Atlantic States Marine Fisheries Commission

ISFMP Policy Board

November 12, 2026
8:00– 11:00 a.m.

Draft Agenda

The times listed are approximate; the order in which these items will be taken is subject to change; other items may be added as necessary

1. Welcome/Call to Order *(D. McKiernan)* 8:00 a.m.

2. Board Consent 8:00 a.m.
   - Approval of Agenda
   - Approval of Proceedings from May 2026

3. Public Comment 8:05 a.m.

4. Executive Committee Report *(D. McKiernan)* 8:15 a.m.

Joint Discussion with the MAFMC

5. Discuss Sector Separation Amendment Stakeholder Workshop Results (*T. Bauer, C. Tuohy, K. Dancy*) **Possible Action** 8:25 a.m.
   - Provide Direction to the PDT/FMAT on Amendment Options

6. Update on the Marine Recreational Information Program Fishing Effort Survey Estimates (*K. Papacostas)* 9:55 a.m.

7. Update on Recreational Angler Partnership Improvement Directive (*A. DiJohnson*) 10:25 a.m.

8. Committee Reports 10:35 a.m.
   - Habitat Committee (*S. Kaalstad*)
   - Atlantic Coast Fish Habitat Partnership (*S. Kaalstad)*
   - Law Enforcement Committee (*K. Blanchard*)

9. Stock Assessment Updates (*K. Drew*) 10:50 a.m.

10. Review Noncompliance, If Necessary **Action** 10:55 a.m.

11. Other Business/Adjourn 11:00 a.m.

The meeting will be held at The Viking (One Bellevue Avenue, Newport, RI; 401.847.330) and via webinar; click here for details.

Sustainable and Cooperative Management of Atlantic Coastal Fisheries

MEETING OVERVIEW

ISFMP Policy Board
Thursday November 12, 2026
8:00 – 11:00 a.m.

Chair: Dan McKiernan (MA) Assumed Chairmanship: 10/25	Vice Chair: Doug Haymens (GA)	Previous Board Meetings: August 6, 2026
Voting Members: ME, NH, MA, RI, CT, NY, NJ, PA, DE, MD, DC, PRFC, VA, NC, SC, GA, FL, NMFS, USFWS (19 votes)		

2. Board Consent

- Approval of Agenda
- Approval of Proceedings from August 2026

3. Public Comment – At the beginning of the meeting public comment will be taken on items not on the agenda. Individuals that wish to speak at this time must sign-in at the beginning of the meeting. For agenda items that have already gone out for public hearing and/or have had a public comment period that has closed, the Board Chair may determine that additional public comment will not provide additional information. In this circumstance the Chair will not allow additional public comment on an issue. For agenda items that the public has not had a chance to provide input, the Board Chair may allow limited opportunity for comment. The Board Chair has the discretion to limit the number of speakers and/or the length of each comment.

4. Executive Committee Report (8:15 -8:25 a.m.)

Background

- The Executive Committee will meet on November 11, 2026

Presentations

- D. McKiernan will provide an update of the Executive Committee's work

Board action for consideration at this meeting

- None

This Agenda Item will be Joint with the MAFMC

5. Discuss Sector Separation Amendment Stakeholder Workshop Results (8:25 – 9:55 a.m.) Possible Action

Background

- The Sector Separation Amendment is being developed jointly by the Policy Board and the Mid-Atlantic Fishery Management Council. The Amendment explores options/alternatives for managing the for-hire (charter/headboat) and private recreational fishing modes separately for summer flounder, scup, black sea bass, and bluefish, as well as options for for-hire permitting and reporting.
- In December 2025, recognizing that additional stakeholder input was needed, the Policy Board and Council agreed to delay the development of a Draft Amendment

Document to conduct a stakeholder workshop in 2026 to further refine the amendment options/alternatives.

- The Sector Separation Stakeholder Workshop was held September 23-24, 2026, in Baltimore, Maryland, bringing together diverse perspectives from across the recreational fishing community to explore management approaches that reflect the unique needs and priorities of different recreational fishing modes. (**Briefing Materials**).
- Draft options/alternatives are scheduled for approval at the Commission's Winter Meeting in late January 2027, with final action tentatively scheduled for August 2027 (**Briefing Materials**).

Presentations

- Staff will present summary recommendations from the stakeholder workshop

Board action for consideration at this meeting

- Provide Direction to the PDT/FMAT on Amendment Options

6. Update on the Marine Recreational Information Program Fishing Effort Survey Estimates 9:55 - 10:25 a.m.)

Background

- NOAA updated its Marine Recreational Information Program (MRIP) Fishing Effort Survey (FES) design in 2026 to address overreporting in private boat and shore fishing trips. NOAA modified the order of fishing recall questions (asking about 12-month activity before 2-month periods) and increased survey frequency from bi-monthly to monthly to reduce reporting errors and illogical responses. The revised FES design corrects past overreporting, resulting in systematically lower recreational effort and total catch estimates with smaller margins of error.

Presentations

- NOAA will present the recently published updated recreational fishing effort and catch estimates focusing on ASMFC species

Board action for consideration at this meeting

- None

7. Update on Recreational Angler Partnership Improvement Directive (RAPID) Initiative (10:25 – 10:35 a.m.)

Background

- In April 2026, NOAA Fisheries introduced RAPID as a core component of its updated National Saltwater Recreational Fisheries Policy. RAPID is designed to modernize the way saltwater recreational fishing data is collected and managed by transforming the existing Marine Recreational Information Program (MRIP)

Presentations

- A. DiJohnson will present an update on the progress of the initiative

Board action for consideration at this meeting

- None

8. Committee Reports (10:35 – 10:50 a.m.) Action

Background

- The ACFHP will meet on November 9 and 10,2026
- The Habitat Committee will meet on November 11, 2026
- The Law Enforcement Committee will meet on November 9 and 10, 2026

Presentations

- S. Kaalstad will present the work of the ACFHP and Habitat Committees
- K. Blanchard will present the work of the Law Enforcement Committee

Board action for consideration at this meeting

- None

9. Stock Assessment Updates (10:50 – 10:55 a.m.)

Background

- The Atlantic sturgeon and Cobia stock assessments are on-going.

Presentations

- K. Drew will present an update on species assessment whose management board did not meet during summer meeting (Atlantic sturgeon and AMG Cobia)

Board action for consideration at this meeting

- None

10. Review Non-Compliance Findings, if Necessary Action

11. Other Business

12. Adjourn

DRAFT PROCEEDINGS OF THE

ATLANTIC STATES MARINE FISHERIES COMMISSION

ISFMP POLICY BOARD

The Westin Crystal City
Arlington, Virginia
Hybrid Meeting

August 6, 2026

These minutes are draft and subject to approval by the ISFMP Policy Board.
The Board will review the minutes during its next meeting.

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INDEX OF MOTIONS

1. **Approval of agenda** by consent (Page 1).

2. **Approval of Proceedings of Wednesday May 6, 2026 by** consent (Page 1).

3. **Move on behalf of the American Lobster Management Board, move to send a letter to NOAA Fisheries recommending the modification of the federal regulations for the LCMA 5 season closure to allow black sea bass fishermen that hold a lobster permit to set and haul gear to fish for black sea bass beginning on March 9 instead of March 24 while maintaining the prohibition on lobster and Jonah crab harvest and possession from February 1 through March 31** (Page 1). Motion by Renee Zobel. Motion passes by consent with two abstentions (NOAA, FWS) (Page 2).

4. **Move on behalf of the Atlantic Striped Bass Board, move to recommend the ISFMP Policy Board approve and send the striped bass offshore aquaculture comment letter to NOAA Fisheries as modified today** (Page 2). Motion by Nichola Meserve. Motion passes 15 in favor, 1 opposed, 2 abstentions (Page 2).

5. **Move to approve the Commission Stock Assessment Schedule, as modified today (Option 1, delay weakfish and assess tautog in 2028)** (Page 16). Motion by Jason McNamee; second by Marty Gary. Motion passes (12 in favor, 1 opposed, 5 abstentions) (Page 17).

6. **Move to adjourn** by consent (Page 24).

ATTENDANCE

Board Members

Carl Wilson, ME (AA)
Rep. Allison Hepler, ME (LA)
Renee Zobel, NH (AA)
Doug Grout, NH (GA)
Dan McKiernan, MA (AA)
Raymond Kane, MA (GA)
Rep. Sarah Peake, MA (LA)
Jason McNamee, RI (AA)
Eric Reid, RI, proxy for Sen. Sosnowski (LA)
Shanna Madsen, CT (AA)
Bill Hyatt, CT (GA)
Robert LaFrance, CT proxy for Rep. Gresko (LA)
Marty Gary, NY (AA)
Emerson Hasbrouck, NY (GA)
Monica Martinez, NY (LA)
Joe Cimino, NJ (AA)
Adam Nowalsky, NJ (GA)
Kris Kuhn, PA, proxy for T. Schaeffer (AA)
Loren Lustig, PA (GA)
Jordan Zimmerman, DE (AA)
John Clark, DE, proxy for R. Miller (GA)
Michael Luisi, MD (AA)
Russel Dize MD (GA)
Joe Grist, VA (AA)
Del. Adele McClure, VA (GA)
Chris Batsavage, NC, proxy for M. Loffler (AA)
Ben Dyar, SC, proxy for B. Keppler (AA)
Chris McDonough, SC, proxy for Sen. Cromer (LA)
Doug Haymans, GA (AA)
Spud Woodward, GA (GA)
Erika Burgess, FL, proxy for J. McCawley (AA)
Garry Jennings, FL (GA)
Daniel Ryan, DC
Mike Ruccio, NMFS
Lowell Whitney, US FWS

(AA = Administrative Appointee; GA = Governor Appointee; LA = Legislative Appointee)

Staff

Bob Beal
Toni Kerns
Tina Berger
Madeline Musante
Alexander Law
Caitlin Starks
Emilie Franke
Tracey Bauer
James Boyle
Chelsea Tuohy
Pat Campfield
Katie Drew
Jeff Kipp
Samara Nehemiah
Jainita Patel

The ISFMP Policy Board of the Atlantic States Marine Fisheries Commission convened in the Jefferson Ballroom of the Westin Crystal City Hotel, Arlington, Virginia, via hybrid meeting, in-person and webinar; Thursday, August 6, 2026, and was called to order at 9:50 am by Chair Daniel McKiernan.

CALL TO ORDER

CHAIR DANIEL McKIERNAN: Good morning, everyone. We're a few minutes late so let's get going. I am Dan McKiernan, the Administrative Commissioner from Massachusetts and the Chair. On my left is Doug Haymans, the Vice-Chair from the state of Georgia.

APPROVAL OF AGENDA

CHAIR McKIERNAN: First on the agenda we have the approval of the agenda. Do we have any additions to the agenda? I have one, which is after public comment I am going to invite the Board Chairs of the Lobster Board and the Striped Bass Board to present letters that the Policy Board is being asked to submit to NOAA Fisheries. One on the Area 5 Lobster Fishery and the other Ms. Starks with the Striped Bass Aquaculture Technical Memorandum. Any objection to those changes? Seeing none; thank you. All right; we have approval of the agenda. No ready changes to the agenda, other than mine.

APPROVAL OF PROCEEDINGS

CHAIR McKIERNAN: Any discussion of the proceedings from the last meeting, the minutes of the meeting. Seeing none; can I get a motion to accept the proceedings. Doug Grout, second by Joe Grist. Any objections? Seeing none; thank you.

PUBLIC COMMENT

CHAIR McKIERNAN: Now we're going to take public comment. Is there anyone either in the room or virtual, who would like to speak to any issues not on today's agenda? I don't see anyone in the room, and there are no hands up, so we'll move on.

LETTERS FOR THE POLICY BOARD

CHAIR McKIERNAN: Next, we are going to invite the Board Chairs from the Lobster Board and the Striped Bass Board to discuss the letters that have been approved to go to NOAA Fisheries. I do want to mention that Nichola Meserve, who is my proxy is at the table, but for purposes of this issue only. Renee Zobel, you want to speak to the letter regarding the Area 5 Lobster Fishery.

MS. ZOBEL: Sure, I think we have something being pulled up. **On behalf of the American Lobster Management Board move to send a letter to NOAA Fisheries recommending the modification of the Federal Regulations for the LCMA 5 season closure to allow black sea bass fishermen that hold a lobster permit to set and haul gear, to fish for black sea bass beginning on March 9 instead of March 24 while maintaining the prohibition on lobster and Jonah crab harvest and possession from February 1 through March 31.**

CHAIR McKIERNAN: Can I get a second? Joe Grist. Would you like to speak to it?

MS. ZOBEL: Sure, this was all at the recommendation of both the TCs. This was reviewed by the PRT, the LEC and then the discussion by the Board put this forth. We did modify some language that was originally intended to clarify that Jonah crab harvest would also continue to be prohibited and this would just allow for black sea bass harvest.

CHAIR McKIERNAN: Is there anyone else who would like to speak to this issue, or have any clarifying questions? Seeing none; **can I get a motion to approve? That is the motion. Any objections to the letter? I see none. Any abstentions? I see NOAA Fisheries, Fish and Wildlife Service is abstaining. How about NOAA Fisheries?**

MIKE RUCCIO: I'll abstain.

CHAIR McKIERNAN: Okay, we have abstentions from the two federal agencies. All right, so it

passes with unanimous consent with those two noted abstentions. Next striped bass. Nichola.

MS. NICHOLA MESERVE: We have a motion from the Striped Bass Board. I'm going to introduce the topic first about the Board with all of us here. This doesn't need much introduction, I believe. But the Striped Bass Board has reviewed and forwarded a letter to the Policy Board's duration that is in response to a NOAA Fisheries document charting a course for striped bass science and regulatory innovations for offshore aquaculture.

The letter lays out the Board's concerns with NOAAs draft technical memorandum, and includes that the Board does not recommend moving forward with striped bass offshore aquaculture, based on the information available in the Technical Memorandum at this time. During the Board's discussion there were several modifications made to the draft letter that was compiled from Commission members.

Those are available on the board, did you want me to read those, Toni? Not necessary. In short, they add a new sentence about the cost of VMS devices and an introduction to the user conflict. Site selection paragraph said that it addresses the larger issue of marine spatial planning. The Board also added in the words striped bass to a number of places, so that it was very specific, that the letter was very specific to striped bass.

With those modifications **the motion is that on behalf of the Atlantic Striped Bass Board move to recommend the ISFMP Policy Board approve and send the Striped Bass Offshore Aquaculture comment letter to NOAA Fisheries as modified today.**

CHAIR McKIERNAN: Thank you, Nichola, can I get a second? I see John Clark seconding. Any discussion on the motion? Erika, online, go ahead.

MS. ERIKA BURGESS: I participated in the Board's discussion on this memorandum in February, as well as this morning. My takeaways from the conversation in February were about a lack of information and wanting additional things to be taken into consideration. I believe those things hold true. I asked for clarity this morning on how the Board arrived at outright opposition to the activities in the memorandum instead of waiting for and responding to additional information. I didn't receive any satisfactory or compelling response. My position is still that there are a lot of questions here, there are a lot of unknowns. There are things that haven't been considered but I think need to be.

But this activity has been proposed in the area outside of the management unit of Atlantic striped bass, and there are other parties who have interest here that are not represented on the Striped Bass Board. At this point in time, Florida is not prepared to take a position that no, this should not occur, but would still take the position that additional information is needed and should be considered. For that reason, we will be voting no on this motion.

CHAIR McKIERNAN: Okay, thank you, Erika. Anyone else who would like to comment on this? All right, seeing none. Toni, what is your preference on the vote? Okay, so we are going to vote by hands. **All in favor of endorsing the letter, raise your hand.**

MS. TONI KERNS: New Hampshire, Maine, Delaware, Maryland, Virginia, South Carolina, Georgia, Pennsylvania, New Jersey, New York, Connecticut, Massachusetts, Rhode Island, North Carolina, and Potomac River Fishery Commission.

CHAIR McKIERNAN: Any in opposition? We have Florida.

MS. KERNS: Florida.

CHAIR McKIERNAN: Any abstentions, we have NOAA Fisheries and U.S. Fish and Wildlife Service. Motion passes 15 to 1 to 2. Thank you.

DISCUSS DE MINIMIS POLICY GUIDANCE

CHAIR McKIERNAN: Next on the agenda is the discussion on the De Minimis Policy Guidance. Toni, I believe that is you.

MS. KERNS: A little background on this. The Sciaenids Management Board had a discussion on the de minimis measures for the sciaenids species, which are slightly different for each of the species within their FMPs. At that meeting there was a request to have the Policy Board discuss the De Minimis Guidance that we have for all FMPs.

I'm going to just go through that, and that is why we're here today having this conversation. As a reminder, de minimis provisions in FMPs are meant to reduce the regulatory burden for states whose measures would have a negligible effect on the conservation of an individual species. The de minimis guidelines that we have put together create standards that management boards can build their de minimis provisions for their species FMPs within.

They identify that you can have de minimis by sector, so individually for recreational and commercial, or you can combine together. It presents a threshold and an average number of years that you would use to qualify for de minimis, and that is 3 years of landings and a 1% threshold, and it provides that you can exempt a de minimis state from biological sampling. It does put some qualifiers in there about stock assessments and considerations. But these guidelines, they are guidelines and if individual FMPs have rationales for why these guidelines should be different for that FMP, you as any management board can make changes to these standards to fit the need of that species. As I said, the Sciaenids Board had a discussion about this, and that was because states, particularly on the edge of the species management board have had some very variable landings of sciaenids in recent years.

The states have noted concerns around this, in that either you have unusually high landings and we averaged it. It still contributed to the update falling just above that 1% threshold. There was a lot of uncertainty around MRIP estimates for some of the species, and so it had people falling in and out of de minimis.

Then other states in the management area, which previously contributed to a majority of the coastwide harvest, experienced either a large decline in landings, and so then all of a sudden it impacted those de minimis states. In addition, the states that are just above or at the 1% threshold had been requesting de minimis despite not technically qualifying for it.

This was happening multiple years in a row, and the PRT had noted that there were concerns with whether the current definition was still appropriate, and how meaningful regulations from the states would be on the stock if you took into consideration the state's relatively low contribution to the coastwide landings, and the administrative burden that it puts on states as you pull in and out of de minimis.

The PRT for the sciaenid species looked at what could they do to address these concerns and problems that the sciaenid species is, and just some general things that they had stated is that they cautioned the leeway provided to de minimis states, because it may allow states to remain de minimis despite not qualifying for it if there are concerning trends in the stock or a negative stock status.

They suggested that as changes to the definition of de minimis or the process that it undergoes review by the species TC, to make sure that it is not having a negative impact on the TC. The PRT made several recommendations or considerations to the Sciaenids Board, modifications to the current definition of de minimis and modifications to the de minimis process itself.

They suggested that we could change the number of years of harvest or average, so right now we're 3 years, you could increase it 4, 5, 6, who knows or you could have multiple thresholds, meaning like what percentage do you fall under. I'm going to sort of fly through some of these slides, but if you need me to focus in on them, we can come back to them based on the recommendations.

This is just thinking about how many years you should be using to base that de minimis on. For longer-lived species landings data, whether you

take into account whether or not they are a longer-lived species, you take into account if landings data are highly variable or not. Then where it is suspected that the stock may be undergoing expansion.

Then this is one place where I want to focus. There was a suggestion on thinking about multiple thresholds, and this concept is not really in the de minimis guidelines. I do think that within the De Minimis Guidance you could still do this, (Static) but if you wanted to spell this out you could at least try one. It just looks at a couple different notions of de minimis. You could have full de minimis where you have your number of years that you're considering and what that threshold is, and FMP regulations did not need to be implemented, and no monitoring or compliance would be needed, unless suggested otherwise.

Then you could have a provisional de minimis where you still have landings based on an average number of years and falling into a threshold that is a range, for this example between 1 and 3%. And under these regulations would not be liberalized, but regulations in an FMP would not be needed to be implemented.

Then there would be a full non de minimis where the average landings would be potentially a range of years, and are greater than or equal to a higher threshold than what is under the simple de minimis area, and all non de minimis FMP compliance measures would apply, and if a state hits the threshold, then it cannot request continuation of de minimis or provisional de minimis.

Then there were some suggestions to the modification to the de minimis process. Because the guidelines do not make any suggestions about how often a state could request de minimis when they are no longer in de minimis. It was a suggestion that the guidelines could provide information on that, and states would remain non de minimis or de minimis for a certain number of years. It could go back into the guidelines as well.

Then they also had talked about splitting de minimis by sector, that is already allowed. They also discussed splitting de minimis by stock, which is not spelled out in the guidelines potentially, and the consideration of total removals when determining de minimis, because right now we use landings.

For this Board there was a request to discuss what came out of the Sciaenids Board. I think there was in particular a focus on that tiered de minimis notion, and whether or not that should be added to the guidelines. If the Board does want to make changes to the De Minimis Guidelines, then what areas of focus would you like us to look at, and we can bring that back to the Policy Board at a future meeting.

Again, I do think that all the provisions that are in here can be done, because of the freedom that you have within the De Minimis Guidelines. Just as a board has to provide justification of why you're doing something different. Even in the not using landings and using total catch, that still would be possible in my mind in this, but if you wanted to be more explicit to state that, then you could.

CHAIR McKIERNAN: Any questions for Toni or any discussion? It's pretty open ended, do we need direction? Go ahead, Doug.

MR. DOUG HAYMANS: Since I've been sitting around, I know that Delaware, New Jersey and Georgia have asked for exemptions because they are slightly over. Are there other states, other species outside of sciaenids where this is an issue?

MS. KERNS: I think it is an issue with cobia at times. I am going to look to the back table to ISFMP staff to see if there are other species outside of cobia and the sciaenids that we run a problem with this for. I'm not seeing anyone who had their hand raised. Tracey, what species? Just come to the table. Weakfish sometimes as well, yes.

CHAIR McKIERNAN: Still looking for some guidance. Spud.

MR. SPUD WOODWARD: Just to make sure I'm clear. What the Sciaenids Board is contemplating is within the parameters of the existing De Minimis Guidelines.

MS. KERNS: Correct, and I didn't say this before, but the Sciaenids Board is considering making changes to their de minimis provisions, but we put it on hold until we got the results of the croaker stock assessment to determine whether or not we needed to do an addendum for that, and if so then we would consider the changes to the de minimis when we do that addendum. If the results of the assessment say everything is hunky dory, then they'll initiate an addendum just to make the changes to the de minimis provisions.

MR. WOODWARD: If that is the situation and we don't have any other management boards that have uniquely similar things, then I would say that we leave the De Minimis Guidelines as they are. If they give the Board the flexibility they need to adopt these kinds of modifications, then I think, I'm saying this for selfish reasons, because we chewed this piece of gristle a lot when I was chair. Maybe leaving well enough alone if it's okay where it is, is a good approach.

CHAIR McKIERNAN: I've got Joe Cimino and Shanna Madsen.

MR. JOE CIMINO: I apologize, because I was one who thought that it may need to come to this and there was a lot of work. I really do kind of like the tiered approach, but I doubt that everyone has had a chance to digest that, to see that that should be a new part of this policy. In the end, again I apologize. I agree with Spud. I think this should stay the way it is.

One of the things, as you go in and out of de minimis, changing regulations is a real pain in the butt. I think Toni said something important about an exemption for biological sampling. Weakfish is a good example of that; it would have requirements for biological sampling. I don't think that should ever be a reason for a state to fight going in and out of de minims. I think, you know triggering a requirement to sample a fish you may not see a lot. I can't see the Board actually finding that state out of compliance if they are not meeting their sampling requirements. I would hope that that is something that as a Board we acknowledge that is not really a reason so try and stay in de minimis status, if that is all it is. If it is the regulations, obviously it is a tougher challenge. I think we'll continue to look at that for spot and croaker in particular, and cobia.

MS. KERNS: As a reminder, any species board can make a change to their de minimis provisions through an addendum.

CHAIR McKIERNAN: Shanna.

MS. SHANNA MADSEN: I just wanted to echo the last two comments, where I think as I was reading through this document, and Toni had that actually up on the screen. There was a really common theme and the theme was that people were thinking of the needed species by species flexibility. I think that if our Guidelines already allow us to do that, let's continue to do that, because we want to be able to have these discussions at the species level.

CHAIR McKIERNAN: I've got Ben Dyar.

BEN DYAR: I chair the Sciaenids. During this discussion, not to belabor the point, but just wanted to drive home that I echo those sentiments. If needed, it seems like the threshold approach, if that is desired, could then come back to the Policy Board if it would like to address that. Maybe not put the cart before the horse, and try to put that in there when maybe it never even gets used, once it gets into the discussions within each board.

CHAIR McKIERNAN: Toni, did you have a response?

MS. KERNS: I think it's fine, and I just note that I still think that even if a Board wanted to do the tiered approach for thresholds, I think you can, I don't know, it doesn't say you couldn't. But if it is helpful for other species boards to have that concept

outlined in the Guidelines, then in the future we can do that

CHAIR McKIERNAN: I've got Chris Batsavage and then I'm going to go to Adam. Go ahead, Chris.

MR. CHRIS BATSAVAGE: I agree with all the comments so far, I'm glad to know that the De Minimis Guidelines already offer the possibility for some of the things we're thinking about. In terms of, I guess another species where this could come into play, at least in North Carolina is American eel, where our landings are right around that 1%, sub-1% amount.

But we haven't requested de minimis, or is it kind of going over and under that 1% because part of the requirements for non de minims states is the logbook reporting by commercial eel fishermen. The concern we have is if we were falling in and out of de minimis, then we are requiring and not requiring the logbooks for fishermen, which just adds a lot of confusion to those folks. Just adding some other FMPs where these de minimis issues could be a problem.

CHAIR McKIERNAN: Adam.

MR. ADAM NOWALSKY: I endorse the current approach being discussed with leaving the Commission Guidelines the same and let boards take it up. I think the only additional comment I would make is that if this were to come back before us in the future, I think it would be helpful to have some look at where states have not met de minimis criteria.

But yet boards have granted them de minimis regardless, and then be able to say, which of these or some other mechanism would address those issues, and so that we would know, okay this is what we really need to do to prevent putting boards in the position of having to have to allow de minimis when the Guidelines would say otherwise. I would just offer that that would be helpful should this come back to us in the future.

CHAIR McKIERNAN: Thank you, Adam, that is well put. Toni, it sounds like this just might be a prototype that should it be adopted by the species board in a future addendum, then it could create sort of a path forward if other species had similar challenges.

MS. KERNS: Based off of what the Sciaenids Board did, I think that each species has its own unique struggles in how states go in and out of de minimis. I don't think that there is a one size fits all solution. If anybody requests that the Policy Board bring up de minimis again in the future, I can come to the Board and show where state haven't met it, but stayed in de minimis.

Like I can provide a table of that. But I'm not sure that we would have a solution to say, if you had just stretched out to five years it would have worked for everybody. I think you would have to create some individual solutions for each scenario, if that makes sense.

CHAIR McKIERNAN: All right. Joe, go ahead.

MR. CIMINO: Something that I think was a recommendation was to consider total catch and not just landings. Adam's comments triggered that memory. I think that makes sense, but I think that that would really impact how often states, there is probably going to be a lot more cases of states going in and out of de minimis if we're looking at total catch, especially with D2s. I guess, do we have a solid? Does the Board have a direction that they would like to see that go?

MS. KERNS: I said before, if a species board wants to move to total catch again, they can do so when they develop their new de minimis guidelines trough their FMP. They provide a rationale for why they think total catch is better than landings, and you go that direction and then you test it out, and if it's not doing so great for you then you probably have to go back and make a change.

CHAIR McKIERNAN: I've got Ben, Ben you had your hand up, and then John Clark.

MR. DYAR: Adam's points duly noted and good points. I think the Sciaenids PRT and TC kind of already attacked that to some degree for those species specifically. Those recommendations that were in that sciaenids memo came from that analysis. Then I think as eluding to what Toni mentioned. The decision was to not necessarily put it on hold, but so not to continuously task the TC with looking at these and creating multiple addendums.

The good timing was because of croaker being one species and spot being another, that we would time that with those assessments to have that more in-depth look and be able to knock that all out, potentially in one addendum, and maybe move forward. That is kind of where that might lie if there is a larger move or change to be made, kind of time it with an assessment, and then from there on it can be done through any of the FMPs.

CHAIR McKIERNAN: John Clark, and then I think I'm going to close this discussion and move on in the agenda.

MR. JOHN CLARK: As a state with a lot of de minimis species, and one that has gone in and out of de minimis. One thing that has never been clear to me is once you go out of de minimis and you set the regulations, for example with spot. We put the 50-fish recreational possession limit in. Let's say down the road we go back into de minimis.

It's not clear whether a state, not that we would, but could a state then move that regulation, because now they are de minimis again? Same with like a commercial reduction. It's not clear whether that happens, or once you lost de minimis you've lost it for good, even if you do go back into de minimis situation.

MS. KERNS: I think I followed all that, John. The PRT had those questions of whether or not, how long you should be able to continue to ask or not, then you have a hard stop. I think there are consequences to that, as you have kind of just laid out. The Board should think about that, and again, I think a Board can set those boundaries within the guidelines that we have currently. But it could run into trouble on the way if you get locked out, but that is a species board consideration.

MR. CLARK: Just a follow up, as I said. We probably can't get de minimis, but we have bounced back and forth between de minimis and non de minimis, and we've maintained all the things that we put in place once we were not de minimis. Going back, as I just said, it's not that we were planning to do anything, but just wondering if a state could approach a Board about that.

CHAIR McKIERNAN: Bob Beal.

EXECUTIVE DIRECTOR ROBERT E. BEAL: Yes, just really quickly. I know you're trying to wrap this up, Mr. Chair. But as the plans are written right now, the answer to your question, John, is yes. If a state falls out of de minimis and they have to implement a suite of regulations or sampling, or whatever it might be.

Then a subsequent year they are back within the de minimis status, they can relax those regulations and avail themselves of any advantages that de minis provides. But with that you may be whipsawing in and out. Your regulations may be building around a whole lot. But the way they are written right now, yes you can, you can do that.

EXECUTIVE COMMITTEE REPORT

CHAIR McKIERNAN: Okay, I am going to move on to the next issue, and actually I am going to back up to Number 4, I overlooked the Executive Committee Report. I'm going to give a report that is proportional to the length of the meeting that we had, so I'll be very brief. We got a Legislative Report from Alexander, focusing on the Federal Budget.

We also learned that there is a bill that is floating through the House to potentially pause additional lobster management regulations, an additional 7 years beyond this current 6-year hiatus that we're involved in. We also got a CARES update from Executive Director Beal concerning the status of funds that are in, I think the two states of Florida

and New Jersey. Some of those cases are involved with the judicatory hearings, where the resolution of those cases is yet to be resolved. There is a December deadline that extended to December before the Commission has to begin paying back some of those funds, like we were going to have to ask for that to be extended again, especially pending the outcome of some of those adjudicatory hearings.

Then finally, the annual meeting schedule was discussed with Rhode Island this November, South Carolina a year out for October, and Massachusetts the following year. Are there any questions on my report? All right, seeing none.

DISCUSS SECTOR SEPARATION AMENDMENT TIMELINE AND STAKEHOLDER WORKSHOP PROCESS

CHAIR McKIERNAN: I believe next on the agenda is the discussion of the Sector Separation Amendment Timeline and Stakeholder Workshop Process. Chelsea.

MS. CHELSEA TUOHY: I'm going to give a brief update on the Sector Separation Amendment, the Timeline and the Stakeholder Workshop stats and some Policy Board considerations. The Sector Separation Amendment Stakeholder Workshop has been scheduled for September 23 through 24 at the Sheraton Baltimore Washington Airport Hotel.

Twenty-two participants have been selected from up and down the coast from a variety of recreational sectors. That list was e-mailed to the Policy Board on July 21 for comment, and then those participants were notified on July 28. Just as a reminder for everyone, back in February when the Policy Board met jointly with the Council, the Workshop objectives that were discussed were for the participants to review the list of draft alternatives.

Discuss and provide feedback on questions that were highlighted by the FMAT and PDT, and recommend to the Policy Board and Council any additional options that should be considered in the action, provided that they are within the scope. Another reminder is that the workshop was not identified for one specific recreational sector, but the recreational fishery as a whole.

Moving on to the timeline. What is on the screen right now is the current plan sequence of events with that stakeholder workshop happening in September. Then in December of 2026, the Council and Policy Board would meet jointly to both review the results of the workshop, as well as approve a final range of alternatives. Then in the winter of 2027, the FMAT and PDT would work on developing a draft amendment document.

In the spring of 2027 that document would come to the Council and Policy Board and you all could approve or disapprove it for public comment. We would do the public hearings and public comment period if approved in the spring and summer of 2027, with final action happening in August of 2027 for implementation, or the 2028-2029 measure setting cycle pending how long rulemaking takes. As it stands right now, the current timeline does not provide a meeting between the Stakeholder Workshop and approving a final range of alternatives.

The Commission's typical process would add a joint meeting to review those workshop outcomes, so that the Council and Policy Board or just the Policy Board could provide feedback to the FMAT and PDT before approving a final range of alternatives. The setback here is that if we add a meeting at the Commission annual meeting there is not enough time for the FMAT and PDT to develop options for the joint meeting in December.

The two paths that you all could take if you wanted an additional meeting would be to have a special virtual meeting in mid to late October, and that would allow the Policy Board to provide feedback to the FMAT and PDT to further develop those options, and we could stay on the timeline to approve a final range of alternatives in December, or we could request that the Council in December, or we could request that the Council in December is when we would come to you all, Policy Board and

the Council with the results of the Stakeholder Workshop, and we would push approving a final range of alternatives until the Commission or Council's February meeting.

For Policy Board discussion today, we just ask. Does the Board want to follow the typical Commission process to meet in between when the workshop happens and approving a final range of alternatives to provide feedback into that FMAT and PDT about how those alternatives should be developed following the Workshop.

Does the Board want to discuss with the Council shifting the timeline, and so that in December we could review the results of the Workshop and then later approve a final range of alternatives, or hold a special meeting in October and stay on the current timeline? With that I will take any questions.

CHAIR McKIERNAN: Jason.

DR. JASON McNAMEE: Thanks for that, Chelsea, that was helpful. Just thinking through the timeline, a little bit. Not thinking about the need to sort of sneak a meeting in here at some point. Say everything went kind of on its current plan. It's likely that we couldn't implement anything, even in 2028 at this point. You know I think you kind of spill into the winter period, and so now it is kind of too late to implement like big major changes in the state regs, so we'll probably be looking at 2029. Is that correct?

MS. TUOHY: Right now, final action is tentatively scheduled for the summer of 2027. I think we would have to have discussions with GARFO about the rulemaking timeline and what they believe is possible if we wanted to implement for the 2028-2029 spec setting cycle, and Toni may have something to add here.

MS. KERNS: I think it really depends on what changes are made, because as you know we do have mode management within the purview of our spec setting measures. Depending how far it veers from those management, you may be able to do what is in there, because the state-specific measures fall within the Commission process. Now we have to make sure we're blending okay with NOAA, but we might be able to, as long as they can finish the action before the start of the season.

CHAIR McKIERNAN: Follow up.

DR. McNAMEE: I appreciate what you said, so it sort of depends. But if it were something more complicated then what we're already allowed to do, we would be really hard pressed to kind of get things done there. Thanks for that clarification, and so I wonder how that factors in to this. If we didn't do this, would that push us even further? Do we have potentially some slack in 2028? I guess what I'm thinking about is, I think it is super important to have a meeting. One way or the other it would be best if that meeting could be in person. I'm just wondering, is there a reason to kind of really jam ourselves up here or just sort of looking forward is there some slack, just accepting that this might not happen until 2029 under certain circumstances.

CHAIR McKIERNAN: Joe Cimino.

MR. CIMINO: Yes, I would like to follow up on that. The two paths would be, it is pretty simple options, not too far from what we can do right now, or maybe even the same, or it's complex and then we're probably talking about 2029. I'm curious, is the annual meeting far enough away that maybe we could either say, it's simple and we know, because the Workshop is in September.

It is simple and we have a summary by the annual meeting or by the annual meeting we could decide we are really talking about 2029, and then have a later discussion. But at least know at the annual meeting which way it's going.

MS. KERNS: I'm not sure. I guess it depends on what the stakeholders are recommending. At this point, I think the way the options are developed in the document it's not highly complex right now. It depends on what comes out of the Stakeholder Workshop, so it's very difficult to predict that, if they are going to suggest something that the FMAT

and PDT are going to have to wrangle into some more complex options.

But again, it depends on the direction or options, but we wouldn't be able to predict which option the Board and Council are going to lean towards, because there will still be some simple options in the document, and there might be more complex options in the document.

CHAIR McKIERNAN: Toni, I have a concern that it is one thing to get stakeholder recommendations. It's another thing for a bunch of state administrators to actually execute something that might come out of this workshop. For instance, if limited entry becomes a core component of this.

I don't think states are going to be able to pull that off as fast as maybe the recommendations that come out of the Work Group, which is a group of stakeholders. I would suggest that time would be really valuable, because I think we all need to process what the sequence is going to be to adopt these measures or not. Go ahead, Doug.

MR. HAYMANS: It sounds like we ought to just plan to review the stakeholder input at the annual meeting rather than having this additional meeting in between, which is basically pushing the whole thing back.

MS. KERNS: We can do that, and that can potentially put us in a separate path with the Mid-Atlantic Council if the Mid-Atlantic Council does not agree to delay. That is a possibility, and as long as this Board is okay with moving at a different timeframe as the Mid-Atlantic Council if they do not concur with us in the delay, then that is possible. I just want to make a note that we could be veering.

CHAIR McKIERNAN: Chris Batsavage remote, go ahead.

MR. BATSAVAGE: Yes, trying to think through the options here considering all the unknowns. I guess to the most recent point. I would want to hear more about the disadvantages of kind of moving out of step from the Mid-Atlantic Council and the process on this joint amendment. That seems kind of awkward, maybe extra work for staff.

But to look at the options up on the screen now. I was originally leaning towards following the Commission process with a virtual meeting in mid to late October, to give direction to the PDT and FMAT. The reason for that is shifting the timeline to where I think Chelsea mentioned that we could meet jointly with the Mid at their February meeting.

The February meeting for the Mid-Atlantic Council is completely virtual. We can do that; we've done that plenty. But I heard some concern about what we're facing with this amendment of, would it be better if we were meeting jointly in person to approve this to go out for public comment, as opposed to meeting virtually for the Mid's meeting in February.

MS. KERNS: Chris, we had two options up there, just to make sure we know that we could invite the Council to come to the Commission meeting. We've had several meetings where this Board has gone to the Council meeting, so we could request that they come to our February meeting.

MR. BATSAVAGE: Yes, thanks, Toni. It's more towards the Mid's calendar. That would probably be the better option, I would say.

CHAIR McKIERNAN: Adam.

MR. NOWALSKY: I would be adamantly opposed to doing this not in lock step with the Council. There is so much of this that is dependent on federal rulemaking, particularly from New York and South, where pretty much everyone who participates in multiple of these fisheries occur in federal waters.

From Delaware South, all black sea bass is almost exclusively federal waters. There was a commitment early on in this process to work in concert with both bodies. I have long looked at the action plan that had a stakeholder workshop in September, a range of alternative discussion in December, with this Workshop Report presented to Council and Board in fall of 2026, with a where,

when, how, and now we're having that discussion. Good, need to have it.

I think we should have some ideas here today. I would hope that staff could take some of the things that we talked about today, talk to Council leadership and staff about them, and hopefully there is a place for this conversation to potentially be continued next week, when we're already, most of us will be meeting together with them in some capacity. But I can't endorse a way forward, given how much of these fisheries take place in federal waters. I can't endorse a way forward where we're going to go down a path of getting out of lock step with the Council on this.

CHAIR McKIERNAN: Given those sentiments, would you endorse inviting the Mid-Atlantic Council to our February meeting, to have that joint meeting at that time?

MR. NOWALSKY: I would definitely. I think the place for slippage here is potentially where this December timeline that said Council and Board approve a range of alternatives. I think that could be slipped to February, either here or virtually, and still keep the timeline in place for anything that could be implemented for 2028. That I would endorse.

CHAIR McKIERNAN: Can we continue on that vein and get support for that or any competing ideas? I like that. Toni.

MS. KERNS: I think we would just need to spell out what the full list that we would be bringing to the Council. I think what I'm hearing is that we would like to meet in person, that we would like to meet at the Commission's annual meeting, we can invite the Council. Annual meeting to hear the results of the Workshop, and we can invite the Council to that meeting either in person or virtually. But this Board wants to provide their feedback to the FMAT and PDT at that time.

Then we would discuss with the Council this shifting, reviewing the final range of alternatives at the Commission's February meeting. It may be that the Council may or may not want to come to our annual meeting, but regardless, this group would get that feedback to the FMAT and PDT at that time. I think that that provides the FMAT and PDT a good chunk of time to develop those final range of alternatives in time for our February meeting, which is slightly earlier than the Councils.

CHAIR McKIERNAN: Thank you, Toni, Mike Luisi.

MR. MICHAEL LUISI: Thank you, Mr. Chair, I was just giving you the thumbs up that what Toni was saying sounded good on my part.

CHAIR McKIERNAN: Joe.

MR. CIMINO: Just one other thought too. Adam mentioned next week. I think if there is some further discussion that needs to happen next week, that the Bluefish Board is meeting jointly for an hour to do specs. I don't believe it is going to take that long. Then the Board will meet separately for a moment.

That might be a chance. I think the vast majority of folks, certainly that would be affected by policy, would be covered in that Board. Whereas, Flounder, Scup and Sea Bass has less of the Policy Board involved. I will keep that in mind, if we need a further discussion and a joint discussion that we could use the Bluefish Meeting.

CHAIR McKIERNAN: Okay, so at this point do we have kind of clear consensus? Yes, all right, thank you everyone that was good. Thank you, Chelsea.

COMMITTEE REPORTS

CHAIR McKIERNAN: All right, next Committee Reports, Committee on Economics and Social Sciences.

COMMITTEE ON ECONOMICS AND SOCIAL SCIENCES

MS. JAINITA PATEL: I'm just going to provide quick updates on both the Committee on Economics and Social Sciences as well as the Assessment Science

Committee. This week the CESS or the Committee on Economics and Social Sciences met to discuss several ongoing topics, including how to management requests, how to address the socioeconomic section of the Risk and Uncertainty Tool, as well as the Striped Bass Bioeconomic or Recreational Demand Model and other socioeconomic topics. Of those topics, I did want to provide just a quick update for the Board on the Recreational Demand model, as well as the task that the CESS will be working on in the next few months. For the Rec Demand Model, we had contractors Scott Steinback and Lou Carr-Harris present the work that they've done this year.

In short, the modeling framework links angler behavior and stock dynamics and regulations, with the goal of improving evaluation of future striped bass and bluefish management strategies. They used focus-group surveys, choice experiment design, econometric evaluation, and bioeconomic simulation to create this model.

Currently they are drafting a technical report of their work to wrap up what is possible with their year Commission funding. They started this project last August, so they will be coming to the end of their contract toward the end of this month. Currently as the model stands it is sound for bluefish management. It will need a little more work to make it useful for striped bass.

There was a lot of work that went into this, and I've obviously distilled this down quite a bit into just a few bullets. But if you would like more information on this, please feel free to reach out to me. Outside of the Risk the CESS has several ongoing tasks, some of which some of you may have heard during this week.

In addition to that they are working to adjust the socioeconomic metrics in the Risk and Uncertainty Tool, alongside the Assessment Science Committee's Risk and Uncertainty Work Group. A lot of those adjustments will be based on some of the discussion that they've had during this week's meeting.

Additionally, staff members are also open to future questions about some of the work they presented this week on menhaden and spiny dogfish, as well as the socioeconomic section of the draft addendum. For lobster in the future, if the Board initiates a management objective process, the CESS can provide input depending on the outcome of that process.

For striped bass, I know we have a future management work group, so if there are any specific tasks from them, the CESS can assess feasibility and potentially help with that as well. We also had a request to create an infographic with a current snap shot of striped bass economic data for this year. We will be working on that in the near future as well.

One thing that I believe isn't mentioned on this slide is that the CESS could also potentially help with any social of economic questions that arise from the Sector Separation Workshop in September. Outside of that, if there is something that we didn't cover that you would like to see addressed, I would love to hear about it, so I could bring it to the committee for consideration. I will just take a pause there, just in case the Board has any questions or any requests for the Committee.

CHAIR McKIERNAN: Any suggestions for the Committee. Adam.

MR. NOWALSKY: Not a suggestion, but can I ask a Recreation Demand Model question, or do you prefer I take that completely offline?

MS. PATEL: Go for it, I will do my best.

MR. NOWALSKY: The Recreation Demand Model has been used for summer flounder, scup and black sea bass. It has been run by the Science Center. It has been the property of the Science Center. They have determined when, how people would have access to it. It has been dependent on their funding for when to make it available.

In making it available for bluefish and more importantly striped bass, is there a plan in place

that would provide some ownership by the Commission for access to running it, or is the intention for this still to remain entirely the property of the Science Center, and access to it, running it is purely at discretion of their funding, their resources, their timeline?

MS. KERNS: Thanks for that question, Adam. I don't have an answer for you yet; it is things that we have been talking about and trying to figure out what is the most cost-effective way to have all of these models. Then because striped bass is Commission species, like whether or not they can carry those costs that are associated with the cloud and the running of that RDM or not, and if not, then like what is the cost?

Because there is a cost to like building it outside of that cloud version, I believe. We're still trying to find funds in order to finish up the additional work that needs to be done for the two species, in order to be able to make them work. Thinking about it and trying to figure out how to do it, and where the money would come from.

CHAIR McKIERNAN: Adam.

MR. NOWALSKY: My comment would just be that that is a very high risk, I think, to those species' boards here right now and the endorsing of utilizing it, while it certainly brought an awful lot to management. That is a large risk to those management boards if it remains completely their property, in my opinion. Thank you.

MS. KERNS: We are having discussions about how we as a Commission can, and Council, take, I'm not going to say take over all of the species, but ways so that we can make decisions about when we want to go in and work on the model and making sure that the states have enough individuals that are fully up to speed on how to run and work the model for all of the species, so that we can utilize it when we need it and not have to rely on the Center to do so, and this is an ongoing discussion that we are having.

CHAIR McKIERNAN: Jason, did you have your hand up?

DR. McNAMEE: Jainita, great meeting. I had the opportunity to kind of sit in for a portion of the meeting and it was excellent. The folks on the Committee are great. One thing that came up, and I'll apologize, because you guys were meeting, I think in a jet engine. I was having a little bit of trouble hearing the discussion in parts. I thought I heard one of the Committee members talk about potentially developing like little mini reports, or something like that based on data and access to data that the Science Center has. Could you clarify, were they talking about just like specifically about one of the species you were talking about, or were they speaking more broadly about hey, we could kind of do something like this.

If it's the latter, I wonder if it's like akin to some of the stuff that the Science Center puts into the State of the Ecosystem Report, but would just be kind of you know customized to their Commission species, or something like that. Just a little bit of info on that part of the conversation, just because I couldn't hear it well.

MS. PATEL: Yes, good question, Jay. I believe it is for the latter, not just for species of interest. But eventually the vision is to do it for every fishery managed species, to have an economic snapshot that is available for you all to readily access, that would be updated once a year, and would tentatively be automated, it would update annually.

I am in conversation with our Federal CESS members who have access to those resources at the Center, to be able to sort of move that process along. But we're still in very preliminary conversations about what that Dashboard something would look like, but it would be for Commission species specifically.

CHAIR McKIERNAN: Any other questions or comments? No, all right, thank you, next report.

ASSESSMENT SCIENCE COMMITTEE

MS. PATEL: Thank you all, so I'll just move quickly into the Assessment Science Committee updates. First there is a little bit of background. More than

15 years ago, Pat Kildruff, John Carmichael, Rob LaTour and Tina put together a very useful Guide to Fisheries Science. This document is really meant for folks to understand the science behind what we do here.

However, given that there has been 15 years since the last update of this document, we thought that it was time for an upgrade, and to make it a little more accessible and a little bit more relevant to the way that the science has evolved since then. Over the past few months staff has put a lot of time and effort into pulling together an interactive version of this guide, which I think we can put on the screen. Yes, there it is.

The Assessment Science Committee did have a chance to also review this and provide their input. This should be accessible through the Commission's website. You also understand that this is a digital version of this slide, and some of you might want something offline to use or to print, so we aim to have a PDF version of this new and updated guide in the next few months as well. Moving right along. During spring meeting, the Tautog Management Board asked about the feasibility of advancing the tautog benchmark, currently scheduled for 2029.

The request waws mainly prompted by increasing retrospective patterns during assessment updates, changes in stock status determinations and the availability of new fishery independent indices. This matter was brought to the Assessment Science Committee, and I believe a memo was drafted for your consideration, and it has been included in the meeting materials, along with a copy of the current stock assessment schedule.

Details of the Assessment Science Committee's discussion are in that memo, but I will very briefly summarize the carry offs that they came up with here for your discussion. If the Board is still interested in moving up tautog, the first option would be to stop tautog with weakfish. This would move up the benchmark, but it would also increase the time before the next weakfish assessment, the last of which was in 2016.

The second option would be aiming for a tautog benchmark by 2028 and pushing back the work on spot, which is currently scheduled for next year, but likely work on spot will realistically extend through 2028, based on the current schedule. Then the third option would be to maintain the current schedule. For discussion today we would just like to see where the Board settles on these options and what path forward, we would like to take with a timeline for this assessment.

CHAIR McKIERNAN: Any input on these three options? Yes, Rich.

MR. RICHARD A. WONG: I would just like the Board to understand a little more context with tautog. We have regional assessments for tautog, and probably the regional assessment with the most uncertainty is the Southern assessment for DMV. We've been using this assessment to manage, and it's kind of hard for me not to keep a straight face and use this assessment.

But in any case, moving the tautog assessment up I know has benefits for the Northern Regions, but if we can get one or two more years in our indices for the Southern assessment, it would be really, really valuable. Because we have two indices that will be added to that assessment, which really could have huge and profound impact on the quality of that assessment.

It's just something. I know there are some benefits that people are aware of to moving it up, but there are also some benefits to keeping it on schedule. Also, we're in the middle of an addendum for tautog, and we'll be implementing new regulations right when those regulations will go into place, and then we'll have an assessment moved up really quickly.

Then we'll be potentially whip-sawing back or undoing the restrictions, which may be good or may be bad. For me it sends a little bit of a weird message to our anglers that hey, we have to restrict the fishery because of a very recent stock assessment, but we're going to do another assessment really, really quickly and try to undo

them. I feel like that kind of sends a weird message to our anglers. But anyway, those are some thoughts for the Board to consider.

CHAIR McKIERNAN: Jason.

DR. McNAMEE: I appreciate the thought that went into this. I have two questions, maybe the first one is more of a comment. I think the incentive to push tautog or pull tautog off to do a quicker, was premised around the notion at the time that there was going to be a delay in doing anything with the Addendum.

It is a question, so I wonder if the pressure to move tautog up is kind of released, because we sort of solved that problem whatever day that was. It feels like a week ago, but maybe it was two days ago. Just a question/comment there for folks to ponder, and that would be, I guess if people feel the same way, then that would allow us to keep it on its current schedule. Then my follow up is, on weakfish how does that impact some of the multispecies work?

Maybe the alternative here is we don't benchmark it but we just do an update, and we can kind of keep on schedule with the multispecies modeling. But weakfish is one of those species that is in that mix, so I want to make sure there is not some indirect impact to this that we haven't thought about.

MS. KERNS: We'll let Katie speak to the one, but I will say for tautog that is a question to you all, not for staff to answer. Maybe it did really make you all feel better, and so you don't feel like you need to shift tautog anymore. Because this was a recommendation from the May meeting, not this meeting if you recall. Katie, you can speak to what happens to weakfish.

DR. KATIE DREW: Jay, you may not know this, because you were not part of the weakfish group, but the last assessment was, the SAS did not recommend using it for management use, given basically the way some new information we had on M and the way the model is parameterized to task natural mortality at a level that is lower than what you could measure recently by some tagging studies.

The SAS and the Technical Committee felt that given that issue with the model, it's not really ready for management and we would not recommend an update, instead we would recommend a full benchmark to really reevaluate this. In terms of the timing for multispecies work; it is a great question.

Obviously, weakfish will also be influenced a little bit by the MRIP changes, as will striped bass and bluefish. I think there may be some other considerations around multispecies modeling that are bigger than whether weakfish is reviewed in 2028 versus 2029. I think there is probably a benefit to keeping it in 2028 from that perspective, but there are also going to be other considerations around, again striped bass and bluefish in that model.

CHAIR McKIERNAN: Okay, I've heard from Rich and Jason and from Katie that they would be leaving the order as is may have some benefits. Joe.

MR. CIMINO: The other side of this from me is, taug isn't just a heavily recreational species like bluefish or striped bass, it is also one that has almost no other input other than MRIP catch, including in some of our assessments. To me the push to update has always been, I don't want to be managing on the wrong information, so getting the new MRIP estimates and putting that in for taug.

I think is, in my opinion, more important than an update for weakfish, because I can't imagine us doing anything with that information. We already are managing without an assessment, and another year of that I don't see an interest in folks taking action to changing weakfish. I don't know what a status update would do there. Now that was not considering multispecies concerns.

CHAIR McKIERNAN: All right, Marty Gary.

MR. MARTIN GARY: Just in concurrence with Joe on this, and I think New York's preference if the Board

would support it would be to go with Option 1, for the record.

CHAIR McKIERNAN: Toni.

MS. KERNS: Again, you know it's should the tautog assessment be shifted forward. If so, which option, and if you want to move it I would suggest making a motion for someone, or however you want to move it, if it needs to be moved.

CHAIR McKIERNAN: Jason.

DR. McNAMEE: Yes, sorry, I know that you probably want me to go to the motion, but I have one more question.

CHAIR McKIERNAN: Would you make a motion after your question?

DR. McNAMEE: Maybe. We've been talking about weakfish and tautog, swapping those. What about spot? I don't know enough about that tradeoff to understand the impacts, whether the weakfish impact is greater than or less than the impact of spot.

DR. DREW: I'm not sure if Ben would like to comment on that specifically, or I can say something about it. I think the issue with spot is, spot has never had a model. Like there is no model for it right now. I think spot is probably in a situate. Unlike weakfish, which even though the TC recommended not using that model, we said it's likely that there are no significant changes to stock status.

It remains kind of at that low depleted level, based on the fishery independent information that we have. I think for spot we are definitely more in a situation where there is the potential that we need some kind of management for this, and we don't have a good quantitative tool for it.

In addition, like sort of the work that has been done on croaker, I think has sort of set that group up to do a good job with spot. However, I think again, it comes back to what are the priorities of the Board in terms of spot. Can spot hang out another year in this traffic light situation? I think that is up to the Board to decide.

CHAIR McKIERNAN: Ben and then I am going to get to Shanna. Go ahead, Ben.

MR. DYAR: I would very much echo concerns for delaying spot for any length of time. Previously the benchmark, the last benchmark that was done was in 2017, it was not considered for management use. Right now, the abundance and fishing are unknown for that species. We are managing under a traffic light assessment.

The plan was typically spot and croaker were lumped together under a traffic light, and the plan was to split those apart and sequentially do those in order for those assessments, which is much needed. We do have some concerns regarding some of our spot landings in South Carolina. That assessment is definitely needed and wanted. That would be not in favor of Option 2.

CHAIR McKIERNAN: Shanna.

MS. SHANNA MADSEN: I think Ben just covered what I was also going to say, just knowing a lot about that species and congratulations on just, I heard, passing croaker potentially. Now we actually have something set up for spot, and so that having been on a traffic light for so long, Option 2 for me was a nonstarter.

CHAIR McKIERNAN: Jason, are you going to give us a motion?

DR. McNAMEE: I would make a motion if you would like, Mr. Chair. I think that was a really good discussion. Thinking more about what Katie said about weakfish, with respect to the multispecies work, I think there is a way forward. Just given the status of that and the really low level of the species. I will **make a motion that we adopt Option 1 as a way to modify the assessment schedule to move tautog up and trade it off with weakfish**.

CHAIR McKIERNAN: Is there a second, Marty Gary. Do you want to speak to the motion or do you feel you've already done that.

DR. McNAMEE: There was enough discussion there, so I heard enough compelling reasons to move, tautog is my fav, so I am always happy to move it up. Moving tautog up, and I don't think the impact with weakfish will be terrible.

CHAIR McKIERNAN: Marty, would you like to speak to it?

MR GARY: No adds, nothing bad, thank you.

CHAIR McKIERNAN: Any discussion on the motion? Yes, Adam.

MR. NOWALSKY: To Rich's point about additional indices potentially being available. If we didn't integrate those in the benchmark, what would be a next available time to integrate them? Could they be integrated through an update, or would they have to wait for another benchmark

DR. DREW: I think all of the ones that we have examined would have enough years of data to be included in this benchmark. It would be sort of right on the edge of what we would consider acceptable, in terms of time series length. As Delaware was saying, a few years ago is a boon. But I think everything we've seen so far have discussed with the states, in terms of new indices, would be available to be considered and used in this benchmark, and we would not have to wait on that front for just an extra year.

CHAIR McKIERNAN: Mike Luisi, go ahead.

MR. LUISI: I support the motion. I think listening to the discussion, I think tautog is just more relevant right now. We had a big discussion about that already this week, and look forward. I just think it makes sense to delay weakfish, so I'll support the motion.

CHAIR McKIERNAN: Chris Batsavage online.

MR. BATSAVAGE: Not sure if I'll support this or not. I've heard plenty of reasons why this could make sense. What would help me is a question for Katie. Is there some benefit to the Stock Assessment Subcommittee for moving weakfish back, considering the challenges they had with the last assessment that wasn't used for management? Buy them a little more time do them some good?

DR. DREW: I think it would give us maybe a little more, like essentially whatever species we choose to be completed in 2028, needs to like start now. We are having a little bit of extra time, so it means tautog is going to have to like turn this around really quick, and also versus weakfish might have a little extra time, so that we could maybe dig into some of these issues a little more deeply. But I think there is nothing in particular that is in the works that an extra year would be specifically.

CHAIR McKIERNAN: I would like to **call the question, any objection to that? All those in favor, hold on, do you need a minute to caucus, Eric? Give you one minute, Eric. Okay we're back to a vote on the question. Are there any objections to the motion? All right, so we will take a vote. All in favor.**

MS. KERNS: Rhode Island, Massachusetts, Connecticut, New York, New Jersey, Florida, Georgia, South Carolina, Virginia, Maryland, PRFC and North Carolina.

CHAIR McKIERNAN: Any opposed?

MS. KERNS: Delaware.

CHAIR McKIERNAN: Any abstentions?

MS. KERNS: Maine, New Hampshire, NOAA Fisheries, Fish and Wildlife Service and Pennsylvania.

CHAIR McKIERNAN: Any null votes? No. Motion passes 12 to 1 to 5 that is 5 abstentions. Very good, thank you.

FISHERIES COMPENSATION FUND FOR ATLANTIC COAST OFFSHORE WIND PROGRAM OVERVIEW AND RECENT WORK

CHAIR McKIERNAN: Next on the agenda, Number 8, the Fisheries Compensation Fund for the Atlantic Coast Offshore Wind Program Overview and Recent Work. I believe Deirdre Boelke, is she online? Okay, Deidre.

MS. DEIRDRE BOELKE: Thank you for this opportunity, I'll try to keep it brief, keep you on an agenda, hopefully. Just want to share a brief overview of the Regional Fisheries Compensation Program that has been under development for offshore wind impacts. I have worked with many of you before during my time on the New England Council staff, and regret that I can't be with you today.

Thanks to Toni and Dan for finding time on the Policy Board agenda for this overview. My name is Deirdre Boelke, I am an independent consultant and Principal of Fisheries Insight Network. I am definitely only the messenger here. The bulk of this work has been developed by a much larger team, with input from many advisors and stakeholders, which I will explain in a future slide.

The main objective of this presentation is really just to introduce the Regional Fund Administrator or RFA Initiative, to those that might not be familiar with it, and give you an update of where the process is as it's beginning to kind of close into its last few months. Specifically want to inform you that a draft compensation program design is scheduled to be released later this month, and let you know how you could provide comments, how to review the document if you are interested.

Just one background slide in case folks are not familiar. The RFA is an 11-state initiative, all the states from Maine through North Carolina. The intent is to develop a more consistent fair and transparent process for distributing future compensation funds for projects that may be developed off the east coast in the future.

Brown Greer is the administrator who was selected to serve as the primary firm responsible for designing this program together with Carbon Trust. Laura Singer, which some of you may know and myself are subcontractors hired really to support engagement efforts for the project. What is an RFA? Essentially it is a third-party entity, again responsible for designing and distributing these funds, which are separately negotiated through agreements between offshore wind developers per project and relevant state agencies.

I briefly want to clarify the scope of this process, because we do get two questions in particular pretty often. I want to clarify that this process is focused on future compensation programs, so the details of it will not in any way effect programs that are already in place for the several projects that are under development or already developed in the region.

It does address the money and how it is distributed out to fishermen, and it does not directly affect how much money goes into the fund. I just want to clarify that; we get that question a lot. This is not focused on evaluating or assessing how much money should go into this regional fund. Instead, it is the process of how to distribute it.

Also want to point out then, it is probably obvious, but really different in that the idea is that there would be one potential strategy overall throughout the region. Again, a difference of this process is that there is an exterior body that has really been informing this work from the start, compared to previous params, which have been much more kind of project specific.

This is the structure of the Advisory groups. It is somewhat similar to the Commission process in terms of there being numerous advisory bodies that all give input directly to the overall design. This has been in place and was in concept several years ago, but the Design Oversight Committee, the box in the center with the DOC is kind of the main advisory body informing this work.

It is made up of six commercial fishing interests, three offshore wind developers and three state representatives. There are additional kind of secondary members and other designees from all three of those groups that participate in meetings as well, and then on the left-hand side you see FHC stands for For-Hire Committee.

There is a separate group that is advising any for-hire related issues, and then on the right-hand side, not directly involved, but were through the DOC but there are ex-officio federal government employees from primarily NOAA and the Marine Minerals Administration, formally BOEM that are also advising into this, and providing being available for questions. These are the individual involved in the process. The names I have here, I am not going to go through them, but they are probably familiar names to you within the region. The intent initially was to have representative voices from various fisheries gear types throughout the region.

The membership has changed a little bit over time, because this process has been two years in the making, basically. But many or most of these names have been involved from the start and it's a huge commitment of their time and energy, much more than they bargained for, and there have literally been dozens and dozens of calls and meetings over the last year and a half plus.

This is just to give you a very high-level sense of the types of issues and conversations that the DOC and others have been having over the last two years. These are just examples, there are many more, in terms of you know which vessel should be eligible, what actually is a loss that you could submit a claim for.

Will shoreside businesses and crew consider it separately or within the same claim? Will there be an appeals process, any of these. It's just to give you a sense of the types of conversations that these groups are having. This will give you a sense of engagement approach, and there has been extensive engagement throughout this process.

I know it's hard to hit every port of course from Maine through North Carolina. There have been various strategies used that have evolved over the course of the project, depending on the phase that the project is in, definitely in the beginning. First year was focused on listening and learning and hearing from individuals that had direct experience with compensation programs, and trying to gather all those lessons learned over time.

More recently it's been a bit more of an inward focus, kind of really working closely with those EOC and FHC members to get specific feedback on what this design should look like. To give you a sense, we do try to attend events and regional webinars and meetings like this one today. Some examples are shared there on the right-hand side of the screen. You know we do try to get to different regions and have separate phone calls when possible.

The actual draft agreement itself as I mentioned, that is hopefully going to hit the streets soon will probably be in a 50-page state. It's a lot. It's dense, it's complicated, there is a lot of detail in it. This is literally a one-slide teaser to maybe give you a sense of the overall architecture as it is currently envisioned in the draft.

I'm definitely not going to have time to go through the details of all of these various components, but wanted you to at least have a little sense of where it's headed. Right now, there is definitely in the draft a vision for a separate program which export cable route, you know the space of the ocean connecting the project to land, versus the actual offshore project area.

The thought there is the Offshore Export Cable Corridor, as it's called, would be this one-time advanced payment that would be equal, in exchange for temporary access restrictions while the cable is being laid. Different from the actual project area itself, the thinking here is there would be two different phases, the construction part of the project, as well as the operations, and then also within those two paths, so that there could be an expedited review process, which would be more streamlined, more formulaic up front. Kind of know

what you're going to potentially get as a payment with lower burden of proof, versus an individual review, which would be much more based on demonstrated impacts if an individual vessel felt that their claim and impact was higher than the values considered under the expedited review.

There are these two different paths to have this flexibility. A vessel can go down one path and then switch lanes, as it were, to go in a different direction. Really quickly the eligibility to hopefully simplify things. There has been lots of discussion about which vessels would be eligible. A lot of different ideas here.

But right now, the draft is leaning toward, at least for now, considering and getting more public input on a sense of having activity, at least one trip some level of revenue connection to a project area in three out of the last ten years, before the project basically investment decision was made final. That is the current thinking about what the eligibility standard would be.

There definitely would be an exceptions process that vessels, you know if they fall outside of that there could be this other way to still be considered, if they have some unique circumstances that should be considered. Finally, the next steps, just to give you a sense of what is ahead.

Just earlier this week the DOC, the group I mentioned before met, and basically their final meeting before the draft would be released. It's being finalized now. Again, hoping to release the draft later this month, very early September. There will be, although it's not required, a formal public comment period where the document will be available online.

Folks can send and submit comments directly through the website and an e-mail address provided during September and October for a minimum of 45 days. There will be a public webinar. Staff is also going to present at the upcoming New England and Mid-Atlantic Council meetings during that public comment period.

If there are states online that want to try to coordinate something with us in addition to those opportunities, please reach out about that. Finally, later in the fall there would be a final, and then another webinar to take all of that input, make any necessary updates and release the final before the end of the year.

Finally, the last slide I have is just the website, essentially, to let you know there is more information on there if you are curious to dig into this a little further. The actual draft will be posted. We'll send a notice to Commission staff, and they are welcome to forward it to everyone to know when it is available.

Definitely encouraging folks to view it. There will be public webinars to kind of walk through it, and very open to suggestions and ways to improve it. Thank you so much for your time, if we have any time left, I am happy to take questions. Otherwise, please send an e-mail to the address on the screen, or get in touch with me directly. Definitely appreciate your time.

CHAIR McKIERNAN: Thank you, Deirdre, and thank you for all the work that you and the team are doing. I know my state supported the development of this group to bring about some logic and order to the various agreements each developer was making with each different state, so this makes a lot of sense.

Even though you mentioned that you're not covering what money goes in, I really believe that the net result of all your efforts is going to be kind of a shift in the thinking of what money should go in, in the future. I think there will be some net benefits in that realm as well. Any comments or questions for Deirdre? Yes, Rich Wong.

MR. WONG: Deirdre, could you elaborate a little bit more on the separate program, the addition of conversation for the Export Cable Route, because this is occurring in state waters, and using a different pool of money than the offshore compensation.

MS. BOELKE: Sure. I am happy to do that a little bit. There is not really too much detail. I was going to say we can go back to Slide 7, but there is really nothing on there anyway. Again, this process again was just mentioning won't get into the value of what is available. But whatever the RFA is instructed from that agreement, and whatever fund dollar amount is available.

The current draft is thinking that for that Export Cable Corridor Area there would be a buffer that is recommended around either side. The premise would be an optional kind of one-time advance payment, you know before construction even starts, to any affected vessel that can show that there was some demonstrated connection to that offshore area with a buffer.

Right now, the draft considers 500 meters around that cable centerline. The thinking is that it would be one payment amount, and once they know that amount that is available and how many people are in there, that amount would be more known than it is today, like we have essentially no idea what the funds values would be.

If a vessel decides to participate in that, submit into that program, there would be an agreement not to fish in that cable corridor area during the construction period. Without going into lots of the details now, there are pros and cons of that. But that is currently how the draft is developed. Does that help a little bit? There definitely will be a lot of details about this in the draft when it's released.

CHAIR McKIERNAN: Rich, follow up?

MR. WONG: Yes, thank you, Deirdre, I was just actually curious about the export cable wrap that goes through state inland waters, or are you referring just to the export cable wrap that is in the ocean?

MS. BOELKE: Sorry, not to hone in on that, but the sense is that program would work the same, in terms of the rules of who could apply and who could be eligible. In terms of limitations on, if it comes from a certain state water account or a federal water account. That could be addressed in the background, but the idea is that the draft currently is suggesting that the rules apply the same, if I'm touching your question.

CHAIR McKIERNAN: Seeing no more hands up, thanks for the presentation, Deirdre, and good luck getting that over the goal line.

UPDATE ON RECREATIONAL ANGLER PARTNERSHIP IMPROVEMENT DIRECTIVE

CHAIR McKIERNAN: Next on the agenda is a RAPID update from Alex DeJohnson.

MR. ALEX DiJOHNSON: I'm just going to give a pretty quick update. I think a lot of resource has already been released about where we are with the Recreational Angler Partnership Improvement Directive, and I've had a good opportunity to talk to a lot of folks so far being here yesterday, just sort of catch up and hopefully answer some questions that folks are having about where this directive is moving.

Just really quickly I wanted to highlight a few things out loud for folks, one of them just being that the RAPID is intended to sort of be a transition from the existing data collection enterprise to some new ideal version. What we're looking at here, and what we think we would gain is the need to have a couple of workshops, regional workshops throughout the nation to sort of figure out what this ideal version would look like.

I think the Steering Committee has been really adamant about making sure that we are communicating that there are no predetermined outcomes. We don't know what the future state is going to look like, in the different regions, different coasts. We're here to sort of work through this with the partners, and part of that is going to be what we call extending.

I sort of think of it as maybe refreshing, some of the shared governance relationships with partners for state, federal, Commission, Council and then also obviously the stakeholder is going to be setting a

direction in this codesign approach to improve trust in and quality of the data that are being collected for use in management.

The sub-bullet under there I think is important, something that maybe should have been even more bold. It's just the idea of what that could look like. We have a couple of different options; we just outlined the three easiest options here. But the idea is, there is potential to sort of enhance existing data collection methods.

We could supplement the existing methods or we could potentially look at replacing those methods. There are a number of different approaches beyond that, but those are sort of the easiest to reach, sort of what I offer right now, as we think about planning these workshops.

Then the last thing I wanted to just reiterate that I think has been really clear in my communication so far. But in the Atlantic especially, this data collection that exists already is going to continue as is until the future state is designed and being executed. For now, the current state, the current status on the Atlantic will continue forward.

Rather than go through in a lot of detail, the page that was released back in June 8 of this year has a lot of detail in what is going on in there. That page is intended to sort of be a living, breathing version of what the current update is on RAPID. That could be updated every week, but the idea is that any major updates about what is going on, progresses of RAPID can be found on that page. It's just a website page that has been distributed widely at this point on the NOAA Fisheries site. Some of the updates since the last ASMFC meeting in May was that the Workshop facilitator that is going to be Keystone Policy Center, has actually been hired at this point. They actually just had a first sort of kick-off call earlier this week.

We ended up with 8 applicants for the RFP, so it was pretty competitive. There was a lot of really good proposals that came through. But we are really excited with Keystone. That closed in mid-June. They are actually going to be joining the Steering Committee starting today at 1:00 p.m. continuing into the future.

We're excited to have that facilitator on, because we wanted a lot of feedback on the facilitator about how those workshops are going to be run and organized. Then one of the other items that has been solidified has been an increase to the APAIS allocation brought for the Atlantic, that is Maine down through Georgia.

We ended up with about a 13% increase September through December of this year, which is no nothing, essentially a pretty nice increase. Then we're working on having, it will probably end up being more like a 20 to 30% increase, maybe a little bit higher throughout all of 2027. We will be finalizing that increase late this year, probably in November for 2027 for the rest of the Atlantic.

One of the biggest things that you all have probably heard about and maybe have questions about would be that we are solicitating sort of members for these Regional Planning Teams. They are going to be helping with the logistics, then also be setting the agendas and planning each regional workshops.

I think at this point pretty much covered everyone, all the different regions. But if you have additional thoughts, obviously, I think Bob reached out last week, I think that was, for requests. I think we pretty much heard back from everybody, but if you have additional thoughts, let us know. Then we should be having communication finalizing those groups, and setting up the first meetings, maybe this week.

Definitely by the end of next week though I would say this communication should be going out. Then one of the last things that we've been working on is a formal communications plan about exactly what is the plan with RAPID and where this directive will be moving forward.

I think a part of that will also involve reaching out, maybe for a little bit of the state communication ideas, to sort of make sure that we're using s standard voice, a singular voice to move forward

with feedback from all the different partners, not just having communications come from one partner, sort of a countdown approach.

Where we're going. I would say that these timelines are best guesses right now, that this will sort of be solidified a little bit more once we have these Regional Workshops planning committees sort of set up and thinking about when these meetings are going to be, how many meetings we even are going to have. But right now, the idea is that we need to first have an inventory. That was one of the things that we were waiting for the facilitator to jump on. Now that we have the facilitator, we are going to be starting that maybe even in August, definitely by September to start that. That is one of the first pieces that needs to go into the planning of these workshops.

Then obviously, we need to actually hold the workshops. Right now, the rough timeline we've been saying is something like October through March. The reason we're ending in March of next year. The goal is right now to make sure that we're not rushing anything, we want to make sure that there is actually quality through these workshops, obviously, understanding that we do want to do this quickly, but we also want to do it right.

Then we're also trying to do, we're targeting March, because that would get us before the Rec Summit, the 2027 Rec Summit, because we plan on having this, at least a piece of that summit that is currently planned for, I think it is the 23rd or 24th of March. But that is also key for the summit. After the workshops, the workshops are sort of going to be rolling.

They are not going to happen all at once. It will be over the course of weeks/months. We plan on just having a rolling synthesis of what comes out of those workshops, because a part of that will be to have not just regional workshops with management, but also to have a public workshop, and then to have one final workshop at the very end to help synthesize everything collectively. That is going to be done on a rolling basis. Then we want to have the regional reports and action plans at least drafted by May 2027. Then we're hoping to be able to announce and then start executing what that future state of data collection would be in summer of next year. With that I can take any questions.

CHAIR McKIERNAN: Any questions for Alex? Go ahead.

MR. LOREN W. LUSTIG: Thank you very much for a very interesting report to us. I am wondering if you could be specific regarding the lack of trust issue that you brought up. What is the cause of a lack of trust in the current programs that are producing data, and what would be helped by the new RAPID proposal that you put on the table?

MR. DiJOHNSON: The easiest answer is that I hope that that comes out in the workshop. But I think that the trust component is sort of twofold, right? There is sort of constituents, the public and building trust. But I think the more important piece that we're hoping to tackle in the workshops is trust.

Buy-in through a reenvisioned partnership between states, federal, NOAA Fisheries as well as with the Council's and Commission, sort of have everybody together designing. The idea is that by building that system together that the trust would be built in, sort of differently than it exists right now, which tends to be a little bit more top down from NOAA down.

CHAIR McKIERNAN: Good question, Loren. Anyone else? I've got Joe Cimino.

MR. CIMINO: I promise I know that I am no longer Chair. I wanted to make a comment, not to Alex's work. I appreciate all that Alex and Jeff and Bob are doing on this. You know we're a group of member states, but I really feel no one better could do the work that is being done by the Commission on this.

I feel it was kind of foisted on us. I kind of wrestle with that a little. Not necessarily saying that we should maybe go as formal as a letter to the Service.

I had a chance to talk to some of the folks from NOAA at the State Director's Meeting and at the CCC. I know as individuals I really appreciate the work that the Commission has taken on for this. I don't feel like, for something this big, that we had a real discussion in how this was coming to us.

CHAIR McKIERNAN: All right, we'll take that under advisement. You got that off your chest, Joe? All right, anyone else?

STOCK ASSESSMENT UPDATES

CHAIR McKIERNAN: Next on the agenda is Stock Assessment Updates, Katie Drew, oh, Toni is going to cover it, very good.

MS. KERNS: In order to end on time is the end desire. The croaker assessment had its peer review last week, and it will be coming at the annual meeting. The sturgeon will have a workshop next week. If you have further questions about it then see Katie.

CHAIR McKIERNAN: Brilliant, Toni. We have no non-compliance findings. Any other business at this time? John Clark.

MR. CLARK: This is the topic I mentioned to you, Dan. I know everybody want to get out of here, I'll be extremely parsimonious with my palaver here. We just want to bring up the issue. We were approached by anglers in Delaware through our Tidal Finfish Council about putting regulations in place for sheepshead, since we're seeing a lot more sheepshead being caught.

Delaware's laws don't allow us to regulate a tidal species that does not have an FMP, but it does allow us to create and FMP with New Jersey. We contacted Joe Cimino and his staff in New Jersey, and they've also been hearing the same thing. Just wanted to make the Board aware that we're looking at developing an FMP For our two states.

But Joe's state put together a chart showing that pretty much every state south of Delaware already has regulations in place. I don't know if sheepshead might be something on the horizon that ASMFC might want to consider management. I'm sure Bob and Toni are glad to hear that.

CHAIR McKIERNAN: Bob and Toni, would you like to respond? Go ahead, Bob.

EXECUTIVE DIRECTOR BEAL: Thanks, John, it's good to keep those additional species on the radar. You know we've had a number of suggestions on additional species, including southern flounder, the welk fishery and I know there are a couple others that are out there, I guess false albacore and some others.

It's a bandwidth issue, really. If we take on additional species, do we sort of reduce priority for some of the existing species? Easy to say. If the Policy Board wants to have that conversation and those states want to bring something forward, we can have that conversation, for sure.

ADJOURNMENT

CHAIR McKIERNAN: John, thanks for the heads up and good luck with your collaboration with New Jersey. I think that brings us to the end of the meeting. Any objection to adjourning? No objection meeting is adjourned.

(Whereupon the meeting adjourned at 11:40 am on Thursday, August 6, 2026)

Recreational Sector Separation Amendment to the
Summer Flounder, Scup, and Black Sea Bass and Bluefish Fishery Management Plans

Action Plan
As of October 2026

Amendment Goal: This amendment is being developed by the Mid-Atlantic Fishery Management Council (Council) and Atlantic States Marine Fisheries Commission (Commission). The purpose of this amendment is to review and consider options for managing for-hire recreational fisheries separately from other recreational modes (referred to as sector separation or mode management) as well as options related to for-hire permitting and reporting requirements for the summer flounder, scup, black sea bass, and bluefish fisheries.

Recreational mode management is being considered as a potential way to account for differing motivations, preferences, fishing behaviors, economic considerations, operational needs, and data reporting requirements between for-hire vs. private/shore components of the recreational fisheries. Revisions to the Recreational Measures Setting Process, the conservation equivalency process, and recreational accountability measures may be considered if needed to implement mode management approaches.

Additional for-hire permit and/or reporting requirements will also be considered with the goal of ensuring the effectiveness of any sector separation approaches. Limitations may be needed on the flexibility of fishery participants to enter and leave the for-hire sector at will based on preferred regulations under sector separation, and increased consistency in state for-hire permitting and reporting requirements may be needed to effectively analyze mode management approaches going forward.

Types of Measures Expected to be Considered: The Council and the Commission's Interstate Fisheries Management Program Policy Board (Policy Board) have agreed to consider the conceptual approaches listed below. These approaches are currently being further developed to add additional detail and sub-options as appropriate.

Recreational Sector Separation

- No action/status quo
- Managing the recreational for-hire and private/rental fisheries with separate management measures (bag limits, size limit, seasons, or other measures). Although this is already done for some species/state/mode combinations, this amendment may consider a more uniform approach to separate measures, including the potential development of guidelines or specific requirements to consider or implement mode management approaches. If the Council and Policy Board choose to prioritize separate measures over other types of sector separation, an amendment may not be necessary depending on the options considered.
- Managing the recreational for-hire and private/rental fisheries with separate management measures (bag limits, size limit, seasons, or other measures) and a separate timeline. This would allow for-hire measures to remain stable over multiple recreational measures setting cycles to

accommodate the differing needs and priorities of the industry. The Council and Policy Board directed the development of this alternative in February 2026.

- Letter of Authorization (LOA) program for separate for-hire measures. The Council and Policy Board are considering whether a special program could allow authorized for-hire vessels to opt into a specialized set of recreational management measures tailored specifically for the for-hire mode, while still meeting the overall conservation objectives.

For-Hire Permit Requirements

- No action/status quo
- Limitations on the total number of for-hire permits (federal and/or state level)
- Additional or modified requirements to obtain or retain a federal and/or state for-hire permit
- Requirements that states implement permitting and/or reporting requirements at the state level

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.

Name	Agency	Role/Expertise
Tracey Bauer	Atlantic States Marine Fisheries Commission	FMAT/PDT Co-Chair
Chelsea Tuohy	Atlantic States Marine Fisheries Commission	FMAT/PDT Co-Chair
Kiley Dancy	Mid-Atlantic Fishery Management Council	FMAT/PDT Co-Chair
Hannah Hart	Mid-Atlantic Fishery Management Council	FMAT/PDT Co-Chair
Savannah Lewis	NMFS Greater Atlantic Regional Fisheries Office	Fisheries policy and legal requirements
Marianne Randall	NMFS Greater Atlantic Regional Fisheries Office	National Environmental Policy Act requirements
Sara Turner	NMFS Greater Atlantic Regional Fisheries Office	Scientific and technical analysis of federal fisheries management
Rachel Sysak	New York Department of Environmental Conservations	State fisheries management
Corrin Flora	Maine Department of Marine Resources	State fisheries management
Matt Ayer	Massachusetts Division of Marine Fisheries	State fisheries management
John Lake	Rhode Island Division of Marine Fisheries	State fisheries management
Craig Weedon	Maryland Department of Natural Resources	State fisheries management

Expected Amendment Timeline:

This amendment was initiated in October 2020 along with several other Recreational Reform Initiative Topics. However, in February 2021, work on this amendment was put on hold to prioritize development of the Recreational Harvest Control Rule Framework/Addenda. In December 2022 the Council and Policy Board agreed to continue to develop the Recreational Sector Separation and Catch Accounting Amendment; however, it was later put on hold again to prioritize development of the Summer Flounder Mesh Exemptions Framework/Addendum.

In December 2025, the Council and Policy Board agreed to delay development of a public hearing document/draft Amendment document in order to hold a workshop to further refine the draft alternatives. A revised amendment timeline is below (as of October 2026; pending additional guidance from the Council and Policy Board). However, **this timeline is subject to change depending on the outcomes of the workshop** and how those outcomes ultimately impact the range of alternatives and level of analysis required.

Fall 2024	Confirm/Finalize Fishery Management Action Team (FMAT)/ Plan Development Team (PDT) Membership; Development of draft scoping/public information document
December 2024	Council and Policy Board approve a scoping and public information document for public comment
February/March 2025	Scoping hearings and comment period
March 2025	FMAT/PDT and APs review scoping comments and provide input to Council and Policy Board on scope of amendment and possible approaches
April 2025	Council and Policy Board review scoping comments and FMAT and AP recommendations; define scope of action
Summer 2025	FMAT/PDT begins to develop draft alternatives
August 2025	Council and Policy Board review and provide feedback on preliminary conceptual alternatives
Fall 2025	Continued FMAT/PDT development and analysis of alternatives; AP input on draft alternatives
December 2025	Council and Policy Board provide further guidance on draft alternatives for inclusion in a public hearing document/Commission draft amendment document
Winter/Spring 2026	Staff work with FMAT/PDT and Council/Policy Board leadership to plan stakeholder workshop logistics, including identifying a workshop facilitator
Spring/Summer 2026	FMAT/PDT work with facilitator to prepare workshop materials and identify participants
September 2026	Stakeholder workshop to further develop draft alternatives
November 2026	Council and Policy Board review workshop results and provide direction to FMAT/PDT
January 2027	Council and Policy Board approve a range of alternatives for inclusion in a public hearing document/draft amendment document

Winter 2027	FMAT/PDT develops public hearing document/Commission draft amendment document
Spring 2027	Council and Policy Board approve public hearing document; Policy Board approves draft amendment document for public comment
Spring/Summer 2027	Public hearings and comment period
Summer 2027	AP meeting to provide input on preferred alternatives; FMAT/PDT meeting to provide recommendations to Council/Board
August 2027	Final action
Summer/Fall 2027	Staff develop and submit draft environmental assessment (EA)
TBD	NMFS and other agencies review EA; final edits completed; Rulemaking and comment periods (4-7 months after EA finalized)

Recreational Sector Separation Amendment

Summary of Draft Alternatives Under Development – November 2026

Background

The Mid-Atlantic Fishery Management Council (Council) and Atlantic States Marine Fisheries Commission (Commission) Policy Board (Policy Board) are developing an amendment to consider modifications to the recreational management program for summer flounder, scup, black sea bass, and bluefish. Specifically, the draft alternatives below describe alternatives for managing for-hire vessel recreational fishing separately from other recreational fishing modes (i.e., private/rental vessel and shore-based) as well as alternatives related to for-hire vessel permitting requirements for the summer flounder, scup, black sea bass, and bluefish recreational fisheries.

The current draft alternatives described below were discussed at the Recreational Sector Separation Workshop held in Linthicum, MD on September 23-24, 2026. A separate workshop report summarizes participant feedback on these alternatives and is included in the meeting materials for the November 12 Policy Board and Council meeting in Newport, RI. **The draft alternatives below have not yet been modified based on workshop feedback. At their joint meeting on November 12, the Council and Policy Board should consider recommendations from workshop participants and provide direction to the Fishery Management Action Team/Plan Development Team (FMAT/PDT) on further development of the alternatives, including which alternatives should be carried forward, which require modification or further development, and which alternatives should not be carried forward.** In addition, the Council and Policy Board could identify additional information, and analysis needs to inform final approval of a range of alternatives in early 2027 (see Action Plan as of October 2026 also included in the meeting materials).

Management approaches that were previously considered but removed from further consideration in this action are described in Appendix A. It is important to note that one of the alternatives removed from consideration was separate allocations of catch or harvest to the for-hire and private fishing modes. As such, the draft alternatives below do not include any approaches that would establish mode-specific allocations.

Draft Purpose and Need Statements

In late 2025, the FMAT/PDT worked to revise the draft purpose and need statements for this action, based on feedback received from previous discussions of the Council and Policy Board

and advisors (summarized in the December 2025 Discussion Document). The current purpose and need statements, as revised, are as follows:

- **Purpose:** The purpose of this action is to evaluate whether the for-hire and private angler components of the recreational fisheries, also referred to as modes, for summer flounder, scup, black sea bass, and bluefish should be managed separately. The action also seeks to determine whether additional permitting and reporting requirements are needed to support this approach. Together, these considerations are intended to improve the responsiveness of management to the needs of recreational stakeholders across the two modes.

- **Need for action:** Currently, the for-hire and private recreational modes are managed under a single combined harvest target in each year for each species. However, management measures designed to achieve that target (i.e., bag limits, size limits, seasons, and other requirements) can vary across modes in some cases. To date, these types of "mode management" approaches have been implemented in an ad hoc fashion, usually at the state level, with varying approaches for different species and regions. Managers have expressed a desire for greater consistency in the application of mode management by species and state/region, and for an increased use of mode management approaches where necessary to support the unique needs of the for-hire sector and to better tailor management to the unique characteristics of each recreational fishing mode.

  Differing management measures by mode can better account for mode-specific differences in operations, incentives, reporting practices, and economic vulnerability. For-hire operators must manage fixed business costs and depend on predictable regulations for financial planning and trip marketing. Advisory Panel Fishery Performance Reports in recent years have consistently raised concerns about declining for-hire participation and economic viability in some areas, and the Mid-Atlantic State of the Ecosystem Report indicates a trend of declining recreational fleet diversity due to a shift away from party/charter fishing. Private anglers have more flexible participation patterns and different financial considerations based on personal expenses as opposed to business profitability. A single set of recreational measures may therefore distribute constraints unevenly and create management outcomes that are not well aligned with the needs of each group.

  Additional permit and reporting requirements may be necessary in order to support effective implementation of mode management approaches adopted through this action or via future actions. Federal for-hire permits are currently open access, with few eligibility criteria, and state level permit requirements vary widely. This flexibility allows participants to move in and out of the for-hire mode based on preferred regulations, which could undermine the effectiveness of mode specific measures. Increased consistency among states in permitting and reporting requirements would also improve the ability to analyze and apply mode-based regulations for the full recreational fishery.

Alternative Set 1. Recreational Mode Management Guidelines

Concept: Set different management measures (size/bag limits, seasons) by recreational mode without separate sub-allocations of catch or harvest. Different approaches could be taken for different species.

Draft Alternatives:

1A. No Action/Status Quo. Continued use of mode management for each fishery at the state and/or federal level (most commonly at the state level). Current approach: Flexible, state-tailored, ad hoc, variable by species.

- *Black Sea Bass/Summer Flounder:* Annual determination whether to manage the recreational fishery under 1) coastwide measures or 2) conservation equivalency (state- or region-tailored management that applies to federal waters).
- *Scup/Bluefish:* Recreational measures in federal waters cannot be waived in favor of state measures. State measures can differ from federal waters measures if they are more restrictive.

Please see the Current Use of Mode Management background document for additional details on how mode management is currently applied.

1B. Uniform Approaches or Guidelines for Considering Mode Management. The current approach varies by species and area (e.g., differences in state/federal measures, across which modes measures vary, etc.). This alternative would consider establishing either binding or non-binding guidelines or best practices for implementing mode management to increase the use of mode management or increase consistency in its application. If the Policy Board/Council wishes to specify, this alternative could include specific considerations to implement mode management between different modes, e.g., the private and for-hire modes, private shore and private vessel, etc. Approaches could include:

- Recommended analytical approaches
- Degree of difference between measures by mode (e.g., whether there should be a minimum or maximum amount of difference across different modes)
- Approaches to minimize enforcement concerns

> ***A key consideration:*** The current process is already flexible in allowing mode management approaches to be implemented at the state level. There are tradeoffs between increased consistency in the application of mode split regulations across species and regions, and the existing flexibilities for states to implement mode management approaches tailored to the needs and preferences of their anglers. The FMAT/PDT found it challenging to develop mode management guidelines that did not limit this flexibility or otherwise make the recreational measures process more restrictive.

1C. For-Hire Resiliency Measures Setting Process. Would modify the current Recreational Measures Setting process. Specifically, this approach would modify the recreational measures setting process timeline for the for-hire mode, and allow for-hire measures to be set every four years as opposed to every two years, with the following exceptions:

- If annual directed effort significantly increases for the for-hire mode (threshold TBD)
- If annual harvest significantly increases for the for-hire mode (threshold TBD)
- If the Recreational Measures Setting process indicates that a total harvest reduction of greater than XX% is needed (threshold TBD)
- If the Recreation Demand Model (RDM) used to estimate the impact of management measures changes significantly or if modifications to the model show significant changes in estimated harvest (e.g., due to a recalibration of MRIP data)

> ***A key consideration:*** In years when measures are set for both modes, measures could be developed based on a rolling percentage of catch and/or effort by mode from recent years, or via some other approach. In years where the for-hire measures do not change, additional discussion is needed to determine how private mode measures may need to be adjusted to meet the requirements of the Recreational Measures Setting Process.

1D. Regional For-Hire Measures. Would apply regional for-hire measures (size/bag limit/ season) to two or three regions along the coast, likely applied as identical measures in state and federal waters. States could deviate only if measures are more restrictive than regional measures. This approach is already used (or required) to some extent in state waters for summer flounder, black sea bass, and scup (see the Current Use of Mode Management background document for additional details). If this approach is carried forward for further development, it is possible that the existing regions for summer flounder and black sea bass will be reevaluated. Additionally, different approaches may be needed for scup and bluefish as conservation equivalency is not available for these species.

1E. Letter of Authorization (LOA) Program for Federally Permitted For-Hire Vessels. Would enable federally permitted for-hire vessels to opt into a specialized set of recreational management measures (e.g., size, bag, season) different from state, regional, and/or coastwide measures tailored specifically for the for-hire mode that would still meet the overall conservation objectives. Alternatively, other types of flexibilities (TBD) could be offered to LOA holders aside from specific measures.

Key elements:

- Voluntary (annual or every two years); eligibility criteria may be established
- Would require state agreement/authorization for participants to apply – states would not be required to participate (participants would need to land in a participating state)
- Participants subject to enhanced reporting or other additional requirements (TBD)
- Would become part of the routine recreational measures setting process

Letter of Authorization (1E)—Draft Sub-Alternatives:

1E-1. Participating Species	1E-2. Length of Participation	1E-3. Eligibility for LOA	1E-4. Additional Reporting Requirements	1E-5. Regional Configuration of LOA Program
1E-1-a. All four species **1E-1-b.** Species eligible for conservation equivalency (CE) (summer flounder, black sea bass) **1E-1-c.** Species not eligible for CE (scup, bluefish)	**1E-2-a.** Annual–states opt-in and participants apply for LOA program on annual basis. **1E-2-b.** Length of specifications–states opt-in and participants apply only when for-hire management measures are specified.	**1E-3-a**. Any federal permit-holder (if state has opted into LOA program) **1E-3-b**. Additional eligibility criteria (e.g., control date, activity level, additional reporting)	**1E-4-a**. Must complete and cooperate with surveys (e.g., requirement to participate in For-Hire Survey) **1E-4-b**. Flexible Data Gap Reporting–required collection of specific data gap elements.	**1E-5-a.** Regional LOA Program with regional LOA measures specified in this action (no more than two regions) **1E-5-b**. Regional LOA measures with regions set via measures process (regions adopted at same time as measures) **1E-5-c.** Coastwide LOA measures

1F. One-Time Baseline Measures Recalibration for For-Hire Vessels. Previously, some stakeholders and Council/Policy Board members have suggested that mode management alternatives should include a one-time "reset" of measures for the for-hire fishery. This would involve resetting for-hire measures to measures similar to those in years prior to recent restrictions, and/or to measures that have previously allowed the for-hire fisheries to operate more successfully than under current conditions.

This draft option was included in the background materials for stakeholder workshop discussion; however, there are concerns about whether it is within the scope of this action. In addition, when this topic was raised during the development of a previous action, an appropriate method to quantitatively determine the basis for "reset" measures could not be determined. The RDM is currently configured to analyze regulations for 2026 using recent historical data and projected stock conditions for 2026. In its current configuration it cannot be used to analyze regulations using past conditions or retrospective analyses; it can only evaluate proposed measures looking forward. In order to quantitatively develop a recalibration of measures based on historical effort patterns and management measures, a new methodology

and analysis process would need to be developed, which is likely outside of the scope of this action and would require additional work and support.

Alternative Set 2. Federal For-Hire Permit Requirements

Concept: The goal of this alternative set is to increase the effectiveness of any mode management approaches by limiting the ability of anglers to freely switch between the for-hire and private modes to take advantage of specific measures or programs. However, some of the permitting reforms described below could also be considered independently of mode management. Note that Alternative Set 2 applies only to federal for-hire permits, while Alternative Set 3 addresses state permitting.

Draft Alternatives:

2A. No Action/Status Quo. Federal for-hire permit requirements and qualification criteria for these four species would remain unchanged (open-access, issued by species, associated with a particular vessel, may be dropped/added at any time). A characterization of recent federal permit utilization can be found in Appendix A of the December 2025 meeting materials.

2B. For-Hire Permit Capacity Limitations. Would address concern that under mode management any angler could easily obtain (or drop) a permit to fish under for-hire (or private) measures if desired. None of these alternatives would impact state-level for-hire permits.

For-Hire Permit Capacity Limitations Sub-Alternatives:

2B-1. Moratorium on new for-hire permits.	2B-2. Limited entry system with qualification criteria designed to reduce latent effort.	2B-3. Tiered Permit System.
Intent: Limit number of federal permits to recent levels – no new permits issued to those who hadn't been issued one prior to the control date (2/11/2025). Transfers allowed. ● **2B-1-a.** No sunset provision. ● **2B-1-b**. 5-year sunset provision (could use this time to consider transition to permanent limited entry system).	**Intent:** "Active" permits with reported harvest are only 22-37% of total issued species-specific for-hire permits→ this alternative would limit permits to recently active vessels in these for-hire fisheries, with different levels of activity thresholds considered in the different sub-alternatives below. ● **2B-2-a.** Have submitted at least one for-hire VTR in last five years. ● **2B-2-b.** Have submitted at least one for-hire VTR in at least 3 of last 10 years. ● **2B-2-c.** Have reported landings of the relevant species at least once in last 10 years. ● **2B-2-d.** Have reported landings of the relevant species in at least three of last 10 years. ● See table below for qualification criteria statistics **Sub-alternatives to allow new entrants (feasibility still TBD):** ● **2B-2-e.** Relinquished permits into new entrants pool, with availability based on waiting list. ● **2B-2-f.** Relinquished permits into new entrants pool, with availability based on lottery (likely the least complicated) ● **2B-2-g.** Issue new permits to special new entrant program (e.g., student/apprentice permits with special requirements TBD).	**Intent:** Establish two levels of federal for-hire permits based on activity level. Note that this option has some similarities to the LOA program alternative. **Tier 1:** Active participants: requires meeting a certain threshold of activity (TBD). Measures to meet needs of the for-hire sector **Tier 2:** Open access. New entrants or part-time vessels who do not frequently fish or target these species. Measures would likely match private mode or possibly developed specific to Tier 2 permit holders.

For-Hire Permit Capacity Limitations Sub-Alternative 2B-2. Qualification Criteria: Summary of vessels with for-hire permits for summer flounder, scup, black sea bass, and bluefish from 2016 – 2025. Source: GARFO APSD, October 2026. "Vessels with at least one VTR" means any for-hire VTR was submitted without consideration of species landed. "Reported landings for relevant species" means that landings were reported for the species in that row. The maximum number of permits issued in any given year between 2016 and 2025 is provided for reference.

Qualification Criteria Sub-Alternatives	Summer Flounder	Scup	Black Sea Bass	Bluefish
2B-2-a: For-hire vessels that have submitted at least one for-hire VTR in the last 5 years (2021-2025)	757	680	775	803
2B-2-b: For-hire vessels that have submitted at least 1 for-hire VTR in at least 3 out of the last 10 years (2016-2025).	602	533	599	627
2B-2-c: For-hire vessels that have reported landings of the relevant species at least once in the last 10 years (2016-2026).	638	446	691	617
2B-2-d: For-hire vessels that have reported landings of the relevant species in at least 3 out of the last 10 years (2016-2025).	373	263	406	346
Max. number of permits issued in any one year 2016-2025	1027	891	1033	1023

2C. Require Minimum Threshold of Participation in the For-Hire Survey: This alternative would establish a certain threshold (TBD) of for-hire survey participation with the aim of enhancing for-hire data collection, potentially in combination with other alternatives that provide additional flexibilities to for-hire participants.

Alternative Set 3. State-Level Permitting and Reporting Requirements

Concept: State-level permitting and reporting are currently highly variable across states; increased consistency would enable better evaluation of the performance of mode management measures.

Draft Alternatives:

3A. No Action/Status Quo. As of 2026, 13[1] of 14 states have a state-level permit for charter/party vessels (none are species-specific), with three (NY, MD, VA) having some form of limited entry. States have a wide variety of reporting requirements.

[1] Although New Jersey does not require an explicit for-hire permit or license, all for-hire owners and operators are required to register their vessels annually with the New Jersey Saltwater Recreational Registry Program, with strict penalties for operating without a registration.

3B. Require state-level for-hire limited entry programs. Could be limited to the four species in question or broadened, with qualification criteria determined by each state. More than half of the states have reported legislative and/or regulatory burdens that implementing such a program would entail.

3C. Require state-level for-hire reporting. Would adopt minimum requirements for state for-hire reporting for the four species (states would determine exact requirements and whether to limit to the four species or broaden). Several states have noted financial/administrative burdens associated with developing/implementing such a program.

> ***A key consideration***: This set of alternatives has yet to be discussed in great detail by the Council and Policy Board. It is likely that changes to state level reporting requirements will be challenging for some states due to existing legislation, state decision making processes, and/or other limitations. Council and Policy Board members should consider these barriers and the potential need for extended implementation timelines when reviewing the alternatives in this section. It should also be considered that changes may be needed at the state level to complement changes at the Federal level to prevent equity access concerns between state and Federal permit holders.

Appendix A: Alternatives Previously Considered But Rejected

Alternatives are still being refined and added to the Amendment. However, there are several alternatives that have been proposed in the past but were subsequently rejected for inclusion in the Amendment by the Council and Commission and will not be discussed further as part of this action.

These include:

- **Separate sub-allocations for different components of the recreational fishery** (for example, separate overall catch limits for for-hire and private modes) (removed by the Council/Policy Board in August 2025); the recreational fishery as a whole will continue to be managed under a single Recreational Harvest Limit, Annual Catch Target, and Annual Catch Limit. These alternatives were removed due to concerns about extending the amendment timeline and adding complexity to the fishery management plans, as well as concerns about uncertainty in the mode-specific data that would inform separate allocations.

- **Coastwide for-hire measures for a given species** (as opposed to region-specific for-hire measures). The Council and Commission chose not to further pursue this alternative. This decision was due in part to the coastwide variability in a) species availability and b) the behavior and preferences of anglers who target these species, which could make agreement on uniform measures across states difficult. In addition, there were concerns

regarding the mechanics and timeline associated with implementing coastwide measures, including the ability to conduct the needed analyses.

- **Requirements for considering or implementing mode management at the state level.** This alternative would have modified the Commission's Fishery Management Plan to require consideration of mode management at the state level. There was concern that such a requirement could limit process flexibility and also increase workloads/costs associated with developing and analyzing the impacts of alternatives.
- **Temporary limitations on the ability to renew inactive federal for-hire permits**. This alternative was removed in August 2025 due to concerns that it would not address the needs of this action and that permit inactivity can be driven by regional and temporal variations in availability.

Recreational Sector Separation Stakeholder Workshop



A Workshop of the Mid-Atlantic Fishery Management Council and Atlantic States Marine Fisheries Commission

September 23-24, 2026
Sheraton Baltimore Washington Airport Hotel
Linthicum Heights, Maryland

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

ATLANTIC STATES MARINE FISHERIES COMMISSION

Image: On The Water Media

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EXECUTIVE SUMMARY

On September 23–24, 2026, the Mid-Atlantic Fishery Management Council (Council) and Atlantic States Marine Fisheries Commission (Commission) convened the Recreational Sector Separation Stakeholder Workshop in Linthicum Heights, Maryland. The workshop brought together 22 stakeholders representing charter and headboat operators, private recreational anglers, supporting businesses, and advocates from along the U.S. east coast. The workshop sought to gather stakeholder input to inform continued development of the Recreational Sector Separation Amendment (Amendment), which is considering approaches for managing the for-hire and private recreational fishing modes separately for summer flounder, scup, black sea bass, and bluefish, along with related permitting and reporting requirements.

Through facilitated plenary discussions and breakout sessions, participants reviewed draft Amendment alternatives, identified potential refinements and additional approaches, and discussed implementation challenges and data/analysis needs. Discussions highlighted substantial interest in changes to recreational management approaches that better account for the differing needs of fishing modes and support viable for-hire fisheries. However, participants also emphasized the importance of maintaining opportunities for private anglers, avoiding unintended barriers to for-hire participation, and accounting for differences among species, regions, and fishing operations.

Key Findings

Table ES-1 summarizes the principal findings and areas of agreement emerging from workshop discussions. Characterizations of agreement reflect the facilitator's qualitative assessment of expressed perspectives rather than formal votes or consensus positions. Not all participants expressed views on every topic, and agreement on general management principles did not necessarily extend to specific alternatives or implementation details.

Table ES-1. Summary of key findings and areas of agreement at the Recreational Sector Separation Stakeholder Workshop.

Topic/Alternative	Key Findings and Areas of Agreement
Overarching Comments	Participants across roles recognized the need for action to provide relief to the struggling for-hire fleet. Broad support for removing bluefish from further consideration in the Amendment, with one opposing view.
Mode Management: Overall	Broad interest among for-hire participants in separate management measures for the for-hire and private modes. Participants emphasized the importance of accounting for species- and region-specific differences, while concerns were raised regarding impacts on private anglers, accountability, and transparency in development of measures. Substantial interest in exploring shore-based measures, particularly lower size limits, but differing views on whether these should be developed through the Amendment or by individual states.
For-Hire Resiliency (Alt. 1C)	Participants generally viewed the potential risks of a four-year management cycle as outweighing the benefits of increased stability and predictability. The underlying measures were considered by for-hire operators to be more important than their duration, and any longer cycle would require clearly defined triggers for reverting to a two-year cycle.
Specialized For-Hire Approaches (Alts. 1E and 2B-3)	Greater interest emerged in tiered permitting (Alt. 2B-3) than in the proposed Letter of Authorization (LOA) program (Alt. 1E). Participants generally favored eligibility and reporting requirements that distinguish more active for-hire operators while maintaining pathways for legitimate new entrants. Some suggested testing specialized measures through a pilot or temporary approach.
Federal Permitting (Alts. 2B-1 and 2B-2)	Broad opposition to federal for-hire permit moratoria and limited-entry programs, primarily due to concerns about barriers to new entrants and future industry growth. However, participants generally expressed support for other enhanced permit requirements to validate the fleet, as well as interest in approaches that establish qualifications for specialized measures (i.e., tiered permitting) while maintaining opportunities for new entrants and legitimate fleet growth.
Federal Reporting (Alt. 2C)	Broad support for requiring a minimum level of participation in the NOAA Fisheries For-Hire Survey (e.g., 75-100% compliance) and reinstating a "Did Not Fish" for-hire reporting requirement.
State Permitting and Reporting (Alts. 3B and 3C)	General opposition to state-level limited-entry programs (Alt. 3B), alongside substantial interest in strengthening for-hire permit qualifications and improving state-level reporting (Alt. 3C). Participants encouraged further Commission-state coordination, recognizing differences in existing requirements and implementation feasibility.

Considerations for Further Amendment Development

Across the workshop's sessions, several broad considerations and needs emerged as particularly important for continued Amendment development, including:

- **Evaluate the implications of Amendment alternatives on different modes**—in particular, how more liberal for-hire mode measures could impact private angler measures. The Recreation Demand Model could be helpful, though its limitations should be recognized.
- **Better characterize for-hire permit activity and potential eligibility requirements** to qualify for specialized measures, such as activity thresholds, consideration of vessel history and state-only permit holders, and maintaining opportunities for new for-hire entrants.
- **Consider state-federal implementation challenges**—specifically, additional work is needed to determine how specialized for-hire approaches would interact with state regulations, conservation equivalency, and enforcement. Federal coordination with states, as well as coordination among states, is needed.
- **Consider phased/pilot approaches** to test performance of novel strategies such as the tiered permitting approach before implementing a more permanent system; some for-hire operators, however, emphasized the urgency of decisive action sooner to provide needed relief.
- **Maintain stakeholder engagement in the development of measures related to the Amendment,** as there were concerns about the transparency of mode-based measures development in previous instances.

Conclusions and Next Steps

The workshop identified substantial common ground among participants on several management principles, including the importance of supporting viable for-hire fisheries, improving reporting and accountability, and avoiding unnecessary barriers to entry. At the same time, participants expressed differing perspectives on the design and implementation of specific management approaches, including how their benefits and costs would be distributed among modes and strategies for mitigating risk.

The findings summarized in this report are intended to inform continued refinement and evaluation of draft Amendment alternatives by the Council, Commission, and Fishery Management Action Team/Plan Development Team (FMAT/PDT). They do not represent formal consensus positions or recommendations adopted through a workshop vote. The report provides additional detail on participant perspectives, suggested refinements, unresolved questions, and analytical needs associated with each alternative set.

1.0 INTRODUCTION

1.1 WORKSHOP BACKGROUND

Over the past several years, the Council and Commission have jointly engaged in the development of the Recreational Sector Separation Amendment[1] (Amendment) to explore whether the for-hire (charter/headboat) and private recreational fishing modes for summer flounder, scup, black sea bass, and bluefish should be managed separately. This effort arose in response to broad recognition of the differing motivations, needs, and economic considerations of the for-hire and private recreational fishing modes, respectively. As a result, a single set of management measures may not always meet the needs of both sectors. In addition, the Amendment is exploring options related to for-hire permitting and reporting requirements.[2]

Table 1. An overview of the alternatives included in the draft Recreational Sector Separation Amendment discussed at the workshop.

1. Recreational Mode Management Guidelines ➢ ***Approaches to setting different measures for different recreational modes***
2. Federal For-Hire Permitting Requirements ➢ ***Limitations on, or additional requirements for, federal for-hire permits***
3. State-Level Permitting and Reporting Requirements ➢ ***Requirements for states to implement certain minimum permitting and/or reporting requirements***

The Amendment was initiated in 2020 but was put on hold due to other priorities before work resumed in 2024, with scoping and development of draft Amendment alternatives occurring over the course of 2025. During the December 2025 joint meeting of the Council and the Commission's Interstate Fisheries Management Policy Board (Policy Board), the groups recognized that further stakeholder input was needed to inform continued refinement of alternatives.

[1] For more information on the Recreational Sector Separation Amendment, please visit the Council's and/or Commission's dedicated Amendment landing pages:
Council - https://www.mafmc.org/actions/recreational-sector-separation-amendment.
Commission - https://asmfc.org/actions/recreational-sector-separation-and-data-collection-amendment/.

[2] Information on the Amendment's draft alternatives can be found here:
http://www.mafmc.org/s/SectorSep_AltsSummary_Oct2026.pdf.

To move the Amendment discussion forward, the Council and Commission hosted the Recreational Sector Separation Stakeholder Workshop on September 23-24, 2026, at the Sheraton Baltimore Washington Airport Hotel in Linthicum Heights, Maryland. Workshop feedback, summarized below, will help the Council and Policy Board further develop options under consideration for this action.

1.2 Workshop Goal, Objectives and Intended Outcomes

The broad goal of the workshop was to bring together diverse perspectives from across the recreational fishing community to explore management approaches that account for the unique needs and priorities of different recreational fishing modes and inform continued development of the Amendment.

Workshop objectives and intended outcomes were defined to help ensure achievement of this overarching goal and position the workshop to better inform further Amendment development.

Objectives

1. Achieve an understanding of the current concerns and challenges encountered by each component of the recreational fishery
2. Gather feedback and recommendations on existing draft alternatives, including identifying priority actions and areas of consensus
3. Recommend any additional options/analyses that should be considered within the existing scope of the action

Intended Outcomes

1. A list of recommendations for the Council and Commission, including:
    a. Priority alternatives/management approaches and other areas of consensus
    b. Key considerations for further development of alternatives
    c. New ideas for alternatives not previously considered
    d. Recommendations for any analyses to support existing/newly identified draft alternatives

1.3 Workshop Approach

A five-member workshop planning team consisting of relevant staff from the Council, Commission, and NOAA Fisheries Greater Atlantic Regional Fisheries Office (GARFO) met regularly with the workshop facilitator in the months preceding the workshop to coordinate participant selection, development of the workshop agenda and other meeting materials,

and workshop logistics. Additional meetings with the Recreational Sector Separation Amendment Fishery Management Action Team/Plan Development Team (FMAT/PDT) were held as needed to provide feedback on workshop planning.

To ensure that workshop participants reflected a broad cross-section of the recreational community that targets the affected species, participants were selected via an application-based process. A total of 22 recreational fishery stakeholders participated, who represented a range of roles in the recreational community and locations along the U.S. east coast (Figure 1; Appendix I).

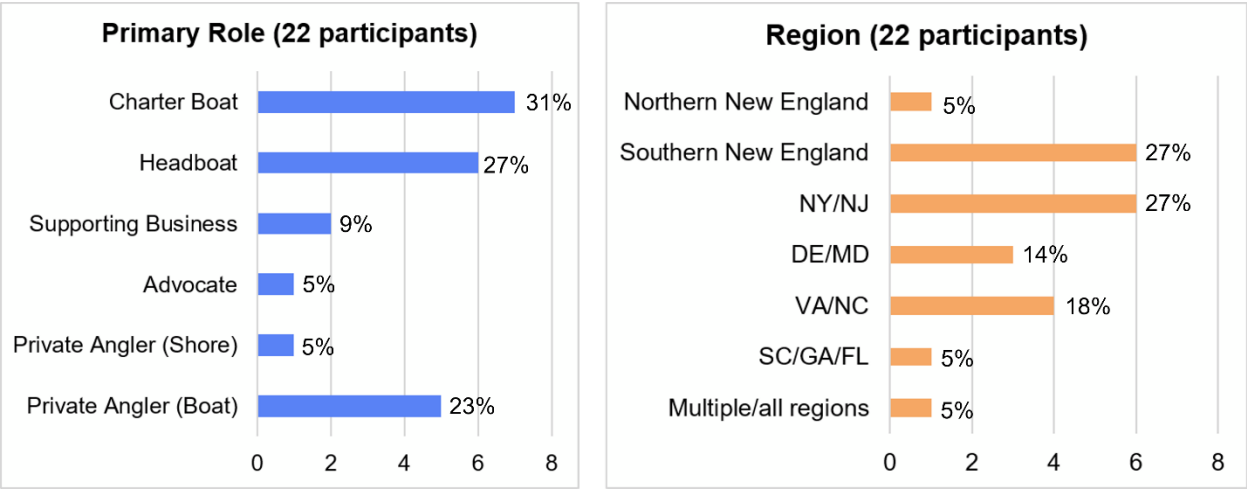


Figure 1. Workshop participants by primary role (left) and region (right). "NNE" refers to Northern New England (ME, NH, and MA north of Cape Cod); "SNE" refers to Southern New England (MA from Cape Cod south, RI, and CT).

To inform development of the workshop agenda, a short questionnaire was distributed to participants approximately one month prior to the workshop. The questionnaire asked about participants' Amendment engagement to date, familiarity with the coastwide measures setting process, initial viewpoints on draft Amendment alternatives, and priority species.

Several background materials were developed and distributed prior to the workshop to bolster participants' familiarity with the Amendment and draft alternatives and align workshop expectations. These materials were posted on the workshop landing page. [3]

[3] Links to background materials can be found on the Council's Recreational Sector Separation Workshop webpage: https://www.mafmc.org/council-events/rec-sector-separation-workshop.

Workshop Format

The workshop agenda (see Appendix II) included a mix of facilitated plenary sessions and breakout discussions (each with a facilitator and note-taker from the planning team), along with introductory presentations by Council and Commission staff on the Amendment overall and its draft alternatives. Each session included a series of prompting questions to catalyze discussion among participants. To facilitate constructive dialogue, the workshop agenda did not align exactly with the draft Amendment structure but rather grouped draft alternative sets thematically into four sessions:

- Session 1: Mode Management (Alternatives 1A, 1B, 1D, and 1F)
- Session 2: For-Hire Resiliency (Alternative 1C)
- Session 3: Specialized For-Hire Approaches (Alternatives 1E and 2B-3)
- Session 4: Federal For-Hire Permitting and State Permitting and Reporting (Alternatives 2A, 2B-1, 2B-2, 2C, and 3A-3C)

In addition, workshop participants were provided with an opportunity to suggest new alternative ideas that fell within the Amendment's scope as well as to discuss key priorities for further development—or conversely, alternatives that should not warrant further consideration.

How This Report Is Structured

This report provides a brief introduction to each workshop session, followed by a summary of key discussion points and an associated synthesis table. Discussion points are not necessarily limited to the session in which they are presented, as related topics sometimes arose during multiple sessions.

The levels of agreement presented in the synthesis tables reflect the facilitator's qualitative assessment of perspectives expressed during workshop discussions, rather than formal votes or consensus determinations. "Broad agreement" indicates a widely shared perspective with little substantive opposition expressed, while "general agreement" indicates a predominant perspective accompanied by some differing views or qualifications. "Minority view" identifies a perspective expressed by a smaller subset of participants. Not all participants expressed views on every topic. Accordingly, the report identifies general areas of common ground, differing perspectives, concerns, and suggested refinements rather than formal consensus positions.

This report is intended to serve as a reference for the FMAT/PDT, the Council, and the Commission's Policy Board. Additional information about the Amendment and draft alternatives is available in the workshop background materials.

2.0 Opening Remarks

The workshop opened with introductory remarks by Dan McKiernan, Director of the Massachusetts Division of Marine Fisheries and Chair of the Commission, and Joe Cimino, Director of the New Jersey Department of Environmental Protection's Marine Resources Administration and Chair of the Council. Chair McKiernan emphasized the importance of sustaining viable recreational fisheries and for-hire businesses for the Amendment's four species while recognizing the challenges associated with managing diverse recreational fisheries across states and regions. He noted the tradeoff between standardization of management measures and flexibility, as well as the need to consider unintended consequences. Chair Cimino encouraged participants to focus on practical solutions and lessons learned from previous management experiences, including the importance of carefully considering how mode-based recreational management approaches are designed and implemented. Both McKiernan and Cimino noted that the path taken through the Amendment may inform approaches for other species and recreational fisheries in other jurisdictions. They also stressed the value of the workshop as an opportunity for stakeholders with different perspectives to engage constructively and provide critical input on the draft Amendment.

3.0 Mode Management

Staff provided an overview of the Amendment's draft alternatives related to mode management—the development of different management measures for different components of the recreational fishery. Mode management is currently used in some capacity for each of the Amendment's four species,[4] but application of such a management tool has been inconsistent at both the state and federal levels. The draft Amendment includes alternatives related to developing uniform mode management guidelines (Alternative 1B), establishing two or three standardized regions along the coast for which to apply for-hire measures (Alternative 1D), and a one-time "reset" of measures for the for-hire fishery (Alternative 1F). In addition to feedback on these specific alternatives, workshop participants were asked to share views on which modes most

[4] An overview of how mode management is currently applied for the four species can be found here: https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/6aa2de2e61041b6fb8fe13d4/1789058606311/Guide+to+Current+Uses+of+Mode+Management.pdf.

warranted separate measures, which mode-based measures (e.g., size limits, bag limits, seasons) were most needed, and potential risks or unintended consequences that could arise with the application of mode management.

Some of the key discussion topics emerging from this session are summarized below and in Table 2. The discussion points summarized apply broadly to the draft alternatives included within the Mode Management alternative set (Alternative Set 1); discussions specific to the For-Hire Resiliency (1C) and Letter of Authorization (1E) alternatives are described in Sections 4.0 and 5.0, respectively.

Priority Modes and Measures

Participating members of the for-hire community generally agreed that **mode-based measures between the for-hire and private components of the recreational fishery were most urgently needed**. They cited years of increasingly restrictive measures, which have reduced angler satisfaction and led to challenges in booking trips as well as a reduction in the size of the for-hire fleet. Many participants mentioned that for-hire vessels provided a unique experience/opportunity to target these species that would not otherwise exist and also cited the for-hire fleet's additional reporting requirements for federally permitted vessels (and in some cases for state-permitted vessels). At the same time, several participants voiced that there should be guidance to avoid overly disparate differences in measures between the private and for-hire modes.

Some participants, including private anglers, also recognized that mode management between charter boats and headboats may be desired as well. They acknowledged that headboats may afford the only opportunity for anglers of limited means to fish on a boat and as a result may warrant more liberal measures. However, it was also noted by both charter boat and headboat operators that a key barrier to such mode management is establishing a uniform definition of a charter boat versus a headboat (e.g., discerning them as inspected versus uninspected vessels); this inconsistency could undermine enforcement efforts. **Generally, participants viewed the establishment of specific measures for charter and headboat modes as a second-order concern.**

Participants from multiple backgrounds expressed **interest in mode management for shore-based anglers**, recognizing that anglers targeting the draft Amendment's four species from shore are generally at a disadvantage regarding the numbers and/or size of fish that are available to them. There was also recognition that young anglers, subsistence fishermen, and anglers without access to a boat are often restricted to fishing from shore, and without specialized measures they might not have the opportunity to harvest fish.

Moreover, shore-based angling is often a "gateway" for anglers to eventually participate in other modes such as purchasing their own boat or sailing on charter/headboat vessels; as a result, preserving these opportunities is important. There was substantial interest in further pursuing shore-based mode management, although given that shore fishing is inherently a state waters activity and flexibility for states to develop shore-based measures already exists, views differed on whether this should occur through individual state action or within the scope of the Amendment. One private angler opposed the idea of introducing a schism within the private angler community through separate shore-mode management, and expressed that if it were to be considered at all, it should occur on a state-by-state basis.

While some participants noted reducing size limits as a priority for for-hire and shore-based modes, there was also broad recognition that the specific **measures most urgently needed were highly dependent on species and region.**

Priority Species

There was interest in developing mode-based management for scup, black sea bass, and summer flounder, with black sea bass and summer flounder measures viewed as key priorities by many attendees. **Bluefish was widely regarded as the lowest priority species for further pursuing mode management, with numerous participants recommending that it be removed from the Amendment altogether.** Participants across regions noted that bluefish measures are mostly uniform along the coast and tend to be fairly stable (unlike for the other three species), with mode-specific measures already applied in most states and in federal waters. Participants also highlighted that continued inclusion of bluefish in this action could slow progress on implementing mode-based measures for the other species. However, one participant questioned why bluefish should be removed if it already is subject to mode management and this effort is attempting to standardize mode management approaches across species.

Specific Measures of Most Interest and Regional Considerations

Workshop participants generally supported the concept of region-specific measures (Alternative 1D), recognizing the need to balance implementation feasibility with the unique characteristics of fisheries along the species' range and necessary flexibilities to accommodate those differences. At the same time, there was general concern about overly restricting regulations via less flexible regional approaches (e.g., through the establishment of only two regions). There was also recognition that the current regions established for summer flounder and black sea bass may not be suitable, but also that it is

inherently difficult to develop appropriate regions for these species**.** In some cases, the most appropriate regional borders may in fact fall *within* states (e.g., Barnegat Bay, NJ for summer flounder) as opposed to state lines to better reflect differences in species ecology, abundance, and distribution.

Mode Management Concerns

While there was broad interest in further exploring mode-specific management measures, **participants from both the for-hire and private communities expressed concern with how mode management would be developed and applied.** Specific concerns raised included the following:

- One private angler noted the perverse incentives and unintended consequences that could result from for-hire-based mode management—for example, motivating private anglers who own their own vessels to acquire a for-hire permit for the sole purpose of fishing under less restrictive measures and potentially catalyzing development of limited-entry for-hire programs (see Section 6.0).
- A for-hire captain stressed that the application of any mode-based measures would need to have associated accounting (i.e., reporting requirements) as well as accountability.
- A participant noted that in past instances (e.g., for bluefish and Atlantic mackerel[5]), the actual process for setting specific mode-based measures (i.e., development of options) has been unclear, and expressed hope that future development of mode-based options would be transparent and provide ample opportunity for stakeholder input.
- The potential consequences for private angler measures of implementing more liberal for-hire measures under mode management. One private angler noted that the catch "has to come from somewhere" and encouraged using available analytical tools, such as the Recreation Demand Model, to evaluate potential impacts on private anglers under different mode management scenarios.

[5] Atlantic mackerel are currently subject to mode-based recreational management, with the federal possession limit currently 25 fish for private boats and 50 fish for for-hire patrons. More information can be found here: https://www.fisheries.noaa.gov/species/atlantic-mackerel/recreational.

Table 2. Key discussion topics, levels of support, and unresolved questions raised during the Mode Management workshop session.

Mode Management (Alternative Set 1)		
Workshop Discussion/Recommendation	**Level of Support/Interest**	**Unresolved Questions/Needed Analysis**
Mode-based measures between the for-hire and private modes are most urgently needed.	Broad agreement among for-hire participants	Guidance needed to avoid overly disparate differences in measures between private and for-hire
Interest in mode management for shore-based anglers (especially lower size limits).	Broad agreement, one dissenter	Should this be pursued through this Amendment, through individual state action, or via another avenue?
Separate measures for charter and headboat modes is a second-order concern.	General agreement	If pursued, need to establish a uniform definition of charter boat versus a headboat (e.g., inspected vs. uninspected)
Specific measures most urgently needed depend on species and region.	Broad agreement	
Bluefish should be removed from consideration for further mode management (and from the Amendment entirely)	Broad agreement, with one dissenter	
Region-specific measures are needed but should be refined to better reflect species ecology and fishery characteristics.	General agreement	Can available data and implementation/enforcement capabilities support redefining regions to better reflect fishery differences (e.g., boundaries set within states)?
Reservations about pursuing mode-based management, including concerns about potential unintended consequences.	Minority view, including several private anglers and one for-hire captain	A need to develop associated accounting/ accountability for any modes granted different measures. Analytical need: How will more liberal for-hire measures affect private angler measures?

4.0 FOR-HIRE RESILIENCY

Staff introduced the draft For-Hire Resiliency Measures Setting Process (Alternative 1C), which would modify the current recreational measures setting process to allow for-hire measures to be set every four years as opposed to every two years (Figure 2), the latter representing the current assessment cycle for these four species. Measures could be developed based on a rolling percentage of catch/effort by mode or using another approach. The For-Hire Resiliency alternative is intended to provide additional predictability/stability for the for-hire sector, although open questions remain regarding how private mode measures should be adjusted (if needed) when for-hire measures remain stable and how accountability measures may need to be altered. In addition, the draft alternative would establish exceptions/triggers that would require for-hire measures to be adjusted earlier than four years, examples of which could include:

- A significant increase in for-hire effort and/or harvest (thresholds to be determined)
- A need for a total harvest reduction above a certain threshold
- Changes to the Recreation Demand Model that demonstrate significant changes in annual harvest

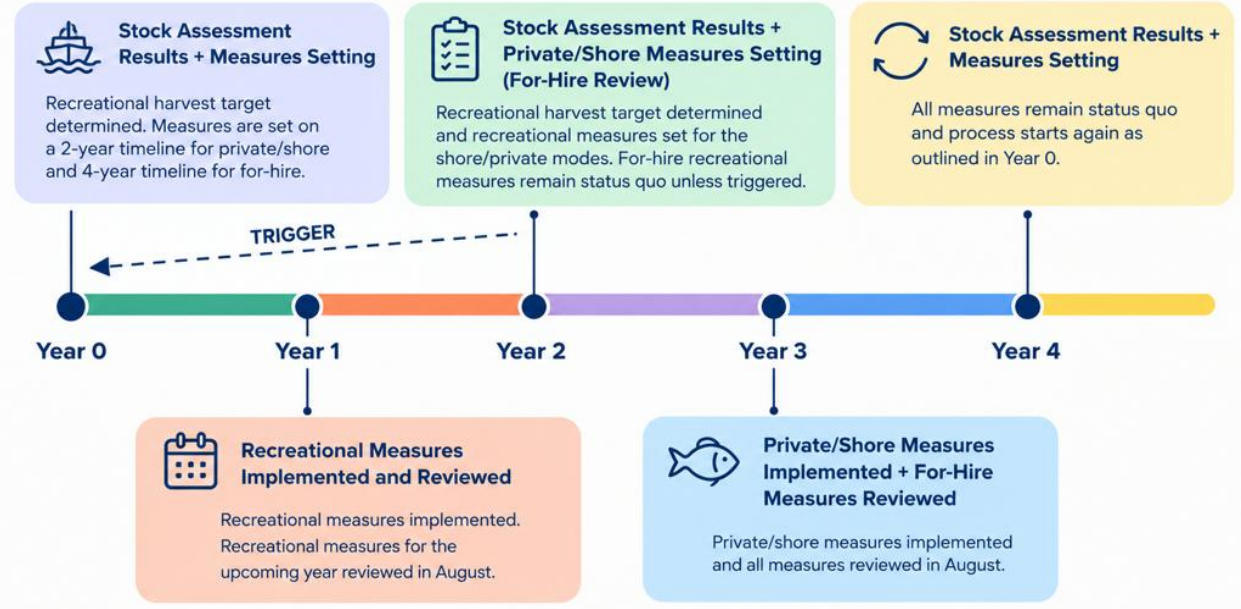


Figure 2. Illustration of the For-Hire Resiliency approach described during the workshop.

4.1 For-Hire Resiliency Breakout Sessions

Workshop participants divided into three breakout groups to discuss the For-Hire Resiliency draft alternative, including the potential benefits/drawbacks of a four-year cycle, potential triggers/thresholds to revert to a two-year cycle, and key risks and uncertainties.

While views on this alternative were mixed, with one breakout group more supportive of the For-Hire Resiliency approach than the other two, **workshop participants generally expressed that the potential risks of a four-year management cycle outweighed the perceived benefits.** The sections below and Table 3 summarize some of the key themes emerging from the breakout sessions and ensuing plenary discussion.

Management Cycle Duration Is a Second-Order Concern

For-hire participants stressed that the **duration of measures was secondary to ensuring that the measures themselves were favorable or at least acceptable to clients.** Generally, participants viewed current measures for few if any species as falling into this category; as a result, pursuit of the For-Hire Resiliency alternative alone would not be sufficient for addressing the needs of the for-hire community. Being "locked in" to restrictive measures for four years was largely viewed as worse than maintaining the existing two-year management cycle with the potential for liberalization during the following two-year cycle.

Some members of the for-hire community as well as supporting businesses (e.g., fishing tackle shops/distributors) did note that a longer management cycle would be beneficial for business planning purposes, as it facilitates marketing/booking charters and anticipating demand for tackle. While the four-year cycle would ensure greater stability, for-hire participants expressed concern about potentially forgoing any liberalization after two years, while less restrictive measures under that scenario would be available to private anglers. At the same time, some viewed the likelihood of such liberalizations as low given their perception of regulations as becoming increasingly restrictive over time. Some for-hire participants also highlighted opportunities to improve predictability within the current two-year cycle; namely, through notification of upcoming measures well in advance of the fishing year.

Key Risks

In addition to for-hire concerns about potentially forgoing liberalizations in the event of shifting to a longer management cycle, several workshop participants highlighted other key risks that the For-Hire Resiliency alternative could engender, including:

- Participants were concerned that managers may apply larger uncertainty buffers if a four-year cycle were to be applied, which could further constrain for-hire catch.
- If measures are tied to the assessment cycle, and if in the future NOAA Fisheries is not able to provide assessments for these four species every two years, the duration of for-hire measures could extend longer (e.g., if future assessments are conducted every three years, the for-hire management cycle could potentially extend to six years).

Triggers For Reverting To a Two-Year Cycle

There was a general understanding of the need for specific triggers/thresholds (e.g., for changes in for-hire effort/catch) to be established that would result in reverting the for-hire management cycle back to two years. However, participants provided limited feedback on the specific trigger examples provided during the workshop. Regarding monitoring substantial increases in catch and/or effort, one participant did express concern with the ability to effectively estimate for-hire catch and effort at the state level given that not all states require for-hire reporting (see Section 6.2). Others proposed that the For-Hire Resiliency alternative be considered in conjunction with changes to the for-hire permitting system that would separate full-time from part-time captains and thereby better control effort and catch (see Section 5.0), reducing the risk of exceeding predetermined thresholds.

Table 3. Key discussion topics, levels of support, and unresolved questions raised during the For-Hire Resiliency workshop session.

For-Hire Resiliency (Alternative 1C)		
Workshop Discussion/Recommendation	**Level of Support/Interest**	**Unresolved Questions/Needed Analysis**
The potential risks of a four-year management cycle outweigh the perceived benefits of increased stability and predictability.	General agreement	Could a longer management cycle increase uncertainty and associated management buffers? Evaluate implications of potential changes to the current two-year assessment cycle. Identify data needs/implementation considerations for combining For-Hire Resiliency with Regional Mode Management.
The duration of measures is secondary to ensuring that the measures themselves are favorable or at least acceptable to clients.	Broad agreement among for-hire operators	
If For-Hire Resiliency is pursued, clearly defined triggers for reverting to a two-year cycle would be needed.	Broad agreement	How can for-hire catch and effort be estimated at the state level given that not all states require for-hire reporting?

5.0 Specialized For-Hire Approaches

Staff described two draft Amendment alternatives that would provide specialized access (e.g., management measures or other flexibilities) for a subset of the for-hire fishery, coupled with additional requirements and qualification criteria. Development of these alternatives was spurred by the interest in separating high-activity operators (e.g., full-time captains or those earning substantial portions of their income from for-hire activity) from more casual/occasional for-hire captains. These approaches could help eliminate the perverse incentive for primarily private anglers to obtain a for-hire permit to take advantage of more liberal for-hire measures while also reducing implementation uncertainty given increased accounting requirements and a smaller universe of for-hire operators fishing under different measures.

Letter of Authorization (LOA) Program (Alternative 1E)

This alternative would establish an LOA program that would implement measures that are conservationally equivalent to federal/coastwide measures but specifically crafted to meet the needs of the for-hire fleet. Federally permitted for-hire vessels could opt in to an LOA program annually (or biennially) if the state in which they operate agrees to recognize special measures for LOA holders. LOA participating vessels could be subject to special eligibility criteria and enhanced reporting requirements. The draft approach shared with workshop participants included multiple sub-alternatives regarding program design (Table 4).

Table 4. Overview of the draft sub-alternatives for the Letter of Authorization Program for for-hire vessels (Alternative 1E).

1E-1. Species	1E-2. Length of Participation	1E-3. Eligibility	1E-4. Reporting Requirements	1E-5. Regional Configuration
1E-1-a. All four species **1E-1-b.** Species eligible for conservation equivalency (CE) (summer flounder, black sea bass) **1E-1-c.** Species not eligible for CE (scup, bluefish)	**1E-2-a.** Annual–states opt-in and participants apply for LOA program on annual basis **1E-2-b.** Length of specifications–states opt-in and participants apply only when for-hire management measures are specified	**1E-3-a**. Any federal permit-holder (if state has opted into LOA program) **1E-3-b**. Additional eligibility criteria (e.g., control date, activity level, additional reporting)	**1E-4-a**. Must complete and cooperate with surveys (e.g., requirement to participate in For-Hire Survey) **1E-4-b**. Flexible Data Gap Reporting – required collection of specific data gap elements	**1E-5-a.** Regional LOA Program with regional LOA measures specified in this action (no more than two regions) **1E-5-b**. Regional LOA measures with regions set via measures process (regions adopted at same time as measures) **1E-5-c.** Coastwide LOA measures

Tiered Permit System (Alternative 2B-3)

The tiered permitting approach is similar to the LOA Program in that it would bifurcate the for-hire fleet, but its design and implementation differ (Table 5). It would establish two for-hire tiers. One tier, as with the LOA Program, would operate under measures tailored to fit the needs of for-hire participants, and like the LOA program may have specific eligibility and reporting requirements. Tier 2, meanwhile, would include other for-hire operators who do not meet the eligibility criteria and would be subject to measures matching the private mode (or potentially developed specifically for Tier 2 permit-holders).

Unlike the LOA Program, which would allow individuals to opt in/out every one or two years, a tiered permitting approach would be a more permanent program, which would improve fishery predictability and analysis. In addition, given that the permit would be issued at the federal level, no opt-in from states would be required, although how this

system works with state measures and state permits emerged as an unresolved question (e.g., is there a way to apply this to vessels that only have a state for-hire permit; what happens if state waters measures are more restrictive, etc.).

Table 5. A preliminary comparison between the LOA (Alternative 1E) and Tiered Permitting (Alternative 2B-3) alternatives reviewed by workshop participants.

LOA	Tiered Permits	Both
• Requires state and vessel opt-in process (increased process complexity) • Non-participants would fish under "typical" for-hire regs • May be easier to establish in near term (long term admin. burden less clear) • Likely easier to modify/suspend/reverse	• More "permanent" approach (would need another action to revise) • Tier 2 regs TBD - separate regs or fish under private angler regs? • Participation more predictable - advantage for analysis • Movement between tiers and/or rolling eligibility could be high admin. burden • No state opt-in proposed - need to consider interaction with state measures	• Eligibility criteria established (should criteria be similar?) • Measures/flexibilities more tailored to for-hire needs (LOA and Tier 1) • Additional requirements under consideration (LOA and Tier 1) • Non-participants/Tier 2 have opportunity to participate in future years

5.1 Specialized For-Hire Approaches Breakout Sessions

Workshop participants again broke into three groups to review the broad concept of specialized for-hire approaches as well as the pros and cons of the LOA program and tiered permitting approaches, respectively (Table 6)**.** As in the For-Hire Resiliency discussion (see Section 4.0), some participants noted that the implementation vehicle (i.e., tiered permitting versus an LOA) was a secondary concern to the actual mode-based measures (e.g., size limit, bag limit, season) that would result. One breakout group appeared to favor the LOA approach while the other two favored the tiered permitting approach; however, in the ensuing report-out discussion, **there was generally greater interest in pursuing a tiered permitting strategy (Alternative 2B-3) as opposed to an LOA program (Alternative 1E).**

Specific advantages to the tiered permitting approach raised by participants included:

- It represents an intermediary approach for putting guardrails on for-hire permitting without necessitating a full transition to limited entry (see Section 6.1).
- Its relative permanence compared to the LOA program would facilitate business planning.

- It would require Tier 1 permit-holders to have a federal permit and thus submit VTRs, improving data collection if it prompted more participants to obtain a federal permit.

Some participants did note potential challenges associated with tiered permitting, including a) its potential perception as de facto limited entry, b) the associated requirement for current state-only permit holders to obtain a federal permit, and c) the need for states to devise a system to recognize/enforce Tier 1 measures. The need to understand how tiered permitting interacts with conservation equivalency and state-specific measures was also noted; for example, what happens if a Tier 1 permit-holder is in a state with stricter state measures? Overall, however, many participants felt that the benefits of a tiered permitting approach outweighed these concerns and noted that there may be lessons to be learned from tiered permitting approaches that have been applied to commercial fisheries. One participant suggested that piloting such a tiered approach through an LOA or Exempted Fishing Permit (EFP) may be a prudent first step prior to full-scale development and implementation.

Some participants did appreciate the proposed LOA approach's flexibility given the one- or two-year opt-in structure and also recognized that it may be easier/faster to modify if needed should challenges arise. However, they also noted key challenges. For instance, the LOA approach would restrict management measures to two regions and thus would not account for the coastwide variability and need for flexibility discussed during the Mode Management discussion (see Section 3.0). A for-hire operator noted that implementing an LOA could also complicate MRIP estimates. Participants also cited potential issues that could result from the need for states to opt into the LOA program, including a) putting for-hire operators in states that do not opt in at a disadvantage and b) presenting enforcement challenges for states given the need for states to enforce multiple sets of measures.[6] To mitigate implementation uncertainty related to the LOA approach, one strategy could be to require states that opt into the LOA program to *not* have state-specific mode splits (private/for-hire) for those species.

Regardless of an LOA or tiered permitting approach, participants generally emphasized the importance of **establishing appropriate eligibility criteria for LOA holders or Tier 1 permit holders to ensure that these programs were only available to more active for-hire vessels**. Examples of such eligibility criteria discussed included: 1) a minimum of 50 for-hire trips (per Vessel Trip Reports [VTRs]) each year, regardless of target/harvest

[6] Some of these challenges may also be relevant to the tiered permitting alternative pending future discussions on the mechanics of that approach.

species; 2) vessel/business insurance; and 3) passage of U.S. Coast Guard vessel safety inspections and drug tests. Provisions to account for changing vessel history for a single individual should also be explored, as well as strategies for assessing past effort for state-only permitted vessels primarily fishing in state waters (i.e., not submitting federal VTRs) whose state does not require reporting. Participants also noted that **neither approach should restrict legitimately interested new participants intending to pursue full-time for-hire work**. For such individuals, a secondary qualification criterion such as proof of income as a for-hire deckhand could be appropriate.

Table 6. Key discussion topics, levels of support, and unresolved questions raised during the Specialized For-Hire Approaches workshop session.

Specialized For-Hire Approaches (Alternatives 1E and 2B-3)		
Workshop Discussion/Recommendation	**Level of Support/Interest**	**Unresolved Questions/Needed Analyses**
The tiered permitting strategy (Alternative 2B-3) is a preferable specialized for-hire approach compared to the LOA Program (Alternative 1E).	General agreement	States need to devise a system to recognize/enforce Tier 1 measures and develop Tier 2 measures. How will tiered permitting interact with conservation equivalency and state-specific measures? Are available data/analytical tools sufficient to evaluate potential impacts?
Either specialized approach should include eligibility criteria that ensure that such approaches are only available to more active for-hire vessels (see text for specifics).	Broad agreement	Specific eligibility criteria need to be refined, including accounting for changing vessel history for a single individual. Strategies are needed for assessing past effort for state-only permitted vessels fishing primarily in state waters whose state does not require reporting.
Neither specialized approach should restrict legitimately interested new participants.	Broad agreement	There is a need to develop secondary qualification criteria for these individuals.

6.0 Federal For-Hire Permitting and State Permitting and Reporting

The draft Amendment included several alternatives intended to increase the effectiveness of any mode management approaches by limiting the ability of permitted for-hire vessels to freely move in between modes to take advantage of specific measures. In addition, draft for-hire reporting requirements at the state and/or federal levels were proposed to improve data collection from this sector. A summary of alternatives, along with key discussion points by workshop participants, are described below and in Table 8.

6.1 Federal For-Hire Permitting

Staff described draft federal for-hire permitting alternatives to limit and/or prohibit new entrants, which could be considered in conjunction with or independently of mode management alternatives (Section 3.0). Alternative approaches to the current open-access for-hire system included: 1) a moratorium on new for-hire permits (Alternative 2B-1) with or without a sunset provision; or 2) for-hire capacity limitations (Alternative 2B-2), which would establish qualification criteria (e.g., effort, landings thresholds) to reduce latent effort in the fishery (Table 7) and thus mitigate implementation uncertainty while providing potential pathways for new entrants.[7]

Workshop participants broadly understood the rationale for these alternatives and the need to mitigate perverse incentives while ensuring that any mode-based management approaches were applied to those who most needed them for business purposes. However, **participants generally expressed opposition to implementing a federal for-hire permit moratorium (2B-1) or a limited entry system (2B-2)**. Participants noted that the decline of full-time participants has been a defining issue and that while limited entry could reduce the risk of individuals' ability to "game the system," it was outweighed by the perceived barriers to new industry entrants (and future for-hire industry growth). Participants also cited the unintended consequences that could result from limited entry, including permit consolidation. The specialized for-hire approaches discussed in Section 5.0 (with eligibility criteria to identify potential LOA holders or Tier 1 permit holders) were viewed as a better strategy for addressing permitting challenges than a moratorium or limited-entry program. Participants favored these approaches as they would establish a pool of more full-time operators while maintaining an open-access option with the potential to move between categories based on activity.

[7] Discussion on a third approach to reform federal for-hire permitting, the development of a tiered permitting strategy (Alternative 2B-3), can be found in Section 5.0.

Table 7. The number of for-hire permits that would qualify based on the Amendment's federal for-hire permitting sub-alternatives (2B-2). The maximum number of permits issued in any given year between 2015 and 2024 is provided for reference, as well as the actual total number of unique permits issued prior to 2/11/2025.

Qualification Criteria Sub-Options	Summer Flounder	Scup	Black Sea Bass	Bluefish
2B-2-a: For-hire vessels that have submitted at least one for-hire VTR in the last 5 years (2021-2025)	563	501	567	583
2B-2-b: For-hire vessels that have submitted at least 1 for-hire VTR in at least 3 out of the last 10 years (2016-2025).	601	532	598	626
2B-2-c: For-hire vessels that have reported landings of the relevant species at least once in the last 10 years (2015-2024).	847	769	852	877
2B-2-d: For-hire vessels that have reported landings of the relevant species in at least 3 out of the last 10 years (2016-2025).	479	431	474	481
Max. number of permits issued in any one year from 2015-2024	964	967	831	954
Number of total unique vessel permits issued at any time prior to 2/11/2025	4,053	2,791	3,158	3,195

Federal For-Hire Reporting

In addition, this alternative set included establishing a minimum threshold of participation in the NOAA Fisheries For-Hire Telephone Survey to enhance data collection (Alternative 2C). For-hire and private workshop participants alike agreed that **requiring participation in the For-Hire Survey would be beneficial for data collection and should be explored further**. One participant noted that submitted data could potentially be used to validate electronic Vessel Trip Report data. Recommended required compliance with the For-Hire Survey varied but ranged from 75-100%.

The group also discussed not only developing requirements for the For-Hire Survey but also enhancing requirements for VTRs. **Namely, for-hire workshop participants strongly**

supported reinstating a "Did Not Fish" (DNF) report requirement in order to get a better sense of vessel activity levels and latent effort, including assessing whether there are some permitted vessels that are fishing but not complying with reporting requirements.

6.2 State For-Hire Permitting and Reporting

Staff described that state-level for-hire permitting and reporting requirements are highly variable among states. The draft Amendment includes alternatives designed to standardize such requirements, including requiring implementation of state-level for-hire limited entry programs (Alternative 3B) and required state-level for-hire reporting (Alternative 3C). The goals of these alternatives are to increase the effectiveness of any mode management approaches, improve consistency among states, and enhance the ability to analyze the performance of mode-based management measures. At the same time, there may be barriers to implementing such requirements (e.g., legislation) in some states.

As with the federal for-hire permit discussion (Section 6.1), **there were broad concerns about instituting limited entry programs at the state level**, although some private anglers did view it as potentially valuable from a client safety perspective (e.g., risks associated with a for-hire operator who does not possess required safety gear or appropriate insurance). At the same time, there was interest in ensuring that for-hire permits were only issued to legitimate and active for-hire operators as opposed to those simply seeking to take advantage of favorable mode-based measures. Criteria could include some minimum activity threshold and other evidence of good standing (liability insurance, drug tests, etc.[8]), similar to what was discussed for Specialized For-Hire Approaches (Section 5.0). Rhode Island's for-hire permitting program in particular was cited as having appropriate criteria for issuing for-hire permits that could be used as a model elsewhere. That being said, there was some tension between opposition to limited entry based on past activity or other criteria and support for using activity/criteria to restrict permit issuance to legitimate for-hire operators (or legitimate new entrants) moving forward. **There was interest in the Commission's further exploring strategies to strengthen and standardize state-based for-hire requirements—in particular, determining what is possible/feasible for states to achieve.**

Workshop participants generally viewed **state-level reporting requirements (currently only in place in a handful of states) as important for catch monitoring and**

[8] While individual states can include these as criteria for issuing for-hire permits, they cannot be used as criteria at the federal level.

understanding the outcomes of mode-based management, particularly in states or regions where for-hire operators holding only state-level permits account for substantial catches of the relevant species.

Table 8. Key discussion topics, levels of support, and unresolved questions raised during the Federal For-Hire Permitting and State For-Hire Permitting and Reporting workshop session.

Federal For-Hire Permitting and State For-Hire Permitting and Reporting (Alternatives 2A, 2B-1, 2B-2, 2C, and 3)		
Workshop Discussion/Recommendation	**Level of Support/Interest**	**Unresolved Questions/Needed Analysis**
Opposition to implementing a federal for-hire permit moratorium (2B-1) or limited entry system (2B-2)	Broad agreement	Eligibility criteria sub-options could be refined for potential application to other alternatives that maintain new entrant access (e.g., tiered permits); suggest a higher activity threshold for these options (e.g., submission of 30, 40 or 50 eVTRs for any species in a year).
Required participation in the For-Hire Survey (2C)	Broad agreement	What is an acceptable compliance rate? 75%? 100%?
Reinstate a "Did Not Fish" (DNF) for-hire report requirement	Broad agreement	Revisit status of recent Northeast Region Coordinating Council (NRCC) discussions of reinstating these requirements.
Opposition to implementing uniform, mandatory state-level for-hire limited entry programs (3B)	General agreement; some private anglers suggested that limited entry could be helpful from a client safety perspective	
The Commission should further explore strategies to strengthen/standardize requirements for for-hire permits (i.e., enhance permit requirements without requiring development of limited entry programs).	Broad agreement	Rhode Island's program may be a useful model. Is a need to determine what is possible/feasible for states to achieve.
State-level for-hire reporting requirements should be further pursued	Broad agreement	Feasibility needs to be explored among states.

7.0 Workshop Synthesis and Priorities

Workshop discussions highlighted substantial interest in exploring changes to recreational management approaches to better support the ongoing viability of the for-hire fishery. At the same time, there is no one-size-fits-all solution to this challenge, as substantial regional variability in fishery characteristics and for-hire needs must be taken into account. As a result, state-federal coordination is critical to develop and implement appropriate strategies, as is leveraging lessons learned from past efforts (e.g., on mode splits, permitting and reporting).

Table 9 synthesizes some of the key messages on draft alternatives emerging from workshop discussions, including views on existing alternatives, ideas for new alternatives/approaches, and open questions/data needs. Please note that the below table does not represent consensus views of participants; for additional details please visit the relevant report section.

There were differing perspectives regarding the pace at which the Amendment should move forward, in particular with regard to the implementation of mode management approaches, For-Hire Resiliency, and Specialized For-Hire approaches. Some cautioned against the wholesale application of these approaches in the near term, with suggestions including piloting an approach for one species and/or delaying implementation until recalibrated Marine Recreational Information Program catch and effort estimates are available. Others emphasized that these challenges and potential approaches had been discussed for years, and it was urgent that such strategies be implemented quickly to provide relief to the for-hire industry.

Table 9. Synthesis of workshop perspectives and areas of agreement. For views on unresolved questions and/or needed analyses, please see the relevant report section.

Key Workshop Discussion Topics and Recommendations		
Alt. Set	**Workshop Discussion/Recommendation**	**Level of Support/Interest**
Overarching Comments	*There is an urgent need for action to provide relief to the struggling for-hire fleet.*	Broad agreement among for-hire participants
	Remove bluefish from further consideration in the Amendment.	Broad agreement, with one opposing view
Mode Management: Overall	*Mode-based measures between the for-hire and private modes are most urgently needed.*	Broad agreement among for-hire participants
	Interest in mode management for shore-based anglers (especially lower size limits).	Broad agreement, one dissenter
	Separate measures for charter and headboat modes is a second-order concern.	General agreement
	Specific measures most urgently needed depend on species and region.	Broad agreement
	Region-specific measures are needed but should be refined to better reflect species ecology and fishery characteristics.	General agreement
	Reservations about pursuing mode-based management, including concerns about potential unintended consequences.	Minority view, including several private anglers and one for-hire captain
For-Hire Resiliency (Alt. 1C)	*The potential risks of a four-year management cycle outweigh the perceived benefits of increased stability and predictability.*	General agreement
	The duration of measures is secondary to ensuring that the measures themselves are favorable or at least acceptable to clients.	Broad agreement among for-hire participants
	If For-Hire Resiliency is pursued, clearly defined triggers for reverting to a two-year cycle would be needed.	Broad agreement
Specialized For-Hire Approaches (Alts. 1E and 2B-3)	*The tiered permitting strategy (Alternative 2B-3) is a preferable specialized for-hire approach compared to the LOA Program (Alternative 1E).*	General agreement
	Either approach should include eligibility criteria that ensure that such approaches are only available to more active for-hire vessels.	Broad agreement
	Neither specialized approach should restrict legitimately interested new participants.	Broad agreement
Federal For-Hire Permitting and State For-Hire Permitting and Reporting (Alts. 2A, 2B-1, 2B-2, 2C, and 3)	*Opposition to implementing a federal for-hire permit moratorium (2B-1) or limited entry system (2B-2)*	Broad agreement
	Required participation in the For-Hire Survey (2C)	Broad agreement
	Reinstate a "Did Not Fish" (DNF) for-hire report requirement	Broad agreement
	Opposition to implementing state-level for-hire limited entry programs (3B)	General agreement; some private anglers suggested that limited entry could be helpful from a client safety perspective
	The Commission should further explore strategies to strengthen/standardize requirements for for-hire permits.	Broad agreement
	State-level for-hire reporting requirements should be further pursued.	Broad agreement

8.0 Next Steps

Outcomes from the Recreational Sector Separation Stakeholder Workshop will be discussed at the November 2026 joint meeting of the Council and Commission's Policy Board, which will direct the FMAT/PDT to further refine draft Amendment alternatives. The Council/Policy Board then plans to approve a draft range of alternatives in January 2027, which will be used as the basis for a Public Hearing Document to circulate in Spring 2027. The Council and Commission anticipate taking final action on this Amendment in August 2027. Full details of the anticipated timeline can be found in Figure 3.

One for-hire participant asked whether it would be possible to organize a follow-up meeting with the same group of workshop participants to provide additional guidance on draft alternatives as they are further developed. GARFO and Council staff noted that while such a meeting could be possible (likely via webinar), it would need to be discussed with Council and Commission leadership and the decision to do so would have to be made by Council and Policy Board members, as it would likely delay the Amendment timeline. They also noted that many workshop attendees sit on relevant Advisory Panels which are scheduled to meet in summer 2027 to provide further input on alternatives.

September 2026	Stakeholder workshop to further develop draft alternatives
November 12, 2026	Council/Policy Board meet to review workshop report and direct FMAT/PDT to refine alternatives (Commission's Annual Meeting) https://asmfc.org/events/2026-annual-meeting/
January 2027	Council/Policy Board approve range of alternatives for public hearings
Winter 2027	FMAT/PDT develops draft public hearing document/draft amendment
Spring 2027	Council/Policy Board approve public hearing document/draft amendment for public comment
Spring/Summer 2027	Public hearings and comment period
Summer 2027	AP meeting; FMAT/PDT meetings to provide recommendations on final action
August 2027	**Final action**
Fall 2027	Staff develop and submit required documentation to NOAA Fisheries
TBD	Effective date of management changes (*implementation timeline depends on final alternatives adopted*)

Figure 3. Tentative timeline for the Recreational Sector Separation Amendment.

9.0 Conclusion

The Recreational Sector Separation Stakeholder Workshop provided an opportunity for diverse recreational fishing interests to engage in constructive dialogue regarding the potential benefits, challenges, and implementation considerations associated with the draft Amendment alternatives. Although participants expressed differing perspectives on

specific alternatives, recurring themes included the importance of maintaining viable for-hire fisheries, considering the needs and interests of private anglers, improving accountability and reporting, and avoiding unintended barriers to for-hire participation.

The workshop generated a range of suggestions for refining existing alternatives, exploring additional approaches, and conducting analyses to better understand the potential implications of the draft Amendment alternatives. These findings provide a foundation for continued consideration of the Amendment by the Council, Commission, and FMAT/PDT. As the Amendment moves forward, continued stakeholder engagement and evaluation of the tradeoffs associated with different management approaches will be important for developing alternatives that appropriately balance the needs of all recreational fishing modes while meeting conservation and management objectives.

APPENDIX I. WORKSHOP ATTENDEES

Workshop Participants

Workshop participants were selected via application. A Google Form application was developed by the Workshop Planning Team that included questions regarding applicant primary role/affiliation, region, species of interest, fishing experience, management familiarity/engagement, and rationale for workshop interest. The application was distributed via the Council's and Commission's communications outlets in June 2026. A total of 59 applications were received, which were reviewed by the FMAT/PDT in July before forwarding recommended participants to the Council and Policy Board members for final approval. The 22 selected applicants were notified via email on July 28, 2026.

Name	Primary Role	Affiliation (if applicable)
Capt. Rick Bellavance	Charter Boat	F/V Priority Too
Marc Berger	Charter Boat	Lucky Strike Charters
Raymond Jarvis	Charter Boat	Salt of the Earth Sportfishing
Jill Maganza-Ruiz	Charter Boat	November Rain Charters
Christopher Mozitis	Charter Boat	Wee Cat Charters
Michael Pierdinock	Charter Boat	Stellwagen Bank Charter Boat Assoc.
Walter Richard Wasdin Jr	Charter Boat	Reel Blessed Sportfishing
William Howard Bogan Jr	Headboat	Vessel "Jamaica"
Victor M. Bunting	Headboat	Ocean Princess Inc.
Mark DeJong	Headboat	Celtic Quest Fleet
Harry D. Parsons II	Headboat	Fisherman's Wharf
Michael Pirri	Headboat	Flying Connie Charters
Kyle White	Headboat	Rudee Tours
Nick Cicero	Supporting Business	Folsom Corporation
Greg Cudnik	Supporting Business	Fisherman's Headquarters
Michael Waine	Advocate	American Sportfishing Association
Peter R. Belasco	Private Angler (Shore)	
Allan C. Butler	Private Angler (Boat)	
Paul Gerard Caruso	Private Angler (Boat)	
Robert J. Lorenz	Private Angler (Boat)	
Lenny Rudow	Private Angler (Boat)	FishTalk Magazine
Austin Thurlow	Private Angler (Boat)	

Workshop Planning Team

Kiley Dancy	Mid-Atlantic Fishery Management Council (MAFMC)
Hannah Hart	MAFMC
Tracey Bauer	Atlantic States Marine Fisheries Commission (ASMFC)
Chelsea Tuohy	ASMFC
Savannah Lewis	NOAA Fisheries Greater Atlantic Regional Fisheries Office (GARFO)
Willy Goldsmith	Pelagic Strategies (Facilitator)

Other In-Person Attendees

Matt Ayer	Massachusetts Division of Marine Fisheries (MA DMF) (Sector Separation Amendment FMAT/PDT Member)
Joe Cimino	New Jersey Department of Environmental Protection (MAFMC Chair)
Travis Ford	GARFO
Martin Gary	New York State Department of Environmental Conservation (NY DEC)
Dan McKiernan	MA DMF (ASMFC Chair)
Paul Risi	MAFMC Member
Rachel Sysak	NY DEC (Sector Separation Amendment FMAT/PDT Member)
Geoff White	Atlantic Coastal Cooperative Statistics Program

Webinar Attendees

Julia Beaty	Jessica Daher	Jesse Hornstein	John Maniscalco
Anna Beckwith	Cynthia F	Greg Hueth	Nichola Meserve
Joseph Beneventine	Corrin Flora	Raymond Kane	Jose Montanez
Hayden Berry	Tony Friedrich	Carrie Kennedy	Muffley, Brandon
Sue Bertoline	Jim Gilmore	Toni Kerns	Adam Nowalsky
Kurt Blanchard	Melanie Griffin	John Lake	Matt Rigdon
Jeff Brust	Jake Hardy	Michael Luisi	Jason Seman
Mario Campo	Brendan Harrison	Bradlie M	Jenny Smith
			Kelly Whitmore

APPENDIX II. WORKSHOP AGENDA

Recreational Sector Separation Stakeholder Workshop
September 23-24, 2026

Sheraton Baltimore Washington Airport Hotel
1100 Old Elkridge Landing Road
Linthicum Heights, MD, 21090

Listen-Only Webinar:

- Click here to join the webinar. (If prompted, enter Meeting Number: 2334 139 8905; Password: sectorseparation). After you connect, you will have the option to choose whether to use your phone or computer microphone and speakers for audio.
- For phone only access: 1-415-655-0001; Access code: 2334 139 8905.

Note: This webinar will be broadcast in listen-only mode and will not include breakout discussions.

AGENDA
(Times are Eastern Time and approximate)

DAY 1: Wednesday, September 23		
Time	**Title**	**Presenter**
9:30 – 10:00	**Arrival and Coffee**	
10:00 – 10:10	**Welcome and Opening Remarks**	Joe Cimino, MAFMC Chair Dan McKiernan, ASMFC Chair
10:10 – 10:20	**Workshop Overview**	Willy Goldsmith, Pelagic Strategies
10:20 – 10:45	**Attendee Introductions**	
10:45 – 11:15	**Overview: Recreational Sector Separation Amendment**	Kiley Dancy, MAFMC staff
11:15 – 11:25: BREAK		
11:25 – 12:15	**Session 1: Mode Management**	Chelsea Tuohy, ASMFC staff
12:15 – 1:15: LUNCH		

1:15 – 1:40	**Session 2: For-Hire Resiliency**	Chelsea Tuohy, ASMFC staff Savannah Lewis, NOAA Fisheries staff
1:40 – 2:30	**Breakout Session: For-Hire Resiliency**	
2:30 – 2:45: BREAK		
2:45 – 3:10	**Breakout Session Report-Out and Discussion**	
3:10 – 3:35	**Session 3: Specialized For-Hire Approaches**	Hannah Hart, MAFMC staff Kiley Dancy, MAFMC staff
3:35 – 4:25	**Breakout Session: Specialized For-Hire Approaches**	
4:25 – 4:50	**Breakout Session Report-Out and Discussion**	
4:50 – 5:00	**Wrap Up and Preview of Day 2**	Willy Goldsmith, Pelagic Strategies
DAY 2: Thursday, September 24		
8:30 – 8:45	**Day 2 Welcome, Recap, and Agenda**	Willy Goldsmith, Pelagic Strategies
8:45 – 10:00	**Session 4: Federal For-Hire Permitting and State Permitting and Reporting**	Tracey Bauer, ASMFC staff
10:00 – 10:15: BREAK		
10:15 – 11:00	**New Ideas Session: What Is Missing?**	
11:00 – 11:45	**Workshop Synthesis and Priorities for Further Development**	
11:45 – 12:00	**Discussion of Next Steps**	MAFMC/ASMFC staff
12:00: ADJOURN		

APPENDIX III. ABBREVIATIONS USED IN THIS DOCUMENT

Recreational Sector Separation Stakeholder Workshop

September 23-24, 2026 | Baltimore, MD

List of Acronyms/Key Terms*

ACL	Annual Catch Limit: The level of catch (harvest plus dead discards) for a stock for each sector (commercial and recreational) intended to ensure that overfishing does not occur.
ASMFC (or Commission)	Atlantic States Marine Fisheries Commission: Coordinates state management of bluefish, scup, summer flounder, and black sea bass in state waters.
CE	Conservation Equivalency: A process specific to summer flounder and black sea bass that allows for setting state- or region-specific recreational measures instead of coastwide measures. Under conservation equivalency, federal waters measures are waived and anglers are subject to the measures of the state to which they return.
EFP	Exempted Fishing Permit: A temporary specialized federal permit issued by NOAA Fisheries that authorizes vessels to conduct fishing activities otherwise prohibited by regulations; primarily for scientific research, data collection, and innovative technology testing.
FMAT/PDT	Fishery Management Action Team/Plan Development Team: Technical team responsible for developing and refining draft Amendment alternatives and analysis, based on direction from the Council and Policy Board.
FMP	Fishery Management Plan
GARFO	NOAA Fisheries Greater Atlantic Regional Fisheries Office: Approves and implements federal management measures.
Limited Access	A management approach that restricts the number of participants in a fishery (for example, for-hire permits).
LOA	Letter of Authorization: Document issued by NOAA Fisheries that grants a vessel the ability to conduct activities that would otherwise be prohibited. LOA programs are incorporated into the Federal regulations and remain in place until modified via subsequent action.
MAFMC (or Council)	Mid-Atlantic Fishery Management Council: Manages bluefish, scup, summer flounder, and black sea bass in federal waters.

Measures	Recreational bag, size, and season limits
Mode Management	Establishing separate measures such as size limits, bags limits, and/or seasons for different components of the recreational fishery (such as different measures for private anglers versus for-hire vessels) while continuing to manage the recreational fishery under a single shared Recreational Harvest Limit.
Policy Board	ASMFC Interstate Fisheries Management Program Policy Board
RDM	Recreation Demand Model: A statistical model developed for summer flounder, black sea bass, and scup that combines information about angler behavior/preferences and fish population estimates to predict the effect of alternative management strategies on coastwide recreational harvest, releases, angler welfare, and fishing effort. Results are used to determine the amount of change in harvest needed, and set recreational bag and size limits and seasons expected to achieve the change required.
RHL	Recreational Harvest Limit: The total amount of fish that can be harvested annually by the recreational sector across all modes.
RMS	Recreational Measures Setting Process: The approach for setting recreational management measures for bluefish, scup, summer flounder, and black sea bass finalized through the 2025 Recreational Measures Setting Process Framework.
VTR	Vessel Trip Report. Federally permitted for-hire vessels must submit electronic VTRs within 48 hours of trip completion. State level requirements vary.

*Some of these definitions are specific to their use in the context of the Recreational Sector Separation Amendment.

From:	Craig and Verni
To:	Tina Berger
Subject:	[New] [External] FW: Sector separation amendment - comment filed with ASMFC, documents attached
Date:	Friday, October 16, 2026 5:41:59 PM
Attachments:	FINDINGS MEMORANDUM.pdf BSB-SSA-2026-01_Sector_Separation_Comment.pdf

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From: Craig and Verni <craiga60@comcast.net>
Sent: Wednesday, October 14, 2026 4:16 PM
To: 'Dancy, Kiley' <kdancy@mafmc.org>; 'Hart, Hannah' <hhart@mafmc.org>
Cc: 'Beaty, Julia M.' <jbeaty@mafmc.org>
Subject: Sector separation amendment — comment filed with ASMFC, documents attached

Kiley, Hannah,

Julia copied you as the staff leads on the Recreational Sector Separation and Data Collection Amendment. I am filing a public comment on it through the ASMFC form for the 19 October briefing-materials deadline, and sending you the documents directly because the form takes no attachment and the comment relies on five tables.

The comment makes one arithmetic point and takes no position on whether the modes should be managed separately. Sector separation is a disaggregation of catch accounting; disaggregation reduces the number of fish behind each estimate; and across 315 New Jersey annual MRIP estimates covering four species and three modes, the precision of an estimate tracks its size rather than the mode it came from. Estimates below 100,000 fish fail the Program's own standard half the time, estimates above two million never do, and cutting a single annual series into its waves — same fish, same anglers, same years, only the cell size changed — roughly doubles the percent standard error. Neither mode is reliably better measured than the other; scup fails in both before this amendment disaggregates anything further.

What it asks for is a minimum-precision precondition: that the amendment state, for each mode-level action it contemplates, what estimate precision is required to support that action and at what level of aggregation precision will

be assessed.

Two attachments:

— BSB-SSA-2026-01, the comment, Issue 1, seven pages.
— Findings memorandum, Issue 2, five pages, carrying the vessel trip report analysis behind Table 5 with its qualifications.

The eighteen MRIP queries behind every figure are organized and I will send them to anyone who wants to check the arithmetic.

Nothing here needs a reply. I am a private recreational fisherman writing in an individual capacity, and these documents are my own work, reviewed or endorsed by nobody. If anything in them is wrong I would rather be told than have it stand.

Craig A. McIlrath
Marlton, New Jersey
856-905-1711
Craiga60@comcast.net

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

BSB-SSA-2026-01

Estimate Precision as a Function of Cell Size: Comment on the Recreational Sector Separation and Data Collection Amendment

Submitted to	**Mid-Atlantic Fishery Management Council and Atlantic States Marine Fisheries Commission — Recreational Sector Separation and Data Collection Amendment (summer flounder, scup, black sea bass and bluefish)**
Copy to	New Jersey Division of Fish and Wildlife, Bureau of Marine Fisheries
From	Craig A. McIlrath, Marlton, New Jersey — private recreational fisherman, submitting in an individual capacity
Scope	Catch-accounting precision only. This comment takes no position on whether for-hire and private modes should be managed separately.
Date	Issue 1, 19 October 2026
Contact	blandmail@comcast.net

1. What this comment does and does not say

This comment does not oppose managing for-hire recreational fisheries separately from other recreational modes, and it takes no position on the merits of separation. It does not assert any mode is measured worse than another, and Section 3 reports evidence no mode is.

It makes one arithmetic point. Sector separation is a disaggregation of catch accounting. Disaggregation reduces the number of fish behind each estimate, and in these data the precision of an estimate is governed by that number. Where an amendment attaches an accountability measure, an in-season closure, or a mode-specific regulation to a cell too small to support it, the outcome is decided by sampling noise rather than by the fishery. What Section 7 requests is a minimum-precision precondition, not a veto.

Source for every figure below: MRIP Query Tool, catch and effort time series, calendar years 1998 through 2025, retrieved September and October 2026, current calibrated vintage. Eighteen queries were run, covering four species, three fishing modes, harvest and released-alive catch, annual and by-wave summaries, and a state-by-state breakout. The Program publishes with each estimate a percent standard error and its own verdict on whether the estimate meets the MRIP standard, recorded as yes, caution, or no. The verdict counts below are the Program's, not this commenter's.

2. Precision is governed by the size of the estimate, not by the mode

Twelve New Jersey annual series were examined, covering four species, three fishing modes and both harvest and released-alive catch. Across the 315 annual estimates in those series the percent standard error falls as the number of fish behind the estimate rises. An ordinary least squares fit against the base-ten logarithm of the estimate gives a

slope of 16.1 percentage points of error removed per tenfold increase in fish, a correlation of −0.676 and an R-squared of 0.457.

Two of those figures need plain language. A correlation runs between −1 and +1. The value of −0.676 says the two quantities move in opposite directions — as the number of fish behind an estimate rises, the percent standard error falls — and says the relationship is a consistent one rather than a loose tendency; −1 would mean it held without a single exception and 0 would mean no relationship at all. The R-squared of 0.457 says how much of the variation in precision is accounted for by cell size by itself: about 46 percent. The other 54 percent is everything else — which species, which mode, which year, and chance. Cell size is therefore the largest single influence on whether an estimate meets the Program's standard, and it is not the only one. Tables 2 and 4 both show cases which run against the general pattern, and they are pointed out where they occur.

Table 1. Percent standard error by size of estimate, New Jersey annual MRIP estimates, 1998 to 2025, pooled across twelve series (four species; private, for-hire and shore modes; harvest and released-alive catch). Estimate size in numbers of fish; percent standard error in percent; failing share as a percentage of the estimates in that band.

Size of estimate (fish)	Estimates (count)	Median PSE (%)	Failing MRIP standard (%)
Under 100,000	66	50.3	50.0
100,000 to 500,000	91	29.1	13.2
500,000 to 2,000,000	108	22.9	2.8
Over 2,000,000	50	13.4	0.0

The relationship is monotone across all four bands. Below 100,000 fish, half the estimates fail the Program's own standard. Above two million, none do.

One qualification is owed and is stated here rather than left to be found. Percent standard error is a relative measure, so part of this relationship is arithmetic rather than a finding about survey design. Section 4 therefore reports the same effect in a form which does not depend on it, by holding species and mode fixed and changing only the level of aggregation.

3. Neither mode is consistently better measured

It would be convenient for a private recreational fisherman to argue the private mode is measured worse and should therefore be shielded. The data do not support that argument and this comment does not make it. Across the four species in the amendment, on annual released-alive estimates, neither mode is reliably the better measured.

Table 2. Released-alive (Type B2) annual estimate precision by species and mode, New Jersey, 1998 to 2025 (percent standard error in percent; verdict shares as a percentage of the annual estimates in that series). Source: MRIP Query Tool.

Species	Mode	Median PSE (%)	Meets standard (%)	Fails standard (%)
Black sea bass	Private and rental	20.0	92.9	0.0
Black sea bass	All for-hire	18.9	85.7	0.0
Summer flounder	Private and rental	11.8	100.0	0.0
Summer flounder	All for-hire	17.4	85.7	0.0
Scup	Private and rental	52.5	0.0	51.9
Scup	All for-hire	49.8	14.3	46.4
Bluefish	Private and rental	22.0	92.9	0.0
Bluefish	All for-hire	39.2	28.6	32.1

Three results in that table bear on how this amendment should be framed. For black sea bass the two modes are equivalent, at 20.0 against 18.9 percent median error, and neither mode fails the standard in any year of the series. Table 4 below covers 2016 through 2025 for the same species and shows the same thing a second way: across that decade no New Jersey estimate in either mode fails. For bluefish the asymmetry runs toward the for-hire mode, which fails in 32.1 percent of years while the private mode fails in none. And for scup both modes fail, the private mode in 51.9 percent of years and the for-hire mode in 46.4 percent.

Scup is the warning this amendment should take. The failure there is not a property of either mode. It is a property of how few scup each mode releases in New Jersey, and it is already present before this amendment disaggregates anything further.

4. Disaggregation is the mechanism

The clean demonstration holds species, state, mode and type of catch fixed and changes only the level of aggregation — the same black sea bass released by the same anglers in the same years, reported once per year and then once per two-month wave.

Table 3. Effect of aggregation level on estimate precision, New Jersey black sea bass released-alive (Type B2), 1998 to 2025 (percent standard error in percent; failing share as a percentage of the estimates at that aggregation level). Source: MRIP Query Tool.

Mode	Annual median PSE (%)	Annual failing (%)	By-wave median PSE (%)	By-wave failing (%)
Private and rental	20.0	0.0	37.0	30.1
All for-hire	18.9	0.0	35.0	26.9

MRIP divides the year into six two-month waves. Cutting one annual series into its waves roughly doubles the percent standard error and sends between a quarter and a third of the resulting estimates below the threshold the Program sets for usability. Not every wave carries an estimate. Wave 1, January and February, carries none in either New Jersey mode in any of the twenty-eight years, so neither series is ever split more than five ways: the private and rental series carries four or five wave estimates in most years and as few as two, the for-hire series five in most years and never fewer than three. That works against the point made here rather than for it: fewer cells means larger cells, so a series split across all six waves would show a larger penalty than the

one reported in Table 3. No fishing changed, and no sampling changed. Only the size of the cell changed.

The Program states the remedy on every page of output it produces: "MRIP does not support the use of estimates with a percent standard error above 50 and in those instances recommends considering higher levels of aggregation (e.g., across states, geographic regions, or fishing modes)."

Aggregation across fishing modes is the Program's prescribed response to an imprecise estimate. This amendment proposes disaggregation by fishing mode. That is not a reason to abandon the amendment and the commenter does not argue it is. It is a reason the amendment should state which estimates it will rely on, at what level of aggregation, and what precision it requires of them.

5. The same effect across states, and how it compounds

Disaggregating black sea bass releases by state shows the cell-size relationship directly, and shows it governs both modes alike.

Table 4. Black sea bass released-alive (Type B2) annual estimate precision by state and mode, 2016 to 2025, ordered by the number of fish behind the estimate rather than by mode (estimate in numbers of fish, median across years; percent standard error in percent; failing share as a percentage of that state's annual estimates). States with fewer than ten usable annual estimates are shown with the count. Source: MRIP Query Tool.

State	Mode	Median estimate (fish)	Median PSE (%)	Failing (%)
New York	Private and rental	5,451,174	14.7	0.0
New Jersey	Private and rental	5,363,568	15.1	0.0
Rhode Island	Private and rental	2,211,306	15.7	0.0
Massachusetts	Private and rental	1,773,255	18.5	0.0
New York	All for-hire	792,520	13.7	0.0
New Jersey	All for-hire	776,600	16.7	0.0
Delaware	Private and rental	618,380	24.3	0.0
Maryland	Private and rental	400,959	30.4	10.0
Massachusetts	All for-hire	161,795	22.0	0.0
Delaware	All for-hire	24,669	27.1	10.0
New Hampshire (5 years)	Private and rental	7,348	97.5	100.0
Maine (1 year)	Private and rental	1,404	94.6	100.0
Maine (1 year)	All for-hire	548	61.3	100.0
New Hampshire (2 years)	All for-hire	8	95.9	100.0

The table is ordered by the number of fish rather than by mode, and read that way the modes interleave. The four largest cells all carry a median error under 19 percent and none of them fails; the four smallest all exceed 60 percent and all of them fail. New Jersey private boats and New Jersey for-hire vessels differ by a factor of seven in releases and by 1.6 points in median error, because both cells are large. Maine and New Hampshire fail in both modes, because both cells are small. The ordering is not strict — New York for-hire vessels, on 793,000 fish, are measured as precisely as New York private boats on 5.45 million — which is the scatter Section 2 reports as the 54 percent

of variation cell size does not account for. What the table does not show anywhere is a mode which is reliably better or worse measured than the other.

The exposure this amendment creates is the product of its disaggregations rather than any one of them. Catch is already accounted by species and by state. Adding mode multiplies the number of cells again, and any further split by wave or sub-period multiplies it once more. Table 1 gives the consequence: a cell holding fewer than 100,000 fish fails the Program's standard half the time.

6. Releases, the shore mode, and why the minimum size matters here

Every quantity in Sections 2 through 5 is an estimate of fish nobody counted. Released fish are not landed, measured or inspected at an access point. And at current minimum sizes releases are most of the catch.

Table 5. Discard rate in the New Jersey for-hire black sea bass fishery by minimum size in force, May and June, 1998 to 2025 (minimum size in inches; years as a count; discard rate as discards divided by total fish handled, in percent). Source: federal vessel trip report census, CAMS database; see the accompanying findings memorandum.

Minimum size (in)	Years (n)	Period	Discard rate (%)
10.0	3	1998–2000	23.2
11.0	1	2001	37.4
11.5	1	2002	46.1
12.0	6	2003–2008	51.2
12.5	16	2009–2021, 2023–2025	63.7
13.0	1	2022	52.6

At a 12.5-inch minimum roughly 64 percent of the fish handled are released; at a 10-inch minimum the figure was 23 percent. The minimum size therefore determines what share of a mode's catch exists only as an estimate. A lower minimum size moves catch out of the estimated column and into the counted column, which improves the accuracy of mode-level accounting independently of any biological argument about the stock. The commenter asks the amendment to recognize minimum size as an instrument affecting accounting precision and not solely as a conservation control.

The shore mode shows what a small cell looks like at the limit. For New Jersey black sea bass, shore-mode released-alive estimates carry a median percent standard error of 39.0 and fail the standard in 10.7 percent of years. Shore-mode harvest is worse: the Program returns a usable estimate in only 8 of the 28 years, with a median percent standard error of 88.9, and every one of those 8 estimates fails its standard. If the amendment groups the shore mode with private boats, or treats it as a mode of its own, it should say which of those estimates it believes can carry a management consequence.

Effort, by contrast, is well measured in both modes. New Jersey angler-trip estimates by wave carry a median percent standard error of 14.2 for private and rental boats and 10.1 for the for-hire modes, with essentially no failures. The difficulty is not in counting trips. It is in estimating what was caught and released on them.

7. What is requested

1. That the amendment state, for each mode-level action it contemplates — accountability measure, in-season closure, or mode-specific regulation — the minimum estimate precision required to support that action, and the level of aggregation at which precision will be assessed.

2. That the amendment not create an accounting cell to which it then assigns a consequence the cell cannot support. Table 1 offers a usable rule of thumb: below roughly 100,000 fish, half of these estimates fail the Program's own standard.

3. That where a cell's estimates do not meet the MRIP standard, the amendment state how it reconciles mode-level accounting with the Program's own recommendation to aggregate across fishing modes in exactly that circumstance.

4. That the amendment report the percent standard error of released-alive (Type B2) estimates by mode, by species and by state for all four species it covers, since releases rather than harvest are the dominant accounting quantity at current minimum sizes.

5. That minimum size be treated as an instrument affecting accounting precision, for the reason given in Section 6.

6. That the amendment state what it intends to do about scup and about the shore mode, where the estimates already fail before any disaggregation this amendment would add.

8. What this comment does not claim

1. Part of the relationship in Table 1 is arithmetic, because percent standard error is a relative measure. Table 3 is the evidence which does not depend on that, and it is the narrower and more reliable result.

2. Percent standard error measures sampling variance alone. It does not capture bias, coverage error or non-response, and an estimate can be precise and still be wrong. Nothing here should be read as a claim any estimate is correct.

3. One state supplies Sections 2, 3 and 6. Section 5 covers the North and Mid-Atlantic by state for one species. The commenter has not tested the relationship for the other three species outside New Jersey, and request 4 asks the Council to.

4. A mode split is not necessarily adverse to private anglers, and this comment does not assert it is. Measures suited to a fishery which does not run on charter economics could serve private anglers well. The concern here is confined to the accounting on which mode-level actions would rest.

5. No claim is made about stock status and none is required. The northern black sea bass stock is neither overfished nor experiencing overfishing.

Questions are welcome in writing and will be answered in writing. The eighteen MRIP queries and the analysis behind every figure in this comment are organized and will be supplied on request.

Craig A. McIlrath · Marlton, New Jersey · blandmail@comcast.net

FINDINGS MEMORANDUM

New Jersey For-Hire Vessel Trip Reports, Black Sea Bass

May and June, 1998–2025

Craig A. McIlrath · Marlton, New Jersey · blandmail@comcast.net

Data: CAMS database, compiled by S. M. Turner, NOAA Fisheries, retrieved 15 September 2026

Summary

Three findings, in descending order of weight.

1. Averaged by the minimum in force, the discard rate rises at every step from a 10-inch to a 12.5-inch minimum, and the relationship survives control for year — the size coefficient strengthens rather than weakens when year is added. Each additional inch is associated with roughly 15 to 26 percentage points of discard rate depending on specification. The rise holds for the averages rather than for every year, and the one 13-inch season falls below the 12.5-inch average; Section 2 sets this out. The coefficient is stable; the share of variance it explains is not, and Section 3 sets out why.
2. The bag limit does not bind and never has. Across four bag levels at a constant 12.5-inch minimum, mean retention per angler never approached the limit, and the bag coefficient is near zero once minimum size is in the model. A bag reduction is therefore empirically inert as a control on harvest in this fishery.
3. Anglers per trip is flat across the full series — mean 19.1, with no trend. Vessel-trips are therefore a valid effort proxy, and the per-open-day comparisons are not confounded by changes in vessel size or party composition.

Finding 2 rules out a bag reduction as a harvest control here. Findings 1 and 3 bear on the size-limit relationship and on the effort denominator.

1. Data and coverage

The series covers all months, 1998 through 2025, for federally permitted recreational vessels landing black sea bass in New Jersey. Nineteen month-year cells are marked confidential and cannot be released; none falls in May or June, so the analysis below uses a complete record with no imputation.

Open days are taken from Annex A and count calendar days within May and June only. Minimum size and bag limit are likewise from Annex A, primary-sourced for every year from 2011 forward.

2. The size-limit relationship

Table 1. New Jersey for-hire black sea bass, May and June, by year. Minimum size in inches as New Jersey defines the length; bag limit in fish per angler per day; open days in calendar days; trips in vessel-trips; anglers per trip in anglers; anglers in persons; retention in fish per angler; attainment as retention divided by bag limit; discard rate as discarded fish divided by total fish handled.

Year	Min size	Bag	Open days	Trips	Anglers/trip	Anglers	Kept/angler	Attainment	Discard rate
1998	10.0	none	61	776	19.2	14,871	4.62	—	19.8%
1999	10.0	none	61	714	21.4	15,248	6.71	—	21.1%
2000	10.0	none	61	785	20.1	15,770	10.31	—	28.6%
2001	11.0	25	52	823	18.8	15,436	7.41	29.6%	37.4%
2002	11.5	25	61	975	22.4	21,887	9.70	38.8%	46.1%
2003	12.0	25	61	947	19.7	18,684	11.04	44.2%	45.4%
2004	12.0	25	61	871	19.0	16,551	5.50	22.0%	52.6%
2005	12.0	25	61	681	18.0	12,266	4.15	16.6%	49.6%
2006	12.0	25	61	710	17.5	12,435	3.08	12.3%	44.3%
2007	12.0	25	61	823	17.4	14,304	3.79	15.2%	53.6%
2008	12.0	25	61	833	16.7	13,940	3.79	15.1%	61.6%
2009	12.5	25	61	786	16.6	13,057	3.02	12.1%	79.0%
2010	12.5	25	40	794	17.7	14,048	2.80	11.2%	67.9%
2011	12.5	25	39†	534	18.6	9,924	1.43	5.7%	77.3%
2012	12.5	25	43	737	18.8	13,859	3.91	15.6%	64.9%
2013	12.5	20	43	720	20.0	14,371	2.91	14.6%	64.4%
2014	12.5	15	43	618	18.2	11,268	2.11	14.1%	60.1%
2015	12.5	15	35	614	17.9	10,995	3.00	20.0%	65.4%
2016	12.5	10	28	472	19.5	9,221	2.97	29.7%	72.5%
2017	12.5	10	24	519	18.3	9,475	3.78	37.8%	70.9%
2018	12.5	10	39	721	19.7	14,203	2.99	29.9%	67.6%
2019	12.5	10	39	861	20.9	17,991	4.16	41.6%	62.2%
2020	12.5	10	39	871	17.9	15,589	5.55	55.5%	55.8%
2021	12.5	10	39	954	20.7	19,785	5.32	53.2%	46.0%
2022	13.0	10	34	879	18.7	16,402	5.51	55.0%	52.6%
2023	12.5	10	34	1,014	20.1	20,358	5.62	56.2%	53.5%
2024	12.5	10	34	940	20.6	19,331	4.25	42.5%	54.5%
2025	12.5	10	34	979	21.1	20,642	6.18	61.8%	57.7%

† 2011 open days carry an unresolved conflict between two New Jersey publications, 39 days on the Attention Anglers flyer or 27 days on the May 2011 Digest. See Annex A, Section A.2. No figure outside this row depends on it.

Table 2. Retention and discard rate grouped by minimum size in force. Minimum size in inches; retention in fish per angler; discard rate as a share of total fish handled; bag limit in fish per angler per day.

Min size (in)	Years (n)	Period	Kept/angler	Discard rate	Bag limits in force
10.0	3	1998–2000	7.21	23.2%	none in force
11.0	1	2001	7.41	37.4%	25
11.5	1	2002	9.70	46.1%	25
12.0	6	2003–2008	5.22	51.2%	25
12.5	16	2009–2021, 2023–2025	3.75	63.7%	25, 20, 15, 10
13.0	1	2022	5.50	52.6%	10

Averaged by minimum size, the discard rate rises at every step from 10 inches to 12.5 inches: 23.2 percent, 37.4, 46.1, 51.2, 63.7. It does not rise year by year. Annual values overlap between adjacent levels: 2002 at 11.5 inches (46.1 percent) sits above 2003 and 2006 at 12 inches (45.4 and 44.3 percent) and above 2021 at 12.5 inches (46.0 percent). The 2022 season at 13 inches breaks the pattern at 52.6 percent, below the 12.5-inch average. It is a single year, and the 12.5-inch group spans sixteen years with a wide internal range, 46.0 to 79.0 percent.

Table 3. Bag limit steps at a constant 12.5-inch minimum, 2009–2021. Bag limit in fish per angler per day; retention in fish per angler; attainment as retention divided by bag limit; discard rate as a share of total fish handled.

Bag limit	Years (n)	Period	Kept/angler	Attainment	Discard rate
25	4	2009–2012	2.79	11.2%	72.3%
20	1	2013	2.91	14.6%	64.4%
15	2	2014–2015	2.56	17.0%	62.8%
10	6	2016–2021	4.13	41.3%	62.5%

3. Separating size limit from time

Minimum size rose monotonically through the first half of the series, so minimum size and year are correlated at 0.78. If the apparent size-limit effect were really a time trend — rising abundance, changing fleet behavior — controlling for year would absorb it.

It does not. Adding year raises the minimum-size coefficient from +0.155 to +0.194 and gives year a small negative sign. Year alone explains less than half as much variance as minimum size alone. Adding bag limit changes nothing: its coefficient is +0.005 and the size coefficient stays above +0.2.

Table 4. Linear models of May–June discard rate. Coefficients in discard-rate proportion per unit; minimum size in inches; year in years since 1998; bag limit in fish per angler per day; n in years. No bag limit was in force 1998–2000, so those three years are dropped from any model containing bag rather than assigned a value, and the size-only and size-plus-year models are reported both with and without them.

Model	Min size	Year	Bag limit	R^2	n (years)
Minimum size only, all years	+0.155	—	—	0.702	28
Minimum size only, excl. 1998–2000	+0.158	—	—	0.357	25
Year only, all years	—	+0.0101	—	0.299	28
Minimum size + year, all years	+0.194	−0.0051	—	0.732	28
Minimum size + year, excl. 1998–2000	+0.261	−0.0074	—	0.457	25
Minimum size + bag, excl. 1998–2000	+0.216	—	+0.0054	0.441	25

Within the constant 12.5-inch period the discard rate falls about 1.3 percentage points a year, from 79.0 percent in 2009 to the mid-50s recently, while retention per angler rises about 0.2 fish a year. Something other than the size limit moves the discard rate substantially inside a fixed regulatory regime — most plausibly availability. That variation is real and should be acknowledged, but it runs against the size-limit effect rather than explaining it away.

How much rests on three years

The design is unbalanced and the imbalance matters. Sixteen of the twenty-eight years sit at a 12.5-inch minimum, six at 12.0, and only three fall below 11 inches. Those three — 1998, 1999 and 2000 — carry the entire low end of the size range, and they are also the first three years of the series, the period the compiler flags as likely under-reported for discards.

Excluding them, the size-only model falls from R^2 0.702 to 0.357, and size plus year from 0.732 to 0.457. The coefficient itself barely moves: leave-one-out over the full series shifts it by at most 0.01, and dropping the three years moves it from +0.155 to +0.158. The direction and magnitude of the relationship are therefore robust, while the share of variance explained is not. Any statement that minimum size accounts for seventy percent of the variation is true only with those three years included and should not be made without saying so.

The practical consequence is that the strongest available test is not a better regression on this series. It is the 2026 reductions, where several states moved their minimums within a single year while the rest of the fishery held, and where Delaware's half-inch cut from 13.0 to 12.5 inches falls inside the range this relationship was fitted on.

4. What the bag-limit result means

A bag reduction does not control harvest in this fishery

A reduction in the bag limit is a common instrument for offsetting harvest, on the reasoning that anglers who fill a smaller bag sooner take fewer fish. The data do not support that reasoning here. At a 25-fish bag the average angler kept 2.79 fish, eleven percent of the limit. At a 10-fish bag the average angler kept 4.13 fish. Retention shows no ordered response to the ceiling across the four steps — it is lowest at

the 15-fish bag and highest at the 10-fish bag — which is the pattern expected when the limit is not the operative constraint and something else, most plausibly availability, is moving retention instead.

A limit almost no one reaches cannot be tightened to reduce harvest. Attainment at the 10-fish bag reaches 62 percent in the best recent year, so a cut would bite on the upper tail of trips only. Monthly aggregates cannot show that distribution, and the tail may matter more than the mean — but the mean rules out the bag limit as a general control on harvest.

Two cautions on reading the results together

First, harvest is managed against landed weight, while the discard-rate relationship in Section 2 describes what share of encountered fish are legal. These are different quantities, and a change in one does not translate directly into a change in the other.

Second, anglers are demonstrably not keeping every legal fish — retention runs at three to six fish per angler against a ten-fish limit. A rise in the legal share of encountered fish therefore does not translate one-for-one into harvest.

5. The effort denominator and period comparisons

Vessel-trips are a valid effort measure for this series. Mean 19.1 anglers per vessel-trip, ordinary least squares slope +0.019 per year, 1998–2004 mean 20.08 against 2019–2025 mean 19.99. Vessel-trips track angler effort across the full series and no correction is needed.

Computed on the open-day counts in Annex A, the two recent periods compare as follows. For 2012–2018 against 2019–2025: trips per open day 17.54 against 25.86, anglers per open day 332 against 518, retention per angler 3.10 against 5.23, discard rate 66.5 percent against 54.6 percent. Excluding 2022 and comparing 2016–2018 against 2019–2021 plus 2023–2025 gives 18.99 against 25.86 trips per open day and 70.3 percent against 55.0 percent discard rate.

RHODE ISLAND
SALTWATER
ANGLERS
Association

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September 4, 2026

Mid-Atlantic Fishery Management Council and
Atlantic States Marine Fisheries Commission
c/o Kiley Dancy
via email: kdancy@mafmc.org

RE: RISAA Opposition to Sector Separation

Dear Kiley,

The Rhode Island Saltwater Anglers Association (RISAA) represents over 7,500 recreational anglers primarily in RI, MA and CT. Our members include mostly private anglers, but also many charter boat operators in this region. We understand that there is a Workshop on Sector Separation that will be held September 23 & 24, but due to other commitments no one from our organization is able to attend. We are submitting this comment letter prior to the meeting so that our thoughts on the matter may be known to Workshop organizers and participants. We would also like this letter to be included as part of the official comments on this issue.

RISAA has long opposed sector separation due in large part to a fairness issue. Why should anglers be allowed more favorable regulations on one boat rather than another just because they paid to be on that boat? That seems to give a business an unfair advantage over the private angler, sometimes fishing at the same location and in the same manner. This does nothing to help rebuild fish stocks or improve fishing for the general angling public. It simply takes fishing opportunities away from the general fishing public and gives more opportunities to those who pay a business to go fishing on a charter or head boat. The for-hire sector is pushing for this now to grab more fish for their businesses.

RISAA has also opposed sector separation because it weakens both representation of the recreational fishing community and it weakens the data available to estimate the recreational catch. Representation is weakened because many of the individuals who are active in State and Regional fishery management boards representing recreational fishing are employees or owners of party and charter businesses. Private anglers typically have jobs outside the fishing industry and cannot afford the time it takes to be involved in these management boards. If sector separation is advanced how will managers recruit people to represent the largest sector of the recreational fishing public – the private angler? Regarding data quality, it is clear that current methods to estimate recreational catch have significant shortcomings. The major revision of catch estimates recently announced by NOAA because of another change in the fishing effort survey (FES) further indicate the inaccuracy in current methods. Removal of party and charter catch estimates from the recreational data will only increase the percent standard error (PSE) in the catch estimates for private recreational anglers. This will only serve to further reduce allowable catch for the majority of recreational anglers.

The recent NOAA announcement of FES revisions significantly lowered private shore and boat catch estimates but left for-hire estimates unchanged. These changes and how they would affect any possible sector separation are not fully understood and RISAA is concerned that any attempts at sector separation will use these changes to divide the recreational fishing allocation in a way that favors the for-hire sector over private anglers. It is bad enough that recreational anglers are constantly competing with commercial fishermen for allocation of quota. Please don't make matters worse for the general fishing public by adding sector separation to the complex quota allocation mess.

In recent years State regulators have allowed some size and bag limits to be different for the for-hire boats largely because of the argument that their catch is such a small fraction of the recreational catch that more favorable regulations for them would not significantly increase the total recreational catch. These new FES estimates now show that the for-hire catch has been a higher percentage of the recreational catch. We doubt if that will now result in reconsideration of those "special" regulations for for-hire vessels.

The bottom line is that the sector separation effort does nothing to protect the fish, improve our fish stocks, or improve our understanding of how many fish are harvested by recreational fishing efforts. It simply creates another battlefield where groups will fight each other for a bigger piece of the very limited fish resources. Please register our opposition to this effort.

If you have any questions regarding our stance on this issue or if you would like to contact us we have given contact information below.

Sincerely,

Scott A. Travers

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Sector Separation Green

Comments and Reactions from Paul Risi Following Sector Separation Workshop

-Using the phrase Mode Management will go a long way to both clarify the intent and ease tension and misunderstanding amongst the public.

-Clarifying the “party boat/charter boat” confusion. These terms have regional variation. Most industry members consider charter boats to be “six packs,” or uninspected vessels that carry six or less passengers by CG mandate. Party boats are considered to be the inspected, or multi-passenger vessels that carry a current Certificate of Inspection for small passenger vessels issued and maintained by CG Sector inspection offices. From a business process aspect, a charter trip is when a vessel is booked by a single group of people, whereas a party boat trip is a trip that sails at a scheduled time with clients that either walk on or make reservations, but are single persons or smaller groups that are a portion of the total number of clients for that trip.

I recommend committing to using the terms inspected and uninspected for the two groups, as those are the proper legal terms to describe them and will eliminate any confusion.

-Moratorium and Limited Entry. It is clear that nobody wants a moratorium on permits, although ere is significant merit in it. However, that is another conversation. As for limited entry, I was disturbed by the significant opposition to the idea, even though everyone wants to prevent casual charterers and private boats from getting into the mode just to have better regs. My impression of limited entry is that it limits who can enter the mode and get a permit. If the intent of the limited entry is to only allow valid for hire operators into the system, then that serves the purpose.

-Vetting current and future participants is a great challenge. State permitting and regs (current and future) don't and probably never will be sufficient and appropriate. Without the Policy Board setting a minimum set of standards for historical and future participants, it would result in an unfair system that punished operators in states with proper and robust permitting and reporting requirements while allowing those in states with weak requirements to enter more easily, including unqualified operators. Although it is my opinion that the states have the potential to vet participants better (Each knows their operators better and most can legislate more specific requirements), it has become fairly clear that some states are restricted by legislation from adequately regulating entry, and others simply will not.

-The most practical licensing method would be through the federal permit, most probably with a two-or-three-tiered system.

-A federal three tiered system structure. Tier One- Full participation in for-hire regs and fixed in the program. Tier Two- Participating in the regs in a probationary status, with special extra conditions for vetting. Violations of the probationary process result in disqualification. Tier Three- A status-quo version of the current for-hire permit.

-One qualification that I feel is very simple and can be used in the federal permit is automatic entry for inspected vessels. Inspected vessels require thousands of dollars in up-front safety equipment and crew training, Vessels must be built to or meet exacting standards. $300 annual inspection fees, annual safety inspections and drills, and out-of-water internal and external structural inspections (Drydock). They also are required to maintain and show a current random drug screening program for all crew members. The Certificate of Documentation is a federally issued document, issued every year, and easily verified.

-Vetting uninspected vessels is the challenge, both for current operator entry and future entry.

-For operators with federal permits or states with VTRs, we can easily establish qualifications as discussed at the

workshop. Say 25-50 VTRs annually, 70-130 over a three-year period, or 25-50 VTRs annually or three years in a five-year period.

-Vetting for operators in states without reporting requirements fairly and properly would probably require a unique set of standards or processes. As the Service is restricted in what processes they can apply due to regulation and staff burden, it is feasible for the Policy Board to put forth a suite of standards and processes that can be used to vet entrants into the original Tier 1 group. Although some states cannot institute a permit, and some will not, it may be feasible that they can establish a review board or other one-time process that considers operators based on a suite of qualifying standards.

-Possible vetting standards-

-In consideration of standards for original permits, it is important to keep in mind that we are focused on permitting vessels that have actually been active in the industry before the concept of sector separation or mode management came to be, and also operators that are genuinely interested in entering the industry and not reg shopping.

--Possible standards that states may be able to implement as a screening process as opposed to a regulatory process are:

-Liability insurance. Although it is not certain proof of business, it does raise the financial burden.

-Drug Screening. It is mandatory for all passenger carrying vessels (inspected and uninspected), many uninspected vessels are not enrolled in a program because there is not the same annual review associated with inspected vessels. Requiring one or more years of documented random drug screening after the control date is a viable, strong screen.

-Income. Proof of a percentage (15%) or minimum income ($15,000) from for-hire or commercial fishing.

-Log books. Logbooks with dates sailed, passenger count and other references to carrying passengers. As this is an unofficial, unformatted set of data, it should require a heavier burden of proof, such as fifty percent more than vessels with VTRs, and/or several years at a higher trip rate.

-Crew Payroll. An operator that can show proof of business by producing payroll showing deckhand salary covering a similar number of trips as log books or maybe VTRs.

-State Certified Review Boards. This can be controversial, but the potential familiarity that a state has with their industry can develop a group of state staff and/or industry leaders that can review and attest to the validity of an operator's involvement in the industry per standards set.

-Historical advertisements and fishing reports. Although not ideal, historical ads and fishing reports from industry periodicals and local newspapers can be a strong validation of historical participation.

-Memberships. This standard can be dubious if not approached properly, but membership in various validated charter associations or cooperatives can support eligibility.

-Equity. Actual for-hire operators should be included in the Tier 1. However, less traditional vetting processes (Those that are not based on federal or state permits and VTRs) should not be less effective than the primary standard; annually renewed permits and requisite VTRs. It should not be easier to qualify for Tier 1 in a state with no permit or reporting requirements than it is in a state with clear permitting and reporting requirements.

-A strong method to include undocumented historical participants and also allow for controlled entry of new participants would be a high-level reporting system, such as a call-in call-out requirement. This status should also carry the requirement for private trips made by participating vessels. This gives enforcement positive evidence to work from during a boarding, and increases VTRs from the private sect. or.This burden may serve to deter casual reg shoppers. A further restriction should be added that failing to follow the

procedure (missing a report or being boarded and not having called in) results in immediate expulsion from the program, and possibly a one to three year ban on re-entry.

-Latent Permits. Assuming that federal permits will be the standard for the action, standards of reporting similar to the vetting process may be used to eliminate latent permits. Requiring 100 VTRs from the control date through 2/11/2027, with at least 20 trips during the period between 2/11/25-2/11/26 should validate the vast majority of legitimate operators to qualify for Tier 1.

-LOA. An LOA is a smart introduction into the process. Rather than setting an amendment only to find it will need another amendment process to perfect or stabilize, the LOA process will provide great insight to the proper mechanisms to effectively institute the process. I feel that the workshop attendees vilified the LOA based on esoteric exposures and hearsay.

-Removal of scup and bluefish. Bluefish and scup are already subject to mode management through an ad hoc process. Scup is working fine as it stands. Bluefish are cyclic in abundance that is historically recognized. Including bluefish in the process introduces several issues. First, as it

seems we are moving into a period of higher biomass, mode management may prove to be significant effort in a new process that will soon become irrelevant. Second, bluefish is a separate FMP. Third, it is evident that at least a few states are strongly opposed to mode management mainly because bluefish is included. It would be tragic to see the process never even be tested because it failed due to bluefish being included.

-Shore Mode. I feel strongly that the shore mode should have a management consideration, although the fundamental reasons are very different. Kayaks, canoes, and personal watercraft should not be included in the shore mode. I know of kayak fishermen that travel further offshore that I do in my 18' skiff.

Dancy, Kiley

From: Christopher Dos Santos <dexhandsupplycompany@gmail.com>
Sent: Monday, September 28, 2026 10:27 AM
To: Dancy, Kiley
Cc: tbauer@asmfc.org
Subject: Sea Owl input following sector-separation workshop: fishing power, access and workable reporting

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from dexhandsupplycompany@gmail.com. Learn why this is important

Dear Ms. Dancy and Ms. Bauer,

Please share this input from Sea Owl Fishing Charters, New Jersey, with the Recreational Sector Separation Amendment team and the Council and Commission bodies developing the alternatives following the September 23–24 workshop.

My position is that management of fluke, black sea bass, scup and bluefish must account for how fishing actually works today. GPS, detailed bathymetry, advanced sonar, position-holding equipment and shared coordinates can increase the pressure placed on fish and individual pieces of bottom. Separating charter boats from private anglers will not solve that problem unless the analysis measures changes in effective fishing power within both groups.

Please explain how revised recreational survey estimates and their uncertainty will be used alongside for-hire trip reports. Compare the sectors using appropriate data, and do not treat the number of trips as a complete measure of fishing pressure.

For charter operators, assess alternatives against predictable, biologically defensible seasons and rules that can be communicated to customers before bookings are made. Evaluate the seasonal business impacts of fluke and sea bass transitions and proposed future changes to scup and bluefish measures.

Any new permit, Letter of Authorization or limited-entry system needs a clear justification, fair treatment of established working operators, transparent eligibility and appeals, and an analysis of effects on future access. Reporting should capture useful data with minimal duplication, including a practical workflow where offshore connectivity is poor.

Please confirm receipt and explain how this input will reach the amendment team and decision-makers.

My book, Stolen Sea: How Our Secrets Became Subscriptions, explains the fishing-technology and access issues behind my position: https://www.amazon.com/dp/B0H49ZZ7QH

Captain Chris Dos Santos Junior
Sea Owl Fishing Charters

P.S. If you don’t read the book and solve the actual problems in the ocean, none of this matters.

Recreational Angler Partnership Improvement Directive (RAPID) Initiative

ISFMP Policy Board
Thursday November 12, 2026
8:00 – 11:00 a.m.

Background:
In April 2026, NOAA Fisheries introduced RAPID as a core component of its updated National Saltwater Recreational Fisheries Policy. RAPID is designed to modernize the way saltwater recreational fishing data is collected and managed by transforming the existing Marine Recreational Information Program (MRIP).

The RAPID initiative is a process to re-confirm agency partnerships, and co-design future recreational fisheries data collection among the states, commissions, councils, and NOAA. Eight regional workshops are being planned collaboratively with representatives across state-federal agencies. Please see attached RAPID Factsheet and Tentative workshop schedules.

Tentative Dates	**Region (states)**	**City**
January 5-7, 2027	Mid-Atlantic (NY-NC)	Philadelphia, PA
January 11-13, 2027	South Atlantic (NC-FL)	Charleston, SC
January 20-22, 2027	New England (ME-NY)	Boston, MA
February 2-4, 2027	Pacific (WA-CA)	TBD
February 8-9, 2027	Caribbean (PR-USVI)	TBD
March 1-3, 2027	Gulf (FL-TX)	New Orleans, LA
TBD	North Pacific (AK)	TBD
TBD	West Pacific Islands	TBD

What You Need to Know



RAPID: The Recreational Angler Partnership Improvement Directive

RAPID is a **collaborative process** to remodel recreational fisheries data collection. Together, we will assess needs and determine what improvements would support a modernized and adaptive partnership framework. The goal is to support the refinement of existing recreational data programs, while creating opportunities for new approaches, to better support fisheries management needs. RAPID action planning workshops, beginning in late 2026, will activate perspectives from states, regions, NOAA, and the fishing community. The outcome will be a regionally flexible yet cohesive system that improves fisheries management, builds trust and confidence in fisheries data, and strengthens recreational fisheries partnerships across the country. Your participation is vital to this initiative.

RAPID Goal

Improve recreational fishing data collection through state-regional-federal partnership.

Workshop Objectives

1. **Enhance Data for Management:** Identify strategies to strengthen the quality and quantity of recreational fisheries data.
2. **Modernize Data Standards:** Refine data quality, transparency, and access standards to inform an updated data enterprise.
3. **Co-develop regional action plans:** Create data collection and governance plans that reflect regional and state priorities and capabilities while contributing to a national framework.

At least one additional **national angler workshop** will verify key regional takeaways and help inform the action plans.

The RAPID Process

8 Regional Workshop Planning Teams



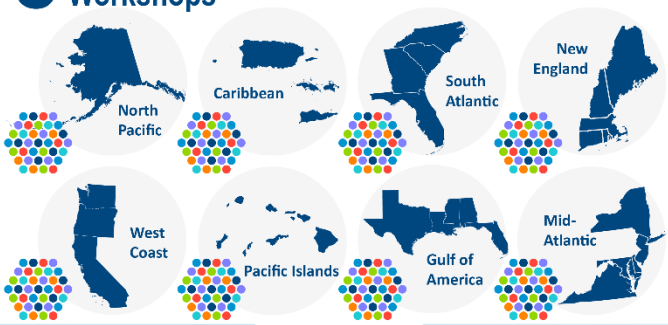
Fisheries Perspectives

Sample - does not represent all planning teams

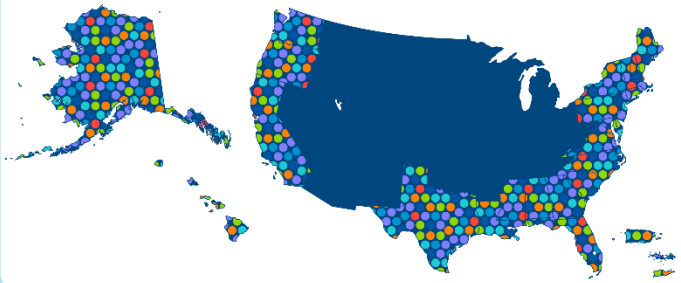
- RAPID Steering Committee
- Fishery Management Council
- Marine Fisheries Commission
- State Marine Resource Department
- NOAA Fisheries Science Center
- NOAA Fisheries Regional Office
- Fishing Community
- NOAA Fisheries Science and Technology

8 Regional Workshops

Planning teams identify workshop participants



1 Regionally Flexible Data Collection Framework



Steering Committee

Gregg Bray *– GSMFC*
Alex DiJohnson *– ASMFC*
Dr. Nancy Leonard *– PSMFC*
Dr. Luiz Barbieri *– FL FWRI*
Dr. Jon Hare *– NOAA Fisheries*
Dr. Evan Howell *– NOAA Fisheries*
Tim Sartwell *– NOAA Fisheries*
Anna Mehlhorn *– NOAA Fisheries*

RAPID Timeline

April 2026 *– National steering committee is established*

July 2026 *– Keystone Policy Center is selected to facilitate workshops*

September 2026 *– Keystone works with regional planning teams to coordinate workshop logistics*

December 2026 - March 2027 *– Hold RAPID regional workshops*

Spring 2027 *– Prepare action plans based on workshop takeaways*

Summer 2027 - onward *– Partners announce the agreed-upon framework and execute action plans*

NOAA FISHERIES

Photo Credit: Chesapeake Bay Program

RAPID: Frequently Asked Questions

Meaningful change takes time, and we aim to build a durable program with our partners. RAPID is the *process* of defining a modernized and partnership-driven recreational fishing data enterprise.

The RAPID partnership model: What is the RAPID process going to provide?

RAPID is pursuing a regionally flexible yet nationally cohesive approach to marine recreational fisheries data collection. This process supports the collaboration necessary for consistent quality of recreational catch and effort estimates, data precision, accuracy, usability, and credibility. The revised partnership will promote true co-ownership of our data collection systems to better meet state and federal data needs. Partners will share in the design and implementation of a data system that allows for greater tailoring to regional needs while maintaining nationally cohesive elements.

What will happen to MRIP and state surveys during and after the transition?

The outcome of RAPID may introduce new recreational fishing survey methods. For any new surveys, existing surveys will be used as a "bridge," so there will be no abrupt management changes. This way, federal and state management can preserve scientific robustness and continue without disruption.

How will this partnership be different from MRIP?

This initiative will rely more heavily on state and regional partnerships during framework design and implementation phases. NOAA will provide the statistical expertise and technical support to ensure data systems are valid and useful for management. We want to empower our partners to develop and use systems that fit their needs and ensure fishery management standards can still be achieved.

Will states have to do their own independent data collection for recreational fisheries?

No, RAPID does not mean federal support for recreational data collection is expiring. We will work together to identify the resources to ensure data are scientifically robust and meet management needs at different scales—state, regional, and federal—while clarifying roles and responsibilities.

Does RAPID have any predetermined outcomes?

RAPID is open-ended by design. The process will rely on partnership to recommend improvements to current recreational fisheries data collection systems, and we do anticipate updates to these systems. However, regardless of the nature or scope of these updates, RAPID is an opportunity to strengthen partner relationships and foster a more constructive dialogue surrounding recreational fisheries data.

How will the new executive order impact RAPID, and how are the two intertwined?

Although RAPID was not explicitly mentioned in the EO, the shared intent is to produce better recreational fishing data. The RAPID process supports EO implementation as it is currently designed, and we do not anticipate major changes to the approach. Inputs on the EO directives will be welcome during the RAPID regional workshops.

Is Funding Available for RAPID Workshop Participants?

The goal of RAPID is to have the necessary experts participate in the regional workshops. If travel support is needed, please reach out to a member of the steering committee.

How long is the transition expected to take?

The RAPID process is expected to be completed by summer 2027, at which point the implementation of regional action plans will begin.

RAPID Contacts:
Tim Sartwell (Tim.Sartwell@noaa.gov)
Anna Mehlhorn (Anna.Mehlhorn@noaa.gov)
RAPID Webpage