



June 25, 2012

Attention: Gulf Management Council

We are Darden, the world's largest full service restaurant company. We own and operate over 1,900 restaurants with seven brands in North America being: Red Lobster, Olive Garden, LongHorn Steakhouse, The Capital Grille, Season's 52, Bahama Breeze and Eddie V's. We serve over 400 million meals a year, employ over 180,000 people and our sales are approximately \$8 billion a year.

Seafood is on every one of our restaurant menus. It is in our best interests, both from a core value perspective as well as a business perspective, that seafood is harvested in a sustainable manner for today and for future generations. For our company to thrive, we need a steady and reliable supply of top-quality fish and shellfish to serve to our guests. We also have a responsibility to do our part to maintain healthy and productive ocean ecosystems. To that end, we were a founding member of the Global Aquaculture Alliance, an organization that sets sustainable standards for best aquaculture practices. We are also conducting a fisheries improvement project in the Gulf of Mexico which will improve the data collection and management of the snapper and grouper fisheries. We helped establish the Atlantic Lobster Sustainability Foundation, a nonprofit organization with the goal to preserve and enhance a viable sustainable lobster industry. And, those are just a few of our initiatives.

We respect and appreciate the great efforts of NOAA and the Gulf Management Council in establishing the catch share program for the US Gulf of Mexico. The catch share program has shown to eliminate overfishing and achieve annual catch limits, improve fishermen's safety and profits, and reduces the negative biological and economic effects of regulated fisheries that don't use catch share programs.

While we support the catch share program we believe there are areas within the structure of the quota allocation that, if amended, would provide the fishery with more equitable allocation of quota. A more equitable allocation of quota would accomplish three goals:

- Support an essential catch share program goal of encouraging fisherman to own a share of the fishery and, therefore, be more responsible in the management of the resource
- Remove the ability of the quota holders to manipulate market pricing by restricting or loosening quota
- Build an architecture that will be economically viable to future fishermen so that fishing in the Gulf can be a consideration as a future career choice



We believe the most appropriate way to achieve these objectives is to allocate catch share quota only to fisherman fishing the quota. Quota should not be owned or sold by absentee owners neither should quota be attached to a vessel. By enacting this consideration, the catch share program will provide more consistent fishing standards, a more stable market, and more predictable and manageable costs for the consumer. The individuals fishing the quota will be incentivized to be more responsible for the sustainability of the resource and provide younger generations the hope and ability to own quota and fish the US Gulf of Mexico as a career.

We also recommend for consideration a review of the Gulf of Mexico recreational sector quota. This sector is allocated a very large portion of the red snapper quota, almost equal to that of the commercial sector; however, they do not have the reporting requirements that the commercial sector does. Additionally, some stocks in the Gulf of Mexico, including red snapper, are not on target to be rebuilt in 10 years, as is mandated by the Magnuson-Stevens Act. Calling for improved data collection and monitoring from recreational fishers and shorter rebuilding plans within 10 years could lead to clear benefits to the resources.

We suggest that these two proposals for consideration are essential elements of a sustainable fishery.

Thank you for your consideration in addressing this amendment to the current catch share quota allocation process.

Sincerely,

Roger A. Bing
Vice President
Seafood Purchasing

paj





SOUTHEASTERN FISHERIES ASSOCIATION, INC.

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ROBERT P. JONES, Executive Director
Phone (850) 224-0612
Fax (850) 222-3663
E MAIL: Bobfish@aol.com

Mount Vernon Square
1118-B Thomasville Road
Tallahassee, Florida 32303-6287
WEBSITE: www.southeasternfish.org

June 25, 2012

Mr. Bob Gill, Chairman
Gulf of Mexico Fishery Management Council
2203 North Lois Avenue
Tampa, Florida 33607

Dear Mr. Chairman:

Southeastern Fisheries Association (SFA) respectfully requests the Gulf of Mexico Fishery Management Council to examine all aspects of the letter from a national anglers lobbying group, signed by a Mr. Brewer, pertaining to reallocation of the nation's fish. We intend to submit an equitable reallocation plan for our sector and the nation's millions of non-boaters, who depend on professional fishermen, licensed and accountable under all requisite state and federal regulations, for their share of sustainable, wild harvested domestic seafood products.

SFA trusts all members of all Councils will adhere to and abide by the federal fishery law they are obligated and paid to uphold. The reasons for passing the Magnuson-Stevens Fishery Conservation Management Act (FCMA) are easily understood by reading Sec. 2 (a) (1) of the act, which clearly, concisely and correctly states food supply to the Nation is number one and providing recreational opportunities follows. Nowhere in the History of the act, or in the words of the law, is there any authority giving the majority of our nation's seafood supply to anglers. I can assure you, as an active participant in the development and passage of the Magnuson Act, Senator Warren Magnuson and Senator Ted Stevens did not create this all-encompassing public policy for anglers. Heed the words of FCMA, not verses or phrases recently written by revisionists who are not well informed on the full history of FCMA.

SFA and a host of other professional associations have established a working relationship with some of the angler groups, who do not have the goal of banning all professional fishing. We will continue to pursue this with any group willing to work for equity.

The FCMA was conceived and created to remove foreign fishing mostly in New England, stop Russia from harvesting US salmon and to provide a steady supply of seafood to the citizens of this country and provide recreational opportunities as shown by the following.

FCMA SEC. 2. FINDINGS, PURPOSES, AND POLICY 16 U.S.C. 1801

(a) FINDINGS.--The Congress finds and declares the following:

(1) The fish off the coasts of the United States, the highly migratory species of the high seas, the species which dwell on or in the Continental Shelf appertaining to the United States, and the anadromous species which spawn in United States rivers or estuaries, constitute valuable and renewable natural

Mr. Bob Gill – page 2

resources. **These fishery resources contribute to the food supply, economy, and health of the Nation and provide recreational opportunities.**

It's been suggested one militant angler group has the votes pledged from members of the Gulf of Mexico Council and South Atlantic Council to reallocate most of the consumer's fish to their pleasure fishing sector through sheer political power. If any Council member allows any user group to commandeer increased allocations of fish from the non-boating consumer's allocation by improper or unethical political machinations, they should be replaced for not complying with the covenants of federal law.

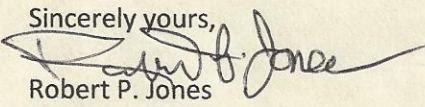
Before any discussion occurs turning this reallocation conflict into "FISHGATE", we suggest the Council create charts and graphs of fish harvested by user group/species from 1976 to 2012. Additionally, the Council should prepare a two-page report showing what user group gets the fish today and how disproportionate it is in many fisheries. Send this information to all interested parties for comments and suggestions. Show the general public exactly what percentage and pounds of fish the consumers get and what percentage the anglers get at the present time.

Several angler and environmental groups have demonized the commercial fishermen for decades painting "commercial" fishermen in an ugly light. In the future we request the allocation pageant refer to us as CONSUMERS/COMMERCIAL FISHERMEN.

Our historical seafood industry is composed of fish dealers, fishermen, processors, boat builders, trucking companies, seafood restaurants, shore side maintenance facilities, box manufacturers, public and private cold storage freezers and the list goes on and on. Our industry urges the Council not to be bullied into carrying out the policy and goals of any group. The fish belong to all the people in America, not just those who belong to anointed angler or environmental groups.

Thank you for considering our views. We respectfully ask that every Council member work in a manner giving everyone due process and the rule of law prevail in all final decisions.

Sincerely yours,


Robert P. Jones
Executive Director

PS: Please forward our remarks to same mailing list as the letter from Mr. Brewer

> From: "Administrator" <administrator@joincca.org>

> Subject: Red snapper/grouper economic summary

> Date: June 20, 2012 8:38:04 AM CDT

> To:

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> June 20, 2012

>

>

> Mr. Robert Gill, Chair

> Gulf of Mexico Fishery Management Council

> 2203 N Lois Avenue

> Suite 1100

> Tampa, Florida 33607 USA

>

>

> Dear Chairman Gill,

>

> I am writing on behalf of the Coastal Conservation Association and our 75,000 members in the Gulf states. As the Council begins formal consideration of re-allocation grouper and red snapper, we urge the Council to look objectively towards maximizing the benefits generated for the entire nation by these valuable marine resources. To this end, we have produced the attached summary of 19 studies on the relative valuation of Gulf grouper and red snapper resources that comprise the best available economic science on this allocation issue.

>

> We trust that you and the other Council members will find this guide helpful in your deliberations. It is telling that in each of these studies by private, academic and government scientists the results clearly support increasing the recreational allocation. CCA has long supported the use of objective economic data to support creating allocations that will work for the future of these fisheries rather than merely reflecting the past history. We will continue to work constructively with the Council to seek the best possible outcome on this issue for the economy of the Gulf states and this nation.

>

> Thank you for your consideration of our views and this important data.

>

> Sincerely,

>

>

> Chester Brewer, Chairman

> CCA National Government Relations Committee

>

>

Subj: **Who Gets The Fish?**
 Date: 12/27/2011 2:45:15 P.M. Eastern Standard Time
 From: bobfish@aol.com
 To: bobfish@aol.com

RF 28
ALLOCATION OF FINFISH IN THE GULF OF MEXICO UNDER FISHERY MANAGEMENT PLANS MANDATED BY THE MAGNUSON ACT OF 1976 AND AMENDED IN 2006.

The environmental community, especially Pew Trusts, Environmental Defense Fund and the Ocean Conservancy have targeted commercial fishermen as the cause of all ills in the ocean environment. From the fisherman's perspective, these groups, and fishing organizations they have formed and fund, perpetuate their goal of removing as many commercial fishermen from the oceans as possible. Fish stocks managed in the United States federal waters are not undergoing overfishing according to the National Marine Fisheries Service.

There is nothing the fishermen can do to stop environmental groups from saying anything they wish to accomplish their goal of reducing fishermen, but the fishermen can and should provide facts to the general public for their perusal instead of just believing what the anti-commercial fishing groups espouse.

There are several angler groups masterfully using misinformation to force government fishery managers to fear them politically and then allocate most of the fish to them. How nice it would be to sit together with a few non-confrontational environmental leaders to discuss the total lack of stock assessments in the southeast and the great need for improvement of science used to manage our lives. That is a goal them might be too far away to achieve, but we are willing to come half-way.

Examine the table below. If you find an error please call it to my attention. The figures are from government sources, primarily fishery management plans in place for FEDERAL waters of the Gulf of Mexico.

<u>SPECIES</u>	<u>ANGLER ALLOCATION</u>	<u>COMMERCIAL ALLOCATION (fish made available to consumers)</u>
BLUE MARLIN	100%	0%
WHITE MARLIN	100%	0%
SAILFISH	100%	0%
REDFISH	100%	0%
AMBERJACK	73%	27%
KING MACKEREL	70%	30%*
GAG GROUPER	65%	35%
RED SNAPPER	49%	51%
RED GROUPER	24%	74%

FLORIDA STATE WATER FISH ALLOCATIONS

BILLFISH	100%	0%
SNOOK	100%	0%
REDFISH	100%	0%
TROUT	98%	2%

* Not sure of king mackerel because it's managed jointly, but this was the approximate split in the Gulf of Mexico in the past.

Bob Jones
 Southeastern Fisheries Association Inc.
 1118-B Thomasville Road
 Tallahassee, Florida 32303
Bobfish@aol.com
<http://www.seafoodsustainability.us>

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Coastal Conservation Association

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June 15, 2012

Mr. Robert Gill, Chair
Gulf of Mexico Fishery Management Council
2203 N Lois Avenue
Suite 1100
Tampa, Florida 33607 USA

Dear Chairman Gill,

I am writing on behalf of the Coastal Conservation Association and our 75,000 members in the Gulf states. As the Council begins formal consideration of re-allocation grouper and red snapper, we urge the Council to look objectively towards maximizing the benefits generated for the entire nation by these valuable marine resources. To this end, we have produced the attached summary of 19 studies on the relative valuation of Gulf grouper and red snapper resources that comprise the best available economic science on this allocation issue.

We trust that you and the other Council members will find this guide helpful in your deliberations. It is telling that in each of these studies by private, academic and government scientists the results clearly support increasing the recreational allocation. CCA has long supported the use of objective economic data to support creating allocations that will work for the future of these fisheries rather than merely reflecting the past history. We will continue to work constructively with the Council to seek the best possible outcome on this issue for the economy of the Gulf states and this nation.

Thank you for your consideration of our views and this important data.

Sincerely,

Chester Brewer, Chairman
CCA National Government Relations Committee

cc:

Mr. Douglass Boyd, Vice Chair
Gulf of Mexico Fishery Management Council

Mr. Steve Bortone, Executive Director
Gulf of Mexico Fishery Management Council

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The Economic Evaluation of Grouper Allocations presented by Mr. Agar and Mr. Carter at the Corpus Christie council meeting was totally the wrong way to determine the value of commercial grouper. Fishermen pay from \$.50 to \$.60 a pound for red grouper allocation in order to catch that pound of fish. How can they use that as the value of a pound of red grouper when the consumer is willing to pay \$25.00 for a grouper dinner and only get a half of a pound on their plate.

Using the price of IFQ *shares* is a more realistic method than using allocation prices. Red snapper shares are selling for \$35.00 a pound. Shares are what a fisherman strives to acquire because they give him the privilege to catch that fish every year. Even though the council's Principles of Allocation states that economic allocation should not be the *sole purpose* of allocation, the economic evaluation of a commercial fish to a recreational fish should at least be accurate.

Section b. 1. of the council's Principles for Allocation states, "Suggested methods for determining reallocation should be *accountability* (a sector's ability to keep within allocation)."

By continuously overrunning their quota over the years, the recreational sector has effectively already reallocated more fish to themselves, to the detriment of the commercial sector and more importantly, to the fish stocks and the American consumer.

Powerful recreational groups want to take fish away from the commercial sector. They are hiding behind the pretence that everything has to revolve around economics and money. Whether the recreational angler population is growing or not, we live in a world of limits. The Gulf Council sets the harvest limits and each sector should abide by those limits.

What about American citizens who can't afford boats, and depend on the commercial fishery to eat healthy seafood. *Food has always been more important than playing.* Why should fish be taken away from the working fisherman who is trying to feed his family and the American consumer and awarded to an elite group of people who have money and time to spare?

If this Council chooses to reallocate; don't take fish away from one sector and give them to the other. Let each sector *earn* its share of fish. Keep the allocation split between each sector *just as it is now*, and each year thereafter whichever sector exceeds their quota should have a payback provision to make them accountable. It is not just about fishermen, be it recreational or commercial; it is also about the American consumer. After all, Magnuson Stevenson advocates the maximum benefit to the nation, not just to people who can afford pleasure boats.

Jim Clements
Commercial fisherman
Carrabelle Fl.

The Case for Grouper and Snapper Re-Allocation

A recent presentation to the socioeconomic science and statistical committee (SESSC) of the Gulf of Mexico Fishery Management Council by two NOAA Fisheries Service Economists showed that recreational value for grouper far outstrips commercial value in the grouper fishery. These economists concluded that the current allocation is economically inefficient and to increase efficiency and maximize the value to the nation, the allocation should be moved towards the recreational sector. Yet the SESSC refused to recommend changing the allocation substantially or even recommending that the council should develop a plan to change allocations in this fishery. This prompted CCA to compile all the grouper and red snapper valuation estimates published in the literature and provided in Table 1. The estimates presented to the SESSC are detailed in NMFS 2011 and Carter and Liese (2012).

Table 1. All Existing Grouper and Red Snapper Values.

Authors	Year	Species	Commercial Value	Recreational Value	Supports Re-Allocation to Recreational Sector
Haab, T.C. et al.	2000	Snapper - Grouper		\$7 - \$8/fish	Yes
Gentner, B.	2004	Red Grouper		\$19.37/pound	Yes
Gentner, B.	2004	Gag Grouper		\$19.27/pound	Yes
Johnston et al.	2006	All Fish Species		14.33/fish	Yes
Carter, D.W. et al.	2008	Grouper (all)	\$1.14/pound	\$1.33/pound	Yes
Haab, T. et al.	2009	Grouper (all)		\$32 - \$98/fish	Yes
Gentner, B.	2010	Gag Grouper		\$13.58/pound	Yes
Gentner, B.	2010	Red Grouper		\$13.51/pound	Yes
NMFS	2011a	Gag Grouper	\$0.95/pound		Yes
NMFS	2011a	Red Grouper	\$0.69/pound		Yes
NMFS	2011a	Deepwater Grouper	\$1.09/pound		Yes
NMFS	2011a	Shallowwater Grouper	\$0.97/pound		Yes
Carter, D.W. and C. Liese	2012	Grouper (all)		\$26-\$80/fish	Yes
Gillig et al.	2000	Red Snapper		\$20/fish	Yes
Gillig et al.	2003	Red Snapper		\$7/fish	Yes
Haab, T. et al.	2009	Red Snapper		\$108/fish	Yes
Griffin et al.	2009	Red Snapper		\$52-\$155/day	Yes
Carter, D.W. and C. Liese	2012	Red Snapper		\$20-\$63/fish	Yes
NMFS	2011b	Red Snapper	\$2.76/pound		Yes

From Table 1, commercial values for various grouper species range from \$0.69/pound to \$1.14 per pound with the lower values from NMFS 2011a being more accurate as they are from market transactions in the grouper quota lease market whereas the Carter et al. (2008) estimates are derived from an econometric model. Commercial values for red snapper were \$2.76/pound as taken from quota lease transactions in NMFS 2011b. Recreational values range from a conservative \$1.33/pound to \$19.37/pound for grouper. Several of the studies did not denominate the value by the pound and instead denominated the value per fish. In these cases, value per fish ranged from \$7/fish to \$98/fish for grouper and from \$7/fish to \$108/fish for red snapper. To address detractors that have problems with the MRFSS data, the Johnston et al. study compiled 391 estimates across 48 different studies using all varieties of recreational data to develop the average across all fish species of \$14.33/fish. Using the 2011 MRIP catch estimates, the average gag grouper weighs 7.14 pounds. Applying this estimate to the Johnston figure generates a value per pound in the \$2/pound range for grouper supporting re-allocation when taking the average value across all species found in the literature. Griffin et al. (2009) simulated a market for red snapper shares and in this simulation the recreational sector would purchase the entire commercial allocation.

The evidence is overwhelming. Across all studies that have examined commercial and recreational value, recreational value exceeds commercial value. All studies consistently show that the current allocation is inefficient and that efficiency would be increased if recreational allocations were increased. Isn't it about time that the council addresses this inefficiency and begins managing these fisheries to maximize their value to the nation?

References

- Carter, D.W., J.J. Agar, and J.R. Waters. 2008. Economic Framework for Fishery Allocation Decisions with an Application to Gulf of Mexico Red Grouper. U.S. Department of Commerce. NOAA Tech Memo. NMFS-SEFSC-576.
- Carter, D.W. and C. Liese. (2012). The Economic Value of Catching and Keeping or Releasing Saltwater Sportfish in the Southeast USA. North American Journal of Fisheries Management. 45pp. In Press.
- Gentner, B. 2010. Allocation Analysis of the Gulf of Mexico Gag and Red Grouper Fisheries. Report prepared for the Coastal Conservation Association. 27pp. Available from the author.
- Gentner, B. 2004. Examining Target Species Substitution in the Face of Changing Recreational Fishing Policies. In: What are Responsible Fisheries? Proceedings of the Twelfth Biennial Conference of the International Institute of Fisheries Economics and Trade. Yoshiaki Matsuda and Tadashi Yamamoto eds. July 20-30, 2004. Tokyo, Japan.
- Gillig, D., T. Ozuna Jr., and W. L. Griffin. 2000. The value of the Gulf of Mexico recreational 536 red snapper fishery. Marine Resource Economics 15:127-139. 537

Gillig, D., R. T. Woodward, T. Ozuna, and W. L. Griffin. 2003. Joint estimation of revealed and stated preference data: An application to recreational red snapper valuation. *Agricultural and Resource Economics Review* 32:209-221.

Griffin, W.L., R.T. Woodward and H.N. Kim. 2009. Supplementary Technical Document to the Final Report: Bioeconomic Analysis of the Red Snapper Rebuilding Plan and Transferable Rights Policies in the Gulf of Mexico. Grant ending report, grant number NA17EF2873. 249pp.

Haab, T., Hicks, R., Schnier, K., and Whitehead, J. 2008. Angler Heterogeneity and the Species-Specific Demand for Recreational Fishing in the Southeast United States. Final Report Marine Fisheries Initiative (MARFIN) Grant #NA06NMF4330055. December 29, 2008.

Haab, T., Whitehead, J. and T. McConnell. 2000. *The economic value of marine recreational fishing in the Southeast United States: 1997 Southeast economic data analysis*. Final Report for NMFS Contract No. 40WCNF802079.

Johnston, R.J., M.H. Ranson, E.Y. Besedin, and E.C. Helm. 2006. What determines willingness to pay per fish? A meta-analysis of recreational fishing values. *Marine Resource Economics* 21:1-32.

NMFS. 2011a. 2010 Gulf of Mexico Grouper-Tilefish Individual Fishing Quota Annual Report. SERO-LAPP-2011-10. 35pp.

NMFS. 2011b. Gulf of Mexico 2010 Red Snapper Individual Fishing Quota Annual Report. SERO-LAPP-2011-09. 35pp.

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
6/18/2012 5:47:35	Clarence Fleck	flecknique@live.com	<p>As a charterboat during the total grouper closure of February and March we fish for snapper which are on the same type of terrain as Gag grouper therefore it increases the risk of mortality to the Gag grouper that we release. A different approach might be to allow Red grouper to be open all year with a limit of two per person due to the fact that Red grouper live on a different terrain the Gag Grouper. This would provide a more viable option for both the Gag grouper and the fishing community as a whole.</p> <p>Thank you for your time.</p>	Naples, FL 34120	Charter/Headboat For-Hire

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
6/18/2012 5:47:35	Clarence Fleck	flecknique@live.com	<p>As a charterboat during the total grouper closure of February and March we fish for snapper which are on the same type of terrain as Gag grouper therefore it increases the risk of mortality to the Gag grouper that we release. A different approach might be to allow Red grouper to be open all year with a limit of two per person due to the fact that Red grouper live on a different terrain the Gag Grouper. This would provide a more viable option for both the Gag grouper and the fishing community as a whole.</p> <p>Thank you for your time.</p>	Naples, FL 34120	Charter/Headboat For-Hire
6/21/2012 1:41:14	Paul Alagna	beach_trade@yahoo.com	<p>The red grouper allocation should be altered to allow recreational anglers 5 fish per person per day. There is too much emphasis by the council focused on making sure commercial fisherman are making enough money at the expense of recreational bag limits and closures.</p> <p>There should be no commercial fishing allowed for any species that is considered overfished and recreational fisherman should be given priority over commercials in regards to allocation amounts. There should be no commercial fishing for gag at all if gag is going to continue to have closed rec seasons and ridiculously low limits.</p> <p>All of the recreational fisherman I know are sick and tired of getting the short end of the stick by the council while the commercial fisherman are being given priority</p> <p>Red grouper should be 76% recreational and 24% commercial..</p>	Palm Harbor, Florida 34683	Private Recreational Angler