



January 24, 2021

Dr. Tom Frazer, Chairman
Gulf of Mexico Fishery Management Council
4107 West Spruce Street, Suite 200
Tampa, FL 33607

Dear Chairman Frazer,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance, please accept the following comments regarding topics to be discussed at the Gulf of Mexico Fishery Management Council (Gulf Council) webinar meeting this week.

1. Amendment 53

Given the complicated and controversial nature of recalibration and reallocation, the Shareholders' Alliance suggests that the Gulf Council split Amendment 53 into two documents: a framework action to adjust the overfishing limit (OFL) based on SEDAR 61, and an amendment that analyzes red grouper allocations.

- Amendment 53 unnecessarily couples two issues that are unrelated to one another: recalibration and reallocation. Recalibration is a necessary step when new and better data are available. While the new Fishing Effort Survey (FES) is recognized as best scientific information available, calibrating between it and the previously used Coastal Household Telephone Survey (CHTS) does not mandate reallocation. If the Gulf Council wants to tackle reallocation head-on, it should do so explicitly in a follow-on action and follow the guidance of the NOAA and Gulf Council allocation review policies.^{1,2}
- The red grouper stock remains at historic lows, and reallocating quota to the recreational fishery will increase discards and discard mortality across the entire fishery – in 2017, recreational fishermen discarded nearly 1,000% more red grouper than the commercial fishery.³ Amendment 53 confirms that “the magnitude of recreational discards is considerably greater than commercial discards, resulting in additional removals and a lower annual projected yield.”⁴ The full extent of these biological impacts still isn't clear, as an SSC member noted “reservations in describing the revised sector allocations as having used the Best Scientific

¹ Gulf Council. 2019. [Fishery Allocation Review Policy](#).

² NOAA. 2017. National Marine Fisheries Service Policy Directive 01-119. [Fisheries Allocation Review Policy](#).

³ NOAA. January 2020. [Estimating Gulf of Mexico Commercial Discards using Reef Fish Observer Data](#).

⁴ Gulf Council. 2021. [Amendment 53 to the Reef Fish Fishery Management Plan](#).

Information Available without an accompanying analysis of the impact of allocation changes on overall fishing mortality.”⁵

- According to Amendment 53, “The difference in the alternatives is where more fish are allocated to the recreational sector, total landings have to be constrained more to account for the greater dead discards from recreational red grouper fishing.”⁶ This is in direct conflict with Objective 5 of the Reef Fish Fishery Management Plan (FMP) which is “To minimize and reduce dead discards.”
- We also continue to point out the disparate ways in which the Gulf Council is incorporating FES into management. Skepticism is still present within the scientific community about relying on FES for landings and effort estimates for red snapper. Congress has even stepped in, including language in the latest Omnibus Appropriations bill directing the following:

“Therefore, before making any related regulatory changes, NMFS is directed to address the question of which data collection system (i.e., MRIP or the catch data programs administered by the Gulf States) are providing the best estimates of recreational red snapper catch in the Gulf of Mexico.”⁷

Proceeding in different manners for two different stocks in the face of the same problem is inconsistent, arbitrary, and capricious.

2. Amberjack

Management changes to this point have not substantially changed the status of the fishery, and therefore we support the following motion by the SSC:

The SSC accepts SEDAR 70 and recommends the greater amberjack OFL as based on the yield at $F_{SPR30\%}$, and ABC as based on the yield at $F_{Rebuild}$ (by 2027) for 2022-2024:

OFL (mp ww)

2022	1.637
2023	2.223
2024	2.781

ABC (mp ww)

2022	1.255
2023	1.767
2024	2.270

⁵ Standing, Reef Fish, Mackerel, Ecosystem, and Socioeconomic SSC. January 2021. [Webinar Meeting Summary Report](#)

⁶ Gulf Council. 2020. [Amendment 53 to the Reef Fish Fishery Management Plan](#).

⁷ U.S. House of Representatives Document Repository. [Division B – Commerce, Justice, Science, and Related Agencies Appropriations Act, 2021](#).

This is a fishery that continues to fail to meet rebuilding timelines, despite being under a rebuilding plan since 2003⁸ and more research is needed on this stock to gain a better understanding why. We anticipate that the [Greater Amberjack Research Program](#), the funds for which was appropriated by Congress, will play an important role in this understanding. Even with more data, alternative management tools and strategies may need to be explored.

3. Sector Separation

We support the Gulf Council exploring Sector Separation for other species. The benefits of this program for red snapper are clear, and we believe that an analysis should be conducted to see if similar benefits can be achieved for other species. The charter/for-hire sector is fundamentally different than the private angler sector and sector separation allows each individual sector to tailor management plans to meet the needs of their distinct population. We look forward to seeing the results of this work.

4. Commercial Electronic Logbooks (ELBs)

We ask that the Gulf Council initiate an Amendment to develop a commercial electronic logbook program. Commercial reef fish fishermen are eager for reporting to join the digital age and move away from archaic paper and pencil reporting. We applaud the launch of the Southeast For-Hire Integrated Electronic Reporting (SEFHIER) program - this is a huge step forward for this industry and will generate better, more real-time data for managers. We hope that we can follow this process and do the same thing for commercial reef fish fishermen. We look forward to working with Gulf Council members and staff on next steps in response to the presentation from the Southeastern Fisheries Science Center in October 2020.⁹ We remain dedicated and ready to help the Gulf Council with outreach and feedback opportunities from the industry on this important topic.

5. Red Drum Assessment

The Shareholders' Alliance requests the Gulf Council consider adding red drum as a research priority and explore funding options for an assessment. Harvest in the Gulf of Mexico Exclusive Economic Zone has been closed since 1988 and anecdotal accounts in public testimony suggest that the population has increased. The last assessment was SEDAR 49 in 2016, which included the following research recommendation:

*Increase offshore sampling across the entire GOM, especially at the individual school level, for biological samples (e.g., meristics, otoliths, reproductive tissues, fin clips). We recommend purse seine as the least size-selective sampling gear for this species in offshore waters.*¹⁰

The presentation from Dr. Simmons and Dr. Porch appears to address this recommendation and close some of the data gaps for red drum.

⁸ Gulf Council 2002. [Secretarial Amendment 2 to the Reef Fish Fishery Management Plan to Set Greater Amberjack Sustainable Fisheries Act Targets and Thresholds and to Set a Rebuilding Plan](#).

⁹ Brown, J. and Pierce, B. August 2020. [SEFSC Commercial Electronic Logbook Project](#).

¹⁰ SEDAR 49. [Gulf of Mexico Data-Limited Species](#).

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Eric Brazier". The signature is written in a cursive style with a large, stylized "E" and "B".

Eric Brazier

Deputy Director, Gulf of Mexico Reef Fish Shareholders' Alliance
eric@shareholdersalliance.org