

Subject: Re: comments on 2013 gag grouper season...and a followup!!
Date: Wednesday, October 31, 2012 9:53 AM
From: Capt. Andy Vaughn <andy@destin2fish.com>
To: John Milner <GulfCouncil@gulfcouncil.org>, <pamdana@yahoo.com>, <fishdestin@yahoo.com>
Conversation: comments on 2013 gag grouper season...and a followup!!

oops, my bad, i recommend AUGUST 1 til OCTOBER 31, please excuse my early morning mistakes.

On 2012-10-31 07:16, Capt. Andy Vaughn wrote:

- > The proposal to open the Gag Grouper season in June will hurt the
- > Destin charter fleet.
- > We have become very target oriented since the fisheries have adopted
- > closures. Even where we fish is of vital importance to preserving our
- > fisheries.
- > Stellar to this idea is our customers, who plan their vacations now
- > based on our ability to fish for a particular species.
- > I commend you on keeping Amberjack closed when Red snapper were open
- > in 2012.
- > This same thinking must also apply to Gag Grouper, a repeat of Gags
- > in 2012 would be critical to us having a good year in 2013. Open them
- > Sept 1, and close them Oct31. Let us have consistency our customers
- > can follow.
- > Your level headed thinking as always we trust in, remember your
- > decisions affect ALL the families of us as well.

--

Capt Andy Vaughn
charterboat "Special K"
Harborwalk Marina
Destin Florida 32540
259-5246

Subject: 2013 gag grouper season

Date: Wednesday, October 31, 2012 1:46 AM

From: fishdestin@yahoo.com

Reply-To: <fishdestin@yahoo.com>

To: John Milner <GulfCouncil@gulfcouncil.org>, Pamella Dana <pamdana@yahoo.com>, Jimgreen <destinfisherman@yahoo.com>, Scott Robson <sportfish1@cox.net>

Conversation: 2013 gag grouper season

Council members,

It is very important that gag grouper be open during the crucial month of October.

This is a vital to tHe Annual Destin Fishing Rodeo held each year in Oct. This is the 64th straight year for this fall event and is a huge economic engine here on the Gulf Coast and vital to Destin.

We would like gag to open on or near the date that the red snapper season ends and remain open until the quota is caught in November.

This is very important to the Northern Gulf coast.

Thank you for your time and consideration.

Capt mike eller

Destin, Fl

Sent from my BlackBerry® wireless device provided by SouthernLINC Wireless

449 Central Avenue
Suite 200
St. Petersburg FL 33701



Ocean Conservancy
Start a Sea Change

727.895.2188 Telephone
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www.oceanconservancy.org

October 29, 2012

Mr. Doug Boyd, Chair
Gulf of Mexico Fishery Management Council
2203 North Lois Avenue, Suite 1100
Tampa, FL 33607

RE: Framework action to set the 2013 gag recreational fishing season & bag limit & modify the February-March shallow-water grouper closed season

Dear Mr. Boyd:

On behalf of Ocean Conservancy,¹ please accept the following comments with respect to the Gulf of Mexico Fishery Management Council's (Council) public hearing draft reef fish AP framework action (gag framework amendment) to modify the 2013 gag recreational fishing season and the current recreational shallow-water grouper closed season. We support the Council's objective to provide optimal recreational fishing opportunities for gag, but the Council must ensure that total fishing mortality for gag remains below the levels needed to rebuild the gag population on schedule. We are concerned that the Council is considering taking action on management options proposed in the gag framework amendment at the October meeting without fully assessing the trade-offs and potential unintended consequences of implementing these actions. We recommend delaying final action on the shallow-water grouper spawning closure question until after the Council has had the opportunity to further evaluate likely biological consequences for gag and other shallow-water groupers from removing the spawning closure. Furthermore, we encourage the Council to avoid making overly optimistic assumptions when determining the 2013 season dates and lengths to avoid exceeding the annual catch limit (ACL) and triggering overage paybacks which would jeopardize the gag rebuilding plan and further restrict recreational fishing opportunities in 2014.

Action 1 – 2013 recreational gag season and bag limit

In Action 1, the Council is considering modifying the 2013 recreational gag fishing season in order to provide optimal fishing opportunities to the greatest amount of fishery participants. Subsetting the season is one option for accommodating the fishing preferences of various geographic regions, but there is a trade-off involved in terms of catch estimate accuracy and ability to restrain landings to the ACL. Splitting the season would present an increase in

¹ Ocean Conservancy, a non-profit organization with over 120,000 members, educates and empowers citizens to take action on behalf of the ocean. From the Arctic to the Gulf of Mexico to the halls of Congress, Ocean Conservancy brings people together to find solutions for our water planet. Informed by science, our work guides policy and engages people in protecting the ocean and its wildlife for future generations.

management uncertainty also because of the unknown impacts on fishermen's behavior that such an action would have. If the Council chooses to proceed with a split season for gag, we recommend the two sub-season option over the three season option to give the Council and NMFS the opportunity to evaluate such a management scenario. If this type of management is successful, the Council always has the option to go to three split seasons in the future if data availability allows it. Additionally, we oppose any split season scenario that spans multiple MRIP waves because NMFS and the Council would not be able to evaluate the first season's landings to accurately determine the closure date of the subsequent season. Furthermore, we strongly recommend that the Council base its estimate of season length on the high discard model estimates until there is evidence to the contrary. This will provide additional assurance that total mortality remains at or below the level specified in the rebuilding plan. Finally, if the Council does choose to move forward with a split season scenario, we recommend lowering the annual catch target (ACT) to account for the increase in management uncertainty that this change in management represents.

Action 2 – Modify the February-March recreational shallow-water grouper closure

In Action 2, the Council is considering changes to the current February 1 through March 31 recreational shallow-water grouper closure because the Council feels that the closure may not be needed anymore. We do not think that the Council currently has the information necessary to make an informed decision about this issue.

The Framework Action's Public Hearing Draft notes multiple problems and unknown outcomes associated with Alternatives 2, 3 and 4. For example, a one-month closure will be too short to be effective, harvest of red grouper would increase as a result, and there is an increased opportunity that modifying the closure would miss one or both peak spawning periods. Further, there is an unknown risk of increased bycatch and bycatch mortality of gag, and data does not exist to determine the proportion of recreational grouper harvest that occurs seaward of 20 fathoms.² The limited analysis of these alternatives shows that these alternatives may jeopardize the rebuilding timeline, and that the Council lacks important information. The Council should request NMFS perform a more robust analysis of discards and modeling of potential consequences of the various options before making a decision as well as consult shallow-water grouper fishery experts and its scientific and statistical committee on the likely biological and socio-economic impacts.


Conclusion

Gag are currently in year two of a ten year rebuilding plan – the maximum allowable time under the law. It is essential for the success of the rebuilding plan to remain at or below the rebuilding fishing mortality schedule in the initial years of the rebuilding plan in order to prevent further decreases in allowable landings later on in the plan. We strongly encourage the Council to carefully evaluate the trade-offs inherent in the management options proposed in this document and to choose options that have a high likelihood of constraining the fishery to the ACL and minimizing discards and discard mortality of gag. We do not recommend any changes to the current shallow-water grouper spawning closure until further evidence is presented that this action will not negatively affect gag and other shallow-water grouper species.

² Framework Action for Gag Recreational 2013 Season, Public Hearing Draft, at 18-20 (Sept. 2012).

We thank the Council for the opportunity to provide input and look forward to further continued work on ensuring the successful rebuilding of gag in the Gulf of Mexico.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Fetherston', with a long horizontal line extending to the right.

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



October 25, 2012

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

RE: Framework Action to Set the 2013 Gag Recreational Fishing Season and Modify the February-March Shallow-Water Grouper Closed Season

Dear Chairman Boyd:

Please accept these comments on behalf of the Pew Environment Group regarding the Public Hearing Draft for the Framework Action to set the 2013 Gag Recreational Fishing Season and Modify the February-March Shallow-Water Grouper (SWG) Closed Season. Our primary concerns are the potential that this proposed action will result in exploitation of grouper spawning aggregations, particularly for the depleted gag grouper population, and the likely increase in gag discard mortality. Appropriate scientific analysis and review has not been conducted for these proposed actions, and the level and quality of recreational catch statistics available now may be insufficient to allow for seasonal management of gag. Therefore, we urge the Council to delay action on this Framework until more robust analysis can be completed and the Council's Science and Statistical Committee (SSC) can review this analysis and the proposed measures to ensure this Framework Action will not undermine the gag rebuilding plan.

Specifically, we recommend:

- In Action 1:
 - The Framework Action should explicitly address whether the recreational data collection and monitoring program (*i.e.*, the Marine Recreational Information Program, (MRIP)) is sufficient to provide the preliminary catch estimates managers need to adequately monitor split recreational fishing seasons for gag and ensure the annual catch limits are not exceeded and the rebuilding plan stays on track.
 - If recreational management options to split the gag recreational season are selected, these options should be based on the analysis estimating high gag discard mortality.

- The Council should obtain agreement from state managing agencies to implement consistent regulations, including automatically adopting in-season closures should the projected catch estimates reach or exceed the prescribed catch limit during one or both of the split seasons. This is particularly important for Florida where the bulk of the gag recreational fishery occurs, as they do not currently have this structure in place.
- In Action 2:
 - The Framework Action should include robust data and analysis that evaluates whether the proposed action will in fact reduce gag discards, sufficiently protect gag from overfishing and protect spawning aggregations.
 - The Council should select a new alternative or a modified Alternative 4 as the Preferred Alternative so that the recreational fishing season is closed for all shallow-water grouper beyond 15 fathoms (90 feet) during December through May. At a minimum, waters beyond 20 fathoms (120 feet) should be closed to recreational fishing of all SWG species January through April to protect gag spawning aggregations from exploitation through discard mortality while anglers are fishing for other SWG species.
- The Council should request Scientific and Statistical Committee (SSC) review and analysis on the impact of selected management actions on discard mortality and the gag rebuilding plan before final approval and implementation.

We discuss these concerns in more detail below.

Recreational Data Needs Improvement to Support a Regional Approach

Revising gag recreational seasons to better accommodate anglers in different parts of the Gulf region requires high-quality recreational data that is available to managers in a timely manner. Although this Framework Action is focused on splitting the recreational gag season, in fact this is being done to allow anglers in different regions of Florida a better opportunity to target gag and could be considered de facto regional management. Subdividing recreational catch estimates for any species weakens the statistical rigor of those estimates and creates a higher degree of uncertainty.¹ If the recreational gag fishery is split into distinct seasons (*e.g.* spring/early summer seasons would benefit anglers in northern Florida and late fall/winter seasons would primarily benefit anglers in southern Florida), then the data on which to base in-season management decisions will have a high degree of uncertainty. To adequately support splitting gag recreational fishing opportunities into seasons or regions, statistically rigorous data sampling programs are necessary. **Thus, the Framework Action should explicitly describe whether the MRIP is sufficient to monitor split recreational fishing seasons for gag. This would require that preliminary catch estimates are available to managers in time to ensure the annual catch limit is not exceeded and the rebuilding plan stays on track.**

¹ Marine Recreational Information Program website: <http://www.countmyfish.noaa.gov/index.html>

While the MRIP is undergoing significant improvements², it is not clear that these design and sampling improvements are sufficient to meet these specialized management needs. The Framework Action does not contain any analysis of whether improvements in MRIP estimates can sufficiently accommodate the split-season approach, and this program was not specifically designed for seasonal management.³

Uncertainty in MRIP catch data are estimated using a calculation called the proportional standard error (PSE) and catch estimates with PSE values higher than 50% are considered to be *very imprecise*⁴. For example, the preliminary 2012 data for the two waves when gag was open in the spring in four northern counties in Florida (*i.e.*, “Big Bend mini-season”) have much higher uncertainty (PSE values of 92% and 49%) than the period when gag was open for the rest of the Gulf (PSE = 20%). Further parsing the data without sufficiently increasing sampling programs will greatly increase the uncertainty of catch estimates used to monitor the gag fishery. Higher uncertainty can lead to under or over estimating the actual landings by a significant amount, depending on how high the PSE values are. **This in turn can lead to overages and unnecessarily short seasons.**

Moreover, splitting the recreational fishery into two or more seasons requires obtaining catch estimate data in a timely manner so managers can react in time to exercise in-season closures should projections of catch be near or over the catch limit. It now takes at least 45 days for the preliminary catch estimates to become available. The Council should consider whether data will be available in time for managers to slow down or halt the fishery should the catch estimates come in higher than projected. In particular, the Council should aim to keep any split season in line with the timing of the two-month waves used by MRIP for recreational data collection.

Further subdividing the data without addressing this issue could lead to an inability to effectively monitor catch levels and maintain catch within science-based limits. Potential remedies could include significant increases in MRIP sampling, shortening the timeframe within which the data becomes available to managers, and supplemental and verifiable angler reporting systems (*e.g.*, fish tag program, electronic reporting).

Consideration of Discard Mortality

Fish that are caught and released sometimes suffer a condition known as barotrauma. This is caused by a pressure change when fish caught at depths are suddenly raised to the surface. The sudden change in pressure causes the fish to swell up, often leading to bulging eyes and everted stomachs. This can cause significant internal damage and lead to immediate or delayed mortality. Gag are vulnerable to the effects of barotrauma, particularly in deeper waters.⁵ The stock assessments for gag factor in discard mortality for the recreational fishery based on results

² Marine Recreational Information Program website: <http://www.countmyfish.noaa.gov/index.html>

³ Review of Recreational Fisheries Survey Methods. Committee on the Review of Recreational Fisheries Survey Methods, National Research Council. 2006.

⁴ PSE is a measure of precision and is expressed as a percentage of the standard error of an estimate. <http://www.st.nmfs.noaa.gov/st1/recreational/queries/glossary.html#pse>

⁵ 2002. Evaluation of multiple factors involved in release mortality of undersized red grouper, gag, red snapper, and vermilion snapper. MARFIN Grant No. NA87FF0421.

of scientific research.⁶ Discard mortality rates at shallower depths (30-60 feet) are estimated to be 11% to 18% while at greater depths (90 to 120 feet) the rates increase to 29% to 42%. At depths of 180 feet, more than 60% of released gag die. Thus, increased fishing, particularly at greater depths will impact gag through additional discard mortality.

If management options for split recreational seasons are selected, **we strongly recommend the Council assume that discard mortality of gag will be high** in setting new recreational management. Thus, management options considered should correspond to the analysis that uses high discard mortality estimates.⁷ The reasons for this include:

- Gag are overfished, undergoing overfishing and are in the first year of the 10-year rebuilding plan (Amendment 32). Thus, **it is imperative that the Council not make any decisions that could jeopardize their recovery.**
- Recent increases in the red grouper regulations recreational bag limit and annual catch limit and changes to the accountability measures for all shallow-water grouper could increase fishing effort for these species. Since these fish co-occur with gag at times, it is likely that this could lead to an increase in gag discards.
- If the gag season is no longer open during all or part of the recreational season for red snapper or other popular recreational target species, discards are likely to increase.⁸
- As the gag population moves toward recovery, catch rates can be expected to increase, even during the months when the gag recreational season is not open. The weight of individual gag grouper should also increase, and that may lead to a shorter recreational season, as has happened recently with red snapper. A shorter season would likely result in additional discards.

Data on and analysis of these species interactions and changing management schemes has not been undertaken, but it should be an important factor in the Council's determination of the appropriate management options for gag. Nor has the Council's SSC had an opportunity to examine how these factors might impact the gag rebuilding plan. In the light of this important information and absence of SSC review, **high discard mortality of gag should be assumed and factored into the management options selected** in the Framework Action.

This type of analysis is essential to maintain multiple species fisheries at sustainable levels, and we urge the Council to continue to move toward this more ecosystem-oriented approach to fisheries management.⁹ In addition, **before final action is taken, the Council's SSC should be asked to review this Framework and provide input on how the Council's preferred alternatives will impact the gag grouper rebuilding plan.**

⁶ SEDAR 10. Final model for Gulf of Mexico gag grouper as recommended by the SEDAR Grouper Review Panel: Revised results and projections. Southeast Fishery Science Center, September 5, 2007.

⁷ Tab B – 19, October 2012 Briefing Book.

⁸ Figures 2.9.1 and 2.9.2 in Amendment 30B.

⁹ Report to Congress. The State of Science to Support an Ecosystem Approach to Regional Fishery Management. National Marine Fisheries Service. 2009.

Protecting Spawning Aggregations from Exploitation

Action 2 considers revising or eliminating the February-March shallow-water grouper recreational closure. Removing this seasonal spawning closure could leave known spawning aggregations unprotected and potentially increase exploitation of gag through bycatch mortality when anglers target other SWG species. Some alternatives in Action 1 also allow fishing during times of spawning, thereby leaving these aggregations vulnerable to the directed fishery. If options in Action 1 are pursued, the Council should establish the recreational fishing season in a manner that will avoid further exploitation of gag through discard mortality caused by fishing for other SWG during their spawning seasons, when they could be easy targets for anglers fishing offshore.

The stated purpose for Action 2 in the Framework Action is to *evaluate the continued need for the shallow-water grouper closure*. However, the Public Hearing Draft (PHD) for this Action does not provide sufficient data and analysis to evaluate the effects of eliminating or revising the SWG spawning season closure. Instead, the PHD relies heavily on anecdotal information from one fisherman which is referenced multiple times in the document:

“...anecdotal information suggests that when all shallow-water grouper are closed to harvest, fishermen target other species including mangrove snapper, greater amberjack, and cobia. These species are often caught in areas of high gag abundance.”¹⁰

While we do not dispute the information presented, solely relying on limited information from one particular region to remove the seasonal spawning closure Gulf-wide is problematic. This anecdotal information referenced in the Framework Action regarding species interaction is not substantiated with data or analysis on the entire recreational gag fishery. While the intended effect of Action 2 is to reduce gag discards, it may in fact lead to an increase in gag discards which is not accounted for in the gag rebuilding plan. Therefore, the Framework Action should include data and analysis that adequately evaluates how the proposed action to revise or eliminate the SWG spawning closures in fact reduces gag discards and sufficiently protects gag from overfishing.

Scientific research well documents that gag form large spawning aggregations at known locations from January through April, and February and March are typically the peak of their spawning season.^{11,12} However, pre-spawning aggregations of mature females form in December and January.¹³ While the specific function of these pre-spawning aggregations is not known, they seem to be important staging grounds readying the fish to spawn. Other SWG

¹⁰ Framework Action, pp 18-19.

¹¹ Koenig, CC, F.C. Coleman, L.A. Collins, Y. Sadovy, and P.L. Colin. 1996. Reproduction in gag in the eastern Gulf of Mexico and the consequences of fishing spawning aggregations. In F. Arreguin- Sanchez, J. L. Munro, M. C. Balgos, and D. Pauly (eds.), *Biology, Fisheries and Culture of Tropical Groupers and Snappers*, pp. 307 – 323. ICLARM Conf. Proc. 48.

¹² Coleman, F.C., Koenig, C.C. and L.A. Collins. 1996. Reproductive styles of shallow-water groupers in the eastern Gulf of Mexico and the consequences of fishing spawning aggregations. *Environmental Biology of Fishes* 47(2): 129-141.

¹³ Koenig, C.C. and F.C. Coleman. 2011. Protection of Grouper and Red Snapper Spawning in Shelf-Edge Marine Reserves of the Northeastern Gulf of Mexico: Demographics, Movements, Survival and Spillover Effects. MARFIN Project Final Report. MARFIN project number NA07NMF4330120.

species (e.g., scamp, black grouper) form spawning aggregations during similar times of the year, some at the same depths. Red grouper spawn during the late winter and spring as well but do not form aggregations. See Table 2 below for further details.

Table 2. Spawning seasons for shallow-water groupers¹⁴

Species	Peak Season	Total Season	Minimum Depth
Gag	Feb – Mar	Dec - May	120 ft (20 fathoms)
Red grouper	Mar - May	Feb – mid-July	60 ft (10 fathoms) but does not aggregate
Black grouper	Feb – Apr	Nov - May	90 ft (15 fathoms)
Scamp	Mar – mid-May	Feb - July	120 ft (20 fathoms)
Yellowmouth grouper	Apr - May	Jan - Dec	90 ft (15 fathoms), inferred
Yellowfin grouper	unknown	Mar - Aug	In Middle Grounds (90 ft, inferred)

As background, the shallow-water grouper spawning season closure was originally put in place in 2006 as a 30-day closure (15-Feb to 15-Mar) in order to reduce red grouper mortality when that species was overfished.¹⁵ It was extended to all of February and March through Reef Fish Amendment 30B when gag was determined to be undergoing overfishing. Gag is now also overfished. To fully protect spawning aggregations of vulnerable shallow-water grouper, **we recommend prohibiting recreational harvest of these species beyond 90 feet (15 fathoms) from December through May. At a minimum, fishing for SWG should be prohibited at 120 feet (20 fathoms) during the major portion of the spawning season (January – April) to protect gag pre-spawning and other SWG spawning aggregations.**

This action would require revisions to the language in Alternative 4 or the creation of a new alternative and selecting either as the Preferred Alternative. Impact on the recreational fishery should be minimal as most fishing at that time of the year likely occurs in much shallower water, but it would offer critical protection for vulnerable grouper spawning aggregations. This action would also be consistent with the commercial spawning season closure at “The Edges” implemented as part of Amendment 32. Additionally, maintaining protections for these highly vulnerable spawning aggregations helps to proactively prevent overfishing of species that are currently thought to be healthy.

Conclusion

To successfully implement seasonal and regional management of gag (and other species), the current recreational data collection program needs significant improvement. We urge the Council to ensure that the recreational data collection and estimation program is adequate for managing

¹⁴ Modified from Table 2.1.3 in the Framework Action, last column on depths added.

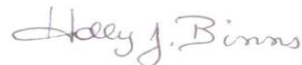
¹⁵ 2005 Regulatory Amendment for Red Grouper.

the gag recreational fishery in separate seasons. If the Council moves forward with this Framework Action, we strongly recommend the Council use the 'high discard mortality estimates' analysis for gag as the basis for selecting preferred alternatives that will impact bycatch mortality. Additionally, the Council should obtain agreement with state management agencies, particularly from Florida, to ensure concurrence with the seasonal management approach. We strongly oppose lifting the shallow water grouper spawning season closure without sufficient data and analysis supporting the belief that this action would achieve the stated intention to reduce gag bycatch and protect gag. Instead, we urge the Council to maintain protections of spawning aggregations, and at a minimum, keep the existing closure in place for waters deeper than 20 fathoms (120 feet) but for January through April. We also strongly encourage the Council to utilize the expertise of its SSC to obtain scientific review and advice on these proposed management changes, and to specifically ensure that the proposed changes will not undermine the rebuilding plan for the depleted gag grouper population. Thank you for the opportunity to provide comments on the gag Framework Action.

Sincerely,



Chad Hanson
Senior Science and Policy Analyst
Gulf of Mexico Fish Conservation Campaign
Pew Environment Group



Holly Binns
Director
Southeast Fish Conservation Campaigns
Pew Environment Group

Subject: Gulf Coast Council hearing Oct 16 Sirata beach resort St.pete Beach

Date: Sunday, October 21, 2012 2:40 PM

From: C21JWHITE@aol.com

To: John Milner <GulfCouncil@gulfcouncil.org>

Conversation: Gulf Coast Council hearing Oct 16 Sirata beach resort St.pete Beach

Hi ,

I attended the meeting on Oct 16th at the Sirata beach Resort St.Petersburg Beach. I was surprised that Gulf Coast council and FWC officials did not show up for the meeting. I spoke at the meeting along with many other private citizens and fisherman & Divers. This does not go over well to the public and casts a bad image of the governing bodies that make the rules. It seems these meetings are not your priority to attend.

You have the recordings of the meeting and I urge you to listen carefully. You are destroying a way of life and many businesses that depend on fishing for gag grouper. I have lived here since 1960 and have been fishing and diving since the early 70's. I dive and fish whenever I can and have seen the gag grouper population rebound since the limit was lowered from 5 fish to 2 fish. There is no need to further reduce the limit to 1 fish. As a result of this rebound I urge you to extend the fishing season at least another month this year until the end of November 2012. I would like it to go through December as well. October, November & December and are the most reliable months for the thousands of small boat fisherman in our state who have a realistic chance to catch grouper. It was mentioned at the meeting that your surveys show that 95% of fisherman only catch 1 gag or fewer fish. That is not true for me but probably since you are not allowing fisherman to fish the most productive months such as November & December this would contribute to that statistic. I also was the person who spoke about having a weekend only fish season for gag year round. this would really help the small business that you are destroying with your regulations. This would close the season down for 70 % of the year not counting all of the bad weather days that always seem to occur over the weekends especially during the winter. I would be OK to close the weekends down during the peak spawning seasons for the gag grouper.

I appreciate you seriously considering what I have said.

Best Regards,

Jim White

Broker/President

CENTURY 21 Jim White & Assoc. Inc.

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No. 1 CENTURY 21 Office in Pinellas county 2008,2009,2010 & 2011

No. 1 office in Tampa Bay 2011

No. 1 CENTURY 21 Office in North & Central Fl 2011

CENTURY 21 President's Award 2009,2010 & 2011

Subject: Gag Grouper 2013/Shallow Water Grouper Closure
Date: Monday, October 15, 2012 8:19 PM
From: Jeff Koepke <jeffkoepke8@gmail.com>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: Gag Grouper 2013/Shallow Water Grouper Closure

Gulf Council,

I would like the council to take the following action regarding the Shallow Water Grouper Closure:

Alternative 3: Complete elimination.

This closure was a travesty on family level grouper fisherman gulf wide. The vast majority of grouper fisherman cannot reach the 20+ fathom curve and never impact spawning grouper. This closure has decimated the recreational charter fleet in Southwest Florida.

As for gags I would like to support alternative 3, option 3b, suboption 3b(ii). June 1- June 30 and November 1 until remainder of the ACT is projected to be caught, one fish bag limit.

Thank you for your time,
Jeff Koepke
Ft. Myers

Subject: Amendment 37 Gag & Triggerfish
Date: Monday, October 15, 2012 8:06 AM
From: Mike & Isabel Graef <capt.mike@cox.net>
To: Info <Info@gulfcouncil.org>
Conversation: Amendment 37 Gag & Triggerfish

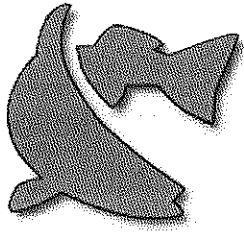
To Gulf Council:

Gag Grouper. I am all for a daily bag limit of 1 fish for Gag Grouper (grouper aggregate limit remains at 4) if in fact it will extend the season. The 2012 season July 1st till Oct 31st (Federal Waters) has been a HUGE success so far and with these dates we are assured our longest possible season. The idea of different seasons will be too confusing for charter/head boat customers. The shallow water fishery (State Waters) should have no effect on Federally permitted vessels!!!!

Grey Trigger Fish. Are not being overfished! Since amendment 30a was put into effect (14" fork length). Yes less Triggers are being KEPT! But were throwing a lot of them back due to the increased size limit no other reason!! Once again the Gulf council has been quick to shut down a species before all the facts are in! You closed Trigger on June 11th this year in an emergency measure but during your data collection the hooks to used are too BIG to catch a Trigger! 10 Trigger bag limit is overkill I would like to see a 5 fish daily bag limit with no closed season! We have had to many changes to Snapper, Gag, Greater Amberjack and now Trigger seasons over the last 3 years we need management to keep season opening and closure dates changes to a minimum!!!

Thank You,

Capt. Mike Graef
Charter Boat Huntress
Destin, Fl. 32541
850-685-5593



CCA Florida

Dedicated to conserving and protecting Florida's marine resources

October 11, 2012

The Honorable Commissioners
of the Florida Fish and Wildlife
Conservation Commission
620 South Meridian Street
Tallahassee, FL 32399

Re: Gulf of Mexico Gag Grouper Management

Honorable Commissioners:

We understand that the Gulf of Mexico Fishery Management Council has asked for the input of the Commission on the management of gag grouper in the Gulf. We view this as a long overdue concession in light of the vast majority of gags being landed from the Gulf of Mexico waters are landed on Florida shores, and an effective way to avoid any inconsistency between state and federal regulations. We would like to share with you our views on the ongoing management of gags in the Gulf.

Perhaps the biggest issue we have had with the management of gags to date (as well as certain other species) has been the lack of an allocation between sectors that is not only fair but also provides the greatest benefit to our state and the nation. All analyses of the relative economic impacts of the recreational and commercial sectors for gags have overwhelmingly shown the greatest impact to come from the recreational sector. We reject as patently unfair the idea that those who exploit a public resource for profit should be able to do so while the public realizes not even a reasonable season or reasonable size or bag limits. We thus urge the Commission to recommend that the Gulf Council promptly re-allocate the allowable catch of gag grouper fairly and to allow for the greatest benefit to our state and our nation before the 2013 management regulations are put in place.

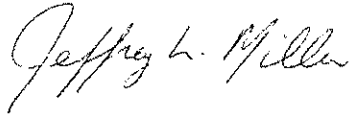
A second problem that exists with the commercial take of gags in the Gulf is the lack of protection of the stock during its spawning aggregations. Like a number of animals, gags are known to be "harem breeders", meaning that a single dominant male attends to a number of females. These large males tend to be the most aggressive feeders during the spawning aggregations and often caught very early in the spawn, which leaves the spawning potential of the stock well below what it would be if no directed effort were permitted for the commercial sector during the spawn, as is the case with the recreational sector.

We also view the new release devices, such as the SeaQualizer, and techniques that have recently come to light as effective ways to reduce release mortality from the "baro-trauma" that often results in fish caught in deeper waters. The Gulf Council should immediately review the studies that have shown the effectiveness of these new devices and techniques and should permit their use unless concerns that we have not seen are shown to exist.

In terms of a bag limit and the open season for the recreational take of gags, CCA Florida urges the longest possible season and strongly advocates in favor of a no less than a 2 fish bag limit. Because reducing the bag limit to 1 fish will not significantly lengthen the season, we would very much like to see the bag limit stay at 2 fish. Although the split season proposals that we have seen would not provide as long an open season as the single season proposals that we have seen, we recognize that a split season may provide the greatest benefit to the most Floridians and our visitors and we are not opposed to a split season that includes equal summer and winter subseasons with the maximum number of allowable days.

We very much appreciate your service on the Commission and our relationship with you is very important to us. We hope that you will consider these comments in the spirit intended and that you will please contact us to discuss any questions or comments.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jeffrey L. Miller".

Jeff Miller
Chairman
CCA Florida

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
6/12/2012 9:47:37	Charles Domson	cldomson@hotmail.com	I really am not concerned about when the closed season is for recreational anglers. My complaint is that even when its closed for rec, the commercial fisherman continue to fish under the excuse of "bycatch". I believe that the entire grouper fishery, deep and shallow/red and gag/rec and comm, should be shut down during breeding season. Period. And if gag grouper is truly overfished and undergoing overfishing as your data shows, then shut down the gag fishery completely, for both rec and COMMERCIAL fisherman until it recovers. Your policies towards the commercial sector closures make no sense and appear politically or financially motivated Its quite sad really. Charles Domson MD	Palm Harbor, FL 34683	Private Recreational Angler
6/14/2012 7:55:27	Jason Descant	reel.irie@gmail.com	The total number of fishing days should not be reduced no matter the season. The split season would allow Gags to be targeted closer in the cooler months. A reduced bag limit or increased size limit which would allow more days to fish, would be my preference. I would rather fish multiple days and be able to keep one fish then be discouraged to fish at all because I can not keep any fish. For example if you give me 30 days to fish I can maybe (if I am lucky) fish two of those days.	Clearwater	Private Recreational Angler
6/15/2012 10:56:31	Michael H. Colby	captmike50@hotmail.com	Within this framework action I would probably prefer Alt 3 (3b) and Alt 2 (2c). I am not sure if current numbers would support either.	Clearwater, FL 33756	Private Recreational Angler, Charter/Headboat For-Hire
6/15/2012 11:49:52	JOHN LAUBENTHAL MD	jlaubmd@juno.com	Please reconsider the current plan of 'staggered' seasons. It's ridiculous to go spend hundreds of dollars to go fishing & be forced to throw back ~90% of what you catch (Gags, AJs, Triggers, etc). Currently everyone is so excited to be able to go catch 2 ARS p.p. (& maybe some Red Grouper), but basically everything else is closed. Do us a favor (& tell NMFS to 'shove it') & manage our resource for the good of fish & FISHERMEN. Most of us would rather have all the 'bottom fishes' open for ~3 months & then shut it all down. We'll hunt Cobia in the Spring & Troll in the fall (& fish inshore for Trout & Reds all winter). The current system could not be any worse (unless you outlaw fishing altogether)	Panama City Beach	Private Recreational Angler
6/18/2012 4:28:17	Thomas Robinson	thm53@comcast.net	I would like to commend the council for considering this proposal. Your action on this matter of a 2 month ban on red and gag grouper, if you allow us to fish for the red grouper, will certainly allow the gag a reprieve. I have fished out of Naples for 35 years and I know the fishery well. Please heed the local outcry on this important issue.	Naples,Fl, 34102	Charter/Headboat For-Hire
6/19/2012 5:01:57	Capt. Mike Lucas	captmlucas@yahoo.com	The February- March closure for groupers at the peak of our winter season really hurts our charterboat business in southwest Florida .	Naples, Fl. 34104	Charter/Headboat For-Hire
6/19/2012 5:04:36	Christopher Boggs	crboggs@bellsouth.net	I hope to be in the market for a boat this year, but with all the short seasons and outright closures I am wondering if its even worth the investment. Gas prices and weather already make it difficult to reliably get offshore to the deep water species... why bother buying a boat if I can only keep a finite amount of fish during a finite period of time? We can't keep grouper for most of the year. We can't keep snapper for most of the year? Now triggerfish closures? All that's going to be left is the pelagic species that largely require trolling efforts...which can make them cost prohibitive...	Tampa FL 33626	Private Recreational Angler
6/27/2012 13:31:20	DONALD MARSEE	dmarsee@yahoo.com	I think the 20 fathom rule would work and that also would let them spawn.	Temple Terrace,Fl. 33617	Private Recreational Angler

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
8/2/2012 11:59:05	Thomas Pruitt	tw.pruitt@verizon.net	<p>Per the request above this Comments section on this web page....I am 61 years of age, once a licensed charter Cap....fished the waters of Florida's east, west coasts, and the Florida Keys since 1964. I fish the west central Gulf coast, off shore, about twice a week, during the better weather months.</p> <p>My comment to you :</p> <p>Considering the proposed open seasons for gag grouper... I believe that...even though great consideration should be given to the needs of the recreational anglers, as mentioned in your proposal....the first priority should go to the rebuilding of the gag stock.</p> <p>I love to fish for grouper...I would not fish the offshore Gulf, when grouper are closed, were it not for mangrove snapper. That said ... I believe that for the next 3-4 years, and perhaps longer if necessary...grouper should be closed on the month's of November, December, January and February. All months that bring the grouper in closer, and all the while that Gag's are spawning should be closed, until the stock has recovered. Red grouper during the open months should have a four fish bag limit as compensation....they are in no short supply!</p> <p>I have a hard time making this recommendation to you....seeing that I will probably be too old and shaky to get out on the Gulf before the stock has recovered enough to change the open seasons that would enable us to catch the gags closer in, and catch enough to make the trip worth it. But..so be it ! I have two sons and grandsons I need to worry about.</p> <p>Thank you for receiving my comment, and best regards.</p> <p>Thomas.W. (Bill) Pruitt</p>	Wesley Chapel, Fl. 33544	Private Recreational Angler
8/29/2012 9:17:35	George S. Velkey	gulfangler@aol.com	<p>My sincere concern is that for years we senior citizens, retiree's and vetrans have enjoyed the grouper season in the inshore waters of the Florida Panhandle during the cooler months of the year. However this year, the season was shifted to occur in the hottest part of the year. I for one, am a senior, retiree and vetran whose health cannot tolerate the heat associated with fishing during hottest months of the year. I am certain that I an not alone in this concern. Those of us seniors, retirees and vetrans that share in the physical intolerances would Sincerely Appreciate the inclusion of cooler months in the 2013 grouper season. Perhaps consider a dual season where seniors can opt to fish during the cooler months inlue of the hotter months.</p> <p>Sincerely Yours,</p> <p>Older Fisherman</p> <p>George Velkey</p>	Panama City Florida	Private Recreational Angler

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
9/5/2012 9:46:57	George S. Velkey	gulfangler@aol.com	For years we senior citizens have enjoyed fishing for Gag Grouper during the cooler months of the year on the shallow waters of the Florida Panhandle. We Seniors have Health problems dealing with the heat during the hotter months of the year. We would sincerely appreciate if you would consider including some cooler months like, November and December in the 2013 season. Thanks, Senior Panhandle Fishermem	Panama City Florida 32404	Private Recreational Angler
10/5/2012 5:14:55	Chris Sales	piinthesigmasky@gmail.com	A significant consideration in setting grouper season and limits should be bycatch impact on red snapper. This definitely needs to be considered to ensure the red snapper resource is not negatively impacted during grouper season as well as wasting a prized resource during outings. In the last 2 years I have traveled from Michigan for 3 trips consisting of a total of 7 fishing days. During these grouper outings, outside of the red snapper season, 7-14# red snappers are being caught in grouper areas. After a deepwater fight, and even after taking the time to properly rejuvenate the fish, these fish are not recovering. They are returned to the ocean and sometimes they slowly recover, but more often the fish simply floats belly up after a few tries to recover, or sometimes a dolphin feeds on it. I must emphasize, I prize this resource and am putting more than 10 minutes into recovering these fish. I highly recommend a mixed bag limit be created with concurrent seasons for grouper and red snapper, like is done for gag grouper with other grouper species. For example, how about a mixed bag of up to 5 fish, where 2 could be red snapper. This seems to be the consistent number of large fish caught on these outings where recovery is an issue. By the same token this will conserve grouper as snapper keeps displace grouper from the catch. Similarly, it could be 4 fish with 1 red snapper. Interestingly, I do not observe the same issue with smaller red snapper, so you could even go as far as to set a size limit, say 20" minimum on what is kept, where recovery seems to be a challenge beyond that length. Thank you for your consideration of my comments.		Private Recreational Angler
10/13/2012 12:15:54	Randall Graham	jrgcpa@nettally.com	How does the Council know how many fish recreational anglers catch? How has the Council addressed the long-standing practice of commercial fishermen selling their catch in ways that by-pass the trip-ticket methodology of record keeping? Does the Gulf Council take trips and/or receive ANY other benefit, be it tangible or intangible, from commercial fishing interests? If so, how and where are these benefits disclosed Does the Gulf Council recognize that the "appearance" of a lack of independence is just as significant as an "actual" lack of independence?	Tallahassee, FL, 32312	Other
10/14/2012 11:22:08	John Grelles	tylinn@verizon.net	It seems to me that lowering th Gag grouper limit is another way to bring hardship to another select group of people in Florida (fishing guides and recreational fisherman.) This action will affect our Florida economy in a negative manner. Thank You, John Grelles (recreational fisherman)	Palmetto, Fl. 34221	Private Recreational Angler

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
10/15/2012 14:53:17	Capt Bill Walsh	Dawnpatrolmarco@cs.com	<p>Thanks for the opportunity to provide input. Never got notice of Naples meeting until this morning. As VP of Marco Island Charter Capt Assn was at meeting in Tampa last year with Capt Fred Lifton, Member of Reef Advisory Comm where we had agreement of Comm at adjournment that SWFL would have last half of Dec and month of Jan for gags to coincide with gag presence here and our "season". Agreement never made it to reality. So our input this time around in order of priority is</p> <ol style="list-style-type: none"> 1. Move grouper shallow water restrictions to beyond 15 fathoms. 2. Provide SWFL with open season as prior agreement 15Dec to 31Jan 3. Reduce harvest to one gag grouper in an aggregate of three per day. <p>This is a very important issue here. Snook stays closed for big fish inshore and closed grouper during our season leaves us with mangrove snapper ??? as primary target. Again, thanks to the council for listening. Sorry I couldn't make the Naples session.</p> <p>Captain Bill Walsh</p>	Marco Island, FL 34145	Charter/Headboat For-Hire

Subject: <no subject>

Date: Sunday, May 6, 2012 11:02 AM

From: Robert Savona <rsavona1@embarqmail.com>

To: John Milner <GulfCouncil@gulfcouncil.org>

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

I believe the February/March closure rational for all grouper was for the protection of spawning gags. The assumed premise must be that by allowing red grouper fishing that spawning gags would be caught. Another aspect of the premise must have been, that the mortality rate for those accidentally caught and properly released spawning gags, would undermine the gag rebuilding plan.

However, I believe

1. Gags spawn offshore in depths of 150 feet. Whereas the Naples/Ft. Myers full day charter trips, which I and my club members take, are limited by time to water depths of around 50-80 feet.
2. The closure has caused us to fish primarily for snapper both yellowtail and mangrove but primarily mangrove. Mangroves occur on a bottom with more structure e.g. natural breaks or ledges and wrecks. Unfortunately these are the spots where gags occur. If reds were open we would be fishing open bottom (flat rock with solution holes) where gags are infrequently caught.

Consequently, if I am correct it would seem that the closure rational for red grouper recreational fishing doesn't correlate with the majority of the actual recreational fishing activity.

I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely
Robert Savona

Subject: "Open Red Grouper"
Date: Sunday, May 6, 2012 10:40 AM
From: John Kimmins <j.kimmins@att.net>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: "Open Red Grouper"

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

I believe the February/March closure rational for all grouper was for the protection of spawning gags. The assumed premise must be that by allowing red grouper fishing that spawning gags would be caught. Another aspect of the premise must have been, that the mortality rate for those accidentally caught and properly released spawning gags, would undermine the gag rebuilding plan.

However, I believe

1. Gags spawn offshore in depths of 150 feet. Whereas the Naples/Ft. Myers full day charter trips, which I and my club members take, are limited by time to water depths of around 50-80 feet.

2. The closure has caused us to fish primarily for snapper both yellowtail and mangrove but primarily mangrove. Mangroves occur on a bottom with more structure e.g. natural breaks or ledges and wrecks. Unfortunately these are the spots where gags occur. If reds were open we would be fishing open bottom (flat rock with solution holes) where gags are infrequently caught.

Consequently, if I am correct it would seem that the closure rational for red grouper recreational fishing doesn't correlate with the majority of the actual recreational fishing activity.

I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely,

John G. Kimmins
10291 Cape Roman Rd
Bonita Springs, FL 34135

Subject: 2013 Red Grouper Season
Date: Sunday, May 6, 2012 12:02 PM
From: johnpaster@comcast.net
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: 2013 Red Grouper Season

Dear Council members:

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the current February and March closure for red grouper.

It seems the February/March closure rationale for all grouper was for the protection of spawning gags. The assumed premise must be that, by dis-allowing red grouper fishing, that spawning gags would be caught and reproduction stifled. Another aspect of the premise must have been, that the mortality rate for those gags accidently caught and properly released would undermine the gag rebuilding plan.

However, I understand:

1. Gags spawn offshore in depths of 150 feet or greater. Whereas the Naples/Ft. Myers full day charter trips, in which my club members and I participate, are limited by time and distance to water depths of around 50-80 feet.
2. The closure has caused us to fish primarily for snapper - both yellowtail and mangrove - but primarily mangrove. Mangroves occur on a bottom with more structure e.g. natural breaks or ledges and wrecks. Unfortunately these are the spots where gags also occur. If reds were open we would be fishing open bottom (flat rock with solution holes) where gags are infrequently caught.
3. Our actual experiences in recreational fishing, specifically for red grouper during the January and April open months, indicates that very few gags are caught. By selecting the right structure, charter captains are astute at targeting red grouper while avoiding gags. On a recent April 27 trip, six club members caught their limit of red grouper, while releasing many under-sized fish. During that 10-hour trip at a maximum depth of 80 feet, only one gag was caught and released.

Consequently, if this information and experiences are valid, it would seem that the closure rationale for red grouper (recreational fishing) should be revisited by Council members.

In light of this information, I will be interested to hear what ruling the Council will have for red grouper during the 2013 season .

Sincerely,

Jack Paster

Subject: Open Red Grouper
Date: Sunday, May 6, 2012 11:42 AM
From: Jim Holmes <jholmes@holmesltd.com>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: Open Red Grouper

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, FL. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

I believe the February/March closure rational for all grouper was for the protection of spawning gags. The assumed premise must be that by allowing red grouper fishing that spawning gags would be caught. Another aspect of the premise must have been, that the mortality rate for those accidentally caught and properly released spawning gags, would undermine the gag rebuilding plan.

However, I believe

1. Gags spawn offshore in depths of 150 feet. Whereas the Naples/Ft. Myers full day charter trips, which I and my club members take, are limited by time to water depths of around 50-80 feet.
2. The closure has caused us to fish primarily for snapper both yellowtail and mangrove but primarily mangrove. Mangroves occur on a bottom with more structure e.g. natural breaks or ledges and wrecks. Unfortunately these are the spots where gags occur. If reds were open we would be fishing open bottom (flat rock with solution holes) where gags are infrequently caught.

Consequently, if I am correct it would seem that the closure rational for red grouper recreational fishing doesn't correlate with the majority of the actual recreational fishing activity.

I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely,

Jim Holmes
23112 Tree Crest Ct
Bonita Springs, FL 34135
239.498.8780

Subject: Open Red Grouper
Date: Sunday, May 6, 2012 2:51 PM
From: GPLJW@aol.com
To: John Milner <GulfCouncil@gulfcouncil.org>
Cc: <bar2jr@embarqmail.com>, <johnpaster@comcast.net>
Conversation: Open Red Grouper

LAWRENCE J. WINSTON
9301 INDIGO ISLE COURT UNIT 202
BONITA SPRINGS, FL 34135

May 5, 2012

Dear Council Member,

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

I believe the February/March closure rational for all grouper was for the protection of spawning gags. The assumed premise must be that by allowing red grouper fishing that spawning gags would be caught. Another aspect of the premise must have been, that the mortality rate for those accidentally caught and properly released spawning gags, would undermine the gag rebuilding plan.

However, I believe

1. Gags spawn offshore in depths of 150 feet. Whereas the Naples/Ft. Myers full day charter trips, which I and my club members take, are limited by time to water depths of around 50-80 feet.
2. The closure has caused us to fish primarily for snapper both yellowtail and mangrove but primarily mangrove. Mangroves occur on a bottom with more structure e.g. natural breaks or ledges and wrecks. Unfortunately these are the spots where gags occur. If reds were open we would be fishing open bottom (flat rock with solution holes) where gags are infrequently caught.

Consequently, if I am correct it would seem that the closure rational for red grouper recreational fishing doesn't correlate with the majority of the actual recreational fishing activity.

I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely,
(s) Lawrence J. Winston

Subject: Open Red Grouper

Date: Sunday, May 6, 2012 2:53 PM

From: john/lynn martin <martinel@embarqmail.com>

To: John Milner <GulfCouncil@gulfcouncil.org>

Conversation: Open Red Grouper

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Florida. I am requesting the council to reevaluate the reasons for the February and March red grouper closure.

I believe the Feb/Mar closure rational for all grouper was for the protection of spawning gags. The assumed premise must be that by allowing red grouper fishing that spawning gags would be caught. Another aspect of the premise must have been, that the mortality rate for these accidentally caught and properly released spawning gags, would undermine the gag rebuilding plan.

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solution holes) where gags are infrequently caught.

Consequently, if I'm correct it would seem that the closure rational for red grouper recreational fishing doesn't correlate with the majority of the actual recreational fishing activity.

I would be interested to hear what objections the council would have to allowing the Feb/Mar harvest of red grouper.

Sincerely,

John L. Martin

Subject: Open Red Grouper
Date: Sunday, May 6, 2012 4:24 PM
From: richard heberle <ricardoson@aol.com>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: Open Red Grouper

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

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I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely,

Dick Heberle

Subject: Open Red Grouper
Date: Monday, May 7, 2012 8:59 AM
From: John J Petronio <johnpetronio@hotmail.com>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: Open Red Grouper

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

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I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely,

John J. Petronio

Subject: Red Grouper Season
Date: Sunday, May 6, 2012 11:31 AM
From: Gary frazier <gfrazier98@comcast.net>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: Red Grouper Season

Dear Sirs,

I am one of one hundred thirty five members of the Brooks Fishing Club of Bonita Springs, Fl. I am requesting the Council to reevaluate the reasons for the February and March red grouper closure.

I believe the February/March closure rational for all grouper was for the protection of spawning gags. The assumed premise must be that by allowing red grouper fishing that spawning gags would be caught. Another aspect of the premise must have been, that the mortality rate for those accidentally caught and properly released spawning gags, would undermine the gag rebuilding plan.

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I would be interested to hear what objections the Council would have to allowing the February through March harvest of red grouper.

Sincerely,

Gary J . Frazier
816-509-3711