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**RECREATIONAL ANGLERS  
WORKING TO CONSERVE, PROMOTE, AND ENHANCE MARYLAND'S  
MARINE RESOURCES**

May 30<sup>th</sup>, 2017

Via email only to: [jbeaty@mafmc.org](mailto:jbeaty@mafmc.org)

Executive Director Chris Moore  
Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201,  
Dover, Delaware 19901

**RE: Chub Mackerel Amendment Scoping Input**

Executive Director Moore:

On behalf of the members of Coastal Conservation Association Maryland (CCA MD) we are pleased to provide the following input regarding the addition of Chub Mackerel as a Stock in the Mackerel, Squid, and Butterfish Fishery Management Plan.

Chub Mackerel are an important prey species for many predators in the Mid-Atlantic region. They play an important role as forage in regional marine ecosystems, moving energy throughout the food web to the larger predators that eat them.

Many well-established recreational, charter, and tournament fisheries have been built on the pursuit of such HMS predators; specifically marlin, swordfish, tuna, dolphin fish, wahoo, and sharks. It is an abundance of species like chub mackerel, squid, and other forage in the Mid-Atlantic that acts as the foundation of such offshore HMS fisheries, which ultimately generate massive economic benefit and thousands of jobs in many coastal towns. Pilot whales are another important predator that spend much of the summer and early fall in the same areas where chub mackerel abundance is continually noted by many HMS fishermen.

Tournaments also highlight the immense economic value of largely catch and release billfish fisheries to the region. The conservation of billfish species continues to benefit to towns like Ocean City, Maryland, which is proud to host the White Marlin Open, and be considered the White Marlin Capital of the World.

HMS based recreational, charter, and commercial fisheries also provide important access for many to species that are a highly valuable food source for the nation. In contrast, the peak historical catch of the low value of chub mackerel is limited in overall value both as a food source and in overall economic benefit.

We commend the Council for the development of the Ecosystem Approach to Fisheries Management Guidance Document, and appreciate the complexity of shifting away from single species based management action.

Considering such guidance, we encourage the Council to consider and include the following elements when establishing the amendment:

- Provide for a broad range of stakeholder involvement in the amendment process by adding advisors with experience in the operation of, and economics of HMS based fisheries through appropriate advisory panels, FMAT, and SSC discussions.
- Include the protection of existing HMS based fisheries in the goals and objectives of the amendment, and definition of Optimum Yield for the chub mackerel fishery.
- Include a comprehensive analysis of the economic impact of existing private recreational, charter, and tournament fisheries, including spatial and seasonal effort and benefit.
- Include options that would cap the chub mackerel fishery at historic levels to ensure no negative impacts to existing fisheries.
- Include risks to the existing HMS fisheries in all of the terms of reference for the management of chub mackerel, as well as impacts on other managed and unmanaged species by increased effort and bycatch.
- Ensure a comprehensive suite of management alternatives to mitigate any impacts to existing HMS based fisheries, and potential conflicts with industrial level removals of chub mackerel during periods of peak abundance of predators in the region.

We appreciate the opportunity to on this action, and urge the Council to carefully consider the existing ecological balance, and economic benefit that exists in the region, and may be impacted by an increase in chub mackerel harvest at this time.

Regards,



Frank Bonanno  
Chairman



David Sikorski  
Executive Director

CC: Maryland MAFMC Members  
Mark Belton, Secretary MD DNR  
Dave Blazer, Director MD DNR Fishing and Boating Services