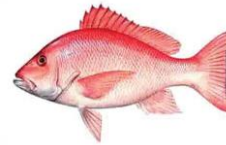
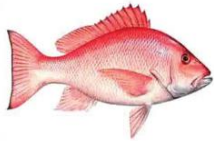


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

October 21, 2014

South Atlantic Fishery Management Council
Scientific & Statistical Committee
4055 Faber Place Drive, Suite 200
North Charleston, South Carolina 29405

Re: SSC Meeting Public Comment October 28-30, 2014

Scientific & Statistical Committee (SSC) Members:

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) provides the following written comment on agenda items that are important to the SFA ECFS Board and membership. SFA ECFS comments are underlined following quotes from the SAFMC SSC Overview for this meeting.

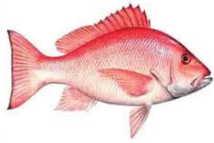
SEDAR ACTIVITIES

"SEDAR 41, South Atlantic red snapper and gray triggerfish, will be delayed approximately one year while the SEFSC addresses concerns that [headboat] data from the early years are unreliable due to misreporting by participants."

The historic Headboat (HB) logbook Index has been problematic dating back to SEDAR 25 Black Sea Bass in 2011, following the original divulgence by HB captains (see Hull SEDAR 25 RW-01 working paper) that the "volunteer" Headboat logbook data (ca. 1972-late 1980's) were wrought with "recall bias" and problems with reporting of landings. Indeed, the SEDAR 25 AW & RW recognized this and performed the following technical "fixes" to allow use of the HB Index and landings: 1) SEDAR 25 "truncated" the beginning of the HB Index at 1979, instead of starting in 1972; 2) the AW, recognizing the "uncertainty" in the historic data, artificially inflated the "error" (CV's) around the annual means to 0.3 for years before 1984, and a lower CV of 0.15 after 1984 to reflect more certainty in the HB Index data in the recent history. From the SEDAR 25 SAR (Sec. 5 of RW Report, pg. 6):

"Standardization of the Headboat landing series provided unrealistically low CV's, likely due to the coarse level of reporting qualities, and these CV's were inflated for use in the age-based assessment model."

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SFA-ECFS believes that the SEDAR 41 AW can address the problems with the Headboat Index, as was done in SEDAR 25. The indefinite delay of SEDAR 41, by the NMFS-SEFSC, is without technical merit, and we encourage the SAFMC SSC to propose resumption of the stock assessment schedule.

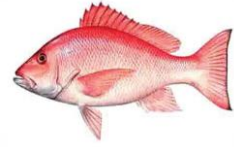
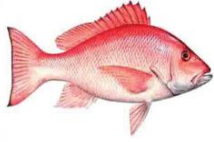
"The red grouper, golden tilefish, blueline tilefish update process assessments for 2015 are also delayed, due to staff turnover and the headboat data issues."

SFA ECFS proposes that delays of non-Headboat dependent SAFMC stock assessments, for species such as Golden Tilefish, are unnecessary and should be resumed in 2015.

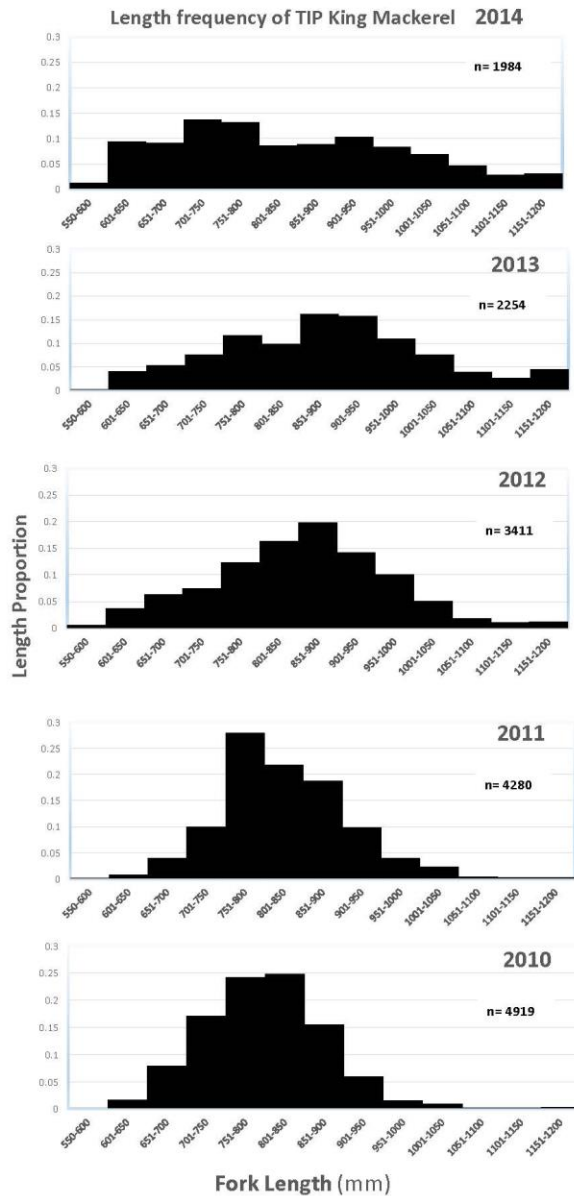
KING MACKEREL ASSESSMENT REVIEW

The SEDAR 38 Review Panel recognized that the model for the South Atlantic stock spawner-recruitment relationship was incoherent, and instructed NMFS-Science Center analysts to set steepness at an upper-boundary and change the stock status benchmark of $F_{msy} = SPR30\%$. Hence, we are aware that the SSC needs reliable information on "recruitment" into the fishery as stock projections are made. We provide, below, plots of NMFS- Trip Intercept Program data on South Atlantic King mackerel length frequencies from 2010-2014. These data were pooled in a FL/GA spatial block from Palm Beach Co., FL to Savannah, GA and represent random samples of landed fish, from the Atlantic King mackerel stock in a time block from January 2010- July 2014. Unfortunately, NMFS confidentiality rules prevented a substantive data set to provide analysis of length frequencies from pooled SC/NC data; however, SEDAR 38 recognized the FL/GA zone has the most significant recruitment in the South Atlantic. The series of annual length frequency plots, below, clearly indicates the movement of strong King mackerel cohorts moving through the population; and clear evidence of a strong 2014 cohort of young adults (age 2 and 3) moving into the fishery. Coupled with a significant and prodigious Spawning Stock Biomass (SSB), these fishery and population dynamics are typical of a productive coastal migratory pelagic stock that is cyclic, where successful and strong recruitment classes are more dependent on environmental factors than standing SSB. Hence, we encourage the SSC to consider this information as you develop stock projections for this prodigious and productive South Atlantic fishery stock.

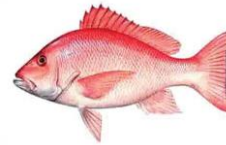
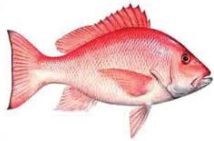
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SNAPPER GROUPER REGULATORY AMENDMENT 16

"Regulatory Amendment 16 includes one action to address the prohibition on the use of black sea bass pots that was implemented through Regulatory Amendment 19 and became effective on October 23, 2013." "The Council will review the analyses for this amendment at their December 2014 meeting. Public hearings will be held in January 2015, and the amendment will most likely be approved for submission to the Secretary of Commerce at the Council's June 2015 meeting. The SSC is asked to provide technical review of the analyses prepared by Southeast Regional Office staff."

SFA ECFS has reviewed the SSC right whale interactions presentation and it does not provide clarity as to whether or not the BSB pot vertical lines represent a realistic threat to migrating right whales. It is our contention that changes, implemented by the SAFMC and NMFS, have already reduced the risk to right whales by limiting the participation to 32 endorsement owners, reduced the allowable pots to 35, set the trip limit at 1,000 pounds gutted weight and the mandate to remove the BSB pots at the end of the fishing trip to be returned to the dock with the vessel. In fact, this fishing gear is closely tended by the vessel captain and crew, creating a much safer environment for the right whale. The BSB Pot Interactions analyses does not represent the "best scientific information available (BSIA)" on the potential interaction between gear and this protected species.

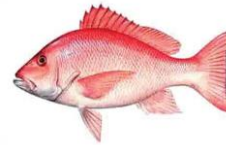
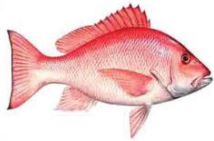
BAG LIMIT ANALYSIS

"At their June 2014 meeting, the Council approved development of Regulatory Amendment 22 to address adjustments to the ABC, ACLs, and OY for gag and wreckfish based on results of the stock assessment for those two species."

SFA ECFS supports the recommended adjustments for the ABC, ACLs and OY for gag grouper and wreckfish based on the recent stock assessments for both species.

"The SSC is also provided this opportunity to review bag limit methods in general, and provide recommendations on the adequacy of the approaches used. This request is made for two reasons. First, in trying to streamline SSC operations several years ago the Council agreed that it was not necessary for the SSC to review each and every amendment in its entirety, as had been the practice to that point. Instead SSC review efforts are directed to specific technical analysis of management actions. Bag limits are a clear example of such analyses. Second, during an earlier review of a black sea bass bag limit analysis, conducted in March 2011, the SSC decline to review the method in general due to delayed receipt of the analytical report. During that review the SSC explicitly stated that a consensus position was not developed, and provided broad comments on the application. Allowing the SSC to review current bag limit methods and

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explicitly stating that they are adequate and based on BSIA principles will streamline review of future analyses applying those methods to particular stocks. Bag limit analyses for gag and blueline tilefish are provided to support this discussion. These represent a range of bag limit change options, with gag addressing an increase and blueline tilefish a decrease."

SFA ECFS submitted comment to the SSC at the previous meeting with regard to blueline tilefish assessment data issues that merit re-examination during the next assessment. We do not support the increased bag limit for gag grouper at this time to allow further time for the stock to continue rebuilding without doubling the pressure from the SAFMC recreational sector.

Jimmy Hull, Chairman
SFA ECFS