

**From:** [Bill Van Deman](#)  
**To:** [Gulf Council](#)  
**Subject:** Reef Fish Advisory Panel Meeting October 2  
**Date:** Monday, October 2, 2023 10:34:38 AM

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Dear esteemed members of the Gulf council,

I wanted to comment on a couple of the items on today's agenda:

### **1. Overestimation of MRIP. "Average Weight spiral"**

I am glad to see you are attempting to reduce the data uncertainty by narrowing the scope of reef fish users from the overall pool of saltwater fishermen.

I also believe one of the fatal and unaddressed flaws of MRIP and your data calculations is flawed reliance on poundage as the primary harvest metric when assessing whether a species is experiencing overfishing or is overfished. As a fish population sees exponential size growth due to increasingly limited harvest windows, the poundage metric is hit so much quicker as average fish size increases and the next season is decreased as well. **This creates a feedback loop** we have seen with red snapper and average fish size. It has been suggested to change the recreational metric from poundage to number of fish when measuring fishing effort (which would eliminate the average fish size increases and year over year discrepancy).

Another new idea to eliminate the effect of increased average fish size would be to divide the TAC or total weight harvested by the average fish size and adjust the net TAC so you have a true comparison year over year when comparing a 1.5 lb red snapper yearly average fifteen years ago and a 10 lb average red snapper today.

From a personal anecdote, I was only able to get in one trip this year for red snapper, and our average size fish was over 12lbs where ten years ago it might have been 2 lbs so I can see this being an issue as you move into both grouper and amberjack closures. Personally, I have seen the number of 32-36" gags increase over the past twenty years due to the shorter seasons and bag limit decrease from 5 to 2 fish that is skewing the weight estimation- because each fish is now larger.

2. Gag grouper- with the hurricane coming at the start of the gag grouper season and conditions and visibility being so poor for the month after opening I don't see how we are hitting the weight metric so early (except that gags are now bigger). We have had three trips for gags as divers and came back with gags only once due to poor conditions and no visibility- only this past weekend.

Also, September and October are not ideal months for gag fishing. We are guaranteed to lose a part of this season due to tropical weather with poor conditions for several days before and possibly weeks after a named storm. I would rather see a shorter season coinciding with better and safer conditions- either May or June or even November when inshore boats and divers have access to more fish.

If there is a flaw in your data collection I would rather have 30 days in a favorable month than 60 days in a bad weather window that are going to get closed anyways until the issues with average fish weight are resolved and the uncertainty from too many non reef fishing fisherman

included in MRIP numbers is reduced in the data collection (which I believe mandatory reporting which you have started today from states would reduce the scope of users just as we have seen with a target reef fish permit, snapper only permit, or reef complex only assessment like the Gulf states do with their narrower and targeted fishery assessment).

A Sufficiently narrowed scope of reef fish users could be figured from extrapolating the number or even % of users registered in state fishery management tools (snapper permits, reef fish permits) measuring this smaller group of reef complex fisherman from the group of saltwater fisherman as a whole.

Sincerely,

Bill Van Deman