

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

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South Atlantic  
Fishery Management Council

November 20, 2009

Charles Duane Harris, Chairman  
South Atlantic Fishery Management Council  
Southpark Building, Suite 306  
1 Southpark Circle  
Charleston, SC 29407

Re: Comments on Public Hearing Summary - Amendment 18 to the Snapper-Grouper FMP

Dear Chairman Harris:

Thank you for the opportunity to comment on the Public Hearing Summary of Amendment 18 to the Snapper-Grouper Fishery Management Plan (FMP). We appreciate your Council's thoughtful consideration of our concerns regarding the need for governance structures that would provide for the development of regionally appropriate management measures for the deepwater snapper/grouper fishery in the Mid-Atlantic region, and the Mid-Atlantic Fishery Management Council (MAFMC) is pleased to support Alternative 3 under Action 1 (Extend Snapper Grouper FMU Northward) of Amendment 18 to the Snapper Grouper FMP. As you are aware, Alternative 3 under Action 1 states:

**Alternative 3:** *Extend the management boundaries for all species in the Snapper-Grouper FMU northward to include the Mid-Atlantic and New England Councils' jurisdiction (except for black sea bass, golden tilefish, and scup). The South Atlantic Fishery Management Council will specify the MSY, ABC, MSST, OFL, ACL, and ACT for species in the fishery management unit. In addition, the South Atlantic Council will specify the allocation by sectors for each species and/or fishery and by Council area. A portion of the ACL/ACT for each species and/or fishery will be allocated to the northern zone with separate allocations for the Mid-Atlantic and New England Council areas. The Mid-Atlantic Council will specify management measures to limit total mortality to the ACL/ACT specified for their area, and the New England Council will specify management measures to limit total mortality to the ACL/ACT specified for their area. The actions specified by the Mid-Atlantic and New England Councils will not have to be reviewed and/or approved by the South Atlantic Council. However, NMFS (SERO and/or NERO) must ensure that the actions will keep total mortality at or below the ACL/ACT specified for each Councils' area.*

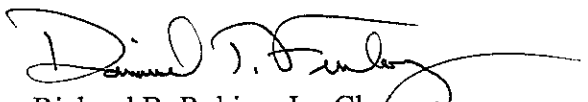
While the selection of this Alternative does reflect the Council's position at its October 2009 meeting, I would note that the Council had no other Alternatives before it when this decision was made. Our support of the Option 3 was based primarily on the fact that it satisfied the Council's desire to have a governance mechanism that would provide the MAFMC with input in the development of regionally

appropriate management measures for this fishery. Upon further review of the options, I note that Alternative 2 includes the same mechanisms on which our support for Alternative 3 was based and I believe either alternative would satisfy our concerns. Since mortality in this species complex is negligible north of New York, I anticipate that Alternative 2 would satisfy the management purposes of the proposed action with equal effectiveness.

**Alternative 2:** *Extend the management boundaries for all species in the Snapper-Grouper FMU northward to include the Mid-Atlantic Council's jurisdiction (except for black sea bass, golden tilefish, and scup). The South Atlantic Fishery Management Council will specify the MSY, ABC, MSST, OFL, ACL, and ACT for species in the fishery management unit. In addition, the South Atlantic Council will specify the allocation by sectors for each species and/or fishery and by Council area. A portion of the ACL/ACT for each species and/or fishery will be allocated to the northern zone with separate allocation for the Mid-Atlantic area. The Mid-Atlantic Council will specify management measures to limit total mortality to the ACL/ACT specified for their area. The actions specified by the Mid-Atlantic Council will not have to be reviewed and/or approved by the South Atlantic Council. However, NMFS (SERO and/or NERO) must ensure that the actions will keep total mortality at or below the ACL/ACT specified for the Mid-Atlantic Council's area.*

In either case, we would appreciate the opportunity to have our SSC leadership consult with your SSC during the ABC-setting process for the portion of the fishery management unit (FMU) within the Mid-Atlantic region. We look forward to continuing to work closely with the SAFMC to ensure that these fisheries are appropriately managed throughout the range. Grateful for your responsiveness to our Council's concerns and for your kind consideration on these important issues, I remain

Very truly yours,

  
Richard B. Robins, Jr., Chairman  
Mid-Atlantic Fishery Management Council

Cc: Patricia A. Kurkul  
Joel G. MacDonald  
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