Summary of Public Comments on Snapper Grouper Amendment 43 (Red Snapper and Recreational Reporting)

Below is a summary of comments that were received at the listening stations and public hearings held from January 23rd through February 8th. The summary also includes 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 144 comments for Amendment 43 provided during the public comment period that ended on February 10th. Of these comments, 69 were submitted verbally and 77 were submitted in writing.

For the listening stations and public hearings, there were 242 attendees and 37 commented verbally while at the meeting. Of the attendees, 24 identified themselves as commercial, 2 commercial/recreational/charter/other, 18 commercial/charter, 14 commercial/ charter/ recreational, 7 commercial/recreational, 25 charter, 7 charter/recreational, 1 charter/recreational/other, 91 recreational, 2 recreational/other, 8 non-governmental organization, and 41 other. Links to transcripts of the public comments are found near the bottom of the SAFMC Briefing Book webpage (link to BB Page).

Listening Stations and Public Hearings:

Key West, FL listening station (1/18): 5 attended and 3 commented. Of the attendees, 2 identified themselves as recreational and 3 for-hire. Of the 3 comments received, 0 commented on Snapper Grouper Amendment 43.

Marathon, FL listening station (1/19): 3 attended and 2 commented. Of the attendees, 1 identified themselves as commercial, 1 recreational, and 1 "All". Of the 2 comments received, 0 commented on Snapper Grouper Amendment 43.

Jacksonville, FL public hearing (1/23): 59 attended and 20 commented. 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. Of the 20 comments received, 18 commented on Snapper Grouper Amendment 43.

- Several fishermen commented that they did not believe the catch and discard estimates and discard mortality values.
- Some fishermen commented that red snapper population was so large that they were impacting other populations.
- Some fishermen thought there was a conspiracy to keep the red snapper fishery closed.
- Some fishermen thought this was another way to create new marine protected areas.
- One fisherman wanted Florida to manage the offshore fisheries.

- Some fishermen suggested improving education on safe releases. Dehooking, venting, and descending devices were mentioned.
- If a red snapper season is allowed, have it after the spawning season.
- One fisherman suggested close bottom fishing around the full moon to reduce interactions with potentially spawning red snapper.
- Several fishermen suggested that artificial reefs have been beneficial for the red snapper population off Jacksonville
- Some fishermen suggested a slot limit
- Some fishermen suggested a requirement to report for private recreational fishermen.
- One fisherman suggested charter boat operators would prefer no closed seasons or areas over being able to possess a red snapper.
- Some fishermen suggested commercial fishermen can avoid areas with red snapper.
- One fisherman suggested a prolonged closure in depths greater than 100 feet was unacceptable.
- Several fishermen suggested not doing anything additional since the population has grown.
- Several fishermen suggested that the Council improve the way economics is incorporated into our analyses.
- One fisherman suggested allowing harvest one day per month and having increased sampling during that time.

In addition to the statements on the record, there were questions on the reliability of the data used to estimate red snapper catch and discards. They also questioned the value of discard mortality. One fisherman polled the group in the room to see who was in favor of a stamp and reporting requirement for red snapper/snapper grouper fishing. Most were in favor with a few adamantly opposed. The fishermen all indicated the population was doing much better than the model was seeing. They were seeing more and larger fish than had been seen in the past. One fisherman indicated there was a dive study that could be used to calculate red snapper abundance. Several fishermen indicated that red snapper were overrunning all the reefs and it was becoming difficult to catch other fish including pelagic fish while trolling.

Cocoa Beach, FL public hearing (1/24): 58 attended and 16 commented. 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. Of the 16 comments received, 16 commented on Snapper Grouper Amendment 43.

- Some fishermen suggested a stamp or certificate program for red snapper.
- Several fishermen indicated the stock is healthy.
- One fisherman suggested the recruitment was coming from Campeche Banks.
- Several fishermen suggested red snapper should be open.
- Several fishermen suggested outreach to recommend moving from red snapper area after catching their limit (if a season was allowed).
- Several fishermen suggested improving the science on red snapper.
- Some fishermen suggested using fishermen to collect data needed to support what they are seeing.

- One fisherman suggested commercial fishermen have developed fishing methods to avoid red snapper.
- Some fishermen were against any new closed areas to manage the red snapper discard problem.
- One fisherman suggested limiting the number of charter boats to limit pressure on red snapper.
- Some fishermen suggested allowing harvest to enable data collection.
- Some fishermen suggested that other fish cannot be caught because the abundance of red snapper is so high.

In addition to the statements on the record, there were questions on the reliability of the data used to estimate red snapper catch and discards. They also questioned the value of discard mortality. There was some discussion on recreational reporting with most being in favor and some opposed viewing it as an additional tax.

Stuart, FL public hearing (1/25): 10 attended and 2 commented. Of the attendees, identified themselves as 2 commercial, 3 recreational, 1 NGO, and 4 other. Of the 2 comments received, 1 commented on Snapper Grouper Amendment 43.

- One fisherman commented that descending devices decrease discard mortality to 10% or less for red snapper.

Discussion at the meeting focused on the studies to estimate discard mortality.

Key Largo, FL public hearing (1/26): 20 attended and 11 commented. Of the attendees, 1 identified themselves as commercial, 7 recreational, 5 for-hire, 3 commercial/recreational/for-hire and 4 other. Of the 11 comments received, 5 commented on Snapper Grouper Amendment 43.

- Some fishermen encouraged the use of descending devices.
- Some thought citizen science could be used to improve data collection on red snapper.
- Some fishermen commented on venting tools could be used on headboats to improve survival.
- Some fishermen suggested red snapper are an important fish and could make a positive trip for fishermen.
- One fisherman recommended limiting the number of hooks to the bag limit to prevent discards.
- One fisherman recommended five red snapper per commercial vessel and two red snapper on charter trips.
- One fisherman suggested using a fishing tournament to collect data on red snapper.

Murrells Inlet, SC public hearing (1/30): 16 attended and 1 commented. Of the attendees, 6 identified themselves as recreational, 1 commercial/recreational/charter, 2 non-governmental organization, 1 charter, 1 commercial/recreational/charter/other, 1 recreational/other, and 4 other. The 1 comment received commented on Snapper Grouper Amendment 43.

- Recommended use of descending devices to help reduce red snapper discards.
- Supported efforts to develop recreational reporting apps for red snapper.

In addition to the statements on the record, there were questions on the reliability of the data used to estimate red snapper catch and discards. They also questioned the value of discard mortality.

North Charleston, SC public hearing (1/31): 21 attended and 3 commented. Of the attendees, 5 identified themselves as recreational, 3 charter, 1 recreational/charter, 1 recreational/charter/other, 3 commercial/recreational/charter, 3 non-governmental organization, and 5 other. Of the 3 comments received, 3 commented on Snapper Grouper Amendment 43.

- One commented on a requirement for a free educational certificate or program that, once completed, allows an angler to participate in a mini-season.
- All three commented on improving recreational data.
    - Improve reporting for the private recreational anglers and include for-hire trips. It could include information on disposition
    - Develop some type of digital reporting for private recreational anglers.
    - Data need to be improved so that a season could be opened in the future.
- The closure has helped to increase the number of juvenile red snapper.
- Most commenters did not believe the catch and discard numbers.

In addition to the statements on the record, there were questions on the reliability of the data used to estimate red snapper catch and discards. They also questioned the value of discard mortality.

Richmond Hill, GA public hearing (2/1): 14 attended and 3 commented. Of the attendees, 3 identified themselves as charter, 1 recreational/charter, 6 recreational, 1 commercial/recreational/charter, and 3 other. Of the 3 comments received, 3 commented on Snapper Grouper Amendment 43.

- One commenter was in favor of electronic logbooks for recreational sector. Report on catch, discards, and support use of descending device.
- One commenter suggested a 6-month closure in 100-plus foot water in northeast portion of Florida.
- One commenter suggested a 6 month season for red snapper off Georgia with 1 fish size limit.
- Some commenters indicated the bycatch issue seems to be off Florida.
- Most commenters did not believe the catch and discard numbers.

Wilmington, NC public hearing (2/6): 9 attended and 2 commented. Of the attendees, 4 identified themselves as recreational and 6 other. Of the 2 comments received, 1 commented on Snapper Grouper Amendment 43.

- The estimate of biomass is not accurate.

In addition to the statements on the record, fishermen questioned the catch and discards estimates. Some were in favor of recreational reporting and some did not want to pay additional

taxes for recreational fishing. There was discussion about how to improve data (including size) for private recreational fisheries.

Hatteras, NC public hearing (2/7): 11 attended and 3 commented. 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. Of the 3 comments received, 2 commented on Snapper Grouper Amendment 43.

- One fisherman questioned the numbers used in the assessment for catch and discard mortality.
- Both questioned MRIP estimates.
- One fisherman suggested requiring electronic recreational reporting.

In addition to the statements on the record, fishermen questioned the catch and discards estimates. There were some questions about red snapper landings in Florida. Some encouraged better reporting in the private recreational fishery.

Atlantic Beach, NC public hearing (2/8): 15 attended and 3 commented. 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. Of the 3 comments received, 3 commented on Snapper Grouper Amendment 43.

- One fisherman suggested there were more red snapper than has been seen in a while.
- One fisherman suggested the need for recreational stamp and reporting.
- One fisherman suggested opening a red snapper season for recreational and commercial.
- One fisherman suggested descending devices are an option to reduce bycatch. If a fisherman uses a descending device, then the fisherman would be allowed to possess a red snapper.

Discussion at the meeting focused on catch and discards estimates. The population seems to be much better than the model indicated. The fishermen wanted to be able to possess some red snapper.

Written Comments:

There were 60 comments (online comment forum) submitted for Amendment 43 by February 10th, an additional 13 to a previous reporting page (provide at end of summary), 2 written comments (provide at end of summary), and 2 comments (provide at end of summary) received from online comments to NMFS. The comments are separated into the four categories based on the scoping questions.

Measures to reduce number of discards

- Some fishermen suggested closed areas for certain months if that time is known to have a high abundance of red snapper.

- Several fishermen were concerned that new regulations might prevent fishing and create closed areas or seasons.
- Some fishermen have been able to avoid red snapper by changing areas where they fished.
- One fisherman suggested no red snapper were off Islamorada in 150-200 ft.
    - Others indicated red snapper were being caught off Islamorada in a variety of depths.
- Some fishermen suggested closed areas should only be used as a last resort.
- Few fishermen suggested creating a snapper grouper season in shallower water.
- One fisherman suggested avoiding fishing in aggregation areas.
- One fisherman suggested reducing number of hooks to the bag limit.
- One fisherman suggested education on using a weak leader to reduce interactions with red snapper. Larger fish could break off the leader but swivel and weight would remain.
- One fisherman provided the following options to reduce red snapper discards:
    - Manage with a snapper grouper season
        - Allow possession of red snapper with a shorter season,
        - No possession with a longer season, or
        - off NE Florida where incidental catch is highest.
    - Closing additional areas to protect snapper grouper.
    - Close offshore snapper grouper fishing until the red snapper biomass is rebuilt.
- Some fishermen suggested allowing harvest of some red snapper could reduce discards because people would stop fishing after they caught red snapper.

Reduce Discard Mortality

- Some fishermen suggested a tag program to test effectiveness of descending devices.
- Several fishermen indicated circle hooks and venting reduced discard mortality.
- Several fishermen suggested improving education and outreach on discard mortality.
- One fisherman suggested promoting slow ascending to reduce discard mortality.
- Many fishermen thought the discard mortality estimate is over-estimated.
- Many fishermen recommend requiring descending devices.
- Several fishermen suggested citizen science to verify the discard estimates or discard mortality.
- Some fishermen suggested predators are feeding on discarded red snapper.

If a limited season were allowed

- Most fishermen suggested a recreational season to allow harvest of red snapper.
- Most fishermen suggested the red snapper population is doing much better than the past.
    - Some suggested biomass estimate is too low.
- Many fishermen suggested if a season is allowed, size and bag limits would be best to manage the fishery.
    - At least one fish per boat with slot limit.
    - Bag limit with all red snapper retained.
    - 19” size limit and 2 per vessel recreational and charter, 1 per person headboat, 5 per vessel commercial.
    - One per person or 6 per vessel.

    - 1 or 2 fish per trip.
    - 1 per person per trip.
    - 1 or 2 per person.
    - 2 per person per year or season.
    - 2 per person, 18” size limit, and May-December Season.
- Some fishermen suggested a harvest tag program to allow harvest of red snapper.
    - One fisherman suggested making harvest tags non-transferable.
- Some fishermen suggested improving education on when to leave a hook in the fish and taking pictures in water as opposed to on the deck of the boat.

Recreational Reporting

- Some fishermen suggested a federal saltwater fishing license.
- Several fishermen suggested recreational reporting could be done via electronic technology.

Other

- A few fishermen suggested enhancement through stocking.
- Some fishermen suggested using regional management.
- Some fishermen suggested states should manage the fishery.
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Timestamp	Please enter your full name:	Please enter your e-mail address:	Mailing Address	How do you participate in fisheries in the South Atlantic? (Check all that apply)	Please provide your comment on Snapper Grouper Amendment 43 (red snapper & recreational reporting):
1/12/2017 12:32:35	sam young	young456@aol.com	191 Lamplightr Dr, Marco Island, FL 34145	Private Recreational Angler, Charter/Headboat/For-hire	As an MREP graduate and Director Fisheries Management for the Marco Sportfishing Club, I would require that Seaqualizers be used on every trip for both Red Snapper and Grouper. This was proven to a successful survival rate in excess of 90% as presented by NOAA data. As for Rec reporting, standardize and require joining a reporting portal when purchasing a fishing license. This could be an existing portal like I-Angler or one managed by NOAA and FWC. NO VMS for Charter boats, use a smart phone app instead. I charter 10% of my time, I cannot afford to support a VMS on my vessel with such limited charter operations. VMS is an extreme measure for charter vessels vs. larger commercial and head boat operations. Most charter vessels are 24-35 ft center consoles with limited space for VMS. Start monitoring with an incremental approach vs. going to the extreme of VMS.
1/16/2017 20:29:04	Michael Pisciottano	mikepisciottano973@gmail.com	890 beard ave Sebastian fl	Private Recreational Angler, Charter/Headboat/For-hire, Commercial Fisherman	I feel as does every fisherman I talk to ad read about on forums that the red snapper population is over flowing. We can't catch anything but red snapper. The population is not at by any means over fished. The data that the council receives is wrong.
1/23/2017 11:05:46	Joseph Waddill	j_waddill@bellsouth.net	115 Oleander Street, Neptune beach, Fl 32266	Private Recreational Angler	Every trip I take offshore red snapper are overly abundant. I have fished offshore of NE Fl for decades, and have seen the numbers of red snapper increase dramatically, even before the SAMFC became involved. Now the red snapper numbers are incredibly high, and it is sometimes difficult to catch other species of fish. Please allow a season for red snapper, because it has been closed for a long time. Now that my boys are old enough to take offshore, I would like them to enjoy this resource, as I did.
1/23/2017 21:28:36	Bill Parker	runfish1@roadrunner.com	28 EAGLE CLAW DR.	Charter/Headboat/For-hire	Red snapper have recovered! Reduce discard mortality rate to 10-15% where it should have been all along. Bag limit 2 per person, min. size= 18". Season: May-December.
1/25/2017 17:30:01	Otto A. Gruhn	otto@gruhnmay.com	1182 Neck Road Ponte Vedra Beach Florida	Private Recreational Angler	I am 53, been recreational fishing offshore northeast Fl for 40 years and need to address the Red Snapper closure. As stated in most recent actions; "The Council will seek input on the following: •Ways to reduce bycatch of red snapper. •Ideas for developing and promoting best fishing practices to address barotrauma and reduce bycatch and discard mortality. •If the dead discards are reduced sufficiently, explore management measures for commercial and recreational measures during a limited red snapper season. •Ways to improve the estimate of recreational harvest and discards of snapper grouper species in the private recreational fishery." Sometimes the regulations have unintended and even counterproductive effects, I believe this this to be true regarding total closure of the Red Snapper fishery and can provide real actual firsthand evidence to support this assertion. I can with 100% certainty show how the Red Snapper closure has on numerous occasions directly caused the mortality of substantially greater numbers of Red Snapper especially larger fish than a modest per person catch limit would. This is actual, not hypothetical or anecdotal, it is fact, I and those in my fishing party will attest to these facts and do gladly invite any Council or Board member aboard my vessel in order for them to witness the situation firsthand. During at least 8 day (6-8 hours of fishing) trips during the spring and summer of 2016, I and no more than 5 and no fewer than 4 others made trips to various offshore fishing grounds in an attempt to harvest grouper, seabass, triggerfish and others in depths ranging from 80ft-120ft. During each of these trips we hooked no fewer than 20 Red Snapper ranging from 15"- 30+", all were released, those that showed signs of barotrauma were properly vented prior to release. During these 8 trips we hooked no fewer than 160 Red Snapper, using a discard mortality rate of 40% shows that we unintentionally killed 64 Red Snapper, which is substantially more fish than a one fish per person limit would have allowed during the same number of trips with 5 persons fishing. Furthermore, the number fishing trips made would have been greatly reduced had we been allowed to harvest one fish per person during the first trip given the fact that subsequent trips would not have been warranted because of the amount of fish landed and kept during the first trip. I am not going to travel 35 miles offshore to catch more Red Snapper when my freezer is already full, therefore if I could keep one fish per person I would likely only kill 6-8 fish per year as opposed to the 64 dead fish resulting from the closure which forces me to target other species resulting in much greater discard mortality of Red Snapper. The closure kills more fish than a one fish per person limit. Sincerely, Otto Gruhn
1/25/2017 18:11:23	Roddy Corr	Rodzilla913@gmail.com	416 Carmine Drive Cocoa Beach, FL 32931	Private Recreational Angler, Charter/Headboat/For-hire	The recreational community is for increased reporting, however the hesitancy is that the data will be used against us to continue to keep this fishery closed unnecessarily. For example if I report I didn't catch any red snapper then the logical answer is to keep the fishery closed since there are no fish. If I report I caught 30 red snapper while mangrove snapper fishing the answer will be "oh you killed to many via dead discards" so we have to keep the fishery closed. Its the proverbial hamster in a round ball chasing its tail. I have been fishing in east central Florida coast since 1989 and the fishery has never been in better shape. Its tuff to catch other bottom fish due to the large amount of snapper. Lastly the data contained in the latest stock assessment pertaining to dead discards is ridiculously off base. We are very careful with circle hooks, venting tools, etc. and these fish do fine.

Timestamp	Please enter your full name:	Please enter your e-mail address:	Mailing Address	How do you participate in fisheries in the South Atlantic? (Check all that apply)	Please provide your comment on Snapper Grouper Amendment 43 (red snapper & recreational reporting):
					January 24, 2017 Written comment Amendment 43 Atlantic Red Snapper Management options My name is Captain Jimmy Hull, and I have been commercial fishing the Atlantic Red Snappers for over 41-years out of Ponce de Leon Inlet Florida. Thank you for giving me, as a fisherman the opportunity to provide input about the current Red Snapper stock and management options. The SEDAR 41 Beaufort Assessment Model (BAM) results indicate the Atlantic Red Snapper biomass by age to be at 1975 levels. The BAM results indicates that it is about at one-third of the biomass compared to 1955. As a result, the BAM indicates that the stock is overfished and overfishing is still occurring. Fishermen disagree with this conclusion of the BAM that the biomass is greatly reduced verses the historical record. During the 1970's, there were no size limits, bag or catch limits for Red Snapper. Then in August 1983, a 12-inch size limit was enacted; then in January 1992 a 20-inch size limit regulation was enacted. Fishermen quickly observed an increased improvement and rebuilding of the Red Snapper stock abundance from the 1990's to the present. Following the 1992 size regulation implementation fishermen observed several new age classes moving into the population. As a result fishermen began interacting and measuring fish, taking note of their observations of a rebuilding Red Snapper biomass. Fishing was good, environmental factors and new management rules were working. Fishermen and coastal fishing communities were onboard with accurate fisheries science and management. The original NMFS Red Snapper stock assessment conducted for the SAFMC was completed during 1998 (http://sedarweb.org/docs/wsupp/S41_RD50_Manooch_etal1998.pdf) and indicated that the stock was rebuilding, while responding well to management. Fishermen observations agreed with that conclusion and the improved data validated the results of that assessment. Yet the NMFS Beaufort Lab failed to conduct a continuity run for the original assessment model and instead completely changed to the BAM analysis to start assessing Atlantic Red Snappers. In 2008, the SEDAR 15 final report indicated that the Red Snapper stock was overfished and overfishing was occurring, with only 500-thousand Red Snapper left in the Western Atlantic Ocean Red Snapper stock. Fisherman were shocked and disagreed and we found these conclusions to be the polar opposite of what we had been observing fishing on the water. By 2010, SEDAR 24 was completed and that assessment indicated the Red Snapper stock was overfished and overfishing was occurring. The BAM analysts believed the stock had rebuilt just enough to avoid a complete closure of bottom fishing in many areas as shallow as 98-feet of depth out to 240-feet. Fishermen believed that these conclusions again were incorrect and inconsistent with their fishing observations on the water. Since 2009, fishermen have been committed to working cooperatively with state and federal scientists to produce data to attempt to better inform the BAM model of the abundant and rebuilding Red Snapper stock we've observed on the water. During 2010, fishermen were involved with a cooperative tagging program targeting the Atlantic Red Snapper worked with the State of Florida's Fish and Wildlife Commission (FWC) Fish & Wildlife Research Institute (FWRI) teamed with the Southeastern Fisheries Association (SFA) and the Gulf & South Atlantic Fisheries Foundation (GSAFF). This cooperative fishing effort produced 3340 measured and tagged Red Snappers caught along the east coast of Florida. The mean total length (TL) of Red Snapper in this 2010 study was 547-mm (over 21-inches) which indicates the average age of the stock was 4-years old. That was 6-years ago and now the fish in that age class have moved thru the stock and the mean TL has increased significantly and have now became productive 10-year old Red Snappers. These large fish can weigh 20-pounds or more Fishermen are commenting that they are currently observing and interacting with abundant 800-mm (over 31-inches) in length Red Snapper populations while fishing. This same study indicates many Red Snapper samples out to 900-mm (over 35-inches) in length were caught also. The fish that were 10-years old about six-years ago when this study was conducted are now productive 16-year old Red Snappers, all well over 20-pounds or more in size. Fishermen agree with the results of the State of Florida data rich intensive Red Snapper study thru the observed data and thru our observation and interactions fishing for the Red Snappers. Why doesn't the observed data in the BAM model show these older fish? Fisherman have been cooperatively collecting larger older fish beginning June 2009 with the FWC. In 2012, a Red Snapper mini-season tournament sampling was conducted by Florida's FWRI scientists. The results of this study (see Figure 27 graph below) show that length frequencies of Red Snapper harvested indicate many Red Snappers were 650-mm and larger out to 880-mm and were more numerous than smaller Red Snappers measuring less than 650-mm in length. This sampling effort is providing observed data points of an increasing biomass of older, larger Red Snappers that are highly productive further adding recruitment to an ever expanding population. Why doesn't the observed data in the BAM show these older age class fish in the population? Recreational mini season catch There has never been more abundant numbers of Red Snapper than at the current time. The SEDAR 41 BAM model indicates this. (see graph below) We agree and the observed data validates this model conclusion. Fishermen have been reporting the increasing abundance for many years, before the results of SEDAR 15, SEDAR 24 and SEDAR 41 were finalized. Now we can all agree that the Red Snapper stock abundance as measured in numbers is larger than it has ever been, yet we were are told by the BAM analysts that this stock should be full of 20, 30 and 40-year old fish. Fishermen disagree, and we are advising that in our opinion based on real observations and referencing the frequency graph in numbers of Red Snappers above, that the Red Snapper stock is totally rebuilt both in abundance and historical age structure. The model assumption of the BAM analysts that prior to around 1978, the stock biomass was made up of many metric tons of fish older than 10-years of age is not validated by any observed data or empirical data. The inaccurate assumptions of a huge long lived, older-aged Red Snapper biomass has destroyed the BAM's ability to accurately assess the stock. The current Red Snapper stock is rebuilt as nature intended it to be. This is a fish stock that is able to reproduce an abundance of new recruits (see graph below) in numbers never observed before. The Atlantic Red Snapper stock high recruitment periods are that of a totally rebuilt stock. This stock is made up of highly productive, aggressive fish living in a very competitive ocean where they eat and are eaten. Very few Red Snapper will ever survive beyond 20-years of age. That is the way it was prior to 1970's and that is the way it is today forty-six years later. The Red Snapper stock rises and falls in abundance based on recruitment, predation, competition, environmental factors and management. This is not a fish stock hypothetically designed by a model to assume a stock structure of what it never was and never will be, a stock of predominated by 20, 30 and 40-year old Red Snappers.

Timestamp	Please enter your full name:	Please enter your e-mail address:	Mailing Address	How do you participate in fisheries in the South Atlantic? (Check all that apply)	Please provide your comment on Snapper Grouper Amendment 43 (red snapper & recreational reporting):
1/29/2017 19:01:33	Jeff Andress	tps_jeff@rocketmail.com	3240 Aurantia Rd. Mims, Fl. 32754	Private Recreational Angler	SAFMC, My name is a Jeff Andress, I'm a recreational fisherman on the east coast of central Florida and I have been fishing for reef dwelling fish out of Port Canaveral and Ponce Inlet since the early 1990's. My experience catching Red Snapper before the closure was actually improving, which I assumed was the result of the imposed limits implemented around the time I began participating in the fishery. Since the closure, the shear quantity of red snapper appears to be negatively affecting all near shore to well offshore hard bottom areas locally. By this I mean that other species have either become prey, or they have relocated to avoid becoming so. Additionally, the pressure on other species as a result of the closure is having a negative impact on those populations as well. My experience with red snapper catches for the last 4 years is highly inconsistent with the truncated population indicated by survey data. Specifically, offshore Daytona Beach catches regularly include multiple red snapper in excess of 20 pounds. The assumed mortality used by the commission for stock assessment associated with red snapper catch also seems excessive and inconsistent with my experience. The number of red snapper killed during my trips never exceed 10-12%. I avidly support the immediate employment of recreational catch data to be utilized in stock assessment. I fished 6 of the 8 open red snapper season days in July 2014, and I was never offered a way to report my catch data, never surveyed at a dock, never received a card in the mail, or a phone call. Please implement an electronic means of reporting NOW. The closure has been in effect for almost 7 years and the biomass increase without 10+ year old red snapper population increase is extremely improbable. It's likely just much harder to get an accurate count on larger fish. Incentivize catch reporting with tags or stamps, so that anglers have an opportunity to at least bring a fish home if they are unable to release it alive. Provide a way for anglers to provide carcasses for research from fish brought home. This should allow freezing and the creation of drop sites & dates. The negative economic impact on tackle shops, boat manufacturers, retailers & marinas as a result of this closure has been painful to watch and endure. I realize funding to support adequate surveys and research has been insufficient, but basing the continuation of the closure on insufficient data should be just as illegal as keeping fish from an over stressed red snapper population. I implore the management council to act now to obtain better catch data and incorporate that data for a more accurate representation of this fishery. I am willing to report my catch data, if you will use it in a timely manner, I suspect there a re a few hundred other central Florida anglers who are willing as well.
1/31/2017 17:07:21	Jeff Soss Jr.	cuintheriver@gmail.com	805 Harbor Place Drive	Private Recreational Angler, Charter/Headboat/For-hire	I am a for-hire inshore guide serving the Savannah area. I have run 400 trips over the last 3 years, since I started Savannah Fishing Adventures. I am a member of the CCA Georgia State Board of Directors. I have participated in the Marine Resource Education Program, an invaluable course which teaches and explains two main focuses, Data Collection and hows its processed and Public Policy and how the data is made into regulation. This is a possible solution to educate on descending devices, inform anglers on how data is collected, processed and how conclusions are drawn. And a way to collect a huge amount of data from the recreational sector. •Certificate of Descending Devices and Data Collection oSimilar to catch reporting for captains in the recreational sector o30 minute- one hour online/mail-in course □How to properly use descending devices including venting □How data is collected, processed, used and how decisions are made based on it □Why accurate data is important □How to report/app □How to make your own descending device i.e. milk crate, weighted crabbing net oApp/Mail-in/Online PC reporting □Reporting of total red snapper caught □Approx. size bracket 0-12in____ 13-20 in____ 21-32in____ 33 and up____ □Released fish conditions #GREAT___ #GOOD___#BAD___ #NOT SURE___ •After 6 months of program implementation, a 2 month review of red snapper mortality rate. oProgram participants are allowed to participate in a mini-season, should data reflect an increase in survivability. oMini-season parameters are not important. Anything that gives me incentive to participate in learning descending devices and data collection. □Example of mini season: 10 days, 2 per angler/certificate holder, 6 per boat max Mini season participants are required to have the following: oCertificate of Descending Devices and Data Collection oA descending device (one of three/five approved) oCatch reported within 24 hours of trip □Mini seasons can also be broken down to each state or segment of South Atlantic oQuestions: Is this a legal process? oWill this incentive drive data collection to its limits? oWill the data collected be useful? oWill the education effect the mortality rate? oWill a better informed crowd drive progress? Of course this is a rough template but the premise behind it remains. Educate and retrieve data but give an incentive. Otherwise the stalemate between anglers and policy leaders will stay the same. This is a way to work together and accomplish the goals of both parties. For anglers, knowing how this data collected, processed and used is a major disconnect. Why can't we keep snapper? There are a ton of them out there????? Mortality Rate… For Policy Leaders and Researchers, more reliable data while driving public participation with a better informed following would be a major accomplishment. Captain Jeff Soss Jr. Savannah Fishing Adventures Cell: 912-660-8416 CaptainJeff@savannahfishingadventures.com http://www.savannahfishingadventures.com/
2/1/2017 17:48:48	Xavier Figueredo	info@bayandreef.com	81991 Old Hwy	Charter/Headboat/For-hire	The red snapper management quagmire is begging for a new approach to data collection and a new/better approach to reducing dead discards. With apparently limited financial resources, can you make a case for broadening your scope of data collection by including the recreational sector? Commercial fishermen have to report all catch, for-hire charters are required to report, and the larger rec sector has virtually no accountability with the existing "monitoring." Electronic reporting, in today's age of tech, should not be too challenging to implement and then use. Augment that with an aggressive "BETTER DATA" campaign (with short, mid, and long-term communication/ analysis of how the program is working) and maybe there is hope to get us (fishermen) to better trust the process. Obviously the dead discard rate needs to be addressed – can we look more closely at descending devices that work? and education for how to use these properly?

Timestamp	Please enter your full name:	Please enter your e-mail address:	Mailing Address	How do you participate in fisheries in the South Atlantic? (Check all that apply)	Please provide your comment on Snapper Grouper Amendment 43 (red snapper & recreational reporting):
2/2/2017 8:14:18	Mike Conneen	mike@anglersforconservation.org	3700 2nd Ave Malabar Fl. 32950	Private Recreational Angler, Non-Governmental Organization	Thank you for this opportunity to provide written comments on the South Atlantic Fishery Management Council Amendment 43. Atlantic red snapper is an especially important species for fishermen in Central and Northeast Florida. If we are to have a fishing season in the near future and, longer-term, a rebuilt red snapper stock, then we must take action now to minimize dead discards and improve data collection in the private recreational fishery. Anglers for Conservation's mission is to inspire new generations of marine stewards through education, conservation, and community outreach. In May 2016, we published a blog advocating fishermen practice correct catch and release practices for deep-water species. Descending devices can mean the difference between a live and dead discard, but how much of a difference they make in real-world fishing conditions remains a point of contention. It is clear that the Council should conduct further research on these technologies and educate fishermen on how to use them before promoting their widespread use. In the meantime, the Council should examine the utility of deep-water snapper and grouper fishing seasons for reducing barotrauma-induced post-release mortality. Such seasons might be supplemented with spatial management measures to shift fishing effort away from areas with particularly high red snapper bycatch and mortality. We encourage the Council to explore these ideas further in draft Amendment 43. How fisheries data is collected and used in management is also extremely important. And, even more important is the fishermen's trust in those data. We were pleased to see the Council establish a full time Citizen Science position. Its our hope that Amendment 43 will build on that work by taking steps to identify the universe of deep-water recreational fishermen, such as through a permit system, and involve those anglers in the collection of catch and effort data for their fishery. These actions will go a long way towards improving management of fishery resources and building trust between fishermen, fishery scientists, and managers. Thank you for your time and consideration of these comments. Mike Conneen Executive Director Anglers for Conservation
2/2/2017 8:55:52	Jeff Soss Jr,	cuintheriver@gmail.com	805 Harbor Place Drive	Private Recreational Angler, Charter/Headboat/For-hire	This is an amended comment in place of a previous one. Whether or not the numbers are accurate, we HAVE to make the numbers look right in the eyes of SAFMC. Because they are bound by law to adhere to the numbers they have. There are 4 main things we HAVE to accomplish: •What is the best way to reduce discards/removals(fish that are caught and released regardless of condition) of red snapper to stop overfishing? •What management measures could improve the survival of discarded red snapper? •If red snapper removals(landings and dead discards) are reduced significantly, limited harvest may be possible. What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed? •How could estimates of catch, discards, and effort in the private recreational snapper grouper fishery be improved? My proposal encompasses all of these factors. It makes it so the numbers show up correctly in the eyes of SAFMC. This is a possible solution to: •Educate on descending devices so that the dead discards are reduced. •Inform anglers on how data is collected, processed and how conclusions are drawn. Because I want to know how they got this info and how they draw these conclusions. That way I can better keep them accountable AND I better understand how I can make a difference. • And a way to collect a huge amount of data from the recreational sector, which is what they(SAFMC) has been asking for more and more. This will especially show them WHAT I SEE out there. Basically it's a Certificate or program that can be done online in one hour or so. •Lets call it Certificate of Descending Devices and Data Collection (CDDDC) •One hour-ish online/mail-in course •How to properly use descending devices including venting •How data is collected, processed, used and how decisions are made based on it •How to report/phone app so we can easily report our catch •After one year of program implementation, the information gathered is sent to be reviewed •If the program proves successful and the snapper population shows the progress we need, we open a mini-season to the participants. With only 30,000 potential fish to be kept, it does not give us a productive season. This proposal would use this small amount in the best way possible. •Mini-season parameters are not important. Anything is better than what I get now. •Mini seasons can also be broken down to each state or segment of South Atlantic because we all know Florida, GA, SC, NC and anyone north have TOTALLY different fisheries. •This program can be implemented for many other species including the entire snapper grouper complex as well as a requirement if a recreational snapper grouper permit were put in place. Of course this is a rough template but the premise behind it remains. Educate and retrieve data but give an incentive. Otherwise the stalemate between anglers and policy leaders will stay the same. This is a way to work together and accomplish the goals of both parties. For anglers, knowing how this data collected, processed and used is a major disconnect. Why can't we keep snapper? There are a ton of them out there????? Show me what I need to know so I can figure out where you get this info… And give me a voice through reporting so you can better understand WHAT I SEE on a day to day basis.

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Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for Amendment 43 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region (Amendment 43) and Notice of Scoping Meetings

Comment On: NOAA-NMFS-2016-0157-0001
Fisheries of the Caribbean, Gulf of Mexico, and South Atlantic: Snapper-Grouper Fishery of the South Atlantic Region; Amendment 43, Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS)

Document: NOAA-NMFS-2016-0157-DRAFT-0006
Comment from anonymous anonymous

Submitter Information

Name: anonymous anonymous

General Comment

I support changing and adjusting annual catch fishing limits and recreational annual fishing target catches. Both are necessary to prevent over-fishing. To do so, the National Fisheries Service and others must improve the quantity and quality of data collected from private recreational fishermen. Our coastlines and marine regions as well as the continental fishing areas MUST be protected! Reducing bycatch and dead discards helps to protect the fragile environment of marine life. This is a most welcome add-on to this amendment.

Captain William R. Hoge
Sea Love Charters
220 Nix Boat Yard Road
St. Augustine, FL 32084

February 3, 2017

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FEB 08 2017
South Atlantic
Fishery Mgmt. Council

To the South Atlantic Fishery Management Council,

My name is Captain William R. Hoge, and I am writing this comment in regards to Snapper Grouper Amendment 43. I graduated from the University of Miami in 1987 with a double major in Marine Science/Biology. For the first nine years after graduation, I worked as an environmental consultant to the United States Air Force (USAF). One of my tasks for the USAF was the writing and implementation of fish and wildlife plans. I currently live in St. Augustine, FL and for the past 20 years I have fished the offshore waters of Northeast Florida as a deckhand, commercial fisherman and captain. In January of 2005, I purchased Sea Love Charters.

Sea Love Charters has been part of St. Augustine since 1980 and part of Daytona since the 1960's. The Sea Love Charter fleet consists of "Sea Love II", a 70' party boat with a 60 passenger capacity, the "Sea Love III", a 50' party boat that holds 35 passengers, and "Reel Therapy", a 40' six pack sport boat. Last year, Sea Love Charters took approximately 40,000 people fishing. It is a safe and economical way for people to enjoy deep sea fishing.

I recently attended the January 23 meeting in Jacksonville, FL and sat through the scoping presentation for Amendment 43 by Mr. Chip Collier. I will address each of the four issues the council wants input on, but before I do, I would first like to reiterate what every commercial, recreational and for hire fisherman and diver in the room was saying, there is an abundance of red snapper off our coast.

There are so many red snapper that they have become a nuisance and there is no way to avoid catching them. Every spot is covered with them including those well inshore that never had them before. In fact, before the engines are turned off, a pack of 20 pound plus fish will swim to the boat. Speaking with divers, the bottom is also covered with red snapper along with the invasive lionfish. Red snapper are very voracious, and I am sure that they devour every juvenile snapper, seabass, grouper, porgy, lobster, and crab they can find. A ten pound mangrove snapper was recently caught that had four small sea turtles in its stomach, so it is not hard to imagine what damage these snapper can do to the turtle population. The grouper have long ago left our waters because there is no forage left for them. We literally only catch several keeper grouper per year. There is no denying the fact the red snapper population has exploded off our coast and has had a severe impact on the rest of the marine ecosystem.

As for the first point: What is the best way to reduce discards of red snapper to stop overfishing (as required by law)? The best way to reduce discards is to amend the model of discard mortality estimates used in the SEDAR 41 of 28.5%. As everyone in that meeting voiced, that percentage is way too high. We take very good care of our caught fish before release, and very rarely do we have a fish float off. Of course there are plenty of other ways for the fish to die, but almost every fish is released healthy. Florida Fish and Wildlife Conservation Commission (FWC) biologists regularly accompany us on trips and meticulously note the condition of every fish released. The SAFMC must review this data. I know fishing and release conditions vary across the fishing spectrum, but this data is very valuable, and it exists in the heart of the red snapper population.

The second point is what management measures could improve the survival of discarded red snapper? We do everything we can to ensure the survival of caught red snapper. If possible, the recreational angler could possibly use more education on the handling of caught fish. Other than not fishing for them, there is not much more that can be done.

The third point asked by the SAFMC is if red snapper removals (landings and dead discards) are reduced significantly, limited harvest may be possible. What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed? There is no reason to even answer this question because the SAFMC has no intentions of opening the red snapper season. It is an obvious fact that the more snapper there are, the more the discards there will be, and there will never be a feasible way to reduce the number of caught and released fish to less than 250,000. This is the point where the SAFMC loses their credibility to the fishing public. What is the point of asking this question other than providing false hope to the fisherman who relies on this species for a living?

What are potential ways to reduce the number of discarded red snapper? After stating the above facts, the only logical answer and conclusion that should never be allowed to happen is to close the ocean to fishing. This whole Amendment 43 sounds like a political stunt concocted by small interest groups and leaders. The SAFMC has already failed in the past with Amendment 17A to set area closures aside. The FWC, our Florida Congressmen, the tourist industry, and 99.9% of fisherman were against it. With the new administration in Washington, I cannot imagine a closure would even be allowed to happen. If proposed, myself, every fisherman, diver, the FWC, and those that rely on tourism will oppose it. Please do not waste the resources of the taxpayer to fight something that does not need fixing.

The SAFMC has acknowledged that the red snapper population has almost quadrupled since 1991, and after talking with Mr. Collier, it seems that this growth has mainly occurred off the Northeast Florida coast. Mr. Collier maintains that the red snapper population is still down in the more southern and northern habitats, but this may be how the population dynamics will remain. It is my suggestion to manage the red snapper population in separate zones. Allow a red snapper season from South Carolina to Cape Canaveral to ease the burden on the ecosystem and continue the closure in the other areas.

I personally do not care if the red snapper season is ever opened or indefinitely closed even though many fishermen would rightfully disagree. People enjoy just being on the water wetting a line, and they will always continue to do so. It is fun to see the large fish swim up to the boat, and a customer enjoys the opportunity to fight a 20 pound plus trophy fish. A memorable photograph of the catch is all the customer needs, but you always hear the incessant questions of why do they have to release it when there are so many. The only thing we ask is please do not close the ocean to fishing. So much depends on that. If you have any questions, I can be reached at (904) 501-2158.

Sincerely,

William R. Hoge
President, Sea Love Charters

PUBLIC SUBMISSION

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Comment On: NOAA-NMFS-2016-0157-0001
Fisheries of the Caribbean, Gulf of Mexico, and South Atlantic: Snapper-Grouper Fishery of the South Atlantic Region; Amendment 43, Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS)

Document: NOAA-NMFS-2016-0157-0004
Comment from Natalie Rector

Submitter Information

Name: Natalie Rector
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129 Cleo Lane
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General Comment

I support the gathering of data to evaluate the stock of red snapper that this NOI proposes. If you do not collect data, how do you determine if they have been over fished? Also, the focus on reducing the discarding of fish is a very good addition to this study.

(1)

"SNAPPER/Grouper Admendment 43" Input on ways to Reduce discards, Improve discard estimates, and if Discards can be reduced sufficiently, allow Limited Harvest"

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FEB 08 2017
South Atlantic
Fishery Mgmt. Council

THIS IS A ROUGH DRAFT

Submitted by William (Bill) SHEARIN - 912-655-3202
→ 30 yrs Atlantic Ocean (GA, S.C, FL) Boat Capt
→ 9½ yrs Gulf of Mexico Boat Capt
→ Capt/owner of 6-pk & Multi-pass vessels

Copies to:

Greg Waugh - Director - SAFMC (FAX 843-769-4520
Doug Haymans - GDNR - doughaymans@gmail.com
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Julia Byrd - SAFMC - staff - julia.byrd@SAFMC.net
Steve Amick - Former member SAFMC/GDNR
Active Boat Capt - Multi-pass and 6 pack. 37 yrs experience
Scott Amick - Active boat Capt

(next sheet)

→ DAVID NEWLIN - Active boat Capt - GA.

Bob Barnett — Active boat Capt

Judy Helmey — Active boat Capt

PALMER HODGES - Pioneer in Atlantic Ocean REEF fishing - still Active

Wayne Emory — Inactive boat Capt - FL - Superb knowledge of Reef Fish

CHARLES-NORWOOD — Owner Sea Hag Marina, Steinhatchee, FL

GON MAGAZINE

WOODS and WATERS MAGAZINE

FLORIDA SPORTSMAN MAGAZINE

DR. Kyle Christensen - GA REEF fishing Angler

The Reef fishing experience

Charter boat Capt with PAYing Anglers / Recreational Boat Owner with Anglers on board.

→ the necessary basics for A successful fishing trip

→ Both of the Above Boat capts have U.S. COAST Guard Safety Equipment - G.P.S - Fish FINDER, etc, but most importantly to have a successful trip.

→ A LOG BOOK WITH GPS numbers where reef dwelling Fish live. Includes but not limited to RED SNAPPER, Grouper, Vermillion Snapper, Black Sea BASS, Trigger Fish, Grunts, etc.

→ Since its not possible to attach A note to terminal tackle that says RED SNAPPER - PLEASE DON'T TAKE BAIT OR you will end up at the surface 90' Above your home and then be discarded

(Next page)

→ the following is A solution for A 50% reduction of RED SNAPPER DISCARDS.

→ As I have written - THIS IS A ROUGH DRAFT and WILL NEED TWEAKING

SEE ENCLOSED Photos

→ This Quick change 10# test terminal tackle rig will most certainly reduce the number of Red Snapper DISCARDS

→ Voluntary USEAge - Anglers take note

→ If ½ number of Anglers use this Rig -
→ will reduce discards of RED Snapper by About 50 percent

→ Almost all Red Snappers over 5-lbs to 35 lbs will live to spawn - these fish will break the 10# Line - Hook shoud disolve.

→ We Anglers Are killing the female goose that lays the Golden Egg, when we land the ~~Femall~~ Female RED Snapper on the surface

→ A very Minimum of Vermillion Snapper, Black Sea bass, trigger fish, Grunts will escape from this 10# lb terminal tackle Rig

(next page)

→ This type fish will not escape or break 10# test leader,

→ As most Boat Capts and Anglers are aware — Hook-ups increase with lighter line and smaller hooks

→ A Red snapper break-off of this subject Rig will save your lead & swivel

→ This 10# test Rig is easy and quick to re-Rig.

→ I believe these experienced conclusions deserve serious ~~discussions~~ discussions by the various fish managers.

→ A limited Red Snapper season isn't going to happen unless a significant discard reduction is verified

→ If the RED snapper is landed from 80' — 140' water depth on the surface — the fish will likely be discarded & Float

(next sheet)

→ away to die. All Ocean Reef Anglers have viewed this sad sight.

→ My suggestion/solution is to give the Red Snapper a chance to escape and remain at the depth it was hooked.. A Red Snapper will be allowed to spawn and increase the Red Snapper population

→ Once the RED Snapper discards have been significally reduced, ~~then~~ we will have a LIMITED ~~openion~~ opening Season for All All Anglers to land and keep a trophy sized Red Snapper.

→ There are a multide of these large fish waiting to be ~~ha~~ harvested if Conservation goals are achieved in the Atlantic & Gulf waters.

Conclusion: TO Reef fish MANAGERS

→ AS I stated at the start and middle of this PAPER. this IS A ROUGH DRAFT

→ I can't imagine any resposible Angler who would NOT voluntarily support and practise A this type plan to reduce the discards of the AMERICAN RED SNAPPER. Its the most ~~Attractive~~ Attractive and sought After Reef Dwelling Fish family member in the ATLANTIC & GULF WATERS

Bill Sherrin
912-655-3202

(9)

(2)

Enclosures: pictures are worth a thousand words!

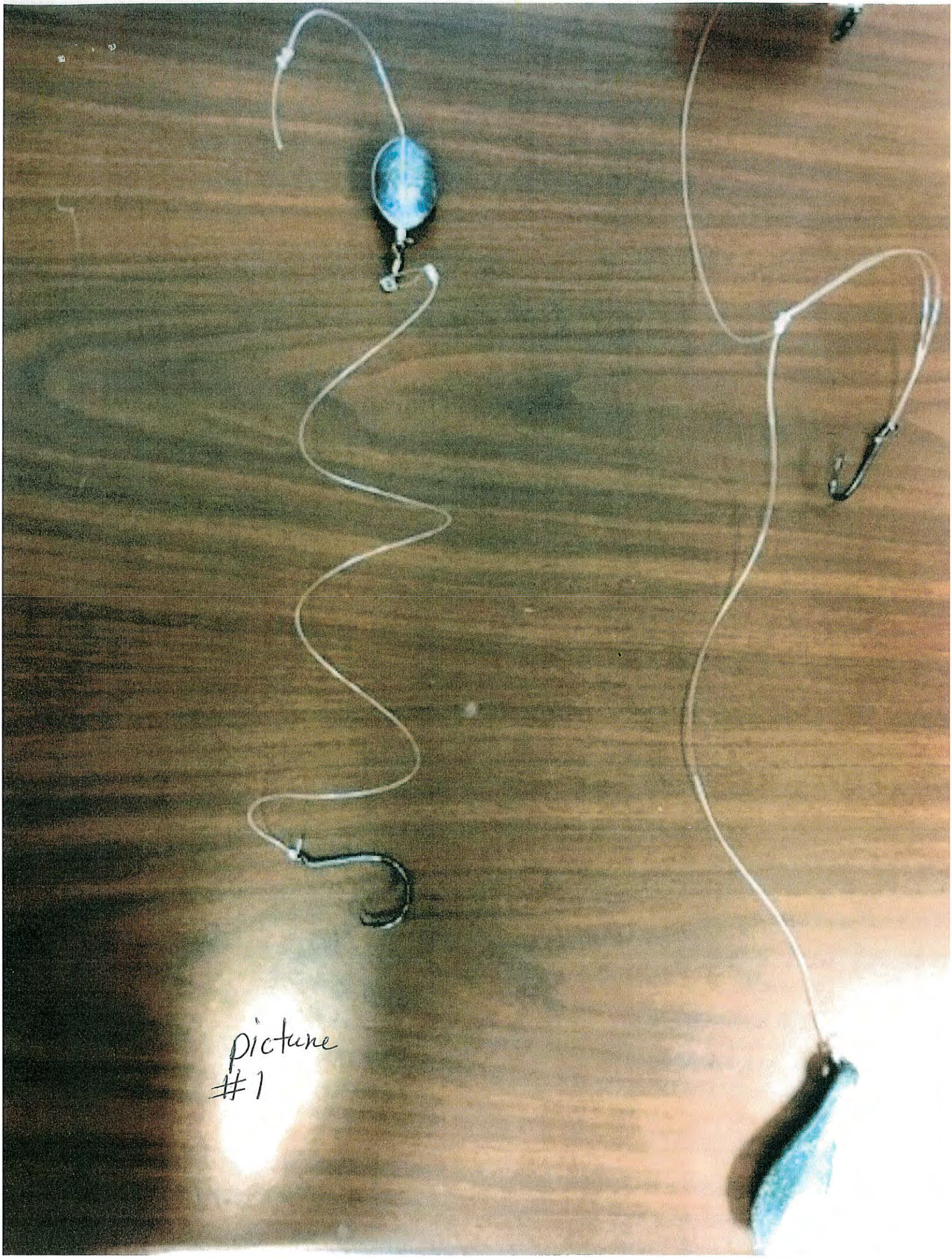
→ Explanation of pictures as relates to reducing Red snapper discards sufficiently to allow limited ~~entry~~ harvest of red snapper

→ picture #1 - standard 2 types of ~~Red Snapper~~ Reef Fishing terminal tackle Rigs

- 6 oz Egg sinker - 80 lbs main line on top
- swivel on bottom
- 50 lbs test next C allows breakaway to save lead & swivel
- 7/0 Circle Hook

- swivel - 80# test Rig 7/0 Circle Hook
- Bank sinker - ~~4~~ 8 oz

→ there are many various types of these 2 Rigs but all share this basic idea



picture #1

~~5~~ 9 10

picture # 2

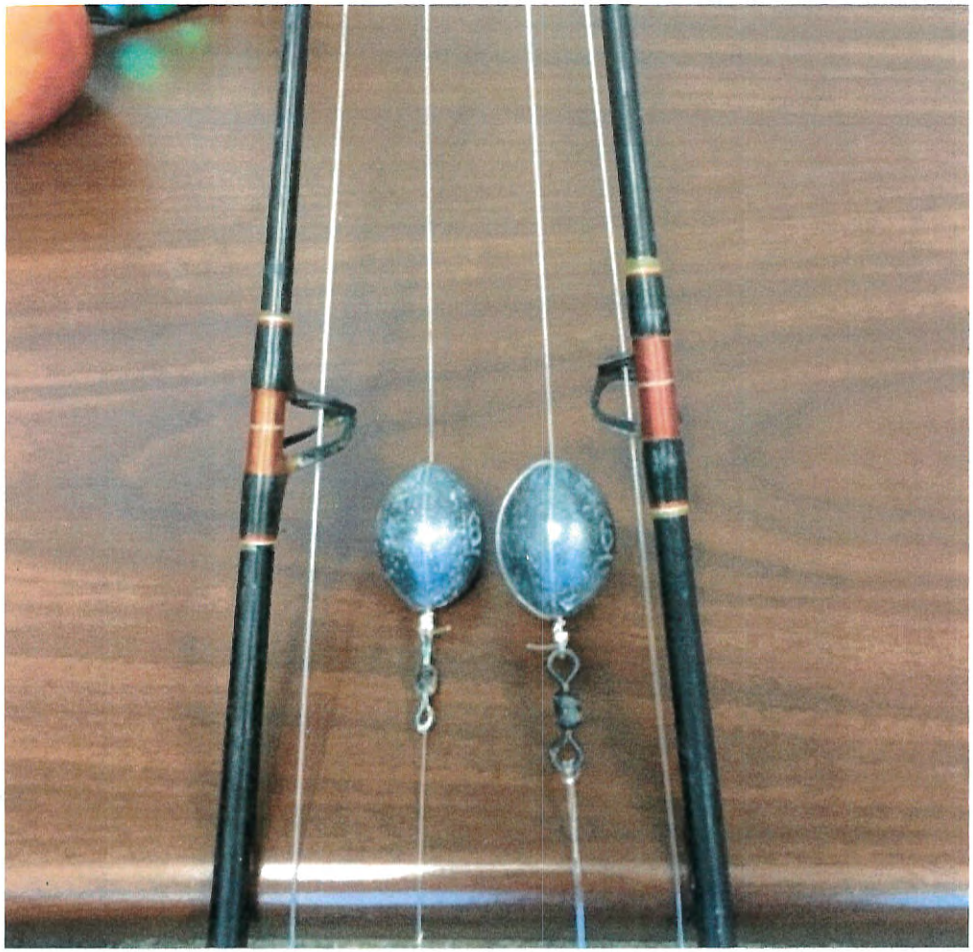
- Same Egg Sinker Rig as in picture #1 Except 50lb test leader is connected to ~~7/0~~ 4 Egg sinker swivel with a quick disconnect loop knot & 7/0 Hook
- Same Egg Sinker Rig as Above ~~Except~~ with 10 lb test leader connected to swivel with a quick disconnect loop knot and 2/0 Circle Hook

picture #2

picture #3:

- Both Rigs attached to Rod and Reel

starting on pg 4 are various ~~Red Sn~~ fishing ~~methods to Reduce Red Snapper Discards~~ and still Hook and land the smaller targeted Reef Fishes (Vermillion Snapper, Black Sea BASS, Grunts, etc)



picture #3 — ~~this is~~

Captain William R. Hoge
Sea Love Charters
220 Nix Boat Yard Road
St. Augustine, FL 32084

February 3, 2017

To the South Atlantic Fishery Management Council,

My name is Captain William R. Hoge, and I am writing this comment in regards to Snapper Grouper Amendment 43. I graduated from the University of Miami in 1987 with a double major in Marine Science/Biology. For the first nine years after graduation, I worked as an environmental consultant to the United States Air Force (USAF). One of my tasks for the USAF was the writing and implementation of fish and wildlife plans. I currently live in St. Augustine, FL and for the past 20 years I have fished the offshore waters of Northeast Florida as a deckhand, commercial fisherman and captain. In January of 2005, I purchased Sea Love Charters.

Sea Love Charters has been part of St. Augustine since 1980 and part of Daytona since the 1960's. The Sea Love Charter fleet consists of "Sea Love II", a 70' party boat with a 60 passenger capacity, the "Sea Love III", a 50' party boat that holds 35 passengers, and "Reel Therapy", a 40' six pack sport boat. Last year, Sea Love Charters took approximately 40,000 people fishing. It is a safe and economical way for people to enjoy deep sea fishing.

I recently attended the January 23 meeting in Jacksonville, FL and sat through the scoping presentation for Amendment 43 by Mr. Chip Collier. I will address each of the four issues the council wants input on, but before I do, I would first like to reiterate what every commercial, recreational and for hire fisherman and diver in the room was saying, there is an abundance of red snapper off our coast.

There are so many red snapper that they have become a nuisance and there is no way to avoid catching them. Every spot is covered with them including those well inshore that never had them before. In fact, before the engines are turned off, a pack of 20 pound plus fish will swim to the boat. Speaking with divers, the bottom is also covered with red snapper along with the invasive lionfish. Red snapper are very voracious, and I am sure that they devour every juvenile snapper, seabass, grouper, porgy, lobster, and crab they can find. A ten pound mangrove snapper was recently caught that had four small sea turtles in its stomach, so it is not hard to imagine what damage these snapper can do to the turtle population. The grouper have long ago left our waters because there is no forage left for them. We literally only catch several keeper grouper per year. There is no denying the fact the red snapper population has exploded off our coast and has had a severe impact on the rest of the marine ecosystem.

As for the first point: What is the best way to reduce discards of red snapper to stop overfishing (as required by law)? The best way to reduce discards is to amend the model of discard mortality estimates used in the SEDAR 41 of 28.5%. As everyone in that meeting voiced, that percentage is way too high. We take very good care of our caught fish before release, and very rarely do we have a fish float off. Of course there are plenty of other ways for the fish to die, but almost every fish is released healthy. Florida Fish and Wildlife Conservation Commission (FWC) biologists regularly accompany us on trips and meticulously note the condition of every fish released. The SAFMC must review this data. I know fishing and release conditions vary across the fishing spectrum, but this data is very valuable, and it exists in the heart of the red snapper population.

The second point is what management measures could improve the survival of discarded red snapper? We do everything we can to ensure the survival of caught red snapper. If possible, the recreational angler could possibly use more education on the handling of caught fish. Other than not fishing for them, there is not much more that can be done.

The third point asked by the SAFMC is if red snapper removals (landings and dead discards) are reduced significantly, limited harvest may be possible. What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed? There is no reason to even answer this question because the SAFMC has no intentions of opening the red snapper season. It is an obvious fact that the more snapper there are, the more the discards there will be, and there will never be a feasible way to reduce the number of caught and released fish to less than 250,000. This is the point where the SAFMC loses their credibility to the fishing public. What is the point of asking this question other than providing false hope to the fisherman who relies on this species for a living?

What are potential ways to reduce the number of discarded red snapper? After stating the above facts, the only logical answer and conclusion that should never be allowed to happen is to close the ocean to fishing. This whole Amendment 43 sounds like a political stunt concocted by small interest groups and leaders. The SAFMC has already failed in the past with Amendment 17A to set area closures aside. The FWC, our Florida Congressmen, the tourist industry, and 99.9% of fisherman were against it. With the new administration in Washington, I cannot imagine a closure would even be allowed to happen. If proposed, myself, every fisherman, diver, the FWC, and those that rely on tourism will oppose it. Please do not waste the resources of the taxpayer to fight something that does not need fixing.

The SAFMC has acknowledged that the red snapper population has almost quadrupled since 1991, and after talking with Mr. Collier, it seems that this growth has mainly occurred off the Northeast Florida coast. Mr. Collier maintains that the red snapper population is still down in the more southern and northern habitats, but this may be how the population dynamics will remain. It is my suggestion to manage the red snapper population in separate zones. Allow a red snapper season from South Carolina to Cape Canaveral to ease the burden on the ecosystem and continue the closure in the other areas.

I personally do not care if the red snapper season is ever opened or indefinitely closed even though many fishermen would rightfully disagree. People enjoy just being on the water wetting a line, and they will always continue to do so. It is fun to see the large fish swim up to the boat, and a customer enjoys the opportunity to fight a 20 pound plus trophy fish. A memorable photograph of the catch is all the customer needs, but you always hear the incessant questions of why do they have to release it when there are so many. The only thing we ask is please do not close the ocean to fishing. So much depends on that. If you have any questions, I can be reached at (904) 501-2158.

Sincerely,

William R. Hoge
President, Sea Love Charters

February 10, 2017

Dr. Michelle Duval
Chairman, South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
Charleston, SC 29405

Re: Scoping for Snapper Grouper Amendment 43 (Red Snapper and Recreational Reporting)

Dear Dr. Duval,

On behalf of The Pew Charitable Trusts, please accept these comments during the scoping phase of Amendment 43 to the Snapper Grouper Fishery Management Plan. The South Atlantic Fishery Management Council (Council) should develop management actions that end overfishing of red snapper as soon as possible to allow a sustainable fishery for the long term. In consideration of the four questions provided in the scoping document,[1] we suggest the following:

Question 1: What are potential ways to reduce the number of discarded red snapper?

- Conduct a robust analysis of seasonal and spatial management options, or a combination thereof, that reduce dead red snapper discards sufficiently to end overfishing.

Question 2: What are measures that could improve the survival of discarded red snapper?

- Request research to determine whether and to what extent descending devices may be a viable part of South Atlantic red snapper management plans.

Question 3: What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed?

- Implement new measures to help reduce discards, improve discard mortality, and provide better recreational data before any directed fishing for red snapper is allowed.

Question 4: What are the best ways to improve the estimates of catch, discards, and effort in the private recreational snapper grouper fishery?

- Develop a snapper grouper permit to provide a better estimate of effort in the snapper grouper fishery and allow for more targeted surveys;
- Explore mandatory electronic reporting for members of the private recreational sector fishing for snapper and grouper; and
- Conduct a citizen science project to collect discard data on scamp grouper for use in the 2018 scamp stock assessment and as a pilot project for other species, such as red snapper.

[1] SAFMC (2017) Scoping Document: Amendment 43 to the Snapper Grouper Fishery Management Plan of the South Atlantic Region. Available online at: http://safmc.net/download/Amendment43_ScopingDoc.pdf.

Background

A 2016 stock assessment of red snapper indicates that this economically and ecologically important species is still overfished and undergoing overfishing.[2] The good news is that the assessment estimates that since 2010, the South Atlantic population has been increasing at a modest rate and is now at levels comparable to those in the 1970s.

This is consistent with the increased number of red snapper that fishermen report observing on the water. However, despite the red snapper fishing moratorium established by the Council in Amendment 17A,[3] the assessment finds that the population is still below a healthy level, with too few of the older and bigger fish needed for long term sustainability. These findings indicate that the population is rebuilding, but it will take more than 6 years to rebuild a species that can live 50 years or more.[4] Recovery will be slow and steady.

A major obstacle on the red snapper road to recovery is the large number of discards and the poor survival rates of released fish. In 2014 and 2015, the average number of dead red snapper discards eclipsed 200,000 fish. This is four times the Science and Statistical Committee (SSC) recommended allowable biological catch for 2017.[5] As red snapper continues to recover and abundance increases, encounters and incidental catches are likely to increase as well. Thus, red snapper recovery depends as much on the right rules for all snapper and grouper fishing as it does on proper rules for fishing for red snapper itself.

In light of the science, we offer the following response to the questions in the scoping document:

1. What are potential ways to reduce the number of discarded red snapper?

Overfishing of red snapper continues because of the large number of dead discards. Reducing discards will require a sufficient reduction in fishing effort and red snapper removals to address the scale of the problem. This could potentially be achieved through seasonal and/or spatial management measures. There are several potential strategies that are worth further Council evaluation and analysis.

One option we encourage the Council to investigate is a recreational deep water snapper grouper fishing season. Such a season would give fishermen the opportunity to fish during a specified time period and keep catch within the allowable limits. During the "off-season" there would be no fishing pressure, reducing the number of red snapper that are discarded. While this is a promising approach, more analysis needs to be done to know if it is scientifically feasible to meet the goal of reducing the number of red snapper discards enough to end overfishing.

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[2] SEDAR (2016). SEDAR 41 – South Atlantic Red Snapper Assessment Report. SEDAR, North Charleston SC. 660 pp. available online at: http://sedarweb.org/sedar-41.

[3] SAFMC (2010). Amendment 17A to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region. Available online at: http://www.safmc.net/Library/pdf/Amend17Afinal071910.pdf

[4] Felicia C. Coleman et al. (2000). Long-lived reef fishes: the grouper-snapper complex. Fisheries 25: 14-20

[5] SAFMC (2016). Options Paper: Amendment 43 to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region. Online briefing book for the December 5-9, 2016 meeting of the SAFMC Snapper Grouper Committee, Attachment A10a.

We also encourage the Council to examine targeted areas where fishing for snapper and grouper could be allowed. These areas could be in shallower waters where barotrauma is less of a concern and released fish are more likely to survive.[6] If strategically located, these areas may reduce the number of red snapper discards enough to allow for fishing for other snapper and grouper to continue while still rebuilding red snapper. Scientific analysis should determine whether this approach will be feasible, and if so, the location and size of any potential shallow water snapper grouper fishing areas.

Implementing either one or a combination of seasonal and spatial management involves trade-offs and will require thoughtful input from the fishing community. We recognize that any large fishing closure is not a popular option. In order to comply with the Magnuson-Stevens Act (MSA) requirement to end overfishing, the number of discards will need to be greatly reduced. A robust analysis of the options that reduce dead red snapper discards sufficiently to end overfishing and their impacts to fishing communities should be conducted.

2. What management measures could improve the survival of discarded red snapper?

Discard mortality is a significant concern. During capture, red snapper are often brought to the surface quickly from deep depths resulting in barotrauma, including ruptured swim bladders, bloating and protrusions of stomachs, intestines and eyes.[7] The impacts can be lethal. The recent stock assessment estimates that 28.5% of recreationally discarded red snapper and 38% of commercially discarded die.[8]

Recently, there has been research done on the use of descending devices as a means to improve survivability of discarded fish, although data on their efficacy in helping red snapper in the South Atlantic to survive is scarce. During the December 2016 Council meeting in Atlantic Beach, NC, graduate student Brendan Runde, of North Carolina State University, presented results of a study that showed that the use of a SeaQualizer resulted in 60-90% survival rates for other deep water species, including snowy grouper, scamp grouper, and speckled hind.[9] Other studies have shown similarly positive results for red snapper in the Gulf of Mexico, but the applicability of these studies to red snapper in the South Atlantic is unknown.[10, 11]

As a follow-up to these promising outcomes, the Council should request research to determine whether and to what extent descending devices may be a viable part of South Atlantic red

[6] Curtis et al. (2015). Quantifying Delayed Mortality from Barotrauma Impairment in Discarded Red Snapper Using Acoustic Telemetry. Marine and Coastal Fisheries 7(1): 434-449.
[7] Drumhiller et al (2014). Venting or Rapid Recompression Increase Survival and Improve Recovery of Red Snapper with Barotrauma. Marine and Coastal Fisheries, 6(1): 190-199.
[8] SEDAR (2016). SEDAR 41 – South Atlantic Red Snapper Assessment Report. SEDAR, North Charleston SC. 660 pp. available online at: http://sedarweb.org/sedar-41.
[9] SAFMC (2016). Online briefing book for the December 5-9, 2016 meeting of the SAFMC: Snapper Grouper Committee, Attachment A03.
[10] Curtis et al. (2015). Quantifying Delayed Mortality from Barotrauma Impairment in Discarded Red Snapper Using Acoustic Telemetry. Marine and Coastal Fisheries 7(1): 434-449.
[11] Drumhiller et al (2014). Venting or Rapid Recompression Increase Survival and Improve Recovery of Red Snapper with Barotrauma. Marine and Coastal Fisheries, 6(1): 190-199.

snapper management plans. If the results are favorable and these devices are to be incorporated into management, science advisors should identify a plan to quantify changes in the overall discard mortality rates used when calculating total removals each year.

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

Before any directed fishing for red snapper is allowed, new measures are needed to help reduce discards, improve discard mortality, and provide better recreational data as described elsewhere in this letter. When a directed fishery can legally be allowed under the MSA, we urge the Council to take a precautionary approach that preserves progress made so far, seeks stakeholder input and collaboration, is based on science, and keeps red snapper on the road to recovery.

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

While the Council is developing strategies to reduce red snapper discards, we suggest that it concurrently develop strategies to improve the recreational discard data used in assessments. This should happen before any management measures for future harvest of red snapper are considered. Improving data collection is an essential step that can be taken right away by initiating development of a snapper grouper permit to provide a better estimate of effort in the snapper grouper fishery and allow the Marine Recreational Information Program (MRIP) to better target and survey snapper grouper fishermen. This information could be used to inform the next stock assessment.

The Council should also explore requiring anglers fishing for snapper and grouper to report their catch electronically. This could reduce uncertainty associated with catch and discard estimates. Developing data collection and monitoring tools that take advantage of 21st century technology is essential in helping managers make informed decisions. The Council recently approved a measure to require electronic logbooks for federally-permitted charter boat captains and this reporting requirement could be expanded to include the private recreational sector. There are lessons learned from existing pilot programs that could provide insight into such a program.[12]

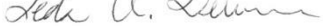
The Council's nascent citizen science program offers a promising way to directly engage fishermen in collecting data that can inform management decisions. We urge the Council to move forward on the proposed "kickstarter" project to collect fishery dependent data on scamp grouper discards via an electronic reporting application. Information on number, length, and disposition of released fish, as well as depth of capture, would allow for more targeted management strategies to reduce bycatch mortality in the future. Lessons learned from this pilot project could then be applied and scaled up to include other species, such as red snapper.

[12] Jiorle et al. (2016). Assessing the Utility of a Smartphone App for Recreational Fishery Catch Data, Fisheries, 41:12, 758-766

Conclusion

We appreciate the Council's efforts to end overfishing of red snapper and develop strategies for long-term sustainability. Difficult times call for difficult decisions and bold measures. Red snapper are an economically and ecologically important species in this region and recovery of this iconic species is critical to our fishing communities and ecosystem. Scientists, managers, and stakeholders will need to work more creatively and collaboratively than ever before. We look forward to continuing to work with you on this and other measures to promote healthy South Atlantic fisheries.

Sincerely,



Leda A. Dunmire
Manager, U.S. Oceans, Southeast

January 24, 2017

Written comment Amendment 43 Atlantic Red Snapper Management options

My name is Captain Jimmy Hull, and I have been commercial fishing the Atlantic Red Snappers for over 41-years out of Ponce de Leon Inlet Florida. Thank you for giving me, as a fisherman the opportunity to provide input about the current Red Snapper stock and management options. The SEDAR 41 Beaufort Assessment Model (BAM) results indicate the Atlantic Red Snapper biomass by age to be at 1975 levels. The BAM results indicates that it is about at one-third of the biomass compared to 1955. As a result, the BAM indicates that the stock is overfished and overfishing is still occurring. Fishermen disagree with this conclusion of the BAM that the biomass is greatly reduced verses the historical record.

During the 1970's, there were no size limits, bag or catch limits for Red Snapper. Then in August 1983, a 12-inch size limit was enacted; then in January 1992 a 20-inch size limit regulation was enacted. Fishermen quickly observed an increased improvement and rebuilding of the Red Snapper stock abundance from the 1990's to the present.

Following the 1992 size regulation implementation fishermen observed several new age classes moving into the population. As a result fishermen began interacting and measuring fish, taking note of their observations of a rebuilding Red Snapper biomass. Fishing was good, environmental factors and new management rules were working. Fishermen and coastal fishing communities were onboard with accurate fisheries science and management.

The original NMFS Red Snapper stock assessment conducted for the SAFMC was completed during 1998 (http://sedarweb.org/docs/wsupp/S41_RD50_Manooch_etal1998.pdf) and indicated that the stock was rebuilding, while responding well to management. Fishermen observations agreed with that conclusion and the improved data validated the results of that assessment. Yet the NMFS Beaufort Lab failed to conduct a continuity run for the original assessment model and instead completely changed to the BAM analysis to start assessing Atlantic Red Snappers.

In 2008, the SEDAR 15 final report indicated that the Red Snapper stock was overfished and overfishing was occurring, with only 500-thousand Red Snapper left in the Western Atlantic Ocean Red Snapper stock. Fisherman were shocked and disagreed and we found these conclusions to be the polar opposite of what we had been observing fishing on the water.

By 2010, SEDAR 24 was completed and that assessment indicated the Red Snapper stock was overfished and overfishing was occurring. The BAM analysts believed the stock had rebuilt just enough to avoid a complete closure of bottom fishing in many areas as shallow as 98-feet of depth out to 240-feet. Fishermen believed that these conclusions again were incorrect and inconsistent with their fishing observations on the water.

Since 2009, fishermen have been committed to working cooperatively with state and federal scientists to produce data to attempt to better inform the BAM model of the abundant and rebuilding Red Snapper stock we've observed on the water.

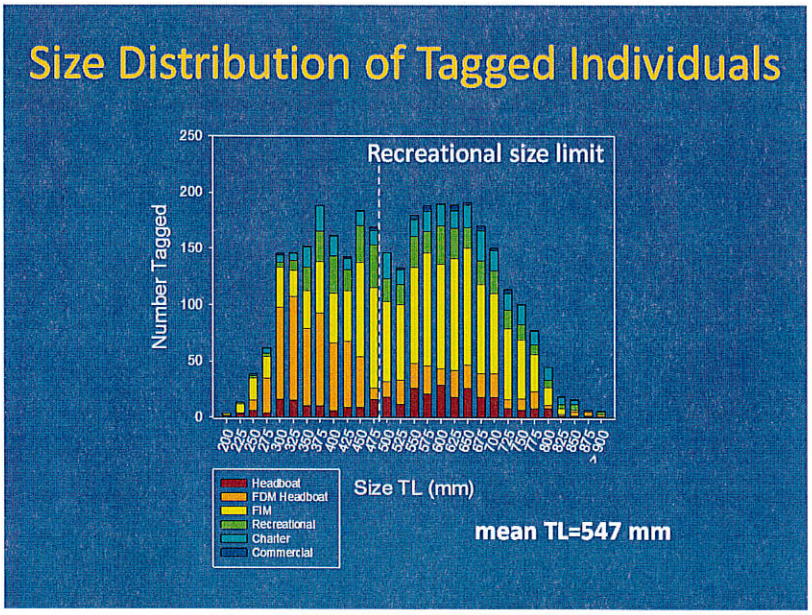
During 2010, fishermen were involved with a cooperative tagging program targeting the Atlantic Red Snapper worked with the State of Florida's Fish and Wildlife Commission (FWC) Fish & Wildlife Research Institute (FWRI) teamed with the Southeastern Fisheries Association (SFA) and the Gulf & South Atlantic Fisheries Foundation (GSAFF). This cooperative fishing effort produced 3340 measured and tagged Red Snappers caught along the east coast of Florida.

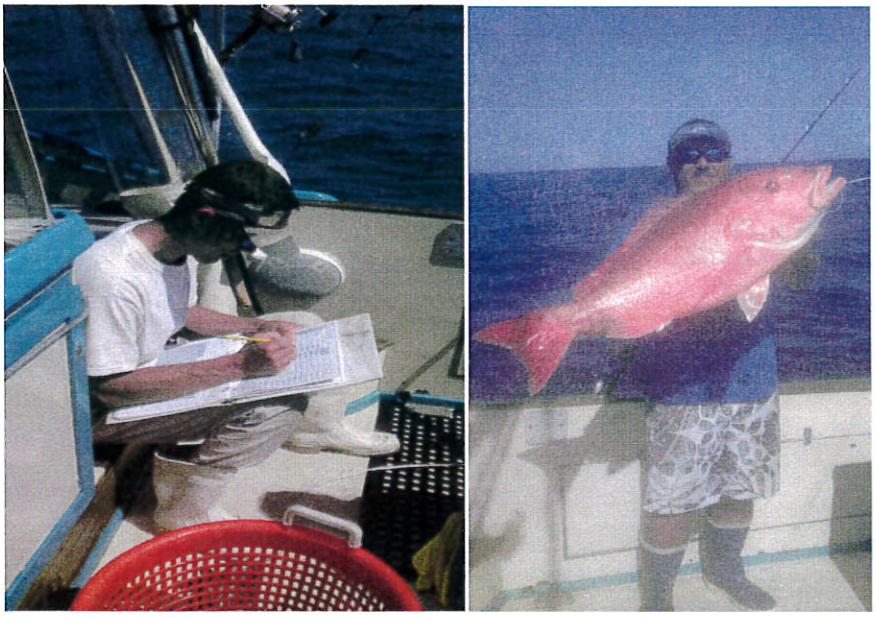
The mean total length (TL) of Red Snapper in this 2010 study was 547-mm (over 21-inches) which indicates the average age of the stock was 4-years old. That was 6-years ago and now the fish in that age class have moved thru the stock and the mean TL has increased significantly and have now became productive 10-year old Red Snappers. These large fish can weigh 20-pounds or more

Fishermen are commenting that they are currently observing and interacting with abundant 800-mm (over 31-inches) in length Red Snapper populations while fishing. This same study indicates many Red Snapper samples out to 900-mm (over 35-inches) in length were caught also. The fish that were 10-years old about six-years ago when this study was conducted are now productive 16-year old Red Snappers, all well over 20-pounds or more in size.

Fishermen agree with the results of the State of Florida data rich intensive Red Snapper study thru the observed data and thru our observation and interactions fishing for the Red Snappers.

<u>Why doesn't the observed data in the BAM model show these older fish?</u>





Fisherman have been cooperatively collecting larger older fish beginning June 2009 with the FWC.

In 2012, a Red Snapper mini-season tournament sampling was conducted by Florida's FWRI scientists. The results of this study (see Figure 27 graph below) show that length frequencies of Red Snapper harvested indicate many Red Snappers were 650-mm and larger out to 880-mm and were more numerous than smaller Red Snappers measuring less than 650-mm in length. This sampling effort is providing observed data points of an increasing biomass of older, larger Red Snappers that are highly productive further adding recruitment to an ever expanding population.

Why doesn't the observed data in the BAM show these older age class fish in the population?

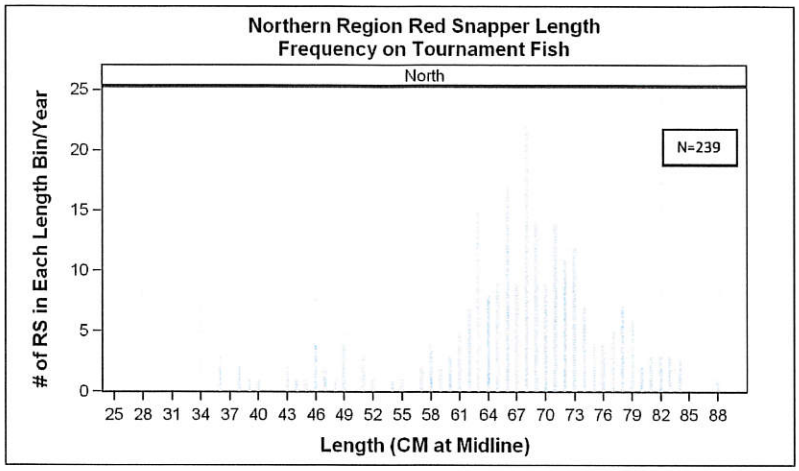
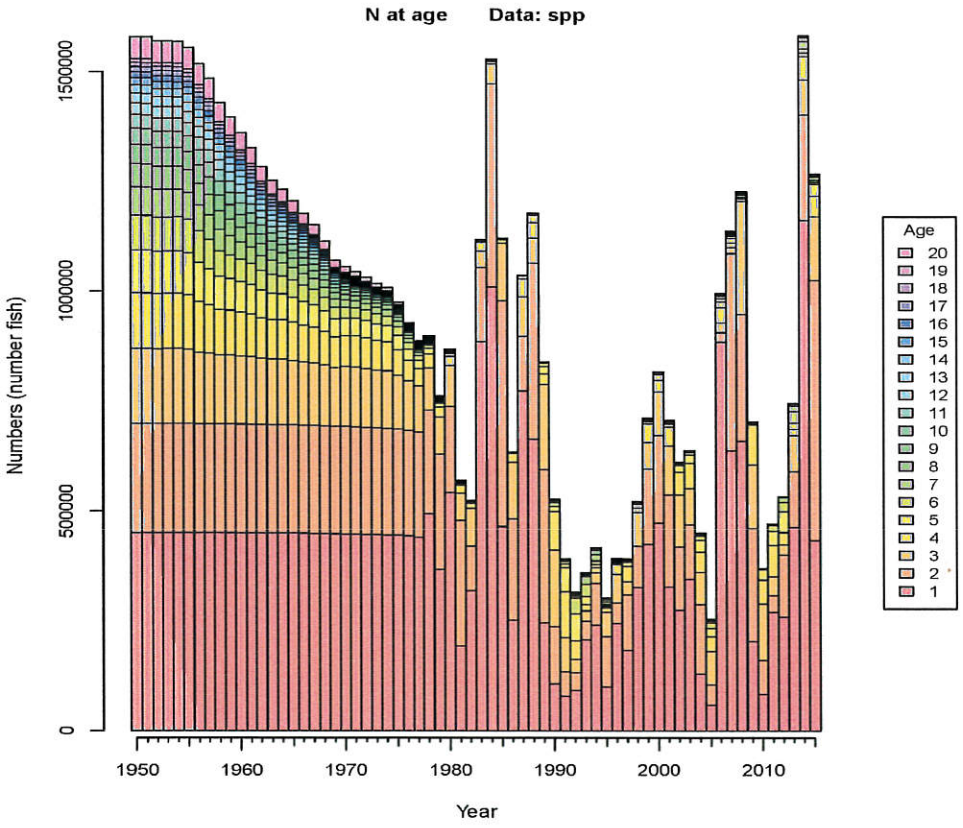


Figure 27. Length frequencies of red snapper from tournament samples (Northern Region). N = Number of observations, Percent = Number expressed as a percentage of overall totals for all inlets in the region. No Tournaments occurred in the Southern Region. Most samples were from Ponce Inlet (236 out of 239 total).

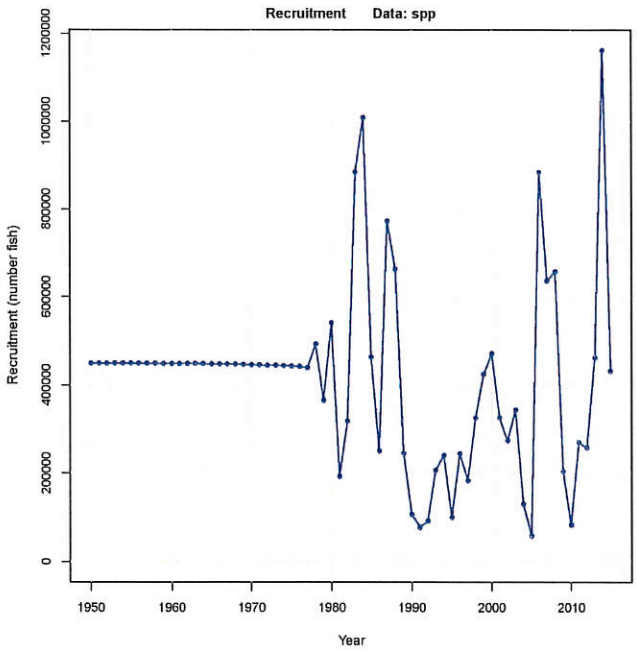
Recreational mini season catch

There has never been more abundant numbers of Red Snapper than at the current time. The SEDAR 41 BAM model indicates this. (see graph below) We agree and the observed data validates this model conclusion. Fishermen have been reporting the increasing abundance for many years, before the results of SEDAR 15, SEDAR 24 and SEDAR 41 were finalized.

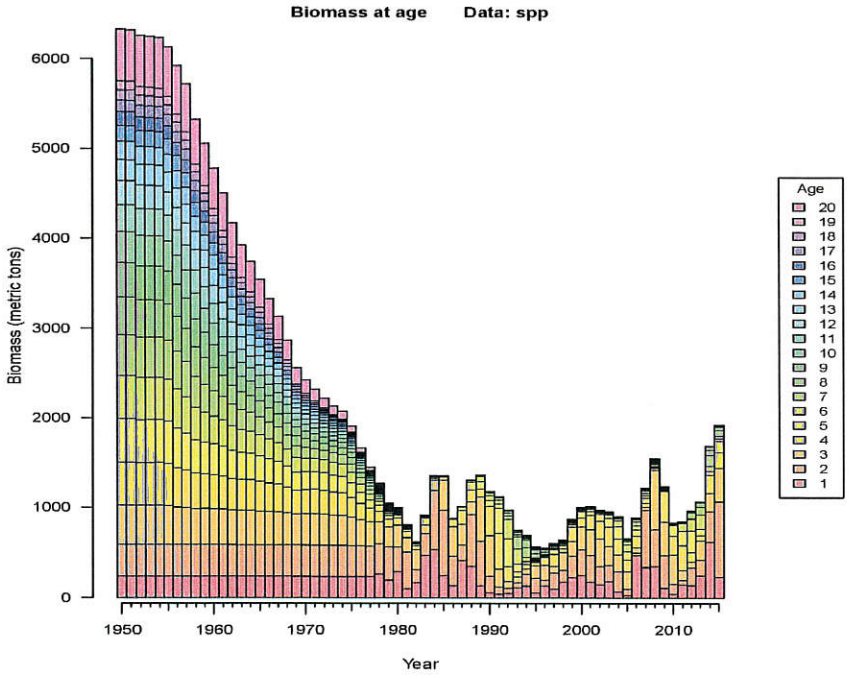


Now we can all agree that the Red Snapper stock abundance as measured in numbers is larger than it has ever been, yet we were are told by the BAM analysts that this stock should be full of 20, 30 and 40-year old fish. Fishermen disagree, and we are advising that in our opinion based on real observations and referencing the frequency graph in numbers of Red Snappers above, that the Red Snapper stock is totally rebuilt both in abundance and historical age structure. The model assumption of the BAM analysts that prior to around 1978, the stock biomass was made up of many metric tons of fish older than 10-years of age is not validated by any observed data or empirical data. The inaccurate assumptions of a huge long lived, older-aged Red Snapper biomass has destroyed the BAM's ability to accurately assess the stock.

The current Red Snapper stock is rebuilt as nature intended it to be. This is a fish stock that is able to reproduce an abundance of new recruits (see graph below) in numbers never observed before. The Atlantic Red Snapper stock high recruitment periods are that of a totally rebuilt stock.



This stock is made up of highly productive, aggressive fish living in a very competitive ocean where they eat and are eaten. Very few Red Snapper will ever survive beyond 20-years of age. That is the way it was prior to 1970's and that is the way it is today forty-six years later. The Red Snapper stock rises and falls in abundance based on recruitment, predation, competition, environmental factors and management. This is not a fish stock hypothetically designed by a model to assume a stock structure of what it never was and never will be, a stock of predominated by 20, 30 and 40-year old Red Snappers.



This incorrect assumption about the historic biomass created by the model with no observed data is why the BAM stock assessment results are so incorrect. The observed data produced by the Florida FWC recent data collection efforts support the perspectives that I have stated above. We believe that the Atlantic Red Snapper stock is fully rebuilt and the SAFMC managers should be given the opportunity to open this fishery back for the American citizens who own it.

Some of the scoping ideas for Amendment 43 are:

. What is the best way to reduce discards to stop overfishing?

. What management measures could improve the survival of discarded Red Snapper?

. What management measures would you like to see used?

. How could estimates of catch, discards and effort in the private recreational sector snapper /grouper fishery be improved?

First the Private Recreational Sector must be made accountable thru permits for those who fish the Snapper/Grouper stock. This will correct the vastly inflated assumptions of dead discards. made by the SEFSC using MRIP.

Second the Private recreational sector should only have a 2 or 3-month Snapper/Grouper fishing season. They fish in the summer months when the weather is good, this would eliminate 9 or 10 months in the winter of Assumed Recreational Dead discards using MRIP.

Third Every vessel that fishes in the Snapper/grouper fishery should be required to have and use descending devises.

. Ways to reduce bycatch by closing areas to snapper grouper fishing and/or establishing a season for snapper grouper fishing.

I do not support and vigorously oppose the creation of areas closed to bottom fishing for the commercial Fisherman Permit holders and the for-Hire Permit holders. Commercial fisherman are currently able to supply the Consumers with other species of reef fish which we can only catch in the depths of areas you would propose to close. Thus, access to other reef fish would be eliminated. We commercial fisherman who fish year round have learned to live without Red Snapper and refuse to give up anything so that we can catch one or two. If the Recreational sector wants to accept closed areas and seasons for bottom fishing for the opportunity to catch one Red Snapper, let them have it for their Sector.

- Ideas for developing and promoting best fishing practices to address barotrauma and reduce bycatch and discard mortality.

Commercial reef fisherman have been avoiding red Snapper since the fishery was closed. We concentrate on Vermillion Snapper, Triggerfish, and Amberjack. We fish up under the

boat 30 to 40 feet below the surface thus avoiding the Massive amounts of Red Snapper close to the bottom. If the Red Snapper come up and find our baits, We Move. Furthermore, I don't believe the Recreational discard numbers are correct. Recreational fisherman are not fishing to catch and release Red Snappers. Everyone should be required to have a descending devise of some type on board if you are reef fishing.

- If the dead discards are reduced sufficiently, explore management measures for commercial and recreational measures during a limited red snapper season.
- Ways to improve the estimate of recreational harvest and discards of snapper grouper species in the private recreational fishery.

The Commercial Sectors Allocation should be managed separately in every way from the Recreational Sector. Until the Recreational sector is made accountable the fishery will never open. The recreational fisherman should be permitted just as the Commercial and For-Hire sectors are. Only then will these massively inflated discard numbers used to close this fishery be corrected.

Amendment 27 Scoping ideas.

. Split seasons

. Trip limits and step downs

. Re-evaluation of shallow water grouper closure.

. Fishing year changes for Golden tile hook and line.

. Removal of minimum size limits for deep water species.

First split season have been shown to work for keeping a fishery open year-round. I support the use of split seasons.

Second trip limits and step downs work for keeping fisheries open year-round. I support the use of trip limits and step downs as long as there is a step – up before the end of season to utilize the full ACL if fish are available.

Third I believe we should have a rolling special closure for shallow water grouper.

Fourth I believe the Golden Tile hook and line season should start after the Long line season ends.

Fifth I support the removal of size limits for deep water species.

I support the removal of Almaco jack from the jacks complex.

I support the reduction of Size limit of Grey triggerfish in federal waters off of Florida to 12 inches TL.

I support the reduction of size limit of Black Seabass for the recreational sector to 11 inches.

Since 2009 the belief of Fisherman in My community was that SCIENCE WOULD SET US FREE!
Along with TRANSPARENCY, FLEXIBILITY there was a future for a growing long term Sustainable Commercial Fishing Industry in the South Atlantic Region. In fact, many of us Commercial Fisherman committed ourselves to providing all we had in an effort to inform Fisheries SCIENCE and stock assessments. Along the way and until the last several months and assessments and SSC meetings We felt our efforts were making a difference.
Now in 2017 Its clear that Science will not set us free and that in fact. Science is now a weapon to eliminate the Commercial Fishing Industry.
The use of highly data dependent complex age models like BAM and now with new and even more complex formulas being added to the assessment models they have produced unexplainable results even further from the reality of what We interact with on the Ocean. Remember when simple production models where estimating our stocks. They represented reality as seen on the water, an Example is the recent SEDAR 41 Red Snapper Production model results of a rebuilt fishery compared to the BAM solution.
The Science could not be any worse than it is right now. They have thrown the compass overboard and the electronics have failed. They are lost.
We Fisherman are not the only ones to believe this.
About a year ago, one of the very highest ranking NOAA officials in the South Atlantic told us that the Science would never get any better than it was at that time.
And that we better like the assessments we are getting now, because in the future we may not like what is produced.
After attending the first DATA workshop ever by any Fisherman and involvement in assessments DWs, RWs, SSC meetings etc.
I agree.
It appears that every future stock assessment on every species will produce results of much smaller BIOMASS estimates than previous assessments.
This will result in lower catch limits, shorter seasons and even more restrictive management. Just like what is being scoped today.
This despite all of the efforts of fishery closures, size limits, gear restrictions and every management idea imaginable we are losing ground going backwards.

Now all we see to do is try and keep what fisheries we have left, try to stop the bleeding. Just Survive. We are very upset and frustrated with every growing federal fisheries Bureaucracy that now owns our fisheries for their benefit and expansion and their job security.

I have never been one to give up on any challenges facing me in my life. And that is why I have been successful in the Fishing business.
However I have never seen a more complex mess made of assessing and Managing, something that can be seen with your own eyes .In Business I learned to Simplify processes that I could not measure, control or see with my own Eyes.
There is a lot to be gained by keeping Science and Management SIMPLE.

Captain Jimmy Hull
F/V Sea Lover, F/V Denise Ann,
SAFMC Snapper-Grouper (SG) AP member, SAFMC SEDAR Pool member, SAFMC Citizen Scientist, MARFIN panel member, BDTRT member

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 Action1, 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 disproportionally 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
1001 N. Fairfax Street, Suite 501, Alexandria, VA 22314 • 703-519-9691 • Fax: 703-519-1872
Web: www.ASAFishing.org • Email: info@ASAFishing.org

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

Captain William R. Hoge
Sea Love Charters
220 Nix Boat Yard Road
St. Augustine, FL 32084

February 3, 2017

To the South Atlantic Fishery Management Council,

My name is Captain William R. Hoge, and I am writing this comment in regards to Snapper Grouper Amendment 43. I graduated from the University of Miami in 1987 with a double major in Marine Science/Biology. For the first nine years after graduation, I worked as an environmental consultant to the United States Air Force (USAF). One of my tasks for the USAF was the writing and implementation of fish and wildlife plans. I currently live in St. Augustine, FL and for the past 20 years I have fished the offshore waters of Northeast Florida as a deckhand, commercial fisherman and captain. In January of 2005, I purchased Sea Love Charters.

Sea Love Charters has been part of St. Augustine since 1980 and part of Daytona since the 1960's. The Sea Love Charter fleet consists of "Sea Love II", a 70' party boat with a 60 passenger capacity, the "Sea Love III", a 50' party boat that holds 35 passengers, and "Reel Therapy", a 40' six pack sport boat. Last year, Sea Love Charters took approximately 40,000 people fishing. It is a safe and economical way for people to enjoy deep sea fishing.

I recently attended the January 23 meeting in Jacksonville, FL and sat through the scoping presentation for Amendment 43 by Mr. Chip Collier. I will address each of the four issues the council wants input on, but before I do, I would first like to reiterate what every commercial, recreational and for hire fisherman and diver in the room was saying, there is an abundance of red snapper off our coast.

There are so many red snapper that they have become a nuisance and there is no way to avoid catching them. Every spot is covered with them including those well inshore that never had them before. In fact, before the engines are turned off, a pack of 20 pound plus fish will swim to the boat. Speaking with divers, the bottom is also covered with red snapper along with the invasive lionfish. Red snapper are very voracious, and I am sure that they devour every juvenile snapper, seabass, grouper, porgy, lobster, and crab they can find. A ten pound mangrove snapper was recently caught that had four small sea turtles in its stomach, so it is not hard to imagine what damage these snapper can do to the turtle population. The grouper have long ago left our waters because there is no forage left for them. We literally only catch several keeper grouper per year. There is no denying the fact the red snapper population has exploded off our coast and has had a severe impact on the rest of the marine ecosystem.

As for the first point: What is the best way to reduce discards of red snapper to stop overfishing (as required by law)? The best way to reduce discards is to amend the model of discard mortality estimates used in the SEDAR 41 of 28.5%. As everyone in that meeting voiced, that percentage is way too high. We take very good care of our caught fish before release, and very rarely do we have a fish float off. Of course there are plenty of other ways for the fish to die, but almost every fish is released healthy. Florida Fish and Wildlife Conservation Commission (FWC) biologists regularly accompany us on trips and meticulously note the condition of every fish released. The SAFMC must review this data. I know fishing and release conditions vary across the fishing spectrum, but this data is very valuable, and it exists in the heart of the red snapper population.

The second point is what management measures could improve the survival of discarded red snapper? We do everything we can to ensure the survival of caught red snapper. If possible, the recreational angler could possibly use more education on the handling of caught fish. Other than not fishing for them, there is not much more that can be done.

The third point asked by the SAFMC is if red snapper removals (landings and dead discards) are reduced significantly, limited harvest may be possible. What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed? There is no reason to even answer this question because the SAFMC has no intentions of opening the red snapper season. It is an obvious fact that the more snapper there are, the more the discards there will be, and there will never be a feasible way to reduce the number of caught and released fish to less than 250,000. This is the point where the SAFMC loses their credibility to the fishing public. What is the point of asking this question other than providing false hope to the fisherman who relies on this species for a living?

What are potential ways to reduce the number of discarded red snapper? After stating the above facts, the only logical answer and conclusion that should never be allowed to happen is to close the ocean to fishing. This whole Amendment 43 sounds like a political stunt concocted by small interest groups and leaders. The SAFMC has already failed in the past with Amendment 17A to set area closures aside. The FWC, our Florida Congressmen, the tourist industry, and 99.9% of fisherman were against it. With the new administration in Washington, I cannot imagine a closure would even be allowed to happen. If proposed, myself, every fisherman, diver, the FWC, and those that rely on tourism will oppose it. Please do not waste the resources of the taxpayer to fight something that does not need fixing.

The SAFMC has acknowledged that the red snapper population has almost quadrupled since 1991, and after talking with Mr. Collier, it seems that this growth has mainly occurred off the Northeast Florida coast. Mr. Collier maintains that the red snapper population is still down in the more southern and northern habitats, but this may be how the population dynamics will remain. It is my suggestion to manage the red snapper population in separate zones. Allow a red snapper season from South Carolina to Cape Canaveral to ease the burden on the ecosystem and continue the closure in the other areas.

I personally do not care if the red snapper season is ever opened or indefinitely closed even though many fishermen would rightfully disagree. People enjoy just being on the water wetting a line, and they will always continue to do so. It is fun to see the large fish swim up to the boat, and a customer enjoys the opportunity to fight a 20 pound plus trophy fish. A memorable photograph of the catch is all the customer needs, but you always hear the incessant questions of why do they have to release it when there are so many. The only thing we ask is please do not close the ocean to fishing. So much depends on that. If you have any questions, I can be reached at (904) 501-2158.

Sincerely,

William R. Hoge
President, Sea Love Charters

February 10, 2017

Dr. Michelle Duval
Chairman, South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
Charleston, SC 29405

Re: Scoping for Snapper Grouper Amendment 43 (Red Snapper and Recreational Reporting)

Dear Dr. Duval,

On behalf of The Pew Charitable Trusts, please accept these comments during the scoping phase of Amendment 43 to the Snapper Grouper Fishery Management Plan. The South Atlantic Fishery Management Council (Council) should develop management actions that end overfishing of red snapper as soon as possible to allow a sustainable fishery for the long term. In consideration of the four questions provided in the scoping document,[1] we suggest the following:

Question 1: What are potential ways to reduce the number of discarded red snapper?

- Conduct a robust analysis of seasonal and spatial management options, or a combination thereof, that reduce dead red snapper discards sufficiently to end overfishing.

Question 2: What are measures that could improve the survival of discarded red snapper?

- Request research to determine whether and to what extent descending devices may be a viable part of South Atlantic red snapper management plans.

Question 3: What management measures would you like to see used to manage red snapper harvest if a limited red snapper season is allowed?

- Implement new measures to help reduce discards, improve discard mortality, and provide better recreational data before any directed fishing for red snapper is allowed.

Question 4: What are the best ways to improve the estimates of catch, discards, and effort in the private recreational snapper grouper fishery?

- Develop a snapper grouper permit to provide a better estimate of effort in the snapper grouper fishery and allow for more targeted surveys;
- Explore mandatory electronic reporting for members of the private recreational sector fishing for snapper and grouper; and
- Conduct a citizen science project to collect discard data on scamp grouper for use in the 2018 scamp stock assessment and as a pilot project for other species, such as red snapper.

[1] SAFMC (2017) Scoping Document: Amendment 43 to the Snapper Grouper Fishery Management Plan of the South Atlantic Region. Available online at: http://safmc.net/download/Amendment43_ScopingDoc.pdf.

Background

A 2016 stock assessment of red snapper indicates that this economically and ecologically important species is still overfished and undergoing overfishing.[2] The good news is that the assessment estimates that since 2010, the South Atlantic population has been increasing at a modest rate and is now at levels comparable to those in the 1970s.

This is consistent with the increased number of red snapper that fishermen report observing on the water. However, despite the red snapper fishing moratorium established by the Council in Amendment 17A,[3] the assessment finds that the population is still below a healthy level, with too few of the older and bigger fish needed for long term sustainability. These findings indicate that the population is rebuilding, but it will take more than 6 years to rebuild a species that can live 50 years or more.[4] Recovery will be slow and steady.

A major obstacle on the red snapper road to recovery is the large number of discards and the poor survival rates of released fish. In 2014 and 2015, the average number of dead red snapper discards eclipsed 200,000 fish. This is four times the Science and Statistical Committee (SSC) recommended allowable biological catch for 2017.[5] As red snapper continues to recover and abundance increases, encounters and incidental catches are likely to increase as well. Thus, red snapper recovery depends as much on the right rules for all snapper and grouper fishing as it does on proper rules for fishing for red snapper itself.

In light of the science, we offer the following response to the questions in the scoping document:

1. What are potential ways to reduce the number of discarded red snapper?

Overfishing of red snapper continues because of the large number of dead discards. Reducing discards will require a sufficient reduction in fishing effort and red snapper removals to address the scale of the problem. This could potentially be achieved through seasonal and/or spatial management measures. There are several potential strategies that are worth further Council evaluation and analysis.

One option we encourage the Council to investigate is a recreational deep water snapper grouper fishing season. Such a season would give fishermen the opportunity to fish during a specified time period and keep catch within the allowable limits. During the "off-season" there would be no fishing pressure, reducing the number of red snapper that are discarded. While this is a promising approach, more analysis needs to be done to know if it is scientifically feasible to meet the goal of reducing the number of red snapper discards enough to end overfishing.

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[2] SEDAR (2016). SEDAR 41 – South Atlantic Red Snapper Assessment Report. SEDAR, North Charleston SC. 660 pp. available online at: http://sedarweb.org/sedar-41.

[3] SAFMC (2010). Amendment 17A to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region. Available online at: http://www.safmc.net/Library/pdf/Amend17Afinal071910.pdf

[4] Felicia C. Coleman et al. (2000). Long-lived reef fishes: the grouper-snapper complex. Fisheries 25: 14-20

[5] SAFMC (2016). Options Paper: Amendment 43 to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region. Online briefing book for the December 5-9, 2016 meeting of the SAFMC Snapper Grouper Committee, Attachment A10a.

We also encourage the Council to examine targeted areas where fishing for snapper and grouper could be allowed. These areas could be in shallower waters where barotrauma is less of a concern and released fish are more likely to survive.[6] If strategically located, these areas may reduce the number of red snapper discards enough to allow for fishing for other snapper and grouper to continue while still rebuilding red snapper. Scientific analysis should determine whether this approach will be feasible, and if so, the location and size of any potential shallow water snapper grouper fishing areas.

Implementing either one or a combination of seasonal and spatial management involves trade-offs and will require thoughtful input from the fishing community. We recognize that any large fishing closure is not a popular option. In order to comply with the Magnuson-Stevens Act (MSA) requirement to end overfishing, the number of discards will need to be greatly reduced. A robust analysis of the options that reduce dead red snapper discards sufficiently to end overfishing and their impacts to fishing communities should be conducted.

2. What management measures could improve the survival of discarded red snapper?

Discard mortality is a significant concern. During capture, red snapper are often brought to the surface quickly from deep depths resulting in barotrauma, including ruptured swim bladders, bloating and protrusions of stomachs, intestines and eyes.[7] The impacts can be lethal. The recent stock assessment estimates that 28.5% of recreationally discarded red snapper and 38% of commercially discarded die.[8]

Recently, there has been research done on the use of descending devices as a means to improve survivability of discarded fish, although data on their efficacy in helping red snapper in the South Atlantic to survive is scarce. During the December 2016 Council meeting in Atlantic Beach, NC, graduate student Brendan Runde, of North Carolina State University, presented results of a study that showed that the use of a SeaQualizer resulted in 60-90% survival rates for other deep water species, including snowy grouper, scamp grouper, and speckled hind.[9] Other studies have shown similarly positive results for red snapper in the Gulf of Mexico, but the applicability of these studies to red snapper in the South Atlantic is unknown.[10, 11]

As a follow-up to these promising outcomes, the Council should request research to determine whether and to what extent descending devices may be a viable part of South Atlantic red

[6] Curtis et al. (2015). Quantifying Delayed Mortality from Barotrauma Impairment in Discarded Red Snapper Using Acoustic Telemetry. Marine and Coastal Fisheries 7(1): 434-449.
[7] Drumhiller et al (2014). Venting or Rapid Recompression Increase Survival and Improve Recovery of Red Snapper with Barotrauma. Marine and Coastal Fisheries, 6(1): 190-199.
[8] SEDAR (2016). SEDAR 41 – South Atlantic Red Snapper Assessment Report. SEDAR, North Charleston SC. 660 pp. available online at: http://sedarweb.org/sedar-41.
[9] SAFMC (2016). Online briefing book for the December 5-9, 2016 meeting of the SAFMC: Snapper Grouper Committee, Attachment A03.
[10] Curtis et al. (2015). Quantifying Delayed Mortality from Barotrauma Impairment in Discarded Red Snapper Using Acoustic Telemetry. Marine and Coastal Fisheries 7(1): 434-449.
[11] Drumhiller et al (2014). Venting or Rapid Recompression Increase Survival and Improve Recovery of Red Snapper with Barotrauma. Marine and Coastal Fisheries, 6(1): 190-199.

snapper management plans. If the results are favorable and these devices are to be incorporated into management, science advisors should identify a plan to quantify changes in the overall discard mortality rates used when calculating total removals each year.

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

Before any directed fishing for red snapper is allowed, new measures are needed to help reduce discards, improve discard mortality, and provide better recreational data as described elsewhere in this letter. When a directed fishery can legally be allowed under the MSA, we urge the Council to take a precautionary approach that preserves progress made so far, seeks stakeholder input and collaboration, is based on science, and keeps red snapper on the road to recovery.

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

While the Council is developing strategies to reduce red snapper discards, we suggest that it concurrently develop strategies to improve the recreational discard data used in assessments. This should happen before any management measures for future harvest of red snapper are considered. Improving data collection is an essential step that can be taken right away by initiating development of a snapper grouper permit to provide a better estimate of effort in the snapper grouper fishery and allow the Marine Recreational Information Program (MRIP) to better target and survey snapper grouper fishermen. This information could be used to inform the next stock assessment.

The Council should also explore requiring anglers fishing for snapper and grouper to report their catch electronically. This could reduce uncertainty associated with catch and discard estimates. Developing data collection and monitoring tools that take advantage of 21st century technology is essential in helping managers make informed decisions. The Council recently approved a measure to require electronic logbooks for federally-permitted charter boat captains and this reporting requirement could be expanded to include the private recreational sector. There are lessons learned from existing pilot programs that could provide insight into such a program.[12]

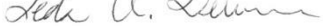
The Council's nascent citizen science program offers a promising way to directly engage fishermen in collecting data that can inform management decisions. We urge the Council to move forward on the proposed "kickstarter" project to collect fishery dependent data on scamp grouper discards via an electronic reporting application. Information on number, length, and disposition of released fish, as well as depth of capture, would allow for more targeted management strategies to reduce bycatch mortality in the future. Lessons learned from this pilot project could then be applied and scaled up to include other species, such as red snapper.

[12] Jiorle et al. (2016). Assessing the Utility of a Smartphone App for Recreational Fishery Catch Data, Fisheries, 41:12, 758-766

Conclusion

We appreciate the Council's efforts to end overfishing of red snapper and develop strategies for long-term sustainability. Difficult times call for difficult decisions and bold measures. Red snapper are an economically and ecologically important species in this region and recovery of this iconic species is critical to our fishing communities and ecosystem. Scientists, managers, and stakeholders will need to work more creatively and collaboratively than ever before. We look forward to continuing to work with you on this and other measures to promote healthy South Atlantic fisheries.

Sincerely,



Leda A. Dunmire
Manager, U.S. Oceans, Southeast

January 24, 2017

Written comment Amendment 43 Atlantic Red Snapper Management options

My name is Captain Jimmy Hull, and I have been commercial fishing the Atlantic Red Snappers for over 41-years out of Ponce de Leon Inlet Florida. Thank you for giving me, as a fisherman the opportunity to provide input about the current Red Snapper stock and management options. The SEDAR 41 Beaufort Assessment Model (BAM) results indicate the Atlantic Red Snapper biomass by age to be at 1975 levels. The BAM results indicates that it is about at one-third of the biomass compared to 1955. As a result, the BAM indicates that the stock is overfished and overfishing is still occurring. Fishermen disagree with this conclusion of the BAM that the biomass is greatly reduced verses the historical record.

During the 1970's, there were no size limits, bag or catch limits for Red Snapper. Then in August 1983, a 12-inch size limit was enacted; then in January 1992 a 20-inch size limit regulation was enacted. Fishermen quickly observed an increased improvement and rebuilding of the Red Snapper stock abundance from the 1990's to the present.

Following the 1992 size regulation implementation fishermen observed several new age classes moving into the population. As a result fishermen began interacting and measuring fish, taking note of their observations of a rebuilding Red Snapper biomass. Fishing was good, environmental factors and new management rules were working. Fishermen and coastal fishing communities were onboard with accurate fisheries science and management.

The original NMFS Red Snapper stock assessment conducted for the SAFMC was completed during 1998 (http://sedarweb.org/docs/wsupp/S41_RD50_Manooch_etal1998.pdf) and indicated that the stock was rebuilding, while responding well to management. Fishermen observations agreed with that conclusion and the improved data validated the results of that assessment. Yet the NMFS Beaufort Lab failed to conduct a continuity run for the original assessment model and instead completely changed to the BAM analysis to start assessing Atlantic Red Snappers.

In 2008, the SEDAR 15 final report indicated that the Red Snapper stock was overfished and overfishing was occurring, with only 500-thousand Red Snapper left in the Western Atlantic Ocean Red Snapper stock. Fisherman were shocked and disagreed and we found these conclusions to be the polar opposite of what we had been observing fishing on the water.

By 2010, SEDAR 24 was completed and that assessment indicated the Red Snapper stock was overfished and overfishing was occurring. The BAM analysts believed the stock had rebuilt just enough to avoid a complete closure of bottom fishing in many areas as shallow as 98-feet of depth out to 240-feet. Fishermen believed that these conclusions again were incorrect and inconsistent with their fishing observations on the water.

Since 2009, fishermen have been committed to working cooperatively with state and federal scientists to produce data to attempt to better inform the BAM model of the abundant and rebuilding Red Snapper stock we've observed on the water.

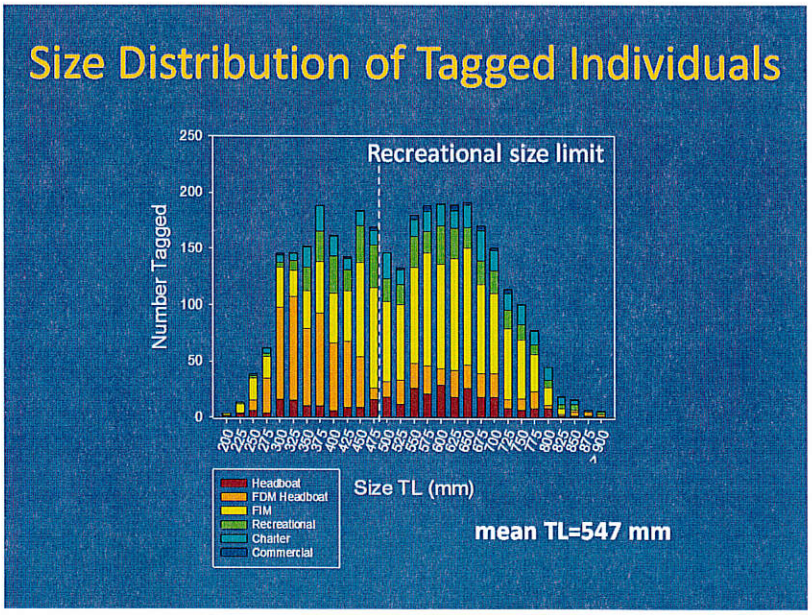
During 2010, fishermen were involved with a cooperative tagging program targeting the Atlantic Red Snapper worked with the State of Florida's Fish and Wildlife Commission (FWC) Fish & Wildlife Research Institute (FWRI) teamed with the Southeastern Fisheries Association (SFA) and the Gulf & South Atlantic Fisheries Foundation (GSAFF). This cooperative fishing effort produced 3340 measured and tagged Red Snappers caught along the east coast of Florida.

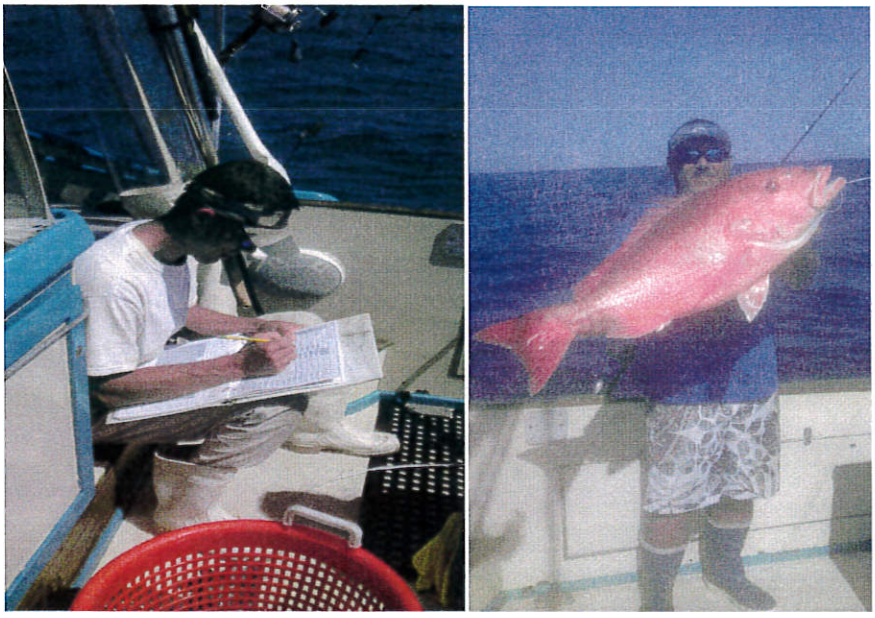
The mean total length (TL) of Red Snapper in this 2010 study was 547-mm (over 21-inches) which indicates the average age of the stock was 4-years old. That was 6-years ago and now the fish in that age class have moved thru the stock and the mean TL has increased significantly and have now became productive 10-year old Red Snappers. These large fish can weigh 20-pounds or more

Fishermen are commenting that they are currently observing and interacting with abundant 800-mm (over 31-inches) in length Red Snapper populations while fishing. This same study indicates many Red Snapper samples out to 900-mm (over 35-inches) in length were caught also. The fish that were 10-years old about six-years ago when this study was conducted are now productive 16-year old Red Snappers, all well over 20-pounds or more in size.

Fishermen agree with the results of the State of Florida data rich intensive Red Snapper study thru the observed data and thru our observation and interactions fishing for the Red Snappers.

<u>Why doesn't the observed data in the BAM model show these older fish?</u>





Fisherman have been cooperatively collecting larger older fish beginning June 2009 with the FWC.

In 2012, a Red Snapper mini-season tournament sampling was conducted by Florida's FWRI scientists. The results of this study (see Figure 27 graph below) show that length frequencies of Red Snapper harvested indicate many Red Snappers were 650-mm and larger out to 880-mm and were more numerous than smaller Red Snappers measuring less than 650-mm in length. This sampling effort is providing observed data points of an increasing biomass of older, larger Red Snappers that are highly productive further adding recruitment to an ever expanding population.

Why doesn't the observed data in the BAM show these older age class fish in the population?

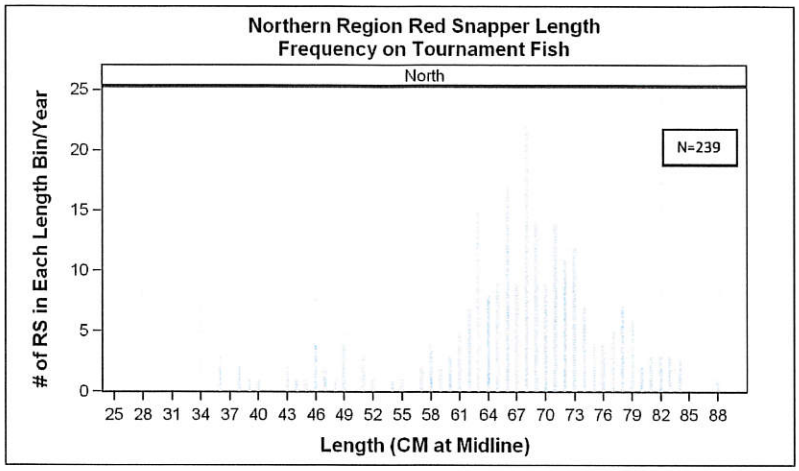
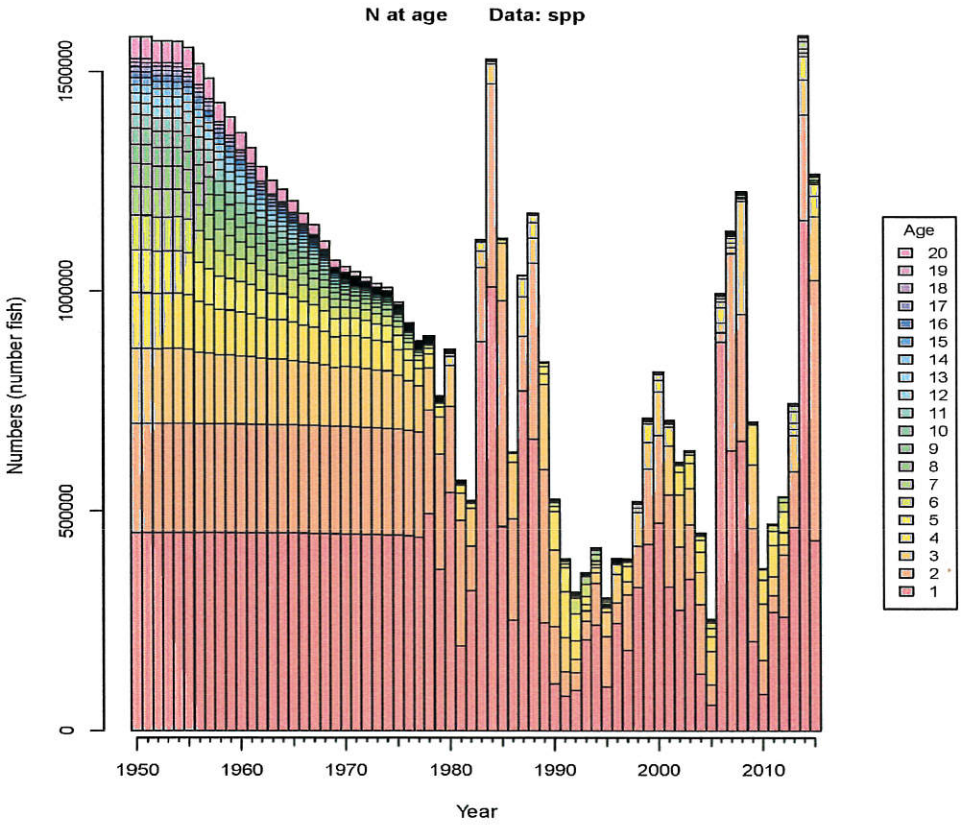


Figure 27. Length frequencies of red snapper from tournament samples (Northern Region). N = Number of observations, Percent = Number expressed as a percentage of overall totals for all inlets in the region. No Tournaments occurred in the Southern Region. Most samples were from Ponce Inlet (236 out of 239 total).

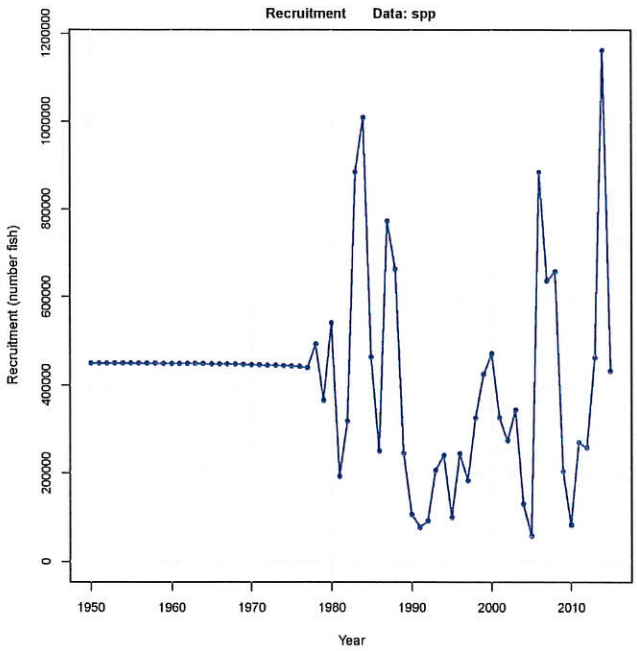
Recreational mini season catch

There has never been more abundant numbers of Red Snapper than at the current time. The SEDAR 41 BAM model indicates this. (see graph below) We agree and the observed data validates this model conclusion. Fishermen have been reporting the increasing abundance for many years, before the results of SEDAR 15, SEDAR 24 and SEDAR 41 were finalized.

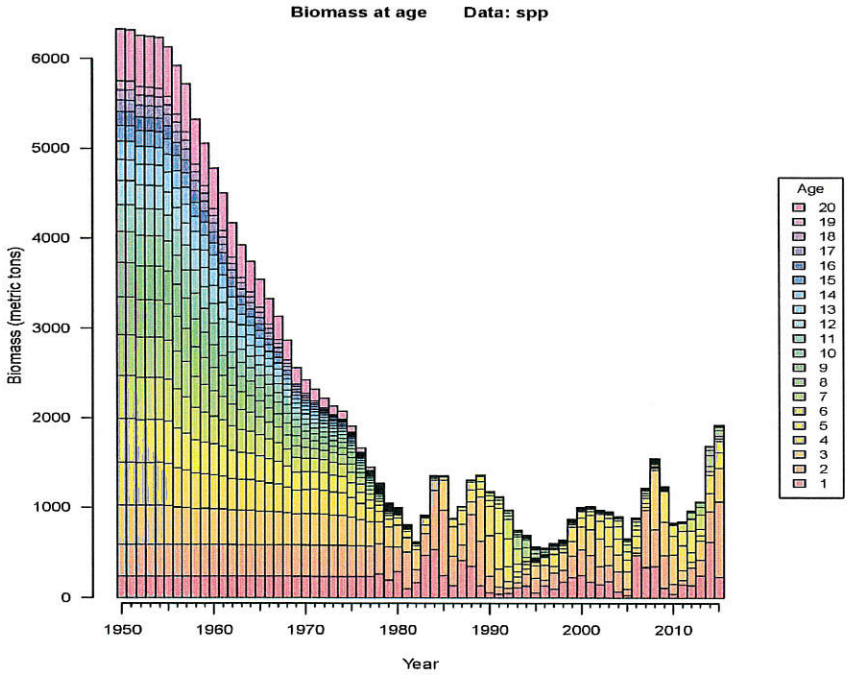


Now we can all agree that the Red Snapper stock abundance as measured in numbers is larger than it has ever been, yet we were are told by the BAM analysts that this stock should be full of 20, 30 and 40-year old fish. Fishermen disagree, and we are advising that in our opinion based on real observations and referencing the frequency graph in numbers of Red Snappers above, that the Red Snapper stock is totally rebuilt both in abundance and historical age structure. The model assumption of the BAM analysts that prior to around 1978, the stock biomass was made up of many metric tons of fish older than 10-years of age is not validated by any observed data or empirical data. The inaccurate assumptions of a huge long lived, older-aged Red Snapper biomass has destroyed the BAM's ability to accurately assess the stock.

The current Red Snapper stock is rebuilt as nature intended it to be. This is a fish stock that is able to reproduce an abundance of new recruits (see graph below) in numbers never observed before. The Atlantic Red Snapper stock high recruitment periods are that of a totally rebuilt stock.



This stock is made up of highly productive, aggressive fish living in a very competitive ocean where they eat and are eaten. Very few Red Snapper will ever survive beyond 20-years of age. That is the way it was prior to 1970's and that is the way it is today forty-six years later. The Red Snapper stock rises and falls in abundance based on recruitment, predation, competition, environmental factors and management. This is not a fish stock hypothetically designed by a model to assume a stock structure of what it never was and never will be, a stock of predominated by 20, 30 and 40-year old Red Snappers.



This incorrect assumption about the historic biomass created by the model with no observed data is why the BAM stock assessment results are so incorrect. The observed data produced by the Florida FWC recent data collection efforts support the perspectives that I have stated above. We believe that the Atlantic Red Snapper stock is fully rebuilt and the SAFMC managers should be given the opportunity to open this fishery back for the American citizens who own it.

Some of the scoping ideas for Amendment 43 are:

. What is the best way to reduce discards to stop overfishing?

. What management measures could improve the survival of discarded Red Snapper?

. What management measures would you like to see used?

. How could estimates of catch, discards and effort in the private recreational sector snapper /grouper fishery be improved?

First the Private Recreational Sector must be made accountable thru permits for those who fish the Snapper/Grouper stock. This will correct the vastly inflated assumptions of dead discards. made by the SEFSC using MRIP.

Second the Private recreational sector should only have a 2 or 3-month Snapper/Grouper fishing season. They fish in the summer months when the weather is good, this would eliminate 9 or 10 months in the winter of Assumed Recreational Dead discards using MRIP.

Third Every vessel that fishes in the Snapper/grouper fishery should be required to have and use descending devises.

. Ways to reduce bycatch by closing areas to snapper grouper fishing and/or establishing a season for snapper grouper fishing.

I do not support and vigorously oppose the creation of areas closed to bottom fishing for the commercial Fisherman Permit holders and the for-Hire Permit holders. Commercial fisherman are currently able to supply the Consumers with other species of reef fish which we can only catch in the depths of areas you would propose to close. Thus, access to other reef fish would be eliminated. We commercial fisherman who fish year round have learned to live without Red Snapper and refuse to give up anything so that we can catch one or two. If the Recreational sector wants to accept closed areas and seasons for bottom fishing for the opportunity to catch one Red Snapper, let them have it for their Sector.

- Ideas for developing and promoting best fishing practices to address barotrauma and reduce bycatch and discard mortality.

Commercial reef fisherman have been avoiding red Snapper since the fishery was closed. We concentrate on Vermillion Snapper, Triggerfish, and Amberjack. We fish up under the

boat 30 to 40 feet below the surface thus avoiding the Massive amounts of Red Snapper close to the bottom. If the Red Snapper come up and find our baits, We Move. Furthermore, I don't believe the Recreational discard numbers are correct. Recreational fisherman are not fishing to catch and release Red Snappers. Everyone should be required to have a descending devise of some type on board if you are reef fishing.

- If the dead discards are reduced sufficiently, explore management measures for commercial and recreational measures during a limited red snapper season.
- Ways to improve the estimate of recreational harvest and discards of snapper grouper species in the private recreational fishery.

The Commercial Sectors Allocation should be managed separately in every way from the Recreational Sector. Until the Recreational sector is made accountable the fishery will never open. The recreational fisherman should be permitted just as the Commercial and For-Hire sectors are. Only then will these massively inflated discard numbers used to close this fishery be corrected.

Amendment 27 Scoping ideas.

. Split seasons

. Trip limits and step downs

. Re-evaluation of shallow water grouper closure.

. Fishing year changes for Golden tile hook and line.

. Removal of minimum size limits for deep water species.

First split season have been shown to work for keeping a fishery open year-round. I support the use of split seasons.

Second trip limits and step downs work for keeping fisheries open year-round. I support the use of trip limits and step downs as long as there is a step – up before the end of season to utilize the full ACL if fish are available.

Third I believe we should have a rolling special closure for shallow water grouper.

Fourth I believe the Golden Tile hook and line season should start after the Long line season ends.

Fifth I support the removal of size limits for deep water species.

I support the removal of Almaco jack from the jacks complex.

I support the reduction of Size limit of Grey triggerfish in federal waters off of Florida to 12 inches TL.

I support the reduction of size limit of Black Seabass for the recreational sector to 11 inches.

Since 2009 the belief of Fisherman in My community was that SCIENCE WOULD SET US FREE!
Along with TRANSPARENCY, FLEXIBILITY there was a future for a growing long term Sustainable Commercial Fishing Industry in the South Atlantic Region. In fact, many of us Commercial Fisherman committed ourselves to providing all we had in an effort to inform Fisheries SCIENCE and stock assessments. Along the way and until the last several months and assessments and SSC meetings We felt our efforts were making a difference.
Now in 2017 Its clear that Science will not set us free and that in fact. Science is now a weapon to eliminate the Commercial Fishing Industry.
The use of highly data dependent complex age models like BAM and now with new and even more complex formulas being added to the assessment models they have produced unexplainable results even further from the reality of what We interact with on the Ocean. Remember when simple production models where estimating our stocks. They represented reality as seen on the water, an Example is the recent SEDAR 41 Red Snapper Production model results of a rebuilt fishery compared to the BAM solution.
The Science could not be any worse than it is right now. They have thrown the compass overboard and the electronics have failed. They are lost.
We Fisherman are not the only ones to believe this.
About a year ago, one of the very highest ranking NOAA officials in the South Atlantic told us that the Science would never get any better than it was at that time.
And that we better like the assessments we are getting now, because in the future we may not like what is produced.
After attending the first DATA workshop ever by any Fisherman and involvement in assessments DWs, RWs, SSC meetings etc.
I agree.
It appears that every future stock assessment on every species will produce results of much smaller BIOMASS estimates than previous assessments.
This will result in lower catch limits, shorter seasons and even more restrictive management. Just like what is being scoped today.
This despite all of the efforts of fishery closures, size limits, gear restrictions and every management idea imaginable we are losing ground going backwards.

Now all we see to do is try and keep what fisheries we have left, try to stop the bleeding. Just Survive. We are very upset and frustrated with every growing federal fisheries Bureaucracy that now owns our fisheries for their benefit and expansion and their job security.

I have never been one to give up on any challenges facing me in my life. And that is why I have been successful in the Fishing business.
However I have never seen a more complex mess made of assessing and Managing, something that can be seen with your own eyes .In Business I learned to Simplify processes that I could not measure, control or see with my own Eyes.
There is a lot to be gained by keeping Science and Management SIMPLE.

Captain Jimmy Hull
F/V Sea Lover, F/V Denise Ann,
SAFMC Snapper-Grouper (SG) AP member, SAFMC SEDAR Pool member, SAFMC Citizen Scientist, MARFIN panel member, BDTRT member

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 Action1, 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 disproportionally 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.

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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