Jimmy Hull's Comments 11/01/2012

- The Cooperative Research Program (CRP) provides much needed data collection by utilizing both scientific and industry stakeholders' talent together in a time of limited funds and budgets. The industry can provide a more cost effective sampling vessel than the Federal Government and in the real stakeholder world of expertise.

- Thank you for the efforts on the yellow tail snapper emergency rule. This is an example of the council being fast on their feet and being able to turn on a dime, which is much needed in our fisheries management.

- The estimate of recreational landings is a very big problem. MRFSS was unreliable and MRIP is only marginally better. The estimates and manipulation of recreational landings is the biggest data collection problem and you need to fix it.

- The Golden Tilefish fishery was allowed to open with a 300-pound gutted weight trip limit late this year when the additional quota from SEDAR 25 became available. Next year when the new endorsement program starts I would recommend you implement an effort reduction plan to extend the season. Such as 2 weeks open then 2 weeks closed or even 1 week open and 3 weeks closed.

- The need for new MPA's for the protection of Warsaw groupers (WG) and Speckled hind grouper (SH) has not been proven nor has it been recently proven that WG and SH are in risk of overfishing. We should conduct a CRP, utilizing industry vessels and expertise with SEFSC and Florida scientists to collect data targeting WG and SH. Or open the fishery for limited harvest mini seasons to collect samples for analysis.

- ACL's should be adjusted as quickly as possible as soon as new information is available. Again the council needs to be fast on their feet.

- As for the Red Snapper fishery this year and in the future. The mini season is a much needed and appreciated small 1st step in correcting a mistake that was made by closing a healthy fishery that should have never been totally closed. Having mini seasons to harvest the ACL is the best way to open the fishery. I oppose a tag fishery for both commercial and recreational for red snapper. Further, the current CRP Data Collection Program in place this year for Red Snapper needs to be funded every year.

- As far as Regulatory Amendment 14 and measures for Greater Amberjacks, raise the trip limit to 1500 pounds since we are not fishing to OY . For Gray trigger fish, do not raise the minimum size limit and wait until the SEDAR 32 stock assessment results become next year before you make

any changes. As for Black Sea Bass (BSB) wait until the stock assessment updated results next year before you make changes. You have just corrected and eliminated the short derby BSB Pot Fishery. Give the new BSB management time before tweaking.

- Right whale interaction with the BSB pot vertical lines is now a non-issue. You have done the job by eliminating the risk with pot limits, trip limits, and most important the requirement to tend your gear and bring it back to shore with you.

- The Vermillion Snapper trip limit should stay at 1500 pounds and the bag limit should remain at 5 fish per person.

- I agree that we need some regional management of certain species but we also need regional science and stock assessments on those unassessed fish species.

- Blue Runners should be taken out of the Snapper Grouper FMP and become part of the Coastal Migratory Pelagics (CMP) FMP or be managed by the state of Florida.

- As far a dealer generic permits I feel having 1 federal dealer permit for most species is okay. However I don't feel you should create a separate new reporting bureaucracy. Use the same reporting system we have now but require weekly reporting and enforce it. When you get close to the ACL require daily reporting.

  The only Federal Dealer Report I make is HMS every 14 days, everything else is through the Florida Trip Ticket Program.

- Finally as the science catches up with the reality that most of our fisheries are healthy and sustainable we need to have access to the stocks and keep fishermen fishing. You need to quickly adjust ACL's for public access.

- Vessel Monitoring System (VMS) - If you require VMS for snapper grouper commercial fishing vessels you should require it for the head boat and charter boat for-hire sector also.

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