

# Public Reporting

## The South Atlantic Fishery Management Council

Public Comment Form



### Meeting

### Jan. 2023 Public Hearings for Snapper Grouper Regulatory Amendment 35

Submit Date	Submitted By	Location	Affiliation	Comment
1/7/2023	First Name: Chris Last Name: McCaffity Email: freefish7@hotmail.com	City: morehead city State: North Carolina	Commercial	Please reward fishermen for following circle hook and descending device requirements by reducing discard mortality projections and allocations. Red Snapper are tough fish that survive most releases when done properly. Please do not create more regulatory discards as a way to address the overpopulation of Red Snapper. Please increase our Red Snapper quotas rather than decreasing so there are fewer discards while providing better data. Discard data is based on speculation while landings are based on math. Please consider options for stocking Red Snapper and creating Hatchery Supported Quotas if you think we need more of them. It seems as if there are already enough Red Snapper to negatively impact other species. It is time we started using the resource wisely rather than planning to waste it. I am happy to answer any questions and/or provide more detail. Thank you.
1/9/2023	First Name: Carl Last Name: Kirby Email: ckirbysr@ec.rr.com	City: Southport State: North Carolina	Private Recreational, Commercial	<p>"I am both a recreational fisherman and a federal permit holder for snapper / grouper. I have worked as a part time commercial fisherman all my life and a recreational fisherman all my life. I strongly oppose the provision in Amendment 35 that bans the use of electric reels in the recreational fishing industry. This ban is both unnecessary and discriminatory.</p> <p>As a life long participant in both recreational fishing and commercial bandit fishing for snapper grouper, I have extensive experience using both recreational electric reels and commercial electric reels. Recreational electric reels do not have the power to force a fish up in the water column like commercial reels do. A fish caught on recreational electric reels must be played and fought just like a hand crank reel because these reels do not have the power to force the fish up in the water column. An experienced fisherman will know this. I believe misinformation is being used to unjustly support this unnecessary ban. I believe recreation electric reels are being portrayed as equivalent to commercial reels in power and use. This is wrong.</p> <p>This provision to ban recreational electric reels is also discriminatory. It unjustly discriminated against the elderly and the disabled. I fish with two elderly gentlemen and I know first hand they could not participate in this fishery without the use of electric reels. An elderly or disabled person could not hope to physically hand crank fish out of deep water where snapper and grouper are caught. We have all used recreational electric reels all our lives and to deny us the use of this equipment would directly eliminate the elderly and physically disabled from this fishery. I believe such discrimination would be found illegal if challenged in court. I would be willing to support such a challenge if this provision is included in this amendment."</p>
1/11/2023	First Name: Dave Last Name: Persaud Email: Dpersaud0683@gmail.com	City: Titusville State: Florida	Private Recreational, For-Hire	Your data collection is crappy and the sharks are out of control. Do something about the sharks first before making any changes

1/28/2023	<p>First Name: James Last Name: Hull Email: hullsseafood@aol.com</p>	<p>City: Ponce Inlet State: Florida</p>	<p>Commercial, For-Hire, Wholesale/Dealer/Retail</p>	<p>I have been a Red Snapper fisherman for over 55 years, It was my bread and butter until it was taken away. First comes Science then Management. All the SEDAR Stock assessments for Red Snapper have mis- characterized the age structure, Life History and Reproductive capabilities of Red Snapper. For the past 11 Years We have tried to better inform the Stock assessment scientist and the council appointed SSC to the realities of a fully rebuilt Red Snapper stock observed from the water. Why are you using an age based assessment/model for Atlantic Red Snapper? When clearly Abundance is the most important factor in Productivity and Recruitment Success of this stock. Most Red Snapper reach their maximum length at 8 to 10 years old or younger. Red Snapper are sexually mature at 2 years of age. The simulated age structure draw down of Red Snapper stock Biomass preceding 1978 is not supported by any empirical age -structure data. From a survey by Anderson et al. (1965) the authors report the average age of Red Snapper in the sport fishery from 1959 to 1962 was 8 lbs. or a 4 year old red snapper. During the SEDAR 73 assessment I asked how many Red Snapper over 20 years of age had been observed from the age readings. The response was that in the past 42 years 30,705 fisheries dependent samples have been taken. This resulted in only 141 Red Snapper over 20 years of age. This is a very small percentage that has nothing to stop this stock from rebuilding. The stock has all time record abundance and recruitment. It is clear that significant age classes into the population is that of an "r-strategist" population that is capable of significant recruitment events, with strong cohorts, irrespective of a older age Biomass. I believe it is inaccurate and a mistake to use age related spawning stock biomass as a indicator for stock status of this reproductively prolific Red Snapper stock. Clearly Abundance is much more important. I ask that you run a new assessment model based on abundance, recruitment and a more realistic maximum age of animals that contribute to the stocks success. But the Science has failed us.</p> <p>So now the council must deal with the results of SEDAR 73, Overfished and overfishing occurring. According to Best Scientific information available( BSIA) Over 85 percent of the available yield is dead discards fishing through out the year from the private Recreational sector.</p> <p>What should the council do and what can they do?</p> <p>They could start by appointing qualified Fisherman to the SSC and by vetting their other SSC appointments as to their use of common sense and an appreciation of reality. Hopefully you can have more accurate stock status thru assessments.</p> <p>Second You cannot have unlimited access to a limited resource. So the Snapper/Grouper (S/G) private recreational sector is overcapitalized There should be a limit on the number of Private Recreational S/G fisherman thru limited entry permits, just as was done to the S/G Commercial sector years ago when it was determined to be overcapitalized. You could close down year round access to Private Recreation S/G fishing by bottom or time closure. This could result in much more fish for harvest for the Private Recreational sector. You need to run the numbers and analyze these options. The fisherman might like what they see. Obviously Single hook rigs, venting and descending devises, along with education and public outreach is vital for turning dead discards into landings. If nothing is done to end overcapitalization and limit the Private Recreational S/G sector then all S/G fisheries will become DEAD DISCARD fisheries in the future.</p> <p>Thank You</p> <p>Captain James G. Hull Jr. Ponce Inlet Fl.</p>
1/31/2023	<p>First Name: Nicholas Last Name: Frazier Email: nfrazier@cfl.rr.com</p>	<p>City: Indialantic State: Florida</p>	<p>Private Recreational</p>	<p>As an avid fisherman and life long resident of Florida, I adamantly oppose the proposed regulation. Red Snapper are not over fished. They're over caught because they are overwhelming reefs and other structure. Improving angler education for venting and descending devices would improve snapper and grouper survival rates. Changing season dates to allow more days that are spread out throughout the year would also improve populations. This would remove the excess pressure of two or three days during the year. This proposal is a government overreach, attempting to further infringe on opportunities for South Atlantic outdoorsman.</p>
1/31/2023	<p>First Name: Nick Last Name: Stanczyk Email: Bnmcharters@gmail.com</p>	<p>City: Islamorada State: Florida</p>	<p>Private Recreational, For-Hire</p>	<p>Deep dropping is not practical with one hook when fishing in 500-1000' of water. It will severely hurt our charter fishing industry as well as our recreational boating industry</p>

2/2/2023	<p>First Name: Robert Last Name: Heater Email:</p>	<p>City: Melbourne Bch State: Florida</p>	<p>Private Recreational, Commercial</p>	<p>After attending the public meeting in person for Amendment 35 in Cocoa,Fl,I feel I must make some comments.I hold and use my SG1 permit out of Sebastian Inlet and occasionally Port Canaveral.I have harvested Red Snapper for over 57 years as a 10 year old child to present.My methods of harvest have been both diving and hook and line both recreational and commercial.After listening to our fellow fishermen from different sectors speak at the meeting I found that I agree with some of what was said and totally disagree with other comments.</p> <p>I agree that banning the multi hook rig will NOT greatly reduce the throwback mortality rate of the LARGER fish being from my experience that fish over 5 lbs are not caught as often on a chicken rig.What I got out of the meeting was the council feels theres still not enough larger older breeders.</p> <p>Some of the fishermen said they felt the Red Snapper season shouldnt be open during the summer because the fish are full of roe.I personally am thankful that the NMFS has opened the season in the summer being a small boat operator(under 30 ft.) it gives me an equal shot at the quota because of the better weather windows. Doing it during the winter would make it predominately a big boat fishery.My thoughts are if you keep a 20 lb fish,either a snapper or a grouper at any given time of the year with roe or not, you have removed a potential breeder.Catching fish with roe in it happens everywhere from 50 ft to 280 ft.off of Sebastian.So closing off an area to fishing because fish have roe would be a massive area.</p> <p>I feel the closest you are going to get to really reducing the release mortality rate since you are not going doing do something about the unbelievable Bull Shark and Sand Bar Shark populations is do more public education on how to properly use descending devices.I cannot believe the present rule on descending devises only requires a one pound weight.</p> <p>I have had large snapper and groupers floating full of gases at the side of my boat with 3 to 5 lbs. of lead attached to the rig.How do you expect a one pound weight to send back down that fish?My home made device uses an 8 lb weight and gets the job done.</p> <p>I am against venting tools the reason being that we have thousands of fisherman from both sectors who are not Marine Biologist.I do not care how many illustrated instructions there are or how many videos there are showing a person how to do it. It still goes very wrong many times.Whats suppose to be a venting turns out to be multiple stabbings,I have seen it with my own eyes.The fish is perforated and still floating.Yes there are a few who can do it properly but thats not enough.Its not always just the bladder that is full of gas.</p> <p>Now I must get to the high mortality rate that occurs when I fish for Red Snapper.</p> <p>It comes from the aforementioned shark problem. WHICH IS VERY REAL!!! After reading an article not too long ago that a scientist had written,he wrote that depredation by sharks is nothing new.I wanted to thank them for stating the obvious.Yes I have been losing fish to sharks both hook and line and spearfishing all my life.But they didnt mention the incredibly high rate that it has been happening in the last 3 years.I believe we have had a commercial Red Snapper season for about 5 or 6 years in a row now,the sharks getting worse each year at a rapid pace.I believe the NMFS grossly miscalculated how quickly the sharks would multiply.The first season [(we)were given a daily bag limit of 50 lbs.of Red Snapper then the rest of the following seasons it went up to 75 lbs. daily.The first 2 seasons if the weather and the sea conditions were good I could catch my limit in one hour 2 hours max and then move on to another fishery.The last few years the sharks became a problem.I was losing most of the larger fish because I could not retrieve them as fast and they were getting pick off by sharks and Goliath grouper. Sometimes right at the boat.</p> <p>I heard the same story over and over from other fishermen.If the fish was under 5 lbs you could pump them in fast enough but not the bigger fish unless you had hydraulics or were in very good shape.What took me 2 hours max in the beginning now takes me most of the day and the bag consist mostly small fish.Last year my participation in the open season fell way off.At my age battling 500 lb bullsharks that grab my fish dozens of times in one day has taken a physical toll on me.Stop worrying about what activist think,they cant have a clue whats really going on out there,please do something about it.</p> <p>Thank you Mike and all those concerned for your attention to this matter and thank you for coming in person to Cocoa,Fl.Could somebody either in NMFS or SAFMC please email me letting me know that this email was read and not just recieved?</p> <p>Robert Heater abheater@aol.com</p>