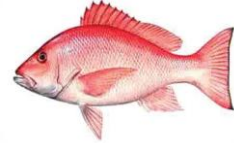
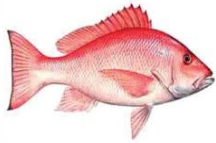


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

November 30, 2014

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

Re: Vision Blueprint Goals, Objectives and Strategies for December 01, 2014 meeting in NC

Council Members,

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) provides the following comment on the Council's *'Draft Vision Blueprint Goals, Objectives and Strategies for the Management and Communication'* actions. The goal is to *"adopt management strategies that rebuild and maintain fishery resources, adapt to regional differences in the fishery, and consider the social and economic needs of fishing communities."*

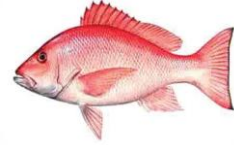
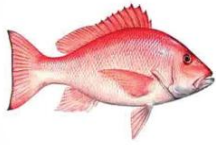
Our membership is concerned that many aspects of the Vision agenda including proposals for catch shares, vessel monitoring systems (VMS) and marine protected areas (MPAs) are not consistent with the suggestions and guidance provided by our stakeholders at the earlier Vision port meetings. Specifically the SFA ECFS does not support any further development of catch share programs for the snapper-grouper fisheries in the South Atlantic Council region.

The SFA ECFS is not supportive of the use of electronic monitoring (EM) for any professional fleets, including the commercial and for-hire fleets. We believe this initiative is inequitably targeting professionals, but not including the largest fishing sector, the private recreational fleet. We are also concerned about the paucity of electronic reporting (ER) on the part of the same private recreational fleet, while professional fleets are increasing the transparency of catch records through ER.

We do not support the establishment of "new" MPAs in the South Atlantic Council region, but do support proposals for "reorientation" of existing MPAs to more appropriately include critical fisheries habitat. The commercial Vision port meeting participants suggested that rolling spawning season closures on a state by state basis, or some sub-region could be a solution. This alternative may be more effective in protecting spawning aggregations than creating new spawning special management zones (SMZs). Current MPAs have not been properly assessed by NMFS for their efficacy, as either spawning protection zones, or for quantitative protection of fisheries stocks.

Furthermore it is unrealistic to think that the current marine law enforcement patrol efforts can adequately enforce any additional MPAs, SMZs or Marine Sanctuaries. Rolling spawning

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

closures for "species of concern" would be easier to enforce from a dockside or inlet intercept by law enforcement personnel.

Thank you for your consideration of these comments and we hope the current vision blueprint does not cause additional burdens for our stakeholders.

Jimmy Hull, Chairman
SFA ECFS