

**SUMMARY OF COMMENTS ON THE COMPREHENSIVE ANNUAL CATCH
LIMIT AMENDMENT FROM SCOPING
PERTAINING TO SNAPPER GROUPER ISSUES**

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The Council solicited comments on Comprehensive Annual Catch Limit Amendment. This document serves to summarize the comments received.

General

- Supports ACL Comprehensive Amendment and supports work with the SSC to determine the ACLs.
- Existing draft of Amendment 17 (December version) as drafted by the staff presents a well-thought out and elegant system of implementing the ACL requirement and we think it is fully compliant with the Congressional and NOAA Fisheries mandates. We encourage the Council to use the framework system of ACLs, ACTs, and AMs proposed generally as in the draft Amendment 17 document.

ACLs

- ACLs/ACTs should be done by state.
- ACL should be divided by the states according to historical harvest; ACL should be managed by the states.
- The amendment should include Control Rules for ABCs, ACLs (if a consideration), and ACTs (if a consideration). The control rules should account for management and scientific uncertainty.
- The amendment should describe how the process how ACL would be updated.

Allocations

- Allocations should be done on long-term, historical basis.
- For-hire should be included in recreational.
- For-hire operator was in favor of separating for-hire and private recreational.
- For-hire and private recreational should be separate. No way to keep track of recreational sector and better accountability of the headboat sector.
- Charter captains should be given their own allocations.

Ecosystem Component

- Should include designation of certain species as Ecosystem Components. Strongly against removing species from FMU as anything that is retained for any purpose – including bycatch and dead discards – needs to be considered. Only 11 of 73 species are historically broken out in the recreational data. Difficult to establish history of landing for most of these species. There is a risk of designating something as Ecosystem Component if the species is ignored and species could become targeted that weren't targeted before. Council should implement some mechanism to enforce designation of ecosystem species. As an example, there could be a group cap for porgies to track landings. This would not be the same as species groupings. It would be a management cap and not a scientific cap.

Accountability Measures

- Recreational fishermen have overproduced by 300% each year. If you put a quota on the recreational fishermen, there is no way to track it and shut them down.
- Should include accountability measures when fisheries are expected to meet the targets. Should be accountability measures for failed rebuilding timelines.

Management Measures

- Change the trip limit of greater amberjack from 1000 to 2000 pounds a trip since the quota has often not been filled.
- Objects to restrictions to the recreational sector while there is a commercial fishery.
- Objects to any commercial landings while there is a reduction of the recreational landings.
- Object to limits and targets put into place until reliable data collection system put into place (MRFSS not collecting reliable data).
- Stick with daily trip limits and closed areas/seasons in order to discourage highgrading and discards.
- Best thing that could be done are area closures.
- Should develop a lottery system for goliath grouper that would allow catch.
- Prohibit all commercial spearfishing.