

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
8/25/2011 13:06:20	Michael Walker Jr	saltwalker74@yahoo.com	<p>Regarding greater amberjack: As a successful charter boat captain, I would suggest that you close the season for one more month (June, July and August) and eliminate 2 day limits. I know that Deep Sea Headquarters, a Headboat operation in Port Aransas, TX, has already been proactive in enforcing this as a company policy. I operate out of SeaRanch Marina on South Padre Island, TX, and I have followed suit. If anyone books a 24 hour or longer trip, I will only allow them 1 fish per person on Amberjack. As for catching them, I don't have any problem finding them in good numbers but I do consider them a resource.</p> <p>The other thing I strongly urge you to consider is taking away the lesser Amberjack limits. This has been badly exploited. I have seen guys come in with stringers of greater amberjack, claiming they are lessers. Sometimes it is a common mistake but it is difficult enough for charter captains to distinguish the 2 fish at times so why not just eliminate lesser and leave it 34 inches, 1 per person, closed June, July and August. My 2 cents.</p> <p>Thanks, Captain Michael Walker, Jr.</p>		

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12/19/2011 8:13:38	Charles Mendola	cmendola@nationsadvance.com	<p>To Whom It May Concern,</p> <p>My name is Charles Mendola. I am an independent commercial fisherman in Key West FL.</p> <p>My FV Alexis M is the only boat in the Florida Keys that targets Amberjack commercially in the Gulf of Mexico. We run over 100 miles each trip usually in the worst cold fronts of the year (January and February). We employ 2 full time mates year round. We supply Key West Smoked Fish who supplies Albertsons and other large supermarkets. We also sell a large amount to a fish house in Miami that supplies a lot of Miami's' restaurants, Costco, state prisons etc.. Needless to say our efforts employ dozens of people. Our annual catch in the Gulf of Mexico is about 50,000-70,000lbs.</p> <p>Now unlike other commercial fisherman that are selling their Amberjack for \$0.50-\$0.90 per pound. We do not ever settle for less than \$1.25-\$1.50 per lb. Another wards, we do not just harvest Amberjack to breakeven and kill them for nothing. Our effort put money back into the community and provides jobs.</p> <p>I do understand that measures must be taken to sustain every fishery However; I cannot stand by and watch in proper management of the fishery put myself my employees and others out of a job.</p> <p>A few things that I feel are not fair and do not make scientific sense have to do with the recreational sectors rules. First, if the scientific data shows that female Amberjack are not mature until 35". Why can recreational fisherman kill them at 30"? I see the preferred option is to leave that the same. I say 36" is a no brainer. Especially that recreational catches which let's be honest there's no true way to know how many pounds per year are being caught, are being caught at 3 times the annual rate of commercial fisherman (73% to 27%). Also why can recreational fisherman target Amberjack when they are spawning? I noticed that the preferred option on that is to remain the same.</p> <p>So the recreational sector that does not report their catches with log books, so there is no true way to monitor their catches. They get to harvest amberjack before they mature at 30". They also harvest them at three times the rate of the commercial sector. Oh wait, they also harvest them when they are spawning and commercial sector is not allowed. How is this fair or scientifically sound again?</p> <p>Now the commercial sector like myself who needs to catch these fish to survive.... A preferred trip limit that would not even pay my fuel and crew. Preferred option to keep the closed season when the amberjack are spawning. No talk about reducing the size limit on Amberjack.</p> <p>So let's talk solutions. My brother is a charter boat captain in Key West. My family also does recreational fishing in the Keys. I would never suggest something that would affect recreational or charter fishing in the Keys in a bad way. The fact of the matter is no recreational or charter captain can say the need to harvest Amberjack between 30"-36" to survive or to harvest the when they are spawning. I believe the commercial sector is being given less than an adequate amount of the quota (which I realize probably won't change with anything I say). However: everything else should be fair</p>	Key West, FL, 33040	Commercial Fisher

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12/19/2011 8:13:38	Charles Mendola	cmendola@nationsadvance.com	<p>probably won't change with anything I say); however, everything else should be fair, make economic sense and be scientifically sound. If the size limit is 36" commercial, it should be the same recreational. Whenever the fishery is closed for one sector it should be closed for the other. Also maybe splitting the quota into regions like Kingfish may help us in the commercial sector. The trip limit of 2,000 lbs. will put me out of business, so I cannot agree with any trip limit. Unless, our boat could somehow stay grandfathered in based on our catches from previous years.</p> <p>Another thing is the data that is showing the stock so low is definitely not accurate as far as I am concerned. We had the best year ever in 2011 and the average size fish was well above any previous years. Just look at my log books.</p> <p>I have never commented on anything in the past because I felt my voice was too small. Prove to myself and other commercial fisherman that I am wrong and our input does mean something. My boat catches over 10% of the total quota in the Gulf of Mexico. Take it from someone that is out there that knows the fishery. That wants to see the fish flourish and multiply. That wants to continue to do what he loves and not get put out of business like so many others with one swift brush of the pen.</p> <p>Please if there is anything else I can say or do please do not hesitate to email me with any questions. Thank you for your time and consideration.</p>	Key West, FL, 33040	Commercial Fisher
12/19/2011 12:15:19	Jeff Carter	jefferycarter@gmail.com	<p>Why not grant them gamefish status. If the commercial sector is allowed to keep 503,000 pounds of fish, even at \$10.00 a pound that's a gross of only 5million dollars to the entire industry. If there were only 1,000 recreational fishermen they would only have to spend \$5,000.00 apiece to equal that same gross economic figure. Except that the \$5000 recreational dollars would go to support local municipalities, retail, real estate, and a million other industries. Whereas it has been proven that there are limited economic trickle down effects from commercial fishing. And most recreational fishermen will agree that they spend well in excess of \$5,000/year.</p>	Mobile	Private Recreational Angler

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12/20/2011 15:41:25	Mark Nicholas	turtleskaters@aol.com	<p>Don't even know where to begin. I find your logic flawed at almost every step on just about every species, but I will try to list a couple of things you guys need to rethink.</p> <p>Uping the rec limit from 30 inches to 35 inches. This is based on some "study", that is not listed, but mentioned as evidence or proof, which states only 50% of the fish at 35 inches are reproductively active. So what study are you guys referring to? I find it aggravating that you guys do this a lot, just say, oh, some study says this. What study? Did this study even occur during spawning season? Did the study, if based on the presence of roe, take into account males from females? NASA put a telescope in orbit with some of it in metric and some of it in old english units, so don't tell me mistakes can't happen.</p> <p>Also, on this matter, since when does size of reproductivity matter. Commercial fisherment can keep 14 inch red snapper while mine has to wait until it reaches 16 inches. I am guessing I am to believe their fish somehow reproduces at an earlier size. Flawed. Pure and simple.</p> <p>AJ's that reach 35 inches of size are not desirable table fair. By then they are invested with parasites. I prefer 30.111111 inch AJ's. Guess I am shafted yet again.</p> <p>The fish in the Gulf belong to the public. If reductions are needed, it needs to come from the sector that is in it for profit, ie commercial fishing. They are making a profit from my (our) resource, so they need to take a hit first.</p> <p>Lastly, you just up'd AJ's from 28 to 30 not too long ago. Most publciations do not even have the current reg of 30 inches on it. If you really feel the need to up it to 35 inches, based on some study, at least wait until measuring sticks available for sale have 30 inches, and not 28, on them.</p> <p>Counsil members, your logic is flawed. And you guys are really sticking it to the American public that like to fish.</p> <p>I know limits work. I use them. But your continued assault on our fishing rights is obtuse.</p> <p>Mark Nicholas</p>	Gulf Breeze, FL 32563	Private Recreational Angler

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12/21/2011 20:59:18	William Van Deman	wvandeman@gmail.com	<p>Regarding new amberjack regulations, these would be the options, that I as both a recreational fisherman would recommend:</p> <p>On the recreational side: Action 2.1, Alternative 3: Modify minimum size limit to 34" fork length No Closed Season! Days Open: 366! Landings 1,044,083 Total Removals 1,540,000 (?)</p> <p>On the commercial side: Table 3.2, Preferred Alternative 3: Set trip limit at 1000 pounds. Maintain March/May spawning closure, season would then remain open for nearly the entire year according to NMFS stats.</p> <p>My rationale:</p> <p>Recreational- If AJ's spawn at 35 inches, raising the size limit above the current 30 inches would greatly, and rapidly, help improve viable spawning stock. As any experienced fishermen will concur, fish size abundance is directly correlated to size limit. Today we find schools of one inch undersize AJs common (or grouper, snapper, ect). The same will be true if the size limit is raised to 34 inches or even 36 inches. By the numbers presented in this alternative, sport fishermen will be able to enjoy bigger fish, and yearround fishing by raising the size limit AND eliminate the closed season. Discards will indeed increase however having participated in AJ research and charter fishing for 20 years I can say for certain that AJs have a very high catch and release survivability. Not sure how it was derived however I would question the total removals estimates listed in this document (50-63% by my math). I would also suggest that the average size will increase to near legal size rapidly (most members of the jack family grow quickly) and discards will be far less than those estimated in the document. Eliminating the closed season will allow the Council to throw a lifeline to the beleaguered recreational and charter fishermen of the Gulf who are often faced with few open season fish to target. The option to harvest a single mature AJ per person (crew excluded) can be the difference between a visitor booking a charter or spending his money elsewhere. Closures hurt the worst. If having a yearround is an option with an increase in size limit I say increase it to where ever necessary. The average fish size will increase faster than most realize.</p> <p>Commercial From what I understand the commercial situation is this. Low prices generally keep most fishermen from directly targeting AJs, \$1.25- \$1.50 is about the average. In the past however there were a select few boats that will run SW to very deep water on directed jack trips and hammer the giant AJs. Its is not unheard of for them to bring in 10,000 pounds of adult AJs in a trip. When this fish hits the limited AJ market the price drops in half, at best. Or everyones season closes early. The bottom line for most other fishermen is therefore a closed season or a lousy price. By implementing a trip limit of 1000 pounds, directed commercial amberjack fishing in the Gulf will essentially be eliminated. According to the stats here, without trip limits the entire Gulf commercial TAC could be caught in 41 trips of a single boat. With tight trip limits, the preferred 409,000 pound TAC will then be spread out for the use of all the fishermen, which will stabilize the market price, produce better quality fish, and probably not even reach the allowable catch target. If the season needs to be closed for 2 months it makes sense</p>	33572	Private Recreational Angler

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12/21/2011 20:59:18	William Van Deman	wvandeman@gmail.com	<p>allowable catch target. If the season needs to be closed for 2 months it makes sense to do it when the fish are spawning.</p> <p>I would also strongly note that the dead discard and mortality rate used for this species is grossly exaggerated and erroneous. My experience as a diver and fisherman would be more in the range of 10% mortality for discarded fish.</p>	33572	Private Recreational Angler
12/22/2011 22:31:00	William Curry	bcatfish227@charter.net	<p>Your stock assesments always seem to counter what I see in the gulf. Red snapper and Amberjack are overly abundant in the northern gulf.. For instance, I kingfished this year and many times caught red snapper and amberjack on a troll. I fish in federal waters for large coastal sharks and on a 50 hook set I come up with 36 red snapper 10 to 20lbs. Thats rediculous. Also I have a gulf reef permit and I don't have any allocation so when red snapper gets a bump I never see any. I feel that anyone who owns a gulf reef permit should get some sort of allocation when the quota is raised. I have to lease it for 3.00 and then pay 3% and pay for my vms. No profit there please reconsider trip limits on amberjack.</p>	Slidell LA 70461	Commercial Fisher
12/22/2011 23:56:57	Thomas Davis	tmdavis93	<p>I would like to see the size limit moved up to 34" and the season closed to every one during peak sawing times.</p>	North Port Flويدا	Private Recreational Angler
12/25/2011 9:57:50	Chris Jaffe	papawoodchris@g.mail.com	<p>How do you get an accurate fish count off of recreational fisherman when they do not provide any trip tickets like us commercial fisherman? Commercial trip tickets is the only accurate count you have on any landings. And how is the recreational quota more than commercial on amberjacks? NMFS's bad science is an embaresment and you should be ashamed of yourselves. All you guys are doing is trying to stop hard working american citizens from earning an honest living doing what they love. Amberjacks are not overfished and we are catching bigger fish than ever. You need to get your facts right before you start stealing from us. The ocean is not owned by anyone and you have no right to "police it". Recreational fisherman do more damage on any fishery than commercial fisherman. We can manage our own areas because we want to fish them year after year. Recreational anglers, most of them, don't have a clue what they are doing especially when it comes to releasing fish. "Sport Dicks" as we call them catch and release amberjacks for the fun and they hardly keep any because they are not that good eating as other reef and wreckfish. The Magnusson Stevens act is a violation to our constitution and should be stopped. I am all for a managed fishery but it gets to a point when you start stealing from our children. Commercial fishing is on a downfall already so give us a fucking break. Get your facts right and get them from the people who do the research everyday of our lives. The Commercial Fisherman, not some book worm out of college using boat registration facts calculated with fuel and tackle costs. FYI super inaccurate. Pull it together people we can make it work together.</p>	33040	Commercial Fisher

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12/25/2011 9:57:55	Chris Jaffe	papawoodchris@g.mail.com	How do you get an accurate fish count off of recreational fisherman when they do not provide any trip tickets like us commercial fisherman? Commercial trip tickets is the only accurate count you have on any landings. And how is the recreational quota more than commercial on amberjacks? NMFS's bad science is an embaresment and you should be ashamed of yourselves. All you guys are doing is trying to stop hard working american citizens from earning an honest living doing what they love. Amberjacks are not overfished and we are catching bigger fish than ever. You need to get your facts right before you start stealing from us. The ocean is not owned by anyone and you have no right to "police it". Recreational fisherman do more damage on any fishery than commercial fisherman. We can manage our own areas because we want to fish them year after year. Recreational anglers, most of them, don't have a clue what they are doing especially when it comes to releasing fish. "Sport Dicks" as we call them catch and release amberjacks for the fun and they hardly keep any because they are not that good eating as other reef and wreckfish. The Magnusson Stevens act is a violation to our constitution and should be stopped. I am all for a managed fishery but it gets to a point when you start stealing from our children. Commercial fishing is on a downfall already so give us a fucking break. Get your facts right and get them from the people who do the research everyday of our lives. The Commercial Fisherman, not some book worm out of college using boat registration facts calculated with fuel and tackle costs. FYI super inaccurate. Pull it together people we can make it work together.	33040	Commercial Fisher
12/25/2011 9:58:01	Chris Jaffe	papawoodchris@g.mail.com	How do you get an accurate fish count off of recreational fisherman when they do not provide any trip tickets like us commercial fisherman? Commercial trip tickets is the only accurate count you have on any landings. And how is the recreational quota more than commercial on amberjacks? NMFS's bad science is an embaresment and you should be ashamed of yourselves. All you guys are doing is trying to stop hard working american citizens from earning an honest living doing what they love. Amberjacks are not overfished and we are catching bigger fish than ever. You need to get your facts right before you start stealing from us. The ocean is not owned by anyone and you have no right to "police it". Recreational fisherman do more damage on any fishery than commercial fisherman. We can manage our own areas because we want to fish them year after year. Recreational anglers, most of them, don't have a clue what they are doing especially when it comes to releasing fish. "Sport Dicks" as we call them catch and release amberjacks for the fun and they hardly keep any because they are not that good eating as other reef and wreckfish. The Magnusson Stevens act is a violation to our constitution and should be stopped. I am all for a managed fishery but it gets to a point when you start stealing from our children. Commercial fishing is on a downfall already so give us a fucking break. Get your facts right and get them from the people who do the research everyday of our lives. The Commercial Fisherman, not some book worm out of college using boat registration facts calculated with fuel and tackle costs. FYI super inaccurate. Pull it together people we can make it work together.	33040	Commercial Fisher

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12/25/2011 9:58:09	Chris Jaffe	papawoodchris@g.mail.com	How do you get an accurate fish count off of recreational fisherman when they do not provide any trip tickets like us commercial fisherman? Commercial trip tickets is the only accurate count you have on any landings. And how is the recreational quota more than commercial on amberjacks? NMFS's bad science is an embaesment and you should be ashamed of yourselves. All you guys are doing is trying to stop hard working american citizens from earning an honest living doing what they love. Amberjacks are not overfished and we are catching bigger fish than ever. You need to get your facts right before you start stealing from us. The ocean is not owned by anyone and you have no right to "police it". Recreational fisherman do more damage on any fishery than commercial fisherman. We can manage our own areas because we want to fish them year after year. Recreational anglers, most of them, don't have a clue what they are doing especially when it comes to releasing fish. "Sport Dicks" as we call them catch and release amberjacks for the fun and they hardly keep any because they are not that good eating as other reef and wreckfish. The Magnusson Stevens act is a violation to our constitution and should be stopped. I am all for a managed fishery but it gets to a point when you start stealing from our children. Commercial fishing is on a downfall already so give us a fucking break. Get your facts right and get them from the people who do the research everyday of our lives. The Commercial Fisherman, not some book worm out of college using boat registration facts calculated with fuel and tackle costs. FYI super inaccurate. Pull it together people we can make it work together.	33040	Commercial Fisher
12/27/2011 18:38:42	Brent Kempton	Hoogboats@aol.com	Need to do REAL research on these fish, actually go out and study them in the ocean. And not on a piece of paper. Myself and many others do not see these lower numbers and low quantities of this species that are being addressed to the public. Show us REAL proof of these populations.  Brent Kempton	saint petersburg,fl. 33712	Private Recreational Angler, Commercial Fisher
1/4/2012 2:46:53	Richard R. Csuhta	rcsuhta@gmail.com	I support Alternative (3) Option (b). Please consider my preference when submitting the legislation changes.  Sincerely, Richard R. Csuhta CDR/USN (Ret)	Wimauma, FL 33598	Private Recreational Angler
1/7/2012 12:33:31	John L Scholtens Jr	jlscholtens@hotmail.com	Please remember the financial impact offshore fishing has on our economy and the reduction of allowable catch and smaller limits is discouraging many of us almost to the point of giving up the sport we grew up with. I really hope and pray that this is not what you are really trying to accomplish.	Slidell, Louisiana, 70458	Private Recreational Angler
1/13/2012 8:37:32	Peter Stepanek	petestepanek@hotmail.com	Regarding the recreational management measures I favor Action 2.1 Alternative 4 - 36" limit i.e. raising the size limit above the normal reproductive lower level and 2.2 Alt 1 (no closed season). Amberjack caught with circle hook seem to release well (no swim bladder). Keeping fish who have yet to spawn makes no sense to me. Smaller fish taste better and have less mercury, but we need to rebuild. Regarding the comercial management measures. I favor Preferred Alternative 2: Establish a commercial greater amberjack trip limit and maintain March 1-May 31 closed season. Option d: Establish a 500 pound whole weight trip limit for greater amberjack. The sooner we rebuild, the better for all.	77025	Private Recreational Angler

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1/13/2012 17:19:39	Andre L. Thomas	thomasblackbear@bellsouth.net	I would like to see the amberjack season be closed during the spawning season, spring. Not in the middle of the summer to accommodate the charter boats in Florida. This along with a 34" minimum size limit should help to restore the stock. This should help avoid a collapse of the fishery like the one that was experienced on the east coast in the striper fishery. We have to learn from our prior mistakes. It would be better to have two seasons with low catch totals at the dock, than to have the fishery shut down for ten years.	Hammond, LA 70403	Private Recreational Angler

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1/14/2012 6:24:07	Trip Aukeman	taukeman@ccaflorida.org	<p>Coastal Conservation Association Comments on the Gulf of Mexico Fishery Management Council's Reef Fish Amendment 35 for Greater Amberjack</p> <p>It bears repeating here that in 2007 The Gulf of Mexico Fishery Management Council found that Gulf greater amberjack were overfished and that the catch levels must be reduced to generate a recovery. The significant factors that led to overfishing were the lack of a commercial quota and any effort to hold that sector within its allocated share. Commercial landings rose to 32 percent of the total catch, double the allocation it was assigned in 1990. Far from being penalized for that overage, this Council instead rewarded the commercial sector by abruptly increasing its allocation to from 16% to 29%, where it stands today.</p> <p>As such, this is yet another occasion to stress to the Council the importance of examining the allocations for fisheries based on modern criteria, including social, economic and conservation criteria. The regulations before you today aim to limit harvest for both the recreational and commercial sectors to end overfishing. Would such limitations be necessary for recreational anglers if the allocation had not been arbitrarily adjusted to shift quota to the commercial sector a few years ago? Are we shortchanging the most economically vibrant sector of this fishery unnecessarily?</p> <p>Ending overfishing is a worthy goal, but we question whether or not the determination of overfishing for the recreational sector in this fishery is a product of dubious past management decisions regarding allocation. Without knowing that information, CCA finds it impossible to support any of the options before this Council with regard to closures or other adjustments to amberjack management.</p> <p>Additionally, the Annual Catch Target is a management tool that we have never seen used before and we have concerns about how it will be employed. Annual Catch Limits are intended to set a biologically allowed catch and we accept that the Target is intended to set a buffer so that the season does not close unexpectedly. However, we are concerned that NOAA Fisheries will react heavy-handedly if the Annual Catch Target is reached and fear that the agency would close the fishery completely for the remainder of the year as a result.</p> <p>It appears that if the preferred alternatives are passed, then we will start out the year with the same minimum size limit, the same projected season, and an Annual Catch Target that is approximately 17% less than the Annual Catch Limit that was exceeded last year. This gives the appearance to us that the management regime is setting everything up to close the fishery less than halfway thru the year. We would find that a completely unacceptable situation and expect that the Council would take steps to ensure that the season remain open as long as possible.</p>	tallahassee, FL 32317	Private Recreational Angler

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1/17/2012 10:09:41	Dan MacMahon	uwheadhunter@verizon.net	<p>I'm happy to see that at last we will be getting a trip limit for Amberjack's. IMO, the best trip limit for these fish would be 1000 Lbs or maybe 1500 Lbs. These smaller trip limits would help ensure a much longer season and raise the price/value of the fish.</p> <p>While I'm glad to see a 2000 LB limit, I'd be thrilled to see a slightly smaller limit.</p> <p>However, good work on setting a trip limit on these fish.</p>	Spring Hill FL 34610	Commercial Fisher
1/18/2012 19:39:38	Ed Makatura	edmakatu@yahoo.com	<p>Why does the council treat the Gulf like one big pond? i.e. fishing pressure on Red snapper here in the Middle grounds area is much less than it is in the panhandle because of the distance that boats have to run to catch them. Seems to me that everyone - fish and fishermen - would benefit if the gulf was divided into sectors based on habitat, species, pressure, economic impact etc. Focusing solely on annual catch seems too narrow.</p> <p>The council is corrupt and I will no longer follow its laws.</p>	st pete, fl, 33708	Private Recreational Angler
1/25/2012 13:38:54	Eric Lyons	ejl5832@hotmail.com	<p>I will make this short and simple. Red snapper, mangro snapper and amberjack are so plentiful in the Gulf of Mexico off of the southern Louisiana coast. All platforms which in turn supplies as an artificial reef for offshore saltwater species, this new "management" is ridiculous.</p>	Houma, LA, 70363	Private Recreational Angler



Mr. Robert Gill, Chairman  
Gulf of Mexico Fishery Management Council  
2205 North Lois Avenue  
Suite 1100  
Tampa, Florida 33607

January 25, 2012

**RE: Public Hearing Draft for Amendment 35 to the Reef Fish FMP (Greater Amberjack Rebuilding Plan)**

**Chairman Gill and members of the Gulf Council:**

On behalf of the Pew Environment Group's Gulf of Mexico Fish Conservation Campaign, we are writing to offer our comments on the Public Hearing Draft for Amendment 35 to the Reef Fish Fishery Management Plan. In general, we support efforts to end overfishing and rebuild greater amberjack through Amendment 35. However, we do have some concerns and recommendations that we urge you to consider prior to final approval so that the amberjack population can be restored to full health and support a sustainable fishery in years to come.

Specifically, we recommend:

- Ensuring the catch levels in the rebuilding plan (Action 1) are sufficient to end overfishing and rebuild the population.
- The use of annual catch targets (ACT) and accountability measures (AMs) as described in Action 1 except that if the catch limit is exceeded the overage should be deducted from both the ACL and the ACT.
- Ensuring that potential effort shift and intensification in both the recreational and commercial fisheries are adequately accounted for in the catch levels and management strategies.
- Reconsideration of recreational minimum size limits (Action 2.1) as a means to rebuild the population per the Scientific and Statistical Committee's (SSC) review and discussion.

Ending Overfishing and Rebuilding the Greater Amberjack Population

The greater amberjack population has been overfished since at least 1998, according to the past three stock assessments. The current rebuilding plan went into effect in 2003 and was expected

to rebuild the greater amberjack population in seven years. However, management action to date has been insufficient to end overfishing or rebuild the population. Though the 2011 update assessment was wrought with scientific uncertainty, it did demonstrate -- and the Council's SSC concluded -- that overfishing is still occurring and the population remains overfished.

The SSC determined that the 2011 update assessment was inadequate to set future catch levels and so used the default level of 75% of recent average landings from Tier 3b of the ABC Control Rule as the recommended allowable biological catch (ABC) level. Given that greater amberjack has been overfished for more than decade and has shown little sign of recovery, and that the average landings used to determine the ABC were from a period of continued overfishing, a more conservative catch level would be appropriate.

The current preferred alternatives would maintain the existing recreational management measures, including the two-month summer closure, which took effect in 2011. Amendment 35 also proposes to set the annual catch limit (ACL) equal to the ABC in Action 1, which is just 5% below the existing catch limit that has been determined to result in overfishing. So, although management measures might achieve the catch target levels selected in the Amendment, they may not be enough to end overfishing and rebuild the fishery.

A more conservative approach would be to revise the catch levels in Action 1 and ensure that all the recreational and commercial management actions in the rebuilding plan focus on maintaining landings at the ACT level. The Council could choose to set ABC and/or ACL at 65% of average landings. With the use of an ACT, the catch level would then be approximately 30% below current allowable catch levels. Both the commercial and recreational amberjack fisheries have gone over their catch limits in the past few years, so managing these sectors with catch targets and buffering for management uncertainty is not only appropriate but consistent with National Standard 1 Guidelines.<sup>1</sup> While we support the use of the ACT as the management target, and accountability measures (AM) in the preferred alternative, the ACT in the preferred alternative is only 18% below the current catch limit. Monitoring in-season catches specifically at the ACT level and adjusting the ACT and ACL for any overages of the ACL are important elements in achieving the rebuilding plan of Action 1. In addition, the Magnuson Stevens Fishery Conservation and Management Act allows the Council to choose catch levels more conservative than recommended by its SSC.<sup>2</sup>

### **Effort Shifting and Intensification**

It is presumed, based on staff analysis of previous fishing seasons, that the recreational two-month summer amberjack closure is sufficient to maintain catch at the ACT level.<sup>3</sup> However, that assumption does not include consideration of effort shifting or intensification of effort for greater amberjack during the open season. It should be anticipated that the shortened red snapper and gag seasons might lead to effort shifting toward other species, including amberjack. Additionally, greater amberjack is typically a secondary target but is often caught on recreational trips targeting

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<sup>1</sup> 50 CFR §600.310(f)(2)(v)

<sup>2</sup> MSA § 302 (h)(6)

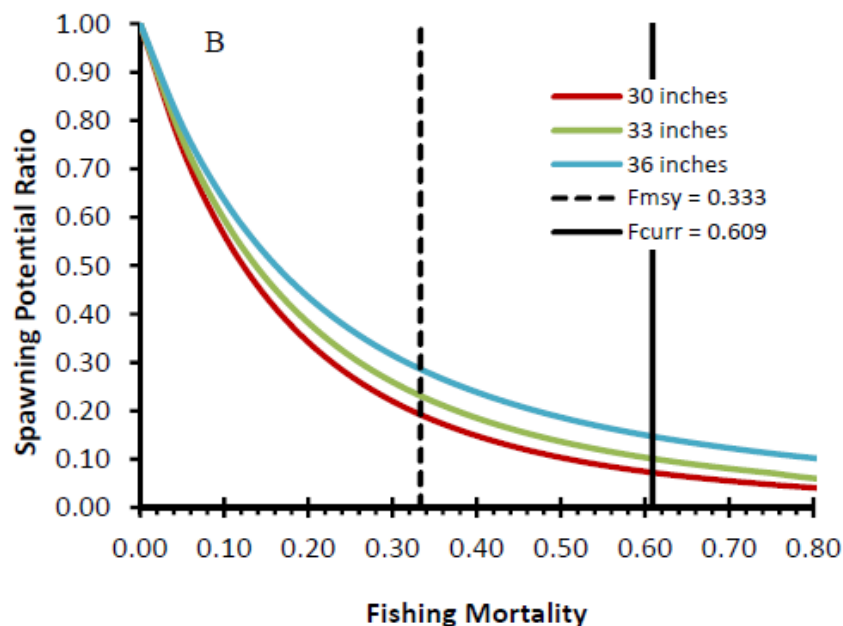
<sup>3</sup> Modeling the Combined Effects of Gulf Reef Fish Amendment 35 Proposed Management Measures for Greater Amberjack. Southeast Regional Office. Agenda item Tab B, No. 12(b), Gulf Council October 2011 briefing book.

other species such as red snapper, gag and red grouper. A higher discard rate and associated mortality should be evaluated and accounted for in the rebuilding plan. For the commercial fishery, effort intensification and discards should also be analyzed when implementing trip limits. **The Council should factor in total mortality for amberjack<sup>4</sup> and consider the variety of species interactions among the fisheries rather than treat each species and fishery in isolation.<sup>5</sup> Thus, the rebuilding plan, catch levels, and management actions should be conservative enough to factor in effort shifting and intensification for both recreational and commercial fisheries.**

**Minimum Size Limits**

Data from the 2011 greater amberjack update assessment indicate that a significant reduction in fishing mortality is needed to rebuild the fishery, though specific levels were not recommended. Currently, the spawning potential ratio (SPR), a benchmark to evaluate population health, hovers around 10%, whereas the management goal for greater amberjack is 30% SPR. Thus, a more conservative approach in the rebuilding plan seems warranted given the population condition and proposed reductions in catch levels. **The Council should revisit the management strategy to ensure it leads to recovery of the amberjack population.**

One specific way identified in the analysis for Amendment 35 to potentially improve the population condition, and SPR in particular, is to increase the recreational minimum size limit under Action 2.1. Staff analysis included in the draft Public Hearing Draft of Amendment 35 demonstrates that an increase in the minimum size limit from 30 inches to 36 inches (fork length) would bring the SPR close to 30% coupled with a significant reduction in fishing mortality.



[Figure 2.24(b) from Amendment 35 (revised 12/23/2011)]

<sup>4</sup> 50 CFR §600.310(f)(2)

<sup>5</sup> MSA § 303(a)(11)

The SSC reviewed analysis for Amendment 35 conducted by National Marine Fisheries Service Southeast Regional Office staff at their January 2012 meeting in Tampa. While there were no specific recommendations offered to the Council on this issue, there was a consensus that the Council should be striving for its 30% SPR biological goal in management action taken. As shown in the figure above from Amendment 35, an increase in size limit improves the SPR level, with a 36-inch limit nearly achieving the 30% SPR goal, depending on the fishing mortality rate.

Amendment 35 also includes NMFS analysis of outcomes on yield-per-recruit (YPR) at different size limits<sup>6</sup>, but the SSC commented that YPR should not be the management goal. In fact, several members were concerned that the current minimum size limit, while achieving a higher YPR relative to an increased size limit, could lead to recruitment overfishing. This is a scenario where the adult spawning population has been exploited to the point that recruitment of juveniles into the fishery is greatly suppressed and the population is not able to replenish itself. This appears to be the case with greater amberjack.

At the current recreational minimum size limit of 30 inches (fork length), less than 5% of females in the greater amberjack population are mature and have had a chance to reproduce at least once. And the bulk of greater amberjack harvested by the recreational fishery in 2009-10 were less than 35 inches, which is the demarcation when 50% of the females are mature (see figure below). As SSC members stated at their January 2012 meeting, the old rule of thumb in fisheries management is to give a fish at least one chance to spawn and so allowing harvest below 35 inches doesn't make sense biologically.

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<sup>6</sup> Figure 2.24(a) draft Public Hearing Draft for Amendment 35, pg 25 (revised 12/23/2011).

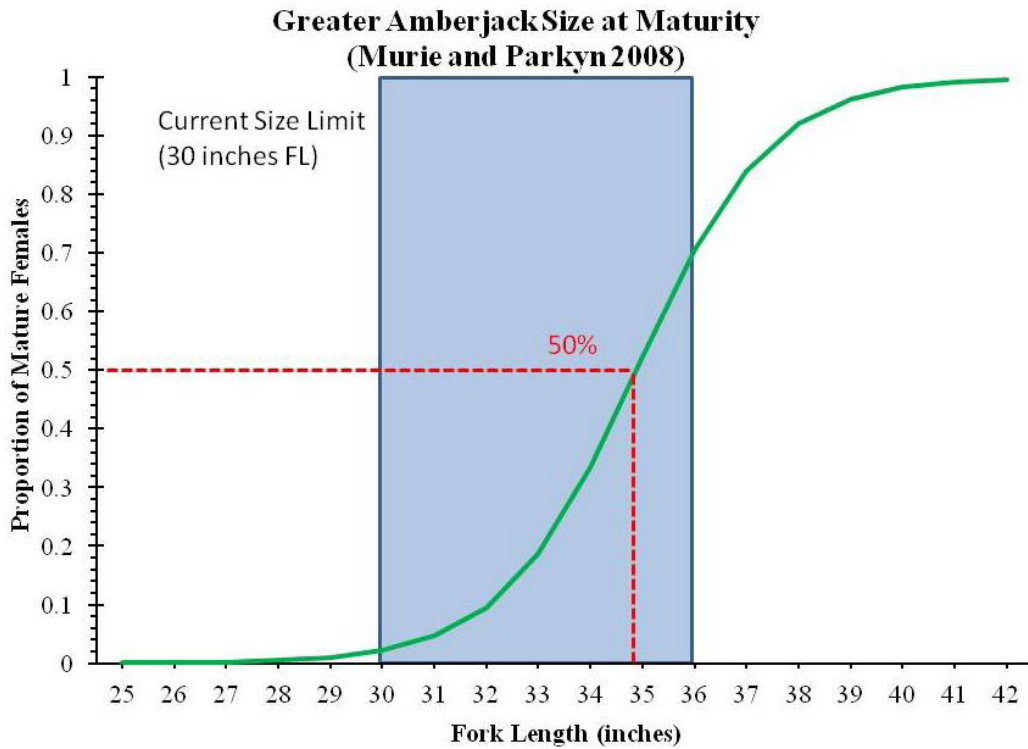


Figure 2.2.1 from Amendment 35 (revised 12/23/2011).

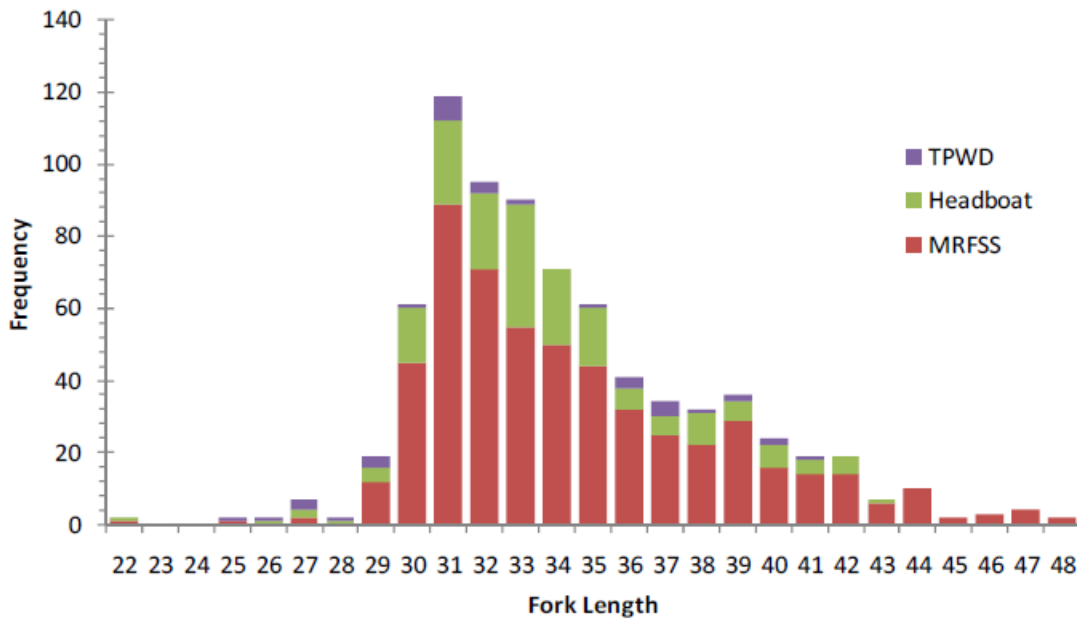


Figure 2.2.3 from Amendment 35 (revised 12/23/2011).

Although discard and associated mortality at increased minimum size limits should be taken into account, impacts on total mortality and overall population health (*i.e.*, SPR) should be considered. Staff analysis indicates that while an increase in the minimum size limit to 36 inches would

increase discard mortality by 25%<sup>7</sup>, total mortality of amberjack would be reduced by approximately 31% (figure below).

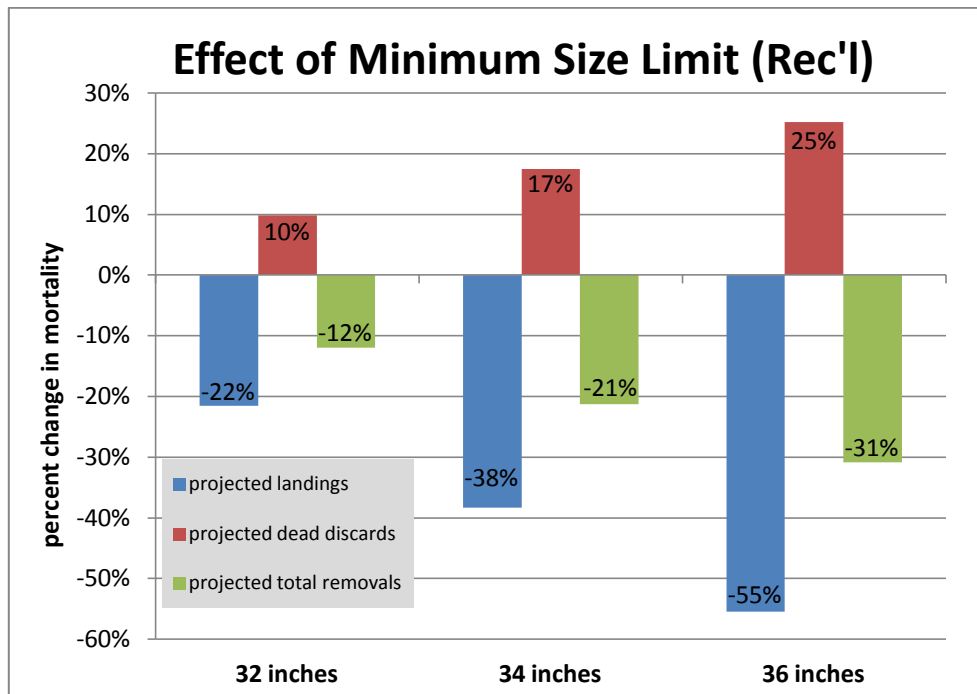


Figure created using the Recreational Decision Tool (Agenda item B7a, August 2011 Gulf Council briefing book)

**Given all the issues surrounding the recreational minimum size limit highlighted above, the Council should revisit Action 2.1.** Clearly, there are significant fishery implications with such a major change from 30 inches to 35 or 36 inches in the recreational minimal size limit. Likewise, there are major biological implications of maintaining the existing 30-inch size limit without further significant reductions in fishing mortality.

### **Precaution after the 2010 Gulf Oil Spill**

With the 2010 Deepwater Horizon oil spill now more than a full year behind us, we are very concerned that any potential impacts to the ecosystem and fisheries resources are not being adequately accounted for in the catch setting and fisheries management process. The spill occurred 48 miles offshore, 1500 meters below the sea surface. 1.8 million gallons of dispersant were applied to the 4.9 million barrels of oil that were released from the well head. While the Deepwater Horizon oil spill was primarily an offshore disaster, much of the oil worked its way inshore causing untold damage to the ecosystem and fisheries resources. Given the magnitude and extent of this event in the productive fishery grounds of the northern Gulf of Mexico, caution should be exercised in setting catch limits and subsequent management action for federally-managed species. This is true for the greater amberjack population whose fishery is concentrated in the northern Gulf and where landings are highest off west Florida and Louisiana<sup>8</sup>, in areas that were oiled.

<sup>7</sup> At the estimated 20% release mortality rate used in SEDAR 9 and the 2011 update assessment.

<sup>8</sup> 2011 Greater Amberjack Update Assessment and NMFS online fisheries data.

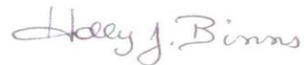
In conclusion, we strongly urge the Council to pursue a management strategy that not only maintains catches at the prescribed ACT levels, but that ensures those levels and subsequent management action are sufficient enough to successfully end overfishing and rebuild the greater amberjack population.

Thank you for the opportunity to provide these recommendations regarding the public hearing draft of Amendment 35. We look forward to continue working with the Council and staff to ensure our fisheries resources are managed sustainably.

Sincerely,



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Gulf of Mexico Fish Conservation Campaign  
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January 27, 2012

Mr. Bob Gill, Chairman  
Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, FL 33607

**RE: Comments on Public Hearing Draft Reef Fish Amendment 35 to the Reef Fish Fishery Management Plan**

Dear Mr. Gill,

On behalf of Ocean Conservancy,<sup>1</sup> we submit the following comments on Public Hearing Draft Amendment 35 to the Reef Fish Fishery Management Plan (FMP) for the Gulf of Mexico region. The Gulf greater amberjack population was first declared overfished in 2000. The 2010 rebuilding target of the rebuilding plan implemented in 2003 has already been exceeded, and based on the best available scientific information it is highly unlikely that the population will be rebuilt by the 2012 rebuilding deadline. While we are concerned about the lack of reliable rebuilding trajectories on which to base management decisions, we support the revision of the greater amberjack annual catch limit (ACL) to correspond with the Scientific and Statistical Committee's (SSC) acceptable biological catch (ABC) recommendation. We further support the application of the annual catch target (ACT) control rule just approved in the Generic ACL Amendment to determine commercial and recreational ACTs for the fishery. We are concerned, however, by the current preferred recreational and commercial management alternatives which, with the exception of a high commercial trip limit, propose to maintain the status quo. This may not be sufficient to keep the fishery within its ACL, reduce fishing mortality, and allow the greater amberjack population to rebuild. This letter provides detailed comments on the considered management alternatives and their prospects for achieving management goals.

**Summary**

Ocean Conservancy supports the following Actions and Alternatives:

- Action 1, Preferred Alternative 3, Preferred option b, to modify the rebuilding plan for greater amberjack using the Gulf Council's Preferred ACL/ACT Control Rule established

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<sup>1</sup> Ocean Conservancy is a non-profit organization committed to protecting ocean environments and conserving the global abundance and diversity of marine life. Through science-based advocacy, research and public education, Ocean Conservancy informs, inspires and empowers people to speak and act for wild, healthy oceans.

in the Generic ACL/Accountability Measures (AM) Amendment, setting the ACL = ABC = 1,780,000 pounds whole weight (ww) and ACT = 1,539,000 pounds ww.

- Action 2.1, Alternative 4, to modify the recreational minimum size limit for greater amberjack to 36” fork length.

In addition, we recommend that the amendment clarify that any ACL overage will be deducted from the following year’s ACL, and the ACT be recalculated according to the control rule based on the new ACL.

### **Applicable Law, Management Background and Need for Action**

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires the National Marine Fisheries Service (NMFS) and the Gulf of Mexico Fishery Management Council (Council) to develop a plan, plan amendment, or regulations to “end” overfishing of a managed species within two years of the notification that the species is overfished.<sup>2</sup> The Act also requires that fishery management plans (FMPs) include ACLs for all species that end overfishing and do not allow it to recur.<sup>3</sup> Greater amberjack was first identified as overfished in 2000. A rebuilding plan was implemented in 2003 with a rebuilding target date of 2010, but no later than 2012.<sup>4</sup> Federal management measures implemented prior to Secretarial Amendment 2 (in 1997 and 1998) failed to keep fishing mortality within allowable limits, and no further action was taken in this amendment to update regulations<sup>5</sup> despite the MSA-mandated duty to end overfishing and rebuild depleted species. *See* 16 U.S.C. §§ 1851(a)(1), 1853, 1854(e).

The 2006 Southeast Data, Assessment, and Review (SEDAR) stock assessment (SEDAR 9) revealed that reductions in fishing mortality were needed immediately.<sup>6</sup> The stock assessment showed that the greater amberjack rebuilding plan had not only failed to achieve rebuilding progress but was, in fact, still allowing overfishing to continue. The Council enacted Amendment 30A in 2008 which modified the greater amberjack rebuilding plan, increased the recreational minimum size limit from 28 inches to 30 inches, and established commercial and recreational ACLs and accountability measures that included an overage payback provision. ACLs were set based on the constant  $F_{OY}$  projection from the assessment for two intervals, 2008-2010 and 2011-2012. Since 2008, the commercial fishery has exceeded its ACL in three out of four years, and the recreational fishery has exceeded its allocation in two out of four years.

An update assessment of SEDAR 9 conducted in 2010 (SEDAR 9 Update) found that the greater amberjack population was still overfished and undergoing overfishing.<sup>7</sup> In 2009, the terminal year of the assessment, fishing mortality rate was almost twice as high as the maximum fishing mortality threshold (MFMT), and the biomass was less than one third of that at maximum

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<sup>2</sup> 16 U.S.C. § 304(e)(3).

<sup>3</sup> *Id.* § 303(a)(15).

<sup>4</sup> Secretarial Amendment 2 to the Reef Fish Fishery Management Plan to set Greater Amberjack Sustainable Fisheries Act Targets and Thresholds and to Set a Rebuilding Plan at 46, November 29, 2002.

<sup>5</sup> *Id.* at 4.

<sup>6</sup> SEDAR 9. 2006 Stock Assessment Report for Gulf of Mexico Greater Amberjack. Assessment Report 2. 178 pp.

<sup>7</sup> SEDAR 9. 2011. Stock Assessment Update Report for Gulf of Mexico Greater Amberjack. 166pp.

sustainable yield (MSY). In addition, fishery-dependent indices of abundance failed to show any signs of population improvement, with the exception of the commercial longline index which showed a slight upward trend since 2007. The SSC accepted the stock assessment for making management decisions, but did not have confidence in the results of the projection model. The committee decided to assign greater amberjack to tier 3b of the ABC control rule developed as part of the Gulf Generic ACL Amendment and set ABC as 75% of the mean of the 2000-2009 greater amberjack landings time series. The Council must now set ACLs based on the SSC's ABC recommendation and ensure that commercial and recreational management measures prevent the sectors from exceeding their ACLs.

### **Action 1: Modifications to the greater amberjack rebuilding plan**

We support preferred alternative 3 with preferred option b in this action. This will set the ACL at the SSC's ABC recommendation level (1.78 mp) and set the ACT based on the ACT control rule specified in the Generic ACL amendment at 1.539 mp. The ACT control rule establishes a 15% buffer for the commercial sector and a 13% buffer for the recreational sector between ACL and ACT. The average recreational quota overage in the last four years is 17% and the average commercial overage is 39%. If we assume that the fisheries and management system will continue to operate as they have been over the last three or four years, these newly established ACTs could be expected to prevent recreational ACL overages but not commercial overages. The ACT control rule is constrained by a maximum ACL-ACT buffer size of 25%, and the commercial greater amberjack fishery may be one example where this constraint is too low. The Council is, however, proposing to implement a commercial trip limit in action 3 and, if low enough, this may help constrain the commercial fishery to its ACL.

Given that there were a number of uncertainties in the SEDAR 9 Update assessment, particularly with the projection model, we encourage the Council to work with NMFS to ensure that reliable greater amberjack catch-at-age data are generated so that the next stock assessment can be performed using statistical catch-at-age models and reliable projection models that give us a better idea of potential rebuilding scenarios.

### **Action 2: Recreational Management Measures**

Under Action 2 of Amendment 35, the Council is considering various management measures applicable to the recreational fishery which would achieve the recreational ACT specified under Action 1 and would allow the population to rebuild. The two actions under consideration are changes to the current recreational minimum size limit and changes to the recreational closed season. In 2011, the Council implemented a recreational closed season from June 1 – July 31, to reduce the rate at which the ACL is met and prevent early closures of the recreational season. In Amendment 35, the Council's preferred options are to take no additional recreational management actions because management support analysis by the NMFS Southeast Regional Office (SERO) indicates that the current June-July closure is sufficient to keep the recreational fishery below the ACL. We are concerned, however, that this may not be sufficient to allow the greater amberjack population to rebuild and urge the Council, for the reasons laid out below, to increase the current recreational minimum size limit.

## A. Management goals cannot be met under the status quo minimum size limit

Management goals for greater amberjack are based on the spawning potential ratio (SPR) benchmark. SPR is an alternative to MSY management often used in the southeastern U.S. when MSY cannot be reliably estimated, as is the case for greater amberjack. SPR is defined as the ratio between the number of spawners (or eggs) produced over a fish's lifetime under a given fishing mortality (F) divided by the number of spawners produced without fishing. It thus measures the proportional reduction in total potential productivity attributable to fishing. The MSY proxy for greater amberjack chosen by the Council is the yield corresponding to  $F_{30\%SPR}$ , in other words, the yield at a fishing mortality rate that reduces the reproductive potential of greater amberjack to 30% of that without fishing. The optimum yield (OY) proxy is  $F_{40\%SPR}$ , as specified in secretarial amendment 2. Under the rebuilding plan established in Secretarial Amendment 2, the greater amberjack population was supposed to be rebuilt to OY levels ( $F_{40\%SPR}$ ) by 2012.

The 2010 SEDAR 9 Update showed an absence of population rebuilding and indicates that the greater amberjack population continues to be overfished, with biomass levels in 2009 at less than a quarter of the rebuilding goal. The SSC provided a new ABC to the Council but was not able to advise the Council when the population might be rebuilt under this new ABC due to uncertainties in the projection model. In the absence of a reliable projection model, we can gain additional insight about the sustainability of the fishery by reviewing new scientific information about the growth and maturation of Gulf greater amberjack in the light of an intuitive management concept that pre-dates fisheries science itself: the need to protect immature fish to achieve sustainability and enhance fisheries yields.

### Best available science on Gulf greater amberjack age at maturity

Previously, it was assumed that Gulf of Mexico greater amberjack reach 50% maturity at three years of age.<sup>8</sup> The best available age and growth information was based on a 1999 study by Thompson et al.,<sup>9</sup> but this study sampled only fish from Louisiana, and this may not be representative of the population at large, especially since the fishery is dominated by landings from Florida. Recent work by Murie and Parkyn provides new information about Gulf greater amberjack age, growth and maturation.<sup>10</sup> The Murie and Parkyn study obtained samples from ongoing sampling programs conducted by the NMFS Panama City laboratory, the Florida Marine Research Institute, and the Gulf States Marine Fisheries Commission and is, therefore, more representative of the Gulf-wide population. This new study found that greater amberjack first mature at 28 inches fork length (FL), reach 50% maturity at 34.7 inches FL or 4 years of age, and are fully mature at 40 inches FL. Recreational catches make up the vast majority of total greater amberjack catches; the interim allocation set in Amendment 30A was 73% recreational and 27% commercial, but due to overage adjustments, the 2011 allocation was 79% recreational and 21% commercial. In 2009-2010, the most frequently landed greater amberjack in the recreational fishery were 31 inches FL. At that size, about 5% of females are sexually mature. At

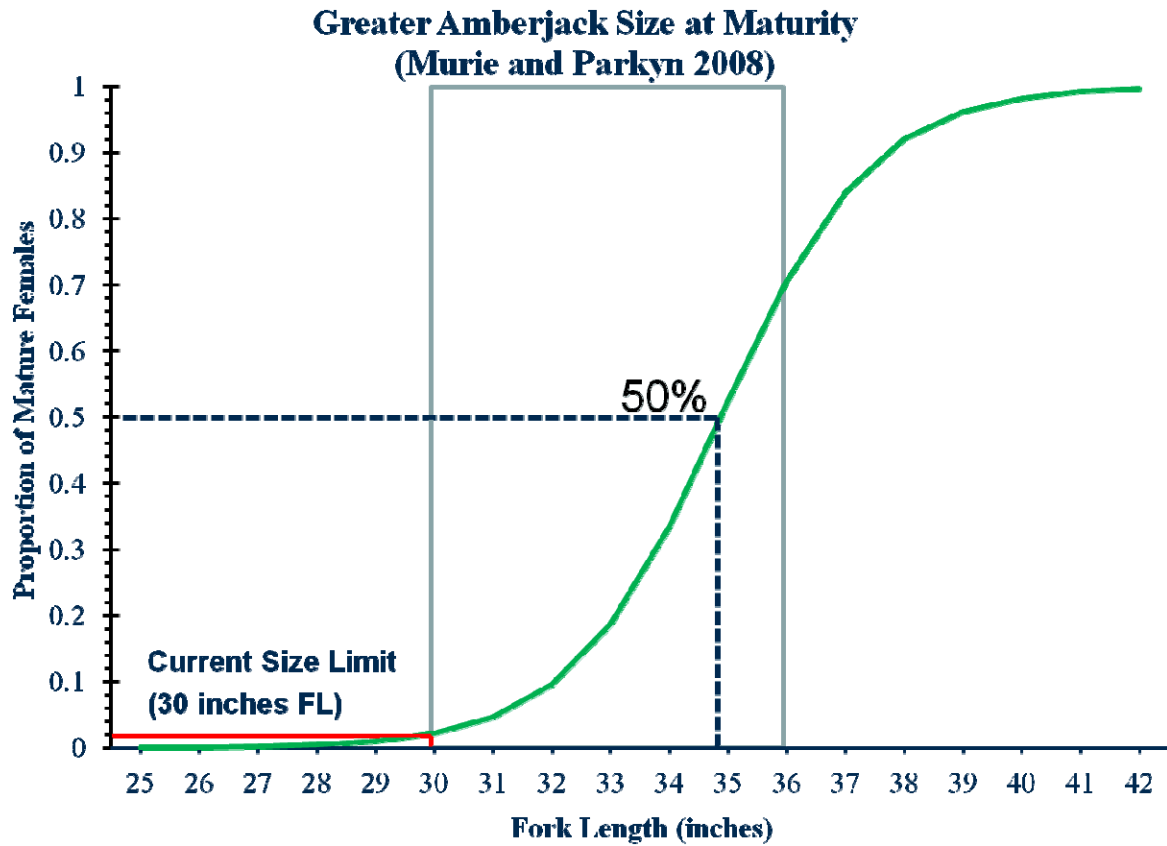
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<sup>8</sup> SEDAR 9. Page 4

<sup>9</sup> Thompson, BA, Beasley, M, and CA Wilson. 1999. Age distribution and growth of greater amberjack, *Seriola dumerili*, from the north-central Gulf of Mexico. *Fishery Bulletin* 97:362-371.

<sup>10</sup> Murie, D.J. and D.C. Parkyn. 2008. Age, growth, and sex maturity of greater amberjack (*Seriola dumerili*) in the Gulf of Mexico. MARFIN Final Report: NA05NMF4331071. 52 pp.

the current recreational minimum size limit of 30 inches FL, only about 2% of the females in the population are sexually mature. This is illustrated in Figure 1 below.



**Figure 1.** Proportion of mature Gulf greater amberjack females by length. The solid line represents the logistic regression model. Source: Mike Larkin’s presentation to the Gulf SSC at the January 2012 SSC meeting; available on the Gulf Council ftp site. (note: an almost identical figure is in Amendment 35, Figure 2.2.1)

Managing exploitation pattern

The main reason for having minimum size limits is to allow females to spawn at least once before they are caught, a concept that is widely recognized as essential to sustainable fisheries management. A recently published study by Vasilakopoulos et al. presents empirical evidence for the “spawn-at-least-once” principle based on 38 fish stocks in the Northeast Atlantic.<sup>11</sup> The authors conclude that “stock status is negatively affected by (i) a high fishing mortality of immature fish compared with the fishing mortality of mature fish, and (ii) a high overall exploitation rate” and that “historical exploitation patterns that result in large proportional fishing mortality of immature fish lead to lower current stock status”. They suggest that managers should pay attention not only to exploitation (fishing intensity) rate but also exploitation pattern (fishing selection).

<sup>11</sup> Vasilakopoulos, P, O’Neill, FG, and CT Marshall. 2011 Misspent youth: does catching immature fish affect fisheries sustainability? ICES Journal of Marine Science 68(7):1525-1534.

While the SERO management decision tool which the Council used to justify its selection of preferred recreational management measures for this amendment suggests that the current preferred alternatives would reduce fishing intensity enough to stay below the ACL, the new Gulf greater amberjack age and maturity information and additional SERO analysis (discussed below) suggest that the current preferred exploitation pattern is not suitable for allowing the population to rebuild and achieve the SPR management goals specified in the FMP. In other words, the fishery catches too many immature fish and combined with the current high fishing mortality rates, this leads to the continued poor condition and absence of signs of population recovery of Gulf greater amberjack.

#### The SERO Yield-per-recruit and SPR analysis

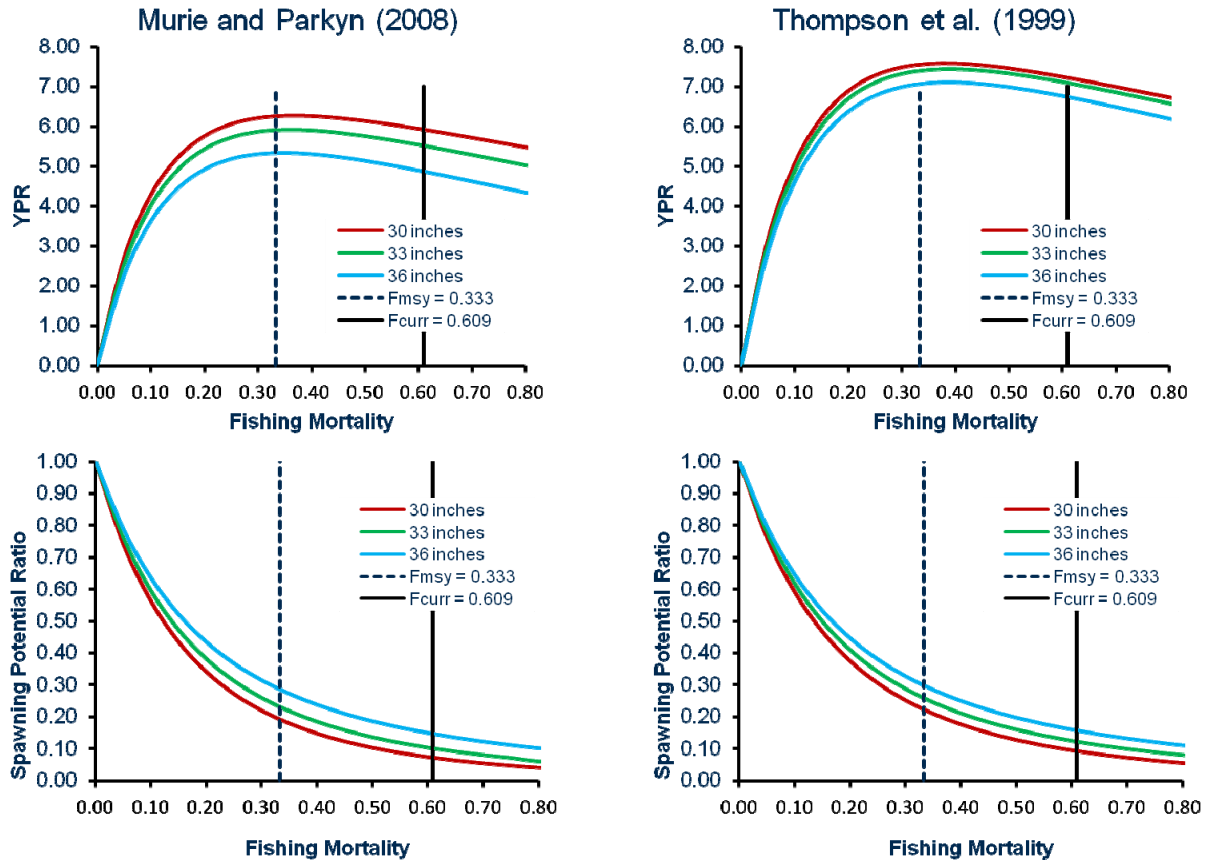
The NMFS Regional Office conducted a yield-per-recruit (YPR) and SPR analysis which was included in the October 2011 Council briefing book (Tab B-12(a)), has been incorporated into the discussion of Action 2.1 in Amendment 35, and was also presented to the Gulf SSC at their October 2011 and January 2012 meetings.<sup>12</sup> The analysis evaluates the greater amberjack YPR and SPR achieved at various minimum size limits and fishing mortality rates, incorporating the new age, growth and maturity information from Murie and Parkyn. The figure below shows the YPR and SPR results (for the model which includes discard and harvest selectivities), for the new (Murie and Parkyn) and old (Thompson et al.) growth curves.<sup>13</sup>

There are several things that can be seen from these figures. First, the new age and growth information indicates both lower SPR and lower YPR at the evaluated minimum size limits than the previous Thompson et al. information. Second, YPR is maximized at lower minimum sizes and SPR is maximized at higher minimum sizes, implying that there is a trade-off between the two strategies and different management strategies are appropriate depending on the management goal. In the case of greater amberjack, as stated previously, the management goal specified in the FMP is an SPR of 0.3 (or 30%) corresponding to MSY and an SPR of 0.4 (or 40%) corresponding to OY. As can be seen from the lower left hand panel in Figure 2 below, the current minimum size limit of 30 inches FL (the level at which about 2% of the females in the population are sexually mature) corresponds to an SPR of roughly 22% when the population is fished at the maximum sustainable fishing mortality rate (which is lower than the current fishing mortality rate). This is well below the MSY-proxy management benchmark limit that the Council and NMFS are responsible for achieving. Conversely, a minimum size of 30 inches FL corresponds to an SPR of about 30%, which does correspond to the MSY benchmark. Under the current fishing mortality rate and current minimum size limit, the population is at less than 10% SPR, which is well below rebuilding and management goals, a result which is mirrored in the poor population status determination results of the recent SEDAR 9 Update assessment. The third thing that can be seen from the Figure below is that there are two things that can be done to increase SPR: 1) change the fishery selectivity pattern by increasing the minimum size limit, and 2) reduce fishing mortality.

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<sup>12</sup> Greater Amberjack Yield-per-recruit and spawning potential analysis for the Gulf of Mexico. NOAA Fisheries Service Southeast Regional Office. September 30, 2011. October Gulf Council Meeting Tab B, No. 12(a).

<sup>13</sup> Larkin presentation to SSC, January 2012 Gulf SSC meeting.



**Figure 2.** SPR and YPR achieved at different fishing mortality rates and minimum size limits under the Thompson et al. (1999) and Murie and Parkyn (2008) growth models. Based on the FWRI-YPR model which incorporates discard and harvest selectivities. Source: Presentation by Mike Larkin (SERO) to the Gulf SSC at the January 2012 SSC meeting. (note: a similar figure is in Amendment 35, Figure 2.2.4)

### SSC discussion of the SERO YPR and SPR analysis

The SERO analysis was presented to the SSC at its October 2011 meeting, when the SSC did not comment on the content of the presentation because it did not have sufficient time to review and again at the January 2012 meeting. The SSC did not have any technical concerns with the analysis and did discuss the management implications of the results. As far as the YPR vs. SPR trade-off is concerned – aside from the fact that the management goal specified in the FMP for which the Council and NMFS are held accountable is not based on YPR but SPR – the SSC report states the SSC noted that “yield-per-recruit may not be a very pertinent metric in the discussion of a recreational fishery, as other motives (ability to harvest a fish, ability to catch a fish, ability to catch a trophy, the fishing experience itself, etc.) are probably more significant to satisfaction than small changes in yield-per-recruit”.<sup>14</sup> The committee also suggested, as stated in the SSC report, that the analysis could be used “to adjust the size limit to avoid having SPR drop below a predetermined level such as 30% SPR”. The SERO analysis presents strong evidence that a minimum size increase is needed to achieve this target SPR level, and the SSC noted that

<sup>14</sup> Standing and Special Reef Fish SSC Meeting Summary. Tampa, Florida. January 9-11, 2012. Available as Tab B, No. 3(a) in the January 2012 Gulf Council Meeting Briefing Book.

“there is a large increase in SPR with increasing size”. The SSC further noted that “the greatest effect on increasing both yield-per-recruit and SPR comes from reducing the fishing mortality rate”, which is clearly necessary because current fishing mortality rate is above sustainable levels, but as we have seen from scientific analyses like the Vasilakopoulos et al. study discussed above, or a paper by Katsukawa (2005),<sup>15</sup> both exploitation pattern and fishing intensity need to be managed in order to avoid recruitment overfishing and achieve a sustainable fishery.

#### Other effects of increasing the minimum size limit

Of course, the Council must also consider other effects that raising the recreational minimum size limit would have. Increasing the minimum size limit would reduce the rate at which the recreational ACL is met and would increase dead discards. Based on the SERO recreational management measures decision tool, dead discards would increase by about 20% if the size limit was increased to 34 inches FL and by 30% if it was increased to 36 inches FL as compared to the status quo size limit, seasonal closure, and bag limit. These estimates are, however, based on a constant discard mortality assumption of 20%, and as the SEDAR 9 Update assessment report states, there is now evidence that “release mortality for Gulf of Mexico greater amberjack may be substantially lower than previously estimated”,<sup>16</sup> and this will, doubtlessly, be addressed in the next benchmark assessment. What this means for management is that increasing the minimum size limit might not result in large increases in dead discards. Instead, the effects would be a reduction in fishing mortality, an increase in the spawning potential of the population by preventing the killing of too many immature fish, and a longer recreational fishing season.

As we have laid out above, there is substantial empirical and model-based scientific evidence that the current recreational minimum size limit for Gulf greater amberjack is too low to allow the population to rebuild and achieve management goals. Too many immature fish are being killed before they have a chance to reproduce. Only 2% of the females in the population are mature at the current minimum size limit and only 5% of the females are mature at the size when most of them are landed by the recreational fishery. There is evidence from fishery-independent research that greater amberjack have very low release mortalities<sup>17</sup>, making increases in minimum size limits an attractive and viable management option. Since 50% maturity for Gulf greater amberjack occurs at about 35 inches fork length based on the recent study by Murie and Parkyn, we recommend that the Council change its preferred alternative for action 2.1 to alternative 4: modify the minimum size limit for greater amberjack to 36” fork length.

### **B. Modifications to the recreational closed season may be warranted if the minimum size limit is increased**

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<sup>15</sup> Katsukawa, T. 2005. Evaluation of current and alternative fisheries management scenarios based on spawning-per-recruit (SPR), revenue-per-recruit (RPR), and yield-per-recruit (YPR) diagrams. ICES Journal of Marine Science 62:841-846. – this study shows that spawning-per-recruit can be increased by lowering fishing mortality and maintaining selectivity pattern or increasing the age of recruitment into the fishery while maintaining fishing mortality after recruitment at constant levels

<sup>16</sup> SEDAR 9. 2011. Stock Assessment Update Report for Gulf of Mexico Greater Amberjack. page 23

<sup>17</sup> The estimate of post-release mortality derived from headboat observer data collected by the Florida Fish and Wildlife Conservation Commission was 3.8 percent. An estimate of acute mortality from Murie and Parkyn (2010) was less than 2% based on preliminary data. Source: 2011. Stock Assessment Update Report for Gulf of Mexico Greater Amberjack. page 23.

If the Council increases the minimum size limit for greater amberjack, the rate of recreational landings will be slowed, assuming compliance with the new minimum size limit. The SERO decision tool suggests that the fishery will not land its ACL under a 36" minimum size limit and status quo closed season and bag limit. The Council could consider changing the closed season **IF** it adopted a higher minimum size limit. The current closed season of June 1 through July 31 does not coincide with the greater amberjack peak spawning season which happens in March and April in the Gulf of Mexico.<sup>18</sup> The main purpose of the closed season was to slow the rate of recreational catches and prevent ACL overages and early closures of the fishery. The SERO decision tool indicates that this closure may not be needed if the minimum size limit is increased to 36 inches fork length. Biologically, it would be most beneficial to have a closure in March and April to protect females during the peak spawning season.

### **Action 3: Commercial Management Measures**

In Action 3, the Council is considering changes to the current commercial closed season of March 1 – May 31 and establishing trip limits. The Council's preferred alternative is to not change the closed season and implement a 2,000 lb trip limit. The commercial fishery has exceeded its ACL in the last three consecutive years by 26 to 47 percent. Under the current preferred alternative for action 1, there will be a 15% buffer between the commercial ACT and ACL, which may not be sufficient for preventing ACL overages in the commercial sector. SERO and Council staff analyses suggest that under the current closed season and with a 2,000 lb trip limit, the commercial season would still have to close sometime between September 19<sup>th</sup> and October 2<sup>nd</sup> to prevent ACL overages. Lower trip limits would result in longer commercial seasons and lower probabilities of large ACL overages.

### **Overage Adjustments**

Amendment 30A implemented an overage adjustment for greater amberjack that reduces the quota in the year following the overage if commercial or recreational landings exceeded their quota. Due to terminology changes, it is unclear if "quota" refers to ACL or ACT. The amendment should clarify that the ACL overage will be deducted from the ACL in the year following an overage. Furthermore, the ACT should be recalculated based on this new ACL and any changes to the buffer size that result by applying the ACT control rule. The frequency and, to a smaller degree, the magnitude of ACL overages affect the buffer size as calculated in the control rule, and therefore the buffer size may or may not increase in the year after an overage.

### **Conclusion**

Science indicates that the Gulf of Mexico greater amberjack population has been in an overfished state for over ten years. In the past, the Gulf Council and NMFS often failed to enact management measures when they should have, assuming that status quo management was sufficient to allow the population to recover. We are now upon the end of the 10-year rebuilding

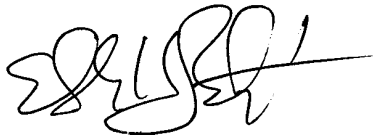
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<sup>18</sup> Murie, D.J. and D.C. Parkyn. 2008. Age, growth, and sex maturity of greater amberjack (*Seriola dumerili*) in the Gulf of Mexico. MARFIN Final Report: NA05NMF4331071. 52 pp.

period, and the population fails to show signs of recovery, indicating that the status quo is not working. In Amendment 35, the Gulf Council reduces the ACL and sets an ACT based on control rules just adopted by the Council and NMFS in the Generic ACL amendment. While we applaud this action, we strongly urge the Council to reconsider its proposed recreational management measures. The largest portion of greater amberjack fishing mortality is attributable to the recreational fishery, and we have laid out several lines of evidence in this letter that suggest that current measures to reduce recreational fishing pressure will not be sufficient to allow the population to rebuild. Achieving rebuilding goals is more important now than given the unknown impacts from the BP oil disaster in 2010 on the greater amberjack population health and recruitment.

As always, we thank the Council for the opportunity to provide comments and look forward to working with the Council and NMFS in the future to ensure healthy and sustainable fisheries in the Gulf of Mexico.

Sincerely,



Elizabeth Fetherston  
Deputy Director, Fish Conservation Program  
Ocean Conservancy  
449 Central Avenue, Suite 200  
St. Petersburg, FL 33701



Claudia Friess  
Fishery Analyst  
Ocean Conservancy  
106 E 6<sup>th</sup> Street, Suite 400  
Austin, TX 78701

Subject: <no subject>

Date: Tuesday, January 31, 2012 8:28 AM

From: chuck weddel <cweddel@hotmail.com>

To: Pamela Dana <fish@surelurecharters.com>, Bob Gill <bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>, <intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>, Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>, <info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>, Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron Fischer <mfischer@wlf.la.gov>, Randall Pausina <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>, John Milner <GulfCouncil@gulfcouncil.org>, Denny Fishing Rights Alliance <fra@tampabay.rr.com>

Dear Sirs:

Gulf Council Amendment 35 - greater amberjack

We are concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

On action 2.1 - Modify the recreational minimum size limit, Alternative three is the most acceptable. Modify the minimum size limit for greater amberjack to 34 inches fork length.

50% of female greater amberjack are reproductively mature at approximately 35 inches fork length. Increasing the minimum size limit for greater amberjack is beneficial to increasing the spawning potential of the stock, according to the Council's scoping document.

Raising the minimum recreational size limit increases angler opportunity, achieves a reduction in harvest and increases the spawning potential of the stock. This should be the preferred option. Positive economic impact, positive biological impact, and achievement of a landings reduction are ALL available with this decision. It is beyond a reasonable person's understanding why this management option is not preferred.

Furthermore, table 2.2.2 is confusing and certainly raises grave concerns over the discard mortality rates used to generate such high total removal numbers at 34 and 36 inch fork length minimums.

The recreational fishing community would like to see an alternative which allows for a concurrent recreational and commercial closure, if in fact that closure is to provide protection to spawning aggregations. Given that a three-month closure would be applied with a 34 inch fork length, we would like to see what a two fish angler bag limit alternative would produce in terms of landings.

Commercial management measures

Simply put, commercial amberjack should be limited to 1000 pounds per trip.

This will reduce over capitalization and provide a more consistent market for the fishermen and a consistently fresh supply for the consumer. It will also have a positive biological impact on the fishery.

To recap:

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Opportunity to fish `creates jobs and maintains communities.

Recreational 34" fork length -

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reduces recreational landings

creates fishing opportunity and JOBS

Why is this not the preferred alternative?

A March through May recreational closure combined with a 34 inch minimum length could even allow for a two amberjack per angler daily limit. This would further increase the opportunity to fish thereby increasing economic activity and creating jobs.

Commercial trip limits should be set at 1000 pounds.

What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Sincerely

Charles (Chuck) Weddel  
5008 W Linebaugh Ave Ste 35  
Tampa, FL 33624  
813-961-2600

Subject: Amendment 35 greater amberjack recreational  
Date: Thursday, January 26, 2012 7:38 PM  
From: Joe Nash <yesterdayscatch@hotmail.com>  
To: John Milner <GulfCouncil@gulfcouncil.org>  
Conversation: Amendment 35 greater amberjack recreational

Gulf council, My name is Joseph Nash a charter owner/ operator for the past 25 years Orange Beach, Al.. I can assure you there are plenty of amberjacks out there and that I am helping your cuase becuase in 2011 I ran 80% less long trips than previous years and most of my trips(80%) were in june-july and Aug

This is due to many things Oil Spill is one , normal customers are not coming back to fish, regulations are to stict is another factor. my spring business is nothing we were off 55% thru memorial weekend, the few customers I have left wanted to go catch both jacks and snapper so they waited and got screwed out of jacks due to a late ruling on jack closure! Thanks again.

I am sorry that we even adopted a management program your paid positions have went from a scant few in the 80's to more than I can count now. I am displeased with holding back fish, closures of species that do not need closure such as scamp , jacks, red snapper. The great Red grouper mystery, what a mess we have made of mismanagement and putting people such as myself in a bind financially. You(we) are supposed to be able to manage a fishery for the people so lets buck up and let some fish loose and give the people their rewards, if you are going to say my hands are tied, RESIGN!! or stand up and do something about it. I believe I would feel very GUILTY collecting a paycheck knowing I am doing the wrong thing only becuase it is within the law.

Stop messing with amberjacks no size increase no season closure you do not really have a clue whats out there.

Take a long strip of hunting land 200 miles by 50 miles and there is 2 roads one at each end they are only 20 miles long each and the hunters have to walk in. There is alot of unused territory there that never sees a hunter, well this is the gulf of mexico and we have a small area that we the majority use its around the fringes and it is smaller every year due to shorter fishing trips. Get it?

I have run 1, 6hr trip since Oct 2011 I am ready to go fishing and my cusomers want to know what they can catch, when I tell them they do not call back, Thank you I am just so tired of the same old BS do something for the good of the people.

Capt Joe Nash Cool Change Charters Orange Beach, Al 36561 251 979-1812

Capt. Joe Nash Cool Change Charters "Let's Go Fishin!!!"

www.coolchangecharter.com <<http://www.coolchangecharter.com/>>  
(251)974-5615

Subject: Gulf Council Amendment 35 - greater amberjack  
Date: Tuesday, January 31, 2012 10:00 AM  
From: John Little <[JLittle@nationalrealty.com](mailto:JLittle@nationalrealty.com)>  
To: Pamela Dana <[fish@surelurecharters.com](mailto:fish@surelurecharters.com)>, Bob Gill  
<[bgillbgill@embarqmail.com](mailto:bgillbgill@embarqmail.com)>, <[lable@fsu.edu](mailto:lable@fsu.edu)>, <[jaguar1@usouthal.edu](mailto:jaguar1@usouthal.edu)>,  
<[intimidatorcarters@yahoo.com](mailto:intimidatorcarters@yahoo.com)>, Kay Williams <[hkaywilliams@hotmail.com](mailto:hkaywilliams@hotmail.com)>,  
Tom McIlwain <[tom.mcilwain@usm.edu](mailto:tom.mcilwain@usm.edu)>, Harlon Pearce <[nolrah@aol.com](mailto:nolrah@aol.com)>,  
<[info@superstrikecharters.com](mailto:info@superstrikecharters.com)>, Douglass Boyd <[douglassboyd@yahoo.com](mailto:douglassboyd@yahoo.com)>,  
Patrick Riley <[p.f.riley@comcast.net](mailto:p.f.riley@comcast.net)>, <[nick.wiley@myfwc.com](mailto:nick.wiley@myfwc.com)>, Kevin Anson  
<[Kevin.Anson@dcnr.alabama.gov](mailto:Kevin.Anson@dcnr.alabama.gov)>, <[corky.perret@dmr.state.ms.us](mailto:corky.perret@dmr.state.ms.us)>, Myron  
Fischer <[mfischer@wlf.la.gov](mailto:mfischer@wlf.la.gov)>, Randall Pausina  
<[rpausina@wlf.louisiana.gov](mailto:rpausina@wlf.louisiana.gov)>, Robin Riechers  
<[robin.riechers@tpwd.state.tx.us](mailto:robin.riechers@tpwd.state.tx.us)>, Roy Crabtree <[roy.crabtree@noaa.gov](mailto:roy.crabtree@noaa.gov)>,  
John Milner <[GulfCouncil@gulfcouncil.org](mailto:GulfCouncil@gulfcouncil.org)>, <[FRA@tampabay.rr.com](mailto:FRA@tampabay.rr.com)>  
Conversation: Gulf Council Amendment 35 - greater amberjack

Dear Council Members,

I am concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

On action 2.1 - Modify the recreational minimum size limit, Alternative three is the most acceptable. Modify the minimum size limit for greater amberjack to 34 inches fork length.

50% of female greater amberjack are reproductively mature at approximately 35 inches fork length. Increasing the minimum size limit for greater amberjack is beneficial to increasing the spawning potential of the stock, according to the Council's scoping document.

Raising the minimum recreational size limit increases angler opportunity, achieves a reduction in harvest and increases the spawning potential of the stock. This should be the preferred option. Positive economic impact, positive biological impact, and achievement of a landings reduction are ALL

available with this decision. It is beyond a reasonable person's understanding why this management option is not preferred.

Furthermore, table 2.2.2 is confusing and certainly raises grave concerns over the discard mortality rates used to generate such high total removal numbers at 34 and 36 inch fork length minimums.

The recreational fishing community would like to see an alternative which allows for a concurrent recreational and commercial closure, if in fact that closure is to provide protection to spawning aggregations. Given that a three-month closure would be applied with a 34 inch fork length, we would like to see what a two fish angler bag limit alternative would produce in terms of landings.

Commercial management measures

Simply put, commercial amberjack should be limited to 1000 pounds per trip.

This will reduce over capitalization and provide a more consistent market for the fishermen and a consistently fresh supply for the consumer. It will also have a positive biological impact on the fishery.

To recap:

Set ABC = ACT. No 18% reduction.

Opportunity to fish `creates jobs and maintains communities.

Recreational 34" fork length -

- < increases spawning potential of the stock
- < reduces recreational landings
- < creates fishing opportunity and JOBS

Why is this not the preferred alternative?

A March through May recreational closure combined with a 34 inch minimum length could even allow for a two amberjack per angler daily limit. This would further increase the opportunity to fish thereby increasing economic activity and creating jobs.

Commercial trip limits should be set at 1000 pounds.

Additionally: NO SECTOR SEPARATION and NO CATCH SHARES.

Respectfully,

John Little

National Realty Consultants  
4543 Post Oak Place  
Suite 232  
Houston, TX 77027  
281-497-2200 Office  
713-627-8454 Fax  
281-686-8900 Cell

Subject: Regulations

Date: Tuesday, January 31, 2012 9:18 AM

From: CLAYTON JAMES <seajames1@msn.com>

To: Pamela Dana <fish@surelurecharters.com>, Bob Gill  
<bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>,  
<intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>,  
Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>,  
<info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>,  
Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson  
<Kevin.Anson@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron  
Fischer <mfischer@wlf.la.gov>, Randall Pausina  
<rpausina@wlf.louisiana.gov>, Robin Riechers  
<robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>,  
John Milner <GulfCouncil@gulfcouncil.org>, <fra@tampabay.rr.com>

Conversation: Regulations

I have fished the Gulf of Mexico for over fifty years now, and I've never caught as many quality Gag's, Red Snappers, and AJ's.

I've worked towards being a charter captain all of my life, and finally made it, spent the time on the water, spent the money, and found out that I can't make it because of the ridiculous regulations that you've put into place.

You have taken the fun out of fishing.

You don't stop shrimping where the discard is ten pounds of juvenile fish, and sea creatures to one pound of shrimp, and shrimp is food for our fish to eat, and grow, and you don't stop lone line, or bandit fishing.

You aren't doing your job!

Capt. H. Clayton James  
Merryweather Charters  
3046 Flat Rock Place  
Land O'Lakes, FL  
34639

Subject: Comments on Gulf Council Amendment 35 - greater amberjack  
Date: Tuesday, January 31, 2012 9:11 AM  
From: Bill Van Deman <wvandeman@gmail.com>  
Conversation: Comments on Gulf Council Amendment 35 - greater amberjack

My name is Bill. I am a Florida resident, voter and taxpayer.

I am concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

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Commercial trip limits should be set at 1000 pounds.

On another note: What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Sincerely,

Bill Van Deman  
Apollo Beach, FL

Subject: <no subject>

Date: Tuesday, January 31, 2012 8:28 AM

From: chuck weddel <cweddel@hotmail.com>

To: Pamela Dana <fish@surelurecharters.com>, Bob Gill <bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>, <intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>, Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>, <info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>, Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson <Kevin.Ansong@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron Fischer <mfischer@wlf.la.gov>, Randall Pausina <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>, John Milner <GulfCouncil@gulfcouncil.org>, Denny Fishing Rights Alliance <fra@tampabay.rr.com>

Dear Sirs:

Gulf Council Amendment 35 - greater amberjack

We are concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

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Commercial management measures

Simply put, commercial amberjack should be limited to 1000 pounds per trip.

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To recap:

Set ABC = ACT. No 18% reduction.  
Opportunity to fish `creates jobs and maintains communities.  
Recreational 34" fork length -  
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What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Sincerely

Charles (Chuck) Weddel  
5008 W Linebaugh Ave Ste 35  
Tampa, FL 33624  
813-961-2600

Subject: Gulf Council Amendment 35 - greater amberjack  
Date: Tuesday, January 31, 2012 7:40 AM  
From: Stephen Moore <steve@keysmobilediving.com>  
To: Pamela Dana <fish@surelurecharters.com>, Bob Gill  
<bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>,  
<intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>,  
Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>,  
<info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>,  
Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson  
<Kevin.Anson@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron  
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John Milner <GulfCouncil@gulfcouncil.org>, <FRA@tampabay.rr.com>  
Conversation: Gulf Council Amendment 35 - greater amberjack

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On another note: What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Stephen (Steve) Moore  
1075 Duval St  
Suite C21 PMB 208  
Key West, FL 33040  
steve@keysmobilediving.com  
www.keysmobilediving.com

Subject: Amberjack comments  
Date: Tuesday, January 31, 2012 3:50 AM  
From: Ed Makatura <edmakatu@yahoo.com>  
Reply-To: "Ed Makatura" <edmakatu@yahoo.com>  
To: Pamela Dana <fish@surelurecharters.com>, Bob Gill  
<bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>,  
<intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>,  
Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>,  
<info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>,  
Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson  
<Kevin.Ansong@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron  
Fischer <mfischer@wlf.la.gov>, Randall Pausina  
<rpausina@wlf.louisiana.gov>, Robin Riechers  
<robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>,  
John Milner <GulfCouncil@gulfcouncil.org>, <FRA@tampabay.rr.com>  
Conversation: Amberjack comments

Hi, I have a few comments...

Instead of treating the Gulf of Mexico like one big pond, why not manage species based on fishing pressure, spawning habitat, natural range etc? For example, on the west coast of Florida boats have to run out 100 miles to catch Amberjack large enough to meet the minimum limit. Thus there is less fishing pressure.

Please stop the unnecessary closures for GAGS, Red Grouper, ARS and Amberjack. You have killed the sport and the economy.

Regards,

Ed Makatura

9702 54th Ave N

St Petersburg, FL 33708

Subject: Gulf Council

Date: Tuesday, January 31, 2012 6:32 AM

From: MIKE WILKES <mikee928@verizon.net>

Reply-To: "MIKE WILKES" <mikee928@verizon.net>

To: Pamela Dana <fish@surelurecharters.com>, Bob Gill

<bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>,

<intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>,

Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>,

<info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>,

Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson

<Kevin.Anson@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron

Fischer <mfischer@wlf.la.gov>, Randall Pausina

<rpausina@wlf.louisiana.gov>, Robin Riechers

<robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>,

John Milner <GulfCouncil@gulfcouncil.org>, <FRA@tampabay.rr.com>

Conversation: Gulf Council

Gulf Council Amendment 35 - greater amberjack

We are concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

On action 2.1 - Modify the recreational minimum size limit, Alternative three is the most acceptable. Modify the minimum size limit for greater amberjack to 34 inches fork length.

50% of female greater amberjack are reproductively mature at approximately 35 inches fork length. Increasing the minimum size limit for greater amberjack is beneficial to increasing the spawning potential of the stock, according to the Council's scoping document.

Raising the minimum recreational size limit increases angler opportunity, achieves a reduction in harvest and increases the spawning potential of the stock. This should be the preferred option. Positive economic impact, positive biological impact, and achievement of a landings reduction are ALL available with this decision. It is beyond a reasonable person's understanding why this management option is not preferred.

Furthermore, table 2.2.2 is confusing and certainly raises grave concerns over the discard mortality rates used to generate such high total removal numbers at 34 and 36 inch fork length minimums.

The recreational fishing community would like to see an alternative which allows for a concurrent recreational and commercial closure, if in fact that closure is to provide protection to spawning aggregations. Given that a three-month closure would be applied with a 34 inch fork length, we would like to see what a two fish angler bag limit alternative would produce in terms of landings.

#### Commercial management measures

Simply put, commercial amberjack should be limited to 1000 pounds per trip. This will reduce over capitalization and provide a more consistent market for the fishermen and a consistently fresh supply for the consumer. It will also have a positive biological impact on the fishery.

To recap:

Set ABC = ACT. No 18% reduction.

Opportunity to fish `creates jobs and maintains communities.

Recreational 34" fork length -

increases spawning potential of the stock

reduces recreational landings

creates fishing opportunity and JOBS

Why is this not the preferred alternative?

A March through May recreational closure combined with a 34 inch minimum length could even allow for a two amberjack per angler daily limit. This would further increase the opportunity to fish thereby increasing economic activity and creating jobs.

Commercial trip limits should be set at 1000 pounds.

On another note: What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Michael A Wilkes  
13909 Sommers ave  
Hudson, FL 34667

Subject: <no subject>

Date: Tuesday, January 31, 2012 1:02 PM

From: Windows Live Hotmail Team <dokmenen@hotmail.com>

Reply-To: <cstmervalidity033@hotmail.com>

To: Pamela Dana <fish@surelurecharters.com>, Bob Gill <bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>, <intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>, Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>, <info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>, Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson <Kevin.Ansong@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron Fischer <mfischer@wlf.la.gov>, Randall Pausina <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>, John Milner <GulfCouncil@gulfcouncil.org>, <fra@tampabay.rr.com>

Dear Sirs,

Gulf Council Amendment 35 - greater amberjack

As a recreational fisherman and spearfisherman, we are concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

On action 2.1 - Modify the recreational minimum size limit, Alternative three is the most acceptable. Modify the minimum size limit for greater amberjack to 34 inches fork length.

50% of female greater amberjack are reproductively mature at approximately 35 inches fork length. Increasing the minimum size limit for greater amberjack is beneficial to increasing the spawning potential of the stock, according to the Council's scoping document.

Raising the minimum recreational size limit increases angler opportunity, achieves a reduction in harvest and increases the spawning potential of the stock. This should be the preferred option. Positive economic impact, positive biological impact, and achievement of a landings reduction are ALL available with this decision. It is beyond a reasonable person's understanding why this management option is not preferred.

Furthermore, table 2.2.2 is confusing and certainly raises grave concerns over the discard mortality rates used to generate such high total removal numbers at 34 and 36 inch fork length minimums.

The recreational fishing community would like to see an alternative which

allows for a concurrent recreational and commercial closure, if in fact that closure is to provide protection to spawning aggregations. Given that a three-month closure would be applied with a 34 inch fork length, we would like to see what a two fish angler bag limit alternative would produce in terms of landings.

#### Commercial management measures

Simply put, commercial amberjack should be limited to 1000 pounds per trip. This will reduce over capitalization and provide a more consistent market for the fishermen and a consistently fresh supply for the consumer. It will also have a positive biological impact on the fishery.

To recap:

Set ABC = ACT. No 18% reduction.

Opportunity to fish `creates jobs and maintains communities.

Recreational 34" fork length -

increases spawning potential of the stock

reduces recreational landings

creates fishing opportunity and JOBS

Why is this not the preferred alternative?

A March through May recreational closure combined with a 34 inch minimum length could even allow for a two amberjack per angler daily limit. This would further increase the opportunity to fish thereby increasing economic activity and creating jobs.

Commercial trip limits should be set at 1000 pounds.

On another note: What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Oscar Menendez

4945 Westbreeze Cir.

Palm Harbor FL 34683

727-942-2307

Subject: Regarding - Amendment 35 - greater amberjack  
Date: Wednesday, February 1, 2012 8:01 AM  
From: Michael Jackson <mjackson@ez-tender.com>  
To: Pamela Dana <fish@surelurecharters.com>, Bob Gill <bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>, <intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>, Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>, <info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>, Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron Fischer <mfischer@wlf.la.gov>, Randall Pausina <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>, John Milner <GulfCouncil@gulfcouncil.org>, <FRA@tampabay.rr.com>  
Cc: Dennis O'Hern <dohern@tampabay.rr.com>  
Conversation: Regarding - Amendment 35 - greater amberjack

I am concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. It is apparfent that this reduction is being applied in the name of "uncertainty". This would implying that no uncertainty was built-in to the stock assessment that generated the current catch data. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and your management processes. Uncertainty stacked on top of further uncertainties quite simply results in unnecessary job loss and unnecessary loss of fishing opportunity. The Council should set Allowable Biological Catch equal to the Annual Catch Target. The council is not required by law to set it any lower.

On action 2.1 - Modify the recreational minimum size limit - Alternative three is the most acceptable. Modify the minimum size limit for greater amberjack to 34 inches fork length.

50% of female greater amberjack are reproductively mature at approximately 35 inches fork length. Increasing the minimum size limit for greater amberjack will increase the spawning potential of the stock. This is according to the Council's own scoping document.

Raising the minimum recreational size limit increases angler opportunity, achieves a reduction in harvest and increases the spawning potential of the stock. This should be the preferred option. Positive economic impact, positive biological impact, and achievement of a landings reduction will all be realized with this decision. It is beyond a reasonable person's understanding why this management option is not the preferred option!

Table 2.2.2 is confusing and raises serious concerns over the discard

mortality rates used to generate such high total removal numbers at 34 and 36 inch fork length minimums.

I would like to see an alternative that allows for a concurrent recreational and commercial closure, given that the closure is aimed at providing protection to spawning aggregations. Given that a three-month closure would be applied with a 34 inch fork length, I would like to see what a two fish angler bag limit alternative would produce in terms of landings.

Commercial management measures:

Commercial amberjack should be limited to 1000 pounds per trip. This will reduce over capitalization and provide a more consistent market for the fishermen and a consistently fresh supply for the consumer. It will also have a positive biological impact on the fishery.

Recapping my comments / requests:

Set ABC = ACT. No 18% reduction.

Opportunity to fish creates jobs and maintains communities.

A recreational 34 inch fork length will;

- 1) substantially increase the spawning potential of the stock
- 2) reduce recreational landings
- 3) create fishing opportunities and jobs

Why is this not the preferred alternative?

Using a March through May recreational closure combined with a 34 inch minimum length would allow for a two amberjack per angler daily limit. This would further increase the opportunity to fish, and thereby increase economic activity and create jobs!

Commercial trip limits should be set at 1000 pounds.

Finally, please cease and desist on any actions geared towards sector separation and catch shares. These ill-advised and divisive management schemes aimed at "dividing-and-conquering" are not true management at all.

Thank you for considering my comments regarding amendment 35 for greater amberjack.

Mike Jackson

124 Windward Island

Clearwater, Florida 33767

Subject: Public Comment  
Date: Wednesday, February 1, 2012 8:59 AM  
From: Mike Rowell <mike@captainmikesfishing.com>  
To: Gary Jarvis <GJabd@aol.com>  
Cc: Info <Info@gulfcouncil.org>  
Conversation: Public Comment

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Captain Mike Rowell 204  
West Spruce Av.  
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#### Council Members

Unfortunately I am not available to come to the council meetings in Mobile this week but I would like you to consider my comments in your decision making.

I understand there was much debate in the reef fish committee meeting about the issue of greater amberjack management and there is support for a size increase to 35 inches within council members to address a issue about letting AJ grow to a size that supports breeding maturity based on a scientific review. Until the findings are conclusive, I do not support the increase in size limits for Greater Amberjack.

I also understand here is also a large contingent of private recreational anglers who want AJ open in June and July and they also support closing AJ during the spring, March, April and May, so they can fish the previous mentioned months. This would mean that during spring break after a long cold and no money generating winter that we would have red snapper, gag grouper and AJ all closed during spring break, Easter vacation and late May when the senior students are out of school.

As part of the charter for hire sector, I would ask you to “put yourself in my shoes” when you make your decisions. We need some stability in our industry. We need to fish as many months of the year as possible. I do not want multiple species closed at the same time.

We have been promised longer seasons, more TAC ect, ect, ect, and it seems

all we get is the opposite.

The environmental groups have infested the system and their money has given them the power to drive this train and it has got to stop! They are more interested in fish than people!

Example:

After Hurricane Ivan, when the beach restoration was underway, a shrimp boat was required to follow ahead of the dredge as an attempt to catch turtles that may get caught up in the dredge. That is great! It was a very good idea. The dredge was able to pump sand from a couple of hundred yards offshore directly to the shoreline. But the minute a turtle was killed in the dredge, the whole operation was shut down. The dredge was required to move offshore and haul sand back and forth to the beach costing more money and slowing down the rebuilding of the shoreline.

Along the same time, a construction worker was killed on a job site at the beach. The next day the work on that construction site continued.

I want sustainable fisheries, but we need to use some common sense. Caution is always given to the fish. What about the fisherman and the economy? Our country is Trillions of dollars in debt and if the enviro's didn't push so hard with their precautionary approach we could raise our catch limits, which would instantly generate more money into the economy and we could still maintain sustainable fisheries.

Example:

As a member of the Red Snapper Ad Hoc, we were charged to come up with new ideas to reduce dead discards. Circle hooks and other harvest methods were already being considered, they wanted new ideas. The only new idea we could come up with was, "Don't put a hook in the water with bait on it". This sound sarcastic but we couldn't come up with much more than what had already been purposed. And by the way, until you convince me otherwise, this is what the enviro's ultimately want anyway, No Fishing!

With regards to Red Snapper, I truly believe if we doubled the tac, we would not hurt the population. Reason, dead discards. If their dead, their dead. Move those "dead discard snapper" from the dead discard column of the data over to the "dead landed" column and you still have the same amount of dead snapper just a lot less waste. We could bring them home, and everybody is happy. Well not everybody.

The farmer doesn't want all of the land, but he does want what is next to his and a scientist always wants more data. Please add in some good old common sense too.

Respectfully Submitted  
Captain Mike Rowell

For a Good Time Call  
251-981-2081  
www.captainmikesfishing.com <<http://www.captainmikesfishing.com>>

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'Government is like a baby:  
An alimentary canal with a  
big appetite at one end and  
no sense of responsibility  
at the other'  
- Ronald Reagan

Subject: Gulf Council Amendment 35 - Gulf of Mexico Greater Amberjack  
Date: Wednesday, February 1, 2012 9:15 AM  
From: Ed Roberts <divebudzinc@hotmail.com>  
To: Pamela Dana <fish@surelurecharters.com>, Bob Gill  
<bgillbgill@embarqmail.com>, <lable@fsu.edu>, <jaguar1@usouthal.edu>,  
<intimidatorcarters@yahoo.com>, Kay Williams <hkaywilliams@hotmail.com>,  
Tom McIlwain <tom.mcilwain@usm.edu>, Harlon Pearce <nolrah@aol.com>,  
<info@superstrikecharters.com>, Douglass Boyd <douglassboyd@yahoo.com>,  
Patrick Riley <p.f.riley@comcast.net>, <nick.wiley@myfwc.com>, Kevin Anson  
<Kevin.Ansen@dcnr.alabama.gov>, <corky.perret@dmr.state.ms.us>, Myron  
Fischer <mfischer@wlf.la.gov>, Randall Pausina  
<rpausina@wlf.louisiana.gov>, Robin Riechers  
<robin.riechers@tpwd.state.tx.us>, Roy Crabtree <roy.crabtree@noaa.gov>,  
John Milner <GulfCouncil@gulfcouncil.org>, <fra@tampabay.rr.com>  
Conversation: Gulf Council Amendment 35 - Gulf of Mexico Greater Amberjack

To all those involved in this delicate issue:

I am concerned with an arbitrary 18% reduction in allowable catch for greater amberjack. This reduction is being applied in the name of "uncertainty", implying that no uncertainty was built-in to the stock assessment that generated the current catch numbers. In fact, a great deal of uncertainty has been built-in at each level of the stock assessment and management process. Uncertainty times uncertainty equals unnecessary job loss and unnecessary loss of fishing opportunity. Set Allowable Biological Catch equal to the Annual Catch Target. You are not required by law to set it any lower.

On action 2.1 - Modify the recreational minimum size limit, Alternative THREE is the most acceptable. Modify the minimum size limit for greater amberjack to 34 inches fork length

50% of female greater amberjack are reproductively mature at approximately 35 inches fork length. Increasing the minimum size limit for greater amberjack is beneficial to increasing the spawning potential of the stock, according to the Council's scoping document.

Raising the minimum recreational size limit increases angler opportunity, achieves a reduction in harvest and increases the spawning potential of the stock. This SHOULD be the preferred option. Positive economic impact, positive biological impact, and achievement of a landings reduction are ALL available with this decision. It is beyond a reasonable person's understanding why this management option is not preferred.

Furthermore, table 2.2.2 is confusing and certainly raises grave concerns over the discard mortality rates used to generate such high total removal numbers at 34 and 36 inch fork length minimums.

The recreational fishing community would like to see an alternative which allows for a concurrent recreational and commercial closure, if in fact that closure is to provide protection to spawning aggregations. Given that a three-month closure would be applied with a 34 inch fork length, we would like to see what a two fish angler bag limit alternative would produce in terms of landings.

Commercial management measures Simply put, commercial amberjack should be limited to 1000 pounds per trip.

This will reduce over capitalization and provide a more consistent market for the fishermen and a consistently fresh supply for the consumer. It will also have a positive biological impact on the fishery.

To recap:

Set ABC = ACT. No 18% reduction.

Opportunity to fish creates jobs and maintains communities.

Recreational 34" fork length:

- Increases spawning potential of the stock
- Reduces recreational landings
- Creates fishing opportunity and JOBS

Why is this not the preferred alternative?

A March through May recreational closure combined with a 34 inch minimum length could even allow for a two amberjack per angler daily limit. This would further increase the opportunity to fish thereby increasing economic activity and creating jobs.

Commercial trip limits should be set at 1000 pounds.

On another note: What part of NO SECTOR SEPARATION and NO CATCH SHARES did you not hear?

Thank you for your concern and attention to this matter,

-Edward Roberts; CITIZEN, VOTER, & ANGLER

360 Royal Palms Dr.

Largo, FL 33771

Subject: <no subject>

Date: Wednesday, February 1, 2012 8:32 AM

From: Wayne <whbarley@aol.com>

To: Info <Info@gulfcouncil.org>

Dear Sirs,

I, am a recreational fisherman that strongly disagrees with the closure of Amber Jack season during Snapper season and also disagree with the size limit increase. We fishermen have watched our Snapper seasons and limits take hit after hit when there are more snapper now than I have seen in over 25 years of fishing in the Gulf! Now you are wanting to stick it to us again on Amber Jack?

Really???

Sincerely,

Wayne Barley

Subject: Amber  
Date: Wednesday, February 1, 2012 9:22 AM  
From: Aquastarcharters@aol.com  
To: Info <Info@gulfcouncil.org>  
Conversation: Amber

To: Gulf Council,

I have found the Amberjack stock to be plentiful and easy to find in 2011. I don't want the closed season or size limit of 30 inches to change from the 2011 season. My observations show me these limits are working very well to conserve the resource and allow a reasonable fishing season. This will also keep us from having unnecessary discard of under size fish.

Thank you,

Steve Foust  
owner/operator  
charter boat Aquastar  
Orange Beach, AL.

Subject: Amberjack regulations  
Date: Wednesday, February 1, 2012 9:31 AM  
From: Stan Phillips <destinfishinginfo@gmail.com>  
To: Info <Info@gulfcouncil.org>  
Conversation: Amberjack regulations

Gulf Council Members,

I own and operate a charter fishing vessel in Destin, FL. I also have a degree in marine biology from the University of South Alabama (1991). I fully understand the need for regulations and the complexities of management decisions. Our business has changed tremendously over the last 10 years, but the one saving grace was that there was always some part of the fishery open. This proposed amberjack closure in the spring and fall would change that and really cripple this industry. There are plenty of options already in the summer months to supplement the red snappers, especially all the pelagic species. In the spring, with amberjacks closed, you would essentially leave us nothing to catch. I hope that one day in the future of fishery management there will be a time when all species are available all the time, but until then we at least need one of the big three (snappers, groupers, amberjack) open spring summer and fall. Thanks for your time and consideration,

Thanks again,  
Stan Phillips  
DestinFamilyFishing.com  
(850) 259-3778

Subject: Amberjack regulation  
Date: Wednesday, February 1, 2012 12:17 PM  
From: Seaprize <Seaprize@cox.net>  
To: Info <Info@gulfcouncil.org>  
Conversation: Amberjack regulation

Dear Council:

I am a >20 year veteren of the reef fishing charter industry. Closing AJ during red snapper & grouper closure would decimate my business & possibly the industry. Hurricanes, economy collapse, & an oil spill have pretty much closed the coughin's lid. I support that gag grouper is overfished & should maintain stringent regulations but I strongly dissagree with red snapper & amberjack. Closing the top 3 species simultaneously will crush us.

Please consider that nobody wants to target edible fish on a charterboat if you can't retain & eat something for the cost & effort. Most people realize that bringing back enough for a few meals is acceptable but releasing everything forces the cost of chartering to be unfeasable & discouraging event to do on vacation!

Capt. Steven R. Lathi

Subject: Comments

Date: Wednesday, February 1, 2012 1:39 PM

From: Don McPherson <getawaycharters@yahoo.com>

To: Info <Info@gulfcouncil.org>

Conversation: Comments

I am Don McPherson, owner and captain of Getaway Charters. I own two six - passenger charter boats out of Orange Beach, Alabama. I attended the Gulf Council meeting yesterday. I had planned on attending today but I left the meeting yesterday feeling so helpless and disgusted I just could not attend today. You guys have taken some extreme measures recently in the fisheries management. It has become a runaway train. Stop, pause, take a deep breath. We are seeing some good results from your management. I know The Federal Fisheries have many different groups of people to please. I realize you people work very hard. But please use some common sense with your decision making. I listen to the science experts and everyone wants all of these big buffers. Please relax the cushions and the buffers and just let your system work.

The amberjack closure in the summer months was very drastic to most of us fishermen. We are dealing with it. Now you want to increase amberjack to 35 inches? The amberjack were not overfished in 2011. Give your system time to work. Please loosen up on the rope. You are killing us.

Common sense and time. Give your system time to work. Have patience.

Thank you,  
Captain Don McPherson  
www.getawaycharters.com  
251-981-8047

Subject: AJ changes...

Date: Wednesday, February 1, 2012 1:01 PM

From: Matt Braselton <braseltonm@fc.manatee.k12.fl.us>

To: Info <Info@gulfcouncil.org>

Conversation: AJ changes...

Good Afternoon- My name is Matt Braselton and i am an avid offshore rec angler- It is to my understanding some of the changes to be voted on include a three month closed season (march April May) and an increase to 35'' fork length for harvesting. What evidence is making this change happen? Is there clear cut numbers that suggest over fishing?? Im under the full understanding that this NOT being blamed on over fishing or annual catch limits... Also this would leave us with NO TARGET species for the entire month of march- I really hope you guys know what your doing because it sounds like there is no specific reasoning in this change!! You constantly kill the rec angler who are AMERICAN PEOPLE deserving to keep our fish!! The numbers if AJ's out of Manatee/Sarasota counties is at an all time high (15+ years of offshore fishing) yet you want to close down a fish increase the minimum size and it has nothing to do with our ACL?? I hope you will realize what you do to the little guy!! What a JOKE!!!!!!!

Champions do not become champions when they win the event, but in the hours, weeks, months and years they spend preparing for it. The victorious performance itself is merely the demonstration of their championship character.

Matt Braselton  
Assistant Football Coach  
Southeast High School

Subject: Amberjack

Date: Thursday, February 2, 2012 12:01 PM

From: Bobbi Walker <chancyw@gulftel.com>

Reply-To: "Bobbi M. Walker" <chancyw@gulftel.com>

To: Info <Info@gulfcouncil.org>

Cc: Bob Shipp <rshipp@jaguar1.usouthal.edu>, Corky Perret

<Corky.Perret@dmr.ms.gov>, Bob Gill <bgillbgill@embarqmail.com>, John

Greene <intimidatorcharters@yahoo.com>, Tom McIlwain

<tom.mcilwain@usm.edu>, Robin Riechers <robin.riechers@tpwd.state.tx.us>,

Roy Crabtree <roy.crabtree@noaa.gov>, Myron Fischer <mfischer@wlf.la.gov>

Conversation: Amberjack

Dear Council Members,

It is very important to my business to keep the stability in seasons in order to make a business plan for the coming year.

I need balanced seasons so that some resource is open for harvest during the whole year. Until there is absolute evidence that the 2011 Amberjack regulations are not keeping us within the constraints of our ACL I do not support an increase in size limit nor a spring closure.

Thank you for giving my request some consideration.

Wish I could be with ya'll this week, but am working hard in Orange Beach!  
Bobbi

Subject: Question on Amberjack Closing on March 1, 2012  
Date: Thursday, February 2, 2012 1:12 PM  
From: Pam Poore <pampoore@gmail.com>  
To: Info <Info@gulfcouncil.org>  
Cc: Pam Poore <pampoore@gmail.com>  
Conversation: Question on Amberjack Closing on March 1, 2012

It has just come to our attention that the Council is considering closing Amberjack starting on March 1, 2012.

Our off-shore charter fishing business is located on the SW Gulf Coast in Englewood, Florida/Stump Pass Marina.

Right now, we're already under a complete Grouper closing until April 1, 2012.

The only other species that the snowbirds and seasonal tourists want to catch on their charters that are "keepable" right now are Amberjack and Snapper.

If you close the Amberjack, you're essentially forcing fishing charters to ONLY be able to catch snapper for their fishing charters.

This will greatly impact our already declining fishing charters due to the closing of the grouper in the Gulf right now.

It seems to me, that the closings could be more effective in the summer months, not when the snowbirds and tourists are here. Isn't Florida a tourist friendly state? If we stop offering keeper species of fish during tourist/snowbird season, you're going to put every charter fishing operation out of business! That's the time of year we have to make our income, just like any other tourism-related industry in Florida. Not to mention the fact that you're trying to as take away one of the greatest adventure options for tourists here in our area.

When these decisions are made, I understand that they are related to the "numbers" of fish in the area. Are the numbers actually being taken this far South?

From what I've been reading, the numbers are being taken further North in Gulf where the fishery numbers are very different than the Southern part of the Gulf.

Also, do you take into consideration when deciding on what and when to close a species how much the weather has to be taken into account when you're considering a time-frame to close a species?

Does anyone ever talk to the charter fisherman to see how much they're actually fishing? Did you know that the entire month of December the wind blew and we couldn't even take charters out for 90% of the month? Then when January came around, Gag grouper were closed when the weather got better. Then all grouper were closed on Feb 1st and all we have left to provide for our clients and customers are AJ's and snapper right now? How

is our industry supposed to stay in business and compete if there are no keepable species of fish when the tourists are here?

Thank you in advance for taking the time to read my letter. The charter fishing industry in this area of SW Florida is already struggling...and any more species closings will make it impossible for us to make a living in this business. We need to be able to provide a much needed service for our tourism clients during the time of year that they're here. Anything you could do to keep the AJ's open would be greatly appreciated. Thank you.

--Pam

Pam & Captain Richard Lee Poore  
DockOar Charters /L&P Charters, LLC  
68 Mark Twain Lane  
Rotonda West, FL 33947  
941-698-5735  
[www.DockOar.com](http://www.DockOar.com) <<http://www.DockOar.com>>



This is a rare WIN, WIN, WIN situation.

Let me know what you think

Walter Stone,  
Recreational Fisherman  
Jefferson Parish, LA  
504-885-5190