



Mid-Atlantic Fishery Management Council
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Phone: 302-674-2331 | FAX: 302-674-5399 | www.mafmc.org
Richard B. Robins, Jr., Chairman | Lee G. Anderson, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

MEMORANDUM

Date: 7/29/2015
To: Council
From: Jason Didden
Subject: Blueline Tilefish Comments and Decision Points

On August 11, 2015 the Council is scheduled to review the scoping comments regarding blueline tilefish and decide how to proceed regarding blueline tilefish management. Following this page are summaries of the public hearings and individual comments that were received during the scoping period. The scoping document can be viewed at <http://www.mafmc.org/actions/blueline-tilefish>. There were no attendees at the June 1, 2015 Riverhead, NY meeting or the June 16, 2015 Manteo, NC meeting so no summaries exist for those meetings.

The Council will need to decide whether to use an Amendment to the Golden Tilefish Fishery Management Plan (FMP), a new FMP for blueline tilefish, or a new FMP for deep water species to address blueline tilefish management. Staff recommends using an Amendment to the Golden Tilefish FMP – an Amendment to an existing FMP should proceed faster than a new FMP and the blueline tilefish emergency rule for the Mid-Atlantic will expire relatively soon (June 5, 2016 assuming one extension).

Once the Council provides an indication of its general intent, we will form a Fishery Management Action Team (FMAT) and the FMAT will begin developing alternatives and associated analyses. Council staff expects that the FMAT will develop a range of alternatives for the Council to approve in October including a basic suite of FMP measures (e.g. management unit definition, ABC control rule, stock status criteria, permitting, reporting requirements, trip limits, and EFH). Staff will then build the alternatives and associated analyses into a draft Environmental Assessment that will be used to solicit public input on the relevant alternatives before Council action at the February 2016 meeting. A draft Action Plan follows the comments and is at the end of this section.

2015 Blueline Tilefish Management Scoping Hearing Summaries

Introduction

This document summarizes the comments received at the three June 2015 scoping hearings for blueline tilefish that were attended (Cape May, NJ; VA Beach, VA; Ocean City, MD). There were no attendees in Riverhead, NY or Manteo, NC. Council staff (Jason Didden) provided an overview of the scoping document at each hearing, and then a Council Member opened up the floor for comments. A summary for each hearing follows.

Cape May, NJ at Congress Hall. June 2, 2015

Attendees

Jason Didden (MAFMC)

Tom Baum (NJ F&W, MAFMC)

Erling Berg

Jeff Gutman

Dave Arbeitman

Jim Cicchitti

Josh O'Connor

Tom Whitehead

Mac Bishop

Marty Buzas

Jasen Hansen

Brady Lybarger

Dan Kulsar

Summary: There appeared to be a consensus that the Mid-Atlantic Fishery Management Council should manage Mid-Atlantic blueline tilefish. A variety of specific ideas were also presented.

Note: Tom Baum and Erling Berg updated the attendees on actions underway by New Jersey regarding blueline tilefish. It is expected that New Jersey will implement similar regulations as those requested by the Council to NMFS, but the exact timing is uncertain.

Recreational Participants

- The Council needs to be involved in blueline tilefish – forced into it. There are only a handful of commercial and recreational boats involved on a consistent basis, so there is not much information available.

- We need a stock assessment for Mid-Atlantic fish, which are more abundant than in South Atlantic.

- The other species (grouper/barrelfish/wreckfish) are only occasionally caught. It seems like for the other species there are not enough encounters to justify the expense of management.

- Going to 1 fish per boat will kill the boats that are deep dropping – it is a closure.

- If there is a big issue should go to limited access for blueline tilefish since only a few vessels are participating. Should consider different limits for the for-hire fleet that need enough fish to run a business and support their family. The for-hire participants are more dependent on tilefish and the 4 headboats that fish regularly for tilefish are most dependent on tilefish - their

dependence and history should be considered if access needs to be limited. The folks who have come to the hearings are the ones who are dependent on this fishery and need priority access. Don't want a Wild West situation of people trying to get history – you need a control date, preferably retroactive.

- There is not a lot of interest in this fishery – it shouldn't be that hard to start management that works for those who are interested and have a stake.

- You do not need a separate reporting system for for-hire vessels since they already submit VTRs. I do not trust MRIP data for any fishery, especially tilefish. May need separate reporting for the private boat fishery. This fishery could be particularly impacted by MRIP estimates and extrapolations and MRIP data should be treated as anecdotal.

- This looks like a kneejerk reaction to the South Atlantic's action. The first thing we need is a stock assessment, and most scientists are of the opinion that we have our own stock of bluelines. There has been an explosion of bluelines of every size possible – it seems like the stock in our area is robust. We are more than willing to help gather data that could help an assessment.

- You can't put a 2-day trip together based on a handful of fish. New Jersey (NJ) fishermen are at a disadvantage with a 7-fish limit relative to Maryland/Virginia because NJ trips are 2-days and Maryland/Virginia fishermen could make two trips in 2 days. The 7-fish limit is arbitrary without sufficient scientific justification. You should consider a different multi-day trip limit (not necessarily X fish per day, but a different limit for trips that are out over 24 hours).

- Deep-drop fishing tackle sales have become an important part of some tackle shops' business, and I am getting reports of bluelines from as far northeast as Veach Canyon (~150 miles ENE of Hudson Canyon).

- I would prefer a separate blueline plan to avoid confusion when developing management measures, and would prefer to avoid a blended golden/tilefish trip limit. Golden tilefish management seems settled.

Commercial Participants

- 7 fish per trip may be workable for a for-hire fishery, but 300 pounds is not viable for commercial participants and there is no accurate study to support such restrictions. There are more fish than people think and it is only recently that more people are targeting them. 300 pounds will put me out of business.

- 300 pounds will not cover expenses for a commercial trip and we have been pushed out of other fisheries.

- North Carolina is at a disadvantage commercially relative to South Atlantic management because the quota gets closed before fishermen in North Carolina have access to the fish.

- Blueline tilefish are like vacuums and eat everything else, and shutting down the fishery will cause problems for other species that are eaten by bluelines.

- Blueline tilefish do move around like golden tilefish – sometimes are in one spot and not the same spot a week later (and vice-versa), 45-100 fathoms on hard/live bottom. They move to

where the food is. Some areas seem to have fish at that spot all the time, some areas seem to have fish that move in and out within a depth range.

- Limited entry for blueline tilefish should be considered – there have been few participants but once some catches were made then other people got interested and you don't want 20 more vessels participating. Should publish a control date and consider primary access for those who have had the most direct past participation. An IFQ might not be the right way to go because it shuts people out.

- The folks who have come to the hearings are the ones who are dependent on this fishery and need priority access.

- I just started blueline tilefish fishing because other fisheries are very limited and I'm trying to provide fresh seafood for my restaurants. In favor of management that allows current participants access but need a higher limit to allow folks to scratch out a paycheck. You can also get more than 300 pounds incidentally and a 300 pound limit could cause regulatory discarding. Might need different Tiers or an IFQ to match histories and provide certainty for participants.

- I don't think that many people are going to jump into this fishery.

- How are you going to figure out how many fish are out there if the fishery is closed? How are you going to get the data? The fishermen who have been catching the fish should have an opportunity to collect data. They know the area and the fish.

- Cutting commercial fishing out makes no sense and we will not fish anything totally down.

- For starters a 7-fish recreational, 15-fish recreational/commercial, and 500-600 pound commercial trip limit seems reasonable until more science is available. Need a number that keeps new people from jumping in but can support existing participants. Shouldn't pull the rug out from under people without solid research.

- It's not an even playing field for commercial boats to be limited to 300 pounds and for a headboat to keep 7 fish per person, which can result in a lot more than 300 pounds of fish.

- It is disgusting to have an emergency closure because we don't have data – NMFS staff should also have their pay taken away until they get the data. It would be like we came to managers and said we don't know why, but you can only work and get paid for 10 hours of time a week.

- This is the first meeting I've been to where there's no science to back things up. You should give us something to work on while you develop the science. I've caught 1-pound fish that are full of roe, so I do not think they are slow-maturing. We are more than willing to help gather data that could help an assessment.

Virginia Beach, VA at the Virginia Beach Hilton. June 17, 2015

Attendees

Jason Didden (MAFMC)

Lanie Avery

Rick Robins (MAFMC)

Wes Feller

Mike Avery

Summary:

Mike Avery reiterated the positions reflected in the written comments he submitted on behalf of the Virginia Saltwater Sportfishing Association (VSSA). The VSSA letter is included later in this tab, and generally supports Council management of blueline tilefish but supports a more restrictive combined tilefish (golden plus blueline) limit of 7 fish per person, which is the current Virginia regulation. VSSA also supports including grouper with a 1 grouper per person limit. His charter operation is very dependent on tilefishing. He added that the spots where he first started tilefish fishing are not as productive but with some work it is still possible to put together a limit. He also indicated that in addition to directed deep-drop trips, blueline tilefishing is an important option for offshore charter vessels when trolling for pelagic species is not productive. He also noted that on nice days there can be quite a few private vessels that may spend at least some part of their day tilefishing (though their catch rates may be lower than charter boats) and that increasing spiny dogfish abundance in the mid to late 2000s ruined winter blueline tilefishing. He opposed consideration of a limited access system for party-charter permits, and noted that few for-hire operators are aware that they need a NMFS Federal Northeast tilefish permit from GARFO for blueline tilefish. He also stated that it was not clear to him that a boat fishing out of Virginia would have to abide by the South Atlantic's 1 fish/day regulations in federal waters south of the Virginia/North Carolina border.

Wes Feller indicated that written comments would be submitted on behalf of the F/V Rudee Angler, and those comments are included later in this Tab. Those comments generally support Council management of blueline tilefish and that a seven fish bag limit is able to satisfy anglers without harm to the fishery but they would not be able to sustain their business with a lower bag limit. The comments also state that this fishery could not sustain a directed commercial fishery and that additional research is needed.

Ocean City, MD at the OC Chamber of Commerce Visitor Center. June 18, 2015

Attendees

Jason Didden (MAFMC)
Howard King (MAFMC)
Kerry Harrington
Tony Battista
Ron Callis
Frank Pettulina
Phil Cathell
Dan Stouffer
Lou Schultz

Gunnar Zorn
Wayne Lauman
Darren Helwig
Alan Rittmeyer
Mark Radcliffe
H.D. Parsons II
Steve Ellis (NOAA)
Ed Dorang

Summary: There appeared to be a consensus that the Mid-Atlantic Fishery Management Council should manage Mid-Atlantic blue-line tilefish and that one coast-wide assessment would be inappropriate. A variety of specific ideas were also presented:

Recreational Participants

- There was near consensus that all areas should have a 7-fish combined trip limit. It's too many fish to have 7 blue-lines and 8 golden tilefish for 15 total per person and doesn't seem sustainable. The VA/MD rules are working and you could just continue that to the north. H.D. Parsons from Lewes, DE stated that a 7-fish combined limit would severely hurt his headboat business.
- There was general consensus that attendees were not in favor of limited access for the for-hire fleet.
- NMFS should use charter boats for data collection – we know just where fish are caught.
- It seems like the guys out of North Carolina going into New Jersey are the problem – are there any controls on where they can land? Take the rotten apple out of the barrel and leave the rest. We shouldn't have to pay a price for the folks down south squashing our fish.
- In 2012 there was a spike in the VTR reports, and it might have occurred because in 2012 NMFS told me that I had to report all fish when before they told me only to report black sea bass and tautog. So in 2012 I started reporting tilefish also and if that occurred with other people that may have led to the spike.
- Some other data collection besides MRIP should be considered for private boat data collection.
- The 1 fish per boat option seems crazy – there will be no fishing for them at 1 fish per boat.
- There's only a few boats that totally focus on tilefish – mostly it's a case of a boat out fishing for something else and they target tilefish for part of a trip especially if the primary pelagic targets are not biting.
- What are you going to base quotas on if you do manage blue-lines?

Commercial Participant (1)

- There are directed fisheries ongoing that NMFS can use for data. NMFS knows exactly where I'm at and what I'm doing.
- 300 is not enough on the commercial side to make a trip, 500 would be better, and would be fairer given what the recreational limit is and what a boat can catch under the recreational limits.
- Low limits can cause waste as the fish won't survive being caught.
- I have to fill out 7 trip reports per trip and that is not reasonable.

2015 Blueline Tilefish Management

Written Scoping Comments

Follow This Page

Didden, Jason

From: barclay shepard <barclayshepard@yahoo.com>
Sent: Monday, July 06, 2015 8:17 PM
To: Didden, Jason
Subject: Blueline Tilefish

I am writing as a recreational angler in Virginia who fishes for blueline tilefish along the Atlantic Coast. As a recreational angler, I am concerned about the stock of blueline tilefish and future management of this important recreational fishery. I have fished on my private boat and on charter boats for blueline tilefish for approximately 7 years in Virginia. This has been a fantastic fishery for recreational anglers, particularly in the Winter/Spring months when there are few other species to target. My crew and fishing club members in the Peninsula Saltwater Sport Fisherman's Association, have enjoyed this emerging fishery which provides us with a unique opportunity to target a fish that makes great table fare. The Virginia Saltwater Fishing Tournament added blueline tilefish to the recreational citation program several years back. This has proven to be one of the most coveted fish in this annual tournament with multiple state and world records recorded in Virginia. This long-distance fishery (about a 90 mile trip from Hampton, Va) has been one of the few and somewhat reliable offshore fisheries out of Virginia.

I would like to see the Mid Atlantic Fishery Management Council add blueline tilefish to the Golden Tilefish Plan immediately before emergency measures expire. I hope the Council can build on the regulatory history developed in Virginia and Maryland. In doing so, I hope that the Council will be able to develop appropriate stock assessments for blueline tilefish so that this fishery can flourish in the future.

If you have any further questions, please let me know and I would be happy to comment further. Your decisions greatly effect the recreational fishing community in Virginia and in the Mid Atlantic. Please try to take this in mind as you look at regulating this important recreational fishery!

Sincerely,

Barclay M. Shepard

Didden, Jason

From: Squarespace <no-reply@squarespace.com>
Sent: Monday, June 01, 2015 4:49 PM
To: Didden, Jason
Subject: Form Submission - Blueline Tilefish Scoping Comments

Name: Andrew Ciok

Email Address: aciokssp@gmail.com

If you are representing an organization or a group of people other than yourself, please indicate below:

Comments: gentlemen:

Could someone please explain to me how you can determine that the blueline tilefish fishery in the Mid-Atlantic is in trouble, when you have no stock- assessment for this area, no use of vessel trip reports (MRIP), and uncorroborated dockside survey sampling.

Additionally, do you really expect a blueline tilefish to survive, having been brought up from a depth of 400' - 1,000', after the 1 fish per boat limit has been met?

Oh, maybe we can hang a sign on our hooks that says "Blueline tilefish, please do not take this bait or jig as the boat above you has already met it's one fish limit. Thank You and Have a Nice Day."

Or maybe the reason is because you want to try and stop the N. C. fishing vessels from landing tilefish in N. J. where there are no catch limits in place. Maybe you should have the Dept. of Commerce actually figure out a way to enforce the regs that are presently in place.

Regards

Andrew Ciok

(Sent via [Mid-Atlantic Fishery Management Council](#))

Didden, Jason

From: Skip Feller <sfeller3@verizon.net>
Sent: Monday, July 06, 2015 10:21 PM
To: Didden, Jason
Subject: Blueline Tilefish

> Dear Members of the Mid Atlantic Council,

>

> I am a head boat operator out of Virginia Beach, VA whose business relies greatly on the Blue Line Tilefish fishery. Back in 2007, we in Virginia saw an increase in the demand for Blue Line Tilefish and have built our business around a directed fishery of Blue Line Tilefish with a seven per-person bag limit. I believe the seven bag limit is able to satisfy the demand without harm to the fishery. With a bag limit of any less we would most likely not be able to sustain our business. I also believe this fishery could not sustain a directed commercial fishery and I support the 300 pound trip limit.

>

> Our offshore deep-drop trips target the Blue Line Tilefish along with deeper species such as Rose Fish, Wreck Fish and Barrel Fish; however, it is not always possible to fish the deeper waters. If the bag limit decreased on the Blue Line it would be devastating for business. Most of the time, catching the seven fish limit is not too difficult which most likely indicates their population is still stable, even after 8 years of a seven fish bag limit.

>

> We in Virginia feel strongly about the Mid Atlantic Council continuing to manage the Blue Line Tilefish fishery. Due to the fact there are no MIRP reports, the VTR's are all there is to go on, so we also strongly encourage the Council to study the Blue Line Tilefish from the Virginia/North Carolina line north.

>

> While I can only speak for the head boat company, I am sure that the other deep-drop offshore fisherman in Virginia and Maryland will agree that any less than a seven bag limit would be detrimental to their businesses and that the best way to ensure there is no damage done is to not only continue having the Council regulate this fishery, but also to have the Council study the Blue Line Tilefish.

Sincerely Skip Feller
F/V Rudee Angler

> Sent from my iPhone 6 Plus

Didden, Jason

From: Squarespace <no-reply@squarespace.com>
Sent: Monday, July 06, 2015 9:22 PM
To: Didden, Jason
Subject: Form Submission - Blueline Tilefish Scoping Comments

Name: Frank A Florio

Email Address: Thinkboatingsafety@yahoo.com

If you are representing an organization or a group of people other than yourself, please indicate below:

Comments: The commercial Possession limit of 300 lbs per trip is not profitable for my area. the trip to the tile fishing grounds is 100 to 120 miles. the cost of fuel alone makes the trip not worth wile. The recreational limit of 7 fish per person is workable, but again not for my area. the average trip is 2 to 2 1/2 days. these trips require not only a captain crew, but a relief captain and relief crew. the trip miles are again between 100 and 120 miles. I offer for your consideration :
making the possession limits per day instead of per trip.
the areas with shorter distance to tile fishing grounds can fish every day. we cannot
Thank you for your time and consideration
Capt. Frank A Florio 202 Baltimore Ave
Point Pleasant Beach N.J. 08742

(Sent via [Mid-Atlantic Fishery Management Council](#))

Didden, Jason

From: Squarespace <no-reply@squarespace.com>
Sent: Wednesday, June 24, 2015 9:05 PM
To: Didden, Jason
Subject: Form Submission - Blueline Tilefish Scoping Comments

Name: jasen hansen

Email Address: laurenjakob@yahoo.com

If you are representing an organization or a group of people other than yourself, please indicate below:
H&H fisheries Two mile crab house llc FV Nordic sun llc

Comments: In moving forward with managing the blue line tilefish on a commercial level we would like the council to use the june 4th 2015 emergency closure date as a control date for managing the fishery. Moving forward anyone having 2000 pounds or more of landings should be considered as a directed fishery and treated as such ,landing permits or a federal blueline permit would enable the few fisherman in the fishery to continue without larger numbers of fisherman entering at a later date

(Sent via [Mid-Atlantic Fishery Management Council](#))

Didden, Jason

From: Squarespace <no-reply@squarespace.com>
Sent: Monday, June 01, 2015 10:42 AM
To: Didden, Jason
Subject: Form Submission - Blueline Tilefish Scoping Comments

Name: Greg Hueth

Email Address: ghueth@gmail.com

If you are representing an organization or a group of people other than yourself, please indicate below:
Shark River Surf Anglers

Comments: Myself and many club members have been fishing for Blueline Tilefish for decades. We have NEVER seen as many as we have over the last few years. Granted, we only get there 1-2 times a month because the distance we travel to catch them(90-120miles), but there certainly does not seem to be any shortage of fish. Actually there are more places to fish for them now then 10 yrs ago. Closing this season without the proper science to support you argument is unconstitutional. You are going by studies done in the south that have no baring or scientific backing up north. To close a fishery on a theory is just not right!!!!

Please consider the small groups of people that do fish for them up north and the effect it will have on the for hire fleet. We have nothing left to fish for due to all the closures as it is and you now want to take blueline fishing from us without any proof!!!

Than you.

(Sent via [Mid-Atlantic Fishery Management Council](#))

Didden, Jason

From: Daniel Kulcsar <kulcsardan123@gmail.com>
Sent: Saturday, July 04, 2015 10:41 AM
To: Didden, Jason
Subject: Fwd: Mid Atlantic Council

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

From: "Jen Kerstner" <jen.kerstner@gmail.com>
Date: Jul 4, 2015 10:39 AM
Subject: Mid Atlantic Council
To: "Dan" <kulcsardan123@gmail.com>
Cc:

Mid-Atlantic Council:

I am writing to the Council as a plea in consideration of regulations on tile fish on behalf of myself Daniel Kulcsar from the F/V Anna Eileen and other fisherman in my situation.

As an experienced fisherman, I have expressed my knowledge on the blue line tile fish and regulations. This communication serves as suggestions to help not only the understanding of the habits and patterns of the fish but also allowing for those experienced fisherman to continue to sustain their well being.

I suggest the following regulations be put into place:

1. Limited entry into fishery and a baseline for boats to qualify including having at least 15,000 lbs of landings in 2014.
2. Boats that have 5-8 thousand lbs of landings receive an incidental permit to fish 500 lbs a trip.
3. From my experience the spawning season for the blue line tile fish carrying eggs is in the spring. If the season was to open June 15th it would allow to fish the spawn. I am suggesting the season be open from June 15th to Jan 15th.
4. When the season opens a catch limit should be set initially to a 3000 lb limit rather than unlimited.

In addition to the above regulations boats should be encouraged to carry observers for scientific research. This would allow researchers to sample the blue line tile fish on their grounds. To sustain the cost for the research a donation on ten cents per pound could be initiated.

I would like to offer my services to participate in the cooperative research studies to help make an accurate stock assessment for future regulations.

Working collaboratively will allow for more scientific research to better assess how to regulate tile fish. Rather than make regulations based on hypothesis together we can gather data to more accurately understand the habits of the tile fish and their regulation.

Thank you in advance and I appreciate your consideration.

Daniel Kulcsar
Owner F/V Anna Eileen

Sent from my iPhone

Didden, Jason

From: Squarespace <no-reply@squarespace.com>
Sent: Wednesday, June 17, 2015 3:12 PM
To: Didden, Jason
Subject: Form Submission - Blueline Tilefish Scoping Comments

Name: steven magdeburger

Email Address: smagdeburger08@gmail.com

If you are representing an organization or a group of people other than yourself, please indicate below:

Comments: I am strongly opposed to your proposal to drastically reduce recreational catch limits on blueline tilefish and/or golden tilefish across such a broad range of the midatlantic. Show us the science that indicates a shortage in the waters off of Maryland/Delaware along with supporting evidence that the recreational fishery is a substantial contributing factor.

(Sent via [Mid-Atlantic Fishery Management Council](#))

Didden, Jason

Subject: FW: Google Alert - "Mid-Atlantic Fishery Management Council"

From: Monty Hawkins [mailto:capt.montyhawkins@gmail.com]

Sent: Saturday, June 20, 2015 6:18 PM

To: Didden, Jason <jdidden@mafmc.org>

Subject: Re: Google Alert - "Mid-Atlantic Fishery Management Council"

Personally, I think even 3 goldens per-person too high in a boat aggregate, but 10 bluelines would be more realistic -- either that or a two-day creel. (allowing for 2 days a better solution I think..)

I also STRONGLY doubt the "tautog" logic being applied to bluelines.. I bet they're a fast grower/fast spawner.

Lot we don't know.

Cheers,

Monty



July 6, 2015

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

Re: Blueline Tilefish Scoping Comments

Dear Dr. Moore:

The North Carolina Fisheries Association, Inc. (NCFA) is a 501(c)(6) non-profit trade association created by commercial fishermen in 1952 to facilitate the promotion of North Carolina families, heritage and seafood through accessible data about the ever-changing commercial fishing industry. NCFA's board of directors represents all of the state's coastal regions and every facet of the industry, including gear type. The association would like to submit the following comments in reference to NOAA-NMFS-2015-0062-0001: Northeast Blueline Tilefish Emergency Action.

NCFA appreciates the need for action in the blueline tilefish fishery, however, we object to the disparity in the restrictions placed on the commercial fishery implemented by the temporary rule. The 300-pound whole weight commercial trip limit creates a de facto commercial bycatch fishery, although the recreational fishery has been allowed to remain a directed fishery with a seven fish per person possession limit. We respectfully request the council develop more equitable restrictions for its long-term management of this species.

The association appreciates the Mid-Atlantic Fishery Management Council's swift action to fund a genetic analysis of the blueline tilefish population along the east coast beginning this year as well as National Marine Fisheries Service's effort to develop a deepwater survey through the species' range. We are confident this better data will lead to better management; however, we remain very concerned that the Marine Recreational Information Program does not accurately describe recreational anglers' fishing behavior or the impact they have on many fish stocks, especially in the case of rare event species like blueline tilefish. We question the usefulness of the survey on such species, and respectfully request the National Marine Fisheries Service immediately address this issue in order to provide science that is not just the best available, but reliable.

Sincerely,

A handwritten signature in cursive script that reads "Jerry F. Schill".

Jerry Schill, President
North Carolina Fisheries Association

Didden, Jason

From: Eric Schline <eschline@schlinelaw.com>
Sent: Tuesday, June 16, 2015 3:02 PM
To: Didden, Jason
Subject: Blueline Tilefish Scope Comments

Dear Mr. Didden,

Unfortunately, I will be unable to attend the June 18 meeting in Ocean City, MD as I live and work in Baltimore. I do, however, fish recreationally out of Ocean City and often target Blueline Tilefish. I understand that the committee is considering imposing a 1 fish per boat limit for these fish in our waters. While I applaud the committee's recent (emergency) actions to curb the unrestricted commercial harvest of bluelines, and the imposition of reasonable limits for recreational anglers, 1 fish per boat is not a reasonable limit in our waters and essentially closes a healthy fishery for recreational anglers. Out of Ocean City, Maryland and the closest location from our port to catch bluelines is about 50 miles (\$\$\$). If the stocks are in danger (which they certainly do not seem to be), close the fishery. If there is no scientific evidence that the stocks are in trouble impose a reasonable limit. I believe the MAFMC's proposed seven (7) fish per angler limit is reasonable. It allows anglers to catch a enough fish to make a trip worthwhile and put some food on the table while preventing unrestricted overharvesting. Thanks you for your continued efforts to balance the interests of the fish, the commercials and the recs.

Best regards,

Eric Schline

F/V Blackjack, OC, MD

Member, Ocean City Marlin Club

Board of
Directors

Dr. Robert Allen

Jerry Aycock

Mike Avery

John Bello

Bill Dunn

Doug
Ochsenknecht

Bob Reed

Kevin Smith

Curtis Tomlin



June 8, 2015

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

Subject: Blueline Tilefish Scoping Comments

The Virginia Saltwater Sportsman Association (VSSA) is a new and growing organization of recreational fisherman in the Commonwealth of Virginia. Our mission includes representing the interests of Virginia's recreational saltwater anglers, ensuring the long-term sustainability of Virginia's fisheries, while protecting Virginia's marine, boat and tackle industry jobs

VSSA supports the emergency management measures for the blueline tilefish fishery in the Greater Atlantic Region as recommended by the Mid-Atlantic Fishery Management Council. It is imperative this emergency measure be approved as a long term regulation. The VSSA position is that a Fishery Management Plan (FMP) be developed and implemented for blueline tile, golden tile, and grouper as a deep water complex management plan. We don't believe other deep water fish like black belly rose fish need to be managed in this FMP.

It is the VSSA position that reasonable recreational limits be established for these species. VSSA supports the current Virginia regulations which combines blueline and golden tile into a combined 7 tile (golden or blueline) recreational limit as well as 1 grouper per person. We believe that the current 8 golden tile with the new 7 blueline tile per person is excessive and may lead to continued overfishing. A combined limit of 7 tile (golden or blueline) is plenty of meat for any recreational angler or charter/head boat. The FMP and long term management measures should consider Virginia limits for the entire Greater Atlantic region. The SAFMC recreational limits on golden and blueline tile is far too conservative for the mid and greater Atlantic waters. There is far greater pressure on tile in SAFMC waters due to the shorter distances to travel vice the larger distances in the mid and greater Atlantic regions where the pressure is less.

VSSA supports strict limits for commercial fishing of both blueline and golden tile.

VSSA supports mandatory reporting of these species but objects to the current double reporting currently required for charter / head boat operators. Currently a charter and head boat operating in Virginia is required to report catches to both the state and federal government. It is desired that operators only report to a single organization and that single organization share the report with all state and federal organizations requiring that data. Requiring double reporting for a single trip is burdensome on small charter / head boat operations.

Thank you in advance for your consideration.

Respectfully,

Mike Avery, Hampton, VA 757-329-5137, mike@averys.net

Approved by VSSA Board Members

CC: Rob O'Reilly, Virginia Marine Resource Commission
Jeff Deem, Virginia Repetitive to MAFMC

Didden, Jason

From: Squarespace <no-reply@squarespace.com>
Sent: Friday, June 05, 2015 10:39 PM
To: Didden, Jason
Subject: Form Submission - Blueline Tilefish Scoping Comments

Name: Tom Whitehead

Email Address: tcw30@comcast.net

If you are representing an organization or a group of people other than yourself, please indicate below:

Comments: I was in attendance at the scoping hearing in Cape May on June 2nd. I have been a deckhand for the Starlight Fleet for the past 8 years. While I haven't noticed any decline in our catches, I can understand the cause for alarm with the large increase in landings for a fishery that has limited data available. However, I believe the recreational fishery is already restricted by the weather, distance from land, and from January to about mid April there are too many spiny dogfish on the tile grounds. I am not totally familiar with the commercial fishery but I agree that boats with a history of landings should be able to catch more than 300 pounds.

I mentioned to Tom Baum from the NJDEP that I could collect genetic material as well as length, weight, and location data from the fish that we catch, but he said there aren't any funds for the lab work. If a tilefish survey ever happens, I would be interested in helping out as long as it doesn't interfere with my regular work schedule.

(Sent via [Mid-Atlantic Fishery Management Council](#))

Draft Action Plan for Blueline Tilefish Management

Council: Mid-Atlantic

Additional Expertise Sought:

Fishery Management Action Team (FMAT)		
Agency	Role	Person
MAFMC	FMAT Chair	Jason Didden
NMFS GARFO	Sustainable Fisheries – GARFO liason	TBD
NMFS GARFO	Habitat	TBD
NMFS GARFO	NEPA	TBD
NMFS NEFSC	Stock Assessment/Technical	TBD
NMFS NEFSC	Socioeconomics	TBD
NMFS NEFSC	Other	TBD

Title of Action: Blueline Tilefish Management by MAFMC

Objective of Action/Purpose and Need:

The purpose of this action is to implement measures for managing blueline tilefish off the Mid-Atlantic. The goal would be to have management measures that are appropriate for, and tailored to, the needs of the resource and fisheries off the Mid-Atlantic.

Fisheries that Apply: May be done via new FMP or amendment to Golden Tilefish FMP

Types of Measures to be Considered: TBD, but will need to include basic FMP measures including:

- Definition of the stocks and/or geographic range to be managed
- Limits on catch: Acceptable Biological Catches (ABCs) and Annual Catch Limits (ACLs)
- Criteria for overfished/overfishing determinations
- Permitting and reporting requirements
- Commercial and recreational trip/possession limits
- Essential fish habitat designation and related management measures
- Other management measures as required or allowed and deemed appropriate

Type of NEPA Analysis Expected: Document expected to be EA.

Acronym	NEPA Analysis	Requirements
EA	Environmental Assessment	NEPA applies, no scoping required, public hearings required under MSA
EIS	Environmental Impact Statement	NEPA applies, scoping required, public hearings required

Applicable Laws/Issues:

Magnuson-Stevens Act	Yes
Administrative Procedures Act	Yes
Regulatory Flexibility Act	Yes
Paperwork Reduction Act	Possibly; depends on data collection needs
Coastal Zone Management Act	Offshore fishery
Endangered Species Act	Possibly; level of consultation, if necessary, depends upon the actions taken
Marine Mammal Protection Act	Possibly; level of consultation, if necessary, depends upon the actions taken
E.O. 12866 (Regulatory Planning and Review)	Yes
E.O. 12630 (Takings)	Possibly; legal review will confirm
E.O. 13132 (Federalism)	Possibly; legal review will confirm
Essential Fish Habitat	Possibly; level of consultation, if necessary, depends upon the actions taken
Information Quality Act	Yes

Other Issues: At this time, no additional Amendment development issues have been identified.

Timing Issues: Emergency Mid-Atlantic tilefish rule will expire June 5, 2016

Timeline for Development/Review/Implementation:

2014-2015 Development Track	
Action	Timeline, based on current Council meeting schedule
First FMAT Meeting, Alternative Development	August-September 2015
MAFMC Meeting (Council Approves Alternatives)	October 2015
Document Development: EA (may include additional meetings of the Committee and/or FMAT as needed)	October 2015-Dec 2015
MAFMC Meeting (Adopt public hearing draft and any preferred alternatives)	December 2015
Public Hearings and Summarization of Comments (need at least 23 days of FR notice and usually a 30-day comment period with hearings w/o EIS)	January 2016
MAFMC Meeting (Review comments; select preferred measures; approve amendment for submission to NMFS)	February 2016
Final Rule Effective	Mid 2016