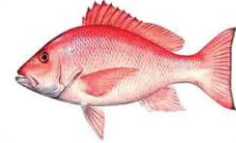
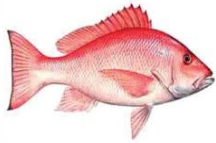


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

August 18, 2014

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

**Email comments to: Mike.Collins@safmc.net
(Subject line: Amendment 32 comments)**

Re: Snapper Grouper Amendment 32 Blueline Tilefish

Mr. Mahood,

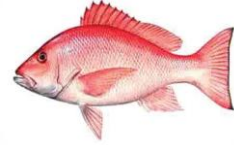
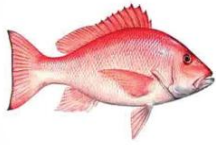
The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) regarding the proposed Snapper Grouper (SG) Amendment 32 for the Blueline Tilefish stock. We share the concerns of several Council members about problems with SEDAR 32; and, likewise, believe that the status of this fish stock was not accurately assessed with the result being, overfished.

Again, we agree with the Council's recognition that the SEDAR 32 Blueline tilefish stock assessment was flawed, as the result of significant data issues. As a result, we look forward to the recently scheduled Standard Assessment with a 2014 terminal year¹.

However, the flawed SEDAR 32 assessment has resulted in severe Emergency rule action, resulting in current closures and massive reductions in the acceptable biological catch (ABC). These management actions have resulted in economic loss for those previously active in this fishery from North Carolina south to Florida. The problems with SEDAR 32 and the resulting management actions are unacceptable; especially since we have pointed out the obvious problems with the historical landings data. Specifically, we know that putative Blueline Tilefish landings from the early 1980's were misreported Golden Tilefish landings from that significant targeted fishery, and not Blueline tilefish, a bycatch species at that time. Both bottom longline and the hook & line (bandit) fishing gears landings data is biased in the SEDAR 32 database. These problems were shown in our written comment to the SAFMC SSC during the April 2014 meeting. We are including the Blueline tilefish comment on projections with this written comment.

¹ <http://safmc.net/sites/default/files/meetings/pdf/Council/06-2014/Comm%20Reports/FINAL/SEDARCommFINALReportJun14.pdf> Final June 2014 SEDAR Committee Report

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



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In hindsight, the Blueline tilefish and Snowy grouper should have been assessed together at a SEDAR stock assessment, collectively, as these deep water species co-exist throughout most of the range and depths. They should be reassessed next year at the same venue as the SAFMC moves forward in its plan to reassess Blueline Tilefish. Fishermen throughout the South Atlantic know that the data utilized for both species needs further scrutiny in the stock assessment process..

With regard to the proposed SAFMC SG Amendment 32 actions, in general, we are not content with the quality of the science being utilized to assess this and other data poor species. The SAFMC's SSC should have requested the SEFSC to immediately produce alternative models to deal with obvious data issues following the SEDAR 32 assessment process. See our quote, below, on Blueline tilefish from the SAFMC SSC meeting.

"The independent reviewers at the SEDAR 32 RW questioned the validity of MRIP recreational landings data used to construct a record of recreational fishing landings. The RW was addressed by fishing industry representatives that cast serious doubt over the veracity of the MRIP Blueline Tilefish landings history (see DW figure 4.11.1 below). The unreliability of MRIP estimates is particularly concerning during the recent expansion of the fishery north of Cape Hatteras from 2006 to 2008, including some elevated discard data from 2007. Further, we believe that SEDAR 32 did not effectively address anomalous annual commercial landings records during the 1980's where Blueline Tilefish were likely confused with Golden Tilefish in reporting, before institution of the Trip Ticket reporting system (from DW Fig. 3.4)."²

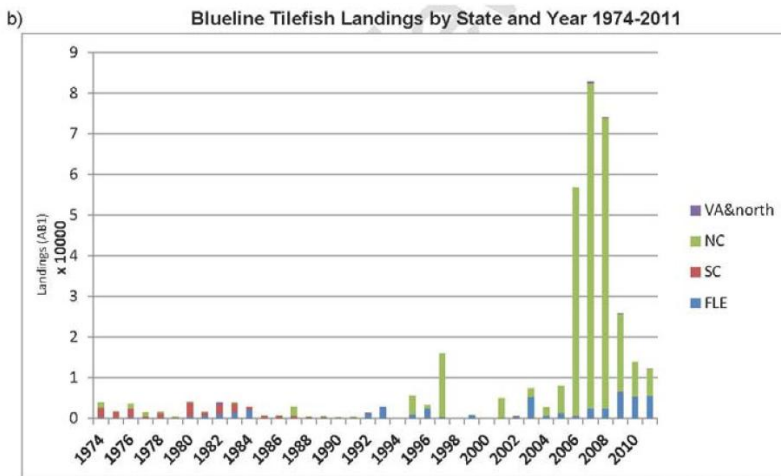
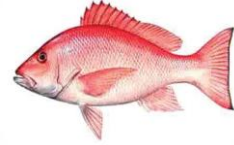
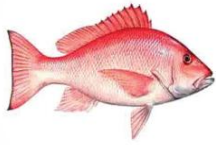


Figure 4.11.1. Estimated number of Atlantic blueline tilefish landings from MRFSS/MRIP (1981-2011) and SRHS (1974-2011) by state (a), by state and year (b), and by state and mode (c). Florida landings from east coast only, including Florida Keys. Due to confidentiality concerns SRHS landings for GA and FLE are grouped and shown as FLE.

² SFA ECFS comment to the SAFMC SSC during the April 2014 meeting
<http://safmc.net/meetings/briefing-book-ssc-meeting-april-29-may-1-2014>

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

April 2013

South Atlantic Blueline Tilefish

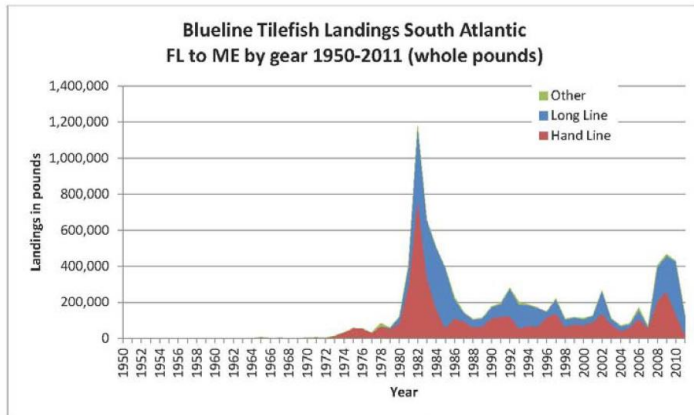


Figure 3.4 Blueline tilefish landings, in whole weight pounds, for all states (FL-ME) by gear.

Pasted below are the SAFMC actions that contain various alternatives from the SG Amendment 32 public hearing document, some of which the SFA ECFS agrees with the preferred, unless otherwise indicated.

1) Composition of the Deepwater Complex

SFA ECFS supports the changes created by Action 1, Alternative 2 Preferred

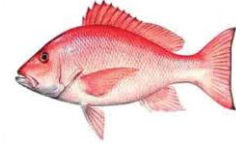
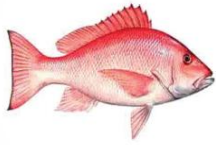
"**Alternative 2 (Preferred).** Remove blueline tilefish from the Deepwater Complex. Revise the Deepwater Complex annual catch limits, optimum yield, and recreational annual catch targets to reflect the removal of blueline tilefish. **Retain ACL=OY=ABC for the Deepwater Complex.** Retain recreational ACT equals $ACL \cdot (1 - PSE)$ or $ACL \cdot 0.5$, whichever is greater for the Deepwater Complex."

"The following alternatives are being recommended for the Council to review at their September 2014 meeting."

2) Maximum sustainable yield (MSY)

SFA ECFS supports the changes created by Action 2, Alternative 2 Preferred

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

	Equation	F _{MSY}	MSY Values (pounds whole weight)
Alternative 1. No Action	Do not change the current definition of MSY for blueline tilefish. Currently, MSY equals the yield produced by F _{MSY} . F _{30%SPR} is used as the F _{MSY} proxy.	F _{30%SPR} =0.356	not specified
Alternative 2. Preferred	MSY equals the yield produced by F _{MSY} or the F _{MSY} proxy. MSY and F _{MSY} are recommended by the most recent SEDAR/SSC.	0.302	226,500

3) ACLs and optimum yield (OY)

SFA ECFS supports the changes created by Action 3, Alternative 3 Preferred

" **Alternative 3 (Preferred)**. Establish annual catch limits for blueline tilefish. **The blueline tilefish ACL = OY = 98%ABC**. Specify commercial and recreational ACLs for blueline tilefish for 2015, 2016, 2017, and 2018 and beyond. The annual catch limit for 2018 will remain in effect until modified. Annual catch limits in 2016, 2017, and 2018 will not increase automatically in a subsequent year if present year projected catch has exceeded the total annual catch limit. Specify commercial and recreational annual catch limits based on existing sector allocations (50.07% commercial and 49.93% recreational)."

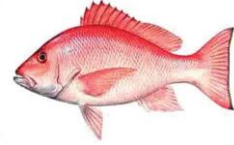
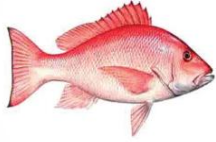
Year	Blueline Tilefish ACL (pounds ww)		
	Total	Commercial	Recreational
2015	35,632	17,841	17,791
2016	53,457	26,766	26,691
2017	71,469	35,785	35,685
2018 and beyond until modified	87,974	44,048	43,925

4) Recreational annual catch target (ACT)

SFA ECFS supports the changes created by Action 4, Alternative 2 Preferred

"**Alternative 2 (Preferred)**. Establish an annual catch target for blueline tilefish for the recreational sector that equals the recreational ACL*(1-PSE) or ACL*0.5, whichever is greater."

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

Year	Blueline Tilefish ACT (pounds ww)		
	Action 3; Alternative 2 (ACL=ABC)	Action 3; Preferred Alternative 3 (ACL=98%ABC)	Action 3; Alternative 4 (ACL=90%ABC)
2015	11,368	11,141	10,231
2016	17,055	16,714	15,350
2017	22,802	22,346	20,522
2018 and beyond until modified	28,067	27,506	25,261

Note: Calculations use the most recent 5 years of recreational landings to obtain the PSE.

Blueline Tilefish PSE	
Year	
2009	35.6
2010	27.8
2011	43.6
2012	27.8
2013	52.1
Average	37.38

5) Commercial accountability measures (AM)

SFA ECFS supports the changes created by Action 5, Alternative 2 SubAlt 2c Preferred

SFA ECFS supports the changes created by Action 5, Alternative 4 SubAlt 4b Preferred

"Alternative 2 (Preferred). Specify the following in-season and post-season accountability measures for blueline tilefish and the Deepwater Complex for the commercial sector: If commercial landings as estimated by the Science and Research Director reach or are projected to reach the commercial ACL, the Regional Administrator shall publish a notice to close the commercial sector for the remainder of the fishing year.

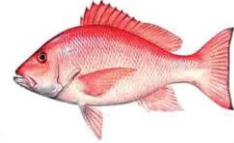
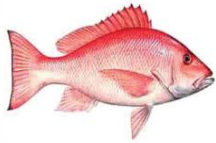
On and after the effective date of such a notification, all sale or purchase is prohibited and harvest or possession of this species in or from the South Atlantic EEZ is limited to the bag and possession limit. This bag and possession limit applies in the South Atlantic on board a vessel for which a valid Federal commercial or charter vessel/headboat permit

for South Atlantic snapper grouper has been issued as appropriate, without regard to where such species were harvested, i.e., in state or Federal waters. Additionally,

Sub-alternative 2c (Preferred). If the commercial ACL is exceeded, the Regional Administrator shall publish a notice to reduce the commercial ACL in the following fishing year by the amount of the commercial overage, only if the species is overfished and the total ACL (commercial ACL and recreational ACL) is exceeded.

Note: For the Deepwater Complex, at least one of the species would need to be overfished."

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



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6) Recreational AMs

SFA ECFS supports the changes created by Action 6, Alternative 2 SubAlt 2c Preferred

SFA ECFS supports the changes created by Action 6, Alternative 4 SubAlt 4b Preferred

"Alternative 2 (Preferred). Specify the following post-season accountability measures for blueline tilefish and the Deepwater Complex for the recreational sector: If recreational

landings, as estimated by the Science and Research Director, exceed the recreational ACL, then during the following fishing year, recreational landings will be monitored for a persistence in increased landings.

Sub-alternative 2c (Preferred). If necessary, the Regional Administrator shall publish a notice to reduce the length of fishing season and the recreational ACL in the following fishing year by the amount of the recreational overage, only if the species is overfished **and** the total ACL (commercial ACL and recreational ACL) is exceeded. The length of the recreational season and recreational ACL will not be reduced if the Regional Administrator determines, using the best scientific information available, that a reduction is unnecessary."

"Alternative 4 (Preferred). If recreational landings reach or are projected to reach the recreational annual catch limit, National Marine Fisheries Service will file a notification with the Office of the Federal Register to close the recreational sector for the remainder of the fishing year, unless, using the best scientific information available, the Regional Administrator determines that a closure is unnecessary."

"Sub-alternative 4b (Preferred). Regardless of stock status."

7) Commercial management measures

SFA ECFS supports the changes created by Action 7, Alternative 2 Preferred

"Alternative 2. Establish a commercial trip limit for blueline tilefish of 100 pounds gutted weight (gw)."

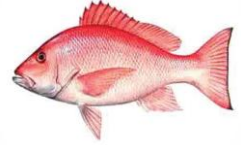
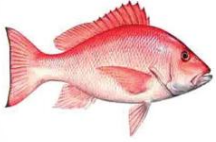
8) Recreational management measures

SFA ECFS supports the changes created by Action 8, Alternative 6 Preferred because it allows for the MRIP Wave 3 May/June to be measured year to year

"Alternative 6. Establish a vessel limit of blueline tilefish of 1/vessel/day year during May and June with no retention during the remainder of the year."

Jimmy Hull, Chairman

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

SFA ECFS