

**PUBLIC COMMENT SESSION
KEY WEST, FLORIDA
JUNE 15, 2022**

MR. SPOTSWOOD: Council members, welcome to Key West. Thank you for being here in Key West, and thank you for the important work that you do. My name is Robert Spotswood, and I was born and raised here in Key West, and I am a commissioner and past chairman of the Florida Fish and Wildlife Conservation Commission. I grew up on the water surrounding the Florida Keys and was heavily influenced by our natural resources.

In our home, back in the day, we ate conch, green turtle steak, and goliath grouper on a regular basis. One block away from our home, on Caroline Street, was the heart of the fishing industry, with hundreds of shrimp boats, turtle trawls, commercial fishermen, the Thompson Fish House and ice plant, and all that goes along with a healthy and thriving commercial and recreational fishery. Times have changed, and our communities have changed, and so has the health of our habitats and our fisheries.

Our resources are under more stress than ever, and our jobs at Fish and Wildlife and the federal councils are more important than ever, and I thank all of you for being up to the task for conserving and managing our resources in a thoughtful manner. The work of this council, and other fishery management agencies, depends, in large part, on the trust and confidence of our fishermen and our stakeholders.

Our stakeholders must trust us to not simply protect and preserve, but to conserve and manage resources, as trustees of those resources, for the benefit of the public, our fishermen, and future generations. This means we have to make tough decisions, sometimes restricting, limiting, and even closing fisheries, but, also, as we have found, it's even more difficult to give access back to fishermen and to open resources after being restricted or closed, when a fishery can sustainably be reopened. This brings me to dolphin and to Atlantic red snapper.

Over the last ten years or so, we have seen a significant decline in both numbers and size of fish in the dolphin fishery off the Florida Keys. FWC recently adopted management rules to reduce bag limits for dolphin from ten fish to five fish per person and to reduce vessel limits to thirty. This is mainly a federal fishery, and we urge this council to follow our lead and go consistent with our rule. In fact, I would urge you to go even further and adopt a rule similar to the rule we adopted for blackfin tuna sometime back, creating a bag limit of the greater of two fish per person or ten fish per vessel. Further, I would ask that you stop the practice of longlining for dolphin.

Atlantic red snapper, the most recent stock assessment for red snapper in the Atlantic says that red snapper continues to be the subject of overfishing. We must listen to our fishermen and stakeholders, use commonsense, and exercise sound judgment in developing management rules for this fishery that take into account the social and economic needs of the affected states. This fishery was largely closed in 2009, due to overfishing. The fishery was reopened again in 2011, on a limited basis, and we have seen ups and downs with this fishery over the years since.

In 2015, more fish were landed than anticipated, and this raised additional concerns. However, our fishermen have seen this fishery get more and more healthy, and we believe this fishery is

healthier than indicated by the last stock assessment. We also believe that the recreational catch of red snapper, and discard mortality, is highly overestimated.

In 2015, when I joined FWC, we had a three-day season for red snapper in the Gulf for recreational fishermen. Today, we have a recreational season of fifty-seven days. With the cooperation of the fishermen in the commercial, charter/for-hire, and private recreational sectors, and working with the Gulf states and our federal partners, we were able to increase our recreational season to fifty-seven days without taking any fish away from the commercial and charter/for-hire sectors, a win for all.

Cooperation with our stakeholders in the Gulf got a whole lot better, and the Gulf red snapper fishery is open and healthier than ever thought, and I believe we have the opportunity to go in this same direction with Atlantic red snapper.

As the council continues its controversial discussions regarding holistic snapper grouper management to offset estimated recreational discard mortality for red snapper, I urge the council and National Marine Fisheries Service's leadership to think outside the box. Any decision the council makes will significantly impact our Florida fishermen, our economy, and our local communities. Measures like area or time closures of all bottom fishing, not just for red snapper, but all bottom fishing in the snapper grouper complex, will not work for us here in the Florida.

The entire Keys' economy is derived, in significant part, from the water, in some manner, from tourism, commercial, recreational fishing, and related activities. Closing large areas could cripple local communities and our state's economy during already challenging times. This is not an option for Florida, moving forward, and we will continue to strongly oppose any such closures. I urge you all to keep thinking big picture and consider all the range of options besides deciding to take drastic and what we think to be unwarranted action to close areas for all snapper grouper species in order to offset red snapper discards, which we're not even sure of the extent of. Our commercial and recreational fisheries in Florida are too important for us to take such drastic measures based upon uncertain discard data.

Again, I thank you for being here in Key West, and I hope that you will give some consideration for the comments that I have made today, that I'm sure you will hear from others today and going forward, and I really thank you for the important work that you do. Thank you very much.

MR. SWEETMAN: Good afternoon, virtually, to Chairman Bell and Vice Chair Belcher and members of the South Atlantic Council. Thank you for the opportunity to provide comment today, at today's meeting. My name is C.J. Sweetman, and I am the Federal Fisheries Section Leader for the Florida Fish and Wildlife Conservation Commission, and I currently sit on the Gulf of Mexico Fishery Management Council. Today, I am providing comments on behalf of Eric Sutton, Executive Director of FWC.

FWC is entrusted with managing Florida's fish and wildlife resources for the benefit of the people. Not only do our fisheries resources contribute significantly to the state's and country's economy, but, as the fishing capital of the world, they also hold deep cultural value. Just take a walk around the waterfront here in Key West, and you can see how integrated the community is with the ocean and its fisheries resources. Florida is a leader in fisheries management, and a

large part of the reason we are effective is because we work closely with our stakeholders to provide reasonable access to our fisheries resources.

During yesterday's discussion about red snapper, it was concerning to hear some of the extreme options being considered for the entirety of the snapper grouper fishery. There are dozens of species in the snapper grouper fishery, many of which are healthy stocks, and a vast majority of these species are important fisheries in Florida waters. The concept of temporal or spatial closures for dozens of species to solve the problems of one would not only devastate Florida's economy, but it's also counter to FWC's mission to provide reasonable access.

As a result, FWC finds these time/area closure options as unacceptable for the State of Florida and its people. Public trust is an important part of being able to effectively manage natural resources. FWC understands that difficult decisions sometimes need to be made, that not everyone will agree with. However, these decisions should always be based on accurate and precise scientific data that comprehensively consider the biological, ecological, social, and economic effects. What I heard yesterday were discussions that would disproportionately impact Florida citizens, based on discard data that, and I will quote from the SSC presentation, that is largely unvalidated and may not be accurate for the snapper grouper complex.

It now seems like the council is considering compounding uncertainty with MRIP landings data even further with more uncertain discard data. This is a problem, and it would completely erode any remaining public trust that the council and NMFS has.

There is no denying that we need sustainable fisheries, but continued access is also of paramount importance. People are a part of the fishery, and the fishery is part of the people. Every day, we hear from fishermen stating that red snapper abundance is higher than they can remember. FWC urges you all to continue developing creative ways and borrow ideas from other councils and state agencies to address the red snapper issue in the Atlantic.

At FWC, we developed the Gulf Reef Fish Survey, now the State Reef Fish Survey, to take control and ownership of the Gulf red snapper fishery. I want to underscore that a spatial or temporal closure is not the answer, and complex problems need thoughtful solutions before taking drastic action. I appreciate the work you all do for our fisheries resources in the South Atlantic. As trustees of the resource, we all must do everything we can to help our commercial and recreational fishermen, while conserving our fisheries resources for future generations. Thank you for the opportunity to talk today.

MR. KELLY: Good afternoon, council members. Bill Kelly, and I'm here representing the commercial fishing industry in the Florida Keys today. I would like to comment on a recent initiative by the Florida Fish and Wildlife Commission to consider the implementation of casitas in the spiny lobster fishery, ostensibly to protect corals. Any action to do so will require multiagency approval, including both the Gulf and South Atlantic Councils.

In any fishery, whether commercial and recreational, there are both pros and cons to various harvesting methods, and such is the case when considering the use of casitas versus the traditional trap fishery for spiny lobster. User conflicts arising from the legal deployment of casitas by divers, disease arising from the PaV1 virus associated with casitas, and reduced harvest led to an FWC ban on their use in 2002.

Additional studies conducted by FWRI in 2009 and 2011 and presented to the commission resulted in a continuation of their ban from Florida's waters. Introducing casitas into the spiny lobster fishery is looked at unfavorably by stakeholders as an acceptable transition or replacement for traditional methods of the trap fishery. This is due, in large part, to the illegal and ongoing deployment of casitas over the years and egregious resource violations that took place during the period of 2006 to 2013.

During this timeframe, tens of thousands of illegal casitas, consisting of car hoods, PVC piping, metal sheeting, and other debris were deployed in waters of Monroe County and the marine sanctuary by opportunistic individuals. Convicted resource violator and lobster poacher, David Dreifort, is known to have deployed more than 1,500 casitas in a year-long operation of poaching that netted the arrest and successful prosecution of not only Dreifort, but several of the most prominent names in sportfishing that participated in this illegal activity.

When apprehended, Dreifort had over 6,000 lobster tails in freezers in his possession. Equally, or perhaps even more disturbing, is the associated illegal activity carried out by the Dreifort group during this period, and anecdotal evidence suggests that it is ongoing by others engaged in this type of activity. NOAA incident reports detail the illegal harvest of other marine species, including stone crabs and finfish. Apex predators that were documented by the NOAA investigation and known to aggregate around casitas are black and red grouper and the highly-endangered goliath groupers.

This same group of divers that were poaching lobsters from these casitas were also spearing groupers, including those goliath groupers, and selling the fillets to restaurants and fish houses of the Keys as legally-harvested fish.

Under part of the sentencing agreement with Dreifort, he was required to provide the GPS coordinates for all of his illegal casitas and pay for their removal, and the settlement funds were sufficient for the removal of approximately 500 of them. The marine debris recovered was enough to fill twenty twenty-cubic-yard dumpsters, but only represented about a third of the 1,500 casitas that he had deployed.

From a law enforcement standpoint and perspective, converting from a trap to a casita-based fishery will create an enforcement nightmare. Presently, there are only three NOAA Law Enforcement officers assigned to the Florida Keys National Marine Sanctuary, and approximately fifty-one FWC officers assigned to Monroe County are also charged with supplemental enforcement of the 3,100 square miles of the sanctuary.

However, the sanctuary's supplemental funding for those efforts has been cut by more half over the past six years. Once the locations and GPS coordinates of these casitas, deployed year-round, become well know, the potential for illegal harvesting on a continuing basis will be astronomical in scope.

In closing, harvest of spiny lobsters by trapping represents the most valuable commercial fishery in the State of Florida. Including turnover, the value of the commercial fishing industry is over \$900 million annually to Monroe County and constitutes the second-largest economic engine in

the Florida Keys, next to tourism, and the second-largest employer, with more than 4,500 jobs boat-related.

Converting this fishery from a trap-based method to casita-based will cause enormous socioeconomic impact to the industry and have the potential to collapse the economy of the Florida Keys and other small commercial fishing communities in Florida. We urge the council to forego any thought of transitioning to a casita and diver-based spiny lobster fishery in the State of Florida. Thank you.

MR. DEMARIA: I would like to address this goliath grouper issue and advise the council not to follow the lead of the FWC on this one. I know there's not a lot of data out there on goliath grouper, but I think there's enough to -- There's not enough data to show, one way or the other, whether they're going up or down, but I think there's enough data to throw up some red flags, and one red flag, to me, is the commercial snapper grouper discard logbooks.

Between the 2002 and 2018 years, there is something like 1,682 goliaths discarded, and that only really represents 10 percent of the effort on discard logbooks, and I think they're given out to 20 percent of the fleet, and I was told that only about half of them report, and so the actual number could be an order of magnitude higher, or ten-times higher, 16,820, and that's a lot of fish, and, if you look at the commercial shark fishery, the longline, their discard logbooks too, it's not real complete, and my understanding is it only represents about 2 percent of the effort, but it's fifty-two goliaths, and so, if you were to extrapolate that figure, that's 2,600 more, and a lot of the discards from the longline shark fishery came from that area off of Jupiter where the spawning aggregations are.

When the sandbar sharks were closed, some of these boats moved inshore and were setting right along where the aggregations are at, and I talked with Mike Newman about this, a commercial fisherman in that area, and asked him what he thought about it, and if these fish were being vented or what, and he just laughed and said, Don, they tell me they vent them with a twenty-two rifle as they're floating off behind the boat, and so I don't think too many of these fish are living.

The recreational data is not really complete, and it's hard to get -- It's hard to standardize and get a catch per unit effort on it, but, if you look at the MRIP data, it's a lot of fish, a lot of goliaths caught, and, if you go back to Amendment 2, and I've got it here, and it shows the recreational landings between 1979 and 1987 were roughly three to four-times higher than commercial, and so that's back when it was open, but, still, I think it's safe to say that the recreational discards are probably pretty high, maybe even higher than commercial.

If you were to assume a discard mortality for goliath of 33 percent, which is what you all figure for snapper and grouper across-the-board, that's a lot of dead fish, and Chris Koenig did some work off of southeast Florida, where he put transponders in some of these goliaths, and there were like fifty of them that had internal transponders, and the battery life is like eleven years, and these are really site-specific fish. They stay in some places year-round, and they come back to the same areas to spawn, and there's only one of those active today.

He also did dorsal fin clips on the hard dorsal fins, to get age, and you could do it instead of otoliths, instead of killing the fish, but it leaves a scar on the fish. They heal up, and the spines

don't grow back, and, if you dive those wrecks today, you really don't see those fish around. We saw some for a while, and they were just -- They were gone.

Another problem that I'm sure the FWC has heard about is this catch-and-release on spawning aggregations. I've got some photos that Walt Stearns took of these fish, and their eyes are bugged out, and some of them their eyes are rotted out of their head, and they're healed over, and it's a big mortality involved with that. If you look at some of the anecdotal reports from like Bill Parks and Walt Stearns, they've been keeping track of the fish over the years, and it's been a steady downward decline.

Angela Collins did some work at Bahia Honda, years ago, on August 2, 2011, and encountered, on one set of pilings, about fifty goliath grouper, at least that many. I would go out there, and they were always there, year-round. They weren't spawning, and I'm not sure what they were up to, but they were there, between thirty and 250 pounds, and, if you go out there today, and there's maybe five or six fish by these pilings, and that's it, and I've got pictures of three different goliaths that we saw with spears with them, and we see them speared out there all the time. I've got all that here that I will hand in.

There was kind of a big deal made with the IUCN changing the status of the goliath from critically endangered to vulnerable, and it's still on their red list, but that was more of a change in the way that the data is analyzed, rather than an actual change in the status, and Yvonne Sadovy wrote a letter to the FWC on that, and I've got that here, and she explains it completely.

The Everglades creel survey, that shows an increase in them in recent years, but they were beat down to almost nothing in 2009 and 2010 in the cold front. When the water gets below like fifty-five degrees, they just die, and it was an estimated 90 percent, close to 100 percent, mortality, and so anything up from that is going to be an increase.

The Reef data, the fish count, that shows a downward trend in them, and it's not what the FWC staff initially said, that it showed an upward trend and, as far as, you know, the FWC and whatnot is concerned, I have worked with this council quite a bit over the years, and I've been on advisory panels and working groups, and I see recreational fishermen and women and biologists and fisheries scientists, and, when I look at the seven-member panel at FWC, it's mainly developers. If you really want to manage a resource, you ask the users in the communities and the scientists. If you really want to screw up a resource, ask developers. They've had plenty of experience doing it, and they're professionals. Look what they did to Florida.

In closing, I would just say, you know, I think this council has got a lot more integrity than the FWC Commission, and just look at all the data, and don't run the equation backwards, like the FWC is trying to do. They know what the outcome is, and they're going back and just cherry-picking data and plugging it into an equation to get the answer that they want, and so just look at everything, and thank you for your time, and I want to hand this into the public record.

MS. GUYAS: Good afternoon, everyone. Martha Guyas here, with the American Sportfishing Association, and our association includes fishing tackle and equipment manufacturers, retailers, boat builders, and other members of the sportfishing trade. Just from North Carolina to Florida, recreational fishing, saltwater recreational fishing, supports nearly \$10 billion in economic output and nearly 78,000 jobs, and so the decisions the council makes not only impact

commercial and for-hire businesses, but the sportfishing industry throughout the country, as well as the coastal communities where recreational anglers fish.

Let's talk about the release mortality reduction discussion yesterday. We share your frustration with the very complex situation that the council finds itself in. I would say that yesterday's discussion was difficult, but the comments and questions that were raised are much appreciated, and it's hard to believe that we're back to discussing large-scale area closures and seasonal closures for all snapper grouper, using very fuzzy discard information that doesn't provide a lot of confidence for the red snapper fishery, that is at record abundance and has had several years of strong recruitment and continues to rebuild on schedule.

With that said, we support the council looking at how to work with fishermen to reduce discard mortality and subsequently figuring out how to account for changes in angler behavior and, in the long term, finding productive ways to better manage the entire snapper grouper fishery. Education, outreach, and, probably most importantly, building trust with and gaining buy-in from fishermen is essential to this process, but it's going to be extremely challenging, for the reasons that you discussed yesterday, especially when severe access restrictions are on the table, with no clear path for relief.

Looking forward, we've got to get better science, to have reliable information about discards, discard mortality, landings, basic biology, and the social and economic considerations for South Atlantic snapper grouper to better inform management. ASA has, and continues to advocate, for funding to support and improve these efforts, and we encourage the council, the agency, and the states to proactively work with stakeholders on getting better data to inform management and assessment of our fisheries.

Just on dolphin, real quick, I think there's probably a few people that are going to talk about that today. Given the requests for additional conservation that have come from the people that participate in the dolphin fishery, ASA supported the five-fish bag limit and the thirty-fish vessel limit implemented by FWC in Florida waters, and, although we supported Dolphin Wahoo Amendment 10, ASA encourages the council to explore additional updates to dolphin regulations, given the continued concerns that all have heard about the dolphin fishery, and, also, we're looking forward to the discussion about the dolphin MSE tomorrow morning, and so thanks for listening, and we look forward to continuing to work with you to tackle these complex issues.

MR. AUKEMAN: Good afternoon, council members. My name is Trip Aukeman, and I'm representing Coastal Conservation Association Florida. We would like to discuss dolphin and red snapper. One, with the dolphin issue, a lot of it has already been said, and thank you to Commissioner Spotswood, and we would like -- We thank the FWC for what they did, and we would like to see the council work on some other management issues with the dolphin. Bringing them down from sixty fish to fifty-six fish was nothing for the fishery, and we would like to see it condensed even more and get -- Possibly, if we can, get rid of the longline fishery on the dolphin fishery.

Then, representing -- That's kind of -- I would like to represent now CCA as a whole, with the red snapper fishery, and big, wide closures are going to be very hard for any recreational angler to accept. We really need to do something about the dead discards. I mean, we are trying to do

our part, with working with barotrauma and stuff like that throughout the states, and we would love to see some kind of state management done throughout the four states.

I worked with Jessica, and others, on the Gulf side, and, like Commissioner Spotswood did say earlier, we were able to take that fishery from a two or three-day fishery up to a fifty-seven-day fishery this year, and so I would love to see something like that happen, and I know some of my counterparts with CCA have been talking to some of the state representatives in Georgia, South Carolina, and North Carolina, but, anything that we can do to help, we would love to start that conversation, and so thank you.

MR. PEREZ: Hello, and thank you for taking the time to listen to me. My name is Tony Perez, as you stated, and I work for Eric's Outboard Marine Service. We are a Yamaha outboard dealer, and we have two locations, one in Miami and one in the Keys. We have over thirty employees, most of which have been there over fifteen years. I personally have been with the company for ten years now, and I'm also an avid boater and fishermen.

Our growing concern is with the changes and limitations to our recreational anglers and customers. We need the public to enjoy the water, their boats, and the resources. If more closures and limitations are added, this will result in a greater hardship for our industry, and less people will want to use their boats, in turn causing us, the industry, to lay off employees and give less back to our communities. Owning a boat is expensive. It's a luxury, and it's not a necessity. Our livelihood depends on the recreational population. In closing, we ask that the big picture not be overlooked. Thank you.

MR. WICKSTROM: I'm Blair Wickstrom, publisher of *Florida Sportsman Magazine*. I've been working for the magazine for thirty-seven years. My father started the magazine fifty-three years ago, and, for the most part, we've been the largest fishing communications company for the last half-century.

We have worked on behalf of a lot of angler efforts over the years, and I think there is just something that we have got to do a better job of keeping things simple, as we've just heard, so people can get out and enjoy their time on the water. If I could do anything, I would like to take Commissioner Spotswood and take what he just said and bottle it up and sort of use that in terms of two things.

One is to communicate that we have a similar rule regarding dolphinfish between the state and the federal waters. I appreciate all the work that you guys did with Amendment 10, and I'm sorry this couldn't have been done say four years ago, when you started working on Amendment 10, but, right now, we have a problem that started sort of in that timeframe of 2015 to 2020. Over that period of time, there is two-million fewer fish caught, about nine-million pounds, between 2015 and 2020. It's the exact opposite of a hockey stick. When you see numbers fall like that, you would think that the house is on fire, and we need to do something, and so that was in the process of during your work on Amendment 10.

What we need to try to do is -- Unfortunately, we've got to revisit it. The numbers continue to go down, and we continue to hear, anecdotally, that people aren't finding fish. They're not going to go to Eric's Outboard for service work, and they're not going to go to Eric's Outboard to buy

a motor, and they're not going to go there, period, if they can't go out and realistically catch a fish, and this is a \$10 billion industry in the State of Florida.

Our advertisers, our readers, they depend on it, and they're not going to continue to enjoy our great sport, our great state of Florida, if we don't do something with the number-one offshore species, and, in twelve to fifteen reader surveys, over the last twenty-five years, dolphinfish has been the number-one favorite sought-after offshore species, and so, on behalf of those readers, I would like to introduce into public record 7,000 people that have signed the petition to lower the bag limit to ten per person, lower the vessel limit to thirty, institute a 2,000-pound daily commercial longline limit, and a twenty-inch minimum across the entire zone.

If we need to go further, in reference to what the state could potentially enter, I think our readers, our people, would be gladly -- They would gladly follow that. They have shown -- Like, on the west coast of Florida right now, because of red tide and terrible, you know, sort of regulations regarding our water, they can't keep a fish, and they can't catch a fish, and, if they feel like this is what we have to do, they're okay with a temporary closure, and so I think they will do -- Our readers, the people of Florida, for the most part, are going to be okay, if they have confidence in the science behind this.

I would also like to introduce, into the record, a sign-on letter with twenty-six organizations and leading recreational industry leaders that have also signed the letter asking for a similar restrictions to the dolphin fishery. It's a very important fishery for just the kind of guy we need, and it's the kind of fish that you can go out, the day you bought a boat, and realistically catch.

If you end up, from Ohio, fishing with a friend, and he goes out and catches a fifteen-pound dolphin, the chances of him buying a boat and buying a license and going fishing again is far more likely than if he never did get a chance to see a fish caught. The dolphinfish is that fish, and it's the one that gets people excited. It's the one that transcends generations of anglers, and so, again, I apologize that we're asking you to revisit what you just spent three years working on, but, as Trip said, the change from sixty to fifty-four just -- It really is not going to do enough for that resource, and so thank you very much.

MR. GATES: Thank you for allowing me to speak. My name is Don Gates, and I have fished the Florida Keys for over forty years. I'm a recreational angler. In 2002, I could see the population and the change in the dolphin fishery, and so I know you can't change anything without data, and so, in 2002, I joined the dolphin tagging program and started tagging dolphin.

Here in the Keys, I have personally tagged dolphin every year over the last twenty years in this program, and I have tagged over 4,300 dolphin. That's a lot of dolphin, and I passed the 4,000 mark in 2018, and so, in 2018 to now, less than four years, I have tagged another 1,200. In that amount of time, we have not caught a single dolphin over twenty pounds, and I cover a lot of area, and we have a written statement, written comment, that's been put in.

I have a vessel tracker on my boat. The last five years, I have logged every single mile, minute, fish that I've tagged, fish that I have kept, for five years, and all the data is there. If you look at it, the data clearly shows the fishing effort has gone up drastically, while my catch has dropped rapidly. We do not keep any dolphin under twenty-four inches. There is no need to. Everything

under twenty-four inches gets tagged on my boat, and we have -- I couldn't even tell you the last time we've kept more than six dolphin in one day. It's just not necessary.

I think that, when you start talking about changing limits on people, it gets very emotional, and people get quite upset. I think that you have to look at the data. The data from our dolphin research program clearly shows it's one population of dolphin that travel up the Atlantic, and it should all be under the same regulations and the same limits. It's the same dolphin. The dolphin that I tag here are recaptured off of New England. Anywhere from seven to thirty days, they're there, and it's the same population, and we should have the same regulations all across the coast, and I would clearly support a twenty-four-inch limit and a reduction in the per-person catch. It only makes sense.

If we don't do something -- I would not be a recreational angler if it weren't for dolphin. There's a lot of people that way. If the dolphin dries up here in the Keys, people aren't going to be coming here and spending the money to go out to catch them. It's the prime fish that we look for here in Florida. Thank you for your time.

MR. WAMER: Good afternoon, council members. I'm David Wamer. Even though I'm from South Carolina, I have been fishing -- I am a native Floridian, and I have been fishing in the Florida Keys for about twenty-five years, primarily for dolphin, and other species too, and I followed the development of Amendment 10 very closely, and, as that amendment took place over the last, as it's been alluded to, three to four years, major factors in the difficulty associated with defining appropriate regulatory measures for dolphin were the lack of quantifiable data of the status of the stock and identification and understanding of the environmental and fishery drivers that show the general abundance of the stock. Unless progress is made in that area, Regulatory Amendment 3 could be much the same process.

There seems to be rather broad agreement that there has been a decline in the size and number of fish, and we've heard that already this afternoon, and we heard it in the advisory panel meeting several weeks ago. However, even though factors such as climate change, the impact of the international harvest, as well as commercial bycatch mortality, are frequently mentioned as drivers of the status of the stock, improving knowledge in those areas has continued to not be made a priority objective within this council, and, in particular, the Dolphin Wahoo Committee.

During discussions on the composition of Amendment 10, there was regular reference to not adopting stronger management actions, due to not knowing the answers to these questions. This is likely to continue, as I said, with Regulatory Amendment 3, and future amendments, unless a determined effort is made to initiate and cultivate knowledge in these areas.

A few council members have mentioned the need to move forward in this area. However, to this point in time, a strong leadership position, that's needed, has not been taken by the council. Even though the precautionary aspect of the Dolphin Wahoo FMP has a key role in the current management actions, being able to move forward to a more fact-based management approach, and defining these factors, has not been made. The process of developing answers to many of the open questions about the dolphin stock will require the participation of a broad array of groups and organizations. This is a complex issue, as all of you can appreciate.

The council needs to take a major leadership role in that process. Dolphin fishing is centered in the United States. It's an international issue, but, unless the United States takes that leadership position, it's going to be difficult for progress to be made. The council's role should be one of identifying, sponsoring, and participating directly, as appropriate, in individual initiatives that contribute to making the needed progress.

There is examples of this, and you have one on the agenda tomorrow, and I'm very encouraged to see that. The Dolphin Wahoo FMP was formulated to address the scenario described above. Although the current stock has not reached a level that requires dramatic management measures, such as severe limitations on catch limits, or even closures, that we've seen with other high-profile species, and, as you know, red snapper, and I will mention that, and there is danger that, if stronger, near-term management measures and a better understanding of the factors impacting the fishery are not developed in a timely manner, dolphin is going to move down the same path.

With the stock ranging across the Gulf of Mexico and the Caribbean, as well as the U.S. Atlantic coast, for optimum management to occur, that management needs to be expanded to cover that entire area. To do so will require a joint effort that includes the Gulf and Caribbean Councils, as well as those three that are currently involved.

To prevent further dolphin fishery decline, it is incumbent upon the council to provide the leadership that I mentioned and engage NOAA Fisheries to strengthen federal protection. As I mentioned, an encouraging step is being taken with the NOAA/North Carolina State University management strategy group being on the agenda tomorrow and strong follow-through in this direction in the future will have the council on the right path for managing the dolphin fishery. Thank you very much.

MR. NOLTE: Hi, folks. My name is Wayne Nolte, and my credentials are about the same as Robert Spotswood's, except maybe twenty years more. I hate to say that, but they don't -- I am here about the goliath grouper. I can't imagine the decline in goliath grouper in my lifetime. Actually, they were almost extinct around 1990, and we closed the season, and we went to great lengths to empanel experts to study this and find out what was going on and everything else, and now here we are again, after all that we've been through with these experts and what they've recommended, and we're going to think about opening a season on them, and they're actually in decline.

Anybody that would think something like that has definitely not read the thirty-year findings and the thirty-year report that these people made, and they went to great lengths, and, by the way, we paid for that report in our tax dollars, and they have recommended -- I will hit the three high points, because the report is twelve pages long, and it tells you everything you need to know about what is happening, where they got the information, how it all transpired, the whole thing, but the last page, the summary, and the conclusions, is what you need to really concentrate on.

They have said that they're poison, and they're full of mercury. They have one of the highest levels of mercury in any fish, and they have taken a lot of samples. The report shows where they got the samples from, and so why would we want to open a season that the fish aren't good to eat? Secondly, they have lost most of their habitat for the juveniles that are born. They're gone.

We had a modest rise in population in 2010. After 2010, we had some catastrophic events, cold snaps, red tides, one thing or another, and now they're back in decline, and they have been in decline ever since then, and they are getting fewer and fewer, and they have not turned around, and they can't figure the mystery out, and that's in the conclusion in the report, and they recommend that no season at all be opened and that they be put in the same category as turtles.

Then it goes on into the diving and the money that's been instigated, and it's all in the report. The money that they have -- Through tourism, to come see these things, is in the millions and millions, and it's all in that report, if you would just read it. Just read it and don't form an opinion.

That's all I'm asking, is that we read the report, and I have made printouts, and I have handed you people just the last two pages, because that's what the conclusions are, and the recommendations, and I figured that I can't tell you the whole report, because we're under a time restraint, but you read that report, and you will say, Jesus, we must be out of our minds, and so that's about all I can say on it.

Please read the report before you start opening seasons. They're not everywhere, like people are led to believe, and that's old coffee-shop fishermen, and it's not happening. They are declining, and these people are experts. They are the most educated people, probably, in Florida on this type of stuff, and they worked for thirty years on this, and they have said they're a diamond-in-the-rough for tourism. Use them as that, instead of opening the season, because why would you open a season on something that's poison? It's insanity. Thank you.

MR. STRELCHECK: I have a question, or not a question, but just to address what was stated by the previous speaker, and there is not a decision, or a discussion, before this council to open goliath grouper. The State of Florida has authority to manage within three or nine miles of shore, and they have made a decision to open a limited harvest for goliath grouper.

This federal council before you today has authority to manage federal waters, which, in the Gulf of Mexico, is nine miles out to 200 miles, and we, at this point, are not contemplating an opening of goliath grouper. We do the assessment, and we conduct a lot of the research, and we set the catch levels for goliath grouper, but I just wanted to make it clear, for anyone that may be testifying today, that we are not contemplating an opening of goliath grouper with this management body. Thanks.

MR. BUCKHEIM: Hello. My name is John Buckheim, and I'm a commercial fisherman, foremost, and I'm also the owner of a fish house, and I'm a recreational angler, and I consider myself fairly well-rounded in the whole Florida Keys ecosystem and fishery. I would like to speak on several different topics today, the first being closed zones. I am not in support of any further closed zones, and it just puts more pressure elsewhere, and I don't believe it's the answer. I think increasing size limits and other routes are much more beneficial.

The first main topic that I would like to talk about is amberjack. I know they're talking about changing some size limits and seasons and a few things there, and I am in support of getting rid of the April season, closed season, and I am against reducing any size limit. I would like to see the recreational size limit match the commercial size limit, at thirty-six inches. I think that's a better fish for everyone. If you catch it on a charter, it's an actual big fish, and it puts up a real

fight. If you're a commercial fisherman, it actually weighs something, which is what matters. That's pretty simple on the amberjack, but I do not think we should have multiple size limits. It makes things confusing. Just make it thirty-six for everybody everywhere, and it's consistent with the Gulf, and it just makes sense.

Secondly, snowy grouper, and I agree that snowy grouper are overfished. As a commercial fisherman, you don't often hear us say that. The reason though, and I hate to point at any one group, and I take partial responsibility for the decline in snowy grouper myself, but the main thing is the recreational electric reel. There is a massive -- Every boat now has an electric reel. When I was a kid, no one had electric reels, besides a few commercial fishermen. Now, every boat -- Everyone does it. They want it for the Instagram picture, and it's not recreational fishing. It's pushing a button, and so something needs to happen there. That's where your snowy groupers are going, the majority of them.

You have recreational people that are allowed to keep one snowy grouper, and are dropping nine-hook gear. Why? That does not make any sense to me. I don't think you're going to be able to get rid of the electric reel, but I think we can limit the number of hooks. I would like to see it limited to one per rod. There's no reason to have multiple-hook gear for recreational fishing, except for sabiki rigs for catching bait. Three would be an option, but getting it down to one, consistent with the amount of fish that you're allowed to keep, only makes sense.

Thirdly, I would like to speak on artificial reefs. Bill Kelly came up and spoke on artificial reefs and denounced them. Well, he represents the Monroe County Commercial Fishermen's Association, which is not truly the Monroe County commercial fishermen's association. It's the Monroe County lobster trapper's association, and that is the -- What it should be called. I understand that it's not how they catch lobster, and why would they want anyone else to do it any other way. The artificial reefs are a very viable way to catch lobster, and they would take pressure off of a lot of other things. It is complicated, how to manage them, but it is a viable way, and it should not be thrown out.

I think that's pretty much all I have to say, and I would like to reiterate all those things, just that the closed zones do not do what we need, and we need size limit increases, and just the whole recreational electric reel thing is a huge problem, and it hasn't been spoke about by anybody. With the advances in CMOR mapping, and all these different bottom-mapping things, and everybody has got a quad-engine boat that can run a hundred miles, and these deepwater fish are getting pounded, and so I think that's a pretty good step in the right direction, would be limiting the amount of gear. Thank you.

MR. TROSSET: My name is Captain Robert Trosset, and I've been a Florida Keys guide for forty-eight years. I have seen all of this at its heyday, and I've seen it as it has declined, and I have seen a lot of the comebacks. The one thing that I am totally against is any area closures in the Atlantic. I think the size limit would be the way to do it. We have done it with the mutton snappers, and, actually, the commercial guys, the charter boat guys, have self-imposed limits. Even during the spawn, we would have a self-imposed limit.

Even back in the 1980s, I had a self-imposed limit of cobia on the boat, because there's just no reason to go home with nine giant cobia, and so I see the need for this management, and I agree

with the Florida game and wildlife, their limits, and I like that thing, and I think we need really to look at that.

Then the other thing is the dolphin is -- They are hurting right now, and so those limits really need to be looked at. Taking away the bottom fishing, that's probably 30 percent of what most of the Florida Keys guys do. A lot of it is in state waters, but the federal waters also, and we need to do that, and so, anyway, that's all I've got to say. Thank you.

MR. BENSON: Good afternoon. I'm Captain Will Benson, and I'm the sitting flats member of the Florida Keys National Marine Sanctuary Advisory Council, and I'm also a board member of the Lower Keys Guides Association. I would like to thank all of you guys for coming down here and taking the time to visit the Florida Keys, our city, the city that I was born in, that I have been raised in, and, like many who you have heard from today, spend our time on the water.

It is the position of our guides association, and we share the same basically vision that Commissioner Spotswood articulated. We look at the need for everything that you've heard from the experienced individuals with regard to dolphin, and we completely agree with them on that. I think we should look broader, to the international wider Caribbean Basin, and I ask all of you guys to, you know, take this up to leadership and take this further up the agency and ask to convene a larger council and to bring other nations to the table, as we consider how to, you know, bring that stock back. There is more that we can do, and it occurs upstream of us, down in the lower Caribbean Basin.

With regard to the potential vote that you guys are considering with the spatial closure for red snapper, it's my understanding that the science could be better, and I think that what you're considering is possibly doing a very dramatic, you know, rule change here in the Florida Keys, and the Florida Keys is a very dynamic, fluid resource that really has a lot of multifaceted components to it, and I just don't know if we have the science necessary to support those kind of closures at this time, and so I would ask you guys to kind of hit pause and to think about what science we can do to achieve, you know, true adaptive management, as we consider the unique needs for this location down here in the Florida Keys.

I also would ask you guys to consider what we're experiencing at the Florida Keys National Marine Sanctuary, with the rulemaking that's ongoing right now, and we have seen, firsthand, what happens when there is mistrust of the science and when there is mistrust of the agency. It's something that we're facing, and are trying to do a better job of handling that, and I think, when we start talking about large closures and shutting down the snapper fishery here in the Florida Keys, which, you know, seven-million recreational charters were run in Monroe County last year.

If we take that and close down that amount of area, we're going to put an enormous pressure on the Florida Keys National Marine Sanctuary and the State of Florida and the Gulf. That's a huge issue, and that pressure has got to go somewhere, and I just don't think we have the science to support it, and, as you guys consider motions at this point in time, look for stakeholder buy-in. You have heard, today, from very prominent folks who have a huge amount of wealth of information, and many of them I know personally, and I think we can do a better job, and we can do more, of bringing in local folks here and looking at this specific issue to the Florida Keys.

It might be a little bit different than the rest of the South Atlantic, and, you know, maybe it's time to take a look at that as well, but I know, for our constituency down here, from the folks that you've heard from today, this kind of closure is just not going to work at this time, and I think it jeopardizes some of the important work that we're doing at the National Marine Sanctuary. Thank you very much for your time, and thank you for coming to Key West.

MR. MERTEN: Good afternoon, council. Thank you very much for providing me the opportunity to comment. I would just like to submit a statement for the administrative record as it pertains to the Regulatory Amendment 3 and strengthening the U.S. Atlantic Dolphin Wahoo Fishery Management Plan.

My name is Wessley Merten, and I'm a professional fisheries scientist, and I run the Beyond our Shores Foundation, which is a 501(c)(3) non-profit organization based in Newport, Rhode Island, but our research expands throughout the Western Central Atlantic Ocean and eastern tropical Pacific Ocean. Our fisheries research portfolio includes several themes, but all are focused on data collection associated with dolphinfish, in some shape or form, and, in fact, I personally have been studying dolphinfish for the last thirteen years, but I now manage an international capture-mark-recapture program for the past five years for dolphinfish, known as the Dolphinfish Research Program.

This tagging program was previously run by Don Hammond, and the data collection associated with his effort dates back to 2002. Mr. Hammond, in conjunction with our program, gave several talks to the council in the past, and I'm continuing and building upon his work. Over the past twenty-one years of research, and the last three-and-a-half years of staying engaged in the council's Amendment 10, and now Amendment 3, process for the Dolphin Wahoo FMP, we have submitted several analyses and official public comments, and we submitted our fourth today to the council.

My statement for today is really to direct the council to examine our written statement submitted this morning. For the last five years, we've collected vessel tracking, dolphinfish tagging, and dolphinfish landings data for every outing for a private recreational fishing vessel active off the Lower Keys in Florida and provide quantitative evidence of an increasing fishing effort for this vessel, and a decreasing catch, off the Lower Keys.

In total, we collected detailed records, with this vessel, for ninety-one outings over the last five years. There are several data metrics that I urge the council to examine in our written statement, but I will only mention a few here today. First, to piggyback on John's comment, not one outing produced a landed dolphin larger than twenty pounds in the last five years. He only had one encounter of a fish in that size class, and the largest landed dolphin was a twelve-pound bull.

Catch and effort were examined in detail for June and August, when the vessel was most active. For June, area fished increased more than twofold, from 327 square miles in 2017 to an average of 808 square miles in the latter part of the monitoring period, and annual June fishing time increased from forty-five hours in June of 2017 to a maximum of eighty-two hours in 2020, yet the number of landed dolphin, and so greater than twenty-four inches, which are called the keepers, and tagged-and-released dolphinfish has declined from thirty-five keepers in 2017 to ten keepers in 2021 and 394 tagged fish in 2017 to 166 tagged fish in 2021.

This analysis was put together because, to the best of my knowledge, all public comments, to this point, from Florida anglers, have been qualitative in nature. While qualitative observations are meaningful, the aforementioned analysis provides numerical observations and outcomes which support the majority of qualitative comments received from Florida anglers, but does it through examination and changes associated with the private recreational vessel's offshore fishing activity.

These results are meant to provide evidence to be considered during the Regulatory Amendment 3 process, as well as document a new technique to collect data with private recreational anglers, which the council could incorporate into their citizen science program to gather quantitative examples of changes in dolphinfish fishing activity.

Lastly, it's important to note the trends captured through this analysis do not support the qualitative trends reported for most anglers active off of North Carolina. This discrepancy merits the expansion of this, or similar, data collection program in those waters, and so thank you very much for the opportunity to comment, and we will stay tuned and engaged with the council as it pertains to the conservation and management of dolphin into the future.

MR. JOYNER: Good afternoon. My name is Woody Joyner, and I'm the newly-elected president of the North Carolina Watermen United, and I'm addressing you this afternoon from sunny Hatteras Village. Many thanks to the members of the council for extending the invitation for me to speak on behalf of our board of directors to voice our opposition to decrease the dolphin limit presented in the April 2022 meeting of the South Atlantic FMC AP.

The board unanimously requests the council to defeat this motion to drop the daily catch limit from nine person and fifty-four per vessel to the proposed ten and thirty. The council adopted Amendment 10 during your June 2021 meeting, which I was able to attend by webinar, to begin May 1 of 2022, and I don't understand the motion to decrease these regulations weeks before the actual enactment date of the amendment.

I attended your April 18 meeting, again via webinar, and did not hear any new science or population studies to reinforce the need to alter Amendment 10. The only arguments that seemed to come were the charter boat operators in North Carolina are currently overfishing the dolphin species, but, according to the numbers presented, with my math, I saw that we account for only really less than 5 percent of the total catch.

Now, I can assure you that our members understand and comply with all industry standards for reporting, conservation, and sustainability. The time to consider such a decrease should happen only after the current amendment has been in effect for an accepted period of time and a new population survey is conducted and that data analyzed. Then, and only then, can the council make an informed decision.

Now, our organization represents the needs of our coastal communities, and we fight for the rights of our commercial watermen, the charter/headboat operators, and all recreational fishermen. The NCWU firmly believes the council will act in a fair and equitable manner to maintain all guidelines currently mandated in Amendment 10. Now, from all the hardworking men and women and supporting industries of North Carolina, thanks for the time and the

consideration today, and, of course, our appreciation to the members of the council for your diligence and your commitment. Thank you very much.

MS. HARRISON: I am Alana, and I live in Hatteras, North Carolina, where I have a seafood market, and my father was a snapper grouper fisherman, before passing the business onto my brother, and I would like to give you all my perspective on a few things. I've been in this snowy rebuilding plan since I was twelve years old. I was the first in my family to graduate college, and I came back to run the seafood market, because I was under the impression that my brother and I would eventually be able to make a living off of snapper grouper.

Now, my brother is considering different careers, because he can't make a living, despite getting the business for free and having no dependents. I am starting to feel like I made the wrong decision, too. My dad supported a family of five with a stay-at-home mom well into the early 2000s, when he almost lost our house because of the deepwater closure, but it's not like you all want to be reminded of that, and so now here we are in 2022, and quotas continue to get slashed, fuel continues to rise, and commercial fishermen continue to sink, all because this council refuses to control their recreational anglers.

If I wait twenty more years, what assurances can you all give me today that it will be worth it? My family has made so many sacrifices for sustainability, and I wish we never trusted you all to hold up your side of the bargain, and, yes, I know that recreational anglers are only acting within the rules that this council decided, but the council could have changed fate by simply voting to limit their participation when they limited ours. Why could we not all be in this together? Why did they get on the lifeboats, and we get locked inside the sinking ship?

It's time to change the rules. You have to limit recreational harvest and save the fish. Why is it always about economic impact? Outboard sales are higher than ever, and you all may not monitor recreational effort, but marine manufacturers do, and, according to their association, outboard retail sales rose for the ninth consecutive year in 2020, to a total of 330,000 units. This is the highest annual sales volume in twenty years, and up 18 percent compared to 2019. It cannot continue at this rate, if you all truly want these deepwater species to rebound.

The draft amendment states there are 163 boats targeting snowy grouper commercially in 2019, versus 2,200 charter vessels and an unknown number of private anglers. I am in favor of higher trip limits. We do all-day trips here, and our inshore fisheries have been picked over by the sporties, and I'm in favor of a mahi size limit, a reduction in that bag limit for recreational, and against allowing bag limit sales. I am in favor of a reduction in blueline tilefish recreational bag limit and season length, because, off of Hatteras, we catch those alongside snowy groupers, and so the seasons should match, if you all's goal is to really rebuild snowies. I appreciate you listening in.

MR. CARSWELL: Guys, I'm coming today, and I just found out about this this morning, and so I'm not very well prepared, as far as having stats or data or anything like that in front of me, but I live here in Georgia, and I'm about two-and-a-half hours from the coast, and I've been fishing the Georgia coast since 1978, inshore and offshore, up until now, and so that's forty-four years, and I am here to talk about the red snapper fishery.

If I remember correctly, I believe it was in 1990 that a two-fish, twenty-inch limit was imposed. At that time, to be honest, me and my dad didn't pay a lot of attention to it, because we were in a smaller boat, a twenty-foot boat, and we only fished out to about twenty-five miles, and we didn't catch red snapper at the G-reef or the C-reef or J-reef, and it was rarely that you caught one, and so, okay, there's a limit or whatever, but we weren't catching them anyway.

Low and behold, it did wonders. Each year, it got better and better, and I actually told people, throughout the years, what a great job the feds have done with red snapper, and it's unbelievable. It's gotten better and better and better and better, and I don't remember a year that it's gone backwards, but yet we get two days this year. You know, I fish -- I want to say this. Listen. Fishermen, as much as anybody, at least the vast majority, we're not wanting to ruin a resource. We want to look after the resource, but there has become a huge disconnect in your policy and the days that we get to fish.

If you had to draw a line from your data, and your policy, to the two days of fishing, you can't do it. It's not there, and the reason I say that is because I could take you tomorrow, and we could catch 100 red snapper, 200, 300, whatever you want to catch, and that's what we can catch, and, now, I'm not going to do that, because we would have mortality and things of that nature, but we could. The fishery is in better shape than I have ever, ever seen.

Now, Georgia may be a little different than the State of Florida, and we don't have the pressure, and maybe you guys should look at saying, hey, Georgia, South Carolina, and North Carolina might be a little different than fishing offshore in Daytona Beach or New Smyrna or those areas there. They've got a lot more pressure, but the fishing is fantastic.

I have fishermen who fish in the Gulf who, every year, want to come fishing with me, on whatever day that we get, and they tell me, every year, that this is unbelievable, and we never knew your fishery was this good, and it is better than the Gulf of Mexico, and those guys get fifty-seven days, and we get two, and I realize they're managed in different ways, but it doesn't make sense, and they talk about confidence, and I've heard that said two or three times today, that there has to be confidence between the fishermen and the folks making the policy, and I can speak for the fishermen on the Georgia coast, as far as red snapper, and I'm not talking about anything else, but there is no confidence.

The confidence is zero. I called people today, to try to get them to come to this, and they said there is no use, and they don't listen, and we've tried this before, and it didn't do any good, and so, again, something has to be done, and I'm not looking to get six months of fishing, but, gosh, maybe five days, or maybe we could get two weeks, and see how it stacks up.

What I would also propose to you, and I don't know, and I could be dead wrong, but the actual people -- I've got to do my homework before I come on and speak again, and so I apologize for being off-base, if I am on something, but the committee who actually makes the rules -- I just wonder how many of them actually stepped on a boat and went red snapper fishing this year. Maybe a lot of you did, and I don't know, and I could be dead wrong, but, if you were to go, you would understand what we're saying, and you would see how well it's doing.

You've done a good job of rebuilding it, and thank you, but it's just gotten more -- You know, less days and less days, when the fishery is doing better and better, which does not make sense to

me, guys, and I'm just asking that we could reconsider for next year, and I know it's too late for this year, but reconsider that we come up with a different way to do this, or something different needs to be done, guys, and that's all I'm saying, and I appreciate your time today. I appreciate the work that you do, but let's try to bring what you guys are doing and what we see in reality a little closer together, because, right now, it is miles apart. Thank you so much.

MR. DRURY: I'm a resident of the coast of Georgia. To give a little background on myself, my father was a professional charter boat captain and commercial shrimp boat owner and a commercial crabber. I've got a little over five decades of experience fishing off the coast of Georgia and northeast Florida, and I have experience roughly from Hatteras to Key West and as far west as Galveston, Texas.

I would echo Mr. Carswell's statement on our red snapper population, and I would best describe our snapper population as being infested. The last trip that I made grouper fishing, I had a couple of drops on our snapper banks, where I target scamp grouper, or I used to in the past, and, the last trip I made, I had to weed through forty-eight fully-mature red snapper, caught and released, to get one grouper, and I'm kind of fearful that the reciprocity from us having so many red snappers is that they are impacting our offshore reefs here. I mean, you have to admit that a ten to thirty-pound red snapper is an apex reef predator.

I think our vermilion snapper and triggerfish, and even the black sea bass, populations are suffering, because we've just got way too many red snapper here, and I believe these fish are just literally eating everything. I even had a twenty-plus-pound kingfish by my boat last year that got torn apart by a pack of red snapper, on the surface, in a hundred feet of water, and they're supposed to be a bottom fish. If you go out and chum fish for mangrove snapper or whatever, you wind up with a huge pack of red snappers behind your boat.

We've got way too many reds here, and I believe that trying to manage these stocks as one big, monolithic stock on the southeast coast is a mistake, because, also, like Mr. Carswell said, we have nowhere near the pressure that they have from like Daytona south, or even up toward Hatteras. The pressure on their fishery is a lot greater than it is here, and, I mean, I've had days where I've gone out and never seen more than two or three boats, and that's near impossible in those other areas, and you'll see a fleet of boats out there with it.

That's primarily the comments that I wanted to make, was we need to have a little bit closer assessment of our red snapper populations here, and the one other thing that I would throw in, as far as the dolphin fishery goes, is remember that, for us to get to the dolphin fishery off of our coast, which the season only runs from like the end of March to about the first of June, and we have approximately an eighty-mile run to get to it, which means the days that we can go are going to be limited by weather, if nothing else, but the one assessment that I would give, from our season this past spring, is it was outstanding.

The last trip that I made, we actually quit early, and we had twenty-two dolphin in the box, and one good wahoo, two blackfin tunas, and I would say the average weight on our dolphin was about twenty-three pounds, and we had a couple of fish that would push up into the thirties, and so that's all I've got to say, and thank you for your time.

MS. SCOTT: My name is Haley Scott, and I run a small company called Fish Witch Media, and I'm a social media marketer who has a husband who is a mate on one of the area's longest-running headboats, and I'm not really well-versed in the science behind it, and I do work with over thirty captains in the area, the vast majority of which have been captains for a very long time, and we're talking a fifteen to thirty-year range.

We started this campaign two years ago, because, when I moved here, and my fiancé got a job on a boat, I could just tell that the industry was dying. The advertising mechanisms were outdated, and so I tried to involve myself and create this social media movement, to try to bring more people in, because the fishing tourism industry in our area is dying. After I started this company, I started realizing that, yes, the advertising mechanisms are outdated, but the real issue is the regulations, and that's what is killing the businesses here.

Now, originally, the charter fleet, which was a huge area business, and ran for over fifty years, it was comprised of three different boats, and they had two headboats, and they had a sport fisher, and business was good, and there was the grouper closure, which forced them to sell their second headboat and their sport fisher, and so that was, you know, a huge damper on the area. Luckily, we had another headboat willing to come in, and we have spent the last fifteen years, and this is previous to the snapper closure, trying to increase the tourism, but it's just -- It's failing.

People don't want to visit an area where they're not allowed to catch fish. Now, since the snapper closure, our captains have had to literally change their entire methods of fishing, because the snapper concentration here is ridiculous, and it's killing our reef system, and we don't see black sea bass anymore, and we don't see decent-sized vermilion anymore. Our triggerfish numbers are way, way down.

Now, meanwhile, these are people that are working, and, now, some of my captains are commercial as well, and they do both sides of it, and there is no reason for it here, and I think that, you know, for you to take the entire -- From North Carolina all the way to the Keys and judge that as a whole is ridiculous. Here, we have such a -- There is no closures on fish that actually meet it, and like we don't -- You can follow our group, and it's Ponce Inlet Fishing Charter Network, and you can see what the daily hauls are. You can see every fish.

I have seen, this year, maybe two sea bass, and there are no decent redeyes on any of our rocks, and there are no decent-sized triggerfish anywhere, and all we catch, all day, is red snapper, and we can't keep it, and our clients don't want to come here anymore, because they can go to another place where they're actually allowed to keep it. You have put the charter fleet out of business. The regulations have put a fifty-year-old business out of the area, and, over the last three years, I have watched so many more companies face closures, especially now that you're continuing it.

It's been eight years, and people have -- There is already an incline in all the fish that we're seeing, but, yet, you keep dropping our dates, and then you award the Gulf with more, and it's unfair, and you're killing businesses, and our inlet is going to die if something isn't done about it, and that's all I really have to say, and thank you for your time.

(Whereupon, the public comment session was adjourned.)

Public Comments
Wed, 6/15/22

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