Hello,

“If it Ain’t broke...Don’t fix it”. Often said tongue in cheek, but it makes a lot of sense. There are far too many science and data issues plaguing our fisheries and fishermen already. The over-regulation of healthy stocks has taken its toll, perhaps by design, so why add more burden. It seems the removal of the provision of Dolphin being caught recreationally but sold commercial it likely driving this allocation issue. This is one of the last fish we recreational anglers have good access to, so why kill that? There is no indication that the stock is anywhere near overfished. A sector under-fishing a stock is a good thing, not a reason to reassign the quota. Common sense!

As to AM’s, this has to be a 2 way street. It has too long been all take and never give. Even with the overestimation of recreation effort that remains with the new MRIP, as a carryover in methodology from the MRFSS, we still have healthy and growing stocks. Punishing recreational anglers when its believed they ‘Overfish’ their quota, but not rewarding when we under fish, well see the point? AM’s should “Pay Back” to the sector when the quota is under fished. Of coarse on fish like Snowy Grouper with a whole region only allowing a little over 500 fish to share for the season, yet commercially some 50,000 pounds gutted, well, not only not fair, not ever likely to see recreational anglers get their fair share in this growing fishery.

Both items in this scoping issue require something not available. Those items are, Reliable Recreational Effort Numbers, and Reliable Stock Assessments. Its understood that the NMFS determines the data allowed to be used and the options available, but the council does have the power to consider whether data is unreliable. Data that common sense suggest along with a personal experience to be out of touch with reality should be treated as such, even when provided by NMFS.

Captain Henry
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Being a commercial fisherman that has experienced a ongoing assualt by this council on a industry that has been a big part of my life for close to 40 years, it is hard not to look to this amendment without considerable skepticism.

A case in point is first off the issue of the mahi allocation should have never been a topic of discussion since it was utterly ridiculous for a council to further minimize the industry that formerly ONLY had 13% of the quota on this species.....only later to find itself relegated to 7% on a species that is not overfished nor is overfishing taking place. Also, it should be pointed out to this council that this species is as prized on the dinner table to the consumers of this nation as it is to the recreational sector that routinely throws half of it's take away due to freezer burn. A 10 fish recreational bag limit is as ridiculous as the 7 % commercial quota. Finally, since this species expands far beyond the boundaries of this councils domain, the question arises as to whether this council should even have the lead on this species. HMS seems a more likely home.....

Next, as to the discussion of AM,s, my skepticism is even greater on this topic. The bottom line is AM,s are strictly a one way street as the most recent SEDAR 36 on snowie grouper exposed. In the fishery last year alone the recreational community exceeded their AM by well over four times on a fishery that is managed on a three year running average.....and yet reopened this year. What a charade.

And now a council seeks input on allowing either sector to possibly stay open if the other doesn't reach it's AM. The bottom line is those of us in the industry never have to worry about reaching our quota since we always get busted back when 75% of our quota is reached. Either scenerio on AM's be they overfished or not overfished leaves the door open to further the charade. So i am in total opposition to linking sector species AM,s for this reason unless the species is not overfished nor is overfishing taking place as with Mahi. jeff oden

My name is Jeff Oden and I thank you for the opportunity to comment on this document

As for the request for comment on allocation %'s of the dolphin fishery, it is ridiculous that it ever came to be a topic of discussion since the allocation had been and should still be 13 % commercial/87% recreational. There was never any reason to change it in the first place on a species that is not overfished, and with the recreational community already holding the lions share of the allocation for which they have never used. For this council to have taken and additional 6% of this valuable fishery from the industry is a prime example of how little regard this council gives to the well being of the commercial fishing communities that dot our coast , not to mention consumer access. On top of that this council should not have the lead on this species in the first place because of it's highly migratory nature. So of course the answer to this question is leave the 13 % as the commercial allocation.

Secondly, it really is even more incredible that this council even bothers trying to discuss ACL's when it routinely makes a mockery of this process....as with recreational snowy grouper. Having been a fly on the wall at the most recent SEDAR 36 assessment of this species, I found it incredible that the Regional Administrator this year reopened a fishery that went over it's 2012 ACL by well over four times (my neighbor caught that many) on a overfished species and yet it reopened this year.

And of course those of us commercially who are 8 years in a rebuilding schedule on this species are still stuck with a 100 lb. trip limit which won't even allow those of us that used to primarily target this species to throw the lines off the dock. If you couple that with a council that has and continues to undermine the industry with the 2/1 permit provision under the premise of capacity reduction since 1998 and during that same time has allowed charter/headboats unlimited access (tripled from 611 to 1806 permits during the same timeframe) (even allowing captains and mates the ability to sell their catch) and it's not hard to get a persecution complex if you make a living on the water.

So as for the answer to the ACL questions, why have them if they are only going to affect the commercial industry.....and we commercially know they WILL affect us.....whether it is a required closure or having to pay the penalty in rebuilding schedules for recreational overages allowed by the REGIONAL ADFMINISTRATOR.

With that said, in no way should the commercial and recreational ACL's be linked since that only allows for more creative bookkeeping from a council that can only manage one set of books accurately.....or us commercially. I can easily envision this council shutting down the industry when 75% of the quota is reached, only to allow the recreational sector to continue fishing since both ACL,s had not been met even though theirs had.

Finally, for this council to allow recreational ACL's to be given a three year reprieve before review, and then to allow a resetting of the clock regardless of the overages incurred is the most absurd abuse of the accountable constituents ...or those of us commercially. The only question is.....when will the charade stop?

jeff oden
Hatteras N.C.

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)

EAST COAST FISHERIES SECTION (ECFS)

Mr. Bob Mahood, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405
Date: Thursday February 13, 2014

AMDolphinAllocAmendC@safmc.net

Re: Generic Accountability Measures and Dolphin Allocation, Amendment 34 to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region, Amendment 9 to the Fishery Management Plan for the Golden Crab of the South Atlantic Region, and Amendment 8 to the Fishery Management Plan for the Dolphin Wahoo Fishery of the Atlantic

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 Generic Accountability Measures and Dolphin Allocation, Amendment 34 to the Fishery Management Plan (FMP) for the Snapper Grouper (SG) Fishery of the South Atlantic Region, Amendment 9 to the FMP for the Golden Crab (GC) of the South Atlantic Region, and Amendment 8 to the FMP for the Dolphin Wahoo (DW) Fishery of the South Atlantic Region addressed in the January 2014 scoping document. The SAFMC is considering the following actions in these Amendments:

- Define the [commercial and recreational] stock status criteria required for implementing accountability measures for snapper grouper species [Black grouper, Mutton snapper, Yellowtail snapper, unassessed snapper grouper species, Black sea bass, Greater amberjack and Red porgy, Gag, Golden tilefish, Red grouper, Red snapper, Snowy grouper, Vermilion snapper and Wreckfish] and golden crab [commercial with no recreational component]
- Allocation of dolphin between recreational and commercial sectors

The SFA ECFS Board and membership understands that at this stage of potential rulemaking the SAFMC has no solid preferences and is seeking public input with regard to the two possible Actions, and the various alternatives and/or sub-alternatives to the three amendments.

For Action 1, the SFA ECFS does not endorse either Alternative 2, or Alternative 3 to modify AMs for all the SAFMC species involved in the three amendments, and tentatively we support No Action, Status Quo, Alternative 1 for Action 1 until a later comment period occurs to better study the Action 1.

The DW Advisory Panel (AP) strongly supported the achievement of the commercial allocation equaling to "one and one-half million pounds" during the past few DW AP meetings.

Alternative 4 for Action 2 calls for a 90% recreational, and 10% commercial allocation. This is almost a 25% increase with regards to the commercial allocation per year, and based on the recent historical landings trends for Dolphin in the SAFMC region where those landings never reached "one and one-half million pounds", with most landings about a million pounds annually.

For proposed Action 2, the SFA ECFS tentatively endorses Alternative 4, yielding a 90% recreational and 10% commercial Dolphin allocation.

Jimmy Hull, Chairman
SFA ECFS
jgh/rhh

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Accountability Measure: recreational AM. should be barb less hooks on all recreational or charter party in south Atlantic when the ACL is exceeded.

Accountability Measure: A total length of fish to be retained.
Example: 120 inches total length. would allow 2 - 60 inch fish or

6 20 inch fish but no discarding allowed due to size. South Atlantic should replace all recreational size limits, with total length to be retained limits; for species to prevent discarding & discard mortality. {utilization of all fish encountered.}

AM could require enhancement programs where fish were selected for fast growth, and water temperature was maintained to produce fast growing
females. { science will say dolphin reproduction is not a problem
Science is then ignoring the reproduction reduction due to man made chemicals & pharmaceuticals}

AM should NOT reduce fishing or economic return from the species, Accountability Measures should trigger enhancement programs targeting
production of faster growing female fish. Enhancement toward faster
growing fish.

Science should be asked to EXPLAIN HOW DISCARDING DEAD FISH HELP RECOVER THE STOCK.
EXPLAIN HOW GENETICALLY ALTERING FISH TOWARD SMALLER SLOWER GROWING FISH THROUGH REGULATIONS IS A BENEFIT TO THE SPECIES OR THE FISHERMEN.

United National fishermen association 123 Apple Rd Manns Harbor NC 27953