

# Scallop Framework 42 Discussion Document

## Scallop PDT Meeting Draft

August 27, 2026

### *Background*

Development of regional Limited Access Day-at-Sea (DAS) allocations, including consideration of DAS carryover provisions, and the Northern Gulf of Maine (NGOM) sub-management areas were approved by the Council for development in 2026 to be included in Framework 42. In June, the Council voted to develop a separate action to set specifications for FY 2027 and FY 2028 (default).

To address these priorities, the Scallop PDT convened on February 26, April 7, July 29, and August 17 to develop draft options and relevant analyses. The Scallop AP and Committee provided guidance and additional tasking to the Scallop PDT at their recent meetings on June 2 & 3, respectively ([AP meeting summary](#); [Committee meeting summary](#)). The Scallop AP will meet jointly with the PDT on September 9<sup>th</sup> and the Committee will meet on September 10<sup>th</sup> to discuss both FW42 and the specifications actions.

### **Regional Limited Access DAS allocations**

Under the current fishery management plan, Limited Access DAS can be used anywhere in the open bottom.

Enabling the Council to allocate DAS separately between the Mid-Atlantic and Georges Bank/South Channel, delineated by the 71°W boundary, would allow for more regionalized management of Mid-Atlantic and Georges Bank scallops which are experiencing different patterns of natural and fishing mortality as well as other life history processes (e.g., growth; [Scallop Research Track Peer Review Report](#)).

The main purpose of developing regional DAS allocations is to enable the Council to constrain open-bottom fishing effort in years where landings per unit effort (LPUE) in one region is substantially higher than the other, increasing the risk of regional overharvest. Since 2021, the fleet has focused their effort on Georges Bank (Table 1, Figure 1), and in 2023, overfishing occurred on Georges Bank ([August 19, 2025 Scallop PDT Memo to the SSC](#)).

Regional DAS allocations could also offer an opportunity to use in-season adjustment authority. A Proposed Rule for the [Omnibus Management Flexibility Amendment](#) was published on May 14, 2026, which would enable in-season adjustments to the Council's fisheries, including in the Scallop Fishery Management Plan. Dynamic adjustments to DAS allocations that redistribute, increase, or decrease total open-bottom effort could make the scallop fishery more resilient when observed scallop yields diverge from projections (e.g. predators, marine heatwave).

**PDT input:** The Scallop PDT recognized the benefits of regional management of the open-bottom but cautioned against excessive management complexity that could further strain administration, monitoring, enforcement, and the flexibility of vessels to target scallop beds with higher catch rates. The PDT was supportive of DAS-trading between Limited Access vessels to allow for vessel flexibility. GARFO staff have commented that there is capacity to support monitoring and accounting of regional DAS management but shared that trading of DAS

between regions could not be supported for implementation in FY 2027 due to ongoing work to rebuild the Allocation Management System (AMS). However, GARFO staff have shared that this would be viable for implementation in FY 2028.

**PDT Goal:** provide recommendations to the AP and Committee for their consideration during their September 9<sup>th</sup> and 10<sup>th</sup> meetings

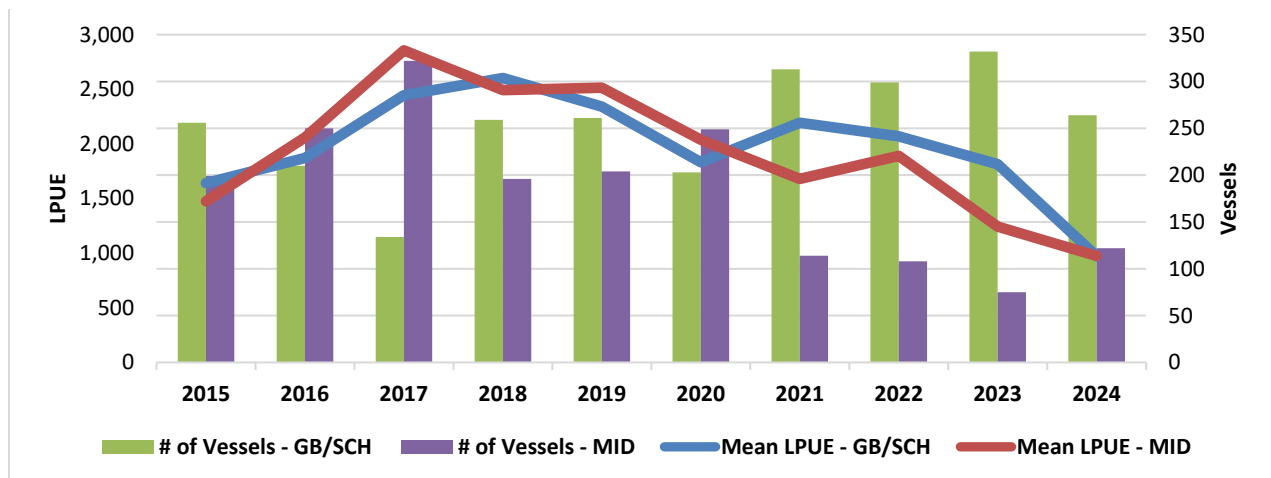
Scallop AP Recommendations: The AP was divided on the benefits of regional DAS allocations relative to the reduced vessel operational flexibility. While several AP members did not support further development, others preferred to continue development for implementation in FY2028 when support for trading of DAS between vessels and regions would be available. Some members of the AP and industry also recommended: evaluating alternatives to understand fleet responses, a simple approach to any Regional DAS program, reconsidering the approach once stock projection methods are complete, and implementing the tool in the future if conditions warrant its use. The AP unanimously did not support reductions in the number of DAS that could be carried over between fishing years. The AP also did not support development of alternatives for differential DAS counting.

Scallop Committee Recommendations: The Committee recommended continued development of these measures to allocate region-specific DAS for Concept 1 while delaying implementation until necessary administrative/trading mechanisms are available. The Committee did not recommend differential DAS counting (specifying a ratio to adjust DAS charges to increase or decrease realized effort in a region) and did not support reducing DAS carryover. Limited Access vessels would be allocated Mid-Atlantic and Georges Bank DAS, delineated by the 71°W boundary line. The number of DAS set in each region would be limited so that the overall open area fishing mortality rate could not exceed  $F_{MSY} = 0.49$ , however the regional fishing mortality reference points ( $F_{MSY\ GB} = 0.36$ ,  $F_{MSY\ MA} = 1.56$ ) could be considered, and so that the combined fishing mortality rate for access and open areas combined is at or below the  $F_{ACT}$ . The Committee did not support development of alternatives for differential DAS counting.

Table 1. Limited Access scallop vessel effort (in VMS hours fished) by region, FY2021 – FY2025 (April – July).

| Region                                  | FY2021         | FY2022        | FY2023         | FY2024         | FY2025 (Apr-Jul) |
|-----------------------------------------|----------------|---------------|----------------|----------------|------------------|
| GB – Open                               | 90,769 (85%)   | 30,462 (64%)  | 73,079 (70%)   | 112,464 (78%)  | 38,246 (62%)     |
| MAB – Open                              | 16,037 (15%)   | 17,182 (36%)  | 7,069 (30%)    | 31,240 (22%)   | 23,347 (38%)     |
| <b>Total - Open</b>                     | <b>106,806</b> | <b>47,644</b> | <b>80,148</b>  | <b>143,704</b> | <b>62,492</b>    |
| GB – Access                             | 60,386 (45%)   | 37,375        | 37,544         | 59,963 (55%)   | 44,944           |
| MAB– Access                             | 74,356 (55%)   | 0             | 0              | 49,813 (45%)   | 0                |
| <b>Total – Access</b>                   | <b>134,742</b> | <b>37,375</b> | <b>37,544</b>  | <b>109,776</b> | <b>44,944</b>    |
| GB – Total                              | 151,155 (63%)  | 67,837 (80%)  | 110,633 (77%)  | 172,427 (68%)  | 83,190 (78%)     |
| MAB - Total                             | 90,393 (37%)   | 17,182 (20%)  | 7,069 (23%)    | 81,053 (32%)   | 23,347 (22%)     |
| <b>Grand Total</b>                      | <b>241,548</b> | <b>85,019</b> | <b>117,702</b> | <b>253,480</b> | <b>106,537</b>   |
| <i>Data: CAMS, accessed August 2025</i> |                |               |                |                |                  |

Figure 1. LPUE and active scallop vessels between the Mid-Atlantic (MA) and Georges Bank (GB)/South Channel (SCH), FY2015 – 2024.



### *Development of a Regional DAS Program*

Framework 42 needs to include specific details on how a Regional DAS program would work so that NOAA Fisheries can develop the necessary program and accounting before possible implementation beginning in FY 2028.

### **The PDT should weigh in on the following:**

#### 1. DAS Trading

Trading of regional DAS is being considered as a way of allowing additional vessel operational flexibility. Staff are looking for PDT input to refine the following options and ensure the full range of pros, cons, risks, and tradeoffs are considered.

#### *Trading increments and limits*

- **Option 1:** Vessels must exchange DAS in equal increments, with fractional values permitted
- **Option 2:** Vessels can design individual trades with other vessels (e.g., 3 MA DAS for 1 GB DAS), but the exchange ratio may not exceed 3 DAS in one region for 1 DAS in another (e.g.)
- **Option 3:** Vessels can design individual trades with other vessels (e.g., 3 MA DAS for 1 GB DAS), with no restriction on the magnitude of the trade.
  - o This would essentially allow stacking if done between vessels without any restrictions.
  - o Trading 3 DAS on a smaller vessel for 1 DAS on a larger vessel would be an efficiency gain.

#### *DAS trade cap*

- **Option 1:** There would be no cap on the proportion of a vessel's DAS that could be exchanged (e.g. a vessel could exchange all of their MA DAS for GB DAS)
- **Option 2:** Vessel DAS trades would be capped at exchanging up to 50% (e.g.) of their DAS allocation.
  - o Capping DAS exchanges could be considered to prevent 'stacking' if vessels are able to trade DAS in unequal amounts. If vessels can only trade DAS in equal amounts, likely not needed.

### *Timing of DAS trading*

- **Option 1:** Trading could only occur pre-season.
  - o This would likely negatively affect the flexibility of a DAS program, limiting vessel's ability to respond to changing conditions.
- **Option 2:** Trading in-season would be permitted, similar to access area trips via FishOnline.
  - o GARFO staff have confirmed programmatic support for in-season trading.

### ***Other considerations:***

- How would the different option affect competition for DAS in the region with higher projected LPUE? Could this lead to equity issues?
- With no cap on the maximum ratio of DAS exchanged, would this lead to unconstrained consolidation?
- How should DAS trading be developed to mitigate overallocated DAS in a given region with when realized LPUE is below the projected value used to set DAS specifications?

### ***2. DAS Carryover***

Current scallop regulations enable Limited Access vessels to carry over up to 10 DAS into the subsequent fishing year. If DAS are allocated regionally, a vessel's remaining DAS could be carried over, subject to the existing 10-DAS carryover limit, and used in the subsequent fishing year. Previous analysis of carryover used by Limited Access vessels from FY 2011-2022 suggests that Limited Access vessels carry over 5 DAS on average each fishing year.

- **Option 1: Proportional Split** - A Limited Access vessel's remaining open-bottom DAS would be apportioned using the ratio of Mid-Atlantic to Georges Bank DAS used to set the following year's specifications. For example, if a vessel were allocated 12-Mid-Atlantic DAS and 12 Georges Bank DAS and had 7 DAS to carryover from the previous fishing year, 3.5 DAS would be allowed to be used in each region (i.e., DAS carryover would be split by the same proportion as original DAS allocation).
  - Mechanism to transition from non-regional DAS in Y1 > regional DAS in Y2 > non-regional DAS in Y3 (i.e., to add versatility to specifications setting to enable the ability to split DAS between regions when desired by the fishing industry). For example, if a vessel finishes the fishing year with 6 MA DAS and 6 GB DAS remaining, and total DAS carryover is capped at 10 DAS. How many DAS in each region are carried over into the following FY?
  - GARFO staff have shared that a proportional split combined with other DAS trading complexities (fractional trades, 3:1 trades) could make this very challenging to support.
- **Option 2: Carryover can be fished in either region, up to 10 DAS, without restriction** - A Limited Access vessel's remaining open-bottom DAS would be available to be fished in either Georges Bank or the Mid-Atlantic. While this could potentially redistribute effort allocated to a given region to another region, unrestricted carryover would maximize vessel operational flexibility and simplify accounting.
  - o This would reduce the benefit of regional allocations. If 10 MA DAS were carried over in Y1, these could all be fished on GB in Y2, for example. The PDT was

concerned that this could result in fishermen hedging future bets and forgo current effort in a lesser region for future fishing in a better region.

### **Northern Gulf of Maine (NGOM) sub-management areas**

The main purpose of developing NGOM sub-management areas is to limit the realized fishing mortality on Stellwagen Bank, where recent fishing effort has been heavily concentrated, and to redistribute effort to the other banks and ledges in the NGOM that support robust scallop beds. While high fishing mortality on Stellwagen Bank has led to local declines in adult scallop biomass, recruitment is likely substantially buffered by the nearby Western Gulf of Maine (WGOM) closure, which supports approximately 65% of the scallop biomass in the NGOM. Establishing sub-management areas would make realized effort more proportional to the fishing mortality rate across the NGOM that is used to set the NGOM Total Allowable Landings (TAL), providing greater stability in catch rates in future years. Additional benefits might include extending the length of the season and reducing vessel crowding on Stellwagen Bank, both concerns that have been consistently noted by scallop fishermen active in the NGOM.

The development of sub-management areas within the NGOM could allow the Council to set a fishing mortality rate in each sub-management area independently, however, the aggregate fishing mortality rate used to set the NGOM TAL would still be limited between  $F=0.15$  and  $F=0.25$ . Under the current regulations, if NGOM-South were to be closed ( $F=0$ ), then the Council would be limited to setting a TAL for NGOM-North so that the aggregate fishing mortality rate remained between  $F=0.15$  and  $F=0.25$ . Deductions for observer coverage and research set-aside would be equally split between the two areas.

PDT input: Differences in expected LPUE between sub-management areas? How would fishing effort be distributed? How would this affect the length of the ‘total’ NGOM season?

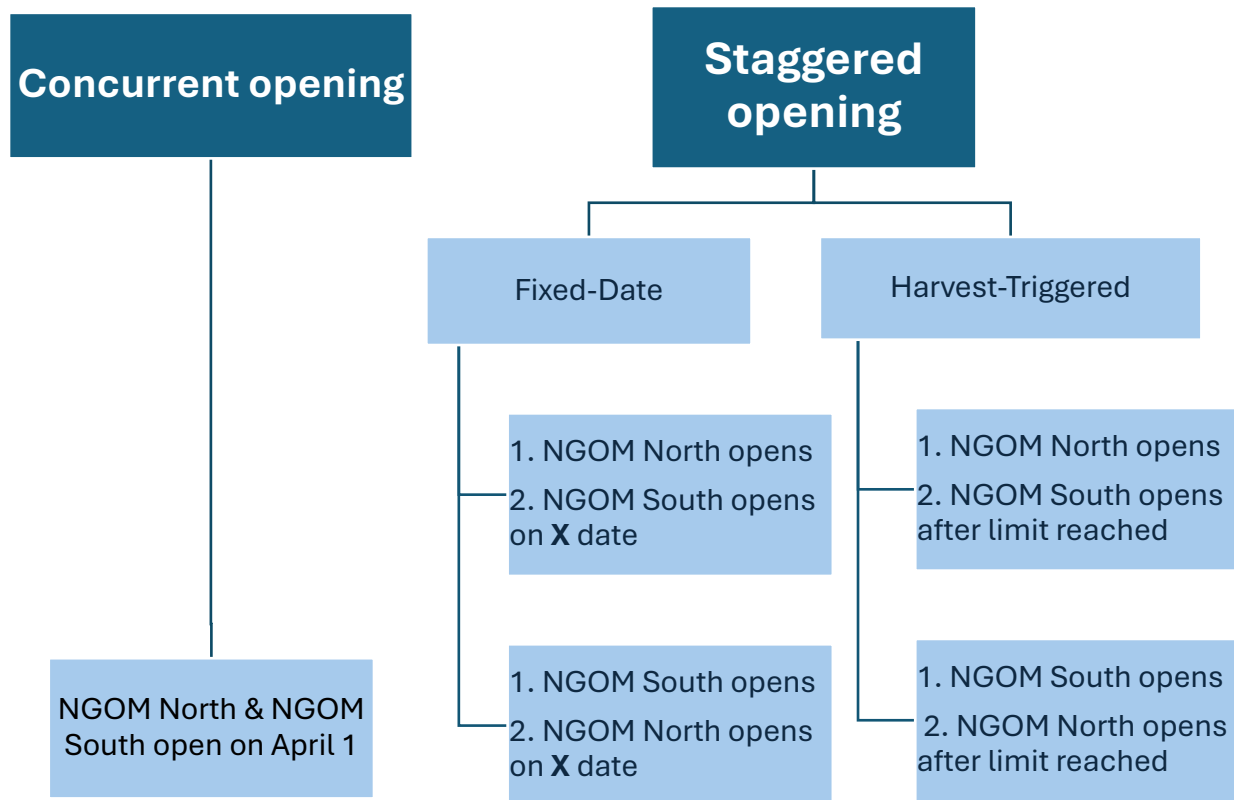
**PDT Goal:** provide recommendations to the AP and Committee for their consideration during their September 9<sup>th</sup> and 10<sup>th</sup> meetings

Scallop AP recommendations: The Scallop AP did not support further development of NGOM sub-management areas (i.e., keep as a single management area), however, several AP members provided input that making any sub-management areas available at the same time would have a greater positive impact on spreading out the fleet’s effort. The AP also recommended evaluating how recent fishing seasons would have unfolded under various sub-management area scenarios to better understand potential fleet responses. Other AP members noted that sub-management areas may not address concerns that they thought were more important to the management of the NGOM, such as improving fishing behavior and practices (high grading and deck loading), given these issues are a larger problem for the sustainability of the NGOM fishery.

Scallop Committee recommendations: The Scallop Committee supported continued development of management measures to create sub-management areas in the NGOM and tasked the PDT with the development of an alternative based on Concept 1 (Figure 1) and included options for both consecutive and concurrent access. The Committee was uncertain how concurrent access to

multiple sub-management areas would differ substantially from the current fishery (No Action). The Committee additionally tasked the Scallop PDT evaluating potential modifications to NGOM possession limits, including combinations of in-shell and shucked meats, as part of these measures.

Figure 2. Diagram of possible scenarios for opening of NGOM sub-management areas.



**The PDT should weigh in on the following:**

**1. Area boundaries**

- **Option 1: NGOM-South and NGOM-North bounded by the 41°15'N line (Figure 4)**
  - The NGOM scallop management area would be divided into two sub-management areas. Federally-permitted scallop vessels not on a declared trip into NGOM-South would be prohibited from transit.
    - Are there modifications to the 41°15'N line that should be considered
- **Option 2: NGOM-South and NGOM-North bounded by the 41°15'N line with a transit corridor in NGOM-South, west of 71°30'W (Figure 5)** – The NGOM scallop management area would be divided into sub-management areas. Federally-permitted scallop vessels not on a declared trip into NGOM-South would be allowed to continuously transit, with gear stowed, through NGOM-South west of 71°30'W.
  - Is this transit corridor necessary for vessel operational flexibility, or would this likely add undue enforcement complexity for minimal value?

- Note, in August 2026, OLE provided guidance stating that a transit corridor is **not** needed and may complicate monitoring; a more useful approach would be to require continuous transit and gear stowage, which is consistent with other closures and access areas.

## **2. *Timing of sub-area openings***

- **Option 1: Both sub-areas open simultaneously on April 1**
  - Likely offers the greatest vessel operational flexibility, allowing vessels to take trips in either/both areas where LPUE is greatest.
  - Could complicate enforcement and catch accounting due to multiple sub-areas being open simultaneously.
- **Option 2: NGOM-North opens on April 1, NGOM-South opens in April on a fixed date (e.g., April 15) or after NGOM-North is closed, whichever is earlier.**
  - Simplest logistically (along with Option 3) due to only 1 sub area open at one time
  - Could complicate NGOM scallop fishermen's ability to plan out their season without knowing when the other area would be available, which the PDT was concerned about with this option relative to Options 4 and 5.
  - May not address vessel crowding issues on Stellwagen Bank if large number of vessels opt to fish in the area on April 1, but fishing mortality would be sufficiently controlled.
- **Option 3: NGOM-South opens on April 1, NGOM-North opens in April on a fixed date (e.g., April 15) or after NGOM-South is closed, whichever is earlier.**
  - Simplest logistically (along with Option 2) due to only 1 sub area open at one time
  - Could complicate NGOM scallop fishermen's ability to plan out their season without knowing when the other area would be available, which the PDT was concerned about with this option relative to Options 4 and 5.
  - May not address vessel crowding issues on Stellwagen Bank if large number of vessels opt to fish in the area on April 1, but fishing mortality would be sufficiently controlled.

## **3. *Accountability measures***

- **Option 1: No Action – Maintain current NGOM accountability measure (PDT recommendation)**
  - AM would apply only if the NGOM set-aside were exceeded, not any sub-area harvest limit
- **Option 2: Modify NGOM accountability measure so that exceeding the portion of the NGOM set-aside set for each sub-area (i.e. sub-area harvest limit) would trigger a pound-for-pound payback for that sub-area.**
  - NGOM AM would apply a pound-for-pound payback specific to each sub-area, rather than applying to the total NGOM set-aside.

## **4. *Possession limits***



- **Option 1: No Action – Maintain the current possession limits in the NGOM of 200 lb of shucked meats and no more than 1,666 lb of in-shell scallops shoreward of the VMS demarcation line.**
- **Option 2: Implement a combined shucked meat/in-shell possession limit so that no more than 150% (e.g.) of the 200 lb possession limit may be possessed shoreward of the VMS demarcation line. In-shell scallops to shucked meats will continue to use a conversion factor of 8.33.**
  - Would allow a vessel to continue shucking while steaming back.
  - If a vessel had 50 lb of shucked meats at demarc, they could possess 2,082 lb of in-shell scallops, but would continue to be restricted to landing 200 lb.
  - If a vessel had 100 lb of shucked meats at demarc, they could possess 1,666 lb of in-shell scallops, but would continue to be restricted to landing 200 lb.
  - If a vessel had 200 lb of shucked meats at demarc, they could also possess 833 lb of in-shell scallops, but would continue to be restricted to landing 200 lb.

#### *Ideas for potential PDT analyses*

- Evaluate any change in fishing behavior with NGOM sub-management areas for potential derby-style fishing / continued concentration of fishing effort on Stellwagen Bank once quota becomes available?
- How to evaluate fleet responses based on historical data for concurrent fishing access? Should this be done (per AP suggestion)? Would vessels effectively shift/distribute effort?
  - Very little fishing effort in proposed NGOM-North in recent years
- Are there impacts to catch accounting that should be considered, given the current challenges with the short NGOM fishery that would be further split between two smaller areas with smaller harvest limits?

## **1.0 DRAFT FRAMEWORK 42 ALTERNATIVES**

### **1.1 ACTION 1 – REGIONAL DAY-AT-SEA MANAGEMENT**

#### **1.1.1 Establish regional boundaries for Scallop Day-at-Sea allocations**

##### **1.1.1.1 DRAFT Alternative 1 – No Action**

Under Alternative 1, there would be no change in where Scallop DAS are allocated (e.g., Scallop DAS are not allocated to a specific region).



*Rationale:* Maintaining non-region-specific Scallop DAS would maximize vessel operational flexibility, ensuring that Limited Access scallop vessels are able to focus fishing operations on the areas that are most economical.

Potential drawbacks include not directly reducing the risk of regional overfishing when there are large differences in LPUE, resulting in disproportionate fishing effort in one region.

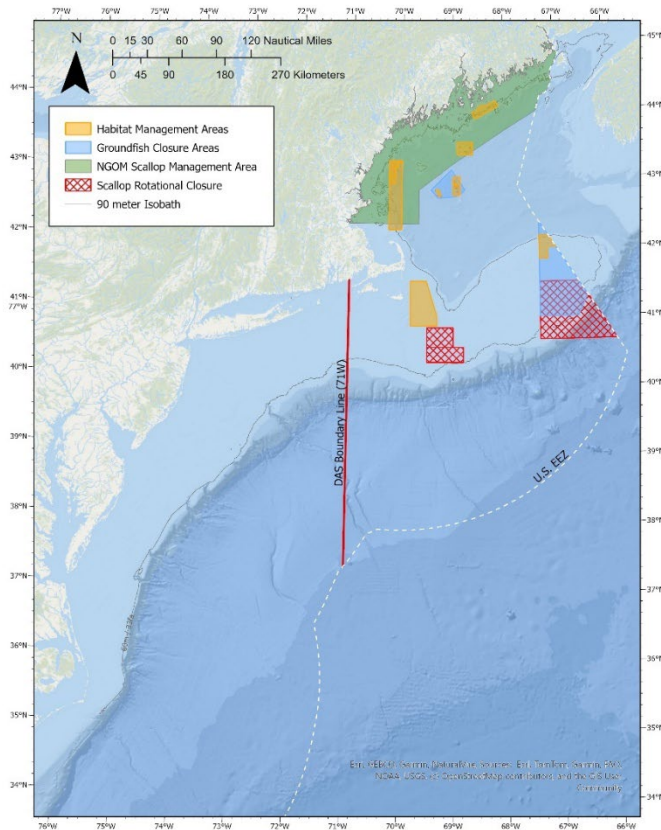
#### **1.1.1.2 DRAFT Alternative 2 – Regional Day-at-Sea (DAS) Allocations**

Alternative 2 would create separate DAS for the Georges Bank and the Mid-Atlantic regions as a future management tool, delineated by the 71°W boundary line Figure 2. Allocation of a set number of days east and west of the 71°W boundary would occur in future specifications actions; this alternative would create a one-time structural change and the option to allocate DAS separately by region in the future. Limited Access scallop vessels fishing on a regional DAS would be prohibited from crossing the 71°W boundary while on a declared Scallop DAS.

*Rationale:* Regional DAS allocation would reduce the risk of regional overfishing when large differences in LPUE result in disproportionate fishing effort in one region. Since 2021, much of the fleet's effort has been concentrated on Georges Bank, and the 2025 stock assessment concluded that overfishing occurred on Georges Bank in 2023. By establishing the necessary administrative and regulatory mechanisms through this action, such as VMS coding and DAS exchange capabilities, the tool would be available if needed in the future.

Potential drawbacks include added management complexity creating challenges for administration, monitoring, and enforcement; lack of clarity on how regional DAS allocations could be used to address concerns about localized overfishing; reduction in fleet flexibility, forcing vessels into areas where fishing conditions are poor (note, fishing is based on a variety of factors including price, meat quality, nematodes, water temperature, timing of fishing year); unintended consequences creating inequity, contributing to high-grading, or further concentration of fishing effort; survey information used to support regional allocations may be outdated by the time specifications are determined; uncertainty whether regional DAS would address fishery concerns.

*Figure 3. 71 °W is the proposed boundary line to delineate Mid-Atlantic from Georges Bank Days-at-Sea.*



## 1.1.2 Scallop Day-at-Sea trading measures

### 1.1.2.1 **DRAFT** Alternative 1 – No Action

Under Alternative 1, Limited Access scallop vessels would not be permitted to exchange regional DAS between vessels and would be restricted to fishing their allocated DAS in each region.

*Rationale:* By not establishing a mechanism to exchange DAS between vessels, Limited Access scallop vessels would be required to use DAS in the regions they were allocated.

### 1.1.2.2 **DRAFT** Alternative 2 – Scallop DAS may be exchanged between vessels with exchange ratio capped at 1:1

Under Alternative 2, Limited Access scallop vessels would be permitted to exchange regional DAS between vessels, but the ratio of DAS exchanges would be limited to a maximum 1:1 DAS.

*Rationale:* Exchanges of scallop DAS between regions would allow for scallop vessels to adjust their DAS allocations, increasing vessel operational flexibility. Limiting DAS exchanges to 1 DAS:1 DAS will maintain each Limited Access vessel's aggregate DAS allocation and prevent gains in efficiency from stacking more DAS on a single vessel than were original allocated.

### **1.1.2.3 DRAFT Alternative 3 – Scallop DAS may be exchanged between vessels with exchange ratio capped at 3:1**

Under Alternative 3, Limited Access scallop vessels would be permitted to exchange regional DAS between vessels, but the maximum ratio of DAS exchanges between vessels would be limited to 3:1 DAS.

*Rationale:* Exchanges of scallop DAS between regions would allow for scallop vessels to adjust their DAS allocations, increasing vessel operational flexibility. Limiting DAS exchanges to a maximum of 3 DAS:1 DAS will maintain each Limited Access vessel's aggregate DAS allocation and limit gains in efficiency from stacking more DAS on a single vessel than were original allocated while balancing increased vessel operational flexibility.

### **1.1.2.4 DRAFT Alternative 4 – Scallop DAS may be exchanged between vessels with no cap on the DAS exchange ratio**

Under Alternative 4, Limited Access scallop vessels would be permitted to exchange regional DAS between vessels with no limit on the maximum ratio of DAS exchanges between vessels.

*Rationale:* Exchanges of scallop DAS between regions would allow for scallop vessels to adjust their DAS allocations, increasing vessel operational flexibility. With no cap on the maximum ratio of DAS that could be exchanged, scallop vessels could exchange their entire DAS allocation

## **1.1.3 Scallop Day-at-Sea carryover measures**

### **1.1.3.1 DRAFT Alternative 1 (No Action) – Carryover DAS is not apportioned according to the current year regional allocation of DAS**

Under Alternative 1 (No Action), scallop DAS that are carried over to the next fishing year would not be apportioned between regions. Carryover DAS could be fished in the open area of Georges Bank and the Mid-Atlantic. The maximum number of unused open area DAS that could be carried over into the next fishing year would remain unchanged (i.e. 10 DAS).

### **1.1.3.2 DRAFT Alternative 2 – Apportion Carryover DAS according to current year fishery specifications**

Under Alternative 2, scallop DAS that are carried over to the next fishing year would be apportioned between regions by the proportional split specified in the fishing year they would be used. If non-regional DAS are allocated in the upcoming fishing year, carryover DAS would be converted to non-regional DAS up to the maximum number of carryover DAS. The maximum number of unused open area DAS that could be carried over into the next fishing year would remain unchanged (i.e. 10 DAS).

*Rationale:* Apportioning DAS carryover would ensure that the open area effort in a given fishing year is in line with the current year's scallop specifications.

## 1.2 ACTION 2 – NORTHERN GULF OF MAINE MANAGEMENT

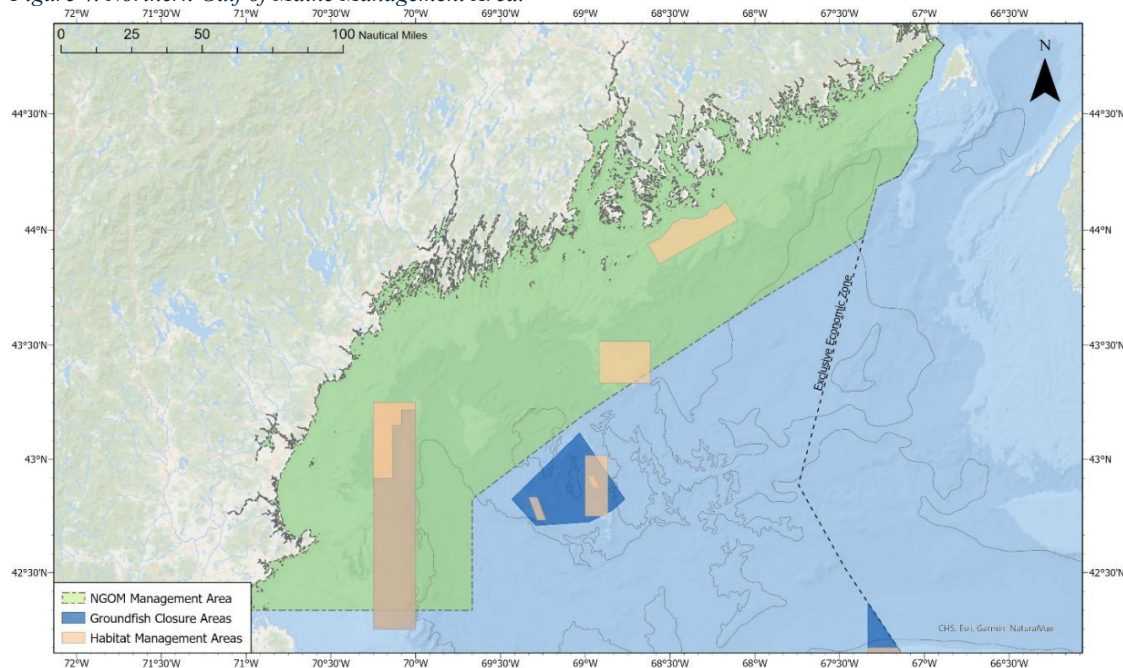
### 1.2.1 Establish sub-management areas in the Northern Gulf of Maine Scallop Management Area

#### 1.2.1.1 **DRAFT** Alternative 1 – No Action

Under Alternative 1, there would be no change to the Northern Gulf of Maine management area. The current NGOM Total Allowable Landings (TAL) is based on total exploitable biomass across the management area and a single fishing mortality target, while realized fishing mortality may be higher in one part of NGOM relative to another area.

*Rationale:* Maintaining NGOM as one area would not further sub-divide the area, leading to greater vessel operational flexibility. This simpler management approach would continue to enable the fishery to largely govern itself through fleet behavior. Concentration of fishing effort on Stellwagen Bank would not be directly addressed under this alternative but may be indirectly addressed through changing scallop resource conditions. For example, recent declines in exploitable biomass on Stellwagen Bank may lead to greater homogeneity in LPUE across the NGOM scallop resource, which would be expected to disperse the scallop fleet across the management area.

Figure 4. Northern Gulf of Maine Management Area.



### **1.2.1.2 DRAFT Alternative 2 – Establish Northern Gulf of Maine sub-management areas without a corridor for vessel transit**

Alternative 2 would create two Northern Gulf of Maine sub-management areas, NGOM-North and NGOM-South, divided by the 41°15'N. The proportion of the NGOM Set-Aside allocated to each sub-management area would be defined so that the aggregate fishing mortality rate of the NGOM scallop management area is between  $F=0.15$  and  $F=0.25$ . This alternative would create a one-time structural change and the option to allocate effort across two sub-management areas in the future but does not set fishery specifications for either area.

Alternative 2 would define these management boundaries without establishing a transit corridor in the NGOM-South west of 71°35'W.

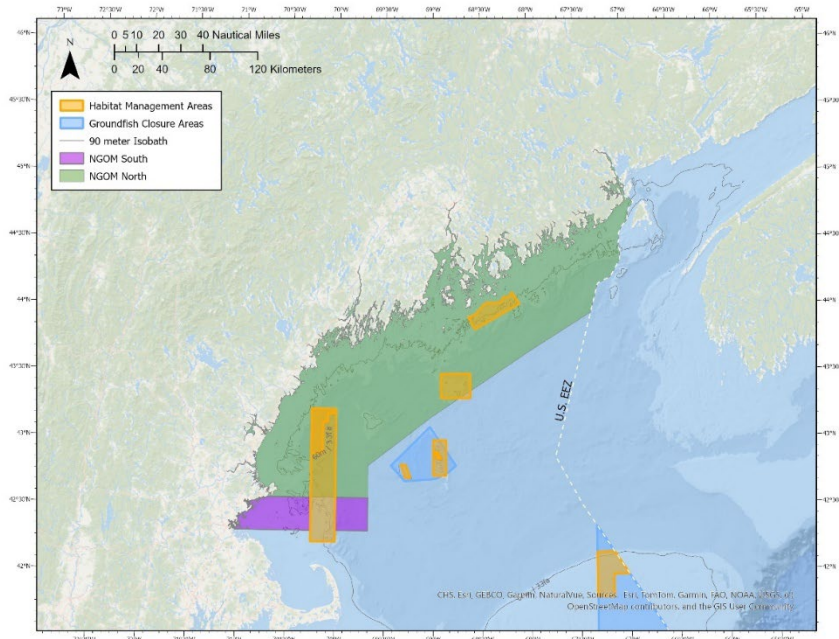
The NGOM accountability measure (pound-for-pound payback) would be specific to each sub-management area. 0.5% of the NGOM ABC would be set-aside from each sub-management area for observer coverage, and 12,500 lbs. would be set-aside from each sub-management area for research.

*Rationale:* The development of sub-management areas within the NGOM would be an additional tool to reduce fishing pressure on Stellwagen Bank and encourage effort on other banks and ledges that contain substantial scallop biomass but generally support lower catch rates. The sub-management areas could also allow the Council to set a fishing mortality rate in each area independently to help account for differences in higher realized fishing mortality on Stellwagen, for example, relative to the rest of NGOM. The aggregate fishing mortality rate used to set the NGOM TAL would still be limited between  $F=0.15$  and  $F=0.25$ , however. Under the current regulations, if the southern area were to be closed ( $F=0$ ), then the Council would be limited to setting a TAL for the northern sub-management area so that the aggregate fishing mortality rate remained between  $F=0.15$  and  $F=0.25$ . Alternative 2 would therefore help prevent exceeding the removal of legal biomass/fishing mortality rate in a given sub-management area. Deductions for observer coverage and research set-aside would be equally split between the two sub-management areas.

Potential benefits of sub-management areas include reducing vessel crowding on Stellwagen, distributing fishing effort more broadly, and extending the duration of the fishing season. Potential drawbacks of sub-management areas include the added management complexity; the challenge of additional monitoring and enforcement, though NOAA indicated sub-management areas could be supported operationally; and may not achieve the stated objective of reducing vessel crowding if the difference in LPUE between the two sub-management areas is too large.



Figure 5. Alternative 2, NGOM North and NGOM South without a corresponding transit corridor.



### 1.2.1.3 **DRAFT** Alternative 3 – Establish Northern Gulf of Maine sub-management areas with a corridor for vessel transit

Alternative 3 would create two Northern Gulf of Maine sub-management areas, NGOM-North and NGOM-South, divided by the 41°15'N. The proportion of the NGOM Set-Aside allocated to each sub-management area would be defined so that the aggregate fishing mortality rate of the NGOM scallop management area is between  $F=0.15$  and  $F=0.25$ . This alternative would create a one-time structural change and the option to allocate effort across two sub-management areas in the future but does not set fishery specifications for either area.

Alternative 2 would define these management boundaries and establish a transit corridor in the NGOM-South west of 71°35'W. This area would be

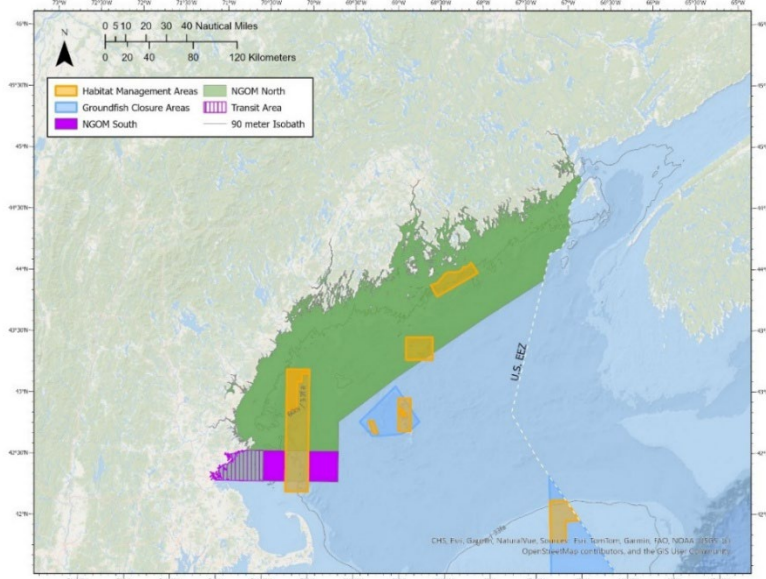
The NGOM accountability measure (pound-for-pound payback) would be specific to each sub-management area. 0.5% of the NGOM ABC would be set-aside from each sub-management area for observer coverage, and 12,500 lbs. would be set-aside from each sub-management area for research.

*Rationale:* The development of sub-management areas within the NGOM would be an additional tool to reduce fishing pressure on Stellwagen Bank and encourage effort on other banks and ledges that contain substantial scallop biomass but generally support lower catch rates. The sub-management areas could also allow the Council to set a fishing mortality rate in each area independently to help account for differences in higher realized fishing mortality on Stellwagen, for example, relative to the rest of NGOM. The aggregate fishing mortality rate used to set the

NGOM TAL would still be limited between  $F=0.15$  and  $F=0.25$ , however. Under the current regulations, if the southern area were to be closed ( $F=0$ ), then the Council would be limited to setting a TAL for the northern sub-management area so that the aggregate fishing mortality rate remained between  $F=0.15$  and  $F=0.25$ . Alternative 2 would therefore help prevent exceeding the removal of legal biomass/fishing mortality rate in a given sub-management area. Deductions for observer coverage and research set-aside would be equally split between the two sub-management areas.

Potential benefits of sub-management areas include reducing vessel crowding on Stellwagen, distributing fishing effort more broadly, and extending the duration of the fishing season. Potential drawbacks of sub-management areas include the added management complexity; the challenge of additional monitoring and enforcement, though NOAA indicated sub-management areas could be supported operationally; and may not achieve the stated objective of reducing vessel crowding if the difference in LPUE between the two sub-management areas is too large.

Figure 6. Alternative 2, NGOM North and NGOM south including a transit corridor west of 71°35'W.



## 1.2.2 Timing of Access in NGOM Sub-Management Areas

### 1.2.2.1 **DRAFT** Alternative 1 – Concurrent Access

Under Alternative 1, both sub-management areas would open simultaneously.

*Rationale:* Simultaneous access would provide additional flexibility and could naturally distribute fishing effort. Multiple VMS codes would be required to support and differentiate between the two sub-management areas. This option would also be a more complex spatial management structure. The fishing season could potentially be extended if effort is distributed across the two sub-management areas versus concentrated on Stellwagen Bank early in the fishing year.



Concurrent access would be harder for NOAA Office of Law Enforcement to enforce, especially if vessels were allowed to transit through closed areas, relative to sequential access; enforcement is still possible, though more complex.

#### **1.2.2.2 DRAFT Alternative 2 – NGOM-North open on April 1, NGOM-South opens after NGOM-North is closed**

Under Alternative 2, NGOM-North would be open for declared NGOM scallop trips on April 1, and NGOM-South would open once the NGOM-North Set-Aside has been harvested. Once the NGOM-South Set-Aside has been harvested, that sub-area would also close.

*Rationale:* Sequential access would help distribute effort spatially and would be easier to implement, monitor, and enforce. This type of access would reduce the number of VMS declaration codes needed, relative to Alternative 1. The fishing season could potentially be extended if effort is distributed across the two sub-management areas versus concentrated on Stellwagen Bank early in the fishing year.

#### **1.2.2.3 DRAFT Alternative 3 – NGOM-South opens on April 1, NGOM-North opens after NGOM-South is closed**

Under Alternative 3, NGOM-South would be open for declared NGOM scallop trips on April 1, and NGOM-North would open once the NGOM-South Set-Aside has been harvested. Once the NGOM-North Set-Aside has been harvested, that sub-area would also close.

*Rationale:* Sequential access would help distribute effort spatially and would be easier to implement, monitor, and enforce. This type of access would reduce the number of VMS declaration codes needed, relative to Alternative 1. The fishing season could potentially be extended if effort is distributed across the two sub-management areas versus concentrated on Stellwagen Bank early in the fishing year.

#### **1.2.2.4 DRAFT Alternative 4 – NGOM-North opens on April 1, NGOM-South opens on May 1**

Under Alternative 4, NGOM-North would be open for declared NGOM scallop trips on April 1, and NGOM-South would open on May 1. Each sub-management area would close when the allocated proportion of the NGOM Set-Aside has been harvested.

*Rationale:* Sequential access would help distribute effort spatially and would be easier to implement, monitor, and enforce. This type of access would reduce the number of VMS declaration codes needed, relative to Alternative 1. The fishing season could potentially be extended if effort is distributed across the two sub-management areas versus concentrated on Stellwagen Bank early in the fishing year. Setting the sub-management areas to open on fixed dates would allow vessels a greater opportunity to plan fishing operations around the opening dates.

#### **1.2.2.5 DRAFT Alternative 5 – NGOM-South opens on April 1, NGOM-North opens on May 1**

Under Alternative 5, NGOM-South would be open for declared NGOM scallop trips on April 1, and NGOM-North would open on May 1. Each sub-management area would close when the allocated proportion of the NGOM Set-Aside has been harvested.

*Rationale:* Sequential access would help distribute effort spatially and would be easier to implement, monitor, and enforce. This type of access would reduce the number of VMS declaration codes needed, relative to Alternative 1. The fishing season could potentially be extended if effort is distributed across the two sub-management areas versus concentrated on Stellwagen Bank early in the fishing year. Setting the sub-management areas to open on fixed dates would allow vessels a greater opportunity to plan fishing operations around the opening dates.