



# Gulf of Mexico Fishery Management Council

*Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico*

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Marine Recreational Information Program  
Office of Science and Technology  
NOAA Fisheries Service (National Marine Fisheries Service)  
1315 East-West Hwy, Silver Spring, MD 20910

Dear MRIP Program Coordinator:

Thank you for the opportunity to review the Marine Recreational Information Program (MRIP) Strategic Plan: 2017 – 2022. The Gulf of Mexico Fishery Management Council (Council) is supportive of the initiative to improve recreational fisheries data. The Gulf of Mexico (Gulf) supports the largest recreational fishery in the United States and the Council relies on accurate and timely information to manage fisheries and meet the objectives of the Magnuson – Stevens Fishery Conservation and Management Act (Magnuson – Stevens Act). The purpose of this letter is to respond to the request for comments on this plan to further improve the science and statistics supporting fishery management.

The Council is pleased with ongoing efforts to improve recreational fisheries data, including efforts to improve the Access-Point Angler Intercept Survey, calibrate the new survey with historical data, and improve effort estimates with a new mail-based survey. Despite this progress, several challenges remain in Gulf recreational fisheries. For example, the private recreational red snapper fishing season in the Gulf is extremely short (three days in federal waters in 2017), and the existing protocols are insufficient to characterize catch and effort for this fishery. The Gulf states that participants in MRIP are developing specialized methods for red snapper data collection, and additional outreach and education is necessary to explain the methods, results, and manner with which these data are used. These surveys are of great interest to stakeholders; however, the methods and comparability among states, and between the specialized surveys and MRIP, can be confusing to stakeholders and reduce confidence and compliance with the subsequent regulations.

The 2006 reauthorization of the Magnuson – Stevens Act requires in-season monitoring for species that have exceeded their annual catch limit (ACL) in the most recent fishing year. The timeliness demonstrated by the existing MRIP survey may be inadequate in this context, as data are reported in two month waves with an approximate 45-day delay between the end of the wave and the release of the data. This problem has been exacerbated by ongoing changes in survey design and recalibration, which make projections based on previous catch rates more difficult and with greater uncertainty. The Council feels further guidance and development of best practices on data use, limitations, and communication strategies would aid NMFS and the

Council in their obligations for in-season monitoring for species that have exceeded their ACL in the previous fishing year.

The Strategic Plan outlined the importance of transparency regarding the methods used to estimate catch and effort statistics, with the data ultimately being used to inform ocean policy decisions. However, the Council feels more work must be done in this area, since considerable stakeholder skepticism exists which may be precluding progress. For example, the Council recently convened its Ad Hoc Red Snapper Private Angler Advisory Panel (AP) to discuss management options to increase recreational access to red snapper in federal waters. However, the AP was focused on issues surrounding data collection, estimates of total catch, and biological reference points that reduced progress towards improving management. Though the data generated through MRIP may ultimately inform ocean policy decisions, concerns of stakeholder trust in the data should be of higher concern; if stakeholders do not have confidence in the data used to determine catch levels, then using those data will become exceedingly difficult.

The Council is also aware of ongoing efforts to calibrate historical and current estimates of catch and effort to ensure that the 'units' of ACLs are compatible with the current survey design. The Council understands the incremental approach that is being taken; however, the potential for multiple releases of re-estimated historical harvest data over a period of a few years could further exacerbate stakeholder skepticism of these data. The potential for multiple releases also creates additional complexity for stock assessments, as the magnitude and direction of change in recreational catch and effort estimates is difficult to predict and could have a substantial impact on the stock status, ACLs, and/or subsequent sector allocations for species which were apportioned based on catch history. Typically, historical data are treated with much larger coefficients of variance than more recent data; therefore, it may be more beneficial to focus on the accuracy and timeliness of the data produced today, as opposed to the data produced under a different sampling method decades ago.

The Council looks forward to working with MRIP to improve fisheries management and associated data products. Please contact the Council with any questions concerning these recommendations.

Sincerely,

Leann Bosarge  
Chair, Gulf Council

JF:RR

cc: Council Members  
Council Staff

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Gordon Colvin