Danny Fontaine; Dannyfontaine@comcast.net; Jacksonville, FL

As a recreational fisherman from Jacksonville fishing wrecks I am frustrated every time I go offshore. We have to fight through all of the Red Snapper every time we go. They are so thick we cannot actually get through them to catch fish we can keep. I know there is scientific data used to estimate the population and it may very well be correct, but all we know is we cannot catch anything but Red Snapper on the wrecks. I am not asking for a huge season. A few weekends a year is all I am asking for. Please open up Red Snapper fishing here in the South Atlantic Fishery. Place a size and catch limit. Thank You, Danny Fontaine

Greg Knight; gregkx1@aol.com; Brooklet, GA

I am just the peon recreational fisher/diver from Savannah Ga. I feel that have "NO RIGHTS LEFT" to fish OUR Federal waters and take Snapper/grouper or Cobia or any fish that is of value. Our rights are being stripped away from the recreational fisherman so that the commercial fisherman can profit from selling OUR resource. As a diver I can guarantee you that is no shortage of any of these species of fish in my area. So that management bullshit is over money not sustaining the fishery. I am for saving endangered species or limiting the catch but not by cutting out just the little guy (tax payer). I spend thousands of dollars to fish offshore every year on boat ,gear, bait ,gas and it is getting to the point that I can not keep a few fish to cook for my own family. It looks like the commercial fisherman are all making decisions for the SAFMC so I don't have much hope of getting any of my fishing rights back anytime soon. Thanks Recreational/outlaw fisherman

Chris McCaffity; freefish7@hotmail.com; Morehead City, NC

June 2017 SAFMC Meeting Public Comments The Visioning Project and Citizen Science Program provide wonderful opportunities for interested fishermen and fishery managers to work together on reducing regulatory discards and discard mortality while collecting better data. A good start could be creating an official tag and release program that rewards responsible fishermen who use descending devices when needed with the chance to keep some Red Snapper. Another step in the right direction would be for permit holders to work with the council on a comprehensive plan for managing commercial quotas to reduce regulatory discards while protecting spawning aggregations. Here are a few other things I would like the council to consider. Please think about marking the new SMZs with data buoys. This would make the closed areas easier to identify and avoid. Attached cameras could collect valuable data and prevent poaching. Please do not allow the creation of corporate fish farms in coastal waters since they have a terrible record of spreading disease, pollution, and parasites to surrounding ecosystems. A much better alternative would be to create artificial reef habitat and stock some species such as cobia. Hatcheries and habitat enhancement can be the perfect blend of openwater aquaculture and wild-caught seafood that lives free and self-sufficient until harvested. These proven solutions would benefit everyone by increasing seafood production and recreational opportunity in an environmentally friendly way. Please work with concerned citizens to ensure that any offshore energy exploration or extraction is done in ways that have as many positive benefits and few negative impacts as possible. We should come up with a list of mitigation options to submit according to NEPA guidelines. Thank you for your thoughtful consideration of these public comments. I am always happy to answer any questions or go into greater detail. Sincerely, Chris McCaffity

(Same Comment)

Jonathan French; french60wasp@gmail.com; Falls Church, VA Chad Brady; woody.brady@gmail.com; Lanexa, VA Larry Maggi; toy00cel@yahoo.com; Norfolk, VA Preston Andrews; pra87795@uga.edu; Savannah, GA Jason Buckley; jab3zc@hotmail.com; Williamsburg, VA Jon Worthington; ncpierrat@gmail.com; Camden, NC Jake Worthington; pelagicslayer@gmail.com; Camden, NC Lori Worthington; loriandjonw@yahoo.com; Kitty Hawk, NC Robert Critcher; critcher1307@gmail.com; Virginia Beach, VA Brian Olszyk; catchfishandchill@gmail.com; Norfolk, VA Ritchie Howell: btbldr@hotmail.com: Kitty Hawk, NC Shane Hatcher; s.hatcher25@cox.net; Virginia Beach, VA Josh Lambert, Durham, NC Greg Grotyohann; Southern Shores, NC Nathan Henry; Nathanhenry86@yahoo.com; Powhatan, VA Josh Saunders; jl.saunders@comcast.net; Farnham, VA Norman Greenleaf; 911lawncare@gmail.com; Lanexa, VA Dear Members of the South Atlantic Fisheries Management Council (SAFMC), Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: • A management zone ranging from Key West to New York • An Annual Catch Limit of 1.42 million pounds from Key West to New York Despite claims in the SAFMC Cobia Discussion Paper authored by SAFMC legal counsel, the following facts hold continue to be true: 1) The academic community continues to stand behind the hypothesis presented in by Adam Hrincevich (University of Southern Mississippi) and John R. Gold (Texas A&M) that cobia are genetically homogeneous. The University of Southern Mississippi tagging data provided "strong evidence of an annual spring migration from south Florida wintering grounds northward along both coasts of the Florida peninsula to springsummer feeding and spawning grounds in northern Gulf and U.S. south Atlantic waters, with a return migration to south Florida in late fall. Several cobia tagged off Mississippi were recaptured as far west as Texas, while others were recaptured as far away as South Carolina and Virginia. This evidence also refutes the assertion of cobia being genetically different in the Gulf versus the Atlantic. If Southern's Mississippi's research is credible, then the current management plan does not manage cobia through their full migration. Yet, while members of the council have acknowledged receipt of this peer-reviewed academic research, there has been no formal authored statement explaining why these conflicting viewpoints from the academic community are not deemed credible, yet SEDAR28's report, that has not driven any change within the academic communities stated knowledge on cobia life history and genetics, is deemed credible. a. *Hrincevich, A.W. 1993. Analysis of Cobia Rachycentron canadum population structure in the northern Gulf of Mexico using mitochondrial DNA. M.Sc. Thesis. University of Southern Mississippi, Hattiesburg, MS. 91pp. b. Population Genetic Comparisons among Cobia from the Northern Gulf of Mexico, U.S. Western Atlantic, and Southeast Asia John R. Gold a , Melissa M. Giresi a , Mark A. Renshaw a & Jin-Chywan Gwo b a Center for Biosystematics and Biodiversity, Texas A&M University, College Station, Texas, 77843-2258, USA b Department of Aquaculture, , Tiwan National Ocean University, Keelung, 20224, Taiwan Version of record first published: 10 Dec 2012. http://agrilifecdn.tamu.edu/gold/files/2012/05/Gold-et-al.-2013.pdf c. University of Southern Mississippi Tagging Program Cobia findings http://gcrl.usm.edu/public/fish/cobia.php 2) The use of

MRIP for cobia is demonstrated to generate huge variability and catch totals three sigma's outside of the standard deviation for the data. Any industry that uses data analysis to drive decision-making and data analysts will indicate that data points well outside the standard deviation represent problems with the data collection process. Industries will not make policy decisions based on those standards. For the week of July 8-14, MRIP surveyors reported 0 fish observed and measured and 3 fish reported dead for two intercepts. Somehow, MRIP extrapolated out those samples to indicate 14,524 fish caught. Using the MRIP average of 33 pounds per harvested fish, this means MRIP counted a week with zero fish observed as 479,292 of actual catch. This was more than half of Virginia's annual catch and over 37 percent of the South Atlantic catch of 1,291,556 pounds for the entire 2016 season. This obvious outlier was deemed good enough for management and is being used as justification for efforts to restrict Virginia's catch in 2017 and beyond. This data is almost triple the standard deviation for the weekly catch data totals in Virginia for 2016. The second highest catch week in Virginia was 3164 fish caught, totaling 104,412 pounds. That means the week of July 8-14 tracked as almost four and a half times a higher catch than any other week of the Virginia season. The Emergency Action is appropriate for the following reasons: 1) The variability of MRIP data, coupled with the use of genetics data that does not represent the conclusions of the academic community indicates that the management parameters and decision-making for cobia do not represent best science available and violate National Standard 2 of the Magnuson Stevens Act. 2) The resulting allocation following the split of management zones that have left 2.6 million pounds of quota of cobia to East Florida and the Gulf of Mexico while the South Atlantic states and Virginia are left to squabble over 620,000 pounds of quota. This is not a fair and equitable distribution of the resource, which is a violation of National Standard 4 of the Magnuson Stevens Act. Not to mention that the biomass, especially of the fish population showing in North Carolina and Virginia, is the largest and healthiest observed by local fishermen in over a decade. 3) The devastating economic loss caused by these unjustified actions is a violation of National Standard 8 of the Magnuson Stevens Act. For these reasons, I recommend the following actions by the Council: 1) Vote in favor of the emergency action, returning the Annual Catch Limit for the South Atlantic to 1.42 million pounds and the management boundaries to Key West-New York until the completion of a stock assessment that features a. Consideration of the academic work presented by Texas A&M and Southern Mississippi tagging data b. Review of mandatory reporting data currently being collected in Virginia. c. More study of the large body of cobia that winters offshore of the North Carolina capes, and more sampling from North Carolina and Virginia where the population and catch rates appear to be the highest. d. Equal representation by Virginia and North Carolina stakeholders. 2) Subject MRIP data collection conclusions on cobia to the National Academy of Sciences for review. 3) Author a recommendation requesting that ASMFC management of cobia should not start until a new stock assessment is completed. Thank You Jonathan French

Shannon Bradford; shannonwb68@aol.com; Cocoa, FL

I think that limiting the permits and restricting fishing for an elite few is terribly wrong taking away from the local anglers, local guides, and local economy's. Restricting the red snapper fishing in the Atlantic off of Florida is way off balance as well because everyone I talked to goes out and continues to catch some amazing giant red snapper in mass quantities and cannot keep them off the line long enough to get your bait past them to catch other fish and the survival rate of released fish is very slim because the sharks eat them right away or they are not properly having their swim bladder vented. Local resource experts, FWC, and local angler groups should be in charge of fishing regulation and conservation not the government and the elite rich corporate entities.

James Hull; hullsseafood@aol.com; Ormond Beach, FL

The Grey trigger size limit of 14 inches must be changed back to 12 inches. This was a mistake in increasing this size limit based on no biological reasoning. The increase has caused an large increase in dead discards and loss of access to the fishery for consumers. The recreational sectors must be made accountable thru federal permits and reporting just as the commercial and for hire are. Thank you Jimmy hull

Alfred Alson; alfred@thealsons.com; Palm Coast, FL

I am opposed to for-hire limited entry. These changes do not increase sustainability of fish species. Decreasing the number of for-hire fishing boats creates a monopoly for the remaining boats. This will result in increased prices to the public and fewer people able to go fishing. Fishing is a major component of visits to Florida. Such a change could have a major effect on jobs and state revenues.

(Same comment)

Bill Gorham; Southern Shores, NC

TJ Cheek; Brunswick, GA

I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: • A management zone ranging from Key West to New York • Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. The Emergency Action discussion paper response: The result of SEDAR 28 was that cobia were not overfished or undergoing overfishing, the current overfishing is due to the regulatory decision and oversight that moved management zone location, allocations, in part ask an agreed "want" to lower catch. That decision is the action we are asking be corrected for multiple reasons that clearly fall within the guidelines of an Emergency Action. More cobia are not being harvested out of US water today than in years past, the catch has merely shifted. 1) Since 2011 Virginia has become a major stakeholder state in the cobia fishery, yet they had no voting power or direct representation during the regulatory process that seemly dates back to 2009. During discussions on lowering the catch for cobia starting in 2009 per the sign in sheets from those council meetings there were no Mid-Atlantic representatives present. The growth of Virginia cobia fishery, VMRC data collection methods, Texas A&M genetic research, and current studies underway are all new information that cannot be ignored. The effects of Amendment 20B and resulting regulations/allocations has created circumstances clearly unforeseen. 2) Per the definition 622.2 "Migratory group, for king mackerel, Spanish mackerel, and cobia means a group of fish that may or may not be a separate genetic stock, but that is treated as a separate stock for management purposes...." Per meeting minutes in 2009 it is clear a 50% reduction in catch was sought after as a need or want in a particular state. - Per SEDAR28 the current Migratory group boundary was not founded in science as many public information documents/presentations suggest, rather the location, (the FLA/GA boarder) was picked as a result of a suggestion for each of management from a members of the life history work shop. The scientist claimed there was no life history to refute this location nor did it support such a location. Note, VIMS tagging program was not used in this workshop. 3) It is clear that the management decisions/boundaries that resulted in more than a 50% reduction in total ACL poundage for the states GA-NY, was never subject to public notice or public comment. - The public comment for Amendment 20B was on how the ACL would be factored, not where boundary locations would be set, or reduction "wants". - There was no public comment held in what is one of the largest stakeholder states (Virginia) instead it was held in Delaware. Regardless of public comment of the compliance, it is totally improper

for public comment meetings for regulations related to cobia to not be held in one of the largest stakeholder states. It is however, further evidence of the oversight of the VA fishery. 4) In 2016 SC, NC, and VA all adopted the most restrictive regulations in history, yet MRIP's estimates still came back higher than all projected models. a. After the 2015 overages, request for Emergency Action were requested, the council with stakeholders worked to set regulations at the federal level that everyone felt would kept catch within or around the extremely small ACL. b. Given MRIPs spikes it has created this new circumstance in that it has become clear that without an Emergency Action there is no regulatory action outside of closures and or extremely restrictive seasons that could result in keeping the catch within the current ACL. 5) There has not been two consecutive years of early closures that equally affect each state as last year GA and SC peak seasons were not harmed by the June 20th closure. 6) ASMFC involvement is not a corrective action. "Expected Harm or Disruption to Fishery or Community" It is unclear why it is being suggested that a community must first suffer the economic hardship prior to action being taken, the harm and disruption to the fishery and community has been disclosed by stakeholders at almost every meeting since 2016. As for EFLA and the potential for hardships due to overages, that has been acknowledge however that doesn't change the pertinent information and or situation as a whole. Science supported a zone much further south into EFLA, science supports that cobia tagged in GA, SC, NC, VA have been recaptured along the EFLA or Gulf. If science holds true, the next stock assessment results could move the boundaries, and parts of EFLA could be under a rebuilding plan. 7) The variability of MRIP data, coupled with the use of genetics data that does not represent the conclusions of the academic community indicates that the management parameters and decisionmaking for cobia do not represent best science available and violate National Standard 2 of the Magnuson Stevens Act. 8) The resulting allocation following the split of management zones that have left 2.6 million pounds of guota of cobia to East Florida and the Gulf of Mexico while the South Atlantic states and Virginia are left to squabble over 680,000 pounds of quota. This is not a fair and equitable distribution of the resource, which is a violation of National Standard 4 of the Magnuson Stevens Act. Not to mention that the biomass, especially of the fish population showing in North Carolina and Virginia, is the largest and healthiest observed by local fishermen in over a decade. To claim reverting back to Amendment 18's boundary and or ACL of 1.42Mil does nothing is simply false. It would take us from 200% over the ACL to less than 20% and that is even with the addition EFLA catch.

Richard Baturin; <u>richardbaturin@gmail.com</u>; Charleston, SC I am opposed to for-hire limited entry.

Donald Olivie; cecile3rd@aol.com; Bluffton, SC

I have been using charter boats for many years a in the last few years and I have noticed the reduced number of boats available in the last few years. The restrictions are making it hard for Charter Captains to make a living and it is not fare to the citizens who enjoy this sport and would like to accasionally bring some fresh fish home for dinner

Eric Bregman; ericbregman1@gmail.com; Greensboro, NC

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. Despite claims in the SAFMC Cobia Discussion Paper authored by legal counsel, the following facts still remain to be true: The academic community continues to stand behind the hypothesis presented in by Adam Hrincevich (University of Southern Mississippi) and John R. Gold (Texas A&M) that cobia are genetically homogeneous. The University of Southern Mississippi tagging data provided "strong evidence of an annual spring migration from south Florida wintering grounds northward along both coasts of the Florida peninsula to spring-summer feeding and spawning grounds in northern Gulf and U.S. south Atlantic waters, with a return migration to south Florida in late fall. Several cobia tagged off Mississippi were recaptured as far west as Texas, while others were recaptured as far away as South Carolina and Virginia. This evidence also refutes the assertion of cobia being genetically different in the Gulf versus the Atlantic. If Southern's Mississippi's research is credible, then the current management plan does not manage cobia through their entire migratory range. In fact, the current management boundary ignores science and sets a boundary based on "management purposes", yet that management decision (location of the zone split) was not subject to a public comment period. The use of MRIP for cobia is demonstrated to generate huge variability and catch totals three sigma's outside of the standard deviation for the data. NMFS has been made fully aware of these extreme spikes in MRIP's catch estimates for cobia, were in one week zero observed fish but three reported, resulted in over 450,000 pounds of fish harvested in that one week. With NMFS seemly unwilling to use smoothing methods and or models for cobia, like those used for black seabass in the North East, it has created a situation that will result in great loss of access, economic hardship, and regulatory crisis. The result of SEDAR 28 was that cobia were not overfished or undergoing overfishing, the current overfishing is due to the regulatory decision and oversight that moved management zone location, allocations, in part ask an agreed "want" to lower catch. That decision is the action we are asking be corrected for multiple reasons that clearly fall within the guidelines of an Emergency Action. More cobia are not being harvested out of US water today than in years past, the catch has merely shifted. Since 2011 Virginia has become a major stakeholder state in the cobia fishery, yet they had no voting power or direct representation during the regulatory process that seemly dates back to 2009. During discussions on lowering the catch for cobia starting in 2009 per the sign in sheets from those council meetings there were no Mid-Atlantic representatives present. The growth of Virginia cobia fishery, VMRC data collection methods, Texas A&M genetic research, and current studies underway are all new information that cannot be ignored. The effects of Amendment 20B and resulting regulations/allocations has created circumstances clearly unforeseen. Per the definition 622.2 "Mirgratory group, for king mackerel, Spanish mackerel, and cobia means a group of fish that may or may not be a separate genetic stock, but that is treated as a separate stock for management purposes...." Per meeting minutes in 2009 it is clear a 50% reduction in catch was sought after as a need or want in a particular state. Per SEDAR28 the current Migratory group boundary was not founded in science as many public information documents/presentations suggest, rather the location, (the FLA/GA boarder) was picked as a result of a suggestion for each of management from a members of the life history work shop. The scientist claimed there was no life history to refute this location nor did it support such a location. Note, VIMS tagging program was not used in this workshop. It is clear that the management decisions/boundaries that resulted in more than a 50% reduction in total ACL poundage for the states GA-NY, was never subject to

public notice or public comment. The public comment for Amendment 20B was on how the ACL would be factored, not where boundary locations would be set, or reduction "wants". There was no public comment held in what is one of the largest stakeholder states (Virginia) instead it was held in Delaware. Regardless of public comment of the compliance, it is totally improper for public comment meetings for regulations related to cobia to not be held in one of the largest stakeholder states. It is however, further evidence of the oversight of the VA fishery. In 2016 SC, NC, and VA all adopted the most restrictive regulations in history, yet MRIP's estimates still came back higher than all projected models. After the 2015 overages, request for Emergency Action were requested, the council with stakeholders worked to set regulations at the federal level that everyone felt would kept catch within or around the extremely small ACL. Given this new circumstance it has become clear that without an Emergency Action there is no regulatory action outside of closures and or extremely restrictive seasons that can "fit" us into the current ACL. There has not been two consecutive years of early closures that equally affect each state as last year GA and SC peak seasons were not harmed by the June 20th closure. ASMFC involvement is not a corrective action. Expected Harm or Disruption to Fishery or Community It is unclear why it is being suggested that a community must first suffer the economic hardship prior to action being taken, the harm and disruption to the fishery and community has been disclosed by stakeholders at almost every meeting since 2016. As for EFLA and the potential for hardships due to overages, that has been acknowledge however that doesn't change the pertinent information and or situation as a whole. Science supported a zone much further south into EFLA, science supports that cobia tagged in GA, SC, NC, VA have been recaptured along the EFLA or Gulf. If science holds true, the next stock assessment results could move the boundaries, and parts of EFLA could be under a rebuilding plan. The variability of MRIP data, coupled with the use of genetics data that does not represent the conclusions of the academic community indicates that the management parameters and decision-making for cobia do not represent best science available and violate National Standard 2 of the Magnuson Stevens Act. The resulting allocation following the split of management zones that have left 2.6 million pounds of quota of cobia to East Florida and the Gulf of Mexico while the South Atlantic states and Virginia are left to squabble over 680,000 pounds of quota. This is not a fair and equitable distribution of the resource, which is a violation of National Standard 4 of the Magnuson Stevens Act. Not to mention that the biomass, especially of the fish population showing in North Carolina and Virginia, is the largest and healthiest observed by local fishermen in over a decade. The devastating economic loss caused by these unjustified actions is a violation of National Standard 8 of the Magnuson Stevens Act. For these reasons, I recommend the following actions by the Council: Vote in favor of the emergency action, returning the Annual Catch Limit for the entire South Atlantic management are for cobia to 1.42 million pounds and the management boundaries to Key West-New York until the completion of a stock assessment. Request NMFS use smoothing methods/models to correct spikes in catch estimates for the past two years and beyond if needed. Author a recommendation requesting that ASMFC management of cobia should not start until a new stock assessment is completed or an Emergency Action is in place. States along the entire migratory route of "offshore" cobia, to which the SAFMC has jurisdiction from 3-200 miles, by law FMPs are required to have fair and equitable access and allocation. Fair and equitable should not be something that is subject to "datasets" that ignore science and material facts in order to manipulate what is fair or what is equitable. There is no regulatory action the council can to take that would result in anything that resembles fair and equitable access under the current ACL and issues with MRIP estimates. I believe an emergency action option was written into law not only to close fisheries but to also provide an avenue for the corrective action to situations just like we are facing here with cobia. Thank You,

Cory Ransone; Folly Beach, SC

I am opposed to for-hire limited entry! Last December, there were 169 written comments against the proposal and just 3 for it, yet SAFMC members are still pushing it! This is a clear demonstration of members trying to support their best interests!!! No, No and No!.

Chris Bacon; chrisbacon@bellshouth.net; Tybee Island, GA

i am against the for hire limited entry, and against the commercialization of the public property of our fisheries

Ralph Brown; rbrown43@bellsouth.net; Jacksonville Beach; FL

I am a recreational fisherman with my own boat. Yet I fully support the existence of the "for hire fishing charter" industry. These captains offer an opportunity for non boat owners to experience the fun and enjoyment of recreational fishing. They, along with the entire recreational fishing ecosystem of boat manufacturers, marinas, tackle companies, bait shops, etc represent a very large economic segment of our economy. There should be no administrative action that would preclude any new charter captain from starting a business. To artificially limit new entrants from starting an enterprise would be against every foundational liberty we hold dear. I can't imagine that appointed officials would be in a position to decide who wins and who loses. That should be determined by a natural selection process won by the captains/guides that provide the best product not by an administrative decision based on quotas.

James Clark; eatfish@hookandlarder.com; Pittsboro, NC

I strongly oppose the idea of limiting for hire and charter boats fishing the Snapper Grouper complex. This is nonsense and I feel that your data on making a decision now is outdated.

Rick Baumann; rick@murrellsinletseafood.net; Murrells Inlet, SC

Guys - You really need to stop trying to move towards catch shares - which is all this limited entry for hire burlesque is about. It is time you realize that catch shares are not going to happen in any shape, manner or form. Don't embarrass yourselves by trying to push this through.

Nick Watson; <u>ngwatson@windstream.net</u>; Lexington, SC I oppose to for-hire limited entry

John Sconyers; acesupfishing@gmail.com; Murrells Inlet, SC

This is ridiculous... this is just another attempt to get a catch share program started. Didn't we just come out in huge number is deny this? It seems like the SAFMC is doing everything they can to make it impossible to do business..... the cobia closure is killing me my regular clients are going to NC so they can keep cobia.. you people are killing my business...

Zachery Hoffman; Seaford, VA

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for Cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. This fishery is absolutely critical to the livelihood of me and my family. At 26 years of age I've invested my whole life savings into my charter business (Salt Treated Fishing) I have two boats another captain and about 150k invested. The Cobia fishing makes up about 90% of my business so without it my livelihood would be in super jeopardy. For the last two years since this Cobia discussion started its already effected my business dramatically. I have clients from around the world that come and spend weeks here in Virginia to Cobia fish so not only is this fishery vital to me but also to our local economy. So please I ask with all my heart take Emergency Action! Thanks for your time have a great day. Capt Zachery Hoffman 757-817-1388 www.salttreatedfishing.com

Fred Worthington; seadonkeysportfishing@gmail.com; Kitty Hawk, NC

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. Despite claims in the SAFMC Cobia Discussion Paper authored by legal counsel, the following facts still remain to be true: The academic community continues to stand behind the hypothesis presented in by Adam Hrincevich (University of Southern Mississippi) and John R. Gold (Texas A&M) that cobia are genetically homogeneous. The University of Southern Mississippi tagging data provided "strong evidence of an annual spring migration from south Florida wintering grounds northward along both coasts of the Florida peninsula to spring-summer feeding and spawning grounds in northern Gulf and U.S. south Atlantic waters, with a return migration to south Florida in late fall. Several cobia tagged off Mississippi were recaptured as far west as Texas, while others were recaptured as far away as South Carolina and Virginia. This evidence also refutes the assertion of cobia being genetically different in the Gulf versus the Atlantic. If Southern's Mississippi's research is credible, then the current management plan does not manage cobia through their entire migratory range. In fact, the current management boundary ignores science and sets a boundary based on "management purposes", yet that management decision (location of the zone split) was not subject to a public comment period. *Hrincevich, A.W. 1993. Analysis of Cobia Rachycentron canadum population structure in the northern Gulf of Mexico using mitochondrial DNA. M.Sc. Thesis. University of Southern Mississippi, Hattiesburg, MS. 91pp. Population Genetic Comparisons among Cobia from the Northern Gulf of Mexico, U.S. Western Atlantic, and Southeast Asia John R. Gold a , Melissa M. Giresi a , Mark A. Renshaw a & Jin-Chywan Gwo b a Center for Biosystematics and Biodiversity, Texas A&M University, College Station, Texas, 77843-2258, USA b Department of Aquaculture, , Tiwan National Ocean University, Keelung, 20224, Taiwan Version of record first published: 10 Dec 2012.

http://agrilifecdn.tamu.edu/.../.../2012/05/Gold-et-al.-2013.pdf University of Southern Mississippi Tagging Program Cobia findings http://gcrl.usm.edu/public/fish/cobia.php The use of MRIP for cobia is demonstrated to generate huge variability and catch totals three sigma's outside of the standard

deviation for the data. NMFS has been made fully aware of these extreme spikes in MRIP's catch estimates for cobia, were in one week zero observed fish but three reported, resulted in over 450,000 pounds of fish harvested in that one week. With NMFS seemly unwilling to use smoothing methods and or models for cobia, like those used for black seabass in the North East, it has created a situation that will result in great loss of access, economic hardship, and regulatory crisis. The Emergency Action discussion paper response: The result of SEDAR 28 was that cobia were not overfished or undergoing overfishing, the current overfishing is due to the regulatory decision and oversight that moved management zone location, allocations, in part ask an agreed "want" to lower catch. That decision is the action we are asking be corrected for multiple reasons that clearly fall within the guidelines of an Emergency Action. More cobia are not being harvested out of US water today than in years past, the catch has merely shifted. Since 2011 Virginia has become a major stakeholder state in the cobia fishery, yet they had no voting power or direct representation during the regulatory process that seemly dates back to 2009. During discussions on lowering the catch for cobia starting in 2009 per the sign in sheets from those council meetings there were no Mid-Atlantic representatives present. The growth of Virginia cobia fishery, VMRC data collection methods, Texas A&M genetic research, and current studies underway are all new information that cannot be ignored. The effects of Amendment 20B and resulting regulations/allocations has created circumstances clearly unforeseen. Per the definition 622.2 "Mirgratory group, for king mackerel, Spanish mackerel, and cobia means a group of fish that may or may not be a separate genetic stock, but that is treated as a separate stock for management purposes...." Per meeting minutes in 2009 it is clear a 50% reduction in catch was sought after as a need or want in a particular state. Per SEDAR28 the current Migratory group boundary was not founded in science as many public information documents/presentations suggest, rather the location, (the FLA/GA boarder) was picked as a result of a suggestion for each of management from a members of the life history work shop. The scientist claimed there was no life history to refute this location nor did it support such a location. Note, VIMS tagging program was not used in this workshop. It is clear that the management decisions/boundaries that resulted in more than a 50% reduction in total ACL poundage for the states GA-NY, was never subject to public notice or public comment. The public comment for Amendment 20B was on how the ACL would be factored, not where boundary locations would be set, or reduction "wants". There was no public comment held in what is one of the largest stakeholder states (Virginia) instead it was held in Delaware. Regardless of public comment of the compliance, it is totally improper for public comment meetings for regulations related to cobia to not be held in one of the largest stakeholder states. It is however, further evidence of the oversight of the VA fishery. In 2016 SC, NC, and VA all adopted the most restrictive regulations in history, yet MRIP's estimates still came back higher than all projected models. After the 2015 overages, request for Emergency Action were requested, the council with stakeholders worked to set regulations at the federal level that everyone felt would kept catch within or around the extremely small ACL. Given this new circumstance it has become clear that without an Emergency Action there is no regulatory action outside of closures and or extremely restrictive seasons that can "fit" us into the current ACL. There has not been two consecutive years of early closures that equally affect each state as last year GA and SC peak seasons were not harmed by the June 20th closure. ASMFC involvement is not a corrective action. Expected Harm or Disruption to Fishery or Community It is unclear why it is being suggested that a community must first suffer the economic hardship prior to action being taken, the harm and disruption to the fishery and community has been disclosed by stakeholders at almost every meeting since 2016. As for EFLA and the potential for hardships due to overages, that has been acknowledge however that doesn't change the pertinent information and or situation as a whole. Science supported a zone much further south into EFLA, science supports that cobia tagged in GA, SC, NC, VA have been recaptured along the EFLA or Gulf. If science holds true, the next stock assessment results could move the boundaries, and parts of EFLA could be under a rebuilding plan. The variability of MRIP data, coupled with the use of genetics data

that does not represent the conclusions of the academic community indicates that the management parameters and decision-making for cobia do not represent best science available and violate National Standard 2 of the Magnuson Stevens Act. The resulting allocation following the split of management zones that have left 2.6 million pounds of quota of cobia to East Florida and the Gulf of Mexico while the South Atlantic states and Virginia are left to squabble over 680,000 pounds of quota. This is not a fair and equitable distribution of the resource, which is a violation of National Standard 4 of the Magnuson Stevens Act. Not to mention that the biomass, especially of the fish population showing in North Carolina and Virginia, is the largest and healthiest observed by local fishermen in over a decade. The devastating economic loss caused by these unjustified actions is a violation of National Standard 8 of the Magnuson Stevens Act. For these reasons, I recommend the following actions by the Council: Vote in favor of the emergency action, returning the Annual Catch Limit for the entire South Atlantic management are for cobia to 1.42 million pounds and the management boundaries to Key West-New York until the completion of a stock assessment. Request NMFS use smoothing methods/models to correct spikes in catch estimates for the past two years and beyond if needed. Author a recommendation requesting that ASMFC management of cobia should not start until a new stock assessment is completed or an Emergency Action is in place. States along the entire migratory route of "offshore" cobia, to which the SAFMC has jurisdiction from 3-200 miles, by law FMPs are required to have fair and equitable access and allocation. Fair and equitable should not be something that is subject to "datasets" that ignore science and material facts in order to manipulate what is fair or what is equitable. There is no regulatory action the council can to take that would result in anything that resembles fair and equitable access under the current ACL and issues with MRIP estimates. I believe an emergency action option was written into law not only to close fisheries but to also provide an avenue for the corrective action to situations just like we are facing here with cobia. Thank You, Fred

Jeffrey Mazuco; mazucojeff@gmail.com; Myrtle Beach, SC

Fish a lot snapper on every drop at spots catching bigger ones they're not making it back to the bottom Handled correctly properly vented they're not making it like to see some other plan on the snapper. As far as the charter and head boat fishing limitations have we not took enough away from people in this country these folks doing what they love and you're going to try and put him out of business that's ridiculous outta be a ashamed of yourself

Jason Fowler; ericunc95@gmail.com; Sneeds Ferry, NC

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. Despite claims in the SAFMC Cobia Discussion Paper authored by legal counsel, the following facts still remain to be true: The academic community continues to stand behind the hypothesis presented in by Adam Hrincevich (University of Southern Mississippi) and John R. Gold (Texas A&M) that cobia are genetically homogeneous. The University of Southern Mississippi tagging data provided "strong evidence of an annual spring migration from south Florida wintering grounds northward along both coasts of the Florida peninsula to spring-summer feeding and spawning grounds in northern Gulf and U.S. south Atlantic waters, with a return migration to south Florida in late fall. Several cobia tagged off Mississippi were recaptured as far west as Texas, while others were recaptured

as far away as South Carolina and Virginia. This evidence also refutes the assertion of cobia being genetically different in the Gulf versus the Atlantic. If Southern's Mississippi's research is credible, then the current management plan does not manage cobia through their entire migratory range. In fact, the current management boundary ignores science and sets a boundary based on "management purposes", yet that management decision (location of the zone split) was not subject to a public comment period. The use of MRIP for cobia is demonstrated to generate huge variability and catch totals three sigma's outside of the standard deviation for the data. NMFS has been made fully aware of these extreme spikes in MRIP's catch estimates for cobia, were in one week zero observed fish but three reported, resulted in over 450,000 pounds of fish harvested in that one week. With NMFS seemly unwilling to use smoothing methods and or models for cobia, like those used for black seabass in the North East, it has created a situation that will result in great loss of access, economic hardship, and regulatory crisis. The result of SEDAR 28 was that cobia were not overfished or undergoing overfishing, the current overfishing is due to the regulatory decision and oversight that moved management zone location, allocations, in part ask an agreed "want" to lower catch. That decision is the action we are asking be corrected for multiple reasons that clearly fall within the guidelines of an Emergency Action. More cobia are not being harvested out of US water today than in years past, the catch has merely shifted. Since 2011 Virginia has become a major stakeholder state in the cobia fishery, yet they had no voting power or direct representation during the regulatory process that seemly dates back to 2009. During discussions on lowering the catch for cobia starting in 2009 per the sign in sheets from those council meetings there were no Mid-Atlantic representatives present. The growth of Virginia cobia fishery, VMRC data collection methods, Texas A&M genetic research, and current studies underway are all new information that cannot be ignored. The effects of Amendment 20B and resulting regulations/allocations has created circumstances clearly unforeseen. Per the definition 622.2 "Mirgratory group, for king mackerel, Spanish mackerel, and cobia means a group of fish that may or may not be a separate genetic stock, but that is treated as a separate stock for management purposes...." Per meeting minutes in 2009 it is clear a 50% reduction in catch was sought after as a need or want in a particular state. Per SEDAR28 the current Migratory group boundary was not founded in science as many public information documents/presentations suggest, rather the location, (the FLA/GA boarder) was picked as a result of a suggestion for each of management from a members of the life history work shop. The scientist claimed there was no life history to refute this location nor did it support such a location. Note, VIMS tagging program was not used in this workshop. It is clear that the management decisions/boundaries that resulted in more than a 50% reduction in total ACL poundage for the states GA-NY, was never subject to public notice or public comment. The public comment for Amendment 20B was on how the ACL would be factored, not where boundary locations would be set, or reduction "wants". There was no public comment held in what is one of the largest stakeholder states (Virginia) instead it was held in Delaware. Regardless of public comment of the compliance, it is totally improper for public comment meetings for regulations related to cobia to not be held in one of the largest stakeholder states. It is however, further evidence of the oversight of the VA fishery. In 2016 SC, NC, and VA all adopted the most restrictive regulations in history, yet MRIP's estimates still came back higher than all projected models. After the 2015 overages, request for Emergency Action were requested, the council with stakeholders worked to set regulations at the federal level that everyone felt would kept catch within or around the extremely small ACL. Given this new circumstance it has become clear that without an Emergency Action there is no regulatory action outside of closures and or extremely restrictive seasons that can "fit" us into the current ACL. There has not been two consecutive years of early closures that equally affect each state as last year GA and SC peak seasons were not harmed by the June 20th closure. ASMFC involvement is not a corrective action. Expected Harm or Disruption to Fishery or Community It is unclear why it is being suggested that a community must first suffer the economic hardship prior to action being taken, the harm and disruption to the fishery and community has been disclosed by stakeholders at almost every

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Ron Bailey; ronbailey101@aol.com; Myrtle Beach, SC

With so many opposed how can you consider passing these partisan regulations? When did the few dictate to the masses?

Horace Hunter; hunter.bevan77@gmail.com; Conway, SC

I run a small charter business, but it keeps food on my family's table. I am strongly against limiting the number of snapper/ grouper permits.

Justin Witten; jwitten1@radford.edu; Murrells Inlet, SC

Please Leave the regulations the way hey are with the grouper and with being able to get the charter not headboat licenses. This is a way of life for a lot of our charter fishisherman down here in South Carolina. The cobia being closed in our state waters is also ridiculous because it is a migratory fish and every other state is allowed to keep and kill them. Even the commercial guys in SCare allowed to kill 3 per trip when they go out. I have customers every year that come down just to target cobia which do not now because we aren't allowed to keep them. Thanks for the loss of springtime business.

Jeff Maples; <u>t2grnguy@aol.com</u>; Myrtle Beach, SC

I strongly oppose Catch shares and limited access to a resource that is publicly owned.

Matt Cox; Oak Island, NC

The for-hire industry is an economic booster for us here on the NC coast. Millions and millions of dollars come to the communities near the coast, by visitors that just want to charter a fishing boat. Everyone benefits, including hotels, restaurants, tackle stores, grocery stores, gas stations, land owners, and lastly the local people. Trying to limit the for-hire industry will have a negative impact on the coastal communities, and it will also have a detrimental effect on the local economies. The for-hire sector has seen tremendous decreases in trip numbers in the last 10 years (at least 40% reduction). So what is the logical reason to try and limit for-hire trips further? Please do the smart thing and quit letting the environment groups push there agenda at the SAFMC, and listen to the people you are suppose to be representing. We all have a right to the great natural resources of our oceans, not just a select few. Thank You

Tom Swatzel; tom@sustainablefishing.org; Murrells Inlet; SC

The Council for Sustainable Fishing has attached a letter opposing for-hire limited entry in the snappergrouper fishery.

Howard Crumpler; Hampstead, NC

I write to you today to ask you support the adoption of the Emergency Action retuning the management parameters for Cobia in the Atlantic to those adopted in Amendment 18 until the completion of the new stock assessment and they selected a scientific credibility measurement tool for determining annual catch. Those parameters include. a) management zone ranging from key west to New York. b) Use the ABC control rule established in admendent 18 for or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models or methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages.

Barry Sowers; Lexington, SC

I am submitting this comment to inform you of my opposition to the "for-hire limited entry" proposal. I don't understand your desire for this proposal given there has been a plunge in for-hire fishing effort, no growth in for-hire permits and overwhelming opposition from fishermen. It would be one thing if for-hire limited entry was about fishery sustainability, but it's not. I dare not guess what your motivations or agendas are with this proposal but given you persistence in the face of massive opposition, I can't help but think it's financial in nature. I assure you my opinion and view on this topic is not alone and our opposition will resonate loudly.

Carl Griffin; deer.season@aol.com; Charleston, SC

The proposal to require limited entry in the head boat and charter is very much against the rights of those that fish. The charter/head boat industry provides an avenue for those that do not own boats to enjoy fishing. The limited entry proposal will soon become the same disaster that it is in the Gulf. The transfer of a license will become very costly and the costs will be passed along to the end users - increasing charter fees. This also will likely lead the council to push catch shares onto the charter industry.. At present, we have restricted the resource to the point that there are vast areas of ocean that are closed, un reasonable species closures , and very un reasonable catch limits. This proposal should be dismissed without discussion

Tom Addley; tom.addley@gmail.com; Chesnee, SC

The Council needs to understand that they are messing with our right to fish. This proposal will have very far reaching negative effects. The transfer of a charter ticket will go through the roof, then the cost to fish from a charter boat will rise out of reach for the average tourist. I cant see any good effects of this proposal. And on a side note. It is a shame that we are catching all of these Red Snapper off the coast of SC and killing these guys.. I vent and release and keep my fingers crossed but I know the chances of the fish after that. My two sons now 16 and 20 will most likely never get to experience this fishery as recreational..

Gil Gutierrez; gillucky27@aol.com; Davie, FL Opposed to for hire limited entry.

Shelia Godby; captsegull@suddenlink.net; New Bern, NC

WE CANNOT SUSTAIN FOR HIRE LIMITED ENTRY TO OUR FISHERIES. Since 2008, the Obama years, I LOST 75% of my business, sport fishing charts....all from regulations. That is dealers OUT OF BUSINESS. This year, since Trump is in, we are starting to look up. PLEASE, no more regulations.

Joe Burchfield; St. Augustine, FL

I am opposed to for hire limited entry. We are getting frustrated with the over regulation of our fishing resources.

Guy Spear; guyspear@yahoo.com; St. Augustine, FL

With the steady decline in the number of trips run from 2007 to 2016 (and a decline of 2.4 percent in just 2015 and 2016) I can see no reason to implement any further restrictions on those of us that are charter/head boat owner/operators. If it was for the betterment of the fisheries I might agree. But, it isn't

Logan Barnes; <u>barnesld@gmail.com</u>; Murrells Inlet, SC I oppose making the For-Hire permit a limited entry market. Thank you, Logan Barnes

Tom Dibert; <u>tdibert@comcast.net</u>; St. Augustine, FL I am opposed to limiting recreational snapper and grouper limits.

John Brake; <u>robbiebrake21@gmail.com</u>; St. Augustine, FL Limited entry is strp one more Federal regulation no one needs. I am opposed to it unilaterally.

Scott Fawcett; fishscottyf@bellsouth.net; Jensen Beach, FL

As a second generation FI. Charter boat company owner, I am Extremely against limiting the number of charter and headboats in the snapper-grouper fishery. The restrictions and closures that have implemented upon us over the last 10 years are less than fair already and made based on poor data collections. Now, to hear that these permits are going to be issued to the highest bidder disgusts me. This has nothing to do with helping the fishery and everything to do with money. The lopsidedness in

rules and laws from commercial to recreational fishing is already a joke as the recreational fishing community doesn't have the pull the commercial group does. Please don't continue considering this ridiculously unfair amendment which punishes everyone except the few who can afford the permits and which turns our recreational fishing into a commercial enterprise. Thank you. Capt. Scott Fawcett

Paul Baran; jagfan2@yahoo.com; St. Augustine, FL

I am opposed of any regulations that exclude the recreational boater/fisherman.

Jamie Hoyman; jcthoyman@yahoo.com; St. Augustine, FL No limits on charter fishing for snapper/grouper.

Jeff Schmuker; schmuk365@gmail.com; Newport, NC

I want to register my opposition to any for-hire limited entry in future regulations of the snappergrouper fishery. We fishermen are regulated enough already and creating additional restrictions on the industry will compromise the ability of non-boat owners to enjoy the resource. Respectfully, Jeff Schmucker Very concerned citizen

Ryan Lambert; Durham, NC

I have been cobia fishing, mainly off of the beach and piers, on the Outer Banks of NC for many years now. If there's anything that I've noticed, the OBX fishery changes from year to year based on spring and early summer temperatures and more importantly, wind patterns. I, along with many others, participate in catch and release and fish raging programs. These programs have produced fish that were tagged in the middle of the east coast and recaptured in the Gulf. For y'all to say that there are two separate fish groups is absolutely absurd. That's isn't statistically or scientifically supported, unless someone has been paid to publish research that concludes such. On my last trip to the OBX two weeks ago, in one afternoon on a pier 1000' into the ocean, I personally saw more than 30 fish in the span of 4 hours. Many of these fish were less than 2 years old and many were schooled with a larger female fish. I'm not sure how the SAFMC has been sampling populations, but you're obviously using the wrong methods. We love this fishery and protect it way better ourselves than you could ever manage to by enacting useless and unjustified regulations.

Lawrence Gray; <a>lgobxbeachboy@aol.com; Kitty Hawk, NC

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages. I am a local business owner (that has been on the Outer Banks for 69 years) and have seen first-hand from my customers and personal experiences just how much sport fishing, especially for Cobia, can stimulate the local economy.

Matthew Gray; matt@mattgray.net; Kitty Hawk, NC

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages. Having grown up on the Outer Banks for the past 20 years, I have been lucky to be a part of sport and commercial fishing and am disappointed to see the proposed regulation in its current form. The aforementioned changes would do greatly to ameliorate the issues.

Mark Miller; mark@markimiller.com; Carolina Beach, NC

I am opposed to the for-hire limited entry for snapper and grouper that is being proposed.

Cane Faircloth; cainfaircloth@hotmail.com; Supply, ND I am against the council implementing limited entry in the charter/headboat category.

Charles Wilson, bajaburritossc@gmail.com; Charleston, SC

The reincarnation of the discussion to limit the for-hire fishing industry in the South Atlantic is very disheartening. Surprisingly, this is not to dissimilar from the continued reincarnation of the Catch Share discussion. The thousands of fisherman that make up the South Atlantic have consistently spoken AGAINST both of these issues! Why do they continue to make their way back to the table? The for-hire industry has naturally been in a declining trend. Why is there any need to limit possible new fisherman into this industry? This makes no sense. This discussion is a waste of limited SAFMC money and this money should be spent on building New Reefs instead of talking the same nonsense corruption based issues that you have already wasted much time and energy on. The stakeholders of the South Atlantic OPPOSE FOR-HIRE LIMITED ENTRY DO NOT SUPPORT THIS

Daniel Phail; <u>phaild@yahoo.com</u>; Simpsonville, SC I am opposed to for-hire limited entry.

Fred Sinclair; fsinclair55@aol.com; St. Augustine, FL

Opposed to for-hire limited entry, this would ruin local commercial fishery. Red snapper catch data and season need to be re-evaluated for the SE Atlantic fishery. In short it's a joke.

Rich Anderson; Emerald Isle, NC

I am writing in strong opposition to limiting the number of charter for hire vessels in the snapper grouper fishery! There are already such a low number of charter boats participating in this fishery that it is very difficult to find one to hire! There are only two head boats left in Morehead City and two in Carolina Beach. Four head boats and a handful of six pack charters for all of NC is already too limitid Stop trying to fix problems that don't exist and focus on fixing the garbage data you consume to create your draconian regulations

Robert Schrader; bob@hookemandhachem.com; Point Pleasant, NJ

To ALL of you people who hold power over us, who just enjoy fishing, The influence of the "Enviro/nazis" has totally squashed any hope of the average American ever enjoying him or herself, with their families forever more. You are the willing participants in the effort to totally eliminate fishing for millions of people, even though you claim to be helping future generations. Here in the Northeast stock of some fish have been totally restored and "OVERFISHING", is "NOT" occurring yet we are again being cut! This whole system is not only unjust but morally reprehensible, and you the decision makers ALL have nothing to lose. STOP THE NONSENSE! Sincerely, Robert A. Schrader Point Pleasant, NJ 732-330-7041

Joel Hair; doby2k2@aol.com; Moncks Corner, SC

I have been catching Red Snapper on a regular basis and releasing. I oppose and would like to have a limit of at least 1 to justify the gas used for the trip.

Mark Jeffers; gmjeffers@gmail.com; New Bern, NC

I oppose limiting the number of charter and headboats in the snapper-grouper fishery. I oppose catch shares in any form not matter what you call it.

Cory Wigg; Charlotte, NC I am opposed to for-hire limited entry

Roger Jackson; McClellanville, SC

I am opposed to the for-hire limited entry. This will hurts tourism and effect the general public from enjoying some of the wonders of nature at a affordable price. This essentially creates a "stock Market" for permits and quotas.

Wayne Mershone; kenyonseafood@sc.rr.com; Murrells Inlet, SC

As a Snapper\Grouper Advisory Panel member I'm sure you remember my strong opposition to for-hire limited entry in the snapper-grouper fishery at our last meeting and ask the South Atlantic Fishery Management Council to stop any further consideration of it. Looking to the future for my fellow commercial fishing captains and me, many of us are getting to the age that commercial fishing for days at sea may become too much for the body to handle. However, running charters would still allow us to make a living. If I had known this issue was going to be coming back up I would have had my for-hire permit already. A for-hire permit is another fishery permit to keep in our portfolio or toolbox of permits to be able to make a living as a full time snapper-grouper fisherman. There is no justification for limiting the number of charter and headboats because there has been a 40 percent plunge in for-hire permits this year than in 2009. The last time this issue came before the SAFMC in December there were 169 written comments against the proposal and just 3 for it. I'm sure fishery stakeholder opposition remains unwavering. I thought the SAFMC promised to listen to the stakeholders. Please listen to these stakeholders and stop this effort to impose for-hire limited entry. Thank you for your consideration. Respectfully, Wayne Mershon SAFMC Snapper\Grouper Advisory Panel Member

Jason DuBose; jdubose@oldfieldsc.com; Hilton Head, SC

I adamantly oppose any change of regulations and/or laws that would make any portion of the "For Hire" sector limited entry. There is currently no evidence that suggests that the "For Hire" sector is growing to the point that it negatively impacts the sustainability of any fishery. In fact the numbers show that the "For Hire" sector has decreased in size in regard to many permitted areas. Thank you, Capt. Jason DuBose Hilton Head, SC

Darrell Crabtree; <u>wefish111@yahoo.com</u>; Johns Island, SC I am opposed to for-hire limited entry: Stop playing politics with our fishery.

Troy Crane; <u>1973bertram@gmail.com</u>; Grandy, NC

We can really use everyone's support. Please copy and paste the below email and personalize it with your own information and additional thoughts. Post the comments here ASAP: https://safmc.wufoo.com/forms/qh32oi91u5utom/ START Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages.

M.L. Weedman; <u>x47weed@aol.com</u>; St. Augustine; FL No limit for recreational fishermen

James Ellis; Charleston, SC I oppose limited entry on for-hire fisherman!

Rick Stanley; rstanleyjr378@yahoo.com; Wilmington, NC

I am strictly against a limited entry plan for hire on the snapper grouper fishery. One day i hope to be able to participate in this fishery again as i did 10 years ago or have my children be able to. This is a public resource and i dont see any scientific proof that this will benefit the fishery. Also STOP pushing catch share / limited access on South Atlantic snapper/grouper fishery commercial or recreational. We dont want it. It already screwed up the Gulf Of Mexico fishermen

Adam Petnuch; afamjpetnuch@gmail.com; St. Augustine, FL

I am AGAINST the limited access to for hire permits. I am a young business owner, only 23 years old. I recently opened my own charter fishing business in Saint Augustine. 100% fully licensed and insured and legitamate. Now only 2 years into business I could be potentially robbed of my job because of this limited access. This is my full time career and I have no other source of income. THERE IS A SHORTAGE OF CHARTER FISHING CAPTAINS!!! We are all overbooked as it is currently. In only my 2nd year of business I am booked out atleast 6 months in advance.

Jeff Emery; jse360@aol.com; Daytona Beach, FL

Please decrease the size limit for triggerfish to 12 inches. I don't think it's fair that Florida federal waters is the only area where triggerfish have to be 14 inches and all other areas are 12 inches. The limit is 12 inches in state waters for Florida. Please make the limit 12 inches in federal waters offshore Florida. Thank you

Patrick Link; patricklink11@gmail.com; Williamsburg, VA

Dear SAFMC members, I am writing to you today in support of an emergency action to return the ACL to the orginal 1.42 millions pounds. To include EFL in the ACL once again. I have a few reasons below why this needs to be done. 1) Virginia did not have proper representation at the stock assessment particularly during the life history meeting of the stock assessment where this decision was made. As the largest stakeholder on the east coast it is against national standards to conduct meetings in this fashion. 2) New information has and is coming down the pipeline that refutes the non peer reviewed study used to make this zone split. Even even the zone split was warranted it should have been done considerably further south based on the comments from the stock assessment. There seems to have been no accounting for this when the ACL was broken up between GA-NY and EFL-Gulf. There was recommendation for an increase in ACL yet the GA-NY migratory group saw a decrease. 3) The use of MRIP data for a low encounter pulse fishery like Cobia is not an acceptable management tool. Every fisheries manager I have spoken with has stated on the record they do not believe the data to be accurate. This was further illustrated by were in one week in VA zero observed fish but three reported, resulted in over 450,000 pounds of fish harvested in that one week. With NMFS seemly unwilling to use smoothing methods and or models for cobia, like those used for black seabass in the North East, it has created a situation that will result in great loss of access, economic hardship, and regulatory crisis. 4) Also ASMFC should not be used as the scape goat for managing this fishery. The only tool states have been left with is non compliance when management is so absurd. Until A)Better data can be collected and B) a new stock assessment can be completed, I feel ASMFC involvement will do nothing more than allow a mechanism for the federal close to close another fishery utilizing inappropriate practices. In closing the 2017 cobia season has started here in VA and is already considered the best anyone has seen in decades. This is not an illusion of plenty there are plenty. Sometimes I wonder if we as humans like to make our importance on a species a little more important then it actually is? Is it possible that ocean warming trends have merely shifted migration patterns further north allowing for a better season for certain species in certain states while offering other opportunities to our friends to the north and south? I do know I have caught gag grouper in the Chesapeake bay 2 years in a row. I don't believe this is a normal occurrence. I beg you as fisheries mangers to spend some time on the water with people that do this and take what they say seriously. I can promise you the old waterman that has been doing this for decades has forgotten more about these species then you could read in a lifetime at your cubicle. Thank you for your time, Patrick Link

Steve Bennett; <u>srbennett74@gmail.com</u>; Crescent City, FL Im.opposed to for hire limited entry

Terry Plumblee; pierterry56@gmail.com; Rodanthe, NC

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I am an owner and manager of a fishing pier on Hatteras Island, NC. My livelihood depends on the recreational fishery. Cobia fishing is a significant part of that fishery and many fishermen fish the pier specifically to target cobia along with king mackerel and spanish mackerel. I question the catch data through the surveys as no surveys have been done on my pier when any large fish have been landed and only a handful of times in the last 5 years. I don't believe

that a thorough, if any, economic impact analysis has been performed on the changes in regulations regulations as required by federal law. Therefore,... I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. Despite claims in the SAFMC Cobia Discussion Paper authored by legal counsel, the following facts still remain to be true: The academic community continues to stand behind the hypothesis presented in by Adam Hrincevich (University of Southern Mississippi) and John R. Gold (Texas A&M) that cobia are genetically homogeneous. The University of Southern Mississippi tagging data provided "strong evidence of an annual spring migration from south Florida wintering grounds northward along both coasts of the Florida peninsula to spring-summer feeding and spawning grounds in northern Gulf and U.S. south Atlantic waters, with a return migration to south Florida in late fall. Several cobia tagged off Mississippi were recaptured as far west as Texas, while others were recaptured as far away as South Carolina and Virginia. This evidence also refutes the assertion of cobia being genetically different in the Gulf versus the Atlantic. If Southern's Mississippi's research is credible, then the current management plan does not manage cobia through their entire migratory range. In fact, the current management boundary ignores science and sets a boundary based on "management purposes", yet that management decision (location of the zone split) was not subject to a public comment period. *Hrincevich, A.W. 1993. Analysis of Cobia Rachycentron canadum population structure in the northern Gulf of Mexico using mitochondrial DNA. M.Sc. Thesis. University of Southern Mississippi, Hattiesburg, MS. 91pp. Population Genetic Comparisons among Cobia from the Northern Gulf of Mexico, U.S. Western Atlantic, and Southeast Asia John R. Gold a , Melissa M. Giresi a , Mark A. Renshaw a & Jin-Chywan Gwo b a Center for Biosystematics and Biodiversity, Texas A&M University, College Station, Texas, 77843-2258, USA b Department of Aquaculture, , Tiwan National Ocean University, Keelung, 20224, Taiwan Version of record first published: 10 Dec 2012.

http://agrilifecdn.tamu.edu/gold/files/2012/05/Gold-et-al.-2013.pdf University of Southern Mississippi Tagging Program Cobia findings http://gcrl.usm.edu/public/fish/cobia.php The use of MRIP for cobia is demonstrated to generate huge variability and catch totals three sigma's outside of the standard deviation for the data. NMFS has been made fully aware of these extreme spikes in MRIP's catch estimates for cobia, were in one week zero observed fish but three reported, resulted in over 450,000 pounds of fish harvested in that one week. With NMFS seemly unwilling to use smoothing methods and or models for cobia, like those used for black seabass in the North East, it has created a situation that will result in great loss of access, economic hardship, and regulatory crisis. The Emergency Action discussion paper response: The result of SEDAR 28 was that cobia were not overfished or undergoing overfishing, the current overfishing is due to the regulatory decision and oversight that moved management zone location, allocations, in part ask an agreed "want" to lower catch. That decision is the action we are asking be corrected for multiple reasons that clearly fall within the guidelines of an Emergency Action. More cobia are not being harvested out of US water today than in years past, the catch has merely shifted. Since 2011 Virginia has become a major stakeholder state in the cobia fishery, yet they had no voting power or direct representation during the regulatory process that seemly dates back to 2009. During discussions on lowering the catch for cobia starting in 2009 per the sign in sheets from those council meetings there were no Mid-Atlantic representatives present. The growth of Virginia cobia fishery, VMRC data collection methods, Texas A&M genetic research, and current studies underway are all new information that cannot be ignored. The effects of Amendment 20B and resulting regulations/allocations has created circumstances clearly unforeseen. Per the definition 622.2 "Mirgratory group, for king mackerel, Spanish mackerel, and cobia means a group of fish that may or

may not be a separate genetic stock, but that is treated as a separate stock for management purposes...." Per meeting minutes in 2009 it is clear a 50% reduction in catch was sought after as a need or want in a particular state. Per SEDAR28 the current Migratory group boundary was not founded in science as many public information documents/presentations suggest, rather the location, (the FLA/GA boarder) was picked as a result of a suggestion for each of management from a members of the life history work shop. The scientist claimed there was no life history to refute this location nor did it support such a location. Note, VIMS tagging program was not used in this workshop. It is clear that the management decisions/boundaries that resulted in more than a 50% reduction in total ACL poundage for the states GA-NY, was never subject to public notice or public comment. The public comment for Amendment 20B was on how the ACL would be factored, not where boundary locations would be set, or reduction "wants". There was no public comment held in what is one of the largest stakeholder states (Virginia) instead it was held in Delaware. Regardless of public comment of the compliance, it is totally improper for public comment meetings for regulations related to cobia to not be held in one of the largest stakeholder states. It is however, further evidence of the oversight of the VA fishery. In 2016 SC, NC, and VA all adopted the most restrictive regulations in history, yet MRIP's estimates still came back higher than all projected models. After the 2015 overages, request for Emergency Action were requested, the council with stakeholders worked to set regulations at the federal level that everyone felt would kept catch within or around the extremely small ACL. Given this new circumstance it has become clear that without an Emergency Action there is no regulatory action outside of closures and or extremely restrictive seasons that can "fit" us into the current ACL. There has not been two consecutive years of early closures that equally affect each state as last year GA and SC peak seasons were not harmed by the June 20th closure. ASMFC involvement is not a corrective action. Expected Harm or Disruption to Fishery or Community It is unclear why it is being suggested that a community must first suffer the economic hardship prior to action being taken, the harm and disruption to the fishery and community has been disclosed by stakeholders at almost every meeting since 2016. As for EFLA and the potential for hardships due to overages, that has been acknowledge however that doesn't change the pertinent information and or situation as a whole. Science supported a zone much further south into EFLA, science supports that cobia tagged in GA, SC, NC, VA have been recaptured along the EFLA or Gulf. If science holds true, the next stock assessment results could move the boundaries, and parts of EFLA could be under a rebuilding plan. The variability of MRIP data, coupled with the use of genetics data that does not represent the conclusions of the academic community indicates that the management parameters and decision-making for cobia do not represent best science available and violate National Standard 2 of the Magnuson Stevens Act. The resulting allocation following the split of management zones that have left 2.6 million pounds of quota of cobia to East Florida and the Gulf of Mexico while the South Atlantic states and Virginia are left to squabble over 680,000 pounds of quota. This is not a fair and equitable distribution of the resource, which is a violation of National Standard 4 of the Magnuson Stevens Act. Not to mention that the biomass, especially of the fish population showing in North Carolina and Virginia, is the largest and healthiest observed by local fishermen in over a decade. The devastating economic loss caused by these unjustified actions is a violation of National Standard 8 of the Magnuson Stevens Act. For these reasons, I recommend the following actions by the Council: Vote in favor of the emergency action, returning the Annual Catch Limit for the entire South Atlantic management are for cobia to 1.42 million pounds and the management boundaries to Key West-New York until the completion of a stock assessment. Request NMFS use smoothing methods/models to correct spikes in catch estimates for the past two years and beyond if needed. Author a recommendation requesting that ASMFC management of cobia should not start until a new stock assessment is completed or an Emergency Action is in place. States along the entire migratory route of "offshore" cobia, to which the SAFMC has jurisdiction from 3-200 miles, by law FMPs are required to have fair and equitable access and allocation. Fair and equitable should not be something that is subject

to "datasets" that ignore science and material facts in order to manipulate what is fair or what is equitable. There is no regulatory action the council can to take that would result in anything that resembles fair and equitable access under the current ACL and issues with MRIP estimates. I believe an emergency action option was written into law not only to close fisheries but to also provide an avenue for the corrective action to situations just like we are facing here with cobia. Thank You, Terry Plumblee

Frederick Kilgore; Tavernier, FL

I am against any "limitations of entry or permit" for any type of fishing segment! This is Anti-AMERICAN!!!! It is horrible financial encombrance against future, young, Am fishermen who want to get into the business. Current permit holders should not be given exclusivity over the permits. This monetizes the permits, and creates an industry of few permit holders that then lease out the permits which then puts additional "punitive" costs onto the "little guy" trying make an "independent living." I as a permit holder could benefit from this: 1) limiting my future competition, and 2) creating value to my permit which I could lease or sell. I also currently hold "Gulf of Mexico For Hire Permits. However, it is so objectionable in principle I refuse to lease or sell my Gulf Permits, and I definitly do not want this system for the S Atlantic or any other zone in US waters. This is exactly one of the reasons we revolted against the British Aristocracy and the Privileged Few that constantly strap the Little Man in taxes and fees to support the Aristocracy's lavish lifestyle. It is despicable, and contrary to "Life, Liberty, and the Pursuit of Happiness!" Obviously you all are being influenced by a "few prominent stake holders" and have lost sight of our history and promise by our Founding Fathers and all who have "fought and died for our freedoms!" Shame on you and those few pushing this abomination of an agenda! Capt. Frederick (Rick) Killgore USCG licensed since 1986, and in the charter business since 1978.

Walter Wilson; traviswilson904@gmail.com; Jacksonville Beach, FL

Not gonna beat a dead horse about all the obvious benefits to our state that would come with a recreational Atlantic red snapper season. My comment is to point out how ridiculous it is that somebody agreed there is a shortage in the population of red snapper. It's a complete loss of money coming in and if any more money is spent on research it absolutely wasted funds considering the evidence is flapping is in the face. No need to hire scientist. Why on earth don't the people taking data either by some scuba gear and dive in or fish w/ and charter captain on the east coast. There is not one captain who wouldn't jump in the opportunity to take whoever needs to got out there to get the right data. The fish have become a nuisance.. There is no excuse for this ignorance considering how easy it is to collect data. It's not tapping for oil. It's catching fish that you can't get away from... My point here is to look beyond why we need a season and point out how easy it is to get accurate data to base your laws on and it's not being done. It wouldn't cost the state a penny, because there are hundreds of certified captains who would love to take those guys out for free.

Wells Barker; wbarker1@ec.rr.com; Beaufort, NC

I urge the Council to drop all efforts to implement a limited entry program for the charter/head-boat fleet. It is not warranted and additional government rules/regulations/controls in an already over-regulated fishery is unconscionable. Thank you.

Devin Cage; devincage711@gmail.com; Manteo, NC

to whom it may concern, I've fished for cobia for the past 23 years on my charter boat out of Oregon Inlet NC. And we've always had big years and slow years depending on water temp and weather. We had slow years back 20 years ago before VA even caught cobia it didn't mean the stock was down. 1 cobia per person not including the captain or mate would never hurt that fishery. A total closure on a fish that migrates that far and grows so fast is ludicrous I'm fishing for them right now in NC and have seen fish for the past 3 weeks on every trip looking for them. Keep cobia season open. Thank you, Devin Cage 252-473-0700

Timothy Sedwick; <u>tim.sedwick@hotmail.com</u>; Charleston, SC Strongly OPPOSE.

William Kudlik; wku812@aol.com; Palm Coast, FL

These fish are so thick in most areas you are unable to catch anything else. At least allow seasonal recreational fishing and "limited" commercial permits.

Matt Lavette; <u>fishermattman@gmail.com</u>; Ormond Beach, FL There are so many red snapper atvmy fishing spots it is hard to catch legal Fish to Keep

Daneil Murphy, Ormond Beach, FL

Of the times that I've gone off shore over the last few years I'd say I've caught a significant amount of red snapper. On average, on most days, I'd say about one quarter to one half of all fish I've caught were red snapper. On one occasion last year, out of the 13 fish I personally brought up, 10 were red snapper. Anecdotal, perhaps, but when the majority of guys are saying the same thing, I believe we're seeing a trend that proves their numbers are going up. While I'm not a scientist, and there may be other factors at work here, I'd say that if a large percentage of your catch on most days is an "endangered" species, than perhaps the issue should be reconsidered.

Ellis Shifflett; timberghost73@yahoo.com; Richmond, VA

Please remove the no gaffing policy for cobia and lower the cobia length requirements to 36 and 2 a day with only one allowed over 50 inches from vessels with in 3 miles of land and three a day with a 36 inch minimum and only keep two per day over 50 from piers or beach anglers.the cobia numbers that were previously reported weren't an accurate indication of cobia numbers here in the Atlantic.the fishery is strong and numbers are soaring please reconsider the current legislation.on behalf of all recreational anglers thank you for your time and diligence.

(Same Comment) Alex Field; alex.field.05@gmail.com; Virginia Beach, VA Christopher Wickline; Cary, NC Louie Argiro; largi001@odu.edu; Chesapeake, VA Alex Coyner; Chesapeake, VA Sam Margalotti; s9131994@yahoo.com; Norfolk, VA Alex Brooks; siralexthegr8@gmail.com; Norfolk, VA Thomas Shoaf; mrthomasshoaf@gmail.com; Lexington, NC Jacob Zervakis; Jacob.zervakis@gmail.com; Seaford, VA Joshua Kaltreider; joshuakaltreider@gmail.com; Alexandria, VA Brittany Winn; bwinn27@yahoo.com; Currituck, NC Marvin Williams; leewill377@gamail.com; Norfolk, VA Jordan Elliott; jordanelliott08@gmail.com; Virginia Beach, VA Paul Park; paulpark1988@yahoo.com; Winterville, NC Brian Kemp; kempbrian6971@gmail.com; Moyock, NC Rob Choi; robchoi79@gmail.com; Midlothian, VA Samantha Bauer; bauer.samantha16@gmail.com; Southern Shores, NC Edward Eure; edwardeure757@gmail.com; Hampton, VA Daniel Powell; danielpowell793@gmail.com; Smears Ferry, NC Shane Hatcher; S.Hatcher25@cox.net; Virginia Beach, VA Richard Wisniewski; RDWisniewski@aol.com; Hampton, VA Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I Alex Field, write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages.

(Same Comment)

Chris O'Brien; cobrien08@yahoo.com; Norfolk, VA

Max Flowers; masflowers01@yahoo.com; Virginia Beach, VA

Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. I do not support state allocations under ASMFC, especially with current ACL segregation between NY-GA and East Coast of Florida. 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages. Thank you.

Julie Bryant; jbryant28@aol.com; Ormond Beach, FL

In April, May and June 2017 we've been or fishing several times. Every time we would pull up to a amber jack spot and drop down within minutes we would catch red snapper each 25lbs plus. I would like to see where you can keep a limit per person or per boat. You know the fish are abundant when ever time you go fishing you catch a good size one.

Nick Thomas; follylawyer@gmail.com; Folly Beach, SC

I strongly oppose for-hire limited entry. This is NOT about fishery sustainability it is about government infringing on the rights of citizens. I urge the council to avoid changes to the for-hire limited entry.

Lesley Dane; Charleston, SC

I am OPPOSED to for-hire limited entry! It is NOT a good thing!

Rick Caton; customsoundcharters@gmail.com; Hatteras, NC

1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages. Rick Caton CUSTOM SOUND CHARTERS F/V FREE AGENT PO Box 521 Hatteras, NC 27943

Keith Gossett; Murrells Inlet, SC

I believe it is unfair to limit a permit when there are already rules in place. Not fair to us fisherman that are trying to make a living. Especially when limiting the for hire charter and headboat permits.

Kristen Laga; Myrtle Beach, SC

Highly disagree with taking jobs away from hard working people.

Dylan Melson; Murrells Inlet; SC

Highly disagree with this effort of trying to take away the charter headboat permits. Taking jobs away from hard working people.

Peter Bessette; hotrod1282@gmail.com; Palm Coast, FL

I believe it's time to open up red snapper They are not endangered and even if you just open it up for one month or year or even several times a year for short periods it would be better than nothing

Johnathan Kusturin; <u>j.kusturin85@gmail.com</u>; Virginia Beach, VA I simply would like to state that I as a recreational fishermen spend time and money to go out and enjoy Cobia fishing and much appreciate having a season to look forward to every year

Russell Chesebro; <u>gonefishin327@yahoo.com</u>; Pomona Park, FL No catch limits!

David Stevenson; St. Augustine, FL I am opposed to for-hire limited entry

Richard Gomez; captainconch12@yahoo.com; Key West, FL

Most of the serious long time charter for hire businesses have been dealing with a continuously expanding onslaught of new charter businesses. The majority of us feel that limited entry on snapper grouper in the s. atlantic does not go far enough, but we appreciate that we have a beginning. We would love to see limited entry on not only all of our federal permits, we would also like to see the state follow

suit and do the same with our state charter for hire license. We would also like to let everyone know that we feel that due to the longline industry that has developed over the past number of years we have noticed a slow dwindling of our summer dolphin catches, culminating in the last 3 years of virtually a non existent fishery. I feel that long lines should not be used in that fishery as it is very obvious to us in south florida that it is not being sustained. I would hope that our concerns can move quicker then normal through the process, because my fear is that that fishery cannot continue at its present rate for very long.

Coleson Pokorny; bigdealsportfishing@gmail.com; Williamsburg, VA

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages. Thank you for your time and allowing me the opportunity to comment on this matter. I hope you allake the right decision for the fishery for years to come. Sincerely, Capt. Coleson Pokorny 757-645-8478 Big Deal Sport Fishing

Ryan Jordan; jordanr2@prodigy.net; Southport, NC

I am against a limited entry for charter capts in the SAFMC. As a current and 10 year charter license holder I feel that this is unfair to those who wish to enter into this profession, and numbers of permit holders has been dropping in the last few years as well.

Thomas Riley; tw700p@yahoo.com; St. Matthews, SC

I am opposed to limiting charter and head boat permits. This will not benefit the fisheries, only the charter captains and head boat captains already in business; ie a charter boat captain on the committee pushing this agenda. This agenda item seems to be self serving as was the commercial owners on the committee pushing for special exemption for their businesses otherwise known as catch shares. You individuals on the board are supposed to be working to restore fish populations, not line your pockets. The public is not as stupid as you seem to think..

Robert Powers; Murrells Inlet, SC

I am against limited Charter Head Boat Licenses. This will make permit holders tycoons like the catch shares in the Gulf.

Rick Baumann; <u>rick@murrellsinletseafood.net</u>; Murrells Inlet, SC Any measure that takes a step towards privatizing and catch shares is unacceptable.

Tony Englemeyer; <u>tengelmeyer@ouc.com</u>; Winter Park, FL The limitation of commercial snapper-grouper for hire captains is wrong.

Madl Lawhon; Marklawhorn@gmail.com; Murrells Inlet, SC

To limit for hire permit is wrong. It's just a backdoor to limit commercial permit fisheries. Catch shares of any kind is not and never will be the answer.

Albert, Hitchcock; <u>alhitchcockjr@hotmail.com</u>; Murrells Inlet, SC This is wrong please don't do this

William Hunsicker; <u>Captbill@endlesssummercharters.com</u>; St. Augustine, FL I am totally opposed to any efforts toward limiting the number of Charter and Headboats in the snapper-grouper fishery. You all need to spend your efforts in GENERATING Habitat for fish to grow, not limit fishing. The United States continues to grow in population, therefore the need for more fish! Stop limiting, get with the reality that we need to GROW the FISH POPULATION with Habitat, not limit fishing!!! There are many airplanes in deserts that rot, put them to good use, drop them in the OCEAN so the fishery can grow. Bait and fish accumulate quickly on anything in the ocean. Shouldn't your organization already know this? Stop being misdirected.....get more objects in the Ocean for the fish to grow.

Sheila Godby; <u>captsegull@suddenlink.net</u>; New Bern, NC PLEASE PLEASE: NO MORE REGULATIONS....NO MORE LIMITED ENTRY...NO MORE PRIVATIZATION OF OUR RESOURCES. Enough is absolutely enough.

Allston Leland; allstonl@aol.com; McClellanville, SC

I've been going offshore since about 1966 and making a living at it most of the time, starting off at about 6 years old hand lining black fish at night after we anchored up. Buy trying to limit entry to fisheries you are destroying the small fishing villages where families have always switched fisheries as cycles play out as they always do in fishing. As we have witnessed from the massive financial crisis we are still overcoming, big business does not always work well, even on systems they created, I can't imagine it ending well for small fishing villages when all you have is a cooperation to deal with when someone needs to fish to make their way for a family. Please don't "fix" anything else. Thank you for your consideration, Allston leland

Al Avena; <u>avenafish@gmail.com</u>; Murrells Inlet, SC No to charter permit catch share

Blkae Michael; Pozuosn, VA

Dear Members of the South Atlantic Fisheries Management Council Thank you for the opportunity to comment on cobia management in the Atlantic Ocean. I write to you today to ask that you support the adoption of the Emergency Action returning the management parameters for cobia in the Atlantic to those adopted in Amendment 18 until the completion of a new stock assessment and the selection of a scientifically credible measurement tool for determining annual catch. Those parameters include: a) management zone ranging from Key West to New York b) Use the ABC control rule established in Amendment 18 for cobia or 1.42 million pounds from Key West to New York. This 1.42 million pound ACL was in place until 2015. 1. We do not support state allocations under ASMFC 2. Demand NMFS use smoothing models/methods to properly account for spikes in MRIP's estimates resulting in catch totals 2 to 3 times historical averages.

Henry Hauch; henryhauch@gmail.com; Mims, FL

As a CFH permitted owner in the SA region, I firmly oppose the idea of limited access. As seen in the GOM, this can of worms serves little use and has created more problems than solutions. Like 99% of all Charter Captains I have spoken to, I to oppose any attempt to move forward on this agenda.

Dwayne Schalles; dlschalles@gmail.com; North Charleston, SC

Limited entry is bad for the small family fisherman and the communities they live is. Please stop supporting the big corporate entities who lobby for limited shares strictly to make themselves richer. Crushing the family fisherman making them pay to subsist is bad for the local economies and limits the local fresh fish available for small restaurants. Its death to local seafood markets in favor of national retailers and national foodservice providers. Plain and simple corporate greed.

David Sommers; divehatteras@aol.com; Frisco, NC

I totally oppose any limited entry effort in the commercial and charter headboat fisheries. Any movement towards a catch shares situation is completely unacceptable. Do not go down the path of privatizing the access to fishing efforts. There is no legitimate reason to pursue this effort under the guise of conservation. Also, why is this issue back again so soon? Did you not just reject a similar or identical proposal not very long ago due to overwhelming negative comments from those impacted by this. What market forces are pushing to have this again brought before you?

Ray Chaple; rchaple@hotmail.com; Clearwater, FL

I am 100% opposed to any implementation of catch shares being used as a fishery management solution. I has proven to be a failure in other attempts, is against congressional mandates, and most importantly is unethical to sell our public resources to a select group of people for profit, so they can just sell it back to the public!!! Fix the science 1st and then we can see if there is really an issue in any of the fisheries. If that turns out to be fact as opposed to an agenda, then we need to look at who is taking the largest quality of the resource. Logic then dictates that the ones catching a larger share should be restricted further. Not the recreational sector who has had their shares cut exponentially compared to the commercial sector. Thanks for you consideration, Ray C.

Raymond Bourque; <u>blades1 99@yahoo.com</u>; St. Petersburg, FL Taking the public resource and giving the right to the fish to only a select few is a terrible miscarriage.

Michael Mason; michaelmason@hotmail.com; Charlotte, NC

Vote NO against for hire limited entry. It limits competition and it totally unnecessary.

Steve Mueller; <a href="mailto:steve-muellers-steve-muellers-steve-muelle-stevee-steve-muelle-stevee-muelle-stevee-

Being out of town the first week of June I won't be able to go Red Snapper fishing in 2017. If the council is concerned about Snapper populations close the entire season and access to protect the resource.

Marc Jordan; <u>marc@northmyrtlebeachchamber.com</u>; North Myrtle Beach, SC We represent 850 business members, some of which earn their livelihood on the water as commercial and recreational fisherman, and boat captains. WE remain consistently OPPOSED to Limited Entry measures. Marc Jordan- President/CEO North Myrtle Beach Chamber of Commerce, CVB

Jeff Andress; tpe jeff@rocketmail.com; Mims, FL

I am strongly opposed to limited entry permits or commercial catch shares under any circumstances. If the fishery is in an un- sustainable condition. No one should be permitted, period.

Eugene Mast; sirggg50@yahoo.com; Boynton Beach, FL

This is way to political and some one has to put a stop to this ! Its bad for us recreational fisherman , and drives cost thru the ceiling !!!!!!!!! Please don't let them take our fishing rights away !!!!!!!!!

Daniel Connolly; ofishalexp@gmail.com; Murrells Inlet, SC

I am an inshore charter captain in South Carolina who believes strongly that the for-hire/commercial market for this fishery should not be controlled or limited to a small group of members. In this country we live in, The Unites States of America, any man or women who is willing or aspiring to be in this business should be allowed to do so with the proper permits/licenses required. This ruling may not affect me personally as a professional inshore fisherman but I am a man who stands for what is right, and a limited or controlled group is not. On the issue of migratory cobia, my opinion on the matter is in favor of an open fishery with stricter regulations on size and quantity across the board in every state applicable. One state should not be allowed to differ from the rest, nor do i believe that this fishery is in as much trouble as numbers may show. With all of that being said a majority of the entire east coast fishery for many species would be in much better shape had we implemented and enforced stricter regulations years ago. Instead we now have closed fisheries, angry business men, and varied discrepancies from state to state over monies lost from these closings. Resolve on these matters must be made across the board in a fair and unbiased manner. Thank You, Capt. Dan Connolly

Tony Handcock; Jax, FL

I oppose area and depth closures for grouper snapper management I oppose limited entry in aspect of commercial fishing and believe market forces should dictate a successful operation once TAC and seasons are set. I suggest a 1 fish per person limit on red grouper and red snapper and a commercial limit of up to 100 pounds per trip or 25 per day for both species until sound surveys can be had for both species. I do not believe the current stock assessments to accurately reflect the status of either.

Rusty Winters; Charleston, SC

Snapper covered up EVERYWHERE!!!!!!!!!! Come On

Karla Gunter; khgunter1977@yahoo.com; Myrtle Beach, SC

We don't need fishermens rights to be violated anymore than they already have been - no more restrictions and limited " catch share " agendas . Your only going to hurt families that have depended on this industry for decades. Go put your restrictions on the factories that pollute our rivers and poison our estuaries!!! Wake up NMF!!!!! Enough is enough!!!!

Eric Engelke; btstrailers@hotmail.com; Surfside Beach, SC

Catch stairs needs to stay in Florida. Bad idea for the regular guy and the charter guy. What about there customers do they count at all. No, no, no. Stay out of SC.

John Summers; jacksummersfl@yahoo.com; Stuart, FL No catch shares in any form, no matter what you call it. No catch shares in the south Atlantic region.

Russell Glover; englis1970@yahoo.com; Murrells Inlet, SC

The limited access on for hire/charter boats is not an issue. The limited access needs to be to the government and their involvement in our resources. It's time for y'all to push for some changes to Magnuson and to give the fishermen more rights instead of taking them away. The Cobia closure was a terrible thing for SC but not effecting any other state and the ACL is still getting raped by these other states in (State Waters) since these fish are migrating along the beach with the bait for the most part anyway. Less Regulations on our Commercial and Recreational fishermen should be first and foremost right now

Ben Black; Blackb65@yahoo.com; Charleston, SC

NO CATCH SHARES! SAFMC should not pick the charter and head boat operators! Thank you, Capt. Ben Black

Stephen Nettles; Charleston, SC

Please stop trying to limit the number of for hire vessels in the south atlantic. You are putting undo pressure on people that are too young to speak at this time. I know because the council has already done it to me. I want to run my own commercial snapper grouper boat. However, buying the boat and then having to purchase permits that are around \$50,000 that someone only paid \$25.00 for is terrible. All of this because I was to young when these decisions were made and didn't have a permit. Since the 2007 reauthorization of the Magnuson-Stevens Act, which mandated very conservative Annual Catch Limits for all fisheries, for-hire fishing effort in the South Atlantic has plunged by nearly 40 percent from a peak of 306,441 angler trips in 2007 to just 188,114 trips in 2016. Most recently trips fell by 2.4 percent from 2015 to 2016. The amount of business is going to control the fishing trips more than limiting the number of for hire permits. We also visited this in December. So why are we revisiting this again? Is this a Farce for something else?

Rep. Lee Hewitt; <u>lee@hewillforhouse.com</u>; Murrells Inlet, SC I've attached a letter in opposition to for-hire limited entry in the snapper-grouper fishery.

Jason, Alberti; Jason.alberti@gmail.com; Hampstead, NC

Stop trying to limit access on a public resource. When you reduce bag limits and shorten seasons. Commercial and charter boats are left trying to catch whatever is possible in order to keep clients happy and keep bills paid. When trolling is slow people need a back up like bottom fishing for snapper and grouper to have limited access would cripple current charters and keep new businesses and tourism from flourish ingredients.

William Gorham; Southern Shores, NC

I would like to put on record that stakeholders in North Carolina and Virginia have again via community funding, come up with the dollar amount required to have one representative attend and give public comment on their behalf. This is the 5th SAFMC meeting in which stakeholders from both states have done so. Due to a family health issue I am unable to attend the June SAFMC meeting and provide public comments. 1. It is clear an Emergency Action is justified. ASMFC can still take over managment, but only with reverting back to Amendment 18s stock boundary and ABC control rule it will prevent great loss of access, prevent economic hardships, and allow for more rational targets levels in managment. Current MRIP estimates have Atlantic stock 200% over ACL, with an EA as described that percentage goes to under 20% (yes even when adding EFLA catch). 2. In no discussion or official document has it ever been determined/disclosed that every bullet point of the Emergency Action criteria must be met prior to moving forward with an Emergency Action. - Claiming such, I believe is an attempt undermine the full intent of the purpose of an Emergency Action option. 3. Amendment 2's daily bag, creel, and boat limits along with AMs can still move forward. 4. If the council does not bring for and pass this Emergency Action, that without question is in the best interests of each state affected by the current stock boundary and allocation, than let history show they failed to do everything within their power to correct what is clearly an emergency. 5. Per the result of SEDAR 28 cobia were NOT over fished OR under going over fishing their for Nat 1 does not trump, as the resulting regulation and unwillingness of NMFS to use smoothing models to spikes in MRIP, has manufactured an OF situation. 6. ASMFC, "spawning" closures, it is nothing more than a reflection of peak fishing effort in each state and for some

states it is grossly wrong. I have read the SC study that took place over two years and centered around the same tournament. Even that study disclosed finding cobia eggs in water samples outside of the "speak effort" of May, and due to fishery changes, a lack of fish samples could not provide insight into other possible peak spawning times outside of when the most amount of fish samples. 7. ASMFC, we do not want state allocations without reallocation of the million ACL. Again, we do not want state by state allocations under the current 620k ACL. I took forward to hearing the discussion today and hope every council members has a chance to read this.

Rom Whitaker; <u>rom@hatterasrelease.com</u>; Hatteras, NC I am opposed to any type of limited entry in the Charter Headboat industry

Brett Colley; Ormond Beach, FL

The red snapper population is out of control. Please allow the recreational angler a chance to catch and keep the fish.

Allen Mills; captallen@accharters.net; Fernandina Beach, FL

I am in support of for hire and limited entry for feral waters permits. it works in the Gulf and has proven success and we need it on the east coast. it will help you all with your fish report and help control the number of permits and with that control the fish stock. win win for all. thank you Capt. Allen with www.accharters.net

Brian Loftes; bkloftes@live.com; Wakefield, RI

catch shares and limited entry don't let them do it catch shares destroyed ground fishing in new England before long they will be traded on wall street and don't for get UN agenda 21 the route of it all.

Michael Plowman; plowhandle@windstream.net; Harrisburg, NC

I am against the limiting of charter/headboat trips or catches in the snapper/grouper fishery. Tens of thousands of us rely on them to fish offshore for the above species.

Mike Nelson; fish.knotonduty@gamil.com; Port Orange; FL

SAFMC, I'm a second generation fisherman, fishing out of Ponce Inlet Florida. I'm writing concerning the unnecessary closure of red snapper that has plagued the South Atlantic for the past 8 years. The fishery was building due to the 1992 regulations, which were necessary due to the low numbers in the 80's but since the 92 regulations were applied they were recovering and we were catching these fish like I had never seen in the past. All the early fishermen including my father say they've never seen the RS in the numbers they're seeing now. These fish are taking over reefs and running other species off due to their aggressive nature and aggressive feeding. They also eat smaller fish that would normally be able to thrive if this fishery was well regulated. This fishery should've never been closed. The closing of this fishery has decimated the coastal economy in the SA, it has caused businesses, including charter boats, and tackle shops, to go out of business and has hurt the supporting businesses like restaurants, hotels, gas stations, boat builders and their supporting businesses. This was all unnecessary and caused by flawed, out-of-date science. This fishery should be opened immediately, so the coastal economy can recover back to what it once was. The recreational reporting will obviously be flawed. What should happen is all recreational anglers that fish federal waters should be required to have a separate federal license/permit. As a for-hire charter boat owner/operator I have to carry a federal permit and state license, even though I only fish federal waters. It will bring in more money, which could be used to do more for the fishery. Concerning the commercial RS fishery. I believe it should be limited to a trip limit and a yearly quota. We should be allowed to fish this viable, thriving fish to supply our local restaurants

with locally caught fish, which would create more jobs and also help the economy. There should be moratorium placed on for-hire permits, the business is being flooded.

Rick Caton; coustonsoundcharters@gmail.com; Hatteras, NC

The Cobia fishery is in great shape .You clowns even said that the fishery 'Was not over fished NOR enduring any overfishing".....You ass clowns said that yourselves.....The main problem with the Cobia Fishery is you ass wipes destroying it.....plain and simple...And secondly that we all believe that your in bed with the "Ocean Blue" crowd I would like to think that somewhere down the that the Trump Administration will do away with you ass clowns.....I don't know how you all sleep at night

Peter Boehm; sustainableshark@yahoo.com; Key Largo, FL

Dear Members of the SAFMC, The Wreckfish program is working very well, please don't make any changes to it. I wish all of the other fisheries I participate in could be as efficient. I am grateful for the simplicity and urge the council to maintain the status quo. Thank you very much for your consideration and the opportunity to comment via email. Sincerely, Pete Boehm F/V: Hanna Katherine