

Public Reporting

The South Atlantic Fishery Management Council

Public Comment Form



Meeting

March 2024 Council Meeting

Written public comment for this Council Meeting will be accepted from 2/16/2024 - 3/8/2024. More information about the meeting can be found here: <https://safmc.net/events/march-2024-council-meeting/>

Submit Date	Submitted By	Location	Affiliation	Comment
2/23/2024	First Name: Chris Last Name: McCaffity Email: freefish7@hotmail.com	City: Morehead City State: North Carolina	Commercial	Thank you for rescinding Regulatory Amendment 34. Reducing Red Snapper Regulatory Discards and projected Dead Discards can be accomplished by managing quotas to avoid complete closures. A recreational fishing license with nontransferable Red Snapper tags would help. Each license holder could get several tags that must be placed on the fish before putting it in the cooler. Each tagged fish should be reported within 7 days of landing. Commercial quotas could be reduced to a 50 pound By-catch Allowance, so the season is open longer. These solutions should allow more of the Total Allowable Catch to be allocated to landings rather than projected dead discards. This would further reduce Regulatory and Dead Discards. Our shared goal should be to make Regulatory Discards rare while using Best Fishing Practices to increase survival rates for released fish. Stocking Red Snapper could be another way to allow more sustainable harvest. Please consider making a formal request under the National Environmental Policy Act to stock offshore species such as bass, snapper, cobia, mahi, and triggerfish as a mitigation measure for the negative impacts of offshore wind farms on our fisheries. Please also ask that the base of all new windmills be designed as a permanent artificial reef habitat that can be dismantled to a safe navigational depth when decommissioned. Please count fish living around windmills in stock assessments. Please support a moratorium on farming fish in Public Waters. Public Water aquaculture should be limited to stocking native seafood that can naturally reproduce. We should never introduce genetically sterilized or otherwise modified species in our Public Waters. Finally, please consider options for returning privatized Wreckfish Public Resources to the public so they don't end up being owned by global corporations or foreign nations. Thank you, Chris McCaffity

3/4/2024	<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>Council Members: Thank You for the opportunity to comment on some important Agenda items.</p> <p>1, I support the Mackerel AP and the council's goals and objectives on conducting port meetings with fisherman and stakeholders. This will provide a real time assessment of current management effects on Fisherman and the stock.</p> <p>2, SEDAR 90 Red Snapper assessment terms of reference. With Red Snapper stock abundance, recruitment and expansion at all-time high historical levels, it's time to use a different MODEL. The current age-based BAM model has failed us in our ability to interpret a successfully rebuilt SA Red Snapper stock. Obviously, Abundance is much more important than age with SA Red Snapper. I would ask the council to require their SSC to include an assessment model based on abundance rather than age to determine stock status of SA Red Snapper. The analyst has given to much weight on age in the model for a determining a Rebuilt Red Snapper stock. It's time to weigh abundance more than age in the model.</p> <p>3, I support all of the FWC EFP hot spot, study fleet and non-hotspot projects off NE FL. The goals of this project are to test management strategies in the center of abundance of the SA red snapper fishery that may reduce red snapper discards and for other snapper grouper species also ensure opportunities for sustainable harvest.</p> <p>4, Amendment 36 Gag and Black grouper vessel limits and on demand gear for black sea Bass pots. Gag Grouper are currently considered overfished so effort and harvest reductions will need to be made until the stock recovers. I support your SG AP recommendations for per day vessel limit aggregates for the Private recreational anglers. However, this will not work for Head Boats and some other type of limit is needed for multi passenger head boats. Again, I would defer to your SG AP for recommendations</p> <p>5, Amendment 36, BSB pots are currently an approved gear type in the SA SG fishery. There are very few active Commercial fisherman using the gear. I use the gear in the winter months, and it had been an important part of my portfolio of fisheries in the SA for many years. This vertical line gear has lots of regulations and guidelines already in place. These regulations have been successful in allowing the gear to be fished in depths greater than 90 feet year-round and fished in-shore when seasonally closed areas are open. I hope that with rope-less gear we can fish year-round in all areas.</p> <p>Recently I and other fisherman have been involved with the EFP on developing rope- less BSB pot gear solutions in an effort to remove BSB Pot vertical lines from the water column until retrieved. This EFP work has been very successful, and I have found an on-demand rope stored at depth gear type that works for me. So far it has been flawless but there are still many ideas and options to be developed for on-demand gear type improvements. Fisherman being able to continue using the gear is vital to further development of rope-less gear. This will have conservation benefits for marine mammals in other fisheries in every region.</p> <p>ACTION. Add rope-less gear to the CURRENT LINES AND BUOY REGULATIONS FOR BSB POT GEAR. Revise transit stowage requirements for black sea bass pots with on- demand gear. I recommend requiring storage of buoys inside of pots and an un-baited pot in transit through MPA/SMZ and seasonal closed areas. If I had to remove buoys and put attachment/detachment hardware on the main vertical line this could potentially foul/hang up in the vertical line storage loop upon retrieval release from pot. The current regulation of rope inside and un-baited is what I recommend for transit stowage.</p> <p>Finally many of our S/G stocks like BSB are in crisis because of the enormous, immense and overpowering RED SNAPPER population with its massive recruitment numbers of Young of year animals. BSB young of year have no chance of survival at the competent stage of life. Please fix the failed Red Snapper science and stock determination. Open Red Snapper for Harvest and take the pressure off our other less abundant S/G species.</p> <p>6, Amendment 56 BSB management options, If you want to perhaps rebuild the BSB stock you must open the red Snapper fishery. The limited BSB recruitment at the competent YOY stage of life are being eaten by the overwhelming abundance of Red Snapper YOY at that critical stage. We all know the massive overwhelming abundance level of mature Red Snapper. Now imagine the enormous abundance of Red Snapper at the YOY stage of life. Our reef fish ecosystem has suffered and continues to suffer from failed Red Snapper science and Management.</p> <p>7. Private recreational permit and educational requirement.</p> <p>I support the council on actions to require a private recreational permit. This could improve estimates of catch and effort from the private recreational component of the snapper grouper fishery, A private recreational permit could better identify the universe of participants in the snapper grouper fishery which is much needed and way overdue. The education requirement is also needed and has already been started with voluntary outreach and citizen science projects. Now it's time for education to be a requirement to participate in our SG fisheries.</p> <p>Thank You Jimmy Hull Ponce Inlet fl.</p>
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3/4/2024	First Name: louis Last Name: metzman Email: louis.metzman@gmail.com	City: Key Largo State: Florida	Private Recreational	<p>I wish to state my unhappiness with the way the golden tilefish situation is handled. Golden tiles are wonderful and unique fish, and I agree we must manage them well if we want them around for future generations.</p> <p>Last year the season lasted much longer, till July 17, and since in South Florida the golden tiles are often fished with the bluelines and snowy grouper most anglers wait till May 1 to deep drop (fishing method for these species). Last year the season ran 187 days; this year we get 6 days warning that it is closing after 59 days. I feel like we recreational anglers don't really matter to the managers of this fishery. How can it be appropriate to have one year's season more than three times as long as the next year's season? The logical assumption, excepting some natural disaster, is that either it was mismanaged last year and the season was way too long, or that it is being mismanaged now. I hope you can provide an explanation so I am not worried that this species is not being managed well. Is there not a mandate to protect recreational fishing, or is the commercial catch the sole priority?</p> <p>Personally, I now won't get any chance to fish the goldens this year and any bycatch of goldens in May will be lucky to survive the trauma. I love these fish, and will do my best to decompress and descend them, but I have my doubts, because I'm sure embolisation must be very traumatic to them. A swordfish can come up from the deep little worse for the wear; I don't feel it's the same for tilefish. And, honestly, many people are not able to decompress and descend in a timely fashion. I won't target them, but they live and feed around the other species I can fish for starting May 1.</p> <p>The commercial allocation appears to be nearly 1 million lb/ year, and increasing annually. (I am not a sophisticated reader of the federal register, so please correct me if I am wrong here). The appearance is that recreational anglers are clearly not a priority, but more of an afterthought. The recreational catch, though quantified by numbers of fish and not pounds, appears to be the equivalent of a rounding error in the commercial catch. The hope would be that the fishery is managed for the benefit of both groups, and that would be my expectation of the mandate of NOAA Fisheries.</p> <p>It is strange we do not start the golden season concurrently with the blueline tile and grouper season. It isn't realistic or environmentally sound to expect people to burn the gas for a 40 to 60 mile round trip when the only target species legal to retain is golden tile, and the other fish likely to be caught have a nonconcurrent season. The same thing applies when the season for the other species opens. There will be much waste as this situation will cause a fair amount of bycatch that won't survive. In addition, if it is not realistic to fish for the deep water species mentioned (due to ethical concerns - killing by catch, and logistical concerns - very long boat trip), then it adds to the angling pressure on other species. I question whether this situation is well thought out or ethical. I am flabbergasted, actually.</p> <p>I am deeply puzzled by the management of the recreational catch for this species.</p> <p>I suggest two things:</p> <ol style="list-style-type: none"> 1) Allocating more fish to recreational anglers. This species shouldn't be fished commercially at all if recreational anglers don't get a realistic opportunity at all, which is currently the case in south Florida. I question the prioritization of commercial over recreational. 2) Run the recreational seasons for goldens, bluelines, and snowy grouper concurrently, and start May 1.
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3/6/2024	<p>First Name: Andrew Last Name: Mahoney Email: Mahoneydrew@yahoo.com</p>	<p>City: Bluffton State: South Carolina</p>	<p>Commercial, Wholesale/Dealer /Retail</p>	<p>Relative to amendment 8 when council addresses the overview of commercial snapper/grouper permits. The initial aim of the objectives for amendment 8 where there were 8 bullet points indicating the intentions of the objectives in this amendment. There's indication that many of these intentions of the objectives were not met.</p> <p>-Prevent Overfishing: I think we can all agree that in present time amendment 8 did not prevent overfishing as we still experience species that are undergoing overfishing.</p> <p>-Promote a mechanism to vest Participants: Probably the closest to hitting it's objective in the case for market owners and pack houses operating during the time of amendment 8, as it gave them the opportunity to buy out the other harvesters in their areas resulting in the ability to pack house owners to multiply their quotas, though it negatively impacted the majority of fisherman the market owners really benefit from the harvesters struggles. It restricts entry and limits the opportunities for new participants to become vested in the fishery and hinders the goal of encouraging participation and investment in the long-term sustainability of the snapper/grouper fishery.</p> <p>-Create market driven harvest pace: This objective could've been met introducing additional participants in underutilized areas, such as Southern South Carolina, who could of contributed to a more balanced and responsive supply. A dynamic influx of new entries fosters competition which when managed effectively can help establish a sustainable and market-driven approach to harvesting.</p> <p>-Minimize Gear and area conflicts: A moratorium in general halts fishing activity without addressing the underlying issues causing conflicts. A more effective strategy would involve implementing regulations or incentives that encourage responsible gear use and allocation of fishing areas, that would've fostered a long-term harmony among harvesters.</p> <p>-Decrease Incentive for overcapitalization: All the 2 for 1 did for the first decade was encourage current market and pack house owners during amendment 8s inception who are harvesting areas that were undergoing overfishing to invest heavily in obtaining extra permits that were made for sale and exploiting the quotas, which led to excessive fishing effort and strain on fisheries resources. And it promoted disproportionate investments without adequate consideration for sustainability and resource management.</p> <p>-Prevent continual dissipation of returns: It resulted in excessive fishing efforts in places like Morehead City NC, which was mentioned in the March 2024 discussion document under recent snapper/grouper ap discussions page 2 "In Morehead City NC one member commented that stocks aren't healthy and a particular decline in groupers, the very next sentence in Morehead City, NC there has been new and younger participants. Now you have seen a decline in stock and an increase in participation which is outpacing the local fishery's sustainable limits.</p> <p>-Evaluate and minimize local depletion: Led to intensified fishing efforts in specific localities, exceeding the ecological capacity of those areas. Because the amendment didn't have effective mechanisms to regulate and balance harvesting effort and inadvertently contributed to local depletion of fish stocks, which has compromised the ecological balance and long-term viability of those specific areas.</p> <p>Ok, that's all 8 intentions of the objectives in amendment 8 and not one of them has hit the target.</p> <p>Therefore amendment 8 does not implement the best available science by excluding out vessels access without stability, when the healthy stocks don't have the harvesters to fulfill the ACLs.</p> <p>I'd like to address these three young men that are missing out of Brunswick. -Caled Wilkerson -Dalton Conway -and Tyler Barlow</p> <p>I'm trying to think about the most respectful way to address this. I don't actually know these young men, but their vessel was identical to mine, they were traveling long distances to the fishing grounds as I do, they were inexperienced as I and all harvesters were in their first few years. With the exception of brunswick having more working waterfront then beaufort county the similarities are evident. Therefore, the current search for them hits very close to home for me and I am sure I understand as much as anybody listening right now what they were going through in the moments that sealed their fate.</p> <p>There's evidence that these young men were in the end victims of poor management strategies resulting improper protection for new entries directly associated with self serving permit management strategies by the council and AP.</p> <p>Here's the characteristics of this situation, you've got a vessel setup for harvesting off of cape canaveral(typically fishing a few miles offshore) attached to a permit that's sold to a new owner in brunswick where the fishing grounds are at the least 50 miles and trips are a minimum of 4 days, then allowing these young men to operate it without any safety education or protection for those involved.</p> <p>The weight of the entire operation was on the back of this young man at the helm. He was forced to learn about being an efficient captain while trying to maintain production in order to justify the inflated amount paid by the new permit holder and the permitting structure's forced time constraint on profitable production.</p> <p>I personally experienced the same hard road that these young men were on in my first few years of harvesting. So much so that I reached out to the council over it. I in fact warned the council members of the obstacles and dangers that I was experiencing as a new entry in an email in 2020, and for the most part was ignored.</p> <p>I've got a privacy violation that NOAA has indicated the council is accountable for, dealing with the sharing of vessel logbook information with the permit holders that lease their permits. Sharing landings is one thing, but when vessels are selected for an economic survey, which involves filling out trip expenses at the bottom section of each logbook report, permit owners leasing their permits have access to the leaser's vessel expenses. The sharing of this information to permit holders charging annually for access for leaser's vessels is logically inconsistent. Not only is this a blatant privacy violation without consent but it absolutely contradicts any attempt to promote stability in amendment 8's objectives. I ask that council members come up with a fair solution for this privacy violation.</p> <p>I've talked to a few council members about this, the lack of compliance with Magnusson Stevens is evident. The lease option that's been identified as a means of new entry to the commercial fishery by the SAFMC isn't even supported by the magnusson stevens act nor NOAA which is the reason the council is responsible for these privacy violations without consent. Some members might say that consent was given when agreeing on the lease, but they are uninformed, as new leasers are not made aware of this until the vessel is selected for the economic survey. In addition, consent to share economic data from vessel owners cannot be made on an agreement to lease a permit. as it is not supported by the amendments outlined by the Magnusson Stevens Act</p>
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3/25/2024	First Name: Bob Last Name: Laney Email: Flatsslabob@gmail.com	City: Port Orange State: Florida	Private Recreational	Why are head boats under the same rules as personal boats,, it seems unfair that they have to abide by regulations that govern fish amounts? I think it's something that should be considered! It's unrealistic to expect a business owner to be burdened with laws meant for smaller boats!
3/25/2024	First Name: Robert Last Name: Smith Email: Rsmithsportfishing@gmail.com	City: Chesapeake State: Virginia	Private Recreational, For-Hire	Please keep grouper and snapper fishing sustainable
3/25/2024	First Name: Cliff Last Name: Morey Email: Knockitdowntexturing@gmail.com	City: Deland State: Florida	Private Recreational, For-Hire	Bring our snapper fishing back, they are so abundant, you can't fish without catching them!
3/25/2024	First Name: Gaston Last Name: Davis Email: davismarineandautomotive@gmail.com	City: Newport State: North Carolina	Other	Please recognize that headboats should have seperate regulations compared to the smaller sport fishing vessels that can only carry about 6 people.
3/25/2024	First Name: Melissa Last Name: Leone Email: Melissaleone313@gmail.com	City: Port Orange State: Florida	Private Recreational, Commercial, For-Hire, Wholesale/Dealer/Retail	South Atlantic headboats need a separate set of bag limits for multi passenger vessels. To be fair, the limits for 6pack vessels should be multiplied as nessecart to the equivalent number of people on a head boat. Example: Sea Spirit can carry a lil more than 66 people so 66(headboat passengers) divided by 6(OUVP vessel limit) equals 11, so the head boat limit should be 11 times the 6-pack limits. That would reflect for the all the people fishing not all the boats fishing.
3/25/2024	First Name: Jason Last Name: Lundell Email: Jasonlundell@me.com	City: Ormond Beach State: Florida	Private Recreational	I would challenge any of you to go offshore out of Ponce Inlet bottom fish and not catch Red Snapper. I went last weekend and that was all we could catch and it didn't matter where we were. More of them are dying from being hooked and sharked than taking one home. I have lived here all my life and never seen it this bad. The cost to have a boat pay for gas and bait to go offshore is bad enough but to keep us from keeping something for our efforts is just wrong. Last year we had 2 days and that's a problem in its self. Every body who has a boat goes out and tries to catch them which makes it terribly unsafe and I would say hurts the species more. Furthermore your closure of gag grouper is over the tip. I have specifically targeted them for years and I think k I may have harvested 2. These are not overfishing because they are smart and you have to work hard for them. I hope you will rellok at both of these closures. You want to make a difference close the commercial sector but you won't do that because you get paid taxes in the sale amd re buy from markets. Let's not confuse this it's all about money and I for one am saddened that is the world we live in
3/25/2024	First Name: David Last Name: Fray Email: Fraydavid@live.com	City: Waldorf State: Maryland	Private Recreational	Headboat rec fishing should not change! Should be no changes on how many groupers allow on a headboat.....
3/25/2024	First Name: Darlene Last Name: Lavoie Email: rpr2@mindspring.com	City: Stamping Ground State: Kentucky	Private Recreational, Commercial	Please recognize headboats regulations and limits separately moving forward. Thank you!
3/25/2024	First Name: Sandra Last Name: Rearden Email: sandragale1960@hotmail.com	City: Raleigh State: North Carolina	Other	It doesn't seem fair that a headboat with many people fishing would have the same catch limit as a recreational boat would! People travel some far to fish on a headboat to be able to catch fresh fish to feed their families. Even more disappointing to not be able to keep the fish because the small catch limit has already been met!
3/25/2024	First Name: William Last Name: Sell Email: W.sell@aol.com	City: Debarry State: Florida	Private Recreational	For the love of god please try opening up snapper for 3 weeks or use a tag system. The 2-3 day season is dangerous!!
3/25/2024	First Name: Eliza Last Name: Den Email: Lilbitathis@yahoo.com	City: Jacksonville State: Florida	Commercial, Other	Please recognize headboat regulations and vessel limits separately going forward. A larger charter should not have the same limits as a small private boat/charter. Thank you.
3/25/2024	First Name: Colleen Last Name: Maxwell Email: gatorrxuff@gmail.com	City: Orange City State: Florida	Private Recreational, Other	Please make fishing fun again! I've been fishing on the Sea Spirit out of Ponce Inlet for the last 3 years. It's getting frustrating fishing anymore. Everything I catch that the sharks don't eat as I'm bringing them up is the infamous red snapper. I'm tired of fishing for something I can't bring home to eat. Any time I get a Mangrove snapper on, I have to try to reel as fast as I can so the sharks don't take it. Lately, I've been coming home with no fish for dinner. I spend \$140 every trip, not including my lunch and water that I pack for the day. Now, I am in competition to be one of the first for a Cobia or Grouper because of the new restrictions. I don't get it. Why are the restrictions so ridiculous? You say the red snapper is still endangered? That is a lie! That is all I've been catching. Please, please reconsider your restrictions. I just want to have fish dinner that I can catch myself.
3/25/2024	First Name: Last Name: Email:	City: State: North Carolina	Private Recreational	Per vessel catch limits for Head Boats / Party Boats / Drift boats would be very detrimental to local economies and small businesses. The concept is unfair and discriminates against the less affluent fishermen. It would be similar to putting per day limits on total catch for fishing piers.
3/26/2024	First Name: Keith Last Name: Lavoie Email:	City: State: Kentucky	Private Recreational, Commercial, For-Hire, Wholesale/Dealer/Retail, Non-Govt Org (NGO)	Recognize headboats regulations and limits separately moving forward.

