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

E-mail: SGAmend20APHcomment@safmc.net

Re: SG Amendment 20A

Monday November 21, 2011

To Bob Mahood,

On behalf of some SFA East Coast Fisheries Section (SFA ECFS) stakeholder participants of the South Atlantic Fishery Management Council (SAFMC) Wreckfish "individual transferable quota (ITQ)" fishery management plan (FMP), we are submitting a comment with regard to Snapper Grouper Amendment 20A.

Thank you for your attention to our stakeholders future in this Wreckfish ITQ fishery, especially after the great economic investment undertaken since the beginning of this SAFMC limited access management system.

Jimmy Hull, Chairman rhh
SFA ECFS

Proposed Actions in Amendment 20A

ACTION 1. Define and revert inactive wreckfish shares.

Alternative 3 (Preferred): Define inactive shares as shares belonging to any ITQ shareholder who has not reported wreckfish landings in 2006-07 through 2010-11, and revert for redistribution.

SFA ECFS supports Action 1, Preferred Alternative 3.

ACTION 2. Redistribute reverted shares to remaining shareholders.

Alternative 2: Redistribute reverted shares to remaining shareholders based on 50% equal allocation + 50% landings history.

Option b: landings history in fishing years 2006-07 through 2010-11.

SFA ECFS supports Action 2, Alternative 2, Option b.

111 W. GRANADA BLVD
ORMOND BEACH, FLORIDA 32174-6303
SFAECFS@AOL.COM

ACTION 3. Establish a share cap.

Alternative 4 (Preferred): Establish share cap as 49% of the total shares.

SFA ECFS supports Action 3, Preferred Alternative 4.

ACTION 4. Establish an appeals process.

Alternative 2 (Preferred): A percentage of the wreckfish shares for fishing year 2012/2013 will be set-aside to resolve appeals for a period of 90-days starting on the effective date of the final rule. The Regional Administrator (RA) will review, evaluate, and render final decisions on appeals. Hardship arguments will not be considered. The RA will determine the outcome of appeals based on NMFS' logbooks. If NMFS' logbooks are not available, the RA may use state landings records. Appellants must submit NMFS' logbooks or state landings records to support their appeal. After the appeals process has been terminated, any amount remaining from the set-aside will be distributed back to remaining ITQ shareholders according to the redistribution method selected under Action 2.

Sub-alternative 2b (Preferred): Five percent of Wreckfish shares will be set aside for appeals.

SFA ECFS supports Action 4, Preferred Alternative 2, Preferred Subalternative 2b.

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