

**From:** [Robert Wilsterman](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass  
**Date:** Thursday, March 19, 2020 1:28:44 PM

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Fisheries management folks,

I have lived in coastal Massachusetts for 50 years with the exception of my 13 years on active duty with the US Navy. I moved to Marshfield with my family at age 14 and began fishing our beautiful coast almost immediately.

Like everyone else I have watched the Striped Bass population rebound and then crash. I have numerous acquaintances who pretend to be commercial fishermen so as to write off fishing expenses.

I know there are folks who actually make their living from fishing for Bass but I fear they are the minority of commercial permit holders.

I favor the proposal put forth by the Stripers Forever people to gradually and compassionately end the commercial fishery and replace it with a sport fishery.

The value to the Commonwealth of the sport fishery far exceeds the value of the commercial fishery as you are well aware.

Follow the lead of Stripers forever and you will be on the right side of history. Continue to facilitate the wanton slaughter of breeding fish and you will preside over the complete collapse of a once magnificent fishery.

The future of the species is in your hands.

Robert Wilsterman, MD FAAOS  
83 Cumloden Dr  
Falmouth, MA

March 16, 2020

TO: Acting Director Daniel J. McKiernan

Division of Marine Fisheries

251 Causeway Street, Suite 400

Boston, Massachusetts 02114

FROM: Bradford K. Bourque

98 Willard Street

New Bedford, Massachusetts 02744

SUBJECT: Comments on Regulatory Amendments to 322 CMR 6.00, 7.00 and 9.00

Dear Mr. McKiernan,

Listed below are my comments on the above cited regulatory amendments:

1. Recreational Striped Bass
  - a) Approve
  - b) Do Not Approve
  - c) Approve
  
2. Recreational Bluefish – Approve
3. Commercial Stripe Bass
  - a) Approve
  - b) Approve
  - c) Approve
  - d) Approve
4. Commercial Flounder – No Comment
5. Commercial Black Sea Bass
  - a) Approve
  - b) Do Not Approve
  - c) Do Not Approve
6. Commercial Horseshoe Crab - Do Not Approve
7. Commercial Menhaden
  - a) Do Not Approve
  - b) Do Not Approve
  - c) Do Not Approve

- d) Do Not Approve
- e) Approve
- 8. Sand Lance - Approve
- 9. Housekeeping
  - a) Approve
  - b) Approve
  - c) Approve
  - d) Approve
  - e) Approve
  - f) Do Not Approve
  - g) Approve

Thank you for the opportunity to express my thoughts regarding these issues. Please contact me at 774-202-7585 for further clarification if necessary.

Sincerely,

Bradford K. Bourque

Boat License Number MS3622AT

3/15/20

My name is Tim Silva, commercial bass fisherman for over 50 years.

→

I'm against starting the season before June 23. First - There are not ~~the~~ enough people or tourist ~~to get~~ <sup>for the</sup> a supply & demand & price. Two - the most important months are July & August, Three if starting June 1 and the fish don't move into federal waters in July. The season could end the middle of July with no August fish for the public.

→

Leave the season days Monday & Thursday. Several years ago, the fishermen voted those days for most spread to keep the price up. and it has worked.

→

should the quote not be filled by mid August, we should be given an extra day to help fill the quote.

In September, we have nor'easters & hurricanes to deal with, & don't always can get out.

It should be noted it was the fishermen that voted to shorten the number of days to stretch the season out.

→

→ Another note would be to be given another day July 4 + Labor day so there are 2 days supply of fish those weeks. Is striped bass the only Massachusetts fishery close those days?

→ I've been speaking at the state public hearings for 40 years. I hope this letter will mean as much as speaking at the podium.

Thanks for your Time

Timothy J. Siskin

Acting Director McKiernan,

I am writing in regards to the following proposals;

1. I support renewing the pilot program for fluke retention. As a participant last year, it was a useful option that I used on a few occasions especially as the season progressed and the fish were farther from the mainland. On days that I used the program it saved me, on average, 40 gallons of fuel.
2. I support the increased trip limit to 400lbs per day so long as the state is monitoring the quota trend and we will not see a shortened season. I would not support any further increase in the limit during the summer months as I believe it would invite larger vessels into the fishery and hurt our ex-vessel prices.
3. No Opinion on trip limit for hook and line fishery.
4. I support the 7 day a week fluke fishery, however I would prefer 7 days a week beginning on or about October 15th. Based on my records, mid October is when I wasn't able to fish everyday because of the weather so an increase in opportunity will most likely not result in an increase in landings.
5. I would favor the status quo. As a permit holder who does not hold a horseshoe crab endorsement, I understand the interest in creating an incidental horseshoe crab endorsement however I have reservations that this is in reaction to the first time the Horseshoe crab limit has been reached. That being said, if the State does decide to go with an incidental endorsement I would like to see the limit set at a minimum of 100 crabs.
6. I support all proposals to the Black Sea bass regulations pertaining to the Trawl fishery, during both squid and Fluke seasons.

I hope these comments help in the decision making process.

Respectfully Submitted,

Robert Dutra

ATTN: Acting Director Daniel McKiernan

I'm submitting comments regarding the Striped Bass and Bluefish regulation proposals, which follow below. I participate in both the commercial & recreational Striped Bass & Bluefish fisheries. I am also on the Recreational Advisory Panel of the New England Fishery Management Council and have had a seat on that panel for over 10 years; much of the topics here are very similar to issues we have had to work out in the Groundfish fishery.

### **Recreational Striped Bass (322 CMR 6.07) & Commercial Striped Bass (322 CMR 6.07):**

One detail to point out before I go further, is while reading comments it's important to consider there are a significant number of recreational Striped Bass anglers, who typically are not aware of the very small quota of the commercial fishery or the huge release mortality of the recreational fishery, and because of such they tend to be spiteful of the commercial fishery. Often the commercial Striped Bass fishery is blamed for all abundance problems; as we know those ideas are mis-guided and the fishery only has a very small commercial component.

#### **Length limits:**

Increasing the commercial length limit and creating a slot for the recreational fishery is only going to further condense activity of the commercial fishery into certain small areas (and schools of fish), and through a situation that is nearly entrapment, will likely turn some otherwise law-abiding recreational anglers into poachers when they encounter Striped Bass above the slot. The additional logical problem here is that while commercial fishermen do not care if they are making their \$\$ off 28- or 40-inch fish, a recreational angler is extremely motivated to catch and retain "trophy" sized fish. Logically in some sense these regulations are

structured backwards, and the general recreationally-fishing public deserves access to these trophy fish as much as the commercial fishermen do.

Additionally, the mortality rate on large Striped Bass in my experience is very high, ie if I catch one > 48 inches there's a good chance it's going to die anyway. Last, if the commercial fishermen can keep large Striped Bass, and the recreational fisherman can't, it's similarly going to cause spite and increase the motivation for non-commercial fishermen to obtain permits, ie so they can retain the larger fish. The proposed regulations are just not helpful in addressing the needs of the fish or anglers. Last, structuring regulations around an occasional "recreational" fish making it into the commercial market isn't helpful. Very few commercial boats are going to head out onto the water just to catch a fish or two and the limited amount of non-compliance that might occur otherwise is not a problem that requires solving; fin clipping has already greatly diminished this problem (assuming it was a real problem to begin with).

Proposal: What would make more sense is to keep the commercial & recreational fisherman on the same class of fish and do not further pursue a slot (and keep in mind other states have similarly now dropped this idea). **My proposal for length limits would be as follows, recreational boats > 28 inches, and commercial boats (whether or not they are commercially fishing and regardless of commercial days) > 32, no slot, and allow the charter boats who are also have Striped Bass endorsements to fish under the recreational limits only if they have a paying charter on board.** By setting the regulations in this manner, a recreational boat would not be motivated to seek the commercial permit because it would generate a penalty for them in the form of a higher length limit.

### **Commercial Open Days:**

I generally fish at night for Striped Bass, as do others I know. Creating a 24-hour day starting and ending at midnight is a huge detriment to the law-abiding night fishermen, and it breeds non-compliance. The regulations all seem to have been structured around the daytime Cape Cod fishery and not how we fish for them in the waters around Boston and north to the Merrimack River; please consider the rest of the fishermen. On a typical night what we want to do is leave the dock at around 7:00 PM, fish until 5:00 AM, then go in and offload. We can't begin fishing



now until midnight, or alternatively need to start at 7:00 PM and quit at midnight, yet there are no buyers available in our area after 10:00 PM (so essentially to be compliant we only have a half of a night of fishing available to us now).

Proposal: I'm putting these in order of preference. **(1) Put the 2 open days on top of each other so at least we can fish one full night. (2) Change the start/end time to 6:00 PM so we have an opportunity to fish full nights, while others can also fish full days (3) Give us the same bag limit per open period of time but extend the period to ~36 hours, ie 15 fish per boat from midnight Sunday night until noon on Tuesday (4) Create a grace period so when we get off the water just prior to midnight, we are able to possess the fish on land until the buyers become available in the morning.**

### **Circle Hooks:**

Although I have no problem w/ circle hooks for drifting or "dead sticking" natural bait, I do 90% of my Striped Bass fishing by trolling live natural baits. Usually I'm trolling eels, mackerel, or menhaden; circle hooks work terribly for trolling these baits (ie we hook very few of the fish that strike) and with J hooks we rarely see a fish hooked other than in the jaw when fishing in this manner. **Please make exemptions for trolling, at least for live bait.**

### **Gaffs:**

This is very simple, there is no reason to ever gaff a striper – I have been using a net large enough to scoop up a 50 LB striper (and probably any striper that has ever swam) for the last 20 years and it works at least as well as a gaff, while also not harming the fish. There is absolutely no need to gaff a Striped Bass of any perceived size.

### **Recreational Bluefish (322 CMR 6.18)**

### **Split Regulations, Party/Charter 5 fish, Private boats 3 fish:**

On the Recreational Advisory Panel we have debated this concept, which has been brought up about every year for the 10+ years I've been on the panel and we have never voted in favor of such a recommendation; the panel generally consists of for-hire captains, with a large percentage from Massachusetts, and a smaller number of private anglers. There are people (consisting of only a portion of those who would benefit from it) that advocate for the idea, but they are outnumbered by those who disagree, and you can see that if you look at the transcripts. The main reason for this is people know it's unfair. Bluefish are a public resource and the public deserves equal access to them regardless of whether they are fishing from shore, from a private boat, or from a Charter or Party boat. Although on face value it might seem that increasing the retention for for-hire vessels is a kind benefit to the operators who struggle in those businesses, their businesses are no more important and pale in comparison to the impact of Private boats on tackle shops and marine businesses of all types. There is no less impact in reducing the bag limit on Private boat versus a Party or Charter boat, arguably there might be larger economic consequences to reducing the bag limit on Private boats. A small number of businesses should never be a priority over fair public access to this resource.

Proposal: **Make the bag limits the same for all boats, ie Private, Charter, and Party boats; it could be 3 fish, 4 fish, or 5 fish.**

Thank you for consideration of my comments,

Jon Sterritt

To Whom it may concern:

March 17th, 2020

I am commenting on the Bluefish stock status seeing as the public comment meeting at Mass maritime was cancelled on March 12th, understandably.

*I am worried that the proposed bluefish regulations miss the point for the following reasons: 1. Fishing mortality is only one of several adverse factors bluefish face. Others include shortage of forage, most notably squid but also herring and other species. In other words, bluefish are part of the marine ecosystem, and the **Sustainable Fisheries Act mandates an ecosystem approach to management**. That means addressing more than just fishing mortality. 2. In my extensive experience recreational anglers on the Cape and Islands release most of the bluefish they catch. Does the Marine Recreational Information Program (MRIP) have good information on this? If they do release most of their catch, will your proposed regulations have any effect at all? 3. Over the last few years it seems like there are two trends with bluefish, less fish in our fishery and on average the size is getting smaller. I would think we should try and help these small fish grow by creating a minimum size so these fish at least have a chance to reproduce before being harvested. **I expand on these and some other points in the rest of this comment.***

Like many, I am incredibly concerned with the status of the bluefish stocks. It is no secret that the two main species in our fishery are Stripers and Blues and we are seeing both on a decline. I am not writing this to point fingers as I know the people working for Mass DMF and ASMFC are good people, but their tools are limited. From what I understand, the **Sustainable Fisheries Act mandates an ecosystem approach to management, yet the only two tools I see used are bag limits and min/max size**. It is silly to think managing bluefish should be just about managing bluefish. The tools that are used to solve overfishing, makes it seem like we assume that the only pressure these fish are getting is from human impact (rod and reel), when in reality Stripers and Blues have less bait than they ever have and more predators (seals/sharks) than anytime in recent history. There is no doubt that the main bait source in the NorthEast for both fish are over pressured. Herring has been recognized as being on the decline and is only now being managed. As for squid, I understand coastwise squid stocks are fine, but localized depletion is taking place in Mass. It is commonly known that most of the fishing for longfin squid in the middle trimester is taking place just south of Nantucket and Martha's Vineyard. These commercial squid boats 10 years ago rarely fished off of Nantucket and their predominance over the last 10 years have severely affected the bait off the cape and islands which is a key piece of the puzzle for these fish, it is also known that the squid boats also have a lot of bycatch that includes bass/blues/seabass/herring/bunker as well as many others. These operators deserve to make a living and if stocks were healthy for Bass and Blues I would advocate that these operators can fish as they want, assuming regulators approve. In a perfectly balanced ecosystem I understand this fishing method, but when it is understood and documented that blues/bass are overfished, why is a contributor such as a non-discriminatory fishing method not being addressed?

I know I am miopic in looking at my local fishery, but it is no secret that RI/CAPE/ISLANDS is the **epicenter** of the Blue and Bass migration in the summer months. Fish are not getting the bait they are historically used to.

Over the last 10 years while we have seen a decrease in bait flow, we have also seen a large increase in competition for the bait that does exist. Competition exists not just amongst bass/blues, but also with the rise in the seal population. Fishermen are talking about it, but no government official is willing to recognize the impact that the seal population is having on bait. **So here is the question I would love to have answered: how much bait(in aggregate) do we need in our ecosystem to sustain a healthy striped bass/bluefish stock as well as the growing seal population? And how does that number compare to what we have in our system? Is our bait flow growing at a rate that it can sustain humans (commercial draggers), fish(optimistic healthy stock levels), seals (continued exponential growth with no management?)**

The solution being presented for increasing bluefish stocks is lowering bag limits from 10 fish per day to 3 fish per day. This is too easy an answer that doesn't solve any of the underlying problems. I don't have the data to prove my assumption, but I doubt less than 10% of recreational fishermen are keeping their bag limit, thus the one change being made will not have any effect. If I am wrong and there is data to prove me wrong, please let me know. I am equally as confident that the new proposed limits of 3 or 5 fish won't be utilized as well. From my twenty years, there is only one group that keeps more than one 1-2 fish per person and that is the party boat fishermen. I may be wrong, but I have had boots on the ground for 20+ years, which is a lot of data.... So the one tool we are using, frankly isn't relevant to solving the problem. This again is my thoughts and I don't have data to prove this, but leads me to ask the questions:

1. **Do MRIP Surveys suggest that fishermen keep their limit?**
2. **Assuming not, why is adjusting the bag limit the only solution on the table if it does not change anything?**

The data point that has been made very public though is that the average size of bluefish is decreasing. So why not use the other tool available to regulators which is to create a minimum size so small fish can get to reproduction age, just as we are doing with Striped Bass. We should also have a maximum size, so the large fish can reproduce safely.

So here is a summary of how we should be looking to solve the problem from one fishermen's opinion:

- Minimum/max size, just like Striped Bass. Let's use the tool in the toolkit that will solve a data driven problem.
- Adjust the bag limit to 1 fish per person per day. Get ahead of this problem, don't chase it.

- Make adjustments to those who catch blues and bass as bycatch so that all that impact it are fairly affected.
- Look at the amount of bait needed to sustain a healthy and hopefully growing fishery and answer the question. **Do we have enough bait today? Will we have enough bait tomorrow?**
- Be thoughtful about protecting bait at its source. Squid for example reproduce south of Nantucket and historically the squiddos are the prime food for blues through July/August. **Which leads to my suggestion, why just manage the fishermen targeting Blues/Bass, shouldn't those who fish for their bait and catch bass/blues as bycatch also be managed differently now recognizing the ecosystem approach? I don't want these people to stop squid fishing, but let's be thoughtful about where they fish so as to limit bycatch and protect the bottom.**
- Look very closely at the role that seals are playing in consuming bait that the bluefish/(other fish) want and **could management also look at studying and understanding what a healthy seal population is?** *It is sad and incredibly inconsistent that every other species that is "managed" is managed to a sustainable level and that there is no provision in the marine mammal protection act to properly assess stock status and/or declare a seals recovered.*

My name is Corey Gammill and I make my living working on the water. I spend 140 days on the water every year and I have for the last 20 years. I fish the waters around Nantucket and south of Martha's Vineyard and east of the cape. My log books can tell it all. We have less bait than we used to, we have less fish (blues/bass) than we used to, and the fish we do have are smaller and we have more big predators(seals/sharks) than ever before. Small adaptations in bag limits will not be enough, we must look at the vertical nature of our ecosystem and make some big changes.

**From:** [McKiernan, Dan \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Public Comment  
**Date:** Wednesday, March 18, 2020 12:57:06 PM

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**From:** david meservey <dmese@yahoo.com>  
**Sent:** Wednesday, March 18, 2020 12:56 PM  
**To:** McKiernan, Dan (FWE) <dan.mckiernan@mass.gov>  
**Subject:** Public Comment

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DMF,

Thank you for the opportunity to comment on the horseshoe crab and fluke proposals. I support the 75 crab limit to CAP permit holders. The LOA's was a decent program that helped crabs to market. But, as a horseshoe crab endorsed fishermen it didn't seem right for non-endorsed fishermen to retain any crabs at all. 50-75 crabs is a good number for incidental catch. With the fluke fishing being so poor in Nantucket Sound during the 2019 season the LOA fishery put a lot of unintended effort against the HSC.

On the other hand, I am against raising the daily catch to 400 pounds of fluke and being able to retain two days of catch. I feel as though the intention is good and it helps to ensure fulfilling the quota but, makes it more economical for larger boats and would have unintentional negative results. 300 pounds has historically worked. Thank you again for allowing me the opportunity to comment.

David Meservey

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

Dear Director McKiernan,

I'm writing to express my opposition to the proposal to open the Massachusetts commercial striped bass harvest earlier than June 23 and to share my overdue appreciation for your leadership at the February ASMFC meeting of the Atlantic Striped Bass Board.

I travelled to the February ASMFC meeting at my own expense. I am gravely concerned about the current state of the striped bass fishery and even more afraid of where we will be three years from now. I'm working to become more informed, more involved, and to bring others into this process. I appreciate and applaud your efforts at the striped bass board meeting to promote consistent regulations coastwide, to check some of the more irresponsible CE proposals from New Jersey and Maryland, and to lead the push against the New York proposal to allow their charter/party boat fleet to harvest fish 31" and greater. While I originally advocated for the option that would establish a 35" minimum size, I have supported the need for consistency in regulations coastwide. Thank you for speaking up for responsible management, both at the board meeting and in your letter to your counterpart in Rhode Island.

Now a resident of Maine, I fish frequently in Massachusetts waters, both recreationally and as a for-hire charterboat captain. Growing up on the water in Scituate, I first earned my Coast Guard license in 1986 and ran private and charter boats out of Boston for a number of summers. I started Gillies & Fallon Guide Service, LLC in 2004 in Phippsburg, ME but extend my season and market by traveling south to fish Boston Harbor to Martha's Vineyard, with the longest stint in the fall when I am on the Cape for September and most of October.

I am not opposed to the commercial harvest of striped bass. I live in a community that is centered around people who make their living on the water. I'm on the town committee that has just received permission to open a limited commercial river herring harvest in one of our ponds. I paid off my college tuition bills catching lobsters and tuna. I have kept my distance from advocacy organizations that have seemed more interested in resource allocation than overall well-being of the fishery. And while I understand the logic behind the argument that commercial striped bass anglers have an approved quota and thus should be allowed more opportunity to harvest that quota, I don't believe it would be a prudent management decision.

You and the Department of Marine Fisheries deserve credit for honoring the guidance of the ASMFC striped bass board and applying equal 18% reductions to the recreational and commercial harvest targets in the state, however, there are so many unknowns about the results of all changes brought about by Addendum VI that a more conservative approach is warranted. The failure of the Massachusetts commercial fleet to reach the harvest quota cap

the last two years adds further weight to the argument for an abundance of caution in management decisions. We have yet to hear back from the TC regarding their calculation of the projected cumulative mortality reduction as a result of Conservation Equivalency approaches from a number of states. Between New Jersey's bonus tag program and Rhode Island's potential 30" to 40" CE, we could be harvesting over a much wider slot than originally intended and the TC has been clear that predicting the effect of any slot limit on striped bass is challenging. Slot limits are an untested tool when it comes to management of this species. With no mechanism in place to hold states accountable for their results under CE proposals, we're at least two and likely three years away from any ASMFC changes to react to changes in the striped bass population. Commercial anglers might argue that what happens on the recreational side shouldn't in any way impact their portion of the fishery but I would suggest that we need to consider each and every management decision with respect to the overall health of the fishery and we'd be well served to remember that we've reached this point in part because Addendum V has failed.

Massachusetts could support and strengthen the commercial striped bass harvesters who make some significant portion of their income from commercial fishing interests with other regulatory changes. There is support in portions of the recreational and for-hire community for changes to the commercial harvest rules that would serve to limit participation and potentially raise prices, directing use to those fishermen who are most deserving of access to this limited and valuable resource.

Retaining the June 23<sup>rd</sup> opening of the commercial season sends a signal to all stakeholders that you and the Massachusetts DMF are committed to taking steps in the best interest of rebuilding this fishery. The significant decrease in commercial harvest landings in 2019 and 2018 are a message that should not ignore. I heard resounding approval of the previous decision to keep the open commercial harvest days at two when it was clear that we wouldn't reach the quota cap. My understanding is that the decision was based in part upon the volume of public comments opposed to adding the third day. That your organization listened to public input helps to keep people involved in the management process and every fishery benefits from greater stakeholder involvement.

Sincerely,

Capt. Peter Fallon  
Gillies & Fallon Guide Service, LLC

824 Main Rd  
Phippsburg, ME 04562  
[pfallon@mainestripers.com](mailto:pfallon@mainestripers.com)  
207-522-9900



March 13,2020

Dan McKiernan  
Acting Director, Mass Division of Marine Fisheries  
251 Causeway St., Suite 400  
Boston, MA 02114

Black Sea Bass

I would like the days of the week to stay the same with an increase to 200 lbs for anglers and 400 lbs for potters. Opening the season earlier would help fill the quota before the fish head off shore into federal waters.

Sincerely yours,  
Pete Kelly  
Permit #108255  
tautog [611@comcast.net](mailto:611@comcast.net)

March 13,2020

Dan McKiernan  
Acting Director, Mass Division of Marine Fisheries  
251 Causeway St., Suite 400  
Boston, MA 02114

Striped Bass

I would like to see the striped bass season start on June 1, 2020. This will help us fill the quota before the fish move off shore.

Sincerely yours,  
Pete Kelly  
Permit #108255  
[tautog\\_611@comcast.net](mailto:tautog_611@comcast.net)

March 13,2020

Dan McKiernan:  
Acting Director, Mass Division of Marine Fisheries  
251 Causeway St., Suite 400  
Boston, MA 02114

Fluke

1. Rod and reel fluke fisherman are against increasing the daily quota of fluke for draggers and rod and reel anglers. The landings of the few fluke anglers lack jumbo and select fish. These are the fish that produce the most eggs for spawning. After a couple of weeks, the draggers catch most of the larger fluke in Martha's Vineyard Sound waters leaving small and short fluke. The average fluke trip for anglers was 64 lbs in 2018 and even less in 2019. It makes no sense to increase it to 250 lbs.and 400 lbs. We compete for fluke in the same waters as the draggers and increasing their daily quotas would only add to killing our fishery sooner.
2. I suspect the huge amounts of black sea bass in Vineyard Sound make it hard for fluke to compete for food. Black sea bass are an extreme predator on steroids eating everything on the sea bed. If you went to a restaurant and there was a two hour wait to eat, you would go elsewhere to eat. Fluke also will go where the food is.
3. We petitioned the DMF and the MA marine fisheries commission in January for a 100 lb by-catch of black sea bass for fluke fisherman starting on June 10, 2020. This will have no impact on other fisherman as we are very few active endorsements. If draggers are allowed a 100lb by-catch it is only fair to give the fluke anglers the same by-catch.
4. The numbers of fluke fisherman are steadily declining and soon we will all be gone. We need this by-catch to survive. Storey Reed was kind enough to send us the attached DMF statistics on fluke landings by rod and reel. ( Please see the attached statistics).
5. My catch in 2017 was 2,752 lbs. In 2018, it dropped to 1,277 lbs.( Less than half.) In 2019, it went down to 1,226 lbs.
6. It should be in Massachusetts best interest to help all of our fisheries become sustainable and to catch our total allowable quota.

Sincerely yours,  
Pete Kelly  
Permit #108255  
tautog 611@comcast.net

YEAR	COUNT FLUKE ENDORSEMENTS ISSUED	# OF ACTIVE ENDORSEMENTS W/ ROD & REEL	AVG_LIVE_POUNDS FLUKE PER TRIP W/ ROD & REEL	ENDORSEMENTS LANDING >= 500 LBS FLUKE TOTAL FOR YR
2000	1346			
2001	1277			
2002	1210			
2003	1174			
2004	1130			
2005	1089			
2006	1030			
2007	984			
2008	955			
2009	927			
2010	900	186	106	76
2011	853	179	97	70
2012	823	154	115	76
2013	792	138	97	49
2014	771	103	65	21
2015	739	118	82	31
2016	721	116	90	43
2017	697	81	112	25
2018	674	73	64	14
2019	658	NA	NA	NA

**From:** [Prescott Clark](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Dean Clark](#)  
**Subject:** Proposed amendments to Division of Marine Fisheries regulations  
**Date:** Tuesday, March 17, 2020 7:50:23 PM

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Scott Clark  
47 Holden St.  
Shrewsbury, MA

02332

To: Acting Director McKiernan  
MA Division of Marine Fisheries  
Director McKiernan,

Striped bass is the most sought-after recreational sport fish on the Atlantic seaboard. The recovery and continued health and welfare of the species trumps my concerns as a fisherman. My summary overview is that we must prioritize the welfare of the fish ahead of the fishermen. Until we make this commitment we will never get off this regulated roller-coaster ride of species abundance/failure. We should not be wasting our collective time and energy on any proposed regulation that doesn't meet the "Fish First" criteria.

However, even though the current regulatory proposals do not measure up to the "Fish First" management protocol and because input from the public has been requested, I am submitting the following:

The rules re gaffs, slot limits, and circle hooks should apply to both recreational and commercial fishermen targeting stripers. The fish don't know or care if the fisherman holds a commercial or recreational permit and the consequences are the same either way so make the rules "universal": Yes on the slot limit, yes on prohibiting the use of gaffs, Yes on requiring the use of circle hooks when fishing with bait.

Every effort should be made to protect the larger fish (female breeders) as they are an absolute prerequisite to the recovery of this currently overfished species. Accordingly, I am suggesting that the 35" and over commercial harvesting requirement be replaced with the same slot limit required of recreational fishermen. I am against opening the commercial season earlier unless the slot limit will apply to everyone. Targeting breeder female bass is both counter-intuitive re. recovery and duplicitous from a competing sector perspective. It doesn't make any sense at all. A recovery won't happen or be able to be sustained unless we all support regulations that put the best interests of the fishery ahead of the selfish interests of fishermen. Toward that end I thank you for arguing at the ASMFC in favor of regulatory universality and against conservation equivalencies. Now, let's see what we can do to protect the breeder females by putting "Fish First".

Scott Clark

**From:** [Katherine Davis](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Public Comment for Regulation Changes for Spring 2020  
**Date:** Wednesday, March 18, 2020 3:51:08 PM

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Public Comment for Regulation Changes for Spring 2020

March 18, 2020

To Acting Director Daniel McKiernan:

I hope this email finds you well. Following are some of the comments and concerns we have regarding the regulations and proposed changes for the 2020 season.

First and foremost, we believe it is important to acknowledge that in the crisis of the Covid-19 pandemic the state and industry are entering into uncertain times and this crisis will undoubtedly have a dramatic impact upon the state of Massachusetts commercial and recreational fishing industries. In light of this crisis, while the state of Massachusetts remains in a 'State of Emergency' as so declared by Governor Charlie Baker, we would encourage DMF NOT to make any changes to the current fishing regulations. We do not know what the future holds for industry users, the tourist industry, the market capacities, and the slew of unforeseen factors we will encounter as we try to mitigate the impacts of Covid-19. New regulations, changes to catch limits, so on and so forth could result in further economic strain upon the industry and should not be made lightly.

We would also like to encourage DMF to consider coming up with special regulations in attempt to assist the fishing industry supporting our communities; we should be looking at ways the fishermen may be able to sell directly to the public while Massachusetts remains in a state of emergency. The public is afraid they won't have access to fresh food and fishermen are afraid they will go out of business. I would implore DMF to create a direct bridge between the fishermen and public during these uncertain times. Now is the time to develop special regulations that will allow the industry to help feed and support their communities, as fishermen have done for hundreds of years.

If the state does insist on altering the current regulations despite the threat from the Covid-19 crisis we would ask that the following statements be added as public comment.

Under the striped bass regulations; "Striped bass imported into the Commonwealth must be marked with a number tag that identifies the state of origin and must be accompanied by documents that verify state of origin." We would ask that when sold to the public, the state of origin be displayed in full public view and have a special designation as being an out of state waters product. With so much focus being put on purchasing locally sourced food and eating with the ecosystem movement, there should be full transparency of where the seafood sold locally was caught. This will help to promote locally caught product.

Under the recreational management measures for striped bass, the legal size of 28 inches we believe should be raised to at least 32 inches or maybe even making the limit the same size as the commercial limit of 35 inches. There is no need for anyone to be targeting small fish. IF the size limits for keepers is increased, this information should be used when gathering catch data; meaning if the harvest rates are lower the year the size limit are increased, the size increase should be factored in.

Under the 'Edible Crab Management' we believe this fishery should be an open permit endorsement not just limited to lobster permit holders.

Under the Summer Flounder Management, we do not believe there should be any changes at all in daily catch limits. We strongly disagree with holding over of any fish to land double limits. Fluke is a beautiful premium product; we should be looking to maintain a top price for a quality product and seek to avoid causing a glut in the market.

Under the Weir fishery section, we strongly disagree with the increase of black sea bass quota from 15,000 pounds to 24,000 pounds. IF the state is considering increasing catch limits, we would encourage the state to increase those limits to benefit as many state water fishermen as possible, not limit those benefits to one or two fishermen.

Under the Horseshoe Crab Management changes, we would strongly suggest the state DOES NOT allow the possession of 75 crabs to non-permit holders. This would allocate 25% of the quota over to non-permit holders. Unless the state is willing to compensate for that loss by allocating 25% of the quota from other fisheries such as groundfish to non-permit holders, it does not make sense to take away from those who hold the endorsement. Permit holders with horseshoe crab endorsement should not be forced to relinquish their rights to a quarter of the quota unless the state is willing to compensate them for this loss of income.

Thank you for your time and consideration,

Nathan and Katherine Davis  
Sarah Belle Fisheries Massachusetts CAP permit holder

Sent from [Mail](#) for Windows 10

**From:** [Nathan Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Letter to Mass Fisheries  
**Date:** Tuesday, March 17, 2020 4:11:05 PM

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**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 Dan McKiernan

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

**If this not a red flag warning of a fishery in trouble**, I do not know what is a better example. Also, we can see that overall fish mortality, in recreational and commercial striped bass, of fully-recruited fish has continued to spiral downward since 2012 which further leads to biomass loss. Additionally, we have not even touched on the striped bass by-catch mortality from trawlers off Massachusetts, or the effects of predation on striped bass, such as seals and sharks.

We cannot deny the effects of climate on striped bass as we have seen increasing issues in the spawning grounds, such as the Chesapeake Bay, with warming temperatures, algae blooms and reduced young of the year population. One can ask why the commercial fishermen did not meet their quota. The answer is clear and simple, they could not catch enough fish. Why? Because we have depleted them and they just do not exist. The larger fish have been previously caught and removed from the population and those larger fish are the big breeding females that produce more eggs and are the sustainers of the striped bass population.

I feel that we need to take several drastic measures.

- First- we need tackle restrictions, no treble hooks at all, circle hooks only on lures and live/cut bait. The goal is to do no harm to the fish that are caught. Have fun catching them but do no harm. (see photo)
- The current options proposed are not responsible enough to help the fishery. We need the most conservative approach.
  - THERE SHOULD BE NO SLOT LIMIT
  - The recommendation should be a total size limit of 40" for all anglers commercial and recreational – GOAL IS TO KEEP MORE FISH IN THE BIOMASS
- Additional we need to re-evaluate the data in 2021 and strongly consider is totally close this



fishery in all 13 states for both commercial and recreational striper fishing. They did this exact thing in the early 80's and it worked.

I am not forwarding such recommendations without offering to help. Please feel free to contact me to help in anyway, such as collect data, analyze data or help organize meetings, or whatever you need. The goal is to have a sustainable fishery for all anglers recreational and commercial alike, this is all of our responsibility. Massachusetts needs to lead the way.

Very Respectfully-

Nate Ryan  
[ryan\\_nathan23@mybps.me](mailto:ryan_nathan23@mybps.me)

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**From:** [Jack Skammels](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Opening of bass season  
**Date:** Friday, March 13, 2020 12:09:07 PM

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My name is John skammels I have two striped bass endorsements and I encourage the opening of striped bass season June 1st .I have been a commercial fisherman rod and reel for 50 years and I have seen Rhode Island open earlier than Mass many of years where they set the price and we have to wait for three weeks or more before we can fish. I would like to obtain a Rhode Island license but I have been unable to do so although Rhode Island residents can I obtain a Mass license easily .please go ahead with the June 1st opening thank you

Sent via the Samsung Galaxy S7 edge, an AT&T 4G LTE smartphone  
Get [Outlook for Android](#)

**From:** [Joseph Modry](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed striped bass regulations  
**Date:** Friday, March 13, 2020 1:18:05 PM

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Acting Director Daniel McKiernan:

I am writing to voice my opposition to MA increasing the commercial season length for striped bass during a time when the stock is in trouble and managers are supposed to be working on ways to save the stocks, not destroy them. I typically travel to the Cape multiple times during the summer, with friends, to enjoy striped bass fishing. While there we release every fish we catch and spend plenty of money on tackle, restaurants, tackle, and lodging. I will be watching the outcome of this decision carefully and will boycott fishing in your state, and encourage others to do the same, if you increase commercial harvest opportunity in times like these.

Sincerely, Jay Modry Greensboro, Vermont

---This message was sent by a Hazen Teacher---

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***OSSU - Cultivating Learner Agency through Reflective Practice***

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**From:** [Brendan Byrne](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020  
**Date:** Thursday, March 12, 2020 1:00:42 PM

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Please please please do not open the Striped Bass season early. We really need to see if the current measures will be effective especially with the inconsistent application of recommendations by state.

Thank you for your consideration.  
Brendan

Sent from my iPhone

**From:** [Fleming, Braden](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Massachusetts proposed Striped Bass regulations  
**Date:** Friday, March 13, 2020 7:18:12 AM

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Dear Acting Director Daniel McKiernan:

I am writing this letter to address my thoughts about the 2020 MA Striped Bass Regulation Proposals. I currently live in Sherborn MA and I've been striped bass fishing in MA and all of New England with a fly rod since 1990. Over the past few years there has been a notable decline in the quality and quantity of the fish that I catch and stricter regulations are needed. I am in agreement with the proposed slot limit. I strongly feel that the no gaff rule should be applied to commercial anglers. I also feel think that opening the commercial season before July 1st is a mistake as it will expose the large migratory breeder females to increased harvesting. Finally, I think it is important to require all commercial striped bass landings to be tagged at the point of capture and not at the point of sale.

Sincerely,

Braden Fleming

--

Braden C. Fleming  
19 Saddlebrook Rd  
Sherborn MA 01770  
PH: 401-316-4737

**From:** [rob.mitchell](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 regulation proposals  
**Date:** Thursday, March 12, 2020 6:58:07 PM

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I understand there is a sunset for replies next Monday. I recently moved to Plymouth with the intent of having fun with canal and surf casting for stripers. Obviously, last year was a struggle. I believe the folks at Stripers Forever are honest in their assessment of the proposed regulation changes and would ask that you give consideration to their recommendations. The only way for all of us (both sport and commercial fisherman) to succeed is to have a vibrant striper population!.

--

Regards,  
Rob Mitchell

**From:** [Dave Rimmer](#)  
**To:** [Fish, Marine \(FWE\)](#); [McKiernan, Dan \(FWE\)](#)  
**Subject:** 2020 Regulatory Proposals for Striped Bass and Bluefish  
**Date:** Friday, March 13, 2020 7:49:00 AM

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I would like to be on record for the following:

#### Striped Bass - Recreational

1. I support the 28-35" slot to limit to achieve the 18% reduction. However, I would have preferred to see both the recreational and commercial fisheries move to a 36" minimum limit together. I think this would result in greater reductions in mortality and simpler regulatory enforcement.
2. I support the mandatory use of circle hooks for bait fishing but I think the regulation should not have exceptions for any sectors of the fishery.
3. I support a ban on any landing device that punctures fish.

#### Striped Bass - Commercial

1. I oppose an earlier opening to the commercial season.
2. No opinion on have open commercial days change from Monday and Thursday to Monday and Wednesday, other than it seems the proposed change will make it easier for non-resident permit holders to travel to fishing areas and stay in the area to fish 2 out of 3 days. I thought the original reasoning for separating days was to make it less easy for this to happen.
3. I support increasing the minimum size to 35" but as I stated above, I think MA should adopt a statewide minimum limit of 36" for all fisheries.

#### Bluefish

1. I support a MA conforming with coastwise mandates for recreational bluefin harvest.

Thank you.

Capt. Dave Rimmer  
Joppa Charters  
57 Boston Road  
Newbury, MA 01951  
508.954.0169 c  
[daverimmer1960@gmail.com](mailto:daverimmer1960@gmail.com)

**From:** [Juro](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attention: Daniel McKiernan, regarding proposed regulatory changes  
**Date:** Thursday, March 12, 2020 12:36:24 PM

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Hello and thanks for taking feedback on this important matter.

It is obvious to all on the water that the striped bass stocks are in a troubled state right now, yet only the commercial proposals are directed toward helping them, There is a big gap between the large mature striped bass population and the undersized year classes that everyone has been experiencing firsthand - with the slot size missing until the schoolies mature down the road. Yet the proposal is to allow commercial access to the migrating post-spawn fish before they take residence. Makes no sense.

Also the fluke fishery is abysmal in MA for recs. This management approach is not balanced for the rec vs commercial and singularly favors the latter. We can barely find a legal fluke once the trawlers have come through.

1. Recreational Striped Bass (322 CMR 6.07).

All of these regulations seem to have a positive effect on the welfare of the fish, however, item "C" does not specify whether tools like bogagrip which cause internal damage from lifting the entire fish by the lip is invasively damaging, where it certainly is. Let's be clear about it.

Regulations should be coastwide not state by state.

3. Commercial Striped Bass (322 CMR 6.07).

A one-inch gap should be raised to 36" to provide a clearer differentiation. June 1st start will allow targeting of migrating fish verses those 'settled in' and will decimate schooled fish before they distribute into residence for the season.

4. Commercial Summer Flounder (322 CMR 6.22).

Fluke fishing has been just terrible in Massachusetts, fishermen have been needing to catch sometimes two dozen shorts to get one barely legal fish for dinner even with experienced rods. Once they drag the shoals it is over, by increasing trip limits without shortening something else it is the death knell for the rec fishery.

You are managing fluke for the benefit of the trawl fishery, no one else.

5. Commercial Black Sea Bass (322 CMR 6.28).

Similar situation to the fluke fishery but much more abundant - however the stocks are culled to small fish such that people catch very small fish all day and go home empty - while these tiny fish are on fish store shelves all the time. I am not aware of the size restrictions for commercial but they are not 15".

7. Commercial Menhaden (322 CMR 6.43, 7.01, 7.04 and 7.06).

This is finally starting to show signs of recovery - why mess with it?? This is a cornerstone species, not a target for exploitation - leave well enough be.

8. Sand Lance (322 CMR 6.42).

200 pounds for "traditional bait"? How about 100 pounds... that is about 300-400 bags of bait for a day's fishing.



**From:** [Ben Whalley](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attn: Acting Director Daniel McKiernan  
**Date:** Wednesday, March 11, 2020 9:27:25 PM

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Acting Director Daniel McKiernan

Massachusetts Division of Marine Fisheries

251 Causeway Street, Suite 400

Boston, MA 02114

Dear Director McKiernan,

I'm writing to express my opposition to the proposal to open the Massachusetts commercial striped bass harvest earlier than June 23 and to share my overdue appreciation for your leadership at the February ASMFC meeting of the Atlantic Striped Bass Board.

I am extremely concerned about the current state of the striped bass fishery and even more afraid of where we will be three years from now. I'm working to become more informed, more involved, and to bring others into this process.

I am a resident of Maine, however I fish frequently in Massachusetts waters. I am not opposed to the commercial harvest of striped bass. I live in a community that is centered around people who make their living on the water. paid off my college tuition bills catching lobsters. I have kept my distance from advocacy organizations that have seemed more interested in resource allocation than overall well-being of the fishery. And while I understand the logic behind the argument that commercial striped bass anglers have an approved quota and thus should be allowed more opportunity to harvest that quota, I don't believe it would be a prudent management decision.

You and the Department of Marine Fisheries deserve credit for honoring the guidance of the ASMFC striped bass board and applying equal 18% reductions to the recreational and commercial harvest targets in the state, however, there are so many unknowns about the results of all changes brought about by Addendum VI that a more conservative approach is warranted. The failure of the Massachusetts commercial fleet to reach the harvest quota cap the last two years adds further weight to the argument for an abundance of caution in management decisions. We have yet to hear back from the Technical Committee regarding their calculation of the projected cumulative mortality reduction as a result of Conservation Equivalency approaches from a number of states. Between New Jersey's bonus tag program and Rhode Island's potential 30" to 40" CE, we could be harvesting over a much wider slot than originally intended and the TC has been clear that predicting the effect of any slot limit on striped bass is challenging. Slot limits are an untested tool when it comes to management of this species. With no mechanism in place to hold states accountable for their results under CE proposals, we're at least two and likely three years away from any ASMFC changes to react to

changes in the striped bass population. Commercial anglers might argue that what happens on the recreational side shouldn't in any way impact their portion of the fishery but I would suggest that we need to consider each and every management decision with respect to the overall health of the fishery and we'd be well served to remember that we've reached this point in part because Addendum V has failed.

Massachusetts could support and strengthen the commercial striped bass harvesters who make some significant portion of their income from commercial fishing interests with other regulatory changes. There is support in portions of the recreational and for-hire community for changes to the commercial harvest rules that would serve to limit participation and potentially raise prices, directing use to those fishermen who are most deserving of access to this limited and valuable resource.

Retaining the June 23rd opening of the commercial season sends a signal to all stakeholders that you and the Massachusetts DMF are committed to taking steps in the best interest of rebuilding this fishery. The measurable decrease in commercial harvest landings in 2019 and 2018 are a message that should not be ignored. I heard resounding approval of your organization's 2019 decision to keep the open commercial harvest days at two when it was clear that we wouldn't reach the quota cap. My understanding is that the decision was based in part upon the volume of public comments opposed to adding the third day. Your organization listened to public input last year and I hope will do the same this year.

Respectfully,

Ben Whalley

Registered Maine Guide

207-274-8782

**From:** [George Driscoll](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attn: Dan McKiernan  
**Date:** Wednesday, March 11, 2020 6:11:16 PM

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3/11/20

I am unable to attend tomorrow's meeting at Mass Maritime, but wanted to go on record with my input.

While I applaud the efforts of DMF to manage and regulate our fisheries, I fear that none of the proposed regulation changes, commercial or recreational, will have the desired outcome without including a program to deal with the gray seal population. These apex predators have no regard for size or bag limits, and their numbers increase exponentially each year. While I have no science to support my opinion, I certainly have no lack of anecdotal evidence, as does anyone who fishes every day on the Outer Cape. Customers on the boat I run, and on virtually all other boats, lose fish (and tackle) to seals on every trip. While I realize these fish on the line are easier targets for seals, countless other fish are undoubtedly being consumed as well. The readings I have done on the subject all agree that these seals eat between 5 and 20 percent of their body weight in fish each day. Multiply that number by the many 10's of thousands of seals in our waters (let's say conservatively at an average of 400 lbs per animal), and the impact on local fish populations (native and migratory) is staggering. I've read and heard that seals mainly target sand eels and bait fish. They also target to a very large extent striped bass and bluefish, a readily observable fact.

People who favor eliminating the commercial striped bass fishery and even the recreational taking of bass inevitably reference the success of the moratorium of the "80s". What most of those same people don't realize is that that moratorium not only applied to rod and reel fishermen, who took fish 1 at a time, but to gill netters and purse seiners, who took fish many tons at a time. When the moratorium was lifted it was only for rod and reel fishermen. After that lifting, the spectacular recovery continued until around 2010, letting rod and reel fishermen off the hook, so to speak. Since then, there has been an inverse relationship between the bass and seal numbers in our waters. The same can be said of bluefish and seals. Remember, there were no seals around to factor into the moratorium.

I know you are concerned about the release mortality rate, particularly for the recreational fishery. Well, I think it's true that any fish released is in a weakened state, even when handled and put back perfectly. That fish is most definitely in extra jeopardy from seals while it catches it's breath.

Circle hooks, size slots, quota cut, lip clamps, netting rather than gaffing, all good ideas; all window dressing without acknowledging and addressing the major threat to our fish.

Capt. George M. Driscoll

**From:** [John Torosian](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** attn: Daniel McKiernan  
**Date:** Thursday, March 12, 2020 10:23:41 AM

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Mr. McKiernan

I am writing in regards to proposed changes to the commercial striped bass fishery. I am 34 years old and have been active in this fishery since i was a kid going with my dad. First let me say that i believe the striped bass stock is healthy. I am on the water 4 to 7 days per week from april to december. I fish the northshore area from the merrimack river to boston. I observed plentiful numbers of bass all season including large schools of bass over 40" in length and also an incredible amount of bass between 18-26". Many of these fish remain far offshore for most of the season as was discovered by recent satellite tagging studies done by the fisherman magazine and gray fishtag research. I feel that all these new regulations are the result of vocal unsuccessful recreational fisherman who spend very little time on the water and blame commercial fisherman for everything. Many of the complaints i hear are from shore fisherman. Perhaps just like every other fish in the north atlantic there range has shifted in recent years. I believe that the commercial regulations should stay the same as they were last year. Raising the size limit is only going to make it harder and lowering it is a worse idea and opening the season earlier will not make much of a difference. We need more fishing days so the active fisherman can utilize the quota.

Thank you

John Torosian permit # 176042

**From:** [Rich Nealley](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Black sea bass  
**Date:** Thursday, March 12, 2020 11:14:39 AM

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Hello,

In reading the daily limits on sea bass i found one area that needs more detail. The proposal reads that no one can possess or LAND more than five sea bass. The word "LAND" indicates that once you catch 5 fish you have reached your daily limit whether they are legal or not. This needs better explanation. As written a fisherman can only "catch" five per day. Point of fact! While fishing it may take catching and releasing 20 or more fish before getting 5 legal size fish.

Thank you,

Richard Nealley

Nashua, NH

Sent from my iPhone

**From:** [Michael Spall](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** comment  
**Date:** Thursday, March 12, 2020 11:18:35 AM

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Good Morning,

I am not sure if this is the correct place to send comments regarding the upcoming meetings on fishing regulations. I am a recreational fisherman. I do not see how the commercial size limit for summer fluke can be 14" while the recreational size limit is 17". With such a large disparity, the commercial boats just drag the shoals of Vineyard Sound and there is nothing left for the recreational fisherman to keep. Last summer I caught 1 legal out of about every 10-15 fish. Even with circle hooks, a good number of the undersized fish will die. I just quit fishing for fluke because it was not worth it. You have essentially eliminated the recreational fishery.

--

Michael Spall  
Senior Scientist  
Department of Physical Oceanography

MS #21  
Woods Hole Oceanographic Institution  
360 Woods Hole Road  
Woods Hole, MA 02543

508-289-3342  
mspall@whoi.edu

[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.whoiedu\\_science\\_PO\\_people\\_mspall\\_index.html&d=DwICaQ&c=IDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns\\_w&r=Y1CBtQZE17Rj2MeXjOmTypaU2t5pniKda51CF15IQyg&m=RqdWR06p2U4toL3q3kO1NWODINCO8r2TODgEOGcyTXM&s=i3fZK5L3aT73PCAAQxW-iOY11JJe-fyXqwG7eeu78gM&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.whoiedu_science_PO_people_mspall_index.html&d=DwICaQ&c=IDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns_w&r=Y1CBtQZE17Rj2MeXjOmTypaU2t5pniKda51CF15IQyg&m=RqdWR06p2U4toL3q3kO1NWODINCO8r2TODgEOGcyTXM&s=i3fZK5L3aT73PCAAQxW-iOY11JJe-fyXqwG7eeu78gM&e=)



**From:** [rmjtag@aol.com](mailto:rmjtag@aol.com)  
**To:** [Fish, Marine \(FWE\)](#); [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Bass start date  
**Date:** Thursday, March 12, 2020 8:55:29 PM

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To whom it may concern,

I have been fishing Massachusetts waters for striped bass for over 30 years and without a doubt, the population is in decline. I applaud any efforts to enact conservation measures for both recreational and commercial fisherman.

I 110% vigorously oppose opening commercial bass fishing on June 1st. The commercial quota has not been met for the past couple of seasons because the population is in trouble. The migration is in full swing from mid May into June and I cannot see any good reason to allow the commercial fleet to be able to hammer these local populations of fish during this critical timeframe. Besides that, commercial days are an absolute circus at the boat ramps and on the water. It is intolerable.

Massachusetts is criticizing and pressuring RI to fall in line with some of the proposed regional measures but they are skeptical of our motives because of this proposal to open commercial fishing early. Please **DO NOT OPEN COMMERCIAL SEASON** early.

Thank you,

Rob Tartaglia  
Wrentham

**From:** [Michael Kowaleski](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass regulations  
**Date:** Thursday, March 12, 2020 11:55:33 AM

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Dear Division of Marine Fisheries,

I have been an active, commercial bass fisherman for 20+ years.

I am in full support of measures to reduce fishing mortality in order to stabilize and conserve the stock.

We have been unable to fill our commercial quota for the last 2 years.

Recent data clearly demonstrates that recreational fishing is responsible for over 90% of the fish landed or mortality related to release.

As such we need to take measures, as you have to reduce mortality related to recreational fishing. More can be done. Why not require circle hooks for charter boats? The captains may be experienced, but the anglers are not, and that is where the mortality comes from.

In addition, sensible reductions in commercial landings are reasonable.

Given the current state of the fishery, I feel that increasing the minimum size from 34" to 35" would drastically reduce the harvest.

Many of the fish landed in the last 2 years by myself and other commercial fisherman that I know are in the 34-35" size class. Increasing the minimum size to 35" would eliminate these from harvest. They would be returned to the sea, and some percentage would be lost to release related mortality, and this benefits no one.

The current regulation requiring pectoral fin removal on non-fishing days should help prevent commercial fisherman from stock piling. Creating a recreational slot limit of 28' - 34" and a commercial limit of 35" and over will not be any more effective than removing the pectoral fin.

Those that cheat, will still cheat, and keep 35" fish on noncommercial days, and stock pile them to sell later in the week.

The solution to this is enforcement, which I can honestly say is woefully lacking. Stockpiling is occurring on a daily basis by charter boats and others whose boats are kept at dock and rarely inspected. Small fish are gaffed and killed. We desperately need enforcement on the water.

In my view the sensible measures are to keep the minimum commercial size at 34". If necessary one could also consider reducing the total limit to 10 fish. That is reasonable to pay for fuel and expenses for most fishermen.

Creating a commercial slot limit of 34" to 40" is also another option to help reduce mortality in large breeding females.

I would be glad to discuss further at any time.

Best regards,

Mike

Michael P. Kowaleski, DVM, Diplomate ACVS and ECVS  
Professor of Orthopedic Surgery  
Tufts Cummings School of Veterinary Medicine

200 Westboro Road  
North Grafton, MA 01536

[mike.kowaleski@tufts.edu](mailto:mike.kowaleski@tufts.edu)

**From:** [Will Pinkus](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial striped bass regulations  
**Date:** Wednesday, March 11, 2020 12:13:58 PM

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Good afternoon,

I am writing you due to the proposal that would increase the length of the MA commercial striped bass season. As an avid angler for the past 30 years, I have witnessed the decline of our fisheries first hand. First cod and herring amongst many others now striped bass and bluefish. Recently in addition to a decline in the striped bass fishery I have also witnessed a dramatic increase in the popularity of recreational fishing. These factors alone are reason enough to shorten and strengthen regulations. I have also noticed that several organizations conduct much more extensive research to collect the most accurate representation of the status of our fisheries in Massachusetts and along the east coast where these fish migrate. Extending a season due to shortfalls in commercial quotas is not only uneducated, it's an irresponsible act when responsible for protecting our fisheries. Massachusetts has had a long line of poor decisions that have negatively affected a number of species in our waters. It's time for The state to step up and take the lead in conserving these species by not only declining the extension of the commercial season, but taking additional proactive measures to restore our fisheries to what they once were. Thank you for your valuable time.

Tight lines,  
Will Pinkus

**From:** [Peter Readel](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass season  
**Date:** Wednesday, March 11, 2020 3:27:34 PM

---

The obvious reason that the Commercial Landings of Striped Bass in Massachusetts have not reached 100% of quota over the past two seasons is that the biomass of Striped Bass is in dangerously low quantities. Increasing the length of season is exactly the WRONG way to allow regeneration of that biomass! If there is to be a change the SEASON SHOULD BE SHORTER, Quota's reduced and a true test for qualification as a Commercial Harvester developed! Please Coordinate with neighboring states and establish the same Commercial Seasonal dates and length limits.

Thank you for hearing my views.

Peter Readel  
petereadel@gmail.com

Sent from my iPad

**From:** [Joshua Pennie](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial striped bass starting date  
**Date:** Wednesday, March 11, 2020 12:51:21 PM

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Please let the fish get to their spawning grounds and do not move the commercial fishing starting date earlier in the month. PLEASE!

**From:** [dean machado](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Daniel Mckiernan  
**Date:** Wednesday, March 11, 2020 4:26:09 PM

---

Hi I'm a Rec angler that practices safe catch and release.. I'm concerned about the state of the striped bass fishery and want more conservative management measures, not less. I'm opposed to the one fish at 28-35" and would rather see a one fish at 39"..I'm also opposed to adding days to the commercial striped bass season. Also opposed to starting the season early..I feel these fish are much more valuable alive than dead.. Please consider my comments and hopefully the right decisions are made..

Dean Machado

Sent from my iPhone

**From:** [Mike Delzingo](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Daniel McKiernan: comments on Winter 2020 Marine Fisheries Public Hearing Notice  
**Date:** Wednesday, March 11, 2020 3:50:34 PM

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#### Article 1, Recreational Striped Bass (322 CMR 6.07)

section a

"Adopt a slot limit of at least 28" to less than 35"

I disagree with this ruling,

Although I understand other states are following this slot limit and this is most likely what will be enforced, I do not see this lowering the the harvest of the recreational community, as this is the exact targeted size class of fish they are after. This will also serve to eliminate many tournaments in Massachusetts as well as deny the recreational angler that trophy fish of a lifetime. I recommend a trophy tag to accompany this slot limit for certain occasions.

Section b.

expand the state's existing circle hook rule to potentially require all anglers whether fishing from shore, a private vessel or a for-hire vessel to use circle hooks

I disagree with this proposal.

Charter boats should be exempt from this rule. Professional Captains and crews are not inexperienced at targeting certain size class of fish using other hooks. No Captain wants a bloody mess of a fish on board with their clients looking on, or to kill fish unnecessarily.

This rule should pertain to the shore based chunk angler only.

Also how is the boat based angler supposed to target flounder, or other species, if he already has a bass on board? He would be out of compliance using anything other then circle hooks.

Section c.

Prohibit recreational anglers from removing striped bass from the water with any device other than a non-lethal device

I agree with this rule.

Although the Boca and lip-grip type devices should also be banned from use on fish intended to be released.

#### Article 2. Recreational Bluefish (322 CMR 6.18)

I agree with this decision.

#### Article 3. Commercial Striped Bass (322 CMR 6.07)

section A.

Move the start of the commercial fishery from June 23 to as early as June 1.

I agree with this proposal.

We have a healthy population of commercial size fish within reach in Massachusetts bay in early June and this will give the fleet a chance to land those fish. These are not the ONLY schools fish to migrate. only the first.

Section B



Adjust the open commercial fishing days from Mondays and Thursdays to Mondays and Wednesdays.

I disagree with this proposal.

The state should not be moving the days to accommodate the boats south of the cape and their black seabass fishery. We do not have the luxury of that fishery north of the cape and moving the days even CLOSER together will harm the guys north of the cape. These commercial size fish are not just sitting in a certain spot waiting to be harvested on any given day. These fish are constantly on the move. They have to be found and followed and contrary to popular belief, they do not all stay together in one spot day after day, just waiting to be caught., Adding an additional non fishing day back-to back-to back-to back will make it even harder to harvest the quota.

Section C. Increase the minimum size from 34" to 35".

I disagree with this proposal. The Charter fleet has a history of being able to sell commercial fish on charters and this proposal will completely eliminate that. This will be yet another TAKE from the commercial fleet who also hold charter permits.

Commercial size limits should mirror recreational limits and if the slot limit is imposed for recreational, it should also be implemented for commercial.

The Massachusetts commercial bass quota is being micro managed into failure. The past two seasons are proof positive of that fact.

Commercial bass fishermen are being forced to jump through hoops of closed days around holidays where the Boston fleet can't fish because of parking lot congestion concerns on the cape. A shortened fishing week without the five fish Sundays, making it even harder to fish this open access fishery for captains who have other day jobs.

Not being able to hold fish overnight Sundays means you have just about eliminated the nighttime bass fishery, because you can't sell your fish after 8pm in Boston and you can't be in possession after midnight. Guys are being forced to stop fishing early to make the buyers truck, or make it to the fish pier before closure.

The commercial fleet is diverse and not just trailer boats from the cape, and they are not just fishing race point and off Nausett. There are many larger boats, in slips and are restricted to fish in their local areas. You cannot choose days and seasons in advance and simply hope the fish are there on the days you have selected. (see 2018 & 2019)

How can we be expected to land the quota under these ever increasingly stringent regulations.

The striped bass fishery is ever changing with fish moving away from the hoards of seal on the Cape, and now the ever increasing Great white shark population.

It's time the state accept input from fishermen who do not live on cape cod, do not trailer to chase the bite, are limited to fish when the fish are actually available, and have full time day jobs.

This is not a restricted access fishery, but you sure are making it harder to fish.

Also, taking public comment from recreational anglers on commercial fishing proposals is a huge conflict of interest and surely heavily weighted against the commercial fisherman.

The majority of recreational anglers are bitter and spiteful towards the commercial fleet and would like nothing better than to see the continued failure to land the quota, Using that as ammunition in further attempts to eliminate the fishery all together.

Captain Mike Delzingo  
Boston, Ma.



**From:** [Andy Boynton](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Feedback on proposed fishing proposals/striped bass  
**Date:** Thursday, March 12, 2020 5:13:21 PM

---

Dear Daniel,

I am an avid fisherman and a senior administrator at Boston College. The economic and positive impact that striped bass fishing has on the Commonwealth (and beyond) is immense. My feedback follows, and I thank you in advance for your consideration.

1. Both recreational and commercial anglers ought to be subject to **the same rules regarding the use of circle hooks**. [*J hooks kill no matter who is using them*]
2. **The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers**. [*same reasoning as above*]
3. **Opening the commercial striped bass season before July 1 is wrong and seriously misguided, and shortsighted**. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to **Monday and Wednesday is wrong, and bad business**. [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. **The proposed slot limit is acceptable** [*the 18% harvest reduction is necessary*]

**And although it is not being considered in the proposed 2020 regulations it ought to be required that all commercial striped bass landings be tagged at the point of capture and not point of sale as it is now. We need to think ahead.** Current regs are a tacit endorsement of the rampant illegal black market in stripers. Thank you again for your consideration and help.

Andy Boynton

--

Andy Boynton  
John and Linda Powers Family Dean  
Carroll School of Management  
Boston College  
140 Commonwealth Avenue  
Chestnut Hill, MA 02467

[boyntona@bc.edu](mailto:boyntona@bc.edu)  
617-552-8420 (p)  
617-552-8738 (f)

**From:** [Harry Scott](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Fwd: Tonight's (March 12th) Public Hearing to Continue as Scheduled  
**Date:** Thursday, March 12, 2020 10:43:01 AM

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Dear Acting Director Daniel McKiernan,

As a recreational saltwater fisherman, I am concerned and dismayed at the lack of consistent regulations for Atlantic striped bass limits especially. Specifically, while we here in Massachusetts are being held to a high standard, including the proposed slot limits of 28-34", the Chesapeake Bay (CB) commercial fishing industry is wiping out the stocks by allowing them to take from the "CB and Rivers: 1,471,888 lbs. (part of Baywide quota)" from Maryland waters and another 1,064,997 lbs in Virginia waters of 18" minimum size fish

(see [https://dnr.maryland.gov/fisheries/Documents/Reg\\_Changes/DNR-FS-2020-03\\_Striped%20Bass%20Summer%20and%20Fall\\_Small%20Business%20Compliance%20Guide.pdf](https://dnr.maryland.gov/fisheries/Documents/Reg_Changes/DNR-FS-2020-03_Striped%20Bass%20Summer%20and%20Fall_Small%20Business%20Compliance%20Guide.pdf)).

How can we ever have our stocks ever return to reasonable levels when the juvenile stock populations are being decimated down south?

I urge you to fight for consistent size limits throughout the Atlantic fishery and to have the Atlantic States Marine Fisheries Commission curb the CB depletion of the Atlantic striped bass juvenile stock populations. Both our commercial and recreational fishermen deserve to be on equal footing so please help curb their limits and allow the Massachusetts stock to have a chance to rebuild.

While I am angered at what is happening in the Chesapeake Bay with regards to their Atlantic striped bass commercial harvests, I do urge you to consider their hook recommendations for Atlantic striped bass including restriction to use of only non-offset circle hooks when live-lining or chumming and no treble hooks when bait fishing. In my experience, treble hooks cause more fish fatalities than they are worth.

Thank you for your consideration.

Harry Scott, Duxbury, MA

----- Forwarded message -----

From: **MA Division of Marine Fisheries** <[marine.fish@public.govdelivery.com](mailto:marine.fish@public.govdelivery.com)>

Date: Thu, Mar 12, 2020 at 10:03 AM

Subject: Tonight's (March 12th) Public Hearing to Continue as Scheduled

To: <[hscott1959@gmail.com](mailto:hscott1959@gmail.com)>

Having trouble viewing this email? [View it as a Web page.](#)

## Commercial Fishing Advisory Image



March 12, 2020

DMF will hold tonight's (March 12<sup>th</sup>) public hearing at Mass Maritime Academy's Admiral's Hall, as scheduled, to discuss proposed regulatory changes for striped bass, bluefish, black sea bass, fluke, and more.

**March 12, 2020  
6 PM  
MA Maritime Academy  
Admiral's Hall  
101 Academy Drive  
Buzzards Bay, MA**

In lieu of attending in person, interested parties can review the proposals and a detailed version of the public hearing presentation on our [website](#). We are accepting written public comment until 5 PM on March 16. Please contact our Boston office if you have any clarification questions regarding the online material.

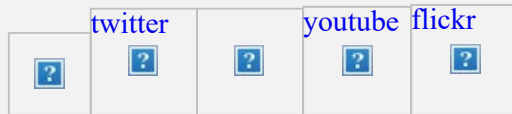
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## Massachusetts Division of Marine Fisheries

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Commonwealth of Massachusetts  
Division of Marine Fisheries  
251 Causeway Street, Suite 400  
Boston, MA 02114  
[Marine.fish@mass.gov](mailto:Marine.fish@mass.gov)

Douglas E. Sylvia  
318 Rock O Dundee Road  
Dartmouth, MA 02748  
License No. 017708

March 11, 2020

Dear Acting Director Daniel McKiernan,

I am a long term, active, Commercial Black Sea Bass fisherman and I wanted to inform you that I believe that the Commonwealth of Massachusetts Division of Marine Fisheries did a great job when it obtained input from Commercial Fisherman and devised its proposal for regulatory changes to the Commercial Black Sea Bass Fishery. The Division appears to have accepted the input from Commercial Fisherman and to have steered away from either Friday or Saturday being open fishing days, because there are no auctions at Fulton Market on Saturdays or Sundays and, therefore, no transport of fish to New York on Friday or Saturday nights. Massachusetts needs to continue to supply the freshest possible Black Sea Bass to one of the world's largest fish auctions.

The only other comment I have upon proposal 5.a. of the Winter 2020 Marine Fisheries Public Hearing Notice, is that the proposal for changes which is "DMF's preference", whereby the existing season and open fishing days schedule is maintained, is also my preference. The Black Sea Bass commercial fishery is a small boat fishery and days will be lost during the season due to bad weather. There must be three days per week open to fishing, in order that there be at least two days during the week when the weather is good enough to fish. If fishing is open only two days per week and one of them falls on a bad weather day, the Commercial Sea Bass fisherman will loose 50% of his income for the week. This would be an unfortunate result. Also, when it comes to trap

fisherman, the Black Sea Bass need to be removed from the traps in an acceptable amount of time to preserve their quality. Having Sea Bass remain in the traps for a large number of days before their removal will lead to poorer quality fish and lower prices. We need at least three days per week to fish.

Thank you for your attention to these important matters.

Yours Truly,  
Douglas E. Sylvia



**From:** [Jason Whalen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Mass commercial fishing liscense (striped bass)  
**Date:** Thursday, March 12, 2020 11:27:13 AM

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Good afternoon,

I have sent in the form to RENEW my commercial permit about 2-3 weeks ago under the name Jason Whalen. My check hasn't been deposited nor have I heard back as to whether or not my application has been received. Is there anyway for you to let me know? Thank you.

Sincerely,  
Jason Whalen

4/C Jason Whalen  
International Maritime Business  
Massachusetts Maritime Academy

Sent from my iPhone

**From:** [Dan Beetz](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Mass. striper harvest  
**Date:** Thursday, March 12, 2020 4:59:36 PM

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For years I fished a Martha's Vineyard charter..nice guy...usually sold fresh tuna onboard he'd caught the night before. He had a no-fish, no pay policy and with five people fishing how could you miss? The last three years we've begun to miss in July. He would always remark how, during the commercial season, he had killed cow bass. Did he feel that killing the spawning stock had any effect? Nope. The fish had just moved north during the same week when they were once common. Well, we've moved north too, to New Hampshire, where the fishing is still not its former self. No blues either. This could be a temporary phenomenon, but logic says killing the spawning stock, like bass and cod means killing the fishery. I know, "Jobs, jobs, jobs," but do you have to kill the last fish in the sea to make a buck? I want to take my grandchildren on a charter with me. Doesn't look like a good time, and we don't kill fish. That's a lost job.

**From:** [Tom Fricker](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** meeting  
**Date:** Thursday, March 12, 2020 2:13:56 PM

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Irresponsible to have meeting. Our govt should be setting an example not shrugging this off.  
Shame!

Thanks, Tom

**From:** [priscilla](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Menhaden Fishery Comments  
**Date:** Wednesday, March 11, 2020 7:36:13 PM

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I am concerned about the changes being considered to the menhaden fishery.

I am a life-long Gloucester second generation fisherman.

After drafting a business plan, and moving forward with it, I acquired equipment and got backing, I am faced with the changes in the regulations to cause me to loose what I have achieved.

Particularly disturbing is the control date of May 1st, which leaves me no chance to qualify and keep my permit viable.

I don't expect to be fully equipped at that time, neither do I expect the menhaden to be migrated to my area by that time.

A May 1st control date will leave a handful of people to monopolize the industry.

Allowing these few permit holders sole access will make for a short season no matter what the quota is.

Most of the bait that is caught here in the early season will be trucked to Maine (and other states) because local lobster men can't consume the large quantity landed at once.

The local lobstermen, are then forced to buy it from out of state dealers, latter in the season at a premium price.

The bigger operations will fish hard in Massachusetts, will catch the Massachusetts quota, and then move on to another state to fish,

In one case, I know of a permit holder whose intentions are to catch the quota here then move on to a state that he has a individual quota leaving the local lobster men with a shortage of bait after they leave. In this case he is entertaining offers to buy his business by out of state company's.

Keeping the industry in Massachusetts will employ more people and keep the revenue in state.

To remedy this problem, lowering the catch limits and allowing more permit holders in the industry to fish a longer season, in turn providing lobster bait for a longer season.

Thank you,

Charles Parisi  
192 South St,  
Rockport Mass.

**From:** [Tom Kelly](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** New striper regulation  
**Date:** Thursday, March 12, 2020 5:33:00 PM

---

Commercial and recreational fishermen should be governed by the same rules . Circle hooks should be used by everyone , the use of gaffs should be banned for everyone . A BIG NO on opening the commercial season early.

Sent from my iPhone

**From:** [Surdel, Dave](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** please do not extend the commercial striped bass season  
**Date:** Thursday, March 12, 2020 11:07:02 AM

---

To whom it may concern,

I saw a notice online that Mass is considering moving the commercial season start up to June 1<sup>st</sup>. PLEASE DO NOT DO THAT! The reason the commercial sector is unable to make quota is because the striped bass are being pounded into extinction by all sectors. The idea that Mass would pander to a very small special interest group (many of whom are out of state) at the expense of the general public is crazy. The 'recremercial' commercial fishery for striped bass in Mass is a joke and everybody knows it. It's a huge problem that leads to overcrowding at the canal and the boat ramps. These are state-funded resources that should not be ruined by the greedy few, many of whom do not pay mass taxes. It also encourages poaching, which is rampant due to weak enforcement.

Mismanagement of the striper stocks by Mass and the ASMFC are the reason we have seen a decline in the striped bass population. Extending the bounty season on the few breeder-size striped bass that remain could be the last nail in the coffin. Mass needs to take a leadership position of conservation and back up the claims they make on the license plates for sale. Continuing to slaughter the dwindling population of adult fish sends the wrong message. It's clear at that point that Mass and the ASMFC have not learned their lessons from the last time they drove the bass population to the brink.

We are on a collision course once again and the conservation steps that have been taken coast-wide are inadequate. The resource-grab attitude by the individual states is sickening. Every year I see tourism decline on cape cod, recreational charters go under and tackle stores go out of business. There is little to no enforcement on the water or at the ramps. If Massachusetts really wants to 'conserve striped bass', they will implement a moratorium and create strict-no kill rules for all sectors (including the charter fleet). They will institute heavy penalties for poachers and increase enforcement on the water and at the boat ramps.

Extending the slaughter season is not the answer and contradicts the edict of 'saving the striper'. Please do the right thing and stop this madness before it's too late.

Dave Surdel  
6 Bayberry Road  
Acton, MA

**From:** [BILL HALLMAN 215 512 9314](mailto:BILL.HALLMAN@215.512.9314)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Please Help to save our Striped Bass  
**Date:** Friday, March 13, 2020 10:08:17 AM

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We strongly urge you to send in your thoughts **IN YOUR OWN WORDS AND ORDER** regarding the 2020 striper proposals and please, **DO IT NOW!**

We know that when emails appear to be from the “same source” they are either discounted or not counted at all so please make the email “your own”...and each voice does matter. Thanks!

Our thoughts on the proposed regulation changes:

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [*J hooks kill no matter who is using them*]
2. The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season before July 1 is wrong. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. The proposed slot limit is acceptable [*the 18% harvest reduction is necessary*]

And although it is not being considered in the proposed 2020 regulations it ought to be required that all commercial striped bass landings be tagged at point of capture and not point of sale as it is now. Current regs are a tacit endorsement of the rampant illegal black market in stripers.

Additionally, requiring that the entire commercial quota consist of large breeder females is counter productive to the attempted recovery of the species.

**From:** [Zachary Whitener](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment on 322 CMR 6.07, 322 CMR 6.18, and 322 CMR 6.07  
**Date:** Wednesday, March 11, 2020 12:31:39 PM

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Good afternoon,

I am writing to provide comment on proposed rules 322 CMR 6.07, 322 CMR 6.18, and 322 CMR 6.07. I a recreational fisherman in Maine and Massachusetts, as well as a fishing guide in Maine who targets striped bass. I am concerned about the status of the striped bass and bluefish fisheries.

I support the proposed slot limit 28-35" in 322 CMR 6.07 for recreational striped bass as it would contribute to the consistency of regulations along the whole East Coast migration.

We have not had any appreciable numbers of bluefish in southern Maine for many years and it is well known that on their way to Maine in the summer bluefish must pass through Massachusetts. I support limiting the daily limits to 3 fish for both shore/private boat fishermen and 3 fish for fishermen on for-hire boats. There is no good argument for having different regulations within the recreational sector; just because some can afford to go with a guide it doesn't mean that they should also be rewarded with a higher bag limit.

I am against the proposed change of the start of the commercial bass season proposed in 322 CMR 6.07. Just like bluefish, bass must pass your shores before they can get to Maine--by starting the season earlier, fewer big fish (that we will catch-and-release with out new slot limit) will come to the coast of Maine. The quota for commercial bass isn't being filled because there are not enough fish, not because there aren't enough opportunities to catch them.

Thank you for you time,

Zach Whitener  
Anadromous Adventures Guide Service LLC



**From:** [Vincent Catalano](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment regarding striped bass  
**Date:** Thursday, March 12, 2020 5:34:15 PM

---

Acting Director Daniel McKiernan,

As a full time fishing guide in the northeast raising a family with two kids and seeing where we are at with the striper fishing at this point in time i urge and beg you to make conservation minded decisions we owe to the fisherman and most importantly the fish... This includes

ALL CIRCLE HOOKS COMMERCIAL & RECREATIONAL

NO GAFF FOR COMMERCIAL & RECREATIONAL

NO EARLY COMMERCIAL STRIPED BASS BEFORE 7/1  
" its killing the big fish were all trying to save with the new regs"

THE PROPOSED SLOT TO TRY AND GET THE 18% REDUCTION

Please do the right thing, Thank you for your time...

Best,

--

Capt Vinny Catalano  
631-766-1695  
[www.longislandflyfishing.com](http://www.longislandflyfishing.com)  
[www.joeyccharters.blogspot.com](http://www.joeyccharters.blogspot.com)  
IG : @JCCHARTERS

**From:** [Edward Purcell](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Ferguson, Kimberly - Rep \(HOU\)](#); [Gobi, Anne \(SEN\)](#)  
**Subject:** Public Comment Striped Bass  
**Date:** Friday, March 13, 2020 11:42:52 AM

---

Dear Commissioner McKiernan,

I applaud the canceling of last night's hearing meeting in light of the health crisis. It is my understanding that public comment will be taken on striped bass through March 16th. I would like to submit the following comments and thoughts as a recreational fisherman who has fished for striped bass (or tried) for over 40 years.

From an anecdotal perspective from someone who spends well over 100 hours on the water each season, the striped bass population is in decline in both numbers and size. I would like to see the most restrictive policies on the taking and keeping of striped bass placed on both commercial and recreational fishermen for this coming season. From what I have read and understand no gaff and circle hook regulations are being considered and I feel strongly they should be put in place for both commercial and recreational taking of striped bass.

Also, I am opposed to any increasing of the season length, number of days or changing of days for the week for commercial striped bass fishing. It is an irrefutable fact that large breeder female striped bass are those targeted by current commercial regulations. From an ecological standpoint this does not lead to a stronger population in the future.

Any regulations going forward need to be first, conservation minded in the best interest of the fish (including considering a lot limit), second, allow sustainable taking of striped bass by recreational fishermen and this allow the handful or two of true commercial fishermen targeting striped bass to continue to meet their financial ends in a way that best protects the fish. For example, tagging at point of catch versus point of sale and a slot limit with a lower quota.

Sincerely,  
Edward Purcell  
15 Sassawanna Road  
Rutland MA

**From:** [Brett Stone](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment striped bass  
**Date:** Thursday, March 12, 2020 3:13:24 PM

---

Hello,

Due to the cancellation of the Mass Maritime public meeting today, I would like to add the following records to public comment. As a recreational and commercial fisherman in Massachusetts, I 100% support the proposals for the Recreational and Commercial modifications in 2020. In addition, in each the last 3 commercial seasons Striped Bass quotas have barely surpassed 65% quota at the end of the season and I would like to see Sunday(s) added as a Commercial Fishing Day. Thank you very much for listening.

Sincerely,  
Brett Stone  
43 Hazelwood Road  
South Dennis, MA 02601

**From:** [Nelson Sigelman](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment  
**Date:** Friday, March 13, 2020 10:26:10 AM

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March 13, 2020

To: Dan McKiernan, Acting Director, Division of Marine Fisheries  
Marine Fisheries Commission

I support the proposal to separate the recreational striped bass slot limit size and the commercial size limit. It is a realistic and straightforward solution to the complexities of regulatory enforcement.

However, the weak link is the ability of recreational fishermen who have no intention to sell their catch to purchase a commercial permit. This is unfair to the recreational fishermen who abide by the rules, and commercial fishermen for whom striped bass is an important source of income.

It is the nature of recreational fishermen, particularly those that cut corners, to brag. Photos will be posted to social media of recreational fishermen holding big fish. It will send the wrong message.

On the other side of the ledger, large fish taken on a commercial permit that do not enter the market will not be reflected in the quota. That is unfair to the commercial sector.

I think there ought to be a threshold for an individual to purchase a commercial permit, or at the very least, renew a permit. That could be evidence of commercial sale in the past, or evidence of income earned in a commercial fishing capacity, for example working in a fish market, on a boat.

At the March 12 DMF public hearing on the Vineyard you provided a graph that reflected a large gap between permit holders and reported sales. At the very least, perhaps this season DMF could send an email to commercial permit holders who reported no sales last year that the endorsement is strictly for the use of commercial fishermen. It is time to address that discrepancy in order to maintain confidence in our fisheries management system.

Sincerely,

Nelson Sigelman  
PO 4530  
Vineyard Haven, MA 02568

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***[Martha's Vineyard Fish Tales](#)***: *How to catch fish, rake clams, and jig squid, with entertaining tales about the sometimes crazy pursuit of fish*

***Martha's Vineyard Outdoors, Fishing, Hunting and Avoiding Divorce on a Small Island***

MV Times Review, Jan. 2, 2018, "[Good Sports](#)"

Vineyard Gazette, May 25, 2018, "[Front Row Seat to the Natural World](#)"

[marthasvineyardoutdoors.com](http://marthasvineyardoutdoors.com)

**From:** [Sam Adams](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Amendment to 322 CMR 6.07 - Striped Bass Commercial Fishing Season  
**Date:** Tuesday, March 10, 2020 7:39:24 PM

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To the Division of Marine Fisheries,

As a lifelong fisherman and conservationist I have watched the decline of the striped bass fishery with dismay. This decline is a product of fisheries policies, many of those by states to our south. You are in the enviable position of being able to act now to help the striped bass. Please do not extend the commercial fishing season in June as is proposed. Doing so will significantly contribute to the decline of this already much-beleaguered species. The gain to commercial fishermen will only be transitory because their haul will diminish next year's haul. Amending 322 CMR 6.07 to extend the season will be stealing from the future for little gains today. It's bad policy.

Respectfully,

Sam Adams

Sent from my iPhone

**From:** [patrick@capecodonthefly.com](mailto:patrick@capecodonthefly.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** comment on changes to commercial and recreational fishing limits  
**Date:** Tuesday, March 10, 2020 10:04:28 PM

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Attn: Acting Director Daniel McKiernan  
Massachusetts Division of Marine Fisheries  
[marine.fish@mass.gov](mailto:marine.fish@mass.gov)  
251 Causeway Street, Suite 400  
Boston, MA 02114

To Director Daniel McKiernan,

I am writing to comment on proposed changes to the commercial and recreational fishing limits to be implemented during the spring of 2020. I reserve additional comments for the scheduled public hearings and will focus here on one of the proposals: the move to open the commercial season for striped bass from June 23 to as early as June 1.

I respectfully oppose such a change for the following reasons.

I have been fishing around Cape Cod for 30 years and recently transitioned to doing so for a living as a guide, primarily focused on fly fishing for striped bass and bluefish from our inshore waters. As you know, both species are overfished and overfishing of striped bass is occurring. While I applaud some of the recent changes intended to reduce the harvest of bluefish in light of its overfished status, management decisions in connection with striped bass by the Atlantic States Marine Fisheries Commission, including allowing states to circumvent the commission's best intentions through the misapplication of conservation equivalency, have been far less reassuring. In light of the fact that a slot limit for the stock is new and as of yet unproven a precautionary approach to interrelated state level decisions is warranted.

I recently attended a workshop about fisheries science sponsored by the Gulf of Maine Research Institute at which National Marine Fisheries Service scientists actively participated and I am generally confident in the science used to arrive at the latest stock assessment. Not only does the striped bass stock assessment point to a fishery in peril if appropriate action isn't taken, the facts on the ground support the same concern, including commercial striped bass landings.

In 2019, the commercial sector in Massachusetts landed only 67 percent of its quota, a continuation of what appears to be a change of course that started the year before when 89 percent of the quota was landed. In each of the previous 13 years listed on the division's website, the quota was either exceeded or nearly met in full, reflecting the improved health of the fishery after the dark days of the 1980s and, presumably, efforts to properly manage the stock across all sectors. That work has clearly fallen off or failed to keep up with environmental conditions and effort, and both the commercial and recreational sectors have suffered for it, as have the fish.

That being the case, everyone needs to do their part to help bring the fishery back before it

approaches the brink yet again. In my business I have changed to a strict catch and release policy for striped bass. While I understand that catch and release mortality is a point of concern, I plan to use the opportunity to educate clients on the proper handling of fish and the facts - good and bad - about catch and release. I am also redoubling my efforts to use the proper equipment to land fish quickly, keep them in the water whenever possible and use only single, barbless hooks for both fly fishing and light tackle clients. The more fish that go back into the water, the more will survive in absolute numbers, even if the catch and release mortality rate increases.

Because I know the outsized role of the recreational sector in harvest through either landings or catch and release mortality, I don't fault the commercial sector for the current state of the fishery. Far from it. I do, however, have concerns with any potential expansion or the full realization of any sector's effect on the stock at this particular and crucial point in time. This includes not only the early opening of the commercial season but also the issuance of commercial licenses in an as-of-yet unlimited entry fishery, the unrealized potential of those licenses already issued (especially in light of the recent correction in world markets and the potential ripple effect on local economies) and the effect of recreational harvest - both legal and illegal - at places like the Cape Cod Canal. The true commercial fishers I know are extremely efficient and, if the fish are available, they will find them. The fish aren't there for a reason, and simply widening the window of opportunity won't change that. In fact, it will likely exacerbate scarcity by putting additional pressure on the large fish the recreational slot limit was intended to protect, especially with decisions made by other states to effectively expand that slot depending on which side of the border you are fishing from. With all these concerns in play, this is not the time to open the commercial striped bass season early in Massachusetts. Keep it at June 23 and continue to focus on educating anglers about the new rules. I know fishermen who have only learned of the slot limit when I've told them and I'm sure there are plenty of others who remain unaware of the changes and who will still be unaware when they hook their first fish of the season.

While other states have taken different approaches to striped bass management, Massachusetts has led the way in attempting to protect the future of the fishery. This includes the early implementation of circle hook regulations, efforts to close loopholes in shore-based commercial fishing that had helped fuel problems along the canal, and the recent letter you and Raymond Kane sent to Rhode Island officials urging them to reconsider their conservation equivalency proposal. Your efforts in your role on the ASMFC have also not gone unnoticed. Thank you. Managing a coastwide stock is never going to be easy. And, while Massachusetts has led in many respects, other states have not been so quick to recognize the role they must play in improving the situation. Rebuilding the stock will take years, longer still because of decisions beyond our control and our borders. Taking this action would be a step backward at a time when we are already falling behind. Please continue pushing forward.

Thank you for your time and feel free to contact me if you have any questions.

Regards,





Regards  
508-246-3757  
patrick@capecodonthefly.com  
capecodonthefly.com



**From:** [Adam Triano](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial striped bass fishing  
**Date:** Tuesday, March 10, 2020 5:51:02 PM

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How can a government agency disrespect a fishery that is already damaged. You didn't make quota last year...why would you  
Kill more...disrespectful...please don't open the season early. Get rid of it. It's dirty mercury bass anyway. Top dollar scam.

**From:** [Jarrod D Stokes](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass Fishing  
**Date:** Tuesday, March 10, 2020 6:10:44 PM

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Hello,

My name is Jarrod Stokes and I am an avid surf fisherman who enjoys the catch and release of primarily Striped Bass. Fishing for this species brings me joy in so many ways but I fear that commercial fishing is posing a threat to this keystone species. I am vehemently opposed to moving up the commercial season and would even like to see further restrictions on recreational fishing. Please help protect this species so future generations can enjoy the thrill of catching Stripers.

Respectfully,  
Jarrod Stokes

**From:** [John asseng](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass Proposal  
**Date:** Wednesday, March 11, 2020 7:43:59 AM

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As a Resident of New Hampshire, I spend a few short days a year fishing recreationally around the Cape and surrounding islands. It concerns me to see the State give more and more to the commercial fishermen simply because they didn't meet a prior year quota. Please do your best to establish management plans that look out for the interest of the resource and not the commercial entity driving your decisions. Opening the commercial season on striped bass early will also affect more northerly states like New Hampshire and Maine.

Thank you for this consideration,

John Asseng  
Marlow, NH

**From:** [Sean Fitzgerald](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped bass season  
**Date:** Tuesday, March 10, 2020 5:53:33 PM

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I who heartedly believe that starting the commercial striped bass season will be detrimental to the already fragile striped bass stock. I totally against this.

Respectfully  
Sean Fitzgerald  
Sent from my iPhone

**From:** [Ryan Conceicao](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Early Striper Season  
**Date:** Tuesday, March 10, 2020 8:31:59 PM

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To Whom it May Concern,

If you allow the striped bass commercial fishing season to start early before the larger migratory fish are able to travel up the northeastern coast to NH/ME, you are no better than the Jersey scum that destroys the striper population. Rather than contributing to conservation, you are destroying the future generations of the game fish that represent the northeastern states. Please work towards conservation.

Best,

Ryan

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Striped bass fishery  
**Date:** Wednesday, March 11, 2020 7:27:11 AM

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**From:** Chris Fatzer <chris.fatzer@gmail.com>  
**Sent:** Wednesday, March 11, 2020 7:23 AM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Subject:** Striped bass fishery

I am very concerned about the state of the striped bass fishery and want more conservative management measures, not less. Allowing earlier harvesting will deplete an already depleted biomass. Please do not allow an earlier commercial harvest. We all as fisherman need to conserve our fisheries and I believe not allowing an earlier commercial harvest will help ensure the fishery stays healthy for future anglers.

Sincerely  
Chris Fatzer

**From:** [jakenichols@maine.rr.com](mailto:jakenichols@maine.rr.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposal Concerns  
**Date:** Tuesday, March 10, 2020 10:58:12 PM

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Dear Director McKiernan,

I'm writing to express my opposition to the proposal to open the Massachusetts commercial striped bass harvest earlier than June 23, as I am gravely concerned about the current state of the striped bass fishery and even more afraid of where we will be three years from now. I have been a resident of Maine for my entire life, and have lived on the ocean fishing recreationally for striped bass since elementary school. The decline in the quantity and quality of the striped bass that reach our summer waters has been evident for years now.

Many are quick to blame the commercial guys, but those who really pay attention know that this is a collective effect of both commercial and recreation. I have done all that I can to educate myself and others on proper fish handling and ways to fish with the utmost respect for the resource. I fear this proposal will take away a large number of those fish that myself and so many other Mainers have dedicated their lives to pursuing and protecting. I have found that the tight knit community of recreational fisherman in this state has greatly improved their conservation efforts over the years, and would love to see our commercial counterpart have the foresight to make decisions that will allow us both to profit not only financially, but emotionally for years and years to come.

When I see that ONLY 67% of the quota was met last year, I feel extending the season is only a foreshortened idea and a short term fix that will be DETRIMENTAL in the long run. I am sure that this low percentage of catch is not due to the time spent on the water, but an overall decrease of numbers and size of fish available. If given more time to harvest these fish on their journey to my beloved state, it may satisfy the quota this year, but the amount of fish that are continued to be taken out of the system will only compound on itself, and before we know it, we may have destroyed the resource that so many depend on.

I would like to state that I am not against commercial fishing, I believe it is an integral part and embedded in the rich history of the Atlantic coast and many people rely on it to support their families. I understand the logic behind the argument that commercial striped bass anglers have an approved quota and thus should be allowed more opportunity to harvest that quota, but I don't believe it would be a prudent management decision if we wish to preserve this resource for our children to enjoy.

Retaining the June 23rd opening of the commercial season sends a signal to all stakeholders that you and the Massachusetts DMF are committed to taking steps in the best interest of rebuilding this fishery. The measurable decrease in commercial harvest landings in 2019 and 2018 are a message that should not be ignored. I heard resounding approval of your organization's 2019 decision to keep the open commercial harvest days at two when it was clear that we wouldn't reach the quota cap. My understanding is that the decision was based in part upon the volume of public comments opposed to adding the third day. Your organization listened to public input last year and I hope will do the same this year.

Respectfully,



Jacob Nichols

**From:** [bg brown](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** proposal for menhaden fisheries  
**Date:** Tuesday, March 10, 2020 6:11:21 PM

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Dear Daniel McKiernan,

My name is BG Brown. I'm a commercial fisherman out of Gloucester. I have recently participated in the open access menhaden fishery using a purse seine and have made plans on scaling up my operation. I have invested in thousands of dollars of equipment for the upcoming season and now the permit I was interested in buying may become useless if a control date is set before there any fish around to get landing history on the permit. I know at least one other fisherman in the same boat I'm in. I understand the need to eliminate some of these permits to maintain a viable fishery. As it stands now there are one or two big players in the fishery and i'm sure they don't want to see any new faces in the industry. It seems wrong that a couple of individuals more or less control the entire fishery. I have participated in lots of different fisheries over the years and the menhaden fishery is like most, it's a volume fishery. My ask would be to set the control date for midsummer sometime, allowing for new participants to have access or what i would rather see (because i don't agree with volume fisheries) is to keep the open access permit(6000lb/day) open even after the big players land the quota in 15 fishing days. 6000 pounds a day is just enough to make a little bit of money and catch my own lobster bait when the demand picks up in August. I thank you for your consideration.

Sincerely,  
BG Brown  
F/V Kathryn Leigh

**From:** [Henry Onli](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposal to start commercial fishing season earlier  
**Date:** Tuesday, March 10, 2020 6:01:10 PM

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I do not know the appropriate way to write this.

But i, as an individual absolutely OPPOSE the proposal to start the commercial season on June 1st (instead of June 23rd)

As i believe this will affect the future of the fishery in a negative way.

Please reconsider!

Henry Leoncio

**From:** [Robert Percy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed early open to commercial bass fishing  
**Date:** Tuesday, March 10, 2020 7:22:47 PM

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Hello,

I am emailing you to express my disagreement with the proposed early open of commercial bass fishing. With the population already in decline they need all the time they can get to spawn, maybe keeping the season open later would be a better option.

Thank you,  
Robert Percy

**From:** [Bryan Rosa](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Commercial Striped Bass Regulations  
**Date:** Monday, February 24, 2020 8:38:51 PM

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Daniel McKiernan,

The Massachusetts public hearing notice LITERALLY states, "...ASMFC has reduced the states' coastal commercial quotas for striped bass by 18% to end overfishing." To open the commercial season early is possibly the most foolish thing I've ever heard. The quota was not met in previous years for one reason and one reason alone—a lack of fish.

It's pathetic and downright disgusting to see that there are individuals saying the commercial season should open early, in the same paragraph that states striped bass are being over fished.

I understand people make a living by commercial fishing for striped bass, but opening the season early is only going to eliminate what little stock we have left. It is a much smarter and long term business plan to throttle back at this time and be smart about harvesting so that both recreational and commercial fisherman can continue to utilize this wonderful species were fortunate enough to have in our backyard.

Sincerely,

Bryan Rosa

**From:** [Andy Wills](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 fishing  
**Date:** Saturday, February 15, 2020 12:11:48 PM

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I believe that we should not let any of the bans up... We are trying to preserve the future... We need to give the ocean more time before we ransack all that she gives us once again... How about some catch-and-release policies ? may be no treble hooks? Make some bodies of water barbless? we must do everything we can to preserve our planet because she is not happy with us humans... And guess what the greatest threat to humanity Issss humans ....in all our ignorance.... Sorry yes I am for protecting all the fish for as long as possible....  
Thank you and have a great weekend  
Andy

**From:** [Lou Bartolotta](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 MA STRIPED BASS REGULATION PROPOSALS  
**Date:** Tuesday, February 25, 2020 9:56:19 AM

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**TO: Acting Director Daniel McKiernan**

**Dan;**

**First, thanks for all the hard work on developing the new proposed regs for 2020's striped bass fishing. Personally, I fully support the position taken by Stripers Forever which is defined below;**

**Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

**Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

Thanks  
Lou Bartolotta  
Tight Lines



**From:** [Rick Hickox](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 MA Striped Bass Regulation Proposals  
**Date:** Sunday, March 1, 2020 9:04:29 AM

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Mr. McKiernan:

I'm writing to express my support for the positions taken by Stripers Forever regarding the proposed regulations to help preserve striped bass stocks. It is critical for all states to take significant steps to reverse the long decline in numbers and quality of these fish. Specifically, I support the following comments:

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, "I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong." -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial "part-timers" (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

Thank you for working to preserve this fishery.

Sincerely,  
Rick Hickox

**From:** [George Jacobi](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 striped bass regulation proposals  
**Date:** Tuesday, February 25, 2020 10:25:42 AM

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Dear Director,

Please excuse the sloppy copying of my concerns regarding the striper fishery in MA. I add this comment, and hope you take it with the seriousness it expresses. Before I retired, I sold tackle across New England for a wholesaler. Some of my customers were also commercial weigh stations for the MA bass fishery, and I consistently heard comments such as “they all cheat” referring to high grading. In other words, for how many large cow bass were sold commercially, there were God knows how many tossed overboard dead as soon as a bigger one was caught. These guys telling me were the guys that knew the reality of the situation. Thus while I support the end of commercial fishing entirely, I must add that the “no gaff” amendment for commercial fishing will have a positive effect right now – and is desperately needed if a total ban cannot be implemented. I repeat, “They all cheat.”

Thank you,

George Jacobi

Mansfield, CT

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks
6. We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.
7. Whether you are a MA resident or visit to fish for Striped Bass, thanks for reading and hopefully see you at one of the hearings (see schedule below) in addition to your sending an email expressing your concerns/input. Please put your personal thoughts into your own words and send an email to Acting Director McKiernan. Thank you!

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

Dear Director McKiernan:

As a commercial fisherman of striped bass since 1976, I would like to make a few comments relative to proposed changes on striped bass commercial fishing.

I am of the belief that "if it ain't broke, don't fix it" as far as commercial fishing for striped bass is concerned. I also believe that the health and management of the fishery is more important than the filling of the quota. We have been fishing under the current commercial regulations for quite a while, and I believe that they have served the commercial fisherman well. We should continue with our current starting date for commercial fishing so that the fish have had time to settle around the state. Opening earlier will just flood Cape Cod Bay, the canal, and P-town with hundreds of boats when I believe it is better to spread the commercial fleet to different sections of waters where 34" fish are available around the whole state. I fish commercially around Monomoy Island and the Chatham area, and it is my experience that fish large enough to sell don't arrive until around Father's Day. Opening the season on June 1 will put undue pressure on Cape Cod Bay and the canal, where the fish are already being pounded by recreational and commercial fishermen.

Historically, it appears that the continual fishing pressure of a certain area is not beneficial for the fishery—case in point, the continual pounding of fish on Handkerchief Shoals, Sandy Neck area in the bay, and the area north of Chatham Lighthouse. These areas are no longer as good as they used to be due to the intense pressure that was put on them for a number of years.

I really don't understand why changing the size limit and changing the days of fishing are beneficial to then improvement of the fishery. It is hard enough catching a 34" keeper, and increasing the size to 35" will just mean that more fish will be caught and released to catch a keeper. I do agree, though, that lowering the size limit "would likely drive more participation in the fishery than the current 34" size" and would affect the current quota. The Monday/Thursday fishing days have enabled commercial fishermen to get a decent price for their catch. Why change something that is working fine?

Hopefully, some of my comments mentioned here might be helpful in any hearings on striped bass commercial fishing. I would like to thank the Division of Marine Fisheries for doing a great job in helping us to manage our fishery. I know it is not easy. Thank you very much for your consideration on this matter.

Sincerely,



Richard Cotti  
402 Fuller Street  
Ludlow, MA 01056

maureen50@charter.net

From: Edward Horowitz horowitz.es@live.com  
Subject: Fwd: Advisory: Winter 2020 Public Hearing Notice  
Date: Feb 8, 2020 at 3:01:20 PM  
To: Judy Horowitz horowitz.je@icloud.com

Sent from my iPhone

Begin forwarded message:

**From:** Edward Horowitz <[horowitz.es@live.com](mailto:horowitz.es@live.com)>  
**Date:** February 8, 2020 at 2:34:38 PM EST  
**To:** "[marine.fish@public.govdelivery.com](mailto:marine.fish@public.govdelivery.com)"  
<[marine.fish@public.govdelivery.com](mailto:marine.fish@public.govdelivery.com)>  
**Subject:** Re: Advisory: Winter 2020 Public Hearing Notice

I have had an opportunity to review the proposed revised regulations. I am a recreational fisherman living full time on Cape Cod and have seen a significant decline in the number of larger striped bass. Last year was the worst striped bass fishing on the Cape in many years.

The recreational proposals seem reasonable as long as all recreational, including charter boats are made to comply in all of the Atlantic Coast States. As for commercial fishing there should be a moratorium on all striped bass until the stock rebuilds itself. As for horseshoe crabs, the stock seems to be decreasing which affects bird life and therefore there should be a moratorium on any horseshoe crab taking. As for large striped bass being somewhat dependent on menhaden I would drastically reduce the amount of menhaden allowed to be taken, especially by large commercial fishing boats.

Thank you

Edward Horowitz

*Edward Horowitz 2/9/20*

Sent from my iPhone

On Feb 8, 2020, at 7:43 AM, "[dwm4750@yahoo.com](mailto:dwm4750@yahoo.com)"  
<[dwm4750@yahoo.com](mailto:dwm4750@yahoo.com)> wrote:

**From:** [Captain Joe LeClair](#)  
**To:** [Robert Jr. Popeo](#); [Paul Popeo](#); [Hap Ellis](#); [nick greville](#); [nick crocker](#); [Greg Benning](#); [Robbins, Gregory K.,M.D.](#); [greasybeaks@icloud.com](#); [lightfly@gmail.com](#); [Sam Barnard](#); [David von Jess](#); [Alan Steinert](#); [Steve Woodsum](#); [Kessler, Ross \(FWE\)](#); [Joe Wright](#); [ned kittredge](#); [William Ducas](#); [Mike Porco](#); [Matt Bickford](#); [Captain Allan Got Strypr](#); [Crosby Beane](#); [john marabello](#); [Thomas & Thomas](#)  
**Cc:** [Fish, Marine \(FWE\)](#)  
**Subject:** Advisory: Winter 2020 Public Hearing Notice  
**Date:** Friday, February 21, 2020 10:36:10 AM

---

Acting Director Daniel McKiernan

This motion is a joke, puts large striped bass that are headed for maine and other points north at risk as well. We do not get our resident fish until the end of June. With the season the way it is now we are depleting one segment of the mature population. If we shift it around and keep it open into september we are going after different fish. This is only necessary because we dont have enough of our own fish in the size class comercial fisherman are targeting. These dates should not be changed !

Captain Joe LeClair  
North Eastern Anglers  
[www.flyfishsalt.com](http://www.flyfishsalt.com)

**Subject:** FW: Advisory: Winter 2020 Public Hearing Notice

Joe-

There is a motion to shift comm bass season to June 1 as opposed to the June 23 date from last year.

---

**Subject:** Advisory: Winter 2020 Public Hearing Notice

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February 7, 2020

## Advisory: Winter 2020 Public Hearing Notice

The Division of Marine Fisheries (DMF) has scheduled public hearings and a public comment period to solicit feedback on proposed changes to commercial and recreational fishing limits to be implemented during the spring of 2020. These proposed regulations affect:

- bluefish recreational possession limits;
- striped bass recreational size limits, circle hook mandates, and the use of devices to remove striped bass from the water;
- striped bass commercial seasons, fishing days, and size limits;
- black sea bass commercial possession limits and bycatch allowances;
- summer flounder commercial possession limits;
- menhaden commercial possession limits and permitting;
- horseshoe crab commercial bycatch allowances;
- sand lance commercial possession limits;
- sea herring days-out management and spawning closures in Area 1A; and
- other regulatory housekeeping items.

The full public hearing notice is available [here](#). Additionally, the public hearing notice, draft strikethrough regulations and other pertinent documents are available on the agency's [webpage](#) dedicated to proposed regulations.

DMF will accept written public comment on these proposals through 5 PM on Monday, March 16, 2020. Please address all written comments to Acting Director Daniel McKiernan and submit to DMF by e-mail at [marine.fish@mass.gov](mailto:marine.fish@mass.gov) or by post to 251 Causeway Street, Suite 400, Boston, MA 02114. In addition, DMF will hold three public hearings throughout the Commonwealth. The public hearing schedule is below:

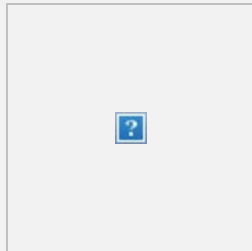
## Public Hearing Schedule

**March 10, 2020**  
6 PM  
Coolidge Middle School  
89 Birch Meadow Drive  
Reading, MA 01867

**March 12, 2020**  
9:30 AM  
Tisbury Town Hall  
Katharine Cornell Theater  
51 Spring Street  
Vineyard Haven, MA 02568

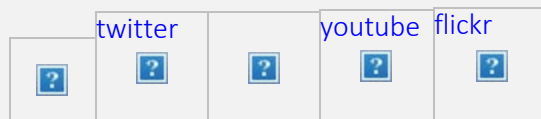
**March 12, 2020**  
6 PM  
MA Maritime Academy  
Admiral's Hall  
101 Academy Drive  
Buzzards Bay, MA 02532

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### Massachusetts Division of Marine Fisheries

251 Causeway Street, Suite 400, Boston, MA 02114  
(617) 626-1520 | [Contact Us](#) | [Find a Location](#)



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**From:** [Celia Rapp](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** attn: Daniel McKiernan  
**Date:** Monday, February 24, 2020 9:42:30 PM

---

Dear Mr. McKiernan,

I am reaching out to express my concern for the Striped Bass industry and stock for the 2020 season, and future seasons to come after reading your proposal. The trends, for some time now, have been decreasing, and opening up the season to extend commercial fishing to an already depleting population of fish is simply irresponsible. I fear that an extended season will only continue the downward trend, and further hurt the Massachusetts natural ecosystem, as well as the massive tourist industry associated with chartered fishing and local recreational fishing.

Data is showing us that the striped bass numbers are decreasing--as evidenced by meeting only 67.4% quota in 2019, and 88.9% in 2018. As much as we would like to argue that extending the season will help MA reach its quota, the reasonable and logical explanation is that we are overfishing. I would hate to see these numbers dip even further in years to come, and choke out the industry all together.

Please, I ask you to reconsider this proposal, and work together to conserve this precious species, and all of the positive things it brings to our states, and New England as a whole.

Sincerely,  
Celia Rapp

--

Celia Rapp, BSW  
Simmons University, '21  
Providence College, '16  
C: 508-364-0738  
[celia.rapp@simmons.edu](mailto:celia.rapp@simmons.edu)

**From:** [fastgrab11](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Bluefish recreational bag limit  
**Date:** Friday, February 7, 2020 3:41:54 PM

---

I strongly believe the new regulations regarding bluefish should have the creel limit at 5 fish of any size. Or have slot sizes of 10 fish under 14" and 2 fish over 21", all other sizes being illegal to harvest.

Sincerely,

Modusser Parwaz

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Richard Crafts](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Clients aboard Charters  
**Date:** Tuesday, February 25, 2020 8:22:07 AM

---

Good morning,

First, please let me thank you and your staff and members for all the continued help with our plight. As a life long salt water fisherman who has traveled from NH and the last 40 yrs from VT, I do so hope in my remaining years [72] that i see some improvement in the Breeding size / age class. For the last 20 yrs i have been traveling down to the Cape for 3 different trips of 12 days each staying at local motor inns. Out of staters bring alot of \$\$\$ to the state's waters and as you must guess i am not a fan of commercialism in any form. Yes the rec fisherman's probably accounts for the biggest mortality rates, but i am having a really tough time with the **PROPOSED CLIENTS OF CHARTERS GETTING TO KEEP TWO KEEPERS.**

Thank you for your time  
Richard H Crafts  
Manchester, Vt.

**From:** [Mike Spinney](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comment on Proposed Changes to Marine Fishing Regulations  
**Date:** Friday, February 14, 2020 8:44:02 AM

---

To the Department of Marine Fisheries -

Thank you for the opportunity to comment on the proposed 2020 marine fishing regulations. I am writing specifically on the issue of commercial and recreational striped bass.

First, I would like to express my appreciation for the Division's stand on the recreational striped bass fishery. Adopting the recommended slot limit changes and taking a leadership position on the use of circle hooks sets a good example for other states.

As for the proposed changes to commercial regulations, I am opposed to opening the commercial season early. I recognize the change is intended to help commercial fishermen to meet the quota, which they failed to do the last two years, but at a time when the striped bass stocks are known to be in jeopardy, I think increasing the effort is the wrong move.

June is a critical period of northward migration and many of the larger fish caught here early in the month are passing through to New Hampshire and Maine. It's also true that our commercial fishery is focused on breeding sized females and so that effort has long-term effects on the health and future of the fishery at a time when we are trying to reverse course and improve recruitment, reduce mortality, and restore stocks to an abundant and sustainable level.

Please reconsider this proposal in recognition that, if the commercial effort is unable to fill its quota, perhaps that is because the fishery is unable to sustain the quota.

Thank you.

Mike Spinney  
Townsend, MA  
978 660 4053

**From:** [Randy Sigler](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comment on public hearing items  
**Date:** Friday, February 7, 2020 4:42:58 PM

---

Dear Director McKiernan,

The following are thoughts regarding the upcoming public hearing items.

### **1. Recreational Striped Bass:**

**A. Slot Limit:** I fully and enthusiastically support a slot limit of 28" - 35". As a charter operator running over 800 trips a season for striped bass, this slot limit will dovetail very well with the conservation ethic we embrace, and make it mandatory that the large, breeding females be released. I do foresee any negative consequence for our business due to adopting this new approach.

**B. Circle Hooks:** I fully support a circle hook requirement for all natural bait fishing for striped bass. Again, I see this complementing our conservation goals, and do not foresee any negative consequences by implementing this requirement for all sectors, including for-hire.

**C. Non lethal devices:** Yes ... fully agree with this proposal !!!

**2. Recreational Bluefish:** I fully support reducing the recreational Bluefish bag limit. Three fish per day is plenty for any recreational angler to harvest. I would also fully support adopting the three fish bag limit for for-hire anglers. Furthermore, I would support a vessel limit ... say 6 or 10 fish? In our North Shore waters, bluefish have been quite scarce the last few years. When they are present, it is generally very easy to put many fish in the boat. Bluefish does not store or freeze well, and we advise clients to take only what they can eat fresh (or smoke) that day ... and one or two fish is generally more than enough for them.

**3. Commercial Striped Bass:** In support of all proposed changes.

### **7. Commercial Menhaden:**

**B. Replacing 1,000 lb "incidental" limit:** I am uncomfortable with this replacement. I do understand the value of this fishery for the local lobster fleet, however, I believe this provision creates an unenforceable dilemma. Last year, after the 6,000lb limit was triggered, we continued to see "small scale" purse seiners netting menhaden in large quantities. The typical approach is that the vessel would make a set over a large school of Menhaden, and fill the net. They would then load the boat first (typically into a hold or into a partitioned portion of the deck ... NOT into boxes), and then anchor with the net (still very full) tied alongside the boat. At this point, the lobster boats would come along the other side and take barrel after barrel of bait from the seiner. During lulls, the seiner would load more bait from the net onto the boat.

This creates several enforcement problems. One is that there is no way to measure the quantity of Menhaden that has been retained, or how much has been sold. Additionally, in the absence of enforcement present, the seiner can keep "live" bait alongside the boat replacing what they have sold in order to keep the "retained" portion within range.

I spoke with M.E.P. officers last year during the 6,000lb limit time, and they concurred that it was not something that they could/would check.

I would prefer that once the harvest has reached 100% of quote, that the “incidental” limit remain at 1,000 lbs.

**8. Sand Lance:** I fully support a limit on sand lance harvest. The sand lance represent an incredibly important forage fish for all of the valuable commercial species that we pursue recreationally and commercially. This type of forward thinking protection is exactly what needs to happen. Thank you for this!

As always, a big thanks to all DMF staff for their tireless dedication to protecting and managing the marine resources of the Commonwealth.

Sincerely,

Randy Sigler  
Sigler Guide Service  
1 Peabody Ln  
Marblehead, MA 01945  
[www.Striper.com](http://www.Striper.com)  
[randy@striper.com](mailto:randy@striper.com)  
617-459-1798

**From:** [Tim Petracca](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comments on 2020 DMF - Striper, Black sea bass  
**Date:** Saturday, February 8, 2020 6:04:37 PM

---

Hello Director,

Thank you for providing information via email. I cannot attend public meetings due to being out of state during those dates, so here are my written comments:

**With Regard to Black Sea Bass:** With increase in Quota, would it be possible to allow Rod and Reel Shore-based Commercial Fisherman, like me, who fish Striper and Scup via Endorsements to purchase an Endorsement for Black Sea Bass? Seems like I call DMF and they say “no endorsements are available.” If Quota is increased, how about giving shore-based rod and reel folks, like me, a chance to buy an Endorsement for BSB for 2020?

**With Regard to Proposed Strikethrough Language for Winter 2020 DMF Public Hearings:**

Striped Bass Fishery 6.07

Closed Commercial Fishing Days section: Second Thursday in the sentence needs to be deleted and replaced with Wednesday.

Length: Need to define how to measure the fish. (Not over the curve of the fish, but laid flat.)

4 (c) – Second 34” in the paragraph needs to change to 35”.

5 (d) – Needs to be re worded to reflect slot system.

5 (f) – Why do you need the words “Effective Jan 1, 21, this shall apply to all recreational anglers,” as the first sentence already applies to all effective on Jan 1, 2020.

**With Regard to your December 13, 2019 memo:**

Again, the procedure to properly measure the fish needs to be clearly defined.

Thank you for great work and communication and I would sincerely appreciate a response on my Black Sea Bass endorsement inquiry.

Tim

**Timothy J. Petracca, Sr**

C: 435-901-0831

E: [Tim.Petracca@ppcpackage.com](mailto:Tim.Petracca@ppcpackage.com)



Scanned by [McAfee](#) and confirmed virus-free.

**From:** [Richard McGlynn](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comments on proposed changes to commercial and recreational fishing  
**Date:** Tuesday, February 18, 2020 3:16:59 PM

---

Mr. Daniel McKiernan,  
Below please find my comments on the respective proposed changes:

### **Regarding the Proposal to Adjust Recreational Striped Bass Limits**

The suggested slot limit of not less than 28 inches and not greater 35 is not the answer. If striped bass are truly in jeopardy than raise the size limit for everyone to a 32 inches or greater or even go back to the 36 inch limit that brought them back from near extinction some years ago. Putting more pressure on the recreational area and allowing commercial fisherman to make up the difference isn't helping anyone especially the striped bass. Keep one size limit for everyone. If the commercial group has only landed 67% of their allotment in pounds then perhaps lowering their size limit to 32 (rather than increase it to 35 allowing commercial fisherman to retain all the larger fish) will help them keep more fish and satisfy everyone. Allowing the commercial group to keep larger fish and restrict the recreational group is unfair.

### **Regarding the Proposal to Adjust Recreational Black Sea Bass Limits**

It appears to me that once again the regulations are in favor of the commercial group which in itself is understandable. However in my humble opinion the size limits should be consistent once again. I'm of the understanding that for the commercial group it is a minimum 12 inch requirement with various levels of weight dependent restrictions while the recreational angler has 15 inch limit with a 5 fish bag limit. Again, lets keep the size limit consistent between groups.

### **Regarding the Proposal to Adjust Period II Summer Flounder Trawl Fishery**

I'm at a loss in understanding the rational behind increasing limit amounts for the commercial group as soon as a species appears to be on the rebound. I can't talk intelligently about summer flounder or fluke south of Cape Cod as my recreational fishing has been on the North Shore of Massachusetts for over 40 years. All I know is that in recent years I've been hard pressed to catch my 5 fish bag limit of 17 inches and over and if I can't meet this by the middle or end of June I'll have to wait until next year. Please give the recreational guys a break and leave this one alone.

### **Regarding the Proposal to Adjust Recreational Blue Fish**

I think most recreational fisherman may be OK with this one as most of us only take what we can or will eat and in the case of the bluefish I personally only want one for the table. Reducing the bag limit is probably a good idea, however this particular fish may be one that



could use a slot limit as the smaller “snapper blues” once common to Long Island etc. are more edible than the bigger blues. Also can someone explain to me how a stock can be overfished but not experiencing overfishing?

### **Regarding the Proposal to Temporarily lift the State Waters Groundfish Closure**

Personally I think this is a bad idea. I abhorred the idea of a moratorium on codfish last year however I noticed that while offshore there were more small cod that were “by-catch” while haddock fishing. In My Humble Opinion let’s suffer one more year with a moratorium for the season, let the fish really recover than open the season next year with a 24 inch minimum for cod. Also try to consistent once again. Reducing the size limits a few years ago then increasing it again at the end of the year was not only irritating I think it may have made matters worse as it appeared to lead to the moratorium leaving us to wonder if NMFS really knows what they are doing.

Please let me know if there is anything else I can do to help.

Best Regards,  
Rich McGlynn  
Miles From Nowhere  
Doc # 1283573

**From:** [John Bachner](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass (322 CMR 6.07)  
**Date:** Tuesday, February 25, 2020 7:19:38 AM

---

Daniel McKiernan,

The Massachusetts public hearing notice LITERALLY states, "...ASMFC has reduced the states' coastal commercial quotas for striped bass by 18% to end overfishing." To suggest opening the commercial season early, in the same paragraph that confirms over fishing, is possibly the most foolish thing I've ever heard. The quota was not met in previous years for one reason and one reason alone—a lack of fish.

In 2018 the quota (88.9%) was not met.

In 2019 the quota (67.4%) was not met.

It's pathetic and downright disgusting to see such a lack of responsibility come from our state, especially following a downward trend in commercial landings for the past two seasons.

Sincerely,

**- John Bachner -**

**From:** [John Bachner](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass (322 CMR 6.07)  
**Date:** Tuesday, February 25, 2020 7:19:38 AM

---

Daniel McKiernan,

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In 2018 the quota (88.9%) was not met.

In 2019 the quota (67.4%) was not met.

It's pathetic and downright disgusting to see such a lack of responsibility come from our state, especially following a downward trend in commercial landings for the past two seasons.

Sincerely,

**- John Bachner -**

**From:** [Germain Cloutier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass Proposal  
**Date:** Monday, March 9, 2020 9:10:43 PM

---

Hello,

Please consider NOT moving the commercial striped bass start date to June 1st instead of the usual date of June 23rd. The current state of the Striped Bass Can NOT afford more pressure. As we all know the stocks have been deemed as overfished and taking measures to try and prevent this from getting worse are in place, with the 18% reductions. By changing seasons/adding fishing days then these measures to try and help the stocks rebound will not work if more harvesting is allowed, especially the harvesting of the big breeder sized fish. There seems to be the stigma of “catch and release mortality” that the commercial fleet tries to use to gain their interests. But the facts are the commercial fleet is harvesting the big breeder fish that the recreational sector can not anymore. And while the commercial fleet is harvesting these larger fish( that are becoming harder to find as shown by the past few years of not meeting the quotas) they are throwing back the smaller fish and those fish will be dying as well. What it boils down to is we need to not change too many things right now, hopefully the current measures in place will help the stocks rebound. But to Move the Start of the commercial striped bass Season to June 1st would NOT be in the best interest for anyone. I know that Massachusetts representatives sent letters to Rhode Island to tell them to take a more conservation minded approach towards striped bass, But the fact is that we need to Keep Conservation at the top of the list here in Massachusetts as well. A lot of guides, bait shops, restaurants, etc. depend on people coming to fish for striped Bass. There is a lot more Worth to the State in the recreational sector then the commercial sector. Thank you for your Time.

Sincerely,  
Germain

[Sent from Yahoo Mail for iPhone](#)

To: DMF Acting Director Daniel McKiernan  
From: Stephen O'Grady, Orleans, MA  
Re: 2020 proposed changes to commercial and recreational fishing limits  
Date: February 15, 2020

Dear Mr. Daniel McKiernan,

I am submitting a comment on the draft regulatory amendments to 322 CMR §§6.00, 7.00 and 9.00, as I will be unable to attend the public hearings this winter.

I am currently a recreational fisherman on Cape Cod, formerly fished commercially out of state, and formerly did shellfish aquaculture in Barnstable, MA. I received my BA from Colby College in Environmental Science with a concentration in Conservation Biology and took several classes on fisheries management. I thank you for the opportunity to comment and for your consideration in the management of our precious marine resources.

I write to comment on each of the below:

**Recreational Bluefish (322 CMR 6.18):** I support changes to reduce the catch limit to 3-fish per day for anglers fishing from shore or a private vessel. I do not understand why the limit would be different for for-hire vessels, and I think the limit should be consistent across the fishery, especially considering that bluefish do not “freeze well” and 3 fish for recreational anglers should be plenty.

**Recreational Striped Bass (322 CMR 6.07):** I support the adoption of a 28”-35” slot limit. If the population is to recover, we need to protect the larger fish, which are well understood to be the most valuable breeders. Additionally, it’s very important that we have consistency across the New England coastal states, as we know striped bass are highly migratory, and one state having a 28”-35” slot limit, while the neighboring state has a 35” minimum size limit, for example, defeats the purpose of the regulations of protecting a specific age class and size class. All the New England States, including MA should be adopting the suggestion of the Atlantic States Marine Fisheries Commission. Consistency in management is valuable!

I do not support the illegalization of tube and worm fishing and snag and drop. These methods seldom account for gut hooking fish, which of course is the intention of the circle hook regulations. They are important techniques for recreational fishermen to be able to employ.

I support the proposed non-lethal device amendment. I’m confident that the vast majority of stakeholders agree that this amendment is a wise one.

**Commercial Striped Bass (322 CMR 6.07):** I cannot support the continued existence of a commercial striped bass fishery. This striped bass’s importance to our state and the

recreational fishing based economy cannot be overstated. As you know, the stocks have been declared overfished, and overfishing is occurring. I understand that the stocks have been overfished for 11 of the last 13 years. A basic understanding of fisheries management history provides one with no shortage of examples of managers doing too little too late for many economically valuable and culturally important species. **NOW is the time to act** and to close the commercial fishery.

While I understand that the commercial fishery is responsible for only about 10% of the mortality of the stock, the large majority of those involved in the commercial fishery are recreational fishermen who take advantage of the commercial opportunity to earn some extra cash. Livelihoods are not at stake here.

Additionally, this is an example of a select few benefitting disproportionately from the exploitation of a *public resource*. This is as easy a decision as a commercial moratorium on the take of striped bass can be.

While I feel strongly that the commercial fishery should be closed, if the decision is made to leave the fishery open, having a minimum size limit of 35" while the recreational fishery has a slot limit of 28"-35" defeats the entire purpose of a slot limit. The commercial fishery, if kept open, should have the same slot limit that the recreational fishery has.

**Commercial Black Sea Bass (322 CMR 6.28):** I support all proposed changes and have no comment on the days of week that the fishery is open. Keeping the weir fishery in existence should be a high priority, as it can be done sustainably (hardly any discard mortality, minimal habitat impacts, and relatively low fuel consumption), and is culturally and historically valuable.

**Commercial Horseshoe Crab Trawl Limits (322 CMR 6.34):** I support the establishment of an open access incidental limit of 75 crabs for trawlers who do not hold a limited entry horseshoe crab permit. However, this fishery should be managed very conservatively, given the critical importance of healthy horseshoe crab populations to migratory shorebirds and also to the biomedical industry. I hope DMF and others are looking at ways that we can reduce the bycatch of horseshoe crabs in trawl fisheries.

**Commercial Menhaden (322 CMR 6.43, 7.01, 7.04 and 7.06):** I do not support rescinding the 95% quota trigger that reduces the limited access fishery's trip limit to 6,000 pounds. The 95% quota trigger should remain in place, to ensure that bycatch allowances are not enabling harvest over the sustainable quota. DMF and ASMFC work hard to determine the sustainable level of harvest, and allowing for harvest (in the form of bycatch) after 100% of the quota is filled undercuts those efforts and may be detrimental to the future health of the resource. The 95% quota trigger allows for a "cushion," safeguarding the resource for future use.

I strongly support a requirement that all limited entry menhaden fishery permit endorsements be owner/operator.

**Sand Lance (322 CMR 6.42):** I support the proposal to adopt a 200-pound possession and landing limit for sand lance to prevent the proliferation of an industrial fishery while allowing traditional bait harvest activity to continue to occur.

In closing, all of these management decisions involve a good bit of guesswork and uncertainty. That is the reality of marine fisheries management. The fact that the Gulf of Maine is warming faster than 99% of the world's oceans only adds to that uncertainty. Managing our public marine resources conservatively is the soundest approach to ensuring that future generations will have access to the same resources that we enjoy today. Thank you for your work.

Sincerely,

Stephen O'Grady  
Orleans, MA  
ogrady.stephen3@gmail.com

**From:** [Levi Opsatnic](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Do Not Start Commercial Season Early  
**Date:** Monday, March 9, 2020 3:48:45 PM

---

Good afternoon,

My name is Levi Opsatnic and I fish for striped bass all up and down the Atlantic coast with Massachusetts taking a lot of my time. As someone who loves this state so much, it truly disappoints me to even see this being put to consideration.

It should come as no surprise that our Striped Bass are in trouble and their population is getting worse each year. Considering that the commercial quota is rarely met, it should be a great sign that these fish are overfished and their biomass is very delicate. Please, please, please do not give an early start to the commercial season, this will do nothing but further deplete a fragile resource. I think a lot of anglers are already upset with how the Striped Bass have been treated and this is just an extra blow. Having voiced my opinion on this, I'd love to see Massachusetts do the right thing and choose the ecosystem over the dollar, I'm sure I'm not alone in saying this either. So, once again, please do not begin the commercial season early and do not allow that to pass.

I sincerely thank you for reading this and hope that my comments help to show what is the right thing to do here,

Levi



**From:** [Joseph Mottola](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Feedback re: 322 CMR 6.07 & 322 CMR 6.18  
**Date:** Monday, February 17, 2020 9:33:35 AM

---

Dear Director McKiernan,  
I am OPPOSED to the changes proposed by recreational Striped Bass 322 CMR 6.07 and also opposed to recreational Bluefish 322 CMR 6.18.

I support keeping these regulations UNCHANGED.

Regards  
Joseph Mottola  
N. Andover MA

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Comments on 322 CMR 6.07  
**Date:** Thursday, February 27, 2020 2:21:05 PM

---

-----Original Message-----

From: James Harrison <jharrismed@gmail.com>  
Sent: Thursday, February 27, 2020 9:21 AM  
To: Fish, Marine (FWE) <marine.fish@mass.gov>  
Subject: Comments on 322 CMR 6.07

I am a recreational striped bass fisherman who travels to the east coast (Martha's Vineyard) to fish for striped bass. I live in Colorado.

With regard to the proposed changes regarding the harvest of striped bass:

1. All fisherman, not just recreational, should be required to use circle hooks when fishing with bait.
2. All fisherman, not just recreational, should be prohibited from removing fish from the water with a lethal device.
3. There should be no harvest of large striped bass at all, recreational or commercial. With the large declines in striper populations, the large breeding fish need to be left in the water.
4. The start of the commercial season, if there is one, should not be moved to June 1. That will expose even more large breeder female to harvesting.
5. The open days for commercial harvest should not be changed from Monday and Thursday to Monday and Wednesday. This change would increase the number of quasi-commercial part-timers harvesting fish.
6. Everything should be done to prevent and disrupt the illegal, sale of wild striped bass. Therefore, the DMF should require all commercially harvested striped bass to be tagged at the point of capture.

Thank you for considering my comments.

James Harrison  
Eagle, Colorado

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Commercial Striper fishery  
**Date:** Tuesday, March 10, 2020 2:00:26 PM

---

-----Original Message-----

From: louis catucci <catucci.louis@gmail.com>  
Sent: Tuesday, March 10, 2020 12:24 PM  
To: Fish, Marine (FWE) <marine.fish@mass.gov>  
Subject: Commercial Striper fishery

This is absolutely ridiculous!!!!

Mass hasn't made there quota in years an every year we're catching more shorts than ever before ! Opening this early for the 3500 commercial A-hats who average a tank of gas out of the Striper fishery is Moronic ! Your killing this fishery an have It has to stop ! Nh an Maine don't even get 30inch fish til end of June ..., enough is enough already Save the Striper fishery Sent from my iPhone

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: My opposition to the proposal of starting the commercial Striped Bass Commercial season early.  
**Date:** Friday, February 28, 2020 10:54:58 AM

---

**From:** Stephen Madden <stephenmadden@yahoo.com>  
**Sent:** Thursday, February 27, 2020 8:14 PM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Cc:** Tom Heath <capecodah@gmail.com>  
**Subject:** My opposition to the proposal of starting the commercial Striped Bass Commercial season early.

To: Acting Director Daniel McKiernan

My opposition to the proposal of **starting the commercial Striped Bass Commercial season early.**

The last two years the commercial fleet has failed to take their quota.

Instead of recognizing the problem as a canary in the fisheries coal mine, the consideration of opening the commercial fishery on June 1st 2020, three weeks earlier than usual is ridiculous!

There area a lot of large, breeding sized fish that pass through and around Cape Cod at this time of year heading north. Opening the season early not only hammers those fish, but it extends the focus on breeders for three weeks longer than usual.

Please keep in mind most of the folks fishing for striped bass commercially in our State of Massachusetts are NOT full-time commercial fishermen. They are "Recremercial" Anglers who buy into the fishery for a ridiculously low amount of money (\$160 last I checked) in order to exceed the recreational bag limit. Some of these "Recremercial Anglers" could also be the crooks (Poachers) who sell through the back door of way too many shops and restaurants.

My view on this as well as many, many, other true Recreational Anglers which I talk to, while I am legally Sportfishing and also conversing with, at many various Fishing Club meetings and gatherings.

IT'S A COLOSSAL MISTAKE ! !

Changes to the harvest to achieve an 18% reduction have already been implemented.

Any further action to increase pressure on the stocks is premature at best, destructive and foolhardy at worst.

Please listen to a Seasoned Recreational Angler who wants a Striped Bass fishery for our future ANGLERS !

Best,

Stephen Madden  
Recreational Angler  
7 Susan Circle  
Carver Ma. 02330  
Member  
MSBA, BBAC, SSFC

[Sent from Yahoo Mail on Android](#)

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Proposed Striped Bass Regulations  
**Date:** Thursday, February 27, 2020 2:25:11 PM

---

**From:** Justin Cordonnier <Justin.Cordonnier@BFIM.COM>  
**Sent:** Wednesday, February 26, 2020 12:56 PM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Subject:** Proposed Striped Bass Regulations

Acting Director McKiernan,

I have a few comments on the proposed changes to Striped Bass regulations.

1. Please apply the same rules regarding circle hooks and the “no gaff” rule to both recreational and commercial anglers.
2. Please do not move the start date of the commercial season forward (as early as June 1), as this will expose more large (breeders) bass to harvest.
3. An even better option would be to eliminate all harvest of stripers by both recreational and commercial anglers.
4. If the commercial fishery does continue, please require commercial fishermen to tag fish at the point of capture.

Thank you for your consideration.

Justin Cordonnier  
Needham, MA

 Please consider the environment before printing this email.

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Winter 2020 Marine Fisheries Public Comments  
**Date:** Friday, February 28, 2020 8:46:52 AM

---

*Shannon L. Davis*

*Revenue Coordinator*

**MA Division of Marine Fisheries**

251 Causeway Street, Ste. 400

Boston, MA 02114

617-626-1621

617-626-1509 FAX

[Shannon.davis@state.ma.us](mailto:Shannon.davis@state.ma.us)

---

**From:** Kurt Martin <timebandit100@hotmail.com>  
**Sent:** Thursday, February 27, 2020 12:55 PM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Subject:** Winter 2020 Marine Fisheries Public Comments

To Whom It May Concern:

I am writing to submit comments on MA DMF proposed Commercial Black Sea Bass 2020 quota.

I am in favor of moving towards a 2 day/ week, 450-500 pound catch limit, fishing Monday or Tuesday and Thursday. I do not want to fish on Sunday. Increasing the weekly catch to 1200 pounds per week could be detrimental to the price per pound. Spreading the catch over a longer season would provide a more consistent fishery to support local restaurants and fish markets. To compensate I suggest starting the season 1-2 weeks earlier.

I support increasing the seasonal weir fishery quota, it seems to be a fair percentage.

I also support the incidental catch limit for trawlers.

Sincerely,

Kurt Martin

**From:** [Tom](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Fwd: ACTION REQUEST- 2020 MA STRIPED BASS REGULATION PROPOSALS  
**Date:** Tuesday, February 25, 2020 8:24:39 AM

---

Acting Director Daniel McKiernan,

As a recreational anglers and resident of MA I completely support the views expressed below.

How long will you wait to recognize that we have a huge problem?

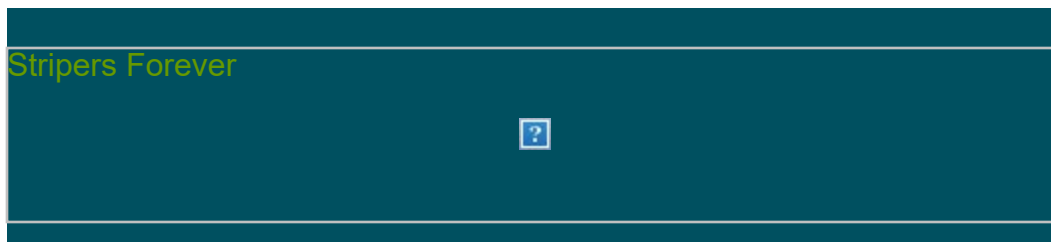
Act now.

Respectfully,  
-TW

-----  
Thomas Wisniewski  
917-885-2616

Begin forwarded message:

**From:** Stripers Forever <stripers@stripersforever.org>  
**Date:** February 25, 2020 at 8:03:16 AM EST  
**To:** Thomas Wisniewski <thomaswis@yahoo.com>  
**Subject:** ACTION REQUEST- 2020 MA STRIPED BASS REGULATION PROPOSALS



## **ACTION REQUEST**

# **2020 MA STRIPED BASS REGULATION PROPOSALS**



Image



## **Regulation changes are coming.**

The MA Division of Marine Fisheries (DMF) has scheduled public hearings and a public comment period to solicit feedback on proposed changes to commercial and recreational fishing limits to be implemented during the spring of 2020. Among many other items on the agendas these proposed regulations address:

- Striped bass recreational size limits, circle hook mandates, and the use of devices to remove striped bass from the water;
- Striped bass commercial seasons, fishing days, and size limits.

Please see DMF info below. Hopefully, you will be able to attend one of the meetings but if not, please send an email expressing your thoughts and suggestions. **Email address, mailing address and public hearing schedule are below, following our comments on the proposed changes.**

“Recreational Striped Bass (322 CMR 6.07). DMF is proposing several measures affecting the recreational harvest of striped bass. These measures are designed to conform state regulations to Addendum VI to the Atlantic States Marine Fisheries Commission’s (ASMFC) Striped Bass Fishery Management Plan (FMP) and reduce recreational discard mortality. The proposals are to: a. Adopt a slot limit of at least 28” to less than 35” total length for the recreational retention of striped bass. This slot limit will replace the current 28” minimum size. b. For 2021, expand the state’s existing circle hook rule to potentially require all anglers whether fishing from shore, a private vessel or a for-hire vessel to use circle hooks when fishing

with whole or cut natural baits and eliminate existing exemptions for certain terminal tackle configurations (e.g., tube and worm, snag and drop). c. Prohibit recreational anglers from removing striped bass from the water with any device other than a non-lethal device. Non-lethal devices will be defined as a device that does not pierce, puncture, or otherwise cause invasive damage to the fish that may result in mortality.” MA DMF

“Commercial Striped Bass (322 CMR 6.07). Beginning in 2020, the ASMFC has reduced the states’ coastal commercial quotas for striped bass by 18% to end overfishing. At our existing 34” minimum size limit, Massachusetts’ quota is expected to be approximately 713,000 pounds. To best utilize this quota, DMF is proposing several adjustments to the state’s commercial striped bass management regulations: a. Move the start of the commercial fishery from June 23 to as early as June 1. b. Adjust the open commercial fishing days from Mondays and Thursdays to Mondays and Wednesdays. c. Increase the minimum size from 34” to 35”. This will result in there being no overlap between lawfully sized commercial fish and lawfully sized recreational fish. If this change is adopted, DMF will also rescind: 1) the requirement that commercial anglers fishing recreationally for striped bass clip the right pectoral fin of any striped bass measuring at least 34” and 2) the allowance for dual commercial and for-hire permit holders to sell any commercially conforming striped bass caught by their clients. d. Maintain existing daily landing limits.” MA DMF

### **Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill  $\frac{3}{4}$  million pounds of these large breeders. It is simply wrong.” - B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will

increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.

5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

### **Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

Whether you are a MA resident or visit to fish for Striped Bass, thanks for reading and hopefully see you at one of the hearings (see schedule below) in addition to your sending an email expressing your concerns/input. Please put your personal thoughts into your own words and send an email to Acting Director McKiernan. Thank you!

## **ACT NOW!**

The DMF will accept written public comment on these proposals through **5 PM on Monday, March 16, 2020**. Please address all written comments to Acting Director Daniel McKiernan and submit to DMF by either email or post mail.

**Email:**

Acting Director Daniel McKiernan, [marine.fish@mass.gov](mailto:marine.fish@mass.gov)

**Post mail:**

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

**Public Hearing Schedule:**

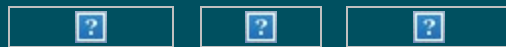
March 10, 2020  
6 PM  
Coolidge Middle School  
89 Birch Meadow Drive  
Reading, MA 01867

March 12, 2020  
9:30 AM  
Tisbury Town Hall  
Katharine Cornell Theater  
51 Spring Street  
Vineyard Haven, MA 02568

March 12, 2020  
6 PM  
MA Maritime Academy  
Admiral's Hall  
101 Academy Drive  
Buzzards Bay, MA 02532

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To contact [Stripers Forever](#) please email us at [stripers@stripersforever.org](mailto:stripers@stripersforever.org) or visit [stripersforever.org](http://stripersforever.org)



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Forever



Thanks,

Stripers Forever  
"Make it a Game Fish!"  
209 Winn Road  
Falmouth ME 04105  
USA

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**From:** [fishingsister@aol.com](mailto:fishingsister@aol.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [fishingsister@aol.com](mailto:fishingsister@aol.com)  
**Subject:** Fwd: Public Comment-Extending the Commercial Striped Bass Season  
**Date:** Monday, March 9, 2020 10:08:09 AM

---

Subject: Public Comment-Extending the Commercial Striped Bass Season

**It is a horrid idea and in the name of common sense I oppose it!**

**Imagine, "in the name of conservation" we are taking measures to kill less bass and of smaller fish size to protect breeders on the rec side while at the same time we are TRYING TO kill more breeders on the commercial side. How does that make sense?**

**Captain Jason Colby  
Little Sister Charters  
[fishingsister@aol.com](mailto:fishingsister@aol.com)  
617-755-3740  
[www.littlesister1.com](http://www.littlesister1.com)**

**From:** [Rick Rheinberger](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** MA Striped Bass proposed regulation changes  
**Date:** Tuesday, February 25, 2020 3:27:02 PM

---

Dear Director McKiernan;

I'm writing in support of the proposed changes to the recreational regulations. I have some issues with the commercial proposals. First and foremost, the regulations should mirror those proposed for recreational fisherman. Use of circle hooks and "no gaff" regulations only make sense for both groups. An earlier opening of the season also puts additional pressure on the large breeding females. After the success of rebuilding the stocks in the 80's it is crazy that we are back here. I have been a proponent of slot limits for decades. Regulations have allowed the targeting of the large breeders (most bass over 15lbs are female). It's time to protect the fish not the fisherman.

Respectfully;

Rick Rheinberger  
Sr. Vice President  
Affiliated Insurance Managers, Inc.  
935 Jefferson Blvd., Suite 2001  
Warwick, RI 02886  
(401) 352-3000 x222  
(401) 352-0020

EMAIL: [rick@aiminsco.com](mailto:rick@aiminsco.com)

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## MAC-ATAC Sportfishing

**Capt. R. Todd MacGregor**

Fishing Guide and USCG Licensed Master Captain

P. O. Box 68 Fairhaven, MA 02719 Office: 508/992-9189 Cell : 508/243-8559

[www.macatacsportfishing.com](http://www.macatacsportfishing.com)

[macatac.sportfishing@gmail.com](mailto:macatac.sportfishing@gmail.com)

To: Dir. Daniel McKiernan; Acting Director  
Massachusetts Division of Marine Fisheries

Date: March 10, 2020

Subject: Comments to the following proposed Draft Fisheries Regulations

---

Dear Director McKiernan:

I am writing this letter as a private citizen/fisherman and not as a member of or representing the views of any organization of which I may be a member.

I read through all of the ASMFC reports for each species. The referenced reports are attached. I find 2 glaring deficiencies with all of these ASMFC reports:

1. These reports are simply based on one specific species and do account for the overall Eco-System. Our ocean is full of many species which all interact with each other. Eco-System based management is mentioned in the Endangered Species Act, the Marine Mammal Protection Act and the Magnuson Fisheries Act. The ASFMC is a Federal Body and should be following Federal Laws.
2. There is not one mention of the largest problem depleting the forage fish and driving predatory fish offshore – **the huge population of Gray Seals**. Many of these animals are 500-700 pounds and we all know that they eat 8-10% of their body weight in various marine species per day. The Seals have destroyed our fisheries and fishermen more than any other contributing factor.

Here are my comments on the specific Mass DMF proposals:

1. **Striped Bass Conservation (322 CMR 6.07)**. DMF is proposing:

- a. Slot Limit:

I am against slot limits of any kind. As a charter fisherman, I am especially against NOT allowing us to retain trophy striped bass. This is the one major reason why people come from all over the world to fish in Massachusetts. In 2005, we had over 25 small boat charter-boats in New Bedford and Fairhaven. I am the last one left running a marginally viable operation. Not allowing the retention of Trophy Striped Bass will, in essence, kill my business and our way of life. We need some format, whether it be a certain number of *Trophy* tags or a



daily bag limit, to allow us to retain big fish. My customers need to be able to dream of catching a 30, 40 or 50-pound fish to get them to book charters.

b. Circle Hooks.

First off, the circle hooks should be *clarified* as straight and not offset circle hooks. I have had a number of gut and gill hooked stripers with offset hooks when we were testing circle hooks 15+ years ago. We also gill hooked 4 small Mako's last summer with straight circle hooks, Therefore, I am not convinced that straight circle hooks offer any type of solution. A tube lure, with a circle hook, will be rendered worthless because these are trolled baits. Circle hooks are designed for live or dead bait that is drifted and/or free spooled. We have to be able to continue to use straight J-hooks on tube lures as has been done since the mid 1960's. Most of us no longer use worms on Tubes as the price for a flat is so exorbitant. We have found other solutions to make Tubes be effective most of the time. Finally, this is an enforcement problem for the Environmental Police. How are the EPO's able to determine if a fisherman is intending to catch a striper, a bluefish or a sea bass? They all mix together. This proposed rule may have good intentions, but is simply not practical.

c. Gaffing.

I am 100% against prohibiting gaffing. Gaffing is the only safe way to handle a large Striper with a large, treble hooked plug across its mouth. The Gaff gives leverage on the fish. Using a net on a large fish, at night, in a heavy rip would endanger my clients and myself as I would lose total control of the fish when it comes over the gunnel. I also use a small, 2" gaff to release big fish by lip gaffing them and keeping them over the side of the boat while unhooking. After releasing tens of thousands of fish, I have found this to be the quickest and safest method. This is the best for the fish as it gets them back into the water quickly and does not allow the fish to flop around on the deck possibly causing injury to the fish. This is the method we used to handle the big fish when I conducted tagging operations with the DMF back in 2000, 2001 and 2002. I have never gaffed an undersized fish as these fish can be handled easily by just hoisting the fish over the side to be quickly released. Stupid fisherman, who Gaff small fish and then release them, fall into the category of 'Wonton Waste' which is already illegal. If gaffing is prohibited, many excellent fishermen, who have been using gaffs for their entire fishing careers, will now be criminals because they will be forced to use the gaff for safety reasons. Once again, this proposed rule may have good intentions but is simply not practical.

2. **Recreational Bluefish (322 CMR 6.18).** As a charter fisherman, 5 fish/day/person is acceptable. I do believe that it is inequitable to discriminate against private, recreational fisherman by only allowing them 3 fish per person. I have never considered myself to be more privileged because I have a Mass. Commercial Boat permit, a Charter-boat permit, or hold a Master's license. All fisherman should be treated equitably.

3. **Commercial Striped Bass (322 CMR 6.07).** June 1<sup>st</sup> is a Good start date. I like Mondays and Thursdays as it allows another day for the market to clear out

Monday's fish. Monday/Thursday ensures that fresher fish are being provided to the consumers. The DMF should consider a third day for Commercial Striper Fishing. We have to be allowed to sell fish caught on charters. It is tough enough to make it now, please do not put up another barrier to our success. Also, we need to be able to fish on holiday weeks. Eliminating commercial striped fishing on July 2<sup>nd</sup>, July 6<sup>th</sup> or Sept 7<sup>th</sup>, because the parking lots at launching ramps are too crowded, is ludicrous. It makes no sense to use a fisheries law to regulate parking. This also prevents Fresh Fish from entering the market during holiday periods with extremely high demand.

4. **Commercial Sea Bass (322 CMR 6.22)** Since Massachusetts will have a 60% increase in quota, I think the commercial season should start much earlier than July 12<sup>th</sup>. I support starting the Black Sea Bass Commercial rod-n-reel season in June 7<sup>th</sup> and keeping the daily trip limit at 150#. This will help achieve the maximum economic return for this resource over a longer period of time. There also has to be 3 open days per week to allow for one day of bad weather; I support continuing the Sunday/Tuesday/Thursday format. Rod-n-reel commercial fisherman should also have the same trip limits and fishing dates as fisherman using all other gear types enjoy. It has always been discriminatory to allow pot fishermen or dragnets to have larger trip limits. I have nothing against people who fish with other gear types. However, there should be equity.

It is time that the Commonwealth of Massachusetts Division of Marine Fisheries, and the Marine Fisheries Commission, work towards achieving the maximum economic benefit for the Commonwealth. It is also time to stop marginalizing small boat fishermen. Finally, it is time to take a stand, for all Massachusetts fisherman, and confront the **Gray Seal Issue**. We must confront the greatest issue negatively affecting our fisheries. Massachusetts must send a message to the Federal Gov't that we know the real problem and intend to address it.

Thank you for considering my comments.

Capt. R. Todd MacGregor  
Fairhaven, MA

**From:** [James Giles](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** New Regs  
**Date:** Tuesday, February 25, 2020 9:24:50 AM

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Is there no way to stop the killing of the cow stripers? 3/4 of a million lbs are you daff?  
Something has to change! I remember when we couldn't keep any! Let's bring that back for a few years and maybe we can replenish the stock.

[Sent from Yahoo Mail for iPhone](#)

**From:** [Sean Tracey](#)  
**To:** [Fish, Marine \(FWE\)](#); [Stripers Forever](#)  
**Subject:** New Regulations for Striped Bass Fishery  
**Date:** Tuesday, February 25, 2020 3:56:55 PM  
**Attachments:** [STA Logo Color.png](#)

---

Dear Acting Director Daniel McKiernan,

I am an avid striper fisherman (recreational only, mostly on fly rod, strictly catch-and-release) for 50+ years. I grew up on Bass River on the Cape in the 1960s and 70s when there were hardly any stripers, so I know how great it is that we now have a good fishery. I have seen it decline in the past 15 years, though, as I am now a NH resident and fish mostly from Portsmouth NH.

I visit the Cape where I have family, buy a licence, and pay charter captains from mid cape and P Town area to take my wife and I fly fishing every summer.

I am a member and support the efforts and the following opinions of the “Stripers Forever” action group:

### **Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

### **Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for

avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

I hope you and your commission will take the right decisions to protect these amazing fish from commercial harvest (I think any commercial use is unacceptable under the current mortality and conditions). We all do not want to see the extinction of stripers in our New England waters.

Thank you for your good efforts on our behalf.

Sincerely,  
Sean Tracey

Sean Tracey

email: [sean@seantracey.com](mailto:sean@seantracey.com)

p 603/427-2800

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401 State Street, Suite 3

Portsmouth, NH 03801



**From:** [Erik](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** New rule proposals  
**Date:** Tuesday, February 25, 2020 8:29:10 AM

---

Greetings

I'm writing to voice my approval of most recent new striper commercial and recreational rule proposals.

Erik Parillo

Sent from my iPhone

**From:** [F Kudarauskas](#)  
**To:** [McKiernan, Dan \(FWE\)](#)  
**Cc:** [Silva, Jared \(FWE\)](#)  
**Subject:** Proposed Striped Bass Management Changes  
**Date:** Wednesday, February 19, 2020 1:07:08 PM

---

Dear Mr. Daniel J. McKiernan, February 19, 2020

My thoughts regarding your memorandum dated 12/13/2019 about Proposed Adjustments to Commercial Striped Bass Limits:

- I have no issues moving the start of the striped bass fishery to June 1 but, it will not help to fill the commercial quota because of the proposed increase in the size limit from 34" to 35". A large portion of the previous year's quota consisted of bass in the 34" to 35" range.
- Adjusting the commercial open days from Mondays and Wednesdays is a minor issue but Mondays and Thursdays worked very well.
- Increasing the minimum size from 34" to 35" is a major issue. The majority of bass that are caught in the vicinity of Nantucket Sound, Monomoy Island and Chatham are less than 35". Many fishermen, especially those that fish at night use live bait in the form of eels. Attempting to catch a striper longer than 35" is going to gut hook and kill many of the bass the agencies are trying to protect. I realize that the enforcement and compliance regulations somehow dictated the new 35" size limit but doing so will not help the commercial fishermen nor the striper population. The New York market is a very important commercial outlet helping to stabilize daily prices when an abundance of fish are harvested. With a 36" New York maximum size, there will be many less fish to ship.
- With a significant decrease in the quota, 25% in past years plus an additional 17 to 18%, the daily trip limit should also be reduced to 10 or less fish. The fishermen's effort will diminish saving fuel and decrease the dead discards while the price will probably increase.
- Commercial size regulations should have a slot limit comparable to but not necessarily equal to the recreation fishery, i.e. 30" to 35". If you believe that reducing the commercial size limits will somehow tempt recreational fishermen to purchase a commercial permit to keep more fish by circumventing the regulations for themselves two days a week, then close the commercial fishery to new applicants. As an alternative, you could use the established control date on striped bass endorsements to limit the amount of outstanding permits. This slot limit will have a high probability of fulfilling the quota. It is a non-issue this year for one would have had to obtain a permit by the end of February.
- With a 35" minimum size limit, you are mandating the commercial fishermen to take only the larger more fecund breeders. That is certainly not good for the species and could increase the animosity towards commercial fishermen.
- With a slot limit, gaffing could be outlawed. Stripers can safely be netted.
- Mandate the use of circle hooks.

I have been a commercial fisherman for 30+ years and hopefully my comments will be considered and be able to ensure an abundant and sustainable important species.

Thank you for your considerations,  
Frank J. Kudarauskas  
P.O. Box 647  
East Dennis, MA 02641-0647

**From:** [David Nash](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Silva, Jared \(FWE\)](#)  
**Subject:** Proposed Striped Bass Management Changes  
**Date:** Monday, March 9, 2020 2:56:18 PM

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Attn. Acting Director Daniel McKiernan

Proposed draft regulatory amendments to 322 CMR §§6.00

These comments are filed in response to the public comment period regarding the proposed **Striped Bass Management Changes** for 2020.

As a recreational fisherman, I support the changes to protect Striped bass stocks. My hope is that monitoring of striped bass fish stocks continues to determine the effectiveness of these changes. It is obvious that states up and down the Atlantic coast are attempting to provide access to this resource to many different parties including recreational, for-hire and commercial. Many fishermen, including myself, would probably prefer a complete moratorium so as to allow for a more rapid recovery of striped bass stocks. I am concerned that the slot limit will only serve to move problems with breeding stock into the years ahead i.e. by creating gaps in the breeding population. Close monitoring by regulatory authorities of the impact of these changes may help to gain more knowledge of effectiveness.

With regard to the specific regulations, for recreational and all other users, fish mortality has finally been recognized as an issue. Requiring circle hooks and prohibiting gaffs will help but mortality is also increased by excessive measuring, photographing and handling in general, notwithstanding the need to measure to determine size. Holding up a bass for that photograph or to simply display it to on-lookers stresses fish and increases mortality. Catch and Release tournaments which do not specify immediate release encourage all of these potential abuses. I would suggest that DMF specify "immediate release" of all fish which are not going to be legally taken or which are mandated for release. "Immediate release" should be defined as immediate, without delay and which do not cause increased damage to the fish.

I would also suggest that a commercial slot limit be considered to further protect the larger of breeding age bass. While there might be a benefit to spreading out the allotted catch among bass of any size, perhaps the largest fish should also be left alone to further encourage recovery of the stocks.



Thank you

David Nash

PO Box 3254

35 Deacon Vincent Way

Edgartown, MA 02539

**From:** [C. J. Frankiewicz](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed Striped Bass regulations  
**Date:** Tuesday, February 25, 2020 8:18:11 AM

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Acting Director Daniel McKiernan, please take these comments to heart with regard to the proposed Striped Bass regulations.

### **Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

### **Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

Thank you,

C. J. Frankiewicz

*You May Say I'm a Dreamer But I'm Not the Only One.*

**From:** [Rick Hickox](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 MA Striped Bass Regulation Proposals  
**Date:** Sunday, March 1, 2020 9:04:29 AM

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Mr. McKiernan:

I'm writing to express my support for the positions taken by Stripers Forever regarding the proposed regulations to help preserve striped bass stocks. It is critical for all states to take significant steps to reverse the long decline in numbers and quality of these fish. Specifically, I support the following comments:

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, "I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong." -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial "part-timers" (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

Thank you for working to preserve this fishery.

Sincerely,  
Rick Hickox

**From:** [Randy Sigler](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Re: Comment on public hearing items  
**Date:** Monday, February 10, 2020 11:22:59 AM

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Sorry ... Typo correction ... in red below :)

R

On Feb 7, 2020, at 4:42 PM, Randy Sigler <[Randy@Striper.com](mailto:Randy@Striper.com)> wrote:

Dear Director McKiernan,

The following are thoughts regarding the upcoming public hearing items.

### **1. Recreational Striped Bass:**

**A. Slot Limit:** I fully and enthusiastically support a slot limit of 28" - 35". As a charter operator running over 800 trips a season for striped bass, this slot limit will dovetail very well with the conservation ethic we embrace, and make it mandatory that the large, breeding females be released. I do **not** foresee any negative consequence for our business due to adopting this new approach.

**B. Circle Hooks:** I fully support a circle hook requirement for all natural bait fishing for striped bass. Again, I see this complementing our conservation goals, and do not foresee any negative consequences by implementing this requirement for all sectors, including for-hire.

**C. Non lethal devices:** Yes ... fully agree with this proposal !!!

**2. Recreational Bluefish:** I fully support reducing the recreational Bluefish bag limit. Three fish per day is plenty for any recreational angler to harvest. I would also fully support adopting the three fish bag limit for for-hire anglers. Furthermore, I would support a vessel limit ... say 6 or 10 fish? In our North Shore waters, bluefish have been quite scarce the last few years. When they are present, it is generally very easy to put many fish in the boat. Bluefish does not store or freeze well, and we advise clients to take only what they can eat fresh (or smoke) that day ... and one or two fish is generally more than enough for them.

**3. Commercial Striped Bass:** In support of all proposed changes.

### **7. Commercial Menhaden:**

**B. Replacing 1,000 lb "incidental" limit:** I am uncomfortable with this replacement. I do understand the value of this fishery for the local lobster fleet, however, I believe this provision creates an unenforceable dilemma. Last year, after the 6,000lb limit was triggered, we continued to see "small scale" purse seiners netting menhaden in large quantities. The typical approach is that the vessel would make a set over a large school of Menhaden, and fill the net. They would then load the boat first (typically into a hold or into a partitioned portion of

the deck ... NOT into boxes), and then anchor with the net (still very full) tied alongside the boat. At this point, the lobster boats would come along the other side and take barrel after barrel of bait from the seiner. During lulls, the seiner would load more bait from the net onto the boat.

This creates several enforcement problems. One is that there is no way to measure the quantity of Menhaden that has been retained, or how much has been sold. Additionally, in the absence of enforcement present, the seiner can keep "live" bait alongside the boat replacing what they have sold in order to keep the "retained" portion within range.

I spoke with M.E.P. officers last year during the 6,000lb limit time, and they concurred that it was not something that they could/would check.

I would prefer that once the harvest has reached 100% of quote, that the "incidental" limit remain at 1,000 lbs.

**8. Sand Lance:** I fully support a limit on sand lance harvest. The sand lance represent an incredibly important forage fish for all of the valuable commercial species that we pursue recreationally and commercially. This type of forward thinking protection is exactly what needs to happen. Thank you for this!

As always, a big thanks to all DMF staff for their tireless dedication to protecting and managing the marine resources of the Commonwealth.

Sincerely,

Randy Sigler  
Sigler Guide Service  
1 Peabody Ln  
Marblehead, MA 01945  
[www.Striper.com](http://www.Striper.com)  
[randy@striper.com](mailto:randy@striper.com)  
617-459-1798

## Reed, Story (FWE)

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**From:** Jared Auerbach <jared@redsbest.com>  
**Sent:** Monday, March 9, 2020 2:43 PM  
**To:** Reed, Story (FWE)  
**Cc:** Rory O'Donnell  
**Subject:** Red's Best feedback

Hi Story, here are our thoughts (in general we support the longest possible season while still making sure we fill entire quotas)...

Black Bass -

Feel very strongly this should start earlier and go later. We are only for increases in weekly total landings in as much as it ensures the full harvest of the quota.

Striped Bass -

Fine with the proposed rule. Would like to double check that the math supports that we will still harvest full quota.

Fluke -

Fine with the proposed rule. Would like to double check that the math supports that we will still harvest full quota.

Thank you very much.

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**Jared Auerbach**  
Chief Executive Officer

Mobile: 1 617 413 4981 • Fax: 1 617 428 0030 • [jared@redsbest.com](mailto:jared@redsbest.com)  
WildFish LLC • 37 Boston Fish Pier, Boston MA 02210  
[www.redsbest.com](http://www.redsbest.com)



**From:** [MARY SOBEL](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** reply to opinion  
**Date:** Thursday, February 13, 2020 7:27:05 AM

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why cant we let the fish get bigger and reproduce i know we need to feed the masses but the sharks are shore lining because its easier to feed closer to shore i would say there is no fish at sea for the sharks to feed on the oceans are thinning out i know if we dont get them some one else will i know donnie on u tube following the trawler and 5 miles of dead scup and diferent fish the usa and other countrys need to down size i wonder how much is waste there rely is at 2000 lb i know nothing goes to waste fertilzer bait the last time i fished flounder middel ground they were small under the limit 14-16barely 2000 s i fished out there in the 80s on up into adult hood the avrage was 20 inches i havent heard of aney door mats latley eather +same with sword fish the avrage was 12-- 16 ft no more 16 foot sword fish so i think there should be a odd yr and a even yr to fish long line all hands one year then a net the next year the fish need a system to survive and reproduce and they wont thrive if we keep on them the way things are ive been hoping to hear the herring and the cod coming back i dont hear mutch about them

also when it comes to wet suits swiming surfing it seems to be a decoy for sharks i was told that sharks wont attac a diamond patern yes i think people should paint on or tattoo a diamond patern on there suit or legs s

thank you thats what i think

Carl A sobel west tisbury

**From:** [Gary M](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stop early Striped Bass harvesting  
**Date:** Tuesday, February 25, 2020 8:50:25 AM

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I do not support moving up the date to begin commercial harvesting of Striped Bass. Do not do it.

Gary Morrissette  
Londonderry, NH



James santapaola

25 Highland St Gloucester Massachusetts

3-4-20

My name is James Santapaola Sr, I am a commercial fisherman out of Gloucester Massachusetts. I have recently obtained a menhaden endorsement with my son. We now have a lot of money invested in the permit and for the menhaden endorsement, we also have a lot invested into the gear has well and time. When we purchased we were never notified at any time that there was a control date. This control date would be very unfair to us. The menhaden fisheries seems to be thriving better than it has in recent years, I don't see a need for a control date at this time.

A handwritten signature in cursive script that reads "James Santapaola Sr". The signature is written in black ink and is positioned centrally below the main body of text.


3-2-2020

Public comment to 2020 menhaden management proposal

Hello I'm am Andrew Santapaola I am a commercial fisherman out Gloucester Massachusetts. I recently just obtained a menhaden endorsement on a permit I have just purchased late fall of 2019 and plan on seining menhaden, I have a lot invested in the permit and gear now and would like to ask if we can move the may 2020 control date that the Massachusetts dmf has mentioned to a later date. The date of may 1 2020 doesn't give anyone much of a chance to land any menhaden for this date. If we could push it a couple months till July or august it will be a more fair chance to get landings for this date.

I am also suggesting that the dmf take action to extend the menhaden season so it will last into the fall buy making a smaller daily limit or a weekly cap or a seasonal sub quota, this will be more beneficial to the local lobster industry has well has not waste the product buy the vessels having to ship them all out of state or sending it off to be fertilizer.

Andrew santapaola captain f/v Gannet II

A handwritten signature in black ink, appearing to read 'Andrew Santapaola', with a long horizontal flourish extending to the right.

**From:** [captainwen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass , cod and Atlantic menhaden collapse ....by statisticians not biologists  
**Date:** Tuesday, February 25, 2020 10:01:41 AM

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Hello,

The quotas , that for decades have destroyed the menhaden population in the north east are also killing the striped bass population. Striped bass eat menhaden anytime the menhaden is available. The so-called mathematical model used to manage the menhaden is adjusted ad lib by the ASMFC and NMFS staff statisticians to maintain these outrageous quotas on this critical species of forage fish. The “ model” is modeling nothing. Remember ? ..... we had wonderful mathematical models for the cod stock before it disappeared. The same fishing industry scientist and retired NMFS managers drove that mess, they are now off to drive the menhaden mess. You should wake the hell up!

Get off the stripers and close that foreign owned menhaden reduction fishery before our kids have nothing to catch but the occasionally seen sea robin.

**From:** [Al Williams](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Daniel.Mckiernan@mass.gov](mailto:Daniel.Mckiernan@mass.gov); [Armstrong, Michael \(FWE\)](#)  
**Subject:** Striped Bass / proposed changes to commercial fishery.  
**Date:** Monday, February 17, 2020 4:21:41 PM

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Dear Acting Director Mckiernan

I am a long time participant in the Massachusetts striped bass fishery, both commercially and recreationally.

Please accept my comments specific to changes proposed for this commercial fishery.

1. I support whatever commercial quota reduction that is necessary to meet conservation targets.
2. I support the proposed commercial size increase to 35 inches.
3. I do not support an earlier opening to the commercial season.

The proposal to move the opening of the commercial season from June 23 to as early as June 1 gives unfair advantage to commercial participants in the southern half of our state.

In my opinion, early June has not given the major pulse of migrating striped bass sufficient opportunity to equally distribute throughout the state and up through the north shore.

In early June there are major aggregations of striped bass in Buzzards bay and south cape waters. This will give commercial participants in those areas early access to significant harvest

opportunities while fishermen from Boston north are still waiting for numbers of migrating stripers to arrive.

I favor keeping the current opening date at June 23, thus allowing equal opportunity for all commercial participants throughout the waters of the Commonwealth.

Thank you for consideration of my comments

Al Williams  
5 Orchard Way  
Gloucester, Mass. 01930

Email: [al.nightshift@gmail.com](mailto:al.nightshift@gmail.com).

**From:** [Shawn Tibbetts](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass comment  
**Date:** Saturday, February 8, 2020 6:19:26 AM

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Mr McKiernan

As a full time fisherman, I would urge you not to increase the commercial striped bass season. Stripers are in trouble, that is an indisputable fact. Stocks are low and show no signs of recovering soon. Anything that can be done to protect this resource and give it the time to recover should be considered. Please do not exacerbate the problem by increasing the pressure on an already taxed population.

Thank you for your time and consideration.

Sincerely,  
Capt. Shawn Tibbetts  
207-502-0368  
MaineTunaFishing.com

**From:** [Vetcraft Sportfishing](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** striped bass comments  
**Date:** Tuesday, February 25, 2020 1:52:45 PM

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I would like to submit the following comments.

We should promote regulations that are likely to be the most successful to replenish the striped bass stock. The mandatory circle hook requirement should apply to both recreational and commercial striped bass fishing to reduce discard mortality in both sectors. This regulation would produce no harm to either industry, as circle hooks (non offset) catch well and would reduce deep hooking quite a bit.

Secondly, I am not in favor of moving the starting time forward for the commercial sector. We need to make sure the fecund females have their greatest chance to spawn before potential harvest. The stock has little chance of rebuilding if the most valuable breeders are not protected during spawning season. I would also be in favor of postponing the recreational catch till after spawning activity is completed.

Dr Harvey Yenkinson

**From:** [Germain Cloutier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Commercial season  
**Date:** Saturday, February 15, 2020 12:40:07 PM

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Hello,

I strongly urge you to NOT open the commercial fishing season for striped bass Early this year. I know that the proposal is to open it June 1st rather than June 23rd. This would not be in the best interest for the declining striped bass numbers and the recreational anglers that contribute way more funds in the striped bass fishery than the commercial sector. I understand that the past few years Stripedbass harvest quotas for commercial catch haven't been met. Adding days on the back end of the season which has been done for the past years really has not yielded much of a catch to add to the desired quota. So in summary adding days to the start of the season would be detrimental to steipedbass in Massachusetts and to the surrounding states as well. Please DO NOT approve this proposal.

Thank you,  
Germain

[Sent from Yahoo Mail for iPhone](#)

**From:** [Kayak Fish New England](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass commercial season  
**Date:** Tuesday, February 25, 2020 10:42:53 AM

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Please reconsider the opening date of the season . Honestly I feel it should be shut down all together until the fish rebound . Thank you mike baker  
Sent from my iPhone



**From:** [john herrick](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass management  
**Date:** Thursday, February 13, 2020 8:11:35 AM

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Good morning,

I appreciate the efforts to protect the striped bass stock. I am a commercial permit holder. The only change I am confused with is the reason for the daily commercial fishing change. As striped bass is a seasonal specialty on local restaurant menus around the Massachusetts coastal communities, wouldn't we want the freshest fish available to our restaurants for the weekend? A Wednesday commercial sell day seems like we are moving further away from the fish consumption date on the weekend menu. Any other reason for this change?

Thank you,

John Herrick

**From:** [Riptide Charters](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Proposals  
**Date:** Friday, February 7, 2020 3:40:01 PM  
**Importance:** High

---

Dear Acting Director Daniel McKiernan,  
Regarding the 2020 Public hearing notice,

I support all of the current striped bass proposals for the recreational sector.

Regarding the Commercial striped bass sector,

I support the 35" minimum size to eliminate overlap with the recreational sector.

I DO NOT support the changing of the start date of the Commercial season to any date earlier than June 23rd. There is already chaos at the local boat ramps and on the fishing grounds during the commercial season. Opening up an additional 3 weeks would only serve to further disrupt the fishery for the vast majority of the recreational and charter anglers.

I support the bluefish proposals.

For Commercial Sea bass I support the following proposal a. Adjust fishing limits for the summertime directed fishery. DMF's preference is to maintain the existing season and Sunday/Tuesday/Thursday open fishing day schedule, but increase directed fishery trip limits from 300 pounds to 400 pounds for pot fishermen and 150 pounds to 200 pounds for hook and line fishermen.

Respectfully

Thanks,

Capt. Terry Nugent  
Riptide Charters  
[www.riptidecharters.com](http://www.riptidecharters.com)

**From:** [Mark Remlinger](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regulations for 2020  
**Date:** Saturday, February 8, 2020 5:00:18 PM

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To: Acting Director Daniel McKiernan,

I would suggest moving striped bass in 2020 to a recreational sport fishing status only, release only. No keeping of or possessing by any angler commercial or recreational.

Mark Remlinger

**From:** [trout21](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Tuesday, February 25, 2020 11:37:12 AM

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I support the comments submitted by Stripers Forever

Gaffing should be eliminated. A gaffed bass is a dead bass. The decision to eliminate the gaff for recreational fishermen is a good idea. I do not understand the logic of exempting commercial fishermen.

I strongly oppose moving the starting date for commercial season up to June 1. The fact that there is a problem achieving the quota should be an alarm going off. If the striped bass mass is so depleted that the commercial fishermen cannot achieve the quota under the historical beginning date, should confirm the need to harvest less fish. Similarly changing the days of the week for commercial fishing should not be changed.

Circle hooks should be required for all forms of bait fishing.

Most importantly, I do not see the logic of allowing the commercial fishermen to delay tagging their caught fish to point of sale. This only serves to allow the bad apples to exploit this policy.

Sent from [Mail](#) for Windows 10

**From:** [cod40ken@aol.com](mailto:cod40ken@aol.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass regulations  
**Date:** Sunday, February 9, 2020 12:09:23 PM

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I have read the proposed (2020) alterations to Striped Bass fishery regulations up for discussion.

I can see from your proposals some good intentions for the management of the striped bass fishery.

Whilst the introduction of the slot size limit is good step forward, the protection and consistency of the long term future for striped bass lies with understanding what is the key part of the Striper population.

Your fishery management scientific team can confirm which range of fish form the core breeding stock which needs protection, This should be used to determine the optimum take-able catch size of fish, both commercial and recreational. Tinkering with size limits and season dates need to be considered against breeding patterns and species maturity.

I have difficulty in understanding the logic regarding "Commercial licences". There is some integrity in the allowance of a commercial licence for those whose livelihood is dependent upon fishing and that would include those full time boat operators who cater for recreational anglers.

The abusive situation that is the issue of a "commercial licence" to anyone paying the token price serves no purpose. A commercial licence can be used to funnel recreationally caught fish so that an individual generally meets their individual allowance. The fish taken will generally be mature females.

Whilst the prediction by fisheries management as to the Quota for each year is one which should be sustainable, it is a guesstimate based on a number of factors. Is there a published paper which identifies catch rates and how the quota is arrived at? Income from the catch will remain steady when a quota is reduced, as market value will fluctuate to reflect available landed fish.

Regards Ken Robinson

***As a regular visitor to MA I have been communicating with angling interests in the State regarding concerns about the striped bass population. (please see below my response to an Cape editor from last year)***

*How do we support and improve the Striped bass fishery on the Cape.*

*After spending six weeks on the Cape and having spoken with a number of the finest local anglers, particularly on the Canal There appears to be a general consensus that this has been one of the poorest years for quality fish since the striper recovery.*

*There appears to be a healthy stock of juvenile fish this year and plenty of fish around the legal size limit.*

*The Striper is obviously a major revenue fish for the State of Massachusetts and other States. Having experienced the best the Cape can offer and also witnessed the abuses that accompany those periods of big fish runs, one questions the logic of how the fishery is currently managed.*

*Anglers openly take more than one fish per day, often secreting fish in their vehicle or the bushes and then returning to take further fish. Undersize fish are also taken. Some anglers will report these events, but they are in the minority. The indigenous population seem to have the ability to take fish without consideration of numbers or size.*

*Worst of all is the so called "commercial licence which encourages anglers to go out and take the largest fish to the limit of their legal catch number. Anglers will ditch a moderate fish for a much larger fish when their limit has already been achieved.*

*The increase and extension of the commercial harvest because the Commercial quota has not been achieved seems short sighted. Is it possible that the reason for under achievement was caused by a flawed analysis of projected fish stocks. Superficially the trend appears to indicate a decline, 2017 a bumper year, 2018 a good year 2019 less than average year.*

*When you consider that most of the big fish are actually females and therefore the brood stock, it is easy to see the potential for disaster if controls are not exercised. Whilst there a limited number of fishery protection officers a more targeted approach may give better control, than generally just relying upon a presence.*

*There are probably a number of sensible options for future management. Here are a few suggestions for consideration.*

- *Maybe the introduction of a slot size would help sustain the fishery.*
- *Remove commercial licences. Marginally increase the standard licence rate to balance the states revenue for the loss of the commercial licences.*
- *Make Cape cod canal a catch and return venue.*
- *Increase the penalties for intentional illegal actions.*

**From:** [Robert Woods](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Friday, February 7, 2020 4:34:29 PM

---

Good day

I hope you consider something for anglers who catch a trophy bass. Maybe a slot limit that would allow you to keep a bass over 50 inches. At that size they have lived a full life and reproduce plenty of times.

Thank You  
Robert Woods

Sent from my iPhone

**From:** [ejmerchant@charter.net](mailto:ejmerchant@charter.net)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Tuesday, February 25, 2020 12:36:43 PM

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Please do the right for the sake of future generations. I agree with Stripers Forever, even though I rarely get to fish for strippers. But, I sure do want my grandson to have that opportunity. Thanks.

*Sent from my Verizon LG Smartphone*



**From:** [Dean Clark](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass  
**Date:** Tuesday, February 25, 2020 11:36:15 AM

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Director McKiernan,

According to scientists at the ASMFC, **the mandated 18% reduction in the harvest of stripers only has a 50% chance of being successful** in the recovery of this currently overfished stock. This also means that it has a 50% chance of failing.

Given these sketchy odds why are we intentionally making it easier to kill off even more off these fish? **Massachusetts is purposefully targeting nearly 3/4 million pounds of breeding female striped bass for harvesting!** How can rational thinking folks endorse such irrational decision making?

**It is time to institute regulatory changes designed to put the welfare of the fish ahead of the short-sided demands of commercial harvesting interests.**

A good and reasonable start would be to:

- 1) **Have the circle hooks and no gaff rules apply to everyone** - commercial and recreational.
- 2) **Do not allow for any earlier opening of the commercial season** as it will further deplete the already overfished stock of large breeder female bass that are transiting through our coastal waters.
- 3) **Do not change commercial open days to Monday and Wed.** as it will further encourage quasi-commercial (recomercials) and out of state anglers to take advantage of our liberal commercial striper licensing/harvesting regulations and make it more difficult for legitimate commercial fishermen to catch their daily limit.

Additional comments: **require that commercially harvested fish be tagged at point of capture** not point off sale which everyone knows is allowing for a substantial black market in untagged and therefore unreported female breeders.

Thank You,  
Dean Clark  
596 Franklin St  
Duxbury, MA  
508 769-9765

**From:** [Bradford Burns](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** striped bass  
**Date:** Tuesday, February 25, 2020 8:38:14 AM

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Acting Director Daniel McKiernan

I believe that continuing the commercial fishery for large striped bass is completely wrong. This fishery should have ended a long time ago, and it certainly should end now. The last thing that anyone should consider is any measure that will increase the mortality on large striped bass. No earlier fishing dates that will just keep more part timers in the game, no exemption for circle hooks or the use of gaffs in the commercial fishery should be allowed.

Brad Burns  
18 Merrill Rd.  
Falmouth, ME 04105

In reference to the proposed commercial fishery ban for striped bass (as reported by the Cape Cod Times on Sunday 01/14/2018) I submit the following catch report information as relevant to the debate as to who are the primary beneficiaries and whether striped bass should be taken “off the menu”:

Pursuant to my Freedom of Information request to the Massachusetts Division of Marine Fisheries (DMF) in January 2018, I was furnished with database statistics for “MA Striped Bass Fishery Permit Activity and Landings, 2016-2017” (Table 1)

(Table 1)	<u>Year</u>	<u>Active Permit Holders</u>	<u>Total Lbs</u>	<u>Lbs by top 10%</u>	<u>% of Total</u>
	<u>2016</u>	1339	997,894	373,357	37.41
	<u>2017</u>	1389	825,880	337,339	40.85

As demonstrated by (Table 1), the top 10% of all commercial bass permit holders (or about 134 fishermen) caught over 37% in 2016 while in 2017 the top 10% (or about 140 fishermen) caught over 40% of total catch in pounds.

DMF furnished additional statistics for both years indicating the total catch by all permit holders in 10% increments as shown in Table 2 and Table 3.

(Table 2)	<u>Year</u>	<u>% of Permit Holders</u>	<u>% of Total Catch</u>
	<u>2016</u>	1-10%	37.41%
		11-20%	20.42%
		21-30%	13.41%

(Table 3)	<u>2017</u>	<u>% of Permit Holders</u>	<u>% of Total Catch</u>
		1-10%	40.85 %
		11-20%	20.12%
		21-30%	12.54%

As demonstrated by (Tables 2&3), the top 30% of permit holders (or about 401 fishermen) caught over 71% of the total catch in 2016 and in 2017 the top 30% (or about 416 fishermen) caught over 73% of the total catch.

DMF also supplied other requested data concerning the percent of commercial sized fish (34 inches and above) that are female. Using a commercial sampling known as “Syke Method”, since 2004 the percent of female fish equal to or greater than 34 inches averaged at close to 98%. Perhaps a better determination of sex was accomplished by DMF by dissecting each fish although it was a much smaller sample size. Using this method for fish sized 34-40 inches the percent female was still nearly 89%. Both studies reinforce a common understanding that most big striped bass are females, each containing a million or more eggs. A 12 lb female carries an estimated 850,000 eggs while a 55 lb female can have as many as 4,200,000 eggs. These big fish are being eliminated from the breeding population by commercial fishing by a million pounds annually in Massachusetts alone.

Although additional information on fish mortality was requested, DMF was unable to comply because no data on the number of sub legal striped bass released by commercial fishing is reported. One estimate from 2009 put the number of released fish at 69,060 compared to a harvest of 59,666, but that estimated could be biased. It is logical to assume that the number of sub legal sized commercial fish (<34") hooked and released is at least equal to, or greater than, the number of harvested fish. The release mortality rate is difficult to calculate. A commonly accepted figure is 9%. One study in the Hudson River established a release mortality rate of 14% (including 5% for circle hooks and 16% for J hooks). Some charter boat fishermen believe the number is closer to 30%. But whatever the mortality rate, it is not included in the annual fish harvest reports.

Further contributing to mortality rates are the illegal practices of "high grading" and "stockpiling" of striped bass by some fishermen. High Grading is the practice of releasing dead striped bass in favor of subsequently caught larger striped bass (there are quotas on the # of striped bass you can catch per commercial day). Stockpiling is the practice of catching striped bass on days not allowed by fishing regulators for sale on subsequent allowable days, or for sale out of state. To be clear this is not an indictment of the entire commercial fishing industry because I believe most play by the rules. But it does happen often enough to contribute to a skew in harvest reports. And recreational fishermen are not immune to some of the same unethical and illegal practices, as well as poaching, if we can depend on reports from the Cape Cod Canal region last summer.

I am not trying to pick a fight with commercial bass fishermen. " Science "apparently is on their side and the fishery is being regulated. Since transparency is the buzzword these days I, too, have a commercial rod and reel permit with an endorsement for striped bass and I have enjoyed commercially fishing for striped bass in the past. But, I now support the movement for making striped bass a recreational fish. Commercial bass fishing benefits relatively few permit holders while recreational fishing is more valuable to the economy, and more equitable to the majority, and more sustainable to the fishery. There are perhaps thousands of recreational fishermen in MA competing during a very short season, for one of the few real gamefish we have in New England saltwater. Unlike Florida, which has dozens of gamefish species, Massachusetts has few like bluefish and a fall run of false albacore and bonito, but striped bass is still the prize.

And I question the science that tells us that bass stocks are not in danger. Just about every species fishing regulators have tried to manage during my lifetime has crashed including cod, flounder, haddock, weakfish, and yes striped bass. Fish are cyclical and spawning success is a variable difficult to manage and control. For example, there were very low numbers of striped bass at the end of the 19th Century which could not have been because of overfishing. We experienced another crash during the 1980s when anglers went entire seasons without catching a striper. To further illustrate the vagaries of spawning stock there are now serious concerns about the serious decline of the bluefish population along the East Coast over the past 10 years. So altogether it makes me doubt the wisdom and sustainability of intentionally removing so

many bass collectively carrying trillions of eggs from spawning again for sake of the privilege of paying \$15-20 a pound for fresh striped bass for two months every summer.

Finally, I also challenge the way recreational striped bass fishing is managed in Massachusetts. While I can appreciate the rationale of the 28" minimum size for spawning purposes the corollary is that fishermen may catch and release a hundred or more smaller fish before landing a "keeper". With the aforementioned mortality rates this type of fishing in mind this regulation does not make sense for sustainability. I would submit that a one fish 18" minimum would satisfy the requirements of most recreational fishermen.

David L Clark  
Waquoit, MA  
508-495-903





**From:** [Amberson, Jeff \(US\)](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Regulations - proposed changes  
**Date:** Friday, February 7, 2020 4:23:27 PM

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Mr McKiernan

As a lifelong resident of the Commonwealth and avid sportsman, I would urge you not to increase the commercial striped bass season. Stripers are in trouble, that is an indisputable fact. Stocks are low and show no signs of recovering soon. Anything that can be done to protect this resource and give it the time to recover should be considered. Please do not exacerbate the problem by increasing the pressure on an already taxed population.

Thank you for your time and consideration.

Jeff Amberson  
Northborough, MA

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**From:** [Steve Lempitski](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Regulations  
**Date:** Sunday, February 16, 2020 11:38:11 AM

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How about imposing a season? I see many fishermen throwing lures with double trebles at 15 inch school bass in coastal rivers starting in March and through April. This should be illegal, with only open ocean fishing allowed until May 1st.

Steve Lempitski  
508-566-4735

**From:** [Peter A. Viau](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stripers  
**Date:** Tuesday, February 25, 2020 3:18:38 PM

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Please close the Striper harvest to recreational and commercial harvest until the species covers from the depressed stocks.

Make the Striper a recreational game fish with no commercial harvest. It will pay significant dividend to the recreational, tourism, boating, and tackle industries. Regards Peter A Viau

**From:** [Garrett Hauck](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stripped Bass Management  
**Date:** Monday, February 17, 2020 1:08:14 PM

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Hello Marine fisheries Management Team.

I am excited to see that a size bracket is being discussed for the stripped bass. I remember as a child the limit being 32" and the following years seeing a lot more fish of smaller size. In recent years I have noticed a decline in large fish. I do not keep a lot of bass, maybe one every couple weeks around 30". There were days this summer where we caught a few(2-3) 20-30lb fish. The summer before there were trips where we caught over a dozen fish close to 40"

The year of 2017 I could catch all the 40" bass I wanted consistently. 2019 was not a good bass year, I really had to work hard for them.

I cant blame this on the commercial bass fishery , but it does not help the problem. This industry / regulations promote targeting female spawning stripped bass. A bracket for stripped bass is essential for the survival of this species ( for commercial aswell )!!

I fish circle hooks exclusively and have great success , Why is it mandated that Rec. bass fishermen use Circle hooks yet commercial fishermen do not ? IT should be fair across the board!

set brackets for commercial and Rec. Make everyone use circle hooks !!

All of the commercial bass fishermen I have met "work the system" fishing off days .. keeping bass on ice , and even some boast about " grading fish" it makes me want to puke. I watched the striped bass fishery collapse on Marthas Vineyard. This was due to several locals fishing nonstop for stripped bass. Keeping these areas chummed consistently and fishing all night till the am then doing it again. Selling fish to restaurants, markets anyone they could.

Please help

Thank You,

Garrett Hauck  
617-869-7742

**From:** [casey webb](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Supporting Stripers Forever comments on 2020 striped bass regulations update  
**Date:** Saturday, February 29, 2020 4:31:41 PM

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Director McKiernan,

I'm writing to express my support for the comments given by the Stripers Forever group on the proposed 2020 updates to Massachusetts striped bass fishing regulations. Overall, I really appreciate your commitment to bringing down the mortality for this year but agree we could go further with simple steps like mandating use of circle hooks and no gaffs for all anglers as opposed to just recreational.

Thank you for taking the time to read my comments.  
Regards,  
Casey Webb

**From:** [ALAN GONSALVES](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** To: Acting Director Daniel McKiernan  
**Date:** Saturday, February 8, 2020 10:24:33 AM  
**Attachments:** [image.png](#)

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Dear Mr. McKiernan,

I would like to comment on the proposed recreational changes for striped bass and bluefish. My views are in line with most of the fishermen I know who, like me, fish 50-150 days each season. Almost all I have spoken with would support a catch-and-release fishery, but we understand that is highly unlikely. Instead, we would happily support any regulation that reduces mortality, including the current proposals. Concerning the current proposals, the ASFMC indicated that the intent was to protect the declining number of large breeders, which made sense until they suggested the larger size commercial range. Their argument lost all credibility.

In addition to the circle hook requirements, I would like to see a ban on treble hooks as well. I and others replace these lure hooks with singles and while we may miss a few, the release is safer for the fish.

I've included my log summary for my saltwater trips, mostly in the Plum Island area but includes the Rumney Marsh, Boston Harbor and Mystic River as well. It clearly shows the recent decline in large stripers. The trips include boat and shore fishing.

As for the bluefish, my log summary shows what we have been seeing in the Plum Island area for the past seven seasons. The Chesapeake Bay juvenile index data published by the Maryland DNR indicates a long decline. I would gladly give up keeping these fish until they rebound.

Given the added pressure on fisheries from warming seas, acidification and pollution, I believe we need strict regulations to preserve them.

Alan Gonsalves  
Melrose, MA

	SW Trips	Hours	Schoolies	Keeper Bass	Bluefish
1996	57	270	487	4	21
1997	57	207	459	-	21
1998	54	169	705	5	36
1999	57	163	595	-	17
2000	69	232	901	4	20
2001	62	197	778	12	16
2002	76	225	910	28	117
2003	71	162	412	30	65
2004	91	245	776	26	73
2005	94	206	899	22	76
2006	111	267	1,764	4	97
2007	110	277	1,756	36	185
2008	128	358	1,501	79	253
2009	100	259	757	52	200
2010	117	285	526	137	184
2011	86	197	316	159	84
2012	128	267	821	49	220
2013	125	214	731	90	5
2014	110	209	1,058	10	2
2015	67	111	239	8	3
2016	83	178	1,604	9	2
2017	118	223	2,310	15	-
2018	86	115	282	4	1
2019	100	149	524	7	1

**From:** [Jeff Giacomelli](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Winter 2020 Marine Fisheries Public Hearing Notice  
**Date:** Friday, February 7, 2020 3:40:51 PM

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Mr. McKiernan:

I read the proposed fisheries changes and writing as a recreational angler I favor the proposals outlined.

I believe limiting fish mortality and catch limits is important to preserving the fishery.

Thanks,

Jeff Giacomelli  
47 Thayer Rd.  
Mendon, Ma 01757

**From:** [ride603@gmail.com](mailto:ride603@gmail.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Tuesday, March 10, 2020 8:14:05 PM

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To whom it may concern,

I am sending this email in regards to the proposed changes to the the commercial striped bass fishery. The need to increase the season for commercial anglers based on their inability to fill the quote is extraordinarily short sighted. The fishery is in need of conservation. I applaud your efforts to institute the use of circle hooks and do away with gaff use in the recreational sector. These fish draw me to your state where I regularly use my disposable income to vacation while fishing. The striped bass generates more revenue for the commonwealth via the recreational sector than the commercial. The fact that out of stater's can hold a Massachusetts commercial striped bass permit only fosters poaching in waters in my home state of New Hampshire where a fish can be taken and driven over the boarder and sold. Their are so few people that are earning there sole income off of this commercial fishery that is it worth the cost of regulation and enforcement that is put into it? I would not be against a select group of professional commercial fisherman harvesting within the quota. To allow out of state anglers who use the state of Massachusetts resource to justify to there wife the need for a bigger boat or new fishing reel to use and I'm sure abuse this resource taking valuable time and effort away from Mass EPO's seems like it is counter productive to commonwealth.

Thanks for taking a moment to read my rant and please reconsider extending the commercial striped bass season,

Dj Lovett  
Concerned angler

Sent from my iPhone



**From:** [Frederick Bogue](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass commercial  
**Date:** Tuesday, March 10, 2020 7:55:04 PM

---

I think the striped bass biomass is in trouble. This can be easily shown by the fact the mass. Commercial catch hasn't reached their quota lately. Extending their season goes against the principal of reducing harvest to protect the species

Sent from my iPhone

**From:** [Luis Tirado](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Commercial Season 2020  
**Date:** Tuesday, March 10, 2020 7:42:33 PM

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I would like to express my concern regarding the state of Massachusetts' proposal to start the 2020 Striped Bass Commercial fishing season on June 1, 2020 instead of the traditional start of June 23rd.

It is no secret that the Striped Bass stocks are in trouble, and that the commercial fishermen participating in the Striped Bass fishery have not been able to reach the predetermined quota for the past few years. Their inability to meet the quota should be evidence enough that the most conservative measures should be taken in order to regrow and bring the stock back to healthy numbers.

By adding additional days to the season you will only be putting a larger unneeded target on the very size class of fish that we are depending on to rebuild the fishery.

I am charter captain and I am strongly opposed to the motion to extend the Striped Bass Commercial Fishing season.

Captain Luis Tirado  
Owner  
Diamond Pass Outfitters  
207-899-5985

**From:** [Dave McCarthy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass commercial season change  
**Date:** Wednesday, March 11, 2020 6:27:33 AM

---

Dear Sirs,

I am writing to let you know that I oppose allowing the commercial fishery too be opened earlier than current law allows. There are too many large fish still waiting to spawn at that early time that will be caught. Catching these egg laden fish will devastate the fishery for generations to come.

I would also ask that you please recognize the dollar value of the recreational fishery for stripers. There are thousands upon thousands of recreational fishers who spends millions and millions of dollars locally. These monies come from residents and nonresidents alike who fish for recreation.

Sincerely  
Dave McCarthy  
Sebago, ME

Sent from [Mail](#) for Windows 10

**From:** [Curt Jessup](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass commercial season  
**Date:** Tuesday, March 10, 2020 7:48:12 PM

---

We should not open commercial striped bass early. Striped bass are in critical decline and commercial season should be limited further or better yet eliminated all together!

Much thanks,

Captain Curt Jessup

Sent from my iPhone

Capt. Curt Jessup  
Broker  
Boston Yacht Sales  
145 Falmouth Heights Rd  
Falmouth MA 02540  
[capecodoutfitters@comcast.net](mailto:capecodoutfitters@comcast.net)  
508-400-5627

**From:** [M.B](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass commercial season  
**Date:** Tuesday, March 10, 2020 7:55:21 PM

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To whom it may concern,

I am writing you to let you know that opening your commercial season for striped bass in Massachusetts early as you have proposed to do will only hurt the fishing further north of you. These fish are migratory and they don't stop at the Massachusetts New Hampshire border as you know so if you guys open your season early during the peak of the migration north you are going to allow your commercial fisherman to kill all of the breeders and give them zero chance and only hurt the fisheries more. If you were up to me I would shut your commercial season down 100% for the next five years and then when you re-opened it you could see the most amazing striped bass fishery you have seen in your lifetime. It's only common sense. Mike Baker  
Sent from my iPhone

**From:** [Aaron Broaddus](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Fishery  
**Date:** Tuesday, March 10, 2020 9:31:09 PM

---

Hi there!

I'm emailing you to voice my concerns about the current state of the striped bass fishery, not just in Maine where I live, but everywhere. It's the year 2020 and we understand the effects of over harvesting any type of fish. I don't understand if the catch rates are going down, why we're extending the harvest season. It seems counterintuitive and feels like there's some back door, wrong deal going on. If anything we should be making the harvest season shorter and limiting it to one fish over 48", past the size of most breeder fish. It's hard enough to enforce laws on the open ocean, and people are being unethical. Poaching is a serious, serious problem and also doesn't seem to be factored into this equation.

Please, for the love of GOD, do not extend this season, and consider going the other direction so that we can have a sustainable fishery for everyone to enjoy for decades to come. At this point, we'll be lucky to be able to even fish for schoolie sized stripers in 10 years. Figure this out, please.

Sincerely,

Aaron Broaddus  
[headinnorthguideservice@gmail.com](mailto:headinnorthguideservice@gmail.com)  
[www.maine-fly-fishing-guides.com](http://www.maine-fly-fishing-guides.com)  
207-838-8099

**From:** [Benjamin Burns](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass proposed change  
**Date:** Wednesday, March 11, 2020 7:41:13 AM

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To whom it may concern,

I have recently been made aware of the proposed change in MA to move the commercial fishing dates from a June 23rd start to a June 1st start date. We know the the Striped Bass fishery is in trouble. Why is this even being thought about? I may fish in MA once or twice a year but that is not why I am writing. I fish 3-4 times a week in Maine and this rule change will be detrimental to our fishery. We have just started to see the fishery come back to life in Maine and this will kill it again. All of the “keeper” size fish that come to Maine in the summer too forage will be getting killed on the way and will never give Maine anglers the chance to enjoy them. I urge the powers to be in MA to strongly consider NOT making this change and to try and enforce the most conservative conservation tactics possible to ensure that generations of anglers in all states can enjoy this wonderful fishery.

I appreciate your time.

Ben Burns

**From:** [Joe Lane](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass  
**Date:** Tuesday, March 10, 2020 9:32:04 PM

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I'm writing in hopes that you increase your conservation efforts on the striped bass instead of opening the season early to the commercial season. Years ago I traveled from VT to Cape Cod 8-12 weekends per year to fish for stripers. I usually hired a guide 3-5 days, rented a home for several weeks, or stayed in hotels, ate at restaurants, visited various shops, etc. I would even bring my entire family for a weekend or two. All totaled I would spend thousands of dollars on Cape Cod each spring and fall to catch and release striped bass. These days I don't go down at all. I didn't spend a single weekend last 2 years on cape cod or in the state of Mass for that matter. Why? Because the striped bass fishing is a shadow of what it used to be. These fish are in trouble and I see no reason to cast to empty waters. I still spend thousands chasing fish, I just do it somewhere else. I hope you consider the economic loss to the state the catch and release striped bass fishery contributed to the state. Many of my fly fishing friends are in the same boat as I am. Additionally, Mass regulations hurt the fishery for other states as well being a migratory species. Please end your commercial fishery for striped bass and let the species recover.

Thanks for you consideration.

Joe Lane  
Williston Vermont.

Sent from my iPhone



**From:** [Myles Culley](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper commercial fishing season  
**Date:** Tuesday, March 10, 2020 7:17:59 PM

---

Please do not make the commercial season for Striped Bass earlier! We are all aware that the population is on the decline and we should be taking measures to reduce commercial fishing rather than increase it. Let's keep the population going strong for future generations!

Sincerely,  
High School Sophomore  
Myles

Sent from my iPhone

**From:** [Bill Dawson](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Season  
**Date:** Wednesday, March 11, 2020 6:48:58 AM

---

As a professional in the fly fishing industry whose business depends on and more importantly thrives on a robust Striper population that migrates up and down the east coast, I am concerned about the state of the striped bass fishery and believe a more conservative management approach is called for not less.

Best Regards,  
Bill Dawson  
WDawsons, Inc.

**From:** [Russell Therrien](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Saltwater fishing license  
**Date:** Thursday, March 12, 2020 6:19:29 PM

---

My wife and I applied for our saltwater fishing licenses online the same day. Hers showed up online and mine didn't.

Russell Therrien  
10 Paul St  
Auburn MA 01501

Sent from my iPad

**From:** [Tom](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Save the Stripers!!!!  
**Date:** Thursday, March 12, 2020 5:31:00 PM

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Acting Director Daniel McKiernan,

I would like to add my voice to my fellow recreational fisherman. I fish with my son out of a 16 ft Whaler in the Vineyard sound and am a long time resident of Massachusetts.

You need to give more consideration the 1,000's of individuals and families that enjoy recreational fishing. Enact fair regulations:

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [*J hooks kill no matter who is using them*]
2. The "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season [before July 1](#) is wrong. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. The proposed slot limit is acceptable [*the 18% harvest reduction is necessary*]

*Thank you.*

-----  
Thomas Wisniewski  
917-885-2616



P.O. Box 1230  
Marshfield, MA 02050  
[www.stellwagenbank.org](http://www.stellwagenbank.org)

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John Richardson

March 12, 2020

Daniel McKiernan, Acting Director  
Commonwealth of Massachusetts  
Division of Marine Fisheries  
251 Causeway Street, Suite 400  
Boston, Massachusetts 02114

**RE: Winter 2020 Marine Fisheries Public Hearing and Scoping Hearing for Summer Flounder, Scup, and Black Sea Bass Commercial/Recreational Allocation Amendment**

Dear Mr. McKiernan:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA) we offer the following comments to the fishery management measures presented at the Winter 2020 Marine Fisheries Public Hearing and Scoping Hearing for Summer Flounder, Scup, and Black Sea Bass Commercial and/or Recreational Allocation Amendment:

**Recreational Striped Bass (322 CMR 6.07)**, status quo as proposed with the exception that we recommend an exemption requiring the use of circle hooks by the for-hire and commercial fleet that represents small percentage of the striped bass mortality. The for hire and commercial fisherman are experienced in the use and the appropriate means and methods of different hook types as well as sound catch and release methods reducing mortality.

**Commercial Striped Bass (322 CMR 6.07)**, status quo as proposed with the exception that we recommend that dual commercial and for-hire permit holders be permitted to sell commercial conforming striped bass caught by their clients. Continued access to the commercial fishery by the recreational/for-hire fleet is consistent with the historical access by recreational anglers or the fore hire fleet to the commercial striped bass fishery in our waters. Such precedent is also found by properly permitted for-hire vessels that are provided access to the historical Bluefin tuna and swordfish fishery in our waters to commercially sell Bluefin tuna and swordfish.



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Marshfield, MA 02050  
[www.stellwagenbank.org](http://www.stellwagenbank.org)

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**Recreational Bluefish (322 CMR 6.18)**, as proposed to adopt state limits consistent with this coast wide mandate. We hope that the regulatory community continues to develop separate seasons/bag limits for the for-hire community (ex. Black sea bass, summer flounder, etc.) such as proposed for bluefish and already exists for scup, Bluefin tuna swordfish and other select species.

Based on our observations, bluefish are subject to an approximate 10 year cycle and what we are observing is not unexpected. The stock assessment is subject uncertainty that adds to concluding the poor status of the stock. As a result of the uncertainty we agree to the proposed bag limit of 5 (for hire) and 3 (recreational) as long as future measures don't result in lower bag limits since the scientific basis behind the proposed bag limits is not clear.

We also recommend no size limits in order to continue the snapper bluefish fishery for our younger anglers as well as the need for bluefish at a range of sizes for Bluefin tuna and mako bait.

The revised MRIP results have significantly impacted the for-hire fleet specifically as it relates to black sea bass and summer flounder. As a result the SBCBA recommends that the following fishery management matters or measures be considered to assess fish landed by the for hire fleet for fishery management purposes as summarized below.

- Review of for hire landing data dating back to the 1980s to assess an historical perspective of what was landed and how that has changed over time to provide a more equitable share of the quota or ACL.
- Consider the transfer of quota and/or the ACL for select species between commercial/recreational sectors to maintain the annual totals below regulatory thresholds.
- Use of a Massachusetts specific black sea bass dead discard percentage of 5% instead of 15% for use to develop Massachusetts seasons and bag limits consistent with conditions in our shallow waters. We have tremendous numbers of black sea bass in our waters and release smaller legal size fish target adult males only. As a result the 15% threshold artificially increases the assumed



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dead discards not representative of our tremendous number and size of black sea bass in our waters landed in shallow waters.

- We recommend that state permitted for hire vessels be subject to mandatory reporting using eVTRs that is used to assess more than effort to manage the for hire landings and releases.

Thank you for your consideration of this important matter.

Very truly yours,

*Paul Diggins*

Capt. Paul Diggins  
SBCBA, Vice President  
captain\_paul@bostonfishing.com

Cc: Ron Amidon, Mass F&G

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**From:** [Kyle Schaefer](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Comments  
**Date:** Friday, March 13, 2020 10:23:01 AM

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Acting Director Daniel McKiernan,

Thank you for the opportunity to comment on proposed changes to the management of our shared marine resources. I am a charter captain and protecting these fish are vital to the health of my business.

Striped Bass:

- I support the proposed changes
- I support the requirement of circle hooks to reduce mortality
- I support the use of non-lethal devices for removing striped bass from the water

Bluefish:

- I support the lower creel limit for bluefish

Commercial Striped Bass:

- I strongly disagree with extending the commercial striped bass season in an effort to maximize the quota that hasn't been fulfilled because there are so few striped bass present. If anything we need to more conservative to protect these breeder bass so we can all enjoy more fish in the future. Let's invest in the future for us all.
- I support the adjustment in days allowed to fish
- I support the 1" increase in size limit to avoid conflict with rec and commercial fishing for striped bass

Thank you for your time and for noting my comments.

Best,

Kyle Schaefer

603.969.3050

[Soul Fly Journal](#) || IG: [@SoulFlyOutfitters](#)

[ASGA Board of Directors](#) || [T&T Ambassador](#) || [Simms Ambassador](#)

[AMFF Ambassador](#) || [Costa Pro](#) || [Hog Island](#)



**From:** [Germain Cloutier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass comments  
**Date:** Thursday, March 12, 2020 9:08:16 PM

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Dear Mr. McKiernan,

Due to the facts of many meeting closures and the lack of people attending meetings due to the fear of spreading/contracting Coronavirus I hope that many of the emails/letter/calls will be able to give a good idea of the public's input and interest moving forward with regulations.

For striped bass I hope that the coastwide slot suggested by the ASMFC of 28-35" is adopted. And I hope that the Commercial season is NOT opened early and keeps to the usual June 23rd start date. It is better to keep the season the same to ensure the data can be tracked and not have some years where harvesting was 9 months out of the year while others was over a short period of time. Also, with the state of the striped bass it would benefit all parties to ensure that some of these bigger fish that the commercial sector will be chasing make it through the gauntlet before the commercial season starts. What's good for the fish is going to be good for everyone. The proposal to increase the commercial regs by 1" to avoid having to police recreational anglers vs commercial anglers is a good idea to avoid those conflicts. Also moving the harvesting days would also be a supported movement by many I feel. And just to touch on Bluefish for a second It would be great to see their numbers comeback as well so a reduction in creek limit for bluefish would be well received. Thank you for your time.

Thank you,  
Germain

[Sent from Yahoo Mail for iPhone](#)

**From:** [Tom Fuda](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Comments  
**Date:** Thursday, March 12, 2020 7:58:27 PM

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Dear Director McKiernan,

I am writing to you today to express my concern over the proposed change to the start of the commercial striped bass fishing season from June 23 to June 1. I am a CT resident, and an avid recreational fisherman that fishes primarily for striped bass. I also take the occasional trip to MA to fish there as well. In fact I have a trip to Martha's Vineyard planned for June, primarily to enjoy the fine fishing there.

I have been following fishery issues very closely since hearing the most recent Atlantic States Marine Fishery Commission striped bass assessment, in which the fishery was declared over fished, and over fishing is occurring. I applaud your state's efforts in trying to reduce both recreational and commercial harvest by 18%. I also applaud your recent efforts to get your neighboring state of Rhode Island to adopt the same slot limit for recreational fisherman as the rest of the New England states and New York. However, I am concerned about the proposal that is under consideration to open the commercial striped bass fishery as early as June 1. I see that last year, commercial landings of striped bass in MA waters fell approximately 33% below the 870,000 lb quota. With the 18% cut, the quota for 2020 will be approximately 714,000 lbs. Given that the commercial harvest in 2019 fell well below even this reduced quota, it is clear the fishery is in trouble, and that commercial fishermen are having a hard time finding fish. Extending the fishery will only further pressure an already over fished stock. Much as MA recently did with their neighbor in Rhode Island, as a neighbor from CT, I urge you to adopt a "status quo" approach to the commercial season, and stick with the June 23 opening date to protect and rebuild this vital fishery. Thank you for your time.

Sincerely,  
Thomas Fuda

**From:** [DENNIS](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass Regis  
**Date:** Thursday, March 12, 2020 9:51:59 PM

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Please stop the killing of breeding females over 36" they are our only hope for recovery!  
Sent from my iPad.                      Thanks Dennis

**From:** [Berwyn Wetter](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regs  
**Date:** Friday, March 13, 2020 9:40:33 AM

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I am a Maine resident who has been fly fishing striped bass for 15 years. During that time I have not caught a stripper over 32 inches. Noting that the MA commercial fishing quota has not been met for 2 years would seem to suggest that legal size fish are in short supply. I would suggest that adding more opportunity to take more fish from the breeder population risks further depletion of the resource. If the commercial quota is not met this year, will there then be a year by year request to add even more days to the commercial season? In short, I am not in favor of any regulatory change that risks depleting what appears to be an already precarious stripper population. I also think stripper fishing should be limited to sport fishing only. Thank you for your attention. Berwyn Wetter, S. Paris, ME

**From:** [Luis Tirado](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 6:57:32 AM

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I wanted to add to my previous email, I believe that anyone, recreational or commercial that is fishing for Striped Bass using any form of bait live or dead should have to use in-line circle hooks. J hooks do not discriminate and hook every size fish.

Also, using gaffs on Striped Bass should be banned. Once a gaff is placed into a fish there is no going back. That fish is either dead, or wounded to the point where survivability is at a minimum.

Thank you for your time.

Captain Luis Tirado  
Diamond Pass Outfitters  
207-899-5985

**From:** [Lisa Eggie](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 7:01:03 AM

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Dear Director Daniel McKiernan

My thoughts on the proposed regulation changes:

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [*J hooks kill no matter who is using them*]
2. The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season before July 1 is wrong. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. The proposed slot limit is acceptable [*the 18% harvest reduction is necessary*]

And although it is not being considered in the proposed 2020 regulations it ought to be required that all commercial striped bass landings be tagged at point of capture and not point of sale as it is now. Current regs are a tacit endorsement of the rampant illegal black market in stripers.

Additionally, requiring that the entire commercial quota consist of large breeder females is counter productive to the attempted recovery of the species.

Sincerely,

Duane Eggie

**From:** [Josh falk](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 10:57:02 AM

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Greetings, Acting Director Daniel McKiernam.

I am writing to voice my opinion on the matters of preserving the Striped Bass fishery.

I think a slot limit would help slow the declining rate of this species. This should apply to both commercial and recreational fisher-men and women.

There is no need to use a gaff to land a fish. In the event that the fish is too small to harvest or too large(should a slot limit be imposed), gaffing a fish will drastically reduce the likelihood of that fish's survival.

I myself use Circle hooks religiously and have found that the mortality rate has been reduced significantly for all fish species.

The commercial season shouldn't be opened sooner than July 1st. The fish need to migrate to their breeding grounds and need to complete that cycle to preserve the population of the species.

We need not change the days in which the commercial fisherman can harvest the Striped Bass.

Thank you kindly for listening to my concerns.

Best regards

--

Josh Falk  
[www.joshfalk.com](http://www.joshfalk.com)  
[www.studiofreshboston.com](http://www.studiofreshboston.com)

**From:** [NORMAN HYETT](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Thursday, March 12, 2020 4:47:34 PM

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It is essential that striped bass over 35" be protected from both recreational and commercial fishermen. Circle hooks should be used by both groups to insure a better release, and "snag and drop" techniques should be banned when fishing with Menhaden.

Captain Norman Hyett  
238 Winthrop Shore Drive  
Winthrop, MA 02152  
6179090912

Sent from my iPhone



**From:** [Dean Clark](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** striped bass regulatory proposals 2020  
**Date:** Thursday, March 12, 2020 8:44:53 AM

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To: Acting Director McKiernan, Massachusetts Division of Marine Fisheries

From: Stripers Forever

Stripers Forever supports the MA Division of Marine Fisheries and Acting Director McKiernan's proposal implement the ASMFC mandated 18% reduction by following the recommended recreational slot limit of 28-35 inches. We also applaud the MADMF for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have.

We are also appreciative of Acting Director McKiernan's letter to Rhode Island encouraging them to fall in line with the other states that are accepting the ASMFC proposed steps to accomplish the mandated 18% harvest reduction in striped bass and do so without Conservation Equivalencies.

Stripers Forever does not support raising the commercial minimum limit to 36 inches because we think that targeting only mature breeder female striped bass for commercial harvesting is counter productive to the efforts being made in the recovery of this fishery. We are also concerned that many recreational fishermen will purchase commercial permits in order to legally harvest fish larger than the recreational slot limit allows thereby putting even more harvesting pressure on female breeder bass. We hope this can be addressed.

Another issue of concern is MA not following the ASMFC's Law Enforcement Committee's recommendation that all commercially harvested fish be tagged at point of capture not point of sale as is the regulation in MA. This loop-hole allows for the existence of a black market in striped bass that is harmful to both the legitimate commercial fishermen and the species itself because the illegal harvest goes unreported and can't be factored into the responsible management of these already over-fished species. We strongly suggest that this be addressed and changed to be consistent with with the recommendations of the ASMFC.

With specific regard to other proposed regulations for 2020 regarding striped bass:

We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.

We feel that what is commonly referred to as the "no gaff" rule ought to apply to commercial anglers as well as to recreational anglers.

We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting before they can migrate north out of our waters.

We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial "part-timers" (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.

Thank you and the MMFAC for taking the above into consideration.

Brad Burns - President Stripers Forever

Dean Clark and Fred Jennings - Co-Chairs, MA Stripers Forever

**From:** [Steve Murphy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Friday, March 13, 2020 9:12:59 AM

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Mr. McKiernan

Thank you for what you and your team do. I realize you are in the unenviable spot between the commercial and recreational interests of the striped bass fishery.

As a bit of background, I am a recreational fly fisherman with a 22 center console in the Merrimack river. I have fished more than 100 mornings a season for the last 20 years. I am fortunate I can get out and fish for a few hours before my work day. I bend down the barb on my flies and release all the fish, with the rare exception of a legal fish that is hooked deeply and will likely die or if a guest wants to keep one for the table. In the last 20 years, I have kept about a dozen fish. I absolutely realize there is mortality associated with catch and release and do my best for all the fish landed on my boat to survive.

As you know, I have seen the very best of the recovery of a near decimated striper population to an amazing comeback. Unfortunately, I believe it is going to crash again. We simply are killing too many breeders and the harvest is still too liberal.

My thoughts of the proposed regulations:

1. The 18% harvest reduction is necessary and proposed slot limit is acceptable
2. Why does the "no gaff" rule not apply to commercial anglers as well as recreational anglers? I use a Boga Grip and keep fish in the water. Please consider changing this rule.
3. Recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks with bait.
4. Please reconsider opening the commercial striped bass season before July 1. This exposes large migratory breeder females to increased harvest.
5. Changing the open days for commercial harvest to Monday and Wednesday is wrong. This hurts the legitimate Commercial fisherman by encouraging part-timers. I understand the commercial fishing interest, but support this group, not the part-timers.

Thank you for your consideration and time. Also, please consider increasing the license fees to help support law enforcement.

Please feel free to contact me if you have any questions.

Best regards.

**Stephen V. Murphy**  
**Chief Executive Officer**  
Northshore International Insurance Services, Inc.  
199 Rosewood Drive  
Suite 310  
Danvers, MA 01923-4539

Office: 978.745.6655 ext. 9037  
Direct: 978.705.4437  
Mobile: 978.314.8213  
Fax: 978.741.1642

Email: [smurphy@niis.com](mailto:smurphy@niis.com)  
[www.niis.com](http://www.niis.com)

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**From:** [Hoyerman, Bill](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Thursday, March 12, 2020 4:39:13 PM

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Hello Dan McKiernan and others who may be concerned, I have been an enthusiastic striped bass fishermen all my life. We have seen the ups and downs in the population and are undoubtedly in a downward spiral. Please do what you can to limit this. A bass is worth far more alive than on ice. I believe the commercial fishery in Mass and various regulations up and down the eastern seaboard has been the cause of the decline in this fishery. I know a slot limit would help and one that targets fish under 28-inches; why do we continue to kill the breeders in this state?

Please don't change the commercial fishery to June 1, I think July 15<sup>th</sup> makes far more sense. I know numerous commercial bass fishermen and all of them do it to write off their equipment, boats, etc. – all of them that I know have other primary incomes and do not depend on it as an income. Guides need income too and without the stripers they will suffer and the guide I know this is their principal income. Walk the canal sometime in June and see the slaughter. I enjoy eating striped bass, too but want my grandchildren to enjoy them also, and the small ones are fine to eat!

Please don't let our generation do to these sport fish what happened to so many migratory species. Look at how Florida has benefitted with proper gamefish management.

I would love to discuss this if you have the time.  
Thank you,  
Bill

**William R. Hoyerman, LSP**  
Civil & Environmental Consultants, Inc.  
31 Bellows Road · Raynham, MA 02767  
Direct: 774-409-2711 · Fax: (774) 501-2669  
Mobile: (781) 799-9506 · <http://www.cecinc.com>  
[bhoyerman@cecinc.com](mailto:bhoyerman@cecinc.com)  
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**From:** [trout21](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Bass Regs  
**Date:** Thursday, March 12, 2020 5:50:05 PM

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We need to reduce the mortality rate of striped bass. We need to require everyone fishing from stiped bass in Massachusetts using bait use circle hooks. We especially need to ban the use of gaffs on striped bass. A gaffed striped bass is a dead striped bass. I have seen boat fishermen gaff short bass in the body and throw them back. Outrageous.

Traditionally, when there was a healthy population of striped bass, the quota was filled within the traditional commercial period. I strongly oppose extending the season. The fact that commercial fishermen cannot fill the quota within the traditional period should be seen as a measurement of the trouble bass are in. Extending the season will only further harm the stock. I also oppose changing the days of the week for commercial fishing.

We also need to establish a tagging system for the harvesting of striped bass. The lack of an effective tagging system invites abuse.

Thank you

John Kaufmann

Sent from [Mail](#) for Windows 10

**From:** [Robert Cameron](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper fishing  
**Date:** Thursday, March 12, 2020 6:19:38 PM

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I feel closing commercial striper fishing until after a reasonable time is allowed to allow female stripers to give birth unobstructed is reasonable and prudent to protect the future of the species. I remember when the stripers were depleted and a new program designed to save future striper fishing was instituted . Please don't make the same mistakes made in the past. Delay commercial striper fishing now and the stripers will do the rest.

Thank you,

Robert Cameron, life long  
Striper fisherman.

Sent from my iPad

**From:** [Bernie&Bev Rubalcaba](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper regulations  
**Date:** Thursday, March 12, 2020 4:36:51 PM

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Please protect our Striper resource. I am a fly fisherman catch and release with barbless hooks

Sent from Bernie Rubalcaba's iPhone

**From:** [Isaac Thomas](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stripers  
**Date:** Thursday, March 12, 2020 5:38:10 PM

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Due diligence to save our fish ASAP!!

TEACH ENVIRONMENTAL POLICE TO DO A BETTER JOB OF PATROLLING AND  
EXPLAINING TO NON-ENGLISH SPEAKING IMMIGRANTS TO ABIDE BY THE  
LAWS.  
ENFORCING THE LAW TO THE T!

**From:** [Daniel Wells](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Weighing in on MA Proposed Regulations  
**Date:** Friday, March 13, 2020 8:38:37 AM

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Dear Department of Marine Fisheries,

I wanted to let you know that I am in favor of requiring all live bait to only utilize circle hooks. In fact I went on a charter boat and the captain insisted on rigging our live mackerel with two treble hooks even after I asked to use a single circle hook. He said "anglers" never land bass on circles which tells me he is just lazy and killing lots of undersized fish leaving treble hooks in them. So please implement the circle hook mandate and enforce it ruthlessly. We need to cull captains like that one.

Gaffing striped bass is not needed they can get a big net if the captain is really concerned about landing a fish. Please create and enforce the "no gaff" rule.

The commercial season should not begin before 1 July so please do not allow an early opening. Also commercial days should remain the way the regulation currently exists.

The slot limit is better than current regulations so please implement it. Personally I would like to see a higher and narrower slot limit of 32" to 35" to ensure younger females get more breeding opportunities before they become available to harvest, however I understand that is not on the table so the proposed slot will work for now.

I know these are not on the table, but other items of concern:

1. Regulating the Cape Cod Canal better is a priority. I have encountered so much poor angler behavior there that is severely damaging the breeding population it needs to be curbed ASAP.
2. There are too many independently wealthy rec fishermen I know that also have commercial permits. They keep limits of bass just to pay for gas money when they don't need the money at all. I would love to see a reduction in commercial permits issued and some sort of financial test applied where at least 50% of the individual's income is fishing or waterman based. I grew up on the bay with commercial fishermen. I don't want to see commercial fishing die, but I also don't like seeing people taking a commercial limit of bass "for fun" which is the case in have the "commercial" fishermen I know.

Sincerely,  
Daniel Wells  
Hingham, MA



Cape Cod Salties Sportfishing Club  
Box 1183  
S. Dennis, MA 02660

Acting Director Daniel McKiernan

Division of Marine Fisheries

Sir:

The Cape Cod Salties Sportfishing Club at a regular monthly meeting discussed at length the current proposals for the regulation of Striped Bass Fishing and have voted the following positions:

We support the recreational slot limit of 1 fish per day 28 to 35"  
We support mandatory circle hook use for all bait fishing  
We support the no gaff regulation for all striped bass fishing

We do not support the proposal to open the commercial season before July 1.

We do not support the proposal to change the commercial designated fishing days from Mon and Thurs to Mon and Wed. (over the past few years we have all adapted to the existing schedule for our recreational access to the many boat ramps in our area for either fishing or family boating. We avoid the commercial fishing days because the boat ramp parking lots are full, and we have modified lives accordingly regarding issues of work, child care, grandchildren care and wish this to remain consistent).

The commercial regulations should be the same as the recreational regulations regarding circle hooks for all bait fishing and no gaffs allowed.

C. Randall Sherman

VP Cape Cod Salties Sportfishing Club

508 280 8825

F/V The Boys  
21 Squirrel Hill Lane, Hingham

F/V Charles Seabrook  
21 Wollaston Street, Wollaston

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**To:** Acting Director, Daniel McKiernan  
**From:** Erik Waal and Mark Plachowicz  
**Date:** March 16, 2020  
**Subject:** Public Comment, 322 CMR §6.22, §6.28 & §6.34

Mr. McKiernan,

Thank you for the opportunity to comment on 323 CMR §6.22 (A &B), §6.28 (B) & §6.34 (C). Each of the proposed amendments detailed above, will have an overwhelmingly positive benefit to our businesses.

**322 CMR §6.22 (A) - Increasing Summer Flounder Trip Limits to 400 pounds.**

This is a significant amendment and will positively impact all vessels and individuals engaged in the fishery. The approach of increasing by 100 lbs for mobile gear and 50 lbs for rod and reel fishermen, ensures equitable access to both gear types. The increase is timely and will enable the fleet to capitalize on the higher, early season prices, land more fish and not impact what has been a historically stable supply and demand fishery.

The fleet had difficulty landing the allocated quota for the 2019 fishing year and left more than 25% on the table. With the additional ~260,000 lbs allocated to the 2020 year fishing year, we agree and feel this is a cautious and appropriate approach while ensuring increased landings are utilized.

Is there an option to request one consideration? Where the main goal of the advisory commission is to maximize 100% of the allocated quota, is there a way to unilaterally approve/pre-approve an increase to 500 lbs per day for mobile gear, if 50% of the quota is not caught by a certain date?

**322 CMR §6.22 (B) - Trawlers to retain and land two consecutive daily limits of summer flounder.**

This was a great benefit to both of our businesses. By allowing the two consecutive days of landings it allowed us to fish a wider area, the boats didn't need to rush to meet trucks and allowed both boats to adjust to weather days to get back to the dock.

This should also be heralded as a prime example of the industry and fisheries managers working together to achieve mutually beneficial changes and aligning to a common goal.

F/V The Boys  
21 Squirrel Hill Lane, Hingham

F/V Charles Seabrook  
21 Wollaston Street, Wollaston

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**322 CMR §6.28 (C) - Commercial Black Sea Bass**

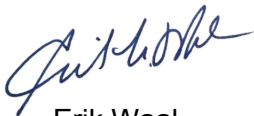
We offer our full support for the 100 lbs incidental catch limits during the small mesh squid fishery. While we rarely see that kind of volume when engaged in squid fishing, in the event that we do happen to land more than 50 lbs Black Sea Bass, it will be helpful.

Similarly, we offer our full support for the considerations detailed for the large mesh fishery as well. During the summer flounder fishery we rarely see any sizable volumes of Black Sea Bass, but it is encouraging and could be an important part of our economic model to be able to retain those landed fish, should the opportunity present itself.

**322 CMR §6.34 - Commercial Horseshoe Crab Trawl Limits**

The proposed 75 crabs per day, open access permit for managing incidental catch is an appropriate consideration and addresses the frustrations of current limited access permit holders. Further it restores the viability of the limited access permits and their intrinsic value to the current permit holders.

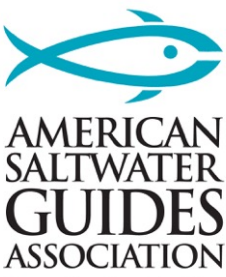
Thank you,



Erik Waal



Mark Plachowicz



Promoting Sustainable  
Business Through  
Marine Conservation

Dear Mr. McKiernan,

The American Saltwater Guides Association appreciates the opportunity to comment on proposed regulation changes for Massachusetts for the 2020 season. Massachusetts has a long history of taking the lead in marine conservation issues.

We would like to go on record thanking you for your recent letter to Rhode Island requesting that they adopt the same size limits for striped bass as neighboring jurisdictions. We strongly believe that standard coastwide regulations are key to striped bass recovery. Your efforts did not go unnoticed.

**1) Recreational Striped Bass (322 CMR 6.07)**

- a. We support the proposed changes
- b. We strongly support the use of circle hooks
- c. We strongly support the use of non-lethal devices for lifting striped bass from the water.

**2) Recreational Bluefish (322 CMR 6.18)**

We support the lower creel limit for recreational bluefish harvest in 2020. Again, standardized coastwide measures will ensure the recovery of the bluefish stock in a little time as possible. This also fulfills our commitment to the Magnuson Stevens Act in relation to the overfished status of bluefish.

**3) Commercial Striped Bass (322 CMR 6.07)**

We support the 18% reduction in quota for striped bass in the commercial sector.

- a. We do not support expanding the commercial season with an earlier start date. Now is not the time to extend seasons for any sector. We must all work together to recover striped bass. If seasons must be extended to hit the quota, then we know the stock is in trouble.
- b. We support the adjustment in days allowed to fish
- c. We support the 1" increase in size limit to avoid potential conflicts with overlap between the recreational and commercial fisheries

The American Saltwater Guides Association is not opposed to commercial fishing for striped bass. We feel that the current status of striped bass presents a unique opportunity to revamp the commercial system in Massachusetts. Our concern is that some recreational anglers will obtain commercial permits only to be able to kill larger fish. This situation could take opportunity away from the commercial striped bass fisherman who depend on the season for income.

Peter Jenkins,  
Chairman

Board:

ME, Capt. Kyle Schaefer,  
Soul Fly Outfitters

NH, Capt. Peter,  
Whalen, Shoals Fly  
Fishing and Light Tackle

MA, Capt. Jamie, Boyle  
Boylermaker Charters

RI, Capt. Dave Monti, No  
Fluke Fishing

CT, Capt. Ian Devlin,  
Devlin Fishing

NY, Capt. Paul Dixon, To  
The Point Charters

NJ, Capt. Geno Quigley,  
Shore Catch Charters

DE, Tyler O'Neill,  
Norvise

VA, Capt. Chris  
Newsome, Bay Fly  
Fishing

NC, Capt. Tom Roller,  
Waterdog Guide Service

Washington, DC, Rich  
Farino, District Angling

Capt John McMurray,  
President

Tony Friedrich,  
VP/Policy Director



**AMERICAN  
SALTWATER  
GUIDES  
ASSOCIATION**

Promoting Sustainable  
Business Through  
Marine Conservation

Peter Jenkins,  
Chairman

Board:

ME, Capt. Kyle Schaefer,  
Soul Fly Outfitters

NH, Capt. Peter,  
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Fishing and Light Tackle

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Shore Catch Charters

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Norvise

VA, Capt. Chris  
Newsome, Bay Fly  
Fishing

NC, Capt. Tom Roller,  
Waterdog Guide Service

Washington, DC, Rich  
Farino, District Angling

Capt John McMurray,  
President

Tony Friedrich,  
VP/Policy Director

We would appreciate an opportunity to work with the state to develop a new framework that ensures the future of small scale commercial striped bass fishermen that truly depend on the fishery. With the quota dropping by 18% and the new regulations for recreational fishermen, there is a chance that the true commercial fisherman will be negatively impacted by increased activity from anglers who are not dependent on this season.

We thank you for your time and consideration on these important issues as they directly impact our ability to contribute to the economy of Massachusetts. We look forward to further conversations on how to enhance the commercial fishery for those who are truly dependent on it.

Respectfully,

*Tony Friedrich*

*Jamie Boyle*

**Tony Friedrich VP/Policy Director**

**Jamie Boyle Massachusetts Board Member**

**From:** [Mohawk Bolin](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attention Dan McKiernan  
**Date:** Tuesday, March 17, 2020 1:53:55 PM

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

Hi Dan,

Hope you and the staff up there are doing well and staying safe up there.

I'm writing in regards to the coming Black seabass season. I have spoken with many commercial fisherman from Cape Cod , the Vineyard and the south coast. Also a couple of dealers and restaurant owners. All the fisherman I spoke with, mostly pot guys, want to see us get rid of Sunday's. The general consensus has been not going up on weekly catch and going 2 days a week.

In theory this would extend the season and give the dealers and restaurants a steady reliable market. Which hopefully would translate into more demand and higher prices.

Other advantages would less overhead and also less gear in the water. We all know the importance of having less end lines in the water.

Please consider these changes and make a good thing a good thing.

Strange times we are living in right now. Good luck and stay safe!

Regards, Mohawk Bolin  
F/V Rock&Roll  
Sent from my iPhone

**From:** [John Hoy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Black sea bass comm. regs.  
**Date:** Monday, March 16, 2020 9:40:24 PM

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Dear DMF, I favor the two day (Tuesday, Thursday) fishing week. Most guys I know on the Vineyard do as well. I think the price will be better.

If there's a little quota left at the end, we can try something else next year. No big deal.

Thanks, John Hoy

**From:** [Gerald Audet](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comments on 2020 Striped Bass Season in Mass  
**Date:** Monday, March 16, 2020 4:26:45 PM

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ATTN: Acting Director Daniel McKiernan

I am writing with comments on the Striped Bass regulations for the 2020 season in Massachusetts

I want to voice my VERY strong concern about the health of the fishery. We are in serious trouble. The fishery is at risk of great peril.

Therefore, I support:

Both recreational and commercial anglers should be subjected to the same rules regarding the use of circle hooks. NO J HOOKS!

The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers.

Opening the commercial striped bass season before July 1 is wrong. The last thing we need is MORE opportunities to kill kill. This goes directly counter to new conservation measures.

Changing the open days for commercial harvest to Monday and Wednesday is wrong- this also makes no sense!

The proposed slot limit is acceptable, although I adamantly believe it will not be enough. However, coast wide consistency is important at this point. We MUST reach at LEAST a 18% coast wide reduction. It seems to me the timeline is unreasonably long, and we should be shooting for 25%, but if this is my only option than that is what I will accept.

Thank you

Dr. Gerald Audet  
Douglas, MA



**From:** [Frederic B. Jennings, Jr., Ph.D.](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Fred Jennings Comments on MA DMF Proposed Striped Bass Regulations  
**Date:** Saturday, March 14, 2020 7:46:19 PM  
**Attachments:** [CEEEE Letter to Acting Director of MA DMF McKiernan on MA WSB Regulatory Proposals on 14 March 2020.pdf](#)

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## ***Center for Ecological Economic and Ethical Education***

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email:

Acting Director Daniel McKiernan

Division of Marine Fisheries

251 Causeway Street, Suite 400  
**Regulations**

**RE: Proposed Striped Bass**

Boston, Massachusetts 02114

By email to: [marine.fish@mass.gov](mailto:marine.fish@mass.gov)

Dear Acting Director McKiernan:

I am writing to you today in regard to your request for comments and thoughts on the proposed reduction on striped bass harvest of 18%, and on how this reduction might be implemented in the most effective manner.

I have fished for wild striped bass (WSB) for 65 years, mostly in the area of Ipswich. From about 1993 until around 2003, we had the best fishing I have ever had (anywhere in the world for any species) in this particular fishery; we had the makings of a world-class blue-ribbon fishery that was attracting people to Massachusetts from all over the world. The potential for an even better striped bass fishery was very real

and within reach at that time. But instead, this potential was lost, frittered away by short-sighted regulations that failed to keep perspective on what really should have been a primary purpose: to develop, maintain and sustain a healthy and abundant resource for everyone to use and enjoy.

Protecting the *large female breeders* should be our first priority, as their health and numbers represent the future of this fishery, for better or for worse. Selectively culling the brood stock is a disastrous strategy. That is some of the basis for the recommendations that follow. Another concern is one of *equitable treatment* for all participants in this fishery. But the most important need in this situation is to *reduce the mortality* of these fish.

Here is what I would propose:

1. ***On the use of circle hooks***: I am glad that MA DMF has finally begun to advocate the use of circle hooks in this fishery, where the vast majority of fish caught are released. However, I would suggest that circle hooks be required (or, at least, strongly recommended) in both recreational and commercial striped bass fisheries. I am a fly fisherman, and I have used long-shanked hooks for years that I bend in such a way that the point of the hook is aimed *behind the eye of the hook* (because circle hooks have been so hard to find). I have found that this method works well to reduce deep-hooked fish.
2. ***Single barbless hooks***: I also have been bending down the barbs on all of my hooks for the last 40 years or so, once I learned this technique. It is much more sporting and does far less damage to the fish when the hook is removed before releasing that fish. I think your division should strongly advise (if not require) a use of single barbless hooks on all lures and flies in the striped bass fishery.
3. ***On the use of gaffs***: There should be no use of gaffs in the striped bass fishery, by either recreational or commercial fishermen. There is no necessity of doing so. Any claims that gaffs are necessary to handle fish from a boat are specious and absurd; that is the whole purpose of tools such as the Boga-Grip. It is impossible to judge whether an active fish is “keeper-sized” until it is fully brought in; using gaffs on such fish simply involves an unnecessary increase in their mortality when not kept.
4. ***On the proposed slot limit***: I am really glad to see the MA DMF considering a slot limit in this fishery, even of 28” to 35” (although I personally would prefer a 20” to 26” slot such as was adopted in Maine for several years). There are two benefits of a slot limit: (a) it reduces the pressure on the largest fish (which are all female breeders); and (b) it selects in favor of the most rapidly-growing fish (which are in the slot and thus vulnerable for the shortest amount of time). As a management tool, a slot limit is very flexible, as it allows one to narrow it or shift its size limits to comport with the age/size profile of the stock and thus to protect the most important cohorts for reproduction purposes. However, there is one problem with this proposed regulation: you are only imposing it on the recreational fishery when it should also be applied to the commercial fishery. Otherwise, there are two real problems with this proposal. First and foremost, it may drive a lot of recreational anglers to purchase

commercial striped bass permits simply to get around the slot limit and take larger fish (which will *increase the mortality* of large female breeders, which is what we all want to prevent). Second, not only are the largest striped bass all females and part of the brood stock, they are loaded with *PCBs and methyl mercury* in far higher concentrations than the smaller fish in the slot limit, so we shouldn't really be eating these larger fish anyway. Let's save them for reproduction, both better to conserve this fishery and to protect public health from these toxins. So I would urge you to apply this slot limit to both the recreational and the commercial WSB fisheries.

5. **On any earlier opening of the commercial striped bass season:** I am opposed to any earlier opening of this season, most especially if you are not going to hold commercial permit holders to the same slot limit as recreational anglers. Such a change will simply expose the large migratory breeder females to even higher mortality than they are currently experiencing. If the purpose of these new regulations is to reduce the mortality of these fish – and especially of their spawning stock biomass – any earlier opening of the commercial season is a very bad idea. It may defeat the whole purpose of the ASMFC 18% reduction.

6. **On shifting the open commercial days from Monday and Thursday to Monday and Wednesday:** This change does not make commercial sense to me. Having these open days on Monday and Thursday allows markets to clear a bit better, and therefore protects the price of these fish from falling due to a glut of fish on the market in a shorter period of time. Furthermore, this shift increases an opportunity for abuse since some fish caught on Tuesday in a three-day spree could be sold as 'fresh' on Wednesday. The economics suggests that leaving the legal commercial days on Monday and Thursday makes a lot more sense.

7. **On the equal 18% reduction targeted for recreational and commercial mortality:** I was glad to hear that this equal reduction was endorsed by the ASMFC, and I hope MA DMF adheres to this idea. It would be grossly unfair to reduce the recreational mortality by a greater amount than the commercial mortality.

8. **On the use of an 18% targeted reduction in mortality:** I am very concerned that this reduction has only a 50 percent chance of success, which also means that it has a 50 percent chance of failure! Given the long and sorry history of mismanagement of this fishery, my own personal view is that a **full moratorium** on any harvesting of striped bass should be imposed, to assure their long-term viability. That would involve hard political decisions on your part: to end the commercial harvest (at least temporarily) altogether and to make the entire recreational striped bass fishery also catch-and-release. That would be my own view – as a personal preference – but I am not under any illusions that MA DMF would consider such an option.

So those are my thoughts on the matter. In sum, I would ask you to require **circle hooks** for both commercial and recreational fishing on all lures and flies, and furthermore to require **single-barbless hooks** in both of these fisheries as well,

which should reduce their mortality upon release. **Gaffs** should be outlawed for every use in this striped bass fishery, for similar reasons. Adopting a **slot limit** is a good idea, but I think it should be applied to smaller fish (and perhaps be narrower), and this slot limit should also be imposed on the commercial fishery.

I wouldn't change the **commercial fishing days** from Monday and Thursday to Monday and Wednesday, and I wouldn't open the **commercial season** a month earlier (on June first) instead of on July first. The **18 percent reduction** should apply equally to both the recreational and commercial fisheries, although that restriction only offers a 50 percent chance of success (and thus a 50 percent chance of failure); consequently, my own *personal* preference would be to favor a complete **moratorium** on harvesting *any* wild striped bass (at least temporarily), just to allow this species to recover, due to its much-depleted condition. We could revive a world-class fishery in Massachusetts if we had the courage to protect it in this manner with a complete (temporary) moratorium.

Thank you for your role in helping to conserve and protect this important species. I hope that my sharing of thoughts on this fishery are found helpful and useful in your efforts to guide policy for the best interests of this fishery and the public at large.

Most sincerely,

Frederic B. Jennings Jr., Ph.D.

CEEEE President and Founder

**From:** [Paul Unangst](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** proposed adjustment to summer flounder and horseshoe crab limit  
**Date:** Monday, March 16, 2020 1:27:49 PM

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ATT Dan McKiernan

3/16/20

My name is Paul Unangst from Marshfield Mass fishing on my boat Destiny for summer flounder in Nantucket Sound for over 30 years.

i am writing to give my opinion of the proposal DMF has out for the upcoming 2020 summer flounder and horseshoe crab limit.

I would like the trip limit for fluke to stay at 300 lbs . Last year was a lot different from years past for many reasons there was a lot of weed around nantucket sound that

would plug our nets each tow which really reduces your catch on fluke by closing the net up and reducing your towing speed. If the quota were to increase the areas in the sound will never get any rest from boats never mind if boats were allowed 2 days limit.

I would also recommend not to allow the pilot program to land 2 consecutive days limit in one day. My letter would be to long to explain the problems with allowing 2 limits on vessels even thou there would be days that it would be easier for me to go into Nantucket and fish another day to get 2 limits there are way to many negatives that would make this program not work.

I would also like to recommend the horseshoe crab limit for cap permit holders that do not hold a limited entry permit to be at 200 crabs instead of the 75 crabs suggested.

Last year was the first year the crab quota was caught there were crabs every area we fished last year in the sound even places that had very few in years past.

Thank you

Paul Unangst

**From:** [william.martin](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed Regulations to Protect the Striped Bass  
**Date:** Monday, March 16, 2020 3:23:42 PM

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Though I live in Maryland, I have fished for stripers twice yearly for over twenty years. The June and Sept fishing has been exceptional and warranted our coming to both MA and RI. My trips are at risk now. I cant justify ,my own harvest.

We (esp the recreational anglers) are trying to do our part in MD to protect the local and important brood stock of stripers. Our biggest problem has been a lack of reporting recreational mortality plus a terrible problem with commercial fishermen illegally harvesting huge mounts of mature fish. (Their astoundingly large harvest is not even estimated by ASMFC.!) Our Governor has listened far too closely to his commercial fishing constituents and even fired the two most talented fisheries managers we had.

The striped bass breeding population is clearly in trouble once again.

I have recommended to our Maryland managers that we in MD reduce our catch by more than 18% taking reductions equally from commercial and recreational constituents. Recognizing their greater impact on the states' economies, I also recommend that we make striped bass a recreational fish only. Supporting 40 or so commercial fishermen ,simply doesn't make economic sense.

I would also like to comment on the impending MA regulations. I favor the following:

Have a shorter season for both commercial AND recreational fishermen.

Protect all large breeding striped bass. This is best done by a thoughtful slot system. It makes me sick to see 45-50 inch roe laden stripers in Wegmans stores Maryland in July Aug. and early Sept. Your state can argue about the slot sizes, but one thought is to allow a slot of between 27" (or 28") and 35". Return all fish over 35. I suggested this to a commercial fisherman in Pt. Judith and he threatened to throw me in the harbor.

Require that all bait fishermen use circle hooks.

Gaffing of stripers should be prohibited. (I had two guides gaff very large breeding stock fish without permission despite my prior instructions that I want to return all large fish for breeding. Since I do not eat large stripers due to mercury poisoning, they kept the fish and probably sold them for profit to unknowledgeable consumers. I hope they did not feed children. I no longer fish with those captains.

William H. Martin, Ph.D.  
20 Aintree Road  
Towson MD 21286  
410-321-7859

**From:** [Barry Woods](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Mass proposed Striped Bass Regulations  
**Date:** Sunday, March 15, 2020 8:41:51 PM

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Dear Acting Director McKiernan

I am a dedicated saltwater recreational fishermen, who fishes from shore and boat in the waters of Cape Cod from May through October. I have done so since I was in junior high in 1973.

I own a property in Falmouth, MA and a boat. I spend thousands of dollars every year in service to my obsession

I am seriously concerned with the current status of large striped bass throughout their normal range.

Last year MA hook and line commercial folks were not able to fill their quota of large bass. The same will be true this year. Extending their season to allow them to fish in June, allowing gaffs, changing days to earlier in the week, are not well conceived, especially opening the season sooner. We are all in the same boat and commercials should not be given more leeway to try to kill fish stock that are not in a healthy condition. They should find more fish due to the slot limit settings, even in their regular season parameters.

As a recreational angler, I would support much more stringent limits on bass for everyone, including myself. If we do not stop the decline, all of us will suffer.. for years to come.

I supported allowing the taking of larger bass (over 35") rather than the slot limit to prevent hammering the exist healthier classes of fish. We should fund policing the Cape Cod Canal and the abuses that recreational anglers visit on a large proportion of breeding female fish in that kill zone. There are many things DMR can do that will help the situation. Make all fish that are sold be tagged when caught- something most other states require to enable law enforcement to identify where and when a fish was caught- and by WHO.

I urge you to keep the existing commercial regs as they are and do more to enforce the current regs for everyone. I hope that we see recovery begin this year if we all sacrifice a bit.

Thank you for your time.

Sincerely,  
Barry Woods

**From:** [LaRee Goulet](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Striped Bass regulations  
**Date:** Sunday, March 15, 2020 11:11:09 AM

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Mr. McKiernan,

Please consider the seriously depleted state of the striped bass stocks in any new regulations you are supporting. It is clear to all that have spent a lifetime fishing for striped bass that the fish stocks are in trouble. Please do the right thing and protect what breeding fish are left. Any more pressure on these fish will ultimately result in a total collapse of the stock, assuming that it isn't too late already. Nobody benefits when the fish are all gone.

Thank you for your consideration.

Bob Goulet  
Biddeford Me.



**From:** [Arno Ewing](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attention: Dan McKiernan  
**Date:** Saturday, March 14, 2020 1:26:33 PM

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Hey Dan,

Thank you for coming to Martha's Vineyard Thursday to talk about the regulation changes. My name is Arno Ewing, I was at the meeting. I'm 29 years old and have been working as a commercial fisherman, year-round, for my sole income, for the last 10 years. I thank you and the department for helping to keep the stocks managed.

Because the science is showing 90 percent of fish removals coming out of the recreational sector with discarded fish accounting for the highest mortality, I think it would make sense to impose a catch and release limit for the recreational fishery. Think about it, no more than 10 fish may be caught and released by any rec. angler. If one of those fish falls within the keeper bracket, of course they may keep and eat it. I'm all for recreational fishing, especially if you're trying to get a meal out of it. For many years there have been upwards of 50, some days over 100, recreational boats fishing for schoolie to keeper sized striped bass in the middle ground rips in vineyard sound. People brag about catching 50 or more schoolie bass in one fishing session. I know that this kind of "sport" mentality generates waste of this precious resource. Too many fish are dying just so people can have the thrill of feeling them struggle, not for the nourishment of feeding their families or community. This is obviously happening in many more places than just middle ground. I'm sure that anyone who cares and reads the stock assessment report will limit this kind of activity, and if they are practicing catch and release de-barb their hooks and not use treble hooks. For people who don't read the report and don't know what's going on, if they hopefully see the recreational regulations, they will see that they need to take it easy with these fish.

Years ago when the striper stocks have gotten low, a catch and release limit might not be as important, but in today's world with an exploding human population and many other species being squeezed out, I believe a catch and release limit is something seriously worth considering. It would obviously be somewhat of an honor system, but still worth it. There are microplastics compromising the immune systems of marine life (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6132564/?report=classic>). The waters are warming and becoming more acidic. Every year more and more seabass are becoming riddled with worms. Have you seen this? Worms in seabass? I just noticed it for the first time two years ago.

Thank you very much for reading this and considering a catch and release limit. If one is imposed or at least mentioned, there will be less fish being hooked and handled, therefore less fish being discarded dead or too injured to feed.

Sincerely,  
Christopher Arno Ewing

**From:** [keith.peterson](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attn: Acting Director D. McKiernan  
**Date:** Friday, March 13, 2020 6:32:07 PM

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I am writing you to Oppose the proposed change to the Legal Selling Days for Stripe Bass. The proposed change is moving the selling days to Monday and Wednesdays. I am against this. Please keep the legal selling days as Mondays and Thursdays. I see no benefit to changing the days. The current rules were changed several years ago to maximize the Value of stripe Bass. The current selling days have worked and the price per pound of Stripe bass has never been higher. The proposed change would only lower the value of the stripe bass on the open market because the fish would not be fresh for the Friday & weekend buyers.

Thank you  
Keith Peterson  
173 Jackson st  
Jefferson, MA 01522

MA Comm Permit # 168437

**From:** [drew kolek](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comment on proposed regulation changes- Striped Bass  
**Date:** Friday, March 13, 2020 5:08:35 PM

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Dear Acting Director McKiernen:

While I have no position on the requirement to use circle hooks **while fishing** for striped bass with natural baits, I am opposed to the proposal to require the use of circle hooks when having striped bass in **possession**. If a fisherman goes out in the morning and catches one striped bass and then wishes to fish for fluke, scup or sea bass he should not be required to use circle hooks for these other species. Circle hooks may be effective for striped bass but they do not work for fluke, scup and sea bass.

The striped bass swallows the bait and turns 90 degrees. As the bait pulls out of its mouth the bass is hooked in the jaw by the circle hook. Fluke, scup and sea bass attack the bait straight on and do not turn. If you use circle hooks for these species you will just pull the hook straight out of its mouth.

It should be obvious to law enforcement based on the fishing technique and the area being fished whether a person is fishing for striped bass or not.

I request that you drop the requirement to use circle hooks if you are **fishing for** species other than striped bass.

Drew Kolek

**From:** [Mark Mattson](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** comments on Proposed amendments to Division of Marine Fisheries regulations  
**Date:** Monday, March 16, 2020 10:10:03 AM

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Dear DMF,

Thank you for the opportunity to review and comment. In general I support more restrictive limits on commercial fishing and I support most changes to recreational fishing. I have a few specific comments:

- 1) 6.07:4c you missed on 34 inch to 35 inch sentence.
- 2) Why not make circle hooks mandatory immediately instead of 2021?
- 3) Why allow commercial to take the big reproducing females >35 inches??? I would think the best way is to allow the same as recreational fisherman, but put much more strict limits on the lbs allowed for commercial.
- 4) There should be limits on trawlers to use brief trawls and return undersize fish more quickly to reduce mortality.
- 5) on recreational bluefish, can we let public, especially kids, catch 5, smaller snapper blues as long as all are less than , say 24 inches? Sometimes that is the only option for a dinner and those fish are not reproducing.

thank you, and good luck.

Mark Mattson

**From:** [Phil](#)  
**To:** [ray@capecodfishermen.org](mailto:ray@capecodfishermen.org); [cpfcharters@yahoo.com](mailto:cpfcharters@yahoo.com); [charlie@quinnfisheries.com](mailto:charlie@quinnfisheries.com); [timfsh154@aim.com](mailto:timfsh154@aim.com); [sooky55@aol.com](mailto:sooky55@aol.com); [McKiernan, Dan \(FWE\)](#); [Silva, Jared \(FWE\)](#)  
**Subject:** Commercial summer flounder public comment  
**Date:** Sunday, March 15, 2020 6:19:44 PM

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Dear Commission members and DMF staff.

Please consider my concerns with the commercial summer flounder trip and possession limit increases requested. My participation in state waters, mobile gear spans nearly 40 years. Early on I experienced years of intense, under-regulated fishing nearly collapsing the resource followed by increased regulation, then recovery and stability.

Three years ago the commission approved allowing mobile gear CAP holders to upgrade to 50 feet with unlimited horsepower. While I think it was a good decision for the safety of the crew the resource is feeling the impact. The upgrades are not 45 foot vessels increasing to 50ft they are 40 ft vessels increasing to 50 ft, towing much larger gear able to fish twice the weather. These vessel upgrades are happening and will continue to happen for years to come.

Wise management of our Fluke fishery is extremely important at this time with limited options besides fluke. Example

1) Sea scalloping state water ,is the worst I have seen, no one is going, its that poor.

Recent landings will show.

2) Haddock fishing Cape Cod bay was April,May its recovery peaked 2018. My average day was 4,000 lbs. It's was overfished by ground fish boats 90 fathom east of Nantucket, the core of the biomass ,with smaller mesh than we're allowed.They've moved on to juvenile monktail deep waters to the west.

3) Blackback flounders Cape Cod Bay. We have been forced out of this sustainable fishery by young aggressive Lobstermen filling in the traditional dragger tows that seasoned Lobstermen have respected.Recent blackback landings will show.

Increasing trawler trip limits of Fluke from 300 pounds to 400 pounds? Yes it makes sense with the elevated quota we are to receive, If that was the only fluke decision to be made I would fully support it.

The second decision on fluke to be made is whether to allow Two consecutive daily limits of fluke aboard a Trawler.

I live only 20 minutes from my boat, I travel home in the afternoon. Two day limit no benefit to most of us. However I am sympathetic to those that sleep on their vessels in Nantucket.They travel great distances, some from out of state weekly. If those boats fish Nantucket sound each day and land the second day, I can support that allowance if it doesn't negatively effect our fishery.

Moving forward I ask for caution and if implemented, and close supervision of the fishery as a whole.

My concern is the 50-70 ft vessel that will respond to the much bigger stock,

A typical year dragging for fluke we leave in the morning we make one tow and we're headed in at 9 o'clock in the morning with a 300 pound limit \$1,500 stock with conch bycatch. 400 lbs should produce \$2,000. And 800lbs with bycatch \$4,000.

1) We are potentially creating a fishery that enforcement cant enforce.

Your allowing a vessel to offload 800 lbs of fluke, two 400 lb limits. Did that boat fish yesterday or only fish today. Creating a 800 lb fishery from a 300 lb fishery the gross stock increases over 2-1/2 fold.

2) Will a vessel concentrate on conch in one area all day for his 1000 lbs and the next day move and catch his 800lbs fluke. If so conch resource will be impacted.

3) What other fisheries will also want the two day possession limit, example the Dayboat sea scalloping around Provincetown also a hardship, landing in Plymouth,Sandwich or returning to New Bedford.

Let's find a way to make it work for the few boats that want to overnight in Nantucket without jeopardizing the whole fishery

Thank you,

Phillip Michaud

**From:** [Thomas Howe](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Input on proposed striped bass regulations  
**Date:** Saturday, March 14, 2020 10:41:02 AM

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Hello Acting Director McKiernan. I'm an avid flyfisherman for stripers in MA waters, even though I live in New Hampshire, and offer the following comments on the proposed new regulations for stripers:

Regarding **type of hooks**, circle hooks save fish being returned to the water, and ought to be required for recreational and commercial anglers. This only makes good sense for perpetuation of this great fishery.

I endorse the **proposed slot limit**. Reducing the harvest makes good sense.

The use of **gaffs** should be prohibited for all anglers, commercial and recreational. This practice simply kills fish unnecessarily.

Regarding **commercial season**, don't open this before July 1, as this hurts the breeding population.

Regarding **tagging of commercially taken stripers**, the tags should go on the fish at the time and place of catch, not at the later time/point of sale, to reduce invitation for black market sales.

Finally, I oppose the **commercial take focusing on the larger breeding females**--this is the group we need to protect the most to ensure strong, continued stocks. Besides, the smaller ones taste better and have more tender meat!

Many thanks for your consideration.

Tom Howe  
38 Perkins Rd.  
Gilmanton Iron Works, NH 03837  
([tah.tomhowe@gmail.com](mailto:tah.tomhowe@gmail.com))

**From:** [arnold.savolainen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Mass Strped Bass Management Plan  
**Date:** Sunday, March 15, 2020 11:13:55 AM

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To Acting director Dan McKieman,

As a recreational striped bass fisherman I am in favor of the following changes:

Section 1 Recreational

Option 1a 28" to 35 "max

Section 2 Commercial

Option 2c-3 reduce quota 18% and 28" to 35%

Regards

Arnold Savolainen

**From:** [Russ Falardeau](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Opposition to starting the commercial striped bass season:  
**Date:** Saturday, March 14, 2020 9:45:47 PM

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Dear Sirs and Madams

Please direct to appropriate striped bass commercial season extension personnel.

You got to be kidding me with proposing to open the commercial striped bass season June 1<sup>st</sup>. We are suppose to be reducing the striped bass harvest by 18%. You will do this by increasing the number of days commercial fish can be harvested. Make no sense to me. And you are going to expand the number of allowable commercial harvest days and doing this at peak spring migration times for Massachusetts. What kind of logic is this, I tell you, your logic is money rules, wildlife looses.

I have had it with you guys. Bring back the Russian fishing fleet, they caused less damage to the fisheries that you guys do. I cannot see the justification for starting the commercial season on June 1<sup>st</sup>. Soon we will not need you guys anyways because there will not be enough fish to manage

Thank you for listening

Russ Falardeau



**From:** [George Marble](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed Changes to Striped Bass Regulations  
**Date:** Sunday, March 15, 2020 10:27:35 AM

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To Whom It May Concern:

First of all, I would like to applaud the commission on proposing the new slot limit for the taking of striped bass. We need to save this remarkable resource that we are blessed to have in our coastal environs.

However, please, please consider mandating the circle hook, and "no gaff" rules for all commercial AND recreational anglers. I was horrified when the captain of my charter gaffed a beautiful 48 1/2 inch striper I caught. I wanted it released, but he overrode my request...no more business for that idiot.

Finally, please re-consider the proposal to open the commercial striped bass fishing prior to July 1st. We need to increase the stocks of striped bass before we risk harvesting greater numbers of reproductive stripers.

We need to look at our striped bass situation the way Maine's lobstermen look at preserving the lobster population for future generations...it is good for commercial and recreational anglers, but most of all it is good for the striped bass stocks in our waters.

George C. Marble

**From:** [drew.kolek](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** proposed regulation changes- Commercial fluke and sea bass  
**Date:** Friday, March 13, 2020 5:51:21 PM

---

Dear Acting Director McKiernan:

I and many of my friends have been hook fishing for fluke commercially for many years. Historically, we fished in Vineyard Sound from opening day until about the second week in July and then followed the fish south to Nomans Island. In recent years, however, the fluke are sparse in Vineyard Sound and are gone by the second week of June. Fishing is not much better toward Nomans. It has been hard to make a day's pay on fluke alone.

Coincidental with the lack of fluke we have experienced an increase incidental catch of sea bass in June and early July. The ASMFC has given Massachusetts an increase in sea bass quota and *Marine Fisheries* has proposed a 100 pound incidental catch for trawlers during the commercial fluke season. We feel it is only fair that the hook fishermen be given an incidental catch of sea bass also. We propose a 100 pound incidental catch of sea bass for the hook fishery from the opening of the fluke season on June 10 until the start of the directed commercial sea bass season.

Drew Kolek

**From:** [drew.kolek](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Sea bass proposals - trip limits, open days, and season.  
**Date:** Saturday, March 14, 2020 8:47:30 AM

---

Dear Acting Director McKiernan:

I am in favor of maintaining the existing three day per week open sea bass commercial season. As the overwhelming majority voiced at last year's hearing I prefer the current open days of Sunday, Tuesday and Thursday. This will spread out the fishing week and allow for missing a day in case of bad weather.

Rather than increase the daily trip limit I would prefer to have the season open earlier. The increased daily limit will tend to drive down the price of the fish. By opening the season earlier the markets will be stabilized and price will be maintained.

Drew Kolek

**From:** [Chris Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Comments for Management 2020  
**Date:** Sunday, March 15, 2020 11:09:36 AM

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Dear Dan McKiernan

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

**If this not a red flag warning of a fishery in trouble**, I do not know what is a better example. Also, we can see that overall fish mortality, in recreational and commercial striped bass, of fully-recruited fish has continued to spiral downward since 2012 which further leads to biomass loss. Additionally, we have not even touched on the striped bass by-catch mortality from trawlers off Massachusetts, or the effects of predation on striped bass, such as seals and sharks.

We cannot deny the effects of climate on striped bass as we have seen increasing issues in the spawning grounds, such as the Chesapeake Bay, with warming temperatures, algae blooms and reduced young of the year population. One can ask why the commercial fishermen did not meet their quota. The answer is clear and simple, they could not catch enough fish. Why? Because we have depleted them and they just do not exist. The larger fish have been previously caught and removed from the population and those larger fish are the big breeding females

that produce more eggs and are the sustainers of the striped bass population.

I feel that we need to take several drastic measures.

- First- we need tackle restrictions, no treble hooks at all, circle hooks only on lures and live/cut bait. The goal is to do no harm to the fish that are caught. Have fun catching them but do no harm. (see photo)
- The current options proposed are not responsible enough to help the fishery. We need the most conservative approach.
  - THERE SHOULD BE NO SLOT LIMIT
  - The recommendation should be a total size limit of 40" for all anglers commercial and recreational – GOAL IS TO KEEP MORE FISH IN THE BIOMASS
- Additional we need to re-evaluate the data in 2021 and strongly consider is totally close this fishery in all 13 states for both commercial and recreational striper fishing. They did this exact thing in the early 80's and it worked.

I am not forwarding such recommendations without offering to help. Please feel free to contact me to help in anyway, such as collect data, analyze data or help organize meetings, or whatever you need. The goal is to have a sustainable fishery for all anglers recreational and commercial alike, this is all of our responsibility. Massachusetts needs to lead the way.

Very Respectfully-

Chris Ryan

Former Biology Major St. Michael's College

Chief Physician Assistant Cardiac Surgery at Cape Cod Hospital

5 Pioneer Path

West Barnstable, MA 02668

[cjryan93@yahoo.com](mailto:cjryan93@yahoo.com)



Note Injury - large hole in fish's lip.

**From:** [Rick Jordan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regulation changes 2020  
**Date:** Sunday, March 15, 2020 5:32:23 PM

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I am writing to ask you to adopt the most conservative regulations on both commercial and sportfishing for striped bass. Based on my fishing in the past 3 years, the population is dropping and raising great concern. Whatever stripers arrive in Maine have migrated through coastal waters of Massachusetts so we need your help.

4 years ago, my wife and I bought a house near Portland's Casco Bay so we could fish regularly. This was a \$120,000 expense on our part, so we want good striper fishing.

Thank you for your consideration.

Rick Jordan  
North Yarmouth, Maine

**From:** [Seth Adams](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regulation comment  
**Date:** Sunday, March 15, 2020 12:56:26 PM

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Hi Daniel,

Please accept this comment / request as I have been attending the meetings at mma for years.

My comment / request is to have the for-hire vessels and license holders follow a reporting structure similar to the commercial fisherman . They would need to report their client catches on “rec days “ as well as “commercial days”. The newest rules seem to be making special exceptions for this group and during my years of attending meetings they seem to get a some extra attention. I think it helps to bring some clarity around how much of the catch is indeed individual Rec fisherman vs for hire vs commercial. The data points will help form future decision making and help inform if future rules do need to continue to differentiate the three groups. Any questions or comment about this please email me or call me . 508 889 8175

Thx,

Seth Adams

Sent from my iPhone



**From:** [hhdecoys@aol.com](mailto:hhdecoys@aol.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper regulations  
**Date:** Sunday, March 15, 2020 5:50:34 PM

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Going to a slot limit is the best available option for the coming year.

All anglers both commercial and recreational should have to use Circle Hooks and should not be allowed to use gaffs.

I am concerned that Commercials are not required to tag their fish as soon as they're caught and there is no reason to open the Commercial season early or to change the open days. The recreational fishermen are the ones pouring money into the States economy the Commercials are doing their best to destroy it by killing off the large breeders.

Thanks for your time

Robert Mosher

16 Water St.

Hingham, MA 02043

**From:** [William Giokas](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Slot limit  
**Date:** Monday, March 16, 2020 2:41:28 PM

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I support 1a limit . William Giokas

**From:** [Mike Pavlov](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Management Plan Comments  
**Date:** Monday, March 16, 2020 2:01:26 PM

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March 16, 2020  
Attn: Acting Director Dan McKiernan

Dear Dan,

Thank you for reading my comments on proposed Striped Bass Regulation changes.

Like many, many others, I have seen the decline of Striped Bass to such a significant degree, if I could, I would vote to for zero harvest of any bass at all. That is until they could recover to the point where everyone of any financial status and location along the MA coast, would have a reasonable chance of success when fishing for them. That's not the case anymore.

I know zero harvest is not an option right now. ***So therefore please add my vote to be the most conservative possible measures for both recreational and commercial quota's.***

Why I'm voting this way:

#### 1. Recreational Fishery

I know you've heard this already. The poaching is rampant. I see it from shore (cape cod canal) and from my friend's boat (cape cod bay). I don't want to dismiss the science behind striped bass management but I never see estimates regarding poaching numbers as they relate to the such. There are just too many people who don't care about the future.

#### 2. Commercial Fishery

One evening after work my brother and I were fishing in his boat inside the harbor at Saquatucket. We saw some small swirls along the mudbanks so we stopped to try to catch small striped bass on our fly rods. We had fished for hours on the outside and saw nothing.

It was the day before a commercial day and we witnessed one boat after another, 24-26 footers, in almost all instances, one person per boat, heading out for open waters. These were "commercial" fisherman going out well before the commercial hours started, after work from their real jobs, to supplement their fishing hobby. Over a dozen boats went out. Do they get out to the rips 4 hours early and just sit there waiting for the commercial clock to start? I can't even afford a 14 footer right now and these boats cost in the 10s of thousands dollars, if not 100+ thousand.

I know the commercial harvest is only 10% of the recreational harvest. But there has to be some way to legitimize the fishery for true commercial fisherman.

The notion of depleting a treasured natural resource for the sake of someone making extra bucks to pay for their hobby is really disturbing.

Anyway I just wanted to provide these observations to help you understand where my vote is coming from.

Thank you for your time,

Mike Pavlov  
Brewster, MA

**From:** [alvin piper](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regs  
**Date:** Monday, March 16, 2020 5:31:20 PM

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Hello, Am I to understand that new regulations waiting to be passed regarding striped bass are: commercial length to keep is 35 in and up, still 15 fish per day and for the sport fisherman the keeper slot is 28in to 34in and keep one. If this is accurate and is supposed to be beneficial to the stock than someone needs to explain to me. My thought process must be 180\* out. The commercialists have not met their quota for at least the past two years so why let them harvest the brood stock which has a negative effect on the resource and not switch it around to 15 fish of 28in to 34in for commercial guys, which I'm sure they can fill and the sportsman can keep the 35in and up one a day, and BTW I am a sport fisherman that releases everything and I do NOT bait fish. This seems to me to have less of a negative impact on the bass. Please can we finally do something that results positively?

Thank you,  
Alvin Piper

**From:** [Gary Speed](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass Commercial harvesting is killing the State of Maine recreational fishing!  
**Date:** Friday, March 13, 2020 2:09:13 PM

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I am a teacher who has lived in Maine all my life. I have been fishing for striped bass for 25 years. The amount of fish we seen has gone down tremendously in the last 10 years! Please have more restrictive laws on Commercial fishing. We see very few big fish and hardly seen any big schools of fish anymore. I am a avid fly fishermen and release everything and it is very sad of what we have done to maintain this wonderful fish over the years. Tourism and recreational fishing is so important in the State of Maine, NH , and all of our New England States! Please pass this on as you contimplate the up in coming year of making laws! Thank you

**From:** [Stephen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass provisions  
**Date:** Friday, March 13, 2020 3:28:14 PM

---

Dear Mr. McKiernan:

I am writing you today to express my opinion on two specific provisions regarding striped bass that are being proposed.

1. I am strongly IN SUPPORT of the proposed SLOT LIMIT. As an avid angler who has fished the waters of Massachusetts for over 40 years, I am very concerned about the current state of the fishery. Although the numbers of fish may seem normal, there is a stunning lack of diversity in terms of the size and weight of fish. Every fish caught seems to be 25-28 inches long and underweight. This is a signal of an unhealthy fishery. I think a slot limit would be an excellent tool with which to address this lack of size diversity. Specifically, we need to protect the large breeding females. They are the key to ensuring a healthy striped bass fishery.

2. I am OPPOSED to the CHANGE OF THE START OF COMMERCIAL SEASON, for there will be far more large breeding females vulnerable to commercial catch. As I stated before, the health of our striped bass population depends upon protecting these large females.

I have more thoughts on how we can ensure the future of striped bass in our waters, but I feel the above two proposals are of utmost importance right now.

Thank you very much for your attention to this important matter.

Yours truly,

Stephen H. Rogers  
Nantucket, Ma

Sent from XFINITY Connect Mobile App

**From:** [Dan Connors](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 1:53:54 PM

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Please see my thoughts that run along the same lines as "Stripers Forever".

Thanks for you time,  
Sincerely,  
Dan Connors

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [***J hooks kill no matter who is using them***]
2. The "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season before July 1 is wrong. [***opening it earlier exposes large migratory breeder females to increased harvesting***]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [***hurts the legit. Commercial fisherman by encouraging part-timers***]
5. The proposed slot limit is acceptable [***the 18% harvest reduction is necessary***]



**From:** [Robert Frisbie Sr.](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Frisbie Kim](#)  
**Subject:** Striped Bass  
**Date:** Friday, March 13, 2020 2:10:33 PM

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Dear Mr. McKiernan, I'm sorry to take up your valuable time so I'll keep my email very short. I've fished the waters from New Jersey to Maine for approximately 53 years. I was educated in Cambridge and have a home on Nantucket. I've continually fished the Nantucket waters since 1972. I'm old enough to have witnessed the almost total destruction of the striped bass species in the 80's until we had the moratorium for the entire east coast. It's clear with our Massachusetts (as well as the east coast) yearly fishery data, that fish stocks are depleting rapidly. I think it's time to severely limit recreational and commercial striped bass fishing or perhaps prohibit it entirely (until the species recovers). Winston Churchill said in a 1948 speech to the House of Commons, "those who fail to learn from history are condemned to repeat it". I'm sure you'll make the right decision for the striped bass as well as mankind.

Thank you for your time.

Robert Frisbie  
42 Easton St  
Nantucket, Ma 02554  
215-327-0444

**From:** [JARRETT DRAKE](#)  
**To:** [Fish, Marine \(FWE\)](#); [Fish, Marine \(FWE\)](#)  
**Cc:** [Silva, Jared \(FWE\)](#); [McKiernan, Dan \(FWE\)](#)  
**Subject:** Public Comments on draft regulatory amendments to 322 CMR §§6.00, 7.00 and 9.00  
**Date:** Wednesday, March 18, 2020 4:51:10 PM

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**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 Acting Director Daniel McKiernan,

Please accept my comments on draft regulatory amendments to 322 CMR §§6.00, 7.00 and 9.00 as public comments to said amendment.

### **Commercial Black Sea Bass (322 CMR 6.28).**

I would like to propose a daily trip limit of 500lbs for the few commercial trap licenses and 200lbs for the commercial rod and reel sector as it was in the past. With the 59% quota increase, we are close to historical quotas when these limits were acceptable to a sustainable and still profitable fishery. The 500lb increase would at most equate to an approximate 12,000 - 13,000 pounds of weekly quota if almost all of the commercial trap fishermen were to successfully catch their maximum allocation, which is unlikely due to weather, fish-ability, and potential other factors. The commercial sea bass trap permits are significantly more expensive than the rod and reel permits, ~\$35,000 to \$30. And, we have a significantly higher equipment bill for the cost of traps, bait, and fuel to catch our quota.

400lbs is an appreciated offering, but still not quite enough to make black sea bass a viable targeted fishery. It will most likely still be a complementary fishery to lobstering or something else. I urge you to please consider the 500lb and 200lb proposal realizing its minimal impacts on the overall quota and significant benefits to the commercial trap sector while keeping the existing three day schedule.

I have always opposed weekend fishing days for any quota managed fishery. If there is consideration to a two day per week schedule, and I don't condone this, but I would like to be able to address the fishery as profitably as possible by asking for a 700lb/day quota on Monday and Thursday. Perhaps the striped bass can be moved to Sunday since it has been under-utilized the past few years?

### **Commercial Menhaden (322 CMR 6.43, 7.01, 7.04 and 7.06).**

Due to the significant reduction in herring quota, many lobstermen are starting to implement catching their own bait targeting menhaden. To hastily impose a control date without letting the bait market stabilize may

be detrimental to lobstermen throughout the State. I would ask you to reconsider a control date to 2023 or later to allow this disruption in the lobster bait market to even out while lobstermen adapt to catching their own source of bait. It is a learning curve that shouldn't be stripped away once practiced. Any lobsterman who is willing to source his own bait, should be allowed the chance to learn how to do it, now and and for the future.

I have also been a strong advocate that ALL State held licenses be owner/operator. Letter of authorizations can be issued to State approved fishermen that want certain exemptions to this.

Thank you for the opportunity to comment on this proposal. I hope you strongly consider my recommendations. I feel I can speak for the majority of the commercial sea bass trap fishermen with what I have proposed.

Jarrett Drake  
508-789-9809

**From:** [Thomas Currier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass comments  
**Date:** Tuesday, March 17, 2020 4:39:15 PM

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**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 would like to comment on Addendum VI to Amendment 6 of the Interstate Fishery Management Plan. Despite the efforts by some state agencies to grab a greater share of the fish than allotted by the ASMFC required 18% reduction, I feel that Massachusetts should set the standard and propose a "no take" catch and release striped bass fishery. The moratorium enacted on both recreational and commercial striped bass fisheries in the past resulted in the most successful management success story that the ASMFC has ever achieved. Striped bass fishermen often state that they need to bring home a fish for the table but I believe that those same fishermen would much rather have a healthy fishery available to enjoy.

Best regards,  
Thomas Currier

Sent from [Mail](#) for Windows 10

**From:** [Chris Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Tuesday, March 17, 2020 5:03:48 PM

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**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 **Dan McKiernan**

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

**If this not a red flag warning of a fishery in trouble**, I do not know what is a better example. Also, we can see that overall fish mortality, in recreational and commercial striped bass, of fully-recruited fish has continued to spiral downward since 2012 which further leads to biomass loss. Additionally, we have not even touched on the striped bass by-catch mortality from trawlers off Massachusetts, or the effects of predation on striped bass, such as seals and sharks.

We cannot deny the effects of climate on striped bass as we have seen increasing issues in the spawning grounds, such as the Chesapeake Bay, with warming temperatures, algae blooms and reduced young of the year population. One can ask why the commercial fishermen did not meet their quota. The answer is clear and simple, they could not catch enough fish. Why?

Because we have depleted them and they just do not exist. The larger fish have been previously caught and removed from the population and those larger fish are the big breeding females that produce more eggs and are the sustainers of the striped bass population.

I feel that we need to take several drastic measures.

- First- we need tackle restrictions, no treble hooks at all, circle hooks only on lures and live/cut bait. The goal is to do no harm to the fish that are caught. Have fun catching them but do no harm. (see photo)
- The current options proposed are not responsible enough to help the fishery. We need the most conservative approach.
  - THERE SHOULD BE NO SLOT LIMIT
  - The recommendation should be a total size limit of 40" for all anglers commercial and recreational – GOAL IS TO KEEP MORE FISH IN THE BIOMASS
- Additionally we need to re-evaluate the data in 2021 and strongly consider is totally close this fishery in all 13 states for both commercial and recreational striper fishing. They did this exact thing in the early 80's and it worked.

I am not forwarding such recommendations without offering to help. Please feel free to contact me to help in anyway, such as collect data, analyze data or help organize meetings, or whatever you need. The goal is to have a sustainable fishery for all anglers recreational and commercial alike, this is all of our responsibility. Massachusetts needs to lead the way.

Very Respectfully-  
CJ Ryan

**From:** [Michelle Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Tuesday, March 17, 2020 5:05:30 PM

---

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Dear Dan McKiernan

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

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Very Respectfully-

Michelle Ryan



**From:** [Edward Barrett](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Summer flounder comments  
**Date:** Wednesday, March 18, 2020 4:28:07 PM

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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.

To Acting Director Dan McKiernan,

In regards to the 2020 summer flounder summer period management program I believe The state should maintain the status quo landing limit(300 lbs per day).

Edward Barrett

3/15/20

My name is Tim Silva, commercial bass fisherman for over 50 years.

→

I'm against starting the season before June 23. First - There are not ~~the~~ enough people or tourist ~~to get~~ <sup>for the</sup> a supply & demand & price. Two - the most important months are July & August, Three if starting June 1 and the fish don't move into federal waters in July. The season could end the middle of July with no August fish for the public.

→

Leave the season days Monday & Thursday. Several years ago, the fishermen voted those days for most spread to keep the price up. and it has worked.

→

should the quote not be filled by mid August, we should be given an extra day to help fill the quote.

In September, we have nor'easters & hurricanes to deal with, & don't always can get out.

It should be noted it was the fishermen that voted to shorten the number of days to stretch the season out.

→

→ Another note would be to be given another day July 4 + Labor day so there are 2 days supply of fish those weeks. Is striped bass the only Massachusetts fishery close those days?

→ I've been speaking at the state public hearings for 40 years. I hope this letter will mean as much as speaking at the podium.

Thanks for your Time

Timothy J. Siskin

Acting Director McKiernan,

I am writing in regards to the following proposals;

1. I support renewing the pilot program for fluke retention. As a participant last year, it was a useful option that I used on a few occasions especially as the season progressed and the fish were farther from the mainland. On days that I used the program it saved me, on average, 40 gallons of fuel.
2. I support the increased trip limit to 400lbs per day so long as the state is monitoring the quota trend and we will not see a shortened season. I would not support any further increase in the limit during the summer months as I believe it would invite larger vessels into the fishery and hurt our ex-vessel prices.
3. No Opinion on trip limit for hook and line fishery.
4. I support the 7 day a week fluke fishery, however I would prefer 7 days a week beginning on or about October 15th. Based on my records, mid October is when I wasn't able to fish everyday because of the weather so an increase in opportunity will most likely not result in an increase in landings.
5. I would favor the status quo. As a permit holder who does not hold a horseshoe crab endorsement, I understand the interest in creating an incidental horseshoe crab endorsement however I have reservations that this is in reaction to the first time the Horseshoe crab limit has been reached. That being said, if the State does decide to go with an incidental endorsement I would like to see the limit set at a minimum of 100 crabs.
6. I support all proposals to the Black Sea bass regulations pertaining to the Trawl fishery, during both squid and Fluke seasons.

I hope these comments help in the decision making process.

Respectfully Submitted,

Robert Dutra

ATTN: Acting Director Daniel McKiernan

I'm submitting comments regarding the Striped Bass and Bluefish regulation proposals, which follow below. I participate in both the commercial & recreational Striped Bass & Bluefish fisheries. I am also on the Recreational Advisory Panel of the New England Fishery Management Council and have had a seat on that panel for over 10 years; much of the topics here are very similar to issues we have had to work out in the Groundfish fishery.

### **Recreational Striped Bass (322 CMR 6.07) & Commercial Striped Bass (322 CMR 6.07):**

One detail to point out before I go further, is while reading comments it's important to consider there are a significant number of recreational Striped Bass anglers, who typically are not aware of the very small quota of the commercial fishery or the huge release mortality of the recreational fishery, and because of such they tend to be spiteful of the commercial fishery. Often the commercial Striped Bass fishery is blamed for all abundance problems; as we know those ideas are mis-guided and the fishery only has a very small commercial component.

#### **Length limits:**

Increasing the commercial length limit and creating a slot for the recreational fishery is only going to further condense activity of the commercial fishery into certain small areas (and schools of fish), and through a situation that is nearly entrapment, will likely turn some otherwise law-abiding recreational anglers into poachers when they encounter Striped Bass above the slot. The additional logical problem here is that while commercial fishermen do not care if they are making their \$\$ off 28- or 40-inch fish, a recreational angler is extremely motivated to catch and retain "trophy" sized fish. Logically in some sense these regulations are

structured backwards, and the general recreationally-fishing public deserves access to these trophy fish as much as the commercial fishermen do.

Additionally, the mortality rate on large Striped Bass in my experience is very high, ie if I catch one > 48 inches there's a good chance it's going to die anyway. Last, if the commercial fishermen can keep large Striped Bass, and the recreational fisherman can't, it's similarly going to cause spite and increase the motivation for non-commercial fishermen to obtain permits, ie so they can retain the larger fish. The proposed regulations are just not helpful in addressing the needs of the fish or anglers. Last, structuring regulations around an occasional "recreational" fish making it into the commercial market isn't helpful. Very few commercial boats are going to head out onto the water just to catch a fish or two and the limited amount of non-compliance that might occur otherwise is not a problem that requires solving; fin clipping has already greatly diminished this problem (assuming it was a real problem to begin with).

Proposal: What would make more sense is to keep the commercial & recreational fisherman on the same class of fish and do not further pursue a slot (and keep in mind other states have similarly now dropped this idea). **My proposal for length limits would be as follows, recreational boats > 28 inches, and commercial boats (whether or not they are commercially fishing and regardless of commercial days) > 32, no slot, and allow the charter boats who are also have Striped Bass endorsements to fish under the recreational limits only if they have a paying charter on board.** By setting the regulations in this manner, a recreational boat would not be motivated to seek the commercial permit because it would generate a penalty for them in the form of a higher length limit.

### **Commercial Open Days:**

I generally fish at night for Striped Bass, as do others I know. Creating a 24-hour day starting and ending at midnight is a huge detriment to the law-abiding night fishermen, and it breeds non-compliance. The regulations all seem to have been structured around the daytime Cape Cod fishery and not how we fish for them in the waters around Boston and north to the Merrimack River; please consider the rest of the fishermen. On a typical night what we want to do is leave the dock at around 7:00 PM, fish until 5:00 AM, then go in and offload. We can't begin fishing

now until midnight, or alternatively need to start at 7:00 PM and quit at midnight, yet there are no buyers available in our area after 10:00 PM (so essentially to be compliant we only have a half of a night of fishing available to us now).

Proposal: I'm putting these in order of preference. **(1) Put the 2 open days on top of each other so at least we can fish one full night. (2) Change the start/end time to 6:00 PM so we have an opportunity to fish full nights, while others can also fish full days (3) Give us the same bag limit per open period of time but extend the period to ~36 hours, ie 15 fish per boat from midnight Sunday night until noon on Tuesday (4) Create a grace period so when we get off the water just prior to midnight, we are able to possess the fish on land until the buyers become available in the morning.**

### **Circle Hooks:**

Although I have no problem w/ circle hooks for drifting or "dead sticking" natural bait, I do 90% of my Striped Bass fishing by trolling live natural baits. Usually I'm trolling eels, mackerel, or menhaden; circle hooks work terribly for trolling these baits (ie we hook very few of the fish that strike) and with J hooks we rarely see a fish hooked other than in the jaw when fishing in this manner. **Please make exemptions for trolling, at least for live bait.**

### **Gaffs:**

This is very simple, there is no reason to ever gaff a striper – I have been using a net large enough to scoop up a 50 LB striper (and probably any striper that has ever swam) for the last 20 years and it works at least as well as a gaff, while also not harming the fish. There is absolutely no need to gaff a Striped Bass of any perceived size.

### **Recreational Bluefish (322 CMR 6.18)**

### **Split Regulations, Party/Charter 5 fish, Private boats 3 fish:**

On the Recreational Advisory Panel we have debated this concept, which has been brought up about every year for the 10+ years I've been on the panel and we have never voted in favor of such a recommendation; the panel generally consists of for-hire captains, with a large percentage from Massachusetts, and a smaller number of private anglers. There are people (consisting of only a portion of those who would benefit from it) that advocate for the idea, but they are outnumbered by those who disagree, and you can see that if you look at the transcripts. The main reason for this is people know it's unfair. Bluefish are a public resource and the public deserves equal access to them regardless of whether they are fishing from shore, from a private boat, or from a Charter or Party boat. Although on face value it might seem that increasing the retention for for-hire vessels is a kind benefit to the operators who struggle in those businesses, their businesses are no more important and pale in comparison to the impact of Private boats on tackle shops and marine businesses of all types. There is no less impact in reducing the bag limit on Private boat versus a Party or Charter boat, arguably there might be larger economic consequences to reducing the bag limit on Private boats. A small number of businesses should never be a priority over fair public access to this resource.

Proposal: **Make the bag limits the same for all boats, ie Private, Charter, and Party boats; it could be 3 fish, 4 fish, or 5 fish.**

Thank you for consideration of my comments,

Jon Sterritt



To Whom it may concern:

March 17th, 2020

I am commenting on the Bluefish stock status seeing as the public comment meeting at Mass maritime was cancelled on March 12th, understandably.

*I am worried that the proposed bluefish regulations miss the point for the following reasons: 1. Fishing mortality is only one of several adverse factors bluefish face. Others include shortage of forage, most notably squid but also herring and other species. In other words, bluefish are part of the marine ecosystem, and the **Sustainable Fisheries Act mandates an ecosystem approach to management**. That means addressing more than just fishing mortality. 2. In my extensive experience recreational anglers on the Cape and Islands release most of the bluefish they catch. Does the Marine Recreational Information Program (MRIP) have good information on this? If they do release most of their catch, will your proposed regulations have any effect at all? 3. Over the last few years it seems like there are two trends with bluefish, less fish in our fishery and on average the size is getting smaller. I would think we should try and help these small fish grow by creating a minimum size so these fish at least have a chance to reproduce before being harvested. **I expand on these and some other points in the rest of this comment.***

Like many, I am incredibly concerned with the status of the bluefish stocks. It is no secret that the two main species in our fishery are Stripers and Blues and we are seeing both on a decline. I am not writing this to point fingers as I know the people working for Mass DMF and ASMFC are good people, but their tools are limited. From what I understand, the **Sustainable Fisheries Act mandates an ecosystem approach to management, yet the only two tools I see used are bag limits and min/max size**. It is silly to think managing bluefish should be just about managing bluefish. The tools that are used to solve overfishing, makes it seem like we assume that the only pressure these fish are getting is from human impact (rod and reel), when in reality Stripers and Blues have less bait than they ever have and more predators (seals/sharks) than anytime in recent history. There is no doubt that the main bait source in the NorthEast for both fish are over pressured. Herring has been recognized as being on the decline and is only now being managed. As for squid, I understand coastwise squid stocks are fine, but localized depletion is taking place in Mass. It is commonly known that most of the fishing for longfin squid in the middle trimester is taking place just south of Nantucket and Martha's Vineyard. These commercial squid boats 10 years ago rarely fished off of Nantucket and their predominance over the last 10 years have severely affected the bait off the cape and islands which is a key piece of the puzzle for these fish, it is also known that the squid boats also have a lot of bycatch that includes bass/blues/seabass/herring/bunker as well as many others. These operators deserve to make a living and if stocks were healthy for Bass and Blues I would advocate that these operators can fish as they want, assuming regulators approve. In a perfectly balanced ecosystem I understand this fishing method, but when it is understood and documented that blues/bass are overfished, why is a contributor such as a non-discriminatory fishing method not being addressed?

I know I am miopic in looking at my local fishery, but it is no secret that RI/CAPE/ISLANDS is the **epicenter** of the Blue and Bass migration in the summer months. Fish are not getting the bait they are historically used to.

Over the last 10 years while we have seen a decrease in bait flow, we have also seen a large increase in competition for the bait that does exist. Competition exists not just amongst bass/blues, but also with the rise in the seal population. Fishermen are talking about it, but no government official is willing to recognize the impact that the seal population is having on bait. **So here is the question I would love to have answered: how much bait(in aggregate) do we need in our ecosystem to sustain a healthy striped bass/bluefish stock as well as the growing seal population? And how does that number compare to what we have in our system? Is our bait flow growing at a rate that it can sustain humans (commercial druggers), fish(optimistic healthy stock levels), seals (continued exponential growth with no management?)**

The solution being presented for increasing bluefish stocks is lowering bag limits from 10 fish per day to 3 fish per day. This is too easy an answer that doesn't solve any of the underlying problems. I don't have the data to prove my assumption, but I doubt less than 10% of recreational fishermen are keeping their bag limit, thus the one change being made will not have any effect. If I am wrong and there is data to prove me wrong, please let me know. I am equally as confident that the new proposed limits of 3 or 5 fish won't be utilized as well. From my twenty years, there is only one group that keeps more than one 1-2 fish per person and that is the party boat fishermen. I may be wrong, but I have had boots on the ground for 20+ years, which is a lot of data.... So the one tool we are using, frankly isn't relevant to solving the problem. This again is my thoughts and I don't have data to prove this, but leads me to ask the questions:

1. **Do MRIP Surveys suggest that fishermen keep their limit?**
2. **Assuming not, why is adjusting the bag limit the only solution on the table if it does not change anything?**

The data point that has been made very public though is that the average size of bluefish is decreasing. So why not use the other tool available to regulators which is to create a minimum size so small fish can get to reproduction age, just as we are doing with Striped Bass. We should also have a maximum size, so the large fish can reproduce safely.

So here is a summary of how we should be looking to solve the problem from one fishermen's opinion:

- Minimum/max size, just like Striped Bass. Let's use the tool in the toolkit that will solve a data driven problem.
- Adjust the bag limit to 1 fish per person per day. Get ahead of this problem, don't chase it.

- Make adjustments to those who catch blues and bass as bycatch so that all that impact it are fairly affected.
- Look at the amount of bait needed to sustain a healthy and hopefully growing fishery and answer the question. **Do we have enough bait today? Will we have enough bait tomorrow?**
- Be thoughtful about protecting bait at its source. Squid for example reproduce south of Nantucket and historically the squiddos are the prime food for blues through July/August. **Which leads to my suggestion, why just manage the fishermen targeting Blues/Bass, shouldn't those who fish for their bait and catch bass/blues as bycatch also be managed differently now recognizing the ecosystem approach? I don't want these people to stop squid fishing, but let's be thoughtful about where they fish so as to limit bycatch and protect the bottom.**
- Look very closely at the role that seals are playing in consuming bait that the bluefish/(other fish) want and **could management also look at studying and understanding what a healthy seal population is?** *It is sad and incredibly inconsistent that every other species that is "managed" is managed to a sustainable level and that there is no provision in the marine mammal protection act to properly assess stock status and/or declare a seals recovered.*

My name is Corey Gammill and I make my living working on the water. I spend 140 days on the water every year and I have for the last 20 years. I fish the waters around Nantucket and south of Martha's Vineyard and east of the cape. My log books can tell it all. We have less bait than we used to, we have less fish (blues/bass) than we used to, and the fish we do have are smaller and we have more big predators(seals/sharks) than ever before. Small adaptations in bag limits will not be enough, we must look at the vertical nature of our ecosystem and make some big changes.

**From:** [McKiernan, Dan \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Public Comment  
**Date:** Wednesday, March 18, 2020 12:57:06 PM

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**From:** david meservey <dmese@yahoo.com>  
**Sent:** Wednesday, March 18, 2020 12:56 PM  
**To:** McKiernan, Dan (FWE) <dan.mckiernan@mass.gov>  
**Subject:** Public Comment

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DMF,

Thank you for the opportunity to comment on the horseshoe crab and fluke proposals. I support the 75 crab limit to CAP permit holders. The LOA's was a decent program that helped crabs to market. But, as a horseshoe crab endorsed fishermen it didn't seem right for non-endorsed fishermen to retain any crabs at all. 50-75 crabs is a good number for incidental catch. With the fluke fishing being so poor in Nantucket Sound during the 2019 season the LOA fishery put a lot of unintended effort against the HSC.

On the other hand, I am against raising the daily catch to 400 pounds of fluke and being able to retain two days of catch. I feel as though the intention is good and it helps to ensure fulfilling the quota but, makes it more economical for larger boats and would have unintentional negative results. 300 pounds has historically worked. Thank you again for allowing me the opportunity to comment.

David Meservey

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

Dear Director McKiernan,

I'm writing to express my opposition to the proposal to open the Massachusetts commercial striped bass harvest earlier than June 23 and to share my overdue appreciation for your leadership at the February ASMFC meeting of the Atlantic Striped Bass Board.

I travelled to the February ASMFC meeting at my own expense. I am gravely concerned about the current state of the striped bass fishery and even more afraid of where we will be three years from now. I'm working to become more informed, more involved, and to bring others into this process. I appreciate and applaud your efforts at the striped bass board meeting to promote consistent regulations coastwide, to check some of the more irresponsible CE proposals from New Jersey and Maryland, and to lead the push against the New York proposal to allow their charter/party boat fleet to harvest fish 31" and greater. While I originally advocated for the option that would establish a 35" minimum size, I have supported the need for consistency in regulations coastwide. Thank you for speaking up for responsible management, both at the board meeting and in your letter to your counterpart in Rhode Island.

Now a resident of Maine, I fish frequently in Massachusetts waters, both recreationally and as a for-hire charterboat captain. Growing up on the water in Scituate, I first earned my Coast Guard license in 1986 and ran private and charter boats out of Boston for a number of summers. I started Gillies & Fallon Guide Service, LLC in 2004 in Phippsburg, ME but extend my season and market by traveling south to fish Boston Harbor to Martha's Vineyard, with the longest stint in the fall when I am on the Cape for September and most of October.

I am not opposed to the commercial harvest of striped bass. I live in a community that is centered around people who make their living on the water. I'm on the town committee that has just received permission to open a limited commercial river herring harvest in one of our ponds. I paid off my college tuition bills catching lobsters and tuna. I have kept my distance from advocacy organizations that have seemed more interested in resource allocation than overall well-being of the fishery. And while I understand the logic behind the argument that commercial striped bass anglers have an approved quota and thus should be allowed more opportunity to harvest that quota, I don't believe it would be a prudent management decision.

You and the Department of Marine Fisheries deserve credit for honoring the guidance of the ASMFC striped bass board and applying equal 18% reductions to the recreational and commercial harvest targets in the state, however, there are so many unknowns about the results of all changes brought about by Addendum VI that a more conservative approach is warranted. The failure of the Massachusetts commercial fleet to reach the harvest quota cap

the last two years adds further weight to the argument for an abundance of caution in management decisions. We have yet to hear back from the TC regarding their calculation of the projected cumulative mortality reduction as a result of Conservation Equivalency approaches from a number of states. Between New Jersey's bonus tag program and Rhode Island's potential 30" to 40" CE, we could be harvesting over a much wider slot than originally intended and the TC has been clear that predicting the effect of any slot limit on striped bass is challenging. Slot limits are an untested tool when it comes to management of this species. With no mechanism in place to hold states accountable for their results under CE proposals, we're at least two and likely three years away from any ASMFC changes to react to changes in the striped bass population. Commercial anglers might argue that what happens on the recreational side shouldn't in any way impact their portion of the fishery but I would suggest that we need to consider each and every management decision with respect to the overall health of the fishery and we'd be well served to remember that we've reached this point in part because Addendum V has failed.

Massachusetts could support and strengthen the commercial striped bass harvesters who make some significant portion of their income from commercial fishing interests with other regulatory changes. There is support in portions of the recreational and for-hire community for changes to the commercial harvest rules that would serve to limit participation and potentially raise prices, directing use to those fishermen who are most deserving of access to this limited and valuable resource.

Retaining the June 23<sup>rd</sup> opening of the commercial season sends a signal to all stakeholders that you and the Massachusetts DMF are committed to taking steps in the best interest of rebuilding this fishery. The significant decrease in commercial harvest landings in 2019 and 2018 are a message that should not ignore. I heard resounding approval of the previous decision to keep the open commercial harvest days at two when it was clear that we wouldn't reach the quota cap. My understanding is that the decision was based in part upon the volume of public comments opposed to adding the third day. That your organization listened to public input helps to keep people involved in the management process and every fishery benefits from greater stakeholder involvement.

Sincerely,

Capt. Peter Fallon  
Gillies & Fallon Guide Service, LLC

824 Main Rd  
Phippsburg, ME 04562  
[pfallon@mainestripers.com](mailto:pfallon@mainestripers.com)  
207-522-9900

March 13,2020

Dan McKiernan  
Acting Director, Mass Division of Marine Fisheries  
251 Causeway St., Suite 400  
Boston, MA 02114

Black Sea Bass

I would like the days of the week to stay the same with an increase to 200 lbs for anglers and 400 lbs for potters. Opening the season earlier would help fill the quota before the fish head off shore into federal waters.

Sincerely yours,  
Pete Kelly  
Permit #108255  
tautog [611@comcast.net](mailto:611@comcast.net)

March 13,2020

Dan McKiernan  
Acting Director, Mass Division of Marine Fisheries  
251 Causeway St., Suite 400  
Boston, MA 02114

Striped Bass

I would like to see the striped bass season start on June 1, 2020. This will help us fill the quota before the fish move off shore.

Sincerely yours,  
Pete Kelly  
Permit #108255  
[tautog\\_611@comcast.net](mailto:tautog_611@comcast.net)



March 13,2020

Dan McKiernan:  
Acting Director, Mass Division of Marine Fisheries  
251 Causeway St., Suite 400  
Boston, MA 02114

Fluke

1. Rod and reel fluke fisherman are against increasing the daily quota of fluke for draggers and rod and reel anglers. The landings of the few fluke anglers lack jumbo and select fish. These are the fish that produce the most eggs for spawning. After a couple of weeks, the draggers catch most of the larger fluke in Martha's Vineyard Sound waters leaving small and short fluke. The average fluke trip for anglers was 64 lbs in 2018 and even less in 2019. It makes no sense to increase it to 250 lbs.and 400 lbs. We compete for fluke in the same waters as the draggers and increasing their daily quotas would only add to killing our fishery sooner.
2. I suspect the huge amounts of black sea bass in Vineyard Sound make it hard for fluke to compete for food. Black sea bass are an extreme predator on steroids eating everything on the sea bed. If you went to a restaurant and there was a two hour wait to eat, you would go elsewhere to eat. Fluke also will go where the food is.
3. We petitioned the DMF and the MA marine fisheries commission in January for a 100 lb by-catch of black sea bass for fluke fisherman starting on June 10, 2020. This will have no impact on other fisherman as we are very few active endorsements. If draggers are allowed a 100lb by-catch it is only fair to give the fluke anglers the same by-catch.
4. The numbers of fluke fisherman are steadily declining and soon we will all be gone. We need this by-catch to survive. Storey Reed was kind enough to send us the attached DMF statistics on fluke landings by rod and reel. ( Please see the attached statistics).
5. My catch in 2017 was 2,752 lbs. In 2018, it dropped to 1,277 lbs.( Less than half.) In 2019, it went down to 1,226 lbs.
6. It should be in Massachusetts best interest to help all of our fisheries become sustainable and to catch our total allowable quota.

Sincerely yours,  
Pete Kelly  
Permit #108255  
tautog 611@comcast.net

YEAR	COUNT FLUKE ENDORSEMENTS ISSUED	# OF ACTIVE ENDORSEMENTS W/ ROD & REEL	AVG_LIVE_POUNDS FLUKE PER TRIP W/ ROD & REEL	ENDORSEMENTS LANDING >= 500 LBS FLUKE TOTAL FOR YR
2000	1346			
2001	1277			
2002	1210			
2003	1174			
2004	1130			
2005	1089			
2006	1030			
2007	984			
2008	955			
2009	927			
2010	900	186	106	76
2011	853	179	97	70
2012	823	154	115	76
2013	792	138	97	49
2014	771	103	65	21
2015	739	118	82	31
2016	721	116	90	43
2017	697	81	112	25
2018	674	73	64	14
2019	658	NA	NA	NA

**From:** [Prescott Clark](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Dean Clark](#)  
**Subject:** Proposed amendments to Division of Marine Fisheries regulations  
**Date:** Tuesday, March 17, 2020 7:50:23 PM

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Scott Clark  
47 Holden St.  
Shrewsbury, MA

02332

To: Acting Director McKiernan  
MA Division of Marine Fisheries  
Director McKiernan,

Striped bass is the most sought-after recreational sport fish on the Atlantic seaboard. The recovery and continued health and welfare of the species trumps my concerns as a fisherman. My summary overview is that we must prioritize the welfare of the fish ahead of the fishermen. Until we make this commitment we will never get off this regulated roller-coaster ride of species abundance/failure. We should not be wasting our collective time and energy on any proposed regulation that doesn't meet the "Fish First" criteria.

However, even though the current regulatory proposals do not measure up to the "Fish First" management protocol and because input from the public has been requested, I am submitting the following:

The rules re gaffs, slot limits, and circle hooks should apply to both recreational and commercial fishermen targeting stripers. The fish don't know or care if the fisherman holds a commercial or recreational permit and the consequences are the same either way so make the rules "universal": Yes on the slot limit, yes on prohibiting the use of gaffs, Yes on requiring the use of circle hooks when fishing with bait.

Every effort should be made to protect the larger fish (female breeders) as they are an absolute prerequisite to the recovery of this currently overfished species. Accordingly, I am suggesting that the 35" and over commercial harvesting requirement be replaced with the same slot limit required of recreational fishermen. I am against opening the commercial season earlier unless the slot limit will apply to everyone. Targeting breeder female bass is both counter-intuitive re. recovery and duplicitous from a competing sector perspective. It doesn't make any sense at all. A recovery won't happen or be able to be sustained unless we all support regulations that put the best interests of the fishery ahead of the selfish interests of fishermen. Toward that end I thank you for arguing at the ASMFC in favor of regulatory universality and against conservation equivalencies. Now, let's see what we can do to protect the breeder females by putting "Fish First".

Scott Clark

**From:** [Katherine Davis](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Public Comment for Regulation Changes for Spring 2020  
**Date:** Wednesday, March 18, 2020 3:51:08 PM

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Public Comment for Regulation Changes for Spring 2020

March 18, 2020

To Acting Director Daniel McKiernan:

I hope this email finds you well. Following are some of the comments and concerns we have regarding the regulations and proposed changes for the 2020 season.

First and foremost, we believe it is important to acknowledge that in the crisis of the Covid-19 pandemic the state and industry are entering into uncertain times and this crisis will undoubtedly have a dramatic impact upon the state of Massachusetts commercial and recreational fishing industries. In light of this crisis, while the state of Massachusetts remains in a 'State of Emergency' as so declared by Governor Charlie Baker, we would encourage DMF NOT to make any changes to the current fishing regulations. We do not know what the future holds for industry users, the tourist industry, the market capacities, and the slew of unforeseen factors we will encounter as we try to mitigate the impacts of Covid-19. New regulations, changes to catch limits, so on and so forth could result in further economic strain upon the industry and should not be made lightly.

We would also like to encourage DMF to consider coming up with special regulations in attempt to assist the fishing industry supporting our communities; we should be looking at ways the fishermen may be able to sell directly to the public while Massachusetts remains in a state of emergency. The public is afraid they won't have access to fresh food and fishermen are afraid they will go out of business. I would implore DMF to create a direct bridge between the fishermen and public during these uncertain times. Now is the time to develop special regulations that will allow the industry to help feed and support their communities, as fishermen have done for hundreds of years.

If the state does insist on altering the current regulations despite the threat from the Covid-19 crisis we would ask that the following statements be added as public comment.

Under the striped bass regulations; "Striped bass imported into the Commonwealth must be marked with a number tag that identifies the state of origin and must be accompanied by documents that verify state of origin." We would ask that when sold to the public, the state of origin be displayed in full public view and have a special designation as being an out of state waters product. With so much focus being put on purchasing locally sourced food and eating with the ecosystem movement, there should be full transparency of where the seafood sold locally was caught. This will help to promote locally caught product.

Under the recreational management measures for striped bass, the legal size of 28 inches we believe should be raised to at least 32 inches or maybe even making the limit the same size as the commercial limit of 35 inches. There is no need for anyone to be targeting small fish. IF the size limits for keepers is increased, this information should be used when gathering catch data; meaning if the harvest rates are lower the year the size limit are increased, the size increase should be factored in.

Under the 'Edible Crab Management' we believe this fishery should be an open permit endorsement not just limited to lobster permit holders.

Under the Summer Flounder Management, we do not believe there should be any changes at all in daily catch limits. We strongly disagree with holding over of any fish to land double limits. Fluke is a beautiful premium product; we should be looking to maintain a top price for a quality product and seek to avoid causing a glut in the market.

Under the Weir fishery section, we strongly disagree with the increase of black sea bass quota from 15,000 pounds to 24,000 pounds. IF the state is considering increasing catch limits, we would encourage the state to increase those limits to benefit as many state water fishermen as possible, not limit those benefits to one or two fishermen.

Under the Horseshoe Crab Management changes, we would strongly suggest the state DOES NOT allow the possession of 75 crabs to non-permit holders. This would allocate 25% of the quota over to non-permit holders. Unless the state is willing to compensate for that loss by allocating 25% of the quota from other fisheries such as groundfish to non-permit holders, it does not make sense to take away from those who hold the endorsement. Permit holders with horseshoe crab endorsement should not be forced to relinquish their rights to a quarter of the quota unless the state is willing to compensate them for this loss of income.

Thank you for your time and consideration,

Nathan and Katherine Davis  
Sarah Belle Fisheries Massachusetts CAP permit holder

Sent from [Mail](#) for Windows 10

**From:** [Nathan Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Letter to Mass Fisheries  
**Date:** Tuesday, March 17, 2020 4:11:05 PM

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Dear Dan McKiernan

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

**If this not a red flag warning of a fishery in trouble**, I do not know what is a better example. Also, we can see that overall fish mortality, in recreational and commercial striped bass, of fully-recruited fish has continued to spiral downward since 2012 which further leads to biomass loss. Additionally, we have not even touched on the striped bass by-catch mortality from trawlers off Massachusetts, or the effects of predation on striped bass, such as seals and sharks.

We cannot deny the effects of climate on striped bass as we have seen increasing issues in the spawning grounds, such as the Chesapeake Bay, with warming temperatures, algae blooms and reduced young of the year population. One can ask why the commercial fishermen did not meet their quota. The answer is clear and simple, they could not catch enough fish. Why? Because we have depleted them and they just do not exist. The larger fish have been previously caught and removed from the population and those larger fish are the big breeding females that produce more eggs and are the sustainers of the striped bass population.

I feel that we need to take several drastic measures.

- First- we need tackle restrictions, no treble hooks at all, circle hooks only on lures and live/cut bait. The goal is to do no harm to the fish that are caught. Have fun catching them but do no harm. (see photo)
- The current options proposed are not responsible enough to help the fishery. We need the most conservative approach.
  - THERE SHOULD BE NO SLOT LIMIT
  - The recommendation should be a total size limit of 40" for all anglers commercial and recreational – GOAL IS TO KEEP MORE FISH IN THE BIOMASS
- Additional we need to re-evaluate the data in 2021 and strongly consider is totally close this

fishery in all 13 states for both commercial and recreational striper fishing. They did this exact thing in the early 80's and it worked.

I am not forwarding such recommendations without offering to help. Please feel free to contact me to help in anyway, such as collect data, analyze data or help organize meetings, or whatever you need. The goal is to have a sustainable fishery for all anglers recreational and commercial alike, this is all of our responsibility. Massachusetts needs to lead the way.

Very Respectfully-

Nate Ryan  
[ryan\\_nathan23@mybps.me](mailto:ryan_nathan23@mybps.me)

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**From:** [Jack Skammels](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Opening of bass season  
**Date:** Friday, March 13, 2020 12:09:07 PM

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My name is John skammels I have two striped bass endorsements and I encourage the opening of striped bass season June 1st .I have been a commercial fisherman rod and reel for 50 years and I have seen Rhode Island open earlier than Mass many of years where they set the price and we have to wait for three weeks or more before we can fish. I would like to obtain a Rhode Island license but I have been unable to do so although Rhode Island residents can I obtain a Mass license easily .please go ahead with the June 1st opening thank you

Sent via the Samsung Galaxy S7 edge, an AT&T 4G LTE smartphone  
Get [Outlook for Android](#)



**From:** [Joseph Modry](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed striped bass regulations  
**Date:** Friday, March 13, 2020 1:18:05 PM

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Acting Director Daniel McKiernan:

I am writing to voice my opposition to MA increasing the commercial season length for striped bass during a time when the stock is in trouble and managers are supposed to be working on ways to save the stocks, not destroy them. I typically travel to the Cape multiple times during the summer, with friends, to enjoy striped bass fishing. While there we release every fish we catch and spend plenty of money on tackle, restaurants, tackle, and lodging. I will be watching the outcome of this decision carefully and will boycott fishing in your state, and encourage others to do the same, if you increase commercial harvest opportunity in times like these.

Sincerely, Jay Modry Greensboro, Vermont

---This message was sent by a Hazen Teacher---

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**From:** [Brendan Byrne](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020  
**Date:** Thursday, March 12, 2020 1:00:42 PM

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Please please please do not open the Striped Bass season early. We really need to see if the current measures will be effective especially with the inconsistent application of recommendations by state.

Thank you for your consideration.  
Brendan

Sent from my iPhone

**From:** [Fleming, Braden](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Massachusetts proposed Striped Bass regulations  
**Date:** Friday, March 13, 2020 7:18:12 AM

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Dear Acting Director Daniel McKiernan:

I am writing this letter to address my thoughts about the 2020 MA Striped Bass Regulation Proposals. I currently live in Sherborn MA and I've been striped bass fishing in MA and all of New England with a fly rod since 1990. Over the past few years there has been a notable decline in the quality and quantity of the fish that I catch and stricter regulations are needed. I am in agreement with the proposed slot limit. I strongly feel that the no gaff rule should be applied to commercial anglers. I also feel think that opening the commercial season before July 1st is a mistake as it will expose the large migratory breeder females to increased harvesting. Finally, I think it is important to require all commercial striped bass landings to be tagged at the point of capture and not at the point of sale.

Sincerely,

Braden Fleming

--

Braden C. Fleming  
19 Saddlebrook Rd  
Sherborn MA 01770  
PH: 401-316-4737

**From:** [rob.mitchell](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 regulation proposals  
**Date:** Thursday, March 12, 2020 6:58:07 PM

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I understand there is a sunset for replies next Monday. I recently moved to Plymouth with the intent of having fun with canal and surf casting for stripers. Obviously, last year was a struggle. I believe the folks at Stripers Forever are honest in their assessment of the proposed regulation changes and would ask that you give consideration to their recommendations. The only way for all of us (both sport and commercial fisherman) to succeed is to have a vibrant striper population!.

--

Regards,  
Rob Mitchell

**From:** [Dave Rimmer](#)  
**To:** [Fish, Marine \(FWE\)](#); [McKiernan, Dan \(FWE\)](#)  
**Subject:** 2020 Regulatory Proposals for Striped Bass and Bluefish  
**Date:** Friday, March 13, 2020 7:49:00 AM

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I would like to be on record for the following:

#### Striped Bass - Recreational

1. I support the 28-35" slot to limit to achieve the 18% reduction. However, I would have preferred to see both the recreational and commercial fisheries move to a 36" minimum limit together. I think this would result in greater reductions in mortality and simpler regulatory enforcement.
2. I support the mandatory use of circle hooks for bait fishing but I think the regulation should not have exceptions for any sectors of the fishery.
3. I support a ban on any landing device that punctures fish.

#### Striped Bass - Commercial

1. I oppose an earlier opening to the commercial season.
2. No opinion on have open commercial days change from Monday and Thursday to Monday and Wednesday, other than it seems the proposed change will make it easier for non-resident permit holders to travel to fishing areas and stay in the area to fish 2 out of 3 days. I thought the original reasoning for separating days was to make it less easy for this to happen.
3. I support increasing the minimum size to 35" but as I stated above, I think MA should adopt a statewide minimum limit of 36" for all fisheries.

#### Bluefish

1. I support a MA conforming with coastwise mandates for recreational bluefin harvest.

Thank you.

Capt. Dave Rimmer  
Joppa Charters  
57 Boston Road  
Newbury, MA 01951  
508.954.0169 c  
[daverimmer1960@gmail.com](mailto:daverimmer1960@gmail.com)

**From:** [Juro](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attention: Daniel McKiernan, regarding proposed regulatory changes  
**Date:** Thursday, March 12, 2020 12:36:24 PM

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Hello and thanks for taking feedback on this important matter.

It is obvious to all on the water that the striped bass stocks are in a troubled state right now, yet only the commercial proposals are directed toward helping them, There is a big gap between the large mature striped bass population and the undersized year classes that everyone has been experiencing firsthand - with the slot size missing until the schoolies mature down the road. Yet the proposal is to allow commercial access to the migrating post-spawn fish before they take residence. Makes no sense.

Also the fluke fishery is abysmal in MA for recs. This management approach is not balanced for the rec vs commercial and singularly favors the latter. We can barely find a legal fluke once the trawlers have come through.

1. Recreational Striped Bass (322 CMR 6.07).

All of these regulations seem to have a positive effect on the welfare of the fish, however, item "C" does not specify whether tools like bogagrip which cause internal damage from lifting the entire fish by the lip is invasively damaging, where it certainly is. Let's be clear about it.

Regulations should be coastwide not state by state.

3. Commercial Striped Bass (322 CMR 6.07).

A one-inch gap should be raised to 36" to provide a clearer differentiation. June 1st start will allow targeting of migrating fish verses those 'settled in' and will decimate schooled fish before they distribute into residence for the season.

4. Commercial Summer Flounder (322 CMR 6.22).

Fluke fishing has been just terrible in Massachusetts, fishermen have been needing to catch sometimes two dozen shorts to get one barely legal fish for dinner even with experienced rods. Once they drag the shoals it is over, by increasing trip limits without shortening something else it is the death knell for the rec fishery.

You are managing fluke for the benefit of the trawl fishery, no one else.

5. Commercial Black Sea Bass (322 CMR 6.28).

Similar situation to the fluke fishery but much more abundant - however the stocks are culled to small fish such that people catch very small fish all day and go home empty - while these tiny fish are on fish store shelves all the time. I am not aware of the size restrictions for commercial but they are not 15".

7. Commercial Menhaden (322 CMR 6.43, 7.01, 7.04 and 7.06).

This is finally starting to show signs of recovery - why mess with it?? This is a cornerstone species, not a target for exploitation - leave well enough be.

8. Sand Lance (322 CMR 6.42).

200 pounds for "traditional bait"? How about 100 pounds... that is about 300-400 bags of bait for a day's fishing.

**From:** [Ben Whalley](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attn: Acting Director Daniel McKiernan  
**Date:** Wednesday, March 11, 2020 9:27:25 PM

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Acting Director Daniel McKiernan

Massachusetts Division of Marine Fisheries

251 Causeway Street, Suite 400

Boston, MA 02114

Dear Director McKiernan,

I'm writing to express my opposition to the proposal to open the Massachusetts commercial striped bass harvest earlier than June 23 and to share my overdue appreciation for your leadership at the February ASMFC meeting of the Atlantic Striped Bass Board.

I am extremely concerned about the current state of the striped bass fishery and even more afraid of where we will be three years from now. I'm working to become more informed, more involved, and to bring others into this process.

I am a resident of Maine, however I fish frequently in Massachusetts waters. I am not opposed to the commercial harvest of striped bass. I live in a community that is centered around people who make their living on the water. paid off my college tuition bills catching lobsters. I have kept my distance from advocacy organizations that have seemed more interested in resource allocation than overall well-being of the fishery. And while I understand the logic behind the argument that commercial striped bass anglers have an approved quota and thus should be allowed more opportunity to harvest that quota, I don't believe it would be a prudent management decision.

You and the Department of Marine Fisheries deserve credit for honoring the guidance of the ASMFC striped bass board and applying equal 18% reductions to the recreational and commercial harvest targets in the state, however, there are so many unknowns about the results of all changes brought about by Addendum VI that a more conservative approach is warranted. The failure of the Massachusetts commercial fleet to reach the harvest quota cap the last two years adds further weight to the argument for an abundance of caution in management decisions. We have yet to hear back from the Technical Committee regarding their calculation of the projected cumulative mortality reduction as a result of Conservation Equivalency approaches from a number of states. Between New Jersey's bonus tag program and Rhode Island's potential 30" to 40" CE, we could be harvesting over a much wider slot than originally intended and the TC has been clear that predicting the effect of any slot limit on striped bass is challenging. Slot limits are an untested tool when it comes to management of this species. With no mechanism in place to hold states accountable for their results under CE proposals, we're at least two and likely three years away from any ASMFC changes to react to

changes in the striped bass population. Commercial anglers might argue that what happens on the recreational side shouldn't in any way impact their portion of the fishery but I would suggest that we need to consider each and every management decision with respect to the overall health of the fishery and we'd be well served to remember that we've reached this point in part because Addendum V has failed.

Massachusetts could support and strengthen the commercial striped bass harvesters who make some significant portion of their income from commercial fishing interests with other regulatory changes. There is support in portions of the recreational and for-hire community for changes to the commercial harvest rules that would serve to limit participation and potentially raise prices, directing use to those fishermen who are most deserving of access to this limited and valuable resource.

Retaining the June 23rd opening of the commercial season sends a signal to all stakeholders that you and the Massachusetts DMF are committed to taking steps in the best interest of rebuilding this fishery. The measurable decrease in commercial harvest landings in 2019 and 2018 are a message that should not be ignored. I heard resounding approval of your organization's 2019 decision to keep the open commercial harvest days at two when it was clear that we wouldn't reach the quota cap. My understanding is that the decision was based in part upon the volume of public comments opposed to adding the third day. Your organization listened to public input last year and I hope will do the same this year.

Respectfully,

Ben Whalley

Registered Maine Guide

207-274-8782



**From:** [George Driscoll](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attn: Dan McKiernan  
**Date:** Wednesday, March 11, 2020 6:11:16 PM

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3/11/20

I am unable to attend tomorrow's meeting at Mass Maritime, but wanted to go on record with my input.

While I applaud the efforts of DMF to manage and regulate our fisheries, I fear that none of the proposed regulation changes, commercial or recreational, will have the desired outcome without including a program to deal with the gray seal population. These apex predators have no regard for size or bag limits, and their numbers increase exponentially each year. While I have no science to support my opinion, I certainly have no lack of anecdotal evidence, as does anyone who fishes every day on the Outer Cape. Customers on the boat I run, and on virtually all other boats, lose fish (and tackle) to seals on every trip. While I realize these fish on the line are easier targets for seals, countless other fish are undoubtedly being consumed as well. The readings I have done on the subject all agree that these seals eat between 5 and 20 percent of their body weight in fish each day. Multiply that number by the many 10's of thousands of seals in our waters (let's say conservatively at an average of 400 lbs per animal), and the impact on local fish populations (native and migratory) is staggering. I've read and heard that seals mainly target sand eels and bait fish. They also target to a very large extent striped bass and bluefish, a readily observable fact.

People who favor eliminating the commercial striped bass fishery and even the recreational taking of bass inevitably reference the success of the moratorium of the "80s". What most of those same people don't realize is that that moratorium not only applied to rod and reel fishermen, who took fish 1 at a time, but to gill netters and purse seiners, who took fish many tons at a time. When the moratorium was lifted it was only for rod and reel fishermen. After that lifting, the spectacular recovery continued until around 2010, letting rod and reel fishermen off the hook, so to speak. Since then, there has been an inverse relationship between the bass and seal numbers in our waters. The same can be said of bluefish and seals. Remember, there were no seals around to factor into the moratorium.

I know you are concerned about the release mortality rate, particularly for the recreational fishery. Well, I think it's true that any fish released is in a weakened state, even when handled and put back perfectly. That fish is most definitely in extra jeopardy from seals while it catches it's breath.

Circle hooks, size slots, quota cut, lip clamps, netting rather than gaffing, all good ideas; all window dressing without acknowledging and addressing the major threat to our fish.

Capt. George M. Driscoll

**From:** [John Torosian](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** attn: Daniel McKiernan  
**Date:** Thursday, March 12, 2020 10:23:41 AM

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Mr. McKiernan

I am writing in regards to proposed changes to the commercial striped bass fishery. I am 34 years old and have been active in this fishery since i was a kid going with my dad. First let me say that i believe the striped bass stock is healthy. I am on the water 4 to 7 days per week from april to december. I fish the northshore area from the merrimack river to boston. I observed plentiful numbers of bass all season including large schools of bass over 40" in length and also an incredible amount of bass between 18-26". Many of these fish remain far offshore for most of the season as was discovered by recent satellite tagging studies done by the fisherman magazine and gray fishtag research. I feel that all these new regulations are the result of vocal unsuccessful recreational fisherman who spend very little time on the water and blame commercial fisherman for everything. Many of the complaints i hear are from shore fisherman. Perhaps just like every other fish in the north atlantic there range has shifted in recent years. I believe that the commercial regulations should stay the same as they were last year. Raising the size limit is only going to make it harder and lowering it is a worse idea and opening the season earlier will not make much of a difference. We need more fishing days so the active fisherman can utilize the quota.

Thank you

John Torosian permit # 176042

**From:** [Rich Nealley](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Black sea bass  
**Date:** Thursday, March 12, 2020 11:14:39 AM

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Hello,

In reading the daily limits on sea bass i found one area that needs more detail. The proposal reads that no one can possess or LAND more than five sea bass. The word "LAND" indicates that once you catch 5 fish you have reached your daily limit whether they are legal or not. This needs better explanation. As written a fisherman can only "catch" five per day. Point of fact! While fishing it may take catching and releasing 20 or more fish before getting 5 legal size fish.

Thank you,

Richard Nealley

Nashua, NH

Sent from my iPhone

**From:** [Michael Spall](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** comment  
**Date:** Thursday, March 12, 2020 11:18:35 AM

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Good Morning,

I am not sure if this is the correct place to send comments regarding the upcoming meetings on fishing regulations. I am a recreational fisherman. I do not see how the commercial size limit for summer fluke can be 14" while the recreational size limit is 17". With such a large disparity, the commercial boats just drag the shoals of Vineyard Sound and there is nothing left for the recreational fisherman to keep. Last summer I caught 1 legal out of about every 10-15 fish. Even with circle hooks, a good number of the undersized fish will die. I just quit fishing for fluke because it was not worth it. You have essentially eliminated the recreational fishery.

--

Michael Spall  
Senior Scientist  
Department of Physical Oceanography

MS #21  
Woods Hole Oceanographic Institution  
360 Woods Hole Road  
Woods Hole, MA 02543

508-289-3342  
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**From:** [rmjtag@aol.com](mailto:rmjtag@aol.com)  
**To:** [Fish, Marine \(FWE\)](#); [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Bass start date  
**Date:** Thursday, March 12, 2020 8:55:29 PM

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To whom it may concern,

I have been fishing Massachusetts waters for striped bass for over 30 years and without a doubt, the population is in decline. I applaud any efforts to enact conservation measures for both recreational and commercial fisherman.

I 110% vigorously oppose opening commercial bass fishing on June 1st. The commercial quota has not been met for the past couple of seasons because the population is in trouble. The migration is in full swing from mid May into June and I cannot see any good reason to allow the commercial fleet to be able to hammer these local populations of fish during this critical timeframe. Besides that, commercial days are an absolute circus at the boat ramps and on the water. It is intolerable.

Massachusetts is criticizing and pressuring RI to fall in line with some of the proposed regional measures but they are skeptical of our motives because of this proposal to open commercial fishing early. Please **DO NOT OPEN COMMERCIAL SEASON** early.

Thank you,

Rob Tartaglia  
Wrentham

**From:** [Michael Kowaleski](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass regulations  
**Date:** Thursday, March 12, 2020 11:55:33 AM

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Dear Division of Marine Fisheries,

I have been an active, commercial bass fisherman for 20+ years.

I am in full support of measures to reduce fishing mortality in order to stabilize and conserve the stock.

We have been unable to fill our commercial quota for the last 2 years.

Recent data clearly demonstrates that recreational fishing is responsible for over 90% of the fish landed or mortality related to release.

As such we need to take measures, as you have to reduce mortality related to recreational fishing. More can be done. Why not require circle hooks for charter boats? The captains may be experienced, but the anglers are not, and that is where the mortality comes from.

In addition, sensible reductions in commercial landings are reasonable.

Given the current state of the fishery, I feel that increasing the minimum size from 34" to 35" would drastically reduce the harvest.

Many of the fish landed in the last 2 years by myself and other commercial fisherman that I know are in the 34-35" size class. Increasing the minimum size to 35" would eliminate these from harvest. They would be returned to the sea, and some percentage would be lost to release related mortality, and this benefits no one.

The current regulation requiring pectoral fin removal on non-fishing days should help prevent commercial fisherman from stock piling. Creating a recreational slot limit of 28' - 34" and a commercial limit of 35" and over will not be any more effective than removing the pectoral fin.

Those that cheat, will still cheat, and keep 35" fish on noncommercial days, and stock pile them to sell later in the week.

The solution to this is enforcement, which I can honestly say is woefully lacking. Stockpiling is occurring on a daily basis by charter boats and others whose boats are kept at dock and rarely inspected. Small fish are gaffed and killed. We desperately need enforcement on the water.

In my view the sensible measures are to keep the minimum commercial size at 34". If necessary one could also consider reducing the total limit to 10 fish. That is reasonable to pay for fuel and expenses for most fishermen.

Creating a commercial slot limit of 34" to 40" is also another option to help reduce mortality in large breeding females.

I would be glad to discuss further at any time.

Best regards,

Mike

Michael P. Kowaleski, DVM, Diplomate ACVS and ECVS  
Professor of Orthopedic Surgery  
Tufts Cummings School of Veterinary Medicine



200 Westboro Road  
North Grafton, MA 01536

[mike.kowaleski@tufts.edu](mailto:mike.kowaleski@tufts.edu)

**From:** [Will Pinkus](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial striped bass regulations  
**Date:** Wednesday, March 11, 2020 12:13:58 PM

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Good afternoon,

I am writing you due to the proposal that would increase the length of the MA commercial striped bass season. As an avid angler for the past 30 years, I have witnessed the decline of our fisheries first hand. First cod and herring amongst many others now striped bass and bluefish. Recently in addition to a decline in the striped bass fishery I have also witnessed a dramatic increase in the popularity of recreational fishing. These factors alone are reason enough to shorten and strengthen regulations. I have also noticed that several organizations conduct much more extensive research to collect the most accurate representation of the status of our fisheries in Massachusetts and along the east coast where these fish migrate. Extending a season due to shortfalls in commercial quotas is not only uneducated, it's an irresponsible act when responsible for protecting our fisheries. Massachusetts has had a long line of poor decisions that have negatively affected a number of species in our waters. It's time for The state to step up and take the lead in conserving these species by not only declining the extension of the commercial season, but taking additional proactive measures to restore our fisheries to what they once were. Thank you for your valuable time.

Tight lines,  
Will Pinkus

**From:** [Peter Readel](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass season  
**Date:** Wednesday, March 11, 2020 3:27:34 PM

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The obvious reason that the Commercial Landings of Striped Bass in Massachusetts have not reached 100% of quota over the past two seasons is that the biomass of Striped Bass is in dangerously low quantities. Increasing the length of season is exactly the WRONG way to allow regeneration of that biomass! If there is to be a change the SEASON SHOULD BE SHORTER, Quota's reduced and a true test for qualification as a Commercial Harvester developed! Please Coordinate with neighboring states and establish the same Commercial Seasonal dates and length limits.

Thank you for hearing my views.

Peter Readel  
petereadel@gmail.com

Sent from my iPad

**From:** [Joshua Pennie](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial striped bass starting date  
**Date:** Wednesday, March 11, 2020 12:51:21 PM

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Please let the fish get to their spawning grounds and do not move the commercial fishing starting date earlier in the month. PLEASE!

**From:** [dean machado](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Daniel Mckiernan  
**Date:** Wednesday, March 11, 2020 4:26:09 PM

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Hi I'm a Rec angler that practices safe catch and release.. I'm concerned about the state of the striped bass fishery and want more conservative management measures, not less. I'm opposed to the one fish at 28-35" and would rather see a one fish at 39"..I'm also opposed to adding days to the commercial striped bass season. Also opposed to starting the season early..I feel these fish are much more valuable alive than dead.. Please consider my comments and hopefully the right decisions are made..

Dean Machado

Sent from my iPhone

**From:** [Mike Delzingo](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Daniel McKiernan: comments on Winter 2020 Marine Fisheries Public Hearing Notice  
**Date:** Wednesday, March 11, 2020 3:50:34 PM

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#### Article 1, Recreational Striped Bass (322 CMR 6.07)

section a

"Adopt a slot limit of at least 28" to less than 35"

I disagree with this ruling,

Although I understand other states are following this slot limit and this is most likely what will be enforced, I do not see this lowering the the harvest of the recreational community, as this is the exact targeted size class of fish they are after. This will also serve to eliminate many tournaments in Massachusetts as well as deny the recreational angler that trophy fish of a lifetime. I recommend a trophy tag to accompany this slot limit for certain occasions.

Section b.

expand the state's existing circle hook rule to potentially require all anglers whether fishing from shore, a private vessel or a for-hire vessel to use circle hooks

I disagree with this proposal.

Charter boats should be exempt from this rule. Professional Captains and crews are not inexperienced at targeting certain size class of fish using other hooks. No Captain wants a bloody mess of a fish on board with their clients looking on, or to kill fish unnecessarily.

This rule should pertain to the shore based chunk angler only.

Also how is the boat based angler supposed to target flounder, or other species, if he already has a bass on board? He would be out of compliance using anything other then circle hooks.

Section c.

Prohibit recreational anglers from removing striped bass from the water with any device other than a non-lethal device

I agree with this rule.

Although the Boca and lip-grip type devices should also be banned from use on fish intended to be released.

#### Article 2. Recreational Bluefish (322 CMR 6.18)

I agree with this decision.

#### Article 3. Commercial Striped Bass (322 CMR 6.07)

section A.

Move the start of the commercial fishery from June 23 to as early as June 1.

I agree with this proposal.

We have a healthy population of commercial size fish within reach in Massachusetts bay in early June and this will give the fleet a chance to land those fish. These are not the ONLY schools fish to migrate. only the first.

Section B

Adjust the open commercial fishing days from Mondays and Thursdays to Mondays and Wednesdays.

I disagree with this proposal.

The state should not be moving the days to accommodate the boats south of the cape and their black seabass fishery. We do not have the luxury of that fishery north of the cape and moving the days even CLOSER together will harm the guys north of the cape. These commercial size fish are not just sitting in a certain spot waiting to be harvested on any given day. These fish are constantly on the move. They have to be found and followed and contrary to popular belief, they do not all stay together in one spot day after day, just waiting to be caught., Adding an additional non fishing day back-to back-to back-to back will make it even harder to harvest the quota.

Section C. Increase the minimum size from 34" to 35".

I disagree with this proposal. The Charter fleet has a history of being able to sell commercial fish on charters and this proposal will completely eliminate that. This will be yet another TAKE from the commercial fleet who also hold charter permits.

Commercial size limits should mirror recreational limits and if the slot limit is imposed for recreational, it should also be implemented for commercial.

The Massachusetts commercial bass quota is being micro managed into failure. The past two seasons are proof positive of that fact.

Commercial bass fishermen are being forced to jump through hoops of closed days around holidays where the Boston fleet can't fish because of parking lot congestion concerns on the cape. A shortened fishing week without the five fish Sundays, making it even harder to fish this open access fishery for captains who have other day jobs.

Not being able to hold fish overnight Sundays means you have just about eliminated the nighttime bass fishery, because you can't sell your fish after 8pm in Boston and you can't be in possession after midnight. Guys are being forced to stop fishing early to make the buyers truck, or make it to the fish pier before closure.

The commercial fleet is diverse and not just trailer boats from the cape, and they are not just fishing race point and off Nausett. There are many larger boats, in slips and are restricted to fish in their local areas. You cannot choose days and seasons in advance and simply hope the fish are there on the days you have selected. (see 2018 & 2019)

How can we be expected to land the quota under these ever increasingly stringent regulations.

The striped bass fishery is ever changing with fish moving away from the hoards of seal on the Cape, and now the ever increasing Great white shark population.

It's time the state accept input from fishermen who do not live on cape cod, do not trailer to chase the bite, are limited to fish when the fish are actually available, and have full time day jobs.

This is not a restricted access fishery, but you sure are making it harder to fish.

Also, taking public comment from recreational anglers on commercial fishing proposals is a huge conflict of interest and surely heavily weighted against the commercial fisherman.

The majority of recreational anglers are bitter and spiteful towards the commercial fleet and would like nothing better than to see the continued failure to land the quota, Using that as ammunition in further attempts to eliminate the fishery all together.

Captain Mike Delzingo  
Boston, Ma.





**From:** [Andy Boynton](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Feedback on proposed fishing proposals/striped bass  
**Date:** Thursday, March 12, 2020 5:13:21 PM

---

Dear Daniel,

I am an avid fisherman and a senior administrator at Boston College. The economic and positive impact that striped bass fishing has on the Commonwealth (and beyond) is immense. My feedback follows, and I thank you in advance for your consideration.

1. Both recreational and commercial anglers ought to be subject to **the same rules regarding the use of circle hooks**. [*J hooks kill no matter who is using them*]
2. **The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers**. [*same reasoning as above*]
3. **Opening the commercial striped bass season before July 1 is wrong and seriously misguided, and shortsighted**. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to **Monday and Wednesday is wrong, and bad business**. [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. **The proposed slot limit is acceptable** [*the 18% harvest reduction is necessary*]

**And although it is not being considered in the proposed 2020 regulations it ought to be required that all commercial striped bass landings be tagged at the point of capture and not point of sale as it is now. We need to think ahead.** Current regs are a tacit endorsement of the rampant illegal black market in stripers. Thank you again for your consideration and help.

Andy Boynton

--

Andy Boynton  
John and Linda Powers Family Dean  
Carroll School of Management  
Boston College  
140 Commonwealth Avenue  
Chestnut Hill, MA 02467

[boyntona@bc.edu](mailto:boyntona@bc.edu)  
617-552-8420 (p)  
617-552-8738 (f)

**From:** [Harry Scott](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Fwd: Tonight's (March 12th) Public Hearing to Continue as Scheduled  
**Date:** Thursday, March 12, 2020 10:43:01 AM

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Dear Acting Director Daniel McKiernan,

As a recreational saltwater fisherman, I am concerned and dismayed at the lack of consistent regulations for Atlantic striped bass limits especially. Specifically, while we here in Massachusetts are being held to a high standard, including the proposed slot limits of 28-34", the Chesapeake Bay (CB) commercial fishing industry is wiping out the stocks by allowing them to take from the "CB and Rivers: 1,471,888 lbs. (part of Baywide quota)" from Maryland waters and another 1,064,997 lbs in Virginia waters of 18" minimum size fish

(see [https://dnr.maryland.gov/fisheries/Documents/Reg\\_Changes/DNR-FS-2020-03\\_Striped%20Bass%20Summer%20and%20Fall\\_Small%20Business%20Compliance%20Guide.pdf](https://dnr.maryland.gov/fisheries/Documents/Reg_Changes/DNR-FS-2020-03_Striped%20Bass%20Summer%20and%20Fall_Small%20Business%20Compliance%20Guide.pdf)).

How can we ever have our stocks ever return to reasonable levels when the juvenile stock populations are being decimated down south?

I urge you to fight for consistent size limits throughout the Atlantic fishery and to have the Atlantic States Marine Fisheries Commission curb the CB depletion of the Atlantic striped bass juvenile stock populations. Both our commercial and recreational fishermen deserve to be on equal footing so please help curb their limits and allow the Massachusetts stock to have a chance to rebuild.

While I am angered at what is happening in the Chesapeake Bay with regards to their Atlantic striped bass commercial harvests, I do urge you to consider their hook recommendations for Atlantic striped bass including restriction to use of only non-offset circle hooks when live-lining or chumming and no treble hooks when bait fishing. In my experience, treble hooks cause more fish fatalities than they are worth.

Thank you for your consideration.

Harry Scott, Duxbury, MA

----- Forwarded message -----

From: **MA Division of Marine Fisheries** <[marine.fish@public.govdelivery.com](mailto:marine.fish@public.govdelivery.com)>

Date: Thu, Mar 12, 2020 at 10:03 AM

Subject: Tonight's (March 12th) Public Hearing to Continue as Scheduled

To: <[hscott1959@gmail.com](mailto:hscott1959@gmail.com)>

Having trouble viewing this email? [View it as a Web page.](#)

## Commercial Fishing Advisory Image



March 12, 2020

DMF will hold tonight's (March 12<sup>th</sup>) public hearing at Mass Maritime Academy's Admiral's Hall, as scheduled, to discuss proposed regulatory changes for striped bass, bluefish, black sea bass, fluke, and more.

**March 12, 2020  
6 PM  
MA Maritime Academy  
Admiral's Hall  
101 Academy Drive  
Buzzards Bay, MA**

In lieu of attending in person, interested parties can review the proposals and a detailed version of the public hearing presentation on our [website](#). We are accepting written public comment until 5 PM on March 16. Please contact our Boston office if you have any clarification questions regarding the online material.

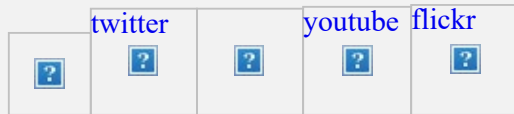
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## Massachusetts Division of Marine Fisheries

251 Causeway Street, Suite 400, Boston, MA 02114

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Commonwealth of Massachusetts  
Division of Marine Fisheries  
251 Causeway Street, Suite 400  
Boston, MA 02114  
[Marine.fish@mass.gov](mailto:Marine.fish@mass.gov)

Douglas E. Sylvia  
318 Rock O Dundee Road  
Dartmouth, MA 02748  
License No. 017708

March 11, 2020

Dear Acting Director Daniel McKiernan,

I am a long term, active, Commercial Black Sea Bass fisherman and I wanted to inform you that I believe that the Commonwealth of Massachusetts Division of Marine Fisheries did a great job when it obtained input from Commercial Fisherman and devised its proposal for regulatory changes to the Commercial Black Sea Bass Fishery. The Division appears to have accepted the input from Commercial Fisherman and to have steered away from either Friday or Saturday being open fishing days, because there are no auctions at Fulton Market on Saturdays or Sundays and, therefore, no transport of fish to New York on Friday or Saturday nights. Massachusetts needs to continue to supply the freshest possible Black Sea Bass to one of the world's largest fish auctions.

The only other comment I have upon proposal 5.a. of the Winter 2020 Marine Fisheries Public Hearing Notice, is that the proposal for changes which is "DMF's preference", whereby the existing season and open fishing days schedule is maintained, is also my preference. The Black Sea Bass commercial fishery is a small boat fishery and days will be lost during the season due to bad weather. There must be three days per week open to fishing, in order that there be at least two days during the week when the weather is good enough to fish. If fishing is open only two days per week and one of them falls on a bad weather day, the Commercial Sea Bass fisherman will loose 50% of his income for the week. This would be an unfortunate result. Also, when it comes to trap

fisherman, the Black Sea Bass need to be removed from the traps in an acceptable amount of time to preserve their quality. Having Sea Bass remain in the traps for a large number of days before their removal will lead to poorer quality fish and lower prices. We need at least three days per week to fish.

Thank you for your attention to these important matters.

Yours Truly,  
Douglas E. Sylvia

**From:** [Jason Whalen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Mass commercial fishing liscense (striped bass)  
**Date:** Thursday, March 12, 2020 11:27:13 AM

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Good afternoon,

I have sent in the form to RENEW my commercial permit about 2-3 weeks ago under the name Jason Whalen. My check hasn't been deposited nor have I heard back as to whether or not my application has been received. Is there anyway for you to let me know? Thank you.

Sincerely,  
Jason Whalen

4/C Jason Whalen  
International Maritime Business  
Massachusetts Maritime Academy

Sent from my iPhone

**From:** [Dan Beetz](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Mass. striper harvest  
**Date:** Thursday, March 12, 2020 4:59:36 PM

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For years I fished a Martha's Vineyard charter..nice guy...usually sold fresh tuna onboard he'd caught the night before. He had a no-fish, no pay policy and with five people fishing how could you miss? The last three years we've begun to miss in July. He would always remark how, during the commercial season, he had killed cow bass. Did he feel that killing the spawning stock had any effect? Nope. The fish had just moved north during the same week when they were once common. Well, we've moved north too, to New Hampshire, where the fishing is still not its former self. No blues either. This could be a temporary phenomenon, but logic says killing the spawning stock, like bass and cod means killing the fishery. I know, "Jobs, jobs, jobs," but do you have to kill the last fish in the sea to make a buck? I want to take my grandchildren on a charter with me. Doesn't look like a good time, and we don't kill fish. That's a lost job.



**From:** [Tom Fricker](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** meeting  
**Date:** Thursday, March 12, 2020 2:13:56 PM

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Irresponsible to have meeting. Our govt should be setting an example not shrugging this off.  
Shame!

Thanks, Tom

**From:** [priscilla](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Menhaden Fishery Comments  
**Date:** Wednesday, March 11, 2020 7:36:13 PM

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I am concerned about the changes being considered to the menhaden fishery.

I am a life-long Gloucester second generation fisherman.

After drafting a business plan, and moving forward with it, I acquired equipment and got backing, I am faced with the changes in the regulations to cause me to loose what I have achieved.

Particularly disturbing is the control date of May 1st, which leaves me no chance to qualify and keep my permit viable.

I don't expect to be fully equipped at that time, neither do I expect the menhaden to be migrated to my area by that time.

A May 1st control date will leave a handful of people to monopolize the industry.

Allowing these few permit holders sole access will make for a short season no matter what the quota is.

Most of the bait that is caught here in the early season will be trucked to Maine (and other states) because local lobster men can't consume the large quantity landed at once.

The local lobstermen, are then forced to buy it from out of state dealers, latter in the season at a premium price.

The bigger operations will fish hard in Massachusetts, will catch the Massachusetts quota, and then move on to another state to fish,

In one case, I know of a permit holder whose intentions are to catch the quota here then move on to a state that he has a individual quota leaving the local lobster men with a shortage of bait after they leave. In this case he is entertaining offers to buy his business by out of state company's.

Keeping the industry in Massachusetts will employ more people and keep the revenue in state.

To remedy this problem, lowering the catch limits and allowing more permit holders in the industry to fish a longer season, in turn providing lobster bait for a longer season.

Thank you,

Charles Parisi  
192 South St,  
Rockport Mass.

**From:** [Tom Kelly](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** New striper regulation  
**Date:** Thursday, March 12, 2020 5:33:00 PM

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Commercial and recreational fishermen should be governed by the same rules . Circle hooks should be used by everyone , the use of gaffs should be banned for everyone . A BIG NO on opening the commercial season early.

Sent from my iPhone

**From:** [Surdel, Dave](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** please do not extend the commercial striped bass season  
**Date:** Thursday, March 12, 2020 11:07:02 AM

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To whom it may concern,

I saw a notice online that Mass is considering moving the commercial season start up to June 1<sup>st</sup>. PLEASE DO NOT DO THAT! The reason the commercial sector is unable to make quota is because the striped bass are being pounded into extinction by all sectors. The idea that Mass would pander to a very small special interest group (many of whom are out of state) at the expense of the general public is crazy. The 'recremercial' commercial fishery for striped bass in Mass is a joke and everybody knows it. It's a huge problem that leads to overcrowding at the canal and the boat ramps. These are state-funded resources that should not be ruined by the greedy few, many of whom do not pay mass taxes. It also encourages poaching, which is rampant due to weak enforcement.

Mismanagement of the striper stocks by Mass and the ASMFC are the reason we have seen a decline in the striped bass population. Extending the bounty season on the few breeder-size striped bass that remain could be the last nail in the coffin. Mass needs to take a leadership position of conservation and back up the claims they make on the license plates for sale. Continuing to slaughter the dwindling population of adult fish sends the wrong message. It's clear at that point that Mass and the ASMFC have not learned their lessons from the last time they drove the bass population to the brink.

We are on a collision course once again and the conservation steps that have been taken coast-wide are inadequate. The resource-grab attitude by the individual states is sickening. Every year I see tourism decline on cape cod, recreational charters go under and tackle stores go out of business. There is little to no enforcement on the water or at the ramps. If Massachusetts really wants to 'conserve striped bass', they will implement a moratorium and create strict-no kill rules for all sectors (including the charter fleet). They will institute heavy penalties for poachers and increase enforcement on the water and at the boat ramps.

Extending the slaughter season is not the answer and contradicts the edict of 'saving the striper'. Please do the right thing and stop this madness before it's too late.

Dave Surdel  
6 Bayberry Road  
Acton, MA

**From:** [BILL HALLMAN 215 512 9314](mailto:BILL.HALLMAN@215.512.9314)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Please Help to save our Striped Bass  
**Date:** Friday, March 13, 2020 10:08:17 AM

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We strongly urge you to send in your thoughts **IN YOUR OWN WORDS AND ORDER** regarding the 2020 striper proposals and please, **DO IT NOW!**

We know that when emails appear to be from the “same source” they are either discounted or not counted at all so please make the email “your own”...and each voice does matter. Thanks!

Our thoughts on the proposed regulation changes:

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [*J hooks kill no matter who is using them*]
2. The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season before July 1 is wrong. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. The proposed slot limit is acceptable [*the 18% harvest reduction is necessary*]

And although it is not being considered in the proposed 2020 regulations it ought to be required that all commercial striped bass landings be tagged at point of capture and not point of sale as it is now. Current regs are a tacit endorsement of the rampant illegal black market in stripers.

Additionally, requiring that the entire commercial quota consist of large breeder females is counter productive to the attempted recovery of the species.

**From:** [Zachary Whitener](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment on 322 CMR 6.07, 322 CMR 6.18, and 322 CMR 6.07  
**Date:** Wednesday, March 11, 2020 12:31:39 PM

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Good afternoon,

I am writing to provide comment on proposed rules 322 CMR 6.07, 322 CMR 6.18, and 322 CMR 6.07. I a recreational fisherman in Maine and Massachusetts, as well as a fishing guide in Maine who targets striped bass. I am concerned about the status of the striped bass and bluefish fisheries.

I support the proposed slot limit 28-35" in 322 CMR 6.07 for recreational striped bass as it would contribute to the consistency of regulations along the whole East Coast migration.

We have not had any appreciable numbers of bluefish in southern Maine for many years and it is well known that on their way to Maine in the summer bluefish must pass through Massachusetts. I support limiting the daily limits to 3 fish for both shore/private boat fishermen and 3 fish for fishermen on for-hire boats. There is no good argument for having different regulations within the recreational sector; just because some can afford to go with a guide it doesn't mean that they should also be rewarded with a higher bag limit.

I am against the proposed change of the start of the commercial bass season proposed in 322 CMR 6.07. Just like bluefish, bass must pass your shores before they can get to Maine--by starting the season earlier, fewer big fish (that we will catch-and-release with out new slot limit) will come to the coast of Maine. The quota for commercial bass isn't being filled because there are not enough fish, not because there aren't enough opportunities to catch them.

Thank you for you time,

Zach Whitener  
Anadromous Adventures Guide Service LLC

**From:** [Vincent Catalano](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment regarding striped bass  
**Date:** Thursday, March 12, 2020 5:34:15 PM

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Acting Director Daniel McKiernan,

As a full time fishing guide in the northeast raising a family with two kids and seeing where we are at with the striper fishing at this point in time i urge and beg you to make conservation minded decisions we owe to the fisherman and most importantly the fish... This includes

ALL CIRCLE HOOKS COMMERCIAL & RECREATIONAL

NO GAFF FOR COMMERCIAL & RECREATIONAL

NO EARLY COMMERCIAL STRIPED BASS BEFORE 7/1  
" its killing the big fish were all trying to save with the new regs"

THE PROPOSED SLOT TO TRY AND GET THE 18% REDUCTION

Please do the right thing, Thank you for your time...

Best,

--

Capt Vinny Catalano  
631-766-1695  
[www.longislandflyfishing.com](http://www.longislandflyfishing.com)  
[www.joeyccharters.blogspot.com](http://www.joeyccharters.blogspot.com)  
IG : @JCCHARTERS

**From:** [Edward Purcell](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Ferguson, Kimberly - Rep \(HOU\)](#); [Gobi, Anne \(SEN\)](#)  
**Subject:** Public Comment Striped Bass  
**Date:** Friday, March 13, 2020 11:42:52 AM

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Dear Commissioner McKiernan,

I applaud the canceling of last night's hearing meeting in light of the health crisis. It is my understanding that public comment will be taken on striped bass through March 16th. I would like to submit the following comments and thoughts as a recreational fisherman who has fished for striped bass (or tried) for over 40 years.

From an anecdotal perspective from someone who spends well over 100 hours on the water each season, the striped bass population is in decline in both numbers and size. I would like to see the most restrictive policies on the taking and keeping of striped bass placed on both commercial and recreational fishermen for this coming season. From what I have read and understand no gaff and circle hook regulations are being considered and I feel strongly they should be put in place for both commercial and recreational taking of striped bass.

Also, I am opposed to any increasing of the season length, number of days or changing of days for the week for commercial striped bass fishing. It is an irrefutable fact that large breeder female striped bass are those targeted by current commercial regulations. From an ecological standpoint this does not lead to a stronger population in the future.

Any regulations going forward need to be first, conservation minded in the best interest of the fish (including considering a lot limit), second, allow sustainable taking of striped bass by recreational fishermen and this allow the handful or two of true commercial fishermen targeting striped bass to continue to meet their financial ends in a way that best protects the fish. For example, tagging at point of catch versus point of sale and a slot limit with a lower quota.

Sincerely,  
Edward Purcell  
15 Sassawanna Road  
Rutland MA



**From:** [Brett Stone](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment striped bass  
**Date:** Thursday, March 12, 2020 3:13:24 PM

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Hello,

Due to the cancellation of the Mass Maritime public meeting today, I would like to add the following records to public comment. As a recreational and commercial fisherman in Massachusetts, I 100% support the proposals for the Recreational and Commercial modifications in 2020. In addition, in each the last 3 commercial seasons Striped Bass quotas have barely surpassed 65% quota at the end of the season and I would like to see Sunday(s) added as a Commercial Fishing Day. Thank you very much for listening.

Sincerely,  
Brett Stone  
43 Hazelwood Road  
South Dennis, MA 02601

**From:** [Nelson Sigelman](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** public comment  
**Date:** Friday, March 13, 2020 10:26:10 AM

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March 13, 2020

To: Dan McKiernan, Acting Director, Division of Marine Fisheries  
Marine Fisheries Commission

I support the proposal to separate the recreational striped bass slot limit size and the commercial size limit. It is a realistic and straightforward solution to the complexities of regulatory enforcement.

However, the weak link is the ability of recreational fishermen who have no intention to sell their catch to purchase a commercial permit. This is unfair to the recreational fishermen who abide by the rules, and commercial fishermen for whom striped bass is an important source of income.

It is the nature of recreational fishermen, particularly those that cut corners, to brag. Photos will be posted to social media of recreational fishermen holding big fish. It will send the wrong message.

On the other side of the ledger, large fish taken on a commercial permit that do not enter the market will not be reflected in the quota. That is unfair to the commercial sector.

I think there ought to be a threshold for an individual to purchase a commercial permit, or at the very least, renew a permit. That could be evidence of commercial sale in the past, or evidence of income earned in a commercial fishing capacity, for example working in a fish market, on a boat.

At the March 12 DMF public hearing on the Vineyard you provided a graph that reflected a large gap between permit holders and reported sales. At the very least, perhaps this season DMF could send an email to commercial permit holders who reported no sales last year that the endorsement is strictly for the use of commercial fishermen. It is time to address that discrepancy in order to maintain confidence in our fisheries management system.

Sincerely,

Nelson Sigelman  
PO 4530  
Vineyard Haven, MA 02568

--

***[Martha's Vineyard Fish Tales](#)***: *How to catch fish, rake clams, and jig squid, with entertaining tales about the sometimes crazy pursuit of fish*

***Martha's Vineyard Outdoors, Fishing, Hunting and Avoiding Divorce on a Small Island***

MV Times Review, Jan. 2, 2018, "[Good Sports](#)"

Vineyard Gazette, May 25, 2018, "[Front Row Seat to the Natural World](#)"

[marthasvineyardoutdoors.com](http://marthasvineyardoutdoors.com)

**From:** [Sam Adams](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Amendment to 322 CMR 6.07 - Striped Bass Commercial Fishing Season  
**Date:** Tuesday, March 10, 2020 7:39:24 PM

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To the Division of Marine Fisheries,

As a lifelong fisherman and conservationist I have watched the decline of the striped bass fishery with dismay. This decline is a product of fisheries policies, many of those by states to our south. You are in the enviable position of being able to act now to help the striped bass. Please do not extend the commercial fishing season in June as is proposed. Doing so will significantly contribute to the decline of this already much-beleaguered species. The gain to commercial fishermen will only be transitory because their haul will diminish next year's haul. Amending 322 CMR 6.07 to extend the season will be stealing from the future for little gains today. It's bad policy.

Respectfully,

Sam Adams

Sent from my iPhone

**From:** [patrick@capecodonthefly.com](mailto:patrick@capecodonthefly.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** comment on changes to commercial and recreational fishing limits  
**Date:** Tuesday, March 10, 2020 10:04:28 PM

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Attn: Acting Director Daniel McKiernan  
Massachusetts Division of Marine Fisheries  
[marine.fish@mass.gov](mailto:marine.fish@mass.gov)  
251 Causeway Street, Suite 400  
Boston, MA 02114

To Director Daniel McKiernan,

I am writing to comment on proposed changes to the commercial and recreational fishing limits to be implemented during the spring of 2020. I reserve additional comments for the scheduled public hearings and will focus here on one of the proposals: the move to open the commercial season for striped bass from June 23 to as early as June 1.

I respectfully oppose such a change for the following reasons.

I have been fishing around Cape Cod for 30 years and recently transitioned to doing so for a living as a guide, primarily focused on fly fishing for striped bass and bluefish from our inshore waters. As you know, both species are overfished and overfishing of striped bass is occurring. While I applaud some of the recent changes intended to reduce the harvest of bluefish in light of its overfished status, management decisions in connection with striped bass by the Atlantic States Marine Fisheries Commission, including allowing states to circumvent the commission's best intentions through the misapplication of conservation equivalency, have been far less reassuring. In light of the fact that a slot limit for the stock is new and as of yet unproven a precautionary approach to interrelated state level decisions is warranted.

I recently attended a workshop about fisheries science sponsored by the Gulf of Maine Research Institute at which National Marine Fisheries Service scientists actively participated and I am generally confident in the science used to arrive at the latest stock assessment. Not only does the striped bass stock assessment point to a fishery in peril if appropriate action isn't taken, the facts on the ground support the same concern, including commercial striped bass landings.

In 2019, the commercial sector in Massachusetts landed only 67 percent of its quota, a continuation of what appears to be a change of course that started the year before when 89 percent of the quota was landed. In each of the previous 13 years listed on the division's website, the quota was either exceeded or nearly met in full, reflecting the improved health of the fishery after the dark days of the 1980s and, presumably, efforts to properly manage the stock across all sectors. That work has clearly fallen off or failed to keep up with environmental conditions and effort, and both the commercial and recreational sectors have suffered for it, as have the fish.

That being the case, everyone needs to do their part to help bring the fishery back before it

approaches the brink yet again. In my business I have changed to a strict catch and release policy for striped bass. While I understand that catch and release mortality is a point of concern, I plan to use the opportunity to educate clients on the proper handling of fish and the facts - good and bad - about catch and release. I am also redoubling my efforts to use the proper equipment to land fish quickly, keep them in the water whenever possible and use only single, barbless hooks for both fly fishing and light tackle clients. The more fish that go back into the water, the more will survive in absolute numbers, even if the catch and release mortality rate increases.

Because I know the outsized role of the recreational sector in harvest through either landings or catch and release mortality, I don't fault the commercial sector for the current state of the fishery. Far from it. I do, however, have concerns with any potential expansion or the full realization of any sector's effect on the stock at this particular and crucial point in time. This includes not only the early opening of the commercial season but also the issuance of commercial licenses in an as-of-yet unlimited entry fishery, the unrealized potential of those licenses already issued (especially in light of the recent correction in world markets and the potential ripple effect on local economies) and the effect of recreational harvest - both legal and illegal - at places like the Cape Cod Canal. The true commercial fishers I know are extremely efficient and, if the fish are available, they will find them. The fish aren't there for a reason, and simply widening the window of opportunity won't change that. In fact, it will likely exacerbate scarcity by putting additional pressure on the large fish the recreational slot limit was intended to protect, especially with decisions made by other states to effectively expand that slot depending on which side of the border you are fishing from. With all these concerns in play, this is not the time to open the commercial striped bass season early in Massachusetts. Keep it at June 23 and continue to focus on educating anglers about the new rules. I know fishermen who have only learned of the slot limit when I've told them and I'm sure there are plenty of others who remain unaware of the changes and who will still be unaware when they hook their first fish of the season.

While other states have taken different approaches to striped bass management, Massachusetts has led the way in attempting to protect the future of the fishery. This includes the early implementation of circle hook regulations, efforts to close loopholes in shore-based commercial fishing that had helped fuel problems along the canal, and the recent letter you and Raymond Kane sent to Rhode Island officials urging them to reconsider their conservation equivalency proposal. Your efforts in your role on the ASMFC have also not gone unnoticed. Thank you. Managing a coastwide stock is never going to be easy. And, while Massachusetts has led in many respects, other states have not been so quick to recognize the role they must play in improving the situation. Rebuilding the stock will take years, longer still because of decisions beyond our control and our borders. Taking this action would be a step backward at a time when we are already falling behind. Please continue pushing forward.

Thank you for your time and feel free to contact me if you have any questions.

Regards,



Regards  
508-246-3757  
patrick@capecodonthefly.com  
capecodonthefly.com



**From:** [Adam Triano](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial striped bass fishing  
**Date:** Tuesday, March 10, 2020 5:51:02 PM

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How can a government agency disrespect a fishery that is already damaged. You didn't make quota last year...why would you  
Kill more...disrespectful...please don't open the season early. Get rid of it. It's dirty mercury bass anyway. Top dollar scam.



**From:** [Jarrod D Stokes](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass Fishing  
**Date:** Tuesday, March 10, 2020 6:10:44 PM

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Hello,

My name is Jarrod Stokes and I am an avid surf fisherman who enjoys the catch and release of primarily Striped Bass. Fishing for this species brings me joy in so many ways but I fear that commercial fishing is posing a threat to this keystone species. I am vehemently opposed to moving up the commercial season and would even like to see further restrictions on recreational fishing. Please help protect this species so future generations can enjoy the thrill of catching Stripers.

Respectfully,  
Jarrod Stokes

**From:** [John asseng](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass Proposal  
**Date:** Wednesday, March 11, 2020 7:43:59 AM

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As a Resident of New Hampshire, I spend a few short days a year fishing recreationally around the Cape and surrounding islands. It concerns me to see the State give more and more to the commercial fishermen simply because they didn't meet a prior year quota. Please do your best to establish management plans that look out for the interest of the resource and not the commercial entity driving your decisions. Opening the commercial season on striped bass early will also affect more northerly states like New Hampshire and Maine.

Thank you for this consideration,

John Asseng  
Marlow, NH

**From:** [Sean Fitzgerald](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped bass season  
**Date:** Tuesday, March 10, 2020 5:53:33 PM

---

I who heartedly believe that starting the commercial striped bass season will be detrimental to the already fragile striped bass stock. I totally against this.

Respectfully  
Sean Fitzgerald  
Sent from my iPhone

**From:** [Ryan Conceicao](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Early Striper Season  
**Date:** Tuesday, March 10, 2020 8:31:59 PM

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To Whom it May Concern,

If you allow the striped bass commercial fishing season to start early before the larger migratory fish are able to travel up the northeastern coast to NH/ME, you are no better than the Jersey scum that destroys the striper population. Rather than contributing to conservation, you are destroying the future generations of the game fish that represent the northeastern states. Please work towards conservation.

Best,

Ryan

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Striped bass fishery  
**Date:** Wednesday, March 11, 2020 7:27:11 AM

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**From:** Chris Fatzer <chris.fatzer@gmail.com>  
**Sent:** Wednesday, March 11, 2020 7:23 AM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Subject:** Striped bass fishery

I am very concerned about the state of the striped bass fishery and want more conservative management measures, not less. Allowing earlier harvesting will deplete an already depleted biomass. Please do not allow an earlier commercial harvest. We all as fisherman need to conserve our fisheries and I believe not allowing an earlier commercial harvest will help ensure the fishery stays healthy for future anglers.

Sincerely  
Chris Fatzer

**From:** [jakenichols@maine.rr.com](mailto:jakenichols@maine.rr.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposal Concerns  
**Date:** Tuesday, March 10, 2020 10:58:12 PM

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Dear Director McKiernan,

I'm writing to express my opposition to the proposal to open the Massachusetts commercial striped bass harvest earlier than June 23, as I am gravely concerned about the current state of the striped bass fishery and even more afraid of where we will be three years from now. I have been a resident of Maine for my entire life, and have lived on the ocean fishing recreationally for striped bass since elementary school. The decline in the quantity and quality of the striped bass that reach our summer waters has been evident for years now.

Many are quick to blame the commercial guys, but those who really pay attention know that this is a collective effect of both commercial and recreation. I have done all that I can to educate myself and others on proper fish handling and ways to fish with the utmost respect for the resource. I fear this proposal will take away a large number of those fish that myself and so many other Mainers have dedicated their lives to pursuing and protecting. I have found that the tight knit community of recreational fisherman in this state has greatly improved their conservation efforts over the years, and would love to see our commercial counterpart have the foresight to make decisions that will allow us both to profit not only financially, but emotionally for years and years to come.

When I see that ONLY 67% of the quota was met last year, I feel extending the season is only a foreshortened idea and a short term fix that will be DETRIMENTAL in the long run. I am sure that this low percentage of catch is not due to the time spent on the water, but an overall decrease of numbers and size of fish available. If given more time to harvest these fish on their journey to my beloved state, it may satisfy the quota this year, but the amount of fish that are continued to be taken out of the system will only compound on itself, and before we know it, we may have destroyed the resource that so many depend on.

I would like to state that I am not against commercial fishing, I believe it is an integral part and embedded in the rich history of the Atlantic coast and many people rely on it to support their families. I understand the logic behind the argument that commercial striped bass anglers have an approved quota and thus should be allowed more opportunity to harvest that quota, but I don't believe it would be a prudent management decision if we wish to preserve this resource for our children to enjoy.

Retaining the June 23rd opening of the commercial season sends a signal to all stakeholders that you and the Massachusetts DMF are committed to taking steps in the best interest of rebuilding this fishery. The measurable decrease in commercial harvest landings in 2019 and 2018 are a message that should not be ignored. I heard resounding approval of your organization's 2019 decision to keep the open commercial harvest days at two when it was clear that we wouldn't reach the quota cap. My understanding is that the decision was based in part upon the volume of public comments opposed to adding the third day. Your organization listened to public input last year and I hope will do the same this year.

Respectfully,

Jacob Nichols

**From:** [bg brown](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** proposal for menhaden fisheries  
**Date:** Tuesday, March 10, 2020 6:11:21 PM

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Dear Daniel McKiernan,

My name is BG Brown. I'm a commercial fisherman out of Gloucester. I have recently participated in the open access menhaden fishery using a purse seine and have made plans on scaling up my operation. I have invested in thousands of dollars of equipment for the upcoming season and now the permit I was interested in buying may become useless if a control date is set before there any fish around to get landing history on the permit. I know at least one other fisherman in the same boat I'm in. I understand the need to eliminate some of these permits to maintain a viable fishery. As it stands now there are one or two big players in the fishery and i'm sure they don't want to see any new faces in the industry. It seems wrong that a couple of individuals more or less control the entire fishery. I have participated in lots of different fisheries over the years and the menhaden fishery is like most, it's a volume fishery. My ask would be to set the control date for midsummer sometime, allowing for new participants to have access or what i would rather see (because i don't agree with volume fisheries) is to keep the open access permit(6000lb/day) open even after the big players land the quota in 15 fishing days. 6000 pounds a day is just enough to make a little bit of money and catch my own lobster bait when the demand picks up in August. I thank you for your consideration.

Sincerely,  
BG Brown  
F/V Kathryn Leigh



**From:** [Henry Onli](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposal to start commercial fishing season earlier  
**Date:** Tuesday, March 10, 2020 6:01:10 PM

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I do not know the appropriate way to write this.

But i, as an individual absolutely OPPOSE the proposal to start the commercial season on June 1st (instead of June 23rd)

As i believe this will affect the future of the fishery in a negative way.

Please reconsider!

Henry Leoncio

**From:** [Robert Percy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed early open to commercial bass fishing  
**Date:** Tuesday, March 10, 2020 7:22:47 PM

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Hello,

I am emailing you to express my disagreement with the proposed early open of commercial bass fishing. With the population already in decline they need all the time they can get to spawn, maybe keeping the season open later would be a better option.

Thank you,  
Robert Percy

**From:** [Bryan Rosa](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Commercial Striped Bass Regulations  
**Date:** Monday, February 24, 2020 8:38:51 PM

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Daniel McKiernan,

The Massachusetts public hearing notice LITERALLY states, "...ASMFC has reduced the states' coastal commercial quotas for striped bass by 18% to end overfishing." To open the commercial season early is possibly the most foolish thing I've ever heard. The quota was not met in previous years for one reason and one reason alone—a lack of fish.

It's pathetic and downright disgusting to see that there are individuals saying the commercial season should open early, in the same paragraph that states striped bass are being over fished.

I understand people make a living by commercial fishing for striped bass, but opening the season early is only going to eliminate what little stock we have left. It is a much smarter and long term business plan to throttle back at this time and be smart about harvesting so that both recreational and commercial fisherman can continue to utilize this wonderful species were fortunate enough to have in our backyard.

Sincerely,

Bryan Rosa

**From:** [Andy Wills](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 fishing  
**Date:** Saturday, February 15, 2020 12:11:48 PM

---

I believe that we should not let any of the bans up... We are trying to preserve the future... We need to give the ocean more time before we ransack all that she gives us once again... How about some catch-and-release policies ? may be no treble hooks? Make some bodies of water barbless? we must do everything we can to preserve our planet because she is not happy with us humans... And guess what the greatest threat to humanity Issss humans ....in all our ignorance.... Sorry yes I am for protecting all the fish for as long as possible....  
Thank you and have a great weekend  
Andy

**From:** [Lou Bartolotta](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 MA STRIPED BASS REGULATION PROPOSALS  
**Date:** Tuesday, February 25, 2020 9:56:19 AM

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**TO: Acting Director Daniel McKiernan**

**Dan;**

**First, thanks for all the hard work on developing the new proposed regs for 2020's striped bass fishing. Personally, I fully support the position taken by Stripers Forever which is defined below;**

**Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

**Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

Thanks  
Lou Bartolotta  
Tight Lines

**From:** [Rick Hickox](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 MA Striped Bass Regulation Proposals  
**Date:** Sunday, March 1, 2020 9:04:29 AM

---

Mr. McKiernan:

I'm writing to express my support for the positions taken by Stripers Forever regarding the proposed regulations to help preserve striped bass stocks. It is critical for all states to take significant steps to reverse the long decline in numbers and quality of these fish. Specifically, I support the following comments:

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, "I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong." -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial "part-timers" (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

Thank you for working to preserve this fishery.

Sincerely,  
Rick Hickox

**From:** [George Jacobi](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 striped bass regulation proposals  
**Date:** Tuesday, February 25, 2020 10:25:42 AM

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Dear Director,

Please excuse the sloppy copying of my concerns regarding the striper fishery in MA. I add this comment, and hope you take it with the seriousness it expresses. Before I retired, I sold tackle across New England for a wholesaler. Some of my customers were also commercial weigh stations for the MA bass fishery, and I consistently heard comments such as “they all cheat” referring to high grading. In other words, for how many large cow bass were sold commercially, there were God knows how many tossed overboard dead as soon as a bigger one was caught. These guys telling me were the guys that knew the reality of the situation. Thus while I support the end of commercial fishing entirely, I must add that the “no gaff” amendment for commercial fishing will have a positive effect right now – and is desperately needed if a total ban cannot be implemented. I repeat, “They all cheat.”

Thank you,

George Jacobi

Mansfield, CT

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks
6. We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.
7. Whether you are a MA resident or visit to fish for Striped Bass, thanks for reading and hopefully see you at one of the hearings (see schedule below) in addition to your sending an email expressing your concerns/input. Please put your personal thoughts into your own words and send an email to Acting Director McKiernan. Thank you!



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

Dear Director McKiernan:

As a commercial fisherman of striped bass since 1976, I would like to make a few comments relative to proposed changes on striped bass commercial fishing.

I am of the belief that "if it ain't broke, don't fix it" as far as commercial fishing for striped bass is concerned. I also believe that the health and management of the fishery is more important than the filling of the quota. We have been fishing under the current commercial regulations for quite a while, and I believe that they have served the commercial fisherman well. We should continue with our current starting date for commercial fishing so that the fish have had time to settle around the state. Opening earlier will just flood Cape Cod Bay, the canal, and P-town with hundreds of boats when I believe it is better to spread the commercial fleet to different sections of waters where 34" fish are available around the whole state. I fish commercially around Monomoy Island and the Chatham area, and it is my experience that fish large enough to sell don't arrive until around Father's Day. Opening the season on June 1 will put undue pressure on Cape Cod Bay and the canal, where the fish are already being pounded by recreational and commercial fishermen.

Historically, it appears that the continual fishing pressure of a certain area is not beneficial for the fishery—case in point, the continual pounding of fish on Handkerchief Shoals, Sandy Neck area in the bay, and the area north of Chatham Lighthouse. These areas are no longer as good as they used to be due to the intense pressure that was put on them for a number of years.

I really don't understand why changing the size limit and changing the days of fishing are beneficial to then improvement of the fishery. It is hard enough catching a 34" keeper, and increasing the size to 35" will just mean that more fish will be caught and released to catch a keeper. I do agree, though, that lowering the size limit "would likely drive more participation in the fishery than the current 34" size" and would affect the current quota. The Monday/Thursday fishing days have enabled commercial fishermen to get a decent price for their catch. Why change something that is working fine?

Hopefully, some of my comments mentioned here might be helpful in any hearings on striped bass commercial fishing. I would like to thank the Division of Marine Fisheries for doing a great job in helping us to manage our fishery. I know it is not easy. Thank you very much for your consideration on this matter.

Sincerely,



Richard Cotti  
402 Fuller Street  
Ludlow, MA 01056

maureen50@charter.net

From: Edward Horowitz horowitz.es@live.com  
Subject: Fwd: Advisory: Winter 2020 Public Hearing Notice  
Date: Feb 8, 2020 at 3:01:20 PM  
To: Judy Horowitz horowitz.je@icloud.com

Sent from my iPhone

Begin forwarded message:

**From:** Edward Horowitz <[horowitz.es@live.com](mailto:horowitz.es@live.com)>  
**Date:** February 8, 2020 at 2:34:38 PM EST  
**To:** "[marine.fish@public.govdelivery.com](mailto:marine.fish@public.govdelivery.com)"  
<[marine.fish@public.govdelivery.com](mailto:marine.fish@public.govdelivery.com)>  
**Subject:** Re: Advisory: Winter 2020 Public Hearing Notice

I have had an opportunity to review the proposed revised regulations. I am a recreational fisherman living full time on Cape Cod and have seen a significant decline in the number of larger striped bass. Last year was the worst striped bass fishing on the Cape in many years.

The recreational proposals seem reasonable as long as all recreational, including charter boats are made to comply in all of the Atlantic Coast States. As for commercial fishing there should be a moratorium on all striped bass until the stock rebuilds itself. As for horseshoe crabs, the stock seems to be decreasing which affects bird life and therefore there should be a moratorium on any horseshoe crab taking. As for large striped bass being somewhat dependent on menhaden I would drastically reduce the amount of menhaden allowed to be taken, especially by large commercial fishing boats.

Thank you

Edward Horowitz

*Edward Horowitz 2/9/20*

Sent from my iPhone

On Feb 8, 2020, at 7:43 AM, "[dwm4750@yahoo.com](mailto:dwm4750@yahoo.com)"  
<[dwm4750@yahoo.com](mailto:dwm4750@yahoo.com)> wrote:

**From:** [Captain Joe LeClair](#)  
**To:** [Robert Jr. Popeo](#); [Paul Popeo](#); [Hap Ellis](#); [nick greville](#); [nick crocker](#); [Greg Benning](#); [Robbins, Gregory K.,M.D.](#); [greasybeaks@icloud.com](#); [lightfly@gmail.com](#); [Sam Barnard](#); [David von Jess](#); [Alan Steinert](#); [Steve Woodsum](#); [Kessler, Ross \(FWE\)](#); [Joe Wright](#); [ned kittredge](#); [William Ducas](#); [Mike Porco](#); [Matt Bickford](#); [Captain Allan Got Strypr](#); [Crosby Beane](#); [john marabello](#); [Thomas & Thomas](#)  
**Cc:** [Fish, Marine \(FWE\)](#)  
**Subject:** Advisory: Winter 2020 Public Hearing Notice  
**Date:** Friday, February 21, 2020 10:36:10 AM

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Acting Director Daniel McKiernan

This motion is a joke, puts large striped bass that are headed for maine and other points north at risk as well. We do not get our resident fish until the end of June. With the season the way it is now we are depleting one segment of the mature population. If we shift it around and keep it open into september we are going after different fish. This is only necessary because we dont have enough of our own fish in the size class comercial fisherman are targeting. These dates should not be changed !

Captain Joe LeClair  
North Eastern Anglers  
[www.flyfishsalt.com](http://www.flyfishsalt.com)

**Subject:** FW: Advisory: Winter 2020 Public Hearing Notice

Joe-

There is a motion to shift comm bass season to June 1 as opposed to the June 23 date from last year.

---

**Subject:** Advisory: Winter 2020 Public Hearing Notice

Having trouble viewing this email? [View it as a Web page.](#)

February 7, 2020

## Advisory: Winter 2020 Public Hearing Notice

The Division of Marine Fisheries (DMF) has scheduled public hearings and a public comment period to solicit feedback on proposed changes to commercial and recreational fishing limits to be implemented during the spring of 2020. These proposed regulations affect:

- bluefish recreational possession limits;
- striped bass recreational size limits, circle hook mandates, and the use of devices to remove striped bass from the water;
- striped bass commercial seasons, fishing days, and size limits;
- black sea bass commercial possession limits and bycatch allowances;
- summer flounder commercial possession limits;
- menhaden commercial possession limits and permitting;
- horseshoe crab commercial bycatch allowances;
- sand lance commercial possession limits;
- sea herring days-out management and spawning closures in Area 1A; and
- other regulatory housekeeping items.

The full public hearing notice is available [here](#). Additionally, the public hearing notice, draft strikethrough regulations and other pertinent documents are available on the agency's [webpage](#) dedicated to proposed regulations.

DMF will accept written public comment on these proposals through 5 PM on Monday, March 16, 2020. Please address all written comments to Acting Director Daniel McKiernan and submit to DMF by e-mail at [marine.fish@mass.gov](mailto:marine.fish@mass.gov) or by post to 251 Causeway Street, Suite 400, Boston, MA 02114. In addition, DMF will hold three public hearings throughout the Commonwealth. The public hearing schedule is below:

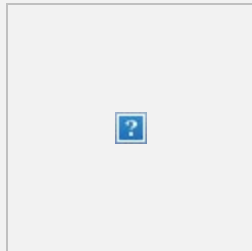
## Public Hearing Schedule

**March 10, 2020**  
6 PM  
Coolidge Middle School  
89 Birch Meadow Drive  
Reading, MA 01867

**March 12, 2020**  
9:30 AM  
Tisbury Town Hall  
Katharine Cornell Theater  
51 Spring Street  
Vineyard Haven, MA 02568

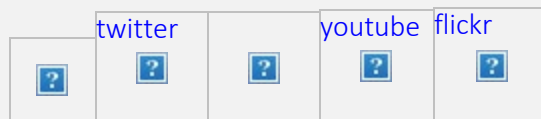
**March 12, 2020**  
6 PM  
MA Maritime Academy  
Admiral's Hall  
101 Academy Drive  
Buzzards Bay, MA 02532

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### Massachusetts Division of Marine Fisheries

251 Causeway Street, Suite 400, Boston, MA 02114  
(617) 626-1520 | [Contact Us](#) | [Find a Location](#)



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**From:** [Celia Rapp](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** attn: Daniel McKiernan  
**Date:** Monday, February 24, 2020 9:42:30 PM

---

Dear Mr. McKiernan,

I am reaching out to express my concern for the Striped Bass industry and stock for the 2020 season, and future seasons to come after reading your proposal. The trends, for some time now, have been decreasing, and opening up the season to extend commercial fishing to an already depleting population of fish is simply irresponsible. I fear that an extended season will only continue the downward trend, and further hurt the Massachusetts natural ecosystem, as well as the massive tourist industry associated with chartered fishing and local recreational fishing.

Data is showing us that the striped bass numbers are decreasing--as evidenced by meeting only 67.4% quota in 2019, and 88.9% in 2018. As much as we would like to argue that extending the season will help MA reach its quota, the reasonable and logical explanation is that we are overfishing. I would hate to see these numbers dip even further in years to come, and choke out the industry all together.

Please, I ask you to reconsider this proposal, and work together to conserve this precious species, and all of the positive things it brings to our states, and New England as a whole.

Sincerely,  
Celia Rapp

--

Celia Rapp, BSW  
Simmons University, '21  
Providence College, '16  
C: 508-364-0738  
[celia.rapp@simmons.edu](mailto:celia.rapp@simmons.edu)

**From:** [fastgrab11](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Bluefish recreational bag limit  
**Date:** Friday, February 7, 2020 3:41:54 PM

---

I strongly believe the new regulations regarding bluefish should have the creel limit at 5 fish of any size. Or have slot sizes of 10 fish under 14" and 2 fish over 21", all other sizes being illegal to harvest.

Sincerely,

Modusser Parwaz

Sent from my Verizon, Samsung Galaxy smartphone



**From:** [Richard Crafts](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Clients aboard Charters  
**Date:** Tuesday, February 25, 2020 8:22:07 AM

---

Good morning,

First, please let me thank you and your staff and members for all the continued help with our plight. As a life long salt water fisherman who has traveled from NH and the last 40 yrs from VT, I do so hope in my remaining years [72] that i see some improvement in the Breeding size / age class. For the last 20 yrs i have been traveling down to the Cape for 3 different trips of 12 days each staying at local motor inns. Out of staters bring alot of \$\$\$ to the state's waters and as you must guess i am not a fan of commercialism in any form. Yes the rec fisherman's probably accounts for the biggest mortality rates, but i am having a really tough time with the **PROPOSED CLIENTS OF CHARTERS GETTING TO KEEP TWO KEEPERS.**

Thank you for your time  
Richard H Crafts  
Manchester, Vt.

**From:** [Mike Spinney](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comment on Proposed Changes to Marine Fishing Regulations  
**Date:** Friday, February 14, 2020 8:44:02 AM

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To the Department of Marine Fisheries -

Thank you for the opportunity to comment on the proposed 2020 marine fishing regulations. I am writing specifically on the issue of commercial and recreational striped bass.

First, I would like to express my appreciation for the Division's stand on the recreational striped bass fishery. Adopting the recommended slot limit changes and taking a leadership position on the use of circle hooks sets a good example for other states.

As for the proposed changes to commercial regulations, I am opposed to opening the commercial season early. I recognize the change is intended to help commercial fishermen to meet the quota, which they failed to do the last two years, but at a time when the striped bass stocks are known to be in jeopardy, I think increasing the effort is the wrong move.

June is a critical period of northward migration and many of the larger fish caught here early in the month are passing through to New Hampshire and Maine. It's also true that our commercial fishery is focused on breeding sized females and so that effort has long-term effects on the health and future of the fishery at a time when we are trying to reverse course and improve recruitment, reduce mortality, and restore stocks to an abundant and sustainable level.

Please reconsider this proposal in recognition that, if the commercial effort is unable to fill its quota, perhaps that is because the fishery is unable to sustain the quota.

Thank you.

Mike Spinney  
Townsend, MA  
978 660 4053

**From:** [Randy Sigler](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comment on public hearing items  
**Date:** Friday, February 7, 2020 4:42:58 PM

---

Dear Director McKiernan,

The following are thoughts regarding the upcoming public hearing items.

### **1. Recreational Striped Bass:**

**A. Slot Limit:** I fully and enthusiastically support a slot limit of 28” - 35”. As a charter operator running over 800 trips a season for striped bass, this slot limit will dovetail very well with the conservation ethic we embrace, and make it mandatory that the large, breeding females be released. I do foresee any negative consequence for our business due to adopting this new approach.

**B. Circle Hooks:** I fully support a circle hook requirement for all natural bait fishing for striped bass. Again, I see this complementing our conservation goals, and do not foresee any negative consequences by implementing this requirement for all sectors, including for-hire.

**C. Non lethal devices:** Yes ... fully agree with this proposal !!!

**2. Recreational Bluefish:** I fully support reducing the recreational Bluefish bag limit. Three fish per day is plenty for any recreational angler to harvest. I would also fully support adopting the three fish bag limit for for-hire anglers. Furthermore, I would support a vessel limit ... say 6 or 10 fish? In our North Shore waters, bluefish have been quite scarce the last few years. When they are present, it is generally very easy to put many fish in the boat. Bluefish does not store or freeze well, and we advise clients to take only what they can eat fresh (or smoke) that day ... and one or two fish is generally more than enough for them.

**3. Commercial Striped Bass:** In support of all proposed changes.

### **7. Commercial Menhaden:**

**B. Replacing 1,000 lb “incidental” limit:** I am uncomfortable with this replacement. I do understand the value of this fishery for the local lobster fleet, however, I believe this provision creates an unenforceable dilemma. Last year, after the 6,000lb limit was triggered, we continued to see “small scale” purse seiners netting menhaden in large quantities. The typical approach is that the vessel would make a set over a large school of Menhaden, and fill the net. They would then load the boat first (typically into a hold or into a partitioned portion of the deck ... NOT into boxes), and then anchor with the net (still very full) tied alongside the boat. At this point, the lobster boats would come along the other side and take barrel after barrel of bait from the seiner. During lulls, the seiner would load more bait from the net onto the boat.

This creates several enforcement problems. One is that there is no way to measure the quantity of Menhaden that has been retained, or how much has been sold. Additionally, in the absence of enforcement present, the seiner can keep “live” bait alongside the boat replacing what they have sold in order to keep the “retained” portion within range.

I spoke with M.E.P. officers last year during the 6,000lb limit time, and they concurred that it was not something that they could/would check.

I would prefer that once the harvest has reached 100% of quote, that the “incidental” limit remain at 1,000 lbs.

**8. Sand Lance:** I fully support a limit on sand lance harvest. The sand lance represent an incredibly important forage fish for all of the valuable commercial species that we pursue recreationally and commercially. This type of forward thinking protection is exactly what needs to happen. Thank you for this!

As always, a big thanks to all DMF staff for their tireless dedication to protecting and managing the marine resources of the Commonwealth.

Sincerely,

Randy Sigler  
Sigler Guide Service  
1 Peabody Ln  
Marblehead, MA 01945  
[www.Striper.com](http://www.Striper.com)  
[randy@striper.com](mailto:randy@striper.com)  
617-459-1798

**From:** [Tim Petracca](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comments on 2020 DMF - Striper, Black sea bass  
**Date:** Saturday, February 8, 2020 6:04:37 PM

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Hello Director,

Thank you for providing information via email. I cannot attend public meetings due to being out of state during those dates, so here are my written comments:

**With Regard to Black Sea Bass:** With increase in Quota, would it be possible to allow Rod and Reel Shore-based Commercial Fisherman, like me, who fish Striper and Scup via Endorsements to purchase an Endorsement for Black Sea Bass? Seems like I call DMF and they say “no endorsements are available.” If Quota is increased, how about giving shore-based rod and reel folks, like me, a chance to buy an Endorsement for BSB for 2020?

**With Regard to Proposed Strikethrough Language for Winter 2020 DMF Public Hearings:**

Striped Bass Fishery 6.07

Closed Commercial Fishing Days section: Second Thursday in the sentence needs to be deleted and replaced with Wednesday.

Length: Need to define how to measure the fish. (Not over the curve of the fish, but laid flat.)

4 (c) – Second 34” in the paragraph needs to change to 35”.

5 (d) – Needs to be re worded to reflect slot system.

5 (f) – Why do you need the words “Effective Jan 1, 21, this shall apply to all recreational anglers,” as the first sentence already applies to all effective on Jan 1, 2020.

**With Regard to your December 13, 2019 memo:**

Again, the procedure to properly measure the fish needs to be clearly defined.

Thank you for great work and communication and I would sincerely appreciate a response on my Black Sea Bass endorsement inquiry.

Tim

**Timothy J. Petracca, Sr**

C: 435-901-0831

E: [Tim.Petracca@ppcpackage.com](mailto:Tim.Petracca@ppcpackage.com)



Scanned by [McAfee](#) and confirmed virus-free.

**From:** [Richard McGlynn](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comments on proposed changes to commercial and recreational fishing  
**Date:** Tuesday, February 18, 2020 3:16:59 PM

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Mr. Daniel McKiernan,  
Below please find my comments on the respective proposed changes:

### **Regarding the Proposal to Adjust Recreational Striped Bass Limits**

The suggested slot limit of not less than 28 inches and not greater 35 is not the answer. If striped bass are truly in jeopardy than raise the size limit for everyone to a 32 inches or greater or even go back to the 36 inch limit that brought them back from near extinction some years ago. Putting more pressure on the recreational area and allowing commercial fisherman to make up the difference isn't helping anyone especially the striped bass. Keep one size limit for everyone. If the commercial group has only landed 67% of their allotment in pounds then perhaps lowering their size limit to 32 (rather than increase it to 35 allowing commercial fisherman to retain all the larger fish) will help them keep more fish and satisfy everyone. Allowing the commercial group to keep larger fish and restrict the recreational group is unfair.

### **Regarding the Proposal to Adjust Recreational Black Sea Bass Limits**

It appears to me that once again the regulations are in favor of the commercial group which in itself is understandable. However in my humble opinion the size limits should be consistent once again. I'm of the understanding that for the commercial group it is a minimum 12 inch requirement with various levels of weight dependent restrictions while the recreational angler has 15 inch limit with a 5 fish bag limit. Again, lets keep the size limit consistent between groups.

### **Regarding the Proposal to Adjust Period II Summer Flounder Trawl Fishery**

I'm at a loss in understanding the rational behind increasing limit amounts for the commercial group as soon as a species appears to be on the rebound. I can't talk intelligently about summer flounder or fluke south of Cape Cod as my recreational fishing has been on the North Shore of Massachusetts for over 40 years. All I know is that in recent years I've been hard pressed to catch my 5 fish bag limit of 17 inches and over and if I can't meet this by the middle or end of June I'll have to wait until next year. Please give the recreational guys a break and leave this one alone.

### **Regarding the Proposal to Adjust Recreational Blue Fish**

I think most recreational fisherman may be OK with this one as most of us only take what we can or will eat and in the case of the bluefish I personally only want one for the table. Reducing the bag limit is probably a good idea, however this particular fish may be one that

could use a slot limit as the smaller “snapper blues” once common to Long Island etc. are more edible than the bigger blues. Also can someone explain to me how a stock can be overfished but not experiencing overfishing?

### **Regarding the Proposal to Temporarily lift the State Waters Groundfish Closure**

Personally I think this is a bad idea. I abhorred the idea of a moratorium on codfish last year however I noticed that while offshore there were more small cod that were “by-catch” while haddock fishing. In My Humble Opinion let’s suffer one more year with a moratorium for the season, let the fish really recover than open the season next year with a 24 inch minimum for cod. Also try to consistent once again. Reducing the size limits a few years ago then increasing it again at the end of the year was not only irritating I think it may have made matters worse as it appeared to lead to the moratorium leaving us to wonder if NMFS really knows what they are doing.

Please let me know if there is anything else I can do to help.

Best Regards,  
Rich McGlynn  
Miles From Nowhere  
Doc # 1283573

**From:** [John Bachner](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass (322 CMR 6.07)  
**Date:** Tuesday, February 25, 2020 7:19:38 AM

---

Daniel McKiernan,

The Massachusetts public hearing notice LITERALLY states, "...ASMFC has reduced the states' coastal commercial quotas for striped bass by 18% to end overfishing." To suggest opening the commercial season early, in the same paragraph that confirms over fishing, is possibly the most foolish thing I've ever heard. The quota was not met in previous years for one reason and one reason alone—a lack of fish.

In 2018 the quota (88.9%) was not met.

In 2019 the quota (67.4%) was not met.

It's pathetic and downright disgusting to see such a lack of responsibility come from our state, especially following a downward trend in commercial landings for the past two seasons.

Sincerely,

**- John Bachner -**



**From:** [John Bachner](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass (322 CMR 6.07)  
**Date:** Tuesday, February 25, 2020 7:19:38 AM

---

Daniel McKiernan,

The Massachusetts public hearing notice LITERALLY states, "...ASMFC has reduced the states' coastal commercial quotas for striped bass by 18% to end overfishing." To suggest opening the commercial season early, in the same paragraph that confirms over fishing, is possibly the most foolish thing I've ever heard. The quota was not met in previous years for one reason and one reason alone—a lack of fish.

In 2018 the quota (88.9%) was not met.

In 2019 the quota (67.4%) was not met.

It's pathetic and downright disgusting to see such a lack of responsibility come from our state, especially following a downward trend in commercial landings for the past two seasons.

Sincerely,

**- John Bachner -**

**From:** [Germain Cloutier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Commercial Striped Bass Proposal  
**Date:** Monday, March 9, 2020 9:10:43 PM

---

Hello,

Please consider NOT moving the commercial striped bass start date to June 1st instead of the usual date of June 23rd. The current state of the Striped Bass Can NOT afford more pressure. As we all know the stocks have been deemed as overfished and taking measures to try and prevent this from getting worse are in place, with the 18% reductions. By changing seasons/adding fishing days then these measures to try and help the stocks rebound will not work if more harvesting is allowed, especially the harvesting of the big breeder sized fish. There seems to be the stigma of “catch and release mortality” that the commercial fleet tries to use to gain their interests. But the facts are the commercial fleet is harvesting the big breeder fish that the recreational sector can not anymore. And while the commercial fleet is harvesting these larger fish( that are becoming harder to find as shown by the past few years of not meeting the quotas) they are throwing back the smaller fish and those fish will be dying as well. What it boils down to is we need to not change too many things right now, hopefully the current measures in place will help the stocks rebound. But to Move the Start of the commercial striped bass Season to June 1st would NOT be in the best interest for anyone. I know that Massachusetts representatives sent letters to Rhode Island to tell them to take a more conservation minded approach towards striped bass, But the fact is that we need to Keep Conservation at the top of the list here in Massachusetts as well. A lot of guides, bait shops, restaurants, etc. depend on people coming to fish for striped Bass. There is a lot more Worth to the State in the recreational sector then the commercial sector. Thank you for your Time.

Sincerely,  
Germain

[Sent from Yahoo Mail for iPhone](#)

To: DMF Acting Director Daniel McKiernan  
From: Stephen O'Grady, Orleans, MA  
Re: 2020 proposed changes to commercial and recreational fishing limits  
Date: February 15, 2020

Dear Mr. Daniel McKiernan,

I am submitting a comment on the draft regulatory amendments to 322 CMR §§6.00, 7.00 and 9.00, as I will be unable to attend the public hearings this winter.

I am currently a recreational fisherman on Cape Cod, formerly fished commercially out of state, and formerly did shellfish aquaculture in Barnstable, MA. I received my BA from Colby College in Environmental Science with a concentration in Conservation Biology and took several classes on fisheries management. I thank you for the opportunity to comment and for your consideration in the management of our precious marine resources.

I write to comment on each of the below:

**Recreational Bluefish (322 CMR 6.18):** I support changes to reduce the catch limit to 3-fish per day for anglers fishing from shore or a private vessel. I do not understand why the limit would be different for for-hire vessels, and I think the limit should be consistent across the fishery, especially considering that bluefish do not “freeze well” and 3 fish for recreational anglers should be plenty.

**Recreational Striped Bass (322 CMR 6.07):** I support the adoption of a 28”-35” slot limit. If the population is to recover, we need to protect the larger fish, which are well understood to be the most valuable breeders. Additionally, it’s very important that we have consistency across the New England coastal states, as we know striped bass are highly migratory, and one state having a 28”-35” slot limit, while the neighboring state has a 35” minimum size limit, for example, defeats the purpose of the regulations of protecting a specific age class and size class. All the New England States, including MA should be adopting the suggestion of the Atlantic States Marine Fisheries Commission. Consistency in management is valuable!

I do not support the illegalization of tube and worm fishing and snag and drop. These methods seldom account for gut hooking fish, which of course is the intention of the circle hook regulations. They are important techniques for recreational fishermen to be able to employ.

I support the proposed non-lethal device amendment. I’m confident that the vast majority of stakeholders agree that this amendment is a wise one.

**Commercial Striped Bass (322 CMR 6.07):** I cannot support the continued existence of a commercial striped bass fishery. This striped bass’s importance to our state and the

recreational fishing based economy cannot be overstated. As you know, the stocks have been declared overfished, and overfishing is occurring. I understand that the stocks have been overfished for 11 of the last 13 years. A basic understanding of fisheries management history provides one with no shortage of examples of managers doing too little too late for many economically valuable and culturally important species. **NOW is the time to act** and to close the commercial fishery.

While I understand that the commercial fishery is responsible for only about 10% of the mortality of the stock, the large majority of those involved in the commercial fishery are recreational fishermen who take advantage of the commercial opportunity to earn some extra cash. Livelihoods are not at stake here.

Additionally, this is an example of a select few benefitting disproportionately from the exploitation of a *public resource*. This is as easy a decision as a commercial moratorium on the take of striped bass can be.

While I feel strongly that the commercial fishery should be closed, if the decision is made to leave the fishery open, having a minimum size limit of 35" while the recreational fishery has a slot limit of 28"-35" defeats the entire purpose of a slot limit. The commercial fishery, if kept open, should have the same slot limit that the recreational fishery has.

**Commercial Black Sea Bass (322 CMR 6.28):** I support all proposed changes and have no comment on the days of week that the fishery is open. Keeping the weir fishery in existence should be a high priority, as it can be done sustainably (hardly any discard mortality, minimal habitat impacts, and relatively low fuel consumption), and is culturally and historically valuable.

**Commercial Horseshoe Crab Trawl Limits (322 CMR 6.34):** I support the establishment of an open access incidental limit of 75 crabs for trawlers who do not hold a limited entry horseshoe crab permit. However, this fishery should be managed very conservatively, given the critical importance of healthy horseshoe crab populations to migratory shorebirds and also to the biomedical industry. I hope DMF and others are looking at ways that we can reduce the bycatch of horseshoe crabs in trawl fisheries.

**Commercial Menhaden (322 CMR 6.43, 7.01, 7.04 and 7.06):** I do not support rescinding the 95% quota trigger that reduces the limited access fishery's trip limit to 6,000 pounds. The 95% quota trigger should remain in place, to ensure that bycatch allowances are not enabling harvest over the sustainable quota. DMF and ASMFC work hard to determine the sustainable level of harvest, and allowing for harvest (in the form of bycatch) after 100% of the quota is filled undercuts those efforts and may be detrimental to the future health of the resource. The 95% quota trigger allows for a "cushion," safeguarding the resource for future use.

I strongly support a requirement that all limited entry menhaden fishery permit endorsements be owner/operator.

**Sand Lance (322 CMR 6.42):** I support the proposal to adopt a 200-pound possession and landing limit for sand lance to prevent the proliferation of an industrial fishery while allowing traditional bait harvest activity to continue to occur.

In closing, all of these management decisions involve a good bit of guesswork and uncertainty. That is the reality of marine fisheries management. The fact that the Gulf of Maine is warming faster than 99% of the world's oceans only adds to that uncertainty. Managing our public marine resources conservatively is the soundest approach to ensuring that future generations will have access to the same resources that we enjoy today. Thank you for your work.

Sincerely,

Stephen O'Grady  
Orleans, MA  
ogrady.stephen3@gmail.com

**From:** [Levi Opsatnic](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Do Not Start Commercial Season Early  
**Date:** Monday, March 9, 2020 3:48:45 PM

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Good afternoon,

My name is Levi Opsatnic and I fish for striped bass all up and down the Atlantic coast with Massachusetts taking a lot of my time. As someone who loves this state so much, it truly disappoints me to even see this being put to consideration.

It should come as no surprise that our Striped Bass are in trouble and their population is getting worse each year. Considering that the commercial quota is rarely met, it should be a great sign that these fish are overfished and their biomass is very delicate. Please, please, please do not give an early start to the commercial season, this will do nothing but further deplete a fragile resource. I think a lot of anglers are already upset with how the Striped Bass have been treated and this is just an extra blow. Having voiced my opinion on this, I'd love to see Massachusetts do the right thing and choose the ecosystem over the dollar, I'm sure I'm not alone in saying this either. So, once again, please do not begin the commercial season early and do not allow that to pass.

I sincerely thank you for reading this and hope that my comments help to show what is the right thing to do here,

Levi

**From:** [Joseph Mottola](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Feedback re: 322 CMR 6.07 & 322 CMR 6.18  
**Date:** Monday, February 17, 2020 9:33:35 AM

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Dear Director McKiernan,  
I am OPPOSED to the changes proposed by recreational Striped Bass 322 CMR 6.07 and also opposed to recreational Bluefish 322 CMR 6.18.

I support keeping these regulations UNCHANGED.

Regards  
Joseph Mottola  
N. Andover MA

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Comments on 322 CMR 6.07  
**Date:** Thursday, February 27, 2020 2:21:05 PM

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-----Original Message-----

From: James Harrison <jharrismed@gmail.com>  
Sent: Thursday, February 27, 2020 9:21 AM  
To: Fish, Marine (FWE) <marine.fish@mass.gov>  
Subject: Comments on 322 CMR 6.07

I am a recreational striped bass fisherman who travels to the east coast (Martha's Vineyard) to fish for striped bass. I live in Colorado.

With regard to the proposed changes regarding the harvest of striped bass:

1. All fisherman, not just recreational, should be required to use circle hooks when fishing with bait.
2. All fisherman, not just recreational, should be prohibited from removing fish from the water with a lethal device.
3. There should be no harvest of large striped bass at all, recreational or commercial. With the large declines in striper populations, the large breeding fish need to be left in the water.
4. The start of the commercial season, if there is one, should not be moved to June 1. That will expose even more large breeder female to harvesting.
5. The open days for commercial harvest should not be changed from Monday and Thursday to Monday and Wednesday. This change would increase the number of quasi-commercial part-timers harvesting fish.
6. Everything should be done to prevent and disrupt the illegal, sale of wild striped bass. Therefore, the DMF should require all commercially harvested striped bass to be tagged at the point of capture.

Thank you for considering my comments.

James Harrison  
Eagle, Colorado



**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Commercial Striper fishery  
**Date:** Tuesday, March 10, 2020 2:00:26 PM

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-----Original Message-----

From: louis catucci <catucci.louis@gmail.com>  
Sent: Tuesday, March 10, 2020 12:24 PM  
To: Fish, Marine (FWE) <marine.fish@mass.gov>  
Subject: Commercial Striper fishery

This is absolutely ridiculous!!!!

Mass hasn't made there quota in years an every year we're catching more shorts than ever before ! Opening this early for the 3500 commercial A-hats who average a tank of gas out of the Striper fishery is Moronic ! Your killing this fishery an have It has to stop ! Nh an Maine don't even get 30inch fish til end of June ..., enough is enough already Save the Striper fishery Sent from my iPhone

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: My opposition to the proposal of starting the commercial Striped Bass Commercial season early.  
**Date:** Friday, February 28, 2020 10:54:58 AM

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**From:** Stephen Madden <stephenmadden@yahoo.com>  
**Sent:** Thursday, February 27, 2020 8:14 PM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Cc:** Tom Heath <capecodah@gmail.com>  
**Subject:** My opposition to the proposal of starting the commercial Striped Bass Commercial season early.

To: Acting Director Daniel McKiernan

My opposition to the proposal of **starting the commercial Striped Bass Commercial season early.**

The last two years the commercial fleet has failed to take their quota.

Instead of recognizing the problem as a canary in the fisheries coal mine, the consideration of opening the commercial fishery on June 1st 2020, three weeks earlier than usual is ridiculous!

There area a lot of large, breeding sized fish that pass through and around Cape Cod at this time of year heading north. Opening the season early not only hammers those fish, but it extends the focus on breeders for three weeks longer than usual.

Please keep in mind most of the folks fishing for striped bass commercially in our State of Massachusetts are NOT full-time commercial fishermen. They are "Recremercial" Anglers who buy into the fishery for a ridiculously low amount of money (\$160 last I checked) in order to exceed the recreational bag limit. Some of these "Recremercial Anglers" could also be the crooks (Poachers) who sell through the back door of way too many shops and restaurants.

My view on this as well as many, many, other true Recreational Anglers which I talk to, while I am legally Sportfishing and also conversing with, at many various Fishing Club meetings and gatherings.

IT'S A COLOSSAL MISTAKE ! !

Changes to the harvest to achieve an 18% reduction have already been implemented.

Any further action to increase pressure on the stocks is premature at best, destructive and foolhardy at worst.

Please listen to a Seasoned Recreational Angler who wants a Striped Bass fishery for our future ANGLERS !

Best,

Stephen Madden  
Recreational Angler  
7 Susan Circle  
Carver Ma. 02330  
Member  
MSBA, BBAC, SSFC

[Sent from Yahoo Mail on Android](#)

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Proposed Striped Bass Regulations  
**Date:** Thursday, February 27, 2020 2:25:11 PM

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**From:** Justin Cordonnier <Justin.Cordonnier@BFIM.COM>  
**Sent:** Wednesday, February 26, 2020 12:56 PM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Subject:** Proposed Striped Bass Regulations

Acting Director McKiernan,

I have a few comments on the proposed changes to Striped Bass regulations.

1. Please apply the same rules regarding circle hooks and the “no gaff” rule to both recreational and commercial anglers.
2. Please do not move the start date of the commercial season forward (as early as June 1), as this will expose more large (breeders) bass to harvest.
3. An even better option would be to eliminate all harvest of stripers by both recreational and commercial anglers.
4. If the commercial fishery does continue, please require commercial fishermen to tag fish at the point of capture.

Thank you for your consideration.

Justin Cordonnier  
Needham, MA

 Please consider the environment before printing this email.

**From:** [Davis, Shannon \(FWE\)](#)  
**To:** [Silva, Jared \(FWE\)](#)  
**Subject:** FW: Winter 2020 Marine Fisheries Public Comments  
**Date:** Friday, February 28, 2020 8:46:52 AM

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*Shannon L. Davis*

*Revenue Coordinator*

**MA Division of Marine Fisheries**

251 Causeway Street, Ste. 400

Boston, MA 02114

617-626-1621

617-626-1509 FAX

[Shannon.davis@state.ma.us](mailto:Shannon.davis@state.ma.us)

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**From:** Kurt Martin <timebandit100@hotmail.com>  
**Sent:** Thursday, February 27, 2020 12:55 PM  
**To:** Fish, Marine (FWE) <marine.fish@mass.gov>  
**Subject:** Winter 2020 Marine Fisheries Public Comments

To Whom It May Concern:

I am writing to submit comments on MA DMF proposed Commercial Black Sea Bass 2020 quota.

I am in favor of moving towards a 2 day/ week, 450-500 pound catch limit, fishing Monday or Tuesday and Thursday. I do not want to fish on Sunday. Increasing the weekly catch to 1200 pounds per week could be detrimental to the price per pound. Spreading the catch over a longer season would provide a more consistent fishery to support local restaurants and fish markets. To compensate I suggest starting the season 1-2 weeks earlier.

I support increasing the seasonal weir fishery quota, it seems to be a fair percentage.

I also support the incidental catch limit for trawlers.

Sincerely,

Kurt Martin

**From:** [Tom](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Fwd: ACTION REQUEST- 2020 MA STRIPED BASS REGULATION PROPOSALS  
**Date:** Tuesday, February 25, 2020 8:24:39 AM

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Acting Director Daniel McKiernan,

As a recreational anglers and resident of MA I completely support the views expressed below.

How long will you wait to recognize that we have a huge problem?

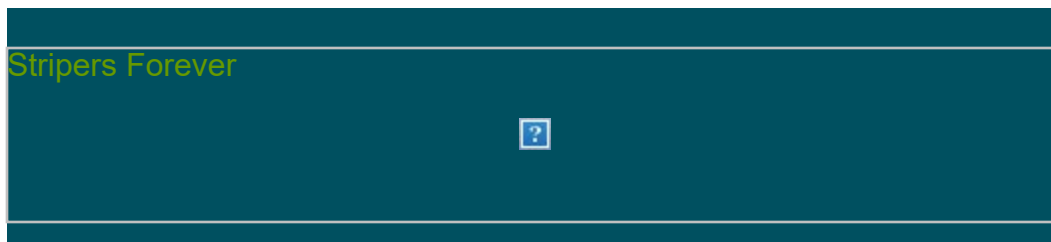
Act now.

Respectfully,  
-TW

-----  
Thomas Wisniewski  
917-885-2616

Begin forwarded message:

**From:** Stripers Forever <stripers@stripersforever.org>  
**Date:** February 25, 2020 at 8:03:16 AM EST  
**To:** Thomas Wisniewski <thomaswis@yahoo.com>  
**Subject:** ACTION REQUEST- 2020 MA STRIPED BASS REGULATION PROPOSALS



## **ACTION REQUEST**

# **2020 MA STRIPED BASS REGULATION PROPOSALS**

Image



## **Regulation changes are coming.**

The MA Division of Marine Fisheries (DMF) has scheduled public hearings and a public comment period to solicit feedback on proposed changes to commercial and recreational fishing limits to be implemented during the spring of 2020. Among many other items on the agendas these proposed regulations address:

- Striped bass recreational size limits, circle hook mandates, and the use of devices to remove striped bass from the water;
- Striped bass commercial seasons, fishing days, and size limits.

Please see DMF info below. Hopefully, you will be able to attend one of the meetings but if not, please send an email expressing your thoughts and suggestions. **Email address, mailing address and public hearing schedule are below, following our comments on the proposed changes.**

“Recreational Striped Bass (322 CMR 6.07). DMF is proposing several measures affecting the recreational harvest of striped bass. These measures are designed to conform state regulations to Addendum VI to the Atlantic States Marine Fisheries Commission’s (ASMFC) Striped Bass Fishery Management Plan (FMP) and reduce recreational discard mortality. The proposals are to: a. Adopt a slot limit of at least 28” to less than 35” total length for the recreational retention of striped bass. This slot limit will replace the current 28” minimum size. b. For 2021, expand the state’s existing circle hook rule to potentially require all anglers whether fishing from shore, a private vessel or a for-hire vessel to use circle hooks when fishing

with whole or cut natural baits and eliminate existing exemptions for certain terminal tackle configurations (e.g., tube and worm, snag and drop). c. Prohibit recreational anglers from removing striped bass from the water with any device other than a non-lethal device. Non-lethal devices will be defined as a device that does not pierce, puncture, or otherwise cause invasive damage to the fish that may result in mortality.” MA DMF

“Commercial Striped Bass (322 CMR 6.07). Beginning in 2020, the ASMFC has reduced the states’ coastal commercial quotas for striped bass by 18% to end overfishing. At our existing 34” minimum size limit, Massachusetts’ quota is expected to be approximately 713,000 pounds. To best utilize this quota, DMF is proposing several adjustments to the state’s commercial striped bass management regulations: a. Move the start of the commercial fishery from June 23 to as early as June 1. b. Adjust the open commercial fishing days from Mondays and Thursdays to Mondays and Wednesdays. c. Increase the minimum size from 34” to 35”. This will result in there being no overlap between lawfully sized commercial fish and lawfully sized recreational fish. If this change is adopted, DMF will also rescind: 1) the requirement that commercial anglers fishing recreationally for striped bass clip the right pectoral fin of any striped bass measuring at least 34” and 2) the allowance for dual commercial and for-hire permit holders to sell any commercially conforming striped bass caught by their clients. d. Maintain existing daily landing limits.” MA DMF

### **Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill  $\frac{3}{4}$  million pounds of these large breeders. It is simply wrong.” - B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will



increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.

5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

### **Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

Whether you are a MA resident or visit to fish for Striped Bass, thanks for reading and hopefully see you at one of the hearings (see schedule below) in addition to your sending an email expressing your concerns/input. Please put your personal thoughts into your own words and send an email to Acting Director McKiernan. Thank you!

## **ACT NOW!**

The DMF will accept written public comment on these proposals through **5 PM on Monday, March 16, 2020**. Please address all written comments to Acting Director Daniel McKiernan and submit to DMF by either email or post mail.

**Email:**

Acting Director Daniel McKiernan, [marine.fish@mass.gov](mailto:marine.fish@mass.gov)

**Post mail:**

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

**Public Hearing Schedule:**

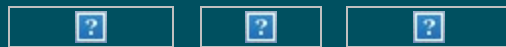
March 10, 2020  
6 PM  
Coolidge Middle School  
89 Birch Meadow Drive  
Reading, MA 01867

March 12, 2020  
9:30 AM  
Tisbury Town Hall  
Katharine Cornell Theater  
51 Spring Street  
Vineyard Haven, MA 02568

March 12, 2020  
6 PM  
MA Maritime Academy  
Admiral's Hall  
101 Academy Drive  
Buzzards Bay, MA 02532

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To contact [Stripers Forever](#) please email us at [stripers@stripersforever.org](mailto:stripers@stripersforever.org) or visit [stripersforever.org](http://stripersforever.org)



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Forever



Thanks,

Stripers Forever  
"Make it a Game Fish!"  
209 Winn Road  
Falmouth ME 04105  
USA

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**From:** [fishingsister@aol.com](mailto:fishingsister@aol.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [fishingsister@aol.com](mailto:fishingsister@aol.com)  
**Subject:** Fwd: Public Comment-Extending the Commercial Striped Bass Season  
**Date:** Monday, March 9, 2020 10:08:09 AM

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Subject: Public Comment-Extending the Commercial Striped Bass Season

**It is a horrid idea and in the name of common sense I oppose it!**

**Imagine, "in the name of conservation" we are taking measures to kill less bass and of smaller fish size to protect breeders on the rec side while at the same time we are TRYING TO kill more breeders on the commercial side. How does that make sense?**

**Captain Jason Colby  
Little Sister Charters  
[fishingsister@aol.com](mailto:fishingsister@aol.com)  
617-755-3740  
[www.littlesister1.com](http://www.littlesister1.com)**

**From:** [Rick Rheinberger](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** MA Striped Bass proposed regulation changes  
**Date:** Tuesday, February 25, 2020 3:27:02 PM

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Dear Director McKiernan;

I'm writing in support of the proposed changes to the recreational regulations. I have some issues with the commercial proposals. First and foremost, the regulations should mirror those proposed for recreational fisherman. Use of circle hooks and "no gaff" regulations only make sense for both groups. An earlier opening of the season also puts additional pressure on the large breeding females. After the success of rebuilding the stocks in the 80's it is crazy that we are back here. I have been a proponent of slot limits for decades. Regulations have allowed the targeting of the large breeders (most bass over 15lbs are female). It's time to protect the fish not the fisherman.

Respectfully;

Rick Rheinberger  
Sr. Vice President  
Affiliated Insurance Managers, Inc.  
935 Jefferson Blvd., Suite 2001  
Warwick, RI 02886  
(401) 352-3000 x222  
(401) 352-0020

EMAIL: [rick@aiminsco.com](mailto:rick@aiminsco.com)

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## MAC-ATAC Sportfishing

**Capt. R. Todd MacGregor**

Fishing Guide and USCG Licensed Master Captain

P. O. Box 68 Fairhaven, MA 02719 Office: 508/992-9189 Cell : 508/243-8559

[www.macatacsportfishing.com](http://www.macatacsportfishing.com)

[macatac.sportfishing@gmail.com](mailto:macatac.sportfishing@gmail.com)

To: Dir. Daniel McKiernan; Acting Director  
Massachusetts Division of Marine Fisheries

Date: March 10, 2020

Subject: Comments to the following proposed Draft Fisheries Regulations

---

Dear Director McKiernan:

I am writing this letter as a private citizen/fisherman and not as a member of or representing the views of any organization of which I may be a member.

I read through all of the ASMFC reports for each species. The referenced reports are attached. I find 2 glaring deficiencies with all of these ASMFC reports:

1. These reports are simply based on one specific species and do account for the overall Eco-System. Our ocean is full of many species which all interact with each other. Eco-System based management is mentioned in the Endangered Species Act, the Marine Mammal Protection Act and the Magnuson Fisheries Act. The ASFMC is a Federal Body and should be following Federal Laws.
2. There is not one mention of the largest problem depleting the forage fish and driving predatory fish offshore – **the huge population of Gray Seals**. Many of these animals are 500-700 pounds and we all know that they eat 8-10% of their body weight in various marine species per day. The Seals have destroyed our fisheries and fishermen more than any other contributing factor.

Here are my comments on the specific Mass DMF proposals:

1. **Striped Bass Conservation (322 CMR 6.07)**. DMF is proposing:

- a. Slot Limit:

I am against slot limits of any kind. As a charter fisherman, I am especially against NOT allowing us to retain trophy striped bass. This is the one major reason why people come from all over the world to fish in Massachusetts. In 2005, we had over 25 small boat charter-boats in New Bedford and Fairhaven. I am the last one left running a marginally viable operation. Not allowing the retention of Trophy Striped Bass will, in essence, kill my business and our way of life. We need some format, whether it be a certain number of *Trophy* tags or a

daily bag limit, to allow us to retain big fish. My customers need to be able to dream of catching a 30, 40 or 50-pound fish to get them to book charters.

b. Circle Hooks.

First off, the circle hooks should be *clarified* as straight and not offset circle hooks. I have had a number of gut and gill hooked stripers with offset hooks when we were testing circle hooks 15+ years ago. We also gill hooked 4 small Mako's last summer with straight circle hooks, Therefore, I am not convinced that straight circle hooks offer any type of solution. A tube lure, with a circle hook, will be rendered worthless because these are trolled baits. Circle hooks are designed for live or dead bait that is drifted and/or free spooled. We have to be able to continue to use straight J-hooks on tube lures as has been done since the mid 1960's. Most of us no longer use worms on Tubes as the price for a flat is so exorbitant. We have found other solutions to make Tubes be effective most of the time. Finally, this is an enforcement problem for the Environmental Police. How are the EPO's able to determine if a fisherman is intending to catch a striper, a bluefish or a sea bass? They all mix together. This proposed rule may have good intentions, but is simply not practical.

c. Gaffing.

I am 100% against prohibiting gaffing. Gaffing is the only safe way to handle a large Striper with a large, treble hooked plug across its mouth. The Gaff gives leverage on the fish. Using a net on a large fish, at night, in a heavy rip would endanger my clients and myself as I would lose total control of the fish when it comes over the gunnel. I also use a small, 2" gaff to release big fish by lip gaffing them and keeping them over the side of the boat while unhooking. After releasing tens of thousands of fish, I have found this to be the quickest and safest method. This is the best for the fish as it gets them back into the water quickly and does not allow the fish to flop around on the deck possibly causing injury to the fish. This is the method we used to handle the big fish when I conducted tagging operations with the DMF back in 2000, 2001 and 2002. I have never gaffed an undersized fish as these fish can be handled easily by just hoisting the fish over the side to be quickly released. Stupid fisherman, who Gaff small fish and then release them, fall into the category of 'Wonton Waste' which is already illegal. If gaffing is prohibited, many excellent fishermen, who have been using gaffs for their entire fishing careers, will now be criminals because they will be forced to use the gaff for safety reasons. Once again, this proposed rule may have good intentions but is simply not practical.

2. **Recreational Bluefish (322 CMR 6.18).** As a charter fisherman, 5 fish/day/person is acceptable. I do believe that it is inequitable to discriminate against private, recreational fisherman by only allowing them 3 fish per person. I have never considered myself to be more privileged because I have a Mass. Commercial Boat permit, a Charter-boat permit, or hold a Master's license. All fisherman should be treated equitably.

3. **Commercial Striped Bass (322 CMR 6.07).** June 1<sup>st</sup> is a Good start date. I like Mondays and Thursdays as it allows another day for the market to clear out

Monday's fish. Monday/Thursday ensures that fresher fish are being provided to the consumers. The DMF should consider a third day for Commercial Striper Fishing. We have to be allowed to sell fish caught on charters. It is tough enough to make it now, please do not put up another barrier to our success. Also, we need to be able to fish on holiday weeks. Eliminating commercial striped fishing on July 2<sup>nd</sup>, July 6<sup>th</sup> or Sept 7<sup>th</sup>, because the parking lots at launching ramps are too crowded, is ludicrous. It makes no sense to use a fisheries law to regulate parking. This also prevents Fresh Fish from entering the market during holiday periods with extremely high demand.

4. **Commercial Sea Bass (322 CMR 6.22)** Since Massachusetts will have a 60% increase in quota, I think the commercial season should start much earlier than July 12<sup>th</sup>. I support starting the Black Sea Bass Commercial rod-n-reel season in June 7<sup>th</sup> and keeping the daily trip limit at 150#. This will help achieve the maximum economic return for this resource over a longer period of time. There also has to be 3 open days per week to allow for one day of bad weather; I support continuing the Sunday/Tuesday/Thursday format. Rod-n-reel commercial fisherman should also have the same trip limits and fishing dates as fisherman using all other gear types enjoy. It has always been discriminatory to allow pot fishermen or dragnets to have larger trip limits. I have nothing against people who fish with other gear types. However, there should be equity.

It is time that the Commonwealth of Massachusetts Division of Marine Fisheries, and the Marine Fisheries Commission, work towards achieving the maximum economic benefit for the Commonwealth. It is also time to stop marginalizing small boat fishermen. Finally, it is time to take a stand, for all Massachusetts fisherman, and confront the **Gray Seal Issue**. We must confront the greatest issue negatively affecting our fisheries. Massachusetts must send a message to the Federal Gov't that we know the real problem and intend to address it.

Thank you for considering my comments.

Capt. R. Todd MacGregor  
Fairhaven, MA



**From:** [James Giles](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** New Regs  
**Date:** Tuesday, February 25, 2020 9:24:50 AM

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Is there no way to stop the killing of the cow stripers? 3/4 of a million lbs are you daff?  
Something has to change! I remember when we couldn't keep any! Let's bring that back for a few years and maybe we can replenish the stock.

[Sent from Yahoo Mail for iPhone](#)

**From:** [Sean Tracey](#)  
**To:** [Fish, Marine \(FWE\); Stripers Forever](#)  
**Subject:** New Regulations for Striped Bass Fishery  
**Date:** Tuesday, February 25, 2020 3:56:55 PM  
**Attachments:** [STA Logo Color.png](#)

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Dear Acting Director Daniel McKiernan,

I am an avid striper fisherman (recreational only, mostly on fly rod, strictly catch-and-release) for 50+ years. I grew up on Bass River on the Cape in the 1960s and 70s when there were hardly any stripers, so I know how great it is that we now have a good fishery. I have seen it decline in the past 15 years, though, as I am now a NH resident and fish mostly from Portsmouth NH.

I visit the Cape where I have family, buy a licence, and pay charter captains from mid cape and P Town area to take my wife and I fly fishing every summer.

I am a member and support the efforts and the following opinions of the “Stripers Forever” action group:

### **Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

### **Additional Commentary:**

We applaud the MA Division of Marine Fisheries and Acting Director McKiernan for

avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have. CEs are little more than a poorly disguised way for states to increase their share of the harvest and do so at the expense of the other states and more importantly to the detriment of the welfare of striped bass. This becomes especially egregious when, according to ASMFC scientists, the 18% mortality reduction mandate only has a 50% chance of successfully reversing the past 12 plus year free-fall in the decline of the quality and size of wild striped bass stocks. Those are unacceptable odds that every conservationist should be appalled by.

I hope you and your commission will take the right decisions to protect these amazing fish from commercial harvest (I think any commercial use is unacceptable under the current mortality and conditions). We all do not want to see the extinction of stripers in our New England waters.

Thank you for your good efforts on our behalf.

Sincerely,  
Sean Tracey

Sean Tracey

email: [sean@seantracey.com](mailto:sean@seantracey.com)

p 603/427-2800

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Portsmouth, NH 03801



**From:** [Erik](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** New rule proposals  
**Date:** Tuesday, February 25, 2020 8:29:10 AM

---

Greetings

I'm writing to voice my approval of most recent new striper commercial and recreational rule proposals.

Erik Parillo

Sent from my iPhone

**From:** [F Kudaruskas](#)  
**To:** [McKiernan, Dan \(FWE\)](#)  
**Cc:** [Silva, Jared \(FWE\)](#)  
**Subject:** Proposed Striped Bass Management Changes  
**Date:** Wednesday, February 19, 2020 1:07:08 PM

---

Dear Mr. Daniel J. McKiernan, February 19, 2020

My thoughts regarding your memorandum dated 12/13/2019 about Proposed Adjustments to Commercial Striped Bass Limits:

- I have no issues moving the start of the striped bass fishery to June 1 but, it will not help to fill the commercial quota because of the proposed increase in the size limit from 34" to 35". A large portion of the previous year's quota consisted of bass in the 34" to 35" range.
- Adjusting the commercial open days from Mondays and Wednesdays is a minor issue but Mondays and Thursdays worked very well.
- Increasing the minimum size from 34" to 35" is a major issue. The majority of bass that are caught in the vicinity of Nantucket Sound, Monomoy Island and Chatham are less than 35". Many fishermen, especially those that fish at night use live bait in the form of eels. Attempting to catch a striper longer than 35" is going to gut hook and kill many of the bass the agencies are trying to protect. I realize that the enforcement and compliance regulations somehow dictated the new 35" size limit but doing so will not help the commercial fishermen nor the striper population. The New York market is a very important commercial outlet helping to stabilize daily prices when an abundance of fish are harvested. With a 36" New York maximum size, there will be many less fish to ship.
- With a significant decrease in the quota, 25% in past years plus an additional 17 to 18%, the daily trip limit should also be reduced to 10 or less fish. The fishermen's effort will diminish saving fuel and decrease the dead discards while the price will probably increase.
- Commercial size regulations should have a slot limit comparable to but not necessarily equal to the recreation fishery, i.e. 30" to 35". If you believe that reducing the commercial size limits will somehow tempt recreational fishermen to purchase a commercial permit to keep more fish by circumventing the regulations for themselves two days a week, then close the commercial fishery to new applicants. As an alternative, you could use the established control date on striped bass endorsements to limit the amount of outstanding permits. This slot limit will have a high probability of fulfilling the quota. It is a non-issue this year for one would have had to obtain a permit by the end of February.
- With a 35" minimum size limit, you are mandating the commercial fishermen to take only the larger more fecund breeders. That is certainly not good for the species and could increase the animosity towards commercial fishermen.
- With a slot limit, gaffing could be outlawed. Stripers can safely be netted.
- Mandate the use of circle hooks.

I have been a commercial fisherman for 30+ years and hopefully my comments will be considered and be able to ensure an abundant and sustainable important species.

Thank you for your considerations,  
Frank J. Kudaruskas  
P.O. Box 647  
East Dennis, MA 02641-0647

**From:** [David Nash](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Silva, Jared \(FWE\)](#)  
**Subject:** Proposed Striped Bass Management Changes  
**Date:** Monday, March 9, 2020 2:56:18 PM

---

Attn. Acting Director Daniel McKiernan

Proposed draft regulatory amendments to 322 CMR §§6.00

These comments are filed in response to the public comment period regarding the proposed **Striped Bass Management Changes** for 2020.

As a recreational fisherman, I support the changes to protect Striped bass stocks. My hope is that monitoring of striped bass fish stocks continues to determine the effectiveness of these changes. It is obvious that states up and down the Atlantic coast are attempting to provide access to this resource to many different parties including recreational, for-hire and commercial. Many fishermen, including myself, would probably prefer a complete moratorium so as to allow for a more rapid recovery of striped bass stocks. I am concerned that the slot limit will only serve to move problems with breeding stock into the years ahead i.e. by creating gaps in the breeding population. Close monitoring by regulatory authorities of the impact of these changes may help to gain more knowledge of effectiveness.

With regard to the specific regulations, for recreational and all other users, fish mortality has finally been recognized as an issue. Requiring circle hooks and prohibiting gaffs will help but mortality is also increased by excessive measuring, photographing and handling in general, notwithstanding the need to measure to determine size. Holding up a bass for that photograph or to simply display it to on-lookers stresses fish and increases mortality. Catch and Release tournaments which do not specify immediate release encourage all of these potential abuses. I would suggest that DMF specify "immediate release" of all fish which are not going to be legally taken or which are mandated for release. "Immediate release" should be defined as immediate, without delay and which do not cause increased damage to the fish.

I would also suggest that a commercial slot limit be considered to further protect the larger of breeding age bass. While there might be a benefit to spreading out the allotted catch among bass of any size, perhaps the largest fish should also be left alone to further encourage recovery of the stocks.

Thank you

David Nash

PO Box 3254

35 Deacon Vincent Way

Edgartown, MA 02539

**From:** [C. J. Frankiewicz](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed Striped Bass regulations  
**Date:** Tuesday, February 25, 2020 8:18:11 AM

---

Acting Director Daniel McKiernan, please take these comments to heart with regard to the proposed Striped Bass regulations.

### **Comments On Proposed Regulation Changes:**

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, “I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong.” -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial “part-timers” (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
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### **Additional Commentary:**

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Thank you,

C. J. Frankiewicz

*You May Say I'm a Dreamer But I'm Not the Only One.*



**From:** [Rick Hickox](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 MA Striped Bass Regulation Proposals  
**Date:** Sunday, March 1, 2020 9:04:29 AM

---

Mr. McKiernan:

I'm writing to express my support for the positions taken by Stripers Forever regarding the proposed regulations to help preserve striped bass stocks. It is critical for all states to take significant steps to reverse the long decline in numbers and quality of these fish. Specifically, I support the following comments:

1. We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.
2. We feel that what is commonly referred to as the "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. Dead is dead no matter by whose hand.
3. We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting. However, as Brad Burns, Pres. of Striper Forever reminds us, "I think that given the current problems with striped bass, that there should be no harvest by anyone of large stripers. MA still plans to kill ¾ million pounds of these large breeders. It is simply wrong." -B.B.
4. We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial "part-timers" (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.
5. Missing from the Commercial Striped Bass proposals is any mention of requiring all commercially harvested striped bass to be tagged at point of capture (like all other states do). We strongly feel that by only requiring tagging until point of sale (back on shore.... if at all) the Division is being complicit in and encouraging the undisputed existence of an extensive illegal, black market in the sale of wild striped bass. This is harmful to legitimate commercial fishermen and to the welfare of the already depleted wild fish stocks.

Thank you for working to preserve this fishery.

Sincerely,  
Rick Hickox

**From:** [Randy Sigler](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Re: Comment on public hearing items  
**Date:** Monday, February 10, 2020 11:22:59 AM

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Sorry ... Typo correction ... in red below :)

R

On Feb 7, 2020, at 4:42 PM, Randy Sigler <[Randy@Striper.com](mailto:Randy@Striper.com)> wrote:

Dear Director McKiernan,

The following are thoughts regarding the upcoming public hearing items.

### **1. Recreational Striped Bass:**

**A. Slot Limit:** I fully and enthusiastically support a slot limit of 28" - 35". As a charter operator running over 800 trips a season for striped bass, this slot limit will dovetail very well with the conservation ethic we embrace, and make it mandatory that the large, breeding females be released. I do **not** foresee any negative consequence for our business due to adopting this new approach.

**B. Circle Hooks:** I fully support a circle hook requirement for all natural bait fishing for striped bass. Again, I see this complementing our conservation goals, and do not foresee any negative consequences by implementing this requirement for all sectors, including for-hire.

**C. Non lethal devices:** Yes ... fully agree with this proposal !!!

**2. Recreational Bluefish:** I fully support reducing the recreational Bluefish bag limit. Three fish per day is plenty for any recreational angler to harvest. I would also fully support adopting the three fish bag limit for for-hire anglers. Furthermore, I would support a vessel limit ... say 6 or 10 fish? In our North Shore waters, bluefish have been quite scarce the last few years. When they are present, it is generally very easy to put many fish in the boat. Bluefish does not store or freeze well, and we advise clients to take only what they can eat fresh (or smoke) that day ... and one or two fish is generally more than enough for them.

**3. Commercial Striped Bass:** In support of all proposed changes.

### **7. Commercial Menhaden:**

**B. Replacing 1,000 lb "incidental" limit:** I am uncomfortable with this replacement. I do understand the value of this fishery for the local lobster fleet, however, I believe this provision creates an unenforceable dilemma. Last year, after the 6,000lb limit was triggered, we continued to see "small scale" purse seiners netting menhaden in large quantities. The typical approach is that the vessel would make a set over a large school of Menhaden, and fill the net. They would then load the boat first (typically into a hold or into a partitioned portion of

the deck ... NOT into boxes), and then anchor with the net (still very full) tied alongside the boat. At this point, the lobster boats would come along the other side and take barrel after barrel of bait from the seiner. During lulls, the seiner would load more bait from the net onto the boat.

This creates several enforcement problems. One is that there is no way to measure the quantity of Menhaden that has been retained, or how much has been sold. Additionally, in the absence of enforcement present, the seiner can keep "live" bait alongside the boat replacing what they have sold in order to keep the "retained" portion within range.

I spoke with M.E.P. officers last year during the 6,000lb limit time, and they concurred that it was not something that they could/would check.

I would prefer that once the harvest has reached 100% of quote, that the "incidental" limit remain at 1,000 lbs.

**8. Sand Lance:** I fully support a limit on sand lance harvest. The sand lance represent an incredibly important forage fish for all of the valuable commercial species that we pursue recreationally and commercially. This type of forward thinking protection is exactly what needs to happen. Thank you for this!

As always, a big thanks to all DMF staff for their tireless dedication to protecting and managing the marine resources of the Commonwealth.

Sincerely,

Randy Sigler  
Sigler Guide Service  
1 Peabody Ln  
Marblehead, MA 01945  
[www.Striper.com](http://www.Striper.com)  
[randy@striper.com](mailto:randy@striper.com)  
617-459-1798

## Reed, Story (FWE)

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**From:** Jared Auerbach <jared@redsbest.com>  
**Sent:** Monday, March 9, 2020 2:43 PM  
**To:** Reed, Story (FWE)  
**Cc:** Rory O'Donnell  
**Subject:** Red's Best feedback

Hi Story, here are our thoughts (in general we support the longest possible season while still making sure we fill entire quotas)...

Black Bass -

Feel very strongly this should start earlier and go later. We are only for increases in weekly total landings in as much as it ensures the full harvest of the quota.

Striped Bass -

Fine with the proposed rule. Would like to double check that the math supports that we will still harvest full quota.

Fluke -

Fine with the proposed rule. Would like to double check that the math supports that we will still harvest full quota.

Thank you very much.

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**Jared Auerbach**  
Chief Executive Officer

Mobile: 1 617 413 4981 • Fax: 1 617 428 0030 • [jared@redsbest.com](mailto:jared@redsbest.com)  
WildFish LLC • 37 Boston Fish Pier, Boston MA 02210  
[www.redsbest.com](http://www.redsbest.com)



**From:** [MARY SOBEL](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** reply to opinion  
**Date:** Thursday, February 13, 2020 7:27:05 AM

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why cant we let the fish get bigger and reproduce i know we need to feed the masses but the sharks are shore lining because its easier to feed closer to shore i would say there is no fish at sea for the sharks to feed on the oceans are thinning out i know if we dont get them some one else will i know donnie on u tube following the trawler and 5 miles of dead scup and diferent fish the usa and other countrys need to down size i wonder how much is waste there rely is at 2000 lb i know nothing goes to waste fertilzer bait the last time i fished flounder middel ground they were small under the limit 14-16barely 2000 s i fished out there in the 80s on up into adult hood the avrage was 20 inches i havent heard of aney door mats latley eather +same with sword fish the avrage was 12-- 16 ft no more 16 foot sword fish so i think there should be a odd yr and a even yr to fish long line all hands one year then a net the next year the fish need a system to survive and reproduce and they wont thrive if we keep on them the way things are ive been hoping to hear the herring and the cod coming back i dont hear mutch about them

also when it comes to wet suits swiming surfing it seems to be a decoy for sharks i was told that sharks wont attac a diamond patern yes i think people should paint on or tattoo a diamond patern on there suit or legs s

thank you thats what i think

Carl A sobel west tisbury

**From:** [Gary M](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stop early Striped Bass harvesting  
**Date:** Tuesday, February 25, 2020 8:50:25 AM

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I do not support moving up the date to begin commercial harvesting of Striped Bass. Do not do it.

Gary Morrissette  
Londonderry, NH

James santapaola

25 Highland St Gloucester Massachusetts

3-4-20

My name is James Santapaola Sr, I am a commercial fisherman out of Gloucester Massachusetts. I have recently obtained a menhaden endorsement with my son. We now have a lot of money invested in the permit and for the menhaden endorsement, we also have a lot invested into the gear has well and time. When we purchased we were never notified at any time that there was a control date. This control date would be very unfair to us. The menhaden fisheries seems to be thriving better than it has in recent years, I don't see a need for a control date at this time.

A handwritten signature in cursive script that reads "James Santapaola Sr". The signature is written in black ink and is positioned below the main body of text.

3-2-2020

Public comment to 2020 menhaden management proposal

Hello I'm am Andrew Santapaola I am a commercial fisherman out Gloucester Massachusetts. I recently just obtained a menhaden endorsement on a permit I have just purchased late fall of 2019 and plan on seining menhaden, I have a lot invested in the permit and gear now and would like to ask if we can move the may 2020 control date that the Massachusetts dmf has mentioned to a later date. The date of may 1 2020 doesn't give anyone much of a chance to land any menhaden for this date. If we could push it a couple months till July or august it will be a more fair chance to get landings for this date.

I am also suggesting that the dmf take action to extend the menhaden season so it will last into the fall buy making a smaller daily limit or a weekly cap or a seasonal sub quota, this will be more beneficial to the local lobster industry has well has not waste the product buy the vessels having to ship them all out of state or sending it off to be fertilizer.

Andrew santapaola captain f/v Gannet II

A handwritten signature in black ink, appearing to read 'Andrew Santapaola', with a long horizontal flourish extending to the right.



**From:** [captainwen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass , cod and Atlantic menhaden collapse ....by statisticians not biologists  
**Date:** Tuesday, February 25, 2020 10:01:41 AM

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Hello,

The quotas , that for decades have destroyed the menhaden population in the north east are also killing the striped bass population. Striped bass eat menhaden anytime the menhaden is available. The so-called mathematical model used to manage the menhaden is adjusted ad lib by the ASMFC and NMFS staff statisticians to maintain these outrageous quotas on this critical species of forage fish. The “ model” is modeling nothing. Remember ? ..... we had wonderful mathematical models for the cod stock before it disappeared. The same fishing industry scientist and retired NMFS managers drove that mess, they are now off to drive the menhaden mess. You should wake the hell up!

Get off the stripers and close that foreign owned menhaden reduction fishery before our kids have nothing to catch but the occasionally seen sea robin.

**From:** [Al Williams](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Daniel.Mckiernan@mass.gov](mailto:Daniel.Mckiernan@mass.gov); [Armstrong, Michael \(FWE\)](#)  
**Subject:** Striped Bass / proposed changes to commercial fishery.  
**Date:** Monday, February 17, 2020 4:21:41 PM

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Dear Acting Director Mckiernan

I am a long time participant in the Massachusetts striped bass fishery, both commercially and recreationally.

Please accept my comments specific to changes proposed for this commercial fishery.

1. I support whatever commercial quota reduction that is necessary to meet conservation targets.
2. I support the proposed commercial size increase to 35 inches.
3. I do not support an earlier opening to the commercial season.

The proposal to move the opening of the commercial season from June 23 to as early as June 1 gives unfair advantage to commercial participants in the southern half of our state.

In my opinion, early June has not given the major pulse of migrating striped bass sufficient opportunity to equally distribute throughout the state and up through the north shore.

In early June there are major aggregations of striped bass in Buzzards bay and south cape waters. This will give commercial participants in those areas early access to significant harvest

opportunities while fishermen from Boston north are still waiting for numbers of migrating stripers to arrive.

I favor keeping the current opening date at June 23, thus allowing equal opportunity for all commercial participants throughout the waters of the Commonwealth.

Thank you for consideration of my comments

Al Williams  
5 Orchard Way  
Gloucester, Mass. 01930

Email: [al.nightshift@gmail.com](mailto:al.nightshift@gmail.com).

**From:** [Shawn Tibbetts](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass comment  
**Date:** Saturday, February 8, 2020 6:19:26 AM

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Mr McKiernan

As a full time fisherman, I would urge you not to increase the commercial striped bass season. Stripers are in trouble, that is an indisputable fact. Stocks are low and show no signs of recovering soon. Anything that can be done to protect this resource and give it the time to recover should be considered. Please do not exacerbate the problem by increasing the pressure on an already taxed population.

Thank you for your time and consideration.

Sincerely,  
Capt. Shawn Tibbetts  
207-502-0368  
MaineTunaFishing.com

**From:** [Vetcraft Sportfishing](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** striped bass comments  
**Date:** Tuesday, February 25, 2020 1:52:45 PM

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I would like to submit the following comments.

We should promote regulations that are likely to be the most successful to replenish the striped bass stock. The mandatory circle hook requirement should apply to both recreational and commercial striped bass fishing to reduce discard mortality in both sectors. This regulation would produce no harm to either industry, as circle hooks (non offset) catch well and would reduce deep hooking quite a bit.

Secondly, I am not in favor of moving the starting time forward for the commercial sector. We need to make sure the fecund females have their greatest chance to spawn before potential harvest. The stock has little chance of rebuilding if the most valuable breeders are not protected during spawning season. I would also be in favor of postponing the recreational catch till after spawning activity is completed.

Dr Harvey Yenkinson

**From:** [Germain Cloutier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Commercial season  
**Date:** Saturday, February 15, 2020 12:40:07 PM

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Hello,

I strongly urge you to NOT open the commercial fishing season for striped bass Early this year. I know that the proposal is to open it June 1st rather than June 23rd. This would not be in the best interest for the declining striped bass numbers and the recreational anglers that contribute way more funds in the striped bass fishery than the commercial sector. I understand that the past few years Stripedbass harvest quotas for commercial catch haven't been met. Adding days on the back end of the season which has been done for the past years really has not yielded much of a catch to add to the desired quota. So in summary adding days to the start of the season would be detrimental to stripedbass in Massachusetts and to the surrounding states as well. Please DO NOT approve this proposal.

Thank you,  
Germain

[Sent from Yahoo Mail for iPhone](#)

**From:** [Kayak Fish New England](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass commercial season  
**Date:** Tuesday, February 25, 2020 10:42:53 AM

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Please reconsider the opening date of the season . Honestly I feel it should be shut down all together until the fish rebound . Thank you mike baker  
Sent from my iPhone

**From:** [john herrick](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass management  
**Date:** Thursday, February 13, 2020 8:11:35 AM

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Good morning,

I appreciate the efforts to protect the striped bass stock. I am a commercial permit holder. The only change I am confused with is the reason for the daily commercial fishing change. As striped bass is a seasonal specialty on local restaurant menus around the Massachusetts coastal communities, wouldn't we want the freshest fish available to our restaurants for the weekend? A Wednesday commercial sell day seems like we are moving further away from the fish consumption date on the weekend menu. Any other reason for this change?

Thank you,

John Herrick

**From:** [Riptide Charters](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Proposals  
**Date:** Friday, February 7, 2020 3:40:01 PM  
**Importance:** High

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Dear Acting Director Daniel McKiernan,  
Regarding the 2020 Public hearing notice,

I support all of the current striped bass proposals for the recreational sector.

Regarding the Commercial striped bass sector,

I support the 35" minimum size to eliminate overlap with the recreational sector.

I DO NOT support the changing of the start date of the Commercial season to any date earlier than June 23rd. There is already chaos at the local boat ramps and on the fishing grounds during the commercial season. Opening up an additional 3 weeks would only serve to further disrupt the fishery for the vast majority of the recreational and charter anglers.

I support the bluefish proposals.

For Commercial Sea bass I support the following proposal a. Adjust fishing limits for the summertime directed fishery. DMF's preference is to maintain the existing season and Sunday/Tuesday/Thursday open fishing day schedule, but increase directed fishery trip limits from 300 pounds to 400 pounds for pot fishermen and 150 pounds to 200 pounds for hook and line fishermen.

Respectfully

Thanks,

Capt. Terry Nugent  
Riptide Charters  
[www.riptidecharters.com](http://www.riptidecharters.com)



**From:** [Mark Remlinger](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regulations for 2020  
**Date:** Saturday, February 8, 2020 5:00:18 PM

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To: Acting Director Daniel McKiernan,

I would suggest moving striped bass in 2020 to a recreational sport fishing status only, release only. No keeping of or possessing by any angler commercial or recreational.

Mark Remlinger

**From:** [trout21](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Tuesday, February 25, 2020 11:37:12 AM

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I support the comments submitted by Stripers Forever

Gaffing should be eliminated. A gaffed bass is a dead bass. The decision to eliminate the gaff for recreational fishermen is a good idea. I do not understand the logic of exempting commercial fishermen.

I strongly oppose moving the starting date for commercial season up to June 1. The fact that there is a problem achieving the quota should be an alarm going off. If the striped bass mass is so depleted that the commercial fishermen cannot achieve the quota under the historical beginning date, should confirm the need to harvest less fish. Similarly changing the days of the week for commercial fishing should not be changed.

Circle hooks should be required for all forms of bait fishing.

Most importantly, I do not see the logic of allowing the commercial fishermen to delay tagging their caught fish to point of sale. This only serves to allow the bad apples to exploit this policy.

Sent from [Mail](#) for Windows 10

**From:** [cod40ken@aol.com](mailto:cod40ken@aol.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass regulations  
**Date:** Sunday, February 9, 2020 12:09:23 PM

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I have read the proposed (2020) alterations to Striped Bass fishery regulations up for discussion.

I can see from your proposals some good intentions for the management of the striped bass fishery.

Whilst the introduction of the slot size limit is good step forward, the protection and consistency of the long term future for striped bass lies with understanding what is the key part of the Striper population.

Your fishery management scientific team can confirm which range of fish form the core breeding stock which needs protection, This should be used to determine the optimum take-able catch size of fish, both commercial and recreational. Tinkering with size limits and season dates need to be considered against breeding patterns and species maturity.

I have difficulty in understanding the logic regarding "Commercial licences". There is some integrity in the allowance of a commercial licence for those whose livelihood is dependent upon fishing and that would include those full time boat operators who cater for recreational anglers.

The abusive situation that is the issue of a "commercial licence" to anyone paying the token price serves no purpose. A commercial licence can be used to funnel recreationally caught fish so that an individual generally meets their individual allowance. The fish taken will generally be mature females.

Whilst the prediction by fisheries management as to the Quota for each year is one which should be sustainable, it is a guesstimate based on a number of factors. Is there a published paper which identifies catch rates and how the quota is arrived at? Income from the catch will remain steady when a quota is reduced, as market value will fluctuate to reflect available landed fish.

Regards Ken Robinson

***As a regular visitor to MA I have been communicating with angling interests in the State regarding concerns about the striped bass population. (please see below my response to an Cape editor from last year)***

*How do we support and improve the Striped bass fishery on the Cape.*

*After spending six weeks on the Cape and having spoken with a number of the finest local anglers, particularly on the Canal There appears to be a general consensus that this has been one of the poorest years for quality fish since the striper recovery.*

*There appears to be a healthy stock of juvenile fish this year and plenty of fish around the legal size limit.*

*The Striper is obviously a major revenue fish for the State of Massachusetts and other States. Having experienced the best the Cape can offer and also witnessed the abuses that accompany those periods of big fish runs, one questions the logic of how the fishery is currently managed.*

*Anglers openly take more than one fish per day, often secreting fish in their vehicle or the bushes and then returning to take further fish. Undersize fish are also taken. Some anglers will report these events, but they are in the minority. The indigenous population seem to have the ability to take fish without consideration of numbers or size.*

*Worst of all is the so called "commercial licence which encourages anglers to go out and take the largest fish to the limit of their legal catch number. Anglers will ditch a moderate fish for a much larger fish when their limit has already been achieved.*

*The increase and extension of the commercial harvest because the Commercial quota has not been achieved seems short sighted. Is it possible that the reason for under achievement was caused by a flawed analysis of projected fish stocks. Superficially the trend appears to indicate a decline, 2017 a bumper year, 2018 a good year 2019 less than average year.*

*When you consider that most of the big fish are actually females and therefore the brood stock, it is easy to see the potential for disaster if controls are not exercised. Whilst there a limited number of fishery protection officers a more targeted approach may give better control, than generally just relying upon a presence.*

*There are probably a number of sensible options for future management. Here are a few suggestions for consideration.*

- *Maybe the introduction of a slot size would help sustain the fishery.*
- *Remove commercial licences. Marginally increase the standard licence rate to balance the states revenue for the loss of the commercial licences.*
- *Make Cape cod canal a catch and return venue.*
- *Increase the penalties for intentional illegal actions.*

**From:** [Robert Woods](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Friday, February 7, 2020 4:34:29 PM

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Good day

I hope you consider something for anglers who catch a trophy bass. Maybe a slot limit that would allow you to keep a bass over 50 inches. At that size they have lived a full life and reproduce plenty of times.

Thank You  
Robert Woods

Sent from my iPhone

**From:** [ejmerchant@charter.net](mailto:ejmerchant@charter.net)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Tuesday, February 25, 2020 12:36:43 PM

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Please do the right for the sake of future generations. I agree with Stripers Forever, even though I rarely get to fish for strippers. But, I sure do want my grandson to have that opportunity. Thanks.

*Sent from my Verizon LG Smartphone*

**From:** [Dean Clark](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass  
**Date:** Tuesday, February 25, 2020 11:36:15 AM

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Director McKiernan,

According to scientists at the ASMFC, **the mandated 18% reduction in the harvest of stripers only has a 50% chance of being successful** in the recovery of this currently overfished stock. This also means that it has a 50% chance of failing.

Given these sketchy odds why are we intentionally making it easier to kill off even more off these fish? **Massachusetts is purposefully targeting nearly 3/4 million pounds of breeding female striped bass for harvesting!** How can rational thinking folks endorse such irrational decision making?

**It is time to institute regulatory changes designed to put the welfare of the fish ahead of the short-sided demands of commercial harvesting interests.**

A good and reasonable start would be to:

- 1) **Have the circle hooks and no gaff rules apply to everyone** - commercial and recreational.
- 2) **Do not allow for any earlier opening of the commercial season** as it will further deplete the already overfished stock of large breeder female bass that are transiting through our coastal waters.
- 3) **Do not change commercial open days to Monday and Wed.** as it will further encourage quasi-commercial (recomercials) and out of state anglers to take advantage of our liberal commercial striper licensing/harvesting regulations and make it more difficult for legitimate commercial fishermen to catch their daily limit.

Additional comments: **require that commercially harvested fish be tagged at point of capture** not point off sale which everyone knows is allowing for a substantial black market in untagged and therefore unreported female breeders.

Thank You,  
Dean Clark  
596 Franklin St  
Duxbury, MA  
508 769-9765

**From:** [Bradford Burns](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** striped bass  
**Date:** Tuesday, February 25, 2020 8:38:14 AM

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Acting Director Daniel McKiernan

I believe that continuing the commercial fishery for large striped bass is completely wrong. This fishery should have ended a long time ago, and it certainly should end now. The last thing that anyone should consider is any measure that will increase the mortality on large striped bass. No earlier fishing dates that will just keep more part timers in the game, no exemption for circle hooks or the use of gaffs in the commercial fishery should be allowed.

Brad Burns  
18 Merrill Rd.  
Falmouth, ME 04105



In reference to the proposed commercial fishery ban for striped bass (as reported by the Cape Cod Times on Sunday 01/14/2018) I submit the following catch report information as relevant to the debate as to who are the primary beneficiaries and whether striped bass should be taken “off the menu”:

Pursuant to my Freedom of Information request to the Massachusetts Division of Marine Fisheries (DMF) in January 2018, I was furnished with database statistics for “MA Striped Bass Fishery Permit Activity and Landings, 2016-2017” (Table 1)

(Table 1)	<u>Year</u>	<u>Active Permit Holders</u>	<u>Total Lbs</u>	<u>Lbs by top 10%</u>	<u>% of Total</u>
	<u>2016</u>	1339	997,894	373,357	37.41
	<u>2017</u>	1389	825,880	337,339	40.85

As demonstrated by (Table 1), the top 10% of all commercial bass permit holders (or about 134 fishermen) caught over 37% in 2016 while in 2017 the top 10% (or about 140 fishermen) caught over 40% of total catch in pounds.

DMF furnished additional statistics for both years indicating the total catch by all permit holders in 10% increments as shown in Table 2 and Table 3.

(Table 2)	<u>Year</u>	<u>% of Permit Holders</u>	<u>% of Total Catch</u>
	<u>2016</u>	1-10%	37.41%
		11-20%	20.42%
		21-30%	13.41%

(Table 3)	<u>2017</u>	<u>% of Permit Holders</u>	<u>% of Total Catch</u>
		1-10%	40.85 %
		11-20%	20.12%
		21-30%	12.54%

As demonstrated by (Tables 2&3), the top 30% of permit holders (or about 401 fishermen) caught over 71% of the total catch in 2016 and in 2017 the top 30% (or about 416 fishermen) caught over 73% of the total catch.

DMF also supplied other requested data concerning the percent of commercial sized fish (34 inches and above) that are female. Using a commercial sampling known as “Syke Method”, since 2004 the percent of female fish equal to or greater than 34 inches averaged at close to 98%. Perhaps a better determination of sex was accomplished by DMF by dissecting each fish although it was a much smaller sample size. Using this method for fish sized 34-40 inches the percent female was still nearly 89%. Both studies reinforce a common understanding that most big striped bass are females, each containing a million or more eggs. A 12 lb female carries an estimated 850,000 eggs while a 55 lb female can have as many as 4,200,000 eggs. These big fish are being eliminated from the breeding population by commercial fishing by a million pounds annually in Massachusetts alone.

Although additional information on fish mortality was requested, DMF was unable to comply because no data on the number of sub legal striped bass released by commercial fishing is reported. One estimate from 2009 put the number of released fish at 69,060 compared to a harvest of 59,666, but that estimated could be biased. It is logical to assume that the number of sub legal sized commercial fish (<34") hooked and released is at least equal to, or greater than, the number of harvested fish. The release mortality rate is difficult to calculate. A commonly accepted figure is 9%. One study in the Hudson River established a release mortality rate of 14% (including 5% for circle hooks and 16% for J hooks). Some charter boat fishermen believe the number is closer to 30%. But whatever the mortality rate, it is not included in the annual fish harvest reports.

Further contributing to mortality rates are the illegal practices of "high grading" and "stockpiling" of striped bass by some fishermen. High Grading is the practice of releasing dead striped bass in favor of subsequently caught larger striped bass (there are quotas on the # of striped bass you can catch per commercial day). Stockpiling is the practice of catching striped bass on days not allowed by fishing regulators for sale on subsequent allowable days, or for sale out of state. To be clear this is not an indictment of the entire commercial fishing industry because I believe most play by the rules. But it does happen often enough to contribute to a skew in harvest reports. And recreational fishermen are not immune to some of the same unethical and illegal practices, as well as poaching, if we can depend on reports from the Cape Cod Canal region last summer.

I am not trying to pick a fight with commercial bass fishermen. " Science "apparently is on their side and the fishery is being regulated. Since transparency is the buzzword these days I, too, have a commercial rod and reel permit with an endorsement for striped bass and I have enjoyed commercially fishing for striped bass in the past. But, I now support the movement for making striped bass a recreational fish. Commercial bass fishing benefits relatively few permit holders while recreational fishing is more valuable to the economy, and more equitable to the majority, and more sustainable to the fishery. There are perhaps thousands of recreational fishermen in MA competing during a very short season, for one of the few real gamefish we have in New England saltwater. Unlike Florida, which has dozens of gamefish species, Massachusetts has few like bluefish and a fall run of false albacore and bonito, but striped bass is still the prize.

And I question the science that tells us that bass stocks are not in danger. Just about every species fishing regulators have tried to manage during my lifetime has crashed including cod, flounder, haddock, weakfish, and yes striped bass. Fish are cyclical and spawning success is a variable difficult to manage and control. For example, there were very low numbers of striped bass at the end of the 19th Century which could not have been because of overfishing. We experienced another crash during the 1980s when anglers went entire seasons without catching a striper. To further illustrate the vagaries of spawning stock there are now serious concerns about the serious decline of the bluefish population along the East Coast over the past 10 years. So altogether it makes me doubt the wisdom and sustainability of intentionally removing so

many bass collectively carrying trillions of eggs from spawning again for sake of the privilege of paying \$15-20 a pound for fresh striped bass for two months every summer.

Finally, I also challenge the way recreational striped bass fishing is managed in Massachusetts. While I can appreciate the rationale of the 28" minimum size for spawning purposes the corollary is that fishermen may catch and release a hundred or more smaller fish before landing a "keeper". With the aforementioned mortality rates this type of fishing in mind this regulation does not make sense for sustainability. I would submit that a one fish 18" minimum would satisfy the requirements of most recreational fishermen.

David L Clark  
Waquoit, MA  
508-495-903





**From:** [Amberson, Jeff \(US\)](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Regulations - proposed changes  
**Date:** Friday, February 7, 2020 4:23:27 PM

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Mr McKiernan

As a lifelong resident of the Commonwealth and avid sportsman, I would urge you not to increase the commercial striped bass season. Stripers are in trouble, that is an indisputable fact. Stocks are low and show no signs of recovering soon. Anything that can be done to protect this resource and give it the time to recover should be considered. Please do not exacerbate the problem by increasing the pressure on an already taxed population.

Thank you for your time and consideration.

Jeff Amberson  
Northborough, MA

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**From:** [Steve Lempitski](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Regulations  
**Date:** Sunday, February 16, 2020 11:38:11 AM

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How about imposing a season? I see many fishermen throwing lures with double trebles at 15 inch school bass in coastal rivers starting in March and through April. This should be illegal, with only open ocean fishing allowed until May 1st.

Steve Lempitski  
508-566-4735

**From:** [Peter A. Viau](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stripers  
**Date:** Tuesday, February 25, 2020 3:18:38 PM

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Please close the Striper harvest to recreational and commercial harvest until the species covers from the depressed stocks.

Make the Striper a recreational game fish with no commercial harvest. It will pay significant dividend to the recreational, tourism, boating, and tackle industries. Regards Peter A Viau



**From:** [Garrett Hauck](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stripped Bass Management  
**Date:** Monday, February 17, 2020 1:08:14 PM

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Hello Marine fisheries Management Team.

I am excited to see that a size bracket is being discussed for the stripped bass. I remember as a child the limit being 32" and the following years seeing a lot more fish of smaller size. In recent years I have noticed a decline in large fish. I do not keep a lot of bass, maybe one every couple weeks around 30". There were days this summer where we caught a few(2-3) 20-30lb fish. The summer before there were trips where we caught over a dozen fish close to 40"

The year of 2017 I could catch all the 40" bass I wanted consistently. 2019 was not a good bass year, I really had to work hard for them.

I cant blame this on the commercial bass fishery , but it does not help the problem. This industry / regulations promote targeting female spawning stripped bass. A bracket for stripped bass is essential for the survival of this species ( for commercial aswell )!!

I fish circle hooks exclusively and have great success , Why is it mandated that Rec. bass fishermen use Circle hooks yet commercial fishermen do not ? IT should be fair across the board!

set brackets for commercial and Rec. Make everyone use circle hooks !!

All of the commercial bass fishermen I have met "work the system" fishing off days .. keeping bass on ice , and even some boast about " grading fish" it makes me want to puke. I watched the striped bass fishery collapse on Marthas Vineyard. This was due to several locals fishing nonstop for stripped bass. Keeping these areas chummed consistently and fishing all night till the am then doing it again. Selling fish to restaurants, markets anyone they could.

Please help

Thank You,

Garrett Hauck  
617-869-7742

**From:** [casey webb](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Supporting Stripers Forever comments on 2020 striped bass regulations update  
**Date:** Saturday, February 29, 2020 4:31:41 PM

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Director McKiernan,

I'm writing to express my support for the comments given by the Stripers Forever group on the proposed 2020 updates to Massachusetts striped bass fishing regulations. Overall, I really appreciate your commitment to bringing down the mortality for this year but agree we could go further with simple steps like mandating use of circle hooks and no gaffs for all anglers as opposed to just recreational.

Thank you for taking the time to read my comments.  
Regards,  
Casey Webb

**From:** [ALAN GONSALVES](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** To: Acting Director Daniel McKiernan  
**Date:** Saturday, February 8, 2020 10:24:33 AM  
**Attachments:** [image.png](#)

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Dear Mr. McKiernan,

I would like to comment on the proposed recreational changes for striped bass and bluefish. My views are in line with most of the fishermen I know who, like me, fish 50-150 days each season. Almost all I have spoken with would support a catch-and-release fishery, but we understand that is highly unlikely. Instead, we would happily support any regulation that reduces mortality, including the current proposals. Concerning the current proposals, the ASFMC indicated that the intent was to protect the declining number of large breeders, which made sense until they suggested the larger size commercial range. Their argument lost all credibility.

In addition to the circle hook requirements, I would like to see a ban on treble hooks as well. I and others replace these lure hooks with singles and while we may miss a few, the release is safer for the fish.

I've included my log summary for my saltwater trips, mostly in the Plum Island area but includes the Rumney Marsh, Boston Harbor and Mystic River as well. It clearly shows the recent decline in large stripers. The trips include boat and shore fishing.

As for the bluefish, my log summary shows what we have been seeing in the Plum Island area for the past seven seasons. The Chesapeake Bay juvenile index data published by the Maryland DNR indicates a long decline. I would gladly give up keeping these fish until they rebound.

Given the added pressure on fisheries from warming seas, acidification and pollution, I believe we need strict regulations to preserve them.

Alan Gonsalves  
Melrose, MA

	SW Trips	Hours	Schoolies	Keeper Bass	Bluefish
1996	57	270	487	4	21
1997	57	207	459	-	21
1998	54	169	705	5	36
1999	57	163	595	-	17
2000	69	232	901	4	20
2001	62	197	778	12	16
2002	76	225	910	28	117
2003	71	162	412	30	65
2004	91	245	776	26	73
2005	94	206	899	22	76
2006	111	267	1,764	4	97
2007	110	277	1,756	36	185
2008	128	358	1,501	79	253
2009	100	259	757	52	200
2010	117	285	526	137	184
2011	86	197	316	159	84
2012	128	267	821	49	220
2013	125	214	731	90	5
2014	110	209	1,058	10	2
2015	67	111	239	8	3
2016	83	178	1,604	9	2
2017	118	223	2,310	15	-
2018	86	115	282	4	1
2019	100	149	524	7	1

**From:** [Jeff Giacomelli](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Winter 2020 Marine Fisheries Public Hearing Notice  
**Date:** Friday, February 7, 2020 3:40:51 PM

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Mr. McKiernan:

I read the proposed fisheries changes and writing as a recreational angler I favor the proposals outlined.

I believe limiting fish mortality and catch limits is important to preserving the fishery.

Thanks,

Jeff Giacomelli  
47 Thayer Rd.  
Mendon, Ma 01757

**From:** [ride603@gmail.com](mailto:ride603@gmail.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Tuesday, March 10, 2020 8:14:05 PM

---

To whom it may concern,

I am sending this email in regards to the proposed changes to the the commercial striped bass fishery. The need to increase the season for commercial anglers based on their inability to fill the quote is extraordinarily short sighted. The fishery is in need of conservation. I applaud your efforts to institute the use of circle hooks and do away with gaff use in the recreational sector. These fish draw me to your state where I regularly use my disposable income to vacation while fishing. The striped bass generates more revenue for the commonwealth via the recreational sector than the commercial. The fact that out of stater's can hold a Massachusetts commercial striped bass permit only fosters poaching in waters in my home state of New Hampshire where a fish can be taken and driven over the boarder and sold. Their are so few people that are earning there sole income off of this commercial fishery that is it worth the cost of regulation and enforcement that is put into it? I would not be against a select group of professional commercial fisherman harvesting within the quota. To allow out of state anglers who use the state of Massachusetts resource to justify to there wife the need for a bigger boat or new fishing reel to use and I'm sure abuse this resource taking valuable time and effort away from Mass EPO's seems like it is counter productive to commonwealth.

Thanks for taking a moment to read my rant and please reconsider extending the commercial striped bass season,

Dj Lovett  
Concerned angler

Sent from my iPhone

**From:** [Frederick Bogue](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass commercial  
**Date:** Tuesday, March 10, 2020 7:55:04 PM

---

I think the striped bass biomass is in trouble. This can be easily shown by the fact the mass. Commercial catch hasn't reached their quota lately. Extending their season goes against the principal of reducing harvest to protect the species

Sent from my iPhone

**From:** [Luis Tirado](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Commercial Season 2020  
**Date:** Tuesday, March 10, 2020 7:42:33 PM

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I would like to express my concern regarding the state of Massachusetts' proposal to start the 2020 Striped Bass Commercial fishing season on June 1, 2020 instead of the traditional start of June 23rd.

It is no secret that the Striped Bass stocks are in trouble, and that the commercial fishermen participating in the Striped Bass fishery have not been able to reach the predetermined quota for the past few years. Their inability to meet the quota should be evidence enough that the most conservative measures should be taken in order to regrow and bring the stock back to healthy numbers.

By adding additional days to the season you will only be putting a larger unneeded target on the very size class of fish that we are depending on to rebuild the fishery.

I am charter captain and I am strongly opposed to the motion to extend the Striped Bass Commercial Fishing season.

Captain Luis Tirado  
Owner  
Diamond Pass Outfitters  
207-899-5985



**From:** [Dave McCarthy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass commercial season change  
**Date:** Wednesday, March 11, 2020 6:27:33 AM

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Dear Sirs,

I am writing to let you know that I oppose allowing the commercial fishery too be opened earlier than current law allows. There are too many large fish still waiting to spawn at that early time that will be caught. Catching these egg laden fish will devastate the fishery for generations to come.

I would also ask that you please recognize the dollar value of the recreational fishery for stripers. There are thousands upon thousands of recreational fishers who spends millions and millions of dollars locally. These monies come from residents and nonresidents alike who fish for recreation.

Sincerely  
Dave McCarthy  
Sebago, ME

Sent from [Mail](#) for Windows 10

**From:** [Curt Jessup](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass commercial season  
**Date:** Tuesday, March 10, 2020 7:48:12 PM

---

We should not open commercial striped bass early. Striped bass are in critical decline and commercial season should be limited further or better yet eliminated all together!

Much thanks,

Captain Curt Jessup

Sent from my iPhone

Capt. Curt Jessup  
Broker  
Boston Yacht Sales  
145 Falmouth Heights Rd  
Falmouth MA 02540  
[capecodoutfitters@comcast.net](mailto:capecodoutfitters@comcast.net)  
508-400-5627

**From:** [M.B](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass commercial season  
**Date:** Tuesday, March 10, 2020 7:55:21 PM

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To whom it may concern,

I am writing you to let you know that opening your commercial season for striped bass in Massachusetts early as you have proposed to do will only hurt the fishing further north of you. These fish are migratory and they don't stop at the Massachusetts New Hampshire border as you know so if you guys open your season early during the peak of the migration north you are going to allow your commercial fisherman to kill all of the breeders and give them zero chance and only hurt the fisheries more. If you were up to me I would shut your commercial season down 100% for the next five years and then when you re-opened it you could see the most amazing striped bass fishery you have seen in your lifetime. It's only common sense. Mike Baker  
Sent from my iPhone

**From:** [Aaron Broaddus](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Fishery  
**Date:** Tuesday, March 10, 2020 9:31:09 PM

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Hi there!

I'm emailing you to voice my concerns about the current state of the striped bass fishery, not just in Maine where I live, but everywhere. It's the year 2020 and we understand the effects of over harvesting any type of fish. I don't understand if the catch rates are going down, why we're extending the harvest season. It seems counterintuitive and feels like there's some back door, wrong deal going on. If anything we should be making the harvest season shorter and limiting it to one fish over 48", past the size of most breeder fish. It's hard enough to enforce laws on the open ocean, and people are being unethical. Poaching is a serious, serious problem and also doesn't seem to be factored into this equation.

Please, for the love of GOD, do not extend this season, and consider going the other direction so that we can have a sustainable fishery for everyone to enjoy for decades to come. At this point, we'll be lucky to be able to even fish for schoolie sized stripers in 10 years. Figure this out, please.

Sincerely,

Aaron Broaddus  
[headinnorthguideservice@gmail.com](mailto:headinnorthguideservice@gmail.com)  
[www.maine-fly-fishing-guides.com](http://www.maine-fly-fishing-guides.com)  
207-838-8099

**From:** [Benjamin Burns](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass proposed change  
**Date:** Wednesday, March 11, 2020 7:41:13 AM

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To whom it may concern,

I have recently been made aware of the proposed change in MA to move the commercial fishing dates from a June 23rd start to a June 1st start date. We know the the Striped Bass fishery is in trouble. Why is this even being thought about? I may fish in MA once or twice a year but that is not why I am writing. I fish 3-4 times a week in Maine and this rule change will be detrimental to our fishery. We have just started to see the fishery come back to life in Maine and this will kill it again. All of the “keeper” size fish that come to Maine in the summer too forage will be getting killed on the way and will never give Maine anglers the chance to enjoy them. I urge the powers to be in MA to strongly consider NOT making this change and to try and enforce the most conservative conservation tactics possible to ensure that generations of anglers in all states can enjoy this wonderful fishery.

I appreciate your time.

Ben Burns

**From:** [Joe Lane](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass  
**Date:** Tuesday, March 10, 2020 9:32:04 PM

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I'm writing in hopes that you increase your conservation efforts on the striped bass instead of opening the season early to the commercial season. Years ago I traveled from VT to Cape Cod 8-12 weekends per year to fish for stripers. I usually hired a guide 3-5 days, rented a home for several weeks, or stayed in hotels, ate at restaurants, visited various shops, etc. I would even bring my entire family for a weekend or two. All totaled I would spend thousands of dollars on Cape Cod each spring and fall to catch and release striped bass. These days I don't go down at all. I didn't spend a single weekend last 2 years on cape cod or in the state of Mass for that matter. Why? Because the striped bass fishing is a shadow of what it used to be. These fish are in trouble and I see no reason to cast to empty waters. I still spend thousands chasing fish, I just do it somewhere else. I hope you consider the economic loss to the state the catch and release striped bass fishery contributed to the state. Many of my fly fishing friends are in the same boat as I am. Additionally, Mass regulations hurt the fishery for other states as well being a migratory species. Please end your commercial fishery for striped bass and let the species recover.

Thanks for you consideration.

Joe Lane  
Williston Vermont.

Sent from my iPhone

**From:** [Myles Culley](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper commercial fishing season  
**Date:** Tuesday, March 10, 2020 7:17:59 PM

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Please do not make the commercial season for Striped Bass earlier! We are all aware that the population is on the decline and we should be taking measures to reduce commercial fishing rather than increase it. Let's keep the population going strong for future generations!

Sincerely,  
High School Sophomore  
Myles

Sent from my iPhone

**From:** [Bill Dawson](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Season  
**Date:** Wednesday, March 11, 2020 6:48:58 AM

---

As a professional in the fly fishing industry whose business depends on and more importantly thrives on a robust Striper population that migrates up and down the east coast, I am concerned about the state of the striped bass fishery and believe a more conservative management approach is called for not less.

Best Regards,  
Bill Dawson  
WDawsons, Inc.



**From:** [Russell Therrien](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Saltwater fishing license  
**Date:** Thursday, March 12, 2020 6:19:29 PM

---

My wife and I applied for our saltwater fishing licenses online the same day. Hers showed up online and mine didn't.

Russell Therrien  
10 Paul St  
Auburn MA 01501

Sent from my iPad

**From:** [Tom](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Save the Stripers!!!!  
**Date:** Thursday, March 12, 2020 5:31:00 PM

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Acting Director Daniel McKiernan,

I would like to add my voice to my fellow recreational fisherman. I fish with my son out of a 16 ft Whaler in the Vineyard sound and am a long time resident of Massachusetts.

You need to give more consideration the 1,000's of individuals and families that enjoy recreational fishing. Enact fair regulations:

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [*J hooks kill no matter who is using them*]
2. The "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season [before July 1](#) is wrong. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. The proposed slot limit is acceptable [*the 18% harvest reduction is necessary*]

*Thank you.*

-----  
Thomas Wisniewski  
917-885-2616



P.O. Box 1230  
Marshfield, MA 02050  
[www.stellwagenbank.org](http://www.stellwagenbank.org)

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John Richardson

March 12, 2020

Daniel McKiernan, Acting Director  
Commonwealth of Massachusetts  
Division of Marine Fisheries  
251 Causeway Street, Suite 400  
Boston, Massachusetts 02114

**RE: Winter 2020 Marine Fisheries Public Hearing and Scoping Hearing for Summer Flounder, Scup, and Black Sea Bass Commercial/Recreational Allocation Amendment**

Dear Mr. McKiernan:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA) we offer the following comments to the fishery management measures presented at the Winter 2020 Marine Fisheries Public Hearing and Scoping Hearing for Summer Flounder, Scup, and Black Sea Bass Commercial and/or Recreational Allocation Amendment:

**Recreational Striped Bass (322 CMR 6.07)**, status quo as proposed with the exception that we recommend an exemption requiring the use of circle hooks by the for-hire and commercial fleet that represents small percentage of the striped bass mortality. The for hire and commercial fisherman are experienced in the use and the appropriate means and methods of different hook types as well as sound catch and release methods reducing mortality.

**Commercial Striped Bass (322 CMR 6.07)**, status quo as proposed with the exception that we recommend that dual commercial and for-hire permit holders be permitted to sell commercial conforming striped bass caught by their clients. Continued access to the commercial fishery by the recreational/for-hire fleet is consistent with the historical access by recreational anglers or the fore hire fleet to the commercial striped bass fishery in our waters. Such precedent is also found by properly permitted for-hire vessels that are provided access to the historical Bluefin tuna and swordfish fishery in our waters to commercially sell Bluefin tuna and swordfish.



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Marshfield, MA 02050  
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**Recreational Bluefish (322 CMR 6.18)**, as proposed to adopt state limits consistent with this coast wide mandate. We hope that the regulatory community continues to develop separate seasons/bag limits for the for-hire community (ex. Black sea bass, summer flounder, etc.) such as proposed for bluefish and already exists for scup, Bluefin tuna swordfish and other select species.

Based on our observations, bluefish are subject to an approximate 10 year cycle and what we are observing is not unexpected. The stock assessment is subject uncertainty that adds to concluding the poor status of the stock. As a result of the uncertainty we agree to the proposed bag limit of 5 (for hire) and 3 (recreational) as long as future measures don't result in lower bag limits since the scientific basis behind the proposed bag limits is not clear.

We also recommend no size limits in order to continue the snapper bluefish fishery for our younger anglers as well as the need for bluefish at a range of sizes for Bluefin tuna and mako bait.

The revised MRIP results have significantly impacted the for-hire fleet specifically as it relates to black sea bass and summer flounder. As a result the SBCBA recommends that the following fishery management matters or measures be considered to assess fish landed by the for hire fleet for fishery management purposes as summarized below.

- Review of for hire landing data dating back to the 1980s to assess an historical perspective of what was landed and how that has changed over time to provide a more equitable share of the quota or ACL.
- Consider the transfer of quota and/or the ACL for select species between commercial/recreational sectors to maintain the annual totals below regulatory thresholds.
- Use of a Massachusetts specific black sea bass dead discard percentage of 5% instead of 15% for use to develop Massachusetts seasons and bag limits consistent with conditions in our shallow waters. We have tremendous numbers of black sea bass in our waters and release smaller legal size fish target adult males only. As a result the 15% threshold artificially increases the assumed



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dead discards not representative of our tremendous number and size of black sea bass in our waters landed in shallow waters.

- We recommend that state permitted for hire vessels be subject to mandatory reporting using eVTRs that is used to assess more than effort to manage the for hire landings and releases.

Thank you for your consideration of this important matter.

Very truly yours,

*Paul Diggins*

Capt. Paul Diggins  
SBCBA, Vice President  
captain\_paul@bostonfishing.com

Cc: Ron Amidon, Mass F&G

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**From:** [Kyle Schaefer](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Comments  
**Date:** Friday, March 13, 2020 10:23:01 AM

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Acting Director Daniel McKiernan,

Thank you for the opportunity to comment on proposed changes to the management of our shared marine resources. I am a charter captain and protecting these fish are vital to the health of my business.

Striped Bass:

- I support the proposed changes
- I support the requirement of circle hooks to reduce mortality
- I support the use of non-lethal devices for removing striped bass from the water

Bluefish:

- I support the lower creel limit for bluefish

Commercial Striped Bass:

- I strongly disagree with extending the commercial striped bass season in an effort to maximize the quota that hasn't been fulfilled because there are so few striped bass present. If anything we need to more conservative to protect these breeder bass so we can all enjoy more fish in the future. Let's invest in the future for us all.
- I support the adjustment in days allowed to fish
- I support the 1" increase in size limit to avoid conflict with rec and commercial fishing for striped bass

Thank you for your time and for noting my comments.

Best,

Kyle Schaefer

603.969.3050

[Soul Fly Journal](#) || IG: [@SoulFlyOutfitters](#)

[ASGA Board of Directors](#) || [T&T Ambassador](#) || [Simms Ambassador](#)

[AMFF Ambassador](#) || [Costa Pro](#) || [Hog Island](#)

**From:** [Germain Cloutier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass comments  
**Date:** Thursday, March 12, 2020 9:08:16 PM

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Dear Mr. McKiernan,

Due to the facts of many meeting closures and the lack of people attending meetings due to the fear of spreading/contracting Coronavirus I hope that many of the emails/letter/calls will be able to give a good idea of the public's input and interest moving forward with regulations.

For striped bass I hope that the coastwide slot suggested by the ASMFC of 28-35" is adopted. And I hope that the Commercial season is NOT opened early and keeps to the usual June 23rd start date. It is better to keep the season the same to ensure the data can be tracked and not have some years where harvesting was 9 months out of the year while others was over a short period of time. Also, with the state of the striped bass it would benefit all parties to ensure that some of these bigger fish that the commercial sector will be chasing make it through the gauntlet before the commercial season starts. What's good for the fish is going to be good for everyone. The proposal to increase the commercial regs by 1" to avoid having to police recreational anglers vs commercial anglers is a good idea to avoid those conflicts. Also moving the harvesting days would also be a supported movement by many I feel. And just to touch on Bluefish for a second It would be great to see their numbers comeback as well so a reduction in creek limit for bluefish would be well received. Thank you for your time.

Thank you,  
Germain

[Sent from Yahoo Mail for iPhone](#)

**From:** [Tom Fuda](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Comments  
**Date:** Thursday, March 12, 2020 7:58:27 PM

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Dear Director McKiernan,

I am writing to you today to express my concern over the proposed change to the start of the commercial striped bass fishing season from June 23 to June 1. I am a CT resident, and an avid recreational fisherman that fishes primarily for striped bass. I also take the occasional trip to MA to fish there as well. In fact I have a trip to Martha's Vineyard planned for June, primarily to enjoy the fine fishing there.

I have been following fishery issues very closely since hearing the most recent Atlantic States Marine Fishery Commission striped bass assessment, in which the fishery was declared over fished, and over fishing is occurring. I applaud your state's efforts in trying to reduce both recreational and commercial harvest by 18%. I also applaud your recent efforts to get your neighboring state of Rhode Island to adopt the same slot limit for recreational fisherman as the rest of the New England states and New York. However, I am concerned about the proposal that is under consideration to open the commercial striped bass fishery as early as June 1. I see that last year, commercial landings of striped bass in MA waters fell approximately 33% below the 870,000 lb quota. With the 18% cut, the quota for 2020 will be approximately 714,000 lbs. Given that the commercial harvest in 2019 fell well below even this reduced quota, it is clear the fishery is in trouble, and that commercial fishermen are having a hard time finding fish. Extending the fishery will only further pressure an already over fished stock. Much as MA recently did with their neighbor in Rhode Island, as a neighbor from CT, I urge you to adopt a "status quo" approach to the commercial season, and stick with the June 23 opening date to protect and rebuild this vital fishery. Thank you for your time.

Sincerely,  
Thomas Fuda



**From:** [DENNIS](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass Regis  
**Date:** Thursday, March 12, 2020 9:51:59 PM

---

Please stop the killing of breeding females over 36" they are our only hope for recovery!  
Sent from my iPad.                      Thanks Dennis

**From:** [Berwyn Wetter](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regs  
**Date:** Friday, March 13, 2020 9:40:33 AM

---

I am a Maine resident who has been fly fishing striped bass for 15 years. During that time I have not caught a stripper over 32 inches. Noting that the MA commercial fishing quota has not been met for 2 years would seem to suggest that legal size fish are in short supply. I would suggest that adding more opportunity to take more fish from the breeder population risks further depletion of the resource. If the commercial quota is not met this year, will there then be a year by year request to add even more days to the commercial season? In short, I am not in favor of any regulatory change that risks depleting what appears to be an already precarious stripper population. I also think stripper fishing should be limited to sport fishing only. Thank you for your attention. Berwyn Wetter, S. Paris, ME

**From:** [Luis Tirado](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 6:57:32 AM

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I wanted to add to my previous email, I believe that anyone, recreational or commercial that is fishing for Striped Bass using any form of bait live or dead should have to use in-line circle hooks. J hooks do not discriminate and hook every size fish.

Also, using gaffs on Striped Bass should be banned. Once a gaff is placed into a fish there is no going back. That fish is either dead, or wounded to the point where survivability is at a minimum.

Thank you for your time.

Captain Luis Tirado  
Diamond Pass Outfitters  
207-899-5985

**From:** [Lisa Eggie](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 7:01:03 AM

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Dear Director Daniel McKiernan

My thoughts on the proposed regulation changes:

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [*J hooks kill no matter who is using them*]
2. The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season before July 1 is wrong. [*opening it earlier exposes large migratory breeder females to increased harvesting*]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [*hurts the legit. Commercial fisherman by encouraging part-timers*]
5. The proposed slot limit is acceptable [*the 18% harvest reduction is necessary*]

And although it is not being considered in the proposed 2020 regulations it ought to be required that all commercial striped bass landings be tagged at point of capture and not point of sale as it is now. Current regs are a tacit endorsement of the rampant illegal black market in stripers.

Additionally, requiring that the entire commercial quota consist of large breeder females is counter productive to the attempted recovery of the species.

Sincerely,

Duane Eggie

**From:** [Josh falk](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 10:57:02 AM

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Greetings, Acting Director Daniel McKiernam.

I am writing to voice my opinion on the matters of preserving the Striped Bass fishery.

I think a slot limit would help slow the declining rate of this species. This should apply to both commercial and recreational fisher-men and women.

There is no need to use a gaff to land a fish. In the event that the fish is too small to harvest or too large(should a slot limit be imposed), gaffing a fish will drastically reduce the likelihood of that fish's survival.

I myself use Circle hooks religiously and have found that the mortality rate has been reduced significantly for all fish species.

The commercial season shouldn't be opened sooner than July 1st. The fish need to migrate to their breeding grounds and need to complete that cycle to preserve the population of the species.

We need not change the days in which the commercial fisherman can harvest the Striped Bass.

Thank you kindly for listening to my concerns.

Best regards

--

Josh Falk  
[www.joshfalk.com](http://www.joshfalk.com)  
[www.studiofreshboston.com](http://www.studiofreshboston.com)

**From:** [NORMAN HYETT](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Thursday, March 12, 2020 4:47:34 PM

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It is essential that striped bass over 35" be protected from both recreational and commercial fishermen. Circle hooks should be used by both groups to insure a better release, and "snag and drop" techniques should be banned when fishing with Menhaden.

Captain Norman Hyett  
238 Winthrop Shore Drive  
Winthrop, MA 02152  
6179090912

Sent from my iPhone

**From:** [Dean Clark](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** striped bass regulatory proposals 2020  
**Date:** Thursday, March 12, 2020 8:44:53 AM

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To: Acting Director McKiernan, Massachusetts Division of Marine Fisheries

From: Stripers Forever

Stripers Forever supports the MA Division of Marine Fisheries and Acting Director McKiernan's proposal implement the ASMFC mandated 18% reduction by following the recommended recreational slot limit of 28-35 inches. We also applaud the MADMF for avoiding the temptation to circumvent the 18% ASMFC mandated mortality reduction by filing for Conservation Equivalencies (CEs) as so many states have.

We are also appreciative of Acting Director McKiernan's letter to Rhode Island encouraging them to fall in line with the other states that are accepting the ASMFC proposed steps to accomplish the mandated 18% harvest reduction in striped bass and do so without Conservation Equivalencies.

Stripers Forever does not support raising the commercial minimum limit to 36 inches because we think that targeting only mature breeder female striped bass for commercial harvesting is counter productive to the efforts being made in the recovery of this fishery. We are also concerned that many recreational fishermen will purchase commercial permits in order to legally harvest fish larger than the recreational slot limit allows thereby putting even more harvesting pressure on female breeder bass. We hope this can be addressed.

Another issue of concern is MA not following the ASMFC's Law Enforcement Committee's recommendation that all commercially harvested fish be tagged at point of capture not point of sale as is the regulation in MA. This loop-hole allows for the existence of a black market in striped bass that is harmful to both the legitimate commercial fishermen and the species itself because the illegal harvest goes unreported and can't be factored into the responsible management of these already over-fished species. We strongly suggest that this be addressed and changed to be consistent with with the recommendations of the ASMFC.

With specific regard to other proposed regulations for 2020 regarding striped bass:

We feel that both recreational AND commercial anglers ought to be subject to the same rules regarding the use of circle hooks.

We feel that what is commonly referred to as the "no gaff" rule ought to apply to commercial anglers as well as to recreational anglers.

We disagree with moving the start of the commercial season to as early as June 1 as doing so will expose even more and larger breeder female bass to harvesting before they can migrate north out of our waters.

We believe that changing the Monday and Thursday open days for commercial harvest to Monday and Wednesday will increase the number of quasi-commercial "part-timers" (recomercials) and thus take away harvest from full-time, commercial fishermen that most need the income from the sale of wild stripers.

Thank you and the MMFAC for taking the above into consideration.

Brad Burns - President Stripers Forever

Dean Clark and Fred Jennings - Co-Chairs, MA Stripers Forever

**From:** [Steve Murphy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Friday, March 13, 2020 9:12:59 AM

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Mr. McKiernan

Thank you for what you and your team do. I realize you are in the unenviable spot between the commercial and recreational interests of the striped bass fishery.

As a bit of background, I am a recreational fly fisherman with a 22 center console in the Merrimack river. I have fished more than 100 mornings a season for the last 20 years. I am fortunate I can get out and fish for a few hours before my work day. I bend down the barb on my flies and release all the fish, with the rare exception of a legal fish that is hooked deeply and will likely die or if a guest wants to keep one for the table. In the last 20 years, I have kept about a dozen fish. I absolutely realize there is mortality associated with catch and release and do my best for all the fish landed on my boat to survive.

As you know, I have seen the very best of the recovery of a near decimated striper population to an amazing comeback. Unfortunately, I believe it is going to crash again. We simply are killing too many breeders and the harvest is still too liberal.

My thoughts of the proposed regulations:

1. The 18% harvest reduction is necessary and proposed slot limit is acceptable
2. Why does the "no gaff" rule not apply to commercial anglers as well as recreational anglers? I use a Boga Grip and keep fish in the water. Please consider changing this rule.
3. Recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks with bait.
4. Please reconsider opening the commercial striped bass season before July 1. This exposes large migratory breeder females to increased harvest.
5. Changing the open days for commercial harvest to Monday and Wednesday is wrong. This hurts the legitimate Commercial fisherman by encouraging part-timers. I understand the commercial fishing interest, but support this group, not the part-timers.

Thank you for your consideration and time. Also, please consider increasing the license fees to help support law enforcement.

Please fee free to contact me if you have any questions.

Best regards.

**Stephen V. Murphy**  
**Chief Executive Officer**  
Northshore International Insurance Services, Inc.  
199 Rosewood Drive  
Suite 310  
Danvers, MA 01923-4539

Office: 978.745.6655 ext. 9037  
Direct: 978.705.4437  
Mobile: 978.314.8213  
Fax: 978.741.1642

Email: [smurphy@niis.com](mailto:smurphy@niis.com)  
[www.niis.com](http://www.niis.com)

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**From:** [Hoyerman, Bill](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass  
**Date:** Thursday, March 12, 2020 4:39:13 PM

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Hello Dan McKiernan and others who may be concerned, I have been an enthusiastic striped bass fishermen all my life. We have seen the ups and downs in the population and are undoubtedly in a downward spiral. Please do what you can to limit this. A bass is worth far more alive than on ice. I believe the commercial fishery in Mass and various regulations up and down the eastern seaboard has been the cause of the decline in this fishery. I know a slot limit would help and one that targets fish under 28-inches; why do we continue to kill the breeders in this state?

Please don't change the commercial fishery to June 1, I think July 15<sup>th</sup> makes far more sense. I know numerous commercial bass fishermen and all of them do it to write off their equipment, boats, etc. – all of them that I know have other primary incomes and do not depend on it as an income. Guides need income too and without the stripers they will suffer and the guide I know this is their principal income. Walk the canal sometime in June and see the slaughter. I enjoy eating striped bass, too but want my grandchildren to enjoy them also, and the small ones are fine to eat!

Please don't let our generation do to these sport fish what happened to so many migratory species. Look at how Florida has benefitted with proper gamefish management.

I would love to discuss this if you have the time.  
Thank you,  
Bill

**William R. Hoyerman, LSP**  
Civil & Environmental Consultants, Inc.  
31 Bellows Road · Raynham, MA 02767  
Direct: 774-409-2711 · Fax: (774) 501-2669  
Mobile: (781) 799-9506 · <http://www.cecinc.com>  
[bhoyerman@cecinc.com](mailto:bhoyerman@cecinc.com)  
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**From:** [trout21](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper Bass Regs  
**Date:** Thursday, March 12, 2020 5:50:05 PM

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We need to reduce the mortality rate of striped bass. We need to require everyone fishing from stiped bass in Massachusetts using bait use circle hooks. We especially need to ban the use of gaffs on striped bass. A gaffed striped bass is a dead striped bass. I have seen boat fishermen gaff short bass in the body and throw them back. Outrageous.

Traditionally, when there was a healthy population of striped bass, the quota was filled within the traditional commercial period. I strongly oppose extending the season. The fact that commercial fishermen cannot fill the quota within the traditional period should be seen as a measurement of the trouble bass are in. Extending the season will only further harm the stock. I also oppose changing the days of the week for commercial fishing.

We also need to establish a tagging system for the harvesting of striped bass. The lack of an effective tagging system invites abuse.

Thank you

John Kaufmann

Sent from [Mail](#) for Windows 10

**From:** [Robert Cameron](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper fishing  
**Date:** Thursday, March 12, 2020 6:19:38 PM

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I feel closing commercial striper fishing until after a reasonable time is allowed to allow female stripers to give birth unobstructed is reasonable and prudent to protect the future of the species. I remember when the stripers were depleted and a new program designed to save future striper fishing was instituted . Please don't make the same mistakes made in the past. Delay commercial striper fishing now and the stripers will do the rest.

Thank you,

Robert Cameron, life long  
Striper fisherman.

Sent from my iPad

**From:** [Bernie&Bev Rubalcaba](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper regulations  
**Date:** Thursday, March 12, 2020 4:36:51 PM

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Please protect our Striper resource. I am a fly fisherman catch and release with barbless hooks

Sent from Bernie Rubalcaba's iPhone

**From:** [Isaac Thomas](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Stripers  
**Date:** Thursday, March 12, 2020 5:38:10 PM

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Due diligence to save our fish ASAP!!

TEACH ENVIRONMENTAL POLICE TO DO A BETTER JOB OF PATROLLING AND  
EXPLAINING TO NON-ENGLISH SPEAKING IMMIGRANTS TO ABIDE BY THE  
LAWS.  
ENFORCING THE LAW TO THE T!

**From:** [Daniel Wells](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Weighing in on MA Proposed Regulations  
**Date:** Friday, March 13, 2020 8:38:37 AM

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Dear Department of Marine Fisheries,

I wanted to let you know that I am in favor of requiring all live bait to only utilize circle hooks. In fact I went on a charter boat and the captain insisted on rigging our live mackerel with two treble hooks even after I asked to use a single circle hook. He said "anglers" never land bass on circles which tells me he is just lazy and killing lots of undersized fish leaving treble hooks in them. So please implement the circle hook mandate and enforce it ruthlessly. We need to cull captains like that one.

Gaffing striped bass is not needed they can get a big net if the captain is really concerned about landing a fish. Please create and enforce the "no gaff" rule.

The commercial season should not begin before 1 July so please do not allow an early opening. Also commercial days should remain the way the regulation currently exists.

The slot limit is better than current regulations so please implement it. Personally I would like to see a higher and narrower slot limit of 32" to 35" to ensure younger females get more breeding opportunities before they become available to harvest, however I understand that is not on the table so the proposed slot will work for now.

I know these are not on the table, but other items of concern:

1. Regulating the Cape Cod Canal better is a priority. I have encountered so much poor angler behavior there that is severely damaging the breeding population it needs to be curbed ASAP.
2. There are too many independently wealthy rec fishermen I know that also have commercial permits. They keep limits of bass just to pay for gas money when they don't need the money at all. I would love to see a reduction in commercial permits issued and some sort of financial test applied where at least 50% of the individual's income is fishing or waterman based. I grew up on the bay with commercial fishermen. I don't want to see commercial fishing die, but I also don't like seeing people taking a commercial limit of bass "for fun" which is the case in have the "commercial" fishermen I know.

Sincerely,  
Daniel Wells  
Hingham, MA

Cape Cod Salties Sportfishing Club  
Box 1183  
S. Dennis, MA 02660

Acting Director Daniel McKiernan

Division of Marine Fisheries

Sir:

The Cape Cod Salties Sportfishing Club at a regular monthly meeting discussed at length the current proposals for the regulation of Striped Bass Fishing and have voted the following positions:

We support the recreational slot limit of 1 fish per day 28 to 35"  
We support mandatory circle hook use for all bait fishing  
We support the no gaff regulation for all striped bass fishing

We do not support the proposal to open the commercial season before July 1.

We do not support the proposal to change the commercial designated fishing days from Mon and Thurs to Mon and Wed. (over the past few years we have all adapted to the existing schedule for our recreational access to the many boat ramps in our area for either fishing or family boating. We avoid the commercial fishing days because the boat ramp parking lots are full, and we have modified lives accordingly regarding issues of work, child care, grandchildren care and wish this to remain consistent).

The commercial regulations should be the same as the recreational regulations regarding circle hooks for all bait fishing and no gaffs allowed.

C. Randall Sherman

VP Cape Cod Salties Sportfishing Club

508 280 8825

F/V The Boys  
21 Squirrel Hill Lane, Hingham

F/V Charles Seabrook  
21 Wollaston Street, Wollaston

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**To:** Acting Director, Daniel McKiernan  
**From:** Erik Waal and Mark Plachowicz  
**Date:** March 16, 2020  
**Subject:** Public Comment, 322 CMR §6.22, §6.28 & §6.34

Mr. McKiernan,

Thank you for the opportunity to comment on 323 CMR §6.22 (A &B), §6.28 (B) & §6.34 (C). Each of the proposed amendments detailed above, will have an overwhelmingly positive benefit to our businesses.

**322 CMR §6.22 (A) - Increasing Summer Flounder Trip Limits to 400 pounds.**

This is a significant amendment and will positively impact all vessels and individuals engaged in the fishery. The approach of increasing by 100 lbs for mobile gear and 50 lbs for rod and reel fishermen, ensures equitable access to both gear types. The increase is timely and will enable the fleet to capitalize on the higher, early season prices, land more fish and not impact what has been a historically stable supply and demand fishery.

The fleet had difficulty landing the allocated quota for the 2019 fishing year and left more than 25% on the table. With the additional ~260,000 lbs allocated to the 2020 year fishing year, we agree and feel this is a cautious and appropriate approach while ensuring increased landings are utilized.

Is there an option to request one consideration? Where the main goal of the advisory commission is to maximize 100% of the allocated quota, is there a way to unilaterally approve/pre-approve an increase to 500 lbs per day for mobile gear, if 50% of the quota is not caught by a certain date?

**322 CMR §6.22 (B) - Trawlers to retain and land two consecutive daily limits of summer flounder.**

This was a great benefit to both of our businesses. By allowing the two consecutive days of landings it allowed us to fish a wider area, the boats didn't need to rush to meet trucks and allowed both boats to adjust to weather days to get back to the dock.

This should also be heralded as a prime example of the industry and fisheries managers working together to achieve mutually beneficial changes and aligning to a common goal.



F/V The Boys  
21 Squirrel Hill Lane, Hingham

F/V Charles Seabrook  
21 Wollaston Street, Wollaston

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**322 CMR §6.28 (C) - Commercial Black Sea Bass**

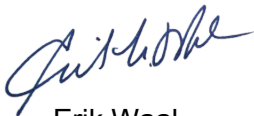
We offer our full support for the 100 lbs incidental catch limits during the small mesh squid fishery. While we rarely see that kind of volume when engaged in squid fishing, in the event that we do happen to land more than 50 lbs Black Sea Bass, it will be helpful.

Similarly, we offer our full support for the considerations detailed for the large mesh fishery as well. During the summer flounder fishery we rarely see any sizable volumes of Black Sea Bass, but it is encouraging and could be an important part of our economic model to be able to retain those landed fish, should the opportunity present itself.

**322 CMR §6.34 - Commercial Horseshoe Crab Trawl Limits**

The proposed 75 crabs per day, open access permit for managing incidental catch is an appropriate consideration and addresses the frustrations of current limited access permit holders. Further it restores the viability of the limited access permits and their intrinsic value to the current permit holders.

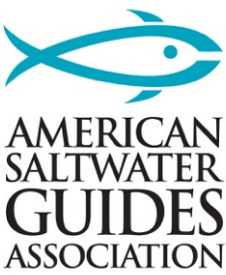
Thank you,



Erik Waal



Mark Plachowicz



Promoting Sustainable  
Business Through  
Marine Conservation

Dear Mr. McKiernan,

The American Saltwater Guides Association appreciates the opportunity to comment on proposed regulation changes for Massachusetts for the 2020 season. Massachusetts has a long history of taking the lead in marine conservation issues.

We would like to go on record thanking you for your recent letter to Rhode Island requesting that they adopt the same size limits for striped bass as neighboring jurisdictions. We strongly believe that standard coastwide regulations are key to striped bass recovery. Your efforts did not go unnoticed.

**1) Recreational Striped Bass (322 CMR 6.07)**

- a. We support the proposed changes
- b. We strongly support the use of circle hooks
- c. We strongly support the use of non-lethal devices for lifting striped bass from the water.

**2) Recreational Bluefish (322 CMR 6.18)**

We support the lower creel limit for recreational bluefish harvest in 2020. Again, standardized coastwide measures will ensure the recovery of the bluefish stock in a little time as possible. This also fulfills our commitment to the Magnuson Stevens Act in relation to the overfished status of bluefish.

**3) Commercial Striped Bass (322 CMR 6.07)**

We support the 18% reduction in quota for striped bass in the commercial sector.

- a. We do not support expanding the commercial season with an earlier start date. Now is not the time to extend seasons for any sector. We must all work together to recover striped bass. If seasons must be extended to hit the quota, then we know the stock is in trouble.
- b. We support the adjustment in days allowed to fish
- c. We support the 1" increase in size limit to avoid potential conflicts with overlap between the recreational and commercial fisheries

The American Saltwater Guides Association is not opposed to commercial fishing for striped bass. We feel that the current status of striped bass presents a unique opportunity to revamp the commercial system in Massachusetts. Our concern is that some recreational anglers will obtain commercial permits only to be able to kill larger fish. This situation could take opportunity away from the commercial striped bass fisherman who depend on the season for income.

Peter Jenkins,  
Chairman

Board:

ME, Capt. Kyle Schaefer,  
Soul Fly Outfitters

NH, Capt. Peter,  
Whalen, Shoals Fly  
Fishing and Light Tackle

MA, Capt. Jamie, Boyle  
Boylermaker Charters

RI, Capt. Dave Monti, No  
Fluke Fishing

CT, Capt. Ian Devlin,  
Devlin Fishing

NY, Capt. Paul Dixon, To  
The Point Charters

NJ, Capt. Geno Quigley,  
Shore Catch Charters

DE, Tyler O'Neill,  
Norvise

VA, Capt. Chris  
Newsome, Bay Fly  
Fishing

NC, Capt. Tom Roller,  
Waterdog Guide Service

Washington, DC, Rich  
Farino, District Angling

Capt John McMurray,  
President

Tony Friedrich,  
VP/Policy Director



**AMERICAN  
SALTWATER  
GUIDES  
ASSOCIATION**

Promoting Sustainable  
Business Through  
Marine Conservation

Peter Jenkins,  
Chairman

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Soul Fly Outfitters

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Shore Catch Charters

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Norvise

VA, Capt. Chris  
Newsome, Bay Fly  
Fishing

NC, Capt. Tom Roller,  
Waterdog Guide Service

Washington, DC, Rich  
Farino, District Angling

Capt John McMurray,  
President

Tony Friedrich,  
VP/Policy Director

We would appreciate an opportunity to work with the state to develop a new framework that ensures the future of small scale commercial striped bass fishermen that truly depend on the fishery. With the quota dropping by 18% and the new regulations for recreational fishermen, there is a chance that the true commercial fisherman will be negatively impacted by increased activity from anglers who are not dependent on this season.

We thank you for your time and consideration on these important issues as they directly impact our ability to contribute to the economy of Massachusetts. We look forward to further conversations on how to enhance the commercial fishery for those who are truly dependent on it.

Respectfully,

*Tony Friedrich*

*Jamie Boyle*

**Tony Friedrich VP/Policy Director**

**Jamie Boyle Massachusetts Board Member**

**From:** [Mohawk Bolin](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attention Dan McKiernan  
**Date:** Tuesday, March 17, 2020 1:53:55 PM

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

Hi Dan,

Hope you and the staff up there are doing well and staying safe up there.

I'm writing in regards to the coming Black seabass season. I have spoken with many commercial fisherman from Cape Cod , the Vineyard and the south coast. Also a couple of dealers and restaurant owners. All the fisherman I spoke with, mostly pot guys, want to see us get rid of Sunday's. The general consensus has been not going up on weekly catch and going 2 days a week.

In theory this would extend the season and give the dealers and restaurants a steady reliable market. Which hopefully would translate into more demand and higher prices.

Other advantages would less overhead and also less gear in the water. We all know the importance of having less end lines in the water.

Please consider these changes and make a good thing a good thing.

Strange times we are living in right now. Good luck and stay safe!

Regards, Mohawk Bolin  
F/V Rock&Roll  
Sent from my iPhone

**From:** [John Hoy](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Black sea bass comm. regs.  
**Date:** Monday, March 16, 2020 9:40:24 PM

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Dear DMF, I favor the two day (Tuesday, Thursday) fishing week. Most guys I know on the Vineyard do as well. I think the price will be better.

If there's a little quota left at the end, we can try something else next year. No big deal.

Thanks, John Hoy

**From:** [Gerald Audet](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comments on 2020 Striped Bass Season in Mass  
**Date:** Monday, March 16, 2020 4:26:45 PM

---

ATTN: Acting Director Daniel McKiernan

I am writing with comments on the Striped Bass regulations for the 2020 season in Massachusetts

I want to voice my VERY strong concern about the health of the fishery. We are in serious trouble. The fishery is at risk of great peril.

Therefore, I support:

Both recreational and commercial anglers should be subjected to the same rules regarding the use of circle hooks. NO J HOOKS!

The “no gaff” rule ought to apply to commercial anglers as well as recreational anglers.

Opening the commercial striped bass season before July 1 is wrong. The last thing we need is MORE opportunities to kill kill. This goes directly counter to new conservation measures.

Changing the open days for commercial harvest to Monday and Wednesday is wrong- this also makes no sense!

The proposed slot limit is acceptable, although I adamantly believe it will not be enough. However, coast wide consistency is important at this point. We MUST reach at LEAST a 18% coast wide reduction. It seems to me the timeline is unreasonably long, and we should be shooting for 25%, but if this is my only option than that is what I will accept.

Thank you

Dr. Gerald Audet  
Douglas, MA

**From:** [Frederic B. Jennings, Jr., Ph.D.](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Fred Jennings Comments on MA DMF Proposed Striped Bass Regulations  
**Date:** Saturday, March 14, 2020 7:46:19 PM  
**Attachments:** [CEEEE Letter to Acting Director of MA DMF McKiernan on MA WSB Regulatory Proposals on 14 March 2020.pdf](#)

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## ***Center for Ecological Economic and Ethical Education***

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email:

Acting Director Daniel McKiernan

Division of Marine Fisheries

251 Causeway Street, Suite 400  
**Regulations**

**RE: Proposed Striped Bass**

Boston, Massachusetts 02114

By email to: [marine.fish@mass.gov](mailto:marine.fish@mass.gov)

Dear Acting Director McKiernan:

I am writing to you today in regard to your request for comments and thoughts on the proposed reduction on striped bass harvest of 18%, and on how this reduction might be implemented in the most effective manner.

I have fished for wild striped bass (WSB) for 65 years, mostly in the area of Ipswich. From about 1993 until around 2003, we had the best fishing I have ever had (anywhere in the world for any species) in this particular fishery; we had the makings of a world-class blue-ribbon fishery that was attracting people to Massachusetts from all over the world. The potential for an even better striped bass fishery was very real

and within reach at that time. But instead, this potential was lost, frittered away by short-sighted regulations that failed to keep perspective on what really should have been a primary purpose: to develop, maintain and sustain a healthy and abundant resource for everyone to use and enjoy.

Protecting the *large female breeders* should be our first priority, as their health and numbers represent the future of this fishery, for better or for worse. Selectively culling the brood stock is a disastrous strategy. That is some of the basis for the recommendations that follow. Another concern is one of *equitable treatment* for all participants in this fishery. But the most important need in this situation is to *reduce the mortality* of these fish.

Here is what I would propose:

1. ***On the use of circle hooks***: I am glad that MA DMF has finally begun to advocate the use of circle hooks in this fishery, where the vast majority of fish caught are released. However, I would suggest that circle hooks be required (or, at least, strongly recommended) in both recreational and commercial striped bass fisheries. I am a fly fisherman, and I have used long-shanked hooks for years that I bend in such a way that the point of the hook is aimed *behind the eye of the hook* (because circle hooks have been so hard to find). I have found that this method works well to reduce deep-hooked fish.
2. ***Single barbless hooks***: I also have been bending down the barbs on all of my hooks for the last 40 years or so, once I learned this technique. It is much more sporting and does far less damage to the fish when the hook is removed before releasing that fish. I think your division should strongly advise (if not require) a use of single barbless hooks on all lures and flies in the striped bass fishery.
3. ***On the use of gaffs***: There should be no use of gaffs in the striped bass fishery, by either recreational or commercial fishermen. There is no necessity of doing so. Any claims that gaffs are necessary to handle fish from a boat are specious and absurd; that is the whole purpose of tools such as the Boga-Grip. It is impossible to judge whether an active fish is “keeper-sized” until it is fully brought in; using gaffs on such fish simply involves an unnecessary increase in their mortality when not kept.
4. ***On the proposed slot limit***: I am really glad to see the MA DMF considering a slot limit in this fishery, even of 28” to 35” (although I personally would prefer a 20” to 26” slot such as was adopted in Maine for several years). There are two benefits of a slot limit: (a) it reduces the pressure on the largest fish (which are all female breeders); and (b) it selects in favor of the most rapidly-growing fish (which are in the slot and thus vulnerable for the shortest amount of time). As a management tool, a slot limit is very flexible, as it allows one to narrow it or shift its size limits to comport with the age/size profile of the stock and thus to protect the most important cohorts for reproduction purposes. However, there is one problem with this proposed regulation: you are only imposing it on the recreational fishery when it should also be applied to the commercial fishery. Otherwise, there are two real problems with this proposal. First and foremost, it may drive a lot of recreational anglers to purchase



commercial striped bass permits simply to get around the slot limit and take larger fish (which will *increase the mortality* of large female breeders, which is what we all want to prevent). Second, not only are the largest striped bass all females and part of the brood stock, they are loaded with *PCBs and methyl mercury* in far higher concentrations than the smaller fish in the slot limit, so we shouldn't really be eating these larger fish anyway. Let's save them for reproduction, both better to conserve this fishery and to protect public health from these toxins. So I would urge you to apply this slot limit to both the recreational and the commercial WSB fisheries.

5. **On any earlier opening of the commercial striped bass season:** I am opposed to any earlier opening of this season, most especially if you are not going to hold commercial permit holders to the same slot limit as recreational anglers. Such a change will simply expose the large migratory breeder females to even higher mortality than they are currently experiencing. If the purpose of these new regulations is to reduce the mortality of these fish – and especially of their spawning stock biomass – any earlier opening of the commercial season is a very bad idea. It may defeat the whole purpose of the ASMFC 18% reduction.

6. **On shifting the open commercial days from Monday and Thursday to Monday and Wednesday:** This change does not make commercial sense to me. Having these open days on Monday and Thursday allows markets to clear a bit better, and therefore protects the price of these fish from falling due to a glut of fish on the market in a shorter period of time. Furthermore, this shift increases an opportunity for abuse since some fish caught on Tuesday in a three-day spree could be sold as 'fresh' on Wednesday. The economics suggests that leaving the legal commercial days on Monday and Thursday makes a lot more sense.

7. **On the equal 18% reduction targeted for recreational and commercial mortality:** I was glad to hear that this equal reduction was endorsed by the ASMFC, and I hope MA DMF adheres to this idea. It would be grossly unfair to reduce the recreational mortality by a greater amount than the commercial mortality.

8. **On the use of an 18% targeted reduction in mortality:** I am very concerned that this reduction has only a 50 percent chance of success, which also means that it has a 50 percent chance of failure! Given the long and sorry history of mismanagement of this fishery, my own personal view is that a **full moratorium** on any harvesting of striped bass should be imposed, to assure their long-term viability. That would involve hard political decisions on your part: to end the commercial harvest (at least temporarily) altogether and to make the entire recreational striped bass fishery also catch-and-release. That would be my own view – as a personal preference – but I am not under any illusions that MA DMF would consider such an option.

So those are my thoughts on the matter. In sum, I would ask you to require **circle hooks** for both commercial and recreational fishing on all lures and flies, and furthermore to require **single-barbless hooks** in both of these fisheries as well,

which should reduce their mortality upon release. **Gaffs** should be outlawed for every use in this striped bass fishery, for similar reasons. Adopting a **slot limit** is a good idea, but I think it should be applied to smaller fish (and perhaps be narrower), and this slot limit should also be imposed on the commercial fishery.

I wouldn't change the **commercial fishing days** from Monday and Thursday to Monday and Wednesday, and I wouldn't open the **commercial season** a month earlier (on June first) instead of on July first. The **18 percent reduction** should apply equally to both the recreational and commercial fisheries, although that restriction only offers a 50 percent chance of success (and thus a 50 percent chance of failure); consequently, my own *personal* preference would be to favor a complete **moratorium** on harvesting *any* wild striped bass (at least temporarily), just to allow this species to recover, due to its much-depleted condition. We could revive a world-class fishery in Massachusetts if we had the courage to protect it in this manner with a complete (temporary) moratorium.

Thank you for your role in helping to conserve and protect this important species. I hope that my sharing of thoughts on this fishery are found helpful and useful in your efforts to guide policy for the best interests of this fishery and the public at large.

Most sincerely,

Frederic B. Jennings Jr., Ph.D.

CEEEE President and Founder

**From:** [Paul Unangst](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** proposed adjustment to summer flounder and horseshoe crab limit  
**Date:** Monday, March 16, 2020 1:27:49 PM

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ATT Dan McKiernan

3/16/20

My name is Paul Unangst from Marshfield Mass fishing on my boat Destiny for summer flounder in Nantucket Sound for over 30 years.

i am writing to give my opinion of the proposal DMF has out for the upcoming 2020 summer flounder and horseshoe crab limit.

I would like the trip limit for fluke to stay at 300 lbs . Last year was a lot different from years past for many reasons there was a lot of weed around nantucket sound that

would plug our nets each tow which really reduces your catch on fluke by closing the net up and reducing your towing speed. If the quota were to increase the areas in the sound will never get any rest from boats never mind if boats were allowed 2 days limit.

I would also recommend not to allow the pilot program to land 2 consecutive days limit in one day. My letter would be to long to explain the problems with allowing 2 limits on vessels even thou there would be days that it would be easier for me to go into Nantucket and fish another day to get 2 limits there are way to many negatives that would make this program not work.

I would also like to recommend the horseshoe crab limit for cap permit holders that do not hold a limited entry permit to be at 200 crabs instead of the 75 crabs suggested.

Last year was the first year the crab quota was caught there were crabs every area we fished last year in the sound even places that had very few in years past.

Thank you

Paul Unangst

**From:** [william.martin](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed Regulations to Protect the Striped Bass  
**Date:** Monday, March 16, 2020 3:23:42 PM

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Though I live in Maryland, I have fished for stripers twice yearly for over twenty years. The June and Sept fishing has been exceptional and warranted our coming to both MA and RI. My trips are at risk now. I cant justify ,my own harvest.

We (esp the recreational anglers) are trying to do our part in MD to protect the local and important brood stock of stripers. Our biggest problem has been a lack of reporting recreational mortality plus a terrible problem with commercial fishermen illegally harvesting huge mounts of mature fish. (Their astoundingly large harvest is not even estimated by ASMFC.!) Our Governor has listened far too closely to his commercial fishing constituents and even fired the two most talented fisheries managers we had.

The striped bass breeding population is clearly in trouble once again.

I have recommended to our Maryland managers that we in MD reduce our catch by more than 18% taking reductions equally from commercial and recreational constituents. Recognizing their greater impact on the states' economies, I also recommend that we make striped bass a recreational fish only. Supporting 40 or so commercial fishermen ,simply doesn't make economic sense.

I would also like to comment on the impending MA regulations. I favor the following:

Have a shorter season for both commercial AND recreational fishermen.

Protect all large breeding striped bass. This is best done by a thoughtful slot system. It makes me sick to see 45-50 inch roe laden stripers in Wegmans stores Maryland in July Aug. and early Sept. Your state can argue about the slot sizes, but one thought is to allow a slot of between 27" (or 28") and 35". Return all fish over 35. I suggested this to a commercial fisherman in Pt. Judith and he threatened to throw me in the harbor.

Require that all bait fishermen use circle hooks.

Gaffing of stripers should be prohibited. (I had two guides gaff very large breeding stock fish without permission despite my prior instructions that I want to return all large fish for breeding. Since I do not eat large stripers due to mercury poisoning, they kept the fish and probably sold them for profit to unknowledgeable consumers. I hope they did not feed children. I no longer fish with those captains.

William H. Martin, Ph.D.  
20 Aintree Road  
Towson MD 21286  
410-321-7859

**From:** [Barry Woods](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Mass proposed Striped Bass Regulations  
**Date:** Sunday, March 15, 2020 8:41:51 PM

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Dear Acting Director McKiernan

I am a dedicated saltwater recreational fishermen, who fishes from shore and boat in the waters of Cape Cod from May through October. I have done so since I was in junior high in 1973.

I own a property in Falmouth, MA and a boat. I spend thousands of dollars every year in service to my obsession

I am seriously concerned with the current status of large striped bass throughout their normal range.

Last year MA hook and line commercial folks were not able to fill their quota of large bass. The same will be true this year. Extending their season to allow them to fish in June, allowing gaffs, changing days to earlier in the week, are not well conceived, especially opening the season sooner. We are all in the same boat and commercials should not be given more leeway to try to kill fish stock that are not in a healthy condition. They should find more fish due to the slot limit settings, even in their regular season parameters.

As a recreational angler, I would support much more stringent limits on bass for everyone, including myself. If we do not stop the decline, all of us will suffer.. for years to come.

I supported allowing the taking of larger bass (over 35") rather than the slot limit to prevent hammering the exist healthier classes of fish. We should fund policing the Cape Cod Canal and the abuses that recreational anglers visit on a large proportion of breeding female fish in that kill zone. There are many things DMR can do that will help the situation. Make all fish that are sold be tagged when caught- something most other states require to enable law enforcement to identify where and when a fish was caught- and by WHO.

I urge you to keep the existing commercial regs as they are and do more to enforce the current regs for everyone. I hope that we see recovery begin this year if we all sacrifice a bit.

Thank you for your time.

Sincerely,  
Barry Woods

**From:** [LaRee Goulet](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** 2020 Striped Bass regulations  
**Date:** Sunday, March 15, 2020 11:11:09 AM

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Mr. McKiernan,

Please consider the seriously depleted state of the striped bass stocks in any new regulations you are supporting. It is clear to all that have spent a lifetime fishing for striped bass that the fish stocks are in trouble. Please do the right thing and protect what breeding fish are left. Any more pressure on these fish will ultimately result in a total collapse of the stock, assuming that it isn't too late already. Nobody benefits when the fish are all gone.

Thank you for your consideration.

Bob Goulet  
Biddeford Me.

**From:** [Arno Ewing](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attention: Dan McKiernan  
**Date:** Saturday, March 14, 2020 1:26:33 PM

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Hey Dan,

Thank you for coming to Martha's Vineyard Thursday to talk about the regulation changes. My name is Arno Ewing, I was at the meeting. I'm 29 years old and have been working as a commercial fisherman, year-round, for my sole income, for the last 10 years. I thank you and the department for helping to keep the stocks managed.

Because the science is showing 90 percent of fish removals coming out of the recreational sector with discarded fish accounting for the highest mortality, I think it would make sense to impose a catch and release limit for the recreational fishery. Think about it, no more than 10 fish may be caught and released by any rec. angler. If one of those fish falls within the keeper bracket, of course they may keep and eat it. I'm all for recreational fishing, especially if you're trying to get a meal out of it. For many years there have been upwards of 50, some days over 100, recreational boats fishing for schoolie to keeper sized striped bass in the middle ground rips in vineyard sound. People brag about catching 50 or more schoolie bass in one fishing session. I know that this kind of "sport" mentality generates waste of this precious resource. Too many fish are dying just so people can have the thrill of feeling them struggle, not for the nourishment of feeding their families or community. This is obviously happening in many more places than just middle ground. I'm sure that anyone who cares and reads the stock assessment report will limit this kind of activity, and if they are practicing catch and release de-barb their hooks and not use treble hooks. For people who don't read the report and don't know what's going on, if they hopefully see the recreational regulations, they will see that they need to take it easy with these fish.

Years ago when the striper stocks have gotten low, a catch and release limit might not be as important, but in today's world with an exploding human population and many other species being squeezed out, I believe a catch and release limit is something seriously worth considering. It would obviously be somewhat of an honor system, but still worth it. There are microplastics compromising the immune systems of marine life (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6132564/?report=classic>). The waters are warming and becoming more acidic. Every year more and more seabass are becoming riddled with worms. Have you seen this? Worms in seabass? I just noticed it for the first time two years ago.

Thank you very much for reading this and considering a catch and release limit. If one is imposed or at least mentioned, there will be less fish being hooked and handled, therefore less fish being discarded dead or too injured to feed.

Sincerely,  
Christopher Arno Ewing

**From:** [keith.peterson](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Attn: Acting Director D. McKiernan  
**Date:** Friday, March 13, 2020 6:32:07 PM

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I am writing you to Oppose the proposed change to the Legal Selling Days for Stripe Bass. The proposed change is moving the selling days to Monday and Wednesdays. I am against this. Please keep the legal selling days as Mondays and Thursdays. I see no benefit to changing the days. The current rules were changed several years ago to maximize the Value of stripe Bass. The current selling days have worked and the price per pound of Stripe bass has never been higher. The proposed change would only lower the value of the stripe bass on the open market because the fish would not be fresh for the Friday & weekend buyers.

Thank you  
Keith Peterson  
173 Jackson st  
Jefferson, MA 01522

MA Comm Permit # 168437



**From:** [drew kolek](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Comment on proposed regulation changes- Striped Bass  
**Date:** Friday, March 13, 2020 5:08:35 PM

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Dear Acting Director McKiernen:

While I have no position on the requirement to use circle hooks **while fishing** for striped bass with natural baits, I am opposed to the proposal to require the use of circle hooks when having striped bass in **possession**. If a fisherman goes out in the morning and catches one striped bass and then wishes to fish for fluke, scup or sea bass he should not be required to use circle hooks for these other species. Circle hooks may be effective for striped bass but they do not work for fluke, scup and sea bass.

The striped bass swallows the bait and turns 90 degrees. As the bait pulls out of its mouth the bass is hooked in the jaw by the circle hook. Fluke, scup and sea bass attack the bait straight on and do not turn. If you use circle hooks for these species you will just pull the hook straight out of its mouth.

It should be obvious to law enforcement based on the fishing technique and the area being fished whether a person is fishing for striped bass or not.

I request that you drop the requirement to use circle hooks if you are **fishing for** species other than striped bass.

Drew Kolek

**From:** [Mark Mattson](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** comments on Proposed amendments to Division of Marine Fisheries regulations  
**Date:** Monday, March 16, 2020 10:10:03 AM

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Dear DMF,

Thank you for the opportunity to review and comment. In general I support more restrictive limits on commercial fishing and I support most changes to recreational fishing. I have a few specific comments:

- 1) 6.07:4c you missed on 34 inch to 35 inch sentence.
- 2) Why not make circle hooks mandatory immediately instead of 2021?
- 3) Why allow commercial to take the big reproducing females >35 inches??? I would think the best way is to allow the same as recreational fisherman, but put much more strict limits on the lbs allowed for commercial.
- 4) There should be limits on trawlers to use brief trawls and return undersize fish more quickly to reduce mortality.
- 5) on recreational bluefish, can we let public, especially kids, catch 5, smaller snapper blues as long as all are less than , say 24 inches? Sometimes that is the only option for a dinner and those fish are not reproducing.

thank you, and good luck.

Mark Mattson

**From:** [Phil](#)  
**To:** [ray@capecodfishermen.org](mailto:ray@capecodfishermen.org); [cpfcharters@yahoo.com](mailto:cpfcharters@yahoo.com); [charlie@quinnfisheries.com](mailto:charlie@quinnfisheries.com); [timfsh154@aim.com](mailto:timfsh154@aim.com); [sooky55@aol.com](mailto:sooky55@aol.com); [McKiernan, Dan \(FWE\)](#); [Silva, Jared \(FWE\)](#)  
**Subject:** Commercial summer flounder public comment  
**Date:** Sunday, March 15, 2020 6:19:44 PM

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Dear Commission members and DMF staff.

Please consider my concerns with the commercial summer flounder trip and possession limit increases requested. My participation in state waters, mobile gear spans nearly 40 years. Early on I experienced years of intense, under-regulated fishing nearly collapsing the resource followed by increased regulation, then recovery and stability.

Three years ago the commission approved allowing mobile gear CAP holders to upgrade to 50 feet with unlimited horsepower. While I think it was a good decision for the safety of the crew the resource is feeling the impact. The upgrades are not 45 foot vessels increasing to 50ft they are 40 ft vessels increasing to 50 ft, towing much larger gear able to fish twice the weather. These vessel upgrades are happening and will continue to happen for years to come.

Wise management of our Fluke fishery is extremely important at this time with limited options besides fluke. Example

1) Sea scalloping state water ,is the worst I have seen, no one is going, its that poor. Recent landings will show.

2) Haddock fishing Cape Cod bay was April,May its recovery peaked 2018. My average day was 4,000 lbs. It's was overfished by ground fish boats 90 fathom east of Nantucket, the core of the biomass ,with smaller mesh than we're allowed.They've moved on to juvenile monktail deep waters to the west.

3) Blackback flounders Cape Cod Bay. We have been forced out of this sustainable fishery by young aggressive Lobstermen filling in the traditional dragger tows that seasoned Lobstermen have respected.Recent blackback landings will show.

Increasing trawler trip limits of Fluke from 300 pounds to 400 pounds? Yes it makes sense with the elevated quota we are to receive, If that was the only fluke decision to be made I would fully support it.

The second decision on fluke to be made is whether to allow Two consecutive daily limits of fluke aboard a Trawler.

I live only 20 minutes from my boat, I travel home in the afternoon. Two day limit no benefit to most of us. However I am sympathetic to those that sleep on their vessels in Nantucket.They travel great distances, some from out of state weekly. If those boats fish Nantucket sound each day and land the second day, I can support that allowance if it doesn't negatively effect our fishery.

Moving forward I ask for caution and if implemented, and close supervision of the fishery as a whole. My concern is the 50-70 ft vessel that will respond to the much bigger stock,

A typical year dragging for fluke we leave in the morning we make one tow and we're headed in at 9 o'clock in the morning with a 300 pound limit \$1,500 stock with conch bycatch. 400 lbs should produce \$2,000. And 800lbs with bycatch \$4,000.

1) We are potentially creating a fishery that enforcement cant enforce.

Your allowing a vessel to offload 800 lbs of fluke, two 400 lb limits. Did that boat fish yesterday or only fish today. Creating a 800 lb fishery from a 300 lb fishery the gross stock increases over 2-1/2 fold.

2) Will a vessel concentrate on conch in one area all day for his 1000 lbs and the next day move and catch his 800lbs fluke. If so conch resource will be impacted.

3) What other fisheries will also want the two day possession limit, example the Dayboat sea scalloping around Provincetown also a hardship, landing in Plymouth,Sandwich or returning to New Bedford.

Let's find a way to make it work for the few boats that want to overnight in Nantucket without jeopardizing the whole fishery

Thank you,

Phillip Michaud

**From:** [Thomas Howe](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Input on proposed striped bass regulations  
**Date:** Saturday, March 14, 2020 10:41:02 AM

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Hello Acting Director McKiernan. I'm an avid flyfisherman for stripers in MA waters, even though I live in New Hampshire, and offer the following comments on the proposed new regulations for stripers:

Regarding **type of hooks**, circle hooks save fish being returned to the water, and ought to be required for recreational and commercial anglers. This only makes good sense for perpetuation of this great fishery.

I endorse the **proposed slot limit**. Reducing the harvest makes good sense.

The use of **gaffs** should be prohibited for all anglers, commercial and recreational. This practice simply kills fish unnecessarily.

Regarding **commercial season**, don't open this before July 1, as this hurts the breeding population.

Regarding **tagging of commercially taken stripers**, the tags should go on the fish at the time and place of catch, not at the later time/point of sale, to reduce invitation for black market sales.

Finally, I oppose the **commercial take focusing on the larger breeding females**--this is the group we need to protect the most to ensure strong, continued stocks. Besides, the smaller ones taste better and have more tender meat!

Many thanks for your consideration.

Tom Howe  
38 Perkins Rd.  
Gilmanton Iron Works, NH 03837  
([tah.tomhowe@gmail.com](mailto:tah.tomhowe@gmail.com))

**From:** [arnold.savolainen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Mass Strped Bass Management Plan  
**Date:** Sunday, March 15, 2020 11:13:55 AM

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To Acting director Dan McKieman,

As a recreational striped bass fisherman I am in favor of the following changes:

Section 1 Recreational

Option 1a 28" to 35 "max

Section 2 Commercial

Option 2c-3 reduce quota 18% and 28" to 35%

Regards

Arnold Savolainen

**From:** [Russ Falardeau](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Opposition to starting the commercial striped bass season:  
**Date:** Saturday, March 14, 2020 9:45:47 PM

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Dear Sirs and Madams

Please direct to appropriate striped bass commercial season extension personnel.

You got to be kidding me with proposing to open the commercial striped bass season June 1<sup>st</sup>. We are suppose to be reducing the striped bass harvest by 18%. You will do this by increasing the number of days commercial fish can be harvested. Make no sense to me. And you are going to expand the number of allowable commercial harvest days and doing this at peak spring migration times for Massachusetts. What kind of logic is this, I tell you, your logic is money rules, wildlife looses.

I have had it with you guys. Bring back the Russian fishing fleet, they caused less damage to the fisheries that you guys do. I cannot see the justification for starting the commercial season on June 1<sup>st</sup>. Soon we will not need you guys anyways because there will not be enough fish to manage

Thank you for listening

Russ Falardeau

**From:** [George Marble](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Proposed Changes to Striped Bass Regulations  
**Date:** Sunday, March 15, 2020 10:27:35 AM

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To Whom It May Concern:

First of all, I would like to applaud the commission on proposing the new slot limit for the taking of striped bass. We need to save this remarkable resource that we are blessed to have in our coastal environs.

However, please, please consider mandating the circle hook, and "no gaff" rules for all commercial AND recreational anglers. I was horrified when the captain of my charter gaffed a beautiful 48 1/2 inch striper I caught. I wanted it released, but he overrode my request...no more business for that idiot.

Finally, please re-consider the proposal to open the commercial striped bass fishing prior to July 1st. We need to increase the stocks of striped bass before we risk harvesting greater numbers of reproductive stripers.

We need to look at our striped bass situation the way Maine's lobstermen look at preserving the lobster population for future generations...it is good for commercial and recreational anglers, but most of all it is good for the striped bass stocks in our waters.

George C. Marble

**From:** [drew.kolek](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** proposed regulation changes- Commercial fluke and sea bass  
**Date:** Friday, March 13, 2020 5:51:21 PM

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Dear Acting Director McKiernan:

I and many of my friends have been hook fishing for fluke commercially for many years. Historically, we fished in Vineyard Sound from opening day until about the second week in July and then followed the fish south to Nomans Island. In recent years, however, the fluke are sparse in Vineyard Sound and are gone by the second week of June. Fishing is not much better toward Nomans. It has been hard to make a day's pay on fluke alone.

Coincidental with the lack of fluke we have experienced an increase incidental catch of sea bass in June and early July. The ASMFC has given Massachusetts an increase in sea bass quota and *Marine Fisheries* has proposed a 100 pound incidental catch for trawlers during the commercial fluke season. We feel it is only fair that the hook fishermen be given an incidental catch of sea bass also. We propose a 100 pound incidental catch of sea bass for the hook fishery from the opening of the fluke season on June 10 until the start of the directed commercial sea bass season.

Drew Kolek



**From:** [drew.kolek](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Sea bass proposals - trip limits, open days, and season.  
**Date:** Saturday, March 14, 2020 8:47:30 AM

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Dear Acting Director McKiernan:

I am in favor of maintaining the existing three day per week open sea bass commercial season. As the overwhelming majority voiced at last year's hearing I prefer the current open days of Sunday, Tuesday and Thursday. This will spread out the fishing week and allow for missing a day in case of bad weather.

Rather than increase the daily trip limit I would prefer to have the season open earlier. The increased daily limit will tend to drive down the price of the fish. By opening the season earlier the markets will be stabilized and price will be maintained.

Drew Kolek

**From:** [Chris Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Comments for Management 2020  
**Date:** Sunday, March 15, 2020 11:09:36 AM

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Dear Dan McKiernan

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

**If this not a red flag warning of a fishery in trouble**, I do not know what is a better example. Also, we can see that overall fish mortality, in recreational and commercial striped bass, of fully-recruited fish has continued to spiral downward since 2012 which further leads to biomass loss. Additionally, we have not even touched on the striped bass by-catch mortality from trawlers off Massachusetts, or the effects of predation on striped bass, such as seals and sharks.

We cannot deny the effects of climate on striped bass as we have seen increasing issues in the spawning grounds, such as the Chesapeake Bay, with warming temperatures, algae blooms and reduced young of the year population. One can ask why the commercial fishermen did not meet their quota. The answer is clear and simple, they could not catch enough fish. Why? Because we have depleted them and they just do not exist. The larger fish have been previously caught and removed from the population and those larger fish are the big breeding females

that produce more eggs and are the sustainers of the striped bass population.

I feel that we need to take several drastic measures.

- First- we need tackle restrictions, no treble hooks at all, circle hooks only on lures and live/cut bait. The goal is to do no harm to the fish that are caught. Have fun catching them but do no harm. (see photo)
- The current options proposed are not responsible enough to help the fishery. We need the most conservative approach.
  - THERE SHOULD BE NO SLOT LIMIT
  - The recommendation should be a total size limit of 40" for all anglers commercial and recreational – GOAL IS TO KEEP MORE FISH IN THE BIOMASS
- Additional we need to re-evaluate the data in 2021 and strongly consider is totally close this fishery in all 13 states for both commercial and recreational striper fishing. They did this exact thing in the early 80's and it worked.

I am not forwarding such recommendations without offering to help. Please feel free to contact me to help in anyway, such as collect data, analyze data or help organize meetings, or whatever you need. The goal is to have a sustainable fishery for all anglers recreational and commercial alike, this is all of our responsibility. Massachusetts needs to lead the way.

Very Respectfully-

Chris Ryan

Former Biology Major St. Michael's College

Chief Physician Assistant Cardiac Surgery at Cape Cod Hospital

5 Pioneer Path

West Barnstable, MA 02668

[cjryan93@yahoo.com](mailto:cjryan93@yahoo.com)



Note Injury - large hole in fish's lip.

**From:** [Rick Jordan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regulation changes 2020  
**Date:** Sunday, March 15, 2020 5:32:23 PM

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I am writing to ask you to adopt the most conservative regulations on both commercial and sportfishing for striped bass. Based on my fishing in the past 3 years, the population is dropping and raising great concern. Whatever stripers arrive in Maine have migrated through coastal waters of Massachusetts so we need your help.

4 years ago, my wife and I bought a house near Portland's Casco Bay so we could fish regularly. This was a \$120,000 expense on our part, so we want good striper fishing.

Thank you for your consideration.

Rick Jordan  
North Yarmouth, Maine

**From:** [Seth Adams](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass regulation comment  
**Date:** Sunday, March 15, 2020 12:56:26 PM

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Hi Daniel,

Please accept this comment / request as I have been attending the meetings at mma for years.

My comment / request is to have the for-hire vessels and license holders follow a reporting structure similar to the commercial fisherman . They would need to report their client catches on “rec days “ as well as “commercial days”. The newest rules seem to be making special exceptions for this group and during my years of attending meetings they seem to get a some extra attention. I think it helps to bring some clarity around how much of the catch is indeed individual Rec fisherman vs for hire vs commercial. The data points will help form future decision making and help inform if future rules do need to continue to differentiate the three groups. Any questions or comment about this please email me or call me . 508 889 8175

Thx,

Seth Adams

Sent from my iPhone

**From:** [hhdecoys@aol.com](mailto:hhdecoys@aol.com)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striper regulations  
**Date:** Sunday, March 15, 2020 5:50:34 PM

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Going to a slot limit is the best available option for the coming year.

All anglers both commercial and recreational should have to use Circle Hooks and should not be allowed to use gaffs.

I am concerned that Commercials are not required to tag their fish as soon as they're caught and there is no reason to open the Commercial season early or to change the open days. The recreational fishermen are the ones pouring money into the States economy the Commercials are doing their best to destroy it by killing off the large breeders.

Thanks for your time

Robert Mosher

16 Water St.

Hingham, MA 02043

**From:** [William Giokas](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Slot limit  
**Date:** Monday, March 16, 2020 2:41:28 PM

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I support 1a limit . William Giokas



**From:** [Mike Pavlov](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Management Plan Comments  
**Date:** Monday, March 16, 2020 2:01:26 PM

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March 16, 2020  
Attn: Acting Director Dan McKiernan

Dear Dan,

Thank you for reading my comments on proposed Striped Bass Regulation changes.

Like many, many others, I have seen the decline of Striped Bass to such a significant degree, if I could, I would vote to for zero harvest of any bass at all. That is until they could recover to the point where everyone of any financial status and location along the MA coast, would have a reasonable chance of success when fishing for them. That's not the case anymore.

I know zero harvest is not an option right now. ***So therefore please add my vote to be the most conservative possible measures for both recreational and commercial quota's.***

Why I'm voting this way:

#### 1. Recreational Fishery

I know you've heard this already. The poaching is rampant. I see it from shore (cape cod canal) and from my friend's boat (cape cod bay). I don't want to dismiss the science behind striped bass management but I never see estimates regarding poaching numbers as they relate to the such. There are just too many people who don't care about the future.

#### 2. Commercial Fishery

One evening after work my brother and I were fishing in his boat inside the harbor at Saquatucket. We saw some small swirls along the mudbanks so we stopped to try to catch small striped bass on our fly rods. We had fished for hours on the outside and saw nothing.

It was the day before a commercial day and we witnessed one boat after another, 24-26 footers, in almost all instances, one person per boat, heading out for open waters. These were "commercial" fisherman going out well before the commercial hours started, after work from their real jobs, to supplement their fishing hobby. Over a dozen boats went out. Do they get out to the rips 4 hours early and just sit there waiting for the commercial clock to start? I can't even afford a 14 footer right now and these boats cost in the 10s of thousands dollars, if not 100+ thousand.

I know the commercial harvest is only 10% of the recreational harvest. But there has to be some way to legitimize the fishery for true commercial fisherman.

The notion of depleting a treasured natural resource for the sake of someone making extra bucks to pay for their hobby is really disturbing.

Anyway I just wanted to provide these observations to help you understand where my vote is coming from.

Thank you for your time,

Mike Pavlov  
Brewster, MA

**From:** [alvin piper](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regs  
**Date:** Monday, March 16, 2020 5:31:20 PM

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Hello, Am I to understand that new regulations waiting to be passed regarding striped bass are: commercial length to keep is 35 in and up, still 15 fish per day and for the sport fisherman the keeper slot is 28in to 34in and keep one. If this is accurate and is supposed to be beneficial to the stock than someone needs to explain to me. My thought process must be 180\* out. The commercialists have not met their quota for at least the past two years so why let them harvest the brood stock which has a negative effect on the resource and not switch it around to 15 fish of 28in to 34in for commercial guys, which I'm sure they can fill and the sportsman can keep the 35in and up one a day, and BTW I am a sport fisherman that releases everything and I do NOT bait fish. This seems to me to have less of a negative impact on the bass. Please can we finally do something that results positively?

Thank you,  
Alvin Piper

**From:** [Gary Speed](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass Commercial harvesting is killing the State of Maine recreational fishing!  
**Date:** Friday, March 13, 2020 2:09:13 PM

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I am a teacher who has lived in Maine all my life. I have been fishing for striped bass for 25 years. The amount of fish we seen has gone down tremendously in the last 10 years! Please have more restrictive laws on Commercial fishing. We see very few big fish and hardly seen any big schools of fish anymore. I am a avid fly fishermen and release everything and it is very sad of what we have done to maintain this wonderful fish over the years. Tourism and recreational fishing is so important in the State of Maine, NH , and all of our New England States! Please pass this on as you contimplat the up in coming year of making laws! Thank you

**From:** [Stephen](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped bass provisions  
**Date:** Friday, March 13, 2020 3:28:14 PM

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Dear Mr. McKiernan:

I am writing you today to express my opinion on two specific provisions regarding striped bass that are being proposed.

1. I am strongly IN SUPPORT of the proposed SLOT LIMIT. As an avid angler who has fished the waters of Massachusetts for over 40 years, I am very concerned about the current state of the fishery. Although the numbers of fish may seem normal, there is a stunning lack of diversity in terms of the size and weight of fish. Every fish caught seems to be 25-28 inches long and underweight. This is a signal of an unhealthy fishery. I think a slot limit would be an excellent tool with which to address this lack of size diversity. Specifically, we need to protect the large breeding females. They are the key to ensuring a healthy striped bass fishery.

2. I am OPPOSED to the CHANGE OF THE START OF COMMERCIAL SEASON, for there will be far more large breeding females vulnerable to commercial catch. As I stated before, the health of our striped bass population depends upon protecting these large females.

I have more thoughts on how we can ensure the future of striped bass in our waters, but I feel the above two proposals are of utmost importance right now.

Thank you very much for your attention to this important matter.

Yours truly,

Stephen H. Rogers  
Nantucket, Ma

Sent from XFINITY Connect Mobile App

**From:** [Dan Connors](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Friday, March 13, 2020 1:53:54 PM

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Please see my thoughts that run along the same lines as "Stripers Forever".

Thanks for you time,  
Sincerely,  
Dan Connors

1. Both recreational and commercial anglers out to be subject to the same rules regarding the use of circle hooks. [***J hooks kill no matter who is using them***]
2. The "no gaff" rule ought to apply to commercial anglers as well as recreational anglers. [*same reasoning as above*]
3. Opening the commercial striped bass season before July 1 is wrong. [***opening it earlier exposes large migratory breeder females to increased harvesting***]
4. Changing the open days for commercial harvest to Monday and Wednesday is wrong [***hurts the legit. Commercial fisherman by encouraging part-timers***]
5. The proposed slot limit is acceptable [***the 18% harvest reduction is necessary***]

**From:** [Robert Frisbie Sr.](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Cc:** [Frisbie Kim](#)  
**Subject:** Striped Bass  
**Date:** Friday, March 13, 2020 2:10:33 PM

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Dear Mr. McKiernan, I'm sorry to take up your valuable time so I'll keep my email very short. I've fished the waters from New Jersey to Maine for approximately 53 years. I was educated in Cambridge and have a home on Nantucket. I've continually fished the Nantucket waters since 1972. I'm old enough to have witnessed the almost total destruction of the striped bass species in the 80's until we had the moratorium for the entire east coast. It's clear with our Massachusetts (as well as the east coast) yearly fishery data, that fish stocks are depleting rapidly. I think it's time to severely limit recreational and commercial striped bass fishing or perhaps prohibit it entirely (until the species recovers). Winston Churchill said in a 1948 speech to the House of Commons, "those who fail to learn from history are condemned to repeat it". I'm sure you'll make the right decision for the striped bass as well as mankind.

Thank you for your time.

Robert Frisbie  
42 Easton St  
Nantucket, Ma 02554  
215-327-0444

**From:** [JARRETT DRAKE](#)  
**To:** [Fish, Marine \(FWE\)](#); [Fish, Marine \(FWE\)](#)  
**Cc:** [Silva, Jared \(FWE\)](#); [McKiernan, Dan \(FWE\)](#)  
**Subject:** Public Comments on draft regulatory amendments to 322 CMR §§6.00, 7.00 and 9.00  
**Date:** Wednesday, March 18, 2020 4:51:10 PM

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**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 Acting Director Daniel McKiernan,

Please accept my comments on draft regulatory amendments to 322 CMR §§6.00, 7.00 and 9.00 as public comments to said amendment.

### **Commercial Black Sea Bass (322 CMR 6.28).**

I would like to propose a daily trip limit of 500lbs for the few commercial trap licenses and 200lbs for the commercial rod and reel sector as it was in the past. With the 59% quota increase, we are close to historical quotas when these limits were acceptable to a sustainable and still profitable fishery. The 500lb increase would at most equate to an approximate 12,000 - 13,000 pounds of weekly quota if almost all of the commercial trap fishermen were to successfully catch their maximum allocation, which is unlikely due to weather, fish-ability, and potential other factors. The commercial sea bass trap permits are significantly more expensive than the rod and reel permits, ~\$35,000 to \$30. And, we have a significantly higher equipment bill for the cost of traps, bait, and fuel to catch our quota.

400lbs is an appreciated offering, but still not quite enough to make black sea bass a viable targeted fishery. It will most likely still be a complementary fishery to lobstering or something else. I urge you to please consider the 500lb and 200lb proposal realizing its minimal impacts on the overall quota and significant benefits to the commercial trap sector while keeping the existing three day schedule.

I have always opposed weekend fishing days for any quota managed fishery. If there is consideration to a two day per week schedule, and I don't condone this, but I would like to be able to address the fishery as profitably as possible by asking for a 700lb/day quota on Monday and Thursday. Perhaps the striped bass can be moved to Sunday since it has been under-utilized the past few years?

### **Commercial Menhaden (322 CMR 6.43, 7.01, 7.04 and 7.06).**

Due to the significant reduction in herring quota, many lobstermen are starting to implement catching their own bait targeting menhaden. To hastily impose a control date without letting the bait market stabilize may



be detrimental to lobstermen throughout the State. I would ask you to reconsider a control date to 2023 or later to allow this disruption in the lobster bait market to even out while lobstermen adapt to catching their own source of bait. It is a learning curve that shouldn't be stripped away once practiced. Any lobsterman who is willing to source his own bait, should be allowed the chance to learn how to do it, now and and for the future.

I have also been a strong advocate that ALL State held licenses be owner/operator. Letter of authorizations can be issued to State approved fishermen that want certain exemptions to this.

Thank you for the opportunity to comment on this proposal. I hope you strongly consider my recommendations. I feel I can speak for the majority of the commercial sea bass trap fishermen with what I have proposed.

Jarrett Drake  
508-789-9809

**From:** [Thomas Currier](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass comments  
**Date:** Tuesday, March 17, 2020 4:39:15 PM

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**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 would like to comment on Addendum VI to Amendment 6 of the Interstate Fishery Management Plan. Despite the efforts by some state agencies to grab a greater share of the fish than allotted by the ASMFC required 18% reduction, I feel that Massachusetts should set the standard and propose a "no take" catch and release striped bass fishery. The moratorium enacted on both recreational and commercial striped bass fisheries in the past resulted in the most successful management success story that the ASMFC has ever achieved. Striped bass fishermen often state that they need to bring home a fish for the table but I believe that those same fishermen would much rather have a healthy fishery available to enjoy.

Best regards,  
Thomas Currier

Sent from [Mail](#) for Windows 10

**From:** [Chris Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Tuesday, March 17, 2020 5:03:48 PM

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**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 **Dan McKiernan**

I am writing in regards to our fishing resources in Massachusetts, specifically our Striped Bass population. The concern from people like myself as well as other anglers, is the continued decline of the biomass stock. As the data indicates, the available biomass continues to decline which we have noted both as recreational and as commercial fisherman. This is an issue for all anglers, both commercial and recreational. We have some good data from commercial fishery, but not as well tracked in the recreational fishery, as they are mostly self-reporting. Although, a recreational mortality of 9% is real. From 2013 to 2017, we have seen the catch rates for just the commercial fishermen alone rapidly decline. Currently, the commercial industry has not been able to fill its quota. Additionally, we have seen recreational anglers have reduced catch rates. In 2013, recreational anglers caught almost 600,000 striped bass and then noted a marked decline over the past several years. In 2017, only just over 340,000 fish were caught. (Data: from NOAA recreational angler: MRIP)

**If this not a red flag warning of a fishery in trouble**, I do not know what is a better example. Also, we can see that overall fish mortality, in recreational and commercial striped bass, of fully-recruited fish has continued to spiral downward since 2012 which further leads to biomass loss. Additionally, we have not even touched on the striped bass by-catch mortality from trawlers off Massachusetts, or the effects of predation on striped bass, such as seals and sharks.

We cannot deny the effects of climate on striped bass as we have seen increasing issues in the spawning grounds, such as the Chesapeake Bay, with warming temperatures, algae blooms and reduced young of the year population. One can ask why the commercial fishermen did not meet their quota. The answer is clear and simple, they could not catch enough fish. Why?

Because we have depleted them and they just do not exist. The larger fish have been previously caught and removed from the population and those larger fish are the big breeding females that produce more eggs and are the sustainers of the striped bass population.

I feel that we need to take several drastic measures.

- First- we need tackle restrictions, no treble hooks at all, circle hooks only on lures and live/cut bait. The goal is to do no harm to the fish that are caught. Have fun catching them but do no harm. (see photo)
- The current options proposed are not responsible enough to help the fishery. We need the most conservative approach.
  - THERE SHOULD BE NO SLOT LIMIT
  - The recommendation should be a total size limit of 40" for all anglers commercial and recreational – GOAL IS TO KEEP MORE FISH IN THE BIOMASS
- Additionally we need to re-evaluate the data in 2021 and strongly consider is totally close this fishery in all 13 states for both commercial and recreational striper fishing. They did this exact thing in the early 80's and it worked.

I am not forwarding such recommendations without offering to help. Please feel free to contact me to help in anyway, such as collect data, analyze data or help organize meetings, or whatever you need. The goal is to have a sustainable fishery for all anglers recreational and commercial alike, this is all of our responsibility. Massachusetts needs to lead the way.

Very Respectfully-  
CJ Ryan

**From:** [Michelle Ryan](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Striped Bass Regulations  
**Date:** Tuesday, March 17, 2020 5:05:30 PM

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Very Respectfully-

Michelle Ryan

**From:** [Edward Barrett](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Summer flounder comments  
**Date:** Wednesday, March 18, 2020 4:28:07 PM

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To Acting Director Dan McKiernan,

In regards to the 2020 summer flounder summer period management program I believe The state should maintain the status quo landing limit(300 lbs per day).

Edward Barrett

**From:** [cskeezzer](#)  
**To:** [Fish, Marine \(FWE\)](#)  
**Subject:** Seabass/scup season ideas  
**Date:** Wednesday, March 18, 2020 7:02:32 PM

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**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.

To whom it concerns. My name is Chris Stowell and have been involved in fishing for 35 years. I run the fishing vessel Jom Dandy which my dads had handed down to me and now been running full time for 10 years or so. We have had a seabass pot permit since 2003 and scup pot permit since 2005. I would like to recommend maybe a small bye catch of seabass in may for like 3 days with the scup season of 50 pounds. Maybe a small increase in May on scup to 1,000lbs. In June keep the 1000lbs limit on scup at 5 days a week and July increase the scup to 2000lbs. Seabass should be open July 1st too to go along with the scup. Would like to see the limits to go up a little on a 3 day season or a 2 day season of Tuesday/Thursday at 500lbs on seabass. The scup increase would help us catch the quote better when the fish are here. By the end of August they have left most of the areas were alot of us fishermen fish. Thanks for read this over and look forward to your decision...

Sent from my Verizon, Samsung Galaxy smartphone