Introduction

My name is Greg Clifford, and I am President of the Sebastian Inlet Sportfishing Association (SISA). I live and fish on the East central coast of Florida as a recreational angler. Our sportfishing organization along will all of the other recreational sportfishing organizations in our region have recognized the injustice of the Red Snapper closure in our area and have solicited thousands of citizens on petition to bring this issue to light. However, the SAFMC blindly continues on a course to close the Red Snapper fishery based on flawed science and politically motivated individuals with absolutely no direct stake in the natural resource.

The state of South Carolina has already proposed legislation rebutting the methods of the NMFS and magically their state is no longer critical to the rebuilding of the Red Snapper. Grass roots pressure will be brought to bear on the State of Florida as well in the coming months. There's an old saying, "Figures don't lie but liars figure". Can the NMFS risk their credibility and be perceived as liars? What damage will this due long term to fisheries management in the long term? These are the questions our Federal Fisheries Managers should be asking themselves and not which closure options are best for Red Snapper, which is truly not over fished.

Comments on Draft Environmental Impact Statement (DEIS) for Amendment 17A Red Snapper

The entire basis of the DEIS is founded on flawed science that the Red Snapper stock is over fished, and therefore conclusions derived from the analysis contained within the DEIS are unfounded. The Red Snapper stock is plentiful in the region under consideration and has been shown to be rebuilding since 20" size and catch limits were put in place. The recent scientific assessment of the stock is clearly misguided and risks total lack of confidence by those with first hand knowledge of the fishery. Despite these in situ testimonials and presentations at past meetings, this evidence has been ignored and is indicative of a governmental agency pursuing a collision course with those they are representing. I urge the NMFS, NOAA and the Department of Commerce to recognize the failure of the SAFMC and remove those members that have proposed to continue on the path of using fatally flawed science in the decisions to manage the Red Snapper fishery.

-I oppose any changes in the Red Snapper regulations until such time as there is reliable data to upon which to base any changes.

-The stock assessment and historical data are based upon a failed attempt to determine the stocks of Snapper before 1980.

-Due to the fact that there is no reliable data before 1980, the baseline date for stock assessments for Grouper/Snapper must be reset to 1980 instead the arbitrary date of 1945, and a new assessment must be done before any regulations can be implemented. In addition, the release mortality rate was increased by over a factor of 3 without any scientific justification or tagging recovery program to support this drastic change.

-Dr. Frank Hester has proven there exist flaws in the assessment and the Council must act upon this new information that he has provided and reassess the stocks accordingly.

-Professors Waldner and Chesnes of Palm Beach Atlantic also reviewed the assessments concluded that the estimates were wrong and stated that the NMFS has no idea of the historic population of Red Snapper.

-The 7 to 6 vote on the interim rule shows that there are many questions as to the nature and effect among the Council members and no overwhelming consensus to enact such a draconian and unprecedented closure.

-Council members cannot enact such a far reaching measure based upon information that is admitted to be flawed is irresponsible.

-The closure will shut down the charter fishing fleets and cause loss of jobs in marinas, bait shops, restaurants etc. There has not been an economic impact study done for the South Atlantic. The current study extrapolates information from 2 boats in 1 port in the panhandle to the entire South Atlantic region.

-In the State of Florida in according to the Florida Wildlife Commission in 2008 Saltwater fishing generated $3,141,005,027 in retail sales, generated $326, 166,528 in sales taxes, had a total economic impact of $5,369,293,552 and creates 54,508 jobs. This economy will be severely impacted by this closure.

-I support the use of circle hooks and venting tools to reduce mortality. This reduction in mortality will further strengthen the stocks.

-I support independent, in situ, peer reviewed, scientific research for all species prior to regulation enactment.

-I support the limitation of commercial take or commerce of any fish specie that is scientifically determined to be not sustainable prior to restricting recreational access to the fishery.