SNAPPER/GROUPER COMMITTEE: COMMENTS ON AGENDA ITEMS BY BEN HARTIG

1) COMMERCIAL QUOTA MONITORING REPORT: I would like to hear some explanation of why the golden tilefish quota was exceeded by 35% this past season. And what steps are being taken to insure that this will not happen again. The golden tilefish quota contains a provision that when 75% of the quota is landed the trip limit is reduced to 300 pounds. In the past 2 seasons, there has not been a 300 pound trip limit allowance due to the inability of the SEFSC to monitor the quota accurately. The 300 pound trip limit is important for the hook and line fishery to extend the season to allow at least some landings in a fishery that is closing earlier every year.

2) ACL AMENDMENT: Most of you have access to the Draft Minority Report which explains many of our concerns. The following comments are my own appraisal of this amendment. I have been around and contributed to the management process since its inception. I have never seen the Council approve an amendment in which all of the management implications on the recreational fishery are unknown. This is exactly what the council will do when it approves ACLs based on MRFSS and implements them based on the new MRIP methodology. One of the most disturbing aspects is that the NMFS has the results of the new MRIP methodology but the council can’t see them until after you approve this amendment. I can’t help using the phrase,”we’re from the government and we’re here to help”. I have tried to get this council to “draw a line in the sand” and reject the arbitrary timelines in this amendment. NOAA has ignored the substantial data shortcomings in the SE and is trampling all over its stated science based fishery management initiative in order to meet arbitrary timelines for ACL implementation without the necessary science based ACL formulations. Maybe I’m “oldschool”, I believe that in managing fisheries both the fish and the fishermen are part of the equation. The current management climate has removed consideration of the human element in the process.

 A) ALLOCATION: I have reviewed the minutes of the Allocation Committee from 2008 and gained insight from those discussions. If that committee met today, using their rationale, the formula would use the 1986-2010 for the long time series and 2008-2010 for the most recent, because that is the most current data set. Why aren’t we using the most recent available data in the allocation formula? This council has always tried to use the most up to date data for management decisions.

 Throughout this process I have asked the same question as we have discussed allocations for different species in this amendment. Are we being consistent in the application of Boyles Law? In each case I was assured that we were being uniform in our calculations. Consistency, in my mind, means using the entire time series in the formula. We have truncated the long time series (1986-2008) for a number of species without any compelling reason (cobia, 2000-2008; black and red grouper, 1991-2008; dolphin and wahoo, 1999-2008; porgies complex, 1999-2008). In the porgies example, it may be a necessary to incorporate a shorter time series as the older data may not have been separated to the species level. I suggest using the entire time series unless there is a compelling reason for truncation.

I have run a number of species through the council’s preferred allocation formula in an effort to understand what is driving the allocation calculations. The single most important variable is when an incredibly high recreational landings estimate occurs in the 3 year recreational portion of the formula. The commercial allocation is negatively impacted when this occurs. Extending the 3 year most recent to 5 years has variable impacts depending on the species. It does reinforce the trend in a particular fishery when trends are evident.

I have several other comments concerning allocations.

In Table 2-23 it states that the councils preferred allocation formula was used in the calculations. Does that mean that the 1986-2008 timeframe was used in each calculation? Why don’t we have allocation discussions for yellowtail and mutton snappers? Two of the most important snapper in Florida and yellowtail has the largest commercial landings of any snapper species we manage. The document does not contain any spreadsheets ( I believe dolphin and wahoo are the exceptions) or landings histories where allocation calculations can be examined. Has the fishing public been given a reasonable chance to comment on the significant changes to the amendment since the August meeting.

GOLDENTILEFISH: I suggest that we address this amendment at the next meeting as there is still considerable analysis to be completed. I will try to have suggestions to remove some of the alternatives by tomorrow. Thanks, Ben