



UNITED STATES DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
 NATIONAL MARINE FISHERIES SERVICE
 Southeast Regional Office
 263 13th Avenue South
 St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

07/20/2021

F/SER24:PH

006948JULY2021

Carrie Simmons, Ph.D.
 Executive Director
 Gulf of Mexico Fishery Management Council
 4107 West Spruce Street, Suite 200
 Tampa, Florida 33607

Dear Dr. Simmons,

At its April 2021 meeting, the Gulf of Mexico Fishery Management Council (Council) took final action on a Framework Action to the Fishery Management Plan for Reef Fish Resources of the Gulf of Mexico: Modification of Gulf of Mexico Red Snapper Recreational Data Calibration and Recreational Catch Limits (Framework Action). Consistent with standard procedures, staff made the necessary edits to the document and on June 6, 2021, the Southeast Regional Office (SERO) submitted the Framework Action to the Southeast Fisheries Science Center (SEFSC) for review. The SEFSC responded with comments on the Framework Action on June 21, 2021 (attached). One of the comments indicated that Preferred Alternative 2 was not based on the best available science because it delayed the implementation of the calibration methodology until 2023. The SEFSC stated that delaying implementation would result in the private angling component exceeding their annual catch limit in 2022. The SEFSC points out this is “inconsistent with the requirements of the Magnuson-Stevens Fishery Conservation and Management Act.”

The SEFSC made some suggestions to address this comment, but these suggestions are beyond what staff can address without Council input. Because the Council has yet to transmit the Framework Action to SERO for implementation, I request the Council add this to the August 2021 meeting agenda to review and address the SEFSC comment. Thank you for considering this request and I look forward to working with the Council to implement this important framework action.

Sincerely,

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 REW.JAMES.13658 STRELCHECK.ANDREW.JAMES
 63152 :1365863152
 Date: 2021.07.20 14:20:27 -04'00'

Andrew J. Strelcheck
 Acting Regional Administrator

Attachment

cc: Thomas Frazer, Ph.D.





**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric
Administration**

National Marine Fisheries Service
Southeast Fisheries Science Center
75 Virginia Beach Drive
Miami, Florida 33149 U.S.A.
(305) 361-4200 Fax: (305) 361-4499

June 21, 2021

MEMORANDUM TO: Andrew Strelcheck
Acting Regional Administrator, Southeast Regional Office

FROM: Clay Porch
Director, Southeast Fisheries Science Center

SUBJECT: Request for Expedited Review of a Framework Action to the Fishery Management Plan for Reef Fish Resources of the Gulf of Mexico: Modification of Gulf of Mexico Red Snapper Recreational Data Calibration and Recreational Catch Limits (Calibration Framework)

Lisa Desfosse
Digitally signed by Lisa Desfosse
Date: 2021.06.21 10:29:49 -05'00'

The SEFSC has reviewed the Framework Action to the Fishery Management Plan for Reef Fish Resources of the Gulf of Mexico: Modification of Gulf of Mexico Red Snapper Recreational Data Calibration and Recreational Catch Limits and provides the following comments:

Comment 1: Alternative 1 should be explicitly identified as a non-viable option in the same way that alternative 5 has been. As shown in Table 2.1.5 and written in numerous places, both alternatives 1 and 5 are expected to result in the private angling sector continuing to exceed the total ACL indefinitely.

In the discussion of alternative 1 add the underlined to the following sentence:

“This is inconsistent with the requirements of the Magnuson-Stevens Fishery Conservation and Management Act and is therefore not a viable option for management.”

Comment 2. The decision to defer the effective start date for preferred alternative 2 to 1/1/2023, when it could be in place for 2022, is not based on best available science. All other alternatives presented in the framework action can be implemented by 2022 and no definitive justification for the separate treatment of alternative 2 was provided in the discussion of the action. The deferred start date for alternative 2 would, as stated in the document, result in the private sector ACL being exceeded in 2022. This is inconsistent with the requirements of the Magnuson-Stevens Fishery Conservation and Management Act.

The effective date for alternative 2 should be moved to 1/1/2022 and all supporting text should be updated to reflect this change.

Or, if the Council cannot agree to action prior to 2023

The effective dates for all other alternatives (3-5) should be moved to 1/1/2023 and all supporting text should be updated to reflect this change.

Comment 3: Part of the discussion of Alternative 4 appears to be reversed. I think the highlighted portion of the paragraph below should have the a and b options reversed and read as follows:

Option 4a under **Alternative 4** is expected to result in a sufficient reduction in the state-specific ACLs to ensure that the combined state landings for the private angling component do not exceed the private angling component's total ACL. However, **Option 4b** would not apply the ratio calibrations to any subsequent ACL increases less than 25% of the status quo. Therefore, ACL overages may still be possible under **Option 4b**.

As under **Alternative 3**, each state would receive the proportion of the ACL as specified in Amendment 50A. In contrast to **Alternative 3**, **Alternative 4** would adjust any increase in the ACLs (see **Options 4a** and **4b**) to the respective state ACLs using the ratio calibrations described in **Preferred Alternative 2**, as opposed to applying the 23% buffer to those increases as well, as described in **Alternative 3**. **Option 4b** under **Alternative 4** is expected to result in a sufficient reduction in the state-specific ACLs to ensure that the combined state landings for the private angling component do not exceed the private angling component's total ACL. However, **Option 4a** would not apply the ratio calibrations to any subsequent ACL increases less than 25% of the status quo. Therefore, ACL overages may still be possible under **Option 4a**.

cc:

F/SEC – John Walter
F/SEC – Lisa Desfosse
F/SEC – Larry Massey
F/SER – Virginia Fay
F/SER – Heather Blough
F/SER – Richard Fickley
F/SER2 – John McGovern
F/SER24 – Peter Hood
F/SER24 – Dan Luers