

Dustin C. Leaning

From: Robert Beal
Sent: Sunday, February 6, 2022 5:38 PM
To: Dustin C. Leaning
Subject: FW: [External] 2022 Black Seabass & Scup

From: ANTHONY J NOTARO <anthonynotaro@sbcglobal.net>
Sent: Saturday, February 5, 2022 5:53 PM
To: Michael Pentony <michael.pentony@noaa.gov>; Robert Beal <Rbeal@asmfc.org>
Subject: [External] 2022 Black Seabass & Scup

Dear Mr. Pentony,

I am the owner of a party boat and a private charter boat and I am deeply concerned with the overregulating of the Scup and Black Seabass harvest. When a species is overfished, and overfishing is occurring it is easier to understand the cuts. This is not the case in 2022 with plentiful Scup and Black Seabass stocks. My understanding is that if a 60% reduction in Scup harvest isn't met NOAA would terminate the ability to catch Scup in Federal waters. Many charter boats rely on fishing in Federal waters for Scup and return back to CT. With strong stock it has been pointed out that closing Federal waters for Scup only relates to a 5% savings in harvest. This will cause a series hardship on many charter boats, their crew and family.

The Black Seabass data shows the stock is two times greater than the spawning stock biomass required. This is after four years of regulations, a drastic decline in fishing license purchases, but still the harvest data is much higher and on the rise. I believe the data produced by Mrip is not accurate (false) and should not be used. I feel if greater restrictions are applied I will go out of business along with other charter boats. Therefore I feel it is extremely important to wait for the active stock assessment results this year before making any drastic cuts and to keep the status quo regulations.

Harvest Control Rule could be an option where stocks can be managed by stock assessments and consistent regulations instead of false information from Mrip. I understand that a lot of work needs to be done in a very short period of time, but I truly believe the benefits will save the 2022 fishing season, and avoid serious financial impact on charter boats, party boats and economic impact on local shoreline businesses.

The two year moratorium on Mako shark will also have a serious financial impact on my off shore business, with all of the changes I am greatly concerned about staying in business, this effects my business, my family, my crew and my loyal customers who I have built my business around. My customers also support the local shoreline businesses, when they stop to eat or shop after fishing. I ask that you really consider the cuts to Scup and Black Seabass before making any changes.

Sincerely,

Captain Tony Notaro
Lucky Hook Charters LLC
860-581-3474

Sent from [Mail](#) for Windows

Dustin C. Leaning

From: Robert Beal
Sent: Sunday, February 6, 2022 5:37 PM
To: Dustin C. Leaning
Subject: FW: [External] Scup and Seabass concerns from CT.

From: CT Charter and Party Boat Association <ctcharterpartyassoc@gmail.com>
Sent: Sunday, February 6, 2022 10:46 AM
To: Robert Beal <rbeal@asmfc.org>; Michael Pentony <michael.pentony@noaa.gov>
Subject: [External] Scup and Seabass concerns from CT.

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

Date: Fri, Feb 4, 2022, 10:37 AM

Michael Pentony
Regional Administrator
Noaa Fisheries
Michael.pentony@noaa.gov

RE: 2022 Scup & Black Seabass

Dear Mr. Pentony

The Connecticut Charter and Partyboat Association is writing to you with deep concerns regarding overregulating our Scup and Black Seabass harvest. When a species is overfished, and overfishing is occurring it is easier to digest cuts. But that's simply not the case in 2022 with robust Scup and Seabass stocks. We represent boats that sail from many CT ports. Our Eastern CT boats rely on accessing Scup and Seabass in federal water then return back into CT. Our understanding is if a 60% reduction in Scup harvest isn't met, NOAA would terminate our boats from catching Scup in federal waters and close it the entire year. Again, with strong stocks, it has been pointed out that closing federal waters for scup only corresponds to a 5% savings in harvest. This inflicts an unnecessary hardship shared by our Captain's small businesses, their crews and customers seeking access to the fish they have enjoyed for generations and to which their businesses have been built around. There will also be a substantial negative economic impact felt by all the shoreline businesses supporting our fleet of boats; i.e. marine fuel, deli's, tackle shops and restaurants that rely on our businesses as part of the seasonal local economy.

The Black Seabass assessment shows the stock to be two times greater than the spawning stock biomass required. After 4 years of consistent regulations and fishing license sales are down, yet harvest data is grossly higher and on the rise. This is another indication data produced by Mrip is false and shouldn't be used. Our fisheries managers recognized Mrips unobtainable data and applied smoothing of the outliers and this process produced a small savings. If greater restrictions are applied, many of our charter and party boats will go out of business over this. Therefore, it's imperative to wait for the active stock assessment results this year before making drastic harvest cuts and to keep with status quo regulations.

Another option is to fast track the "Harvest Control Rule," where our stocks can be managed by consistent regulations and stock assessments instead of cooked up Mrip math problems. We understand a lot of work needs to be performed in a very short period of time, but the benefits can quickly save our 2022 season, and avoid economic impacts.

New Mrip produced a wave of problems for the recreational sector. Mrip's recreational effort is so high the fish added (from the re-calibration) the recreational harvest limit virtually evaporated. At this exact same time the commercial sector saw a liberated quota and gained them a large profitable addition. As of now the Commercial sector in CT will increase their harvest from very restrictive limits in 2019 to a 120 fish per trip **increase** in 2022. As stated above, the greatest metric showing Mrip's recreational effort is wrong. **Annual fishing license sales are down.** How can we allow random postcards to speak louder than numbers of purchased fishing licenses?

This winter both for-hire and recreational anglers suffered: a greater than 50% reduction in Cod fish, a two-year moratorium on Mako shark and now possible reductions on perfectly healthy stocks of Scup and Seabass. Collectively these cuts will lead to many for-hire boats going out of business and those that do not, will only be able to target Striped Bass, putting unnecessary pressure on that species. Please consider all possibilities to preclude and correct these restrictions on our healthy stocks.

Sincerely the Officers of the CCPBA

Capt. Marc Berger

Capt. Seth Megarle

Capt. TJ Karbowski

Capt. Michael Pirri

The Connecticut Charter and Party Boat Association is composed of 40 professional charter boats sailing from ten different Connecticut ports, covering the Western, Central and Eastern Long Island Sound. Our Professional Captains have verified credentials, are held to the highest ethics standards and are out on the water everyday often acting as the Sheppard's of their areas.

Dustin C. Leaning

From: Robert Beal
Sent: Friday, February 4, 2022 3:35 PM
To: Dustin C. Leaning
Subject: FW: [External] Scup and Black Sea Bass Reductions

From: Frank Blume <fblume@att.net>
Sent: Friday, February 4, 2022 11:15 AM
To: Robert Beal <Rbeal@asmfc.org>
Subject: [External] Scup and Black Sea Bass Reductions

Bob

The recreational sector does not warrant any catch reductions.
If any are needed, the commercial sector should bear the brunt of any necessary reductions.

The commercial sector contributes heavily to our politicians when running for office. Is that not a form of bribery?

Captain Frank Blume

Dustin C. Leaning

From: Robert Beal
Sent: Friday, February 4, 2022 3:36 PM
To: Dustin C. Leaning
Subject: FW: [External] Scup & Seabass

From: BlackHawk Fishing <blackhawkfishing@gmail.com>
Sent: Friday, February 4, 2022 2:43 PM
To: Michael Pentony <michael.pentony@noaa.gov>; Robert Beal <Rbeal@asmfc.org>
Subject: [External] Scup & Seabass

Dear Michael & Bob,

I was simply appalled upon hearing the news of a proposed 28% reduction in black sea bass and a possible proposed closure in federal waters for scup for the upcoming 2022 season.

Decisions like these make me feel like NOAA and ASMFC are completely and totally out of touch with the public and what is actually happening out on the water, where my family and I make our living every day. I need you to understand how your thinking and your flawed proposed regulations negatively affect the common working class who have to live with your decisions.

I've been in the fishing industry now for over 50 years. I'm 71 years old, I've seen good times and bad. My daughter, son and son in law work on the boat and business and support their young families from the boat. The proposed regulations would financially cripple all of us, the entire local for-hire fishing industry would go under. Enough is enough.

When the state of Connecticut increased the party/charter bonus season scup bag limit to 50 fish a couple years ago, I was against that high number. I publicly stated that we didn't need that many to satisfy our clients, and moreover, don't give it to us now only to cut back to some ridiculous number down the road. It now unfortunately looks like my worst fears have come to pass. How does it make sense to decrease the scup size limit and increase the party/charter bonus season bag limit, only to turn around and reverse course and increase the size limit and close federal waters a few years later? Decisions like these make the fishing industry lose faith in the fishery management process.

You've given us crumbs on all the other species we fish for, striped bass, bluefish, fluke, seabass, cod, it's all been reduced to practically nothing. Scup is the only species left, that our customers could, at the very least, have the opportunity to, and more importantly the mental perception, that they could go home with a nice bag of fillets to feed their families. Most of them don't even come near the limit of 50, but at least they know they

have the opportunity to do so. It's that perception that's so important to them and us.

I also need you to understand how important the federal water scup fishery is to my business and other CT for-hire boats. Our boat fishes in federal waters throughout the year for scup and black sea bass. It's where the best and most reliable fishing is, and that's why customers travel from long distances to patronize our family's business. A federal waters scup closure would be crippling.

I was recently told that New York has opened up scup to the commercial draggers at 50,000 pounds a day. Where's the justification in that when you're considering cutting back the recreational sector at the same time? This is simply ridiculous. You're going to have a battle on your hands, our industry has been pushed around enough, we're not going to take it anymore.

Lastly, we have been pleading with you for years to get us the hell out of the recreational sector. We're as commercial an operation as any dragger, longliner or gillnetter and should be entitled to be included in our own category. Being lumped in the recreational sector is unjust and creates problems.

I feel like it's also lost on NOAA and ASMFC the ripple impact our fishing businesses have on our communities. Our business has such a positive financial impact on so many local businesses, it's simply phenomenal!! Our customers stay at the local hotels, they fuel up at our gas stations, they eat at our restaurants, and have breakfast at our very early morning mom and pop diners.

Like so many government agencies in the past, and like Washington DC today, your poor decision-making is making people lose faith. People's lives and careers are at stake here, please think long and hard before you implement foolish regulations that will accomplish nothing but hurting the fishing industry.

Respectfully,

Capt. Greg Dubrule

Owner, Black Hawk

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Black Hawk II

Niantic, CT

860-448-3662

<http://www.BlackHawkSportFishing.com>

Dustin C. Leaning

From: Robert Beal
Sent: Friday, February 4, 2022 3:36 PM
To: Dustin C. Leaning
Subject: FW: [External] Black Sea Bass & Scup - 2022 Regulations

From: Jack Bucchi <jackbucchi@comcast.net>
Sent: Friday, February 4, 2022 2:31 PM
To: Michael Pentony <michael.pentony@noaa.gov>
Cc: Robert Beal <Rbeal@asmfc.org>
Subject: [External] Black Sea Bass & Scup - 2022 Regulations

Dear Mr. Pentony

As a member of the Connecticut Charter and Partyboat Association I'm writing to you with deep concerns regarding the overregulation of our Scup and Black Seabass harvest. When a species is overfished, and overfishing is occurring it is easier to digest cuts. But that's simply not the case in 2022 with robust Scup and Seabass stocks. We represent boats that sail from many CT ports. Our Eastern CT boats rely on accessing Scup and Seabass in federal water then return back into CT. Our understanding is that if a 60% reduction in Scup harvest isn't met, NOAA would stop our boats from catching Scup in federal waters and close it the entire year. Again, with strong stocks, it has been pointed out that closing federal waters for scup only corresponds to a 5% savings in harvest. This inflicts an unnecessary hardship shared by our Captain's small businesses, their crews and customers seeking access to the fish they have enjoyed for generations and to which their businesses have been built around. There will also be a substantial negative economic impact felt by all the shoreline businesses supporting our fleet of boats; i.e. marine fuel, deli's, tackle shops and restaurants that rely on our businesses as part of the seasonal local economy.

The Black Seabass assessment shows the stock to be two times greater than the spawning stock biomass required. After 4 years of consistent regulations, fishing license sales are down, yet harvest data is grossly higher and on the rise. This is another indication that data produced by Mrip is erroneous and shouldn't be used. Our fisheries managers recognized Mrip's unobtainable data and applied smoothing of the outliers. This process produced a small savings. If greater restrictions are applied, many of our charter and party boats will go out of business. Therefore, it's imperative to wait for the active stock assessment results this year before making drastic harvest cuts and to stay with status quo regulations.

Another option is to fast track the “Harvest Control Rule,” where our stocks can be managed by consistent regulations and stock assessments. We understand a lot of work needs to be performed in a very short period of time, but the benefits can quickly save our 2022 season, and avoid the economic impacts.

New Mrip produced a wave of problems for the recreational sector. Mrip’s recreational effort is so high the fish added (from the re-calibration) to the recreational harvest limit virtually evaporated. At the same time the commercial sector received an increased quota which gave them a large profitable addition. Now the Commercial sector in CT will increase their harvest from very restrictive limits in 2019 to a 120 fish per trip **increase** in 2022. As stated above, the greatest metric showing Mrip’s recreational effort is wrong. **Annual fishing license sales are down.** How can we allow random post cards to speak louder than the number of purchased fishing licenses?

This winter both the for-hire and recreational anglers suffered: a greater than 50% reduction in Cod fish, a two-year moratorium on Mako shark and now possible reductions on perfectly healthy stocks of Scup and Seabass. Collectively these cuts will lead to many for-hire boats going out of business and those that do not, will only be able to target Striped Bass, putting unnecessary pressure on that species. Please consider all possibilities to preclude and correct these restrictions on our healthy stocks.

Best Regards,

Captain Jack Bucchi
Priority One Charters
Clinton, CT
860-916-4586

Dustin C. Leaning

From: Robert Beal
Sent: Sunday, February 6, 2022 5:35 PM
To: Dustin C. Leaning
Subject: FW: [External] 2022 Scup & Black Seabass

From: Jesse Martello <thinkbigcharters@cox.net>
Sent: Sunday, February 6, 2022 2:18 PM
To: Robert Beal <Rbeal@asmfc.org>; Michael Pentony <michael.pentony@noaa.gov>
Subject: [External] 2022 Scup & Black Seabass

Michael Pentony
Michael.pentony@noaa.gov
Bob Beal
rbeal@asmfc.org

Michael Pentony
Regional Administrator
Noaa Fisheries
Michael.pentony@noaa.gov

RE: 2022 Scup & Black Seabass

Dear Mr. Pentony

The Connecticut Charter and Partyboat Association is writing to you with deep concerns regarding overregulating our Scup and Black Seabass harvest. When a species is overfished, and overfishing is occurring it is easier to digest cuts. But that's simply not the case in 2022 with robust Scup and Seabass stocks. We represent boats that sail from many CT ports. Our Eastern CT boats rely on accessing Scup and Seabass in federal water then return back into CT. Our understanding is if a 60% reduction in Scup harvest isn't met, NOAA would terminate our boats from catching Scup in federal waters and close it the entire year. Again, with strong stocks, it has been pointed out that closing federal waters for scup only corresponds to a 5% savings in harvest. This inflicts an unnecessary hardship shared by our Captain's small businesses, their crews and customers seeking access to the fish they have enjoyed for generations and to

which their businesses have been built around. There will also be a substantial negative economic impact felt by all the shoreline businesses supporting our fleet of boats; i.e. marine fuel, deli's, tackle shops and restaurants that rely on our businesses as part of the seasonal local economy.

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Another option is to fast track the "Harvest Control Rule," where our stocks can be managed by consistent regulations and stock assessments instead of cooked up Mrip math problems. We understand a lot of work needs to be performed in a very short period of time, but the benefits can quickly save our 2022 season, and avoid economic impacts.

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This winter both for-hire and recreational anglers suffered: a greater than 50% reduction in Cod fish, a two-year moratorium on Mako shark and now possible reductions on perfectly healthy stocks of Scup and Seabass. Collectively these cuts will lead to many for-hire boats going out of business and those that do not, will only be able to target Striped Bass, putting unnecessary pressure on that species. Please consider all possibilities to preclude and correct these restrictions on our healthy stocks.

Thank you
Captain Jesse Martello
CT Charter Boat Member

Sent from my iPhone

Dustin C. Leaning

From: Robert Beal
Sent: Friday, February 4, 2022 3:35 PM
To: Dustin C. Leaning
Subject: FW: [External] Scup & Black Sea Bass

From: Kevin Bentley <reelinboat@sbcglobal.net>
Sent: Friday, February 4, 2022 11:13 AM
To: Michael Pentony <michael.pentony@noaa.gov>; Robert Beal <Rbeal@asmfc.org>
Subject: [External] Scup & Black Sea Bass

Dear Mr. Pentony and Mr. Beal

As the owner and operator of Reelin Sportfishing Charters sailing from New London, Connecticut I am writing to you with deep concerns regarding overregulating our Scup and Black Seabass harvest. When a species is overfished, and overfishing is occurring it is easier to digest cuts. But that's simply not the case in 2022 with robust Scup and Seabass stocks. We fish out of Eastern Connecticut to accessing Scup and Seabass in federal water then return back into CT. My understanding is if a 60% reduction in Scup harvest isn't met, NOAA would terminate catching Scup in federal waters and close it for the entire year. Again, with strong stocks, it has been pointed out that closing federal waters for scup only corresponds to a 5% savings in harvest. This inflicts an unnecessary hardship for our small business, crew and customers seeking access to the fish they have enjoyed for generations and to which our business has been built around. There will also be a substantial negative economic impact felt by all the shoreline businesses supporting the for-hire fleet; i.e. marine fuel, deli's, tackle shops and restaurants that rely on our businesses as part of the seasonal local economy.

The Black Seabass assessment shows the stock to be two times greater than the spawning stock biomass required. After 4 years of consistent regulations and fishing license sales are down, yet harvest data is grossly higher and on the rise. This is another indication data produced by Mrip is false and shouldn't be used. Our fisheries managers recognized Mrips unobtainable data and applied smoothing of the outliers and this process produced a small savings. If greater restrictions are applied, many of our charter and party boats will go out of business over this. Therefore, it's imperative to wait for the active stock assessment results this year before making drastic harvest cuts and to keep with status quo regulations.

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New Mrip produced a wave of problems for the recreational sector. Mrip's recreational effort is so high the fish added (from the re-calibration) the recreational harvest limit virtually evaporated. At this exact same time the commercial sector saw liberated quota and gained them a large profitable addition. As of now

the Commercial sector in CT will increase their harvest from very restrictive limits in 2019 to a 120 fish per trip **increase** in 2022. As stated above, the greatest metric showing Mrip's recreational effort is wrong. **Annual fishing license sales are down.** How can we allow random post cards to speak louder than numbers of purchased fishing licenses?

This winter both for-hire and recreational anglers suffered: a greater than 50% reduction in Cod fish, a two-year moratorium on Mako shark and now possible reductions on perfectly healthy stocks of Scup and Seabass. Collectively these cuts will lead to many for-hire boats going out of business and those that do not, will only be able to target Striped Bass, putting unnecessary pressure on that species. Please consider all possibilities to preclude and correct these restrictions on our healthy stocks.

Regards,
Captain Kevin Bentley
Reelin Sportfishing Charters, LLC
921 Trumbull Highway
Lebanon, Ct 06249

Dustin C. Leaning

From: Robert Beal
Sent: Sunday, February 6, 2022 5:40 PM
To: Dustin C. Leaning
Subject: FW: [External] Fwd: Sea Bass & Scup Moritorium on Regulation Letter

From: myden52585@aol.com <myden52585@aol.com>
Sent: Saturday, February 5, 2022 3:18 PM
To: Robert Beal <Rbeal@asmfc.org>
Subject: [External] Fwd: Sea Bass & Scup Moritorium on Regulation Letter

Mr. Beal

My name is Marc Berger and I have operated Lucky Strike Charters, a full-time charter boat based out of Niantic, CT, since 2,001. I have also been involved in the charter industry in CT since 1985. I am writing to you today with extreme concern about the overregulation of our scup and sea bass stock. I have witnessed Sea Bass restrictions go from a 25 fish limit @12" to a 5 fish limit @ 15" while out on the water, I have seen the stock grow dramatically. We were forced to take an increase in bag limit of small scup, only to be cut while this stock also increased. Cod, sharks, stripers, and others have been made so restrictive that we are all on the verge of closing our small, privately owned businesses. This would have a deleterious impact on tourism and hurt other local small businesses who support our industry.

The MRIP data is inaccurate and relies on flawed assumptions and statistical modeling. We are on the water every day and the fisheries have been growing every year. If you wish to continue to promote local, family-owned, small businesses and the tourism the communities rely on, it is imperative to maintain the status quo, at minimum, until a stock assessment is made later this year.

Marc Berger
Captain, Lucky Strike

President of the CT Charter & Party Boat Association

Dustin C. Leaning

From: Robert Beal
Sent: Friday, February 4, 2022 3:36 PM
To: Dustin C. Leaning
Subject: FW: [External] please save our Scup and Seabass

From: Capt. Mike <Capt.Mike@flyingconnie.com>
Sent: Friday, February 4, 2022 3:06 PM
To: Michael Pentony <michael.pentony@noaa.gov>
Cc: Robert Beal <rbeal@asmfc.org>; Justin Davis <justin.davis@ct.gov>
Subject: [External] please save our Scup and Seabass

Dear Mr. Pentony

I am very passionate about fish, and being able to earn a living showing people a fishing experience on the water. If near future Policy is enacted, regulatory cuts are applied to healthy Scup and Seabass stocks, I will be forced to end my business. The direct impact (besides myself): my wife handles bookings and accounting losses her job, and my two mates lose their jobs. My loyal customers lose access to their fish. We are at the barebones for regulations, striped bass - down to a difficult slot to fill from 2@28, Cod cut 50%, Mako 2 year moratorium applied, bluefish regulated down greater than 50%, fluke dont setup in my area they only pass through quickly. This leaves Seabass and some scup for customers to enjoy catching. Any increase in size or reduction in creel or days removed from season; there is no reason left for customers to come.

I am very educated in this process, I have listened to all the meetings, I have commented in the roll of AP; there are several ways out of this mess, MRIP created, please choose one. It would be shameful for NOAA to end so many livelihoods over well stocked fisheries.

Captain Mike Pirri

President

FlyingConnie Charters LLC.

Cell: [203-515-1444](tel:203-515-1444)

Web: www.FlyingConnie.com

Dustin C. Leaning

From: Robert Beal
Sent: Friday, February 4, 2022 3:36 PM
To: Dustin C. Leaning
Subject: FW: [External] 2022 Scup and Sea Bass

From: Nightjack Sportfishing <nightjacksportfishing@gmail.com>
Sent: Friday, February 4, 2022 12:17 PM
To: Michael Pentony <michael.pentony@noaa.gov>
Cc: Robert Beal <rbeal@asmfc.org>
Subject: [External] 2022 Scup and Sea Bass

Michael Pentony
Regional Administrator
Noaa Fisheries
Michael.pentony@noaa.gov

2022 Scup & Black Seabass

Dear Mr. Pentony

As an individual charter fisherman and an association member of the CT Charter Party Boat Association, I ask that you hear our concerns. Scup and sea bass are jumping into the boat! The biomass of sea bass is moving north and has made CT waters their home. In fact, they are eating us out of house and home. These fish are highly aggressive and out-competing other species. It is very common to catch a sea bass on a piece of squid and notice a mouth full (in addition to a full belly) of food, such as crab or even baby lobsters. Scup are caught on every single rock pile or piece of structure around. The thought of reducing their harvest for recreational/ charter fisheries is wrong.

When changes were made to the striped bass stocks, I recognized that something did need to be done based on my experience, and I agreed with limiting the harvest and introducing slot limits. Same goes for tautog, where we are seeing increased pressure on a slow growing fish. Rational changes when our experience agrees with data will not be objected to by our association, we instead will change business models and methods in order to survive. That's simply not the case in 2022 with robust Scup and Seabass stocks! We know this through experience, something is wrong with data collection that comes to conclusions that a reduction is necessary in these fisheries.

If this reduction is allowed to happen, we experience an unnecessary hardship. We are small businesses, which are run based on a love and passion for fishing; the environment and sharing our experiences on the water with others. Believe me, none of us are getting rich, but we are supporting another dying industry, and many local economies such as marine fuel, deli's, tackle shops, marinas and restaurants. Through our businesses, we support other businesses on company outings, we introduce young fisherpersons to the sport, we support charitable events such as "Take a Vet Fishing" and we also touch persons with disabilities, youths in group homes, persons suffering from mental illness with days away from routine and trips out onto the water. A lot can be lost on bad data and poor decision making. Our CT businesses are surviving on Sea Bass and Scup!

The Black Seabass assessment shows the stock to be two times greater than the spawning stock biomass required. After 4 years of consistent regulations and fishing license sales are down, yet harvest data is grossly higher and on the rise. This is another indication data produced by Mrip is false and shouldn't be used. Our fisheries managers recognized Mrips unobtainable data and applied smoothing of the outliers and this process produced a small savings. If greater restrictions are applied, many of our charter and party boats will go out of business over this. Therefore, it's imperative to wait for the active stock assessment results this year before making drastic harvest cuts and to keep with status quo regulations.

This is occurring as we see the commercial side get a substantial increase in harvest! Makes no sense, if we are truly worried about the stock. Speaking from daily experience on the water we are worried about under harvesting these species!

Thank You for your consideration on this matter,

John from Nightjack Sportfishing (The only fishing charter boat sailing from Branford, CT)

Dustin C. Leaning

From: Robert Beal
Sent: Sunday, February 6, 2022 5:42 PM
To: Dustin C. Leaning
Subject: FW: [External] Scup and black sea bass regulations

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

From: Rick Roy <marlintinitsf@aol.com>
Sent: Saturday, February 5, 2022 9:02 AM
To: Michael Pentony <michael.pentony@noaa.gov>
Cc: Robert Beal <Rbeal@asmfc.org>
Subject: [External] Scup and black sea bass regulations

Dear Mr. Pentony,

I am writing you with deep concerns regarding overregulating our scup and black sea bass harvest. I run a six pack charter boat out of New London, Ct. It has taken many years to build my business to where it is now. With tighter restrictions on striped bass, bluefish, fluke, codfish and mako sharks, I am losing customers. If overregulating scup and black sea bass occurs, it could put my business in jeopardy of going out of business.

The black sea bass assessment shows that the stock is two times greater than the spawning stock biomass . Harvest data is much higher and on the rise than what is reported by Mrips. I believe that we should keep status quo regulations this year until more accurate data is obtained.

Please reconsider overregulating our scup and Black Sea bass.

Thank you,

Capt. Richard Roy
Marlintini Sportfishing Inc.

Sent from my iPad

Dustin C. Leaning

From: Robert Beal
Sent: Sunday, February 6, 2022 5:44 PM
To: Dustin C. Leaning
Subject: FW: [External] Proposed 2022 Scup and Sea Bass regs.

From: Capt. TJ Karbowski <tedkarbowski@yahoo.com>
Sent: Friday, February 4, 2022 7:39 PM
To: Michael Pentony <michael.pentony@noaa.gov>
Cc: Robert Beal <rbeal@asmfc.org>; Justin Davis <justin.davis@ct.gov>
Subject: [External] Proposed 2022 Scup and Sea Bass regs.

Hello Mr. Pentony.

Regarding Scup and Sea Bass regs. I am a lifelong recreational fisherman and have been a full-time charter Captain fishing exclusively for a living since 2003. With only 1 partyboat as the exception, myself and the Connecticut for-hire fleet fishes from mid- May till mid-November.

Old MRIP was not great and sparked much debate and criticism. Why they replaced it with a system supposedly based on “postcards” that inflates the numbers even more has resulted in even more criticism. Those of us in the industry feel it was implemented to be used as a weapon to put us out of business. The “new” MRIP numbers are literally impossible and defy the laws of physics.

This new math has discredited the ASMFC and has turned the fisheries regulation process into a joke. Words cannot express how frustrating this is. I am aware that these new calculations were “peer reviewed” by satiations at the University of Colorado.

Did the review team take into account fish migration?

Did the review team take into account water temperature?

Did they take into account season closures imposed by each state?

Did they take into account that in New England that almost all of recreational fishing is done only between the end of May (Memorial Day) and the 3rd week of August when kids go back to school?

Did they take into account weather days?

Did they take into account perigee moon phases that can last up to a week that it makes even keeping a bait on the bottom virtually impossible?

Did they account for Hurricanes and Tropical storms and the effect they have on both the fishery and fishing effort?

Did they take into account the ebb and flow of forage fish abundance from year to year? I can go on...

The employees at NOAA, the ASMFC or MRIP are either on a crusade to eliminate the ocean of recreational fishing or there is just plain and simple gross government incompetence being displayed before our eyes. These are the only logical explanations.

Examples-

As of the writing of this email, Friday Feb. 4th, the most recent numbers I can find on the web are from 2019. The MRIP website query tool is currently not working for me to get the 2021 numbers, but I have heard they are even higher.

Published 2019 CT MRIP numbers:

Tautog- MRIP reports CT recreational anglers harvested **273,170 keepers** in **Nov/Dec** which is only opened for the 28 days of November and CLOSED in December. That's **9,756 keepers every day regardless of weather by just recreational fisherman** with the majority boats already hauled for winter.

Black Seabass- CT recreational anglers harvested **111,971 keepers** in **Nov/Dec**. My logbook shows I personally did not even catch 1 on our boat during the 2 weeks of November we were still fishing. That's **1,866 fish** a day harvested by CT recreational anglers. Does anyone believe CT harvested 495,701 in 2019? (2,183 everyday) from May 19 to year end. In Central Long Island Sound seabass are only available for 5 -6 weeks in the Spring.

Bluefish- **May/June** MRIP reports **121,712 harvested from SHORE** when they don't even enter Long Island Sound until late July and August? Where in CT. is this happening? (**2,028 per day** from shore)

Fluke- **Sept/Oct**, fluke are only opened for 30 days of September and CLOSED in October- shore anglers caught **5,517** in that period MRIP says.

Scup- Wave 3 (**May/June**) **SHORE harvested 494,619** divided by 60 days is **8,243 fish every day**. Impossible.

Maybe I should sell my boat and start shore fishing.

On several occasions during ASMFC webinar meetings ranging from 60 to over 100 members in attendance, I have asked the question if anyone on the webinar actually had ANY confidence in the new MRIP numbers; not a single person spoke up. Not management, employees, or the general public. NO ONE.

How can we be expected to comply with numbers that those in charge will not even publicly admit they have confidence in? This is insane.

Without credibility no one will ever believe or follow the regulations. Have you ever heard the story of “The boy who cried wolf”? That’s the current situation with the “New MRIP”.

I am a conservationist. I stand by principals of ecosystem management and having a healthy predator/prey ratio but the methods that are now being used are counter productive. These insane proposed cuts of (28%) sea bass (60%) scup are totally unwarranted. Anyone who has actually spent any time on the water can poke large holes in almost every statistic of the new MRIP and if more people were paying attention, the discrediting of “New MRIP” would be on the prime time news.

Please either keep our regs status quo for 2022 or allow the “Harvest Control Rule” to be used for crafting this years regulations and stop this insanity.

Thank you,
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