



Chub Mackerel Amendment Scoping Summary

June 5, 2017

The Council held six public scoping hearings on the chub mackerel amendment in May 2017 and solicited written comments from March 22 through May 31, 2017.

The Council received **a total of 10,564 comments** on the amendment. These comments included two form letters, one from the Billfish Foundation, which was submitted by 6 individuals in addition to the Billfish Foundation, and one from Pew Charitable Trusts with 10,523 signatures. **Fifty-five of the comments were unique** (with each form letter counting as one comment, substantive additions to the Pew form letter counting as separate comments, and identical comments provided in-person and in writing by the same individual counting as a single comment). The comments are summarized below by topic. A document with scoping hearing transcripts and all written comments can be found at: <http://www.mafmc.org/actions/chub-mackerel-amendment>.

General management considerations

- 13 comments stated that chub mackerel **management measures should be based on science**.
- 10,526 comments (4 of which were unique) said the Council should **consider the full range of management measures** outlined in the scoping document.
- 4 comments **supported the stock in the fishery management approach**.
- 2 comments called for **coordination with other agencies** such as the National Marine Fisheries Service Atlantic highly migratory species (HMS) office and the New England, South Atlantic, and Gulf of Mexico Fishery Management Councils.
- 7 comments called for **greater involvement of recreational HMS fishermen in development of this amendment**, especially as HMS fishermen are under-represented on the Council and on the Council's advisory panels (APs)

General ecosystem considerations

- 10,543 comments (15 of which were unique) stated that the **Council should develop management measures to protect the role of chub mackerel in the ecosystem**, either focusing specifically on their role as prey for HMS, or their role as prey more broadly.
- 7 comments stated **that either the goals and objectives for the amendment or the purpose and need statements should explicitly state that the amendment aims to avoid negative impacts to chub mackerel predators**.
- 2 comments stated that **an ecosystem approach to fisheries management (EAFM) should allow for increased harvest of species that become more abundant with climate change**, especially as chub mackerel will become more abundant in the Mid-Atlantic as waters continue to warm.

- One comment stated that EAFM does not require no harvest of forage species.
- In addition to the concerns specific to HMS, summarized in the next section, **3 comments expressed concern for potential negative impacts on other chub mackerel predators, especially pilot whales**, but also fin whales, black sea bass, summer flounder, bluefish, bullet mackerel, and false albacore.
- 2 comments stated that the **scientific literature does not clearly demonstrate that a decrease in the abundance of forage species leads to a decrease in predator abundance**.

Spatial/temporal conflicts between the commercial chub mackerel fishery and recreational HMS fisheries

- 6 comments expressed **concern about the potential for localized depletion of chub mackerel** due to commercial fishing, which could negatively impact recreational fisheries for chub mackerel predators, especially recreational HMS fisheries.
- 10,523 comments (8 of which were unique) stated that the Council should **consider spatial and/or temporal closures**. Several of these comments suggested closures as a solution to conflicts between the commercial chub mackerel fishery and recreational HMS fisheries. Suggestions included a prohibition of commercial chub mackerel fishing between 50 and 100 fathoms and localized closures until white marlin have migrated out of the area.
- 6 comments **opposed spatial and/or temporal closures**, arguing that such closures would effectively prohibit the commercial chub mackerel fishery, would negatively impact the *Illex* squid fishery, and are not necessary as the commercial fishery will not negatively impact chub mackerel predators, which opportunistically prey on many species.

Catch limits (ABC and OY)

- 8 comments stated that the Council should **set optimum yield (OY) at a level that accounts for the biological and economic impacts of chub mackerel harvest on HMS and HMS fisheries**.
- 10 comments said that **any increase in commercial chub mackerel catch is risky**, especially without a scientific basis.
- 5 comments stated that options should be considered to **set the acceptable biological catch (ABC) or OY at a level that would prevent catch from expanding beyond recent levels**.
- One comment stated that the Council should consider setting OY to 0.
- One comment suggested that catch limits should fluctuate in response to changes in recruitment.
- 2 comments stated that the **Council should base catch limits on ecological reference points** such as a biomass threshold of 40% of an unfished population and a biomass target of 75% of an unfished population.

Commercial quota

- 10 comments stated that **the temporary 2.86 million pound landings limit established through the Unmanaged Forage Amendment should be extended beyond three years**, at least until a stock assessment is complete and the Council has a better understanding of the potential impacts of higher landings limits.
- 3 comments stated that the **commercial quota should be higher than 2.86 million pounds** until a biologically-based ABC is established.
- 7 comments stated that **the commercial catch should be reduced or limited** but did not reference a specific level of catch.
- 2 comments said that **commercial harvest should be totally prohibited**.
- One comment said the quota should be 222,000 pounds.

Minimum fish size

- 2 comments stated that **minimum fish sizes are not needed** as chub mackerel grow quickly and reach maturity at a young age. In addition, other low-trophic level species such as Atlantic mackerel, *Illex* and longfin squid, and butterfish are not managed with minimum fish sizes.

Commercial possession limits

- 2 comments stated that **commercial possession limits are not needed**.
- One comment said that commercial possession limits should be set at a level to allow for landings of incidental catch but discourage targeted fishing.

Gear restrictions

- 4 comments stated that because the chub mackerel fishery is largely a component of the *Illex* squid fishery (both species are targeted by the same vessels, with the same gear, and sometimes on the same trips), **gear restrictions are not needed**.
- The Pew Charitable Trusts form letter with 10,523 signatures called for **consideration of gear restrictions**.

Control date

- 10,525 comments (3 of which were unique) **recommended that the Council establish a control date**. One commenter saw this as a way to protect the interests of fishermen who are already involved in the fishery. Another commenter said this could be a way to prevent the fishery from expanding.

Limited access

- 2 comments said that **limited access is not needed**.

Recreational management measures

- 2 comments stated that **a portion of the ABC should be allocated to the recreational chub mackerel fishery**.
- One comment stated that a special permit should not be required to fish for chub mackerel recreationally.

Management unit

- 3 comments stated that **management measures should apply beyond the Mid-Atlantic**, and specifically should include New England. Two of these comments argued that if restrictive quotas were implemented and applied only to the Mid-Atlantic, then Mid-Atlantic fishermen alone would bear the burden of ensuring a sustainable fishery.

Data/analysis needs

- 10,530 comments (8 of which were unique) stated that the Council needs to **thoroughly analyze the economic and biological tradeoffs of various levels of commercial chub mackerel harvest**. Five of these comments said such an analysis should focus specifically on potential negative impacts to HMS fisheries.
- 7 comments stated that the **Council needs to gather more data to inform management decisions**.
- 8 comments called for **collaborative research with commercial fishermen** to gather data to inform management measures and to monitor the stock.
- 5 comments stated that the **Council needs a better understanding the role of chub mackerel in the diets of HMS**.
- 2 comments expressed concern that **traditional stock assessments won't account for the needs of predators**.
- 2 comments stated that chub mackerel **landings cannot be considered a proxy for abundance** as landings are influenced by many factors, including fisheries for other species such as *Illex* squid and Atlantic herring.
- One comment stated that landings data prior to the mid-2000s are uncertain and that chub mackerel landings may have been reported as Atlantic mackerel or mackerel unclassified.

Economic considerations

- 18 comments (11 of which were unique) stated that the **economic value of recreational HMS fisheries, including HMS fishing tournaments, is much greater than the value of the commercial chub mackerel fishery**.
- 5 comments said the **economic importance of the commercial chub mackerel fishery was not accurately described in the scoping document**, emphasizing that this fishery has economic multipliers through its various support businesses, provides year-round employment, and provides food for the U.S. and for third world countries.

Commercial fishery considerations

- 2 comments stated that **chub mackerel can be an economic bailout for certain fishermen when *Illex* squid are not available**.
- 3 comments stated that **chub mackerel were available but not targeted commercially until recently because there was no market**.

Other comments

- 6 comments requested that the Council **analyze, and if needed, consider mitigation measures for, bycatch** in the chub mackerel fishery due to spatial overlap of the fishery

with other commercially and recreationally important species such as blueline and golden tilefish, black sea bass, several grouper species, and juvenile bluefin tuna.

- One comment recommended that the Council develop a policy on emerging fisheries through a separate action.
- One comment stated that chub mackerel accountability measures (AMs) should be similar to Atlantic mackerel AMs, with incidental possession limits coming into effect when 90% of the ABC is caught and no possession allowed when 100% of the ABC is caught.
- One comment stated that recreational fisheries, including tournaments, play a greater role in contributing to the overfished and overfishing status of white and blue marlin than the commercial chub mackerel fishery.