



2/18/22

Peter Hood
Branch Chief
NMFS Southeast Regional Office
263 13th Avenue South
St. Petersburg, FL 33701

Re: Reef Fish Fishery of the Gulf of Mexico, Amendment 53; 86 Fed. Reg. 70078 (Dec. 9, 2021)

Dear Mr. Hood:

The Southeastern Fisheries Association, which represents many sectors of the commercial fisheries industry including but not limited to restaurants, fish houses, processors, fishermen, seafood markets, wholesalers, freight companies and bait suppliers, opposes the proposed Amendment 53, which would reallocate a portion of the red grouper harvest from the commercial sector to the recreational sector. In essence the proposed reallocation is based on the idea that the scientific/statistical underpinnings of the state/federal fisheries management system now in place are more accurate in estimating the mortality attributable to the recreational red grouper fishery than they have been "historically." We must ask why, if the old MRFSS system was so inadequate, was it in use for thirty or so years?

We were provided with copies of J. Timothy Hobbs' (representing A.P. Bell Fish Company, Southern Offshore Fishing Association, and the Gulf of Mexico Reef Fish Shareholders' Alliance) letter to you on January 7, 2022, detailing those organizations' objections to the proposed Amendment 53. Starting with the first sentence of his second paragraph, "*amendment 53 is unlawful and irrational,*" our members agree with him fully. Had we been offered the opportunity we would have enthusiastically signed on to the letter. In his twenty-seven pages he has captured to a T the feelings of the industry members in the Southeastern Fisheries Association, of people in other fisheries and associated businesses, and undoubtedly of the multitude of consumers who do not have the means to either catch their own fish or be restricted to tilapia or swai when they want a seafood dinner. We are confident that if they were offered the same opportunity (and in the case of the non-fishing consumers once the situation was explained to them) they would have signed on as well.

And finally, we must question the tacit fishery management policy that you are once again endorsing here. Isn't it time that NOAA/NMFS as a federal agency grows out of the "*more you catch (or report that you catch), the more you get to catch*" philosophy that you are endorsing for the recreational sector while the commercial sector has fished under tight ACLs and been held fully accountable for years? This goes against the strong conservation ethic that we are repeatedly

Southeastern Fisheries Association, Inc.

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assured motivates a constantly increasing proportion of our recreationally oriented colleagues every year.

Thank you for your attention,

Southeastern Fisheries Association, Inc.
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Hollywood, FL

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