To: SAFMC Council December 9, 2015

Comments on Amendment 16

I am opposed to reopening the BSB pot fishery in Amendment 16 from November 1 thru April 30th for the following reasons:

1. All options will add some risk to the migrating whales so the pots should stay out of the water during this time.
2. BSB spawn in March and April so pots should not be used during the spawning season.
3. The projected 5% increase in revenue in this ACL fishery could be more easily achieved by increasing the mesh size in the pots to 2 ½”.
4. The BSB pot holders can still operate in the fishery during this time period with hook and line gear.
5. The pots are an “unclean fishery” – too much bycatch of other species of fish (trigger fish, hogfish, tomtates, ring tails, etc.)
6. The pots also clean areas out so that the remaining BSB fish are below the recreational size limit which leads to increased recreational discards.
7. The pots also remove a lot of baitfish for grouper or other larger fish
8. The pots leave only the smallest females for spawning – they are a very effective straining device

I would much rather see an amendment to increase the commercial minimum size limit to 13” to align with the recreational size limit and increase the BSB pot mesh size to 2.5”. This was proposed when the recreational size limit was increased in Amendment 18A in 2012. The commercial size limit was not changed then because of the BSB pots would have a lot of discards. Some CRP’’s were to look at this and come up with a new recommendation for mesh size.

Just three years ago this fishery was overfished and experiencing overfishing, this is a success story in that the fishery is in a much better state because of the pot closures, season closures and increased minimum sizes. Let’s not go back to where we were. If we increase the pot mesh sizes the average price per pound could increase by 25 to 35%. Also more spawning will take place before they are harvested which will in turn increase biomass and ACL’s over time.

Let’s use this opportunity to manage this fishery in a more sustainable manner and in doing so increase profits for the fishermen for the long haul versus the small short term increase being proposed in this Amendment 16.

Thank you,

Jim Atack