

# Summary of Scoping Comments on Snapper Grouper Vision Blueprint Regulatory Amendment 26 (Recreational Management Measures)

Below is a summary of comments that were received during the scoping webinar and scoping hearings held from January 23<sup>rd</sup> through February 8<sup>th</sup> followed by a summary of written comments received via the online comment form on the Council's website or other means such as by mail, fax, or email. In total, there were 36 comments provided during the public comment period that ended on February 10<sup>th</sup>.

**Scoping Webinar:** There were 17 attendees for the scoping webinar that took place on January 12, 2017. Links to transcripts of the public comments are found near the bottom of the SAFMC Briefing Book webpage ([link to BB Page](#)). Two people offered the comments summarized below:

- Aggregate limits are really confusing to a lot of recreational fishermen.
- Consider decreasing the 20-fish aggregate to fifteen.
- Retain the minimum size limit for silk, queen, and blackfin snappers at twelve inches.
- Lower the recreational minimum size limit of black sea bass to 12 inches.
- Rolling seasonal closures make sense for North Carolina, certainly in February or March or even parts of April.
- Disagree with including vermilion snapper in the ten-snapper aggregate.

**Scoping Hearings:** A total of 233 people attended the in-person hearings and 17 provided comments on Vision Blueprint Amendment 26 while at the meetings. Links to transcripts of the public comments are found near the bottom of the SAFMC Briefing Book webpage ([link to BB Page](#)).

Jacksonville, FL, scoping hearing (1/23): 59 attended. Of the attendees, 5 identified themselves as commercial, 36 recreational, 3 for-hire, 4 commercial/for-hire, 3 commercial/recreational, 2 recreational/for-hire, 1 commercial/recreational/for-hire, 1 recreational/other, and 4 other. There were no comments pertaining to proposed actions in Vision Blueprint Regulatory Amendment 26.

Cocoa Beach, FL, scoping hearing (1/24): 58 attended. Of the attendees, 12 identified themselves as commercial, 19 recreational, 5 for-hire, 10 commercial/for-hire, 1 commercial/recreational, 2 recreational/for-hire, 4 commercial/recreational/for-hire, 1 NGO, and 5 other. Three people offered the comments summarized below:

- Consider lowering the recreational minimum size limit of black sea bass to 11 inches, equal to the commercial.
- Triggerfish -- reduce the size limit to minimize discards.

Stuart, FL, scoping hearing (1/25): 10 attended. Of the attendees, 2 identified themselves as commercial, 3 recreational, 1 NGO, and 4 other. No comments were offered regarding Vision Blueprint Amendment 26.

Key Largo, FL, scoping hearing (1/26): 20 attended. Of the attendees, 1 identified themselves as commercial, 7 recreational, 5 for-hire, 3 commercial/recreational/for-hire and 4 other. No comments were offered regarding Vision Blueprint Amendment 26.

Murrells Inlet, SC scoping hearing (1/30): 16 attended. Of the attendees, 7 identified themselves as recreational, 4 for-hire, 1 NGO, and 4 other. 1 person offered the comments summarized below:

- Support for establishing a deepwater species aggregate bag limit, but no season.
- Aggregate deepwater species bag limit should be three, with existing restriction for snowy grouper.
- Support establishing a 3-fish aggregate bag limit for shallow-water grouper.
- Retain the twenty-fish aggregate limit as is.
- Consider taking no action on modifying or removing the shallow water grouper closure.
- Support a modification on the recreational minimum size limit for black sea bass, but evaluate effects on season length. Evaluate the effects of an 11-inch minimum size limit for both sectors.
- Support for a twelve-inch, region-wide, recreational minimum size limit for gray triggerfish.

North Charleston, SC scoping hearing (1/31): 21 attended. Of the attendees, 4 identified themselves as recreational, 5 for-hire, 3 commercial/for-hire, 3 NGOs, and 5 other. No comments were offered regarding Vision Blueprint Amendment 26.

Richmond Hill, GA public hearing (2/1): 14 attended. Of the attendees, 6 identified themselves as recreational, 3 charter, 2 for-hire/other, and 3 other. Three people offered the comments summarized below the following comments:

- Support for lowering the minimum size limit for black sea bass to twelve inches. It would also be OK to lower to 11 inches to match the commercial size limit. The main concern is to keep the fishery open year-round.
- Support for recreational minimum size limit for black sea bass of 11 inches. This would significantly reduce discards.
- Leave vermilion snapper out of the recreational 10-snapper aggregate.
- Remove the shallow-water grouper closure off Georgia. Fishermen are not seeing shallow-water grouper during these months, but this would simplify regulations.

Wilmington, NC public hearing (2/6): 9 attended. Of the attendees, 4 identified themselves as recreational and 6 other. Two people offered the comments summarized below:

- The shallow-water grouper spawning season closure:
  - Should correspond to when the fish are spawning in the various areas of the coast. Some of the shallow-water groupers in North Carolina are not in spawning condition during the closure.

- Consider extending into May or June for scamp and red grouper to eliminate take during their spawning because these stocks appear to be suffering.
- Gag grouper - recreational fishermen have not been participating adequately in that fishery when compared to the commercial sector. Increase the recreational bag limit to two fish.
- Revise the bag limit for red grouper, scamp, and gag grouper by reducing the aggregate to two fish.
- Black sea bass - keep the recreational size limit in federal waters at 13 inches, but increase the commercial size to match the recreational. Lowering the size limit will be counterproductive in the long run. It will reduce the biomass for spawning and future stock assessments. If the minimum size is reduced to less than thirteen inches, then the bag limit will need to be adjusted to three or two fish per person, and nobody is going to like that.
- Gray triggerfish - increase the minimum size to fourteen inches for all the South Atlantic.
- A twenty-fish limit for gray triggerfish should be part of the reef fish limit of twenty fish per day, and the ten snapper bag limit should also be part of the twenty-fish limit.
- The ten-fish aggregate should specify that no more than five fish can be of any one species.
- Deepwater species - remove the size limits and manage by fishing season, bag limits, and ACLs, and require the use of single-hook rigs beyond 240 feet.

Hatteras, NC public hearing (2/7): 11 attended. Of the attendees, 1 identified themselves as commercial, 2 commercial/recreational, 1 commercial/charter, 1 commercial/recreational/charter, 1 commercial/recreational/charter/other, recreational, 1 charter, 1 charter/recreational, 1 recreational, and 2 other. Two people offered the comments summarized below:

- The recreational minimum size limit on black sea bass should be lowered to 12 inches or lower.
- Gray triggerfish and almaco jack – support for individual limits instead of being in the aggregate group. There is concern about ACLs being reached early for these species due to liberal bag limits. One suggested 10 triggerfish per person per day.

Other comments:

- Support for regional management: Florida and Georgia one region and Carolinas another.

Atlantic Beach, NC public hearing (2/8): 15 attended. Of the attendees, 2 identified themselves as commercial, 3 commercial/charter, 1 commercial/recreational, 1 commercial/recreational/charter, 1 charter, 1 recreational, 1 non-governmental organization, and 5 other. Two people offered the comments summarized below:

- Support for lowering the minimum size limit to 12 inches
- Support for making the size limit the same for both sectors.
- Lower bag limit on gray triggerfish to ten per person on the recreational sector and increase the bag limit on vermilion to a similar level (maybe 7) since those species are caught together.

Other comments:

- The commercial trip limit for black sea bass should be the same for both pot and hook-and-line gear.



### **Summary of Written Comments (submitted online, via mail, or email):**

Seventeen comments were received online ([online comment forum](#)) including three written comment letters.

#### **Comments on aggregate bag limits:**

- Do not change the 10 snapper aggregate limit or the 20 fish aggregate.
- The 1-fish/vessel limit on snowy grouper is causing excessive discards. Consider a limit of 50 lbs.
- Bag limits for triggerfish, spadefish, vermilion, jacks, and sailor's choice should not be changed.
- Targeting golden tilefish from January through April contributes to discards of blueline tilefish and snowy grouper (on a typical deep drop fishing trip at least 10 snowy groupers and 25 blueline tilefish are caught for each golden tilefish). Seasons should be aligned.
- Allow retention of one red snapper or one grouper. The two species feed on the same prey at the same depths and this option would result in less discards.
- Establish a 10 fish aggregate bag limit for deepwater species.
- Suggestions of 5-fish and 3-fish aggregate bag limit for shallow-water groupers. Consider 2 gags within the shallow-water grouper aggregate.
- Establish a year-round 3-fish aggregate bag limit for deepwater species including: snowy grouper, yellowedge grouper, misty grouper, queen snapper, blackfin snapper, silk snapper, golden tilefish, blueline tilefish, and sand tilefish. Keep current restrictions in place for golden tilefish, snowy grouper, and blueline tilefish.
- Adjust the grouper aggregate to allow no more than 2 snowy grouper or 2 golden tilefish.
- The grouper aggregate should remain at 3 fish but should only include 1 fish per species.
- Suggest individual bag limits for gray triggerfish and spadefish (10 per person for each), and vermilion (8-10 per person).
- Remove spadefish out of any aggregate, as only 4% of ACL was caught.
- For deepwater species, a two-fish limit would be more appropriate as few anglers are able to target multiple deepwater species concurrently. Require descending devices for deepwater species.
- Current deepwater species seasons should be adjusted to Feb 1st - September 1st for the recreational sector and maintain current bag limits.
- Adjusting aggregate bag limits to reflect harvest depth instead of species composition. This would simplify regulations and maximize species conservation by reducing discards.
- Deepwater species: consider a 3-bag aggregate of 1 each, maximum of 2 golden tilefish and snowy grouper.
- Modify the 20-fish aggregate to also include species in the current 10-snapper aggregate with: Triggerfish - 10, Jacks - 20, Spadefish - 10, and Vermillion - 10.

#### **Comments on shallow water grouper closure:**

- Most commenters supported retaining the shallow water grouper closure as is.
- Some commenters supported prohibiting recreational harvest of shallow-water grouper species annually but adjust the closure by area.
- Do not make changes to the shallow-water grouper closure until there is scientific evidence to warrant a change.

- The shallow-water grouper closure from Jan 1- April 30 is the only sensible fishery management action happening right now. It should remain unchanged for both sectors. The closure should not be adjusted by area and should remain in effect for the entire South Atlantic area. No adjustment is need for Black grouper. Creating a separate system for blacks will make things even more complicated.
- Consider a rolling 8-10 week shallow-water grouper closure.
- Leave the shallow-water grouper closed for the time they are spawning, which is typically a single moon cycle not four months. There is also data that support the closure by specific zones for these spawning cycles (30-60 days) not 120 days.
- Remove red grouper from the current closure as they spawn on the Nov and Dec moon cycles (Florida) and have already dispersed from aggregating sites.
- Red grouper are spawning and full of eggs in April and May off the NC coast. Allow harvest during the winter when it is currently closed and suggest a spawning season closure in April and May.
- Adjust the shallow-water grouper closure to better reflect the spawning seasons in each state would increase harvest opportunities. However, additional review of this option is necessary to determine whether the resulting increase in landings would impact the ACL or cause seasonal closures due to quota overages.

Comments deepwater species minimum size limits:

- Strong support for removing minimum size limits for deepwater species to minimize discards.

Comments on black sea bass minimum size limit:

- Strong support for reducing the recreational minimum size limit to reduce discards. Most supported a reduction to 12 inches and some supported a reduction to 11 inches to match the commercial minimum size limit.
- Some support for retaining recreational minimum size limit at 13 inches and modifying the commercial to match.

Comments on gray triggerfish minimum size limit:

- Decrease the recreational minimum size limit for gray triggerfish in Federal waters off the east coast of Florida to 12”.
- Do not change the minimum size limit for gray triggerfish.

Other comments:

- Require descending devices for all fishermen.
- Use daily catch limit approach based on number of fishermen and number of daily trips and implement spawning season closures.
- Implement mandatory reporting for all fishermen and conduct strict enforcement.
- Regulate type of equipment that is allowed for deepwater species in the recreational fishery.
- To avoid stakeholder overload, suggest that the Council address deepwater species issues and shallow-water grouper issues in separate amendments going forward.
- Too much of the banded rudderfish ACL is allocated to the recreational sector.

To: South Atlantic Fishery Management Council

February 9, 2017

Re: Vision Blueprint Recreational Amendment 26 Comments

**Shallow Water Grouper –**

- a) Our grouper stocks are suffering and have not rebounded with the 4-month closure and reduced bag limits and ACL's from Amendment 16. Therefore, we should not consider making any changes that will increase mortality on these species. In addition to the 4-month closure we should consider extending this closure time into May or June for Scamp and Red grouper (which appear to be really suffering) to help these stocks and to eliminate take during their spawning which extends past May 1 in some areas (SC & NC & others?).
- b) Revise the bag limit for red grouper, scamp, and gag grouper by reducing the aggregate to 2 fish period but allow the 2 to be of any species combination

**Black Sea Bass –** If 92 % of the recreational landings are discarded then there is a problem with the fishery not the size limits. How many of these discards are by head boats (charter boats too) that frequent the same area too frequently? How many discards are from fishing an area that was just "cleaned out" by BSB pots that removed most every fish that was larger than 11"? The current mesh size on the BSB pots has been documented to be too small so it also is impacting the recreational sectors ability to land legal sized BSB.

- a) Keep the recreational minimum size limit for black sea bass in Federal waters of the South Atlantic Region at 13" and increase the commercial size limit to match the recreational. Lowering the size limit will be counterproductive in the long run.
- b) Lowering the recreational size limit will increase landings the first year then subsequent years will suffer by decreased reproduction.
- c) Reduce bag limit back to 5 fish per person -It makes no sense whatsoever to increase the bag limit from 5 to 7 when the majority of the fishermen can't land 5 fish.
- d) If the minimum size is reduced to less than 13" than the bag limit will need to be adjusted to 3 or 2 fish per person to allow enough spawning size BSB to remain in the population for sufficient spawning for MSY and OY.
- e) Reducing the size limit would also cause the season to close as soon as the ACL is met – past preferences were to have a larger minimum size and at least a five fish limit and to have a year round fishery.

**Gray Trigger Fish –**

- a) Increase minimum size to 14" FL for all of South Atlantic – 12" FL is too small for MSY and OY. 12" is a small fish with a low yield – let them grow up and spawn before harvest.
- b) **20 fish limit** - Gray Trigger Fish limit should be counted as part of the reef fish limit of 20 fish per day and the 10 snapper bag limit should also be part of the 20 fish limit. This will make law enforcement and understanding the regulations much easier. Recreational fishermen do not need to take home more than a total of 20 fish per person.
- c) For both the 20 fish aggregates, specify that the species with individual limits (beeliners, BSB, etc) they must be part of the 20 fish aggregate – not separate. Also that no more than 5 fish can be of any one species.

**Deep Water Species –**

- a) Remove size limits for deepwater species – manage by fishing season, bag limits, and ACL's
- b) Require use of single-hook rigs only for the deepwater species beyond 240 feet.

Sincerely,

Jim Attack



February 10, 2017

Gregg Waugh  
Executive Director  
SAFMC  
4055 Faber Place Drive, Suite 201  
N. Charleston, SC 29405

Dear Director Waugh:

The American Sportfishing Association appreciates the opportunity to provide comments on the Snapper Grouper Amendment 44, Snapper Grouper Amendment 43, and Vision Blueprint Recreational Regulatory Amendment 26.

For Snapper Grouper Amendment 44 (Yellowtail), the American Sportfishing Association supports Action 1, Alternative 1 (no action). If the Council moves forward with a combined ABC/ACL, it should maintain separate commercial and recreational allocations as proposed under Action 1, Alternative 2. For Action 2, we support Alternative 1 (no action). If quota transfers are considered by the Council, they should only be done on a temporary basis and hold the recreational sector harmless should it exceed its quota when sharing with the commercial sector. This position is most similar to Action 2, Alternative 5. In general, we have continued concerns that quota transfers continue to be considered only on a one-way street from recreational to commercial, particularly when the goals of each sector are so dramatically different. The only goal of the commercial sector is to harvest fish, while the goal of the recreational sector is primarily to experience an encounter with a fish. Harvest may or may not occur by an angler, and more fish in the water results in more encounters. If quota is continually transferred away from the recreational sector, encounters will decrease and over time, opportunities will be lost.

The continued closure of the red snapper fishery in the South Atlantic is frustrating for all and the American Sportfishing Association appreciates the Council's efforts to look for ways to reopen the season in some capacity. However, it seems that with a wide variety of options on the table in Snapper Grouper Amendment 43, the Council should start with small steps first like improving available data, using descending devices, and traditional management measures before considering more extreme measures like large scale closures, especially when those closures would disproportionately affect Florida. Closing areas to fishing should only be considered as a last resort when all other options have been tried and failed. In addition, no quantitative information has been provided by the Council on the size and scope of these proposed closures or what the potential tradeoffs and benefits would be. What size, location and duration closures would be considered? How long would the resulting red snapper season be? These answers are needed before the public or the Council can determine whether implementing any additional regulations and restrictions would justify a limited red snapper season.

AMERICAN SPORTFISHING ASSOCIATION

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The American Sportfishing Association supports the efforts of the Council through Vision Blueprint Recreational Regulatory Amendment 26 and the desire to streamline regulations and provide better use of the resource. Adjusting aggregate bag limits to reflect harvest depth instead of species composition would simplify regulations and maximize species conservation by reducing discards. Adjusting the shallow water grouper closure to better reflect the spawning seasons in each state would increase harvest opportunities. However, additional review of this option is necessary to determine whether the resulting increase in landings would impact the ACL or cause seasonal closures due to quota overages. We support the removal of size limits for deepwater species if there is a corresponding reduction in discards and similarly support a decrease in the recreational minimum size limits for black sea bass if there is a significant reduction in discard numbers.

Thank you for your consideration of our comments. We look forward to continuing to working with the Council on these issues as they move forward.

Sincerely,

Kellie Ralston  
Florida Fisheries Policy Director  
American Sportfishing Association

## **Vision Blueprint Recreational Regulatory Amendment 26 for the Snapper Grouper Fishery of the South Atlantic**

Under Public Comments:

**Proposal-** to resolve a severally over complicated process to manage South Atlantic Fisheries

**Resolution-** The South Atlantic Fisheries Management Council has a scientific approach to calculate and evaluate the proper annual catch limits for sustainability of most all the species of fish and marine life in both recreational and commercial sectors. The annual catch limits should be divided evenly among all fishermen, commercial and recreational, for instance if we have 10 times the documented South Atlantic recreational fishermen as commercial fishermen (or vise versa), the solution is simple mathematics, the annual total catch limits will be divided evenly among the number of total fishermen.

After the decided annual catch limits for the species in question, next divide the number into the documented number of daily trips made on an annual bases by the sector of fisheries, this is your daily catch limits! When the yearly total quota per sector is reached, the season is now closed for that sector until January 1<sup>st</sup> of the next year or another decided upon season start date.

If there are concerns about seasonal spawning times, the yearly season should start immediately after this documented time hence this time should be closed before the spawning time if the annual catch limits are being calculated properly.

**Enforcement and Reporting-** If at any time, any party, is caught not reporting a trip or catch the party shall have their license revoked for the rest of the physical year, after 3 occurrences licenses/permits should be revoked for a substantial time frame (3-5 years?). With this in place there should be drop box at all public ramps, all marinas, and a simple on-line reporting structure to be the same for all fishermen.

**Deep Water Species-** Any recreational fisherman that fishes in water >200 M should be able to keep what they catch with the fishing equipment that should be listed as recreational equipment, no automated retrieving devices such as electric reels, hydraulic reels, etc. as this type of equipment should be listed as commercial use only and should not be on found on any recreational craft, head boat, etc. in federal waters that is not fishing under a federal issued permit or license. There should be just a simple number of total fish per day (>10) which would also help solve the by catch issue in deep water.

**Summary-** This plan should greatly reduce the complicated process and gross expense of trying to figure catch limits and direct more energy and money towards research, documentation, and dividing the catch limits to match smaller management areas, for instance South Florida deepwater fishing within 10 miles from shore verses Georgia deep water fishing at 60+ miles from shore. The expense to fish offshore in Georgia has a greater local economic impact per fisherman. This plan should also create a greater positive economic impact on the fisheries industries in the South Atlantic Region as a whole.

Captain Randall Simons  
'Gotta Have' Fishing

## **SAFMC VISION BLUEPRINT FOR RECREATIONAL FISHING FOR AMENDMENTS 43 and 26**

My name is Charles Wilson. I am a born and raised local of Charleston, S.C. I represent a large group of people that are determined to protect the right to fish and harvest clean food from our Earth given ocean resource. There are many problems plaguing our fisheries and the ocean itself. If we can't find a way to intelligently balance the whole equation, then we are doomed.

### **Amendment 26 questions and answers**

#### **How do you think the aggregate limits should be changed?**

1. We should establish an aggregate bag limit of 3 fish. The limits for Snowy AND Golden tile should be adjusted in this bag limit. We should be allowed a max of 3 fish with no more than 2 snowys or 2 golden tiles. The tile and snowy issue is another discussion as I realize BUT very few people in South Carolina fish for either and 1 fish per boat per day while commercial has 200lbs per day is ridiculous and makes no sense. We should NOT be limited to 1 fish per boat of the whole deep water aggregate. This guarantees a focus on commercial fishing of these species while allowing the recreational sector virtually no shot at catching any fish. The recording problem is your problem to fix and the burden of your inconsistencies should not fall on us.
2. The aggregate should remain at 3 fish BUT should only include 1 fish per species. Ex 3 fish total= no more than 1 gag, 1 scamp, 1 red....etc
3. I am fine with the modification and recommendations of the 20 fish aggregate adjustments.
4. Specific limits should be decided for these fish
  - a. Triggerfish- 10 per person is PLENTY and schools are subject to overfishing
  - b. Jacks Complex- fine to remain within the 20 fish aggregate- healthy fishery
  - c. Spadefish- 10 per person is PLENTY and schools are subject to overfishing
  - d. Vermillion- 8-10 per person is a good number and the stock is healthy

#### **Shallow Water Grouper Closure**

This a VERY frustrating section to read and comment on. The big issue with all fisheries management is aiming for a healthy ecosystem. How can you possibly discuss reopening Shallow Water Groupers when you have no science? You have no science to prove or disprove the red snapper population. You have estimates calculated by computers. You absolutely have

no science or study information regarding the status of the shallow water grouper and it is impossible to close red snapper for years and not overfish the grouper in the process! Impossible. Red Snapper is another topic but completely related to this discussion.

Nov-April is the Winter for the East Coast. Far less rec fisherman fish in the winter than in the spring summer and fall. This closure adjustment and reopening will benefit the commercial sector far more than the recreational. It will also allow for the few overly greedy commercial fishermen to jump on the Rec ACL not being met and demand that we harvest all the fish, thus allocating more grouper to the commercial ACL. This is history repeating itself. Any responsible recreational fisherman will tell you right now that the grouper are being overfished but the red snapper are thick on every spot. Sounds like a no brainer to open the snapper.

Fish move and fish spawn at different times in different places. Your set "spawning zones" will never remain safe protection areas because the fish will move and adapt and fisherman will be waiting for them on all sides of the "protected spawning zone." I won't be, but your commercial and overly aggressive recreational guys will be. The shallow water grouper closure from Jan 1-April 30 is the only sensible fishery management action happening right now. It should remain unchanged. The fish stock is very low and it needs all the help it can get. Opening Red Snapper would relieve much pressure off the groupers but that makes too much sense.

1. Recreational and Commercial harvest should remain closed from Jan 1-April 30.
2. The closure should not be adjusted by area and should remain in effect for the entire South Atlantic area.
3. The closure should not be lifted in any specific areas and should remain in effect.
4. The timing should not be modified and the closure should remain in effect.
5. The closure should remain as is and then no adjustment is need for Black grouper. Creating a separate system for blacks will make things even more complicated.
6. The closure should remain as is. No change is needed.
7. The closure should remain as is. Gag needs protection for these few months everywhere.
8. The closure should remain the same!!!! This is insane. We don't need adjustments for every fish in every different location. These fish are all moving around. All of these adjustments are just making things more complex.
9. The closure should remain the same. No complicated adjustments are needed.

The main thing the council needs to consider is the logic behind a balanced ecosystem. Take the computer and the equations out of this and think rationally. The stocks of fish are all different because the closures and time frames are different. The grouper closure to protect spawning time frames needs to remain everywhere. The over abundant red snapper needs a small season or tags to allow some pressure off the grouper and gather data for your stupid computer algorithms.

## **Removal of size limits for deepwater species**

Minimum size limits make much more sense for shallow water fish than deep water fish. Removing the size limits for queen snapper, silk snapper, and blackfin snapper would eliminate undersized fish and dead discards. Any action to eliminate waste and loss of fish makes sense. I agree to remove the size limits on those fish.

## **Minimum size for black sea bass**

The number of black sea bass discards is very high. Reducing the minimum size limit to 11 inches would reduce the number of discards and help the fishery. I think that changing the minimum is a good decision.

## **Minimum Size for Triggerfish**

Once considered a “trash” fish by many, triggerfish is now very sought after. I commented above regarding the number of fish per day. 10 fish per person is plenty and will help with a healthier, bigger stock of fish. The minimum size limit should not be reduced. A triggerfish under 12in has very little meat on it anyhow. There is no need to reduce the size limit. Reduce the bag limit to 10 fish and there will be many big fish out there. No responsible angler would prefer to catch a 12 in triggerfish over a 20 in trigger. This is a no brainer.

## **Amendment 43 questions and answers**

### **What are the potential ways to reduce the number of discarded red snapper?**

There are 2 major ways to reduce the number of discarded snapper.

1. Take your computer equations and estimates out of the decision-making process and use real science and real current data from actual fisherman, allow some type of tag, permit, or small open season to allow for the harvest of these fish.

2. Don't fish areas that have red snapper. As this ridiculous and poorly calculated closure continues, the population will grow more and more. It will become harder and harder to go fishing and not catch a red snapper. It will become impossible to not catch snapper.....because after all, you have no control over what fish bites your hook!

This question honestly just seems ridiculous to even ask

**What are the management measures that could improve the survival of discarded red snapper?**

1. The most reasonable measure is to allow a very limited harvest of red snapper. Allowing 30,000 fish between the commercial and recreational sectors is a very small number in itself. How many shallow water grouper are being caught between the rec and comm sectors right now? The red snapper travel and live in far bigger schools than the groupers yet we are continuing to overfish the grouper while the snapper population thrives. We could easily be allowed 2 fish per person per year or season and that would make far more sense than shutting the whole fishery down for "lack of stock."!!!!
2. NOAA and or SAFMC needs to define and promote the descending device of choice. There is ZERO reason that both groups do not already have sufficient data and information regarding descending devices and the preferred product for ensuring healthy fish.
3. Create a federal saltwater offshore fishing license. Use that money to fund any additional needed studies. Require anyone with that license to use the endorsed descending device for the release of all fish. Require an education system within this license to promote responsible fishing and fish handling. Very simple concepts here people.
4. Promoting slow ascending of these caught fish could help. As fishermen, we often want the intense fight of bringing a fish up from depths quickly but this quick depth change is what causes the need for a descending device or venting the fish to help it live. Again, if there is some promoted education on this it would help the many ignorant people.

**What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed?**

If a limited red snapper season is allowed, a tag program by some type of identification system would be most beneficial. The chosen identification system could require use of a phone APP, a mail in form, a visit to weigh/data station, or etc.

I think a great way to reward people with an open season in the future would be to have a tagging program right now for the snapper. Don Hammond has a Mahi tagging program to learn about the mahi. If you really want to gather information and data on snapper, then tagging them is the best option. People could be tagging and releasing 10 fish per trip or more right now. You could have a plethora of data and then reward the people who tagged "X" number of fish with real harvest tags. Fisherman will appreciate the involvement of the program on both ends. Fisherman don't feel any positivity or education towards the snapper situation and promoting that would help moral and ultimately achieve goals for the SAFMC and for the rec fisherman.

I think the SAFMC should allow each state to manage their red snapper and then collect the data through a state organized system. Every state is different with different time and geographical constraints so let the state decide what will work best for them within the given criteria of the SAFMC. States lead the charge and then have the information organized for SAFMC or whomever.

**What are the best ways to improve the estimates of catch, discards, and effort in the private recreational snapper grouper fishery?**

Key here is to take ESTIMATES out of the equation and use FACT

This question can be grouped in with the above. Have a snapper recording APP for the phone or have a system run through each state, allowing the state to determine what will work best for their particular system of infrastructure and geography. We need an education and awareness system and the APP or decided program should be as involved and educating as necessary without being overcomplicated.

You could hire a third-party business or a nonprofit to assist in the organization of this information. Get colleges involved and use science and research students to help with data collection at boat landings and etc. An offshore saltwater fishing license would really help narrow down who to call for phone surveys and etc. The number of relevant offshore fisherman that receive phone call surveys or mail in survey is very small and there are several ways you could change this.

**You, The SAFMC, must want to make these changes! We are waiting!**



# Habitat Discussion

We need more habitat. We need more habitat. We need more habitat!!!

It makes zero sense to continue spending money to regulate our limited resource without spending equal or MORE money on building more reefs and habitat. The South Atlantic has a very limited number of reefs, wrecks, and additional habitat. There are millions of miles of sandy bottom just waiting to be repurposed as new habitat. We know what types of habitat specific fish need, yet we continue to regulate the few areas they have to live and spawn in. What happened to the S.C. Artificial Reef program? Lots of excuses is what happened. We need more habitat. Ways to create and deploy more habitat needs to be discussed every year at every single meeting. From concrete to cars to train cars to ships to rocks etc. We have millions of reefs sitting around the eastern US as trash piles. We need to turn all of it into reefs. We need new habitat and new growth and new life. If we aren't creating new life, we are dying. We must continue to evolve in every way in order to survive as a disgusting species on this planet. This is truth. Please make changes to habitat policy. I am not warmed up yet and I will not stop until this changes.