Kate Mitchie
NOAA Fisheries Service
Southeast Regional Office
Sustainable Fisheries Division
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Madison L. Howard
Owner – Reel Commitment Fishing
808 Tarpon Drive
Wilmington, NC 28409

March 25, 2010

Dear Kate,

I am writing in response to the request for comment on a Draft Environmental Impact Statement for South Atlantic Snapper Grouper Amendment 17A – to address over fishing of red snapper in the South Atlantic. I received this request through the Southeast Fishery Bulletin dated March 8, 2010. I am completely shocked that there is even more action being considered on the South Atlantic Snapper Grouper fishery after the incredible of number of changes already in place for 2010 – **I have not been able to fish within this fishery this year** – truly more changes to the amendment can not protect the fishery more than keeping the commercial (not to mention recreational) fishermen on dry land!! I am further distressed since Red Snapper in North Carolina in 2009 were the most numerous I have seen in over 10 years. Specific actions being considered and my comments are below:

- ACL and accountability measures for South Atlantic red snapper

Eliminate the existing temporary moratorium – the fishery for red snapper is already closed through June 2010 with a warning that it will be shut down all of 2010. Measures neither are necessary nor are the restrictions needed.

- A rebuilding plan for red snapper

2009 was the strongest red snapper year I have seen in over a decade – I would suggest that the current restrictions are effective and working.

- An area closure for red snapper

I think closure areas should be in depths greater than 100 fathoms - I am a rod and reel snapper/grouper fisherman – area closures are not necessary in shallow waters since I have always seen red snapper respond strongly after immediate release. Other measures may be effective for deep water is not necessary for shallow water – there needs to be recognition that there are shallow water fishermen commercially participating in the South Atlantic Snapper Grouper Fishery.

- A requirement for circle hooks in the snapper-grouper fishery north of 28N latitude

I am a rod and reel fisherman – red snapper are an aggressive fish which does not ingest J-hooks due to their relatively small mouth, snapping bite (they are not "gulpers"). The measure may be necessary for Miami type gear in deep water over 100 fathoms – making its use gear specific may help with enforcement for recreational/commercial fishermen.

In summary, I believe there are already very restrictive, yet to be proven changes underway in the South Atlantic Snapper Grouper Fishery – these changes have not been allowed to have even 1 year's worth of effect to be observed. Further changes are simply not necessary and do not recognize that fishery populations simply do not change dramatically year to year.

Sincerely,

Madison L. Howard
Owner/Operator
Reel Commitment Fishing