

**PUBLIC COMMENT SESSION
CHARLESTON, SOUTH CAROLINA
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MR. JOHNSON: Thank you. My name is Robert Johnson. For those of you who don't know me, I've got a little bit of history here in this process, nine years on the AP, three years as chairman, and I also worked in the SEDAR process quite a bit, and I've done I don't know how many different species, including a couple of times on red snapper. I own and operate, my wife and I do, Jodie Lynn Charters in St. Augustine, Florida. We employ six men full-time, including my son, and we are a family-owned business for thirty years.

I am here because the actions of this group has the potential to put my family out of business. I have been fishing for over forty years in St. Augustine, and I started in 1980, over 5,000 days. If anyone here is a Malcolm Gladwell fan, in the book *The Outliers*, he would consider me an expert.

In the past, I've heard council members, in 2010, when I got involved, say, I'm sorry, Rob, but we're in a box. I can't stand that statement. We fishermen know what a box feels like. When we start seeing regulations being proposed and talked about and kicked around that we know have the potential to put us out of business, that's not a good feeling, and it's frightening.

My main concern is, when I was reading through Amendment 35, there was a statement in there that was provided by the SSC that said the bulk of recreational discards are off the east coast of Florida, and a spatial closure will be most effective in this area. That was the solution kicked around in Amendment 17A in 2010, the reason I got involved in the process. Here we are, and, what is it, 2022, and we're talking about the same thing. Really? We did it back then because there weren't enough red snapper, and that's why it was being proposed, and now we're going to do it because there is too many.

Just let that sink in, if you're a fisherman. We've done everything by the rules. We have done everything that was asked for us. We had zero harvest in 2010, 2011, 2015, and 2016, and limited harvest in 2012, 2013, 2014, and 2017 to present. Myself, I will pick zero harvest, any day of the week before you put me out of business.

It's sad to say that fishermen in northeast Florida refer to red snapper as red trash. You hear the on the radio say, well, I tried so-and-so, but I had to move, and the red trash was too bad. Let that sink in. You guys should be patting yourselves on the back about the success you've had with this stock of fish, but we're not doing. For some reason, we're trying to manage these fish using age-based models that I don't think works for this stock of fish, and we need to look at the productivity of the stock. We know that they're highly productive. The science shows that.

If you look at a production model, it goes straight up, because that's what the biomass has done. Is it really that daggone important that we have thirty and forty-year-old fish present in the sample? I would say the science says it's not, and productivity says it's not. There is more red snapper today than any time in my forty-two years of fishing, and, speaking on age truncation, we don't really even know what the age composition of red snapper was back in time, back in the 1930s and the 1940s, and we didn't do age studies.

We can see pictures of big fish, and we don't know how old they were. We really don't know, and I just -- It's time to change course. What we're doing is not working, and to constantly have me read documents that have threats, that have the potential to put me out of business, that's just not right, and so I don't know what the SSC needs to do, but they need to change course, and they need to totally address this stock in a different way than we've been doing it, because what we're doing, it ain't working. That's all I've got.

Wait. Do I have time still? I would say something about the right whales. I know that that's not even on the agenda, and fishermen love whales too, but we don't -- We can't live with a ten-mile-an-hour zone for twenty-five or thirty miles for five months or whatever, November 15 to, what is it, May 15, I think, and, whatever it is, it's a long time. Why not more of a compromise, where we have, during poor visibility, or sunrise to sunset or whatever, and so maybe out to ten miles, where we know those right whales are not going to be beyond. I mean, there's a lot of things we could to help those whales without putting something forth that's going to put people out of business, and no one is going to go fishing if they've got to go ten miles an hour. They're just not going to do it. Thank you.

MS. GUYAS: Good afternoon, everybody. I'm Martha Guyas, representing the American Sportfishing Association. I too want to talk about red snapper and reflect on some of the things that I heard in the discussion yesterday. It was mentioned, several times, that red snapper is more abundant than we've ever seen, and we're consistently seeing high recruitment, and it is clear, to just about everybody, that red snapper has responded to the strong measures taken by this council to rebuild the fishery.

According to the discards-only projections that were presented yesterday, we now have a stock, which is supposed to be rebuilt in 2044, that is at a point where rebuilding could potentially be complete by 2025, and this is for a stock that is classified as overfished, because of a lack of older fish in the population. In other words, we have so many fish right now in the population, with such high levels of recruitment, that spawning stock biomass is almost to the level that we thought we needed older fish to reach and that we thought we wouldn't reach for another twenty-two years.

Remarkably, the stock has done this while supposedly undergoing overfishing for basically the past forty years. To me, this raises serious questions about not only the need for time-area closures to end overfishing and rebuild red snapper, but it also raises questions about the reference points and assumptions being used to determine stock status and, ultimately, the measures of success that this council is using to assess and manage the stock.

We also know that the data used in the last assessment present uncertainty, not only the catch and discard data, which have been talked about much around this table, but also some of the fishery-independent data from relatively new data streams that don't provide us with a good historical perspective of this fishery. This is why the concept of using time-area closures for fifty-five species, to keep people from interacting with red snapper, seems so extreme, especially considering the dire economic and social implications for fishermen, the recreational fishing industry, and our coastal communities.

Before taking drastic measures, we need to have confidence in the data and assessments that are driving council decisions. With data collection efforts, like the Atlantic red snapper count going

on now, and the MSE that is coming soon, that can greatly inform assessment and management of red snapper, we urge the council to hold off time-area closures until you have all this relevant information that's being collected now in front of you and you have a new stock assessment.

Given the clear success of rebuilding that we are seeing today, which is at apparent odds with the overfishing and overfished status of this stock, it also makes sense to pause for a bit to take a fresh look at the red snapper stock assessment assumptions and reference points before considering significant restrictions, so that the council and the public can be confident that they're making the right choice about the future direction of red snapper and the snapper grouper fishery as a whole.

Reducing dead discards of red snapper and making changes to manage to allow better harvest opportunities for red snapper is a goal we all share, but snapper grouper closures aren't the way to get there, with a stock that, by all measures, is historically abundant and has rebounded. We support the council's decision to pull time-area closures out of Amendment 35, and we support and stand ready to assist with looking at additional ways to educate fishermen on the use of descending devices and best fishing practices. Moving forward, we also support looking at using exempted fishing permits to test other ways to manage this fishery and provide harvest opportunities that reflect the success in rebuilding this fishery, and I see I'm out of time, and so thank you.

MR. GENTNER: My name is Brad Gentner, and I'm a fisheries economist, and I worked as a senior research economist for NMFS and Science & Technology for eight years. First, I want to thank this council for addressing the FES data conversion as a simple clerical issue, instead of letting it blow up into an allocation fight, which it is not.

Second, I want to support the state-level license endorsement for reef fish fisheries to improve data collection. We have to get away from taking drastic measures using unsure science. Anglers trust the states, and the states can run these programs so that they generate money to support data collection. The states also understand that harvest isn't what drives recreational -- The massive economic engine that is recreational fishing, and limiting effort is a value-destroying non-starter.

The agency has been told, by many external peer reviewers, that the MRIP is completely unacceptable for in-season quota management, and it lacks the necessary precision for management. NMFS has spent millions of dollars, and now decades, trying to improve this survey, and they are still no closer to being able to precisely measure offshore catches in-season.

The first story I have is a bad one, and this is in reference to state data collections, and that's the Gulf of Mexico. The states, in concert with the anglers, tried to innovate around the issues with MRIP, and, instead of rewarding those states for more timely and more precise catch estimates, Florida, Mississippi, and Alabama are being forced to make their numbers match the lower-precision MRIP numbers.

At the same time, the Gulf SSC recently declared that the Florida survey is the best available science for the stock assessment, and, yet, NMFS still pushes their calibration method, under the threat of sanctions. How is NOAA going to calibrate Texas and Louisiana, you might ask?

Well, they're not, because Texas never participated in the MRIP or the MRFSS, and Louisiana recently eliminated MRIP in their state, which brings me to the good story, the west coast.

Back in the early 2000s, the west coast faced an almost exact same issue this council faces with the rockfish species. Closures were looming, and uncertain discard estimates, and seasons were too short for MRIP to capture. Quietly and independently, the states started their own surveys of rockfish harvest. When everyone in those states had confidence in their estimates, they fired MRIP, or MRFSS at the time, and NMFS gave them all the MRIP funding, and there was no calibration, and there are no more drastic decisions based on unsure science. Anglers are no longer trapped in this artificial accountability fiction.

Let's climb out of this fake accountability box. Recreational anglers are accountable. They have been demanding changes in data collection since I've been in this game, which is going on twenty-five years now. Better data collection means better management. Better management means keeping the economic engine of recreational fishing churning out value and jobs without talking about non-starters like limited entry. Thank you, guys.

MS. RHODES: Hello, council members. I am Cameron Rhodes, and I live here in Charleston, South Carolina and work as a freelance writer and photographer under my business, the Buckskin Billfish. At this time last year, I was a member of my staff. Now I spend much of my time working with various clients in the marine industry, but, tonight, I am here only representing myself.

I come to you with a public comment regarding a species that isn't even under your management jurisdiction. I fully appreciate the council's limitations with management of North Atlantic right whales. However, I recognize that the council has the ability to weigh-in on any proposed measures that would affect fishermen in the South Atlantic. As a result, I strongly urge the council to consider writing a letter to NOAA Fisheries regarding the current proposed rule to modify the seasonal speed zone restrictions for North Atlantic right whales along nearly the entire Atlantic coast of the U.S.

Over 1,200 people and organizations have already submitted public comment to NOAA Fisheries, including myself. In addition to considering concerns from stakeholders in each of your states, I ask that council members also address a reoccurring issue that has continued to frustrate me as an outreach and communication professional, as well as a member of the area's sportfishing community. Please encourage NOAA Fisheries to better communicate with state partners across the region when considering large-scale management measures such as this.

Staff there have indicated that they expect roughly 16,000 vessels to be impacted by these proposed regulations. It's my understanding that there has been little to no communication with state partners on the rollout of this rule, one that is expected to take place this fall, in time for the upcoming calving season. I am continually disappointed by NOAA Fisheries' lack of respect for the expertise that state agency staff can provide regarding their stakeholders. These folks understand the nuances of fisheries in their region, and, most importantly, they know how best to communicate with fishermen in their states. They should be treated as trusted partners in the rollout of any major regulatory change. The fact that they have yet to be included in the conversation is cause for great concern. When I asked NOAA staff about their plans to

communicate with recreational stakeholders, it was clear to me that little had been done to embrace the scale of this enormous effort.

Although you are not responsible for the management of North Atlantic right whales, you have been tasked with the responsibility of hearing the concerns of fishermen in each of your states across the region. As you will see from a presentation later this week, this regulation will indeed impact many of those stakeholders.

If the intent is truly to impose regulations to better protect this highly-at-risk species, then it seems that awareness and compliance ought to rank very high in NOAA Fisheries' list of priorities. As a result, thoughtful consideration of large-scale outreach and communication initiatives is necessary, including, but not limited to, collaboration with state partners, popular mobile fishing apps, such as Fish Brain and Fish Rules, relevant media outlets, and recreational fishing groups.

In addition, I would like to congratulate staff on their many achievements this year, including the launch of a new website, continued expansion of the Citizen Science Program, the development of a comprehensive best fishing practices outreach program, and countless other initiatives spearheaded by my friends and former colleagues. You've got a whole bunch of rockstars over there, and you know it, and I look forward to seeing more from them, as they continue to help you tackle some enormous challenges in fisheries management in the South Atlantic.

I know I'm out of time, but I just want to point out that I totally agree with Robert Johnson, and I think a lot of people are going to get tied to the dock, as a result of these right whale regulations that are pending, and, if you listen to the folks who are already speaking up about this, as well as industry representatives who are likely to speak up, I think you're going to hear some resounding noise from them that is likely all saying the same thing, that this is going to be a big deal, and so please do right that letter to NOAA Fisheries sharing your stakeholders' concerns. Thank you.

MR. NEWMAN: My name is Thomas Newman, and I'm commercial fisherman from the northeast part of North Carolina. I'm also a part-time employee with the North Carolina Fisheries Association, and I'm also one of the members of your Mackerel Cobia AP, and I'm just here to listen to the presentation on Spanish mackerel next week, but I just wanted to thank the council for listening and getting the stock assessment put on the schedule and actually listening to the fishermen and working with the fishermen, because you all do a lot of good things, and the staff here is great, and the council is great.

I also wanted to thank the Science Center for getting the stock assessment done in a timely manner, and I also want to thank the SSC for not approving the stock assessment. There is a lot of data that need to be added into this stock assessment, and I really appreciate their time and listening to the fishermen's comments at the SSC review, and, also, I just want to reiterate that Spanish mackerel is a very important commercial species, especially to the State of North Carolina, and I just want us to get the stock assessment right and have all the data available up and down the east coast and not just the data in the South Atlantic management area, because these fish are moving further north, and we have a lot of good data from the Northeast Science Center as well that I'm hoping can be implemented in possibly this stock assessment, or a research stock assessment, in the future.

If you guys have got any questions, I'm one of your advisory panel members, and I will be here tonight, and tomorrow as well, and so feel free to contact me, and I haven't said hi to the new members yet, and hello.

MR. HITE: Good afternoon. I'm Davy Hite, and, for those of you that were there, a lot of you I guess, at Jekyll Island, I spoke, and Martha told me, after I was done, on the way home that afternoon, that I was considered the best, third-best, of all the comments that were made that day, and then I started doing the math, and there was only three people that spoke.

Again, my name is Davy, and I was a professional bass fisherman for twenty-four years. The last five years, I've been cohosting the Bassmaster television show on FOX, and so fishing has been my livelihood, and I have raised my family, you know, and it's so precious to me, and that's why I'm here, but, as far as saltwater, I've always just been a recreational angler, and so a lot of these people have a lot more in the game, and I'm just a recreational angler. In forty years of saltwater fishing, I know when I've gone out, in the last few years, I catch more red snapper than I ever have, and that's just what I see.

The other thing, that I think I can best relay, is, through my fishing career, you know in social media and this and that, I speak to a lot of people, throughout the whole country, about fishing, fresh and saltwater, because, so many freshwater fishermen, their passion is to, you know, to saltwater fish also, and, you know, I can make a post of a picture of a big fish on social media and get hundreds and hundreds of comments, and I am diligent about responding to those people and interacting with them, and so I really talk to hundreds and hundreds and hundreds of fishermen multiple times a week, whether I'm a tournament or not.

All I really want to say it's unanimous, and I have not talked to a single person that thinks big snapper and grouper closures, or drastic fishing access reduction, is a good idea, and I have not talked to a single person, and, you know, there's not many topics that you can get everybody all-in, and it simply has been that in this case. Thank you for your time.

MR. BRANNON: Mr. Chairman and members of the council, thank you all for having us here today, and I know it's been a long week, and I'm Gettys Brannon, and I'm the CEO and President of the South Carolina Boating and Fishing Alliance. We represent our \$5.1 billion industry here in the State of South Carolina, about 23,000 jobs, many of who are represented behind us, with presidents and CEOs of companies that showed up today for this important moment.

You know, our great governor, Henry McMaster, always says the government should be here to help our businesses and not run our businesses. When we look at some of these proposals from NOAA and some of the chatter from the folks in D.C. that are overreaching on our businesses, it puts us in a position that makes that really not feel true. We appreciate the council coming to bat for the recreational boaters and anglers yesterday in trying to put a stop to closures, as we agree with the science that we have seen so far, and we really would like to see the red snapper count be finished, in 2025, before any drastic measures are taken next.

You know, we understand that the balance between the economy and ecology is more important to this industry than any industry in the United States. If we don't have the waterways, and we don't have the fish, then our industry will suffer than not having a single day or two to fish for

snapper, but a whole bottom closure that would impact fifty-five different species of fish would be devastating, and, from a state management perspective, if you look at the Dingell-Johnson and Pittman-Robertson funds and the different structure and the way those come down, the impact that this will have on excise tax dollars will also be felt down to our state fisheries.

With that, I'm sure you all will not be mad that I'm not going to take up my entire three minutes, because there's a lot of people here to speak, but thank you all so much for your diligence on this, and we're here to help in any way in South Carolina. I know that our builders, that are here today, and our fish and tackle manufacturers, have a lot of commerce, not only in South Carolina, but also in North Carolina, Georgia, and Florida that they care about, and so, with that, we appreciate everything, and we're always here for questions.

MR. VENKER: Good afternoon. My name is Ted Venker, and I'm with the Coastal Conservation Association, and I appreciate the opportunity to speak to the South Atlantic Council today. I think it's really important to take a moment and reflect that this fishery was found to be -- The red snapper fishery was found to be in extremely dire straits a relatively short time ago, and this council took drastic action to close the fishery, which was a difficult pill for almost everyone to swallow, but, for the most part, it was accepted as that was what was necessary to rebuild the fishery.

The short version of events is that those measures worked, and this council should be applauded for navigating this fishery back to a condition where people are saying it's difficult to catch anything other than red snapper in some parts of the South Atlantic. It's a fantastic success story, and the folks around this table should be proud of what you've achieved. Ideally, it's an opportunity to show the fishing public, and that's all these people behind me here, that fishery management works, that a fishery that was in dire straits can be brought back, with some sacrifice by all parties, and, eventually, access to that resource is improved as it recovers.

Ideally, this would be the example you would point to when the next fishery crisis comes along, and it would be that much easier for the public to understand what needs to be done, and it should make your lives around this table a little bit easier, but talk of a bottom closure, based on some pretty suspect bycatch data, and in the face of all this success, risks all that potential, and, as someone said in the council yesterday, it risks the council's credibility. It makes it that much harder to do what would need to be done when the next very real crisis comes along.

At the very least, we would encourage the council to see what the independent assessment that is now underway uncovers before taking drastic action, but, in the larger picture, we applaud the council's discussion yesterday to be flexible, in light of the situation on the water today, and we encourage you to continue to operate in pursuit of the spirit of the law, rather than in rote obedience to the letter of the law, which clearly occasionally creates some unintended consequences, and I will save you some time today and be short as well, and so thank you very much.

MR. BRAUN: Thanks for the opportunity to speak. I was just hoping to give a little different perspective on the red snapper, being that I am a commercial fisherman, and I'm also an avid diver, with thousands of dives in throughout central Florida, all the way up to Carolina, and I have an intimate knowledge of what the reef looks like and what the fishery looks like at that level, everywhere from forty to fifty feet, where you can -- Where there is barely visibility, all

the way out to the ledges, and I have dove the South Ledge, and the Deli Ledge and the Triple Break, all the way out to 198 feet.

The information that you all have, or that you're getting, for a lot of this fishery is not accurate. With the waste of fish, the smaller fish are abundantly more aggressive than the larger fish, and so that's what -- You know, they're not seeing that, as far as the waste and the discard. There is a slew of large, old fish out there, and we catch a lot of them on hook-and-line, and we're catching them because, when we catch a sea bass, or we catch a small, juvenile grouper, these large fish are eating those fish as we're trying to bring them up.

I have cleaned thirty-pound red snapper and found gag grouper in their belly, small gag grouper, and so there's a lot more ramifications to what's going on with the red snapper than just the snapper fishery. We can go out, and I invite this council to send somebody to Savannah and get on my boat any day, and I will take you anywhere you want to go and show you the amount of fish that can be caught in a matter of no time. We can go out in the course of a day, and it's nothing for us to catch a hundred fish, and I see those fish swim off, and swim off strong, and live and survive.

I see fish that break our hooks off at the surface, twenty-five or thirty-pound fish, and then we catch them two days later, and you know they come up in a hundred foot of water, and they have the barotrauma, but they're surviving, and we're catching those fish with the hooks still in their mouths, my hooks, my leader, my line, the stuff that I know, and we're catching these fish days later.

The survival rates that people are saying that these fish are dying after being caught is not accurate, and I can tell you that from experience. I've been a fisherman, up and down the east coast, for thirty-five years, since I was old enough to walk and to get on a boat. I've seen it, and I have lived it, and, as a charter captain, I see the stock and what we get every single day, and I also see what these fish -- Because of the overpopulation that we have now, what they're doing to the stocks of other fish, the smaller fish, the sea bass, the juvenile snapper, the porgies, the other snapper, the juvenile grouper, and I see how hard this fishery is, and the reason that we're catching more red snapper than anything else is because they are so aggressive of a fish, in comparison on how they feed and other fish feed, and they are eating everything.

If something is not done to realistically assess what the snapper is doing, you all aren't just going to have to worry about snapper, and you're going to lose the entire fishery, because there won't be nothing here but snapper in ten years, at the rate it's going today, nothing. That's why your grouper numbers are low, and that's why your sea bass numbers are low, and that's why other things are low, is because the snapper are killing them, because your numbers are wrong. Thank you.

MR. BULCOCK: Thank you for letting me speak. It's the first time doing a public speaking in something like this. I've been a recreational fisherman for thirty years, and I started down in Florida, and I've been in Bluffton, South Carolina for about twenty-five years. Just like everybody else, I'm seeing the same record numbers of snapper out there, and, you know, it's just amazing.

I would really hate to see such a devastating thing with a true fishing closure and the environmental impact -- Just what it would do to the whole industry, and I just realize that you have to have the proper data, and you can't just pull numbers. I looked at -- On the way up here, I looked at some of the numbers, as far as bycatch, and, you know, I think that we really need to look there. You guys really need to look at that and work with this people like this gentleman that just spoke, that is out there on the ground, and I would say those are the kind of people that you need to look at, and maybe work with the states a little bit more before you make a big decision like this.

As far as like for putting permits on the fisheries, I think that that's a great idea, and that will give you a little bit more data before you make these big decisions of full closures and affect people's lives and the whole industry and our recreation, and so I really appreciate you letting me come up here and talk, and I would consider that you guys really look and work with the state on making these kinds of big decisions. Thank you.

MR. DELONG: Thank you. My name is Erik DeLong, again also from Bluffton, South Carolina. Thank you for the opportunity to speak today. First, my comments pertain to the Snapper Grouper Regulatory Amendment 35. I understand that the council is considering a closure of the snapper grouper fishery in response to the perceived red snapper discard mortality problem.

I am opposed to any action that may close the fishery until there is a much better understanding of the evidence to support such an action. To my knowledge, the data used to estimate these discards is based solely on informational surveys of recreational anglers. This type of data collection seems dangerously inadequate to use as a primary driver for the closing of a portion of a fishery, as I would certainly question the accuracy of the data collected in this manner.

We recently established regulations requiring descending devices when bottom fishing. Has there been any data collected to see if that simple measure reduced mortality rates? Moreover, has there even been enough time elapsed to have any effect? I know myself, and my fishing partners, use these devices regularly and have near-perfect success rates on releases.

In regard to the estimated red snapper population, I understand that Congress has allocated funds for an independent estimate of the red snapper population in the South Atlantic. A similar independent estimate was recently conducted in the Gulf of Mexico, which found at least three-times as many snapper as NOAA previously estimated. Moreover, snapper were found in places that NOAA had not even looked.

I can speak from personal experience that, over the past couple of years, we are catching red snapper in places we never have in the past, frequently in much shallower water, closer to shore, as well as even as close as two to three miles from the beach. As many recreational anglers would tell you, it has actually become very difficult to catch anything but red snapper in many of the locations we have historically fished. I would ask you to hold off on any drastic management actions until the new red snapper count has been completed and that new information is incorporated into a new stock assessment. We all want to do our part to conserve the resources, but it would be unfair to jump to any conclusions without having the appropriate and accurate data to guide us.

My second comment pertains to Snapper Grouper Amendment 46. As we just discussed in Amendment 35, the council is considering the closure of the snapper grouper fishery, due to the perceived red snapper discard mortality problem. While the last stock assessment found the red snapper stock to be overfished and undergoing overfishing, from an angler standpoint, their population is at an all-time high and growing. Before we even consider closing a portion of the fishery, it is essential that we first get the best data we can to make any decisions.

There have been discussions on instituting a federal permit requirement to identify the number of anglers targeting snapper and grouper. I fully support a permit requirement for snapper grouper fishing, as it will certainly provide better data. However, I don't know any recreational angler who is pleased with how the federal government handles our data. I feel a better solution would be to develop a state-based permit and data collection program in Georgia, North Carolina, and South Carolina.

A state-based program, like the one that already exists in Florida, would still provide the necessary information, but significantly improve the timeliness of the data. State-based control of the Gulf of Mexico red snapper fishery has paved the way to create an evolving program that state-based data collection programs in the South Atlantic will have the advantage of learning from to constantly improve results and eliminate concerns regarding calibrating data between state and federal levels. I am in full support of requiring a state-based permit to fish for snapper grouper species as a way to obtain more accurate and timely data on the recreational catch and discards. Thank you.

MR. ANDERSON: Good afternoon, and thank you for the opportunity to speak today. My name is John Anderson, and I'm a recreational angler concerned about the measures being considered today by the council. My comments pertain particularly to Snapper Grouper Amendment 35.

I am opposed to any action that may close this fishery, for any portion of the year, until we have a better handle on the data to support such an action. It is my understanding that the data used to estimate these discards are based on recreational surveys where anglers were asked how many they've thrown back on a particular day. This type of data seems awfully weak to use as a primary driver for closing down a portion of the fishery.

Who really knows if those guesses are accurate? If this is how you're estimating recreational discards, I would like for this data to be better verified for accuracy before doing anything. Did we not just implement requirements for descending devices to be on all boats bottom fishing offshore? Has there been any attempt to collect the data on the effectiveness of these regs to reduce bycatch mortality?

Simply put, the economic impact of closing the fishery, the way it is being discussed, would impose irreparable harm on our coastal communities and small businesses that depend on recreational fishing, not to mention these proposed actions would cut off one of the pastimes I have thoroughly enjoy, which is already limited by the little amount of free time I have and the need for that free time to coincide with favorable seas.

My experience, over the last ten-plus years, fishing off the coast of Hilton Head Island, tells me that the red snapper fishery is flourishing. I have gone from never having caught a red snapper

to catching them in places I have never seen them before, and, by the way, I have been utilizing descending devices on every release, even before it was required. I believe I speak for many anglers, saying that we all believe in sustainability and the need for healthy fisheries. All I ask is that the council move very carefully before making such a decision and ensure the supposed solution is not worse than the perceived problem. Thank you.

MR. PFEIFER: Thank you for giving me the opportunity to speak today about the widespread bottom fishing closures. I'm Dave Pfeifer, and I'm the President of Shimano North America Fishing. We own Shimano, G. Loomis, and the PowerPro Brands, with our headquarters located nearby in Ladson, South Carolina.

In addition to my role with Shimano, I serve on the board of directors for the American Sportfishing Association, the Center for Sportfishing Policy, and the Coastal Conservation Association, as well as in a management council position with the Congressional Sportsmen's Foundation and Theodore Roosevelt Conservation Partnership. Shimano North America employs roughly 300 people that support our fishing tackle business.

The Southeast Atlantic bottom fishing market is important to us. It's a fishery that is available to anglers of all socioeconomic levels and generates roughly \$50 million in sales annually, just for our company. Any changes in the bottom fishing regulations would equal hardship to anglers and businesses that rely heavily on access to this fishery. Through my involvement with the advocacy organizations that I mentioned earlier, I always have advocated for necessary regulations when the science supports them.

I have watched the issues surrounding Southeast Atlantic red snapper for a long time. Despite an explosion of this population, season length and bag limits have not been extended, due to the lack of science to support such an extension. Therefore, we look forward to the great snapper count, in anticipation that the science will confirm what we, as anglers, see every day in our fishing experiences. We have been patient, as an industry, and as anglers, in this fishery.

Now we face the threat of more widespread closures to the bottom fishery, despite there not being science to support such a move. Lack of science has prevented changes to the red snapper fishery, and, therefore, a lack of science must prevent changes to the current bottom fishing regulations.

Observationally, as an angler, I can say that I've been fishing off of South Carolina for over five years. When I started fishing here, gag and scamp fishing was great in the 100 to 150-foot depths, with limit catches common, and we rarely ever caught red snapper. In the last few years, our fishery has changed. Red snapper are abundant on all of the bottom structure in the sixty to 150-foot depths, and the majority of those fish are mature adults. Now the opposite is true, where we rarely see grouper in these depths. Instead, we now are catching grouper in the 200 to 300-foot ranges, where they can get away from the highly-aggressive red snapper.

The grouper population is not less. They just have moved to adapt to the explosion in the red snapper population. Until science can prove or disprove our own angler experiences, we request, with all due respect and fairness, that no changes are made to the existing bottom fishing regulations. The hardship to anglers and businesses that rely on this fishery is too great to move ahead without the clear science to support such a change. There is not another fishery so readily

available to anglers that will offset the economic losses to businesses reliant on this fishery. Thank you.

MR. WIGGINS: Thank you to the council for allowing us to speak today. My name is Robert Wiggins, and I have lived in South Carolina all my life, which is a long time. I look around the room, and I see maybe one person in here that has probably fished this fishery more than I have, and that's Spud Woodward.

I fish for several species in this great state that I live in, and the one that I most enjoy is bottom fishing. I tournament fish, and I fish blue water, but bottom fishing is really my favorite, and I can tell you that I am speaking on facts. I'm not a scientist, and I'm not a mathematician, but I can tell you that the grouper and snapper species are not in the shape and condition that you think they are.

Just on a recent trip, and I had two of my friends, and we went to a spot that I never caught a snapper before, and I was trying to catch triggerfish and black sea bass, and I couldn't get away from the snapper, literally. We caught nine -- I call them fire trucks, because they were, and we caught nine snapper in less than an hour. Now, in the data that you send us when we are snapper fishing, you tell us to move from that spot. I couldn't catch another species there, and I did leave that spot.

Before I did, I caught nine, and we sent all nine of them back down with a descending device. Three of those didn't make it, and so, you know, I don't know that the descending device is necessarily the way to handle that, and so we moved from the spot, but that particular spot is in eighty feet of water, and, just this year, I have seen more red snapper caught from eighty feet to 150 feet than I have in my entire life, and I've been fishing on this coast for fifty years, or longer, and so I am asking the committee, and the council, to reconsider, you know, the closure, because the stock is not decimated.

I mean, this gentleman is a commercial fisherman behind me here, and, I mean, he said just about everything that I was going to say, and I actually feel sorry for these guys. I don't have to do this for a living, but they do, and to take this away from them, and me -- I have grandchildren that I want to be able to fish for snapper, and I spend more time with children and women on my boat, teaching them how to bottom fish, than anybody else in my neighborhood, and so I implore you and ask you to please reconsider this closure, and, you know, get somebody out there. I'm like this gentleman. Come get on my boat any time. I would love to take you out there, and I've taken numerous people in this room on my boat before, and let's take a count. Let's wait until the great snapper count has been done before we make this decision. Thank you.

MR. SUTTON: My name is Forrest Sutton, and I am a current resident of South Carolina. I've always lived here, my entire life, in Mount Pleasant, and I'm a recreational fisherman. We only have a twenty-one-foot boat, and so we only have limited days that we can go out, and, with the red snapper season only being three days, or a year, essentially, it cuts off a lot of my time. I personally, I have never targeted a red snapper. I've never had one on the table, and we always go to the nearshore reefs, and we always go to structure out there, only about thirty-five miles.

We've only caught a few snapper, but they were big. The biggest one we caught was a big, three-foot red snapper, and sent him down successfully, and I know the release items are

required by law, but we've always had them on our boat, from the very start, because we always want to have good fish release, because, as a fisherman, I hate to see a fish dead on the surface of the water and there's nothing I can do about it.

I mean, I know there are also better ways, instead of closing off bottom fishing for the entire South Carolina or the east coast, and, like I really said, it really cuts out on how much fish that we can personally eat at our household, with the limited days that we can fish, and so I vote no on the closures for closing on the bottom fishing for the east coast, and that's it.

MR. PINCUS: I want to thank everybody for letting me come up here and speak. I appreciate you all taking the time to come here and set this up. I can't read off a little iPad, and so I've got some big notes, and so I hope you all forgive me, but my name is Captain Mark Pinkus. I'm from Hilton Head Island, South Carolina. I run a charter boat, and I run three statewide saltwater tournaments here in South Carolina, and I've been fishing South Carolina waters since the 1990s.

When I say I've been fishing these waters since the 1990s, I've got some time on the water. I'm not just a weekend guy. I've got a lot of time on the water, and I've seen firsthand the difference in our stock from then until now, and it's been an amazing recovery. All these folks you've heard speak are speaking the truth, and what we see out there is pretty intense, when we're looking at trying to catch other species, and I will just give you my personal example, and this is outside of bottom fishing.

I'm an avid tournament king mackerel fisherman, and, from sixty, eighty, ninety, to over a hundred feet, it's been very, very difficult for me to fish some of my most productive king mackerel numbers anymore, because I get swamped with red snapper coming up, and I mean coming up all the way from the bottom all the way up to get my surface baits, and we literally have to pick up and leave, because we just can't get through them to catch king mackerel.

You know, as a charter boat captain, and as a tournament director, you know, I'm in constant contact with fishermen, recreational on the pro side, and all parts in between, and it's something that I've got a passion for, and I love talking to the folks. I'm around them all the time. My three tournaments kind of go throughout the year, and so I'm around this, and it's the same story that you guys are hearing, and it's the same thing I hear. It's an abundant fishery out there, it really us.

I am just going to give you one example. A charter boat captain down in Hilton Head, Dave Peterson, owner of The Salty Mistress, I had a conversation with him the other day, and he showed me three videos from really recent trips, I think as early as last week, and there were three different depths and all the same results. There are wolfpacks of red snapper coming up, and one of the videos was interesting, because, you know, sometimes when you're bottom fishing, a nice big mahi comes swimming by the boat. Well, they went to pitch a bait to that mahi, and he had no chance, because a wolfpack of red snappers came up and chased that bait around, and so, you know, Dave -- He's been telling me these stories for years, and it's the same thing you're hearing from all these guys, and I believe it's true.

I am going to switch gears and just talk about the economic part, real quick. You know, the hardship that this closure will do -- It's going to affect thousands upon thousands of middle-class, hardworking Americans. It will be devastating to a lot of them, and they'll be put out of

work. Fishing, for some of us, it's all we know. You know, right now, with this failing economy, especially for the middle class, I think it's a horrible time to be thinking about putting a bunch of us out of work over what I think is inaccurate information, or not enough information, and I think we can do a whole lot better than that.

Just a couple of notes on that. I mean, you're talking about a huge industry, as the gentleman from the recreational alliance mentioned, and I'm just going to mention a few charter boats, the boating industry, captains like myself, tackle stores, tackle manufacturers, so many small businesses that are going to be affected by this negatively, and then not to mention, and I will mention, and not to mention, but the entire Southeast coast that relies on tourism, and that's going to be a devastating effect to tourism.

A lot of people come to go fishing, and bottom fishing is one of the most popular fisheries that we have, and so it's pretty important to make, you know, decisions based on good information, especially when you're going to put people out of work, and that's what is going to happen.

As far as the information you guys get, you know, I mean, I know you're supposed to make decisions based on the best information, and I don't believe that the discard mortality information is a reliable source to go ahead and make such a drastic measure as closing down an entire fishery for the Southeast coast, and that's just -- It just raises red flags to me, and I think to a lot of the people that I talked, and it's just going to have more public distrust, you know, to managing bodies such as yourselves, and, you know, that's not the direction you all need to go.

We have so many people here, these captains, willing to work with you, and you can come on my boat, or come on their boat, and, I mean, let's get it done, and I think it can happen, and it can happen in a relatively fast way, if you all, you know, make it happen. Take steps to make it happen.

One thing that I want to mention, on the information side too, is, you know, you all have got a big group of states on this Southeast side, and I'm just going to -- You know, I have fished all around the Southeast, from Louisiana to North Carolina, but, you know, South Carolina is my home, and, when you group us with Florida, I don't see how you get really good data from that, and I may not know it all, and you guys may have better -- You know, you may have an explanation for this, but, you know, South Carolina -- The population, the distance to the fishing grounds, the weather permitting us to go fishing, it's just a huge accessibility difference between us and the state of Florida.

You guys can look at the last two years, I believe, and it may even be longer than that, but the two days that you gave us to fish -- The weather was so bad that at least three-quarters of the people that would have gone fishing couldn't go, because the weather was bad, and it's just an example, to try and -- You know, in Florida, you can go, you know, a couple of miles off the beach, in some places, and be in a thousand feet of water, and it's just different accessibility, and I know I'm out of time, and so I'm going to skip over some of the rest of this stuff.

I wish you all would wait for the independent study. I think it's really important to get all the best information you can, and, you know, we're all here to help you. I think, at some point, when you come to me and say, Mark, we're going to shut down the entire fishery -- I mean, that, to me, is admitting failure. When I see what's going on out there with my own eyes, that's the

conclusion that I come to, and I'm not talking about failure of a species, because it is a record -- I believe it's an incredible fishery that has grown and come back, but just on the other stuff, and let's get the process together.

Let's work together to get it done, and I think we can come up with a great system, and I think you all can do a lot better than what's going on now. I know you all have got it in you, and all of us are here to help, and we're not trying to fight anything. We're here to help, and so thank you very much, and I hope you will take that into serious consideration.

MR. STRELCHECK: Mark, thanks for being here, and I have family in Hilton Head, and I fish the coastal waters there quite often. I've heard, from you, and I've heard from a couple other speakers, about entire closure, and I'm just curious, in terms of kind of what information you've received and how it's been described to you.

MR. PINCUS: So I've gotten several of the posts that have come out, and I've got some stuff from several different people, and so I would be happy to sit down and show you at the end, but it seems like you all are trying to close down an entire fishery, and is that not accurate? If it's not, I apologize, but I would like to --

MR. STRELCHECK: That's why I wanted to make the comment.

MR. PINCUS: I appreciate there.

MR. STRELCHECK: There's a lot of frustration around this, and this is my perspective, and I won't speak for the council, and so I'm the Regional Administrator for NOAA Fisheries. A lot of people have talked about discards as a problem, and so, at the last meeting, I had requested, and the council had agreed, to consider some spatial and temporal depth-based analysis, just analyses, and we haven't drawn any boxes on a map, and we haven't presented anything at this point, and we're not talking about shutting down the entire Southeast Atlantic Ocean, and so, at this point, it's very much conceptual and not anything in writing. We haven't even decided if we're going to move forward with it, and I just wanted to kind of clarify that, because I feel like it's been expanded out that we're shutting everything down.

MR. PINCUS: Right.

MR. STRELCHECK: The closures, I will say, if we did move forward, would consider, obviously, snapper grouper bottom fishing, and not just red snapper fishing, but there is debate, obviously, as to whether we'll consider those things, and so I just wanted to clarify that for everybody else.

MR. PINCUS: Right, and I appreciate that, and that's probably part of, you know, what's going on, is a little bit of lack of good information getting out. I will definitely do better on my part, and I'm here to help you all, and so, if you need anything from me, I'm right there in Hilton Head, and thank you all very much, and good luck, and please let me know if we can help.

MR. DOZIER: Good afternoon. I'm Paul Dozier, and I'm from northeast Florida, and I also attended the Jekyll meeting, and it's good to see this turnout here. There was just three of us there, and so I, like Mark, produce fishing tournaments in northeast Florida, and I'm also a

lifelong angler, and I've seen it all. I've seen the good, the bad, and the ugly. We can go through everything that everybody has said, and I agree with all that, but I'll be short and sweet.

One thing that I brought up at the last meeting was the current way that you guys let us access the snapper and what I deem as the irresponsible one-weekend, two-day season. I don't know what the right way is, but the way we're currently doing the limited two-day opening is irresponsible. Four boats sunk off of Jacksonville, and these people treat these red snapper like they're gold, truly, and everybody wants to go catch a snapper, and it's dangerous, and it's just a matter of time before somebody dies, and we talked about that Jekyll, and you guys, I think, took note of that, but at least put a weather -- Mark said the weather was terrible in South Carolina, and it was terrible in northeast Florida as well, and I had a good friend that lost his boat and lost it all, lost his business.

I think, when we talk about shutting down fisheries and all this, and I appreciate what you said, sir, about that, is, you know, sometimes -- You know, there is consequences for everything. If you shut down fisheries, you put people out of business, and it's bigger than -- Sometimes it's a bigger deal than that, you know, and I think we might have all learned something with the COVID shutdowns. You know, everybody says that the suicide rates went up, and you're going to put a lot of people out of business that know nothing but fishing. That's their trade. That's their craft.

They are fishermen, and they've been fishermen since they were little kids, these charter mates, and these charter captains, and, if they don't have anybody to take fishing -- That goes for the whales, too. I mean, it's a tough deal. These guys can't just go out to start a new job at forty or fifty years old, when they've been fishing for their whole lives, and it could lead to bigger problems than this, and so I think the human element of this needs to be considered.

You know, I can give more examples of fishing, and the red snappers are eating our blue runners, king mackerel fishing in Florida, just like they are up here from Mark, and there's a lot of red snappers, guys, and you should be commended on that, and I appreciate the opportunity to come up here, and we care. A lot of people care, up and down the east coast, and we all want what's best for the fish, but we also want what's best for the fishermen. Thank you.

MR. MCCLURE: Thank you all, council. My name is Jim McClure, and I'm the General Manager for Butler Marine of Charleston. I've been in the boat business for about twenty-five years, and I'm a native Charlestonian and an avid fisherman. I think we should all agree that shutting down the red snapper fishery to the recreational fishermen will have a negative impact on our local economy. To what extent, we really don't know. However, this really isn't what we need, with a struggling fishing economy right now. Tackle stores, boat dealerships, repair shops, and many, many others will feel the negative impact, along with their families.

Shutting down the red snapper fishing is not the answer, I believe. I believe that imposing a reasonable creel limit and length would go a long ways, and, also, enforcing the rules and regulations that we already have. If someone breaks the rules, there should be penalties, stiff penalties. I don't get to fish as much as I used to. I work too much, but I used to love to catch black sea bass and triggerfish, any type of bottom fish.

Back in the late 1980s or 1990s, oh, wow, there's a red snapper, but I can't get to the black sea bass right now. Red snapper are almost like the hyenas of the ocean. They're in sixty feet, forty feet, eighty feet. If you drop a finger mullet down in eighty foot of water and try to catch you a black sea bass and see what happens, and I will take anybody out on my boat, and we'll go sit in eighty foot of water, and not Bob's eighty foot, but my eighty foot, but I just don't think that's the right thing to do right now. Thank you, all.

MR. FLOYD: Good afternoon. My name is Chris Floyd, and I have charter fished from Key West, Florida to here in Charleston. To be honest, I don't get it. There is -- You close it when there's too little fish, and now you want to close it when there's too many fish, and so where do we find the happy medium? When do we find the happy medium, but, really and truly, at the end of the day, the council is here to represent us. I think you know where we stand, and we expect you all to represent us in a proper way. Thank you.

MR. HANCOCK: Thank you for the opportunity. My name is Tommy Hancock, and I'm the president and owner at Sportsmen Boats. I'm here with quite a few of my team members today, and I am going to speak to you, very briefly, from two perspectives, one as an avid angler, which I am, and I mostly troll, pelagic fishing, and some of my team members are really good at bottom fishing, and so I get to go with those guys, and we've experienced the same thing you've heard from these other guys with the red snapper.

Secondly, as a businessman, we manufacturer boats here in Summerville, South Carolina, and twenty feet to thirty-five feet, currently, is our line of boats, all saltwater fishing boats, which, obviously, this fishery is very important to us and our customers. Probably 50 to 60 percent of our sales are in the region that this council resides over, the South Atlantic, North Carolina, South Carolina, Georgia, and Florida, and so, obviously, we're very keen and pay close attention to what this council governs and recommends for those fisheries.

I think so many things have been said very well by the folks behind me, and so I won't go into a lot of the things that has already been said, other than just to say that we would implore the council to wait and get the data, and we know the great red snapper study is being done. Let's get those real numbers, make decisions on real data, and not other noise out there. Thank you.

MR. ROGERS: Good evening. We just want to -- I'm Ritchie Rogers, and I'm the Director of Sales for Sportsmen Boats, and I work for Tommy, and we just want to thank the council for allowing all of us to speak, because it shows a lot of respect on your behalf, and that's what this is really about. This is all about respect. You respect our opinions, and we certainly respect what you're doing for us, and so thank you, all.

As Tommy mentioned, we have over 400 employees, and we've got 400 families, of our sportsmen family, that are dependent upon what our products do, and our products are designed with all sorts of fishing amenities, fishing features, that are designed to attract customers that are all as passionate as everyone in this room behind me is about the sport of fishing, and so it's very, very important for us to get this message to you guys, and, just like Tommy, I won't go into any more detail, and it's very clear that we all stand united that we would just implore the council to please consider holding off any movement, or idea, of any type of closure, whether it be area-wide closure, seasonal closure, or anything to that effect, in regards to bottom fishing, and that is very important to each and every one of us.

As Tommy mentioned, it's very important to our sportsmen family, and we are -- I think Gettys had pointed out, earlier this evening, that, you know, we are just a small part of a, you know, \$5 billion economic impact within the industry, just here in South Carolina, and so this goes far above just the ecological impact, and this is much bigger than that, and so, with that, we just ask, again, to please reconsider any idea of any closure until further studies are completed and evaluated, and we would certainly all appreciate that, and, again, if there's anything that we can do to help any member here of the council, please feel free to reach out to Tommy or myself, and we would be more than willing to help in any way we could. Thank you.

MR. HUFF: I'm James Huff from Mount Pleasant, South Carolina. I'm a charter boat captain, and I've been so for twenty-seven years. I have an extensive biology education, and I'm also a personal chef. I want to thank the council for what you've already done with regard to this species and other species, and thank you all for having us here today, especially this finely-dressed gentleman over here.

I am here today to discuss the current red snapper populations, as I have seen with my own two eyes, as well as concerns that I have if the bottom fishing area closures occur or individual species closures occur. I would like to say that I am sympathetic to the plight of the commercial guys here, because I can see that, if red drum, for instance, were taken off the docket, that I would probably go broke and have to find another job as well, and so I understand where the commercial guys are coming from.

Yes, I own and operate an inshore business, which is a little different from what these guys are talking about with regard to red snapper, but, on occasion, when it's calm enough, I run out to the twenty or twenty-five miles to catch other species, red snapper being one of them. Since it's always too rough for my twenty-two-foot flats boat on the two days that we are allowed to go keep red snappers, we do a lot of catch-and-release, obviously, which brings me to the first topic that I would like to discuss, which is the discard fishing mortality estimates by MRIP.

They are notoriously inaccurate, and implementing closures based on this data may result in a public distrust of the council, which I would not like to see. I see more education as one of the possible solutions, more education on safe release of these species, with the required methods and devices.

Another related issue to this is the enforcement of the current regulations. As a red drum fisherman, I've been using release devices for over a decade and have never been checked by anyone, to see if I have them on my boat. As a responsible angler, I use a descending on every single species that I catch that requires it.

The council and NOAA Fisheries should reject bottom fishing closures or other drastic measures for red snapper and the snapper grouper fishery. It does not make sense to move forward with these closures, or measures, that will have devastating impacts to the economy of recreational fishing while the Atlantic great red snapper count and other independent data collection efforts that will inform red snapper management are underway and due to be included in an upcoming stock assessment.

I implore you to please wait until that study is complete, and, obviously, that data is going to be 100 percent related to what you guys are talking about, and it's going to be, undoubtedly, an estimate that I think you guys are underestimating. I see the red snapper out there, every single time I go, and, yesterday, I was trying to catch two cobia that we saw on the surface, and, every time we pitched a bait to them, the red snapper would eat our bait. Two weeks ago, I went out there in a twenty-two-foot flats boat, and every single bait that hit the bottom, and I'm only twenty miles offshore, and I'm only in sixty to seventy feet of water, and it's not like I'm going out to 180 feet, where most of these guys are catching some of these bottom fish.

Twenty years ago, when I first started guiding -- Like I said, I've been a guide for twenty-seven years, and, twenty years ago, I would have never thought about catching red snapper in a small boat, and so I can tell you that the population is definitely increased from what it was, and it's way under what you all are estimating, and so, in conclusion, I just ask that you guys wait until all these estimates come out and these independent studies are done. Thank you.

MR. RUTHERFORD: I really can't thank you enough for this opportunity to speak on this topic, which is incredibly important to my district and to my state, and I think all of the South Atlantic states, actually. I would just say that I know, over the last ten years, this council has thoughtfully worked to rebuild the red snapper stock in the South Atlantic, and we've followed that, and, thanks to all the hard work, red snapper, I believe, is more abundant than most of our anglers have seen in their lifetime, probably.

However, as the stock recovers, we find ourselves in a bit of a catch-22, no pun intended on the catch, but, the more fish there are, the more fish are caught and thrown back, and, as an outdoorsman and a proud angler myself, I understand the importance of a strong, sustainable fishery to our state and the local economy. However, due to a lack of good, independent data on stock size and the discard mortality rates, we find ourselves here today talking about this issue, with short seasons, that are getting shorter every year, and talk of now even potentially large area and time closures in the South Atlantic.

I can tell you, in Florida, recreational fishing, and I know many of you already know these numbers, but recreational fishing alone provides \$14 billion in economic output, and the state's recreational fishing industry, and I'm just talking about Florida, I believe, supports approximately 115,000 jobs, and so the six-day red snapper season, just as an example -- The six-day red snapper season that we had in 2018 added \$13 million to our GDP alone, \$13 million, and so it is not an insignificant effort here.

Area closures would have a significant impact on all sectors of the industry, and, quite frankly, it would destroy the livelihoods of many and would be decimating our small businesses that support the fishing industry across the South Atlantic. To get better data, Congress, and I've been a big supporter of this, has appropriated \$5.1 million, over the last three years, to fund the South Atlantic great red snapper count, which will provide better data on the total abundance and genomics and mortality of the fish stock.

Now, I know this study began in 2021, and we hope to see that data by 2025, and that's the plan, but I can tell you, from what I'm hearing, and I'm sure you're hearing the same, is the study is actually running ahead of time and under budget, and you don't hear that very often, on time and under budget, and I love that, especially when it's being funded by Congress, and so, to suddenly

now prohibit fishing in large swaths of the ocean, not just for red snapper, but for many other affected species as well, really without considering the independent data that we're working on right now, I believe would be irresponsible, and reprehensibly, quite frankly, and that is why I want to urge you to not consider, at this time, area closures, and other significant management decisions, until this new data is incorporated into our stock assessment. With that, I yield back.

MR. MCCROSKEY: Guys, thanks for having me, and I would like the record to show that I've had Senator Chris Kamson wire a blue marlin for me, and now I've been yielded to by a congressman from North Carolina. Like I said, my name is J.R. McCroskey, and I am originally from Greenville, South Carolina, and I moved here to Mount Pleasant in 2012, and, unfortunately, I don't have a cool fishing job title like the rest of these folks, and I am just a normal, regular dude that has a twenty-two-foot boat.

I have been involved in habitat restoration and conservation for many years, and it's one of my passions. It's not my job. I am here voluntarily. I do feel the responsibility to make sure that the future generations have the same enjoyment, and access, to our natural resources that I have been blessed to have over the years. From what I understand, the population of red snapper is at historic abundance, but, somehow, NOAA is concluding that the fishery is overfished. This absurdity needs to be addressed to the best of this council's ability.

There was a conversation yesterday about the letter and the spirit of the law, and that is a very important conversation to have. Congress couldn't possibly have expected managers to act like robots, and there has to be flexibility built into the law and that can be applied here. On top of that, we ask that a decision not be made on Amendment 35 until the results of the independent assessment of the red snapper population are reviewed, verified, and released.

I believe, from what I have experienced in my time on the water, that this data will prove that the red snapper population is no longer in danger. As a lot of you guys have already pointed out, there are a lot of red snapper out there. Once that assessment is released, I ask that you come together with the local and state officials to come up with a solution that best fits everyone's needs. A federal reef permit is not the answer. The federal government has proven that a one-size-fits-all solution is not effective.

NOAA is not good at managing recreational fishermen. Decisions need to be made at the state level by those folks and agencies who are most familiar with those fisheries and have the resources and knowledge of how to manage it. Anglers are in favor of better data, and, if a reef permit is indeed necessary, then it should be simply an add-on to the existing state license, and the states should play a primary role in determining how to use that permit to better manage recreational anglers. Thank you.

MR. PHELPS: Hi. I'm Mark Phelps, and I've run a for-hire charter business for over twenty years. I've been fishing my whole life in saltwater, and I'm also on the South Atlantic panel for education and information, and so maybe a slightly different view, but not much. I am not for Amendment 35 to close the fisheries, of course, like everybody else, and I agree there is -- I think everybody in this room agrees there's a lot of fish, but there's a couple of things, I think, and reasons, that you shouldn't stop and close the fisheries. I wish we were having a discussion about how we could open it up for twenty or thirty days a year, to be honest with you, but maybe some day down the road before I die.

We need to get the current stock assessment that he was talking about, and that needs to be in before we do any drastic decisions. I was one of the first people to get given a descending device, and I've been using it for at least five years now, and I'm not the number-one guy for offshore bottom fishing, and I do inshore, and I do everything, but my dead discard rate is 5 percent for the last five years, and I have other captains that I work with that know how to use this, and I would really like some kind of study to help get a better handle on the dead discards, now that we're using descending devices.

We just made this law, and we just got a grant to teach people, and educate people, and we have a fellow that has come in for four years, and I literally helped her do her very first seminar in April, and she's starting to do them, and we are in the infancy stage with that, but we haven't given the descending devices any chance to show that it's more than 5 or 10 percent, or maybe 20 percent, improvement, and this could solve our problem, and we maybe have already solved it, by making that a law, but, yet, we're not accounting for that yet, and we're going to make big closures.

We really need to work hard on that, education, education, education. If it's 5 percent for me, but the average is 35 percent, that means someone is killing 50 percent of their fish. Now, I tend to fish in a hundred foot or less, and I catch fish all the way into forty feet, on mud minnows, flies, whatever, like everyone else, and so I do find that, if you fish in over a hundred feet of water, your discards can go up, and so maybe we need to split things up and look at things a hundred foot or deeper, and maybe there needs to be different rules. It wouldn't be enforceable, but we could try to at least make people do it.

The permit situation, I struggle with trying to help get the Permits Office to get the couple hundred commercial and for-hire captains the correct things that need to be done from the Permits Office. I wish it was better, but it's not. To burden them with three-million people to get a permit would be impossible for them. They can hardly get our permits to us in an appropriate time.

I think a state-based free permit, where they had to watch a video of how a descending device works, and all the laws and rules that go along with it, would be a great idea, that they have to watch the video, like the shark endorsement, and then, from there, they could get their free permit, and then we would have an actual universe of people that we could address and actually get their data from. Thank you, guys, very much.

MR. GRIFFIN: Hello. My name is Charles Griffin. I grew up here in Mount Pleasant, and I've been fishing for a living for about thirty-five years now, and I've had a captain's license since then. The majority of my business is offshore. I do inshore and nearshore, and I'm also now on the advisory panel for cobia and king mackerel.

I definitely have seen, since the 1980s, the red snapper just explode, compared to what we used to catch. I have held grouper and snapper permits, federal, and just what we're catching now, it's definitely -- The data is telling us that there are -- Or at least my data is telling me that there are definitely plenty of fish out there.

I know that, if we close -- A fishery closure will greatly affect my business and every other business that's associated with tourism, tackle shops, and just so much would be lost if we completely close this fishery, and under data that just -- We need to wait and see what the data is going to show us, and I'm pretty sure I know what it's going to show us. I don't -- Any closure, I don't think it's a good idea to close areas and things like that, and I think we ought to address the situations, with better science and the best data we can, and I know a lot of us are all willing to be there to help, to take people out there and show them what we're seeing.

With the discard rates, and me and Captain Phelps do a lot of fishing together, and I use the descending devices, and they are very effective. I probably see, at most, on a bad day, 10 percent that I will see the fish again. You know, I don't know what happens when it hits the bottom, but I know they don't come back up. If I am in fifty feet or less, you really don't need them, and the fish are very healthy, and they take off. I have also helped -- Recently, in April, I did a seminar, helping them discuss -- Helping the South Atlantic Fishery teach people how to use these descending devices.

We have also, you know, used the single-hook rigs, and circle hooks, definitely, and that has done a really good job, I think, in helping these fish, and I think education, and I agree with Mark about that. If we educate people on how to use this more effectively, and we've only been doing it for a very short period of time, it would help a great deal on the mortality of these fish, even though I don't think it's really that bad.

I just would like to -- Definitely I think Amendment 35 -- Just we've got to look at it a different way, and there's just no way that's going to work, and it's just going to affect too many people. I would like to also -- You know, definitely -- We were also talking about the thinking about the grouper -- The whole bottom fishing complex, and that would be a devastating thing, to shut that whole thing down too, and we need to look at each species in different ways.

I have seen more -- You know, the fish are moving in different positions and places and depths and all, to adjust for the quantities of whatever fish is -- Particularly the red snapper, and I think it's moving fish into different places, because I'm finding them in places that I used to not fish before, and so I think we need to look at those kind of studies, to try to verify what's really happening out there, but that's pretty much my thoughts on it, and I would just like to reach out - - If I can do anything to help, you know, I would be happy to.

MR. BROWN: I've been an active diver for about forty years, and I'm Georgia's only commercial spear fisherman. I also own Georgia's largest and only headboat for charter fishing, and we do have a problem with the population of the red snapper. There's an overabundance, and it has created an imbalance of the other fish, like the one that he was saying on the juvenile snapper, I mean grouper.

Our science is flawed, and I will tell you this. In mid-July, I took a team of scientists, NOAA-funded, from the University of Florida, a \$3 million grant, and the University of Florida hired me and paid me \$10,000 to take their scientists for three days straight to look for red snapper, and they gave me twenty-five various coordinates, anywhere from fifty feet deep, 300 feet deep, all around the Georgia coast, and nowhere near any habitat did we deploy the ROV camera to study and to look for red snapper.

At one time, we were passing some juicy coordinates of mine, and I told him this is where we need to look for red snapper, and they were not interested, and so all the spots that we looked at was nothing but sandy bottom, and they would deploy this ROV, with a tether, and motor around, and we would bring the ROV in and move a hundred meters and motor around, and I'm sitting there, and I'm taking pictures documenting what we're videoing, and it's nothing but sandy bottom, and so our next red snapper assessment is going to be flawed, because of these scientists looking in areas of no habitat.

You can go to any marina, and you can get charts and maps, and they will show you where habitat is located, and, when I looked at those habitats, from where we looked at, we were miles away, just out in sand bottom, and so my thought is they don't want to deploy this expensive ROV, and we had three of them, \$25,000 each, to get their umbilical cord tangled in any kind of structure, and so that's where we stand, but we have a population problem, and there's an overabundance of red snapper.

MR. STRELCHECK: Not a question, but I guess I want to thank you for participating in the University of Florida's study, and that was the one that Congressman Rutherford mentioned in his testimony, and I wanted to acknowledge that that study is sampling both structured habitat and uncharacterized bottom, and so it sounds like the component of your study was on the uncharacterized bottom, and I will say that was a really important component of what we did in the Gulf of Mexico, and, although red snapper, and other species, are very low density, because that habitat represents a large portion of bottom habitat in the Gulf, it ended up producing large estimates of snapper, and so I think there's a rhyme and a reason for the participation and component that you were involved in, but it's not the only sampling that's going to happen off of Georgia, and we certainly can put you in contact with the researcher, to ensure that there's other sampling that's going on there.

MR. BROWN: Well, I know they hired Get 'Er Done Charters, and they paid Get 'Er Done \$10,000 to do the assessment here, and I was hoping to run into them, but that just didn't seem responsible, to make any kind of assessment study when knowingly there is no habitat, and that's where the snapper are living.

MR. ABLE: How are you all? So this is my first time doing something such as this, and so bear with me. I'm a little nervous, but my name is Mike Able, and I am owner of -- My brother and I own Haddrell's Point Tackle, which has been a family business since 1983, and, really, I'm coming to you all this afternoon as a concerned business owner, a concerned recreational fisherman, and a concerned father.

You know, we look at these studies, and I will tell you right now that I am the world's worst bottom fisherman. I promise you that right now. As a matter of a fact, I fished on Sunday, and I took my oldest daughter, and she's five years old, and this was the first time she had ever been in the ocean, and I am one who wants to troll all the time. I cannot stand stopping, but, this past Sunday, that saved Dad. Dad was a hero this past Sunday.

You know, that's one of the things that I fear for our future generation, is just, you know, you look at a closure, not just alone, like the economic impact that it has for our commercial fishermen and the tackle shops and the boat dealerships, and those are pretty big, huge concerns, but, in Dad's eyes, Dad doesn't want to lose the fact to be able to take his daughter fishing. You

know, I was raised on the water. I mean, I was in the boat since I was in diapers, and, heck, probably running around naked in the boat, and who knows, but, I mean, my dad had me in the boat when I was a young lad, and that's all I know. That's all a lot of folks behind me know.

That's an aspect that I just don't want to take away from my children and from anybody else's children, and so I hope the council will just kind of consider that, and I will commend -- I mean, being in the shop, being a very good listener in the shop, hearing reports from thousands of people that come in our business each year and talk about the reports of red snapper and that fishery and how it's rebounded -- I mean, I pat you all on the back for that.

You know, I hate that it came to closing, and I don't know how many years ago it was, and, I mean, we used to have a lot of the headboats, the Carolina Clipper and the Thunder Star, and, I mean, a lot of those businesses closed down when the fishery was shut down, because that was their primary source of income, and so, you know, in short, I'm opposed to Amendment 35 for the closure, and I do support, you know, moving the stuff on Amendment 46 to the state. I think that's a better route, and I agree with like Mark Phelps and those guys, as far as making -- Educating the public more, to be a more responsible fisherman, and I think that could really help the amount of fish.

I mean, you look at it, and, if we close down red snapper again, and what species is next? You know, a fisherman is going to want to fish, and so he's going to want to move on to something else, and so it could be another fishery that we're looking at to have to deal with. I appreciate you all's time. Thank you.

MR. SIKES: Good evening. My name is Henry Sikes, and I work for Carolina Composites. We build Pioneer, Bulls Bay, and Avenger bay boats. I am here as an employee of the industry, but I'm also here as a recreational angler and a concerned citizen. What concerns me, as a citizen, is we're doing a count to find out how many snappers we have out there, and we've got two years, and we should have the results, and why are we not waiting on the results of that scientific information that we're supposed to be getting to make a decision on something that we're going to make a decision on flawed science already?

Have we, as a society, become that good at wasting money, because the concerned citizen side of me says that somebody is going to pay for this survey, and I will bet anybody in this room solid money that it's all of us. It's the citizen paying for this survey, but we're going to make a decision before we get the facts? There is something flawed with that.

As a boat manufacturer, it hurts our industry, which is \$50 million a year to the State of South Carolina, and you've already heard that, and I don't know how many times you've heard it, but you're going to shut part of this industry down. You're going to send people home from work, and there's people that are going to get laid off in the boat business, and, hey, we employ a hundred people, and I promise you that we're going to have to send people home if you all do this, because we're going to sell less boats because of it, and we're going to do this because we don't have the facts.

I have some very good friends from Venice, Louisiana, Mike and Bill Butler, who own Venice Marina, and I've talked with them, and they were part of the count down there in the Gulf, and

they've been fishing their whole lives down there, and, when I tell you that they hate fish, they hate fish, because they kill everything I've ever seen them catch, but they are great fishermen.

When they did the count down there, they went out to the normal grounds that they found snapper, and the numbers were low, but what nobody wants to talk about is, when they got off of the normal grounds, and they got out to the other rigs and lines and everything, that nobody really fished for snapper around, they found this overabundance of snapper, big snapper, and the fish are moving.

It's no different than a human. I don't know what the percentages are, but I can tell you it's probably 50/50 that people are born and raised and stay and live their life in one specific place, while I can guarantee you it's less than 50 percent of the fish are hatched and born and raised and stay in the same area all the time, and so, if you go back to those same areas and look every year, you're going to see changes.

Some is going to be good, and some is going to be bad, but you've got to spread your horizon and go and look in other places, because people didn't used to live here. Well, fish didn't used to live here, and that is why we need to wait to make any decision on this fishery until we get the facts, and, if we do anything without the facts, you're doing an injustice to yourself, your fellow citizens, and everybody that is employed in the fishing and boat industry. Once again, thank you, all.

MR. SUTTON: I am Stan Sutton, and I'm just an everyday recreational fisherman, a blue-bird-day fisherman. If the weather is not right, the tide is not right, we don't go. I get my wife to go, and I get my boy to go, and I get my friend, Kevin, to bring some Bo Jangles chicken, and we go out and do a little bottom fishing, and try to catch our little black sea bass, if we can, and some vermilion and trigger, and his wife loves trigger, and, every now and then, we catch a red snapper. We don't target them, but we catch one every once in a while, and we use our little homemade descending device, and the fish disappear, and so we don't see it anymore.

I think that the descending devices are a good thing, and people should have them, and I just don't -- You talk about closures, and you mentioned not drawing any boxes on a map. Well, we have MPAs, managed -- What do you call it, managed protection areas, and those are out there, and we're not allowed to bottom fish those areas, but I would hate to see that the council recommends increasing the MPAs to places that people like me and some of these other folks like to go out and catch the occasional vermilion snapper or trigger, or maybe black sea bass, or other kinds of little critters that we might be able to bring home and have for dinner for a couple of times. Think about us, and think about the guys that likes to go out on those blue-bird days to catch a fish or two and not go inshore and wear out the trout and flounder and redfish. Thank you.

MR. CAMERON: My name is Garrett Cameron, and I've been working with Captain Derek for the last seven years, as a first mate on his boat, and what I was understanding about saltwater fishing and everything, because I come from Lake Michigan, up in Michigan itself, and, of course, I've fished most of my life, and, being on this boat, I have seen quite a few red snappers. On any of our, I would say, eight, ten, or twelve hours, we're not quite -- Maybe sixty or eighty feet, and I guarantee you, on average, we're catching anywhere from twenty-five to thirty per charter.

Now, I'm all about rules, and I'm all about not overharvesting fish. However, the numbers that we're catching is incredible. This year alone, in March, they gave us three days, and so we're excited. Yay. Well, sure enough, we had one group come back, so they could fish on the 10th, which was a Sunday. That got taken away in May, and I'm like, what is going on, and so, as-is, Friday, we couldn't go out. The weather was not permissible. That one day, we were able to go out, and, of course, we were able to get red snapper. There was five customers onboard.

I'm not 100 percent how you all are gathering your information, but I can guarantee you, off the coast of Georgia, Tybee Island, we've got plenty of red snapper, and twelve miles out, fifty feet deep, at the Tybee Reef, we're now finding young yearlings and/or large snappers, and we actually found a snapper hole out there, and so I have seen the decline of groupers, by far, but definitely the red snappers, absolutely. Gentlemen, and ladies, excuse me, trust me. There is plenty out there. That's all I've got to say. Thank you.

MR. COX: My name is Jack Cox, and I'm on the Snapper Grouper AP, and I live in Morehead City, North Carolina, and I've been commercial snapper grouper fishing since 1980, about forty-two years now, and I've just about had enough of it, but I'm trying to give back to the fishery. That's why I'm involved in it, and that's why I'm speaking, and that's why I'm on the AP, and that's why I've done some time on the council, and I would like to see people see what I've seen over the course of my many years in the fishery, and so all I'm doing now is trying to give back and give you guys, the council members, some guidance on what I think will work.

I certainly hope, and I don't think that the council is going to do all this closure that has probably pulled so many people out over the course of all the bottom that we're talking about, but they've got to do something, because there is a discard issue, and they're mandated by law to do it, and it's not fun, and being a council member is not an easy task, but what they don't want to do is take fish from me, and I was in that seat, and I promise you that they're doing what they have to do and doing the best job they can, but Amendment 35, you know, I can tell, you running over an ABC is not the answer, and challenging Magnuson is not the answer.

Yesterday, council members, you heard Sam speak about how well we're doing in fisheries management, and we're at about 80 percent of species not overfished, which is really good, and we do the best job in the world of managing fisheries, and probably second to New Zealand, and, living part-time in Panama, it makes me very proud to see the way our fishery management system works.

I am still actively fishing, and I wish we had some of the red snappers that everybody is talking about here in Morehead. We don't have that abundance of fish, and so, therefore, I'm not going to talk a whole lot about it, but what we do have is very important to us. We have a lot of them as the season starts, but it doesn't take us very long to beat that fishery up, and there's a lot of effort.

All I'm going to say is that it just blows me away of all the recreational effort in the fishery. If I were a recreational fisherman, I would be doing all that I could to help collect the best data to support all these things that you guys are saying and seeing, and I can tell you that it's not MRIP, and it's not a telephone survey, but it would be some kind of -- Most of you guys are saying a state-managed permit system or something, and I think something like that would work fine as

well, but, you know, I'm on the AP, and the AP wants to collect some data, and they want to help the recreational sector get some good stuff other than estimates, and so that's what we're working on.

I want to talk, real quick, about gag grouper, because that's something near and dear to my heart, and I have fished on it for most of my life, and the gags are in bad shape, and I'm talking about in my backyard, and so I don't want to step on any toes, but the gag fishery is in very bad shape, and I would love to see a spawning season that would run through May, because I do a lot of spearfishing, or I used to, and not now, and I would see a lot of those fish spawning in May, right here in about sixty feet of water off of Morehead.

I think a 300-pound trip limit would be sufficient. However, I wouldn't want to see that trip limit go up until we had another assessment. I have a heart for the guys that have the long boats, that stay at-sea for -- Man, three minutes just ain't long enough. That stay at-sea for a long period of time, and I would support Kerry's idea of permit stacking, because the traditional snapper grouper boats that pioneered this fishery need -- They have a place in the fishery, and they need to stay in the fishery, and they can't do it on small trip limits.

Amendment 49, we're going to talk about amberjack, and I would just like to say that I think SEDAR is not right on this one. I think it's being overfished, and, now that we don't have the gag fishery, it's being hit very, very hard off of North Carolina, and I think we're going to see that fishery in trouble in the next assessment, and I would hope that you guys would not go any more than thirty-four. If you drop the thirty-six to the thirty-four-inch size limit, I would hope that you would not go any further down than that. All right, and I see my red dot, and thank you for letting me comment tonight.

MR. LABOCCETTA: Good afternoon. A quick background, and it's been a very interesting afternoon for me, and I've tuned in this year to everything that's been going on with the council, and gag grouper will, I'm sure, use all of my three minutes tonight. I find it very personally insightful, having heard places that I grew up fishing in the various towns, and like Haddrell's Point, and I always went to that tackle shop and used a lot of the tackle that some of these people in this public meeting of yours there attending in Charleston have.

On the other hand, I am a spearfishing industry representative, for the recreational spearfishing industry, and I have been in it since 1997, since I went to college in Charleston, and I have participated in it on a distribution level, and I free-dive spearfished from North Carolina, Oregon Inlet, Rudee Inlet out of Charleston, Hatteras Inlet, and I have resided in Wilmington, North Carolina, and fished, and dove, mostly, out of Masonboro Inlet for the last twelve years. I've been diving North Carolina waters since 1997.

After the last meeting, I composed this, and my concern has to do with the gag groupers, and I wanted to touch on the differences between what we do as recreational spear fishers and commercial spear fishers and offer some anecdotes to this. Again, I feel like my thirty years of industry experience, and I have eleven world records that I broke, and I'm forty-four years old, and this is just my view about what's going on down there for the panel to consider the effects of commercial scuba spear fishing and what it has done to impact our stocks of gag grouper.

The concerns and emotions addressed are accurate, and spearfishing gear is highly selective and efficient. The commercial spearfishing industry, because it is allowed to use scuba and explosive devices, powerheads, is going to destroy these fisheries, and it already has been doing so in the Carolinas, the last ten years or so, and here is why.

Powerheads, commercial fishermen like to use powerheads, because they stun and kill the fish on impact. It saves them air and potentially hazardous situations underwater wrestling the bigger fish that succumb to them. It is not more humane. Sound is three-times as audible underwater, and the impact of a powerhead, which resonate like a death charge, exploding to the fish, has an incredibly deafening impact on not only the fish, but the entire ecosystem where the fish are being destroyed. Smaller fish are stunned, and even die nearby, and larger fish all scamper, akin to a bomb shelter, from the deafening sound. It is a complete and utter war on the otherwise quiet marine ecosystem. There is nothing selective or sustainable related to the use of powerheads.

The use of powerheads also scare away any potential predator, like a shark or other curious fish. It sends all of the grouper or snapper, except the few wise ones that are fish targeted in the snapper grouper complex, into a hole, most of the time. They do not head for deeper water. They head into their lair, immediately, to seek shelter. At this point, it's an easy kill. The diver now acts as a grown lionfish would attack its prey and corners the fish and kills it.

The commercial spear fisher also likes to have a powerhead to kill a problematic shark, but, upon relying on its survival instinct, just wants to eat the diver's fish. A heavy commercial stringer going to the surface is the motivation for an investigating shark to get powerheaded. It happens all the time, and it is unconscionable, to me, that, in 2022, we allow commercial harvesting of wildlife in this manner.

My second point is commercial scuba spearfishing, in regard to its position on selectiveness and sustainability, the best commercial spearfishing model relies on multiday ideal weather windows, multiple dives a day, average non-dangerous technical depths, and efficiency in minimizing energy and resources expended for the highest yield and, consequently, return on investment. One successful diving trip, and please see the likes of Benny the Butcher on social media platforms and Instagram, yields 1,000 pounds of gutted grouper, and that was back when it was a thousand pounds.

Anyway, to obtain this yield, in addition to 500 pounds of hogfish and the other fish in the complex, it makes the most sense to hit a good spot. Grouper and snapper are bottom dwellers, territorial, and associate with structure. When an invader comes towards a reef, they typically approach to investigate and exert territorial display, and this is the sweet spot for any good spear fisher. The first dive, and surprise encounter, always leads to the best fish, before they spook.

Hogfish, in particular, are especially vulnerable to an attack from a diver. An alpha male hogfish is not a dumb fish. By its very nature and evolution, it displays its size to thwart off offenders. It turns broadside and confronts a diver. It does so most of the time as the alpha male protecting his harem, and this is an evolved evolutionary defense mechanism that has backfired on the species with human beings, particularly divers armed with explosive heads, long bottom times, and the ability to surround the local reef ecosystem, ledge, rock, or shipwreck.

Groupers are more suspicious, however. They usually will retreat to a dark section of the cave or hole in a shipwreck to watch from a shadow until the diver pops in with a light to shoot the fish. On a small live bottom section of reef, or a shipwreck, on one dive, two experienced divers can kill every single viable grouper. It is not hard, once practiced over and over. The other viable fish that get away have been hunted before and retreat by crossing over the reef to the sand, and as far away as they can, rather than going to the bottom structure.

The most efficient harvest comes from cornering all of the available fish in a local reef and harvesting them with explosive heads, multiple spears on one gun, and lift bags. This is what a good successful dive yields to a good commercial spear fisherman on scuba. Free divers, by contrast, do not have the bottom time to corner and scare several bottom-dwellers on the same reef simultaneously, given the limitations of a human holding their breath, particularly in depths past fifty feet.

MR. BELL: Mark, could we hit pause right there? We've got a lot of people in line behind you, and that is good technical detail, but maybe we could come back to you after we give some more people a chance.

MR. LABOCCETTA: Sure. Thank you for your time. I appreciate it.

MS. HARRISON: I am in North Carolina, and I have a retail market, and I would like to ask the council to be mindful of managing our fish stocks as a food source and not just a source of fun. Recreational fishing is a rich part of tradition, and it plays a large role in coastal economies, and it values a lot of money, through gear supplies and fuel and docks. However, the environmental impact of recreational fishing has gone largely unnoticed, but we're starting to see the damage that can be done through overages in the blueline tile fishery and through high discard mortality.

As climate change continues to progress, it's crucial to look at fish stocks as protein and not just a source of recreation. Food security is a pressing issue, as our global population is expected to reach ten-billion by 2050. To sustainably feed this many people, seafood will be looked to for its lower environmental footprint, because it's less carbon intensive and stable than land crops. We can see instability, due to extreme heat, across the globe this summer, from 10,000 head in Kansas to over 1.5 million cattle dying in Africa.

Commercial fishing started on the Outer Banks a long time ago, with the Algonquin Indians, and the first European settlers came to establish the first colony and were shocked to see the community of 5,000 to 10,000 residents organized and depending on local fish, and so fast-forward 450 years, and Algonquin descendants are still in the Outer Banks supplying the islands with wild-caught fish, but the trade is near collapse, and so let's talk about fair and equitable. We have sacrificed so many species for the name of fun. If we look at --

MR. BELL: Alana, you're breaking up on us. Maybe we could come back after you've got a better signal. We really can't understand anything you're saying at this point.

MR. UNGER: Good evening. My name is Chad Unger, and I'm a recreational fisherman from Naples, Florida, concerned with the red snapper fishery in the Atlantic. First, I'm opposed to Amendment 35, and I don't see this closure as a fix to the issue. I see Amendment 35 causing

bigger problems that are not being thought about. Everyone knows that closing these species has impact on other species, but, when you consider closing multiple grouper fisheries and the red snapper fishery, the impact is going to be greater than you can imagine.

This closure will not only impact the Atlantic, but it will also impact the Gulf of Mexico in a way that I don't think people realize. I currently see more fishermen from the Atlantic coast of Florida coming to the Gulf coast during the Gulf red snapper fishing season that we have here more than ever. I am not complaining about this, as I invite everyone to enjoy the awesome fishery that we do have, but I am just saying that this Atlantic closure is going to force more fishermen and women to travel to the west coast of Florida more often to fish for the closed fish that the Atlantic has.

Here in the Gulf, we have our own issues with closures and fishery management, and we do not need to impact our Gulf fisheries any more than they already are, and so I ask that, before you make any decisions, talk to the Gulf Council, compare data, find the impact your closure is going to have on the Gulf and the Atlantic red snapper and grouper fisheries, but also the commercial and charter businesses in the Gulf that are going to be impacted by this, also.

If you don't think this will happen, I will remind everyone of what happened during COVID when the City of Miami closed its boat ramps and beaches. All those Miami residents fled to southwest Florida beaches and boat ramps, and the impact was not great. The same thing will happen if you close these species like you have proposed, and so, in the eyes of the South Atlantic Council, you are fixing the problem on your property, but you're going to cause a bigger impact on your neighbor's property. Thank you.

MR. REYNOLDS: My name is Jon Reynolds, and you guys know me. I'm the Dolphin Wahoo AP Vice Chair. I'm a twenty-four-year professional career fisherman, and I've been engaged in every sector, and I'm also the president of South Atlantic Fishing Environmentalists.

At our most recent AP meeting, it was the unanimous consensus of all members, from all states and all sectors, that we definitely have a problem with dolphin. The data shows it. You know, this far, the council has delayed any actions that have been necessary to remedy this problem with largest economic recreational fishermen on the Atlantic coast. As I listen to this red snapper debate, I can't help but think, as most others do, that dolphin is next, and what a tragedy this would be, if we had to have some sort of closure on dolphin. I mean, the stock is at its lowest point, and something needs to get done.

I can tell you that my business is completely reliant upon this fishery recovering, and quite the opposite is true for a grocery store that carries an average of 39,500 items in their inventory. As my Michigan clients fly in to fish and target dolphin, staying in resorts, frequenting multiple restaurants, they leave behind, quote, unquote, Florida-caught mahi at their grocery stores, and this is absurd. The lack of a size limit in all states is also not only unfair and inequitable, but a lack of conservation-minded management at its core.

We stand with the other twenty-five large corporations, and thousands of individuals, that support a common solution to pass new sustainable measures of ten fish per person and thirty per vessel in the recreational sector, a twenty-inch size limit from Florida to Maine, and a 2,000-pound commercial trip limit to end the targeted pelagic longline effort on dolphin.

We hope this council can recognize how important this fishery is to the recreational sector, to all the charter boats, and every other industry that is completely reliant upon this and also understand that their lack of action is causing further distrust, and we hope that we can move forward with some new, sustainable regulations soon. I'm sure that I will see you guys at an upcoming meeting. Thank you for your service, and have a great night.

MS. HARRISON: I just wanted to finish, and I don't know what you heard, but, going off what the last gentleman said about mahi, is that's collapsed, and American businesses have had to turn to imported mahi to supply markets and restaurants, or not even offer it, like I do, and so now that is happening with grouper, and I will give you some perspective. Wholesale Indonesian grouper is \$7.50 a pound filleted and delivered, and my wholesale local snowy grouper is coming in at \$30.00 a pound, wholesale, filleted, and so most people have opted to take the cheaper imported option, because they have been forced out of the local fish option, because of basic economics.

Supply has gone down so far, but demand has continued to rise, and the price continues to rise, and so, unfortunately, everybody but the passionate have been priced out, from fishermen to restaurants, and it's ironic to me, because we face closures in the pelagic longline fishery for a windfarm off of North Carolina, to lower the effects of climate change, but a climate-friendly food source that we're losing as sacrifice.

The ocean provides the cleanest protein, and, by eating seafood, we can lower our carbon footprint, and imported seafood not only expands our carbon footprint, but it takes a vital food source away from the developing countries who produce it, and so that's just one reason why it's important to protect our domestic food source, because imported seafood is not a sustainable solution to reallocation, and I think, personally, there are some things that are so culturally important to a region that they do deserve to be protected.

Snapper and grouper has become one of those things that the South Atlantic, and especially in our area, and people come here just for snowy grouper, and that is amazing, and it blows my mind, but people love it so much, and it deserves to be protected for them. Thank you for letting me continue my comment.

MR. LABOCCETTA: Once again, thank you very much for your time. This just means a lot to me, and I just like to get my points across every few months in these meetings, from seeing this stuff underwater for the last twenty-five years. The last point that I just wanted to make was a comparison and effort between the yield of a commercial hook-and-line fisherman targeted grouper and snapper in the complex.

A commercial hook-and-line operator moves around to multiple spots, because it is in their best interest. The same fish as the commercial spear fishermen target have an ebb and a flow of feeding cycles and other environmental factors out of the fishermen's control. When enough fish are caught, typically they get scared and the bite stops, and very large individuals can hang up and break even the most experienced fishermen in the reef for the structure, or simply the tide changes and the fishing vessel has to reposition its drift and anchor to try to reconfigure its vessel position over the fish school.

This is the difference. The diver on the bottom with scuba apparatus has an accurate visual of the movements of the fish schools' behavior and escape plan, and they don't have to reposition or leave. They can immediately target the largest unsuspecting fish. By contrast, when the fish stop biting, the fishermen are forced to give the fish a break and move on. This is a fundamental difference. The pressure stops to fishing, while, for commercial spearfishing, it never abates. Thank you for allowing me to make that comment to the committee.

MR. REYNOLDS: Thanks for an opportunity to speak again, and it just -- I almost had to comment on the commercial spearfishing thing, and we see the same thing. The snapper grouper complex, specifically, is where the largest challenge is, and, as a hook-and-line commercial fisherman my whole life, I know, from what we've seen, especially in the Florida Keys, with the close access to the reef and the shallow water, that these slow-growing species, like grouper, are trying to make it in, and there's been some really good closures, and we've seen some good recoveries with the council has done.

I mean, it's really been amazing, but it cannot sustain and take that pressure, with the objective of killing that many groupers, to have a successful day, and groupers are already struggling as it is, and so the basic bottom line of that is that the way that the groupers were sustaining for so long was those larger fish were holding down the stock, I mean, and most of those larger fish that you would hook on hook-and-line, you just couldn't land them, and so, you know, naturally, the stock would sustain, with the larger breeding stock surviving, but, with a spear gun, those larger breeding stock, that is completely necessary to continue to sustain this stock, are dying now, at a very fast rate.

There's a lot more pressure, and the demand continues to grow, and so it is a really big problem, and I just wanted to reiterate on that, and I heard the other guy's comments, and they're pretty spot-on, I mean from what we see down here and the way that fishery is being prosecuted and the decline, especially in black groupers that we're seeing, especially with new science showing that a lot of the species isn't even really switching sex, you know, until an age that we -- An age that we didn't even realize, and so, you know, we have the size limit at twenty-four now, and, you know, we might need some sort of slot, or something needs to be done about these shallow-water groupers, if they're going to make it. Thank you very much, and thanks for giving me another opportunity, and I know it's been a long time and a long night for you guys. Thank you.

(Whereupon, the public comment session was adjourned.)

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