

Evaluation of Vessel Baseline Restrictions
for Fisheries Managed by the
New England & Mid-Atlantic Fishery Management
Councils

A white paper developed by staff of the
New England and Mid-Atlantic Fishery Management Councils,
in partnership with the
Greater Atlantic Regional Fisheries Office

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1. Introduction

Vessel baseline regulations restrict the size and horsepower of vessels in many limited access fisheries managed by the New England and Mid-Atlantic Fishery Management Councils (Councils). The Councils originally implemented these restrictions at a time when effort controls were the primary tools used to limit catch, prior to the advent of annual catch limits. The intent was to limit potential increases in catch that could occur if vessels increased in size or horsepower and therefore could catch more fish for a given amount of effort than managers expected. Unchecked increases in catch could undermine the intent of limited access fisheries. Vessel baseline restrictions also served to help maintain the vessel size diversity of the fleets.

Some industry participants have reported challenges in acquiring suitable replacement vessels or engines that meet their baseline specifications, particularly for smaller vessels. In 2025, the Councils recommended reconsidering the vessel baseline restrictions in response to *Executive Order 14276: Restoring American Seafood Competitiveness*.¹ The Councils prioritized an evaluation in 2026 to inform whether to initiate a future action to consider revisions to these restrictions.²

This white paper compiles background information, permit and vessel data, and input from members of Advisory Panels and the public. The purpose is to inform a decision by the Councils on whether to initiate a management action to consider revising vessel baseline restrictions.

2. Current Vessel Baseline Restrictions

Under current regulations ([50 CFR 648.4\(a\)](#)), a fishing vessel's length cannot exceed 10% of the length overall³ and its engine cannot exceed 20% of the horsepower of the permit's baseline vessel. The baseline vessel is the vessel that had the relevant permit during the specified baseline year, which varies by permit type (Table 1).

If a vessel is issued more than one limited access or moratorium permit, those permits are bundled together as a "permit suite." In cases where the permits in the suite have different baselines due to being previously associated with different vessels, the most restrictive baseline applies to the entire permit suite. The only way to eliminate a more restrictive baseline from a permit suite is to permanently relinquish the relevant permit(s). This is often done by requesting to have the restrictive permit(s) permanently relinquished when conducting a vessel replacement or merging permit suites.

The baseline specifications do not change when a permit or permit suite is transferred to a different vessel. For example, moving permits to a smaller vessel does not establish a new,

¹ [Mid-Atlantic Council September 30, 2025 letter to NOAA Fisheries.](#)
[New England Council September 30, 2025 letter to NOAA Fisheries.](#)

² [Mid-Atlantic Council 2026 Implementation Plan.](#)
[New England Council 2026 Priorities.](#)

Based on the tasking from the Councils, this evaluation considers length and horsepower baseline restrictions. It does not consider hold capacity restrictions which exist in some Council-managed fisheries.

³ For the rest of this document, the term "length" refers to "length overall," which is a measurement documented by the Coast Guard.

smaller baseline. Conversely, transferring permits to a larger vessel does not increase the baseline. Limited access permits may only be transferred from one vessel to another once per fishing year.⁴

Vessel baseline restrictions apply to most commercial limited access fisheries managed by the Councils, including Northeast multispecies (except Handgear A permits), Atlantic sea scallop, summer flounder, Maine mahogany quahog, longfin squid (except Tier 3 permits), *Illex* squid, butterfish, Atlantic mackerel, scup, black sea bass, monkfish, Atlantic herring, and Atlantic deep-sea red crab. The restrictions do not apply to recreational permits, commercial fisheries managed with individual fishing quotas or individual transferable quotas, open access permits, and the following limited access fisheries: General Category sea scallop, lobster, and the exceptions noted above.⁵

The current vessel baseline restrictions have been in place since 2015. The first restrictions on vessel size went into effect in the late 1970s and have evolved over time. More information about prior regulations is in Appendix I.

Table 1. Baseline year by permit type.

Permit Type	Action	Year
Northeast multispecies	Amendment 5	1994
Sea scallop	Amendment 4	1994
Red crab	Original FMP	1999
Summer flounder	Consistency Amendment	1999
Scup	Consistency Amendment	1999
Black sea bass	Consistency Amendment	1999
Longfin squid	Consistency Amendment	1999
<i>Illex</i> squid	Consistency Amendment	1999
Butterfish	Consistency Amendment	1999
Maine mahogany quahog	Consistency Amendment	1999
Monkfish	Original FMP	2000
Atlantic herring	Amendment 1	2007
Atlantic mackerel	Amendment 11	2011

3. Administration of Baseline Restrictions

Baseline restrictions are administered by the National Marine Fisheries Service (NMFS) Greater Atlantic Regional Fisheries Office (GARFO). When a permit holder wants to replace a vessel or engine, or modify the horsepower, a [Vessel Replacement Application](#) is submitted to the GARFO Permits Office. The Permits Office then reviews the proposed replacement or modified

⁴ Except for lobster-only permits suites, which are not subject to baseline restrictions.

⁵ For the rest of this document, longfin squid, sea scallop, and Northeast multispecies refers only to those permit categories subject to vessel baseline restrictions (i.e., excluding longfin squid Tier 3, General Category sea scallop, and Northeast multispecies Handgear A permits).

engine's horsepower and/or vessel's length specifications against the baselines for their permit(s) to ensure they are within the maximum allowable increase for their permit(s).

Vessel owners often conduct their own permit baseline research before buying a vessel or submitting a replacement application. The Permits Office responds to about 175 baseline requests each year from prospective buyers and vessel owners for detailed information on the permit's physical specifications. These official communications outline the currently recorded baseline dimensions and the maximum allowable specification limits under applicable permit regulations. By providing this comparative data, the Permits Office ensures permit holders have clear, transparent guidelines to maintain compliance when considering vessel or engine replacements, modifications to length or horsepower, or permit transfers.

The Permit Office uses several pieces of information to document the length and horsepower of vessels. For length, the Permit Offices uses a Certificate of Documentation (COD) from the United States Coast Guard (USGC), which the USGC requires of all commercial vessels five net tons or greater. The Permits Office uses the length measurement listed in the COD as proof of the vessel length.

If a vessel does not have a USCG COD, applicants must verify length by providing a marine survey report indicating the length and showing the name and location of the marine surveyor. GARFO uses the length from the survey and the length indicated on the State Registration in their application review. GARFO will not accept a third-party marine survey if it states that the length is less than the length stated in the State Registration.

The USGC COD does not include proof of horsepower, so all applicants must verify total engine horsepower by providing a marine survey, mechanic certification on the mechanic's letterhead, or engine manufacturer specification and proof that the engine was installed on the vessel.

All length and horsepower documentation must be dated and include the name and documentation number of the vessel. In all cases, the length and horsepower measurements must be equal to or less than the maximum allowable increase for the baseline specifications for the relevant permits, otherwise the application is rejected, even if the difference is very small (e.g., a matter of inches). However, the permit data indicate that a small percentage of vessels across most fisheries currently exceed the maximum allowable length and/or horsepower of their baseline permits (1-8% of permits depending on the fishery, except for red crab; Table 2), highlighting the challenges with enforcing the regulations.

There are two main reasons why some vessels currently exceed their maximum allowable permit baseline. First, reviewing vessel replacement applications can be complicated when vessels have more than one permit, because the baseline specifications for all permits must be identified to determine the most restrictive baseline. Therefore, in the past 30 years, processing errors may have occurred resulting in an overage on one or more baselines. Second, there are cases where previously accepted documentation recorded a replacement vessel's length or engine horsepower was lower than the maximum allowable, but subsequently other information (e.g., USCG COD) demonstrated that the maximum allowable baseline specifications were in fact exceeded.

GARFO can consider requests to correct a vessel baseline, but these are only granted in cases where it can be shown that GARFO made an error in establishing the baseline or the vessel owner has contemporaneous documentation showing a vessel's length or horsepower were different at the time a baseline was created. Processing correction requests can involve extensive research of the vessel and permit history, which may delay business decisions for the buyer or seller of a permit, or a permit holder trying to complete a vessel modification or replacement.

Because of the pre-screening process, official application denials are rare. Over the past 10 years, the Permits Office has denied 12 permit transfer applications because the replacement vessel's length or engine horsepower exceeded the maximum allowable increase for the permit suite. Applicants are typically aware if their proposed replacement or modification meets the baseline criteria prior to filing. Consequently, non-compliant configurations are usually identified and addressed during the initial inquiry stage.

Additionally, owners may relinquish one or more baseline permits to allow for a vessel replacement when the new vessel exceeds the maximum allowable baseline specifications. In the past five years, 84 permits with baselines from 26 suites were relinquished during the replacement process because the replacement vessel exceeded the maximum allowable specifications of the permits.

Some permit holders may use replacements to transfer permits to a buyer, since permits cannot be bought or sold separately from a vessel. To retain a vessel, a permit holder may transfer the permit to a skiff and then sell the skiff and permit together to a third party. Some permit holders transfer their permits to a skiff to lease out their days at sea or other allocations without the expense of maintaining a vessel. Since 2007, NMFS no longer requires additional documentation of vessel size or horsepower for replacements to vessels under 17 feet (called "non-fishing skiffs") to reduce the administrative burden to NMFS and vessel owners from processing these frequent requests.

4. Vessel Baseline Data

This section uses permit and landings data to describe the vessels subject to vessel baseline restrictions, with a focus on 2025, the most recent year of complete data.

Subset of GARFO permits are subject to baselines. In the 2025 permit year, there were 5,675 vessels issued permits by GARFO and 1,838 permit suites⁶ with vessel baseline restrictions. Of those permit suites, 1,167 were issued to vessels during the year while 671 were in Confirmation of Permit History (CPH).⁷ Of the 1,167 permit suites with baselines issued to

⁶ Unless otherwise specified, "permit suites" can refer to a single permit or multiple permits grouped together as suites.

⁷ A CPH is required when a vessel that has been issued a limited access permit has sunk, been destroyed, or has been sold to another person without its permit history. Possession of a CPH will allow the applicant to maintain the landings history of the permit without owning a vessel. In this document, the 671 permits in CPH in 2025 also includes permits which were eligible to be put on vessels in 2025 but were not renewed.

vessels, 164 had multiple baselines of length, horsepower, or both, and 1,003 had one baseline length and horsepower (Figure 1).

Increases possible, more so for length than horsepower. A substantial number of permit suites could have larger vessels or more powerful engines within existing regulations. Across all relevant fisheries in 2025, most of the 1,167 vessels with baselines were at or below their baselines for length and horsepower (Table 2). Across fisheries, 62-81% of vessels are under or at their baseline length and 51-80% are under or at their baseline horsepower. Generally, under 10% of vessels in each fishery were at or above their maximum length or horsepower. Percentages tend to be higher for horsepower relative to length which makes intuitive sense, as it is typically more feasible to replace or modify an engine than an entire vessel.

Smaller, less powerful vessels are more restricted. All vessels with baselines were grouped by horsepower and length categories to illustrate how the vessels compare to their maximum allowable horsepower and length (Figures 2 and 3). The 2025 data show that shorter vessels tended to be closer to their maximum allowed length than longer vessels. Of the 1,167 vessels with baselines, 44% were in the 31 - 60 foot category, and 59% of vessels in that category were within 5 feet of their maximum allowable length (Figure 3). This contrasts with the greater than 91 foot vessels that had just 20% of vessels within 10 feet of their maximum length. Likewise with horsepower, the vessels with lower horsepower tended to be closer to their maximum than the vessels with higher horsepower. Most vessels with baselines (76%) had engines that were 800 or less in horsepower, and 73% of those were within 100 horsepower of their maximum allowable horsepower (Figure 2). Of the vessels that were over 1,200 horsepower, 13% were within 200 horsepower of their maximum.

An aging fleet. The average age of vessels across permit types subject to baselines has increased by about 20 years across the 30 years since baselines were first implemented in the mid-1990s (Figure 4). Since about 2011, this increase has been generally consistent, suggesting that few vessels have been replaced with newer vessels during that time. However, around 2000-2010, the trends in average age were flatter. Of the permit types shown in Figure 4, *Illex* squid, longfin squid, and Atlantic mackerel had the oldest average vessel ages during 2015-2025 (e.g., 40 years for *Illex* squid and 39 years for longfin squid and Atlantic mackerel in 2025), while sea scallops had the youngest average vessel ages (e.g., 34 years in 2025).

Length and horsepower variations by permit type. When considering active⁸ vessels, some permit types tended to have longer vessels and higher horsepower engines, on average, than others. For example, vessels with *Illex* squid permits had the longest average lengths in recent years (e.g., 102 feet on average in 2025) while vessels with black sea bass permits had the smallest average lengths (e.g., 53 feet on average in 2025, Table 3, Appendix II).

Stability in length and horsepower of active vessels for most permit types, though fewer active vessels. Over the past 10 years (2015-2025), average vessel length and horsepower have remained relatively stable (changes within 5%) for actively fishing vessels for most permit types with baselines, though there have been widespread declines in the number of active

⁸ "Active" in this report means landing at least one pound of the relevant species for the permit type during the specified time period.

permits (Table 3). Only monkfish had a greater than 5% increase in both average length (11%) and horsepower (9%) across this time. *Illex* squid, Atlantic herring, and Atlantic mackerel had greater than 5% decreases in average vessel length and horsepower. Atlantic herring and Atlantic mackerel had the greatest decreases in average length (both 25%) and horsepower (40% for Atlantic herring and 39% for Atlantic mackerel). The number of active permits decreased across all permit types except for *Illex* squid (127% increase, 19 permits), and red crab (no change). Monkfish and Northeast multispecies had the greatest decreases in the total number of active permits (decreases of 188 and 124 active permits, respectively).⁹

Vessels can have multiple baselines, certain fisheries more restrictive. In 2025, roughly 10% of all permit suites with baseline restrictions (permits issued to vessels and those in CPH) had either multiple length and/or horsepower restrictions in the suite (Table 4). There were 186 permit suites with multiple length baselines and 191 suites with multiple horsepower baselines. In these cases, the regulations require the most restrictive baseline to be constraining (Section 2). For these multi-baseline suites, the most restrictive permits were for scup, Northeast multispecies, black sea bass, summer flounder, and/or monkfish.

Minority of permits still on the qualifying vessel. For the permits with baselines in 2025, on average, 20% across all permit types were still on the vessel that qualified for the limited access permit, 48% were on a replacement vessel, and 29% were in CPH (Table 5). The Atlantic mackerel and Atlantic herring fisheries had the highest percentage of permits that remained on the qualifying vessel (53% and 34%, respectively).

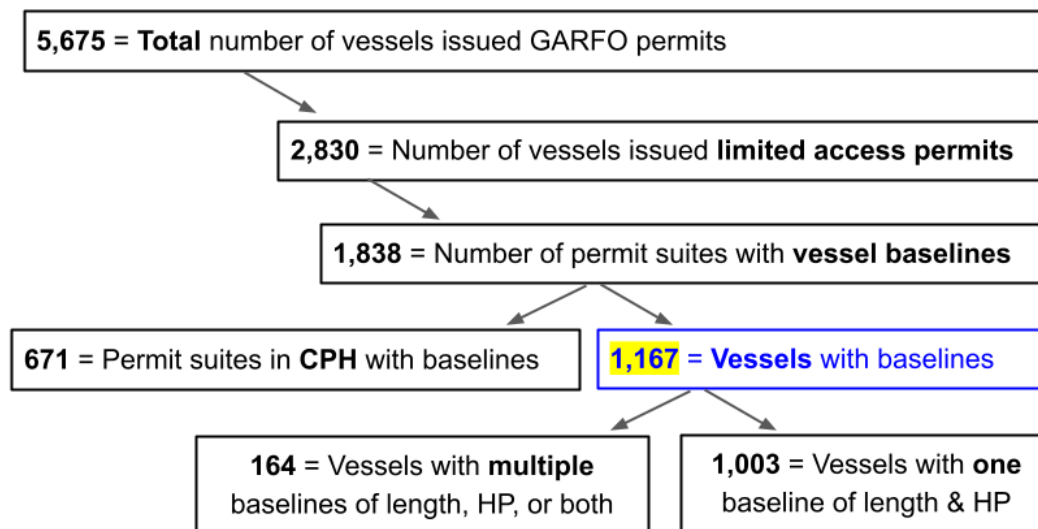


Figure 1. Categorization of permits issued by GARFO in 2025.

⁹ See Appendix III for additional data.

Table 2. Length and horsepower relative to baselines for vessels with baselines in 2025 (n=1,167) by permit type.

Permit Type	Number of vessels	% of vessels under baseline	% of vessels at baseline	% of vessels above baseline	% of vessels at maximum	% of vessels above maximum
Vessel Length						
Red Crab	5	20%	60%	20%	0%	0%
Maine Mahogany Quahog	13	31%	31%	38%	0%	0%
<i>Illex</i> Squid	67	69%	7%	19%	2%	3%
Atlantic Herring	74	51%	24%	18%	4%	3%
Atlantic Mackerel	114	39%	42%	13%	6%	0%
Butterfish	270	65%	16%	16%	2%	1%
Longfin Squid	270	65%	16%	16%	2%	1%
Sea Scallop	345	70%	10%	18%	1%	1%
Monkfish	486	67%	14%	16%	2%	1%
Scup	525	58%	19%	17%	4%	2%
Black Sea Bass	581	56%	22%	17%	3%	2%
NE Multispecies	627	56%	22%	18%	3%	1%
Summer Flounder	655	66%	15%	16%	2%	1%
Vessel Horsepower						
Red Crab	5	20%	60%	20%	0%	0%
Maine Mahogany Quahog	13	46%	15%	31%	0%	8%
<i>Illex</i> Squid	67	33%	36%	22%	6%	3%
Atlantic Herring	74	34%	38%	20%	4%	4%
Atlantic Mackerel	114	26%	50%	16%	4%	4%
Butterfish	270	29%	30%	30%	7%	4%
Longfin Squid	270	28%	30%	31%	7%	4%
Sea Scallop	345	21%	30%	34%	11%	4%
Monkfish	486	30%	31%	27%	7%	5%
Scup	525	30%	28%	30%	7%	5%
Black Sea Bass	581	30%	28%	30%	6%	6%
NE Multispecies	627	33%	29%	26%	6%	6%
Summer Flounder	655	27%	29%	31%	8%	5%

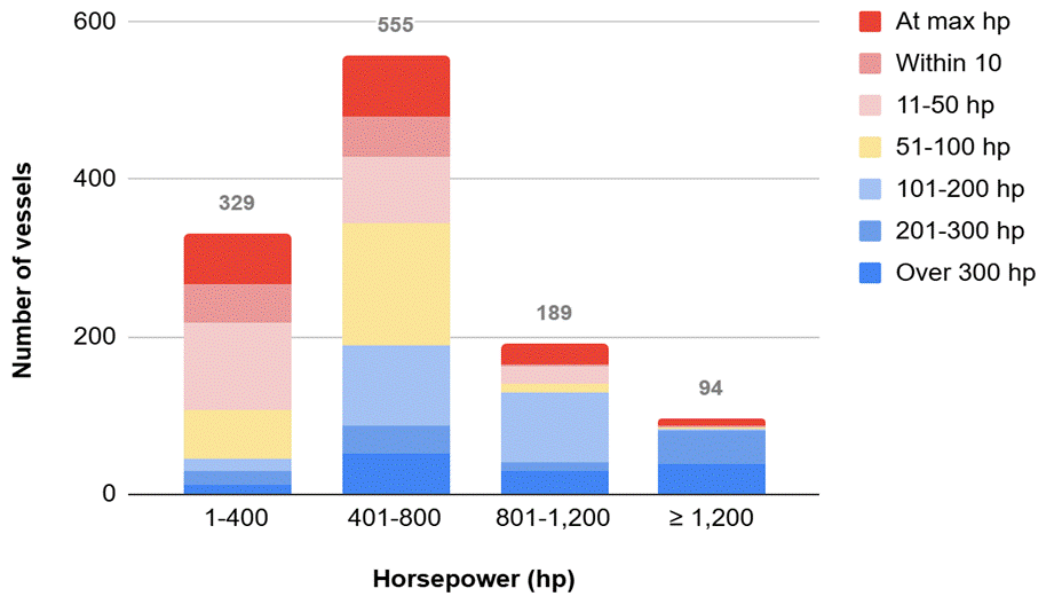


Figure 2. Horsepower of the 1,167 permit suites issued in 2025 with vessel baseline restrictions by four horsepower categories. Shading indicates how the vessels in each category compare to their maximum allowable horsepower.

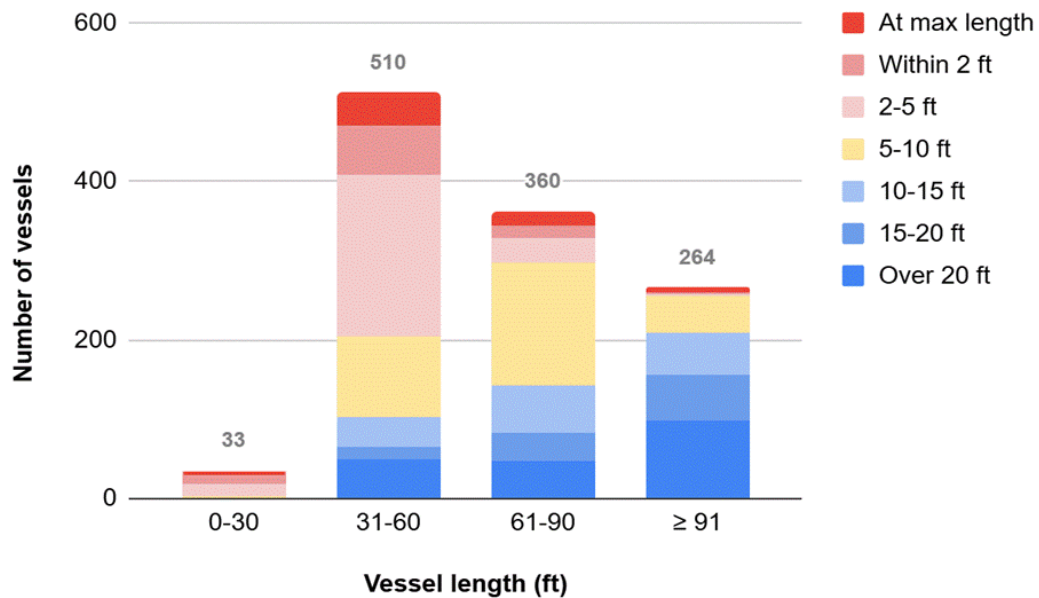


Figure 3. Length of the 1,167 permit suites issued in 2025 with vessel baseline restrictions by four length categories. Shading indicates how the vessels in each category compare to their maximum allowable length.

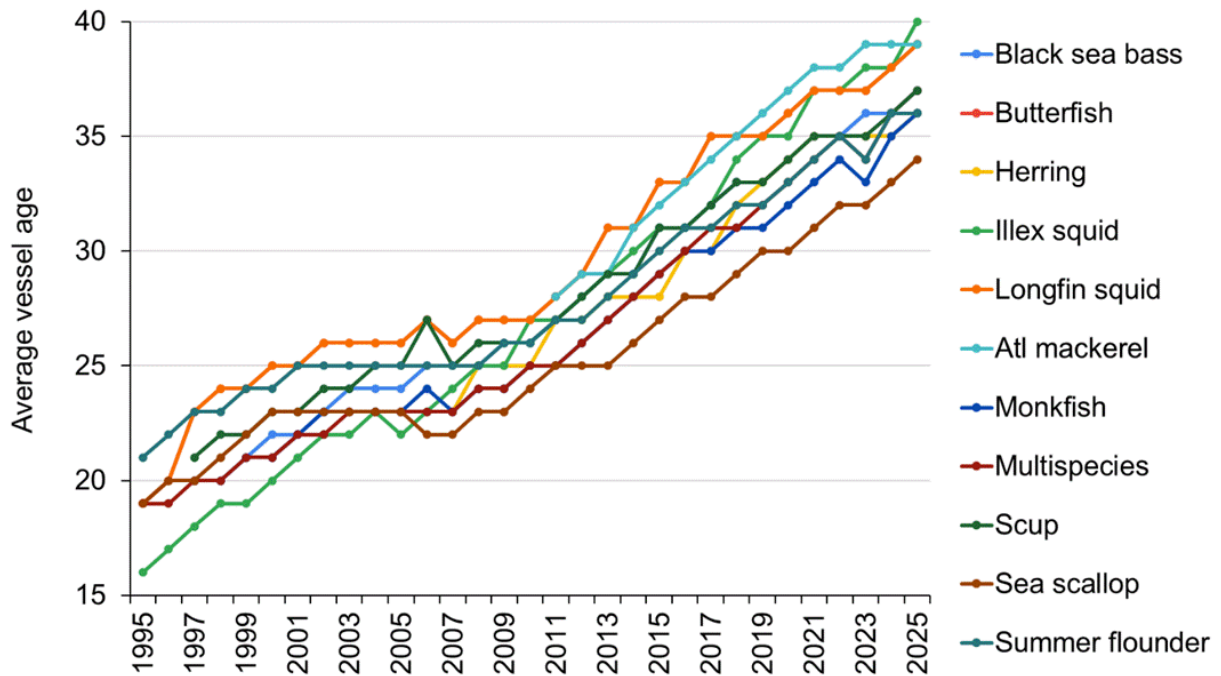


Figure 4. Average age of vessels with baselines by permit type, 1995-2025. Red crab and Maine Mahogany Quahog permits are excluded from this figure.

Table 3. Changes in average vessel characteristics and number of permits associated with actively fishing vessels with baselines, by permit type, 2015-2025.

Fishery	Average length	Average horsepower	Average age	# of active permits
Black Sea Bass	55 → 53 -4%	430 → 427 -1%	30 → 38 +27%	342 → 273 -20%
Scup	57 → 59 +4%	449 → 459 +2%	32 → 40 +25%	285 → 226 -21%
Summer Flounder	58 → 59 +2%	433 → 437 +1%	33 → 41 +24%	340 → 242 -29%
Illex Squid	114 → 102 -11%	1,443 → 1,286 -11%	27 → 36 +33%	15 → 34 +127%
Atlantic Herring	91 → 68 -25%	1,125 → 672 -40%	25 → 41 +64%	38 → 20 -47%
Butterfish	63 → 62 -2%	524 → 487 -7%	33 → 42 +27%	150 → 129 -14%
Monkfish	57 → 63 +11%	481 → 526 +9%	28 → 38 +36%	428 → 240 -44%
Northeast Multispecies	66 → 69 +5%	569 → 573 +1%	30 → 40 +33%	296 → 172 -42%
Red Crab	88 → 90 +2%	553 → 567 +3%	33 → 44 +33%	3 → 3 0%
Longfin Squid	63 → 64 +2%	531 → 538 +1%	33 → 41 +24%	181 → 150 -17%
Sea Scallop	78 → 79 +1%	742 → 754 +2%	27 → 34 +26%	331 → 330 -0.3%
Atlantic Mackerel	81 → 61 -25%	846 → 513 -39%	30 → 37 +23%	72 → 55 -24%

Note: Arrows indicate change from 2015 value to 2025 value, with percent change shown beneath. Colors indicate the magnitude and direction of change: gray is a less than 5% change in either direction; light orange/blue is 5–15% change; and dark orange/blue is a greater than 15% change. Orange indicates decreases and blue indicates increases.

Table 4. Count of permit suites with multiple baselines in 2025 (including permits in CPH and issued to vessels).

Fishery	Multiple Vessel Length Baselines (total = 186 suites)			Multiple Horsepower Baselines (total = 191 suites)		
	In CPH	On Vessels	Total	In CPH	On Vessels	Total
<i>Illex</i> Squid	0	7	7	1	10	11
Atlantic Herring	5	12	17	1	13	14
Sea Scallop	0	21	21	0	27	27
Butterfish	5	32	37	11	41	52
Longfin Squid	5	34	39	11	41	52
Atlantic Mackerel	7	36	43	3	19	22
Scup	9	41	50	17	57	74
NE Multispecies	15	36	51	30	55	85
Black Sea Bass	8	45	53	15	60	75
Summer Flounder	7	48	55	17	60	77
Monkfish	13	46	59	14	46	60

Table 5. Count of 2025 permits with baselines by fishery and percent of permits on the original qualifying vessel, have gone through at least one replacement, or in CPH.

Fishery	Permits on the qualifying vessel	Permits on a replacement vessel	Permits in CPH	Total
Red Crab	20%	80%	0%	5
Mahogany Quahog	12%	46%	42%	26
<i>Illex</i> Squid	33%	55%	12%	76
Atlantic Herring	34%	42%	24%	97
Atlantic Mackerel	53%	25%	22%	146
Butterfish	22%	51%	27%	371
Longfin Squid	22%	51%	27%	371
Sea Scallop	26%	74%	1%	347
Monkfish	20%	47%	33%	724
Scup	19%	51%	30%	745
Black Sea Bass	22%	54%	24%	767
NE Multispecies	17%	38%	45%	1,149
Summer Flounder	21%	52%	27%	900
Total	20%	48%	29%	5,724

5. Input from Advisory Panels and Public

In May 2026, the Councils held three joint public webinar meetings for all Advisory Panels and an associated written comment period to solicit input on the vessel baseline restrictions. This input is summarized below and in more detail in the public comment summary.¹⁰

Many commenters emphasized that the **considerations vary greatly by fishery, vessel size, and gear type** and there is **no one size fits all solution**.

For example, **safety at sea** was especially of concern for smaller vessels and lower horsepower engines. Commenters noted that larger vessels and higher horsepower engines can operate more safely further offshore and in different conditions and can more quickly return to port when needed. The baseline restrictions constrain some vessels to smaller sizes and lower horsepower engines, which limits the ability to upgrade for safety reasons. Some commenters said this has become more of an issue as some fisheries have moved further offshore compared to when the vessel baseline restrictions were first established. A few commenters noted that multiple lives have been lost because of challenges like this.

Commenters noted it is **challenging and costly to replace or modify vessels and engines** under the baseline restrictions. Several comments described how modern engines are very different from when the baseline restrictions were first established. This often requires modifying engines in ways that can negatively impact their performance to comply with the baseline restrictions. Commenters also described challenges with finding suitable replacement vessels, which is costly in general due to limited commercial fishery ship building in the U.S., and is exacerbated by the constraints imposed by vessel baselines.

Commenters noted that **relinquishing permits** is sometimes necessary to replace vessels. Vessels can have permits in multiple different fisheries. This can include a mix of permits that are subject to baseline restrictions and permits that are not. In cases when a vessel has multiple permits subject to baselines and those permits were previously associated with multiple different vessels and therefore have different baseline specifications, the most restrictive baseline applies. The **regulations prohibit permit splitting** for limited access permits ([50 CFR 648.4\(a\)](#)), meaning once permits are grouped together on a vessel, they cannot be split among different vessels in the future. For these reasons, permit holders will sometimes relinquish a permit with a more restrictive baseline to gain the flexibility to increase their vessel size or engine horsepower. However, in other cases, permit holders may determine it is worthwhile to retain a restrictive permit and continue fishing on a smaller vessel or lower horsepower engine than they would prefer.

Commenters described **administrative challenges** of complying with the baseline restrictions. For example, it can be costly to hire a vessel surveyor or naval architect to confirm the specifications of a vessel. In addition, a vessel's length and horsepower may not always be documented correctly, which can pose challenges when the corrected specifications do not match the relevant permits.

¹⁰ Available at <https://www.nefmc.org/library/vessel-baselines-restrictions-evaluation>

Commenters who described challenges associated with vessel baselines did not always oppose maintaining these restrictions in some form, at least for some fisheries or gear types. Several commenters described benefits of the baseline restrictions. For example, the **baseline restrictions impact the value of permits**. Permits with larger baselines have a higher value. These permits can represent a substantial investment and can be an important component of retirement planning for some fishermen. Some commenters were concerned that if the baseline restrictions were eliminated, this would devalue some permits and negatively impact permit holders who have made substantial investments. Conversely, permits with smaller baselines are more affordable, which is beneficial for people looking to get into the fisheries. With time, individuals fishing on permits with lower baselines can ideally save enough money to later invest in a permit with larger baselines.

Some commenters also thought the vessel baseline restrictions continue to play a role in **conservation** and **prevention of overcapitalization** in some fisheries, particularly the sea scallop and squid fisheries. Some commenters were concerned that without the baseline restrictions, catch rates in some fisheries would increase too much or there could be too much fleet consolidation. However, other fisheries are more constrained by other measures such as possession limits and would not be impacted to the same extent if the baseline restrictions were removed. In addition, several commenters noted that the vessel baseline restrictions have less of an impact on fishing operations for fixed gear compared to mobile gear. For example, increased horsepower would allow trawl or dredge fisheries to fish harder and faster, but it would not have the same impact on pot/trap or gillnet fisheries.

6. Considerations for Changing Vessel Baseline Restrictions

If the Councils agree to initiate a management action to consider potential revisions to the vessel baseline restrictions, several considerations should be kept in mind and further evaluated.

One of many tools. An original goal of vessel baseline restrictions was to limit catch and preserve fleet diversity (Section 1). However, several major changes in fisheries management have since occurred that also achieve this purpose. Since the 2007 reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act, annual catch limits (ACLs) and accountability measures (AMs) have become the primary tool for limiting fish removals, and thus, baseline restrictions may be less needed today for achieving the biological objectives of fisheries management. The data in this report indicate that vessel size and horsepower diversity exists across the fisheries generally. The vessel baseline restrictions have likely been impactful to this end, but the Councils should consider that fisheries have many other management measures such as possession limits, spatial and/or seasonal management, gear restrictions, and allocations (among seasons, sectors and/or states) that promote diversity within and among fisheries. Should a vessel baseline action be initiated, the Councils should identify if these original goals are still relevant and what other tools are in place to achieve them.

Minimize administrative burden. The administration of varying baseline restrictions across fisheries led the Councils to take prior actions to harmonize the requirements across the relevant fisheries (Appendix I). While there has been some interest identified through this

evaluation process in loosening restrictions for specific fisheries, vessels, or gear types, care should be taken to ensure that such a change would not increase administrative complication, which would ultimately add burden to fisheries and GARFO. For example, entirely removing baseline restrictions from some permit types may not increase the administrative burden. Changing the current 10% and 20% percentage caps for length and horsepower in a consistent manner across all relevant permit types would also likely not notably increase the administrative burden. However, applying different percentage maximums to different permit types, or other differences across permits, would likely increase the challenges of administering the baseline restrictions.

Omnibus approach needed. Given that many permit suites include permits for fisheries managed by both Councils, a joint omnibus action would likely be needed to consider modifications to vessel baseline regulations. For example, in 2025, of the 1,227 unique vessels with at least one permit with a baseline, 66% included permits for fisheries managed by both Councils (e.g., Atlantic mackerel and Atlantic herring permits), and just 17% of permits suites had MAFMC-only permits and 17% had NEFMC-only permits. This distribution has been similar since at least 2015. Vessel baselines is a complex topic, including different impacts by fishery, vessel size, and gear type, so it may be most appropriate to consider potential revisions through a joint omnibus FMP amendment rather than a framework adjustment, depending on the alternatives developed.

7. Recommendation and Next Steps

Based on this evaluation, Council staff recommend the Councils prioritize a joint management action to consider potential revisions to the vessel baseline restrictions.

The evaluation process, including the comments received from Advisory Panels and the public, highlighted administrative and logistical challenges related to the current regulations that can vary across fisheries and vessels. The process also raised ideas for potential solutions that could be considered further, though notably some commenters were hesitant to support modifications. These issues can be more fully considered through the deliberative, public process of a Council action.

If the Councils prioritize development of a management action in 2027, a Fishery Management Action Team (FMAT) with a wide array of relevant expertise would be formed to assist Council staff in development of management alternatives and analysis of impacts. The FMAT should expand upon the expertise of the work group to also include social science/economic expertise, input from the U.S. Coast Guard, and other relevant expertise.

A future action would consider a variety of management alternatives, including a no action alternative. Specific alternatives would be developed in more detail after a public scoping period and additional analysis by an FMAT. The impacts of modifying/removing vessel baseline restrictions would be further evaluated through this action.

8. List of Preparers

The following personnel participated in preparing this document:

- **MAFMC.** Julia Beaty, Hayden Dubniczki
- **NEFMC.** Rachel Feeney
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APPENDIX I. History of Vessel Baseline Restrictions

Early restrictions. The first restrictions on increases in vessel length for Mid-Atlantic or New England Council managed species were implemented for the surfclam and ocean quahog fisheries in the late 1970s. These restrictions were later rescinded when the fisheries became managed with individual transferable quotas. In 1994, baseline restrictions for vessel length, horsepower and tonnage were implemented in the Northeast multispecies and sea scallop fisheries when their limited access programs were created. Other limited access fisheries soon followed with similar restrictions, though the regulations varied across fisheries. By 1997, there were four different sets of restrictions that could apply to a single vessel, depending on the permits in its permit suite. This resulted in compliance and administration challenges as well as safety concerns.¹¹

1999 Omnibus Consistency Amendment. To address the challenges with having varying regulations, the Councils collaborated on the [Omnibus Consistency Amendment](#), which was implemented in 1999 and standardized the definitions and restrictions for vessel baselines, upgrades, and replacements across all limited access fisheries managed by both Councils ([64 FR 8263](#)). This amendment aimed to reduce complications for sales, transfers, and upgrades of vessels holding multiple limited access permits, while maintaining controls on fishing effort. It simplified regulations for vessel replacements, permit transfers, and vessel upgrades, making them consistent and, in some cases, less restrictive. Limited access programs adopted after this amendment (i.e., monkfish, Atlantic herring, and Atlantic mackerel) used these same requirements. This amendment also implemented the restriction on permit splitting, meaning that once permits are placed together on the same vessel, they are then treated as a permit suite that must stay together.

Following the Omnibus Consistency Amendment, all relevant limited access permits were allowed a one-time up to 10% increase in vessel size (based on length overall, gross registered tons, or net tons) and a one-time up to 20% increase in horsepower through a vessel or engine modification or replacement. For permits which already had these requirements (i.e., Northeast multispecies and sea scallops), the baseline against which these one-time increases were measured remained the vessel that originally obtained the limited access permit. For permits for which these restrictions were a change from the previous requirements, (i.e., summer flounder, scup, black sea bass, longfin squid, *Illex* squid, butterfish, and Maine mahogany quahogs) the baseline became the effective date of the Omnibus Consistency Amendment (i.e., March 22, 1999).

2007 Magnuson-Stevens Reauthorization Act. The Reauthorization Act mandated that councils set annual catch limits (ACLs) and accountability measures (AMs). In addition, the act promoted market-based management strategies, including catch shares, limited access privilege programs, and individual fishery quotas. Thus, both Councils set ACLs and AMs for virtually all stocks¹² and developed catch share programs in several FMPs. This shift from input-

¹¹ A more detailed summary of the history of the initial vessel baseline restrictions is included in Section 2.1 of the [1999 Omnibus Consistency Amendment](#).

¹² Longfin and *Illex* squid are exempt from the requirements for ACLs given their short life cycles.

based measures (e.g., effort controls such as days at sea, vessel capacity restrictions) to more output-based measures (e.g., ACLs, individual quotas) reduced the need for vessel baselines as a conservation measure because all stocks now had hard annual catch caps.

2015 Omnibus Vessel Baseline Amendment. Some challenges remained after implementation of the Omnibus Consistency Amendment. Therefore, GARFO and the Councils developed the Omnibus Vessel Baselines Amendment to consider how to further simplify and streamline the administration of vessel baselines, upgrades, and replacements for vessel owners and NMFS, while maintaining the function they provide for preserving fleet diversity and limiting capacity. To achieve this goal, this amendment, which was implemented in 2015, eliminated tonnages from the vessel baseline restrictions and eliminated the one time limit on increases in vessel length and horsepower ([80 FR 51754](#)).

Eliminating tonnages simplified the specifications defining the baselines. The Councils and NMFS agreed that tonnages were the most variable of the baseline specifications and had a lesser impact on limiting capacity than the restrictions on length and horsepower. Eliminating the tonnage baselines also eliminated the need for some permit holders to get a marine survey to verify their baselines (see Section 3).

Eliminating the one-time allowable increase in vessel size and horsepower allowed permit holders the flexibility to make multiple incremental increases without losing their ability to make additional future changes, if none of the changes increased beyond 10% of the length and 20% of the horsepower of the baseline specifications. This also reduced the administrative burden on NMFS, because the agency was no longer required to confirm if an increase had already occurred if the modified or replaced vessel was within 10% of the length or 20% of the horsepower of the baseline specifications.

APPENDIX II. Additional Data on Vessel Characteristics in 2025

Table 6. Vessel characteristics and number of permits associated with all vessels with baselines, all and active vessels, in 2025, by permit type.

Permit Type	Average length		Average horsepower		Average age		# of permits	
	All	Active	All	Active	All	Active	All	Active
All vessels with baselines								
Black Sea Bass	55	53	475	427	37	38	606	273
Scup	57	59	480	459	37	40	552	226
Summer Flounder	65	59	571	437	36	41	681	242
<i>Illex</i> squid	84	102	867	1286	40	36	67	34
Atlantic Herring	77	68	836	672	36	41	77	20
Butterfish	68	62	589	487	39	42	280	129
Monkfish	63	63	599	526	36	38	503	240
NE Multispecies	49	69	411	573	37	40	663	172
Red Crab	88	90	632	567	46	44	5	3
Longfin Squid	68	64	589	538	39	41	280	150
Sea Scallop	80	79	765	754	34	34	347	330
Atlantic Mackerel	75	61	733	513	39	37	121	55
Subset of vessels with more than one permit with baselines								
Black Sea Bass	57	54	490	428	37	38	545	243
Scup	57	59	478	460	37	40	548	225
Summer Flounder	65	59	576	438	36	41	664	239
<i>Illex</i> squid	84	102	867	1,286	40	36	67	34
Atlantic Herring	78	68	851	680	36	41	73	18
Butterfish	68	62	589	487	39	42	280	129
Monkfish	64	63	606	527	36	38	485	233
NE Multispecies	53	71	445	601	37	40	495	146
Red Crab	87	87	525	525	42	42	1	1
Longfin Squid	68	64	589	538	39	41	280	150
Sea Scallop	80	80	773	765	34	35	324	310
Atlantic Mackerel	75	61	733	513	39	37	121	55

APPENDIX III. Additional Data on Vessel Characteristics Over Time (2015-2025)

Table 7. Changes in average vessel characteristics and number of permits associated with all vessels with baselines, by permit type, 2015-2025.

Permit Type	Average length	Average horsepower	Average age	# of permits
Black Sea Bass	53 → 55 +4%	451 → 475 +5%	31 → 37 +19%	693 → 606 -13%
Scup	54 → 57 +6%	449 → 480 +7%	31 → 37 +19%	646 → 552 -15%
Summer Flounder	62 → 65 +5%	534 → 571 +7%	30 → 36 +20%	779 → 681 -13%
Illex squid	82 → 84 +2%	823 → 867 +5%	31 → 40 +29%	67 → 67 0%
Atlantic Herring	79 → 77 -3%	876 → 836 -5%	28 → 36 +29%	88 → 77 -13%
Butterfish	67 → 68 +2%	559 → 589 +5%	33 → 39 +18%	296 → 280 -5%
Monkfish	60 → 63 +5%	544 → 599 +10%	29 → 36 +24%	593 → 503 -15%
Northeast Multispecies	45 → 49 +9%	372 → 411 +11%	29 → 37 +28%	876 → 663 -24%
Red Crab	72 → 88 +22%	506 → 632 +25%	36 → 46 +28%	5 → 5 0%
Longfin Squid	67 → 68 +2%	559 → 589 +5%	33 → 39 +18%	296 → 280 -5%
Sea Scallop	79 → 80 +1%	753 → 765 +2%	27 → 34 +26%	337 → 347 +3%
Atlantic Mackerel	75 → 75 0%	749 → 733 -2%	32 → 39 +22%	142 → 121 -15%
<i>Notes:</i> Arrows indicate change from 2015 value to 2025 value, with percent change shown beneath. Colors indicate the magnitude and direction of change: gray is a less than 5% change in either direction; light orange/blue is 5–15% change; and dark orange/blue is a greater than 15% change. Orange indicates decreases and blue indicates increases.				

Table 8. Changes in average vessel characteristics and number of permits associated with all active vessels with more than one permit with baselines, by permit type, 2015-2025.

Permit Type	Average length	Average horsepower	Average age	# of permits
Black Sea Bass	57 → 54 -5%	440 → 428 -3%	31 → 38 +23%	308 → 243 -21%
Scup	57 → 59 +4%	451 → 460 +2%	32 → 40 +25%	283 → 225 -21%
Summer Flounder	58 → 59 +2%	435 → 438 +1%	33 → 41 +24%	331 → 239 -28%
Illex squid	114 → 102 -11%	1443 → 1286 -11%	27 → 36 +33%	15 → 34 +127%
Atlantic Herring	97 → 68 -30%	1274 → 680 -47%	25 → 41 +64%	35 → 18 -49%
Butterfish	63 → 62 -2%	524 → 487 -7%	33 → 42 +27%	150 → 129 -14%
Monkfish	58 → 63 +9%	485 → 527 +9%	28 → 38 +36%	409 → 233 -43%
Northeast Multispecies	68 → 71 +4%	593 → 601 +1%	31 → 40 +29%	264 → 146 -45%
Red Crab	93 → 87 -7%	610 → 525 -14%	36 → 42 +17%	1 → 1 0%
Longfin Squid	63 → 64 +2%	531 → 538 +1%	33 → 41 +24%	181 → 150 -17%
Sea Scallop	79 → 80 +1%	747 → 765 +2%	27 → 35 +30%	310 → 310 0%
Atlantic Mackerel	81 → 61 -25%	846 → 513 -39%	30 → 37 +23%	72 → 55 -24%

Notes: Arrows indicate change from 2015 value to 2025 value, with percent change shown beneath. Colors indicate the magnitude and direction of change: gray is a less than 5% change in either direction; light orange/blue is 5–15% change; and dark orange/blue is a greater than 15% change. Orange indicates decreases and blue indicates increases.

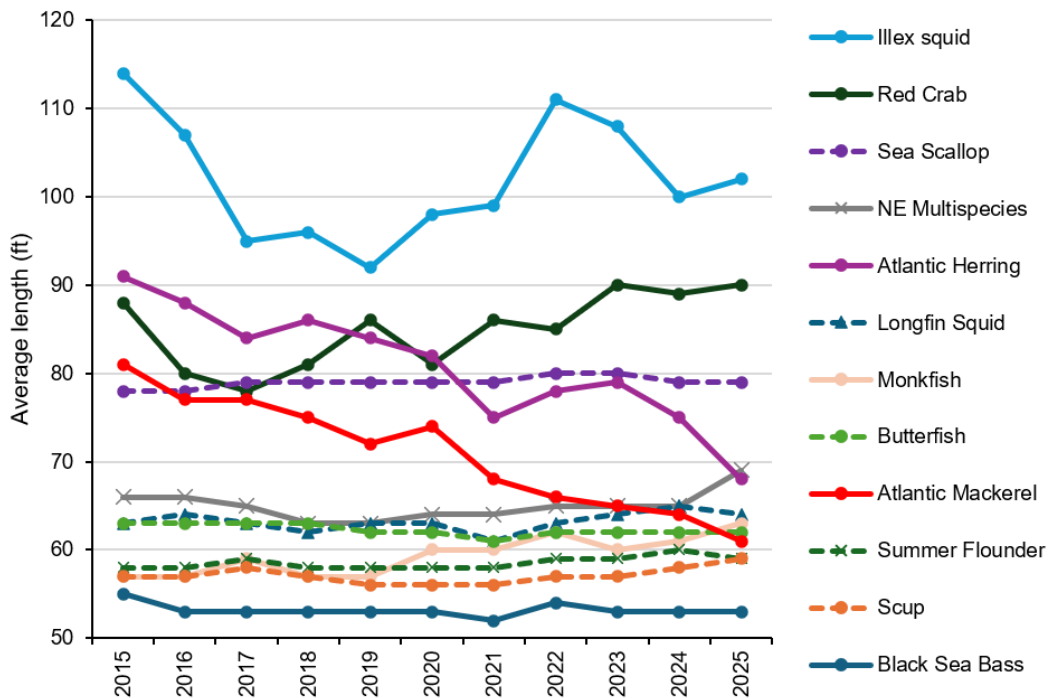


Figure 5. Average length by permit type for active vessels with baselines, 2015-2025.

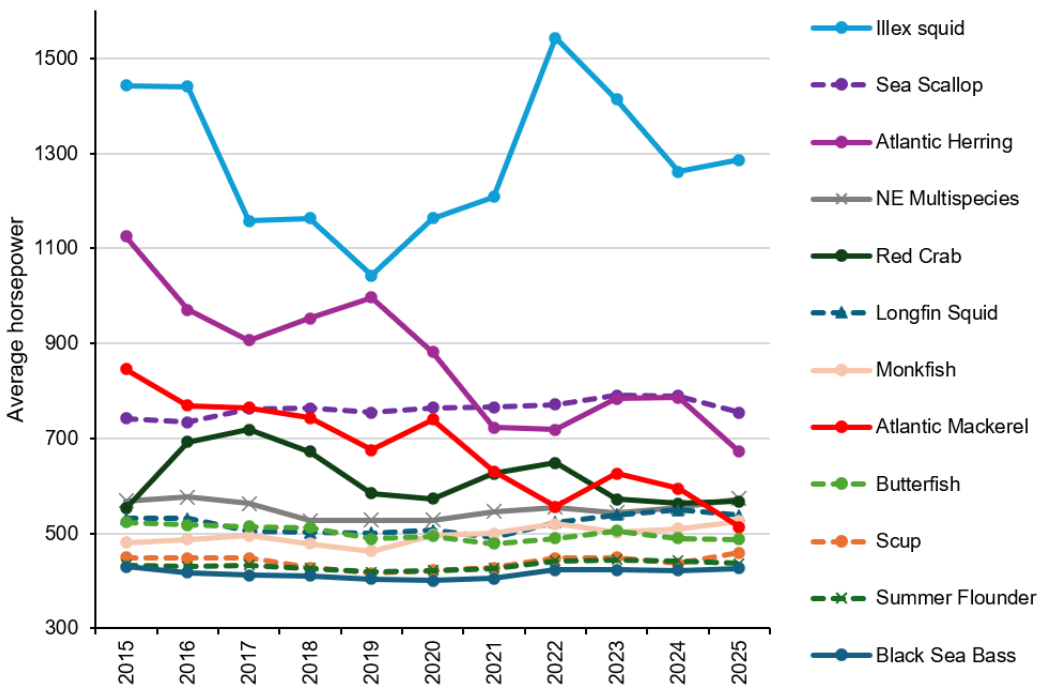


Figure 6. Average horsepower by permit type for active vessels with baselines, 2015-2025.

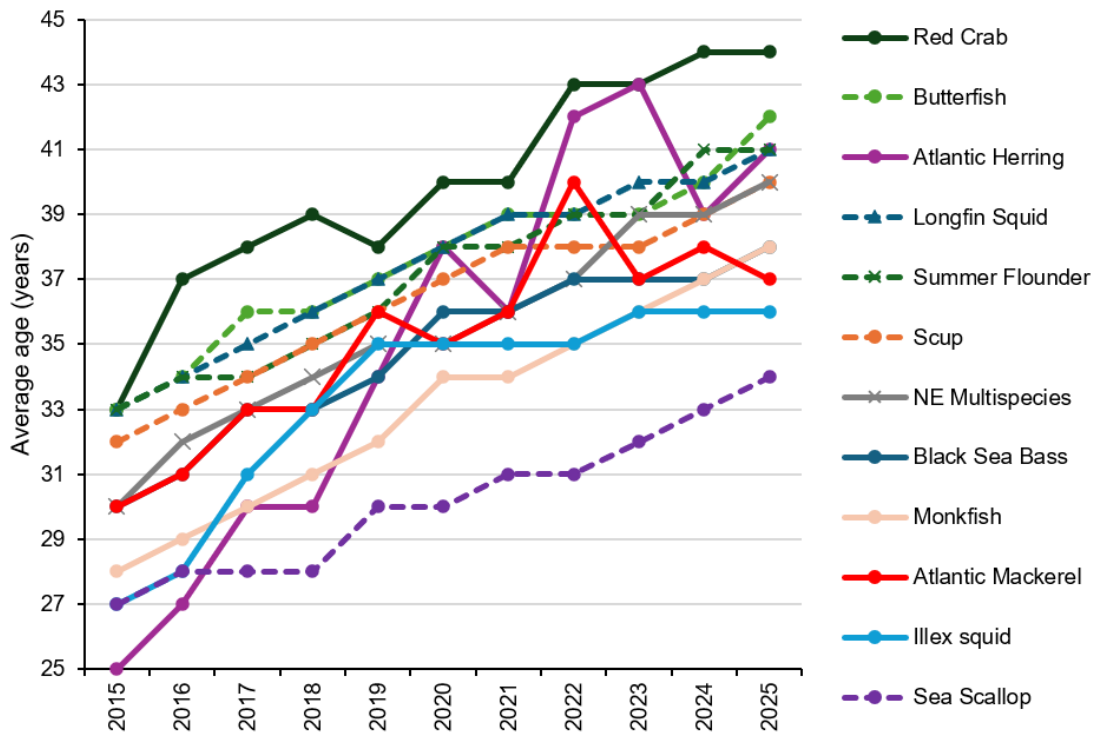


Figure 7. Average age by permit type for active vessels with baselines, 2015-2025.

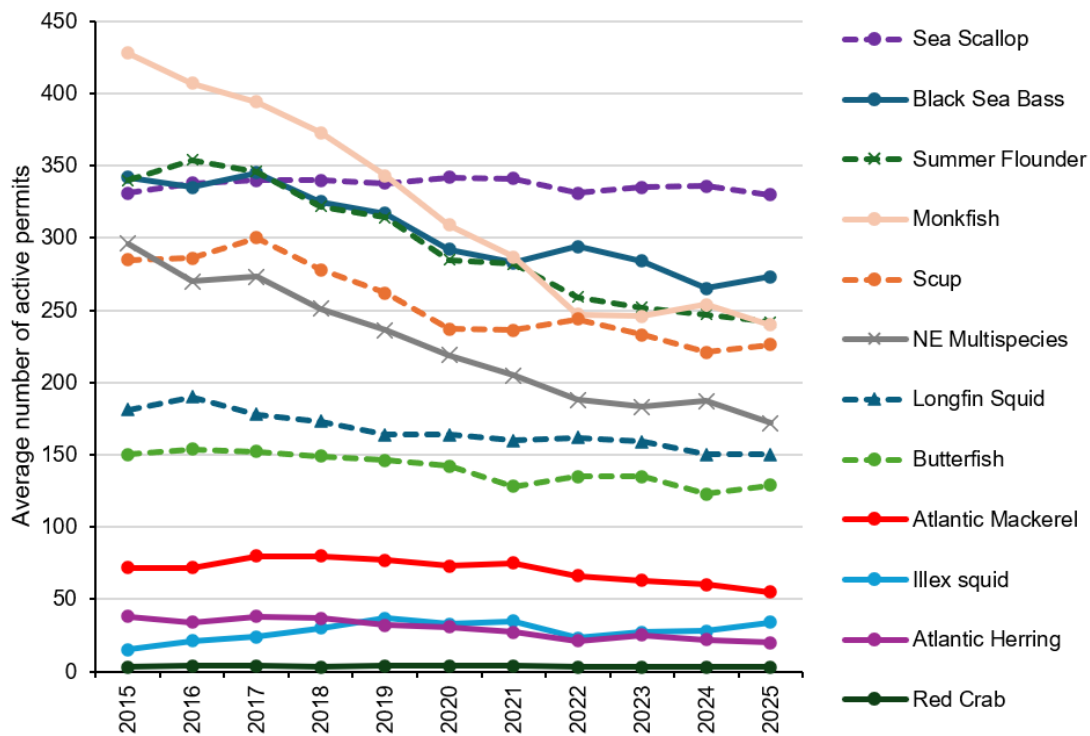


Figure 8. Number of active permits by permit type, 2015-2025.