OPTIONS PAPER

Gag and Wreckfish Fishing Level Recommendations (Snapper Grouper Regulatory Amendment 22)

June 2014

I. Approach – how do the changes get implemented?

A. **Abbreviated Framework** – Snapper Grouper Amendment 27 (SAFMC 2013; regulations effective 1/27/14) modified the framework to provide for accelerated actions that is **available if only adjusting ABCs, ACLs, and ACTs**:

"9. Adjustments to ABCs, ACLs, and ACTs according to the existing ABC Control Rule(s) and formulas for specifying ACLs and ACTs that have been approved by the Council and that were implemented in a fishery management plan amendment to the FMP. This abbreviated process is authorized as follows:

a. Following the Scientific and Statistical Committee's (SSC's) review of the stock assessment, the Council will determine if changes are needed to ABC, ACL, and/or ACT and will so advise the RA.

b. The Council will first hold a public hearing during the Council meeting during which they will review the stock assessment and the SSC's recommendations. In addition, the public will be advised prior to the meeting that the Council is considering potential changes to the ABC, ACL, and/or ACT and the Council will provide the public the opportunity to comment on the potential changes prior to and during the Council meeting.

c. If the Council then determines that modifications to the ABC, ACL, and/or ACT are necessary and appropriate, they will notify the RA of their recommendations in a letter with the Council's analysis of the relevant biological, economic, and social information necessary to support the Council's action.

d. The RA will review the Council's recommendations and supporting information. If the RA concurs that the Council's recommendations are consistent with the objectives of the FMP, the Magnuson-Stevens Fishery Conservation and Management Act, and all other applicable law, the RA is authorized to implement the Council's proposed action through publication of appropriate notification in the Federal Register, providing appropriate time for additional public comment as necessary.

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

e. If the Council chooses to deviate from the ABC control rule(s) and formulas for specifying ACLs and ACTs that the Council previously approved and that were implemented in a fishery management plan amendment to the FMP, this abbreviated process would not apply, and either the framework procedure would apply with the preparation of a regulatory amendment or a fishery management plan amendment would be prepared. Additionally, the Council may choose to prepare a regulatory amendment or a fishery management plan amendment even if they do not deviate from the previously approved ABC control rule(s) and formulas for specifying ACLs and ACTs."

- B. **Regular Framework** must be used if proposing more that adjustments to ABCs, ACLs, and ATCs (e.g., management measures like trip limits, bag limits, etc.)
- C. **Plan Amendment** must be used if changing allocations or items beyond framework

COMMITTEE ACTION: DETERMINE HOW TO IMPLEMENT CHANGES.

OPTION 1. MODIFY THE ABCs and ACLs FOR GAG AND WRECKFISH UNDER THE ABBREVIATED FRAMEWORK.

OPTION 2. MODIFY THE ABCs and ACLs FOR GAG AND WRECKFISH UNDER THE REGULAR FRAMEWORK.

OPTION 3. OTHERS??

II. Gag

A. Background

An update assessment to evaluate the stock of gag (*Mycteroperca microlepis*) off the southeastern United States was conducted in 2014. The primary objectives were to update and improve the 2006 SEDAR-10 benchmark assessment of gag and to conduct new stock projections. Using data through 2004, SEDAR-10 had indicated that the stock was not overfished but was undergoing overfishing. For the update assessment, data compilation and assessment methods were guided by SEDAR-10, as well as more recent SEDAR assessments. The assessment period for gag is 1962-2012.

Results suggest that spawning stock declined until the mid-1980s and has since been relatively stable, fluctuating around the Minimum Stock Size Threshold (MSST), with an upturn in the last several years. The terminal (2012) base-run estimate of spawning stock is near SSB_{MSY} (SSB₂₀₁₂=SSB_{MSY} =0.97), as is the median estimate (SSB₂₀₁₂=SSB_{MSY} =1.04), and this level is above the MSST (base: SSB₂₀₁₂=MSST =1.13; median: SSB₂₀₁₂=MSST =1.21). Projections suggested that spawning biomass would decline in the years immediately after 2012, primarily because of poor recruitment in 2010 and 2011. The estimated fishing rate has exceeded the MFMT (represented by F_{MSY}) for most of the last three decades, but has been decreasing in the last several years with the 2012 estimate below the MFMT. The current estimate of fishing rate, which is based on a three-year geometric mean, is above F_{MSY} in the case of the base run ($F_{2010-2012}=F_{MSY} = 1:23$) and the median ($F_{2010-2012}=F_{MSY} = 1:37$). Thus, the assessment found that the stock is experiencing overfishing, but is not overfished.

B. SSC Recommendations

At their April/May 2014 meeting, the SSC recommended the update assessment as the best scientific information available and considered it could be used for management of the gag resource in the South Atlantic. Revisions in the data and methods were reasonable and the assessment can be used for catch level recommendations.

The SSC recommended using 5-year projections at $P^*=50\%$ for OFL and at $P^*=30\%$ for ABC. There are now preliminary 2013 landings available and the Council would like to see projections using 2014 landings at the ACL. The SSC concurred and requested these projections be done.

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

Criteria			Det	terministic**	Probabilistic	
Overfished evaluation SSB/MSS	T(1-M)			1.13	1.21	
Overfished evaluation SSB/MSS	T(75%)			1.29	1.38	
Overfishing evaluation Fcurrent/	Fmsy			1.23	1.37	
MFMT				0.29	0.27	
SSBmsy (unit)			4	4,038,207 lb ww	1806.8 mt	
MSST (1-M)			(e)	3,472,942 lb ww	1546.3 mt	
MSST (75%)			3	3,028,711 lb ww	1355.1 mt	
MSY (1000 lb gw)				938,200 lb gw	900.4	
Y at 75% Fmsy (1000 lb gw)				921,100 lb gw	883.6	
ABC Control Rule Adjustment					20%	
P-Star					30%	
OFL RECOMMENDATIONS: I	P*=50%					
Year	Landed	Discard		Landed	Discard Number	
	LBS (gw)	LBS (gw)		Number		
2015	782,000	107,0	000	55,000	25,000	
2016	765,000	105,0	000	55,000	24,000	
2017	792,000	104,0	000	57,000	24,000	
2018	813,000	104,0	000	58,000	24,000	
2019	825,000	104,0	000	59,000	24,000	
ABC RECOMMENDATIONS:	P*=30%	r		1		
Year	Landed	Discard		Landed	Discard Number	
	LBS (gw)	LBS (gw)		Number		
2015	666,000	90,0	000	47,000	21,000	
2016	671,000	89,0	000	48,000	21,000	
2017	713,000	88,0	000	51,000	20,000	
2018	748,000	89,0	000	53,000	21,000	
2019	773,000	89,0	000	55,000	21,000	

Table 1. SSC recommendations for gag based on the SEDAR 10 Updated assessment.

** The SSC recommends using the deterministic values for stock status values.

C. COMMITTEE ACTION: REVIEW ALTERNATIVES, ADD/MODIFY, AND CHOOSE PREFERRED ALTERNATIVE.

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

Alternative 1 (No action). Do not revise annual catch limits (ACL) and optimum yield (OY) for gag. OY equals the yield produced by F_{OY} (Amendment 16). If a stock is overfished, F_{OY} equals the fishing mortality rate specified by the rebuilding plan designed to rebuild the stock to SSB_{MSY} within the approved schedule. After the stock is rebuilt, $F_{OY} = a$ fraction of F_{MSY} . The total ACL is 694,000 lb gw. Commercial and recreational allocations are 51% and 49%, respectively. The commercial ACL is 326,722 lbs gw (reduced from 353,940 lbs gw to account for gag discard mortality from commercial trips that target co-occurring species (i.e., red grouper and scamp) during a gag closure). The recreational ACL is 340,060 lbs gw. There are no ACTs for gag.

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

Discussion

Gag are not overfished and $F_{OY} = 75\% F_{MSY}$ and the yield at $75\% F_{OY} = 1,217,000$ lbs gutted weight. The gag ACL equals the yield at $75\% F_{MSY} = 694,000$ lbs gw. From Amendment 16: "Gag is not overfished but biomass is less than the biomass that produces MSY (B_{MSY}). The Council's Scientific and Statistical Committee (SSC) recommended a restriction in harvest to Foy, which is equal to the yield associated with 75% of F_{MSY}. This corresponds to a Total Allowable Catch (TAC) of 694,000 pounds gutted weight for all sectors (Table 4-9). Therefore, as biomass increases, the yield at Foy is expected to increase during 2009-2014. The Council recommended catch levels remain at 694,000 pounds gutted weight until modified by future action."

Alternative 2. ACL = ABC = projected landings from 2015-2019 with P*=0.3.

			Directed		Change from A	CLs in place	Recreational Cl	hange from avg	. landings
		Commercial	Commercial	Recreational	Commercial	Recreational	2 year avg	3 year avg	4 year avg
Year	ABC	ACL (51%)	Quota*	ACL (49%)	%Change	%Change	%Change	%Change	%Change
2015	666,000	339,660	312,442	326,340	-4%	-4%	171%	138%	124%
2016	671,000	342,210	314,992	328,790	-4%	-3%	173%	140%	126%
2017	713,000	363,630	336,412	349,370	3%	3%	190%	155%	140%
2018	748,000	381,480	354,262	366,520	8%	8%	205%	168%	152%
2019	773,000	394,230	367,012	378,770	12%	11%	215%	177%	160%
*Direc	ted con	nmercial qu	iota = Com	mercial A	CL – 27,21	8 lb gw.			

Discussion

Note: The commercial ACL will need to be reduced by 27,218 lb gw to account for discard mortality after gag closes and shallow water grouper is open. The assessment goes through 2012, prior to this change in 2013. When the next assessment is conducted, these discards will be included in the discard estimate from the assessment.

Alternative 3. ACL = ABC = 0.95*Proposed ABC **Alternative 4.** ACL = ABC = 0.90*Proposed ABC **Alternative 5.** ACL = ABC = 0.80*Proposed ABC

	New ABC	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Year	lbs gw		ACL=ABC	ACL=95%ABC	ACL=90%ABC	ACL=80%ABC
2015	666,000	694,000	666,000	632,700	599,400	532,800
2016	671,000	694,000	671,000	637,450	603,900	536,800
2017	713,000	694,000	713,000	677,350	641,700	570,400
2018	748,000	694,000	748,000	710,600	673,200	598,400
2019	773,000	694,000	773,000	734,350	695,700	618,400

OPTION 1. APPROVE THE RANGE OF ALTERNATIVES AND SELECT ALTERNATIVE 2 AS PREFERRED.

OPTION 2. APPROVE THE RANGE OF ALTERNATIVES AND SELECT ALTERNATIVE X AS PREFERRED.

OPTION 3. OTHERS???

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

D. Tables of Landings

The following tables are included as background and preliminary analyses of impacts.

	А	В	С	D	E	F
1	Commercial Gag	g Landings fr	om SERO wel	osite 4/15/1	.4	
2	Year	Fishing Season	Total Landings (gw)	ACL (gw)	Quota %	Closure Date
3	2013		327,306	326,722	100.18	11/13/2013
4	2012	Jan 1* - Dec 31	352,096	352,940	99.76	10/20/12; Re- opened 11/13/12 - 11/21/12
5	2011		412,675	352,940	116.93	
6	2010		411,632	352,940	116.63	
7	2009		442,760	352,940	125.45	

Table 2. Commercial gag landings from the NMFS SERO website showing %quota harvested and closure dates.

Table 3.	Recreational	gag landings from	m the NMFS	SERO	website s	showing	%ACL
harvested	1.						

	G	Н	I	J	К	L	М	N	0	Р	Q	R
1	Recreation	al Gag Land	ings from SI	ERO website	e 4/15/14							
2	Season	Jan-Feb	Mar-Apr	May-Jun	Jul-Aug	Sep-Oct	Nov-Dec	Total Reported	2013 ACL/Quota	Units	Dataset	ACL %
3	2013	0	0	34,653	24,467	4,356	119	63,595	340,060	gw	MRFSS	19%
4	2012	29	33	50,479	31,794	48,911	45,851	177,097	340,060	gw	MRFSS	52%
5	2011	430	55	59,386	26,173	41,398	42,412	169,854	340,060	gw	MRFSS	49.90%
6	2010	5,602	1,928	84,203	46,499	31,428	2,181	171,841	340,060	gw	MRFSS	50.50%
7	2009											

	A	В	С	D	Е	F
11	Total Landings f	rom SERO v	vebsite 4/15/	14		%TAC/ACL
12	Year	Comm	Rec	Total	TAC/ACL	Harvested
13	2013	327,306	63,595	390,901	694,000	56%
14	2012	352,096	177,097	529,193	694,000	76%
15	2011	412,675	169,854	582,529	694,000	84%
16	2010	411,632	171,841	583,473	694,000	84%
17	Average (4yrs)	375,927	145,597	521,524		
18	Average (3yrs)	364,026	136,849	500,874		
19	Average (2yrs)	339,701	120,346	460,047		

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

SE	DAKI	o projec	steu fallu	mgs.								
	A	В	С	D	E	F	G	Н	Ι	J	К	L
1											SEDAR 10	SEDAR 10
2	Gag comm	ercial and re	ecreational lar	ndings and AC	Ls in pound	s gutted wei	ight.				Projected	%Projected
3	Year	Comm	Comm ACL	% ACL	Rec	Rec ACL	% ACL	Total	Total ACL	% Total ACL	Landings	Landings
4	2005	555,539	-		505,419	-		1,060,958	-	-	1,462,000	73%
5	2006	511,435	-		588,928	-		1,100,363	-	-	1,436,000	77%
6	2007	601,712	-		505,660	-		1,107,371	-	-	1,299,000	85%
7	2008	470,161	-		691,300	-		1,161,461	-	-	694,000	167%
8	2009	432,274	352,940	122%	420,375	340,060	124%	852,650	694,000	123%	716,000	119%
9	2010	411,632	352,940	117%	171,841	340,060	51%	583,473	694,000	84%	768,000	76%
10	2011	412,675	352,940	117%	169,854	340,060	50%	582,529	694,000	84%	840,000	69%
11	2012	352,096	352,940	100%	177,097	340,060	52%	529,193	694,000	76%	916,000	58%
12	2013*	327,306	326,722	100%	63,595	340,060	19%	390,901	694,000	56%	976,000	40%

Table 5. Gag commercial and recreational landings and comparisons with the ACL and SEDAR 10 projected landings.

*Note: MRIP methodology changed in 2013.

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

III. Wreckfish Assessment

A. Background

The SSC discussed setting an ABC for wreckfish during their August 2010 meeting. The SSC stated that the 2001 assessment (Vaughan et al. 2001) indicated depletion at higher historical levels of effort and that the catch reductions appeared to have come mainly from gear restrictions, spawning season closure, and individual transferable quota (ITQ) implementation. Since stock size cannot be projected, an estimate of overfishing limit from the 2001 assessment could not be produced. A Depletion-Based Stock Reduction Analysis (DBSRA) or Depletion-Corrected Average Catch DCAC estimate could be calculated, but recent landings were confidential, therefore the SSC was not able to perform the calculations to produce these estimates. The SSC agreed the 2001 assessment was dated and did not apply to current landings and conditions. The SSC concluded that a control rule based on catch-only data should be used even though a stock assessment existed for wreckfish.

In the absence of a current assessment, the SSC reached consensus that it was inappropriate to use an old assessment applied to new catch data for catches coming from potentially different fishing conditions than at the time of the assessment. Therefore, in September 2010, the SSC recommended setting the Acceptable Biological Catch (ABC) at the average historical catch (1997-recent) of 250,000 lbs whole weight. Due to confidentially of data, a more precise level could not be set. The SSC also recommended conducting DCAC or DBSRA analysis in the next year to compare with the current catch-only recommendation.

In October 2011, the National Marine Fisheries Service ("NMFS"), Southeast Regional Office, submitted a document (updated in December 2011) titled "Depletion-Corrected Average Catch Estimates for U.S. South Atlantic Wreckfish" (Ref. Doc. SEROLAPP-2011-07) (hereunder referenced as "the DCAC Estimates") to the South Atlantic Fishery Management Council's Scientific and Statistical Committee (SSC).

The SSC reviewed the DCAC Estimates at its November 9, 2010 meeting; formed a subcommittee to review and refine the analysis; and, on November 10, 2010, recommended a new acceptable biological catch and annual catch limit for the Atlantic wreckfish fishery based on this report as peer reviewed. The ABC was thus set at the current level of 235,000 lbs whole weight.

In November 2012, the document titled "An Application of Statistical Catch-at-Age Assessment Methodology to Assess US South Atlantic Wreckfish" (hereunder referenced as "SCAA Application"), authored by Doug S. Butterworth and Rebecca A. Rademeyer, was discussed the SSC meeting in Charleston, S.C. The SCAA Application raises questions about some of the conclusions of the analyses in DCAC Estimates and proposes an alternative methodological approach to the wreckfish assessment. The SSC recommended that the SCAA Application be subjected to a "SEDAR-like review."

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

Following the November 2012 SSC meeting and the Council's subsequent adoption of the SSC's recommendation in December 2012, discussions with NMFS took place as to how to move the analysis forward and fulfill the Council's recommendation to finalize the assessment and subject the results to a "SEDAR-like review." Before those discussions culminated in any final determinations, the Council adopted its new third-party peer review process and determined that this assessment should be subject to that process.

The summary that follows is from "An Application of Statistical Catch-at-Age Assessment Methodology to Assess US South Atlantic Wreckfish", presented to the SSC in April/May 2014:

The available information on past catches, CPUE and catch-at-length distributions is sufficient to allow the application of Statistical Catch-at-Age methodology to assess the US South Atlantic wreckfish resource. The assessment is carried out for all combinations of four natural mortality (M) and three steepness values. A poor log-likelihood plus an inability to reflect a recent upward trend in CPUE rules out the lowest value of M =0.025 yr-1 considered. Although the fit to the length distribution data improves steadily as M is increased, estimated abundances become realistically large as M approaches 0.1. For the range of M (0.05 to 0.075) over which reasonable and realistic fits to the data are obtained, the resource is not overfished and overfishing is not occurring. The corresponding estimates of MSY range from 278 to 1293 thousand lbs, and suggest that a yet more optimistic conclusion about the resource can be reached than that drawn from a recent DCAC based analysis, with an appreciable increase in the ABC above its current level of 250 thousand lbs being defensible.

B. SSC Recommendations

At their April/May 2014 meeting, the SSC accepted the benchmark assessment as representing the best available scientific information on the current status of wreckfish in South Atlantic waters and considers it appropriate for SAFMC management decisions.

Criteria	Deterministic**	Probabilistic
Overfished evaluation	No	
	(SSB/75%SSBmsy=2.11)	
Overfishing evaluation	No	
	(F/Fmsy=0.583)	
MFMT	0.065	
SSBmsy (unit)	1,809 tons (3,988,000 lb ww)	
MSST (75%)	1,357 tons (2,992,000 lb ww)	
MSST (1-M)	1,743 tons (3,843,000 lb ww)	
MSY (1000 lb)	279,000 lb ww	
Y at 75% Fmsy (1000 lb)		
ABC Control Rule Adjustment		22.5%
P-Star		27.5%
OFL (1000 lb)	Projections at F=Fmsy	
ABC RECOMMENDATIONS: I	Projections at P*, 5 years	

Table 6. SSC recommendations for wreckfish based on the recent assessment.

** The SSC recommends using the deterministic values for stock status values.

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

Table 6 (continued). SSC recommendations for wreckfish based on the recent assessment.

ABC Projections (P*=27.5%)					
Year	Landings (1000 Lbs)				
2014	443,800 lb ww				
2015	433,000 lb ww				
2016	423,700 lb ww				
2017	414,200 lb ww				
2018	406,300 lb ww				
2019	396,800 lb ww				
2020	389,100 lb ww				

	OFL Projections						
Veen	Yield at Fmsy (1000 lbs)						
rear	Deterministic	Probabilistic (P*=50%)					
2014	439,700 lb ww	571,500 lb ww					
2015	429,400 lb ww	553,300 lb ww					
2016	419,700 lb ww	536,700 lb ww					
2017	410,600 lb ww	521,900 lb ww					
2018	402,000 lb ww	507,300 lb ww					
2019	394,000 lb ww	493,700 lb ww					
2020	386,600 lb ww	481,200 lb ww					

Deterministic Projections at F=75%Fmsy				
Year Yield at 75%Fmsy (1000				
2014	329,700 lb ww			
2015	326,700 lb ww			
2016	323,700 lb ww			
2017	320,800 lb ww			
2018	318,100 lb ww			
2019	315,500 lb ww			
2020	313,100 lb ww			

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

C. COMMITTEE ACTION: REVIEW ALTERNATIVES, ADD/MODIFY AND CHOOSE PREFERRED ALTERNATIVE.

Action 2. Revise annual catch limits (ACL) and optimum yield (OY) for wreckfish.

Alternative 1 (No action). Do not revise annual catch limits (ACL) and optimum yield (OY) for wreckfish. The wreckfish ABC=ACL=OY=235,000 ponds whole weight (lbs ww). Commercial and recreational allocations are 95% and 5%, respectively. The commercial ACL is 223,250 lbs ww. The recreational ACL is 11,750 lbs ww. There are no ACTs for wreckfish.

				Change from ACLs in place		
Year	New ABC	Commercial	Recreational	Commercial	Recreational	
	lbs ww	ACL (95%)	ACL (5%)	%Change	%Change	
2015	433,000	411,350	21,650	84%	84%	
2016	423,700	402,515	21,185	80%	80%	
2017	414,200	393,490	20,710	76%	76%	
2018	406,300	385,985	20,315	73%	73%	
2019	396,800	376,960	19,840	69%	69%	
2020	389,100	369,645	19,455	66%	66%	

Alternative 2. ACL = OY = ABC = projected landings from 2015-2020 with P*=0.275.

Alternative 3. ACL = OY = 0.95*Proposed ABC

Alternative 4. ACL = OY = 0.90*Proposed ABC

Alternative 5. ACL = OY = 0.80*Proposed ABC

Voor	New ABC					
rear	lb ww	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
2015	433,000	235,000	433,000	411,350	389,700	346,400
2016	423,700	235,000	423,700	402,515	381,330	338,960
2017	414,200	235,000	414,200	393,490	372,780	331,360
2018	406,300	235,000	406,300	385,985	365,670	325,040
2019	396,800	235,000	396,800	376,960	357,120	317,440
2020	389,100	235,000	389,100	369,645	350,190	311,280

Alternative 6. ACL = OY = OFL

Voor	New OFL			
rear	lb ww			
2014	571,500			
2015	553,300			
2016	536,700			
2017	521,900			
2018	507,300			
2019	493,700			
2020	481,200			

South Atlantic Snapper Grouper REGULATORY AMENDMENT 22

Discussion

Three letters were received requesting the wreckfish ACL be set at the overfishing limit (OFL) (**Attachment 1**). The letter from Jim Freeman and John Polston present the rationale for this alternative and is supported by letters from Directed Sustainable Fisheries, Inc. and Southeastern Fisheries Association, East Coast Fisheries Section.

The wreckfish recreational fishery is open in July/August and landings were 0 lbs ww in 2013 and 964 lb ww in 2012. The commercial fishing year runs April 16th through April 15th and landings thus far in 2014 are confidential. Past landings are shown in Table 6.

Species	Year	Fishing Season	Total Landings (ww)	ACL (ww)	Quota %	Closure Date
Wreckfish	2013-2014	April 16- Jan 14	195,084	201,148	97	
	2012-2013		192,523	201,148	96	
	2011-2012		287,093	1,802,000	16	
	2010-2011		231,820	1,802,000	13	
	2009-2010		194,999	1,802,000	11	

 Table 7. Commercial wreckfish landings from the NMFS SERO website.

Action 3. Specify the wreckfish recreational ACL is numbers of fish.

Alternative 1 (No Action). Do not specify the wreckfish recreational ACL in numbers of fish. The recreational ACL is 11,750 pounds whole weight (lbs ww). Alternative 2. Specify the new wreckfish recreational ACL in numbers of fish using an average weight of X pounds.

Alternative 3. Others??

Discussion

The Council is considering establishment of a recreational harvest tag program in Snapper Grouper Amendment 22 for species with very low recreational ACLs. The recreational ACLs for species under consideration, except for wreckfish, are specified in numbers of fish. If The Council intends to include wreckfish in the program, a recreational ACL specified in numbers of fish would be most appropriate for tag distribution.

IV. Proposed Draft Timing for Regulatory Amendment 22

If Abbreviated Framework Procedure (implemented in Am 27) is used:

- a) SSC reviews assessment April 2014
- b) Council receives assessment results and SSC recommendations June 2014. Provide guidance on actions/alternatives to be included.
- c) Draft ACL Adjustment Procedure document: review, modify & conduct public hearing at September 2014 meeting; approve for review and implementation – September 2014 Council meeting
- d) Document submitted to NMFS October 2014

If Regular Framework Procedure is used:

- a) SSC reviews assessment April 2014
- b) Council receives assessment results and SSC recommendations June 2014.
- c) Draft Framework Document: review, modify & approve for public hearings September 2014
- d) Public Hearings via webinar hearing prior to December 2014 meeting and a public hearing at the December 2014 meeting or take to public hearings in January/February 2015?
- e) Review public hearing comments, modify amendment as necessary, and approve for formal review and implementation December 2014 or March 2015
- f) SAFMC sends to NMFS for formal review by January 2015 or March 2015.

May 30, 2014

South Atlantic Fishery Management Council Voting Membership c/o 4055 Faber Place Drive, Suite 201 North Charleston, South Carolina 29405

Re: Future Wreckfish Acceptable Biological Catch Options

To the Voting Members of the South Atlantic Council,

The Wreckfish "third party" stock assessment, successfully performed by Dr. Doug Butterworth et al, and approved by your SAFMC Scientific and Statistical Committee (SSC), was funded by our team comprised of Jim Freeman (Sea Farmers of America, Inc.) and John Polston (King's Seafood, Inc.), with support from the commercial fishing communities. Since 1991, we have been historically important members of this fishery and are current Wreckfish individual fishery quota (IFQ) permit owners with the privilege of access to ~1/3 of the limited access IFQ using allocations established by the SAFMC. We provided a great deal of cooperation and data to this Wreckfish assessment process recently.

After the South Atlantic Fishery Management Council (SAFMC) Comprehensive Annual Catch Limit (ACL) Amendment was implemented during early 2011, the Wreckfish IFQ coupon owners experienced an 89% reduction of the available annual allocation of two-million pounds, in place during the past decade. The analyses that resulted in the negative economic impact used a recent Wreckfish annual landings history that averaged approximately a quarter of a million pounds, with only a few vessels working the annual quota.

Later, a data poor assessment approach, the depletion-corrected average catch (DCAC) model, was used to reinforce the 2011 Comprehensive ACL Amendment allocation results. This DCAC model underestimated sustainable fishing removals, in spite of the fact that both average landed fish size and catch per unit of effort (CPUE) had remained constant for two decades.

The recent SAFMC SSC meeting during April 2014 presented several options for setting the acceptable biological catch (ABC). As one option, SAFMC SSC Socio-economic panelist (SEP) representative Dr. Scott Crosson from the National Marine Fisheries Service/Southeast Fisheries Science Center (NMFS/SEFSC), suggested early on in the SSC Wreckfish discussion that a landings limit of approximately "500 thousand pounds" per year could be in our mind a reasonable ABC/ACL based upon historical fishing removals where average size and CPUE have been consistent across time.

From other options in the SSC final report, the deterministic projections using F=75%Fmsy are too conservative of an increase when compared to the current allocation, reduced from the previous two million pounds annually allocated. Alternatively, we suggest that the Council considers the option suggested by Dr. Crosson of ~500,000 pounds. We think that ABC should equal the overfishing limit (OFL), with values iterated as the probabilistic OFL projections in Table 2. (e.g. ABC_{2014} = 571 thousand lbs.) of the April 2014 SSC Final Report¹.

We believe that this ABC option is justified as the Wreckfish stock is **Not Overfished**, and **Overfishing is not occurring**. Further, the SSC recognized that the commercial fleet removal rate of ~ 250 thousand pounds in recent years was based "almost exclusively" upon economic, rather than biological factors. With our limited fleet governed by IFQ catch coupons, the one-way trip of 200-miles and the relative ease of catching about 7000 pounds a trip, this increase would be sustainable biologically and economical to reasonably support our future business, and 100% effective for the NMFS to monitor the catch landings limit with IFQ coupons.

By 2018, we propose that NMFS should produce an update to the current "third party" assessment for Wreckfish. To that end, our industry would gladly offer biological samples to contribute to the NMFS/SEFSC's future assessment of the stock.

Thank you for your consideration of our business future governed by reliable science.

Jim Freeman and John Polston

¹ <u>http://safmc.net/sites/default/files/meetings/pdf/Council/06-2014/Tab8-</u> SEDAR/A2 SSC SEPFinalReportApril2014.pdf

DIRECTED SUSTAINABLE FISHERIES, INC.

A FISHERIES CONSULTING COMPANY



May 30, 2014

South Atlantic Fishery Management Council Voting Membership 4055 Faber Place Drive, Suite 201 North Charleston, South Carolina 29405

Re: Future Wreckfish Acceptable Biological Catch Options

To the Voting Members of the Council,

The Directed Sustainable Fisheries, Inc. (DSF) offers this letter of support for Jim Freeman (Sea Farmers of America) and John Polston (King's Seafood) whose support of a third-party stock assessment for Wreckfish has resulted in an opportunity to increase the acceptable biological catch (ABC). They have suggested an option to set the ABC equal to the overfishing limit (OFL) using the 2014 projection of approximately 571,000 pounds. DSF encourages the Council to give this option strong consideration.

For me personally I have worked with Mr. Freeman and Mr. Polston throughout this scientific process for the assessment of Wreckfish. The third-party assessment process established over these last two years can prove useful for the SAFMC fishing communities in the future and we thank the Council members for helping to make it happen.

If you need any further information, please contact me anytime.

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SOUTHEASTERN FISHERIES ASSOCIATION (SFA)







EAST COAST FISHERIES SECTION (ECFS)

May 30, 2014

South Atlantic Fishery Management Council (SAFMC) Voting Membership c/o 4055 Faber Place Drive, Suite 201 North Charleston, South Carolina 29405

Re: Future Wreckfish Acceptable Biological Catch (ABC) Options

Voting Members of the Council,

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) offers this letter of support for two of the SFA ECFS Board of Directors, Jim Freeman (Sea Farmers of America) and John Polston (King's Seafood, Inc.) whose support of a third-party stock assessment for Wreckfish has resulted in options for an ABC increase. In their letter to the SAFMC, they have suggested an option to set the ABC equal (=) to the overfishing limit (OFL), using the 2014 OFL projection of ~571,000 pounds. We feel that the Council should strongly consider this option.

Please call me if you need any further information from the SFA ECFS Board and membership. Thank you for making decisions to support the fishing communities and the seafood consumers of the SAFMC region.

Jimmy Hull, Chairman SFA ECFS