

Control Date for the Federal Charter Vessel/ Headboat (For-Hire) Component of the Recreational Sectors of the Coastal Migratory Pelagics Fishery in the Atlantic, Dolphin and Wahoo Fishery in the Atlantic, and Snapper-Grouper Fishery in the South Atlantic.

Comment Period: September 27-October 27, 2016

Comments Received: 943

1. Form letters, approximately 75% of the comments:

- A. I oppose limited entry in the South Atlantic red snapper fishery because the policy would negatively affect my industry. I make my livelihood in the recreational boating industry, and this policy would negatively affect businesses like my own. There is no current reason to limit entry into these fisheries because the number of permits has been relatively stable over the last 10 years with less than 7% variation annually. Additionally, there is no resource problem with the fishery and the stock is not in trouble. Instead, the Council should take a very cautionary approach to limiting access to public resources and monitor the number of permits issued each year, addressing increases in permittees only if it becomes an issue. Likewise, the Council should explore other regulatory and educational approaches that can improve reporting by charter for-hire. One example would be to require log books to be completed before a renewal permit is issued. Additionally, I oppose limited entry in the South Atlantic because experience in the Gulf Council has shown that limited entry is the first step towards sector separation and individual catch shares. These issues have been extremely divisive in the Gulf, not only between sectors, but also within the Council itself, and have been detrimental to the recreational fishing community, the boating & recreational fishing industries, and the fishery itself. Limited entry is being promoted to the South Atlantic Council by a select few that would stand to profit financially from this action. Meanwhile, businesses like mine would be adversely affected. With many other options still to be fully explored, limited entry should not be considered at this time and should only be considered in the future as a last resort. I sincerely appreciate your consideration. Thank you.
- B. I would like to raise a voice against limited entry in the South Atlantic red snapper fishery. There is no current reason to limit entry into this fisheries because the number of permits has been relatively stable over the last 10 years (less than 7% variation annually). Additionally, there is no resource problem with these fisheries (i.e. stocks are not in trouble). Instead, the Council should take a very cautionary approach to limiting access to public resources and monitor the number of permits issued each year, addressing increases in permittees only if it becomes an issue. Likewise, the Council should explore other regulatory and educational approaches that can improve reporting by charter for-hire (e.g. log books must be completed before a renewal permit is issued). I oppose limited entry in the South Atlantic because experience in the Gulf Council has shown that limited entry is the first step towards sector separation and individual catch shares. These issues have been extremely divisive in the Gulf, not only between sectors, but also within the Council itself, and have been detrimental to the recreational fishing community, the boating & recreational fishing industries, and the fishery itself. Limited entry is being promoted to the South Atlantic Council by a select few that would stand to profit

financially from this action. With many other options still to be fully explored, limited entry should not be considered at this time and should only be considered in the future as a last resort. Thank you very much for your consideration.

- C. I am writing to you in opposition of the proposed rulemaking by the Southeast Regional Office to set a control date of June 15, 2016, for the federal charter vessel/headboat (for-hire) component of the recreational sectors of the coastal migratory pelagics fishery in the Atlantic, dolphin and wahoo fishery in the Atlantic, and snapper-grouper fishery in the South Atlantic. Historically dolphin/mahi and wahoo were species that were typically landed well offshore at the Canyons (100 miles) southeast of Cape Cod. Few charter boats have the ability to safely navigate such distances. As a result of increasing water temperatures and/or the climatic shift south of Cape Cod these species are now being encountered closer to the near shore waters safely within reach of smaller vessels. The New England for-hire fleet is adjusting to an unprecedented disruption in the groundfish fishery, specifically cod, which has historically been the mainstay of our business. With a bleak prospect for a near-term cod recovery, the charter boat fleet is looking for alternative species to market their trips. As a result, the June 15, 2016 control date for the for-hire component of the recreational dolphin and wahoo fishery would unfairly penalize the New England for-hire fleet. The need for a control date is inconstant with the fact that the recreational dolphin/mahi fishery historically does not exceed its ACL and ultimately results in a significant under harvesting of dolphin/mahi each year. In addition, an updated dolphin/mahi stock assessment is well overdue and recommended before any action or control dates are implemented. If a control date is required for management purposes, we urge the SAFMC to consider a control date later in 2016 that would allow those New England for-hire vessels who anticipate targeting dolphin/mahi, coastal migratory pelagics, and South Atlantic snapper-grouper as a future component of their business model, proper time to secure the permit. To do otherwise would be punitive to an entire region for whom dolphin/mahi may well represent an important part of future business.
- D. As a recreational angler, I oppose the establishment of the June 15, 2016 control date. I appreciate the South Atlantic Council working towards solutions to the frustrating closure of the red snapper fishery. However, I feel the Council's support of a control date and consideration of limited entry for all federally permitted charter fisheries in the South Atlantic as a management tool is premature and unwarranted at this time. Currently, there is no demonstrated need or demand for limiting the number of permits for any of these South Atlantic fisheries. As an alternative, we encourage the Council to monitor the number of permits issued each year and address any increases if and when they become an issue. In addition, tactics like setting a control date and considering limited entry for South Atlantic fisheries have proven to be extremely divisive elsewhere. In the Gulf of Mexico, such actions have been detrimental to both recreational fishing and the fishery. For these reasons, I am strongly against using this approach in the South Atlantic except as a last resort.

2. Letters received representing regional for-hire fishermen (Summary of comments):

1	New England Fishery Management Council representing the recreational for-hire industry suggests revisiting the date to allow for additional comments , allow reasonable access to these species.
2	Commonwealth of Massachusetts Division of Marine Fisheries strongly urges reconsideration. Climate change impacts the fisheries, causing shifting distributions, productivity and abundance. Requests joint development for these fisheries that extends beyond the geographical authority of one Council.
3	Stellwagen Bank Charter Association representing over 60 captains. Have had severe reduction in trips to due to inability to target cod, so captains want to target mahi, wahoo, cmp, grouper, and snapper. Need time to secure permits.
4	KW Carter Boat Association board members agree with the control date. Have been overrun with inexperienced and abusive competition, and want sustainability of the fisheries.
5	American Sportfishing Association opposes the control date, closure of the red snapper fishery, and it is premature and unwarranted. The number of permits is stable, and encourages the Council to improve reporting compliance and and monitor permits. Catch shares have been divisive in the Gulf and the Gulf Council, and detrimental to the fisheries. Only a select few would benefit.
6	American Bluefin Tuna Association stated that discussion regarding a control date should be viewed in context of other decisions and rule-making. It is a violation of numerous National Standards. Optimum Yield is not considered in the management of the dolphin fishery. A stock assessment must be completed. This control date will be detrimental to the Mid-Atlantic and New England fishermen, but benefit South Atlantic fishermen.
7	Rhode Island Party and Charter Boat Association representing 65 charter and party boat businesses recommends stock assessments prior to control dates. Also, recommends considering participants throughout the range of the species, not just the southern range. Dolphin is not at risk from being exceeded.
8	CPF Charters "Perserverance" stated that the New England for-hire fleet is being unfairly penalized by the control date. They can not navigate to distance required to catch the fish. The catch limit is not at risk of being exceeded. Consider a later date to allow fishermen to anticipate their business model.
9	Congressional Sportsmen's Foundation opposes the control date and suspend efforts to move forward with rule-making. Permits are stable. There is not strong industry support, and no compelling threat to justify a limited entry and catch shares or sector separation.

3. Other general comments from approximately from 100 individual commenters (Summary of comments):

1	Consider other options, such as reporting requirements, logbooks
2	Retired veteran. Control date will limit old and new people from entering
3	Control date will put the individual out of business
4	Need growth for small business; control date hinders that opportunity
5	A control date limits the resource to a small group that will profit from limited access
6	This is a major conflict of interest that a charter captain can vote on this decision
7	The cost for other fisheries is too high
8	Limiting the red snapper fishery is wrong; there are enough fish
9	Against catch share program
10	Distruption in other fisheries (cod, dolphin, wahoo)
11	Not enough notice of the control date to anticipate business model and secure permits
12	Lawsuit
13	Weather affects other fisheries
14	There is no need for it, the fisheries are great and the permits have been stable
15	Too much control over public waters; everyone should have access
16	New stock assessments need to be completed first prior to control dates
17	Agree because it will work towards sustainability and accountability, collection of needed data, while preventing over capitalization for the industry.