

From: [Dave Heil](#)
To: [SGAmend24PHcomment](#)
Subject: 24 comments
Date: Monday, November 21, 2011 9:31:47 PM

FLORIDA SALTWATER ANGLERS

We urge the SAFMC to adopt the following positions:

Amendment 24 – Red Grouper

Action 1. Maximum Sustainable Yield

We support Alternative 1 – no change

Action 2. Minimum Stock Size Threshold (MSST)

We support Alternative 1 – no change

Action 3. Rebuilding Schedule

We support preferred Alternative 5 (Preferred) the 10 years rebuilding time period ending in 2020. 2011 is Year 1.

Action 4. Rebuilding Strategy and Acceptable Biological Catch

We support Alternative 2 which sets the mortality at the rebuild level for 10 years

Action 5 Allocations

We support the preferred Subalternative 2e Commercial = 44% and recreational = 56%

Action 6 Annual Catch Limits and Optimum Yield

We support Alternative 1 -No Action

Action 7. Specify a Commercial Sector Annual Catch Target

We support preferred Alternative 1 -No Action

Action 8. Specify a Recreational Sector Annual Catch Target

We support Alternative 1 -No Action. Do not specify a recreational ACT for red grouper. The preferred alternative of not setting an ACT for commercial and setting one for recreational anglers effectively reduces their allocation by 25%.

Action 9. Specify Commercial Accountability Measures for Red Grouper

We support preferred Alternative 2 prohibit sale once commercial ACL is met.
We support preferred Alternative 3 If the commercial ACL is exceeded the following season is reduced by the amount of the overage.

Action 10. 10. Specify Recreational Accountability Measures (AMs) for Red Grouper

We support Alternative 1 - No Action

Dave Heil
President
Florida Saltwater Anglers, Inc.

From: [islandcharters](#)
To: [SGAmend24PHcomment](#)
Subject: Amendment 24-Red Grouper
Date: Saturday, November 19, 2011 8:11:34 AM

My name is Captain Bill Welder and I have fished for 50+ years. I primarily fish out of Key West Florida. I believe that the further restriction on the recreational catch of Red Grouper is unnecessary as the population is at an all time high.

Amendment 24 - Red Grouper

Action 1. Maximum Sustainable Yield

I support Alternative 1 - no change

Action 2. Minimum Stock Size Threshold (MSST)

I support Alternative 1 - no change

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I support Alternative 1 - No Action

From: [Jo Ser](#)
To: [SGAmend24PHcomment](#)
Date: Monday, August 22, 2011 11:53:31 AM

no

From: [Tim Totaro](#)
To: [SGAmend24PHcomment](#)
Date: Friday, November 18, 2011 11:03:13 PM

My name is Timothy Totaro and I have fished for 45 years. I primarily fish out of Port Canaveral and Ponce inlet. I believe that the further restriction on the recreational catch of Red Grouper is unnecessary as the population is at an all time high.

Amendment 24 – Red Grouper

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From: [Boo Olmstead](#)
To: [SGAmend24PHcomment](#); [UNEXPECTED_DATA_AFTER_ADDRESS@.SYNTAX-ERROR](#)
Subject: MORE GOVERNMENT
Date: Tuesday, August 02, 2011 8:37:14 PM

Why don't you all just come tell us the true your objective is to ban fishing from the Carolinas to Florida! It's more like manatees in the waterways in Florida a cash cow. We just could ban boating that would make everybody happy. Every other year there is another species you'll are going to save. Why don't you'll get on the cruise ships dumping waste or something worth while?

From: [Don](#)
To: [SGAmend24PHcomment](#)
Subject: Red Grouper or any other species
Date: Saturday, November 19, 2011 6:50:10 PM

My name is Don Newhauser and I have fished for 62years. I primarily fish out of Port Canaveral. I believe that the further restriction on the recreational catch of Red Grouper is unnecessary as the population is at an all time high. I further believe that the safmc has no remorse regarding the commercial/recreational fisherman they have harmed and that you people have no conscience. There is no way I could live with myself doing what you have done. I am not sure what your motives are but I know your decisions do not have the American people in mind. It is a sad day in America, when people such as yourselves are aloud to make these kind of decisions. From the first scoping meeting I attended I heard that the data was flawed.

Shame on all of you. I have no respect for you or your positions.

Amendment 24 – Red Grouper

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I support Alternative 1 - No Action

From: [Lee Lindsay](#)
To: [SGAmend24PHcomment](#)
Subject: Red Grouper
Date: Saturday, November 19, 2011 7:43:04 AM

My name is Lee Lindsay and I have fished for 5 years. I primarily fish out of Port Canaveral. I believe that the further restriction on the recreational catch of Red Grouper is unnecessary as the population is at an all time high.

Amendment 24 – Red Grouper

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I support Alternative 1 - No Action

From: [Jo Ser](#)
To: [SGAmend24PHcomment](#)
Subject: Red Grouper
Date: Saturday, August 20, 2011 11:26:40 AM

The Red Grouper The South **Atlantic** population is below target levels (overfished) and should not be opened this year.

DIRECTED SUSTAINABLE FISHERIES, INC.

A Consulting Company

Bob Mahood, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

September 01, 2011

Regards: Snapper Grouper Amendment 24

To: Bob Mahood,

Directed Sustainable Fisheries, Inc. (DSF) on behalf of our clients will submit this written comment about the Snapper Grouper Amendment 24 rulemaking effort consisting of eight Actions with various Preferred Alternatives and/or Subalternatives. We are concerned about the red grouper science that was conducted during the SouthEast Data, Assessment and Review (SEDAR 19) process, and the preferred alternatives for actions in Amendment 24 that affect the allocation percentages.

The recent cancelation of the Florida public hearings last week makes it more difficult to properly comment with clarity during this phase of rulemaking, especially since this document may have allocation issues. The SAFMC has rescheduled public hearings in Florida for November 15-17, 2011. We hope that our concerns being submitted in this comment will make a difference by the November public hearings as per allocations to the two sectors.

Based on discussions with Council member Captain Ben Hartig and Council staff, there is a need to seriously readdress the formula used to develop the allocations for commercial and recreational fishing sectors. The Marine Recreational Fisheries Statistics Survey (MRFSS) is dominating the three years [2006-2008] landings stream used in part to develop the allocation formula preferred in Amendment 24. It has been suggested that using analysis for more than three years would be warranted. Such an action should include 2009 and 2010 red grouper landings.

It appears we will have to wait until late this fall to see how the Marine Recreational Information Program (MRIP) will compare to the MRFSS recent past estimated annual landings. These inputs will probably change future assessment modeling and the rebuilding plans after the MRFSS and MRIP differences are clearly identified.

Below, copied from the Summary prepared for Amendment 24 are the proposed Actions. We will explain as best as we can where we disagree with some of the Council Preferred Alternative and Subalternative choices for Actions.

Proposed Actions in Amendment 24

1. Maximum Sustainable Yield

DSF is not sure the MSY is set high enough since we have issues with the SEDAR 19 red grouper final assessment results, in part because of the MRFSS data problems and evidence of stock separation due to the spatial difference between large red grouper catches in South Florida

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and North Carolina, and little else as per landings in between. It was suggested that the stock should be examined with "spatially explicit models" to help reduce the uncertainties. We also tend to disagree with the Preferred Alternative 2 for Action 1 because we do not trust the Beaufort statistical catch-age model (BAM) forward reconstruction assessment of fish populations. The BAM's reputation of negative results with recent SEDAR stock assessment efforts is shaping our thoughts and comments. Dependency on unrealistic historic catch assumptions and extreme MRFSS catch estimates not corrected by MRIP yet and then used as reliable inputs to the modeling tends to produce unreliable BAM outputs from the modeling efforts.

There is a failure by the NMFS analysts to conduct continuity runs in some cases and choosing to not utilize backward reconstruction assessment efforts such as the virtual population assessment (VPA) models for comparison purposes as suggested by Dr. Carl Walters during SEDAR 10 for gag grouper. "Never rely on any one assessment procedure." This behavior has become the norm for NMFS in the Southeast as of late and needs to be corrected. They may point at attempts with the surplus production modeling, but in recent years, those results keep getting kicked to the curb, including with red groupers SEDAR 19.

Finally there are not enough NMFS analysts available to conduct full benchmark assessments, standard assessments or updates for so many snapper & grouper species where it is needed, and there will not be enough lead analysts for years to come it appears to us.

2. Minimum Stock Size Threshold

DSF is not confident that the MSST is correctly calculated because we have had issues with the SEDAR 19 final assessment results for red grouper to set MSY.

3. Rebuilding Schedule

DSF is not sure that the rebuilding schedule is accurately set because we have issues with the SEDAR 19 final assessment for red grouper because of the BAM results setting MSY.

4. Rebuilding Strategy and Acceptable Biological Catch Levels

DSF supports a ten-year rebuilding plan to reduce short term impacts to the fishing communities. We are concerned that the ABC is being set too low because of SEDAR 19 MSY.

5. Allocations

DSF disagrees with the Alternative 2, Preferred Subalternative 2e for Action 5. The formula utilized seems to heavily favor the recreational sector with 60% of the ABC and appears to be driven by the MRFSS landings for 2006-2008. The formula needs to be recalculated and should include more than the three years used, and should utilize 2009 and 2010 landings also.

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6. Annual Catch Limits and Optimum Yield

DSF supports the Preferred Alternative 2 to have $ACL = OY = ABC$. DSF supports both Preferred Alternatives 5 and 6 to eliminate the aggregations of black, gag and red groupers effecting commercial and recreational sectors.

DSF does not support setting the ACL's until the allocation formula is revisited.

7. Accountability Measures for the Commercial Sector

DSF supports Alternative 2 to specify individual Annual Catch Targets (ACT) for red grouper, and DSF supports Preferred Subalternative 2a to not establish a commercial sector ACT.

DSF supports Preferred Alternative 3 that if the ACL is met or is projected to be met, all subsequent purchase and sale of red grouper is prohibited and harvest and/or possession is limited to the bag limit.

DSF supports Preferred Alternative 4 that if the ACL is exceeded, the Regional Administrator shall publish a notice to reduce the ACL in the following season by the amount of the overage.

8. Accountability Measures for the Recreational Sector

DSF supports Alternative 2 to specify an ACT. DSF supports Preferred Subalternative 2d to have the ACT equal $ACL * (1 - PSE)$ or $ACL * 0.5$, whichever is greater.

DSF supports Alternative 3 to specify the AM trigger. DSF supports Subalternative 3b that if the annual landings exceed the ACL in a given year.

DSF supports Alternative 4 to specify the in-season AM. DSF supports Preferred Subalternative 4b so that the Regional Administrator shall publish a notice to close the recreational sector when the ACL is to be met.

DSF supports Alternative 5 to specify the post-season AM. DSF supports Preferred Subalternative 5g for Payback. If the ACL is exceeded, the Regional Administrator shall publish a notice to reduce the ACL in the following season by the amount of the overage.

Rusty

DIRECTED SUSTAINABLE FISHERIES, INC.

A Consulting Company

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Directed Sustainable Fisheries, Inc. (DSF, Inc.)
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Saltwater Fisheries Consultant
Shark Specialist
Deep-Sea Fisherman and Shrimp Boat Captain
Recreational, For-Hire & Commercial Fishing Life Experience, 1959-2011
Retired 100-ton United States Coast Guard (USCG) Licensed Sea Captain
Seafood Coalition (SFC) member
National Marine Fisheries Service (NMFS) Highly Migratory Species (HMS) Advisory Panel (AP) commercial member
Atlantic States Marine Fisheries Commission (ASMFC) Coastal Shark (CS) AP Florida (FL) commercial & for-hire recreational member
Former South Atlantic Fishery Management Council (SAFMC) Marine Protected Area (MPA) AP FL commercial member
Former NMFS Atlantic Large Whale Take Reduction Team FL member (ALWTRT)
Former NMFS Bottlenose Dolphin Take Reduction Team FL member (BDTRT)
Current American Elasmobranch Society (AES) member

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From: Chris McCaffity [<mailto:freefish7@hotmail.com>]

Sent: Sunday, November 20, 2011 10:12 AM

To: Kim Iverson; Kim Iverson

Subject: Please submit these comments in the public record and forward them to the council members

Public Comments Regarding Amendment 24

My name is Chris McCaffity. I am a commercial fisherman who has been offering common sense solutions that would mitigate the severe negative impacts associated with regulations passed by the South Atlantic Fishery Management Council that fail to comply with many of the mandates in the Magnuson-Stevens Act. I have ZERO confidence in the SAFMC's ability to properly manage ANYTHING! The minions of environmental "charities" like Pew and EDF along with their puppets in the leadership of the multiple layers of fishery bureaucracy are either grossly incompetent or they are maliciously mismanaging our fisheries in an attempt to advance other agendas.

Roy Crabtree has stated that the South Atlantic snapper/grouper fishery will be managed much like the Gulf. He said they will start with derby fisheries to "manage" the reduced quotas and then "try" Trip Poundage Limits before using catch shares to "save" our fisheries. The proper use of TPLs would achieve all of the honorable goals of catch shares without the "unintended" consequences like fleet reductions that destroy an average of 1/3 of the permit holder's businesses in every fishery catch share schemes "help". I do not believe for one second that the SAFMC has given up on catch shares even though they voted not to continue pursuing them. I believe the leadership is simply giving their feeble attempts at TPLs a chance to fail. The Vermilion Snapper fishery is a perfect example of how their versions of TPLs are set up to fail. They did nothing to extend the season or limit Regulatory Discards compared to a derby fishery.

Amendment 24 follows the pattern Roy Crabtree planned for. They are planning to "manage" the Red Grouper quota as a derby fishery and warn us that this WILL cause the fishery to be shut down early! Next year they are planning to use a Regulatory Amendment to implement their version of TPLs. If past TPLs are any indication of how they will be set up for Red Grouper, the TPLs will be set up in the most incompetent way possible. After their lame versions of TPLs fail, they will say they have tried everything else and catch shares are the only solution left. This seems to be more malicious than incompetent.

I again publicly call on Congress to pass a bill that will allow permit holders in a federal fishery to have final approval of all Amendments with a 2/3 majority vote. We should have access to all documents available to the councils and come up with alternative management plans using the existing Total Allowable Catches while following ALL of the mandates in the Magnuson-Stevens Act. Congress should set up a peer review panel to insure all management plans submitted by the regional councils and the permit holders comply with the MSA. All existing regulations should be reviewed by the panel and allow the permit holders to offer alternatives for the regulations that fail to comply with the MSA.

This is how the Red Grouper fishery should be managed.

1. The way the council split the quota between recreational fishermen and consumers should be reversed. The council in their infinite wisdom decided to allocate about 400,000 pounds of the quota to recreational fishermen even though their average annual catch is only about 150,000 pounds. The commercial quota will be set at around 300,000 pounds even though our annual catches average about 400,000 pounds. REALLY! This is the height of bureaucratic incompetence. Anyone with half a brain could look at those numbers and know they should be reversed. That would still give recreational fishermen a quota that is twice their average annual catch. That still seems a little unfair to the consumers of Red Grouper, but at least it makes much more sense.
2. The size limit for Red Grouper should be removed and the quota increased as the waste associated with size limits ends. Removing only the larger breeding stock of fish leads to truncated stocks and reduces the overall health of a fishery and the average size of the fish in it.
3. The commercial Red Grouper quota should be PROPERLY managed with possession limits instead of creating another derby fishery that threatens our safety at sea, creates Regulatory Discards, and denies consumer's access to Red Grouper for long periods. Here is how the TPLs should be set up.
 - A. Set a 100 pound by-catch allowance during the four month spawning season closure. This would keep fishermen from targeting Red Grouper during the spawning season, but we could make efficient use of those we accidentally catch. Those fish would create revenue and feed people instead of TONS of them slowly dying and going to waste. The circle hooks fishermen are now forced to use break a fish's jaw if they are not removed properly. Those poor fish slowly starve to death if infection or decompression damage does not kill them first.
 - B. Set a 1,000 pound Trip Poundage Limit until approximately 75% of the quota has been caught. The TPL should then be adjusted to level that would fill the quota without a long closure. Here are examples of how the TPLs should be adjusted.

The TPL should remain at 1,000 pounds if there is only one month left in the season.

The TPL should be decreased to 100 pounds if there are six months left in the season.

The TPL should be decreased to 200 pounds if there are five months left in the season.

The TPL should be decreased to 300 pounds if there are four months left in the season.

The TPL should be decreased to 400 pounds if there are three months left in the season.

The TPL should be decreased to 500 pounds if there are two months left in the season.

I understand Roy Crabtree's point that the SAFMC cannot adjust the TPL when EXACTLY 75% of the quota has been filled. They can however, adjust it after somewhere between 70 and 80% of

the quota has been filled. The reduced TPLs would make it easier to extrapolate when the quota will be filled. This will extend the season through most of the year and limit waste.

The stock of Red Grouper and everything living in the same areas could be helped greatly with an aggressive Artificial Reef program. They are the perfect union of aquaculture and commercially harvested wild fish. We should be allocating some of the National Marine Fisheries Service BILLION dollar annual budget to enhancing the resource rather than just trying to restrict the public's access to OUR PUBLIC RESOURCES. The money appropriated to advancing the catch share scheme that very few fishermen support could be used to create new habitat. With all of their decades of collective college education, the fishery "managers" should know the three key things needed to increase a stock of fish.

1. Increase the amount of food available.
2. Increase the amount of shelter available.
3. Predatory stress invokes a reproductive response.

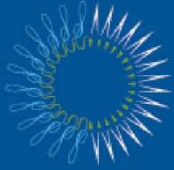
Artificial Reefs create the base of the food chain and could greatly increase the total biomass our South Atlantic could support. They would not only increase the amount of seafood available for harvest, they would help corals, turtles, and everything else that lives on and around structure.

Why do the fishery bureaucrats refuse to help the fish, fishermen, and consumers? Why are ALL of the laws they pass aimed at restricting our freedom, destroying our jobs, wasting our resources, and denying consumer's access to safe American seafood? Could the Saltonstall/Kennedy tax on imported seafood have something to do with the bureaucracy wanting to import more seafood rather than increasing the amount of American seafood available to consumers? That tax revenue should be used to enhance our fisheries and promote the domestic supply of seafood. What is it being used for now?

The plans I laid out would follow all of the mandates in the MSA and help the Red Grouper stock rebuild from decades of gross mismanagement with very little if any negative impacts to the fish, fishermen, or consumers.

Please forward these comments to anyone you think might be interested in properly managing our public resources.

Please contact me if you have any questions. freefish7@hotmail.com



THE
PEW
ENVIRONMENT GROUP



SOUTH ATLANTIC FISH CONSERVATION CAMPAIGN

www.PewEnvironment.org/SouthAtlanticFish

November 10, 2011

Mr. Robert Mahood
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

RE: Public Hearing Comments on Amendment 24 (Amendment) to the South Atlantic Fishery Management Council's (Council) Snapper Grouper Fishery Management Plan (FMP) – Red Grouper Rebuilding

Dear Mr. Mahood,

On behalf of the Pew Environment Group we would like to offer comments on the public hearing draft of Amendment 24 to the snapper grouper FMP. This amendment will implement annual catch limits (ACL) and accountability measures (AM) for red grouper as well as rebuild the population. Red grouper has been overfished and undergoing overfishing since at least 1976¹ (see figures 1 and 2 below). In 1991 the stock was declared to be experiencing overfishing (the overfished status was unknown) and the size limit was increased from 12 inches (set in 1983) to 20 inches. With only this size limit in place from 1983 to 2009, the fishing rate reached five times the sustainable level and the biomass plummeted to 20% of the level that indicates a depleted fishery. (See figures 1 and 2)

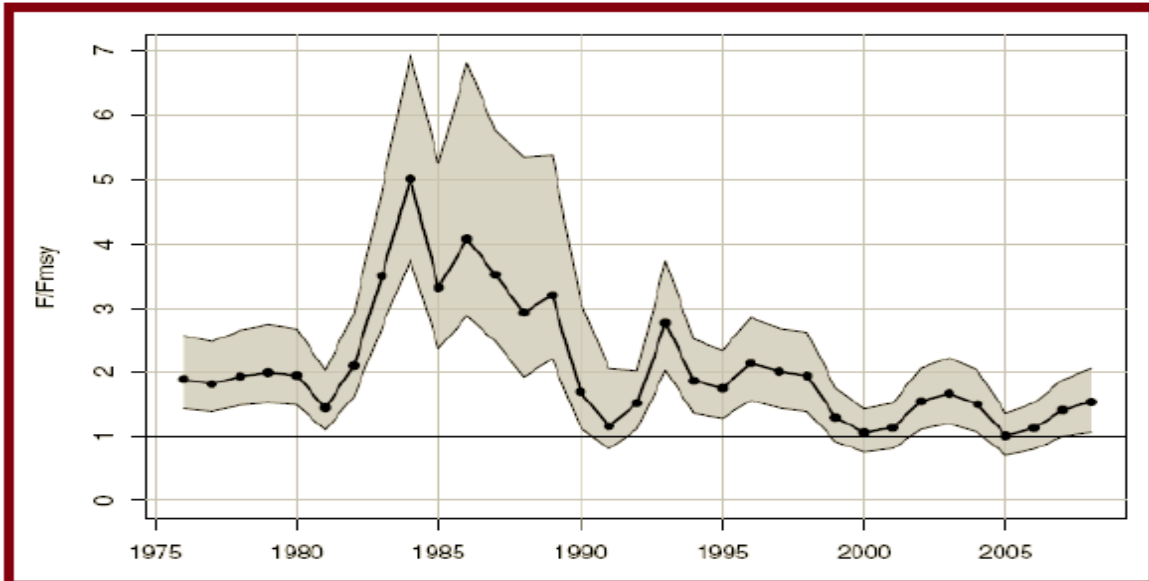
When Congress reauthorized the Magnuson-Stevens Fishery Conservation and Management Act (MSA), it closed loopholes in the law that had allowed the severe depletion of some species like red grouper to continue for decades. For example, because no formal stock assessment for red grouper was undertaken until 2009, no hard limits on catch were required, and the red grouper population reached dangerously low levels. In the last 3 years, red grouper were afforded some extra protections including a closed spawning season, and an aggregate catch limit combined with gag and black grouper. However prior to 2009, effort controls alone proved incapable of sufficiently controlling mortality on the fishery. Precautionary, species specific ACLs along with AMs are necessary in order to end and prevent overfishing of red

¹ SEDAR 19, 2009

grouper in the South Atlantic. The Amendment with the current preferred alternatives takes several positive steps to

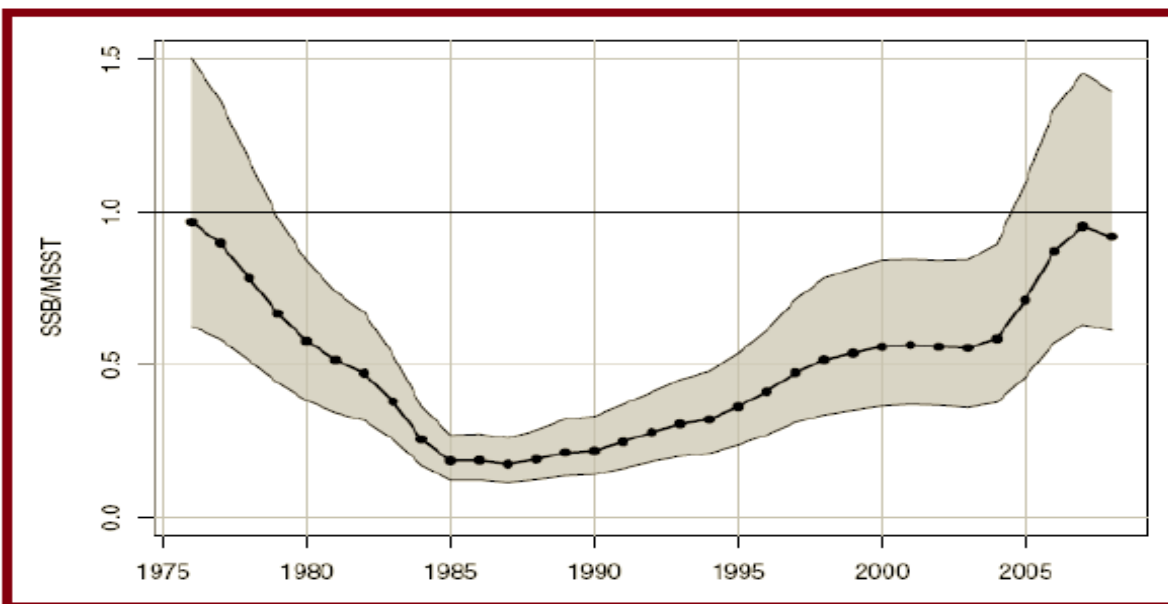
correct these problems and meet the requirements of the MSA. However, we are concerned that the AMs for the recreational fishery are not appropriate and we strongly urge the Council to revise its AM triggers in action 10 in order to end the chronic overfishing of red grouper.

Figure 1. Red grouper has been undergoing overfishing since 1976²



The graph shows the rate of fishing consistently above the overfishing level since 1976.

Figure 2. Red grouper has been overfished since 1976³



² SEDAR 19, 2009

³ Ibid.

The graph shows the biomass of the red grouper stock has been below the overfished level since 1976.

We are pleased to see the Council depending on the advice of its science and statistical committee for things like the allowable biological catch (ABC) and the recommendation that the rebuilding plan have at least a 70% chance of success. We are also pleased to see that the preferred rebuilding plan has a 72% chance of successfully rebuilding the population in 8 years, thus meeting the recommendations of the SSC.

Accountability measures (including annual catch targets (ACT)) are critical to ending and preventing overfishing. ACTs are described in NOAA's technical guidance on National Standard 1 (NS1) as,

*"an amount of annual catch of a stock or stock complex that is the management target of the fishery, and accounts for management uncertainty in controlling the actual catch at or below the ACL. ACTs are recommended in the system of accountability measures so that ACL is not exceeded."*⁴

The current system of monitoring clearly does not provide perfect real-time control of the recreational fishery, and so an ACT that accounts for management uncertainty is appropriate.

We support the preferred alternatives in action 8, which address ACTs for the recreational sector. The preferred alternatives use the ACT control rule to set the ACT buffer equal to the uncertainty in the recreational data. For example, the uncertainty in the red grouper data is 25%, and so the ACT buffer for management uncertainty is a 25% buffer. NS1 also states that,

*"the primary function of this [ACT] control rule is to account for management uncertainty and to serve as the target for inseason management actions."*⁵

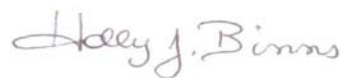
Yet the preferred alternative in action 10 (designating AM triggers) is to use the ACL as the target for inseason management actions, and not the ACT. In this alternative (2b), AMs would only be triggered if the ACL is met, instead of the ACT. While the ACT and ACT control rule are necessary and appropriate, with this preferred alternative, the ACT does not function as intended and fails to account for management uncertainty, and therefore may not adequately end and prevent overfishing.

We would like to thank the Council for accepting our comments on this critical amendment, and we look forward to continuing to work with you on an amendment that will create a vibrant and sustainable red grouper fishery.

Sincerely,



Sera Harold Drevenak
Science and Policy Analyst
Southeast Fish Conservation Campaign
Pew Environment Group



Holly Binns
Director
Southeast Fish Conservation Campaign
Pew Environment Group

⁴ 50 CFR Part 600 (f)(2)(v)

⁵ 50 CFR Part 600 (NS1), response to comment #38

From: [Mark & Susan Scaglione](#)
To: [SGAmend24PHcomment](#)
Subject: red grouper
Date: Saturday, November 19, 2011 6:41:22 AM

My name is Mark Scaglione and I have fished for 40 years. I primarily fish out of St.Petersburg,FL . I believe that the further restriction on the recreational catch of Red Grouper is unnecessary as the population is at an all time high.

Amendment 24 – Red Grouper

Action 1. Maximum Sustainable Yield

I support Alternative 1 – no change

Action 2. Minimum Stock Size Threshold (MSST)

I support Alternative 1 – no change

Action 3. Rebuilding Schedule

I support preferred Alternative 5 (Preferred) the 10 years rebuilding time period ending in 2020. 2011 is Year 1.

Action 4. Rebuilding Strategy and Acceptable Biological Catch

I support Alternative 2 which sets the mortality at the rebuild level for 10 years

Action 5 Allocations

I support the preferred Subalternative 2e Commercial = 44% and recreational = 56%

Action 6 Annual Catch Limits and Optimum Yield

I support Alternative 1 -No Action

Action 7. Specify a Commercial Sector Annual Catch Target

I support preferred Alternative 1 -No Action

Action 8. Specify a Recreational Sector Annual Catch Target

I support Alternative 1 -No Action. Do not specify a recreational ACT for red grouper. The preferred alternative of not setting an ACT for commercial and setting one for recreational anglers effectively reduces their allocation by 25%.

Action 9. Specify Commercial Accountability Measures for Red Grouper

I support preferred Alternative 2 prohibit sale once commercial ACL is met.

I support preferred Alternative 3 If the commercial ACL is exceeded the following season is reduced by the amount of the overage.

Action 10. 10. Specify Recreational Accountability Measures (AMs) for Red Grouper

I support Alternative 1 - No Action

Thanks,

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