

Summary of Public Comment January 19, 2021

Framework Action: Red Snapper Recreational Data Calibration and Recreational Catch Limits

Summary of Written Public Comment

17 comments were received.

- The implications of calibrating FES data back in time are huge and we need to take a step back and allow independent experts to review the whole calibration process.
- The red snapper fishery is healthy. The recreational season should be extended.
- Concerns for the lack of standardized data collections systems for each state under State Management have been realized. The appropriate ACL adjustments need to be made to ensure that overharvest doesn't happen.
- Texas should be held to the same standard as the other states who have to make ACL adjustments.
- Support for sound data collection and adhering to catch limits to ensure we continue to rebuild the red snapper stock and grow the recreational season. Overages in the recreational sector could impact anglers in other states and sectors. Implement state calibrations as soon as possible.
- There is both a scientific and legal need for calibration. Comparison of state-survey landings with and MRIP-based ACL is statistically indefensible. If calibration does not occur now, the OFL will need to be reduced after the net assessment and this will negatively impact all sectors.
- Using applied calibration ratios, if each sector lands its ACL OFL will be exceeded by millions of pounds. This is a direct violation of the MSA prohibition on overfishing.
- Calibrating now is the best way to reduce the severity of paybacks later.
- Defining a strategy and timeline for managing private recreational red snapper with 'common currency' is imperative to the long-term viability of Amendment 50.
- Allocating each state a portion of the private recreational red snapper ACL using federally collected data ("federal currency") while using state data programs ("state currency") to monitor in-season harvest will likely lead to systemic underreporting of harvest if they are not calibrated to a common currency.
- Lack of calibrations to state survey landings in the private angler component has caused red snapper to undergo overfishing for the first time in over a decade.
- Amendment 50 requires paybacks to revised ACL's and state ACLs must be calibrated to bring Amendment 50 into compliance with MSA.
- The process for modification of state surveys, adjustment of calibrations, and integration of state survey data should be transparently developed.
- The Gulf Council should quickly advance the framework action to define recreational red snapper data calibrations and set catch limits. Given that private angler mismanagement (like the 2019 Texas overage and anticipated resulting overfishing designation) has very real implications for commercial fishermen, so the Gulf Council

should move forward a plan that has the strongest chance of preventing recreational overages once and for all.

- Overfishing occurred in 2019. State management is failing and continues to lack the accountability needed to keep the private recreational fishing component under its ACL due to a lack of calibration to a common currency. The failure to calibrate data has caused red snapper to undergo overfishing for the first time in over a decade, which will have ramifications affecting all sectors.
- Although the preliminary results of the Great Red Snapper Count suggest greater biomass of red snapper, many questions remain unanswered about how these new data change our understanding of the stock, for instance, they may suggest that the stock is less productive than previously thought. Most importantly, regardless of the results of the Great Red Snapper Count and potential impacts to management advice, without a common currency, Amendment 50 continues to violate federal law.
- The Council should adopt the SSC recommended simple-ratio calibrations and use the resulting common currency to end overfishing and set legally-compliant ACLs for the 2021 season. This is the only solution which incorporates state surveys to fix the critical flaws in Amendment 50. The Council and NMFS have sanctioned 3 years of unaccountable catch by the private recreational sector and are running out of time to solve this issue for the 2021 season.
- The Council should move quickly on Alternative 2 in action One in the framework action to 'Adjust State Recreational Red Snapper Catch Limits' so that when more fish do come we are ready with calibrated quotas to end the overrun of the subsector allocation in the private recreational sector.
- The Council should post for final action the framework amendment to address state-by-state calibrations. Time is running out to take action on this important issue before the 2021 season.