

Subject: (none)

Date: Thursday, July 18, 2013 8:01:21 AM Eastern Daylight Time

From: sbeiler62@netzero.net

To: Gulf Council

[Subject](#): MY COMMENTS FOR 7-17-13 Red Snapper meeting

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

The current stock assessment shows justification for a six months season, and possibly that we should never have lost that six month season. The economic impact of this return of wrongfully denied fishing opportunities would be huge, although nothing can mitigate the damages caused by needless loss of jobs and fishing rights.

Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1.

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Steve Beiler
1001 Annie Laurie Lane Sarasota, FL. 34240

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 4:52:11 PM Eastern Daylight Time

From: chuck weddel

To: Gulf Council, FloridaWildlifeCommission, Denny Fishing Rights Alliance, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Chuck Weddel
5008 W Linebaugh Avenue Ste 35
Tampa, FL 33624

Subject: NMFS overestimates red snapper landings by 70%

Date: Tuesday, July 16, 2013 12:21:46 PM Eastern Daylight Time

From: Dennis O'Hern

To: Gulf Council, , , Martha Bademan, , Doug Gregory, commissioners@myfwc.com

Dear Council members and other concerned parties:

Please review the attached documents.

They provide you with the information that you need to set the recreational red snapper supplemental fall season at a full three months. Suggested start is September 1 at the latest.

Recreational anglers have long been denied their right to fish for red snapper. Jobs and economic activity have been lost, for no good reason.

You have the proof you need to take action. A 70% over-estimate is unacceptable and needs to be addressed right away by restoring the fishing opportunities so wrongly denied to the recreational sector. Thank you for your consideration of this matter.

Sincerely,

Dennis O'Hern
Fishing Rights Alliance

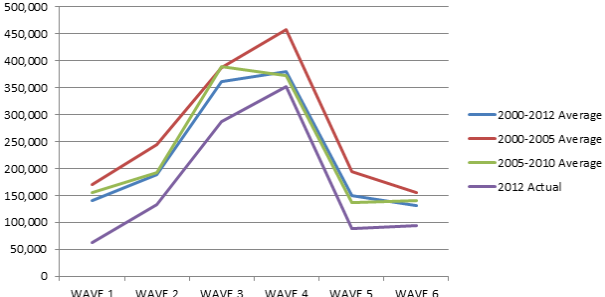
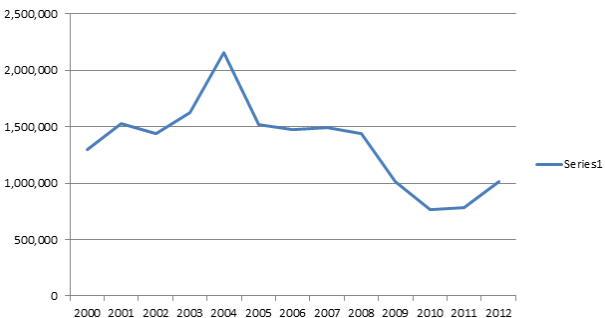
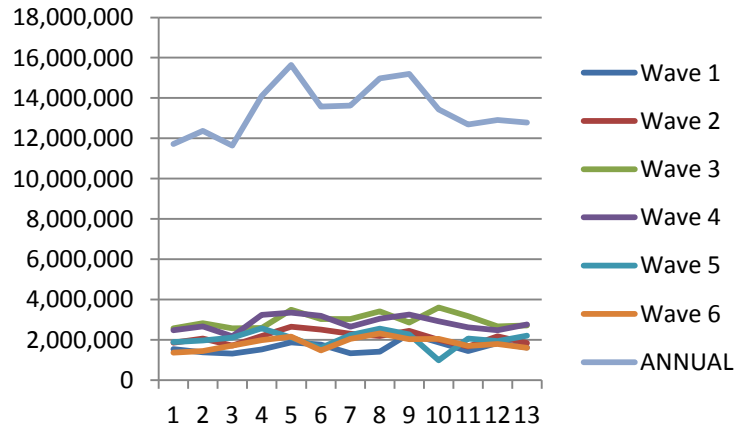
OVER-ESTIMATION COSTS JOBS AND FISHING RIGHTS

NMFS contends that effort compression (EC) is caused by shortened seasons. The concept of EC holds that a person who would fish three times for Red Snapper in a six month season would actually fish almost the same numbers of trips in any reduced season (say 2 to 2.5 trips instead of three). NMFS uses EC to calculate allowable fishing days, assuming that no anglers will leave the fishery. They also, it appears, use EC in calculating MRIP landings, causing over-estimation of landings on the order of 70%.

Reduced seasons have, in reality, caused an exodus of anglers from the red snapper fishery. No boat sales, bait or tackle sales support anything near the level of NMFS' estimates for trips and landings in the Gulf recreational fisheries. NMFS has wrongly cost our communities jobs and unconstitutionally denies us our right to fish.

The current Red Snapper assessment shows that NMFS wrongfully reduced allowable catch, and that red snapper recreational season should not have been reduced. The time to remedy this is NOW. RIGHT NOW. WE MUST ACT TO RESTORE OUR OPPORTUNITY TO FISH. Open recreational Red Snapper for three months, September, October and November.

THESE MRIP FIGURES COMPARE PRIVATE/RENTAL BOAT TRIPS. Produced by the Fishing Rights Alliance. Thefra.org

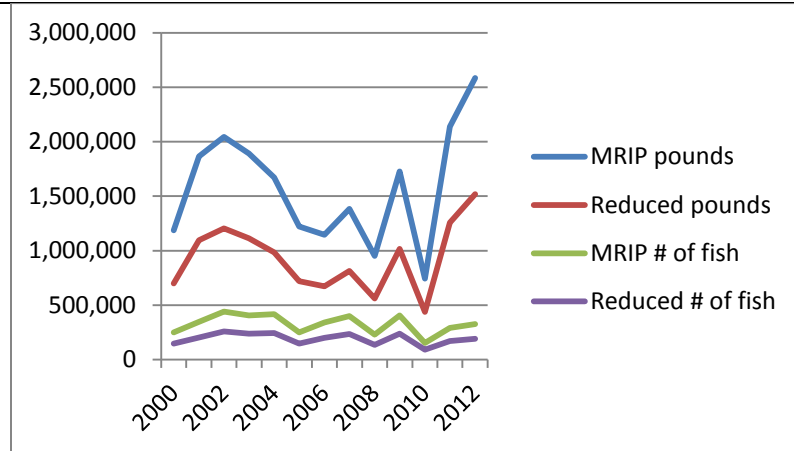
<p>Effort Compression is not occurring.</p> 	<p style="text-align: right;">www.thefra.org</p> <p>This Graph compares various averages 2000-2012, 2000 -2005, 2005 -2010, 2010-2012</p> <p>Notice that the shape of the graphs are all consistent.....this is inconsistent with the notion that effort compression is occurring.</p>
<p>ABOVE: THESE MRIP FIGURES COMPARE PRIVATE/RENTAL BOAT TRIPS INTO FEDERAL EEZ</p>	
	<p style="text-align: right;">www.thefra.org</p> <p>You must assume that the number of trips had to increase overall.....from one year to the next</p> <p>As you can see since the anomaly in 2004 trips have been on the decline.....</p>
<p>ABOVE: THESE MRIP FIGURES COMPARE PRIVATE/RENTAL BOAT TRIPS INTO FEDERAL EEZ</p>	
	<p style="text-align: right;">www.thefra.org</p> <p>This Graphs overlays all the wave data for private/rental trips into state and federal waters.</p> <p>There is nothing that suggests that...</p> <ol style="list-style-type: none"> 1. We took more trips in our shortened season 2. Took more trips over all 3. Squeezed our trips from other parts of the year into 44 days
<p>ABOVE: THESE MRIP FIGURES COMPARE PRIVATE/RENTAL BOAT TRIPS IN ALL WATERS, STATE AND FEDERAL</p>	

NMFS OVERESTIMATES LANDINGS BY 70%!!

Louisiana proves it. In 2012, Louisiana started to accurately count the recreational Red Snapper landed in the state. This is the first time we have had empirical evidence supporting the Fishing Rights Alliance contention that NMFS over-estimates our landings, unnecessarily costing us our jobs and fishing rights. See below.

We must act NOW to restore our fishing rights and begin to rebuild our shattered recreational fishing industry.

We should have a three month fall recreational Red Snapper season this year. September through November.



Year	MRIP pounds	Reduced pounds	MRIP # of fish	Reduced # of fish
2000	1,188,028	698,840	248,943	146,437
2001	1,863,658	1,096,269	345,668	203,334
2002	2,044,624	1,202,720	441,454	259,678
2003	1,889,946	1,111,732	405,711	238,653
2004	1,672,418	983,775	416,645	245,085
2005	1,222,191	718,935	250,372	147,277
2006	1,145,198	673,645	341,118	200,657
2007	1,384,105	814,179	399,245	234,850
2008	953,034	560,608	230,346	135,497
2009	1,726,332	1,015,489	404,378	237,869
2010	744,032	437,665	152,980	89,988
2011	2,138,554	1,257,972	290,425	170,838
2012	2,583,235	1,519,550	324,948	191,145

2012 Louisiana Landings

Counted by LA – 10,000 pounds per day
MRIP Estimate – 17,000 pounds per day

That is a **70% over estimate** from a hard counted number. Applying this to all Gulf RS landings, we should divide the MRIP estimated landings by 1.7 (weight and numbers of fish).

We should also divide the number of trips by 1.7, based on this over-estimate.

Subject: Red Snapper

Date: Wednesday, July 17, 2013 1:45:35 PM Eastern Daylight Time

From: Ray Odor

To: Gulf Council

[Subject](#): MY COMMENTS FOR 7-17-13 Red Snapper meeting

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We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Ray Odor Diving Service

2527 E. 149th. Ave.

Lutz, Fl.33559 Ph. 813-971-3368

www.spearfishing.cc

fishship@tampabay.rr.com

"You can always get the shaft from Ray"

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 10:20:16 AM Eastern Daylight Time

From: Matthew Avery

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Matthew Avery
Parrish, FL

Subject: Red Smapper

Date: Wednesday, July 17, 2013 10:10:32 AM Eastern Daylight Time

From: Daniel Folk

To: Gulf Council

Extend season

Sent from my iPhone

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 9:16:40 AM Eastern Daylight Time

From: Don Russell

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Don Russell
610 Island Way
Clearwater, FL 33767



PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL.

Subject: My Comments 0717/2013 Red Snapper Meeting

Date: Wednesday, July 17, 2013 8:29:40 AM Eastern Daylight Time

From: Bruce Waits

To: Gulf Council

Dear Council members and other concerned parties:

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Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1. I only made one trip this season and got 2 red snapper due to weather conditions that would not allow for a trip far enough out in my area to get red snapper.

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

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Thank you for your consideration.

Bruce Waits
7031 Dalkeith Avenue
St. Petersburg, Fl. 33709

Subject: 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 8:28:02 AM Eastern Daylight Time

From: Randy Webb

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us>

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Thank you for your consideration.

Randy Webb
3405 Avocado Rd
Largo, FL 33770

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 7:55:04 AM Eastern Daylight Time

From: Skip Roberts

To: Gulf Council, dale.diaz@dmr.ms.gov

Dear

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Thank

you for your consideration.

David "Skip" Roberts

Gautier, Ms

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 7:44:02 AM Eastern Daylight Time

From: kbenedict1@tampabay.rr.com

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Chris Benedict
16025 Shinnecock Dr
Odessa, FL 33556

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Wednesday, July 17, 2013 7:31:59 AM Eastern Daylight Time

From: Todd.Matherne@shell.com

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Todd Matherne
2584 Sandpiper Cir
Marrero, La 70072

Subject: Public Comments

Date: Wednesday, July 17, 2013 7:09:05 AM Eastern Daylight Time

From: Chris McCaffity

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Sincerely,

Chris McCaffity

Subject: My Comments For 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 11:32:16 PM Eastern Daylight Time

From: Hoogboats@aol.com

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Brent Kempton
Saint Petersburg, FL.

Subject: (none)

Date: Tuesday, July 16, 2013 11:16:32 PM Eastern Daylight Time

From: popz101

To: Gulf Council

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

The current stock assessment shows justification for a six months season, and possibly that we should never have lost that six month season. The economic impact of this return of wrongfully denied fishing opportunities would be huge, although nothing can mitigate the damages caused by needless loss of jobs and fishing rights.

Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1.

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Chief David R. Andrew
Orlando Fire Department

Subject: COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 11:12:37 PM Eastern Daylight Time

From: Clifford vandenbosch

To: Dennis O'Hern

CC: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

Dear Council members and other concerned parties:

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Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

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Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1.

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Thank you for your consideration.

P. Clifford Vandenbosch
225 Fiesole Street
Venice, FL 34285

Sent from Cliffs Mac
cliffv@me.com

Subject: My right to fish

Date: Tuesday, July 16, 2013 10:38:21 PM Eastern Daylight Time

From: Rob

To: Gulf Council

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

The current stock assessment shows justification for a six months season, and possibly that we should never have lost that six month season. The economic impact of this return of wrongfully denied fishing opportunities would be huge, although nothing can mitigate the damages caused by needless loss of jobs and fishing rights.

Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper [from September 1 to December 1](#).

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Sincerely,

Rob BuShéa

Cell 8133173817

507 driftwood dr e

Palm harbor fl 34683

Subject: Subject : MY COMMENTS FOR 7-17-13 Red Snapper meeting
Date: Tuesday, July 16, 2013 9:37:15 PM Eastern Daylight Time
From: Bob Bryant
To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

Category: AP-Data Collection

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance. Base on this and additional research I have conducted; it is highly likely that the recreational sector is owed quota from 2010, 2011 and 2012....I estimate approximately 2.75 million pounds....as such I think this should be divided up and distributed over the next three years, guaranteeing us a 192 day season and a 2 fish bag limit for the next 3 years to be reviewed in the 3rd year for years beyond....

The current stock assessment shows justification for a six months season, and possibly that we should never have lost that six month season. The economic impact of this return of wrongfully denied fishing opportunities would be huge, although nothing can mitigate the damages caused by needless loss of jobs and fishing rights.

Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1.

I would also like to request that consistency in management and data be employed, by setting the recreational quota in numbers of fish, which should be based on the quota in pounds divided by the 3 year running average for weight of fish. For example if the recreational sector is allocated 2.5 million pounds and the 3 year running average is 5.5 pounds per fish then the allocation should be set as 454,450 fish to be caught 2 per person per trip throughout the 192 day season that you will be returning us to. This only makes sense because, recreational bag limits are set in numbers of fish, not pounds.

Recreational anglers are being short changed as the stock grows healthier by setting quota based on decades old assessments. A review of 2000 to 2012 reveals, that if numbers and not pounds were used to manage the recreational anglers, we would have under fished our quotas beginning in 2004 through 2012. It is mathematically impossible, statistically inaccurate, and **intellectually dishonest** to set recreational quotas by pounds, and then manage individual fishermen by numbers....You don't tell a commercial fisherman that he is limited to 5000 fish, you tell him he is limited to 32500 pounds, so why would you set a quota in pounds and then tell anglers they are limited to 2 fish....It is bad management, bad math, and short changes the recreational sector of a valued resource, jobs, economic activity and robs us of our opportunity to fish.

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Your name: Capt. Bob Bryant
Address 7217 6th Ave N, Saint Petersburg, FL 33710

Bob Bryant - President/CEO

Actuarial Systems Group
www.subocorp.com
(727) 420-0722

Subject: Red Snapper Season review

Date: Tuesday, July 16, 2013 8:02:20 PM Eastern Daylight Time

From: Bob lazarchik

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

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Thank you for your consideration.

Bob Lazarchik
Ruskin, FL

Subject: Comment
Date: Tuesday, July 16, 2013 7:18:19 PM Eastern Daylight Time
From: Donald Waters
To: Gulf Council
Category: AP-CMP, AP-Red Snapper, Commercial

July 16, 2013

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

Re: Draft Framework Action to the Reef Fish FMP; Red Snapper 2013 Quota Increase and Supplemental Recreational Season

Dear Mr. Boyd:

The undersigned commercial red snapper fishermen submit these comments on the above referenced framework action for Gulf red snapper (the "July Framework Action") that will be considered at the special meeting of the Gulf Council on July 17, 2013 in New Orleans.

Our primary concern is with the continuing lack of effective accountability measures to ensure that the recreational sector adheres to its red snapper quota and the continued tolerance of significant annual catch overages in the recreational sector. The recreational sector as a whole is catching about 50% more red snapper every year than it is supposed to – the average annual overage in the recreational sector between 2007 and 2012 (excluding 2010 when there was no overage due to fishing restrictions caused by the Deepwater Horizon spill) has been 48.8%. These overages are inhibiting progress towards rebuilding the stock, harming the commercial sector by depressing catch limits, and effectively reallocate the quota from the commercial to the recreational sector in contravention of the Reef Fish FMP. The Gulf Council should adopt measures to avoid these overages in compliance with legal mandates. Our specific recommendations regarding the July Framework Action are as follows.

1. The "Constant Catch" Approach Requires Effective Accountability Measures for the Recreational Sector

We support the "constant catch" approach for managing the red snapper fishery through 2015. This approach is precautionary, takes due account of questions about the strength of the recruitment into the fishery in 2014 and 2015, and should provide additional stability and predictability by spreading out the potential quota increase in 2013 over the next two years. We recommend that the Council set the fishery-wide ACL for 2013 at [11.0] million pounds.

However, the constant catch approach will fail without sufficient accountability measures to ensure that the recreational sector adheres to its quota. If the recreational sector exceeds its quota in 2013 as it has in every year but one since 2007, then the catch limits in 2014 and 2015 will not be "constant" but will have to take a corresponding reduction to account for the overage. Thus, a lack of effective accountability measures in the recreational sector threatens to reduce the catch limits applicable to the commercial sector in 2014 and 2015.

2. The Council Should Establish a Separate Buffer to Address Management Uncertainty in the Recreational Sector

Action 1 of the July Framework Action would set the fishery-wide ACL at various levels below ABC. The stated purpose of having such a buffer between ACL and ABC is twofold: first, to allow for a “constant catch” through 2015; and second, to absorb potential overages in the recreational sector. These twin objectives directly conflict with one another. If there is an overage in the recreational sector, then the ability to achieve a “constant catch” will be jeopardized. Thus, all of the options under Action 1 are arbitrary.

To remedy this problem, the Council should instead adopt a two-step process. First, the Council should set the fishery-wide ACL where necessary to ensure a “constant catch” through 2015. Second, the Council should then adopt a separate buffer to account for management uncertainty in the recreational sector. This buffer should be sufficient to absorb the average annual catch overage over the past five years (e.g., approximately 50%). It is unfair and inequitable to reduce the ACL for both recreational and commercial sectors for the purpose of absorbing foreseeable overages by the recreational sector. There is no management uncertainty in the commercial sector; as the July Framework Action notes (at p. 11) the commercial sector “has maintained landings at approximately 97% of their quota since the IFQ program was implemented in 2007.” All of the management uncertainty is on the recreational side. Thus, the recreational sector must have its own separate buffer to account for its own management uncertainty. There is no justification for penalizing the commercial sector by reducing its catch limit to subsidize the overages on the recreational side.

3. The Range of Options in the July Framework Action is Too Limited

The range of options in the July framework action is too limited because it does not include an alternative that would establish a separate buffer to address management uncertainty in the recreational sector. The Council’s ACL/ACT control rule calls for a separate buffer in these circumstances. Consistent with that control rule, the framework action the Council adopted in March 2013 had an option (Action 1, Alternative 3) that would have reduced the recreational sector ACL by 20%. There is no similar option in the July Framework Action, nor is any justification provided for why such an option was excluded.

4. Any Overages from the June Recreational Season Must Be Paid Back Before Any Fall Season Should Be Allowed.

It is our understanding that all of the options in the July Framework Action would deduct any catch overage from the June recreational season from the quota increase that could allow for a fall season. Deducting any overage from the June seasons before allowing a fall season is critical to ensuring that the recreational sector adheres to its catch limit in 2013. This means that whether there will be a fall recreational season, and the duration of that season, cannot be determined until preliminary landings data are obtained from the June season. We are encouraged that the Council is adopting a payback provision and expect that this precedent will continue in future years to account for any recreational overages.

Thank you for considering our views.

Sincerely,

Buddy Guindon

Wayne Werner

Donny Waters

1

}-)))*> Donny Waters

Subject: fishing

Date: Tuesday, July 16, 2013 7:08:34 PM Eastern Daylight Time

From: Steve Stough

To: Gulf Council

MY COMMENTS FOR 7-17-13 Red Snapper meeting

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

The current stock assessment shows justification for a six months season, and possibly that we should never have lost that six month season. The economic impact of this return of wrongfully denied fishing opportunities would be huge, although nothing can mitigate the damages caused by needless loss of jobs and fishing rights.

Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1.

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Steve Stough

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 4:46:37 PM Eastern Daylight Time

From: cathy carey

Dear Council members and other concerned parties:

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Thank you for your consideration.

Cathy Carey
9901 1st St E #D
Treasure Island, FL
33706

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 4:47:41 PM Eastern Daylight Time

From: ObosT@aol.com

To: Gulf Council

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

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Thank you for your consideration.

Terry Sobo
7941 Mercantile St.
North Fort Myers, FL
33917

Subject: Red Snapper

Date: Tuesday, July 16, 2013 4:51:00 PM Eastern Daylight Time

From: Bill Langston

CC: Gulf Council, commissioners@myfwc.com, Dennis O'Hern, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

[Subject](#): MY COMMENTS FOR 7-17-13 Red Snapper meeting

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Thank you for your consideration.

Best Regards
Bill Langston
678-546-9828
Cell 678-643-9305

The longer I live, the less time I have to go fishing.

Subject: ARS meeting

Date: Tuesday, July 16, 2013 4:53:56 PM Eastern Daylight Time

From: Charles Domson

To: Gulf Council

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

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Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper [from September 1 to December 1](#).

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Charles Domson
102 Driftwood Dr

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 4:58:00 PM Eastern Daylight Time

From: John Herrera

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

John A. Herrera

John A. Herrera, M.Acc., J.D., LL.M., CPA
Board Certified Tax Attorney
Law Offices of John A. Herrera
2501 South Ocean Boulevard
Suite 107
Boca Raton, FL 33432

Voice: (561) 392-4626

Fax: (561) 392-9889

Toll-Free: (888) 445-3656

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 4:59:30 PM Eastern Daylight Time

From: Jeff Paddock

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Jeff Paddock
3948 14th Way NE
St Petersburg, FL. 33703

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 5:01:40 PM Eastern Daylight Time

From: Ed Bokor

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Edward Bokor
1811 Bayou Grande Blvd N.E
Saint Petersburg, FL 33703

Subject: Red Snapper meeting

Date: Tuesday, July 16, 2013 5:09:41 PM Eastern Daylight Time

From: jamesmmartin1010@aol.com

To: Gulf Council

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

The current stock assessment shows justification for a six months season, and possibly that we should never have lost that six month season. The economic impact of this return of wrongfully denied fishing opportunities would be huge, although nothing can mitigate the damages caused by needless loss of jobs and fishing rights.

Based on this information and the exceptionally strong red snapper stock assessment, I ask that you open the opportunity to recreationally fish for red snapper from September 1 to December 1.

Any season that you do choose should overlap the gag grouper season. What a great offshore trip it would be to once again get gag, red snapper and amberjack. With \$5 fuel at the dock, don't look for a stampede of anglers. It would be nice to see anglers anticipate fishing trips with a broad window of opportunity. This opportunity is the economic driver of the recreational fishery.

We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

James Martin
Clearwater , FL

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 5:20:44 PM Eastern Daylight Time

From: Thomas P. Tafelski

To: Thomas P. Tafelski

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

Please review the NMFS 70% overestimate document and the Effort Compression document sent to you by the Fishing Rights Alliance.

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Thank you for your consideration.

Tom Tafelski

12841-66 Street N.

Largo, Fl. 33773

727-420-1722

Subject: DOGFISH TACKLE RED SNAPPER COMMENTS

Date: Tuesday, July 16, 2013 5:56:33 PM Eastern Daylight Time

From: Dogfish Tackle

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

CC: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com

We lost a large amount of business due to the unnecessary shortening of the Red Snapper season. The total poundage of recreational catch we believe is grossly exaggerated by National Marine Fisheries. Please take that into account when determining the fall season. The recreational fisherman desire better management of the Red Snapper, a lot of businesses depend on it.

Dave Bayes
Dogfish Tackle Co.
727-393-2102
www.dogfishtackle.com

Subject: Comments for Red Snapper Meeting 7-17-13

Date: Tuesday, July 16, 2013 6:15:44 PM Eastern Daylight Time

From: Happel, Kyle I.

To: Gulf Council, 'commissioners@myfwc.com', 'fra@tampabay.rr.com', 'fish@surelurecharters.com', 'john@blaylockoil.com', 'labele@fsu.edu', 'rshipp@jaguar1.usouthal.edu', 'fishorangebeach@gmail.com', 'hkaywilliams@hotmail.com', 'corkyperret@bellsouth.net', 'nolah@aol.com', 'cematens@yahoo.com', 'douglassboyd@yahoo.com', 'p.f.riley@comcast.net', 'martha.bademan@MyFWC.com', 'chris.blankenship@dcnr.alabama.gov', 'Kevin.Anson@dcnr.alabama.gov', 'dale.diaz@dmr.ms.gov', 'rpausina@wlf.louisiana.gov', 'robin.riechers@tpwd.state.tx.us'

Dear Council members and other concerned parties:

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We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Kyle I. Happel, M.D.
Associate Professor of Medicine
Section of Pulmonary / Critical Care
LSU Health Sciences Center
1901 Perdido St Suite 3205
New Orleans, LA 70112
voice & fax (504) 568-3168
pager (504) 679-7927
khappe@lsuhsc.edu

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 6:31:36 PM Eastern Daylight Time

From: Louis Rossignol

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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We have voiced concern over excessive landings and effort estimates for years. You now have before you empirical proof of what we have said. We have been wrongly punished. The time has come to give us back that which is ours.

Thank you for your consideration.

Louis Rossignol
4300 lake Trail Dr.
Kenner, La. 70065

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 6:44:35 PM Eastern Daylight Time

From: MIKE WILKES

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

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Thank you for your consideration.

Michael A Wilkes
13909 Sommers Ave
Hudson, Fl 34667
www.porthudsonfishingclub.com

Subject: MY COMMENTS FOR 7-17-13 Red Snapper meeting

Date: Tuesday, July 16, 2013 6:56:10 PM Eastern Daylight Time

From: Cyril Gonzales

To: Gulf Council, commissioners@myfwc.com, fra@tampabay.rr.com, fish@surelurecharters.com, john@blaylockoil.com, labele@fsu.edu, rshipp@jaguar1.usouthal.edu, fishorangebeach@gmail.com, hkaywilliams@hotmail.com, corkyperret@bellsouth.net, nolrah@aol.com, cematens@yahoo.com, douglassboyd@yahoo.com, p.f.riley@comcast.net, martha.bademan@MyFWC.com, chris.blankenship@dcnr.alabama.gov, Kevin.Anson@dcnr.alabama.gov, dale.diaz@dmr.ms.gov, rpausina@wlf.louisiana.gov, robin.riechers@tpwd.state.tx.us

Dear Council members and other concerned parties:

Please accept the following as my comments for the supplemental Red Snapper season under consideration.

The red snapper is not overfished in the Louisiana area. I am a dive and have personally seen thousands of these fish on every rig from 35' of water to over 300' of water.

As to the recreational quota, I go spear fishing every weekend that the weather is 3' or less.

The entire red snapper season, I only got out one weekend on a Saturday. You can check the history as every weekend was too rough to head out, and I have a large cat boat.

As a result, I, a frequent fisherman, only harvested 2 red snapper for the whole season. If you can only fish on the weekends, there was only one weekend this year that was good for fishing. Most of us have jobs and can't fish on a Tuesday when the weather allows. So, how can your science estimate the fish were overfished this year when 3 of the 4 weekends were unfishable. I doubt many guys got out on a Wednesday when the weather was good.

The population is healthy and not overfished. Just put a camera on any rig in Louisiana waters.

Cyril Gonzales
Aqua Aces Dive Club
2013 Derby Board Chairman.

July 15, 2013

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

Dear Mr. Boyd:

Thank you for the opportunity to provide comments on the management of Gulf of Mexico fisheries. Environmental Defense Fund is writing to provide comments on the framework action to establish 2013 red snapper quotas that the Council will discuss at the July 2013 meeting.

The red snapper stock assessment delivered positive news that the stock is rebuilding. For 2013 a strong year class has driven a sharp increase in the recommended acceptable biological catch (ABC), providing the Council with the opportunity to increase both commercial and recreational quotas. We congratulate the Council on the early success of the rebuilding plan, but we recommend the Council proceed carefully and set an annual catch limit (ACL) that adequately accounts for the management uncertainty that remains by considering the following risks:

- Higher ABC levels over the near-term may be skewed by a few strong year classes. The red snapper fishery has a long way to go before the rebuilding target of 2032.
- The ACL should account for the worst possible performance in a fishery that has suffered from recreational overages that averaged 48% over the past five years.¹ Increased overages and high discard rates can be expected as long as management based on size limits, bag limits and seasons remains in place.
- As the Council sets the ACL with the goal of constant catch in future years, the constant catch level should be sufficiently low to account for other uncertainties including the potential for increased shrimping effort and its impact on juvenile red snapper mortality.

Additionally, we recommend that the Council apply the guidance in its ACL/ACT control rule directly to each sector, providing commercial and recreational management buffers of 0% and 15-20%, respectively. Management buffers tailored to each sector's performance provide incentive for accountability to catch limits. The recreational sector routinely exceeds its quota by significant margins while the commercial fishery has accurate landings data and complies with its quota. If the Council moves forward with setting the ACL using an arbitrary composite buffer, the commercial sector that is

¹ Gulf of Mexico Fishery Management Council (2013). ACL/ACT Control Rule Applied to Red Snapper. Tab B, 4(c) June 2013.

Mr. Doug Boyd, Chair

July 12, 2013

Page 2 of 2

largely responsible for the recovery of the stock will lose potential harvest. Otherwise, as stated in the control rule report, if the Council chooses not to follow the control rule, it “should explain its rationale.”²

Finally, we would like to comment on the Council’s June 2013 discussion on reducing the red snapper spawning potential ratio (SPR) target used as a proxy to estimate overfishing limits and maximum sustainable yield. Reducing the SPR target is inconsistent with advice from the Council’s SSC, which says that an SPR of 20.4% is “inappropriately low.”³ The SSC recommended a 26% SPR based on the degree of risk tolerance that is biologically appropriate. There is no scientific justification for moving forward with a lower SPR.

We look forward to continuing to work with the Council, NMFS, and states on the recovery of the red snapper stock and sound management of all the Gulf’s fisheries.

Sincerely,



Kristen McConnell
Senior Conservation Manager
Gulf of Mexico Oceans Program



Daniel Willard, PhD
Economist
Gulf of Mexico Oceans Program

² *Ibid.*

³ “...the SSC felt that the equivalent SPR for F_{MAX} (20.4%) was inappropriately low for species with life history parameters similar to red snapper.” See Gulf of Mexico Fishery Management Council (2013). Standing and Special Reef Fish SSC Meeting Summary. May 29-31, 2013. Tab B, 4(b) June 2013.

I tried to post online would not take it, My name is Joe Nash owner operator charter service in Orange Beach. I am concerned with the future of our fishries and the charter for hire federally permitted vessels. The data being used has been flawed and continues to be flawed . The CFH Sector has not had an oppurtunity to be ACCOUNTABLE we have offered and pleaded but no one will listen , yes the commercial sector has been accountable for past 6 yrs pat on the back for them. We are thrown in with the recs and do not have a chance, we are held to higher standards and laws and our size of the fleet has been the same for years as recs have grown. My proposal is if the gulf Tac goes up 5million lbs, why cant the 51% go to the charter for hire instead of the commercial let us manage our side and show some accountability. The commercial permit holders said they would be happy with what they have, now have changed their minds due to greed and the possability of leasing their fish to another sector. Why should 100 or so make so much, they have been on a long prosperous wave, give us a shot this would be cutting edge management for the fisheries and only makes sense we as the cfh had to share with the recs for years and we want to manage our fish, willing to catch smaller fish to extend our days whatever it takes.

Thank you, Capt Joe Nash 251-979-1812

As an avid outdoorsman I feel the fall season would be great. I fish a small boat and can't find many days to make it out to fish for Red Snapper in the short season we have now. With this proposed fall season the weather should be more calm and there will be no pressure from charter fishing. This gives me a better chance of having success. It is tough to justify all the money we spend on tackle, bait, maintaining your boat, and building private wrecks to fish with such a short season just to cater to tourists who don't really spend the money us recreational fishermen do. But with this extra season it makes all the money and time spent more justifiable. The Orange Beach, Alabama area has great fish to offer just need a little more time to enjoy the wonderful natural resource at our back door.

Thanks, Charles Lowery

James W – Weekend Only Season, please



June 21, 2013

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

Dear Mr. Boyd:

Thank you for the opportunity to provide comments on Gulf of Mexico fisheries, especially red snapper which featured prominently on your June meeting agenda. The end of “overfishing” and subsequent progress on rebuilding of the still-overfished red snapper stock is a true success story. It is a real-life demonstration that management reforms, like the transition from derby fishing to individual fishing quota (IFQ) management in the commercial fishery and scientific catch limits, can create ecological and economic benefits enjoyed by communities, seafood consumers, and recreational and commercial fishermen and fishing businesses.

Unfortunately, there is little progress in improving recreational red snapper management, and several actions on the Gulf Council’s agenda put the rebuilding at-risk by threatening the successful commercial program and failing to explore new tools to solve problems. In this letter, we provide several recommendations:

- Begin to explore a comprehensive vision of the red snapper and reef fish fisheries.
- Maintain the success of the commercial plan which is helping rebuild the stock and providing significant economic benefits.
- Strengthen the “regional management” proposal to provide lasting benefits, like longer seasons.
- Ensure that the catch limits foster continued rebuilding of red snapper and comply with the law.

1. Explore a comprehensive vision of the red snapper (and reef fish) fisheries.

Recreational and commercial fisheries are important to the Gulf’s economy and culture. Fishermen and seafood markets seek access, availability, flexibility, and the long-term health of the stock. The challenge before the Gulf Council is to find solutions to the challenges of managing a popular yet limited red snapper stock. If well managed, the fishery can provide benefits to all parties while balancing conservation objectives.

While there are tremendous resources devoted to improving the management of the red snapper fishery, there is little progress toward solving the ongoing challenges of shrinking seasons and overharvests in the recreational sector. There are no ideas under consideration that simultaneously seek benefits for fishermen, fishing businesses, and U.S. seafood markets. Thus, we offer the following idea for consideration.

The commercial management plan, operating in federal waters, is working well. This part is already in-place and serves growing demand for wild, fresh seafood. On the for-hire recreational side, a fleet-specific IFQ design could be explored for vessels that operate in federal waters. The boats would have the opportunity to make the most of the limited catch for angler clients and their businesses. For private anglers, the regional management concept under consideration by the Gulf Council may be a good start. States could have a designated quota and also authority to try tools that can perform better than short seasons and small bag limits. Harvest tags like those used for big game hunting might be allocated to tourist seasons, tournaments, and other priorities to expand fishing opportunities available with the limited catch.

When each part of the fishery is well-managed, then quota trading might be organized between all the sectors to accommodate the ebb and flow of fish demand among them.

2. Maintain the success of the commercial plan which is helping rebuild the stock and providing significant economic benefits.

The Council's commercial red snapper management plan implemented in 2007 – using IFQs and eliminating or reducing season closures, trip limits, and size limits – has helped end overfishing and is a big part of the reason the red snapper stock is growing. Keeping the program working effectively is central to continued rebuilding.

The Gulf Council's five-year review concluded that the red snapper IFQ program is achieving the conservation and economic goals established by the Gulf Council and Magnuson-Stevens Act. The program ended the destructive derby that resulted in dangerous fishing, poor economic performance, wasteful bycatch, and chronic overfishing.¹ The commercial fishery is harvesting under its quota while discarding has been reduced. Overfishing for red snapper has ended and the annual catch limit is steadily increasing. Ex-vessel prices and share prices have increased and stabilized under IFQs, reflecting confidence and expectation for long-run economic and biological improvements. Certain potential improvements were identified. We recommend that over time the commercial industry, other stakeholders, and the Gulf Council explore and implement long-term improvements, especially related to at-sea monitoring (to better account for remaining discards) and including additional reef fish species still managed under derby fishing in the IFQ program .

Amendment 28 to reallocate red snapper from the commercial to recreational quota states the “need” for the action as “to prevent overfishing while achieving the optimum yield.”² However, without improvements in management of the recreational fishery, the pattern of overages will continue even if the recreational quota is higher, and the result is almost certain to be larger quota overages. In addition, commercial management's contribution to rebuilding would be undermined by reducing fishermen's economic stake in the fishery.

Management actions that introduce risks to rebuilding and threaten to return the stock to “overfishing” status can be in violation of the Magnuson-Stevens Act's central requirement to prevent overfishing and the requirement to rebuild fisheries as soon as possible.³ Considerations of shifting quota to the recreational sector prior to improving catch accountability would call into question the red snapper FMP's requirement to contain “measures to ensure accountability,”⁴ and appears to violate National Standard 4, which states that allocations shall be “reasonably calculated to promote conservation.”⁵ In addition, while the Council currently

¹ Gulf of Mexico Fishery Management Council (2013). Red Snapper Individual Fishing Quota Program 5-year Review: Preliminary Draft.

² Gulf of Mexico Fishery Management Council (2013). Red Snapper Allocation. Draft Options Paper for Amendment 28 to the Fishery Management Plan for the Reef Fish Resources of the Gulf of Mexico.

³ Magnuson-Stevens Act, 16 U.S.C. §§ 1851(a)(1), 1854(e)(4)(A)(i).

⁴ Magnuson-Stevens Act, 16 U.S.C. § 1853(a)(15).

⁵ Magnuson-Stevens Act, 16 U.S.C. § 1851(a)(4).

emphasizes economic efficiency, National Standard 5 requires that economic efficiency cannot be the sole criterion in allocation decisions, overriding other national standards and rebuilding requirements.⁶

It is also important to note that the reallocation alternatives in Amendment 28 are not supported by the economic analysis presented. The issue of “economic efficiency” is being highlighted in relation to improving net benefits for the nation, one objective of fishery management. However, analysis from NMFS and the Council’s Socioeconomic SSC show that the proposals simply replace one inefficiency with another.^{7,8} While the analysis suggests the values (willingness to pay) for additional red snapper quota are different in the commercial and recreational sectors, it does not suggest that efficiency will be improved by shifting quota. This is because values change as allocations change, and how much those values could change is unknown. The best available science available cannot measure how reallocation will change net benefits to the nation. For these reasons, in its January 2013 motion, the Council’s Socioeconomic SSC stated it does not support reallocation except by trading quota across sectors.⁹

3. Strengthen the “regional management” proposal to provide lasting benefits including longer recreational fishing seasons.

There are a variety of proposals under consideration to improve recreational fishing. Under current management, the recreational sector collectively exceeds the quota most years, even though anglers and for-hire operations as a whole comply with regulations. As discussed above, the problem is the management plan, and this cannot be solved by adding more fish. New tools are needed.

The Gulf states have brought a proposal (Amendment 39) before the Gulf Council for “regional management.”¹⁰ The plan divides the recreational quota among states to manage off their own coasts. This can be a good start, and if designed well, regional management might offer some benefits; states might provide more local flexibility.

However, the plan needs to allow use of new tools, not just existing ones like short seasons and bag and size limits. States need authority to try concepts like harvest tags used for big game hunting that could be allocated to tourist seasons, tournaments, and other priorities. Catch limits are rising, but the management and monitoring challenges remain the same. It is difficult to understand how existing tools alone, even when managed by the states, will provide long-term benefits, and no supporting analyses have been provided.

As the Gulf Council plans public meetings around the region, it should answer key questions to help the public evaluate the plan. For example:

- How are states going to manage their sub-quotas?
- What benefits will private anglers and for-hire businesses and clients gain?

⁶ See Magnuson-Stevens Act, 16 U.S.C. § 1851(a)(5) "Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose."

⁷ Agar, J.J and D.W. Carter (2012). Is the 2012 allocation of red snapper in the Gulf of Mexico economically efficient? NMFS Southeast Fisheries Science Center.

⁸ Gulf of Mexico Fishery Management Council (2013). Report: Socioeconomic SSC Meeting. January 16, 2013.

⁹ The motion reads: “The Committee does not support a reallocation between sectors of the GOM red snapper as large as 1% without giving strong consideration to the market transferability across the two sectors.” Agar & Carter (2012) reach the same conclusion: “Inter-sector trading would allow the market to provide valuable price signals to help ensure that the red snapper quota is allocated efficiently and in a way that provides the greatest economic benefits to the nation.”

¹⁰ Gulf of Mexico Fishery Management Council (2013). Regional Management of Recreational Red Snapper. Public Hearing Draft for Amendment 39 to the Fishery Management Plan for the Reef Fish Resources of the Gulf of Mexico.

- What is the role of the proposed boundaries? Are harvests of sub-quotas restricted geographically?
- How are other reef fish in the mixed-stock affected by this entirely different management system?

Regardless, greater management authority should only be delegated by the Gulf Council to the states as they demonstrate how their plans will provide more benefits and perform (e.g., comply with catch limits) better than the existing plan – this should be a minimum hurdle for delegation.

4. Ensure that catch limits foster continued rebuilding of red snapper and comply with the law.

Everyone agrees it is good news that the red snapper stock is rebuilding. This success reflects the sacrifices of commercial and recreational fishermen with short-term cuts in catch limits as well as new management in the commercial fishery. Based on the recent stock assessment, red snapper catch limits can continue to rise, benefiting all fishermen, fishing businesses and seafood consumers.

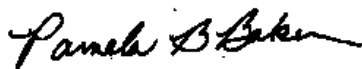
The Gulf Council's SSC has provided a higher overfishing limit (OFL) modified by very small (risky) "buffers" (100,000-200,000 pounds) for scientific uncertainty to provide allowable biological catch (ABC) limits. Due to signs of lower recruitment in a few recent years, their current best prediction is that the stock abundance is peaking now and might decline for several years and then stabilize beginning in 2014.¹¹

ABC levels are intended to capture scientific uncertainty in OFL estimates. With very small scientific buffers recommended by the SSC, it is important for the Gulf Council to carefully consider management uncertainty to avoid potentially moving the fishery back to overfishing status.

Today's recreational management plan has proven inadequate to constrain catches to limits over many years – this is the source of the vast majority of management uncertainty. The recreational sector routinely exceeds its quota, often by significant margins (average of 48% over the past five years),¹² and significant overages can be anticipated as long as management based on seasons and bag limits remains in place. At the same time, the commercial fishery has accurate landings data and complies with its quota limit.

Given these differences, the Gulf Council's report titled "ACL/ACT Control Rule Applied to Red Snapper" suggests tailoring management uncertainty buffers to the differing performance of recreational and commercial management – 15-20% and 0%, respectively. This is in contrast to recent years in which the buffers have been provided by both sectors, yet used only by the recreational sector. Thus, we recommend that the Gulf Council use its ACL/ACT control rule to develop and evaluate limits for the red snapper fishery and establish management buffers to keep the fishery rebuilding.

Sincerely,



Pamela Baker
Director, Gulf and Southeast Oceans Program



Daniel Willard, PhD
Economist, Gulf and Southeast Oceans Program

¹¹ Gulf of Mexico Fishery Management Council (2013). Standing and Special Reef Fish SSC Meeting Summary. May 29-31, 2013.

¹² Gulf of Mexico Fishery Management Council (2013). ACL/ACT Control Rule Applied to Red Snapper. Tab B, 4(c) June 2013.

Subject: FW: Troy Frady Public Testimony

From: Distraction Charters
Sent: Thursday, June 20, 2013 10:40 AM
To: Charlene Ponce
Subject: Troy Frady Public Testimony

Dear Gulf Council Members,

I am sorry I am not able to be with you this week in Pensacola. I am at sea and don't make it in until the chicken's are about to roost each day.

I know each of you are trying to do the right thing. I also understand how hard it is to try and please everyone. That in itself, is a task that is nearly impossible.

I want to encourage you to keep looking forward and continue to search for ways that will eventually create a long term win for the fishermen and a win for the fish.

For that reason, I am going to ask you to think strategically instead of tactically when you decide how and when the red snapper TAC increase will come.

Tactically, it makes sense to give the increase to us in July 2013, when we think we need them most. I do not need them because there are so many other species to target.

Strategically speaking, it makes more sense to try and stabilize the red snapper seasons for the next few years. If you hold off this year and give us the increase in 2014, we might get a longer season with a set start and ending date that might be 45 days (in federal waters) or more for the next few years. I know this is a long shot, but people are screaming for some kind of consistency in seasons so they can plan their year. I believe as painful as it may be this year, by giving us the increase next year, the dividends will be paid ten fold for all.

I appreciate all you do and your commitment to ensuring our fishery grows to be the envy of our nation. Keep up the good fight. You're on the right track.

Thanks.
Troy

Captain Troy Frady
[Http://distractioncharters.com](http://distractioncharters.com)
Orange Beach, Al.
251.975.8111

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St. Petersburg FL 33701



Ocean Conservancy
Start a Sea Change

727.895.2188 Telephone
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www.oceanconservancy.org

June 17, 2013

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

RE: Red Snapper Management Measures

Dear Chairman Boyd:

On behalf of Ocean Conservancy¹, please accept the following comments with respect to the Gulf of Mexico Fishery Management Council's (Council) discussion of the SEDAR 31 red snapper benchmark assessment, the Scientific and Statistical Committee's (SSC) recommendation for acceptable biological catch (ABC), and the annual catch limit (ACL) and annual catch target (ACT) control rule recommendation. The benchmark assessment results show that the red snapper population is responding to the rebuilding plan measures and that biomass levels are now higher than they have been for the past 50 years. This is a great success for Gulf of Mexico fisheries management. While we are encouraged by the results that indicate it is safe to increase allowable catches, we have some concerns about the stock assessment process and the handling of uncertainty in the assessment, projections, and ABC recommendations and make the following recommendations:.

- ***Set the total fishery ACL for 2013 no higher than 11.9 mp, and set the commercial and recreational ACTs at a level that appropriately accounts for management uncertainty.***
- ***Use Council-approved ACL/ACT control rule as the basis for calculating commercial allocations and recreational seasons but increase maximum buffer size to 30 percent, which would result in a 24 percent buffer for the recreational sector. Use a small buffer on the commercial side to account for uncertainty in commercial discards and re-evaluate the ACL/ACT control rule to include uncertainty in projected vs. actual dead discards.***

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.

- *Accelerate revision process of the ABC control rule and, in the interim, either do not employ tier 1 of the ABC control rule or use interim method of determining assessment uncertainty to use with the P* method.*
- *Initiate an amendment to determine appropriate and realistic annual catch specification procedures, including realistic timelines for stock assessments, and evaluate the ability of the fishery-science-management system in the Gulf of Mexico to properly support and fund annual assessment updates for high priority species.*

Red snapper is an iconic Gulf species and we have seen a notable increase in abundance and accompanying improvement in fishery catch rates over the last five years. This success is due to the Council enacting the appropriate science-based management measures in Reef Fish Amendment 27. Recent spikes in red snapper abundance, however, are due to strong year classes joining the adult population. The prognosis on the incoming year classes is not as good, and nobody knows whether recruitment overall will remain high or go back to lower levels seen in the past. There is considerable uncertainty about the productivity of the red snapper population, and a demonstrated inability to keep catch within the projected limit. Setting overly optimistic management measures would risk allowing overfishing to resume and nullify the rebuilding progress that has so painfully been made over the last five years.

ABC and ACL for 2013 and 2014

We recommend that the total fishery ACL for 2013 not be set higher than 11.9 mp and that the Council set ACTs that sufficiently account for management uncertainty. To avoid exceeding the OFL in the next years, we recommend that the Council set commercial allocations and recreational seasons based on its ACL/ACT control rule, but with the maximum control rule buffer size increased to 30 percent. This would result in a 24 percent buffer for the recreational sector. The ACL/ACT control rule should be re-evaluated to include uncertainty in projected vs. actual dead discards, and a small buffer should be implemented on the commercial side to account for the discrepancy in the meantime.

After the 2009 SEDAR 7 update assessment, the SSC set the ABC at 25 percent below the overfishing limit (OFL) due to the considerable amount of scientific uncertainty in the assessment. At that time, the Council's ABC control rule had not been finalized. The 25 percent reduction was in response to seemingly conflicting signals from the age composition data in the assessment which reflected a severely age-truncated and overfished population and the indices data which indicated that abundance was increasing. In retrospect, both data sources were accurate. Abundance was increasing, but this was due to the effect of a couple of strong year classes moving through the fishery, and rebuilding the age structure to healthy levels for a species as long-lived as red snapper will take time. The Council chose to set the ACL equal to the ABC and did not include any form of management uncertainty accounting or a catch target. Yet management uncertainty – notably, the ability of the management system to restrain red snapper catches to the ACL – in parts of the red snapper fishery remains high, as indicated by the

figure below. The figure below illustrates this for the commercial and recreational components of the fishery.

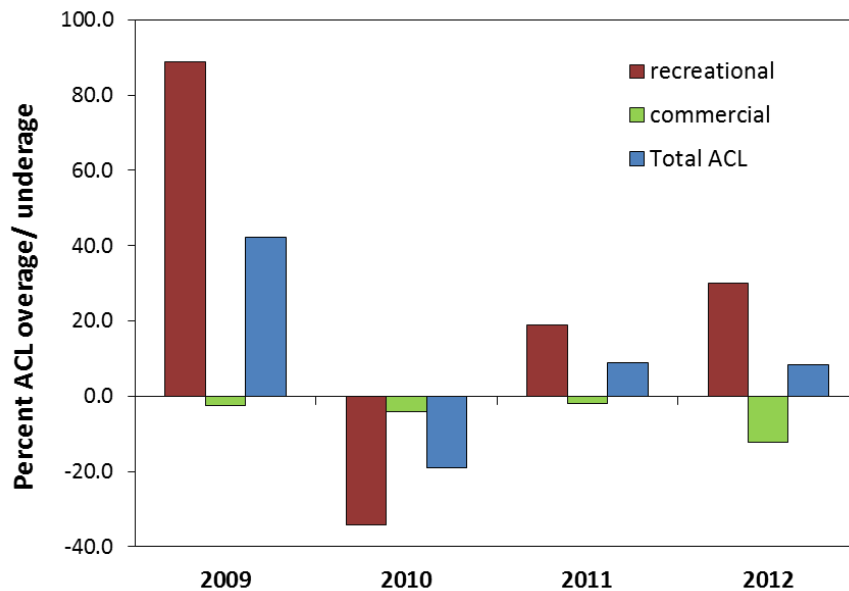


Figure 1. Four-year ACL performance of the Gulf of Mexico red snapper fishery. Data source: GMFMC Options paper for Amendment 39 (June 2013 GMFMC briefing book tab B, No. 3).

Figure 1 demonstrates substantial management uncertainty in the recreational fishery. The fishery exceeded its ACL from 19 to 89 percent in the last four years. The only year without an ACL overage was 2010 when there were fishery closures due to the BP Deepwater Horizon oil disaster during red snapper season. The average ACL overage of the recreational fishery over the last four years was 46 percent (25 percent if only looking at the last two years). This average is informative for setting ACL or ACT at a level designed to prevent overfishing based on management control history. Notably, there were no ACL overages in the commercial IFQ fishery. The commercial fishery was on average 5 percent under its ACL over the past four years indicating that catch targets closer to the catch limit may be appropriate.

Consideration of both scientific and management uncertainty is necessary in the overall management objective to end and prevent overfishing. It is, therefore, important to examine all of the relevant benchmarks and buffers used in the calculation of red snapper allowable catch. In spite of the large ACL overages in the recreational fishery and the absence of a buffer to account for this management uncertainty, the overfishing limit (OFL) was not actually exceeded in the last few years. This was due to the 25 percent scientific uncertainty buffer between OFL and ABC set by the SSC. By contrast, the new scientific uncertainty buffer provided by the SSC for 2013-2015 is on the order of only 1 to 1.5 percent in spite of the considerable existing scientific uncertainty (discussed further below), making the Council decision to set ACL less than ABC a critical one. In order to prevent overfishing, per the requirement of the MSA, we recommend that the Council reduce the ACL from the ABC, set an ACT below the ACL or both.

If the Council were to use its ACL/ACT control rule in its current form to calculate an ACL or ACT, the resulting weighted buffer would be zero percent for the commercial sector and 20 percent for the recreational sector.² (If the Council chooses to use an ACT, the IFQ allocation and recreational season length should be based on the ACT level.) The buffer sizes are constrained by the maximum buffer of 25 percent specified in the control rule. For the recreational sector, there is a very high chance that this constraint is too low, based on management performance over the last four years.

Dead discards are a growing problem in the commercial fishery, especially in the eastern Gulf where the rebuilding red snapper population is reoccupying areas from which they had formerly been fished out. The buffer size that is calculated from the ACL/ACT control rule on the commercial size is zero percent because landings have not exceeded the ACL and there is tight in-season control of landings. This does not incorporate the considerable uncertainty on the discard side, however. Dead discards are included in the overall yield projections at the target fishing mortality rate and are taken off the top of the catch level recommendation so that the ABC and ACL are in landings only. There is no accountability for exceeding projected dead discards. Nevertheless, discards do contribute to total catch, and uncertainty in the amount of dead discards contributes to management uncertainty. From 2009 through 2011, the commercial fleet that had IFQ allocation discarded 92 to 352 percent more red snapper (in numbers of fish) than allowed for in the projections of the 2009 red snapper update assessment.³ At an estimate of about 950,000 to 1.5 million lbs of dead discards for red snapper commercial IFQ shareholders between 2009 and 2011, that is a significantly higher amount of dead discards in this portion of the fishery than estimated in the 2009 projections. Thus while the commercial fishery did not exceed its allowable landings, it did likely exceed its total catch allowance (landings + discards). The ACL/ACT control rule does not account for this aspect of management uncertainty, which is a flaw in the control rule that should be addressed.

Based on past management performance, a 20 percent buffer for the recreational sector alone and no additional buffer for the commercial sector represent a high likelihood of resulting in not only an ACL but also an OFL overage in 2013 and 2014. The June Council meeting briefing book, Tab B, No. 4(c), provides examples of red snapper quota scenarios in the addendum. One of those examples (Scenario 4) sets the 2013 and 2014 quotas equal to the 2014 ABC and applies the ACL/ACT control rule to determine sector allocations and seasons. This still results in allocation and season increases over the status quo but avoids the undesirable scenario of first increasing the ACL in 2013 and then having to decrease it in 2014. We believe that this is a viable alternative for which the Council should solicit stakeholder feedback at the June meeting. We also note here, however, that our discussion of ACL/ACT buffers so far has not yet included the failure of the ABC control rule to provide an ABC that adequately reflects the amount of scientific uncertainty in the red snapper stock assessment and encourage the Council to also consider that factor (discussed below) during its discussions on where to set ACL or ACT.

² See GMFMC June 2013 Briefing Book Tab B, No. 49(c), p. 3-4.

³ Source: SEFSC, personal communication. See tables 1 and 2 in Appendix.

The ABC control rule

Until the problem with the generation of probability density functions can be resolved, we recommend that the Council and the SSC either do not employ tier 1 of the ABC control rule and instead make ABC determinations that realistically reflect scientific uncertainty on a case-by-case basis or employ default coefficients of variation for the probability density functions adopted from other regions like the Pacific where these defaults were quantitatively established.

The scientific recommendation for accounting for uncertainty went from a 25 percent buffer between the OFL and ABC in 2009 to a 1.5 percent buffer in 2013. The only way that this would make sense is if some major sources of assessment uncertainty had been addressed between SEDAR 7 and SEDAR 31. The major change that took place in SEDAR 31 was that the modeling platform was changed from CATCHEM to Stock Synthesis 3, and additional changes in input data and parameters. However, the major uncertainties that have potentially large impacts on assessment results, such as uncertainty regarding the stock-recruitment relationship and steepness, future recruitment deviations, and natural mortality remain unchanged. The probability density function did not adequately reflect those major sources of uncertainty, which is a systemic issue that has become apparent in previous Gulf of Mexico SEDAR assessments.⁴ The Council, the SSC, and the Science Center have been aware of this issue for some time, and the Council has asked that the ABC control rule be revised. This revision is underway but it is happening very slowly, due to problems generating realistic probability density functions. This is a major concern, and we recommend that tier 1 of the ABC control rule not be applied when there is concern that major sources of uncertainty are not captured in the probability density function. This is necessary because performance of the ABC control rule has been inadequate. Applying the control rule has resulted in unrealistically small buffers that cannot reasonably be expected to safeguard against overfishing as required by the Magnuson-Stevens Act. If ABCs are determined on an *ad-hoc* basis, the terms of reference for each SEDAR must spell out the analyses that will be needed to make ABC recommendations.

The timeline of SEDAR 31

We urge the Council and the SEDAR steering committee to work with the SEFSC to set accurate and realistic timelines for stock assessments to ensure the quality of the scientific product that reaches the Council.

The handling and timing of the SEDAR 31 red snapper benchmark had an adverse effect on the quality of the scientific information used to support of management decisions. A benchmark assessment is a time and resource-intensive process, particularly for red snapper given the near unrivaled complexity of the assessment. This assessment was on a tight and ultimately unrealistic timeline due to interest in having annual catch limit increases in place in 2013. While we sympathize with the desire to increase the allowable catch, the tight timeline allowed no room for

⁴ GMFMC June Briefing Book Tab B, No. 4(b). Standing and Special Reef Fish SSC Meeting Summary, Tampa, Florida May 29-31, 2013.

unexpected – but inevitable – delays in the process. When such delays did occur and it became clear well in advance of the scheduled review workshop (RW) that there would be no final product to review, the workshop should have been postponed. Instead, reviewers from the Center of Independent Experts (CIE) assembled only to find that the assessment review panel “... could not either accept or reject the findings of this assessment... due to the timeline on which the assessment material was provided to the RW Panel, the adequacy of the documentation, and the completeness of the assessment at the end of the RW.”⁵

In addition, the rigid timeline for completion precluded exploration of key modeling and uncertainty issues, as laid out by the CIE reviewers, including:

- The effects on assessment results of uncertainty in the stock recruitment relationship, and
- The ability to fully characterize the main sources of uncertainty in the assessment as well as the projections, including the effect of unvalidated assumptions regarding key assessment parameters.^{6,7,8}

The review panel was unanimous in that this was not a shortcoming of the analytical team but of the process itself. Ultimately, this had a direct, negative impact on the quality of the best scientific information available and on the quality of the SEDAR process as a whole. In order to avoid repeating the SEDAR 31 process issues, we strongly encourage the Council and the SEDAR steering committee to work with the SEFSC to set accurate and realistic timelines for stock assessments to ensure the quality of the scientific product that reaches the Council.

The ACL setting process for red snapper

We recommend that the Council initiate an amendment to determine appropriate and realistic annual catch specification procedures and evaluate the ability of the fishery-science-management system in the Gulf of Mexico to properly support annual assessment updates for high priority species.

We remain concerned that the Council continues to request annual SEFSC re-run the yield projections with updated landings data for several species, including red snapper that are outside of the approved SEDAR assessment process. As we have previously pointed out, updating landings data only without also updating the other assessment data time series (such as indices of abundance and age data) is a risky practice because landings data alone do not allow the inference of population biomass and abundance trends. The Council’s SSC has also repeatedly

⁵ SEDAR 31. 2013. Red Snapper Review Panel Report and Assessment Addendum. June GMFMC Briefing Book Tab B, No. 4(a).

⁶ Gibson Reviewer Report to the Center for Independent Experts on the Red Snapper Review Workshop (SEDAR 31) held April 29-May 3, 2013 in Gulfport, Mississippi.

⁷ Maguire Reviewer Report to the Center for Independent Experts on the Red Snapper Review Workshop (SEDAR 31) held April 29-May 3, 2013 in Gulfport, Mississippi.

⁸ Nielsen Reviewer Report to the Center for Independent Experts on the Red Snapper Review Workshop (SEDAR 31) held April 29-May 3, 2013 in Gulfport, Mississippi.

cautioned against this practice.⁹ This *de-facto* method for setting ACLs is not established anywhere in a fishery management plan or the Councils Standard Operating Procedures. As such, it is an inappropriate and *ad hoc* methodology, both because the process has not been publically scoped, reviewed, and approved, and because it interrupts the functioning and work planning abilities of the Southeast Fisheries Science Center, preventing the Science Center from being able to complete other, much-needed analyses such proper construction of probability density functions (see discussion above under “the ABC control rule”). The Council should initiate an amendment to determine appropriate and realistic annual catch specification procedures. This process should evaluate the ability of the fishery-science-management system in the Gulf of Mexico to properly support annual assessment updates for high priority species and should include description of the necessary data and analytical tools necessary to support the annual specification process and potential funding sources for these needs such a restoration.

Sincerely,



Elizabeth H Fetherston
Deputy Director, Fish Conservation
Ocean Conservancy



Claudia Friess
Fisheries Scientist
Ocean Conservancy

⁹ For example see GMFMC February 2011 Meeting Briefing Book Tab B, No. 3, and GMFMC February 2012 Meeting Briefing Book Tab B, No. 3(b).

Appendix

The data in the following tables were provided by Brian Linton (formerly SEFSC) on June 13 and 14, 2013. The 2009 Update dead discards come from the October 2012 projection update of the 2009 Gulf of Mexico red snapper update assessment. SEDAR 31 dead discards come from the base model of the SEDAR 31 Gulf of Mexico red snapper assessment. Closed season commercial discards from the SEDAR 31 base model runs were based on commercial trips with no IFQ allocation. In the 2009 update, commercial and recreational closed season discards were combined in a single closed season discard fleet so it is not possible to compare projected against estimated dead discards for the commercial closed season.

Table 1. Dead discards in thousands of fish projected from the 2009 Gulf of Mexico red snapper update assessment and predicted dead discards from the SEDAR 31 Gulf red snapper assessment for the Eastern Gulf.

	Open Season				Closed Season		
	Commercial		Recreational		All Sectors	Commercial	Recreational
Year	09 Update	SEDAR 31	09 Update	SEDAR 31	09 Update	SEDAR 31	
2009	58.6	270.5	223.6	197.5	171.9	412.0	106.2
2010	21.8	356.9	98.6	63.6	214.3	27.6	98.5
2011	32.9	357.9	125.5	75.0	214.9	87.8	117.2

Table 2. Dead discards in thousands of fish projected from the 2009 Gulf of Mexico red snapper update assessment and predicted dead discards from the SEDAR 31 Gulf red snapper assessment for the Western Gulf.

	Open Season				Closed Season		
	Commercial		Recreational		All Sectors	Commercial	Recreational
Year	09 Update	SEDAR 31	09 Update	SEDAR 31	09 Update	SEDAR 31	
2009	129.4	89.7	142.7	18.2	118.1	0.2	18.1
2010	76.1	85.9	84.5	5.8	131.2	2.5	3.0
2011	139.2	86.5	145.0	8.8	137.9	0.9	19.5

Table 3. Dead discards as estimated by SEDAR 31 for the Eastern Gulf.

Year	Open Season				Closed Season			
	Commercial		Recreational		Commercial		Recreational	
	Metric tons	Pounds	Metric tons	Pounds	Metric tons	Pounds	Metric tons	Pounds
2009	344.1	758,670	95.8	211,307	653.8	1,441,412	88.3	194,770
2010	528.5	1,165,132	32.2	70,893	48.6	107,234	98.0	216,078
2011	605.4	1,334,727	49.2	108,363	175.0	385,895	146.7	323,364

Table 4. Dead discards estimated by SEDAR 31 for the Western Gulf.

Year	Open Season				Closed Season			
	Commercial		Recreational		Commercial		Recreational	
	Metric tons	Pounds	Metric tons	Pounds	Metric tons	Pounds	Metric tons	Pounds
2009	88.3	194,569	7.9	17,494	0.5	1,081	21.4	47,144
2010	99.4	219,236	2.1	4,597	7.4	16,396	3.9	8,510
2011	99.6	219,637	3.4	7,575	3.1	6,726	25.7	56,758

From: [Mobile Alerts](#)
To: [Gulf Council](#)
Subject: New message from your mobile website, 03609da.mynetworksolutions.mobi
Date: Sunday, June 09, 2013 11:15:11 PM

Subject: Current regulations On grouper and snapper and Seatrout
Message: I am concerned with the long closure of gag grouper And red snapper. Why am I not allowed to take two gag groupers year-round as opposed to commercial fishermen having quotas In the thousands to millions of pounds .The fisheries went too quickly from a five fish limit to two fish then closed seasons. As far as red snapper, 20 years ago there was almost no red snapper From the middle grounds south. Now they are almost over abundant In these areas Any fishermen would tell you that. Your assessments are very in accurate as far as the numbers of gag grouper and red snapper in the gulf. And now Seatrout which were overfished before the net ban the early 90s have a commercial status. We all know in the state of Florida Seatrout cannot sustain a commercial fishery. Their habitat is limited to the few fragile grass beds along the intercoastal waterways. I know this email will not make you or any other fisheries departments change their policies but they are facts. Fishing i
n the gu
If is very cyclonic there are years when the Grouper and snapper are very abundant and there is years when they Seem hard to find. But over all you cannot blame recreational fishing ! Red tides,weather and commercial fisheries have more of an impact on the fisheries of all these species!!!
Email: rickh1353@yahoo.com
Phone: 7276562616

From: [Whitaker, Jason Mr ARMY GUEST USN USAASC USA](#)
To: [Gulf Council](#); roy.crabtree@noaa.gov
Subject: red snapper season = 4 Saturdays
Date: Thursday, June 06, 2013 8:11:01 PM

In a snapper season that includes only 4 Saturdays, the first 2 have been unfishable due to rough seas. Due to work and church obligations, I will not make a single snapper trip this year. Red snapper is my favorite fish and is the main reason I own a boat. This is extremely frustrating. Anything we can do to extend the snapper season is worth pursuing.

--

Jason Whitaker
Engility Corporation
850-912-9484
jason.whitaker5@dco.mil



June 6, 2013

Chairman Doug Boyd
Gulf of Mexico Fishery Management Council
2203 North Lois Avenue, Suite 1100
Tampa, Florida 33607 Phone: 813-348-1630
Fax: (813) 348-1711

Dear Chairman Boyd:

Please accept the following comments from the Recreational Fishing Alliance Forgotten Coast Chapter (RFA Forgotten Coast Chapter) regarding the release of SEDAR 31 and necessary action items for the June 2013 Gulf of Mexico Fishery Management Council (Council) meeting. Though not accepted or rejected in the Review Panel Report, the SEDAR 31 report continues to support strong and continued growth of the Gulf of Mexico Red Snapper resource. A consistent trend of rebuilding as reflected through both total biomass and spawning stock biomass increases can be indisputably observed since the 1980's. Corresponding declines in fishing mortality can also be observed throughout this time series.

While the continued rebuilding of the Gulf of Mexico red snapper can be described as a conservation success, the increased availability of red snapper, particularly to the recreational sector, is proving to be a significant management challenge. Moreover, density dependant factors are becoming increasing important factor in achieving rebuilding objectives of the Reef Fish fishery management plan. The RFA Forgotten Coast Chapter hopes the Gulf Council takes swift and decisive action to confront these challenges and offers the following recommendations.

Move Toward Regional Management for Gulf of Mexico Red Snapper

The findings of SEDAR 31 continue to support a two-stock model for the Gulf of Mexico red snapper. Observations in genetic testing, otolith micro-constituent analysis and life history characteristics clearly indicate distinctions between red snapper found in the eastern and western regions of the Gulf. Based on these findings and varying needs of the fishing communities throughout the Gulf, the RFA Forgotten Chapter encourages of the Gulf Council to finish voting on regional management at the June meeting in Pensacola, FL. It is important that implementation begin immediately for regional management; this would also include the rescinding of Amendment 30B.

Revisit Commercial/Recreational Allocation

Successful rebuilding of the Gulf of Mexico red snapper fishery has afforded a 9.3-million pound quota for both the commercial and recreational sectors under the original 51%-49% allocation scheme. The RFA Forgotten Coast Chapter supports revisiting this allocation scheme; as the red snapper stock(s) continue to rebuild, there have been numerous statements made on-record by commercial representatives about the drop in market price for red snapper when the commercial quota exceeds 5 million pounds.

Recreational Fishing Alliance Forgotten Coast Chapter
311 Nutmeg St, Port St Joe, FL 32456
www.joinrfa.com

Considering the 51/49 allocation and the market loss experienced by the commercial fishing industry when more than 5 million pounds of red snapper floods the consumer market, the RFA Forgotten Coast Chapter would ask that the commercial sector be capped at the 5-million pound mark, and that all harvest above that threshold be allocated based on an allocation scheme that sets 90% of the quota to the recreational sector and 10% to the commercial sector.

The two tiered allocation approach will allow the commercial/recreational allocation to gradually shift toward the recreational sector as the stock rebuilds. Such an approach would protect the commercial sector from potential overages in the recreational sector while providing a mechanism that will address the growing concern about increased availability causing ever decreasing recreational red snapper seasons.

Setting Recreational Regulations

RFA Forgotten Coast Chapter encourages the Gulf Council to set the recreational seasons at least 1 year in advance. This would provide some stability in the recreational red snapper fishery. SEDAR 31 projects that stock levels will go down over the next few years as the strong 2004, 2005, and 2006 year classes move out of the fishery. Long-term projections generated in SEDAR 31 however show continued long-term growth and rebuilding even without the influence of those strong year classes and with only average recruitment.

That is why we believe the Council should avoid managing the recreational sector in an impulsive, yo-yo manner that is tied to the year-to-year stock level. As the stock continues to rebuild, growth will not be in a straight line but the overall trend will be in an upward direction. The overall health of the recreational red snapper fishery is dependent upon stable and predictable regulations.

The RFA Forgotten Coast Chapter also encourages the Gulf Council to schedule an assessment update for red snapper in 2014 – obviously, a full stock assessment in 2014 would be preferable. The amount of new artificial reefs going out yearly and especially with BP restore money should help increase essential fish habitat for red snapper and will increase populations immensely. This mitigation could dampen stock level declines.

Oil Rig Removal

SEDAR 31 indicates that density dependant factors are impacting the speed at which red snapper in the Gulf of Mexico rebuild. Predation and habitat are the two most important density dependant factors limiting red snapper rebuilding. Active reef building efforts throughout the Gulf continue to supply more available habitat for red snapper thereby increasing growth and overall stock productivity by reducing competition for habitat. Yet, removal of decommissioned oil rigs with explosives destroys red snapper habitat and kills fish.

RFA Forgotten Coast Chapter encourages the Council to request a status report from NOAA Fisheries on their evaluation of establishing oil rigs as essential fish habitat as defined under Magnuson. There is no question that oil rig removal with the use of explosives is having a negative impact on red snapper rebuilding. Even if the impact is minor, the Gulf Council should

pursue all options to stop this action because it is an avoidable and unnecessary source of mortality on red snapper and red snapper habitat.

It is important for the Council to include investigation into the magnitude of mortality associated with rig removal using explosives in the statement of work for the 2014 assessment update.

Until we can get the Magnuson-Stevens Act sensibly and responsibly amended on behalf of both the fish and our fishermen, our only hope is for better stock assessments (more frequent assessments as planned now for 2014), improved recreational data collection, regional management implemented at this meeting (including rescinding 30b), and to get the allocation right where the recreational charter for-hire and headboat sectors are once again fishing and supporting our coastal economies. RFA Forgotten Chapter believes these items must be the priority for the Council at their June 2013 meeting. These items must be discussed and voted on. All other items such as headboats exempted special permits, sector separation, for-hire days at sea, intersector trading and the likes can be postponed to future meetings if necessary.

It's time to prioritize, and it's imperative that members of the Gulf Council get these things finished –accomplish something, stop working on the same things over and over and adding more tasks to the agenda without finishing one damn thing. Please finish voting on these four critically important items at this next meeting in Pensacola.

Respectfully submitted,

Tom Adams

From: [deepangler](#)
To: [Gulf Council](#)
Subject: Red Snapper Season - Update
Date: Tuesday, June 04, 2013 3:46:50 PM

June 1st was a blow out. We did get out and fished Sunday the 2nd of June SW of Sarasota FL. Fished 158 to 162 feet (55 mile run for us). We caught 10 Red Snapper (5 anglers) for the day and kept all 10 as they were all legal size. The largest fish for the day was 29 inches. Average size was 22 to 23 inches. Also kept 13 Red Grouper and 3 Scamp Grouper. June 3rd thru June 8th will be a blow out. We hope to fish either June 9 or June 11 which will be the second trip of the year.

On a side note of the four boats we talked when we got back two of the four got their limit and two did not.

Photo of my son (age 16) attached, feel free to use it if you'd like.

Jeff Berman
Sarasota, FL.