September 2014 SAFMC Meeting Public Comments

As the water cools and fall fishing heats up commercial snapper/grouper fishermen will be forced to discard almost every species of fish we catch. The entire South Atlantic fleet will be targeting a few kinds of legal seafood which will cause those quotas to be filled faster. All these closures contribute considerably to the MILLION+ pounds of projected dead discards being deducted from our quotas every year. Most of this wanton waste is avoidable by simply managing each quota to avoid a total closure with low by-catch allowances. Most allowances should be triggered once a percentage of a quota has been landed. Split seasons would help avoid long periods of low limits. Openings could be planned so reduced limits coincide with spawning seasons. Some species with low quotas should only be managed as by-catch fisheries. We should target fish with higher limits while keeping most of our by-catch. This would greatly reduce regulatory discards while providing consumers with a consistent supply and wider variety of local seafood.

We should work to limit discards while encouraging fishermen to release illegal fish so they have the best chance of survival. The Pacific Fishery Management Council is rewarding responsible fishermen with higher quotas as fewer fish are allocated to dead discards based on voluntary use of descending devices. The use of by-catch allowances, circle hooks, and descending devices should significantly increase our quotas which will further reduce regulatory discards.

Please think about how quotas can be managed to have as many positive benefits and few negative impacts as possible for fish, fishermen, and consumers. Keep in mind that appropriate by-catch allowances would negate the need for other possession limits. Shouldn't managing existing quotas to avoid extended closures and excessive discards be one of the council's primary goals?