

Dear Council member,

My name is David R. Andrew and I would like to make known my comments on Amendment 16. I would like to take this opportunity to personally request that you strongly vote against closing and reducing the snapper and grouper season as is being proposed. It is more than obvious, that if it closed the most affected would be the recreational fishermen. In all of the many years of fishing, I have never known any species of fish there being threatened or depleted by recreational fishing. Would please consider utilizing the attached alternatives as a viable option before the board overreacts - thanks for consideration - from Chief David R. Andrew, Orlando Fire Department, CFOA member, avid recreational fishermen

Alternative 1. No action. Current Regulations:

- (i) Current gag commercial regulations = 24 inch total length size limit; March & April - no harvest above bag limit & no sale; vessels with longlines may only possess deepwater species; limited entry program with 2 for 1 provision.
- (ii) Current gag recreational regulations = 24 inch total length size limit; within 5 grouper bag limit only 2 may be gag or black grouper; March & April no sale.

I support this alternative with the modification.

- Banning of all longlining fishing
- Elimination of all habitat destructive fishing practices
- Elimination of fishing methods that produce bycatch

Alternative 2. Establish a gag spawning season closure January through April that applies to both the commercial (20% reduction) and recreational (31% reduction) sectors; no fishing for and/or possession of gag would be allowed. In addition, no fishing for and/or possession of the following species would be allowed: black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney.

The SAFMC contends that 52.8% of the catch (Source ALS. Prepared by Jack McGovern (NMFS SERO).) is commercial. This is a statistic that is derived from little to no data as admitted by John Carmichael of the council staff. The SAFMC must first collect reliable data to be able to make any decision on future rulemaking. The council in the past has taken the position that where funding has not been provided that actions will not be undertaken. This is the only position that can be taken in this instance where the council does not have any reliable data to support the statistical basis for this decision.

Further there is no reliable data that would support the underlying premise that the recreational sector is taking its allocation. Therefore, there is no basis for a reduction or closed season for recreational anglers and none should be implemented.

If it is the councils decision to press forward with rulemaking without basis, then the reductions must be made as required by the Magnuson Stevens Act and must be in proportion to the take of each sector. The majority of the reductions must be borne by the commercial sector.

In addition this is being pushed a commercial regulation while also imposing a closure on the recreational sector. Then it appears to be the councils intent to enact a second reduction by enacting a reduced bag limit. This is patently unfair to the recreational sector.

Alternative 2. Gag Spawning Season Closure. [Note: Old Alternative 2 was split into two sub-alternatives with both being preferred.]

- Alternative 2A (Preferred). Establish a gag spawning season closure January through April that applies to the commercial (20% reduction) sector; no fishing for and/or possession of gag would be allowed. In addition, no fishing for and/or possession of the following species would be allowed: black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney.

- Alternative 2B (Preferred). Establish a gag spawning season closure January through April that applies to the recreational (31% reduction) sector; no fishing for and/or possession of gag would be allowed. In addition, no fishing for and/or possession of the following species would be allowed: black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney.

I oppose these alternatives in that there is no reliable data to support the closure. The data clearly shows that the stocks are currently in rebuilding but the Council has chosen targets for the fishery that are above historic levels and not supported by any historical data. Gag Grouper are not listed as overfished in the June assessment and the Bmsy is only .92.

The Council is charged by the Magnuson Stevens Act and the National Standards to take the least oppressive management alternative, this council consistently chooses the most draconian. The proposed alternatives violates National Standard (1) in that it does not achieve on a continuing basis the optimum yield from the fishery; National Standard (2) in that all measures shall be based upon the best scientific information available, by closing the fishery the Council is not using the available science but is using outdated and data known to be inherently unreliable to make determination; National Standard (8) closing the fishery ignores the requirement that the Council take into account the importance to the fishing communities and minimize the adverse economic impacts, the closure will in effect put the for hire and the recreational fishermen out of the fishery and have a very destructive impact on communities that have already been hit hard by the reduction in fishing trips due to the recent rise in fuel prices and National Standard (9) by failing to take any action whatsoever to minimize bycatch from the sacred cows of this Council the longliners and shrimpers.

Alternative 3.

Establish a 1,000 pound gutted weight gag commercial trip limit.

Alternative 3a. Establish a 1,000 pound gag gutted weight commercial trip limit with a fishing year start date of May 1. In addition, during March and April no fishing for and/or possession of the following species would be allowed: gag, black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney. [Note: This is a new alternative.] Alternative 3b. Establish a 1,000 pound gag commercial trip limit with a fishing year start date of January 1. In addition, during February, March and April no fishing for and/or possession of the following species would be allowed: gag, black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney. [Note: This is a new alternative.]

I support this alternative.

Alternative 4 (Preferred). Directed Commercial Quota. Establish the following directed quota (quota after Post Quota Bycatch Mortality or PQBM has been subtracted) for 2009 onwards until modified. After the commercial quota is met, all purchase and sale of the following species is prohibited and harvest and/or possession is limited to the bag limit: gag, black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney.

I support this alternative.

Alternative 5. Divide the directed commercial quota into two regions: Allocate 63.3% to North and South Carolina (224,044 pounds gutted weight) and 36.7% to Georgia and Florida (129,896 pounds gutted weight). Each regions directed quota (after adjustment for PQBM) would be monitored from state trip ticket and logbook data based on state of landing. After the commercial quota is met in either region, all purchase and sale is prohibited in that region and harvest and/or possession is limited to the bag limit in that region.

I support this alternative.

Alternative 6. South of the Miami-Dade/Monroe County line, no fishing for and/or possession of the following species would be allowed during June 1-December 31: gag, black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney. No fishing for and/or possession of gag would be allowed year-round south of the Miami-Dade/Monroe County line. Fishing for black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney would be allowed January 1 May 31 for the Southern region. Note: This alternative would apply to both the recreational and commercial fisheries. [Note: This is a new alternative.]

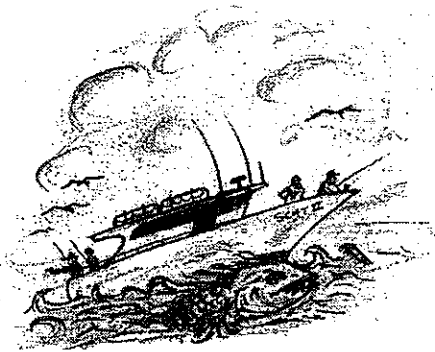
I oppose this alternative.

Alternative 7a. Reduce the 5-grouper aggregate bag limit to a 3-grouper aggregate bag limit, reduce the existing bag limit from 2 gag or black grouper to 1 gag or black grouper within the grouper aggregate bag limit, and exclude the captain and crew on for-hire vessels from possessing a bag limit for groupers.

Alternative 7b. Close the month of December to recreational harvest and/or possession of gag, black grouper, red grouper, scamp, red hind, rock hind, yellowmouth grouper, tiger grouper, yellowfin grouper, graysby, and coney. This alternative would retain the existing 5-grouper aggregate bag limit and 2 gags or black grouper bag limit. The December through April closure plus the reduction in bag limits would result in a 42% reduction in harvest.

I oppose both alternatives in that there is no reliable data on recreational landings to support this position. Further a ban of all longlining and pushing shrimping out past 60 fathoms would have a The Council is charged by the Magnusson Stevens Act and the National Standards to take the least oppressive management alternative, this council consistently chooses the most draconian. The proposed alternatives violates National Standard (1) in that is does not achieve on a continuing basis the optimum yield from the fishery; National Standard (2) in that all measures shall be based upon the best scientific information available, by closing the fishery the Council is not using the available science but is using outdated and data known to be inherently unreliable to make determination; National Standard (8) closing the fishery ignores the requirement that the Council take into account the importance to the fishing communities and minimize the adverse economic impacts, the closure will in effect put the for hire and the recreational fishermen out of the fishery and have a very destructive impact on communities that have already been hit hard by the reduction in fishing trips due to the recent rise in fuel prices and National Standard (9) by failing to take any action whatsoever to minimize bycatch from the sacred cows of this Council the longliners and shrimpers greater and faster result in rebuilding the stocks.

Sincerely,
David R. Andrew



SCANNED to AA
8/28/08
@

RECEIVED
AUG 28 2008
South Atlantic
Fishery Mgmt Council

AMICK'S DEEP SEA FISHING

P.O. BOX 30978
SAVANNAH, GA 31410
912-897-6759

August 21, 2008

Council Members,

With the upcoming council meeting in September in Charleston where you will be discussing the Interim Rule that would possibly shut down the Red Snapper harvest, I would like to make some comments and share with the council catch records from the 2008 season up until August 08.

I attended the council meeting this past June in Orlando and listened to Dr. Luiz Barbieri (vice chairman SSC) present his report to the council. Dr. Barbieri acknowledged comments from the public and fisherman that indeed there are more and larger Red Snapper but attributed the fact of more and larger Red Snapper to two strong year classes. This I must point out was omitted from the original stock assessment.

However, he explained to council that there is little evidence to show "that there is anything following these two strong year classes."

With tropical storm Fay pounding the east coast with wind and rain, I took the opportunity of the down time to go through my catch records for 2008 and see exactly where we are sitting as far as Red Snapper landings compared to previous seasons.

Simply put we are having a banner year on Red Snapper. To date we have landed more Red Snapper in the 5lb to 14lb range than any previous year since the implementation of the 20 inch size limit and 2 per person bag limit. Keeping in mind that we still have three months of the season left and with our best Red Snapper fishing in October and November, it is hard for me to believe that what we are seeing is just "two strong year classes of Red Snapper".

I have enclosed my catch records from previous seasons and have added the 2008 landings up to August 2008 for you to compare.

I attribute the numbers and size of Red Snapper we are landing to several factors:

- #1. The 2 per person bag limit.
- #2. The 20 inch minimum size limit. I truly believe that the survival rate for Red Snapper caught recreationally in 30 meters or less is 80% or better in the South Atlantic Bight.
- #3. The reduced fishing effort because of a) bad weather b) dramatic increase in fuel cost c) the difficult economic times.

We as a deep sea fishing business are off 40% on number of trips run from average years. When we are offshore we are seeing practically no recreational fishing on the so called Snapper Banks and very few other for hire vessels.

I must admit that I don't fully understand the complexities of the stock assessment for Red Snapper. However, I do question the need for an emergency closure for Red Snapper. I understand that the Interim Rule would be a way to meet the one year dead line to stop overfishing, but a closure will have a devastating impact on so many. This is hard to accept when the fishing we are experiencing indicates improving stocks not only in numbers but average size as well since 1992.

I understand that Council's foremost position is the health of the Red Snapper stocks. I am not suggesting that "no action" is needed, but a total closure would be a great disservice to fisherman up and down the coast.

Respectfully,
Capt. Steve Amick



YEAR	RED SNAPPER LANDED	10 YEAR OLD OR OLDER 30" PLUS 15 TO 35 LBS LANDED	4 TO 9 YEAR OLD 20 " PLUS 5 TO 14 LBS LANDED	2 TO 4 YEAR OLD LESS THAN 20" 2 TO 4 LBS RELEASED
1983	701	7		na
1984	901	19		na
1985	1215	28		na
1986	856	21		na
1987	1929	33		na
1988	1330	18		na
1989	1700	37		na
1990	798	23		na
1991	631	23		na
1992	1470	26	179	1291
1993	1759	25	363	1396
1994	1620	37	563	1057
1995	848	34	392	456
1996	475	44	257	218
1997	1583	58	263	1320
1998	1946	90	371	1575
1999	2558	95	442	2116
2000	4372	85	468	3904
2001	2809	56	657	2152
2002	2649	60	1452	1197
2003	1843	49	771	1072
2004	2274	69	797	1477
2005	1651	71	512	1139
2006	1207	60	393	814
2007	2452	49	341	2111
TOTALS	41,577	1117	8221	23,295

2008

1673

44

714

915

Up till Aug 21, 08

From: lpa1@bellsouth.net
To: georgejgeiger@bellsouth.net
Subject: amemdmeny 16 options/red snapper potential closure
Date: Thu, 28 Aug 2008 14:16:36 +0000

Drear Mr.Geiger,

It appears to me that you don't acknowledge receipt of electronic correspondence when requested.This is not a very professional way to handle your role as council chair.If you don't have the time to personally do it,have one of your staff take the time.This is a sound business practice and may be less contentious in the long run.

The proposals on the table for amendment 16 are not based on the real world.Your scientific advisors are not on the water.Computer analysis of suspect data doesn't lead to good regulations.I have several questions concerning the propsed closure for gag grouper and other fisheries covered in 16.

1) Why were the current months selected?I believe the fishery in the Carolinas doesn't catch a significant quantity of grouper during the currently proposed closure period.How does that help rebuild the stocks when most of their catch is landed in the other open months?

Oculina bank has been closed to bottom fishing for a number of years with the express reason to rebuild snapper/grouper stock.Is this not working?What are the latest stock assessments for the Oculina closed area?How does this impact the area from Canaveral southward?

2)Why can't there be more fine tuning to the proposed geographic boundaries in Florida?i.e.-Cape C nothward,Cape C sothward to Monroe County line?

3)Can bag limit reductions be used instead of closures?i.e.-1 gag per person/trip,2 overall grouper/person/trip.

4)Has the effect of the proposed MPA'S benn taken into account in the proposals?

5)Has the current effort reduction been assessed and entered into your calculations?The effort reduction is real.Just have your scientists look at the # of boats currently fishing.

6)Vermillion snapper are not overfished south of Cape C.More vermillions in more areas.Again,refer to #2.

7)Red snapper are more abundant in our area in the last 5 years.All sizes and all depths.If the council is really serious in reducing fish mortality,reduce the bag limit to 1 @ 16"/angler.My rough calculation says a 50% savings in fish mortality.again please refer to #2.

I have more,but don't want to overwhelm your staff.Please respond with an acknowledgement,as well as,answers to the questions raised.

Respectfully submitted,

Capt.Lew Augusta
F/V Capt.Lew
Big Fish,Inc.

REMEMBER THE SSFFF.

Dear S. Atlantic Council Members,

First, I would like to state that the purpose of my comments are just to voice my opinion on the currently proposed legislation. All of the references that I will make are by no means an attack on the council and any one member whom makes up the council. I will primarily address what I see is being used for the decisions and a few discrepancies that seem to differ from the data and what the general public is being told "has to be done", which may in fact, be a little misleading in the management of the fisheries in our region.

It seems that for too long the subject of the proposed "problem" isn't always defined prior to a "solution" being derived. Public meeting inputs have the attitude that the decision has already been made. As a fisherman, I would be more than happy to supply data or participate in a program to supply data, as would many of the fishermen I know, if you would educate us on what you need for information and assistance.

When will a comprehensive plan be implemented that will unite the individuals necessary in a joint effort from managers, scientists, legislators, environmental and fishers to agree on a common goal? This common goal should be to protect our marine biodiversity along with stimulating long term economic health.

Any form of accountability on the council's part for the decisions made on our behalf as fisherman, doesn't seem to exist. Decisions are made that do not seem to have both the fish stock and all of the fisherman's best interest at heart. I am not saying that your jobs aren't easy in any way. What I am saying is I don't understand how a governing body will tell us that the best available data may be flawed or inaccurate yet you are going to error on the side of caution and incorporate more restrictive legislation. This is happening when our fishing trips are producing large healthy fish for our dinner tables as never before.

The council's actions are speedy mechanisms to put increased restrictions on a fishery, yet there are no such speedy mechanisms to decrease restrictions should any fishery's biomass indeed increase to healthier levels, or have new data to contradict the imposing limits. With such vast time frames between stock assessments, is it any wonder that fishers don't have faith in the system? We hear how it needs to produce results over a long time period such as 10 years to be accurate. Please don't cite here how we can now catch more porgy. Historically, regulations don't give back but become more conservative in restrictions. Too long have fisherman been pitted against each other, both commercial and recreational, in an attempt to, in my opinion, redirect focus on the issue at hand.

These viewpoints are directed towards Amendment 16 yet hold true of all others that are being reviewed at present including Amendment 15B which is going to eliminate the state level commercial fishing license. The concern there is that all of the state license holders are going to be moved to the recreational sector yet the recreational sector total creels aren't going to be compensated prior to the reductions. If 15% of the grouper sales sold commercially are caught by state license holders as stated in the Bag Limit Sales Prohibition, how can you move that many anglers to the recreational sector classification and without first increasing the recreational creel total before imposing a reduction? You are requesting a minimum of 35% reduction in the commercial sector and 37% in the recreational sector. If 15% of the present sales are non-federally permitted sales (state commercial license holders), then the recreational sector is going to actually have a reduction of 52% with the transfer of the state license holders to the recreational sector. I don't understand why this hasn't been accounted for yet. Now the commercial sector has reduced 15% of their catch without losing the first fish. Trip tickets show the fish sales. How does this make sense? The NC Standard Commercial License Holder only accounts for 7.92% of the top 36 species sold in the finfish category. The other 92.08% is caught by federal permit.

As I have read extensive amounts of information including SEDAR 10 along with information from the SAFMC, etc. Here are some points that I would like to bring up.

MRFSS surveys have proved unreliable. Do you feel that adequate changes have been made to update the MRFSS system in the last 10 years with the advancement of technology? MRFSS is usually a year or two behind in estimating this trend, so my main concerns are about over-regulation that may not be warranted. Is there any truth to the fact that the MRFSS can't contact the NC saltwater license holders due to privacy issues? That is a pre-qualified group of people and would seem to make more sense than making random phone calls.

MARMAP surveys on "random hard bottoms" are the basis of most surveys done. We are talking about reef fish, fish that look for live bottom and structure to make their home. The review workshops recommended not using their data for hook and line surveys. Now we are back to analyzing trip tickets.

Data collections from things like "Chevron traps" were inconclusive due to such low catch rates and classified as "indeterminable and inaccurate" after 27 years yet older data is still used to calculate present trends.

Why are things like wave heights, sea surface temps, surface currents, hurricane impacts, dissolved oxygen, salinity, wind speed, wind direction, etc not included in present studies?

Why are issues like water quality and pollution along with protecting our juvenile fish using our estuaries for growth not addressed or protected? Why are all of the juvenile fish studies done in Florida only? We can pay a hog farmer or tobacco farmer not to raise their crop yet we don't address the shrimping bycatch that is drastically affecting our fish stock? Please don't tell me how great the "bycatch" gear is doing in the shrimping industry; the bycatch being shoveled overboard looks like a snow storm floating on the water coming from a shrimper. There is a reason why 300 seagulls are flying around a shrimp boat when he is pulling in his nets. I understand they have to make a living, however, subsidize their income for the percentage necessary and stop letting them trawl on the inside and watch how well our fisheries explode.

I am concerned on how "overly conservative" the council seems to be in their calculations and proposed regulations. Below are some of the areas that if corrected to more realistic parameters, would take us out of the "overfishing" category that the grouper and snapper species are presently assessed as.

I am concerned that F (fishing mortality; the percentage of the population that dies each year from fishing) is overstated partly because it is based on:

1. Marine Recreational Fishing Statistical Survey (MRFSS) estimates of landings and discards, which have been declared unreliable and even "fatally flawed"™ and
2. An overstated recreational release mortality of 25%.
3. 2004 data being used for current fishing pressure. Obviously there has been a declining amount due to fuel and tackle prices alone.

Recreational fisheries Release mortality is presently assumed to be 25%, SEDAR 10 workshop stated Improved estimates of post-release mortality were obtained through tag release and caging methods (Burns et al. 2002; Overton and Zabawski 2003; McGovern et al.2005). Using these methods, mean mortality rates were estimated to be 21.2% (Overton and Zabawski 2003), 23% over a variety of depths (McGovern et al. 2005).

Commercial fisheries Release mortality is presently assumed to be 40%.
Your reasoning behind the proposed legislation is that the FMSY is below the F (Fish Mortality) factor, the FMSY has remained below the F (Fish Mortality) factor since 1983 in the S. Atlantic. With the council willing to error on the side of "conservative numbers and factors" is it any wonder this is the trend? Now take a look at our stocks. Have we decimated our biomass? No. I don't think real world numbers aren't being applied to gauge accurate regulation.

How can the Magnuson Stevens Act expect you to make changes within 1 year of notification if the council states that it takes 3-8 years to schedule and complete a stock assessment? For that matter, why, if notified that a stock is in "trouble", aren't scientists required to gather the current data compiled between the last stock assessment and the present date of the notifications, then review to determine if an issue really exists at the present notification time period prior to taking action?

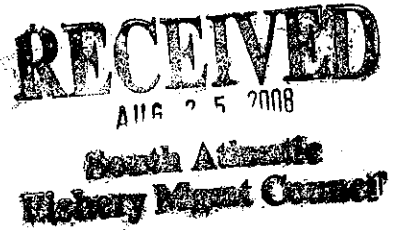
According to your own data workshops, SSB (spawning stock biomass) increased after 1999 corresponding to implementation of the 24 inch minimum size limit. Fishing mortality has been decreasing since 1992. The gag grouper lifespan has just been raised to 26 yrs to 30 years. Does this sound as if the fishery is experiencing overfishing or possibly slated to be overfished if fish stock as a whole are living longer? This extension in the lifespan is setting us up for a future reduction by saying that you life expectancy has "dropped". Models only calculate out to 20 years in the S. Atlantic now. Why change what we already have in place.

50% of maturity is 3 years and 25.5 inches. Why don't we increase the minimum size limit to 26". It has proven effective for the size increase in 1999 to 24".

Fishing mortality in 2004 was estimated as 0.31, extremely conservative against 2007 projected mortality. Please, please, please use a more current data. This factor alone could nearly take us out of the "overfishing" status and not require a 10-15 yr rebuilding plan.

Steve Carpenter

WILLIAM A. CONNER
9327 RIVER SHORES LANE
JACKSONVILLE, FLORIDA 32257



August 20, 2008

Bob Mahood, Executive Director
South Atlantic Fishery Mgmt. Council
4055 Faberplace Drive
Suite 201
Charleston, SC 29405

RE: Amendment 16

Dear Sir:

August 7, 2008, I attended a meeting in Jacksonville, Fl. held by two people who informed the audience to address any comments to you regarding the proposed Amendment 16.

The audience was informed that some action must be taken, and that taking no action was unacceptable, according to Congressional mandate, and that if the Council failed to act, some other entity would take action. It was unclear who, or what, this other entity is. We were informed that the Council cannot deal directly with Congress because it is against the law!!!!

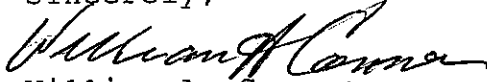
Many people spoke out against the proposed changes, stating that, in their experience, they make no sense. One of the speakers was Becky Hogan, who is an owner of the Mayport Princess, the partyboat with the largest clientele between Charleston, SC and Key West. Becky had in her hands records that the boats' management had been required to keep of the catches from this boat. This information had been kept for the past number of years, and you people never picked it up, or otherwise requested it! We were advised that the Council knows they are working with flawed information, but it is the best they have. (It sounds like the Council is working with NO information, and is making things up.)

The subject of flawed information being used to the detriment of sport fishing and commercial fishing was discussed repeatedly and continuously. The only response was, "We know the information is lacking and flawed, but we're mandated to do something". How ridiculous and sad.

We were informed by one of the holders of this meeting that "new" information about the Vermillion Snapper would be received from scientists by September 15, and that additional "new" information would be received in December, 2008. However, the Council must submit their recommendations by the end of September. Another example of the use of flawed and incomplete information.

It is clear that the Council is spending time and money to make recommendations whether these recommendations are based on flawed, incomplete and wrong information just to be taking some action, any action, to satisfy Congress. It is evident that Council members don't care about doing a good and complete job, based on sound information, and simply want to keep their jobs.

Sincerely,



William A. Conner

CC: Senator Bill Nelson
Senator Mel Martinez
Governor Charlie Crist

WAC/mpc

Kim,

I told my 13 year old son that I thought fishing for red snapper and grouper would be prohibited for a period of time (at least 6 months) and I thought he was going to cry. He enjoys these fishing trips and does not understand why a closed season is necessary when they seem so abundant. It really makes no sense. A reduction to 1 per person would more than cut in half the current by catch if that is the worry because the one fish limit would be so easily reached. Drastic measures are rarely good for the environment or the economy. Please pass this on to the voting members

Went bottom fishing last Sunday and had a typical catch for us this summer

Limit of 6 red snapper 1-17#, 1-12#, 3-7#, 1-6#

5 gag grouper 1-22#, 1-12#, 3-8#

Fished for 3 hours in 80' of water

Steve Proctor

2312 Pine Island Court

Jacksonville, Florida

904-993-9134

All,

I urge you to NOT close either the snapper or grouper recreational fisheries.

I have reviewed the NOAA weather buoy statistics, and would encourage you to look at the weather patterns that dictate which and how many days recreational anglers can fish during the proposed months. In the last 2 years, we had only averaged 20 fishable days during the proposed 4-month closure. Considering most recreational fishermen only fish the weekends, this actually is about 1 day per month. The commercial fishermen tend to fish from bigger boats, and fish both weekend and weekdays and it appears the 2-month commercial closure is working. The recreational closure is unnecessary, since the weather has already closed most of that season. If you were going to have a closed season for recreational anglers, it would be better to do it during the summer cold water upwellings, when larger lethargic fish are much more vulnerable to sport divers. I would support a May-July closure to sport divers of snapper/grouper. There are many more fishable days during that period, and this would protect the more valuable, larger fish when they are most vulnerable to sport divers. I think this would be a much more effective plan, and there are many pelagic species available to recreational anglers during that time, and it would minimize the economic impact.

Once again, I would like to point out that the MRFSS data is completely out of line with reality. If you check the weather buoy historical data against the MRFSS data, you will see that it would be impossible to come up with the wave numbers shown during that time period. This is yet another piece of anecdotal information that indicates that the underlying data, specifically from MRFSS, and assumptions being made to manage the snapper and grouper fisheries is tragically flawed.

I would also ask you to look into the collection bias that exists, especially in the Red Snapper stock assessment. The majority of the fish caught and assessed were 1-7 years old, and the assessment points to a trend that there are not many older fish. The reason they are not seeing many older fish is because the data is biased by the fact that both the recreational and commercial fishermen tend to target larger aggregations of fish over artificial and natural reefs. They are easier to find, and easier to catch, and tend to be shallower. Red Snapper that are 1-7 years old tend to live in concentrated aggregations in these areas, and are the target of angler determined selective fishing pressure. Once snapper hit 10 years old, they tend to be more solitary and move off to more isolated and deeper areas. This is why they are not seeing many older larger fish. The data sample you are using to age the species is biased by the collection method.

Finally, the SAMFC is allowing 130 million pounds of biomass to be wasted by the commercial trawling fleet to support a 4 million dollar a year industry that is also doing damage to the snapper/grouper fishery habitats. While this wasteful and destructive practice is being permitted, there should be no consideration of closing the snapper grouper fishery without putting an end to this. Foreign imports, and skyrocketing operational costs have made commercial trawling economically unfeasible. If the SAMFC is serious about restoring the snapper/grouper fishery to levels that haven't been seen in generations, they will have to stop allowing the waste of 130 million pounds of

biomass, and the continued destruction of miles of reef and live bottom. One only has to look at the Oculina bank destruction to see how disastrous these practices are to the habitat.

I would ask the SAMFC to be look at information outside of MRFSS and the stock assessments to confirm that they are making wise decisions. I have attached some other anecdotal information, and would strongly encourage you to look at it.

Unfortunately, I will be unable to attend the meeting in Charleston this week, but I trust that you make wise and well informed decisions.

Sincerely,
John Barber

SAMFC has stated that through the intercept and phone surveys that MRFSS has indicated that there was an increase of 1.8 million recreational trips, and an increase of 4,300 for hire trips on the East Coast of Florida from 2006 to 2007. In part, this has led the SAMFC to determine the Snapper and Grouper fisheries are experiencing over-fishing, and draft proposals to close or limit this fishery. This was on the heels of 4 hurricanes that hit the state in 2004, gas prices that have risen over 150%, and a major downturn in the economy. If these numbers were accurate, I may consider supporting actions to limit pressure on these fisheries, but I have not seen any other piece of information, other than MRFSS, that indicates anything other than a 20-50% drop in fishing pressure on these species, and a general shift of fishing pressure to species and areas closer to shore.

Table 2. Annual Number of For-Hire Trips by State, 2000-07.

State	Year	Number Trips
East Florida	2004	198,004
East Florida	2005	200,910
East Florida	2006	173,465
East Florida	2007	177,725

Table 3. Annual Number of Private and Rental Trips, 2000-07.

State	Year	Number Trips
East Florida	2004	5,313,366
East Florida	2005	6,230,328
East Florida	2006	6,502,930
East Florida	2007	8,317,491

Source - South Atlantic Region Commercial and Recreational Trips 2000-08
 Prepared by Kate Quigley, Council Staff

I have made comments and statements on several occasions to council and staff members regarding the accuracy of these numbers, and have asked if there was a single piece of anecdotal data that would confirm such a historically large increase in fishing pressure. The only answer I have received is that the SAMFC acknowledges the data is anemic, and the MRFSS system is flawed, but that is all you have, and you plan on using this.

I have read about, or have received first hand information from marinas, fuel docks, towing services, boating supply stores, bait and tackle stores, boat dealers, fishing clubs, FWC, Coast Guard, tournament sponsors, charter captains/associations, repair facilities, boat manufacturers, tackle manufacturers, authors and editors of angling publications, and 100's of fishermen over the last 6 months, and they all indicate a decrease in firsthand fishing activity, and similar decreases in related industries. The estimate by MRFSS, and all the anecdotal data points to a 40-70% swing in estimated fishing pressure. Something is tragically wrong, and intellectual integrity would at least try to find out why there is an enormous difference in estimated and anecdotal fishing pressure. The latest version of the MS Act requires you to act upon overfished/overfishing conditions on these stocks. Public trust, and the intent of MS ask that you are very sure of your information before taking historic and unprecedented actions using all available information.

As a SAMFC council or staff member, you have a responsibility to make wise and informed decisions as stewards of our national fisheries. I only ask you to look beyond MRFSS best available, but admittedly flawed science, and check first hand with some of the sources closest and most connected to this fishery to confirm you are making the best possible decisions. The Blue Ribbon panel in its last review of MRFSS stated, "The designs, sampling strategies, and

collection methods of recreational fishing surveys do not provide adequate data for management and policy decisions". This should be reason enough to check other sources of information.

I would like to offer the following independent news articles addressing the price of gas and fishing pressure. I also would suggest you look at the last article, as it attempts to quantify human behavior trends related to recreational activities in national parks, and oil prices, along with other factors related to recreational/leisure activity trends.

From *NBC Nightly News* – 7/18/2008

HIGH PRICES FUEL CHARTER FISHING SLOWDOWN

<http://fieldnotes.msnbc.msn.com/archive/2008/07/18/1207793.aspx>
<http://www.msnbc.msn.com/id/22425001/vp/25719958#25719958>

Captains said they've suffered a 15 to 40 percent drop off in charter bookings this year. The wealthier clients are still calling, but increasingly the average person in Miami or Ft. Lauderdale hoping for a fun day on the water with his buddies can no longer afford it. "We're just not getting the big families like we would normally," said Bassett.

Greg Eklund, the captain of the "Cloud Nine," bemoaned a two-fold problem. "We're losing our profit margin and we're losing the number of customers that we have."

From *The Harris Poll* – 5/26/2004

WHAT EXPENDITURES HAVE BEEN REDUCED TO PAY MORE FOR GASOLINE

http://www.harrisinteractive.com/harris_poll/index.asp?PID=466

Base: Adults Who Cut Back on Products or Services to Pay for Gas

	Total
	%
Dining out	65
Driving in general (local trips, errands, joined a carpool, etc.)	56
Shopping for fun	53
Weekend trips	49
Recreation	43

From *Naples Daily News* – 1/1/2006

High gas prices have fishermen pooling their boats

http://m.naplesnews.com/news/2006/Jan/01/ndn_high_gas_prices_have_fishermen_pooling_their_b/

"The gas price increases have impacted everyone in our club," Gerstung said. "The reality of it is that if it costs an extra \$100 a day, it's not a deal-killer, but maybe you don't take three trips a month but only two."

From *Journal of Environmental Management* 80 (2006) 387–393

16-year downtrend in national park visits explained by watching movies, playing video games, internet use, and oil prices

<http://www.videophilia.org/uploads/JEM.pdf>

After many decades of iconic status in American family recreation, National Parks visits may be one casualty of a social change in values characterized by our increasing pursuit of electronic media entertainment. Increased use of video games, home movies, theatre attendance and internet combined with inflation adjusted oil prices explains the majority of the 16-year decline in per capita US national park visits

To: Kim Iverson

Subject: Don't support a bad plan - ask the Gulf Council to slow down

Dear South Atlantic Fisheries Management Council Member, I am very concerned about the proposed plan to allow commercial ocean fish farming in the Gulf of Mexico. As a partner in this plan, the South Atlantic Fisheries Management Council is responsible for ensuring that a poorly designed plan is not pushed through. Since it was last presented to the public, the Councils' plan has been drastically altered and it needs careful review.

As there are many unanswered questions about the impacts of ocean fish farming at a commercial scale in U.S. waters before, it is imperative that all aspects of this potential new industry are considered before it is introduced into the Gulf. Recently, the Government Accountability Office released a report calling for more research before establishing regulatory frameworks to permit ocean fish farming companies to begin operation. Given their limited resources, the Gulf Council and South Atlantic Council are not prepared to take on this task alone. Furthermore, it is unclear whether or not the Councils actually have the legal authority to establish regulations for offshore fish farming.

The American public needs to know how an ocean fish farming industry in U.S. waters would affect their health, the environment and coastal communities who rely on fishing and the health of the oceans for their livelihood before regulations are created. I am very concerned that the current plan does not adequately address these issues. I strongly urge the South Atlantic Council to not support the Gulf's plan until the necessary research is done to ensure the public's needs are met. A hastily or poorly designed plan to open our waters to ocean fish farming could have unintended consequences. The South Atlantic Council should not support such a plan.

Sincerely,

Sherry Lewis

POB 625

Woodstock, GA 30188

Good morning,

My name is Robert Preston. I live in Jacksonville, Florida. I wanted to make a comment about the SG Admendment. I think it would be a terrible mistake to restrict anglers from pursuing these fine species. I am very much involved with fishing and I think that the fishing now is very good. The past regulations that was put in place before have worked well. An angler can catch their limit pretty easily in their favorite spot. There are also a lot of people that depend on these species for their living. Shutting down the fishing on certain species would put a lot of people out of business and the economies of some coastal communities would suffer.

I know you have a lot to think about with this Admendment. Please consider what I have wrote as one of the factors towards a decision.

Thank you,

Robert C. Preston