

**PUBLIC COMMENT SESSION
WEBINAR
JUNE 16, 2021**

MS. RALSTON: Council members and staff, I'm Kellie Ralston, representing the American Sportfishing Association. I really appreciate the opportunity to give public comment today. I would like to offer our support and appreciation for the council's involvement in the Joint Alternative Management Workgroup with the Gulf Council. We've seen great progress there, but I would also encourage you to continue to push the envelope with that workgroup, for alternatives, especially with the definition of ACL, and, also, we encourage the identification of pilot programs that can explore that concept more fully and potentially allow greater management flexibility to rebuild stocks.

I think your own workgroup on improving recreational harvest estimates is also making really good progress. The consensus of developing a product that coordinates with MRIP and the states is a wonderful goal, and it's also a great opportunity to tie into discard mortality and descending device efforts, as you discussed today, in the region, particularly for snapper grouper species, and we look forward to continuing to work with you and the agency on developing options and on funding and implementing, once we get to that phase.

Generally, we support the council's preferred options on Dolphin Amendment 10. I wanted to highlight two things, especially the region-wide recreational vessel limit compromise of ten per person and forty-eight per vessel that the council came to at your last meeting, and, also, I commend you on how to address allocation discussions, incorporating MRIP-FES recalibration numbers. You really showed how it could be done, and how it should be done, by making numerical corrections to the allocation first to incorporate the new historical recreational estimates and then discussing management decisions on how or if to adjust those allocations.

Regarding red snapper, I'll start off with the Great Red Snapper Count. We're certainly grateful for the additional funding that has allowed this study by Congressmen Rutherford and Murphy, and we're interested to see what that fuller picture of Atlantic red snapper looks like in the final product. Also, I appreciate Genny's comments about the Great Red Snapper Count and how to incorporate those results into management. We certainly encourage the council, and the agency, to work with the SSC early and often on how best to do this.

I had a lot of other comments about red snapper, but I decided to scrap them, after the great discussion today, and just say thank you. We fully support the response items paper that you all are working on, and we really think it's a well-thought-out plan, both for the short-term and long-term options, and so great job by council and staff. We really appreciate that. Finally, thank you for all you do, and, as Mel was saying, I really look forward to seeing you all in person this September in Charleston. Thank you.

MR. HUDSON: Tomorrow is our king mackerel discussion, and the Coastal Migratory Pelagic Amendment 34, and our AP had a very detailed set of comments, with regard to the very positive stock assessment, and so I will just defer to the AP, as a member, of what we shared, and I hope the SSC sees the wisdom of those thoughts.

Getting into this deepwater longline survey, dealing with golden tile, I don't know how you're going to work it, but some of those small peeweels, as Ben Hartig called them, that don't usually get caught outside of 550 foot, 600 foot, and they're more back inshore, that first expanded Oculina area is going to be a problem, because you can't use longline legally in there, unless you can get an exemption, and that's where you're going to have to go find them, in that 400 and 450 and stuff like that. Once you get to the northern Oculina, that only goes out to about 330 foot, but the problem is there's a lot of hard bottom offshore of that Oculina area.

Shifting gears and talking about the Oculina, there is some wonderful gag and speckled hind, or kitty mitchell, as we called them, and warsaw and big red porgies that love to live all through that southern and northern Oculina regions, and so just figure that's insurance in the bank, but you need to find a way to research all that, particularly those depths 225 to 330 foot.

The red snapper otoliths that were provided to us, having participated in SEDAR 73, as well as everything else back in time, except 15, 21,163 zero-plus-age recreational otoliths taken between 1977 and 2019. 9,542 commercial otoliths of age-zero-plus taken from 1992 all the way to the present, and the twenty-plus years olds -- We had seventy-seven recreational and sixty-three commercial, total, for 140, a grant total of those animals that were twenty-plus years old, which are going to be sows. In 1989, I got on a bite of sow snappers and they all look the same. I caught 4,000 pounds in three hours, and so we fished it for a month. You're not going to find them with the baby one to three-year-old red snappers, or maybe an odd one, but I just wanted to educate you on some of that, and I appreciate the ability to comment, and I look forward to king mackerel tomorrow. Thank you.

MR. ENGLISH: Thank you, all. I am going to speak a little bit on Spanish mackerel, and that's kind of what I always talk about. We recently had a citation written to a guy on Spanish mackerel, and it wasn't a citation, but it was a warning, luckily, for the fella, but it led us to believe that the way we've been fishing these, our nets for forty years, is no longer the case.

We tried to research a bunch of it, and Christina did a lot for us, and it can be interpreted one way or another way, depending on if you're the fisherman or the enforcement officer, and there is stuff in there that is kind of ambiguous and we think we need to get clarified, because the honest fishermen in this fishery -- We want to follow the rules, and we want the rules to be uniform and fair to everybody.

I have spoken with several of the fishermen, and we think we want to maybe revisit the way the rule is written for gillnets on Spanish mackerel and see if we can't tweak them and make them fit a little better to what we're doing and what we have been doing for twenty years and clarify to where there is no discrepancy between the fishermen and enforcement, and so I'm sure we'll be bringing that to you with the next meeting we have, and hopefully we'll have an AP meeting, and we can get a pretty good discussion on it and see if we can't clarify a bunch of stuff on it.

Our fishermen, like I said, most of them are legal fishermen, and they want to follow the rules right, but you've got that one or two that don't, and, if the rules aren't accurate, and easy to read, the couple that don't follow the rules rub it in the face of the fishermen who do follow the rules, and, eventually, the honest fishermen have to become dishonest to keep up, and we don't want that. That's the last thing we want. Anyhow, in the future, we'll be -- I'm sure we'll be bringing

you some modifications on the gillnet fishery for Spanish mackerel, and we appreciate your time listening to us. Thank you.

MR. BAUGESS: My name is Ken Baugess, and I'm a recreational fisherman. I reside in southwest Florida, on the Suncoast, here in Sarasota/Bradenton, and I frequently go to the Keys to mahi-mahi fish, and so my comments today will hopefully impact your decisions, or directions, toward longline fishing for mahi-mahi.

We've been going down, myself, for five years in a row, with some friends, and I imagine that, in those five years, we've spent well in excess of \$20,000 or \$25,000 fishing, and so we're avid recreational fishermen, and I do a lot of other fishing, and I do a lot of catch-and-release fishing, and it just burns me to hear that they're thinking of increasing the number of fish that can be taken, mahi-mahi, through longlines.

I don't even know how they would release undersized, or if they do on longlines, and I don't know how that would happen, but, anyway, we have noticed, in the five years we've been going down fishing for mahi-mahi, the numbers and the quality of fish has decreased dramatically. We just returned just a couple of days ago from a trip mahi-mahi fishing, and our charter captain worked his butt off, and they did get us some mahi-mahi, but no large ones whatsoever, and we didn't even see any, let alone catch any, and we released several undersized fish, and so it's noticeably different and a lot less fish than there's ever been.

As a taxpayer and a recreational fisherman, it just burns me to think that we're going to allow this wonderful fishery to be depleted by longlines, which I find -- I don't even know how that works. Like I said, how would you ever release undersized fish from a longline?

The same thing is happening up here in southwest Florida with the red snapper count. We, as recreational fishermen, are limited to two, and we can't do any more than that, and they've got to be fifteen inches, but I don't think the same rules apply to commercial fishing, and so, as an individual, and a taxpayer and a recreational fisherman, I find it hard to believe that we're going to increase the amount, potentially increase the amount, of fishes that can be taken, mahi-mahi, through commercial fishing and harm, greatly harm, our recreational fishermen and a wonderful industry, and so hopefully I'm not too negative, but hopefully I'm negative enough, because it really does tick me off, and I hope there's something -- That you guys can do something about it, and I appreciate your time, and thank you for letting me speak.

MR. REYNOLDS: Thank you for this opportunity to comment. I am President of the South Atlantic Fishing Environmentalists, representing a large group of charter fishermen, hook-and-line commercial fishermen, and the recreational industry. My comments are concerning issues with the dolphin fishery, and the council is operating without a formal stock assessment, and they should operate under extreme caution, with risk-averse measures and recreational opportunity as the highest priority.

Assessing the stock utilizing catch data is an extremely unreliable way to implement management measures, and the risks and consequences of these decisions should weigh heavily on the council's decisions. Increasing coastal populations, advanced technology, higher demand for dolphin on charters, and increasing commercial pressure on this species brings great concern for both the health of the stock and that many fishermen are communicating this.

We have been engaged, since the beginning, when Amendment 44 came out, and on the record speaking and leading into Amendment 10, and we strongly encourage the council to act to avoid serious negative biological and ecological consequences, especially when the regional biomass is unknown.

Like myself, as a full-time fisherman, which I am, and I am full-time charter fisherman and hook-and-line commercial fisherman, and the council has a greater responsibility to this fishery than industry requests. The recreational fishery for dolphin in Florida alone equates to nearly \$300 million annually. Tagging data concludes that the dynamics of this movement within our region allows every component to cause direct impact to another component.

Respected scientific experts warn of overfishing, due to perception of high tolerance of a species. Various scientific studies conclude that the waters off of North Carolina are a hotspot for large, breeding fish, and they spawn in May and June. The fish landed in this region play a large role in the overall reproduction and biomass, and large landings cause a direct and negative impact on the overall stock, as well as negatively impact and direct interaction with all other opportunity for all other users of the resource.

Any proposals to increase ACLs would be careless, in the absence of a stock assessment. The current proposals would allow increased landings for both the recreational and commercial sectors. SAFE strongly recommends that the council takes the following actions: Action 1, no action; Action 2, no action; Action 3, Alternative 3; Action 4, no action; Action 10, Alternative 2 and 3; Action 11, Alternative 2, Sub-Alternative 2c.

We also recommend size limits in the Gulf and the entire Atlantic. We've been dealing with these size limits for years. We de-hook fish with de-hookers, and it's very easy. The fish live well, and so we also would like to mandate de-hookers onboard all fishing vessels fishing for dolphin. A commercial trip limit of no more than 2,000 pounds, and SAFE would also like to strongly recommend a slot limit on shallow-water groupers in Florida, to keep the large breeding stock alive to create greater stock. Thirty-three inches is the recommended size limit of the upper slot. Thank you very much. We'll working our butts off to report and try to get in better data, and I know the council is working very hard, and thank you.

MR. GRAVITZ: This is Michael Gravitz speaking, and I work at Marine Conservationists, a scientific marine conservation organization founded in 1996 to preserve wild ocean places, and we have some specialization in deep-sea corals. I, first off, want to commend the Habitat Committee, and this entire council, for your previous actions to protect deepwater corals in places like the Stetson Marine Terrace Coral HAPC, the Portales Terrace HAPC, and others, and I will be talking about the proposed Coral Amendment 10.

Second, we oppose, as I believe other people will, the expansion of rock shrimp fishing into the eastern edge of the northern Oculina HAPC. We just think it's a bad precedent to go back and undo something that you did quite a long time ago, and we wonder what other kind of HAPC incursion sort of options, or requests, you will get from other fishing groups that would like to go into other HAPC areas, and we just think it's a really bad precedent to start nibbling away at HAPC areas that were established at really great cost years ago, and we would recommend that we don't think you would want to deal with other amendments like this continuously.

Second, there is a very narrow margin for mistake here. The incursion areas that's been proposed ranges from 183 meters to 808 meters, and that's two to eight football fields wide, and one question that I would have is, while this fishing occurs at night, what happens if someone is asleep, or inattentive, while they trawl for rock shrimp? Even presuming, which we don't grant, that the area proposed for opening has no corals, trying to stay within a two-to-eight-football-fields-wide strip that's been proposed for opening may be tough, especially in high winds, high currents, and that's just too close to the existing reefs. We wonder what kind of additional enforcement mechanisms you might put in place, or are thinking about, should you open this area.

Fourth, the decision document presents very little information on the issue of sediment drift, and what information that it does present suggests that sediment drift could exceed the width of this area that you're opening up, and therefore hurt the corals.

Fifth, and really importantly, there is no visual evidence from bottom surveys that the low-relief areas of the HAPC that are proposed for opening either contain small *Oculina* reefs recovering from prior damage, *Oculina* rubble from prior trawling, or just mud and sand. In fact, the multibeam mapping resolution that your data has, and your maps are based on, is from five to forty meters, and so even a one-meter-high *Oculina* colony, that could be seventy-five or a hundred years old, wouldn't show up on your maps, and you would be trawling it.

Finally, there is no estimated economic benefit, and so I would ask the question of is it really worth the potential to destroy this wonderful resource and hurt this unique resource along a twenty-two-mile strip for a kind of uncertain to small economic value? Thank you very much.

DR. BROOKE: Good afternoon. My name is Sandra Brooke, and I'm a faculty member at the Florida State University Coastal and Marine Lab, and I've been a deep-sea ecologist for over twenty years now, and I have worked on the *Oculina* Banks, and so it doesn't take many guesses to know that I am going to make comments on Coral Amendment 10.

I am just going to really reiterate what Mike has said, and this area is under one of the planet's strongest currents. They're strong, and they're unpredictable, and they can change direction at-depth, and so the idea that anybody that throws anything over the side in this area has a high level of certainty of where it's going to land and how it's going to behave seems a little suspicious to me. I throw things over the side there, and they have gone in all sorts of different directions, and so knowing where the trawl gear is and how it's going to behave, even in the hands of a fisherman that knows what they're doing -- Accidents can happen, I think.

This is why we put buffers around marine protected areas, is because we understand that, with the best will in the world, accidents can happen, and the *Oculina* Banks have been badly damaged, and we all know this, and I think, if they are starting to recover, which they probably will on those marginal edges, then we need to give them the best chance that they have.

Given that, as Mike alluded, we really don't know what's growing down there on those low-relief areas, and there's been documentation of corals growing on these low-relief ledges, and, even though the pinnacles are the areas that have those big, charismatic sort of high-relief

colonies, those marginal areas can be important. We don't have the multibeam, and we don't have the surveys to know what's there.

The sediment plume issue is a real one. Again, there is very little data on sediment plume intrusion, and corals are very sensitive to that, and, again, this is why we need buffer areas around, especially in trawl fisheries. This area represents, according to the document, less than 2 percent of the fishing data from the VMS points, and so that's a very small benefit, economic benefit, for a relatively high potential impact.

Finally, one of the tenets of the Magnuson-Stevens Act is the precautionary principle, and so I feel that that needs to be applied in this case, and we should stick with the boundaries that were established scientifically back when the HAPC was extended. Thank you.

MS. CLARKE: Good evening. My name is Lora Clarke with the Pew Charitable Trusts. Thank you for the opportunity to provide comments today. We have always been pleased with the precautionary approach that the South Atlantic Council has taken to protect the region's unique deep-sea corals. By establishing the Oculina Habitat Area of Particular Concern in 1984, you became a world leader in habitat protections, and you took the necessary steps to protect this area of global significance.

In 2014, the council established the northern extension of the Oculina HAPC and protected newly-discovered coral mounds. These corals provide important habitat for council-managed species, such as gag grouper, warsaw grouper, speckled hind, black sea bass, and scamp. Now these fragile habitats that take decades to recover are at risk again under Coral Amendment 10. Reopening the portion of the Oculina HAPC under consideration puts these corals at risk from damage by bottom gear and sediment that is stirred up through interaction with the bottom.

We request that you follow the recommendations of your Coral Advisory Panel to keep the Oculina HAPC closed to shrimping and all bottom-fishing gear. Recent mapping work indicates the presence of low relief, which could include hardbottom communities that are providing essential fish habitat. The Coral AP recommended a protective buffer be kept in place to protect both the coral pinnacles and the low-relief hardbottom.

As you consider changes that would cause permanent destruction of fragile and valuable habitat, please consider that 2017 was a record year for the rock shrimp industry, and this was after the closure, and, around the world, closures have been shown to have positive effects. The long-term economic success for the full range of the council-managed fisheries, not just this one, is best served by maintaining these protections. Please give these unique corals a chance to recover. Thank you for the opportunity to provide comments, and, like others have said, I hope to be able to see you all in person soon in Charleston. Thank you.

MS. HAWES: Hi, everyone. I'm the Land, Water, and Wildlife Project Manager at the Coastal Conservation League based in Charleston, South Carolina. As others have stated, I appreciate all of the time and effort the council puts into the issues and discussions. Council meetings are a marathon, but I appreciate the attention you all give for each issue, and I'm looking forward to seeing you all in Charleston at the next meeting.

I am here today to echo others' sentiments on Coral Amendment 10. I support the Coral AP's recommendation to keep all parts of the Oculina HAPC closed. As the Coral AP recommended, we need to maintain the protective buffer to protect both the corals and the low-relief hardbottom. This habitat is crucial to many of the other species that this council manages, and opening any part of this protected area would put these delicate coral ecosystems at risk to both trawling and sedimentation. I will leave it there, to keep it brief, and I appreciate everyone's time on this issue. Thanks.

MR. HORTON: Thank you, Mr. Chairman and members of the council. My name is Chris Horton, and I'm the Senior Director of Fisheries Policy from the Congressional Sportsmen's Foundation. I've got just a couple of brief comments, hopefully brief, and I'm going to start with the reef fisheries, and particularly red snapper.

I mean, it seems obvious that dead discards are really our Achilles heel, and we've got to figure out a way to shift some of those discards into harvest and to access, and I don't know that I have specific answers for you for how to do that, or suggestions, but I would like to encourage the council to keep moving forward on two efforts that I think are going to help find answers in the near future, and the first is the implementation of more focused state data collection programs to supplement MRIP, in order to determine -- To fine-tune a little bit what is actually being caught out there and what's being caught and released and harvested.

I know the council is looking for ways to increase the accuracy of recreational data, but I would strongly encourage any programs developed to be state-based and not federal based. From the get-go, a majority of anglers simply trust their state agencies more than they do the federal government, and they're more likely to give accurate responses and cooperate.

Secondly, I believe the states know their anglers and their behaviors better and can design programs that would be more effective. If developing these state-based programs will require some additional funding, either congressionally or at the state-based level, we at the Congressional Sportsmen's Foundation are certainly ready and willing to help with that.

In addition to the better catch, after listening to the discussion this morning, I mean, I am more encouraged, as Kellie mentioned, with the efforts of the South Atlantic and the Gulf of Mexico Councils in exploring alternative management. I mean, clearly the management paradigm we are currently under doesn't seem very efficient for many species, and so we need a paradigm shift. An MSY proxy of SPR or SSB is based on an assumption that there is a spawning stock-recruit relationship that hasn't really been demonstrated for red snapper in the South Atlantic. It seems clear that there are other variables that are driving this population, fortunately in a positive direction, as we've seen.

Andy and Clay are probably going to roll their eyes, because we've had this discussion before, but don't let this assumed requirement to manage the fisheries based on pounds, or numbers of fish, dictate your discussions or prevent you from thinking outside the box when considering alternative management.

MSA says we need to constrain catch to some limit on an annual basis. That limit does not have to be in pounds or numbers of fish only. National Standard 1, which is NOAA's administrative rule interpreting MSA, is what puts that constraint in place. We probably need to revisit that,

but, regardless, whether it's red snapper or another predominantly recreational fishery, we need to start somewhere in developing a new management model and test that model with a pilot program under an EFP. We need a management approach that not only focuses on the best available science, but, just as importantly, we need an approach that makes the best use of the science we have available.

Again, we stand ready and willing to help with that in any way that we can, and then, finally, regarding the Dolphin Wahoo Amendment 10, we also generally agree and are supportive of the preferred alternatives selected by the council, including the preferred sub-alternative for a vessel limit of forty-eight dolphin under Action 11, and so thanks again for your time and for all that you and the council staff does on behalf of our marine fishery resources.

MR. THOMAS: I'm a commercial fisherman out of Charleston, South Carolina, and I would just like to comment on the MARMAP information, and I happened to -- My nephew worked on one of the research boats, and, when he first told me about the chevron traps, he told me that, when they were dropping the traps off the boat, not only were they not even looking at the bottom machine, but they were basically just going off the one coordinate, and so they would drop them, and they would go in the desert, and they wouldn't catch anything, and they would pull it up and mark that down as zero, blank.

Finally, they put GoPro cameras on, and, when they dropped the trap, they figured out that they were like seventy-five yards from the actual rock, and which everybody was amazed that there was actually fish down there, and so that was kind of disturbing to me, and just a couple of other things.

I have had several actual paid fisheries scientists that did not know the difference between a scamp grouper and a gray grouper, and this is disturbing to me. As far as some of the things about the sea bass, the overfishing with sea bass, I mean, that is a water temperature issue. I mean, that's what's happening with the sea bass, and the other thing that's happening with the sea bass is the red snapper are annihilating them.

They're annihilating them in sixty feet, and they're annihilating them in -- They're from thirty-five feet to 335 feet up here in South Carolina, and so you can't get away, and that's -- They're annihilating the sea bass, and they're probably annihilating your scamp. All the scamp raise up in sixty feet of water, and this is a fact. We used to tag them out of bass traps, when we used to trap in sixty feet of water. They live in sixty feet of water. That's where they raise up, and that's where they get eaten by red snapper.

The red snapper are an issue. Every time, in human history, that we have put -- When we've got something out of balance like this, this is what happens, and it's not us overfishing the fish. It's a combination of water temperature and red snapper on the sea bass.

There's a lot of stuff, and this is a fact. The day that they broke out -- My nephew got two bandit reels out of the closet on the Palmetto and put them on the boat, and, to that point, I think they had eighty-eight red snapper on the books. That year, they caught more red snapper than they had on the books the entire time, in one year, and that's a fact. That's on the books, and so, when you come here with chevron traps and saying there's no fish, that's not -- That's incorrect data, and it's scary to me, as a fisherman, that this is where our data is coming from. It's

horrifying, in fact, because that's not what is happening, and you've got people that are taking a check and that's it. They're not concerned with what's really out there, I don't think. I'm sorry, but that's how I feel. Thank you.

MR. HUDSON: I just wanted to talk about the photographs that FISHstory is putting together and some of the work that may be done in the near future, and like they experimented with the king mackerel, and I'm understanding that we're possibly looking at the mahi and the red snappers, to measure them, to give them an idea of age, and, since the pictures I provided go back to the late 1940s, and your start date is 1950, you can at least have a picture of what was going on between March and September on any of those years, any of those decades, pretty much.

The headboats, once they started becoming bigger and more prevalent, in the 1960s and 1970s, of course, they had their cumulative effect, but, since the pictures end in mid-1975, I believe that there is some work that could and should be done before we get to the next red snapper stock assessment, because I honestly believe that there is an awful lot of fish that you're missing, and the cameras and the chevron traps won't catch them, and you've got to be able to understand that the big animals aggregate in a different area when they're doing what they're doing, and it's just the nature of the red snapper, and it would be nice to see those ages measured, once you're starting to get what we call a sow.

I've heard of some of them that were near forty-something years old that still only weighed twenty-something pounds, and I have provided pictures of some that weighed thirty-nine pounds, and so, basically, we need to work with what we've got, and we've got a quarter-century of pictures there that you can get some good ideas of size, and potentially age, up into that size that they become sows, and we never collected the otoliths back then, and it's too bad, but there was a Japanese fellow, right around 1960 or thereabouts, that did a little bit of work, and a lot of interviews, with some of these fishermen. I can call my eighty-seven-year-old uncle and see if he can scrutinize that a little bit more for me, because there was a lot that they learned early on back then. Thank you.

MR. THOMAS: Rusty, this is your cousin David in South Carolina, and how are you doing? Anyway, I just wanted to get back -- There was a couple of things that I didn't get to say, and Rusty is right that those bigger fish are not going to go in a chevron trap. I mean, fish are weird about traps anyway, and the way I look at a gag grouper is I used to drop a camera in shallow water, and the only time I ever saw a grouper on that camera, a gray grouper, was when they were leaving the rock at a rapid rate of speed.

They don't -- Divers tell me that those big grouper are smart, and they can go out in the sand look at them. You know, I mean, the thing is it's just not -- It's not -- A grouper is not going to get in a trap like that, and it's very scary that that's where our information is coming from, and I have to say that again.

When I was talking about that thing on the Palmetto, they have a \$10,000 bottom machine, and my nephew said they never got it on. Now, I don't know how you're supposed to find hardbottom without the bottom machine on, and these are things that I have kept inside for a long time, and I just feel like somebody needs to know what's going on out here, because I feel like I

have an inside line on it, because of that, and, like I said, it's scary. When he told me all that stuff, it was scary.

Traps hitting the middle of the desert, and, like Rusty said, how can you get an accurate assessment off of that? Just like he said, you're missing a lot of fish. I mean, I will give you my book of numbers and give you \$1,000 and challenge you not to catch a red snapper. You won't do it. It's impossible, and so, yes, assessments. I don't know how we're going to do this thing, but we've got to do something with the snapper. I just think they're devastating the sea bass up here. I mean, we used to have bass in sixty feet of water, and they are not there anymore, and, I mean, I think that's, like I said, water temperature and snapper.

Like I said, I think that, if we could somehow use more commercial data that we have, I think it would help, especially the way we fish here on the east coast. Not a Gulf fishing technique used here, and that's not what we need. We have current here, and the Gulf is a toilet bowl. We have current that will rip your pants off.

I mean, you can't fish for snapper -- They face into the tide. That's what all fish do when they're in a tide like that, and you're not going to catch them on a vertical rig, and, again, this is bad science, to me. I'm an idiot, but, to me, that's bad science. It's not smart science. I mean, why don't you use an east-coast technique, and then I'll show you all the snapper you want, but, if you come over here with a Gulf technique and say, well, this is what we're going to use universally, I think that's just -- I just think it's heinous. It's kind of silly, and that's all I have to say about that.

MR. HULL: Thank you, Mr. Chair and council members. Just one statement, to start with. I think, today, one of the most alarming and important things that was said today during the red snapper discussion, to me, was, and I think to the council members, and it sure sounded like it was, was, even when our red snapper fishery is considered rebuilt, we won't have any more of a bigger fishery than we have today.

I mean, that really took my breath away, and it made me wonder what's wrong with this system. What are we doing wrong? Something is wrong, and to say that, with all the information we have on the current status of red snapper, and to say that, when it's rebuilt -- We have more animals now, and we don't know why there's more animals, and we think it's because of environmental conditions, and we think, we think, we think.

Then to say that, and, by the way, when it is rebuilt, when we tell you that it's rebuilt, because there's enough proportion of twenty-year-olds for 30 percent SPR, you're still not going to have any more fish to catch than you have today. Well, by the time that happens, how many recreational anglers are there going to be discarding red snapper? You may not have -- It may be nothing left by then, and so it's very, very disheartening, and very disturbing, and it makes you just want to walk away from it and say, well, why are we doing this? For what end?

For what end, and that was said today by the council members, in much more educated ways than I'm saying it, but, from a fisherman, which is all I am, it's very, very disturbing, and it's why most fishermen have -- They don't participate, and they walk away, because they see that. It does no good, and why bother rebuilding, if you get nothing more out of it? Certainly there is plenty of fish there, but why go through the process of technically saying that now we believe

it's rebuilt, but you're not going to get any more fish, and so that was a very, very important statement, and I think John Carmichael made it, and he showed it on a graph, that you would not get any more ACL.

I will just leave it at that, or maybe one more thing. There's a lot of charter boats at my dock, and they come in regularly with scamp and gag, animals that need to be sampled, and they're not being sampled, and I know you rely on the state, and, most of the times, when I see a state person there, there's nobody -- There's either nobody coming in at that time or the weather is bad. I mean, it could be blowing fifty knots, and the people still show up, and I go, what are you doing here, and they go, well, we have to show up, and so it's not working. The whole thing is just not working, in my opinion. Thank you very much for your efforts though, and I appreciate you.

MR. GRAVITZ: Thank you, Chairman, for giving me a little bit of additional time. I really appreciate it, and I just want to pick up on two points that were made by some other speakers on Coral Amendment 10. One really important thing is, as Sandra Brooke pointed out, the proposed area that you want to open on your maps, your multibeam scanning maps, the area is called low relief, but, in fact, there is no visual survey to show that corals aren't there, and the kind of multibeam sampling that you did doesn't have a high enough resolution to have found corals, if they are down there, and so, in fact, you may be opening this area to rock shrimping, when, in fact, there are live *Oculina* coral down there, and you won't know it until they start trawling them up.

Second, and something I sort of skipped over pretty rapidly, is the economic benefit of opening this area, it would appear on the surface, to be pretty minor. Your recommendation report says that only 1.76 percent, and that's 0.0176 of all VMS fishing for rock shrimp, occurred in those areas you're proposing to open, on average, for a ten-year period between 2003 and 2014. That means that, all other things being equal, the rock shrimp fishermen got less than 2 percent of their catch in this area that you're proposing to open, which seems to me hardly a huge economic impact, or burden, positive or negative, on rock shrimp revenues.

In fact, when I looked under the NMFS landing data, there were so few rock shrimp fishermen, and so little data, that, in fact, it was called private and privileged, or something like that, and so there wasn't even any information for the eastern side of Florida for landings of rock shrimp, and so that tells me there were very few rock shrimp fishermen working, because there is no data there. I would just say, again, this would appear to be a pretty big incursion into a well-protected area for what would, again, appear to be a very limited potential benefit to the rock shrimp fishermen. Thank you very much.

MR. REYNOLDS: Thank you for giving me extra time. With all the new science that's coming out, and, as we evolve to understand better that everything is so interconnected, I just really encourage the council to take so much more into consideration with ecosystem management for the future.

There is so many new studies, and so much more data, coming out from scientists, and we all know the state of our coral reefs. I mean, this is on a worldwide basis now, and ocean acidity is rising, and carbon emissions and carbon sequestering -- This is all a really big deal, and these large pelagics play a really big role in this. I mean, this is scientifically proven now, and understanding how the whole ecosystem works -- I think everyone is getting the drift, but we

have to implement these things, and we have to work harder towards understanding the interactions with every single species and how important their role is, not only in the fishery, but in the whole world and the ecosystem together.

I mean, fisheries are important as like a rainforest. We have to protect these things and keep enough fish in the water to be able to keep a healthy ocean, and so monitoring this kind of stuff is really important, and I wanted to pick up, real quick too, on the grouper thing. What we're seeing, as full-time fishermen -- I've seen the changes, and so there was management measures that implemented a closure during the spawning season, but those big groupers -- Nobody caught those. I mean, they were so intelligent and so strong that they just kind of like maintained themselves, and you wouldn't catch many of them.

I remember the biggest black grouper that I ever saw caught was an eighty-four-pound black, and he had about fifteen hooks in his mouth and a spear tip broken off in his head, but the development of more spearfishing now, especially in the Florida Keys, and we're seeing a lot more large groupers come in, and, I mean, fifty-plus-pound groupers on spearfishing gear, on a regular basis now, and so it's causing a big impact for the overall stock, and those are the large breeders, and I think it needs to be addressed, and thank you very much for giving me some more time. Thank you.

MR. THOMAS: I just wanted to say one other thing there. Back to the red snapper, I will say this. I think that, in some cases, the fact that the snapper are -- I mean, I don't fish any of my stuff that I used to fish inshore, ninety feet and that stuff, and they're protecting a lot of the fish in there. I think, on one hand, it's doing the grouper a lot of good, because they will run you off of spots up here, and you can't fish, and you just have to leave.

I think, in some cases, that's good. It's protecting the other fish, but, at the same time, I think it's hurting some other fish, and this is why I keep going back to the whole red snapper assessment and all this stuff, and I just think that it's -- I mean, listen to the name. It's a snapper. It's the most aggressive fish, probably, in the ocean, and so I just think that we need to rethink our assessment, and just like what Rusty said, and we can't -- I think there's a lot of fish we're missing, and I'm not saying that it's a bad thing that this has happened, and I think it will be good in the future, but I do think that you're really putting some pressure on some other fish by letting these snapper just go rogue up in the inshore. I mean, that's what is happening here, and, again, I just want to reiterate that, and I appreciate the time.

(Whereupon, the public comment session was adjourned.)

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