

Coastal Conservation Association
Comments for the SAFMC
Public Hearings and Scoping Meetings
January / February 2011

It must be pointed out that this comment process is seriously flawed given the sheer breadth and complexity of the issues that have been presented simultaneously here. This process, which involves hundreds of pages of documents on these issues, is not conducive to allowing stakeholders to develop informed decisions on the dozens of management options presented here, options that could have serious implications on the public's ability to access these public resources in the future. As presented here today, this process threatens to damage any faith that the recreational angling community may have that the Council is sincere in its efforts to gather and utilize meaningful input from us.

The following testimony has been prepared by Coastal Conservation Association to address the following four issues:

The Comprehensive ACL Amendment
Comprehensive Catch Share Amendment – Amendment 21
Snapper Grouper Amendment 22
Snapper Grouper Amendment 24

COMPREHENSIVE ACL AMENDMENT

Coastal Conservation Association has several significant concerns about the Comprehensive ACL Amendment:

- § With regard to Annual Catch Limits, CCA believes that all recreational ACLs should be measured in numbers of fish rather than pounds. This will remove some of the uncertainty and error that plagues recreational catch data.
- § We support moving species with landings of less than 20,000 pounds out of the management complex, rather than designating them Ecosystem Species. Doing so will prevent managers from being required to enact measures that may impact dozens of species in a single complex in order to recover the weakest species.
- § For unassessed species, unless there is clear evidence that the stock is declining, the control rule should not limit current harvest. It is absurd to employ an ABC control rule that would require more than a 50 percent reduction in cobia, and significant reductions in wahoo and dolphin, when no problems have been documented with the stock. The logical option would be to simply cap the harvest at current levels until data is available to support an assessment.
- § We are greatly dismayed to see that this document still looks exclusively at past landings history as the sole method to set allocations between the recreational and commercial sectors. We believe the allocation process should be forward-looking and that managers should make every effort to manage these fisheries to reflect present and future realities, rather than locking in these resources to repeat history.
The South Atlantic Fishery Management Council should use the criteria set out in the NOAA Catch Share Policy in setting any allocation and use economic value as a key criteria in order to set allocations that achieve the greatest benefit to the country.

CCA COMMENTS ON THE COMPREHENSIVE CATCH SHARE AMENDMENT (Amendment 21)

This testimony once again states CCA's long-standing position with regard to catch shares:

- § CCA is opposed to catch shares for recreational fisheries. NOAA's own Catch Share Policy states that catch shares are not an appropriate management option for recreational fisheries.
- § CCA acknowledges that catch shares may be a valid management tool in purely commercial fisheries to reduce overcapacity and address bycatch issues.
- § CCA has grave reservations about the use of catch shares for the commercial sector in mixed-use (recreational and commercial) fisheries. Catch shares systems are not appropriate tools for the recreational sector in mixed-use fisheries.
- § Before the implementation of a catch share system for the commercial sector of a fishery, CCA wants managers to reallocate the fishery based on economic, social and conservation parameters as outlined in NOAA's own Catch Share Policy.
- § After reallocation, the catch share system for the commercial sector should be designed so that commercial catch shares are available for transfer by states or other such entities to the recreational sector.
- § If a catch share system is installed for the commercial sector of a fishery, then the fishery should be scheduled for regular reevaluation, including reallocation.
- § The commercial participants in any catch share program should pay some form of ongoing resource rent to pay the expense of managing the catch share program and repay the public for the exclusive use of a common property natural resource.

SNAPPER GROUPE AMENDMENT 22

CCA is alarmed by almost every section in Amendment 22, and believes the entire Amendment should be scrapped. It is our opinion that the Council should go back to the drawing board and start over. In general, CCA believes that following points should be used as guiding principles in the creation of a new Amendment:

- § CCA believes the Council should re-open the red snapper fishery when the population would support a viable fishery, at the very least similar to the one that existed when the fishery was closed, rather than reopen the fishery prematurely in a limited fashion using any of the extraordinary management measures described in this current amendment. Seasons, bag and size limits have worked well when properly applied and will do so here.
- § CCA is categorically opposed to any recreational catch share program. NOAA's own Catch Share Policy, released in 2010, states that catch share programs have no place in recreational fisheries.
- § CCA is opposed to a commercial red snapper catch share program unless NOAA and the Council follow NOAA's own Catch Share Policy in the design and implementation of it, including:
 - § Reallocation of the fishery based on economic, social and conservation parameters;
 - § Adoption of a mechanism that allows commercial catch shares to be acquired by states or other such entities for transfer to the recreational sector;

- § Establishment of a schedule for regular reevaluation of the fishery, including reallocation;
- § Implementation of an ongoing resource rent system so that the commercial sector pays both the expense of managing its own catch share program and pays the public for the exclusive use of a common property natural resource.
- § Finally, regardless of any management option selected, CCA believes the Council should examine the allocation of this fishery based on social, economic and conservation factors. CCA believes that the greatest economic benefits to the country can be achieved by having the South Atlantic red snapper fishery reopen as a recreational-only fishery.

SNAPPER GROUPEL AMENDMENT 24

With regard to this amendment, CCA would emphasize the following points:

- § We favor a constant F strategy for rebuilding the red grouper stock. This strategy allows catches to increase as the stock rebuilds, as opposed to constant catch strategies that allow for a greater harvest in the beginning of the rebuilding plan, but lock in a lower limit as the stock rebuilds at the end of the plan.
- § Our central concern with this Amendment revolves around the sector allocations. We support a 2 sector allocation, recreational and commercial. We are opposed to any option that proposes to separate the recreational sector between private boat anglers and charterboats/headboats.
- § CCA is alarmed by almost every allocation alternative in Amendment 24. The document still looks exclusively at past landings history as the sole method to set allocations. CCA believes the allocation process should be forward-looking and that managers should make every effort to manage these fisheries to reflect present and future realities, rather than locking in these resources to repeat history. The South Atlantic Fishery Management Council should use the criteria set out in the NOAA Catch Share Policy in setting any allocation and use economic value as a key criteria in order to set allocations that achieve the greatest benefit to the country.