



January 25, 2017

Mr. Leanne Bosarge, Chairwoman
Gulf of Mexico Fishery Management Council
2203 North Lois Ave
Tampa, FL 33607

Dear Chairwoman Bosarge,

The Charter Fisherman's Association is the largest federally permitted charter for-hire organization in the region. Our organization is focused on working respectfully within the fishery management process toward realistic solutions to problems facing the recreational fishery and charter for hire industry. We appreciate the opportunity to provide input and comments on a variety of fishery issues before the Gulf Council:

Modifications to Generic Charter Vessel and Headboat Reporting Requirements

First, it is finally time for the council to finalize and implement the modifications to charter vessel and headboat reporting requirements. Electronic logbook reporting has been a priority within the charter boat industry for many years and the opportunity to improve data timeliness and the quality of data while also building stakeholder buy-in is much appreciated. The electronic reporting program should include hail-out/hail-in provisions for both charter and headboats, prior to returning to the dock via a NMFS approved reporting device with minimum archival GPS permanently affixed to the vessel. ***This would be accomplished through the current preferred alternatives: Action 1-alternative 4, Action 2-alternative 4, Action 3-alternatives 2 and 3, Action 4- alternative 2.***

Amendment 41 and Amendment 41 - Charter and Headboat Management

Following the October Gulf Council meeting, there were some differences identified between the charter and headboat management amendments that needed to be addressed before moving forward. The primary differences were in species composition and development/implementation timelines. These were discussed at great length in the joint CFH/Headboat Advisory Panel meeting by members of a broad panel; but through these discussions, the group was able to develop and arrive at a few very good consensus statements. The Charter Fisherman's Association

supports moving forward with 2 multi-species, allocation based management amendments to be passed and implemented at the same time. Council staff needs direction from the council to move forward with development of both amendments according to the AP consensus statements for further discussion at the April council meeting. ***Next steps for Amendment 41 should include conversion of the program to include not only red snapper, but gray triggerfish, greater amberjack, gag grouper and red grouper, consistent with Amendment 42.*** The Council and NMFS staff also presented, at the joint AP meeting, ideas for “cyclic redistribution” of shares that are not used initially being allocated, to make sure fish ultimately go to those who are actively fishing as charter for-hire operators. The panel seemed very interested in this strategy, ***and we recommend “cyclic redistribution” as outlined by staff should be included in the Amendment 41 document for further analysis and consideration. We encourage the Council staff to work with NMFS to develop a suite of alternatives that address the details of how this redistribution could be operationalized.***

Carryover Provision for Unharvested Recreational Red Snapper ACL

Over the past few meetings, there has been discussion on a carryover provision of unharvested red snapper ACL to the following year to provide relief and access to the recreational fishery. While this is an excellent idea in principle, the council should proceed with caution throughout the development process to ensure accomplishment of the desired outcome. The current structure of the recreational fishery allows for two subsectors operating under combined accountability measures; in other words, accountability measures triggered by one subsector have consequences for both subsectors. In order to achieve an appropriate carryover provision, ***CFA recommends the council develop and pursue implementation of subsector-specific accountability measures for each segment of the recreational fishery.*** According to the latest landings data, and data since Amendment 40, the charter for-hire component has been held consistently and significantly within its portion of the ACL while the private angler component has significantly exceeded its portion of the ACL, despite being held to the same accountability measures. Implementation of any carryover provision, without the use of subsector-specific accountability, would allow for de facto reallocation to the private angler component causing undue economic harm to federal permitted charter for-hire businesses.

Amendment 46 - Gray Triggerfish Rebuilding Plan

Despite the current 2017 season closure for gray triggerfish, we look forward to working with the council to getting this critical species back on track for rebuilding; enabling us to offer these fish to charter for-hire customers to harvest again in the near future. ***The current preferred alternatives and management measures, albeit delayed in implementation, are encouraging and should provide increased***

opportunity for harvest with reasonable confidence to ensure rebuilding the stock as required under the Magnuson Stevens Act (MSA).

Amendment 47 - Modify Vermillion Snapper ACLs and MSY Proxy

In the process of ACL adjustments and establishment of proxies for rebuilding for vermillion snapper in Amendment 47, ***CFA would like to express support in moving forward with a constant catch yield stream in Action 2.*** Additionally, CFA would like further discussion and explanation of the expected impacts to season lengths within the recreational fishery for vermillion snapper as this amendment progresses. It is critically important to charter for-hire businesses that reasonable regulatory certainty and business planning opportunities be made available our businesses.

Thank you for your consideration of these comments.

A handwritten signature in black ink, appearing to read "Shane Cantrell". The signature is fluid and cursive, with the first name "Shane" and last name "Cantrell" clearly distinguishable.

Shane Cantrell
Executive director, Charter Fisherman's Association