

**Reef Fish Committee Report
January 28 – 29, 2025
Dr. Thomas Frazer – Chair**

The Committee adopted the agenda (**Tab B, No. 1**) and the minutes (**Tab B, No. 2**) from the November 2024 meeting were approved as written.

Draft: Reef Fish Amendment 58B: Modifications to Deep-water Grouper Management Measures (Tab B, Nos. 4a - b)

Council staff presented updated management alternatives for modifying the deep-water grouper (DWG) complex, in light of recent stock assessment advice. Management alternatives for DWG include specifying status determination criteria, catch limits, sector allocations, and accountability measures (AM). Additional alternatives were added by the Council to actions covering sector allocations and accountability measures at the November 2024 meeting.

NOAA General Counsel expressed some concern about the proposed AM allowing overages in two consecutive years under Alternative 5 in Action 3. It was suggested to add language to ensure that annual monitoring of the catch was still occurring. A Committee member commented that in-season AMs would be highly uncertain and suggested focusing more on overages of the complex ACL.

Capt. Dylan Hubbard (Reef Fish Advisory Panel [RFAP] Chair) reviewed the recommendations from the RFAP, which recommended removal of the 4% buffer between the commercial ACL and commercial quota, and to support Alternative 5 in Action 3. Regarding the commercial buffer, the RFAP thought that the removal of flexibility measures between the DWG and Other Shallow-Water Grouper (SWG) complexes removed the necessity for the 4% buffer. Regarding Alternative 5 in Action 3, the RFAP thought that due to the uncertainty in the recreational data, a more flexible AM would better address potential overages of the recreational ACL.

A Committee member asked if the change in the MSY proxy from $F_{30\%SPR}$ to $F_{40\%SPR}$ proposed in Alternative 2 in Action 1 was the driver for SEDAR 85 estimating yellowedge grouper as undergoing overfishing as of 2021. Council staff highlighted the late age at which 50% of yellowedge grouper females are sexually mature (9 years) and the maximum age (85 years), both of which are thought to be the oldest of Gulf of Mexico (Gulf) federally managed species. Further, recent recruitment has been below average, and recent landings have also been decreasing. The Southeast Fisheries Science Center (SEFSC) echoed these characteristics and thought deviating from the Scientific and Statistical Committee's (SSC) recommendation of using $F_{40\%SPR}$ for DWG would require considerable scientific rationale. A Committee member thought using $F_{40\%SPR}$ was likely appropriate for DWG, but was concerned about its use for many other species without careful consideration.

A Committee member voiced support for Alternative 4 in Action 2, which applies an equal reduction in recent landings for both the commercial and recreational sectors based on average sector landings from 2019 – 2023. Another Committee member thought Alternatives 2 – 4 in

Action 2 provided a reasonable range for consideration. They added that Alternatives 5 and 6 could be removed since they include a time period during which the individual fishing quota (IFQ) program was not in effect. The Committee thought it important to be considerate of this management bias when evaluating allocation options.

The Committee recommends, and I so **move**, in **Action 2**, to move Alternatives 5 and 6 to the Considered but Rejected Appendix.

Alternative 5: The complex ACL is set equal to the complex ABC. Establish a recreational ACL and sector allocation based on the average landings from the recreational and commercial sectors from 2001 – 2004 (see Table 1.1.2). This results in a recreational ACL of 31,026 lb gw, or 5.59% of the complex ACL. The commercial sector is allocated 94.41% of the complex ACL, or 524,000 lb gw. The commercial quota is reduced from the commercial ACL by 4% and is set at 503,040 lb gw. The recreational and commercial ACLs sum to equal the DWG complex ACL. These values are shown in the table below in lb gw.

Complex	Year	OFL	ABC (Complex ACL)	Comm ACL	Comm Quota	Rec ACL
DWG	2025-2029+	731,035	555,026	524,000	503,040	31,026

Alternative 6: The complex ACL is set equal to the complex ABC. Establish a recreational ACL and sector allocation based on the average landings from the recreational and commercial sectors from 2000 – 2023 (see Table 1.1.2). This results in a recreational ACL of 32,747 lb gw, or approximately 5.90% of the complex ACL. The commercial sector is allocated approximately 94.10% of the complex ACL, or 522,279 lb gw. The commercial quota is reduced from the commercial ACL by 4% and is set at 501,388 lb gw. The recreational and commercial ACLs sum to equal the DWG complex ACL. These values are shown in the table below in lb gw.

Complex	Year	OFL	ABC (Complex ACL)	Comm ACL	Comm Quota	Rec ACL
DWG	2025-2029+	731,035	555,026	522,279	501,388	32,747

Motion carried with no opposition.

A Committee member agreed that an in-season AM for the DWG complex was unreasonable. With regard to a multi-year AM approach, the Committee member proposed adding an alternative that would monitor recreational landings over a rolling three-year period to determine whether the average recreational landings within that rolling period exceeded the recreational

ACL. If so, the Regional Administrator would adjust the recreational fishing season as necessary to ensure that the recreational ACL is not exceeded in the following three-year period. Another Committee member noted that this proposal allows for consideration of multiple years of landings, but could be strongly influenced by a single year of high landings. A recommendation to tie any adjustment to the recreational fishing season duration in subsequent years to the best scientific information available was proposed, and the Committee thought this condition was important given recreational landings uncertainty and updates to catch limits via stock assessments. NOAA General Counsel replied that NOAA Fisheries already must use the best scientific information available when performing season duration projections. Further discussion of this condition highlighted past circumstances with other species where NOAA Fisheries reconsidered the use of some landings data based on the uncertainty surrounding those data.

The Committee recommends, and I so **move, to add a new Alternative to Action 3:**

Alternative: For the recreational sector, if the average deep-water grouper landings exceed the average ACL over a three-year moving period, the Regional Administrator would reduce the length of the recreational season by the amount necessary to ensure that the recreational ACL is not exceeded during the following fishing year unless BSIA suggests no adjustment to the fishing season is necessary.

Motion carried with no opposition.

The Committee recommends, and I so **move, to move Alternative 3 to the Considered but Rejected Appendix.**

Alternative 3: Establish in-season recreational AMs for the DWG complex. For the recreational sector, if the recreational ACL is projected to be met in a fishing year, then the Regional Administrator would close the recreational sector for the DWG complex for the remainder of that fishing year.

Motion carried with no opposition.

A Committee member asked if it was reasonable to consider the complex ACL, instead of just the recreational ACL, in the newly proposed alternative. The Committee agreed to discuss this further at Full Council. Council staff discussed the plan to take this document out to public hearings after approval by the Council. To facilitate planning of these hearings, staff requested discussion of preferred locations of these meetings during full Council.

Draft Framework: Other Shallow-water Grouper Catch Limits (Tab B, Nos. 5a and 4a)

Council staff reviewed the actions and alternatives in the Other Shallow-water Grouper (Other SWG) Framework Action (Tab B, No. 5). A Committee member inquired how the Council's motion to use a proxy for maximum sustainable yield (MSY) of $F_{SPR30\%}$ was integrated into the Other SWG Framework Action. Council staff responded that the Council's motion would be

integrated into Reef Fish Amendment 58A, whereas this framework action is intended to be a short-term solution focusing on the use of landings. Staff added that a smaller reduction than 54.7% of recent landings could be used in Action 1, which could mimic the use of a 30% SPR proxy for MSY. A Committee member responded that an arbitrary number may not be ideal. Staff agreed that the 54.7% reduction is the most defensible number to use at this time. Staff added that a letter had been sent to the SEFSC requesting updated landings and rerunning projections for scamp and yellowmouth using the 30% SPR proxy and to present those projections to the SSC.

Capt. Hubbard reviewed the RFAP's motions for both Reef Fish Amendment 58A and the Other SWG Framework Action from its December 2024 meeting. He noted that, for Action 1 in the framework action, the RFAP recommended Alternative 2 as the preferred. A Committee member noted that, for Action 2, the open season in Alternative 2 aligns with the open season for red snapper, whereas the open season in Alternative 3 aligns with the open season for gag grouper. He added that red snapper is targeted Gulf-wide, whereas gag grouper is targeted more with Florida fishermen. Capt. Hubbard stated that the conversation revolved more around scamp and greater amberjack, rather than scamp and gag. Another Committee member inquired if there was any discussion on in-season monitoring. Capt. Hubbard responded that the RFAP discussed how recreational landings and in-season monitoring is very difficult, due to the delay in MRIP-FES data reporting; the AP also expressed continued concern regarding the reliability of the MRIP-FES landings estimates.

A Committee member stated that Action 1, Alternative 2 is not as extreme a reduction in landings as some of the other alternatives and acknowledged that it aligns with the AP's recommendation for a preferred. A Committee member added that the reductions in Action 1 are meant to be a short-term solution while work is completed on Reef Fish Amendment 58A. The SEFSC noted that recruitment is down for scamp and yellowmouth grouper, and is in part, responsible for the reduction in catch limits.

A Committee member stated that a June 1st open date in Action 2 would be ideal for Louisiana. Another Committee member commented that aligning open seasons with data collection would be helpful. The Committee agreed to further discuss this action after hearing public testimony.

Presentation: Modifications to Lane Snapper Minimum Size and Recreational Bag Limits (Tab B. Nos. 6a-b and 4a)

Staff presented the proposed modifications to lane snapper minimum size and recreational bag limit action alternatives and analyses. A Committee member stated that from a biological standpoint Action 1 Alternative 2, a 10-inch minimum size limit, is reasonable given length at maturity, and it would also achieve the goal of reducing landings slightly and maintaining a year-round fishing season. Another Committee member echoed that moving forward with Action 1 Alternative 2 would achieve the Council's intent. Additionally, the Committee was not interested in including lane snapper in the 10-snapper aggregate bag limit. A Committee member inquired about the timeline moving forward, and staff reiterated that if the Council selects a preferred alternative at this meeting, the Council may take final action in April 2025.

Draft: Reef Fish Amendment 59: Requirements for Participation in Individual Fishing Quota Programs (Tab B, No. 7)

Staff gave a presentation on Amendment 59, which addresses participation requirements in the red snapper and grouper/tilefish IFQ programs. Participation requirements include ownership of valid or renewable commercial reef fish permits and mandatory landings of preset percentages of annual allocations held in shareholders' accounts.

In Action 1 (Requirements to Open and Maintain Shareholder Accounts), Committee members noted that Alternative 2 would restore participation requirements that were in effect at the inception of the IFQ programs.

In Action 2 (Active Participation Requirements for Shareholders), a Committee member asked whether the owner of a shareholder account could become non-compliant by selling a certain percentage of their annual allocation. Staff replied that an owner who harvested less than the minimum required during the first year could become non-compliant by selling their shares in the second year. Staff noted that Alternative 6 does not include a preset minimum percentage of annual allocation to be landed. Staff indicated that Action 3 addresses requirements to obtain and maintain IFQ shares while Action 4 sets requirements to obtain annual allocation.

In Action 5 (Divestment from Non-compliant Shareholder Accounts), a Committee member asked whether NOAA would have sufficient time to reclaim shares from non-compliant accounts and redistribute them before the beginning of the next fishing year. Southeast Regional Office (SERO) staff replied that non-compliant accounts would be flagged, and NOAA Fisheries would notify the shareholder during the time interval between non-compliance and divestment. A Committee member noted that the Ad Hoc IFQ Advisory Panel was scheduled to meet in March 2025, and would provide feedback on this amendment during the April 2025 Council meeting.

The Committee indicated that participation criteria other than landing a minimum percentage of a shareholder's annual allocation may be considered. A Committee member suggested moving Action 2 to a separate amendment to explore alternative active participation requirements and streamline the development of the remainder of Amendment 59. Some Committee members expressed support for the suggestion and emphasized the importance of implementing permit requirements in a timely manner. Some Committee members expressed opposition to removing Action 2 from Amendment 59 and noted that active participation requirements are an essential part of this amendment. A Committee member suggested that permit requirements alone may not be enough to achieve the purpose for this amendment. Committee members indicated that removing Action 2 could result in unintended consequences. Committee members indicated that regardless of the decision made relative to Action 2, the actions and range of alternatives to consider in Amendment 59 must be finalized to further develop the amendment.

Summary: December 2024 Gulf SSC Webinar (Tab B, Nos. 8-8a)

Dr. Mike Allen (SSC Chair) reviewed remaining SSC recommendations from the SSC's December 5, 2024, webinar meeting. Dr. Allen reviewed the SSC's discussion of a management strategy evaluation (MSE) for black grouper commissioned by the Florida Fish and Wildlife Conservation Commission (FWC). The SSC also received a progress update on the SEDAR 88 stock assessment of Gulf red grouper from the SEFSC and offered recommendations about specific aspects of the proposed base model. The SSC expects to review the final SEDAR 88 assessment during its February 2025 meeting in Tampa, Florida.

A Committee member asked about the platoon approach, and whether it was based on lengths from fishery-dependent or -independent sources. Dr. Allen said the source would depend on the available data and was designed to track a cohort of recruits by length and apply variable degrees of selectivity to that cohort over time based on growth rate. The approach is a more discrete method of determining length-based selectivity and retention. Another Committee member noted that the assessment was age-based, and also asked about the amount of biological sampling that would be required to implement the platoon approach. The SEFSC replied that larger sample sizes of the same data which are already collected can be used to allow for a more fine-scale examination of selectivity and retention patterns for a subject cohort through time.

Summary of Reef Fish Advisory Panel Discussions and Recommendations (Tab B, No. 4a)

Capt. Dylan Hubbard RFAP Chair and Council staff reviewed the remaining recommendations from the RFAP meeting held on December 3, 2024.

Regarding consideration of the removal of the 20-fathom shallow-water grouper closure, Capt. Hubbard said that adherence to this regulation is uncommon in the opinion of the RFAP. However, the RFAP ultimately recommended pausing work on this framework action until after the review of the SEDAR 88 stock assessment for red grouper. The RFAP was concerned that removal of the rule now would result in a reduction in the recreational red grouper fishing season without more current data.

The RFAP also recommended a modification to the lane snapper interim analysis approach. The current approach uses the catch-per-unit-effort from the headboat fleet, which is constrained by the ACL and the composition of the headboat fleet. Instead, the RFAP proposed considering updating the lane snapper IA with the G-FISHER composite video index for future catch limit modifications. A Committee motion was offered, but later withdrawn pending further discussion at full Council.

Recreational Initiative (Tab B, Nos. 10a and b)

Dr. Willy Goldsmith and Mr. Andy Loftus provided an update on the Council's Recreational Initiative, summarizing progress from two Working Group meetings held in October 2024 in

Tampa, Florida, and January 2025 in New Orleans, Louisiana. Council staff reviewed feedback on the Recreational Initiative received during two public engagement sessions, followed by insights from Recreational Working Group member Robert Hilliard.

A Committee member asked for more clarification on the idea proposed by the Working Group of flexible regulations across different areas in Florida for red and gag grouper. Mr. Hilliard explained that since 95% of gag are caught in Florida waters, regional management makes more sense than a Gulf-wide approach. Council staff added that Working Group discussions about gag management focused on two considerations: increasing angler satisfaction in states where gag is not a primary target by allowing a year-round one-fish-per-vessel limit, and spatial management in Florida based on biomass and fisher density/anticipated effort.

A Committee member expressed concern over the inclusion of harvest tags as a potential alternative management approach in the agenda for the third and final Recreational Initiative Working Group meeting. They questioned whether introducing harvest tags at this stage was appropriate and suggesting that it might have been better suited for an earlier meeting. Dr. Goldsmith clarified that the first two meetings focused on identifying challenges and conceptual issues, while this meeting was structured to start addressing solutions. Council staff added that harvest tags are just one of many alternative strategies that will be presented, and that the intention is to provide a broad range of options, not guide the group toward any single approach.

A Committee member noted concerns about trust in the decision-making process and asked how it could be strengthened. Mr. Hilliard responded that much of the necessary information to educate anglers is already available, but not widely shared. The Committee member suggested that the Outreach & Education Technical Committee should review potential solutions to improve transparency.

A Committee member raised the potential role of carry-over provisions in management, highlighting the trade-offs between value and precision and the need for the Recreational Initiative to consider them. They also inquired whether optimum yield (OY) was included in the Recreational Initiative's discussions. Council staff responded that while an OY discussion was originally planned, it was omitted due to time constraints and the fact that it had been previously discussed at the 2024 National Saltwater Recreational Fishing Summit, but could be revisited in a future meeting.

The SEFSC noted that many ideas discussed align with existing efforts in the South Atlantic region, including a 15-fish aggregate bag limit and angler satisfaction surveys. The SEFSC also referenced an ongoing South Atlantic MSE for snapper and grouper species, which could inform the Council's approach. Social scientists at the SEFSC are focusing on evaluating the economic and psychological benefits of recreational fishing beyond traditional yield-based measures and are also reconsidering how to adapt the science process to better inform management.

A Committee member emphasized that any recommended management strategies should account for the effort, time, and funding required for implementation. Dr. Goldsmith confirmed that Day 2 of the third Working Group meeting would focus on assessing feasibility, importance, and

urgency of proposed solutions. The SEFSC discussed the SEDAR Steering Committee's approach to incorporating interim analyses and warned that accelerating the process could reduce inclusivity and transparency. It was suggested that the Council will need to determine the minimum level of SSC review and public webinars necessary for these analyses.

A Committee member suggested finding ways to encourage anglers to provide more timely and accurate data. Another Committee member referenced exempted fishing permits in the South Atlantic and an app developed for direct angler reporting as examples of encouraging anglers to self-report. SERO acknowledged that data reliability and trust are recurring concerns and suggested testing a pilot program to address these issues.

Council staff noted that a special comment session will be held in April 2025 to review the outcomes of the Recreational Initiative.

Presentation: Recreational Red Snapper Accountability Measures (Tab B, No. 11)

Staff summarized recreational red snapper AMs, and state-specific landings, allowable catch limits (ACL), and overages since Reef Fish Amendment 50A was implemented in 2020. A Committee member asked whether the for-hire ACL overages affect the private angling ACL, and staff replied that they do not. Gulf-state representatives on the Committee contributed to a discussion related to additional flexibility measures within the AMs. The following are points in which these Committee members generally agreed, though further clarification and discussion is warranted:

- AMs should be tied to the private angling ACL (in CHTS units) and should not include the federally permitted charter for-hire fleet.
- Consider a mechanism to allow for individual Gulf states to transfer any underutilized portion of its private angling ACL within a single fishing year to another Gulf state.
- Consider a mechanism to allow for individual Gulf states to carry over any underutilized portion of its private angling ACL within a single fishing year to be added to its ACL in the following fishing year.
- Consider a mechanism to prevent individual Gulf states from repeatedly exceeding their private angling ACL to prevent abuse of any flexibility structure.

NOAA General Counsel highlighted that the proposed flexibilities may be incorporated through enforcement of a modified AM or have a more prescriptive structure to allow for flexibility. A Committee member suggested the process outlined in the South Atlantic Fishery Management Council's Coastal Migratory Pelagic Amendment 20B be referenced as an example of inter-state red snapper quota trading. It was suggested also that the Council should determine the structure in which identified flexibility measures would be implemented.

A Committee member highlighted that appropriate guard rails are essential to ensure flexibility measures function as intended. Some potential considerations for guard rails include provisions to reduce successive and/or frequent overages. A Committee member mentioned that the health of the stock should be taken into consideration when considering the potential allocation of carry-over. Further discussion of these concepts will continue at full Council.

Other Business

SERO Update on 2024 Recreational Gag Landings

SERO reported on recreational gag landings for the 2024 fishing season, which totaled approximately 270,000 lb, with approximately 160,000 lb attributed to the State Reef Fish Survey (private angling landings from Florida). Based on these data, the recreational ACL would have been exceeded in 2024 by approximately 100,000 lb. The 2025 recreational ACL for gag is set to be 399,000 lb, and the ACT 319,000 lb. Preliminarily, after the application of the overage, the adjusted 2025 recreational ACT for gag would be approximately 219,000 lb. FWC staff will continue to work with SERO staff to finalize these numbers.

Mr. Chair, this concludes my report.