

Summary of Public Hearing Comments on Amendment 32:

3 written comments were received.

Consider a 50-pound trip limit on blueline tilefish while commercial harvest for snowy grouper is open as they are caught together.

Blueline Tilefish should be managed with split seasons that align with co-occurring species and appropriate possession limits to avoid extended closures and excessive regulatory discards.

Support for Council's preferred alternatives under Actions 2-6.

Support for Alternative 2 under Action 7: 100 pound gw trip limit.

Support for commercial trip limit of 100-200 pounds.

Support for Alternative 6 under Action 8 because it allows for the MRIP Wave 3 May/June to be measured year to year. Alternative 6: Establish a vessel limit of blueline tilefish of 1/vessel/day year during May and June with no retention during the remainder of the year.

Concern over problems with SEDAR 32. The assessment does not reflect the true status of the blueline tilefish stock.

Blueline Tilefish landings from the early 1980s were most likely misreported Golden Tilefish landings since that was a targeted and significant fishery at the time whereas blueline tilefish was considered a bycatch species.

Both bottom longline and the hook & line (bandit) landings data are biased in the SEDAR 32 database.

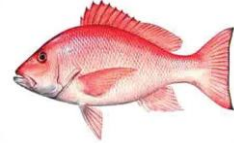
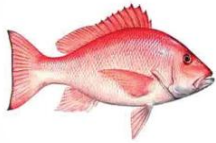
Serious concerns over reliability of MRIP estimates for this species, especially during 2006-2008 when the fishery expanded in North Carolina.

Blueline tilefish and Snowy grouper should have been assessed together as these deepwater species coexist throughout most of their geographic and depth range.

August SAFMC Public Hearing Comments

I am Chris McCaffity. My comments concerning Blueline Tilefish, Snowy Grouper, and Gray Triggerfish are that these quotas should be managed with split seasons that align with co-occurring species and appropriate possession limits to avoid extended closures and excessive regulatory discards. The council's primary focus should be on properly managing all of our quotas to avoid closures that result in well over a million pounds of seafood being allocated to projected dead discards every year.

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

August 18, 2014

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

**Email comments to: Mike.Collins@safmc.net
(Subject line: Amendment 32 comments)**

Re: Snapper Grouper Amendment 32 Blueline Tilefish

Mr. Mahood,

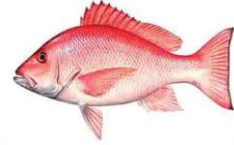
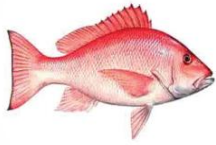
The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) regarding the proposed Snapper Grouper (SG) Amendment 32 for the Blueline Tilefish stock. We share the concerns of several Council members about problems with SEDAR 32; and, likewise, believe that the status of this fish stock was not accurately assessed with the result being, overfished.

Again, we agree with the Council's recognition that the SEDAR 32 Blueline tilefish stock assessment was flawed, as the result of significant data issues. As a result, we look forward to the recently scheduled Standard Assessment with a 2014 terminal year¹.

However, the flawed SEDAR 32 assessment has resulted in severe Emergency rule action, resulting in current closures and massive reductions in the acceptable biological catch (ABC). These management actions have resulted in economic loss for those previously active in this fishery from North Carolina south to Florida. The problems with SEDAR 32 and the resulting management actions are unacceptable; especially since we have pointed out the obvious problems with the historical landings data. Specifically, we know that putative Blueline Tilefish landings from the early 1980's were misreported Golden Tilefish landings from that significant targeted fishery, and not Blueline tilefish, a bycatch species at that time. Both bottom longline and the hook & line (bandit) fishing gears landings data is biased in the SEDAR 32 database. These problems were shown in our written comment to the SAFMC SSC during the April 2014 meeting. We are including the Blueline tilefish comment on projections with this written comment.

¹ <http://safmc.net/sites/default/files/meetings/pdf/Council/06-2014/Comm%20Reports/FINAL/SEDARCommFINALReportJun14.pdf> Final June 2014 SEDAR Committee Report

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

In hindsight, the Blueline tilefish and Snowy grouper should have been assessed together at a SEDAR stock assessment, collectively, as these deep water species co-exist throughout most of the range and depths. They should be reassessed next year at the same venue as the SAFMC moves forward in its plan to reassess Blueline Tilefish. Fishermen throughout the South Atlantic know that the data utilized for both species needs further scrutiny in the stock assessment process..

With regard to the proposed SAFMC SG Amendment 32 actions, in general, we are not content with the quality of the science being utilized to assess this and other data poor species. The SAFMC's SSC should have requested the SEFSC to immediately produce alternative models to deal with obvious data issues following the SEDAR 32 assessment process. See our quote, below, on Blueline tilefish from the SAFMC SSC meeting.

"The independent reviewers at the SEDAR 32 RW questioned the validity of MRIP recreational landings data used to construct a record of recreational fishing landings. The RW was addressed by fishing industry representatives that cast serious doubt over the veracity of the MRIP Blueline Tilefish landings history (see DW figure 4.11.1 below). The unreliability of MRIP estimates is particularly concerning during the recent expansion of the fishery north of Cape Hatteras from 2006 to 2008, including some elevated discard data from 2007. Further, we believe that SEDAR 32 did not effectively address anomalous annual commercial landings records during the 1980's where Blueline Tilefish were likely confused with Golden Tilefish in reporting, before institution of the Trip Ticket reporting system (from DW Fig. 3.4)."²

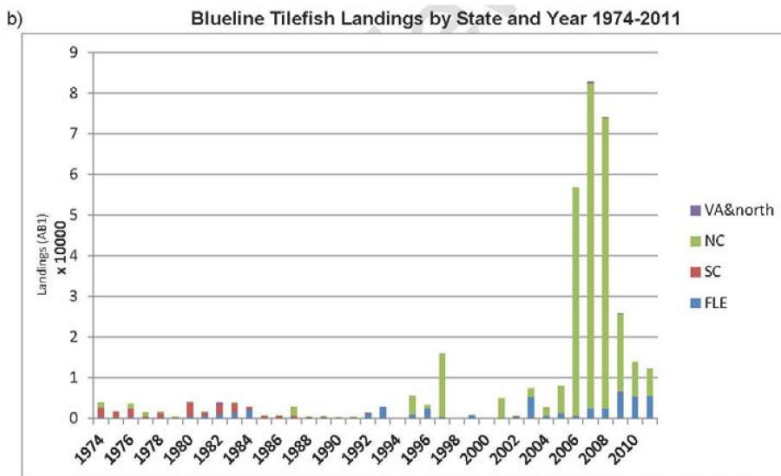
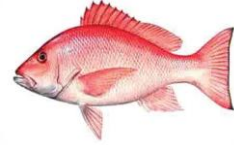
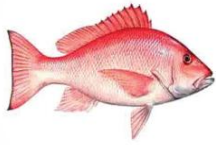


Figure 4.11.1. Estimated number of Atlantic blueline tilefish landings from MRFSS/MRIP (1981-2011) and SRHS (1974-2011) by state (a), by state and year (b), and by state and mode (c). Florida landings from east coast only, including Florida Keys. Due to confidentiality concerns SRHS landings for GA and FLE are grouped and shown as FLE.

² SFA ECFS comment to the SAFMC SSC during the April 2014 meeting
<http://safmc.net/meetings/briefing-book-ssc-meeting-april-29-may-1-2014>

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

April 2013

South Atlantic Blueline Tilefish

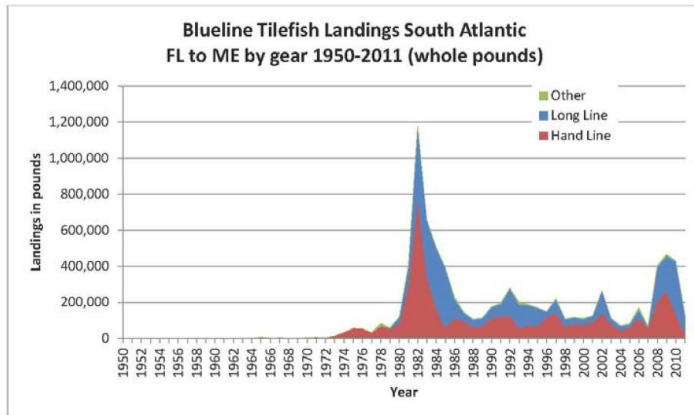


Figure 3.4 Blueline tilefish landings, in whole weight pounds, for all states (FL-ME) by gear.

Pasted below are the SAFMC actions that contain various alternatives from the SG Amendment 32 public hearing document, some of which the SFA ECFS agrees with the preferred, unless otherwise indicated.

1) Composition of the Deepwater Complex

SFA ECFS supports the changes created by Action 1, Alternative 2 Preferred

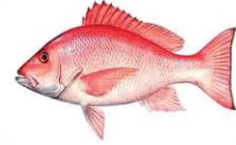
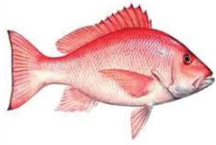
"Alternative 2 (Preferred). Remove blueline tilefish from the Deepwater Complex. Revise the Deepwater Complex annual catch limits, optimum yield, and recreational annual catch targets to reflect the removal of blueline tilefish. **Retain ACL=OY=ABC for the Deepwater Complex.** Retain recreational ACT equals $ACL \cdot (1 - PSE)$ or $ACL \cdot 0.5$, whichever is greater for the Deepwater Complex."

"The following alternatives are being recommended for the Council to review at their September 2014 meeting."

2) Maximum sustainable yield (MSY)

SFA ECFS supports the changes created by Action 2, Alternative 2 Preferred

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

| | Equation | F _{MSY} | MSY Values (pounds whole weight) |
|-------------------------------------|--|----------------------------|-------------------------------------|
| Alternative 1. No Action | Do not change the current definition of MSY for blueline tilefish. Currently, MSY equals the yield produced by F _{MSY} . F _{30%SPR} is used as the F _{MSY} proxy. | F _{30%SPR} =0.356 | not specified |
| Alternative 2. Preferred | MSY equals the yield produced by F _{MSY} or the F _{MSY} proxy. MSY and F _{MSY} are recommended by the most recent SEDAR/SSC. | 0.302 | 226,500 |

3) ACLs and optimum yield (OY)

SFA ECFS supports the changes created by Action 3, Alternative 3 Preferred

" **Alternative 3 (Preferred)**. Establish annual catch limits for blueline tilefish. **The blueline tilefish ACL = OY = 98%ABC**. Specify commercial and recreational ACLs for blueline tilefish for 2015, 2016, 2017, and 2018 and beyond. The annual catch limit for 2018 will remain in effect until modified. Annual catch limits in 2016, 2017, and 2018 will not increase automatically in a subsequent year if present year projected catch has exceeded the total annual catch limit. Specify commercial and recreational annual catch limits based on existing sector allocations (50.07% commercial and 49.93% recreational)."

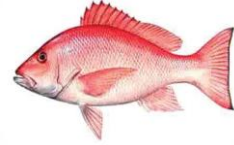
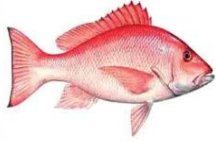
| Year | Blueline Tilefish ACL (pounds ww) | | |
|--------------------------------|--------------------------------------|------------|--------------|
| | Total | Commercial | Recreational |
| 2015 | 35,632 | 17,841 | 17,791 |
| 2016 | 53,457 | 26,766 | 26,691 |
| 2017 | 71,469 | 35,785 | 35,685 |
| 2018 and beyond until modified | 87,974 | 44,048 | 43,925 |

4) Recreational annual catch target (ACT)

SFA ECFS supports the changes created by Action 4, Alternative 2 Preferred

"**Alternative 2 (Preferred)**. Establish an annual catch target for blueline tilefish for the recreational sector that equals the recreational ACL*(1-PSE) or ACL*0.5, whichever is greater."

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

| Year | Blueline Tilefish ACT (pounds ww) | | |
|--------------------------------------|---|--|--|
| | Action 3; Alternative 2 (ACL=ABC) | Action 3; Preferred Alternative 3 (ACL=98%ABC) | Action 3; Alternative 4 (ACL=90%ABC) |
| 2015 | 11,368 | 11,141 | 10,231 |
| 2016 | 17,055 | 16,714 | 15,350 |
| 2017 | 22,802 | 22,346 | 20,522 |
| 2018 and beyond until modified | 28,067 | 27,506 | 25,261 |

Note: Calculations use the most recent 5 years of recreational landings to obtain the PSE.

| Blueline Tilefish PSE | |
|--------------------------|-------|
| Year | |
| 2009 | 35.6 |
| 2010 | 27.8 |
| 2011 | 43.6 |
| 2012 | 27.8 |
| 2013 | 52.1 |
| Average | 37.38 |

5) Commercial accountability measures (AM)

SFA ECFS supports the changes created by Action 5, Alternative 2 SubAlt 2c Preferred

SFA ECFS supports the changes created by Action 5, Alternative 4 SubAlt 4b Preferred

"Alternative 2 (Preferred). Specify the following in-season and post-season accountability measures for blueline tilefish and the Deepwater Complex for the commercial sector: If commercial landings as estimated by the Science and Research Director reach or are projected to reach the commercial ACL, the Regional Administrator shall publish a notice to close the commercial sector for the remainder of the fishing year.

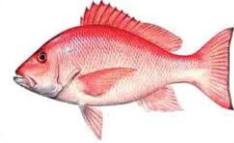
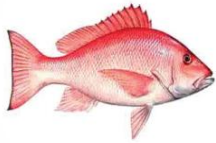
On and after the effective date of such a notification, all sale or purchase is prohibited and harvest or possession of this species in or from the South Atlantic EEZ is limited to the bag and possession limit. This bag and possession limit applies in the South Atlantic on board a vessel for which a valid Federal commercial or charter vessel/headboat permit

for South Atlantic snapper grouper has been issued as appropriate, without regard to where such species were harvested, i.e., in state or Federal waters. Additionally,

Sub-alternative 2c (Preferred). If the commercial ACL is exceeded, the Regional Administrator shall publish a notice to reduce the commercial ACL in the following fishing year by the amount of the commercial overage, only if the species is overfished and the total ACL (commercial ACL and recreational ACL) is exceeded.

Note: For the Deepwater Complex, at least one of the species would need to be overfished."

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

6) Recreational AMs

SFA ECFS supports the changes created by Action 6, Alternative 2 SubAlt 2c Preferred

SFA ECFS supports the changes created by Action 6, Alternative 4 SubAlt 4b Preferred

"Alternative 2 (Preferred). Specify the following post-season accountability measures for blueline tilefish and the Deepwater Complex for the recreational sector: If recreational

landings, as estimated by the Science and Research Director, exceed the recreational ACL, then during the following fishing year, recreational landings will be monitored for a persistence in increased landings.

Sub-alternative 2c (Preferred). If necessary, the Regional Administrator shall publish a notice to reduce the length of fishing season and the recreational ACL in the following fishing year by the amount of the recreational overage, only if the species is overfished **and** the total ACL (commercial ACL and recreational ACL) is exceeded. The length of the recreational season and recreational ACL will not be reduced if the Regional Administrator determines, using the best scientific information available, that a reduction is unnecessary."

"Alternative 4 (Preferred). If recreational landings reach or are projected to reach the recreational annual catch limit, National Marine Fisheries Service will file a notification with the Office of the Federal Register to close the recreational sector for the remainder of the fishing year, unless, using the best scientific information available, the Regional Administrator determines that a closure is unnecessary."

"Sub-alternative 4b (Preferred). Regardless of stock status."

7) Commercial management measures

SFA ECFS supports the changes created by Action 7, Alternative 2 Preferred

"Alternative 2. Establish a commercial trip limit for blueline tilefish of 100 pounds gutted weight (gw)."

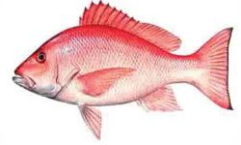
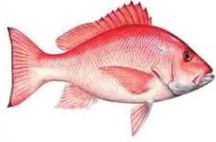
8) Recreational management measures

SFA ECFS supports the changes created by Action 8, Alternative 6 Preferred because it allows for the MRIP Wave 3 May/June to be measured year to year

"Alternative 6. Establish a vessel limit of blueline tilefish of 1/vessel/day year during May and June with no retention during the remainder of the year."

Jimmy Hull, Chairman

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

SFA ECFS

Good afternoon,

As owner of Blue Ocean Market in Morehead City, I would like to voice my concern on snowy grouper, trigger and blueline tilefish. We vote to keep the trip limit on snowy grouper between 100-200lbs a trip, trigger 500-1000lbs, and blueline tile 100-200lbs. As a wholesale and retail fish market we rely on snowy grouper during the winter months when the shallow water species are closed. Allowing for higher trip limits would insure that the quota is caught much faster, thus diminishing our supply of local grouper to our customers. We feel the same way about triggers and blueline tilefish. We vote for trip limits on these species that will allow for harvesting throughout the year and not just for a few months. It is nearly impossible to run a seafood business currently with these species only open for a few months out of the year. Our retail customers do not understand why we used to have trigger and tile fish year round and this year we have none all summer and fall. Our restaurant customers are switching to imported frozen fish now that our seasons are so short. In conclusion, we need these fish throughout the year, not just during a few months when a few fishermen want to catch the entire quota.

Sincerely,

David Tucker M.B.A.

Chris Edwards

Eric Forsberg

Comments on Blueline Tilefish SEDAR 32 projections

The conservative benchmarks from SEDAR 32 South Atlantic Blueline Tilefish have inappropriately resulted in a stock status of **overfished** and **undergoing overfishing**. We are well aware that the conservative benchmarks that resulted from SEDAR 32, such as the MSST value (where MSST is set too close to B_{msy}), were set at unrealistic levels where the stock status will oscillate between overfished and not overfished in any given assessment. This has put the SSC and the SAFMC in a precarious position of developing rebuilding plans that may be quickly met, and then just as quickly re-assessed as overfished. These regulatory constraints, which have again resulted from overly-conservative model benchmarks, hurt both the recreational and commercial fishing industry, as well as the coastal economies of the SE US. Meanwhile, the SAFMC and staff have been put in a frenetic mode to produce rebuilding plans for fisheries that are sustainable by more realistic metrics.

SEDAR 32 must be updated with a realistic MSST value

Using contemporaneous methods of evaluating MSST, the stock status of South Atlantic Blueline Tilefish should be: **not overfished**. Accordingly, after Snapper-Grouper Amendment 21 is approved, stock status should be adjusted to the new MSST level of 75% SSB_{MSY} , and projections made accordingly. We support expeditious approval of SG Amendment 21 that would set MSST at 75% SSB_{MSY} for Blueline Tilefish, as well as other long-lived snapper-grouper species. Following approval of SG Amendment 21, the SEFSC and the SSC should re-evaluate the findings of SEDAR 32, and produce realistic fishery stock projections.

The NMFS-SEFSC continues to have problems creating spatially explicit models

We have the same concerns with SEDAR 32 as with SEDAR 36 snowy grouper, that the NMFS-SEFSC BAM model did not rigorously and adequately assess developing fisheries north of Cape Hatteras. In SEDAR 32, the analysts did not evaluate CPUE above 35 degrees N latitude, where a significant portion of the fishery has developed over the past decade. The SEDAR 32 CIE reviewers (see Melvin review in SEDAR 32 SAR) recognized this, and established that the CPUE north of 35 degrees N latitude was much higher than the southern zones. As SEDAR 32 only considers CPUE between 28 & 35 degrees N, the significant landings to the north are not being indexed accurately in the assessment. This again suggests that the NMFS-SEFSC's BAM model is not accounting for a now widely recognized climate change factor that is resulting in range extensions of South Atlantic species, and recent development of fisheries north of Cape Hatteras. This is important as a significant fishery has developed north of Cape Hatteras, whereas historically, the Blueline Tilefish was largely a bycatch species during directed trips for snowy grouper in the South Atlantic region.

Problems with recreational landings data

The independent reviewers at the SEDAR 32 RW questioned the validity of MRIP recreational landings data used to construct a record of recreational fishing landings. The RW was addressed by fishing industry representatives that cast serious doubt over the veracity of the MRIP Blueline Tilefish landings history (see DW figure

4.11.1 below). The unreliability of MRIP estimates is particularly concerning during the recent expansion of the fishery north of Cape Hatteras from 2006 to 2008, including some elevated discard data from 2007. Further, we believe that SEDAR 32 did not effectively address anomalous annual commercial landings records during the 1980's where Blue-line Tilefish were likely confused with Golden Tilefish in reporting, before institution of the Trip Ticket reporting system (from DW Fig. 3.4).

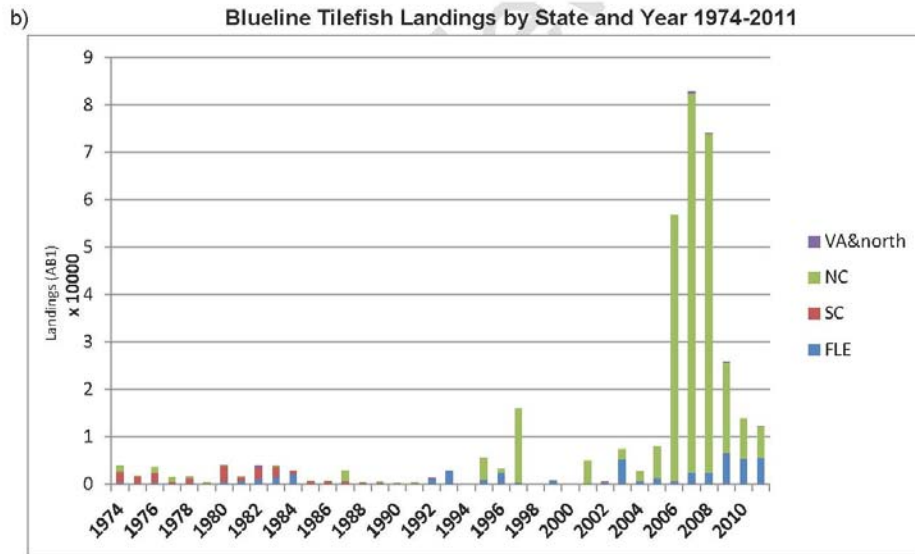


Figure 4.11.1. Estimated number of Atlantic blue-line tilefish landings from MRFSS/MRIP (1981-2011) and SRHS (1974-2011) by state (a), by state and year (b), and by state and mode (c). Florida landings from east coast only, including Florida Keys. Due to confidentiality concerns SRHS landings for GA and FLE are grouped and shown as FLE.

April 2013

South Atlantic Blue-line Tilefish

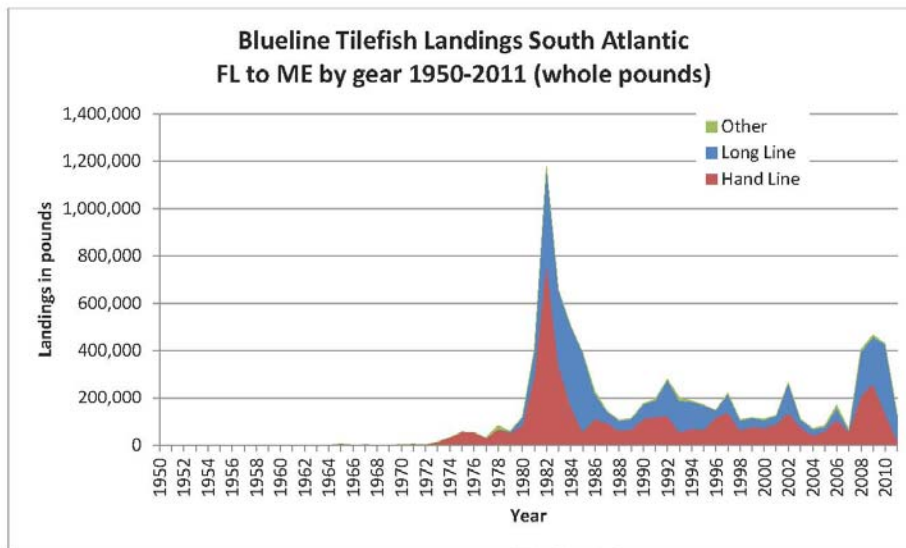


Figure 3.4 Blue-line tilefish landings, in whole weight pounds, for all states (FL-ME) by gear.