

# Public Reporting

## The South Atlantic Fishery Management Council

Public Comment Form



### Meeting

### June 2025 Council Meeting

Meeting information, including agendas and briefing book materials are posted here: <https://safmc.net/events/june-2025-council-meeting/>.

Submit Date	Submitted By	Location	Affiliation	Comment
5/31/2025	First Name: Chris Last Name: McCaffity Email: freefish7@hotmail.com	City: Morehead City State: North Carolina	Commercial	The continued mismanagement of commercial quotas is resulting in multiple extended closures and excessive regulatory discards. This waste of resources leads to discard assumptions and unreliable data collection that negatively impact stock assessments, fishermen, and seafood consumers. Please consider using By-catch Allowances rather than complete closures to manage quotas so we can target fish with higher limits without having to discard most of the fish we accidentally catch with lower limits. This simple solution would help the council follow Congressional mandates in the Magnuson-Stevens Act to limit waste, make efficient use of Public Resources, and promote the safety of fishermen at sea.
6/6/2025	First Name: Eric Last Name: Gafford Email: gtgeric@gmail.com	City: Pooler Ga State: Georgia	Private Recreational	Please do not completely close offshore reef fishing during the winter months! It will be debilitating!

6/9/2025	<p>First Name: Haley  Last Name: Stephens  Email: HaleyWStephens@gmail.com</p>	<p>City: Ponce Inlet  State: Florida</p>	<p>For-Hire</p> <p>Overview: Please take the follow input into consideration during For-Hire Reporting Improvement Plan discussion scheduled for June 10th 2025 SAFMC Council meeting.</p> <p>“Purpose: The purpose of this amendment is to make modifications to the South Atlantic Southeast For-Hire Integrated Electronic Reporting Program and the Southeast Region Headboat Survey to improve the accuracy, precision, and timeliness of landings, discards, fishing effort, and economic data for South Atlantic permitted charter/headboat vessels participating in the snapper grouper, coastal migratory pelagics, and dolphin wahoo fisheries.”  “Need: The need for this amendment is to improve compliance and allow for data validation so the information collected can be used in managing the fisheries for snapper grouper, coastal migratory pelagics, and dolphin wahoo”  Source: For-Hire Reporting Modifications; page 3; Decision Document June 2025</p> <p>SRHS Evaluation: “Estimated trips for headboats are determined from port agent reports of vessel activity. The compliance rate in the Atlantic jumped from just under 50% in 2007 to 82% in 2008 when selection letters were mailed to vessels. Compliance has been above 95% since 2010 and above 99% since 2017”  Source: Attachment 6a: South Atlantic Headboats Report; June 2025</p> <p>Key SRHS Takeaways  Headboats are already fulfilling both the Purpose and Need in the proposed rule changes  Therefore SRHS may fall outside the realm of both the Purpose and Need in this amendment  Headboats have a near perfect compliance rate under current management measures  Headboats are fulfilling data validation and information needs under current program that is utilized in management  “If it is not broke... Do not fix it...”</p> <p>SEFHIER Thoughts  In order to address the issues of SEFHIER, I would encourage Council to begin clarifying some of these questions:  Who is responsible for reporting? Is it the owner of the vessel, or the captain, or a crew member? Identify who is responsible.  How does accurate and up to date federal permit data (Snapper Grouper, Dolphin Wahoo, CMP) in the for-hire sector effect compliance rates?  Why compliance is so poor for vessels in SEFHIER program?  - Is it that users won't report?  - Lost trust in the system  - Fishers feel the data will be “used against them”  - Aren't educated in the important details of data collection / use in management  - Little accountability or enforcement if failure to report  — or —  - Is it that users can't report?  - Aren't equipped with technology means to do so  - Mental or physical restrictions to complete electronic reports  - Poor software makes trip reporting challenging, difficult, nearly impossible</p> <p>Additional Thoughts  More regulation alone may not lead to better compliance.  Managers should look to education and outreach resources, paired with better enforcement.</p> <p>We recognize that some parts of this amendment may be helpful and proactive, however some would be negative. Please see below for further explanation.  Draft Actions and Alternative Overview:  *Draft Action 1. Reporting Frequency and Timing  Rationale: Often times, headboats are carrying many many more passengers than a “6 pack” for hire charter boat.</p> <p>For my operation, it is common to run multiple trips a day during busy season — trip A returns at 12 noon and trip B departs at 1pm. We have a total of 1 hour to safely unload on average 50 passengers, distribute the catch, clean the catch, restock ice, restock bait, refuel (if needed) take out trash, clean the restrooms, clean the boat (sort of), fulfill souvenir orders, and check in our next trip of approx. 50 passengers, give safety speech and instruction, and safely load passengers onboard.</p> <p>Enforcing a change in reporting frequency and/or timing has the potential to force our business to alter our operation and/or schedule entirely. It's important for managers to recognize that the time in between trips is a critical time for captains to mingle with to with guests, answer questions, etc. which is a HUGE part of our angler satisfaction. Our customers are the most crucial of the success of our business; Replacing this important time with being forced to complete a trip report would not only be detrimental, but also unnecessary given the fact the current weekly time frame for the SRHS.</p> <p>It's unreasonable to make our guests stand around and wait to collect their hard earned catch, while we are filing a trip report. Angler satisfaction would plummet if this were the case.</p> <p>Alternative 2 also may lead to forcing captains to complete electronic reporting on a smart phone or similar device while operating vessel with passengers onboard in effort to remain in compliance with the a.) prior to offloading 2.) 30 mins or 3.) 1 hour proposed time changes. This may be viewed as a possible violation of MSA National Standard 10—Safety of Life at Sea: “Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.”</p> <p>Alternative 3 would effect our daily personal / family life. Our captain and crew leave the house around 4am, preform hard work in the sun all day long, and final returns home around 8pm, they have a very small window to see their kids before bedtime. Imagine spending the whole day at work, just to come home and have to prioritize staring at your smart phone or computer to complete a daily trip report over spending a few quality moments with your young children before bedtime. VESL is a generally user friendly software but it does still take 20-30 mins on average to properly complete each honest and accurate trip report for our headboat that ran 2 trips and carried over 100 passengers that day.</p> <p>Please note this is input from the perspective of a headboat. Opinions and perspective may differ for smaller, 6-pack for hire charter boats.</p> <p>Recommendation: Select Alternative 1 No Action for headboats in the SRHS.</p> <hr/> <p>*Draft Action 2. Require Trip Notification for For-Hire Vessels  Rationale: SRHS have dedicated NOAA Port Agents in the South Atlantic. We have constant 2-way communication (almost daily) with our Port Agent about our schedule</p>
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6/10/2025	First Name: Shawn Last Name: Dufault Email: alta2ski@aol.com	City: Fort Pierce State: Florida	Private Recreational	Living in Fort Pierce next to the Oculina Reef and knowing it's past history, it is inexcusable to imagine that you're going to open any area of it or near it again to trawler fishing. I oppose shrimp 11 amendment and coral 12 amendment for the damage it will do to the reef which is still in recovery stages. This reef is one of kind. How could you possibly ignore that and have it decimated again? It would seem as though other maritime rules would take over that situation so that a single council couldn't make that determination. As coral reefs around the world are dying please save this one from the hands of man directly. It would really be a crime to kill the Oculina Reef in this way. Thank you, Shawn Dufault
6/10/2025	First Name: Jason Last Name: vogelsong Email: captjandv03@yahoo.com	City: Jacksonville State: Florida	Commercial, Wholesale/Dealer /Retail	As a commercial fisherman in the rock Shrimp fisheries for the last 30 years, we are asking you to restore the historical rock shrimp area that we have been diligently working towards to reopen for the last 13 years. It has been unanimously voted upon to restore the historical rock shrimp areas. There is no need to waste any more time or money over the restoration of our historically operated rock Shrimp fishery. As there are more important agendas to look at referring to the lake Okeechobee runoff that is causing detrimental harm to the coral reefs from man-made pollution due to the removal of the lime rocks that are a natural filter for the lake Okeechobee allowing man-made chemicals to overflow and runoff into the Atlantic ocean towards the golf stream, headed straight for our coral reefs that bleach and kill our coral reef. and as they have concluded in all the agenda meetings that the rock Shrimp fisherman are not the cause of the killing of the coral reef as we have helped locate the coral reef for the scientists due to VMS tracking to let you know where they are when the marine biologist viewed our tracking data and ask why we did not troll in certain areas. so we are asking to restore our historical rock Shrimp fisheries. Thank you and have a blessed day
6/11/2025	First Name: Esther Last Name: Guzman Email: eguzman453@gmail.com	City: Fort Pierce State: Florida	Private Recreational	Please do not allow trawling in the Oculina Reefs. The reason the fish population has recovered is because this protected area serves as a breeding ground for fish. Oculina coral is a treasure that we have in FL and allowing trawling for rock shrimp will destroy the coral which is of importance as breeding grounds for fish and to maintain a healthy environment
6/11/2025	First Name: Rebecqa Last Name: Ducker Email: Rebecca1175@gmail.com	City: Fort Pierce State: Florida	Private Recreational	Please DO NOT open the reef for commercial nets.
6/11/2025	First Name: Priscilla Last Name: Winder Email: pwinder007@gmail.com	City: Fort Pierce State: Florida	Other	I strongly advocate for the committee to consider taking No action on the amendments and not re-open the Oculina Bank Habitat Area to bottom trawling. Decades of research have shown that bottom trawling has negative impacts on the slow-growing unique coral ecosystem. Dragging nets along the bottom will stir up sediments that can blanket the Oculina coral causing death. Any problems that may be encountered with the trawling equipment while underway can directly impact the coral reefs destroying thousand year old reefs. The buffer around the Oculina Bank Habitat Area was established based on scientific research and should be maintained.
6/11/2025	First Name: Richard Last Name: Mulroy Email: rmulroy@fau.edu	City: Stuart State: Florida	Other	Allowing trawling on the already endangered Oculina reef would be an ecologically disaster. It is short-sighted. Better to invest in aquaculture than destroy an ancient animal for little money.
6/12/2025	First Name: Brendan Last Name: Runde Email: brendan.runde@tnc.org	City: State: North Carolina	Private Recreational, Non-Govt Org (NGO)	I am writing to express my disappointment at the wholesale removal of the discussion of Amendment 46 and the associated presentation(s) from this meeting. Amendment 46 (and the issue of private recreational data in general) are extremely important topics. The management of many species under SAFMC control is impaired by the quality of recreational data. While I understand that the Council elected to postpone until December their decision of whether to send A46 out for public hearings, the presentation from NOAA OST on the National Saltwater Angler Registry would still have been valuable. The Council having the opportunity to review the Registry and its use and utility is a key step in the process of improving recreational data quality. Possibly this presentation will be given at a later Council meeting, but moving it at such a late stage is inconsiderate to Council members, staff, and presenters. Moreover, members of the public - myself included - traveled to this meeting with an expectation that the agenda would at least loosely reflect reality.  Brendan Runde The Nature Conservancy

6/16/2025	First Name: John Last Name: Reed Email: johnkreed48@gmail.com	City: Fort Pierce State: Florida	Private Recreational, Non-Govt Org (NGO)	<p>"June 11, 2025</p> <p>SAFMC Meeting Public Comment</p> <p>Re: Response to Oculina Habitat of Particular Concern (OHAPC) Proposed Coral Amendment 11 and Shrimp Amendment 12</p> <p>The attached document provides critical information that clearly shows why the proposed Amendments to allow shrimp trawling within the boundaries of the OHAPC must be denied. Alternative 1 (no action) which keeps the prohibitions against trawling within the OHAPC should be selected. The argument that the proposed Shrimp Fishery Access Zone (SFAA) should be allowed because this is the historical fishing grounds is absurd. Much of the Oculina habitat was the historical rock shrimp fishing grounds. During the first public hearing in Daytona in 1982 on the original OHAPC, the shrimpers were asked how they could trawl on the coral. They said they would make 'goat trails' by dragging their tickle chains between the doors of the trawls without the nets. They would widen these trails until they could trawl it. Shrimp love coral rubble. Bottom trawling within the OHAPC has been prohibited since first enacted in 1985. The main purpose of the HAPC was to protect the coral habitat and fishes from destructive bottom trawls. Why change course after 40 years? Unfortunately only a small portion of the reefs were originally protected in 1985. By the time the OHPAC was extended up to Cape Canaveral in 2000 extensive damage had been done. Separately attached is a peer-reviewed publication about the effects of trawling on the Oculina reefs. In parts of the reef up to 90% of the coral had been impacted by trawling by then. The coral provides habitat for dozens of species of fish including numerous species of grouper and snapper. The grouper use the reefs when adults for their spawning grounds. The juvenile fish end up in the grassbeds and mangroves of the Indian River lagoon where they live until maturing and moving offshore. Destroy the grassbeds, you destroy the fisheries. Destroy the coral habitat you destroy the grouper/snapper fisheries. Makes no sense for one shrimp fishery to flourish at the expense of the habitat and fin fish fisheries.</p> <p>During ROV dives conducted with NOAA Fisheries at the sites in the northern OHAPC (Reed and Farrington, 2011), the dominant fish observed included scamp (common), gag grouper, snowy grouper, red porgy (common), amberjack (abundant), black seabass (abundant), tilefish, red hogfish, tattler, cubbyu, blue angelfish, bank butterfly, morays, rough tongue bass, bigeye, scorpionfish, batfish, wrasses. Dominant invertebrates include Oculina varicosa coral (10-40 cm colonies), gorgonian corals, black coral (abundant), sponges, starfish, sea urchins, and mollusks. Unfortunately, the mounds appear to have been impacted by years of bottom shrimp trawling as documented within the Oculina HAPC. Many of these fish forage on the flats away from the reefs. If the shrimp trawling zone is opened inside the OHAPC and made closer to the reefs, it will make these fish more vulnerable to bycatch of the trawls. Per Dr. Grant Gilmore: "I personally documented the rock shrimp trawl fish by-catch by participating in collecting and preserving the fish caught in shrimp trawls during a multi-annual Florida Department of Natural Resources [now the Florida Fish and Wildlife Conservation Commission] study off Cape Canaveral conducted by Dr. Stewart Kennedy, 1973-1974. The trawl by-catch was substantial. Fishery impacts were primarily on seabass (Centropristis spp.), grunts, flatfishes, cuskeels and batfishes."</p> <p>I presented these data from these NOAA cruises to the SAFMC; and together with members of the Council including Roget Pugliese, Shrimp Advisory Panel, and Coral Advisory Panel present, the Council drew the new boundaries for the north extension that would protect all the coral habitat and Oculina coral ecosystem. In 2015 the SAFMC council passed the amendment to include the northern Oculina HAPC. We don't need more studies. We need the SAFMC to keep the protections in place that helps sustain the health and conservation of this unique ecosystem. The current eastern border of the OHAPC of Amendment 8 was purposely drawn along the 100 m contour line and varies from a minimum of 500 m to about 1000 m east from the high relief bathymetry. This is a quite reasonable buffer. Per the Coast Guard, straight borders, and wide buffer zones allows easier enforcement to keep potential poachers and errant trawls far from the reef habitat. And it reduces potential sedimentation from the trawls on the reefs.</p> <p>If passed, this Amendment will allow shrimp trawlers access to bottom trawl within the boundaries of a portion of the OHAPC. It will increase the degradation and proximal destruction of this unique-in-the world coral reef system. Adding in the already existing environmental stressors the coral reefs here (and around the world) and we could see the unintended expansion of degradation and destruction growing within the marine protected area. The purpose of marine protected areas like the OHAPC are to protect areas of essential habitat, fish populations and their spawning grounds. That is the whole purpose of establishing marine protected areas. It is not and should not allow special interests devalue MPAs of their purpose. If we destroy the habitat, we lose the fish; if we lose the fish, we lose the fisheries.</p> <p>The deep-water Oculina coral reefs are a unique coral reef ecosystem like no other on earth. These are truly a treasure that should be protected for perpetuity. Destructive fishing gear, specifically bottom trawls, should have no right to be used within the OHAPC. They have been banned for 40 years, there is no good data to suggest it is OK to allow it now. Opening a portion of the HAPC to trawling is a bad precedent. What would prevent the trawlers from requesting other portions of the OHAPC or the Deepwater CHAPC protected areas to be opened? Now is the time to protect these reefs, to allow the corals to recover, to allow the spawning aggregations of important grouper and snapper to recover. Now is not the time to diminish an area that is already protected.</p> <p>I am requesting that NOAA Fisheries and the South Atlantic Fishery Management Council deny Amendments 11 and 12. I ask you keep the current protections in place: "No person may use a bottom longline, bottom trawl, dredge, pot, or trap in the Oculina Bank Habitat Area of Particular Concern. If aboard a fishing vessel, no person may anchor, use an anchor and chain, or use a grapple and chain." Currently there are no shrimp fishery access areas within the Oculina Bank Habitat Area of Particular Concern, and now is not the time to reverse course, nor to redraw the boundaries of the protected area.</p> <p>John Reed          Research Professor Emeritus, Harbor Branch Oceanographic Institute, Florida Atlantic University          Johnkreed48@gmail.com          "</p>
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