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NOAA Fisheries Service
Southeast Regional Office
Sustainable Fisheries Division
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Re: Comments on the DEIS for Amendment 17A

Dear Ms. Michie,

Protecting the commercial and recreational value and viability in the red snapper fishery is critical to the social and economic makeup of the South Atlantic's coastal communities. We understand that the National Marine Fisheries Service (NMFS) and the South Atlantic Fishery Management Council (Council) must move quickly to adopt Amendment 17A because of the legal requirements to end overfishing. The Magnuson-Stevens Fishery Conservation and Management Act requires the Council to end overfishing of red snapper and implement a rebuilding plan. However, the proposed management measures are likely to be ineffective in meeting red snapper total mortality goals and do not provide an effective long-term strategy to keep the fishery healthy.

The management measures in Amendment 17a aim to end overfishing of red snapper through the prohibition of harvest and the possession of all snapper grouper species in certain areas and could potentially have a devastating impact on all sectors of the snapper grouper fishery. Thus, we commend NFMS and the Council for its recent step towards further protection of the snapper grouper complex and commercial fishermen and recreational anglers by designating amendments 21 and 22 to the snapper grouper fishery management plan. We strongly urge the Council to include commercial and for-hire catch shares as a top priority in their development of these amendments.

Below are our comments on specific sections of the DEIS for amendment 17A:

4.3 – Red Snapper Management Measures

NMFS and the Council should not allow spearfishing in the closed areas. Current options in amendment 17A prohibit harvest of most snapper grouper species in the closed areas unless they are harvested via spearfishing. This would result in a shift in gear use to spearfishing, a method that is currently on the rise and represents 5% - 8% of snapper grouper landings (based on data provided by the Atlantic Coastal Cooperative Statistics Program). This shift in effort is likely to undermine the expected reduction in total red snapper mortality associated with the closure.

4.3.2 – Economic Effects

With the significant economic impacts outlined for all sectors in section 4.3.2, we urge NMFS and the Council to immediately begin work on amendment 22 to the South Atlantic snapper grouper fishery management plan to address long-term management and economic viability for all sectors of the red snapper fishery. We strongly recommend that catch shares be analyzed along with other management alternatives for the commercial and for-hire sectors, and we strongly recommend exploring accountability options that keep private anglers on the water while restoring the resource.

Conventional management isn't working – virtually every sector and coastal community is struggling to make ends meet while the most valuable fish populations continue to decline. Catch shares for the commercial and for-hire sectors, and innovative management for the private angler sector with significant improvements in accounting and accountability, need to be developed to end the impending prohibition on red snapper fishing. Amendment 22 should provide all sectors with the specific information needed to consider all management tools, including catch shares to achieve predictability and profitability in their business, transparency in the regulatory structure, diversity within the fishery and stability in the supply of fish for the snapper grouper complex.

4.5 – Establish a Red Snapper Monitoring Program

The Council should establish a fishery independent monitoring program to track progress of red snapper and establish a red snapper dependent monitoring program involving for-hire vessels (charter and head boats with sampling coordinated through the Southeast Fishery Science Center). A dedicated data collection program is needed to monitor the status of red snapper. The total prohibition of red snapper harvest as well as the area closure will result in a lack of fishery-dependent data leading to difficulties if not the impossibility to track recovery of red snapper in SEDAR updates and future benchmark assessments. Fishery dependent data from head boats represents the longest continuous time series for snapper grouper species and every effort should be made to maintain this continuous database. We would urge the implementation of a vessel monitoring system (VMS) as quickly as possible to determine effort in the commercial and for-hire sectors. This will not only provide an accurate accounting of efforts but also the geographic locations in which effort occurs, now and into the future as the stocks recover. Also, VMS is the foundation of dockside validation, a critical component for fisheries dependent data. Anything less than an accurate accounting of effort and verified through dockside intervention and validation would be undermining the recovery of our most valuable fisheries when they are their most vulnerable point. In sum, good science – properly collected and verified both through fishery-dependent and fishery-independent means – is critical to reducing overall uncertainty and maximizing both rebuilding and allowable catches.

However, while amendment 17A takes steps to improve data collection through establishing a fisheries independent monitoring program, with the bulk of red snapper landings coming from the recreational sector (between 2000 and 2006, the recreational sector accounted for about 72% of total red snapper landings), equivalent consideration and federal investment needs to be taken in both the

for-hire and private angler sectors. A management system is needed that improves catch accounting and fishery dependent information. Here a VMS and electronic logbook combination would enable charter and head boat operators to responsibly manage an catch share allocation of the recreational catch to their vessels, providing the flexibility needed to plan and run their business while vastly improving data collection and reporting.

Under a catch share, fishermen can potentially fish year round as long as they have quota. With catch shares in the for-hire sector, reporting standards will accurately reflect catch records and thus help end disputes over the annual harvest numbers. In the private angler sector options should be developed that improve catch accounting and reduce uncertainty in private angler harvest. A recreational tagging program will serve to connect an angler to a fish, instead of the more ambiguous approach of connecting an angler with a bag-limit. A tagging program can be low-cost, web-based, more easily enforced, and useful in gathering immediate data through a mandatory reporting process, which is critical for fisheries managers.

We recommend a catch share program for the commercial and for-hire sectors which concentrates on real-time or near real time electronic reporting systems which will advance data acquisition, reporting and analysis to support enhanced applications of science and management necessary for this multi-species fishery to recover to a sustainable level. Along these lines, catch shares quickly outperform traditional approaches, both scientifically and in terms of access to fish for fishermen. Under catch shares, the quality and quantity of fishery-dependent data skyrockets, both improving estimates of overfishing levels and significantly reducing scientific uncertainty, thus raising allowable biological catches for any given actual stock condition.

In summary, while we support the Council moving forward with Amendment 17A, we urge the Council to immediately begin work on amendment 21 and amendment 22 to the snapper grouper fishery management plan to address long-term management for red snapper and strongly recommend that catch shares for the commercial and for-hire sectors as well as other innovative solutions for the private angler be analyzed along with any other management alternatives.

Sincerely,

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