January 18, 2014

Chairman Ben Hartig
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Chairman Hartig,

Thank you for the opportunity to provide input on a number of proposed fishery management plan amendments that are up for either scoping or public hearings this month

Below are our comments for council consideration.

Snapper Grouper Regulatory Amendment 16 (Scoping):

Black sea bass pot fishery closure November 1 through April 30 -

We believe the actions the fishery council took in Snapper-Grouper Amendment 18A in 2012, such as capping the number of vessels utilizing pot gear at 32, limiting vessel to 35 pots, requiring that pots be brought back to shore after each trip and establishing a commercial trip limit of 1,000 lb., reduced the potential for any interactions with right whales, even though there never have been any documented interactions between whales and pot gear.

The CFSF supports allowing a black sea bass pot fishery November 1 through April 30, even if it is restricted to areas outside the defined right whale critical habitat, such as considered in new Alternative 6 of the proposed Amendment.

Snapper Grouper Amendment 29 (Public Hearing):

Only Reliable Catch Stocks (ORCS) Approach -

We support amending the fishery council's ABC Control Rule proposed in Action 1, Alternative 2, to adopt the SSC's recommended approach to determine ABC values for Only Reliable Catch Stocks.

Action 2: We support the application of the revised ABC Control Rule to the selected unassessed snapper-grouper species in the low, moderate and high risk categories using the Risk Tolerance scalars in Sub-alternatives 2b, 3b and 4b.

Fishermen would benefit for the higher ACLs that would result from the amended ABC control rule and the application of the higher Risk Tolerance scalars.

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Gray Triggerfish –

Action 3: We support Alternative 4, which would specify a minimum size limit for gray triggerfish of 14 inches fork length in federal waters off North Carolina, South Carolina, Georgia, and east Florida.

From the standpoint of yield from a 12 inch or smaller triggerfish, it is not large enough to benefit commercial markets and is small even for personal consumption. We think the fishery would benefit from a minimum size limit of 14 inches.

Action 4: We support Alternative 2, which would change the allocation of the commercial ACL to 50 percent from January 1 through June 30 and the other 50 percent from July 1 through December 31 each year. The gray triggerfish seasons would then mirror the seasons for vermilion snapper and since these are co-occurring species that are caught together, this Alternative would reduce bycatch of both species.

Action 5: We support the use of trip limits to manage commercial fisheries, however this action needs more alternatives for analysis.

Consideration should be given to establishing a trip limit for gray triggerfish that is combined with a step-down trip limit when 75 percent of the commercial ACL is met or is projected to be met. A range of step-down trip limits such as 50 lb., 75 lb., 100 lb., and 150 lb. should be considered.

Coastal Migratory Pelagics Amendment 24 (Scoping):

Modifying sector allocations for Atlantic migratory group Spanish mackerel and Gulf migratory group king mackerel -

The CFSF supports optimization of fishery ACLs. It's clear that in both fisheries, the total ACLs have never been landed in the 10 year time series within Tables S-1 and S-2 in the scoping document, and that the commercial sector has exceeded its ACL while the recreational sector has landed decreasingly lower proportions of its ACL.

The fishery council should consider reallocation alternatives in both fisheries.

Coastal Migratory Pelagics (Mackerel) Framework Amendment 1 (Public Hearing):

Modify the Annual Catch Limit (ACL) for Atlantic and Gulf Spanish mackerel migratory groups -

The CFSF supports the alternatives that would increase the ACLs for these fishery groups.

Consideration of our comments is appreciated.

Respectfully,

Wayne Mershon
President

Mr. Bob Mahood, Executive Director
South Atlantic Fishery Management Council
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MackfmwkAm1Comments@safmc.net

Date: Tuesday January 28, 2014

Re: Coastal Migratory Pelagics Fishery Management Plan Framework Amendment 1

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 Coastal Migratory Pelagics (CMP) Fishery Management Plan (FMP) Framework Amendment 1 to revise Spanish mackerel annual catch limits (ACL). This is a joint Council effort between the Gulf of Mexico Fishery Management Council (GMFMC) and the SAFMC, which the SFA ECFS will address in this written comment.

Action 1. Modify the Annual Catch Limit (ACL) for Atlantic migratory group Spanish mackerel

SFA ECFS supports the South Atlantic Preferred Alternative 2. Revise the ACL (including sector ACLs), OY, and ACT for Atlantic migratory group Spanish mackerel for 2014 and 2015. The ABC recommended by the SSC is 6.063 mp ww. Set ACL = OY = ABC, and the recreational ACT = ACL[(1-PSE) or 0.5], whichever is greater. The ABC, ACL, and recreational ACT values are based on landed catch only; discards are accounted for in specifying the ABC in terms of landed catch and not total kill. The average PSE from MRIP for 2005-2009 is 13.34. The values would remain until modified.

ACL = OY = ABC = 6.063 mp ww
Commercial ACL (55%) = 3,334,650 lbs ww
Recreational ACL (45%) = 2,728,350 lbs ww
Recreational ACT = 2,363,218 lbs ww

Action 2. Modify the Annual Catch Limit (ACL) for Gulf migratory group Spanish mackerel

*****NOTE: The alternatives below are staff recommendations and have not been reviewed or approved by the Gulf Council.**

SFA ECFS recognizes that the GMFMC will meet next month to set Preferred Alternatives and reserves any further comment on Action 2 until a future public hearing.

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Alternative 1 (No Action). Retain the current ACL for Gulf migratory group Spanish mackerel:
Current ABC = 5.15 mp ww.
ACL= ABC =5.15 mp ww (single Gulf-wide stock ACL).

Alternative 2. Revise ACL for Gulf migratory group Spanish mackerel for 2014 through 2016 as shown below, and set ACL = ABC.

Table S-1. ABCs and ACLs for 2014-2016 from the SEDAR 28 Gulf Spanish mackerel stock assessment and the Gulf Council/SSC-approved projections for Gulf migratory group Spanish mackerel. 'ww' = whole weight, and 'mp' = million pounds.

Year	ABC ww	Total ACL ww
2014	12.7 mp	12.7 mp
2015	11.8 mp	11.8 mp
2016	11.3 mp	11.3 mp

Jimmy Hull, Chairman
SFA ECFS
jgh/rhh

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