

Coastal Conservation Association
Comments on Amendment 18
to the Coastal Migratory Pelagic Fishery Management Plan
for the Gulf of Mexico and South Atlantic
Public Hearings
April 2011

We would like to thank the Council for giving us the opportunity to address the wide assortment of actions and alternatives proposed in Amendment 18.

Having said that, we must also express our concern that releasing the 333-page public hearing document on April 5 and scheduling the first public hearing on April 11 is not conducive to obtaining constructive input, if that is the goal of the public hearing process. CCA recognizes the pressure to meet the 2011 deadlines of the Magnuson-Stevens Act to set annual catch limits and other management measures for fisheries that are not undergoing overfishing, but the timeline for these public hearings is simply unreasonable. Allowing less than a week to review the public hearing document is unacceptable and once again casts doubt that the Council is sincere in its efforts to gather and utilize meaningful input from the recreational angling community.

The following testimony has been prepared by Coastal Conservation Association to address proposed Annual Catch Limits (ACLs) and accountability measures (AMs) for king mackerel, Spanish mackerel, and cobia. With regard to the formula the Council uses to set ACLs, CCA commends the Council for its willingness to explore a more reasonable manner of setting limits for an unassessed stock. The previous proposal to set the ACL at the median of the last 10 years landings was fraught with problems. We are more encouraged by the Council's current method of setting the ACL at the level of the third highest landings over the previous 10 years.

KING MACKEREL

With regard to Atlantic migratory group king mackerel, the stock was last assessed in SEDAR 16 in 2008. Subsequent Council action set catch limits based on that assessment and the recreational harvest of king mackerel has remained under those limits. As a result, CCA is recommending that there be no changes in the management measures currently in place for king mackerel.

Regarding the need to set an accountability measure for king mackerel as required under the Magnuson-Stevens Act in the event that the recreational sector does go over its ACL at some point in the future, CCA recommends that the Council remedy the overage by modifying the recreational bag limit, rather than enacting closed seasons on king mackerel.

SPANISH MACKEREL

CCA believes the most significant consideration for the Council in this fishery is the fact that the recreational sector has been under its limits for the past decade, and therefore we are recommending that there be no changes in the management measures currently in place for Spanish mackerel. It is also essential to note that while Spanish mackerel currently do not have an

accepted, peer-reviewed stock assessment, and are therefore subject to the new Council guidelines described earlier for setting an annual catch limit, a coastal migratory pelagic assessment for king mackerel, Spanish mackerel and cobia is scheduled for 2012.

CCA maintains that for unassessed species, unless there is clear evidence that the stock is declining, the control rule should not limit current harvest. The logical option would be to simply cap the harvest at current levels until data is available through a current assessment. Spanish mackerel are one of the most assessed species in the South Atlantic and there are no indications of trouble with the stock.

COBIA

Like Spanish mackerel, cobia is an unassessed species and is subject to the Council's new method of setting the annual catch limit at the level of the third-highest landings over the last 10 years. CCA maintains that for unassessed species, unless there is clear evidence that the stock is declining, the control rule should not limit current harvest. The logical option would be to simply cap the harvest at current levels until data is available through a current assessment.

CCA recognizes that the Council has data indicating that the recreational sector went slightly over its annual catch limit in 2010 but would like to emphasize that the Council's conservative past management of this species has produced a stock that is steadily increasing. We believe this is a situation where the stock is most likely healthy, larger year classes are entering the system and anglers are encountering cobia more often. We encourage the Council to wait for the results of the assessment scheduled for next year before considering any new management measures for cobia.

Thank you for this opportunity to present our comments on these issues.