Good afternoon gentlemen. Thank you for the opportunity to address the council members. We appreciate the opportunity to get educated on what the council's doing, but I suggest that you all consider maybe next time you do any kind of scoping or public hearings that you limit it to the number of amendments you discuss. And I'm sure you've heard that, but seven is just – I mean I'm fairly well informed and I'm overwhelmed by this, so I'll try and be brief. Well, not really.

All right, I'll start on comprehensive annual catch limits. ACL's are not supposed to be implemented until after the recreational data system is repaired. We all know that. We've sued National Marine Fisheries Service over it, yet it's still happening. To establish ACL's based on fatally flawed data is irresponsible and will result in lost jobs, lost economic activity, loss of heritage and more. In fact, it will plain out ruin some people's lives based on uncertainty. Come on, guys. The entire process is wrong. None of the ACL framework takes into account any increased landings that will always result from a rebuilding fishery. Failure to take this into account causes further economic damage, further job loss and further erosion of our heritage. As a reward for rebounding or expanding fishery, more people's lives will be ruined forever. Does anyone realize what happens when a person is put out of business? Economic pressures are bad enough, but when fatally flawed data and uncertainty combine to ruin people's lives and cost our state jobs, we have truly reached the point of insanity.

I feel that the council is way over the line, as is NIMS. I know they're pushing you on establishing ACL's. Magnuson's intent is being twisted to reduce or eliminate fishing effort. Uncertainty of management is being translated into certainty of job loss and reduction in economic activity. We suspect that this is part of a squeeze play to force catch shares upon the participants in the fishery. With regards to snapper-grouper regulatory amendment nine, accountability measures, or AM's, and the ACL should include a carryover of unrealized allowable catch. This would help with the balancing of the sticklike nature of the size of a stock given your class. Rebounding stocks will penalize fishermen, and Dr. Crabtree just said this actually at a recent SFC meeting ____ it'll cause the annual catch limits to be hit sooner, thereby kicking in the accountability measures, and all that's gonna do is penalize us all for what we should be rewarded for – a rebounding fishery.

We're concerned that the ACL's and AM's are overly broad and punitive failing to take into account the certainty with which jobs will be lost, economic activity will be decreased and lives will be ruined.

For your eco-system based amendment two, habitat area of particular concern, I've had that buzzword. It's called HAP C. And I say HAP C is just another word for a no fishing zone soon to be. We propose that on action two you go with alternative one. We don't think you should pull the management power from the Gulf council over to Gulf zone. You all have enough problems managing what you have. I know your resources are thin.

This kind of appears to be an attempt to install a system which allows the elimination of all effort to protect one species. A federal judge declared that practice illegal. We urge

that the council choose to follow the spirit and letter of federal law. We are concerned that any excess mortality on one species would lead to a complete closure of a wide range of species. So we see that there is no biological threat, so this is kind of an unwarranted economic constrain, and we don't need any economic constraints right now that don't need to be there. Again, not to ignore conservation, and we advocate first and foremost management towards a healthy eco system and a healthy stock. I don't think there's anybody here who would say that red snapper and grouper are in this dire trouble that these assessments seem to say they are and the management actions that are being taken because of that supposed trouble.

With respects to comprehensive catch share amendment 21, not directed personally at you guys, but what part of no catch shares did you guys not hear the first time around? The FRA adamantly eploses the use of catch shares in recreational fisheries especially. We are very concerned about 'em in commercial fisheries. They have absolutely no place in a recreational fishery. And by the way, recreational angler fishes from shore from their own boat, from their friend's boat or from a hired professional's boat. But keep in mind as you go forward with this that it is recreational angling. You either catch fish for a profit or you catch fish for pleasure. There is no gray area, and that's what – there's kind of this gray area that's being pushed to try to bring catch shares into the four higher sector by saying they're somehow different than the recreational angling sector. We disagree with that. The fish belong to the recreational angler, not the captain who took the angler fishing. Catch shares in the recreational sector are unwanted, unwelcome and will certainly destroy the opportunity to fish for generations to come.

On snapper, grouper amendment 24, the FRA opposes any reallocation based on the fatally flawed murphs data. And face it, that's all you got. We adamantly oppose any notion of giving ownership of any fisheries to four higher operators, or for that matter to commercial operators. Nobody should own the fish. A commercial fisherman should not have to rent the right to fish commercially from another commercial fisherman. It just doesn't seem right.

Thank you for your time, and thank you for the opportunity to comment.

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