Amendment 17A Draft Environmental Impact Statement (DEIS) Comment Summary
April 2010

In total, thirty six written comments were received from various fishermen, environmental groups, and state and Federal entities, during the 45-day Amendment 17A DEIS comment period. Twenty-nine commenters were opposed to some or all actions in Amendment 17A, and four commenters were generally supportive of Amendment 17A but suggested more conservative measures be taken. Three townships and one county, all in South Carolina, submitted resolutions to the agency opposing the proposed implementation of the closed area.

Action 1. Maximum Sustainable Yield (F_{MSY}) Proxy for red snapper

- Two comments recommended the preferred alternative for the F_{MSY} proxy be changed from $F_{40\%SPR}$ to $F_{30\%SPR}$.
- Three comments recommended adoption of the current preferred F_{MSY} proxy using $F_{40\%SPR}$.

Action 2. Red Snapper Rebuilding Plan

- One commenter recommended the Council change their preferred alternative from a 35 year rebuilding schedule, to Alternative 3 (25 year rebuilding schedule). The same commenter recommended the Council change their preferred rebuilding strategy alternative to Alternative 4 (65%F_{MSY}).
- Another commenter also indicated the preferred 35-year rebuilding schedule was too lengthy and a shorter rebuilding schedule should be chosen.
- One commenter recommended that, wherever possible, some additional risk should be accepted in developing the rebuilding plan, possibly by using $F_{rebuild}$ in projections and accept projections that achieve the minimum allowable chance of rebuilding the fishery by 2044.
- Two commenters stated the current preferred alternative for red snapper accountability measures was inadequate and should include some action that would be triggered if and when an ACL overage occurs.

Action 3. Management Measures

- One commenter recommended adopting the smallest possible area closure that has a reasonable chance of ending overfishing.
- Two commenters felt that the Council should adopt contingent actions to reduce the area further if the 2010 stock assessment indicates that additional fishing mortality can be accommodated without overfishing.
- One commenter opposed the exemption for spearfishing within the proposed closed area.
- One commenter recommended the Council choose as a preferred alternative, the exemption for fishing with black sea bass pot gear within the proposed closed area.
- Two commenters recommended the Council choose a larger area closure as a preferred alternative.
- Two commenters were concerned the proposed area closure will shift fishing pressure toward species managed exclusively in state waters, or areas of juvenile habitat.

- Twenty six commenters were generally opposed to any area closure for snapper grouper species. Most cited potential negative socioeconomic impacts to shore-side businesses and fishing operations.
- Three commenters felt it was unfair that the States of North Carolina and South Carolina were not included in area closure, while Georgia and Florida were.

Action 4. Require the use of non-stainless steel non-offset circle hooks in the snapper grouper hook and line fishery north of 28 degrees latitude.

- One commenter cautions NOAA Fisheries Service not to rely on assumptions regarding red snapper mortality reductions based on use of circle hooks.
- Two commenters support the required use of circle hooks north of 28 degrees latitude.
- Two commenters oppose the circle hook requirement.

Action 5. Establish a red snapper monitoring program

- Four commenters support a fishery-independent monitoring program for red snapper.
- One supporter of the preferred monitoring program alternative recommended a portion of the ACL be set aside for research-related mortality.
- One supporter of the preferred monitoring program recommended an additional effort to improve recreational catch data and fishery-dependent information.

Comments on other issues

- Eleven of the commenters cited “flawed data” as their main reason for opposing the actions contained in Amendment 17A.
- Two comments submitted by the same commenter requested for-hire and commercial fishermen be bought out by the federal government.
- One commenter felt the Council and NOAA Fisheries Service were conducting inadequate outreach regarding actions in Amendment 17A, which as lead to public misperceptions of potential impacts of the amendment.
- One commenter requested a larger discussion of the potential effects of the new SEDAR 2010 assessment on actions proposed in Amendment 17A.