

PUBLIC SUBMISSION

As of: 5/5/23, 11:27 AM
Received: April 18, 2023
Status: Posted
Posted: April 19, 2023
Tracking No. lgm-rbpm-5xb3
Comments Due: May 03, 2023
Submission Type: API

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0009

Comment from Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

I would like to see the spring cod season in Rhode island reopened. The months you are closing it are the months small boat fisherman have the best opportunity to catch cod relatively close. By august the ride is 28 miles or more. With the price of fuel and limited weather days you are causing a hardship for small boat recreational fisherman.

I do not know the science behind the regulations but I can attest cod numbers are getting better here each year. Cod are being caught by guys fishing for blackfish, and this is a common occurrence. In a past NOAA article it was established that cod were spawning behind block island in the winter. What sense does it make to let charter boats fish on these fish then when they are congregated and spawning. Why not close it then and reopen in Arril or May after spawning. incremental changes would have been easier to accept. Going from a 10 fish limit and open season to the current regs was way to drastic a change.

PUBLIC SUBMISSION

As of: 5/5/23, 11:25 AM Received: April 18, 2023 Status: Posted Posted: April 18, 2023 Tracking No. lgm-lw8c-9j6y Comments Due: May 03, 2023 Submission Type: API
--

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0007

Comment from Chomen, Leo

Submitter Information

Name: Leo Chomen

Address:

Mystic, CT, 06355

Email: leochomen@gmail.com

Phone: 860-460-2559

General Comment

Sweet-love it-Hate the closed season but glad we will get May! Thanks so much-not sure when this will take effect though-all is appreciated

PUBLIC SUBMISSION

As of: 5/5/23, 11:40 AM
Received: April 19, 2023
Status: Posted
Posted: April 20, 2023
Tracking No. lgo-65u0-tl55
Comments Due: May 03, 2023
Submission Type: API

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0011

Comment from Thurston, Steve

Submitter Information

Name: Steve Thurston

General Comment

Thank you for proposing these changes to Georges Bank codfish regs. I am in favor of it, with the season open in May, allowing private recreational fishers access to a body of fish that are closer to shore at that time of year, as opposed to waiting till August, when the fish are prohibitively further off shore. I also agree with eliminating the slot size limit. I'm not a scientist, but I'm convinced catching and releasing fish outside the limit results in unnecessary mortality. I would also be in favor of a winter spawning season closure for both for-hire and private recreational boats. Taking spawning fish just seems like a bad idea.

PUBLIC SUBMISSION

As of: 5/5/23, 11:41 AM
Received: April 20, 2023
Status: Posted
Posted: April 21, 2023
Tracking No. lgp-b1oq-bx0m
Comments Due: May 03, 2023
Submission Type: Web

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0012

Comment from Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

This is bad

PUBLIC SUBMISSION

As of: 5/5/23, 11:45 AM
Received: April 22, 2023
Status: Posted
Posted: April 24, 2023
Tracking No. lgs-j29w-u2m0
Comments Due: May 03, 2023
Submission Type: Web

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0016

Comment from Rhode Island Party and Charter Boat Association

Submitter Information

Email: makosrule@verizon.net

Organization: Rhode Island Party and Charter Boat Association

General Comment

See attached file(s)

Attachments

2023 Recreational Groundfish Comments



R.I. Party and Charter Boat Association
P.O. Box 171
Wakefield, RI 02880
401-741-5648
www.rifishing.com



President
Vice President
Treasurer
Secretary
Director

Capt. Rick Bellavance
Capt. Steve Anderson
Capt. Andrew D'Angelo
Capt. John Rainone
Capt. Nick Butziger

April 22, 2023

Mr. Kyle Molton
Fishery Management Specialist
NOAA Fisheries
Greater Atlantic Regional Office

RE: Northeast Multispecies Fishery FY 2023 Recreational Measures

The Rhode Island Party and Charter Boat Association (RIPCBA) is an association of 55 small businesses and boat owners that operate party and charter fishing boats out of Rhode Island. The charter and party fleet operates year-round, with the busiest fishing season running from May through December. We would like to offer the following comments regarding proposed FY 2023 recreational groundfish measures.

GOM COD:

The RIPCBA supports the proposed measures for GOM COD for FY 2023. As noted in the proposed rule, the RAP, Groundfish Committee, and Council recommended these measures and analysis suggests these measures will allow the recreational fishery to achieve but not exceed the GOM Cod recreational Sub-ACL.

GOM HADDOCK:

The RIPCBA Strongly supports the proposed recreational measures for GOM Haddock. We recognize that the RAP, Committee, and Council recommended measures, that were different from the proposed rule, which would have established the same set of measures for Private and Charter/Party vessels. After considering the proposed measures, we believe setting mode specific measures for Private vessels and Charter/Party vessels will better account for the differing needs of the two recreational modes. Charter/Party vessels are more likely to be able to search out slightly larger fish and the marketing benefits of a higher bag limit is a point we have raised before across numerous FMP's. The Private recreational mode accounts for a larger portion of the recreational catch and allowing those vessels a smaller size with a slightly smaller bag limit could help with discard mortality. The proposed measures speak to the differing needs of the two modes, and we support that type of management. As we read the proposed rule, it appears analysis would determine the proposed measures will keep the recreational fishery under its Sub-ACL.

GB COD:

The RIPCBA supports the proposed measures for GB COD for FY 2023. Although these measures will greatly impact our businesses, we understand the need to reduce mortality to rebuild GB COD.

The current measures which closed May, June, and July will not be as effective at reducing mortality as the proposed June, July, and August closure. We believe closing the month of August will limit directed effort on Cod at a time when the water is warmer, helping with discard mortality. Overall effort is lower in May compared to August and any fish released on the few directed Cod trips will survive better.

The current size slot of 22-28 inches was problematic in our eyes. Compliance was an issue in some places, and we do not believe the conservation benefit was fully recognized with the slot. We support the proposed 23-inch minimum size but recommend lowering it to 22 inches in the future when possible. This would be in line with the current GOM minimum size.

We would like to point out that the 5 fish possession limit has dramatically reduced the targeted Cod fishery in the charter/party mode.

Lastly, we support efforts by the NEFMC and NOAA fisheries to work with the states of NY and NJ as they consider implementing complimentary Cod measures in state waters. We note that the State of Rhode Island implements complimentary measures in state waters through the state process.

Respectfully Submitted,

Capt. John Rainone

Capt. John Rainone, Secretary
RI Party and Charter Boat Association

PUBLIC SUBMISSION

As of: 5/5/23, 12:19 PM
Received: May 01, 2023
Status: Posted
Posted: May 02, 2023
Tracking No. lh5-l5o5-v57v
Comments Due: May 03, 2023
Submission Type: API

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0039

Comment from DiSciullo, Vin

Submitter Information

Name: Vin DiSciullo

Address:

Wakefield, RI, 02879

Email: Vadisciullo@gmail.com

Phone: 401 573 1741

General Comment

To all members,

My name is Vin DiSciullo and have been cod fishing for nearly 60 years. I also have been fishing GB since the early 1990's.

I have spoken to a few of the NOAA members about the recent changes to the cod regulations. As I mentioned to Moira Kelly today, you need to relook at when you implement changes to regulations. I have a group of 6 people planning a cod/haddock trip with the Helen H this coming August. This fishing charter sets their schedule for the 2023 season in January of 2023. I booked on 1/13/23 and now you may change the regulations for this coming August when will planned to fish. How can you make a change mid year. What needs to do be done to make changes effective the following year? If these changes go in effect this year we will cancel our trip.

I do respect what your group is trying to fix. I would also agree that cod stocks are down. I believe that reducing recreational catch will not correct the issue. From my perspective there are less boats from Rhode Island and Massachusetts water's fishing this area. Back in the 90's the Frances fleet, the Yankee fleet and Helen H went to George's. Today it's only the Helen H. How can 10 to 12 trips a year cause a reduction in cod stock? Back in the 90s I would do multiple trips a year, now it's one year.

The restrictions that you have implemented has already limited the amount of trips charters will do. There is not enough demand to do these trips with such tight restrictions and you want to restrict more.

Sincerely,

Vin DiSciullo

PUBLIC SUBMISSION

As of: 5/5/23, 1:10 PM
Received: May 02, 2023
Status: Posted
Posted: May 03, 2023
Tracking No. lh6-woa5-oe74
Comments Due: May 03, 2023
Submission Type: Web

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0045

Comment from Massachusetts Striped Bass Assn

Submitter Information

Email: BasicPatrick@aol.com

Government Agency Type: Regional

Government Agency: Massachusetts Striped Bass Assn

General Comment

Please accept the attached letter as public comment on the proposed 2023 recreational fishing measures for Gulf of Maine Cod & Haddock and Georges Bank Cod. I request the specific questions included are addressed in the final rule.

Attachments

MSBA 2023 GF Comments



**Massachusetts
Striped Bass Association**

Since 1950

May 2, 2023

To: Kyle Molton
National Marine Fisheries Service

From: Patrick Paquette
61 Maple Street
Hyannis MA, 02601

RE: Public Comment on Proposed 2023 Recreational Fishing Regulation for Gulf of Maine Cod & Haddock and Georges Bank Cod.

Reference: NOAA-NMFS-2023-0054

To Whom It May Concern;

I submit this public comment both as a member of the New England Fishery Management Council's Recreational Advisory Panel and on behalf of the Massachusetts Striped Bass Association (MSBA) whom I serve as Gov't Affairs Officer. Incorporated in 1950, MSBA has long been considered one of the leading voices representing the MA Recreational Fishing Community; especially the regions private anglers who are often left behind in the public process.

Gulf of Maine COD:

I agree with the explanation of the decision and support final approval & implementation of the NEFMC recommended 2023 recreational fishing measures for Gulf of Maine Cod.

Georges Bank Cod:

I agree with the explanation of the decision and support final approval & implementation of the NEFMC recommended 2023 recreational fishing measures for Gulf of Maine Cod.

Gulf of Maine Haddock:

I disagree on many points with the explanation of the process, the reasoning behind the split mode approach and the scientific analysis used to justify the proposed regulations for 2023 recreational Gulf of Maine Haddock. ***I urge you to reject what has been proposed, reconsider and approve the measures proposed by the NEFMC.***

The following are my points of disagreement and explanation of that disagreement. ***I ask you to consider my points in your final decision making and address these points in the final rule announcement:***

1. *RAP desire for 15 fish bag limit:* This proposal describes the reason behind the RAP's pursuit of a 15 fish bag limit over a 10 fish bag limit as an attempt to "preserve

bookings for party and charter operations.” This reasoning is incomplete, presented without context and does not accurately reflect the RAP discussion. Although marketing was a stated priority for some members of the RAP, I can assure you there were other members that wanted the same for private anglers & the tackle industry because I am one of those members. It is hard not to notice you fail to mention another statement from that discussion by RAP member Captain Tim Tower who operates a party boat and stated, “10 fish is enough for us.” Cherry picking statements by individual members of the RAP (or any committee) negates the process of decision making. Using individual statements to summarize a discussion is wrong and should not be used as justification for any management action. It is for this reason ***I urge you to remove or re-word the summary of the RAP discussion to accurately describe the RAP pursuit of a 15 fish bag limit was intended to include all recreational anglers.***

2. *Split Mode Regulations:* The record of prior RAP discussions shows multiple votes that have rejected split mode regulations. The issue of split mode regulations is highly controversial and filters throughout management in ways often not considered at the time. It is my belief that any consideration of split mode regulations must include discussion of stakeholder representation, monitoring & reporting, financial burden, and allocation. These controversial subjects are better addressed in “FMP Amendment” level management actions with public input a required part of the process. This is another reason I disagree with your assumption that a split mode satisfies a RAP desire. It does not. ***I urge you to remove or re-word the summary of the RAP discussion to accurately describe the RAP pursuit of a 15 fish bag limit was intended to include all recreational anglers.***
3. *Responsibilities of NOAA Fisheries & NEFMC:* This proposal offers statistical analysis that shows very few for-hire trips catch over 10 haddock. The RAP was presented and considered the same analysis. This proposal claims the 15 fish bag limit is proposed for marketing purposes to benefit the for-hire industry but is not expected to be achieved on most trips. I disagree that NOAA Fisheries has a responsibility to consider marketing as a justification for a conservation measure. NOAA Fisheries should NOT be offering data and using a justification that could accurately be described as misleading the public. Marketing and industry considerations are Council level responsibilities and NOT the responsibility of NOAA Fisheries while considering conservation efficacy of a recommended management action. ***This is another reason I urge you to support the original recommendation by the NEFMC.***
4. *Recreational Ground fishing & Distance from Shore:* I disagree with the statement that “Advisors on the RAP have suggested that private anglers are more likely to fish closer to shore than for-hire vessels and therefore may encounter fewer large haddock...” Again this proposal is cherry picking a single statement and presenting it as advice to management from the RAP. The record shows no actual discussion of this point at the most recent RAP meeting, and I suggest an actual discussion at the RAP would result in a much different conclusion. ***I urge you to remove or re-word the summary of the RAP discussion to accurately describe what occurred at the RAP meeting.***

5. *Size of Haddock & Distance from Shore:* I disagree with the underlying assumption that especially within areas known to contain recreational ground fishing effort, larger haddock are caught further offshore. Years of experience recreational ground fishing and attending NEFMC meetings has taught me that all sizes of haddock migrate in, out and across the Gulf of Maine according to time of year, prevailing wind, availability of forage etc. I disagree that distance from shore is a factor that can be used to predict a difference in the size of haddock caught between private and for-hire recreational anglers. ***I request the final rule present data & analysis that support this claim.***
6. *Relevant MRIP & APAIS Data:* In response to the claim that for-hire anglers fish further offshore and catch larger fish than private anglers, I contacted the MA Division of Marine Fisheries and requested the attached analysis. MA DMF sourced data from both MRIP & APAIS. I have attached that data to this letter. Please note the following statement: ***"The data suggests there is very little difference of landed haddock across modes. Haddock anglers use similar tackle and fish in similar areas, reducing the potential size selectivity."*** This data suggests your conclusions regarding where recreational anglers fish and an assumed difference in the number of dead discards and size of fish within a split mode regulation is either supported or inconclusive. In either case the data clearly can not be used to determine a conservation benefit from the split mode regulation when compared to the original NEFMC regulation. ***I offer this evidence as opposition to this proposal and urge you to reject the idea of split mode regulations and approve the NEFMC recommendation.***

In conclusion, the RAP, NEFMC Groundfish Committee & NEFMC adequately considered multiple options for the 2023 recreational GOM Haddock fishery. The NEFMC considered conservation benefits and considered consequences such as dead discards. NEFMC members also consider other factors such as enforceability of regulations, industry priorities and public opinion. Your explanation is clear that the NEFMC proposed regulation meets conservation standards and I urge you to reject this proposal and approve the NEFMC proposal of a status quo season (March Closed); a 15 fish bag limit and an 18 inch minimum size.

Thank You for consideration of these comments.

Sincerely;



Patrick Paquette
Gov't Affairs Officer
Massachusetts Striped Bass Assn.
NEFMC RAP (member)
781-771-8374

CC: Michael Pentony; Regional Administrator,
Dan McKiernan; Director; MA DMF
Melanie Griffin; NFMF & MA DMF
Frank Blount; Chairperson, NEFMC RAP
Mike Jones; President, MA Striped Bass Assn.

Response to query on recreationally caught Gulf of Maine Haddock by mode

MADMF staff

4/27/2023

Request date: 4/19/23

Original text of the request:

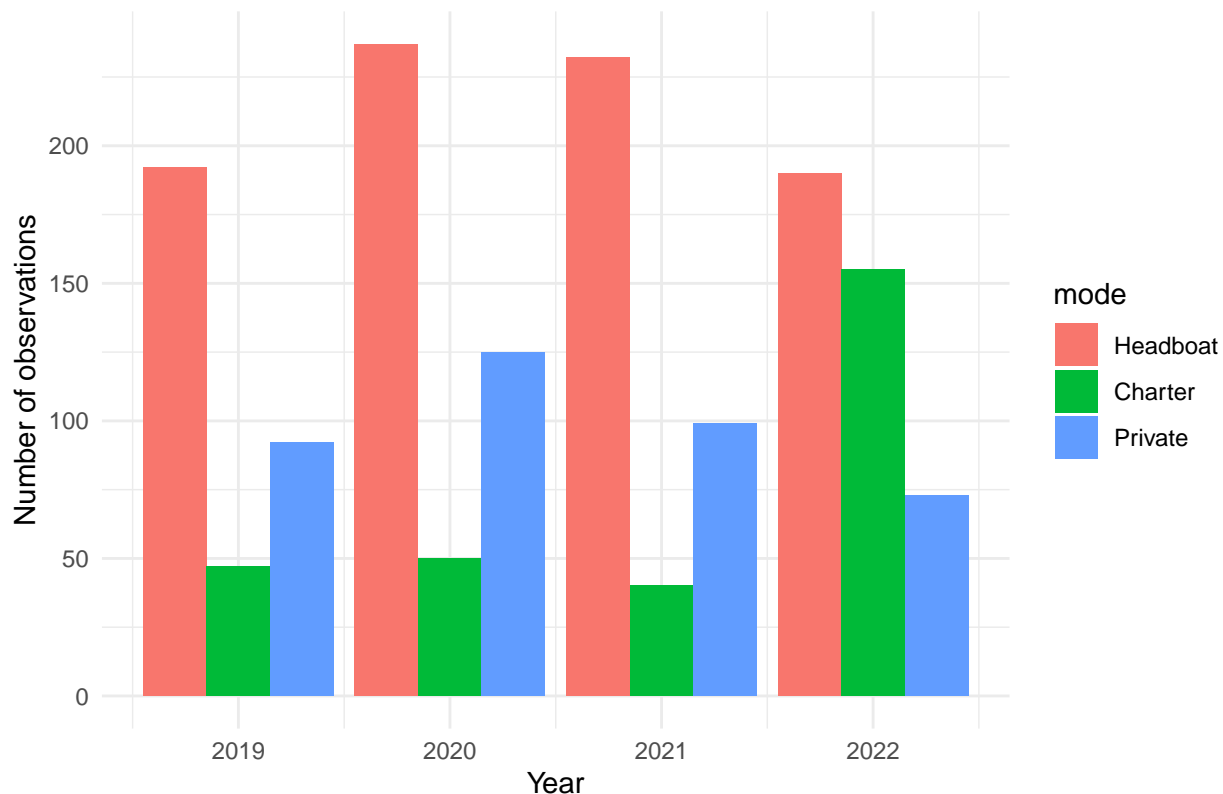
I am developing comments for multiple organizations in response to the recent GARFO proposed 2023 haddock regulations. I am seeking MRIP data collected in MA that details the observed size of haddock caught & retained by anglers in MA.

Specifically I want compare observed size of haddock caught by private anglers to observed size of haddock caught on both for-hire & head boat trips. I am also interested in the actual number of observed/measured haddock in each category (private, for-hire & head boats).

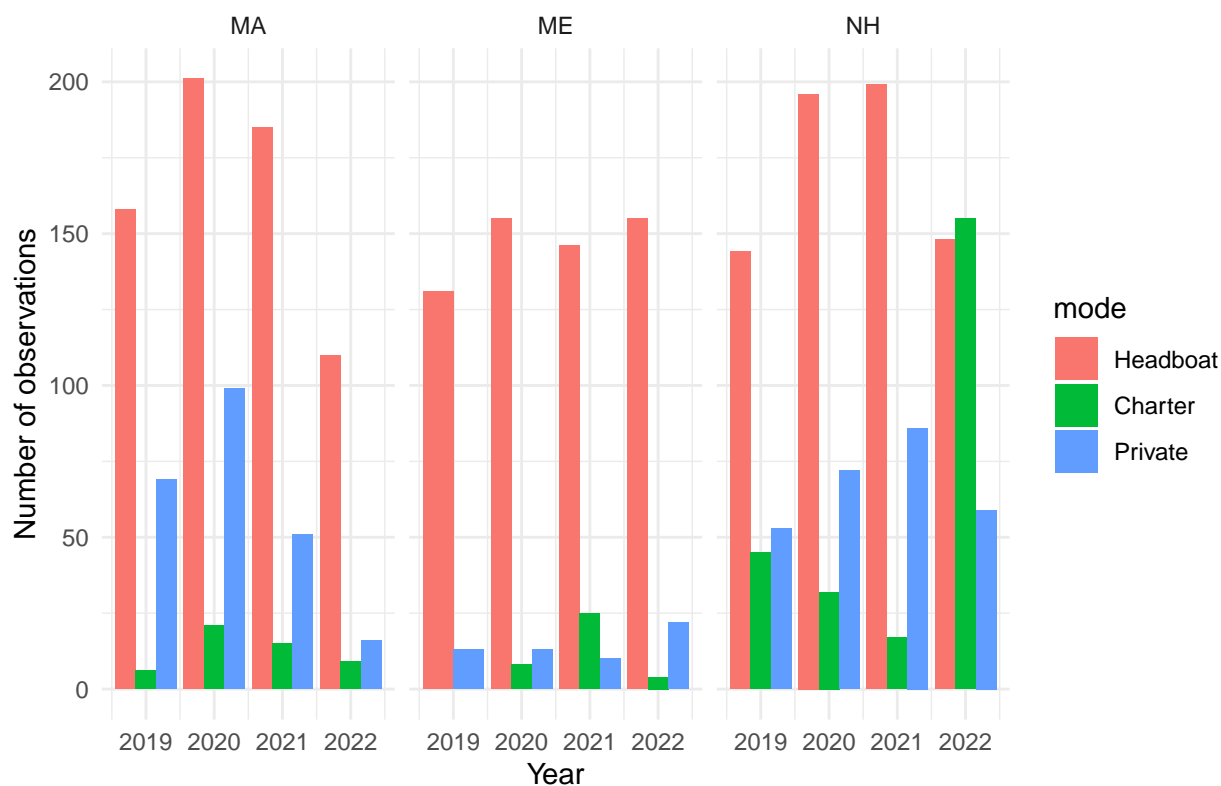
Data are sourced from the Marine Recreational Program (MRIP) Angler Point Intercept Survey (APAIS) and were accessed on 4/20/23

Compare actual number and observed size of haddock caught by private anglers to observed size of haddock caught on both for-hire & head boat trips.

Count of APAIS GOM haddock length observations by mode

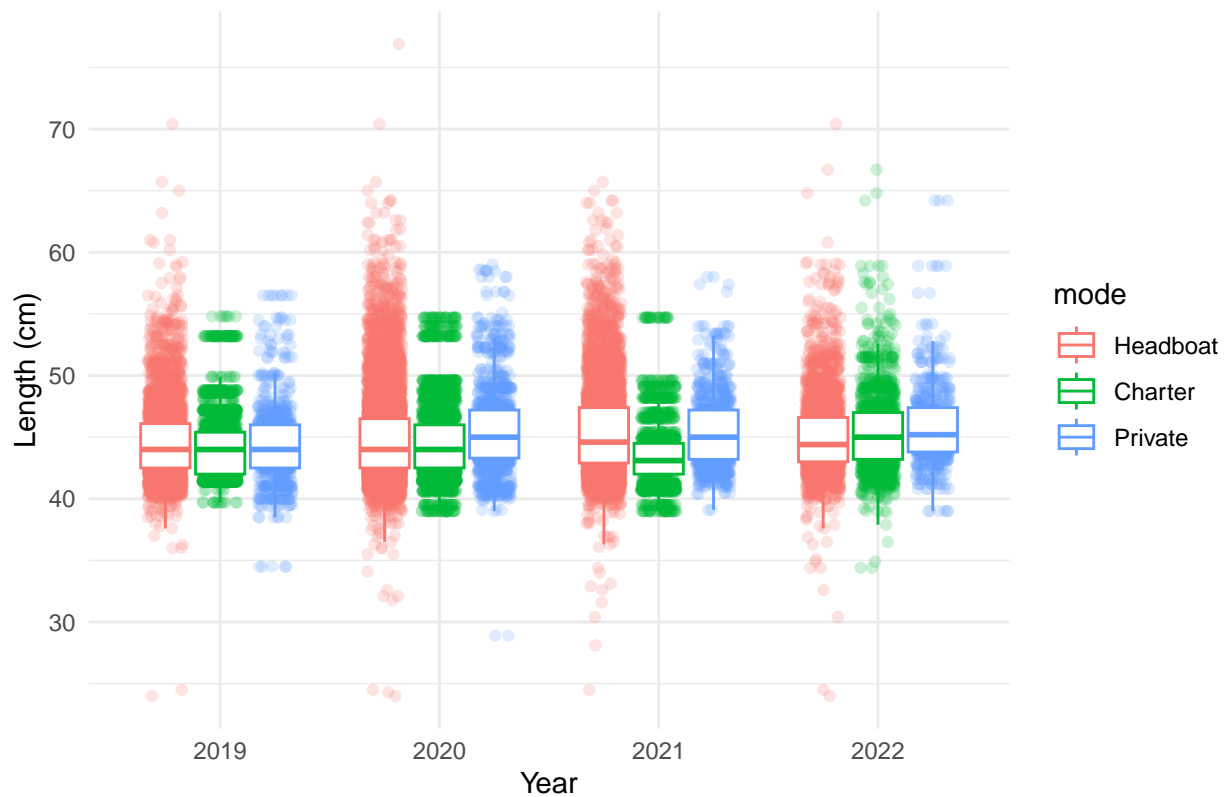


Count of APAIS GOM haddock length observations by mode and state



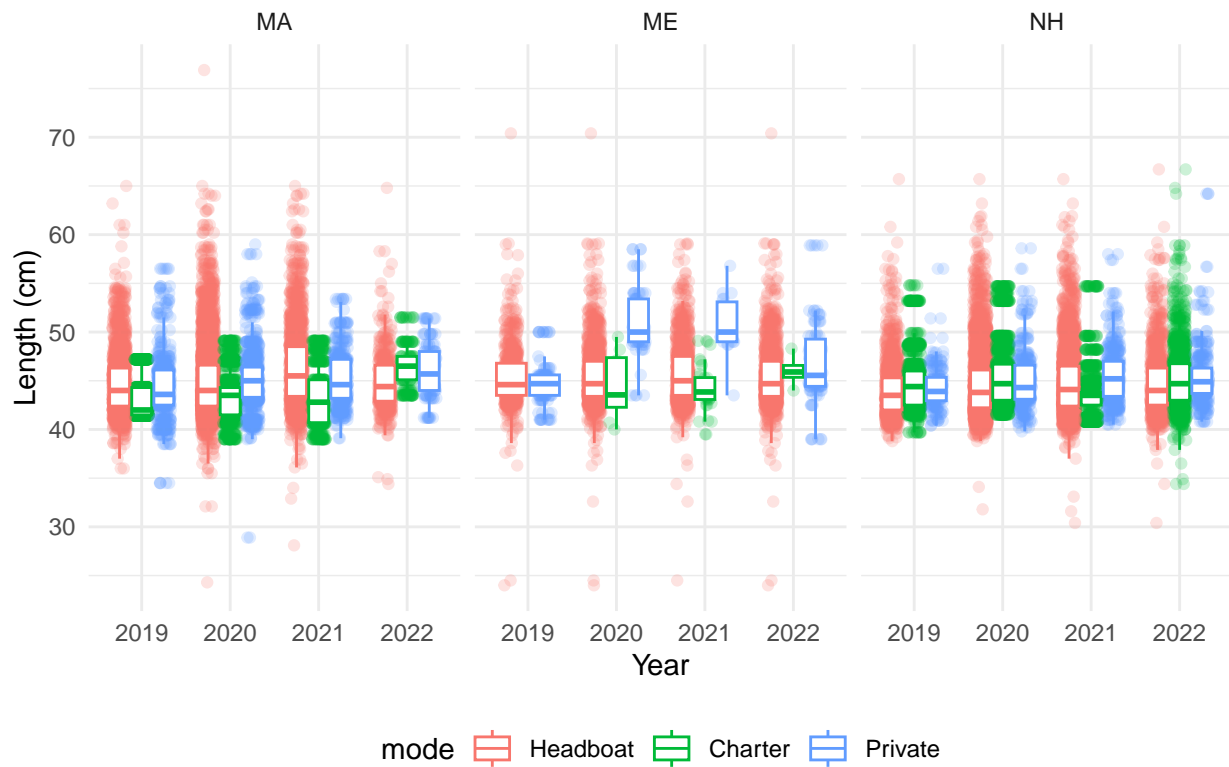
Headboats had the greatest count of length observations across years. Headboats may have more observations because the MRIP sampler is on-board and has the opportunity to measure fish before they are fileted. In contrast, most charter and private boat anglers filet their haddock at-sea and are therefore unavailable for measurement by a shore-based sampler.

GoM Haddock length observations by APAIS mode



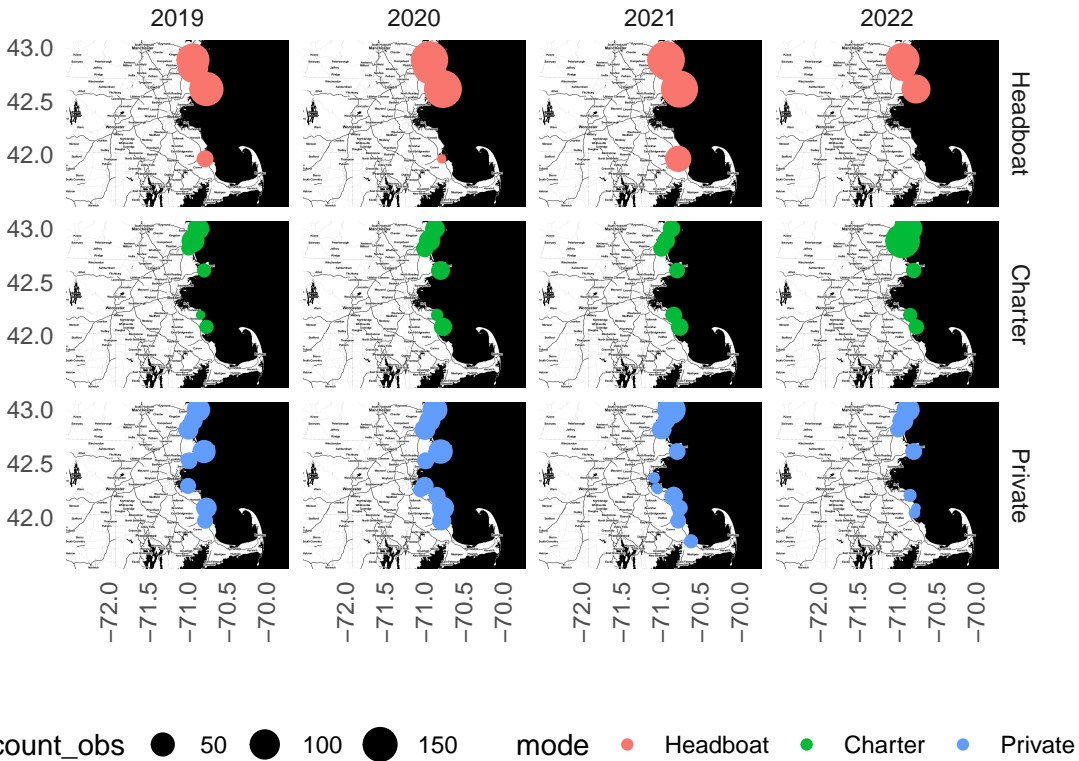
The data suggest there is very little difference in size distribution of landed haddock across modes. Haddock anglers generally use similar tackle and fish in similar areas, reducing the potential size selectivity.

GoM Haddock length observations by APAIS mode and state



Differences within years and states are small enough such that random sample variation cannot be ruled out. For a species with a high bag limit, like haddock, the number of length observations can be somewhat misleading. For example, in Maine mean haddock length caught by private vessels was much larger than other modes in 2020 and 2021. However, this is likely because these fish came from 1-2 intercepts, where the effect of a few large haddock could skew observations.

Spatial distribution of count of APAIS length observations



Data information

Size data and trip data are pulled from:

https://www.st.nmfs.noaa.gov/st1/recreational/MRIP_Survey_Data/CSV/ <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-data-downloads>

All 2022 data are preliminary. Data includes waves 2-5 (March-October). The Fish-level length and weight dataset includes only Type A data- fish that were harvested and available to be measured. This dataset includes fish-level length and weight data and variables required for estimation. Contains one record per fish caught and measured or weighed by the APAIS interviewer. Missing lengths and/or weights are imputed as needed for individual fish records.

PUBLIC SUBMISSION

As of: 5/5/23, 1:12 PM Received: May 03, 2023 Status: Posted Posted: May 03, 2023 Tracking No. lh7-wa3t-265n Comments Due: May 03, 2023 Submission Type: Web

Docket: NOAA-NMFS-2023-0054

Fisheries of the Northeastern United States; Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Comment On: NOAA-NMFS-2023-0054-0001

Fisheries of the Northeastern United States: Northeast Multispecies Fishery; Fishing Year 2023
Recreational Management Measures

Document: NOAA-NMFS-2023-0054-0046

Comment from Costa, Paul

Submitter Information

Name: Paul Costa

Address:

Massapequa, NY, 11758

Phone: 5167243891

General Comment

I believe the extension of the cod by one month would not impact the species for the reason that in the month of may only a select amount of boat fish for this species