REVISED (10/07/14)
DISCUSSION DOCUMENT
FW26 DRAFT FISHERY SPECIFICATIONS
09/30/14 Council Input Included

2.0 MANAGEMENT ALTERNATIVES UNDER CONSIDERATION

2.1 FISHERY SPECIFICATIONS

Specifications for the limited access fishery include DAS and access area trips as limited by the ACT for the limited access fishery and what areas are open to the fishery.

Specifications for the LAGC fishery include an overall IFQ allocation for vessels with LAGC IFQ permits, a hard TAC for vessels with a LAGC NGOM permit, and a target TAC for vessels with a LAGC incidental catch permit (40 pound permit).

The PDT met on August 26/27, 2014 and began to discuss potential specifications for Framework 26. In addition, PDT conference calls were held on September 10 and September 18 to continue developing strawman alternatives for the AP and Committee to consider.

2.1.1 Alternative 1 (No Action – Default measures from Framework 25)

Under No Action, the sub-ACL for the LA fishery would be 21,879 mt (48,234,778 lb). The specifications would include default measures approved in Framework 25 for FY2015 which are 75% of the projected DAS for that year. For full-time vessels that is equivalent to 17 DAS (75% of 23 DAS) and 7 DAS for part-time vessels. There are no access area allocations under No Action. These measures would remain in place until replaced by another action.

Under FY2015 default measures the LAGC IFQ allocation is 1,274 mt for vessels with a LAGC IFQ permit as well as LA vessels with a LAGC IFQ permit. This allocation is equivalent to 5.5% of the ACL projected for FY2015 from FW25. This alternative does not include any access area trips for LAGC IFQ vessels. On March 1, 2014 LAGC vessels will be allocated an individual quota based on default measures that will likely be different than the allocation LAGC IFQ vessels will ultimately be allocated under FW26. Similar to FY2013 and 2014, LAGC vessels will need to be aware that final allocations for FY2015 are likely to be different than allocations received on March 1, 2015 before FW26 is implemented.

No action for the NGOM hard TAC is 70,000 pounds and the target TAC for vessels with a LAGC Incidental permit is 50,000 pounds.

2.1.2 Alternative 2 (Specifications based on basic run using fishing mortality target principles in the FMP with no modifications to scallop access area boundaries)

This is the basic alternative the PDT generally begins with when identifying possible specification alternatives. Target catches in this fishery are driven by three principles developed as part of the "hybrid" overfishing definition approved in Amendment 15. The three main principles that are used in this FMP to set target catches for the fishery are:

1) fishing mortality in open areas cannot exceed Fmsy;
2) a spatially averaged fishing mortality target is limited to the value considered to the ACT for the fishery for all areas combined (open and closed areas); and
3) fishing mortality targets for access areas are based on a time-averaged principle, higher F in some years followed by closures or limited fishing levels in other years.

When these principles are applied to the estimated biomass in each area for FY2015 the allocations for full-time LA vessels are:

- ?? DAS for FT vessels in open areas (when open area F is set at 0.48); and
- Some level of access would be allocated in all three of the MA scallop access areas (Delmarva, Elephant Trunk and Hudson Canyon). A target F of ?? would be applied in all areas with sufficient exploitable biomass and lower growth potential.
- The remaining scallop access areas would be closed to the scallop fishery in 2015: Closed Area I, Closed Area II, and Nantucket Lightship.
- Total projected catch for Alternative 2 from all sources of catch (including set-asides and LAGC catch) is ???.
- Under 2016 default measures, the access areas would be closed in 2016 (but compensation trips could occur in the first 60 days) and DAS would be ???

The LA-sub ACL for this alternative is 23,653 mt (52,146,719 lb), and the LAGC IFQ sub-ACL under this alternative is 1,376mt. Both sub-ACLs are about 25% higher than the ACLs from 2014, and 8% higher than the default 2015 values. The PDT has not completed the final simulations for these alternatives, so the sub-ACT is not available yet. It should NOT be assumed that the ACT will be 25% higher than the ACT from 2014.

The maximum that the annual catch target can be set at is the catch associated with applying a fishing mortality rate of 0.34 in all areas, 0.04 below ABC/ACL, currently estimated at 0.38, to account for management uncertainty. But in reality some areas are closed and not available to the scallop fishery. Therefore, in practice, the ACT cannot exceed 0.34 overall, but target catches are driven by the three overall principles developed as part of the "hybrid" overfishing definition approved in Amendment (F in open areas cannot exceed Fmsy; F in access areas set annually at a level that results in F no higher than Fmsy when averaged over time; and the combined target F in open, access, and closed areas cannot exceed F associated with ACT, currently 0.34). In a given year, one of these three principles will be the constraining element that dictates what the overall target F can be for a particular specification alternative. For example, for FY2015 under this alternative, the constraining factor for setting projected catches is ???. Therefore, under this alternative the projected catch is limited by ???.

No action for the NGOM hard TAC is 70,000 pounds and the target TAC for vessels with a LAGC Incidental permit is 50,000 pounds.

2.1.3 Alternative 3 (Specifications based on basic run using fishing mortality target principles in the FMP with modifications to scallop access area boundaries)

Several different modifications to existing access areas are under consideration for various reasons. The primary reason is that 2014 survey results showed very large concentrations of small scallops in various parts of the resource area. Most scallops were two to three years old during the 2014 survey season (50-70mm), so they may be susceptible to scallop fishing gear in FY2015 (typically about 100mm). There were also even smaller scallops observed in the surveys this year (i.e. south of Long Island), but those scallops were under 30 mm (0-1 year old scallops); therefore, it is not as critical to consider new rotational closures in those areas until the scallops are larger.

The current thinking is that multiple options could be selected together. For example, the final specification alternative could include several modification options for different areas. The PDT has not yet decided how to analyze this many options in terms of simulations and projections. It may be too complex and time consuming to run full projections for every combination. But the idea is that more than one option could be selected within this alternative. For example, the final Alternative 3 may include all three options, or just one or two of the area modifications. In addition, it may be possible to combine some of the area modifications with Alternative 4, lower fishing mortality target for Mid-Atlantic access areas, i.e. a "combo" run was completed that includes the CA2 scallop access area extension, NL scallop access area extension, and lower F in MA access areas.

Under this alternative:

- ?? DAS for FT vessels in open areas (when open area F is set at 0.48); and
- Some level of access would be allocated in all three of the MA scallop access areas (Delmarva, Elephant Trunk and Hudson Canyon). A target F of ?? would be applied in all areas with sufficient exploitable biomass and lower growth potential.
- The remaining scallop access areas would be closed to the scallop fishery in 2015: Closed Area I, Closed Area II, and Nantucket Lightship.
- Total projected catch for Alternative 3 varies slightly depending on the sub-options selected, overall it is about ??? (including set-asides and LAGC catch).
- Under 2016 default measures, the access areas would be closed in 2016 (but compensation trips could occur in first 60 days), and the DAS would be XX

Candidate Modifications are provided in Figure 1, Figure 2 and Figure 4.
Figure 3 and Figure 5 overlay the scallop access area modifications with scallop distribution data from 2014 surveys.

The LA-sub ACL for this alternative is the same as Alternative 2: 23,653 mt (52,146,719 lb), and the LAGC IFQ sub-ACL under this alternative is 1,376mt. The PDT has not completed the final simulations for these alternatives, so the sub-ACT is not available yet. It should NOT be assumed that the ACT will be 25% higher than the ACT from 2014. ACT is based on available

scallops, and many of the scallops currently in the survey are small and/or in closed areas; neither available to the fishery in 2015.

No action for the NGOM hard TAC is 70,000 pounds and the target TAC for vessels with a LAGC Incidental permit is 50,000 pounds.

2.1.3.1 Option 1 – Modification to access area in Closed Area II

Option 1 is an extension of the scallop access area in Closed Area II to include concentrations of small scallops that are near existing boundaries of current access area. This option is limited in that it only extend into "open areas" to the scallop fishery; the option does not extend into any closed areas, and does not reduce the size of any current scallop access areas. The PDT may consider modifying these areas again in a future action; for example, if closed areas for EFH or groundfish are modified in another action. But this action is only considering extensions of current scallop access areas into adjacent open areas. See Figure 1 and Figure 3.

The size of this option is 4,203 square nautical miles. The status quo scallop access area within CA2 is 1,025 square nautical miles, and the extension is 3,178 square nautical miles. The boundaries for this option are in Table 1.

Vessels are currently prohibited from transiting through the scallop access area within Closed Area II. This is the only scallop access area where transitting is prohibited, primarily because it is far offshore and abuts the US-Canada maritime border. Therefore, the need to transit through the area to get to port from primary scallop fishing grounds is minimal.

Table 1 – Potential boundaries of Closed Area II scallop access area extension

	Latitude	**Longitude**
Point 1	41 30' N	67 20' W
Point 2	41 30' N	Intersection of 41 30' N and the US-Canada Maritime Boundary, approx. 66 34.73'W
Point 3	40 30' N	Intersection of 40 30' N and the US-Canada Maritime Boundary, approx. 66 34.73'W
Point 4	40 30' N	67 20" W

2.1.3.2 Option 2 – Modification to access area in Nantucket Lightship

Option 2 is an extension of the scallop access area in Nantucket Lightship to include concentrations of small scallops that are near existing boundaries of current access areas. This option is limited in that it only extends into "open areas" to the scallop fishery; the option does not extend into any closed areas, and does not reduce the size of any current scallop access areas. The PDT may consider modifying these areas again in a future action; for example, if closed areas for EFH or groundfish are modified in another action. But this action is only considering extensions of current scallop access areas into adjacent open areas. See Figure 2 and Figure 3.

The size of this option is 1,046 square nautical miles. The status quo scallop access area within Nantucket Lightship is 888 square nautical miles, and the extension is 158 square nautical miles. The boundaries for this option are in Table 2.

Vessels are currently allowed to transit through the scallop access area within Nantucket Lightship. If the area is extended in this action to include the relatively small area to the east of the access area, transiting would also be permitted in that extension.

Table 2 – Potential boundaries of Nantucket Lightship scallop access area extension

	Latitude	Longitude
Point 1	40 33' N	69 00' W
Point 2	40 33' N	68 48' W
Point 3	40 20' N	68 48' W
Point 4	40 20' N	69 00' W

2.1.3.3 Option 3 – Modification to Elephant Trunk (prohibit access in northwest corner) (2 options considered)

Option 3 is different in that this option proposes to close areas *within* current scallop access areas, or a temporary prohibition to fish in a subset of a current scallop access area. Option 3 is confined to Elephant Trunk. The main alternative developed is a seven ten minute square area in the northwest corner of the access area. The Scallop Committee also wanted the PDT to consider a smaller area, six ten minute squares only, if the larger area contained a large amount of exploitable biomass for FY2015. See Figure 4.

The size of the larger option (7 ten minute square area) within ETA is 549 square nautical miles. The smaller, 6 ten minute square area is about 471 square nautical miles. The Elephant Trunk access area is 1,571 square nautical miles, so the larger area is about 35% of the access area, and the smaller area is about 30% of the access area. The boundaries for these options are in Table 3 and Table 4.

Vessels are currently allowed to transit through all Mid-Atlantic scallop access areas. If a subarea within ETA is closed in this action the Council should clarify whether scallop vessels should be allowed to transit through the closed area within the access area to and from port.

Table 3 – Potential boundaries of 7 ten minute square closure within Elephant Trunk scallop access area

	Latitude	Longitude
Point 1	38 50' N	74 20' W
Point 2	38 50' N	73 40' W
Point 3	38 40' N	73 40' W
Point 4	38 40' N	73 50' W
Point 5	38 30' N	73 50' W
Point 6	38 30' N	74 20' W

Table 4 – Potential boundaries of 6 ten minute square closure within Elephant Trunk scallop access area

	Latitude	Longitude
Point 1	38 50' N	74 20' W
Point 2	38 50' N	73 50' W
Point 3	38 30' N	73 50' W
Point 4	38 30' N	74 20' W

Option 3 is expected to reduce incidental mortality on small scallops within the access area and increase overall yield production from the access area by concentrating effort in deeper waters first (Figure 5). Scallops grow faster in shallow waters and the overall growth potential is lower for scallops in deeper waters. Therefore, concentrating effort in deeper waters first will take advantage of the differential growth patterns for scallops by depth and is expected to increase overall yield from the area compared to opening the entire area at once. Previous openings have shown that vessels tend to fish in areas with highest concentrations first, but shallow areas are generally targeted first since they are closer to shore and scallops grow faster in more shallow waters. And in some areas, relatively large scallops are in some shallow areas, but they are younger than scallops farther offshore, and have more potential yield left compared to older scallops farther offshore.

For Option 3 it will be important to clarify how the fishing mortality rate should be set in the remaining area. For example, if all of ETA was open in 2015 and an overall F of 0.4 was applied to the area maybe it would provide about 6 million pounds of catch. However, if Option 3 was selected and the northwest corner was closed in 2015, FW26 could either:

A) still apply 0.4 to the rest of ETA, which would provide less catch in 2015 since some of the area would be closed, say 5 million pounds; or

B) a higher F rate could be applied in remaining parts of ETA not closed under Option 3 to something higher, i.e. 0.5 to maintain projected catch from that area at 6 million pounds for 2015.

Each approach would have different impacts on catch in 2015, and beyond. Note that the scenarios have been run assuming B above; higher F rate is applied in the area left open within ETA to maintain the same projected catch from the access area if there was no closure adopted.

Figure 6 is an analysis of projected growth rates by ten minute square and exploitable biomass estimates for FY2015. In general, the larger area proposed for ETA, Option 3 with seven ten minute squares included, contains approximately 10% of the exploitable biomass that is within all three MA access areas, and 15% of the exploitable biomass in EAT only. For HC options, the HC north as well as the small triangle on the western boundary combined contain about 7% of the total exploitable biomass for all three MA areas combined, and 34% of exploitable biomass in HC. If the two areas are combined (larger one in ETA and two subareas in HC), about 17% of all MA AA exploitable biomass are within the boundaries. If the areas were closed and the same catch was desired form access areas, F in the remaining portions would need to be increased about 20%.

Figure 1 – Potential alternatives for GB access area modification – Closed Area II – Option 1

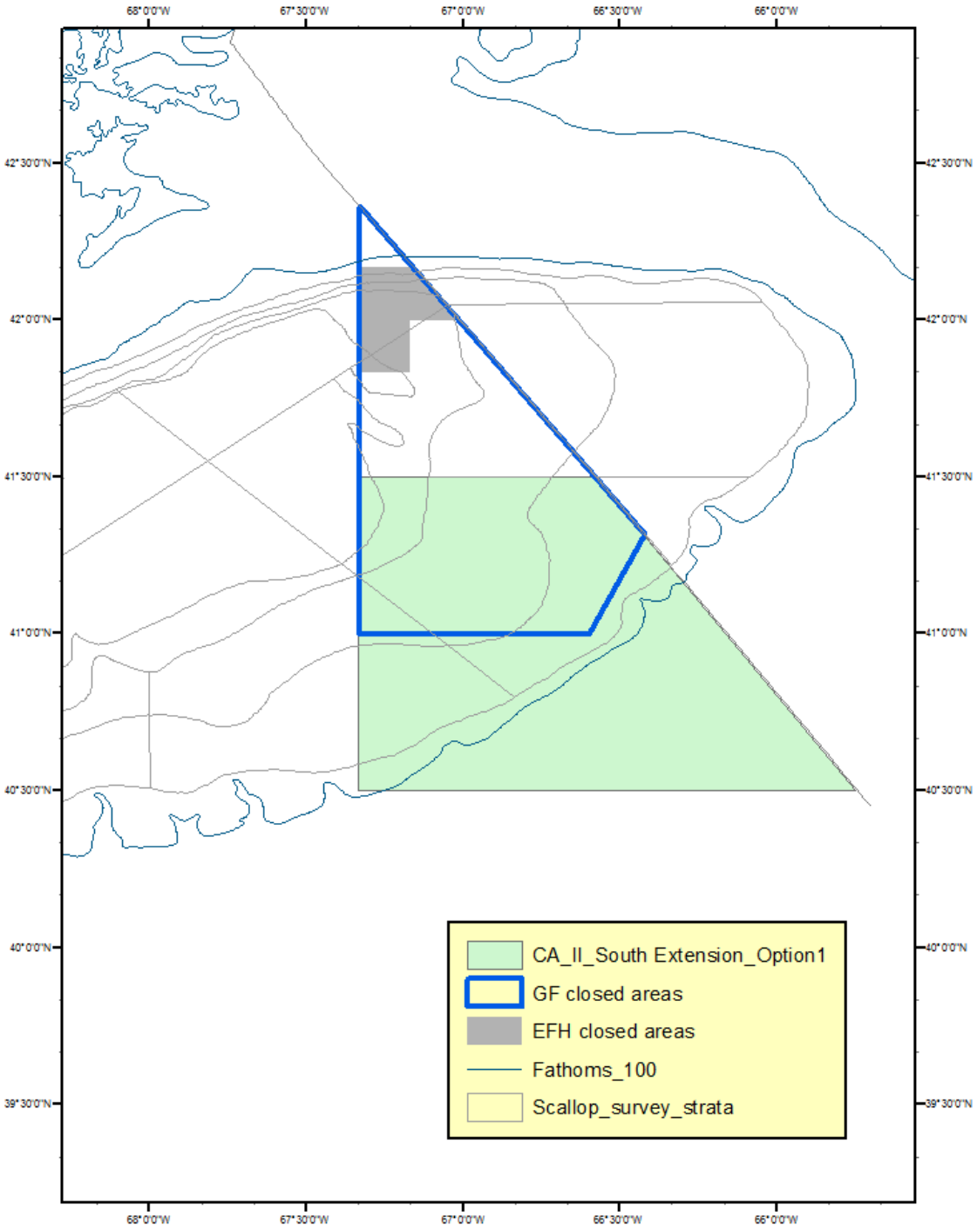


Figure 2 - Potential alternatives for GB access area modification – Nantucket Lightship – Option 2

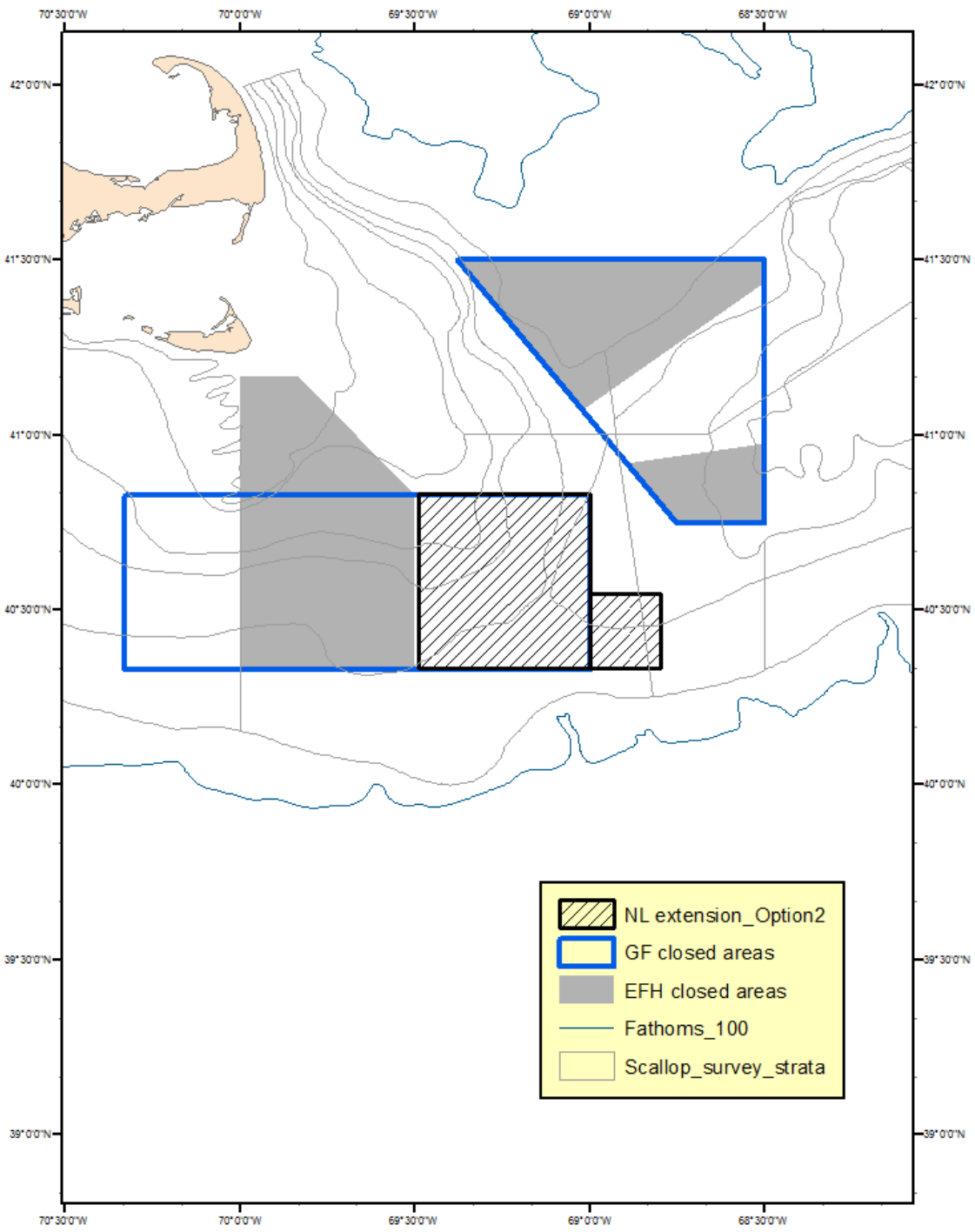
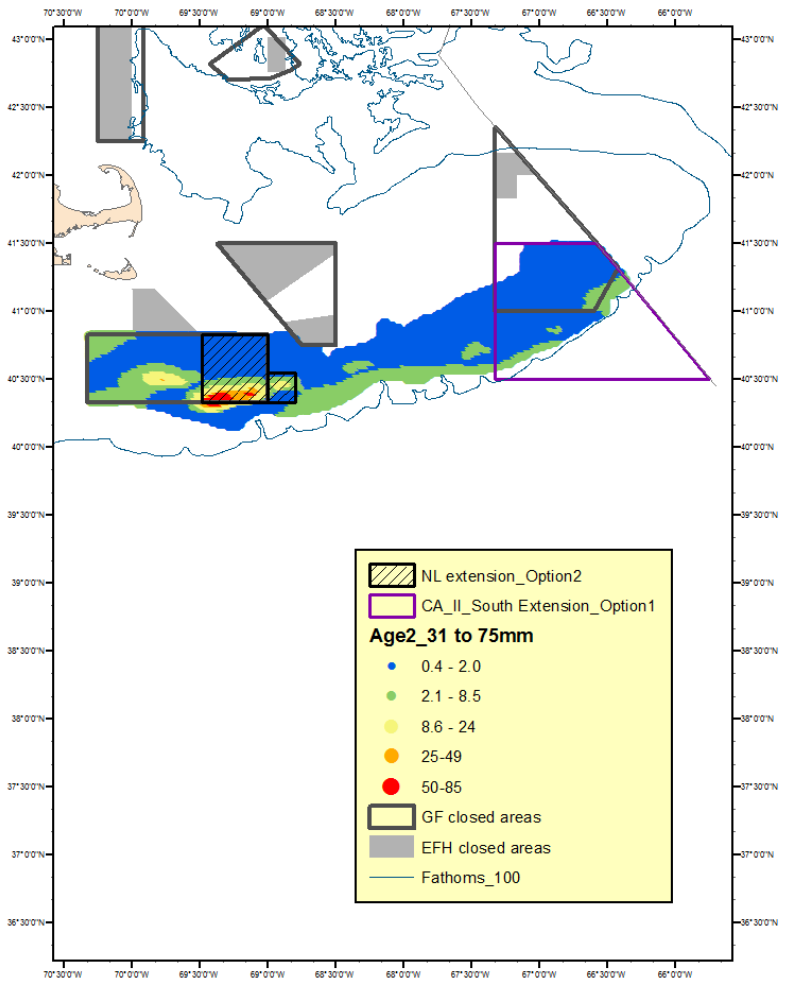


Figure 3 - Potential alternatives for GB access area modifications with 2014 survey data (Habcam on left and SMAST on right)



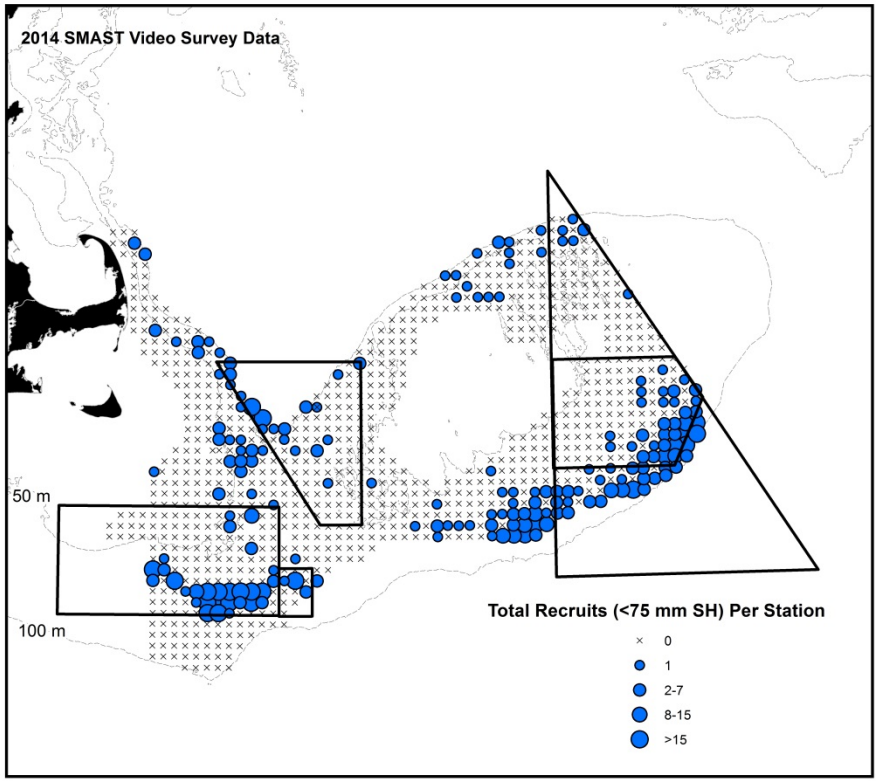


Figure 4 - Potential alternatives for MA access area modification – ETA (2 options) – Option 3

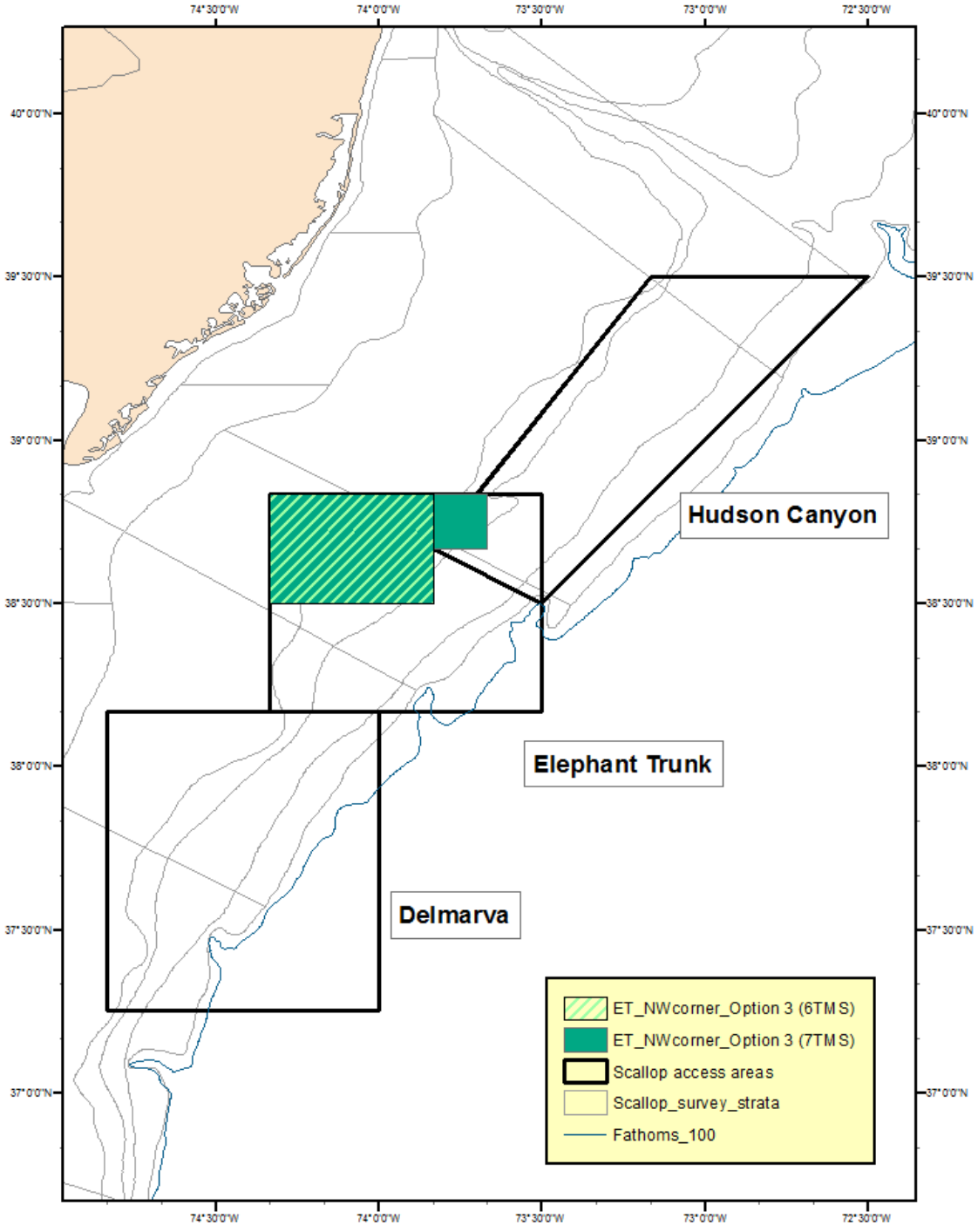
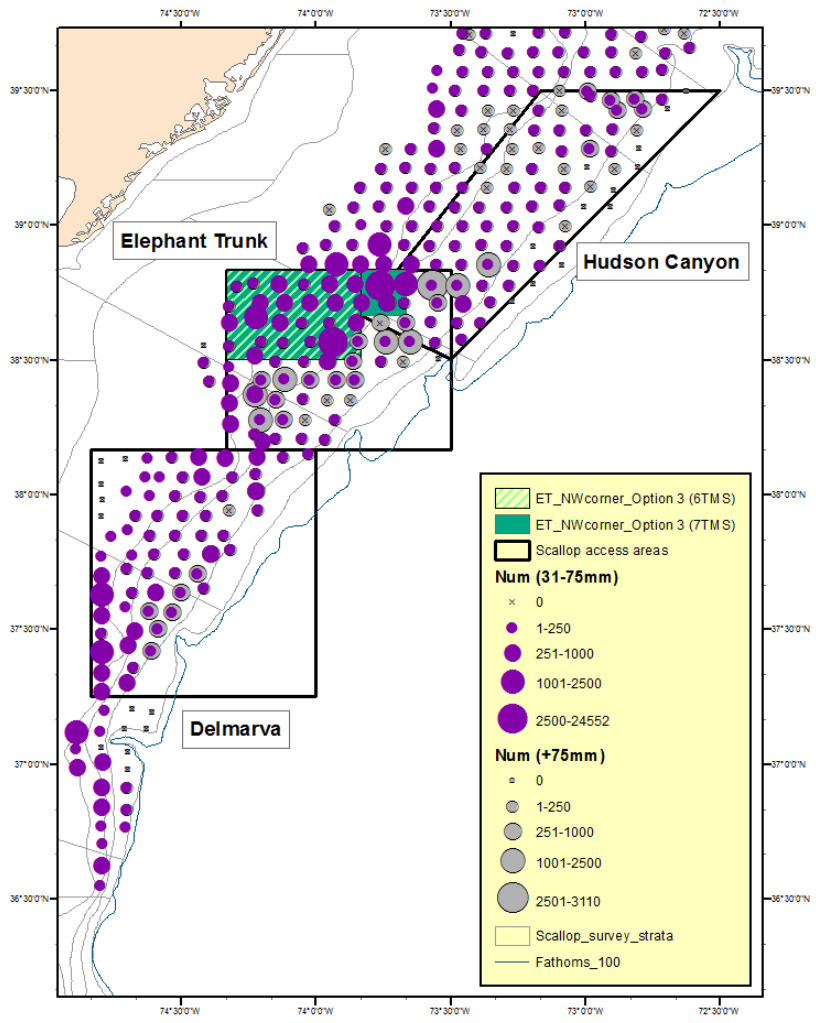


Figure 5 - Potential alternatives for MA access area modification with 2014 survey data (VIMS on left and SMAST on right)



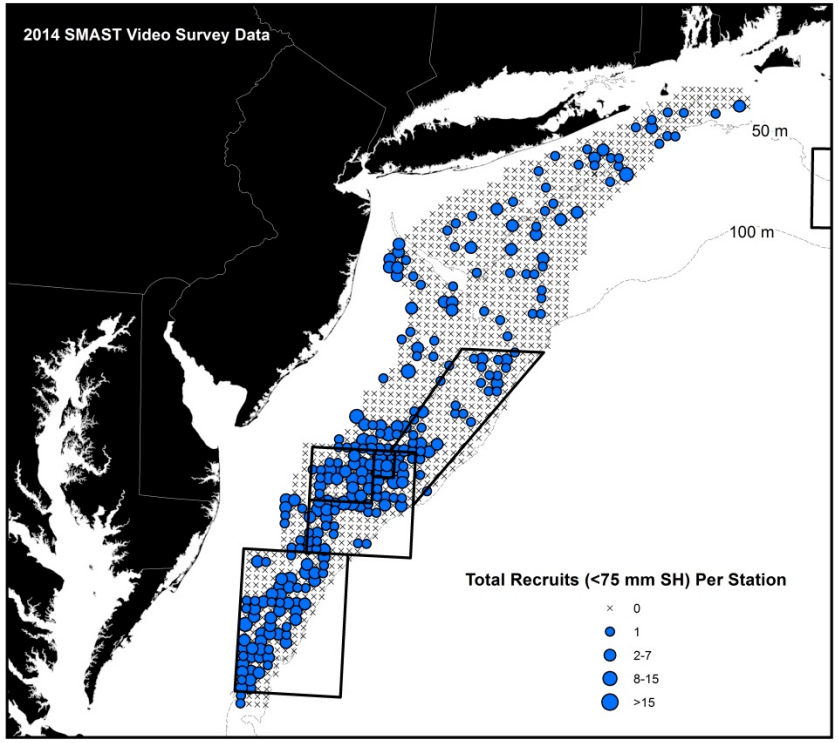
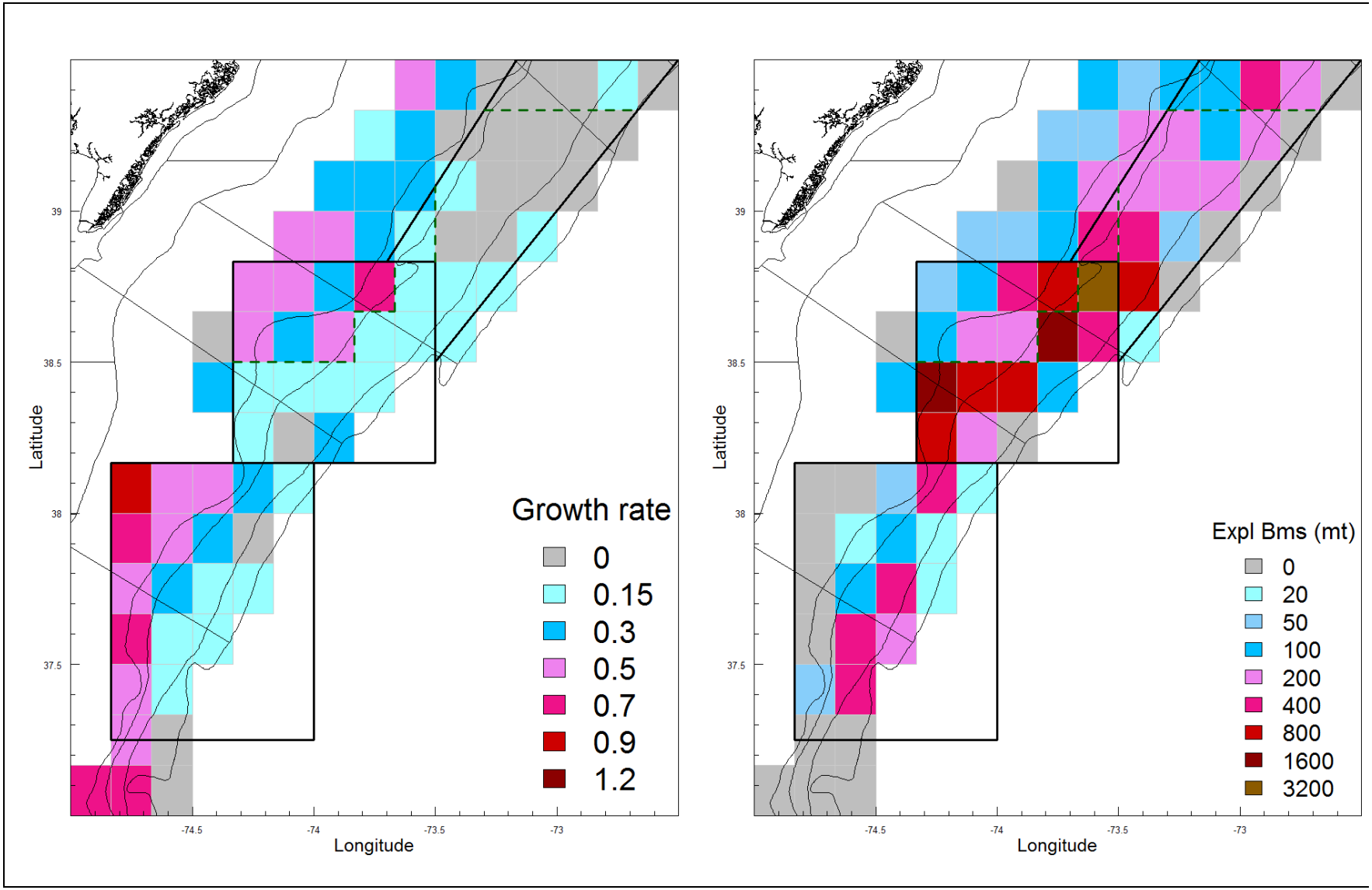


Figure 6 – Projected growth rates and exploitable biomass per ten minute square using 2014 VIMS data



2.1.4 Alternative 4 (Specifications based on basic run using fishing mortality target principles in the FMP, <u>but reduce fishing mortality target for MA access areas lower than allowable limits to reduce incidental mortality on small scallops in those areas</u>)

The same overall principles would be used to set fishing targets for the fishery; however, the allowable fishing mortality limit used to set allocations for MA access areas would be reduced by some amount to reduce impacts on small scallops observed in those areas. For example, if the time averaged fishing mortality rate for these areas is allowed to be 0.50, the PDT will instead limit the fishing mortality to something lower, i.e. 0.45. This reduction in fishing mortality targets would translate into fewer trips and lower catch allowed to be removed from the area. Vessels would be permitted to fish individual trips throughout the access area, and there would be no restricted areas within the access areas. Vessels would be limited to one access area only per allocated trip; the intent of this alternative was to keep things simple and not adopt subarea closures or allocate trips that could be fished in any MA access area. Therefore, this alternative *cannot* be combined with the allocation alternative that would allocate trips that could be fished in all three access areas (Alternative 3.2).

If it becomes clear that closing subareas within access areas is not practical and would logistically be difficult for the scallop industry, this alternative would still reduce impacts from incidental mortality on small scallops within access areas. One potential concern with some of the options under consideration for Alternative 3 (Option 3) that would restrict access in portions of the MA access areas is vessel crowding. If the sub-area closures are relatively large, there may be a large number of vessels fishing in a relatively small area. In addition, it may be problematic if subarea closures are between areas vessels are fishing and port of landing, a vessel may have to steam around a closure to get to port rather than transverse through a closed area within an access area.

<u>Note that the run completed for this alternative is a lower F in MA access areas, as well as closing the extension around CA 2 and NL (Alternative 3 – Options 1 and 2) (combo run).</u>

Under this alternative:

- ?? DAS for FT vessels in open areas (when open area F is set at 0.48); and
- Some level of access would be allocated in all three of the MA scallop access areas (Delmarva, Elephant Trunk and Hudson Canyon). A target F of ?? would be applied in all areas with sufficient exploitable biomass and lower growth potential.
- The remaining scallop access areas would be closed to the scallop fishery in 2015: Closed Area I, Closed Area II, and Nantucket Lightship.
- Total projected catch for Alternative 4 is about ??? (including set-asides and LAGC catch).
- Under 2016 default measures, the access areas would be closed in 2016 (but compensation trips could occur in first 60 days), and the DAS would be XX

The LA-sub ACL for this alternative is the same as Alternative 2 and 3: 23,653 mt (52,146,719 lb), and the LAGC IFQ sub-ACL under this alternative is 1,376mt. The PDT has not completed the final simulations for these alternatives, so the sub-ACT is not available yet. It should NOT

be assumed that the ACT will be 25% higher than the ACT from 2014. ACT is based on available scallops, and many of the scallops currently in the survey are small and/or in closed areas; neither available to the fishery in 2015.

No action for the NGOM hard TAC is 70,000 pounds and the target TAC for vessels with a LAGC Incidental permit is 50,000 pounds.

2.2 ALLOCATION OF LAGC IFQ TRIPS IN ACCESS AREAS

The LAGC IFQ fishery is allocated a fleetwide total number of access area trips. Individual vessels are not required to take trips in specific areas like access area trips allocated to the limited access fishery. Instead, a maximum number of trips is identified for each area and once that limit is reached, the area closes to all LAGC IFQ vessels for the remainder of the fishing year. The level of allocation can vary and is specified in each framework action. This framework action is considering four options for allocating fleetiwde LAGC IFQ trips in access areas in FY2015.

2.2.1 Option 1 – No Action – No access area trips allocated for LAGC IFQ vessels

Access area trips are set by framework action, and if this action does not specify the number of trips per area for LAGC IFQ vessels, those vessels would not be able to fish in scallop access areas in FY2015. They would need to harvest all IFQ from open areas.

2.2.2 Option 2 - Allocate fleetwide trips equivalent to 5.5% of catch per access area open to the fishery

This alternative would allocate 5.5% of the access area TAC per area to the LAGC fishery in the form of fleetwide trips. Vessels would still be restricted to the possession limit of 600 pounds. Once the fleetwide max is projected to be fished, NMFS would close that access area to LAGC IFQ vessels for the remainder of the 2015 fishing year. Total removals from MA access areas is expected to be ??? in FY2015. An allocation of 5.5% of that amount is equivalent to ??? pounds, or ?? 600 pound trips. See Table ??? for a summary of the trips that would be available to the LAGC fishery under this option.

2.2.3 Option 3 – Allocate fleetwide trips equivalent to 2 million pounds from access areas open to the fishery

The Scallop Advisors developed this option that was ultimately included for consideration by the Council at the September Council meeting. This option would increase the overall access LAGC vessels would have to areas that are projected to have more productive fishing areas in 2015. Two million pounds is about 65% of the total LAGC IFQ allocation for 2015 (1,377 mt or just over 3 million pounds). To be clear, this option would not directly affect the catch allocated to limited access (LA) vessels from access areas in 2015, rather it would be available catch on top of the LA allocation from access areas. See Table ??? for a summary of the trips that would be available to the LAGC fishery under this option.

2.2.4 Option 4 – Allocate fleetwide trips to LAGC vessels in access areas equivalent to the same proportion of access limited access vessels have in access areas compared to open areas

The Scallop PDT developed this alternative to consider an option that would provide about the same level of access for LA and LAGC vessels in access areas in 2015 in terms of the total proportion of catch for the year. For example, the total ACT for the LA fishery in 2015 is projected to be ???, about ?? % from access areas and ?? % from open areas. If the same split is considered for the LAGC fishery, ??% from access areas and ??% for open areas, that would come out to ?? trips from access areas (?? Pounds in access areas out of the total allocation of 3 million pounds). To be clear, this option would not directly affect the allocation of access for LA vessels from access areas in 2015, rather it would be available catch on top of the LA allocation from access areas. See Table ??? for a summary of the trips that would be available to the LAGC fishery under this option.

ANY OTHER IDEAS??

2.3 RESTRICT CREW LIMITS IN MID-ATLANTIC ACCESS AREAS AS AN ADDITIONAL MEASURE TO REDUCE INCIDENTAL MORTALTIY ON SMALL SCALLOPS OPEN IN 2015

In addition to closed areas there are other measures that reduce incidental mortality on small scallops. In the past when access areas have been opened when small scallops are known to be in the area specific measures are considered to help reduce those potential impacts. For example, in 2014 when Delmarva was opened on a limited basis a handful of measures were included to further reduce impacts on small scallops within the area. The Scallop Committee considered a range of ideas (i.e. crew limits, prohibition on RSA compensation fishing, seasonal restrictions, and gear modifications). Ultimately, the only alternative included for consideration in this action is implementing a crew limit in all MA access areas.

Limited access scallop vessels have crew size limits when fishing in open areas, but there are no crew size limits when fishing in access areas since there is a possession limit. However, because there are concentrations of small scallops in all three of the MA access areas, especially in shallow portions of ETA, if the areas open under this action, a crew limit could help reduce the potential for highgrading and mortality on smaller scallops from incidental mortality. This alternative would implement the same crew limits that exist for open areas: 7 individuals per LA vessel, and if a vessel is participating in the small dredge program it may not have more than five people on board.

3.0 ALLOCATION METHOD FOR MID-ATLANTIC ACCESS AREA TRIPS IN 2015 ONLY

3.1 NO ACTION (LOTTERY ALLOCATION)

Under this alternative 2015 Mid-Atlantic access area trips would be allocated to LA vessels similar to how trips have been allocated in the past. If there is enough biomass in a particular access area to provide one trip per vessel, each FT LA vessel would receive a trip in that area. However, if there is less catch available per area than the amount needed to allocate one trip per area to all FT LA vessels, a total number of trips would be calculated per area, and individual trips would be allocated by lottery. For 2015, there would be a total of ?? trips into the ETA, ??? in Delmarva, and ??? in Hudson Canyon. All trips will have a possession limit of ?? pounds. The PDT calculates the total number of trips available, and if a lottery is needed, NMFS would complete the lottery and include the results as an appendix in the framework to provide more time for vessels to potentially trade trips.

Part-time vessels would receive ?? trips at ?? pounds, which could be fished in either the ETA, Delmarva, or HC.

3.2 FLEXIBILE ALLOCATION FOR MID-ATLANTIC ACCESS AREA TRIPS

The three MA AA areas would be considered one area using their existing boundaries for FY2015. Vessels would declare a MA AA trip and could freely fish inside all three areas on the same trip. Under this alternative, FT vessels would receive XX trips at XX lbs, and PT vessels would receive XX trips at XX lbs, and these trips could be fished in any of the MA AAs (and across multiple AAs on a single trip.)

This would potentially require a new VMS code to identify all MA AAs under one code.

This alternative would be the most flexible option for a vessel to land its scallops on its own terms. A vessel would not be limited to a particular area and could fish in multiple MA AAs on the same trip. Under this alternative you may lose the ability to handle inseason monitoring of specific access areas and you may lose a clear historical perspective on how and where scallops were caught. Under this option there is potentially increased risk of fishing harder in one access area.

4.0 ADJUSTMENTS TO PROVISIONS RELATED TO ALLOCATING AND MONITORING ACCESS AREA TRIPS

Although the plan currently allocates access area trips with specific possession limits, vessels can take as many trips as they need to in order to fully harvest those possession limits. Ultimately, although the plan discusses allocations in terms of “trips”, what is actually allocated to vessels in access areas is a poundage. This has been the case since Framework 17 (which allowed for all trips to be broken without penalty, and which went into effect on October 2005). Furthermore, in Framework 25, any vessel with unharvested Closed Area 1 pounds are allowed to land those pounds from the area in a future fishing year. Although the method of allocating these trips has changed over time, the “trip-level” terminology and monitoring has not, which results in some level of burden on the industry and NMFS. To make the administrative process mirrir how the

fishery actually works, the PDT developed several alternatives to consider changes to policies and reporting requirements for access area trips. If adopted, these changes could remain in effect after 2015 and would improve monitoring and reduce burdens on the Agency and vessel owners by replacing the broken trip provision with prelanding reports.

4.1 NO ACTION (TRIP ALLOCATIONS CONTINUE AND BROKEN TRIP PROCEDURES)

Under this alternative, vessels would continue to be allocated access area trips with associated possession limits, which could actually be taken across multiple trips. For example, if vessels receive 2 trips at 18,000 lb into the Mid-Atlantic access areas, although they would be allowed to land the entire 36,000 lb during the fishing year under multiple trips, they would still need to follow current broken trip procedures. That means that vessels would continue to report the termination of access area trips through VMS, submit broken trip adjustment forms to the Regional Office, and wait for the Regional Office to process the requests and issue compensation trips. In addition, vessels would continue to have to break a trip (meaning they would have to cross the VMS demarcation line, even if they had no intention of landing any scallops on that trip) and apply for a compensation trip in the last 60 days of a given fishing year in order to carry over that trip into the first 60 days of the following fishing year.

4.2 REMOVE BROKEN TRIP PROCESS AND REPLACE WITH PRELANDS

Under this alternative, vessels would be given a simple poundage allocation in an access area, instead of referring to it as a trip allocation with associated pounds that can actually be fully harvested under multiple trips. For example, in a given fishing year, a vessel receives an 18,000 lb allocation in Delmarva and an 36,000 lb allocation in Hudson Canyon, which can be harvested on multiple trips, but trips would have a possession limit of 18,000 lb. Let's take another example – if Alternative 3.2 is adopted, which would consider all three access areas in the Mid-Atlantic to be one area for 2015 – vessels would be allocated 54,000 lb, which could be fished on multiple trips at 18,000 lb/trip. Trip exchanges would still occur, but we would just say that the only thing you can exchange is full-possession limits between areas. Notice that none of this changes in any way how the fishery currently operates, but it is using terminology that is more in line with how the fishery actually functions.

What would change would be how broken trips are handled – and this change would alleviate burden on both vessel operators and NMFS. If this alternative is adopted, for each trip, vessels would submit a preland through their VMS unit to indicate pounds caught. If you were unable to land your allocation on a single trip, you could go out and fish it on multiple trips without having to request a compensation trip. NMFS would match dealer records with access area trips and pounds and deduct pounds from a vessel's total allocation. NMFS's accounting of access area pounds could be available as part of the information available on Fish-on-Line.

If this option is selected, the Council would need to decide how to handle carryover access area trips. Because vessels would not have to take any action to carryover trips (i.e., no need to go out and break a trip in the last 60 days of a fishing year), all unlanded pounds from access areas could be allowed to be carried over, or the Council could consider only allowing a percentage of the access area trips (see options drafted below). Recall that part of the reason there is buffer between the limited access fleet's sub-ACL and sub-ACT is to account for carryover pounds from

access area trips and DAS. To date, the sub-ACL has not been exceeded, but the Council could choose to be more precautionary by limiting the amount of carryover allowed from access area trips.

4.2.1 Option 1: Require vessels cross the VMS demarcation line and submit a preland within last 60 days of the fishing year in order to fish those pounds in the first 60 days of the following fishing year.

This option would be status quo -- there is already the potential to carryover all unused access area pounds into the next year, but vessels would still be required to take action (i.e., cross demarcation line and submit a preland or a broken trip form) in the last 60 days that an access area in open in a given fishing year in order to receive the carryover pounds for that area. *Pounds would still be required to be landed within the first 60 days of the next fishing year.*

4.2.2 Option 2: Allow for all unlanded access area pounds to be carried over without any action from vessels

This would be similar to status quo because there is already the potential to carryover all unused access area pounds into the next year, but vessels would no longer be required to break a trip in the last 60 days of a fishing year. Pounds would still be required to be landed within the first 60 days of the next fishing year. Under this option a vessel would not have to actually go out in their vessel to physically break a trip by crossing the VMS demarcation line.

Is it still important to keep the first 60 day provision in place? Should carryover be allowed to be fished anytime during the following year as long as the area remains open?

From NERO Monitoring Page – TAC in million pounds for each access area compared to LA catch per access area

*Note – there is no TAC per area – this value calculated by taking #LA vessels * possession limit*

Access Area	2012	2013	2014*
Closed Area I	5.89	1.53	Closed
	4.99 (85%)	0.49 (32%)	Closed
Closed Area II	5.89	2.37	2.36
	5.51 (94%)	2.41 (102%)	1.79
Nantucket Lightship	3.06	1.51	1.39
	2.94 (104%)	1.86 (124%)	0.84
Hudson Canyon	8.82	2.73	Closed
	8.83 (100%)	2.79 (102%)	Closed
Elephant Trunk	Open Area	Closed	Closed
	Open Area	Closed	Closed
Delmarva	0	Closed	3.76
	0.20	Closed	2.36
Total AA	23.66	8.14	7.51
	22.47 (95%)	7.55 (93%)	5.07

**** Preliminary – FY2014 is not complete yet. Data through September 10, 2014***

POTENTIAL PDT APPROACH FOR ANALYSIS OF SPECIFICATION ALTERNATIVES

QUANTITATIVE ANALSIS FOR SPECS – SAMS RUNS – **7 separate runs**

1. **Direct Specification alternatives**
   a. No Action (default DAS – 17 FT das and zero access area trips)
   b. Base run (no modifications to AA boundaries, no GB trips, MA access areas and OA DAS based on three principles)
   ~~*c. Modify CA2, no GB trips, MA AA and OA DAS based on three principles*~~
   d. 2 modifications - Modify CA2 and NLsmall, no GB trips, MA AA and OA DAS based on three principles
   e. 3 modifications - Modify CA2, NL small, ETA 7TMS, no GB trips, MA AA and OA DAS based on three principles
   ~~f. Reduced F in MA areas – same as base run (option b) but reduce F in all 3 MA access areas to reduce impacts on small scallops~~
   g. Combo – Same as Reduced F (option f) but also close CA2 and NL area (no closure in ETA)

2. **Measure to increase access to productive areas for LAGC (run h)**
   Same as Option e above, but increase F in MA access areas to provide more catch for LAGC fishery – up to 2 million pounds. Qualitatively we will need to get into potential fishery behavior impacts: will vessels temporarily move to NJ, impacts on lease prices, less dayboat product in north, etc.

3. **Status Quo (FY2014)**
   This is NOT an alternative in FW26. This run would be completed for analysis purposes only. It is useful to compare projected catches for 2015 to the 2104 fishing year. If time permits, a separate run will be done that includes similar catch levels to 2014.

QUALITATIVE ANALYSIS FOR SPECS
- Need to compare ETA 6 TMS and 7TMS somehow – focus on estimates of exp biomass per TMS and growth per TMS.

- Need to decide how we are going to analyze how F set for ETA if NW corner closed – are we just going to increase F in remaining areas – or are we going to reduce removal from the area? AP was clearly supportive of maintaining the same catch from the area if NW corner closed (increase F in remaining area to equal removal if the area was open). So maybe document should not even consider keeping F at the same level with lower catches.

OTHER SPECIFICATION ISSUES
4. Crew Limit - Approach could be the same as in FW25
5. Allocation by lottery versus flexible allocation
   a. Pros/cons
   b. New monitoring requirements
   c. Can we look at this quantitatively at all – what if all effort goes in ETA?