Attachment 5 TAB11 A05 DRAFT SAFMC AllocationsTriggerLetter



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL 4055 Faber Place Drive, Suite 201, North Charleston SC 29405

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Jessica McCawley, Chair | Mel Bell, Vice Chair Gregg T. Waugh, Executive Director

> July XX, 2019 LN# 2019XX

Mr. Chris Oliver Assistant Administrator NOAA Fisheries 1315 East-West Highway Silver Spring, MD 20910

Dear Mr. Oliver:

The Fisheries Allocation Review Policy (NMFS Policy Directive 01-119) and the associated Procedural Directive on allocation review triggers (NMFS Procedural Directive 01-119-01) requested that the Regional Fishery Management Councils establish allocation review triggers and consider three types of triggers: indicator-based, public interest-based, and time-based criteria. Councils were directed to identify their allocations subject to the policy and establish review triggers i.e., select the criteria for initiating fisheries allocation reviews, by August 2019.

The South Atlantic Fishery Management Council (Council) has reviewed species allocations on numerous occasions in the past. However, if a decision was made not to modify sector allocations, it was not necessarily noted. This new policy will ensure that all species currently having sector allocations will be reviewed on a regular basis and will indicate the reasons why the Council decided the allocation was or was not revised.

The Council initially reviewed their current sector allocations and held discussions on the Policy and Procedural Directives at their December 2018 Council meeting. Initial discussions focused on species for inclusion in the policy, as well as preferred criteria for initiating fishery allocation reviews. At the March and June 2019 meetings, the Council further discussed the policy, refined allocations subject to the policy, and how allocation reviews will be implemented.

The Council decided to actively apply two types of allocation review trigger criteria:

- Indicator-based
- Time-based

The public interest-based criterion specifically was not selected because the Council currently receives regular comment from the public through scoping and public hearing sessions, general public comment periods held at every Council meeting, and opportunity for the public to contact the Council at any point through multiple channels on issues, including allocations, they believe the Council ought to consider. The Council decided this was sufficient opportunity for public interest input for requesting sector allocation reviews.

The Council adopted the following policy on allocation reviews:

Economic tools that could contribute to developing indicator-based review triggers could include cost-benefit analysis, which is used to examine changes in economic efficiency, and economic impact analysis, which is used to examine changes in employment, sales, income, and value-added at the national, regional, and state levels. Social indicators could include a range of social metrics such as community resilience, dependence, vulnerability, and well-being. Examples of ecological criteria could include undocumented sources of mortality, increases in discards, and changes in species distribution and food web dynamics. Harvest-related indicators could be one sector consistently either over or under harvesting its ACL. Additionally, the Council decided that they would consider sector allocations based on the results of fishery stock assessments.

Should a public interest or indicator-based review not occur, the Council chose to review all allocations based on a minimum amount of elapsed time. **Table 1** shows species managed by the Council in which there are sector allocations. Speckled hind and warsaw grouper have sector ACLs in place, however, the ABC currently allows no harvest of these species. They are included in **Table 1** in case the stock status changes that will allow future harvest. **Table 1** groups species by whether they are assessed, unassessed, or are part of a species complex. Additionally, columns in the table show when species last had their allocations modified by putting them into three time-based groupings: prior to 2013, in 2013 (Snapper Grouper Regulatory Amendment 13), or after 2013.

Assessed species with allocations set prior to 2013 will be reviewed every X years with the next allocation review set to begin in 20XX, unless reviewed sooner. Unassessed species and the other species groupings will be reviewed every X years. The following species will have their allocations reviewed using the time-based criteria in 20XX, if not sooner due to other criteria: XXXXXX.

The Council will publish this policy on allocation reviews on its website and looks forward to working with the Southeast Regional Office and Science Center staff to set the schedule for the allocation reviews. The Council will establish a working group that will help it identify information needed to determine whether and how a sector allocation will be modified in its published policy.

Sincerely,

Jessica McCawley Chair

Cc:

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Assessed Species	Pre-2013	2013	Post-2013	
Black grouper	Х			
Black sea bass	Х			
Blueline Tilefish	Х			
Gag	Х			
Golden tilefish	Х			
Gray Triggerfish			Х	
Greater amberjack	Х			
GA-NC Hogfish			Х	
FLK/EFL Hogfish			Х	
Mutton Snapper	Х			
Red grouper	Х			
Red porgy	Х			
Red snapper	X			
Snowy grouper			x	
Vermilion snapper	X			
Wreckfish	X			
Yellowtail Snapper	Х			
Atlantic Group King Mackerel	Х			
Atlantic Group Spanish Mackerel	Х			
Atlantic Group Cobia	Х			
Gulf Group Cobia- FL East Coast Zone	Х			
Unassessed Species				
Atlantic Spadefish		Х		
Bar Jack		Х		
Scamp		Х		
Speckled hind*	Х			
Warsaw grouper*	Х			
Deepwater Complex				
Yellowedge Grouper		Х		
Silk Snapper		Х		
Misty Grouper		Х		
Sand Tilefish		Х		
Queen Snapper		Х		

Table 1. Species with sector allocations and date of most recent allocation.

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Blackfin Snapper		Х	
	Year of Current Allocation		
Jacks Complex	Pre-2013	2013	Post-2013
Almaco Jack		Х	
Banded Rudderfish		Х	
Lesser Amberjack		Х	
Snappers Complex			
Gray Snapper		Х	
Lane Snapper		Х	
Cubera Snapper		Х	
Grunts Complex			
White Grunt		Х	
Sailor's Choice		Х	
Tomtate		Х	
Margate	8	Х	
Shallow-Water Groupers Complex			
Red Hind		Х	
Rock Hind		Х	
Yellowmouth Grouper		Х	
Yellowfin Grouper		Х	
Coney		X	
Graysby		Х	
Porgy Complex			
Jolthead Porgy		Х	
Knobbed Porgy		Х	
Saucereye Porgy		Х	
Scup		Х	
Whitebone Porgy		Х	
Dolphin/Wahoo			
Dolphin			Х
Wahoo		Х	
Total	19	31	5

* Species has allocations, but ACL = 0 for both sectors