Dr. John Boreman, Chairman  
Scientific and Statistical Committee (SSC)  
Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE  19901

RE: 2016 Summer Flounder ABC Specifications

Dear Dr. Boreman:

As you are aware, the June 29, 2015 Stock Assessment Update of Summer Flounder for 2015 and the July 9, 2015 Staff Recommendations for the 2016-2018 Summer Flounder Management Measures speak of retrospective biases and below average recruitment for years 2010 through 2013. The document cites these concerns in recommending a 45% reduction to the summer flounder Allowable Biological Catch (ABC) in 2016. It is the opinion of the Recreational Fishing Alliance (RFA) that implementing such a reduction in one year is not an appropriate management response in light of the rebuilt status of the summer flounder stock and encouraging signs from the fall 2014 and spring 2015 surveys in regards to strong recruitment numbers. In addition, the socioeconomic impacts of a 45% reduction of the summer flounder over one year would be catastrophic and unnecessary. With that said, the RFA encourages the SSC to consider the following points when setting the 2016-2018 ABC specifications.

- The Summer flounder stock is fully rebuilt and fluctuations in recruitment and/or SSB are to be expected. The condition of the summer flounder stock does not demand reactionary or drastic modifications to the ABC.

- Below average recruitment in years 2010-2013 is the result primarily of environmental conditions and is the cause of the dip in summer flounder SSB not fishing pressure.

- The SSC should provide the Demersal Committee with ample opportunity to prescribe the level of risk they deem appropriate for this fishery by putting forward a SSC recommendation with the broadest ABC range possible.

- The 2014 year class is of average size and preliminary information in regards to the 2015 year class indicates that it will likely be above average. As these stronger year classes move into the fishery beginning in 2016, SSB will increase even under status quo conditions.

- Maintaining the 2015 ABC through 2018 or the next benchmark stock assessment is a rationale and appropriate recommendation.
The Summer Flounder stock assessment receives the most money, resources, and data in the mid-Atlantic region and yet is only a level 3. SSC members should be conscious of the impact that limited budgets have on the ability to move assessments to levels of greater confidence and lower uncertainty and not punish the fishermen for the lack of resources to improve assessments.

The RFA hopes the SSC members consider these points and the tremendous importance of the summer flounder fishery when deliberating the 2016 through 2018 ABC recommendation. Based on the progress made in the summer flounder fishery in terms of rebuilding and reductions to fishing mortality, in addition to the current SSB status, it is extremely difficult to justify a significant reduction to the ABC for 2016 through 2018. That said, the RFA would support an ABC recommendation of 22 million pound quota for the period of 2016 through 2018. If reductions are necessary, the RFA hopes the SSC can develop a recommendation with a broad, multi-year range of ABC’s to provide the Committee the opportunity to develop 2016 through 2018 specifications based on the level of risk they determine to be appropriate for this rebuilt fishery.

Sincerely,

Jim Donofrio
Executive Director