

Snapper Grouper Amendment 47 (For-Hire Permit Modifications) Scoping Comments Summary

Below is a summary of comments that were submitted online and comments received during the three scoping webinars held on August 6th, 9th, and 14th. Comments provided during the webinars (n=7) are included in this attachment as well as the webinar attendees. Online comments (n=143) are available to view in full at: <https://safmc.wufoo.com/reports/s-atlantic-forhire-permit-modifications-report/>.

Respondent Characteristics:

State	Number of Respondents	Affiliation	Number of Respondents^{1,2}
NC	18	Private Recreational	112
SC	35	Commercial	27
GA	15	For-Hire	41
FL	75	Wholesale/Dealer/Retail	16
Other	5	Non-Gov't Organization	5
		Other	11

¹Some respondents chose more than one affiliation.

²Includes online respondents only.

Most commenters chose to focus on the permit moratorium being considered in Amendment 47. There were relatively few comments on topics other than the moratorium. The majority of commenters did not support moving forward with limited entry or a moratorium on snapper grouper for-hire permits. Of the comments that could be readily categorized, there were 137 in opposition to limiting the number of for-hire permits and 7 in favor of doing so. A summarized version of the comments is below.

Comments in opposition to a moratorium or limiting entry:

- General opposition to limiting or reducing the number of for-hire permits.
- Limiting for-hire permits should be a state issue, not a federal issue.
- Charter boat numbers should be growing and some areas need more charter boats. Coastal populations will be increasing, creating a higher demand for charter/headboat trips.
- Many anglers depend on for-hire vessels to reach federal waters. Limiting the number of permits will limit fishing opportunities.
- Restricting or reducing the number of for-hire vessels will drive up costs for customers and restrict choices of when and where one can go fishing. It may also drive anglers towards for-hire operators fishing illegally without a permit or without proper certifications.
- By limiting the number of permits, you will be limiting government revenues derived from sales tax and other ancillary services and taxes.
- A moratorium seems like a step towards catch shares.
- There is concern over creating a market for the for-hire permits and potential costs of the permits. Limiting the number of permits would set up a situation where only wealthy individuals would be able to afford a permit and those in the fishing business would be forced out.

- Limiting entry will be harmful to people that want to become charter captains. Restricting entry into the fishery makes winners out of current permit holders at the expense of those trying to come into the field.
- The reasoning for a moratorium is lacking, as the number of permits were stable prior to the Council's consideration of a moratorium. There is no compelling scientific, enforcement, or biological justification for limiting or reducing the number of charter or headboats in the snapper grouper fishery.
- The stated goals of the amendment can be addressed through less restrictive options than limited entry. Standard harvest controls of seasons, creel limits, and size limits are more appropriate than seemingly arbitrary limitations on the size of the for-hire sector.
- The Council should explore other ways to manage the fishery rather than restricting the number of for-hire permits and should address overall allocation and the ACL.
- Present requirements to operate within the for-hire sector are already achieving professionalism for the for-hire fleet.
- The industry, due to economics and fisheries regulations will self-regulate in size. Protectionism doesn't work and the market should decide which charters are viable and which are not.
- Limiting or decreasing the number of for-hire permits will make the charter business less competitive.
- Unpermitted vessels taking charter trips is a law enforcement matter that will not be stopped by limited entry.
- Support for strengthening enforcement measures and fines to deter repeat offenders.
- Several species are not in a situation where decreased fishing pressure is necessary.
- A moratorium will lead to divisiveness in the recreational sector.
- Limited entry is not going well in the Gulf of Mexico and is not wanted in the South Atlantic.
- Over the time period that the Council has been considering limiting the number of for-hire permits, there have been numerous comments in opposition to doing so.

Comments in favor of a moratorium or limiting entry:

- This amendment is needed to get a handle on the number of vessels fishing for snapper grouper in the EEZ.
- The for-hire permit will not be a law enforcement priority until it is limited entry.
- The for-hire fleet has the capacity to exceed the red snapper ACL, which is a biological justification for limiting entry.
- Overcrowding seems to be more of an issue in South Florida where the shelf edge is closer to shore. Could limit entry in targeted areas rather than the whole region.
- The Florida Keys are overrun with charter boats. Limiting entry will help address vessels fishing illegally.
- Localized depletion of species and the over capitalization of localized fleets are incredible.
- The explosion of charter boats in the Jupiter/Palm Beach, FL area, of both permitted and vessels that are fishing illegally is causing conflict between the recreational fishermen and the charter fishermen, because you are just running out of room.
- The charter boat business is oversaturated and there is no threat to an angler not being able to go fishing with a for-hire captain on any given day.

- For-hire vessels should be treated as commercial fishing vessels and their numbers should be limited.
- These days, anyone can be a guide, which impacts those that depend on it for a living.
- A moratorium is necessary for the for-hire permit holders as they will be required to report landings at the same level as the commercial sector. In the event of for-hire ACL allocations, it is necessary to make an accurate record of for-hire effort from an earlier date.
- The Council is putting a reporting system in and wants people to report, but there is no reason for them to have a permit or keep a permit.
- Over the time period that the Council has been considering limiting the number of for-hire permits, there have been numerous comments in favor of doing so.

Comments regarding multiple permit types, a permits pool, transferability and exceptions to eligibility:

- Consider allowing the entrance of those who have not had a permit to fish for snapper grouper in the EEZ in the past and create a two-tiered permit system that allows permits issued to those that have had the permit historically to obtain a transferable permit. Those that did not have the permit historically should not be shut out of the fishery, but their permit should not be transferable.
- Non-transferable permits could be retired to a permits pool that allows new entrants if they do not report or are inactive for three years.
- A green horn permit should be considered and there should be a process to let people into the fishery. For-hire permit holders can sponsor greenhorn permit applicants and they can go through the MREP program.
- Commercial fishermen should be allowed to trade in their commercial snapper grouper permit for a for-hire permit.
- Do not support limiting entry, but if the number of permits are limited then permits should be non-transferable.

Comments regarding the permit provision specifying a harvest closure of snapper grouper species in state waters when closed in federal waters, issuing a permit to an individual rather than a vessel, applying a tracking number to permits, and other provisions:

- A permit should be issued to a vessel. If it is not, this could discourage the ability to get scientific data and rental vessels could be used in for-hire operations.
- Do not change the state waters closure provision. Removing the provision will hinder law enforcement, as people can easily state that a species was caught in state waters when it was actually from the EEZ.
- The Council should remove the prohibition on retention of snapper grouper species in state waters onboard federally permitted for-hire vessels when the species are closed to harvest in federal waters as this is an equity issue.
- Non-transferable permits assigned to individuals would be more easily tracked and could deter repeat offenders.
- Numbering and tracking existing permits would prohibit renewal or acquiring a new permit if there are violations.
- Requiring an apprenticeship or specified landings prior to being granted a for-hire permit could address professionalizing the fleet.

**AMENDMENT 47 PUBLIC HEARING
WEBINAR**

August 6, 2018

MR. LAKS: Ira Laks, state of Florida. I think this is desperately needed to get a handle on the amount of vessels that are fishing in the EEZ for Snapper Grouper. I've modified my position on this and I'm willing to allow those entrance that have not been legal for all these years in the fishery. There should be a two-tier permit system for those people have followed the rules and had their permit and followed the negative regulations that these permits have. They should be able to get a transferable permit. That way if somebody gets sick or hurt or needs to sell their permit and get out they can and somebody who has the means can use good old capitalism to buy their way into a business. I'm also open to the fact that there are people out there that don't have their permits and shutting them out is really not what I'm looking to do at this point. Those people should be allowed to have a permit that is none transferable where they are able to fish. These permits and the enforcement of this issue will not be handled until these permits are limited entry. I have dealt with law enforcement several times over this and it will not be a priority until it is limited entry. To some of the other things, as far as green horns, absolutely. There should be a process to let other people in. First of all, you can have the nontransferable permits, you can have people who do not report, or show that they are inactive for three years, well then, they lose their permit and you have those going to a pool of new entrance. You can also have, like we said a green horn permit where people can sponsor people, they can go through the MREP program, and be allowed into the fishery. One of the things you had brought up earlier was about commercial fishermen getting a permit to compete, to retire into the For-Hire business, I completely agree with you. They should be allowed to and any time they want to trade their Commercial Snapper Grouper permit for a For-Hire permit, they can call me. I'll be more than glad to do a swap. Permits should be issued to a vessel. How could you check the capacity of a fleet if you don't know what vessels are being used? I mean, it's you know, it's not even, make any sense at all. If I can go down and rent a boat at the boat rental dock and take a charter out on it, well then, you're going to have no scientific data. You had brought up about allowing to catch federally closed species in state waters. Hey, you know, that hurts me a lot, but I still don't think it should be allowed. There is not offshore, there is no enforcement unless it can be dockside enforcement. So the council would look awful silly if they spent all this time and energy to have special management zones, enclosed zones for Warsaw Grouper and Speckled Hind Grouper and if me as a federally managed charter, can catch them in state waters or slip over the line and just race back in after I catch a Warsaw Grouper and not be able to be checked at the dock, what a waste of time all of that was. The over, the localized depletion of species and the over capitalization of localized fleets are incredible. The explosion of charter boats in my area, of both permitted and vessels that are fishing illegally is causing conflict between the recreational fishermen and the charter fishermen, because there's, you're just running out of room. Trying to think of what else I had to say. But, I think you all know my feelings on this. It's vital for this to be enforced. You will not have enforcement of your reporting system. One thing to consider is were all worried about the amount of permits that are going up. What's going to happen when you really get this reporting system going and your permits start going down? Because people are going to be like "Well I don't want a permit, I don't want to report." And your scheduled fine for being caught off shore for not having a permit is \$500, and I don't know

what the mathematical equation for being caught off shore from a law enforcement officer fishing off shore without a permit, the chance of getting caught is miniscule and it's a \$500 fine, and if you ask most Charter guys if you would pay \$500 not to have to report, I think they would. And if I could get a permit every time you pull me over and I get one and you said I got to get one, and I get one the next day, you know. You're putting this reporting system in, and you want people to report, but there is no reason for them to have a permit or keep a permit. And I think that's all I have left in my brain.

MR. SWATZEL: Thank you John, Tom Swatzel, Executive Director of The Council for Sustainable Fishing. We're headquartered here in Murrells Inlet, South Carolina. Thank you for allowing us an opportunity to present comments on Amendment 47. We had submitted comments in writing, and I'll let our president Wayne Mershon get into the details on why we oppose For-Hire Limited Entry, but I just wanted to make a couple of comments in addition. One is that, clearly there is no scientific or biological justification for limiting or reducing the number of Charter or Head boats in the Snapper Grouper fishery. The other issue is that you know, the Council keeps saying that they want to hear from us on this particular amendment and fishery stakeholders have been talking about For-Hire Limited Entry for about two years now that the Council has been pursuing it, and time and time again, Council has heard from Fishery Stakeholders, hundreds of them, and those hundreds have said that they do not want it. This really raises the question of Fishery Stakeholder fate in the Council process. On one hand the council says they want to hear from them, on the other hand, are they willing to listen. But, I suspect by the time this scoping period is over with and the Council has this meeting in September, it'll probably be another couple hundred Fishery Stakeholders who have weighed in on Amendment 47 and limited entry and basically overwhelmingly oppose it. So, I think it's important for the Council to listen and act accordingly on this, again there is no scientific or biological justification for For-Hire Limited Entry. Having said that, there is the component of 47 that should be dealt with. And it is that the Council should remove the prohibition of retention of Snapper Grouper species in State Waters on board federally permitted For-Hire vessels when the species are closed to harvest in Federal Waters. I think there is certainly an equity issue there that's mentioned in the Amendment document. So, we would ask that Council deal with that issue but vote down continued pursuit of For-Hire Limited Entry. Listen to the hundreds of stakeholders that have gone on the record over these last two years saying that they don't want this and again there is no biological or scientific justification for this at all. I certainly appreciate your time.

MR. BOWEN: Hey thanks John, thanks for taking my comment. First and foremost, I ditto exactly everything that Ira Laks stated in his comment. He is absolutely 100% correct and I absolutely agree with him. To Tom's point, I just asked the question about if every permitted vessel caught a Red Snapper would the ACL be exceeded, and Council Staff has confirmed that as being yes. So, it is defiantly a biological standpoint, it's just one aspect of it, but yes, it is proven it is defiantly a biological question. To his second point, about the hundreds of commenters in favor, you know I haven't read all the comments online but I've been at every council meeting for the last two years since this came up, and I don't know the exact numbers right off hand, but we have had, yes there have been comments opposing this, and Tom seems like he knows the numbers, I don't, but there have been many, many people that are wanting this. So, they way that come across in his comment seemed like there was nobody wanting it, that

nobody is wanting it, which is, just not an accurate statement, there have been many comments in favor for it. Thank you.

MR. GORHAM: Bill Gorham, from North Carolina. I'm not a charter captain, or a permit holder obviously, I was asked by some of the North Carolina that are to come and give a public comment on their behalf. And just to summarize it real quick, the documents that they had looked at, they are not in support of a Limited Entry. They would rather the Council and the science address the overall allocation and the ACL and go from there. That is all.

**AMENDMENT 47 PUBLIC HEARING
WEBINAR**

August 9, 2018

MR. LAKS: Ira Laks, Florida. I just want to a comment to what Jim was saying about a permit being like a Captain's license. That wouldn't really pertain because right now I can't leave my federal permit at home, I'm still bound by the rules because that permit is issued to me, issued to my vessel. My Captain's license is issued to me and if I leave it home, well it's a problem. You know, but if I leave my federal permit at home, I'm still bound by those rules, so I still would have the limitations of not catching fish in State waters or not having, not being able to sell fish from State waters, or criticize when I'm commercial fishing regardless if I had it on board or not. Where if you made it like a Captain's license, I couldn't just leave it at home where I can't do that now because the permit is issued to my vessel. And that's it, thanks.

**AMENDMENT 47 PUBLIC HEARING
WEBINAR**

August 14, 2018

MR. MERSHON: Wayne Mershon, Council for Sustainable fishing, I'm at South Carolina and I'll start my comment here. When questioned last Monday on Amendment 47 webinar The South Atlantic Fishery Management Council scientist, John Hadley, had to admit that what we been saying all along was true. The South Atlantic Fishery Management Council has no scientific findings or biological or social science to support limiting or reducing the number of Charter or Head boats. I can go into stating exactly what was said, but I believe that everyone heard it. And so, my question is, if there's no scientific findings or biological or social science to support limiting or reducing the number of Charter and Head boats, then what's the purpose of a For-Hire limited entry? It's about picking economical winners and losers. Limited entry is an anti-competitive measure that will create a stock market or For-Hire permits and is the first step in creating a For-Hire catch share program that will destroy jobs and hurting fishing communities. Just look at what's happening with the For-Hire limited entry program in the Gulf of Mexico. I've heard numerous sides to this story. Some say it's about all the under radar, under the radar charter boats with no permit that are booking and running charters off the websites that this Amendment needs to be passed for. Statements like that are, and should be, directed to law enforcement to stop this illegal activity. Passing or not passing this Amendment will not stop these activities without law enforcement being involved. These visioning projects that has been

publicized is stakeholder driven are not helping the Council image. When so many are against something, but the Amendment keeps alive because of a few. I ask the Council to please listen to the stakeholders and their own scientist and lay this Amendment to rest and use the time for more important management of our fishery. Thank you very much, I'm Wayne Mershon.

MR. BOWEN: Thanks John. My comment is, and it's really probably just a question, first of all, Zack Bowen and I represent not only Georgia but South Carolina, North Carolina, and east coast of Florida, and anybody that's a For-Hire owner/operator or just an operator for that matter, but. So there seems to be a bit of confusion because I asked on the first webinar, if every permit holder carried a person fishing during the six days of our mini season for Red Snapper would the ACL be exceeded and the answer from Council Staff was yes it would be exceeded. So, to say there's not a biological rational for having a limited entry program seems a bit jaded to me. I just, there is definitely a biological issue, there's more issues that, it would benefit but it would definitely benefit the fisher just from the Red Snapper stand point. So, the Council admitted, or answered the question, Council Staff admitted, or answered the question to me on the first webinar. You did say, Council Staff did say that the ACL would be exceeded if they carried one person fishing and they each caught their snapper. Correct? Thank you.

SG AMEND 47 SCOPING 8/6/18

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SG AMEND 47 SCOPING WEBINAR 9 AUG 18

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**Coastal Conservation Association
Comments to the South Atlantic Fishery Management Council
On Amendment 47 to the Snapper-Grouper Fishery Management Plan
For-Hire Permit Moratorium**

Thank you for the opportunity to comment on Amendment 47 to the Snapper-Grouper Fishery Management Plan, the For-Hire Permit Moratorium. Coastal Conservation Association is the largest marine resource conservation group of its kind in the country, with more than 125,000 members united in our efforts to ensure the health and proper conservation of our marine resources and anglers' access to them.

Some of the stated reasons for implementing the proposed permit moratorium are to:

1. Reduce competition
2. Professionalize the For-Hire Sector
3. Enhance enforcement of marine resource regulations
4. Improve compliance with reporting requirements

While it could be argued that limited entry may achieve all these objectives, we believe these objectives can be met without limited entry. Thus, CCA is opposed to a permit moratorium and possible future such effort controls in the For-Hire Sector of the South Atlantic Snapper-Grouper Fishery (hereafter referred to as For-Hire Sector).

We do not believe there is a sufficiently compelling biological or enforcement reason to take such action. Demographic trends indicate that people will continue to relocate to America's coastlines for a variety of reasons, including lifestyle, climate and recreational opportunities. A not insignificant portion of the people moving to the Southeast can be expected to take advantage of the region's renowned marine resources and engage in recreational fishing. For the non-boat owning public, the for-hire industry is the primary means of accessing marine fisheries.

With this in mind, we believe the Council should in general *promote and increase* access to the region's fisheries when possible, not arbitrarily restrict it to solve management challenges. We understand that the region's fishery resources are finite and cannot sustain ever-increasing harvest pressure. However, we believe the standard harvest controls of seasons, creel limits and size limits are more appropriate than arbitrary limitations on the size of the For-Hire Sector. If the size of the For-Hire Sector is fixed and not allowed to expand based on future demand, we believe there will be negative impacts on the recreational anglers who are the customers on those vessels. These will include higher trip prices, reduced choices of when and where one can fish and an overall deterioration of customer service.

As for desires to "professionalize the for-hire fleet," we would argue that present requirements to operate within the For-Hire Sector are already achieving this objective and, in addition, this

implies the current For-Hire Sector members are somehow not professional. We are unaware of any systemic indications that the For-Hire Sector is in need of further training, but if this need exists then surely the place to address it is in the existing U.S. Coast Guard licensing and training requirements rather than a limited entry program. Furthermore, it would seem that a desire to reduce competition is in direct contradiction to a desire to professionalize the fleet as competition often brings out the best in a business.

Of the stated reasons for implementing a moratorium on permits in the For-Hire Sector, only the last two come close to rising to the level of sufficiently compelling reasons. One of the problems often brought up is the inability of a federally-licensed for-hire sector operator to fish in state waters when the federal season for a given species is closed. Somehow a permit moratorium or other effort control will alleviate this problem? If this is indeed a real problem, cannot this conflict be eliminated in another manner?

It is alleged that NOAA Fisheries Law Enforcement cannot enforce a permit suspension or revocation due to the current open-access system within the For-Hire Sector. It is difficult to believe that all an offender who has had his or her federal permit revoked has to do to continue fishing is simply go buy another federal permit. Automobile drivers who have had a driver's license revoked cannot simply go to the DMV and get another one. We support significantly strengthening enforcement measures and fines to deter repeat offenders in the For-Hire Sector. Additionally, we believe that non-transferable permits assigned to individuals rather than vessels or corporations would be more easily tracked in databases to prevent serial abusers from acquiring new permits. If it is indeed necessary to limit the number of permits in the For-Hire Sector to improve enforcement, then the only way we could support such a measure is for such permits to be non-transferable.

Improving compliance with catch/effort reporting requirements is indeed a worthy goal but it is not clear why a permit moratorium and limiting the size of the For-Hire Sector is necessary to do so. All measures that could be enacted to require reporting in a limited entry scenario can be enacted in an open-access scenario. Again, zealous and effective enforcement of reporting requirements is the key to achieving this objective not limiting effort.

Establishing a permit moratorium and limiting the size of the For-Hire Sector appears to be a solution in search of a problem. We strongly encourage the Council to fully explore other options to address the issues of concern. Recreational anglers very much appreciate the services of the For-Hire Sector. It is an important component of the marine recreational fishery as it not only provides an essential access point to the region's offshore fisheries, but also provides the local knowledge and expertise needed for anglers to have a satisfying experience while fishing.

We want to see a vibrant, dynamic for-hire sector in our marine recreational fisheries that has growth capacity to meet increasing demand while providing the highest quality of service to its customers. We look forward to working with the Council and the for-hire sector in federally-managed fisheries industry to identify and eliminate barriers to a secure and prosperous future.

In closing, CCA does not believe that a moratorium on the issuance of permits is in the best interest of the For-Hire Sector of the South Atlantic Snapper-Grouper Fishery or overall for-hire sector. We also do not believe that such a moratorium and possible future effort controls are in the best interest of the recreational anglers who rely on the for-hire sector to access healthy marine resources.

National Party Boat Owners Alliance, Inc

“The original and still active “watchdog” organization for the small passenger vessel industry”
(Quote from USCG Distinguished Public Service Award to Capt. George Glas)

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July 25, 2018

To:SAFMC

Subject: Comments on Snapper-Grouper Amendment 47

NPBOA has been representing small passenger vessel owners and operators since 1952. Our primary goal is working with our regulators to ensure regulations are fair, have a positive effect on safety and be reasonable enough to do no harm to the industry. While there are tour boats and ferry operations who are members of this organization, most of our members are for hire fishermen, both inspected boats and uninspected boats. The commonality between the inspected and uninspected sectors are Licensed Captains, mandatory drug testing, and lifesaving equipment. Licensed individuals are held accountable by USCG for all of their actions. The Safety record of this fleet is the envy of the rest of the maritime world.

Sometimes, proposals such as Amendment 47 are generated by individuals suffering from tunnel vision. There are many reasons why this is a bad idea, and I am sure you will get plenty of comments to those from others. NPBOA however wishes to point out the pitfalls implementation of this amendment would generate.

1. It would reduce the available boat bottom (carrying capacity) of the for hire fleet.
2. A reduced for hire fleet would drive anglers with no boat of their own to climb aboard recreational boats acting as “Gypsy Charter Boats”. These are operated without even the minimum standards applied to the uninspected passenger vessels. It is a problem throughout the maritime community. Coast Guard is working hard with legitimate operators to identify and then confront these operations in an effort to shut them off. This is a safety issue as well as a legal one. If one reads the marine accident and fatality reports put out by Coast Guard it becomes overwhelming clear that there is a very large safety issue among the untrained, unlicensed recreational operators of pleasure boats. Is it really your intention to create the seeds of deteriorating maritime safety? I hope not.

Therefore NPBOA is totally opposed to Amendment 47 specifically as stated above and also in agreement with those who point out other reasons. It's a bad idea and it belongs in the “Bad Idea File” That's the round one next to the desk.

Very truly yours,

Capt. Brad Glas
Pres. NPBOA



July 27, 2018

Charlie Phillips, Chair
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Charlie,

I write to once again ask the South Atlantic Fishery Management Council to stop its efforts to pursue for-hire limited entry, this time through Snapper-Grouper Amendment 47.

We are especially troubled that the SAFMC is now considering not just limiting, but decreasing the number of charter and headboats in Amendment 47.

The SAFMC has pursued for-hire limited entry over the last two years despite overwhelming opposition. Hundreds of fishermen and other affected fishery stakeholders have submitted comments to the fishery council meeting after meeting in opposition of for-hire limited entry, with very few in support, yet the council continues its push.

It is time the SAFMC listened to these stakeholders, particularly on a proposed management measure that has nothing to do with fishery sustainability and is not required under the Magnuson-Stevens Act.

The SAFMC keeps pushing limited-entry despite the fact that the number of snapper-grouper for-hire permits has remained virtually unchanged over the last 10 years and for-hire fishing effort in federal waters is 22 percent below the effort in 2007.

This indeed has nothing to do with fishery sustainability. A limited-entry fishery is the first step toward a catch share fishery, one that will set up a "stock market" for permits.

The SAFMC should look to what is happening to Gulf of Mexico charter and headboat operators under a limited entry program. In a December 5, 2016 email to the SAFMC in opposition to for-hire limited entry, the president of the National Association of Charterboat Operators describes the for-hire limited entry disaster in the Gulf of Mexico, stating that the *"limited entry program has resulted in an additional stock market for fisheries"* and is *"working to eliminate for hire vessel owners from the industry."*

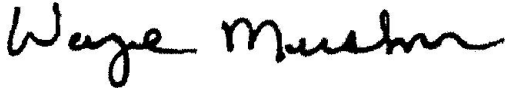
OPTIMIZATION AND SUSTAINABILITY
FOR THE RECREATIONAL AND COMMERCIAL FISHING INDUSTRY

POST OFFICE BOX 2398 | MURRELLS INLET, SC 29576 | (843) 879-8585 | SUSTAINABLEFISHING.ORG

Surely this is not what the SAFMC wants to force on the for-hire fleet.

We again ask the SAFMC to listen to the overwhelming opposition from fishery stakeholders and stop its efforts to implement for-hire limited entry.

Respectfully,

A handwritten signature in black ink that reads "Wayne Mershon". The signature is written in a cursive, flowing style.

Wayne Mershon
President

Lee Hewitt

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Committee:

Agriculture, Natural Resources and
Environmental Affairs

House of Representatives

State of South Carolina

July 31, 2018

Charlie Phillips, Chair
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Mr. Phillips,

I write to express my opposition once again to limiting or decreasing the number of charter and head boats in the snapper-grouper fishery.

Based on the data I've seen, there is no scientific justification for for-hire limited entry in the South Atlantic. The number of snapper-grouper for-hire permits has remained virtually unchanged over the last 10 years and for-hire fishing effort in federal waters is 22 percent below the effort in 2007.

Fishery sustainability is not in question with the for-hire snapper grouper fishery.

The charter and head boat operators I know are very concerned about the South Atlantic Fishery Management Council creating a stock market for for-hire permits with limited entry, one that would lead to a for-hire catch share program resulting in fleet consolidation and the loss of many fishing jobs.

As the SAFMC has pursued for-hire limited entry over the last two years, the opposition from fishery stakeholders has been overwhelming and consistent. Hundreds of fishery stakeholders have gone on record with comments to the SAFMC in opposition. Please listen to these stakeholders.

In my youth, I worked as a deckhand on numerous charter and head boats out of Murrells Inlet, so I'm very familiar with the business and its economic importance to the coastal district I represent, which stretches from Murrells Inlet to Mt. Pleasant.

The last thing that is needed is to limit or decrease the number of charter and head boats.

On behalf of the constituents I represent, I ask the SAFMC to stop any further consideration of imposing for-hire limited entry in the snapper-grouper fishery.

Respectfully,

Rep. Lee Hewitt

CC: Alvin Taylor - SCDNR

STEPHEN L. GOLDFINCH
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MURRELLS INLET, SC 29576

August 1, 2018

Charlie Phillips, Chair
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Mr. Phillips,

On behalf of my constituents in coastal South Carolina, I write to express my strong opposition to limiting or decreasing the number of charter and head boats in the snapper-grouper fishery.

There is no biological or scientific rationale for for-hire limited entry. As the South Atlantic Fishery Management states in Snapper-Grouper Amendment 47, the number of for-hire snapper-grouper permits issued over the last 10 years has remained "fairly steady."

According to MRIP data, for-hire fishing effort in federal waters in 2017 was 22 percent below the effort in 2007. There is no fishery sustainability issue.

Over the two-year period in which the SAFMC has considered for-hire limited entry, the proposal has been met consistently with overwhelming opposition from fishery stakeholders. The SAFMC needs to listen to these stakeholders.

Since there is no biological or scientific rationale for for-hire limited entry, fishery stakeholders are legitimately concerned that the ultimate purpose of limited entry is to establish a for-hire catch share program, one that would establish a "stock market" for permits and result in a consolidation of the for-hire fleet, destroying jobs.

Lastly, in approving the South Atlantic For-Hire Electronic Reporting Amendment, the SAFMC acknowledged the need for more accurate and timelier for-hire catch and effort data than is now being produced by the MRIP for-hire surveys. The SAFMC needs to comply with the "best scientific information available" requirement in National Standard 2 and wait for the upcoming for-hire electronic reporting data, before considering any further management measures on the for-hire fleet.

I ask the SAFMC to listen to fishery stakeholders and stop any further consideration of imposing for-hire limited entry in the snapper-grouper fishery.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen L. Goldfinch".

Senator Stephen Goldfinch

SG/vgw

CC: Alvin Taylor



South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

August 16, 2018

Dear Chairman McCawley,

The North Carolina Watermen United (NCWU) is opposed to the Snapper Grouper Amendment 47 Modifications that would limit entry into the federal For-Hire charter/headboat Snapper Grouper fishery. I have talked with fishermen up-and-down the North Carolina coast from Atlantic Beach, Morehead City, Wanchese, Manteo and Hatteras. None of them wants limited entry.

We believe that this is a step toward Catch Shares or Individual Fishing Quotas (IQF) and have never supported these proposals, as both can lead to large corporate interests buying up the available permits at prices that individual and "small business" fishermen cannot afford.

Also, NCWU represents all three sectors of fishermen – Commercial Harvesters who make their living on the water and are highly regulated in both state and federal waters, For-Hire Charter/Headboat operators who also earn their living on the water and are highly regulated and accountable to both federal and state agencies and Recreational - the fastest growing Sector - that fishes for "fun and dinner," but only has a very small percentage of catches and landings reported. Until there is better data on this Sector of fishing, we do not want to see any modifications to limit entry into the fishery for the For-Hire Sector.

Thank you for your continuing work with the Snapper/Grouper fishery.

Yours truly,

Capt Sonny Davis

Capt Sonny Davis
NCWU Board of Directors
info@captstacy.com
252-725-0784

SD: mm

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August 17, 2018

Gregg Waugh
Executive Director
SAFMC
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Director Waugh:

The American Sportfishing Association (ASA) appreciates the opportunity to provide scoping comments to the South Atlantic Fishery Management Council (SAFMC) on Snapper Grouper Amendment 47 (For-Hire Permit Modifications).

ASA opposes a moratorium on for-hire permits in the South Atlantic. With permit numbers relatively steady (and even declining in some states) over the last ten years, it is difficult to identify the need for any Council action on this issue. The Council's stated goals of stabilizing participation and business planning in the for-hire fleet do not appear to be applicable considering the already-present stability.

Increases in permit numbers have become evident only over the last two years in Georgia and the Florida Keys, and are most likely attributable to a "run" on acquiring permits after the Council began discussions on limiting Snapper Grouper for-hire permit numbers.

It is not clear that a moratorium on snapper grouper for-hire permits is the best or only path forward to achieve the other stated goals of the Council. For most of the Council's remaining stated reasons for action, other less restrictive actions could be employed without restricting access to public resources.

For example, improving reporting compliance and recreational data quality could be achieved by numbering and tracking existing permits along with criteria that would prohibit renewal or acquiring a new permit if there are outstanding violations. Professionalizing the for-hire fleet could be addressed by requiring an apprenticeship or specified landings prior to being granted a permit.

Limiting or reducing the number of available permits in an attempt to decrease fishing pressure on some stocks (e.g. red snapper) reduces access across the board for all snapper grouper species. Many of these other species are not in a situation where decreased fishing pressure is necessary. ASA supports addressing concerns about specific species (e.g., red snapper) through other fisheries management measures such as season length, bag limits,

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or other alternatives-but not by limiting participation- especially when participation is stable to begin with.

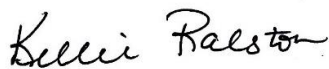
In addition, some of the concerns expressed by for-hire operators, such as captains operating without a permit, are enforcement issues that will not be addressed by restricting participation. Increasing enforcement and fines for violators would be more effective deterrents than limiting permit numbers, considering that offenders are not acquiring permits anyway.

Overall, restricting or potentially reducing the size of the for-hire fleet is unnecessary, sets a dangerous precedent and will decrease opportunities for anglers who depend on those operators to access a public resource. Without sufficient biological or socioeconomic justification, a moratorium is an unnecessary action that will likely lead to divisiveness in the recreation sector.

In conclusion, ASA opposes a moratorium on for-hire snapper grouper permits at this time and encourages the Council to explore other options to achieve its goals.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Kellie Ralston". The signature is written in a cursive, flowing style.

Kellie Ralston
Florida Fisheries Policy Director
American Sportfishing Association