*Submitted March 16, 2016:*

**Framework for The Future of SA Fisheries:**

Experience in Fisheries Management:

1. Fisheries independent data monitoring workshop participant
2. SGAP member and past chairman
3. SEDAR participant
4. ORCS workshop participant
5. Dolphin Wahoo AP
6. Electronic monitoring workshop participant

After numerous SEDAR’s including 17, 24 and 41 for Red Snapper it is apparent what we are doing is not working.

The inability to collect data and accurately assess stocks especially those that are closed is an ongoing problem.

The inability of MRIP to accurately capture effort and discards for the recreational sector is an issue that will never be resolved under the current management plan. My proposal may seem extreme but what we are doing isn’t working.

**Step 1**) - **South FL needs to be its own management area**: The fisheries habitat and species of concern are vastly different than the rest of the SA. On the Atlantic side, from Jupiter to the Gulf, to Ft. Myers should have its own management plan. Commercial and for-hire fisherman in this region would change their federal permit from SA to SF (South FL). ***This also takes care of permit problems****.*

**Step 2) - Limited entry for the for-hire sector**: **SGAP recommendation**: ***Unanimously*** supported by all members. With electronic reporting becoming a reality this sector will be monitored and managed effectively. This sector needs to be removed from MRIP.

**Step 3)** - **Sector separation:** With the different needs and goals of each sector this makes sense. Allocation could be based on landings and participation. This would allow Charter operators to determine how to manage their ACLs.

**Step 4) -** **Federal Reef fish stamp** - **SGAP recommendation**: We must identify which salt water anglers are fishing or intend to fish for reef fish.

**Step 4a) - Federal deep water complex stamp**: **SGAP recommendation**: We must identify which salt water anglers are fishing or intend to fish for deep water species.

**Step 5) -** **Federal recreational reef fish season**: This is tough; but, what we are doing is ***not******working***. A season would allow (in addition to the changes listed above) much better coverage and monitoring of recreational effort. The result would give the managers the ability to turn some of the dead discard numbers into landings. It would seem this is a no brainer. I believe recreational anglers would support this if the benefits were explained.

After sitting through SEDAR 41 at all stages (DW workshop through RW) it is apparent some of the assessment issues are unresolvable under the current framework. People do their best at all stages but the end result is a product that very few have confidence in. The above suggestions, while not perfect, would put us on a better path making sure we have re-built *sustainable* fisheries for the future.

Sincerely

Captain Robert Johnson

Owner/Operator Federally Permitted For-Hire and Commercial Vessels: 1980 Present

*For submission April 9, 2018*

**Progress Toward the Future?**

Step 1: - **South FL management area**: In addition to the fisheries habitat and species of concern in South FL, there is another reason for a different management approach in that region - State regulations vs. Federal regulations. These differences continue to plague federally permitted south FL fishermen. It’s been pointed out in public comment that a significant number of south FL charter boats continue to operate without a federal permit that is a nominal $25 license fee. This is done under the guise they operate in state waters. Thus, taking advantage of whatever regulation works in their favor. An example would be recreational Amberjack closure in federal waters in 2017 and the closure of the Porgy complex. Warsaw Grouper, closed in Federal waters for greater than 5 years, are still open in state waters. How do we know these boats are not going beyond the 3-mile limit? The facts are, no one knows for certain – no accountability. This puts federally permitted charter boats at a disadvantage which *WILL* force them to decide, *do* *we obey* *the* *law* **OR** operate illegally like the competition ‘charter’ boat right next to them at the marina dock?

Step 2: - **Limited entry for the for-hire sector**: Council refuses to take limited entry out for public comment. Legally permitted federal charter boats are overwhelmingly in favor of limited entry. It has been pointed out, without accurately identifying this user group, any data provided by electronic reporting will be inadequate at best and most likely un-useable for stock assessments. What IS the purpose?

Step 3: - **Sector Separation**: We continue to try to separate for-hire from recreational anglers. The electronic reporting amendment is a prime example. It’s very simple – either we are separate or we’re not.

Step 4: - **Federal Recreational Reef Fish Stamp:** Why are we still talking about this?? Everyone agrees this is needed BUT, we’ve been talking about it for eight(!) years! This applies to the deep-water complex as well.

Step 5: **- Recreational Reef fish season**: We have no way or plan to ***accurately*** account for recreational effort, landings, and discards. A six-day red snapper season is not acceptable, *but* is what we get for not addressing the #1 issue. Recreational fisherman must become accountable otherwise this group will destroy what’s left of federally permitted charter boats in the South Atlantic.

In closing, I’ve always been a strong supporter of fisheries management and supported the for-hire electronic reporting amendment; however, if other measures are not put into place, for example, limited entry/sector separation, then I will withdraw my support of electronic reporting.