

PUBLIC SUBMISSION

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Docket: NOAA-NMFS-2021-0049

Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

EPA NOA Fed Reg Notice

Document: NOAA-NMFS-2021-0049-0003

Comment from Beneduci, Martha

Submitter Information

Name: Martha Beneduci

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General Comment

I ve been in the commercial fishing industry and owned commercial fishing boats to Hudson Florida since 1987. I ve seen the government rip the commercial fishing industry apart starting in 1990. Since then and with Nafta coming into play under Clinton it has been a BIG down hill struggle to stay in the game. I felt the with the shares system it would be a more even playing field. I know since the 1990 s the U S government wanted Florida to be strictly recreational fishing and end commercial fishing . But hoped it would not happen in my life time . But looks like you are getting pretty close to shutting one of the oldest industries down. We compete against tariff free fish from Mexico and Latin America and our government wants big money from tourists and rich people, you should leave the percentages where they are.

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Comment On: NOAA-NMFS-2021-0049-0001

EPA NOA Fed Reg Notice

Document: NOAA-NMFS-2021-0049-0004

Comment from Booher, Sam

Submitter Information

Name: Sam Booher

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General Comment

I am very concerned about both over-fishing different species species but even more important is the question does every species have protected areas that allows no fishing to even include scuba diving which really means scuba fishing. No where did I see where over-fish is checked before the fishing season is announced nor did I see any maps or even recognition that protect areas are set aside that do not allow fishing or scuba diving

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Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

EPA NOA Fed Reg Notice

Document: NOAA-NMFS-2021-0049-0005

Comment from Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

Gulf Coast Fishery Management needs look at commercial fishing side of not only red grouper but everything else that commercial industry catches. That's what's hurting our fishing industry not by only over fishing but also on by catch that they are catching and discarding. It's not on the recreational side. Between days that recreational fisherman can get out and even go out in Gulf of Mexico especially in Texas to even catch red grouper is not many days. You guys need keep that in context when your settings these regulations. Last year there was only maybe 30 fishable days during 60 day snapper season that anybody could even fish due weather and wind. So it's even worse during winter months when you really fish for grouper. Right now month May when Amberjack season is open we've only had maybe three days when people get out fish and next two weeks nobody going be able get out due weather with seas 5 feet plus. You guys need take all these factors in consideration when your making these fishing regulations.

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Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

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Document: NOAA-NMFS-2021-0049-0006

Comment from Weiss, Les

Submitter Information

Name: Les Weiss

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General Comment

I feel you should adopt the 59.3/40.7 choice. The commercial fishery impacts the quotas and overfishing than the recreational sector.

If you cut the recreational qouta it will effect every aspect of tourism, local businesses and commerce. That is the last thing we need in this economy. It's bad enough fuel prices are climbing along with everything else.

If you cut the quotas on recreational sector it could be devastating.

Thank You,

Les Weiss

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Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

EPA NOA Fed Reg Notice

Document: NOAA-NMFS-2021-0049-0007

Comment from Jacques, Harry

Submitter Information

Name: Harry Jacques

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General Comment

I agree with amendment 53 that increases the red grouper recreational allocation.

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Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

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Document: NOAA-NMFS-2021-0049-0008

Comment from Saussy, Charles

Submitter Information

Name: Charles Saussy

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General Comment

I am an avid recreational diver spear fisher in the Gulf Of Mexico for the past 30 years. Dives over the past two/three years have been virtually void of legal size Red Grouper. It's my understanding that Commercial fisherman can keep red grouper 18" and up so I would suggest that is why there are almost no 20" left. It is way past time the size limits and commercial catch shares program for these fish changes. There are catch share brokers leasing their catch shares making limits unlimited and closed season never closed. Just make it a resource recovery plan that is good for all not just one sector or the other. Put slot limits on fish so that mature breeders are allowed to reproduce the species in mass. Move all commercial reef fishing out past 50 miles from shore. Stop the bait shrimper bycatch near shore that is decimating a host of juvenile species. Many of these boats make the nightly bycatch their staple and shrimp secondary. I realize the commercial lobbies and interest are at every meeting and flood money the fishery management while Recreational interest are scattered but this should be about health of of specific resources and not the health of one group or another. Close red grouper season for both recreational and commercial share holders at the same time and you will be managing the resource instead of special interest. My two cents.

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Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

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Document: NOAA-NMFS-2021-0049-0009

Comment from RUSSELL, E.R.

Submitter Information

Name: E.R. RUSSELL

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General Comment

Giving the recreational sector a larger share is an appropriate move. One of the basic problems with your approach is the inclusion of the private boat owner in the group with charter boats and head boats. I have fished for red group out ,of Naples for 20 years. Charter boats and head boat caught most of the fish. The reasons are simple: they know where to go, the go very often and they can go out far. Also I would raise the size limit to 21 minimum and 30 maximum.

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Notice of Availability for a Draft Environmental Impact Statement for Management of Red Grouper in the Gulf of Mexico

Comment On: NOAA-NMFS-2021-0049-0001

EPA NOA Fed Reg Notice

Document: NOAA-NMFS-2021-0049-0010

Comment from Southern Offshore Fishing Association

Submitter Information

Email: info@southernoffshorefishermen.com

Organization: Southern Offshore Fishing Association

General Comment

I wish to comment on behalf of the members of the Southern Offshore Fishing Association (SOFA). Amendment 53 has been on going for several years. The majority of the information and data contained in the proposed amendment are also several years old. The statements that the red grouper commercial fishermen made stating red grouper were not as abundant, not as large, and fewer in traditional fishing grounds were true at the time. Since those statements these same commercial red grouper fishermen have provided much testimony that in recent years (2019-2021) that the red grouper fishery is rebounding as more small fish were being harvested and released and these fishermen have stated as those red grouper grew up they would be entering the fishery and catches would increase. Recent catches (Jan-May 2021) have proven those statements to be true as the commercial red grouper catches are greater than 10% higher than the 2018 to 2020 harvest levels. Red grouper commercial fishermen have recorded record catches since Jan 2021.

At the Gulf Council meeting in Galveston, TX in Oct 2018 the NMFS presented the new mrip mail fes recreational survey data for red grouper. This mail fes survey has been ripe with much controversy since it was released. The dramatic increases in historical rec catches of red grouper, indeed all fisheries where there is a rec component, are not only realistic but laughable. These historical rec catches are based on computer modeling based on how fisheries are prosecuted in todays world and assuming the same technology, effort, and desire for rec fishing today existed since 1986. Anyone who fished in those early years knows the data produced by the computers is not possible. Until the high level of controversy about the mail fes survey is fully vetted so all stakeholders have some confidence in the numbers the data from this survey should not be used in amendment 53.

It must be noted that any change in the red grouper allocation from the current 76% commercial/24% recreational will only serve to harm both the commercial fishermen and recreational fishermen. Reducing the commercial allocation by over 16% will significantly harm the commercial fishermen, local small family owned fish houses, the local fishing communities they serve, consumers who purchase fish for self consumption, restaurants who serve multiple thousands of customers, and the many supporting businesses

who fishermen depend on. Increasing the recreational quota by over 16% will provide negative impacts to the recreational anglers and their supporting businesses such as tackle shops, marinas, fuel sellers, hotels, state marine resources departments by lack of rec license sales, and more due to the fact that the mail fes survey shows such high recreational landings that in recent years the rec sector would have overfished their quota meaning drastic changes will have to be made to the current rec season, bag limits, and size limits. The proposed changes to this fishery in amendment 53 provide no benefits to anyone and to the red grouper stock. In essence, the proposed changes only serve to harm all fishing sectors, all local fishing communities, all supporting businesses, all consumers, while doing nothing to improve the red grouper stock.

The members of SOFA strongly recommend status quo on the current allocation and quotas. The vast majority of all involved in the red grouper fishery are of the same opinion and recommendation. The proposed changes in amendment 53 should all be status quo.

Capt Bob Zales, II

Fishery Management Consultant