

From: [SAFMC Administrator](#)
To: [Myra Brouwer](#)
Subject: FW: Reef Fish Amendment 60
Date: Wednesday, February 18, 2026 11:54:18 AM

From: Ben Hartig <mackattackben@att.net>
Sent: Wednesday, February 18, 2026 11:39 AM
To: SAFMC Administrator <administrator@safmc.net>
Subject: Reef Fish Amendment 60

As a commercial fisherman and past member of the SAFMC I fully support the elimination of the 2 for one permit transfer requirement in amendment 60. I agree with the council's decision that the time has come to allow transfer of permits on a one to one basis. Based on the fact that the major commercial reef fish fisheries, vermilion snapper in the north and yellowtail snapper in the south are relatively stable and mostly w/o closures indicates that current effort as defined by the number of permits is sustainable and the need to further limit the number of permits is no longer needed. It is my hope that this change will make it easier for new fishermen to be able to find a permit more easily as the current system has made it difficult to even find 2 permits to transfer into one. It will also eliminate the "corporate permit loophole" that has been a fairness issue as if you were incorporated when you first received the permit it could be transferred with the business as a single permit. This also delayed the effort reduction the council was trying to achieve under this regulation.

Trip Limit Considerations: I appreciate the council's effort to try and attain optimum yield in its commercial fisheries by considering different trip limit options. While trip limits and split seasons have been effective at keeping certain fisheries open for as long as possible in a given season they also introduce inefficiencies in some cases as a reef fish trip off south Florida is substantially different than one leaving out of North or South Carolina. I would suggest some caution as you consider different options as you really need to know what is driving the ability to land a quota under a specific set of trip limits. For instance, when the council first implemented trip limits in vermilion snapper fishery there was a "turn and burn" fleet mentality where the fleet would unload a trip and get back out as fast as possible until the quota was landed and the season still closed early. Over time this has changed as the season now remains open all year. So my concern is what changed? Are the fish harder to catch due to stock size or have fishermen changed their "turn and burn mentality" and are now targeting multiple species and extending any given trip. It is important to know what the drivers are before you increase a trip limit in a declining fishery. I will take this opportunity to mention that you need SAFE reports to help in your decision making as you can discern trends in fleet dynamics and landings that are important considerations. They are even more important in the current management climate where both science and monitoring are declining under the current administration. While staff time is at a premium I continue to believe that it is worth dedicating staff effort to develop this critically important information.