SUMMARY OF Red Snapper Related SCOPING COMMENTS

Prepared by Rick DeVictor, SAFMC Staff

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I. Summary

The Council/NMFS solicited scoping comments on Snapper Grouper FMP Amendment 18 beginning April 7th, 2008 to address management options for red snapper. The comment period ended on May 16th. Five scoping meetings to initiate the scoping process were held in May 2008 (Table 1). Earlier in the year the Council also held scoping meetings for Amendment 17 which included red snapper at the time. Note: all actions addressing red snapper issues have since been moved from Amendment 18 and Amendment 17 to Amendment 17A. A notice of intent to prepare a draft environmental impact statement was published January 22, 2008 [73 FR 3701]. Four public scoping meetings to begin the scoping process were held in February 2008 for Amendment 17. The table below outlines the attendance at each meeting. The Council received numerous written correspondences in the form of letters, faxes, and e-mails. This document presents a general overview of the comments received from commercial and recreation fishermen, environmental organizations, and fishing organizations. It does not intend to provide a detail report of all the comments and viewpoints received.

Table 1. The number of attendance cards completed for those individuals indicating the desire to provide comments on Amendment 18. **Date**	**Location**	**Attendance Cards**
2/4/2008	Coconut Grove, FL	15
2/5/2008	Cape Canaveral,	40
2/6/2008	Brunswick, GA	13
2/7/2008	New Burn, NC	16
5/7/08	Key Largo, FL	*
5/9/08	Port Canaveral, FL	40
5/12/08	Pooler, GA	45
5/13/08	Charleston, SC	19
5/15/08	New Bern, NC	17

II. Summary of Comments

The majority of comments on Amendment 18 could be broken into three broad categories: (1) the belief that the data and assessment results do not accurately reflect the true condition of the stock; (2) the need to respond to the assessment results by ending overfishing as soon as possible, implement a rebuilding plan, and minimize landings and discards; and, (3) suggestions for changes to the regulations.

Data and Assessment Results Not Accurate of True Stock Condition

Many fishermen did not believe that the stock assessment results (undergoing overfishing and overfished) accurately represented the condition of the stock based upon their

encounters with red snapper. Many reported an increase in the number and size of fish in recent years. As such, some fishermen concluded that the recreational limits of 20 inches and 2 fish per person per day are sufficient to enable a sustainable population. Fishermen commonly raised issue with the current method to collect recreational data and the levels of uncertainty around the data.

The Need To End Overfishing and Other Measures

The Ocean Conservancy recommended that Amendment 18 end overfishing immediately, achieve optimum yield, incorporate appropriate buffers to ensure that overfishing is prevented, count and minimize bycatch, and protect essential fish habitat areas in the South Atlantic. They recommended that the amendment also include measures to reduce the fishing mortality rate below that associated with a moratorium on landings. They recommended that management measures include, but are not be limited to: limiting fishing effort, time and area closures, trip/bag or vessels limits, and caps on total mortality or hard total mortality limits (not just hard total allowable catch limits).

The Marine Fish Conservation Network was concerned with the use of T-Max as a rebuilding timeline and suggested that the target be set more along the lines of T-Mid.

The Florida Coastal and Ocean Coalition recommended the amendment: end overfishing immediately, achieve optimum yield, incorporate buffers in catch levels and quotas that are set to ensure that overfishing is prevented, rebuild red snapper populations as soon as possible, minimize and account for bycatch in the snapper grouper fisheries, and protect essential fish habitat in the South Atlantic. In addition, the group supported the consideration of various

issues, including measures that aid in enforcement (specifically, vessel monitoring systems), time-area closures aimed at protecting various vulnerable life-history stages of red snapper, and a broad range of options for rebuilding red snapper within an appropriate timeline with high degree of success.

Management Regulations

The public suggested various changes to the regulations for Amendment 18 (Table 2). Many fishermen did not support a closure of any kind for red snapper. They believed that the closure would have significant economic impacts (particularly to the for-hire sector), did not believe that a closure was warranted, and felt that it would increase the current discard mortality level. A significant number of fishermen supported an elimination or reduction in the current 20 inch minimum size limit in order to reduce the mortality of undersized fish. Some members of the public emphasized that bycatch is a significant source of mortality and future regulations should minimize bycatch. They recommended measures that will reduce the incidental catch of red snapper including, but not limited to: time and area closures, a network of marine protected areas, trip or bag limits on co-occurring species, caps on total mortality, and gear modifications. One fisherman was concerned that overlapping closures (such as those for gag and vermilion) could increase the amount of incidental discards. This individual recommended a total closure on snapper grouper species, for as short as possible.

One commercial fisherman stated that if he begins to catch 17 or 18 inch red snappers in an area then he realizes that most of the fish in the school are this size and he moves away. However, if the size limit were decreased he would harvest those fish.

Table 2. Recommendations from the public concerning red snapper regulations. Size limit (most did not indicate whether they were speaking to the commercial or recreational limit)	Retain 20” size limit
	18”
	16”
	No size limit
	No commercial size limitbut implement a quota
Recreational Bag limit	Retain bag limit (2)
	Bag limit=1
	Bag limit of 0 for captain and crew