**Summer Flounder, Scup, and Black Sea Bass Monitoring Committee (MC)**
**September 16-17, 2019 Meeting Summary**
**Baltimore, MD**

**Monitoring Committee Attendees:** Alex Aspinwall (VMRC), Julia Beaty (MAFMC staff), Peter Clarke (NJ F&W), Dustin Colson Leaning (ASMFC staff), Karson Coutre (MAFMC staff), Kiley Dancy (MAFMC staff), Steve Doctor (MD DNR), Emily Gilbert (GARFO), John Maniscalco (NY DEC), Jason McNamee (RI F&W; via webinar), Kirby Rootes-Murdy (ASMFC staff; Tuesday only), Caitlin Starks (ASMFC staff), Mark Terceiro (NEFSC; via webinar), T.D. VanMiddlesworth (NC DMF), Greg Wojcik (CT DEEP)

**Additional Attendees:** Alan Bianchi (NC DMF; via webinar), Steve Cannizzo (NY RFHFA; via webinar), Greg DiDomenico (GSSA; Tuesday only), Nichola Meserve (MADMF; via webinar)

## Black Sea Bass 2020-2021 Specifications

Under the MC's recommended approach to estimating discards (described below), the black sea bass commercial quota and recreational harvest limit (RHL) would increase by up to 56% in 2020 compared to 2019 (Table 1). **The MC agreed that a commercial quota increase of this magnitude from one year to the next could have unintended socioeconomic consequences**, especially if reductions are needed in future years, as would be required under standard/varying acceptable biological catch (ABC) limits or if the sector allocations are modified through an amendment.

The MC agreed that there is some uncertainty regarding how the commercial fishery will respond to a quota increase of this magnitude. For example, some members from states with comparatively high quota allocations said the commercial fisheries in their states might not harvest their full allocations, while others from states with lower allocations said their states would harvest the full increase. The group agreed that this uncertainty does not justify a management uncertainty buffer between the annual catch limit (ACL) and the annual catch target (ACT) as the commercial fishery is well-monitored and controlled. They agreed that **both the commercial and recreational ACTs should be set equal to their respective ACLs**, consistent with past practice for this species.

Although the RHL could increase by 56% from 2019 to 2020, recreational harvest will likely need to be notably restricted in 2020 to prevent the RHL from being exceeded. For example, under the revised Marine Recreational Information Program (MRIP) data, recreational harvest in 2018 was 7.92 million pounds, 39 - 44% higher than the potential 2020 RHL, depending on the approach used to establish the ABC. Several MC members agreed that **a reduction in recreational harvest of over 30% in 2020 is very hard to justify given that biomass is 240% of the biomass target, availability is very high, and restrictions of that magnitude would likely lead to increased discards which could result in an ACL overage**. The group has strong concerns about the potential necessary reductions in recreational harvest given these circumstances.

The MC stressed that **it is imperative that the Council and Board take action to address the commercial and recreational allocation percentages defined in the Fishery Management Plans (FMPs) for summer flounder, scup, and black sea bass**. These allocations do not reflect

recent patterns of commercial and recreational catch based on the new MRIP data. This is one of many factors driving the need to restrict recreational black sea bass landings while allowing an increase in commercial landings.

The MC acknowledged that they have a very limited ability to impact the 2020 RHL. For example, they can recommend a management uncertainty buffer from the ACL to the ACT and they can recommend the most appropriate values for expected discards. Other options such as a transfer of quota from the commercial sector to the recreational sector or a change in the allocations defined in the FMP are not possible without an amendment, which could not be implemented in time to impact the fishery in 2020.

The MC had a thorough discussion of the appropriate methodology for calculating expected discards in 2020 and 2021. For several years, the MC has calculated expected black sea bass discards by first dividing the ABC into a landings portion and a discards portion based on the most recent three year average proportions of total (commercial and recreational) landings and discards based on data provided by the Northeast Fisheries Science Center (NEFSC, the same data used in the stock assessment). The discards portion was then further divided into expected commercial discards and recreational discards based on the most recent three year average of discards by sector based on NEFSC data.

The National Marine Fisheries Service Greater Atlantic Regional Fisheries Office (GARFO) uses the NEFSC recreational discard estimates for recreational ACL monitoring; however, they calculate separate commercial discard estimates for commercial ACL monitoring. The GARFO and NEFSC estimates can differ substantially in some years. Some MC members suggested that if the GARFO estimates are used for ACL accountability, then they should also be used to calculate ACLs, ACTs, and quotas. Other MC members noted that there are ongoing discussions between GARFO and NEFSC regarding the differences in their estimates and their appropriate use. The MC agreed to continue using the NEFSC discard estimates in recommending specifications until they can consider the differences in the two sets of estimates in greater detail and until the NEFSC and GARFO discussions reach a conclusion.

The MC discussed whether an increase in the commercial quota would be expected to cause discards to decrease because more fish could be landed, or if increased fishing effort would result in discards also increasing. Trends in commercial quotas, landings, and discards since 1998 suggest that commercial black sea bass landings closely follow changes in the quota and that discards tend to scale up or down with increases or decreases in landings. The MC also noted that sector-specific discards as a proportion of sector-specific catch have been relatively consistent over at least the past three years, even under varying commercial quotas and RHLs and highly variable recreational harvest estimates over that time period (including two years with outlier recreational estimates). They also noted that their past approach of using the most recent three-year average proportions of total landings, total discards, and sector-specific discards has notably under-predicted discards, leading to ACL overages in both sectors in many recent years. The MC, therefore, agreed that consideration of a new approach to predicting black sea bass discards was warranted.

**The MC recommended that expected commercial and recreational discards in 2020-2021 be calculated based on the assumption that discards in each sector as a proportion of catch in each sector would be equal to the 2016-2018 average proportions based on NEFSC data** (Table 2). The calculations also factored in the requirement that 49% of the landings proportion of

the ABC must be allocated to the commercial fishery and 51% to the recreational fishery. The resulting expected discard values are shown in Table 1. The MC agreed that this methodology is more appropriate than the previous methodology for estimating black sea bass discards as it scales discards with expected changes in landings (assuming the commercial quota and RHL will be fully landed and not exceeded), consistent with observed patterns in the fishery. It also gives equal weight to the sector-specific proportions in each of the three years, thus downplaying the influence of any potential single year outliers. The resulting discard values combined with the allocation percentages defined in the FMP and the Monitoring Committee's recommendation that the ACTs be set equal to their ACLs result in the catch and landings limits shown in Table 1.

As previously stated, the values in Table 1 include 42-76% increases in the ABC and commercial and recreational catch and landings limits in 2020 relative to 2019, depending on the measure and ABC approach used. The MC agreed that **the Council and Board should be cautious when making such large adjustments in a single year as this could have unintended biological and socioeconomic consequences**. They agreed that there could be benefits to taking the increase incrementally over multiple years; however, they did not feel that they had the ability to recommend an appropriate incremental approach under the constraints of the current management system and considering the different implications of the 2020 catch limits for the commercial and recreational sectors.

The MC recommended no changes to the commercial minimum fish size of 11 inches, the 4.5 inch diamond minimum mesh size and associated seasonal incidental possession limits (i.e., 500 pounds during January - March and 100 pounds during April - December), and the current gear requirements for pots/traps for 2020. No new information or public comments supported changes in these regulations for 2020.

One member of the public provided comments during the meeting. He echoed the MC's concerns about increasing catch limits drastically from one year to the next. He said instability in management measures is an enormous problem. He added that stakeholders will argue for as much quota as possible, even if it may not be used, due to fears about future reallocations. He added that better monitoring, improved reporting, and changes to the permit regulations are needed for both the commercial and recreational sectors.

## Summer Flounder 2020 Specifications

**The MC made no changes to their previous recommendations for 2020 specifications.** This includes commercial and recreational summer flounder ACTs that are set equal to their respective ACLs, with no reduction for management uncertainty. The previously adopted commercial and recreational catch and landings limits are shown in Table 3.

At both the February 2019 meeting and this September 2019 meeting, the MC expressed concern with recent ACL overages caused by higher than expected commercial discards. Observer data indicate that a high proportion of discards in 2017 and 2018 were likely driven by quotas that were well below average. The MC expects that discards will decrease in 2019 as the result of increased quotas. However, it is worth noting that the MC also discussed the relationship between landings and discards for scup and black sea bass and found that the relationship between quota changes and discards is not always clear and varies by species. The MC will continue to monitor discards in the commercial fishery for potential changes that may be needed to discard projections or management measures in future years.

Recreational fishery performance is variable and many factors influence recreational catch and effort. The MC has increased efforts to address management uncertainty through the recreational measures setting process, including approaches to respond to imprecision in the recreational data and development of additional tools to evaluate changes in measures. Similar to discards in the commercial fishery, the relationship between RHLs and recreational discards should be explored in more detail. Methods for calculating and responding to recreational discards in the recreational fishery may be modified in the next round of specifications for summer flounder. The MC agreed that no changes to their previous recommendations for 2020 recreational catch and landings limits are necessary, including their previous recommendation that the recreational ACT be set equal to the ACL.

**The MC agreed with the staff recommendation that no changes be made to the commercial minimum fish size (14-inch total length), commercial gear requirements, and exemption programs for 2020.** As discussed in the "Minimum Mesh Size Regulations" section below, the MC revisited the 2018 commercial mesh size selectivity study results for summer flounder. The MC recommends no changes to the minimum mesh size for 2020, but will revisit this issue following further evaluation and analysis of potential effects of mesh size changes and input from industry.

## Scup 2020-2021 Specifications and Scup Discards Report

The MC felt that it was appropriate to continue to monitor scup discards and no immediate management action is needed. One member suggested analyzing discards from a hypothesis testing approach in the future (e.g., focusing on the question of did changes in the scup Gear Restricted Areas impact discards coming from the squid fishery) and noted that there are several confounding factors like seasonality in where the fishery operates and seasonality in discards, so the problem is multivariate in nature, and a hypothesis testing approach may help to focus in on the important questions and reduce the complexity of the analysis. MC members and one member of the public felt that high recruitment had more of an impact on discards than the recent change to the southern gear restricted area (GRA) boundary. MC members agreed that discards may continue to decline due to the strong relationship between discards and recruitment and the below average recruitment since 2016. One member of the public commented that discards are a problem and everyone wants to address them, adding that the Science Center for Marine Fisheries has funding to conduct an analysis of discards to further understand the issue. He also added that this year there are large scup south of Hudson Canyon for the first time in 10 years. In addition, he said some discards could be turned into landings by considering an 8” minimum size. Multiple MC members noted that scup are not fully mature at that size and did not want to consider a minimum size that included a high proportion of immature fish.

The MC discussed the appropriate methodology for calculating expected scup discards in 2020 and 2021. For the past several years, projected discards from the stock assessment have been apportioned between commercial and recreational fisheries using the average percent of dead discards attributable to each sector over the previous three years based on NEFSC data. The MC felt that using a 10-year average would help smooth out year-to-year variability which can be driven by recruitment and other factors and may better estimate expected discards. Additionally, since there is a relationship between recruitment and discards, using a longer term average is more consistent with how recruitment is handled in the stock assessment projections, therefore this creates a logical consistency between the discard assumptions being used by the MC and aspects

of the assessment projection methodology. **The MC therefore recommended using the current method of calculating the proportion of discards by sector using a 10-year average instead of a 3-year average.** The MC discussed that scup discards are sensitive to large recruitment events and unlike black sea bass, landings and discards don't have a consistent relationship for both sectors. Therefore, they agreed that it was appropriate to use a different methodology for scup compared to black sea bass. One MC member added that in future years the MC can be flexible on how to calculate discard proportions to account for factors such as large recruitment events. The resulting expected discards and the **MC recommendation that the ACTs be set equal to their ACLs** result in the catch and landings limits shown in Table 4.

Based on the revised MRIP data, recreational harvest in 2018 was 12.98 million pounds, 99-136% higher than the potential 2020 RHL, depending on the approaches used for the ABC and expected discards. Recreational harvest will need to be restricted in 2020 to prevent the RHL from being exceeded. The MC again discussed the importance of a Council and Board action to re-evaluate the commercial and recreational allocation defined in the FMPs.

The MC also discussed the varying and averaged ABC approaches. One benefit of the varying approach is that there would be a smaller decrease in RHL in 2020 and there may be the possibility of allocation issues being alleviated through Council action by 2021. However after some discussion, MC members felt that due to the potential large reductions to the recreational fishery, stability across the two years may be preferable to the back-to-back reductions under the varying ABC approach. The MC generally preferred the averaged ABC approach. They also **recommended no changes to the commercial minimum fish size, minimum mesh size, possession limits, gear requirements, and quota period regulations for 2020.**

## Minimum Mesh Size Regulations

The MC revisited the 2018 mesh selectivity study for summer flounder, scup, and black sea bass by Hasbrouck et al. (2018)[1] which they previously discussed in July 2018. The results suggest that, in general, the current minimum mesh sizes are effective at releasing catch of most undersized and immature fish, but modifications could be considered to allow for consistent mesh sizes for black sea bass and scup, and to potentially reduce discards of undersized summer flounder. The MC had previously identified additional analyses and input needed from industry before recommending changes to the mesh size regulations. Other recent management priorities such as responding to recent scup and black sea bass operational assessments, sector allocation concerns driven by recent recreational estimate changes, and other tasks have lowered the near-term priority of further exploring mesh size issues.

The study indicated that the current minimum mesh sizes for summer flounder of 5.5" diamond or 6.0" square do not appear to be equivalent to each other in terms of selectivity. The 6.0" square mesh releases less than 50% of fish at or below the minimum size, and its selectivity appears more similar to a 5.0" diamond mesh. The MC has concerns with the amount of undersized summer flounder caught with the 6.0" square mesh and previously recommended exploration of phasing out the use of 6.0" square mesh to reduce discards of undersized fish. This year, the MC agreed that they still support further exploring these issues and are especially interested in hearing feedback from industry on mesh size use in the summer flounder fishery. They indicated that

[1] Available at: http://www.mafmc.org/s/Tab08_SFSBSB-Mesh-Selectivity-Study-Apr2018.pdf

further evaluation should include: 1) clarifying which vessels or fleets are currently using square mesh, 2) estimating costs to industry from changing mesh sizes, 3) evaluating the biological benefits of phasing out the 6.0" square mesh, and 4) determining if a square mesh regulation is still needed and if there is a more appropriate square mesh equivalent to the 5.5" diamond.

For scup and black sea bass, the study results indicate that a consistent mesh size of either 4.5" or 5.0" could likely be specified for these species. The MC requested additional analyses of the potential biological and economic impacts of a mesh size change for each species, as well as input from industry on the overlap in these fisheries and the current mesh sizes used in the black sea bass fishery.

The MC agreed that pursuing further analyses and gathering Advisory Panel and other industry input for minimum mesh size regulations should still be a priority; however, it may be a lower near-term priority relative to other management issues. The MC will revisit this issue following further evaluation and analysis of potential effects of mesh size changes and input from industry.

## 2020 Recreational Measures

The MC had a brief discussion to plan for setting 2020 recreational measures later this fall. The MC will meet again in mid-November to recommend recreational measures for all three species for consideration at the December Council/Board meeting.

The MC discussed the possibility of exploring new approaches for summer flounder recreational management such as more truly regional measures and/or alternatives to a single minimum size limit (e.g., slot limits or a split size limit). Several MC members expressed support in theory for alternative size limit measures but identified potential difficulties with implementing them in practice. Past analyses have indicated that it would be difficult to constrain harvest under these types of alternative measures without corresponding drastic reductions in season and/or possession limit. New Jersey has been exploring modeling slot limit options, but it would potentially require a very narrow slot (e.g., half an inch), and still require a reduced season. MC members noted that alternatives to large minimum sizes would likely provide more equitable access to fish in different parts of the management unit that have access to different sizes of summer flounder, but increased harvest of smaller summer flounder could have negative biological impacts if it allowed for harvest of smaller fish that have not yet spawned. Overall, the group supported further exploration of these types of management strategies.

GARFO staff clarified that at this time, it is not clear whether or not the final rule for Framework 14 (black sea bass conservation equivalency, slot limits for summer flounder and black sea bass in federal waters, and Block Island transit provisions) will publish in time to use these strategies for 2020. Slot limits can currently be used by individual states in state waters.

For scup and black sea bass, as discussed above, the group acknowledged that depending on the RHLs adopted by the Council and Board and the expected level of harvest in 2020, large recreational harvest reductions for these species are likely to be necessary. The MC discussed the importance of approaching any reductions in an equitable manner, including minimizing regulatory discrepancies between state and federal waters.

**Table 1:** Currently implemented 2019 and interim 2020 black sea bass catch and landings limits and potential 2020 (revised) and 2021 catch and landings limits, based on the SSC's OFL and ABC recommendations and the MC's recommendations for expected discards and management uncertainty. Numbers may not add precisely due to unit conversions and rounding.

| Measure | 2019 and interim 2020 | | 2020 (revised) and 2021, standard ABC approach | | | | 2020 (revised) and 2021, average ABC approach | | | | Basis for 2020 (revised) and 2021 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | | 2021 | | 2020 | | 2021 | | |
| | mil lb | mt | mil lb | mt | mil lb | mt | mil lb | mt | mil lb | mt | |
| **OFL** | 10.29 | 4,667 | 19.39 | 8,795 | 17.82 | 8,083 | 19.39 | 8,795 | 17.68 | 8,021 | SSC recommendations based on stock assessment projections |
| **ABC** | **8.94** | **4,055** | **15.70** | **7,123** | **14.43** | **6,546** | **15.07** | **6,835** | **15.07** | **6,835** | SSC recommendations based on stock assessment projections and Council risk policy |
| **ABC discards** | 1.76 | 799 | 4.51 | 2,046 | 4.15 | 1,882 | 4.33 | 1,964 | 4.33 | 1,964 | Calculated based on the sector-specific discards described below and the requirement that 49% of the landings portion of the ABC be allocated to the commercial fishery and 51% to the recreational fishery |
| **Projected com. discards** | 0.83 | 377 | 3.08 | 1,397 | 2.83 | 1,284 | 2.96 | 1,343 | 2.96 | 1,343 | Calculated based on an assumption that commercial discards would be 20% of commercial catch (2016-2018 avg. proportion based on NEFSC data) |
| **Projected rec. discards** | 0.93 | 422 | 1.43 | 649 | 1.31 | 594 | 1.37 | 621 | 1.37 | 621 | Calculated based on an assumption that recreational discards would be 36% of recreational catch (2016-2018 avg. proportion based on NEFSC data) |
| **Com. ACL** | 4.35 | 1,974 | 8.56 | 3,885 | 7.87 | 3,569 | 8.22 | 3,729 | 8.22 | 3,729 | 49% of ABC landings portion + projected com. discards |
| **Com. ACT** | 4.35 | 1,974 | 8.56 | 3,885 | 7.87 | 3,569 | 8.22 | 3,729 | 8.22 | 3,729 | Set equal to the ACL, no deduction for management uncertainty (staff recommendation) |
| **Com. quota** | **3.52** | **1,596** | **5.48** | **2,488** | **5.04** | **2,285** | **5.26** | **2,387** | **5.26** | **2,387** | Com. ACT minus projected com. discards |
| **Rec. ACL** | 4.59 | 2,083 | 7.14 | 3,238 | 6.55 | 2,973 | 6.85 | 3,106 | 6.85 | 3,106 | 51% of ABC landings portion + projected rec. discards |
| **Rec. ACT** | 4.59 | 2,083 | 7.14 | 3,238 | 6.55 | 2,973 | 6.85 | 3,106 | 6.85 | 3,106 | Set equal to the ACL, no deduction for management uncertainty (staff recommendation) |
| **RHL** | **3.66** | **1,661** | **5.71** | **2,589** | **5.24** | **2,378** | **5.48** | **2,484** | **5.48** | **2,484** | Rec. ACT minus projected rec. discards |

**Table 2:** Black sea bass commercial and recreational landings and dead discards in millions of pounds during 2016-2018 based on values provided by the NEFSC.

| Value | 2016 | 2017 | 2018 | Avg |
|---|---|---|---|---|
| Commercial landings | 2.50 | 3.99 | 3.34 | **3.28** |
| Commercial discards | 1.67 | 2.26 | 1.59 | **1.84** |
| Recreational landings | 13.52 | 12.55 | 8.84 | **11.64** |
| Recreational discards | 3.07 | 3.60 | 2.28 | **2.98** |
| Commercial discards as % of com. catch | 18% | 22% | 20% | **20%** |
| Recreational discards as % of rec. catch | 40% | 36% | 32% | **36%** |

**Table 3:** Currently implemented catch and landings limits for summer flounder for 2020. These measures are identical to those implemented for 2019 and 2021, with the exception of the OFL which varies slightly in each year. The sector-specific catch and landings limits are initial limits prior to any deductions for past overages.

| Measure | 2020 | | Basis |
|---|---|---|---|
| | mil lb | mt | |
| OFL | 30.94 | 14,034 | Stock projections |
| ABC | 25.03 | 11,354 | SSC recommendation for averaged approach with projections sampling from recent 7-year recruitment series |
| ABC Landings Portion | 19.21 | 8,715 | Stock projections |
| ABC Discards Portion | 5.82 | 2,639 | Stock projections |
| Expected Commercial Discards | 2.00 | 907 | 34% of ABC discards portion, based on 2015-2017 average % discards by sector (using new MRIP data) |
| Expected Recreational Discards | 3.82 | 1,732 | 66% of ABC discards portion, based on 2015-2017 average % discards by sector (using new MRIP data) |
| Commercial ACL | 13.53 | 6,136 | 60% of ABC landings portion (FMP allocation) + expected commercial discards |
| Commercial ACT | 13.53 | 6,136 | No deduction from ACL for management uncertainty |
| Commercial Quota | 11.53 | 5,229 | Commercial ACT, minus expected commercial discards |
| Recreational ACL | 11.51 | 5,218 | 40% of ABC landings portion (FMP allocation) + expected recreational discards |
| Recreational ACT | 11.51 | 5,218 | No deduction from ACL for management uncertainty |
| RHL | 7.69 | 3,486 | Recreational ACT, minus expected recreational discards |

**Table 4:** Currently implemented 2019 and interim 2020 scup catch and landings limits and Monitoring Committee recommended 2020 (revised) and 2021 catch and landings limits based on the standard and average ABC approaches.

| Management measure | 2019 and interim 2020 | | 2020 (revised) and 2021 standard ABC approach | | | | 2020 (revised) and 2021 average ABC approach | | | | Basis |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | | 2021 | | 2020 | | 2021 | | |
| | mil lb | mt | mil lb | mt | mil lb | mt | mil lb | mt | mil lb | mt | |
| **OFL** | 41.03 | 18,612 | 41.17 | 18,674 | 35.30 | 16,012 | 41.17 | 18,674 | 35.62 | 16,159 | Assessment projections |
| **ABC** | **36.43** | **16,525** | **35.77** | **16,227** | **30.67** | **13,913** | **33.22** | **15,070** | **33.22** | **15,070** | Assessment projections & risk policy |
| **ABC discards** | 5.08 | 2,304 | 7.03 | 3,190 | 7.26 | 3,295 | 6.53 | 2,963 | 7.85 | 3,560 | Assessment projections |
| **Commercial ACL** | 28.42 | 12,890 | 27.90 | 12,657 | 23.92 | 10,852 | 25.91 | 11,755 | 25.91 | 11,755 | 78% of ABC (per FMP) |
| **Commercial ACT** | 28.42 | 12,890 | 27.90 | 12,657 | 23.92 | 10,852 | 25.91 | 11,755 | 25.91 | 11,755 | Set equal to commercial ACL |
| **Projected commercial discards** | 4.43 | 2,011 | 5.27 | 2,393 | 5.45 | 2,471 | 5.39 | 2,446 | 5.39 | 2,446 | 75% of ABC discards (avg. % of dead discards from commercial fishery, 2009-2018) |
| **Commercial quota** | **23.98** | **10,879** | **22.63** | **10,265** | **18.48** | **8,381** | **20.52** | **9,308** | **20.52** | **9,308** | Commercial ACT minus discards |
| **Recreational ACL** | 8.01 | 3,636 | 7.87 | 3,570 | 6.75 | 3,061 | 7.31 | 3,315 | 7.31 | 3,315 | 22% of ABC (per FMP) |
| **Recreational ACT** | 8.01 | 3,636 | 7.87 | 3,570 | 6.75 | 3,061 | 7.31 | 3,315 | 7.31 | 3,315 | Set equal to recreational ACL |
| **Projected recreational discards** | 0.65 | 293 | 1.76 | 798 | 1.82 | 824 | 1.80 | 815 | 1.80 | 815 | 25% of the ABC discards (avg. % of dead discards from rec. fishery, 2009-2018) |
| **RHL** | **7.37** | **3,342** | **6.11** | **2,772** | **4.93** | **2,237** | **5.51** | **2,500** | **5.51** | **2,500** | Recreational ACT minus discards |