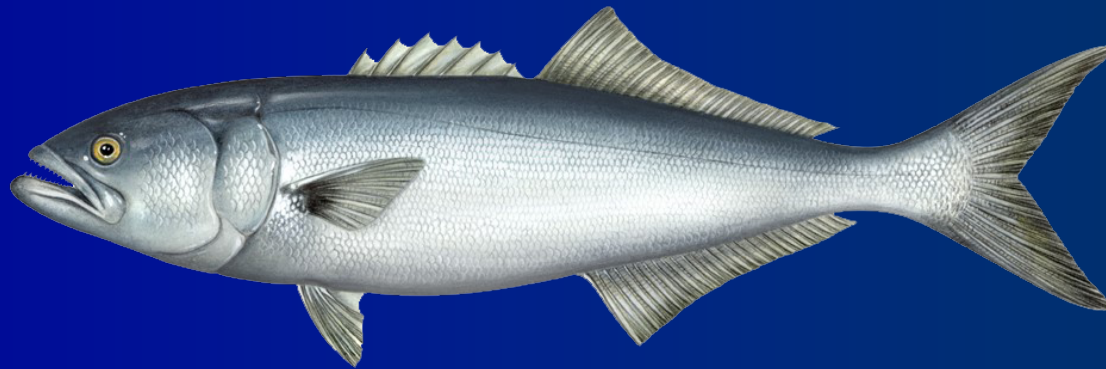




# Bluefish Allocation & Rebuilding Amendment



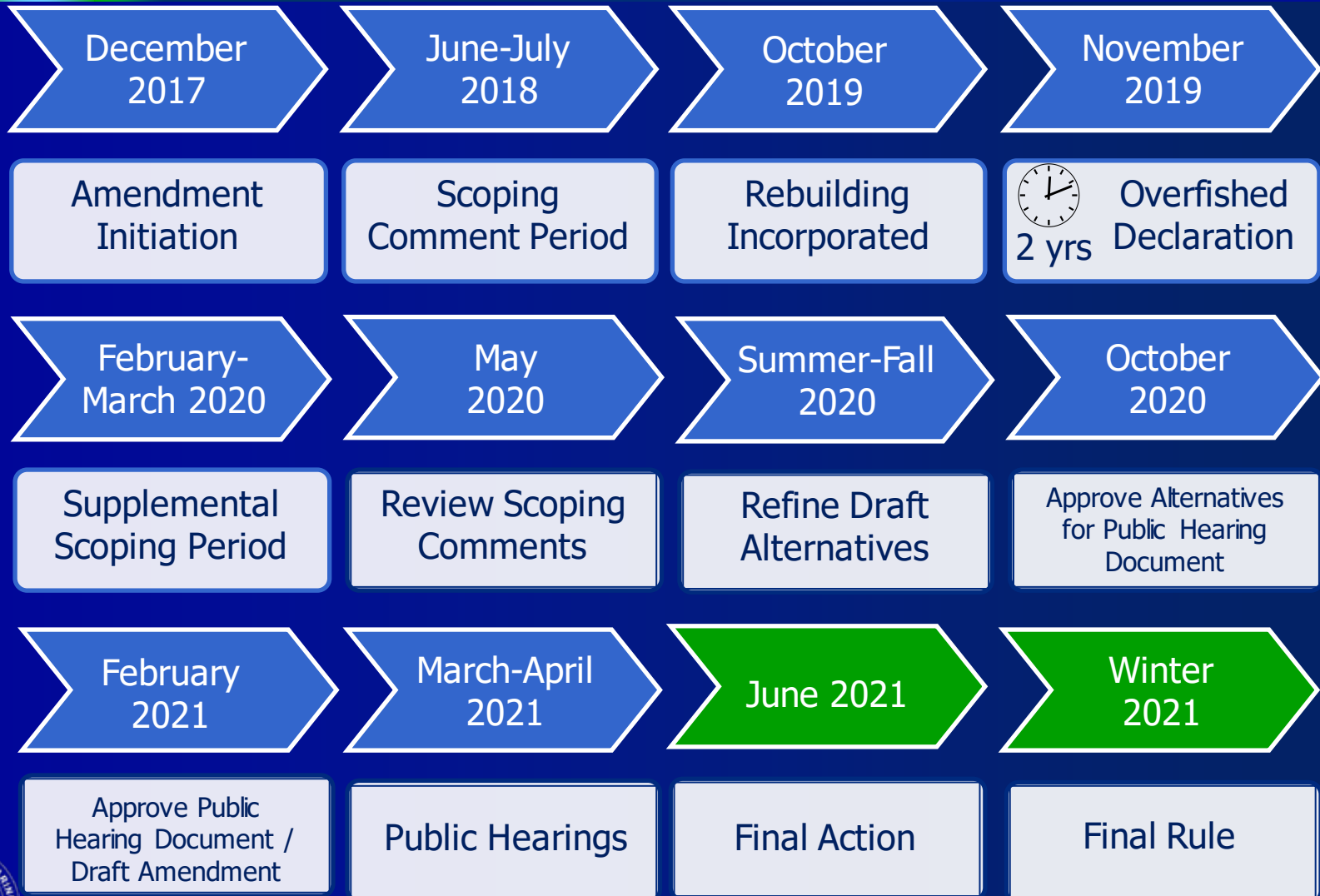
Joint Council and Board Meeting  
June 8, 2021

# Meeting Overview

- Recap of amendment alternatives
- Review public comments
- Review Advisory Panel comments
- Review FMAT discussion and recommendations
- Review Council staff recommendations
- Consider final action



# Timeline



# What are the management issues under consideration?

- Fishery management plan goals and objectives
- Commercial/recreational allocation
- Commercial allocations to the states
- Rebuilding plan
- Sector quota transfer
- Management uncertainty
- *De minimis*



# Public Comments

- 5 public hearings (ME-RI, CT-NY, NJ, DE-VA, NC-FL)
  - Attended by 134 individuals
- Summary of written and/or in-person comments by primary affiliation:

Sector	Individuals	Organizations	Percent of Total
Recreational	333	13	92%
Commercial	14	4	5%
Unknown/not specified	10		3%
Other	2	1	<1%
Multiple	1		<1%



# Current FMP Goals and Objectives

**Goal:** Conserve the bluefish resource along the Atlantic coast.

- **Objective 1:** Increase understanding of the stock and of the fishery.
- **Objective 2:** Provide the highest availability of bluefish to U.S. fishermen while maintaining, within limits, traditional uses of bluefish.
- **Objective 3:** Provide for cooperation among the coastal states, the various regional marine fishery management councils, and federal agencies involved along the coast to enhance the management of bluefish throughout its range.
- **Objective 4:** Prevent recruitment overfishing.
- **Objective 5:** Reduce the waste in both the commercial and recreational fisheries.



# Proposed FMP Goals and Objectives

**Goal 1** Conserve the bluefish resource through stakeholder engagement to maintain sustainable recreational fishing and commercial harvest.

- **Objective 1.1.** Achieve and maintain a sustainable spawning stock biomass and rate of fishing mortality.
- **Objective 1.2.** Promote practices that reduce discard mortality within the recreational and commercial fishery.
- **Objective 1.3.** Maintain effective coordination between the National Marine Fisheries Service, Council, Commission, and member states by promoting compliance and to support the development and implementation of management measures.
- **Objective 1.4.** Promote compliance and effective enforcement of regulations.
- **Objective 1.5.** Promote science, monitoring, and data collection that support and enhance effective ecosystem-based management of the bluefish resource.



# Proposed FMP Goals and Objectives

**Goal 2** Provide fair and equitable access to the fishery across all user groups throughout the management unit.

- **Objective 2.1** Ensure the implementation of management measures provides fair and equitable access to the resource across all groups along the coast.
- **Objective 2.2** Consider the economic and social needs and priorities of all groups that access the bluefish resource in the development of new management measures.
- **Objective 2.3** Maintain effective coordination with stakeholder groups to ensure optimization of economic and social benefits.





# Public Comments: FMP Goals and Objectives

- Manage fishery based on optimum yield rather than maximum sustainable yield
  - Catch and release aspect of the recreational fishery
  - Economic benefit of fish left in water
  - Manage for abundance
- Change “discard mortality” to release mortality
- Define “fair and equitable access”
- Define user groups



# Public Comments: FMP Goals and Objectives

- Better accountability needed for both sectors
- Management stability
- Environmental stressors should be addressed
  - Sand mining and beach replenishment has destroyed habitat
- Access to users along coast doesn't consider inland consumers



# AP Comments: FMP Goals and Objectives

- One AP member was concerned about public comments concerning managing only for abundance and not maximum sustainable harvest
- Emphasize the need for ecosystem-based management
- Fair and equitable access should mean sector separation for the for-hire sector



# FMAT Recommended Revisions

**Goal 1** Conserve the bluefish resource through stakeholder engagement to maintain sustainable recreational fishing and commercial harvest.

- **Objective 1.1.** Achieve and maintain a sustainable spawning stock biomass and rate of fishing mortality.
- **Objective 1.2.** Promote practices that reduce discard **release** mortality within the recreational and commercial fishery.
- **Objective 1.3.** Maintain effective coordination between the National Marine Fisheries Service, Council, Commission, and member states by promoting compliance and to support the development and implementation of management measures.
- **Objective 1.4.** Promote compliance and effective enforcement of regulations.
- **Objective 1.5.** Promote science, monitoring, and data collection that support and enhance effective ecosystem-based management of the bluefish resource.



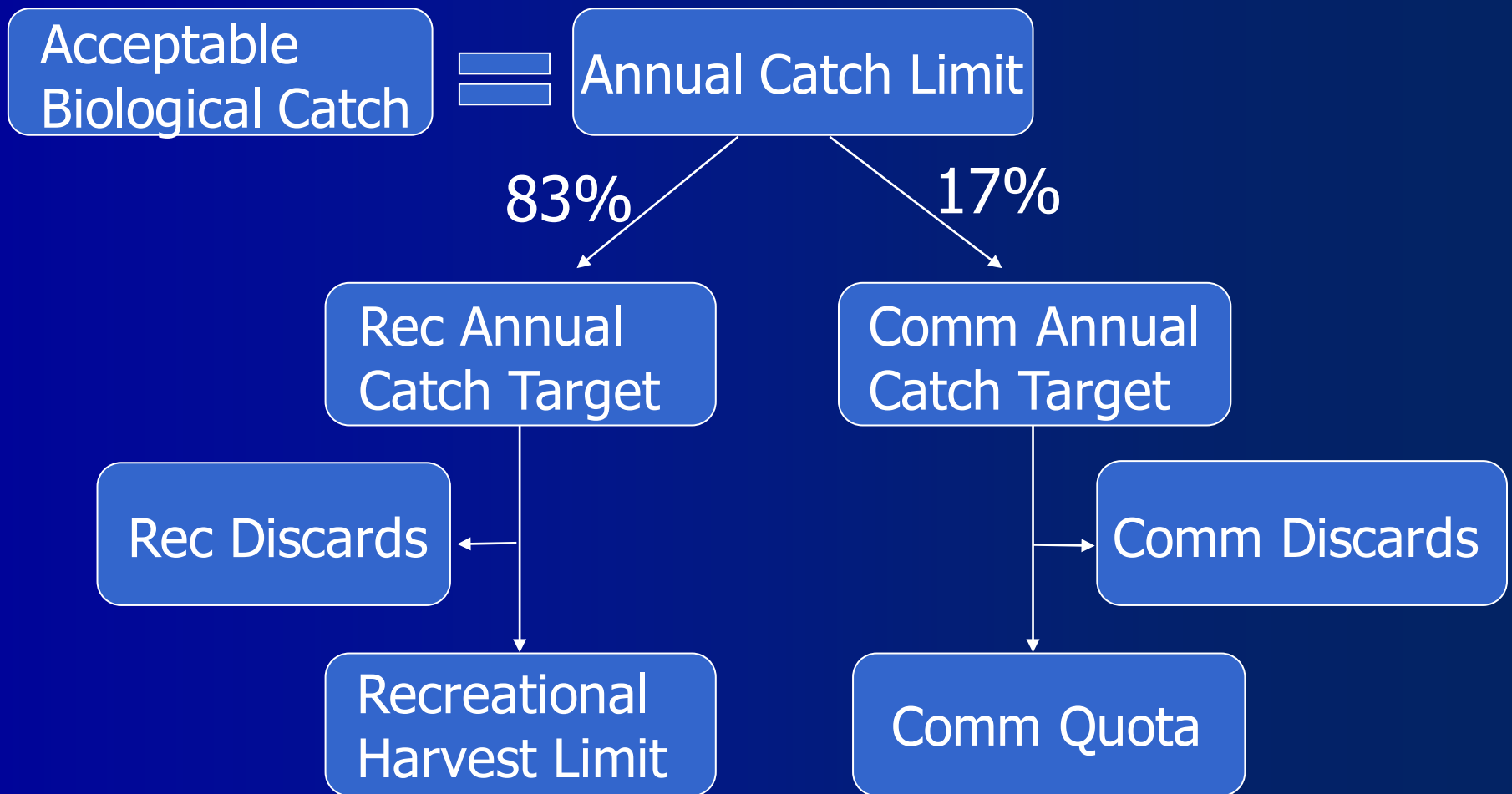
# FMAT Recommended Revisions

**Goal 2** Provide fair and equitable access to the fishery across all user groups throughout the management unit.

- **Objective 2.1** Ensure the implementation of management measures provides fair and equitable access to the resource across all **user** groups ~~along the coast~~ **within the management unit.**
- **Objective 2.2** Consider the economic and social needs and priorities of all groups that access the bluefish resource in the development of new management measures.
- **Objective 2.3** Maintain effective coordination with stakeholder groups to ensure optimization of economic and social benefits.



# Commercial/Recreational Sector Allocation Overview



# Commercial/Recreational Sector Allocation Alternatives

Allocation Percentages	
Alternative	Basis
<b>2a-1: 83% recreational, 17% commercial</b>	No action/status quo (1981-1989 landings data using uncalibrated MRIP estimates)
<b>2a-2: 89% recreational, 11% commercial</b>	Multiple approaches: 2014-2018 and 2009-2018 catch data
<b>2a-3: 87% recreational, 13% commercial</b>	1999-2018 catch data
<b>2a-4: 86% recreational, 14% commercial</b>	Multiple approaches: 1981-2018 catch data; 2014-2018 and 2009-2018 landings data
<b>2a-5: 84% recreational, 16% commercial</b>	Multiple approaches: 1981-2018 and 1999-2018 landings data

Alternative	2a-1	2a-2	2a-3	2a-4	2a-5
<b>Proposed Recreational Allocation</b>	<b>83%</b>	<b>89%</b>	<b>87%</b>	<b>86%</b>	<b>84%</b>
<b>% Change from Status Quo</b>	<b>0%</b>	<b>+7%</b>	<b>+5%</b>	<b>+4%</b>	<b>+1%</b>
<b>Proposed Commercial Allocation</b>	<b>17%</b>	<b>11%</b>	<b>13%</b>	<b>14%</b>	<b>16%</b>
<b>% Change from Status Quo</b>	<b>0%</b>	<b>-35%</b>	<b>-24%</b>	<b>-18%</b>	<b>-6%</b>



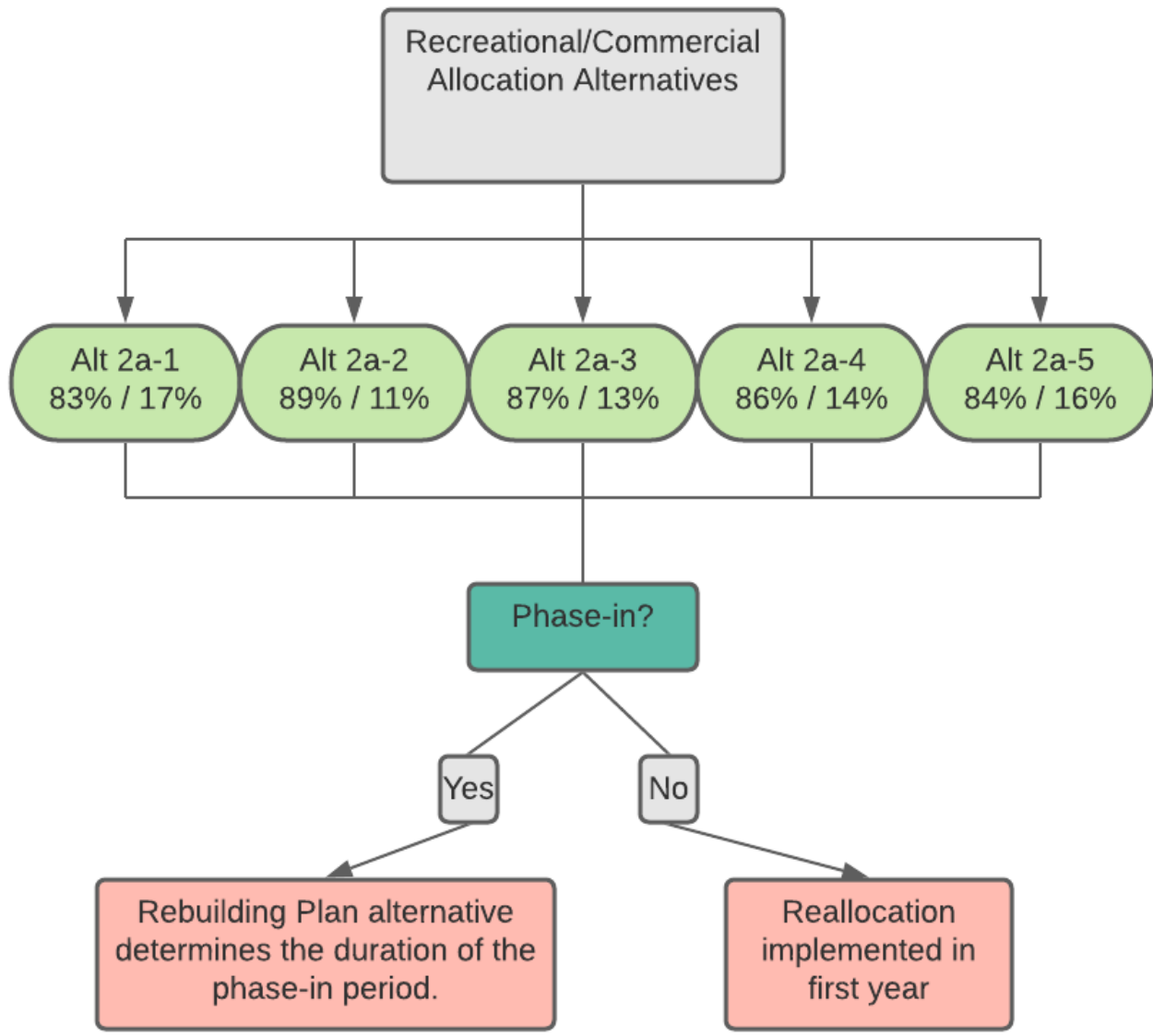
# Allocation Change Phase-in Alternatives and Impacts

<b>Phase-in Alternatives</b>
<b>2b-1:</b> No phase-in
<b>2b-2:</b> Allocation change spread evenly over the same duration as the selected rebuilding plan

<b>Bluefish Allocation Change Phase-In</b>			
Current allocation (2a-1): 83% recreational, 17% commercial			
<b>Allocation Alternatives</b>	<b>4-year phase-in</b>	<b>5-year phase-in</b>	<b>7-year phase-in</b>
<b>2a-2: 89% Rec., 11% Comm.</b>	<b>1.5% change per year</b>	<b>1.2% change per year</b>	<b>0.86% change per year</b>
<b>2a-3: 87% Rec., 13% Comm.</b>	<b>1% change per year</b>	<b>0.8% change per year</b>	<b>0.57% change per year</b>
<b>2a-4: 86% Rec., 14% Comm.</b>	<b>0.75% change per year</b>	<b>0.6% change per year</b>	<b>0.43% change per year</b>
<b>2a-5: 84% Rec., 16% Comm.</b>	<b>0.25% change per year</b>	<b>0.2% change per year</b>	<b>0.14% change per year</b>







# Public Comments: Commercial/Recreational Allocation

Commercial/Recreational Allocation		Form Letter	Individuals	Organizations	Grand Total
2a-1	<b>83% Rec, 17% Comm (Status quo)</b>		16	4	20
2a-2	<b>89% Rec, 11% Comm</b>		12	4	16
2a-3	<b>87% Rec, 13% Comm</b>	277	3	7	287
2a-4	<b>86% Rec, 14% Comm</b>		8	1	9
2a-5	<b>84% Rec, 16% Comm</b>		3	1	4
2b-1	<b>No Phase-in</b>	277	9	10	296
2b-2	<b>Phase-in</b>		2	3	5



# AP Comments: Commercial/Recreational Allocations

- Ensure that the commercial sector has sufficient allocation to allow the food producing community to continue operating
- One AP member did not support a phase-in
- One AP member preferred using catch data

<b>2a-1</b>	<b>83% Rec, 17% Comm (Status quo)</b>	<b>1</b>
<b>2a-2</b>	<b>89% Rec, 11% Comm</b>	<b>1</b>
<b>2a-3</b>	<b>87% Rec, 13% Comm</b>	<b>2</b>
<b>2a-4</b>	<b>86% Rec, 14% Comm</b>	<b>0</b>
<b>2a-5</b>	<b>84% Rec, 16% Comm</b>	<b>1</b>



# FMAT Recommendations

- The FMP allocates the ABC (catch) between two sectors. Catch data should be used as the basis for developing the allocation percentage.
  - Alts 2a-1 and 2a-5 are derived from landings data, FMAT recommends consideration of alts 2a-2, 2a-3, 2a-4
- FMAT recommends no phase-in (2b-1)



# Commercial Allocations to the States Alternatives

Landings-Based Allocation Alternatives				
State	3a-1	3a-2	3a-3	3a-4
	No action/ Status quo (1981-1989)	5 year (2014-2018)	10 year (2009-2018)	1/2 '81-'89 1/2 '09-'18
ME	0.67%	0.00%	0.01%	0.49%
NH	0.41%	0.03%	0.12%	0.33%
MA	6.72%	10.64%	10.16%	7.66%
RI	6.81%	11.81%	9.64%	7.59%
CT	1.27%	1.18%	1.00%	1.19%
NY	10.39%	20.31%	19.94%	13.01%
NJ	14.82%	11.23%	13.94%	14.57%
DE	1.88%	0.58%	0.40%	1.47%
MD	3.00%	1.50%	1.84%	2.68%
VA	11.88%	4.62%	5.85%	10.26%
NC	32.06%	32.06%	32.38%	32.13%
SC	0.04%	0.00%	0.00%	0.03%
GA	0.01%	0.00%	0.00%	0.01%
FL	10.06%	6.07%	4.75%	8.59%
<b>Total</b>	<b>100.02%</b>	<b>100.01%</b>	<b>100.03%</b>	<b>100.00%</b>



# Commercial Allocations to the States

## Impacts

Allocation Alternatives Based on Landings Data							
State	3a-1	3a-2		3a-3		3a-4	
	Status quo (1981-1989)	5 year (2014-2018)		10 year (2009-2018)		1/2 '81-'89	1/2 '09-'18
ME	0.67%	0.00%	-100%	0.01%	-99%	0.49%	-27%
NH	0.41%	0.03%	-93%	0.12%	-71%	0.33%	-20%
MA	6.72%	10.64%	58%	10.16%	51%	7.66%	14%
RI	6.81%	11.81%	73%	9.64%	42%	7.59%	11%
CT	1.27%	1.18%	-7%	1.00%	-21%	1.19%	-6%
NY	10.39%	20.31%	95%	19.94%	92%	13.01%	25%
NJ	14.82%	11.23%	-24%	13.94%	-6%	14.57%	-2%
DE	1.88%	0.58%	-69%	0.40%	-79%	1.47%	-22%
MD	3.00%	1.50%	-50%	1.84%	-39%	2.68%	-11%
VA	11.88%	4.62%	-61%	5.85%	-51%	10.26%	-14%
NC	32.06%	32.06%	0%	32.38%	1%	32.13%	0%
SC	0.04%	0.00%	-100%	0.00%	-100%	0.03%	-25%
GA	0.01%	0.00%	-100%	0.00%	-100%	0.01%	0%
FL	10.06%	6.07%	-40%	4.75%	-53%	8.59%	-15%
<b>Total</b>	<b>100.02%</b>	<b>100.01%</b>		<b>100.03%</b>		<b>100.00%</b>	



# Commercial Allocations to the States

## Phase-In Alternatives

### Phase-in Alternatives

**3b-1:** No phase-in

**3b-2:** Allocation change spread evenly over the same duration as the selected rebuilding plan

		5 year (2014-2018) See 3a-2			10 year (2009-2018) See 3a-3			1/2 '81-'89 1/2 '09-'18 See 3a-4		
State	Current Allocations	4-year	5-year	7-year	4-year	5-year	7-year	4-year	5-year	7-year
ME	0.67%	-0.17%	-0.13%	-0.10%	-0.17%	-0.13%	-0.09%	-0.05%	-0.04%	-0.03%
NH	0.41%	-0.10%	-0.08%	-0.05%	-0.07%	-0.06%	-0.04%	-0.02%	-0.02%	-0.01%
MA	6.72%	0.98%	0.78%	0.56%	0.86%	0.69%	0.49%	0.23%	0.19%	0.13%
RI	6.81%	1.25%	1.00%	0.71%	0.71%	0.57%	0.40%	0.19%	0.16%	0.11%
CT	1.27%	-0.02%	-0.02%	-0.01%	-0.07%	-0.05%	-0.04%	-0.02%	-0.02%	-0.01%
NY	10.39%	2.48%	1.98%	1.42%	2.39%	1.91%	1.36%	0.65%	0.52%	0.37%
NJ	14.82%	-0.90%	-0.72%	-0.51%	-0.22%	-0.18%	-0.13%	-0.06%	-0.05%	-0.04%
DE	1.88%	-0.33%	-0.26%	-0.19%	-0.37%	-0.30%	-0.21%	-0.10%	-0.08%	-0.06%
MD	3.00%	-0.38%	-0.30%	-0.21%	-0.29%	-0.23%	-0.17%	-0.08%	-0.06%	-0.05%
VA	11.88%	-1.82%	-1.45%	-1.04%	-1.51%	-1.21%	-0.86%	-0.41%	-0.32%	-0.23%
NC	32.06%	0.00%	0.00%	0.00%	0.08%	0.06%	0.05%	0.02%	0.01%	0.01%
SC	0.04%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	0.00%	0.00%	0.00%
GA	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
FL	10.06%	-1.00%	-0.80%	-0.57%	-1.33%	-1.06%	-0.76%	-0.37%	-0.29%	-0.21%

# Commercial Allocations to the States

## Commercial Quota Trigger Alternatives

- Trigger approach has three components
  - State allocations below the trigger
  - State allocations above a trigger
  - A trigger value that the commercial quota is compared to
    - Based on historical commercial quotas



# Commercial Allocations to the States

## Commercial Quota Trigger Alternatives

- Quota below the trigger value allocated based on allocations selected from alternative set 3a
- Quota above the trigger value allocated based on a tiered system.

<b>Range of Baseline Quota Tiers</b>	<b>Associated Additional Quota Allocations</b>
<=1%	0.10%
>1-5%	3.00%
>5-10%	7.50%
>10%	Remainder

# Commercial Allocations to the States

## Commercial Quota Trigger Alternatives

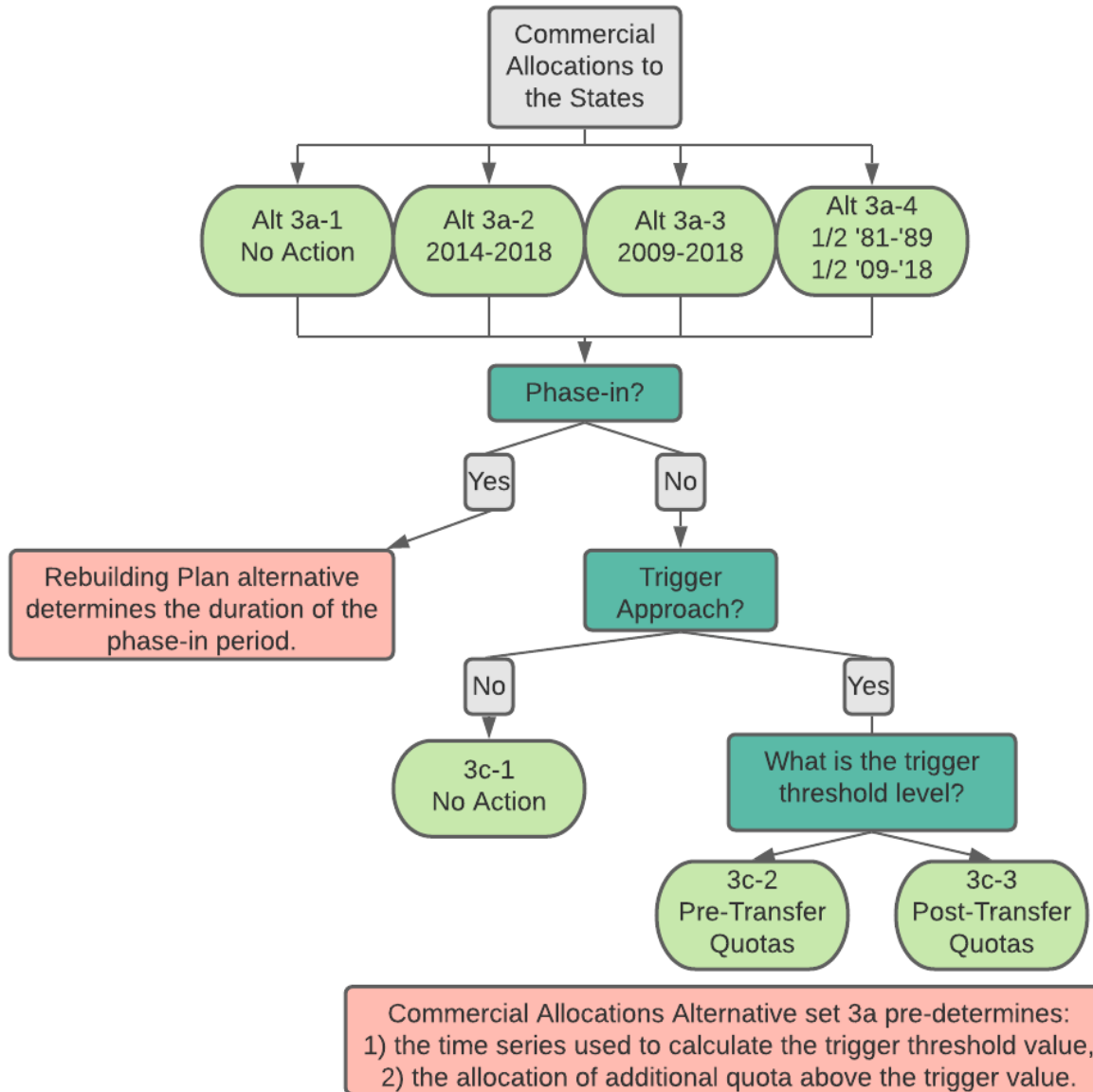
Landings-Based Allocation Alternatives								
State	3a-1 Status quo baseline allocations with trigger		3a-2 5 year		3a-3 10 year		3a-4 1/2 '81-'89 & 1/2 '09- '18	
	Allocation	Allocation	Allocation	Allocation	Allocation	Allocation	Allocation	Allocation
	under trigger	above trigger	under trigger	above trigger	under trigger	above trigger	under trigger	above trigger
<b>ME</b>	0.67%	0.10%	0.00%	0.10%	0.01%	0.10%	0.49%	0.10%
<b>NH</b>	0.41%	0.10%	0.03%	0.10%	0.12%	0.10%	0.33%	0.10%
<b>MA</b>	6.72%	7.50%	10.64%	16.60%	10.16%	19.60%	7.66%	7.50%
<b>RI</b>	6.81%	7.50%	11.81%	16.60%	9.64%	7.50%	7.59%	7.50%
<b>CT</b>	1.27%	3.00%	1.18%	3.00%	1.00%	0.10%	1.19%	3.00%
<b>NY</b>	10.39%	15.12%	20.31%	16.60%	19.94%	19.60%	13.01%	17.03%
<b>NJ</b>	14.82%	15.12%	11.23%	16.60%	13.94%	19.60%	14.57%	17.03%
<b>DE</b>	1.88%	3.00%	0.58%	0.10%	0.40%	0.10%	1.47%	3.00%
<b>MD</b>	3.00%	3.00%	1.50%	3.00%	1.84%	3.00%	2.68%	3.00%
<b>VA</b>	11.88%	15.12%	4.62%	3.00%	5.85%	7.50%	10.26%	17.03%
<b>NC</b>	32.06%	15.12%	32.06%	16.60%	32.38%	19.60%	32.13%	17.03%
<b>SC</b>	0.04%	0.10%	0.00%	0.10%	0.00%	0.10%	0.03%	0.10%
<b>GA</b>	0.01%	0.10%	0.00%	0.10%	0.00%	0.10%	0.01%	0.10%
<b>FL</b>	10.06%	15.12%	6.07%	7.50%	4.75%	3.00%	8.59%	7.50%
<b>Total</b>	<b>100.02%</b>	100%	<b>100.01%</b>	100%	<b>100.03%</b>	100%	<b>100.00%</b>	100%

# Commercial Allocations to the States

## Commercial Quota Trigger Alternatives

Commercial Quota Time Series	No Trigger Alternative: 3c-1	Pre-Transfer Alternative: 3c-2	Post Transfer Alternative: 3c-3
No Action/Status quo [3a-1]	No trigger approach implemented	N/A	N/A
5-year (2014-2018) [3a-2]		3.67 M lbs	6.67 M lbs
10-year (2009-2018) [3a-3]		4.31 M lbs	8.21 M lbs
½ 1981-1989 and ½ 2009-2018 [3a-4]		4.31 M lbs*	8.21 M lbs*

\*No commercial quotas existed before the implementation of Amendment 1 in 2000



# Commercial Allocations to the States

## Minimum Default Allocation Alternatives

Minimum Default Allocation Alternatives	
<b>3d-1</b>	No Action/Status quo: No Minimum Default Allocation
<b>3d-2</b>	0.10% Minimum Default Allocation
<b>3d-3</b>	0.25% Minimum Default Allocation

3d-2 0.10% Minimum Default Allocation				
State	1981-1989	5-year 2014-2018	10-year 2009-2018	1/2 '81-'89 1/2 '09-'18
ME	0.76%	0.10%	0.11%	0.58%
NH	0.50%	0.13%	0.22%	0.42%
MA	6.73%	10.59%	10.12%	7.65%
RI	6.81%	11.74%	9.61%	7.58%
CT	1.35%	1.26%	1.09%	1.28%
NY	10.34%	20.12%	19.76%	12.93%
NJ	14.71%	11.17%	13.85%	14.46%
DE	1.95%	0.67%	0.49%	1.55%
MD	3.06%	1.57%	1.92%	2.75%
VA	11.81%	4.65%	5.87%	10.22%
NC	31.71%	31.71%	32.03%	31.78%
SC	0.14%	0.10%	0.10%	0.13%
GA	0.11%	0.10%	0.10%	0.11%
FL	10.02%	6.08%	4.78%	8.57%

3d-3 0.25% Minimum Default Allocation				
State	1981-1989	5-year 2014-2018	10-year 2009-2018	1/2 '81-'89 1/2 '09-'18
ME	0.90%	0.25%	0.26%	0.72%
NH	0.65%	0.28%	0.36%	0.56%
MA	6.73%	10.52%	10.05%	7.64%
RI	6.82%	11.65%	9.56%	7.57%
CT	1.48%	1.39%	1.22%	1.40%
NY	10.28%	19.85%	19.49%	12.80%
NJ	14.55%	11.09%	13.70%	14.31%
DE	2.06%	0.81%	0.64%	1.67%
MD	3.15%	1.69%	2.03%	2.84%
VA	11.71%	4.71%	5.89%	10.16%
NC	31.19%	31.19%	31.50%	31.25%
SC	0.29%	0.25%	0.25%	0.28%
GA	0.26%	0.25%	0.25%	0.26%
FL	9.96%	6.10%	4.83%	8.54%



# Public Comments: Commercial Allocations to the States

Commercial Allocations to the States		Form Letter	Individuals	Organizations	Grand Total
3a-1	Status quo		8	1	9
3a-2	5 year		8	3	11
3a-3	10 year		8	2	10
3a-4	½ 1981-1989 and ½ 2009-2018		6		6
3b-1	No Phase-in		5	1	6
3b-2	Phase-in		5	3	8
3c-1	No Trigger		7	2	9
3c-2	Pre-Transfer Trigger		1		1
3c-3	Post Transfer Trigger				
3d-1	No Minimum Default Allocation		3	2	5
3d-2	0.10% - Minimum Default Allocation		4	1	5
3d-3	0.25% - Minimum Default Allocation		3	1	4

# AP Comments: Commercial Allocations to the States

- 2 advisors supported status quo (3a-1)
- 1 advisor supported 3a-2
  - Most recent data should be used since allocations will be reviewed every 10 years
- 2 advisors supported 0.25% minimum default allocation
- 1 advisor supported no phase-in
- 1 advisor supported no trigger
- Ensure state-to-state transfers are still allowed



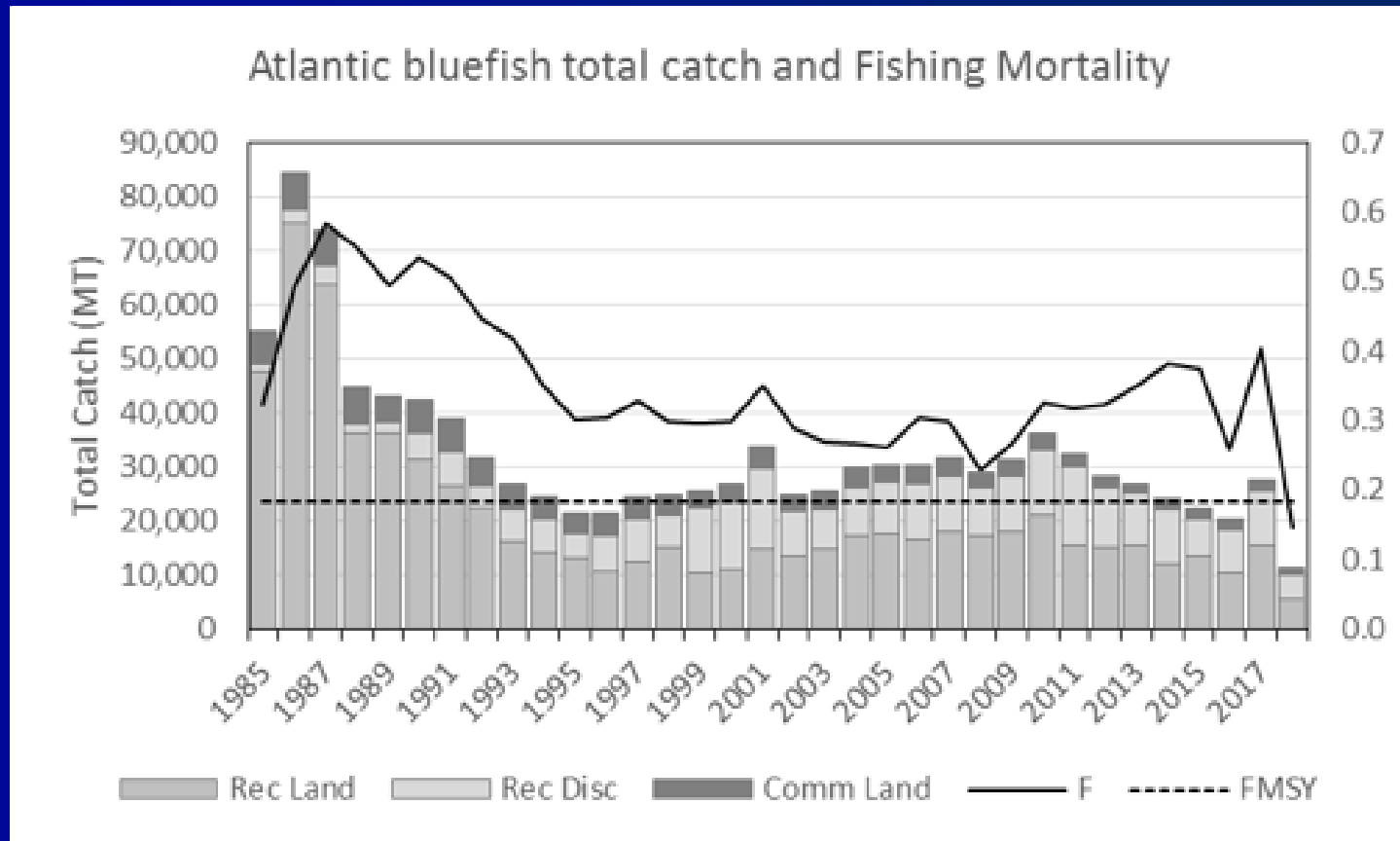
# FMAT Recommendations

- No recommendation on alternative sets 3a or 3b
- FMAT recommends alt 3c-1 no trigger
  - Public found the trigger approach to be overly complicated with limited perceived benefit
- FMAT recommends alt 3d-2, 0.10% minimum default allocations
  - 0.10% reduces regulatory discards, but isn't overly burdensome on other state's allocations





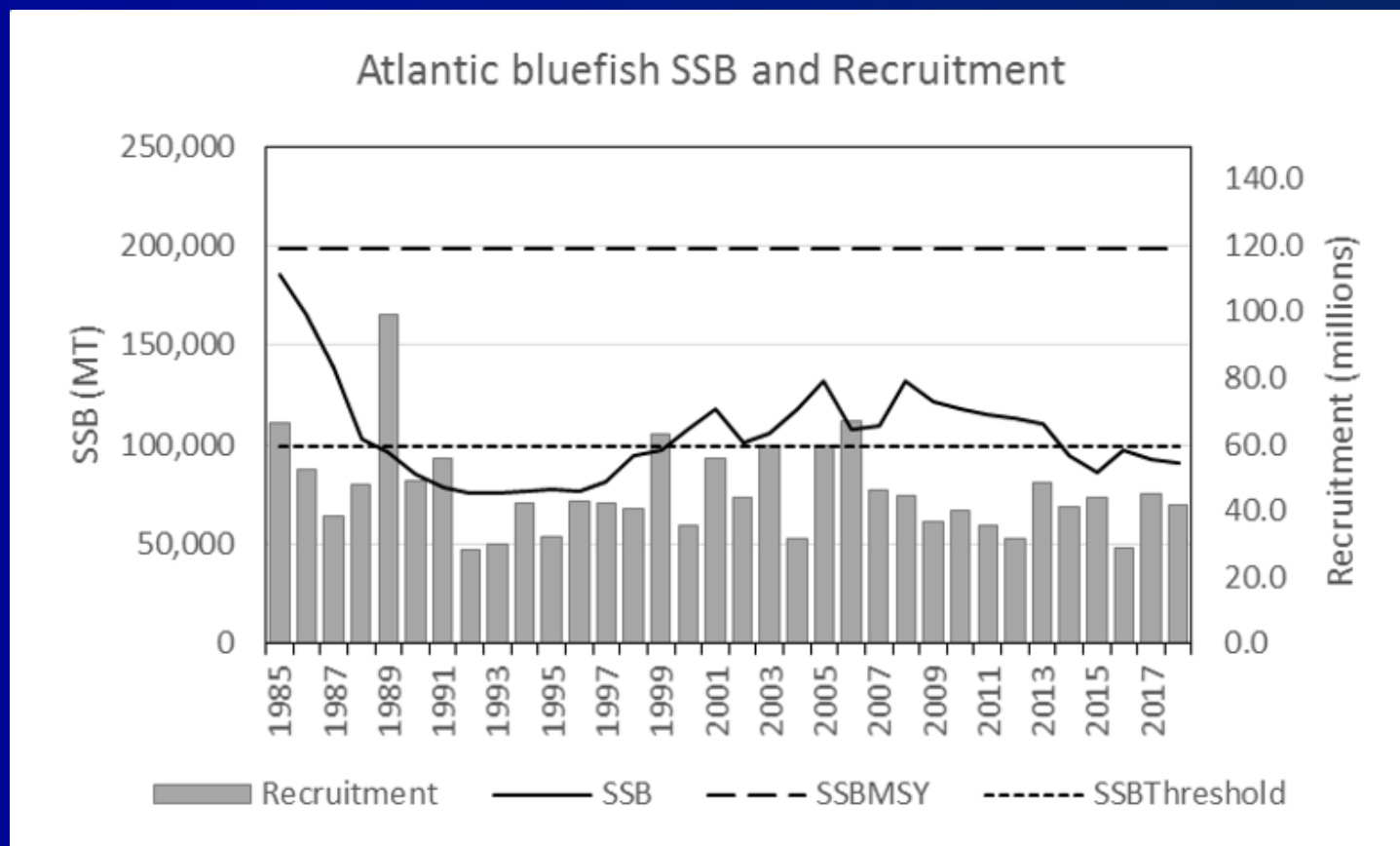
# Stock Status: Fishing Mortality



**Overfishing not occurring**

(2018  $F = 0.146$ ; below  $F_{MSY \text{ proxy}} = F_{35\%SPR} = 0.183$ )

# Stock Status: Overfished

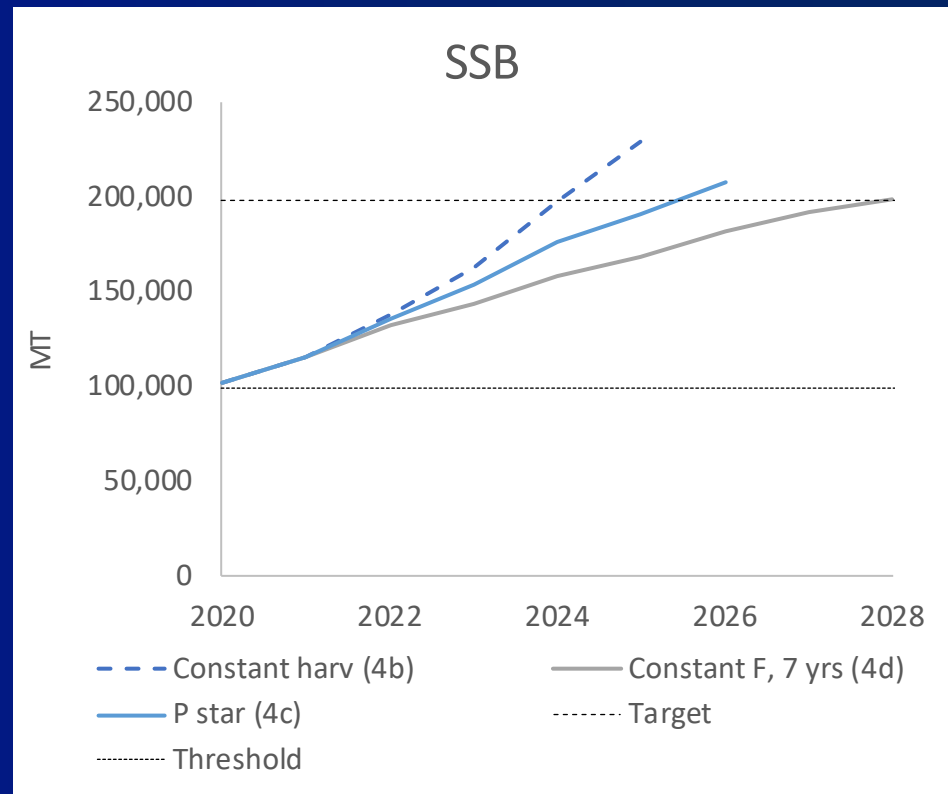
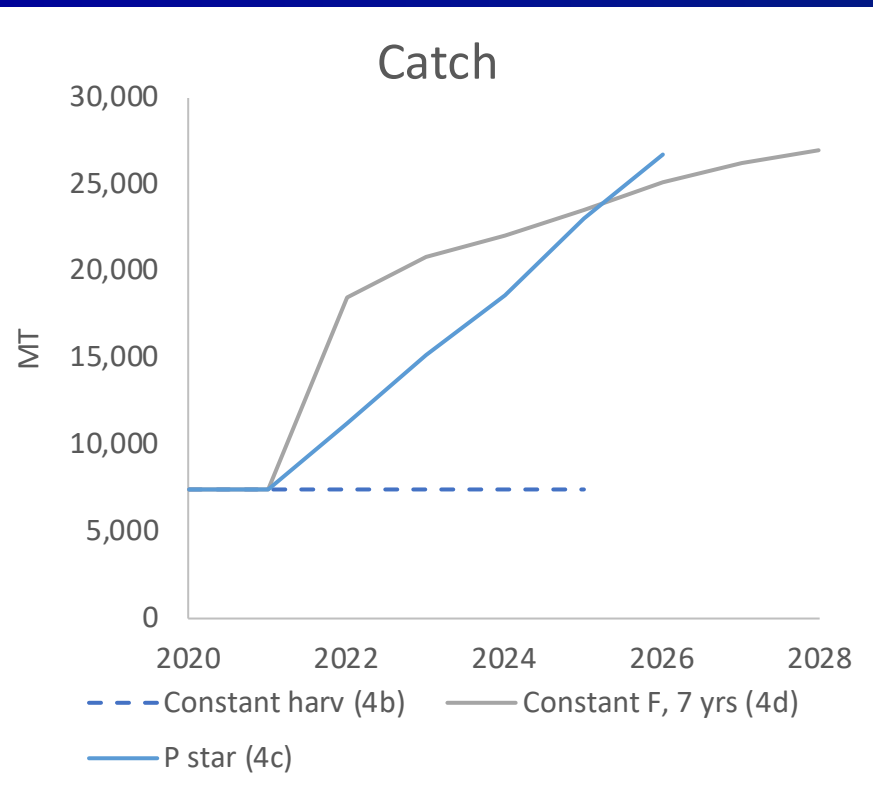


## Overfished

2018 SSB (91,041 mt)  $\approx$  8% below SSB<sub>Threshold</sub>

# Rebuilding Plan Alternatives

Alternative	Rebuilding Plan	Duration	Adjustment to Council Risk Policy
4a	No Action/ Status Quo	N/A	N/A
4b	Constant Harvest	4 years	No
4c	P* (Council Risk Policy)	5 years	N/A
4d	Constant Fishing Mortality	7 years	Yes



# Public Comments: Rebuilding Plan

Rebuilding Plan		Form Letter	Individuals	Organizations	Grand Total
4a	Status quo/No action		5		5
4b	Constant harvest		11	1	12
4c	P* approach		12	2	14
4d	Constant F	277	5	11	293
General comments on rebuilding	Stock is cyclical/environmentally driven/offshore; fishing mortality is not the problem		7	3	10
	Bluefish abundance is low/we do not see bluefish anymore/immediate and drastic action needed		20		20
	Bluefish stock is hurt by low abundance of forage fish		6	1	7

# AP Comments: Rebuilding Plan

- 3 advisors supported alt 4d 7-year constant fishing mortality plan
  - Offers the highest catch and the longest time period to successfully rebuild
- 1 advisor supported alt 4c P\* 5-year plan
- Focus on role of forage fish when considering rebuilding plans
- Two advisors shared concerns about unreliable MRIP estimates and the effect they have on the rebuilding plan



# FMAT Discussion

- Rebuilding plan should be as short as possible while:
  - considering the needs of the fishing communities that depend on the resource
  - accounting for the uncertainty inherent in the cyclical and environmentally driven nature of the stock.
- Alts 4c and 4d may be preferable because they project catches that increase steadily over the duration of the rebuilding plan



# FMAT Discussion

- Stock Assessment Scientist concerns:
  - Some components of the stock may not be accessible to the inshore fishery if offshore migrations are occurring
  - Currently no offshore surveys to verify these trends
  - Limited tagging studies assessing regional bluefish abundance and migration
  - Data may not be available to inform the model, which may impact projections and rebuilding progress



# Quota Transfers

Alternatives	Annual Quota Transfer Alternatives
<b>5a-1</b>	No Action/Status Quo
<b>5a-2</b>	Allow for optional bi-directional transfers through the annual specifications process with pre-defined guidelines and process. The transfer would consist of a portion of the total ABC in the form of a landings limit (i.e., commercial quota and RHL) transfer. Transfers would not occur if the stock is overfished or overfishing is occurring.

Alternatives	Transfer Cap
<b>5b-1</b>	No Action/Status Quo
<b>5b-2</b>	Up to 10% of the ABC





# Transfer Cap Alternatives

- 5b-1 maintains existing recreational to commercial sector transfer cap of 10.5 million pounds
  - Combination of alt 5a-2 and 5b-1 would only cap transfers from the recreational to the commercial sector
- 5b-2 implements a cap on transfers in either direction equal to 10% of the ABC



# Public Comment: Sector Transfers

Sector Transfers		Form Letter	Individuals	Organizations	Grand Total
<b>5a-1</b>	<b>No Action/Status quo</b>		12	3	15
<b>5a-2</b>	<b>Allow transfer both ways</b>	277	5	6	288
<b>5b-1</b>	<b>No Action/Status quo</b>		10	2	12
<b>5b-2</b>	<b>Sector transfer cap: 10%</b>	277	5	6	288
<b>General comments on transfers</b>	<b>Quota should not be transferred between sectors</b>		17	6	23



# AP Comments: Sector Transfers

- 1 advisor supported 5a-1 until recreational catch accounting can be done more accurately
- 3 advisors supported 5a-2
  - Transfer provisions are necessary to ensure *both* sectors support one another to avoid overages



# FMAT Recommendations

- FMAT offered no specific recommendation on the sector transfer process; determined it to be a policy decision for the Board and Council
- FMAT recommends alt 5b-2
  - Transfer cap that scales with biomass is preferable especially if the stock rebuilds to a much higher biomass level.



# Management Uncertainty

Alternatives	Management Uncertainty Alternatives
6a	No Action/Status Quo
6b	Post-Sector Split

- Alt 6b would modify how the Monitoring Committee, Board, and Council account for management uncertainty by allowing for a more targeted approach

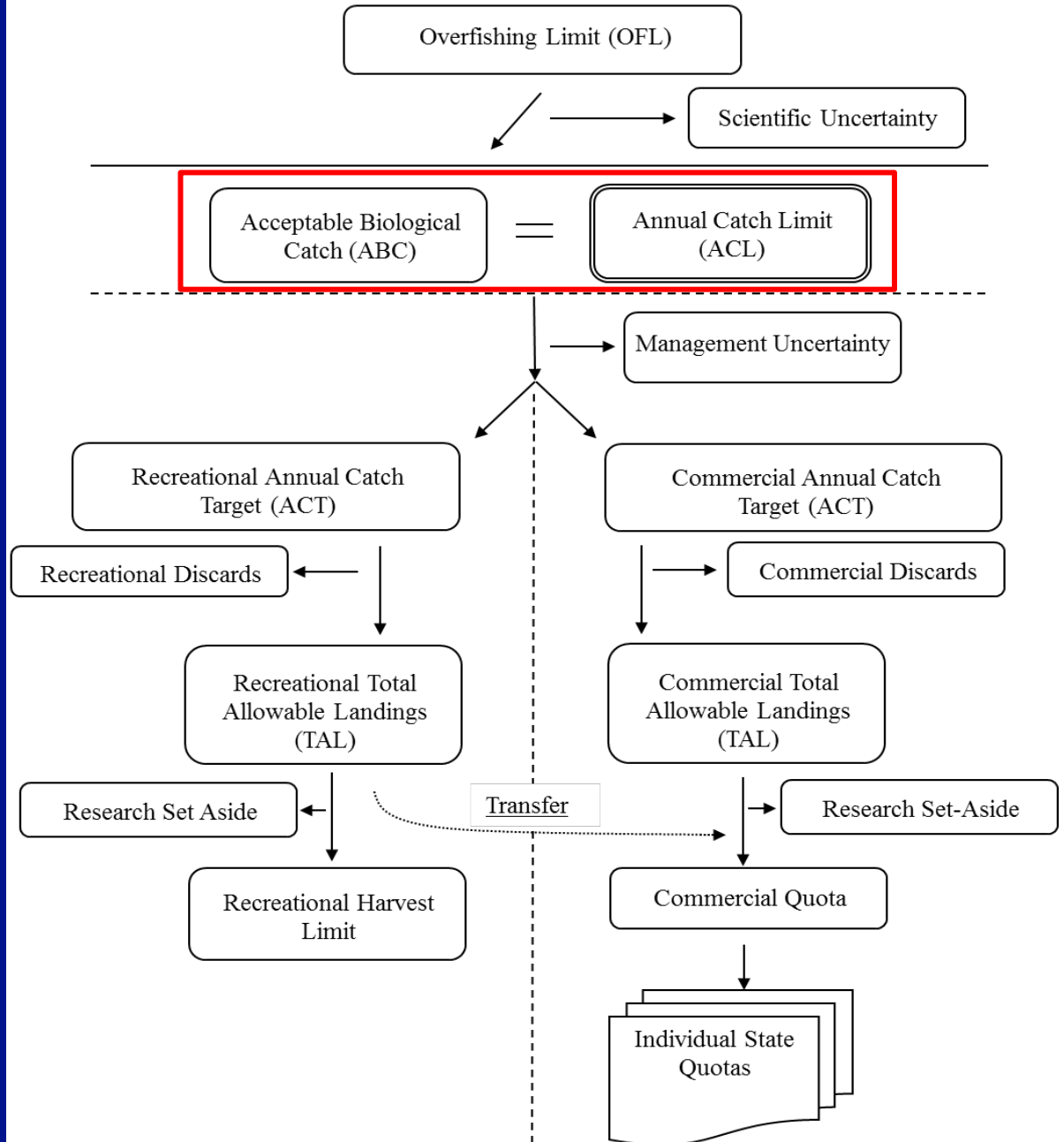


**Management  
Uncertainty**

**Sector Specific  
Management  
Uncertainty**

**Status Quo**

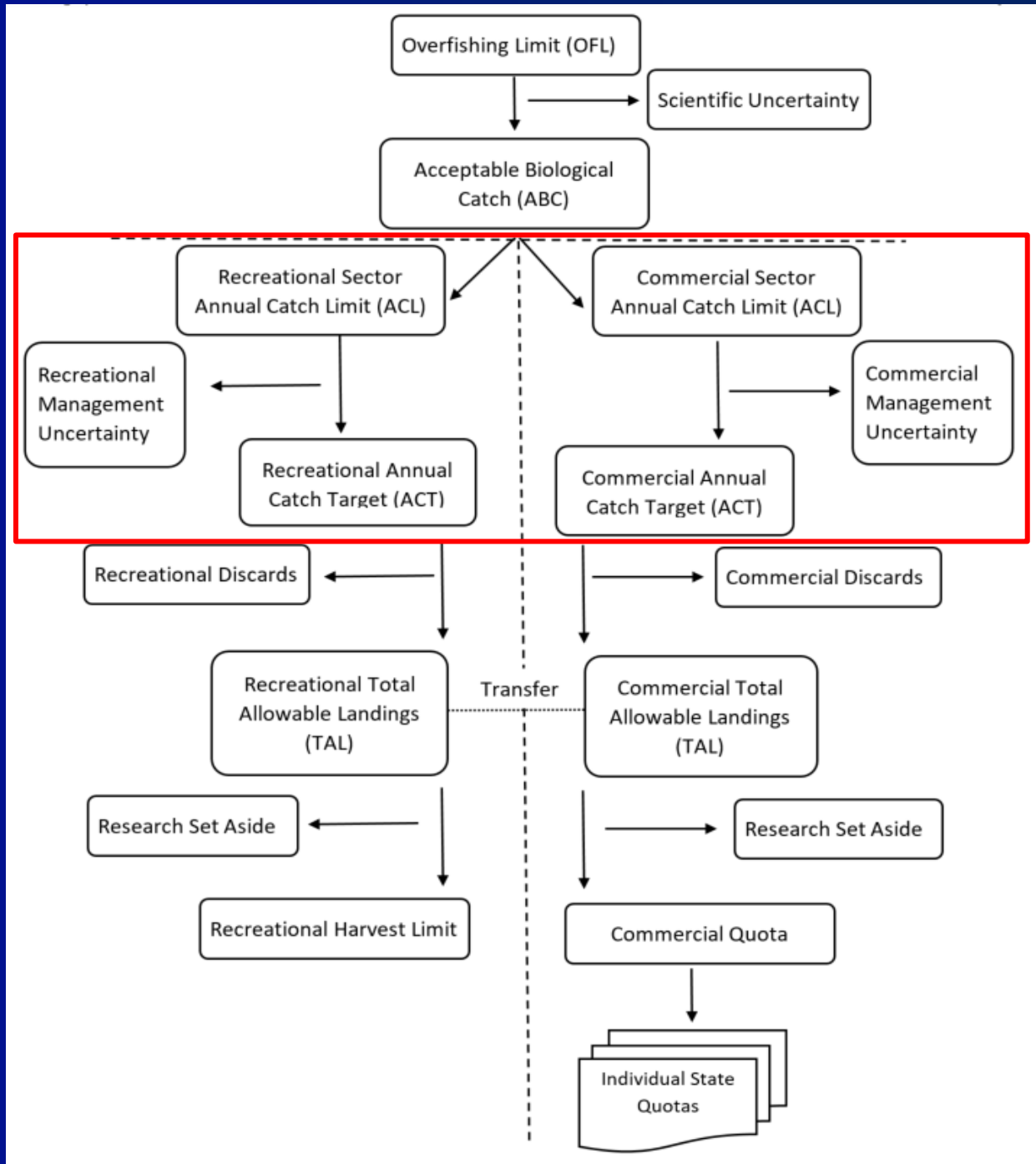
### Atlantic Bluefish Flowchart



# Management Uncertainty

# Sector Specific Management Uncertainty

# Post-Sector Split



# Public Comment: Management Uncertainty

Management Uncertainty		Form Letter	Individual	Organization	Grand Total
6a	No Action/Status quo	277	6	8	291
6b	Sector Specific (Post Sector Split)		19	5	24





# AP Comments: Management Uncertainty

- 2 advisors supported sector specific management uncertainty (alt 6b)
- 1 advisor thought management uncertainty should not only be applied as a reduction to the ACT, but potentially offer situations where the ACT can be increased



# FMAT Recommendations

- FMAT recommends sector specific management uncertainty (alt 6b)
  - Allows MC to be more precise when applying management uncertainty buffer
  - Application of management uncertainty is fairer and more equitable
  - Has received strong support from many different user groups, technical staff, and managers



# *De Minimis*

<b>Alternatives</b>	<b><i>De Minimis</i> Alternatives</b>
<b>7a</b>	No Action/Status Quo
<b>7b</b>	Recreational <i>De Minimis</i> – no management measures
<b>7c</b>	Recreational <i>De Minimis</i> – state-selected management measures
<b>7d</b>	Recreational <i>De Minimis</i> – rollover management measures
<b>7e</b>	Recreational <i>De Minimis</i> – 2020 management measures

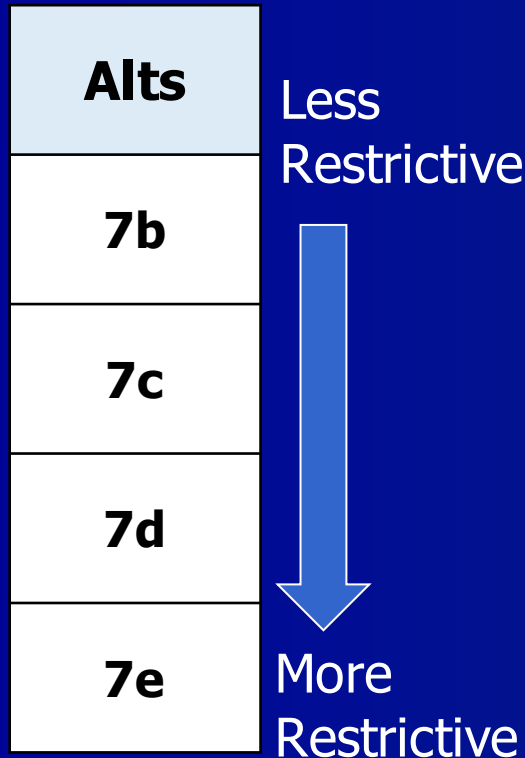


# *De Minimis* Alternatives

- All alternatives provide an exemption from fishery dependent monitoring
- Alternatives 7b-e
  - A state's 3-year average of combined rec and comm landings compared against 1% of coastwide landings. IF state landings < 1% = *De minimis* status granted
  - *De minimis* states always have the choice to implement coastwide measures if preferred



# *De Minimis* Alternatives



7b - Exempt from setting recreational measures

7c - Must keep measures of their choosing

7d - Recreational measures equal to what were in place when *de minimis* status was first requested

7e - Measures equal to 3/5 fish bag limit (private/for-hire)

# Public Comment: *De minimis*

De Minimis		Form Letter	Individual	Organization	Grand Total
7a	No Action/Status quo		12	2	14
7b	Recreational De Minimis – no management measures		2		2
7c	Recreational De Minimis – state-selected management measures		2	2	4
7d	Recreational De Minimis – rollover management measures		2		2
7e	Recreational De Minimis – 2020 management measures		4	1	5



# AP Comments: *De minimis*

- 1 advisor supported alt 7b
  - *De minimis* states catch so few fish, so we should be as unrestrictive as possible
- 1 advisor supported alt 7c
  - Allows states to think about their own management measures and what fits best for their situation



# FMAT Recommendations

- Economic/social benefits of liberal rec measures in *de minimis* states vs. potential shifts in effort from other states
- Board-only policy decision





# Public Comments: General Comments

General Comments	Form Letter	Individual	Organization	Grand Total
Management should account for the catch-and-release fishery (value of fish left in the water)		13	9	22
Recreational reporting and accountability need to be improved		7	3	10
Implement a minimum size limit		9		9
Strong concerns with MRIP data; unbelievable/unreliable		6	3	9
Lower the bag limit		6		6
Increase the bag limit		3		3
Cut the commercial quota		6		6
Increase the commercial quota		4		4
Address recreational discard issue		4		4



# Council Staff Memo

Alternative	Management Issue	Recommendation
<b>1: FMP Goals and Objectives</b>		
Current	Status quo	
Proposed	Proposed	FMAT and Council Staff
<b>2: Sector Allocations</b>		
2a-1	83% Rec, 17% Comm (Status quo) 1981-1989: Landings-Based	
2a-2	89% Rec, 11% Comm 2014-2018, 2009-2018: Catch-Based	
2a-3	87% Rec, 13% Comm 1999-2018: Catch-Based	Council Staff
2a-4	86% Rec, 14% Comm 1981-2018: Catch-Based, 2014-2018 and 2009-2018: Landings-Based	
2a-5	84% Rec, 16% Comm 1999-2018, 1981-2018: Landings-Based	
2b-1	No Phase-in	FMAT and Council Staff
2b-2	Phase-in over preferred rebuilding plan duration	



# Council Staff Memo

Alternative	Management Issue	Recommendation
<b>3: Commercial Allocations to the States</b>		
3a-1	Status quo 1981-1989 (Amend 1)	
3a-2	5 year 2014-2018: Landings-Based	
3a-3	10 year 2009-2018: Landings-Based	Council Staff
3a-4	1981-1989 (50%) and 2009-2018 (50%) Landings-Based	
3b-1	No Phase-in	Council Staff
3b-2	Phase-in over preferred rebuilding plan duration	
3c-1	No Trigger	FMAT and Council Staff
3c-2	Pre-Transfer Trigger	
3c-3	Post Transfer Trigger	
3d-1	No Minimum Default Allocation	
3d-2	0.10% - Minimum Default Allocation	FMAT and Council Staff
3d-3	0.25% - Minimum Default Allocation	

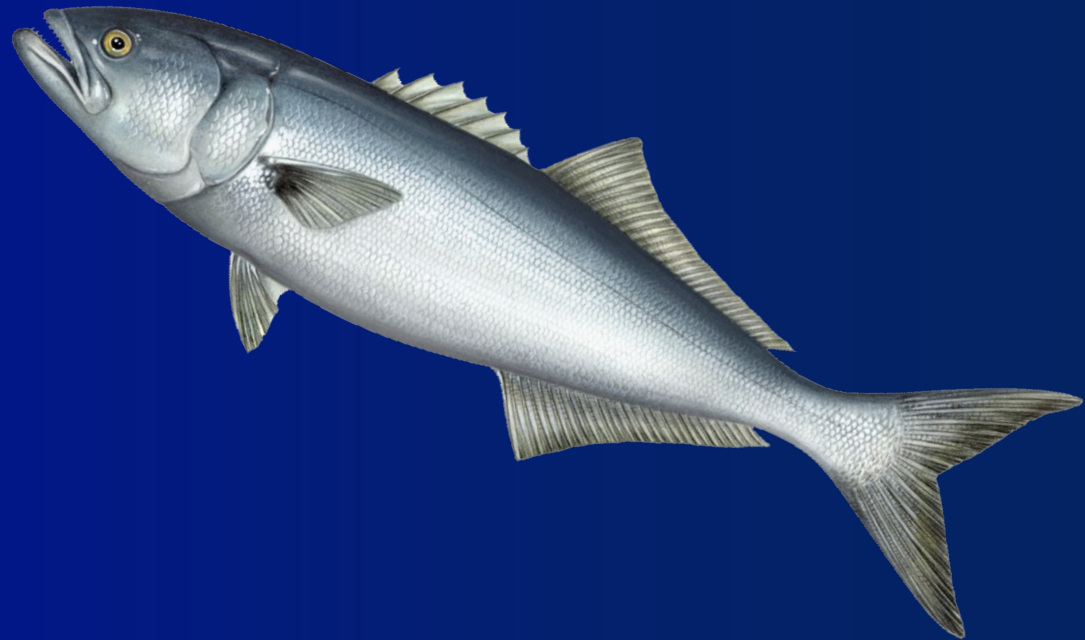


# Council Staff Memo

Alternative	Management Issue	Recommendation
<b>4: Rebuilding Plan</b>		
4a	No action/Status quo	
4b	Constant harvest: 4 years	
4c	P* approach: 5 years	Council Staff
4d	Constant F: 7 years	
<b>5: Sector Transfers</b>		
5a-1	No Action/Status quo	
5a-2	Bidirectional transfers	Council Staff
5b-1	No Action/Status quo	
5b-2	Sector transfer cap: up to 10% of ABC	FMAT and Council Staff
<b>6: Management Uncertainty</b>		
6a	No Action/Status quo	
6b	Post Sector-Split	FMAT and Council Staff



Questions?



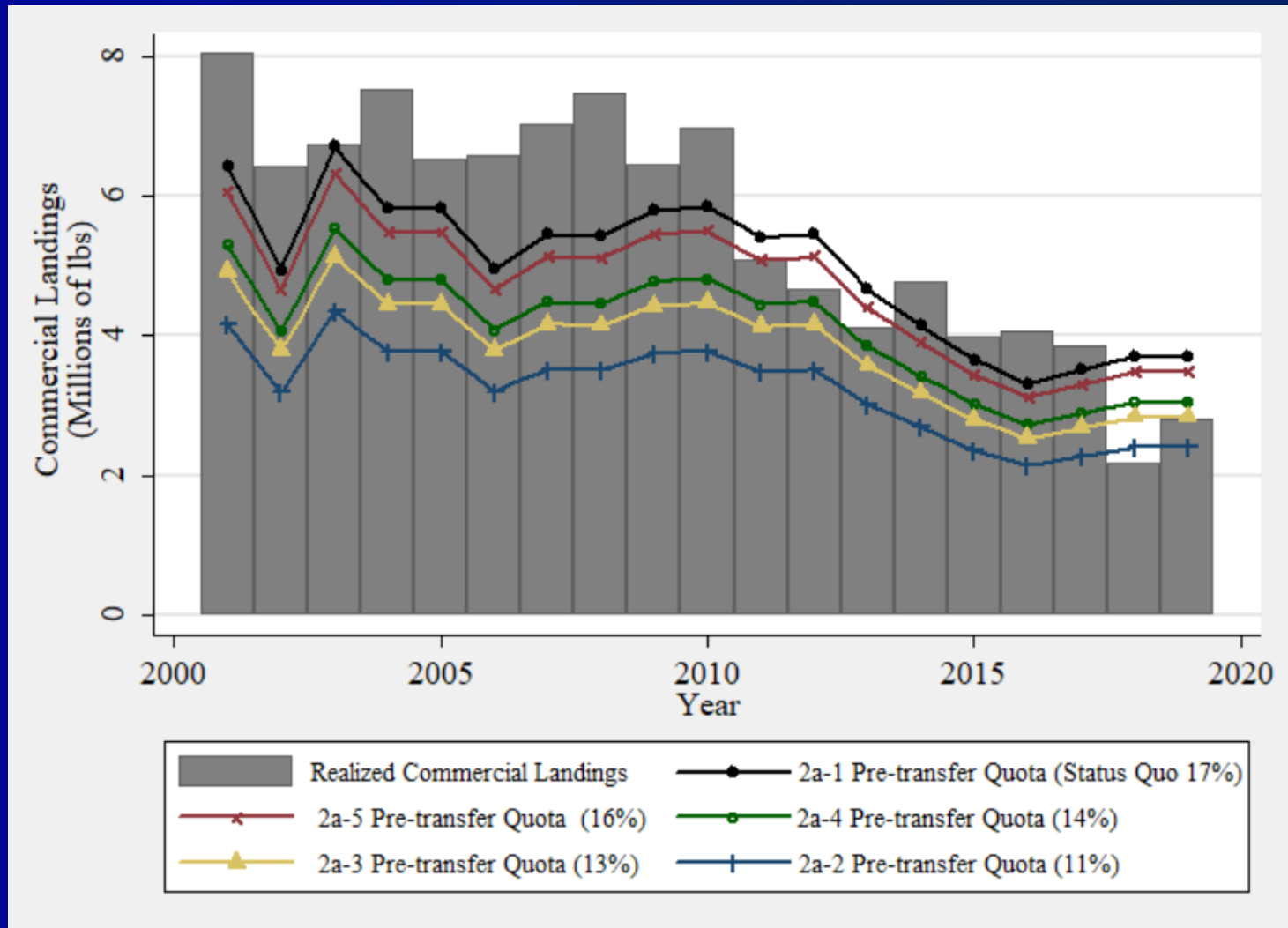
# Backup Slides



# Commercial/Recreational Sector Allocation Impacts

- We cannot precisely predict future quota and RHL under current or revised allocations
  - Depend on future biomass projections and resulting ABCs (unknown beyond 2021)
  - 2021 stock assessment and rebuilding plan have a big influence on the quota and RHL
  - Also depend on annual projections of sector-specific dead discards (Monitoring Committee recommends, usually based on recent trends)

# Commercial/Recreational Sector Allocation Impacts





# Commercial/Recreational Sector Allocation Impacts

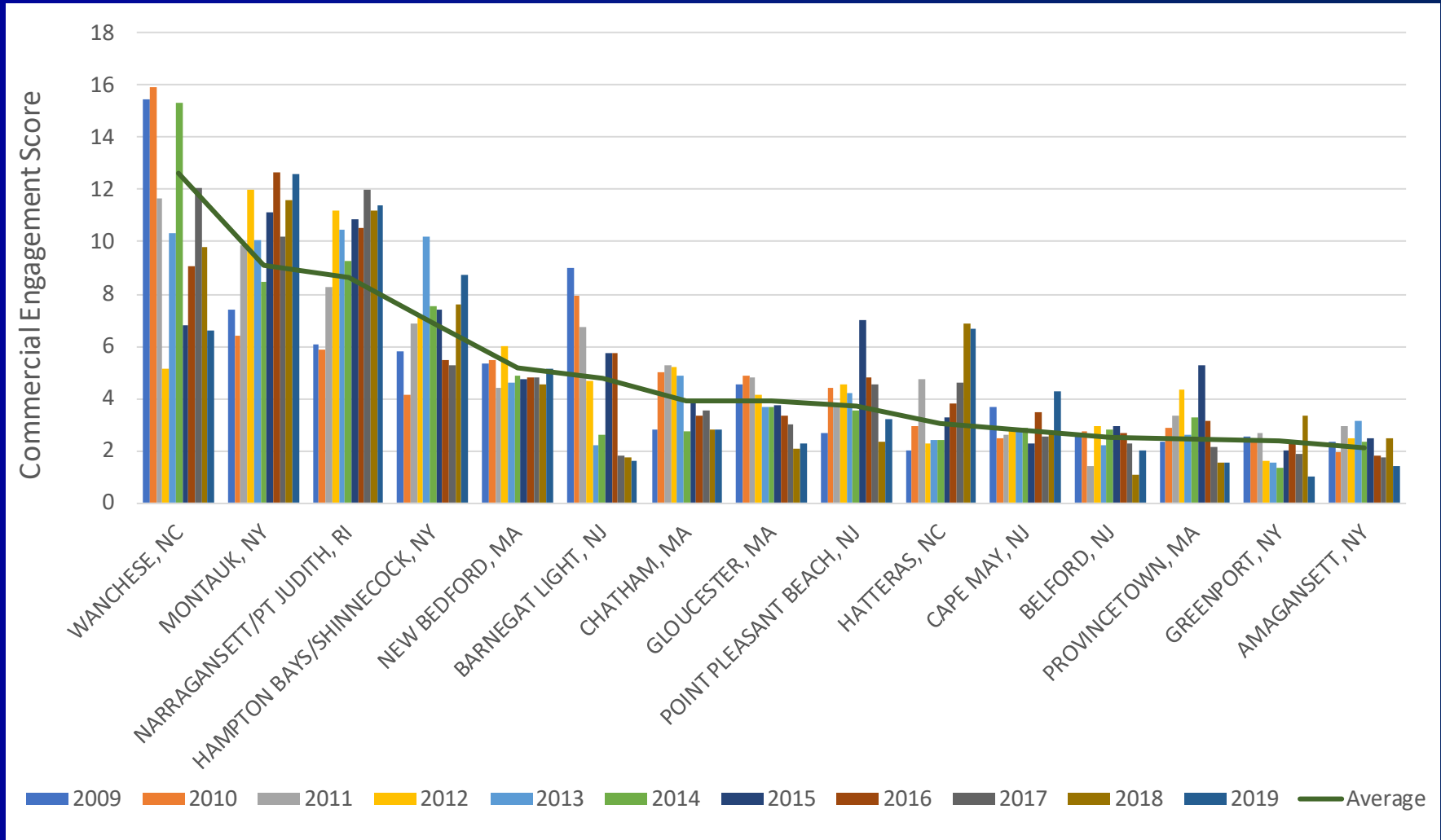
- Difficult to quantify economic impacts to the recreational sector
  - No demand model; data limitations
- Slightly positive economic impacts
  - Increase in quota may result in liberalization of bag limits, especially as stock rebuilds
  - Increases angler satisfaction
  - Potential to increase party/charter boat and supporting business revenues



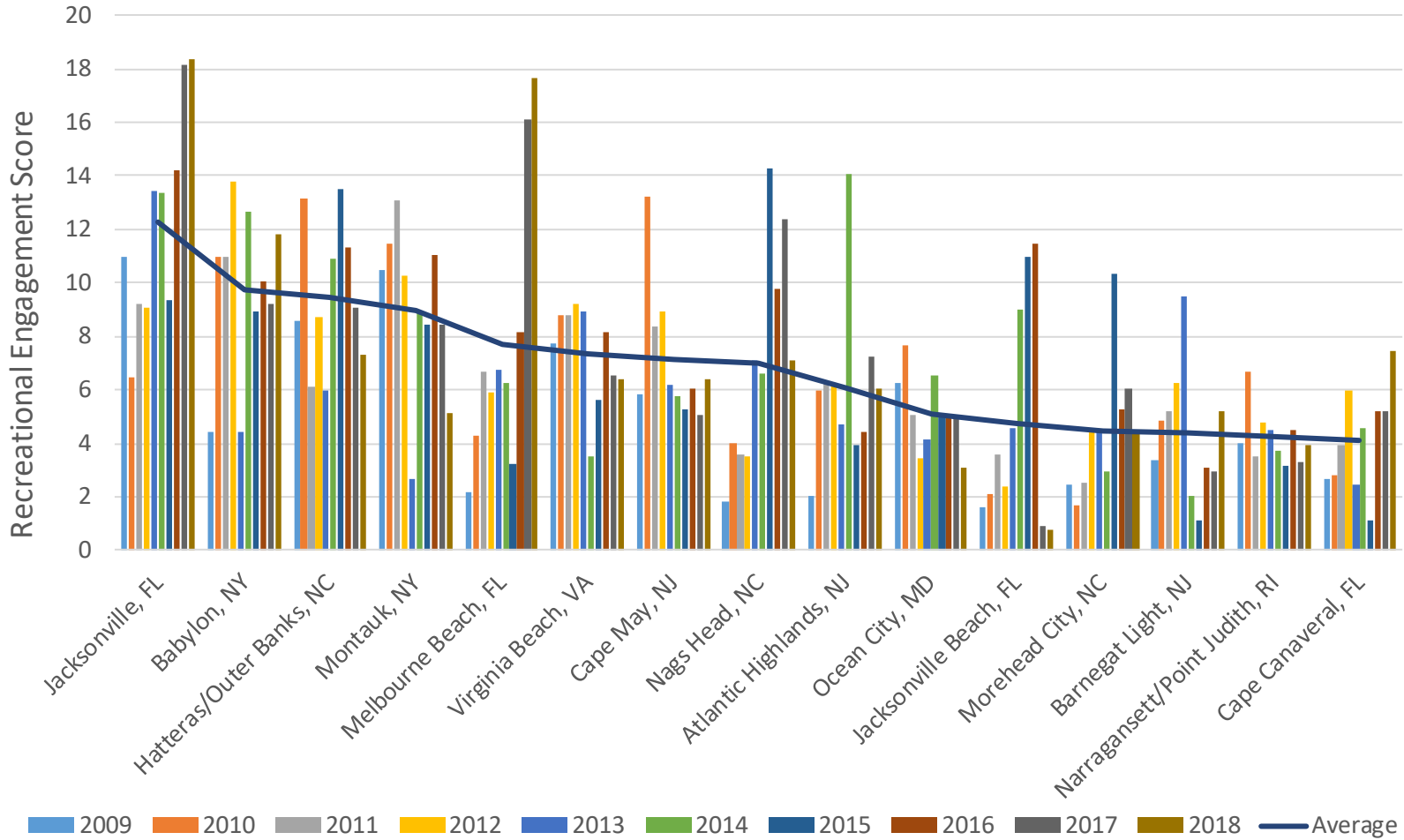
# 5.1.2 Commercial/Recreational Sector Allocation Impacts

Time Series	Average Differences in Estimated Revenues (Millions of 2020 Constant Dollars)			
	11% Commercial Quota (2a-2) vs 17% Status Quo (2a-1)	13% Commercial Quota (2a-3) vs 17% Status Quo (2a-1)	14% Commercial Quota (2a-4) vs 17% Status Quo (2a-1)	16% Commercial Quota (2a-5) vs 17% Status Quo (2a-1)
Averaged over Entire Time Series (1999-2019) <i>Standard Deviation</i>	-\$1.19M <i>0.14</i>	-\$0.79M <i>0.09</i>	-\$0.59M <i>0.07</i>	-\$0.20M <i>0.02</i>
Averaged over Past 10 Years (2010-2019) <i>Standard Deviation</i>	-\$1.09M <i>0.12</i>	-\$0.72M <i>0.08</i>	-\$0.54M <i>0.06</i>	-\$0.18M <i>0.02</i>
Averaged over Past 5 Years (2015-2019) <i>Standard Deviation</i>	-\$0.98M <i>0.03</i>	-\$0.65M <i>0.02</i>	-\$0.49M <i>0.01</i>	-\$0.16M <i>0.00</i>
<b>Average Percent Decrease Relative to Annual Status Quo Revenues (1999-2019)</b>	<b>35%</b>	<b>24%</b>	<b>18%</b>	<b>6%</b>

# 5.1.2 Commercial/Recreational Sector Allocation Impacts: Comm. Engagement Scores



# 5.1.2 Commercial/Recreational Sector Allocation Impacts: Rec. Engagement Scores



State	Incorrect	Revised May 2021
	No action/ Status quo (1981-1989)	No action/ Status quo (1981-1989)
ME	0.67%	0.67%
NH	0.41%	0.41%
MA	6.71%	6.72%
RI	6.80%	6.81%
CT	1.26%	1.27%
NY	10.37%	10.39%
NJ	14.79%	14.82%
DE	1.88%	1.88%
MD	3.00%	3.00%
VA	11.86%	11.88%
NC	32.01%	32.06%
SC	0.10%	0.04%
GA	0.10%	0.01%
FL	10.04%	10.06%
<b>Total</b>	<b>100.00%</b>	<b>100.02%</b>

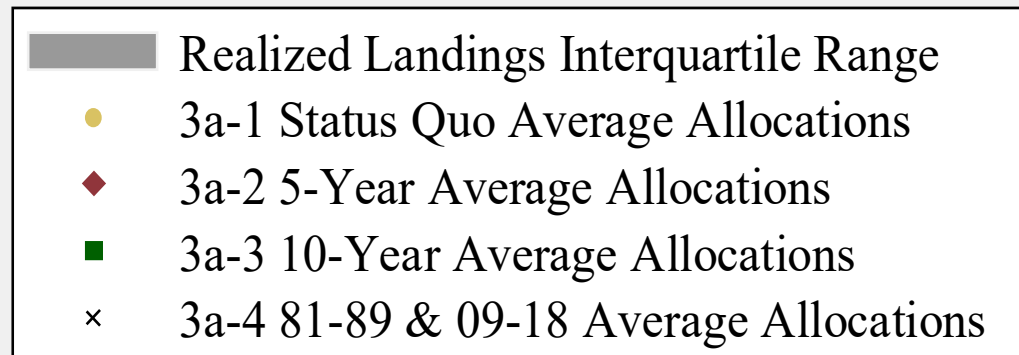
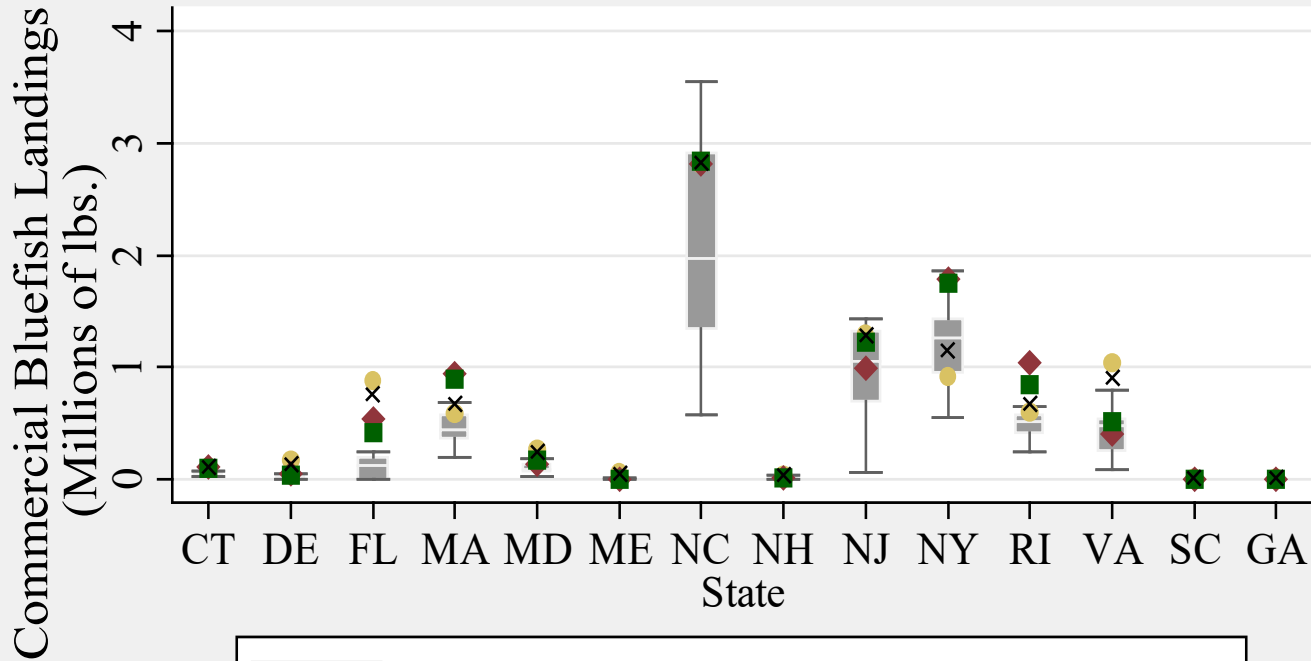
# Commercial Allocations to the States

## Phase-In Impacts

- The impacts are dependent on three main factors:
  1. Difference between the status quo allocation percentage and the allocation percentage selected
  2. Duration of the phase-in period, which will be the same duration as the preferred rebuilding plan
  3. Continuation of state-to-state transfers
- Allocations could shift by as much as 2.49 percentage points per year (NY), or as little as 0.01 percentage points (NH, SC, GA) per year



# Commercial Allocations to the States Impacts



**0.1% Minimum Default Allocation**

	<b>81-89</b>	<b>5-year</b>	<b>10-year</b>	<b>7-year</b>	<b>1/2 5-year</b>	<b>1/2 10 year</b>	<b>1/2 81-89</b>	<b>1/2 09-18</b>
<b>ME</b>	0.76%	0.10%	0.11%	0.11%		0.10%	0.58%	
<b>NH</b>	0.50%	0.13%	0.22%	0.26%		0.17%	0.42%	
<b>MA</b>	6.73%	10.59%	10.12%	11.58%		10.35%	7.65%	
<b>RI</b>	6.81%	11.74%	9.61%	11.73%		10.68%	7.58%	
<b>CT</b>	1.35%	1.26%	1.09%	1.29%		1.17%	1.28%	
<b>NY</b>	10.34%	20.12%	19.76%	21.77%		19.94%	12.93%	
<b>NJ</b>	14.71%	11.17%	13.85%	11.17%		12.51%	14.46%	
<b>DE</b>	1.95%	0.67%	0.49%	0.58%		0.58%	1.55%	
<b>MD</b>	3.06%	1.57%	1.92%	1.90%		1.75%	2.75%	
<b>VA</b>	11.81%	4.65%	5.87%	5.96%		5.26%	10.22%	
<b>NC</b>	31.71%	31.71%	32.03%	28.20%		31.87%	31.78%	
<b>SC</b>	0.14%	0.10%	0.10%	0.10%		0.10%	0.13%	
<b>GA</b>	0.11%	0.10%	0.10%	0.10%		0.10%	0.11%	
<b>FL</b>	10.02%	6.08%	4.78%	5.30%		5.43%	8.57%	



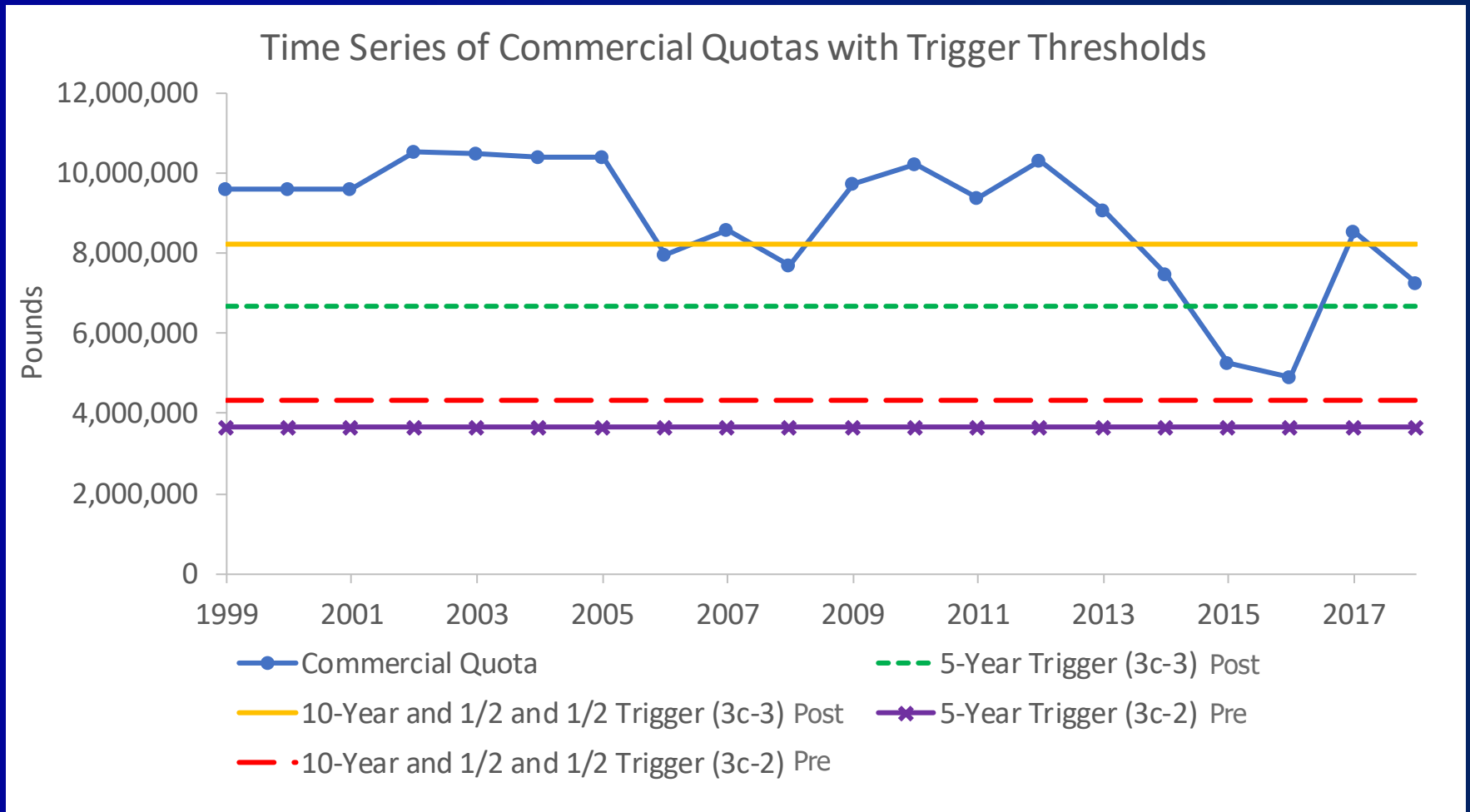
# State Share of Coastwide Harvest

State	2014-2018	2018-2020	Percentage Point Difference
ME	0.00%	0.01%	0.01%
NH	0.03%	0.00%	-0.03%
MA	10.64%	6.33%	-4.31%
RI	11.81%	12.63%	0.82%
CT	1.18%	1.43%	0.25%
NY	20.31%	18.09%	-2.22%
NJ	11.23%	5.20%	-6.03%
DE	0.58%	0.34%	-0.24%
MD	1.50%	0.81%	-0.69%
VA	4.62%	4.73%	0.11%
NC	32.06%	40.59%	8.53%
SC	0.00%	0.00%	0.00%
GA	0.00%	0.00%	0.00%
FL	6.07%	9.85%	3.78%

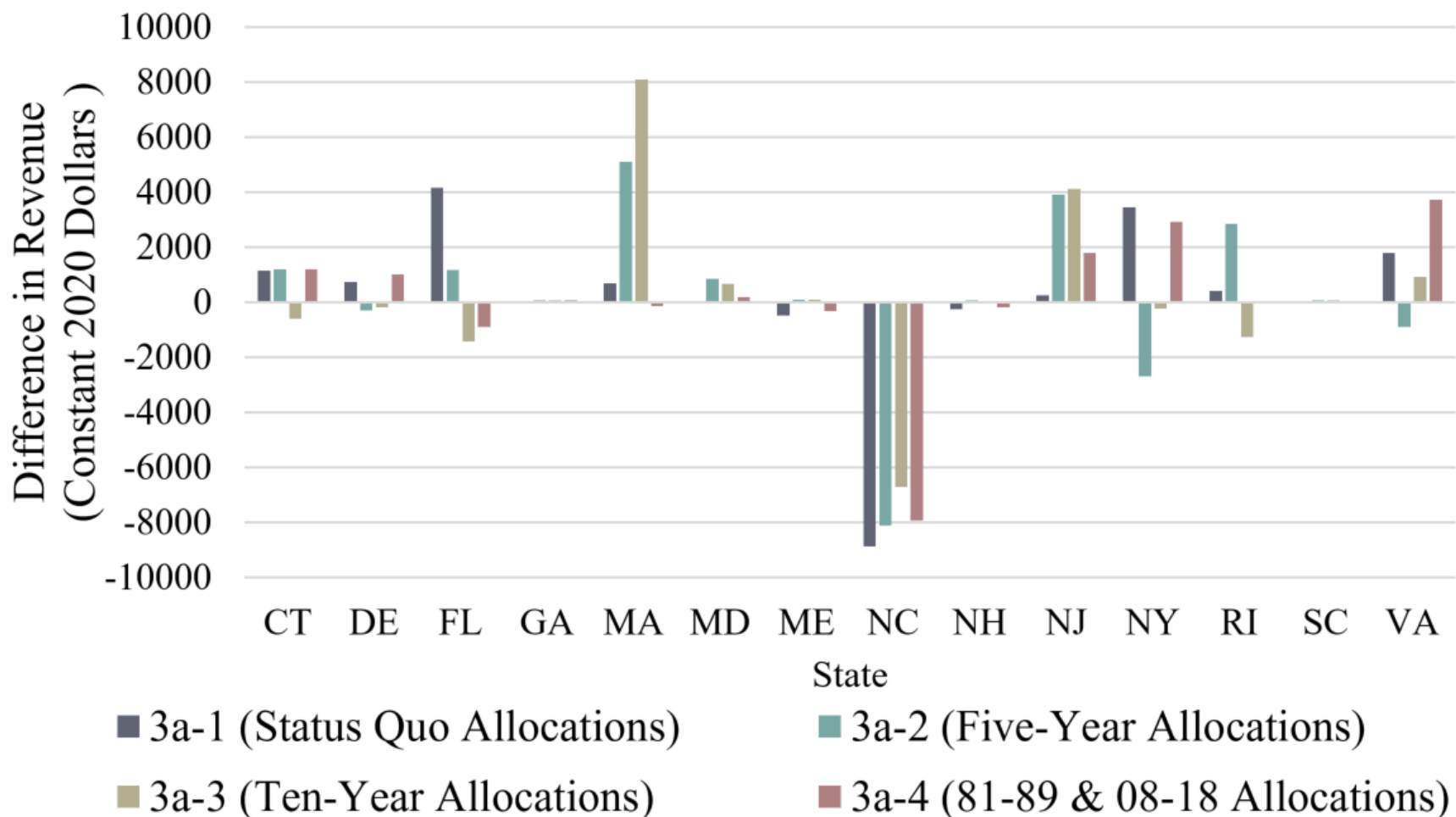
Year	Florida share of coastwide harvest (expressed as a percent)
2009	3%
2010	4%
2011	5%
2012	4%
2013	3%
2014	3%
2015	6%
2016	6%
2017	6%
2018	13%
2019	10%
2020	7%

# Commercial Allocations to the States

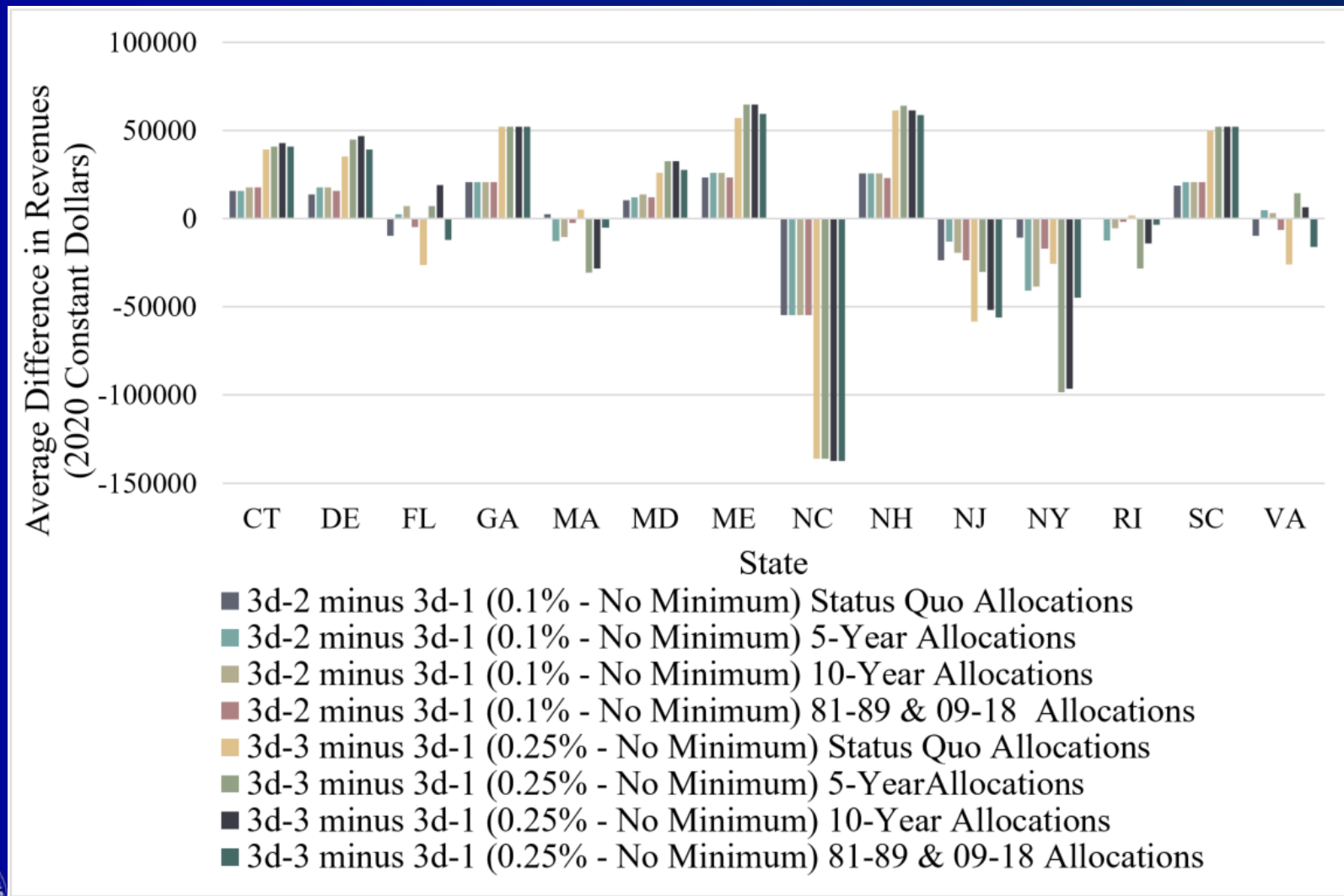
## Quota Trigger Impacts



# 6.3.2 Commercial Allocations to the States Quota Trigger Impacts



# 6.4.2 Commercial Allocations to the States Minimum Default Allocation Impacts

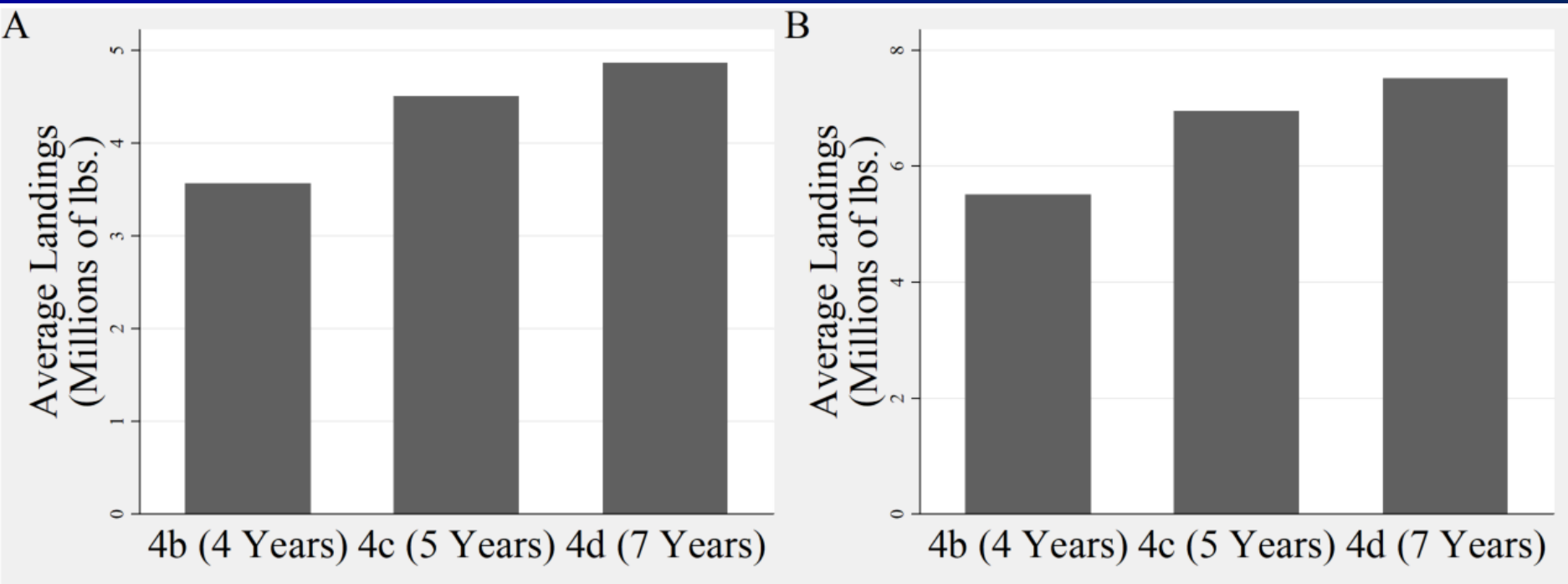


# Rebuilding Plan Impacts

- Without a demand model, it is unclear how the proposed rebuilding plans will impact recreational bluefish fishing effort
- Transition to new measures in 2020 and data challenges in 2020 further complicates impact analysis

# Rebuilding Plan Impacts

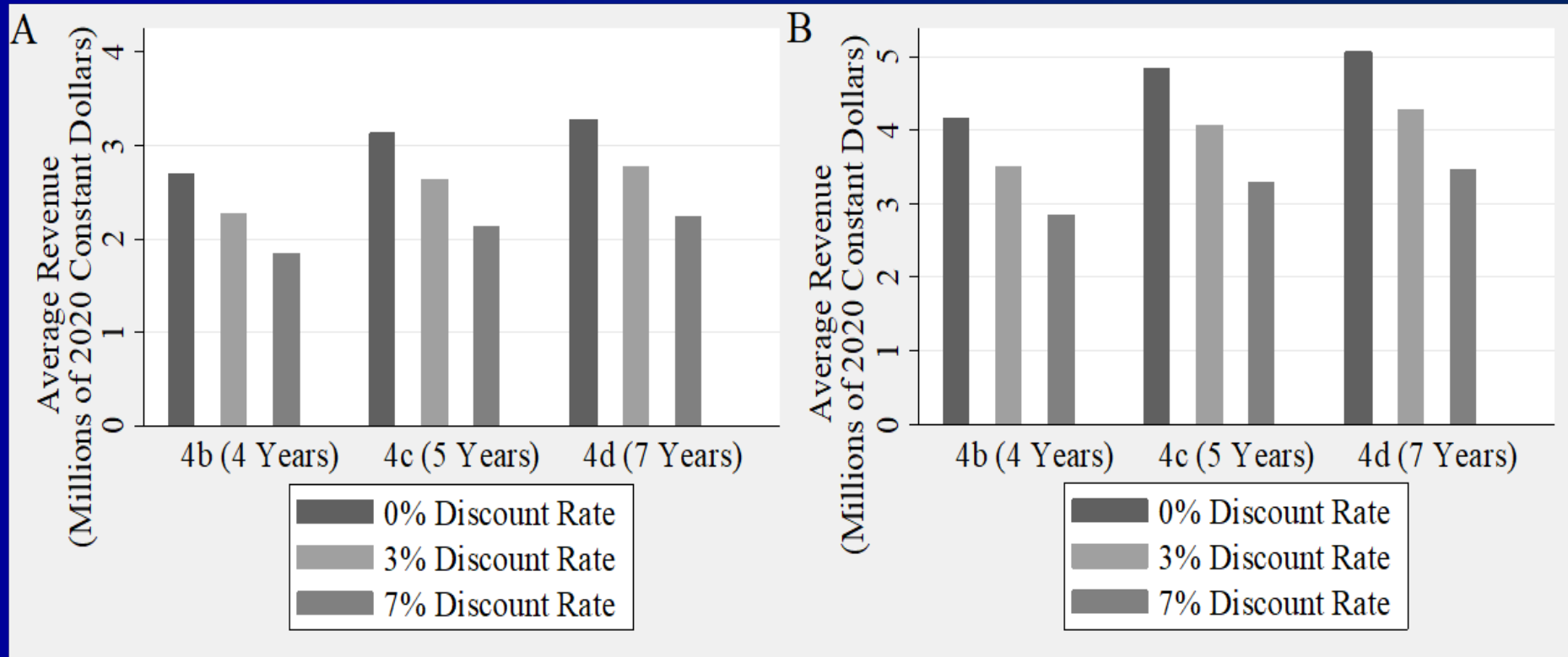
Average projected landings under each rebuilding plan



**11%** commercial allocation  
by rebuilding plan

**17%** commercial allocation  
by rebuilding plan

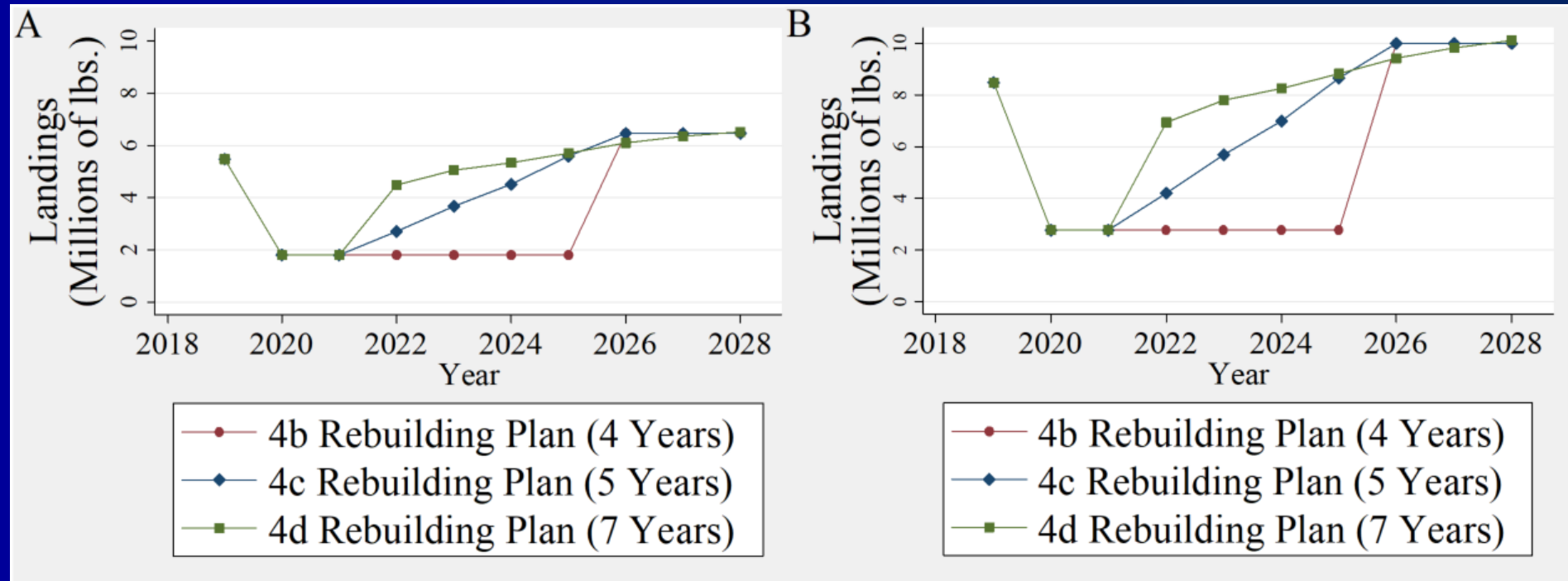
# 7.2 Rebuilding Plan Impacts



**Figure 16: Average annual commercial bluefish revenues (2019-2028) discounted at 0%, 3% and 7% by rebuilding alternative and under 11% (A) and 17% (B) commercial quota allocations.**



# 7.2 Rebuilding Plan Impacts



**Figure 13. Projected commercial bluefish landings under an 11% and 17% commercial sector allocation (A and B, respectively) by rebuilding plan for years 2019-2028.**

# Accountability Measures (AMs)

- Management Uncertainty
  - Adoption of 6b would implement sector specific ACLs, which would require adjustments to AMs
  - This change would model the AMs currently in effect for summer flounder, scup, and black sea bass
- Sector Transfers
  - Adoption of 5a-2 (bi-directional transfers) would require adjustments to AMs
- The AMs would be updated through the federal rulemaking process for this action



# Rebuilding Example

Specification	Rebuilding Plan Alternatives with Estimated Specifications			
	4a - No Action/ Status Quo	4b - Constant Harvest	4c - P* (Council Risk Policy)	4d - Constant Fishing Mortality
	2022 Fishing Year – M lbs (mt), Assuming 83% recreational , 17% commercial allocation			
<b>Rebuilding Plan Duration</b>	n/a	4 years	5 years	7 years
<b>Adjustment to Risk Policy</b>	n/a	no	n/a	yes
<b>Catch</b>	With no action, no rebuilding plan would be implemented, no changes to the current risk policy would occur, and the current specifications would remain in place.	16.28 (7,385)	24.74 (11,222)	40.73 (18,477)
<b>ACL</b>		16.28 (7,385)	24.74 (11,222)	40.73 (18,477)
<b>Commercial ACT</b>		2.77 (1,255)	4.21 (1,908)	6.92 (3,141)
<b>Recreational ACT</b>		13.51 (6,130)	20.53 (9,314)	33.81 (15,336)
<b>Commercial Discards</b>		0	0	0
<b>Recreational Discards (2019 estimate)</b>		5.17 (2,343)	5.17 (2,343)	5.17 (2,343)
<b>Commercial TAL</b>		2.77 (1,255)	4.21 (1,908)	6.92 (3,141)
<b>Recreational TAL</b>		8.34 (3,785)	15.36 (6,971)	28.64 (12,993)
<b>Commercial Quota</b>		2.77 (1,255)	4.21 (1,908)	6.92 (3,141)
<b>RHL</b>		8.34 (3,785)	15.36 (6,971)	28.64 (12,993)

# Sector Transfer Alternatives

- Existing bluefish quota transfer process (5a-1) described in table 21 of Public Hearing Document, proposed revisions (5a-2) to the process highlighted in green
- Key changes to process under alt 5a-2:
  - Council and Board are able to consider direction of transfer
  - No post-implementation review and adjustments by NOAA Fisheries in February



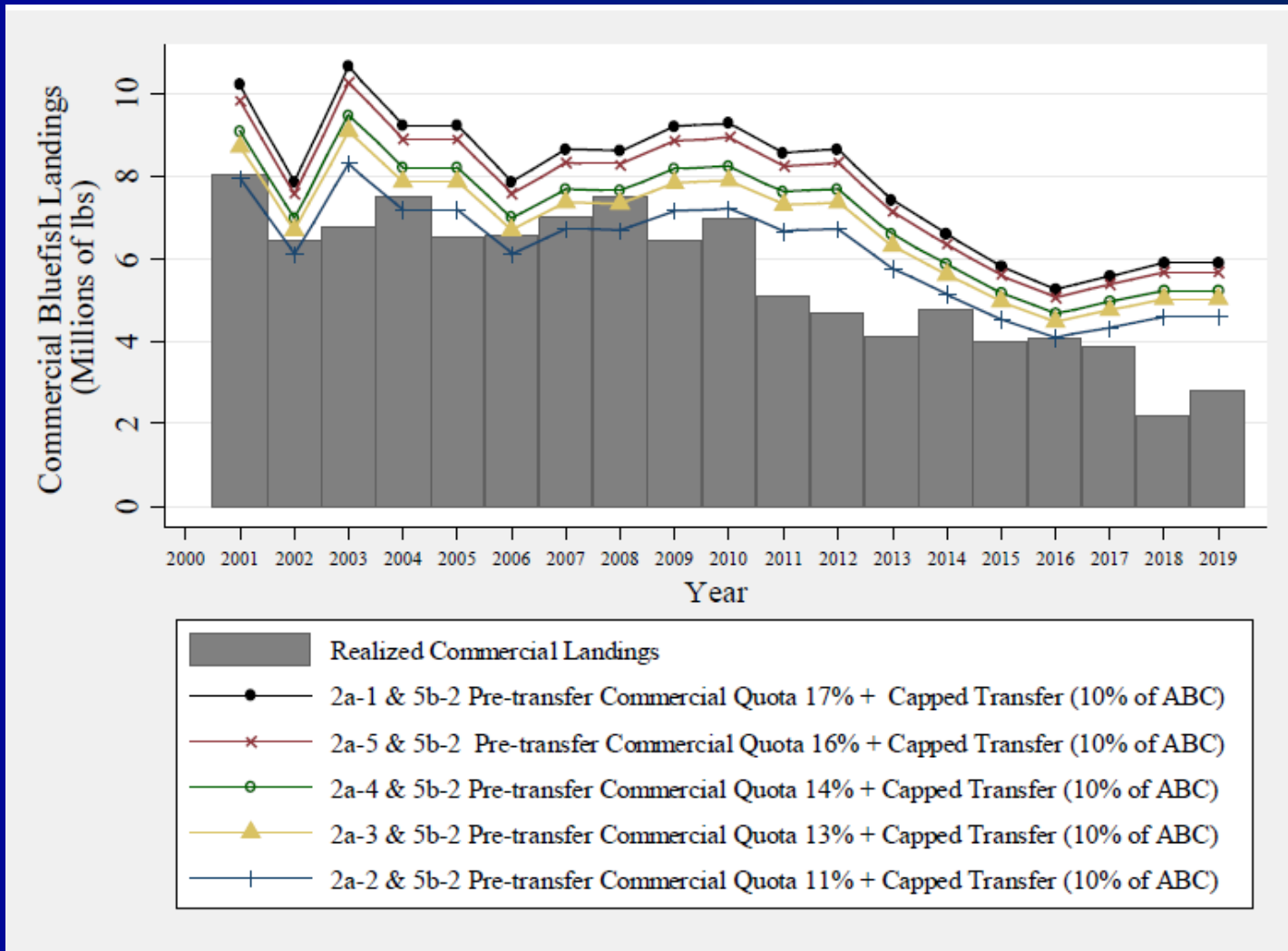
# Sector Transfer Impacts

- Alt 5a-1 (status quo) provides less flexibility and less access to quota increases for the recreational sector
- Alt 5a-2 may only provide positive socioeconomic impacts to the recreational sector if the transfer is large enough to support the liberalization of recreational measures
  - Bi-directional transfers have the potential to increase political complexity during the specifications process


# Commercial State-to-State Transfers

	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
ME	0	-52,000	-25,000	-45,000	0	0	0	0	0	-45,000	-30,000	-32,000	0	0	-16,357
NH	0	0	0	0	0	0	0	100,000	0	0	0	-20,000	0	0	5,714
MA	0	0	0	0	0	0	0	0	200,000	45,000	250,000	225,000	0	0	51,429
RI	0	60,000	155,000	-50,000	0	0	0	0	0	100,000	180,000	132,000	150,338	0	51,953
CT	0	0	0	-20,000	-75,000	0	0	0	0	0	0	0	0	0	-6,786
NY	0	250,000	450,000	455,000	425,000	0	200,000	50,000	300,000	250,000	550,000	420,000	0	0	239,286
NJ	0	0	309,125	0	0	0	0	0	-300,000	-50,000	0	-40,000	-50,000	0	-9,348
DE	0	-15,000	-80,000	-90,000	0	0	0	0	0	0	0	-50,000	0	0	-16,786
MD	0	-45,000	-50,000	-50,000	0	0	0	0	0	-50,000	0	-50,000	0	0	-17,500
VA	0	-525,000	-350,000	0	-150,000	0	0	0	0	0	-250,000	-210,000	-338	0	-106,096
NC	0	652,000	0	-100,000	0	0	0	-100,000	-200,000	0	-550,000	-225,000	-100,000	0	-44,500
SC	0	0	0	0	0	0	0	0	0	0	0	-150,000	0	0	-10,714
GA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
FL	0	-325,000	-409,125	-100,000	-200,000	0	-200,000	-50,000	0	-250,000	-150,000	0	0	0	-120,295

# 8.2.1 Transfer Cap Impacts



# Impacts of *De Minimis*

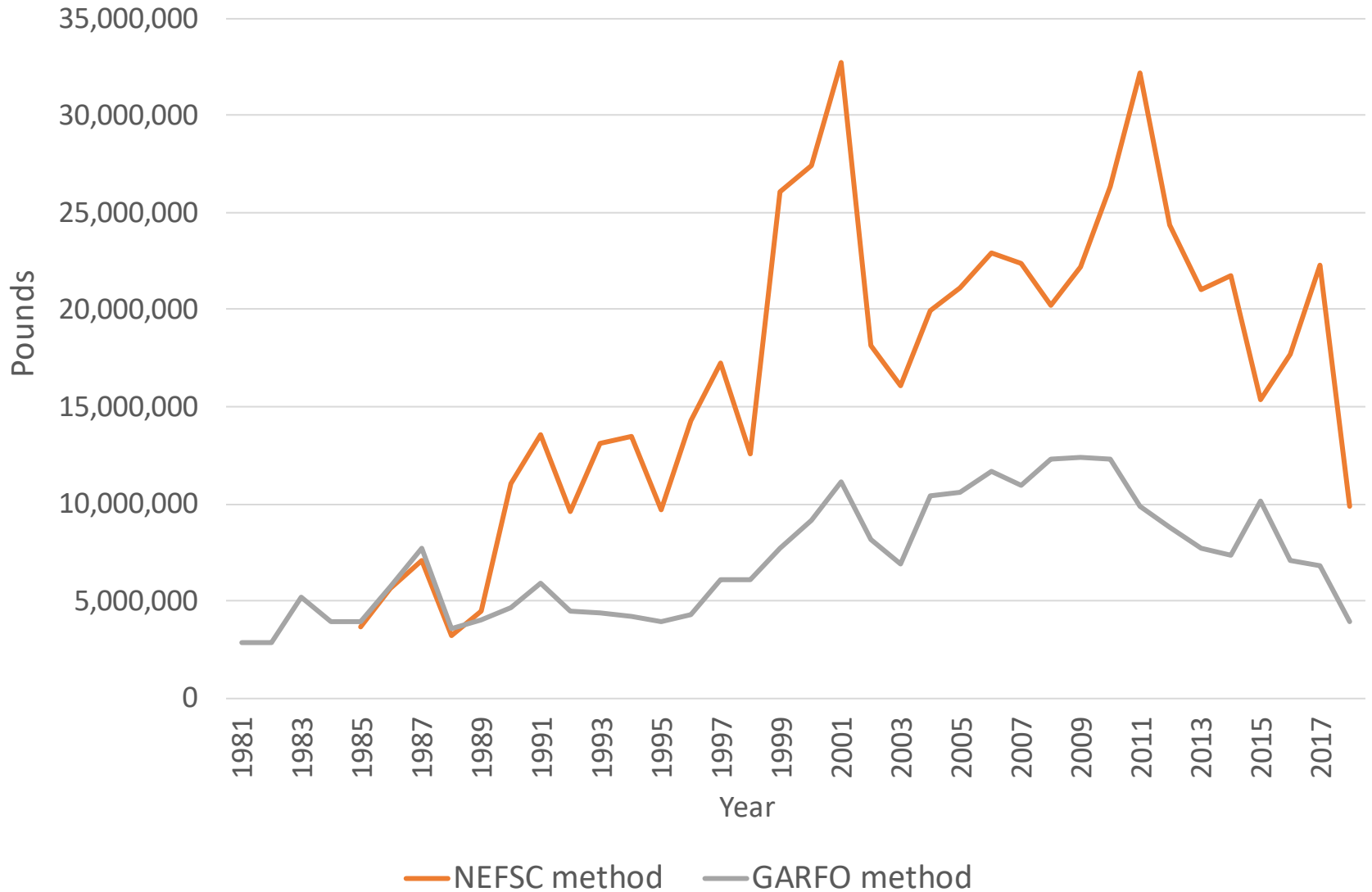
Alts	More economic benefit to <i>de minimis</i> states	
7b		
7c		
7d		
7e		Less economic benefit to <i>de minimis</i> states

## ■ Alternatives 7b-e:

- potential to complicate enforcement
- More flexible provisions reduce catch accountability in short term
- All alternatives prevent shifts in recreational effort from other states in the medium-long term through the 1% threshold requirement



# Recreational Dead Discard Estimates



# Recreational Reform Initiative

## Goals:

- **Stability** in rec. mgmt. measures (bag/size/season)
- **Flexibility** in the mgmt. process
- **Accessibility** aligned with availability/stock status\*

Technical Guidance Document	Framework/Addendum	Amendment
<ul style="list-style-type: none"><li>• Process for identifying and smoothing outlier MRIP estimates</li><li>• Use of preliminary current year MRIP data</li><li>• Guidelines for maintaining status quo measures</li></ul>	<ul style="list-style-type: none"><li>• Harvest Control Rule proposal put forward by 6 recreational organizations</li><li>• Envelope of uncertainty approach for determining if changes to rec. management measures are needed</li><li>• Multi-year recreational management measures</li><li>• Changes to the timing of recommending federal waters measures</li></ul>	<ul style="list-style-type: none"><li>• Rec. sector separation</li><li>• Rec. catch accounting</li></ul>

# Draft Motions

Move to approve 3a-3 (2009-2018 landings basis), 3b-1 (no phase in), 3c-1 (no trigger), and 3d-2 (0.10% minimum default allocation) for Alternative Set 3, Commercial Allocation to the States.

# Draft Motions

Move to approve 3a-4 (hybrid 1981-1989 & 2009-2018 landings basis), 3b-1 (no phase in), 3c-2 associated with 3a-3 (pre-transfer trigger of 4.31 M lb and reallocation above the trigger based on 2009-2018), and 3d-1 (no minimum default allocation) for Alternative Set 3, Commercial Allocation to the States.

# Draft Motions

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Move to approve the nomination to the Bluefish Advisory Panel for Charles T. Locke of NC