

The South Atlantic Fishery Management Council would like to submit comments on Amendment 7 to the 2006 Consolidated Atlantic Migratory Species Fishery Management Plan. Specifically the Council is in support of a hybrid alternative rather than Alternative E to Modify the General Category Subquota Allocations.

The Council supports the current preferred alternative of E c1 which allows NMFS to proactively transfer quota from one or more of the sub-quotas through in-season action and Federal Register Notice. This would allow quota from the General Category December Sub-quota (5.2%) from a given year to be proactively transferred into the General Category January sub-quota (5.3%) allowing greater access to Blue Fin Tuna when they are accessible to the fisherman in the northern portion of the South Atlantic Region (Transfer would allow for a total of 10.5% to be harvested under this January sub-quota). The concern is that the January sub-quota has an end date of March 31. The BFT have been available in April and May but not accessible due to the March 31 closure date.

The second alternative in this section considered establishing 12 equal monthly sub-quotas. This would have allowed access to the available fish in April and May but was not preferred. Concerns were concentrated on allocation issues and did not indicate a biological concern with quota harvest during April and May.

Section 1502.14(a) of the National Environmental Policy Act (NEPA) states that “agencies shall: rigorously explore and objectively evaluate all reasonable alternatives....”

The Council concluded that an additional alternative should have combined Alternative E 1C but allowed the January fishery to continue until the sub-quota is reached or May 31, whichever comes first.

These proposed modifications to the current system would align the fishery with the current conditions while not impacting the stock biologically or any other region’s access to the additional sub-quotas. This action would not create a new fishery. It would simply allow for the January sub-quota to be fully harvested and for fishermen to harvest their portion of the allocation while the fish are accessible and increase the social and economic benefits of the BFT fishery through sustainable and profitable harvest.

It is important to note that public comments received in reference to the General Category sub-quotas (Section W comment 98) indicated a need for the fishery to access the January sub-quota “January to June”. Along with additional comments received and personal communications, this hybrid option should have been specifically stated within this amendment and it would appear this was an oversight and we request this be corrected.

The Council concluded that this hybrid option is within the NEPA required range of analyzed options within this amendment and concluded this hybrid option should be made the preferred within Amendment 7 allowing this change to be implemented before the 2015 season. (The alternative that considered the 12 equal monthly sub-quotas analyzed 8.3% per month. The hybrid alternative would have a maximum of 10.5% being harvested over a 4 month season).

Above comments (Amen 7) should be sent directly to

Brad.mchale@noaa.gov

Margo.schulze-haugen@noaa.gov

The South Atlantic Fishery Management Council would like to submit comments on Amendment 9 to the 2006 Consolidated Atlantic Migratory Species Fishery Management Plan.

The Council supports alternative A2-1A. This alternative allows for smooth dogfish to make up any portion of the retained catch although it does not allow any other species of shark to be retained. The Council cautions NMFS to thoroughly consider the needs of the fisherman. Smooth dogfish are often caught in conjunction with the SCS fishery which does not alter the need for fisherman to be able to process smooth dogfish at sea. Our interpretation of the exemption allowed by the Shark Conservation Act of 2010 is a total allowance for the removal of smooth dogfish fins while at sea with no further restrictions. It should be noted that ASMFC has already implemented the 12% fin/carcass ratio from the SCA through Addendum II to the Interstate Fishery Plan for Coastal Sharks.

The Council opposes proceeding with management measures and quota setting before the stock assessment is complete (SEDAR 39). We believe waiting until for the assessment to be completed would allow for the best available science to be utilized. Without needed review from an SSC there will be no additional delay required once the latest data is available.

Comments above (Amen 9) should be sent to



Request for Comments

Please submit comments to:

<http://www.regulations.gov>
Keyword - "0648-BB02"

Comment
Period Closes
November 14th

Direct Link: <http://www.regulations.gov#!docketDetail;D=NOAA-NMFS-2014-0100>

Or Mail:
NMFS SF1, 1315 East-West Highway, Silver Spring, MD 20910
Please identify comments with 0648-BB02
For more information go to: <http://www.nmfs.noaa.gov/sfa/hms/>

1