

Summary of comments received on the DEIS for Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region (Amendment 37)

The National Marine Fisheries Service (NMFS) received a total of 40 comments from 38 individuals and two federal agencies during the 45-day comment period for the draft environmental impact statement (DEIS) for Amendment 37. There was general opposition from the individuals to the vast number of actions in the amendment. Most of the comments from the individuals opposed the management measures for minimum size limits, commercial trip limits, recreational bag limits, and a partial closure of the recreational fishing season for the Florida Keys/East Florida (FLK/EFL) stock of hogfish. A few comments were in favor of the actions in this amendment in order to rebuild the overfished stock.

Action 1. Modify the fishery management unit for hogfish

The Environmental Protection Agency (EPA) commented that it was unclear whether the DEIS's scope appropriately addressed the connected action of the preferred alternative and the need for the Gulf of Mexico Fishery Management Council to remove a portion of its jurisdiction over the Florida Keys hogfish stock. Connected actions are expected to be discussed within the same impact statement whether it is within this environmental impact statement or a future National Environmental Policy Act (NEPA) review pursuant to the Council on Environmental Quality's NEPA regulations.

One individual supported the current preferred alternatives for this action. There were no comments opposing this action.

Action 2. Specify maximum sustainable yield (MSY) for the Georgia through North Carolina (GA-NC) and the Florida Keys/East Florida (FLK/EFL) stocks of hogfish

The EPA commented that it was unclear whether the DEIS's scope appropriately addresses the connected action of a future MSY determination based on future available scientific information [i.e., a suitable GA-NC stock assessment], with future management actions requiring some form of NEPA review.

No other comments were received on this action.

Action 3. Specify minimum stock Size threshold (MSST) for the GA-NC and the FLK/EFL stocks of hogfish

No comments were received on this action.

Action 4. Establish annual catch limits (ACL) for the GA-NC stock of hogfish

One individual commented that the only reliable catch stocks method to calculate the ACL for GA-NC stock of hogfish was derived from Marine Recreational Information Program which only accounted for hook-and-line anglers. There is an inherent lack of knowledge for the number of hogfish taken by divers, even though divers harvest most of the hogfish in the GA-NC area.

Therefore, Amendment 37 should estimate the number of hogfish harvested by divers before making a final determination of the ACL for the GA-NC stock of hogfish.

Action 5. Establish a rebuilding plan for the FLK/EFL stock of hogfish

The Department of Interior (DOI) expressed support for the actions to address the overfishing and rebuild the hogfish stock in the FLK/EFL area.

Some individuals supported this action commenting that they have noticed a 50% decline in the numbers of hogfish in the Florida Keys and hogfish need protection. One commenter stated that they have been diving off Fort Pierce to Port Canaveral since 1982 and have seen only a handful of hogfish, and they were almost all juveniles.

Action 6. Establish ACLs for the FLK/EFL stock of hogfish

No comments were received on this action.

Action 7. Establish a recreational annual catch target (ACT) for the GA-NC and the FLK/EFL stocks of hogfish

The EPA commented that it was unclear whether the DEIS's scope appropriately addressed the connected action of the proposed recreational ACTs in this action with any future decision to use them, which was outside the scope of this action. It was unclear whether accountability measures (AM) will be developed in a future action to implement the ACTs in order to prevent the ACL from being exceeded. It appeared the ACTs adopted now could potentially impact later actions that may realize a NEPA-connected action.

No other comments were received on this action.

Action 8. Increase the commercial and recreational minimum size limit for the GA-NC and the FLK/EFL stocks of hogfish

The DOI supported increasing the minimum size limit for the FLK/EFL stock of hogfish to 16 inches fork length (FL) and said that the current minimum size of 12 inches FL is insufficient to rebuild hogfish populations and achieve recovery of the stock. Additionally, their fishery-independent surveys at Biscayne National Park (BNP) showed that most observed hogfish were undersized and the fishery-dependent data from the recreational fishery showed that the average size of landed hogfish was just above legal size. The DOI also recommended gradually increasing the minimum size limit over two years. Some of the comments received from the public regarding this action supported the findings and recommendations of the DOI.

Many individuals supported increasing the minimum size limit but not to 16 inches FL. They stated that it would increase the number of discards. They supported increasing the minimum size limit to 13, 14, or 15 inches FL. Most of the commenters preferred a minimum size limit of 14 inches FL for the FLK/EFL stock of hogfish.

One commenter preferred a minimum size limit of 14 inches FL for the GA-NC stock of hogfish.

Action 9. Establish a commercial trip limit for the GA-NC and the FLK/EFL stocks of hogfish

Many individuals were opposed to the preferred commercial trip limit of 25 pounds whole weight (lbs ww) for the FLK/EFL stock of hogfish. They recommend a commercial trip limit of 100 lbs ww. A commercial trip limit of 25 lbs ww would not cover the cost of the fishers to make the trip, and would impact their businesses negatively. One individual supported the 25 lbs ww commercial trip limit.

No comments were received on the preferred commercial trip limit for the GA-NC stock of hogfish.

Action 10. Modify and/or establish recreational bag limits for the GA-NC and the FLK/EFL stocks of hogfish

The DOI commented that reducing the bag limit is necessary to rebuild the FLK/EFL stock of hogfish and supported the proposed bag limit of one fish per person per day. DOI's data at BNP showed that recreational fishers were generally unable to meet the current bag limit of five per person per day and that these fish were either undersized or just over the size limit.

Many individuals commented that reducing the recreational bag limits for the FLK/EFL stock of hogfish to one fish per person per day was excessive. They preferred a recreational bag limit of three fish per person. Some wanted no reduction in the recreational bag limit.

No comments were received on the preferred recreational bag limit for the GA-NC stock of hogfish.

Action 11. Establish a recreational fishing season for the FLK/EFL stock of hogfish

The DOI supported the July through October open season because it avoided harvest during the spawning season for hogfish in the FLK/EFL area, allowed fishing for hogfish in the summer time, and was the most favorable to the fishing community.

Many individuals were opposed to the recreational fishing season in the FLK/EFL area open only for four months. Most of the commenters did not want the recreational fishing season to be closed for most of the year and some wanted to be able to fish year-round. . Some individuals recommended that hogfish be closed in the summer time and open to fishing in the winter, while others recommended the opposite.

Action 12. Establish commercial and recreational AMs for the GA-NC and the FLK/EFL stocks of hogfish

No comments were received on this action.

Comments un-related to actions in Amendment 37

Some individuals commented that hogfish are primarily most susceptible to spearfishing. Therefore, NMFS should reduce the number of hogfish available to spear or prohibit spearfishing altogether. Other individuals commented that hogfish should be closed to the commercial sector

and hogfish should only be a recreational hook-and-line fishery. NMFS should set up an aquaculture program to farm hogfish.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960
July 26, 2016

Dr. Roy E. Crabtree, PhD
Regional Administrator
Southeast Regional Office
National Marine Fisheries Service, NOAA
263 13th Avenue South,
St. Petersburg, Florida 33701-5505

SUBJECT: Draft Environmental Impact Statement (DEIS): Amendment 37 to the Fishery Management Plan (FMP) for the Snapper-Grouper Fishery of the South Atlantic Region, Modification to the Hogfish Fishery Management Unit; CEQ No. 20160135.

Dear Dr. Crabtree:

The Environmental Protection Agency (EPA) reviewed the subject document pursuant to its Clean Air Act (CAA) §309 responsibilities consistent with the National Environmental Policy Act (NEPA) §102(2)(C). The South Atlantic Fishery Management Council (the Council) and the National Marine Fisheries Service (NMFS) propose 12 actions to manage hogfish including addressing the Florida Keys/east Florida hogfish stock's *overfished* and *overfishing* status.

The EPA rates this DEIS as lack of objections (LO) per its EIS criteria (Please see: <http://www2.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>.)

The EPA defers to the NMFS and the Council's expertise in addressing the complex challenges with managing this popular fishery. However, it is unclear whether the DEIS' scope appropriately addresses what the EPA perceives as three NEPA-connected actions: 1) Action 1 preferred alternative's connectedness to the requisite Gulf of Mexico Fishery Management Council's Amendment, 2) Action 2's proposed future establishment of *maximum sustainable yield* (MSY) and the connectedness of any future regulatory action based on the MSY, and 3) Action 7's proposed *annual catch targets* (ACT) and the connectedness of any future decision to use the ACT in the future, whether such decision will require NEPA review (i.e., Amendment). These three potential actions are the basis for our enclosed comments. The EPA requests that the NMFS consider these technical comments in its development of a Final EIS. Should you have any questions, please contact Ms. Beth Walls of my staff at walls.beth@epa.gov or 404-562-8309.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris A. Militscher", is positioned above the typed name.

Christopher A. Militscher
Chief, NEPA Program Office
Resource Conservation and Restoration Division

Enclosure: EPA comments

ENCLOSURE

Amendment 37 to the Fishery Management Plan (FMP) for the Snapper-Grouper Fishery of the South Atlantic Region, Modification to the Hogfish Fishery Management Unit, Fishing Level Specifications for the Two South Atlantic Hogfish Stocks, Rebuilding Plan for the Florida Keys/East Florida Stock, and Establishment/Revision of Management Measures for Both Stocks CEQ No: 20160135.

Key or Significant Environmental Impacts

The proposed action concerns hogfish, one of 59 species managed under the Snapper Grouper FMP by the South Atlantic Fishery Management Council (the Council). It proposes to increase the commercial and recreational minimum hogfish-size limit from 12 to 16 inches for the Florida Keys/East Florida (FLK/EFL) stock and to 17 inches for the Georgia – North Carolina (GA-NC) stock. It establishes commercial trip limits for both stocks: 25 lbs. whole weight (ww) for the FLK/EFL stock and 500 lbs. ww GA-NC stock. It decreases the recreational bag limit from 5 to one (1) fish per person per day for the FLK/EFL stock and establishes a two-fish per person per day limit for the GA-NC stock. It recalculates the commercial to recreational sector allocations at 9.63 to 90.37 percent for the FLK/EFL stock and 69.13 to 30.87 percent for the GA-NC stock. It proposes a stock rebuilding plan to rebuild the FLK/EFL stock in 10 years with a 72.5% probability of rebuilding success because this stock has been determined to be overfished and undergoing overfishing. It also establishes an annual recreational fishing season from July through October for the FLK/EFL hogfish stock.

Proposed Action

The National Oceanic Atmospheric Administration (NOAA) Fisheries (also known as the National Marine Fisheries Service (NMFS)) is the federal agency responsible for the management, conservation and protection of living marine resources within federal waters. The Magnuson Fishery Conservation and Management Act (the Act) created 8 regional fishery management councils to develop fishery management plans needed to manage fishery resources. NMFS works with the eight Councils to manage fisheries.

NMFS and the Council propose 12 management actions for hogfish. The proposed Action 1 redefines the Council's single hogfish stock fishery into two stocks: the FLK/EFL stock and the GA-NC stock based on the 2014 stock assessment indicating 3 separate and distinct hogfish populations exist, each specific to a geographic area, i.e., the Florida Keys - southeast Florida (FLK/EFL stock), the Georgia – North Carolina (GA-NC stock), and the eastern Gulf of Mexico. Action 2 specifies for the FLK/EFL stock the MSY, which is the largest, long-term average catch that can be sustained from a stock under average conditions. Action 3 specifies for the FLK/EFL stock a *minimum stock size threshold* (MSST), the biomass level below which stock is considered overfished.

Action 4 establishes *annual catch limits* (ACLs) for the GA-NC stock while the proposed Action 6 establishes ACLs for the FLK/EFL stock. The Act requires the use of ACLs and *accountability measures* (AMs) to end and prevent overfishing.¹ The ACL is the level of annual catch that if met or exceeded, triggers some corrective action or AMs. AMs are management controls to prevent ACLs from being exceeded or to correct any exceedances. Action 12 establishes AMs for both hogfish stocks. Action 7 establishes a recreational ACT for both hogfish stocks at 85-percent of the ACL. For both

hogfish stocks: Action 8 increases the minimum size limit; Action 9 establishes a commercial trip limit; and Action 10 establishes (or modifies) recreational bag limits.

The Florida Fish and Wildlife Conservation Commission's 2014 hogfish stock assessment indicates the FLK/EFL hogfish stock is *overfished*, meaning its stock biomass falls below the MSST, and it is undergoing *overfishing* because the fishing mortality rate exceeds the stock's capacity to produce MSY. Since the Act requires a rebuilding plan to address the FLK/EFL stock's status, Action 5 proposes such a plan. Additionally for the FLK/EFL hogfish stock, Action 11 establishes an annual recreational fishing season, July through October.

Affected Environment

The proposed action will likely affect hog-fishermen, hogfish, and the reef environment within the Council's defined geographic area and a portion of the Gulf of Mexico Fishery Management Council (Gulf Council)'s area. Hogfish are a reef species that inhabit the discontinuous rocky bottoms, ledges, and reef habitats. Using their long, hog-like snout, hogfish root in the sediment for food including bottom-dwelling mollusks and crustaceans. Consequently, they are not commonly caught on hook and line. Instead, primarily harvested by spearfishing. Their flesh is considered to be of excellent food quality. Hogfish support a modest commercial and recreational fishery in the southeastern United States, especially in Florida, where about 70% of the U.S. commercial hogfish catch was landed during 2000–2004.

The hogfish life cycle consists of a 30-40 day planktonic larval phase after which juvenile hogfish settle in estuaries, seagrass beds, or shallow reef habitats. Hogfish are protogynous hermaphrodites: juvenile hogfish are female then mature into males at around three years in age and 14 inches in length. For the GA-NC stock, the estimated size at which half the hogfish population is male is 24 inches fork length (FL) with nearly all hogfish being male by 30 inches. For the FLK/EFL stock, the estimated size at which half of the hogfish population is male is 16 inches FL with nearly all hogfish being male by 25 inches. Each male forms a harem of 5 to 15 females. The removal of the dominant male may significantly impact harem stability and decrease hogfish reproductive potential.

Recommendations

The EPA appreciates the significance of the NMFS and the Council's challenge in managing the hogfishery from being overfished particularly in light of this fish's popularity for sport fishing and consumption. The hogfish's protogynous hermaphrodite biology and the discontinuous nature of its habitat can make it difficult to determine and ensure a sufficient female population matures to reproductive age and subsequently matures into males. Further compounding this challenge is the need for sufficient data to accurately estimate existing hogfish stock levels, determine when stocks have reached maximum sustainable levels, and identify when a stock is no longer overfished or undergoing overfishing. We defer to the NOAA and the Council's expertise in these matters. From the documents provided, the EPA was unable to determine whether NMFS had considered the issues raised below.

Recommendation #1 –

For Action 1, it is unclear whether the DEIS's scope appropriately addresses the connected action of the preferred alternative and the need for the Gulf Council to remove a portion of its jurisdiction over the Florida Keys hogfish stock. Connected actions are expected to be discussed within the same impact statement whether it is within this EIS or a future NEPA review pursuant to the Council on

Environmental Quality (CEQ)'s NEPA regulations.² According to the DEIS, *[u]nder Preferred Sub-alternative ... the Florida Keys would be managed exclusively by the South Atlantic Council. However, the Gulf Council will need to remove the portion of hogfish in Monroe County, Florida, from [its] Reef Fish Management Unit and give management jurisdiction to the South Atlantic Council.* The above needed Gulf Council action requires a future amendment. NMFS's approval of FMPs and amendments appear to typically be considered as major federal actions triggering NEPA review. Additionally, it is unclear whether the Gulf Council will be doing the action necessary to implement this action's preferred alternative.

Recommendation #2 –

For Action 2, it is unclear whether the DEIS's scope appropriately addresses the connected action of a future MSY determination based on future available scientific information (i.e., a suitable GA – NC stock assessment), with future management actions requiring some form of NEPA review. The preferred alternative gives the Council flexibility to adopt a new (i.e., the GA – NC stock) or revise an existing (i.e., the FLK/EFL stock) MSY value to incorporate new scientific findings (e.g., future stock assessments) without preparing an additional amendment (NEPA review). It is unclear whether this proposed action is consistent with the NOAA/NMFS' environmental review process for fishery management actions pursuant to the Act and the NEPA.

Because of the unavailability of a suitable stock assessment, Actions 2 and 3 are unable to establish the MSY and the MSST for the GA – NC stock. Consequently, the preferred alternative allows the Council to adopt new MSY values to incorporate scientific findings as they become available without having to prepare an additional amendment. NMFS's approval of FMPs and amendments appear to typically be considered as major federal actions triggering NEPA review. Since the Act³ requires each FMP to include an estimate of MSY for fishery stocks and stock complexes⁴ and since fishery management actions are typically considered as NEPA *major federal actions*, it appears to EPA that a change in MSY without the appropriate NEPA review could be inconsistent with NEPA's requirements for connected actions.⁵

The Act establishes the MSY as the basis for fishery management to end and prevent overfishing.⁶ The MSY serves as the foundation for most FMP biological reference points (or benchmarks),⁷ which are the primary output of stock assessments. Fishing regulations are set to meet these benchmarks, e.g., the F_{msy} is the fishing mortality that produces the MSY and the SSB_{msy} is the amount of spawning stock biomass needed to produce the MSY. According to the DEIS, specifying the MSY establishes the platform for future management, specifically from the perspective of bounding allowable harvest levels. *In this sense, MSY may be considered to have indirect effects on fishery participants.* The MSY sets off the parameters that condition subsequent management actions, and as such, defining MSY takes special significance. An MSY level that reflects the best available information can result in lower fishing mortality values in the rebuilding plan and consequentially lower ACLs, which will likely affect fishermen targeting hogfish.

Connected actions are expected to be discussed within the same impact statement whether it is within this EIS or a future NEPA review.⁸ It would be helpful to understand why the establishment of a MSY value for the GA – NC stock based on information not available for this NEPA review would not be connected to any future regulatory action (e.g., determining overfishing or overfished status). In other words, any future hogfish-related amendment making regulatory changes based on any MSY value developed associated with this action would appear to be so connected that it should be a part of the future NEPA review. The EPA also suggests this EIS could differentiate when the adoption of new

MSY values will likely qualify for a NEPA *categorical exclusion*⁹ or will likely constitute a *major federal action* that triggers some level of NEPA review pursuant to NOAA's NEPA regulations.¹⁰

Recommendation #3:

For Action 7, it is unclear whether the DEIS's scope appropriately addresses the connected action of the proposed ACTs in this action with any future decision to use them, which is outside the scope of this action. According to the DEIS, the objective for establishing an ACT and related AMs is to prevent the ACL from being exceeded. Here, the Council chose to define ACTs without these ACTs triggering AMs because it anticipates enacted reporting improvements will reduce management uncertainty. The ACT being the level of catch set below the ACL to account for any management uncertainty.¹¹ The DEIS seems to indicate the Council may elect in the future to use ACTs to manage recreational harvest based upon this action. The DEIS states: *[s]hould the South Atlantic Council, in the future, use ACTs to manage recreational harvest, these values will already have been specified and become part of the regulations.* The DEIS does not indicate whether an amendment (or NEPA review) will be done should the decision be made to use the ACTs established in this action in the future to manage recreational harvest (e.g., when an acceptable GA-NC stock assessment is complete and improved reporting requirements do not reduce management uncertainty). It is unclear whether AMs will be developed in a future action to implement the ACTs in order to prevent the ACL from being exceeded. It appears the ACTs adopted now could potentially impact later actions that may realize a NEPA-connected action.¹²

Connected actions are expected to be discussed within the same impact statement whether it is within this EIS or a future NEPA review.¹³ It would be helpful to understand why the establishment of ACTs for both hogfish stocks in this action would not be connected to any action or decision to use ACTs or to develop ACT-specific AMs.

¹ Annual Catch Limit Monitoring Frequently Asked Questions March 2016

http://sero.nmfs.noaa.gov/sustainable_fisheries/acl_monitoring/documents/pdfs/acl_monitoring_faqs_mar16.pdf

² Agencies are to consider closely related, connected actions when determining the scope of environmental impact statements. Connected actions should be discussed within the same impact statement. Actions are connected if they: (i) automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification. 40 CFR § 1508.25.

³ 50 C.F.R. Part 600.310(b)(2)(ii).

⁴ 50 C.F.R. Part 600.310(e)(1).

⁵ 40 CFR § 1508.25.

⁶ 50 C.F.R. Part 600.310(b)(2)(ii).

⁷ Cooper, A. A Guide to Fisheries Stock Assessments: from data to recommendations. Department of Natural Resources, University of New Hampshire.

⁸ 40 CFR § 1508.25.

⁹ Establishing and Applying Categorical Exclusions under the National Environmental Policy Act (February 18, 2010) Council on Environmental Quality Memorandum to Heads of Federal Departments and Agencies.

¹⁰ 50 CFR § 700.

¹¹ Annual Catch Limit Monitoring Frequently Asked Questions March 2016

http://sero.nmfs.noaa.gov/sustainable_fisheries/acl_monitoring/documents/pdfs/acl_monitoring_faqs_mar16.pdf

¹² 40 CFR § 1508.25.

¹³ 40 CFR § 1508.25.



United States Department of the Interior

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Office of Environmental Policy and Compliance

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ER 16/0349

9041.3

August 1, 2016

Nikhil Mehta
Southeast Regional Office
NMFS, 263 13th Avenue South
St. Petersburg, FL 33701

Re: Comments and Recommendations on the Draft Environmental Impact Statement (EIS)
for Amendment 37 to FMP for Snapper-Grouper Fishery of the South Atlantic Region

Dear Ms. Meta:

The Department of the Interior (Department) has reviewed the Draft EIS for Amendment 37 to FMP for Snapper-Grouper Fishery of the South Atlantic Region which analyzes the impacts of a range of alternatives intended to evaluate: establishing a rebuilding plan for the Florida Keys/East Florida (FLK/EFL) stock to increase hogfish biomass to sustainable levels; modifying the management unit for hogfish; specifying fishing levels for the GA-NC and FLK/EFL stocks of hog fish, and modifying or establishing management measures for both stocks of hogfish. We offer the following comments.

We recommend that NOAA National Marine Fisheries Service adopt specific actions under Amendment 37 to the FMP, to address overfishing of Florida Hogfish (*Lachnolaimus maximus*) and rebuild the Florida Keys/Eastern Florida (FLK/EFL) stock. National Parks in Florida conserve coral reef habitats utilized by Hogfish during their juvenile and adult life stages. The benchmark stock assessment results indicate the FLK/EFL stock is undergoing overfishing and is overfished.

Specific Comments

For Action 8: We support increasing the minimum legal size to at least 16 inches. The current legal size of 12-inches is insufficient to rebuild Hogfish populations and achieve recovery of the stock. For example, our fishery-independent surveys at Biscayne National Park show that most observed hogfish are undersized, and the fishery-dependent data from the recreational fishery show that the average size of landed hogfish is just above legal size. In addition, we recommend

Amendment 37 to FMP for Snapper-Grouper Fishery ER -16/0349

that NOAA consider establishing a slot limit' to increase and diversify size and ages of fish in the population, and to ensure representation by both genders. Finally, NOAA may wish to consider a graduated increase over two years in the size limit, as stated in alternative 3c, to mitigate the impact on the fishing community and promote compliance.

For Action 10: We agree that reducing the bag limit is necessary to rebuild the stock and supports the proposed bag limit of one fish per person per day. Our data at Biscayne National Park (NP) show that recreational fishers are generally unable to meet the current bag limit of five per person per day, and that these fish are either undersized or just over the size limit.

For Action 11: We support the July - October open season proposed in the preferred action alternative. This period avoids harvest during the spawning season of November through June, and leaves the summer season open, which is the most favorable to the fishing community. The rebuilding process will take several years to show results. We recommend that the South Atlantic Fishery Management Council (SAFMC) adopt and implement Amendment 37 and NOAA move to rulemaking as soon as possible to conserve and restore this important reef fish in Florida.

We look forward to working with the states, NOAA, the SAFMC, and the public on issues related to the Snapper Grouper complex. We appreciate the opportunity to review and provide comments. If you have any questions, please contact Cliff McCreedy at the National Park Service, 1201 Eye Street, NW (2301), Washington, DC 20005 (202) 513-7164. I can be reached at (404) 331-4524 or via email at joyce_stanley@ios.doi.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Stanley", with a stylized flourish at the end.

Joyce Stanley, MPA
Regional Environmental Protection Specialist

cc: Christine Willis – FWS
Michael Norris - USGS
Anita Barnett – NPS
Chester McGhee – BIA
Tommy Broussard – BOEM
OEPC – WASH

PUBLIC SUBMISSION

As of: 6/22/16 1:46 PM
Received: June 22, 2016
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Posted: June 22, 2016
Tracking No. 1k0-8qcc-eh9x
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0009
Comment from Lee Starling

Submitter Information

Name: Lee Starling

General Comment

Lee Starling , com spearfisherman Key West spearing for 40 years now.

We went from reasonable rule debate at the meetings to this over the top knee jerk reaction proposal ?

I find it hard to believe that the proposal allows harvest during the period of time of most abuse.

FWCC data shows peak harvest during mini season and start of regular lobster season when we are inundated with a large amount of inexperienced harvesters resulting in a significant discard ratio .

If there were any time for a closure , mini season, would be the time period that would prevent the most impact from

harvest. The other 8 months weather and water conditions moderate fishing effort.

I have no problem finding hogfish in the areas I fish , the population is abundant and healthy , check my landings .

There is no need to raise the size limit either and my buyers prefer a 14" hog for portion control . Raising the size limit

will result in an even significantly higher discard rate which would negate any gains made by the increase.

Also hogfish in the keys are a smaller size population but have more mass in the fillets and weigh as much as a much

larger "reef" hog . Also imports will have to match the size limit and that will make hogfish scarce in restaurants or too

expensive to afford in a market .

Reduce the recreational bag limit to 3 , open all year , and retain the current 12" size.

PUBLIC SUBMISSION

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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0010
Comment from Lee Starling

Submitter Information

Name: Lee Starling

General Comment

Will have to FIRE my MATE

Lee Starling commercial spearfisherman in Key West Fl. 58 years old.

I've always been proud of being able to select the fish I harvest , so I try to be wise about my selection.

A 25 lbs trip limit is absurd , this amount is not worth pulling my boat off the dock . At 16 fork limit that is basically 6 fish .

That is one more fish than a current recreational limit. I get \$4.50 - \$5.00 a lb for hogfish . So that is \$100 before expenses ,

before fuel , oil , ice , lunch . That doesn't leave much of a profit margin.

Guess I will have to let my Mate go , since I can't afford to pay him anymore. Or for give him fish to take home for his family.

I guess the Council didn't think about the loss of the job for that person .?

There are economic ramifications beyond the impact of the individual fisherman , it has ripples that travel through the

community . From the price of fresh hogfish spiraling so high only the rich will eat it.

To less purchases of marine hardware , consumer goods , and even what is purchased at the grocery store.

Your neighborhood economy suffers since there is less money distributed throughout the community.

Or what if the Mate I had to let go has to get Government assistance to help his economic situation ?

Food stamps ? Welfare ? Unemployment ?

You pay for that assistance with your taxes . It comes out of your pocket .

This proposed 25 trip limit will affect every small business fishermen tremendously , and could be a tipping point for some.

What about multiple day trips ? 25 lbs for a 2 or 3 day trip ?

This poundage would even make day trips fruitless and fresh , local hogfish a thing of the past.

Hogfish are migratory and constantly move , so a spot can replenish quickly , overnight even. unlike a grouper spot which

replenishes less frequently.

With the additional restrictions on mutton snapper during the summer , potential closure of yellowtail .
What does it leave you

to put in the cooler ? Porgys ? At \$1.50 per lb ? So I have to harvest 3 x as much poundage to make the same money.

Another ripple , quantity over quality .

PUBLIC SUBMISSION

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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0032
Comment from Lee Starling

Submitter Information

Name: Lee Starling

General Comment

Hogfish spawn for 8 months ? That is certainly news to me. Totally false, to use skewed information to establish an unwarranted closed season does make NMFS liable to lawsuits .

Open when the least experienced and highest level of harvesters means that the very fish you seek to protect will incur the highest level of decimation to the fish population.

The logical closure would be during the summer , effort and the amount of harvesters are lower in the winter . This is a combination of weather conditions , colder water, and school being in session .

Reducing the amount of harvesters.

Harvesters in the winter also tend to be year around divers and generally have a higher level of skill and experience, resulting in more efficient harvest with less throwbacks.

Closures create "derby fishing" ,look at what has happend with our grouper opening.

4 months pass and are just to the end of the spawn but not finished, still roed up , on the full moon in May the black groupers are aggregated in groups and aggressive . Only one thing on their mind , last chance to spawn. May arrives and the commercial free divers from Miami arrive also. Regardless of the weather conditions they are going,over the next 2 weeks the black grouper populations are crushed , still full of roe.

The years majority of landings are harvested in these few weeks and the fish end up in Miami .

Why does this happen ? , becuase the "best available science" got it wrong again. By creating a season that the timing is incorrect and fish are still spawning.

Normally the groupers finish spawning and leave the aggregation sites and disperse to deeper water and the inshore patches.

This spreads them out and harvest lowers since they are not schooled up.

A Feb through the end of May closure would definitely decrease harvest of these fish when they are most susceptible and further help to replenish the stock. You don't kill a cow when it is in the last stages of having a calf , why kill a fish laden with roe in it's last month of active spawn ?

Researchers didn't get the grouper spawn correct here in the Keys and now can't figure out when hogfish spawn either , so they throw blanket measures at the issue and hope it lands on something right.

An 8 month closure based on incomplete and sloppy studies , this is not acceptable science. Thereby invalidating the current proposals as they are based on generalities, conjecture, and lacking valid data.

PUBLIC SUBMISSION

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Posted: July 06, 2016
Tracking No. 1k0-8qkz-pa1q
Comments Due: August 01, 2016
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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0031
Comment from ted walker

Submitter Information

Name: ted walker

Address:

554 numteg ct

chuluota, FL, 32766

Email: ted1walker@gmail.com

Phone: 4073049802

Fax: 32766

General Comment

Amendment 37 "Shotgun" approach to Hogfish management is the beginning of the end to recreational and commercial fishing for Hogfish in Florida.

Out for public comment is a 383 page proposed amendment to the Fishery Management Plan for Snapper Grouper Fishery in the South Atlantic Region. The amendment outlines 12 actions aimed to reduce hogfish landings by at least 84% for recreational fisherman and at least 72% for commercial fisherman. The plan also proposes actions that could close fishing for hogfish until 2027.

This looks a lot like the regulations put in place for Red Snapper. Which three years after approval became very controversial and this year the Council is rapidly working to reverse and fix that management plan as Red Snapper populations are exploding.

Of the 12 action items, four have merit and should be considered for implementation. Below are the four action items that would reduce landing by at least 70% and not close the fishery for the next 10 years.

This are listed in the desired priority.

Action 1 - Separate Florida Keys/East Florida from Georgia/North Carolina. Expand Florida Keys zone into the Gulf of Mexico.

A large majority of the hogfish landings are in Florida. It makes sense that Georgia/North Carolina

shouldn't suffer the same bag/season limits as Florida where most of the fishing occurs. This makes sense.

Action 11 - Establish a recreational fishing season for the Florida Keys/East Florida stock of hogfish
The amendment proposed a closed season from November to June. This four month season would reduce landings by 42% and reduce fishing pressure during the spawning season. This is the shortest season closure that was proposed.

Action 10 - Modify and/or establish recreational bag limits for the Georgia through North Carolina and the Florida Keys/East Florida stocks of hogfish.

Reduce bag limit from 5 fish per day to 1 fish per day. An 80% reduction in the bag limit will also lower the landings while the season is open. Considering that there will no fishing pressure during 8 months of the year, the bag limit should not be reduced. However, it may be prudent to make a small reduction to encourage people to take larger fish and not quantity of fish.

Accept a 3 fish per day bag limit.

Action 8 - Increase the commercial and recreational minimum size limit for the Georgia through North Carolina (GA-NC) and the Florida Keys/East Florida (FLK/EFL) stocks of hogfish

- Georgia through North Carolina. Increase from 12" to 17"

- o Accept a 14" size limit

- Florida Keys/East Florida. Increase from 12" to 16"

- o Accept a 14" size limit

Imposing a larger size limit will also reduce landings. Increasing from 12 to 16 inches is a 30% increase in size and excessive. Accept the 14" increase.

Please seriously consider the ramifications of approving 12 changes at once. This amendment attempts to cover all the issues with a scattered approach and accepting any long term guidelines or restrictions regarding Annual Catch Limits, Annual Catch Targets, and Accountability Measures could lead to the complete closure of this fishery. Accepting a few changes and then measuring the results would allow scientists to evaluate those changes and the impact to the fishery without having severe long term (10 year) ramifications.

Attachments

Amendment 37 Review of Hogfish Regulations

Ted Walker
554 Nutmeg Ct
Chuluota, FL 32766

South Atlantic Fishery Management Council
4055 Faber Place drive, Suite 201
North Charleston, SC 29405

RE: Amendment 37 – Hogfish regulations

Dear South Atlantic Fisheries Management Council,

I am Florida resident and private citizen who is concerned for the wellbeing of Florida fishing resources.

I agree with management of these resources. Humans are generally an opportunistic species that have dominating tendencies and not much concern for the future nor consequences of their actions. Hence, the need for laws, regulations, and enforcement of those laws with appropriate penalties. This can be seen in past fishing industries and overuse of resources.

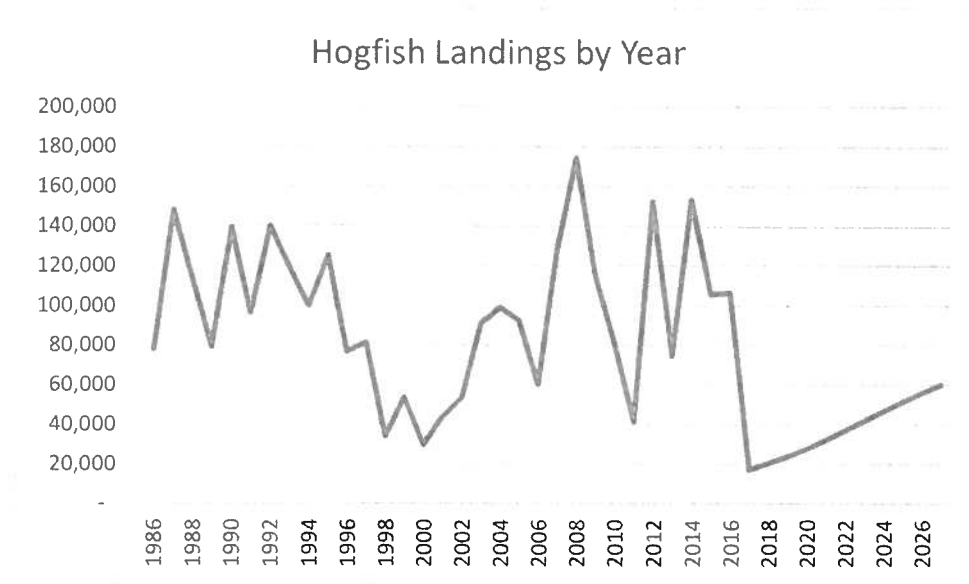
I am glad that there is a "Council" to help make decisions about the management of the resources. This would imply that not one person is deciding the fate of a resource. An organization that obtains information from multiple resources, such as, NOAA, private citizens, commercial interests, and government. Striking a balance that considers all aspects and remains open to suggestions and other perspectives is an important part of this process. You as the "council" realize that you cannot please everyone all of the time and must make decision based on facts and the best interest of the resources.

Amendment 37 "Shotgun" approach to Hogfish management is the beginning of the end to recreational and commercial fisherman in Florida

Out for public comment is a 383 page proposed amendment to the Fishery Management Plan for Snapper Grouper Fishery in the South Atlantic Region. The amendment outlines 12 actions aimed to reduce hogfish landings by at least 84% for recreational fisherman and at least 72% for commercial fisherman. The plan also proposes actions that could close fishing for hogfish until 2027.

This looks a lot like the regulations put in place for Red Snapper. Which three years after approval became very controversial and this year the Council is rapidly working to reverse and fix that management plan as Red Snapper populations are exploding.

Below is a chart of the hogfish landings since 1986 along with the proposed targeted catch limits (2017 - 2027). While there was a dip in landings between 1996-2002, the reported landings have been steadily increasing since that time. Despite this track record, the hogfish is classified as overfished and overfishing is occurring today and these stifling regulations are about to become law.



While the regulations should be tightened up to ensure the long term viability of this fishery. These regulations will put a strangle hold on fisherman and create another round of public criticism of the decisions that the SAFMC is making about the Florida fishery.

Of the 12 action items, four have merit and should be considered for implementation. Below are the four action items that would reduce landing by at least 70% and not close the fishery for the next 10 years. This are listed in the desired priority.

Action 1 – Separate Florida Keys/East Florida from Georgia/North Carolina. Expand Florida Keys zone into the Gulf of Mexico.

A large majority of the hogfish landings are in Florida. It makes sense that Georgia/North Carolina shouldn't suffer the same bag/season limits as Florida where most of the fishing occurs. This makes sense.

Action 11 - Establish a recreational fishing season for the Florida Keys/East Florida stock of hogfish

The amendment proposed a closed season from November to June. This four month season would reduce landings by 42% and reduce fishing pressure during the spawning season. This is the shortest season closure that was proposed.

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Reduce bag limit from 5 fish per day to 1 fish per day. An 80% reduction in the bag limit will also lower the landings while the season is open. Considering that there will no fishing pressure during 8 months of the year, the bag limit should not be reduced. However, it may be prudent to make a small reduction to encourage people to take larger fish and not quantity of fish.

Accept a 3 fish per day bag limit.

Action 8 - Increase the commercial and recreational minimum size limit for the Georgia through North Carolina (GA-NC) and the Florida Keys/East Florida (FLK/EFL) stocks of hogfish

- Georgia through North Carolina. Increase from 12" to 17"
 - o Accept a 14" size limit
- Florida Keys/East Florida. Increase from 12" to 16"
 - o Accept a 14" size limit

Imposing a larger size limit will also reduce landings. Increasing from 12 to 16 inches is a 30% increase in size and excessive. Accept the 14" increase.

The Council should implement these four changes and reject all other actions. This would reduce landings by more than 60% and allow the population of hogfish to rebuild. Landings should continue to be monitored to determine if these changes are successful.

Do not implement any Annual Catch Limits, Annual Catch Targets, or Accountability Measures for this species. Implementing these over a 10 year time frame will result in a closure of the hogfish season until 2027.

Thank you for attention.

Ted Walker

Ted1walker@gmail.com

407-304-9802

PUBLIC SUBMISSION

As of: 7/28/16 11:40 AM
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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0038
Comment from DJ Staub

Submitter Information

Name: DJ Staub
Address: XX,
Email: djstaub911@gmail.com
Phone: 5613399258

General Comment

I have harvested hogfish in the Gulf, Atlantic (South Florida area), and, primarily, the Florida Keys for the past 10 years on a routine basis. I highly value this species and feel strongly about doing my part in ensuring the sustainability of this fishery. While I do believe measures need to be taken to effectively manage this fishery, I find the current recommended actions stipulated in Amendment 37 to be far too extreme. An ideal approach would be to modify regulations in a way that allows for the proliferation of the species while minimizing unnecessary restrictions on our rights as Floridians to enjoy our state's resources. Allow me to offer my suggestions based on my first-hand experiences over the past decade.

First, let me describe what I believe is the root of the problem in South Florida and the Keys:

I understand the vast majority of the harvesting of this species comes from the recreational fishery. All of the harvesting of this species I have seen has been through spearfishing. I find it highly probable that the sharp increase in the harvest rate likely came from the rise in popularity of spearfishing (I have seen an exponential increase in the amount of people who spearfish over the years). Hogfish are extremely easy to spear and are a great target for beginners and those first learning to spear. Juvenile hogfish (in the 8-13" range) tend to be the easiest to spear and inhabit shallow reefs (in about 6 to 12 feet) that are ideal settings for beginners to learn how to spearfish. As such, the vast majority of hogfish harvests I see are huge numbers of small fish, primarily in the 12-13" range. Additionally, unlike in fishing, spearfishing does not allow for one to check the size of the fish before killing. Consequently, the prevalence of undersize fish being killed and thrown back or illegally harvested is ridiculous (in the Keys I see dead hogfish 8-11" floating around the reefs all the time). As more and more people vacation to the Keys and South Florida and attempt to spearfish, the more and more needless killing of the species ensues. There is a huge learning curve for spearfishing and the hogfish is so accessible to beginners that it is absorbing nearly all

of the pressure (not too many beginners can fill a limit with mutton snapper).

This problem needs to be addressed in a way that won't penalize those who harvest the fish conservatively and responsibly. My proposed solutions are as follows:

1. Increase the size limit to 14" (not 16").

There are several reasons why I suggest 14" specifically. First, there is a huge physical difference in hogfish that are 14" and up. That is the size where they tend to take the true male shape (narrower with a snout). Most experienced spearfishermen will tell you that this is the size where you instinctively realize underwater, "that's a decent size hog". Setting the size limit to match this will significantly reduce the number of killings of undersize fish. Secondly, any hog under 14" really does not yield a lot of meat, so many need to be killed in order to make a decent harvest. A 12" fish is simply not worth killing. Another reason is that, once hogfish grow beyond that 8-13" size range, they tend to move to deeper reefs (20 feet and beyond). This will make them harder to access and will help alleviate some pressure. Finally, the reason I do not suggest 16" is because, unless you are way out in the Gulf or on very deep reefs, hogfish over 16" are extremely hard to come by (especially in the Keys). This would be a huge blow to nearly everyone who targets these fish. Hogfish in the 14-16" class are not all that common (so are much less susceptible to over-harvest) but are still common enough to where it won't effect experienced spearfishermen too much.

2. Lower the bag limit to 3 per person (not 1).

I like the bag limit where it is, but for the sake of the species I agree it should be lowered. 3 fish is a reasonable bag limit that would keep most people happy. 1 per person is absolutely ridiculous and unnecessary. This is the first time the bag limit is being changed since I can remember, and an 80% reduction is definitely overkill.

3. If the season must be closed, do it in May-August.

If the previous actions are taken, I see no reason to impose further restrictions. Those measures alone can make huge differences. However, if a season closure is imposed, having it during summer would be ideal for several reasons. First, it will take a lot of the beginner pressure off since most people vacation to these areas during summer breaks and will try spearfishing when the water is warm. Second, it will coincide with the opening of grouper season (if both are closed during winter and spring, there will be very little for spearfishermen to target). There is also plenty else going on in the summer (snapper spawns, dolphin run, lobster season). The colder months are the best time for big hogfish, and closing the season would be a huge insult.

Thank you.

PUBLIC SUBMISSION

As of: 7/1/16 9:23 AM
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Posted: July 01, 2016
Tracking No. 1k0-8qi0-pt27
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0025
Comment from Regulation Overload

Submitter Information

Name: Regulation Overload

General Comment

If you really want to save the hogfish species from over exploitation then the balance between commercial limits and recreational limits needs to be reconsidered. This really applies to all fish species. As with almost all limits established by NOAA, SA Marine Fisheries Commission and other regulatory bodies, the decisions are always made in favor of commercial fishing. Since the commercial fishery takes the vast majority of fish resources, it seems obvious to me that to protect the species, the regulations need to be tailored towards reducing the commercial catch not the recreational catch. Regarding the Florida changes, how can you allow commercial boats to take 25 lbs a day while recreational fishermen are limited to one fish per person per trip? How can you limit recreational fishermen to a short season from July to October while the commercial fishermen can take fish all year long. I believe the regulations are once again being made in favor of commercial fishing at the expense of the recreational fishermen.

Hogfish are not a common recreational catch. Most are speared by divers. Hogfish are one of the few remaining species easily obtainable by divers. An increase in size limit to 14", but no larger, might be warranted but a limit of one fish per person is way too small.

Another example regulation excess is the current recreational limit on Blueline tilefish. The recreational limit is one fish per

vessel May 1st through August 31st. Commercial catch limit is allowed 100 lbs gutted year round, how absurd. Do you realize how much money the fuel costs are to get to the Blueline tile fishing grounds? Recreational fishermen may as well buy the fish at the market and save \$100, I guess that's the intended (commercial) idea right? As a native resident of Florida and currently an active recreational fishermen (although for many years I had a commercial license), I feel that with the continued tightening of recreational regulations, it's hard to justify the cost of recreational fishing in Florida waters anymore. Maybe I should get my commercial license reinstated!

PUBLIC SUBMISSION

As of: 6/27/16 1:06 PM
Received: June 25, 2016
Status: Posted
Posted: June 27, 2016
Tracking No. 1k0-8qef-bq9k
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0013
Comment from Eric Evans

Submitter Information

Name: Eric Evans

Address:

Key west,

Email: Eevans2836@yahoo.com

General Comment

As a recreational spear fishermen I find it tough to imagine any good coming from a 16 inch size limit and one per person. I see many people that shoot and throw back fish that they think are 12 inches and are not. What do you think will happen when the size limit goes up? As far as the hogfish population I was out the other day and had schools of hogfish at every one of the areas I stopped at. And as a responsible fishermen I targeted the bigger ones and just took enough for dinner for my family to have for dinner. But there were plenty of fish that wet legal.

I also would like to comment on commercial regulations. Having friends that harvest hogfish to make a living it would make a major problem for them if they had a 25 lb limit especially at 16 inch hat would be about 7 fish! I don't know but I can imagine that 25 lb of fish would not even start to cover the cost of leaving the dock. I would strongly suggest making it at least 100 lbs a day limit.

PUBLIC SUBMISSION

As of: 6/20/16 1:21 PM
Received: June 18, 2016
Status: Posted
Posted: June 20, 2016
Tracking No. 1k0-8q9o-1i6j
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0005
Comment from chad lee

Submitter Information

Name: chad lee

General Comment

I am a commercial spear fisherman on the east coast of florida I have been doing so for thirty five years . I spear fish year round from ft pierce to key west spending five months a year in the florida keys. Over the years I have noticed a dramatic size change in hogfish in the florida keys. Not really in the population but in size. fish in the upper keys are becoming males much sooner than they should. I am seeing females turning into males at 12 to 13 inches with the vast majority of females being 8 to 10 inches. When you move further south to the lower keys the fish are doing a lot better in size with most of the females reaching 15 to 18 inches before becoming males. Even further down towards the dry tortugas most of the females are making it to at least 20 inches before changing. Clearly the further south west you go the stock of fish is doing better. I still see the good numbers of hogfish but most fish don't make it to fourteen inches before there killed. Hogfish are very vulnerable to recreational spear fisherman because of there curious nature. And the florida keys gets a lot of pressure from recreational spearing. In my opinion you should increase the size limit to fifteen inches and reduce the recreational bag limit from five fish to two fish. Also a recreational season would also help. As for the commercial sector we take far fewer fish from the stock than recreational usually never reaching are quota do to the fact they are more of a by catch species than a primary target species. But if you have to make changes in the commercial sector I would be in favor of a hundred pound trip limit that would allow us to still harvest enough fish per trip for the economics without over fishing the stock of fish. THank You

PUBLIC SUBMISSION

As of: 6/20/16 1:21 PM
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Posted: June 20, 2016
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Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0004
Comment from N/A N/A

Submitter Information

Name: N/A N/A

General Comment

I have been fishing the coastal NC waters for 25 years. I rarely catch Hogfish by hook and line. They are not easy to hook. The problem with the over"fishing" of the Hogfish population are not recreational hook and line fishermen. It is the spear fishing that takes place on dive boats and by recreational divers. They are not the smartest fish and they will swim right up to a diver to check them out. Probably 95% of the Hogfish that I have seen on the local internet sites, photos and in person have been speared. I have seen up to 30 Hogfish taken in a day on dive boats.

If you want to protect these fish, put a limit on the number of speared fish. Or better yet, close it to spear fishing. This will help to maintain and rebuild the population and still allow the occasional thrill of a 20+ pound Hogfish at the end of your line.

PUBLIC SUBMISSION

As of: 6/27/16 1:07 PM
Received: June 25, 2016
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Posted: June 27, 2016
Tracking No. 1k0-8qen-rals
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0014
Comment from Hank Dean

Submitter Information

Name: Hank Dean

General Comment

This is NONSENSE and another fine example of government overreach.
No data anywhere supports the necessity for this new regulation.
Please reconsider.

PUBLIC SUBMISSION

As of: 6/27/16 1:06 PM
Received: June 25, 2016
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Posted: June 27, 2016
Tracking No. 1k0-8qed-bxp0
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0012
Comment from Tom Moran

Submitter Information

Name: Tom Moran
Address: United States,

General Comment

This is pure mismanagement, reducing commercial catch quotas to 25lb on fishermen that average 60-90 lbs of hogfish per trip even though as a whole the entire group in the Keys hasn't hit the quota in years is criminal. Also the 16 in limit will cause more fish to be killed and thrown back around lobster season. If you want to protect higfish, close season in August

PUBLIC SUBMISSION

As of: 6/20/16 1:22 PM
Received: June 19, 2016
Status: Posted
Posted: June 20, 2016
Tracking No. 1k0-8qae-qvel
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001

SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0008

Comment from Capt Tad Grubbs

Submitter Information

Name: Capt Tad Grubbs

General Comment

As an avid spearfisherman of hogfish here in the keys snorkel only these regulations will completely stop our harvest of these fish in shallow water. We ask so we can still enjoy the sport and hogfish for dinner that you keep our size the same and give us 3 per person. Capt Tad Grubbs

PUBLIC SUBMISSION

As of: 6/27/16 1:06 PM
Received: June 24, 2016
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Posted: June 27, 2016
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Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0011
Comment from Billy Southcott

Submitter Information

Name: Billy Southcott

General Comment

Rule is unreasonable. Invested thousands of \$\$ in boat & equipment for 1 hogfish! If you're going to close it make it a week before mini lobster season & a week following opening day of regular lobster season. 5 hogs 14 inch daily bag limit. or buy a hogfish stamp like lobster.

PUBLIC SUBMISSION

As of: 6/20/16 1:22 PM
Received: June 18, 2016
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Posted: June 20, 2016
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Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0007
Comment from Wayne Graham

Submitter Information

Name: Wayne Graham

General Comment

All that would have to be done is to stop spearing hogfish and they would rebound faster that way. Make it like snook hook and line only. If you make it 1 fish perperson per day it would not be worth going fishing

PUBLIC SUBMISSION

As of: 6/27/16 1:07 PM
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Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0015
Comment from Jonathan Anon

Submitter Information

Name: Jonathan Anon

General Comment

Hello all. I would really hope the bag limit doesn't go to 1 per person per day. I can see why the increase in size since I keep it above 15" due to the spawning period. But I spearfish for my family. I don't have the best job in the world and going out once a weekend (if the seas are good since I swim or kayak) really helps to feed my family. This change will affect a lot more then some people think. Thank you for your time in reading this.

PUBLIC SUBMISSION

As of: 6/27/16 1:08 PM
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Posted: June 27, 2016
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Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0017
Comment from Rene Gillet

Submitter Information

Name: Rene Gillet

Address:

19355 NE 10 Avenue

N. Miami Beach, FL, 33179

Email: john_gillet@hotmail.com

Phone: 3053314934

General Comment

I'm an avid spearfishermen in South Florida. I believe Hogfish populations are dwindling. I believe in imposing a commercial limit at something reasonable, like 25 lbs per day. I am in favor for new recreational fishing regulations that would increase Hogfish size limits to 14" and a recreational bag limit of 3 per day.

Let's face it! Overall, I'm sure that commercial fishing has a much larger impact on the Hogfish population. Recreational spearfishermen are few and they aren't out there fishing everyday. Most are hobbyists that go hunting once or twice a week as an avid hobbyist down to every once in a while for your average guy who happens to have a speargun he forgot about in the garage.

All in all, I believe in regulation and preservation of the species. But 1 hogfish per day for recreational spearfishermen is a little extreme. A spearfishermen wants to go out and spear at least 3 good fish to take home and cook for the family. Plus, Spearfishing is a much more sustainable form of fishing. Those mass catching nets attached to commercial fishing vessels are what needs to be monitored and regulated.

PUBLIC SUBMISSION

As of: 6/20/16 1:20 PM Received: June 17, 2016 Status: Posted Posted: June 20, 2016 Tracking No. 1k0-8q98-87vk Comments Due: August 01, 2016 Submission Type: Web
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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0002
Comment from Chris Edwards

Submitter Information

Name: Chris Edwards

General Comment

We manage to catch small numbers on hooks but divers have NO trouble spearing large amounts of them . I agree EVERYONE should have some sort of regulation on hog fish .

PUBLIC SUBMISSION

As of: 6/20/16 1:21 PM
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Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0003
Comment from Ron Rincones

Submitter Information

Name: Ron Rincones

Address:

3950 Corey Road

Grant Valkaria, FL, 32950-4119

Email: fishrico@aol.com

Phone: 321-727-1036

General Comment

In diving off the East Central Florida coast from Fort Pierce to Port Canaveral since 1982 I have seen only a hand full of hogfish, and they were almost all juveniles. I've possessed a Florida Crawfish CD License during this entire period.

PUBLIC SUBMISSION

As of: 6/20/16 1:22 PM Received: June 18, 2016 Status: Posted Posted: June 20, 2016 Tracking No. 1k0-8q9y-ue87 Comments Due: August 01, 2016 Submission Type: Web
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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001

SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0006

Comment from Anonymous Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

I have been an avid recreational fisherman and diver in South Florida for the last 45 years. I was spearfishing by the age of 10, and I am currently 50 years old. Hogfish are primarily most susceptible to spearfishing. This is not trying to punish any particular user group, but this is just a fact. Very few hogfish are caught recreationally by hook and line. If I snorkel in an area where spearfishing is allowed, I see very few, if any, hogfish, and If I do see hogfish, they are commonly very small. If I go to an area where spearfishing is prohibited and recreational hook and line fishing is still permitted, I see hogfish and often large fish and in good numbers. I think this is also anecdotal evidence that most recreational fisherman and recreational spear fisherman generally obey fishing regulations, whether there is evidence of enforcement or not. I love freediving and generally spend most of my time in water that is less than 35 feet, so I cannot comment on what divers see in deeper water. I also cannot comment on commercial limits, because I have very limited knowledge of these limits and how they effect the overall abundance of hogsnapper.

PUBLIC SUBMISSION

As of: 8/2/16 8:59 AM
Received: August 01, 2016
Status: Posted
Posted: August 02, 2016
Tracking No. 1k0-8r33-hz8h
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0042
Comment from Scott Antolak

Submitter Information

Name: Scott Antolak

General Comment

I would like to comment on the proposed Hogfish management changes for the Florida Keys/East Florida. I've lived in South Florida since 1992 and have spent a lot of time on the shallow water patch reefs and ledges from Ft Lauderdale to Big Pine. I see as many Hogfish now as I did 20 years ago but they are definitely smaller. Based on this observation I'd like to see the preferred changes modified somewhat.

1. 15 inch size limit. (I can live with the recommended 16 inch.)
2. 2-3 fish bag limit. (1 fish is too restrictive.)
3. Closed season from January thru April. (If peak spawning is February thru March, I think an additional month on either side is more than adequate.)

Thank you for considering our inputs.

PUBLIC SUBMISSION

As of: 8/1/16 9:18 AM Received: July 30, 2016 Status: Posted Posted: August 01, 2016 Tracking No. 1k0-8r1t-hx9q Comments Due: August 01, 2016 Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0040
Comment from Sarah Patterson

Submitter Information

Name: Sarah Patterson

Address:

4480 Ortega Forest Drive
Jacksonville, FL, 32210

Email: sarahpatterson@comcast.net

Phone: 904-476-0347

General Comment

I can understand increasing the Hogfish legal length from 12" to 13 or 14" but please do not decrease the bag limit or create a seasonal closure. Thanks, Sarah

PUBLIC SUBMISSION

As of: 8/1/16 9:18 AM Received: July 30, 2016 Status: Posted Posted: August 01, 2016 Tracking No. 1k0-8r1t-s8w5 Comments Due: August 01, 2016 Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0039
Comment from Walt Quinn

Submitter Information

Name: Walt Quinn

Address:

4480 Ortega Forest Drive
Jacksonville, FL, 32210

Email: waltquinn@comcast.net

Phone: 9044451535

General Comment

I am a Floridian and avid spearfisherman for over 20 years. I am not against a slight increase in the size limit but please do not change the bag limit or endorse seasonal closures. There are increasingly less and less reasons to own a boat and pay for gas and if legislature changes drastically when it comes to Hogfish, this could be the 'straw that breaks the camels back' for many avid divers. Thank you.

PUBLIC SUBMISSION

As of: 7/25/16 9:55 AM
Received: July 20, 2016
Status: Posted
Posted: July 25, 2016
Tracking No. 1k0-8qv8-es9z
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0036
Comment from Steve Babich

Submitter Information

Name: Steve Babich

General Comment

I have been spear fishing hogfish for 20 years in the lower keys. I have noticed a decline in numbers at 50% less than what there used to be (observational).

PUBLIC SUBMISSION

As of: 7/25/16 9:55 AM Received: July 24, 2016 Status: Posted Posted: July 25, 2016 Tracking No. 1k0-8qyl-2at2 Comments Due: August 01, 2016 Submission Type: Web
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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0037
Comment from Donald Doherty

Submitter Information

Name: Donald Doherty

Address:

708 North St
Ocean City, NJ, 08226

Email: FunTimeCrabbing@gmail.com

Phone: 6092713621

Fax: 16097847815

General Comment

As a charter operator and spear-fisherman, I am in favor of an increase in the minimum size to 15 inches and a bag limit of 2 per day. A closed season is really not necessary if the size and limit are imposed. Similarly, commercial limits are required.

PUBLIC SUBMISSION

As of: 7/15/16 3:08 PM Received: July 11, 2016 Status: Posted Posted: July 14, 2016 Tracking No. 1k0-8qpc-sbch Comments Due: August 01, 2016 Submission Type: Web
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Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0034
Comment from Pedro Orellana

Submitter Information

Name: Pedro Orellana

Address:

3366 SW 25th St.

Miami, FL, 33133

Email: Turo060683@Gmail.com

Phone: 3057441881

General Comment

Hogfish should be closed to spearfishing, and commercial fishing. It should be recreational, rod and reel only, and a bag limit of 2 per person. The vessel limit should be 4 per day. It should apply equally across state and federal waters. furthermore there should be a closure of season during spawn. There should be no change to size limit.

PUBLIC SUBMISSION

As of: 7/15/16 3:09 PM
Received: July 13, 2016
Status: Posted
Posted: July 14, 2016
Tracking No. 1k0-8qqe-sgkj
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0035
Comment from Michelle Morris

Submitter Information

Name: Michelle Morris

Address:

7 cormorant
Key west, FL,

General Comment

Hello my name is Michelle Morris. I run Spear It Charters in Key West, Florida. My passion is spear fishing and teaching children, wounded veterans and beginners a new way to fish. This closure and limitations will basically put me out of business. I am in total agreement of increasing the size limit but not the bag limit. I do not know who is doing the studies on hogfish but there are very few on the reef mostly males. Hogfish like the patch reefs fairly shallow under 25 feet. Now the closure on yellowtail will affect my fishing charters. Who ever is making these rules I challenge you to spend two weeks with me on my boat. I get up at 5 a.m. Sometimes I don't finish until 7 p.m. Please don't take away my dream and passion. Thank you.

Michelle Morris
Spear It Charters
305-587-3621.

PUBLIC SUBMISSION

As of: 7/11/16 12:34 PM
Received: July 11, 2016
Status: Posted
Posted: July 11, 2016
Tracking No. 1k0-8qp0-gcve
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0033
Comment from Pete Stafford

Submitter Information

Name: Pete Stafford

Address:

168 Scarlet Oak Run

Clayton, NC, 27520

Email: spstafford@gmail.com

General Comment

In reference to the data collected for the GA-NC portion of the subject DEIS:

The ORCs method used to calculate ACL and TAC was derived from the MRIP which only accounted for hook and line anglers. Yet the document specifically says that divers are the primary harvester of hogfish in the GA-NC management area. This represents an inherent lack of knowledge for how many hogfish are being taken when statistics for the largest harvester of hogfish were not accounted for in the ACL/TAC calculation.

This amendment should estimate the number of hogfish harvested by divers before making a final determination on ACL/TAC. If this amendment passes as is, both divers and hook/line fishermen will share a pool of fish that was derived only using hook/line catch estimates.

This info is reflected in the economic part of the EIS as well.

PUBLIC SUBMISSION

As of: 7/6/16 9:44 AM
Received: July 02, 2016
Status: Posted
Posted: July 06, 2016
Tracking No. 1k0-8qje-888p
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0030
Comment from RJ Laskey

Submitter Information

Name: RJ Laskey

General Comment

This rule is intended to make a sportsman a criminal. This is a complete over-reach of our bloated, disgusting government. There are 3 levels of regulation. Size, quantity, and calandar time. Restricting on all 3 levels is complete government abuse. I could understand a small size incese, but both the 1 per person is beyond offensive.

PUBLIC SUBMISSION

As of: 7/1/16 9:23 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qht-zqpf
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0023
Comment from Joshua Yates

Submitter Information

Name: Joshua Yates

General Comment

As a life long resident of Homestead Florida and an avid outdoors man I can tell you from first hand experience that there is no shortage of hog fish in our area. As a matter of fact this year has been one of the better years that I have seen for legal size and over hog fish. Please leave the recreational fisherman out of this non-sense. Non-science!

PUBLIC SUBMISSION

As of: 7/1/16 9:24 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qi1-3fb0
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0028
Comment from Anonymous Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

I am very much in favor of proposals to change the regulations for hogfish in federal Atlantic waters (Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region). However, the proposed changes appear quite strict and would severely limit, if not shutoff, recreational fisherman. I encourage less drastic changes such as a smaller closed season and less strict bag limits. For example, an open season from May-September and a bag limit of 3 hogfish per day with 1 being over 16" is much more manageable change.

PUBLIC SUBMISSION

As of: 7/1/16 9:24 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qi1-s52x
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0026
Comment from Matthew Briggs

Submitter Information

Name: Matthew Briggs

General Comment

Another unnecessary recreational limit to further hurt Florida's fishing and tourism industry? It is quite simple, leave hogfish limits where they are at and eliminate commercial fishing for them. If there is such an urge to have a federally mandated season, only close the season during their spawning time, not a majority of the year.

PUBLIC SUBMISSION

As of: 7/1/16 9:25 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qi2-res1
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0029
Comment from Gary Nichols

Submitter Information

Name: Gary Nichols

Address:

146 Venetian drive

Islamorada, FL, 33036

Email: Lifeforce171@aol.com

Phone: 3053931415

Fax: 3056648358

General Comment

Dear safmc, please consider not raising the size of hogfish to 16". Please try an incremental increase of 14" first. This is important fish both recreational and commercial to our families and extended families livelihood and sport. I have spearfished and commercially fished hogfish for over 50 years. We have never caught a great deal of hogfish in the 16 inch size. A 14" hog is about 2 lbs and is perfect for restaurants and home use. Please consider allowing at least 2 or 3 per person at that size. There was a big spike this year in the number of hogs we saw. Commercially please consider 50 fish or 100 lbs as a limit to at least make a trip viable. I truly believe the impacts on the fishing public would be major if the drastic changes are implemented. Thank you for you consideration. Sincerely Gary Nichols 11 and the Nichols crew. We live and workin the middle keys and fish out of Conch Key!

PUBLIC SUBMISSION

As of: 7/1/16 9:24 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qi1-16kp
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0027
Comment from Chris Sanchez

Submitter Information

Name: Chris Sanchez

General Comment

I agree with 16 " size limit even a season for them I also believe that if you think that limiting the recreational angler will not solve the problem there is to much being taken for commercial use.if they want to sell these fish then they should pay for it ,set up some kind of aquaculture program ,study them ,farm them ect....

PUBLIC SUBMISSION

As of: 7/1/16 9:23 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qhv-wn4y
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0024
Comment from Lon Winkelman Jr.

Submitter Information

Name: Lon Winkelman Jr.

General Comment

I recently spent \$2000 on dive gear to start spearfishing. Primarily to target hogfish. I am for raising the minimum size but reducing the bag limit or season will make it not worth targeting hogfish. As a lifetime fishing license holder, I beg you to keep hogfish open year round and not reduce the bag limit.

PUBLIC SUBMISSION

As of: 7/1/16 9:22 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qht-uyrt
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0022
Comment from Samantha Messier

Submitter Information

Name: Samantha Messier

General Comment

As an avid free diver and snorkeler, I love enjoying the reefs with admiration for our natural species without feeling the need to spear or kill them. That being said, I do believe these new restrictions against spear fishing for Hogfish are quite harsh and may need some compromising.

For example, the number of the daily limit per person seems low, even to me. Our tourist industry is based on, "The Sportfishing Capital of the World" reputation. For guests to travel to Key West, arrange for a charter boat or bring their own, the cost can amount easily. Knowing they can only keep one fish per person, they may choose not to participate in this beloved, "Keys Pastime", or worse they may choose not to visit at all.

The season closure time seems very long as well. I can understand and respect spawning seasons, however eight months seems excessive.

Let's preserve our beautiful reefs while still allowing our visitors and locals to keep their favorite past time.

PUBLIC SUBMISSION

As of: 7/1/16 9:22 AM
Received: June 30, 2016
Status: Posted
Posted: July 01, 2016
Tracking No. 1k0-8qhs-8jw8
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0021
Comment from Eric Messier

Submitter Information

Name: Eric Messier

General Comment

Spearfishing in The Keys is a way of life for most residents and hog fish is one species that is most targeted. Spearfishing is the most respectful way to hunt fish. There is no harming or killing of other species that is not targeted. By jumping the size limit to 16 inches from 12 inches is going to do more harm than good. Especially with a divers limit to one fish per day. The throw backs will be greater than the amount of fish harvested. The 8 month closure is way too long and the timing of the closure is way off. The bigger fish move into shallower water during the winter months due to colder water and move deeper during the summer. Also during the summer months we receive a lot out of town divers who disrespect rules and regulations. Mini Season in July is a perfect example. Researchers need to be reevaluated because this is ridiculous.

PUBLIC SUBMISSION

As of: 6/27/16 1:07 PM
Received: June 26, 2016
Status: Posted
Posted: June 27, 2016
Tracking No. 1k0-8qf4-fee7
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0016
Comment from Jeremy Loercher

Submitter Information

Name: Jeremy Loercher

Address:

Key West, FL, 33040

Email: fishflats88@aol.com

General Comment

I do support an increased size limit on Hogfish. I would also support a season on them, but 2 to 4 months is too short. If they were closed from January 1st until March 31 that could make sense. I free dive in the lower Keys and see many Hogfish around (lots of small ones) and I believe that the fishery is doing ok and could benefit largely from a little more regulation. But what is proposed to way TOO MUCH.

PUBLIC SUBMISSION

As of: 6/29/16 9:07 AM
Received: June 27, 2016
Status: Posted
Posted: June 29, 2016
Tracking No. 1k0-8qfv-2r38
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0018
Comment from Don Waters

Submitter Information

Name: Don Waters

Address:

14610 SW 69th Ave.

Palmetto Bay, FL, 33158

Email: don-waters@frenchtex.com

Phone: 305-801-9471

Fax: 305-232-3332

General Comment

Your proposed amendment 37 is ridiculous and is based on lies!!! I am a Fla. native diver, with over 50 years of active spearfishing experience in Florida. The last forty years of spearfishing has concentrated on Key Biscayne to Key West, with regular weekly trips in the upper keys, since my boat is located in Biscayne Bay. Your proposal to raise the size to 16" will eliminate 99% of all Hog Snapper catch by recreational Florida fishermen!! Since I have been spearing Hog Snapper well over 40 years, I can tell you that while my family has shot a few Hogs over 16" during this time, the vast vast majority of fish have been under 16". Yes there are plenty over 16" in the Bahamas, and yes in deep water we can find over 16" fish, but almost never in water less than 60 feet. Now I am talking about the same conditions 30 to 40 years ago, as well as now!! There just never was very many over 16" fish in less than 60 feet!! I do not understand why the need to reduce the total catch by 90%. We take and see just as many Hogs now as we did 20 to 30 years ago. The current FWC rules and regulations make a lot of sense and should not be changed!! I have competed in 14 years of Florida spearfishing tournaments, and 7 USA National spearfishing tournaments, so yes I personally shoot more than the average diver, but my 4 adult children, and 5 grandchildren have the same success that i have. Also my many first time divers enjoy great success with me, when i show them how it is done. No shortage of Hog Fish where I take them. Your amendment #37 smells like 3 day old fish. I see Federal Government at its worse with this #37. I would be happy to meet any of you to discuss in person your false assumptions, and the gall you have, in attempting to cut my family out of one of our prime enjoyments in life with false science. Sincerely, Don M. Waters Sr.

PUBLIC SUBMISSION

As of: 6/30/16 11:29 AM
Received: June 29, 2016
Status: Posted
Posted: June 30, 2016
Tracking No. 1k0-8qh4-gdwc
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0019
Comment from Sebastian Arcos

Submitter Information

Name: Sebastian Arcos

Address:

1705 SW 97 Place

Miami, FL, 33165

Email: arcoss@fiu.edu

Phone: 305-431-4576

General Comment

I respectfully would like to comment in regards to proposed Amendment 37 to modify the management of hogfish. I believe the actions (#8, 10, and 11) proposed to manage hogfish in Florida and the Florida Keys are excessive and unwarranted. If implemented as proposed, these actions will effectively eliminate hogfish from the recreational catch in this region. I have been spearfishing regularly in South Florida and the Florida Keys for over ten years. Hogfish easily represents 50% of the daily catch on an average day. My personal experience indicates a clear decrease in the abundance of hogfish over 20", but no decrease in the overall abundance of hogfish of legal size. The number and size of hogfish I catch on a regular basis has not changed in any significant way in the last dozen years. Just last week I speared three over 18".

Because I believe in protecting our fishing resources for future generations, I would support some reasonable revisions to the current regulations for hogfish. For example, a combination of two of the following: increasing the minimum legal size from 12 to 14 inches; reduce the recreational bag limit from 5 to 3 fish per person per day; establish a three or four month closed spawning season.

PUBLIC SUBMISSION

As of: 6/30/16 11:29 AM
Received: June 29, 2016
Status: Posted
Posted: June 30, 2016
Tracking No. 1k0-8qh9-lof8
Comments Due: August 01, 2016
Submission Type: Web

Docket: NOAA-NMFS-2016-0068

Amendment 37 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region.

Comment On: NOAA-NMFS-2016-0068-0001
SGAm37_DEIS

Document: NOAA-NMFS-2016-0068-0020
Comment from albert tropea

Submitter Information

Name: albert tropea

General Comment

PLease consider this reg is not fair to Keys Residents this Reg would give our hogfish to mini season people
commercial limits would limit hogfish in our markets.
Logic would bear that if you increase size limits you would increase 'throw backs'