

Thank you for the opportunity to comment on Amendment 16 to the South Atlantic Fishery Management Council's Snapper Grouper Fishery Management Plan. The Coastal Conservation Association is a private, non-profit marine fishery conservation organization with over 97,000 members in 15 state chapters from Maine to Texas.

Most fish in this complex are long lived, slow growing species that cannot tolerate intense fishing pressure. The management history of the snapper/grouper complex is a testimony to inadequate regulations often applied too late. Past management has led us to what most fishermen now see as draconian season closures coupled with low bag limits and quotas. However, while painful, we believe these reductions are necessary to rebuild gag grouper and vermilion snapper stocks, as required by law.

Our comments are below.

Gag Grouper

Interim Gag Allocation Alternatives and Resulting Commercial Quota & Recreational Allocation

Alternative 2 (preferred). Define interim allocations for gag based upon landings from the ALS, MRFSS, and headboat databases. The allocation would be based on landings from the years 1999-2003. The allocation would be 51% commercial and 49% recreational. This alternative would establish a commercial quota of 353,940 pounds gutted weight and a recreational allocation of 340,060 pounds gutted weight.

Commercial quotas associated with allocation alternatives for gag taking into consideration estimate of PQBM.

CCA Comment: In the absence of better data to examine allocations, Alternative 2 seems the most equitable. We support Alternative 2 until a better method is devised to set allocations.

Management Alternatives for Gag

Alternative 2 (Preferred). Establish a gag spawning season closure January through April that applies to both the commercial (20% reduction) and recreational (31% reduction) sectors; no fishing for and/or possession of gag would be allowed. In addition, no fishing for and/or possession of the following species would be allowed: black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney.

CCA Comment: As long as it applies equally for both sectors, CCA supports a spawning season closure for gag grouper.

Alternative 5b. Close the month of December to recreational harvest and/or possession of gag, black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper,

tiger grouper, yellowfin grouper, graysby, and coney. This alternative would retain the existing 5-grouper aggregate bag limit and 2 gag or black grouper bag limit. The December through April closure plus the reduction in bag limits would result in a 42% reduction in harvest.

CCA Comment: CCA supports Alternative 5b. We believe the season closure provides the most effective conservation benefit to stop overfishing of gag and rebuild the stock.

Vermilion Snapper

Interim Vermilion Snapper Allocation Alternatives

Alternative 1 (no action). Do not define interim allocations for vermilion snapper.

Alternative 2 (preferred). Define interim allocations for vermilion snapper based upon landings from the NMFS landings (ALS), NMFS Marine Recreational Fisheries Statistics Survey (MRFSS), and NMFS headboat databases. The allocation would be based on landings from the years 1986-2005. The allocation would be 68% commercial and 32% recreational. This alternative would establish a commercial quota of 385,002 pounds gutted weight (427,352 pounds whole weight) and a recreational allocation of 181,177 pounds gutted weight (201,107 pounds whole weight).

CCA Comment: CCA supports Alternative 2, until such time as better allocation criteria are developed.

Management Alternatives for Vermilion Snapper

Alternative 4. Adjust recreational bag/size limit and establish a recreational closed season; no fishing for and/or possession of vermilion snapper would be allowed during the closed season; and captain/crew on for-hire vessels would not be able to retain vermilion snapper

Alternative 4d (Preferred). Reduce the bag limit from 10 to 4 vermilion snapper (45% reduction) and a season closure (no fishing for and/or possession) of October through May 15th (38% reduction) (Total reduction = 66%).

CCA Comment: CCA supports Alternative 4d. We believe the season closure provides the most effective conservation benefit to stop overfishing of vermilion snapper and rebuild the stock. In addition we are intrigued by an option with no minimum size and presume this is an effort to reduce regulatory discards. While we wonder what reducing the size/age of entry into the fishery does to the reference point calculations, it may be time to experiment with this option to see if it in fact reduces discards or just causes high grading. We believe the season closure helps mitigate any potential problems that may occur.

Reduce Bycatch of Snapper Grouper Species

Alternative 1. No Action. Do not require use of venting tools, dehooking devices, and circle hooks to reduce bycatch.

Alternative 2. Reduce recreational and commercial bycatch mortality by requiring the following for a person on board a vessel to fish for snapper grouper species in the South Atlantic EEZ: (a) use of venting and dehooking tools and (b) use of non-offset, non-stainless steel circle hooks when using natural baits to fish for snapper grouper species in one of the following South Atlantic EEZ fisheries:

Alternative 2a. Commercial snapper grouper fishery.

Alternative 2b. Recreational snapper grouper fishery.

Alternative 2c (Preferred). Both commercial and recreational snapper grouper fisheries.

CCA Comment: CCA supports Alternative 2c.

Allow NMFS Regional Administrator (RA) to Make Adjustments to Management Measures after pending Vermilion Snapper SEDAR Assessment

Alternative 1. No Action. Do not allow the Regional Administrator (RA) to adjust the management measures based on the outcome of the new vermilion snapper SEDAR benchmark assessment.

Alternative 2 (Preferred). Allow the RA to adjust the management measures as specified in Table A based on the outcome of new vermilion snapper SEDAR benchmark assessment.

CCA Comment: CCA supports Alternative 2.

We appreciate the opportunity to comment on these important fishery management options. Please feel free to contact us if you have any questions.