

Summary of Public Comments on Amendment 41

Below is a summary of comments that were received during the August 2 webinar, and during the in-person hearings on August 15-17. The summary also includes written comments received via the online comment form on the Council's website as of Friday, August 19. Written comments received after the August 19 deadline are attached to this summary. An approximate breakdown of the number of attendees at each in-person hearing and the sectors they represented is below:

Dania Beach public hearing: 18 attended and 13 commented. Attendees were approximately 16% commercial, 44% recreational, 5% for-hire and 33% other (including 2 NGOs)

Duck Key public hearing: 13 attended and 6 commented. Attendees were approximately 7% commercial, 31% recreational, 31% for-hire, and 31% other.

Key West public hearing: 56 attended and 19 commented. Attendees were approximately 14% commercial, 11% commercial/for-hire, 32% for-hire, 11% recreational/for-hire, and 32% other (including 1 NGO).

Action 1. Specify maximum sustainable yield (MSY)

Currently: not specified

Preferred Alternative 2. 912,500 pounds whole weight (lbs ww)

Comments:

- Some support for preferred (1 commenter)
- SG AP DID NOT HAVE RECOMMENDATION

Action 2. Specify minimum stock size threshold (MSST)

Currently: not specified

Preferred Alternative 3. $MSST = 75\% SSB_{MSY} = 3,486,900$ lbs ww

Comments:

- Some support for preferred (1 commenter)
- SG AP DID NOT HAVE RECOMMENDATION

Action 3. Revise annual catch limits (ACLs) and optimum yield (OY)

Currently: $ACL = OY = ABC = 926,600$ lbs ww

Commercial ACL = 157,743 lbs ww

Recreational ACL = 768,857 lbs ww

Preferred Sub-alternative 2a. $ACL = OY = ABC = 587,633$ lbs ww for 2017.

Commercial ACL = 100,015 lbs ww (for 2017)

Recreational ACL = 116,127 fish (for 2017)

Comments:

- ACL should be set below the ABC
- Need to consider discards in setting the ACLs
- SG AP DID NOT HAVE RECOMMENDATION

Action 4. Revise the recreational annual catch target (ACT)

Currently: ACT = recreational ACL*(1-PSE) or ACL*0.5, whichever is greater
= 668,906 lbs ww

Preferred Sub-alternative 2b. ACT =85% recreational ACL = 98,708 fish

Comments:

- Proposed ACT now is OK but Council should consider stepping down from the ABC further so no ACT will be needed.
- SG AP DID NOT HAVE RECOMMENDATION

Action 5. Modify the minimum size limit

Currently: minimum size limit = 16 inches total length (TL)

Preferred Alternative 3. 18 inches TL

Comments:

- Three (3) commenters spoke in support for Alternative 1 (No Action)
- Twenty four (24) commenters spoke in support of increasing the minimum size limit to 18 inches
- Several people expressed concern about a possible increase in discard mortality problem with an increase in the minimum size limit.
- Three (3) commenters supported an increase to 20 inches minimum size.
- Several commenters stated support for an increase in the size limit as long as the bag limit remains at 10 fish/person/day within the snapper aggregate.
- Consider increasing the size limit for the commercial sector only as recreational fishermen, especially shore anglers, do not have access to fish larger than 14-15 inches.
- SG AP RECOMMENDS INCREASING THE MSL TO 18 INCHES

Designate a spawning season for regulatory purposes

Currently: commercial restrictions apply in May-June: 10 fish/person/day or 10 fish/person/trip, whichever is more restrictive.

Preferred Sub-alternative 2a. For regulatory purposes, designate the following April-June as “spawning months”. The remainder of the year would be the “regular season.”

Comments:

- Some Support for **Alternative 1 (No Action)**

- Need better information on spawning periodicity or supply more rationale.
- Some support for preferred April-June spawning months.
- SG AP RECOMMENDS NO ACTION

Modify the recreational bag limit

Currently: 10 fish/person/day, included in the 10-snapper aggregate bag limit.

Preferred Sub-alternative 4b. Retain mutton snapper within the recreational 10 snapper aggregate bag limit in the South Atlantic, but specify bag limit of 3 fish/person/day within the aggregate bag limit year round.

Comments:

- Six (6) commenters directly supported the 3 fish/person/day year-round bag limit
- Eleven (11) commenters supported a decrease in the bag limit to 5 fish/person/day year round
- There was some support for no retention during the spawning season.
- Commenters also expressed support for Alternative 1 (No Action) because, according to analyses, a change in the bag limit has no effect on restricting harvest.
- Some commenters supported a reduction in the bag limit as long as the size limit remains at 16 inches.
- Some support for a decrease in the bag limit to 2 fish/person/day year round
- Concern about recreational sales being very high under the current bag limit. A decrease in the bag limit would serve to curb this.
- Year-round bag limits are better for FL because there are lots of vacationers and seasonal limits could affect their vacation plans.
- SG AP RECOMMENDS 3 FISH/PERSON/DAY YEAR ROUND

Modify the commercial trip limit

Currently: Commercial restrictions apply May through June - *10 fish/person/day or 10/fish/person/trip, whichever is more restrictive.*

Preferred Sub-alternative 2a. Establish a commercial trip limit of 300 pounds for mutton snapper during the “regular season” (i.e., non-spawning months) in the South Atlantic.

Preferred Sub-alternative 3b. Specify a commercial trip limit for mutton snapper during the “spawning months” in the South Atlantic of 3 fish/person/day

Comments:

- Two commenters (2) spoke directly in support of a commercial trip limit of 500 pounds.
- Commercial fishermen in the Keys do not catch 500 pounds of muttons in one trip.

- Some support for vessel limits instead of per-person limits for commercial sector (suggestion of 10 to 15 fish per vessel).
- Two commenters (2) supported a 5 fish/person/day during spawning months for commercial sector.
- Many commenters felt that proposed management measures for commercial sector are too restrictive, especially the possession limit during spawning months.
- Keep commercial and recreational regulations during spawning the same. Since grouper open in May, commercial fishermen would like to be able to take more than 3 mutton per person. Also a lower possession limit in combination with the 25 lbs trip limit proposed for hogfish is going to affect some commercial fishermen.
- Several commenters expressed concern about dead discards.
- Because commercial industry is so accountable for their catch and current regulations allow sale of mutton snapper landed during May-June, there is support for maintaining the 10 fish per person possession limit during the spawning period.
- Dual permitted vessel holding commercial and charter head boat snapper grouper permits, it would only be allowed to have a maximum of four people aboard for a commercial trip. The per person/day rule gives some boats the advantage of bringing a larger “crew” out commercial fishing just to retain more fish.
- Commercial sector has not reached its ACL since it was implemented so why consider restricting harvest?
- A 300 or 500 pound trip limit is too high because mutton are not available in those quantities over the majority of the species range throughout the year or there are not that many participants.
- Consider requirement for recompression device for commercial sector and phase-in restrictions over time.
- SG AP RECOMMENDS NO ACTION

General Comments:

- 400% increase in biomass at Riley’s Hump yet the new assessment indicates there has been a reduction in biomass overall. Why?
- Unfair for fishermen who are fishing for king mackerel in state waters to be allowed a higher possession limit of mutton snapper than the fishermen who are targeting king mackerel in federal waters.
- Regulations at spawning sites need to be addressed and prioritized. Please restrict gear and fisheries exploitation at the spawning site 11 miles SW of Key West.
- Consider a seasonal closure at Western Dry Rocks. Also heard support for total closure. If fishing restrictions, consider bottom fishing closure but allow surface fishing. Western Dry Rocks should have been closed a long time ago.
- Fishermen seeing smaller muttons at spawning aggregations in recent years.
- Need to identify other locations where fish are aggregating to spawn.
- Consider a higher multi-day trip limit for the recreational sector.
- Council should use size limits proactively, instead of waiting until a stock assessment is complete. Size limits also don’t seem to be as effective.

- Concern about localized depletion of mutton snapper.
- Concern that recreational landings are skewed because they include charter and charter captains are better at fishing than anglers that fish infrequently.
- Consider stepwise approach to see what each measure does instead of making a lot of changes all at once.
- Fishermen stated that there are other areas where mutton snapper and other fish gather to spawn.
- Consider a slot limit to protect spawning fish.

Comment for the Record:

Snapper Grouper Amendment 41

My Name Is Vincent Bonura. I am owner of F/V GOIN' OFF. We primarily fish out of the Florida Keys. This is my comment for the commercial fishing side of Amendment 41.

Action 5- I would like to see **alternative 1 (no action)**. Keep the minimum size limit for mutton snapper in the South Atlantic region at 16 inches total length.

Action 6- Spawning season. The current May and June spawning season are the most accurate spawning months for mutton snapper. I do not want to see this changed. **Alternative 1 (no action)** is the most appropriate action.

Action 8- Modify mutton snapper commercial trip limit in the South Atlantic region.

Regular season- I personally would prefer **alternative 1 (no action)**, but if you absolutely must have a commercial trip limit, we (**traditional bandit boats**) need the largest trip limit available. Our trips are multiple days and we do not run back and forth every day to offload our catch. A minimum of 500 pounds (**sub alternative 2c**) is mandatory to make these trips economically viable.

Spawning Months- Once again we (**traditional bandit boats**) need the largest limit possible. We fish for multiple days and typically with only a one to four-man crew. I believe we should have a vessel/trip limit instead of a per person/day limit.

Also, as another individual mentioned during the public hearing webinar comments on August 6, 2016, that if that vessel is a dual permitted vessel holding commercial and charter head boat snapper grouper permits, it would only be allowed to have a maximum of four people aboard for a commercial trip. The per person/day rule gives some boats the advantage of bringing a larger "crew" out commercial fishing just to retain more fish.

Sub-alternative 3d- Twelve fish/vessel/day is your largest alternative for a vessel limit. I do not think this is enough fish and should be reevaluated for a larger number of fish or go for a pounds per trip instead.

RECEIVED

AUG 08 2016

South Atlantic
Fishery Mgmt. Council

Tight Lines,



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Tropical Anglers Club

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Miami, Florida 33155

Phone 305-595-3522
Date 8-18-16

Attention South Atlantic Fishery Management Council:

My name is Dale Walker. I am president of the Tropical Anglers Club of Miami, Florida. We are a light tackle and conservation-minded fishing club founded in 1953. As well as Miami's oldest fishing club, we are also Miami's largest with 114 members and growing.

I as President, with the good graces of many of our members, have taken an interest in the mutton snapper workshops as we and many of South Florida's fishermen have a vested interest in the fish limits, fish populations and the general health of the fish and their environmental conditions.

At our Tuesday night meeting on 8-16-16 all 39 members present agreed with the following recommendations of which we spoke at great length:

We support an 18" minimum size limit for mutton snapper because we want the mutton snappers to have a greater chance to spawn.

- We also support closing off Western Dry Rocks near Key West for any bottom fishing during the spawning months (May, June and July), but would allow trolling for dolphin and/or other pelagic species in the Western Dry Rocks Area during the proposed May-July closure.
- We propose you just close off any bottom fishing in the Western Dry Rocks during those months to make it easier to enforce.
- We also agree that any other mutton snapper spawning grounds identified in the future should be closed through the May-July spawning months because we have seen the positive results personally as in the 400% increase in mutton snappers due to the "Riley's Hump" closure in the Dry Tortugas. They are just too easy to catch during the spawn in these gathering areas.

- Furthermore, we support a 5 fish limit per person per day within the existing 10 fish aggregate now in place year round.

Our reasoning for 5 fish instead of 3 is that it adds only a very small percentage of fish as described in Table S-7 to the total mutton snappers harvested at an 18" minimum length, as opposed to the current 16" minimum length. This would allow fishermen who travel a long distance and put forth a greater effort with gas, time, money, etc. to be able to harvest just 2 more fish each per day.

These specialized fishermen include lifelong fishermen such as us and many boat captains and fishing guides who have spent their entire lives fishing the waters of South Florida. We have a vested interest as stakeholders in what you are about to decide.

We would see your favorable action on these recommendations as an action by you, the government, to show that you care about us and our lives and are willing to work with us. We believe our proposed modifications are fair, reasonable and beneficial to the resources that you and we desire to protect.

Please weigh in on the impact of a 3 fish per day limit compared to a 5 fish per day limit and its impact on the livelihoods and the families of the fishermen who depend on these fish for a living and for regular fishermen such as our club members who put forth the extra time and effort to catch these fish.

By allowing 5 instead of 3, we would still have a 50% reduction (as compared to a 70% reduction for just 3 per day). Allowing us to keep just 2 more muttons at the 18" minimum size (as per Table S-7) you can give us a 20% increase in the amount of muttons that anglers can keep and not affect the fish populations so much.

Please let this proposal serve as a message that we as fishermen and you as the government can work together and compromise on our beloved mutton snapper. We can set a prime example of government and its citizens working together and meeting each other in the middle for all to see so that all of us and the mutton snapper can benefit from our collective decisions.

Thank You.



Dale Walker, President
Tropical Anglers Club
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