

Dear Ms Medina,

We are writing to thank you for chairing the Catch Shares Taskforce, and express our support for a comprehensive South Atlantic snapper grouper catch share. We are fishermen from Little River, SC and Murrells Inlet, SC and hold snapper grouper permit. Between Little River and Murrells Inlet, there over twenty vessels that fish for snapper grouper, and we understand that SC lands around 25% of all the snapper grouper landed in the South Atlantic.

Over the last six months, we have been working with other fishermen and dealers in North Carolina, South Carolina, Georgia, and Florida on a sign-on letter asking the South Atlantic Fishery Management Council (Council) to reconsider a comprehensive snapper grouper catch share program. We have over 80 signatures at this point, and plan to continue to grow that list in advance of a presentation we're giving to the Council at the September meeting. We have attached this letter for your information.

We, and other fishermen are worried that with current (amendment 16) and future regulations (red snapper and others) that our boats are going to be tied to the docks for months out of the year. With black sea bass closing a month early this year, and tilefish closing in late May 2008 and early April 2009, we are already seeing shorter and shorter seasons. With a closure on gag and other shallow water species from January – May (our money makers) and the real chance that we might meet the lower TAC early, we could be looking at not a four month closures but a six to eight month closure. Under those circumstances, we have a hard time visualizing a way that we and other commercial fishermen (or the fish house) can make it.

We don't know what all the details of a snapper grouper catch share would look like, but we do know the current system is not working for us. We've talked with fishermen in the Gulf, and catch shares seem to be working for them.

The Council has looked at a catch share before. In February 2007 the Council convened a workgroup made up of snapper grouper fishermen from all states and gear types, dealers, along with some other non-fishermen to look at a catch share program for snapper grouper. This group presented their report to the Council in March of last year. Of the 11 voting members (12 total – one did not vote), 55% “saw a strong potential for adopting a catch share for the snapper grouper fishery provided it is enforced, there is money to pay for it, and that there are tangible economic and conservation benefits resulting from it” (page 4 LAP Workgroup Report), 27% were undecided, and 18% did not think their was potential for a snapper grouper catch shares program. You can read this report by going to www.safmc.net and clicking on the Limited Access Privilege Program tab. We think 55% support and 27% undecided is pretty darn good given that fishermen didn't know what their allocation would be or what the program would really look like when voting. We think that vote alone should have been enough for the Council to analyze a catch share as part of an amendment. When the Council puts other regulations into place they don't require even close to 55% support from fishermen or advisory panels, so why is that the case for catch shares?

Last year the Council seemed to think 55% support was not enough to initiate a catch share amendment for all 73 species; rather they needed to see support from the broader fishing community. However, they did not reject catch shares. They moved forward with a tilefish catch share (on the grounds that there is a developing derby) option included in amendment 18 (Matt served on the fishermen workgroup that helped come up with the options) and the Council chair, Duane Harris among other Council members since then have expressed support for a comprehensive snapper grouper catch share.

But, a lot has changed for fishermen since March 2008. Amendment 16, with lower TACs on vermillion and gag and the four month closure on gag and other shallow water grouper, threaten to put us out of business (and that does not even factor in the upcoming closures on red snapper). The fishery is in

trouble, and there are a growing number of fishery participants that want to see if catch shares can make things better.

We urge you to do everything you can to support the commercial industry in the South Atlantic including having either you or Dr. Lubchenco attend the September 14-18 Council meeting, send a letter of support for a snapper grouper catch share program to the Council (all 73 species), provide the necessary funding and staffing to both the SAFMC and the NMFS Southeast Regional Office to develop and implement a comprehensive snapper grouper catch shares program, and include the snapper grouper fishery (all species) as one of your target fisheries.

Thank you for your consideration of our comments.

Sincerely,

Matt Ruby
Fisherman/3 Permits
(retail/wholesale/dealer)
Little River Fish House Manager
Served on Tilefish LAP Workgroup
Fishery Participant Since 1997

William (Phil) Conklin
Owner of Seven Seas Seafood
Fisherman/Permit Holder
Member of SAFMC SG AP since 1994
Served on the SAFMC Snapper Grouper LAP
Exploratory Workgroup

Cc: Mark Holliday
Cc: Duane Harris
Cc: Rita Merritt
Cc: Roy Crabtree
Cc: South Carolina Council members (Robert Boyles, David Cupka, Tom Swatzel)
Cc: Bob Mahood