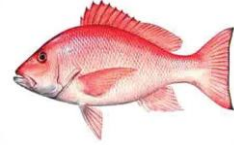


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

November 28, 2014

South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Council members:

The Southeastern Fisheries Association- East Coast Fisheries Section (SFA ECFS) provides the following comments as you establish ACLs for Atlantic King mackerel.

1. Uncertainty of Atlantic King Mackerel recruitment

The SEDAR 38 Review Panel determined that the Stock-Recruitment relationship of NMFS-SEFSC's Atl. King mackerel model was "incoherent" and therefore recommended a F30% SPR proxy instead of a MSY benchmark. This was a result of recognition that annual recruitment is not based directly upon SSB, but that recruitment is "stochastic" (or variable) over time due to environmental factors, even when the SSB is robust- as is the case with this Atl. King mackerel stock. The Council's SSC recognized that the NMFS' indicator of recruitment, the SEAMAP trawl survey, does not include the area south of Cape Canaveral, FL- where the largest King mackerel stock spawning event occurs each April to August- off of Palm Beach Co., FL. Also, **the NMFS-SEFSC failed to verify their model output with their own NMFS trip interview program (TIP) data, which indicate recruitment of new age classes into the fishery.** In the graph, below, we provide the King mackerel TIP data from 2010 to 2014 for FL/GA, which indicates a strong and "new" recruitment of 2-3 yr. old age-class fish, during 2014, into the fishery.

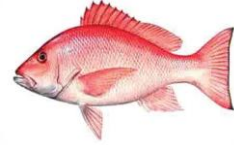
2. Projection alternatives based upon recruitment

Based upon the inability of the SEDAR 38 stock assessment to estimate a coherent annual stock-recruitment relationship, and NMFS' recognition that environment factors, such as "Gulf stream eddies," are largely more correlative with successful King mackerel recruitment events, the Council should not penalize future stock projections. The SSB for the Atl. King mackerel stock is healthy, fishing exploitation levels have been low, and stochastic (variable) recruitment is inherent in high biomass coastal migratory pelagic stocks. **The Council should choose the "medium" ABC option for setting ACL projections, to account for variable recruitment rates over time.**

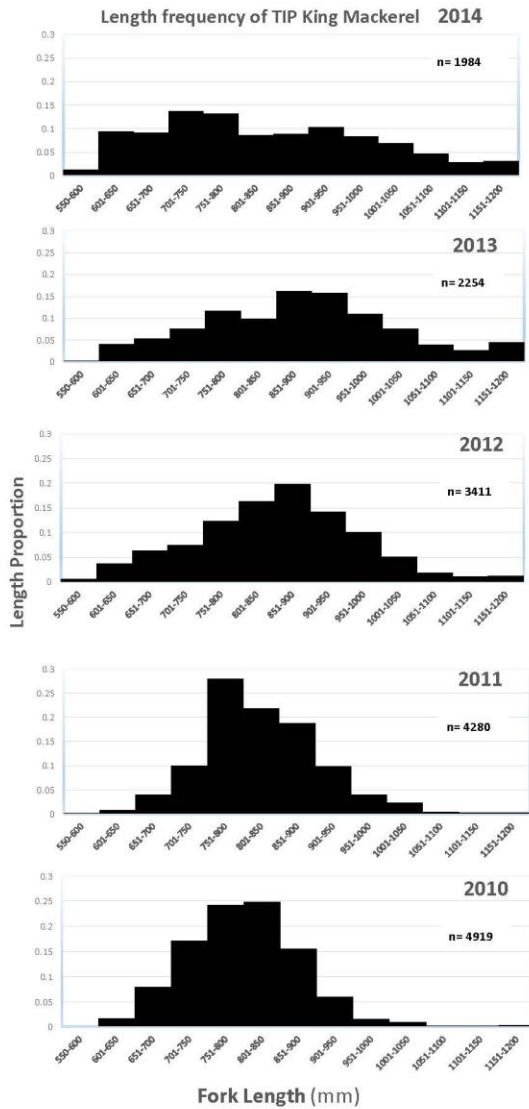
3. Productivity-susceptibility analysis (PSA) as High Risk of "over-exploitation" King Mackerel stock?

Based-upon a study by an external fisheries consulting company, Marine Resource Assessment Group (MRAG), the Council and its SSC are backed into classifying stocks in the South Atlantic region as "High Risk" for overexploitation. As a result, an increased buffer of ABC (P* penalty of 10%) will inappropriately reduce ACLs. While a "High Risk" characterization may be appropriate for snapper-grouper species with low biomass, the Atl. King mackerel stock with a F30% SPR biomass of ~12 million lbs./ yr., that is largely caught by a trolling fishery, should not be characterized as "High Risk." **The Council should immediately, at the December 2014 meeting, amend the ABC control rule to more appropriately characterize high biomass Coastal Migratory Pelagic species in the South Atlantic, such as King mackerel, with a lower susceptibility to "over-exploitation."**

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Thank you for your consideration of our comments.

Sincerely,
Jimmy Hull, Chairman, SFA ECFS