



September 22, 2018

Jessica McCawley, Acting Chair
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Jessica,

I write to ask the South Atlantic Fishery Management Council to delay the Annual Catch Limit adjustments for black sea bass proposed in Snapper-Grouper Abbreviated Framework Amendment 2 until such time as the recalibrated MRIP landings estimates for black sea bass are available.

The delay would also provide fishery stakeholders more time to become aware of the proposed adjustments and for scrutiny of the black sea bass stock assessment.

The proposed total black sea bass ACL for 2019 would be 57 percent lower -- nearly 1 million lbs. -- than the current ACL, even though black sea bass are not overfished or experiencing overfishing. The total black sea bass ACL would actually decrease even further in 2020 and 2021, with the 2021 ACL 63 percent lower than the current ACL.

For 2020 and 2021, based on current landings, the commercial ACL would be met in November and the fishery would close and the recreational fishery would come perilously close to closing, with about 90 percent of the ACLs projected to be landed.

The black sea bass stock assessment and proposed ACLs are based on current MRIP landings estimates, which are going to change this fall for many species based on a recalibration caused by a change in MRIP survey methods. These new MRIP estimates could have very significant impacts on the black sea bass and other fisheries.

As you know, the black sea bass fishery is extremely important commercially and recreationally. The fishery is too important to rush in extreme ACL reductions.

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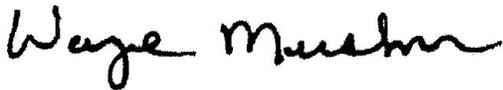
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We believe it is important for fishery stakeholders know the impacts of the new MRIP estimates on the black sea bass ACL prior to any adjustments. We also believe that most fishery stakeholders are unaware of the proposed ACL adjustments. A delay would allow stakeholders more time to become aware of the proposed adjustments and for scrutiny of the black sea bass stock assessment.

Again, we ask the SAFMC to delay any ACL adjustments for black sea bass until at least the recalibrated MRIP landings estimates for black sea bass are available.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Wayne Mershon". The signature is written in a cursive, flowing style.

Wayne Mershon
President