



**Mid-Atlantic Fishery Management Council**  
800 North State Street, Suite 201, Dover, DE 19901  
Phone: 302-674-2331 | FAX: 302-674-5399 | www.mafmc.org  
P. Weston Townsend, Chairman | Michael P. Luisi, Vice Chairman  
Christopher M. Moore, Ph.D., Executive Director

## MEMORANDUM

**Date:** December 1, 2023  
**To:** Council and ASMFC Policy Board  
**From:** Julia Beaty, Council staff  
**Subject:** Recreational Measures Setting Process Framework/Addenda

During their meeting on December 13, 2023, the Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission's Interstate Fisheries Management Program Policy Board (Policy Board) will meet to review progress and discuss next steps on the Summer Flounder, Scup, Black Sea Bass, and Bluefish Recreational Measures Setting Process Framework/Addenda. The Council and Policy Board will be asked to consider a recommendation from the Fishery Management Action Team (FMAT)/Plan Development Team (PDT) to remove the pre-determined measures concept from further consideration, as described in more detail in the summary of the November 2, 2023 meeting listed below.

The following briefing materials are provided behind this tab:

- 1) Action plan
- 2) Summary of the September 19, 2023 meeting of the FMAT/PDT
- 3) Summary of the November 2, 2023 meeting of the FMAT/PDT and Commissioner/Council Member Work Group

During the December 13, 2023 meeting of the Council and Policy Board, staff will also summarize ongoing work by a group of Management Strategy Evaluation modelers to support this action, as well as ongoing work by FMAT/PDT sub-groups.



## Summer Flounder, Scup, Black Sea Bass, and Bluefish Recreational Measures Setting Process Framework/Addenda

### Draft Action Plan

11/28/2023

<https://www.mafmc.org/actions/hcr-framework-addenda>

**Framework/Addenda Goal:** This management action is being developed by the Mid-Atlantic Fishery Management Council (Council) and the Atlantic States Marine Fisheries Commission (Commission). This is a follow-on action to the [Recreational Harvest Control Rule Framework/Addenda](#), which implemented the Percent Change Approach for setting recreational management measures. In adopting the Percent Change Approach, the Council and the Commission’s Interstate Fishery Management Program Policy Board (Policy Board) agreed it should sunset by the end of 2025 with the goal of considering an improved measures setting process, as developed through this management action, starting with 2026 measures.

**Alternatives to be Considered:** During their June 2022 and August 2023 meetings, the Council and Policy Board agreed to further develop the topics summarized below through this management action. They may also identify other alternatives to address the objectives of the action at future meetings.

- **Percent Change Approach** – This approach was implemented starting with the 2023 recreational management measures for summer flounder, scup, and black sea bass. It will also be used for bluefish once that stock is no longer under a rebuilding plan. Under the Percent Change Approach, a determination is made to either liberalize, restrict, or leave measures unchanged based on two factors: 1) Comparison of a confidence interval around an estimate of expected harvest under status quo measures to the average recreational harvest limit (RHL) for the upcoming two years and 2) Biomass compared to the target level, as defined by the most recent stock assessment. These two factors are used to define a target harvest level for setting management measures. The target is defined as a percentage difference from expected harvest under status quo measures. The Percent Change Approach is described in detail in the [reference guide](#) and [final framework document](#) for the previous action. The Council and Policy Board agreed that further development of this approach should, at a minimum, include greater consideration of fishing mortality. This could include development of approaches to assign fishing mortality rates and targets to the recreational fishery.
- **Biological Reference Point Approach and Biological Based Matrix Approach** - These alternatives use a combination of indicators to place the stock in one of multiple potential management measure “bins.” The indicators vary by alternative and include expected harvest under status quo measures, biomass compared to the target level, fishing mortality, recruitment, and/or trends in biomass. Bins associated with poor indicators would have more restrictive management measures and bins with positive indicators would have more liberal measures. Measures would be assigned to all bins the first time the approach is used through the specifications process. These alternatives are described in more detail in the [reference guide](#) and [final framework document](#) for the previous action. The Council and Policy Board agreed that further development of these alternatives should at a minimum include development of example measures using modeling (e.g., the Summer Flounder Management Strategy Evaluation model) or other approaches.

- **Triggers for changing measures** – The Council and Policy Board agreed to consider modified versions of the Biological Reference Point Approach and the Biomass Based Matrix approach where the indicator thresholds defining the boundaries between the bins would be triggers for changing measures, without having measures pre-assigned to the bins.
- **Target metric for setting measures** – The previous framework/addenda considered if recreational measures in state and federal waters should collectively aim to achieve a target level of harvest (e.g., based on the RHL), recreational dead catch (e.g., based on the recreational annual catch limit), or fishing mortality. These alternatives will be further developed through this action.
- **Starting point for measures** – Many recreational stakeholders have expressed frustration that the current measures do not appear to be aligned with stock status. The Council and Policy Board agreed that further consideration should be given to the starting point for measures under all alternatives.
- **Management uncertainty** – The Council and Policy Board agreed that further consideration should be given to the implications of the alternatives for management uncertainty buffers, as currently defined in the Fishery Management Plan.
- **Use of the Summer Flounder Management Strategy Evaluation (MSE) model** – The Council and Policy Board supported the use of the Summer Flounder MSE model to analyze aspects of this management action. For example, it may be used to evaluate the performance of potential indicator thresholds which define the boundaries between management measure bins, the management response to crossing those thresholds, and measures assigned to each management response. Given time constraints, simplifying assumptions will need to be made and example measures are not expected to be generated for every bin under all alternatives.
- **Issue of “borrowing”** – The Council and Policy Board agreed to further consider the issue of “borrowing” as raised by the SSC. During their review of the Harvest Control Rule Framework/Addenda, the SSC noted, “If constraining one sector is more challenging, and leads to larger deviations from the specified catch targets, the patterns of allocation may be substantially different to those specified in the policy. This can lead to effective ‘borrowing’ of quota from the more controlled sector, and thus to increased levels of contention in the fishery management process.”<sup>1</sup>
- **Other alternatives** – This action may consider other alternatives, as appropriate. For example, this could include potential revisions to the accountability measures, considerations related to conservation equivalency, and other topics.

### **Fishery Management Action Team (FMAT) / Plan Development Team (PDT)**

An FMAT/PDT has been formed to assist with development and analysis of potential alternatives. FMAT/PDT members are listed in the table below. Other Council, Commission, and NOAA Fisheries staff, as well as other experts, will be consulted as needed.

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<sup>1</sup> The report of the SSC review of the Harvest Control Rule Framework/Addenda available at <https://www.mafmc.org/ssc-meetings/2022/may10-11>.

| <b>FMAT/PDT Member Name</b> | <b>Agency</b>                                     | <b>Role/Expertise</b>                                             |
|-----------------------------|---------------------------------------------------|-------------------------------------------------------------------|
| Tracey Bauer                | Atlantic States Marine Fisheries Commission       | FMAT/PDT Co-Chair                                                 |
| Julia Beaty                 | Mid-Atlantic Fishery Management Council           | FMAT/PDT Co-Chair                                                 |
| Chelsea Tuohy               | Atlantic States Marine Fisheries Commission       | FMAT/PDT Co-Chair                                                 |
| Mike Celestino              | New Jersey Department of Environmental Protection | Technical analysis and state management                           |
| Alexa Galvan                | Virginia Marine Resources Commission              | Technical analysis and state management                           |
| Emily Keiley                | NMFS Greater Atlantic Regional Fisheries Office   | Fisheries policy and legal requirements                           |
| Marianne Randall            | NMFS Greater Atlantic Regional Fisheries Office   | National Environmental Policy Act requirements                    |
| Scott Steinback             | Northeast Fisheries Science Center                | Recreational fisheries economist                                  |
| Rachel Sysak                | New York Department of Environmental Conservation | Technical analysis and state management                           |
| Corinne Truesdale           | Rhode Island Department of Fish and Wildlife      | Technical analysis and state management                           |
| Sam Truesdell               | Northeast Fisheries Science Center                | Stock assessments                                                 |
| Sara Turner                 | NMFS Greater Atlantic Regional Fisheries Office   | Scientific and technical analysis of federal fisheries management |

### **Commissioner/Council Member Work Group**

The Council and Policy Board established a small group of Commissioners and Council members to act as a liaison between the PDT/FMAT and the Policy Board. The purpose of the Work Group is to guide the FMAT/PDT on the intent of the Council and Policy Board, not to develop new options/alternatives. This group will periodically meet with the PDT/FMAT. Work Group members are listed below.

| <b>Work Group Member Name</b> | <b>Council Member or Commissioner</b> |
|-------------------------------|---------------------------------------|
| Skip Feller                   | Council member                        |
| Jason McNamee                 | Commissioner                          |
| Nichola Meserve               | Commissioner                          |
| Adam Nowalsky                 | Both                                  |
| Paul Risi                     | Council member                        |

**Draft Timeline** – *Subject to change*

|                                 |                                                                                                                                                                                                                           |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>May 2023</b>                 | <ul style="list-style-type: none"> <li>• Fishery Management Action Team (FMAT)/Plan Development Team (PDT) formed.</li> </ul>                                                                                             |
| <b>Summer 2023</b>              | <ul style="list-style-type: none"> <li>• FMAT/PDT meetings.</li> <li>• Council and Policy Board meeting to review progress and discuss next steps.</li> </ul>                                                             |
| <b>Fall 2023</b>                | <ul style="list-style-type: none"> <li>• FMAT/PDT and Council/Commissioner work group meetings to continue development of alternatives.</li> <li>• AP meeting to review progress and provide input.</li> </ul>            |
| <b>December 2023</b>            | <ul style="list-style-type: none"> <li>• Council and Policy Board meeting to review progress and discuss next steps</li> </ul>                                                                                            |
| <b>Early 2024 - Summer 2024</b> | <ul style="list-style-type: none"> <li>• FMAT/PDT and Council/Commissioner work group meetings to continue development of alternatives and develop draft document for public hearings.</li> </ul>                         |
| <b>August 2024</b>              | <ul style="list-style-type: none"> <li>• Council and Policy Board meeting to approve final range of alternatives and approve draft document for public hearings through Commission process</li> </ul>                     |
| <b>Fall 2024</b>                | <ul style="list-style-type: none"> <li>• Public hearings</li> </ul>                                                                                                                                                       |
| <b>Late 2024/Early 2025</b>     | <ul style="list-style-type: none"> <li>• FMAT/PDT and AP meetings to provide input to Council and Policy Board prior to final action.</li> </ul>                                                                          |
| <b>April 2025</b>               | <ul style="list-style-type: none"> <li>• Council and Policy Board meeting for final action.</li> </ul>                                                                                                                    |
| <b>Spring-December 2025</b>     | <ul style="list-style-type: none"> <li>• Development, review, and revisions of framework/addenda documents.</li> <li>• Federal rulemaking.</li> <li>• MC/TC use new process to set 2026 recreational measures.</li> </ul> |
| <b>Late 2025 or early 2026</b>  | <ul style="list-style-type: none"> <li>• Effective date of implemented changes.</li> </ul>                                                                                                                                |

**Summer Flounder, Scup, Black Sea Bass, and Bluefish  
Recreational Measures Setting Process  
Fishery Management Action Team (FMAT)/Plan Development Team (PDT)  
Webinar Meeting Summary  
September 19, 2023**

**FMAT/PDT Attendees:** Tracey Bauer (ASMFC), Julia Beaty (MAFMC), Mike Celestino (NJ DEP), Alexa Galvan (VMRC), Emily Keiley (GARFO), Marianne Randall (GARFO), Scott Steinback (NEFSC), Rachel Sysak (NJ DEC), Corinne Truesdale (RI DEM), Sara Turner (GARFO)

**Other Attendees:** Kiley Dancy (MAFMC staff), Geret DePiper (NEFSC), Greg DiDomenico (Lund's Fisheries, Council AP member), Skip Feller (Council member), Sara Gaichas (NEFSC), Jesse Hornstein (Commissioner), Jason McNamee (Commissioner), Adam Nowalsky (Commissioner/Council member), Paul Risi (Council member), Kamran Walsh, Mike Waine (American Sportfishing Association, Council AP member)

***Overview***

The Recreational Measures Setting Process FMAT/PDT reviewed the fishery and stock status indicators, associated thresholds, and resulting management responses for the alternatives developed for the Harvest Control Rule Framework/Addenda and carried forward for further development through this action. The goal of the discussion was to determine if changes are needed and plan for analysis of the alternatives using the Summer Flounder Management Strategy Evaluation (MSE) model. The MSE modelers emphasized the need for feedback from the FMAT/PDT on how to narrow down or consolidate what will be tested in the MSE model, focusing on decision points that are likely to affect overall performance of the alternatives.

***General comments and suggestions***

- The FMAT/PDT agreed that the relationship between accountability measures and the management responses should be considered when developing the MSE analysis.
- An FMAT/PDT member expressed interest in testing the outcomes of continuing to use the approaches defined by the alternatives after a stock is under a rebuilding plan as opposed to setting measures based on the recreational harvest limit (RHL). The MSE modelers said it would be difficult to test rebuilding RHLs with the MSE, as rebuilding RHLs for stocks not currently under rebuilding plans would not be known.
- Several FMAT/PDT members recommended consideration of incorporating fishing mortality rate (F) reference points in the Biomass Based Matrix Approach and the Biological Reference Point Approach, in addition to the Percent Change Approach.

***Indicator Thresholds***

- 1) Harvest vs. RHL (Percent Change Approach)
  - The FMAT/PDT recommends to continue to use the 80% confidence interval (CI) and two-year average RHL for the purposes of the MSE analysis.
  - The FMAT/PDT expressed support for considering using the recreational annual catch limit (ACL) instead of the RHL to include consideration of discards.

- The FMAT/PDT discussed incorporating F-based reference points in the Percent Change Approach as directed by the Council and Policy Board. Given that much additional discussion is needed to define recreational F-based reference points, the FMAT/PDT decided to create a sub-group to further discuss this. It was suggested that a comparison of the ACL vs projected catch could be used instead of F. Regardless of how the alternatives are configured, the MSE can evaluate the impacts of the alternatives on the overall fishing mortality rate.
- 2)  $SSB/SSB_{MSY}$
- The group agreed to add a <50% bin (i.e., overfished status) to the Percent Change Approach for purposes of the MSE analysis. This would not necessarily represent a fundamental change in the alternative and would provide some consistency with the other alternatives for the sake of analysis.
  - The FMAT/PDT recommended no changes to the biomass indicator thresholds as currently defined, noting that they are modeled on the Council's risk policy. The Council's risk policy has been analyzed through other MSEs.
  - One FMAT/PDT member observed there are categories for if the stock is at high biomass (from 100% to 150% of the target level) and low biomass (50% to 100% of the target level), which separates stocks that are near the target level into those two categories. This FMAT/PDT member suggested considering adding a category for when a stock is near  $SSB_{MSY}$ . However, the MSE modelers cautioned that the analysis will become more complex as more indicator categories are added.
  - The group discussed the idea of incorporating uncertainty in the  $SSB/SSB_{MSY}$  ratio when defining the three biomass categories (e.g., significantly less than 1, not different from 1, and significantly greater 1).
- 3)  $F/F_{MSY}$
- The FMAT/PDT recommends no change to the thresholds for this indicator for the purposes of testing though the MSE model.
- 4) Recent harvest vs. RHL (Biological Reference Point Approach)
- The FMAT/PDT recommends comparing forward projected total catch vs. ACL in place of recent harvest vs. RHL. However, it was noted that this indicator as currently defined is similar to the current accountability measures. Projected future values may require further consideration of how accountability measures are addressed under this alternative.
- 5) Recruitment
- The FMAT/PDT recommends maintaining the recruitment indicator threshold as is.
- 6) Biomass trend
- The biomass trend is defined by comparing the average percent change in spawning stock biomass from the most recent three years in the stock assessment to a pre-defined threshold value. The FMAT/PDT recommends testing a 4% threshold as a middle ground of three previously analyzed thresholds (i.e., 3%, 4%, and 5%). Based on a previous analysis, 4% seemed to provide reasonable categorization of stable, increasing, or decreasing biomass. The group also discussed the idea that an MSE will have trouble

distinguishing outcomes from very similar thresholds (3 vs 4 vs 5%). The group acknowledged we can't test everything through the MSE and this was a reasonable place to deprioritize testing.

### **Management Responses**

#### *Percent Change Approach*

- The Council and Policy Board tasked the FMAT/PDT with re-evaluating the required percent changes in harvest in the Percent Change Approach. The 10/20/40% were originally based on how MRIP data performed; however, the Recreational Demand Model is now available and could be used to re-evaluate these percentages.
- Currently, if a stock is in the Very High biomass category, the Percent Change Approach has options for liberalizing or reducing, but no status quo option. An FMAT/PDT member suggested analyzing an additional option where the 10% reduction on the bottom row of the Percent Change Approach would instead be status quo. Another FMAT/PDT member said accountability measures could address concerns about the potential for large overages under a status quo approach. For example, status quo could be allowed unless an accountability measure is triggered, in which case a change would be required.
- An MSE modeler advised that the Percent Change Approach management responses would need to be simplified when it is tested using the MSE model by removing the "not to exceed" language. This would allow for a more substantial difference across the thresholds in this alternative when tested. In addition, the MSE model can be set up to compare each management response to not making these changes in management, and so by default, there will be comparisons with status quo for all of them. This approach was supported by the FMAT/PDT.
- An FMAT/PDT member suggested that after some testing is completed using the MSE model, the FMAT/PDT can look into how the AMs would factor in. For example, the FMAT/PDT may determine that some overage could be allowed, unless the AMs are triggered, and then managers would be required to make a change.

#### *Biological Reference Point Approach and Biomass Based Matrix Approach*

- To simplify these two alternatives for the purposes of analysis with the MSE model, several FMAT/PDT members and an MSE modeler supported using percent changes in catch or harvest instead of pre-defined measures for each bin. This would make analysis of the binned approaches using the MSE model more straightforward. One FMAT/PDT member suggested modifying the alternatives themselves to remove the pre-defined measures and consider a new approach as it will be very challenging to pre-define measures for all bins for all stocks.

### **Timelines**

The RMS FMAT/PDT and MSE modelers agreed to hold check-in meetings in the upcoming months. Around May 2024, the FMAT/PDT will assess the results so far from the MSE analysis and determine if additional analyses are necessary.

### **Public Comment**

A member of the Commissioner and Council Member Work Group provided background on the 10% minimum thresholds in the Percent Change Approach. A 10% minimum threshold to either reduce or



liberalize harvest was chosen because it was thought a reduction or liberalization of less than 10% would likely not be meaningful given the uncertainty in MRIP data.

A member of the public said the recently announced results of a preliminary study evaluating effort in the MRIP Fishing Effort Survey<sup>1</sup> highlights the importance of the work on this management action.

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<sup>1</sup><https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-announces-large-scale-study-its-recreational-fishing-effort-survey>

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Recreational Measures Setting Process  
Fishery Management Action Team (FMAT)/Plan Development Team (PDT) and  
Commissioner/Council Member Work Group  
Webinar Meeting Summary  
November 2, 2023**

**FMAT/PDT attendees:** Tracey Bauer (ASMFC), Julia Beaty (MAFMC), Alexa Galvan (VMRC), Emily Keiley (GARFO), Marianne Randall (GARFO), Scott Steinback (NEFSC), Rachel Sysak (NJ DEC), Corinne Truesdale (RI DEM), Sam Truesdell (NEFSC), Chelsea Tuohy (ASMFC), Sara Turner (GARFO)

**Commissioner/Council member work group attendees:** Skip Feller, Adam Nowalsky, Paul Risi

**Other attendees:** Rick Bellavance, Frank Blount, Wes Townsend, Mike Waine

**Overview**

The FMAT/PDT met with the Commissioner/Council Member Work Group to review progress to date on the Recreational Measures Setting Process Framework/Addenda and to discuss several topics for further development.

**F-based approaches**

The Council and Policy Board previously tasked the FMAT/PDT with developing recommendations for how to incorporate a comparison of a recreational fishing mortality rate (F) to a recreational fishing mortality rate target when determining whether measures should be adjusted.

Staff noted a few potential challenges, including that management does not currently use or assign fishing mortality rates or targets for the recreational sector and currently available analysis tools, including the Recreation Demand Model, are not configured to predict F in upcoming years based on specified measures. An FMAT/PDT sub-group has been formed to further discuss these issues.

A member of the Commissioner/Council Member Work Group advised the FMAT/PDT that any concerns about the viability of an alternative should be brought to the Policy Board and Council's attention as soon as possible. This can help prevent the FMAT/PDT from spending too much time on topics that are ultimately not feasible.

A member of the FMAT/PDT requested clarification from the Commissioner/Council Member Work Group on the expected advantages of an F-based approach compared to the comparison of expected harvest vs recreational harvest limit (RHL) currently used in the Percent Change Approach. This information would assist the FMAT/PDT in assessing the viability of implementing an F-based approach. A member of the Commissioner/Council Member Work

Group explained that Commissioners and Council members are looking for ways to make decisions on recreational management measures without having to constantly adjust measures based on the RHL compared to recreational harvest estimates from the Marine Recreational Information Program (MRIP), which can be variable and uncertain. An F-based approach would instead be focused on controlling fishing mortality, placing a greater emphasis on conservation and improving access to the resource.

A member of the FMAT/PDT noted the Management Strategy Evaluation (MSE) modelers would be able to test the relative performance of alternatives using an F-based approach. Although assumptions would need to be made, this analysis may be able to provide information on the validity of an F-based approach given currently available data. Further discussion with the MSE modelers is needed to understand the capabilities of the MSE model to assist with this analysis.

### **Pre-determined measures**

Two alternatives currently under consideration (i.e., the Biological Reference Point Approach and the Biomass Based Matrix Approach) would define a range of management measure “bins,” with measures assigned to all bins the first time the approach is used through the specifications process. The intent was that pre-determined measures would make the measures setting process more transparent, by communicating what the measures would be if a species moved to a new bin. However, there are several challenges with this approach, which were reiterated by the FMAT/PDT during this meeting. For example, they expressed concern with the feasibility of assigning measures to bins associated with very different fishery and stock conditions than current conditions, as well as concerns about the amount of analysis that would be needed to develop measures for all bins.

A member of the Commissioner/Council Member Work Group confirmed that the Council and Policy Board were previously interested in pre-determined measures, but recognizes this remains a challenge. He reiterated that the FMAT/PDT should inform the Council and Policy Board as soon as possible if they recommend removing pre-determined measures or any other aspect of this action from further consideration.

### **The FMAT/PDT unanimously agreed to recommend to the Policy Board and Council to remove the pre-determined measures concept from further consideration in this action.**

Without pre-determined measures, the Biological Reference Point and Biomass Based Matrix alternatives could still use the same indicator thresholds to define the management bins. Movement from one bin to another would require a change in measures; however, the specific measures would not be pre-defined. The FMAT/PDT will further consider how measures should change when the stock moves from one bin to another, for example, based on a percentage change in harvest or based on a different target.

### **Management uncertainty**

Under the current management process, annual catch targets (ACTs) can be set less than or equal to the annual catch limits to account for management uncertainty. Management uncertainty buffers have the effect of reducing the ACT, and therefore the RHL. The group briefly discussed how management uncertainty buffers should be thought about in the context of the alternatives under consideration through this action given that the RHL is just one piece of information used to set measures under the alternatives.

A member of the Commissioner/Council Member Work Group suggested consideration of ways that management uncertainty could move in “both directions” (i.e., allowing measures to be either more restrictive or more liberal than they would otherwise be, depending on the circumstances). He said there could be circumstances when uncertainty would call for more liberal measures, for example if recent data show very high harvest that does not seem reasonable in the context of recent effort, weather conditions, or other expectations for upcoming years. He noted that although management uncertainty cannot currently go in either direction, there may be other ways to incorporate these concepts into the alternatives.

One FMAT/PDT member said although he understood the intent of this suggestion, it would be hard to quantify those considerations. He also expressed concern that this could complicate how the Recreational Demand Model is used to set measures.

Another FMAT/PDT member noted that the Bluefish Monitoring Committee recently developed a management uncertainty tool which could be adapted for other species. The tool uses both quantitative and qualitative categories to evaluate management uncertainty. This has not yet been used in the bluefish specifications process, but may be considered in future years.

### **Other**

An FMAT/PDT member requested that the group consider how the alternatives will be compared and described in the framework/addenda. For example, analysis and comparison across alternatives is needed to meet the requirements of the National Environmental Policy Act. The FMAT/PDT will discuss this topic in more detail at a later date once the alternatives have been further developed.

### **Public comment**

A member of the public asked if the FMAT/PDT will consider not partitioning F into recreational and commercial components, but instead using total F as estimated by the most recent assessment. Staff responded that a subgroup of the FMAT/PDT will examine the issue of F-based approaches more in depth, including the feasibility of partitioning F.