



State of New Jersey

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Kirby Rootes-Murdy, Senior Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
Email: krootes-murdy@asmfc.org

Subject: Draft Addendum XXVIII

Dear Mr. Rootes-Murdy:

I am writing regarding the Atlantic State Marine Fisheries Commission (ASMFC) Draft Addendum XXVIII (Addendum); the State of New Jersey has serious concerns with and opposes all options presented within the Addendum.

The New Jersey Department of Environmental Protection (DEP) has undertaken an extensive analysis of the Addendum and finds that the proposed options do not meet the intended objective of protecting the stock of the species and do not set equitable harvest limits for the fishing industry. As proposed, the Addendum will serve as a de facto moratorium on summer flounder for the recreational fishing industry in New Jersey.

Summer flounder is one of New Jersey's most important recreational fish species. Anglers from New Jersey and surrounding states routinely plan their Jersey shore vacations to coincide with the summer flounder season. The Addendum threatens to jeopardize businesses such as bait and tackle shops and party and charter boats that cater to recreational anglers. The recreational fishing industry, which provides more than \$1.5 billion economic benefits annually and directly supports 20,000 job in New Jersey, would be devastated.

The Addendum states that: "... [a] fundamental goal of Commission fishery management plans is to provide recreational anglers with fair and equitable access to shared fishery resources..." However, the ASMFC further admits they face challenges, "determining what is meant by fair/equitable/reasonable access, and how to achieve it." To be prudent, the ASMFC should obtain the data necessary to ensure that they fully understand what is meant by "fair/equitable/reasonable access" and how to achieve it before making such a consequential decision.

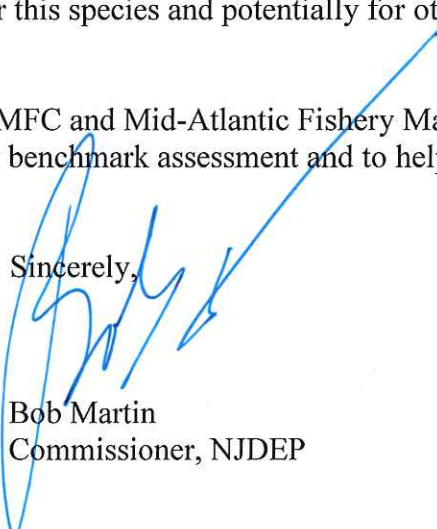
In the short-term, New Jersey urges the Commission to maintain the status quo by keeping the 2016 management measures in place. This action must be followed by an immediate benchmark stock assessment, which has not been conducted since 2013 and is long overdue. Based on updated data from the benchmark assessment, ASMFC should revisit the commercial and recreational harvest limits for the 2018 season.

In the long-term, New Jersey strongly recommends that members of the ASMFC work in coordination with federal government to create a new paradigm regarding the management of this species. If the purpose of the ASMFC is to protect the summer flounder stock while also providing equitable harvest limits for the recreational and commercial fishing industry, then annual quota shifts that are not based on the most recent science and modeling are of questionable value. Furthermore, a process created in an attempt to manage a migratory fish species based on the assumption that state boundaries extend out into the ocean, while not fully incorporating changing water temperatures which clearly have an impact on these migratory patterns, must be reexamined. The ASMFC should adopt a system where management measures are implemented for a minimum of three years in order to determine the effect the measures have on the fishery.

Again, I urge the ASMFC to keep the status quo for the 2016 season and initiate an immediate benchmark stock assessment. This will allow for the best available data and science to factor into a decision which would have a devastating effect on New Jersey's fishing industry. In the long-term, I respectfully urge the ASMFC to reexamine the methodology in order to create a new paradigm in fisheries management for this species and potentially for other species as well.

New Jersey is ready to assist the ASMFC and Mid-Atlantic Fishery Management Council (MAFMC) to develop and implement a new benchmark assessment and to help ensure that it is completed as swiftly as possible.

Sincerely,



Bob Martin
Commissioner, NJDEP