



April 27, 2020

Mr. Frank Helies
Southeast Regional Office
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, FL 33701

Dear Mr. Helies:

We appreciate the opportunity to comment on the proposed rule to implement Amendment 29 to the Snapper Grouper Fishery of the South Atlantic Fishery Region (NOAA-NMFS-2020-0008). We strongly support this rule to modify fishing gear requirements to promote best fishing practices in the region and urge the National Marine Fisheries Service (NMFS) to approve and implement the regulations as quickly as possible.

A major component of this rule is the requirement for descending devices to be rigged and ready for use on all boats targeting snapper grouper, with the intent of the Council being that the devices should be used when signs of barotrauma are present. Our organizations have a long history of supporting strong conservation measures that improve the survivability of caught-and-released fish. In addition to good stewardship of our important natural resources, reducing discard mortality is responsible fisheries management. Requiring descending devices, coupled with the use of non-stainless hooks (and non-offset circle hooks north of 28° N latitude), will help accomplish this goal in the snapper grouper fishery.

We have greatly appreciated the efforts of the South Atlantic Fishery Management Council to address discard mortality in this important fishery and applaud these requirements. Because of the potential positive impact of these regulations, we request that NMFS proceed without delay in approving NOAA-NMFS-2020-0008, recognizing the agency's concern about "providing sufficient time to comply with the requirements." Over the last several years, extensive outreach has already been done by the Council and our associations promoting the use of descending devices. We stand ready to continue that effort and work in concert with the Council and NMFS to ensure anglers are able to readily comply with the requirement.

Thank you for your consideration of our comments.

Sincerely,

Glenn Hughes, President
American Sportfishing Association

Jeff Crane, President
Congressional Sportsmen's Foundation

Chris Edmonston, VP Government Affairs
BoatU.S.

Guy Harvey, President
Guy Harvey Ocean Foundation

Jeff Angers, President
Center for Sportfishing Policy

Jason Schratwieser, President
International Game Fish Association

Patrick Murray, President
Coastal Conservation Association

Frank Hugelmeier, President
National Marine Manufacturers Association

cc: Secretary of Commerce Wilbur L. Ross
Assistant Administrator for NOAA Fisheries Chris Oliver