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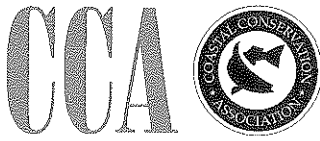
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October 3, 2011

David M. Cupka
Chairman
South Atlantic Fishery Management Council
P.O. Box 12753
Charleston, SC 29422

Dear Chairman Cupka,

The Coastal Conservation Association is alarmed about the closure of black sea bass to recreational harvest barely five months into the fishing year. We understand the legal requirements that are driving this closure and we fully support recovering this important stock, but this second closure of the fishery has caused much controversy in the recreational community.

The cumulative impacts of a complete closure on red snapper, a four-month closure for groupers, a five-month closure on vermilion snapper and now a seven-month closure in black sea bass are a bitter pill to swallow for the recreational angling community and the businesses that depend on it. We are left with very little for avid bottom fishermen to pursue in the south Atlantic, especially during the winter. Bottom-fishing trips have been a staple for recreational fishermen and these closures are cascading at a time when coastal communities have fewer tourists and are already reeling from the troubled economy.

In the case of black sea bass, it is now painfully apparent that the Council made a mistake when it approved the constant catch rebuilding strategy in 2006. While that strategy, promoted at the time by the commercial sector and the headboat industry,

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shielded those sectors from painful harvest reductions early in the rebuilding program, it subsequently shackled all participants with artificially low harvest limits that are locked in for the duration of the program (2016).

The black sea bass stock is behaving exactly as expected - it is responding to management and rapidly rebuilding. As it does, recreational anglers are encountering them more frequently and catching their quota far more quickly, resulting in the current proposal to close the fishery from October to June. If a constant F strategy had been adopted for black sea bass, harvest levels would have expanded as the stock recovered and may have been adequate to avoid a seven-month closure.

To remedy this unfortunate situation, we would offer the following:

1. If the current benchmark stock assessment allows for some increase in the total allowable catch (TAC), we ask that the increase be implemented as soon as possible. We encourage the Council to explore a further reduction in the bag limit to allow the season to extend into the winter season next year. This action would help the Council avoid unnecessarily impacting businesses and coastal economies due to a short-sighted mistake made in 2006.
2. As mentioned previously, the Council chose a constant catch strategy in 2007 at a time when very few people thoroughly understood the ramifications of the 2006 reauthorization of the Magnuson Stevens Act. It was entirely predictable that recreational catches would rise with stock abundance, yet the rebuilding strategy chosen is in direct contradiction to this. Anglers are now paying the price for that misguided decision four years ago. We urge the Council to explore a way to substitute the rebuilding strategy to allow for greater recreational quotas while still achieving the 2016 rebuilding deadline. Switching the rebuilding strategy to a constant F strategy, as opposed to a constant catch strategy, for the remainder of the rebuilding period may be a promising avenue to increase TAC, while still meeting the rebuilding goal.
3. Finally, the black sea bass assessment that is set to be presented in December will not, we believe, include sufficient fishery independent data to fully corroborate the stock status. Thus the outcome of the assessment, while peer reviewed, will be more suspect to the public. It is unconscionable that we are still managing high-value recreational fisheries without the fishery independent data necessary to corroborate the catch data. We would urge that the Council demand the resources necessary to incorporate fishery independent data to establish the greatest level of confidence in future stock assessments.

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We recognize that the Council is following its legal mandate to end overfishing and restore black sea bass. However, it appears that the Council is laboring under a self-inflicted restriction to more reasonable management measures in this fishery. We urge the Council to explore every alternative available to avoid compounding an already difficult fishery management regime in the South Atlantic.

Thank you.

Regards,

A handwritten signature in cursive script that reads "Bill Bird".

Bill Bird, Chairman
CCA South Atlantic Fisheries Committee

cc: Bob Mahood, Executive Director
South Atlantic Fishery Management Council