

Public Comments Summary Snapper Grouper Regulatory Amendment 22

A public hearing for Regulatory Amendment 22 was held on November 6, 2014 via webinar. Myra Brouwer, Council staff, gave an overview presentation of the actions and alternatives included in the amendment and the expected biological and socio-economic impacts. While attendance was encouraging (over a dozen participants), there were no comments submitted on the webinar. Written comments were accepted through November 14, 2014.

Below are comments that were offered for the Council's consideration:

- Use the poundage of gag currently allocated to account for post-quota bycatch mortality (PQBM) as a bycatch allowance once the directed commercial quota has been landed. Fishermen would be allowed a 50-pound allowance.
- The current PQBM for gag was grossly overestimated. Before any adjustments are made to the gag ACL, the Council should consider a more realistic estimate of discard mortality.
- Establish a 500,000-pound wreckfish quota with a 2,000-pound trip limit for commercial snapper/grouper permit holders that do not own shares in the fishery.
- Consider buying back wreckfish shares that are being sold and putting in an open access quota.
- Consider habitat enhancement to improve the health and abundance of the gag and wreckfish stocks.
- Support for Council's preferred alternatives under Actions 1 & 3 (gag & wreckfish ACLs).
- Recommend Alternative 1 (No Action) for Action 2 (modification to gag bag limit)
- Recommend a reduction in the recreational allocation for wreckfish to 1% of the total ACL.

Public Comments Regarding Regulatory Amendment 22

I am Chris McCaffity. My comments will focus on consumer quotas for both species and how these commercial fisheries could be managed to produce more seafood with less waste.

The 27,218 pounds of Gag Grouper quota that was allocated to projected post closure dead discards should be used for a 50 pound by-catch allowance after the primary quota has been landed. This would help avoid prolonged closures while following the Magnuson-Stevens Act mandates to limit waste and make efficient use of our resources. Fishermen should be encouraged to use descending devices when releasing illegal fish that are too bloated to swim. This would improve survival rates of regulatory discards which should result in lower discard mortality allocations and higher quotas. We should also think about producing more Gag Grouper through hatcheries and habitat enhancement.

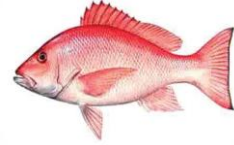
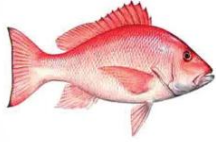
Consumers should be allowed to access Wreckfish from more than just the few shareholders that now own this public resource. The council should establish a 500,000 pound Wreckfish quota with a 2,000 pound trip limit for commercial snapper/grouper permit holders that do not own catch shares. The council should look at ways to buy back shares that are being sold and put that poundage into the open access quota. Allowing all permit holders to sell these fish would take pressure off of other species while providing consumers more access to this seafood. Properly built and placed artificial reefs could help increase the bio-mass of Wreckfish and allow more harvest.

Commercial fishermen should be allowed to decide how our share of each Total Allowable Catch will be managed with a 2/3 majority vote from participating permit holders.

Thank you for thinking about these solutions. Please contact me if you have any questions or are interested in discussing these important issues. freefish7@hotmail.com

To council members: Please read and discuss. Before more adjustments are made to comm acl, the current acl should be increased to account for the over estimation of dead discards{gag} during early closure which were deducted last year. When you look at the duration of the early closure (6 weeks) and the comparable low catch of RG and Scamps during early closure, you should realize 27,218# of dead discards was by far over estimated. When the deduction was estimated, the model that was used had to estimate the duration of early closure along with the amount of fishing effort during this time. The actual time and effort was affected by bad weater resulting in an over estimation of dead discards. . The same thing is in place this year making the gag acl lower than what it should be. It comes to a point now when these deductions for dead discards during early closure are actually causing an early closure. I see no good reason why gag season should be less than the 8 months it's supposed to be. Please adjust this years acl to account for the over estimated dead discards before early closure is announced due to an inaccurate acl. Thank you, David Plowden

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

November 14, 2014

Mr. Robert Mahood
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive; Suite 201
North Charleston, SC 29405

Re: Snapper Grouper (SG) Fishery Management Plan (FMP) Regulatory Amendment 22 (RA-22) Three Actions for Gag Grouper and Wreckfish Annual Catch Limits (ACLs), Optimum Yield (OY) and Recreational Bag Limits

Mr. Mahood,

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) about the three actions and alternatives based on the recent stock assessments for changes to the Gag grouper and Wreckfish ACLs, OY and recreational bag limits found in the SG FMP RA-22. The SFA ECFS will select preferred alternatives for the three RA-22 actions described below. With Action 3 Preferred Alternative 2, the SG Advisory Panel (AP) as a consensus recommended that the 5% recreational allocation be reduced to 1% and SFA ECFS supports that suggestion.

Action 1. Revise the annual catch limits (ACL) and optimum yield (OY) for gag

SFA ECFS Preferred Alternative 2. ACL = OY = ABC projected landings from 2015-2019 with P*=0.3. The ACL for 2019 would remain in place until modified.

Table S-1. ABC and ACLs for gag specified under **Alternative 2 (Preferred)** where ACL = OY = acceptable biological catch (ABC).

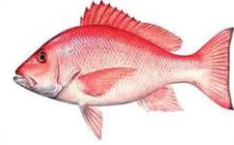
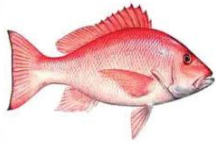
Year	ABC	Total ACL	Commercial ACL (51%)	Directed Commercial Quota*	Recreational ACL (49%)
2015	666,000	666,000	339,660	312,442	326,340
2016	671,000	671,000	342,210	314,992	328,790
2017	713,000	713,000	363,630	336,412	349,370
2018	748,000	748,000	381,480	354,262	366,520
2019	773,000	773,000	394,230	367,012	378,770

All values in pounds gutted weight (lbs gw) *Directed commercial quota = Commercial ACL – 27,218 lbs gw.

Action 2. Modify the recreational bag limit for gag within the aggregate bag limit

SFA ECFS Preferred Alternative 1 for No Action. Retain the current aggregate grouper bag limit of 3 fish. Within this limit, only one fish can be a gag or black grouper.

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

Action 3. Revise the annual catch limits (ACL) and optimum yield (OY) for wreckfish

SFA ECFS Preferred Alternative 2. ACL = OY = Proposed ABC. The ACL for 2020 would remain in place until modified.

Table S-8. ABC and ACLs for wreckfish specified under **Alternative 2 (Preferred)** where ACL = OY = ABC.

Year	New ABC lbs ww	ACL	Commercial ACL (95%)	Recreational ACL (5%)
2015	433,000	433,000	411,350	21,650
2016	423,700	423,700	402,515	21,185
2017	414,200	414,200	393,490	20,710
2018	406,300	406,300	385,985	20,315
2019	396,800	396,800	376,960	19,840
2020	389,100	389,100	369,645	19,455

However the SFA ECFS does not support the allocation of 5% of the new ABC to the recreational sector. This choice is made because after investigation it does not appear that any recreational landings for wreckfish have been physically intercepted during recent years. The SFA ECFS would prefer to see a 1% allocation for the recreational sector with developing this new fishery as the SG AP recently chose, and reapply the remaining 4% back to the commercial sector allocation before finalizing SG RA-22.

Later, if the recreational sector can prove that they have been able to land the 1% allocation the SAFMC can choose to revisit this proposed action in a future amendment, perhaps after the next wreckfish stock assessment update.

Thank you for this opportunity to comment.

Jimmy Hull, Chairman
SFA ECFS

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