March 19, 2010

Kate Michie
NOAA Fisheries Service
Southeast Regional Office
Sustainable Fisheries Division
263 13th Ave. South
St. Petersburg, FL 33701-5505

Dear Ms Michie,

My name is David C. Werner of Melbourne, FL. I am the former Secretary and current Webmaster for the Florida Sport Fishing Association (FSFA) headquartered out of Cape Canaveral, FL. www.fsfaclub.org I have been a member since 2000.

I have attached a study/position paper about the condition of the Red Snapper fishery off Florida's central east coast. The basis of this study is a point fishing results database maintained by the club for the last 42 consecutive years. Be patient when stepping through the material, I had to spend a few pages up front to explain what led to the information.

The purpose of the study is to add some actual data driven information from a different source on the subject, not just more anecdotal input from disappointed anglers.

The FSFA's primary objectives are to promote recreational fishing, educate the public and preserve and even augment the underlying resources.

If we felt and saw evidence of the Red Snapper population being in trouble, we would be among the first to request action. However, as you will see from the study, the fishery at least off the coast of Florida from Ponce Inlet south to Sebastian Inlet is already recovered and thriving. I am not sure where the data came from that suggests the proposed Amendment 17A closures are required to protect the fishery, but that conclusion is grossly inaccurate. The FWCC about eight (8) years ago reduced the Atlantic coast limits to two (2) fish of 20" minimum length. That change, plus perhaps a natural recovery cycle, has led to a state where the ARS fishery is extremely healthy in terms of both numbers and size. It is in the best shape it has been since the early 1970's as born out by anyone you might ask up and down the region who deals regularly with the resource. We are not making this up; there is no shortage of club members available and eager with virtually zero notice to show you personally just how strong it is … it is that good!

Please take a look at the study. The data terms, collection methods and even the demographics of those who input to the system are unchanged for 42 consecutive years. The data is factual, non-contrived and unmassaged. I will gladly provide you with the native MS Access database itself if you request it.

I realize your organization has a very daunting task trying to sort out and implement steps to help protect and preserve our marine resources. I have only a very slight idea perhaps of the pressures you deal with from across a wide spectrum of interests and from government regulations of course.

However, whatever has led to this proposed bottom fishing closure has somehow omitted input from those the closest to the real condition of the fishery and has thereby missed the boat. We just do not understand the need to close down a thriving recreational (and commercial) fishery in the name of protecting it. Why do that? Don't we have much better things to do? How can we trust those forcing this upon us?

I'm just a tax paying citizen who happens to enjoy recreational angling and who is part of an organization comprised of 450 or so like minded folks. But I can tell you that in my 68 years of life, I have never seen anything close to the growing, very evident feeling of distrust amongst virtually all of my acquaintances and peers of those who make and implement the rules and regulations concerning our natural resources. It is too bad really, for I am sure that a host of messengers are being improperly targeted, but they should not be surprised. Somebody in a position of authority needs to step up and say; "Are we going to allow such drastic rule changes impacting so many people to become effective without a more thorough look of what is 'really' the case?" Meeting an artificially mandated deadline for action is not an excuse for implementing such draconian steps.

Respectfully submitted,

David C. Werner
FSFA Webmaster www.fsfaclub.org
3785 Long Leaf Drive
Melbourne, FL 32940
321-752-9955
dwerner7@cfl.rr.com

FSFA and the Red Snapper Ban

Florida Sport Fishing Association (FSFA)
PO Box 1216
Cape Canaveral, FL 32920

Established 1968, Membership >210 Families

www.fsfaclub.org

February 01, 2010 - Dave Werner, Club Webmaster

Preamble

- The federal Magnuson-Stevens act mandates that as a particular fishery is deemed "overfished", actions must be initiated within short time limits to protect and enable a recovery of that fishery.
- NOAA, the NMFS and, in our case, the SAFMC are charged with finding/developing and examining science & data to determine the status of a given fishery.
- They are further charged with recommending and implementing actions, subject to approval by the Dept of Commerce, to protect said fishery.
- Based on the data collected and reviewed, the SAFMC recommended and implemented, interim for 6 months (& planned permanent for years), a complete ban on commercial and recreational take of Red Snapper from the Carolinas to Vero Beach, virtually 100% of the species Atlantic range.
- Said data was and is admittedly incomplete and extrapolations were made to fill gaps, with the resulting conclusion being that the fishery needed immediate closure, despite loud voices to the contrary that it was healthy and recovering.
- The FSFA has data from the last 42 years that does not support such a conclusion and is bringing it forward for review and comparison.

Objective of This Presentation

- Introduce the FSFA as a source of relevant catch data, and why.
- Explain the data history, content, source, purpose and validity.
- Summarize the data, first in terms of the total angling results for all eligible species for each of the last 42 years,
- Then, summarize the data in terms of Red Snapper only results for each of the last 42 years.
- Compare Red Snapper as a percentage of the total, all years and for six year interval block averages.
- List the data supported conclusions.
- Provide photographs of 2009 Red Snapper catches by club members.
- Closing statement and recommendations.

Florida Sport Fishing Association (FSFA)

Please check out our website <www.fsfaclub.org>

- Established in 1968, headquartered in Cape Canaveral
- 501C4 Non-Profit Organization
- Currently at 217 family memberships, ~ 450 individual angling members from the East-Central Florida region
- Primary Club Objectives
  - Support and improve sport fishing awareness and related education
  - Educate citizens about, protect and improve the underlying resources.
- Initiated a comprehensive point fishing program for members as a means to promote the sport, improve member angling proficiencies and recognize the best anglers
- Capture and archive the data, maintain that system as viable every year. Data now serves three generations of club members.

FSFA Data on Atlantic Red Snapper

- Data is 100% from actual event input, all years … no extrapolations
- Data covers the same angling area each year, from Ponce Inlet south past Port Canaveral to Sebastian Inlet, a distance of 90 coastal miles. Area is very representative of the 'continental shelf' from the Carolina's to mid-Florida.
- Data input is consistent every year for 42 consecutive years, same demographic of club anglers, same angling methods, same range of eligible species. Database contains > 15200 individual catch entries.
- Data is used to track individual club angler results, both on an annual competitive basis and for lifetime achievement. Photographs, information sharing and peer pressure/honor system helps ensure data integrity.
- Next, let's look at some hows and whats of this "points" system …

Reference: www.fsfaclub.org/point fishing tab

FSFA 'Point' Fishing Database

- Records with many data fields on sport fishing catches within the area (date, angler, species, weight, tackle class, location, bait or lure are key fields)

- FSFA Member anglers submit their qualifying catches year round via an On Line Point Entry (OLPE) system. Input is via email. The MS Access database is updated by an administrator for each entry. A shadow database is maintained by a separate administrator for integrity & continuity.

- Has recorded consistent catch data since 1968
  - 15229 separate system entries through year end 2009
  - Entry rules and the key data fields unchanged for 42 years,
  - Originally was manual, hard copy driven. Converted to electronic in early 90's (Same rules, simply on-line now, instead of hard copy mail earlier)

- System captures <u>quality</u> catch results by club members for the vast majority of SE Atlantic sport fish species, including of course <u>Red Snapper</u>.

- Now let's look even more closely at this system, including the "points" aspect.

FSFA Point Entry Recording System

- Active since 1968. Recognizes 49 different saltwater and 16 freshwater species. By far the most interest and entry activity is with saltwater species.
- Members submit entries to earn points for quality size individual fish from the recognized species list. Entries are recorded and points are awarded for these catches based on the species, its size and the tackle class used.
- Each entry made reflects an individual angler/tackle class/species event.
- The rules, species, minimum weights & tackle classes have remained the same, necessary for fairness of annual intra-club competition and for individual angler rating validity over the years.
- Each species has minimum qualifying weights necessary to achieve either 10 or 20 points on each of the 6 tackle classes. Point entries are not made unless these minimums are achieved on the angler submission.
- An important aspect … anglers are not rewarded and data entries are not made for volume submissions of the same species & tackle class. Once the maximum of 20 points is achieved per species per tackle class, additional point entries are not recognized for that angler unless he submits that species caught on a different tackle class, submits an outstanding size fish for a club record or periodic award, or submits another species.

FSFA Point Entry Recording System (continued)

- The attributes of "points for quality size fish only" and the "20 point maximum" per year accomplish the following:
  - Anglers are awarded for their ability to catch a range of different species, all of quality size, using a wide range of tackle types.
  - Species diversity, catch quality (size) and angler proficiency with different tackle drive the entries to the database.
  - Database entry volume for any one of the eligible species varies primarily with the number of different anglers having success with that species using any of the six types of tackle.
- Therefore, database entry volume in a given year of a given species reflects the availability of that species, in quality size, to our anglers. Such 'availability' data is very representative of species population.
- The next 2 slides show the species list, tackle classes, minimum point entry sizes for Red Snapper and the spreadsheet of data on overall entries and Red Snapper specific entries, 1968 thru 2009.

List of Eligible Species, Tackle Classes & Red Snapper Weights

Saltwater (49)

African Pompano
Amberjack
Barracuda
Blue Runner
Bluefish
Bonefish
Bonito
Cobia
Dolphin
Drum
Flounder
Black Grouper
Gag Grouper
Kitty M Grouper
Red Grouper
Rockhind
Scamp
Snowy Grouper
Warsaw Grouper
Jack Crevalle
Bar Jack
Ladyfish
Cero Mackerel
King Mackerel
Spanish Mackerel
Blue Marlin
White Marlin
Permit
Pompano
Redfish
Sail Cat
Sailfish
Shark
Sheepshead
Cubera Snapper
Mangrove Snapper
Red Snapper
Yellowtail Snapper
Snook
Spotted Seatrout
Swordfish
Tarpon
Tilefish
Tripletail
Blackfin Tuna
Yellowfin Tuna
Wahoo
Northern Weakfish
Whiting

Freshwater (16)

Largemouth Bass
Striped Bass
Sunshine Bass
Bluegill
Bowfin
Bullhead
Catfish
Florida Gar
Longnose Gar
Pickerel
Redbreast
Shad
Shellcracker
Speckled Perch
Stumpknocker
Warmouth

Tackle Classes (6) and example minimum weights for 10 or 20 point Red Snapper entries

Such minimum weights for 10 or 20 points exist for all of the 65 species listed above

	Fly Rod	Ultra-light	Spin Cast	Plug Cast	Light Gen	General
# Test Line Max	20#	04#	10#	16#	20#	80#
10 pt minimum weight, Red Snapper	3#	3#	4#	6#	12#	18#
20 pt minimum weight, Red Snapper	6#	6#	8#	12#	24#	30#

System Data Spreadsheet

No.	Year	System Entries	No. of Anglers	Number of Red Snapper Entered in System												Total	% of Entries	6 yr block avg %
				Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec			
1	1968	52	16	0	0	0	0	0	0	0	0	0	0	1	1	2	3.8%	3.7%
2	1969	160	50	0	0	0	1	0	0	0	0	0	0	0	0	1	0.6%	3.7%
3	1970	131	31	0	0	0	0	0	0	0	1	6	1	0	0	8	6.1%	3.7%
4	1971	297	47	1	0	0	6	3	10	2	1	0	0	0	0	23	7.7%	3.7%
5	1972	527	73	0	1	0	0	1	0	4	2	2	1	1	0	12	2.3%	3.7%
6	1973	515	51	0	0	1	1	7	4	2	1	1	0	0	0	17	3.3%	3.7%
7	1974	195	37	0	0	1	0	1	1	0	0	0	0	1	0	4	2.1%	1.0%
8	1975	302	45	0	1	0	0	0	0	0	0	0	0	0	0	1	0.3%	1.0%
9	1976	460	53	1	0	0	2	0	1	0	0	1	1	0	0	6	1.3%	1.0%
10	1977	568	66	0	0	0	2	4	0	0	0	0	0	0	0	6	1.1%	1.0%
11	1978	448	48	0	0	0	2	0	0	1	0	0	0	0	0	3	0.7%	1.0%
12	1979	388	38	0	0	1	0	0	0	0	1	1	0	0	0	3	0.8%	1.0%
13	1980	369	45	0	0	0	0	2	0	0	0	0	0	0	0	2	0.5%	1.2%
14	1981	463	39	0	0	1	0	0	0	0	1	0	0	0	0	2	0.4%	1.2%
15	1982	449	46	0	0	0	0	2	2	0	0	1	0	1	0	6	1.3%	1.2%
16	1983	333	48	2	1	0	0	1	7	1	0	0	0	0	0	12	3.6%	1.2%
17	1984	280	45	0	1	0	0	0	0	0	1	1	0	1	0	4	1.4%	1.2%
18	1985	303	46	0	0	0	1	0	0	0	0	0	0	0	0	1	0.3%	1.2%
19	1986	354	44	0	0	0	0	1	0	0	0	0	0	0	0	1	0.3%	0.3%
20	1987	116	25	0	2	0	0	0	0	0	0	0	0	0	0	2	1.7%	0.3%
21	1988	189	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0.3%
22	1989	390	44	0	0	0	0	0	0	0	1	0	0	0	0	1	0.3%	0.3%
23	1990	536	43	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0.3%
24	1991	352	33	0	0	0	1	0	0	1	0	0	0	0	0	2	0.6%	0.3%
25	1992	867	52	2	0	0	0	0	0	3	0	0	0	0	0	5	0.6%	0.4%
26	1993	576	49	0	2	0	0	0	0	0	0	0	0	0	0	2	0.3%	0.4%
27	1994	510	44	0	0	0	0	0	0	1	0	0	0	0	2	3	0.6%	0.4%
28	1995	514	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0.4%
29	1996	541	48	0	1	0	1	0	0	0	0	0	0	0	0	2	0.4%	0.4%
30	1997	557	47	0	0	0	1	0	0	0	0	0	0	0	0	1	0.2%	0.4%
31	1998	503	41	1	0	0	0	0	0	0	0	0	0	0	0	1	0.2%	0.5%
32	1999	323	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0.5%
33	2000	296	25	0	2	0	0	0	1	0	0	0	0	0	0	3	1.0%	0.5%
34	2001	105	16	1	0	1	0	0	0	0	0	0	0	0	0	2	1.9%	0.5%
35	2002	111	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0.5%
36	2003	79	20	0	0	0	0	0	0	0	0	0	0	0	1	1	1.3%	0.5%
37	2004	109	23	1	3	0	0	0	0	1	0	0	0	1	0	6	5.5%	4.1%
38	2005	198	29	0	1	1	0	3	3	1	0	1	0	0	4	14	7.1%	4.1%
39	2006	394	42	2	3	1	0	3	1	0	0	0	0	0	2	12	3.0%	4.1%
40	2007	563	55	2	2	1	1	0	1	1	0	1	0	3	3	15	2.7%	4.1%
41	2008	442	47	0	6	1	0	2	3	0	2	0	0	1	4	19	4.3%	4.1%
42	2009	364	55	7	8	1	0	1	1	0	0	0	1	0	0	19	5.2%	4.1%
	Total	15229	41.2	20	34	10	19	31	35	18	11	15	4	10	17	224	1.5%	
	% of Total		Avg	8.9%	15.2%	4.5%	8.5%	13.8%	15.6%	8.0%	4.9%	6.7%	1.8%	4.5%	7.6%			
	Avg Yr	362.6																

Spreadsheet data sourced from Access database of over 15200 entries submitted by club anglers, 1968 – 2009
System started manual, converted to a database file in the early 1990's

Total Entries per Year

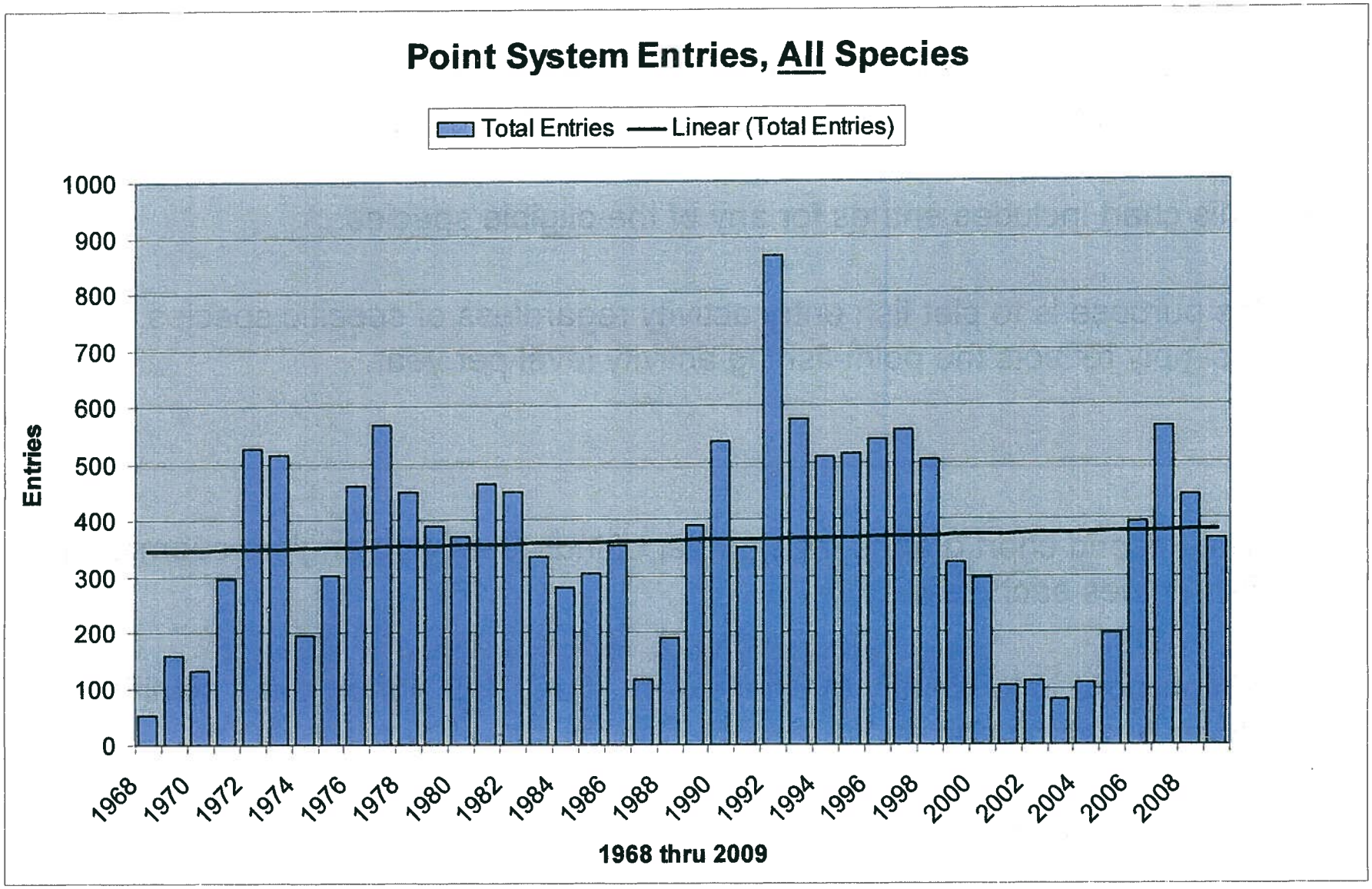
- The next chart graphs the total system entries made per year. Angler points are not part of any of the data, just the fish entries themselves.

- This chart includes entries for any of the eligible species.

- It's purpose is to plot fish entry activity regardless of specific species. It simply reflects the point fishing activity level per year.

- The second chart graphs the number of individual club anglers submitting fish entries each year.

- It's purpose is to identify to what extent, if any, this variable is a significant driver of catch data.

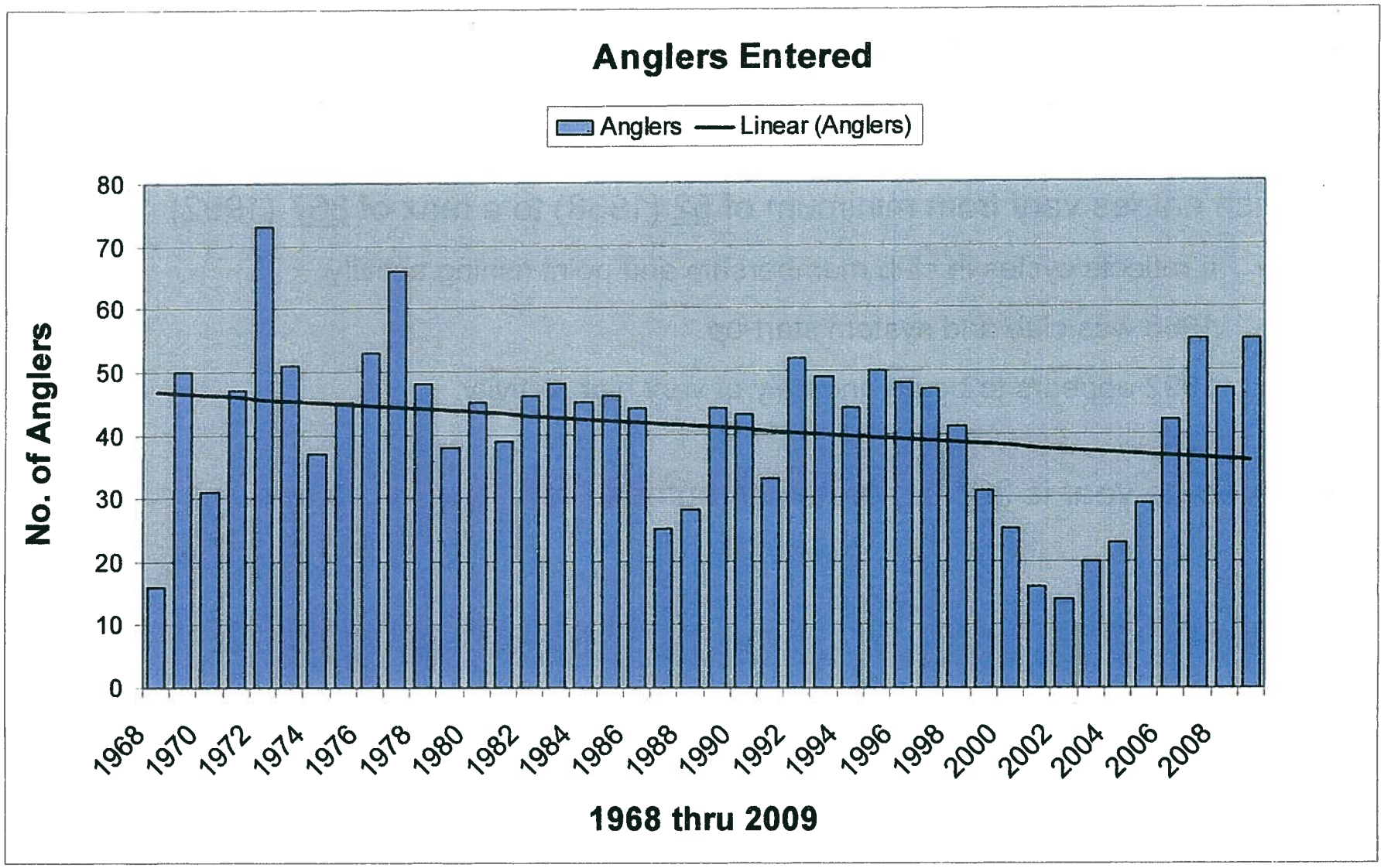

Point System Entries, All Species
Total Entries
Linear (Total Entries)
Entries
1000
900
800
700
600
500
400
300
200
100
0
1968
1970
1972
1974
1976
1978
1980
1982
1984
1986
1988
1990
1992
1994
1996
1998
2000
2002
2004
2006
2008
1968 thru 2009

Total Entries Data Analysis

- In general, a 7 to 10 year cycle of lower to higher activity and return seems to exist, and looks like typical cycles. The linear trend is slightly upward.

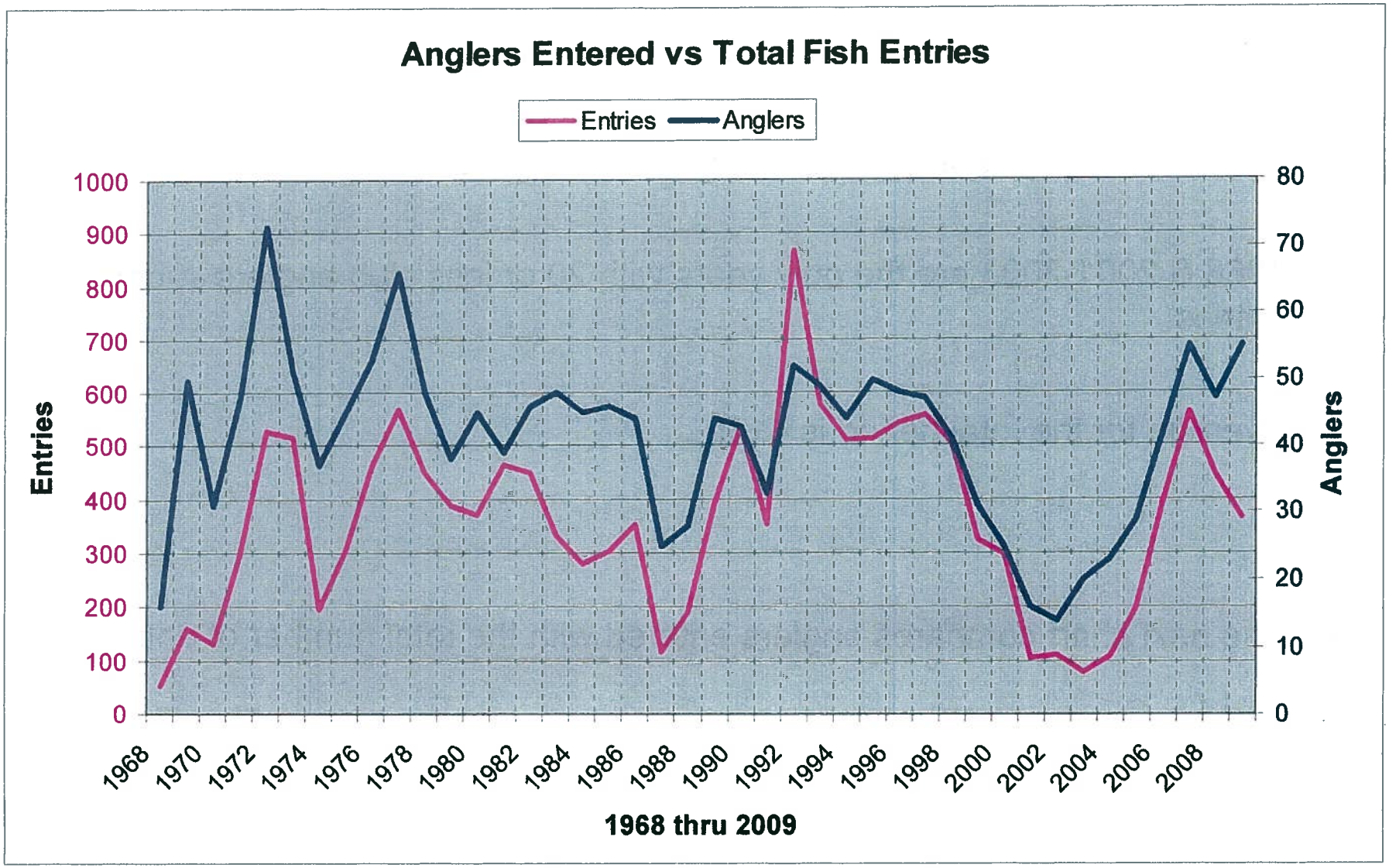
- Fish entries vary from minimum of 52 (1968) to a max of 867 (1992)
  - It reflects cycles in club membership and point fishing activity.
  - 1968 was club and system start-up.
  - 1992 appears to be an anomaly of very high activity.

- Average year is 363 separate fish entries.


Anglers Entered
Anglers
Linear (Anglers)
No. of Anglers
80
70
60
50
40
30
20
10
0
1968
1970
1972
1974
1976
1978
1980
1982
1984
1986
1988
1990
1992
1994
1996
1998
2000
2002
2004
2006
2008
1968 thru 2009

Anglers Data Analysis

- Linear trend across the 42 years is slightly downward.
- 1972 & 1977 are a bit anomalous with values of 73 & 76 respectively.
- 1968 & 2001-2003 are the only years with 20 or less club anglers submitting entries.
- Average for the total period is 41.2.
- The next chart compares anglers entered with the total number of entries …


Anglers Entered vs Total Fish Entries
Entries
Anglers
Entries
Anglers
1000
900
800
700
600
500
400
300
200
100
0
80
70
60
50
40
30
20
10
0
1968
1970
1972
1974
1976
1978
1980
1982
1984
1986
1988
1990
1992
1994
1996
1998
2000
2002
2004
2006
2008
1968 thru 2009

Anglers & Entries Comparative Data Analysis

- As might be expected, there are only a few exceptions in the correlation between the curves.

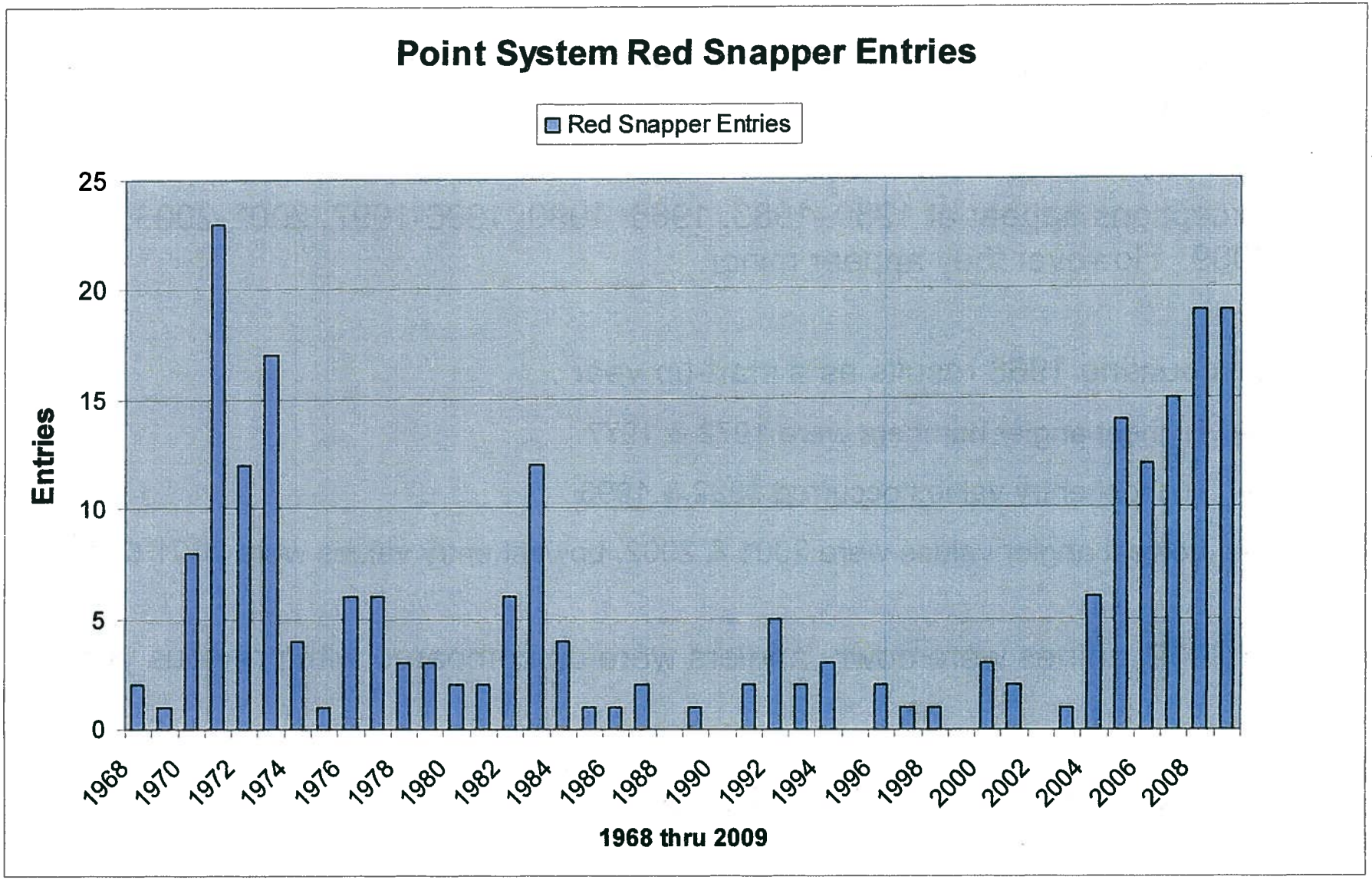
- Exceptions appear at 1980–1983, 1986, 1990, 1996-1997, 2002-2003, and 2009. However they appear minor.

- Discounting 1968 results as a start-up year …
  - Highest angler numbers were 1972 & 1977.
  - Highest entry values occurred 1992 & 1993.
  - Lowest angler values were 2001 & 2002. Lowest entry values were 2001 & 2003.

- In 2009, entries were down, anglers were up compared with previous year.

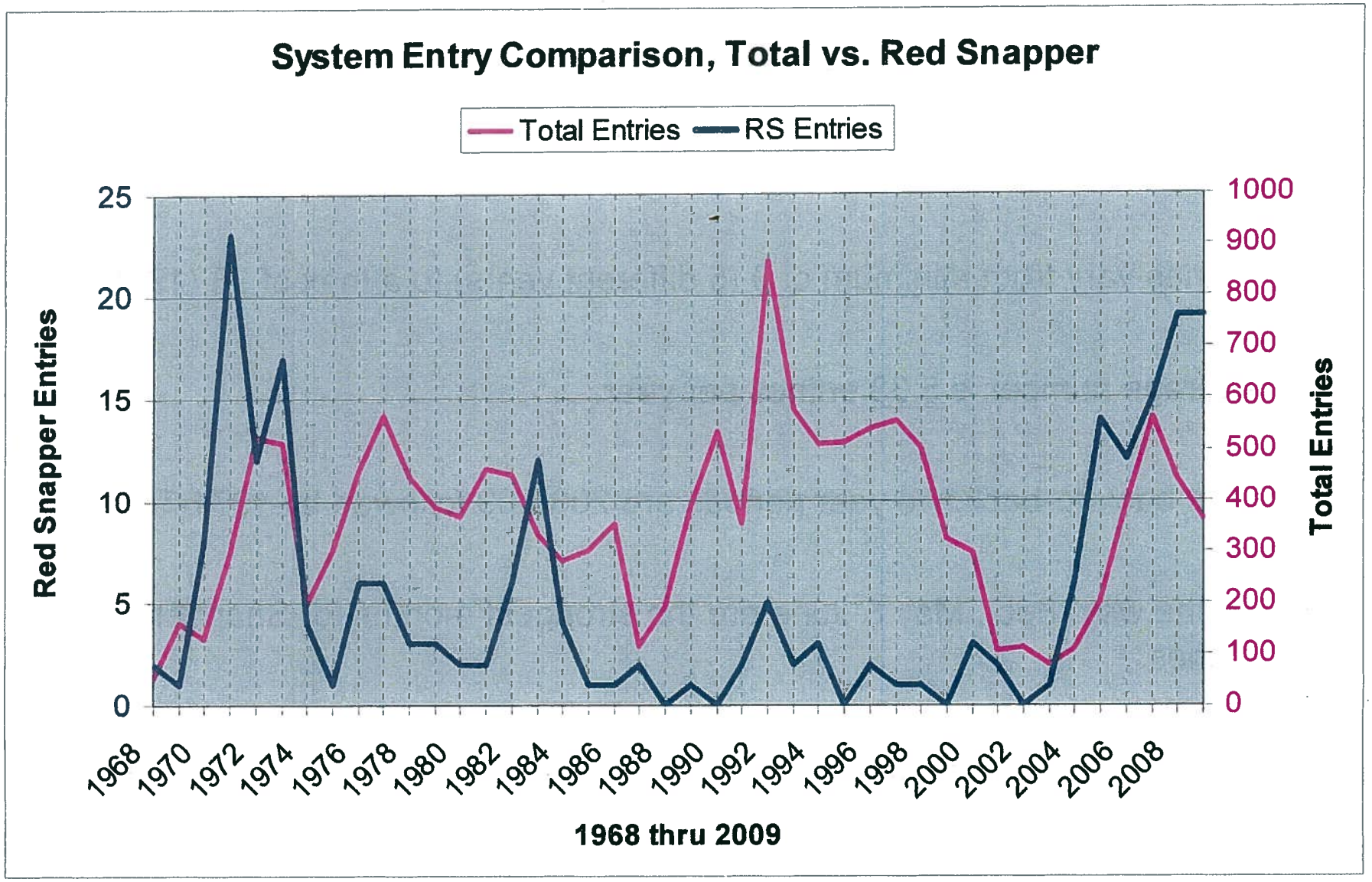
- The next chart graphs only the Red Snapper entries …

Red Snapper Entries/Year, 1968 thru 2008



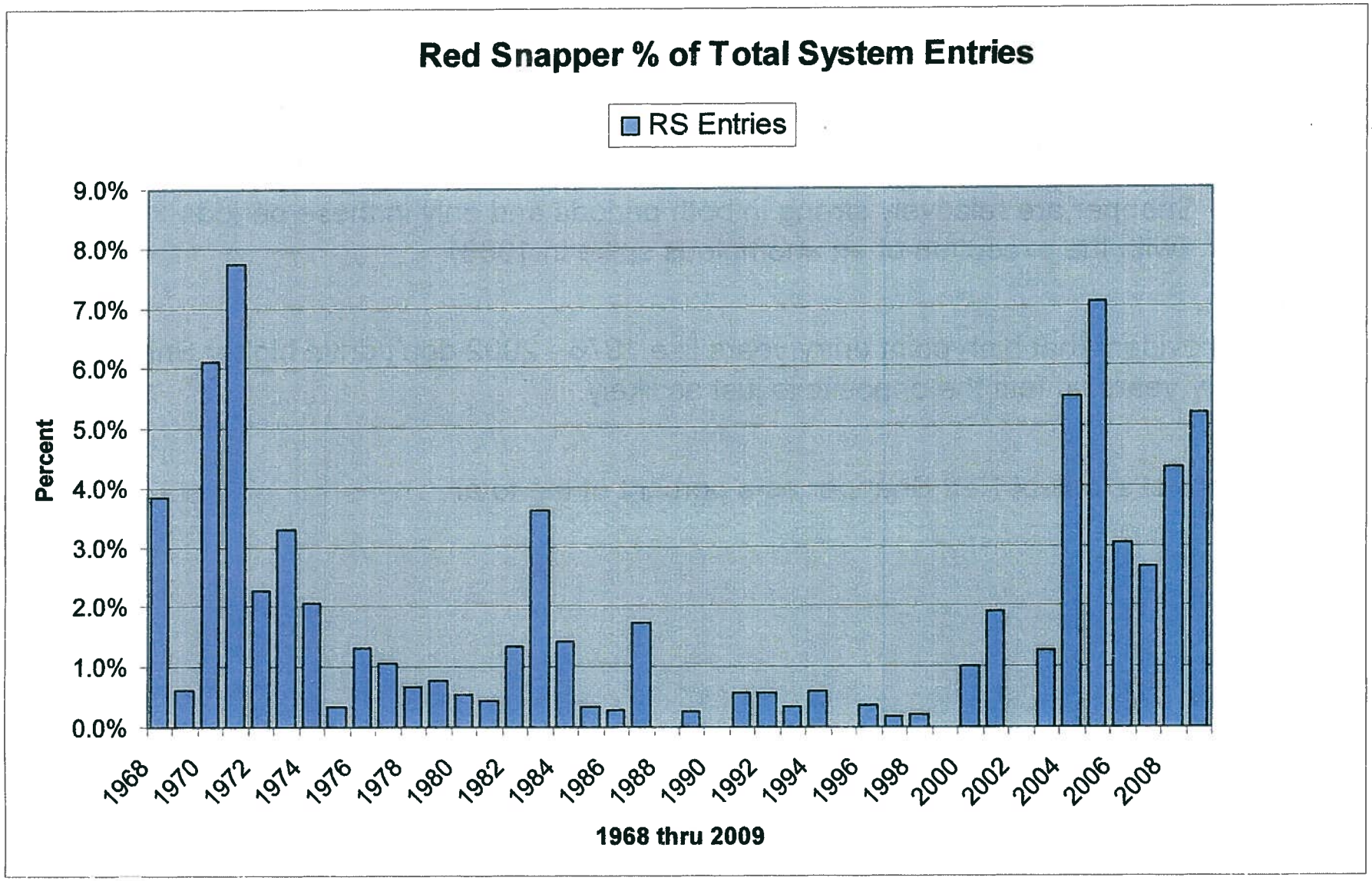
Red Snapper Data Analysis

- Again, entries vary considerably per year …
  - Reflects cycles in club membership, point fishing activity and species availability as discussed previously
- Entries vary from minimum of 0 (5 different years) to a max of 23 (1971).
- Average number is 5.33 entries per year.
- Best back-to-back two year periods are 2008-09 followed by 1971-72.
- By the way, Feb., May & June are the strongest months for Snapper entries.
- However, now we need to compare the Red Snapper data with the total entry data to see if one follows the other …


System Entry Comparison, Total vs. Red Snapper
Total Entries
RS Entries
Red Snapper Entries
Total Entries
25
20
15
10
5
0
1000
900
800
700
600
500
400
300
200
100
0
1968
1970
1972
1974
1976
1978
1980
1982
1984
1986
1988
1990
1992
1994
1996
1998
2000
2002
2004
2006
2008
1968 thru 2009

Red Snapper to Total Analysis

- Obviously, Red Snapper results <u>don't</u> follow total entries
  - Look especially at the first six (6) years and at the last six (6) years.
  - Snapper are relatively strong in both periods and only in these periods (with the exception of an anomalous spike in 1983).
- It is evident that high point entry years like 1976 - 2002 <u>don't</u> drive higher Snapper entry years, in fact the opposite is just as likely.
- Next, let's look at Red Snapper as a percent of the total …


Red Snapper % of Total System Entries
RS Entries
Percent
9.0%
8.0%
7.0%
6.0%
5.0%
4.0%
3.0%
2.0%
1.0%
0.0%
1968
1970
1972
1974
1976
1978
1980
1982
1984
1986
1988
1990
1992
1994
1996
1998
2000
2002
2004
2006
2008
1968 thru 2009

Red Snapper Percentage Analysis

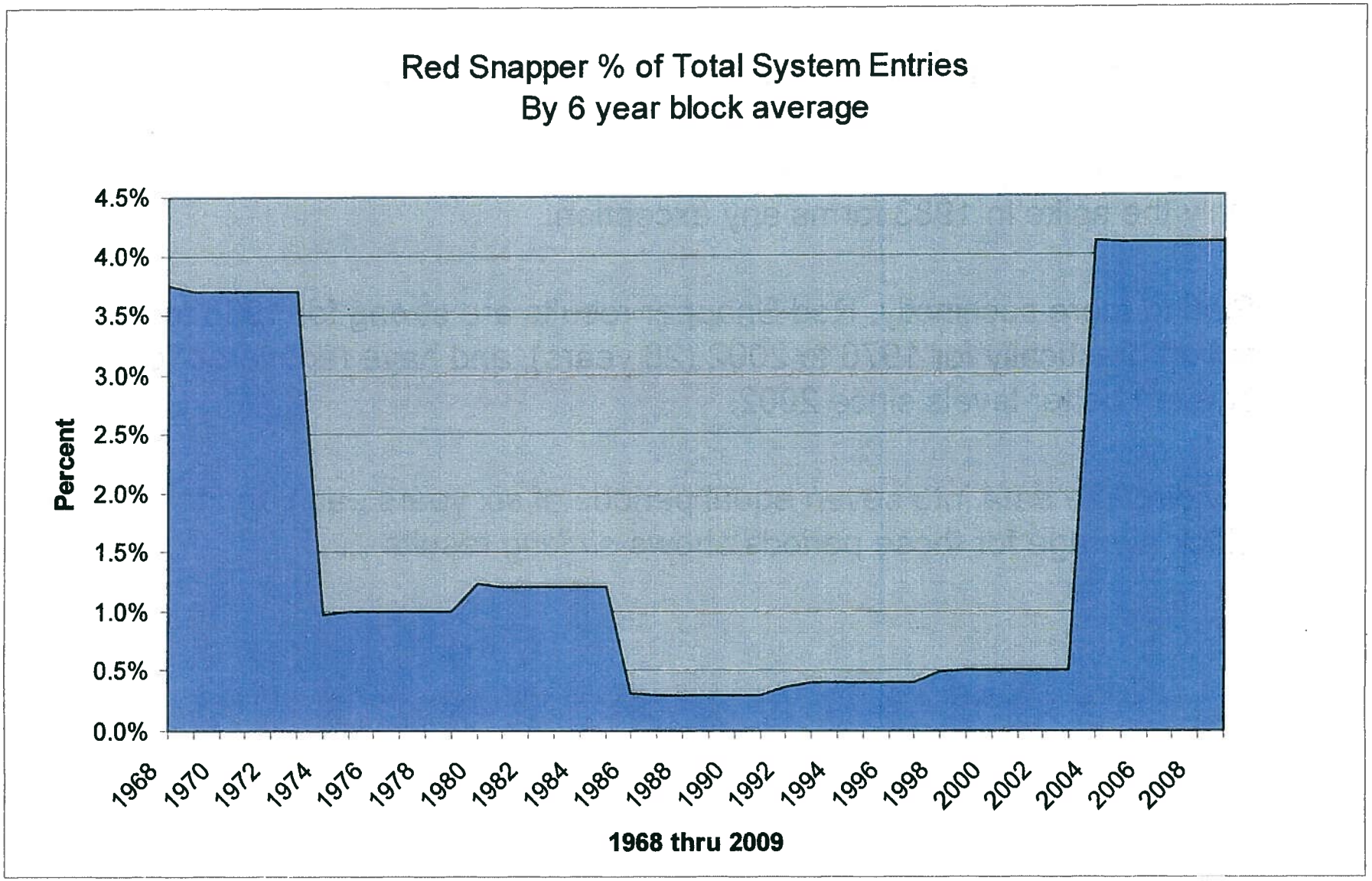
- Results are normalized for years of higher & lower entry activity.

- Results for early years and for recent years are markedly better. Only the spike in 1983 forms any exception.

- Stating more succinctly, Red Snapper results are strong for 1968 to 1975, fell off drastically for 1976 to 2002 (28 years), and have recovered to equal or even better levels since 2002.

- Dividing the data into seven equal periods of six years each and taking the block average for those periods shows *striking* results …

Each Six Years as Block Averages



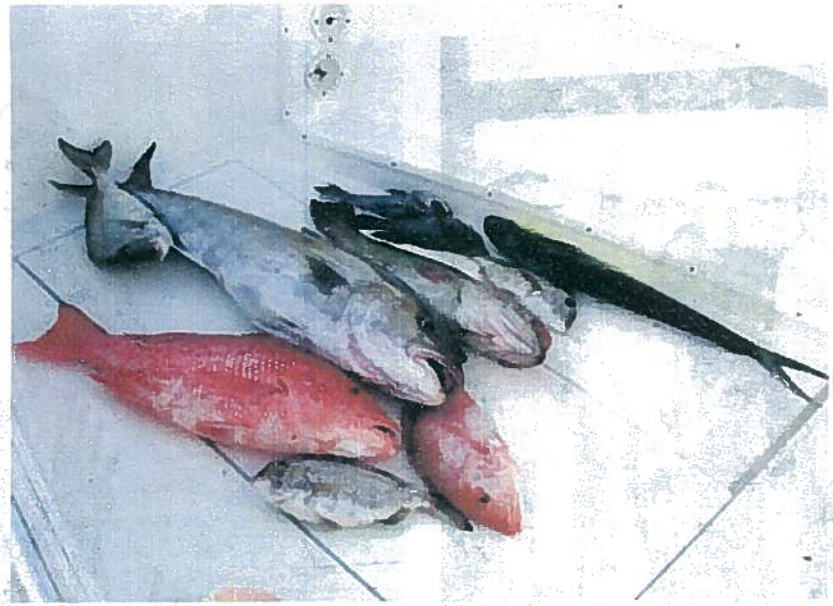
Six Year Block Average Analysis

- Normalizes year-to-year variance and demonstrates magnitude of sustained difference between periods of time.
- In the first & last 6 year periods, FSFA anglers experienced 4 to 7 times better results for Red Snapper than in the 30 years between; amazing!
  - Numerically, Red Snapper forms 1/65 or only 1.5% of the citation list species.
  - Each of the 5 middle periods were actually below that simple index.
  - However, the first & last periods registered at 2.5 to 3 times the index.
- Remember, entries are limited to quality sized fish and are spread between anglers, by entry rule, as previously established.
- The last six year period results reflect a strong, recovering fishery. Results are strikingly similar to the first six years (when the SAFMC and the SEDAR data states the fishery was several times better than today).
- The last two years together (08 & 09) are the best two back-to-back years in the 42 year history of the club!

Conclusions from Data

- Atlantic Red Snapper availability to Space Coast anglers (population) was comparatively strong in the period of 1968-1974.
- From 1975 through early 2000's, the population was dramatically less (by as much as 85%) except for a single anomaly in 1983.
- Availability (population) started rebounding in 2003 and has remained strong across the last six years, increasing steadily in the last three years.
- 2008 & 2009 tied for the second most Red Snapper entries in a single year, only exceeded by 1971. Best back-to-back years ever!
- Red Snapper doesn't look like a threatened species. Take a look at photos from 2009 of some club member catches …

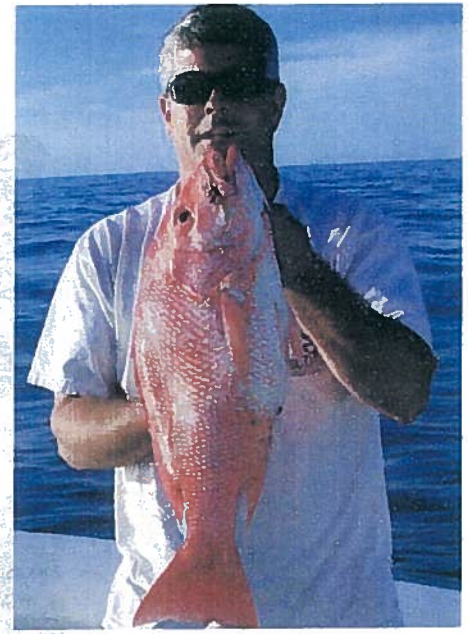
January 2009



FSFA's Lauren & Bill Parker, 01/03/09

FSFA's Chris Hudson 01/04/09

FSFA's Chris Hudson 01/04/09



FSFA's Scott Lehrmann, jig caught 01/04/09

Jan-Feb 2009

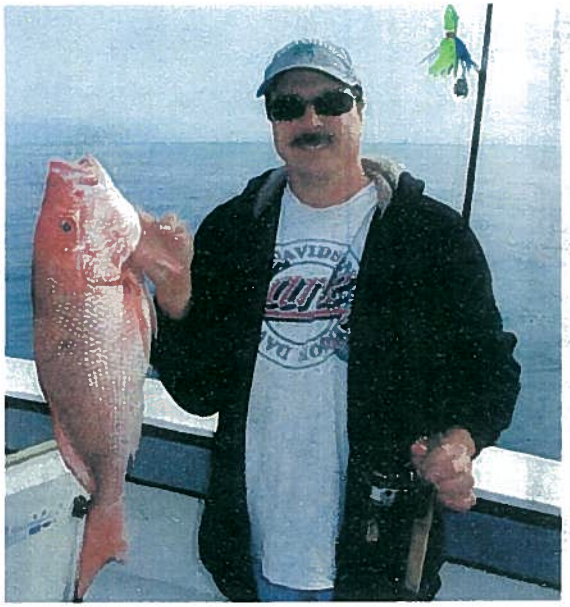
FSFA's Bill Parker, Rich Bostrom & friends, 01/18/09

FSFA's Mike Cochran w a jig caught ARS 02/14/09

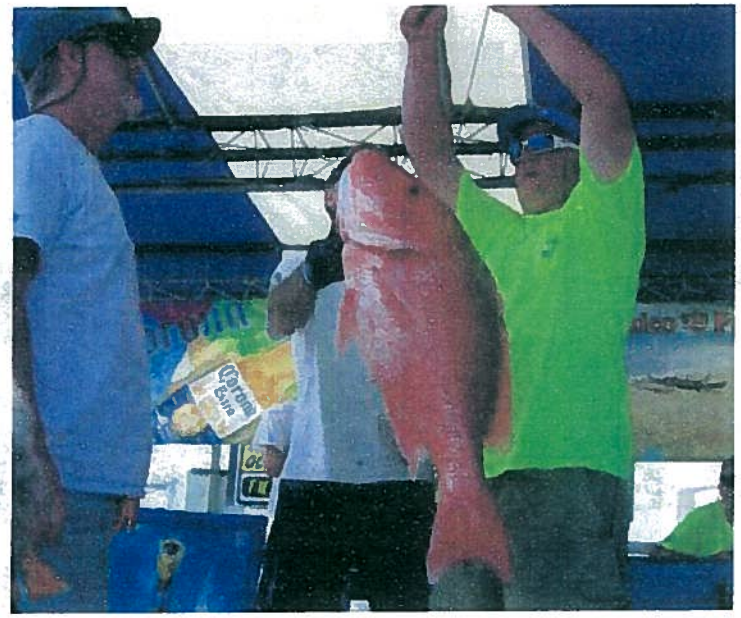
FSFA's Rich Bostrom & friend, 01/18/09

FSFA's Jim Russo with nice ARS 02/12/09

Feb-May 2009



FSFA's Dale Badgett w jig caught ARS 02/14/09



FSFA's Kyle Kosiba weighs-in good ARS 05/30/09

FSFA's Russ Derrick w personal best @ 27-6, 03/07/09

May-July 2009

FSFA's Steve Collins & Jack Mountford, all over 25# 05/30/09

FSFA guests, the Ferguson party, June 2009

FSFA's Steve Collins w 27-0 ARS 06/13/09

FSFA's Mike Cochran with summer ARS 07/11/09

July-Nov 2009

FSFA's Dale Badgett with summer ARS 07/11/09

FSFA's Lee Pollard with personal best 22-0, 10/04/09

FSFA's Bill Parker, Rich Bostrom & crew, 10/31/09

FSFA's Henry Hauch with ARS 11/01/09

Nov-Dec 2009

FSFA's Vickie Sallee, her very first ARS 11/27/09

FSFA's Rich Bostrom, Steve Goff & Bill Parker, 12/30/09

FSFA's Vickie Sallee, her first two ARS 11/27/09

Friends of FSFA's Ron Rincones w large ARS 12/31/09

Closing Statement

- Clearly, mid-Florida East Coast Red Snapper began a recovery in the early-mid 2000's and are as strong or stronger now as they were in early 1970's.

- The two fish limit and 20 inch minimum length rules in the Atlantic have clearly worked. This has been in place about eight years. The stocks are recovering in spades. Congratulations to the FWCC!

- Anecdotal input over and above the actual data describes 2009 as the "best Red Snapper year most Space Coast anglers have ever seen".

- To have this thriving fishery be shut down based on data where years of results were "extrapolated" in the SEDAR data is unfathomable.

- Local retired Captain and club member Ron Rincones, says it best. "We feel disenfranchised in the whole process. The angling communities speak almost in complete unity, yet action is taken directly opposite what we propose. What's with this? Does the council believe we are any less concerned with fish stocks and sustainability? We certainly are no less concerned, yet our voices are ignored!"

Well maybe our data will not be ignored!

Closing Statement (continued)

- What happened is a typical result of "unintended consequences" resulting from what was decently motivated legislation.
  - Magnuson-Stevens Act mandated actions + rush/flawed data = unwarranted actions
  - NOAA, NMFS & SAFMC took unwarranted action based on incomplete (SEDAR) data
  - They didn't listen to the regional inputs who knew. They just "went through the motions" with regional hearings, not wavering from what clearly was a predetermined path. Peer reviews of their data were basically dismissed and/or ignored. Another example of agency/ bureaucracy zealousness breaching reason and running a bit amok to meet a deadline.
  - This action resulting in the rights, economic stability and pursuit of happiness of southeastern U.S. citizens being unnecessarily infringed, both for anglers and associated businesses.
- These agencies collectively acted to unnecessarily impact the east coast community from NC to Florida in an extremely negative manner in terms of economics and fundamental rights of its sport fishing citizenry. The Red Snapper is the signature saltwater fish for this region. Closing this fishery is a very non-trivial step.
- HR 1584 & S.1255, both introduced, are steps toward flexibility, moderation and sanity in regard to implementing the Magnuson-Stevens mandates to protect fisheries. However, the subject needs legislative attention and follow-up.
- Our fervent hope is that our representatives will listen, investigate and do the right thing. And in the meantime, somebody needs to rein-in these agencies a bit!