

June 20, 2013

Gulf of Mexico Fishery Management Council  
2203 N Lois Avenue, Suite 1100  
Tampa, Florida 33607 USA

Mr. Chairman and Members of the Council:

Thank you for considering these comments on behalf of Fish for America. We are an organization committed to providing safe and healthy seafood to millions of American consumers. We are an industry that is beginning to realize the very real benefits of sustainability. We are highly accountable to all stakeholders of Gulf resources! We are pioneering the traceability of every pound of our harvest from the Gulf to the plate.

Our comments today are specific to the Scoping Document for Amendment #28 and the apparent lack of guidance and rationale for the proposed actions. More specifically, we consider the Council's Guidelines for Allocation and seek to call into question the Council's motivations for even considering such a poorly justified public policy action.

The Scoping Document offers two reasons for proposing Amendment #28; a requisite five year review of FMP allocations and the tenuous conclusion of the Carter/Agar papers that small reallocations MAY be warranted in the reef fish complex. The Scoping Document does not, however, offer any other social or economic rationale for moving forward, nor does it offer any clear objectives that reallocation seeks to achieve and analyses to quantify the effects. This is in direct contradiction of the Council's own Guidelines 2(b) and (d).

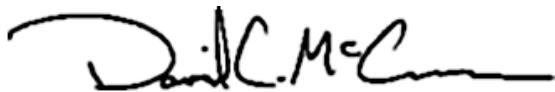
Item 1.C(2) is probably the strongest indictment of the current proposed action on reallocation; "Allocation shall...consider efficient utilization of fishery resources, but **prohibit measures that have economic allocation as its sole purpose.**" If the Council is unwilling to consider additional accountability measures and request NMFS to conduct other socioeconomic analyses, then this guideline alone should result in the immediate demise of the Amendment #28 process.

The current state of the recreational fishery should also preclude moving forward with this amendment. Guideline 2(f) states "Indirect changes in allocation, i.e., shifts in allocation resulting from management measures, should be avoided or minimized to the extent possible". The recreational sector has overfished their annual allocation fourteen of the past twenty-two years; most dramatically, by double their allocation in the early 1990's and most recently, by one-and-a-half times. Speaking strictly in terms of reallocation of commercial quota to the recreational fishery, and **if** the TAC were not exceeded, the 2009 season represented an effective allocation ratio of 7% commercial to 93% recreational. Did that huge indirect reallocation improve the recreational fishing experience? Season length has dropped 86% in six years to a low of 27 days scheduled for 2013.

Item #3, Suggested Methods for Determining (Re)Allocation identifies twenty-three potential mechanisms for implementing and determining the efficacy of a reallocation action; however, the Council seems justified in analyzing only two of these mechanisms (historical landings and net benefits to the nation) in moving forward with Amendment #28. The structure of this proposed amendment and the rest of the Council's agenda effectively rule out the possibility of considering fish tags, sector separation, measures for recreational accountability or any of a dozen other economic criteria which are ALL clearly articulated in the Council's Guidelines for Allocation.

While the Council may feel obligated to address allocation issues, and is being subjected to an extraordinary campaign by a recreational advocacy group, Amendment #28 as outlined in the Scoping Document is bad public policy and a profound disservice to the commercial, charter/headboat and recreational constituents who all deserve better adherence to TACs and a better quality fishing experience; NOT allocation for the sake of allocation.

Thank you,

A handwritten signature in black ink, appearing to read "David C. McCarron". The signature is fluid and cursive, with a large initial "D" and "M".

David McCarron, Fisheries Economist  
On behalf of Fish for America

June 20, 2013

Gulf of Mexico Fishery Management Council  
2203 N Lois Avenue, Suite 1100  
Tampa, Florida 33607 USA

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- The recreational sector has overfished their annual allocation fourteen of the past twenty-two years; most dramatically, by double their allocation in the early 1990's and most recently, by one-and-a-half times.
- Speaking strictly in terms of reallocation of commercial quota to the recreational fishery, and **if** the TAC were not exceeded, the 2009 season represented an effective allocation ratio of 7% commercial to 93% recreational.

- Has the recreational fishing experience improved? Season length has dropped 86% in six years to a low of 27 days scheduled for 2013.

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Thank you,  
Dave McCarron  
On behalf of  
Fish for America

# chefs collaborative

local. sustainable. delicious.

June 19, 2013

Doug Gregory, Executive Director  
Doug Boyd, Council Chair  
Gulf of Mexico Fishery Management Council  
2203 N Lois Avenue  
Suite 1100  
Tampa, Florida 33607 USA

Dear Doug:

Chefs Collaborative, a national network of chefs promoting sustainable practices in restaurants and foodservice, is working with Fish for America, a consumer protection campaign by commercial fishermen, the seafood industry, and consumers nationwide to preserve our country's supply of U.S. - caught fresh seafood.

We're concerned that Gulf of Mexico fishery managers are considering reducing the amount of wild caught domestic seafood allocated to American consumers. These consumer reductions are not proposed for conservation reasons; it's about who has the right to catch the fish.

As a national chef network concerned about a sustainable food system, well-managed fisheries are crucial. In this case, data collection and enforcement to ensure federal fishing limits are never exceeded, are appropriately portioned, and provide consumer access to domestic, wild-caught seafood all the time.

If there is a problem with the health of the fishery, then additional regulations are necessary. But, if the consumer catch is taken away from commercial fishermen, we all feel the effect – the fishermen, the fishery and restaurants serving U.S. - caught wild seafood.

The responsibility to take care of our fisheries belongs to all of us. But the fisheries belong to everyone and access needs to be allocated fairly.

Sincerely,



Melissa Kogut  
Executive Director



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](http://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





**January 18, 2013**  
**Testimony of the Southeastern Fisheries Association concerning  
the reallocation of Gulf of Mexico red snapper**

Southeastern Fisheries Association Inc. (SFA) is a 501 c 6 non-profit fisheries trade association founded in 1952 in Jacksonville, Florida. The association has over 350 companies and hundreds of fishermen associated with its organization as well as several other trade associations who participate under the SFA umbrella. SFA has active members in every fishery in the southeast and in every sector from harvesters, dockside facilities, processors, distributors and retailers. SFA's purpose is to preserve the fishing industry and its culture in a legal and ethical manner.

SFA proudly acknowledges every commercial fish harvested in Florida and most other Gulf States is required to be recorded on some type of a Trip Ticket showing species, date and location of catch, type of gear and other data points used to manage commercial fishermen. In addition to trip ticket requirements, all wholesale seafood dealers keep federal records showing who they bought the fish from and who they sold it to. It's called "one step forward and one step back" and was implemented under the 2001 Congressional Anti-terrorism Act in order to trace the food supply in the United States. When economists analyze data required from the commercial fishing sector they are using accurate, contemporaneous records to validate how many fish were caught, what they are worth at the dock and throughout the chain of distribution. The trip tickets and other required federal reports are not manipulated. These required records accurately describe the transactions of the harvesting and first receiver sectors of the seafood industry.

Conversely, there are not adequate or contemporaneous catch records for anglers. We are informed a new NOAA system to estimate angler caught fish might improve their database, but we do not believe it will provide adequate empirical data necessary to manage red snapper.

SFA recognizes efforts to reallocate Gulf of Mexico red snapper from the non-boating public, including young, old, male and female consumers who desire heart-healthy local fish and gift them to sport fishermen. Some might view a recent red snapper economic report by NOAA Southeast Science Center as justification for the Gulf Council to take red snapper from accountable fishermen and gift them to unaccountable fishermen. Such a biased, purely political action would be a disservice to fishermen, their communities, consumers and to the nation.

In the second sentence of the Abstract on page one of the Southeast Fisheries Science Center's report entitled, "*Is the 2012 allocation of red snapper in the Gulf of Mexico economically efficient?*" NOAA's Juan J. Agar and David W. Carter clearly write,

“THE MAGNITUDE OF THE REALLOCATION AND THE EXTENT TO WHICH NATIONAL ECONOMIC BENEFITS CAN BE INCREASED CAN ONLY BE CONFIDENTLY DETERMINED WITH ADDITIONAL RESEARCH, IMPROVEMENTS IN THE QUALITY OF EXISTING DATA COLLECTIONS AND NEW DATA COLLECTIONS.”  
(emphasis added)

The authors honestly and clearly acknowledge that lack of additional data makes their Southeast Science Center report less than robust. One thing missing in the Science Center’s report is a discussion on how the questions were posed and recorded for their survey instrument. But even if that information becomes available; there is no way to validate the extent to which national benefits can be determined as affirmed by the authors on page one of Abstract of the report.

SFA hopes NOAA’s policy-makers in Washington, D.C. ask, “Why did the Southeast Science Center report only use dockside value for seafood when we all know the economic impact to the nation reaches its highest level when that seafood is sold several times increasing the value at every stage of the processing and distribution channels?” SFA asks, “What is the true economic value of Gulf of Mexico red snapper from the boat to the throat?”

Any Gulf of Mexico red snapper economic report that compares dockside value of commercially harvested red snapper with every penny an angler spends to catch a red snapper is fatally flawed. There may be economic models that do not use the value of commercial seafood all the way to the consumer, but all models pertaining to fish management must use the commercial value at least through the processing sector, which is still below final value. Using only dockside value to determine the total value of the Gulf of Mexico red snapper commercial fishing industry is disingenuous.

The Southeast Fisheries Science Center used the “willingness to pay (WTP)” methodology for analysis of the Gulf of Mexico red snapper resource. The WTP methodology has some economic basis except for the fact that economic researchers have never discovered how to separate fishing trips from fish caught or how to ensure that respondents are giving honest answers. There is no paper trail for anglers to compare with the paper trail of commercial red snapper harvest. It seems impossible to survey anglers and get a believable answer to the question, “How much are you willing to pay to catch a red snapper?”

A major issue that merits extensive discussion is matching "**ability to pay**" with "**willingness to pay**." WTP methods have been used to ask people about willingness to pay for something they don't plan to use - like a wilderness in Alaska or Fort Jefferson National Park. A big number would evolve if the researcher extrapolated to the entire population - even foreign tourists can provide numbers that get large in aggregate.

WTP methodology, to us, is like a puff of smoke. If people are asked what they would be willing to pay above current costs for another trip, they will reply with a number from zero to something positive. If the folks being surveyed figured out what was going on, the successive answers would probably get smaller.

Fishery economists should ask anglers, "How many red snapper need to be reserved for sport fishing in the Gulf of Mexico to keep you interested in the possibility of catching some?" Suppose that number is five million pounds. That amount is attainable within the near future. NOAA recognizes the red snapper stock is not overfished based on an updated reef fish stock benchmark analysis which should increase the quota. The increased in quota that the Council's Scientific and Statistical Committee allows, must be allocated on an equitable basis to the anglers, charter/party boat fishermen and the commercial sector who provides seafood to people who enjoy eating red snapper even if they have no desire or opportunity to catch one. Every increase in the total allowable catch provides significant economic benefits to the region and the nation.

Willingness to pay - should **not** be an acceptable methodology for gathering data, because it's subjective and not backed up by objective data. The key thing to focus on is how much spending related to sport fishing goes into worker's pockets, not the total amount of economic activity (because much of it can be passing through).

For instance, retail spending is a key sector related to sport fishing. One of the members of SFA's Economic Report Evaluation Committee using 2009 data estimated it takes roughly \$180,000 in retail spending to generate about \$28,000 worth of labor income for retail workers. Yet \$180,000 worth of commercial seafood (in ex-vessel terms) would result in roughly four times more labor income for somebody (fisherman, support sector, etc.) As the fish are sold to processors, distributors, retailers/restaurants and finally to consumers, there is much more value and labor income added. Is this aspect adequately addressed by the NOAA's Gulf of Mexico red snapper economic model? Is there a web site to review this element that SFA feels is critical in determining real value to the economy of the Gulf States?

There are three primary ways to increase the economic activity of a region.

1. Develop/exploit more regional resources.
2. Bring in more money from outside the region (i.e. export more),
3. Increase the multiplier of spending occurring within the region.

Selling fish outside the Gulf of Mexico region is an export which brings in new money. That is how commercial fishing brings in new money. Likewise, a nonresident coming to fish in the sport fishery is similar to an export in that it brings new money into the region. A lot of nonresidents come to the Gulf of Mexico, but how many come specifically to fish offshore? How does the Science Center's report deal with this?

Any assumption regarding a nonresident's intent for coming to the Gulf of Mexico is absolutely crucial. Would the person have still come if not for the fishing? Some come only for the fishing, but we believe most do it as part of a larger itinerary. If researchers make the assumption that most sportsmen come only to fish, and then they use all the travel/lodging/food expenses from their entire visit it greatly inflates the sport fishing expenditures. This leads to a much larger value per pound for sport-caught fish than can be quantified or justified.

Another key assumption is the purchase of a boat. Would that boat have been purchased if there were less fish or less of one particular species? Researchers could address that question by reviewing historical boat registration data from the Gulf States.

They could analyze the total number of sport boats categorized as “offshore sport fishing boats” and then compare that with historical sport fish harvest volume. We believe the number of boats is considerably higher over the past twenty year period, while the harvest volume per boat has gone down dramatically.

If the harvest of red snapper per boat is down while at the same time the number of sport fishing boats has increased: it calls into question the assumption that allocating more red snapper to sport fishermen would generate more boat sales. Sales of big ticket items like boats are important economic drivers, but the assumption that more red snapper for sport fishermen would result in more boat sales needs to be proved with quantifiable scientific data. Many other factors affect boat sales, such as average disposable income, mooring/storage costs, inventory and demographics.

There is a large amount of “leakage” associated with many sport fishing expenditures. It takes a lot of retail sales to generate one job, and the majority of the sport fishing sales likely comes from products imported from outside the region and from foreign nations. SFA suggests researchers investigate assumptions related to key support sectors (i.e. retail, lodging and travel) in economic models that estimate the sport fishing value per pound.

Researchers should investigate the nature of sport expenditures, and make adjustments that account for the magnitude of impact generated by spending assumptions they use in their models. Think about how the money is spent by sport fishermen versus commercial fishermen. What are the differences in terms of how much of the economic activity generated is retained by Gulf of Mexico residents and how much of the spending is “passing through” on previously purchased imported equipment.

One very important fact hardly ever discussed is that the commercial fleet must have a basic harvest volume to exist. There has to be a balance. More red snapper gifted to the sportfishing sector doesn’t mean a proportional increase in jobs. Any allocation decision must weigh the expected additional benefit to industries that benefit from the sport fishing sector that would occur with greater access to red snapper against the possible loss of the commercial red snapper fleet and all the sectors which depend upon it (if allocations are set below the breakeven point for the commercial fleet).

Any economic assessment of the commercial fishing industry should use the value of red snapper through the processing, distribution sector at the very least and preferably through the retail sector. There is significant economic merit in measuring the total retail value of an all American supply chain. This aspect relates to the third method of economic development stated previously: generating economic activity by increasing the economic multiplier. When U.S. consumers buy red snapper harvested from the Gulf of Mexico (instead of imported fish), they increase the economic multiplier. The commercial fishing sector’s economic impact is much larger than the ex-vessel value being used in the Science Center’s Report.

We must preserve and protect the commercial allocation of red snapper for the sake of the fleet and the net economic benefit to the nation.

There is an argument that it's easier to switch species as a sport fisherman than as a commercial fisherman. The costs involved in switching commercial fisheries are significant and access to other fisheries is often limited or not allowed because participation has been capped.

SFA believes economic models currently used are unable to arrive at a reliable assessment of the commercial fishing industry. This is because NOAA researchers are unable or unwilling to allow a price tag on many important aspects of commercial fishing such as cultural and traditional values, which together, affect and influence America's society as much or more than the sport fishing industry.

Imagine that tomorrow all commercial fishing in a given area is stopped. The nation loses the local fish supply to the retail market, fish shops, supermarkets, restaurants, etc. Consumers would have to buy more imported seafood. Such an action creates almost unsolvable social problems with unemployed fishermen – good people who don't render easily to shift to other trades, their families, communities, and many other negative occurrences. And what about all the infrastructure serving commercial fisheries: boat-building and repair, production and marketing of fishing gear, mechanical, electronic, and electric equipment, and more...? Lot of losses (costs) to the society. How many \$\$\$? Plenty.

Imagine that tomorrow all recreational fishing in a given area is stopped? We'll see a lot of angry and frustrated sport fishermen. Most people seeking recreational occupations could move to other water related businesses, but not without great angst and family disruptions. The individual sport fishermen, instead of spending money on fishing tackle and bait might spend it on underwater cameras, binoculars, and plenty of other equipment. They will still be headed to the seashore and all outdoors, staying at hotels and motels, finding other sport-type entertainment, and, as before, spend the money they can afford for recreation. No great loss to the society's purse, just a great loss to the honest businesses who currently serve sport fishing.

The two scenarios show aspects of red snapper reallocation that are easy to overlook or sweep under the table when NOAA and any fishery management council tries to solve complex socio-economic problems with bookkeeper's arithmetic.

SFA opposes both scenarios, but presents them as a hypothetical comparison.

SFA and most citizens believe the Gulf of Mexico red snapper resource belongs to nation, not to any sector that seeks all the red snapper for themselves. The allocation between user groups must be fair and equitable as mandated under the Magnuson-Stevens Act and the United States Constitution.

Sport fishing is an important and major economic driver in the Gulf States, but so is the commercial seafood industry. Southeastern Fisheries Association and the entire commercial fishing industry request a thorough investigation and explanation of key assumptions, primary data, and methods used in the Science Center's economic analysis.

Additionally the commercial fishing industry requests the analysis of commercial fishing in the Gulf of Mexico as well as the South Atlantic Council's region be extended to include the dealers, processors, distributors and retailers who benefit from selling commercially caught red snapper. Less red snapper allocated to the commercial fishing industry has a direct negative impact on these basic economic sectors and the allied industries that support them.

Finally, the southeastern commercial fishing industry requests the council investigate the impact of past allocation decisions on both the sport and commercial fleet. The council must understand that reallocating more red snapper to the sport fleet could have a disproportionately large negative impact on the commercial fleet: whereas the additional benefit to the sport fleet is likely to be marginal so long as other sport fish species are available.

Like other assumptions briefly discussed in this testimony, the expectation that allocation decisions affect the sport and commercial fleet in the same manner needs to be quantified in much more detail.

Respectfully submitted,

*Bob Jones*

Bob Jones, Executive Director  
Southeastern Fisheries Association  
1118-B Thomasville Road  
Tallahassee, Florida 32303  
[www.sfaonline.org](http://www.sfaonline.org)