

**Summary of Scoping Comments on Amendment 31 (blueline tilefish):**

Scoping comments were received during the November 7<sup>th</sup> webinar and via email during the open comment period (October 30 to November 20, 2013).

Two written comments were received.

- Consider a start date of May 1 for the blueline tilefish fishing year.
- Consider a 2000-pound commercial trip limit.
- Concern about there being no regulations on the harvest of blueline tilefish in VA and north.
- Concern about the limited amount of data for stock assessment.
- Management areas may not be a good idea.
- Opposition to any additional restrictions on blueline tilefish as the recreational catch is already only 3 fish per person.
- The implementation of additional MPAs should offer more protection to these fish and make it unnecessary to impose more restrictions on catching them.
- Concern over some of the commercial landings representing golden tilefish instead of blueline (Snapper Grouper AP comment).

I am opposed to any additional restrictions on Blue Line Tilefish as the recreational catch is down to only 3 fish per passenger already. I find good numbers of tilefish on the places we traditionally have caught them. The implementation of additional MPA's should offer more protection to these fish and make it unnecessary to impose more restrictions on catching these fish.

Capt. Bobby Freeman

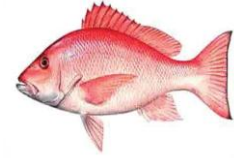
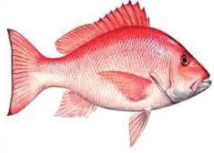
Sunrise Charters Atlantic Beach LLC

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Atlantic Beach, NC 28512

252 726 9814

# SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



## EAST COAST FISHERIES SECTION (ECFS)

Mr. Robert Mahood, Executive Director  
South Atlantic Fishery Management Council  
4055 Faber Place Dr, Suite 201  
North Charleston, SC 29405

Date: Wednesday November 20, 2013

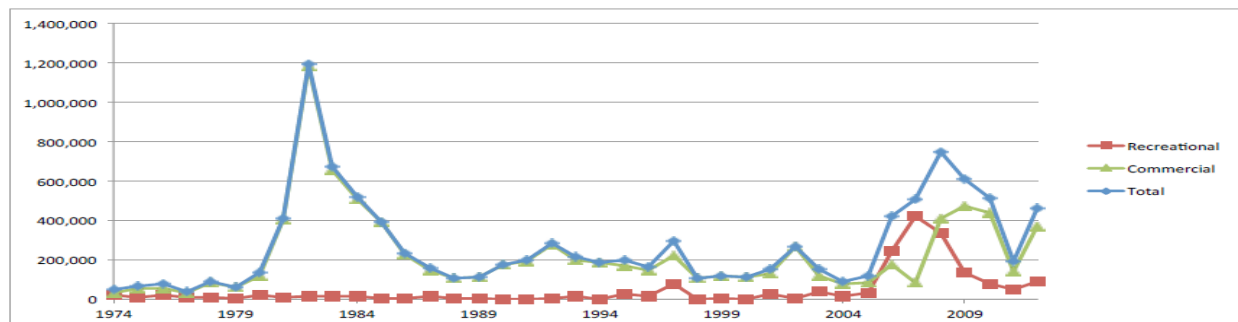
Re: Snapper Grouper Amendment 31<sup>1</sup> for Blueline tilefish [SGAmend31Comments@safmc.net](mailto:SGAmend31Comments@safmc.net)

Mr. Mahood,

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) is submitting this written comment to the South Atlantic Fishery Management Council (SAFMC) about the scoping decision document for the Snapper Grouper (SG) Amendment 31 seven proposed actions and alternatives for Blueline tilefish.

The SFA ECFS membership includes commercial fishermen with experience fishing Blueline tilefish offshore of Florida and they have always viewed it as a small bycatch component of the directed fishery for Snowy groupers that ended after 2006 with the setting of a small trip limit that is currently 100 pounds, down from 2,500 pounds. Historically fishermen targeted Snowy groupers originally with bandit reels and then beginning about 1981-1982 began using bottom longline gear, usually in 200 to 300 feet in depth until 1992.

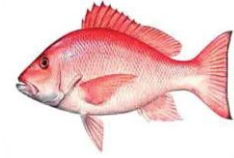
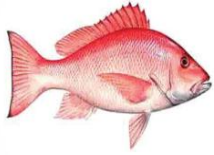
With that said, SFA ECFS has a data issue with Figure 3, on page 11 of the Amendment 31 scoping document pasted below, in particular with the commercial Blueline tilefish landings for 1981-1986. We believe there may be a significant amount of Golden tilefish landings potentially blended in to those totals since the bottom longline offshore of the east coast of Florida began landing large amounts of Golden tilefish during February 1981. This activity continued for several years until a number of those boats either shifted to the Gulf of Mexico to catch shallow water groupers, or to the directed shark fishery that ramped up about 1986 continuing through the early 1990's.



Our question is "How was the Blueline tilefish data accurately gathered by the National Marine Fisheries Service (NMFS) during a time in Florida when trip tickets were not used until 1986? Further

<sup>1</sup> <http://www.safmc.net/sites/default/files/meetings/pdf/Public%20Hearings%20&%20Scoping/Nov%202013%20-%20webinars/SGAm31ScopingDoc103013.pdf>

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## EAST COAST FISHERIES SECTION (ECFS)

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commercial logbooks did not get mandated by NMFS until 1992, the same year bottom longline was banned inside of 300 feet of depth for fish stocks in the snapper grouper complex?” That would only leave some type of wholesale dealer reporting on a state level monthly.

SG Amendment 31 is considering the following actions;

The Council is considering the following actions in Amendment 31:

- Re-define Maximum Sustainable Yield for blueline tilefish
- Re-define Minimum Stock Size Threshold for blueline tilefish
- Establish a rebuilding schedule for blueline tilefish
- Establish a rebuilding strategy and Acceptable Biological Catch for blueline tilefish
- Establish Annual Catch Limits, Optimum Yield, and recreational Annual Catch Target for blueline tilefish
- Establish an Acceptable Biological Catch, Annual Catch Limits, Optimum Yield, and recreational Annual Catch Target for remaining species in the deepwater complex
- Establish blueline tilefish management measures for each sector

The current SouthEast Data, Assessment and Review (SEDAR 32) final report for Blueline tilefish has yielded an overfished status, with an overfishing condition that could cause a significant reduction of the current acceptable biological catch (ABC). The ABC was recently revised with SG Regulatory Amendment 13 and set at 631,341 pounds whole weight, yielding 50.07 % commercial and 49.93% recreational allocations. The SEDAR 32 change will result in much smaller annual catch limits (ACLs) for both of the fishing sectors, causing early closures and very limited access to the resource.

The SFA ECFS opposes this downward change to the ABC and ACLs. We strongly suggest that a SEDAR 32 “sensitivity run” needs to be conducted by NMFS as soon as possible to potentially reduce the data inputs from 1981-1986. This effort should be provided to the SAFMC Scientific and Statistical Committee (SSC) in time for the April 2014 meeting to provide another review and reconsideration of the low ABC.

The recent SSC review held during October 2013 was conducted without the NMFS analysts in attendance as is normal protocol and was due to the 16-day federal government shutdown over budget conflicts. SFA ECFS believes this is an error of process and will affect the fishery stakeholders by saddling them with a poor assessment, causing more negative economic issues.

Under these conditions, the SFA ECFS opposes providing any further comment on the seven actions found in the current SG Amendment 31 at this time. Until a solution is developed to protect the fishing industry that depends on Blueline tilefish, we feel that the NMFS science is once again failing SAFMC fishermen.

Jimmy Hull, Chair  
SFA ECFS  
jgh/rhh