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June 8, 2015

Dr. Christopher M. Moore
Executive Director, Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, Delaware 19901

Subject: Blueline Tilefish Scoping Comments

The Virginia Saltwater Sportsman Association (VSSA) is a new and growing organization of recreational fisherman in the Commonwealth of Virginia. Our mission includes representing the interests of Virginia's recreational saltwater anglers, ensuring the long-term sustainability of Virginia's fisheries, while protecting Virginia's marine, boat and tackle industry jobs

VSSA supports the emergency management measures for the blueline tilefish fishery in the Greater Atlantic Region as recommended by the Mid-Atlantic Fishery Management Council. It is imperative this emergency measure be approved as a long term regulation. The VSSA position is that a Fishery Management Plan (FMP) be developed and implemented for blueline tile, golden tile, and grouper as a deep water complex management plan. We don't believe other deep water fish like black belly rose fish need to be managed in this FMP.

It is the VSSA position that reasonable recreational limits be established for these species. VSSA supports the current Virginia regulations which combines blueline and golden tile into a combined 7 tile (golden or blueline) recreational limit as well as 1 grouper per person. We believe that the current 8 golden tile with the new 7 blueline tile per person is excessive and may lead to continued overfishing. A combined limit of 7 tile (golden or blueline) is plenty of meat for any recreational angler or charter/head boat. The FMP and long term management measures should consider Virginia limits for the entire Greater Atlantic region. The SAFMC recreational limits on golden and blueline tile is far too conservative for the mid and greater Atlantic waters. There is far greater pressure on tile in SAFMC waters due to the shorter distances to travel vice the larger distances in the mid and greater Atlantic regions where the pressure is less.

VSSA supports strict limits for commercial fishing of both blueline and golden tile.

VSSA supports mandatory reporting of these species but objects to the current double reporting currently required for charter / head boat operators. Currently a charter and head boat operating in Virginia is required to report catches to both the state and federal government. It is desired that operators only report to a single organization and that single organization share the report with all state and federal organizations requiring that data. Requiring double reporting for a single trip is burdensome on small charter / head boat operations.

Thank you in advance for your consideration.

Respectfully,

Mike Avery, Hampton, VA 757-329-5137, mike@averys.net

Approved by VSSA Board Members

CC: Rob O'Reilly, Virginia Marine Resource Commission
Jeff Deem, Virginia Repetitive to MAFMC