

Summary of Scoping Comments on Amendment 46 to the Snapper Grouper Fishery Management Plan

(Based on comments received from January 13, 2023 through February 10, 2023)

Below is a summary of comments that were submitted electronically and received during the two scoping webinars held on January 30th and February 6th. The scoping document and presentation can be found [HERE](#). Comments provided during the webinars (n=7) and online (n=9) are included at the end of this document.

Respondent Characteristics:

State	Number of Respondents	Affiliation	Number of Respondents ¹
Florida	10	Private Recreational	9
North Carolina	4	For-Hire	3
South Carolina	1	Commercial	3
Texas	1	Non-Gov't Organization	3

¹Some respondents chose more than one affiliation.

A summary of the comments is provided below:

Establish a private recreational snapper grouper permit to fish for, harvest or possess snapper grouper species in the South Atlantic Region.

There were nine comments in favor of developing a private recreational permit and six comments in opposition. Commenters in favor of developing such a permit noted:

General comments:

- A permit is important to identify the number of anglers that are fishing for snapper grouper species.
- A permit should be implemented immediately to improve recreational data.
- Consider a fee for the permit.
- A permit could help gather better information on the prevalence and use of gear types (such as the use of manual reels, electric reels, and spear fishing gear).
- Creating a permit is a recommendation of the Snapper Grouper Advisory Panel.

Federal versus state permit:

- There were comments in favor of a federal-only permit, a federal permit where states could opt out if they create their own permit, and a state-only based permit with no federal component.
 - It was noted that the National Saltwater Angler Registry could provide a framework or example for how states could opt out of the federal permit if implementing their own state-based permit.
 - A commenter in favor of a state-only based permit noted that funds raised by such a permit could more effectively be directed to support fisheries management programs.

Species:

- Some commenters felt that a permit should cover all snapper grouper species.
- There were also comments in favor of covering the same species already falling under the Florida State Reef Fish Angler Designation.

Vessel-based versus angler-based permit:

- Several comments were provided in favor of an angler-based permit.
- One commenter noted that an angler-based permit would provide a better “head count” of fishery participants. Another commenter noted that an angler-based permit would be consistent with the Florida State Reef Fish Angler Designation.

Commenters opposed to developing a private recreational permit noted:

- There are other ways to collect recreational data and a permit is an inappropriate response to poor data.
- A permit would be an additional tax on anglers.
- Do not want to grant more authority to federal fisheries managers and a federal permit would be government overreach.
- A federal permit would marginalize the fishing community and deter anglers from fishing. Particularly if a fee is charged.

Establish an education component to coincide with the development of a private recreational Snapper Grouper permit.

There were eight comments in favor of developing an education component and one comment in opposition. Commenters in favor of developing an education component noted:

General

- There was general support expressed for developing an education component.
- A commenter expressed support for developing a course on safe handling and release of fish prior to purchasing a state fishing license.
- A commenter noted that education is important but a course should be simple and quick to complete.
- Involve the Outreach and Communications Advisory Panel when developing materials.

Timing of implementation:

- Most comments were in favor of implementing an education component immediately as opposed to a delayed implementation.
 - One commenter noted that the Council should start to develop the education component as soon as possible and ahead of the permit implementation.
 - FWC has had discussions on an education component so there may be an opportunity to collaborate or pilot on a state basis.

Commenters opposed to developing an education component noted:

- An education component would be an additional tax on anglers.

Other Comments

- Several commenters were disappointed to hear that reporting was no longer being considered in Amendment 46.
- Several commenters noted frustration with red snapper management.

SNAPPER GROUPER AMENDMENT 46 PUBLIC SCOPING WEBINAR January 30, 2023

PUBLIC COMMENT

KAREN ANGLE. Just to comment in regards to vessel versus angler, if the main purpose is to get some level of a head count and there isn't necessarily going to be a required reporting component at this moment, I think angler may be more sensible in terms of getting better numbers. I think education, I would agree with the gentleman who mentioned this. I think education is key, and I like the idea of having education, of course, when you start requiring education. Sometimes there's resistance but if it could be something quick and simple, I think it's a great thing to have or have education out there initially before the permitting instead of waiting till a later date.

DEWEY HEMILRIGHT. I'm commenting for myself as a commercial fisherman that sees the need for both permitting and mandatory reporting of the recreational industry. The timeline that the Council has chosen, I think, we're going to have a lot more issues in the South Atlantic with species being overfished and overfish occurring in the future before any of this gets put in place. I applaud the Council for continuing of education, but education can only go so far when you don't know your universe of anglers and what they're catching. When we look at MRIP, PSCs that are above 50 and given that MRIP will not be publishing the PSCs above 50 in the future according to their website, it's very troubling. This stuff does take time, but the sense of urgency I do not see this Council seeing it 5 to 6 years out of actual mandatory reporting. I think our fisheries, given that a lot of these are single stock fisheries that are up and down this coast, we're going to have some big issues because of failure to account what the recreational catch discard and cold occurring species.

A lot of my information comes from going back and reading meeting minutes since 2010 of the administrative records and things that are lacking and are needed. Mandatory reporting is needed on the recreational industry and so we'll just have to see how it plays out. But, our stocks are not doing good, and it's going to get worse. There will be some people that are on this webinar that will probably be retired in 5 or 6 years so would not affect them. It does not look good for our fisheries without recreational of vessel reporting would be best because it's less amount of folks and mandatory reporting would be even better so that way you have an idea of the species, the rare event species, that are being caught and discarded in cold currents. Even though this is only going to be implemented if it continues in 3 years to permit and the other part if it ever does, is another

2 or 3 years out. It's just too long. I see that a lot of our fisheries are going to be in a lot of trouble way before then.

MARTHA GUYAS. Commenting for the American Sportfishing Association. We've been supportive of the concept of development of a permit to get to that end game of improving recreational data. I'm going to try to hit some of the questions you asked John but I'm going to figure out by the box a little bit. Since Florida already has a permit and potentially down the road there is a potential for other states to develop a permit, I think however the Council goes about this, there needs to be some way for states that have permits or developed permits to be compatible with this federal permit. I kind of feel like a possible avenue for this is using the national saltwater angler registry as a model in which case there is basically a framework of compatibility requirements that the states can implement so that their anglers are exempt from having to register in the national saltwater angler registry and pay the \$25 or \$35, or whatever it is that it costs, to get that permit. There may already be the administrative framework there with the national saltwater angler registry site that exist for the few entities, few states and territories that do not have compatibilities.

Okay so let me try to hit on some of the questions that you asked, kind of keeping that framework in mind. In terms of vessel versus angler, I mean, certainly it seems to me angler makes sense. Again, Florida already has this. They're going to cover likely a large number of the snapper grouper anglers in the South Atlantic, and I also think just not having duplication for anglers that are already going to the state website to purchase their license. Having the permit in the same place is a major convenience for the customer; your likely to have more people sign up for it that actually need it. I think there's a lot of benefits there. I do think it should be for private vessels in federal waters. I actually kind of wonder if you could do shore mode with this permit since it is a federal permit and there is no shore mode in federal waters. In terms of species, it certainly makes sense to start with the state reef fish survey species. I think that likely would cover a lot of snapper grouper anglers by proxy. I realize there may be some differences, but potentially if Florida is willing to amend their list, then that may potentially is a negotiation there.

Supportive of the educational component of this. I kind of feel like the Council should consider to start developing that now. Just from a pragmatic standpoint, I feel like it could take a while for this permit to make it through the Council process and all the administrative process before it gets implemented. I think a lot of us recognize that education would be a benefit to anglers and the snapper grouper complex as soon as possible. I know FWC have had discussions about an education component and so maybe there is an opportunity for piloting that on a state scale at least to start. I also think it's just going to take time to develop that too; working through potentially your Education and Outreach AP making sure you've got the materials right and that they are going to be useful to anglers. Again, overall I see a lot of benefits toward looking at this permit as a down the line data collection tool and to identify the universe of anglers.

ALANA HARRISON. I do just want to point out that the commercial side, I believe we are going on 30 years of reporting and we're almost probably near 30 years of being on a 2 for 1 and very restricted and our permits which we feel that every single year. I just want to start with that. Why are we confining ourselves to snapper grouper permits. We're having issues with the dolphin fishery, we see that from Florida especially. The king mackerel fishery is starting to raise red

flags. We're seeing a lot more tournaments in that, and so I feel that why not just create a South Atlantic recreational permit? It would encompass all of the fisheries that we manage in one permit so we can get a count and when the people go to sign up for the permit, they just check the box which fisheries you participate. Check the box, and then they can send in their \$100, \$150 or whatever it is. I feel like if we're going to spend all this time and effort going through scoping and council meetings, then we should do it one grand swoop and put everything under the umbrella of the South Atlantic private recreational fishing permit. Doesn't the for hire and the commercial have to have a permit for every fishery that the South Atlantic manages? So, I think that we should think about that because it starts here but it does not end here, and we could get ahead of the ball and we could start talking about that now.

**SNAPPER GROUPER AMENDMENT 46
PUBLIC SCOPING WEBINAR
FEBRUARY 6, 2023**

PUBLIC COMMENT

TONY CONSTANT. To address the immediate questions that the Council is asking for as far as the amount and species. I feel that either what Florida is doing with 13 or the 15 species overall would probably be the best focus. I'd also like to address the education. I feel very strongly it should be mandatory and immediately. I think that you need to get the education in to take the permit; to apply for it. One of the things that about this fishery, we have had red snapper basically regulated strongly since January of 2010 when it started with Amendment 17A. It's basically been closed other than short windows for 13 years. During that time, we've seen this species grow back to possibly the biggest it's ever been; or at least to those numbers. At this point, we are to assume going forward that Amendment 46 that the Council is looking towards reopening this fishery in order for the public to have some sort of a normal fishery whether it's permitted, whether it has a season or something. But, we are to assume that Amendment 46 is headed in the direction of us getting this fishery open again.

What I'm getting when you take the data out, we're basically going to mimic what Florida is doing, not that it's a bad thing. But, if you mimic what Florida is doing, it's literally a head count. Now I understand you're saying it can add to data. Well, you're going to add head count data because you're not going to add catch data. Mortality is the issue here, and if we don't move that needle, it's impossible to open this fishery. Without reporting data, it will not allow access to the public. I want to give you a quick example of that. My wife and myself and another couple had been to Islamorada in the last two years consecutively. Each year we brought 4 fishing licenses, we applied and got 4 reef permits. We didn't bottom fish at all yet my data says we did. So, if you get no more data than that, you would be 100% wrong. So my point to that is if we had reporting, we could have at least said no or there would have been none caught.

I would like to suggest that the Council consider letting the states have a role in collecting this data from permitted anglers or permitted vessels. I really believe that the state's could do this more efficiently as well as cheaper. They would need some funding from NOAA, but as NOAA knows, if you don't have to do it, you're going to save money so will have money available. It can very

well be less expensive letting the states do it than letting NOAA do it as well. My point to all of this is we need to get the data going, and I think the states could do this a whole lot quicker. Florida, for one, already has a good base already started.

ALANA HARRISON. I was talking to my dad who has been a fisherman since the 80s, and my mom was the fish dealer so my dad would sell his fish to my mom for her market. It's always been a part of life, you fill out the logbooks at the dinner table, and it sometimes took until 9:00 at night but you filled them out. My mom filled out her dealer reports after dinner like clockwork. That's all I have ever know is recording your catch and so, I would just like to say I'm sorry if I come across like rude or impatient, but it's frustrating for me to have grown up watching that and then you guys telling us it's going to be until 2030. Climate change is going to have pushed all the fish out of our region so, at the end of the day, I'm kind of like what's the point. Then, at the same time, I'm getting so frustrated because what is the point in making us report for that long. Couldn't you have given us a free pass? My dad would have been able to enjoy the dinner with his family; my mom. It's just so frustrating. I really hope that we can make some progress somewhere sooner before, like I said, before the fish leave our region.

JIM ATACK. I can understand Alana's concerns and frustrations with timing. We've felt that way when I was on the Advisory Panel. There's been a lot of fish in a lot worse shape—there's great grouper, your gags, your scamps and true, I mean, lot of time, certain things have changed; some of these stock could probably go below the rebuilding biomass required for them to recover. Kind of like the Nassau grouper did. Hopefully we can get this done and happen before that happens. Back to the Amendment we've got now, I would propose that we do have boxes or questions on there for checking for what type of gear types people use and name more than two types of gears, I'm not sure, I guess you guys can get that when you go through your _____ of this permit; this Amendment. I believe, I'm not familiar _____ in Florida, but I guess my first gut reaction just if you're going to fish for snapper grouper, you should have a permit—not just 11 species or 15 species. I agree that education should be done and after we get this, it should be immediate and mandatory. It should be individual. You want to know how many people go fishing each year. You don't want to know how many boats; you do want know how many boats I guess, but the real thing is how many people; how many rod and reels are out there every year, and you'll get better data and then you can survey those people.

Back to Kelly's comment about the red snapper, yeah we're glad to finally see red snapper off North Carolina. They're not where they used to be in the 80s; they're probably maybe 10% of that. I know Florida has a lot more so I guess as take has been reduced down there, they're rebuilding, they're moving north in our areas so we do see schools of smaller red snapper now. It's way from where it used to be. It's a very difficult thing to manage a fishery over four different states and how many thousand miles; that is for areas that are going to have different rebuilding programs or timelines with getting the fish back, that type of fish.

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January 13, 2023

John Hadley

Fishery Management Plan Coordinator & Fishery Economist
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

RE: Snapper Grouper Amendment 46 (recreational permitting & reporting)

Dear Mr. Hadley,

Coastal Conservation Association (CCA) appreciates the opportunity to comment on Snapper Grouper Amendment 46 options for private recreational vessel permits to fish for snapper grouper species and to revise private recreational reporting requirements.

CCA has long supported the concept of recreational fishing licenses to better define the universe of participants and improve accountability and reporting for recreational harvest. We believe that licenses are key to better understanding the economic potential of the recreational sector and to providing socio-economic information which, ideally, would be used to base fishery management decisions for the vast portion of the public that participates in marine fisheries.

The need for improved recreational data is a hot-topic issue in the South Atlantic and the Gulf of Mexico, but it is critical to point out that the recreational sector has supported these efforts for decades and the results to date from NMFS have been disappointing. In almost every instance, recreational anglers were the driving force to improve their own data and they have been frustrated by the lack of a cohesive plan to utilize it properly. Compounding that frustration, in some aspects of the federal fisheries management system the recreational sector is often portrayed as almost defiantly unaccountable and as a problem to be controlled rather than as partners with which to collaborate. The end result is that while anglers most certainly see the need for better data, they are growing suspicious of efforts like A46 that propose yet another permitting process without any indication that it will be any more acceptable or useful than previous federal efforts.

A cursory review of relevant and relatively recent events across the nation shows the extent to which recreational data problems have been identified repeatedly and yet no satisfactory, systemic solution has been presented:

Summer Flounder

- **1991** – is declared overfished. Quality of recreational data in the fishery called into question.
- **2000** - National Resources Defense Council sues NMFS over summer flounder quotas. Anglers demand better data as it is discovered that some MRFSS estimates are driven by single intercepts.
- **2008** - State of New York sues NMFS over MRFSS claiming that state-level allocations that harm the state are based on flawed data.
- **2010** - Senator Chuck Schumer (D-NY) demands MRFSS be scrapped. Letter signed by scientists and state directors states, "Closures based on fatally flawed data have deep and broad economic consequences."

Black Sea Bass

- **2009** – Mid-Atlantic black sea bass closure based on unsure science. Anglers demand a survey that is actually useful for management.
- **2017** – The black sea bass debacle ongoing. New York State managers write letters to the Mid-Atlantic Council complaining about the poor-quality MRIP data being used to take drastic management action.

Gulf Red Snapper

- **Late 1990s** – the Gulf red snapper debacle begins in earnest, with tighter regulations and shorter seasons impacting rec anglers. Quality of recreational data comes into question.
- **2006-2017** – Gulf red snapper debacle intensifies. Progressively shorter and shorter seasons, culminating with a three-day season in 2017. Gulf states go largely non-compliant with federal regs. Anglers demand better data.
- **2013-2016** - Gulf States begin development of independent surveys for reef fish. Angler-funded response to NMFS inaction - Alabama Snapper Check, Louisiana LA Creel, Florida Gulf Reef Fish Survey (now State Reef Fish Survey) and Mississippi Tails 'n Scales.
- **2014** - Louisiana expands LA Creel to all species, fires MRIP. Fed up with drastic management action based on unsure science, Louisiana goes the way of the West Coast to improve reporting time and estimate precision. Angler funded.
- **2017** - Gulf Amendment 50: State Management. Due to lack of confidence in federal data, responsibility for private boat recreational data collection and management delegated to Gulf States. Rec angling fees pay for better data and state reporting systems widely supported by anglers.
- **2017 - 2018** - MRIP certifies LA Creel, Alabama Snapper Check, Mississippi Tails N Scales, and Florida Gulf Reef Fish Survey. Angler funded; license-endorsement based. Provides high-precision, in-season estimates that MRIP cannot.
- **2020** - NMFS insists that Gulf state level estimates must be made equal to MRIP estimates. State surveys are widely viewed as better data collections - more timely

and higher precision. National Academy of Sciences disagrees with NMFS calibration strategy.

South Atlantic Red Snapper

- **2009** - South Atlantic red snapper - Amendments 17a, 17b and 18 consider closures based on suspect, imprecise red snapper harvest numbers. Still ongoing and closures still threatened.
- **2010** - Massive red snapper bottom closure threatened in South Atlantic. First stock assessment declares stock overfished using very low-precision MRFSS data. Anglers call for better data collection.
- **2022** - South Atlantic red snapper closures under consideration again. Successful recovery but suspect discard data indicates stock may still be overfished. Anglers demand better catch and discard data.

West Coast Fisheries

- **1998-2002** - West Coast groundfish disaster. Nine stocks are declared overfished. Rebuilding plans implemented with major shelf closures. MRFSS data is found to be imprecise and delivered on the wrong time scale. Anglers and states demand change, and West Coast states develop their own recreational angler surveys.
- **2004** – West Coast states ask NMFS for basic changes to MRFSS surveys. NMFS refuses, and West Coast states “fire” NMFS and MRFSS from the recreational data collection process entirely.

Federal Legislation

- **1996** – The Sustainable Fisheries Act (SFA) Passes, putting sideboards on stock recovery and demanding action for overfished stocks. The Act pushes councils towards in-season quota and anglers call for better data to meet the needs of the Act.
- **2006-2007** – Magnuson-Stevens Act (MSA) passes. Forces drastic action and short rebuilding timelines, eliminates management flexibility. A complete redesign of MRFSS is ordered to meet management needs. Requires angler license frame. States are given the choice of either developing an acceptable recreational license system or using the federal registry. Virtually every coastal state eventually develops its own recreational licensing system.

MRFSS to MRIP

- **2008** - MRFSS begins producing annual implementation plans in a partial response to MSA. Redesign plans are mostly outreach. Constituent drumbeat for better data reaches a crescendo. NMFS conducts extensive “listening sessions” with recreational stakeholders.
- **2010** - MRFSS rebranded as MRIP in response to MSA, but though millions of dollars are spent, there is no real change in precision or timeliness of data.

National Academy of Sciences Reviews

- **2006** – First National Academy of Sciences review of MRFSS finds it to be fatally flawed for in-season quota management of the sort demanded by SFA and MSA, and nearly useless for rare-event or offshore species. Lays out recommendations for improvement.
- **2017** – Second National Academy of Sciences MRIP review finds MRIP still not acceptable for in-season quota management and still too imprecise for reef fish and other offshore species.
- **2021** - Data Management Strategies for Recreational Annual Catch Limits, another National Academy of Sciences review, concludes that MRIP is not suitable for in-season quota monitoring. It finds no real changes in precision across important species.

This is by no means a comprehensive list and is only meant to demonstrate that recreational data issues are not new. Federal managers have long been aware of systemic problems in federal recreational data collection systems, first with MRFSS and now with MRIP, and yet here we are again grappling with the same issue in Amendment 46. Millions of dollars have been spent “improving” the federal data system, and yet the South Atlantic Council is debating a new permit to address the same fundamental recreational data problem that the Mid-Atlantic Council faced in 1991. In every region, except the West Coast which seems to have successfully divorced itself completely from federal recreational data systems, federal fisheries find themselves caught in a seemingly endless loop of the same predicaments over recreational data, with no end in sight.

CCA is committed to the concept of licenses to better define the universe of recreational anglers and improve recreational data and accountability, but the body of evidence indicates that permits alone will not solve the problem. How the federal government gathers data from the recreational sector and how it manipulates and uses those data in management are huge factors in the efficacy of a recreational permit, and for at least the last three decades the federal government has failed those functions. It is difficult to comprehend how a new permit for anglers in the South Atlantic snapper grouper fishery will introduce data into a federal system that the National Academies of Science has found deficient three times since 1991 and produce a different, satisfactory result.

If there is a lesson to be learned in the events listed previously, however, it is that recreational permits are most effective when the role of the federal government is diminished to the greatest extent possible, and the states are given the greatest control and responsibility over the recreational fishery. The West Coast effectively solved its recreational data problems in 2004. The Gulf States were on track to solve most of the recreational data problems in the red snapper fishery in 2017 until NMFS insisted on calibrating state data back to its own MRIP data with a calibration method that the NAS concluded was ill-suited for the purpose.

It is CCA's belief that the only realistic chance that a permit for recreational anglers in the South Atlantic snapper grouper fishery will succeed in the applications for which it is intended is if the states are given complete authority for administering the program.

States are responsive to anglers and tend to treat recreational anglers as clients because recreational license expenditures and excise taxes on equipment and fuel support their management activities. That engenders a trust and a willingness to work with the data collection and regulatory arms of the states that benefits data quality and compliance. To the second point, states can elect to keep angler permit funds from disappearing into a general fund and instead may direct those funds to specific programs like enhanced data collection, enforcement, infrastructure investments or stock enhancement. The federal government cannot. Additionally, states are much more efficient and frugal with stakeholder funds. As proven through the federal experience with administering a saltwater license, the states could make money on their license programs, charging similar fees, while the federal system never broke even. Finally, many anglers are concerned, and rightly so based on comments from NMFS staff in the region and many commercial and for-hire organizations, that a federal boat permit is the first step in limiting recreational entry to public fisheries. Limiting entry is a non-starter for state managers, recreational anglers and the recreational fishing industry.

CCA is confident that a properly constructed permit for snapper grouper anglers in the South Atlantic could provide information critical to improved management of the fishery. However, the federal government's track record of recreational data-gathering and management indicates that such a permit should be administered and run by the South Atlantic states. While such a system is not a panacea to the problems that continue to plague recreational management at the federal level, state control of data gathering at the very least would provide a check and balance to federal use of both the data and the permit itself.

Regards,

A handwritten signature in black ink that reads "Bill Bird". The signature is written in a cursive, flowing style.

Bill Bird, Chairman
CCA National Government Relations Committee Chairman

First Name	Last Name	City	State	Sector	Comment
Ian	Schurman	St Augustine	Florida	Private Recreational	I do not support amendment 46. There should never be a federal permit for recreational state anglers. There is plenty of ways to collect information that doesn't require restrictions to anglers.
Michael	Mathis	Orlando	Florida	Private Recreational, For-hire	I believe that we should not take away our rights to fish how we want!This will not help the fishery!! everything will remain the same!The only people it will hurt is the people trying to make a living of an affective way to fish!
Tanya	Ebersole	DeLand	Florida	Private Recreational	Sounds like another way to tax fishermen. And if these permits and education are not charged to the fishermen then it's being charged to all tax payers. We don't need more taxes, more Government spending, and more Government Regulation. So far with fishery mis-management you've created such an over-abundance of Red Snapper that they're eating all the other fish and it's impossible to fish without catching them. Mother nature will take care of it just fine if you'll stop trying to manipulate her.
					<p>2) SGAP member and past chairman</p> <p>3) SEDAR participant</p> <p>4) ORCS workshop participant</p> <p>5) Dolphin Wahoo AP</p> <p>6) Electronic monitoring workshop participantAfter numerous SEDAR's including 17, 24 and 41 for Red Snapper it is apparent what we are doing is not working.</p> <p>The inability to collect data and accurately assess stocks especially those that are closed is an ongoing problem.</p> <p>The inability of MRIP to accurately capture effort and discards for the recreational sector is an issue that will never be resolved under the current management plan. My proposal may seem extreme but what we are doing isn't working.Step 1) - South FL needs to be its own management area: The fisheries habitat and species of concern are vastly different than the rest of the SA. On the Atlantic side, from Jupiter to the Gulf, to Ft. Myers should have its own management plan. Commercial and for-hire fisherman in this region would change their federal permit from SA to SF (South FL). This also takes care of permit problems.</p> <p>Step 2) - Limited entry for the for-hire sector: SGAP recommendation: Unanimously supported by all members. With electronic reporting becoming a reality this sector will be monitored and managed effectively. This sector needs to be removed from MRIP.</p> <p>Step 3) - Sector separation: With the different needs and goals of each sector this makes sense. Allocation could be based on landings and participation. This would allow Charter operators to determine how to manage their ACLs.</p> <p>Step 4) - Federal Reef fish stamp - SGAP recommendation: We must identify which salt water anglers are fishing or intend to fish for reef fish.</p> <p>Step 4a) - Federal deep water complex stamp: SGAP recommendation: We must identify which salt water anglers are fishing or intend to fish for deep water species.</p> <p>Step 5) - Federal recreational reef fish season: This is tough; but, what we are doing is not working. A season would allow (in addition to the changes listed above) much better coverage and monitoring of recreational effort. The result would give the managers the ability to turn some of the dead discard numbers into landings. It would seem this is a no brainer. I believe recreational anglers would support this if the benefits were explained.</p> <p>After sitting through SEDAR 41 at all stages (DW workshop through RW) it is apparent some of the assessment issues are unresolvable under the current framework. People do their best at all stages but the end result is a product that very few have confidence in. The above suggestions, while not perfect, would put us on a better path making sure we have re-built sustainable fisheries for the future.</p> <p>Sincerely Captain Robert Johnson Owner/Operator Federally Permitted For-Hire and Commercial Vessels: 1980 Present</p>
Robert	Johnson	St. Augustine	Florida	Commercial, For-Hire	
Ted	Venker	Houston	Texas	Non-Govt Org (NGO)	Please find attached (emailed) comments from Coastal Conservation Association on Amendment 46 (recreational permitting and reporting). Thank you.
					<p>First of all, I strongly support the implementation of a permit. Normally I would support a state by state permit, but living here in NC, I do not have the confidence in the State to manage fisheries. So I am perfectly fine with a Federal Permit. There should be a fee.As to the issues raised by the SA, I will respond below.</p> <p>The permit be issued to an individual angler?</p> <p>All species within the snapper grouper complex.</p> <p>I have no comment on the education component-I am fine with all of the options.</p> <p>It should be implemented immediately, so we can get the better data on these species. If better data show a stock is in trouble, we should curb it sooner. If better data show a stock (like red snapper) are in better condition, then we should relax some rules.</p>
Chris	Elkins	Gloucester	North Carolina	Private Recreational, Non-Govt Org (NGO)	
Scott	Hansen	DeLand	Florida	Private Recreational	Inappropriate response by SAMFC to what I see as flimsy data. As any offshore angler from Jax to Miami will attest, our reefs and wrecks are absolutely infested with ARS. The rationale behind red snapper decisions hold little water and do not make sense to the public, especially as anglers can catch literally hundreds in a day and have to weed through dozens of ARS just to catch a couple other species. I have to assume that there's been very little stakeholder consideration, as nearly every recreational, for hire, and conservation organization is opposed to this-and these are often the same people that speak out in FAVOR of fishery closures that make sense, myself included.
					<p>I struggle to understand any reason to even entertain granting more authority let alone the necessary funding to create a tax on recreational anglers in the guise of a "permit" for grouper snapper species, when this same body has demonstrated an utter lack of competency with regards to the ARS situation. Seeing the consequences of letting the SAFMC get their claws into just that one species, no I do not support further bureaucratic pseudoscience across any additional species in the fishery.</p> <p>I fish frequently and dive/spearfish these waters. The very apparent OVER population and absurd policy decisions around red snapper in my local waters does nothing but increase pressure on the other species on the bottom and to the detriment of red snapper. Allowing fishermen to put fish in the box and go home is surely a more sensible approach to eliminate by catch/barotrauma/mortality issues. If a boat catches nothing but red snapper while trying to catch muttons/mangos/grouper the reasonable person would come to the conclusion that perhaps allowing red snapper to be caught would prevent bycatch mortality, while also allowing the remaining and less prevalent species to go unmolested.</p>
Wesley	Graham	St. Augustine	Florida	Private Recreational	
Erin	Wirtz	Davie	Florida	Private Recreational	By turning the recreational fishery into a federally permitted system, you would be marginalizing the fishing community and creating criminals out of people who occasionally fish. It would deter both new and existing fishermen from angling, and create a further divide between the outdoorsmen and the government. By requiring a permit to catch popular fish, ESPECIALLY if this permit costs money, you are making fishing significantly less accessible for all parties. This seems like major government overreach and a scheme to generate more revenue. Requiring a permit to catch snapper would have zero effect on how many snappers are safely released. Spend more time educating anglers, and potentially require a safe handling/releasing course prior to purchasing a fishing license, but don't create a federal permit to catch the (arguably) two most popular fish in the southern waters.