



Summer Flounder Amendment

Scoping Comments Summary



December 9, 2014

Baltimore, MD

Amendment Purpose

- Comprehensive review of FMP for summer flounder
- Update the FMP goals and objectives for summer flounder
- Review and update management strategies and measures



Progress to Date

- December 2013: Amendment initiated
- August 2014: Council/Board approve scoping document
- September/October 2014: Scoping hearings and comment period



Scoping Process

- Early public input process to inform scope of issues and development of range of alternatives
- Written comment period (9/16/14 - 10/31/14)
- 14 scoping hearings, MA to NC



Today's Objectives

- Joint Council/Board review of summer flounder amendment scoping comments
- Identify priority issues for further consideration in the amendment



Scoping Hearings

- ~200 people total attendance

Hearing	Approx. # people
MA	12
RI	25
CT	7
NY (Montauk)	34
NY (East Setauket)	20
NY (Brooklyn)	8
NJ (Belmar)	20

Hearing	Approx. # people
NJ (Somers Point)	30
DE	1
MD	13
DC	2
VA	14
NC	16
Web	2

Written Comments

- 100 written comments received
- All states represented
- Greatest representation from New Jersey and New York



Overview: All Comments

- Most frequently raised issues:
 - 60/40 commercial/recreational allocation
 - Commercial quota allocation strategies
 - Commercial landings flexibility
 - Recreational regulatory discards
 - Recreational measures & regional conservation equivalency
 - High discards in both sectors



FMP Goals & Objectives

- FMP lacks social/economic objectives
- Biological objectives are outdated (too focused on rebuilding/overfishing)

FMP Goals and Objectives	Written Comments Received
Should be re-evaluated and/or revised	8
One or more current objectives should be maintained	4



FMP Goals & Objectives

- “The plan has largely been driven and shaped by stock rebuilding requirements, without much attention to economic considerations.”
- “...focus less on overfishing and more on sustainability.”
- “...goals and objectives [...] have different implications for the commercial and recreational sectors.”



Commercial/Recreational Allocation

- Split opinions on maintaining vs. reconsidering current 60/40 allocation
- Those favoring reconsideration also split on how to modify

Commercial/Recreational Allocation	Written Comments Received
Supports current 60/40 commercial/recreational split	25
Opposes current 60/40 split or supports re-evaluation	18



Commercial/Recreational Allocation

- “The 60/40 allocation should remain intact. It’s based on historical landings.”
- “A more equitable allocation would be, at a minimum, 50% commercial and 50% recreational.”
- “If any reallocation is even discussed, maybe the quota should be 70/30 commercial/recreational.”



Commercial Management

- Major themes:
 - Landings flexibility
 - Commercial quota allocation strategies
 - General satisfaction/dissatisfaction with commercial measures
 - Re-evaluation of permit qualifications
- Opinions generally divided on all of the above



Commercial Management

Commercial Issues	Written Comments Received
Supports landings flexibility	13
Opposes landings flexibility	16
Current state-by-state quotas should not be changed	18
Reconsider allocation strategies (e.g., revised state-by-state, coastwide, regional, scup seasonal model)	13

Commercial Management

- “The ASMFC & MAFMC should make it their priority to adopt a landings flexibility policy.”
- “If you have the money and interest in purchasing an out of state Fluke permit, then you need to land and sell the fish in that state.”



Commercial Management

- “Please keep the status quo for state-by-state quotas.”
- “State-by-state quota allocation was based on erroneous miscalculated information...”
- “...alternate models for catch (utilizing a scup model with two periods for coastwide followed by one state season) or coastwide year-round should be assessed.”



Recreational Management

- Major themes:
 - High recreational catch:keeper ratio (high regulatory discards) should be addressed
 - Current bag/size/season combination is not optimal
 - Regional conservation equivalency (split opinions)
 - Concern with commercial vs. recreational size discrepancy



Recreational Management

Recreational Issues	Written Comments Received
Dissatisfied with high catch: keeper ratio (high regulatory discards)	25
Current bag/size/season combination is not optimal	24
Concerned with different regulations in shared waters	11
Concerned with recreational vs. commercial size limit discrepancy	10



Recreational Management

- "...have to catch anywhere from 75 to 150 fish in order to catch eight 18-inch keepers. If we had a 16-inch fish size limit, we would catch our 5 fish limit and go home in a couple of hours."
- "I am a beach fisherman from N.J., so far this summer I've caught 118 fluke, only 2 were keepers."
- "My ratio of keepers to shorts was one in ten."

Recreational Management

- “Regional management [...] increased yield to the customer and resulted in more of a season for the fishermen, and it’s worked out very well.”
- “It’s a travesty that regionalization was forced upon New Jersey [...] all it did was shift the problem from the Hudson River to the Delaware Bay.”

Recreational Management

- "...willing to reduce the bag limit, while lowering the minimum size."
- "[It's] important that people that fish have a chance to take home dinner as part of the experience."

Discards

- “The waste of discarded fish should be stopped or minimized.”

Discards	Written Comments Received
Concerned with high rec. discards (including regulatory)	22
Concerned with high comm. discards (including regulatory)	15



Discards

- “Commercial discards are a big problem. [...] If commercial fishermen were allowed to catch and keep anything that they could sell, it would be much better.”
- “We’re almost killing as many fish by catch and release mortality as we are by landings.”



Data & Science

Data & Science	Written Comments Received
Dissatisfied with MRIP/recreational data	11
Need better economic data	2
Concerned w/ timing of fishery data/assessment	3
Better science is needed	6



Data & Science

- “It’s frustrating for the general public to try to make sense of how MRIP is better than before.”
- “The system ignores external data such as boat registration, tackle sales, and decrease in for-hire vessels.”
- “The Council and Commission should do everything in their power to improve the quality, reliability, and especially the credibility of the science used.”



Ecosystem, Habitat, Forage

- Some comments supporting:
 - Increased consideration for forage species
 - Habitat restoration, protection, creation
 - Addressing water quality issues
 - Consideration of species interactions

General & Other Issues

- Concerns about enforcement/illegal landings
- Management does not represent interests of general public
- Concerns with rising costs (e.g., fuel)
- RSA



From Council and Board

- Identify general priority issues to be further addressed in amendment process



Next Steps

- FMAT meetings
- Plan for forming working groups
- Further define and expand on issues identified
- Further development with FMAT, Council/Board, Working Groups



MRIP Considerations

- Changes in MRIP effort estimation methodology
 - Coastal Household Telephone Survey → mail survey
 - Long calibration/rollout process
 - Consider how this will impact discussions of recreational issues and allocation issues

Questions



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