



Mid-Atlantic Fishery Management Council
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MEMORANDUM

Date: August 1, 2018
To: Council
From: Matthew Seeley, Staff
Subject: August 2018 briefing materials on scoping comments regarding the bluefish allocation amendment

The Mid-Atlantic Fishery Management Council and the Atlantic States Marine Fisheries Commission have proposed to develop a Bluefish Allocation Amendment. This amendment was initiated in order to review/revise the FMP goals and objectives, commercial/recreational allocations, commercial allocations to the states, the quota transfer processes, and any other issues. Additional information and amendment documents are available at:

<http://www.mafmc.org/actions/bluefish-allocation-amendment>.

The scoping process commenced from publication in the Federal Register on June 6, 2018 and continued through July 30, 2018. Scoping is the process of identifying issues, potential impacts, and reasonable alternatives associated with a particular management issue. It provides the first and best opportunity for the public to make suggestions or to raise issues and concerns before development of an amendment begins. No alternatives are set during the scoping process.

Twelve public scoping hearings were held from Massachusetts through North Carolina and were attended by approximately 114 people. Of the 114 people, 53 individuals provided a total of 120 comments representing individuals and organizations from almost all states that had a hearing. The greatest representation was from New Jersey (primarily from those with recreational fishery interests) and New York (primarily from those with for-hire and commercial fishery interests). In addition, a total of 36 written comments were received via email (33), hand delivered (2), or mail (1).

This document summarizes the major themes of written and hearing comments and offers staff recommendations on issues to be included in the amendment for further development. **The scoping comment summary is accessible at this link:** http://www.mafmc.org/s/BF-scoping-comment-summary_v2.pdf and provides additional information such as detailed scoping hearing summaries and copies of all the received written comments.

Table 1: Summary of major written comment themes, and number received. Since most commenters addressed multiple issues, numbers do not add to total number of submitted written comments.

Issue	Number of written comments received	Number of hearing comments received
FMP Goals and Objectives		
Supports status quo	1	3
Goals and objectives should be re-evaluated and/or revised	2	0
Supports maintaining one or more of the current objectives	0	1
Commercial/Recreational Allocation		
Supports status quo	19	31
Increase commercial allocation	0	2
Decrease commercial allocation	1	0
Increase recreational allocation	0	0
Decrease recreational allocation	0	1
Update data for reallocation	1	6
Commercial Allocations to the States		
Supports status quo	3	14
Alter commercial allocations to the states	4	7
Quota Transfer Processes		
Supports status quo transfer from recreational to commercial sector	5	24
Do not allow transfer from recreational to commercial sector	6	0
Supports status quo state-to-state transfers	2	0
Do not allow state-to-state transfers	0	1
Do not allow any transfers	1	1
New transfer suggestion	1	1
Other Issues		
Status quo bag limit	0	5
Increase bag limit	0	4
Decrease bag limit	4	19
Other	10	0

Staff Recommendations on issues to be further developed/addressed in an Amendment

Staff recommend the further development of issues 1-4 for alternatives in the amendment. Several issues brought up during scoping can be addressed through other processes, as described below.

Issue 1: Update the Fishery Management Plan (FMP) goals and objectives

- Comments mainly supported status quo, but some commenters supported updating the goals and objectives to include language related to recreational management maximizing abundance over landings and considering the economic/intrinsic value of bluefish within the recreational fishery.

Issue 2: Update commercial and recreational allocations

- Comments mainly supported status quo, but many individuals want to see updated data indices/Marine Recreational Information Program (MRIP) estimates. Staff recommend that revised recreational data be considered to determine whether allocation revisions are warranted.

Issue 3: Update state allocations

- The majority of comments supported status quo, but a significant percentage of individuals want to see the commercial allocations to the states updated (with new data and based on more recent landings percentages).

Issue 4: Revise processes related to commercial state-to-state transfers and transfers from the recreational to commercial fishery

- Few specific comments related to commercial state-to-state transfers, but many individuals suggested they did not oppose the opportunity to transfer. Commenters advocated that having the option to request quota can always benefit states in need if other states are willing and able to transfer.
- Comments mainly supported status quo on transferring quota from the recreational to commercial sector, but some support revisions.
 - For-hire fishermen often were not opposed to transferring quota to the commercial sector as long as the recreational sector was not anticipated to meet their quota.
 - Private recreational anglers were often not in favor of transferring quota to the commercial sector as they want their released fish to stay in the water and contribute to future populations. They find it counter intuitive to release fish and then have the quota transferred anyway.
 - Commercial fishermen that offered comments were almost always in favor of this transfer.

Issue 5: Other issues (to be addressed through other processes)

- Update all data and indices with new MRIP estimates.
 - This will be addressed through the operational assessment in 2019 and a future benchmark assessment.
- Review/revise the 15-fish federal bag limit.

- Bag limits are addressed by the Monitoring Committee when setting specifications.
- Recreational management should focus on maximizing abundance over landings.
 - Could be addressed through future goals and objectives.
- Research efforts should be dedicated to identify shifts in bluefish habitat and abundance.
 - This research recommendation can be reviewed by the Council and Scientific and Statistical Committee for potential incorporation into the Council's 5-year research plan.
- Offer consideration to the economic and intrinsic value of bluefish to the recreational fishery.
 - Could be addressed through future goals and objectives.
- Pending analyses and MRIP updates, the recreational sector needs to be accountable for overages.
 - New MRIP estimates will not be able to be compared to old recreational harvest limits.
 - In the future, should the recreational sector exceed their limits, the fishery will be subject to accountability measures detailed in the FMP.