

Mr. Strelchek; et al. They say a picture is worth a thousand words. The truth is i am not sure that will be adequate for the attached picture. The captain is obviously very good at his job and for that he can only be commended for utilizing what the SAFMC deems sustainable. What is important is the fact that this impressive catch even to a commercial fisherman is allowed by 44 permitted for hire vessels out of my inlet alone. And when one does this, the pressure is on for all of them to do this.....every day that they can. And in reading the public document for the Sept Council meeting as of the year 2019 there are now 2183 for hire permits in the S.A., or up from 1759 permits in 2015.....AND COUNTING! In 2006 when A13C put me out of the fishery there was one headboat and perhaps a few 6 pack licenses that on a rare occasion might partake.

As for the photo above, the catch itself is worth another chapter. First you have a 50lb. snowy which certainly throws a monkey wrench in to that 8.8lb. catch at intercept. After all, where there is one, there is plenty more....or USED to be on a fish potentially over 50 years of age. Actually i am now hearing even possibly as old as 80 years ? Secondly, the fishing power of the for hire industry is arguably equal too or greater than that of a industry boat even with a supposed lower bag limit. The fact is, they sail days most of us have better sense. Why you ask? Well it's because they likely have a deposit and make a day whether the weather or the fishing is fit or not. Simply put, if conditions don't seem right, we are unlikely to go offshore and burn the fuel that will take close to half of the snowy trip limit (200lbs.) simply to get there and back which is probably why we didn't land our ACL this year. By design perhaps???

The next item in the photo is a limit of tilefish. Now while i admit i was not on that boat, i can promise you the vessel was either out front or south of our inlet with the composition (be liners) of the catch. And after 25 of my 45 years on the water bottom fishing, i can tell that try as he might the discards (?) of snowy with that catch of tilefish are SIGNIFICANT. Again, i am not disregarding the potential millions of private rec.s here either by insinuating that the present condition of the fishery is all the for hires fault.....on and ACL of 1668 fish. I mean after all....in the a.p. discussion this past year, it became apparent that is likely caught in Fla. state waters alone where a recreational angler can catch snowies to the tune of 1 per person on a jet ski all year long. In fact back when the ACL was 523 fish between 2006 and 2014, one captain admitted catching the entire ACL by himself one year!

Now the next item up is triggerfish or another species with clouds on the horizon. Would someone please tell me why does an angler need 10 to have a good day, especially knowing there were likely red snapper caught and discarded in conjunction. One could certainly conclude a very substantial reduction in discard mortality on RS with a simple bag limit reduction as well as benefits to the stock as well. Perhaps it would allow the rec anglers to even get to actually keep a RS for more than one day a year.

As for the B liners, frankly i would say that bag limit is about right. But still , there is something missing in this picture that also raises a very important question. Where are the sea bass that 16 years ago i would have caught anywhere along that same area? Could it also be due to the absurdity of having allowed a former chairman

seeking a higher bag limit for his recreational crowd to increase the size limit to 12"s? Then again, is it due to climate change or perhaps from reading through the public record (been doing a lot of that lately Mr Strelchek) the A.P. concern of red snapper and BSB not being compatible. One thing is a fact, there are a WHOLE lot of red snapper out there. In any event i guess it's up to somebody smarter than me to tell you when enough actually becomes way too many! In any event there are no sea bass in and area that used to be a valuable commercial fishery in my back yard.....what ever the cause.

1. The last statement brings me to this point which i would like someone within this group to answer. Since there is such significant concerns about the discard mortality in the recreational RS fishery .....to the point that the fishery may not even open recreationally this year i am told, then WHY is that same concern not prevalent in the snowy fishery.....a fishery far more vulnerable, with a rec. ACL 16 times SMALLER if my math is correct..... on a fish that you are unsure even about it's longevity.....with a one per boat bag limit..... with 100% discard mortality and yet the agency proposes a two month season with essentially a third thrown in with a three month tilefish season on a co occurring species .....which off Hatteras south to the Keys is usually a three to one ratio in favor of snowy....with tilefish having a bag limit of two per angler..... all the while using MRIP which is shown to be worthless with rare event species .....which i have shown is anything but rare anymore. Someone within this group please answer the plausibility of this actually ending overfishing.

2. Another question i would like answered that i have been unable to find out, what is the discard mortality assumed in both the rec and commercial snowy fisheries?

3. Question three, in reading through the public record, in the draft rationale....."while snowy is undergoing overfishing and is overfished the council decided to forego a precautionary buffer between the ACL and OY and the ABC and instead rely on the rebuilding plan established in 15A with management modifications to prevent overfishing and assure the stock is rebuilt within the rebuilding timeframe." My question is, what uncertainty arose in the implementation of 15a that created this present need for A51 to supposedly rectify by further diminishing a commercial sector already on life support?

Don't get me wrong. It's not that i disagree with the need for A51. IT'S JUST THAT THERE IS ONLY ONE UNCERTAINTY IN THIS WHOLE EQUATION and it's not the industry that keeps doing all the losing! And if it breaks me trying, using this industry as the conservation buffer by this council is going to stop. We have run out of the ability for charity. Furthermore I have been told (I haven't read it yet) that the A46 document mentions the possibly of having a rec. license by the year 2025 and possible reporting (UNVERIFIABLE) by 2027. Well in another four years there won't be a fishery left to make a living on in the commercial community with it's present trajectory. If this council ended up giving the whole commercial ACL on snowy right now to the rec. community with the proposed A51 rebuilding scenario as it is it STILL wouldn't be enough to rebuild this fishery on a totally unaccountable sector!

To quote Monica Smit Brunello: in the June 11th thru 16th 2022 SG meeting "if you don't address the overfishing, then yes it wouldn't comply with the Magnuson Act, but i would leave it up to the courts to decide what is illegal and what is not illegal"! End quote. Well since our industry has already been to court over snowy (13C) only to have the courts defer back to the council..... and now possibly see it back in the courts again? It might just make for a very interesting day provided all involved don't step up to the plate and uphold their sworn oath to manage this resource sustainably?

So Andy, you have a decision to make because we ALL know the council is NOT capable of making it.....then again it might just be easier to let the courts decide it! It's your call..... Finally Sir, i certainly don't envy your position nor do we in the industry take pleasure in going down this path. But clearly something has got to change..... We in industry simply have nothing left to give!

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