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
http://sero.nmfs.noaa.gov

Tab S, No. 1(a)

04/22/2019

F/SER25:FH

Dr. Carrie Simmons, Executive Director
Gulf of Mexico Fishery Management Council
4107 West Spruce Street
Tampa, Florida 33607

Dear Dr. Simmons:

NOAA's National Marine Fisheries Service (NMFS) requests the Gulf of Mexico Fishery Management Council review the enclosed exempted fishing permit (EFP) application at their June 2019 meeting. The proposed EFP application was submitted by Dr. Glenn Parsons of the University of Mississippi. If issued, the EFP would exempt, with certain conditions, the applicant from federal bycatch reduction device (BRD) requirements found at CFR 622.53.

The primary goal of the project is to gauge industry acceptance of the Nested Cylinder BRD (NCBRD). The device has been in development for a number of years, funded through NMFS grant programs. Briefly, the device exploits the natural tendency for fish to swim up-current and to take refuge in reduced-flow areas created by the NCBRD. The NCBRD is sewn into the trawl "bag" downstream of the turtle excluder device (TED). The BRD has a continuous flow-blocking collar which creates a region of reduced flow that attracts fish. This reduced-flow area is adjacent to large mesh netting that encircles the BRD to create escape openings and provides the opportunity for fish to exit the trawl. Two floats attached to the top of the device provide flotation to prevent scuffing on the bottom.

Over the past several years, the NCBRD has been tested on a variety of Gulf of Mexico (Gulf) commercial shrimp vessels contracted for research evaluation off the Texas coast. Successful NMFS at-sea BRD certification trials were completed in December 2016, as prescribed in the BRD Testing Protocol Manual.

Under this EFP, cooperating Gulf shrimp fishermen would be provided a new NCBRD to gauge their acceptance before final administrative certification. The applicant intends to obtain opinions, comments, and suggestions from shrimpers that might encourage them to use the device. To ensure proper use of the NCBRD, the applicant would make site visits to each participant to demonstrate proper installation in the trawl, and request shrimpers use the device for at least 30 trawls during normal fishing operations. Issuance of the EFP would allow fishermen to replace an existing certified BRD with the NCBRD in one outboard net during normal fishing operations, to provide a side-by-side comparison. All trawls under tow during the evaluations must be equipped with approved TEDs.

According to the applicant, during certification trials the device reduced overall finfish bycatch about 44 percent and, perhaps most significant to fishermen, resulted in about 1.8 percent shrimp loss (compared to the fisheye's loss of over 10 percent). It was also significant that in fishery

observer trials (prior to the certification trials) off the coast of Texas, juvenile red snapper bycatch reduction was even higher than overall bycatch reduction (about 50 percent). Utilization of the device by industry could provide conservation benefits to the Gulf.

If you have any questions, please contact Frank Helies at (727) 824-5305 or e-mail at frank.helies@noaa.gov.

Sincerely,

LUGO.LAUREN.B.1365843020 Digitally signed by LUGO.LAUREN.B.1365843020 Date: 2019.04.22 15:53:10 -04'00'

for Roy E. Crabtree, Ph.D.
Regional Administrator

Enclosures