It doesn't bother me to bring home potentially fewer fish, but I don't want the limits changed to make it harder to find keeper fish or reduce my season to get them.
Angler	Private Boat	3	1	2	4	6	5	For hire vessels have far more anglers and fish more intensely than rec fisherman. Rules should apply evenly between both groups. If you want to preserve the resource shut down the season all together after July 1.
Angler	For-hire Boat	6	2	3	5	4	1	better chances to have keepers for a longer time.
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	4	3	2	5	6	1	
Angler	Private Boat	6	4	5	3	1	2	
Angler	Private Boat	6	1	2	1	1	3	
Angler	Private Boat	1	2					less than 3 fish doesn't make a meal for the family!!
Angler	Private Boat	1	2	4	3	6	5	
Angler	Private Boat	1	4	2	3	6	5	It cost a tremendous amount of money to go fishing on a private boat these days. I am extremely disappointed that the Gov't is allowing me to catch 4 Sea Bass per person. I think the limit should be 8 Sea Bass per licensed fisherman. There are plenty of Sea Bass in the ocean these days and I cannot understand why the Recreational Catch Limit is so low.

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Angler	Private Boat	1	2	4	5	6	3	
Angler	Private Boat	2	3	5	4	1	6	
Angler	Private Boat	3	1	2	6	4	5	I primarily fish for sea bass May through June. This is when I fill my cooler for fish for the season, so I don't need to keep striped bass for the table. So a 4-fish recreational limit is better for me and I don't mind it going down to 2 after June 30. I'm also personally fine with the limit going to 16.5" in _any_ of these scenarios -- it's not hard to find a 16.5" sea bass, and if it helps the stock let's do it.
Angler	Private Boat	2	3	4	5	6	1	
Angler	Private Boat	1						I only have a 14 foot boat I only fish for Black Sea bass until mid July I have not had a problem catching keepers where I go so not sure why it's needs to be more regulated
Angler	Private Boat	2	1	3	4	5	6	Least amount of impact on private anglers. The big charter boats are the ones decimating the stocks--they should have the same limits as private individuals. For hire vessels break regulations regularly
Angler	Private Boat	1						
Angler	For-hire Boat	1	2					
Angler	Private Boat	2	4	3	5	1	6	Complexity of the option to keep track and for Option #1 size going to 16.5
Angler	Private Boat	1	5	2	6	3	4	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	1	3	2				I really get angry and insulted when for hire boats have different rules than the little guy with his own vessel. Seabass are everywhere you put a bait down; I just don't see why there needs to be a reduction. Maybe you energy would be better spent focusing on Draggers which tape the sea floor and kills everything in there path. Why are staggers allowed within state waters? Let them go out a little further so that near shore species have a fighting chance.
Angler	Private Boat	1	3	2	4	5	6	One or 2 fish doesn't provide dinner
Angler	Private Boat	1					5	
Angler	Private Boat	1						
Angler	Shore	6	5	3	2	1	4	Prefer a later season. We vacation in MA in September. And the fish seem abundant and large at that time!
Angler	Private Boat	2	3	1	5	4	6	
Angler	Private Boat	3	2	1				
Angler	Private Boat	3	6	1	2	4	5	Id rather be able to keep more fish during May/June than later in season.

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Angler	Private Boat	1						
Angler	Private Boat	1	2	4	3	6	5	#6 is too complicated and will end up being ignored/abused. #5 is very restrictive to rec anglers, with no imposition on for-hire. #3 is no change to spring fishing, typically when the stock gets decimated. #4 is pretty fair, but I don't believe it will reduce by 10%. #2 is very fair. #1 IMO will reduce by the most since I think a lot of the take is right at 16" today. I would even be OK with a #1+#2 combined option - 3 fish at 16.5".
Angler	Private Boat	1	2	4		5	6	I only keep the larger fish anyway- I fish all summer and a low bag limit in July/Aug would coincide with my vacation/fishing
Angler	Private Boat	6	5	1	4	3	2	Longer season until fall preferred
Angler	Private Boat	1	2					
Angler	Private Boat	1	3	2				Larger fish are normally caught early in the season
Angler	Private Boat	2			1			Answered as a recreational angler that catches them in our recreational lobster traps but I also run a charter boat. There is not a high enough quantity to target them commercially yet in Cape Ann but I know that day is coming soon with the overall ocean temperature rising.
Angler	For-hire Boat	5	4	6	1	2	3	Length of season
Angler	Private Boat	5		3	6	2	1	16.5 to big, fewer fish longer period to fish
Angler	Private Boat	6						Extended season
Angler	Shore	2						
Angler	Private Boat	1	2	6	5	4		
Angler	For-hire Boat	1						Stop taking away fish from recreational anglers - if you wish to increase size limits to a small degree , have at it , but stop with the catch limits
Angler	Private Boat	2	1	4	5	6	3	
Angler	Private Boat	1	2	3	4	6	5	Generally I prefer simple rules for all recreational fishermen, I have the added expense of my own boat and don't believe the rules should be special for "for hire" boats. I don't keep females and mostly keep fish over 18" so the size it less important to me.
Angler	Private Boat	5	4	1	2	3	6	easy to remember and no reason for private boats to have more than 2 or 3 fish
Angler	Private Boat	2	1	4	3	5	6	The least regulations the easier to remember time tables and number limits
Angler	For-hire Boat	3	2	5	6	4	1	
Angler	Private Boat	3	2	4	5	1	6	1: too hard to measure, 6: too confusing, 5: too few fish for the prime time, 2-4: all about the same

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Angler	Private Boat	5	2	1	3	4	6	Longer season. Option 6 is a mess, keep it simple w/o the confusing, varying limits per different date spans.
Angler	Private Boat	2	3	4	5	6	1	For hire vessels are fishing recreationally. The rules for recreational anglers whether on a private boat or a charter boat should be the same - since both groups are recreational anglers.
Angler	Private Boat	3						
Angler	Private Boat	3	1	2	4	6	5	
Angler	Private Boat	1	3	2	6	4	5	Private and for-hire must be equitable. I would support going to a 17" minimum size to strengthen the fishery.
Angler	Shore	2	3	4	5	6	1	
Angler	Private Boat	1	2	3	5	4	6	
Angler	Private Boat	3	6	2	4	5	1	
Angler	Private Boat	1	2	4	5	3	6	Option 1 sounds the best and least complicated ie one size one season
Angler	Private Boat	3	1	6	4	2	5	
Angler	Private Boat	1	3		2			
Angler	Private Boat	3	4	2	1	5	6	
Angler	Private Boat	2	1	3	6	4	5	Fairness for all.
Angler	Private Boat	1	2					
Angler	Private Boat	2	1	3	4	5	6	Too hard to remember the date ranges, set limits for the entire season.
Angler	Private Boat	4	2	1	3	5	6	This should be simple and easy for people to understand. It should be really easy for recreational anglers who barely get to fish and have to study every time they catch something and fish ends up dying while waiting.
Angler	Private Boat	1	2	4	3	5	6	
Angler	Private Boat	1	2	3	4	5	6	It should go back to 5 fish at 16.5 inch.
Angler	Private Boat	6	5	3	2	1	4	Extending the season and limiting fish per trip ensures more action and longer periods of enjoyment.
Angler	Private Boat	1	2	3			6	
Angler	Private Boat	3	4	2	1	6	5	
Angler	Private Boat	1	6	2	5	3	4	It won't be worth going fishing from boat lowering limits. Boat slips are scarce and expensive Memorial Day until Labor Day. Shortening season locks out many private boat owners.
Angler	Private Boat	6	3	1	5	2	4	
Angler	Private Boat	3						

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Angler	For-hire Boat	5	6					I'd prefer option 5 and the Sep thru October part of option 6. Due the cost of a For-Hire trip 4 fish is a viable option for most of the year
Angler	Private Boat	6	3	2	4	5	1	My rationale is the following. I don't want the minimum fish size to go up by 0.5" because it is already difficult enough to catch a large enough BSB to keep. I catch a lot of fish under 16" that I have to discard, before I finally get a fish greater than 16 to keep. My second criteria was to pick the option that would provide me (a private boat angler) with the highest bag limit. My next criteria was what would achieve the longest season. Lastly, I think it's important for the for-hire fishery to be allowed a slightly higher bag limit, especially since they have the lowest impact on the stock compared with private boat anglers. Keeping the for-hire charter fleet viable is important to the economy and fish-tourism industry. I'm fine with them catching slightly more fish to satisfy and attract customers, so long as it is not egregiously more fish compared with private boat bag limit. Feel free to contact me for more feedback.
Angler	Private Boat	3	5	2	6	4	1	I don't think people need to keep lots of fish. I'm not sure why the rules for charters are different for those of individuals.
Angler	Private Boat	1						For hire boats should not be allowed more fish then recreational anglers! They go out everyday vs. recreational anglers who most only get weekends due to the fact they're not captains
Angler	Private Boat	1	6	5	4	3	2	Over abundance of BSB
Angler	Private Boat	1	2	3			5	
Angler	Private Boat	3	1	2	4	6	5	Consistent regs across modes and time periods will maximize angler satisfaction and minimize non compliance.
Angler	Private Boat	6	1	5	3	2	4	
Angler	Private Boat	1	2	5	3	5	6	
Angler	Private Boat	2	1	3	6	4	5	
Angler	Private Boat	5	1	2	3	4		Looking for best approach to maintain health of fishing stock.
Angler	Private Boat	6						
Angler	Private Boat	1	2	4	5	6	3	most generous for the private angler throughout the season
Angler	Private Boat	1	3	2	4	5	6	Simplicity, and equality between the private and charter vessels.
Angler	Private Boat	1	2	3				
Angler	Private Boat	1						Need to be able to keep enough fish to justify a two hour trip each way

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Angler	Private Boat	1	3	2	4	5	6	I will always go against decreasing the number of fish you can keep. Personally since the limit on striped bass decreased to one I only fish for them when they are in close because I can't justify the fuel cost to keep one fish. Now you want to decrease the number of sea bass. I say raise the size limit not the amount.
Angler	Private Boat	1						
Angler	Private Boat	1	3					
Angler	Private Boat	1	2	3	4	6	5	least confusing options are the two which leave the length limit the same for the entire season and also do not have different limits for recreational anglers vs. for-hire vessels. changing limits over the course of the season is less than ideal for recreational anglers who are only fishing a few times per year.
Angler	Private Boat	1	2					
Angler	Private Boat	4	2	3	5	1	6	Fairness to all groups
Angler	Private Boat	1	2	3	4	5	6	Abundance of species
Angler	Private Boat	1	6	3	4			
Angler	Private Boat	1	2					Seems to be plenty of um had our limit with in 20 minutes each trip
Angler	For-hire Boat	5	6	4	3	1	1	
Angler	Private Boat	1	2	3	4	5	6	I believe recreational anglers should be allowed as many fish as the for hire charters.
Angler	Private Boat	1	3	4	2	6	5	Limits use to be 15 per fish angler, now down to 4 fish. With the cost of fuel and parking and gear, your risking more accidents with boating and people over filling there boats with people to cover cost of going after these fish.
Angler	Shore	2						
Angler	Private Boat	1	2	6	3	4	5	Most of the fish I keep are over 18", so raising the minimum size doesn't impact me but theoretically significantly helps the stock.
Angler	Private Boat	3	1				5	
Angler	For-hire Boat	1	2	3	6	5	4	I like the same limits for all.
Angler	Private Boat	1	3	2	6	5	4	should not differentiate between private and charter as charters fish every day and will therefore take more fish than a private angler
Angler	Private Boat	1						I don't want a reduced bag for the 3 hour round trip drive, I am not interested in split regs and making things more complex, and am not interested in seeing commercial boats get different regs, especially more liberal.
Angler	Private Boat	1	2	3	4	5	6	Late season is not as good fishing for sea bass in upper buzzards bay
Angler	Private Boat	5	3	2	1	4		Size unchanged with season adjusted. Preferred options not favoring / encouraging increased for-hire effort.

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Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	2	1	3	5	6	4	
Angler	Private Boat	6	5	3	4	2	1	
Angler	Private Boat	1	2	4	3	6	5	
Angler	Private Boat	1						There is a take over of sea bass over scup. Too many sea bass. Regulations are too complicated with changing dates and size limits keep it simple (kis)
Angler	Private Boat	1	4	2	3	5	6	would like to see length limit increase instead of retention limit decrease - more edible meat on bigger fish
Angler	Private Boat	6	4	1	5	3	2	Least amount of worries for an angler
Angler	Private Boat	2	1	3	4	5	6	more consistant and easier to manage and stay up to date on changes in the regulation by date
Angler	Private Boat	2	3	1	4	6	5	Easiest to remember, and I personally do not approve of special consideration for “for hire” preference
Angler	For-hire Boat	2	3	1	6	5	4	
Angler	Private Boat	1	4	2	3	5	6	To increase size of fish and be able to get a good meal out of 4.
Angler	Private Boat	1						16.5" is still too small. BSB below 19" don't produce a large enough filet. The rule should be that the female BSB not be taken. Because of their life cycle, it makes sense to just take the males ("blue color with head knot"). If we left the females alone we'd have a lot more fish.
Angler	Private Boat	1						There are so many black seabass. Why cut back on the recreational fisherman? I would much rather see the cut back on the commercial limit and especially the commercial size.
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	5	1	3	4	6	2	I fish the Boston area and the season is too short. Hard to fish withe boat traffic. Fall more forgiving and fishing is better
Angler	For-hire Boat	1	5	4	6	2	3	Party boat should have stable amount
Angler	For-hire Boat	5	6	4	3	2	1	
Angler	Shore	6	5	4	3	2	1	
Angler	For-hire Boat	1					4	Frankly there simply is no good choice. So just raise length the 1/2 inch.
Angler	Private Boat	1	4					“Keep it simple stupid” May to September season is straight forwardTime

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Angler	Private Boat	1	4	5	2	3	6	Having variable bay limits at different times of the season gets confusing, there are plenty of sea bass so the limit does not need to be decreased; I hand never thought a regulation that allows for-hire vessels to keep more fish than recreational anglers was fare
Angler	Private Boat	2	1	3	4	5	6	"Keep it simple" is a good rule to live by. The more bells and whistles you add, like differences by time period, differences on fishing mode will hurt compliance and understanding
Angler	Private Boat	1	2	3				
Angler	Private Boat	2	3	1	6	5	4	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	2	1	5	6	4	3	
Angler	Private Boat	6						Longer period to fish for food
Angler	Private Boat	1	2	3	5	4	6	Would like to see sustainability in the fishery. Also I feel like the last option is too complicated and would be harder to enforce
Angler	Private Boat	1	3	2	4	5	6	I do not think for-hire boats should be allowed to catch more than recreational. Many charters are from out of state and we should not be giving out of state people preference over Mass recreational anglers
Angler	Private Boat	3	2					Please use the method that best conserves this species.
Angler	Private Boat	2	3	1	5	4	6	Creating a differential between for-hire and private, where for-hire has a higher limit, doesn't make sense to me (assuming the for-hire limit is per angler, not per boat). For-hire vessels have captains that are more likely to hit their limits than private anglers given their experience, so there's the added pressure on the fishery. Further, on-shore anglers have a much more limited area to target and are much less likely to impact the overall fishery.
Angler	Private Boat	2	4	5	3	6	1	161//2 inch would generate more through backs with a higher mortality rate.
Angler	Private Boat	3	1	2	4	6	5	I'm against giving for hire vessels higher limits. The party boats probably take more than recs and they keep every fish that is minimum size. I didn't keep one BSB under 19" last year. You should raise the size limit to 18"— 16" BSB don't have enough meat to bother with anyway.
Angler	Private Boat	6	2	1	4	5	3	Longer season smaller catch ratio in July August due to warm water temperatures
Angler	Private Boat	1	3	2	4	6	5	
Angler	Shore	1	3	5	2	4	6	It all looks the same to me and since I haven't fished for these fish in the past years so it really doesn't matter to me either way

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Angler	Private Boat	3	1	2	4	5	6	
Angler	Private Boat	5	6	1	2	3	4	Lower overall harvest in spring to allow later season typical in neighboring states seems like a good option.
Angler	Private Boat	5	6	2	1	3	4	
Angler	Private Boat	3	1					
Angler	Private Boat	3	1	2	6	4	5	As a private angler id like the opportunity to take home more fish.
Angler	Private Boat	3	2	1	6	5	4	For hire vessels should have the same limits as Private anglers. They go out 7 days a week and are hired by private people. They fish so much that they have a significantly higher number of fish that die after being caught. Head boats are the worst and have no desire to police their passengers as far as # of fish kept, size etc.
Angler	Private Boat	1	2	3	4	5	6	
Angler	For-hire Boat	1	2					
Angler	Private Boat	3	6	4	1	2	5	
Angler	Private Boat	2	3	4	5	1	6	Keep it simple, treat everyone fairly. I caught very few fish over 16.5”
Angler	Private Boat	1	2					16.5 is a fine size. Don't favor any options where fh mode gets more than private modes
Angler	Private Boat	1						
Angler	Private Boat	1	3					
Angler	Private Boat	1						
Angler	Private Boat	1	2	3	4	6	5	I ranked #1 because I eat what I catch and generally release fish under 17/18 inches.
Angler	Shore	2	6	4	5	1	3	
Angler	Shore	1	3	2	4	5	6	I prefer to keep the season and the possession limit as big as possible. 16” fish is still small and I agree to keenly the bigger fish
Angler	Private Boat	1	4	3	5	6	6	The Black Seabass is becoming more and more prolific I don’t understand all these cuts. I think the state should drop all ASMFC guidelines and do what they want
Angler	Private Boat	2	1	3	4	5	6	Keep it simple. I feel like by changing sizing and amounts through out the season is confusing
Angler	Shore	1	2	3	4	5	6	I'd prefer to have the option to catch more from shore- (I don't have access to a boat)
Angler	Private Boat	4						

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Angler	Private Boat	1	2	4	3	5	6	I would like to see regulations that increase the number of black sea bass fishermen can harvest as an active way to reduce the growing population. I believe that the harvest reduction is based on a faulty quota goals that do not account for growing populations due to climate change.
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	4	3	6	5	I don't see the need to distinguish between private boat vs for-hired vessels. I would think that putting greater restrictions on for-hired would help to reduce the harvest more that the private boats
Angler	Private Boat	1	2	3	6	5	6	May-June and September are the best months for Black sea bass. Fluke and bluefish are more active in July and August
Angler	Private Boat	6	5	2	3	4	1	Prefer longer season, lower limit. I don't always keep a limit even if I do catch keeper sized fish. Enjoy keeping both sea bass and tog in the same trip later in the season as well.
Angler	Shore	5	6	3	1	2	4	
Angler	Private Boat	1	2			4	3	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	3	1	2				
Angler	Private Boat	1	4	4		5	6	Reduce commercial limits
Angler	Private Boat	5	6	1	4	3	2	Consistent bag limit for longest season possible
Angler	Private Boat	3	2	1	4	5	6	
Angler	Private Boat	2	1	3	5	4	6	
Angler	Private Boat	3	1	2				
Angler	Shore	3	2	4				
Angler	Private Boat	1						
Angler	Private Boat	1	2	3	3	6	5	
Angler	Private Boat	1						
Angler	Private Boat	1	3	4	5	6	6	There shouldn’t even be any change there are plenty of sea bass out there!!!
Angler	Private Boat	3	2	4	1	5	6	I believe we should allow 4 fish during the May and June month of prime fishing, then reduce to two as we continue into the year to try and help populations
Angler	Private Boat	1	4	3	6	5	2	
Angler	Private Boat	4	2	3	5	1	6	
Angler	Private Boat	1	4	2	3	5	6	
Angler	Private Boat	1	2	3	6	4	5	

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Angler	Private Boat	1	2	3	5	4	6	Don't want any difference between private and for hire, increase size of fish needed to 17"
Angler	Private Boat	1	3				5	
Angler	Private Boat	6	3				1	
Angler	Private Boat	1	2	3				
Angler	Private Boat	6	1	3	4	5	2	Prefer longer season
Angler	Private Boat	5	6	3	1	2	4	Like the longer season-two nice fish is more than enough for private when you can go out multiple times in a season
Angler	Private Boat	3	1	2				
Angler	Private Boat	5	6	3	2	1	4	Prefer longer season with lower possession limit
Angler	Private Boat	2	1	3	4	6	5	
Angler	Private Boat	3	6					
Angler	Private Boat	2	4	1	3	5	6	
Angler	Private Boat	1	3			6		
Angler	Private Boat	2	1					
Angler	Private Boat	4	5	1	6		5	
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	1	3	2	4	5	6	I believe the recreational limits are set to low as they are!
Angler	Private Boat	1	2	3	4	5	6	increase in size is always a benefit. For hire should follow recreational rules.
Angler	Private Boat	4	6	5	2	1		
Angler	Private Boat	1	3	2	5	5	6	
Angler	Private Boat	1	2	4	5	3	6	
Angler	Private Boat	6	5	4	3	2	1	
Angler	Private Boat	2	4	1	3	5	6	
Angler	Shore	2	1	3	4	5	6	
Angler	Private Boat	1	3	6	2	4	5	
Angler	Private Boat	3	1	4	6	2	5	I would like to see the highest bag limit for private vessels in the first part of the season, even if increasing the size limit.
Angler	Private Boat	1	2					Whichever best protects the stock in an easily understandable and enforceable manner is the best option
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	6	5	3	4	1	2	I fish both charter and private, more private. A higher limit early in the season, and an extension of the season with a lower limit, would be my preference.

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Angler	Private Boat	3	6	4	2	1	5	It’s harder enough to catch them from shore and small boat
Angler	Private Boat	5	3	4	1	2	6	
Angler	Private Boat	1	2					
Angler	Private Boat	1						You shud take whatever cuts you nerd from the commercial fishery and open the recreational season soring and fall as wekk
Angler	Private Boat	6	3	5		2	1	
Angler	Private Boat	1	2	6				
Angler	Private Boat	1	2	3	4	5	6	for hire should not get anymore than private or shore
Angler	Private Boat	1	5					Do not want to goThrough expense, time, and energy for just two fish. Could become 4 hours preparation and thirty minutes fishing.
Angler	Private Boat	3	1	2	4	6	5	
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	6	5	4	3	Some are too restrictive and confusing
Angler	Private Boat	3	1	2	4	5	6	My rationale is keep it simple. There shouldn't even be a reduction in the first place.
Angler	Private Boat	5	6	3	2	1	4	longest available season should give everyone a chance to fish due to weather
Angler	Private Boat	1	6	2				
Angler	Private Boat	4	3	1				
Angler	Private Boat	1	2	3	4	5	6	I don't want commercial or party boats getting any more fish but I fish all season long into late Sept. Why not cut back on commercial? They are catching tons of fish in traps.
Angler	Private Boat	1	2	5	4	6	3	
Angler	For-hire Boat	5	4	1	6	3	2	for hire need the business. Keeping fewer fish makes it harder to justify cost of boat etc.
Angler	Private Boat	1						We don’t keep any 16 inch fish anyway. They are too small to give it a decent fillet.We don’t keep any 16 inch fish anyway. They are too small to give it a decent fillet. They do seem to be very abundant
Angler	Private Boat	1						Not worth the trip for 2-3 fish. The younger generation like my kids love to fish now. Price of gas, bait, etc not worth it for under 4.
Angler	Private Boat	1	2	4	3	5	6	
Angler	Private Boat	5	6					Longer season with less fish per trip is preferred.
Angler	Private Boat	3	1	5	2	4	6	Like the extended season because tend ot get seabass as bycatch fluke fishing and they tend to be bigger fish later in the season. 2 is enough during that bycatch season for me

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Angler	Private Boat	1	2	4	6	5	3	The cost associated with operating a boat; travel, gas etc would not be worth fishing for BB if limit is sufficiently reduced
Angler	Private Boat	2	3	5	6	4	1	Keep it simple. Same for everybody. 3 fish. 16 inches.
Angler	Private Boat	6	5	1	2	3	4	
Angler	Shore	3	6	4	5	2	1	
Angler	Private Boat	6	5	3	1	2	4	Length of fall season
Angler	Private Boat	1	2					Keep it simple
Angler	For-hire Boat	4	6	5	1	2	3	
Angler	Private Boat	1	3	2	4	6	5	with limited days availeable to fish want to keep bag limit as high as possible...no problem increasing size limit
Angler	Private Boat	1	2	3	5	4	6	
Angler	Private Boat	4	1	2	3		6	Fairest to all
Angler	Private Boat	1	5	3	6	4	4	Nothings perfect. there have been seabass everywhere and in particular big ones during traditional fall tautog
Angler	Private Boat	3	4	1				Vessel for hire should not have greater catch limits or longer seasons than private boats
Angler	Private Boat	3	1	2	6	4	5	Why should for hire boats have greater bag limits than private parties?
Angler	Private Boat	2	1	4	3	6	5	
Angler	Private Boat	1	2					
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1						For the amount of gas and bait costs, it’s not worth anything less than four keepers
Angler	Private Boat	2	4	3	5	6	1	Why are recreational limited to 16" fish, when commercial can take many more fish at 12"? We go out to have fun and 4 fish limit is fine with me but the recreational size should be 12".
Angler	Private Boat	1	2	3	4	6	5	
Angler	Private Boat	4	2	1	3	5	6	This is my personal preference. I mostly fish in July and August and mostly from my own boat, but occasionally from a six-pack charter. I like to eat the fish, so I ordered them by more fish I can take home. It is hard to catch keepers anyway, so the ordering isn't strong, except that option six isn't great.
Angler	Private Boat	2	3					

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Angler	Private Boat	1						the dates are horrible- most of the large males have passed by late may and instead of throwing all the females back that I will keep a couple that i believe have already spawned. If you want to save the future of bsb you need to cut commercial quota- not recreational.
Angler	Private Boat	4	2	5		3	6	I only keep a few for table fare other is for sport.
Angler	Private Boat	6	5	3	1	2	4	The seabass are in Buzzards Bay very late into the fall. We are constantly throwing back seabass into late October. I would like really like to see the size limit increased further to 17 or even 18" if that gave an extended season and a 3 or 4 fish bag limit throughout the season.
Angler	Private Boat	6	5					
Angler	Private Boat	3	2	1	4	6	5	
Angler	Private Boat	1	3	2	6	4	5	
Angler	Private Boat	1	2	3	4	5	6	It shouldn't matter if your for hire or private it costs money to own a boat and go fishing we should all be equal on how many sea bass we can keep
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	1	2	3	4	6	5	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	1	2					
Angler	Private Boat	2	1	4	3	5	6	
Angler	Private Boat	3	4	2	1	6	5	
Angler	Private Boat	1				6	5	The practice on my boat is to only keep male BS over 18"
Angler	Private Boat	5	6	1	2	3	4	I like having a longer season for those nice late summer early fall fishing tips
Angler	Private Boat	3	5	2	6	1	4	
Angler	Private Boat	1	3	2	4	6	5	Higher possession limit early in the season to make the trip worth it.
Angler	Private Boat	1	2	4	6	3	5	
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	3	4	5	6	Why should charter boats get more than regular anglers I don't agree with that
Angler	Private Boat	1	2	4		5	3	longer season is better than fewer fuish per trip.
Angler	Private Boat	6	1	2	3	4	5	We can fish for Bkack bass as often as we want t
Angler	Private Boat	3	1	2	6		4	For hire vessels go out daily and should not have a limit advantage over private vessels
Angler	Private Boat	6	5	3	1	4	2	

Attachment 3.

Angler	Private Boat	5	4	3	2	1	6	Option 6 is too confusing to keep track of. Commercial boats should be more restricted than private ones. Having open season end after Labor Day is preferable.
Angler	Private Boat	2	3	1	4	5	6	3 fish provides enough for 1-2 meals, 2 fish is too few, 4 is more than necessary.
Angler	Private Boat	6	4	5	1	3	2	
Angler	Shore	6	5	1	2	3	4	Don't mind reduced bag limits, just want more time to wet my line.
Angler	Private Boat	1	2	4	3	6	5	The expense of a boat trip to only be allowed to keep 1 or 2 fish makes no sense. Recreational fishermen fishing from a private vessel should have the same the same daily limit as those fishing aboard a for hire vessel.
Angler	Private Boat	6	5	3	2	1	4	Length of season was the most important part of my decisions.
Angler	Private Boat	5	6	3	1	2	4	Length of season - longer better. Longest season and simplest regs preferred.
Angler	Private Boat	2	1	3	4	6	5	Less complicated system by time, is fairer to both private and for-hire, allows similar seasonal fishing to previous years
Angler	Private Boat	1	3	4	2			
Angler	Private Boat	1	2	3	4	5	6	Best option for every one
Angler	Private Boat	1	2	3	6	4	5	
Angler	Shore	3	2	1	4	5	6	No reason just thinking about how many to catch
Angler	Private Boat	5	6	3	2	4	1	The reason my trip count is low is because in my experience catching keeper size black sea bass in Cape Ann waters usually doesn't happen until a week or two after Labor Day.
Angler	For-hire Boat	3						I don't understand why Commercial fishing is so much longer. uch longer.
Angler	Private Boat	1	3	4	2	5	6	
Angler	Private Boat	1						
Angler	Private Boat	1						Recreational anglers are entitled to the same limits as for-hire vessels. I worked hard to afford a boat, I dont need to pay a guide to keep what I am entitled to with my saltwater license.
Angler	Private Boat	1	2	3	4	5	6	Trying for a equal allocation and a long season
Angler	Private Boat	1	3	6	2	5	4	Heads boats should not have a higher bag limit than private boats. 2 or 3 fish per day isn't worth the effort. Your science is completely wrong and the seabass population is not in decline.
Angler	Private Boat	1	2	3	4	5	6	Option 1 is the only one that makes sence.
Angler	Private Boat	3	2	1	4	5	6	Simplicity of rules makes it more attractive to follow. Colloquially, it's too easy to blow off regs when they are wordy, though admittedly don't know real impact of that

Attachment 3.

Angler	For-hire Boat	3	5					Take less, for sustainable management.
Angler	Private Boat	2	1	3	4	5	6	The daily limit per angler should be the same regardless of private/shore/for hire.
Angler	Private Boat	3	2	1	5	4	6	I don't think recreational limits should be different than for hire.
Angler	Private Boat	2	1	3	4	5	6	Simpler rules easier to follow and enforce.
Angler	Private Boat	2	1	3			6	Option 2 keeps things as similiar as possible for all anglers.
Angler	Private Boat	1	3	4	2	5	6	I think it's simpler and easier to remember to have more of a blanket time period and amount of fish caught. Option 6 seems very complicated and difficult to remember all the dates.
Angler	Private Boat	6	5	3	1	2	2	During summer I don't fish as much. Would prefer the season be spring and fall to align with Martha's Vineyard bass derby.
Angler	Private Boat	1	2					
Angler	Private Boat	1	3	5	6			Running a boat is expensive. A chance to catch more fish (4) even if bigger makes for a better trip.
Angler	Private Boat	6	5	4	3	2	1	
Angler	Private Boat	1	3	2	5	6	4	I would like to see a 18" minimum
Angler	Private Boat	1	2	4	3	5	6	Cost of fuel, bait, etc make it not worth the effort to go out on any trip for 1 or 2 fish. .
Angler	Private Boat	1	3	2	4	5	6	There's plenty of them over 16.5, I don't keep any less than 17" anyway. I'd rather have some more meat than less. Already limited enough to what a recreational angler can take home. I only took home maybe 20 sea bass last year. I really don't see how us recreational anglers are decimating the population.
Angler	Shore	3	1				6	
Angler	Private Boat	3	2	4	5	1	6	
Angler	Private Boat	3	2	4	1	6	5	
Angler	Private Boat	3	1	6				
Angler	Private Boat	3	1	2	4	5	6	
Angler	Private Boat	1	3	2	4	6	6	fishing from shore is less productive, and the restrictions on size limits and kept limits should reflect that
Angler	Private Boat	1						There are just as many fish, but they have moved north, do to water temp. change.
Angler	Private Boat	2	1	3	5	4	6	Least confusing ! , why "for hire" get more fish ?
Angler	Private Boat	6	5	4	3	2	1	Ive had the most success catching them spring and fall after the middle of September
Angler	Private Boat	1	3					

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Angler	Private Boat	6	1	5	2	3		
Angler	Private Boat	3	1	2	4	5	6	
Angler	For-hire Boat	5	4	3	6	2	1	
Angler	Private Boat	3	1	4			5	
Angler	Private Boat	3	1	4			5	
Angler	Private Boat	2	4	6	1	5	3	
Angler	Private Boat	4	2	1	3	5	6	Don't typically fish too late into the season.
Angler	Private Boat	4						Easy to understand, shorter season and allowing comm fisherman a little more opportunity.
Angler	Shore	1	2	6	3	4	5	shutting down might be better
Angler	Private Boat	1						
Angler	Private Boat	2	4		6		3	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	2	3	4	6	5	Based on last 2 years fishing trips
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	2	3	4	5	6	There should be an immediate change to the commercial length of 12 inches for seabass. This length is absurd and should be at least 15 inches!
Angler	Private Boat	1	3	2	5	4	6	
Angler	Private Boat	1	3				6	
Angler	Private Boat	3	1	2	4	5	6	Recreational fisherman should have same regs as for hire anglers
Angler	Private Boat	1	6	3	4	2		
Angler	Private Boat	1	6	3	4	2	5	
Angler	Private Boat	5	6	3	1	2	4	Prefer longer season even if a lower possession limit
Angler	Private Boat	4						
Angler	Private Boat	3	2	1	5	4	6	Simple so it's easy to manage
Angler	Private Boat	5	6	3	1	4	2	Would like to catch fish to eat longer in the season
Angler	Private Boat	3	2	6	1	4	5	For hire boats shouldn't be able to keep more fish than the rec angler. The fishery belongs to the people and not the buisnesses
Angler	Private Boat	4	3	5	1	5	6	
Angler	Private Boat	1	3	2	4	5	6	Shorter season allowing the fall to regenerate the stock
Angler	Private Boat	3	1	2	4	5	6	
Angler	Private Boat	1	3	2	6	5	4	

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Angler	Private Boat	1						sea bass are temp. sentitive, keepers are gone after water warm,s up and breeding ends
Angler	Private Boat	1	2	3	4	5	6	
Angler	Shore	1					6	For hire ships should not get any special treatment. Keep the regs the same for all. Require bigger fish to be taken to allow more bigger fish over time.
Angler	Shore	6	5	1	3	2	4	
Angler	Private Boat	5	1	6	4	3	2	
Angler	Private Boat	3	2	1	5	4	6	16 1/2 will be very difficult to catch. It will hurt and kill trying to catch them
Angler	Private Boat	1						
Angler	Private Boat	1	2	4	3	5	6	I want recreational limits to stay like last year and obtain your recommended 10% by cutting the commercial black sea bass quotas , or require commercial harvest by rod and reel only for commercial black sea bass. This would change the whole value of the fish itself and it would raise both more recreational interest in the species which we all know can generate millions of new money all year long and could be a Life Saver to a hurting party boat fishing community.
Angler	Shore	1						
Angler	Private Boat	3	1	2	6	4	5	
Angler	Private Boat	1						Your data is a hot mess. Bags should be higher.
Angler	Shore	6	5	3	1	2	4	
Angler	Private Boat	1	2	3	4	5	6	I would prefer larger fish anyway, plenty of 17+" fish especially early season. The higher the option number, the more difficult for anglers to keep track and difficult to enforce effectively.
Angler	For-hire Boat	1	3	2	6	4	5	I feel all recreational anglers should be allowed the same amount of fish regardless of charter, shore, or private boat. On another note, with the number of Black Sea bass that are around (bordering on being a nuisance) any reduction from the pathetic 5 fish limit will most likely cause a reduction in effort and a reduction in charters for a directed Black Sea bass fishery.
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1						
Angler	Private Boat	1	5	4	3	2	6	Option 1 simple to remember, easier enforcement. Option 5 gives rec anglers a longer season, allows Sea Bass caught as a by-catch while Tog fishing in the fall to be kept.
Angler	Private Boat	1						

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Angler	Private Boat	1	2					
Angler	Private Boat	3	5	6	1	2	4	
Angler	Private Boat	4	6	1	2	3	5	
Angler	Private Boat	4	1	2	3	5	6	
Angler	Private Boat	2						
Angler	Private Boat	3	4	2	1	6	5	
Angler	Private Boat	2	1					
Angler	Shore	6	1	4	5	2	3	Looking the options and objects to keep the fish abundant for years to come options 6 offers best options to due so by limiting the take of private anglers during the heaviest part of the vacation season. There is no data to support 100% yet based on the volume of activity on the Cape during summer months this could assist with lower catch numbers and keep species healthy for not only anglers but that of the food cycle.
Angler	Private Boat	1	2	3	5	4	6	Simple is better. Raise the size limit for everyone.
Angler	Private Boat	1	4	5	3	6	5	
Angler	Private Boat	1	3	2	6	4	5	willing to increase size for more fish
Angler	Private Boat	2	3	1				I don't believe that charter boats deserve more fish. Keep it even across the board.changing bag limits thruout the season gets confusing and easier for people to abuse
Angler	Private Boat	1	2	3	4	5	6	The more complicated the rules are, the more likely are anglers to violate them by pure chance. Keep it simple.
Angler	Private Boat	1	2	6	3	5	4	
Angler	Shore	2	3	4	1	5	6	
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	5	2	6	3	1	4	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	6	3	4	5	2	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	4	3	6	1	5	2	Want to fish as long as possible into the season
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	3	1	2	5	6	4	I typical fish till the mid to end of Sept. and option 3 is my preferred option.
Angler	Private Boat	1	3					Equity, consistency, parsimony, logic
Angler	Private Boat	1	2	3	4	5	6	Balance rights of recreational and commercial fishery

Attachment 3.

Angler	Private Boat	1					6	
Angler	Private Boat	1	2	3	6	4	5	As a recreational angler I want a s long a season as possible with the ability to harvest a worthwhile catch of fish considering fuel costs etc.
Angler	Private Boat	1	6	2	3	4	5	Limits.
Angler	Private Boat	6						Longer season
Angler	Private Boat	2	1	3	5	4	6	
Angler	Private Boat	5	6	1	3	4	2	Length of open season important
Angler	Private Boat	1						Why give any breaks to the “For Hire” industry. That’s crap. They are always allowed more and shorter fish. Again crap! I’ve got $16k invested and get screwed by the authorities that ALLOW welfare on the water ! Again Crap !
Angler	Private Boat	5	6	1	2	3	4	Would like the option of taking home a fish later in the season if I can get out.
Angler	For-hire Boat	1	2	3	4	5	6	Keep it simple.
Angler	Private Boat	1	3	4	2	6	5	
Angler	Private Boat	3	1					
Angler	Private Boat	5	4	1	2	3	6	Option 6 is a lot to keep track of.
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	3	1	2	6	4	5	
Angler	Shore	1						
Angler	Private Boat	3	1	2	4	6	5	Recreational anglers deserve the same access as for higher vessels.
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	3	1	2				Having more liberal regs for 'for hire' vessels is insane!!! They are out there nearly every day often twice a day depleting fish stocks for money. You should be ashamed!
Angler	Private Boat	3	1	2	4	6	5	I mainly fish fit Black Sea bass may 20 through June 30 so option 2 works best for me. I don’t know why y’all always put commercial and for hire limits higher.
Angler	Shore	6	5	2	4	3	1	I personally only would possess a keeper-sized fish that was fatally hooked. I prefer the option to have a longer season because they are active from shore into early October. I generally catch-and-release the seabass I catch. I just enjoy catching them as they are a beautiful fish that put up a bit of fight on light tackle.
Angler	Private Boat	1						
Angler	Private Boat	2	3	1	4	5	6	Allows a reduction in harvest with the least impact to for hire boats. I would also hope that the commercial regulations are revised as well and are more restrictive than recreational.

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Angler	Private Boat	1	3					
Angler	Private Boat	1	3					
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	1	2	4	6	3	6	
Angler	Private Boat	3	2	5	4	1	6	
Angler	Private Boat	3	2	1	4	6	5	I only make a small number of trips per year and would like to be able to retain 4 keepers on those trips.
Angler	Private Boat	1	3					At least 4 fish limit most important factor, otherwise not worth cost of going out
Angler	Private Boat	1	3	2	4	6	5	I believe that there should be no difference between for hire and private operators. Also in favor of the larger fish length limit. The more time we allow for reproduction the better
Angler	Private Boat	1						four good fish per trip is minimum to make fun and justify effort and expense IMHO
Angler	Private Boat	1	3	2				Fuel prices are so high that I want to be able to keep as many fish that I'm allowed
Angler	Private Boat	1						
Angler	Private Boat	1	2	3	4	5	6	While fishing other species were still catching sea bass which means plenty of fish including the shorts thrown back
Angler	Private Boat	5	6	2	4	3	1	Take less fish, 2 is enough
Angler	Shore	6						I normally fish at the canal, the most bite is after September
Angler	Private Boat	1	2	4	3	6	5	
Angler	Private Boat	6	1	2	3	4	5	I like the opportunity to fish into October.
Angler	Private Boat	3	1	4	6	5		
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	6						
Angler	Private Boat	3	2	1			6	For hire grab all they can and go out everyday in season
Angler	Private Boat	6	5	1	2	3	4	i primarily fish in the fall.
Angler	Private Boat	1	2	4			5	Not worth going out fishing for 2 fish.
Angler	Private Boat	3	2	4		5	6	Black Sea bass is a great option for early season, as we can fish for striped bass and tuna later in the summer. Therefore, I want to favor early season fishing for Black Sea bass.
Angler	Private Boat	1	2	4	3	5	6	
Angler	Private Boat	1	2	4	3	5	6	6 is to complicated. I think the easier regulations can be the more likely you'll get compliance. My experience is anglers want to be able to fish while preserving the stocks for the future.

Attachment 3.

Angler	Private Boat	5	6	1	2	3	4	multiple numbers of fish per a year won't be followed by recreational fishermen, best to stick with one for the whole season. Aug. is to early to end the season here on the cape
Angler	Private Boat	1						
Angler	Private Boat	1	3	2	4	5	6	Higher quota per angler most important
Angler	Private Boat	1		2	3	4		
Angler	Private Boat	1	2	4	6	3	5	
Angler	Private Boat	1	2	3				
Angler	Private Boat	6	5	3	2	4	1	longest season
Angler	Private Boat	1						
Angler	Private Boat	1	2	4	3	5	6	
Angler	Private Boat	1	3	2	6	4	5	
Angler	Private Boat	1	2	4	3	6	5	
Angler	For-hire Boat	4	5	6	2	3	1	
Angler	Private Boat	5	6	3	4	1	2	Extended season is preferred
Angler	Private Boat	1	3	2	6	4	5	Minimal change. Charter boats have no right to additional fish
Angler	Private Boat	3	6	5	2	4	1	I prefer limiting to lower possessions that allow recreational fisherman to keep a catch for dinner without waste.
Angler	Private Boat	2	1	3	6	4	5	
Angler	Private Boat	2	1	3	4	6	5	For hire vessels should not get any preferences, especially a higher bag limit.
Angler	Private Boat	2	1	3	4	6	5	For hire vessels should not get any preferences, especially a higher bag limit.
Angler	Private Boat	1	4	5	6	2	6	
Angler	Private Boat	1	3	2	4	6	5	
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	1	2	4			5	

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Angler	Private Boat	5	2	1	3	4	6	I do not like option 6 as it changes the limit at different times of the season. As I fish in different states, it is easier to keep track when the limit is consistent throughout the season. I like option five best , while it may have a lower catch limit, it has a longer season. The longer season is preferable to me as we only ever keep as much fish as we can eat within a few days, so the lower limit is less of an issue. I like options 2 & 1 as they keep the limit the same for both private boats and for hire boats. I have always found it frustrating when party boats can take so much more that private boats when they spend considerably less for the privilege of doing so. Factoring in the cost of the boat, fuel, maintenance and transportation (we trailer), catching fish off your own boat makes it the most expensive fish money can buy; but the experience of doing it with my son is priceless.
Angler	Private Boat	2	1	3				With the price of fuel for recreational boats to get out to fish for 1 or 2 sea bass cost too much. It cost me 50 in fuel for these regulations. Unless I bring 3 people on the boat it's not reasonable for me to enjoy fishing for sea bass. Stop the draggers.
Angler	Private Boat	1	2	3	4	5	6	Bigger fish (16.5”) gives the species more time to breed
Angler	Private Boat	5	3	6				option 5 gives the longest season
Angler	Private Boat	3	2	5	6		4	Option 4 closes the fisheries during summer when bottom fishing when other fishing is slow
Angler	Private Boat	5	6	3	4	2	1	My choice is based on the chance to take a fish home in the Fall
Angler	Private Boat	2	3	1	5	6	4	
Angler	Private Boat	4	1	2	3	5	6	The fishing was absolutely terrible last year. Someone is coming in and dragging or something. This is what needs to be looked in to. Not the private fisherman. What about the surrounding states? Are they also being required to reduce their numbers?
Angler	Private Boat	1						This is the least impactful choice for me. All these are silly considering the size limit that is imposed on commercial fishermen is much lower.
Angler	Private Boat	6	5	3	2	4	1	I prefer a longer season as I try to get the most out of my investment in my boat.
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	6	5	3	2	1	4	I think that stretching the season into October maximizes angler days on the water, an incentive to fish later in the season and keep even one of the lunker sea bass that we always catch while fluke fishing at that time of year bass that
Angler	Private Boat	1						
Angler	Private Boat	1	2					

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Angler	Private Boat	1	3	2	4	5	6	Why pennalize private vs for hire and commerical? Why pennalize recreational vs commerical. At 14 in c ommerical it would take about 12 - 15 rec trips to equal the effect of 1 commerical trip assuming the rec boat fishes 3 people.
Angler	Shore	4	5	2	3	1	6	
Angler	Private Boat	1	3					Let the fish grow, I like the open season dates , 4 is reasonable , same for rec and for hire
Angler	Private Boat	3	1					
Angler	Private Boat	1						
Angler	Private Boat	1	6	3				Why are we cut and New Jersey can keep 10 fish of smaller size?
Angler	Private Boat	1	2	3	4	5	6	I don't think for hire should get a larger limit then private. A one or two fish limit wouldn't even be feasible to leave the dock with the cost of diesel. Time to sell the boat and fishing gear and buy a set of golf clubs.
Angler	Private Boat	1	2	3	4	5	6	With cod fishery in decline sea bass now better off leaving the boat tied to the dock. STOP COMMERCIAL FISHING!!
Angler	Private Boat	1	2	3	6	4	5	Simpler system to apply and police, allows a good number of fish to be kept on each trip and allows fishing throughout the season.
Angler	Private Boat	2	1	3	4	5	6	simple rule, minimal change
Angler	Private Boat	1						Hire or private should have the same size and bag limit. Private anglers should not subsidise others Business with reduced sizes and bag limits
Angler	Private Boat	6	5	1	2	3	4	later season
Angler	Private Boat	5					6	Option 5 will allow for quicker and more accurate inspection of cull for rec. and commercial. Also extended season into October should hopefully reduce pressure on the fall striper fishery. I personally believe a cessation of harvesting sea bass should go into play but I am aware there's a bigger picture.
Angler	Private Boat	6	5	3	2	1	4	Fishing for black sea bass has been quite good late in the season (into October) in recent years. Extending the season while reducing daily limits would provide recreational anglers valuable opportunities to fish for and keep bass in the fall.
Angler	Private Boat	1	2					cost of the trip to make it worth while
Angler	Private Boat	2						
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	6	5	1	2	3	4	Prefer to have a longer fishing season over keeping more fish per trip.
Angler	Private Boat	5	6	3	2	1	4	as a local kayak fisherwoman, I like a long season.
Angler	Private Boat	1	2					

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Angler	Private Boat	2	1	3	5	4	6	Keep it simple, and for hire vessels should not be taking more. If anything, they should take less.
Angler	Private Boat	6	5	4	3	2	1	There are sea bass everywhere and shouldn't be a reduction
Angler	Shore	2	4	5	3	1	6	
Angler	Private Boat	1	2	3	6	5		Effort and fuel consumption. It's more economical to make one trip and catch 4 fish than to make two trips to catch 4 fish
Angler	Private Boat	1	2	3	5	6	4	
Angler	Private Boat	2	3	1	4	6	5	
Angler	Shore	5	6					
Angler	Private Boat	1	6	5	3	2	4	I prefer keeping the season as long as possible
Angler	Shore	1	2	6		3	5	
Angler	For-hire Boat	2	3	1	4	5	6	keep it Simple if you want people to be able to remember !
Angler	Private Boat	1						
Angler	Private Boat	1						
Angler	Private Boat	1	2	4	3	5	6	
Angler	Private Boat	5	6	4	3	2	1	I would prefer a longer season with fewer fish allowed per trip
Angler	Private Boat	1	3	4	2	6	5	I would rather have a larger size limit and stay at 4 fish. There are so many small fish, later in the season, it seems to me like they reproduce fine and grow quickly
Angler	Private Boat	1	3	2	4	5	6	4 fish recreational limit helps justify taking the boat out and offsetting gas cost.
Angler	Private Boat	2						
Angler	Private Boat	1	2	3	4	5	6	I would rather have a higher limit 4 fish at 16.5 " as I always try to keep bigger fish for eating. Also I think it is completely unjustifiable that charter boats should be treated differently than rec fishermen- a limit should be a limit
Angler	Private Boat	1	3	2	4	5	6	
Angler	Private Boat	6						I fish primarily for sea bass early and late in the seasons. Option 6 gives me a longer season to fish for them as well as lowers the retention limits at the busiest part of the summer, helping the population.
Angler	Private Boat	1	2	4	3	5	6	Split seasons are very complicated for a recreational angler. 3 or less Fish is hardly worth the price of fuel to get out to a spot and fish.
Angler	Private Boat	1	5	6	2	3	4	
Angler	Private Boat	4	1	2	3	5	6	simplicity (can't remember too many dates); close catch limit parity between rec and for-hire
Angler	Private Boat	6	1	3	4	5		

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Angler	Private Boat	2	1	3	5	4	6	
Angler	Private Boat	3						
Angler	Private Boat	6	5	1	4	2	3	
Angler	Private Boat	1					2	I'm for keeping larger fish and releasing sea bass under 16.5". I also want to keep at least 4 fish every time I go. I would like to see the start date be the last Saturday in May to allow it to extend longer into Sept.
Angler	Private Boat	5	6	3				
Angler	Private Boat	5	6	3	1	2	4	Longer season is best
Angler	Private Boat	5	6	3				
Angler	Private Boat	5	6	1	2	3	4	We would like the longest season that can keep population healthy, above all else healthy population most important
Angler	Private Boat	1	5	3	6	2	4	I think possession limits should be lower depending on how many people are on the boat tor hire. Party boat fishing boats are placing to much pressure on the sea bass stocks.
Angler	Private Boat	3	1	6	2	4	5	You can catch a keeper BSB only from the boat, but there is no sense to launch a boat for 3 fish
Angler	Private Boat	6	1	2	3	5	4	Late season possible to keep fish when toggin.
Angler	Private Boat	1	2	3	6	6	6	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	2	4	3	5	6	I do not comprehend the data. There's an overabundance of BSB in the areas I fish. So much so, that more often than not, we only keep fish larger than 20"
Angler	Private Boat	2	3	1	4	5	6	I have seen significant increase in by catch of BSB past 5 years and support increased harvesting
Angler	Shore	2	3	6	1	4	5	
Angler	Private Boat	1	3	2	4	6	5	There are so many sea bass out there. I do not know why there could not be a limit of 5 fish from May through September at 17 inches. The restriction has discouraged many private boaters from going out and enjoying fishing especially with the high cost of fuel and boat maintenance. The restriction is not favorable for shore and private boaters to going fishing anymore. .
Angler	Private Boat	2	3	6	4	5	1	
Angler	Private Boat	2	4	3	1	6	5	I only fish for Black Sea bass 1-2 times per year and would like to keep the greatest number of fish

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Angler	Private Boat	3	1	6	2	4	5	always going after the private guy, how about going after the draggers. i dont want to hear thats their living, enough of that bullshit
Angler	Private Boat	1	2	3				
Angler	Private Boat	1	2	3	4	5	6	The more changes you make to the number of fish allowed in a season, the more risk for being out of compliance. We would prefer the size be increased to 17". Have more crack down on illegal fishing. We have seen many boats out there fishing out of season, or catching way more than allowed. Private anglers fishing with family is limited to what we can catch, but for-hire boats can have 20 people on their boat each getting their limits. Who is depleting the fishery then, those that have 2 trips per day with a total of 40 people catching their limits daily. Or the weekend fishing trip with family?
Angler	Shore	2	1	3	4	5	6	
Angler	Private Boat	1	2					
Angler	Private Boat	4	1	3	6	2	5	
Angler	Private Boat	3	1	2	6	5	4	I cannot get out that often usually due to weather and work just would get a few to take home
Angler	Private Boat	1	2					Have there been any reduction to commercial limits? I believe that would be more effective than continuing to reduce the amount of fish taken by recreational weekend fishermen.
Angler	Private Boat	2	1	3	4	5	6	
Angler	Shore	6	1	2	3	5	4	
Angler	Private Boat	1	2	6	5	4	3	
Angler	Private Boat	1	2	4	3	5	6	
Angler	Private Boat	1	5	2	4	3	6	It is patently unfair to separate the for hire and the private vessel. The for hire I consider to be a commercial enterprise since they are earning a living fishing. It is apparent to me that they have bound together to lobby for themselves and the truly recreational angler is being saddled with the burden of their interest. The Option six of one fish during prime fishing months in the Commonwealth is a cruel joke. One fish for the expense of fuel, tackle, bait is truly a cruel joke

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Angler	Private Boat	1	2	3	4	5	6	Option 1 is the best. a. I don't keep 16 inch fish any way b. it's simple. Option 2 is not as good as 1 but it's still simple. the other options just get more and more complicated as they progress. It's also very frustrating when commercial or for hire vessels get to keep larger or more fish. It makes it seem like it's not really about protecting the fishery.
Angler	Private Boat	1	4	6	3	2	5	
Angler	Private Boat	1	6	3	4	2	5	
Angler	Private Boat	6	5	4			1	Option 6 fair and equitable. The recreational community is driving the catch. For hire is a small percentage.
Angler	Private Boat	6	3	1	2	5	4	
Angler	Private Boat	6	3	5	4	2	1	
Angler	Shore	6	5	1	4	2	3	
Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	1	2	3	4	6	5	I would prefer a higher minimum size and longer season I personally do not keep any fish under 20"
Angler	Shore	2	1	3	6	5	4	
Angler	Private Boat	6	3	2	1	4	5	
Angler	Private Boat	1	2	3	4		5	
Angler	Private Boat	2	1					
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1						bag limit and season remains the same
Angler	Private Boat	2					3	I probably caught about 300 black bass on the Sound in 2022. I would bet only 10 of them were keepers. The stock needs to be managed to abundance and to able breeders.
Angler	Private Boat	1	2	3	4	5	6	Based on most recent NOAA data, Option 1 for recreational fishing would have no or minimal impact on the biomass of Black Sea Bass. Recreational fishing has long been a valued tradition for Massachusetts residents which has also substantially contributed to the local economy. The adoption of Option 1 in my opinion is a most reasonable choice.
Angler	Private Boat	2	1	3	4	5	6	
Angler	Shore	6	2	3	1	5	4	
Angler	Private Boat	5	6	1	2	4	3	
Angler	Private Boat	1	2	4	3	5	6	

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Angler	Private Boat	2	1	3	4	5	6	
Angler	Private Boat	3	2	1	4	5	6	
Angler	Private Boat	1	3	3	4	5	6	Feel that early season best due to cooler water temps
Angler	Private Boat	1	3	2	4	6	5	Option #4& #5 & #6 seem to favor charter boats with 4 fish all summer.
Angler	Private Boat	1	2	6	3	5	4	I really do not feel a 10% reduction is warranted. I rarely keep a fish under 18" so Option 1 is my preference, but since I do tog fish in the fall, a couple of the later season options are OK too.
Angler	Shore	3	2	1	4	5	6	
Angler	Private Boat	1	3	4	5	6		
Angler	Private Boat	1	3	2	5	5	6	
Angler	Private Boat	6	5	4	1	2	3	Option 6 allows me to keep the bycatch of black sea bass during fall tautog season, and being a small boat angler it is hard for me to get off shore south of nomans consistently during the summer months.
Angler	Private Boat	5	6	3	2	1	4	I don't have issue with reducing catch limits however only if that comes with an extended season. The bulk of a trips (private vessel) catch is released due to the abundance of "short" females.
Angler	Private Boat	1	2	3	4	6	5	
Angler	Private Boat	1	3	2	4	6	5	I give most of the fish I catch to elderly family. Reducing bag limiits will impact those less fortunate.
Angler	Shore	3	2	1	4	5	6	
Angler	Private Boat	1	2	4	6	3	5	Going out to only catch 1 or 2 Black Sea bass is pointless. It does not equal the gas, time, money, and other resources us fishermen put into it. Therefore, of the previous options, Option 1 is the best; catching 4 sea bass for almost 4 months is the best option.
Angler	Private Boat	2						Reducing the rec catch to 1 fish for the summer to achieve a separate For-hire bag limit proposal was a mistake.
Angler	Private Boat	2	5	4	1	3	6	
Angler	Private Boat	1	3	2	5	6	4	
Angler	Shore	4	5	3	2	1	6	rules should be made that support both for hire, while protecting the fisheries, and have simple rules to remember to reduce accidental violations
Angler	Private Boat	1						
Angler	Private Boat	5	6	3	1	2	4	

Attachment 3.

Angler	Private Boat	2	3	1				I see no reason that for hire vessel limits are greater than individuals. Limits for commercial anglers in private boats are too large also: Where I fish, you see a few anglers with many sea bass in their nets.
Angler	Private Boat	5	6	3	1	2	2	We prefer as late a season as possible. We only keep one to two fish per trip for personal consumption.
Angler	Private Boat	6	5	3	1	2	4	I would just prefer to be able to fish longer into the season for keeper fish even if the limit is reduced.
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	1	2	3	5	4	6	
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	3	1	6	2	4	5	Sea bass fishing is one of the first fish we can target in the early season, and we have other species to fish for later in the season
Angler	Private Boat	1	2	3	4	5	6	
Angler	Private Boat	3	1	2	4	5	6	
Angler	Private Boat	6	5	3	1	2	4	
Angler	Private Boat	6	5	4	1	2	2	
For-hire	Private Boat	2	3	1	4			Trying to keep the take balanced
For-hire	Private Boat	1	2	3	4	5	6	Keep things simple.
For-hire	For-hire Boat	5	6	4	3	1	2	
For-hire	Private Boat	2	1	5	1			
For-hire	For-hire Boat	6	5	1	2	3	4	
For-hire	For-hire Boat	1	3		4	5	2	
For-hire	For-hire Boat	1						Charter or private should all be the same 4 @ 16.5"
For-hire	For-hire Boat	4	2	5	1	5	6	I believe options with the least variance in size and season will have the most impact.
For-hire	For-hire Boat	6	5					Keep the season open into October
For-hire	For-hire Boat	6	5	3	2	1	4	Looking for the greatest number early on and would like the season to last until Labor Day.
For-hire	For-hire Boat	5	6	4	1	2	3	Customers won't pay for anything less than 4 fish. It's hard now to book a trip for 4.
For-hire	For-hire Boat	1	5	6	4	2	3	
For-hire	For-hire Boat	1	2	3	6	5	4	Support for-hire business
For-hire	For-hire Boat	4	6	5	3	1	2	
For-hire	For-hire Boat	2	1	5	4	3	6	Keep it simple and conservative

Attachment 3.

For-hire	For-hire Boat	5	6	3	2	4	1	South and east of cape cod deserves to retain fish in the fall as it is a later season in this zone. Also prefer simple regulations in terms of size and bag.
For-hire	For-hire Boat	6	1					
For-hire	For-hire Boat	5	4	3	6	1	2	
For-hire	For-hire Boat	5	6	3	4	1	2	
For-hire	For-hire Boat	1	4	4	4	3	6	
For-hire	Private Boat	1	2	4	3	5	6	This is a very active fisheries that needs no reduction. Why not increase the commercial size from 12.5 up to help maintain stock.
For-hire	For-hire Boat	1	5	5	4	2	3	I have customers that travel from NY, NJ, and Conn. they are not willing to drive to Buzzard Bay for three or less Sea Bass.
For-hire	For-hire Boat	2						
For-hire	For-hire Boat	5	4	6	3	2		
For-hire	For-hire Boat	1					6	Sea bass are too abundant and must be thinned out. The sea bass are pushing the scup and fluke out, they cant compete with the sea bass
For-hire	For-hire Boat	6	5	4	3	1	2	
For-hire	For-hire Boat	6	5	4	1			
For-hire	For-hire Boat	6	5	4	1	2	3	Your making it hard to sell charters if the limits are restricted more then they have to be.
For-hire	For-hire Boat	6	4	5				Got to make it worth while for cusyomers
For-hire	For-hire Boat	6	5	4	3	2	1	For hire prefers lager bag limit and recreational anglers would prefer a longer season
For-hire	For-hire Boat	4	5	1	2	3	6	
For-hire	For-hire Boat	6	5				1	
For-hire	For-hire Boat	6	1	4	5	3	2	There are tons of fish. People pay me to put fish in the cooler. Any reduction in quantity ruins my business. This change is about accounting, not protecting the fish. A longer season would be welcome as we often catch nice fish in the fall(a smaller limit would be nice in an extended fall).
For-hire	For-hire Boat	6	5	4	3	2	1	
For-hire	For-hire Boat	6	5	3	2	1	4	I have already booked charters for this season. I rely on sea bass in the later part of the year.
For-hire	For-hire Boat	6						Need to make it worth while for customers
For-hire	For-hire Boat	6	5	4	1	3	2	
For-hire	Private Boat	6	1	2	5	4	3	
For-hire	For-hire Boat	5	6				3	

Attachment 3.

For-hire	For-hire Boat	6	5	1	4	2	3	
For-hire	For-hire Boat	6						Survival of business
For-hire	For-hire Boat	6	5	4	3	1	2	There are more sea bass in our waters than there has ever been. The quota needs to be increased for our charter business's to bring more revenue to our state.
For-hire	For-hire Boat	6	5	4	1	2	3	
For-hire	For-hire Boat	6	5	4				Customers travel and stay overnight to fish with us..we need to have a product
For-hire	For-hire Boat	6	5	4	1	2	3	The for-hire fleet can not economically withstand another decrease in limits. Option 6 also allows recreational fisherman to catch sea bass as by catch while fishing for tautog in the fall.
For-hire	For-hire Boat	6	5	4	3	1	2	for-hire 3 fish limit I am out of business, would you drive from PA MD VA NC NY, to catch 3 fish?? Some make the trip for 4, who knows for how long.
For-hire	For-hire Boat	5	6	1	2	3	3	
For-hire	For-hire Boat	5						
For-hire	For-hire Boat	6	5	4	1	3	2	Option 6 allows the for hire fleet to get what they need to keep customers coming in this collapsing economy as well as extending the season for the recreational anglers into the fall allowing for the by-catch to be harvested during Tautog Season.
For-hire	For-hire Boat	6	1	4	5	3	2	
For-hire	For-hire Boat	3	2	1	6	5	4	Preference for no divisions between recreational and charter fishermen.

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MAURA HEALEY, Governor | KIMBERLEY DRISCOLL, Lt. Governor | REBECCA TEPPER, Secretary | RONALD S. AMIDON, Commissioner | DANIEL J. MCKIERNAN, Director

MEMORANDUM

TO: Marine Fisheries Advisory Commission (MFAC)

FROM: Daniel J. McKiernan, Director

DATE: March 16, 2023

SUBJECT: **Proposal for Rule Making to Adjust Recreational Cod and Haddock Limits**

This memorandum serves to inform the MFAC of my intention to use my emergency regulatory authority to implement the federally approved recreational Gulf of Maine (GOM) cod and haddock and Georges Bank cod limits for the upcoming federal fishing year of May 1, 2023 – April 30, 2024 (FY23). The use of my emergency authority is necessary here to ensure state rules can be nimbly implemented to align with the final implementation of federal rules for FY23. Having corresponding state and federal limits for these federally managed species will allow recreational fishers in state waters to have the same limits as those fishing in adjacent federal waters and for recreational fishers to possess and land fish in Massachusetts that were taken in the federal zone.

Anticipated Federal Limits

At its January 2023 business meeting the New England Fishery Management Council approved motions to adjust the recreational fishing limits for these stocks for FY23. These changes are described in Table 1 below with the new approved limits in bold faced font and approved amended limits in redline strikethrough.

Stock	Open Season	Size Limit	Bag Limit
GOM Cod	**September 1 – October 31** ~~**September 1 – October 7**~~ ~~**April 1 – April 14**~~	≥22”	1-fish
GOM Haddock	May 1 – February 28 April 1 – April 30	**≥18”** ~~**≥17”**~~	**15-fish** ~~**20-fish**~~
GB Cod	**May 1 – May 31** **September 1 – April 30** ~~**August 1 – April 30**~~	**≥23”** ~~**≥22” to ≤ 28”**~~	5-fish

Anticipated State Rule Making Timeline and Process

I cannot accommodate a normal rule making schedule and have complementary measures in place for May 1, 2023. Therefore, I intend to use my emergency rule making authority. If federal rules are delayed, state emergency measures will not go into effect before federal rules are implemented to ensure consistency between state and federal waters. Emergency regulations are effective upon filing and remain in place for a period of 90-days before they expire.

During this 90-day period, DMF will conduct the process necessary to codify the emergency regulations on a more permanent basis. This includes holding a public hearing and public comment period, likely throughout May and into early June, and then making a final recommendation to the MFAC at their June business meeting. If the final recommendation is approved by the MFAC the regulations will remain in effect; if the recommendation is not approved by the MFAC the emergency regulations will expire after 90-days and revert back to the current rules.

Given this schedule, I will not be able to solicit public comment on the emergency regulation before they go into effect. While not ideal, I am comfortable with this approach, as these rules have to move through the federal rule making process and DMF has a very limited ability to do something different than the federal government.

MarineFisheries
Commonwealth of Massachusetts

Shellfish Advisory Panel
March 2, 2023 Meeting Summary

This document serves as a brief summary of the March 2, 2023 Shellfish Advisory Panel (SAP) meeting. This meeting was held virtually via Zoom. All meeting materials are available on the SAP's past meeting website and a recording of the full meeting is posted to DMF's YouTube channel.

Update on Bulk Tagging Considerations

DMF informed the SAP it would not move forward with a pilot program to allow all shellfish aquaculturists to bulk tag market bound shellfish. The allowance for bulk tagging by so-called "grower-dealers"—shellfish aquaculturists who are also wholesale dealers and primary buyers purchasing their own reared shellfish—would remain in effect. DMF determined the negative impacts of expanding bulk tagging opportunities were disproportionate to the anticipated benefits. Specifically, DMF was concerned it would shift the enforcement and compliance burden from commercial fishers to seafood dealers; weaken public health protections afforded through shellfish traceability and recall; and result in larger quantities of shellfish potentially subject to embargo for non-compliance. Members of the SAP expressed frustration that DMF did not consult the SAP's Bulk Tagging Sub-Committee before closing the door on expanding bulk tagging allowances and requested the agency reconsider this decision. DMF stated it would convene the Bulk Tagging Sub-Committee to further discuss the issue and consider a more narrow pilot program to assist in the development of potential industry-wide standards that could address DMF's concerns regarding bulk tagging.

ISSC Biennial Meeting Proposals

DMF briefed the SAP on the National Shellfish Sanitation Program (NSSP) and Interstate Shellfish Sanitation Conference (ISSC). The ISSC is a conference of state regulatory officials (shellfish resource and public health agencies), federal regulatory officials (including US FDA), the shellfish industry (harvesters, growers, and dealers), and foreign governments. The ISSC provides a formal structure to ensure states are establishing and implementing regulatory programs that conform to the NSSP and a process for government and industry to settle disputes regarding the application of NSSP. The ISSC is scheduled to hold its biennial meeting in late March 2023. DMF then provided an overview of some of the proposals that would be addressed at this upcoming meeting. Relevant to Massachusetts were proposals addressing shellfish sanitation and classification—particularly with regards to marinas, mooring areas, and wastewater treatment plants—as well as marine biotoxin management.

Surf Clam Management Update

DMF has been involved in discussions concerning the ongoing challenges where state regulated commercial fishing activities—particularly hydraulic surf clam fishing—may be constrained by municipal conservation commissions ("ConComs") under the Wetlands Protection Act. This issue came to the forefront several years ago as the result of Provincetown enforcing local ConCom regulations restricting hydraulic fishing off Herring Cove. While commercial fishing interests have avoided fishing in these waters since, a surf clam fisher recently filed a Notice of Intent ("NOI") with the town and the Department of Environmental Protection to fish in this area. DMF encouraged the applicant to rescind the NOI filing given concerns about the precedent the issuance of an NOI may set for the surf clam fishery state-wide. DMF has been working closely with DEP to determine how to protect legacy commercial fisheries, a manner that allows DEP to continue to address activities that may alter wetlands

resource areas.

Sub-Committee on Municipal Aquaculture License Site Transfers

The Chair of SAP (Dan McKiernan) called for the formation of a sub-committee to examine how municipalities currently manage shellfish aquaculture license site transfers. The sub-committee will not weigh in on home rule authorities. However, DMF will compile and the sub-committee will review all municipal regulations governing aquaculture license site permitting and transfer rules and engage with municipal officials and industry members on what may (or may not) be working. DMF sought to appoint Bill Doyle, Dale Leavitt, Amy Croteau, and Renee Gagne to the sub-committee and welcomed additional volunteers. It was determined that Ron Bergstrom would sit in for Renee Gagne. Josh Reistma, Alex Hay, and Mike DeVasto also volunteered to be on the sub-committee. DMF would make official sub-committee appointments in advance of the next SAP business meeting.

Upcoming Meetings

The SAP business meeting will be held on April 27, 2023 at SMAST East from 4PM to 7PM. SMAST East is located at 836 South Rodney French Blvd, New Bedford, MA 02744.