

Public Reporting

The South Atlantic Fishery Management Council



Public Comment Form

Meeting

March 2023 Council Meeting

This Council Meeting comment form will be open from 2/17/2023 to 3/09/2023.

Submit Date	Submitted By	Location	Affiliation	Comment
2/28/2023	First Name: fletcher Last Name: hallett Email: fhallett@hallettins.com	City: st. augustine State: Florida	Private Recreational	i would like the council to take more into account the high prevalence of red snapper when evaluating the option of having a red snapper season this year. maybe an option would be to open snapper to 1 per person and 2 per boat with a maximum size limit for the summer months. the Gulf has proven that longer seasons are doable for their population but i have not been able to find data to back up that a similar model would not work in the South Atlantic. It appears from most recreational anglers that (specifically) in NE florida our huge ARS population is detrimental to many other reef species. We believe that the ARS is effectively destroying our wrecks and reefs.
2/28/2023	First Name: FLETCHER Last Name: hallett Email: fhallett@hallettins.com	City: ST. AUGUSTINE State: Florida	Private Recreational	I strongly oppose DRAFT Regulatory Amendment 35: the amendment mentions dead discards as being the reason for needing the amendment, however, i am unable to understand exactly how the dead discard data is collected. the amendment cites "actual and projected" use of descending devices, however, does not cite exactly how that data has been collected. until there is a better understanding of dead discards, i have to oppose this amendment. maybe there can be a better explanation of how that data is collected? from the fishermen's view, we have an overpopulation of red snapper. maybe a small boat limit and longer season should be considered? i would like to see discussion around a one fish per person, 2 per boat limit with a max length season allowed for the duration of the summer months.
2/28/2023	First Name: fletcher Last Name: hallett Email: fhallett@hallettins.com	City: st. augustine State: Florida	Private Recreational	in the DRAFT Regulatory Amendment 35 it notes in several places that ARS are over fished and under going over fishing. This evaluation is contradictory as it also says the council recognizes the high prevalence of the ARS in the south atlantic.
2/28/2023	First Name: Brian Last Name: Brown Email: Bbrown73@gmail.com	City: Jacksonville State: Florida	Private Recreational	As a long time fisherman and diver off the NE coast of Florida I would like to express my views of the current red snapper fishery here. While the ban has helped increase the numbers of redsnapper in the ocean, I believe that it has had a negative impact on other species such as grouper, seabass and vermillion snapper. Before th ban we used to routinely see and catch grouper inside of 20miles. I can't tell you the last time I caught one or even saw one on the near shore structures. The over abundance of the more aggressive ARS have out competed the population of grouper. I believe the ARS have been eating the future beeliner and seabass stock to a point that their numbers are being affected. The ban has essentially created an imo balance of ARS. As for the future harvest regulations and dates, I feel that for the safety of everyone, the season should be spread out over weeks and or months similar to the Gulf coast. This past year, I saw too many smaller craft taking chances on the few days we had. They not only endanger themselves, their crew but also first responders that might have to make a rescue. It isn't safe to make the season in the middle of hurricane season. Please take these comments seriously and do what's right. Give us some more days to fish for ARS for the safety of all and the betterment of other species.
2/28/2023	First Name: Aaron Last Name: Dial Email: Aarondial30@icloud.com	City: Palatka State: Florida	Private Recreational	Red Snapper have completely over run our reefs and wrecks. You need to open more days so we can thin out the ARS so other fish can thrive in these places
3/1/2023	First Name: Last Name: Email:	City: State: Florida	Private Recreational	I believe that American Red Snapper are being mis managed along the Atlantic waters of Florida. The species is being represented as endangered, when they are actually thriving in our Atlantic Ocean. The limited number of days to fish for and keep these species is an issue for us as recreational anglers. You absolutely cannot fish some spots because the Red Snapper have taken over. Please let us keep Red Snapper for more than one weekend in Atlantic Waters. We all, recreational anglers, feel we are being robbed of the resource. The commercial guys get more days, and that's wrong.
3/1/2023	First Name: Ian Last Name: Schurman Email: Schurman116@hotmail.com	City: St Augustine State: Florida	Private Recreational	Red Snapper is out of control! It's is so blatantly obvious that red snapper are over populated in NE Florida waters I don't know how this is even still a question! You can pull up to almost any wreck, reef, or ledge and the ONLY fish are red snapper. We don't catch mangroves, lane, sea bass, vermilion, triggers, or anything else because it's just red snapper and lots of them. Many places you can't even get a bait to the bottom. PLEASE open a reasonable season on red snapper for RECREATIONAL fishermen.
3/1/2023	First Name: Ben Last Name: Banks Email: benjaminbanks12@gmail.com	City: MIDWAY State: Georgia	Private Recreational	I won't be attending the meeting in person, at it has become clear to me that this Council could care less about the recreational fishery in their decision making processes, so I see no need to waste my time. My experience is the same as other commenters - the mismanagement of ARS is negatively impacting multiple other species off the Georgia coast. The mortality rates are no where near what the Council assumes. Most of our ARS are caught in 40-80' of water, where a decending devices successfully returns them to their habitat. ARS account for 90% of our catch when bottom fishing - and we're trying NOT to catch them. It is easy to catch 100 ARS in a 4 hour trip, but it has gotten more difficult in recent years to catch BSB, Grouper, Vermillion, etc.. 16 U.S.C. 1801 section 101-627, 104-297(3) states the purpose of the Magnuson-Stevens Act is "to assure that the national fishery conservation and management program utilizes, and is based upon, the best scientific information available; involves, and is responsive to the needs of, interested and affected States and citizens . . . and is workable and effective;" The mismanagement of ARS (through by SAFMC admission, is at all time high population levels) is not based on the best scientific information available, does not factor in the needs of interested citizens and is not workable and effective. Further action to reduce catch levels of this species, which negatively impacts other species is in violation of the Magnuson-Stevens Act. If the expert scientists from Canada cannot find sufficient evidence this species is overpopulated, they need to seriously reconsider how they collect data - perhaps by using someone who knows how to fish in this area.

3/1/2023	First Name: Robert Last Name: Riggins Email: bobrjaxfl@gmail.com	City: Jacksonville Beach State: Florida	Private Recreational	There are alot of red snapper every where. The idea that the kill rate on catch and release is extremely high, is extremely silly. It just isn't so. If the Gulf Coast can manage it better, lets get an East Coast management team. It just isn't right to stop all red snapper fishing when the counting methods are sooo out-of-date. Enough is enough. There are plenty of red snapper for the recreational fisherman to bring home 2 each for a real season. The day or weekend season is a joke.
3/1/2023	First Name: Calvin Last Name: Deloach Email: rickydeloachfishing@gmail.com	City: Richmond Hill State: Georgia	Private Recreational	The distance that we have to go off of ga to catch red snapper is restriction enough. 40 mile runs meen you need atleast a 23 foot boat and good weather. OPEN it up for more than a weekend
3/2/2023	First Name: James Last Name: Hull Email: hullsseafood@aol.com	City: Ormond Beach State: Florida	Commercial, For-Hire, Wholesale/Dealer /Retail	<p>3-8-2023</p> <p>SAFMC Thank You for the opportunity to comment on meeting agenda items. The SSC works for the Council and Determines BSIA used for Management.</p> <p>It is vital that you choose SSC members who have not only the educational credentials but also an appreciation for common sense and reality, as well as time and experience on the water with the SA species they will be assessing and determining stock status for.</p> <p>Fisheries science conclusions and theories from historical text may not apply to the realities of our current changing ocean environment. Stock status determination made from past assumptions, ideas and theories may not identify the current realities of our fisheries. Please choose SSC members who are open to new ideas and methods for determining stock status. I would use SA Red Snapper as a perfect example. A stock with the highest abundance, productivity, recruitment and latitudinal range expansion ever observed or recorded.</p> <p>Yet this stock is considered overfished and overfishing occurring by your SSC using an age-based assessment model that is data poor in many important inputs. Clearly with the use of common sense you would determine that SA Red Snapper is not overfished and overfishing is not occurring. I believe that abundance is far more important than age with Red Snapper.</p> <p>It is important that you expedite the electronic commercial logbook amendment. Commercial sector landings, discard, effort and economic data is the most accountable, reliable fisheries dependent data you have. Make it better by getting this done.</p> <p>I support the development of MSE for the SG fishery.</p> <p>I support the attempts in Amendment 35 to reduce Red Snapper encounters and dead discards. But much more must be done starting with my comments above and a new method by the SSC of determining stock status, using abundance, productivity and recruitment rather than age- based model.</p> <p>I support Amendment 46 Permitting and Reporting option 3 sub option 3a. Private recreational accountability for number of participants, effort, landings, discards, and economic data must happen ASAP or all of our SG fisheries will become dead discard fisheries with no harvest. Private recreational reporting should not have been removed from this amendment. The successful projects of the citizen science program with reporting on electronic devices could be used to develop a required reporting method.</p> <p>I have been fishing my entire life. It has been a difficult struggle to be a commercial food producer in the SA SG fisheries for the last 20 years. So much has been taken away from the commercial sector. We are food producing harvesters, creating dead discards does nothing for us. We should be retaining what we catch. Mis management based on inaccurate scientific stock status determinations both of abundance and depletion has forced managers to make decisions that have harmed people, businesses, coastal communities, fish and the ocean ecosystem.</p> <p>All Atlantic Councils, Science Centers and Commission met just a few weeks ago to brainstorm ways to improve fisheries management under our ever-changing environment. We must think outside the box to improve the science and management of SA SG fisheries and move beyond the normal way of doing things. What has worked in the past may not be the best given the current changing reality seen on the water.</p> <p>I hope we can turn this off course ships wheel in a new direction of reality that will create harmony with science and management for future generations of people and fish.</p> <p>Captain James G. Hull Jr. Ponce Inlet Fl.</p>
3/2/2023	First Name: Chris Last Name: McCaffity Email: freefish7@hotmail.com	City: morehead city State: North Carolina	Commercial	<p>March 2023 South Atlantic Fishery Management Council Meeting Public Comment</p> <p>Massive area closure proposals in Amendment 17A to reduce Red Snapper discards brought recreational and commercial fishermen together over a decade ago to oppose those draconian measures. Our united front helped stop the closures that proved to be unnecessary as stocks have rebounded beyond historically high levels. Fishermen have discarded Red Snapper for years between limited openings to help the stock rebuild. We have obeyed circle hook and descending device requirements to help reduce discard mortality. We willingly did our part hoping to be rewarded as Red Snapper replenished. Council staff sent me an email back in 2013 showing projections from SEDAR 24 that by 2019 we should be allowed to eat 898,000 pounds of Red Snapper with 112,000 pounds being allocated to dead discards. Maybe the council confused these numbers in an honest mistake as they seem to have been reversed. Unfortunately, it appears the council just changed the model to something more complicated that assumes worst-case scenarios for assumptions on effort, landings, and mortality rates. Now the council plans to punish us for following their rules by shutting the fishery down completely even as Red Snapper are overrunning reefs to the detriment of most other fish. The excuse is they want more fish to be slightly older. Planning to waste MILLIONS of pounds of seafood by forcing fishermen to discard hundreds of thousands of Red Snapper defies all logic and common sense. The council is rushing to close our fishery before this year's scheduled season and a recreational fishing license can be created to provide real data rather than extrapolated assumptions.</p> <p>An overabundance of Red Snapper threatens to collapse the entire population along with other seafood stocks as hungry snapper deplete their food supply. One logical solution to address the issue of too many young Red Snapper would be encouraging fishermen to keep smaller fish and responsibly release most large ones. Perhaps recreational fishermen could be allowed to keep two fish under twenty inches or one over during the short season. The council could ask commercial fishermen to target Red Snapper under five pounds for consumers to enjoy. This would provide better data than a complete closure without needlessly wasting tons of seafood. The council could try encouraging certain behavior with a yummy carrot instead of always beating us with regulatory sticks. We could set an example for solving problems with more freedom rather than liberty-limiting laws.</p> <p>Please table Amendment 35 and focus on creating a recreational fishing license to provide much better data on effort, landings, and discards. Please don't get caught up in the rush to waste our resources and restrict our freedom when it is absolutely unnecessary. Please do not feel compelled to do something so obviously wrong when we could solve the problem with much better solutions that benefit everyone including you and this council.</p> <p>I am happy to answer any questions and/or provide more detail. Thank you for your time and thoughtful consideration.</p>

3/8/2023	<p>First Name: James Last Name: Hull Email: hullsseafood@aol.com</p>	<p>City: Ormond Beach State: Florida</p>	<p>Commercial, For-Hire, Wholesale/Dealer /Retail</p>	<p>March 8, 2023 South Atlantic Fisheries Management Council 4055 Faber Place Drive, Suite 201 North Charleston, SC 29405</p> <p>Re: Written Comment for March 2023 SAFMC meeting</p> <p>Council Members:</p> <p>Thank you for the opportunity to address the important agenda item concerning Snapper-Grouper Regulatory Amendment 35 on Red Snapper & Release Mortality Reduction.</p> <p>As a stakeholder I am forced to accept the unrealistic results of the SEDAR 73 stock assessment status for red snapper. My comments are in response to the base run model and inputs that were chosen by your SSC. In the model results dead discards of Red snapper from the recreational snapper-grouper fishery continue to be the primary factor slowing the rebuild of this stock and the re-opening of the South Atlantic Red snapper fishery. The SEDAR 73 stock assessment estimates that 500,000 to 800,000 Red snapper are killed each year as recreational fleet discards, we must turn dead discards into landings. This is mis-management and an unsustainable loss of Red snapper in the South Atlantic. I support management strategies that can reduce it. As Council members, you also are forced to manage the stock with the results of the SEDAR 73 SA Red snapper model that continues to provide unreliable stock status benchmarks that affect the livelihoods of fishermen in the South Atlantic.</p> <p>Council Leadership has demonstrated and stated that when the stock is considered rebuilt you will have no more Harvest or discard mortality yield than the current level. The Private Recreational sector is overcapitalized and has unlimited access to a Limited resource. If this overcapitalization continues all of our S/G fisheries will become dead discard fisheries. The Council must and should have implemented management measures in Amendment 35 for the Private recreational sector to become accountable, controlled and sustainable. The Private recreational dead discard problem has destroyed the accountable managed, sustainable harvest of the Commercial sector and seafood Consumers. A S/G bottom fishing season by area or time for the Private recreational sector could solve this year-round dead discard mis-management. The vast majority of private recreational anglers' fish on the weekends and during the summer months. I ask you to research seasons for the private recreational SG sector ASAP.</p> <p>Problems with the S73 BAM model for Red snapper</p> <p>Problems continue to affect the ability of NMFS to accurately assess the South Atlantic Red snapper stock. The stock assessments will continue to be hamstrung by the use of Chevron traps and affixed stereo-cameras that routinely underestimate the stock structure for the simple reason that: 1) the trap selects for small fish, and 2) the camera can only estimate Red snapper length but not age. This is problematic for an age-based BAM model, where Red snapper age is largely indiscernible for fish that simple don't grow much longer in length after age 10.</p> <p>Both the FWC's Repetitive Timed Drop (RTD HL) fisheries independent index of abundance and the Captain's Choice handline (CC HL) index have been demonstrated to catch (and provide age information on) Red snapper that are neither caught in the Chevron trap or seen in the Chevron Trap's affixed camera.</p> <p>From S73 RD-02 (pg. 21), the Florida FWC reported:</p> <p>"Overall, Red snapper captured in Chevron traps had smaller average length than those in the stereo-camera. This is largely attributable to decreasing capture probability with increasing size, especially in individuals over 600 mm FL [\sim > age 4].</p> <p>In contrast, the hooked gears captured larger Red snapper on average than were observed on stereo-video."</p> <p>Science center leadership has stated in the past that cooperative hook and line sampling similar to RTD would be implemented at a federal level in the SA range. Hook and line sampling should be a priority to get a more accurate age structure of our S/G species.</p> <p>Why do we not have cooperative fisheries independent hook and line sampling on a closed fishery?</p> <p>"Red snapper recruitment is that of a rebuilt stock"</p> <p>South Atlantic red snapper recruitment rates have been spectacular for many years. This has been obvious to NMFS stock assessment scientists who said in S41, "red snapper recruitment in the South Atlantic is that of a rebuilt stock." Fishermen from Florida to North Carolina with their observations on the water have observed and told you the same. SAFMC staff have presented you a SG Amendment 35 option of opening the recreational fishery for just one day in the summer of 2023 and reducing the commercial harvest in half. At the same time, if these Red snapper recruitment rates continue, the S73 SA RS SAR indicate the stock will be rebuilt within 5 years and overfishing will no longer be occurring.</p> <p>Why did the SSC not choose high recruitment in the model, when recruitment is that of a rebuilt stock?</p> <p>The S73 RS model is sensitive to Natural Mortality estimates</p> <p>Natural mortality estimates play a driving role in stock assessment model benchmarks and was a significant source of uncertainty in the S73 SA RS assessment (see SEDAR 73 SAR). The estimated natural mortality rate which determines rebuilding age structure has been changed in successive SEDAR SA Red snapper stock assessments, from M=0.13 in S41 to M=0.11 in S73 utilizing different methods of estimating M. Also, setting the Natural Mortality much higher at M=0.2, as was done in a model sensitivity run actually improves the stock status to a rebuilt stock status of Not Overfished and much lower Overfishing rate.</p> <p>How is that possible? Killing more fish with M creates a rebuilt stock in the model and reduces overfishing faster.</p> <p>Clearly the SEDAR 73 model results to stock status are inaccurate and do not represent reality as seen in the ocean. During SEDAR 73 assessment I asked how many Red snapper over 20 years of age had been observed from the age readings. The response was that in the last 42 years 30,705 fisheries dependent samples have been taken. This resulted in only 141 Red snapper over 20 years of age. It is time for the NMFS to admit that we are never going to rebuild the Red snapper stock to have an abundance of over 20 up to 51 year old fish, as used in some Natural Mortality estimates. But from a population sustainability perspective, using a 28 year old fish as a rebuilt target will suffice. The difference in this life history model estimate is literally the difference between having a nearly rebuilt stock versus one estimated rebuilt in 2047.</p> <p>It is time for the council to advise their SSC to use abundance and recruitment as the primary indicators of determining stock bio-mass and harvest levels. SEDAR is currently conducting a multi-year research track assessment for red snapper, now is the time to fully engage with your SSC to implement changes so the model better resembles reality of the ocean.</p> <p>Thank you for your consideration of this comment.</p> <p>Respectfully, Jimmy Hull Ponce Inlet FL.</p>
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3/8/2023	First Name: David Last Name: Rathke Email: execdir@resiliencyflorida.org	City: Tallahassee State: Florida	Non-Govt Org (NGO)	<p>March 8, 2023</p> <p>South Atlantic Fishery Management Council 4055 Faber Place Drive, Suite 201 North Charleston, SC 29405</p> <p>Re: Written Comments on the Policies for the Protection and Restoration of EFH from Beach Renourishment and Associated Large-Scale Coastal Engineering</p> <p>Dear Council Members:</p> <p>Thank you for the opportunity to comment on the SAFMC's Policies for the Protection and Restoration of Essential Fish Habitats from Beach Renourishment and Associated Large-Scale Coastal Engineering, Draft Revised February 2023. In reviewing the draft, Resiliency Florida continues to have concerns about the policy recommendations, including those initially expressed in our comment letter dated December 5, 2022.</p> <p>The Council's stated policy finds that beach nourishment project activities may cause impacts to essential fish habitat and recommends new and updated best management practices for these activities – some appear to be based on limited, selective, and dated references. And some are based purely on inference and opinion as previously stated.</p> <p>Resiliency Florida requests further investigation by the Council before adopting new policies on beach nourishment. The result of adopting any unsubstantiated policies will cause delays in projects intended to protect critical infrastructure and cultural and environmental resources from coastal flooding and erosion impacts.</p> <p>Before adopting new policies and best management practices, I respectfully recommend the Council conduct a comprehensive review of the available data from beach nourishment programs and assess the best management practices that are already in place in each of the effected states. By law, Florida's joint coastal permitting program has extensive resource protection measures and monitoring protocols in place to help protect natural resources.</p> <p>Additionally, there are recommended BMPs that have no basis for adoption and will not produce meaningful results. For example, BMP #2 is the identification of cumulative impacts that includes impacts of associated regional dredge projects that are geographically and ecologically related. As previously mentioned in December, there have been studies of beach renourishment and coastal engineering projects that have found the impacts are temporary in nature. The AP document makes no reference to the temporary nature of these impacts. What useful data can be collected for evaluation when there are known short-term decreases in abundance and changes in composition of species at most areas? As to BMP #3, why should dredging be limited to bathymetric peaks when oceanographic characteristics were found to play a larger role in influencing distribution of certain fishes than geomorphological ones? Resiliency Florida further disagrees with BMP #6, which states habitats designated as EFH-HAPC or recognized in state-level natural resource management plans should not be used as borrow areas for sand mining. There is no basis for a wide-sweeping exclusion zones of these public resources. This is especially concerning given large sections of the South Atlantic Ocean are identified as EFH or EFH-HAPC by SAFMC. Lastly, we disagree with the very concept of EFH consultations being used to direct potential research by the regulated community at its cost.</p> <p>Resiliency Florida formally requests the recommended policies and BMPs not be adopted as stated in the February draft document. We also recommend the Council perform a comprehensive review of existing beach nourishment monitoring programs and post construction reports in the effected states to help inform the direction of future BMPs.</p> <p>Sincerely,</p> <p>David Rathke, Executive Director Resiliency Florida</p>
3/8/2023	First Name: Pepper Last Name: Uchino Email: pepper@fsbpa.com	City: Tallahassee State: Florida	Non-Govt Org (NGO)	Comments submitted via email