



September 9, 2022

John Carmichael
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: Adding Little Tunny (False Albacore) to the SAFMC's Coastal Migratory Pelagics Fishery Management Plan

Dear Mr. Carmichael and Council Members:

The undersigned organizations, businesses, and private recreational anglers urge the South Atlantic Fishery Management Council (SAFMC) to consider re-adding false albacore (formally known as little tunny, *Euthynnus alleteratus*) to the Council's Coastal Migratory Pelagics Fishery Management Plan (CMP FMP). False albacore were previously included under this FMP but were removed in 2011.

False albacore are a tremendously important species for recreational anglers and businesses from Florida to Massachusetts, and also support commercial fisheries in the Southeast to supply bait and food markets. Despite its value to both sectors, the species has no formal management in place at the state, regional, or federal levels.

For many light-tackle and fly-fishing anglers and guides up and down the Atlantic coast, false albacore are a staple species that provide exciting inshore angling opportunities. According to the Marine Recreational Information Program (MRIP), over the past ten years Atlantic coast recreational anglers are estimated to have taken over half a million trips annually in pursuit of false albacore, catching on average nearly two million of them per year.¹ Effort is largely concentrated in various regions and ports over the course of the season (e.g., Cape Cod, MA and Cape Lookout, NC), generating a great deal of local economic activity that supports coastal communities.

The landscape of commercial fisheries for false albacore is less clear. According to NOAA Fisheries' commercial landings query tool, 2021 commercial landings of false albacore for the Atlantic coast were 435,132 pounds, which is in line with the most recent 10-year average for landings.² However, other information regarding commercial false albacore fisheries—such as what gear is used, existing markets for the species, and potential issues regarding underreporting and bycatch—is not readily available. We are not aware of substantive commercial regulations for false albacore at the state, regional, or federal levels. In addition, anecdotally, we are hearing reports of increasing false landings for the bait market that are not be reported and are thus unaccounted for.

Management History

In 2011, the SAFMC voted to remove false albacore from the CMP FMP through Addendum 18, which sought to bring FMP into compliance with new requirements stemming from the 2006 reauthorization of the Magnuson-Stevens Act (MSA). At the time, the SAFMC deemed that management and regulation of false albacore would not “serve some useful purpose” because of poor data availability, low landings, and little expectation of overfishing.³ Since then, there have been efforts to manage false albacore by the MAFMC in 2016 and SAFMC in 2019, but neither was successful.^{4,5}

The opportunity for states to manage harvest of the species does exist, and it was discussed during the Addendum 18 process.⁶ However, to our knowledge, no Atlantic coast state has developed any formal regulations for commercial or recreational false albacore fisheries. Florida does have a “Default Bag Limit for Unregulated Species” of two fish or 100lbs per person, per day (whichever is more), which applies to false albacore.¹ That being said, false albacore are a migratory species—the extent of which is not yet known—where regional or federal management would be far more appropriate and effective.

Rationale

While false albacore continue to support robust fisheries, our scientific knowledge about the species remains extremely limited. We do not know when and where they spawn, their seasonal movements or population structure, or the degree of post-release mortality in the recreational fishery. The American Saltwater Guides Association and partners are conducting an acoustic tagging study in Nantucket Sound this fall to examine movements and recreational post-release mortality,⁷ but that is the only current research effort on this species to our knowledge.

While we understand that false albacore were only included in the CMP FMP for “data collection purposes,” we believe that they meet the criteria for requiring management per the MSA—and contend that formal data collection efforts should resume. In line with National Standard Guidelines,⁸ false albacore should have an FMP because:

- The stock is an important component of the marine environment.
- The stock is targeted and caught by fisheries.
- An FMP could improve or maintain the condition and scientific understanding of the stock.
- The stock is important to recreational and commercial users and regional economies.
- Developing fisheries may emerge, and an FMP, with precautionary management strategies, should be in place to oversee it.
- There is no formal management or regulation for false albacore by federal or state entities.

¹ Florida Fish and Wildlife Conservation Commission. “Unregulated” Species. <https://myfwc.com/fishing/saltwater/recreational/unregulated/>

We contend that false albacore *do* require conservation and management and thus an FMP according to the MSA. Coastal communities and fishing businesses depend on this species being abundant so anglers can reliably encounter them. Further, while commercial landings are relatively low compared to other commercial species, we believe it is absolutely necessary that fisheries be accountable. In this case, absent any useful data about the stock and fishery, it is imperative that managers take a precautionary approach that establishes guardrails for both sectors to ensure a healthy false albacore fishery that supports diverse users.

Thank you for your consideration of our request.

Sincerely,



Tony Friedrich
Vice President and Policy Director
American Saltwater Guides Association
tony@saltwaterguidesassociation.org



Willy Goldsmith, Ph.D.
Executive Director
American Saltwater Guides Association
willy@saltwaterguidesassociation.org



Will Poston
Policy Associate
American Saltwater Guides Association
will@saltwaterguidesassociation.org

(Supporting organizations, businesses, and anglers are included on the following pages)

Supporting Businesses and Organizations



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Nautilus Reels



Van Staal



The Saltwater Edge



Florida Fishing Products



Simms Fishing Products



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AFFTA



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Sage, Reddington, Rio, Fly Water



IGFA



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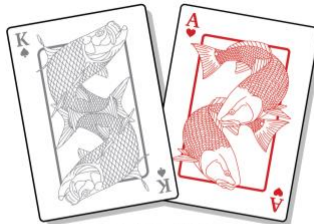


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Mark Pierce, South Carolina
Edward Pierrepont, New York
Forrest Powell, South Carolina
Alejandro Feliciano, Florida
Christine Bogdanowicz, New York
David Huntley, Rhode Island
Matt Winkler, Colorado
Patrick Fowler, Connecticut
Diana Harris, North Carolina
Charlotte Bloom, Maine
Alexander Gust, Connecticut
Randy Schmidt, Connecticut
Brian Weiss, Connecticut
Julien Tremblay, Rhode Island
La McDonald, North Carolina
Evan Keller, Delaware
DeVan Barbour, North Carolina
Jason Helterbridle, Ohio
Cliff Richer, Rhode Island
Len Cappe, South Carolina

Paul Panus, Rhode Island
Tristan Thompson, North Carolina
David Cloutier, Maine
John Cooper, Maine
Andrew Briggs, Maine
Joseph Harris, North Carolina
Daniel Medlin, North Carolina
Danny Medlin, North Carolina
Michael Hacker, New Jersey
Jeffrey Horstman, Maryland
Zac Tillman, Pennsylvania
Chris Thompson, North Carolina
Peyton Price, Pennsylvania
Jim Tryforos, New Jersey
William Burke, Massachusetts
Thomas Wetherington, Tennessee
Jim Simms, Pennsylvania
William Lytle, Massachusetts
Calder Reynolds, Massachusetts
Joseph Markey, Rhode Island
Travis Huebner, New York
Jon Tregaea, New Hampshire
Paul Myers, North Carolina
Peter minnick, New York
Michael Sullivan, Massachusetts
Bruce Greco, New York
Derek Cummings, New Hampshire
Matt Koenig, Massachusetts
Brian Walsh, New Jersey
Peter Auster, Connecticut
Joseph Dart, Massachusetts
Richard Fleming, New Hampshire
Donna Hanlon, New Jersey
Arthur Romaine, New York
Jared Woods, Maine
Ben Maguire, Massachusetts
Mike Andresino, Massachusetts
Mark Farrell-Churchill, Nebraska
Kevin Johnston, Massachusetts
Kenneth Spicer, Rhode Island
Michael Lombardozi, Connecticut
Tyler Doherty, Massachusetts
Linda Barrett, Florida
Barry Woods, Maine
Nicholas Cardi, New York
Kieran Alessi, New Jersey

Bob Olsen, Vermont
Steven Thomas, Connecticut
Ron Meza, New York
Thomas McLoughlin, Connecticut
Joseph Neves, New York
Stephen Madden, Massachusetts
Eric Bosley, New York
Ian Warhaftig, Connecticut
Kurt Karwacky, Maine
Matt Bauer, Rhode Island
John Kollett, Massachusetts
Fred Formicola, New Jersey
Adam Cooperstock, New York
Tedd Van Buskirk, New Jersey
Chris Thompson, Massachusetts
ernest mellon, New Jersey
Robert Shane, Virginia
Mike McDonald, Massachusetts
Jarrett Miller, Oklahoma
John Bartolo, New Hampshire
Frederick Thurber, Massachusetts
Tom Mattusch, California
Darryl Forrester, Rhode Island
Norm Staunton, Vermont
Morga Eddy, Virginia
Peter Przygocki, Massachusetts
Robert Krist, Connecticut
Captain Bob Salerno, Connecticut
Robert Carkhuff, Massachusetts
Fred Floyd, Massachusetts
Dan Searle, Tennessee
Matthew Borovy, New York
Drew Contessa, Connecticut
Timothy Kinkead, Virginia
Joseph Gagliardo, New York
Eric Spicer, Rhode Island
Joseph McNamara, Massachusetts
Michael Hess, Massachusetts
Benjamin Masse, Rhode Island
Peder Hagberg, New Jersey
Jason Currier, Maine
Robert Pellegrino, Massachusetts
David Surdel, Massachusetts
John Costello, Rhode Island
Chris Parcels, Connecticut
Dean Machado, Maine

Bob Groskin, New Jersey
Joshua Freiburger, New York
Robert Verity, New York
David Prockop, Rhode Island
Jeff Verrill, Maine
Brian Sittlow, Rhode Island
Bill Fiora, Massachusetts
Stephen Truscott, Georgia
Geoff Aleva, Maine
Feini Yin, Pennsylvania
Reynolds Cowles, Virginia
John Yavorsky, New Jersey
Lars Munson, South Carolina
Butch Brodie, Virginia
Max Eagan, Massachusetts
John Arlotta, New York
Anthony Mize, New Hampshire
Logan Williams, Connecticut
Brad Greenwood, Maine
Ben Scott, Massachusetts
Jason Taylor, Pennsylvania
Will Anders, North Carolina
craig Uecker, Maine
Timothy Reichheld, Massachusetts
Peyton Hale, North Carolina
Timothy Costello, Massachusetts
Brian Potvin, Massachusetts
Thomas Fuda, Connecticut
David Dehart, Oregon
Peter Romano, Connecticut
Bjarne Cox, Armed Forces Europe
Jay Cronin, Massachusetts
Cody pallas, Rhode Island
Mark Budreski, Massachusetts
William McGreevy, Florida
Andrew DeCarton, Rhode Island
Rosemary Burkhalter-Castro, Florida
Flynn Willsea, Maine
Jay Harrison, Massachusetts
James Kilmartin, Rhode Island
John Kilmartin, Rhode Island
Erin Kilmartin, Massachusetts
Robert Lepczyk, Maryland
John Tighe, Massachusetts
Jeff Rybak, South Carolina
Adam Sweet, Massachusetts

Jake Nicholson, Massachusetts
Tim Drummey, Massachusetts
Josh Bergan, Montana
Scott Jorgensen, New York
Georgia Skuza, Pennsylvania
Craig Cantelmo, New York
Daniel Buckley, Massachusetts
Andrew Kelly, Connecticut
Louis Schlaker, Rhode Island
Francis Lorello, Maine
Robert Clancy, Massachusetts
Victor Plourde, Maine
Eric Fekete, Connecticut
Robert Verge, Maine
Tom McKelvey, New York
Scott Bollman, New York
Kevin Ventriglia, New Jersey
Jim Bernstein, Maine
Rich Blott, Illinois
Douglass Bomeisler, Florida
Wyce Nasiri, Massachusetts
Christopher Miller, Virginia
Stephen Schwartz, Florida
Parker Gerrish, Maine
Stephen Arnett, Idaho
Rob Moriarty, New York
Chris Foster, New York
Michael Carroll, Massachusetts
Andy Bayne, Florida
Peter Olsen, Massachusetts
Jeffrey Sayre, Massachusetts
Christian Sluder, Maryland
Mike Querfeld, Connecticut
Gordon Hill, Florida
Logan Torino, Florida
Michael Berger, Massachusetts
Tegan Gale, Massachusetts
Tristan Houtz, Massachusetts
Sean Walsh, Massachusetts
William montgomery, California
John Rogers, Massachusetts
Kyle Lyons, Rhode Island
Colby Fitzgibbons, Massachusetts
Tyler Rudy, Massachusetts
James Marsiello, New York
Joseph Daigneault, Rhode Island

Glen Radovich, New York
Jason Skruck, Connecticut
Ken Freedman, Massachusetts
Edward Pitta, Connecticut
Austin Schofield, Massachusetts
Thad Bingel, Virginia
Thomas Fernandez, New York
Amber Fraga, New Hampshire
Pete Barrett, Florida
David Bullard, Florida
Mat Howell, Colorado
Amy Dahm, Maryland
Lisa Doricchi, Maryland
Dino Torino, Florida
Paul Marzolla, New Jersey
Jake Weinstein, New York
Ted Matera, New Jersey
Kerry Heffernan, New York
Susan Bertoline, New York
Chase Freiman, Rhode Island
Alex Shukis, Massachusetts
Christopher Fay, Massachusetts
Gary Morrissette, Massachusetts
Owen Roberge, Florida
Jack Condon, Massachusetts
Sean P Keen, Massachusetts
Kevin Kiley, Massachusetts
Sean Hughes, Connecticut
Tanner OKeefe, Massachusetts
Ben Faria, Connecticut
Ryan Kumicz, New York
Colin Cournoyer, Massachusetts

Fishing Guides & Charter Captains

Brian Shumaker, Pennsylvania
Capt. Brian Moran, New York
Gary Dubiel, North Carolina
Dan Comte, North Carolina
Brice Contessa, Massachusetts
Andrew Bates, North Carolina
Jason Howell, Rhode Island
Ron Signs, Massachusetts
Capt. Frank Crescitelli, New York
Zachary Whitener, Maine
Capt. Paul Eidman, New Jersey
Seth Vernon, North Carolina
Paul Capuzzo, New York
Lynne Heyer, Massachusetts
Jeffrey Heyer, Massachusetts
Michael Oppegaard, North Carolina
Alan Thomas, New Jersey
Capt. Jot Owens IV, North Carolina
Neal Vitullo, Massachusetts
Capt. Anthony Grassi, New Jersey
Michael Platt, Connecticut
Dave Best, Louisiana
Allen Cain, North Carolina
David Flanagan, New York
Joshua Benton, North Carolina
Perry McDougald, North Carolina
Capt. Dean Lamont, North Carolina
Bobby Brewer, North Carolina
Ira Laks, Florida
Cameron Pappas, North Carolina
William Jones, North Carolina
John Mauser, North Carolina
Jonathan Hulcher, North Carolina
Capt. J Moore, New Jersey
Steve Roff, South Carolina
Captain George Sylvestre, Massachusetts
Merritt White, New York
David Blinken, New York
Chris Newsome, Virginia
Diogo Godoi, Massachusetts
Ben Whalley, Maine

Patrick Cassidy, Massachusetts
Capt. Henry Tomlinson, South Carolina
Colt Harrison, South Carolina
Thomas Chapman, South Carolina
Newman Weaver, South Carolina
Corey Gammill, Massachusetts
Capt. Brian Williams, New Jersey
Butch Constable, Florida
Frank Breakell, New Jersey
James Miller, New York
Paul McCain, New York
Brian Patterson, Rhode Island
James Goodhart, Massachusetts
Timothy Begin, Massachusetts
Dan Wolotsky, Maine
Jason Dapra, New Jersey
Capt. Matthew Kelleher, Massachusetts
Chuck Aikens, North Carolina
Chris Britton, Florida
Vincent Catalano, New York
Caleb Blackburn, Florida
Justin Cooper, Maine
Brandon Cyr, Florida
Joe Evans, Maryland
Lou Tirado, Maine
Paul Dixon, New York
Carle Hildreth, Maine
Brian Kelly, Massachusetts
Terry Nugent, Massachusetts
Abbie Schuster, Massachusetts
Joseph Mustari, New Jersey
Kyle Schaefer, Maine
Thomas Kosinski, New Jersey
Capt. Cody Rubner, Florida
Captain John McMurray, New York
Captain Mike Holliday, Florida
Captain Jaimie Boyle, Massachusetts
Captain Paul Dixon, New York
Captain Peter Fallon, Maine
Capt. Zach Horrocks, New York
Pete Henderson, Connecticut

CC: Andy Strelcheck, Regional Administrator, Southeast Regional Office, NOAA Fisheries; Russell Dunn, National Policy Advisor for Recreational Fisheries, NOAA Fisheries; Christopher Moore, Executive Director, Mid-Atlantic Fishery Management Council;

¹ Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division August 19, 2022.

² Personal communications from the National Marine Fisheries Service, Commercial Fisheries. Landings. August 20, 2022.

³ South Atlantic Fisheries Management Council. Final Amendment 18 to the Fishery Management Plan for Coastal Migratory Pelagic Resources. September 2011. <https://safmc.net/documents/2022/04/cmp-amendment-18.pdf/>

⁴ Mid-Atlantic Fishery Management Council. Unmanaged Forage Omnibus Amendment. September 2017. <https://www.mafmc.org/actions/unmanaged-forage>

⁵ South Atlantic Fishery Management Council. Mackerel Cobia Meeting. December 2019.

⁶ South Atlantic Fishery Management Council. Amendment 18.

⁷ American Saltwater Guides Association. New Research Partnership to focus on Beloved-But-Understudied False Albacore. June 2022. <https://saltwaterguidesassociation.com/new-research-partnership-to-focus-on-beloved-but-understudied-false-albacore/>

⁸ National Standard Guidelines, Magnuson-Stevens Act. 50 CFR Part 600 Subpart D. <https://www.ecfr.gov/current/title-50/chapter-VI/part-600/subpart-D>