SEDAR 73 Public Comment

Various Authors

SEDAR73-WP17

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All public comments and the attached PDF have been compiled in the document below. One comment was submitted.

Entry Id	Name	Last	Date	Email	If your comments contain official letterhead, electronic signatures, graphics, or is a PDF, attach your comment here	Date Created
1	James	Hull	2020-09-05	hullsseafood@aol.com	jimmyhullredsnappecouncilbamcommentrhh.pdf	2020-09-07 11:21:17

Please type your comments in the space provided below for SEDAR 73 (South Atlantic Red Snapper).

I have been commercial fishing Atlantic Red Snappers for over 40-years out of my home port of Ponce de Leon Inlet on the central east coast of Florida. The offshore reefs of this region are considered the hub of the Atlantic Red Snapper stock. The SEDAR stock assessment results have completely missed the rebuilding and domination of the Red Snapper population on the reefs of The South Atlantic. The lack of a continuous Hook and line sampling data collection program is mostly to blame. As stated by a fisheries scientist that "All models are wrong, but some are useful". Not only are these model results Wrong but their Mis- Characterization of the this Stocks age structure, Productivity and Life History has been very Harmful to Coastal Fishing communities, Fisherman, Business, Consumers, the Red Snapper stock itself and the associated species Eco System of stocks. So Here we are 12 years after SEDAR 15 and a mostly closed fishery. We have an opportunity with SEDAR 73 to include New Observed data collected by the State of Florida over the past 10 years. Now is the time to Correct the Model inputs such as Chevron trap selectivity, Abundance of older aged animals in the Population and the Productivity of the 8 to 15 year old animals that Permeate the current stock. Fisherman have been actively involved in this process since the 2009 SEDAR 24 Data Workshop at the Francis Marion Hotel in Charleston SC and with Cooperative data collection. Now is the time to correct the wrong results of the past. We must include the Information and Data collected by the State of Florida over the past century in SEDAR 73. Attached is a comment I made in 2016, which supports my perspectives stated above. Thank You James G. Hull Jr. (Jimmy)

05 June 2016

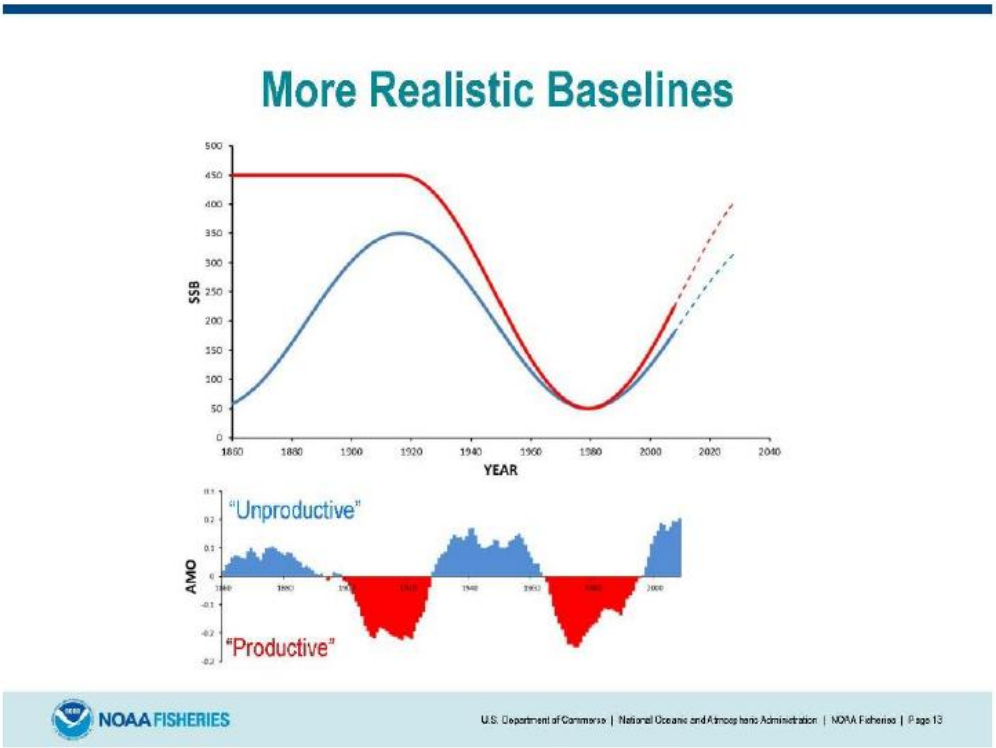
South Atlantic Fishery Management Council (SAFMC) Southeast Data, Assessment & Review (SEDAR 41) Atlantic Red Snapper science and management written comment

South Atlantic Council Members:

My name is Captain Jimmy Hull, and I have been commercial fishing the Atlantic Red Snappers for over 40-years out of my home port of Ponce de Leon Inlet on the central east coast of Florida. The offshore reefs of this region are considered the hub of the Atlantic Red Snapper stock.

Thank you for giving me as a fisherman the opportunity to provide input about the current SEDAR 41 Red Snapper stock assessment modeling results. The science provided for the SAFMC by the National Marine Fisheries Service (NMFS) Southeast Fisheries Science Center (SEFSC) through the SEDAR 41 Beaufort Assessment Model (BAM) results indicate the Atlantic Red Snapper biomass by age to be the same as over 40 years ago at 1975 levels. The BAM results indicate that it is about at one-third of the biomass compared to over 60 years ago at 1955. As a result, the BAM indicates that the stock is overfished and overfishing is still occurring. Most fishermen and I disagree with this conclusion of the SEDAR 41 BAM analysis that the biomass is greatly reduced when compared to the historical levels.

As stated by a fisheries scientist that “All models are wrong, but some are useful”. The theoretical biomass at age baseline assumptions produced by the (BAM) age structured model prior to 1978 when empirical catch at age data started is the root cause of this model's failure to provide an accurate appraisal of the current Red Snapper stock.



From my experience during the 1970's fishing for Red Snapper was that it was hard work scanning the bottom with a fish finder machine looking for schools of Red Snapper to anchor on and harvest. The number of Red Snapper in the stock in the 1970's was much smaller than the current levels. At this time there were no size limits, bag or trip limits. On 31 August 1983, a 12-inch minimum size limit was implemented, and then on 01 January 1992 a 20-inch minimum size limit regulation became effective. Fishermen observed a quickly increasing improvement and rebuilding of the Red Snapper stock abundance from the 1990's to the present.

In the years following the 1992 new minimum size rule becoming implemented, fishermen observed several new age classes moving into the population. As a result fishermen began interacting and measuring fish, taking note of their observations as they witnessed a rebuilding Red Snapper biomass. Fishing was good, environmental factors and new management rules were working. Fishermen and the coastal fishing communities were onboard with accurate fisheries science and management.

The original NMFS Red Snapper stock assessment was conducted for the SAFMC and completed during 1998. http://sedarweb.org/docs/wsupp/S41_RD50_Manooch_etal1998.pdf The results indicated that the stock was rebuilding, while responding well to management. Fishermen's observations agreed with that conclusion and the improved data validated the results of that assessment. Yet later in time the NMFS Beaufort Lab failed to conduct a continuity run for the original stock assessment model, and instead completely changed to the BAM analysis with SEDAR to start assessing Atlantic Red Snappers.

In 2008, the SEDAR 15 final report indicated that the Red Snapper stock was overfished and overfishing was occurring, with only 500-thousand Red Snapper left in the NW Atlantic Ocean Red Snapper stock. Fisherman were shocked and disagreed. We found those conclusions to be the polar opposite of what we had observed fishing offshore for most of our lives.

By 2010, SEDAR 24 was completed under a truncated schedule, and the BAM results still indicated the Red Snapper stock was overfished and overfishing was occurring. The BAM analysts believed the stock had rebuilt just enough to avoid a complete closure of bottom fishing in many areas as shallow as 98-feet of depth out to 240-feet. Fishermen believed that these conclusions again were inconsistent with their fishing observations on the ocean.

Since 2009 other fishermen and I have been committed to working cooperatively with state and federal scientists to produce data in an attempt to better inform the BAM model of the abundant and rebuilding Red Snapper stock we have observed on the water. I believe not all of that collected data is being utilized correctly.

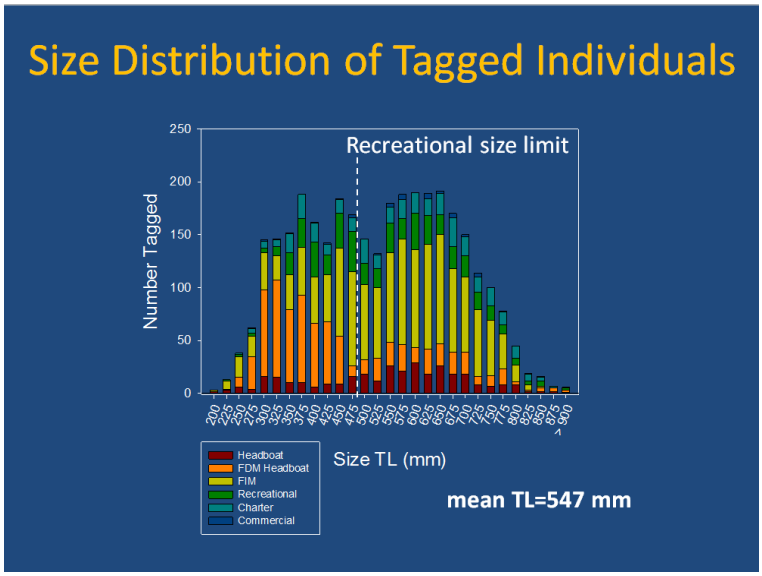
During 2010 fishermen were involved with a cooperative tagging program targeting the Atlantic Red Snapper while working with the State of Florida's Fish and Wildlife Conservation Commission (FWC), Fish & Wildlife Research Institute (FWRI) as they teamed with the Southeastern Fisheries Association (SFA) and the Gulf & South Atlantic Fisheries Foundation (GSAFF) supporting these efforts. This cooperative fishing project produced 3340 measured and tagged Red Snappers sampled along the east coast of Florida.

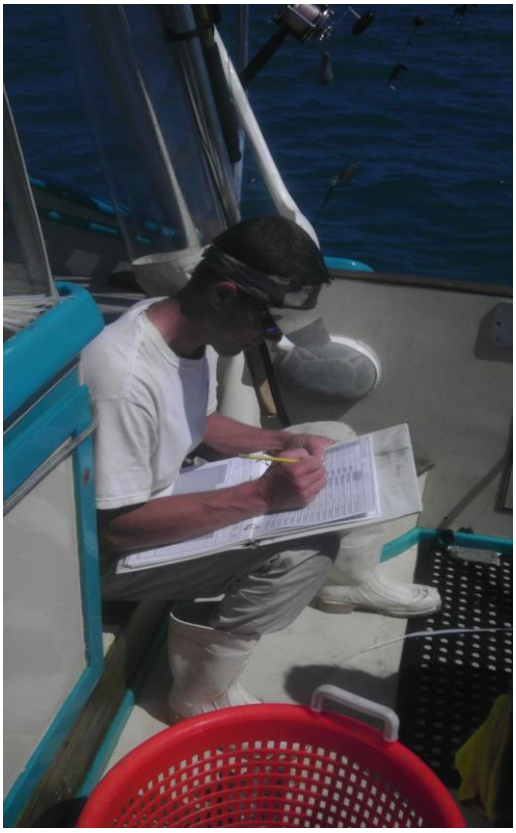
The mean total length (TL) of Red Snapper in this 2010 study was 547-mm (over 21-inches) which indicates the average age of the stock was 4-years old. That was 6-years ago and now the fish in that age class have moved thru the stock and the mean TL has increased significantly, now having grown into very productive 10-year old Red Snappers. These large fish can weigh over 20-pounds or more.

Fishermen, including myself are currently observing and interacting with abundant 800-mm (over 31-inches) in length Red Snapper in the population. This same study indicates many Red Snapper samples out to 900-mm (over 35-inches) in length were caught also. The fish that were 10-years old about six-years ago when this study was conducted are now highly fecund 16-year old Atlantic Red Snappers, all well over 20-pounds or more in size.

Fishermen agree with the results of the State of Florida data-rich intensive Red Snapper study thru our observations, the empirical data collected, plus the interactions with Red Snappers while deep sea fishing.

<u>Why doesn't the observed data in the BAM model show these older fish?</u>





Fishermen have been cooperatively collecting larger older fish beginning June 2009 with the FWC.

In 2012, a Red Snapper mini-season tournament sampling was conducted by Florida's FWRI scientists. The results of this study (see Figure 27 graph below) show that length frequencies of Red Snapper harvested indicate many Red Snappers were 650-mm and larger out to 880-mm and were more numerous than smaller Red Snappers measuring less than 650-mm in length. This sampling effort is providing observed data points of an increasing biomass of older, larger Red Snappers that are highly productive further adding recruitment to an ever expanding population.

Why doesn't the observed data in the BAM show these older age class fish in the population?

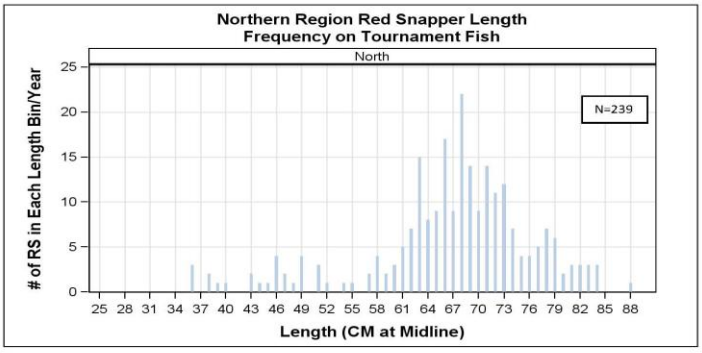
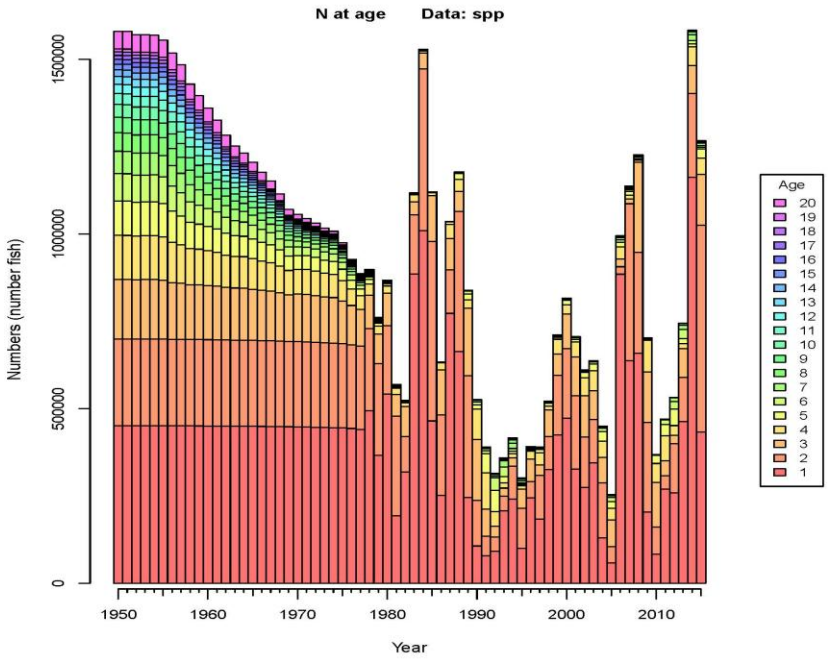


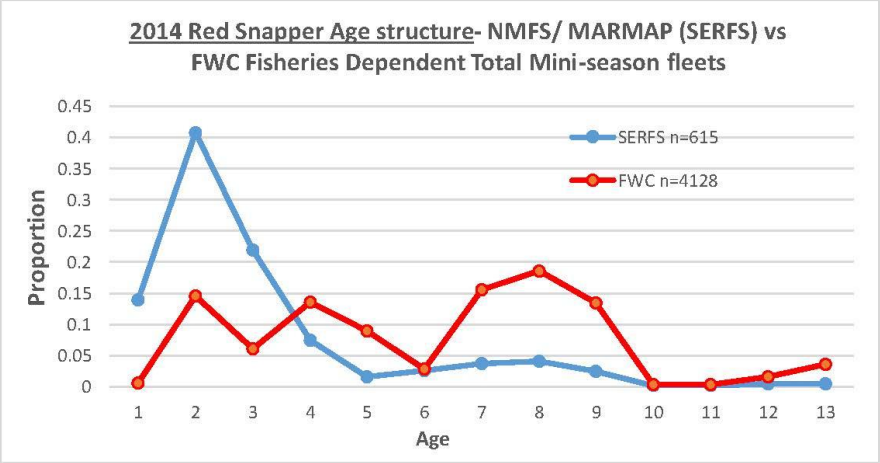
Figure 27. Length frequencies of red snapper from tournament samples (Northern Region). N = Number of observations, Percent = Number expressed as a percentage of overall totals for all inlets in the region. No Tournaments occurred in the Southern Region. Most samples were from Ponce Inlet (236 out of 239 total).

Recreational 2012 mini-season catch aboard charter boat Sea Lover.

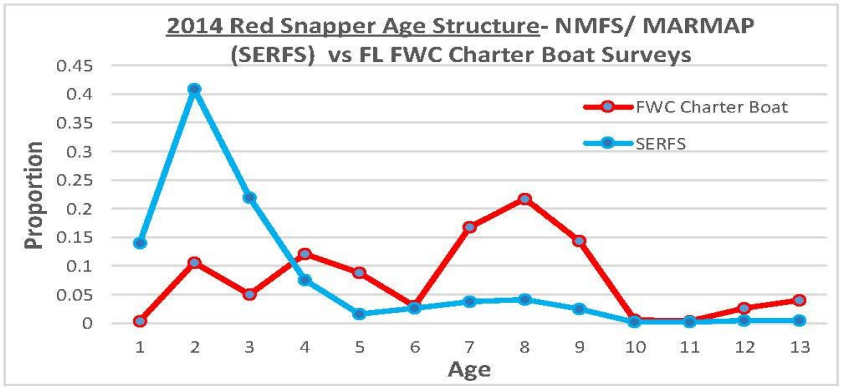
There has never been more abundant numbers of Red Snapper than at the current time on the Florida east coast. **The SEDAR 41 BAM results shows an increased recruitment thru observed data. We agree with the facts about observed recruits, and this BAM conclusion**. Fishermen have been reporting the increased abundance for many years, before the results of SEDAR 15, SEDAR 24 and SEDAR 41.



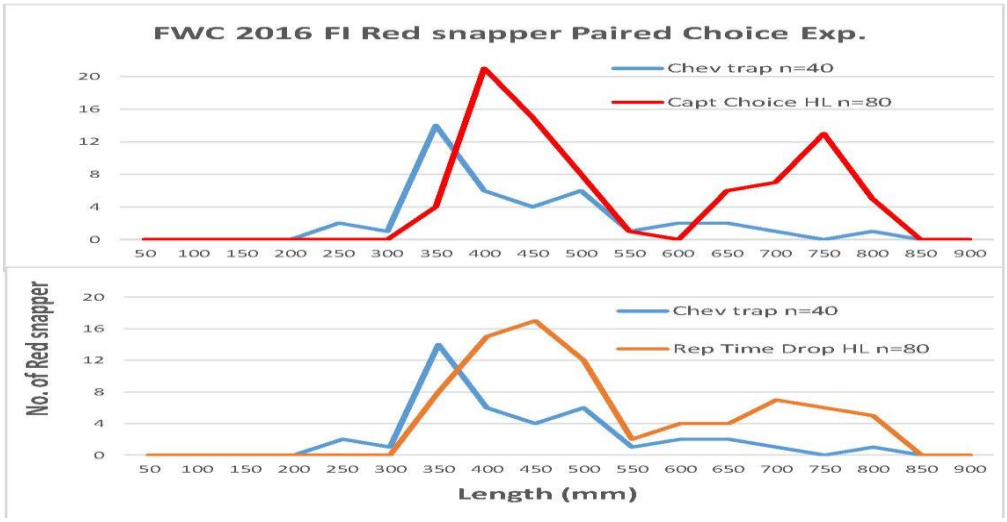
Now many years later the BAM results agree with fisherman that the Red Snapper stock abundance as measured in numbers of fish is larger than it has ever been. But we are told by the BAM analysts that because the model does not show this stock has enough 20, 30 and 40-year old fish that it is overfished, and the biomass at age cannot rebuild or sustain an open fishery. Fishermen disagree with the BAM results of a virgin population of very old Red Snapper as an assumption. We are advising the NMFS SEFSC Beaufort Lab analysts that our opinion is based on real observations not theoretical assumptions. The ten-year old Red Snappers are as large and fecund in general as twenty-plus year old Red Snappers.



The comparison of 2014 terminal year data of the BAM analysis primary indices from the MARMAP chevron trap and the FWRI mini-season data.

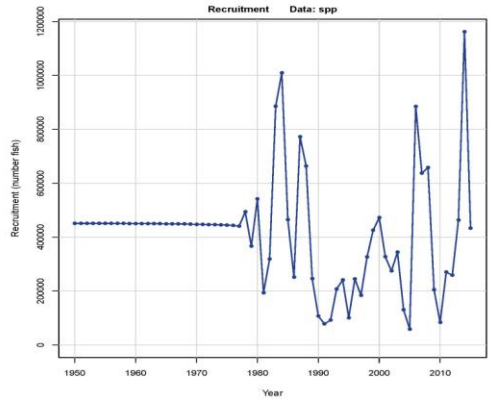


The most recent cooperative 2016 Fishery independent Red Snapper hook and line population survey shows a biomass at age much older than the BAM primary indices the MARMAP chevron trap survey.



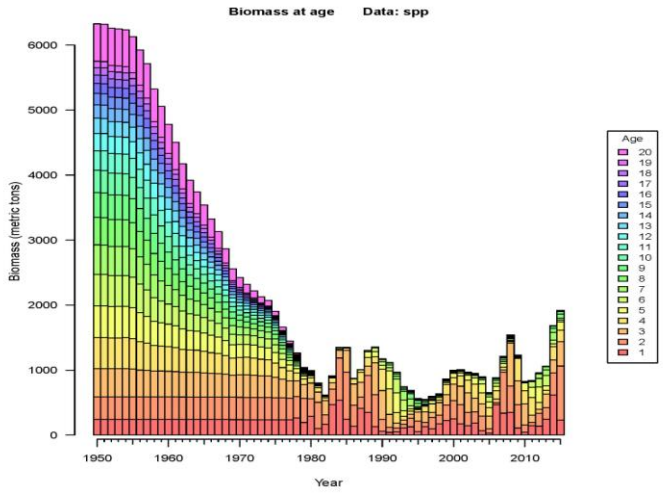
When referencing the frequency graph in numbers and the stock age structure graphs of Red Snappers above, fisherman agree that the Atlantic Red Snapper stock is rebuilt, both in abundance, and historical age structure as a sustainable stock. The model assumption of the BAM analysts that prior to 1978 the stock biomass was made up of many metric tons of fish much older than 10-years of age is not validated by any observed data or empirical data. The inaccurate assumptions of a huge biomass of long lived, older-aged Red Snappers has destroyed the BAM's ability (and credibility) to accurately assess the current Atlantic Red Snapper stock.

The current Red Snapper population is rebuilt as nature intended it to be to allow a sustainable use of this resource. This Atlantic Red Snapper stock is able to reproduce an abundance of new recruits (see bar graph above) in numbers never observed before. The Atlantic Red Snapper stock high recruitment periods are that of a totally rebuilt stock. (see graph below)



This Red Snapper stock is made up of highly productive, aggressive fish living in a very competitive ocean where they are both prey and predators depending on their sizes. Very few Red Snapper will ever normally survive beyond 20-years of age. That is the way it was prior to 1970's and that is the way it is today nearly 50-years later. The Atlantic Red Snapper stock rises and falls in abundance based on

recruitment, predation, competition, environmental factors and management efforts for fishing. This is not a fish stock hypothetically designed by a model to assume a stock structure of what it never has been, and never will be, a stock predominated by 20, 30 and 40-year old large Red Snappers.



This incorrect assumption about the historic biomass by the BAM analysts, and the mischaracterization of Red Snapper stock age structure by the chevron trap is what other fisherman and I personally had informed and presented to the SEDAR 41 RW Panelists and SSC Panelists. Unfortunately only one SSC panelist raised the question that the BAM results was not showing enough of the older aged fish. Only one panelist questioned the theoretical assumption of a huge stock of very old age fish prior to 1978. Silence was the only noise heard in the room and then the SSC panelists rubber stamped the SEDAR 41 assessment as the best available guidance for Council management. However, the SSC did decline to accept the overfishing status based on MRIP/APAIS dead discard assumptions. We the fishermen agree with that choice.

The observed data produced by the Florida FWC's recent data collection efforts support the perspectives that I have stated above. We believe that the Atlantic Red Snapper stock has rapidly rebuilt and is sustainable for an open fishery with robust production. The SAFMC voting membership should be given the opportunity to use every available tool and management option at their disposal to open this fishery back up in a useful way for the American citizens and economy of coastal fishing communities. Now is the time for the SAFMC membership to act. Now is the time to collect the fishery dependent, and fishery independent data. Now is the time to approve the new management approach, and options stated in the Ben Hartig and Greg Waugh document.
http://blog.safmc.net/download/Briefing%20Book%20June%202016/Snapper%20Grouper/A10b_RedSnapperMgmt_052316.pdf

Captain Jimmy Hull

F/V Sea Lover, F/V Denise Ann,
SAFMC Snapper-Grouper (SG) AP member, SAFMC SEDAR Pool member, SAFMC Citizen Scientist