

From: [MARK MCWATERS](#)
To: [John Carmichael](#); [Mike Schmidtke](#); [John Hadley](#)
Subject: SAFMC Amendment 35 and 46
Date: Sunday, February 19, 2023 3:10:32 PM

Gentlemen,

After reviewing the online presentations on Amendments 35 & 36, I wish to share my comments for your consideration. The online comment portal has closed but hope you will review this feedback.

As background, I am a lifelong resident of Florida and have fished offshore for over 54 years. I have a modest 21-foot center console boat and believe I represent the majority of recreational fisherman. Bottom fishing has always been a passion and I fully support resource conservation and reasonable data-based regulations that support both recreational and commercial fisheries. I believe the vast majority of recreational fishermen agree that fair and reasonable conservation measures are a good thing. The redfish net ban, the management of white-tailed deer and turkeys, the red snapper in the Gulf of Mexico are a few real-world examples of recreational harvesting that is sustainable / growing when accurately managed.

Amendment 35

Thank you for posting Mike Schmidtke's January 2023 presentation on you-tube. It was very helpful to better understand the info being presented. The red snapper population by age over the last 40 years slide #4 is a great slide. It is good to see the high abundance of snapper over the last 5 years on the chart. No doubt we are seeing more red snapper than ever before. It is also noteworthy the 1980's population crash was driven by commercial overfishing and not the recreational sector. From my view, the major issue with Amendment 35 is it states that ~90% of the red snapper caught by recreational fishermen are dead release / discards. Slides 5, 6, & 7 indicated the population can withstand 230K removals but 202K will be dead release!?! This is completely false. Recreational release mortality is nowhere near this number and 90% is impossible to believe. My own experience over many years is with the use of circle hooks and venting fish, the dead release was less than 5%.

Since I started using a Seaqualizer descending device instead of venting, the dead release is less than 1%:

- * 90% are hooked through the jaw, resulting in negligible injury to the fish when using the decending device
- * 9% are hooked through the body (aka foul hooked) and again no significant damage when released
- * 1% swallow the hook deep and the line is typically cut.

My observation of other boats fishing nearby is similar. It is pretty easy to see what others are pulling up and if fish experiencing barotrauma are floating away. The worst I have seen is < 10% dead release.

I strongly request you revisit the method and data on determining actual recreational

dead release / discards.

In addition to the regulations requiring a descending device, I also encourage SAMFC and NOAA to focus on additional steps to promote the use of descending devices. The Seaqualizer works great for me. I have it rigged and ready to go on a old rod & reel (what fisherman doesn't have one). Maybe offer a fishing license / permit discount with proof of purchase of a descending device? How about working with local bait and tackle shops to subsidize the cost of one and promote the use of them? Maybe an expanded season or catch limit if you have and use one? I think you will have better buy-in from both the recreational and commercial folks if there is evidence the limits can be opened up a bit with the use of circle hooks, descending devices, etc.

Amendment 46

A permit is acceptable to me if it truly leads to accurate data and reasonable management regulations for both recreational and commercial fisheries. My perspective in response to the specific questions posed in the January 2023 Amendment 46 power-point slides:

- * Issue permit to vessel or individual angler? My vote would be to each vessel to keep the reporting as consistent as possible and minimize duplications / omissions. The vessel captain / boat owner would be ultimately responsible.
- * What species should be covered? I understand the desire for all the various reef fish / snapper / grouper complex fish data to be reported. But suggest you start out with just a few key species (red snapper, gag grouper, black grouper). This will help recreational captains become accustomed to the process of reporting the catches without being overwhelmed with every single seabass, beeliner, porgy, etc.
- * Education component? Sure public education on use of descending devices, circle hooks, etc is good but you must have buy-in from the public this can lead to more reasonable recreational limits and seasons.

The questions I have not covered in the presentation are:

- 1) Exactly how does the permit enable improved data gathering?
- 2) What is the specific process you intend for the recreational angler to use to report data? Keep a manual logbook and download the data to website within 24 hours of fishing day?
- 3) Are you going to require the recreational fisherman to purchase software and electronic reporting equipment that can cost tens of thousands of dollars? I believe this is required for commercial and / or for-hire charter captains, but would be a show stopper for recreational fishermen.
- 4) How much data are you going to require for every fish landed? Again starting with a few key items rather than 30 attributes for every single fish hooked will likely provide better data at the end of the day.

Thank you for your consideration.

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