Subject: No Sector Separation.
Date: Tuesday, April 16, 2013 12:59 PM
From: chuck weddel <cweddel@hotmail.com>
To: John Milner <GulfCouncil@gulfcouncil.org>, Pamella Dana <fish@surelurecharters.com>, Juan Sanchez <john@blaylockoil.com>, Larry Abele <labele@fsu.edu>, <rshipp@jaguar1.usouthal.edu>, John Greene <fishorangebeach@gmail.com>, Kay Williams <hkaywilliams@hotmail.com>, Corky Perret <corkyperret@bellsouth.net>, Harlon Pearce <nolrah@aol.com>, Campo Matens <cematens@yahoo.com>, Douglass Boyd <douglassboyd@yahoo.com>, Martha Bademan <martha.bademan@MyFWC.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, Dale Diaz <dale.diaz@dmr.ms.gov>, Myron Fischer <mfischer@wlf.la.gov>, <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, Denny Fishing Rights Alliance <fra@tampabay.rr.com>
Conversation: No Sector Separation.

Dear Gulf Council members-

I fish, I vote and I have been ignored by this Council's majority, as has an overwhelming majority of my peers. One more time, for the record.... Rescind the 30B provision of 'pre-emption'. States regulate state waters. Period.

What part of no sector separation did you not hear? To the Council members who supported 'days at sea' - I am disgusted to even have to comment on this again, and am taking this to Congress. I will also be actively involved in contacting my Governor about those who ignore the public while collecting almost $500 per day in taxpayer money, and will support litigation against this by the FRA.

As for the sad display of agenda during the Rec Data Advisory Panel- What were you thinking? Why was a commercial Council member running a PURELY RECREATIONAL panel? Why did he lead off, and finish up with, the HMS style permit?

I have no confidence that you will read this or even care, but here goes:

The TRUE SOLUTION to the recreational data problem is to

1-Define the universe of participants (anglers)

2- Randomly survey statistically significant numbers of anglers

3- Random distribution of catch and landings data collection surveys

Also, why do you plan meetings that conflict with state fisheries meetings? Who is responsible for this?

To the minority of Council members who seem to listen - THANK YOU for your efforts. To the rest - I'm taking my disgust of your actions to Congress. And I will be demanding ACCOUNTABILITY and an investigation into the Council's 'process'.

Charles M Weddel

5008 W Linebaugh Avenue Ste 35

Tampa, FL 33624

813-961-2600

Subject: No Sector Separation
Date: Monday, April 15, 2013 11:39 PM
From: WSHAK@aol.com
To: John Milner <GulfCouncil@gulfcouncil.org>, Pamella Dana <fish@surelurecharters.com>, Juan Sanchez <john@blaylockoil.com>, Larry Abele <labele@fsu.edu>, <rshipp@jaguar1.usouthal.edu>, John Greene <fishorangebeach@gmail.com>, Kay Williams <hkaywilliams@hotmail.com>, Corky Perret <corkyperret@bellsouth.net>, Harlon Pearce <nolrah@aol.com>, Campo Matens <cematens@yahoo.com>, Douglass Boyd <douglassboyd@yahoo.com>, Martha Bademan <martha.bademan@MyFWC.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, Dale Diaz <dale.diaz@dmr.ms.gov>, Myron Fischer <mfischer@wlf.la.gov>, <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, <fra@tampabay.rr.com>
Conversation: No Sector Separation

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William Shackelford

415 Irongate Drive

Macon, Georgia 31220

Subject: Gulf Council - Concerns
Date: Monday, April 15, 2013 10:10 PM
From: Ray Farmer <ray.b.farmer@gmail.com>
To: John Milner <GulfCouncil@gulfcouncil.org>, Pamella Dana <fish@surelurecharters.com>, Juan Sanchez <john@blaylockoil.com>, Larry Abele <labele@fsu.edu>, <rshipp@jaguar1.usouthal.edu>, John Greene <fishorangebeach@gmail.com>, Kay Williams <hkaywilliams@hotmail.com>, Corky Perret <corkyperret@bellsouth.net>, Harlon Pearce <nolrah@aol.com>, Campo Matens <cematens@yahoo.com>, Douglass Boyd <douglassboyd@yahoo.com>, Martha Bademan <martha.bademan@MyFWC.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, Dale Diaz <dale.diaz@dmr.ms.gov>, Myron Fischer <mfischer@wlf.la.gov>, <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, <fra@tampabay.rr.com>
Conversation: Gulf Council - Concerns

Dear Gulf Council members,

As a recreational fisher, I feel the need to re-express some concerns that I have regarding the direction this council is taking with regards to the 'days at sea' program.

What part of no sector separation did you not hear? To the Council members who supported 'days at sea' - I am disgusted to even have to comment on this again, and am taking this to Congress. I will also be actively involved in contacting my Governor about those who ignore the public while collecting almost $500 per day in taxpayer money, and will support litigation against this by the FRA.

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I, along with the vast majority of my fishing peers, believe there is only one true solution to the recreational data problem:

Define the universe of participants (anglers)
Randomly survey a statistically significant numbers of anglers
Random distribution of catch and landings data collection surveys

To the minority of Council members who seem to listen - THANK YOU for your efforts. To the rest - I'm taking my disgust of your actions to Congress. And I will be demanding ACCOUNTABILITY and an investigation into the Council's 'process'.

Hoping this reaches the right ears,

Ray Farmer
Tampa, FL

Subject: Gulf Council
Date: Monday, April 15, 2013 7:48 PM
From: Brad Grant <bgrant_12002@yahoo.com>
Reply-To: "Brad Grant" <bgrant_12002@yahoo.com>
To: John Milner <GulfCouncil@gulfcouncil.org>, Pamella Dana <fish@surelurecharters.com>, Juan Sanchez <john@blaylockoil.com>, Larry Abele <labele@fsu.edu>, <rshipp@jaguar1.usouthal.edu>, John Greene <fishorangebeach@gmail.com>, Kay Williams <hkaywilliams@hotmail.com>, Corky Perret <corkyperret@bellsouth.net>, Harlon Pearce <nolrah@aol.com>, Campo Matens <cematens@yahoo.com>, Douglass Boyd <douglassboyd@yahoo.com>, Martha Bademan <martha.bademan@MyFWC.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, Dale Diaz <dale.diaz@dmr.ms.gov>, Myron Fischer <mfischer@wlf.la.gov>, <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, <fra@tampabay.rr.com>
Conversation: Gulf Council

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Brad Grant
Crystal River FL

Subject: Concerns & Answers
Date: Monday, April 15, 2013 7:22 PM
From: Debbie Barlow <shoalriv@cox.net>
To: John Milner <GulfCouncil@gulfcouncil.org>, Pamella Dana <fish@surelurecharters.com>, Juan Sanchez <john@blaylockoil.com>, Larry Abele <labele@fsu.edu>, <rshipp@jaguar1.usouthal.edu>, John Greene <fishorangebeach@gmail.com>, Kay Williams <hkaywilliams@hotmail.com>, Corky Perret <corkyperret@bellsouth.net>, Harlon Pearce <nolrah@aol.com>, Campo Matens <cematens@yahoo.com>, Douglass Boyd <douglassboyd@yahoo.com>, Martha Bademan <martha.bademan@MyFWC.com>, Kevin Anson <Kevin.Anson@dcnr.alabama.gov>, Dale Diaz <dale.diaz@dmr.ms.gov>, Myron Fischer <mfischer@wlf.la.gov>, <rpausina@wlf.louisiana.gov>, Robin Riechers <robin.riechers@tpwd.state.tx.us>, Denny O'Hern <fra@tampabay.rr.com>
Conversation: Concerns & Answers

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Regards,

Debbie Barlow

Coastal Conservation Association
Comments for Scoping Hearing on
Proposed Days-at-Sea Pilot Program for Charter-for-Hire

CCA has examined the scoping document and concluded that this effort is yet another attempt to explore separation of the private boat recreational and charter industries. Such separation carries no benefit for either sector. We do not understand why the Council believes it might be necessary to have different rules for kids who ride their bicycles to the candy store and those who ride a taxi there. The Council needs to stop responding in a knee jerk and unpredictable fashion to the continued complaints of the few and stay on track to solve the problems that face the many: the private boat angling sector.

We also would point out that the scoping document incorrectly states that while the cap on new charter permits requested by that industry has held those numbers relatively steady the private boat sector continues to increase effort. This is not the case as is evidenced by the MRIP records of Gulf of Mexico EEZ effort between 2000 and 2012 shown in the table below.

Estimate Status	Year	Angler Trips	PSE
FINAL	2000	1,656,029	3.1
FINAL	2001	1,880,118	2.9
FINAL	2002	1,812,427	2.7
FINAL	2003	1,982,285	3
FINAL	2004	2,598,647	6.2
FINAL	2005	1,868,931	7.6
FINAL	2006	1,873,577	6.9
FINAL	2007	1,857,968	6.3
FINAL	2008	1,761,743	6.8
FINAL	2009	1,331,717	6.9
FINAL	2010	996,759	9.2
FINAL	2011	1,083,656	6.5
PRELIMINARY	2012	1,378,310	6.5

The primary objection that CCA has with sector separation is the lack of any apparent benefit to be had at any level for recreational anglers, the states, or for state budgets. There continue to be vague references to better data but there is no new way to track catches on for-hire vessels. If the sectors were separated today, the same data gathering systems (the Marine Recreational Fishery Statistical Survey or the new Marine Recreation Information Program) would continue to provide catch estimates for private and for-hire sport vessels. Any new data collection efforts could be implemented without separating the sector.

Economically, NOAA has funded bio-economic studies that show that for the period 2009 to 2032, recreational anglers will contribute $9.1 billion of the value in the Gulf of Mexico shrimp

and reef fish fisheries while the recreational for-hire fishery will contribute $0.83 billion. We hope that the Council will factor in these figures when considering sector separation.

Other economic figures should also be examined in this debate. The NOAA Fisheries Service Office of Science and Technology looked at Economic Impacts and Expenditures from Saltwater Sportfishing by Gulf State in 2009. That information indicates that here in Texas, angler expenditures came to almost $103 million while for-hire expenditures totaled about $27 million. Gulf-wide, angler expenditures came to over $1 billion. For-hire expenditures came to about $208 million.

For state governments and their marine resource management agencies, private boat anglers supply the vast majority of license fees that support state fisheries programs. Charter/for-hire vessels supply a much smaller percentage of revenues. From a political standpoint, we suspect sector separation will create deep political conflicts for state governments as they grapple with how to spread fishing opportunities between private boat and charter/for-hire/headboat sectors.

Looming over all these points is the trend over the past decade towards increased red snapper catch by the private vessel sector relative to for-hire catches. We do not know why this trend has occurred but do not believe the Council should impose government action to reverse what has occurred naturally. We also do not think the Council should impose government action to support the increasing private vessel catch trend. We believe these dynamic changes should occur without artificial influence by managers, and without the outdated encumbrance of sector allocations that are set in stone.

Before this Council lets the concept of sector separation - under any guise- come into existence against almost universal opposition, CCA encourages it to first reallocate fisheries according to modern factors like economic, social and conservation criteria, rather than outdated catch history. There is a very good chance that reallocating red snapper would solve many of the problems faced by the CFH sector without creating so many new problems.

This Council faces many real management challenges, and CCA appreciates the demands of those challenges on its time and resources. We hope that the Council will elect to focus its energies on those core issues and set aside the distraction of sector separation.

THE PEW CHARITABLE TRUSTS

April 8, 2013

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

RE: Charter "Days at Sea" Pilot, Headboat Electronic Reporting, Regional Management and Private Recreational Data Collection

Dear Mr. Boyd:

Please consider these comments on behalf of The Pew Charitable Trusts on a number of issues before the Gulf of Mexico Fishery Management Council (Council) at the April 2013 meeting.

1) We support moving forward with the charter "days-at-sea" pilot but have some recommendations to help improve the design and effectiveness of that program.
2) Similarly, we recommend approval of the framework action to require weekly electronic reporting from headboat vessels but urge that electronic reporting be accompanied by strong validation methods to ensure data is not just more timely but also accurate.
3) As regional management under Amendment 39 is pursued, we urge the Council to keep rebuilding of the red snapper population as the top priority and to ensure that management strategies are designed to keep catch from exceeding the prescribed scientific limits, which includes strong accountability measures.
4) For the private recreational fishery, we encourage Council action on the motions made from the *Ad Hoc* Private Recreational Data Collection Advisory Panel.

More detailed recommendations are included below.

Charter "Days at Sea" Pilot Program

Pew supports investigating new ways to manage recreational fisheries that allow for more fishing opportunities while keeping the catch within science-based limits. We support the continued development of the charter pilot program as a means to test a new management strategy that could help prevent overfishing and also allow charter fishermen to operate their businesses in a more flexible and efficient manner. However, this pilot should be designed around clear and specific objectives aimed at more effectively implementing catch limits.

The most important components of this pilot are ensuring that electronic catch data is sufficiently validated and fishing activity is effectively monitored. We have some suggestions to address this:

- An electronic data-collection system and an effective way to validate the data should be in place before charter operators start the pilot. That will require advance coordination with state fisheries agencies on enforcement and dockside sampling, as well as secured funding to operate the project.
- We also recommend coordinating with the Marine Recreational Information Program on their pilot using electronic self-reported for charter boats. The report for their pilot should be available for the April meeting and could be instructive.
- Increased sampling through the MRIP dockside survey or additional monitoring outside of the MRIP will be necessary to properly validate catch and trip information for the Gulf Council's pilot. This might not be covered under existing MRIP sampling protocols, and would likely require additional funds and resources. We recommend coordinating with MRIP to determine the sampling protocols and level of coverage needed to ensure charter boat catch in this pilot is sufficiently monitored.

Additionally, we have some specific comments on the scoping document:

- The Council should add an alternative that considers allotting pounds or numbers of fish to individual vessels as a unit of effort in addition to the days, trips, and angler trips in the document now. That could be the simplest approach, and individual vessels could be held accountable to stay within their allotted pounds (or numbers) of red snapper. This would be the most direct way to ensure that quotas are not exceeded.
- The Council should also accompany the allotment of the recreational ACL used for this pilot with accountability measures specific to the project. For example, if the pilot exceeds its catch limit, then measures such as overage paybacks and fishing reductions should be applied directly to the participants in this pilot. If sufficient monitoring and validation occur in real time, those measures may not necessarily be triggered. But it would provide an appropriate assurance that this pilot program will not negatively affect other recreational anglers.
- Finally, we urge the Council to rename the proposed pilot to include a broader description of its purpose, instead of one aspect of it. For some, "Days at Sea" carries negative connotations because of a failed plan by that name in New England. One suggestion: re-name it "Charter Sector Pilot."

In summary, we support moving the charter pilot to the next step with the inclusion of clear and specific conservation objectives focused on better implementing catch limits in addition to the socio-economic goals that have been identified. The most important components to get right in order for the pilot to be successful are ensuring that electronically reported data is sufficiently validated, and the catch is effectively monitored. That will likely require additional resources and infrastructure, which should be secured and in place before the project starts.

Headboat Electronic Reporting

We applaud and encourage the Gulf and South Atlantic Councils for their effort to move from paper to electronic reporting and logbooks. Electronic data should enable more timely catch monitoring and improve the adherence to catch limits that prevent overfishing. In Action 1 of the Draft Framework Action document (Framework Action), **we support the Council's Preferred Alternative 4, would require headboat vessels to submit electronic fishing records to the Science and Research Director (SRD) at weekly or shorter intervals**.

Unfortunately, the South Atlantic Council selected a reporting interval of 21 days as its preferred alternative. The intent in developing electronic reporting requirements for headboat vessels is to coordinate with both councils since headboat reporting is conducted through one program for both regions. However, requiring data to be reported within three weeks of headboat trips is only a marginal improvement over the status quo of monthly reporting. The purpose and need from the Framework Action document states:

> *The purpose of this amendment is to modify the data reporting requirements for federally permitted headboat vessels in the Gulf of Mexico to ensure effort, landings, and discard information of managed fish stocks are recorded accurately* ***and in a timely manner****. The need for this amendment is* ***to prevent overfishing and ensure ACLs are not exceeded***[1] [emphasis added].

Thus, the primary purported benefit of obtaining near real-time data for ACL implementation by requiring electronic reporting is lost if reporting is required in only three week intervals. We urge the Council to support Preferred Alternative 4 which requires weekly reporting or intervals less than a week if required by the SRD and to encourage the South Atlantic Council to adopt this same requirement.

We'd also like to point out that self-reported electronic data systems, including logbooks, do not necessarily mean higher quality data and effective prevention of overfishing unless it is paired with adequate validation. For example, estimates produced by self-reported electronic data can be much different than estimates produced from observer data. This is illustrated by the graph below comparing commercial red snapper discard estimates from both observers and self-reported logbooks (see Figure 1).

[1] Framework Action to the Fishery Management Plans for Reef Fish Resources of the Gulf of Mexico and Coastal Pelagic Resources of the Gulf of Mexico and South Atlantic Headboat Electronic Reporting Requirements. January 27, 2013. Tab E., No. 3, Gulf Council February 2013 briefing book, pg. 7.

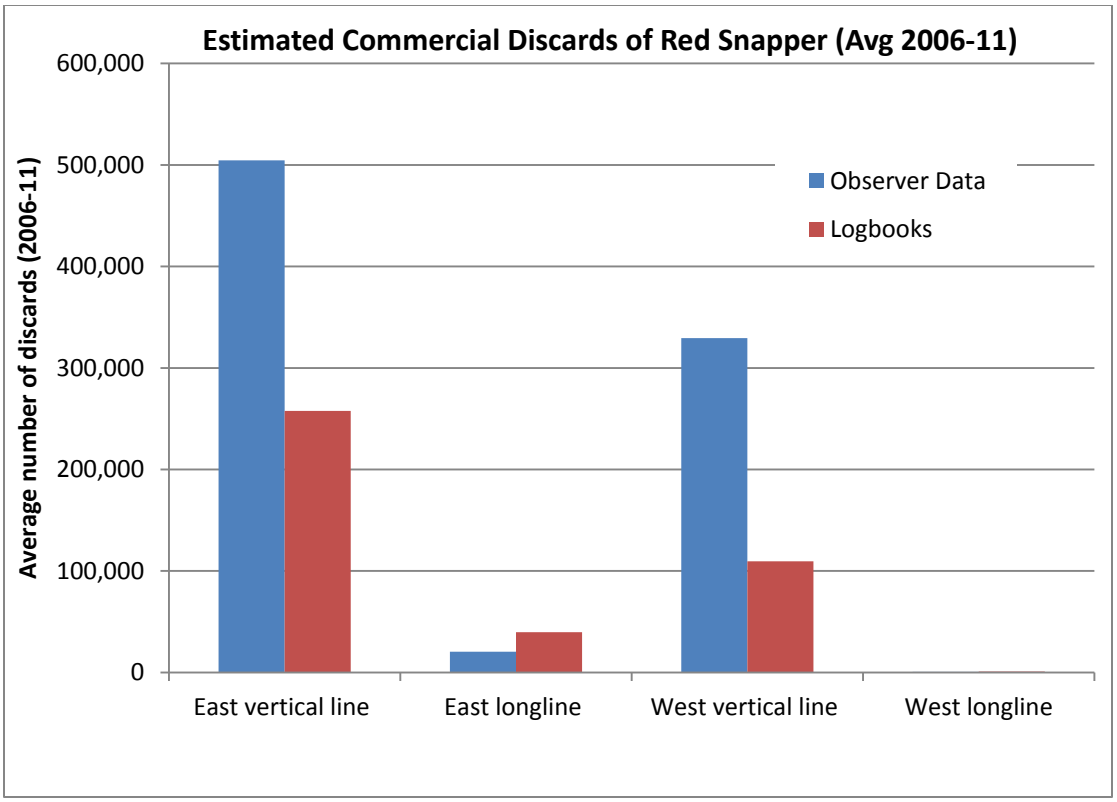

Figure 1. Comparison of commercial discards of red snapper. The blue bars are fishery-wide estimates based on observer data whereas the red bars are fishery-wide estimates based electronic logbook reports as reported *(i.e.*, unfiltered). This is shown as an example of the disparity sometimes seen in self-reported data. Relying solely on self-reported data with inadequate validation may not provide accurate data. Similar data from the headboat fishery is not readily available. [Data from SEDAR31-AW31[2]]

The Framework Action[3] for headboat electronic logbooks does not describe how the data will be improved or how it will be validated. This document should require measures to ensure that the electronic logbooks provide higher quality data, not just more timely data. Specifically, the framework document should include:

- targeted levels of compliance with reporting,
- a description of required validation methods to be utilized, including both observer coverage and dockside sampling, and
- a description of how any disparities in the electronic logbook data will be handled.

Additionally, since 1996, the Magnuson Stevens Fishery Conservation and Management Act (MSA) has required fishery management plans (FMP) to include a standardized bycatch reporting methodology (SBRM) to assess the amount and type of bycatch occurring in the fishery. Specifically, each FMP must:

[2] McCarthy, K. 2012. Calculated red snapper discards in the Gulf of Mexico commercial vertical line and bottom longline fisheries. SEDAR31-DW31. 13pp.
[3] The updated document for the April 2013 Council meeting was not available at the time of this writing.

" . . . establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery, and include conservation and management measures that, to the extent practicable and in the following priority – (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided;"[4]

Unfortunately 17 years after this legal mandate was enacted, an effective catch monitoring and reporting system capable of providing reliable estimates of bycatch and discards in the Gulf of Mexico is still lacking. Establishment of an adequate standardized bycatch and discard reporting methodology is critical to effective ACL management and accountability and must be a top priority of the Council. This Framework Action should specifically describe how requiring electronic logbooks complies with the SBRM requirements and will improve bycatch monitoring.

In summary, actions proposed in this Framework Action have the potential to improve catch monitoring and reporting considerably if the appropriate alternatives are selected. Thus, the Council should move forward expeditiously with this Framework Action to require weekly electronic reporting from headboat vessels. However, electronic reporting must be accompanied by strong validation to ensure the data is both more timely and more accurate in order to facilitate more effective implementation of ACL requirements. Additionally, the Framework Action should describe how requiring electronic data will improve bycatch monitoring and how it complies with standardized bycatch reporting methodology requirements.

Amendment 39 – Red Snapper Recreational Regional Management

As the Council considers regional management strategies for the recreational red snapper fishery, it is critical to conserve and protect this public resource. We urge you to keep the rebuilding plan's progress as your priority by ensuring that any management actions adopted are designed to keep the recreational fishery within catch limits prescribed by the scientific process and required by the Magnuson-Stevens Act. In particular, accountability measures, including in-season monitoring and payback provisions, are key to preventing overfishing by making sure the annual catch limit is not exceeded.

Since 2007, the recreational sector has exceeded the Gulf red snapper ACL on average by more than a million pounds a year, with the exception of 2010 when the Deepwater Horizon oil spill resulted in large scale fishing closures. A regional management approach that maintains the status quo for data collection and monitoring will likely lead to greater uncertainty in the data used to track catch and could result in even higher overages of the annual catch limit. Since the recreational red snapper fishery is currently monitored on a Gulf-wide basis, catch estimates of red snapper produced from the MRIP have relatively low associated uncertainty (<0.15 PSE, or proportional standard error[5]). If this same monitoring program is used to track red snapper catches across the states without increased sampling, the uncertainty within most states would increase above 0.25 PSE[6] in many cases, and well above this level in some cases. The higher the

[4] 16 U.S.C. § 1853(a)(11).
[5] Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division. http://www.st.nmfs.noaa.gov/recreational-fisheries/access-data/run-a-data-query/queries/index
[6] A PSE level of 0.25 and greater should be viewed "with increasing caution", Ibid.

uncertainty (*i.e.*, PSE) in the catch data, the more likely estimates are further from actual catch which could lead unwittingly to risky management decisions and higher overages across the Gulf. In other words, states may choose less restrictive regulations based on highly imprecise data and the Gulf-wide ACL could be greatly exceeded when all the state landings are combined.

To counter this effect, states would need to implement increased or supplemental data collection and monitoring programs to better track catch of red snapper by state or regions. This may include tools for improved catch accounting such as fish tags, offshore fishing permits or mandatory catch reporting that can be sufficiently validated. A regional management approach would also require states to become more directly involved in analyzing data from the red snapper recreational fishery to ensure catch in waters off of their coasts stay within the prescribed catch limits. Currently, NOAA Fisheries provides much of the data and analysis for ACL implementation and fisheries regulations.

Additionally, the Council should implement strong accountability measures such as the use of an annual catch target to build in a margin of error associated with the level of uncertainty in the data monitoring programs. These AMs should also be coupled with state-based in-season closure authority to prevent exceeding the ACLs and overage paybacks when the ACLs are exceeded.

Ideally, regional management would be a coordinated effort among the states across the region with improved data collection and fisheries monitoring programs and measures to keep all states within their science-based catch limit. However, new data programs likely require significant new funding resources. This is a serious concern in this era of constrained budgets at both the state and federal level. [7]

Private Recreational Data Collection Advisory Panel Recommendations

The Council's Ad Hoc Private Recreational Data Collection Advisory Panel (AP) recommended at its March 2013 meeting means to better track offshore fishermen and their catch, which in turn would provide valuable data for stock assessments and improve the effectiveness of the ACL / AM approach. Presently, managers do not know how many of the 3 million or so licensed saltwater anglers in the Gulf of Mexico fish offshore for federally managed species. However, less than 10% of the recreational trips occur in federal waters.[8] MRIP obtains catch information from all saltwater trips regardless of area fished. Since the bulk of recreational fishing trips occur in coastal waters, the bulk of the sampling occurs on those state-based fisheries (*e.g.*, red drum, spotted seatrout). Increasing knowledge of the potential universe of offshore anglers Gulf-wide through some type of permitting system could provide data managers and scientists with a more defined group of anglers from which to generate more reliable catch and effort statistics for federal fisheries.

[7] Appendix B. Analysis on cost of improving harvest information. Scoping Document for Amendment 39. Dec. 31, 2012, Tab SP, No. 6(a), briefing book for Special Reef Fish Committee meeting, January 2013.
[8] Ibid, MRIP query page. http://www.st.nmfs.noaa.gov/recreational-fisheries/access-data/run-a-data-query/queries/index April 1, 2013.

Thus, Pew supports these recommendations and encourages the Council to initiate action on their motions at this meeting. Specifically, we support the following data improvements as a way to supplement and enhance the existing recreational data collection programs:

- The implementation of a permit system for private recreational boats fishing in federal waters. Although we recognize that this in itself does not provide necessary data to monitor fishing participants and their catch, it would help to better define the universe of anglers that target federally-managed species. This in turn provides a foundation upon which the Council can build to improve monitoring of federally-managed recreational fisheries.
- A system that keeps track of individual red snapper caught ("fish tags", "coupons", or "daily permits") that can be validated and used to supplement other data collection programs in order to improve catch estimates of red snapper.
- Working with MRIP to develop a pilot program testing the feasibility of electronic data reporting for private anglers using a panel-based approach from a sub-sample of the boat permits or saltwater licenses.

Conclusion

Thank you for the opportunity to provide input on these important issues before the Council. We look forward to working with you to protect and conserve the Gulf's public fisheries resources.

Sincerely,

Chad Hanson
Senior Science and Policy Analyst
Gulf of Mexico Fish Conservation
The Pew Charitable Trusts

Subject: For-Hire Red Snapper Days-at-Sea Pilot Program Scoping Meetings
Date: Wednesday, April 3, 2013 9:32 AM
From: tom adams <4tomadams@gmail.com>
To: Info <Info@gulfcouncil.org>, Charlene Ponce <charlene.ponce@gulfcouncil.org>
Conversation: For-Hire Red Snapper Days-at-Sea Pilot Program Scoping Meetings

I spoke with Pam Dana about trying to be able to voice the opinion of the RFA and myself-on the Days at Sea meeting in Destin by phone, since we, (fishermen from St Marks to Panama City) keep being ignored and expected to drive hours for these scoping meetings. Well, the phone call idea didn't materialize so I am writing to say that we are against any days at sea program and any program that takes sector separation in order to implement it. We along the big bend, would appreciate meetings in our areas; these areas are not strongholds for the few that do want sector separation and other EDF backed schemes. If the Gulf council is interested in hearing from fishermen that are not EDF/CFA sponsored you will have to change your meeting places as has been asked. You needn't worry about getting the EDf/ CFA,s opinion as they pay for the people to attend all these meetings. Shane Cantrell was all the way down in St Pete for the **For-Hire Red Snapper Days-at-Sea Pilot Program Scoping Meetings from Texas just the other day. What a joke. What the council needs to worry about is getting the rest of the populations opinion, and for the council to realize there are not that many people that attend these meetings unless you have them locally. Except for the ones from EDF/CFA that are come from all over to make it look like the majority want these schemes when the exact opposite is true.**

Thanks,
Capt. Tom Adams- Mexico Beach Charters
Recreational Fishing Alliance- Chairman- Forgotten Coast Chapter
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Subject: Scoping meetings Please post
Date: Thursday, March 14, 2013 6:32 PM
From: tom adams <4tomadams@gmail.com>
To: Info <Info@gulfcouncil.org>, Charlene Ponce <charlene.ponce@gulfcouncil.org>
Conversation: Scoping meetings Please post

Unfair Gulf Council scoping meetings

--I suppose that the Days at Sea meeting that is being held in Destin this month is being held there, because that is where the small stronghold of sector separation, or as its new name,(days at sea) people are located. In fact, I find that all the meetings for DAS are located in the few cities where the strong holds of EDF backed –pro SS,pro days at sea, pro recreational catch shares captains are located. It also happens to be in the same cities where the boys live, that you have on every one of the AP;s and committees. And these same boys have multiple seats on these panels for many years. Everyone seems to see a concentrated effort to get SS by the Gulf council. I find the actions of the Gulf Council becoming more convoluted with each passing meeting. No one seems to be concerned with the health of the fisheries. Anyone that spends 100 days a year on the water will tell you there are too many Red Snapper in the N gulf.. That should be the major concern of the council at this point. How can we find a way to get some of these snapper fished out before the imbalance that the RS are causing on our reefs gets any worse? But that is not what we hear at meetings-all we hear is different ways the government can have more control over the fishermen. VMS whatever. It seems like the answer the NMFS has come up with now, to help the over populations of red snapper, is to let them blow up rigs and waste several million pounds of fish a year. They could be using the big shears to cut the rigs off or even better—Let us fish for them and then use shears.

So I assume, if the council wants to cater to this 10-20% of charter fishermen who want this DAS, instead of fixing the problem –you will all get to hear what you want to hear at these scoping meetings. It seems like you would have already heard enough of this same banter from your AP members since that happens to be where you are holding every scoping meeting. Its not that I see more and more people and captains showing up at these meetings asking for ss,rec catch shares,rec IFQ's or a DAS program—it is just that the same few

people are more consistent and never miss a meeting, but of course that is where you are having the meetings, where the few pockets of fishermen that support EDF ideas live. Does anyone see a pattern here??

Of course you cant have DAS or intersector trading, without Sector separation. If you don t believe me, read what the Feds say http://www.gpo.gov/fdsys/pkg/FR-2013-03-14/html/2013-05976.htm

Thanks,

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Subject: For-Hire Red Snapper Days-at-Sea Pilot Program
Date: Friday, March 8, 2013 12:42 PM
From: william hixson <wmhixson@gmail.com>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: For-Hire Red Snapper Days-at-Sea Pilot Program

I am a recreational fisherman, private boat owner, and a charter boat owner/ operator.

I think there are 2 problems with the systems governing the red snapper resource. The first is the flawed methodology that determines how many snapper are in the Gulf. The second is the allocation of red snapper to a very limited commercial fishing interest versus to the recreational angler.

I support an increase in the recreational angler quota above the current level of 49%. The amount of $$$ generated per pound of red snapper is astronomical and the recreational angler is a strong economic engine that should not be taken for granted.

I also support allocation of the recreational quota to charter/for hire boats. Our boat is made in Alabama. It is maintained in Alabama. It is docked in Alabama. It employs people from Alabama. It buys ice, fuel, tackle, food, supplies in Alabama. Our clients stay in condominiums and eat at restaurants at the Gulf. Similarly, the charter/for hire industry is another strong economic engine that should not be ingored or neglected.

The interests of the recreational angler that chooses to go charter fishing deserve to be represented. The number of dollars generated per pound of fish should exceed that of the recreational angler. Additionally, I am losing money so I would not at least profit (I might benefit from; lose less money) from an allocation of the recreational quota to charter/for hire boats.

Such an allocation of the recreational quota to charter/for hire vessels could dramatically help the charter/for hire industry FOR THE USE OF THE SAME AMOUNT OF RESOURCE. We would only be allocated an amount of fish that we could catch based on whatever criteria are used (reef permit passenger number, history, etc) and we would be able to catch those fish when ever our clients want. Instead of running nothing but snapper trips during our 27 day season, we could run offshore tuna trips in which we may or may not target snapper and our clients can choose to fish for snapper at other times of the year; filling condominiums and restaurants at times other than the peak season in June.

I support and reallocation of red snapper in favor of the recreational angler. I

support the concept of allocating a portion of the recreational quota to charter/for hire vessels. We need to fix the "system" that says we do not have enough snapper in the gulf. The current system and its conclusions defy logic; the epitome of a "Catch 22". A waning resource does not result in bigger and bigger fish every year. There are probably too many red snapper in the gulf and they are eating everything else up (triggerfish as an example).

Thank you for your consideration. William C Hixson