

Summary of Public Comments on Snapper Grouper Amendment 44 (Yellowtail Snapper)

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 48 comments specific to Snapper Grouper Amendment 44 provided during the public comment period that ended on February 10th. Of these comments, 19 were submitted verbally and 29 were submitted in writing.

For the listening stations and public hearings, there were 242 attendees and 70 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 in-person, 1 via webinar, and 3 commented. Of the attendees, 2 identified themselves as recreational and 3 for-hire. Of the 3 comments received, all 3 commented on Snapper Grouper Amendment 44.

Marathon, FL listening station (1/19): 3 attended in-person, 2 via webinar, and 2 commented. Of the attendees, 1 identified themselves as commercial, 1 recreational, and 1 commercial/recreational/for-hire/NGO. Of the 2 comments received, 2 commented on Snapper Grouper Amendment 44.

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, 2 commented on Snapper Grouper Amendment 44.

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, 1 commented on Snapper Grouper Amendment 44.

Stuart, FL public hearing (1/25): 10 attended and 3 commented. Of the attendees, identified themselves as 2 commercial, 3 recreational, 1 NGO, and 4 other. Of the 3 comments received, 1 commented on Snapper Grouper Amendment 44.

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, 10 commented on Snapper Grouper Amendment 44.

Murrells Inlet, SC public hearing (1/30): 16 attended and 1 commented. Of the attendees, 6 recreational, 1 commercial/recreational/charter, 2 non-governmental organization, 1 charter, 1 commercial/recreational/charter/other, 1 recreational/other, and 4 other. Of the 16 comments received, 0 commented on Snapper Grouper Amendment 44.

North Charleston, SC public hearing (1/31): 1 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, 0 commented on Snapper Grouper Amendment 44.

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, 0 commented on Snapper Grouper Amendment 44.

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, 0 commented on Snapper Grouper Amendment 44.

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, 0 commented on Snapper Grouper Amendment 44.

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, 0 commented on Snapper Grouper Amendment 44.

Summary of Comments:

Action 1. Specify a single Acceptable Biological Catch (ABC) and Annual Catch Limits (ACLs) for yellowtail snapper in the South Atlantic and Gulf of Mexico.

Comments received during public hearings:

- 9 commenters directly supported Alternative 1.
- 1 commenter directly supported Alternative 3.
- Concern over combining the ABCs of the Gulf and the South Atlantic Council and joining those resources together. That is a precedent that recreational fishermen did not want to see set because it is going to set more precedents for more fish that can then be combined.
- Hold off on any change in management until the next stock assessment.
- Transfer of allocation is not the best method to reduce closures.

Comments received electronically or by other means:

- 18 commenters directly supported Alternative 1.
- The yellowtail snapper fisheries in the Gulf and South Atlantic are very different fisheries and should be managed separately.
- Prefer Action 1, Alternative 1, but 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.

Action 2. Revise sector allocations and accountability measures for South Atlantic yellowtail snapper.

Comments received during public hearings:

- 9 commenters directly supported Alternative 1.
- 1 commenter directly supported Alternative 2.
- There is potential in several of the options that could cause a closure of the recreational fishery if uncaught quota is reallocated. They advised extreme caution in taking away from recreational allocation or taking an action that would cause a closure in the yellowtail snapper recreational fishery.
- Consider variability in recreational landings and potential that landings for the sector may be underestimated. If in fact the recreational landings are being underestimated and the Council allocates unrealized catch to another sector on that basis, it could potentially cause, in several of the options, a closure of the recreational fishery.
- Recent increase in reliance on yellowtail snapper for the recreational sector due to slow dolphin season.
- Do not want uncaught recreational quota provided to the commercial sector. Recreational fishermen would like to know fish left in the water for conservation are not rolled over to another fishery.
- Hold off on any change in management until the next stock assessment.
- Transfer of allocation is not the best method to reduce closures.

- Consider commercial trip limits, especially during the spawning season and a size limit increase.
- There is no commercial trip limit. Consider a commercial trip limit with a step-down.

Summarized comments received electronically ([online comment forum](#)) or by other means:

- 8 commenters directly supported Alternative 1.
- 1 commenter directly supported Alternative 2.
- Keep the commercial and recreational quotas separate. If recreational anglers do not catch their share, then the species will have more opportunity to grow. If after three years the recreational fishing persons continue to fall very short, then readdress the topic.
- The commercial sector should have a separate quota that does not pull from the recreational quota.
- Adopting Amendment 44 would not have immediate adverse effects but in the long-term will have negative effects on both the fish population and the recreational fishery, especially those in SE Florida and the Keys. If adopted, over the next decade, there will be a reduction in the stock, and then further restrictions imposed onto recreational anglers.
- Opposed to taking any of the recreational yellowtail snapper quota and giving it to the commercial quota.
- Prefer Action 2, Alternative 1, but 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.
- This is an extremely important amendment to the way of life in the Florida Keys and it is imperative that the focus of the SAFMC is to realize both the economic and socioeconomic values of yellowtail snapper and not change the allocations that currently exist.

Other comments on the yellowtail snapper fishery received during public hearings:

- Keep in mind that the fishing year recently changed and the Council has not received landings for an August to August fishing year yet.
- The newly revised fishing season beginning August 1st gives both sectors great opportunity for peak landings during months when tourism peaks.
- Increase the size limit to 14 inches.
- A 12 inch size limit is too small.
- Average size of yellowtail snapper landed has decreased overtime. Suspect that size to sexual maturity is significantly lower in response to fishing pressure.
- Close or reduce harvest during the spawning season for both sectors.
- Consider May and June spawning months.
- The yellowtail snapper fishery in the Keys is one of the most sustainable fisheries for both the recreational and commercial sectors.
- Allow yellowtail snapper to remain in strong numbers for future generations.
- Boxes from chum blocks are being thrown in the water and are degrading the reef.

Other comments on the yellowtail snapper fishery received electronically or by other means:

- Increase size limit to 16 inches with a 12 per person or 48 fish vessel limit.
- Consider 200-pounds commercial trip limit and 10 per person/30 per vessel recreational limit during spawning months. Create a separate limit to accommodate headboats.
- A 12 inch size limit is too small.
- Increase the size limit to 14 inches. This will have a huge “quality” effect for everyone involved in the fishery.
- Wait until the next stock assessment is completed before taking action.

Removed Actions in Amendment 44 but not part of public hearings or scoping (regarding Dolphin Wahoo Amendment 10 which was removed from Snapper Grouper 44):

- In favor of redefining OY and adjusting sector ACTs in the dolphin fishery.
- Largest factor in OY for the dolphin fishery is an abundant stock.



February 10, 2017

Gregg Waugh
Executive Director
SAFMC
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Dear Director Waugh:

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

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

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

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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