May 18, 2008

Jack McGovern NOAA Fisheries Service Southeast Regional Office Sustainable Fisheries Division 263 13th Ave S St. Petersburg, FL 33701

RE: The sale of bag limit harvest fish

Dear Mr. McGovern:

Being a commercial fisherman, in the Northeast Florida fisheries zone, for over 30 years, I find it hard to understand why we are trying to be put out of business. I believe consumers would rather have fresh Florida seafood than farm grown or imported from other countries.

Larger commercial vessels will not be able to sustain a means of living if catches are limited as the proposal states and there are still plenty of Vermillion snapper as the commercial divers have already attested to.

In all fairness, I would like to request consideration that the limit be higher for the area of the Atlantic, north of St. Augustine, FL. The fishermen, in this area, have a lot further to go to catch their fish to make a living. The Kingfish limit is set that way.

Thank you for your consideration,

John W. Haslett

John W. Haslett 7113 Mills Ave Jacksonville, Fl 32211

Dear Sirs,

I am against allowing the sale of grouper or snapper for recreational fishermen for the following reasons.

- 1. Under the current system there are many fishermen who stop keeping fish when they get enough for their own needs and if they were allowed to sell fish many would keep fish beyond their needs to sell putting extra pressure on the fishery.
- 2. I believe that the ability to sell fish would give dishonest fishermen an excuse for keeping fish over the limit to pay for their boat and expenses.
- 3. I think that there are a group of fishermen who would commercial fish under these rules that are not now commercial fishing putting more pressure on the fishery.

I do believe however that the snapper and grouper fishery is in its best shape in my entire adult life. I have been fishing off the cost of Jacksonville for 49 years. My father owned a marina in Mayport when I was in grammar school and I fished on head boats for fun on the weekends and in the summer until I graduated from college in 1972.

Red Snapper

I have never seen so many red snapper as we have now. I cannot remember when I would target grouper, cobia, sea bass, and triggerfish assuming that a limit of red snapper was a matter of easy by catch. In the last 3 years we have been able to catch a limit of snapper and actually run from them fishing as many as 15 places in a short day to catch other fish to go with the easy limit on red snapper. In the last 2 to 3 years I have noticed a huge increase in the population of legal size red snapper. I have marked huge schools of fish that appear to be 250 to 300 feet wide and 15 feet tall containing snapper of all sizes (we catch mostly fish in the 18-28" range). It appears to me that the conservation method in place for red snapper in our area could not work better. If any changes were to be made I would suggest increasing the minimum size limit to 21", wait a year or 2 then increase it to 22". When we release red snapper they swim directly back down to the bottom so I do not see any problems in releasing them. They are very hardy. I cannot remember the last time that I have released one that did not survive. I also dive recreationally and often see huge schools of snapper even in the summer. It is obvious that the current regulations have worked like a charm and really do not need changing. Increasing the minimum size you can keep would allow more of the larger fish to spawn. In any case we rarely keep snapper less than 22" now because there are so many fish that size or bigger. A 22" red snapper has about 40% more meat than a 20" fish. They start getting fatter at that age.

Grouper

Although I have seen a good increase in legal grouper in our area in the last couple years; I believe that additional measures should be put in place to help increase the stock level. There are far less grouper than snapper. I believe that a reduction to 1 gag grouper per person should be imposed. A maximum boat limit of 4 would also prevent someone from getting on a bite of grouper in a feeding frenzy. I would also suggest that the commercial harvest of grouper should

be closed from December 15 through the end of March or even April which is which is when they are lethargic and easy targets for commercial spear fishermen. We rarely catch them on hook and line when the water temperature is below 65 degrees because they are so lethargic.

Cobia

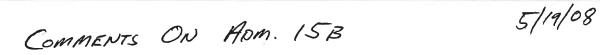
The current limits on cobia seem to be working. I have seen a good increase in cobia in the last few years.

Sea Bass I have seen a huge increase in sea bass in the last 3 years

Triggerfish Same goes for trigger fish

Beliners Although I rarely target beliners

Sincerely, Steve Proctor 2312 Pine Island Court Jacksonville, Florida 32266 <u>Steve.proctor@proctorace.com</u>



AS I HAVE STATED IN NUMEROUS SAFMC MEETINGS, "IF You CAN NOT FORM THAT THIRD COLUMN TO ACCOUNT FOR RECREATIONAL SALE OF FISH, THEN PROHIBIT THE SALE ALTOGETHER." WITH QUOTA REDUCTIONS IN ALMOST EVERY COMMERCIAL FISHERY, ESPECIALLY IN THE SNAPPER/GROUPER COMPLEX, IT IS TOTALLY NOT ACCEPTABLE FOR THE RECREATIONAL SECTOR TO SELL FISH AND HAVE THAT GO AGAINST THE COMMERCIAL QUOTA. THIS IS A COMMERCIAL QUOTA FOR COMMERCIAL FISHERMEN, NOT FOR SOMEONE WHO DOES THIS TO OFFSET THEIR COST OF PLAY!!! ANOTHER VALID REASON IS THAT YOU HAVE A DOUBLE SET OF STANDIARDS WHEN IT COMES TO THE TRUE PERMITTED COMMERCIAL FISHERMAN US RECREMINAL SALE OF NON PERMITTED VESSELS. BY THIS IMEAN COAST GUARD INSPECTED VESSELS, SAFETY EQUIPMENT AND TRAINING, OBSERVER COVERAGE, THE LIST GOES ON. THIS ISSUE NEEDS TO BE RESOLVED BY PROHIBITING THE SALE OF RECREATIONALLY CAUGHT FISH.

THANK You, Kelly Schoolcuft