

Vision Blueprint Regulatory Amendment 27 Public Hearing Comments

Key West/commercial/for-hire: The Shallow Water Grouper closure from Jan 1-May 1 doesn't work and will never work! We are killing groupers full of roe. When we start harvesting grouper in south Florida they are full of roe even through June. Consider opening the fishery Jan 1 for South Florida, our fishery is different than NC. Grouper are not spawning then and the market is in line with tourist season. Which leads to better pricing for the fisherman and their families.

Deep Water Split season- no way. Proposed changes do not work for fisheries in south Florida. We don't need one more thing to check on or have to watch even one more ACL of 2 seasons per year. We can't catch shallow water grouper when they are here in January and the weather is good. So it's only fair that we can catch deep water fish in the winter months and not get shut down early waiting on good weather for fishermen up north.

Morehead City/commercial: One way to know if trip limits are set at the appropriate level is if any quota is allocated to projected post-closure dead discards. Since the trip limit for Gag Grouper seems to be working, can we get back the 27,218 pounds of annual quota that is currently allocated to projected post-closure dead discards? We need to adjust the Vermilion Snapper trip limits so it is no longer necessary to allocate 35,000 pounds of quota each year to projected post-closure dead discards. Same goes for Greater Amberjack trip limits and dead discard allocations.

Putting a size limit on Almaco Jacks would do nothing more than increase regulatory discards while reducing stock assessment data.

Red Grouper should be managed as a by-catch fishery until the stock rebounds. It would be better to leave the Red Grouper spawning season closure as it is and put a 100-pound trip limit on them. Extending the spawning closure for one species could result in increased regulatory discards as fishermen target legal grouper.

Red Porgy should have a reduced trip limit during spawning season instead of a total closure.

Jupiter/commercial: Support of all the split seasons and 500 pound trip limit for the jacks complex. Definitely would like to have some availability of snowy grouper to local markets and restaurants in the summer.

Morehead City/Commercial/dealer:

Action 1: With such a small ACL for blue line tile fish, I suggest just allowing a 50-100lb by catch year round. It is important for this fishery to be open during the snowy grouper season as we catch these fish together.

Action 2: I support no action to the current snowy grouper season. As a fisherman and a wholesaler/retailer, we rely on snowy grouper during the winter months while the shallow water species are closed. I would be fine on increasing the trip limit to 250-300lbs.

Action 3: I am in agreement with the council on preferred 2c. 1000lbs per season with a split season would be great. Here in NC, we need an amberjack fishery in the fall as that is when we have the most large fish close to shore.

Action 4: The only action I would suggest here is to allow a 50-100lb by catch of red porgy during the Jan-Apr period, but to pretty much keep it like it is.

Action 5: I support Alternative 4c. I believe this would give our fishermen the best chance of having a year round fishery for this important economic fish. Also, we would have vermillion snapper for retail markets and restaurants year round without several month closures.

Action 6: I am in agreement with the council for preferred alternative 2a. A 20" almaco is approximately a 5lb fish. That size fish is big enough to fillet for a restaurant or use in a retail market. The tiny almaco jacks we are currently harvesting have little value and are a waste for the industry.

Action 7: I agree with preferred alternative 2a. A 500lb trip limit would allow us to catch jacks more year round without an early summer closure. In NC, we catch a lot of large almaco jacks in the fall inshore and it hurts when we have to throw back 300-500lbs a day.

Action 8: I am fine with preferred sub-alternative 2a. I would like to see Red Grouper stocks rebuilt to what we had in the 1980s and 1990s. I would suggest a trip limit of a couple of hundred pound to help with rebuild this fishery.

Action 9: I have no problem removing size limits for certain species in deep water.

Action 10: No action necessary. Lets save the big fish to lay eggs and rebuild the stock before we start harvesting small fish.

Ormond Beach, commercial/dealer: see letter attached.

Fort Lauderdale, commercial/dealer:

Action 1- Blueline Tilefish. This species of fish needs to be aligned with the Snowy Grouper in order to reduce discards and make trips more profitable for the fisherman.

Action 2- Snowy Grouper. Once again this species of grouper needs to align with Blueline Tilefish.

Action 3- Amberjack. I would like to see it remain at 1200 lb. trip limit with a step down to a bycatch fishery at 75% of ACL such as 500 lbs or maybe even 300 lbs. My preferred from your list would be Sub-alternative 2a. Season 1 trip limit equals 1,200 pounds whole weight, Season 2 trip limit equals 1,000 pounds whole weight.

Action 4- Red Porgy. Sub-alternative 3c. 60 fish looks good to me or why go with Alternative 4. Remove the harvest and possession restrictions, and sale and purchase prohibition for red porgy

from the South Atlantic exclusive economic zone during January 1 to April 30 each year. Specify a commercial trip limit of 120 fish from January 1 through December 31.

Action 5-Vermillion Snapper. For the Traditional Bandit Boats we need the largest trip limit available. a reduction at a certain % of the ACL to a bycatch fishery would be a good idea in my opinion.

Action 6- Almaco Jacks. I don't think this species needs a size limit implemented on them.

Action 9- Remove the commercial minimum size limits for certain deep-water species. This is definitely a good idea to reduce dead discards in this fishery.

May 8 Webinar and Listening Station Comments:

Webinar attendees: 15 members of the public/AP members

Wilmington Listening Station: 4 members of the public (no comments)

Charleston Listening Station: 3 members of the public (no comments)

Jacksonville Listening Station: 2 members of the public (no comment)

May 9, 2018 Webinar and Listening Station Comments:

Webinar attendees: 7 members of the public/AP members

Morehead City Listening Station: 3 members of the public/AP members (2 comments)

MR. COX: This is Jack Cox, commercial, North Carolina. This amendment has been a long time coming, and so I think we're fine-tuning some of this stuff, and I'm happy to see a lot of the alternatives that the council is considering, and most everything looks like it's just about perfect. I would like to say, on the vermilion, that, here in our area, and, of course, it's different for different areas, but 700 pounds in both seasons, Action 5, Alternative 4c, no step-down, would certainly work for us. We don't have quite as far to go as some of the other boats. It's in the season, and so we wouldn't have the discards that we do now in encountering them.

As far as the almaco, it's great to see the preferred at 500 pounds and the twenty-inch size limit. That would be about a five-pound fish, and it would be a good value for those fish. Those smaller fish aren't worth what -- As far as red grouper, we've got a lot of work to do with rebuilding, and I think this is a step in the right direction with the fishery and the spawning season through May, and I think we could consider adding a smaller trip limit in as well. That is certainly a rebuilding plan that I think would work well with the other shallow-water grouper, because, at least here, we can target red grouper without interacting with a lot of other species.

As far the greater amberjack, I would like to see the thousand-pound trip limit that is being considered as the preferred by the council in both seasons, and I think that's fair and equitable for the all the different regions. We have a season where that split season in the fall doesn't give us an opportunity to interact with those fish later in the year, and there's an increase in value now that last year the Gulf was closed, and I'm happy to see that.

As far as snowy grouper, a 70 percent split season early in the season and 30 percent later certainly looks like something that will work well, and the guys will appreciate having some

snowy when they're interacting with the other species, and -- That will work just fine. Thank you for the opportunity to comment.

MR MCCAFFITY: My name is Chris McCaffity, and I'm a commercial fisherman out of Morehead City, and I would like to thank the council for doing this project, and, like Jack said, it's been something that a lot of fishermen have been asking for, and I appreciate that you're listening and making some pretty good decisions on a lot of these things. I will start with the blueline tilefish. It looks like -- I don't see why we don't just have the 100-pound trip limit for both seasons. I mean, they're predicted to have a closure by going to a 300-pound trip limit, and so it's kind of counterproductive. It should be more of a bycatch fishery than a targeted fishery. It should be something that you just catch in with the snowy grouper. You want to make sure that both of those fish are legal at the same time, so that you don't end up targeting one and throwing back the other.

I think the split for the snowy is good. You've got something through most of the year that way, and, for the red porgy, I'm glad to see that you all are going to a bycatch allowance, basically, for that, for the spawning season, rather than having the total closure. I would think that maybe for the second part of the season that just going to a 100-fish limit would help to extend that season, and then it might be a fifty-fish limit in the first part, so that we're not having so many discards there and a total closure at the end.

The red grouper, I really don't think we should mess with the spawning season closure going until May, because it's just Florida and Georgia can keep them, and North Carolina and South Carolina can't, and there is some conflict there. I would rather see a 100-pound bycatch allowance, since it's going to such a low quota, right around 60,000 pounds. We don't need a 1,000-pound trip limit for a quota that low. It absolutely needs to be addressed as you make that reduction.

The almaco jack, I think that I personally don't like the size limit. I eat some of them, under the recreational limit, and the bigger ones end up having worms sometimes, and the smaller ones are the ones that are better to eat. I probably would prefer the 300-pound limit or the 500 pounds.

With the vermilion snapper, I think the 700-pound trip limit without a reduction would be a little simpler. It seems like that would probably extend the season a little better, and it would be fair to pretty much everybody, especially the bigger boats that go out for a week at a time. If we've got everything legal to keep, we can put a trip together, and it doesn't have to be all b-liners. That way, it keeps the price better for everyone, and it gives the consumers a better quality product, since the market is not flooded with so many at one time, and it's just kind of a win-win for everybody. Personally, I would like a 500-pound limit, but I think, to be fair to everybody, a 700-pound would be better. I think that was a wise move on removing the size limit on those three species of deepwater snapper. I think that covers pretty much all of it, but, once again, thank you for listening to the fishermen and going forward with this project.

Cocoa Beach Listening Station: 1 member of the public (no comment)

May 10, 2018 Webinar and Listening Station Comments:

Webinar attendees: 4 members of the public/AP members

Cape Hatteras Listening Station: 7 members of the public (1 comments)

MR. HEMILRIGHT: This is Dewey Hemilright. Thanks for the opportunity to comment. The fishery that is kind of unique up here, which I consider above Cape Lookout, is your briefing paper doesn't kind of reflect how it takes place, the fishing, and what's available. Some of your charts do, as far as what's caught historically and what's caught now. I am under the belief that, given some of the blueline tilefish and different things that we've experienced and management issues north of Cape Hatteras, we have lost probably about five permits, and so I don't know if this is the exact number, but, probably north of Cape Lookout, there is probably only about twelve snapper grouper permits that are actively being fished or left fishing, and so we've watched our fisheries reduce.

What happens north of Cape Lookout is not necessarily -- It could be dramatically different than what happens south of Cape Lookout, and I would go with the preferred alternative, even though I think it's kind of premature and the council probably should have waited until after the stock assessment for doing any changing. It also kind of frustrates me a little bit that none of this is based on any observed data, any logbook data, or any bycatch logbook data that I am required to fill out. I have problems with that, and I'm hoping that the council, in the future, is going to manage the fisheries based on some logbook data that we have to fill out for our permit requirements, and so, with blueline tilefish, I would be in favor of the preferred alternative.

For the next, with snowy grouper, I kind of feel like the 70/30 is a little too the extreme. I feel like it should be more like 60/40. I have watched a shift in the fishery, where it was prosecuted at mostly, and, also, the size of the fish. I wish that the council would look into the size of the fish being landed in certain areas and give an analysis on that.

I think it would help paint a picture, because, up and down our coast, particularly in North Carolina, and maybe some of the other states, all fisheries, one size does not fit all, and so it appears like some of these things are trying to fix and manage in one area where, in the other areas, they don't have access to all the other fish, like the times of the year, because, north of Cape Hatteras, in the wintertime, you are not catching blueline tilefish, because there are so many sand sharks, and so you have a lot of fluctuation there.

It appears like even you all's Preferred Alternative 2 -- The season right now is at 62 percent, I think, it was, and you've got to go June 30, and so it's going to be closed down probably in the next -- I don't know what the percentage is that it's closed down at, 80 or 90 percent for grouper, but it doesn't have much longer, and so it's not going to last out, looking at your prediction, but I guess, also, I just heard that the fishery gets increased another 20,000 pounds next year.

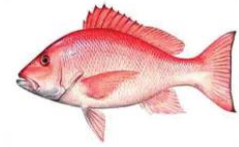
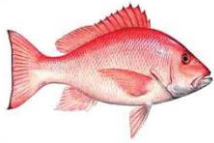
As far as the split season for grouper, I think it should be -- The alternative I prefer is Number 2, and I don't really have any comment on the other actions, but I do wish, in the future, that this information would be based on -- Anecdotal information from fishermen is great, and it's awesome, and it can lead to new things. It can lead to help, but we take observers, and you've got logbooks, and you've got bycatch reports, and I see none of that for the information, and so those are my comments, and thank you for allowing me to speak.

Given that you showed where the states up here, the different states and their landings, how about give an analysis of the discards for the different states and regions where this is happening at, and I think it would give a clearer picture, and it would also help on some of the fundamental arguments that different sections of a state might have and different fishermen, to say, hey our fishery is -- Not that one is better than the other, but we have other things that we can't fish this time of year, for sharks, and so here you've got an amendment kind of driving a discard issue problem that might not be in a certain area, and so, the more clear that you can show that to the public, the more you can flesh out maybe some possibly shenanigans or something going on of our fisheries, because, up in the northern end, our fleet is reducing, and the permits -- There is less permits, and so anything that would show a clearer picture to the public, because it appears like we're going in more of a direction to specific areas and different things of what is happening, and one size does not fit all, and so thank you for that. I hope you pass that back to the council about putting that type of data out there, and a clearer picture is a lot better. Thank you.

Murrells Inlet Listening Station: 1 attendee (no comments)

Marathon Listening Station: no attendees

SOUTHEASTERN FISHERIES ASSOCIATION



East Coast Fisheries Section

11 May 2018

Mr. Gregg Waugh, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive; Suite 201
North Charleston, SC 29405

Re: Vision Blueprint Commercial Regulatory Amendment 27 to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region

To: Mr. Gregg Waugh and the SAFMC Voting Members,

The Southeastern Fisheries Association, East Coast Fisheries Section submits these preferred alternatives to the ten proposed actions found in the proposed Vision SG Regulatory Amendment 27 for commercial fishing changes.

Thank you for this opportunity to comment.

Jimmy Hull, Chairman
SFA ECFS
111 West Granada Blvd.
Ormond Beach, FL 32174-6303

1. Establish a commercial split season and modify the commercial trip limit for blueline tilefish

Preferred Alternative 3. Retain the January 1 through December 31 commercial fishing year for blueline tilefish in the South Atlantic exclusive economic zone. Modify the commercial trip limit for blueline tilefish:

Preferred Sub-alternative 3a. 100 pounds gutted weight from January 1 through April 30 and 300 pounds gutted weight from May 1 through December 31.

2. Establish a commercial split season for snowy grouper

Preferred Alternative 3. Specify two commercial fishing seasons for snowy grouper. Allocate the snowy grouper commercial annual catch limit into two quotas: 70% to the period January 1 through June 30 and 30% to the period July 1 through December 31. Any remaining quota from Season 1 would transfer to Season 2. Any remaining quota from Season 2 would not be carried forward.

3. Establish a commercial split season and modify the commercial trip limit for greater amberjack

Preferred Alternative 2. Specify two commercial fishing seasons for greater amberjack. Allocate the commercial annual catch limit for greater amberjack into two quotas: 50% to the period March 1 through August 31 and 50% to the period September 1 through the end of February. Any remaining quota from Season 1 would transfer to Season 2. Any remaining quota from Season 2 would not be carried forward. During April each year, no person may sell or purchase a greater amberjack harvested from the South Atlantic exclusive economic zone.

Preferred Sub-alternative 2c. Trip limit equals 1,000 pounds whole weight in both seasons.

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4. Establish a commercial split season and modify commercial trip limit for red porgy

Preferred Alternative 2. Specify two commercial fishing seasons for red porgy. Allocate the commercial red porgy annual catch limit into two quotas: 30% to the period January 1 through April 30 and 70% to the period May 1 through December 31. Any remaining quota from Season 1 would transfer to Season 2. Any remaining quota from Season 2 would not be carried forward. Remove the sale and purchase prohibition during January 1 to April 30 each year. Retain the commercial trip limit of 120 fish from May 1 through December 31 and specify a commercial trip limit from January 1 through April 30 of:

Preferred Sub-alternative 2c. 60 fish

5. Modify the commercial trip limit for vermilion snapper

Preferred Alternative 4. Modify the commercial trip limit for both seasons and remove trip-limit reductions:

Preferred Sub-alternative 4c. 700 pounds

6. Implement a minimum size limit for almaco jack for the commercial sector

Preferred Alternative 2. Specify a minimum size limit for almaco jack for the commercial sector:

Preferred Sub-alternative 2a. 20 inches fork length

7. Implement a commercial trip limit for the Other Jacks Complex

Preferred Alternative 2. Establish a commercial trip limit for the Other Jacks Complex.

Preferred Sub-alternative 2a. 500 pounds gutted weight.

8. Modify the seasonal prohibition on commercial harvest and possession of red grouper in the Exclusive Economic Zone off South Carolina and North Carolina

Preferred Alternative 2. Maintain the annual January 1 to April 30 prohibition on sale and purchase of shallow-water groupers harvested in the South Atlantic exclusive economic zone, except for red grouper. Prohibit sale and purchase of red grouper harvested from the exclusive economic zone off North Carolina and South Carolina from:

Preferred Sub-alternative 2a. January – May (five months)

9. Remove the commercial minimum size limit for certain deep-water species

Preferred Alternative 2. Remove the 12-inch total length commercial minimum size limit for queen snapper, silk snapper, and blackfin snapper in the South Atlantic exclusive economic zone.

10. Reduce the commercial minimum size limit for gray triggerfish in the Exclusive Economic Zone off East Florida

Preferred Alternative 2. Reduce the commercial minimum size limit for gray triggerfish in the exclusive economic zone off the east coast of Florida to 12 inches fork length.