

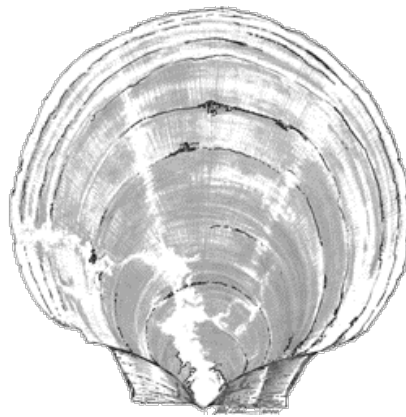
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Summary of Public Scoping Comments

for

Amendment 21 to the

Atlantic Sea Scallop Fishery Management Plan



May 15, 2019

Compiled by the
Atlantic Sea Scallop Plan Development Team

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1.0 INTRODUCTION

The New England Fishery Management Council (NEFMC) has proposed developing Amendment 21 to the Atlantic Sea Scallop Fishery Management Plan (A21) to address three specific issues: 1) measures related to the Northern Gulf of Maine (NGOM) Management Area, 2) Limited Access General Category (LAGC) individual fishing quota (IFQ) possession limits, and 3) the ability of Limited Access vessels with LAGC IFQ to transfer quota to LAGC IFQ only vessels. The scoping period for this amendment began in late February and closed on April 15, 2019. The Council accepted written and oral scoping comments on this action. Written comments were submitted to the NEFMC and ten public hearings were held, moderated by the Atlantic Sea Scallop Committee chairman and supported by NEFMC staff. All written (letters and emails) and oral comments (summary and audio recordings) are available for review by the NEFMC and public. This report summarizes the demographics of commenters and the key themes of their statements. This report does not respond to the comments. It is intended to serve as a guide for reviewing the comments and should not substitute for reading the comments directly.

All comments received during the scoping period are summarized here. This includes the written comments and summaries of each hearing that contain close (but not exact) transcriptions of the oral comments. If a person spoke multiple times at a given hearing, that was considered to be one comment.

The range of rationales is included here in no order. Excerpts from comments are inserted below to help capture the flavor of the themes that have been identified. This summary is not intended to be a substitute for the comments received through Amendment 21 scoping – interested parties should consult the full text of scoping meeting summaries and scoping comments, which are available on the Council’s website at this link: <https://www.nefmc.org/library/amendment-21>

2.0 DESCRIPTION OF COMMENTERS

Oral Commenters

Table 1. Public hearing attendance

Location	Attendees	Speakers
Rockport, ME	45	8
Gloucester, MA	28	13
Chatham, MA	18	4
New Bedford, MA	24	11
Narragansett, RI	12	10
Riverhead, NY	4	1
Manahawkin, NJ	25	9
Cape May, NJ	6	4
Hampton, VA	18	4
webinar	8	1
Total	188^a	57^b
^a Includes duplicates.		
^b Duplicates removed.		

The total attendance for the 10 public hearings was about 188, but some people attended more than one hearing. 57 different people spoke about Amendment 21 (Table 1). Oral comments were received from 52 people representing themselves or their business (91%), four people representing fishing organizations (7%), and one representing themselves and an organization (2%).

Written Commenters

There were 24 written comments (letters and e-mails) received during the comment period, signed by 26 people. There were 19 written comments from individuals or businesses (79%), four from fishing organizations (17%), and one from a government agency (4%). The one agency (U.S. Fish and Wildlife Service) indicated it has no substantive comments on Amendment 21. Thus, this letter is not considered further in this summary, which focuses on the stakeholders providing substantive comment. There were five anonymous commenters

Oral and Written Commenters Combined

Through the **81 comments** (i.e., 57 oral and 24 written), **73 people** gave input (duplicates removed) on Amendment 21. Note, some comments were given by people who represent businesses or organizations, and the total number of people those businesses or organizations represent cannot be determined. Of the 73 commenters, 47 people submitted just oral comments, 16 people submitted just written comments, and 10 people submitted both (Table 2). Sixteen (22%) of the 73 people made more than one comment (e.g., spoke at more than one hearing or spoke and submitted a letter). In all, 63 people commented on behalf of themselves or a business, one person commented on behalf of themselves and an organization, eight commented on behalf of an organization (six organizations in all were represented, Table 3), and one on behalf of an agency.

The 72 commenters represent multiple stakeholder types, but primarily are active in the scallop fishery (Table 2). The 60 people who own/hold scallop vessels/permits, fell into six different sub-categories, those with: 1) Northern Gulf of Maine (NGOM) permits/vessels, 2) Limited Access (LA) permits/vessels, 3) Individual Fishing Quota (IFQ) permits/vessels, 4) a LA vessel(s) and a separate IFQ vessel(s), 5) a LA vessel(s) with an IFQ permit on the same vessel, and 6) a LA vessel with an IFQ permit and another IFQ vessel or IFQ permit in Confirmation of

Permit History (CPH). About half of these commenters (n=31) are IFQ-only scallop fishermen, while around a quarter participate exclusively in the NGOM portion of the fishery.

Table 2. Primary stakeholder type of commenters

Primary stakeholder type	Oral only	Oral & written	Written only	Total
Scallop fishery - NGOM only	11	3	2	16
Scallop fishery - LA only	3	0	0	3
Scallop fishery - IFQ only	20	2	9	31
Scallop fishery - LA vessel and IFQ vessel	0	1	0	1
Scallop fishery - LA vessel with IFQ permit on same vessel	1	1	0	2
Scallop fishery – LA vessel with IFQ permit plus IFQ vessel or CPH	7	0	0	7
Shoreside support services	2	1	0	3
Fishing organization	2	2	4	8
Government	0	0	1	1
Other interested public	1	0	0	1
Total commenters	47	10	16	73

Table 3 – Fishing organizations that commented

Associated Fisheries of Maine
Cape Cod Fisheries Trust
Fisheries Survival Fund
Maine Coast Fishermen’s Association
Marth’s Vineyard Fishermen’s Preservation Trust
United National Fishermen’s Association

Table 4 - Home state of commenters

State	Number of commenters	% of Total Commenters
ME	20	27%
MA	24	33%
RI	3	4%
NY	2	3%
NJ	15	21%
DC	3	4%
VA	3	4%
Unknown	3	4%
Total	73	100%

Commenters were from six states and the District of Columbia (Table 4), primarily Maine (27%), Massachusetts (33%) and New Jersey (21%). Home state could not be identified for three of the anonymous commenters (4%).

3.0 CONTENT OF COMMENTS

For the most part, scoping comments were focused on the three main topics identified in the scoping document: management of the Northern Gulf of Maine area, LAGC IFQ possession limits, and the transfer of quota from LA vessels to LAGC IFQ-only vessels. This section summarizes the comments. Note that not everyone chose to comment on each of these topics. Within each topic, there was much variety on what people chose to focus on.

3.1 NGOM AREA

Comments regarding management of the Northern Gulf of Maine area were provided by three fishing organizations and 32 people on behalf of themselves or their business, through 27 oral and 13 written comments (Table 5). The NGOM scallop fisherman primarily supported No Action management in the area for the commercial fishery and for developing a Research Set Aside program. Other scallopers who commented, primarily supported allowing continued access to the NGOM area by LA vessels (Table 6). Scallopers who supported the status quo measures were primarily from Maine, while others were mostly from New Jersey and other states (Table 7).

Boundary. Supporters of keeping the current NGOM management area (n=15; No Action) were cautious about moving a boundary line after it was set over ten years ago simply because of shifts in scallop distribution. Others (n=3) felt that the boundary should be considered in the amendment.

“...if we are going to move the line whenever there is a change in biomass distribution, we will be consistently drawing new lines in the ocean.”

Gear. Supporters of having all vessels fish with the same gear restrictions (a single 10' dredge) felt that it would help preserve the small-boat nature of the fishery in the NGOM and the unique habitats and would provide equal access to the resource (n=10). There were no comments supporting use of other gears.

“I support consistent gear restrictions because I believe it is fair and would provide equal access to all vessels that fish in the Northern Gulf of Maine.”

Permits. Those who want to prohibit other permits from shifting to NGOM permits want to avoid large increases in the number of active scallop vessels in the NGOM that may exceed the amount of effort the area can support. Others would like to explore options that would allow limited permit shifting, allowing for new entrants if it can be done sustainably.

Allocation (TAC split). Supporters of keeping the current TAC split between LA and LAGC vessels like that it gives smaller vessels a spring fishery and feel that it is fair, equitable, and worked well in 2018. There were no comments supporting another specific split, but the LA fishermen who commented would like continued access to the NGOM area.

“LA fishermen do not want to be on the outside looking in if there were to be an increase in biomass in the NGOM in the future or if resource shifts north. We have federal scallop permits that have fished in the Gulf of Maine in the past and we do not want to lose our right to fish there in the future.”

Table 5 – Commenters and comments on management of the NGOM area

Topic		Commenters			Comments		
		Orgs. ^a	Individ.	Total	Oral ^b	Written	Total
Commented on NGOM area management^c		3(5)	32	35	27	13	40
Boundary	Keep current boundary (No Action)	2	13	15	11	7	18
	Move boundary	0	3	3	2	1	3
Gear	Require use of the same gear for all vessels/ permits	1	9	10	9	4	13
Permits	Allow limited permit shifting (No Action)	2	0	2	1	2	3
	Prohibit other permits shifting to NGOM permits	0	8	8	3	6	9
Allocation	Keep current LA-LAGC split (No Action)	1	9	10	8	6	14
	Create a different split	0	1	1	0	1	1
	Keep LA vessels in NGOM fishery	1(3)	10	11	8	3	11
Time/ sub-areas	Keep current opening date, no trimesters (No Action)	1	9	10	9	3	12
	Spreading timing out	0	4	4	3	1	4
	Allow access to groundfish closed areas	0	4	4	4	0	4
	Create sub-areas	0	1	1	1	0	1
	Enable trimesters/sub-areas through future framework	2	6	8	4	6	10
Trip limit	Keep current trip limit (No Action)	1(3)	1	2	1	1	2
	Increase trip limit	0	3	3	3	0	3
	Add DAS to current trip limit	1(3)	0	1	0	1	1
Science	Create RSA in NGOM	1	12	13	9	7	16
	Create electronic monitoring	1	4	5	4	2	6
Uncertain or neutral preference on NGOM		1	4	5	4	1	5
Notes: ^a (x) notes the number of individuals representing fishing organizations. ^b If a person spoke at more than one hearing on a topic, it is counted here as one oral comment. ^c General comments are counted in this row in addition to comments on possible alternatives.							

Time/sub-areas. Supporters of keeping the current opening date believed that a later opening date may create gear conflicts with other fisheries (e.g., tuna) or result in increased bycatch. A few people wanted to see the fishery extend longer or cautioned against having the LAGC and LA vessels operating in the NGOM at the same time. A few would like to have access to groundfish closed areas (Jeffreys Ledge, Fippennies Ledge) or develop sub-area TACs. Several commenters would like to consider trimesters or sub-area management in the future should the resource increase and survey data improve and would like to use this amendment to allow doing so through a future framework.

“I do not think we should use trimester management in the NGOM due to potential gear conflicts and because there isn’t good enough science or a big enough TAC to support it.”

Table 6 - Commenters on management of the NGOM area, by primary stakeholder type

Topic		Scallop fishery		Fishing orgs.	Other	Total
		NGOM	Other			
Commented on NGOM area management^a		16	15	3	1	35
Boundary	Keep current boundary (No Action)	12	0	2	1	15
	Move boundary	0	3	0	0	3
Gear	Require use of the same gear for all vessels/permits	8	0	1	1	10
Permits	Allow limited permit shifting (No Action)	0	0	2	0	2
	Prohibit other permits shifting to NGOM permits	7	0	0	1	8
Allocation	Keep current LA-LAGC split (No Action)	8	0	1	1	10
	Create a different split	1	0	0	0	1
	Keep LA vessels in NGOM fishery	0	10	1	0	11
Time/ sub- areas	Keep current opening date, no trimesters (No Action)	8	0	1	1	10
	Spreading timing out	3	1	0	0	4
	Allow access to groundfish closed areas	3	1	0	0	4
	Create sub-areas	1	0	0	0	1
	Enable trimesters/sub-areas through future framework	5	0	2	1	10
Trip limit	Keep current trip limit (No Action)	1	0	1	0	2
	Increase trip limit	2	1	0	0	3
	Add DAS to current trip limit	0	0	1	0	1
Science	Create RSA in NGOM	10	1	1	1	13
	Create electronic monitoring	4	0	1	0	5
Uncertain or neutral preference on NGOM		0	4	1	0	5
Notes: “Other” = shoreside support and other interested public.						
^a General comments are counted in this row in addition to comments on possible alternatives.						

Trip limit. Relative to other aspects of NGOM management, a small number of commenters discussed trip limits in the NGOM, currently 200 lbs. While a few commenters supported maintaining a low trip limit for the NGOM fishery, others wanted it increased; one idea was to 400 lbs. Restrictions on the number of landing days per week or using days-at-sea in combination with a trip limit were suggested ways to constrain effort.

“At the current 200-pound trip limit, I see a lot of guys burning more and more fuel. I think it is worth increasing the NGOM possession limit from 200 pounds to 400 pounds, and potentially limiting the number of times you can land in a week; this would allow boats to land the same amount of product in the same time frame, but would reduce fuel costs.”

Science. Most people who commented on NGOM issues support the idea of improving scallop surveys and developing an RSA program for the area, though there were no specifics offered for where the RSA compensation pounds might come from. A few supported transitioning to electronic monitoring, but one was cautious about imposing at-sea monitoring costs on LAGC vessels.

Other ideas. One commenter suggested that the NEFMC consider allocating DAS with trip limits to NGOM permit holders and remove the management boundary. It was suggested that the DAS could be fished outside of the NGOM and that LA vessels would have access to the entire GOM.

Table 7 - Support of NGOM ideas by home state, scallop fishery only

Topic		ME	MA	RI	NJ	VA	Unk.	Total
Commented on NGOM area management^a		16	2	1	11	1	0	31
Boundary	Keep current boundary (No Action)	11	1	0	0	0	0	12
	Move boundary	0	0	0	3	0	0	3
Gear	Require use of the same gear for all vessels/permits	7	1	0	0	0	0	8
Permits	Allow limited permit shifting (No Action)	0	0	0	0	0	0	0
	Prohibit other permits shifting to NGOM permits	6	1	0	0	0	0	7
Allocation	Keep current LA-LAGC split (No Action)	8	0	0	0	0	0	8
	Create a different split	1	0	0	0	0	0	1
	Keep LA vessels in NGOM fishery	0	0	0	9	1	0	10
Time/ sub-areas	Keep current opening date, no trimesters (No Action)	8	0	0	0	0	0	8
	Spreading timing out	3	1	0	0	0	0	4
	Allow access to groundfish closed areas	4	0	0	0	0	0	4
	Create sub-areas	1	0	0	0	0	0	1
	Enable trimesters/sub-areas through future framework	5	0	0	0	0	0	5
Trip limit	Keep current trip limit (No Action)	1	0	0	0	0	0	1
	Increase trip limit	3	0	0	0	0	0	3
	Add DAS to current trip limit	0	0	0	0	0	0	0
Science	Create RSA in NGOM	10	0	0	1	0	0	11
	Create electronic monitoring	4	0	0	0	0	0	4
Uncertain or neutral preference on NGOM		0	1	1	0	1	1	4
^a General comments are counted in this row in addition to comments on possible alternatives.								

3.2 LAGC IFQ POSSESSION LIMITS

Comments regarding the LAGC IFQ possession limit were provided by four fishing organizations and 42 people on behalf of themselves or their business, through 36 oral and 14 written comments (Table 8). These commenters were primarily scallop fishermen (n=41), mostly a mix of IFQ and LA permit holders (Table 9). Just one of the NGOM permit holders commented on this topic.

Supporting No Action. Commenters supporting No Action (n=19, Table 8, Table 9), keeping the possession limit at 600 lbs. per trip, thought an increased possession limit would decrease safety, particularly for smaller vessels, due to vessels fishing longer trips and needing larger crews. With longer trips and greater safety risks, it was suggested that insurance costs would increase. There was also concern that smaller vessels would not have the capacity to safely deck-load the weight of live (in-shell) scallops needed to land a substantially higher limit. There were concerns that an increased trip limit would decrease product quality and create market gluts. It was felt that the quota would be caught quicker at a higher trip limit, allowing vessels to shift effort into other fisheries that may not be able to support additional effort. There were several comments that a higher limit would incentivize use of larger vessels, straying from the vision of the LAGC fishery established through Amendment 11. There was a sense that lease prices would increase, to the benefit of quota share holders and at the expense of those fishermen reliant on leasing.

“Taking away opportunity from small boats and small ports would be harmful to the fishery and would possibly go against our vision of this fishery in Amendment 11.”

“If we increase the trip limit, we will be increasing the profit of these “arm-chair captains” at the expense of the actual fishermen.”

“[It] has the very real potential to shift effort into other fisheries through the use of latent fishery permits on vessels that may give up scallop fishing as quota is consolidated on a fleet of fewer vessels harvesting the same quota available today.”

Table 8 – Support of LAGC IFQ possession limit ideas

Topic	Commenters			Comments		
	Orgs. ^a	Individ.	Total	Oral ^b	Written	Total
Commented on LAGC IFQ possession limit^c	4(6)	42	46	36	14	50
Reduce limit	0	1	1	1	0	1
Keep current limit (No Action)	1(3)	18	19	12	10	22
Increase limit	2	16	18	14	4	18
Increase limit only in access areas	1	2	3	3	0	4
Increase limit only in open areas	0	1	1	1	0	1
Increase limit in open and access areas	0	3	3	1	2	3
Uncertain or neutral preference on limit	0	5	5	5	0	5
Notes: ^a (x) notes the number of different individuals representing fishing organizations. ^b If a person spoke at more than one hearing on a topic, it is counted here as one oral comment. ^c General comments are counted in this row in addition to comments on possible alternatives.						

Table 9 - Support of LAGC IFQ possession limit ideas by primary stakeholder type of commenters

Primary stakeholder type	IFQ only	LA only	LA and IFQ combo			Orgs.	Other	Total
			1	2	3			
Commented on LAGC IFQ possession limit^a	27	3	1	2	7	4	2	46
Reduce limit	0	0	0	0	1	0	0	1
Keep current limit (No Action)	12	2	1	1	2	1	0	19
Increase limit	13	0	0	0	2	2	1	18
Increase limit only in access areas	1	1	0	0	0	1	0	3
Increase limit only in open areas	1	0	0	0	0	0	0	1
Make the same limit in open and access areas	2	0	0	0	1	0	0	3
Uncertain or neutral preference on limit	3	0	0	0	2	0	0	5
Notes: 1 = LA vessel and IFQ vessel 2 = LA vessel with IFQ permit on same vessel 3 = LA vessel with IFQ permit plus IFQ vessel or CPH "Other" = NGOM only, shoreside support, other interested public. ^a General comments are counted in this row in addition to comments on possible alternatives.								

Supporting an increase. Commenters supporting a possession limit increase (n=18, Table 8, Table 9) thought it would reduce the total number of fishing trips, resulting in lower operating costs (less fuel, boat maintenance and crew costs) and improved monitoring without additional enforcement costs. Some felt that reducing the number of trips would improve safety by reducing steaming time and allow for more flexibility in when trips could occur. Some were concerned that there has been localized depletion inshore, and that a higher trip limit would make it worthwhile for vessels to fish high-density areas farther offshore (note: a few felt that the trip limit was not the way to solve inshore depletion but may aggravate it if vessels fished harder inshore). One commenter felt that if the limit were to increase, it should only increase in open areas, because a higher trip limit in access areas would cause a derby and limit opportunities for smaller vessels. A few felt that the increase would not impact operations or costs substantially.

"We are consuming a lot of fuel to catch 600 pounds—if we were able to catch a little bit more on every trip, we could save on fuel and wear and tear on the boat and have a little more to pay the crew."

"When it comes to safety concerns, I am in support of anything that will reduce steaming time."

"In my experience, one of the biggest safety concerns with fishing is transiting in and out of the [Barnegat Light] inlet—if increasing the trip limit reduces the number of times you need to transit in and out of the inlet, it will lessen the potential for disaster on a boat."

"If they could catch a little more on every trip maybe they'd fish farther offshore and give the near shore areas a break."

“As far as access area quotas, they should be the same as open areas so as not to give any geographic area an advantage in catching the available quota.”

“We believe an increase in daily trip limits will not create disparity between fishermen who lease quota and those that own quota because both parties are subject to costs whether it be lease fees or the bank payments for quota owned.”

Table 10 - Support of LAGC IFQ possession limit ideas by home state, scallop fishery only

Topic	ME	MA	RI	NY	NJ	VA	Unk.	Total scallopers
Commented on LAGC IFQ possession limit^a	2	16	2	2	14	2	3	41
Reduce limit	0	0	0	0	1	0	0	1
Keep current limit (No Action)	0	5	2	0	7	2	2	18
Increase limit	1	9	0	1	2	1	1	15
Increase limit only in access areas	0	1	1	0	0	0	0	2
Increase limit only in open areas	0	1	0	0	0	0	0	1
Make the same limit in open and access areas	0	0	0	1	1	1	0	3
Uncertain or neutral preference on limit	0	2	1	0	2	0	0	5
Total scallopers	2	18	3	2	15	3	3	

^a General comments are counted in this row in addition to comments on possible alternatives.

Other approaches. Several commenters suggested other types of alternatives:

- In access areas, account for access in pounds, not trips.
- Change from a daily to a weekly possession limit.
- Create an aggregate limit.
- Create a tiered limit.
- If the trip limit increases, then develop measures that would:
 - Require lay-over time in port.
 - Create vessel capacity restrictions.
 - Control quota lease prices.
 - Increase the current observer set-aside proportionally with any increase in the LAGC IFQ possession limit

3.3 IFQ TRANSFERS

Comments regarding IFQ transfers were provided by four fishing organizations and 27 people on behalf of themselves or their business, through 22 oral and 9 written comments (Table 11).

Supporting No Action. A few commenters supporting No Action (n=3, Table 11), prohibiting quota transfers from LA to LAGC vessels, felt that it would only benefit LA vessels and/or change the nature of the LAGC fleet as established through Amendment 11. It was suggested to consider temporary vs. permanent transfers.

Supporting transfer from LA to LAGC. Supporters of allowing LA vessels to transfer IFQ quota to LAGC vessels (n=27, Table 11) would like to have more quota available to the LAGC vessels

and feel it would allow more quota to be harvested. Some suggested that both temporary and permanent transfers be allowed.

“I only see this as a benefit for LAGC fishermen—both for those who are trying to build up their quota base, and also because it may keep the lease price at bay...”

“...we do have some concern that quota would only be leased down to LAGC IFQ vessels within the same ownership entity and not be available to the rest of the fleet.”

“If moving these permits around the industry helps to develop younger fishermen and aid in the transition of the fishery to the next generation, then [we] would support this added level of flexibility.”

Other comments. One person suggested allowing transfers of IFQ quota between LA vessels. Others felt that the transfer from LAGC to LA, should continue to not be allowed.

Table 11 - Comments on the IFQ transfers

Topic	Commenters			Comments	
	Orgs. ^a	Individ.	Total	Oral ^b	Written
Commented on IFQ transfers^c	4(6)	27	31	22	9
Prohibit transfer from LA to LAGC (No Action)	1	2	3	0	3
Allow transfer from LA to LAGC	3(5)	24	27	21	6
Prohibit transfer from LAGC to LA	1	2	3	1	2
Uncertain or neutral preference on transfer	0	1	1	1	0
Notes: ^a (x) notes the number of individuals representing fishing organizations. ^b If a person spoke at more than one hearing on a topic, it is counted here as one oral comment. ^c General comments are counted in this row in addition to comments on possible alternatives.					

Table 12 - Comments on the IFQ transfers by stakeholder type

Topic	IFQ only	LA only	LA and IFQ combo			Orgs.	Other	Total
			1	2	3			
Commented on IFQ transfers^a	16	2	1	1	6	4	1	31
Prohibit transfer from LA to LAGC (No Action)	2	0	0	0	0	1	0	3
Allow transfer from LA to LAGC	13	2	1	1	6	3	1	27
Prohibit transfer from LAGC to LA	2	0	0	0	0	1	0	3
Uncertain or neutral preference on transfer	0	0	0	0	0	0	1	1
Notes: 1 = LA vessel and IFQ vessel 2 = LA vessel with IFQ permit on same vessel 3 = LA vessel with IFQ permit plus IFQ vessel or CPH “Other” = NGOM only, shoreside support, and other interested public. ^a General comments are counted in this row in addition to comments on possible alternatives.								

Table 13 - Comments on the IFQ transfers by home state, scallop fishery only

Topic	ME	MA	RI	NY	NJ	VA	Unk.	Total
Commented on IFQ transfers^a	3	8	1	1	11	2	1	27
Prohibit transfer from LA to LAGC (No Action)	0	1	0	1	0	0	0	2
Allow transfer from LA to LAGC	2	7	1	0	11	2	1	24
Prohibit transfer from LAGC to LA	1	0	0	0	1	0	0	2
Uncertain or neutral preference on transfer	1	0	0	0	0	0	0	1
^a General comments are counted in this row in addition to comments on possible alternatives.								

3.4 SCOPING PROCESS

There were six people who had comments about the scoping process:

- There were five comments (including three of the five anonymously written comments) that some fishery stakeholders are preventing others (through intimidation) from providing input on the LAGC possession limit increase.
- The scoping document should have included rationale for the potential changes it may consider.
- Praise for the NEFMC staff and Committee Chairman for taking the time to have site visits in scallop fishing communities in conjunction with the hearings.
- Analyze the economic impacts of Amendment 11 before proceeding. There is a concern that fishery now benefits a small number of “winners.”

3.5 OTHER COMMENTS LESS RELATED TO AMENDMENT 21

A few comments were outside the range of topics identified in the Amendment 21 scoping document:

- LAGC IFQ vessels should be able to request a waiver to be able to fish for scallops in state waters without using quota while keeping a federal permit on the vessel.
- Concern for the continued viability of the fishery due to offshore wind development.
- Support for NOAA expanding the dredge exemption areas to allow vessels to target scallops in high density areas and reduce tow times.
- The NEFMC should be helping reduce costs to enter the fishery.
- Concern that the observer system does not favor day-vessels.

4.0 COMMENT SYNTHESIS METHODS AND SOFTWARE

All comments were converted into text-searchable formats and imported into a *QSR NVivo 10* project for sorting and synthesis. Within the *NVivo* project, a “person node” was created for each person or organization who signed a letter or spoke at a hearing, and these nodes were organized by stakeholder type. Each person or organization was classified by demographic attributes such as home state, stakeholder type, comment type (oral and/or written), and number of comments

(Section 2.0). The text of each comment was assigned (i.e., coded) to the appropriate “person node.” “Theme nodes” were then created for each of the main issues raised in the comments. As the comments were carefully read, text that stated support for a given issue was highlighted and coded to the appropriate theme node. After all the comments were coded to persons and themes, the software was used to identify how many comments and people commenting supported a specific issue and the stakeholder type of the commenters, as reported in Section 3.0. To identify the rationale for supporting a given issue, the text coded to its respective theme node was read carefully.

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