

Modification to the Recreational For-hire Red Snapper Fishing Season



Final Abbreviated Framework Action under the Fishery Management Plan for the Reef Fish Resources of the Gulf

Including Regulatory Impact Review and Regulatory Flexibility Analysis

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ABBREVIATIONS USED IN THIS DOCUMENT

Abbreviation	Definition
ACL	annual catch limit
ACT	annual catch target
CS	consumer surplus
Council	Gulf Council
E.O.	Executive Order
EEZ	exclusive economic zone
GDP	gross domestic product
Gulf	Gulf of America
IRFA	Initial Regulatory Flexibility Analysis
Magnuson-Stevens Act	Magnuson-Stevens Fishery Conservation and Management Act
MD	Memorial Day
NMFS	National Marine Fisheries Service
PS	producer surplus
Reef Fish FMP	Fishery Management Plan for the Reef Fish Resources in the Gulf
RFA	Regulatory Flexibility Act
RIR	Regulatory Impact Review
SBA	Small Business Administration
SEFSC	Southeast Fisheries Science Center
SRHS	Southeast Region Headboat Survey
TNR	trip net revenue
TPWD	Texas Parks and Wildlife Department
ww	whole weight

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CHAPTER 1. INTRODUCTION

1.1 Background

This framework action is being developed in response to public comment received by the Gulf Council (Council) during 2024. These comments indicated a desire to change the opening date of the federal for-hire recreational fishing season for red snapper in the Gulf of America (Gulf). The season currently starts on June 1 of each year, and the end date is determined based on when the National Marine Fisheries Service (NMFS) projects that landings will reach the federal for-hire annual catch target (ACT). If, after red snapper landings from the federal for-hire component are estimated, the ACT has not been met, then the NMFS may reopen the fishing season later in the fishing year to allow the federal for-hire component to reach its ACT (GMFMC 2019).

In 2015, through Amendment 40 to the Fishery Management Plan for the Reef Fish Resources of the Gulf (Reef Fish FMP) (GMFMC 2014), the Council established private angling and federal for-hire components of the recreational sector. The private angling component is composed of anglers fishing from privately owned and rental vessels, and for-hire vessels that do not have a federal Gulf reef fish charter vessel/headboat permit (for-hire permit). The federal for-hire component is composed of for-hire vessels with a valid or renewable federal for-hire permit. The recreational red snapper annual catch limit (ACL) is split such that the private angling component is allocated 57.7% and the federal for-hire component is allocated 42.3%. Because this framework action focuses on the federal for-hire component, further discussion of the private angling component will be limited.

Landings for the for-hire component of the recreational sector from 2018 – 2024 are shown in Table 1.1.1. Private angling landings are as reported by the respective Gulf states for 2018 – 2022, and as calibrated to the Marine Recreational Information Program Coastal Household Telephone Survey for 2023 (GMFMC 2021¹). From 2018 – 2022, no accepted calibration ratio to convert state data collection program reported landings to MRIP existed; therefore, for those years, the private angling landings were uncalibrated, or simply, “as reported”. Beginning in 2023, accepted calibration ratios by state were used to convert state data collection program reported landings to MRIP. Season durations from 2015 – 2024 are shown in Table 1.1.2. These data are constrained to these years because they represent the years during which the private vessel and for-hire components of the recreational sector were managed separately. This separation has demonstrably affected both the landings and the fishing season durations of these respective components.

¹ https://gulf-council-media.s3.amazonaws.com/uploads/2025/03/Modification-of-Red-Snapper-ACLs-06222021_post_SEFSC_Review_508_Final-1.pdf/

Table 1.1.1. Red snapper for-hire and private angling landings and ACLs. Landings and catch limits are in pounds ww.

Year	Federal For-Hire Landings	For-hire ACT	For-Hire ACL	% ACT Landed	% ACL Landed	Private Angling Landings	Total Rec ACL	%Rec ACL Landed
2018	2,441,612	2,280,000	2,848,000	107.09%	85.73%	4,116,945	6,733,000	97.41%
2019	2,558,734	2,848,000	3,130,000	89.84%	81.75%	3,768,651	7,399,000	85.52%
2020	2,376,679	2,848,000	3,130,000	83.45%	75.93%	3,768,094	7,399,000	83.05%
2021	2,301,439	2,848,000	3,130,000	80.81%	73.53%	4,284,611	7,399,000	89.01%
2022	2,836,877	2,848,000	3,130,000	99.61%	90.64%	3,119,070	7,546,000	78.93%
2023	2,989,919	3,076,322	3,380,574	97.19%	88.44%	4,595,543	7,991,900	94.91%
2024	2,228,863	3,076,322	3,380,574	72.45%	65.93%	3,228,834	7,991,900	68.29%

Source: Recreational component landings are from the SEFSC Recreational ACL File and Council State Landings Record (last accessed July 17, 2025). Landings include data from MRIP CHTS, Southeast Region Headboat Survey (SRHS), Florida State Reef Fish Survey, Alabama Department of Natural Resources, Mississippi Department of Marine Resources, LA Creel, and Texas Parks and Wildlife Department. The private angling component was managed under exempted fishing permits (EFPs) by the individual Gulf states for the 2018 and 2019 fishing seasons.

Table 1.1.2. Red snapper federal for-hire recreational season durations (in days) and ACLs/ACTs from 2015 - 2024.

Recreational For-Hire Fishing Season				
Year	ACL	ACT	Closure	Days open
2015*	2,279,970 after Am 40 then 2,964,000 after Framework	1,824,000 after Am 40 then 2,371,000 after Framework	7/15/2015	44
2016	2,893,000 then 3,042,000	2,315,000 then 2,434,000	7/17/2016	46
2017**	2,993,000 then 2,848,000	2,395,000 then 2,278,000	7/20/2017	49
2018***	2,848,000	2,278,000	7/22/2018	51
2019***	3,130,000	2,848,000	8/2/2019	62
2020	3,130,000	2,848,000	8/2/2020	62
2021	3,130,000	2,848,000	8/3/2021; reopen 9/15/2021; reclose 11/6/2021	84 (63 + 21)
2022	3,130,000	2,848,000	8/19/2022	79
2023	3,191,958	2,904,862	8/25/2023	85
2024	3,380,574	3,076,322	8/28/2024	88

* 2015 marks the first year where the federal for-hire and private angling components were managed under separate catch limits.

** The 2017 red snapper fishing season for private anglers was extended by 39 days on June 6, 2017, by the Secretary of Commerce.

*** The 2018 and 2019 fishing seasons for private anglers were managed under EFPs for each Gulf state.

Modification of the Recreational For-Hire Fishing Season

Amendment 40 to the Reef Fish FMP (GMFMC 2014) set the for-hire component fishing season to begin on June 1 and end when the for-hire ACT is projected to be met. Since implementation of the June 1 for-hire season opening in 2015, the season duration has doubled (44 days in 2015 to 88 days in 2024). This has caused an extension of the season ending date from July 15 in 2015 to August 28 in 2024. Fishery stakeholders have expressed concern that extending the season into September or further could result in difficulty in filling vessel bookings with paying customers in the late summer and early fall, as those are typically slower times of year for for-hire fishing. Alternatively, opening the fishing season earlier in the year (i.e., May) could allow for-hire operators to take advantage of available fishing days during times of year when filling bookings is demonstrably easier. Further, at present, for-hire fishing trips occurring in May would be during a time when other species commonly caught with red snapper would also be expected to be open to harvest, including red grouper and gray triggerfish.

1.2 Purpose and Need

The purpose of this framework action is to modify the fishing season for the federal for-hire component for red snapper to allow greater recreational access while continuing to constrain landings to the component ACL, as well as the total recreational ACL.

The need for this framework action is to allow the federal for-hire component more opportunity to harvest red snapper at a level consistent with achieving optimum yield for the recreational sector in the long-term while preventing overfishing on an annual basis, and while rebuilding the red snapper stock.

1.3 Management Options

Preferred Option 1: Modify the federal for-hire component fishing season for red snapper. The fishing season opens on the Friday before the Memorial Day (MD) Federal Holiday and closes when the for-hire component ACT is projected to be met, or on December 31, whichever occurs first.

Option 2: Modify the federal for-hire component fishing season for red snapper. The fishing season opens on May 15 and closes when the for-hire component ACT is projected to be met, or on December 31, whichever occurs first.

1.3.1 Discussion and Rationale for Preferred Option

Both options would modify the opening date of the federal for-hire component fishing season. **Preferred Option 1** would open the season on the Friday before the MD Federal Holiday while **Option 2** would open the season on May 15. Both **Preferred Option 1** and **Option 2** would allow the opportunity to harvest red snapper along with other commonly targeted species that are usually open in May like red grouper and gray triggerfish, with **Option 2** providing a greater number of days of overlap.

Further, the earlier the season opens, the earlier it would close based on when the ACT is projected to be met. Table 1.3.1 below shows the projected fishing season durations for the two management options as well as the status quo. An estimate of daily catch was derived from the mean of the total red snapper for-hire landings from the 2021 – 2023 for-hire fishing seasons, divided by the fishing season duration in days. These years were selected for analysis because they represent the most recent and complete three years of available data. This daily catch estimate (in lb ww) was then divided into the for-hire ACT to determine the number of days estimated to harvest that ACT. These fishing season durations were then used to calculate the date on which the fishing season would close. For reference, under **Preferred Option 1**, the earliest possible start date in May in any future year would be May 22. For this reason, Table 1.3.1 projects forward from May 22; if the Friday before MD occurs later in May, the season end date would be later in August.

Table 1.3.1. Red snapper for-hire fishing season duration projections for alternatives in Action 1. ACLs and ACTs are in lb ww. Daily catch is expressed as lb ww per day. The range of closure dates for Alternative 2 are italicized because it depends on the actual date of the Friday before MD.

	For-hire ACL	For-hire ACT	Daily Catch in lb ww (2021-2023)	# Days Open (ACT/Daily Catch)	Season Closes:
Status Quo June 1	3,380,574	3,076,322	33,816	91	31-Aug
Preferred Option 1: Friday pre-MD	3,380,574	3,076,322	33,816	91	<i>21-27 Aug</i>
Option 2: May 15	3,380,574	3,076,322	33,816	91	14-Aug

1.3.2 Council Conclusions

The Council considered the purpose of the regulations to be modified and determined that modifying the federal for-hire fishing season for red snapper to begin on the Friday before the Federal MD Holiday in May would result in several positive effects for the federal for-hire fleet. These effects include a preferable fishing season duration which does not extend beyond the end of August and coincides with peak times for booking for-hire fishing trips, and the overlap of the open red snapper fishing season with the open fishing seasons of other popular target species, such as gray triggerfish and red grouper, which are often caught on red snapper directed fishing trips.

CHAPTER 2. REGULATORY IMPACT REVIEW

2.1 Introduction

The National Marine Fisheries Service (NMFS) requires a Regulatory Impact Review (RIR) for all regulatory actions that are of public interest. The RIR does three things: 1) it provides a comprehensive review of the level and incidence of impacts associated with a proposed or final regulatory action; 2) it provides a review of the problems and policy objectives prompting the regulatory proposals and an evaluation of the major alternatives that could be used to solve the problem; and 3) it ensures that the regulatory agency systematically and comprehensively considers all available alternatives so that the public welfare can be enhanced in the most efficient and cost-effective way. The RIR also serves as the basis for determining whether the proposed regulations are a "significant regulatory action" under the criteria provided in Executive Order (E.O.) 12866.

2.2 Problems and Objectives

The problems and objectives addressed by this action are discussed in Section 1.2.

2.3 Description of the Fishery

This amendment would only impact the for-hire component of the Gulf of America (Gulf) reef fish fishery, and thus, that is the only component addressed in this section. The for-hire mode component of the recreational sector is composed of charter vessels and headboats (also called party boats). Charter vessels generally carry fewer passengers and charge a fee on an entire vessel basis, whereas headboats carry more passengers and payment is per person. The type of service, from a vessel- or passenger-size perspective, affects the flexibility to search different fishing locations during the course of a trip and target different species because larger concentrations of fish are required to satisfy larger groups of anglers.

Permits

For anglers to fish for or possess reef fish species in or from the Gulf exclusive economic zone (EEZ) on for-hire vessels, those vessels are required to have a Gulf charter/headboat permit for reef fish (Gulf reef fish for-hire permit). The total number of valid or renewable Gulf reef fish for-hire permits remained constant from 2020 to 2021, then steadily decreased from 2022-2024, with an overall reduction of approximately 2% (Table 2.3.1).

Table 2.3.1. Number of for-hire vessels (charter and headboat) that held a Gulf reef fish for-hire permit by vessel homeport state.

Year	AL	FL	LA	MS	TX	Non-Gulf	Total
2020	145	803	111	29	194	12	1,294
2021	155	805	111	24	188	11	1,294
2022	157	818	99	22	177	11	1,284
2023	160	818	86	24	172	12	1,272
2024	154	818	83	25	174	11	1,265
Average	154	812	98	25	181	11	1,282

Source: NMFS SERO.

Note: Includes RCG and HRCG permitted vessels.

Although the permit application collects information on the primary method of operation, the permit itself does not identify the permitted vessel as either a headboat or a charter vessel, and vessels may operate in both capacities. However, if a vessel meets the selection criteria used by the Southeast Region Headboat Survey (SRHS) and is selected to report by the Science Research Director of the Southeast Fisheries Science Center (SEFSC), it is determined to operate primarily as a headboat and is required to submit harvest and effort information to the SRHS. During 2024, 73 Gulf headboats were registered in the SRHS (R. Cheshire, NMFS SEFSC, pers. comm. 2025). The majority of these headboats were located in Florida (44), followed by Texas (18), Alabama (7), and Mississippi/Louisiana (4).

Angler Effort

Recreational effort estimates derived from the Marine Recreational Information Program database can be characterized in terms of the number of trips as follows:

- Target effort - The number of individual angler trips, regardless of duration, where the intercepted angler indicated that the species or a species in the species group was targeted as either the first or the second primary target for the trip. The species did not have to be caught.
- Catch effort - The number of individual angler trips, regardless of duration and target intent, where the individual species or a species in the species group was caught. The fish did not have to be kept.
- Total recreational trips - The total estimated number of recreational trips in the Gulf, regardless of target intent or catch success.

A target trip may be considered an angler's revealed preference for a certain species, and thus may carry more relevant information when assessing the economic effects of regulations on the subject species than the other two measures of recreational effort. Given the subject nature of this action, the following discussion focuses on charter mode target trips for red snapper in the Gulf. Data from MRIP, the Louisiana Department of Wildlife and Fisheries Recreational Creel Survey, and the Texas Parks and Wildlife Department (TPWD) Marine Sport-Harvest Monitoring Program were used to generate these estimates.

Florida and Alabama recorded the most target trips for red snapper from 2020 through 2024, followed by Louisiana, Texas, and Mississippi (Table 2.3.2). Target effort for red snapper on charter trips climbed steadily from 2020-2023, then dipped in 2024. Approximately 85% of this effort occurred in federal waters (Table 2.3.2). May and June consistently saw the greatest number of charter mode red snapper target trips in federal waters each year, with the exception of 2024 when the peak occurred in July and August (Figure 2.3.1).

Table 2.3.2. Gulf charter mode red snapper recreational target trips by state, year, and area fished.

	Alabama	Florida	Louisiana	Mississippi	Texas	Total
Federal Waters						
2020	33,567	70,026	4,577	1,657	1,813	111,640
2021	41,413	58,765	6,342	567	3,337	110,423
2022	38,788	82,821	3,471	0	2,881	127,960
2023	57,992	102,568	6,629	1,325	3,411	171,925
2024	49,973	92,574	5,025	378	5,722	153,672
Average	44,347	81,351	5,209	785	3,433	135,124
State Waters						
2020	524	17,124	507	0	379	18,534
2021	1,124	27,831	1,740	0	420	31,115
2022	823	16,092	2,446	328	2,442	22,130
2023	947	25,972	2,382	0	1,209	30,510
2024	538	12,048	2,611	0	1,658	16,855
Average	791	19,813	1,937	66	1,222	23,829
All Waters						
2020	34,091	87,150	5,084	1,657	2,192	130,174
2021	42,537	86,596	8,082	567	3,757	141,538
2022	39,610	98,913	5,917	328	5,323	150,091
2023	58,939	128,540	9,011	1,325	4,619	202,435
2024	50,511	104,622	7,636	378	7,380	170,527
Average	45,138	101,164	7,146	851	4,654	158,953

Source: MRIP database, SERO, NMFS (April 2026) for AL, FL and MS; LDWF Recreational Creel Survey for LA; TPWD Marine Sport-Harvest Monitoring Program for TX.

Note: Headboat information is unavailable.

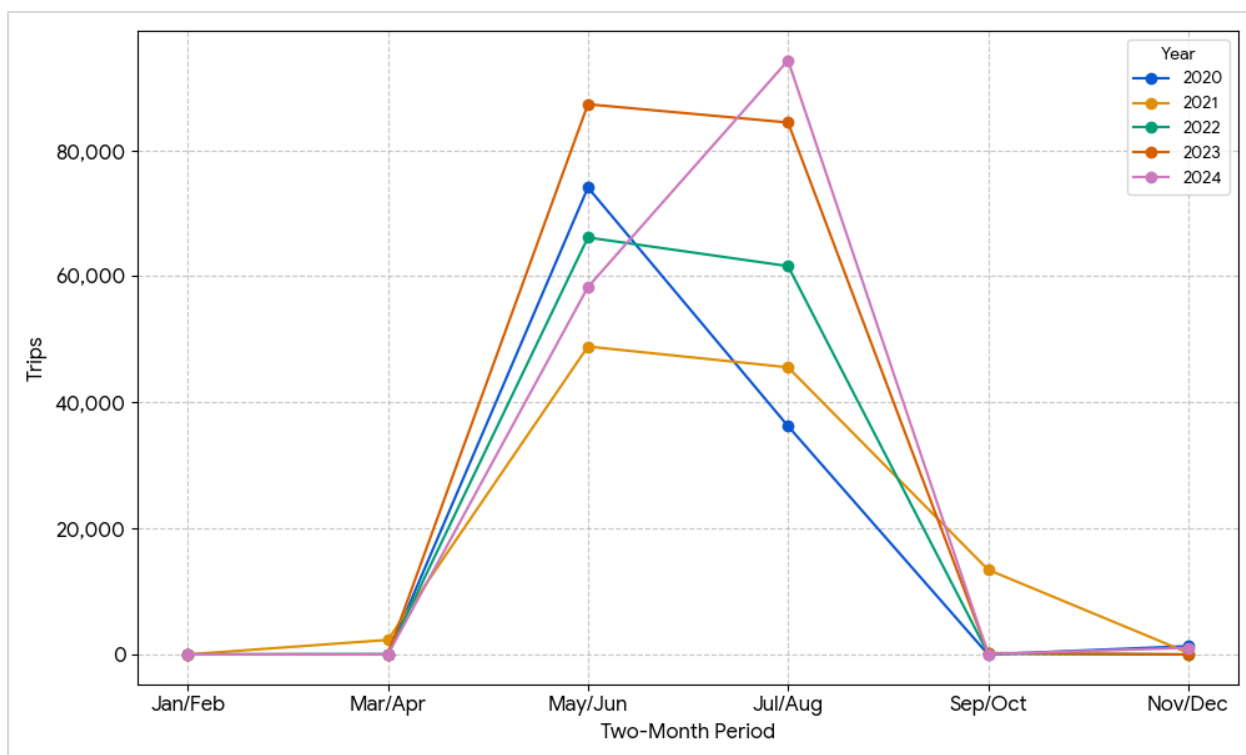


Figure 2.3.1. Gulf charter mode red snapper recreational target trips in federal waters by two-month period, 2020-2024.

Source: MRIP database, SERO, NMFS (April 2026) for AL, FL and MS; LDWF Recreational Creel Survey for LA; TPWD Marine Sport-Harvest Monitoring Program for TX.

Similar analysis of recreational effort is not possible for the headboat mode because headboat data is not collected at the angler level. Estimates of effort by the headboat mode are provided in terms of angler days, or the total number of standardized full-day angler trips.² Headboat angler days across the Gulf increased substantially in 2021 and then decreased steadily through 2024 (Table 2.3.3). On average (2020 through 2024), Florida accounted for the majority of headboat angler days reported, followed by Texas. Alabama, Mississippi, and Louisiana combined accounted for only a small percentage (Table 2.3.3). Headboat effort in terms of angler days for the entire Gulf tended to be concentrated most heavily during the summer months of June through August (Figure 2.3.2).

² Headboat trip categories include half-, three-quarter-, full-, and 2-day trips. A full-day trip equals one angler day, a half-day trip equals .5 angler days, etc. Angler days are not standardized to an hourly measure of effort, and actual trip durations may vary within each category.

Table 2.3.3. Gulf headboat angler days and percent distribution by state (2020 through 2024).

	Angler Days				Percent Distribution		
	FL	AL- MS- LA	TX	Total	FL	AL- MS- LA	TX
2020	126,794	14,819	51,498	193,111	65.66%	7.67%	26.67%
2021	181,632	17,041	71,344	270,017	67.27%	6.31%	26.42%
2022	149,368	18,263	62,705	230,336	64.85%	7.93%	27.22%
2023	149,735	15,757	58,279	223,771	66.91%	7.04%	26.04%
2024	146,544	12,874	57,074	216,492	67.69%	5.95%	26.36%
Average	150,815	15,751	60,180	226,745	66.48%	6.98%	26.54%

Source: NMFS Southeast Region Headboat Survey (SRHS) (2024).

*Headboat data from Alabama, Mississippi, and Louisiana are combined for confidentiality purposes.

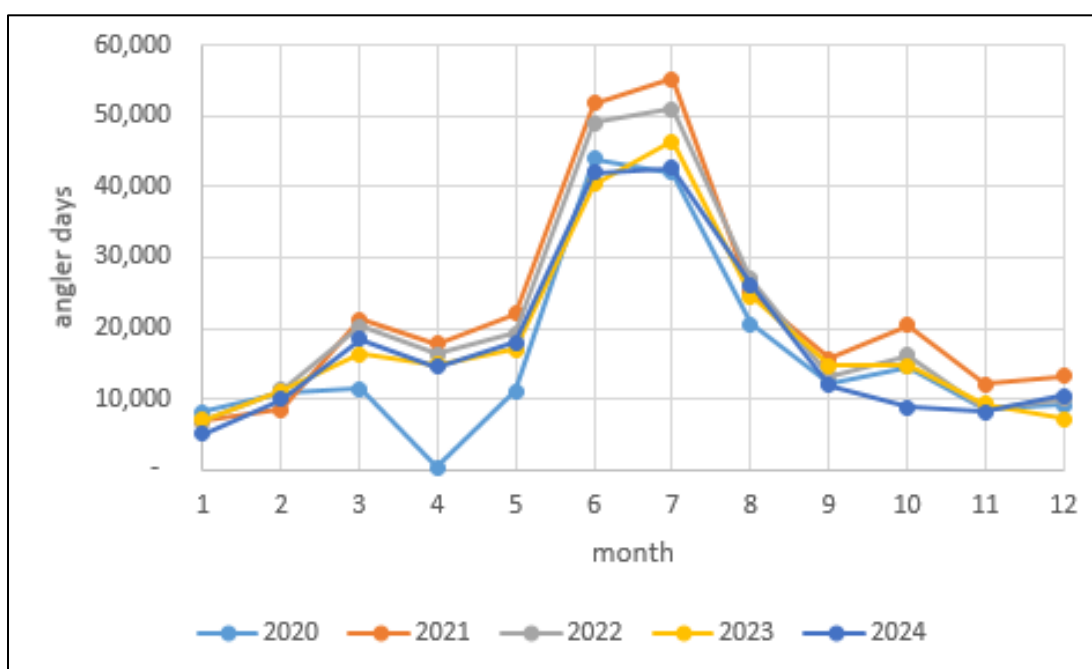


Figure 2.3.2. Gulf headboat angler days by month and year (2020-2024).

Source: NMFS SRHS (2024).

Economic Value

Participation, effort, and harvest are indicators of the value of saltwater recreational fishing. However, a more specific indicator of value is consumer surplus (CS), which is the difference between the maximum amount an angler would be willing to pay for a fish and the amount they actually do pay.³ CS represents a savings of one's income that can be spent later on other goods and services, leading to an overall increase in utility or satisfaction for the angler and a benefit to the economy. All else equal, the amount anglers are willing to pay, and the costs of fishing can

³ Holding income and the prices of other goods constant.

vary depending on expected catch rates, harvest rates, and existing regulations. The economic value of changes in expected catch rates, harvest rates, or existing regulations can be measured by any associated changes in CS. However, because recreationally caught fish are non-market goods and there are no transaction data available, CS cannot be measured directly. Instead, using survey elicitation methods and stated or revealed preference models, it is possible to estimate willingness to pay values⁴ that are a close approximation to the individual CS an angler would derive from an additional fish that is caught and kept. The estimated value of the CS for catching and keeping a second red snapper on an angler trip is \$105 (values updated to 2025 dollars⁵) and decreases thereafter (\$70 for a third red snapper, \$52 for a fourth red snapper, and \$41 for a fifth red snapper) (Carter and Liese 2012).

Economic value for the for-hire component of the recreational sector can be measured in many ways. According to Savolainen et al. (2012), the average charter vessel operating in the Gulf is estimated to receive approximately \$110,000 (2025\$) in gross revenue and \$33,000 (2025\$) in net income (gross revenue minus variable and fixed costs) annually. The average headboat is estimated to receive approximately \$335,000 (2025\$) in gross revenue and \$98,000 (2025\$) in net income annually. More recent estimates of average annual gross revenue for Gulf headboats are provided in Abbott and Willard (2017) and D. Carter, SEFSC, pers. comm. 2018. Abbott and Willard (2017) suggest that Savolainen, et al.'s estimate of average annual gross revenue for headboats may be an underestimate, as data in the former suggest that average gross revenue in 2009 for the vessels in their sample was about \$592,000 (2025\$). Further, their data suggest average annual gross revenue per vessel had increased to about \$715,000 (2025\$) by 2014. However, Abbott and Willard's estimates are based on a sample of 17 headboats that chose to participate in the headboat collaborative program in 2014, while the Savolainen, et al. estimates are based on a random sample of 20 headboats. The headboats that participated in the collaborative program may be economic highliners, in which case Abbott and Willard's estimates would overestimate average annual gross revenue for Gulf headboats. D. Carter, SEFSC, pers. comm. 2018 recently estimated that average annual gross revenue for Gulf headboats was approximately \$530,000 (2025\$) in 2017. This estimate is likely the best current estimate of annual gross revenue for Gulf headboats, as it is based on a relatively large sample of 63 boats, or more than 90% of the active fleet, and is more recent.

However, gross revenues overstate the annual economic value and profits generated by for-hire vessels. Economic value for for-hire vessels can be measured by producer surplus (PS) per passenger trip (the amount of money that a vessel owner earns in excess of the cost of providing the trip). Estimates of revenue, costs, and trip net revenue (TNR) for trips taken by headboats and charter vessels in 2017 are available from Souza and Liese (2019). After accounting for transactions fees, supply costs, and labor costs, net revenue per trip was 42% of revenue for Gulf charter vessels and 54% of revenue for Southeast headboats,⁶ or \$966 and \$2,244 (2025 dollars),

⁴ These are measures of compensating surplus, or the amount of money that an angler would be willing to pay in order to harvest the additional fish, while maintaining the same level of utility.

⁵ Converted to 2025 dollars using the annual, not seasonally adjusted GDP implicit price deflator provided by the U.S. Bureau of Economic Analysis.

⁶ Southeast headboats include headboats operating either the Gulf or South Atlantic. Souza and Liese (2019) state "the sample size available for headboats is limited (n=30) and, hence, the results are presented at an overall SE aggregation."

respectively (Table 2.3.4). When TNR is divided by the number of anglers on a trip, it represents cash flow per angler (CFpA), which approximates PS per angler trip. The estimated CFpA value for an average Gulf charter angler trip is \$176 (2025\$) and the estimated CFpA value for an average Gulf headboat angler trip is \$80 (2025\$) (Souza and Liese 2019). Estimates of CFpA for individual reef fish species or species group target trips, in particular, are not available.

Table 2.3.4. Trip economics for offshore trips by Gulf charter vessels and Southeast headboats in 2017 (2025\$).

	Gulf Charter Vessels	Southeast Headboats
Revenue	100%	100%
Transaction Fees (% of revenue)	3%	6%
Supply Costs (% of revenue)	27%	19%
Labor Costs (% of revenue)	27%	22%
Net Revenue per Trip including Labor Costs (% of revenue)	42%	54%
Net Revenue per Trip	\$966	\$2,244
Average # of Anglers per Trip	5.5	28.2
Trip Net Cash Flow per Angler Trip	\$176	\$80

Source: Souza and Liese (2019).

Business Activity

The desire for recreational fishing generates economic activity as consumers spend their income on various goods and services needed for recreational fishing. This spurs economic activity in the region where recreational fishing occurs. Note, in the absence of the opportunity to fish, the income would presumably be spent on other goods and services, and these expenditures would similarly generate economic activity in the region where the expenditure occurs. As such, the analysis below represents a distributional analysis only.

Estimates of the business activity (economic impacts) associated with recreational angling for Gulf red snapper on charter trips in Federal waters were calculated using average trip-level impact coefficients derived from the 2022 Fisheries Economics of the U.S. report (NMFS 2024) and underlying data provided by the National Oceanic and Atmospheric Administration Office of Science and Technology. Economic impact estimates in 2022 dollars were adjusted to 2025 dollars using the annual, not seasonally adjusted, gross domestic product (GDP) implicit price deflator provided by the U.S. Bureau of Economic Analysis.

Business activity (economic impacts) for the recreational sector is characterized in the form of jobs (full- and part-time), income impacts (wages, salaries, and self-employed income), output impacts (gross business sales), and value-added impacts (contribution to the GDP in a state or region). Estimates of the average annual economic impacts (2020-2024) resulting from federal waters charter trips that targeted Gulf red snapper are provided in Table 2.3.5. These impacts should not be added together because this would result in double counting. The average impact coefficients, or multipliers, used in the model are invariant to the “type” of effort (e.g., target or catch) and can therefore be directly used to measure the impact of other effort measures such as

Gulf charter mode red snapper catch trips. To calculate the multipliers from Table 2.3.5, simply divide the desired impact measure (value-added impact, sales impact, income impact, or employment) associated with a given state by the number of target trips for that state.

The estimates provided in Table 2.3.5 only apply at the state-level. Addition of the state-level estimates to produce a regional (or national) total may underestimate the actual amount of total business activity, because state-level impact multipliers do not account for interstate and interregional trading. It is also important to note that these economic impacts estimates are based on trip expenditures only and do not account for durable expenditures. Durable expenditures cannot be reasonably apportioned to individual species or species groups. As such, the estimates provided in Table 2.3.5 may be considered a lower bound on the economic activity associated with those Federal waters charter trips that targeted Gulf red snapper.

Estimates of the business activity associated with headboat effort are not available. Headboat vessels are not covered by MRIP in the Southeast, so, in addition to the absence of estimates of target effort, estimation of the appropriate business activity coefficients for headboat effort has not been conducted.

Table 2.3.5. Estimated average annual economic impacts (2020-2024) from Federal waters charter trips that targeted Gulf red snapper, by state, using state-level multipliers. All monetary estimates are in 2025 dollars in thousands.

	FL	AL	MS	LA	TX
Target Trips	81,351	44,347	785	5,209	3,433
Value Added Impacts	\$56,459	\$18,544	\$121	\$3,517	\$2,648
Sales Impacts	\$89,422	\$32,400	\$204	\$6,172	\$4,381
Income Impacts	\$38,487	\$13,393	\$75	\$2,534	\$1,684
Employment (Jobs)	775	379	3	74	37

National-level multipliers must be used to account for interstate and interregional trading when calculating a national total of economic impacts. Between 2020 and 2024, and using national-level multipliers, Federal waters charter trips that targeted Gulf red snapper generated employment, income, value-added, and output (sales) impacts of 1,343 jobs, \$70 million, \$105.3 million, and \$177.8 million per year, respectively, on average.

2.4 Impacts of Management Measures

The following discussion analyzes the expected economic effects and impacts of **Preferred Option 1** and **Option 2** relative to the status quo. Under the status quo, the current federal for-hire component fishing season for red snapper opens on June 1 and closes when the component annual catch target (ACT) is projected to be met, or on December 31, whichever comes first.

Preferred Option 1 and **Option 2** would modify the federal for-hire component fishing season for red snapper with an earlier opening date. **Preferred Option 1** would change that date to the Friday before the Memorial Day Federal Holiday, and **Option 2** would change that date to May 15. With both alternatives, the season would still close when the for-hire component ACT is projected to be met, or on December 31, whichever comes first. As noted in Table 1.3.1, the

projected season duration is 91 fishing days under **Preferred Option 1** and **Option 2**, the same as under the status quo. As a result, no changes in CS or PS are expected directly from season length. However, if trips are in higher demand earlier in the year, especially on a holiday weekend, then the for-hire component may charge higher prices for those trips, resulting in greater PS and less uncertainty about annual earnings. The potential for trip cancellations might also be lower earlier in the year, prior to hurricane season, which would also contribute to less uncertainty about annual earnings. These effects cannot be quantified with available data.

2.5 Public and Private Costs of Regulations

The preparation, implementation, enforcement, and monitoring of this or any federal action involves the expenditure of public and private resources, which can be expressed as costs associated with the regulations. Costs to the private sector and program-related administrative costs to NMFS, if any, are discussed under the impacts of management measures (Section 2.4). Public costs associated with the development of this framework action, including Gulf Council (Council) costs of document preparation, meetings, public hearings, and information dissemination, as well as NMFS administrative costs of document preparation, meetings and review, are treated as sunk costs and excluded from this analysis per Office of Management and Budget guidance. Council and NMFS administrative costs directly attributable to the development of this framework action and the rulemaking process would be incurred prior to the effective date of the final rule implementing this framework action.

Additionally, this analysis does not include any additional law enforcement costs. Any enforcement duties associated with this action would be expected to be covered under routine enforcement costs rather than an expenditure of new funds.

2.6 Determination of Significant Regulatory Action

Pursuant to E.O. 12866, a regulation is considered a “significant regulatory action” if it is likely to result in: 1) an annual effect of \$100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or state, local, or tribal governments or communities; 2) create a serious inconsistency or otherwise interfere with an action taken or planned by another agency; 3) materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights or obligations of recipients thereof; or 4) raise novel legal or policy issues arising out of legal mandates, the President’s priorities, or the principles set forth in this E.O. Based on the analysis in Section 2.4, the annual economic effects from this action are not expected to meet or exceed the \$100 million threshold. Thus, this action has been determined to not be economically significant for the purposes of E.O. 12866.

CHAPTER 3. REGULATORY FLEXIBILITY ACT ANALYSIS

The purpose of the Regulatory Flexibility Act (RFA) is to establish a principle of regulatory issuance that agencies shall endeavor, consistent with the objectives of the rule and of applicable statutes to fit regulatory and informational requirements to the scale of businesses, organizations, and governmental jurisdictions subject to regulation. To achieve this principle, agencies are required to solicit and consider flexible regulatory proposals and to explain the rationale for their actions to assure such proposals are given serious consideration. The RFA does not contain any decision criteria; instead the purpose of it is to inform the agency, as well as the public, of the expected economic effects of various alternatives contained in the regulatory action and to ensure the agency considers alternatives that minimize the expected economic effects on small entities while meeting the goals and objectives of the applicable statutes (e.g., the Magnuson-Stevens Fishery Conservation and Management Act [Magnuson-Stevens Act]).

With certain exceptions, the RFA requires agencies to conduct an initial regulatory flexibility analysis (IRFA) for each proposed rule. The IRFA is designed to assess the effects various regulatory alternatives would have on small entities, including small businesses, and to determine ways to minimize those effects. An IRFA is primarily conducted to determine whether the proposed regulatory action would have a significant economic effect on a substantial number of small entities. In addition to analyses conducted for the Regulatory Impact Review (RIR), the IRFA provides: 1) a description of the reasons why action by the agency is being considered; 2) a succinct statement of the objectives of, and legal basis for, the proposed regulatory action; 3) a description and, where feasible, an estimate of the number of small entities to which the proposed regulatory action will apply; 4) a description of the projected reporting, record-keeping, and other compliance requirements of the proposed regulatory action, including an estimate of the classes of small entities which will be subject to the requirements of the report or record; 5) an identification, to the extent practicable, of all relevant federal rules, which may duplicate, overlap, or conflict with the proposed rule; and 6) a description of any significant alternatives to the proposed regulatory action which accomplish the stated objectives of applicable statutes and would minimize any significant economic effects of the proposed regulatory action on small entities.

In addition to the information provided in this section, additional information on the expected economic effects of the proposed action is included in the RIR.

3.1 Statement of the need for, objective of, and legal basis for the proposed action

A discussion of the reasons why action by the agency is being considered is provided in Chapter 1. In summary, there is a need to allow the federal for-hire component more opportunity to harvest red snapper at a level consistent with achieving optimum yield for the recreational sector in the long-term, while preventing overfishing on an annual basis, and while rebuilding the red snapper stock. The objective of this proposed action is to modify the fishing season for the federal for-hire component for red snapper to allow greater recreational access while continuing

to constrain landings to the component annual catch limit (ACL), as well as the total recreational ACL. The Magnuson-Stevens Act provides the statutory basis for this proposed action. All monetary estimates in the following analysis are in 2025 dollars.

3.2 Description and estimate of the number of small entities to which the proposed action would apply

This proposed action would modify the federal for-hire component fishing season for red snapper. The fishing season would open on the Friday before the Memorial Day (MD) Federal Holiday and close when the for-hire component annual catch target (ACT) is projected to be met, or on December 31, whichever occurs first. Currently, the fishing season opens on June 1 and closes when the for-hire component ACT is projected to be met, or on December 31, whichever occurs first.

The RFA requires the National Marine Fisheries Service (NMFS) to describe the impact of the proposed rule on small entities (5 U.S.C. 603). Small entities include small businesses, small organizations, and small governmental jurisdictions (5 U.S.C. 601(3)-(6)).

This proposed action would directly apply to all for-hire fishing businesses (charter vessels and headboats) that fish for red snapper in federal waters of the Gulf. While the proposed action may also affect recreational anglers on for-hire vessels, these individuals are not considered small entities as defined by the RFA. Accordingly, impacts on recreational anglers are outside the scope of this analysis, and the following discussion focuses exclusively on for-hire businesses.

Any for-hire fishing vessel that takes anglers into the Gulf of America (Gulf) exclusive economic zone (EEZ) to harvest reef fish must have a valid limited-access (federal) charter/headboat permit for reef fish issued to that vessel and the permit must be onboard. From 2020-2024, there were an average of 1,282 vessels with charter/headboat permits for reef fish. Although the charter/headboat for reef fish permit application collects information on the primary method of operation, the resultant permit itself does not identify the permitted vessel as either a headboat or a charter vessel. Operation as either a headboat or charter vessel is not restricted by permitting regulations, and vessels may operate in both capacities. However, only selected headboats are required to submit harvest and effort information to the NMFS Southeast Region Headboat Survey (SRHS). Participation in the SRHS is based on determination by the Southeast Fisheries Science Center (SEFSC) that the vessel primarily operates as a headboat. During 2024, 73 Gulf headboats were registered in the SRHS (R. Cheshire, NMFS SEFSC, pers. comm. 2025). As a result, of the 1,282 vessels with federal charter/headboat permits for reef fish, up to 73 may primarily operate as headboats and the remainder as charter vessels. The most recent estimates of average annual gross revenues for Gulf for-hire vessels are \$110,000 for charter vessels and \$530,000 for headboats.

A business primarily involved in the operation of a for-hire fishing vessel is included within the broader scenic and sightseeing transportation, water industry (North American Industry Classification System code 487210). For-hire fishing operations make up just part of the broader industry. A business primarily involved in the scenic and sightseeing transportation, water

industry is classified as a small business by the Small Business Administration (SBA) if it is independently owned and operated, is not dominant in its field of operation (including its affiliates) and its combined average annual receipts are no more than \$14 million for all of its affiliated operations worldwide. All of the for-hire fishing businesses directly regulated by this proposed action are believed to be small entities based on the SBA size standard.

3.3 Description of the projected reporting, record-keeping and other compliance requirements of the proposed action

This proposed action would not establish any new reporting, record-keeping, or other compliance requirements.

3.4 Identification of all relevant federal rules, which may duplicate, overlap or conflict with the proposed action

No federal rules have been identified that duplicate, overlap, or conflict with the proposed action.

3.5 Significance of economic impacts on a substantial number of small entities

Substantial number criterion

If implemented, this proposed action is expected to directly affect up to 1,282 vessels with charter/headboat permits for reef fish. All regulated for-hire fishing businesses have been determined, for the purpose of this analysis, to be small entities. Based on this information, the proposed action is expected to affect a substantial number of small businesses.

Significant economic effects

The outcome of “significant economic impact” can be ascertained by examining two factors: disproportionality and profitability.

Disproportionality: Do the regulations place a substantial number of small entities at a significant competitive disadvantage to large entities?

All entities directly regulated by this proposed action have been determined to be small entities. Thus, the issue of disproportionality does not arise in the present case.

Profitability: Do the regulations significantly reduce profits for a substantial number of small entities?

A detailed analysis of the economic effects associated with this proposed regulatory action can be found in the Regulatory Impact Review in Chapter 2. The following information summarizes that analysis and additionally, analyzes the effects of this proposed action on the profitability of small entities.

This proposed action would shift the start date of the federal for-hire component fishing season for red snapper from June 1 to the Friday before the MD Federal Holiday, but it would not be expected to change the duration of the fishing season. The season is projected to be 91 fishing days long under this proposed action as well as the status quo, so no changes in producer surplus (PS) are expected to result directly from a change in season length. However, if trips are in higher demand earlier in the year, especially on a holiday weekend, then the for-hire component may charge higher prices for those trips, resulting in greater PS and less uncertainty about annual earnings. The potential for trip cancellations might also be lower earlier in the year, prior to hurricane season, which would also contribute to less uncertainty about annual earnings. These effects cannot be quantified with available data; however, they are expected to result in minor increases in profitability for some for-hire businesses.

In summary, this proposed action would not be expected to have a significant economic impact on a substantial number of small entities.

3.6 Description of the significant alternatives to the proposed action and discussion of how the alternatives attempt to minimize economic impacts on small entities

This proposed action, if implemented, would not be expected to have a significant economic impact on a substantial number of small entities. As a result, the issue of significant alternatives is not relevant.

CHAPTER 4. LIST OF PREPARERS

PREPARERS

Name	Expertise	Responsibility	Agency
Ryan Rindone	Fishery Biologist	Co-Team Lead – Amendment development, physical, biological, and administrative analyses	Gulf Council
Dan Luers	Fishery Biologist	Co-Team Lead – Amendment development, physical, biological, and administrative analyses	SERO
Jesse Buntin	Fishery Biologist	Co-Team Lead – Amendment development, physical, biological, and administrative analyses	SERO
Matt Freeman	Economist	Economic analyses	Gulf Council
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Christina Package-Ward	Anthropologist	Social analyses	SERO
Dominique Lazarre	Fishery Biologist	Data analyses	SERO

REVIEWERS

Name	Expertise	Responsibility	Agency
Mara Levy	General Counsel	Legal review	NOAA GC
Scott Sandorf	Technical writer and editor	Regulatory writer	SERO
Katie Siegfried	Research Ecologist	Review	SEFSC
David Carter	Economist	Review	SEFSC
Jennifer Lee	Protected Resources	Review	SERO
Michael Larkin	Fishery Biologist	Data analyses review	SERO
Michael Schirripa	Research Ecologist	Review	SEFSC
Noah Silverman	Fishery Biologist	National Environmental Policy Act review	SERO
Frank Helies	Fishery Biologist	Review	SERO
John Froeschke	Fishery Biologist	Review	Gulf Council
Carrie Simmons	Fishery Biologist	Review	Gulf Council

NOAA GC = National Oceanic and Atmospheric Administration General Counsel; SEFSC = Southeast Fisheries Science Center; SERO = Southeast Regional Office of the National Marine Fisheries Service

CHAPTER 5. REFERENCES

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APPENDIX A: PUBLIC COMMENTS

Summary of Public Comment

Comments received between August 2024 and August 19, 2025
20 Comments Received

- Support for Alternative 1 – No Action
 - Wait until a federal for-hire reporting program is in place before increasing uncertainty by changing season dates.
 - For-hire operators should not be allowed to preseason fish ahead of the private anglers.
- Support for Alternative 2 – Open the federal for-hire red snapper season the Friday before Memorial Day.
 - August fishing is less desirable so opening early is better for business.
 - It would be great to fish a big holiday weekend.
- Support for Alternative 3 - Open the federal for-hire red snapper season May 15th.
 - Allows for more fishing early in the year, which is more desirable.
 - Higher discard mortality associated with fishing later in the year when it is hot, so an early start will benefit the stock.
 - Alternative 2, opening before Memorial Day will not always provide many more days and is inconsistent.
- Use caution in changing the season date if it may cause a quota overage.
- The charter and commercial season dates should mirror the private recreational season.

APPENDIX B. RED SNAPPER FOR-HIRE SEASON DURATION ANALYSIS

Season Duration Analysis for Gulf of America Recreational For-Hire Red Snapper Fleet 2025
Fishing Season

LAPP/DM Branch
National Marine Fisheries Service (NMFS)
Southeast Regional Office
September 2024

Background

Gulf of America (Gulf) red snapper are managed in federal waters under the Fishery Management Plan (FMP) for the Reef Fish Resources of the Gulf (Reef Fish FMP). In April 2015, a Final Framework Action to the Reef Fish FMP set the red snapper recreational sector to close when the annual catch target (ACT) is met. Amendment 40 to the Reef Fish FMP increased flexibility in managing red snapper landings and minimized the chance of recreational annual catch limit overages by separating the recreational sector into two components. Prior to the implementation of Amendment 40 in 2015, recreational management measures were applied to the recreational sector as a whole, without distinguishing between the private angling/state charter and federal for-hire components. Amendment 40 defined two distinct components of the recreational sector as 1) a private angling component that includes private anglers fishing from privately owned vessels, as well as operators of state-permitted for-hire vessels that do not have a federal permit, and 2) a federal for-hire component that includes operators of federally permitted for-hire vessels. The federal for-hire component includes charter vessels and headboats with a federal charter/headboat permit for reef fish, allowing these vessels to fish in federal waters. For-hire vessels without a federal permit are restricted to fishing for red snapper in state waters only. The Gulf federal recreational fishing regulations for red snapper include a 16-inch total length minimum size limit, two-fish per person daily bag limit (no red snapper may be retained by the captain or crew of a vessel operating as a charter vessel or headboat), and a federal for-hire season beginning on June 1 and ending when the component ACT is projected to be caught. Although the states set seasons for the red snapper private angling/state charter component in state and federal waters, NMFS must still set a red snapper season throughout federal waters for the federal for-hire component.

Currently, the federal for-hire component of the recreational sector's harvest is constrained by an ACT set 9% below the ACL for red snapper to account for management uncertainty. The federal for-hire season opens on June 1 and is set to close when the component's ACT is projected to be met. The season duration has doubled since 2014, increasing from 44 days to 88 days over that time period. If the ACT is not met by the projected closure date, the NMFS Regional Administrator has the authority to re-open the fishing season later in the year. In recent years, stakeholders have raised concerns about extending the red snapper federal for-hire season into fall months, when customers are less likely to book trips. In response to these concerns and a consistent record of federal for-hire landings staying below the ACL, the Gulf Council is considering making changes to the season start dates for the federal for-hire component of the

recreational sector. This analysis will project the season duration associated with each proposed season start date (Table B.1).

Table B.1. Proposed modifications to season start and ends dates for the Gulf federal for-hire component of the red snapper fishery.

Action 2 Alternatives
<i>No Action.</i> The federal for-hire component fishing season for red snapper opens on June 1 and closes when the ACT is projected to be met, or on December 31, whichever comes first.
<i>Preferred Option 1:</i> Modify the federal for-hire component fishing season for red snapper to open on the Friday before the Memorial Day Federal Holiday and close when the ACT is projected to be met, or on December 31, whichever comes first.
<i>Option 2:</i> Modify the federal for-hire component fishing season for red snapper to open on May 15 and close when the ACT is projected to be met, or on December 31, whichever comes first.

Data Sources

The Southeast Fisheries Science Center (SEFSC) compiles landings data from various sources to track commercial and recreational landings for all federally managed species. Landings for the recreational sector are estimated from a combination of state and federal surveys. The two state surveys that generate recreational landings estimates come from Texas and Louisiana. The Texas Parks and Wildlife Department Sport-boat Angling Survey (TPWD) uses dockside interviews at public recreational boat access sites to generate catch and effort estimates for finfish species caught by private and charter vessels off the Texas coast. In Louisiana, the Louisiana Department of Wildlife & Fisheries uses the combination of a dockside intercept survey and phone/email survey to estimate recreational saltwater harvests from shore, private vessels, and charter trips (LA Creel).

Federally administered surveys generate Gulf landings estimates for all headboat vessels and landings from shore, private vessels and charter vessels not covered by the Texas or Louisiana state surveys. The Southeast Region Headboat Survey (SRHS) produces landings estimates for species caught by headboats operating in the southeastern United States by combining dockside intercept and logbook data. Federal estimates of shore, private vessel and charter vessel landings were initially generated by the Marine Recreational Fisheries Statistics Survey (MRFSS), which used a combination of dockside intercept survey and telephone effort survey data to estimate landings. This survey was replaced by the Marine Recreational Information Program (MRIP) in 2008 to improve precision, accuracy, and timeliness of recreational catch estimates. MRIP uses the Access Point Angler Intercept Survey (APAIS) to collect dockside catch data from anglers fishing from shore, private vessels, and charter vessels. Fishing effort data for the shore and private vessel fishing modes was collected by the Coastal Household Telephone Survey (CHTS), and charter vessel effort was estimated from data collected by the For-Hire Survey (FHS). In 2018, CHTS was replaced by a mail survey, the Fishing Effort Survey (FES). The changes to the federal survey over time have led to recreational landings being estimated in three different data units to adjust estimates to incorporate updated methodology. MRFSS units represent the earliest iteration of the federal survey; MRIP-CHTS incorporates updates to the dockside APAIS and implementation of the improved CHTS phone survey; and MRIP-FES incorporates the

change from a telephone to a mail-based effort survey. The SEFSC creates three separate final recreational landings data sets that combine TPWD, LA Creel and SRHS landings estimates with either the MRFSS, MRIP-CHTS, or MRIP-FES survey estimates. Catch limits for federally managed species are monitored with the recreational data unit associated with the last stock assessment for each species.

Following SEDAR 52 (2018), recreational landings that include MRIP-CHTS survey units have been used to monitor red snapper. Landings data were provided by the SEFSC on April 29, 2024. This analysis focuses on the federal for-hire landings for red snapper from the last five years. The federal for-hire landings are an aggregation of landings from the headboat and charter fleets in the Gulf. All headboat landings, regardless of wave are assigned to the federal for-hire component. The charter component can include a mixture of landings from state or federal waters. During waves when the federal for-hire season is closed, any charter landings are associated with the private component of the fishery. All charter landings from federal waters during waves when the federal for-hire season is open are assigned to the federal for-hire component. A proportion is applied to state waters landings during waves when both state and federal waters are open to red snapper harvest. The proportions applied are state specific, with the ratio of state charter to federal landings reported as a function of the number of days the state or federal season is open in each wave or a ratio of state to federal waters landings derived using dockside intercept and FHS data. The following season duration analysis uses only landings associated with the federal for-hire component of the fishery, after completing the partitioning exercise described above.

Season Duration Analysis

Daily catch rates for the federal for-hire component of the recreational sector were estimated for each Gulf state by dividing the annual federal for-hire landings by the number of days the federal for-hire season was open. Catch rates (lb/day) are calculated for each state. Season duration projections were determined by cumulatively summing total catch rates until the ACT was projected to be met. The federal season has ranged in duration from 62 to 85 days over the last five years (Table B.2).

Table B.2. Federal for-hire season duration in days for the last five years (2019 to 2023).

Year	Days the Federal For-Hire Season was Open
2019	62
2020	63
2021	87
2022	79
2023	85

Recreational landings from different years were averaged and used to predict future landings and to capture a range of potential federal for-hire season durations (Table B.3). Season duration

projections were determined by cumulatively summing the daily catch rate until a catch target was projected to be met. Season durations were projected using federal for-hire catch rates from the three averages for 1) 2019-2021, 2) 2019-2023, and 3) 2021-2023, and also a prediction using only 2023 catch rates. The season duration, in fishing days, was projected for each catch rate until the current ACT (3,076,322 lb ww) for the federal for-hire component was projected to be met (Table B.4). The season duration ranges from 85 to 91 days, depending on the daily catch rate used. It should be noted that this analysis assumes equal catch rates for the entirety of the federal fishing season because there are limited robust data sources available that more closely track landing rates over the short temporal period associated with the federal for-hire season.

Table B.3. Federal for-hire daily catch rates (lb ww/day) from the last five years (2019 to 2023) for each state and three different averages of these landings. The averages are for 2019 through 2021, 2019 through 2023, and 2021 through 2023.

Year(s)	TX	LA	MS	AL	West FL	Total
2019	7,597	1,827	667	12,135	19,045	41,271
2020	6,766	1,379	352	9,754	18,410	36,661
2021	7,589	1,343	124	5,405	16,020	30,481
2022	6,023	950	97	7,700	21,140	35,910
2023	5,274	1,995	299	8,879	18,608	35,056
Average 2019-2021	7,317	1,516	381	9,098	17,825	36,138
Average 2019-2023	6,650	1,499	308	8,775	18,645	35,876
Average 2021-2023	6,295	1,429	173	7,328	18,589	33,816

*Source: Southeast Fisheries Science Center's Recreational ACL Dataset [April 29, 2024].

Table B.4. Projected number of fishing days to reach the ACT for the federal for-hire component of the red snapper fishery for three different averages and only 2023 landings.

Projected Landings Description	Daily Catch Rate	ACT (3,076,322 lb ww)
Average 2019-2021	36,138	85
Average 2019-2023	35,876	86
Average 2021-2023	33,816	91
2023 Landings	35,056	88

Analysis of Proposed For-Hire Season Modifications

The Framework Action aims to address concerns from stakeholders that increased season duration would cause the fishing season to extend into late summer and fall months when bookings for the for-hire component start to decline. The following analysis indicates the closure dates for each proposed option, after adding the number of fishing days projected in the season duration analysis above (Table B.5). When evaluating the No Action option, the season is projected to end in the final week of August. Preferred Option 1 and Option 2 shift the season closure dates to the third and second full weeks of August, respectively. If Preferred Option 1 or Option 2 are selected, offshore federal fishing grounds would be open for an additional holiday

weekend, Memorial Day weekend, which has not been the case in recent years. This could lead to more fishing pressure in offshore waters earlier in the season that is not accounted for in current daily catch rate estimates.

Table B.5. Projected season duration for three different averages and only 2023 landings when the buffer between the ACT and ACL is 9% and the projected closure dates for each Action 1 alternative. The projected season duration was determined with the ACT of 3,076,322 lbs.

Projected Landings Description	Daily Catch Rate	Projected Season Duration (Fishing Days)	(No Action): Fishing Season Opens June 1	Preferred Option 1: Fishing Season Opens Friday before Memorial Day	Option 2: Fishing Season Opens May 15
Average 2019-2021	36,138	85	25-Aug	16-Aug	8-Aug
Average 2019-2023	35,876	86	26-Aug	17-Aug	9-Aug
Average 2021-2023	33,816	91	31-Aug	22-Aug	14-Aug
2023 Landings	35,056	88	28-Aug	19-Aug	11-Aug