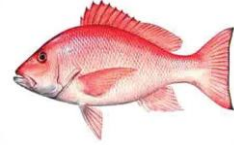
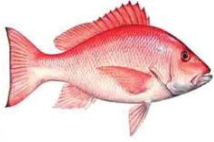


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



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: Accountability Measures and Dolphin Allocation comments)

Re: Snapper Grouper Amendment 34 and Dolphin Wahoo Amendment 8

Mr. Mahood,

The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) about the proposed rules for Snapper Grouper (SG) Amendment 34 accountability measures and Dolphin Wahoo Amendment 8 in particular. SFA ECFS supports the Preferred Alternatives found in this Amendment.

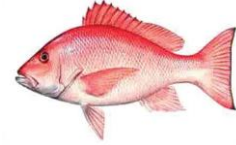
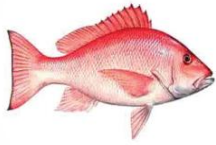
The Council is considering the following actions in these Amendments:

• **ACTION 1:** *Define the stock status criteria required for implementing accountability measures for snapper grouper species and golden crab*

***Alternative 2.** 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, dolphin wahoo, or golden crab has been issued as appropriate, without regard to where such species were harvested, i.e., in state or Federal waters. Additionally,*

***Preferred Sub-alternative 2c.** 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.*

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Alternative 3. *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.*

Preferred Sub-alternative 3c. *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.*

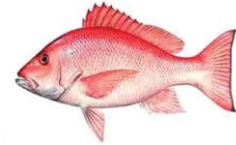
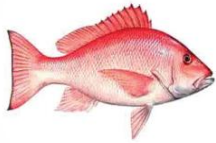
Alternative 4. *If recreational landings reach or are projected to reach the recreational annual catch limit, National Marine Fisheries Service will file a notification with the Office of the Federal Register to close the recreational sector for the remainder of the fishing year, unless, using the best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

Preferred Sub-alternative 4b. *Regardless of stock status.*

Table 1. Unassessed snapper grouper species addressed in this action.

Unassessed Snapper Grouper Species	Commercial ACL (lb ww)	Recreational ACL (lb ww)
Jacks	189,422	267,799
Almaco jack	147,322	155,195
Banded rudderfish	37,829	107,605
Lesser amberjack	4,270	5,000
Snappers	215,662	728,577
Gray snapper	192,830	602,213
Lane snapper	17,695	102,289
Cubera snapper	4,829	19,851
Dog snapper	273	3,012
Mahogany snapper	36	512
Grunts	218,539	588,113
White grunt	212,896	461,136
Sailors choice	0	22,674
Tomtate	0	80,056
Margate	5,643	24,246
Shallow Water Groupers	49,776	46,656
Red hind	18,303	6,564
Rock hind	23,115	14,838
Yellowmouth grouper	44	3,995
Yellowfin grouper	4,879	4,379
Coney	665	2,053
Graysby	2,771	14,827
Porgies	36,348	106,914
Jolthead porgy	1,571	36,315
Knobbed porgy	34,515	32,926
Saucereye porgy	0	3,606
Scup	0	9,306
Whitebone porgy	262	24,762

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EAST COAST FISHERIES SECTION (ECFS)

Unassessed Snapper Grouper Species	Commercial ACL (lb ww)	Recreational ACL (lb ww)
Individual Stocks		
Atlantic spadefish	35,108	154,352
Bar jack	5,265	19,515
Scamp	333,100	176,688
Hogfish	49,569	85,355
Gray triggerfish*	272,880	353,638
Species with total ACLs of Zero		
Nassau grouper	0	0
Warsaw grouper	0	0
Speckled hind	0	0
Goliath grouper	0	0

* Gray triggerfish is scheduled to for a SEDAR stock assessment beginning August 2014.

Table 2. Species not included under Action 1 and reason they are not included in the action.

Species	Amendment
Vermilion snapper	Regulatory Amendment 14 to the Snapper Grouper FMP
Gray triggerfish	Amendment 29 to the Snapper Grouper FMP
Black sea bass	Regulatory Amendment 14 to the Snapper Grouper FMP
Blueline tilefish	Amendment 32 to the Snapper Grouper FMP
Deepwater Complex	Amendment 32 to the Snapper Grouper FMP
Cottonwick	Ecosystem component species
Longspine porgy	Ecosystem component species
Bank sea bass	Ecosystem component species
Rock sea bass	Ecosystem component species
Ocean triggerfish	Ecosystem component species
Schoolmaster	Ecosystem component species

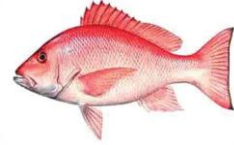
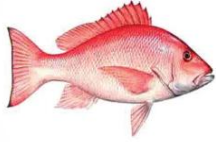
• **ACTION 2:** Allocation of dolphin between recreational and commercial sectors

Preferred Alternative 4. Set the commercial allocation at the average of the percentages of the total catch over the past 5 years (2008-2012). The recreational sector allocation for dolphin is 90%, and commercial sector allocation is 10%.

Table 3. Sector ACLs that would result under each of the alternatives considered.

Alternative	Commercial Sector ACL (lbs ww)	Recreational Sector ACL (lbs ww)
Alternative 1 (No Action)	1,157,001	14,187,845
Alternative 2	1,994,830	13,344,846
Alternative 3	2,148,278	13,196,567
Preferred Alternative 4	1,534,485	13,810,361
Sub-Alternative 5a	1,534,485	13,810,361
Sub-Alternative 5b	1,534,485	13,810,361
Sub-Alternative 5c.	1,381,036	13,963,809

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Table 4. Commercial and recreational sector landings of dolphin for 2008 through 2013.

Year	Commercial Landings (lbs ww)	Recreational Landings (lbs ww)
2008	780,818	7,833,547
2009	1,222,944	7,570,195
2010	706,281	6,243,399
2011	791,457	6,518,306
2012	687,140	6,097,292
2013	496,981	4,526,565

Note: Data from 2013 are preliminary.

Source: SEFSC Commercial and Recreational ACL Datasets (2014)

Jimmy Hull, Chairman
SFA ECFS