

LEGISLATIVE: (from page 27)

Reallocation

The REALLOCATION process between commercial and recreational quotas is being handled through a joint ASMFC and MAFMC process and is described in a Public Hearing document that can be found at:

https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/6001c6c286623f3e4eac49dd/1610734740810/SFSBSB-Alloc-Am-PHD_Jan2021.pdf

Comments on this process are due by March 16, 2021.

Injustice to Recreational Quota

I have written a past newsletter article on this process and I feel that it is a critical move to undo a major injustice that was done to recreational fishing by the updates made to the **Marine Recreational Information Program (MRIP)** recently.

These changes resulted directly in the increase of commercial quotas for fluke by 49% in 2019 and for black sea bass in 2020 by 51%.

This is because the new MRIP estimates increased the recreational landings estimates over the last 25 years by up to double of the previous estimates.

This was without any new fishery data, but just the result of different estimating procedures. The higher landings estimates then led fisheries managers to conclude that there were more fish in the sea than thought, so landings could increase.

I say that it is the same ocean over the last 25 years; just changing estimates didn't change the ocean, why should landings be allowed to increase so substantially?

The result is that greatly increased commercial pressure on fluke and black sea bass has led to fewer fish for recreational fishers to catch (and fewer fish for commercials too because of greater fishing pressure).

The issue is further complicated because the allocation between commercial and recreational allowable catch (i.e.: 60/40 for fluke) was set based on historic catch amounts where recreational catch was estimated using the old approach.

Fisheries managers could change the quotas as they did, but no adjustment of the commercial/ recreational allocation could be made because allocation percentages are set in the last full Amendment and therefore require this long process of filing an amendment (this is the process that ASMFC & MAFMC are doing now).

This reallocation is needed just to put the balance back into the percentage allocations that were originally established.

PID options to support

As far as options in the Public Hearing document, here are my thoughts:

I think reallocation should be calculated on a "**Catch Basis**." This is so that any commercial/ recreational split of quota is done before dead discards are subtracted.

By making the split in this way it puts more incentive on each sector to create accurate estimates of discard mortality and reduce that mortality to the greatest extent possible within their own sector.

I think that allocation should be based on more recent years than the original allocation years.

Here are the options:

Summer Flounder Allocation Alternatives (Table 2)

Summer Flounder Catch-Based Allocation Percentages	
Alternative	Basis (see Appendix B for details)
1a-1: 44% commercial, 56% recreational	2004-2018 base years
1a-2: 43% commercial, 57% recreational	Supported by multiple approaches: 2009-2018 base years, approximate status quo harvest per sector compared to 2017/2018, and average of other approaches approved by Council/Board in June 2020
1a-3: 40% commercial, 60% recreational	2014-2018 base years
Summer Flounder Landings-Based Allocation Percentages	
Alternative	Basis (see Appendix B for details)
1a-4: 60% commercial, 40% recreational	No action/status quo (1980-1989)
1a-5: 55% commercial, 45% recreational	Same base years, new data (1981-1989; 1980 data unavailable)
1a-6: 45% commercial, 55% recreational	Multiple approaches: 2004-2018 and 2009-2018 base years
1a-7: 41% commercial, 59% recreational	2014-2018 base years

Scup Allocation Alternatives (Table 3)

Scup Catch-Based Allocation Percentages	
Alternative	Basis (see Appendix B for details)
1b-1: 78% commercial, 22% recreational	No action/status quo
1b-2: 65% commercial, 35% recreational	Same base years, new data (1988-1992)
1b-3: 61% commercial, 39% recreational	Multiple approaches: 2009-2018 base years and average of other approaches approved by Council/Board in June 2020
1b-4: 59% commercial, 41% recreational	Approximate status quo harvest per sector compared to 2018/2019
Scup Landings-Based Allocation Percentages	
Alternative	Basis (see Appendix B for details)
1b-5: 57% commercial, 43% recreational	Multiple approaches: Same base years, new data; 2014-2018 base years; 2009-2018 base years
1b-6: 56% commercial, 44% recreational	2004-2018 base years
1b-7: 50% commercial, 50% recreational	Approximate status quo harvest per sector compared to 2018/2019

Black Sea Bass Allocation Alternatives (Table 4)

Black Sea Bass Catch-Based Percentages	
Alternative	Basis (see Appendix B for details)
1c-1: 32% commercial, 68% recreational	Approximate status quo harvest per sector compared to 2018/2019
1c-2: 28% commercial, 72% recreational	2004-2018 base years
1c-3: 24% commercial, 76% recreational	2009-2018 base years
Black Sea Bass Landings-Based Percentages	
Alternative	Basis (see Appendix B for details)
1c-4: 49% commercial, 51% recreational	No action/status quo
1c-5: 45% commercial, 55% recreational	Same base years, new data (1983-1992)
1c-6: 29% commercial, 71% recreational	Multiple approaches: Approximate status quo harvest per sector compared to 2018/2019 and average of other approaches approved by Council/Board in June 2020
1c-7: 22% commercial, 78% recreational	2009-2018 and 2014-2018 base years

I believe that for **fluke**, we should support option 1a-2 or 1a-3. Since **option 1a-2** is "supported by multiple approaches" I would default to that option.

On the same basis I believe that we should support **option 1c-3 for black sea bass** since it is based on the 10 most recent years of catch data.

And for **scup** we should support **option 1b-3** since it too is based on multiple approaches according to the Public Hearing Document.

As far as Phase in (see actual PID), I believe there should be no Phase in period as is **alternative 1d-1**. This action basically reverses unjust increases in fluke and black sea bass commercial quotas that were put in place in 2019 and 2020 respectively. Those quota increases were not Phased in, therefore there is no need to Phase in these changes.

On quota transfers, I am concerned that transfers of fish not harvested by recreational fishers because they are releasing fish unharmed could go to commercial fishers who will harvest these fish rather than allowing the fish to remain in the environment where they could increase fish abundance. For this reason, I would have to support **alternative 2a: No Action/ Status Quo**.

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