

Public Reporting

The South Atlantic Fishery Management Council



Public Comment Form

Amendment

Snapper Grouper Amendment 49

Respond to the latest stock assessment of greater amberjack (SEDAR 59) through consideration of adjustments to Acceptable Biological Catch, catch levels, allocations, and other management measures for greater amberjack, as well as remove recreational annual catch targets (ACT) in the snapper grouper fishery.

Submit Date	Submitted By	Location	Affiliation	Comment																					
1/25/2023	First Name: Paul Last Name: Nelson Email: captpaul1966@aol.com	City: Port Orange State: Florida	Commercial, For-Hire	<p>My name is Paul Nelson, and my family has been fishing the South Atlantic since 1955. I represent my family who are in the amberjack fishery and other fellow amberjack fishermen from North Carolina to Key West. The reason for this letter it to address some concerns that many amberjack fishermen are currently facing. Our family has been in the amberjack fishery in the for hire and commercial sectors sin</p> <p>To manage a fishery properly there needs to be an understanding of the fishing process. Amberjack are caught using live bait in deep water between 150 and 500 feet of water. The live bait prevents most fish under 24" from being caught. The commercial size limit of 36" to the fork, causes many problems in this fishery now that the shark populations have rebounded. Larger amberjack fight on the hook longer and are eaten by sharks to the tune of 500 to 1000 pounds per trip (Up to \$2500 loss per trip). Smaller fish under 36", can be harvested quickly with fewer shark problems but are then released to be eaten by sharks.</p> <p>Even if you remove the negative factors in the fishery that have been created by these arbitrary size limits, they do not make scientific sense when you look at the entire biomass as a whole. According to SEDAR 59, in 2018, the stock lost 56% of age 1 fish to natural mortality and 44% of age 2 fish. These two age groups make up over 75% to 80% of the biomass, in a given year. In 2018 for example, Age 1 thru age 5 fish made up over 18 million pounds of amberjack up to 39 inches, total length. The commercial size limit is 36" to the fork. With natural mortality that is over 7,500,000 pounds of fish that could have been harvested, lost to natural mortality (M). The current size limits and quota on amberjack are illegal according to MSA regarding optimum yield. This stock is not being harvested at the optimum yield due to size limits that are not based in science. Broken down by age class from SEDAR 59, Table 6, page 41, of the assessment report it looks like this (rounded numbers):</p> <table border="1"> <tr> <td>AgeTotal Biomass Pounds</td> <td>Natural Mortality (M)</td> <td>Total Biomass Lost to M</td> </tr> <tr> <td>Age 1</td> <td>5,437,000 pounds</td> <td>.823,000,000 pounds</td> </tr> <tr> <td>Age 2</td> <td>3,527,000 pounds</td> <td>.571,500,000 pounds</td> </tr> <tr> <td>Age 3</td> <td>3,432,000 pounds</td> <td>.461,270,000 pounds</td> </tr> <tr> <td>Age 4</td> <td>3,143,000 pounds</td> <td>.391,037,000 pounds</td> </tr> <tr> <td>Age 5</td> <td>2,682,000 pounds</td> <td>.35800,000 pounds</td> </tr> <tr> <td>Total</td> <td>7,607,000 pounds</td> <td></td> </tr> </table> <p>On top of this they are now dealing with catch and gear loss worth thousands of dollars per trip. These size limits are also costing them precious time that they could be accessing other fisheries to make living instead feeding sharks all day. According to MSA; 98-623 (1) Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.</p> <p>There are clearly millions of pounds of pounds of amberjack that this stock could yield if the size limits were reduced or eliminated. With trip limits on this species, there is no need for any size limits, although selectivity due to fishing methods normally prevents the capture of any amberjack under 24". Therefore, a size limit is arbitrary and not necessary but could be 24" total length, that way the largest part of the biomass with the highest mortality could be part of the overall quota. This would make the stock healthier over time as more of the largest amberjack would survive and spawn.</p> <p>Thank you for your consideration in this matter.</p>	AgeTotal Biomass Pounds	Natural Mortality (M)	Total Biomass Lost to M	Age 1	5,437,000 pounds	.823,000,000 pounds	Age 2	3,527,000 pounds	.571,500,000 pounds	Age 3	3,432,000 pounds	.461,270,000 pounds	Age 4	3,143,000 pounds	.391,037,000 pounds	Age 5	2,682,000 pounds	.35800,000 pounds	Total	7,607,000 pounds	
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1/25/2023	First Name: Mike Last Name: Merrifield Email: mikem@wildoceanmarket.com	City: Titusville State: Florida	Commercial, Wholesaler/Dealer/Retail	<p>Regarding Action 1 – prefer Alternative 2. Regarding Action 2 - I prefer Alternative 1 - No Action. This fishery is already a 60% Rec / 40% Comm split. I don't think it is too much for the commercial and seafood consumer to maintain this current sector split. This is a valuable seafood consumer product that can typically be purchased by the consumer at an affordable price. Regarding Action 2 – If Alternative 1 is not selected, I prefer Alternative 3 – a 65% Rec / 35% Comm, a compromise of 1 and 2. I would like to see an action included in this amendment to address the minimum size limit. The minimum size limit should be eliminated or at a minimum should be 24". This will reduce shark predation, target the larger portion of the biomass and leave the larger fish in the ocean to spawn.</p>																					
1/25/2023	First Name: James Last Name: Hull Email: hullsseafood@aol.com	City: Ormond Beach State: Florida	Commercial, For-Hire, Wholesaler/Dealer/Retail	<p>Under action 1. I support Preferred alternative 2. abc = oy Under action 2. I support Alternative 3. 35 percent commercial and 65 percent recreational. This is the only fair and reliable way to allocate. using average landings from past 10 years. MRIP FES is unrealistic ,unreliable and should not be USED. I would also advise the council To eliminate the commercial size limit of 36 inches. It is killing animals needlessly to dead discards thru shark predation ,wasting and harming the resource. It was put in place 30 years ago ,Why? Amberjack is one of the few fisheries in the So Atlantic with large trip limits and volume production. It is not overfished and overfishing not occurring. We should be allowed to harvest our ACL efficiently with the least amount of environmental impacts as possible. This is where management makes a difference.</p>																					
1/25/2023	First Name: Paul Last Name: Nelson Email: captpaul1966@aol.com	City: Port Orange State: Florida	Commercial, For-Hire	<p>I support the 35percent commercial and 65 percent recreational. Under action 1 I support the preferred alt. 2. I also support the elimination of the size limits, due to the biomass consisting of 75 to 80 percent 1 to 2 year old fish. Thank you Paul Nelson</p>																					
1/25/2023	First Name: Tom Last Name: Hill Email: tom@keylargofisheries.com	City: Key Largo State: Florida	Wholesaler/Dealer/Retail	<p>I prefer Alternative 1 - No action. This fishery is already a 60% Rec / 40 % Commercial split. I don't think it is too much for the commercial and seafood consumer to maintain this current sector split. This is a valuable seafood consumer product that can typically be purchased by the consumer at an affordable price. What would increase the population of the amberjack for both Rec and commercial would be a reduction in sharks. The whole eco system has to be looked at not just one part.</p>																					

1/25/2023	First Name: Jack Last Name: Cox Email: dayboat1965@gmail.com	City: Morehead City State: North Carolina	Commercial	These are my comments for AM 49 Greater Amberjack. I have been commercial fishing for Greater Amberjacks since 1985 from Cape Hatteras to Morehead City NC. My comments are from my experience in my region and may not reflect on what my colleagues are experiencing in their regions. I will disagree with the SSC's ABC Recommendations for Sedar 59. I have noted a fairly dramatic decline in the number of Greater Amberjacks and the decrease in size of them. I have spent most of my time harvesting Greater AJ's in depths of less than 120 feet. During the 1990s I saw large schools of big Greater Amberjacks just about everywhere I was fishing. Today its much different. Back then I was one of the few day boats to target Greater Amberjack. Now the Snapper Grouper fishery is very dependent on this animal due to overharvest of Gags, Red Grouper, Scamps, Snowys and other SG Species. There is a strong demand for this fish especially now that the Gulf has overfish their AJ's. I hope that we can preserve this fishery so we dont fall short on expectations like we have done with so many others. But I'm doubtful after reviewing the preferred alternatives for this fishery. My proposal would be to allocate 50% to the commercial fishery and 50% to the recreation fishery. Until the permit process and accountability for the recreation sector improves its just not fair and equitable to hold the commercial fishery to a higher set of standards. Under Action 3 the recreational size limit should be at least 34 inches to help improve biomass. Most of these smaller fish are taken in less than 120 feet of water and are strong enough to survive if taken on circle hooks. I have noted amberjacks floating off when taken on straight hooks due to being gut hooked. I would add an alternative for Action 4. Add alternative 5 for a 34 inch size limit on the commercial sector. As a SG AP member there was lots of concern from other AP members on this stock to performing to what the SSC's recommendations are from Sedar 59. It only makes sense that a fish that gets to grow a little bigger will increase the overall health of the stock. Many of the Greater Amberjacks that I have caught in the last five years have been 32 to 36 inches. I would be very pleased to keep 34 inch amberjacks! Action 5 Trip Limits- The council has spent plenty of time on this and I would keep it Status Quo. 1200 lbs for the first half of the season and 1000 lbs for the second half. There is plenty of documentation from past council meetings to explain more if someone needs a review. Action 6- April Spawning- Spawning should be close for the recreation sector just as it is for commercial. Spawning is what keeps us all in business. My hope is we preserve this fishery and don't have to take hard hits like we are doing with many of our other species as it is very important to both commercial and recreational fisher people. There is and will be an increased demand for Greater Amberjack and I would tread lightly on this Amendment. Thank you.
1/25/2023	First Name: Kelly Last Name: Reeder Email: 123kel@gmail.com	City: Port Salerno State: Florida	Commercial	I support the April spawning closure for all sectors. I strongly support a minimum size change for the commercial section to 32 inches to reduced discards, reduce damaged gear from larger fish, reduced risk of shark depredation and greater commercial desirability for smaller fish. If there is strong scientific reasoning to have the size at 34 instead of 32 then the recreational size should also be changed to match the commercial size.
1/25/2023	First Name: Lonnie Last Name: Reeder Email: wildtailsseafood@gmail.com	City: Stuart State: Florida	Commercial	I support the April spawning closure for all sectors. I strongly support a minimum size change for the commercial section to 32 inches to reduced discards, reduce damaged gear from larger fish, reduced risk of shark depredation and greater commercial desirability for smaller fish. If there is strong scientific reasoning to have the size at 34 instead of 32 then the recreational size should also be changed to match the commercial size.