

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

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2010 JUL 30 PM 2:53

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Vice Chairman

July 26, 2010

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FILE	_____	RECYCLE	_____		

Mr. Duane Harris, Chairman
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Chairman Harris:

Red Munden copied me with Gregg Waugh's e-mail of June 23, 2010 concerning a proposed change in wording in Draft Amendment 18 to the Snapper-Grouper Fishery Management Plan. The proposed change revises Action 1, Preferred Alternative 3 and places the responsibility for determining regulations for the northern Fishery Management Unit (FMU) with the South Atlantic Fishery Management Council (SAFMC). This is a significant modification from the wording in the May 2010 Draft Amendment 18 which placed the responsibility for development of regulations with the Mid-Atlantic Fishery Management Council (MAFMC). We sincerely appreciate the productive and collaborative dialogue that we have had with your Council throughout the development of Amendment 18, and we continue to look forward to working closely with the SAFMC to develop regionally appropriate management measures for snapper-grouper species in the Mid-Atlantic region. The proposed revisions to the preferred alternative depart from our previous discussions on this issue and we would request that the SAFMC consider restoring the preferred alternative that was identified in the May 2010 Draft Amendment 18 for the management of the northern FMU.

It has been our understanding that snapper-grouper in the northern FMU would be managed similar to Gulf of Mexico king mackerel off the East coast of Florida. In summary, the Gulf of Mexico Fishery Management Council (GMFMC) establishes the ACL/ACT for Gulf king mackerel for the East coast of Florida and the SAFMC is responsible for establishing management measures to limit total mortality to the ACL/ACT established for the fishery. Basically, the GMFMC is responsible for determining the ACL/ACT for Gulf king mackerel off the Florida East coast and the SAFMC is responsible for establishing regulations and day-to-day management of the fishery. The MAFMC supports a similar approach for management of snapper-grouper in the northern FMU.

The MAFMC expresses continued support for Action 1, Preferred Alternative 3 from the May 2010 Draft Amendment 18 document which reads as follows: **Preferred Alternative 3.** Extend the management boundaries for all species in the Snapper Grouper FMU northward to include the Mid-Atlantic and New England 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 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, NOAA Fisheries Service (SERO and/or NERO) must ensure that the actions will keep total mortality at or below the ACL/ACT specified for each Council's area." We suggest that the language above be restored as the Action 1, Preferred Alternative 3 in Draft Amendment 18.

It is our understanding that the revised Preferred Alternative 3 arose due to permitting concerns. We recommend that permit requirements be considered within the context of the management measures that are developed specifically for the northern FMU. If permits are necessary for the effective management of snapper-grouper within the northern FMU, the MAFMC could require a northern FMU snapper-grouper permit when it develops management measures. Alternatively, if the ACL is too small to provide for a fishery in the region, then no permit would be required. In either case, we suggest that it would not be necessary to impose the existing southern FMU snapper-grouper permit requirements in the northern FMU.

Thank you for the opportunity to provide comments on the preferred alternative for management of the snapper-grouper northern Fishery Management Unit, and thanks again for your attention to our Council's concerns throughout the development of Amendment 18.

Sincerely,



² Richard B. Robins, Jr., Chairman

cc: Roy Crabtree
Monica Smit-Brunello
Pat Kurkul
Joel MacDonald
John Pappalardo
Red Munden
Jack Travelstead
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